2022 RTD Language Access Plan

Submitted in fulfillment of Title VI of the
Civil Rights Act of 1964 and FTA Circular 4702.1B

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Acronyms

ACS	American Community Survey
CDE	Colorado Department of Education
DOT	Department of Transportation
LAP	Language Access Plan
LEP	Limited English Proficiency or Limited English Proficient
PUMS	Public Use Microdata Sample
RTD	Regional Transportation District
USDOT	United States Department of Transportation

2022 Language Access Plan

Definitions

Limited English Proficiency or Limited English Proficient (LEP): People with limited English proficiency (LEP) are persons whose primary language is not English and who have a limited ability to read, write, speak or understand English.

Meaningful access: Language assistance that results in accurate, timely and effective communication at no cost to the LEP person. For LEP persons, meaningful access denotes access that is not unreasonably restricted, delayed or inferior as compared to access to programs or activities provided to English proficient persons.

Vital Document: Paper or electronic material that is critical for accessing RTD's services, programs and activities or contains information about procedures and processes required by law. Classification of a document as "vital" depends upon the importance of the program, information, encounter or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

Effective communication: Sufficient communication to provide the LEP person with meaningful access to the services that otherwise are available to the public.

Reasonable steps: Steps taken, or language assistance services provided, to ensure effective communication with people limited in English (e.g., interpretation services).

Recipient: Any state, political subdivision of any state, or instrumentality of any state; public or private agency, institution, organization, or other entity; or any individual, in any state, to whom federal financial assistance is extended, directly or through another recipient.

Safe harbor: The Safe Harbor Provision outlines the circumstances that can provide agencies a safe harbor regarding the translation of written materials for LEP populations. It stipulates that a grantee is compliant if each eligible LEP language group has written translation of vital documents in accordance with the Four Factor Analysis. The LEP Safe Harbor Threshold for language assistance at is 5% of or 1,000 persons in (whichever is less) the population to be served.

Language Access Plan Purpose

The purpose of the Regional Transportation District's (RTD) Language Access Plan (LAP) is to document and guide the actions that RTD has taken – and will take – to ensure meaningful access to RTD transit programs, services and activities by people with limited English proficiency (LEP) in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166.

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Executive Summary

In accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, the Regional Transportation District (RTD) is committed to ensuring its diverse community of residents, customers and visitors can effectively participate in or benefit from its transit services and programs regardless of race, color or national origin. Importantly, this means that RTD is also responsible for taking reasonable steps to provide customers of limited English proficiency (LEP) with *meaningful* access to our services, facilities and programs.[1] In some circumstances, failure to ensure that people with LEP can meaningfully access federally assisted programs or activities may constitute national origin discrimination under Title VI of the Civil Rights Act of 1964. RTD, as a recipient of federal financial assistance, has an obligation to reduce language barriers that inhibit meaningful access by LEP persons to the agency's services. Consequently, RTD is committed to providing language assistance not only to comply with the requirements of Title VI, Executive Order 13166 and United States Department of Transportation (USDOT) LEP Implementing Guidance but also to uphold its own principles of equitably providing safe, reliable transportation to the community.

This document includes a Four Factor Analysis, as established by USDOT LEP Implementing Guidance, that assesses the language assistance needs of LEP persons in RTD's service area. The analysis found that, according to the U.S. Census Bureau, approximately 227,262 of the 3.2 million people in the RTD service area (close to 7% of the RTD service area population) speak English "less than very well." Further, approximately 378,376 persons, or 11.6% percent of the RTD service area population, are foreign born; and 646,021 persons, over 19% of the RTD service area population, speak a language other than English at home. Sixty-eight percent of people with limited English proficiency are Spanish speakers, followed by Vietnamese (4.4%) and Chinese (4.2%). Supplemented with data from the Public Use Microdata Sample (PUMS) as well as other sources including (but not limited to) Colorado state agencies, the analysis reveals 21 languages that qualify as safe harbor languages. The focus of RTD's language assistance measures will thus be on these languages.

Following the Four Factor Analysis, this document establishes RTD's updated Language Access Plan (LAP) to guide language assistance measures from 2022 to 2025. After an extensive review of the 2019 LAP, RTD's LEP inter-division comprised of Administration, Communications, Operations, Planning and Security recommended a two-tiered approach to retain and expand upon past language assistance measures to better meet the needs of people with limited English proficiency. The tiers are as follows:

- **Tier One: Successful Activities to Continue.** Tier One will retain existing programs and activities designed to meet the language needs of regional LEP populations, such as:

    - Telephone interpreters in virtually any language;
    - Multilingual printed materials and multilingual information on RTD's website; and
    - Continuing development of partnerships with community organizations that serve LEP

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[1] Those with LEP are defined by the United States Government as persons whose primary language is not English and who have a limited ability to read, write, speak or understand English.

populations.

- **Tier Two: Activities to Deepen our Focus.** Tier Two identifies new areas to further the agency's goal of providing LEP customers with meaningful access to RTD programs and services. These activities focus on four primary areas:

  1. *Updating and monitoring the LAP: how RTD monitors, evaluates and updates the LAP.* This area of focus provides guidance for monitoring and compliance of the LAP, program research, program administration and primary as well as secondary research to obtain feedback from LEP populations.

  2. *Language assistance: how RTD provides language assistance services by language.* This area of focus relates to providing free language assistance for outreach documents and in-person services. It also guides the evaluation of which documents are vital for translation and the format(s) that most effectively communicate the messages contained in those documents. Lastly, this area guides how RTD will provide information through customer information channels as well as conduct culturally responsive outreach.

  3. *Providing notice of language assistance: how RTD administers notice to LEP persons about the availability of language assistance.* This area of focus provides guidance for providing notice of language assistance on outreach documents, on the system and providing notice of the Title VI complaint process.

  4. *Training programs for personnel: how RTD trains employees to provide timely and reasonable language assistance to LEP populations.* This area of focus provides guidance for the development of curriculum and the incorporation of LAP information into the employee environment in order to prepare all front line and other relevant staff to effectively engage and respond to LEP customers.

In pursuing this two-tiered approach to language access, RTD seeks to better mitigate language barriers that could prevent LEP customers from accessing the agency's transit programs and services. It is RTD's intent that this approach will allow the agency to more equitably serve the Denver metropolitan region's diverse communities, in turn enabling more customers the freedom to get where they want to go.

Introduction

As the Denver metropolitan region's public transportation provider, the Regional Transportation District (RTD) is committed to its residents, customers and visitors regardless of race, color or national origin. Importantly, this means RTD is responsible for making reasonable accommodations and removing barriers to accessing those services for individuals in protected classes – which include people with limited English proficiency (LEP). For LEP persons, language can act as a barrier to accessing the benefits of RTD's services, complying with responsibilities such as payment or safety measures, or understanding other information regarding RTD's activities. A commitment to providing language assistance for those with LEP is thus not only required of RTD in

order to comply with federal regulations, but it is also intrinsic to the transit agency's mission, vision and values to provide accessible public transportation to all.

Legal Basis for Language Assistance Requirements

The Civil Rights Act of 1964, Federal Executive Order 13166 and the Department of Transportation's (USDOT) LEP Guidance together require that agencies which receive federal funding, including RTD, must make reasonable accommodations for LEP persons. At the core of these requirements is Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., which provides that "no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." While Title VI itself does not explicitly include language as a protected class, the 1974 Supreme Court case *Lau v. Nichols*, 414 U.S. 563 interpreted Title VI regulations to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons, as such conduct would constitute national origin discrimination.

Later, on August 11, 2000, former President Bill Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," which requires recipients of federal financial assistance to take reasonable steps to ensure meaningful access to the benefits, services, information and other important portions of their programs and activities for LEP persons. On December 14, 2005, the U.S. Department of Transportation published guidance for its recipients to ensure compliance with statutory and regulatory requirements.

To further assist transit agencies, the Federal Transit Administration (FTA) published the most current Circular 4702.1B, "Title VI Requirements and Guidelines for FTA Recipients" on October 1, 2012. Chapter III Part 9 of this Circular directs FTA recipients (including RTD) and sub-recipients to:

1. Conduct a Four Factor Analysis;

2. Develop a Language Access Plan (LAP); and

3. Provide appropriate language assistance.

In fulfilling these criteria, transit agencies such as RTD must ensure they are striving to mitigate language barriers to their programs and services. This report documents RTD's Four Factor Analysis and LAP describing how RTD will continue to provide meaningful access to its transit services to people with LEP.

RTD's Commitment to Equity: Progress Made in Language Access

RTD's mission is to make lives better through connections, and its vision is to be "the trusted leader in mobility, delivering excellence and value to customers and community." RTD recognizes the role that public transit plays in achieving mobility for all people, in turn improving their connections to employment opportunities, recreational activities, health care, housing, social programs and services, and more. For example, as part of its Reimagine RTD project launched in 2019, RTD's values are increasingly embracing concepts of transit equity, with an eye towards providing meaningful access to high-quality public transportation services for a broad and progressively

more diverse community. Improving the accessibility of RTD's activities, programs and services via language access is one key way to reduce mobility barriers for people with limited English proficiency, in turn making local public transit more equitable for all.

Figure 1. RTD's Six Guiding Principles Adopted by the Board in April 2021

Mobility	**Equity**	**Financial**	**Partnerships**	**Workforce**	**Sustainability**
Provide safe, reliable transportation service to improve the quality of life of residents, customers, and visitors.	Remove barriers to accessing transportation services that enable customers to have the freedom to get where they want to go.	Leverage resources and maximize cost efficiencies, serving as a good steward of taxpayer dollars.	Pursue partnerships with both public and private organizations that can help identify innovative opportunities to enhance mobility throughout the region.	Foster a dynamic, diverse workforce that promotes engagement and innovation, recognizing team members as RTD's greatest asset.	Provide sustainable mobility options while continually seeking to reduce RTD's environmental impact.

As concrete evidence to RTD's commitment to equity and language access, the agency launched its Systemwide Fare Study and Equity Analysis in spring 2022. The study aims to examine RTD's fares and explore changes to its fare structure to make its services more equitable, simple and affordable. The agency is conducting the study in response to customer feedback that RTD's fares are expensive and complex – complexity that is made worse when customers may not speak English proficiently. Working towards the desired goals of improved equity and simplicity will include making RTD's services more accessible to LEP persons; further, the study itself was designed to be as supportive of language access as possible. For instance, RTD did the following:

- Created the study survey in English, Spanish, Vietnamese and Chinese (the top four languages in RTD's service area);

- Provided instructions for all safe harbor language customers to translate the English webpage into their preferred languages;

- Provided language assistance to participate in the study at no cost;

- Conducted a customer and community meeting in Spanish; and

- Worked with 6 multicultural community-based organizations to host focus groups with their constituents.

Figure 2. Social Media Graphics in Spanish and English: RTD's Systemwide Fare Study and Equity Analysis

Historically, RTD has made strides to ensure meaningful access to public transportation for LEP persons. However, as the Systemwide Fare Study and Equity Analysis illustrates, the agency can do more to attract customers who would otherwise be excluded from utilizing services because of language barriers and, ideally, encourage customers to continue using the system after they are proficient in English or may have more transportation options.

LAP Monitoring and Updating

USDOT guidance states that recipients should (where appropriate) have a process for determining whether new documents, programs, services and activities need to be made accessible for LEP persons; RTD does so as part of its three-year cycle to monitor Title VI compliance and an ongoing basis as changing service area demographics and service changes warrant. As such, RTD continually monitors demographic information and engages with community organizations serving LEP persons to remain in tune with those in need of language assistance.

With a burgeoning focus on equity, RTD sees much room to build upon its existing programs and activities designed to serve LEP persons and is seeking to expand its historic approach to language access. Firstly, in 2021, RTD established a dedicated outreach program intended to further the implementation of language access measures. This outreach program is housed in the Civil Rights Division and has a dedicated staff member, the Transit Equity Specialist (LAP Coordinator), who is assigned to help develop the program, carry out the day-to-day tasks, coordinate across departments for agency-wide implementation and conduct outreach to LEP persons

and community-based organizations serving these populations. The program is overseen by the Transit Equity Manager. Further, the Transit Equity Office in RTD's Civil Rights Division assumed the responsibility to update RTD's LAP. Part of the update process included reconvening an inter-departmental workgroup to address federal language access requirements for LEP populations, restore agency commitment to its language access program and clarify staff roles and responsibilities. In March 2020, the Transit Equity Office selected staff members throughout the agency in accordance with their position and asked them to participate in the update process. Specifically, the workgroup aimed to:

1. **Complete a needs assessment of LEP persons in the district**. The Four Factor Analysis assessment (see below) permitted Market Research and Transit Equity staff to identify high concentrations and frequency of contact of LEP populations, to ascertain the nature as well as the importance of RTD services and programs and to determine if there were language barriers limiting the access of LEP persons to RTD services.

2. **Develop the LAP, including its Guidelines Index and 2022-2025 Implementation Schedule.** This undertaking provides a framework for the provision of timely and reasonable language assistance to those with limited English proficiency who access RTD's services as well as a method to evaluate and review the effectiveness of a LAP.

Staff members from the Transit Equity Office developed a work plan with designated tasks and timelines to help the inter-departmental workgroup complete the LAP update in a timely manner. This process allowed for a methodical, focused approach to the assessment; it also defined deliverables, assigned tasks and clarified roles and responsibilities. The following Four Factor Analysis and updated LAP are products from that work.

Overview of the Four Factor Analysis

Per the USDOT LEP Guidance, transit providers must determine the language assistance needs of the LEP persons they are likely to serve by utilizing a Four Factor Analysis. The assessment involves the following factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by an RTD program, activity or service;

2. The frequency with which LEP persons interact with RTD programs, activities or services;

3. The nature and importance of programs, activities or services provided by RTD to the LEP population; and

4. The resources available to RTD and overall cost to provide language assistance.

RTD has conducted the Four Factor Analysis using a combination of market research resources which consists of an evaluation of data from the U.S. Census Bureau, engagement with RTD staff, consultation with Colorado state agencies, consultation with community organizations and direct interactions with people limited in English proficiency. The results of this analysis will be used as the criteria for the development of language assistance

measures employed by RTD.

Factor 1: Identification of LEP Persons in RTD Service Area who Need Language Assistance

The first step in conducting the Four Factor Analysis is to assess the number or proportion of people with LEP who are eligible to be served or encountered by RTD. The U.S. Census Bureau's American Community Survey (ACS) gives RTD a reliable baseline of the safe harbor languages[2] within the RTD boundaries.[3] According to the ACS, of the 3.2 million people in the RTD service area, approximately 227,262, close to 7% of the RTD service area population, speaks English "less than very well."[4] The following points identify other notable findings from the assessment of the number and proportion of LEP persons in the RTD service area:

- Approximately 378,376 persons, 11.6% percent of the RTD service area population, are foreign born.[5]

- Approximately 646,021 persons, over 19% of the RTD service area population, speak a language other than English at home.

- North and Northeast Denver, East Lakewood and Northwest, North, and Northeast Aurora have the highest concentrations of people with LEP, containing multiple census tracts with more than 2,000 LEP persons.

American Community Survey (ACS)

The figures below display those LEP populations, by language, that meet the LEP safe harbor language threshold (5% of the service area population or 1,000 people that are likely to be served by RTD, whichever is less). Spanish is by far the most frequently spoken language at home other than English, accounting for more than 68% of the LEP population. Excluding the grouped categories of "Other Asian/Pacific Island Languages" and "Other Indo-European Languages," the second- and third-most languages spoken at home are Vietnamese and Chinese (comprising 4.4% and 4.2% of the LEP population, respectively).

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[2] The Safe Harbor Provision outlines the circumstances that can provide agencies a safe harbor regarding the translation of written materials for LEP populations. It stipulates that a grantee is compliant if each eligible LEP language group has written translation of vital documents in accordance with the Four Factor Analysis. The LEP Safe Harbor Threshold for language assistance at is 5% of or 1,000 persons in (whichever is less) the population to be served.

[3] RTD estimated district boundaries using the American Community Survey (ACS) 5-Year Estimates at the Census Tract level. RTD analyzed all Census Tracts required to include all 8 counties RTD has services in: Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson, and Weld Counties.

[4] American Community Survey B16001 – Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

[5] American Community Survey DP02 2020 Selected Social Characteristics in the United States: Foreign Born

Figure 3. Languages Spoken at Home by LEP Persons Age 5 and Older in RTD District from ACS

Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	155,241	4.8%	68.4%
Other Asian/Pacific Island Languages	11,187	0.3%	4.9%
Other Indo-European Languages (incl. Albanian, Lithuanian, Pashto, Romanian, Swedish)	10,191	0.3%	4.5%
Vietnamese	10,061	0.3%	4.4%
Chinese (incl. Mandarin, Cantonese)	9,612	0.3%	4.2%
Russian, Polish or Other Slavic Languages	7,005	0.2%	3.1%
Korean	4,917	0.2%	2.2%
Arabic	3,094	0.1%	1.4%
French, Haitian or Cajun	3,063	0.1%	1.3%
Tagalog (incl. Filipino)	1,466	0.0%	0.6%
German or Other West Germanic Languages	1,401	0.0%	0.6%

Source: U.S. Census American Community Survey Tables: 2015-2019 (5-Year Estimates)

Figure 4. Languages with LEP Populations ≥ 1,000
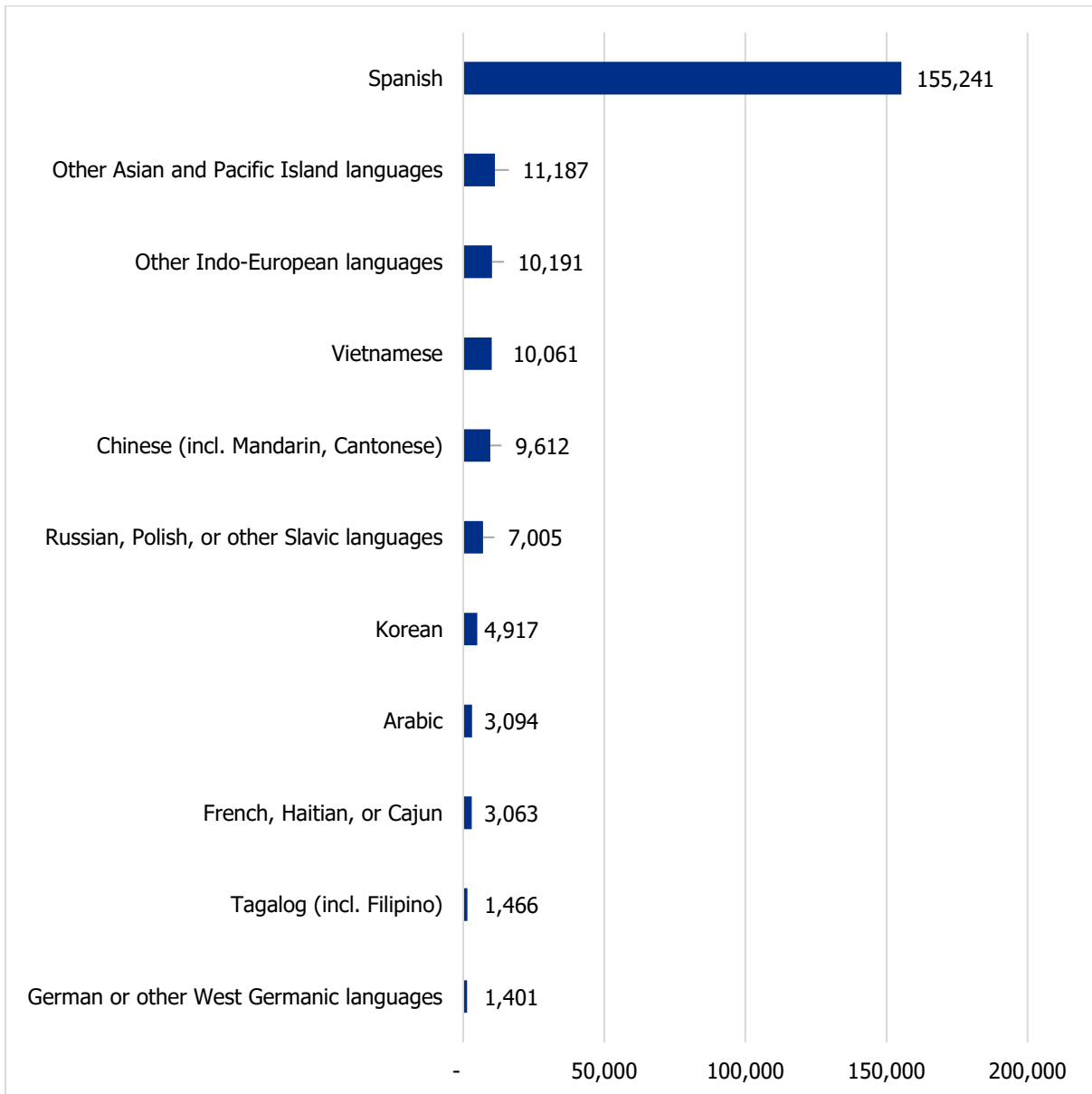
Language	Population
Spanish	155,241
Other Asian and Pacific Island languages	11,187
Other Indo-European languages	10,191
Vietnamese	10,061
Chinese (incl. Mandarin, Cantonese)	9,612
Russian, Polish, or other Slavic languages	7,005
Korean	4,917
Arabic	3,094
French, Haitian, or Cajun	3,063
Tagalog (incl. Filipino)	1,466
German or other West Germanic languages	1,401

Source: U.S. Census American Community Survey Tables: 2015-2019 (5-Year Estimates)
C16001 (Tracts) – Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

The following maps show the distribution of people with LEP throughout RTD's service area according to American Community Survey data. The first map shows the population distribution of all people with limited English proficiency over the age of 5; the subsequent maps show the population distribution of the service area's

three most popular spoken languages other than English: Spanish, Vietnamese and Chinese.[67] This data illustrates that the highest populations of all LEP speakers concentrate in North and Northeast Denver; East Lakewood; and Northwest, North and Northeast Aurora. Variations exist between LEP speakers of different languages, however. For instance, concentrations of LEP Vietnamese and Chinese speakers are more likely to be dispersed across the outer portions of RTD's service area, where LEP Spanish speakers are more likely to concentrate in the Metropolitan Denver urban core.

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[6] Please refer to the Four Factor Analysis in the Exhibit for population distributions of other languages according to the ACS.

Figure 5. ACS Distribution of All Limited English Proficient Speakers (Age 5+)
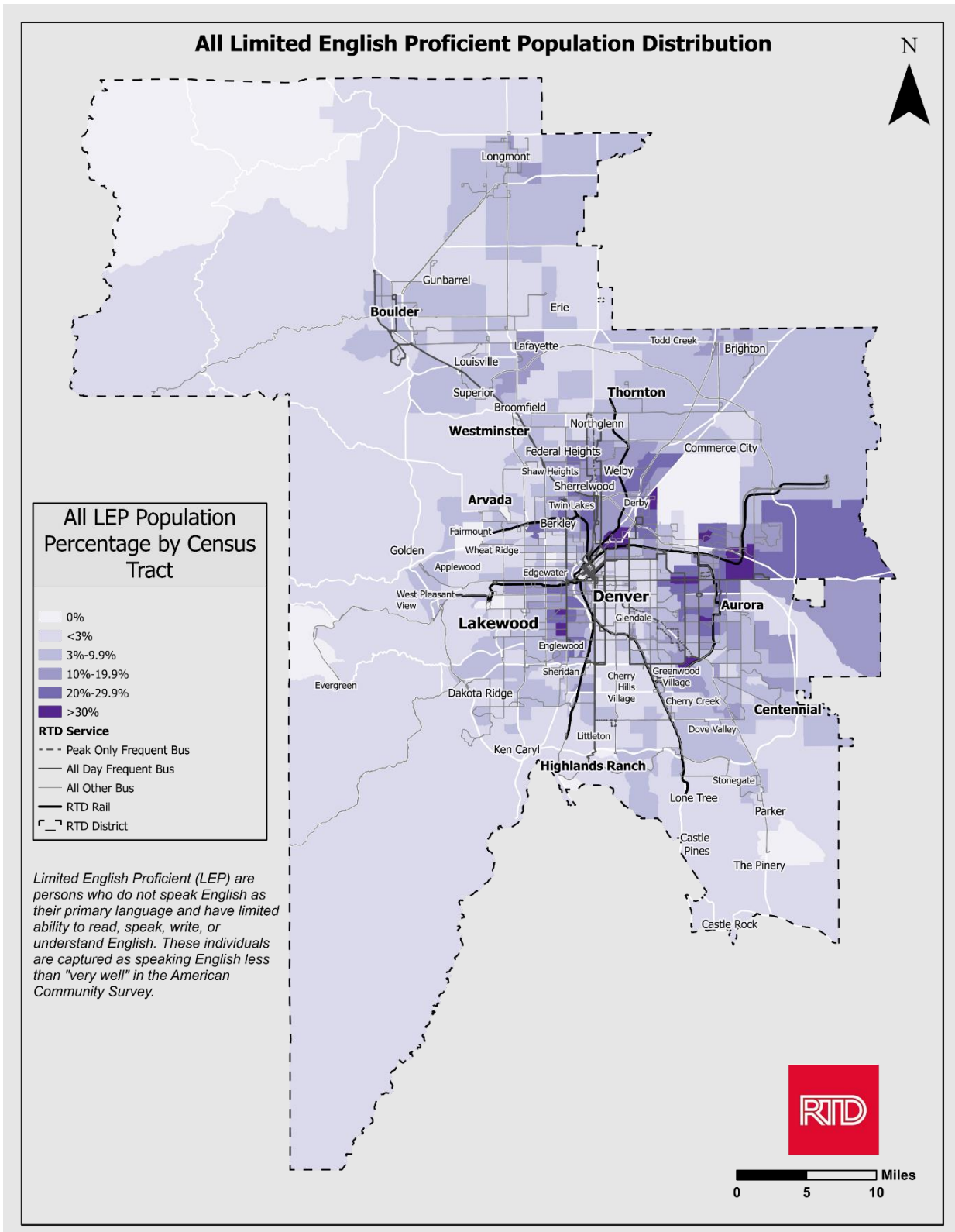
Figure 6. ACS Distribution of Spanish Speakers (Age 5+) Who Are Limited English Proficient
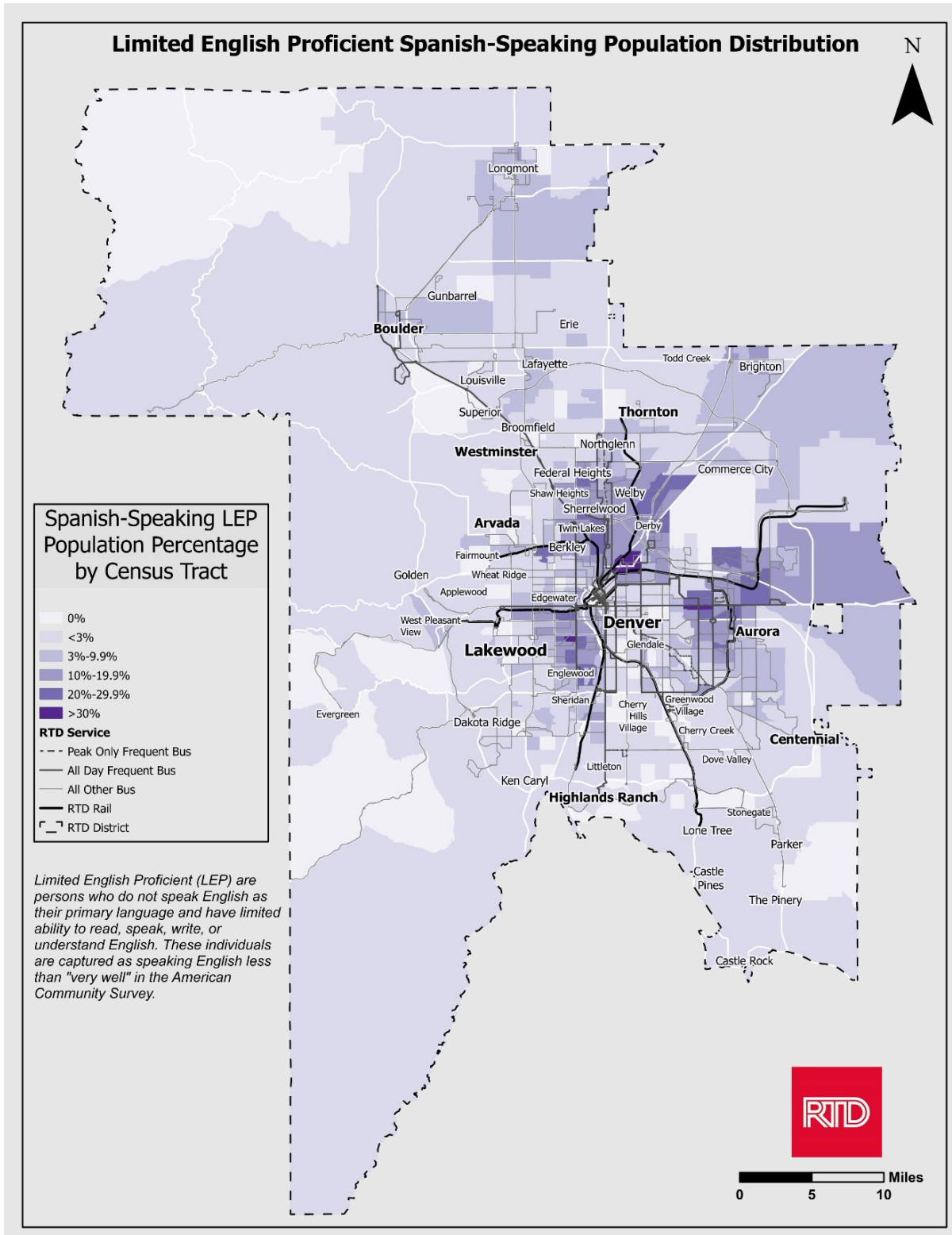
Figure 7. ACS Distribution of Vietnamese Speakers (Age 5+) Who Are Limited English Proficient
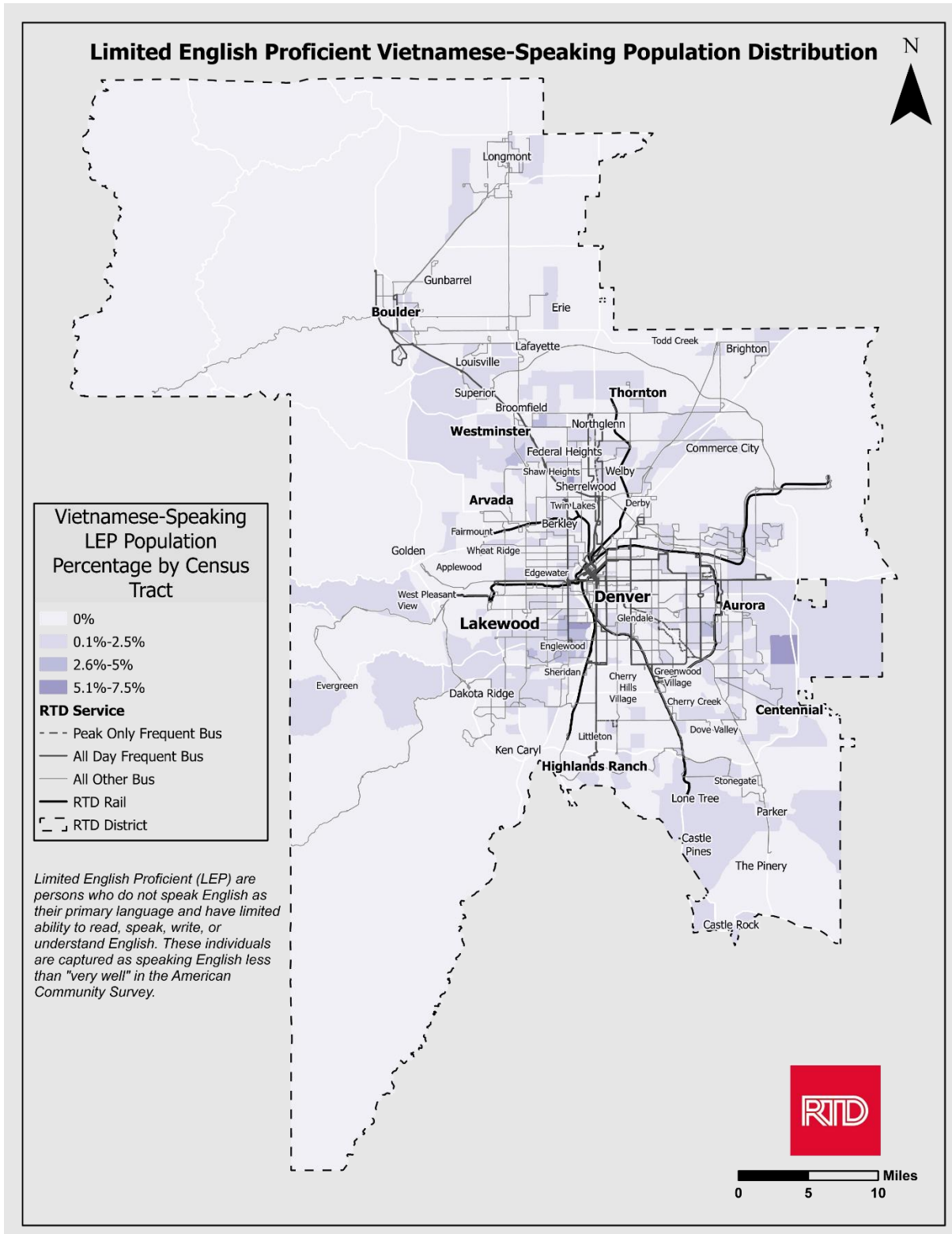
Figure 8. ACS Distribution of Chinese Speakers (Age 5+) Who Are Limited English Proficient
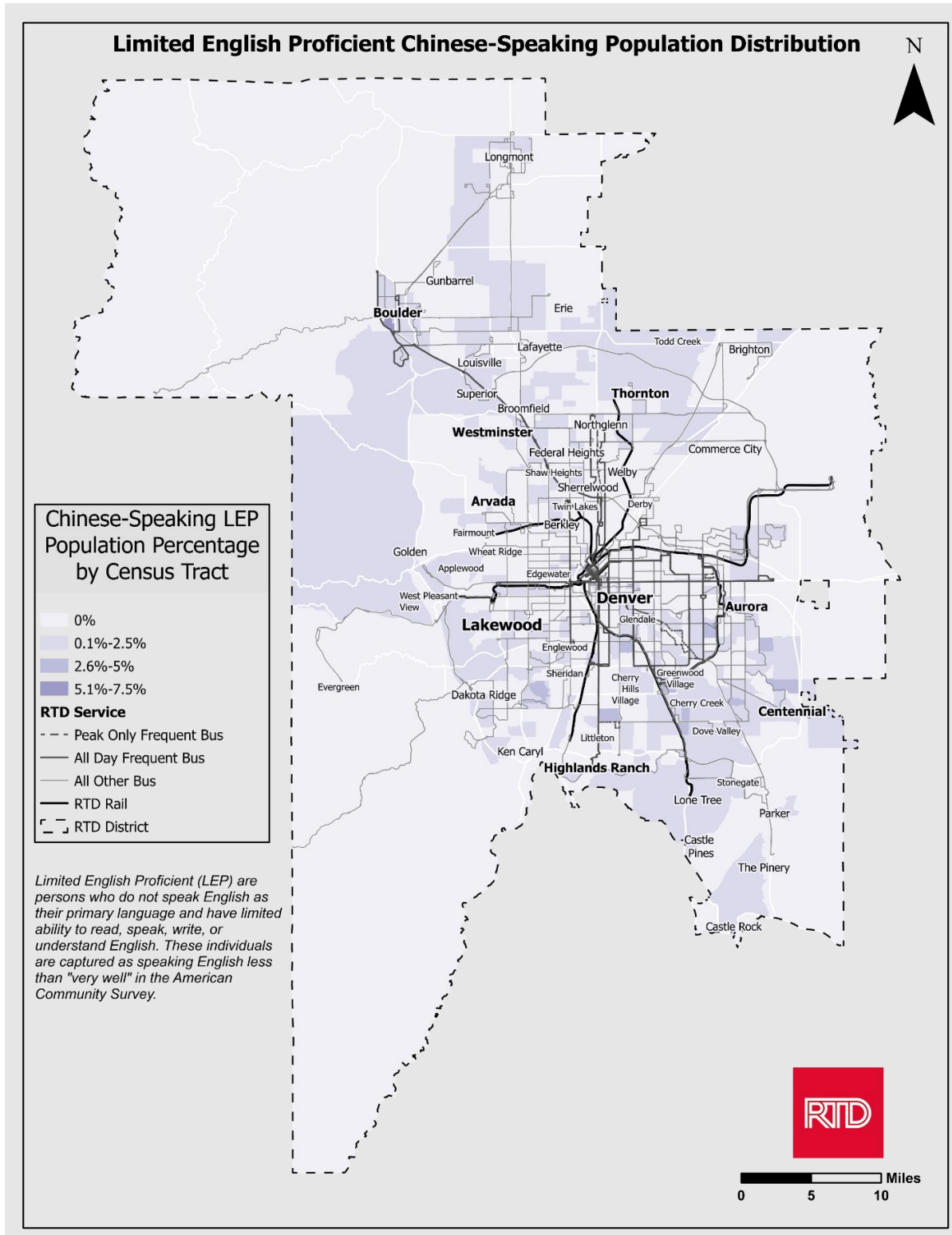
Public Use Microdata Sample (PUMS)

To ascertain whether there are other potential language groups that meet the Safe Harbor Threshold using data outside the ACS, RTD's Market Research and Transit Equity Office conducted an analysis of Public Use Microdata Sample (PUMS), Colorado Department of Education and Colorado Health Authority data as well.

PUMS supplements the ACS estimates and allows RTD to take a deeper dive into grouped ACS language categories, such as African languages (e.g., Somali, Amharic). Consequently, in addition to Arabic, Chinese, French, German, Korean, Russian, Spanish (Mexico), Tagalog and Vietnamese being considered as safe harbor languages, PUMS data adds Amharic, Farsi (Persian), Hindi, Hmong, Japanese, Khmer (Cambodian), Laotian, Nepali (Nepalese), Somali, Swahili, Telugu and Thai to the list.

Figure 9. Languages Spoken by LEP Persons Age 5 and Older in RTD District from PUMS

Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	161,436	4.7%	68.9%
Vietnamese	10,067	0.3%	4.3%
Chinese (incl. Mandarin, Cantonese)	9,724	0.3%	4.1%
Amharic, Somali, or other Afro-Asiatic languages	6,351	0.2%	2.7%
Korean	4,917	0.1%	2.1%
Russian	4,913	0.1%	2.1%
Nepali, Marathi, or other Indic languages	3,157	0.1%	1.3%
Arabic	3,108	0.1%	1.3%
Other languages of Asia (incl. Khmer, Hmong)	3,046	0.1%	1.3%
French (incl. Cajun)	2,684	0.1%	1.1%

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Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Thai, Lao, or other Tai-Kadai languages	1,806	0.1%	0.8%
Persian (incl. Farsi, Dari)	1,637	0.0%	0.7%
Tagalog (incl. Filipino)	1,493	0.0%	0.6%
Japanese	1,464	0.0%	0.6%
Hindi	1,427	0.0%	0.6%
Swahili	1,372	0.0%	0.6%
Other Indo-European languages (incl. Albanian, Lithuanian)	1,286	0.0%	0.5%
German	1,282	0.0%	0.5%
Yoruba, Twi, Igbo, or other languages of Western Africa	1,273	0.0%	0.5%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	1,142	0.0%	0.5%
Telugu	995	0.0%	0.4%

Source: U.S. Census Public Use Microdata Sample Tables: 2015-2019 (5-Year Estimates).

Figure 10. Languages with LEP Populations ≥ 1,000

Language	Population
Spanish	161,436
Vietnamese	10,067
Chinese (incl. Mandarin, Cantonese)	9,724
Amharic, Somali, or other Afro-Asiatic Languages	6,351
Korean	4,917
Russian	4,913
Nepali, Marathi or Other Indic Languages	3,157
Arabic	3,108
Other Languages of Asia (incl. Khmer, Hmong)	3,046
French (incl. Cajun)	2,684
Thai, Lao, or other Tai-Kadai Languages	1,806
Persian (incl. Farsi)	1,637
Tagalog (incl. Filipino)	1,493
Japanese	1,464
Hindi	1,427
Swahili	1,372
Other Indo-European languages (incl. Albanian, Lithuanian)	1,286
German	1,282
Yoruba, Twi, Igbo, or other languages of Western Africa	1,273
Ilocano, Samoan, Hawaiian, or other Austronesia	1,142
Telugu	995

Source: U.S. Census Public Use Microdata Sample Tables: 2015-2019 (5-Year Estimates).
B16001 (PUMS) – Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

The following PUMS maps show LEP Spanish, Vietnamese and Chinese-speaking populations, indicating areas that are above or below the percent of the total population for that language group (see Figure 11). The remaining maps can be viewed in the Exhibit: Four Factor Analysis.

Figure 11. PUMS Distribution of Spanish Speakers (Age 5+) Who Are Limited English Proficient
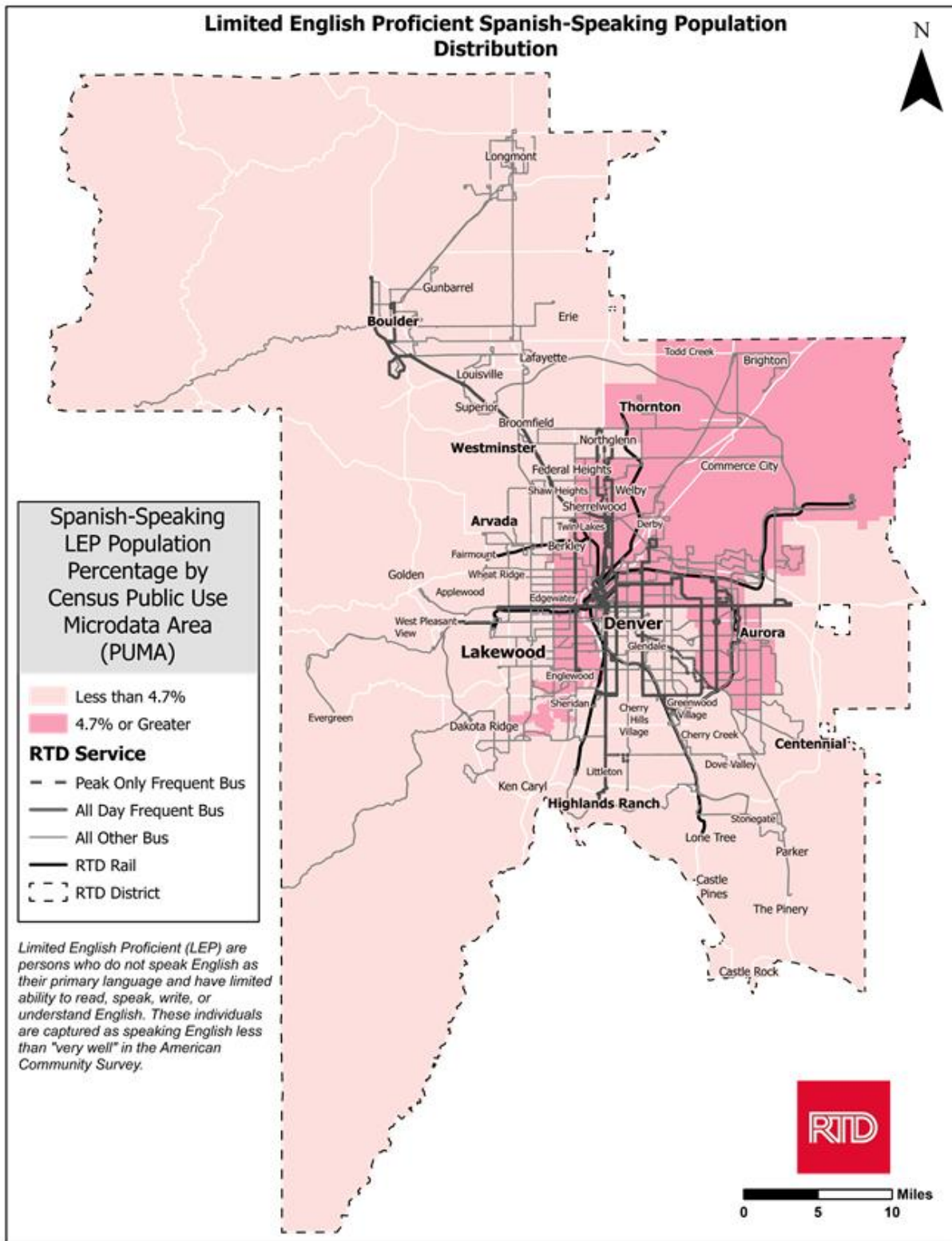
Figure 12. PUMS Distribution of Vietnamese Speakers (Age 5+) Who Are Limited English Proficient
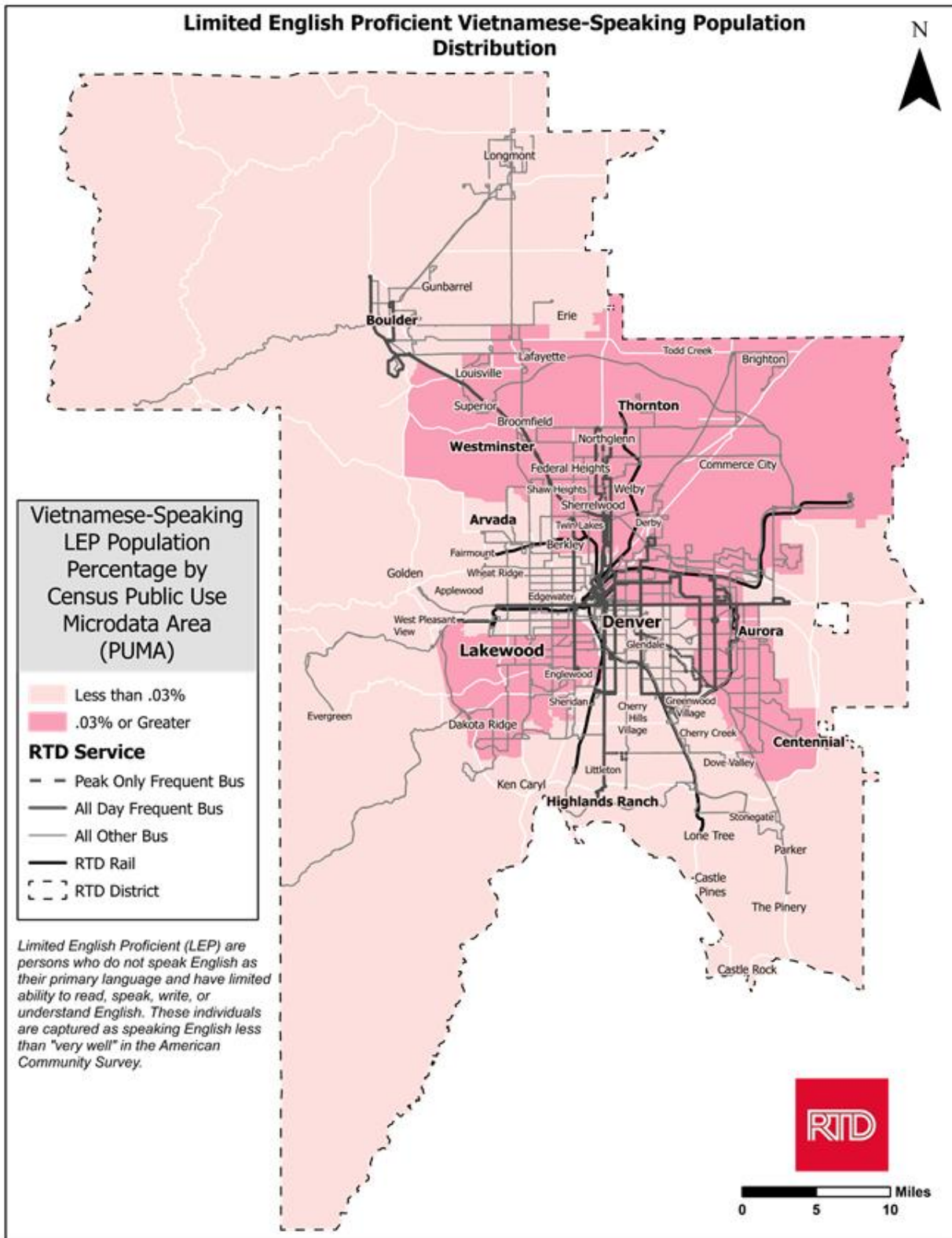
Figure 13. PUMS Distribution of Chinese Speakers (Age 5+) Who Are Limited English Proficient
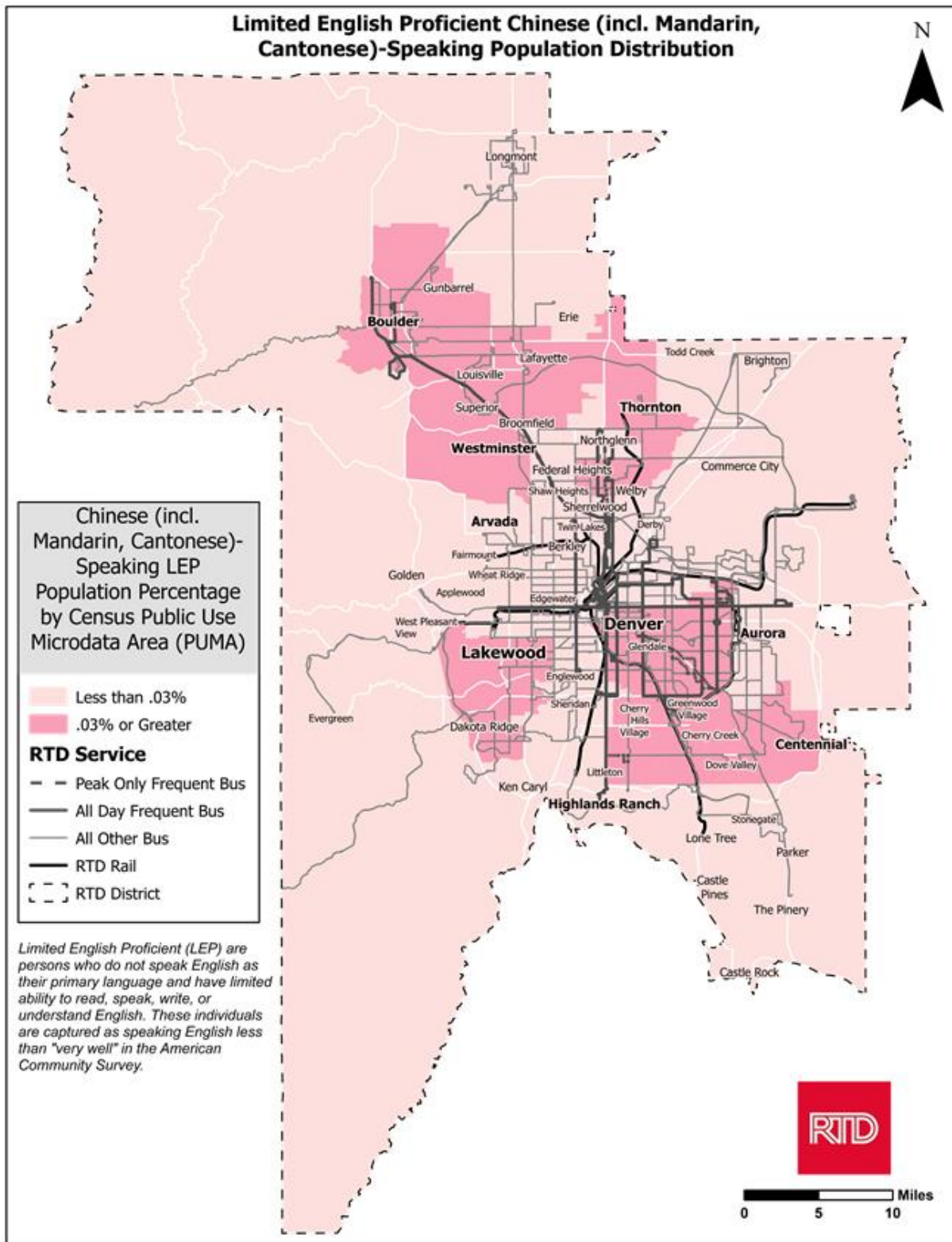
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Colorado Department of Education (CDE)

In addition to considering the ACS and PUMS estimates, RTD's Factor 1 analysis examined the most recent data on the Student Language Spoken at Home from the Colorado Department of Education (CDE) for the 2020-2021 school year, which includes students ranging from kindergarten to high school. It is assumed that if children are identified as speaking a language other than English at home, then their parents or adult guardians are likely to speak the same language. While this data set does not identify the number of people above the school age that speak a language other than English, it can be a helpful complement to U.S. Census data.

Data were compiled from the following school districts serving students within the RTD district boundaries.[8]

Figure 14. School Districts Included in Analysis

School Districts Included in Analysis			
Adams 12 Five Star Schools	Cherry Creek 5	Englewood 1	Mapleton 1
Adams County 14	Clear Creek RE-1	Expeditionary BOCES	School District 27J
Adams-Arapahoe 28J	Denver County 1	Gilpin County RE-1	Sheridan 2
Boulder Valley Re 2	Douglas County Re 1	Jefferson County R-1	St Vrain Valley RE1J
Byers 32J	Education reEnvisioned BOCES	Julesburg Re-1	Weld County School District RE-3J
Charter School Institute	Elizabeth School District	Littleton 6	Westminster Public Schools

While CDE data is largely in line with ACS and PUMS data regarding the top languages spoken by LEP persons, Spanish accounts for an even larger percentage of the LEP population here. Additionally, Arabic replaces Chinese as the third-most spoken language.

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[8] RTD included school districts that have a minimum of 1 individual school with a zip code within RTD's service area.

Figure 15. Languages Spoken at Home for School Districts within RTD Service District 2020-2021

Language	Number of Students[9]	Percent of Students[10]
Spanish	96,008	77.0%
Vietnamese	3,123	2.5%
Arabic	3,001	2.4%
Chinese	2,475	2.0%
Russian	2,214	1.8%
Amharic	2,083	1.7%
Nepali	1,225	1.0%
Korean	1,147	0.9%
French	1,021	0.8%

Source: Colorado Department of Education: Languages Spoken at Home

Colorado Health Authority

Finally, data were also compiled from participating Colorado Women, Infant and Child (WIC) clinics in Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson and Weld counties. The date range was from January 1, 2019 to January 1, 2020. In total, there were 12 distinct languages spoken by clients frequenting the clinics. Table 5 shows a frequency count of unique clients by spoken language.

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[9] RTD included all students who speak a language other than English at home in the analysis. This includes students who classify as English Language Learners (ELL) and students whose primary language is something other than English but spoke English fluently upon entering school.

[10] The CDE redacts data where there are less than 16 foreign language speakers in a school district. RTD utilized data that were not anonymized, therefore the percentages listed are estimates and should not be used to determine safe harbor languages.

Figure 16. Spoken Languages of WIC Clients within the RTD Service Area For 2019[11]

Language	Number of WIC Clients	Percent of Clients[12]
Spanish	8,550	73.2%
Unknown	918	7.9%
Other	836	7.2%
Arabic	339	2.9%
Amharic	282	2.4%
Somali	222	1.9%
French	191	1.6%
Nepali	113	1.0%
Tigrinya	63	0.5%
Vietnamese	60	0.5%
Burmese	57	0.5%
Swahili	57	0.5%

Source: Colorado Women, Infant and Child Clinic: Language Spoken (2019)

WIC data corroborates PUMS findings that Amharic, Nepali, Somali and Swahili should also be paid attention in language assistance measures. It also found that two other languages that had not appeared in other data sets – specifically, Burmese and Tigrinya – are spoken at WIC Clinics. However, given their low prevalence in ACS and PUMS findings, RTD has omitted them from consideration of the current list of safe harbor languages.

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[11] Colorado Department of Public Health and Environment does not disclose the exact number of clients where a language spoken at home is less than 50 per county in order to protect privacy.

[12] RTD utilized data that were not anonymized, therefore the percentages listed are estimates and should not be used to determine safe harbor languages.

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Summary

From Factor 1 of RTD's Four Factor Analysis, RTD can draw crucial conclusions about which languages should be prioritized in language assistance measures and where such measures are most needed geographically. First and foremost, Factor 1 allows RTD to establish a list of 21 safe harbor languages to guide language assistance. These languages are (in alphabetical order):

1. Amharic
2. Arabic
3. Chinese (Simplified)
4. Farsi (Persian)
5. French (European)
6. German
7. Hindi
8. Hmong
9. Japanese
10. Khmer (Cambodian)
11. Korean
12. Laotian
13. Nepali (Nepalese)
14. Russian
15. Somali
16. Spanish (Mexico)
17. Swahili
18. Tagalog (Filipino)
19. Telugu
20. Thai
21. Vietnamese

These safe harbor languages can then be organized by tiers of relative need for translation or interpretation services district-wide and reflect each language's rank based on the average of all four data sources in Factor 1.

Figure 17. RTD's 3 Language Tiers

Tier 1 Language Group	Tier 2 Language Groups	Tier 3 Language Groups
Spanish	Vietnamese	Amharic
	Chinese (Simplified)	Korean
		Russian
		Nepali

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Tier 1 Language Group	Tier 2 Language Groups	Tier 3 Language Groups
		Arabic
		Khmer (Cambodian)
		French
		Japanese
		Farsi (Persian)
		Tagalog
		Swahili
		Hindi
		German
		Somali
		Laotian
		Hmong
		Thai
		Telugu

Ensuring that Spanish, Vietnamese and Chinese – as the most common languages spoken by people with limited English proficiency – receive attention when it comes to translation of vital documents, interpretation and other language efforts is especially important. While RTD has done some work to provide assistance for Spanish speakers, and resources such as telephone interpreters give support in other languages (see *Language Assistance Measures Employed by RTD* for more detail), much work remains to expand upon Spanish language access as well as establishing a more solid foundation in other languages.

Data from Factor 1 also allow RTD to most strategically pursue language assistance measures based on the spatial concentrations of LEP populations. Transit routes and other activities located near high concentrations of LEP (specifically, North and Northeast Denver; East Lakewood; and Northwest, North and Northeast Aurora) warrant the most attention to language access.

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Factor 2: Frequency of Contact with LEP Persons by RTD Services

Following Factor 1, Factor 2 in the USDOT LEP Guidance requires RTD to assess, as accurately as possible, the frequency with which the agency interacts with LEP persons from different language groups. The more frequent the contact, the more likely enhanced language services will be needed. Consequently, the reasonable language assistance measures that RTD takes to serve a rarely encountered LEP population (e.g., Ilocano) will be very different than those taken for an LEP population that is encountered daily (e.g., Spanish).

To complete the Factor 2 assessment and understand the frequency of contact RTD has with people of limited English proficiency, RTD conducted surveys with frontline employees who interact with customers. RTD also collected the following data sources:

- Frontline employee survey data

- Customer satisfaction survey data

- Telephone information center data

- Access-a-Ride call data

- Website visitation data

Frontline Employee Data

Since frontline staff are often the first contact LEP community members have with RTD, RTD sought to answer the following questions (among others):

- How often do frontline employees interact with LEP customers, and where do these interactions take place?

- What types of questions do LEP customers ask frontline employees?

- Do frontline employees have difficulty communicating with people limited in English?

- Are frontline employees aware of materials, services or tools that RTD uses to communicate with people limited in English?

- Are there additional materials, services or tools RTD can use to improve communications?

- What can RTD do to better prepare frontline employees to assist LEP customers?

To find these answers, RTD conducted a survey from May 21, 2021 through June 13, 2021 of frontline

employees. Division Managers and liaisons at RTD-contracted agencies, including Allied Universal Security, Denver Transit Operators, First Transit, MV Transportation, Transdev and Via Mobility Services, distributed the surveys. The survey was offered in both a paper and online format.

The survey closed on June 13, 2021 with 614 responses, including 141 responses to the online version and 473 responses to the paper version.

The survey found that almost all frontline employees interact with community members a few times per week or more (96%), with 76% interacting with community members every day. While interactions with LEP populations were less frequent than those proficient in English, 67% of frontline employees interacted with LEP people a few times per week, with 1 in 4 (26%) reporting daily interaction with LEP people.

Figure 18. Frequency Interacting with All Customers
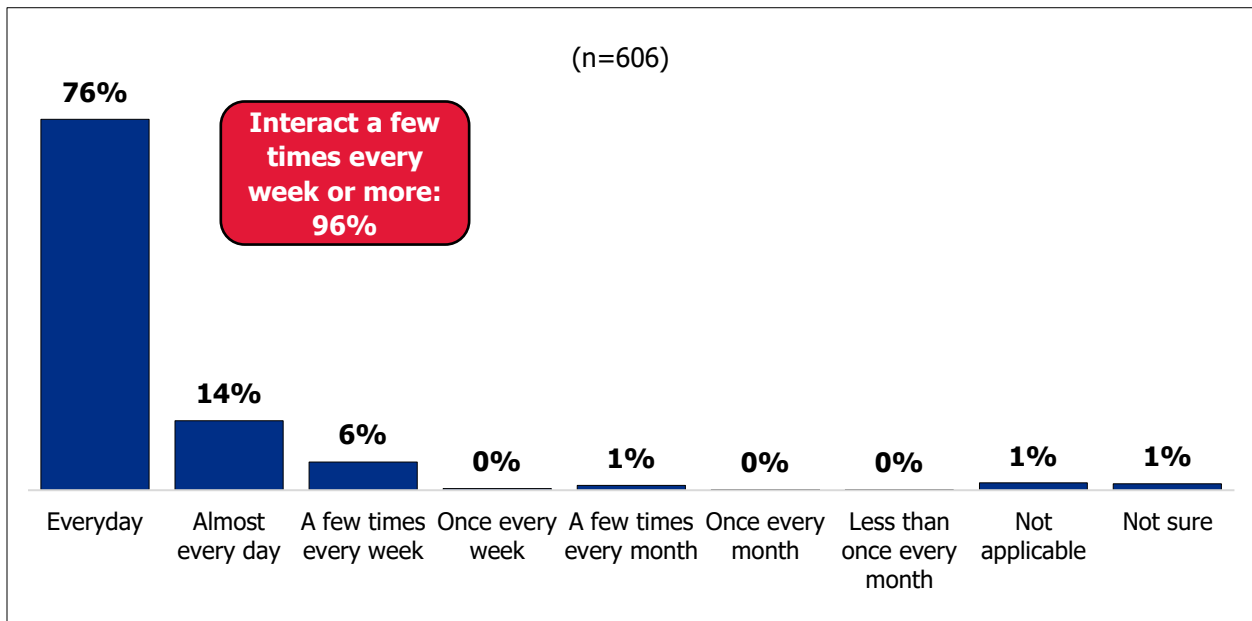
Figure 19. Frequency Interacting with LEP Customers
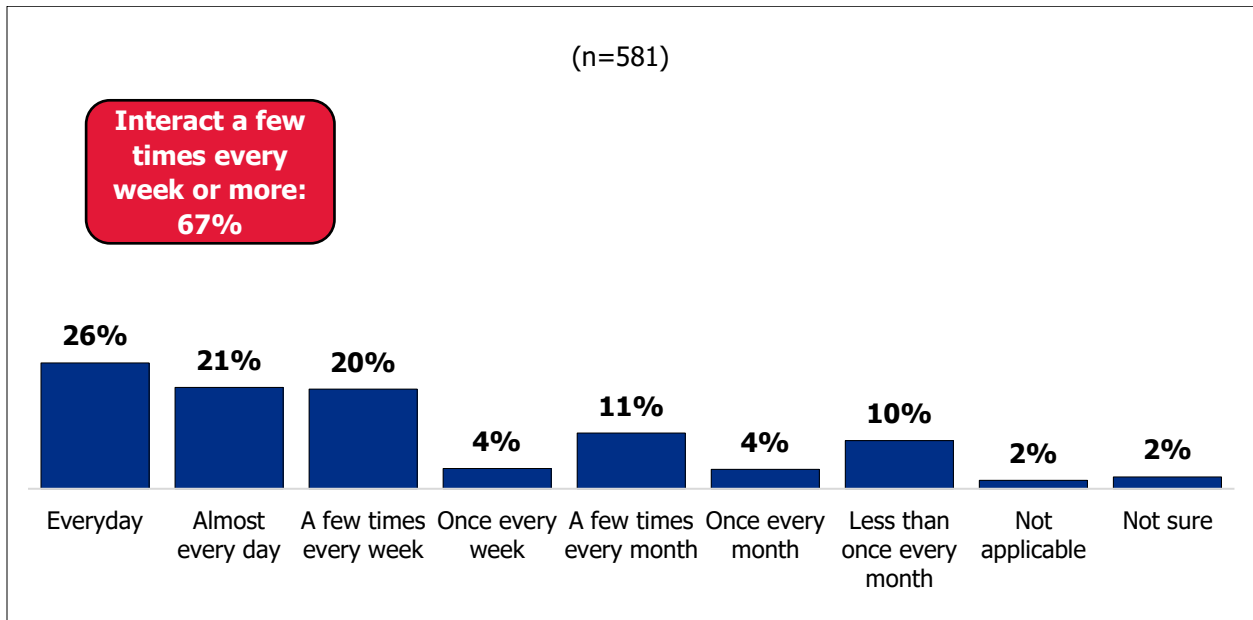
(n=581)

Interact a few times every week or more: 67%

Everyday	Almost every day	A few times every week	Once every week	A few times every month	Once every month	Less than once every month	Not applicable	Not sure
26%	21%	20%	4%	11%	4%	10%	2%	2%

Most interactions with LEP customers occur in-person (89%) followed by over the phone (10%). Most in-person interactions take place on a bus (76%), at a station or stop (32%) or on a train (19%).

Figure 20. How Employees Typically Interact with LEP Customers

(n=561)

In-person	89%
Over the phone	10%
Online	1%
Not sure	2%
Other	2%
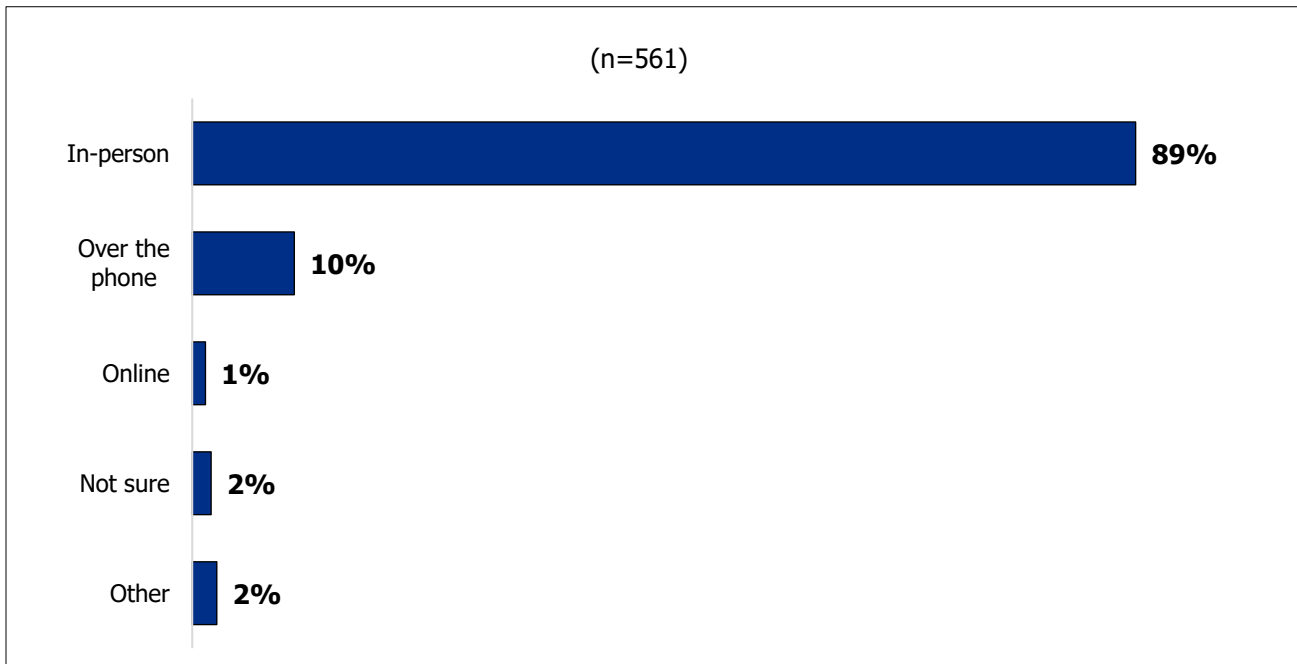
Figure 21. Where Employees Typically Interact with LEP Customers
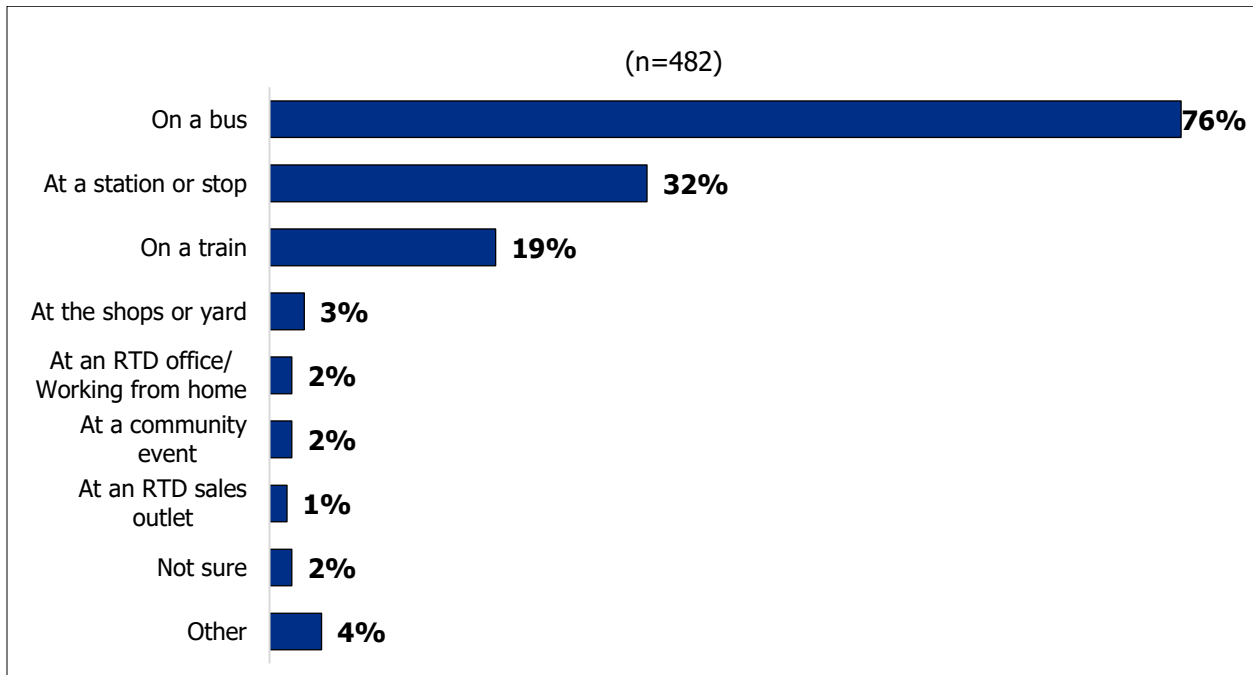
(n=482)

Location	Percentage
On a bus	76%
At a station or stop	32%
On a train	19%
At the shops or yard	3%
At an RTD office/Working from home	2%
At a community event	2%
At an RTD sales outlet	1%
Not sure	2%
Other	4%

Respondents report most LEP customers ask questions about directions or trip planning, fares, schedules or how to buy a ticket.

Figure 22. Topics LEP Customers Ask Questions About

(n=543)

Topic	Percentage
Directions/Trip planning	76%
RTD Fares	68%
RTD schedules	60%
How to buy a ticket or pass	36%
How to use ticket validators	16%
How to file a complaint	10%
How to make a reservation for…	7%
Language interpretation services	7%
Translation of public documents	5%
Not sure	10%
Other	9%
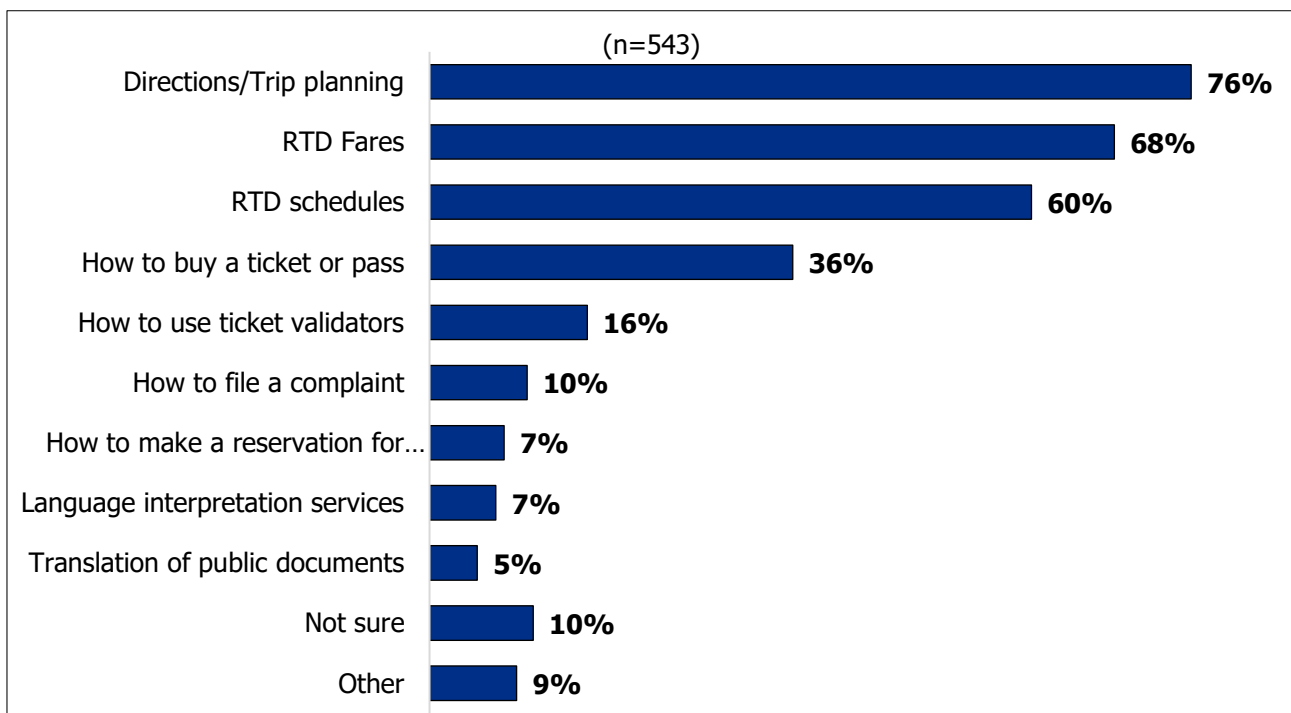
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While frontline employees are typically able to direct customers with limited English proficiency to RTD Customer Care (31%), informational signage (30%) or the RTD website (29%), more than half (57%) of employees report having difficult communicating with LEP customers, and few (35%) feel equipped to speak with them. Even fewer employees (31%) knew about RTD's materials, service and tools available to help them communicate with LEP customers.

Figure 23. Difficulty Communicating with LEP Customers
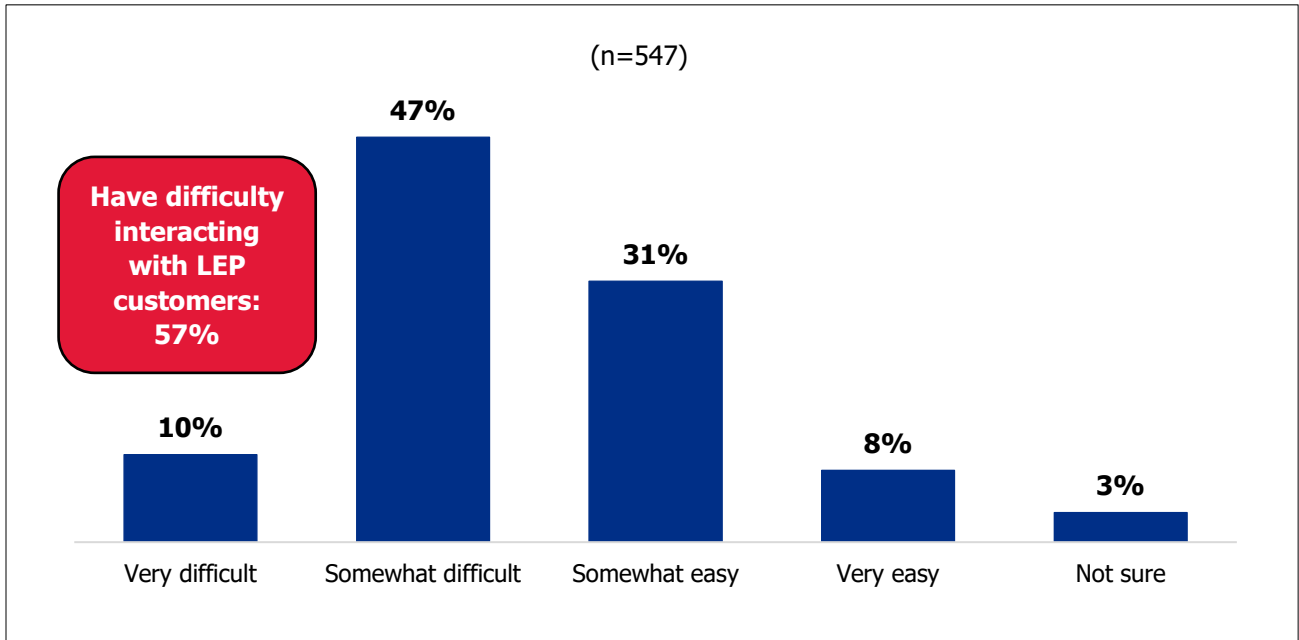
Figure 24. Feel Equipped to Communicate with LEP Customers
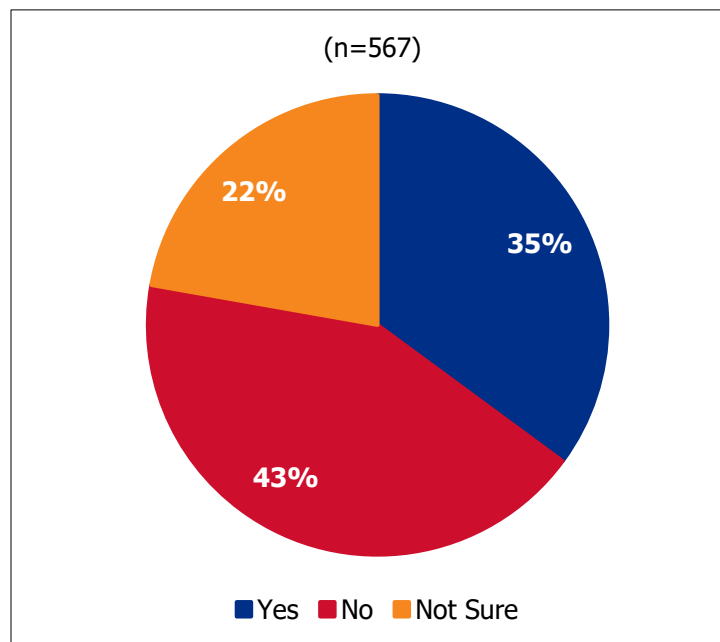
Figure 25. Aware of RTD LEP Materials, Services, Tools

(n=543)

31%	54%	15%

■ Yes ■ No ■ Not sure
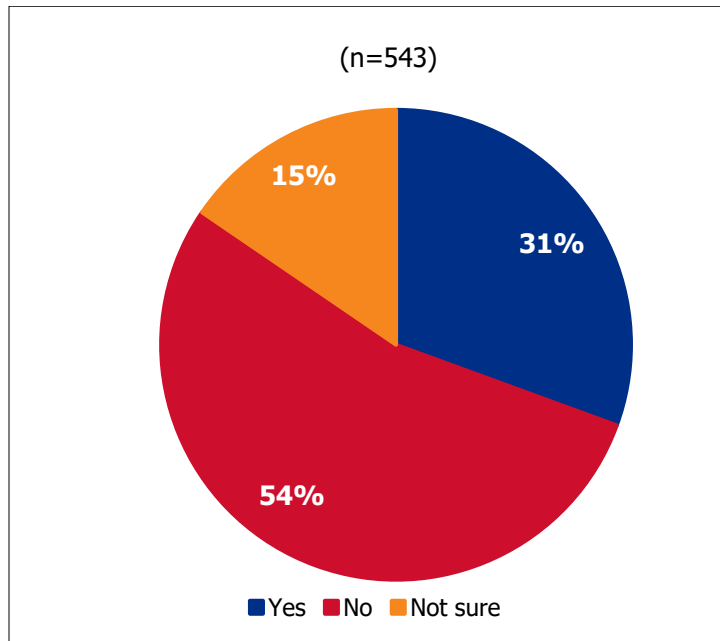
To help better communicate with LEP customers, frontline staff recommend that RTD provide more translated materials (e.g., brochures, announcements, signage, cards with translations of common phrases, fare information, and schedule information), a translation device, a direct phone line for translation services, and language classes for the most frequently encountered languages.

Figure 26. Translated Materials to Improve Communication with LEP Customers

Materials for Translation
Announcements
Signage
Cards with translation of common words/phrases
Brochures/Pamphlets
Fare information
Schedule

Furthermore, a training program that outlines the processes for communicating with LEP customers (including

the materials, tools and services available) could help improve frontline communications with LEP customers. Hiring more bilingual frontline employees could also prove useful.

RTD Telephone Information Center Data

RTD's Telephone Information Center (TIC) is one of many ways RTD fulfills its commitment to providing quality customer service to all its potential transit users. RTD's TIC has 27 full-time Information Specialists answering incoming calls from customers requesting route information, filing complaints and making suggestions and comments for response by e-mail, telephone or mail.[13]

Presently, TIC experiences a limited demand for language assistance. TIC does accommodate LEP Spanish speakers by staffing 11 full-time bilingual Information Specialists; however, the demand for language assistance from Spanish speakers seems low, given the proportion of LEP Spanish speakers in the RTD service area. To illustrate, in the period of April 2021 to March 2022 (the 12 months prior to drafting this LAP), the TIC received 565,500 calls, with only 18,610 (3.29%) of those calls requiring language assistance for Spanish speakers.

Figure 27. Phone Calls Received in English and Spanish, April 2021-March 2022

English		Spanish	
Month	Calls	Month	Calls
April	44,444	April	1,020
May	43,526	May	1,464
June	48,254	June	1,514
July	49,938	July	1,641
August	50,621	August	1,879
September	48,767	September	1,712
October	45,735	October	1,632
November	41,964	November	1,597

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[13] Notably, the 27 Information Specialists listed here are a significant drop from the 47 reported in RTD's Title VI Update. This is a consequence of staffing shortages related to the COVID-19 global pandemic.

English		Spanish	
December	43,973	December	1,533
January	45,079	January	1,564
February	40,167	February	1,459
March	44,422	March	1,595

Access-a-Ride Call Data

RTD's Access-a-Ride has 21 full-time reservationists answering incoming calls from customers requesting Access-a-Ride trips. Presently, the service has experienced limited demand for language assistance. The Access-a-Ride Call Center, operated by First Transit, began utilizing phone interpretation services, May 2021. Since May 2021, out of a total of 154,874 incoming calls, 135 (0.087%) requested Spanish interpretation. 4 (0.003%) calls were for Mandarin and 3 (0.002%) were for Russian.

RTD Website Visitation Data

In 2021 we had a total of 32 million page views, 9.2 million sessions, and 3.6 million users on the RTD website (www.RTD-denver.com).

RTD can track the default language of a visitor to the agency's website, providing some indication of the amount of default device or "in-browser" translation. For example, operating systems such as Apple support localized translations in dozens of languages so that users can automatically display content in the language of their choice on their device. Browsers like Google Chrome, Mozilla Firefox and Microsoft Edge also offer in-browser translations, giving users the opportunity to translate information while surfing the web.

Below is a percentage breakdown of the top 10 languages used by our visitors from January 1, 2021 to December 31, 2021. Most website visitors view the RTD website in English (97.5% of the 3.6 million total users); visitors who translate the website from English into their preferred language account for less than 2.5% of total visitors, excluding crawlers (bots).

Figure 28. Languages Used by Visitors on RTD Website

Top 10 Languages Used by Visitors to RTD Website (as a Percent of Total Visitors)	
English	97.5%
Spanish	0.87%

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Top 10 Languages Used by Visitors to RTD Website (as a Percent of Total Visitors)	
Simplified Chinese	0.69%
French	0.13%
German	0.06%
Crawlers (bots)	0.06%
Japanese	0.04%
Korean	0.03%
Russian	0.03%
Portuguese (Brazilian)	0.03%

To further assist in website translation, RTD has historically offered the Google Translate widget. However, Google deprecated the widget in 2019 and, consequently, will no longer update it. While RTD will continue to offer the widget to website visitors in the short-term, it will eventually be removed as it becomes increasingly outdated.

Summary

Factor 2 in the Four Factor Analysis helps ascertain in what mediums language assistance is most needed. Data collected from the frontline employee survey, customer satisfaction survey, telephone information center, Access-a-Ride telephone and the website especially show how important it is to improve language assistance in locations where frontline staff are likely to have face-to-face interactions with people limited in English, such as on transit vehicles or at a stop. Improving language accessibility for trip planning information, fares, schedules or ticket purchases seems to be the most important, given that these are the types of questions frontline staff report receiving the most from LEP persons. Further, staff largely note that it is difficult to communicate with customers limited in English, suggesting that more translated announcements, signage, cards with common words/phrases, brochures and schedules; a translation device; a direct phone line for translation services; and language classes for the most frequently encountered languages would help them better serve LEP people. They are also unfamiliar with the language assistance services RTD does offer, so bolstering staff training on these services is also important.

It is unclear whether the low quantity of telephone requests and website visits in other languages is due to low demand or other factors. For instance, people limited in English may not know the telephone lines or website exist in the first place, they may not have ready access to a computer or (smart)phone or they may be hesitant to use them given real and perceived language barriers. Expanding notice of available language assistance

services such as the bilingual Spanish-English call center representatives could increase demand for these services over time.

Factor 3: Nature and Importance of RTD Services, Programs and Activities

Factor 3 of USDOT's Four Factor Analysis requires RTD to assess the nature and importance of programs, activities or services provided by RTD to people with limited English proficiency. To complete Factor 3, RTD's LAP workgroup conducted surveys with LEP people who use RTD services. The workgroup sought to answer the following research questions:

- How frequently do LEP customers interact with RTD?
- How do LEP customers receive RTD specific information and how do they prefer to receive information?
- How useful are RTD's language assistance services?
- What is the importance of receiving RTD information in their native language?
- How safe and secure do LEP customers feel?
- Are LEP customers aware of RTD's LiVE program?
- How do LEP customers perceive RTD's fare system?
- What are LEP customers' demographics?

RTD conducted a survey from September 7, 2021 through October 31, 2021 to answer the aforementioned questions. Surveys were distributed to LEP persons in collaboration with numerous community-based organizations. Due to lower-than-expected response rates, RTD created a social media campaign to target LEP persons. RTD offered the survey in both a paper and online format, and it was translated into Amharic, Arabic, Chinese, English, French, Korean, Nepalese, Persian, Russian, Spanish and Vietnamese.

The survey closed on October 31, 2021 with 206 responses, including 101 responses to the online version and 105 responses to the paper version. During data collection efforts, RTD collected responses from many people who do not classify as LEP. Their responses were analyzed for potential skews and were deemed too biased to be included in the analysis. Over half (58%) of respondents speak Spanish as their native language, followed by Vietnamese (7%), Chinese (6%) and Nepalese (5%). Almost all respondents either read, write or understand English less than "very well" (87%, 90%, and 88%, respectively).

Concerning the frequency of their interactions with RTD services, the survey found that 1 in 4 survey respondents use RTD daily, with 59% using transit once a week or more. Most respondents (70%) had used RTD prior to the global COVID-19 pandemic. Half of respondents state they use RTD the same now as they did prior to the pandemic; about a third of respondents state they ride RTD less now than they did prior to the pandemic.

RTD

Figure 29. Frequency of Riding RTD

(n=201)

59% of respondents are frequent customers.

- Every day: 25%
- Almost every day: 12%
- A few times every week: 17%
- Once every week: 5%
- A few times every month: 8%
- Once every month: 1%
- Once every few months: 3%
- A few times in the past 12 months: 5%
- Once in the past 12 months: 3%
- I have not used RTD in the past 12 months: 17%
- 0%
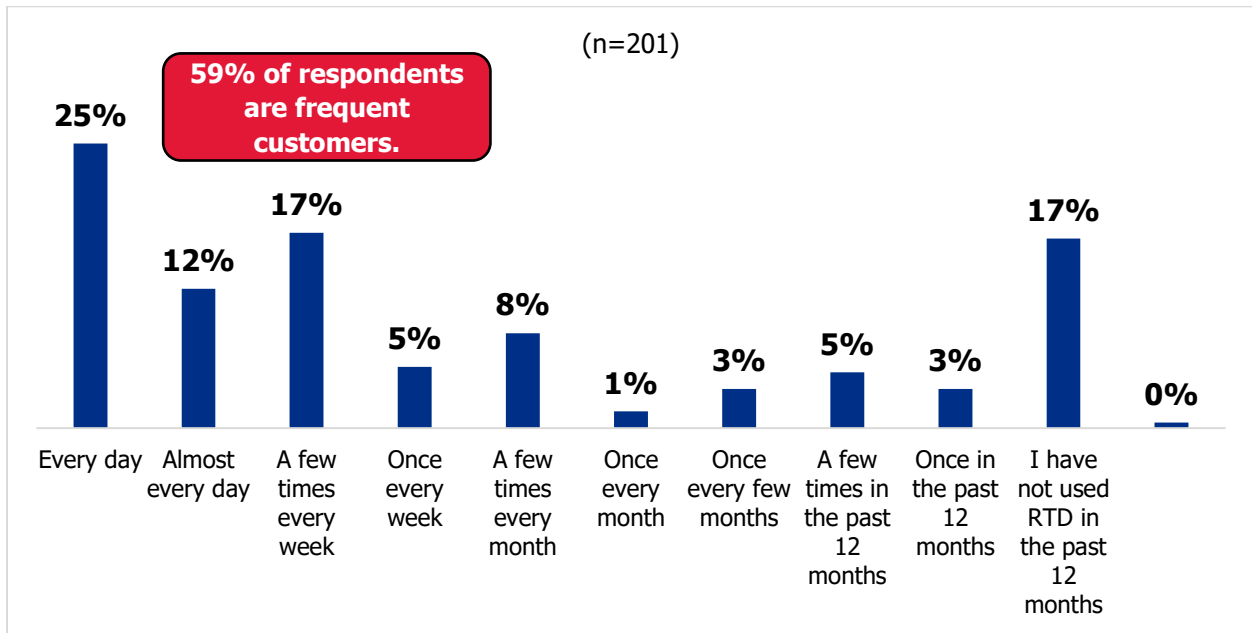
Figure 30. Change in Ridership Due to COVID-19

(n=144)

- I ride RTD less often now than before the Covid-19 pandemic: 30%
- I ride RTD about the same now as before the Covid-19 pandemic: 51%
- I ride RTD more often now than before the Covid-19 pandemic: 17%
- Not applicable – I did not use RTD before Covid-19 spread in March 2020: 6%
- Not sure: 4%
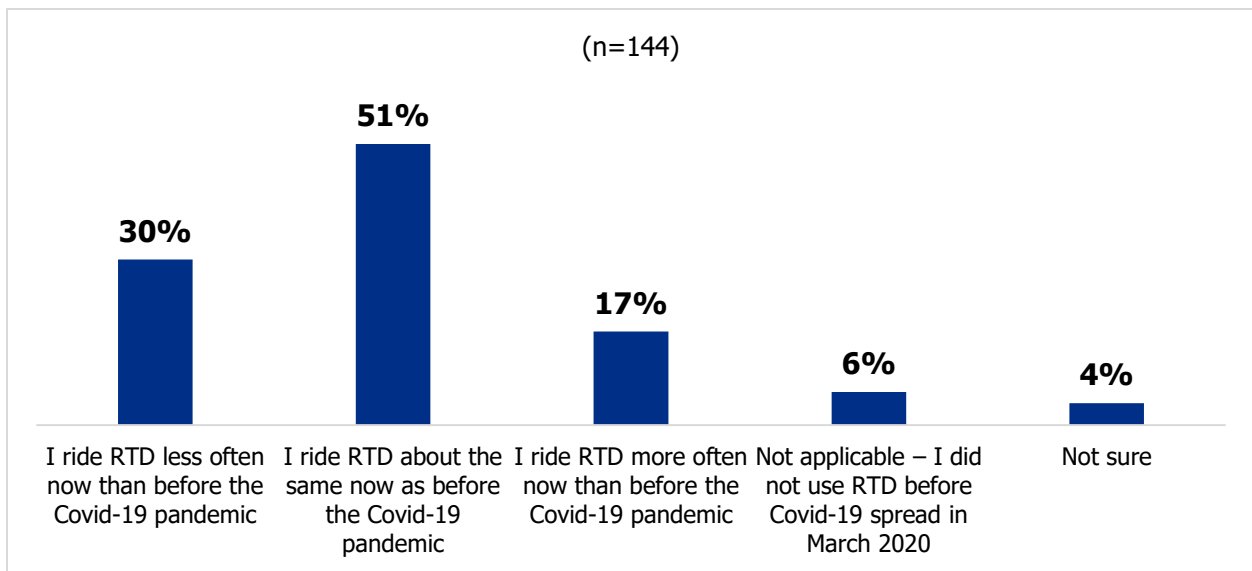
Customers with limited English proficiency receive information about RTD in numerous ways. The top five cited information sources were the RTD website (28%), signs at transit stops (25%), RTD customer service (21%), family or friends (19%), and from signs on buses or trains (19%).

Figure 31. How LEP Customers Get Information about RTD

(n=202)

Category	Percentage
RTD website	28%
Signs at a bus/train stop	25%
RTD Customer Service	21%
Family or friends	19%
Signs on board RTD bus/train	19%
From staff at a community-based organization	12%
RTD's social media accounts	7%
A translation application on a mobile device	6%
RTD sales outlet	6%
Local news program	6%
From RTD staff at a community event	5%
Local news website	4%
RTD employees	3%
Sending an email to RTD	3%
Local newspaper	2%
Brochures at community sites	2%
On the radio	1%
From staff at a faith-based organization	1%
Translation software on a computer	1%
I do not get information regarding RTD services	20%

When asked how they *prefer* to receive information about RTD, LEP persons' preferences slightly differed with the RTD website (32%), signs at transit stops (32%), RTD customer service (25%), signs on board RTD buses or trains (19%), and RTD social media accounts (15%) being their ideal methods of receiving information.

Figure 32. Preferred Method of Receiving Information about RTD

(n=202)

Method	Percent
RTD website	32%
Signs at a bus/train stop	32%
RTD Customer Service	25%
Signs on board RTD bus/train	19%
RTD's social media accounts	15%
From staff at a community-based organization	12%
Family or friends	11%
A translation application on a mobile device	11%
Sending an email to RTD	9%
Local news program	8%
RTD sales outlet	7%
Local news website	6%
Brochures at community sites	5%
Translation software on a computer	4%
RTD employees	3%
On the radio	3%
Local newspaper	3%
From staff at a faith-based organization	2%
From RTD staff at a community event	1%
I do not get information regarding RTD services	6%

The survey also gathered perceptions of RTD's language services. Participants were asked to rate the importance of having translations available for a variety of information on a 5-point scale, where 5 means "very important." How to buy a ticket (84%), where the buses and trains go (83%), and service and schedule changes (81%) are the most important information participants want translated into their native language.

Figure 33. Importance of Having Translations Available

(n=198)

Information	Percent
How to buy a bus or rail ticket	84%
Where buses and trains go	83%
Service and schedule changes	81%
The cost of riding RTD	80%
Safety information	80%
Proposed service and schedule changes	79%
Service alerts for bus or train lines	76%
Language assistance services	74%
How to apply for programs and services	72%
Civil Rights (Title VI) complaint procedure	66%
Free travel training program	62%
Access-A-Ride paratransit service	61%
Public meetings and open houses	52%

It is important to note that customers with LEP differed on the usefulness of RTD's current language translation services. Respondents were asked to rate how useful RTD's language assistance services are on a scale of 1 to 5, with 5 being "very useful." Less than half rated RTD Customer Care (49%), translations through the website (47%) and announcements on the bus or train (45%) a 4 or 5.

Further, access to information has implications for feelings of security. Two in three respondents have felt their security was at risk while using RTD services at some point, but not everyone reported knowing what to do in case of an emergency. Most respondents (69%) know how to follow emergency exit instructions or call RTD Customer Service (51%); fewer know how to call RTD Police (35%), text Transit Watch (26%) or report an incident on the Transit Watch app (25%).

Figure 34. Know What to Do During an Emergency
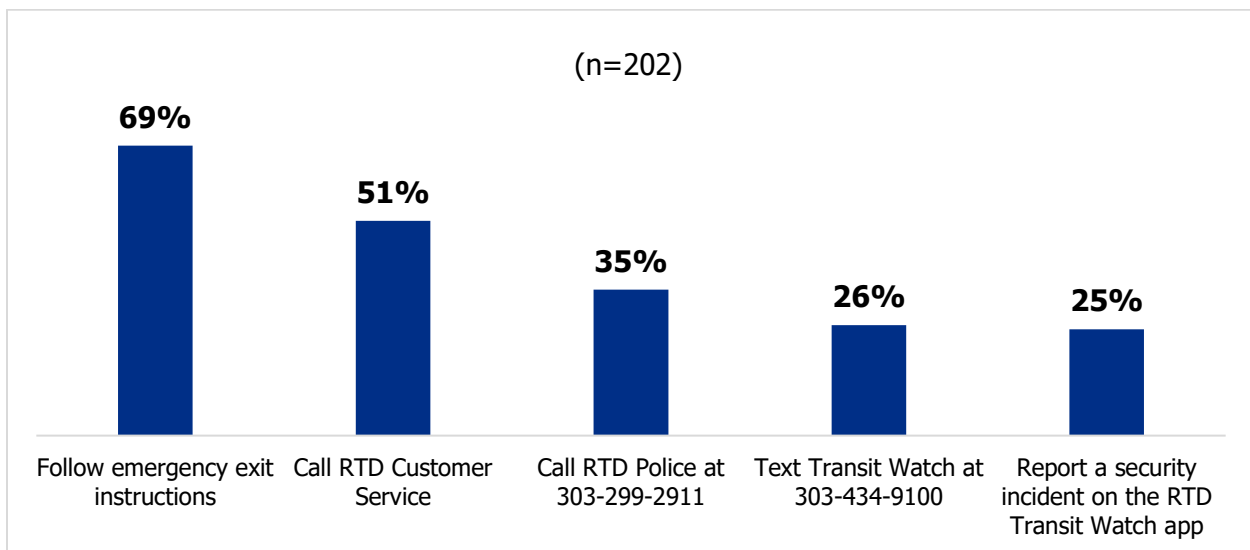
Most respondents are also not aware of RTD's various discount fare programs, which may indicate a gap in language assistance and available translated information. For instance, 68% of LEP survey respondents are not aware of RTD's LiVE program. Further, 15% of survey respondents find that RTD's fare structure is very difficult (6%) or somewhat difficult (9%) to understand, and 44% are unfamiliar with RTD's fare structure.

Figure 35. Attitude towards RTD Fare Structure

(n=198)

Bar	Value
RTD's fare structure is very difficult to understand.	6%
RTD's fare structure is somewhat difficult to understand.	9%
RTD's fare structure is somewhat easy to understand.	18%
RTD's fare structure is very easy to understand.	23%
Not applicable – I am unfamiliar with RTD's fare structure.	44%
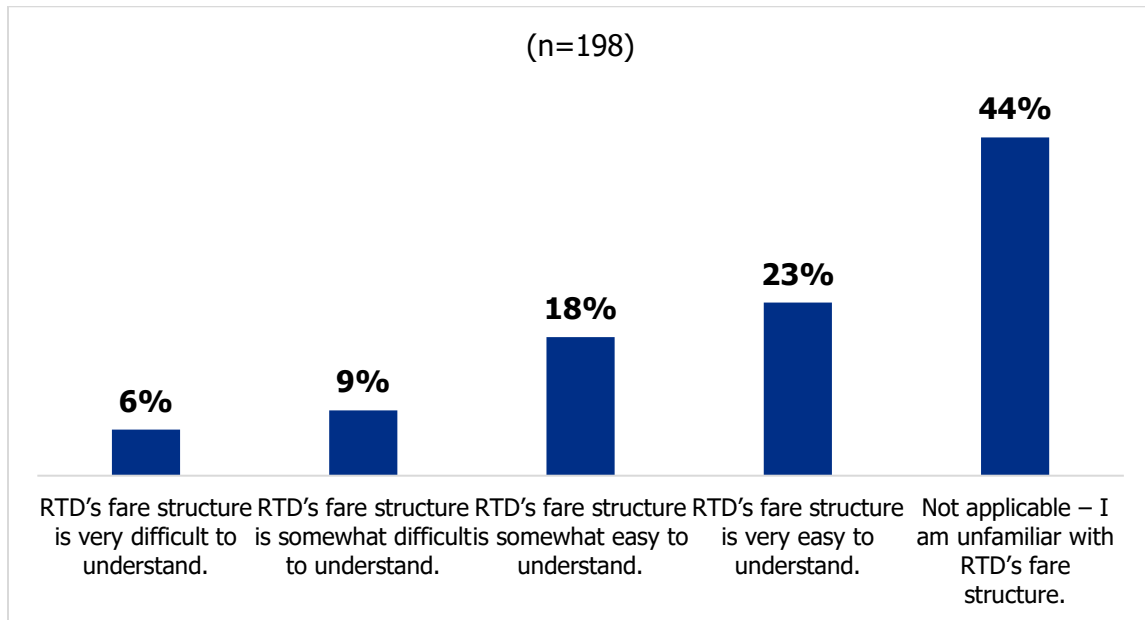
Summary

Though the survey used in RTD's Factor 3 analysis only gathered input from a relatively small percent of RTD's LEP community, it is still illustrative of the nature and important of RTD's various services and activities for people with LEP. Firstly, it demonstrates the high, frequent usage of RTD's services among the LEP population surveyed, and thus reinforces the importance of pursuing reasonable language access measures. It also helps demonstrate which materials, in which format and on what subjects RTD should offer language assistance. The website is noted as a very important source of information for people with LEP. While Factor II found that little translation of the website is performed, RTD recognizes that in-browser translations are not captured by the Factor 2 data. Therefore, it could be worthwhile to at least offer instructions in various languages on how to change one's in-browser language on the RTD homepage. Signage at transit stops and in transit vehicles is also an important source of information for people with LEP. Interestingly, while only 7% of survey respondents showed that they get information from RTD via its social media platforms, 15% would prefer to receive information from RTD via these channels. Examining the prevalence of language assistance on social media as well as expanding advertising of RTD's various social media networks could be a valuable endeavor to meet community members' preferences.

It is important to note that 1 in 5 survey respondents do not receive information about RTD. Thus, in addition to better advertising RTD's social media platforms, RTD could also prioritize providing language access to expand awareness of RTD's various outlets for information, including its email listserv, service alerts, Transit Watch app and beyond.

Finally, in providing language assistance, RTD should focus on the information that people with LEP need the most. This survey indicates that topics of priority should be purchasing fares (and costs of fares), routes and

navigation information, and service changes and alerts. Language-accessible safety information is also crucial to the well-being of people limited in English proficiency, as many participants have felt their safety has been at risk while using RTD but did not know what to do about it (e.g., by reporting an incident on the Transit Watch app). All in all, this survey should be helpful in determining what information, its format, and its location are considered vital for translation and should be targeted for other important language access measures.

Factor 4: Available Resources and Costs of Providing Language Assistance Services

The final factor in the USDOT's Four Factor Analysis is to examine the overall cost and resources available to RTD to provide language assistance. RTD's LAP inter-departmental workgroup conducted this assessment.

As this Plan has mentioned, it is RTD's intention to maintain current language assistance measures that have proven successful while also expanding upon those efforts in the coming years. A good place to begin understanding what our resources are (and could be) to support expanded language efforts is to analyze expenditures for language assistance in recent years. This will provide us a baseline from which we can better analyze costs and resources moving forward.

The analysis shows that RTD spent approximately $176,000 on language assistance measures including telephone interpretation, literature translation, vehicle signage and more (see Figure 36).

Figure 36. LAP Spending Since Last Update June 2019–May 2022

Item	Total
Telephone Interpretation	$632
In-person Interpretation	$130
Brochures/Literature Translation	$7,412
Brochures/Literature Printing Bilingual English/Spanish	$36,000
Customer surveys	$722
Vehicle Signage Printing bilingual English/Spanish	$67,000
Vehicle Signage	$2,400
Channel Cards (vehicle interiors in Spanish)	$2,000

Newspaper digital, and social media ads	$50,000
Civil Rights Title VI Activities	$10,022
Total	**$176,318**

* Not including staff labor

A more complete explanation of these language assistance measures can be found in the next section.

What is not accounted for in this approximate total is the staff costs incurred to provide language access. Various staff from Communications, Bus and Rail Operations, Access-a-Ride, Planning, Service Planning and Transit Equity are often involved in these efforts, as RTD strives to find creative ways to address the diverse customer base it serves. Further, these numbers do not quantify the cost of staff regularly providing their language skills to assist community members with LEP (for instance, 1 in 4 frontline RTD staff who regularly interact with people limited in English proficiency speak a foreign language).

Summary

It is clear that RTD has an opportunity to determine what resources it needs and those that are available to the agency as it expands its language access efforts. The agency is already on its way to doing so by establishing an official language access outreach program, housed within the Transit Equity Office of the Civil Rights Division. With the support of the Transit Equity Specialist (a dedicated LAP coordinator) and overseen by the Transit Equity Manager, the outreach program will begin to establish the "people power" and formalize language access work into dedicated staff time. In this manner, RTD will be better able to determine what resources the agency requires and has available to it for expanded language access, not only including tangible resources such as funding but also intangible ones like community partnerships.

Language Assistance Measures Employed by RTD

RTD currently offers several language assistance services, including (but not limited to):

- Providing telephone interpreters via customer service at 303-299-6000 and via the Access-a-Ride Call Center at 303-292-6560 to assist LEP customers

- Providing bilingual customer information specialists to assist Spanish-speaking customers

- Providing RTD basic customer information in 10 safe harbor languages on the RTD website

- Ability to translate the RTD website into 13 safe harbor languages plus 2 additional languages

- Spanish-language interface for Ticket Vending Machine (TVM) transactions

- Establishing and nourishing partnerships with community organizations that serve LEP populations

- Civil Rights complaint procedures and complaint forms in all safe harbor languages on the RTD website

- Civil Rights public notice in all RTD vehicles and transit centers in top three languages

- Provide information for the LIVE low-income fare program in Spanish language on https://www.rtd-denver.com/LiVE

- Utilization of ethnic media sources (Telemundo Denver, Univision, El Semanrio, La Voz, El Hispano, El Comercio, Latin Life Denver, Asian Avenue Magazine, Colorado Chinese News, Gorizont and Thoi Bao to disseminate information

- Posting English and Spanish service changes, translating presentations and other information on the website

The following are examples of RTD's current language assistance measures.

Figure 37. A Picture of RTD's Ticket Vending Machine Spanish Interface

Figure 38. RTD's Title VI Public Notice

RTD Respects Civil Rights

The Regional Transportation District (RTD) operates its programs and services without regard to race, color, national origin or any other characteristic protected by law. For more information on RTD's nondiscrimination requirements, the complaint procedures, or for information in another language, contact **303.299.6000**; email **titlevicomplaints@rtd-denver.com**; or visit **rtd-denver.com/titlevi**.

RTD respeta los derechos civiles

El Distrito de Transporte Regional (RTD) opera sus programas y servicios sin tener en cuenta la raza, el color, el origen nacional o cualquier otra característica protegida por la ley. Para obtener más información sobre los requisitos de no discriminación de RTD, los procedimientos de reclamación o para obtener información en otro idioma, llame al **303.299.6000**; envíe un correo electrónico a **titlevicomplaints@rtd-denver.com**; o visite **rtd-denver.com/titlevi**.

RTD尊重民权

Regional Transportation District（RTD）在执行计划和提供服务时不考虑种族、肤色、原国籍或受法律保护的任何其他特征。有关RTD的非歧视要求和投诉程序的更多信息，或其他语言的信息，请联系**303.299.6000**；电子邮箱为**titlevicomplaints@rtd-denver.com**；或访问**rtd-denver.com/titlevi**。

RTD Tôn Trọng Các Quyền Dân Sự

Khu Giao Thông Khu Vực (RTD) điều hành các chương trình và dịch vụ của mình không liên quan đến chủng tộc, màu da , nguồn gốc quốc gia hoặc bất kỳ đặc điểm nào khác được pháp luật bảo vệ. Để biết thêm thông tin về các yêu cầu không phân biệt đối xử của RTD, các thủ tục khiếu nại hoặc để biết thông tin bằng một ngôn ngữ khác, hãy liên hệ **303.299.6000**; gửi email đến **titlevicomplaints@rtd-denver.com**; hoặc truy cập **rtd-denver.com/titlevi**.

Figure 39. An RTD Safety Notice in Spanish

¡Esos cables son peligrosos!

Los cables suspendidos encima del tren están cargados de electricidad.

No trate de tocarlos o arrojarles cosas.

Matenga la seguridad alrededor de los trenes

Para más información, visite rtd-denver.com o llame al 303.299.6000.

Figure 40. A Screenshot of RTD's Spanish-Language Introductory Videos to the Discount LiVE Program
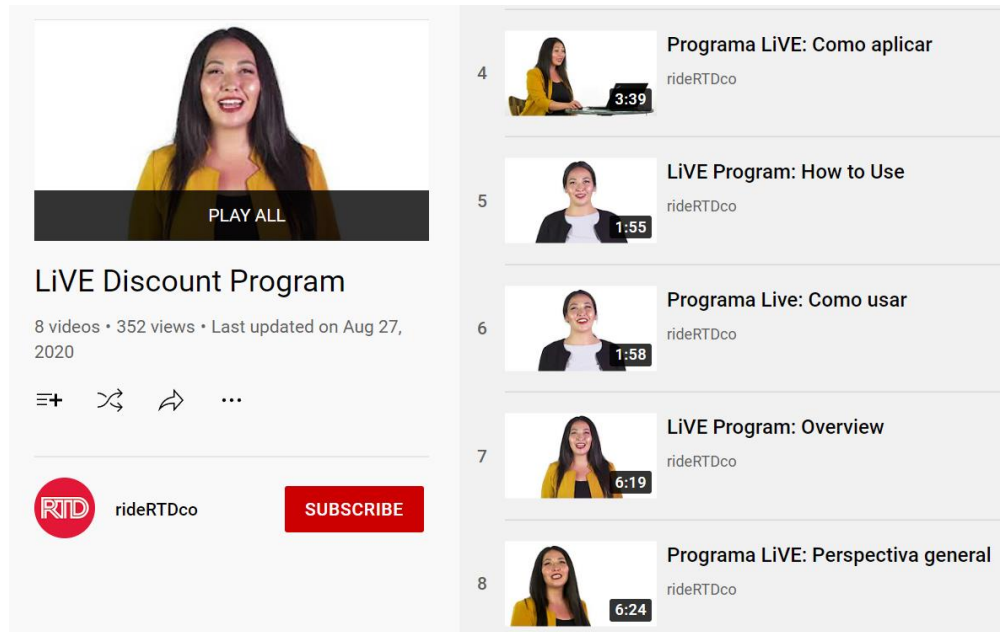
Figure 41. RTD's Spanish-Language Brochure for the LiVE Discount Program

Figure 42. A Screenshot of a Spanish-Language QR Code Ad
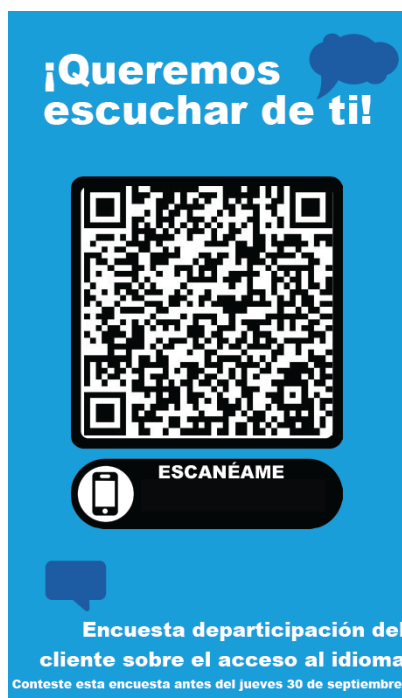
Translation of Vital Documents

Agencies receiving federal funding are required to identify "vital documents" that must be translated to the extent possible. Vital documents are defined as 1) any document critical for obtaining services and benefits, and/or 2) any document required by law. In other words, whether or not a document (or the information it solicits) is "vital" depends on the importance of the program, information, encounter or service involved, and the consequence to the LEP person if the information in question is not accurate or timely disseminated. For instance, applications for a bicycle safety course would not generally be considered vital, although summaries of major service changes are vital documents. Other vital documents include but are not limited to:

- Title VI public notice

- Title VI complaint procedures

- Bus and rail schedules

- Summaries and notices of public hearings regarding proposed:

  - Transportation plans

  - Service impacting construction activities

  - Major service changes

- o Fare changes

- Emergency transportation information

RTD has consistently worked with community organizations and the LEP populations the serve to evaluate which documents are "vital" to the meaningful access to RTD services and programs. However, with the 2022-2025 Language Access Plan update, the LAP inter-departmental workgroup now has clearly defined tiers (1,2 and 3) to determine if documents are considered vital and to guide translation efforts. Find more information in *2022-2025 Language Access Plan Guidelines and Implementation Calendar*.

2022-2025 Language Access Plan Guidelines and Implementation Calendar

After a review of the 2021 Four Factor Analysis results, the LAP inter-departmental workgroup recommended a two-tiered approach to meeting the needs of LEP populations in RTD's service area. *Tier One* retains successful programs and activities designed to meet the language needs of LEP populations. *Tier Two* outlines areas of focus to expand upon the agency's goal of providing LEP customers with meaningful access to RTD programs and services.

Tier 1: LEP Activities

Tier One retains existing programs and activities designed to meet the language needs of regional LEP populations, such as telephone interpreters in virtually any language, multi-lingual printed materials and multi-lingual information on the RTD website or brochures, and continuing development of partnerships with community organizations that serve people with limited English proficiency.

Specifically, the following activities will continue (as noted in Language Assistance Measures Employed by RTD above):

- Providing telephone interpreters via customer service at 303-299-6000 and via the Access-a-Ride Call Center at 303-292-6560 to assist LEP customers

- Providing bilingual customer information specialists to assist Spanish-speaking customers

- Providing RTD basic customer information in 10 safe harbor languages on RTD website

- Ability to translate RTD website into 13 safe harbor languages plus 2 additional languages

- Spanish-language interface for Ticket Vending Machine (TVM) transactions

- Establishing and nourishing partnerships with community organizations that serve LEP populations

- Civil Rights complaint procedures and complaint forms in all safe harbor languages on RTD website

- Civil Rights public notice in all RTD vehicles and transit centers in top three languages

- Provide information for the LIVE low-income fare program in Spanish language on https://www.rtd-denver.com/LiVE

- Utilization of ethnic media sources (Telemundo Denver, Univision, El Semanrio, La Voz, El Hispano, El Comercio, Latin Life Denver, Asian Avenue Magazine, Colorado Chinese News, Gorizont and Thoi Bao to disseminate information

- Posting English and Spanish service changes, translating presentations and other information on the website

Tier 2: Activities to Deepen Our Focus

Tier Two identified new areas to deepen our focus to further the agency's goal of providing LEP customers with meaningful access to RTD programs and services, ensuring continuity of our efforts and deepening our understanding of our commitment and responsibility. For each of the four areas of focus and activities noted in the Guidelines Index below, RTD will collaboratively build out a charter that provides the purpose, practice, responsibility, approach and procedure.

LAP Guidelines Index

#	Guideline	Purpose
1	**Updating & Monitoring the LAP**	**How RTD monitors, evaluates and updates the LAP**
1A	**LAP Monitoring & Compliance**	To ensure compliance and monitor the effectiveness of RTD's Language Access Plan on an ongoing basis.
1B	**LEP Research & Administration**	To ensure Four Factor Analysis is continuously updated with data and information.
1C	**Primary Research**	To obtain feedback from Spanish-speaking persons on how to improve RTD's LAP and language accessibility efforts.
1D	**Secondary Research**	To obtain feedback from other language groups that meet the "safe harbor" threshold on how to improve RTD's LAP and language accessibility efforts.
2	**Language Assistance**	**How RTD provides language assistance services by language**

#	Guideline	Purpose
2A	**Use of In-person Interpreter Services at Public Meetings**	To provide, at no cost, in-person interpreter services upon request for public meetings, and important events.
2B	**Written Translation of Vital Documents**	To implement a procedure to provide for written translation of vital documents.
2C	**Customer Information Channels**	To provide information about RTD services in multiple languages using the Four Factor Analysis to determine need.
2D	**Culturally Responsive Outreach**	To develop and implement culturally competent outreach to increase awareness of and access to RTD services and programs.
3	**Providing Notice of Language Assistance**	**How RTD provides notice to LEP persons about the availability of language assistance**
3A	**Notice of Right to Language Assistance, Outreach Document**	To provide notice of right to language assistance, at no cost, on non-vital yet important outreach documents. Examples may include project fact sheets, service planning open house notices, and other open house materials.
3B	**Notice of Right to Language Assistance on the System**	To identify areas where RTD can provide notice of "right to language assistance," at no cost, to LEP persons. Examples include Title VI public notice.
3C	**Notice of Civil Rights Complaint Procedures**	To provide information in multiple languages about RTD's complaint procedure.
4	**Training Programs for Personnel**	**How RTD trains employees to provide timely and reasonable language assistance to LEP populations**
4A	**Curriculum Development**	To ensure that RTD employees know their obligations to provide meaningful access to information and services for LEP persons.
4B	**Incorporate LAP Information into Employee Environment**	To establish a procedure to incorporate LAP Plan information into the employee environment. Examples include a resource guide and web content on The Hub.

Area of Focus 1: Updating and Monitoring the LAP

2022 Language Access Plan

This area of focus shores up RTD's LAP updating and monitoring process by developing the necessary systems to more efficiently and effectively determine language assistance needs. In addition to ensuring compliance with Title VI and DOT LEP Guidance, this area will see RTD building out processes (e.g., staff roles, community evaluation tool and more) to guarantee that language assistance is available where needed, establishing and solidifying relationships with organizations and community members to inform the LAP, creating a uniform file management system for language assistance needs and translated documents, and otherwise formalizing a strategic foundation for pursuing language access.

Area of Focus 2: Language Assistance

Where Area of Focus 1 focuses on how RTD monitors, evaluates and updates its language access program itself, Area of Focus 2 dials in on the actual provision of language assistance. For instance, activities will include creating a planning process for hosting an in-person interpreter at events, ensuring certain information like trip planning or purchasing fares is language-accessible, providing interpretation for basic transit questions, creating updated versions of How to Ride videos in identified languages and more.

Specifically, as mentioned in *Language Assistance Measures Employed by RTD*, RTD will be fortifying its processes for translating vital documents. In identifying documents needed to provide meaningful access to RTD services for LEP customers, RTD has defined three levels of vital documents. This will allow for prioritization of materials translation as resources allow. In some cases, translation of vital documents may consist of only a summary or key points. For other vital documents, providing notice of available language assistance can also provide sufficient access.

The 3 tiers can be described as follows:

1. **Tier 1 – Safety, Security and Civil Rights**. Information categorized in Tier 1 is that which protects customers' physical safety and facilitates RTD customers to exercise their legal rights. Providing translation or LEP-accessible versions of this type of information is the highest priority of all vital documents. Information categorized as Tier 1 would be found within (but would not be all-inclusive of) the following information types identified in Factor 3: Safety and Security, and Rights Notices. Information about public hearings and public involvement opportunities related to Fare Information, Service Changes and Planning Information are also classified as Tier 1 vital documents. Customer surveys related to Tier 1 will be considered Tier 1 documents.

2. **Tier 2 – Information Critical to Access RTD's Services**. Tier 2 includes information that helps LEP customers to understand RTD services to facilitate ease of use and to understand RTD programs to facilitate participation. These types of information are critical for LEP-access because they provide more details about specific benefits available or details of RTD services or programs. Information categorized as Tier 2 would be found within (but would not be all-inclusive of) the following information types identified in Factor 3: basic customer information, fare payment information, program applications, maps, service changes, service alerts, and destination information. Customer surveys related to Tier 2 will be considered Tier 2 documents.

3. **Tier 3 – Information to Empower Customers**. This tier of information encompasses materials that help

LEP customers to understand and participate with RTD at higher level. This includes information that can empower customers to play a larger role in contributing to long-term service decisions or use RTD for recreational activities. Information categorized as Tier 3 would be found within (but would not be all-inclusive of) the following information types identified in Factor 3: Project Updates, Planning Information and Destination Information. Customer surveys related to Tier 3 information will be considered Tier 3 documents.

Figure 43. A Summary of the 3 Tiers to Guide Vital Document Translation

Tier	Information Type
Tier 1 – Safety, Security and Civil Rights: Information that protects customers' physical safety and informs RTD customers of their legal rights.	- Safety and Security information - Rights Notices - Information about Public Hearings and Comment Opportunities related to: - Fare Changes - Service Changes - Planning Information
Tier 2 – Information Critical to Access: Information that helps LEP customers to understand RTD service to facilitate ease of use and to understand RTD's programs to facilitate participation.	- Basic Customer Information - Fare Payment Information - Programs (Access-A-Ride, Special Discount Programs) - Maps - Service Changes - Service Alerts - Destination Information
Tier 3 – Information to Empower Customers: Information and materials that help LEP customers to understand and participate with RTD at higher level.	- Project Updates - Planning Information

Figure 44 summarizes the languages most spoken in the RTD service district, which can be grouped into three tiers. The tiers indicate the relative need for translation or interpretation services district-wide and reflect each language's rank based on the average of all four data sources described in Factor 1.

Figure 44. RTD's 3 Language Tiers

Tier 1 Language Group	Tier 2 Language Groups	Tier 3 Language Groups
Spanish	Vietnamese	Amharic
	Chinese (Simplified)	Korean
		Russian
		Nepali
		Arabic
		Khmer (Cambodian)
		French
		Japanese
		Farsi (Persian)
		Tagalog
		Swahili
		Hindi
		German
		Somali
		Laotian
		Hmong
		Thai
		Telugu

RTD will also consistently work with community organizations and the LEP populations the serve to evaluate which documents are "vital" to the meaningful access to RTD services and programs.

Area of Focus 3: Providing Notice of Language Assistance

Area of Focus 3 is predominantly about how RTD communicates to people limited in English about their options to receive language assistance, as advertising the availability of language assistance services will be key to ensuring people with limited English proficiency are able to meaningfully access RTD services. RTD will strategize how to best notify LEP communities of available language assistance by strategically posting signage at all major passenger transfer stations, RTD's administrative offices and other RTD properties with high volumes of pedestrian traffic. The agency is also considering how to make a dedicated "brand" or cohesive theme around the language assistance services it offers to make them more identifiable and uniform. Furthermore, RTD will utilize its website and the relationships developed with community organizations that predominantly serve people limited in English to better market available language assistance services.

Area of Focus 4: Training Programs for Personnel

LEP DOT Guidance states that RTD employees should know their obligations to provide meaningful access to information and services for LEP persons, and all employees in public contact positions should be properly trained. In 2022-2025, and in accordance with Guideline 4, RTD intends to fortify staff training to ensure that:

- Staff know about LEP policies, procedures and resources; and

- Public-facing staff are trained to work effectively with in-person and telephone interpreters.

As noted in the Four Factor Analysis, RTD mainly encounters LEP persons by way of its local bus service. In 2022, RTD's Transit Equity Office will launch "Serving Limited English Proficiency Customers" training courses to educate and provide general skills to all frontline staff for interacting with LEP customers.

It's reasonable to anticipate that more complex interaction with people limited in English will occur with telephone information specialists, receptionists, sales outlets associates, transit security and other frontline staff. These frontline employees will have more detailed procedures and sophisticated tools for managing interactions with LEP persons to include, but not limited to:

- Third-party telephone or video remote interpreters

- "Basic Spanish for Transit" employee books

- RTD LEP handout guide

- U.S. Census "I Speak" cards

- Written translations of vital and frequently requested documents

- Notice of interpretative services handout

To support implementation of the 2022-2025 LAP, RTD will develop charters for each of the four areas of focus during calendar year 2022. In turn, language access activities will become increasingly precise, actionable and measurable.

Implementation Calendar

In consideration of implementation factors, including available resources and costs, the LAP utilizes a staggered implementation schedule over several years. The following calendar illustrates LAP activities, tasks and implementation years.

LAP Implementation Calendar		Target Completion (CY=Calendar Year)			
Task		CY '22	CY '23	CY '24	CY '25
1	**Updating and Monitoring the LAP**				
a	Complete Four Factor Analysis.	X			X
b	Finalize LAP Guidelines Index and Implementation Schedule.	X			
c	Build out LAP Program Team and staff roles.	X			
d	Hire dedicated staff to implement and oversee day-to-day administration of LAP program, ensuring compliance and correct implementation.	X			
e	Build out process for ensuring language assistance and/or translated information is provided when necessary and resources are available.	X			
f	Determine which RTD documents meet the definition of "vital documents" and monitor for new documents that may be considered "vital."	X			
g	Develop community evaluation survey tool as part of RTD Strategic Plan to gather feedback from LEP communities, including customers and	X			

2022 Language Access Plan

LAP Implementation Calendar		Target Completion (CY=Calendar Year)			
	community organizations, about the effectiveness of RTD's LAP.				
h	Conduct LEP primary and secondary research to engage LEP communities in identifying vital information/documents and ensuring that it is communicated in language.		X		
i	Create a LAP Advisory Committee that contains community members who can inform our efforts to engage and support LEP riders.		X		
j	Build out a network of trusted individuals that can help review translated materials.		X		
k	Create file repository and track translated documents.	X	X	X	X
l	Conduct annual LAP monitoring reviews.		X	X	X
2	**Language Assistance**				
a	Determine process for use of in-person interpreter services upon request for public meetings and important events.	X			
b	Provide telephone interpretation for basic transit questions.		X		
c	Ensure trip planning and fare payment assistance in any language virtually (website) or telephonically.		X		
d	Create a standard LEP Handbill for use by outreach staff when providing notice of language assistance.		X		
e	Translate vital documents into top 3 languages (of 21 language options).		X	X	

2022 Language Access Plan

LAP Implementation Calendar		Target Completion (CY=Calendar Year)			
f	Develop process for community partners/customers to order translated vital documents.		X		
g	Clarify/formalize process for working with contracted interpreters and translators.	X			
h	Clarify/formalize proof reading and quality control for translations.		X		
i	Develop a process for staff to understand the steps when determining which languages should be served when translating for a project, program or activity.	X			
j	Update the Marketing Request form with the following question: Does your project require language translations?		X		
k	Create updated versions of How to Ride videos in identified languages.		X	X	
l	Identify methods to provide notice of language assistance using customer information channels.		X		
m	Develop/review contract language to ensure all partners (sub-recipients/contractors) providing goods and services for RTD are in compliance with Title VI regulations pertaining to language assistance procedures.	X	X		
n	Develop and implement culturally competent outreach to increase awareness and access to services.		X	X	
3	**Providing Notice of Language Assistance**				
a	Update process and tools for providing notice of	X			

LAP Implementation Calendar		Target Completion (CY=Calendar Year)			
	right to language assistance, at no cost.				
b	Develop and launch Language Assistance brand.		X		
c	Update the Notice of Civil Rights Complaint Process postings.	X			
d	Build out notice of meetings and events for different Customer Information Channels.	X	X		
e	Determine process of when to utilize ethnic media sources to communicate RTD activities.	X	X		
f	Identify a way to provide notice of language assistance when using mass emails and social media.		X		
4	**Training Programs for Personnel**				
a	All customer-facing staff will be trained on how to use telephone interpretation.	X	X		
b	Establish webpage on the Hub for LEP resources that can be utilized by RTD staff.	X	X		
c	All relevant staff will be trained in process for requesting translation and interpretation services.		X		
d	Incorporate LEP resources into onboarding and orientation process for relevant staff.		X		
e	Develop curriculum and LAP training for staff based off of needs assessment. Training will be specific to different department staff and covers the resources available and how to use them.		X		
f	Develop system-wide tools to support staff on language assistance measures.			X	

RTD looks forward to implementing the 2022-2025 Language Access Plan by first producing the strategic and procedural foundation for expanding language access (Area of Focus 1) as well as immediately working to increase awareness of the language assistance measures the agency already provides (Area of Focus 3). Fortunately, the agency has already created a solid base from which to pursue this plan by establishing its LAP outreach program, hiring on the Transit Equity Specialist to coordinate LAP-related work, finalizing the Implementation Calendar and Guidelines Index as included above, and more. An immediate next step will be to write the charters that guide each of RTD's language assistance activities in their purpose, practice, responsibility, approach and procedure. From there, RTD looks forward to taking real action on improving language access across the agency's public transportation system, in turn making local transit more accessible and equitable for residents, customers and visitors alike.

Exhibit A

See the following Factor 1-4 Analyses.

Factor 1: Number or Proportion of LEP Persons within RTD Service District

Prepared by RTD Market Research | April 2021
Updated by RTD Transit Equity Office | February 2022

Four Factor Analysis: Factor 1

Table of Contents

Four Factor Analysis: Factor 1

Background

In accordance with Title VI and the Federal Transit Administration's (FTA) policy guidance, transit agencies are required to establish, monitor and update their Language Access Plan (LAP) to mitigate language barriers that could prevent Limited English Proficient (LEP) persons from accessing agency programs and services.[1] The LAP is developed utilizing the U.S. Department of Transportation's (USDOT) LEP Guidance Handbook. The USDOT provides guidance to transit agencies receiving federal funding based upon the determination of need, using a Four Factor Analysis. This Analysis includes these criteria:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by an RTD program, activity or service.
2. The frequency with which LEP persons interact with RTD programs, activities or services.
3. The nature and importance of programs, activities or services provided by RTD to the LEP population.
4. The resources available to RTD and overall cost to provide language assistance.

Effective February 2021, the LAP research workgroup, made up of Transit Equity and Market Research staff, convened to initiate the update of RTD's Four Factor Analysis. To complete Factor 1, the LAP research workgroup analyzed data from the United States Census, state agencies, and other resources.

American Community Survey (ACS)

The American Community Survey estimates give RTD a reliable baseline of the safe harbor languages within the RTD district boundaries.[2] RTD will supplement these data with Public Use Microdata Sample, Colorado Department of Education and Colorado Health Authority data to ascertain if there are other potential language groups that meet the safe harbor threshold.

Figure 1. Languages Spoken by LEP Persons Age 5 and Older in RTD District from ACS

Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	155,241	4.8%	68.4%
Other Asian/Pacific Island Languages	11,187	0.3%	4.9%
Other Indo-European Languages (incl. Albanian, Lithuanian, Pashto, Romanian, Swedish)	10,191	0.3%	4.5%
Vietnamese	10,061	0.3%	4.4%
Chinese (incl. Mandarin, Cantonese)	9,612	0.3%	4.2%
Russian, Polish or Other Slavic Languages	7,005	0.2%	3.1%
Korean	4,917	0.2%	2.2%
Arabic	3,094	0.1%	1.4%
French, Haitian or Cajun	3,063	0.1%	1.3%
Tagalog (incl. Filipino)	1,466	0.0%	0.6%
German or Other West Germanic Languages	1,401	0.0%	0.6%

Source: U.S. Census American Community Survey Tables: 2015-2019 (5-Year Estimates)

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[1] To view policy guidance, please see *Regulatory Background* in the Appendix.

[2] RTD estimated district boundaries using the American Community Survey (ACS) 5-Year Estimates at the Census Tract level. RTD analyzed all Census Tracts required to include all 8 counties RTD has services in: Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson and Weld Counties.

Figure 2. Languages with LEP Populations ≥ 1,000
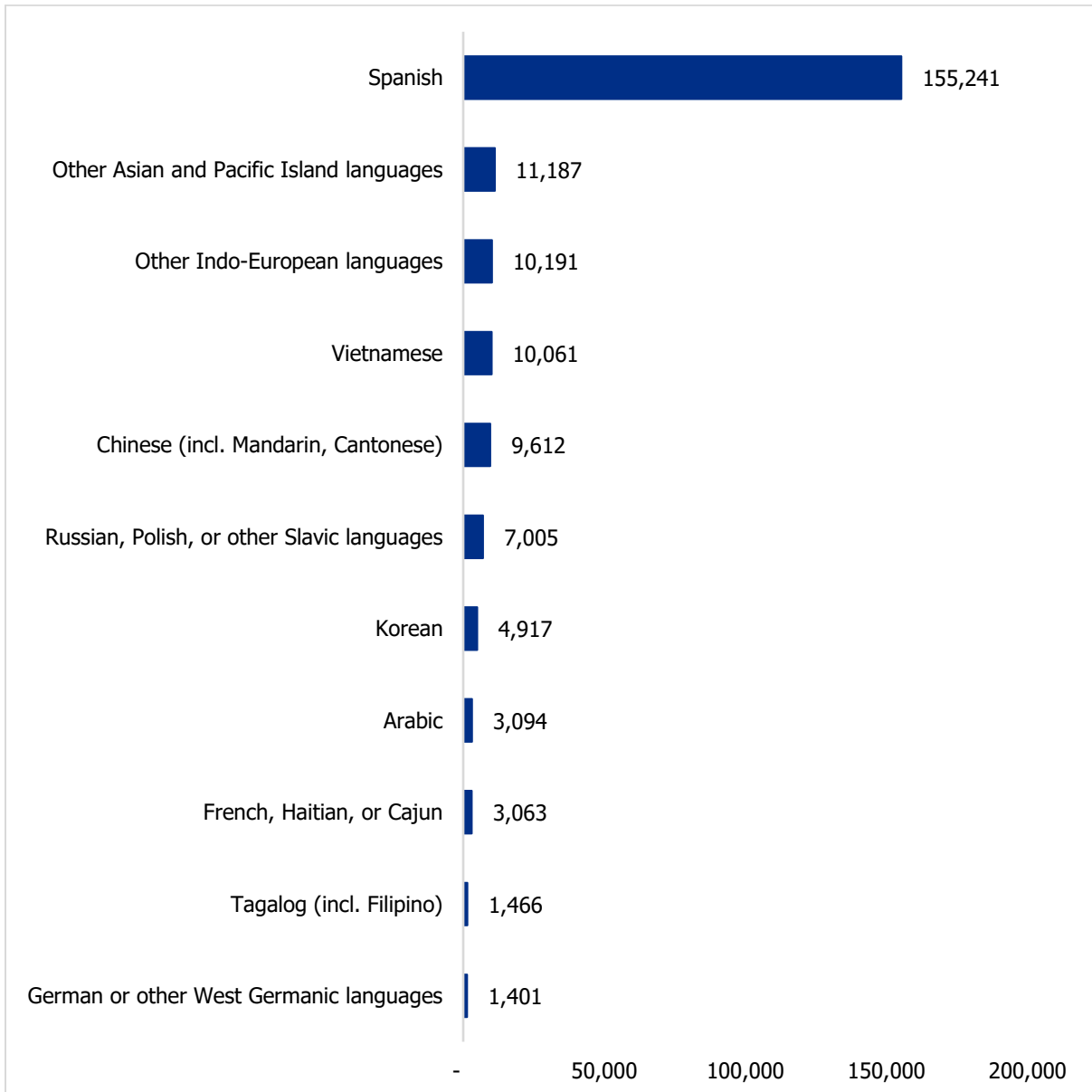
Language	LEP Population
Spanish	155,241
Other Asian and Pacific Island languages	11,187
Other Indo-European languages	10,191
Vietnamese	10,061
Chinese (incl. Mandarin, Cantonese)	9,612
Russian, Polish, or other Slavic languages	7,005
Korean	4,917
Arabic	3,094
French, Haitian, or Cajun	3,063
Tagalog (incl. Filipino)	1,466
German or other West Germanic languages	1,401

Source: U.S. Census American Community Survey Tables: 2015-2019 (5-Year Estimates)
C16001 (Tracts) – Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

Public Use Microdata Sample (PUMS)

The Public Use Microdata Sample (PUMS) estimates supplement the ACS estimates to ascertain if there are other potential language groups within the RTD district boundaries.[3] Additionally, the PUMS estimates will allow RTD to take a deeper dive of the specific categories such as the categories under African languages (e.g., Somali, Amharic) and Other Asian languages (e.g., Khmer, Laotian).

Figure 3. Languages Spoken by LEP Persons Age 5 and Older in RTD District from PUMS

Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	161,436	4.8%	68.9%
Vietnamese	10,067	0.3%	4.3%
Chinese (incl. Mandarin, Cantonese)	9,724	0.3%	4.1%
Amharic, Somali, or other Afro-Asiatic languages	6,351	0.2%	2.7%
Korean	4,917	0.1%	2.1%
Russian	4,913	0.1%	2.1%
Nepali, Marathi, or other Indic languages	3,157	0.1%	1.3%
Arabic	3,108	0.1%	1.3%
Other languages of Asia (incl. Khmer, Hmong)	3,046	0.1%	1.3%
French (incl. Cajun)	2,684	0.1%	1.1%
Thai, Lao, or other Tai-Kadai languages	1,806	0.1%	0.8%
Persian (incl. Farsi, Dari)	1,637	0.0%	0.7%
Tagalog (incl. Filipino)	1,493	0.0%	0.6%
Japanese	1,464	0.0%	0.6%
Hindi	1,427	0.0%	0.6%
Swahili	1,372	0.0%	0.6%
Other Indo-European languages (incl. Albanian, Lithuanian)	1,286	0.0%	0.5%
German	1,282	0.0%	0.5%
Yoruba, Twi, Igbo, or other languages of Western Africa	1,273	0.0%	0.5%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	1,142	0.0%	0.5%
Telugu	995	0.0%	0.4%

Source: U.S. Census Public Use Microdata Sample Tables: 2015-2019 (5-Year Estimates)

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[3] RTD estimated district boundaries using Public Use Microdata Areas (PUMAs). RTD analyzed all PUMAs required to include all 8 counties RTD has services in: Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson and Weld Counties. To include all 8 counties using PUMAs, RTD included 26 unique PUMAs. The 26 PUMAs included all 8 counties serviced by RTD in addition to part of 13 other counties. The addition of these counties increases the estimated population of the district from 3.2 million to 3.6 million. More specific geographic regions are not available for PUMS data.

Four Factor Analysis: Factor 1

Figure 4. Languages with LEP Populations ≥ 1,000
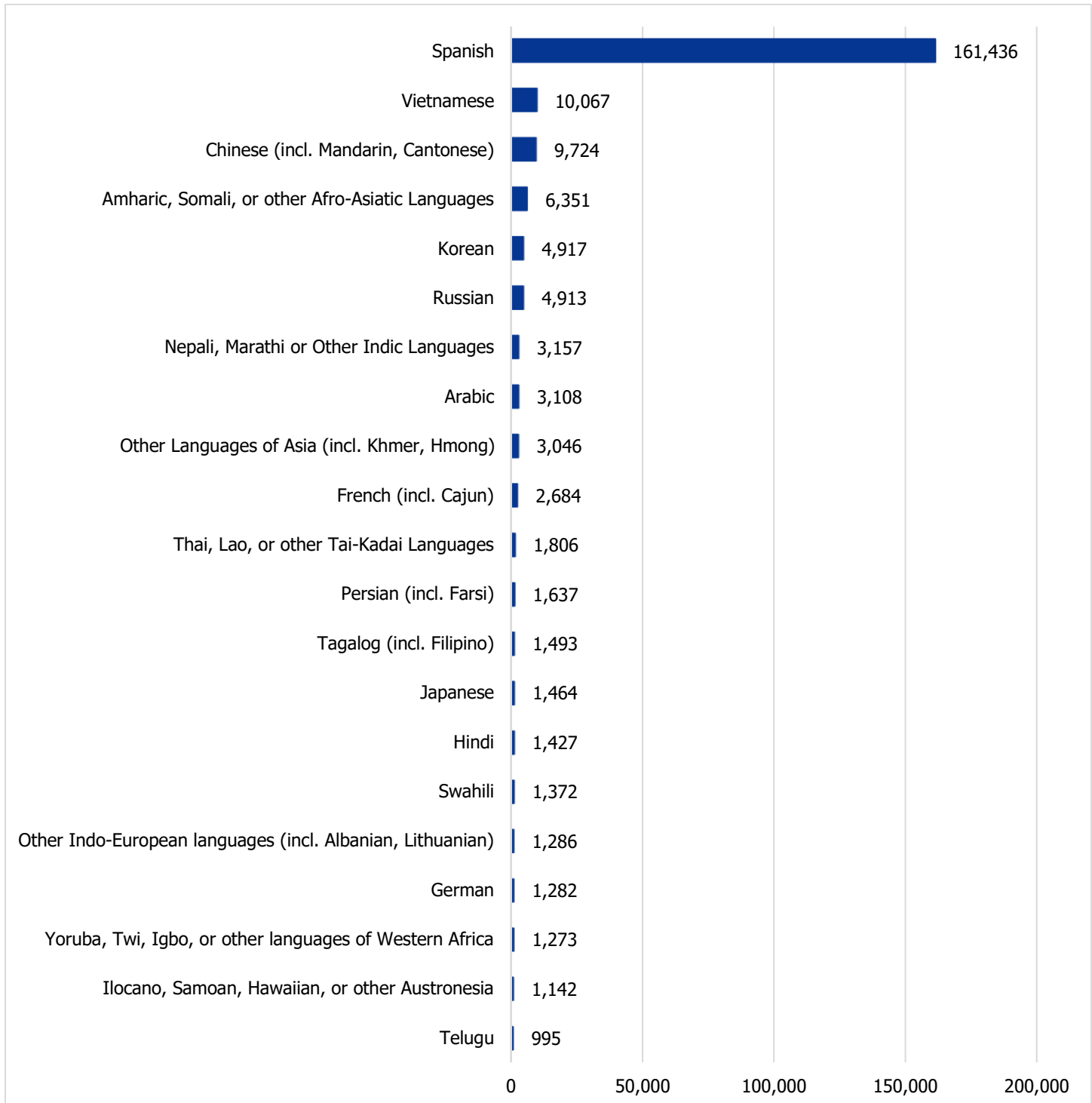
Language	Population
Spanish	161,436
Vietnamese	10,067
Chinese (incl. Mandarin, Cantonese)	9,724
Amharic, Somali, or other Afro-Asiatic Languages	6,351
Korean	4,917
Russian	4,913
Nepali, Marathi or Other Indic Languages	3,157
Arabic	3,108
Other Languages of Asia (incl. Khmer, Hmong)	3,046
French (incl. Cajun)	2,684
Thai, Lao, or other Tai-Kadai Languages	1,806
Persian (incl. Farsi)	1,637
Tagalog (incl. Filipino)	1,493
Japanese	1,464
Hindi	1,427
Swahili	1,372
Other Indo-European languages (incl. Albanian, Lithuanian)	1,286
German	1,282
Yoruba, Twi, Igbo, or other languages of Western Africa	1,273
Ilocano, Samoan, Hawaiian, or other Austronesia	1,142
Telugu	995

*Source: U.S. Census Public Use Microdata Sample Tables: 2015-2019 (5-Year Estimates).
B16001 (PUMS) – Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over*

Colorado Department of Education (CDE)

In addition to considering the ACS and PUMS estimates, the Factor 1 analysis considered the most recent data on the Student Language Spoken at Home from the CDE for the 2020-2021 school year. These data include statistics on the language spoken at home by students ranging from kindergarten to high school. It is assumed that if children are identified as speaking a language other than English at home, then their parents or adult guardians are likely to speak the same language. While this data set does not identify the number of people above the school age that speak a language other than English, it can be a helpful complement to Census data.

Data were compiled from the following school districts serving students within the RTD district boundaries.[4] Below is the full list of school districts included in the analysis.

Figure 5. School Districts Included in Analysis

School Districts Included in Analysis			
Adams 12 Five Star Schools	Cherry Creek 5	Englewood 1	Mapleton 1
Adams County 14	Clear Creek RE-1	Expeditionary BOCES	School District 27J
Adams-Arapahoe 28J	Denver County 1	Gilpin County RE-1	Sheridan 2
Boulder Valley Re 2	Douglas County Re 1	Jefferson County R-1	St Vrain Valley RE1J
Byers 32J	Education reEnvisioned BOCES	Julesburg Re-1	Weld County School District RE-3J
Charter School Institute	Elizabeth School District	Littleton 6	Westminster Public Schools

Figure 6. Languages Spoken at Home for School Districts within RTD Service District 2020-2021

Language	Number of Students[5]	Percent of Students[6]
Spanish	96,008	77.0%
Vietnamese	3,123	2.5%
Arabic	3,001	2.4%
Chinese	2,475	2.0%
Russian	2,214	1.8%
Amharic	2,083	1.7%
Nepali	1,225	1.0%
Korean	1,147	0.9%
French	1,021	0.8%

Source: Colorado Department of Education: Languages Spoken at Home

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[4] RTD included school districts that have a minimum of 1 individual school with a zip code within RTD's service area.

[5] RTD included all students who speak a language other than English at home in the analysis. This includes students who classify as English Language Learners (ELL) and students whose primary language is something other than English but spoke English fluently upon entering school.

[6] The CDE redacts data where there are less than 16 foreign language speakers in a school district. RTD utilized data that were not anonymized, therefore the percentages listed are estimates and should not be used to determine safe harbor languages.

Colorado Health Authority

Data were compiled from participating Colorado Women, Infants and Children (WIC) clinics in Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson and Weld Counties. The date range was from January 1, 2019 to January 1, 2020. In total, there were 12 distinct languages spoken by clients frequenting the clinics. Table 5 shows a frequency count of unique clients by spoken language.

Figure 7. Spoken Languages of WIC Clients within the RTD Service Area For 2019[7]

Language	Number of WIC Clients	Percent of Clients[8]
Spanish	8,550	73.2%
Unknown	918	7.9%
Other	836	7.2%
Arabic	339	2.9%
Amharic	282	2.4%
Somali	222	1.9%
French	191	1.6%
Nepali	113	1.0%
Tigrinya	63	0.5%
Vietnamese	60	0.5%
Burmese	57	0.5%
Swahili	57	0.5%

Source: Colorado Women, Infants and Children Clinic: Language Spoken (2019)

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[7] Colorado Department of Public Health and Environment does not disclose the exact number of clients where a language spoken at home is less than 50 per county in order to protect privacy.

[8] RTD utilized data that were not anonymized, therefore the percentages listed are estimates and should not be used to determine safe harbor languages.

All Limited English Proficient Population Distribution

All LEP Population Percentage by Census Tract
- 0%
- <3%
- 3%-9.9%
- 10%-19.9%
- 20%-29.9%
- >30%

RTD Service
- - - Peak Only Frequent Bus
— All Day Frequent Bus
— All Other Bus
— RTD Rail
⌐_⌐ RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Spanish-Speaking Population Distribution

Spanish-Speaking LEP Population Percentage by Census Tract

- 0%
- <3%
- 3%-9.9%
- 10%-19.9%
- 20%-29.9%
- >30%

RTD Service
- Peak Only Frequent Bus
- All Day Frequent Bus
- All Other Bus
- RTD Rail
- RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Arabic-Speaking Population Distribution

Limited English Proficient Chinese-Speaking Population Distribution

Chinese-Speaking LEP Population Percentage by Census Tract

- 0%
- 0.1%-2.5%
- 2.6%-5%
- 5.1%-7.5%

RTD Service
- - - Peak Only Frequent Bus
—— All Day Frequent Bus
—— All Other Bus
—— RTD Rail
- - - RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient French-Speaking Population Distribution

French-Speaking LEP Population Percentage by Census Tract

- 0%
- 0.1%-2.5%
- 2.6%-5%

RTD Service

- Peak Only Frequent Bus
- All Day Frequent Bus
- All Other Bus
- RTD Rail
- RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Four Factor Analysis: Factor 1

Limited English Proficient Vietnamese-Speaking Population Distribution

Vietnamese-Speaking LEP Population Percentage by Census Tract
- 0%
- 0.1%-2.5%
- 2.6%-5%
- 5.1%-7.5%

RTD Service
- Peak Only Frequent Bus
- All Day Frequent Bus
- All Other Bus
- RTD Rail
- RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Four Factor Analysis: Factor 1

Limited English Proficient Russian-Speaking Population Distribution

Russian-Speaking LEP Population Percentage by Census Tract

- 0%
- 0.1%-2.5%
- 2.6%-5%
- 5.1%-7.5%

RTD Service
- - - - Peak Only Frequent Bus
- ——— All Day Frequent Bus
- ——— All Other Bus
- ——— RTD Rail
- ⌐ ¬ RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Tagalog-Speaking Population Distribution

N

Tagalog-Speaking LEP
Population Percentage
by Census Tract

0%
0.1%-1.5%
1.6%-2.5%

RTD Service

- - - Peak Only Frequent Bus

——— All Day Frequent Bus

——— All Other Bus

——— RTD Rail

RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Miles
0   5   10

Limited English Proficient Other Indo European-Speaking Population Distribution

Limited English Proficient Other Asian and Pacific-Speaking Population Distribution

Other Asian and Pacific-Speaking LEP Population Percentage by Census Tract

- 0%
- 0.1%-2.5%
- 2.6%-5%
- 5.1%-7.5%
- 7.6%-10%

RTD Service
- Peak Only Frequent Bus
- All Day Frequent Bus
- All Other Bus
- RTD Rail
- RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Korean-Speaking Population Distribution

N

Korean-Speaking LEP Population Percentage by Census Tract

- 0%
- 0.1%-2.5%
- 2.6%-5%

RTD Service

- - - Peak Only Frequent Bus
— All Day Frequent Bus
— All Other Bus
— RTD Rail
- - RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Miles
0   5   10

Limited English Proficient German-Speaking Population Distribution

German-Speaking LEP Population Percentage by Census Tract

- 0%
- 0.01%-0.75%
- 0.76%-1.5%

RTD Service
- – – Peak Only Frequent Bus
- —— All Day Frequent Bus
- —— All Other Bus
- —— RTD Rail
- RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Appendix B: LEP PUMS Maps

Limited English Proficient Afro-Asiatic-Speaking Population Distribution

Limited English Proficient Arabic-Speaking Population Distribution

Arabic-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

- Less than .01%
- .01% or Greater

RTD Service
- – – Peak Only Frequent Bus
- —— All Day Frequent Bus
- —— All Other Bus
- —— RTD Rail
- ⌐ ⌐ RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Chinese (incl. Mandarin, Cantonese)-Speaking Population Distribution

Chinese (incl. Mandarin, Cantonese)-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .03%
.03% or Greater

RTD Service
- - Peak Only Frequent Bus
— All Day Frequent Bus
— All Other Bus
— RTD Rail
RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient French (incl. Cajun)-Speaking Population Distribution

French (incl. Cajun)-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .01%

.01% or Greater

RTD Service

- - Peak Only Frequent Bus

— All Day Frequent Bus

All Other Bus

— RTD Rail

RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient German-Speaking Population Distribution

German-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .04%
.04% or Greater

RTD Service
- - Peak Only Frequent Bus
— All Day Frequent Bus
— All Other Bus
— RTD Rail
▭ RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Hindi-Speaking Population Distribution

N

Hindi-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .04%
.04% or Greater

RTD Service
- - Peak Only Frequent Bus
—— All Day Frequent Bus
—— All Other Bus
—— RTD Rail
□ RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Longmont
Gunbarrel
Erie
Boulder
Lafayette
Todd Creek
Brighton
Louisville
Superior
Thornton
Broomfield
Northglenn
Westminster
Federal Heights
Commerce City
Shaw Heights
Welby
Sherrelwood
Arvada
Twin Lakes
Derby
Fairmount
Berkley
Golden
Wheat Ridge
Applewood
Edgewater
West Pleasant View
Denver
Aurora
Lakewood
Glendale
Englewood
Sheridan
Evergreen
Cherry Hills Village
Greenwood Village
Dakota Ridge
Cherry Creek
Centennial
Dove Valley
Littleton
Ken Caryl
Highlands Ranch
Stonegate
Lone Tree
Parker
Castle Pines
The Pinery
Castle Rock

Miles
0   5   10

Limited English Proficient Austronesian Languages-Speaking Population Distribution

N

Austronesian Languages-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .03%

.03% or Greater

RTD Service

- - - Peak Only Frequent Bus

——— All Day Frequent Bus

——— All Other Bus

——— RTD Rail

RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Miles
0   5   10

Four Factor Analysis: Factor 1

Limited English Proficient Indic Languages (incl. Nepali, Marathi)-Speaking Population Distribution

Indic Languages (incl. Nepali, Marathi)-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

- Less than 0.1%
- 0.1% or Greater

RTD Service
- Peak Only Frequent Bus
- All Day Frequent Bus
- All Other Bus
- RTD Rail
- RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Japanese-Speaking Population Distribution

Japanese-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .04%
.04% or Greater

RTD Service
- - Peak Only Frequent Bus
— All Day Frequent Bus
— All Other Bus
— RTD Rail
RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Korean-Speaking Population Distribution

Korean-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .01%

.01% or Greater

RTD Service

– – Peak Only Frequent Bus

—— All Day Frequent Bus

—— All Other Bus

—— RTD Rail

RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Four Factor Analysis: Factor 1

Limited English Proficient Other Languages of Asia-Speaking Population Distribution

N

Other Languages of Asia-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than 0.1%

0.1% or Greater

RTD Service

- - - Peak Only Frequent Bus

—— All Day Frequent Bus

—— All Other Bus

—— RTD Rail

⌐ ⌐ RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

rtd-denver.com

Limited English Proficient Persian (Farsi)-Speaking Population Distribution

Persian (incl. Farsi)-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .05%
.05% or Greater

RTD Service
- - Peak Only Frequent Bus
— All Day Frequent Bus
— All Other Bus
— RTD Rail
RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Russian-Speaking Population Distribution

Russian-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

- Less than .01%
- .01% or Greater

RTD Service
- Peak Only Frequent Bus
- All Day Frequent Bus
- All Other Bus
- RTD Rail
- RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Four Factor Analysis: Factor 1

Limited English Proficient Spanish-Speaking Population Distribution

Spanish-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

- Less than 4.7%
- 4.7% or Greater

RTD Service
- Peak Only Frequent Bus
- All Day Frequent Bus
- All Other Bus
- RTD Rail
- RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Swahili-Speaking Population Distribution

Limited English Proficient Tagalog (incl. Filipino)-Speaking Population Distribution

Tagalog (incl. Filipino)-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .04%
.04% or Greater

RTD Service
- - Peak Only Frequent Bus
— All Day Frequent Bus
— All Other Bus
— RTD Rail
RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Tai-Kadai (incl. Thai, Lao)-Speaking Population Distribution

N

Tai-Kadai (incl. Thai, Lao)-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .01%

.01% or Greater

RTD Service

– – Peak Only Frequent Bus

— All Day Frequent Bus

— All Other Bus

— RTD Rail

☐ RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Longmont

Gunbarrel

Boulder

Erie

Lafayette

Todd Creek

Brighton

Louisville

Superior

Broomfield

Thornton

Northglenn

Westminster

Federal Heights

Commerce City

Shaw Heights

Welby

Sherrelwood

Arvada

Twin Lakes

Derby

Fairmount

Berkley

Golden

Wheat Ridge

Applewood

Edgewater

West Pleasant View

Denver

Aurora

Glendale

Lakewood

Englewood

Evergreen

Sheridan

Cherry Hills Village

Greenwood Village

Dakota Ridge

Cherry Creek

Cherry Creek

Centennial

Dove Valley

Littleton

Ken Caryl

Highlands Ranch

Stonegate

Lone Tree

Parker

Castle Pines

The Pinery

Castle Rock

Miles

0   5   10

Limited English Proficient Vietnamese-Speaking Population Distribution

Vietnamese-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

Less than .03%
.03% or Greater

RTD Service
- - - Peak Only Frequent Bus
—— All Day Frequent Bus
—— All Other Bus
—— RTD Rail
RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Limited English Proficient Languages of Western Africa-Speaking Population Distribution

N

Longmont

Gunbarrel

Erie

Boulder

Lafayette

Todd Creek

Brighton

Louisville

Superior

Broomfield

Thornton

Northglenn

Commerce City

Westminster

Federal Heights

Shaw Heights   Welby

Sherrelwood

Arvada

Twin Lakes   Derby

Fairmount

Berkley

Golden   Wheat Ridge

Applewood

Edgewater

West Pleasant View

Denver

Aurora

Glendale

Lakewood

Englewood

Sheridan

Cherry Hills Village

Greenwood Village

Cherry Creek

Centennial

Evergreen

Dakota Ridge

Dove Valley

Littleton

Ken Caryl

Highlands Ranch

Stonegate

Lone Tree

Parker

Castle Pines

The Pinery

Castle Rock

Languages of Western Africa-Speaking LEP Population Percentage by Census Public Use Microdata Area (PUMA)

- Less than .04%
- .04% or Greater

RTD Service

- – – – Peak Only Frequent Bus
- ——— All Day Frequent Bus
- ——— All Other Bus
- ——— RTD Rail
- ⌐ ⌐ ⌐ RTD District

Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Miles
0   5   10

Factor 2: Frequency of Contact with LEP Persons

Prepared by RTD Market Research | July 2021

Four Factor Analysis: Factor 2

Table of Contents

Four Factor Analysis: Factor 2

Four Factor Analysis: Factor 2

Background

In accordance with Title VI and the FTA's policy guidance, transit agencies are required to establish, monitor and update their Language Access Plan (LAP) to mitigate language barriers that could prevent Limited English Proficient (LEP) persons from accessing agency programs and services.[1] The LAP is developed utilizing the U.S. Department of Transportation's (USDOT) LEP Guidance Handbook. The USDOT provides guidance to transit agencies receiving federal funding based upon the determination of need, using a Four Factor Analysis. This Analysis includes these criteria:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by an RTD program, activity or service.
2. The frequency with which LEP persons interact with RTD programs, activities or services.
3. The nature and importance of programs, activities or services provided by RTD to the LEP population.
4. The resources available to RTD and overall cost to provide language assistance.

Effective February 2021, the LAP research workgroup, made up of Transit Equity and Market Research staff, convened to initiate the update of RTD's Four Factor Analysis. To complete Factor 2, the LAP research workgroup conducted surveys with frontline employees who interact with customers.

Core Research Questions

Since frontline staff are often the first contact LEP customers have with RTD, this research is designed to answer the following:

- How often do frontline employees interact with LEP customers, and where do these interactions take place?
- How do frontline employees communicate with LEP customers?
- What types of questions do LEP customers ask frontline employees?
- Do frontline employees have difficulty communicating with LEP customers?
- Are frontline employees aware of materials, services or tools that RTD uses to communicate with LEP customers?
- Are there additional materials, services or tools RTD can use to improve communications?
- Do frontline employees speak a foreign language with LEP customers?
- What can RTD do to better prepare frontline employees to assist LEP customers?

Methodology

RTD conducted the survey from May 21, 2021 through June 13, 2021. Surveys were distributed to frontline employees via Division Managers and liaisons at RTD contracted agencies, including Allied Universal Security, Denver Transit Operators, First Transit, MV Transportation, Transdev and Via Mobility Services.[2] The survey was offered in both a paper and online format.

The survey closed on June 13, 2021 with 614 responses, including 141 responses to the online version and 473 responses to the paper version.

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[1] To view policy guidance, please see *Regulatory Background* in the Appendix.
[2] For a summary of the percentages of contracted employees and the contractor they work for, please see Figures 20 and 21.

Executive Summary

- **Respondents interact with both non-LEP and LEP customers frequently.** Most respondents interact with customers a few times per week or more (96%). Many respondents also say they interact with LEP customers a few times per week or more (67%).
- **Most interactions occur in-person on buses, trains, and at stations/stops.** 89% of interactions with LEP customers occur in-person, typically on a bus (76%), at a station or stop (32%), or on a train (19%).
- **LEP customers typically ask respondents about trip-specific activities such as trip planning, fares, or schedules.** Most often, LEP customers ask questions about directions or trip planning (76%), RTD fares (68%), or RTD schedules (60%). Most respondents direct LEP customers to RTD Customer Care (31%), informational signage (30%), or to the RTD website (29%).
- **A majority of respondents have a difficult time communicating with LEP customers.** Over half (57%) of respondents describe their experiences communicating with LEP customers as very or somewhat difficult (10% and 47%, respectively).
- **Few respondents feel equipped to communicate with LEP customers.** Only 35% of respondents feel equipped to communicate with LEP customers. Few are aware of the materials, tools, and services RTD offers to help employees communicate with LEP customers (31%). Of those who are aware, most know of RTD Customer Care (77%) and translations through the RTD website (43%).
- **Respondents want more translated materials, a translation device, a direct phone line for translation services, and language classes to improve communication with LEP customers.** Respondents cite a wide range of materials, services, and tools they would like RTD to offer in order to better communicate with LEP customers. The most prominent theme revolves around offering more translated materials such as brochures, announcements, signage, cards with translations of common phrases, fare information, and schedule information. Respondents would also like a translation device on their phone, computer, or on the vehicle, a direct phone line to a translation service, and language classes to better communicate with LEP customers.
- **About 1 in 4 respondents speak a language other than English fluently; most respondents who speak another language speak Spanish.** 28% of respondents speak another language besides English fluently. Of those who speak another language fluently, 62% speak Spanish.
- **Most respondents cite more translated materials, offering language training classes, having phone lines for translation services, and hiring more bilingual employees will help improve communication with LEP customers.** Respondents state a wide array of solutions RTD can employ to improve communication with LEP customers. The most prominent themes include having more translated materials like signage, announcements, brochures, cards with translations of common phrases, fare and scheduling information, offering language training classes, having phone lines to translation services for both employees and customers, and hiring more bilingual employees.

Discussion and Recommendations

- Many frontline employees interact with LEP customers in-person on a regular basis but have difficultly communicating effectively. RTD should consider offering more translated materials for employees to hand out or reference, increase translated signage on vehicles and at stations and stops, and translate announcements. Translated materials should focus on information about fares, schedules, trip planning, and how to purchase a fare.
- Many frontline employees do not feel equipped to communicate with LEP customers and are unaware of the materials, tools, and services that RTD offers to help them. RTD should consider creating a training program that outlines the processes for communicating with LEP customers. The training should also include the
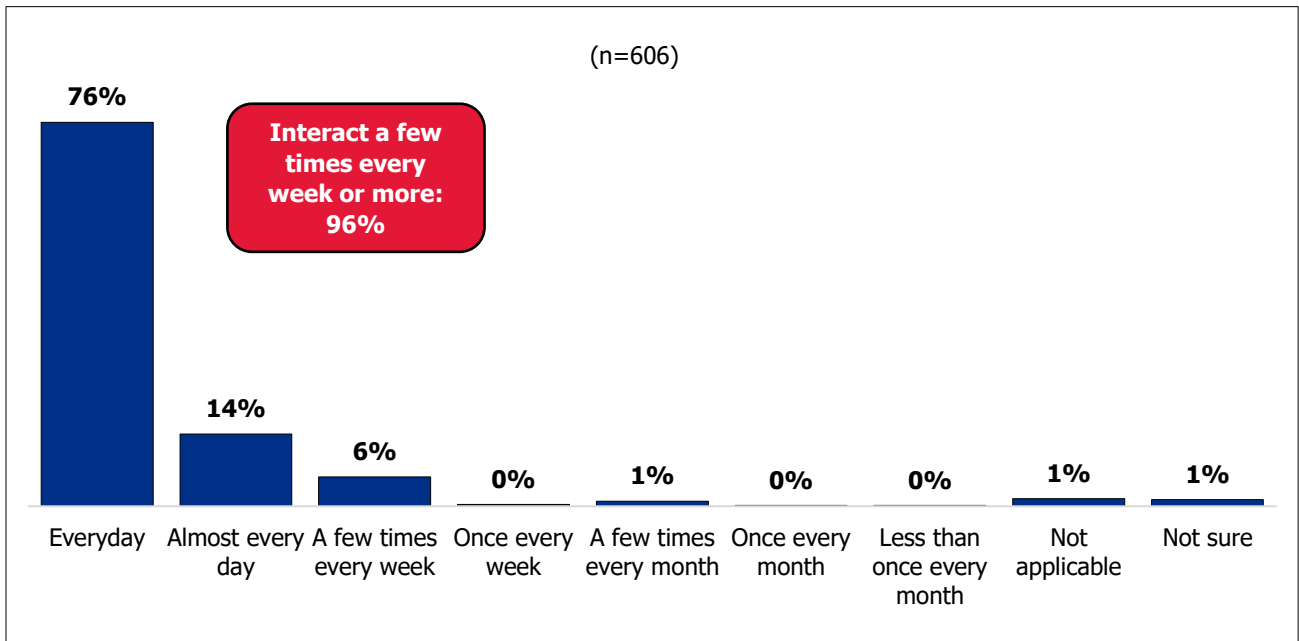
materials, tools, and services available for front-line employees to help improve communications with LEP customers.
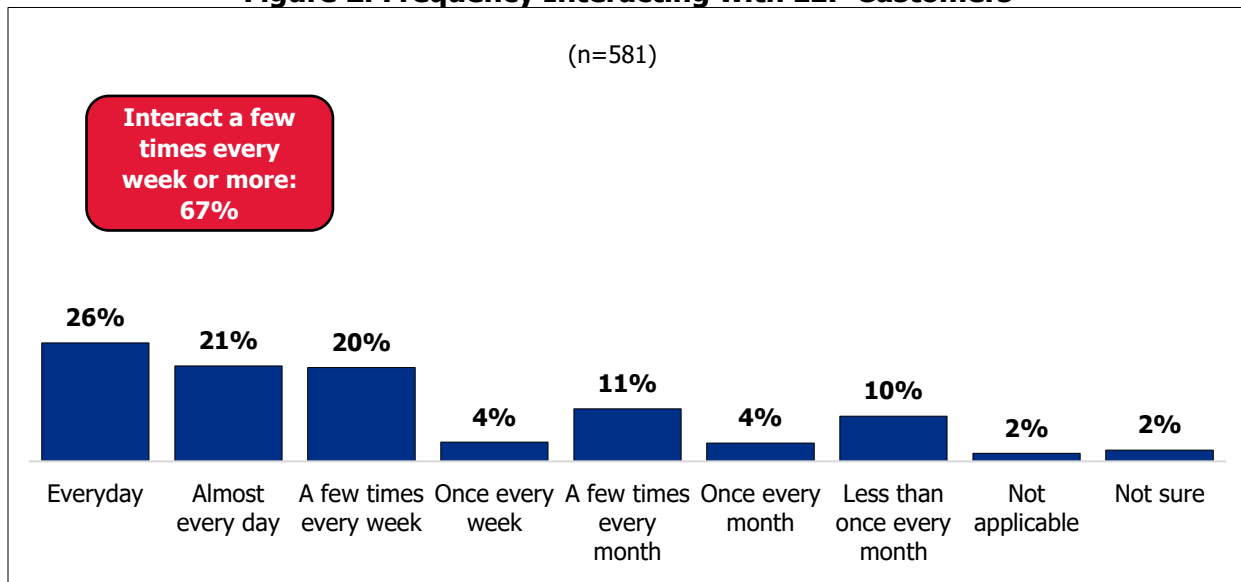
In-Depth Findings

Frequency of Customer Interactions

Almost all respondents interact with customers a few times per week or more (96%), with 76% interacting with customers every day. Interactions with LEP customers are less frequent, with 67% interacting a few times per week or more and only 26% interacting with LEP customers every day.

Figure 1. Frequency Interacting with All Customers

(n=606)

Everyday	Almost every day	A few times every week	Once every week	A few times every month	Once every month	Less than once every month	Not applicable	Not sure
76%	14%	6%	0%	1%	0%	0%	1%	1%

Interact a few times every week or more: 96%

Figure 2. Frequency Interacting with LEP Customers

(n=581)

Interact a few times every week or more: 67%

Everyday	Almost every day	A few times every week	Once every week	A few times every month	Once every month	Less than once every month	Not applicable	Not sure
26%	21%	20%	4%	11%	4%	10%	2%	2%

RTD

Location of LEP Customer Interactions

Most interactions with LEP customers occur in-person (89%) followed by over the phone (10%). Most in-person interactions take place on a bus, at a station or stop, or on a train.

Figure 3. How Employees Typically Interact with LEP Customers

(n=561)

In-person	89%
Over the phone	10%
Online	1%
Not sure	2%
Other	2%
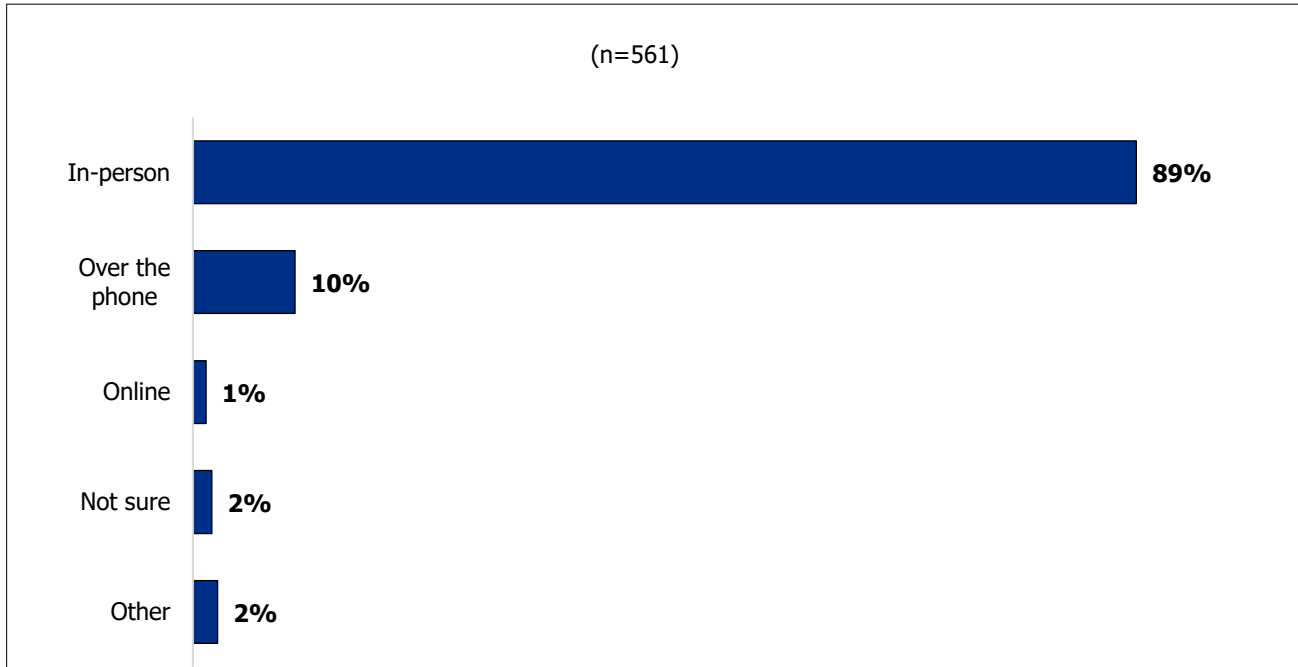
Figure 4. Where Employees Typically Interact with LEP Customers

(n=482)

On a bus	76%
At a station or stop	32%
On a train	19%
At the shops or yard	3%
At an RTD office/ Working from home	2%
At a community event	2%
At an RTD sales outlet	1%
Not sure	2%
Other	4%
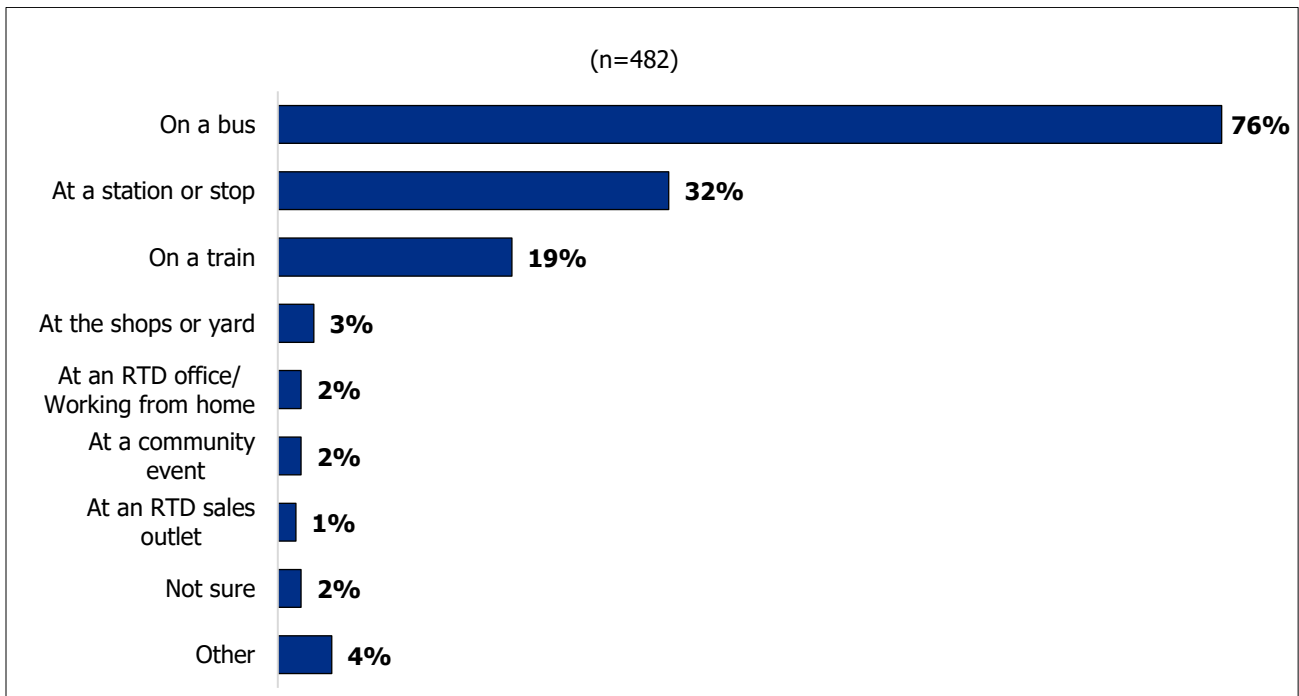
Four Factor Analysis: Factor 2

For those who interact with LEP customers on a bus, on a train, or at a station or stop, RTD asked a follow-up question to determine the bus routes, stations/stops or train lines where most interactions occur. Figures 5 through 7 provide the top five most-reported routes, stations/stops and lines.[3] To view all routes, stations/stops and lines respondents cited, please visit *Employee Interaction Locations* in the Appendix.

Figure 5. Bus Routes with Frequent LEP Contact

Bus Route	Count of Responses
15	42
15L	35
16	33
105	28
0	27

Figure 6. Stations or Stops with Frequent LEP Contact

Station/Stop	Count of Responses
Union Station	53
I-25 & Broadway	12
Peoria	12
Civic Center	10
Downtown Boulder	7

Figure 7. Train Lines with Frequent LEP Contact

Train Line	Count of Responses
W	21
D	19
E	19
H	17
R	16

LEP Customer Interactions

Respondents report most LEP customers ask questions about directions or trip planning, fares, schedules or how to buy a ticket. Figure 8 on the next page shows the breakdown of topics.

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[3] Many respondents (139) state interacting with LEP customers on all or many different routes, stations/stops, or trains without providing specific routes, stations/stops, or train lines.
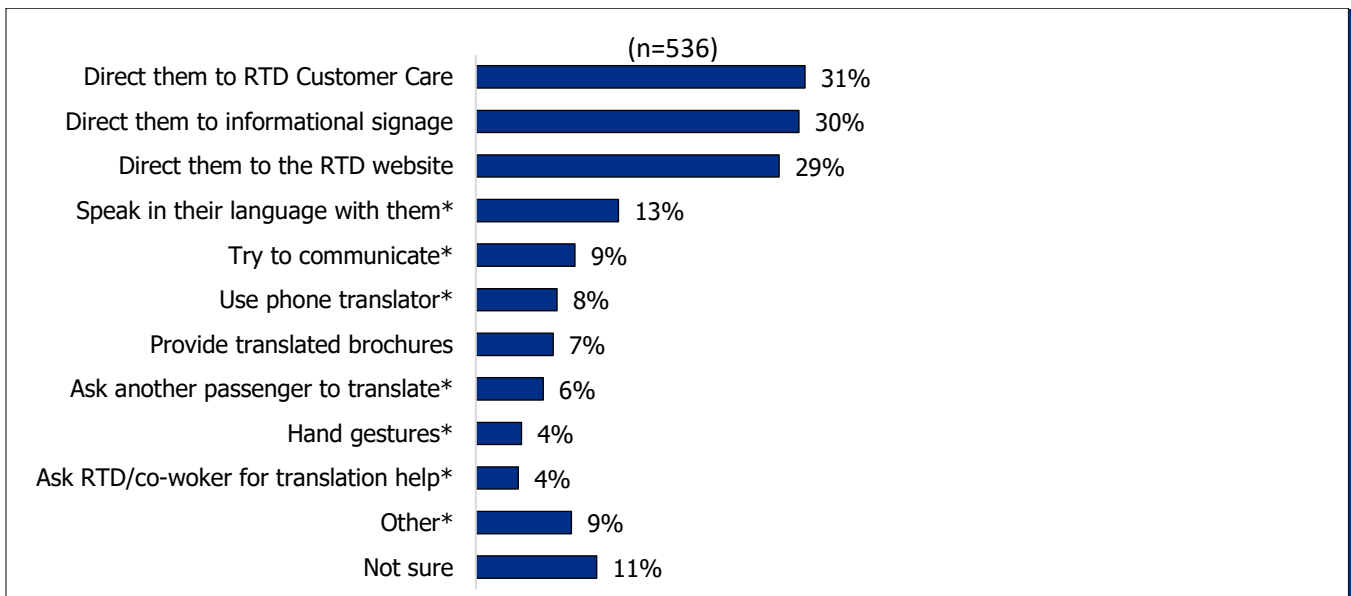
Figure 8. Topics LEP Customers Ask Questions About

(n=543)

Topic	Percentage
Directions/Trip planning	76%
RTD Fares	68%
RTD schedules	60%
How to buy a ticket or pass	36%
How to use ticket validators	16%
How to file a complaint	10%
How to make a reservation for an accessible vehicle	7%
Language interpretation services	7%
Translation of public documents	5%
Not sure	10%
Other	9%
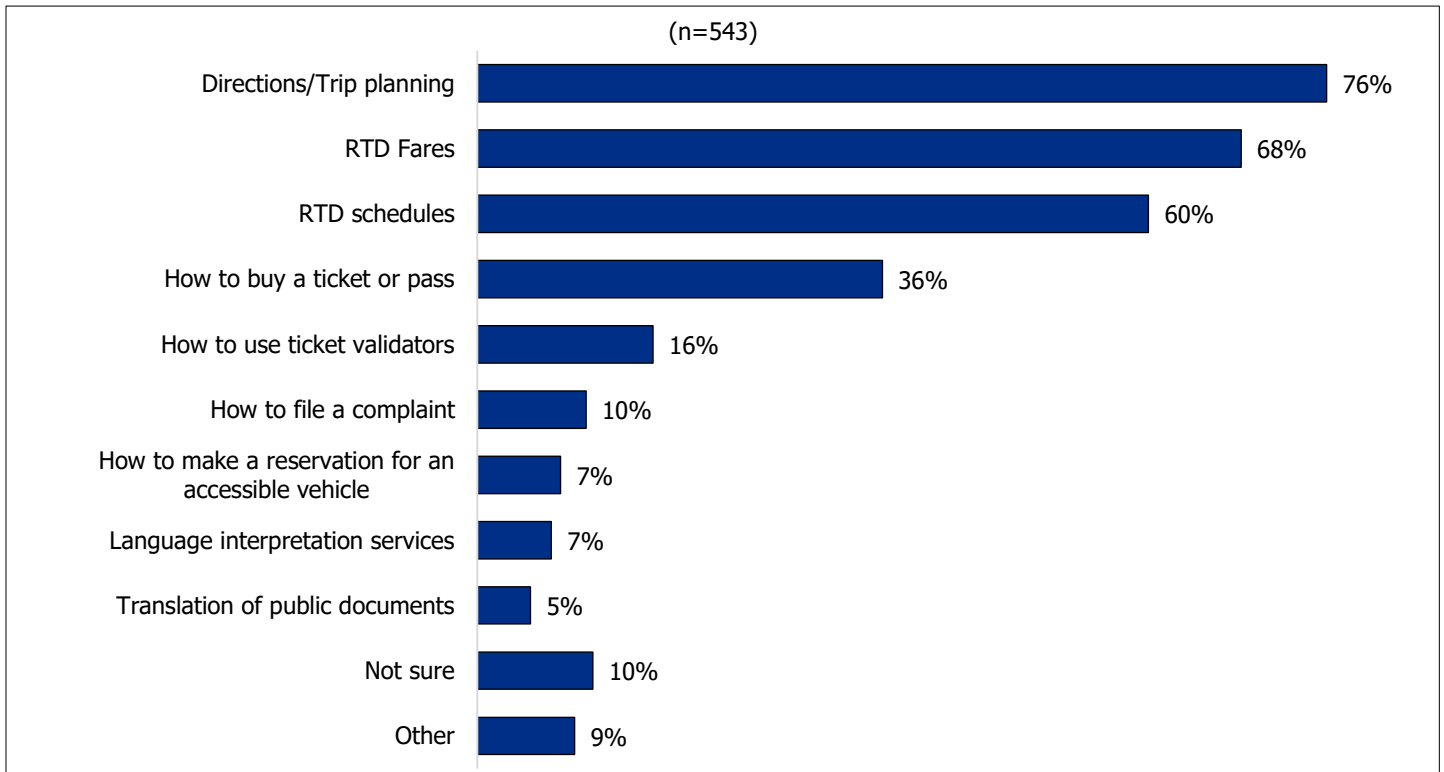
Respondents typically communicate with LEP customers by directing them to RTD Customer Care (31%), informational signage (30%), or the RTD website (29%).

Figure 9. How Employees Communicate with LEP Customers

(n=536)

Method	Percentage
Direct them to RTD Customer Care	31%
Direct them to informational signage	30%
Direct them to the RTD website	29%
Speak in their language with them*	13%
Try to communicate*	9%
Use phone translator*	8%
Provide translated brochures	7%
Ask another passenger to translate*	6%
Hand gestures*	4%
Ask RTD/co-woker for translation help*	4%
Other*	9%
Not sure	11%

Four Factor Analysis: Factor 2

*48% of respondents selected "Other (please specify)." RTD coded these responses and included them in Figure 9. All responses with an asterisk (*) are responses written in by respondents.

Difficulty Communicating with LEP Customers
More than half (57%) of respondents have difficulty speaking with LEP customers.

Figure 10. Difficulty Communicating with LEP Customers

(n=547)

Have difficulty interacting with LEP customers: 57%

- Very difficult: 10%
- Somewhat difficult: 47%
- Somewhat easy: 31%
- Very easy: 8%
- Not sure: 3%
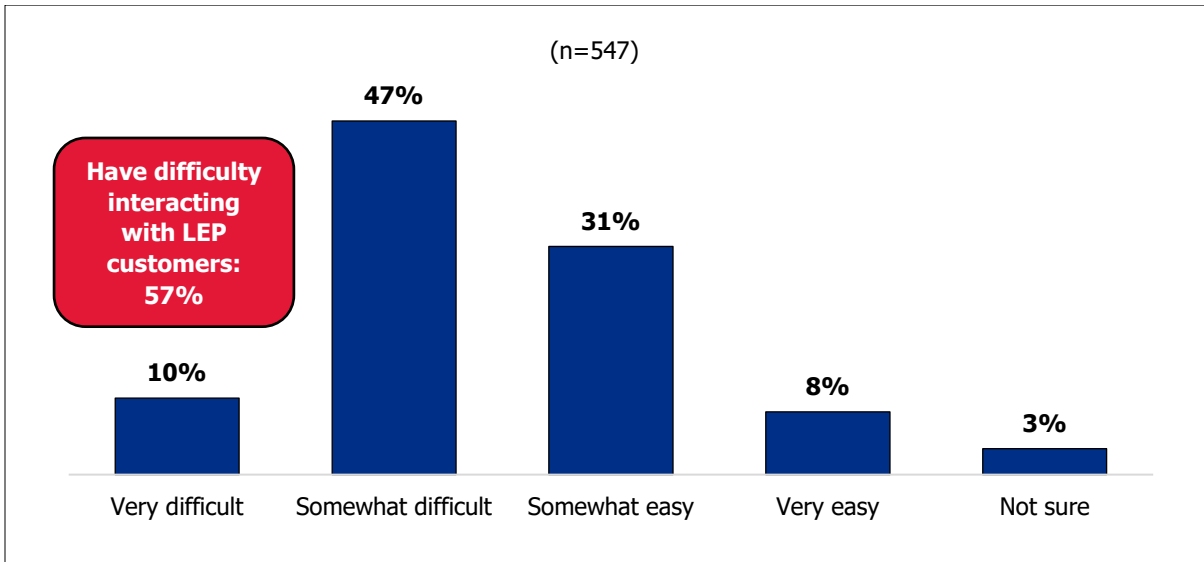
RTD Materials, Tools, and Services
Few respondents (35%) feel equipped to speak with LEP customers.

Figure 11. Feel Equipped to Communicate with LEP Customers

(n=567)

- Yes: 35%
- No: 43%
- Not Sure: 22%
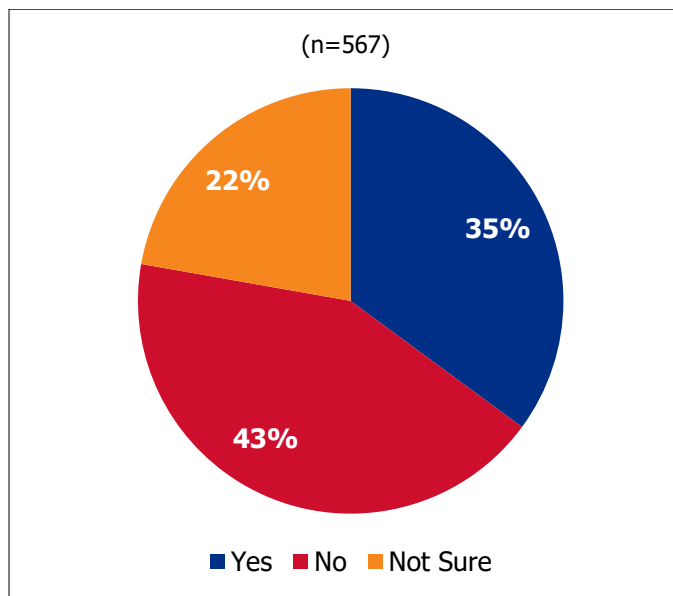
Four Factor Analysis: Factor 2

Few respondents (31%) know about the materials, services and tools available to help them communicate with LEP customers. Of those who are aware of the materials, services and tools available, most are aware of RTD Customer Care (77%) and translations through the RTD website (43%).

Figure 12. Aware of RTD LEP Materials, Services, Tools

(n=543)

- 31% Yes
- 54% No
- 15% Not sure

■ Yes ■ No ■ Not sure
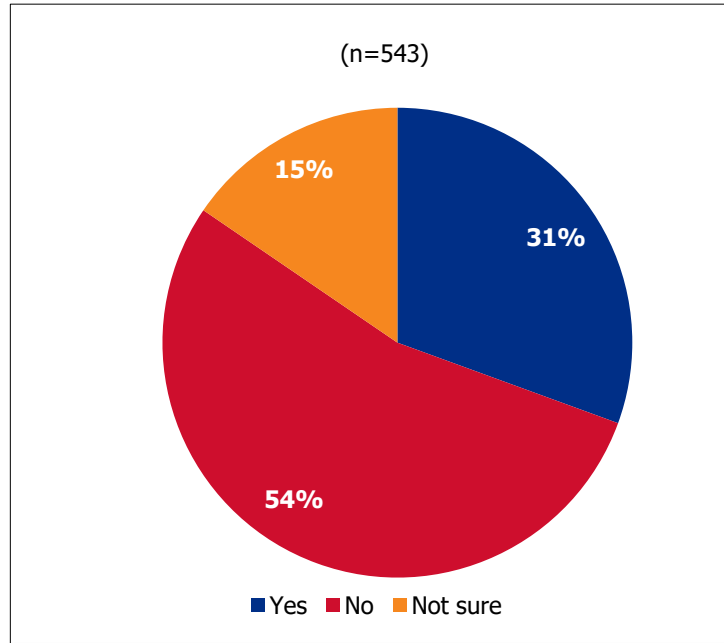
Figure 13. Materials, Services and Tools Employees Are Aware Of

(n=171)

Category	Percentage
RTD Customer Care	77%
Translations through the RTD website	43%
Announcements in Spanish	23%
Channel cards in Spanish	11%
Bilingual Pamphlets/brochures*	6%
Signage on vehicles/stations*	5%
External translator*	4%
RTD Telephone Information Center*	2%
Other	7%
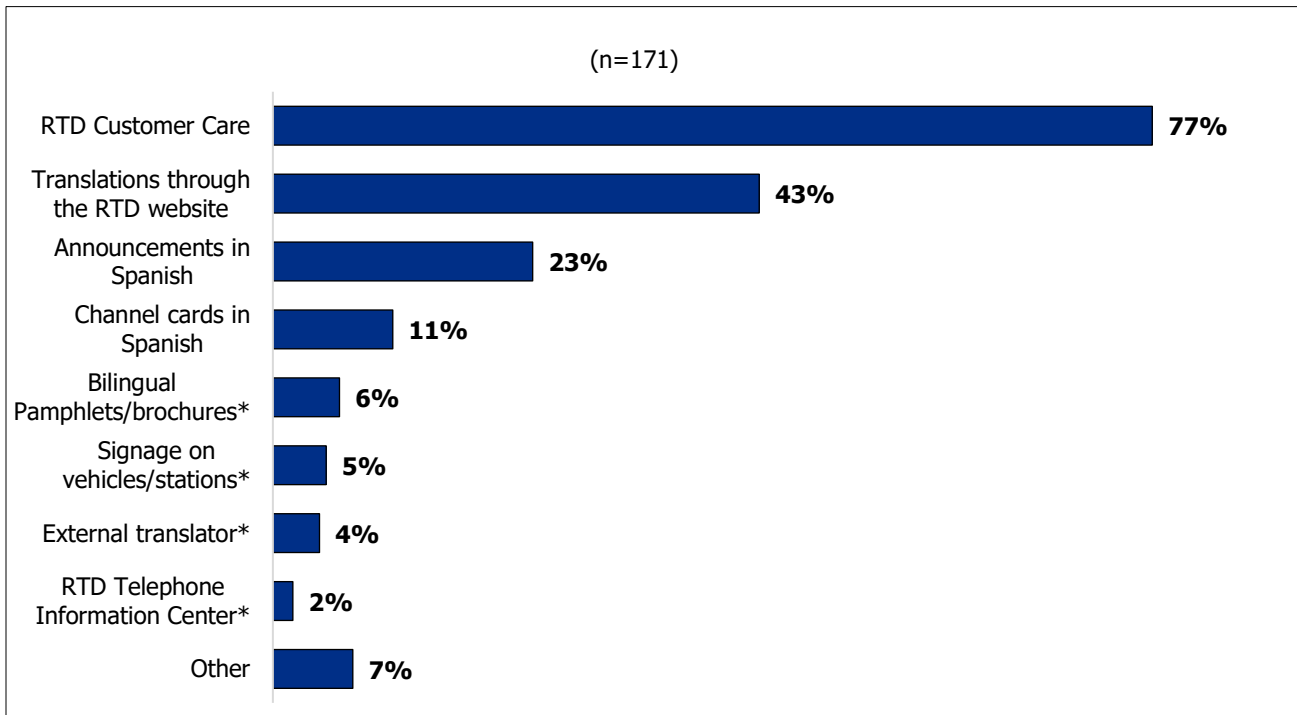
*23% of respondents selected "Other (please specify)." RTD coded these responses and included them in Figure 13. All responses with an asterisk (*) are responses written in by respondents.

Additional Materials, Tools and Services Needed

To determine what additional materials, tools and services RTD frontline employees want to help them communicate with LEP customers, RTD asked an open-ended question and coded responses into overarching themes. Figure 14 summarizes those themes.

Figure 14. Translated Materials to Improve Communication with LEP Customers

Materials for Translation
Announcements
Signage
Cards with translation of common words/phrases
Brochures/Pamphlets
Fare information
Schedule information

The following section highlights responses related to translated materials. Please note responses are taken directly from the survey and have not been altered in any way.

Translated Materials

- Announcements played on the train in multiple languages
- Brochures in multiple languages
- Signs inside the train in multiple languages
- Signs and kiosks in the stations in multiple languages
- Online resources in multiple languages
- Card on buses where passengers can point to picture/phrase in Spanish that includes English reference for driver. Focus on common phrases.
- Announcements also in Spanish.
- Signs at major bus stops/train stations in multiple languages for customer service, route information, etc.
- Have bus fares in Spanish
- Have ASA in Spanish
- Schedules in other languages (common ones)
- Signage in other common languages

Other prominent themes respondents reported include: a translation tool for frontline employees either on a phone, app, or computer, a direct phone number for translation services, and offering language training classes. The following section highlights responses for each of these themes.

A Translation Tool for Frontline Employees

Four Factor Analysis: Factor 2

- Best one I think would be a translator app
- a translator program on the computer
- Translator be installed in buses
- Interpreter tool integrated in copilot
- Implementing a translation app that we, the drivers, can use openly while on the bus without getting in trouble

Direct Phone Number for Translation Services

- Interpreter lines would make it easier to communicate out in the field when interacting with patrons
- An interpreter on call with a phone number to call
- Designated interpreters call in service
- Interpreters in multi languages via a hotline
- Maybe a phone service or making signage easier to understand and navigate at Union

Offering Language Training Classes

- Education. Education. Education. RTD should offer language education to all interested operators
- Language class for RTD bus operator
- Offer a Spanish class designed around word usage using the bus/train operation (common phrases and nouns)
- MORE CONVERSATIONAL SPANISH COURSES - CONVENIENT TO DRIVERS SCHEDULES - PREDOMINATE LANGUAGE ISSUE BRING IN AN ESL TYPE INSTRUCTOR W/TIPS ON HOW TO COMMUNICATE W/OTHER LANGUAGES
- Offer basic language skills courses/training for employees/contractors

Employee Foreign Language Abilities

About 1 in 4 respondents speak a language besides English fluently. Of those who speak another language, Spanish is the most common (62%)[4].

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[4] The full list of languages spoken by respondents is included in Languages Spoken by Employees in the Appendix.

Four Factor Analysis: Factor 2

Figure 15. Speak Another Language Fluently Other Than English?

(n=541)

- **28%** Yes
- **70%** No
- **1%** Not sure

Yes ■ **No** ■ **Not sure**
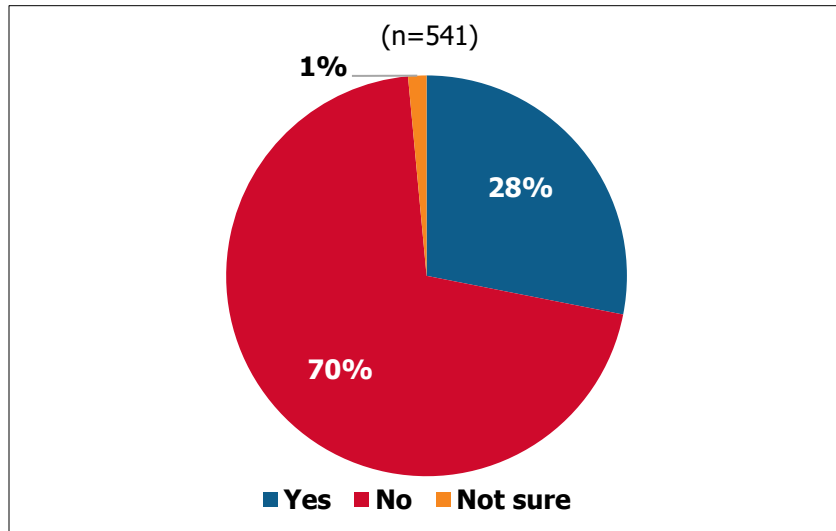
Figure 16. Languages Spoken Fluently Besides English

(n=157)

Language	Percent
Spanish	62%
French	12%
Amharic	11%
Arabic	8%
German*	4%
Portuguese*	4%
Oromo*	4%
American Sign Language*	3%
Italian*	3%
Japanese	3%
Other	15%
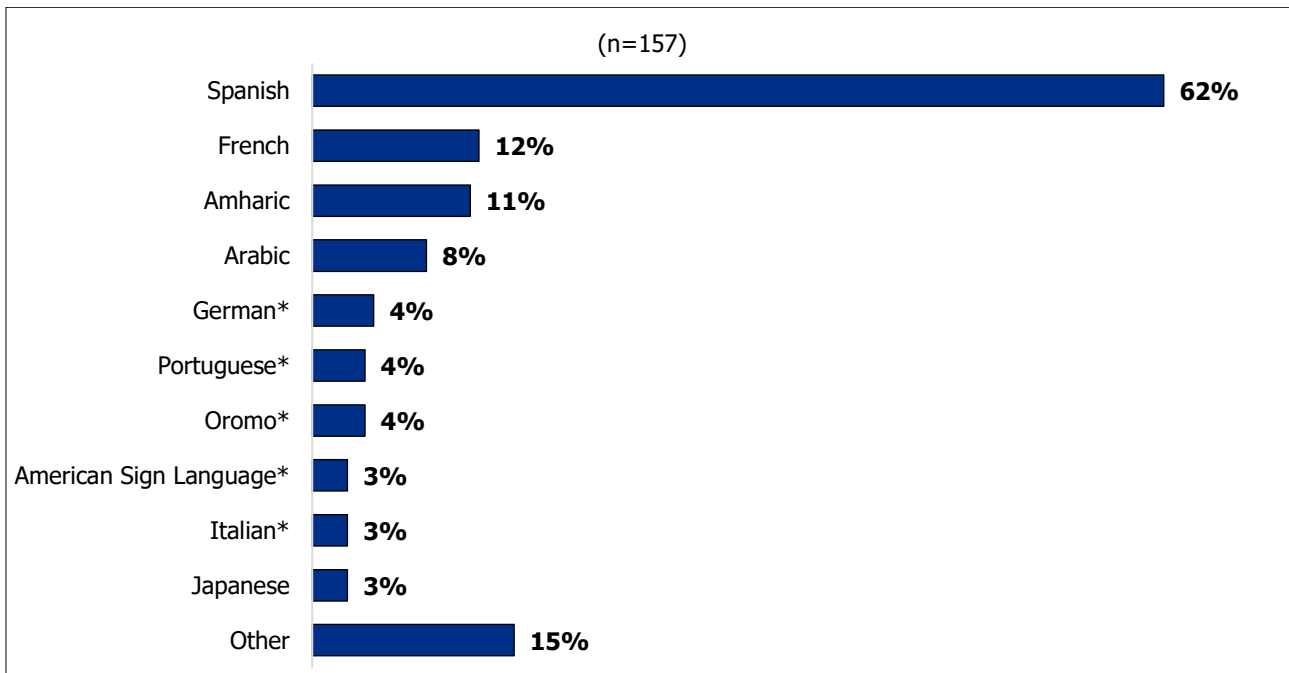
*37% of respondents selected "Other (please specify)." RTD coded these responses and included them in Figure 16. All responses with an asterisk (*) are responses written in by respondents.

Over half of respondents who speak a foreign language speak in that language with customers a few times per week or more (56%). Most of those respondents speak Spanish with LEP customers (75%).

Four Factor Analysis: Factor 2

Figure 17. Frequency of Speaking Language Other than English with Customers

(n=157)

Interact a few times every week or more: 56%

Everyday	Almost every day	A few times every week	Once every week	A few times every month	Once every month	Less than once every month	Not applicable	Not sure
24%	15%	17%	5%	9%	2%	15%	12%	3%
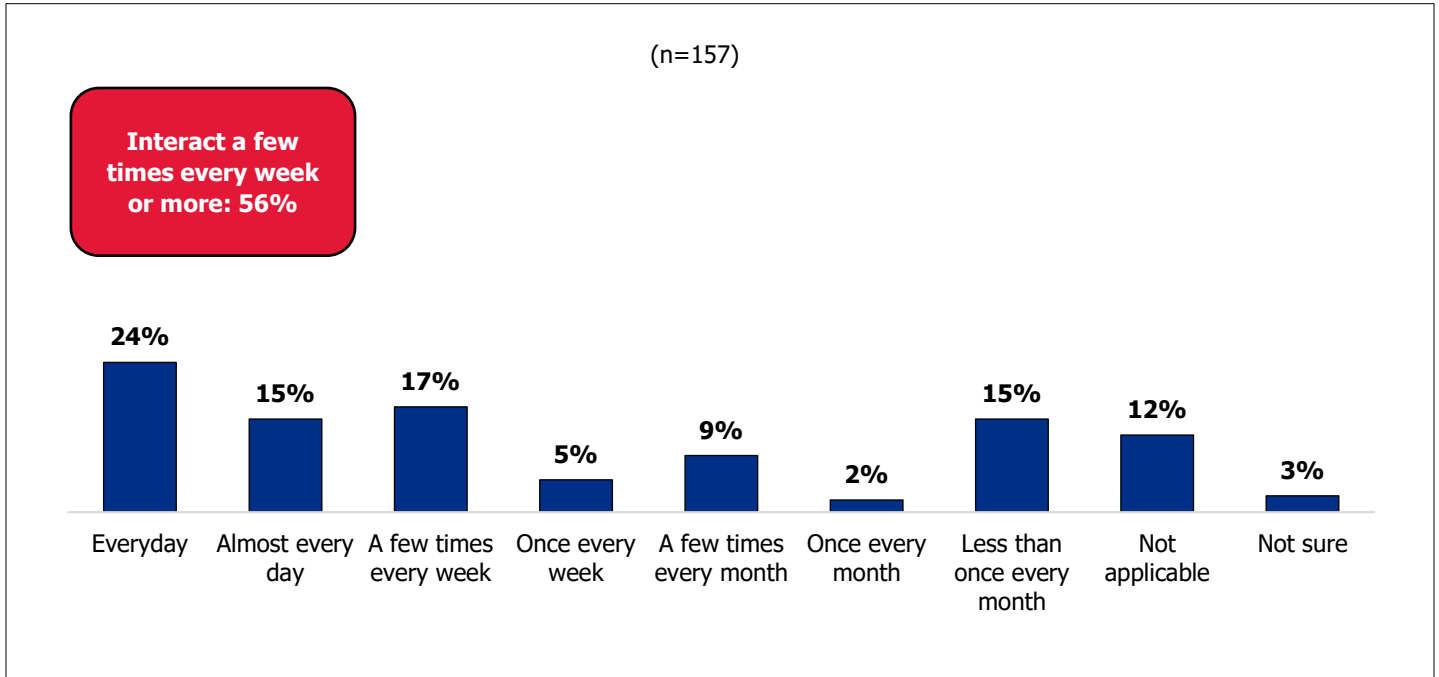
Figure 18. Language Spoken with Customers Most Often[5]

(n=132)

Language	%
Spanish	75%
Amharic	6%
Arabic	3%
American Sign Language*	2%
Korean	2%
French	2%
Vietnamese	1%
Nepali	1%
Japanese	1%
Chinese	0%
Russian	0%
Other	8%

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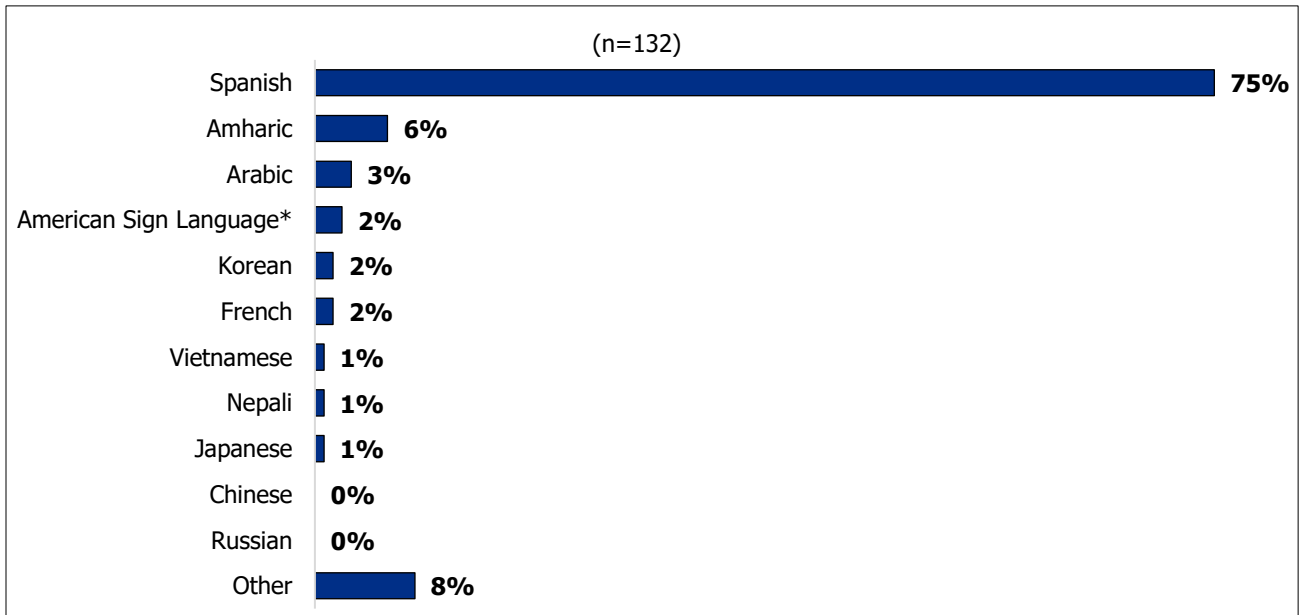
[5] The percent of respondents who selected Spanish at Languages Spoken Most Often with Customers is higher than Languages Spoken Besides English. This is due to two main reasons: some respondents skipped Languages Spoken Besides English but answered Languages Spoken Most Often with Customers; other respondents did not select Spanish at Languages Spoken Besides English but selected Spanish at Languages Spoken Most Often with Customers.

Four Factor Analysis: Factor 2

*10% of respondents selected "Other (please specify)." RTD coded these responses and included them in Figure 18. All responses with an asterisk (*) are responses written in by respondents.

Improvements to RTD's Language Assistance Services
RTD asked an open-ended question to solicit suggestions for improving RTD's language assistance services and coded responses into overarching themes. The most prominent themes revolve around providing operators with more translated materials, offering language training classes, providing a phone line for language translation services for both operators and customers and hiring more bilingual employees.

Many respondents state they would like access to more translated materials. Figure 19 shows the most common types of translated materials respondents cited.

Figure 19. Translated Materials for LEP Customers

Materials for Translation
Signage
Announcements
Brochures/Pamphlets
Cards with translation of common words/phrases
Fare information
Schedule information

The next sections highlight responses related to the most prominent themes. Please note responses are taken directly from the survey and have not been altered in any way.

Translated Materials

- Provide brochures in applicable languages on the trains
- Introduce Spanish Speaking Announcements on the Bus; announcing next stop, or the Bus is intersecting with another Bus Route
- (make more signs available in their language)
- Cards with questions + answers in English + other languages might help drivers with these types of passengers
- Multiple language info about schedules/fares on train

Offer Language Training Classes

- Offer classes to learn other languages for those who are in daily contact with people who speak limited to no English
- do more classes in language for the bus drivers who need to speak in limited customers services!
- -Classes for operators online or app so we can learn on our schedules -Flash cards with common phrases
- Maybe Spanish language training with onus on transportation type information such as - :"that bus is canceled or going to be late," "That bus is delayed until X time." Maybe have a phone number where a specific language need can be directed. Someone with the language and knowledge of bus/train operations can answer questions
- Additional Spanish classes would help / took Spanish in High school / I forgot more than remember

Four Factor Analysis: Factor 2

Direct Phone Number for Translation Services for Operators and Customers

- Setting up or contracting a translation service customers or employee's can call into to speak with a fluent translator, to include possible video options for ASL
- Maybe a # that can be called for translation
- Direct access to language line, or line access that customers can call in for language assistance
- Have a particular line so that they can look up or call for directions. Have phone schedules in other languages for them. Maps in different languages for them
- Perhaps retain a service they could call that would have access to translators by phone would help

Hiring More Bilingual Employees

- Hire more Bilingual employees
- Hire more people who speak different languages. Pay well for these who speak more than one language fluently
- - have more bilingual employees - have a number passengers can call to reach someone bilingual
- Hire more multilingual employees
- Add a Spanish fluent DCRL team member

Respondent Characteristics

Figures 20 through 24 contain characteristics from employees who participated in the LAP Survey.

Figure 20. RTD vs. Contracted Employee

(n=599)

49% 51%

■ RTD Employee ■ Contracted Employee
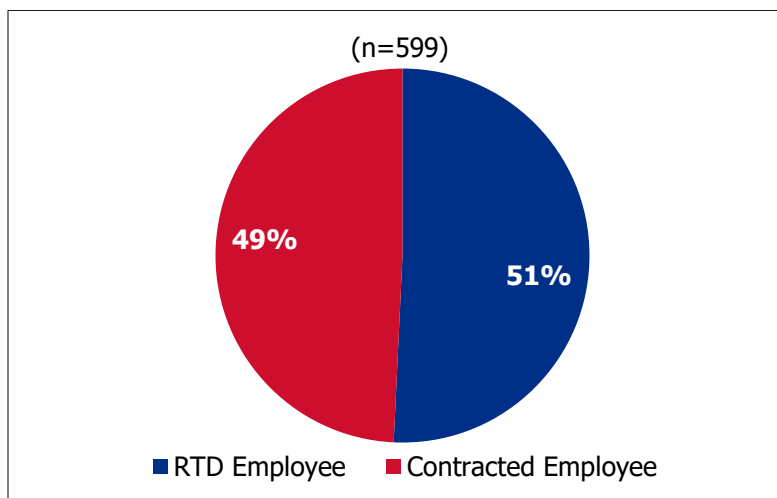
Four Factor Analysis: Factor 2

Figure 21. Contractor

(n=299)

Contractor	Percentage
First Transit	32%
Allied Universal Security	24%
Transdev	15%
Via Mobility Services	14%
MV Transportation	13%
Denver Transit Operators	1%
Other	0%

Figure 22. Department[6]

(n=285)

Department	Percentage
Operations (Bus)	71%
Operations (Rail)	16%
Communications	11%
Operations (Paratransit)	2%
Safety, Security, and Asset Management	0%
Finance and Administration	0%
Planning	0%
Captial Programs	0%
Board Office	0%
Executive Office	0%
General Counsel	0%
Operations (Service Development)	0%
No sure	0%

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[6] *Figure 22: Department Worked For* is based to respondents who work for RTD. Contracted employees showed inconsistencies in responses for department worked for.

Four Factor Analysis: Factor 2

Figure 23. Tenure at RTD

(n=600)

- Less than 1 year: 8%
- 1 year to less than 3 years: 26%
- 3 years to less than 5 years: 17%
- 5 years to less than 10 years: 21%
- 10 years or more: 28%
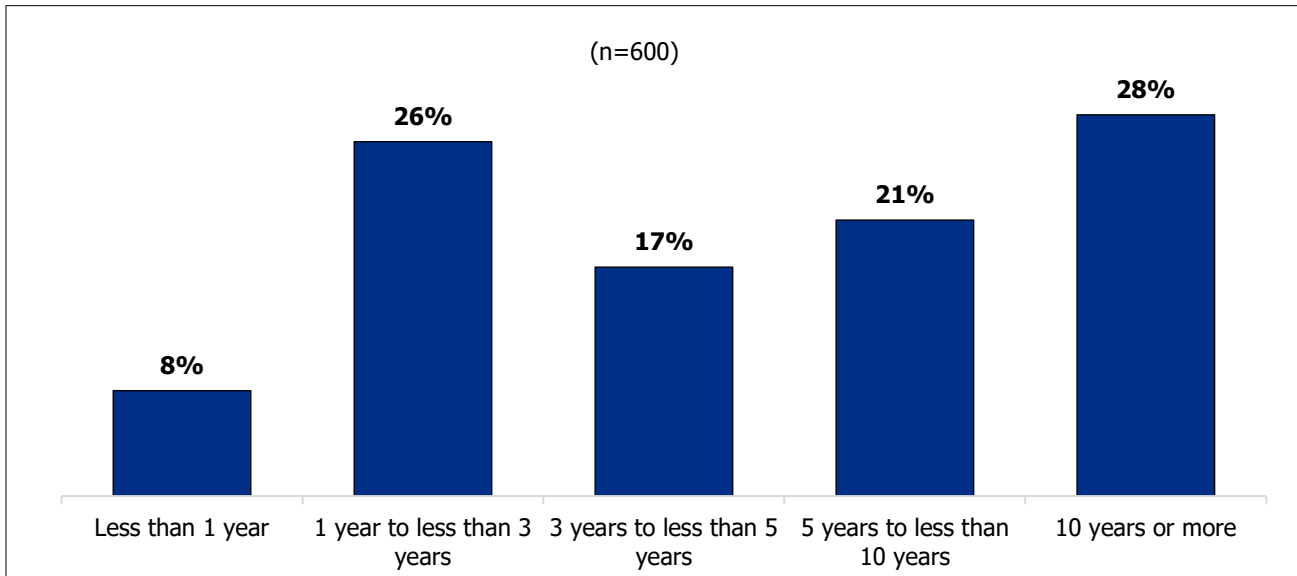
Figure 24. Job Title (Top 10)[7]

Job Title	Count of Responses
Bus Operator	369
Transit Security Officer	48
Train Operator	46
Independent Contractor	29
Customer Care	12
Telephone Information Specialist	9
Bus Operator / Trainer	8
Supervisor, Telephone Information Center	6
Bilingual Information Specialist	5
Road Supervisor	5

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[7] To view all job titles, please see *Job Title* in the Appendix.

Appendix

Regulatory Background

1. <u>Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq</u>., and its implementing regulations provide 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 otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on persons with limited English proficiency (LEP) because such conduct constitutes national origin discrimination.

2. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Four Factor Analysis: Factor 2

Survey Announcement Email

Subject line: RTD Employee Language Assistance Survey

Attention RTD Colleagues:

From Monday, May 24 through Sunday, June 13, the Civil Rights Division will conduct a brief survey with employees to determine how and at what frequency frontline employees interact with customers who speak limited or no English. This survey is being conducted in accordance with Title VI requirements set forth by the Federal Transit Administration (FTA), U.S. Department of Transportation and Executive Order 13166. RTD will use the results of this survey to ensure meaningful access for numerous language groups in our service district as well as to determine what resources and training employees may need to better serve our limited-English-speaking customers. All employees who interact with customers, either in-person, over the phone or digitally (e.g., email, social media) are to participate.

Beginning Monday, May 24, we will launch the survey and begin collecting data. At this time, we will share the survey link with you. We kindly ask that you share the email containing the link with members of your team who interact with customers, either in-person, over the phone, or digitally. Participation is voluntary, but strongly encouraged. We anticipate the survey will take about 15 minutes or less to complete.

Should you or any of your staff have any questions, please contact RTD Market Research at 303-299-2142 or email MarketResearch@rtd-denver.com.

Thank you for your time and support.

Regards,

Carl Green Jr., MPA

Manager, Transit Equity
Civil Rights Division
Regional Transportation District
1660 Blake Street, BLK-31
Denver, CO 80202

Survey Launch Email

Subject line: RTD Employee Language Assistance Survey is Live

Attention RTD Colleagues:

The Civil Rights Division is conducting a brief survey with employees to determine how and at what frequency frontline employees interact with customers who speak limited or no English. All employees who interact with customers, either in-person, over the phone or digitally (e.g., email, social media) are invited to participate. This survey is being conducted in accordance with Title VI requirements set forth by the FTA, U.S. DOT, and EO 13166. RTD will use the results of this survey to ensure meaningful access for numerous language groups in our service district as well as to determine what resources and training employees may need to better serve our limited-English-speaking customers.

Please share this email with members of your team who interact with customers, either in-person, over the phone, or digitally. Here is the link to complete the survey.

www.surveymonkey.com/r/employeelap

We anticipate it will take about 15 minutes or less to complete the survey. Participation is voluntary, but strongly encouraged. **Represented employees who complete the survey will be paid for 20 minutes regular pay. Represented employees who complete the survey should notify their manager so that they may be reimbursed. Please use the payroll code LAS in Workday or Lang Access Survey-LAS in Kronos to compensate represented employees.** The code is categorized under non-working hours and will be without overtime.

The deadline to submit a survey is 11:59 PM MT on Sunday June 13, 2021.

All responses will remain strictly confidential. Additionally, responses will be reported in group form to protect the identity of employees. Should you or any of your staff have any questions, please contact RTD Market Research at 303-299-2142 or email MarketResearch@rtd-denver.com.

Thank you taking time to participate in this important survey.

Regards,

Carl Green Jr., MPA

Manager, Transit Equity
Civil Rights Division
Regional Transportation District
1660 Blake Street, BLK-31
Denver, CO 80202

Four Factor Analysis: Factor 2

Instructions for Frontline Employees

Instructions for RTD Employee/Contractor Language Assistance Survey

- Market Research is conducting this survey on behalf of The Civil Rights Division. We are surveying all frontline employees and contractors who interact with customers either in-person, over the phone, or digitally (e.g., email, social media).

- The goals of this survey are to:

  o Determine the frequency with which frontline staff interact with customers who speak limited English.
  o Determine what tools/resources frontline staff need to better communicate with limited-English customers.

- RTD will use the results of this survey to inform what tool/resources it can provide frontline staff to help them better communicate with limited-English customers.

- A hard copy of the survey has been placed in the mailboxes for all operators and street supervisors. If you prefer to complete the survey online, please use this link: www.surveymonkey.com/r/employeelap.

- All other staff, please complete the survey by visiting this link: www.surveymonkey.com/r/employeelap. If you prefer to complete a hard copy of the survey may contact RTD Market Research at MarketResearch@rtd-denver.com or call 303-299-2142.

- We anticipate the survey will take about 15 minutes or less to complete. Participation is voluntary, but strongly encouraged.

- All employees will be paid for completing the survey.

- All responses will remain strictly confidential. Additionally, responses will be reported in group form to protect the identity of employees.

- **The survey will remain open from Monday, May 24 until Sunday, June 13, 2021.**

- Should you or any of your staff have any questions, please contact RTD Market Research at 303-299-2142 or email MarketResearch@rtd-denver.com.

- **Thank you again for your help in coordinating this survey. We sincerely appreciate your time.**

Four Factor Analysis: Factor 2

Instructions for Division Managers

Instructions for RTD Employee Language Assistance Survey – Division Managers

- Market Research is conducting this survey on behalf of The Civil Rights Division. We are surveying all frontline employees who interact with customers either in-person, over the phone, or digitally (e.g., email, social media).

- The goals of this survey are to:
  - Determine the frequency with which frontline employees interact with customers who speak limited English.
  - Determine what tools/resources frontline employees need to better communicate with limited-English customers.

- RTD will use the results of this survey to inform what tool/resources it can provide frontline employees to help them better communicate with limited-English customers.

- Each Division Manager has been given a packet of surveys for their employees to complete. **Please distribute your packet of surveys in mailboxes for all operators and street supervisors at your division. Please collect all completed hard copy surveys and mail them via interoffice mail to Market Research at BLK-21.** You may send completed surveys as you get them or all at once, whichever you prefer.

- Employees who wish to complete a survey online instead of paper may do so using the following link: www.surveymonkey.com/r/employeelap.

- We anticipate the survey will take about 15 minutes or less to complete. Participation is voluntary, but strongly encouraged.

- **All represented employees who complete the survey will be compensated for 20 minutes regular pay. Please use the payroll code LAS to compensate employees.** The code is categorized under non-working hours and will be without overtime.

- All responses will remain strictly confidential. Additionally, responses will be reported in group form to protect the identity of employees.

- **The survey will remain open from Monday, May 24 until Sunday, June 13, 2021.**

- Should you or any of your staff have any questions, please contact RTD Market Research at 303-299-2142 or email MarketResearch@rtd-denver.com.

- **Thank you again for your help in coordinating this survey. We sincerely appreciate your time.**

Employee Interaction Locations

Bus Route	Count of Responses
15L	35
16	33
105	28
0	27
121	22
Access-a-Ride	20
FF1	20
44	15
BOLT	15
JUMP	15
12	14
153	14
SKIP	14
42	13
43	13
45	13
225	13
40	11
Mall Ride	10
48	9
205	9
83L	9
21	8
31	8
DASH	7
1	6
204	6
326	6
327	6
AB	6
3	5

Stations/Stops	Count of Responses
I-25 & Broadway	12
Peoria	12
Civic Center	10
Downtown Boulder	7
30th & Downing	6
Aurora Metro Center	5
Decatur-Federal	5
Florida	5
Nine Mile	5
Alameda	4
Central Park	4
Wagon Road	4
16th & Stout	3
Arapahoe Village Center	3
Englewood	3
10th & Osage	2
16th & California	2
18th & California	2
40th & Colorado	2
Airport Station	2
Auraria	2
Belleview	2
Boulder Transit Center	2
Colfax	2
Dayton	2
Jefferson County Government Center - Golden Station	2
Lincoln	2
Southmoor	2
106th & Melody	1
40th & Airport	1
8th & Coffman PnR	1

Train Lines	Count of Responses
W	21
D	19
E	19
H	17
R	16
A	10
L	10
N	5
C	4
G	3
B	2
F	2

9	5
11	5
19	5
38	5
324	5
120X	5
FF (unspecified)	5
8	4
20	4
112	4
120	4
133	4
135	4
169	4
323	4
AT	4
Bound	4
6	3
10	3
28	3
32	3
51	3
83	3
92	3
130	3
139	3
208	3
Golden Flexride	3
4	2
29	2
35	2
36	2
37	2
65	2
73	2
76	2
228	2

Boulder (unspecified)	1
Boulder Junction	1
Centerpoint	1
Clear Creek / Federal	1
Colfax & Broadway	1
Federal & Florida	1
Lafayette PnR	1
Lakewood-Wadsworth	1
Littleton/Mineral	1
Longmont PnR	1
Oak	1
Platte Valley	1
Ridge Gate	1
Sheridan	1
Sky Ridge	1
Westminster	1

520	2
83D	2
Belleview Flexride	2
Dry Creek Flexride	2
Federal Heights Flexride	2
Flexride (unspecified)	2
LD1	2
NB	2
14	1
30	1
34	1
46	1
66	1
72	1
88	1
100	1
152	1
165	1
120L	1
122X	1
16L	1
88L	1
AAR	1
AB1	1
FF5	1
Green Mountain Flexride	1
Inverness South Flexride	1
LD2	1
LD3	1
Lone Tree Flexride	1
Longmont Flexride	1
NB1	1
NB2	1

Orchard Flexride	1
Platte Valley Flexride	1
Thornton Flexride	1
Other	22
NA	1

Languages Spoken by Employees

Language Spoken	Percent
Spanish	62%
French	12%
Amharic	11%
Arabic	8%
German*	4%
Portuguese*	4%
Oromo*	4%
American Sign Language*	3%
Italian*	3%
Japanese	3%
Hebrew*	2%
Greek*	1%
Hindi*	1%
Kirundi*	1%
Tagalog*	1%
Tigrinya*	1%
Turkish*	1%
African Languages (unspecified)*	1%
American Indian*	1%
Czech*	1%
Danish*	1%
Filipino*	1%
Hausa*	1%
Hmong*	1%
Hungarian*	1%
Igbo*	1%
Indonesian*	1%
Mayan*	1%
Nahuatl*	1%
Navajo*	1%
Palauan*	1%
Persian*	1%

Romanian*	1%
Somali*	1%
Swahili*	1%
Swedish*	1%
Tibetan*	1%
Tohono O'odam*	1%
Urdu*	1%

Four Factor Analysis: Factor 2

*40% of respondents selected "Other (please specify)." RTD coded these responses and included them in the table above. All responses with an asterisk (*) are responses written in by respondents.

Job Title

Job Title	Count
Bus Operator	369
Transit Security Officer	48
Train Operator	46
Independent Contractor	29
Customer Care	12
Telephone Information Specialist	9
Bus Operator / Trainer	8
Supervisor, Telephone Information Center	6
Bilingual Information Specialist	5
Road Supervisor	5
Security, Supervisor	5
Reservations	4
Security (Unspecified)	3
Supervisor (Unspecified)	3
Other	3
Dispatcher	2
Operation Specialist	2
Security, Lieutenant	2
Security, Sergeant	2
Street Supervisor	2
Account Manager	1
Administrative Assistant	1
Administrator, Special Discount Program	1
AGM, Communications	1
Assistant Account Manager	1
Building Access Security	1
Bus Operator / Operations Specialist	1
Customer Care Lead	1
Field Supervisor	1
Fleet Maintenance Manager	1
Landscape Architect	1

Four Factor Analysis: Factor 2

Manager (Unspecified)	1
Manager, Human Resources	1
Manager, Telephone Information Center	1
Manager, Training and Division Relations	1
Paratransit Certification Assistant	1
Paratransit Eligibility Coordinator	1
Pass Production Administrator	1
Payroll (Unspecified)	1
Q.A. Maintenance Manager	1
Security, Captain	1
Security, Supervisor / Field Training Officer	1
Senior AP Technician	1
Service Worker	1
Sign Maintainer	1
Sr. Manager, Marketing	1
Sr. Project Manager	1
Supervisor, Transit Safety Ambassador	1
Trainer	1
Training Manager	1
Transit Security Ambassador	1

Four Factor Analysis: Factor 2

Survey Instrument

RTD Frontline Employee Language Assistance Survey

Thank you for taking time to provide feedback. The Civil Rights Division is conducting this survey with frontline employees to determine if and how they interact with customers who speak limited or no English. RTD is required to conduct this survey per Federal Transit Administration (FTA) requirements. The results will be used inform what tools/resources RTD can provide frontline employees to help them better communicate with limited-English speaking customers.

All responses are completely confidential, and data will be reported in group form only to protect the identity of employees. Should you have any questions, please call 303-299-2142 or send an email to MarketResearch@rtd-denver.com.

Please complete this survey by Sunday, June 13. If you prefer to complete this survey online, please visit this link: www.surveymonkey.com/r/employeelap.

Thank you for taking time to provide feedback in this important survey.

Carl Green Jr., Transit Equity Manager
Civil Rights Division

1. Which of the following best describes your role at RTD?

   ○ I am an RTD employee (SKIP TO QUESTION 3)
   ○ I am a contracted RTD employee

2. Which of the following contractors do you work for?

   ○ Allied Universal Security   ○ MV Transportation   ○ Other (please
   ○ Denver Transit   ○ Transdev   specify)
     Operators   ○ Via Mobility
   ○ First Transit   Services

   _____

3. In which RTD department do you currently work?

   ○ Bus Operations   ○ Finance and   ○ Rail Operations
   ○ Capital   Administration   ○ Safety, Security, and Asset Management
     Programs   ○ Operations   ○ Not sure
   ○ Communications   (Paratransit and
   ○ Executive Office   Service
                              Development)
                            ○ Planning

Four Factor Analysis: Factor 2

4. How long have you worked for RTD?

- ○ Less than 1 year
- ○ 1 year to less than 3 years
- ○ 3 years to less than 5 years
- ○ 5 years to less than 10 years
- ○ 10 years or more

5. What is your official job title?

[   ]

6. About how often do you interact with RTD customers?

- ○ Everyday
- ○ Almost every day
- ○ A few times every week
- ○ Once every week
- ○ A few times every month
- ○ Once every month
- ○ Less than once every month
- ○ Not applicable - I don't interact with customers (SKIP TO QUESTION 20)
- ○ Not sure (SKIP TO QUESTION 20)

7. About how often do you interact with RTD customers who speak limited or no English?

- ○ Everyday
- ○ Almost every day
- ○ A few times every week
- ○ Once every week
- ○ A few times every month
- ○ Once every month
- ○ Less than once every month
- ○ Not applicable - I don't interact with customers who speak limited or no English (SKIP TO QUESTION 20)
- ○ Not sure (SKIP TO QUESTION 20)

8. How do you typically interact with customers who speak limited or no English? (Select all that apply.)

- ☐ In-person
- ☐ Over the phone
- ☐ Online (i.e., email, social media, RTD website, etc.)
- ☐ Not sure
- ☐ Other (please specify): _____

Four Factor Analysis: Factor 2

STOP: IF YOU RESPONDED "IN-PERSON" TO QUESTION 8, PLEASE PROCEED TO QUESTION 9.
IF DID NOT RESPOND "IN-PERSON" TO QUESTION 8, PLEASE PROCEED TO QUESTION 10.

9. Where are you when you typically interact with customers who speak limited or no English? (Select all that apply.)

- ☐ On a bus–Which routes(s) _____
- ☐ On at train–Which lines(s) _____
- ☐ At a station or stop–Which one(s) _____
- ☐ At the shops or yard
- ☐ At an RTD office / working from home
- ☐ At an RTD sales outlet
- ☐ At a community event
- ☐ Not sure
- ☐ Other (please specify): _____

10. Which of the following topics, if any, do customers who speak limited or no English ask you questions about? (Select all that apply.)

- ☐ RTD fares
- ☐ RTD schedules
- ☐ Directions/Trip planning
- ☐ How to buy a ticket or pass
- ☐ How to use ticket validators
- ☐ How to file a complaint
- ☐ Language interpretation services
- ☐ Translation of public documents
- ☐ How to make a reservation for an accessible vehicle
- ☐ Not sure
- ☐ Other (please specify): _____

11. How do you typically communicate with customers who speak limited or no English? (Select all that apply.)

- ☐ Direct them to RTD Customer Care
- ☐ Provide translated brochures
- ☐ Direct them to informational signage (i.e., diagrams, maps, etc.)
- ☐ Direct them to the RTD website
- ☐ Not sure
- ☐ Other (please specify): _____

12. In general, how would you describe your experiences communicating with customers who speak little or no English?

Four Factor Analysis: Factor 2

○ Very difficult   ○ Somewhat difficult   ○ Somewhat easy   ○ Very easy   ○ Not sure

13. Are you aware of any materials, services, or tools that RTD uses to communicate with customers who speak little or no English?

○ Yes   ○ No <mark>(SKIP TO QUESTION 15)</mark>   ○ Not sure <mark>(SKIP TO QUESTION 15)</mark>

14. What materials, services, or tools does RTD use to communicate with customers who speak little or no English? (Select all that apply.)

☐ RTD Customer Care   ☐ Channel cards in Spanish

☐ Translations through the RTD website   ☐ Other (please specify): _____

☐ Announcements in Spanish

15. What materials, services, or tools do you think RTD can use to improve communication with customers who speak little or no English?

[ ]

16. Do you speak another language fluently besides English?

○ Yes   ○ No <mark>(SKIP TO QUESTION 20)</mark>   ○ Not sure <mark>(SKIP TO QUESTION 20)</mark>

17. What other language(s) do you speak fluently besides English? (Select all that apply.)

☐ Spanish   ☐ Korean   ☐ Amharic   ☐ Japanese
☐ Vietnamese   ☐ Russian   ☐ Arabic   ☐ Other (please specify):
☐ Chinese   ☐ Nepali   ☐ French

_____

Four Factor Analysis: Factor 2

18. In general, about how often do you speak in another language with customers?

- ○ Everyday
- ○ Almost every day
- ○ A few times every week
- ○ Once every week
- ○ A few times every month
- ○ Once every month
- ○ Less than once every month
- ○ I don't speak in another language with customers (SKIP TO QUESTION 20)
- ○ Not sure

19. Which language other than English do you speak most often with customers? (Select one response.)

- ○ Spanish
- ○ Vietnamese
- ○ Chinese
- ○ Korean
- ○ Russian
- ○ Nepali
- ○ Amharic
- ○ Arabic
- ○ French
- ○ Japanese
- ○ Other (please specify):
- ○ _____

20. Do you feel equipped to communicate with customers who speak limited or no English?

- ○ Yes
- ○ No
- ○ Not sure

21. What else can RTD do to improve language assistance services for customers who speak little or no English?

22. Please enter your RTD employee number (This is the 5-digit number on your RTD badge.)

Thank you for completing this survey. We sincerely appreciate your time.

Factor 3: Nature and Importance of RTD Services to LEP Persons

Prepared by RTD Market Research | January 2022

Four Factor Analysis: Factor 3

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Background

In accordance with Title VI and the Federal Transit Administration's (FTA) policy guidance, transit agencies are required to establish, monitor and update their Language Access Plan (LAP) to mitigate language barriers that could prevent Limited English Proficient (LEP) persons from accessing agency programs and services.[1] The LAP is developed utilizing the U.S. Department of Transportation's (USDOT) LEP Guidance Handbook. The USDOT provides guidance to transit agencies receiving federal funding based upon the determination of need, using a Four Factor Analysis. This Analysis includes these criteria:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by an RTD program, activity or service.
2. The frequency with which LEP persons interact with RTD programs, activities or services.
3. The nature and importance of programs, activities or services provided by RTD to the LEP population.
4. The resources available to RTD and overall cost to provide language assistance.

Effective February 2021, the LAP research workgroup, made up of Transit Equity and Market Research staff, convened to initiate the update of RTD's Four Factor Analysis. To complete Factor 3, the LAP research workgroup conducted surveys with customers who are Limited English Proficient. RTD is committed to increasing its awareness of its interaction with LEP communities within the RTD service area through further focused market research. Consequently, RTD will conduct focus groups to obtain a more detailed perspective of large LEP populations in the 2022-2023 timeframe and consistently work with community organizations (and the LEP populations they serve) to evaluate which documents are "vital" to ensure meaningful access to RTD services and programs.

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[1] To view policy guidance, please see *Regulatory Background* in the Appendix.

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Four Factor Analysis: Factor 3

RTD

Core Research Questions

This research is designed to answer the following:

- How frequently do LEP customers interact with RTD?
- How do LEP customers receive RTD specific information, and how do they prefer to receive information?
- How useful are RTD's language assistance services?
- What is the importance of receiving RTD information in LEP customers' native language?
- How safe and secure do LEP customers feel?
- Are LEP customers aware of RTD's LiVE program?
- How do LEP customers perceive RTD's fare system?
- LEP customers' demographics

Methodology

RTD conducted the survey from September 7, 2021 through October 31, 2021. Surveys were distributed to LEP individuals via community-based organizations.[2] Due to lower-than-expected response rates, RTD created a social media campaign to target LEP individuals. The survey was offered in both a paper and online format.

The survey was translated into Amharic, Arabic, Chinese, English, French, Korean, Nepalese, Persian, Russian, Spanish and Vietnamese.[3]

The survey closed on October 31, 2021 with 206 responses, including 101 responses to the online version and 105 responses to the paper version. During data collection efforts, RTD collected responses from many individuals who do not classify as LEP. Their responses were analyzed for potential skews and were deemed too biased to be included in the analysis.

Executive Summary

- **About half of respondents are frequent riders, with most riding with the same frequency now as they did prior to the start of COVID-19.** 59% of respondents ride RTD once a week or more often. About half (51%) ride RTD the same frequency now as they did before COVID-19; 30% ride less often now and 17% ride more often.

- **Respondents predominantly receive information about RTD from the RTD website, signs at a bus or train stop, RTD Customer Service, family or friends and from signs on board RTD buses or trains.** The RTD website is the most common way respondents receive information about RTD (28%), followed by signs at a bus or train stop (25%), RTD Customer Service (21%), family or friends (19%) and signs on board RTD buses or trains (19%). Respondents prefer to receive information from the RTD website (32%), signs at a bus or train stop (32%) and RTD Customer Service (25%).

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[2] For a complete list of CBOs, please see Appendix.
[3] To view the count of responses per language, please see *Response Rates per Survey Translation* in the Appendix.

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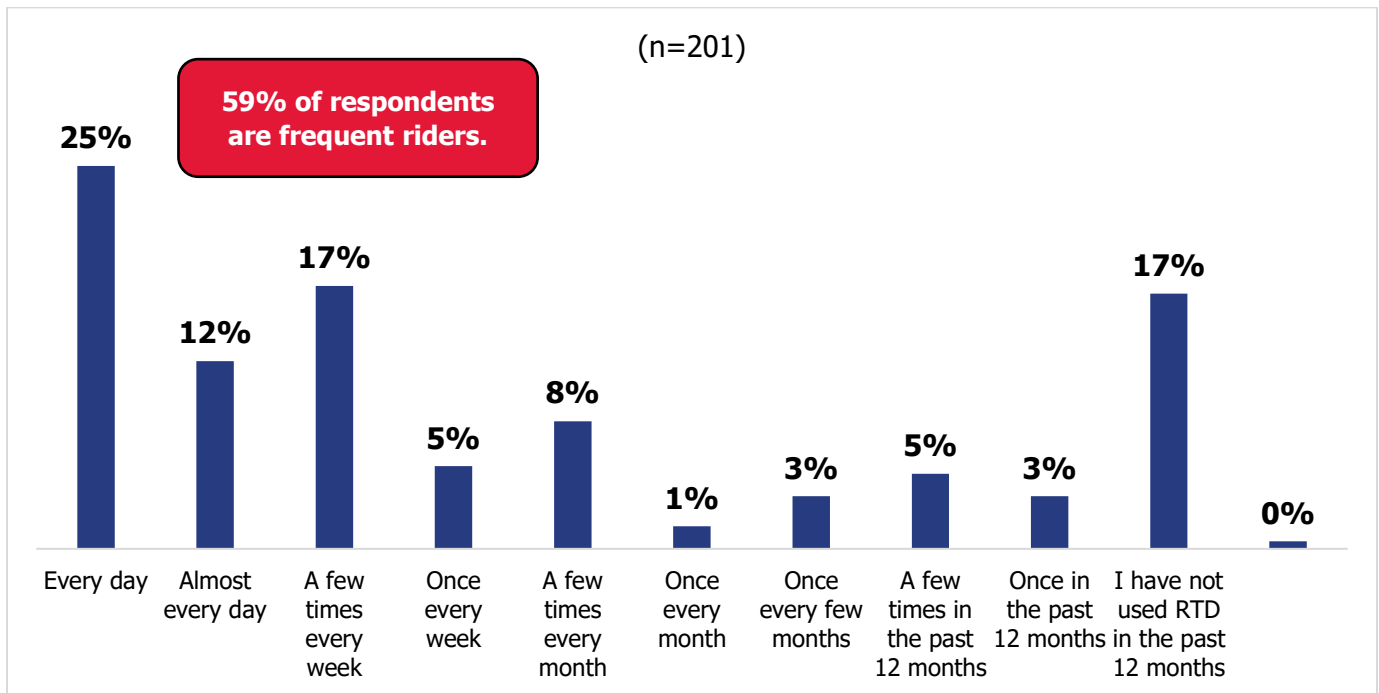
Four Factor Analysis: Factor 3

RTD

- **Respondents have mixed views on the usefulness of RTD's language assistance services.** Respondents were asked to rate how useful RTD's language assistance services are on a scale of 1 to 5, with 5 being "very useful." About half rated RTD Customer Care, translations through the website and announcements on the bus or train a 4 or 5.

- **About 2 in 3 respondents felt their security was at risk while riding RTD.** 65% of respondents state they have felt their security was at risk at one point while riding RTD. Most (69%) know how to follow emergency exit signs and about half (51%) know how to call RTD Customer Care during an emergency.

- **Most respondents do not use a discount pass.** 68% of respondents do not use a discount pass of any type. 68% do not know about RTD's LiVE program and only 12% receive fares through RTD's nonprofit reduced fares program.

- **Over half of respondents cite Spanish as their native language, followed by Vietnamese and Chinese.** 58% of respondents say their native language is Spanish, followed by Vietnamese (7%) and Chinese (6%). Few respondents state they read (13%), write (14%) or understand (14%) English "Not at all."

In-Depth Findings

RTD Usage

1 in 4 respondents ride RTD every day; 59% ride once a week or more. Most respondents (70%) have used RTD prior to COVID-19. Half of respondents state they ride RTD the same now as they did prior to COVID-19; about a third of respondents state they ride RTD less now than they did prior to COVID-19.

Figure 1. Frequency of Riding RTD

(n=201)

59% of respondents are frequent riders.

Category	Percentage
Every day	25%
Almost every day	12%
A few times every week	17%
Once every week	5%
A few times every month	8%
Once every month	1%
Once every few months	3%
A few times in the past 12 months	5%
Once in the past 12 months	3%
I have not used RTD in the past 12 months	17%
	0%

Figure 2. Used RTD Prior to COVID-19?

(n=201)

Legend: ■ Yes ■ Not sure ■ No

- 25% (No)
- 4% (Not sure)
- 70% (Yes)
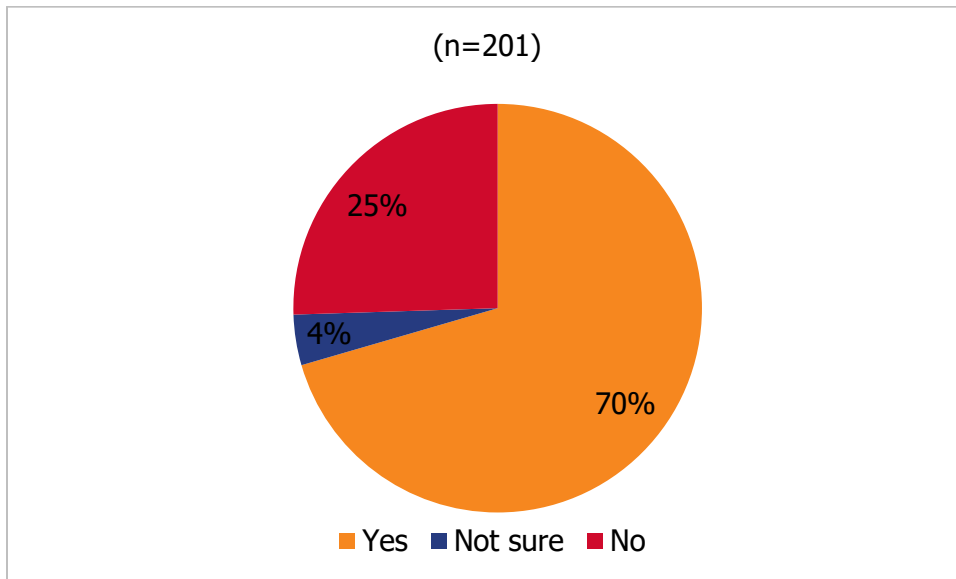
Figure 3. Change in Ridership Due to COVID-19

(n=144)

Category	Percentage
I ride RTD less often now than before the Covid-19 pandemic	30%
I ride RTD about the same now as before the Covid-19 pandemic	51%
I ride RTD more often now than before the Covid-19 pandemic	17%
Not applicable – I did not use RTD before Covid-19 spread in March 2020	6%
Not sure	4%
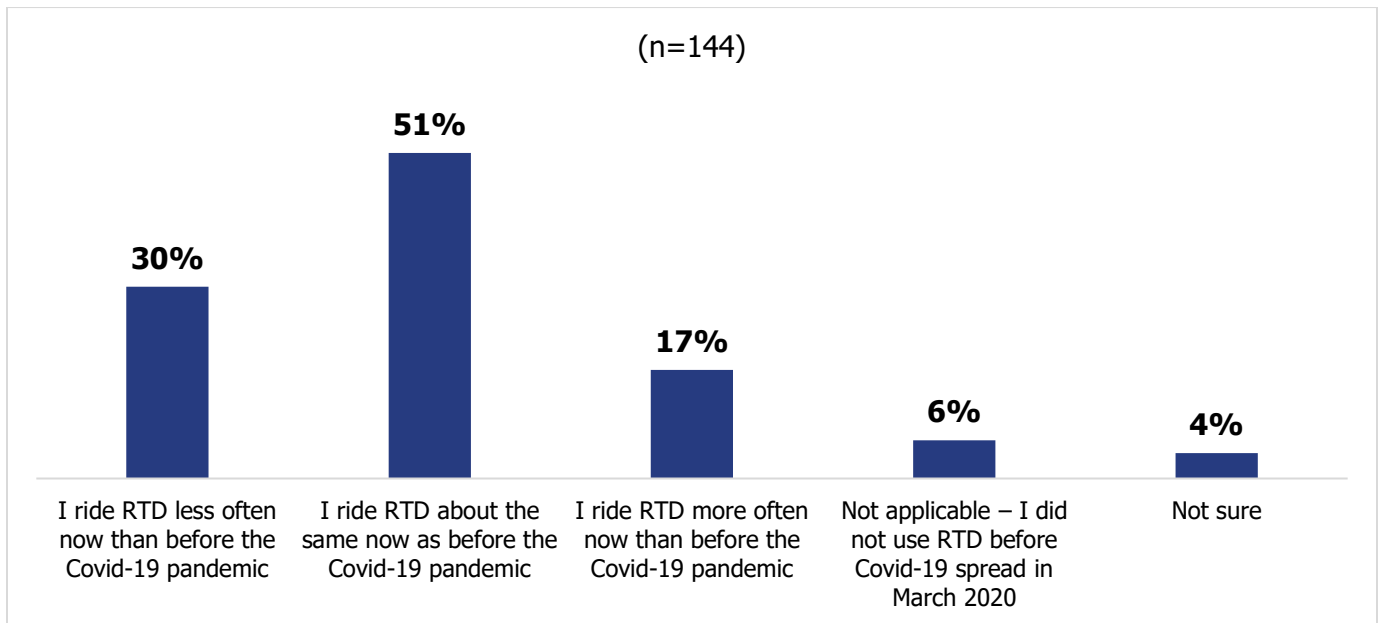
RTD Information

Respondents predominantly receive information about RTD from the RTD website, signs at a bus or train stop, RTD Customer Service, family or friends, and from signs on board RTD buses or trains.

Four Factor Analysis: Factor 3

Figure 4. How LEP Customers Get Information about RTD

(n=202)

Source	Percentage
RTD website	28%
Signs at a bus/train stop	25%
RTD Customer Service	21%
Family or friends	19%
Signs on board RTD bus/train	19%
From staff at a community-based organization	12%
RTD's social media accounts	7%
A translation application on a mobile device	6%
RTD sales outlet	6%
Local news program	6%
From RTD staff at a community event	5%
Local news website	4%
RTD employees	3%
Sending an email to RTD	3%
Local newspaper	2%
Brochures at community sites	2%
On the radio	1%
From staff at a faith-based organization	1%
Translation software on a computer	1%
I do not get information regarding RTD services	20%

Most LEP customers prefer to receive information about RTD from the RTD website, signs at bus or train stops, and from RTD Customer Service.

Four Factor Analysis: Factor 3

Figure 5. Preferred Method of Receiving Information about RTD

(n=202)

Method	Percent
RTD website	32%
Signs at a bus/train stop	32%
RTD Customer Service	25%
Signs on board RTD bus/train	19%
RTD's social media accounts	15%
From staff at a community-based organization	12%
Family or friends	11%
A translation application on a mobile device	11%
Sending an email to RTD	9%
Local news program	8%
RTD sales outlet	7%
Local news website	6%
Brochures at community sites	5%
Translation software on a computer	4%
RTD employees	3%
On the radio	3%
Local newspaper	3%
From staff at a faith-based organization	2%
From RTD staff at a community event	1%
I do not get information regarding RTD services	6%

Perceptions of RTD Language Services

Participants were asked to rate the importance of having translations available for a variety of information on a 5-point scale, where 5 means "very important." Figure 6 on page 9 shows the percent of participants who selected a 4 or 5 on the 5-point scale. How to buy a ticket and where the buses and trains go is the most important information participants want translated into their native language.

Four Factor Analysis: Factor 3

Figure 6. Importance of Having Translations Available
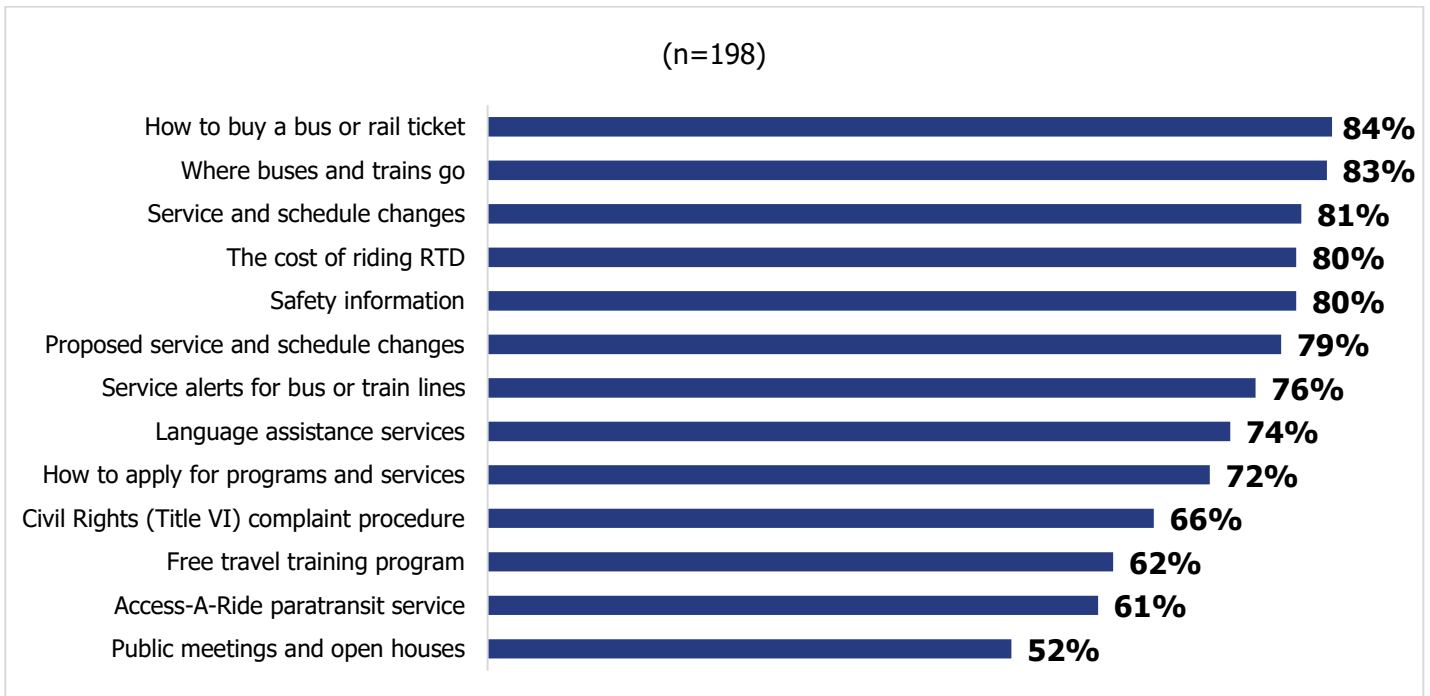
(n=198)

Category	Percent
How to buy a bus or rail ticket	84%
Where buses and trains go	83%
Service and schedule changes	81%
The cost of riding RTD	80%
Safety information	80%
Proposed service and schedule changes	79%
Service alerts for bus or train lines	76%
Language assistance services	74%
How to apply for programs and services	72%
Civil Rights (Title VI) complaint procedure	66%
Free travel training program	62%
Access-A-Ride paratransit service	61%
Public meetings and open houses	52%

Respondents were asked to rate how useful RTD's language assistance services are on a scale of 1 to 5, with 5 being "very useful." Figure 7 shows the percent of respondents who selected a 4 or 5. RTD Customer Care and translations through the RTD website are rated as the most useful language assistance services.

Figure 7. Usefulness of RTD Language Assistance Services

(n=199)

Category	Percent
RTD Customer Care	49%
Translations through the RTD website	47%
Announcements in Spanish on buses/trains	45%
Signs in Spanish on RTD vehicles or at stations/stops	43%
Channel cards (signs) in Spanish on buses/trains	39%
Civil Rights (Title VI) complaint procedure in Spanish on buses/trains	31%
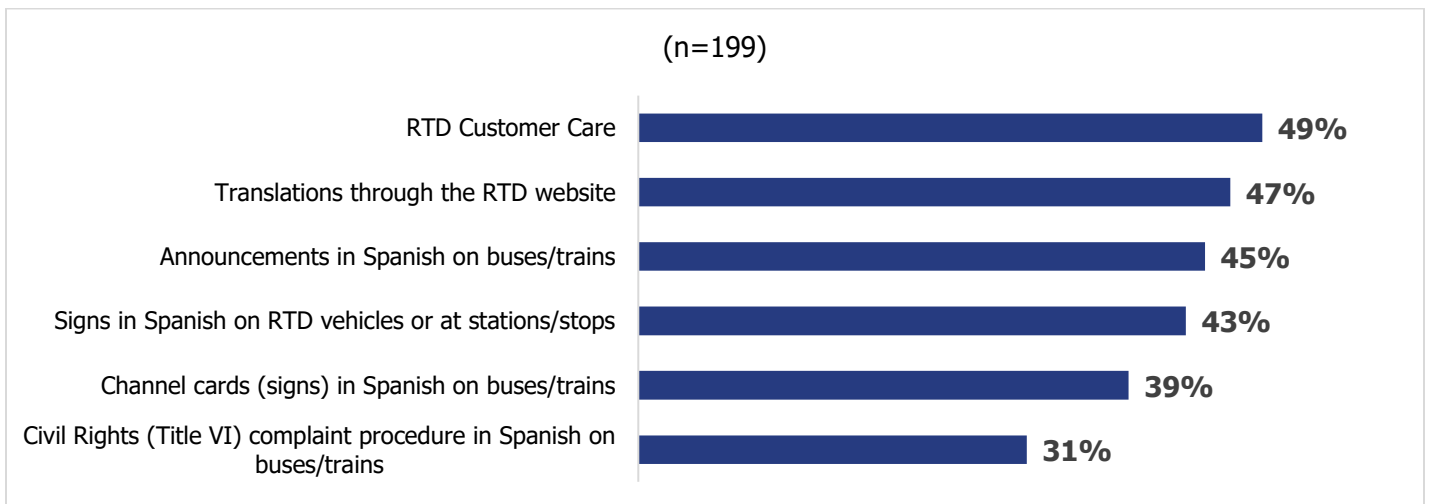
Four Factor Analysis: Factor 3

Perceptions of Security

2 in 3 respondents have felt their security was at risk while riding RTD at some point.

Figure 8. Feel Security is at Risk?

(n=200)

Feel security is at risk sometimes or more: 53%

Always	Most of the time	Sometimes	Rarely	Never	Not sure
7%	10%	34%	14%	21%	15%
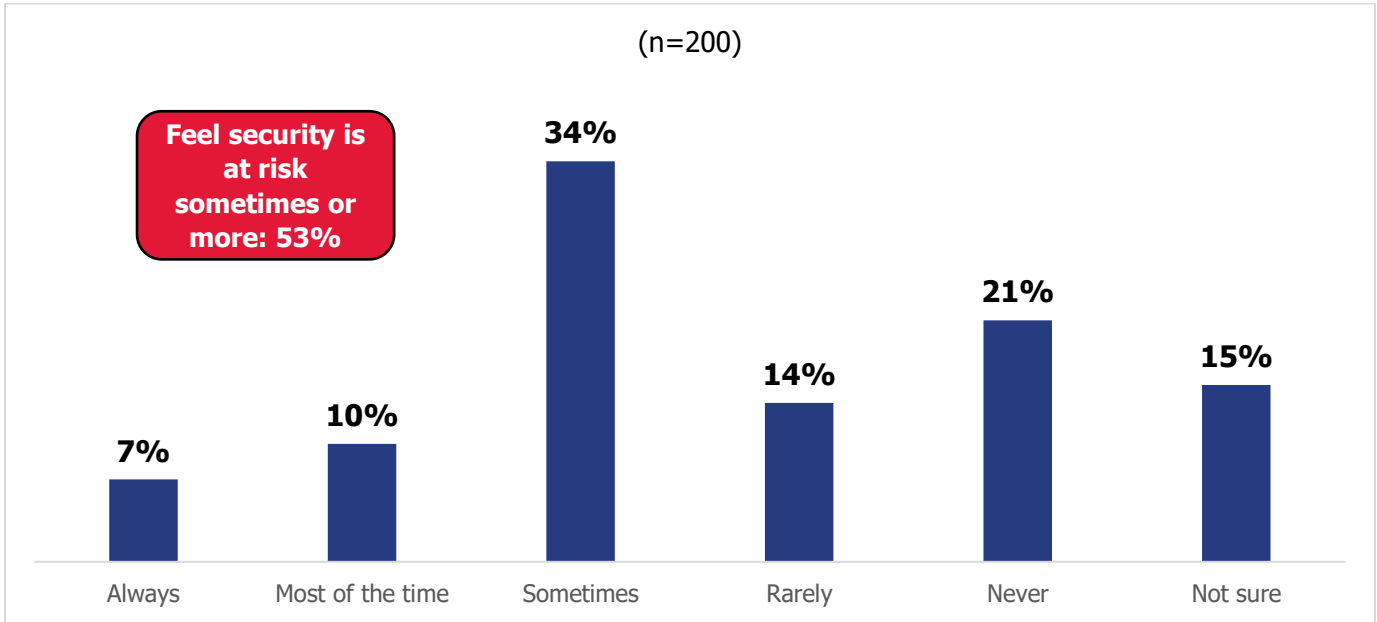
Figure 9 shows the percent of respondents that know how to do the following activities during an emergency. Most respondents (69%) know how to follow emergency exit instructions or call RTD Customer Service (51%); fewer know how to call RTD Police (35%), text Transit Watch (26%), or report an incident on the Transit Watch app (25%).

Figure 9. Know What to Do During an Emergency

(n=202)

Follow emergency exit instructions	Call RTD Customer Service	Call RTD Police at 303-299-2911	Text Transit Watch at 303-434-9100	Report a security incident on the RTD Transit Watch app
69%	51%	35%	26%	25%

Four Factor Analysis: Factor 3

RTD
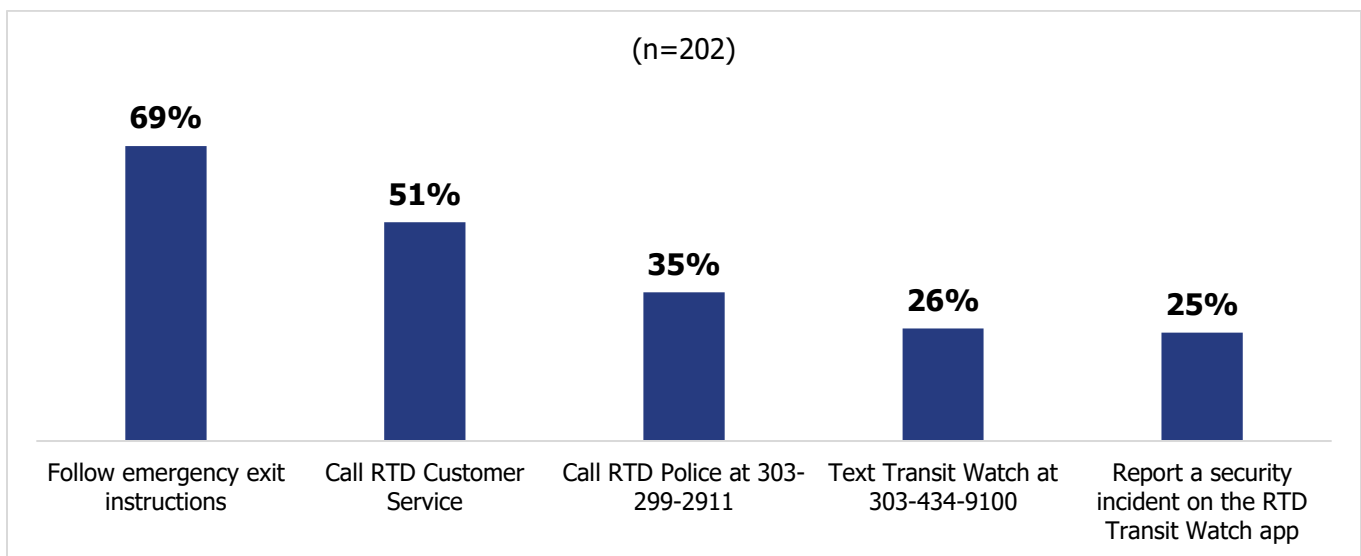
Discount Pass Usage

Most respondents (68%) are not aware of the LiVE program.

RTD asked respondents 3 follow-up questions regarding current enrollment in the LiVE program, knowledge of the eligibility requirements for the LiVE program, and knowledge of how to register for the LiVE program. The analysis of these questions is excluded from the report due to low base sizes (n=16-25).

Figure 10. Aware of LiVE Program?

(n=201)

- No
- Not sure
- Yes
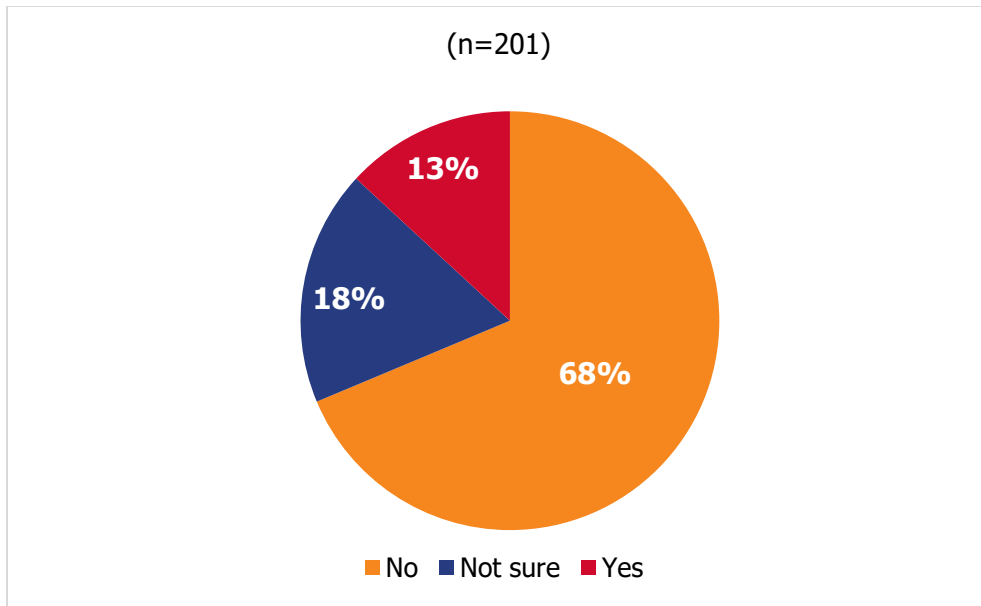
Most respondents (68%) do not use discount fare products from RTD. Of those using a discount pass, the Senior Pass is the most common discount pass used (15%) followed by the Youth Pass (8%). 1 in 10 respondents receive part of or all their fares through a non-profit or government agency.

Figure 11. Discount Pass Types Used

(n=202)

Senior (65+)	Youth (Ages 6-19, not CollegePass)	Individuals with Disabilities	Access-a-Ride card	LiVE	None of these
15%	8%	3%	3%	3%	68%
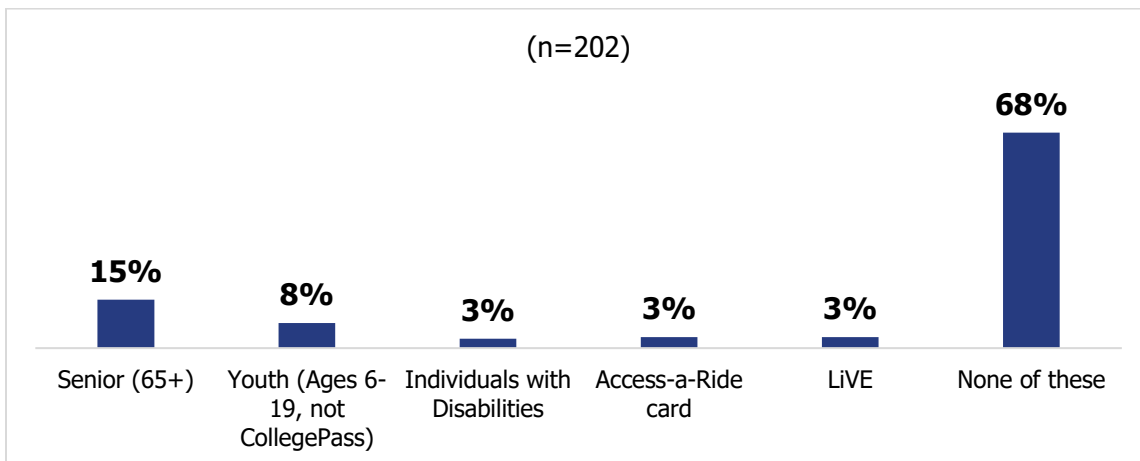
Four Factor Analysis: Factor 3

Figure 12. Receive Fares through RTD's Nonprofit Reduced Fare Program?

(n=199)

- ■ No
- ■ Yes, a nonprofit or government agency provides me with fares
- ■ Yes, I pay a nonprofit or government agency for all/part of my fares
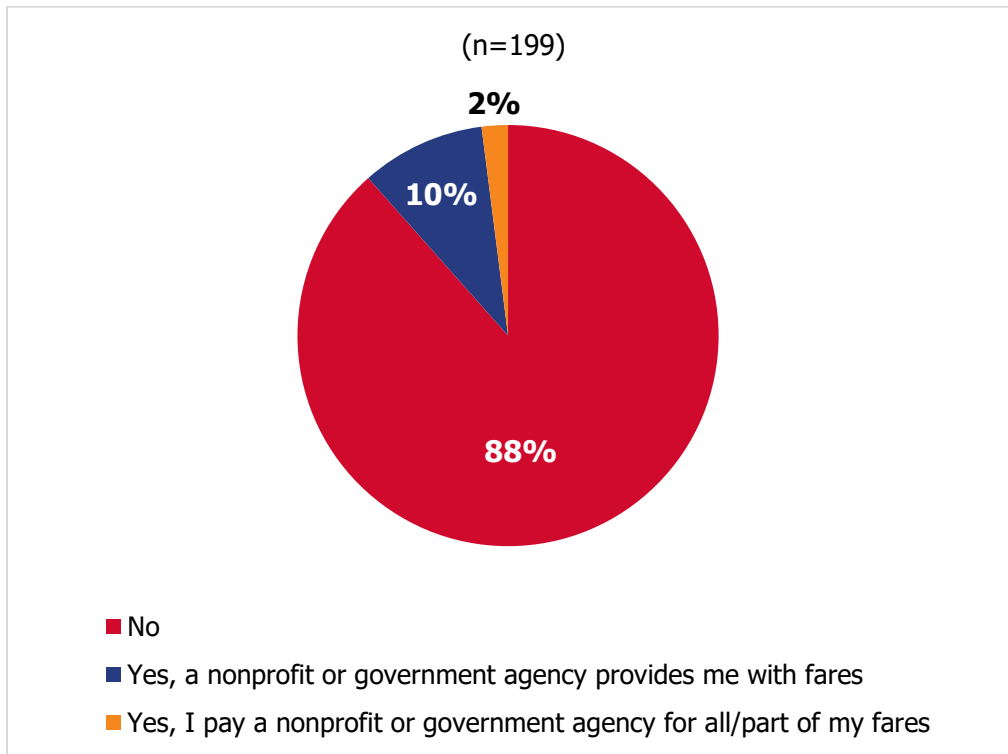
Fare Perceptions

Almost half of respondents (44%) are not familiar with RTD's fare structure. Of those who are aware of RTD's fare structure, many (41%) find the fare structure somewhat or very easy to understand.

Figure 13. Attitude towards RTD Fare Structure

(n=198)

RTD's fare structure is very difficult to understand.	RTD's fare structure is somewhat difficult to understand.	RTD's fare structure is somewhat easy to understand.	RTD's fare structure is very easy to understand.	Not applicable – I am unfamiliar with RTD's fare structure.
6%	9%	18%	23%	44%
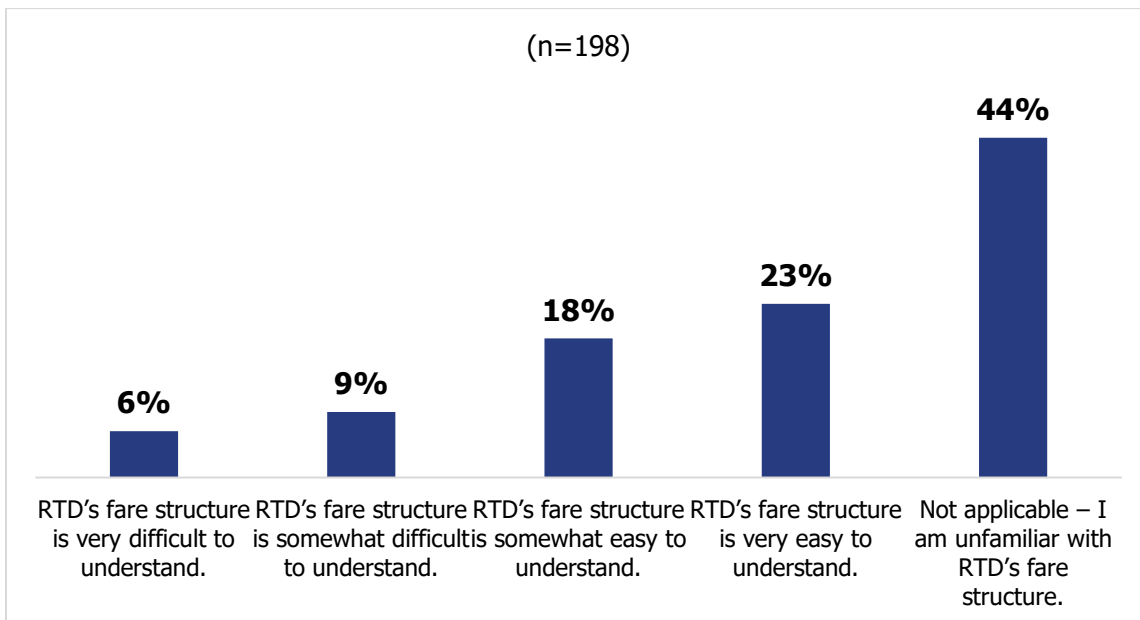
Four Factor Analysis: Factor 3

LEP Respondent Characteristics

Over half (58%) of respondents speak Spanish as their native language, followed by Vietnamese (7%), Chinese (6%) and Nepali (5%). Almost all respondents either read, write or understand English less than "Very well."

Figure 15. Native Language

(n=202)

Language	Percent
Spanish	58%
Vietnamese	7%
Chinese	6%
Nepali	5%
Russian	4%
Arabic	3%
French	3%
Korean	2%
Amharic	1%
Japanese	0%
Other	9%
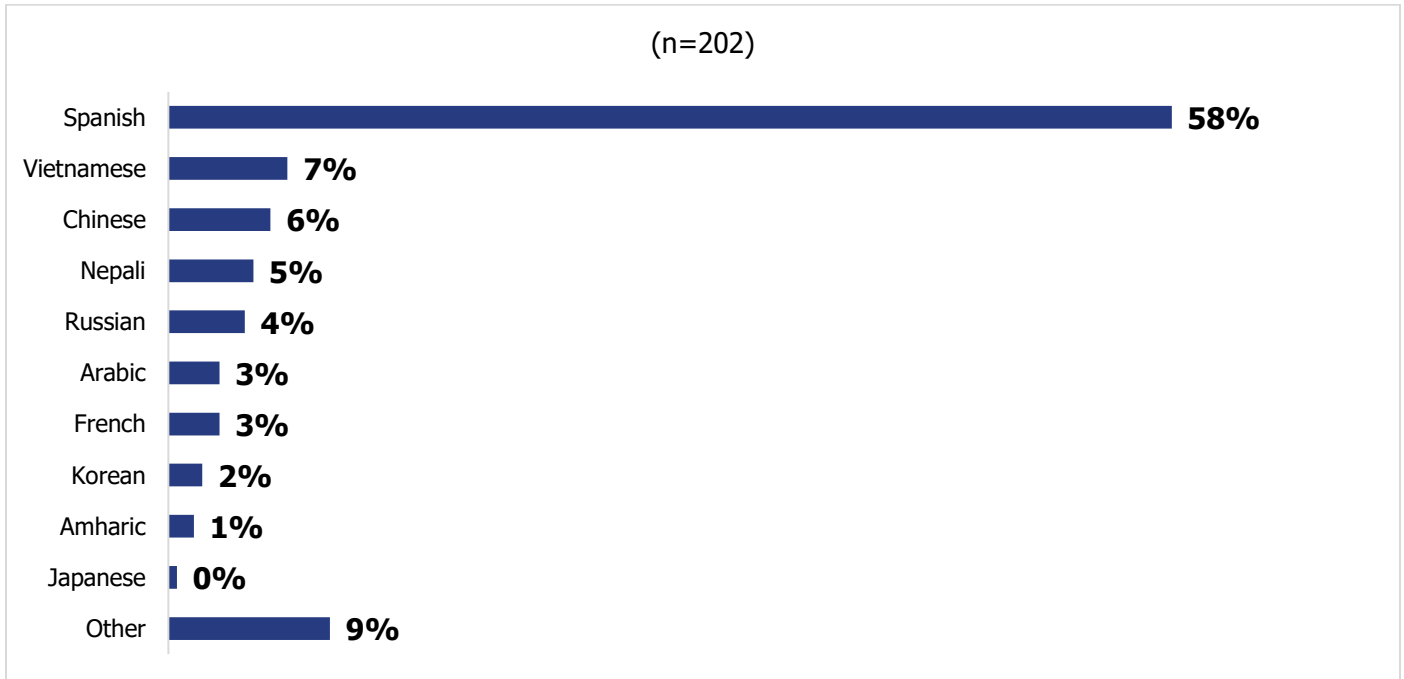
Figure 16. How Well Do You Read English?

(n=198)
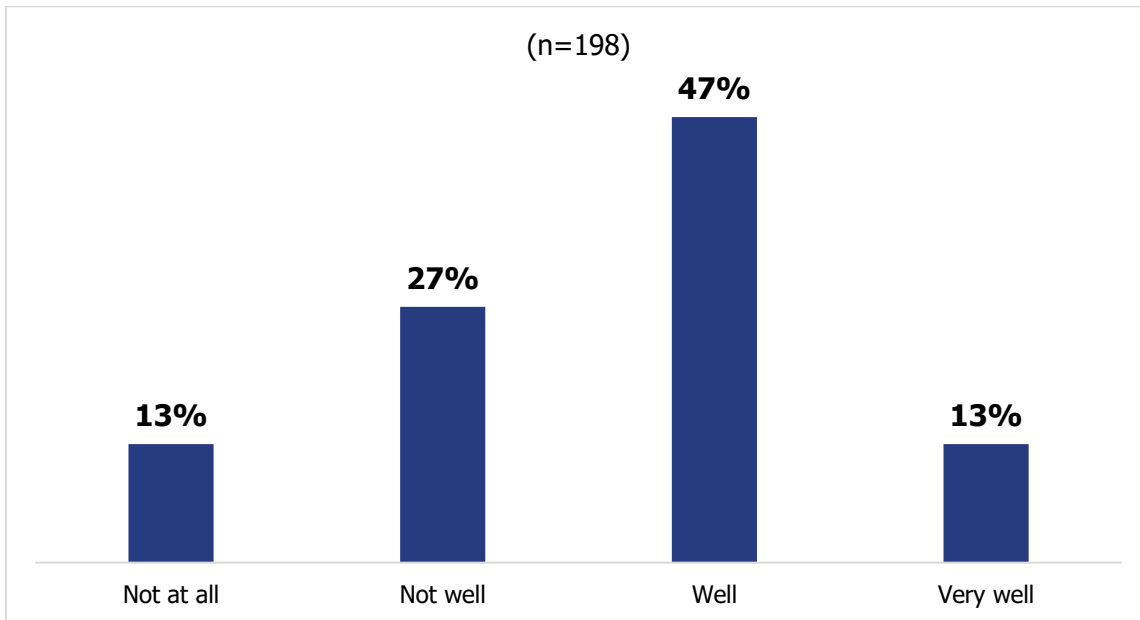
Not at all	Not well	Well	Very well
13%	27%	47%	13%

Figure 17. How Well Do You Write English?

(n=200)

Not at all	Not well	Well	Very well
14%	34%	42%	11%
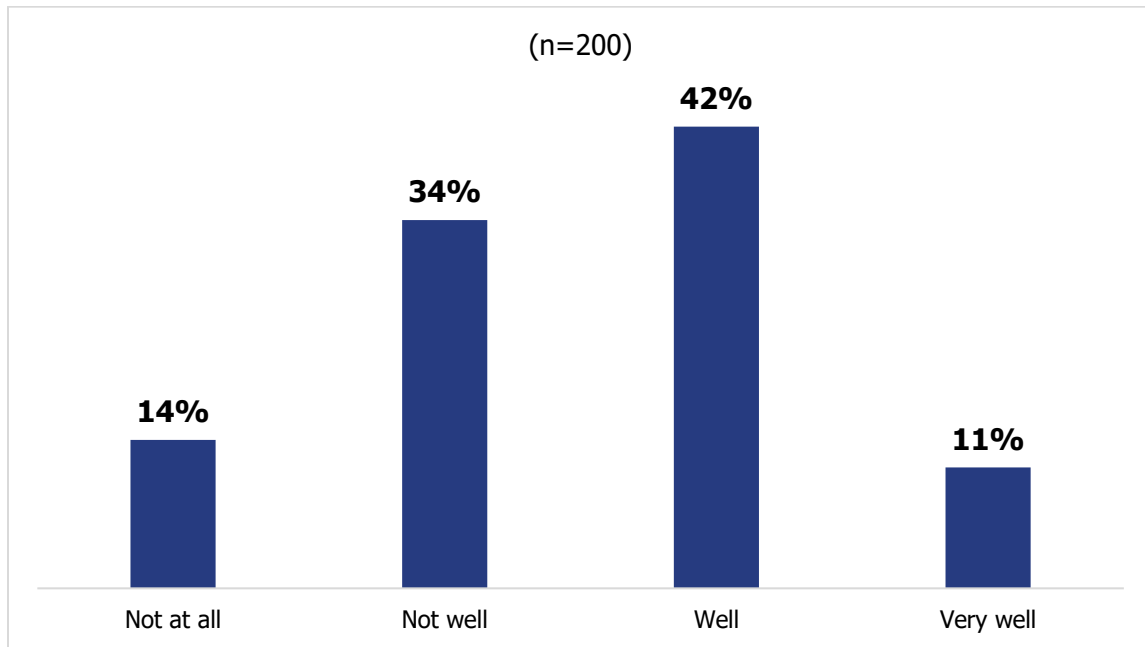
Figure 18. How Well Do You Understand English?

(n=199)

Not at all	Not well	Well	Very well
14%	26%	48%	12%
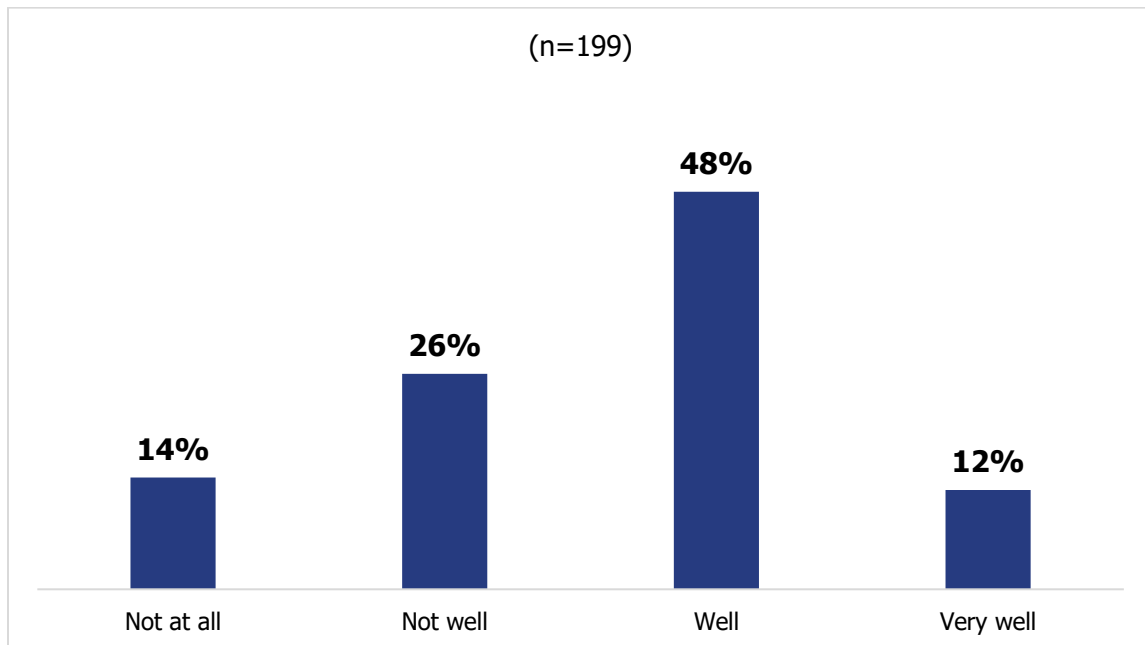
Respondent Demographics

The following figures detail respondent demographics. Please note that the survey was administered via a non-probability sample plan and therefore the demographics displayed on the following charts should not be used for any directional, informational or decision-making processes.

Figure 19. Gender

(n=201)

Female	Male	Non-binary or Gender non-conforming	Other
58%	38%	3%	1%

Figure 20. Age

(n=200)

18-24	25-34	35-44	45-54	55-64	65 or older
10%	22%	20%	20%	13%	16%
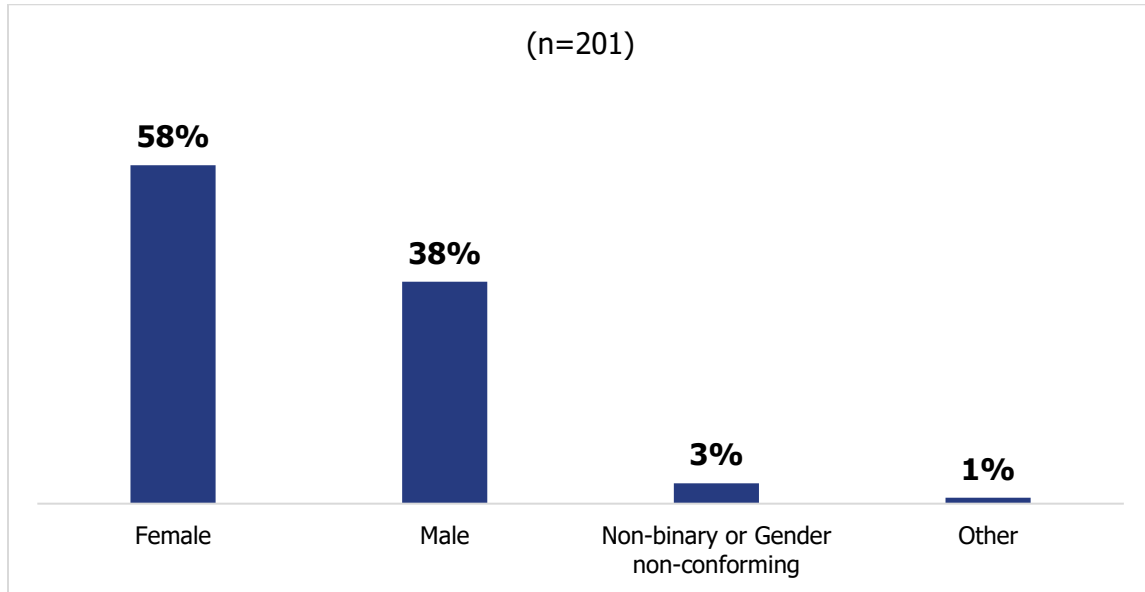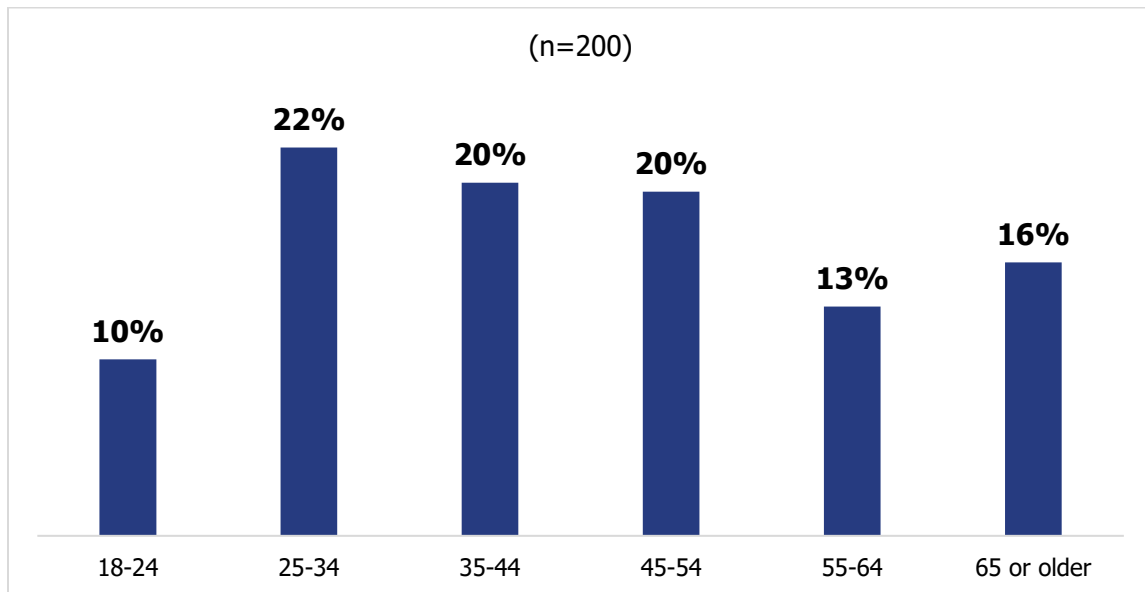
Figure 21. Hispanic, Latino, or Spanish Origin?

(n=200)

Category	Percentage
No	39%
Yes, Mexican, Mexican American, Chicano	44%
Yes, Puerto Rican	2%
Yes, Cuban	2%
Yes, Other (please specify)	14%

Figure 22. Ethnicity

(n=200)

Category	Percentage
American Indian or Alaska Native	3%
Asian	25%
Black or African American	11%
Native Hawaiian or Other Pacific Islander	2%
White	27%
Other	41%
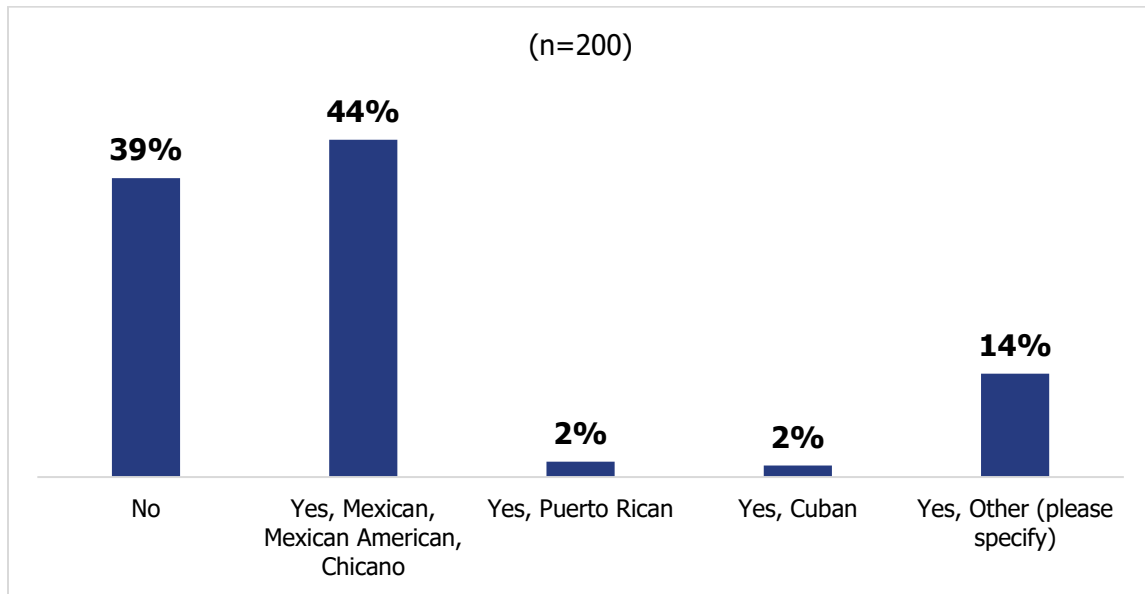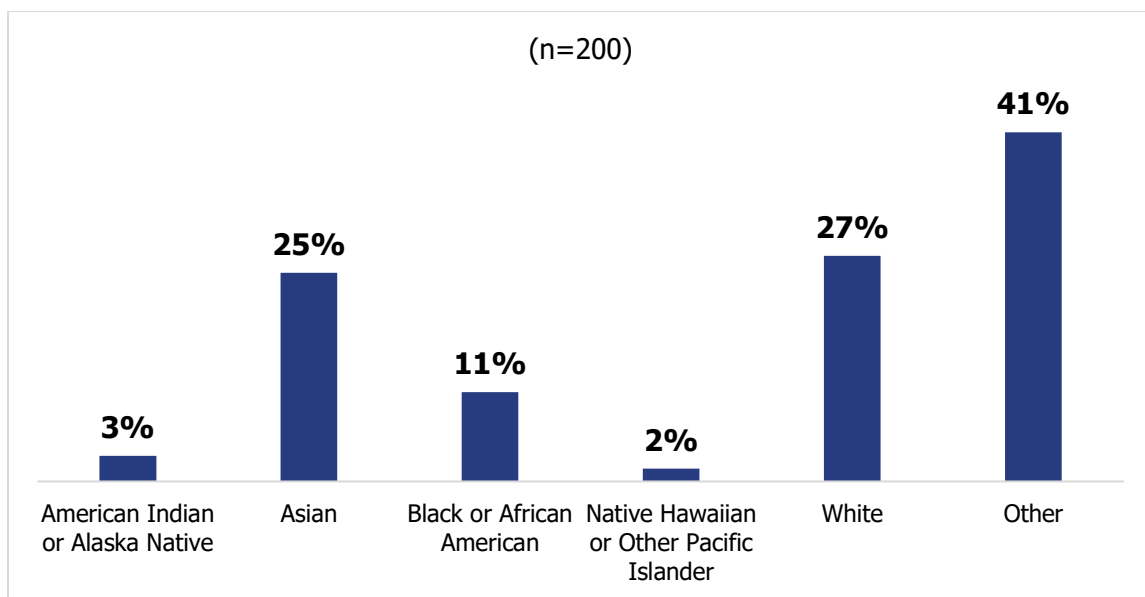
Four Factor Analysis: Factor 3

Figure 23. Low Income?

(n=181)

71% Low Income
29% Non-Low Income

■ Low Income ■ Non-Low Income
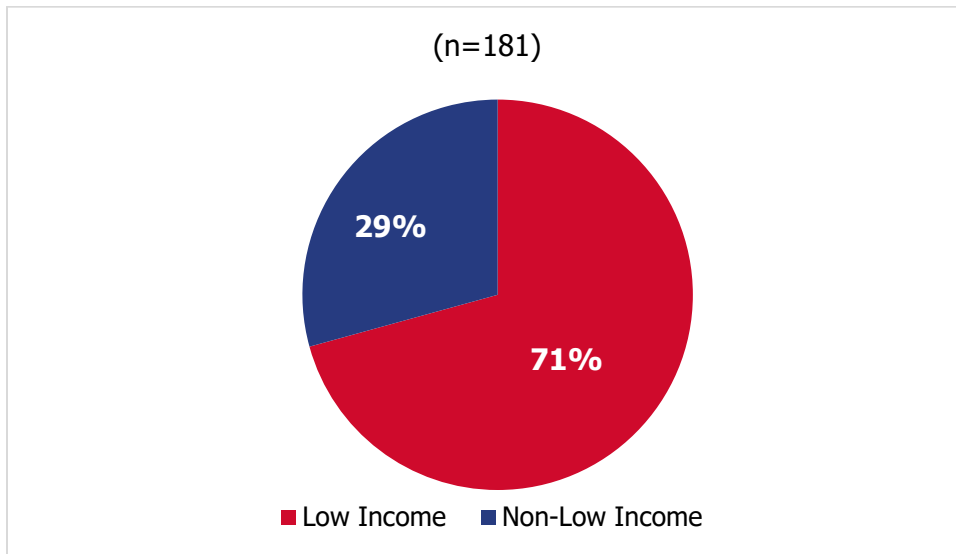
Figure 24. Have a Car in Household?

(n=202)

35% No
65% Yes

■ No ■ Yes
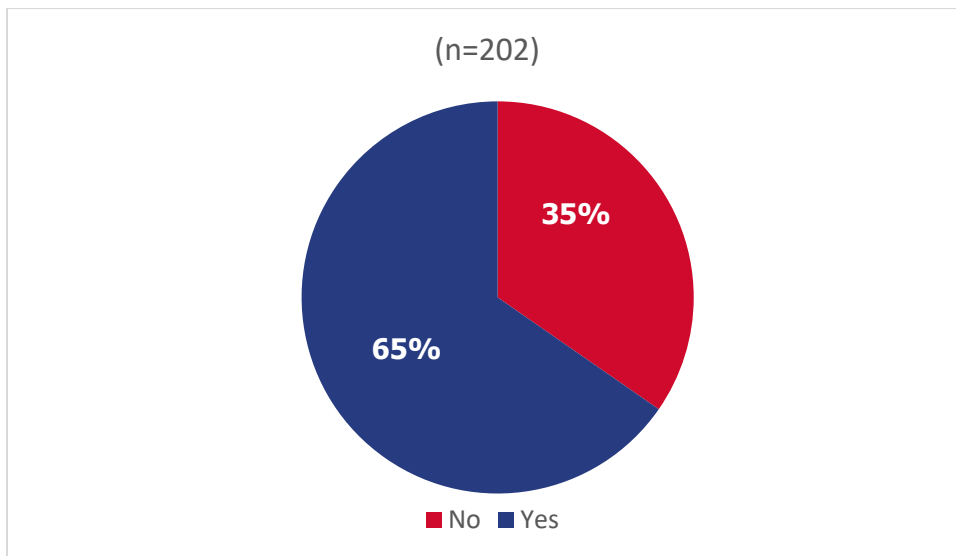
Four Factor Analysis: Factor 3

Figure 25. Number of Cars in Household

(n=131)

1	2	3	4 or more
56%	34%	8%	2%
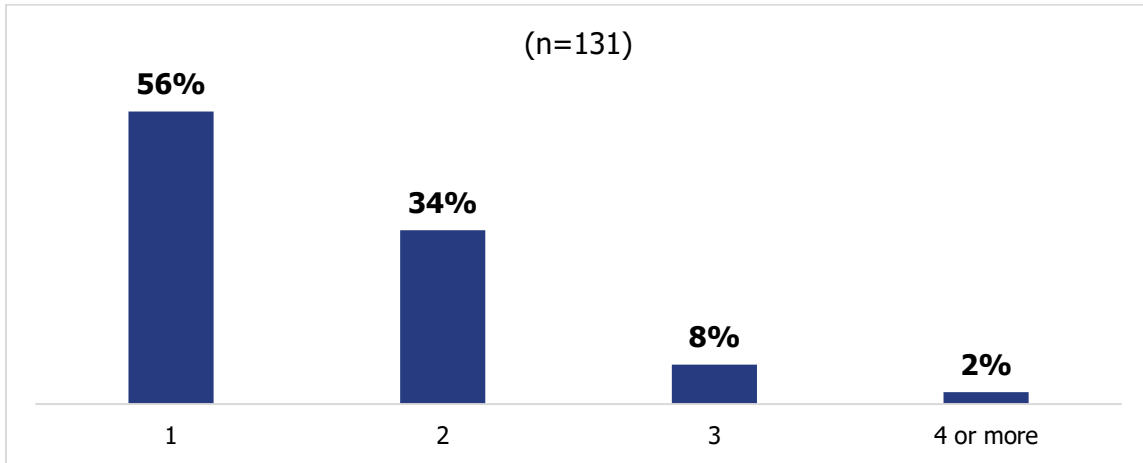
Four Factor Analysis: Factor 3

Appendix

Regulatory Background

1. <u>Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq</u>., and its implementing regulations provide 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 otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on persons with limited English proficiency (LEP) because such conduct constitutes national origin discrimination.

2. <u>Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" reprinted at 65 FR 50121 (August 16, 2000),</u> directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

List of Community-Based Organizations (CBOs) Recruited From

CBOs	
Asian Pacific Development Center	Persian Cultural Circle Group
Athletics and Beyond	Servicios de La Raza, Inc.
Denver Health Refugee Health Clinic (Lowry Center and Northeast Locations)	Sharing and Caring
Emily Griffith Opportunity School	St. Francis Center
Focus Points	Village Exchange
Mile High Connects	Warren Village
Montbello High School	Womens Bean Project

Response Rates per Survey Translation

Language	Count of Responses
Spanish	95
English	68
Chinese	12
Vietnamese	12
Russian	6
Persian	4
Arabic	3
Korean	3
Nepalese	3

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RTD

Survey Instrument

Language Access Customer Engagement Survey

Thank you for taking time to provide feedback. RTD's Civil Rights Division is conducting this survey with customers to understand their experiences and to ensure meaningful access to RTD's programs and services. There are no right or wrong answers; we simply want your opinion. The results of this survey will help RTD understand how we can better serve our customers.

We anticipate this survey will take about 20 minutes to complete. All responses are completely confidential, and data will be reported in group form only. **Should you have any questions or if you would like to complete the survey in your native language, please contact RTD Customer Care at 303-299-6000.**

Please complete this survey by Sunday, October 31. If you prefer to complete this survey online, please visit this link: www.surveymonkey.com/r/LACEsurvey.

Thank you for taking time to provide feedback in this important survey.

Carl Green Jr.,
Transit Equity Manager
Civil Rights Division

1. **About how often have you used RTD services in the past 12 months?**
   - ○ Every day
   - ○ Almost every day
   - ○ A few times every week
   - ○ Once every week
   - ○ A few times every month
   - ○ Once every month
   - ○ Once every few months
   - ○ A few times in the past 12 months
   - ○ Once in the past 12 months
   - ○ **I have not used RTD in the past 12 months**
   - ○ Not sure

2. **Did you use RTD services prior to the spread of the COVID-19 pandemic in March 2020, even if only once?**
   - ○ Yes
   - ○ No **(SKIP TO QUESTION 4)**
   - ○ Not sure **(SKIP TO QUESTION 4)**

3. **Thinking about your use of RTD before the spread of COVID-19 pandemic in March 2020, do you use RTD more, less, or about the same??**
   - ○ I ride RTD <u>less</u> often now than before the COVID-19 pandemic
   - ○ I ride RTD <u>about the same</u> now as before the COVID-19 pandemic
   - ○ I ride RTD <u>more</u> often now than before the COVID-19 pandemic
   - ○ Not applicable – I did not use RTD before COVID-19 spread in March 2020

○ Not sure

4. **How do you currently get information about RTD's services? (Check all that apply.)**
   ○ RTD Customer Service
   ○ RTD employees
   ○ RTD website
   ○ At an RTD Sales Outlet
   ○ Sending an email to RTD
   ○ RTD's social media accounts (e.g., Facebook, Twitter, Instagram)
   ○ Signs at bus/train stops
   ○ Signs on board RTD buses/trains
   ○ On the radio
   ○ Local news program
   ○ Local news website
   ○ Local newspaper
   ○ Brochures at community sites
   ○ From RTD staff at a community event
   ○ Family or friends
   ○ From staff at a faith-based organization
   ○ From staff at a community-based organization/public agency
   ○ A translation application on your mobile device
   ○ Translation software on your computer
   ○ **I do not get information regarding RTD's services**
   ☐ Other (please specify): _____

5. **Please select the <u>TOP THREE</u> ways you prefer to get information about RTD's services? (Select up to 3.)**
   ○ RTD Customer Service
   ○ RTD employees
   ○ RTD website
   ○ At an RTD Sales Outlet
   ○ Sending an email to RTD
   ○ RTD's social media accounts (e.g., Facebook, Twitter, Instagram)
   ○ Signs at bus/train stops
   ○ Signs on board RTD buses/trains
   ○ On the radio
   ○ Local news program
   ○ Local news website
   ○ Local newspaper
   ○ Brochures at community sites
   ○ From RTD staff at a community event
   ○ Family or friends

○ From staff at a faith-based organization
○ From staff at a community-based organization/public agency
○ A translation application on your mobile device
○ Translation software on your computer
○ **I do not want to receive information about RTD's services**
☐ Other (please specify) _____

6. **Please rate how useful the following language assistance services are on a scale of 1 to 5, where 1 indicates *Not at all useful* and 5 indicates *Very useful*. If you are not aware of a service, please select "Not aware of this service."**

	1 – Not at all useful	2	3	4	5 – Very useful	Not sure	Not aware of this service
RTD Customer Care	○	○	○	○	○	○	○
Translations through the RTD website	○	○	○	○	○	○	○
Announcements in Spanish on buses/trains	○	○	○	○	○	○	○
Channel cards (signs) in Spanish on buses/trains	○	○	○	○	○	○	○
Signs in Spanish on RTD vehicles or at stations/stops	○	○	○	○	○	○	○
Civil Rights (Title VI) complaint procedure in Spanish on buses/trains	○	○	○	○	○	○	○

7. **Please rate how important it is to be able to get information about each of the following from RTD in your native language on a scale from 1 to 5, where 1 indicates *Not at all important* and 5 indicates *Very important*.**

	1 – Not at all important	2	3	4	5 – Very important	Not sure
The cost of riding RTD	○	○	○	○	○	○
How to buy a bus or rail ticket	○	○	○	○	○	○
Where buses and trains go	○	○	○	○	○	○
Service and schedule changes	○	○	○	○	○	○
Proposed service and schedule changes	○	○	○	○	○	○
Service alerts for bus or train lines	○	○	○	○	○	○
Safety information	○	○	○	○	○	○

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Public meetings and open houses	○	○	○	○	○	○
How to apply for programs and services	○	○	○	○	○	○
Civil Rights (Title VI) complaint procedure	○	○	○	○	○	○
Free travel training program	○	○	○	○	○	○
Language assistance services	○	○	○	○	○	○
Access-A-Ride paratransit service	○	○	○	○	○	○

8. **About how often do you feel like your personal security is at risk while riding RTD services?**

Never	Sometimes	Rarely	Most of the time	Always	Not sure
○	○	○	○	○	○

9. **Do you know how to do the following during an emergency when riding RTD or at a RTD bus stop/rail station?**

	Yes	No	Not sure
Report a security incident on the RTD Transit Watch app	○	○	○
Call RTD Police at 303-299-2911	○	○	○
Call RTD Customer Service	○	○	○
Text Transit Watch at 303-434-9100	○	○	○
Follow emergency exit instructions	○	○	○

10. **Are you aware of RTD's LiVE Program which provides eligible low-income customers with a 40% discount off regular RTD fares?**
    - ○ Yes
    - ○ No **(SKIP TO QUESTION 14)**
    - ○ Not sure **(SKIP TO QUESTION 14)**

11. **Are you currently enrolled in RTD's LiVE Program?**
    - ○ Yes **(SKIP TO QUESTION 14)**
    - ○ No
    - ○ Not sure

12. **Do you know the income eligibility requirements for RTD's LiVE Program?**
    - ○ Yes
    - ○ No
    - ○ Not sure

13. **Do you know how to register for RTD's LiVE Program?**
- ○ Yes
- ○ No
- ○ Not sure

14. **Which of the following discounts, if any, have you used in the past 12 months when riding RTD?**
- ○ Senior (65+)
- ○ Individuals with Disabilities
- ○ Youth (Ages 6-19, not CollegePass)
- ○ Access-a-Ride card
- ○ LiVE
- ○ None of these

15. **Do you currently receive your fares through RTD's Nonprofit Reduced Fare program?**
- ○ Yes, a nonprofit or government agency provides me with fares
- ○ Yes, I pay a nonprofit or government agency for all/part of my fares
- ○ No

16. **Which of the following best describes your attitudes toward RTD's fare structure?**
- ○ RTD's fare structure is very easy to understand.
- ○ RTD's fare structure is somewhat easy to understand.
- ○ RTD's fare structure is somewhat difficult to understand.
- ○ RTD's fare structure is very difficult to understand.
- ○ Not applicable – I am unfamiliar with RTD's fare structure.

17. **Please explain why you selected the response above.**

18. **What is your native language?**
- ○ English
- ○ Español (Spanish)
- ○ Tiếng Việt (Vietnamese)
- ○ 中文 (Chinese)

- ○ 한국어 (Korean)
- ○ Русский (Russian)
- ○ नेपाली (Nepali)
- ○ አማርኛ (Amharic)
- ○ عربى (Arabic)
- ○ Français (French)
- ○ 日本語 (Japanese)
- ○ Other (please specify): _____

19. How well do you do each of the following?

	Not at all	Not well	Well	Very well
Read English	○	○	○	○
Write English	○	○	○	○
Understand English	○	○	○	○

20. Including yourself, how many people live in your household? (Please write a number.)
Number: _____

21. Which of the following categories contains your annual household income, before taxes?

- ○ Up to $9,999
- ○ $10,000 to $19,999
- ○ $20,000 to $29,999
- ○ $30,000 to $39,999
- ○ $40,000 to $49,999
- ○ $50,000 to $59,999
- ○ $60,000 to $69,999
- ○ $70,000 to $79,999
- ○ $80,000 to $89,999
- ○ $90,000 to $99,999
- ○ $100,000 or more

22. Do you have a working vehicle (car, truck, van, or motorcycle) at home for use by members of your household?

- ○ Yes
- ○ No **(SKIP TO QUESTION 24)**

23. How many working vehicles do you have access to at your household?

- ○ 1
- ○ 2
- ○ 3
- ○ 4 or more

24. With which of the following do you most closely identify?

- ○ Male
- ○ Female
- ○ Non-binary or gender non-conforming
- ○ Other (please specify): _____

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25. Which of the following categories contains your age?

- ○ Under 18
- ○ 18-24
- ○ 25-34
- ○ 35-44
- ○ 45-54
- ○ 55-64
- ○ 65 or older

26. Are you of Hispanic, Latino, or Spanish origin?

- ○ No
- ○ Yes, Mexican, Mexican American, Chicano
- ○ Yes, Puerto Rican
- ○ Yes, Cuban
- ○ Yes, Other (Please specify) _____

27. Which of the following best describes your race? (Select all that apply.)

- ☐ American Indian or Alaska Native
- ☐ Asian
- ☐ Black or African American
- ☐ Native Hawaiian or Other Pacific Islander
- ☐ White
- ☐ Other (Please specify) _____

28. What is your zip code?

☐

**Thank you for completing this survey. We sincerely appreciate your time.
Please return your survey using the postage-paid envelope you received with this survey. Please send to RTD at 1660 Blake Street BLK-21 Denver, CO 80202.**

Factor 4: Available Resources and Costs of Providing Language Assistance Services Report

Prepared by RTD Transit Equity | February 2022

rtd-denver.com

Four Factor Analysis: Factor 4

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Four Factor Analysis: Factor 4

RTD

Background

In accordance with Title VI and the Federal Transit Administration's (FTA) policy guidance, transit agencies are required to establish, monitor and update their Language Access Plan (LAP) to mitigate language barriers that could prevent Limited English Proficient (LEP) persons from accessing agency programs and services.[1] The LAP is developed utilizing the U.S. Department of Transportation's (USDOT) LEP Guidance Handbook. The USDOT provides guidance to transit agencies receiving federal funding based upon the determination of need, using a Four Factor Analysis. This Analysis includes these criteria:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by an RTD program, activity or service.
2. The frequency with which LEP persons interact with RTD programs, activities or services.
3. The nature and importance of programs, activities or services provided by RTD to the LEP population.
4. The resources available to RTD and overall cost to provide language assistance.

Effective February 2021, the LAP research workgroup, made up of Transit Equity and Market Research staff, convened to initiate the update of RTD's Four Factor Analysis. To complete Factor 4, the LAP research workgroup assessed the resources available for LEP assistance, the cost of providing those resources, and awareness of our staff of these resources.

Resources and Costs

RTD reviewed the language assistance services it has provided since the last Four Factor Analysis in 2019 and the associated costs for each. Costs are shown in Figure 1.

Figure 1. LAP Spending Since Last Update June 2019-May 2022

Item	Total
Telephone Interpretation	$632
In-Person Interpretation	$130
Brochures/Literature Translation	$7,412
Brochures/Literature Printing Bilingual English/Spanish	$36,000
Customer Surveys	$722
Vehicle Signage Printing Bilingual English/Spanish	$67,000
Vehicle Signage	$2,400
Channel Cards (Vehicle Interiors in Spanish)	$2,000
Newspaper, Digital and Social Media Advertising	$50,000
Civil Rights Title VI Activities	$10,022
Total	$176,318

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[1] To view policy guidance, please see *Regulatory Background* in the Appendix.

Four Factor Analysis: Factor 4

RTD provides a variety of resources to support the needs of LEP customers. Telephone interpretation for over 200 languages is available upon request when customers call RTD customer service. In-person interpretation is provided upon request for community engagement activities and public meetings.

RTD is revising a basic information webpage so LEP persons can access vital documents such as pass programs, fare payment information, service changes, and safety and security information. RTD is also in the process of creating "How to Ride" guides which will explain how to utilize RTD's services in a step-by-step manner. The guides will be created in multiple languages and available to the public to ensure meaningful access by LEP persons. Additionally, RTD is currently in the process of developing training, tools and resources for frontline staff.

In all, the cost of providing these resources is approximately $176,318 since June 2019, with the largest portion coming from vehicle signage in Spanish. With document translation, costs incurred include both the translation and additional production of printed materials. RTD also commonly advertises in non-English newspapers to reach LEP persons.

What is not accounted for in Figure 1 is the staff costs incurred in working to provide access to LEP persons. Various staff from Communications, Bus and Rail Operations, Access-a-Ride, Planning, Service Planning and Transit Equity are often involved in these efforts, as RTD strives to find creative ways to address the diverse customer base it serves – especially LEP customers. Many staff have skills that serve as a non-quantifiable resource for LEP customers. Of the 614 staff surveyed, 62% indicated that they spoke Spanish. Additionally, half of the customer information specialists (18 total) are bilingual to assist Spanish-speaking customers.

Important notes during the global COVID-19 pandemic:

> • **Printing** – During the pandemic, printing was extremely limited. All major updates were published through RTD's website, supported by social media, Transit Management Organizations and community partners. PDFs were made available of certain materials on request and often in Spanish.

> • **On-vehicle signage** – During the pandemic, we placed bilingual decals about masks, fares and social distancing on our vehicles and at stations. While translation is included above, printing is not, as this was completed by RTD's Sign Shop as an absorbed cost of doing business.

Awareness of Resources and Costs

When staff were asked if they were aware of any materials, services or tools that RTD uses to communicate with LEP customers, only 54% said they were. The most common service mentioned was RTD Customer Care telephone language interpretation, followed by the RTD website and announcements in Spanish. Thirty-five percent of staff said they felt equipped to communicate with LEP customers, whereas 43% noted they did not feel equipped to communicated with LEP customers.

Equally as important in understanding staff awareness of resources are LEP customers' awareness of RTD's services for non-English language services. Figure 2 illustrates the level of usefulness for LEP populations. The highest percentage of usefulness is "RTD Customer Care" at 49% followed by "translations through the RTD website" at 47%.

Figure 2. Usefulness of RTD Language Assistance Services

Service	Percentage
RTD Customer Care	49%
Translations through the RTD website	47%
Announcements in Spanish on buses/trains	45%
Signs in Spanish on RTD vehicles or at stations/stops	43%
Channel cards (signs) in Spanish on buses/trains	39%
Civil Rights (Title VI) complaint procedure in Spanish on buses/trains	31%