

RESOLUTION NO. 46 21

**A RESOLUTION APPROVING THE COUNTY OF HAWAI‘I MASS TRANSIT AGENCY TITLE VI PROGRAM PLAN.**

**WHEREAS**, Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.) prohibits discrimination on the basis of race, color or national origin for recipients of federal financial assistance; and

**WHEREAS**, the Mass Transit Agency (“MTA”), as a recipient of Federal Transit Administration (“FTA”) financial assistance to provide public transportation, must prepare and submit a Title VI Plan that is compliant with FTA Circular 4702.1B Title VI Requirements and Guidelines for FTA Recipients (“Circular”) to the FTA; and

**WHEREAS**, the MTA prepared the 2020 Title VI Plan, attached hereto as “Exhibit A” in compliance with the requirements set forth in the Circular and reported that the MTA provides public transportation in conformance with Title VI legislation; and

**WHEREAS**, the 2020 Title VI Plan must be approved by the County’s governing entity, the Hawai‘i County Council, prior to submission to the FTA, pursuant to the Circular’s Requirements and Guidelines; now therefore,

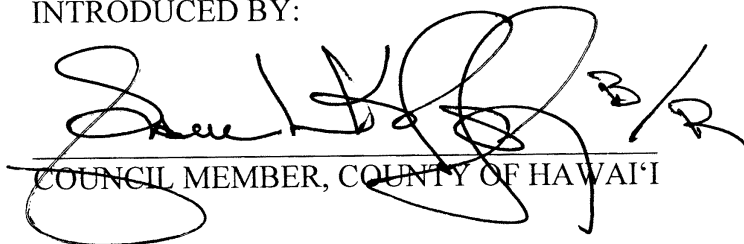
**BE IT RESOLVED BY THE COUNCIL OF THE COUNTY OF HAWAI‘I** that the 2020 Title VI Plan, attached hereto and which by reference is made a part hereof, be approved.

**BE IT FURTHER RESOLVED** that the MTA Administrator can make minor or editing changes to the 2020 Title VI Plan, attached hereto, provided no substantial additions or deletions are made.

**BE IT FINALLY RESOLVED** that the County Clerk shall transmit a copy of this resolution to the Honorable Mitchell D. Roth, Mayor; Brenda Carreira, Mass Transit Agency Administrator; and Malia Hall, Deputy Corporation Counsel.

Dated at Kona, Hawai'i, this 17th day of March, 2021.

INTRODUCED BY:

  
 COUNCIL MEMBER, COUNTY OF HAWAI'I

COUNTY COUNCIL  
 County of Hawai'i  
 Hilo, Hawai'i

ROLL CALL VOTE

	AYES	NOES	ABS	EX
CHUNG	X			
DAVID			X	
INABA	X			
KĀNEALI'I-KLEINFELDER	X			
KIERKIEWICZ	X			
KIMBALL	X			
LEE LOY	X			
RICHARDS	X			
VILLEGAS	X			
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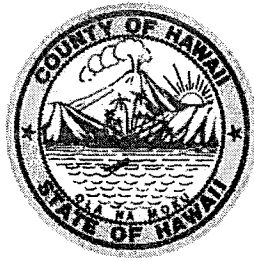
I hereby certify that the foregoing RESOLUTION was by the vote indicated to the right hereof adopted by the COUNCIL of the County of Hawai'i on March 17, 2021.

ATTEST:

  
 COUNTY CLERK CHAIRPERSON & PRESIDING OFFICER

Reference: C-118/PWMTIC-4

RESOLUTION NO. 46 21



**DRAFT**  
**COUNTY OF HAWAII**  
**Mass Transit Agency**  
**(MTA)**

**TITLE VI PROGRAM PLAN**

**Developed:** \_\_\_\_\_  
25 Aupuni Street, Hilo, HI 96720  
[www.heleonbus.org](http://www.heleonbus.org)

This document was prepared by County of Hawaii, Mass Transit Agency (MTA) to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

**Reference:** *FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients (October 1, 2012).*

### **County of Hawai'i Mass Transit Agency Title VI Policy Statement**

*The County of Hawai'i Mass Transit Agency is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.*

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- ATTACHMENT A: County of Hawai'i Mass Transit Agency Title VI Complaint Form
- ATTACHMENT B: County of Hawai'i Mass Transit Agency Public Participation Plan
- ATTACHMENT C: County of Hawai'i Mass Transit Agency Limited English Proficient Plan
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- 1: Title VI Acknowledgement Form
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## **EXECUTIVE SUMMARY**

The County of Hawaii Mass Transit Agency (MTA) is responsible for providing fixed-route and paratransit service for Hawai'i Island. In addition, MTA provides a shared ride taxi program which offers origin to destination services in the urbanized areas of Hilo. The Hele-On Bus, paratransit services, and shared ride taxi programs are operated by private firms under contract with MTA.

MTA's vision is to create a high quality multi-modal transportation system that provides safe, reliable, convenient mobility choices that meet the commuting, social service, and other needs of our residents and visitors. The multi-modal system should be environmentally responsible and cost effective.

Federal Funding from the Federal Transit Administration has been relied upon for many years. MTA receives Section 5311 and Section 5339 for operations and capital support.

Staff of the MTA includes an Administrator, Administrative Services Assistant, Program Manager, Transportation Specialist, Transit Operations Assistant, Transit Assistant, Account Clerks (3), Garage Supervisor, Automotive Mechanic II, and Automotive Mechanic I (3).

## **INTRODUCTION**

As a recipient of Federal Transit Administration funds, the Title VI Program Plan is to establish guidelines to effectively monitor and ensure that the County of Hawai'i Mass Transit Agency's programs and services, are in compliance with Title VI requirements.

Title VI states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The County of Hawai'i Mass Transit Agency will ensure that its programs, policies, and activities comply with Department of Transportation's (DOT) Title VI Regulations (49 CFR Part 21) and with Limited English Proficient (LEP) Persons requirements (70 FR 74087, December 14, 2005). MTA is committed to creating and maintaining a public transportation system that is free of all forms of discrimination and will take all necessary actions that violates this policy or the rights and privileges of those it is designed to protect. FTA requires recipients to document compliance with DOT Title VI regulations by submitting a Title VI Program Plan once every three years.

### **Title VI Coordinator Contact information**

Kasie Kailikea, Mass Transit Agency, 25 Aupuni Street, Hilo, HI 96720  
Phone: 808-961-8744 Fax: 808-961-8745 Email: [Kasie.Kailikea@hawaiicounty.gov](mailto:Kasie.Kailikea@hawaiicounty.gov)

## I. General Requirements and Guidelines for All FTA Recipients

### **Notifying the Public of Rights under Title VI**

#### **Title VI Information Dissemination**

Title VI information posters shall be prominently and publicly displayed in the MTA's Transit facilities and on their revenue vehicles.

Title VI information shall be disseminated to MTA's employees annually with payroll or pay stub envelopes. This notice reminds employees of the MTA's policy statement, and of their Title VI responsibilities in their daily work and duties.

During new employee orientation, new employees shall be informed of the provisions of Title VI, and the MTA's expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Program and are required to sign the Acknowledgement of Receipt (see Appendix 1).

#### **Subcontracts and Vendors**

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

Title VI information shall be disseminated to contractor's and vendor's employees annually with payroll or pay stub envelopes. This notice reminds employees of the MTA's policy statement, and of their Title VI responsibilities in their daily work and duties.

During new employee orientation, new employees shall be informed of the provisions of Title VI, and the MTA's expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Program and are required to sign the Acknowledgement of Receipt (see Appendix 1).

County of Hawai'i  
Mass Transit Agency  
Title VI Notice

The Mass Transit Agency operates the Hele-On Bus, Kako'o Paratransit services, and Shared Ride Taxi Program without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes that she or he has been aggrieved by an unlawful discriminatory practice under Title VI must file a complaint within 180 days of the alleged occurrence to any of the following:

County of Hawai'i - Mass Transit Agency  
25 Aupuni Street (mailing Address)  
2299 Ho'olaulima Road (Physical Address)  
Hilo, Hawai'i 96720  
Phone No. (808) 961-8343

Email: [heleonbus@hawaiicounty.gov](mailto:heleonbus@hawaiicounty.gov)

In addition to the Title VI complaint process at MTA, a complainant may also file a Title VI complaint with an external entity, such as:

County of Hawai'i – Department of Human Resources  
Attention: EEO Officer/ADA Coordinator  
25 Aupuni Street  
Hilo, Hawai'i 96720  
Phone No. (808) 961-8361

Hawai'i State Department of Transportation  
Office of Civil Rights  
200 Rodgers Boulevard  
Honolulu, Hawai'i 96819  
Phone No. (808) 831-7924  
Email: [HDOT-TITLEVI@hawaii.gov](mailto:HDOT-TITLEVI@hawaii.gov)

Federal Transit Administration  
Office of Civil Rights  
Attention: Complaint Team  
East Building, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
Phone No. (888)- 446-4511

**If more information is needed in another language, please contact (808) 961-8343**

### List of Locations Where Title VI Notice Is Posted

The MTA notice to the public is currently posted at the following locations:

Location Name	Address	City
County of Hawaii Mass Transit Agency Administration Office	2299 Ho'olaulima Road, Hilo, HI 96720	Hilo
The MTA Website	<a href="http://www.heleonbus.org">www.heleonbus.org</a>	Hilo
Hele-On Operated Transit Vehicles (includes contracted vehicles)	Various Locations	Hilo/Kona/Kohala/Ka'u
Para-transit Vehicles	Various Locations	Hilo/Kona
Shared Ride Taxi Vehicles	Various Locations	Hilo
MTA Maintenance Area	2299 Ho'olaulima Road	Hilo
Mo'ohau Bus Terminal	329 Kamehameha Avenue	Hilo

### **Requirement to Develop Title VI Complaint Procedures and Complaint Form**

The Title VI Complain Procedures and Form are on the following website:

- Hawaii'i County Mass Transit Agency (MTA)  
<http://www.heleonbus.org/title-vi-of-the-civil-rights-act-of-1964>

Complaint Forms (Attachment A) are available at the following locations:

- Download from (MTA) website listed above
- Through mail or email by call (MTA) at (808) 961-8744, or emailing [heleonbus@hawaiicounty.gov](mailto:heleonbus@hawaiicounty.gov)

In-person at:

- MTA (2299 Ho'olaulima Road, Hilo)
- Mo'ohau Bus Terminal (329 Kamehameha Avenue, Hilo)

The Complaint Process displayed below has been extracted from the MTA website.

## **County of Hawai'i Hele-On Bus Title VI Policy**

The County of Hawai'i, Mass Transit Agency (MTA), as a recipient of Federal funds, will fully comply with Title VI of the Civil Rights Act of 1964. MTA is committed to ensuring that no person using public transit services is discriminated against on the basis of race, color, or national origin, particularly in the following service areas:

- Scheduling
- Quality of service
- Frequency of service
- Age and quality of vehicles assigned to routes
- Quality of stations serving different routes
- Location of routes

### **Who can file a complaint**

Anyone who believes that she or he has been discriminated against on the basis of race, color or national origin, while using the Hele-On Bus, paratransit services, or shared ride taxi program may file a Title VI complaint with MTA.

### **How to file a Title VI discrimination complaint**

If a person believes she or he has been discriminated against in using any of the Hele-On Bus programs and services, they may file a signed, written complaint within one hundred eighty (180) days of the date of alleged discrimination. If the complainant is unable to write a complaint, the MTA will provide assistance. A complaint form is available at the MTA office and on its website.

Complaints should provide the following information:

- Complainant's name, address, and contact information (telephone number, email address, etc.)
- How, when, where, and why the complainant believes he or she was discriminated against
- Location, names, and contact information of any witnesses

File the complaint in writing with MTA at:

**Mailing Address:**  
County of Hawaii  
Mass Transit Agency  
25 Aupuni Street  
Hilo, Hawai'i 96720

**Physical Address:**  
County of Hawaii  
Mass Transit Agency  
2299 Ho'olaulima Road  
Hilo, Hawai'i 96720

**Email:** [heleonbus@hawaiicounty.gov](mailto:heleonbus@hawaiicounty.gov)  
**Phone:** (808) 961-8744

**Email:** [heleonbus@hawaiicounty.gov](mailto:heleonbus@hawaiicounty.gov)  
**Phone:** (808) 961-8744

In addition to the Title VI complaint process at MTA, any person who believes she or he has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint, which must be filed within 180 days of the alleged occurrence to any of the following:

County of Hawaii  
Department of Human Resources  
Attention: EEO Officer/ADA Coordinator  
25 Aupuni Street  
Hilo, Hawai'i 96720  
Phone No. (808) 961-8361

External Entities:

Hawai'i Department of Transportation  
Civil Rights Office (OCR)  
200 Rodgers Blvd.  
Honolulu, Hawai'i 96819  
Phone: (808) 831-7924  
Email: [HDOT-TITLEVI@hawaii.gov](mailto:HDOT-TITLEVI@hawaii.gov)

Federal Transit Administration  
Office of Civil Rights  
Attention: Complaint Team  
East Building, 5th Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

A court, Federal or State

If a complaint is filed with both MTA and an external entity, the external complaint will supersede the MTA complaint and the MTA complaint procedures will be suspended until the external entity produces findings.

### **MTA Complaints Process**

Complaints that allege discrimination based on race, color, or national origin, while using any Hele-On Bus services or programs, will be assigned a complaint number by MTA.

MTA will notify the County's Equal Opportunity Officer/ADA Coordinator of the complaint.

MTA will review the Title VI complaint and will provide appropriate assistance to complainant(s), including those who have limited English proficiency (LEP).

MTA will begin investigation of a formal Title VI complaint within ten (10) working days of receiving the complaint.

If additional information is needed from the Complainant, MTA will contact the complainant in writing within fifteen (15) working days for additional information. If the complainant fails to provide the requested information by the requested date, the complaint could be administratively closed.

Based upon all of the information received, MTA will draft a written response, subject to review by its Corporation Counsel.

MTA will send the final written response to the complainant and advise the complainant of his or her right to file a complaint externally.

The complainant also will be advised of his or her right to appeal the response to Federal and state authorities as appropriate.

MTA will diligently attempt to respond to complaints within sixty (60) workdays of its receipt.

**Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits**

The MTA has not been involved in any transportation-related Title VI investigations, lawsuits or complaints for period 2018 – 2020.

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
1. None				
2.				
Lawsuits				
1. None				
2.				
Complaints				
1. None				
2.				

## Promoting Inclusive Public Participation

Promoting inclusive public participation is accomplished through MTA's Public Participation Plan (Attachment B)

MTA strives to involve all segments of our community in planning future MTA programs, services, and projects by promoting inclusive public participation. The MTA will use its available resources to employ the following strategies, as appropriate:

- ✓ Value public participation and promoting expansive involvement by members of the community;
- ✓ Encourage, frequent and continuous engagement by the public throughout the entire process;
- ✓ Outreach to populations, communities, including underserved populations and treating all members of the public fairly, considering all public input as an important component of the planning and implementation process;
- ✓ Promote partnerships among residents, business community, organizations, and public officials;
- ✓ Select accessible and varied meeting locations and times;
- ✓ Employ different meeting sizes and formats;
- ✓ Use social media in addition to other resources as a way to gain public involvement, including virtual public involvement.
- ✓ Use translated radio, newspaper ads, press releases on stations and in publications that serve Limited English Proficiency (LEP) populations;
- ✓ Providing communications and agency reports that are clear, timely and broadly distributed.

## Documented Public Outreach

The following is a summary of outreach efforts conducted by the MTA as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

Information pertinent to each event and/or activity will be provided to HDOT upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc.

The County of Hawai'i Transit and Multi-modal Transportation Master Plan (TMP) is one of MTA's projects that facilitated public participation. The TMP was finalized and delivered in August 2018. It prepared seven detailed subject studies, an on-board passenger survey, financial analyses, and public input. Two rounds of public meetings were held around Hawai'i Island to gather reaction to proposed service changes. The second round presented the Draft Master Plan:

Pahoa, April 7, 2018  
Ocean View, April 8, 2018  
Waimea, April 10, 2018  
Kona, April 12, 2018  
Kea'au, April 15, 2018  
Hilo, April 16, 2018

Modifications were made to the draft to incorporate public input.

#### Attendance at Community Events

April 13, 2018 - National Federation for the Blind and Low Vision Fair. Hosted a table providing information on paratransit service. Printed materials and assistance with application process was provided to attendees. In addition, route maps and bus schedules were provided for the public transit bus system. Attended by Tiffany Kai.

September 6, 2018 - Served as a panelist at the East Hawai'i Disability Legislative Forum. Provided printed information about the Hele-On and paratransit service, application assistance, and fielded community questions. This forum encouraged public discussion and created a venue for those who have or work with persons with disabilities to raise their concerns or give feedback about existing or lack of existing services. Attended by Tiffany Kai and Maria Aranguiz.

June 14, 2019 – National Federation for the Blind and Low Vision Fair. Teamed up with the Office of Aging in providing paratransit program information. Provided printed materials and assistance as requested. Hele-On public transit system information were also provided. Although no staff member from MTA attended, we were represented.

10/03/2019 – Served as a panelist at the East Hawai'i Disability Legislative Forum. Provided printed information about the Hele-On and paratransit service, and fielded community questions. This forum encouraged public discussion and created a venue for those who have or work with persons with disabilities to raise their concerns or give feedback about existing or lack of existing services. Attended by Brenda Carreira

October 24, 2019 – Attended West Hawai'i Disability Legislative Forum. Provided printed materials and answered public question and inquiry about our public transportation services. This forum was the East side counterpart to the West Hawai'i forum. Attended by Betty Alcover

#### Puna Hub Public Meeting

July 31, 2019. Co-hosted meeting with SSFM to provide information and gain feedback on six (6) conceivable locations in different parts of Pahoa for a hub and spoke system. A power point presentation and handouts were delivered to the audience, and a question and answer session took place. Feedback was received and presented to the Hawai'i County Council on January 8,

2020, where the public was afforded an opportunity to testify on the subject. See Appendix 2 (meeting flyer).

#### Increase of LEP Information Accessibility

July, 2020 – Redistributed Emergency Messaging Booklet for use by drivers on our public transit vehicles, including paratransit, and shared-ride taxi providers, which includes translated emergency and useful phrases in 18 of the most common languages in Hawai'i. Simultaneously re-issued use of language cards in 14 languages, which can be carried by an individual who has LEP and used to identify the interpretation services needed. These cards are located at the Mo'ohau Bus Terminal and the MTA Administrative office. Distributed written protocol and instruction for use of contracted interpreter services. These tools can be used as a safeguard to better ensure we are prepared to assist in providing meaningful access to information and communication to those who may have LEP.

#### Attendance at Invitational Events

Currently, Mass Transit uses its website, press releases, and memos to provide information to its riders. The Mo'ohau Bus Terminal as well as the Resort community assists the agency in distributing information. Riders are also able to access Aloha United Way 2-1-1 for agency information.

From time to time, MTA meets with various groups accordingly. These groups include Disability Rights Hawai'i, Community Action Network, Senior Centers, Neighborhood Communities. MTA also participates in Job Fairs, University of Hawai'i at Hilo Student Fairs, and other community fairs.

The Mass Transit Agency will continue to participate in outreach events and expand its outreach efforts. To accomplish this, MTA will be proactive and initiate vigorous engagement with its diverse communities. MTA also works with the County's Immigration Office for outreach.

## **Requirement to Provide Meaningful Access to Limited English Proficient Persons**

The Mass Transit Agency is an Equal Opportunity Provider and Employer and is firmly committed to a policy of non-discrimination. MTA affords meaningful access to its services for Limited English Proficient (LEP) persons. The 2019 LEP Plan identifies appropriate language assistance measures needed to improve access to public transit services by LEP persons.

MTA utilizes contracted phone interpretation services upon request to the maximum extent feasible and on a case by case basis. MTA has not received any request to translate any vital documents (see Safe Harbor Provisions below). The Title VI Coordinator is the designated Language Access Coordinator to efficiently and promptly respond to requests for an interpreter or a translation of County documents. Hawai'i County is currently updating its Language Access Plan (July, 2020), with a roll out in November, 2020.

The County of Hawai'i EEO/ADA Coordinator is designated as the Language Access Coordinator for implementation of the Plan and is responsible for assisting covered departments with its compliance efforts.

A copy of MTA's 2020 LAP Plan can be found at Attachment C.

### **Safe Harbor Provision**

The Mass Transit Agency complies with the Safe Harbor Provision:

The Federal Transit Authority Circular 4702.1B states:

*"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.*

*These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."*

## **Minority Representation on Planning and Advisory Bodies**

The Mass Transit Agency is not involved in the selection of members for the following committees or boards:

Transportation Commission – Nine members are appointed by Hawai'i County's Mayor and approved by the Hawai'i County Council.

Hawai'i County Council consists of a Mass Transit Committee is MTA's approving body and its nine members are elected.

## **Monitoring Sub-recipients**

HDOT will monitor its sub-recipients' compliance with FTA Title VI requirements. Oversight includes periodic on-site visits, review of submitted Title VI Plans, review of Title VI training programs and sub-recipient's agency-conducted surveys etc.

The Hawai'i County Equal Opportunity Office/American's with Disability Act Coordinator will provide the following training material to ensure all appropriate MTA staff are trained in Title VI:

- PowerPoint presentation
- Video
- Quiz

Each appropriate staff will be afforded reasonable time to complete the training. The results of the training will be reviewed with the Hawai'i County EOO/ADA Coordinator, who may provide feedback if necessary.

## **Determination of Site or Location of Facilities**

### **Title VI Equity Analysis**

A Title VI Equity Analysis is only required if the sub-recipient is planning to acquire land upon which to construct a facility or plans to construct a facility. Do not conduct the analysis unless you are planning to acquire land for this purpose or construct a facility.

A sub-recipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. "Facilities" in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. During these planning phases attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Even if facility construction is financed with non-FTA funds, if the sub-recipient organization receives any FTA dollars, it must comply with this requirement.

If the construction of the facility is funded with FTA funds, you may be subject to Environmental Justice (EJ), FTA Disadvantaged Business Enterprise (DBE), American with Disabilities Act (ADA), and Buy America requirements etc.

The County of Hawai'i Mass Transit Agency completed the construction of a new Mass Transit Agency Baseyard/Maintenance Facility in December, 2017. A Title VI Equity Analysis was conducted by a third-party consulting firm. Additionally, a Categorical Exclusion was issued.

Currently, MTA is not in the process of acquiring land upon which to construct a facility (storage facilities, maintenance facilities, etc.)

**Approval of the Title VI Program by Governing Entity**

Hawai'i County Mass Transit Agency submitted its 2020 Public Transit Title VI Program Plan to the Hawai'i County Council for approval through its Mass Transit Committee, where it was recommended for approval and transmitted to full Council vote on \_\_\_\_\_.

Mass Transit Committee Meeting Agenda & Report dated \_\_\_\_\_. Appendix 3

Hawaii County Council Order of Business dated \_\_\_\_\_. Appendix 4

Resolution No. \_\_\_\_\_: Approving the County of Hawaii Mass Transit Agency Title VI Program Plan pursuant to Federal Transit Administration Title VI Circular 4702.1B Requirements and Guidelines. Attachment D

## II. Requirements and Guidelines for Fixed Route Transit Providers

### **Requirement to Set System-wide Service Standards**

This requirement applies to all fixed route providers of public transportation service. Appendix C to 49 CFR part 21 provides in Section (3)(iii) that “no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project 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.”

System-wide Service Standards:

- Vehicle load for each mode
- Vehicle headway for each mode
- On-time performance for each mode
- Service availability

### **Service Standards**

#### **1. Vehicle Load**

*Measure: Provides service levels to prevent overcrowding and standees.*

Most of the time, Hele-On operates with sufficient frequency to provide every passenger with a seat. However, during heavy travel times or peak periods, passengers may experience standing loads on our Hilo/South Kohala routes. During this time, MTA strives to provide sufficient service so that passengers are reasonably comfortable. In 2020, due to Covid-19 and addressing social distancing, MTA was tasked to operate more than one bus on the Hilo/South Kohala Routes to accommodate ridership.

MTA works closely with its contractors to ensure passengers are not left behind due to overcrowding or overloads. Overcrowding is particularly monitored on routes daily, especially on the commuter routes: Pahoa to Hilo; Volcano to Hilo, Hilo and Pahala to the South Kohala Resorts. MTA provides bus service using 25 to 45 foot buses to minimize overcrowding and ensure that all passengers are picked up. Buses are assigned to routes based on ridership demand.

There are a number of different types of vehicles in the Hele-On bus fleet at any given time, and fleet changes are expected. Actual seating capacity and maximum number of passengers allowed by the comfort standards may change periodically.

See Attachment E Hele-On Bus Fleet

See Attachment F Robert's Hawaii Bus Fleet (contractor)

## 2. Vehicle Headway

*Measure: Provides adequate service frequency based on the corridor of operation and ridership demand.*

Vehicle headway is defined as amount of time between two vehicles traveling in the same direction on the same route. Scheduling headway across service modes and time periods is affected by the following factors, including but not limited to: ridership, route length, traffic congestion/conditions, population density, demand generators, and budget constraints.

The system-wide goal is to provide service as demand warrants based on review of ridership reports, surveys and review of performance data. The vehicle headway standard is designed to ensure that passengers have equitable wait times for transit. The peak period is defined as Monday through Friday between 3:30 a.m. and 8:00 a.m. and 3:00 p.m. to 6:00 p.m.

Hele-On operates on an in-frequent basis due to the size of the Island, funding availability and patronage of the particular route. See Attachment G.

## 3. On-time Performance

*Measure: Provides accessible and reliable transit services to Hawai'i County*

To ensure reliable services, the County of Hawai'i Mass Transit Agency aims to have an 80% on-time performance for all service modes. On-time performance is defined as a bus arriving not more than five minutes late or more than 1 minute early.

## 4. Service Availability

*Measure: Distribution of routes within an agency's service area.*

County of Hawai'i Mass Transit Agency's goal is to provide transit service to major origins and activity centers within Hawai'i County. This goal includes providing transit within ½ mile radius for 80% of Hawai'i County's population.

### **Service Policies**

#### 1. Distribution of Transit Amenities

The transit amenities policy is designed to provide the framework for the distribution of bus stop amenities equitably throughout the system. All amenities shall comply with ADA Accessibility Guidelines. When resources allow for improvements at multiple stop locations, the County of Hawai'i Mass Transit Agency will prioritize resources based on passenger activity and transfer opportunities. MTA will also recognize the amount of observed boarding versus alighting activity when siting amenities such as shelters, benches, and lighting.

In situations where the County of Hawai'i Mass Transit Agency has the authority and available resources to site new amenities at multiple bus stops, amenities will be programmed for placement at those stops based on a ridership and route frequency. Amenities may include, but are not limited to, shelters, seating, trash receptacles, lighting, and transit information displays. Other considerations include transfer opportunities, and access to major activity

nodes. While the County of Hawai'i Mass Transit Agency will use ridership to program the installation of amenities, external factors (e.g., site limitations, safety, and regulations of County or State, etc.) may dictate that amenities be installed out of order or not at all. Maintenance and replacement of existing amenities are not be subject to ridership use.

## **2. Vehicle Assignment**

The vehicle assignment procedure is designed to provide the framework for the distribution of buses in an equitable fashion throughout the Hele-On system. It is a process by which transit vehicles are assigned to routes. All vehicles used in transit service are ADA accessible that accommodate at least two wheelchairs and is also equipped with bicycle racks. Vehicle assignments are based on operating traits of the routes such as ridership, mode of service, and roadway conditions (narrow, tight turns, hills). Generally, 45 foot buses are assigned to commuter routes, high ridership, or long distance routes. The 25/35 foot buses to circular/intra community routes, routes with narrow or steep streets, tight turns, and less ridership.

ATTACHMENT A  
TITLE VI COMPLAINT FORM

**COUNTY OF HAWAI'I MASS TRANSIT AGENCY**  
**TITLE VI COMPLAINT FORM**

The County of Hawai'i Mass Transit Agency (MTA), as a recipient of Federal Funds, will fully comply with Title VI of the Civil Rights Act of 1964. MTA is committed to ensuring that no person using the Hele On Bus, paratransit service or its shared ride taxi program is discriminated against on the basis of race, color or national origin.

Please provide the following information necessary in order to process your complaint. Assistance if available upon request by calling 808-961-8744. Complete this form and mail to County of Hawaii, Mass Transit Agency, 25 Aupuni Street or deliver to: 2299 Ho'olaulima Road, Hilo, HI 96720.

**Section I**

Complainant's Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Email Address: \_\_\_\_\_

Telephone No. (Home): \_\_\_\_\_ (Business): \_\_\_\_\_

**Section II**

Are you filing this complain on your own behalf?     Yes\*                       No

\*If you answered "yes" to this questions, go to **Section III**.

If not, please supply your information here:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Email Address: \_\_\_\_\_

Relationship to the person for whom you are complaining: \_\_\_\_\_

Please explain why you have filed for a third party: \_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.     Yes                       No

**Section III**

What was the discrimination based on? (check all that apply):

- Race
- Color
- National Origin

Date of Alleged Discrimination (Month, Day, Year): \_\_\_\_\_

Please describe in detail how you were discriminated against. Name any individual(s) who was responsible. Attach addition sheets of paper if additional space is needed.

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**Section IV**

Was this complaint filed with another Federal, State, or local agency; or with a Federal or State Court?       Yes       No

If yes, check each agency complaint was filed with:

\_\_\_\_\_ Federal Agency      \_\_\_\_\_ Federal Court      \_\_\_\_\_ State Agency  
\_\_\_\_\_ State Court      \_\_\_\_\_ Local Agency      \_\_\_\_\_ Other (list) \_\_\_\_\_

Provide contact person information for the agency you also filed the complaint with:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Date Filed: \_\_\_\_\_

You may attach any written materials or other information that you think is relevent to your complaint.

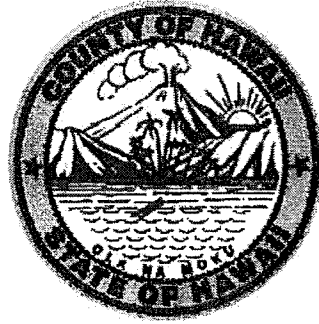
Signature and date **required** below

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Date

ATTACHMENT B  
PUBLIC PARTICIPATION PLAN

# COUNTY OF HAWAII MASS TRANSIT AGENCY



## PUBLIC PARTICIPATION PLAN

# **County of Hawaii Mass Transit Agency (MTA) Public Participation Plan**

## **Policy**

The Mass Transit Agency's Public Participation Plan is designed to secure active and representative involvement from all segments of our community in planning, programming and project implementation including Mass Transit's Multi-Modal Transportation Plan, and any future transportation services, issues, alternatives, and solutions. MTA acknowledges interagency consultation and public participation are an integral part of transportation planning and decision making process.

To accomplish this purpose, MTA will:

- Enable an early and active role for the public in the development of transportation plans and programs;
- Identify and invite a broad range of potentially affected and interested persons, with special efforts to identify Environmental Justice (EJ) populations, Limited English Proficiency (LEP), minority, and disabled community members;
- Employ different meeting sizes and formats, while tailoring techniques to meet the diverse needs of the public;
- Select accessible and varied meeting locations and times;
- Evaluate participation processes and procedures periodically so that adjustments can be made for maximum effectiveness
- Coordinate with Hawaii Department of Transportation (HDOT) statewide participation plans.

## **Project Description**

MTA will provide a clear project description to lay the foundation for a successful and achievable public participation process within the timeline, geographic area, staff and budget limitations of the overall project. This information will be used to explain the project to those persons subsequently engaged in public participation activities of the Public Participation Plan. This will also help communicate the boundaries of public participation in planning, program development or decision processes.

## **Research**

### Assess Level of Public Concern or Interest

To determine the appropriate level of public participation, it is important to assess the degree to which the public considers the issue significant. The public will become involved according to its perception of the seriousness of the issue.

The results of this worksheet will provide a general sense of the level of public participation recommended for the project. MTA may have additional questions that are important to the community to include in this assessment. In addition, a minimum level of public participation may be prescribed by regulation or federal grant requirements, in which case this worksheet might be useful in determining whether the minimum level is sufficient or a higher level should be considered. As MTA assesses public interest or concern, the minimum level of public participation will be public information and education. If any marks register at the "very high" level, careful evaluation shall be given to the level of public participation even if the average score was otherwise low.

Therefore, MTA will consider the following questions to gauge the level of public interest or concern and rate from Level 1 (low) through Level 5 (high). The assessment shall be done with all members of the project team.

## Assessing Public Interest and Concern Worksheet

Assessment Questions	Very Low Level 1	Low Level 2	Moderate Level 3	High Level 4	Very High Level 5
1. What is the anticipated level of conflict, concern, controversy, or opportunity on this or related issues?					
2. How significant are the potential impacts to the public?					
3. How much do the major stake holders care about this issue, project, or program					
4. What degree of involvement does the public appear to desire?					
5. What is the potential for public impact on the potential decision or project?					
6. How significant are the possible benefits of involving the public?					
7. How serious are the potential ramification of NOT involving the public?					
8. What level of public participation does the Transit Committee, Transportation Commission, expect?					
9. What is the possibility that the media will become interested?					
10. What is the probable level of difficulty in solving the problem or advancing the project?					
<i>Count the number of checks in each column</i>					
<i>Multiply number of checks by level number</i>					
<i>Total all 5 columns</i>					
<i>Divide by 10 to calculate desired level of Public Participation</i>					

After assessing the level of public interest or concern using the worksheet, it will be easier to plan for the appropriate level of public participation and establish effective goals. The Public Participation Spectrum below illustrates the four levels of public participation: Public Information, Public Input, Public Involvement and Public Collaboration. Each of these levels serves a different purpose with a different outcome. A public participation plan will almost always require more than one level of participation.

Based on our results from the assessment worksheet, "Public Participation Spectrum" below will be used to identify the appropriate level of public participation for our project. Note that each level has a different obligation and outcome and assessment score will be periodically reviewed and revised accordingly. ✓ Enter the average score from the Assessment Worksheet: \_\_\_\_\_

✓ Identify the public participation level using the Public Participation Spectrum below: \_\_\_\_\_

<b>Public Participation Spectrum</b>			
<b>Increasing Level of Public Participation</b>			
<b>Inform (1 - 1.9)</b>	<b>Solicit Input / Consult (2 - 2.9)</b>	<b>Involve (3 - 3.9)</b>	<b>Collaborate (4 - 4.9)</b>
One-way communication between Hawaii County and the public to provide the public with balanced and objective information to assist them in understanding the problems, alternatives, opportunities and/or solutions.	Seek public feedback on a proposal, analysis or alternatives. Requires a response from the public, but limited opportunity for public dialogue.	Work directly with the public throughout the process to ensure that issues, aspirations and concerns are consistently understood and considered. Includes elements of public information and outreach, but adds a third dimension of two-way communication.	To collaborate with the public on some or all aspects of the planning or decision including the development of alternatives and the identification of the preferred solution.
<b>Promise to the Public</b>			
We will keep stakeholders informed.	We will keep stakeholders informed, listen to and acknowledge concerns, aspirations and provide feedback on how public input influenced the decision.	We will work with stakeholders to ensure that their concerns, aspirations and issues are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to stakeholders for direct advice and innovation in formulating solutions and incorporate their recommendations into the decisions to the maximum extent possible.
<b>Example of Tools to use</b>			
<ul style="list-style-type: none"> <li>✓ Fact sheet</li> <li>✓ Press Release</li> <li>✓ Open House</li> <li>✓ Tour / Site Visit</li> </ul>	<ul style="list-style-type: none"> <li>✓ Public Meeting</li> <li>✓ Appreciative Inquiry</li> <li>✓ Focus Group</li> <li>✓ Survey</li> </ul>	<ul style="list-style-type: none"> <li>✓ Workshop</li> <li>✓ Design Charrettes</li> <li>✓ Citizen advisory committee</li> </ul>	<ul style="list-style-type: none"> <li>✓ Board-appointed commission</li> <li>✓ Special task force</li> </ul>
Adapted from the IAP2 Public Participation Spectrum			

### **Identify Public Participation Goals**

After determining the appropriate level of public participation for the project, the next step is to define goals for inviting the public to participate. Refer to the "Promise to the Public" list in the Public Participation Spectrum above to refine goals. MTA may also mix different levels of participation, along with media and public outreach components, in your goals.

MTA will consider these questions to develop goals:

Could this be an opportunity to....

- Create a better project
- Incorporate other community goals into the project
- Benefit from public input, involvement or support regarding the project
- Collaborate with citizens or organizations in overlapping areas
- Raise visibility of County government in the local community
- Enhance specific project milestones or decision processes
- Promote good news, programs or projects sponsored by Hawai'i County
- Strengthen or repair public trust

*Example goals:*

- *Gather public feedback about community desires for the ultimate future of the hub and spoke system*
- *Establish realistic expectations about the schedule for improvements to Hele-On system*
- *Provide transparent process for how public input is used in developing project alternatives*
- *Have informed participation and meaningful involvement of all citizens, focusing on underserved populations.*
- *Disseminate community input to ultimate decision makers for their consideration*

### **Identifying Stakeholders**

MTA will identify and consider the following stakeholders as part of the participation plan. Stakeholders may vary depending on the project and outcome expected.

Transit Committee

Transportation Commission

State and local agencies

CDP Action Committees

Non-profit agencies

Neighborhood and community groups

### **Participation Process**

General Provisions for Public Meetings

Public meetings will be convened as forums for interactive discussion in order to receive input from community residents.

To encourage meaningful participation by the public, MTA arrangements for public meetings will provide for the following:

- Timing - so the public comment can be considered as part of the planning process prior to final decision-making

- Promotion - to reach a broad and diverse public (use of radio, newspaper, press release, County of Hawaii website);
- Facility - locations that are accessible to people with physical disabilities and in compliance with the Americans with Disabilities Act (ADA); accessible by public transit, geographically convenient and accessible to the majority of potentially impacted and interested stakeholders; and
- Develop - strategies that promote participation and facilitate discussion by providing relevant information for public review and a viable opportunity for public comment and discussion.

The information or proposals for which public comment is sought may be presented in a variety of ways including but not limited to, display boards, handouts, and audio visual presentations. MTA will present information in a form and style to be generally understood by the public. Personnel will be available for discussing the information and for answering questions from the public. Meetings will include some format for obtaining public input by a question and answer session, survey or comment form. MTA will also use the County website as appropriate.

MTA will make every effort to accommodate persons with special needs. In addition to ensuring that the facility for public meetings is ADA compliant, MTA will provide translation services upon request and will participate in hearing relay services for individuals with hearing impairments.

### **Notification Process for Public Meetings**

MTA will use a variety of ways to notify the general public, elected officials, and representatives of agencies and organizations to attend public meetings. The following methods may be applied:

1. Legal notices in general circulating newspapers and major minority newspaper(s) at least 14 days in advance of the meetings
2. Post a notice on MTA's website at least 14 days in advance of the meetings;
3. Submit press releases to major newspapers, and public radio broadcasting systems;
4. Notify Transit Committee members, Transportation Commission members;
5. Notify EJ; LEP, Minority, and Disability organizations. Notifications will be translated into languages other than English upon request.
6. Utilize MTA's various social networks.

Notifications shall include information on the meeting subject, location, time; and invitation to participate in the public meeting. The notification will also include special accommodation requests.

### **Process for Public Comment and Response**

Comments from public meetings will be recorded, reviewed, and summarized in a document. A summary of comments will be presented to the Transit Committee and/or Transportation Commission. Changes that are significantly different and/or raise new issues from the initial item presented will be made available for public comment. The MTA Administrator will determine if additional opportunity for public comment is warranted.

Responses to public input are made directly when public input level permits, or a consolidated response is prepared for specific issues if the volume of public comment does not allow for individual responses.

MTA will post meeting material, minutes, and comments on the MTA website for public viewing. These materials will be translated into languages other than English upon request.

### **Distribution of Final Documents**

Final documents are available on agency website. Members of the public may also request a copy of our final documents by contacting MTA, if hard copy is requested fees/costs may apply. Said documents will be translated into languages other than English upon request.

ATTACHMENT C  
LANGUAGE ACCESS PLAN

# COUNTY OF HAWAII MASS TRANSIT AGENCY



## LANGUAGE ACCESS PLAN

*EFFECTIVE 7/01/2020*

## Introduction

The County of Hawai'i Mass Transit Agency and its contracted operators of public transit services, are committed to providing meaningful access to all users of Hele-On's public transit system who are Limited English Proficient ("LEP").

This Language Access Plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012 (Circular), which state that no person shall be subjected to discrimination on the basis of race, color, or national origin. This Language Access Plan also conforms to the requirements of §321C, Hawaii Revised Statutes, which codifies via statute the principles of Executive Order 13166, relating to Advancing Meaningful Access to Limited English Proficient Persons.

## Definition/Background

Executive Order 13166 goal is to improve the accessibility of services to eligible LEP persons, as goal that reinforces its equally important commitment to promoting programs and activities designed to help individuals learn English. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

Executive Order 13166, titled Improving Access to services for Persons with Limited English Proficiency, states that recipients of Federal funding must ensure that programs and activities they normally provide in English must also be accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI of the Civil Rights Act of 1964. It directs each agency/department who are recipients of Federal funding to take reasonable steps to ensure meaningful access to their programs. They must also prepare a plan to improve access, which should include steps taken to ensure that eligible LEP persons can meaningfully access programs and activities. By doing so, agencies shall draft Title VI guidance specifically tailored to it recipients that is consistent with the LEP guidance issued by the Department of Justice. This is further reinforced by §321C, Hawaii Revised Statutes, which codifies and enforces the implementation of language access planning and provision of language access services for State agencies and covered entities.

The County of Hawai'i Mass Transit Agency has developed a Language Access Plan to identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Hele-On.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available. In order to prepare this plan, the County of Hawai'i Mass Transit Agency undertook the U.S. Department of Transportation ("U.S. DOT") **Four-Factor analysis** which considers the following factors:

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

A summary of the results of the County of Hawai'i Mass Transit Agency's four-factor analysis is reflected in the following section.

### **Meaningful Access: Four-Factor Analysis**

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the County of Hawai'i Mass Transit Agency's transit activities, or services.

In 2010-2014, the island had a resident population of 189,832. There were 64,586 households residing in the county with the household size of 2.9 people. There were 83,904 housing units, 23% of which were vacant. The racial makeup of the county was 33.2% White, .7% African American, 22.1% Asian, 12.7% Native Hawaiian or other Pacific Islander, and an estimated 28.7% were two or more races; 12% of the population were Hispanics or Latinos of any race; 2.3 % some other race.

The County of Hawai'i Mass Transit Agency reviewed the 2010 - 2014 U.S. Census, American Community Survey, and determined that 81.5% spoke English only; 18.5% speak a language other than English. Of those speaking a language other than English at home, 6% speak English "less than very well". Of the total population surveyed, 2.3% speak Spanish and an estimated 0.5% of this group indicated that they speak English "less than very well". Other groups that speak other languages in Hawai'i County include, other Indo-European languages which totals 1.6% of the population, which 0.2% speak English less than very well. Asian, including Chinese, Korean, Japanese, Laotian, Thai, Cambodian, Vietnamese, and Pacific Islander amounts to 14.4% of the population. Of this amount 5.2% speaks English less than very well. Other languages totals accounts for 0.1% of the population, which 0.0% of the population speaks English less than well.

2. The frequency with which LEP persons come in contact with Hele-On transit services.

County of Hawai'i Mass Transit Agency staff reviewed the frequency with which transit administrative staff, contractors and bus operators could have contact with LEP persons. From July 2018 - date, the County of Hawai'i Mass Transit Agency has encountered a total of 5 LEP individuals in which interpretative services were used

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and no requests for translated transit program documents. Here is the breakdown by language: Japanese (2); Mandarin (1); French (1); Italian (1).

Bus and taxi operators are in regular contact with LEP persons on Hele-On transit services of which majority are Asian or Pacific Islander. All transit information is available in alternative languages via Google Translate. County of Hawai'i Mass Transit Agency staff or its contractor's staff have Asian or Pacific Islander proficiency or access to Language Link at all times.

3. The nature and importance of programs, activities, or services provided by the County of Hawai'i Mass Transit Agency to the LEP population.

Demographic data show that the County of Hawai'i Mass Transit Agency's transit riders are primarily Asian and Pacific Islander.

The majority or 84.5% of passengers surveyed were dependent on public transportation. Employment is a major reason for trip making as there are fewer employment opportunities in the rural areas of Ka'u and Puna. This emphasizes the importance of the County of Hawai'i Mass Transit Agency's Hele-On services. The County of Hawai'i Mass Transit Agency's outreach efforts must therefore ensure that transit information and other key documents are translated and user-friendly, and that bilingual staff are readily available.

4. The resources available to County of Hawai'i Mass Transit Agency and overall cost to provide LEP assistance.

Mass Transit Agency staff has access to a variety of services and resources that can help in outreaching and providing LEP assistance at low or no cost. Community and regionally-based resources include:

- County of Hawai'i Senior Centers
- County of Hawai'i Immigration
- Hawai'i County Social Services Agencies
- State of Hawai'i Department of Transportation
- Interpretation and Translation Services through Pacific Interpreters and Language Link

The above resources will be used on a regular basis or as needed to assist in identifying needs of the County of Hawai'i LEP population. They will also serve as a means to widely disseminate bilingual transit service information and announcements to notify the LEP population of planned public meetings and outreach efforts.

Based on the four-factor analysis, the County of Hawai'i Mass Transit Agency developed its Language Access Plan as outlined in the following section.

## **Identification of LEP Population**

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The County of Hawai'i Mass Transit Agency has developed several possible ways to assist in identifying LEP populations within the County of Hawai'i, including:

1. Determine whether language assistance might be needed at future events or meetings, review records to see if requests for language assistance have been received in the past, either at meetings or over the phone.
2. Have a staff person greet participants as they arrive to meetings, activities or other community events and informally engage participants in conversation to assess each attendee's ability to speak and understand English.
3. Survey vehicle operators and other front-line staff, such as Hele-On bus operators and taxi operators, on their experience concerning any contacts with LEP persons.
4. Network with local human services organizations as well as the County's Immigration Office to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about the County of Hawai'i Mass Transit Agency's programs and services.

### **Language Assistance Measures**

There are a number of language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which transit staff can respond to LEP persons, whether in person, by telephone, or in writing.

- Provide a bilingual representative at community events and public hearings.
- Placement of statements in notices and publications that interpreter services are available for these meetings upon request.
- Survey bus drivers, dispatchers, and other front-line staff on their experience concerning any contacts with LEP persons during the previous years.
- Post County of Hawai'i Mass Transit Agency Title VI Policy and Language Access plan on the Mass Transit Agency's website, [www.heleonbus.org](http://www.heleonbus.org).
- When an interpreter is needed in person or on the telephone, staff will make reasonable effort to access language assistance services from a professional translation service or qualified community volunteers.
- The overall County of Hawai'i website has the ability to translate information to different languages.
- The Mass Transit Agency and its contractors have access to Google Translate
- The County of Hawai'i is working to incorporate a blind reader and audio for those who are vision impaired.

### **Outreach Techniques**

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When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, meeting notices, flyers, agendas and all supporting will be printed in an alternative language based on the known LEP population, upon request. Interpreters will be available as needed. The County of Hawai'i Mass Transit Agency currently uses a variety of outreach approaches, as described below.

### Public Outreach Activities

The County of Hawai'i Mass Transit Agency website contains comprehensive information on its program and services offered. The administrative staff of the Mass Transit Agency provides easy access to bilingual translation during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the Hele-On bus program and services.

The County of Hawai'i Mass Transit Agency reaches out to the community directly through meetings with agency staff and their contractors, as needed. Information regarding the Mass Transit Agency's transit services is disseminated at these meetings, including schedules and appropriate information. Transit information also is made available at a variety of locations throughout the community. The Mass Transit Agency may also use the County Immigration Office and the Resort businesses as a liaison to disseminate information.

### Public Meetings

The County of Hawai'i Mass Transit Agency conducts and participates in transit meetings that are open to the general public. The Mass Transit Agency collaborates with the State of Hawai'i Department of Transportation, and other government departments/agencies relating to public transit services.

The Mass Transit Agency's administrative staff also participates in the development of the State's Department of Transportation Hawai'i Statewide Transportation Plan and Statewide Transportation Improvement Program. The Mass Transit Agency hosts a series of meetings that are conducted with participants throughout the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the State.

### Participation in Community Activities

The County of Hawai'i Mass Transit Agency engages in community activities that promote its transit services. These activities and sites include:

- County of Hawai'i Community/Civic Events (Community Development Plans)
- County of Hawai'i Senior Centers
- Big Island Workforce Development
- Employment and Job Fairs
- University of Hawai'i at Hilo Student Fairs

*EFFECTIVE 7/01/2020*

➤ Disability Forums

**Assurances**

The County of Hawai'i Mass Transit Agency will ensure that no person, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, will have equal access to services provided as to English speaking individuals. Further, the public will be notified of protections against discrimination afforded them by Title VI regulations and will take preventive corrective and disciplinary action necessary to stem behavior that violates the rights and privileges the regulations are designed to protect. The County of Hawai'i Mass Transit Agency also ensures that appropriate language access services will be provided as is consistent with §321C, Hawaii Revised Statutes.

**Monitoring and Updating the Language Access Plan**

The County of Hawai'i Mass Transit Agency will update the Language Access Plan as required by U.S. DOT and §321C, Hawaii Revised Statutes. At a minimum, the plan will be reviewed and updated when data the U.S. Census is available, or upon objective evidence that an increase of LEP individuals are present in the transit service area. Updates will include the following:

**Documentation of LEP Personal Contacts**

- Determination of the current LEP population in the service area.
- Test whether the need for translation services has changed.
- Assess if the language assistance programs have been effective and sufficient to meet the need.
- Determine whether the County of Hawai'i Mass Transit Agency has fully complied with the goals of this Language Access Plan.
- Grade how the needs of LEP persons have been addressed.
- Investigate whether complaints have been received concerning the County of Hawai'i Mass Transit Agency's failure to meet the transit needs of LEP individuals.

**Availability of Title VI Plans and Procedures**

The County of Hawai'i Mass Transit Agency's Language Access Plan and the Title VI procedures are included in the County of Hawai'i Mass Transit Agency's website at [www.heleonbus.org](http://www.heleonbus.org). Any person or agency with internet access will be able to access and download the plan from the Mass Transit Agency's website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person. LEP individuals may request copies of the plan in translation which the County of Hawai'i Mass Transit Agency will provide, if feasible.

Questions or comments regarding the Language Access Plan may be submitted to:

County of Hawai'i Mass Transit Agency

*EFFECTIVE 7/01/2020*

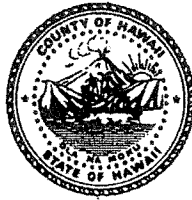
25 Aupuni Street (mailing address)  
2299 Ho'olaulima Road (physical address)  
Hilo, HI 96720  
Telephone: (808) 961-8343  
Email: [heleonbus@hawaiicounty.gov](mailto:heleonbus@hawaiicounty.gov).

***EFFECTIVE 7/01/2020***

ATTACHMENT D

HAWAI'I COUNTY COUNCIL RESOLUTION

COUNTY OF HAWAI'I



STATE OF HAWAI'I

RESOLUTION NO. \_\_\_\_\_

**A RESOLUTION APPROVING THE COUNTY OF HAWAI'I MASS TRANSIT AGENCY TITLE VI PLAN PURSUANT TO THE FEDERAL TRANSIT ADMINISTRATION TITLE VI CIRCULAR 4702.1B REQUIREMENTS AND GUIDELINES**

**BE IT RESOLVED BY THE COUNCIL OF THE COUNTY OF HAWAI'I.**

**WHEREAS**, Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq.) prohibits discrimination on the basis of race, color or national origin for recipients of federal financial assistance; and

**WHEREAS**, the Mass Transit Agency (MTA), as a recipient of Federal Transit Administration ("FTA") financial assistance to provide public transportation, must prepare and submit to the FTA a Title VI Plan that is compliant with FTA Circular 4702.1B Title VI Requirements and Guidelines for FTA Recipients ("Circular"); and

**WHEREAS**, the MTA prepared the attached 2020 Title VI Plan in compliance with the requirements set forth in the Circular and reported that the MTA provides public transportation in conformance with Title VI legislation that prohibits discrimination on the basis of race, color, or national origin; and

**WHEREAS**, the 2020 Title VI Plan must be approved by the County's governing entity, the Hawai'i County Council, prior to submission to the FTA, pursuant to the Circular's Requirements and Guidelines; now therefore,

**BE IT RESOLVED BY THE COUNCIL OF THE COUNTY OF HAWAI'I**, in accordance with Article III, Section 3-1 of the Hawai'i County Charter, the County of Hawai'i,

that the 2020 Title VI Plan, attached hereto and which by reference is made a part hereof, be approved; and

**BE IT FURTHER RESOLVED** that MTA Administrator can make minor or editing changes to the 2020 Title VI Plan; attached hereto, provided no substantial additions or deletions may be made; and

**BE IT FINALLY RESOLVED** that a copy of this resolution be forwarded to:  
(1) Mayor Mitchell D. Roth; (2) Mass Transit Agency Administrator Brenda Carreira; and (3) Malia Hall, Deputy Corporation Counsel, Office of the Corporation Counsel.

Dated at \_\_\_\_\_, Hawai'i, this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

INTRODUCED BY:

\_\_\_\_\_  
COUNCIL MEMBER, COUNTY OF HAWAI'I

ATTACHMENT E  
HELE-ON BUS FLEET

MASS TRANSIT AGENCY BUS FLEET

	Bus #	License #	Serial No.	Description/Model	Seat Capacity	ADA Lift/ramp
1	54	CH2654	1GBDV13W27D214570	2007 Chevy Pvan	5	yes
2	106	CH3468	1GB6G5BG4D1114584	2013 Chevy	14	yes
3	107	CH3494	1FDUF5GT5KDA27747	2019 Ford F-350 Cut aways Minibus	25	yes
4	108	CH3493	1FDUF5GTXKDA25153	2019 Ford F-350 Cut aways Minibus	25	yes
5	109	CH3498	1FDUF5GT1KDA25154	2019 Ford F-350 Cut aways Minibus	25	yes
6	110	CH3497	1FDUF5GT7KDA27748	2019 Ford F-350 Cut aways Minibus	25	yes
7	111	CH3606	1FDXE45S97DA56079	2007 E-350 Minibus		yes
8	341	CH3437	15GCD211XV1088134	1997 Gillig Phantom	45 + 19	yes
9	342	CH3439	15GCD2111V1088135	1997 Gillig Phantom	45 + 19	yes
10	344	CH3436	15GCD2115V1088137	1997 Gillig Phantom	45 + 19	yes
11	345	CH3435	15GCD2117V1088138	1997 Gillig Phantom	45 + 19	yes
12	346	CH3434	15GCD2119V1088139	1997 Gillig Phantom	45 + 19	yes
13	347	CH3433	15GCD2115V1088140	1997 Gillig Phantom	45 + 19	yes
14	402	CH1974	15GDD2015Y1110650	2000 Gillig	45 + 19	yes
15	405	CH1977	15GDD2017Y1111136	2000 Gillig	45 + 19	yes
16	406	CH2503	15GCD291951112492	2005 Gillig	45 + 19	yes
17	408	CH2505	15GCD291251112494	2005 Gillig	45 + 19	yes
18	409	CH2582	15GCD211171112534	2007 Gillig	45 + 19	yes
19	410	CH2650	15GCD211371112535	2007 Gillig	45 + 19	yes
20	411	CH2581	15GCD211571112536	2007 Gillig	45 + 19	yes
21	412	CH2653	15GCD211771112537	2007 Gillig	45 + 19	yes
22	413	CH2652	15GCD211971112538	2007 Gillig	45 + 19	yes
23	601	CH3051	1M8SDMEAXAP059234	2010 MCI	50	yes
24	602	CH3052	1M8SDMEA1AP059235	2010 MCI	50	yes
25	604	CH3054	1M8SDMEA5AP059237	2010 MCI	50	yes
26	605	CH3055	1M8SDMEA7AP059238	2010 MCI	50	yes
27	608	CH3079	1M8SDMBA3DP012748	2013 MCI	50	yes
28	610	CH3204	1M8SDMBA1EP013205	2014 MCI	50	yes
29	611	CH3203	1M8SDMBA3EP013206	2014 MCI	50	yes
30	612	CH3233	1M8SDMBA0FP013908	2015 MCI	50	yes
31	613	CH3234	1M8SDMBA2FP013909	2015 MCI	50	yes
32	667	CH3212	15GCD2013S1085959	1995 Gillig	45 + 19	yes
33	699	CH3217	15GCD2011S1085958	1995 Gillig	45 + 19	yes
34	701	CH3069	SFET4A727AGN12294	2010 Alexander Dennis DD	90	yes
35	702	CH3461	SFET222184GN11721	2004 Alexander Dennis DD	90	yes

# ATTACHMENT F

## ROBERT'S HAWAI'I BUS FLEET

## Roberts Hawaii Hele On Fleet Roster

VEHICLE #	YEAR	MAKE	MODEL	LENGTH OF BUS	SEATING CAPACITY	# WHEELCHAIR POSITION
RC207	2014	MCI	J4500	45'	56	2
RC212	2014	MCI	J4500	45'	56	2
RC213	2014	MCI	J4500	45'	56	2
RC214	2014	MCI	J4500	45'	56	2
RC215	2014	MCI	J4500	45'	56	2
RC216	2014	MCI	J4500	45'	56	2
RC217	2014	MCI	J4500	45'	56	2
RC218	2014	MCI	J4500	45'	56	2
RC219	2014	MCI	J4500	45'	56	2
RC220	2014	MCI	J4500	45'	56	2
RC221	2015	MCI	J4500	45'	56	2
RC222	2015	MCI	J4500	45'	56	2
RC223	2015	MCI	J4500	45'	50	2
RC224	2015	MCI	J4500	45'	56	2
RC225	2015	MCI	J4500	45'	56	2
RC232	2015	MCI	J4500	45'	56	2
RC233	2015	MCI	J4500	45'	56	2
RC234	2015	MCI	J4500	45'	56	2
RC235	2015	MCI	J4500	45'	56	2
C617	2000	MCI	600E COACH	45'	54	2
C624	2000	MCI	600E COACH	45'	54	2
C629	2000	MCI	600E COACH	45'	54	2
C635	2001	MCI	600E COACH	45'	62	2
C640	2001	MCI	600E COACH	45'	60	2
RV204	2013	FORD	E350	28'	14	1
RM108	2015	FORD	F550	28'	21	1
RV225	2013	FORD	E450	28'	16	1
8011	2012	FORD	E450	26'	17	1
8010	2012	FORD	E450	26'	17	1

ATTACHMENT G  
VEHICLE HEADWAYS

<b>Routes</b>	<b>Service Hours</b>	<b>Vehicle Headways</b>
Intra Hilo Waiakea-Uka	Monday-Saturday from 7:05 a.m. to 4:45 p.m.	1.5 to 3 hours
Intra Hilo Keaukaha	Monday-Saturday from 7:00 a.m. to 5:00 p.m.	60 minutes
Intra Hilo Kaumana	Monday-Saturday from 7:15 a.m. to 5:20 p.m.	1 to 2.5 hours
Ka'u-Volcano-Hilo	Monday-Saturday from 6:10 a.m. to 10:40 a.m. and 1:40 p.m. to 6:55 p.m.	1 to 2.5 hours. Only 1 round trip operate between Ocean View and Hilo
Seaview-Pahoa-Hilo	Monday-Friday from 5:20 a.m. to 10:45 p.m. Saturday from 6:05 a.m. to 9:05 p.m.	40 minutes to 1.5 hours on weekdays with 3 trips continuing to Seaview. 4 hours on Saturday with 2 trips continuing to Seaview.
Honoka'a-Hilo	Monday-Saturday: from 5:50 a.m. to 5:45 p.m.	3 trips Monday-Friday 2 trips Monday-Saturday
Waimea-Hilo	Monday-Saturday at 11:00 a.m.	1 trip Monday-Saturday
Hilo-Waikoloa Village	Monday-Friday at 12:00 p.m.	1 trip Monday-Friday
Kona-Hilo	Monday-Saturday from 3:35 a.m. to 7:00 p.m.	3 trips Monday-Saturday
Hilo-South Kohala Resorts	Daily from 3:30 a.m. to 1:05 a.m.	10-30 minutes during peak period. 1 midday and 1 evening trip westbound and 1 morning and 1 evening trip eastbound after peak hours
Ka'u – Ocean View Extension	Monday-Friday at 5:30 p.m.	1 trip Monday-Friday
Waimea Shuttle	Monday-Saturday from 6:30 a.m. to 5:30 p.m.	60 minutes
Waikoloa Village-South Kohala Resorts-Waimea	Monday-Saturday from 5:20 a.m. to 8:45 a.m. and 12:30 p.m. to 4:10 p.m.	35 minutes to 1.5 hours with 1 round trip to Waimea and South Kohala Resorts
Waimea-Waikoloa Village Extension	Monday-Friday from 7:15 a.m. to 8:00 a.m. and 3:20 p.m. to 4:10 p.m.	1 trip Monday-Friday
Pahala-Kona-South Kohala	Daily from 3:30 a.m. to 11:30 a.m. and 2:30 p.m. to 7:35 p.m. Only one trip operates on Sundays and holidays.	2 to 3 hours. 1 round trip continues to Kona International Airport at Keahole and not South Kohala Resorts
Intra Kona	Monday-Saturday from 6:45 a.m. to 6:25 p.m. (7:40 p.m., Monday-Friday)	1 to 2.5 hours
North Kohala-South Kohala	Monday-Saturday and Holidays from 6:20 a.m. to 7:40 a.m. and 4:15 p.m. to 5:35 p.m.	1 round trip
North Kohala-Waimea-Kailua-Kona	Monday-Friday from 6:45 a.m. to 9:50 a.m. and 1:35 p.m. to 4:55 p.m. Saturday from 9:15 a.m. to 11:45 a.m. and 2:30 p.m. to 4:35 p.m.	1 round trip operates with no service to Waimea on Saturday
Kona – Waimea Extension	Monday – Friday	1 trip; 1.25 hours

## APPENDICES

1. Title VI Acknowledgement Form
2. Pahoa Hub Meeting Flyer
3. Hawai'i County Council Meeting Agenda
4. Hawai'i County Council Order of Business

**TITLE VI PROGRAM RECEIPT AND ACKNOWLEDGEMENT FORM**

This Title VI Program Receipt and Acknowledgement Form is meant to protect the County of Hawaii from liability. This form provides documentation of an employee's acknowledgment that the employee has received the Mass Transit Agency's Title VI Program and that the employee agrees and understands the rules and policies set forth. Requiring an employee to sign this form helps protect the Mass Transit Agency from a claim that an employee was not aware of a Title VI Program. This will be kept by the Human Resources Department in the employee's file.

I, \_\_\_\_\_ (employee's full name)

Hereby confirm that I have received and read the Title VI Program. I understand that it describes the policies of the Title VI Civil Rights Act of 1964, as amended.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

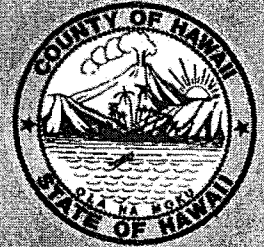


# PAHOA HUB COMMUNITY MEETING

**WEDNESDAY, JULY 31, 2019**  
**at 5:30 P.M.**



Pahoa Neighborhood Facility  
15-3022 Kauhale St.  
Pahoa, Hawaii 96778



MTA is planning to increase bus service in the Puna District and convert to a hub and spoke system. What this means is: there are two types of routes (spokes) that meet at a central location (hub) where passengers can transfer from one to the other.

- The long routes such as Route 40 would run direct from the Pahoa hub to Hilo using large buses.
- New circulator routes would travel within communities include: Hawaiian Beaches-Nanawale-Seaview; Hawaiian Paradise Park-Ainaloa-Orchidland. The circulators would use smaller buses and continue throughout the day.

Six alternate locations in different parts of Pahoa have been identified for the hub. This meeting will discuss each of them.

**For further information please call Jo-Anna Herkes (SSFM)**  
**at (808) 277-7631**

**SSFM**  
International

To request a copy of this document or an invitation to attend the event, please contact:  
JO-ANNA HERKES | PH (808) 277-7631 | Email: [joanna@ssfm.com](mailto:joanna@ssfm.com)  
at least 7 days prior to the event.