Milwaukee County Transit System
2026 Title VI Program



August 1, 2026
Milwaukee, Wisconsin

This document is a collection of various memos and reports relating to MCTS's ongoing efforts towards the following goals.

- Ensure that public transportation services are provided in a non-discriminatory manner.
- Promote full and fair participation in public transportation decision making without regard to race, color, or national origin.
- Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

Because this update is a collection of various documents, each with their own numbering system, a unified numbering system will appear in the upper right corner of each page for the reader's convenience. These numbers will be prefixed with an "A" , will correspond with the page numbers shown in the Table of Contents below, and will include the section title above the page number.



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Milwaukee County Transit System
Interoffice Memorandum

TO: Steve Fuentes, President & CEO

FROM: Jesus Ochoa, Director of Service Development
Daniel Adams, Planning Manager

SUBJECT: Executive Summary - 2026 MCTS Title VI Program Update

DATE: April 15, 2026

OVERVIEW

The MCTS 2026 Title VI Program Update represents an update of the 2026 Title VI plan submitted by Milwaukee County to the Federal Transit Administration (FTA). FTA Circular 4702.1B sets forth the guidelines for providing information on the non-discriminatory provision of transit services as required by Title VI of the Civil Rights Act of 1964. The Update includes ten general reporting requirements and five specific requirements that are mandated for transit providers:

GENERAL REPORTING REQUIREMENTS

Per the FTA guidance, there are several reporting requirements that, collectively, represent a transit agency's commitment to delivering meaningful access to transit services in a non-discriminatory manner. The required elements are listed below:

- Title VI Notice to the Public
- Title VI Complaint Procedures and Form
- Summary of Title VI Complaints
- Public Participation Plan
- Public Outreach & Involvement Activities
- Limited English Proficiency Plan
- Minority Representation on Planning and Advisory Bodies
- Monitoring of Sub Recipient Title VI programs
- Approval of Title VI Program by Governing Entity
- Policy Definitions for Major Service Change, Disparate Impact, and Disproportionate Burden

ADDITIONAL REQUIREMENTS FOR TRANSIT PROVIDERS

In addition to the reporting requirements noted above, the MCTS Title VI Plan includes service standards and policies, demographic data of minority and low-income populations served, Title VI monitoring program, public engagement process regarding major service change policy, disparate impact policy and disproportionate burden policy and finally, results of recent service and fare equity analyses.

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2026 TITLE VI PROGRAM UPDATE: SERVICE AND FARE EQUITY ANALYSES

- Fare Equity Analysis for Proposed Fare Cap Increase in 2025
- Fare Equity Analysis for Proposed Fare and Fare Cap Increase in 2026
- Fare Equity Analysis for Introduction of Contactless Payment in 2026
- SAFE Analysis for Addition of Fuller Route 1 - 2024
- SAFE Analysis for Addition of Fuller Route 2 – 2024
- SAFE Analysis for MOVE 2025 System Changes – 2025
- SAFE Analysis for Service and Routing Changes - 2026

CONCLUSION

As a recipient of FTA funds, MCTS must comply with Title VI of the Civil Rights Act of 1964, the U.S. Department of Transportation's implementing regulations at 49 CFR Part 21, and FTA's Title VI Circular 4702.1B. Through the successful implementation of the 2026 Title VI Program Update, MCTS will be able to ensure that transit services are provided in a non-discriminatory manner in Milwaukee County. It should be noted that the Milwaukee County Executive and the Milwaukee County Board of Supervisors are working to address transportation funding gaps. MCTS will continue to support these efforts in every way possible.

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Milwaukee County Transit System
Interoffice Memorandum

TO: File

FROM: Dan Adams, Planning Manager

SUBJECT: Title VI Notice to the Public

DATE: April 1, 2026

The Federal Transit Administration (FTA) requires transit providers display a notice to the public informing customers of their rights under Title VI. At a minimum, this notice must be posted on Milwaukee County Transit System's (MCTS) website and in the public areas of MCTS' offices and facilities.

An example of MCTS' notice to the public is shown on the next page. This notice is available on MCTS' website (https://www.ridemcts.com/accessibility/title-vi), in the lobby of MCTS' Administration Building, and in the vestibules of MCTS' operating stations which are open to the public. This notice is also displayed on the MCTS Transit Guide, on printed Route Schedules (where space permits) and on the interior of all MCTS buses.

This notice is also available in Spanish, the language spoken by the Limited English Proficient (LEP) population that meets the Safe Harbor Threshold in the Milwaukee area.

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Tools Menu

Title VI of the Civil Rights Act of 1964

"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."

The Milwaukee County Transit System (MCTS) respects civil rights and operates its programs and services without regard to race, color or national origin. MCTS is committed to complying with Title VI requirements in all of its programs and services.

For more information on the Title VI transit obligations, contact MCTS 8:00 a.m. - 4:30 p.m. Monday-Friday as listed below:

MCTS Human Resources Department
1942 North 17th Street
Milwaukee, WI 53205
414-344-4550 or 711 (TRS)
Title6@MCTS.org

Making a Title VI Complaint
Any person who believes he/she has been subjected to discrimination in the delivery of or access to public transportation services on the basis of race, color or national origin, may file a complaint with Milwaukee County Transit System (MCTS). Such complaint must be filed in writing with MCTS no later than 180 days after the alleged discrimination. You can file your complaint using this form. Once completed, you can print the form and mail to MCTS at the address below.

Title VI Complaint Procedures

For more information on how to file a complaint, contact MCTS as listed below:

MCTS Human Resources Department
1942 North 17th Street
Milwaukee, WI 53205
414-344-4550 or 711 (TRS)
Title6@MCTS.org

2023 MCTS Title VI Program Update

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1942 North 17th Street • Milwaukee, Wisconsin • 53205-1697
(414) 344-4550 • RideMCTS.com

Política del Título VI

"No se le negará a ninguna persona que resida en Estados Unidos la participación o beneficios, por motivo de su raza, color u origen nacional, ni será discriminada en ningún programa o actividad que reciba asistencia financiera federal".

Milwaukee County Transit System (MCTS) respeta los derechos civiles y opera sus programas y servicios independientemente de la raza, el color u origen nacional. El MCTS se compromete a cumplir con los requisitos del Título VI en todos sus programas y servicios. Para obtener más información acerca de las obligaciones de tránsito contenidas en el Título VI comuníquese con el MCTS como se indica a continuación.

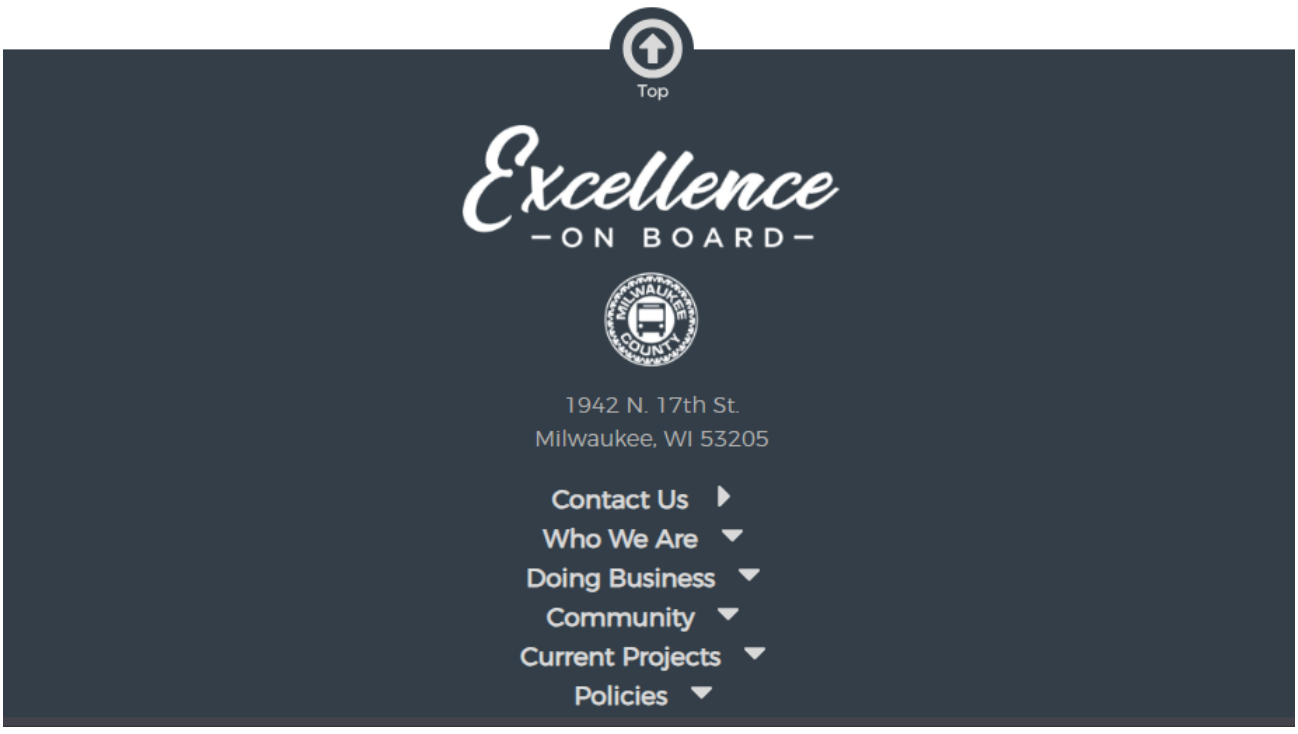
CÓMO REALIZAR UN RECLAMO CONFORME AL TÍTULO VI

Toda persona que crea que ha sufrido un acto de discriminación al momento de prestársele o de recibir el servicio de transporte público en base a su raza, color u origen nacional puede presentar un reclamo al Milwaukee County Transit System (MCTS). El reclamo debe presentarse por escrito al MCTS antes de transcurridos 180 días posteriores al supuesto acto de discriminación. Para obtener más información acerca de cómo presentar un reclamo, comuníquese con el MCTS como se indica a continuación:

MCTS Human Resources Department
1942 North 17th Street
Milwaukee, WI 53205
414-344-4550 or 711 (TRS)
Title6@MCTS.org

Formulario de Queja de MCTS por el Título VI.

Procedimientos de Queja para el Título VI



MILWAUKEE COUNTY TRANSIT SYSTEM (MCTS)

Title VI Complaint Procedures

Title VI of the Civil Rights Act of 1964 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."

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color or national origin may file a written complaint with the Human Resources Department, Milwaukee County Transit System, 1942 North 17th Street, Milwaukee, WI 53205. Complainants have the right to complain directly to the appropriate Federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the MCTS representative may be utilized for resolutions.

PROCEDURE

1. The complaint must include the following:
   a. Complaint shall be in writing and signed by the complainant(s). In cases where Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The MCTS representative will interview the Complainant and assist the person in converting verbal complaints in writing. All complaints must, however, be signed by the Complainant or his/her representative.
   b. Include the date(s) of the alleged act of discrimination.
   c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
   d. Federal law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the MCTS representative will determine its jurisdiction, acceptability, need for additional information, and investigate the complaint, if accepted.
3. The Complainant will be provided with a written acknowledgment that MCTS has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
   a. The complaint must be filed within 180 days of the alleged occurrence.
   b. The allegation must involve a covered basis such as race, color or national origin.
   c. The allegation must involve a MCTS service, the County of Milwaukee as a Federal-aid recipient, or its sub-recipient.
5. A complaint may be dismissed for the following reasons:
   a. The Complainant requests the withdrawal of the complaint.
   b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
   c. The Complainant cannot be located after reasonable attempts.

6. MCTS representative will prepare an investigative report within 90 calendar days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
7. The investigative report and its findings will be reviewed with MCTS officials and in some cases the investigative report and findings will be reviewed by MCTS' legal counsel.
8. The MCTS representative/legal counsel will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
    a. In the event MCTS is in noncompliance with the Title VI regulations, remedial actions will be listed. MCTS will take necessary action in order to come into compliance.
    b. If the investigation concludes that MCTS is not in violation of Title VI, findings describing compliance will be documented.
9. Notice of the MCTS representative's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
    a. The MCTS representative will reconsider the determination if new facts come to light.
    b. If Complainant is dissatisfied with the determination and/or resolution set forth by the MCTS representative, the same complaint may be submitted to the FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 200 W. Adams Street, Suite 320, Chicago, IL 60606, telephone 312-353-3855.
10. A copy of the complaint and the MCTS representative's investigation report/letter of finding and Final Remedial Action Plan, if appropriate, will be issued to FTA within 120 days of the receipt of the complaint.
11. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

SISTEMA DE TRÁNSITO DEL CONDADO DE MILWAUKEE (MCTS)

Procedimientos de Queja para el Título VI

El Título VI de la Ley de Derechos Civiles de 1964 dice que *"ninguna persona en los Estados Unidos será excluida de la participación en ningún programa o actividad que recibe ayuda financiera federal, ni le serán negados los beneficios correspondientes a dichos programas o actividades, ni estará sujeta a discriminación bajo estos programas o actividades, en base a su raza, color u origen nacional".*

Toda persona que crea que, individualmente o como miembro de cualquier clase específica de personas, ha estado sujeta a discriminación en base a su raza, color u origen nacional podrá presentar una queja escrita ante el Departamento de Recursos Humanos del Sistema de Tránsito del Condado de Milwaukee, 1942 North 17th Street, Milwaukee, WI 53205. Los reclamantes tienen derecho a quejarse directamente a la agencia federal apropiada. Se harán todos los esfuerzos para lograr una resolución pronta de las quejas. Podrá usarse la opción de una o varias reuniones entre las partes afectadas y el representante de MCTS para las resoluciones.

PROCEDIMIENTO

1. La queja deberá incluir los siguientes elementos:
   a. La queja será por escrito y estará firmado por el o los reclamantes. En casos en que el Reclamante no puede o es incapaz de brindar una declaración escrita, podrá hacerse una queja verbal. El representante de MCTS entrevistará al Reclamante y ayudará a la persona a poner las quejas verbales por escrito. Sin embargo, todas las quejas deberán estar firmadas por el Reclamante o su representante.
   b. La o las fechas del supuesto acto de discriminación.
   c. Deberá presentar una descripción detallada de los asuntos, incluyendo nombres y puestos de trabajo de las personas percibidas como partes en la queja.
   d. La ley federal exige que las quejas sean presentadas dentro de los 180 días naturales posteriores al supuesto incidente.
2. Al recibir la queja, el representante de MCTS determinará su jurisdicción, su aceptabilidad, la necesidad de información adicional e investigará la queja, si es aceptada.
3. Se le brindará al Reclamante un acuse de recibo por escrito de que MCTS ha aceptado o ha rechazado la queja.
4. Una queja deberá cumplir con los siguientes criterios para ser aceptada:
   a. La queja deberá ser presentada dentro de los 180 días posteriores al supuesto incidente.
   b. La acusación deberá involucrar una base que está cubierta, como raza, color u origen nacional.
   c. La acusación deberá involucrar un servicio de MCTS, el Condado de Milwaukee como un receptor de ayuda federal, o su sub-receptor.
5. Una queja podrá ser descartada por las siguientes razones:
   a. El Reclamante solicita retirar la queja.
   b. El Reclamante no responde a repetidos pedidos de información adicional necesaria para procesar la queja.
   c. El Reclamante no puede ser localizado luego de intentos razonables.

6. El representante de MCTS preparará un informe de investigación dentro de los 90 días naturales posteriores a la aceptación de la queja. El informe incluirá una descripción narrativa del incidente, la identificación de las personas entrevistadas, resultados y recomendaciones para su solución.
7. El informe de investigación y sus resultados serán revisados por oficiales de MCTS, y en algunos casos el informe de investigación y sus resultados serán revisados por el asesor legal de MCTS.
8. El representante/asesor legal de MCTS tomará una decisión con relación a la solución de la queja. Las soluciones de la queja serán indicadas de la siguiente forma:
    a. En caso que MCTS esté incumpliendo las reglamentaciones del Título VI, se indicarán medidas correctivas. MCTS tomará la acción necesaria a fin de lograr el cumplimiento.
    b. Si la investigación llega a la conclusión de que MCTS no está violando el Título VI, los resultados que describen el cumplimiento serán documentados.
9. La notificación de la determinación del representante de MCTS será enviada por correo al Reclamante. La notificación incluirá información relacionada con los derechos de apelación del Reclamante junto con instrucciones para iniciar dicha apelación. La notificación de apelaciones son como sigue:
    a. El representante de MCTS reconsiderará la determinación si salen a luz nuevos hechos.
    b. Si el Reclamante está insatisfecho con la determinación y/o resolución estipulada por el representante de MCTS, dicha queja podrá ser presentada a la Administración Federal de Tránsito (FTA) para su investigación. Se le aconsejará al Reclamante que contacte a la Administración Federal de Tránsito, Oficina de Derechos Civiles, 200 W. Adams Street, Suite 320, Chicago, Il. 60606, teléfono 312-353-3855.
10. Una copia de la queja y el informe de investigación/carta de resultado del representante de MCTS y el Plan de Medida Correctiva Final, si corresponde, serán enviados a la FTA dentro de los 120 días posteriores a la recepción de la queja.
11. Un resumen de la queja y su resolución serán incluidos como parte de las informaciones relacionadas con el Título VI a la FTA.

MCTS Title VI Complaint Form

Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations require that *no person in the United States shall, on the grounds of race, color, national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."*

The following information is necessary to assist us in processing your complaint. Assistance is available upon request. If information is needed in another language, then please contact us at 414-937-3218 or Title6@mcts.org.

Please complete and return this form to the following: Human Resources Department Milwaukee County Transit System, 1942 North 17th Street, Milwaukee, WI 53205-1697, or email to Title6@mcts.org.

1. Complainant's Name _____

2. Address _____

3. City _____ State _____ Zip _____

4. Telephone Number (home) _____ (business) _____

5. Email Address _____

6. Person discriminated against (if someone other than the complainant)

   Name _____

   Address _____

   City _____ State _____ Zip _____

7. In your own words, describe your complaint. You should include specific details such as names, dates, time, route numbers, witnesses and any other information that would assist us in our investigation of your allegations. If you have additional documentation related to this complaint, please include as an attachment. Please use the back of this form if additional space is required.

   _____

   _____

   _____

   _____

   _____

8. Have you filed this complaint with any other federal, state or local agency; or with any federal or state court? Yes ☐ No ☐

   If yes, check each box that applies:

   Federal agency ☐ Federal court ☐ State agency ☐ State court ☐ Local agency ☐

9. Please provide information about a contact person at the agency/court where the complaint was filed.

   Name _____

   Address _____

   City _____ State _____ Zip _____

   Telephone Number _____ Email address _____

10. Signature required below.

_____ _____

Complainant's Signature Date

Formulario de Queja de MCTS por el Título VI

El Título VI de la Ley de Derechos Civiles de 1964 y estatutos y reglamentos relacionados contra la discriminación estipulan que *ninguna persona en los Estados Unidos será excluida de la participación en ningún programa o actividad que recibe ayuda financiera federal, ni le serán negados los beneficios correspondientes a dichos programas o actividades, ni estará sujeta a discriminación bajo estos programas o actividades, en base a su raza, color u origen nacional".*

La siguiente información es necesaria para ayudarnos a procesar su queja. Hay ayuda disponible si la solicita. Si se necesita información en otro idioma, contáctenos al 414-937-3218 o por Title6@mcts.org.

Complete por favor este formulario y devuélvalo a la siguiente dirección: Departamento de Recursos Humanos Milwaukee County Transit System, 1942 North 17th Street, Milwaukee, WI 53205-1697, o envíe un e-mail a Title6@mcts.org.

1. Nombre del reclamante _____

2. Dirección _____

3. Ciudad _____ Estado _____ Zip _____

4. Teléfono (hogar) _____ (trabajo) _____

5. E-mail _____

6. Persona que ha sido discriminada (si es distinta del reclamante)

   Nombre _____

   Dirección _____

   Ciudad _____ Estado _____ Zip _____

7. Con sus propias palabras, describa su queja. Deberá incluir detalles específicos, como nombres, fechas, horario, número de ruta, testigos y toda otra información que nos podría ayudar en nuestra investigación de sus acusaciones. Si tiene documentación adicional relacionada con esta queja, inclúyala por favor como un adjunto. Use por favor el dorso de este formulario si necesita espacio adicional.

   _____

   _____

   _____

8. ¿Ha presentado esta queja ante alguna otra agencia federal, estatal o federal, o ante algún tribunal federal o estatal? Sí [ ] No [ ]

   Si contestó "Sí", marque el casillero correspondiente:

   Agencia federal [ ] Tribunal federal [ ] Agencia estatal [ ] Tribunal estatal [ ] Agencia local [ ]

9. Brinde por favor información acerca de una persona de contacto en la agencia/tribunal donde se presentó esta queja.

   Nombre _____

   Dirección _____

   Ciudad _____ Estado _____ Zip _____

   Teléfono _____ E-mail _____

10. Se requiere la firma abajo.

_____ _____

Firma del reclamante Fecha

Milwaukee County Transit System
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Milwaukee County Transit System
Interoffice Memorandum

TO: File

FROM: Sandra Kellner, Chief Administrative Officer

RE: Title VI Summary of Investigations, Complaints, and Lawsuits 2023-2025

DATE: April 7, 2026

For the time period from January 1, 2023 through December 31, 2025 MCTS received the following complaints and conducted subsequent investigations. All complaints, upon review, resulted in a finding of not meeting the criteria for a Title VI violation. MCTS did not receive any lawsuits in this time period.

Date of Complaint	Complainant Name	Protected Group	Resolution Summary
7/31/2024	Debra Robbins	Not indicated	Referred to Transportation Management for review. No findings of Title VI violation.
6/14/2024	Kevin Fortune	Race	No findings of Title VI violation.
8/25/2025	Michael Chambers	Not indicated	No findings of Title VI violation.
10/18/2025	Michael Chambers	Not indicated	No findings of Title VI violation.

MCTS Public Participation Plan 2026

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Glossary

ADA: The Americans with Disabilities Act prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, and transportation.

Civil Rights: Civil Rights are a class of rights and freedoms that protect individuals from unwarranted action by government and private organizations and individuals and ensure one's ability to participate in the civil and political life of the state without discrimination or repression.

Community-Based Organization (CBO): Community-Based Organizations are non-profit, neighborhood, community, ethnic, or business association groups that provide support and services to the community and businesses, through services that may include health, educational, employment training, business formation support and assistance, community building, and other social welfare services.

Community Meeting/Workshop: Community meetings are formal or informal opportunities for staff to receive public feedback in an interactive setting. They are held in a public space and open to the general public, although individuals or groups may be specifically invited. Community meeting formats include workshops, charrettes, and open houses.

Limited English Proficiency (LEP): This Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

Low-income: Households which earn less than $30,000 a year as defined by the US Census Bureau.

Marginalized Populations: Groups or communities excluded from mainstream social, economic, cultural or political life. Examples of these populations include, but are by no means limited to, groups excluded due to race, religion, political or cultural group, age, gender or financial status.

Minority or BIPOC-Black, Indigenous, and People of Color: A person who does not identify as part of the white or of European descent:

- Black or African American: a person having origins or a descendant of one of the various in any of the black racial groups of Africa
- Latino/a/x: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Latin American culture or origin, regardless of race, connected by their history of being colonized.
- Asian or Pacific Islander: a person having origins in any of the original peoples of the Far East, Southeast Asia, Indian Subcontinent, or the Pacific Islands
- American Indian or Alaskan Native: a person having origins in any of the original peoples of North America and who maintain cultural identification through tribal affiliation or community recognition.

Online Outreach: Online outreach provides a forum to both inform the public about an initiative and solicit public feedback. Online outreach includes surveys on websites or other web-based discussion platforms.

Public Participation Plan: Recipients of Federal Transit Administration (FTA) funding must submit a plan that details strategies to engage minority and limited English proficient (LEP) populations in its planning and programming activities. These efforts may be part of a broader framework that also includes outreach strategies for other traditionally underserved constituencies, such as people with disabilities and low-income populations.

Racial Equity: The condition that would be achieved if one's racial identity no longer predicted how one fares. This is part of what composes racial justice, meaning work to address root causes of inequities, not just their manifestation, must also be done. This includes elimination of policies, practices, attitudes, and cultural messages that reinforce unequal outcomes by race or fail to eliminate them.

Underrepresented: A word used to describe a group whose percentage of the population in a given group is lower than their percentage of the population in a given area. In terms of race, Hispanic/Latinx, African Americans, Native Americans, Native Hawaiian/Pacific Islanders and those of two or more races are generally to be considered included in this group.

Section 1 – Executive Summary

Purpose

MCTS exists to provide reliable, convenient, and safe public transportation services that effectively meet the varied travel needs of the community and contribute to its quality of life. We make connections daily by getting our customers to their destinations. In efforts to provide the best service to our community we take various measures to gain input and feedback from those to whom we dedicate our service.

In accordance with federal guidelines, MCTS must submit to the Federal Transit Administration (FTA) a Public Participation Plan (referred to as the "Plan") that details the company's plans and strategies to engage low-income, BIPOC, and Limited English Proficient (LEP) populations in its planning process as a recipient of federal funds and per Title VI of the Civil Rights Act of 1964 and its implementing regulations. Through the FTA, MCTS is directed to:

- Ensure that the level / quality of public transit service is provided in a nondiscriminatory manner.
- Promote full and fair participation in transit decision-making through an equity lens.
- Ensure access to transit-related programs and activities by persons with limited English proficiency.

The Plan establishes two thematic goals: Provide knowledge and information to the public.

- Effectively communicate future service changes to the public
- Gain insight and input from the public to inform planning decisions.

Objectives

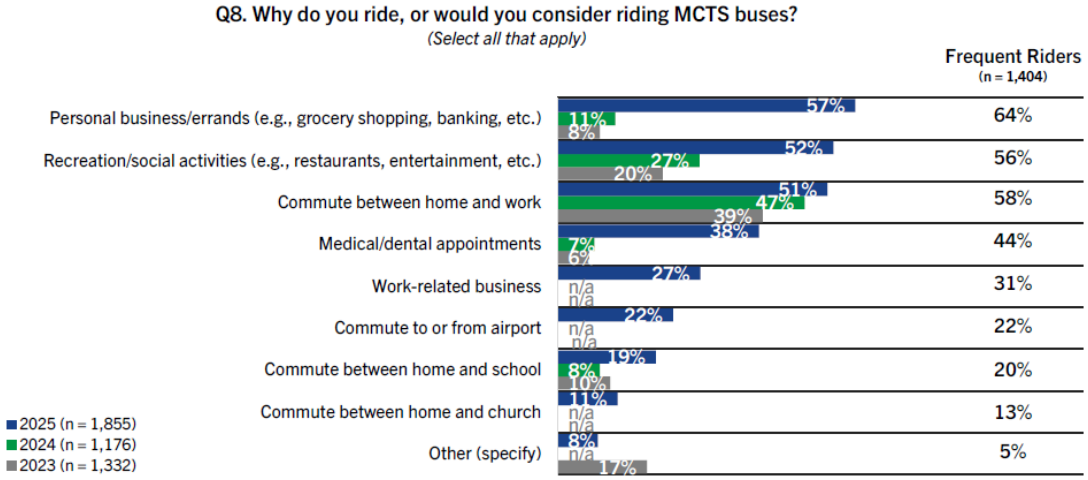
The overall objective of the Plan is to propose strategies that are aimed to improve the accessibility of MCTS to underrepresented groups but will also help to address constraints and/or barriers that may limit all persons regardless of racial background, income level, or the ability to speak English. Public participation activities will be designed to be accessible to all people. The main objectives of this plan are as follows:

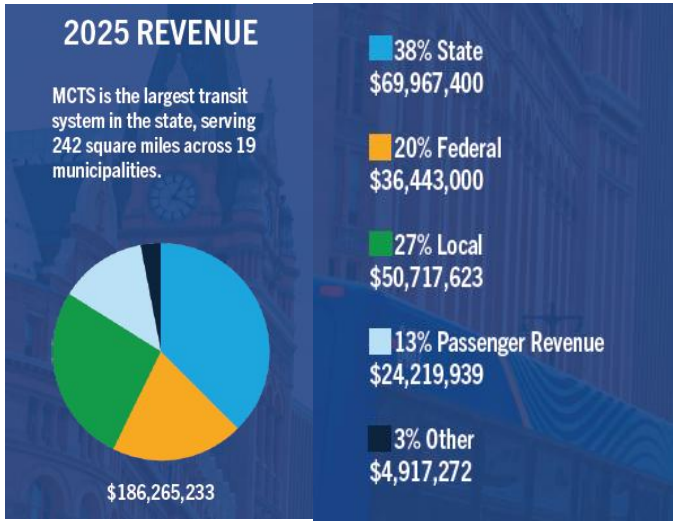
- Make information on major service changes available for the public prior to implementation
- Increase the participation of the public in major transit-related decisions.
- Obtain an understanding of transit needs, especially for underrepresented populations.

Section 2 – Overview of MCTS

History and Facts

Founded in 1975, MCTS is the 35th - largest transit system in the nation and the largest transit agency in Wisconsin. As the primary transit provider for Milwaukee County, MCTS services all 19 municipalities inside Milwaukee County. MCTS has just under 4,000 bus stops and operates approximately 49 routes, including University Bus service, Bus Rapid Transit, and High School routes. MCTS also features limited stop service which serves major destinations across the county. With programs such as U-PASS for college students and the Commuter Value Pass program for Milwaukee's workforce, MCTS is an essential contributor to the education and economic environment of Milwaukee County. MCTS provides just over 24.9 million rides a year—of those, just over 385,000 are through Paratransit, a division of the company that provides rides to people with disabilities.

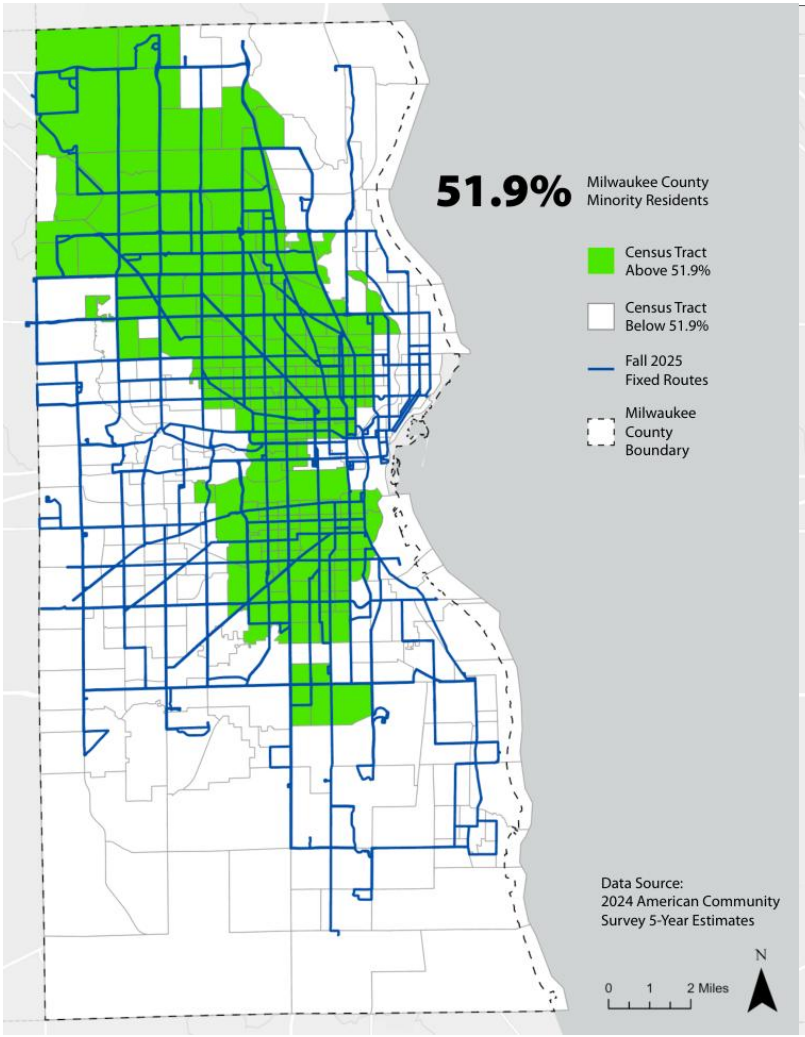


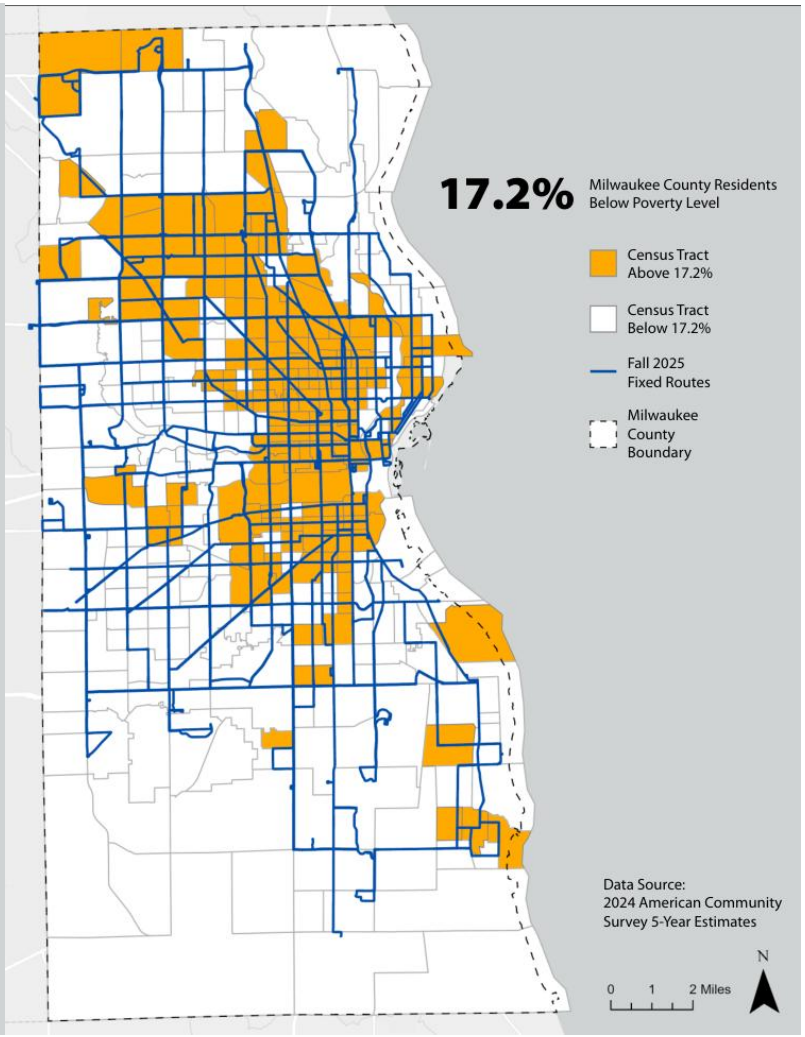


Approximately 51% of individuals use MCTS to commute to their jobs daily. With two major educational institutions located in the heart of the city, approximately 39,000 Milwaukee-area college students participate in the U-PASS program, taking advantage of discounted rates to and from college and other destinations. Designations of primary uses are shown above.

Demographics

Understanding the extent and characteristics of Title VI-protected populations within MCTS' service area provides context for a culturally sensitive, customized approach to outreach. The demographic analysis provided here will continue to assist MCTS with its outreach to Title VI populations when planning, holding, or attending events in a given geographic area or when targeting outreach towards a given ethnic community. MCTS serves a population of 926,331 (2024 ACS Community Survey 5-year estimate) Milwaukee County residents. The demographic profile of the MCTS service area is approximately 49.5% minority and 17.2% low-income (households that are below the poverty threshold). From the maps that follow, a comparison can be seen between where minorities in Milwaukee reside and where low-income populations reside.


51.9%
Milwaukee County Minority Residents
Census Tract Above 51.9%
Census Tract Below 51.9%
Fall 2025 Fixed Routes
Milwaukee County Boundary
Data Source: 2024 American Community Survey 5-Year Estimates
0 1 2 Miles
N


17.2%
Milwaukee County Residents Below Poverty Level
Census Tract Above 17.2%
Census Tract Below 17.2%
Fall 2025 Fixed Routes
Milwaukee County Boundary
Data Source: 2024 American Community Survey 5-Year Estimates
0 1 2 Miles
N

Limited English Proficient (LEP) Population

Milwaukee County is home to a diverse population, including some that speak limited English. There are 174,670 persons or 18.9% of the total population in Milwaukee County that speak a language other than English at home. The following languages are the most commonly spoken among LEP households in MCTS' service area: Spanish (64%), Other Indo-European languages (13%), Asian and Pacific Islander languages (14.5%) and other languages (8%) (2024 American Community Survey 5-year estimate).

Per Circular 4702.1B, "Title VI and the Title VI dependent Guidelines for FTA Recipients outreach to LEP populations should include meaningful strategies that help to make programs, services, and activities accessible." As a part of this latest Title VI submittal in 2026, MCTS researched and reviewed information recorded internally on previous interactions with members of the public who are LEP. The analysis included the extent to which LEP persons have encountered various departments of MCTS. Several resources were and are still being utilized to ensure that participation efforts are in compliance with continued development of the Plan.

Section 3 – Techniques for Public Engagement

MCTS will use choose from a variety of techniques as it engages with the public on matters involving transit services and policies. Specific efforts will be tailored depending on the scope of the proposed plan and the resources available for public outreach.

Public Meetings

- Public Open House – MCTS can host an open house to engage with the public when major changes to service could affect them. In addition, MCTS can host a series of open house meetings for special projects that involve several service changes occurring at one time—this can also yield needed engagement. These types of meetings would present information on the purpose for the service proposal(s) being discussed and to engage in dialogue and take comments. Staff would be available to interact with the public, answer questions and take comments on the plan.
- Community Focus – MCTS can target public meetings to different parts of its service area, providing a specific focus to potential changes happening to lines used by nearby residents. The MOVE 2025 public meetings were held in the four "quadrants" of Milwaukee County: Northeast, Southeast, Southwest, and Northwest. To ensure information provided to the public was consistent across multiple places, informational boards used matched the online survey language and were targeted to the local context.
- Public Hearing – A public hearing will be held by Milwaukee County prior to a fare increase or a major service reduction to receive comments from the public. Its purpose is to provide a forum for people to voice their opinion.
- Spanish speaking personnel can be available during public meetings for LEP populations.

- Virtual Public Meetings: In the Move 2025 service plan, virtual meetings were held to provide a convenient option for those who could not attend in-person meetings. These meetings were made available online for the public to access afterwards.

External Communications

MCTS will provide information to the public via all available communications methods (press releases, media interviews, website, app, social media, automated telephone hotline, e-newsletters, printed newsletters, flyers, posters, targeted advertisements, audio announcements, signage at bus stops, etc.) This includes notices about changes in routes and service, bus stop location changes, upcoming public meetings, and other important information about the company and community. Additionally, MCTS works with community partners and businesses to distribute transit-related information to targeted stakeholders. The Marketing Department provides a Social Media Toolkit to stakeholders to ensure riders have up-to-date information they need related to service changes. These toolkits include shareable images and captions for social media posts, as well as downloadable signage for posting inside buildings and community spaces.

MCTS generates and distributes an official press release, sends e-mail notices to all stakeholders, elected officials and our over 91,000 Rider Insider e-mail subscribers, posts on our official Facebook, X and Instagram. We have been able to work with neighborhood groups prior to these events to raise awareness, offer advice and translation/interpretation services as deemed necessary.

- MCTS will include a separate page on RideMCTS.com devoted exclusively to quarterly route and schedule changes. In addition, people that follow MCTS on X, Facebook or Instagram will be notified of upcoming plans / meetings. MCTS will make similar outreach efforts for people that belong to its Rider Insider program.

Customer Service Center

- MCTS will use its Customer Service Center as a two-way engagement tool to communicate upcoming projects and plans. Service Center staff are informed of all major projects underway, public meetings as well as impending service or fare changes to answer any questions callers may have. If a caller would like someone from MCTS staff to return their call, the Service Center will log their comment and assign it to the correct department for follow-up.

Surveys

- Since 1995, MCTS has collected customer data to better understand customers' needs and who the customers are. The annual Customer Satisfaction Survey is used to create a ridership profile which has assisted multiple departments.

Notification Efforts

- MCTS uses on-board audio and visual announcements on a case-by-case basis to announce upcoming impacts to riders. They are pre-recorded and play at a set interval between stop announcements and general messages. This system can also be used to notify riders of any service changes that may affect them while on board, as well as any associated public meetings.

Departmental Responsibilities

MCTS benefits from having a collaborative approach across departments to maximize opportunities for public outreach. This approach is used by many of our peer systems. Below are examples of how various departments currently interact with the public.

Service Development Department

- Conduct research and analysis of existing routes and identify opportunities for expanding, discontinuing, redistributing, or adding service.
- Host webinars/public meetings/public hearings to obtain public feedback on potential major service changes. Service Development will propose any changes at the beginning of the year with implementation goals for the Fall of that same year. This allows enough time for the public to provide feedback on the proposals and provides enough time to collaborate interdepartmentally as the changes are implemented.
- Enable audio announcements on buses about service changes prior to being implemented as well as public service announcements about upcoming public outreach events–in English and Spanish.
- For bus stops that will be eliminated or moved, the Planning Division generates a list of every bus stop where a temporary sign is needed and what information should be disseminated on the temporary sign.

Marketing Department

- Provide information to the public and provide notice of upcoming outreach activities using all available communications platforms and methods.
- Conducts an annual survey to identify ridership and customer satisfaction.
- Attends events in the community promoting programs and projects.
- Coordinate stakeholder community outreach programs tailored to specific stakeholders for specific feedback.

Transportation Department

- Responsible for posting notices for detours/changes at bus stops and signage.
- Assign Public Relations Operators to events, as needed.
- Bus Operators undergo customer service training and de-escalation training.

Adopt Inclusive and Proven Strategies

As the Plan is a working document and will continue to be modified, there are supplemental strategies MCTS may consider incorporating as part of the core engagement introduced in this plan. These considerations will help ensure that public participation efforts will fulfill Federal requirements, collaborate with the community, and help MCTS build closer relationships in the service area:

- Acknowledge and inform participants of how their input will be used and where to access updates.
- Maintain a database of outreach partners.
- Engage bus operators and station managers in outreach activities.

- Follow up on how their input influenced a decision.

Community Collaboration

Ambassadors at Bus Stops- MCTS MOVE 2025

In response to complete system redesign via MCTS MOVE in 2025, the agency's Transit Planners came out to bus stops to give guidance and direction to onboarding riders whose routes may have been altered or been re-routed. By having the agency's most knowledgeable members out in the community directly assisting passengers, it transcends how we imagine traditional communication to be between administrative staff and the public. This strategy is one that MCTS can look to uphold for each major service change if time and budgetary constraints allow for such outreach.

Community Clean-ups

Members of MCTS's Racial Equity Committee understood the importance of being active in the community beyond work hours and took it upon themselves to coordinate community clean-ups twice a year, one in the fall and one in the spring, to emphasize their investment in the neighborhoods that MCTS serves daily.

Section 4 – Appendix I

Milwaukee County Transit System – 2023
Public Meeting Engagement Activities by Format

Date	Event	Location & Time
1/25/2023	Paratransit Presentation	Golda Mier High School
1/30/2023	Mobile Meet-up with State Rep Jessie Rodriguez	Monday, January 30 at 2 p.m. Route 19 going Southbound/Northbound.
2/2/2023	ADA Training	MCTS
2/6/2023	Paratransit Presentation	Cudahy High School
2/7/2023	Paratransit Presentation	Milwaukee French Immersion School
2/15/2023	Paratransit Presentation	Milwaukee High School of the Arts
2/17/2023	Reduced Fare Transition Education Session	12pm-2pm @ MCTS Admin Building
2/20/2023	Reduced Fare Transition Education Session	2 p.m. to 4 p.m. @ the MCTS Admin Building
2/21/2023	Paratransit Presentation	Parkside Middle School
2/24/2023	Paratransit Presentation	South Division High School
3/2/2023	Resource Fair/Booth	Franklin Public Schools
3/9/2023	ADA Training	MCTS
3/9/2023	CONNECT 1 Bus Rapid Transit/Route Changes Community Education Session	12 p.m. to 1 p.m. @ Virtual
3/11/2023	Shamrock Club's Downtown Milwaukee Parade - St.Patrick's Day	12 p.m. to 3p.m.
3/11/2023	Bluemound Business Association Parade - St. Patrick's Day	3:30 p.m. to 5 p.m.
3/13/2023	Paratransit Presentation	Jefferson Court Apartments
3/14/2023	Paratransit Presentation	Washington High School
3/14/2023	CONNECT 1 Bus Rapid Transit/Route Changes Community Education Session	5:30 p.m. to 6:30 p.m at Milwaukee Public Library Mitchell Street Branch, 906 W Historic Mitchell St, Milwaukee, WI 53204,
3/15/2023	Paratransit Presentation	Lancaster/Townsend Schools
3/16/2023	WisGo Community Education Session	Virtual (6-7:30pm)
3/18/2023	CONNECT 1 Bus Rapid Transit/Route Changes Community Education Session	12p.m. to 1 p.m.@ MCTS Admin Building
3/22/2023	Paratransit Presentation	Lutheran Social Services
3/23/2023	Paratransit Presentation	MHS Health WI/Comm Health

Date	Event	Location & Time
3/25/2023	WisGo Fare Collection System Education Session	10:30 a.m. to 12 p.m. - Virtual
4/4/2023	MCTS @ Kinship Food Pantry re WisGo	Kinship Food Pantry (4-6pm)
4/5/2023	Paratransit Presentation	West Allis Central High School
4/6/2023	WisGo Fare Collection System Education Session	12 p.m. to 1:30 p.m.
4/10/2023	Twitter: WisGo Ask Me Anything	12pm-1pm live on MCTS Twitter
4/10/2023	Facebook: WisGo Ask Me Anything	11am-12pm live on MCTS Facebook page
4/12/2023	Paratransit Presentation	Riverside High School
4/13/2023	ADA Training	MCTS
4/14/2023	Mobile Meet-up with 12 District County Board Supervisor Juan Miguel Martinez and VIA Executive Director JoAnn Bautch	Friday, April 14th at 1 p.m. Route 18, 35 & PurpleLine. Sop #346, the southeast corner of S. 35th St and National Ave.
4/17/2023	Paratransit Presentation	Wisconsin Conservatory of Lifelong Learning
4/19/2023	Paratransit Presentation	Hamilton High School
4/20/2023	Earth Day 101 @ Alverno College	Alverno College, 3400 S 43rd St, Milwaukee, WI 53234, from 10:30am to 1:30pm
4/21/2023	Paratransit Presentation	Milwaukee High School of the Arta
4/22/2023	Reduced Fare Transition (Virtual) Education Session	10:30am-12pm - Virtual
4/22/2023	MCTS Community Clean Up Day	10am-1pm around MCTS Admin building, KK/FDL station
4/27/2023	Paratransit Presentation	Bay View High School
4/28/2023	Reduced Fare Transition Education Session	2pm-4pm @ MCTS Admin Building
5/3/2023	Paratransit Presentation	Home School Kids & Parents
5/3/2023	Community Listen & Learn: w/ County Supervisor Priscilla Coggs-Jones	Wednesday, May 3 at Northcott Nieghborhood House from 11:30 a.m. to 1:30 p.m.
5/4/2023	Paratransit Presentation	Alliance High School
5/9/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Bay View – Monday, May 9 (12pm-2pm)
5/10/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Capitol – Wednesday, May 10 (11am-1pm)
5/10/2023	Paratransit Presentation	Lutheran Social Services
5/11/2023	Paratransit Presentation	MATC
5/12/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Center Street – Friday, May 12 (2-4pm)
5/15/2023	Paratransit Presentation	Fairview School
5/15/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Central – Monday, May 15 (12pm-2pm)
5/16/2023	Resource Fair/Booth	Clinton Rose Senior Center
5/16/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	East – Tuesday, May 16 (4-6pm)

Date	Event	Location & Time
5/17/2023	Paratransit Presentation	Bay View High School
5/17/2023	WisGo Presentation	Ebenezer Church/Food Pantry from 2pm-4pm
5/18/2023	ADA Training	MCTS
5/18/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Good Hope -Thursday, May 18 (12pm-2pm)
5/19/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Atkinson – Thursday, May 19 (11am-1pm)
5/20/2023	BRT Open House/WC Securement	MCTS
5/22/2023	BRT Open House/WC Securement	MCTS
5/22/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Mitchell Street – Monday, May 22 (3pm-5pm)
5/22/2023	WisGo Community Session at Wilson Commons	11 a.m. at Wilson Commons
5/24/2023	Paratransit Presentation	Juniper/Canticle Court
5/25/2023	BRT Open House/WC Securement	MCTS
5/25/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Tippecanoe – Thursday, May 25 (3-5pm)
5/26/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Villard Square – Friday, May 26 (2-4pm)
5/30/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Zablocki Tuesday, May 30 (3:30pm-5:30pm)
5/31/2023	WisGo/CONNECT "Ask me anything" Library Pop-up	Washington Park – Wednesday, May 31 (12pm-2pm)
6/4/2023	2023 Pride Parade	2 p.m. at 2nd Street and Greenfield Ave travels north on 2nd Street to Seeboth Street.
6/8/2023	Paratransit Presentation	St. John's on the Lake
6/14/2023	McGovern Night Out hosted by Supervisor Sequanna Taylor	McGovern Park (5-7pm)
6/14/2023	2023 MKE Night Market	West Wisconsin Avenue between 2nd Street & Vel R. Phillips Avenue. 5 p.m. to 10 p.m.
6/19/2023	Juneteenth Day Parade & Celebration	Juneteenth Parade and Festival - 7 a.m. to 5 p.m.(14th & Atkinson Ave. and ends at Dr. MLK Jr. Drive & Locust St.)
6/29/2023	ADA Training	MCTS
7/1/2023	Mobile Meet-up with the MCTS Transit Teen Advisory Board	9am to 11am. Starting point was at the start of CONNECT BRT (Jackson St and Wisconsin Ave Eastbound)
7/4/2023	Wauwatosa 4th of July Parade	Parade lineup is at Hoyt Pool parking lot at 9:00 am. The parade will then proceed north on Swan (92nd Street) to North Avenue, then turn right on North Avenue, ending near 80th Street.
7/6/2023	Resource Fair/Booth	SeniorFest
7/8/2023	WNOV Community Resource Fair	10 a.m. to 1 p.m. at the Clinton & Bernice Rose Senior Center.
7/10/2023	WisGo/CONNECT virtual community session	Virtual - 12pm-1pm
7/13/2023	Paratransit Presentation	MPS Transition Program

Date	Event	Location & Time
7/18/2023	Paratransit Presentation	Lutheran Social Services
7/19/2023	Paratransit Presentation	Bay View Montessori
7/19/2023	2023 Milwaukee Night Market	West Wisconsin Avenue between 2nd Street & Vel R. Phillips Avenue. 5 p.m. to 10 p.m.
7/20/2023	Paratransit Presentation	South Milwaukee Schools
7/26/2023	Resource Fair/Booth	Clinton Rose/ADA Celebration
7/26/2023	Paratransit Presentation	Juntiper/Canticle Court
8/2/2023	WisGo/CONNECT community session at West Allis Senior Center	West Allis Senior Center 1:30 p.m. to 2:30 p.m.
8/3/2023	National Night Out event at KK Sports Center	5-8pm
8/3/2023	ADA Training	MCTS
8/15/2023	CEX Budget Town Hall/ Job and Resource Fair	Washington Park Senior Center
8/15/2023	WisGo/CONNECT virtual community session	Virtual - 5-6pm
8/16/2023	2023 Milwaukee Night Market	West Wisconsin Avenue between 2nd Street & Vel R. Phillips Avenue. 5 p.m. to 10 p.m.
8/21/2023	CEX Budget Town Hall/ Job and Resource Fair	Kosciusko Community Center
8/23/2023	Paratransit Presentation	McGovern Park Senior Center
8/23/2023	CEX Budget Town Hall/ Job and Resource Fair	Brown Deer Clubhouse
8/24/2023	CEX Budget Town Hall/ Job and Resource Fair	Franklin Saber Center for the Performing Arts
8/25/2023	Paratransit Presentation	Bay View High School
9/6/2023	Paratransit Presentation	Hamilton High School
9/8/2023	ADA Training	MCTS
9/12/2023	Paratransit Presentation	Adult Day Services of SE WI
9/13/2023	Paratransit Presentation	Pulaski High School
9/13/2023	2023 Milwaukee Night Market	West Wisconsin Avenue between 2nd Street & Vel R. Phillips Avenue. 5 p.m. to 10 p.m.
9/14/2023	WisGo/CONNECT virtual community session	Virtual - 2pm-3pm
9/15/2023	Paratransit Presentation	Riverside High School
9/18/2023	Paratransit Presentation	WCLL
9/21/2023	Paratransit Presentation	Juniper/Canticle Court
9/22/2023	Paratransit Presentation	South Division High School
9/25/2023	Paratransit Presentation	Golda Meir School
9/27/2023	Paratransit Presentation	McDowell Montessori School

Date	Event	Location & Time
10/4/2023	Big Truck Story Time with MCTS & Milwaukee Public Library	Tippecanoe Branch Library
10/4/2023	Paratransit Presentation	Jefferson Court Apartments
10/4/2023	Big Truck Story Time	Tippecanoe Library
10/10/2023	Resource Fair/Booth	WAWM Accesibility Fair
10/12/2023	ADA Training	MCTS
10/13/2023	Paratransit Presentation	Whte Cane Safety-Gaenslen
10/16/2023	Paratransit Presentation	Community Transition Services
10/17/2023	Paratransit Presentation	Mount Mary University
10/19/2023	Resource Fair/Booth	Homeless Connect
10/19/2023	Project Homless Connect	Marquette Alumni Union
10/28/2023	Sherman Park Harvest Fest	Sherman Park
10/30/2023	Paratransit Presentation	Milwaukee Excellence Charter
11/1/2023	Paratransit Presentation	Lapham
11/2/2023	Paratransit Presentation	Lutheran Social Services
11/3/2023	Paratransit Presentation	Lancaster School
11/3/2023	Mobility Device Securement	Kelly Senior Center
11/8/2023	Paratransit Presentation	South Division High School - 9am
11/8/2023	Paratransit Presentation	South Division High School - 1:30pm
11/13/2023	Paratransit Presentation	Project Search
11/14/2023	Paratransit Presentation	Washington High School
11/15/2023	Stuff the Bus (Media Event)	6462 S 27th Street, Oak Creek, WI 53154
11/16/2023	ADA Training	MCTS
11/17/2023	Paratransit Presentation	Milwaukee School of Languages
11/20/2023	Paratransit Presentation	LEAPP It's My Life
11/22/2023	Stuff the Bus	6462 S 27th Street, Oak Creek, WI 53154
11/30/2023	Paratransit Presentation	Morse Middle School
12/21/2023	ADA Training	MCTS

Milwaukee County Transit System - 2024
Public Outreach and Involvement Activities

Date	Event	Location & Time
1/8/2024	Paratransit Presentation	Milwaukee Parkside School
1/15/2024	MLK Day Birthday Celebration	Monday, January 15 at 8am-12pm @ the Marcus Center
1/17/2024	Paratransit Presentation	Cherry Court Senior Living
1/25/2024	Paratransit Presentation	Lutheran Social Services
January	Rosa Parks Tribute Scholarship Announcement and Celebration for Milwaukee County High School Students	
2/13/2024	Paratransit Presentation	Wauwatosa East High School
2/21/2024	Resource Fair/Booth	Wauwatosa Inclusion Resource Fair
2/22/2024	ADA Training	MCTS
2/27/2024	North-South BRT Community Feedback Open House	4pm-7pm @ Wilson Senior Center
2/28/2024	Virtual North-South BRT Community Meeting	12pm-1pm @ Virtual
2/29/2024	North-South BRT Community Feedback Open House	3pm-6pm @ City Century Tower
2/29/2024	Paratransit Presentation	South Division High School
March	March Center Annual César E. Chávez Celebration (MCTS sponsors art one 1 shelter for art contest winners)	
3/7/2024	Paratransit Presentation	Riverside High School
3/8/2024	Paratransit Presentation	Bay View High School
3/9/2024	Downtown and Bluemound Business Association Parade - St. Patrick's Day	3:30 p.m. to 5 p.m.
3/14/2024	CONNECT 1 Pre-Pay Virtual Public Meeting	12:30pm-1:30pm
3/19/2024	CONNECT 1 Pre-Pay Virtual Public Meeting	3pm-4pm @ virtual
3/20/2024	Paratransit Presentation	WCS CORE
3/21/2024	Paratransit Presentation	Project Search
3/21/2024	Paratransit Presentation	Department of Vocational Rehabilitation
3/27/2024	CONNECT 1 Pre-Pay Public Meeting	4pm-5pm
4/4/2024	Paratransit Presentation	Pulaski High School
4/5/2024	Paratransit Presentation	Obama High School
4/8/2024	Paratransit Presentation	Goodwill
4/10/2024	Transportation in our Neighborhoods - Community Meeting	5:30pm-6:30pm

Date	Event	Location & Time
4/11/2024	ADA Training	MCTS
4/18/2024	Paratransit Presentation	Ronald Reagan High School
4/19/2024	Earth Day @ Alverno College	Alverno College, 3400 S 43rd St, Milwaukee, WI 53234, from 10:30am to 1:30pm
4/23/2024	Paratransit Presentation	Milwaukee School of Languages
4/24/2024	Paratransit Presentation	Hamilton High School
4/24/2024	Resource Fair/Booth	Franklin High School
5/1/2024	Paratransit Presentation	Project Search
5/1/2024	Paratransit Presentation	James Madison High School
5/3/2024	Paratransit Presentation	Fairview School
5/3/2024	Paratransit Presentation	Fairview School
5/7/2024	Paratransit Presentation	Oak Creek High School
5/8/2024	Paratransit Presentation	West Allis Central High School
5/9/2024	Paratransit Presentation	MATC
5/10/2024	Paratransit Presentation	Milwaukee Excellence School
5/14/2024	Paratransit Presentation	Adult Say Services SE WI
5/14/2024	2024 MobiliSE Summit: Why Transit Matters	
5/16/2024	ADA Training	MCTS
5/18/2024	Big Truck Day	11am-2pm @ Red Arrow Park
5/23/2024	Paratransit Presentation	Lutheran Social Services
5/24/2024	Senator Tim Carpenter Senior Resource Information Fair	
6/4/2024	2024 Pride Parade	2 p.m. at 2nd Street and Greenfield Ave travels north on 2nd Street to Seeboth Street.
6/4/2024	Paratransit Presentation	Jefferson Court Apartments
6/11/2024	Supervisor Coggs-Jones and Alderwoman Coggs - Joint Housing and Transportation Listen & Learn Session	11:30am-1:30pm @ Northcott Neighborhood House
6/12/2024	8th Annual McGovern Night Out at McGovern Park	4pm-7PM @ McGovern Park
6/19/2024	Juneteenth Day Parade & Celebration	Juneteenth Parade and Festival - 7 a.m. to 5 p.m.(14th & Atkinson Ave. and ends at Dr. MLK Jr. Drive & Locust St.)
6/28/2024	Resource Fair/Booth	McGovern Park Senior Center
7/5/2024	Resource Fair/Booth	Seniorfest @ Summerfest
7/8/2024	WNOV Community Resource Fair	10 a.m. to 1 p.m. at the Clinton & Bernice Rose Senior Center.

Date	Event	Location & Time
7/9/2024	Paratransit Presentation	West Allis Senior Center
7/11/2024	Paratransit Presentation	Living Hope Lutheran School
7/23/2024	Paratransit Presentation	Curative 92nd St
7/24/2024	Washington Park Wednesdays	5-7pm Washington Park Bandshell at 4599 W. Lloyd St.
7/25/2024	Paratransit Presentation	Goodwill
7/25/2024	MCTS MOVE 2025 - Virtual Stakeholder Meeting w/ City of Milwaukee	Virtual
7/26/2024	Resource Fair/Booth	ADA 34 Celebration
7/29/2024	Paratransit Presentation	Clinton Rose Senior Center
7/30/2024	Paratransit Presentation	Curative Forest Home
7/31/2024	Washington Park Wednesdays	5-7pm Washington Park Bandshell at 4599 W. Lloyd St.
8/1/2024	ADA Training	MCTS
8/3/2024	MCTS @ Caribbean & Latin American Festival	11am-3pm @ South 4th Street & West National Avenue, S 4th St & W National Ave, Milwaukee, WI
8/6/2024	National Night Out	3 p.m. - 7 p.m. at 3000 N. Sherman Blvd
8/6/2024	Paratransit Presentation	Kelly Senior Center
8/7/2024	Paratransit Presentation	Curative FDL
8/16/2024	Paratransit Presentation	McGovern Park Senior Center
8/16/2024	Paratransit Presentation	Friends of South Milwaukee Library
8/22/2024	Paratransit Presentation	Lutheran Social Services
8/17/2024	MCTS @ Hmong American Friendship Association's 17th Annual Back to School & Health Fair	Saturday, August 17th from 10am-1pm @ 824 W Vliet St, Milwaukee, WI 53208
8/20/2024	MCTS @ Downtown Employee Appreciation Week “World’s Largest Coffee Break” event (Connect BRT Outreach)	
8/22/2024	Paratransit Presentation	Lutheran Social Services
8/24/2024	Mexican Fiesta	Location: Henry W. Maier Festival Park (Summerfest Grounds), 200 N. Harbor Dr., Milwaukee, WI.
9/5/2024	Paratransit Presentation	South Division High School
9/7/2024	MCTS @ Silver City Festival from 12pm-5pm	National Avenue between 32nd and 35th Street
9/9/2024	Paratransit Presentation	Project Search Children's Hospital
9/19/2024	ADA Training	MCTS
9/20/2024	Paratransit Presentation	Bay View High School

Date	Event	Location & Time
9/24/2024	Paratransit Presentation	Hanan Refugees Relief Group
9/28/2024	Doors Open MKE	From 10am-3pm
10/1/2024	Paratransit Presentation	West Allis Central High School
10/3/2024	Paratransit Presentation	WCS OARS
10/10/2024	Paratransit Presentation	Vincent High School
10/15/2024	Paratransit Presentation	Vision Forward White Cane Safety
10/15/2024	Paratransit Presentation	Mount Mary University
10/15/2024	Resource Fair/Booth	WAWM RCS Dis Fair
10/16/2024	Paratransit Presentation	Wisconsin Conservatory of Lifelong Learning
10/17/2024	Paratransit Presentation	Hamilton High School
10/17/2024	Resource Fair/Booth	Project Homeless Connect
10/22/2024	Paratransit Presentation	Alliance/Roosevelt Schools
10/23/2024	Paratransit Presentation	Brown Deer Middle/High School
10/24/2024	Paratransit Presentation	Lutheran Social Services
10/26/2024	Sherman Park Harvest Fest	2pm-6pm at Sherman Park
10/28/2024	Paratransit Presentation	Howard Fuller Collegiate Academy
10/30/2024	Paratransit Presentation	International Learning Program
11/12/2024	Paratransit Presentation	WAWM Community Transition Services
11/12/2024	Paratransit Presentation	Pulaski High School
11/14/2024	MCTS MOVE 2025 - Virtual Stakeholder Meeting w/ Village of Shorewood	Virtual
11/19/2024	MCTS MOVE 2025 - Virtual Stakeholder Meeting w/ City of South Milwaukee	Virtual
11/20/2024	MCTS MOVE 2025 - Virtual Stakeholder Meeting w/ City of West Allis	Virtual
11/21/2024	MCTS MOVE 2025 - Virtual Stakeholder Meeting w/ City of Oak Creek	Virtual
11/21/2024	Stuff the Bus	3 Pick n Save locations
11/6/2024	Stuff the Bus (Media Event)	
12/6/2024	Paratransit Presentation	Children's Hospital Project Search
12/10/2024	Paratransit Presentation	Lapham Park
12/10/2024	Paratransit Presentation	Alexian Village
12/11/2024	Paratransit Presentation	Hanan Refugees Relief Group

Date	Event	Location & Time
12/12/2024	Paratransit Presentation	Lutheran Social Services
12/12/2024	Paratransit Presentation	Lutheran Social Services
12/19/2024	ADA Training	MCTS

Milwaukee County Transit System - 2025

Public Outreach and Involvement Activities

Date	Event
January	Rosa Parks Tribute Scholarship for Milwaukee County High School Students
1/8/2025	Paratransit presentation at Nathan Hale High School
1/14/2025	MOVE 2025 MCTS Community Meeting @ Milwaukee Public Library East Branch
1/16/2025	Paratransit presentation at Wauwatosa East High School
1/16/2025	MOVE 2025 MCTS Community Meeting @ Oak Creek City Hall
1/22/2025	MOVE 2025 MCTS Community Meeting @ Silver Spring Neighborhood Center
1/25/2025	MOVE 2025 MCTS Community Meeting @ West Milwaukee Community Center
2/4/2025	MOVE 2025 MCTS Community Meeting @ MCTS Admin Building
2/6/2025	ADA Training at MCTS
2/10/2025	Paratransit presentation at College Court Senior Apartments
2/13/2025	Paratransit presentation at St. Rita Square Apartments
2/20/2025	Paratransit presentation at Carmen High School
2/21/2025	Paratransit presentation at Convent Hill Senior Apartments
2/27/2025	Paratransit presentation at Lutheran Social Services
March	57th Shamrock Club of Wisconsin Saint Patrick's Day Parade in cooperation with the Westown Association + Bluemound St. Patrick's Day Parade
3/6/2025	Paratransit presentation at Hanan Refugees Relief Group
3/11/2025	Resource Fair at Franklin High School
3/12/2025	Paratransit presentation at MATC South Campus
3/13/2025	Paratransit presentation at Hamilton High School
3/14/2025	Paratransit presentation at Alexian Village Senior Campus
3/18/2025	Paratransit presentation at Project Search
3/28/2025	ADA Training at MCTS
4/3/2025	Paratransit presentation at Garland School

Date	Event
4/7/2025	Paratransit presentation at Bradley Tech High School
4/8/2025	MOVE 2025: Phase 2 Public Input
4/10/2025	Paratransit presentation at Wis Cons of LifeLong Learning
4/10/2025	MOVE 2025: Phase 2 Public Input
4/11/2025	MOVE 2025: Stakeholder Meeting with UW-Milwaukee Transportation Staff
4/14/2025	Paratransit presentation at St. John's Senior Living
4/14/2025	MOVE 2025: Stakeholder Meeting with St. John's on the Lake
4/16/2025	Paratransit presentation at Lincoln Ave School
4/17/2025	Paratransit presentation at South Milwaukee High School
4/22/2025	Paratransit presentation at Morse Middle School
4/23/2025	Paratransit presentation at Froedtert Project Search
4/24/2025	MCTS @ Milwaukee County's 2025 Take a Child to Work Day
4/25/2025	Paratransit presentation at St. Rita Square Senior Living
4/29/2025	Paratransit presentation at Milwaukee School of Languages
5/5/2025	Paratransit presentation at South Division High School
5/7/2025	Paratransit presentation at Wauwatosa West High School
5/8/2025	Paratransit presentation at MATC
5/8/2025	MCTS @ Wraparound Milwaukee - National Children's Mental Health Day
5/9/2025	Paratransit presentation at Washington High School
5/13/2025	Paratransit presentation at South Division High School
5/14/2025	Paratransit presentation at Bay View High School
5/15/2025	ADA Training at MCTS
5/17/2025	Big Truck Day
5/19/2025	Paratransit presentation at Fairview School - 8am
5/19/2025	Paratransit presentation at Fairview School - 9am
5/19/2025	Paratransit presentation at Fairview School - 10am
5/20/2025	Paratransit presentation at Nathan Hale High School
5/21/2025	Paratransit presentation at Obama High School
5/22/2025	Paratransit presentation at Salvation Army
5/23/2025	Senator Tim Carpenter Senior Resource Information Fair
5/28/2025	Paratransit presentation at Audubon High School
5/29/2025	Paratransit presentation at McDowell Montessori School

Date	Event
5/30/2025	Paratransit presentation at James Madison High School
6/3/2025	Paratransit presentation at Carmen School - Northwest
6/4/2025	Paratransit presentation at Jefferson Court Senior Apts
6/5/2025	Paratransit presentation at Adult Day Services of SE Wisconsin
6/6/2025	Paratransit presentation at Escuela Verde School
6/6/2025	Paratransit presentation at Escuela Verde School
6/8/2025	2025 Pride Parade
6/9/2025	Paratransit presentation at James Madison Academy
6/11/2025	Paratransit presentation at 91st St Goodwill
6/12/2025	Paratransit presentation at WAWM Senior Day Program
6/17/2025	Paratransit presentation at Ascension All Saints Health Center
6/19/2025	Juneteenth Parade and Festival
6/20/2025	McGovern Night Out
6/27/2025	ADA Training at MCTS
6/27/2025	43rd+Vliet: Life is a Runway Night Market (Video and Event Collab + MCTS Merch Promo/fashion show)
7/9/2025	Paratransit presentation at Division of Vocational Rehabilitation
7/15/2025	Paratransit presentation at Clinton Rose Senior Center
7/16/2025	Washington Park Wednesdays (5-8pm @ Washington Park)
7/17/2025	Paratransit presentation at Division of Vocational Rehabilitation
7/25/2025	Paratransit presentation at McGovern Park Senior Center
7/26/2025	Resource Fair/Booth at Riverwest 24 Bike Event
7/29/2025	Paratransit presentation at Howard Fuller Collegiate Academy
7/29/2025	Paratransit presentation at Howard Fuller Collegiate Academy
7/29/2025	Paratransit presentation at Howard Fuller Collegiate Academy
8/13/2025	Paratransit presentation at Howard Fuller Collegiate Academy
8/14/2025	Paratransit presentation at Living Hope Lutheran School
8/21/2025	ADA Sensitivity Training at MCTS
8/22/2025	Mexican Fiesta
8/22/2025	Paratransit presentation at South Milwaukee Public Library
8/23/2025	Mexican Fiesta
8/24/2025	Mexican Fiesta
8/29/2025	Paratransit presentation at International Institute

Date	Event
9/6/2025	VIA CDC Silver City Festival
9/8/2025	Paratransit presentation at Project Search
9/9/2025	Paratransit presentation at Norris School
9/21/2025	Puerto Rican Festival
9/23/2025	Paratransit presentation at Alverno College
9/26/2025	Paratransit presentation at Adult Day Services - Curtis Center
9/29/2025	Paratransit presentation at Wauwatosa Library w/ MKE Bike Fed
10/9/2025	ADA Training at MCTS
10/10/2025	Paratransit presentation at Wauwatosa West High School
10/14/2025	Resource Fair/Booth at WAWM Adaptive Rec Center
10/14/2025	2026 Budget Town Hall with Supervisor Logsdon
10/14/2025	2026 Budget Town Hall with Supervisors Martinez, Gomez-Tom, Wasserman, Eckblad, and Bielinski
10/16/2025	Resource Fair/Booth at Direct Supply Senior Res Fair
10/20/2025	2026 Budget Town Hall with Supervisor Wasserman
10/20/2025	2026 Budget Town Hall with Supervisors Johnson, Jr, S. Taylor, and Martin
10/20/2025	2026 Budget Town Hall with Supervisor Vincent
10/21/2025	Paratransit presentation at Mount Mary University
10/21/2025	2026 Budget Town Hall with Supervisor Coggs-Jones
11/21/2026	Annual Stuff the Bus Event (11am-6pm)
10/25/2026	2026 Budget Town Hall with Chairwoman Nicholson
10/25/2025	Sherman Park Harvest Fest for Chariwoman Nicolson's District
10/27/2025	2026 Budget - County Board Public Hearing
10/28/2025	2026 Budget Town Hall with Supervisors Martinez and Gomez-Tom
10/29/2025	Paratransit presentation at West Allis Central High School
10/30/2025	2026 Budget Town Hall with Supervisors Martinez and Gomez-Tom
10/31/2025	Paratransit presentation at Bay View High School
11/3/2025	Paratransit presentation at OASIS-MPS
11/4/2025	Paratransit presentation at OASIS-MPS
11/11/2025	Paratransit presentation at Burmese Rohinga Community
11/12/2025	Paratransit presentation at WAWM Community Transition Services
11/13/2025	Paratransit presentation at United Community Senior Center
11/13/2025	Resource Fair/Booth at Whitefish Bay Library w/ MKE Bike Fed

Date	Event
11/18/2025	Paratransit presentation at Milwaukee High School of the Arts
11/20/2025	ADA Training at MCTS
12/2/2025	Paratransit presentation at Project Search
12/3/2025	Paratransit presentation at Project Search
12/9/2025	Resource Fair/Booth at UCC Senior Center
12/13/2025	Paratransit presentation at South Division High School
12/19/2025	Paratransit presentation at Riverside University High School

2026

Milwaukee County Transit System Limited English Proficiency Plan



Sneha Arunkumar

MCTS

4/1/2026

Milwaukee County Transit System

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2026 Limited English Proficiency Plan

I. Introduction

Per FTA Circular 4702.1B, "Title VI and Title VI-Dependent Guidelines for FTA Recipients", the Federal Transit Administration (FTA) requires that recipients and sub-recipients of federal funding take responsible steps to ensure that persons with limited English proficiency (LEP) are afforded meaningful access to services, programs, and activities.

This document provides details of an extensive effort undertaken by the Milwaukee County Transit System for ensuring meaningful access to public transportation for those individuals who have limited English-speaking skills. It includes a language assistance plan to guide implementation efforts for the LEP population.

II. Relevant Guidance

Throughout the preparation of this plan, several resources were referenced in order to ensure compliance and development of a comprehensive plan. Some of the resources utilized are listed below.

https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/about-limited-english-proficiency-lep
U.S. Department of Transportation Civil Rights, Limited English Proficiency

https://www.federalregister.gov/documents/2005/12/14/05-23972/policy-guidance-concerning-recipients-responsibilities-to-limited-english-proficient-lep-persons
Federal Register, U.S. Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons

https://portal.ct.gov/DPH/Workforce--Professional-Development/Office-of-Health-Equity/I-SPEAK-Cards
Printable version of US Census "I Speak Cards"

https://dwd.wisconsin.gov/wioa/doc/Civil_Rights_Compliance_Guide.docx
Civil Rights Guide

III. LEP Needs Assessment: Four-Factor Analysis

The Title VI Plan submitted in 2020 contained a plan for conducting the four-factor analysis to assist in understanding and addressing the needs of the LEP population. This comprehensive analysis was initiated in 2009 and updated to its present form in 2026. The following information outlines the progress of that analysis and presents the findings that resulted:

A. FACTOR 1: The number or proportion of LEP persons eligible to be served likely to be served by the program or recipient.

a) How LEP persons interact with the recipient's agency

MCTS researched and reviewed information kept by MCTS on past interactions with members of the public who are LEP. This included an analysis to determine the extent to which LEP persons have come into contact with the various departments of MCTS.

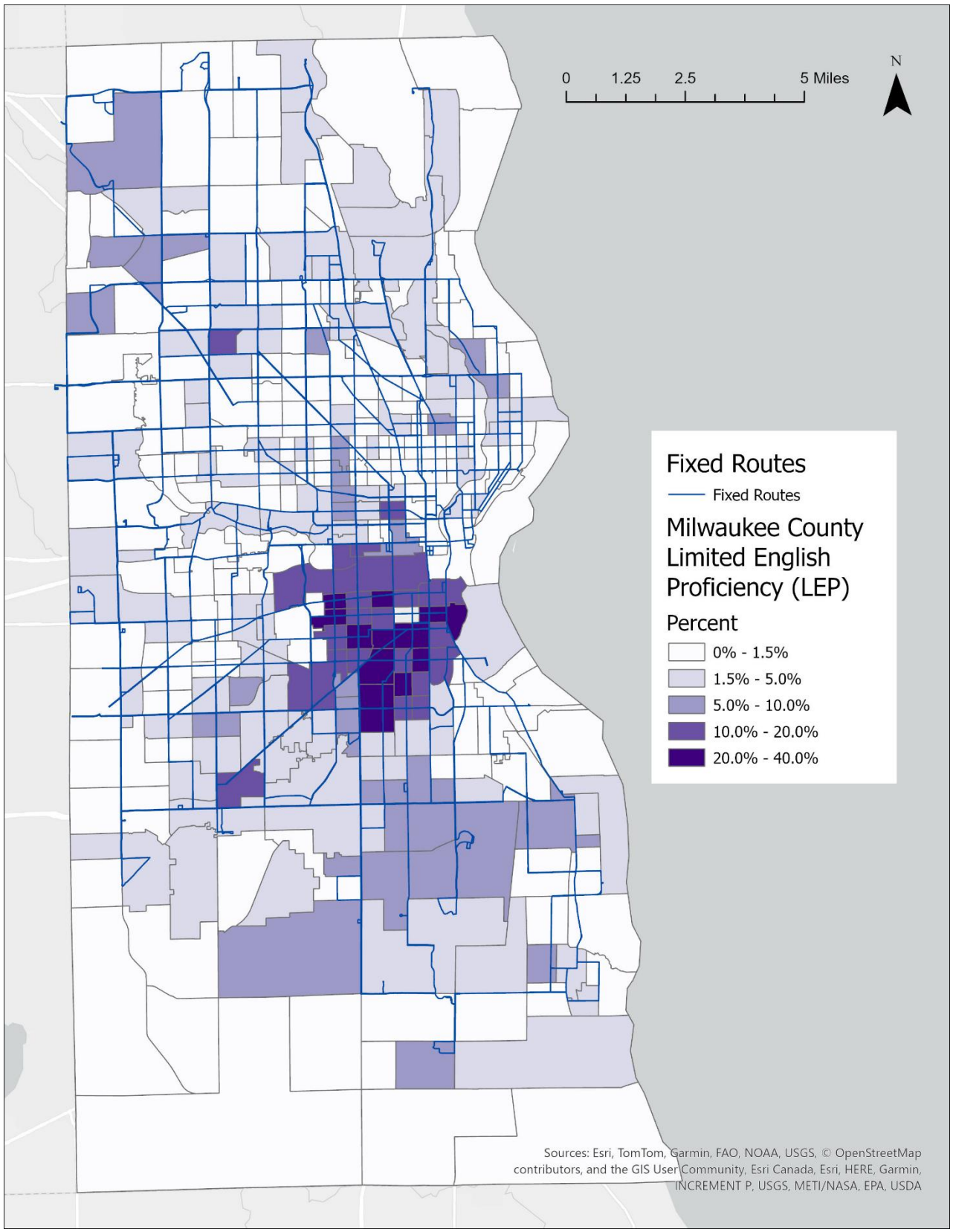
Results: *The analysis of past contact examined several areas of customer contact including Customer Service phone line and reception, Paratransit Office, and Dispatch. All areas reported Spanish as the primary language used by LEP customers. Below is a graph of our Foreign Language Interpretation Service Usage reporting from Certified Languages International (January 1st, 2023, through December 31st, 2025).*

Language	Number of Calls	Minutes	Average Call Length (min)
Spanish	237	2514	10.61
Karen	2	55	27.50
Rohingya	3	52	17.33
Malay	1	41	41.00
Amharic	1	27	27.00
Burmese	2	23	11.50
Swahili	3	23	7.67
Russian	2	15	7.50
Arabic	1	12	12.00
Hmong	1	3	3.00
TOTAL	***253***	***2765***	***10.93***

b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language

***Results**: In MCTS's service area (Milwaukee County), 3.8% of households are Limited-English Speaking. Of those LEP households, Spanish is the dominant LEP language (57.7% of LEP households). The table on page 6 shows a breakdown of LEP households by language in Milwaukee County.*

Below is a map that identifies percentage of LEP households for census tracts in the MCTS Service Area (Milwaukee County). The map was generated with ESRI's ArcMap using a 5-year estimate from the American Community Survey from 2024. MCTS' Planning Department also frequently uses Remix Transit Planning software to effectively analyze transit service provision to all population groups as it displays various Census Data layers, ridership data and other pertinent information underneath the system's route traces. The software also allows Planners the ability to draw new routes or extensions and it instantly calculates the costs and relevant schedule data of the new service. The use of Remix in our Public Participation efforts to LEP populations has enhanced our ability to effectively communicate service change information and provides the opportunity for MCTS to efficiently cost-out any service changes within these communities.


0
1.25
2.5
5 Miles
N
Fixed Routes
Fixed Routes
Milwaukee County Limited English Proficiency (LEP)
Percent
0% - 1.5%
1.5% - 5.0%
5.0% - 10.0%
10.0% - 20.0%
20.0% - 40.0%
Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri Canada, Esri, HERE, Garmin, INCREMENT P, USGS, METI/NASA, EPA, USDA

Languages Spoken at Home and Ability to Speak English in Milwaukee County, WI
2024 American Community Survey – 1-Year Estimate – Table B16002

Household Language	Households	% of Total Households	% of Total Limited English-Speaking Households
Total Households	392,399	100.00%	-
English only	321,129	81.84%	-
Speak a language other than English	71,270	18.16%	-
Limited English-Speaking Households	15,408	3.43%	100.00%
Spanish	42,655	10.90%	64.42%
French, Haitian, or Cajun	1,796	0.46%	1.92%
German or other West Germanic languages	2,553	0.65%	2.20%
Russian, Polish, or other Slavic languages	3,074	0.78%	6.29%
Other Indo-European languages	5,702	1.45%	6.00%
Korean	501	0.13%	0.87%
Chinese (incl. Mandarin, Cantonese)	1,528	0.39%	2.53%
Vietnamese	621	0.16%	1.31%
Tagalog (incl. Filipino)	857	0.22%	0.77%
Other Asian and Pacific Island languages (incl. Hmong)	6,968	1.78%	9.70%
Arabic	2,279	0.58%	1.97%
Other and unspecified languages	2,736	0.70%	2.02%

c): The literacy skills of LEP population in their native languages, in order to determine whether translation of documents will be an effective practice

Spanish is the dominant LEP language in Milwaukee County. Various MCTS signs and forms exist both on the MCTS website and on MCTS buses. More details are provided in Factor 3, Part A.

d) Whether LEP persons are underserved by the recipient due to language barriers

Bilingual employees in the Planning Department gave presentations and/or were available to answer questions at Service Change Public Meetings, specifically at MOVE 2025 public engagements.

B. FACTOR 2: The frequency with which LEP persons come into contact with the program.

a) MCTS Employee Interactions

MCTS conducted informal e-mail interviews with members from each department that comes in contact with LEP persons. Here is what we learned:

PARATRANSIT: *Since 2017, both the Transit Plus and Reduced Fare applications have been made available in Spanish and are located on the MCTS website to download and print. Also, Paratransit works with ABLE (Audio & Braille Literacy Enhancement) to create documents in Braille or large print upon request. The Transit Plus Riders Guide is also available in audio format on the website.*

PARATRANSIT (Mobility Management Team): *Paratransit (Mobile Mobility Management Team) holds Travel Training sessions at the International Institute of Wisconsin (IIW) and Lutheran Social Services (LSS) to teach newly arrived refugees how to ride the bus. MCTS is currently working with IIW to develop ADA Sensitivity Training written materials for Driver Training Sessions.*

The Mobility Management Team has a Spanish version of their Freedom on Wheels PowerPoint presentation available upon request.

Transit Plus eligibility assessors and clerks utilize the Certified Languages International translation service on their phones for assessment related tasks.

Additionally, the Mobility Management team has conducted community outreach at the following locations:

- *United Community Center (UCC)*
- *International Learning Center (ILC)*
- *A.L.A.S. (Alianza Latina Aplicando Soluciones) Resource Center*
- *Refugee Health Services*
- *Escuela Verde High School*
- *High Schools: Washington High School ESL, Milwaukee School of Languages, and South Division High School (more than half the student population are Spanish speaking), Escuela Verde High School*

- *Hosted an Information Booth at World Refugee Day*

DISPATCH: *When an operator needs to interact with a Spanish-speaking LEP person, they call Dispatch for assistance. Personnel will use a translation app to best meet the needs of riders. No other accommodation is available at this time.*

HUMAN RESOURCES: *Job applications are not offered in any other language as applicants are advised they must be able to read, write and speak fluent English.*

CUSTOMER SERVICE & RECEPTION AREA: *Milwaukee County Transit System's Customer Service Department has the ability to assist callers with limited English language proficiency by working with the Certified Languages International. This company has access to telephonic interpreters of over 200 languages, free of charge to MCTS customers, at the MCTS Administration building and both Fond du Lac and Kinnickinnic Stations. Between 2023 and 2025 MCTS assisted 253 LEP persons through the customer phone line, and at reception.*

Most often, a Spanish-speaking interpreter is requested, but this department has received customer service inquiries in Hmong, Japanese, Russian, Swahili and Lao. Having the interpretation service at their disposal is a great comfort to the Customer Service staff.

The receptionist transfers them to Customer Service if it's a phone call. At times, the receptionist has asked a Spanish-speaking MCTS Administration employee to assist with Spanish-speaking customers. These requests are just a handful each year and the MCTS employees are always willing and happy to help.

MARKETING*: MCTS Marketing produces ad campaigns, radio ads, printed advertising on bus shelters and online advertising in Spanish. In addition, Spanish speaker for various PR opportunities so our news can be shared via the local Telemundo affiliate TV station, which is a Spanish Language news channel.*

Every service season, MCTS prints a special double issue (English/Spanish) of our on-board newsletter, "Bus Lines."

PLANNING: *The planning department at MCTS regularly participates in engagement events within Milwaukee County, during MCTS's service change related public engagements, or with partnering organizations (city, neighborhood, county, state levels). Two bilingual planning staff (English and Spanish) are present at these engagements to engage Spanish-speaking LEP persons.*

C. FACTOR 3: The nature and importance of the program, activity or service provided by the program to people's lives.

a) Identify MCTS' most critical services

MCTS reviewed and identified programs and activities that would have serious consequences to individuals if language barriers prevented a person from benefiting from the activity. The impact on actual and potential beneficiaries of delays in the provision of LEP services was also considered.

Results: *MCTS has made significant strides in providing critical services to LEP persons.*

For quarterly service changes, MCTS announces English and Spanish versions of Public Service Announcements (PSAs) about those changes. These announcements are primarily made on the impacted routes. Whenever we have a very important PSA, we also translate it into a Spanish language version. For important route updates, we've provided information in English and Spanish on signs, newsletters and our website, RideMCTS.com.

MCTS' website is equipped with a Google widget that can translate all text on the website into any language offered by Google Translate. The mobile app supports 14 languages, including Portuguese, Spanish, and Español (Latino América. In addition, MCTS has translated all signage on buses into Spanish to aid LEP individuals. A variety of the translated signs are listed below.

Knowing how to ride the bus, including:

- *How to know which bus to take;*
- *How to pay the fare;*
- *Where to buy tickets/passes, and;*
- *Accessibility issues.*

Access to informational materials and services such as:

- *Route guides and schedules;*
- *Contacting MCTS by phone;*
- *Customer Service call centers including TTY;*
- *Transit Guide containing overall system map, how to ride the bus and how to read a route guide information, and;*
- *Important route updates offered through passenger announcements, website, signs, and newsletter.*

Security Measures:

- *Importance of reporting problems on the bus to the bus operator.*

Knowledge of the rules for riders including:

- *Passenger rules of conduct which includes both passenger rights and responsibilities*
- *What is not allowed on buses – no open food or beverage, no loud music or cell phone usage, no littering.*

b) Review input from community organizations and LEP persons

Results: *In 2025, our MOVE 2025 outreach project served as a way to get public feedback on route and schedule changes. During the process, we served LEP communities through written and verbal medium. We provided Spanish-translated outreach materials, such as BusLines brochures and route-specific information. At our public engagement events for MOVE 2025, we had sign language interpreters to support deaf/HoH (hard of hearing) community members, as well as bilingual MCTS staff present to assist with interpretation and relaying engagement details.*

As always, our Customer Service team utilized Certified Languages International to support a wide range of languages for interpretation, for rider inquiries during MOVE 2025.

MCTS continues to seek input from community organizations and LEP persons. Here are our most recent actions based on community input.

- *Printed schedules are a primary source of information and yet pose a consistent obstacle for LEP persons.*
- *To make the website more accessible to non-English speakers, when it was redesigned, Google Translate was added to the navigation section of the RideMCTS.com.*
- *Have more commonly used forms and materials available and accessible.*

D. FACTOR 4: The resources available to the recipient for LEP research, as well as the associated costs associated with that outreach.

a) Inventory language assistance measures currently being provided, along with associated costs

Results: *MCTS continues to maintain production of several Spanish-language information items for distribution to our Spanish-speaking riders. These include:*

- *On board Passenger Rights – Cost approximately $900*
- *On board Passenger Fares – Cost approximately $900*
- *On board decals of safety information and rules of the bus – Collaborative piece – no specific costs*
- *Mobile app "how to" videos have a Spanish language version.*
- *Bus Lines quarterly on-board newsletter – translated into Spanish.*
- *On-board audio Public Service Announcements are broadcast on our buses¸ Spanish version plays directly after the English version.*

b) Determine what, if any, additional services are needed to provide meaningful access

Results: *The following items should be addressed to improve access to our programs and activities:*

- *Provide Spanish-language ads on Routes Guides to announce the availability of the Spanish-language How to Ride Guide*
- *Distribute Spanish-language How to Ride Guide to additional locations.*
- *Provide information to community partners/organizations that serve LEP populations to help distribute and gather feedback.*

c) Analyze our budget

Results*: Based upon MCTS' experience with LEP populations, it is determined that base level measures, such as document translations, must be in place for the Spanish-speaking population. Converting English documents to Spanish costs between $75-200 per one sheet. Additional budgetary resources may be needed in the event that demand occurs among other LEP population groups.*

d) Consider cost-effective practices for providing language services

Results: *As stated in section Factor 1 Part A, in November 2013, MCTS implemented Certified Languages International to service all foreign language interpretation needs. Their agents are available 24 hours a day, seven days a week in virtually any language in the world. Spanish-speaking translation services cost $0.99 per minute while all other languages cost $1.45 per minute. Implementing this service across all departments within the organization has increased our level of customer service proficiency, especially to Milwaukee County's growing Spanish-speaking population. Our professionalism and image in the community have improved because we are no longer turning away limited English speakers—we now have a resource to help us communicate with every single customer.*

IV. Language Assistance Plan

MCTS has implemented several key aspects into the culture of this organization that place importance on serving Milwaukee County's limited English proficiency populations. With initiatives like the Foreign Language Interpretation Service, the implementation of Remix Transit Planning software and participation in various community-related events, MCTS continues to refine and improve its service to LEP populations by taking the following measures:

a) Language Assistance Measures

MCTS will develop instructions for all front-line employees (Paratransit, Human Resources, Marketing, Bus Operators, Route Supervisors and Customer Service staff) who regularly interacts with the public, about how to effectively respond to and interact with an LEP individual.

b) Staff Training

The Department of Transportation recommends the agency inform staff about LEP policies and procedures and that staff who interact with LEP individuals receive proper training to accommodate in-person and telephone requests from such people. Those who lack proficiency in English are sometimes unable to obtain knowledge on how to access various MCTS services. The goal is to improve our level of service to all riders so that no LEP person is turned away from receiving quality customer service.

MCTS uses documents developed by the FTA Office of Civil Rights, available at https://www.transit.dot.gov/title6

Other resources include:
www.lep.gov

"How to Engage Low-Literacy and Limited English Proficient Populations in Transportation Decision making," available at:
https://www.fhwa.dot.gov/planning/publications/low_limited/index.cfm

c) Providing Notice to LEP Persons

MCTS determined there was a need for including outreach documents to be sent to community organizations, local media, schools, places of worship, RideMCTS.com and in MCTS staff training materials. MCTS even hosted several

stakeholder meetings that catered to public entities such as the ones listed above.

d) Monitoring and Updating the Plan

MCTS recognizes that, to achieve success, there must be a base level of awareness throughout the organization regarding LEP and Title VI goals and responsibilities. Employee education and awareness will evolve, and so may the LEP needs. That is why regular monitoring and updating of the LEP needs and measures employed will be necessary. MCTS is intent on carrying out and improving this plan designed to ensure that all individuals can benefit from the services provided.

V. Current Measures

MCTS has already successfully incorporated a variety of strategies for meeting the needs of LEP individuals in the service area including the following:

- *Document Translations:*
  - *For MOVE 2025, route specific handouts and outreach materials were translated into Spanish.*
  - *MCTS' website www.RideMCTS.com is available in dozens of languages, powered by Google Translate.*
  - *In-person translation – When an individual contacts MCTS with a request in Spanish, there are designated employees at various work areas who will assist with the request during office hours.*
  - *Bilingual Instructions – MCTS updated its Passenger Rights and Responsibilities bilingual (English and Spanish) interior ad cards.*
  - *Bilingual instruction cards were made to describe how to use the Ride MCTS mobile app.*
  - *A bilingual table rate sign for use at public events.*
  - *Title VI Policy: Statement of policy and procedures for making a Title VI complaint is printed in English and Spanish onboard buses and in the overall Transit Guide*
  - *Marketing translated and printed brochures related to the transition to paperless fares and distributed them on routes serving high-density LEP populations.*
- *Public Presentations:*
  - *For community events, we have at least one bilingual MCTS representative to deliver information, give demonstrations and/or answer questions.*

        - *Current Planning Manager and Service Development director are bilingual in English and Spanish and are available to translate in Spanish at any time/event as needed.*
    - *Sign-language interpreters are provided for access for those that are deaf and hard of hearing (HoH).*

MCTS will monitor the demand for services by LEP populations and use this plan as a working guide. Updates to this plan will be made as needed.

Milwaukee County Transit System
1942 North 17th Street • Milwaukee, Wisconsin • 53205-1697
(414) 344-4550 • RideMCTS.com

Milwaukee County Transit System
Inter-Office Memorandum

To: File

From: Daniel Adams, Planning Manager

Re: **Title VI - Minority Representation on Planning and Advisory Bodies**

Date: April 6, 2026

The Transit Plus Advisory Committee (TPAC) is an MCTS advisory committee that is comprised of non-elected members. Members are selected by officials on the Milwaukee County Board of Supervisors.

A list of the survey questions used to query members about their racial identity and/or ethnicity, a table depicting the racial breakdown of the committee, as well as efforts to encourage participation of minorities on those committees are shown below.

Questionnaire:
By self-identification, what is your ethnicity (cultural or national origin) and/or race? (You may choose to report more than one race to indicate racial mixture.)

- **Hispanic, Latino, or Spanish Origin**
  A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

- **White**
  A person having origins in any of the original peoples of Europe, the Middle East or North Africa.

- **Black or African-American**
  A person having origins in any of the black racial groups of Africa.

- **Native Hawaiian or other Pacific Islander**
  A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

- **American Indian or Alaska Native**
  A person having origins in any of the original people of the North and South American Continent (including Central America), and who maintain tribal affiliation or community attachment.

- **Asian**
  A person having origins in any of the original people of the Far East, Southeast Asia, or the Indian Subcontinent, including for example, Cambodia, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand or Vietnam.

Milwaukee County Transit System
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Table 1: Racial Breakdown of the Membership of Advisory Committees

	Transit Plus Advisory Committee
Approved Membership Positions	13
Filled Membership Positions	11
Members Completing Survey	11
Hispanic, Latino, or Spanish Origin	1
White	2
Black or African-American	8
Native Hawaiian or other Pacific Islander	0
American Indian or Alaska Native	0
Asian	0

DEPARTMENT OF TRANSPORTATION
10320 W. Watertown Plank Road
Second Floor
Wauwatosa, WI 53226
(414) 257-5992

DATE: April 10, 2026

TO: Jesus Ochoa, Director, Department of Service Development, MCTS

FROM: Kirsten Mawhinney, Senior Grants Compliance Manager, MCDOT

SUBJECT: Milwaukee County Monitoring of Subrecipient Title VI Programs for the Federal Transit Administration Section 5310 Program within the Milwaukee Urbanized Area.

BACKGROUND

On November 15, 2021, the current federal transportation authorization legislation *Infrastructure Investment and Jobs Act (IIJA)* was signed into law and continues the Enhanced Mobility of Seniors and Individuals with Disabilities Program (Section 5310 Program).

The Section 5310 Program provides federal funds to help eligible entities purchase vehicles and other capital items to transport seniors and people with disabilities, as well as to expand transportation mobility options for persons with disabilities. These funds can be used for operating or capital assistance, and are available to private non-profits or government agencies.

Milwaukee County is the sole designated recipient for the Section 5310 Program funds in the Milwaukee urbanized area that includes Ozaukee, Washington and Waukesha Counties. As the designated recipient, Milwaukee County is responsible for administering grant agreements, monitoring compliance of subrecipients applying for federal funds, and satisfying documentation and reporting requirements to the Federal Transit Administration (FTA).

Recipients of the Milwaukee urbanized area's Section 5310 Program funds are required to meet civil rights requirements under Title VI.

Title VI

The elements of a Title VI Program are determined by FTA Circular 4702.1B (Appendix A) and include, but are not limited to:

- Title VI notice to the public, including a list of locations where the notice is posted
- Title VI complaint procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint) and Title VI complaint form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public participation plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees

- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.

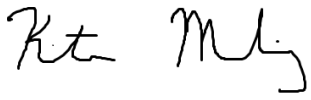
The Milwaukee County Transit System prepares a Title VI Program Update for submission to the FTA every three years. Similarly, Section 5310 Program subrecipients must submit their Title VI Programs to Milwaukee County on a triennial basis. A subrecipient's Title VI program must be approved by the subrecipient's appropriate governing entity or official(s) responsible for policy decisions (e.g., board of directors, mayor, tribal executive, city administrator, etc.). Subrecipients may submit a copy of the board resolution, meeting minutes, or similar documentation as evidence of approval.

Contractors and subcontractors are not required to submit a Title VI report. However, they are responsible for complying with the Title VI Program of the recipient with whom they are contracting. Recipients and subrecipients are responsible for ensuring that their contractors are complying with their Title VI Program and Title VI regulations.

Milwaukee County is available to assist subrecipients with Title VI compliance. Milwaukee County provides sample notifications, forms, and program language to subrecipients upon request. Milwaukee County oversees subrecipient compliance with Title VI as follows:

- **Grant Agreements** – Through grant agreements, the subrecipient agrees to comply with applicable civil rights statutes and regulations. As subrecipients to Milwaukee County, Section 5310 Program subrecipients must comply with the FTA's Annual List of Certifications and Assurances signed annually by Milwaukee County.
- **Review of Subrecipient's Title VI Program** – Milwaukee County reviews the contents of Title VI Program materials as submitted by subrecipients, including public notification language, LEP, complaint procedures and complaint form, and public participation and outreach.
- **Investigation and Monitoring of Title VI Complaints (or potential complaints and/or lawsuits)** – Milwaukee County requires subrecipients to report any Title VI complaints or lawsuits. Subrecipients may contact Milwaukee County at any time during the year to report Title VI complaints, potential complaints, and/or lawsuits. Milwaukee County may also receive complaints regarding subrecipients or their contractors directly from the public.
- **On-Site Visits** – Milwaukee County staff conducts on-site visits as necessary to monitor subrecipient compliance. During on-site visits, staff will verify the location of the public notification language as stated in the subrecipient's Title VI Program. During this time, staff may also discuss with the subrecipient any new or potential opportunities for public participation and public outreach that may present themselves since the previous submission of the subrecipient's Title VI Program.

Prepared by:



Kirsten Mawhinney
Senior Grants Compliance Manager
Milwaukee County Department of Transportation

COUNTY OF MILWAUKEE
Inter-office Communication

Date: 5/21/2026

To: Marcelia Nicholson-Bovell, Chairwoman, Milwaukee County Board of Supervisors

From: Joseph Lamers, Director, Department of Transportation; Steve Fuentes, President & CEO, Milwaukee County Transit System

Subject: From the Director, Department of Transportation and the President & CEO, Milwaukee County Transit System providing an action report regarding Title VI Equity Analysis, and Service and Fare Equity Analysis. This Action Report is also responsive to Reference File 26-26.

File Type: Action Report

POLICY
Title VI of the Civil Rights Act of 1964 states: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. This Action Report is also responsive to Reference File 26-26.

BACKGROUND
The Federal Transit Administration (FTA) requires transit providers to prepare a Title VI Program Plan Update every three years to document compliance. The purpose of the Plan Update is to ensure that transit services are provided in a non-discriminatory manner, to promote full and fair participation in transit decision-making without regard to race, color, or national origin, and to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency.

As a recipient of FTA funds, MCTS must document the Plan Update has been approved by the County Executive and County Board of Supervisors prior to the submittal deadline of October 1, 2026. The Milwaukee County Department of Transportation submits the Plan Update on behalf of MCTS to FTA. The 2023 Title VI Plan Update was approved by the County Board of Supervisors in July 2023 (File #23-700) and is available at http://www.ridemcts.com/about-us/title-vi-policy.

The Plan Update is required to include the following content:
- Notice to the Public, Complaint Procedures and Form, and a Summary of Complaints
- Public Participation Plan and Public Outreach & Involvement Activities
- Limited English Proficiency Plan

- Minority Representation on Planning and Advisory Bodies
- Monitoring of Sub-recipient Title VI programs
- Approval of Title VI Program by the Governing Entity
- Definitions of Major Service Change, Disparate Impact, and Disproportionate Burden
- Service Standards / Policies and Demographic data on minority / low-income populations
- Service and Fare Equity Analyses of major service changes and fare changes

Finally, it should be noted these actions are consistent with and relevant to Milwaukee County General Ordinance Chapter 108 Achieving Racial and Health Equity.

ALIGNMENT TO STRATEGIC PLAN

Describe how the item aligns to the strategic plan:

2A: Determine what, where, and how we deliver services to advance health equity.
2C: Apply a racial equity lens to all decisions.
3A: Invest "upstream" to address root causes of health disparities.
3C: Dismantle barriers to diverse and inclusive communities.

RECOMMENDATION

The Director, Department of Transportation recommends approval of and submission of the MCTS 2026 Title VI Program Plan Update to the Federal Transit Administration prior to the October 1, 2026, deadline.

FISCAL EFFECT

There is no fiscal impact of this report.

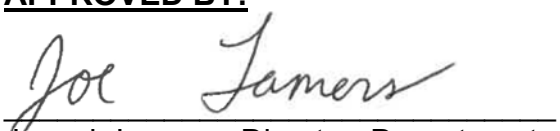
VIRTUAL MEETING INVITES

Joe Lamers, Director, Department of Transportation
John Rodgers, Deputy Director, Department of Transportation
Steve Fuentes, President & CEO, MCTS, sfuentes@mcts.org
Ruben Salas, Vice-President & Deputy CEO, MCTS, rsalas@mcts.org
Jesus Ochoa, Director of Service Development, MCTS, jochoa@mcts.org
Dan Adams, Planning Manager, MCTS, dadams@mcts.org

PREPARED BY:

Jesus Ochoa, Director of Service Development, Department of Service Development, MCTS
Dan Adams, Planning Manager, Department of Service Development, MCTS

APPROVED BY:



Joseph Lamers, Director, Department of Transportation

ATTACHMENTS:
Resolution
Fiscal Note
PowerPoint

cc: Kelly Bablitch, Chief of Staff, County Board of Supervisors
Janelle M. Jensen, Director of Legislative Services, Office of the County Clerk

File No. 26-493

From the Director, Department of Transportation and the President & CEO, Milwaukee County Transit System providing an action report regarding Title VI Equity Analysis, and Service and Fare Equity Analysis. This Action Report is also responsive to Reference File 26-26, by recommending adoption of the following:

A RESOLUTION

WHEREAS, Title VI of the Civil Rights Act of 1964 (Title VI) states, “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance”; and

WHEREAS, the Federal Transit Administration (FTA) requires transit providers to prepare a Title VI Program Plan Update (the Plan Update) every three years to document compliance; and

WHEREAS, the purpose of the Plan Update is to ensure that transit services are provided in a non-discriminatory manner, to promote full and fair participation in transit decision making without regard to race, color, or national origin, and to ensure meaningful access to transit-related programs and activities by persons with limited English proficiency; and

WHEREAS, the FTA requires approval of the Plan Update by the County Executive and the Milwaukee County Board of Supervisors prior to the submittal deadline of October 1, 2026; and

WHEREAS, the Committee on Transportation and Transit (T&T), at its meeting of June 10, 2026, laid over File No. 26-493 to a date certain (July 15, 2026) (vote 5-0); and

WHEREAS, T&T, at its meeting of July 15, 2026, recommended adoption of File No. 26-493 (vote 5-0); now, therefore,

BE IT RESOLVED, the Milwaukee County Board of Supervisors hereby approves the Milwaukee County Transit System’s 2026 Title VI Program Plan Update and authorizes the Department of Transportation to submit the approved plan to the Federal Transit Administration.

etm
07/15/26
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COUNTY OF MILWAUKEE
INTEROFFICE COMMUNICATION

DATE: June 23, 2014

TO: Michael Mayo, Sr., Chairperson, Transportation, Public Works and Transit Committee

FROM: Brian Dranzik, Director, Department of Transportation

SUBJECT: Resolution Approving of Milwaukee County Transit System (MCTS) Title VI Policy Definitions for Major Service Change, Disparate Impact, and Disproportionate Burden

POLICY

Title VI of the Civil Rights Act of 1964 states: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Title VI is codified under U.S. Department of Transportation Regulations (49 CFR part 21). The Federal Transit Administration (FTA) establishes requirements for transit systems with respect to Title VI under FTA Circular 4702.1B; Chapter IV, Section 3a (2)(e) of which establishes a requirement for board approval of Title VI policy definitions for major service change and disparate impact used by a transit system.

BACKGROUND

The FTA requires transit systems to analyze proposed service changes and fare changes to determine if there is potential for a disparate impact on minority populations or a disproportionate burden on low-income populations. Disparate impacts and disproportionate burdens are to be considered, and mitigated as possible. Prior to performing the required analysis, it is necessary to establish local policy definitions for "major service change," "disparate impact" and "disproportionate burden."

The FTA requires transit systems to use a public engagement process when establishing these local definitions. Furthermore, the FTA requires the Milwaukee County Transit System (MCTS)

to obtain County Executive and County Board approval of major service change and disparate impact policy definitions.
In October 2013, MCTS conducted two public outreach meetings to inform the public of proposed policy definitions and gather input about the policies. Meetings were held at the Center Street Library and at the Downtown Central Library. About 90 persons from the community attended these meetings. Based on the feedback received from the public, MCTS recommends the following policy definitions for approval by the County Executive and County Board.

MAJOR SERVICE CHANGE POLICY

A Major Service Change is defined as a change that:

- Affects 25 percent of the in-service bus hours on a route or group of routes,
- Affects 25 percent of the one way mileage of a route or group of routes,
- Affects 25 percent of the daily service period,
- Reduces the service span by more than an hour during the late night (930 pm to 6 am)
- Reduces the frequency of service (increases the headway) by 50 percent, and
- Creates a gap of greater than one-half mile from the nearest alternative service.

DISPARATE IMPACT POLICY / DISPROPORTIONATE BURDEN POLICY

MCTS uses the four-fifths rule, also known as the 80 percent rule, as the threshold for its disparate impact and disproportionate burden policies. Specifically, an impact has occurred when the ratio of the reduction in service to the minority or low-income population compared to the non-minority or non-low-income population exceeds four/fifths or 80 percent. The four-fifths rule is a commonly accepted measure used by many transit systems.

RECOMMENDATION

Approve the resolution defining the MCTS major service change policy and disparate impact policy.

Prepared by: Tom Winter, Director of Schedule and Planning, MCTS
Daniel Boehm, Interim Managing Director, MCTS

Approved by:

_____
Brian Dranzik
Director, Department of Transportation

cc: Chris Abele, Milwaukee County Executive
Marina Dimitrijevic, Chairwoman, County Board of Supervisors
Kelly Bablitch, Chief of Staff, County Board of Supervisors
Raisa Koltun, Interim Chief of Staff, Milwaukee County Executive Office
John Zapfel, Deputy Chief of Staff, Milwaukee County Executive Office
Don Tyler, Director, Department of Administrative Services
Josh Fudge, Fiscal and Budget Administrator, Department of Administrative Services
Anthony Geiger, Fiscal and Budget Analyst, Department of Administrative Services

Chapter IV

PUBLIC TRANSIT SERVICE OBJECTIVES AND STANDARDS

INTRODUCTION

One of the critical steps in the preparation of a transit system development plan is the articulation of the objectives to be served by the transit system, together with the identification of supporting standards that can be used to measure the degree of attainment of the objectives. The objectives and standards provide the basis for assessing the performance of the existing transit system, identifying unmet transit service needs, designing and evaluating alternative transit system plans, and recommending service changes and improvements. The objectives and standards formulated under this study are intended to represent the level of transit performance desired by Milwaukee County.

This chapter presents the public transit service objectives, principles, and standards that were formulated and applied under the County's transit system development plan. The objectives and supporting standards set forth in this chapter may also be used by the County to guide in the design, operation, and review of its transit services after completion of this planning effort.

OBJECTIVES

The transit service objectives, principles, and standards set forth in this chapter are intended to reflect the underlying values of the elected officials and residents of Milwaukee County. One of the important functions of the Milwaukee County Public Transit Planning Advisory Committee was to articulate transit service objectives, principles, and supporting standards for the planning effort. By drawing upon the collective knowledge, experience, views, and values of the members of the Committee, it is believed that a meaningful expression of the performance desired for the Milwaukee County Transit System was obtained, and a relevant set of transit service objectives and supporting principles and standards was defined.

The specific objectives adopted envision a transit system that will effectively serve transit travel by Milwaukee County residents both within the County and between the County and other adjacent communities in the Milwaukee urbanized area. More specifically, the following objectives were adopted by the Advisory Committee:

1. The public transit system should effectively serve the existing land use pattern and support the implementation of planned land uses, meeting the demand and need for transit services, and particularly the needs of the transit-dependent population;

2. The transit system should promote effective utilization of transit service and operate service that is reliable and provides for user convenience and comfort;

3. The transit system should promote the safety and security of its passengers, operating equipment and facilities, and personnel;

4. The public transit system should promote efficiency in the total transportation system; and

5. The public transit system should be economical and efficient, meeting all other objectives at the lowest possible cost.

PRINCIPLES AND STANDARDS

Complementing each of the foregoing transit service objectives is a planning principle and two sets of service standards, as set forth in Table 32. The planning principle supports each objective by asserting its validity. Each set of standards is directly related to the transit service objective and serves several purposes. The service design and operating standards are intended to primarily provide guidelines for the design of new and improved services, the operation of the transit system, and the acquisition of capital equipment and construction of facilities. The service performance standards primarily facilitate the evaluation of the performance of the existing transit system and of alternative service improvements. For each performance standard, one or more criteria are identified which can be used to quantify the performance of the transit service for measurement against the standard.

The performance evaluation of the existing transit system undertaken for the current study included assessments of transit performance on both a systemwide basis and on an individual route basis. The performance standards set forth in Table 32 represent the specific standards and performance measures that were applied in conducting these evaluations. The performance standards in Table 32 include the transit system performance measures which the Wisconsin Department of Transportation utilizes to assess the performance of Wisconsin transit systems, and which the State requires be included in multi-year service and performance goals for each such transit system. Such measures include operating ratio, or farebox recovery rate; operating expense per passenger; passengers per capita; passengers per revenue vehicle hour of service; operating expenses per revenue vehicle hour of service; and revenue vehicle hours of service per capita. The performance standards and evaluation findings of this study can, therefore, provide guidance to the County in establishing the required multi-year service and performance goals.

OVERRIDING CONSIDERATIONS

The objectives, principles, and standards set forth in Table 32 were intended to be used to guide the evaluation of the performance of the existing transit system and the design and evaluation of alternative service improvements. In the application of the objectives, principles, and standards, several overriding considerations must be recognized.

First, it must be recognized that an overall evaluation of the existing public transit services and the alternative service plans must be made on the basis of cost and revenue. Such an analysis may show the attainment of one or more standards to be beyond the economic capability of the community and, therefore, the standards cannot be met practically and must be either modified or eliminated.

Second, it must be recognized that a transit system is unlikely to fully meet all the standards and that the extent to which each standard is met, exceeded, or violated must serve as the final measure of the ability of the system to achieve the objective that a given standard supports.

Third, it must be recognized that certain intangible factors, including the perceived value of the transit service to the County and its potential acceptance by the concerned elected officials, may influence the preparation and selection of a recommended plan. Inasmuch as transit service may be perceived as a valuable service, the County may decide to initiate or retain such services regardless of performance or cost. Only if a considerable degree of such acceptance exists will service recommendations be implemented and their anticipated benefits realized.

Table 32

PUBLIC TRANSIT SERVICE OBJECTIVES, PRINCIPLES, STANDARDS, AND PERFORMANCE MEASURES FOR BUS SERVICE PROVIDED BY THE MILWAUKEE COUNTY TRANSIT SYSTEM

Objective	Principle	Standards	Performance Measure
1. The public transit system should effectively serve the existing land use pattern and support the implementation of planned land uses, meeting the demand and need for transit services, and particularly the needs of the transit-dependent population	Public transit is an essential element of the transportation system, connecting major land use activities and providing the accessibility essential to the support of these activities. Transit services are most cost-efficient when serving areas that are fully developed to medium and high densities. Transit also provides an important means of access to jobs and services for all segments of the population, but particularly for persons who must depend on transit as their primary means of travel. Accessible mainline bus service can promote flexible and cost-effective transit service by reducing expenditures for paratransit services.	Service Design and Operating Standards 1. The public transit system should serve travel demand generated within contiguous areas of urban development in the urbanized area and should be designed to provide for a higher degree of accessibility to areas of high density (7.0-17.9 dwelling units per net residential acre), and medium density (2.2-6.9 dwelling units per net residential acre) urban development than to areas of low-density development or which should be protected from development	1. --
		2 Public transit services should be designed and operated so as to permit the orderly and efficient expansion of service to developing areas	2. --
		3. Public transit services should be provided that address the varied travel and mobility needs of the County population and offer access to the major activity centers in the urbanized area. The transit services provided should include: a. Rapid and express service designed to reduce travel times for the longest trips made between component parts of the transit service area and to connect areas of high and medium density urban development to the Milwaukee central business district and the largest major activity centers b. Local service designed to provide transit within and between residential areas, to link residential areas with nearby major activity centers, and to provide for transfer connections with rapid, express, and other local services c. Local shuttle services designed to connect with rapid, express, and local services serving major activity centers d. Paratransit service designed to meet the needs of people with disabilities who are unable to use accessible mainline bus service	3. --
		4 The public transit system should serve and connect major activity centers in the urbanized area that currently generate, or have the potential to generate, significant ridership including: a. Housing facilities serving transit-dependent persons who are living independently including elderly persons, people with disabilities, and low-income individuals b. Principal hospitals and medical centers c. Major retail shopping malls d. Principal colleges and universities e. Major Federal, State, and local governmental offices and institutions f. Major employers with more than 500 employees at one site g. Major industrial and office parks h. Major passenger terminals for intercity bus, passenger rail, and airline carriers i. Major public and private recreational centers hosting high attendance events	4. --
		Service Performance Standards 1. The population served should be maximized, particularly those who are transit-dependent. The population shall be considered as served when it resides within the following distances of transit service: Maximum Distance from a Bus Stop Service Type / Walking / Driving Rapid / 1/2 Mile / 3 Miles Express / 1/2 Mile / -- Local / 1/4 Mile / --	1. The number of people residing within appropriate walking or driving distance of a bus stop and the percent of the total population represented
		2. The major activity centers and jobs served should be maximized. Major activity centers and jobs shall be considered as served when located within the following distance of transit service: Service Type / Maximum Walking Distance from a Bus Stop Rapid / 1/2 Mile Express / 1/2 Mile Local / 1/4 Mile	2. The number of major activity centers and jobs located within appropriate walking distance of a bus stop and the percent of the total activity centers and jobs represented
		3. The transit supportive land area served should be maximized. To be considered transit supportive, an area should have a density of at least 4 dwelling units per net residential acre, or at least 4 jobs per gross acre	3. The proportion of the transit supportive land area located within one-quarter mile of a local bus route

Table 32 (continued)

<table>
<tr><th>Objective</th><th>Principle</th><th>Standards</th><th>Performance Measure</th></tr>
<tr><td>1. (continued)</td><td>(continued)</td><td>4. The public transit system should provide service within the urbanized area that maximizes the population that is:
a. Within 45 minutes overall transit travel time of 40 percent of the jobs in the urbanized area
b. Within 35 minutes overall transit travel time of a major shopping mall
c. Within 40 minutes overall transit travel time of a major college or university
d. Within 30 minutes overall transit travel time of a major hospital or medical center
e. Within 40 minutes overall transit travel time of a major Federal, State, or local governmental office or public institutional center
f. Within 60 minutes overall transit travel time of a major passenger terminal for an intercity bus, passenger rail, or airline carrier
g. Within 60 minutes overall transit travel time of a major public or private recreational center hosting high attendance events</td><td>4. The number of people residing within each of the prescribed travel times and the percent of the total population represented</td></tr>
<tr><td rowspan="8">2. The transit system should promote effective utilization of transit service and operate service that is reliable and provides for user convenience and comfort.</td><td rowspan="8">The benefits of a public transit system are, to a large extent, greatly related to the degree to which it is used as measured by transit ridership. Ridership is a function of the degree to which people have access to transit services which are reliable and provide for quick, convenient, and comfortable travel. Riders view transit services with these attributes as an effective and attractive alternative to the private automobile.</td><td>Service Design and Operating Standards
1. Public transit routes should have direct alignments with a limited number of turns, and should be arranged to minimize duplication of service and unnecessary transfers which would otherwise discourage transit use.</td><td>1. - -</td></tr>
<tr><td>2. Rapid and express transit routes should be extended as needed to perform a collection-distribution function at the ends of the route</td><td>2. - -</td></tr>
<tr><td>3. Public transit service that does not meet service performance standards may be warranted in special instances if it improves total system continuity and/or provides significant feeder service or transfer opportunities to other routes</td><td>3. - -</td></tr>
<tr><td>4. Bus stops should be clearly marked by easily recognized bus stop signs and located so as to minimize the walking distance to and from residential areas and major activity centers over an accessible path for all users including people with disabilities, and to facilitate connections with other transit services where appropriate. The suggested locations and spacing for stops are as follows:</td><td>4. - -</td></tr>
<tr><td><table><tr><th>Service Type</th><th>Stop Locations and Spacing</th></tr><tr><td>Rapid</td><td>At terminal areas and one-mile or more on line-haul sections</td></tr><tr><td>Express</td><td>At terminal areas, intersecting transit routes, signalized intersections with arterial streets, and major activity centers</td></tr><tr><td>Local</td><td>600 to 1,200 feet (two to three blocks) apart</td></tr></table></td><td></td></tr>
<tr><td>5 The public transit system should be designed and operated so as to achieve the following minimum overall travel speeds by area based on average weekday conditions:
<table><tr><th></th><th colspan="3">Travel Speed (miles per hour)</th></tr><tr><th>Service Type</th><th>CBD</th><th>Central City</th><th>Outlying Areas</th></tr><tr><td>Rapid</td><td>5-10</td><td>15-30</td><td>40-55</td></tr><tr><td>Express</td><td>5-10</td><td>15-20</td><td>25-35</td></tr><tr><td>Local</td><td>5-10</td><td>12-15</td><td>18-25</td></tr></table></td><td>5. - -</td></tr>
<tr><td>6 The hours of service operation for the public transit system should serve the demand generated by the land use activities served by, and the function of, each route. Service periods should also accommodate the travel needs of those who depend on the transit system as their primary travel mode. The transit system should, therefore, strive to operate routes with service hours as follows:
<table><tr><th></th><th colspan="3">Desirable Service Hours</th></tr><tr><th>Service Type</th><th>Weekdays</th><th>Saturdays</th><th>Sundays/ Holidays</th></tr><tr><td>Rapid</td><td>6:00 a.m.-10:00 p.m.</td><td>6:00 a.m.-10:00 p.m.</td><td>6:00 a.m-10:00 p.m.</td></tr><tr><td>Express</td><td>5:00 a.m.-11:00 p.m.</td><td>5:00 a.m.-11:00 p.m.</td><td>5:00 a.m-11:00 p.m.</td></tr><tr><td>Local</td><td>5:00 a.m. - 1:00 a.m.</td><td>5:00 a.m. - 1:00 a.m.</td><td>5:00a.m. - 1:00 a.m.</td></tr></table></td><td>6. - -</td></tr>
<tr><td>7 The availability of weekend and holiday service enhances the attractiveness of weekday service and positively affects system ridership by providing that regular weekday riders need not seek alternative travel modes. Therefore, a reasonable level of service should also be maintained on weekends and holidays.</td><td>7. - -</td></tr>
<tr><td>8. Operating headways for public transit fixed-route service should be capable of accommodating passenger demand at the recommended load standards, and should also provide for a convenient service so as to encourage transit use. The desirable headways presented below represent a frequency of transit service that would be desirable to provide a service of high quality and to promote transit ridership. Lower headways may be provided in the core service area[a] for the system and high density corridors of heavy travel demand, while only higher headways may be feasible in areas of low and medium density.
<table><tr><th></th><th colspan="2">Desirable Headway (minutes)
Weekday</th><th>Weekend</th></tr><tr><th>Service Type</th><th>Peak Period</th><th>Off-Peak Period</th><th>Periods/ Holidays</th></tr><tr><td>Rapid</td><td>10</td><td>20</td><td>30</td></tr><tr><td>Express</td><td>10</td><td>20</td><td>30</td></tr><tr><td>Local</td><td>10</td><td>20</td><td>30</td></tr></table></td><td>8. - -</td></tr>
</table>

Table 32 (continued)

Objective	Principle	Standards	Performance Measure
2. (continued)	(continued)	8. (continued) Operating headways should not exceed the following maximum headways throughout the service area when service is offered: Maximum Headway (minutes) Weekday: Peak Periods / Off-Peak Periods; Weekend: Periods/ Holidays Rapid: 30 / 60 / 60 Express: 30 / 60 / 60 Local: 30 / 60 / 60	
		9. All transit vehicles should be equipped with padded seats, heating/air conditioning units, and wheelchair lifts/ramps that are in good working condition. Window treatments should maintain outward visibility for passengers. Vehicle interiors and exteriors should be cleaned and inspected daily with needed equipment repairs made on a timely basis	9. - -
		10. Consideration should be given to rehabilitating or replacing each public transit vehicle at the end of its normal service life, which shall be defined as follows: Vehicle Type: Length (feet); Normal Service Life: Years / Mileage Heavy-duty bus: 35 or more; 12; 500,000 Heavy-duty bus: 25-30; 10; 350,000 Medium-duty bus: 25-30; 7; 200,000 Light-duty bus: 25-30; 5; 150,000	10. - -
		11. Consideration should be given to providing passenger shelters of an attractive design at all bus stops where warranted by existing conditions including: boarding passenger counts, passenger waiting time, bus stop situation, exposure to weather conditions, and the facility or land use being served.[b] Access to shelters for people with disabilities should be maintained.	11. - -
		12. Park-ride facilities should be provided at appropriate stops on rapid and express services to serve transit users from medium and low density residential areas. Sufficient off-street automobile parking should be provided at park-ride facilities to accommodate the total parking demand generated by transit users and carpoolers	12. - -
		13. Provisions for transporting bicycles on transit vehicles should be considered	13 - -
		Service Performance Standards 1. Ridership on the transit system and the overall effectiveness of the services provided should be maximized.	1a. Total passengers 1b. Total passengers per capita 1c. Revenue vehicle hours per capita 1d. Total passengers per revenue vehicle hour 1e. Total passengers per revenue vehicle mile
		2. Ridership and service levels on each transit route should be monitored and service levels adjusted to be appropriate for demand levels unless special circumstances warrant otherwise[c].	2a. Total boarding passengers per revenue vehicle mile 2b. Total boarding passengers per revenue vehicle hour 2c. Productivity frequency index[d]
		3. The minimum service effectiveness levels to warrant continued service operation shall be as specified below, unless special circumstances warrant otherwise[c]: Service Period: Total Boarding Passengers Per Revenue Vehicle Hour Weekdays: 22[e] Saturdays: 15[e] Sundays/Holidays: 10[e]	3. Total boarding passengers per revenue vehicle hour
		4. The average maximum load factor, measured as the ratio of passengers to bus seats at that point on a route where passenger loads are highest, should not exceed the following during any one-hour period: Average Maximum Load Factor Service Type: Peak Periods / All Other Times Rapid: 1.00 / 1.00 Express: 1.33 / 1.00 Local: 1.33 / 1.00	4. Average maximum load factor by route for the weekday peak hour of service
		5 The transit system should be designed and operated to maximize schedule adherence and be "on-time" at least 90 percent of the time. On-time is defined as schedule adherence within the ranges of one minute early and three minutes late.	5. Percent of scheduled bus trips on time
		6. Travel for public transit passengers should be reasonable in comparison to travel by private automobile for trips made between component parts of the service area. Transit travel distances and times should not be more than 1.5 times longer than with the automobile travel for comparable trips	6a. Ratio of transit to highway distance 6b. Ratio of transit to highway travel time

Table 32 (continued)

Objective	Principle	Standards	Performance Measure
2. (continued)	(continued)	7. Preventative maintenance policies and practices should be established to maximize the reliability of revenue vehicles so that: a. All of the vehicles required to operate peak service are available daily b. The number of breakdowns requiring a maintenance road call do not exceed one per 6,000 vehicle miles of service	7a. Number of buses available for weekday peak service versus peak bus requirement 7b. Percent of buses that miss scheduled pull-outs 7b. Vehicle miles between road calls
3. The transit system should promote the safety and security of its passengers, operating equipment and facilities, and personnel and project a positive image to the general public.	Accidents take a heavy toll in property damage and human suffering, and can contribute substantially to the overall costs of operation for the public transit system and, in particular, the public funds required. Incidences that jeopardize the security of passengers or transit system property may promote the perception that transit travel is not safe, thereby hampering the mobility of persons who must travel within areas the public deems unsafe. Therefore, every attempt should be made in the operation of the transit system to reduce the incidence and severity of accidents and to increase security for transit passengers, equipment and facilities, and personnel	<u>Service Design and Operating Standards</u> 1. Public transit service should not be operated over streets that exhibit conditions that may be hazardous for transit operations including steep grades, narrow traffic lanes, uncontrolled intersections, poor pavement conditions, or habitual problems with illegal parking	1. - -
		2. Nearside bus stops facilitate passenger use of crosswalks and convenience in transferring between routes, provide for adequate sight considerations for vehicle operators, and allow transit vehicles to utilize the intersection to merge into traffic. The use of nearside locations for bus stops on a consistent basis is also favored by people with disabilities. Therefore, bus stops should generally be located at the nearside of intersections to promote passenger safety and the safe operation of transit vehicles. Stops may be located elsewhere if warranted by special circumstances	2. - -
		3. Bus stops should not be located in areas without adequate pedestrian facilities such as sidewalks or adequately maintained roadway shoulders that provide for a safe and accessible travel path for all users including people with disabilities.	3. - -
		4. The public transit system should promote the use of appropriate security equipment and practices--such as mobile radios, automatic vehicle location (AVL) hardware, cameras, passenger information kiosks with security call boxes, and security personnel--to enhance the security of passengers and transit system equipment, facilities, and personnel	4. - -
		<u>Service Performance Standards</u> 1. The number of accidents on the public transit system should be minimized	1. The number of accidents on the transit system per 100,000 vehicle miles of service
		2. The number of security incidences on transit property should be minimized	2. The number of security incidences on the transit system per 100,000 vehicle miles of service
4. The public transit system should promote efficiency in the total transportation system	Public transit facilities and services can promote economy and efficiency in the total transportation system. The transit system has the potential to supply additional passenger transportation capacity, which can alleviate peak loadings on arterial street facilities and assist in reducing the demand for land necessary for parking facilities at major activity centers. Efficient transit service also has the potential to reduce energy consumption and air pollutant emissions	<u>Service Performance Standards</u> 1. The total amount of energy and the total amount of energy per passenger mile consumed in operating the total transportation system of which the public transit system is an integral part, particularly petroleum-based fuels, should be minimized	1. Passenger miles per gallon of motor fuel
		2. The amount of highway system capacity which must be provided to serve travel demand should be minimized	2. Potential increase in vehicle traffic on surface streets if transit trips use automobile
5. The public transit system should be economical and efficient, meeting all other objectives at the lowest possible cost	The total financial resources of the County are limited and any investment of funds in public transit facilities and services must be weighed against other public investments. Therefore, total transit system costs should be minimized for the desired level of transit service and transit revenues should be maximized to maintain the financial stability of the services. The attainment of this objective may at times conflict with, and require the modification or elimination of, other standards	<u>Service Design and Operating Standards</u> 1. The total operating and capital investment for the public transit system should be minimized and reflect efficient utilization of resources	1. - -
		2. The fare policy for the public transit system should provide for premium fares for premium transit services, as well as special or discounted fares for priority population groups and frequent transit riders	2. - -
		3. Periodic increases in passenger fares should be considered to maintain the financial stability of the public transit system when: a. The farebox recovery rate for the transit system goes below levels determined to be acceptable by local officials b. Operating expenses for the transit system have increased by 10 to 15 percent since fares were last raised c. Projected levels of Federal and State operating assistance funds would require an increase in projected local operating assistance levels above that determined to be acceptable by local officials	3. - -
		4. Public transit service should not be extended to communities or major activity centers located outside the County at the direct expense of County taxpayers. The net local costs—total costs minus passenger revenues and Federal and/or state assistance funds—of such transit service shall be provided through sources other than County tax dollars unless special circumstances warrant otherwise	4. - -

Table 32 (continued)

Objective	Principle	Standards	Performance Measure
5. (continued)	(continued)	Service Performance Standards 1. The operating expense per unit of transit service, the operating expense per passenger, and the total operating assistance per passenger should be minimized for the public transit system as a whole. Annual increases in such costs should not exceed the average percentage increase experienced by comparable transit systems	1a. Operating expense per revenue and total vehicle mile 1b. Operating expense per revenue and total vehicle hour 1c. Operating expense per boarding passenger 1d. Total operating assistance per boarding passenger
		2. Public transit system operating revenues generated from passenger fares and private sources should be maximized.	2. Percent of operating expenses recovered through passenger and other operating revenues, excluding public operating assistance
		3. The total operating expense per passenger and total operating assistance per passenger should be minimized for the public transit system as a whole. Annual increases in such costs should not exceed the average percentage increase experienced by comparable transit systems	3a. Total operating expense per boarding passenger 3b. Total operating assistance per boarding passenger
		4. Cost effectiveness levels on each transit route should be monitored and service levels adjusted to be appropriate for demand levels or the route eliminated unless special circumstances warrant otherwise[c]. Cost effectiveness levels shall be measured using the total boarding passengers per revenue vehicle hour for each route.	4a. Total boarding passengers per revenue vehicle hour

[a]The "core service area" for the transit system is the area bounded by Capitol Drive on the north, Oklahoma Avenue on the south, 76th Street on the west, and Lake Michigan on the east.

[b]Potential bus shelter locations shall be reviewed and scored against criteria which are deemed to warrant the construction of a shelter, with a range of point values assigned to conditions for the criteria that rate the relative need for a shelter. The total point value for each location shall determine its rank in a prioritized listing of potential sites with a maximum possible total score of 100 points for each location. The criteria and conditions used to rank bus shelter locations are as follows:

Conditions Warranting Bus Shelter	Point Value
Boarding Passenger Counts	
Less than 25 passengers	0
25-74 passengers	10
75-149 passengers	20
150-299 passengers	30
300 or more passengers	40
Passenger Waiting Time (one-half of the midday headway)	
Less than 3.0 minutes	0
3.1-6.0 minutes	4
6.1-9.0 minutes	8
9.1-12.0 minutes	12
12.1-15.0 minutes	16
More than 15.0 minutes	20
Bus Stop Situation	
Not a transfer point	0
Transfer point	10
Exposure to Weather Conditions	
None	0
Minimum	5
Average	10
Full	20

Conditions Warranting Bus Shelter	Point Value
Facility or Land Use Being Served (values are additive up to a maximum of 10 points)	
Not a transit trip generator	0
Commercial or shopping center	5
Industrial plant or office building	5
Park or recreation center	5
Other significant transit trip generator	5
High density residential area	10
Facility or activity for elderly individuals	10
Facility or activity for people with disabilities	10
Hospital, medical center, or clinic	10
University, college, or public secondary school	10

[c]A reasonable period of time should be allowed for ridership to develop and stabilize before evaluating the performance of new transit services to determine if the service should be continued, modified, or eliminated. Generally, new transit services should achieve 40 percent of average performance levels for existing routes after six months of operation; 60 percent of average performance levels for existing routes after nine months of operation; and 80 percent of average performance levels for existing routes after one year of operation. The period for services that are funded through Federal or state transit demonstration grants may be extended to coincide with the period for the demonstration grant.

[d]The productivity frequency index (PFI) is an analytical tool developed by the Milwaukee County Transit System which measures the relationship between passengers per revenue vehicle hour of service and the service frequency, or headway on each bus route. The index is calculated for each route in the transit system by service period as follows:

$$\text{PFI} = \text{Boarding Passengers per Revenue Vehicle Hour} \times \frac{\text{Average Headway on Route}}{\text{60 Minutes}}$$

The PFI values calculated for each route are compared against target values for the transit system to assist in determining if changes in the headways on the route should be considered.

[e]During 2004, the transit system carried about 41 total passengers per revenue vehicle hour systemwide on all services and the regular routes operated on an average weekday carried about 35 total passengers per revenue vehicle hour.

Source: SEWRPC.

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Milwaukee County Transit System
Interoffice Memorandum

TO: File

FROM: Natalie Marshall – Transit Planner

SUBJECT: 2023 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

DATE: January 31st, 2024

Every year, planning staff compare the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the "Level of Service Methodology" section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2023 schedule period.

For the purpose of assessing compliance with Title VI, a census tract is considered "minority" if the concentration of non-white and non-Hispanic residents in that tract exceeds the countywide percentage. According to the 2022 American Community Survey 1-year estimates, 51.5% of Milwaukee County residents are not white and not Hispanic. Census tracts with a percentage of minority residents less than 51.5% were identified as a non-minority tract. Each MCTS bus route was identified as primarily serving:

- Minority areas
  - If > 33.3% of the route mileage operated within minority tracts
- Non-Minority areas.
  - If < 33.3% of the route mileage operated within minority tracts

In 2023, MCTS operated 27 fixed routes in minority areas and 10 fixed routes in non-minority areas (see Appendix A). Shuttle service and school trippers were not included in this Title VI analysis.

Service Standards

Vehicle Load - Average maximum loads during the morning and afternoon peak periods were calculated for each route (see Appendix B). All fixed routes are well below the standard of a 1.3 ratio between passengers and seats. The highest maximum loads were on minority routes; however, these load factors were still well below the standard.

Vehicle Headways – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority areas are better than the headways on routes that serve non-minority areas (Appendix C).

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On Time Performance - All operators are required to meet an on-time performance standard of being between two minutes early and five minutes late at a time point. MCTS has a system-wide standard of 90% on time. Data from 2023 shows that on-time performance averaged 78% over the year (see Appendix D).

Distribution of Transit Amenities – The supply and demand for transit service is measured according to the number of passengers per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see Appendix E). While the passengers per bus hour is higher on routes that serve minority populations, the greater number of bus hours allocated to these routes shows that service hours are being allocated appropriately.

The distribution of bus shelters is based on a scoring system that rates several factors, e.g., daily ridership at the bus stop, if the stop is at a transfer corner, and the level of exposure to the weather at the stop. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population. In 2023, roughly 53% of MCTS shelters were in census tracts identified as predominantly minority. (*Update when Bus Stop Amenity project is complete*.)

Route guides and timetables are extensively distributed throughout the community. An entire set of all route guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them and may also access schedule information via a mobile phone or the internet.

Passengers can pay fares with a WisGO card, through the UMO app, or with cash. WisGO cards are available at hundreds of retailers throughout the county including grocery stores, gas stations, and banks/credit unions. Just over half of these retailers are located in minority census tracts.

Service Availability – The span of service, i.e., the number of hours per day that a route is in service, is equitable between minority and non-minority areas (see Appendix F). No minority routes are in service for less than 15 hours on weekdays. The average service span for minority routes was 21 hours, while non-minority was 20 hours.

Service Policies

Vehicle Assignment – MCTS currently operates a fleet of 344 buses (see Appendix G). Over half of the fleet is comprised of 40-foot standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning. Since 2019, over 100 Gillig coaches have been added to the fleet with similar amenities as the New Flyer buses. In 2023, MCTS put 11 battery-electric buses manufactured by Nova into service, all of which are reserved for use on the Connect 1 Bus Rapid Transit line. These buses are also 40 feet with two doors, standard seating, heating, and air conditioning. Several Gillig buses are reserved for the Connect 1 route as well (see table). The remainder of Gillig and New Flyer buses are available for use on any route and are assigned in no particular order.

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Transit Security – The Director of Safety, Security and Project Management and the Safety and Security Manager work in collaboration to coordinate all security and emergency related functions for MCTS and ensure its compliance with all local, state, and federal security guidelines. Meetings are held regularly with local law enforcement and emergency management leaders to foster strong communication and collaborative relationships.

Response to incidents and patrolling of MCTS property and bus routes is provided by Allied Universal Security Services, a private security firm contracted by MTS. Allied Universal employs over 40 full and part-time transit security officers and provides on-site management of more than 2,100 hours of weekly service. Transit Security officers are available to respond to transit incidents 24/7/365. With direction from the Safety and Security Manager, Transit Security managers assign priority for bus riding to the routes and times of day where MCTS and local crime data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are analyzed monthly to aid the security team in the development of sound security deployment strategies.

The Safety, Security and Project Management Department along with representatives from the Transportation Department leadership meet monthly with representatives from the operator's union, and transit security to address and discuss security issues. These meetings have been an extremely effective mechanism to ensure quality communication between bus operators and the security team.

To deter and detect criminal activity, MCTS uses a 10-camera system with a 4-terabyte hard drive that will store weeks of video on board the bus. This system, provided by Luminator Technology, has 4 cameras that view the exterior of the bus on all sides and 6 high-definition, infrared cameras on the interior of the bus that record audio and video whenever the bus is in service. MCTS staff can request video from any bus in the fleet through a software interface and the video automatically downloads to a central server once the bus pulls into the station. This system has been an excellent addition to the transit security, customer service and risk management programs.

In partnership with the Milwaukee Police Department, MCTS has installed over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but MCTS can request video from these cameras at any time.

The Safety, Security and Project Management Department trains all new operators in safe passenger interaction techniques, conflict communication skills and emergency response to an active shooter. During this 4-hour class, the TSA also presents to operators their First Observer Plus program on suspicious activity recognition and reporting.

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Appendix A: 2023 Minority and Non-Minority Routes

Table 1: Minority Routes

Route	Name
BLU	Fond du Lac - Mill
PUR	27th Street
RED	Capitol Drive
11	Hampton Avenue
12	Teutonia Avenue
18	National - Greenfield
19	Dr. M.L.K - S. 13th
20	S. 20th Street
21	North Avenue
22	Center Street
24	Forest Home - 16th
30	Sherman - Wisconsin
31	State - Highland
33	Vliet -84th
34	Hopkins - Congress
35	35th Street
53	Lincoln Avenue
54	Mitchell - Burnham
57	Walnut -Lisbon
58	Villard Avenue
60	60th Street
63	Silver Spring-Pt. Washington
66	Burleigh Street
76	76th Street
80	6th - Green Bay
88	Brown Deer
92	92nd Street

Table 2: Non-minority Routes

Route	Name
CN1	Connect 1 - Wisconsin
GRE	Oakland-Howell
14	Humboldt
15	Holton - Kinnickinnic
28	108th Street
51	Oklahoma Avenue
52	Clement-Pennsylvania
55	Layton Avenue
56	Greenfield - 43rd
68	Port Washington

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Appendix B: 2023 Average Maximum Loads

Table 1: Minority Routes

Route	Name	AM Load	PM Load
BLU	Fond du Lac - Mill	22	24
PUR	27th Street	26	39
RED	Capitol Drive	22	29
11	Hampton Avenue	11	13
12	Teutonia Avenue	16	23
18	National - Greenfield	21	30
19	Dr. M.L.K - S. 13th	23	24
20	S. 20th Street	29	12
21	North Avenue	16	19
22	Center Street	17	25
24	Forest Home - 16th	14	17
30	Sherman - Wisconsin	31	34
31	State - Highland	13	24
33	Vliet -84th	11	11
34	Hopkins - Congress	12	12
35	35th Street	19	21
53	Lincoln Avenue	17	23
54	Mitchell - Burnham	17	16
57	Walnut -Lisbon	24	22
58	Villard Avenue	13	10
60	60th Street	30	36
63	Silver Spring-Pt. Washington	17	18
66	Burleigh Street	18	23
76	76th Street	23	28
80	6th - Green Bay	21	21
88	Brown Deer	13	14
92	92nd Street	18	26
	Group Average	**19**	**22**

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Table 2: Non-Minority Routes

CN1	Connect 1 – Wisconsin Ave	20	23
GRE	Oakland-Howell	22	29
14	Forest Home/Humboldt	13	14
15	Holton - Kinnickinnic	22	35
28	108th Street	11	14
51	Oklahoma Avenue	21	28
52	Clement-Pennsylvania	8	7
55	Layton Avenue	13	25
56	Greenfield - 43rd	9	13
68	Port Washington	6	6
	Group Average	**15**	**19**

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Appendix C: 2023 Average Headways

Table 1: Weekday Average Headways

Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Minority		6a-9a	9a-3p	3p-6p	6-9:30p	9:30 - XX
BLU	Fond du Lac - Mill	15	15	15	33	33
PUR	27th Street	13	11	13	19	20
RED	Capitol Drive	11	12	12	16	21
11	Hampton Avenue	30	30	31	28	28
12	Teutonia Avenue	15	15	16	25	34
18	National - Greenfield	15	14	15	20	31
19	Dr. M.L.K - S. 13th	14	15	15	20	27
20	S. 20th Street	39	40	39	38	N/A
21	North Avenue	13	14	14	20	25
22	Center Street	25	22	27	35	32
24	Forest Home - 16th	21	23	24	29	28
30	Sherman - Wisconsin	13	10	14	16	20
31	State - Highland	29	29	31	31	40
33	Vliet -84th	42	43	45	37	37
34	Hopkins - Congress	32	32	33	31	31
35	35th Street	15	15	15	24	25
53	Lincoln Avenue	20	20	21	30	38
54	Mitchell - Burnham	29	29	30	30	36
57	Walnut -Lisbon	28	29	31	38	36
58	Villard Avenue	32	34	34	32	30
60	60th Street	20	20	20	30	29
63	Silver Spring-Pt. Washington	23	23	22	30	30
66	Burleigh Street	16	18	18	27	32
76	76th Street	15	15	15	33	33
80	6th - Green Bay	15	14	14	21	26
88	Brown Deer	38	39	39	36	36
92	92nd Street					
	Group Average	**22**	**22**	**23**	**28**	**30**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 Wisconsin Ave	10	10	10	17	20
GRE	Oakland-Howell	14	14	15	19	27
14	Humboldt	15	16	16	25	23
15	Holton - Kinnickinnic	15	15	15	23	30
28	108th Street	40	40	41	39	55
51	Oklahoma Avenue	14	15	15	20	27
52	Clement-Pennsylvania	55	55	50	50	N/A
55	Layton Avenue	33	34	34	32	43
56	Greenfield - 43rd	26	28	28	37	34
68	Port Washington	28	30	30	N/A	N/A
	Group Average	**25**	**26**	**25**	**29**	**32**

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Table 2: Saturday Headways

Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Minority						
BLU	Fond du Lac - Mill	19	19	20	31	31
PUR	27th Street	18	15	15	19	23
RED	Capitol Drive	16	16	15	19	24
11	Hampton Avenue	29	30	30	27	26
12	Teutonia Avenue	21	21	21	26	32
18	National - Greenfield	20	22	22	24	31
19	Dr. M.L.K - S. 13th	20	20	20	30	31
20	S. 20th Street	74	38	38	37	N/A
21	North Avenue	20	18	18	24	24
22	Center Street	31	26	26	32	30
24	Forest Home - 16th	21	22	23	26	27
30	Sherman - Wisconsin	15	15	15	17	21
31	State - Highland	27	27	27	38	38
33	Vliet -84th	42	42	38	38	39
34	Hopkins - Congress	31	31	32	31	44
35	35th Street	19	20	19	25	31
53	Lincoln Avenue	38	27	27	38	38
54	Mitchell - Burnham	36	36	36	35	35
57	Walnut -Lisbon	34	28	29	30	40
58	Villard Avenue	31	32	32	28	28
60	60th Street	26	26	28	30	29
63	Silver Spring-Pt. Washington	31	23	23	31	31
66	Burleigh Street	20	21	21	25	37
76	76th Street	24	24	24	32	37
80	6th - Green Bay	20	21	21	28	27
88	Brown Deer	38	39	35	35	34
92	92nd Street	47	47	47	46	46
	Group Average	**28**	**26**	**26**	**30**	**32**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 - Wisconsin Ave	15	15	15	20	30
GRE	Oakland-Howell	20	20	20	18	27
14	Humboldt	25	25	25	25	34
15	Holton - Kinnickinnic	20	21	20	20	25
28	108th Street	37	40	48	52	52
51	Oklahoma Avenue	20	21	21	26	38
52	Clement-Pennsylvania	48	48	45	45	N/A
55	Layton Avenue	29	29	30	28	36
56	Greenfield - 43rd	34	26	26	33	32
68	Port Washington	27	27	27	27	N/A
	Group Average	**29**	**29**	**29**	**30**	**35**

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Table 3: Sunday Headways

Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Minority						
BLU	Fond du Lac - Mill	26	25	26	30	29
PUR	27th Street	21	17	16	17	25
RED	Capitol Drive	23	17	18	20	22
11	Hampton Avenue	29	29	29	27	26
12	Teutonia Avenue	25	26	26	33	33
18	National - Greenfield	23	25	25	23	31
19	Dr. M.L.K - S. 13th	31	23	23	33	38
20	S. 20th Street	71	37	37	37	N/A
21	North Avenue	30	20	21	26	31
22	Center Street	30	34	34	32	30
24	Forest Home - 16th	27	29	29	37	37
30	Sherman - Wisconsin	20	14	15	19	28
31	State - Highland	37	27	26	37	38
33	Vliet -84th	40	40	39	37	37
34	Hopkins - Congress	28	31	31	30	42
35	35th Street	24	26	26	30	37
53	Lincoln Avenue	35	38	38	36	36
54	Mitchell - Burnham	34	35	35	36	51
57	Walnut -Lisbon	33	37	37	35	35
58	Villard Avenue	28	30	30	28	28
60	60th Street	27	29	30	34	34
63	Silver Spring-Pt. Washington	30	33	32	31	30
66	Burleigh Street	25	20	20	26	38
76	76th Street	25	27	27	38	37
80	6th - Green Bay	28	24	24	28	27
88	Brown Deer	34	38	38	34	34
92	92nd Street	44	45	47	46	46
	Group Average	**31**	**29**	**29**	**31**	**34**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 - Wisconsin Ave	20	15	15	20	30
GRE	Oakland-Howell	24	24	24	27	36
14	Humboldt	34	24	24	34	32
15	Holton - Kinnickinnic	24	24	23	31	31
28	108th Street	54	38	43	52	N/A
51	Oklahoma Avenue	25	27	26	37	37
52	Clement-Pennsylvania	47	47	44	44	N/A
55	Layton Avenue	41	28	28	38	38
56	Greenfield - 43rd	31	37	37	32	32
68	Port Washington	54	32	28	26	N/A
	Group Average	**37**	**31**	**31**	**36**	**34**

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Appendix D: 2023 On-Time Performance

Table 1: Average OTP in 2023

Minority	
Route	Average OTP
11 - Hampton Avenue	79.3%
12 - Teutonia Avenue	75.1%
18 - National-Greenfield	82.5%
19 - Dr. MLK Jr. Drive-S. 13th	69.9%
20 - S. 20th Street	64.2%
21 - North Avenue	73.1%
22 - Center Street	80.3%
24 - Forest Home - 16th	74.4%
30 - Sherman-Wisconsin	78.2%
31 - State-Highland	77.6%
33 - Vliet-84th	75.3%
34 - Hopkins-Congress GIANNIS LINE	78.8%
35 - 35th Street	81.0%
53 - Lincoln Avenue	87.9%
54 - Mitchell-Burnham	84.1%
57 - Walnut-Appleton	76.0%
58 - Villard Avenue	81.5%
60 - 60th Street	83.1%
63 - Silver Spring Drive	79.8%
66 - Burleigh Street	82.6%
76 - 76th Street	78.1%
80 - 6th Street	79.9%
88 - Brown Deer Road	83.0%
92 - 92nd Street	77.5%
BLU - BlueLine Fond du Lac-Mill	78.7%
PUR - PurpleLine 27th Street	75.0%
RED - RedLine Capitol Drive	79.9%
Group Average	**78.4%**
Non-minority	
14 - Humboldt	71.3%
14 - Humboldt Boulevard	87.4%
14 - Humboldt-Forest Home	79.2%

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15 - Holton-Kinnickinnic	84.0%
28 - 108th Street	79.0%
51 - Oklahoma Avenue	90.0%
52 - Clement-Pennsylvania	71.4%
55 - Layton Avenue	88.6%
56 - Greenfield-S. 43rd	84.9%
68 - Port Washington Road	51.0%
CN1 - CONNECT 1 BRT	63.0%
CN1 - CONNECT 1 Wisconsin Ave BRT	78.1%
GOL - GoldLine Wisconsin Avenue-UWM	72.7%
GRE - GreenLine Bayshore-Airport	78.0%
Group Average	**77.0%**

Table 2: Average OTP by month (all fixed routes)

Month	Average OTP
January	81.0
February	79.7
March	80.2
April	79.1
May	77.3
June	77.0
July	71.7
August	76.7
September	75.5
October	77.8
November	79.3
December	82.0
Total	**78.1**

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Appendix E: Ridership, Bus Hours, and Passengers per Bus Hour (PBH)

Route	Name	Type of Route	Avg. Ridership	Bus Hours	PBH
Minority					
BLU	Fond du Lac - Mill	Regular	2550	138	18
PUR	27th Street	Regular	5881	232	25
RED	Capitol Drive	Regular	5553	175	32
11	Hampton Avenue	Regular	702	39	18
12	Teutonia Avenue	Regular	2326	116	20
18	National - Greenfield	Regular	3227	134	24
19	Dr. M.L.K - S. 13th	Regular	3799	188	20
20	S. 20th Street	Regular	385	29	13
21	North Avenue	Regular	3008	134	22
22	Center Street	Regular	1527	79	19
24	Forest Home - 16th	Regular	1527	71	22
30	Sherman - Wisconsin	Regular	7297	248	29
31	State - Highland	Regular	873	51	17
33	Vliet -84th	Regular	420	36	12
34	Hopkins - Congress	Regular	746	57	13
35	35th Street	Regular	3087	161	19
53	Lincoln Avenue	Regular	1308	69.0	19
54	Mitchell - Burnham	Regular	1406	74	19
57	Walnut -Lisbon	Regular	1396	74	19
58	Villard Avenue	Regular	546	39	14
60	60th Street	Regular	2260	140	16
63	Silver Spring-Pt. Washington	Regular	1219	53	23
66	Burleigh Street	Regular	2039	100	20
76	76th Street	Regular	3151	185	17
80	6th - Green Bay	Regular	3026	192	16
88	Brown Deer	Regular	589	38	16
92	92nd Street	Regular	1078	77	14
		Group Average	**2257**	**108**	**19**

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Route	Name	Type of Route	Avg. Ridership	Bus Hours	PBH
Non-Minority					
CN1	Wisconsin	Regular	3487	143	24
GRE	Oakland-Howell	Regular	4403	195	23
14	Humboldt	Regular	998	81	12
15	Holton - Kinnickinnic	Regular	3226	169	19
28	108th Street	Regular	758	54	14
51	Oklahoma Avenue	Regular	1890	99	19
52	Clement-Pennsylvania	Regular	153	15.0	10
55	Layton Avenue	Regular	835	52.0	16
56	Greenfield - 43rd	Regular	894	52.0	17
68	Port Washington	Regular	276	27	10
		Group Average	**1692**	**89**	**17**

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Appendix F: 2023 Service Hours

Route	Name	Type of Route	Hours of Day
Minority			
BLU	Fond du Lac - Mill	Regular	22
PUR	27th Street	Regular	22
RED	Capitol Drive	Regular	21
11	Hampton Avenue	Regular	19
12	Teutonia Avenue	Regular	21
18	National - Greenfield	Regular	22
19	Dr. M.L.K - S. 13th	Regular	22
20	S. 20th Street	Regular	15
21	North Avenue	Regular	22
22	Center Street	Regular	20
24	Forest Home - 16th	Regular	20
30	Sherman - Wisconsin	Regular	22
31	State - Highland	Regular	19
33	Vliet -84th	Regular	18
34	Hopkins - Congress	Regular	20
35	35th Street	Regular	22
53	Lincoln Avenue	Regular	20
54	Mitchell - Burnham	Regular	20
57	Walnut -Lisbon	Regular	21
58	Villard Avenue	Regular	20
60	60th Street	Regular	20
63	Silver Spring-Pt. Washington	Regular	21
66	Burleigh Street	Regular	21
76	76th Street	Regular	21
80	6th - Green Bay	Regular	22
88	Brown Deer	Regular	20
92	92nd Street	Regular	21
		Group Average	**21**

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Route	Name	Type of Route	Hours of Day
Non-Minority			
CN1	Wisconsin	Regular	21
GRE	Oakland-Howell	Regular	24
14	Humboldt	Regular	20
15	Holton - Kinnickinnic	Regular	23
28	108th Street	Regular	20
51	Oklahoma Avenue	Regular	20
52	Clement-Pennsylvania	Regular	15
55	Layton Avenue	Regular	19
56	Greenfield - 43rd	Regular	20
68	Port Washington	Regular	14
		Group Average	**20**

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Appendix G: 2023 Bus Counts

		2010	2011	2012	2013	2014	2015	2016	2017	2019	2020	2021	2022	2022
		New Flyer	New Flyer	New Flyer	New Flyer	New Flyer	New Flyer	New Flyer	New Flyer	Gillig	Gillig	Gillig	Gillig	Nova
Training Buses	Fond du Lac Garage		5211	5302-5303		5500-5534		5700-5719	5800-5814	5900-5927		6100-6113	6200-6229	
			5217	5305										
			5220	5307-5308										
CN1 Buses			5224	5310										
			5228-5230	5313-5314										
			5233	5317-5319										
				5323										
				5325-5328										
				5330-5331										
				5352										
	178	**0**	**8**	**28**	**0**	**35**	**0**	**20**	**15**	**28**	**0**	**14**	**30**	**0**
	Kinnickinnic Garage	5119		5304	5400-5454		5600-5627	5720-5729			6000-6014		6230-6238	1000-1010
		5133		5349							6016-6022		6240-6248	
		5159		5354									6250	
		5163											6239	
		5168											6249	
		5172											6251-6258	
		5183												
		5189												
	166	**8**	**0**	**3**	**55**	**0**	**28**	**10**	**0**	**0**	**22**	**0**	**29**	**11**
Total Active Buses	**342**	**8**	**8**	**31**	**55**	**35**	**28**	**30**	**15**	**28**	**22**	**14**	**59**	**11**

	5100-5189	**2010**	**8**	40' / 39			OUT OF SERVICE:							
	5200-5234	**2011**	**8**	40' / 39				5101, 5129						
	5300-5354	**2012**	**31**	40' / 39				5200, 5206, 5207, 5209, 5214, 5222, 5226, 5306, 5309						
	5400-5454	**2013**	**55**	40' / 39				5312, 5316, 5322, 5324, 5329, 5332, 5335, 5338, 5343						
	5500-5534	**2014**	**35**	40' / 39				5347, 5348						
	5600-5627	**2015**	**28**	40' / 35										
	5700-5729	**2016**	**30**	40' / 36		Total Active Buses		344						
	5800-5814	**2017**	**15**	40' / 36		Out of Service Buses		24						
	5900-5927	**2019**	**28**	40' / 36		**Grand Total**		**368**						
	6000-6022	**2020**	**22**	40' / 36										
	6100-6113	**2021**	**14**	40' / 36		**Average Age as of 2023**	**6.41**							
	6200-6229	**2022**	**30**	40' / 36										
	6230-6258	**2022**	**29**	40' / 36										
	1000-10013	**2022**	**11**	40' / 32										
			344											

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Milwaukee County Transit System
Interoffice Memorandum

TO: File

FROM: Natalie Marshall – Transit Planner

SUBJECT: 2024 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

DATE: January 31st, 2025

Every year, planning staff compare the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the "Level of Service Methodology" section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2024 schedule period.

For the purpose of assessing compliance with Title VI, a census tract is considered "minority" if the percent of non-white and/or Hispanic residents in that tract exceeds the countywide percentage. According to the 2023 American Community Survey 5-year estimates, 52.2% of Milwaukee County residents are not white and/or Hispanic. Census tracts with a percentage of minority residents less than 52.2% were identified as a non-minority tract. Each MCTS bus route was identified as primarily serving:

- Minority areas
  - If > 33.3% of the route mileage operated within minority tracts
- Non-Minority areas.
  - If < 33.3% of the route mileage operated within minority tracts

In 2024, MCTS operated 28 fixed routes in minority areas and 9 fixed routes in non-minority areas (see Appendix A). Shuttle service and school trippers were not included in this Title VI analysis.

Service Standards

Vehicle Load - Average maximum loads during the morning and afternoon peak periods were calculated for each route (see Appendix B). All fixed routes are below the standard of a 1.3 ratio between passengers and seats. The highest maximum loads were on minority routes; however, these load factors were still well below the standard.

Vehicle Headways – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority areas are better than the headways on routes that serve non-minority areas (Appendix C).

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On Time Performance - All operators are required to meet an on-time performance standard of being between two minutes early and five minutes late at a time point. MCTS has a system-wide standard of 90% on time. Data from 2024 shows that on-time performance averaged 78% over the year (see Appendix D). Minority and non-minority routes had almost exactly the same OTP (79% and 80%, respectively).

Passengers per Bus Hour – The supply and demand for transit service is measured according to the number of passengers per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see Appendix E). While the passengers per bus hour is higher on routes that serve minority populations, the greater number of bus hours allocated to these routes shows that service hours are being allocated appropriately.

Distribution of Transit Amenities - The distribution of bus shelters is based on a scoring system that rates several factors such as daily ridership at the bus stop, if the stop is at a transfer corner, the level of exposure to the weather at the stop, and the demographics of the surrounding area. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population. In 2024, 55% of MCTS shelters were in census tracts identified as predominantly minority.

Route guides and timetables are distributed throughout the community. An entire set of all route guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them and may also access schedule information via mobile phone applications or MCTS's website.

Passengers can pay fares with a WisGO card, through the UMO app, or with cash. WisGO cards are available at hundreds of retailers throughout the county including grocery stores, gas stations, and banks/credit unions. Just over half of these retailers are located in minority census tracts.

Service Availability – The span of service, i.e., the number of hours per day that a route is in service, is equitable between minority and non-minority areas (see Appendix F). No minority routes are in service for less than 15 hours on weekdays. The average service span for minority routes was 20 hours, and non-minority was 20 hours.

Service Policies

Vehicle Assignment – MCTS currently operates a fleet of 363 buses (see Appendix G). Just over half of the fleet is comprised of 40-foot standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning. Over 100 Gillig coaches are part of the fleet with similar amenities as the New Flyer buses. MCTS also operates 14 battery-electric buses manufactured by Nova, all of which are reserved for use on the Connect 1 Bus Rapid Transit line. These buses are also 40 feet with two doors, standard seating, heating, and air conditioning. Several Gillig buses are reserved for the Connect 1 route as well (see Appendix G). The remainder of Gillig and New Flyer buses are available for use on any route and are assigned in no particular order.

Transit Security – The Director of Safety, Security and Project Management and the Safety and Security Manager work in collaboration to coordinate all security and emergency related functions for MCTS and ensure its compliance with all local, state, and federal security guidelines. Meetings are held regularly with local law

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enforcement and emergency management leaders to foster strong communication and collaborative relationships.

Response to incidents and patrolling of MCTS property and bus routes is provided in part by Allied Universal Security Services, a private security firm contracted by MTS. MCTS has also recently began building an in-house Public Safety program which currently employes two supervisors and ten public safety officers. The program will continue to grow during 2025 with the addition of more officers and a Public Safety Manager position. Transit Security officers, whether in-house or contracted, are available to respond to transit incidents 24/7/365. With direction from the Safety and Security Manager, Transit Security managers assign priority for bus riding to the routes and times of day where MCTS and local crime data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are analyzed monthly to aid the security team in the development of sound security deployment strategies.

The Safety, Security and Project Management Department along with representatives from the Transportation Department leadership meet monthly with representatives from the operator's union, and transit security to address and discuss security issues. These meetings have been an extremely effective mechanism to ensure quality communication between bus operators and the security team.

To deter and detect criminal activity, MCTS uses a 10-camera system with a 4-terabyte hard drive that will store weeks of video on board the bus. This system, provided by Luminator Technology, has 4 cameras that view the exterior of the bus on all sides and 6 high-definition, infrared cameras on the interior of the bus that record audio and video whenever the bus is in service. MCTS staff can request video from any bus in the fleet through a software interface and the video automatically downloads to a central server once the bus pulls into the station. The system also has live look capabilities, as well as the option to download video via cellular connection in the event of an emergency situation. This system has been an excellent addition to the transit security, customer service and risk management programs.

In partnership with the Milwaukee Police Department, MCTS has installed over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but MCTS can request video from these cameras at any time.

The Safety, Security and Project Management Department trains all new operators in safe passenger interaction techniques, conflict communication skills and emergency response to an active shooter. During this 4-hour class, the TSA also presents to operators their First Observer Plus program on suspicious activity recognition and reporting.

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Appendix A: 2024 Minority and Non-Minority Routes

Table 1: Minority Routes

Route	Name
BLU	Fond du Lac - Mill
PUR	27th Street
RED	Capitol Drive
11	Hampton Avenue
12	Teutonia Avenue
18	National - Greenfield
19	Dr. M.L.K - S. 13th
20	S. 20th Street
21	North Avenue
22	Center Street
24	Forest Home - 16th
30	Sherman - Wisconsin
33	Vliet -84th
34	Hopkins - Congress
35	35th Street
51	Oklahoma Avenue
53	Lincoln Avenue
54	Mitchell - Burnham
56	Greenfield - 43rd
57	Walnut -Lisbon
58	Villard Avenue
60	60th Street
63	Silver Spring-Pt. Washington
66	Burleigh Street
76	76th Street
80	6th - Green Bay
88	Brown Deer
92	92nd Street

Table 2: Non-minority Routes

Route	Name
CN1	Connect 1 - Wisconsin
GRE	Oakland-Howell
14	Humboldt
15	Holton - Kinnickinnic
28	108th Street
31	State - Highland
52	Clement-Pennsylvania
55	Layton Avenue
68	Port Washington

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Appendix B: 2024 Average Maximum Loads

Table 1: Average Maximum Loads on Minority Routes

Route	Name	AM Load	PM Load
BLU	Fond du Lac - Mill	27	29
PUR	27th Street	30	36
RED	Capitol Drive	25	32
11	Hampton Avenue	9	11
12	Teutonia Avenue	20	22
18	National - Greenfield	23	24
19	Dr. M.L.K - S. 13th	27	25
20	S. 20th Street	29	25
21	North Avenue	25	27
22	Center Street	19	23
24	Forest Home - 16th	17	20
30	Sherman - Wisconsin	29	33
33	Vliet -84th	11	11
34	Hopkins - Congress	15	15
35	35th Street	20	25
51	Oklahoma Avenue	20	33
53	Lincoln Avenue	14	26
54	Mitchell - Burnham	14	22
56	Greenfield - 43rd	9	15
57	Walnut -Lisbon	27	30
58	Villard Avenue	10	10
60	60th Street	24	35
63	Silver Spring-Pt. Washington	14	18
66	Burleigh Street	18	25
76	76th Street	22	26
80	6th - Green Bay	19	26
88	Brown Deer	12	11
92	92nd Street	19	22
	Group Average	**20**	**23**

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Table 2: Average Maximum Loads on Non-Minority Routes

Route	Name	AM Load	PM Load
CN1	Connect 1 - Wisconsin Ave	20	20
GRE	Oakland-Howell	24	31
14	Forest Home/Humboldt	11	12
15	Holton - Kinnickinnic	23	32
28	108th Street	11	13
31	State - Highland	15	25
52	Clement-Pennsylvania	6	7
55	Layton Avenue	12	23
68	Port Washington	6	6
	Group Average	**14**	**19**

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Appendix C: 2024 Average Headways

Table 1: Weekday Average Headways

Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Minority		6a-9a	9a-3p	3p-6p	6-9:30p	9:30 - XX
BLU	Fond du Lac - Mill	15	15	15	33	33
PUR	27th Street	13	12	13	18	20
RED	Capitol Drive	11	12	12	16	21
11	Hampton Avenue	32	32	34	30	30
12	Teutonia Avenue	15	15	16	25	34
18	National - Greenfield	15	15	15	20	34
19	Dr. M.L.K - S. 13th	14	15	15	19	27
20	S. 20th Street	39	40	40	38	N/A
21	North Avenue	13	14	14	25	23
22	Center Street	22	27	23	25	30
24	Forest Home - 16th	23	20	25	30	29
30	Sherman - Wisconsin	10	10	11	15	21
33	Vliet -84th	30	43	32	32	40
34	Hopkins - Congress	31	33	32	33	28
35	35th Street	15	15	14	22	25
51	Oklahoma Avenue	14	15	15	20	27
53	Lincoln Avenue	20	20	23	28	38
54	Mitchell - Burnham	30	32	31	31	38
56	Greenfield - 43rd	26	28	28	37	34
57	Walnut -Lisbon	28	29	31	38	36
58	Villard Avenue	32	34	34	32	30
60	60th Street	21	20	20	30	29
63	Silver Spring-Pt. Washington	23	23	22	30	30
66	Burleigh Street	16	18	18	27	32
76	76th Street	15	15	13	33	37
80	6th - Green Bay	15	14	14	21	26
88	Brown Deer	38	39	39	36	36
92	92nd Street	32	33	34	40	47
	Group Average	**22**	**23**	**23**	**28**	**31**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 Wisconsin Ave	10	10	10	17	25
GRE	Oakland-Howell	14	14	15	19	27
14	Humboldt	15	16	16	25	23
15	Holton - Kinnickinnic	15	15	15	23	30
28	108th Street	30	35	41	38	55
31	State - Highland	30	30	32	30	30
52	Clement-Pennsylvania	55	55	50	50	N/A
55	Layton Avenue	33	34	34	32	43
68	Port Washington	28	30	30	32	N/A
	Group Average	**26**	**27**	**27**	**30**	**33**

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Table 2: Saturday Headways

Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Minority						
BLU	Fond du Lac - Mill	19	19	20	31	31
PUR	27th Street	18	15	15	19	23
RED	Capitol Drive	16	16	15	19	24
11	Hampton Avenue	29	30	30	27	26
12	Teutonia Avenue	21	21	21	26	32
18	National - Greenfield	20	22	22	24	31
19	Dr. M.L.K - S. 13th	20	20	20	30	31
20	S. 20th Street	74	38	38	37	N/A
21	North Avenue	17	20	20	24	28
22	Center Street	31	26	26	32	30
24	Forest Home - 16th	21	22	23	26	27
30	Sherman - Wisconsin	13	12	13	14	23
33	Vliet -84th	42	42	38	38	39
34	Hopkins - Congress	31	31	32	31	44
35	35th Street	19	20	19	25	31
51	Oklahoma Avenue	20	21	21	26	38
53	Lincoln Avenue	38	27	27	38	38
54	Mitchell - Burnham	31	30	36	35	35
56	Greenfield - 43rd	34	26	26	33	32
57	Walnut -Lisbon	34	28	29	30	40
58	Villard Avenue	31	32	32	28	28
60	60th Street	26	26	28	30	29
63	Silver Spring-Pt. Washington	31	23	23	31	31
66	Burleigh Street	20	21	21	25	37
76	76th Street	24	24	24	32	37
80	6th - Green Bay	20	21	21	28	27
88	Brown Deer	38	39	35	35	34
92	92nd Street	37	37	38	46	46
	Group Average	**28**	**25**	**25**	**29**	**32**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 - Wisconsin Ave	10	15	15	20	30
GRE	Oakland-Howell	20	20	20	18	27
14	Humboldt	25	25	25	25	34
15	Holton - Kinnickinnic	20	21	20	20	25
28	108th Street	30	40	42	41	52
31	State - Highland	27	27	27	38	38
52	Clement-Pennsylvania	48	48	45	45	N/A
55	Layton Avenue	29	29	30	28	36
68	Port Washington	27	27	27	27	N/A
	Group Average	**26**	**28**	**28**	**29**	**35**

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Table 3: Sunday Headways

Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Minority						
BLU	Fond du Lac - Mill	26	25	26	30	29
PUR	27th Street	21	17	16	17	25
RED	Capitol Drive	23	17	18	20	22
11	Hampton Avenue	29	29	29	27	26
12	Teutonia Avenue	25	26	26	33	33
18	National - Greenfield	23	25	25	23	31
19	Dr. M.L.K - S. 13th	31	23	23	33	38
20	S. 20th Street	71	37	37	37	N/A
21	North Avenue	30	20	21	26	31
22	Center Street	30	34	34	32	30
24	Forest Home - 16th	27	29	29	37	37
30	Sherman - Wisconsin	20	14	15	19	28
33	Vliet -84th	40	40	39	37	37
34	Hopkins - Congress	28	31	31	30	42
35	35th Street	24	26	26	30	37
51	Oklahoma Avenue	25	27	26	37	37
53	Lincoln Avenue	35	38	38	36	36
54	Mitchell - Burnham	34	35	35	36	51
56	Greenfield - 43rd	31	37	37	32	32
57	Walnut -Lisbon	33	37	37	35	35
58	Villard Avenue	28	30	30	28	28
60	60th Street	27	29	30	34	34
63	Silver Spring-Pt. Washington	30	33	32	31	30
66	Burleigh Street	25	20	20	26	38
76	76th Street	25	27	27	38	37
80	6th - Green Bay	28	24	24	28	27
88	Brown Deer	34	38	38	34	34
92	92nd Street	44	45	47	46	46
	Group Average	**30**	**29**	**29**	**31**	**34**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 - Wisconsin Ave	20	15	15	20	30
GRE	Oakland-Howell	24	24	24	27	36
14	Humboldt	34	24	24	34	32
15	Holton - Kinnickinnic	24	24	23	31	31
28	108th Street	54	38	43	52	N/A
31	State - Highland	37	27	26	37	38
52	Clement-Pennsylvania	47	47	44	44	N/A
55	Layton Avenue	41	28	28	38	38
68	Port Washington	54	32	28	26	N/A
	Group Average	**37**	**29**	**28**	**34**	**34**

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Appendix D: 2024 On-Time Performance

Table 1: Average OTP in 2024

Minority	
Route	Average OTP
11 - Hampton Avenue	80.60%
12 - Teutonia Avenue	76.30%
19 - Dr. MLK Jr. Drive-S. 13th	69.20%
21 - North Avenue	78.90%
22 - Center Street	75.30%
24 - Forest Home - 16th	70.90%
30 - Sherman-Wisconsin	65.10%
33 - Vliet-84th	81.40%
34 - Hopkins-Congress GIANNIS LINE	72.80%
35 - 35th Street	76.60%
51 - Oklahoma Avenue	90.50%
53 - Lincoln Avenue	87.90%
54 - Mitchell-Burnham	86.00%
56 - Greenfield-S. 43rd	86.50%
57 - Walnut-Appleton	72.70%
58 - Villard Avenue	87.10%
60 - 60th Street	81.00%
63 - Silver Spring Drive	78.60%
66 - Burleigh Street	76.90%
76 - 76th Street	78.90%
80 - 6th Street	82.50%
88 - Brown Deer Road	85.60%
92 - 92nd Street	76.20%
BLU - BlueLine Fond du Lac-Mill	81.20%
PUR - PurpleLine 27th Street	76.80%
RED - RedLine Capitol Drive	83.50%
Group Average	**79.19%**

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Non-minority	
Route	Average OTP
14 - Humboldt Boulevard	90.00%
15 - Holton-Kinnickinnic	79.00%
28 - 108th Street	79.00%
31 - State-Highland	81.30%
52 - Clement-Pennsylvania	70.50%
CN1 - CONNECT 1 Wisconsin Ave BRT	81.10%
GRE - GreenLine Bayshore-Airport	75.70%
Group Average	**79.51%**

Table 2: Average OTP by month (all fixed routes)

Month	**Average OTP**
January	78.8%
February	66.9%
March	81.0%
April	79.7%
May	78.7%
June	79.7%
July	76.9%
August	77.5%
September	76.5%
October	78.8%
November	79.5%
December	79.4%
Total	**77.8%**

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Appendix E: 2024 Weekday Ridership, Bus Hours, and Passengers per Bus Hour (PBH)

Route	Name	Type of Route	Avg. Ridership	Bus Hours	PBH
Minority					
BLU	Fond du Lac - Mill	Regular	3070	139	22
PUR	27th Street	Regular	6609	230	29
RED	Capitol Drive	Regular	5006	175	29
11	Hampton Avenue	Regular	710	39	18
12	Teutonia Avenue	Regular	2,875	116	25
18	National - Greenfield	Regular	3550	138	26
19	Dr. M.L.K - S. 13th	Regular	4063	188	22
20	S. 20th Street	Regular	452	29	16
21	North Avenue	Regular	3334	135	25
22	Center Street	Regular	1777	80	22
24	Forest Home - 16th	Regular	1851	91	20
30	Sherman - Wisconsin	Regular	8468	260	33
33	Vliet -84th	Regular	571	42	14
34	Hopkins - Congress	Regular	911	57	16
35	35th Street	Regular	3479	161	22
51	Oklahoma Avenue	Regular	2164	98	22
53	Lincoln Avenue	Regular	1395	69.0	20
54	Mitchell - Burnham	Regular	1598	74	22
56	Greenfield - 43rd	Regular	950	51.0	19
57	Walnut -Lisbon	Regular	1710	74	23
58	Villard Avenue	Regular	668	39	17
60	60th Street	Regular	2565	128	20
63	Silver Spring-Pt. Washington	Regular	1530	62	25
66	Burleigh Street	Regular	2458	115	21
76	76th Street	Regular	3708	177	21
80	6th - Green Bay	Regular	3309	183	18
88	Brown Deer	Regular	542	38	14
92	92nd Street	Regular	1357	84	16
		Group Average	**2524**	**110**	**21**

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Route	Name	Type of Route	Avg. Ridership	Bus Hours	PBH
Non-Minority					
CN1	Wisconsin	Regular	3240	143	23
GRE	Oakland-Howell	Regular	4784	196	24
14	Humboldt	Regular	1025	76	13
15	Holton - Kinnickinnic	Regular	3744	169	22
28	108th Street	Regular	892	62	14
31	State - Highland	Regular	1041	54	19
52	Clement-Pennsylvania	Regular	143	15.0	10
55	Layton Avenue	Regular	954	52.0	18
68	Port Washington	Regular	313	27	12
		Group Average	**1793**	**88**	**17**

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Appendix F: 2024 Service Hours

Route	Name	Type of Route	Hours of Day
Minority			
BLU	Fond du Lac - Mill	Regular	22
PUR	27th Street	Regular	22
RED	Capitol Drive	Regular	21
11	Hampton Avenue	Regular	19
12	Teutonia Avenue	Regular	21
18	National - Greenfield	Regular	22
19	Dr. M.L.K - S. 13th	Regular	21
20	S. 20th Street	Regular	15
21	North Avenue	Regular	22
22	Center Street	Regular	20
24	Forest Home - 16th	Regular	20
30	Sherman - Wisconsin	Regular	22
33	Vliet -84th	Regular	18
34	Hopkins - Congress	Regular	20
35	35th Street	Regular	21
51	Oklahoma Avenue	Regular	20
53	Lincoln Avenue	Regular	20
54	Mitchell - Burnham	Regular	20
56	Greenfield - 43rd	Regular	20
57	Walnut -Lisbon	Regular	21
58	Villard Avenue	Regular	20
60	60th Street	Regular	20
63	Silver Spring-Pt. Washington	Regular	20
66	Burleigh Street	Regular	21
76	76th Street	Regular	21
80	6th - Green Bay	Regular	21
88	Brown Deer	Regular	20
92	92nd Street	Regular	21
		Group Average	**20**

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Route	Name	Type of Route	Hours of Day
Non-Minority			
CN1	Wisconsin	Regular	21
GRE	Oakland-Howell	Regular	24
14	Humboldt	Regular	20
15	Holton - Kinnickinnic	Regular	23
28	108th Street	Regular	22
31	State - Highland	Regular	19
52	Clement-Pennsylvania	Regular	15
55	Layton Avenue	Regular	18
68	Port Washington	Regular	14
		Group Average	**20**

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Appendix G: 2024 Bus Counts

	2010 New Flyer	2011 New Flyer	2012 New Flyer	2013 New Flyer	2014 New Flyer	2015 New Flyer	2016 New Flyer	2017 New Flyer	2019 Gillig	2020 Gillig	2021 Gillig	2022 Gillig	2022 Nova	2023 Nova	2024 Gillig
Fond du Lac Garage	Training Buses	5211 5217 5224 5228-5230	5302-5303 5305 5308 5310 5314 5318 5323 5326-5328 5331 5333 5337 5339-5340 5344-5346 5350-5351 5352, 5354		5500 5502-5533		5700-5719	5800-5814	5900-5927		6100-6113	6200-6229			6300-6313
183	0	6	23	0	33	0	20	15	28	0	14	30	0	0	14
Kinnickinnic Garage	5133 5163 5168 5183 5189	Training Buses	5304 5349	5400--5454		5600-5627	5720-5729			6000-6014 6016-6022		6230-6238 6240-6248 6250 6239 6249 6251-6258 Connect 1 Buses	1000-1010	1011-1012 1013-1014	6314-6327
180	5	0	2	55	0	28	10	0	0	22	0	29	11	4	14
Active Buses	5	6	25	55	33	28	30	15	28	22	14	59	11	4	28
MCTS BUS 363															

5100-5189	2010	5	40' / 39
5200-5234	2011	6	40' / 39
5300-5354	2012	25	40' / 39
5400-5454	2013	55	40' / 39
5500-5534	2014	33	40' / 39
5600-5627	2015	28	40' / 35
5700-5729	2016	30	40' / 36
5800-5814	2017	15	40' / 36
5900-5927	2019	28	40' / 36
6000-6022	2020	22	40' / 36
6100-6113	2021	14	40' / 36
6200-6229	2022	30	40' / 36
6230-6258	2022	29	40' / 36
1000-1010	2022	11	40' / 32
1011-1012	2023	4	40' / 32
6300-6327	2024	28	40' / 35
		363	

2025

OUT OF SERVICE:
5101, 5119, 5159, 5172
5200, 5206, 5207, 5214, 5220, 5222, 5226, 5233
5307,5313, 5316, 5317, 5319, 5325, 5330, 5335, 5338, 5343, 5347
5501, 5534

Total Active Buses	**363**
Out of Service Buses:	**25**
Grand Total:	**388**

Out of Service Buses: **25**

Peak Vehicle Count 12/1/2024-3/8/2025

FDL	143 with spares 172	spares with trainers 182
KK	137 with spares 164	spares with trainers 174
Total Count	280 with spares 336	spares with trainers 356

Peak Vehicle Count 8/25/2024-11/30/2024

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Milwaukee County Transit System
Interoffice Memorandum

TO: File

FROM: Isabella Lemieux – Transit Planning Intern

SUBJECT: 2025 Title VI Assessment of Compliance - Requirement to Monitor Transit Service

DATE: April 17th, 2026

Every year, planning staff compare the level and quality of transit service in minority and non-minority areas to ensure that the application of MCTS standards and policies results in an equitable distribution per Title VI guidelines. MCTS followed the service monitoring procedures described in the "Level of Service Methodology" section in Title VI regulations (FTA C 4702.1A, Page V-7). The ridership and service hours data used in this analysis were taken from the September 2025 schedule period.

For the purpose of assessing compliance with Title VI, a census tract is considered "minority" if the percent of non-white and/or Hispanic residents in that tract exceeds the countywide percentage. According to the 2023 American Community Survey 5-year estimates, 52.2% of Milwaukee County residents are not white and/or Hispanic. Census tracts with a percentage of minority residents less than 52.2% were identified as a non-minority tract. Each MCTS bus route was identified as primarily serving:

- Minority areas
  - If > 33.3% of the route mileage operated within minority tracts
- Non-Minority areas.
  - If < 33.3% of the route mileage operated within minority tracts

In 2025, MCTS operated 30 fixed routes in minority areas and 11 fixed routes in non-minority areas (see Appendix A). Shuttle service and school trippers were not included in this Title VI analysis.

Service Standards

Vehicle Load - Average maximum loads during the morning and afternoon peak periods were calculated for each route (see Appendix B). All fixed routes are below the standard of a 1.3 ratio between passengers and seats. The highest maximum loads were on minority routes; however, these load factors were still well below the standard.

Vehicle Headways – All routes are provided with sufficient service to meet demand. The headways of routes that serve minority areas are better than the headways on routes that serve non-minority areas (Appendix C).

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On Time Performance - All operators are required to meet an on-time performance (OTP) standard of being between one minute early and five minutes late at a time point. MCTS has a system-wide standard of 90% on time. Data from 2025 shows that on-time performance averaged 74% over the year (see Appendix D). Minority and non-minority routes have some differences in OTP with minority routes being 73% on-time and non-minority being 79% on-time.

Passengers per Bus Hour – The supply and demand for transit service is measured according to the number of passengers per bus hour (PBH) on a route. The application of this measure to the system produces an equitable distribution of bus hours (see Appendix E). While the passengers per bus hour is higher on routes that serve minority populations, the greater number of bus hours allocated to these routes shows that service hours are being allocated appropriately.

Distribution of Transit Amenities - The distribution of bus shelters is based on a scoring system that rates several factors such as daily ridership at the bus stop, if the stop is at a transfer corner, the level of exposure to the weather at the stop, and the demographics of the surrounding area. Most of the highest utilized bus stops, and thus shelters, are in areas that have a high minority population. In 2024, 55% of MCTS shelters were in census tracts identified as predominantly minority.

Route guides and timetables are distributed throughout the community. An entire set of all route guides can be found at libraries, government offices, and employment centers. Timetables for the specific route are also available on board the vehicle, with changes to the timetable being made available prior to implementation. Passengers can have printed timetables mailed to them and may also access schedule information via mobile phone applications or MCTS's website.

Passengers can pay fares with a WisGO card, through the UMO app, or with cash. WisGO cards are available at hundreds of retailers throughout the county including grocery stores, gas stations, and banks/credit unions. Just over half of these retailers are located in minority census tracts.

Service Availability – The span of service, i.e., the number of hours per day that a route is in service, is equitable between minority and non-minority areas (see Appendix F). No minority routes are in service for less than 15 hours on weekdays. The average service span for minority routes was 20 hours, and non-minority was 19 hours.

Service Policies

Vehicle Assignment – MCTS currently operates a fleet of 381 buses (see Appendix G). Just over half of the fleet is comprised of 40-foot standard New Flyer coaches with two doors, standard seats, and auxiliary heating and air conditioning. Over 100 Gillig coaches are part of the fleet with similar amenities as the New Flyer buses. MCTS also operates 14 battery-electric buses manufactured by Nova, all of which are reserved for use on the Connect 1 Bus Rapid Transit line. These buses are also 40 feet with two doors, standard seating, heating, and air conditioning. Several Gillig buses are reserved for the Connect 1 route as well (see Appendix G). The remainder of Gillig and New Flyer buses are available for use on any route and are assigned in no particular order.

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Transit Security – The Director of Safety, Security and Project Management and the Safety and Security Manager work in collaboration to coordinate all security and emergency related functions for MCTS and ensure its compliance with all local, state, and federal security guidelines. Meetings are held regularly with local law enforcement and emergency management leaders to foster strong communication and collaborative relationships.

Response to incidents and patrolling of MCTS property and bus routes is provided in part by Allied Universal Security Services, a private security firm contracted by MTS. MCTS has also recently began building an in-house Public Safety program which currently employes two supervisors and ten public safety officers. The program will continue to grow during 2025 with the addition of more officers and a Public Safety Manager position. Transit Security officers, whether in-house or contracted, are available to respond to transit incidents 24/7/365. With direction from the Safety and Security Manager, Transit Security managers assign priority for bus riding to the routes and times of day where MCTS and local crime data suggest a higher likelihood for security incidents to occur. They work to provide appropriate coverage for vehicle response and assign special teams to operators who report specific incidents. Data collected from operator calls through the CAD/AVL are analyzed monthly to aid the security team in the development of sound security deployment strategies.

The Safety, Security and Project Management Department along with representatives from the Transportation Department leadership meet monthly with representatives from the operator's union, and transit security to address and discuss security issues. These meetings have been an extremely effective mechanism to ensure quality communication between bus operators and the security team.

To deter and detect criminal activity, MCTS uses a 10-camera system with a 4-terabyte hard drive that will store weeks of video on board the bus. This system, provided by Luminator Technology, has 4 cameras that view the exterior of the bus on all sides and 6 high-definition, infrared cameras on the interior of the bus that record audio and video whenever the bus is in service. MCTS staff can request video from any bus in the fleet through a software interface and the video automatically downloads to a central server once the bus pulls into the station. The system also has live look capabilities, as well as the option to download video via cellular connection in the event of an emergency situation. This system has been an excellent addition to the transit security, customer service and risk management programs.

In partnership with the Milwaukee Police Department, MCTS has installed over 20 cameras at major transfer corners throughout the city. These cameras are owned and operated by MPD, but MCTS can request video from these cameras at any time.

The Safety, Security and Project Management Department trains all new operators in safe passenger interaction techniques, conflict communication skills and emergency response to an active shooter. During this 4-hour class, the TSA also presents to operators their First Observer Plus program on suspicious activity recognition and reporting.

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Appendix A: 2025 Minority and Non-Minority Routes

Table 1: Minority Routes

Route	Name
BLU	Fond du Lac - Mill
PUR	27th Street
RED	Capitol Drive
11	Hampton Avenue
12	Teutonia Avenue
18	National - Greenfield
19	Dr. M.L.K - S. 13th
20	S. 20th Street
21	North Avenue
22	Center Street
24	Forest Home - 16th
30	Sherman - Wisconsin
33	Vliet -84th
34	Hopkins - Congress
35	35th Street
51	Oklahoma Avenue
53	Lincoln Avenue
54	Mitchell - Burnham
56	Greenfield - 43rd
57	Walnut -Lisbon
58	Villard Avenue
60	60th Street
63	Silver Spring-Pt. Washington
66	Burleigh Street
73	Mill Road
74	43rd Street
76	76th Street
80	6th - Green Bay
88	Brown Deer
92	92nd Street

Table 2: Non-minority Routes

Route	Name
CN1	Connect 1 - Wisconsin
GRE	Oakland-Howell
14	Humboldt
15	Holton - Kinnickinnic
28	108th Street
31	State - Highland
52	Clement-Pennsylvania
55	Layton Avenue
59	Drexel Avenue
68	Port Washington
82	S. 13th-Howell

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Appendix B: 2024 Average Maximum Loads

Table 1: Average Maximum Loads on Minority Routes

Route	Name	AM Load	PM Load
BLU	Fond du Lac - Mill	18	21
PUR	27th Street	32	37
RED	Capitol Drive	30	32
11	Hampton Avenue	11	12
12	Teutonia Avenue	18	23
18	National - Greenfield	19	29
19	Dr. M.L.K - S. 13th	24	30
20	S. 20th Street	22	8
21	North Avenue	21	26
22	Center Street	20	24
24	Forest Home - 16th	17	24
30	Sherman - Wisconsin	27	28
33	Vliet -84th	12	12
34	Hopkins - Congress	21	18
35	35th Street	17	25
51	Oklahoma Avenue	23	35
53	Lincoln Avenue	13	17
54	Mitchell - Burnham	14	23
56	Greenfield - 43rd	9	13
57	Walnut -Lisbon	21	22
58	Villard Avenue	8	8
60	60th Street	24	31
63	Silver Spring-Pt. Washington	13	14
66	Burleigh Street	16	21
73	Mill Road	14	10
74	43rd Street	4	4
76	76th Street	23	26
80	6th - Green Bay	17	21
88	Brown Deer	8	10
92	92nd Street	19	17
	Group Average	**18**	**21**

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Table 2: Average Maximum Loads on Non-Minority Routes

Route	Name	AM Load	PM Load
CN1	Connect 1 - Wisconsin Ave	15	16
GRE	Oakland-Howell	25	30
14	Forest Home/Humboldt	18	22
15	Holton - Kinnickinnic	18	32
28	108th Street	10	12
31	State - Highland	14	22
52	Clement-Pennsylvania	6	6
55	Layton Avenue	10	15
59	Drexel Avenue	3	4
68	Port Washington	7	11
82	S. 13th-Howell	5	6
	Group Average	**12**	**16**

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Appendix C: 2025 Average Headways

Table 1: Weekday Average Headways

Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Minority		6a-9a	9a-3p	3p-6p	6-9:30p	9:30 - XX
BLU	Fond du Lac - Mill	15	22	16	33	33
PUR	27th Street	13	15	13	18	25
RED	Capitol Drive	14	15	16	23	25
11	Hampton Avenue	32	32	35	30	30
12	Teutonia Avenue	15	21	16	25	34
18	National - Greenfield	15	22	17	20	34
19	Dr. M.L.K - S. 13th	15	23	17	22	27
20	S. 20th Street	60	60	60	60	N/A
21	North Avenue	16	23	17	25	23
22	Center Street	22	27	23	25	30
24	Forest Home - 16th	25	25	28	30	35
30	Sherman - Wisconsin	10	10	11	15	21
33	Vliet -84th	30	45	32	32	40
34	Hopkins - Congress	32	33	32	33	45
35	35th Street	15	20	16	22	25
51	Oklahoma Avenue	14	15	15	22	24
53	Lincoln Avenue	20	21	23	28	38
54	Mitchell - Burnham	29	30	30	31	42
56	Greenfield - 43rd	28	28	31	38	37
57	Walnut -Lisbon	22	29	31	35	35
58	Villard Avenue	50	50	53	50	N/A
60	60th Street	21	21	21	27	28
63	Silver Spring-Pt. Washington	14	22	15	23	30
66	Burleigh Street	16	25	18	27	32
73	Mill Road	45	45	45	45	45
74	43rd Street	27	28	29	29	28
76	76th Street	15	24	17	30	30
80	6th - Green Bay	15	21	15	28	29
88	Brown Deer	39	39	39	36	36
92	92nd Street	35	44	34	40	47
	Group Average	**24**	**28**	**26**	**30**	**32**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 Wisconsin Ave	10	10	10	15	25
GRE	Oakland-Howell	14	14	15	19	28
14	Humboldt	25	26	26	27	32
15	Holton - Kinnickinnic	15	15	15	23	30
28	108th Street	30	41	32	40	55
31	State - Highland	30	31	33	30	29
52	Clement-Pennsylvania	45	45	45	45	N/A
55	Layton Avenue	29	30	30	30	42
59	Drexel Avenue	35	35	35	35	N/A
68	Port Washington	39	39	42	39	N/A
82	S. 13th-Howell	38	38	38	38	N/A
	Group Average	**28**	**29**	**29**	**31**	**34**

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Table 2: Saturday Headways

Route **Minority**	Name	AM HW 6a-9a	MD HW 9a-3p	PM HW 3p-6p	EV HW 6-9:30p	LN HW 9:30 - XX
BLU	Fond du Lac - Mill	32	26	27	32	32
PUR	27th Street	21	19	18	25	28
RED	Capitol Drive	18	17	17	21	24
11	Hampton Avenue	32	32	32	30	29
12	Teutonia Avenue	30	26	26	28	33
18	National - Greenfield	20	21	22	28	37
19	Dr. M.L.K - S. 13th	21	21	23	35	33
20	S. 20th Street	57	57	57	57	N/A
21	North Avenue	22	25	25	22	28
22	Center Street	32	34	34	34	32
24	Forest Home - 16th	32	32	32	33	33
30	Sherman - Wisconsin	13	14	16	17	26
33	Vliet -84th	44	44	43	40	40
34	Hopkins - Congress	46	32	34	49	47
35	35th Street	18	20	20	29	31
51	Oklahoma Avenue	26	29	29	27	38
53	Lincoln Avenue	38	27	27	38	38
54	Mitchell - Burnham	29	31	32	39	37
56	Greenfield - 43rd	35	26	26	36	34
57	Walnut -Lisbon	34	36	37	36	36
58	Villard Avenue	N/A	51	50	46	N/A
60	60th Street	28	29	29	34	34
63	Silver Spring-Pt. Washington	31	23	23	22	31
66	Burleigh Street	20	21	21	27	27
73	Mill Road	45	45	45	45	45
74	43rd Street	27	27	28	29	N/A
76	76th Street	35	31	31	31	34
80	6th - Green Bay	24	24	24	25	26
88	Brown Deer	38	39	35	35	34
92	92nd Street	50	53	53	50	50
	Group Average	**31**	**30**	**31**	**33**	**34**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 - Wisconsin Ave	15	15	15	20	30
GRE	Oakland-Howell	20	20	20	20	28
14	Humboldt	30	30	34	34	45
15	Holton - Kinnickinnic	22	22	22	22	28
28	108th Street	38	40	41	41	56
31	State - Highland	29	29	29	29	41
52	Clement-Pennsylvania	43	44	44	44	N/A
59	Drexel Avenue	35	35	35	35	N/A
55	Layton Avenue	28	29	28	27	36
68	Port Washington	37	38	37	38	N/A
82	S. 13th-Howell	38	40	40	36	N/A
	Group Average	**30**	**31**	**31**	**31**	**38**

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Table 3: Sunday Headways

Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Minority		6a-9a	9a-3p	3p-6p	6-9:30p	9:30 - XX
BLU	Fond du Lac - Mill	26	25	26	30	30
PUR	27th Street	21	17	17	17	30
RED	Capitol Drive	18	17	17	21	24
11	Hampton Avenue	29	30	31	28	28
12	Teutonia Avenue	25	26	26	33	33
18	National - Greenfield	27	24	24	29	35
19	Dr. M.L.K - S. 13th	35	25	24	25	45
20	S. 20th Street	56	56	56	56	N/A
21	North Avenue	28	23	23	26	28
22	Center Street	30	34	34	32	30
24	Forest Home - 16th	40	32	31	35	33
30	Sherman - Wisconsin	20	15	15	19	28
33	Vliet -84th	40	41	40	39	39
34	Hopkins - Congress	43	30	34	46	45
35	35th Street	24	26	26	30	41
51	Oklahoma Avenue	39	28	28	28	38
53	Lincoln Avenue	38	38	26	36	38
54	Mitchell - Burnham	34	30	30	36	53
56	Greenfield - 43rd	34	26	26	37	33
57	Walnut -Lisbon	33	34	36	34	34
58	Villard Avenue	28	30	30	28	28
60	60th Street	33	29	29	33	33
63	Silver Spring-Pt. Washington	29	21	23	31	30
66	Burleigh Street	26	21	21	27	25
73	Mill Road	45	45	45	45	44
74	43rd Street	26	26	27	25	N/A
76	76th Street	33	27	25	36	35
80	6th - Green Bay	27	23	23	28	31
88	Brown Deer	34	38	38	34	34
92	92nd Street	44	45	47	46	49
	Group Average	**32**	**29**	**29**	**32**	**35**

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Route	Name	AM HW	MD HW	PM HW	EV HW	LN HW
Non-Minority						
CN1	Connect 1 - Wisconsin Ave	20	15	15	20	30
GRE	Oakland-Howell	24	25	26	35	43
14	Humboldt	45	32	32	34	44
15	Holton - Kinnickinnic	26	24	24	34	33
28	108th Street	54	38	43	52	N/A
31	State - Highland	38	29	29	37	40
52	Clement-Pennsylvania	44	44	44	44	N/A
55	Layton Avenue	26	27	27	38	38
59	Drexel Avenue	35	35	35	35	N/A
68	Port Washington	36	36	37	38	N/A
82	S. 13th-Howell	35	37	38	36	N/A
	Group Average	**35**	**31**	**32**	**37**	**38**

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Appendix D: 2025 On-Time Performance

Table 1: Average OTP in 2025

Route	Average OTP
11 - Hampton Avenue	82.41%
12 - Teutonia Avenue	72.04%
18 - National - Greenfield	70.58%
19 - Dr. MLK Jr. Drive-S. 13th	71.17%
20 - S. 20th Street	52.89%
21 - North Avenue	73.49%
22 - Center Street	74.38%
24 - Forest Home - 16th	66.55%
30 - Sherman-Wisconsin	63.40%
33 - Vliet-84th	78.76%
34 - Hopkins-Congress GIANNIS LINE	76.38%
35 - 35th Street	77.30%
51 - Oklahoma Avenue	85.05%
53 - Lincoln Avenue	71.63%
54 - Mitchell-Burnham	72.14%
56 - Greenfield-S. 43rd	77.15%
57 - Walnut-Appleton	63.63%
58 - Villard Avenue	61.40%
60 - 60th Street	81.12%
63 - Silver Spring Drive	79.84%
66 - Burleigh Street	66.28%
73 - Mill Road	81.41%
74 - 43rd Street	87.87%
76 - 76th Street	78.95%
80 - 6th Street	74.25%
88 - Brown Deer Road	82.38%
92 - 92nd Street	62.49%
BLU - BlueLine Fond du Lac-Mill	72.93%
PUR - PurpleLine 27th Street	67.69%
RED - RedLine Capitol Drive	75.09%
Group Average	**73.36%**

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Route	Average OTP
Non-minority	
14 - Humboldt Boulevard	75.03%
15 - Holton-Kinnickinnic	70.39%
28 - 108th Street	74.61%
31 - State-Highland	73.12%
52 - Clement-Pennsylvania	67.38%
55 - Clement-Pennsylvania	86.84%
59 - Drexel Avenue	87.85%
68 - Port Washington	76.23%
82 - S. 13th-Howell	95.06%
CN1 - CONNECT 1 Wisconsin Ave BRT	83.76%
GRE - GreenLine Bayshore-Airport	76.94%
Group Average	**78.84%**

Table 2: Average OTP by month (all fixed routes)

Month	**Average OTP**
January	84.7%
February	80.2%
March	82.6%
April	80.5%
May	78.1%
June	77.6%
July	76.9%
August	75.7%
September	73.1%
October	75.0%
November	76.1%
December	77.1%
Total	**78.1%**

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Appendix E: 2025 Weekday Ridership, Bus Hours, and Passengers per Bus Hour (PBH)

Route	Name	Type of Route	Avg. Ridership	Bus Hours	PBH
Minority					
BLU	Fond du Lac - Mill	Regular	2234	103	22
PUR	27th Street	Regular	5716	207	28
RED	Capitol Drive	Regular	4253	162	26
11	Hampton Avenue	Regular	712	39	18
12	Teutonia Avenue	Regular	2633	101	26
18	National - Greenfield	Regular	3018	128	24
19	Dr. M.L.K - S. 13th	Regular	3542	159	22
20	S. 20th Street	Regular	232	15	15
21	North Avenue	Regular	2806	121	23
22	Center Street	Regular	1849	80	23
24	Forest Home - 16th	Regular	1582	89	18
30	Sherman - Wisconsin	Regular	7530	244	31
33	Vliet -84th	Regular	616	42	15
34	Hopkins - Congress	Regular	839	53	16
35	35th Street	Regular	3080	152	20
51	Oklahoma Avenue	Regular	2028	84	24
53	Lincoln Avenue	Regular	1229	68	18
54	Mitchell - Burnham	Regular	1455	74	20
56	Greenfield - 43rd	Regular	788	51	15
57	Walnut -Lisbon	Regular	1639	77	21
58	Villard Avenue	Regular	235	13	18
60	60th Street	Regular	2298	126	18
63	Silver Spring-Pt. Washington	Regular	1527	67	23
66	Burleigh Street	Regular	2111	96	22
73	Mill Road	Regular	389	37	11
74	43rd Street	Regular	240	33	7
76	76th Street	Regular	3203	153	21
80	6th - Green Bay	Regular	2782	158	18
88	Brown Deer	Regular	497	38	13
92	92nd Street	Regular	1098	81	14
		Group Average	**2072**	**95**	**20**

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Route	Name	Type of Route	Avg. Ridership	Bus Hours	PBH
Non-Minority					
CN1	Wisconsin	Regular	3240	141	23
GRE	Oakland-Howell	Regular	4784	191	25
14	Humboldt	Regular	1193	71	17
15	Holton - Kinnickinnic	Regular	3356	149	23
28	108th Street	Regular	934	61	15
31	State - Highland	Regular	911	54	17
52	Clement-Pennsylvania	Regular	143	28	5
55	Layton Avenue	Regular	869	51	17
59	Drexel Avenue	Regular	146	30	5
68	Port Washington	Regular	439	27	16
82	S. 13th-Howell	Regular	178	15	12
		Group Average	**1472**	**74**	**16**

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Appendix F: 2024 Service Hours

Route	Name	Type of Route	Hours of Day
Minority			
BLU	Fond du Lac - Mill	Regular	21
PUR	27th Street	Regular	22
RED	Capitol Drive	Regular	21
11	Hampton Avenue	Regular	19
12	Teutonia Avenue	Regular	20
18	National - Greenfield	Regular	22
19	Dr. M.L.K - S. 13th	Regular	21
20	S. 20th Street	Regular	15
21	North Avenue	Regular	22
22	Center Street	Regular	20
24	Forest Home - 16th	Regular	20
30	Sherman - Wisconsin	Regular	22
33	Vliet -84th	Regular	18
34	Hopkins - Congress	Regular	20
35	35th Street	Regular	21
51	Oklahoma Avenue	Regular	20
53	Lincoln Avenue	Regular	19
54	Mitchell - Burnham	Regular	20
56	Greenfield - 43rd	Regular	20
57	Walnut -Lisbon	Regular	20
58	Villard Avenue	Regular	20
60	60th Street	Regular	19
63	Silver Spring-Pt. Washington	Regular	20
66	Burleigh Street	Regular	21
73	Mill Road	Regular	19
74	43rd Street	Regular	18
76	76th Street	Regular	21
80	6th - Green Bay	Regular	20
88	Brown Deer	Regular	20
92	92nd Street	Regular	20
		Group Average	**20**

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Route	Name	Type of Route	Hours of Day
Non-Minority			
CN1	Wisconsin	Regular	21
GRE	Oakland-Howell	Regular	22
14	Humboldt	Regular	20
15	Holton - Kinnickinnic	Regular	22
28	108th Street	Regular	19
31	State - Highland	Regular	19
52	Clement-Pennsylvania	Regular	14
55	Layton Avenue	Regular	18
59	Drexel Avenue	Regular	16
68	Port Washington	Regular	15
82	S. 13th-Howell	Regular	18
		Group Average	**19**

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Appendix G: 2024 Bus Counts

	DISTRIBUTION LIST AS OF				04/13/26														
KK	157	FD	173	CS	51	Active	330		TOTAL	381									
2010	2011	2012	2012	2013	2013	2014	2015	2016	2017	2019	2020	2021	2021	2022	2022	2023	2024	2025
5163 CS	5211 CS	5304 CS	5349 CS	5400 KK	5428 KK	5500 FD	5600 KK	5700 FD	5800 FD	5900 FD	6000 KK	6100 FD	6200 FD	6230 KK	1000 KK	1011 KK	6300 FD	6400 FD
5168 CS	5217 CS	5305 CS	5350 CS	5401 CS	5429 KK	5502 FD	5601 KK	5701 FD	5801 FD	5901 FD	6001 KK	6101 FD	6201 FD	6231 KK	1001 KK	1012 KK	6301 FD	6401 FD
5183 CS	5224 CS	5308 CS	5351 CS	5402 KK	5430 KK	5503 FD	5602 KK	5702 FD	5802 FD	5902 FD	6002 KK	6102 FD	6202 FD	6232 KK	1002 KK	1013 KK	6302 FD	6402 FD
5189 CS	5228 CS	5310 CS	5352 CS	5403 KK	5431 CS	5504 FD	5603 KK	5703 FD	5803 FD	5903 FD	6003 KK	6103 FD	6203 FD	6233 KK	1003 KK	1014 KK	6303 FD	6403 FD
	5229 CS	5314 CS	5354 CS	5404 CS	5432 KK	5055 CS	5604 KK	5704 FD	5804 FD	5904 FD	6004 KK	6104 FD	6204 FD	6234 KK	1004 KK		6304 FD	6404 FD
	5230 CS	5323 CS		5405 CS	5433 KK	5506 FD	5605 KK	5705 FD	5805 FD	5905 FD	6005 KK	6105 FD	6205 FD	6235 KK	1005 KK		6305 FD	6405 FD
		5327 CS		5406 KK	5434 CS	5507 CS	5606 KK	5706 FD	5806 FD	5906 FD	6006 KK	6106 FD	6206 FD	6236 KK	1006 KK		6306 FD	6406 FD
		5328 CS		5407 CS	5435 KK	5508 FD	5607 KK	5707 FD	5807 FD	5907 FD	6007 KK	6107 FD	6207 FD	6237 KK	1007 KK		6307 FD	6407 FD
		5331 CS		5408 CS	5436 KK	5509 FD	5608 KK	5708 FD	5808 FD	5908 FD	6008 KK	6108 FD	6208 CS	6238 KK	1008 KK		6308 FD	6408 FD
		5333 CS		5409 CS	5437 CS	5510 FD	5609 KK	5709 FD	5809 FD	5909 FD	6009 KK	6109 FD	6209 FD	6239 KK	1009 KK		6309 FD	6409 FD
		5340 CS		5410 KK	5438 KK	5511 FD	5610 KK	5710 FD	5810 FD	5910 FD	6010 KK	6110 FD	6210 FD	6240 KK			6310 FD	6410 FD
				5411 KK	5439 CS	5512 FD	5611 KK	5711 FD	5811 FD	5911 CS	6011 KK	6111 FD	6211 FD	6241 KK			6311 FD	6411 FD
				5412 KK	5440 KK	5514 FD	5612 KK	5712 FD	5812 FD	5912 FD	6012 KK	6112 FD	6212 FD	6242 KK			6312 FD	6412 FD
				5413 KK	5441 CS	5515 FD	5613 KK	5713 FD	5813 FD	5913 FD	6013 KK	6113 FD	6213 FD	6243 KK			6313 FD	6413 FD
				5414 CS	5442 CS	5516 FD	5614 KK	5714 FD	5814 FD	5914 FD	6014 KK		6214 FD	6244 KK			6314 KK	6414 FD
				5415 CS	5443 CS	5517 FD	5615 KK	5715 FD		5915 FD	6016 KK		6215 FD	6245 KK			6315 KK	6415 KK
				5416 KK	5444 KK	5518 FD	5616 KK	5716 FD		5916 FD	6017 KK		6216 FD	6246 KK			6316 CS	6416 KK
				5417 KK	5445 CS	5519 FD	5617 KK	5717 FD		5917 FD	6018 KK		6217 FD	6247 KK			6317 KK	6417 KK
				5418 KK	5446 KK	5520 FD	5618 KK	5718 FD		5918 FD	6019 KK		6218 FD	6248 KK			6318 KK	6418 KK
				5419 KK	5447 KK	5521 FD	5619 KK	5719 FD		5919 FD	6020 KK		6219 FD	6249 KK	Connect 1 Buses		6319 KK	6419 KK
				5420 KK	5448 CS	5522 FD	5620 KK	5720 FD		5920 FD	6021 KK		6220 FD	6250 KK			6320 KK	6420 KK
				5421 KK	5449 CS	5523 FD	5621 KK	5721 FD		5921 FD	6022 KK		6221 FD	6251 KK			6321 KK	6421 KK
				5422 KK	5450 KK	5524 FD	5622 KK	5722 FD		5922 FD			6222 FD	6252 KK			6322 KK	6422 KK
				5423 KK	5451 KK	5525 FD	5623 KK	5723 FD		5923 FD			6223 FD	6253 KK			6323 KK	6423 KK
				5424 KK	5452 KK	5526 FD	5624 KK	5724 FD		5924 FD			6224 FD	6254 KK			6324 KK	6424 KK
				5425 KK	5453 KK	5527 FD	5625 KK	5725 FD		5925 FD			6225 FD	6255 KK			6325 KK	6425 KK
				5426 CS	5454 KK	5528 FD	5626 KK	5726 FD		5926 FD			6226 FD	6256 KK			6326 KK	6426 KK
				5427 KK		5529 FD	5627 KK	5727 FD		5927 FD			6227 FD	6257 KK			6327 KK	6427 KK
						5530 CS		5728 FD					6228 FD	6258 KK				6428 KK
						5531 FD		5729 FD					6229 FD					6429 KK
						5532 FD												
						5533 FD												

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Milwaukee County Transit System
Interoffice Memorandum

TO: File

FROM: Dan Adams, Planning Manager

SUBJECT: Executive Summary – Demographic / Service Profile Survey and Maps

DATE: April 15, 2026

MCTS collects racial and ethnic population data to understand rider characteristics and travel patterns. MCTS maintains and updates this information as part of routine planning activities.

According to 2024 data from the American Community Survey, the minority population represents 51.9% of the total population in the MCTS service area (see map below). The majority of minority residents live in the north central, northwest, and near south sides of Milwaukee County. As shown on the map, these areas are served by many routes and represent a significant proportion of all transit service in the MCTS system. The low-income population represents 17.2% of the County's total population (see map below). The majority of low-income residents live in the north central, northwest, and near south sides of Milwaukee County.

MCTS conducts a Customer Satisfaction Survey every year to generate a rider profile and collect data on riders' opinions. Through 2024, MCTS worked with a private firm, NuStats, to develop, conduct, and compile results for this survey. MCTS changed vendors to CMRIgnite in 2025, providing an opportunity to adjust elements of the survey design and deployment. The survey was distributed to 700 respondents recruited in advance to participate and 1,155 respondents contacted via MCTS's various outreach channels including email newsletter, Umo app subscribers, past survey respondents, and flyers on buses and at bus stops. These 1,855 survey respondents are a large increase from the 1,176 respondents in 2024 and 1,332 respondents in 2023. The survey respondents in 2025 were more representative of MCTS ridership than in prior years, when comparing the routes respondents use with MCTS ridership data. You can see the ridership profile and additional survey response data immediately following the key findings section below.

The key findings from our 2025 Customer Satisfaction survey are as follows.

- The largest proportion (54%) of respondents to the survey indicated they are White, followed by riders who identify as Black/African-American (22%). 13% or riders identify as Spanish, Hispanic, or Latino origin.

- 15% of respondents reported they earned less than $25,000 in total household income. 30% of respondents reported they earned more than $100,000 in total household income.

- The top three reasons respondents gave for riding the bus were personal business/errands (57%), recreation/social activities (52%), and commuting to work (51%). Note that respondents were

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allowed to select as many reasons as they wanted, unlike past surveys that limited them to a single response.

- 28% of respondents reported they do not have a driver's license or are not able to drive for other reasons.
- 51% of respondents say they are satisfied with their personal security on the bus.
- Nearly half of respondents use real-time tracking every time they ride the bus.
- Overall, 77% of respondents reported MCTS meets or exceeds their needs.

MCTS Customer Satisfaction Survey Data – Ridership Profile and Opinions

This is a sample of data from the 2023, 2024, and 2025 MCTS Customer Satisfaction Survey. This data gives us a profile of our riders and insight into their opinions on MCTS operations, service, and activities. Note that for the 2023 and 2024 surveys, MCTS worked with the vendor NuStats to design, conduct, and compile survey data. In 2025, MCTS worked with the vendor CRM Ignite, allowing us to adjust the survey design and outreach. These adjustments better reflect industry standards for question wording, ordering, and outreach. As a result of these changes, we were able to gather a larger and more representative sample of MCTS riders. Changes also mean that some data is not directly comparable from prior years and you may see some values listed as "n/a" where the question wasn't asked in certain years or there may be clarifying notes explaining differences between survey years.

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DEMOGRAPHIC PROFILE

Gender	2023	2024	2025
Female	50%	45%	50%
Male	44%	42%	45%
Non-Binary	3%	1%	2%
Prefer not to respond	2%	2%	3%

Race and Ethnicity	2023	2024	2025
American Indian or Alaska Native	n/a	n/a	3%
Asian/Pacific Islander	n/a	n/a	4%
Black/African-American	22%	24%	22%
White	53%	58%	54%
Other	6%	6%	10%
Prefer not to respond	12%	5%	6%
Spanish, Hispanic, or Latino*	7%	7%	13%

**Note that "Spanish, Hispanic, or Latino" was asked as a separate question in 2025, thus resulting in more than 100% total responses for this section.*

Age	2023	2024	2025
18 to 24	13%	7%	12%
25 to 34	19%	23%	20%
35 to 44	14%	19%	17%
45 to 54	14%	17%	15%
55 to 64	13%	15%	15%
65 or over	19%	17%	20%
Prefer not to respond	8%	2%	2%

Education	2023	2024	2025
Grade school or less	1%	0.1%	n/a
Some high school	3%	5%	8%
High school graduate	19%	20%	26%
Some Voc/Tech School	5%	5%	n/a
Voc/Tech degree	5%	9%	7%
Some college	21%	18%	22%
College graduate	25%	26%	22%
Post Graduate	14%	15%	9%
Prefer not to respond	7%	2%	2%

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Employment	2023	2024	2025
Not employed	9%	6%	7%
Full-time	46%	55%	51%
Part-time	17%	19%	15%
Student	15%	10%	5%
Retired	17%	15%	19%
Prefer not to respond	7%	7%	3%

Total Household Income	2023	2024	2025
Less than $10,000	22%	19%	7%
$10,000 to $24,999*			8%
$25,000 to $49,999	23%	34%	13%
$50,000 to $74,999	11%	11%	13%
$75,000 to $99,999	5%	5%	11%
$100,000 to $149,999	6%	8%	17%
$150,000 to $199,999	5%	2%	6%
$200,000 or more*			7%
Don't Know	8%	4%	5%
Prefer not to respond	21%	16%	14%

**New income categories were added for 2025 to better reflect industry standards.*

Including yourself, how many adults 18 or older live in your household?	2023	2024	2025
One	n/a	n/a	27%
Two	n/a	n/a	44%
Three	n/a	n/a	13%
Four or more	n/a	n/a	10%
Prefer not to respond	n/a	n/a	6%

What is your marital status?	2023	2024	2025
Married	n/a	n/a	36%
Widowed	n/a	n/a	5%
Divorced	n/a	n/a	9%
Separated	n/a	n/a	1%
Never married	n/a	n/a	40%
Prefer not to respond	n/a	n/a	9%

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Disability	2023	2024	2025
I have difficulty seeing	n/a	n/a	7%
I have difficulty hearing	n/a	n/a	4%
I have mobility issues	n/a	n/a	10%
I use a wheelchair, walker, or cane	n/a	n/a	5%
I have trouble regulating emotions	n/a	n/a	4%
I have trouble understanding information	n/a	n/a	3%
I have trouble remembering	n/a	n/a	4%
Difficulty walking/other physical impairment	9%	11%	n/a
Sensory disability	2%	3%	n/a
Cognitive, memory, wayfinding difficulty	1%	1%	n/a
None	85%	83%	73%
Other	3%	1%	n/a
Prefer not to respond	n/a	n/a	3%

SERVICE USE

Years Using MCTS for Transportation Needs	2023	2024	2025
Less than 1 year	15%	11%	8%
1 - 2 years	11%	12%	12%
3-5 years	14%	14%	17%
6-9 years	10%	6%	9%
10-14 years	8%	6%	7%
15 years or more	38%	47%	38%
Don't know	4%	5%	4%

Why do you ride, or would you consider riding, MCTS buses?	2023	2024	2025
Personal business/errands (grocery shopping, banking, etc.)	8%	11%	57%
Recreation/social activities (restaurants, entertainment, etc.)	20%	27%	52%
Commute between home and work	39%	47%	51%
Medical/dental appointments	6%	7%	38%
Work-related business	n/a	n/a	27%
Commute to or from airport	n/a	n/a	22%
Commute between home and school	10%	8%	19%
Commute between home and church	n/a	n/a	11%
Other	15%	0%	5%

**In 2023 and 2024, respondents were only able to select response. In 2025, respondents were able to select all responses that applied (more than one).*

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Reasons Riding MCTS Matters to You	2023	2024	2025
No personal vehicle available	n/a	49%	44%
Less stressful than driving	n/a	47%	50%
Save money on parking	n/a	46%	48%
Reduces pollution/helps keep the environment cleaner	n/a	42%	36%
Save money on gas	n/a	39%	47%
Reduces traffic congestion	n/a	33%	37%
Safer than driving a car	n/a	29%	32%
No driver's license/don't drive	n/a	22%	28%
Medical condition prevents driving	n/a	7%	12%
Other	n/a	n/a	5%

How Often Plan to Ride in Coming Year	2023	2024	2025
Same	N/A	53%	55%
More often	N/A	30%	30%
Less often	N/A	16%	16%

Alternative Means of Travel	2023	2024	2025
Private Vehicle as Driver	33%	31%	25%
Taxi/Rideshare (Uber, Lyft, etc.)	20%	19%	24%
Walk	19%	13%	17%
Private Vehicle as Passenger	7%	10%	10%
I have no other means of travel	11%	12%	9%
Bicycle, or other non-motorized means (skateboard, etc.)	8%	11%	6%
The HOP streetcar	1%	2%	1%
Motorcycle, moped	0.4%	1%	1%

Use Real-Time Info	2023	2024	2025
Every Time I Ride the Bus	55%	49%	47%
Most of the time	N/A	17%	18%
Sometimes	18%	12%	15%
Rarely	11%	8%	7%
Never	16%	14%	12%

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Primary Access to Real-Time Info	2023	2024	2025
MCTS Website	45%	23%	18%
Umo App (official MCTS app)	22%	31%	30%
The MCTS telephone info line	13%	7%	4%
Transit App	n/a	6%	11%
MCTS Tracker App (3rd party app)	n/a	13%	19%
Google Maps	n/a	14%	12%
Apple Maps	n/a	4%	4%
Text messages	6%	2%	2%

MCTS INFORMATION & COMMUNICATIONS

How do you get information regarding MCTS?	2023	2024	2025
MCTS Website	33%	39%	44%
Umo app	34%	26%	40%
MCTS Social Media	6%	5%	14%
MCTS Printed Schedules	5%	3%	18%
Rider Insider email newsletter	3%	5%	18%
BusLines print newsletter	4%	3%	10%
Local News	7%	6%	23%
Signs at Bus Stops	3%	8%	38%
Audio info on the buses	2%	3%	13%
Bus shelters	3%	8%	18%
City of Milwaukee E-Notify emails or texts	n/a	n/a	11%
Digital/online ads (social media, online searches, etc.)	n/a	n/a	10%
Other	4%	2%	3%

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What other ways would you want to hear/see messages about MCTS?	2023	2024	2025
Information available on buses	n/a	n/a	40%
Flyers/posters/brochures	n/a	n/a	23%
YouTube	n/a	n/a	18%
Ads in places around the community	n/a	n/a	18%
Community/neighborhood events	n/a	n/a	18%
Billboards	n/a	n/a	17%
TikTok	n/a	n/a	13%
Television	n/a	n/a	9%
Nextdoor	n/a	n/a	9%
Radio/streaming radio	n/a	n/a	7%
Reddit	n/a	n/a	6%
Snapchat	n/a	n/a	6%
LinkedIn	n/a	n/a	5%
Threads	n/a	n/a	4%
Other	n/a	n/a	4%
None of these	n/a	n/a	25%

Visited MCTS Website in the Last Month	2023	2024	2025
Yes	47%	46%	47%
No	47%	51%	47%
Don't Know	6%	3%	5%

In regard to obtaining information about bus services, please indicate whether MCTS meets your needs	2023	2024	2025
The ease of using the Umo mobile app to pay your fare	81%	77%	84%
The ease of finding information on the RideMCTS.com website	77%	76%	81%
The information about routes provided by the automated phone system	n/a	76%	77%
The information provided by MCTS Customer Service when you call or email them	71%	75%	77%
The ease of using the Umo mobile app to track your bus	72%	62%	76%
The ease of getting detour/route change information	67%	66%	69%

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CUSTOMER SATISFACTION

Overall, Would You Say the Milwaukee County Transit System ...	2023	2024	2025
Exceeds needs	14%	12%	18%
Meets needs	58%	58%	59%
Nearly meets needs	19%	22%	17%
Does not meet needs	4%	8%	5%

How satisfied are you with each of the following?	2023	2024	2025
Overall satisfaction with MCTS	n/a	n/a	69%
Ease of boarding/exiting the bus	n/a	n/a	79%
Overall satisfaction with the bus driver(s)	n/a	n/a	75%
Availability of seats on the bus	n/a	n/a	74%
Travel speed of the bus	n/a	n/a	69%
Accuracy of real-time info for buses	n/a	n/a	59%
Personal security on the bus	n/a	n/a	51%
Wait time for the next bus	n/a	n/a	46%
Reliability of bus services	70%	64%	63%
Cleanliness of bus interior	72%	66%	56%
Cleanliness of the bus stop	51%	45%	48%

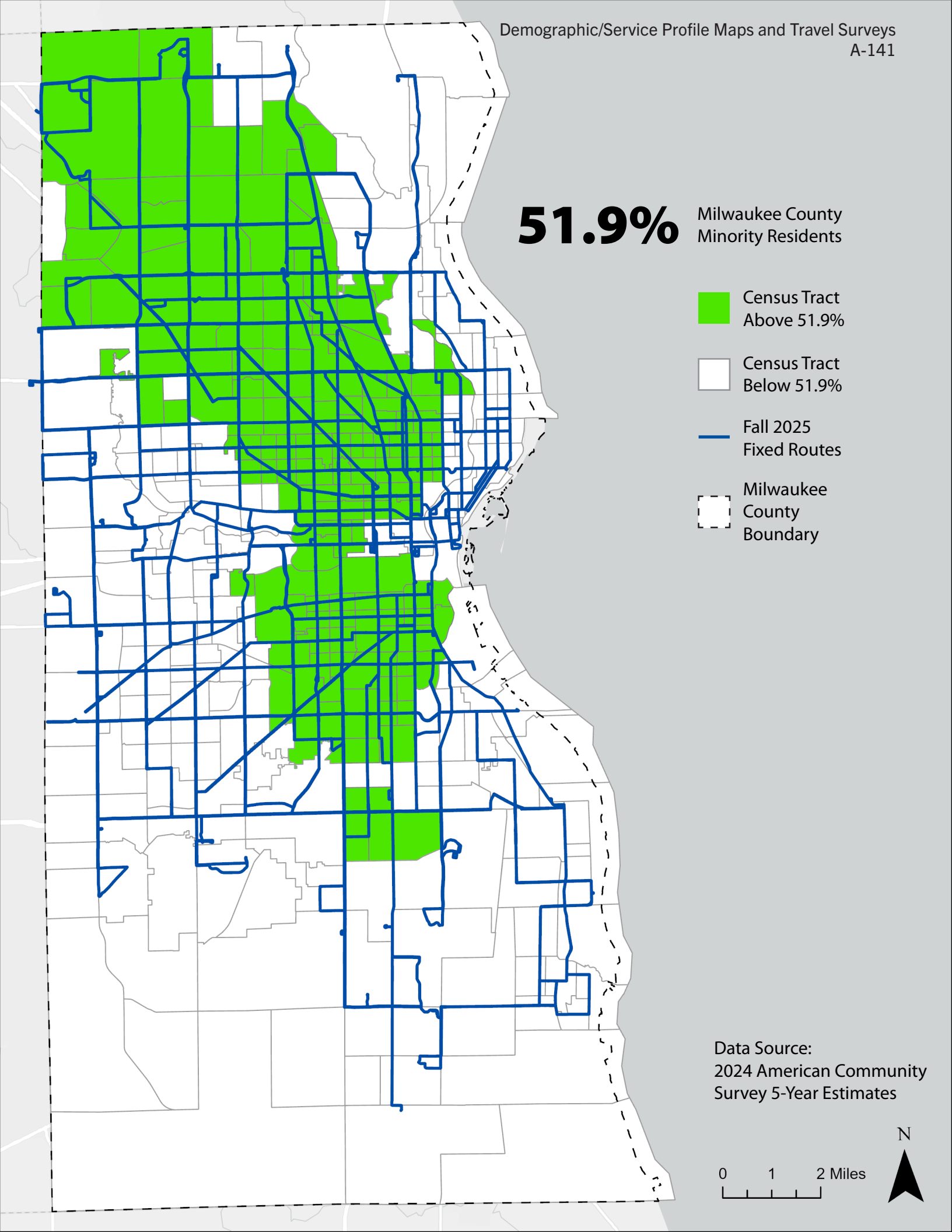
Net Promoter Score	2023	2024	2025
All respondents	n/a	20	1
Frequent Riders (used MCTS in past 30 days)	n/a	n/a	8

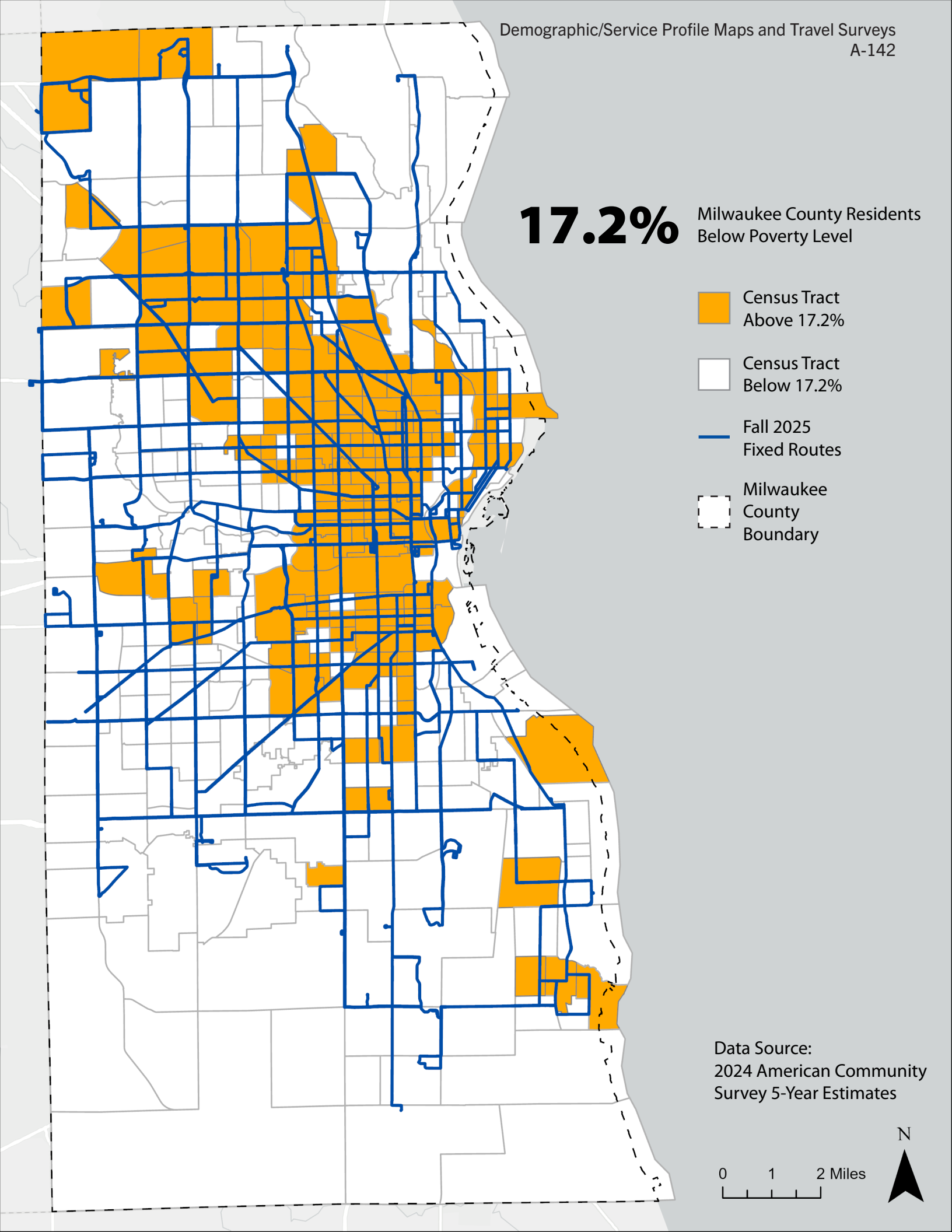
**Net Promoter Score (NPS) is a common metric for measuring customer satisfaction and loyalty by asking customers if they are willing to recommend the product/service to others. Respondents answer on a scale of 0 (not at all likely) to 10 (extremely likely). Respondents rating 9 or 10 are described as "Promoters" while respondents rating 0 through 6 are described as "Detractors". The NPS is calculated by subtracting the number of Detractors from Promoters. The higher the score, the higher the customer loyalty.*

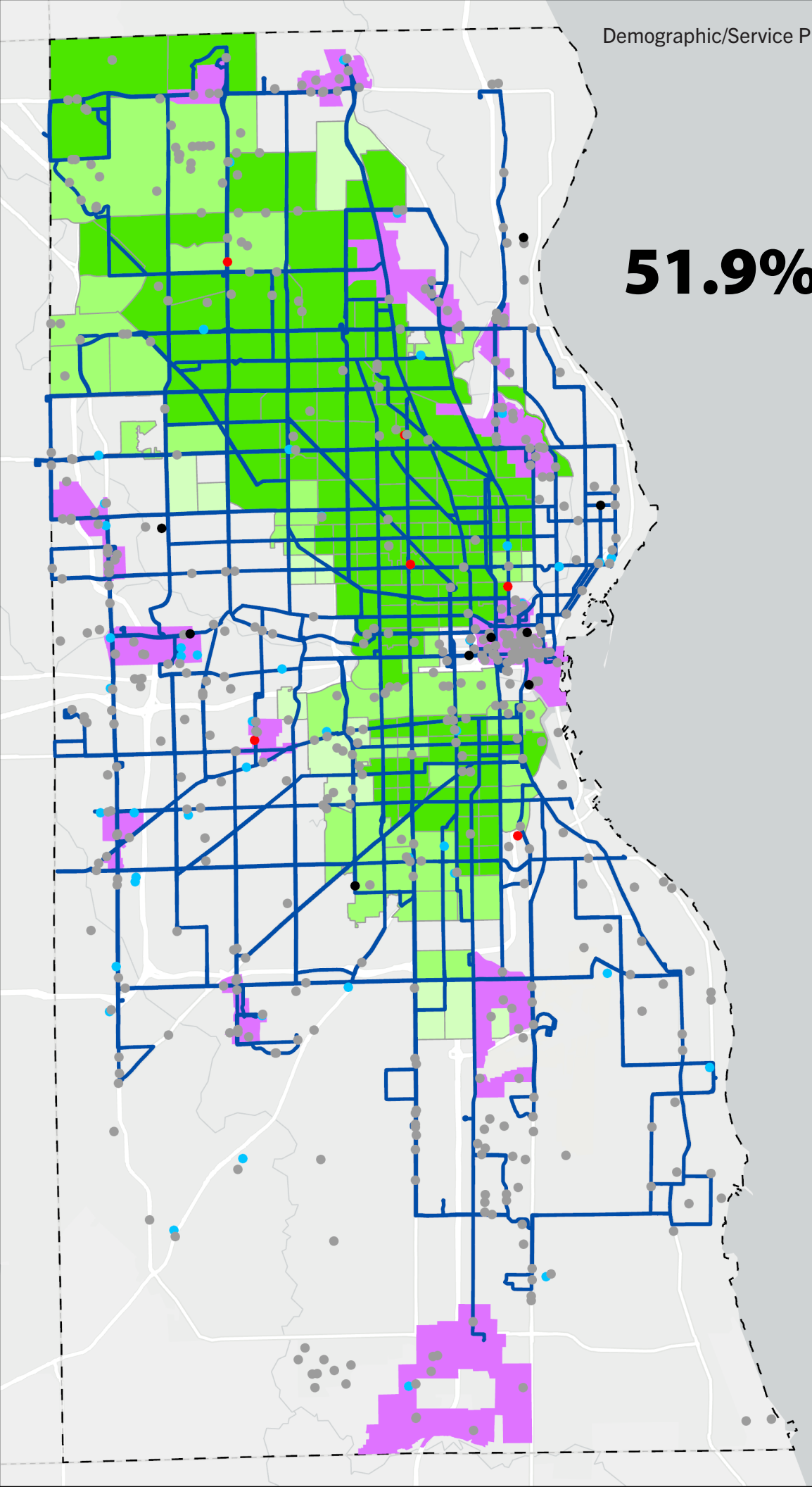
In thinking about bus drivers, please indicate whether MCTS meets your needs	2023	2024	2025
How bus drivers appear	n/a	n/a	93%
How safely they drive the bus	88%	87%	85%
How often they know the answers to people's questions	87%	84%	84%
How well the drivers accommodate passengers	86%	87%	82%
How friendly the drivers are	82%	81%	79%
How bus drivers never pass me by while waiting at the bus stop	n/a	71%	77%

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Please rate your agreement with the following statements	2023	2024	2025
I am concerned about the future of Milwaukee County's bus system	n/a	n/a	67%
The buses are consistently on time	n/a	n/a	52%
I often miss a bus transfer because buses are late	n/a	n/a	36%
I often see MCTS public safety officers or transit security officers when riding the bus	n/a	n/a	26%


51.9%
Milwaukee County Minority Residents
Census Tract Above 51.9%
Census Tract Below 51.9%
Fall 2025 Fixed Routes
Milwaukee County Boundary
Data Source:
2024 American Community Survey 5-Year Estimates
N
0
1
2 Miles


17.2%
Milwaukee County Residents Below Poverty Level
Census Tract Above 17.2%
Census Tract Below 17.2%
Fall 2025 Fixed Routes
Milwaukee County Boundary
Data Source:
2024 American Community Survey 5-Year Estimates
N
0
1
2 Miles



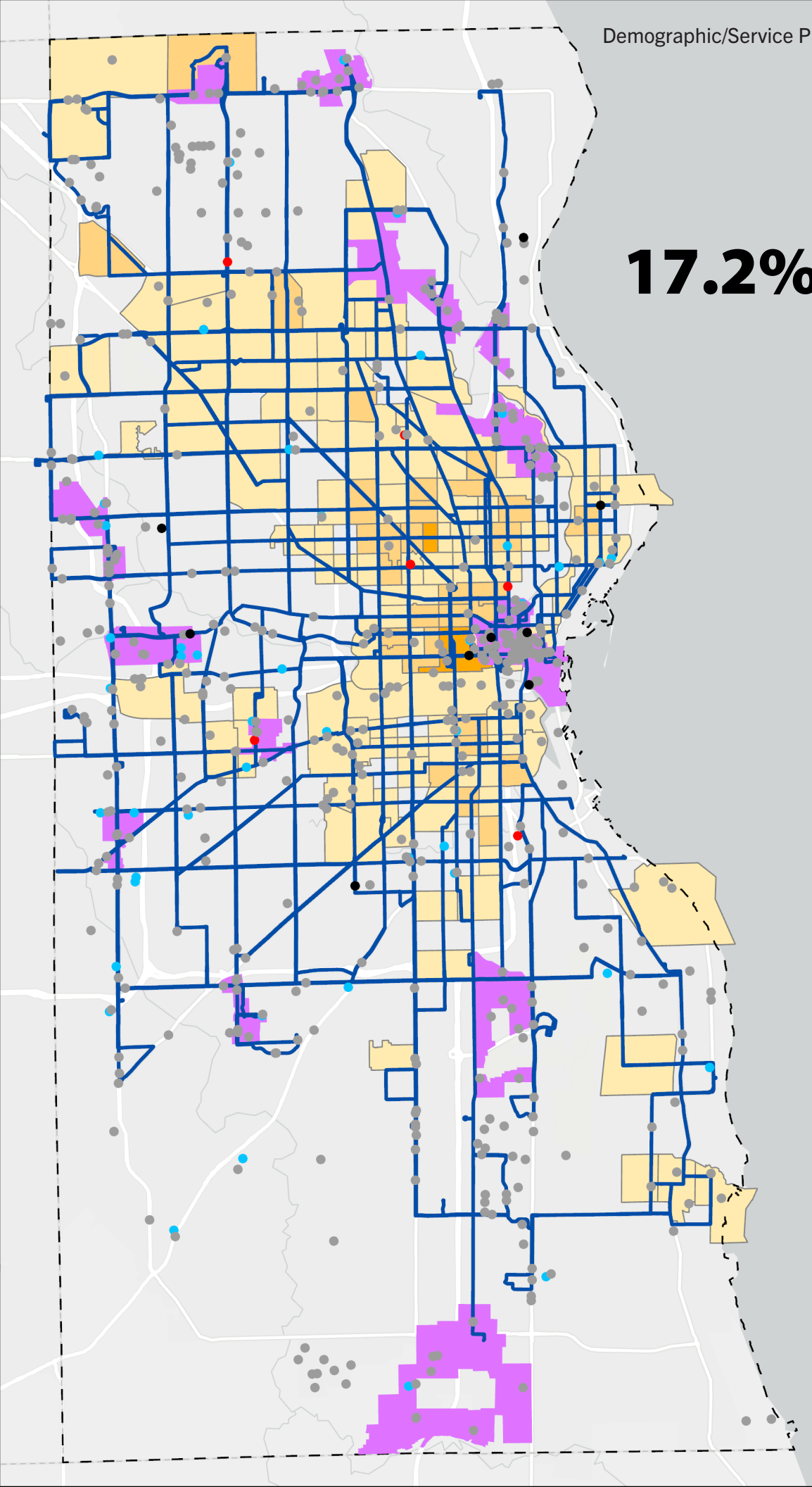
51.9% Milwaukee County Non-White Residents

- Non-White 81% to 100%
- Non-White 61% to 80%
- Non-White 51.9% to 60%
- Commercial Center
- Major Employer
- Job Resource Center
- Institution of Higher Education
- Hospital or Medical Center
- Fall 2025 Fixed Routes
- Milwaukee County Boundary

Data Source:
2024 American Community Survey 5-Year Estimates

N

0 1 2 Miles



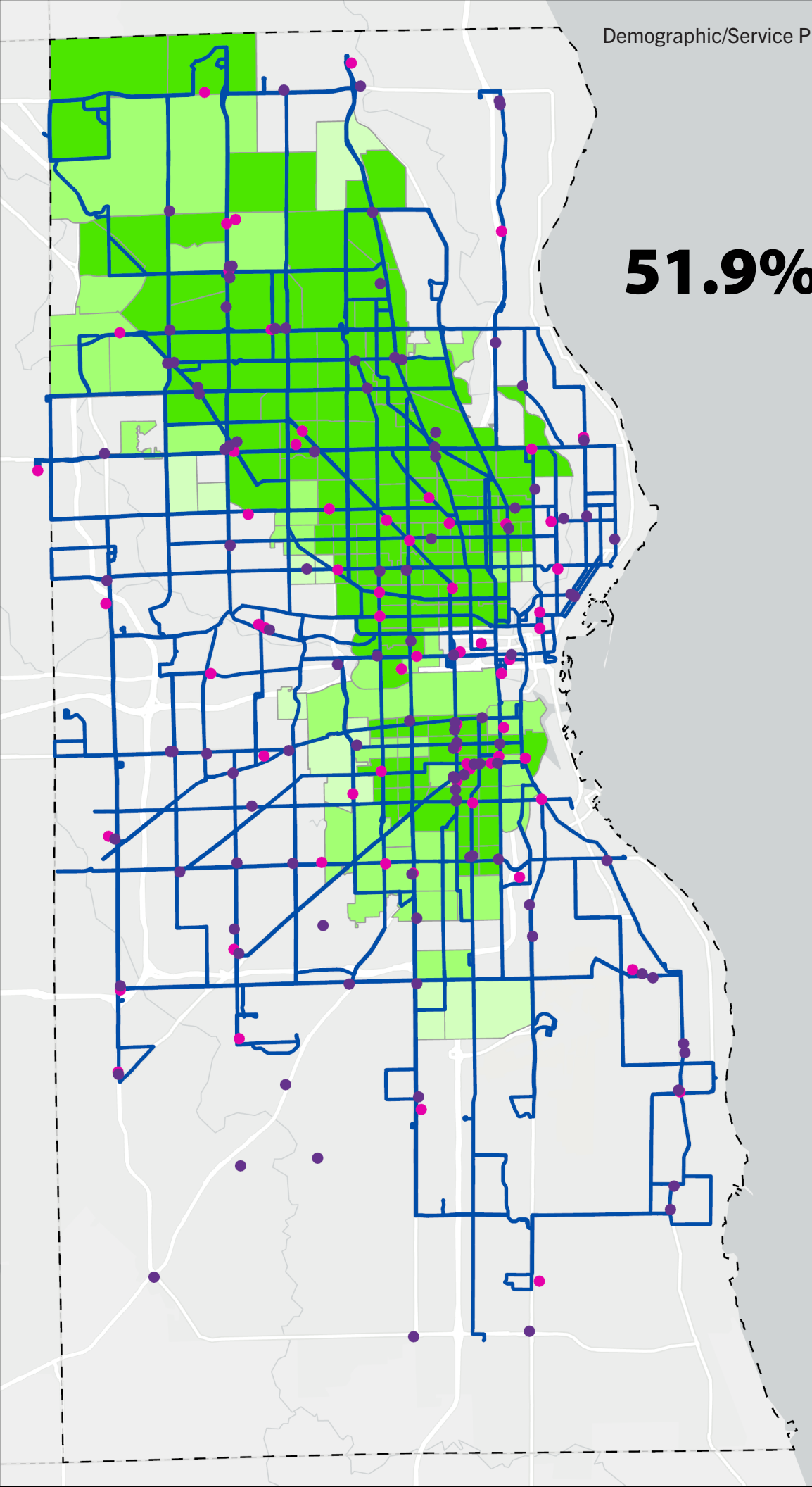
17.2% Milwaukee County Residents Below Poverty Level

- Below Poverty 61% to 100%
- Below Poverty 41% to 60%
- Below Poverty 17.2% to 40%
- Commercial Center
- Major Employer
- Job Resource Center
- Institution of Higher Education
- Hospital or Medical Center
- Fall 2025 Fixed Routes
- Milwaukee County Boundary

Data Source:
2024 American Community Survey 5-Year Estimates

N

0 1 2 Miles



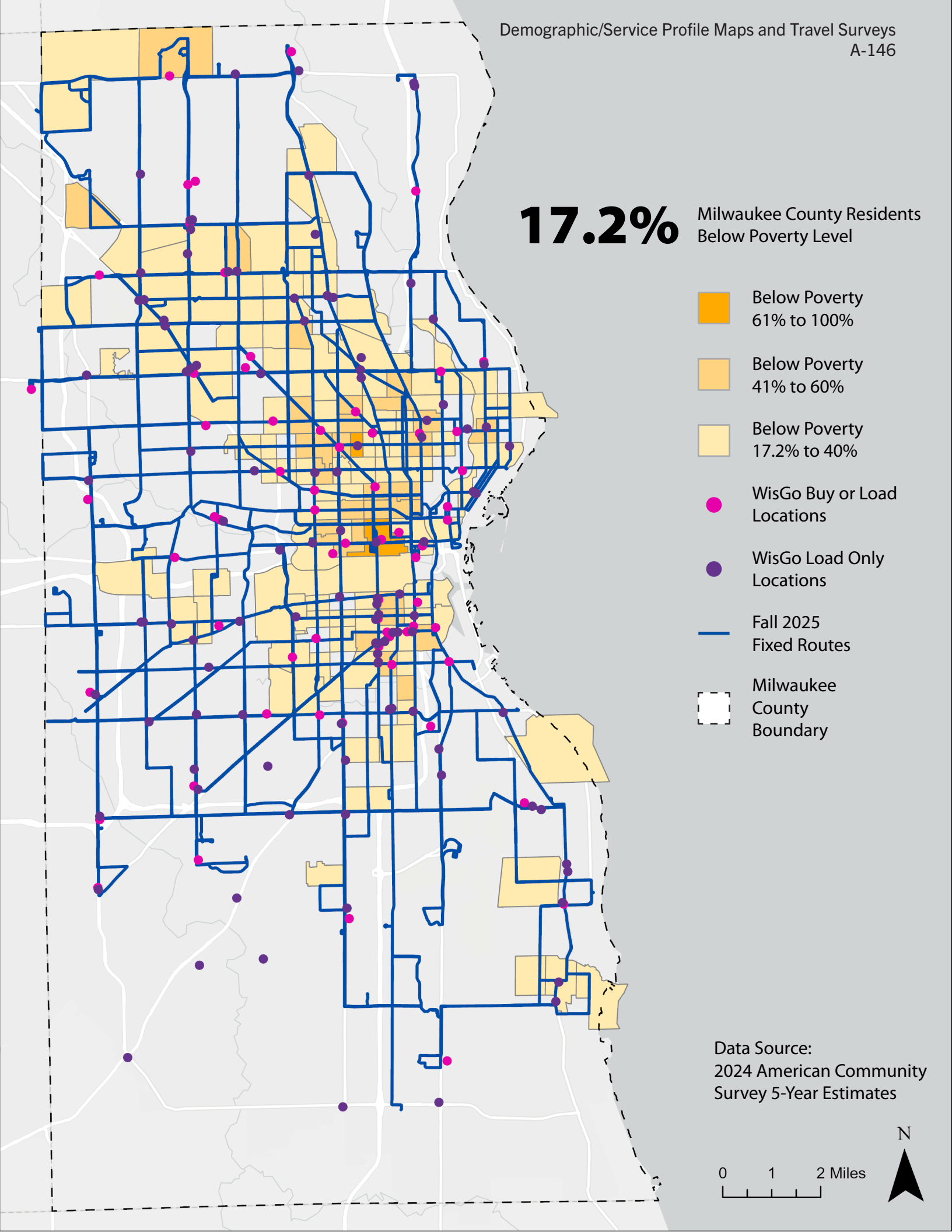
51.9% Milwaukee County Non-White Residents

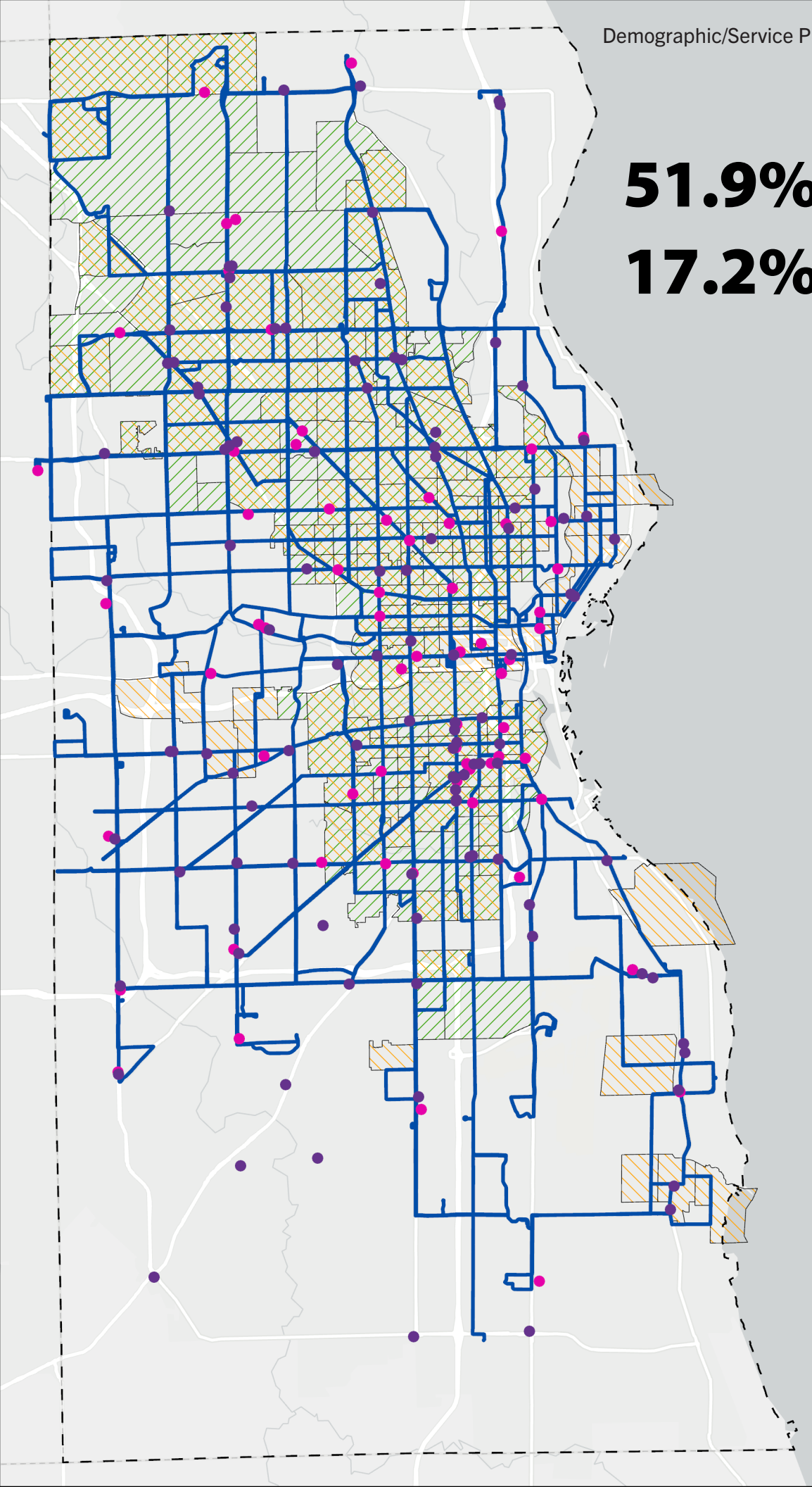
- Non-White 81% to 100%
- Non-White 61% to 80%
- Non-White 51.9% to 60%
- WisGo Buy or Load Locations
- WisGo Load Only Locations
- Fall 2025 Fixed Routes
- Milwaukee County Boundary

Data Source:
2024 American Community Survey 5-Year Estimates

N

0 1 2 Miles


17.2%
Milwaukee County Residents Below Poverty Level
Below Poverty 61% to 100%
Below Poverty 41% to 60%
Below Poverty 17.2% to 40%
WisGo Buy or Load Locations
WisGo Load Only Locations
Fall 2025 Fixed Routes
Milwaukee County Boundary
Data Source: 2024 American Community Survey 5-Year Estimates
N
0
1
2 Miles



51.9% Milwaukee County Minority Residents

17.2% Milwaukee County Residents Below Poverty Level

- Minority Residents above 51.9%
- Below Poverty above 17.2%
- WisGo Buy or Load Locations
- WisGo Load Only Locations
- Fall 2025 Fixed Routes
- Milwaukee County Boundary

Data Source:
2024 American Community Survey 5-Year Estimates

N

0 1 2 Miles

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Milwaukee County Transit System
Interoffice Communication

To: Tom Winter, Director of Service Development

From: Jesus Ochoa, Planning Manager

Subject: **Title VI Fare Equity Analysis of Proposed Fare cap Increases in 2025 Budget**

Date: November 1, 2024

BACKGROUND

MCTS would increase the fare cap threshold in the 2025 Budget for several pass types including daily, weekly and monthly passes for adult single rides and daily and monthly Paratransit rides. As required by FTA, MCTS conducted a Title VI Fare Equity Analysis to determine if a disparate impact for minority passengers or a disproportionate burden for low-income passengers would occur because of these changes.

Description of Fare Equity Analysis and Definitions

The basic steps in the fare equity analysis are as follows:

- Develop a disparate impact policy and a disproportionate burden policy with input from the public. MCTS currently has a fare equity policy in place in its Title VI program
- Examine fare use patterns for both minority riders and low-income riders (the percentage of riders for each fare type)
- Review of the current and proposed changes in fares
- Assess the impact of the proposed change in fares
- Determine if there is a finding of a disparate impact or disproportionate burden
- If necessary, examine alternatives or modify the proposal to mitigate the impact or burden

A disparate impact is “neutral policy or practice that disproportionately affects members of a protected class identified by race, color, or national origin.” It exists where a transit provider’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives, but with less disproportionate effect on the basis of race, color, or national origin. A disproportionate burden refers to “a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.”

Disparate Impact Policy and Disproportionate Burden Policy

MCTS uses the four-fifths rule as the threshold for measuring whether minority riders are bearing a disparate impact of adverse effects of a fare change or whether low-income riders are bearing a disproportionate burden of such a fare change. The four-fifth’s rule is a method of calculating how much one population group is impacted compared to its counterpart population group. Specifically, a disparate impact has occurred when the ratio of the reduction in service or the ratio of the percent

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change in fares in the minority group compared to the non-minority group is below four-fifths (0.80) or 80%. Similarly, a disproportionate burden has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the low-income group compared to the non-low-income group is below four-fifths.

MCTS used the following process to analyze the impact of an increase in fares and to determine if a disparate impact exists as a result:

1. Determine the percent usage for both minority and non-minority passengers for each fare type.
2. Compare the percent usage for both the minority group and the non-minority group to see which has the higher use for each fare type:
    a. If the percent usage by minority passengers is higher than for non-minority passengers, an impact ratio is calculated that is equal to the percent use by non-minority passengers divided by the percent use of minority passengers.
        i. If the ratio is less than 0.80, the 4/5ths rule threshold has been crossed and a disparate impact exists. If the ratio is greater than 0.80, a disparate impact does not exist.
    b. If the percent usage by minority passengers is lower than for non-minority passengers, the impact ratio is scored as 100%, i.e., the impact of the fare increase will be greater on non-minority passengers than on minority passengers.

The same process would be followed to determine if a disproportionate burden existed for persons with low incomes.

CURRENT AND PROPOSED FARES

Fare Type	Current Fare Cap	Proposed Fare Cap	Difference
Adult Single Ride	$ 2.00	$ 2.00	$ -
Daily Fare Cap	$ 4.00	$ 5.00	$ 1.00
Weekly Fare Cap	$ 19.50	$ 20.00	$ 0.50
Monthly Fare Cap	$ 72.00	$ 75.00	$ 3.00
Reduced Fare	$ 1.00	$ 1.00	$ -
Daily Fare Cap	$ 2.00	$ 2.50	$ 0.50
Weekly Fare Cap	$ 11.00	$ 11.00	$ -
Monthly Fare Cap	$ 32.00	$ 37.50	$ 5.50
Other Special Fares			
Student 7-Day Pass	$ 17.50	$ 17.50	$ -
U-Pass Semester Pass	$ 50.00	$ 50.00	$ -
Commuter Value Pass	$ 210.00	$ 210.00	$ -
Transit+ Pass	$ 1.00	$ 1.00	$ -
Daily Fare Cap	$ 2.00	$ 2.50	$ 0.50
Weekly Fare Cap	$ 11.00	$ 11.00	$ -
Monthly Fare Cap	$ 32.00	$ 37.50	$ 5.50
Umo Lite - 1 ride	$ 2.00	$ 2.00	$ -

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Mobile App Single Ride	$	2.00	$	2.00	$ -
Daily Fare Cap	$	4.00	$	5.00	$ 1.00
Weekly Fare Cap	$	19.50	$	20.00	$ 0.50
Monthly Fare Cap	$	72.00	$	75.00	$ 3.00

PROPORTIONATE SHARE OF MCTS RIDERSHIP BY MINORITY STATUS AND INCOME STATUS

To provide an overview of MCTS' ridership, an onboard survey of riders from 2023 showed that 70.5% of passengers are minorities while 29.5% are non-minorities. Additionally, 50.5% of passengers are low-income and 49.5% are non-low income.

Proportionate Share of MCTS Ridership by Minority Status and Income Status from SEWRPC On Board Survey

Category	Percent
Minority Passengers	70.5%
Non-Minority Passengers	29.5%
Category	**Percent**
Low-Income Passengers	50.5%
Non-Low-Income Passengers	49.5%

PROPORTIONATE SHARE OF MILWAUKEE COUNTY BY MINORITY STATUS AND INCOME STATUS

To offer a perspective of Milwaukee County's entire population, this data indicates that 51.5% of the county's population are minority residents while 48.5% are non-minority residents. Concurrently, the data also indicates that 17.1% of the county's population are low-income residents while 82.9% are non-low-income residents.

Proportionate Share of Milwaukee County by Minority Status and Income Status from the 2022 American Community Survey

Category	Percent
Minority Residents	51.5%
Non-Minority Residents	48.5%
Category	**Percent**
Low-Income Residents	17.1%
Non-Low-Income Residents	82.9%

ASSESSMENT OF THE PROPOSED FARE CAP INCREASE—MINORITY / NON-MINORITY PASSSENGERS

MCTS uses the four-fifths rule as the threshold for measuring whether minority riders are bearing a disparate impact of adverse effects of a fare change or whether low-income riders are bearing a disproportionate burden of such a fare change. The four-fifth's rule is a method of calculating how much one population group is impacted compared to its counterpart population group. Specifically, a

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disparate impact has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the minority group compared to the non-minority group is below four-fifths (0.80) or 80%. Similarly, a disproportionate burden has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the low-income group compared to the non-low-income group is below four-fifths.

Utilizing the same 2023 onboard survey of riders mentioned earlier, the following breakdown assesses whether any of the fare capping increases has a disparate impact on minority population or a disproportionate impact to low-income population respectively.

Based on MCTS' Four-Fifths rule, the data shows there is a disparate impact on minority riders using transit + pass payment as the impact ratio is below 0.80 for this fare payment type, but there is not a disparate impact on minority populations using the fare card or mobile app payments as the impact ratio is above 0.80.

Fare Payment Type	% Minority	% Non-Minority	Impact Ratio	Disparate Impact?
Fare Card	40.6%	35.7%	0.88	No
Mobile App	26%	32.8%	>1.00	No
Transit + Pass	0.2%	0.8%	.22	Yes

ASSESSMENT OF THE PROPOSED FARE CAP INCREASE—LOW-INCOME / NON-LOW-INCOME PASSSENGERS

Low-income passengers who use the mobile app for payment would not be disproportionately burdened by the proposed fare cap increases as the impact ratio is above 0.80, but low-income passengers that pay with a fare card or transit + pass would be disproportionately burdened by the proposed fare cap increase as the impact ratio is below 0.80.

Fare Payment Type	% Low Income	% Non-Low Income	Impact Ratio	Disproportionate Burden?
Fare Card	44.5%	33.3%	0.74	Yes
Mobile App	26.2%	39.3%	> 1.00	No
Transit + Pass	0.90%	0.10%	0.11	Yes

Requirement to Mitigate Disparate Impacts / Disproportionate Burdens

FTA requires transit systems that determine a finding of a disparate impact, or a disproportionate burden must take actions to minimize or mitigate the impact. As was noted, MCTS identified that a disparate impact would occur for minority passengers who use the transit + pass payment method. Additionally, it was identified that low-income passengers paying with a fare card or transit + pass would be disproportionately burdened by the proposed fare cap increase.

- MCTS will educate passengers, and the public of the fare cap threshold increases prior to the

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changes taking effect on January 1st, 2025, and through the first quarter of 2025 including the following:

- The new thresholds still provide the lowest cost for riders daily, weekly and monthly compared to paying for every individual ride without fare capping. When compared to our peer agencies, the new threshold of $20 for the weekly cap is still less than our peer agency average of $23. The new monthly cap threshold is in line with peer agency monthly pass costs at $75.

CONCLUSIONS

The results show low-income riders paying with a fare card or transit + pass would be disproportionately burdened by the proposed fare cap increase. Additionally, a disparate impact would occur to minority riders using transit + pass payments. Although the increased fare cap thresholds result in impacts, the new thresholds still provide the lowest cost for riders daily, weekly and monthly compared to paying for every individual ride without fare capping. MCTS will educate the public on the increase of the cap threshold before the changes take effect on January 1st, 2025 and through the first quarter of 2025.

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Milwaukee County Transit System
Interoffice Communication

To: Tom Winter, Director of Service Development

From: Jesus Ochoa, Planning Manager

Subject: **Title VI Fare Equity Analysis of Proposed Fare & Fare Cap Increases in 2026 Budget**

Date: October 1, 2025

BACKGROUND
MCTS would raise regular and reduced fares, as well as fare-capping thresholds, for single-ride, daily, weekly, and monthly passes in the 2026 budget. Bus fares have not increased since 2007 and the change would keep MCTS in line with peer agency averages. As required by FTA, MCTS conducted a Title VI Fare Equity Analysis to determine if a disparate impact for minority passengers or a disproportionate burden for low-income passengers would occur because of these changes.

Description of Fare Equity Analysis and Definitions

The basic steps in the fare equity analysis are as follows:

- Develop a disparate impact policy and a disproportionate burden policy with input from the public. MCTS currently has a fare equity policy in place in its Title VI program
- Examine fare use patterns for both minority riders and low-income riders (the percentage of riders for each fare type)
- Review of the current and proposed changes in fares
- Assess the impact of the proposed change in fares
- Determine if there is a finding of a disparate impact or disproportionate burden
- If necessary, examine alternatives or modify the proposal to mitigate the impact or burden

A disparate impact is “neutral policy or practice that disproportionately affects members of a protected class identified by race, color, or national origin.” It exists where a transit provider’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives, but with less disproportionate effect on the basis of race, color, or national origin. A disproportionate burden refers to “a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.”

Disparate Impact Policy and Disproportionate Burden Policy
MCTS uses the four-fifths rule as the threshold for measuring whether minority riders are bearing a disparate impact of adverse effects of a fare change or whether low-income riders are bearing a disproportionate burden of such a fare change. The four-fifth’s rule is a method of calculating how much one population group is impacted compared to its counterpart population group. Specifically, a disparate impact has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the minority group compared to the non-minority group is below four-fifths (0.80) or

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80%. Similarly, a disproportionate burden has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the low-income group compared to the non-low-income group is below four-fifths.

MCTS used the following process to analyze the impact of an increase in fares and to determine if a disparate impact exists as a result:

1. Determine the percent usage for both minority and non-minority passengers for each fare type.
2. Compare the percent usage for both the minority group and the non-minority group to see which has the higher use for each fare type:
    a. If the percent usage by minority passengers is higher than for non-minority passengers, an impact ratio is calculated that is equal to the percent use by non-minority passengers divided by the percent use of minority passengers.
        i. If the ratio is less than 0.80, the 4/5ths rule threshold has been crossed and a disparate impact exists. If the ratio is greater than 0.80, a disparate impact does not exist.
    b. If the percent usage by minority passengers is lower than for non-minority passengers, the impact ratio is scored as 100%, i.e., the impact of the fare increase will be greater on non-minority passengers than on minority passengers.

The same process would be followed to determine if a disproportionate burden existed for persons with low incomes.

CURRENT AND PROPOSED FARES

Fare Type	Current Fare	Proposed Fare	Difference
Cash Fares			
Adult	$2.00	$2.75	$0.75
Reduced Fare	$1.00	$1.25	$0.25
Stored Value Fares			
Adult Single Ride	$2.00	$2.75	$0.75
Adult Daily Cap	$5.00	$8.25	$3.25
Adult Weekly Cap	$20.00	$33.00	$13.00
Adult Monthly Cap	$75.00	$99.00	$24.00
Adult Single Ride - Reduced Fare	$1.00	$1.25	$0.25
Adult Daily Cap - Reduced Fare	$2.50	$4.00	$1.50
Adult Weekly Cap - Reduced Fare	$11.00	$16.50	$5.50
Adult Monthly Cap - Reduced Fare	$37.50	$49.50	$12.00
Passes			
Student 7- Day Pass	$17.50	$17.50	$0.00
U-Pass Semester Pass	$50.00	$50.00	$0.00
Commuter Value Pass (Quarterly)	$210.00	$210.00	$0.00

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Other Special Fares			
Umo Lite - 1 ride	$2.00	$2.75	$0.75
Paratransit Fare	$4.00	$4.00	$0.00
Paratransit Agency Fare	$35.00	$35.00	$0.00

PROPORTIONATE SHARE OF MCTS RIDERSHIP BY MINORITY STATUS AND INCOME STATUS

To provide an overview of MCTS' ridership, an onboard survey of riders from 2023 showed that 70.5% of passengers are minorities while 29.5% are non-minorities. Additionally, 50.5% of passengers are low-income and 49.5% are non-low income.

Proportionate Share of MCTS Ridership by Minority Status and Income Status from SEWRPC On Board Survey

Category	Percent
Minority Passengers	70.5%
Non-Minority Passengers	29.5%
Category	**Percent**
Low-Income Passengers	50.5%
Non-Low-Income Passengers	49.5%

PROPORTIONATE SHARE OF MILWAUKEE COUNTY BY MINORITY STATUS AND INCOME STATUS

To offer a perspective of Milwaukee County's entire population, this data indicates that 49.5% of the county's population are minority residents while 50.5% are non-minority residents. Concurrently, the data also indicates that 17.2% of the county's population are low-income residents while 82.8% are non-low-income residents.

Proportionate Share of Milwaukee County by Minority Status and Income Status from the 2024 American Community Survey

Category	Percent
Minority Residents	49.5%
Non-Minority Residents	50.5%
Category	**Percent**
Low-Income Residents	17.2%
Non-Low-Income Residents	82.8%

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ASSESSMENT OF THE PROPOSED FARE & FARE CAP INCREASE—MINORITY / NON-MINORITY PASSSENGERS

Utilizing the same 2023 onboard survey of riders mentioned earlier, the following breakdown assesses whether the fare or any of the fare capping increases has a disparate impact on minority population or a disproportionate impact to low-income population respectively.

Based on MCTS' Four-Fifths rule, the data shows there is a disparate impact on minority riders using cash payment as the impact ratio is below 0.80 for this fare payment type, but there is not a disparate impact on minority populations using the fare card or mobile app payments as the impact ratio is above 0.80.

Fare Payment Type	% Minority	% Non-Minority	Impact Ratio	Disparate Impact?
Cash	16.9 %	7.28%	0.43	Yes
Fare Card	40.6%	35.7%	0.88	No
Mobile App	26%	32.8%	>1.00	No

ASSESSMENT OF THE PROPOSED FARE & FARE CAP INCREASE—LOW-INCOME / NON-LOW-INCOME PASSSENGERS

Low-income passengers who use the mobile app for payment would not be disproportionately burdened by the proposed fare cap increases as the impact ratio is above 0.80, but low-income passengers that pay with a fare card or cash would be disproportionately burdened by the proposed fare cap increase as the impact ratio is below 0.80.

Fare Payment Type	% Low Income	% Non-Low Income	Impact Ratio	Disproportionate Burden?
Cash	13.8 %	6.92%	0.50	Yes
Fare Card	44.5%	33.3%	0.74	Yes
Mobile App	26.2%	39.3%	> 1.00	No

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Requirement to Mitigate Disparate Impacts / Disproportionate Burdens

FTA requires transit systems that determine a finding of a disparate impact, or a disproportionate burden must take actions to minimize or mitigate the impact. As was noted, MCTS identified that a disparate impact would occur for minority passengers who use cash payment method. Additionally, it was identified that low-income passengers paying with a fare card or cash would be disproportionately burdened by the proposed fare & cap increase.

- As part of the budget process, MCTS will educate passengers, and the public of the fare cap threshold increases prior to the changes taking effect on January 1st, 2026 including:
    - Bus fares have not increased since 2007 and the increase would keep MCTS in line with peer agency averages in 2026.
    - The new fare cap thresholds still provide the lowest cost for riders daily, weekly and monthly compared to paying for every individual ride without fare capping even at the former rate of $2 per ride.
- Onboard bus audio and MCTS website detailing information about the upcoming changes will be implemented leading up to the start-date of January 1st, 2026.

CONCLUSIONS

MCTS would raise regular and reduced fares, as well as fare-capping thresholds, for single-ride, daily, weekly, and monthly passes in the 2026 budget. Bus fares have not increased since 2007 and the change would keep MCTS in line with peer agency averages.

The results show low-income riders paying with a fare card or transit + pass would be disproportionately burdened by the proposed fare cap increase. Additionally, a disparate impact would occur to minority riders using transit + pass payments. Although the increased fare cap thresholds result in impacts, the new thresholds still provide the lowest cost for riders daily, weekly and monthly compared to paying for every individual ride without fare capping. MCTS will educate the public on the increase of the cap threshold before the changes take effect on January 1st, 2026.

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Interoffice Communication

To: Tom Winter, Director of Service Development

From: Jesus Ochoa, Planning Manager

Subject: **Title VI Fare Equity Analysis of Introducing Contactless Payments Options**

Date: October 1, 2025

BACKGROUND

MCTS will introduce contactless payment in April 2026, allowing customers to pay with contactless credit or debit cards, or mobile wallets such as Apple Pay and Google Pay. Riders will tap their card or device on the validator, similar to using a WisGo Card or the UMO app. Regular and reduced fares will apply to all contactless payments. Fare capping will also apply, but riders must use the same card or device for all trips to qualify. Contactless fares will include the standard transfer window, allowing continued travel within the allotted time without an additional charge. Note that fare and fare capping rates will increase in 2026, as shown in later tables and detailed in the separate Fare Equity Analysis.

As required by the FTA, MCTS completed a Title VI Fare Equity Analysis to determine whether these changes create a disparate impact on minority riders or a disproportionate burden on low-income riders.

Description of Fare Equity Analysis and Definitions

The basic steps in the fare equity analysis are as follows:

- Develop a disparate impact policy and a disproportionate burden policy with input from the public. MCTS currently has a fare equity policy in place in its Title VI program
- Examine fare use patterns for both minority riders and low-income riders (the percentage of riders for each fare type)
- Review of the current and proposed changes in fares or media type
- Assess the impact of the proposed change in fares or media type
- Determine if there is a finding of a disparate impact or disproportionate burden
- If necessary, examine alternatives or modify the proposal to mitigate the impact or burden

A disparate impact is “neutral policy or practice that disproportionately affects members of a protected class identified by race, color, or national origin.” It exists where a transit provider’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives, but with less disproportionate effect on the basis of race, color, or national origin. A disproportionate burden refers to “a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.”

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Disparate Impact Policy and Disproportionate Burden Policy

MCTS uses the four-fifths rule as the threshold for measuring whether minority riders are bearing a disparate impact of adverse effects of a fare change or whether low-income riders are bearing a disproportionate burden of such a fare change. The four-fifth's rule is a method of calculating how much one population group is impacted compared to its counterpart population group. Specifically, a disparate impact has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the minority group compared to the non-minority group is below four-fifths (0.80) or 80%. Similarly, a disproportionate burden has occurred when the ratio of the reduction in service or the ratio of the percent change in fares in the low-income group compared to the non-low-income group is below four-fifths.

MCTS used the following process to analyze the impact of an increase in fares and to determine if a disparate impact exists as a result:

1. Determine the percent usage for both minority and non-minority passengers for each fare type.
2. Compare the percent usage for both the minority group and the non-minority group to see which has the higher use for each fare type:
    a. If the percent usage by minority passengers is higher than for non-minority passengers, an impact ratio is calculated that is equal to the percent use by non-minority passengers divided by the percent use of minority passengers.
        i. If the ratio is less than 0.80, the 4/5ths rule threshold has been crossed and a disparate impact exists. If the ratio is greater than 0.80, a disparate impact does not exist.
    b. If the percent usage by minority passengers is lower than for non-minority passengers, the impact ratio is scored as 100%, i.e., the impact of the fare increase will be greater on non-minority passengers than on minority passengers.

The same process would be followed to determine if a disproportionate burden existed for persons with low incomes.

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CURRENT AND PROPOSED FARES

Fare Type	Current Fare	Proposed Fare	Difference
Cash Fares			
Adult	$2.00	$2.75	$0.75
Reduced Fare	$1.00	$1.25	$0.25
Stored Value Fares			
Adult Single Ride	$2.00	$2.75	$0.75
Adult Daily Cap	$5.00	$8.25	$3.25
Adult Weekly Cap	$20.00	$33.00	$13.00
Adult Monthly Cap	$75.00	$99.00	$24.00
Adult Single Ride - Reduced Fare	$1.00	$1.25	$0.25
Adult Daily Cap - Reduced Fare	$2.50	$4.00	$1.50
Adult Weekly Cap - Reduced Fare	$11.00	$16.50	$5.50
Adult Monthly Cap - Reduced Fare	$37.50	$49.50	$12.00
Passes			
Student 7- Day Pass	$17.50	$17.50	$0.00
U-Pass Semester Pass	$50.00	$50.00	$0.00
Commuter Value Pass (Quarterly)	$210.00	$210.00	$0.00
Other Special Fares			
Umo Lite - 1 ride	$2.00	$2.75	$0.75
Paratransit Fare	$4.00	$4.00	$0.00
Paratransit Agency Fare	$35.00	$35.00	$0.00

PROPORTIONATE SHARE OF MCTS RIDERSHIP BY MINORITY STATUS AND INCOME STATUS

To provide an overview of MCTS' ridership, an onboard survey of riders from 2023 showed that 70.5% of passengers are minorities while 29.5% are non-minorities. Additionally, 50.5% of passengers are low-income and 49.5% are non-low income.

Proportionate Share of MCTS Ridership by Minority Status and Income Status from SEWRPC On Board Survey

Category	Percent
Minority Passengers	70.5%
Non-Minority Passengers	29.5%
Category	**Percent**
Low-Income Passengers	50.5%
Non-Low-Income Passengers	49.5%

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PROPORTIONATE SHARE OF MILWAUKEE COUNTY BY MINORITY STATUS AND INCOME STATUS

To offer a perspective of Milwaukee County's entire population, this data indicates that 50.6% of the county's population are minority residents while 49.4% are non-minority residents. Concurrently, the data also indicates that 16.6% of the county's population are low-income residents while 83.4% are non-low-income residents.

Proportionate Share of Milwaukee County by Minority Status and Income Status from the 2024 American Community Survey

Category	Percent
Minority Residents	50.6%
Non-Minority Residents	49.4%
Category	**Percent**
Low-Income Residents	16.6%
Non-Low-Income Residents	83.4%

ASSESSMENT OF INTRODUCING CONTACTLESS PAYMENTS—MINORITY / NON-MINORITY PASSSENGERS

Utilizing the same 2023 onboard survey of riders mentioned earlier, the following breakdown assesses whether introducing contactless payments has a disparate impact on minority population or a disproportionate impact to low-income population respectively. Since this change is adding an additional option and not replacing current payment options, we assessed similar payment data to inform mitigation efforts as needed.

Based on MCTS' Four-Fifths rule, the data shows there is a disparate impact on minority riders using cash payment as the impact ratio is below 0.80 for this fare payment type, but there is not a disparate impact on minority populations that traditionally use the fare card or mobile app payments as the impact ratio is above 0.80.

Fare Payment Type	% Minority	% Non-Minority	Impact Ratio	Disparate Impact?
Cash	16.9 %	7.28%	0.43	Yes
Fare Card	40.6%	35.7%	0.88	No
Mobile App	26%	32.8%	>1.00	No

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ASSESSMENT OF INTRODUCING CONTACTLESS PAYMENTS LOW-INCOME / NON-LOW-INCOME PASSSENGERS

Low-income passengers who traditionally use the mobile app for payment would not be disproportionately burdened by introducing contactless payment options as the impact ratio is above 0.80, but low-income passengers that traditionally pay with a fare card or cash could be disproportionately burdened as the impact ratio is below 0.80.

Fare Payment Type	% Low Income	% Non-Low Income	Impact Ratio	Disproportionate Burden?
Cash	13.8 %	6.92%	0.50	Yes
Fare Card	44.5%	33.3%	0.74	Yes
Mobile App	26.2%	39.3%	> 1.00	No

Conclusions & Requirement to Mitigate Disparate Impacts / Disproportionate Burdens

FTA requires transit systems that determine a finding of a disparate impact, or a disproportionate burden must take actions to minimize or mitigate the impact. As was noted, MCTS identified that introducing contactless payments will not replace current payment options and will follow the same fare and fare capping structure as existing payment options and available on every bus and station in the network. Introducing contactless payments provides customers with more options. As the launch of contactless payments in April 2026 nears:

- MCTS will update its fare webpage, and print materials to educate passengers, and the public on the new payment option prior to the changes taking effect including:
    - Fares and fare capping, how contactless payments work, types of accepted cards among other FAQs.
- Onboard bus audio and press releases detailing information about the upcoming changes will be implemented leading up to the start-date in April 2026.
- In future onboard surveys, MCTS staff will Include contactless payment options questions to provide population of ridership share data for assessment purposes in future equity analyses.

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Milwaukee County Transit System

Interoffice Memorandum

TO: File

FROM: Natalie Marshall, Transit Planner

SUBJECT: SAFE Analysis – Addition of Howard Fuller Academy Route 1 (HF1)

DATE: July 15, 2024

The addition of Howard Fuller Route 1 service meets the definition of a major service change and, per FTA rules, requires MCTS to prepare a Service and Fare Equity Analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable.

BACKGROUND

Howard Fuller Academy Route 1 (see Figure 1) was created to serve students of the new Howard Fuller Collegiate Academy location on N Vel R. Phillips Ave/N Dr. MLK Jr Drive & W North Ave. It follows portions of existing routes 58, 11, 19, 12, and 21 by running from Villard and Hopkins down Villard, Green Bay, Hampton, Atkinson, Teutonia, and North Ave to drop students off at Howard Fuller Collegiate Academy. HF1 will operate two trips on weekdays: one southbound in the morning to drop students off and one northbound in the afternoon to pick students up from school, totaling approximately 2 in-service hours per weekday.

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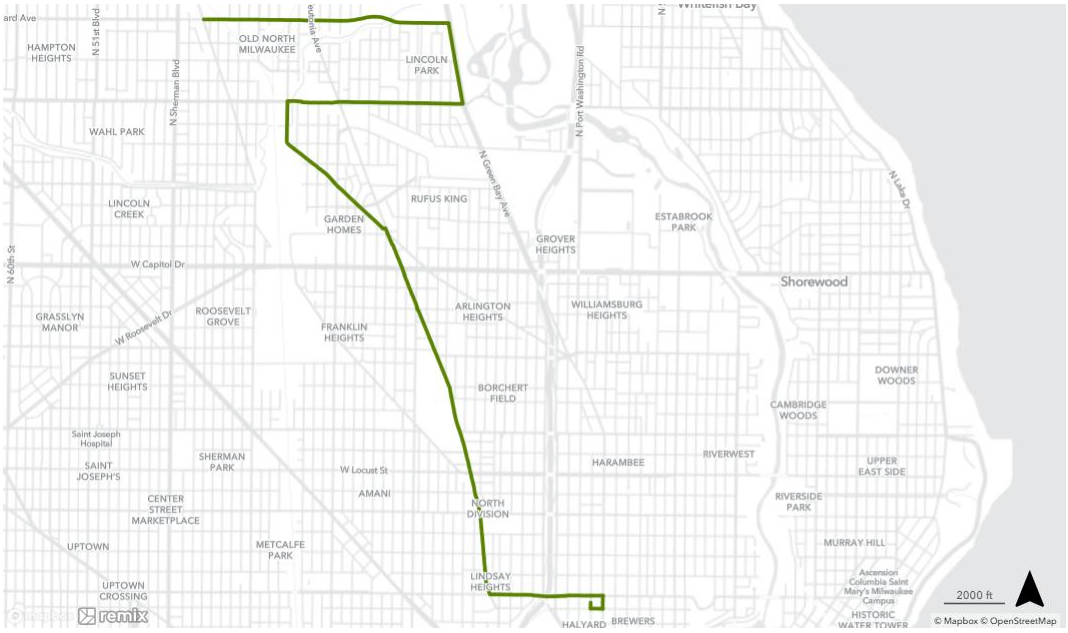


Figure 1

DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

This determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the American Community Survey 2022 1-year estimates, the percentage of the Milwaukee County population that identifies as a minority race (non-white, non-Hispanic) is 51.5% while the percentage of Milwaukee County's population that is low-income (income in the past 12 months below the poverty level) is 17.1%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of the annual assessment of compliance required by the FTA, MCTS categorizes routes as "minority" and "non-minority" according to whether one-third of the route's mileage travels within minority census tracts. A census tract is considered "minority" if the percentage of minority residents exceeds the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of HF1 revealed that the route travels entirely through minority and low-income Census Tracts. (Map 2). Therefore, the benefits of increased service will be provided exclusively to these communities, and the 4/5ths rule threshold has not been crossed and a disparate impact does not exist (see Table 1).

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Table 1				
	Trips Before	**Trips After**	**4/5ths Rule**	
Low Income	0	2	100%	+100%
Non-Low Income	0	0	0%	0%
Minority	0	2	100%	+100%
Non-Minority	0	0	0%	0%
Total	0	2	100%	+100%

SUMMARY

- The addition of this service meets the threshold of a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur.
- HF1 is considered both a minority and low-income route, and therefore could have a disparate impact on the minority population or a disproportionate burden on the low-income population.
- This change is an improvement of service, and therefore must not benefit non-minority and non-low-income populations more than minority and low-income populations.
- All service improvements will occur within minority and low-income Census Tracts; therefore, disparate impact does not exist.

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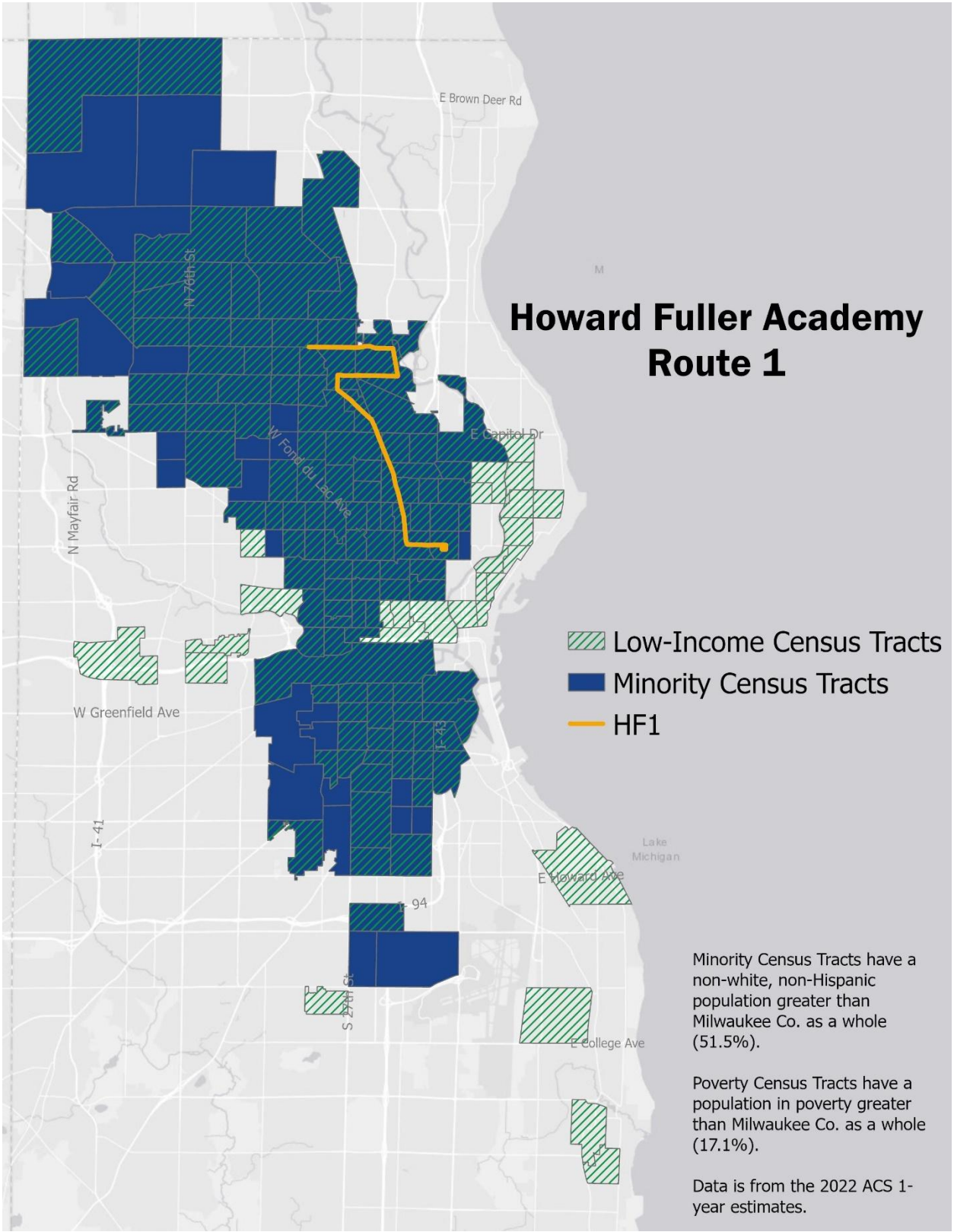


Figure 2

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Milwaukee County Transit System

Interoffice Memorandum

TO: File

FROM: Tom Bertrand, Transit Planner

SUBJECT: SAFE Analysis – Addition of Howard Fuller Academy Route 2 (HF2)

DATE: July 23rd, 2024

The addition of Howard Fuller Route 2 service meets the definition of a major service change and, per FTA rules, requires MCTS to prepare a Service and Fare Equity Analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable.

BACKGROUND

Howard Fuller Academy Route 2 (see Figure 1) was created to serve students of the new Howard Fuller Collegiate Academy location on N Vel R. Phillips Ave/N Dr. MLK Jr Drive & W North Ave. It follows portions of existing routes BLU, 21 & 30 by running from Sherman and Silver Spring down Sherman, Fond du Lac and North Ave to drop students off at Howard Fuller Collegiate Academy. HF2 will operate two trips on weekdays: one southbound in the morning to drop students off and one northbound in the afternoon to pick students up from school, totaling approximately 2 in-service hours per weekday.

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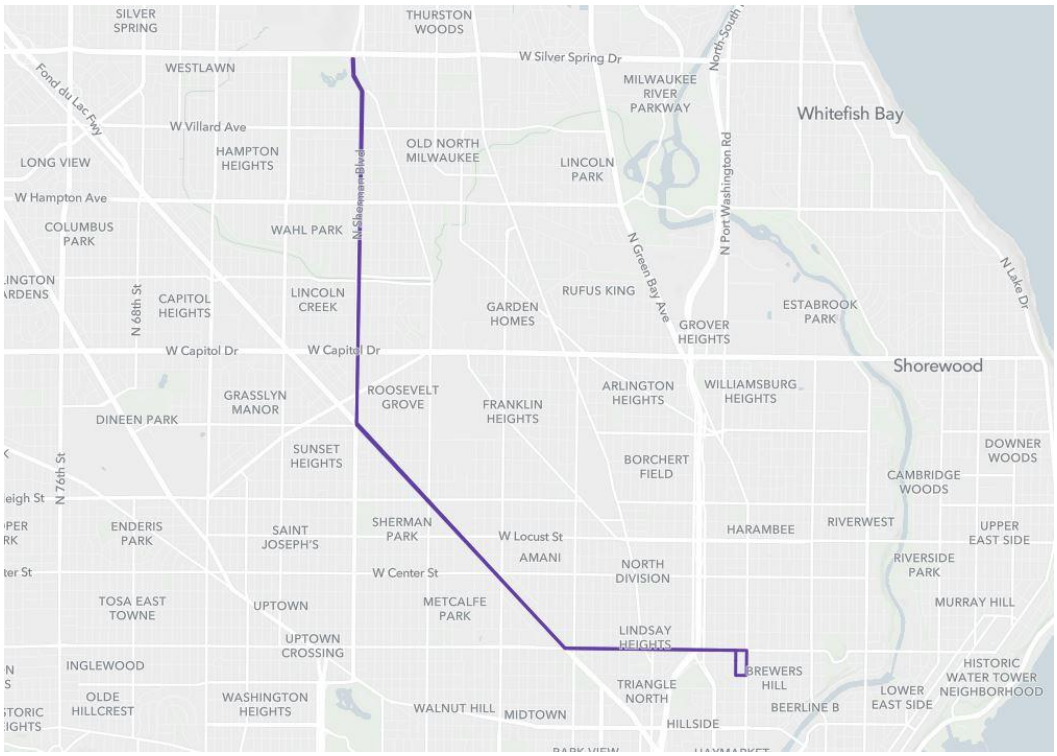


Figure 1

DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

This determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the American Community Survey 2022 1-year estimates, the percentage of the Milwaukee County population that identifies as a minority race (non-white, non-Hispanic) is 51.5% while the percentage of Milwaukee County's population that is low-income (income in the past 12 months below the poverty level) is 17.1%. The majority of both populations reside on the northwest side and near south side of Milwaukee County (Maps 2 and 3).

As a part of the annual assessment of compliance required by the FTA, MCTS categorizes routes as "minority" and "non-minority" according to whether one-third of the route's mileage travels within minority census tracts. A census tract is considered "minority" if the percentage of minority residents exceeds the countywide average. The same methodology was followed for the low-income population.

A GIS analysis of HF2 revealed that the route travels entirely through minority and low-income Census Tracts. (Map 2). Therefore, the benefits of increased service will be provided exclusively to these communities, and the 4/5ths rule threshold has not been crossed and a disparate impact does not exist (see Table 1).

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Table 1				
	Trips Before	**Trips After**	**4/5ths Rule**	
Low Income	0	2	100%	+100%
Non-Low Income	0	0	0%	0%
Minority	0	2	100%	+100%
Non-Minority	0	0	0%	0%
Total	0	2	100%	+100%

SUMMARY

- The addition of this service meets the threshold of a major service change and requires that MCTS perform a Service and Fare Equity analysis to determine if a disparate impact or disproportionate burden would occur.
- HF2 is considered both a minority and low-income route, and therefore could have a disparate impact on the minority population or a disproportionate burden on the low-income population.
- This change is an improvement of service, and therefore must not benefit non-minority and non-low-income populations more than minority and low-income populations.
- All service improvements will occur within minority and low-income Census Tracts; therefore, disparate impact does not exist.

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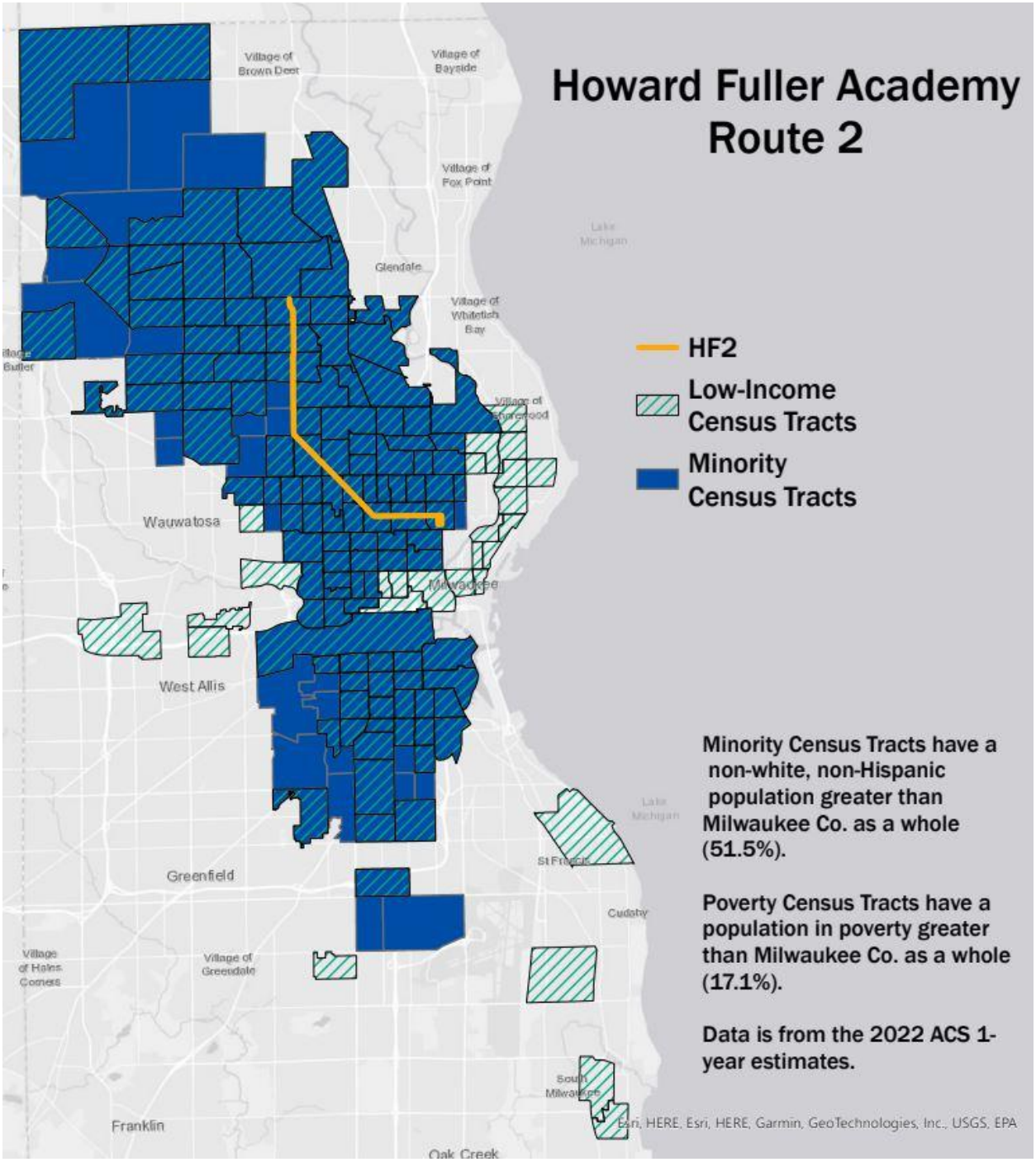


Figure 2

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Milwaukee County Transit System
Interoffice Memorandum

TO: File

FROM: Tom Bertrand, Transit Planner

SUBJECT: SAFE Analysis – MCTS MOVE 2025

DATE: June 9th, 2025

MCTS MOVE 2025 meets the definition of a major service change and, per FTA rules, requires MCTS to prepare a Service and Fare Equity Analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable.

BACKGROUND

MOVE 2025 is aimed at gathering feedback from riders, bus operators, and the public on proposed route and schedule changes through an extensive public outreach campaign, leading to a modified route network that better serves their needs as well as that of the overall community. Project goals are to increase ridership, improve the rider's experience, and advance racial equity. Service expansions will be balanced through improved efficiencies based on a review of ridership and productivity throughout the system. A major goal of MOVE is to improve service without increasing costs- despite some significant changes to routes in the system, the overall amount of service provided and resources used in our system will remain relatively the same as it is today.

The four main types of service changes include:

- Frequency increases
- New routes
- Route extensions and new connections
- Service reductions

See Map 1 for further detail in overall impacts. The changes proposed for MOVE 2025 are as follows: Route 14 extended to 16th Street. Route 19 modified to use McKinley Avenue between MLK Drive and 6th Street. Route 19 also ending at Zellman Court, with a new Route 82 taking over service between Zellman Court and Centennial Drive. Route 20 shortened to Layton Avenue. Route 28 modified to use Lovers Lane and Silver Spring on the northern end. Route 30 modified to operate on Florist Avenue to Teutonia Avenue. Route 51 to no longer serve Lake Drive. Route 52 extended to Chicago & Drexel. Route 55 to end at Packard Avenue. Route 56 extended to Beloit Road and 92nd Street. Routes 57 and 63 become higher frequency. Route 58 shortened to end at Appleton Avenue with a bus removed. New Route 59 to travel along Drexel Avenue between Walmart on 27th and Chicago/Drexel. BlueLine to end at 76th & Mill Road, with new Route 73 traveling between Teutonia Avenue and 107th Street primarily using Mill Road. PurpleLine shortened to end at the Walmart on 27th. RedLine to travel on Oakland Avenue to UWM. Route 68 extended to UWM via Capitol Drive and Downer Avenue.

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Map 1



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TITLE VI GUIDELINES / THRESHOLD

MCTS Title VI guidelines require any service change be examined to determine if it meets the definitions of "major service change". A major service change is confirmed if any of five measures take affect:

- Does the change affect 25% of the bus hours?
- Does the change affect 25% of the one-way mileage?
- Does the change affect 25% of the service span?
- Does the change reduce the frequency by 50%?
- Does the change create a gap in service greater than one half mile?).

If a major service change is confirmed, MCTS must prepare a service and fare equity analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or disproportionate burden on the low-income population. If either impact exists, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable. Naturally, applying these thresholds to MCTS MOVE 2025 indicate it is a major service change. Consequently, MCTS performed a SAFE analysis.

DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the American Community Survey 2022 1-year estimates, the percentage of the Milwaukee County population that identifies as a minority race (non-white, non-Hispanic) is 51.5% while the percentage of Milwaukee County's population that is low-income (income in the past 12 months below the poverty level) is 17.1%. The majority of both populations reside on the northwest side and near south side of Milwaukee County.

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as "minority" and "non-minority" according to whether one-third of the route's mileage travels within minority census tracts. A census tract was identified as minority if the percent of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A review of the data indicates the changes in the MCTS MOVE 2025 plan would not have a disparate impact on minority populations not a disproportionate burden on low-income populations (Table 1). Service increases and reductions across the system balance out in a way which ends up causing trips for the minority and low-income tracts to increase. Trips in minority tracts will increase by .08%, and trips in low-income tracts will increase by 1.24%. See Map 2 below for further detail on service reductions and improvements.

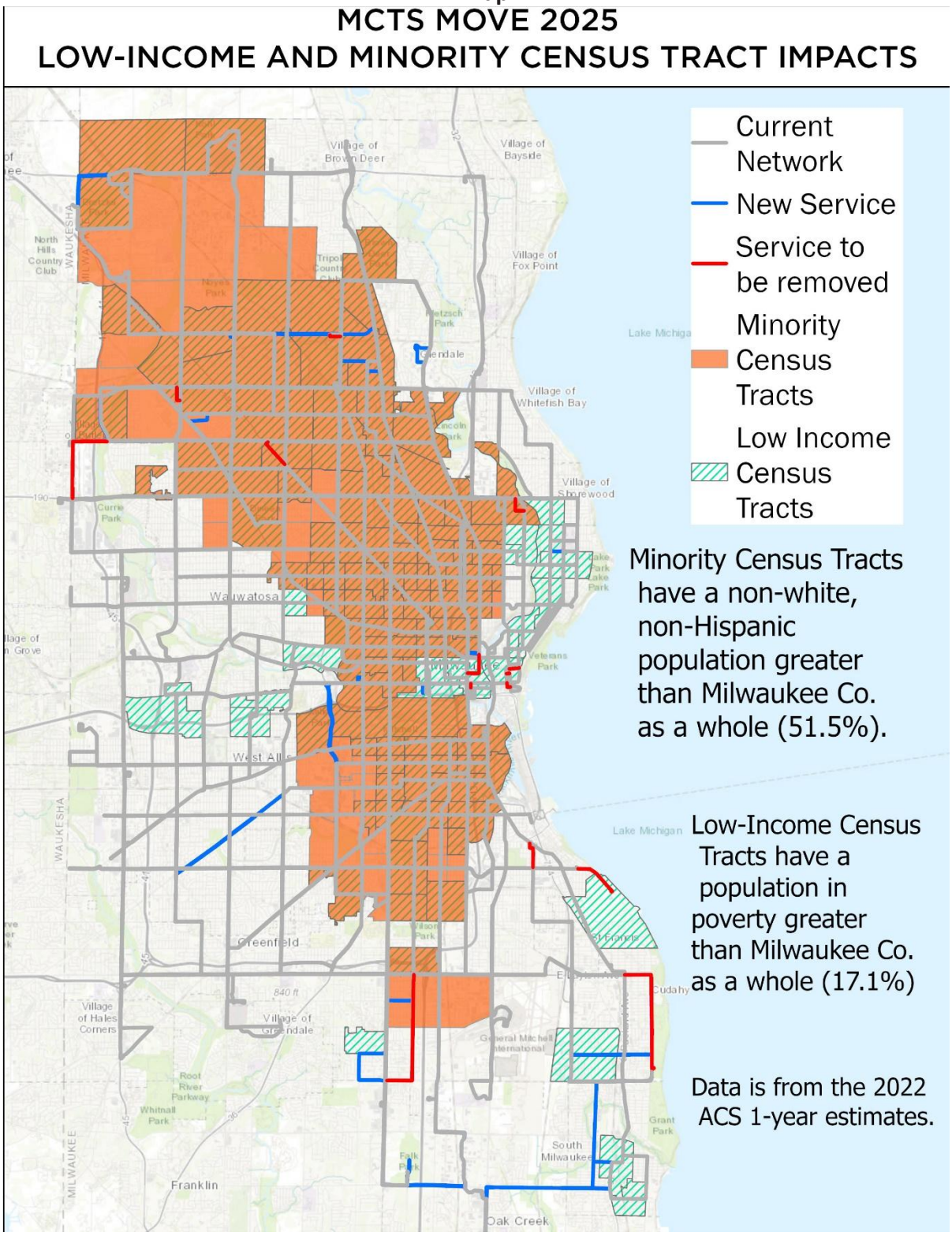
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Table 1

Population Group	Annual People Trips Before	Annual People Trips After	4/5ths Rule	Percent Change
Low Income	50,769,445	51,400,850	>100%	1.24%
Non-Low Income	48,558,740	48,346,780		-0.44%
Minority	56,308,255	56,352,040	>100%	0.08%
Non-Minority	43,439,375	43,395,590		-0.10%
Total	99,747,630	99,747,630		0

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Map 2



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SUMMARY

- MCTS MOVE is a system-wide redesign project that will impact almost half the routes in the network. Its basic purpose is to shift service to accommodate areas and routes demanding a higher level of service from those indicating they could do with less.
- Though certain routes in the system will see service reductions, service from other routes will be increased based on greater demand, and in some cases replace existing routing along the same corridors
- Per Title VI guidelines, MCTS must perform a service quality analysis to determine whether a major service change(s) would have a disparate impact on the minority population or a disproportionate burden on the low-income population.
- MCTS used a methodology that reviewed the change in potential people trips between the current system and the proposed MCTS MOVE system for the minority / non-minority population and the low income / non-low-income population.
- The analysis indicates the changes which are part of MCTS MOVE 2025 would not have a disparate impact on minority populations nor a disproportionate burden on low-income populations. Therefore, the MCTS MOVE Recommended Plan meets the requirements of Title VI.
- MOVE also ties into MCTS's goal of increasing the number of High Frequency routes (every 15 minutes or better).

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Milwaukee County Transit System
Interoffice Memorandum

TO: File

FROM: Tom Bertrand, Transit Planner

SUBJECT: SAFE Analysis – Early 2026 Service Changes

DATE: April 16th, 2026

MCTS's 2026 service changes meet the definition of a major service change and, per FTA rules, requires MCTS to prepare a Service and Fare Equity Analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or a disproportionate burden on the low-income population. If either impact does exist, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable.

BACKGROUND

In response to changing fiscal conditions, MCTS made service changes to multiple routes to address a $14 million budget gap that MCTS faces in 2026. The changes addressed the 2026 budget deficit through elimination of service during non-peak hours—times when ridership is historically lower. Six routes were reduced to peak-only service in January, and five routes were given routing and service reductions in March. These routes were identified based on low ridership, leading to minimal impact to riders while still allowing for cost savings. These adjustments allowed MCTS to operate more efficiently while still providing consistent service to vital areas.

The list of changes for 2026 are as follows:

Beginning in January:

On weekdays, the following routes began operating 6am-9am and 3pm-6pm:

20 (from 6:30am – 9pm previously)
28 (from 5am – 12:30am previously)
33 (from 5:30am – 12:15am previously)
34 (from 5am – 12:45am previously)
55 (from 6am – midnight previously)
58 (from 6am – 8pm previously)

On Saturdays, the schedule changed to reflect the following:

Route 20 began operating from 10am to 5pm (6:30am to 8:15pm previously)
Route 28 began operating from 10am to 5pm (6am to 11pm previously)
Route 33 began operating from 10am to 5pm (6am to 12:15am previously)
Route 34 began operating from 10am to 5pm (5am to 1am previously)
Route 55 began operating from 9am to 4pm (6:45am to 11:15pm previously)

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Route 58 began operating from 11am to 6pm (8:15am to 7:30pm previously)

On Sundays, the schedule changed to reflect the following:

Route 20 began operating from 10am to 5pm (7:30am to 8pm previously)
Route 28 began operating from 9am to 3pm (7:30am to 10:30pm previously)
Route 33 began operating from 11am to 5:30pm (6am to Midnight previously)
Route 34 began operating from 8am to 4pm (6am to 1am previously)
Route 55 began operating from 8am to 3pm (7:30am to Midnight previously)
Route 58 began operating from 9am to 3pm (8:30am to 8pm previously)

On weekdays, frequency adjustments were made to the following eight routes as follows:

- **Route 12**
  - Riders will have to wait 7 min. longer from 6 a.m. to 9 am and 4 min. longer from 3 p.m. to 6 p.m. (Buses will come every 19-22 min. versus 15 min.).
- **Route 14**
  - Riders will have to wait 9 min. longer from 5 a.m. to 7 p.m. (Buses will come every 35 min. versus 26 min.).
- **Route 31**
  - Riders will have to wait 15-17 min. longer all day (Buses will come every 42-50 min. versus 27-33 min.).
- **Route 51**
  - Riders will have to wait 7 min. longer from 6 a.m. to 9 am and from 3 p.m. to 6 p.m. (Buses will come every 22 min. versus 15 min.).
- **Route 53**
  - Riders will have to wait 8 min. longer from 6 a.m. - 7 p.m. (Buses will come every 28-30 min. versus 20-22 min.).
- **Route 57**
  - Riders will have to wait 6 min. longer from 6 a.m. to 9 am and from 3 p.m. to 6 p.m. (Buses will come every 28 min. versus 22 min.).
- **Route 60**
  - Riders will have to wait 2-3 min. longer from 6 a.m. to 6 p.m. (Buses will come every 23-24 min. versus 20-22 min.).
- **Route 63**
  - Riders will have to wait 5 min. longer from 6 a.m. to 9 am and from 3 p.m. to 6 p.m. (Buses will come every 20 min. versus 15 min.).

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Saturday and Sunday frequencies on the following nine routes were adjusted as follows:

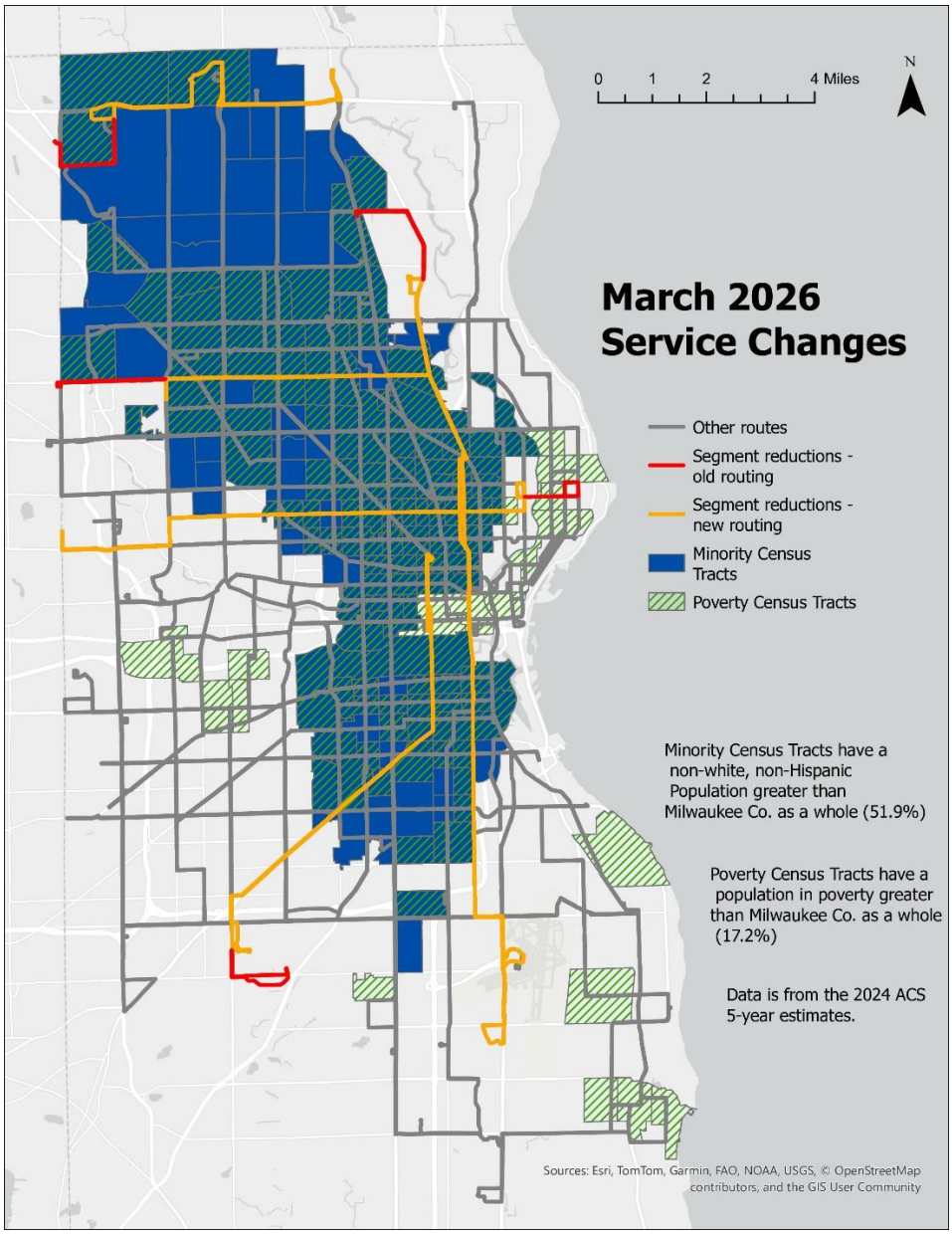
- **Route 18**
  - On Saturdays, riders will have to wait 2-3 min. longer from 8 a.m. - 7 p.m. (Buses will come every 22-24 min. versus 20-21 min.).
- **Route 19**
  - On Saturdays, riders will have to wait 3-4 min. longer from 7 a.m. - 6 p.m. (Buses will come every 24-25 min. versus 20-22 min.).
- **Route 21**
  - On Saturdays, riders will have to wait 8 min. longer from 7 a.m. - 10 a.m. (Buses will come every 30 min. versus 22 min.).
- **Route 31**
  - On Saturdays, riders will have to wait 15 min. longer from 7 a.m. - 9 p.m. (Buses will come every 40-45 min. versus 25-30 min.). On Sundays, riders will have to wait 15 min. longer from 11 a.m. - 8 p.m. (Buses will come every 45 min. versus 30 min.).
- **Route 59**
  - On Saturdays and Sundays, riders will have to wait 35 min. longer from 6 a.m. - 10 p.m. (1 Bus will come every 70 min. versus 35 min.).
- **Route 74**
  - On Saturdays, riders will have to wait 25 min. longer from 5 a.m. - 10 p.m. (1 Bus will come every 50-55 min. versus 25-30 min.). On Sundays, riders will have to wait 25-28 min. longer from 5 a.m. - 10 p.m. (1 Bus will come every 50-55 min. versus 25-27 min.).
- **GreenLine**
  - On Saturdays, riders will have to wait 5-7 min. longer from 7 a.m. - 9 p.m. (Buses will come every 23-26 min. versus 18-20 min.).
- **PurpleLine**
  - On Saturdays, riders will have to wait 3-5 min. longer from 6 a.m. - 8 p.m. (Buses will come every 23-26 min. versus 18-21 min.).
- **RedLine**
  - On Saturdays, riders will have to wait 3-4 min. longer from 11 a.m. - 6 p.m. (Buses will come every 19-20 min. versus 16-17 min.).

Beginning in March (see figure 1):

- **Route 11** – Buses began turning back at 92nd Street at the western end instead of ending at 124th Street.
- **Route 22** - Buses began turning back at Humboldt Avenue on the eastern end instead of at UWM.
- **Route 24** – All buses began ending at 74th & Holmes on the Southern end instead of continuing to Greendale.
- **Route 80** – Buses began ending at Glendale Industrial Park on the northern end instead of Good Hope Rd. & Teutonia Ave.
- **Route 88** – Buses began turning back at 107th St on the western end instead of 124th Street.

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- ***Figure 1 – March 2026 Service Changes***



TITLE VI GUIDELINES / THRESHOLD

MCTS Title VI guidelines require any service change be examined to determine if it meets the definitions of "major service change". A major service change is confirmed if any of five measures take effect:

- Does the change affect 25% of the bus hours?
- Does the change affect 25% of the one-way mileage?

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- Does the change affect 25% of the service span?
- Does the change reduce the frequency by 50%?
- Does the change create a gap in service greater than one half mile?).

If a major service change is confirmed, MCTS must prepare a service and fare equity analysis (SAFE). The SAFE indicates whether the change has a disparate impact on the minority population or disproportionate burden on the low-income population. If either impact exists, MCTS must take steps to avoid, minimize, or mitigate the impacts where practicable. Naturally, applying these thresholds to MCTS's 2026 service changes indicate that they constitute a major service change. Consequently, MCTS performed a SAFE analysis.

DETERMINATION OF DISPARATE IMPACT AND/OR DISPROPORTIONATE BURDEN

In general, the determination is based on an assessment of whether the impact of the service change on the minority or low-income population is more or less than the impact on the non-minority or non-low-income population.

According to the American Community Survey 2024 1-year estimates, the percentage of the Milwaukee County population that identifies as a minority race (non-white, non-Hispanic) is 51.9% while the percentage of Milwaukee County's population that is low-income (income in the past 12 months below the poverty level) is 17.2%. The majority of both populations reside on the northwest side and near south side of Milwaukee County.

As a part of its annual assessment of compliance required by FTA, MCTS categorizes routes as "minority" and "non-minority" according to whether one-third of the route's mileage travels within minority census tracts. A census tract was identified as minority if the percentage of minority residents exceeded the countywide average. The same methodology was followed for the low-income population.

A review of the data indicates MCTS's 2026 service changes would not have a disparate impact on minority populations nor a disproportionate burden on low-income populations (Table 1).

Table 1	Trips Before	Trips After	4/5ths Rule	
Low Income	61036995	53077285	90.15%	-13.04%
Non-Low Income	54604740	48184970		-11.76%
Minority	65936760	57066515	82.39%	-13.45%
Non-Minority	49704975	44195740		-11.08%
Total	115641735	101262255		-12.43%

Table 1

MEASURES TO AVOID, MITIGATE OR MINIMIZE IMPACTS

No mitigation is required. MCTS understands the impact of these service changes and was intentional in ensuring that route reductions and frequency changes be made across Milwaukee County, occurring such that a disproportionate impact was not felt in minority and/or low-income communities.

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SUMMARY

- MCTS's 2026 service changes reduce 6 routes to peak frequency-only on weekdays, with shorter service spans on weekends. 16 other routes saw frequency adjustments as well throughout the week. 5 routes saw routing changes in March.
- Per Title VI guidelines, MCTS must perform a service quality analysis to determine whether a major service change(s) would have a disparate impact on the minority population or a disproportionate burden on the low-income population.
- MCTS used a methodology that reviewed the change in potential people trips between the former system and the new system for the minority / non-minority population and the low income / non-low income population.
- The analysis indicates the changes which are part of MCTS's 2026 service changes would not have a disparate impact on minority populations nor a disproportionate burden on low-income populations. Therefore, these changes meet the requirements of Title VI.

Data Source: American Community Survey 2024 5-Year Estimates Data Profiles

Table: ACS Demographic and Housing Estimates (DP05)

Geography: Milwaukee County, Wisconsin

Label	Estimate	Margin of Error	Percent	Percent Margin of Error
SEX AND AGE				
Total population	926,331	*****	926,331	(X)
Male	450,049	±96	49%	±0.1
Female	476,282	±96	51%	±0.1
Sex ratio (males per 100 females)	94.5	±0.1	(X)	(X)
Under 5 years	59,461	±29	6%	±0.1
5 to 9 years	60,112	±1,449	7%	±0.2
10 to 14 years	62,860	±1,455	7%	±0.2
15 to 19 years	62,253	±79	7%	±0.1
20 to 24 years	62,040	±80	7%	±0.1
25 to 34 years	149,312	±33	16%	±0.1
35 to 44 years	124,358	±27	13%	±0.1
45 to 54 years	103,166	±30	11%	±0.1
55 to 59 years	53,997	±1,382	6%	±0.1
60 to 64 years	52,191	±1,382	6%	±0.1
65 to 74 years	83,758	±50	9%	±0.1
75 to 84 years	36,110	±851	4%	±0.1
85 years and over	16,713	±845	2%	±0.1
Median age (years)	35.5	±0.1	(X)	(X)
Under 18 years	219,441	*****	24%	*****
16 years and over	731,663	±661	79%	±0.1
18 years and over	706,890	*****	76%	*****
21 years and over	667,988	±949	72%	±0.1
62 years and over	167,554	±1,315	18%	±0.1
65 years and over	136,581	±27	15%	±0.1
18 years and over	706,890	*****	706,890	(X)
Male	338,053	±25	48%	±0.1
Female	368,837	±26	52%	±0.1
Sex ratio (males per 100 females)	91.7	±0.1	(X)	(X)
65 years and over	136,581	±27	136,581	(X)
Male	59,899	±19	44%	±0.1
Female	76,682	±18	56%	±0.1

Label	Estimate	Margin of Error	Percent	Percent Margin of Error
Sex ratio (males per 100 females)	78.1	±0.1	(X)	(X)
RACE				
Total population	926,331	*****	926,331	(X)
One race	808,506	±3,625	87%	±0.4
Two or More Races	117,825	±3,625	13%	±0.4
One race	808,506	±3,625	87%	±0.4
White	467,429	±2,135	51%	±0.2
Egyptian	732	±454	0%	±0.1
English	16,474	±1,281	2%	±0.1
German	81,256	±2,622	9%	±0.3
Irish	17,767	±1,057	2%	±0.1
Italian	10,295	±996	1%	±0.1
Lebanese	197	±105	0%	±0.1
Other White	340,708	±3,687	37%	±0.4
Black or African American	239,717	±1,985	26%	±0.2
African American	104,103	±3,868	11%	±0.4
Ethiopian	367	±213	0%	±0.1
Haitian	243	±151	0%	±0.1
Jamaican	997	±396	0%	±0.1
Nigerian	1,211	±654	0%	±0.1
Somali	1,880	±1,053	0%	±0.1
Other Black or African American	130,916	±3,865	14%	±0.4
American Indian and Alaska Native	6,170	±790	1%	±0.1
Aztec	1,391	±642	0%	±0.1
Blackfeet Tribe of the Blackfeet Indian Reservation of Montana	18	±23	0%	±0.1
Maya	169	±91	0%	±0.1
Native Village of Barrow Inupiat Traditional Government	0	±23	0%	±0.1
Navajo Nation	61	±56	0%	±0.1
Nome Eskimo Community	0	±23	0%	±0.1

Label	Estimate	Margin of Error	Percent	Percent Margin of Error
Other American Indian and Alaska Native	4,531	±542	1%	±0.1
Asian	45,162	±934	5%	±0.1
Asian Indian	7,491	±1,097	1%	±0.1
Chinese	4,271	±694	1%	±0.1
Filipino	2,653	±521	0%	±0.1
Japanese	482	±261	0%	±0.1
Korean	1,528	±372	0%	±0.1
Vietnamese	1,763	±545	0%	±0.1
Other Asian	26,974	±1,439	3%	±0.2
Native Hawaiian and Other Pacific Islander	164	±83	0%	±0.1
Chamorro	10	±12	0%	±0.1
Native Hawaiian	36	±31	0%	±0.1
Samoan	2	±4	0%	±0.1
Other Native Hawaiian and Other Pacific Islander	116	±92	0%	±0.1
Some Other Race	49,864	±2,711	5%	±0.3
Two or More Races	117,825	±3,625	13%	±0.4
White and Black or African American	16,700	±1,659	2%	±0.2
White and American Indian and Alaska Native	5,928	±640	1%	±0.1
White and Asian	7,281	±924	1%	±0.1
White and Some Other Race	74,481	±2,998	8%	±0.3
Black or African American and American Indian and Alaska Native	1,307	±449	0%	±0.1
Black or African American and Some Other Race	3,085	±733	0%	±0.1
Race alone or in combination with one or more other races				
Total population	926,331	*****	926,331	(X)
White	577,944	±3,337	62%	±0.4
Black or African American	266,218	±1,292	29%	±0.1

Label	Estimate	Margin of Error	Percent	Percent Margin of Error
American Indian and Alaska Native	17,483	±1,312	2%	±0.1
Asian	55,585	±700	6%	±0.1
Native Hawaiian and Other Pacific Islander	1,576	±427	0%	±0.1
Some Other Race	132,558	±2,741	14%	±0.3
HISPANIC OR LATINO AND RACE				
Total population	926,331	*****	926,331	(X)
Hispanic or Latino (of any race)	157,150	*****	17%	*****
Mexican	102,180	±2,797	11%	±0.3
Puerto Rican	36,677	±2,519	4%	±0.3
Cuban	1,195	±316	0%	±0.1
Other Hispanic or Latino	17,098	±1,396	2%	±0.2
Not Hispanic or Latino	769,181	*****	83%	*****
White alone	445,132	±828	48%	±0.1
Black or African American alone	235,244	±1,948	25%	±0.2
American Indian and Alaska Native alone	2,910	±320	0%	±0.1
Asian alone	44,897	±917	5%	±0.1
Native Hawaiian and Other Pacific Islander alone	125	±72	0%	±0.1
Some Other Race alone	3,035	±697	0%	±0.1
Two or More Races	37,838	±2,152	4%	±0.2
Two races including Some Other Race	5,158	±834	1%	±0.1
Two races excluding Some Other Race, and three or more races	32,680	±2,030	4%	±0.2
Total housing units	426,715	±391	(X)	(X)

Data Source: American Community Survey 2024 5-Year Estimates Data Profiles

Table: Poverty Status in the Past 12 Months (S1701)

Geography: Milwaukee County, Wisconsin

	Total		Below poverty level		Percent below poverty level	
Label	**Estimate**	**Margin of Error**	**Estimate**	**Margin of Error**	**Estimate**	**Margin of Error**
Population for whom poverty status is determined	908,298	±620	156,419	±4,695	17%	±0.5
AGE						
Under 18 years	216,519	±547	51,245	±2,855	24%	±1.3
Under 5 years	58,564	±279	14,117	±1,312	24%	±2.2
5 to 17 years	157,955	±449	37,128	±2,101	24%	±1.3
Related children of householder under 18 years	215,981	±608	50,773	±2,872	24%	±1.3
18 to 64 years	558,528	±321	85,813	±2,468	15%	±0.4
18 to 34 years	226,349	±252	40,628	±1,395	18%	±0.6
35 to 64 years	332,179	±232	45,185	±1,863	14%	±0.6
60 years and over	185,164	±1,376	28,613	±1,437	16%	±0.7
65 years and over	133,251	±171	19,361	±1,098	15%	±0.8
SEX						
Male	440,803	±610	72,447	±3,024	16%	±0.7
Female	467,495	±513	83,972	±2,657	18%	±0.6
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	456,239	±2,179	46,015	±2,184	10%	±0.5
Black or African American alone	235,734	±2,027	68,545	±3,645	29%	±1.5
American Indian and Alaska Native alone	6,097	±788	1,289	±364	21%	±5.3
Asian alone	44,413	±955	7,998	±1,663	18%	±3.6
Native Hawaiian and Other Pacific Islander alone	164	±83	31	±30	19%	±21.2
Some other race alone	48,984	±2,698	9,704	±1,433	20%	±2.5
Two or more races	116,667	±3,647	22,837	±1,833	20%	±1.5
Hispanic or Latino origin (of any race)	155,124	±319	31,024	±1,918	20%	±1.2

	Total		Below poverty level		Percent below poverty level	
Label	**Estimate**	**Margin of Error**	**Estimate**	**Margin of Error**	**Estimate**	**Margin of Error**
White alone, not Hispanic or Latino	434,429	±970	42,462	±2,183	10%	±0.5
EDUCATIONAL ATTAINMENT						
Population 25 years and over	613,654	±178	85,680	±2,761	14%	±0.4
Less than high school graduate	63,832	±1,658	17,867	±1,169	28%	±1.7
High school graduate (includes equivalency)	167,381	±3,246	33,710	±1,880	20%	±0.9
Some college, associate's degree	168,487	±2,668	22,543	±1,310	13%	±0.8
Bachelor's degree or higher	213,954	±2,774	11,560	±931	5%	±0.4
EMPLOYMENT STATUS						
Civilian labor force 16 years and over	472,330	±2,798	40,977	±1,595	9%	±0.3
Employed	449,704	±3,137	33,150	±1,415	7%	±0.3
Male	225,366	±2,047	14,752	±997	7%	±0.5
Female	224,338	±2,442	18,398	±1,116	8%	±0.5
Unemployed	22,626	±1,479	7,827	±870	35%	±3.1
Male	11,918	±1,064	3,641	±553	31%	±3.8
Female	10,708	±975	4,186	±513	39%	±3.8
WORK EXPERIENCE						
Population 16 years and over	716,409	±680	110,055	±2,998	15%	±0.4
Worked full-time, year-round in the past 12 months	326,255	±3,162	9,927	±864	3%	±0.3
Worked part-time or part-year in the past 12 months	166,053	±2,814	33,294	±1,385	20%	±0.7
Did not work	224,101	±3,042	66,834	±2,676	30%	±1.0

Data Sources: American Community Survey 2024 5-Year Estimates Data Profiles

Table: ACS Demographic and Housing Estimates (DP05) and Poverty Status in the Past 12 Months (S1701)

Geography: All Census Tracts in Milwaukee County, Wisconsin

Census Tract	% Minority	% Low-Income
1.01	83%	53%
1.02	79%	16%
2.01	84%	37%
2.02	72%	9%
3.01	26%	6%
3.02	94%	44%
3.03	68%	14%
3.04	80%	10%
4	78%	21%
5.01	76%	12%
5.02	91%	28%
6	70%	9%
7	84%	13%
8	83%	15%
9	92%	31%
10	87%	22%
11	89%	24%
12	94%	52%
13	94%	18%
14	89%	22%
15	89%	19%
16	96%	20%
17	87%	20%
18	88%	24%
19	95%	32%
20	91%	39%
21	97%	36%
22	80%	16%
23	97%	22%
24	98%	16%
25	95%	28%
26	94%	43%
27	91%	29%
28	89%	28%

Census Tract	% Minority	% Low-Income
29	91%	20%
30	88%	18%
31	86%	38%
32	89%	8%
33	86%	19%
34	76%	21%
35	96%	25%
36	93%	13%
37	82%	6%
38	91%	12%
39	95%	30%
40	97%	25%
41	97%	27%
42	93%	27%
43	92%	27%
44	84%	23%
45	99%	41%
46	96%	34%
47	98%	36%
48	96%	49%
49	90%	25%
50	73%	13%
51	91%	24%
52	51%	9%
53	56%	12%
54	53%	13%
55	43%	7%
56	20%	7%
57	52%	15%
58	46%	5%
59	80%	30%
60	92%	34%
61	84%	13%
62	97%	41%
63	100%	31%
64	100%	43%
65	98%	40%
66	93%	38%
67	94%	21%
68	94%	44%

Census Tract	% Minority	% Low-Income
69	97%	27%
70	92%	46%
71	24%	10%
72	28%	9%
73	30%	25%
74	27%	21%
75	21%	15%
76	12%	19%
77	21%	21%
78	16%	41%
79	31%	14%
80	36%	23%
81	90%	32%
84	99%	39%
85	96%	38%
86	97%	27%
87	100%	61%
88	92%	44%
89	97%	56%
90	98%	28%
91	83%	37%
92	58%	18%
93	56%	16%
94	31%	5%
95	24%	12%
96	98%	12%
97	93%	19%
98	100%	54%
99	97%	37%
106	55%	16%
107	30%	11%
108	33%	14%
110	35%	25%
111	28%	12%
112	25%	20%
113	33%	17%
114	27%	16%
122	87%	23%
123	92%	39%
124	40%	13%

Census Tract	% Minority	% Low-Income
125	27%	6%
126	20%	9%
127	23%	3%
128	25%	18%
129	29%	23%
130	53%	17%
133	63%	22%
134	93%	18%
135	81%	42%
136	82%	41%
137	95%	34%
141	86%	53%
143	26%	18%
144	33%	21%
146	43%	80%
147	39%	75%
148	75%	56%
149	66%	45%
157	96%	43%
158	91%	30%
159	87%	15%
160	89%	25%
161	79%	18%
162	78%	22%
163	95%	32%
164	96%	43%
165	88%	26%
166	77%	46%
167	92%	31%
168	90%	20%
169	80%	47%
170	84%	29%
171	87%	11%
172	83%	23%
173	90%	12%
174	94%	30%
175	91%	43%
176	88%	35%
179	22%	5%
180	20%	7%

Census Tract	% Minority	% Low-Income
181	20%	4%
182	17%	4%
183	16%	7%
184	27%	4%
185	33%	11%
186	82%	40%
187	92%	11%
188	81%	35%
189	76%	22%
190	65%	25%
191	63%	12%
192	44%	15%
193	46%	7%
194	35%	10%
195	28%	8%
196	47%	15%
197	42%	12%
198	49%	13%
199	41%	9%
200	68%	13%
201	80%	16%
202	61%	25%
203	73%	22%
204	87%	12%
205	80%	21%
206	24%	7%
207	23%	6%
208	25%	4%
209	19%	6%
210	38%	10%
211	33%	14%
212	38%	13%
213	37%	9%
214	67%	40%
215	58%	7%
216	53%	6%
217	31%	9%
218	34%	19%
301	18%	5%
351	12%	1%

Census Tract	% Minority	% Low-Income
352	22%	3%
401	22%	5%
501.01	50%	3%
501.03	49%	11%
501.04	52%	10%
601.01	34%	9%
601.02	27%	3%
602	40%	15%
701	14%	2%
702	10%	4%
703	26%	4%
801	31%	15%
802	25%	8%
803	15%	5%
804	20%	32%
901	41%	8%
902	19%	6%
903	39%	4%
906	18%	6%
907	8%	3%
908	9%	1%
909	21%	5%
910	21%	4%
911	13%	0%
912	27%	10%
913	13%	5%
914	22%	8%
1001	49%	12%
1002	44%	16%
1003	20%	18%
1004	22%	22%
1005	26%	8%
1006	29%	9%
1007	22%	10%
1008	9%	13%
1009	30%	15%
1010	32%	7%
1011	18%	12%
1012	22%	12%
1013	16%	6%

Census Tract	% Minority	% Low-Income
1014	29%	11%
1015	36%	6%
1016	38%	12%
1017	43%	10%
1018	27%	10%
1101	55%	20%
1201.01	16%	11%
1201.02	15%	5%
1202.01	27%	13%
1202.02	45%	12%
1202.03	49%	9%
1203	35%	11%
1204	44%	8%
1205.01	30%	3%
1205.02	30%	7%
1301	19%	4%
1302	12%	3%
1401	17%	4%
1402.01	16%	14%
1402.02	26%	5%
1501	16%	9%
1503.01	18%	3%
1503.03	16%	3%
1503.04	22%	7%
1601.01	27%	4%
1601.02	36%	7%
1602.02	24%	6%
1602.03	31%	3%
1602.05	38%	12%
1602.06	40%	7%
1603.01	15%	4%
1603.02	23%	3%
1701	13%	13%
1702	24%	8%
1703	32%	18%
1704	17%	3%
1705	18%	13%
1706	24%	19%
1707	29%	19%
1801	21%	1%

Census Tract	% Minority	% Low-Income
1802	20%	14%
1803	35%	6%
1804	16%	10%
1805	18%	21%
1851	29%	26%
1852	15%	7%
1853	29%	10%
1854	99%	36%
1855	100%	18%
1856	77%	26%
1857	96%	46%
1858	100%	23%
1859	98%	43%
1860	91%	50%
1861	89%	55%
1862	94%	55%
1863	46%	17%
1864	29%	72%
1865	60%	31%
1866	68%	15%
1868	73%	30%
1869	20%	7%
1870	26%	11%
1872	20%	9%
1873	21%	9%
1874	18%	5%