

2022 TITLE VI Program Update

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





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Executive Summary

Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD's) functional mission to provide public transit service within the Denver region. An equitable mass transit system distributes the benefits and adverse effects of transit service fairly without regard for race, color, national origin, or low-income status. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order (EO) 12898 pertaining to environmental justice (EJ).

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

In 1994, President Clinton issued EO 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

The intent of Title VI is to remove barriers and conditions that prevent minority and low-income persons as well as persons with limited English proficiency (LEP) from equal access to public goods and services. In effect, Title VI promotes fairness and equity in federally assisted programs and activities. Title VI is rooted in the Constitutional guarantee that all human beings are entitled to equal protection of the law, and specifically addresses involvement of impacted persons in the decision-making process.

There are many forms of unlawful discrimination based on race, color or national origin that can limit the opportunity of underrepresented communities to gain equal access to services and programs. In operating a federally assisted program,¹ a recipient cannot, on the basis of race, color or national origin, either directly or through contractual means cannot do the following:

- Deny program services, aids or benefits;
- Provide a different service, aid or benefit, or provide them in a manner different than they are provided to others;
- Omit participation and access by LEP persons; or
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid or benefit.

The Federal Transit Administration's (FTA's) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Environmental Justice (EJ). In this circular, the FTA requires that RTD document measures taken to comply with the U.S. Department of Transportation's (USDOT's) Title VI regulations by submitting a Title VI program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA.

¹ The Civil Rights Restoration Act of 1987 amended each of the affected statutes by adding a section defining the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives federal financial assistance.

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In this Title VI Program Update, the RTD Transit Equity Office under the Civil Rights Division has compiled a documentation of compliance efforts made from June 2019- April 2022. The policies, procedures, standards, practices, and analysis provided in this document illustrate how RTD ensures compliance with Title VI by providing documentation in accordance with FTA grant recipient requirements. Below is an overview of the collection of documents and information that comprise the 2022 Title VI Program Update.

The General Manager and Chief Executive Officer has overall responsibility for carrying out the agency's commitment to the Title VI Program. RTD's Civil Rights Director and Transit Equity Manager are chiefly responsible for administering and monitoring Title VI requirements, but it is the duty of every employee and contractor of the agency to ensure compliance with nondiscrimination and to further civil rights protections. Thus, the RTD Board of Directors must approve the agency's Title VI Program prior to its submittal to FTA.

Definitions

The following terms and definitions are from FTA Circular 4702.1B unless otherwise noted.

Direct Recipient – An entity that receives funding directly from the FTA. For purposes of Title VI, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to subrecipients, whereas a primary recipient does.

Discrimination – Any action or inaction, whether intentional or unintentional, in any program or activity of a federal aid recipient, subrecipient or contractor that results in disparate treatment or disparate impact and/or perpetuates the effects of prior discrimination based on race, color or national origin.

Disparate Impact – A facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color or national origin.

Disparate Treatment – Actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color or national origin.

Disproportionate Burden – A neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Environmental Justice – EO 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," was signed by President Clinton on February 11, 1994. After issuance of the EO, the U.S. Department of Transportation (DOT) issued a DOT Order for implementing the EO on EJ. The DOT Order (Order 5610.2(a), "Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," 77 FR 27534, May 10, 2012) describes the process that the Department and its modal administrations (including FTA) will use to incorporate EJ principles into programs, policies and activities.

Fare Media – a form of payment for transit service (i.e. cash fare, monthly pass, etc...).

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Fare Change – an increase in the price of fare media, decrease in the price of fare media, creation of new fare media or the discontinuance of existing fare media.

Fixed Route – Public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Limited English Proficient (LEP) Persons – Persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English including people who reported to the U.S. Census that they speak English less than very well.

Low-Income Person – As defined by RTD, for the purposes of Title VI, low-income is defined as a person whose median household income is at or below 150 percent of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Low-Income Population – Any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy, or activity.

Low-Income Transit Route – A route that has at least one half of its total revenue mileage in a Census block or block group with a percentage of low-income population that exceeds the percentage of low-income population in the transit service area as a whole.

Minority Persons – Include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America) and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South American, Central American or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.

Minority Population – Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy or activity.

Minority Transit Route – As defined by RTD and in conformance with FTA C4702.1B, a route that has at least one third of its total revenue mileage in a Census block or block group with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

National Origin – The particular nation in which a person was born, or where the person's parents or ancestors were born. National Origin includes limited English proficiency.

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Non-Minority Persons – White (non-Hispanic)

Public Transportation – Regular, continuing shared-ride surface transportation services that are open to the public or open to a segment of the public defined by age, disability or low-income. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers and vans. Public transportation does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments or intra-terminal or intra-facility shuttle services. Public transportation can be either fixed route or demand response service.

Recipient – Any public or private entity that receives federal financial assistance from the FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

Service Standard/Policy – An established service performance measure or policy used by a transit provider or other recipient to plan or distribute services and benefits within its service area.

Subrecipient – An entity that receives federal financial assistance from FTA through a primary recipient.

Title VI Program – A document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to the FTA.

Transit Equity – RTD defines Transit Equity as the following:

- Policies that promote the equitable distribution of burdens and benefits
- Promoting fair and equal access to resources and services
- Engaging transit-reliant customers in meaningful planning and decision-making processes

Transit Provider – Any entity that operates public transportation service including states, local and regional entities, and public and private entities. This term is inclusive of direct recipients, primary recipients, designated recipients and subrecipients that provide fixed route public transportation service.

Part I: General Requirements

FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years. For all recipients, the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. **Attachment A** includes a copy of the RTD Board of Director's (Board) resolution evidencing approval of RTD's Title VI Program.

The General Requirements section of this report contains Title VI Program components required in Chapter III of FTA Circular 4702.1B. This section includes the following information:

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. List of Title VI Investigations, Complaints and Lawsuits
4. Public Participation Plan
5. Language Access Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Equity Analysis for Facilities Siting and Construction
9. Equity Analyses of Major Service and Fare Changes Completed Since the 2019 Submission

Title VI Notice and Complaint Procedures

RTD posts the Title VI public notice on the agency website,² on all vehicles³ (bus and rail) and in its administrative⁴ offices. Additionally, RTD's Title VI complaint forms⁵ and procedures are available on the agency website.

RTD's Title VI Website Notice

RTD's Title VI website notice is stated below:

RTD Respects Civil Rights

RTD operates its programs without regard to race, color and national origin in accordance with applicable law.

RTD Title VI Policy Statement

Title VI of the Civil Rights Act of 1964 states:

² <https://www.rtd-denver.com/reports-and-policies/title-vi-policy>

³ See **Attachment B**, Vehicle Title VI notice

⁴ See **Attachment C**, Administrative Offices Title VI notice

⁵ See **Attachment D**, RTD's Title VI complaint form

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"No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

RTD is committed to complying with the requirements of Title VI in all its federally funded programs and activities. To request additional information on RTD's Title VI nondiscrimination requirements, call us at 303-299-2370 (TTY 7-1-1) or send us an email at titlevicomplaints@rtd-denver.com.

Making a Title VI Complaint

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with RTD. Any such complaint must be in writing or submitted via online fillable form and filed with RTD within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact RTD by any of the methods below.

Mail

RTD, Attn: Transit Equity Manager
1660 Blake St - BLK-31
Denver, CO 80202

Direct Complaint Phone: 720-299-2061

Customer Service Phone: 303-299-6000

Fax: 303-299-2061

Email: titlevicomplaints@rtd-denver.com

You may file a complaint directly with the Federal Transit Administration:

Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE
Washington, D.C. 20590

Title VI Complaint Procedures

Any person who believes they have been excluded from participation in or denied the benefits of RTD's programs, activities, or services due to discrimination on the basis of race, color or national origin may file a Title VI complaint with RTD.

The complaint must be filed within 180 days from the date of the alleged discrimination. RTD permits the use of a representative to file a complaint on behalf of the complainant. All communication following the complaint will be directed to the complainant's representative primarily and the complainant secondarily.

Once a complaint is filed, RTD will review the complaint and determine if the agency has jurisdiction. The customer will receive an acknowledgement letter informing them whether the complaint will be investigated by RTD within seven business days from when the complaint was filed. Unless a longer period is specified by RTD,

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the complainant will have 10 days from the date of the letter to send requested information to the RTD investigator assigned to the case.

The investigator may interview any individuals named as witnesses and any other individuals who may have information. If more information is needed to resolve the case, RTD may contact the complainant or witness. If RTD's investigator is not contacted by the complainant or does not receive the additional information within the required timeline, RTD may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue their case.

RTD will generally complete an investigation within sixty (60) days from receipt of a completed complaint form. Although RTD strives to promptly resolve complaints, this process will differ depending on the complexity of the complaint, the individuals involved and other factors. Once the investigation has concluded, the complainant will receive a final response letter to the complaint.

If a complainant disagrees with RTD's determination, they may request reconsideration by submitting a request in writing to RTD's Transit Equity Manager within seven (7) days after the date of RTD's letter, stating with specificity the basis for the reconsideration. The Transit Equity Manager will notify the complainant of their decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the Transit Equity Manager will issue a determination letter to the complainant upon completion of the reconsideration review.

Title VI Investigations, Complaints, and Lawsuits

Federal recipients are required to directly accept, log, and investigate complaints of discrimination. Further, recipients are required to notify the public of their right to complaint and the procedures for processing their complaint. RTD has seen an increase in the frequency of complaints in the last three years.

Information regarding investigations, complaints and lawsuits for the reporting period is provided below.

- **Investigations.** There was one State of Colorado Civil Rights Division investigation initiated during the reporting period alleging race discrimination. RTD requested a withdrawal and reached a private settlement with the respondent. The charge was dismissed on January 26, 2022.
- **Lawsuits.** No lawsuits during the reporting period.
- **Complaints.** Complaints submitted to RTD were received, investigated, and resolved by RTD staff. Table 1 lists Title VI complaints received during the reporting period.

The Action Taken category is designated in accordance with the following:

- **No Violation Found:** The investigation concludes there was no violating conduct by the employee or did not occur
- **No Probable Cause Found:** The investigation concludes that the event did occur, but it was not in relation to Title VI protected classes
- **Probable Cause Found:** The investigation concludes that the event did occur and was in relation to Title VI protected classes

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Table 1: Title VI Complaints Received by RTD since Last Program Submittal

Date Filed	Title VI Basis	Status	Action Taken
May 21, 2019	Color	Closed	No Violation Found
July 29, 2019	Race, Color	Closed	No Probable Cause Found
December 11, 2019	Race, Color	Closed	No Probable Cause Found
March 5, 2020	Race	Closed	No Probable Cause Found
March 14, 2020	Race	Closed	No Violation Found
March 23, 2020	Race	Closed	No Violation Found
May 16, 2021	Race, Color	Closed	No Violation Found
May 19, 2020	Race, Color	Closed	No Probable Cause Found
May 29, 2020	Color	Closed	No Probable Cause Found
May 31, 2020	Race, National Origin	Closed	No Probable Cause Found
July 10, 2020	Race	Closed	No Violation Found
July 22, 2020	Color	Closed	No Violation Found
August 8, 2020	Race	Closed	No Violation Found
August 10, 2020	Race, Color	Closed	No Probable Cause Found
August 10, 2020	Race, Color	Closed	No Probable Cause Found
August 26, 2020	Race, Color	Closed	No Probable Cause Found
September 29, 2020	Race, Color	Closed	Violation Found
November 13, 2020	Race, Color	Closed	No Violation Found
November 17, 2020	Race, Color	Closed	No Violation Found
December 7, 2020	Race, Color	Closed	No Probable Cause Found
December 27, 2020	Race	Closed	No Violation Found
January 6, 2021	Race, Color	Closed	No Violation Found
January 11, 2021	Race, Color	Closed	No Probable Cause Found
January 18, 2021	Race, Color	Closed	No Violation Found
February 18, 2021	Race, Color	Closed	No Violation Found
February 3, 2021	Race	Closed	No Violation Found
February 6, 2021	Race, Color	Closed	No Violation Found
February 17, 2021	Race, Color	Closed	No Violation Found
February 18, 2021	Race, Color	Closed	No Violation Found

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February 22, 2021	Race, Color	Closed	No Violation Found
February 27, 2021	Race	Closed	No Violation Found
March 10, 2021	Race, National Origin	Closed	No Violation Found
March 10, 2021	Race, Color, National Origin	Closed	No Probable Cause Found
March 12, 2021	Race, Color	Closed	No Violation Found
March 13, 2021	Race, Color	Closed	No Probable Cause Found
March 16, 2021	Race	Closed	No Violation Found
March 18, 2021	Race, Color	Closed	No Probable Cause Found
March 20, 2021	Race, Color	Closed	No Violation Found
March 28, 2021	Race, Color, National Origin	Closed	No Violation Found
April 2, 2021	Race, Color	Closed	No Violation Found
April 8, 2021	Color	Closed	No Violation Found
April 8, 2021	Race, National Origin	Closed	No Violation Found
April 20, 2021	Race, Color	Closed	No Violation Found
April 24, 2021	Race, Color	Closed	No Violation Found
April 27, 2021	Race, Color	Closed	No Violation Found
April 28, 2021	Race, Color	Closed	No Violation Found
May 4, 2021	Race	Closed	No Violation Found
May 10, 2021	Race	Closed	No Probable Cause Found
May 11, 2021	Race	Closed	No Probable Cause Found
May 12, 2021	Race	Closed	No Violation Found
May 19, 2021	Race	Closed	No Probable Cause Found
May 21, 2021	Race	Closed	No Probable Cause Found
May 21, 2021	Race	Closed	No Violation Found
May 23, 2021	Color	Closed	No Probable Cause Found
May 25, 2021	Race	Closed	No Violation Found
June 3, 2021	Race	Closed	No Probable Cause Found
June 7, 2021	Color	Closed	Administrative Closure
June 9, 2021	Race	Closed	No Probable Cause Found
June 12, 2021	Race	Closed	Probable Cause Found
June 13, 2021	Race	Closed	No Violation Found

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July 4, 2021	National Origin	Closed	No Probable Cause Found
July 16, 2021	Race	Closed	No Violation Found
July 22, 2021	Race	Closed	Administrative Closure
August 5, 2021	Race	Closed	No Violation Found
August 16, 2021	Race	Closed	No Violation Found
August 21, 2021	Race	Closed	No Violation Found
August 31, 2021	Race	Closed	No Probable Cause Found
August 31, 2021	Race	Closed	No Probable Cause Found
September 7, 2021	Race	Closed	No Probable Cause Found
September 8, 2021	Race	Closed	Administrative Closure
September 10, 2021	Race	Closed	No Probable Cause Found
September 16, 2021	Race	Closed	No Probable Cause Found
September 17, 2021	Race	Closed	No Violation Found
September 28, 2021	Race	Closed	No Probable Cause Found
September 29, 2021	Race	Closed	No Probable Cause Found
September 29, 2021	Race	Closed	No Violation Found
October 2, 2021	Race	Closed	No Violation Found
October 7, 2021	Race	Closed	No Violation Found
October 9, 2021	Race	Closed	No Violation Found
October 12, 2021	Race	Closed	No Probable Cause Found
October 13, 2021	Race	Closed	No Violation Found
October 14, 2021	Race	Closed	No Violation Found
October 14, 2021	Race	Closed	No Probable Cause Found
October 18, 2021	Race	Closed	No Violation Found
October 25, 2021	Race	Closed	No Violation Found
October 31, 2021	Race	Closed	Probable Cause Found
November 1, 2021	Race	Closed	No Probable Cause Found
November 18, 2021	Race	Closed	No Violation Found
November 18, 2021	Race	Closed	No Violation Found
November 24, 2021	Race	Closed	No Violation Found
November 29, 2021	Race	Closed	No Violation Found

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December 6, 2021	Race	Closed	No Violation Found
December 11, 2021	Race	Closed	No Violation Found
December 13, 2021	Race	Closed	No Violation Found
December 16, 2021	Race	Closed	No Violation Found
December 17, 2021	Race	Closed	No Violation Found
December 22, 2021	National Origin	Closed	No Violation Found
December 27, 2021	Race	Closed	No Violation Found
January 24, 2022	Race	Closed	No Violation Found
January 29, 2022	Race	Closed	No Violation Found
February 2, 2022	Color	Closed	No Probable Cause Found
February 3, 2022	Race	Closed	No Violation Found
February 8, 2022	Race	Closed	No Violation Found
February 18, 2022	Race	Closed	No Violation Found
February 22, 2022	Race	Closed	No Probable Cause Found
February 28, 2022	Race	Closed	No Violation Found

To address the increase in complaints, RTD is implementing a Transit Equity Nondiscrimination training program. The goal of the program is to provide customer facing employees with the cultural competency and awareness necessary to enhance the customer experience for all.

Public Participation Plan

RTD has an established comprehensive public involvement process to ensure minority, low-income, and LEP populations are engaged through public outreach and involvement activities. RTD's Public Participation Plan (PPP) in **Attachment E** was originally submitted to the FTA on May 2019 as part of the response to the FTA's Title VI Program Review and has been updated as part of this submittal. The Public Participation Plan also describes RTD's approach to achieving diversity on its non-elected advisory committee(s). RTD's Transit Equity Office serves as a resource to other RTD divisions to integrate these populations into RTD's public involvement activities.

In proposing service or fare changes, RTD uses a variety of methods to communicate and solicit feedback from the community and targeted populations. RTD also engages in extensive community outreach in conjunction with large-scale projects to ensure that affected residences and businesses are informed about the impacts and benefits of the project and are provided an opportunity for input in planning and implementation. On routes where there are a significant number of LEP customers or households, RTD staff translates materials to ensure that those community members can participate. Special attention is paid to the identification of any transit-reliant persons potentially affected by a route or service change.

Consistent with the requirements of Title VI, RTD staff use geographic information systems (GIS) mapping software to create maps that identify affected low-income, minority and LEP communities.

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The analysis is shared with RTD staff working with affected communities to identify strategies to engage minority, low-income and LEP populations.

Community Engagement for 2022 Title VI Program Update

The following items were completed to gather input on RTD's Disparate Impact and Disproportionate Burden policies, adding access to key public service destinations into service equity analyses as well as RTD's Language Access Plan update.

Transit Equity staff researched disparate impact and disproportionate burden policies from 16 transit agencies and consulted with over 25 Title VI staff from FTA Regions VII, VIII, and X.

- Citizens Advisory Committee (CAC): RTD staff consulted with CAC throughout the Program Update process. At its February 16, 2022 meeting, CAC reviewed and discussed the proposed updates to the Disparate Impact and Disproportionate Burden policies. The committee also participated in the Transit Equity Survey to give input on the Title VI Program Update and the revised Language Access Plan.
- Transit Equity Survey: RTD also sent a questionnaire to staff at 36 community-based organizations as well as leveraged multicultural partners to distribute the surveys (both English and Spanish). The questionnaire asked about Title VI Program awareness, observations of changes to service or fares that have had a significant impact on clients served, thoughts on what else should be considered when making service changes and examples of evaluating policies for potential disproportionate impacts to low-income persons and/or persons of color. RTD received a total of 210 responses to the questionnaire.
- Dedicated Email Blast: Proposed Disparate Impact and Disproportionate Burden policies were then posted on rtd-denver.com along with the full draft of the Title VI Program Update for public comment. How this outreach informed RTD's Disparate Impact, and Disproportionate Burden policies and thresholds is described in Part II: Title VI Equity Analysis Policies.

Language Access Plan

RTD is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services, and benefits for persons with limited English proficiency, or LEP. In 2022, RTD updated its Language Access Plan and developed a 2022-2025 Implementation Schedule after an extensive review of the LEP populations in the RTD service area and their needs. Staff will use the recommended two-tiered approach to meet the needs of LEP populations: Tier One retains successful programs and activities designed to meet the language needs of LEP populations, and Tier Two identifies new areas of focus to further the agency's goal of providing LEP customers with meaningful access to RTD programs and services. This plan will guide RTD in how to best serve LEP populations and is provided in **Attachment F**.

Subrecipient Monitoring

RTD's subrecipients of federal financial assistance must also comply with Title VI of the Civil Rights Act of 1964. To meet its enforcement responsibilities under Title VI, RTD has implemented a subrecipient monitoring process. The RTD Transit Equity Office will ensure that the following actions are taken to ensure that RTD and its subrecipients comply with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B:

1. Each year subrecipients must provide RTD with a signed FTA Civil Rights Assurance (Subrecipient Title VI Policy Statement) that all records and other information required under FTA Circular 4702.1B have been or will be compiled, as appropriate, and maintained.

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2. Each subrecipient must implement a Title VI complaint process and provide RTD with a list of active lawsuits and Civil Rights Complaint summary alleging discrimination on the basis of race, color or national origin.
3. Each subrecipient must post its Title VI Policy Statement in prominent, conspicuous, and accessible locations throughout its facilities.
4. Subrecipients must take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP.

In general, subrecipients should have a public participation process that offers early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions. Efforts to involve minority and low-income people in public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures targeted to overcome linguistic, institutional, cultural, economic, historical or other barriers that may prevent minority and low-income populations from effectively participating in a subrecipient's decision-making. Subrecipients must file documentation of their PPP with RTD.

Each subrecipient further agrees to comply with and assure compliance by its third-party subcontractors at any tier under each grant, with all requirements of the FTA Title VI Program pursuant to FTA Circular 4702.1B, 49 CFR 21.5(b)(2), 49 CFR 21.5(b)(7), and 49 CFR Part 21, Appendix C.

Subrecipient Title VI Program Review

As a designated recipient of FTA funds, RTD receives, administers, and allocates funds to subrecipients and is responsible for documenting compliance with Title VI. RTD's responsibilities include monitoring subrecipient compliance with Title VI, collecting and reviewing Title VI documents (including subrecipient Title VI data to FTA) and assisting subrecipients.

RTD developed the Subrecipient Title VI Compliance Guide (**Attachment G**) to help subrecipients understand the federal requirements. The guide outlines programmatic and fiscal responsibilities of various roles to ensure that subrecipients are complying with federal requirements and are using federal funds appropriately. Project managers, who are ultimately responsible for the achievement of subrecipient outcomes, are involved in every step of the process by ensuring that appropriate agreements are in place. Said agreements contain the required federal, state, and local language; and performance measures and all compliance requirements are met.

Project Manager(s), Transit Equity Manager, Transit Equity Specialist and/or the Grants Administrator provide ongoing assistance to subrecipients through communications, trainings (when requested) and access to subject matter experts within RTD for information and data.

Subrecipients are made aware of the Title VI Program requirements prior to acceptance of grant funds. RTD reviews all subrecipient Title VI Programs on a triennial basis and receives and reviews annual reports submitted by November 1. RTD also monitors Title VI compliance with entities who receive local funding from RTD. Prior to entering into funding agreements, partner entities are made aware of Title VI compliance requirements.

Service Performance Monitoring and Transit Service Policies and Standards

Transit Service Policies and Standards FTA Circular 4702.1b Chapter VI requires fixed-route service providers of urbanized areas with a population of 200,000 or more to establish service standards and monitor their service to ensure service is provided accordingly. Service standards guide fixed-route service providers toward objective decision-making in the provision of service. The FTA further expects transit agencies to monitor their services to

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ensure service is provided in a non-discriminatory manner. The detailed Service Performance Monitoring Report can be found in **Attachment H** and the Transit Service Policies and Standards can be found in **Attachment I**.

Facility Siting and Construction

Since the last Title VI Program submission in 2019, RTD has not selected a site for one facility meeting the applicable definitions under Title VI. RTD's process for conducting equity analyses related to facility siting and construction follows the guidance provided in the Circular/Title 49 CFR and included below.

Title 49 CFR Section 21.9(b)(3) states, in determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.

Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, the location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color or national origin.

According to the FTA Circular 4702.1B to comply with the regulations when constructing storage facilities, maintenance facilities or operations centers.

1. Complete a Title VI equity analysis during the planning stage regarding where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the U.S. Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
3. If the recipient determines that the location of the project will result in a Disparate Impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less Disparate Impact on the basis of race, color, or national origin. The recipient must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a Disparate Impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Part II: Title VI Equity Analysis Policies

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a Major Service Change Policy, a Disparate Impact Policy and a Disproportionate Burden Policy. Collectively, these policies provide foundational requirements for evaluating service change proposals for equity.

In the development of the equity policies, RTD sought public feedback on the disparity and disproportionate burden thresholds through a series of public meetings and surveys. These policies and their applicable thresholds are listed below:

Major Service Change

A major service change is defined as a 25% addition or reduction in the service hours of any route that would remain in effect for twelve (12) or more months. All major service changes will be subject to an equity analysis that includes an analysis of adverse effects. A Title VI Service Equity Analysis will be completed for all major service changes and will be presented to the RTD Board of Directors for its awareness, consideration and will be included in the subsequent RTD Title VI Program report with a record of action taken by the Board.

Adverse Effect is defined as a geographical or temporal reduction in service that includes, but is not limited to eliminating a route, shortening a route by eliminating segments, rerouting an existing route, and increasing headways. RTD shall consider the degree of adverse effects and analyze those effects when planning major service changes.

Service Disparate Impact Policy

A major service change should not adversely affect a minority population 10% more than non-minority populations; this level of impact is considered a disparate impact. Given a potential disparate impact, RTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, RTD will take measures to minimize or mitigate the adverse impact of the proposed action.

To determine the effects of a major service reduction to a single line/route, the percentage of RTD's impacted minority population is compared to the percentage of RTD's impacted non-minority population. If the percentage of the minority population impacted is at least 10% greater than the percentage of the non-minority population impacted, then the impact of changes will be considered disparate.

To determine the system-wide effects of major service reductions on more than one line/route, the percentage of RTD's impacted minority population is compared to the percentage of the RTD's impacted non-minority population. If the percentage of the minority population impacted is at least 10% greater than the percentage of the non-minority population impacted, then the overall impact of changes will be considered disparate.

To determine the effects of a major service increase to a single line, the percentage of RTD's impacted minority population is compared to the percentage of RTD's impacted non-minority population. If the percentage of the minority population impacted is at least 10% less than the percentage of the non-minority population impacted, then the impact of changes will be considered disparate.

To determine the system-wide impacts of major service increases on more than one line/route, the percentage of RTD's impacted minority population is compared to the percentage of the RTD's impacted non-minority population. If the percentage of the minority population impacted is at least 10% less than the percentage of the non-minority population impacted, then the overall impact of changes will be considered disparate.

Service Disproportionate Burden Policy

A major service change should not adversely affect a low-income population 10% more than non-low-income populations; this level of impact is considered a disproportionate burden. Given a potential disparate impact, RTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, RTD will take measures to minimize or mitigate the adverse impact of the proposed action. Low-income population is defined by RTD as a group of households who are at or below 150 percent of the Department of HHS Poverty Guidelines.

To determine the effects of a major service reduction to a single line/route, the percentage of RTD's impacted low-income population is compared to the percentage of RTD's impacted higher income population. If the percentage of the low-income population impacted is at least 10% greater than the percentage of the higher income population impacted, then the impact of changes will be considered a disproportionate burden

To determine the system-wide impacts of major service reductions on more than one line/route, the percentage of RTD's impacted low-income population is compared to the percentage of the RTD's impacted higher income population. If the percentage of the low-income population impacted is at least 10% greater than the percentage of the higher income population impacted, then the overall impact of changes will be considered a disproportionate burden

To determine the effects of a major service increase to a single line/route, the percentage of RTD's impacted low-income population is compared to the percentage of RTD's impacted higher income population. If the percentage of the low-income population impacted is at least 10% less than the percentage of the higher income population impacted, then the impact of changes will be considered a disproportionate burden

To determine the system-wide impacts of major service increases on more than one line/route, the percentage of RTD's impacted low-income population is compared to the percentage of the RTD's impacted higher income population. If the percentage of the low-income population impacted is at least 10% less than the percentage of the higher income population impacted, then the overall impact of changes will be considered a disproportionate burden.

Upon determination of a disparate impact or disproportionate burden, RTD will do one of the following:

- a) Alter the service proposal to avoid, minimize or mitigate potential disparate impacts or disproportionate burdens, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is and show that there are no alternatives that would have a less disparate impact on minority customers but would still accomplish the project or program goals.

Additional Access Considerations

To complement the quantitative disparate impact and disproportionate burden analyses above, RTD may include an assessment of access to key public service destinations (employment, education, food, social and human service centers, and health care) for minority and low-income populations.

2022 Title VI Program Update



Public Participation and Board Approval

Feedback on this Program and the policies therein generally did not differ between how RTD should treat analysis of disparities based on race (disparate impact policy) and income (disproportionate burden policy). Thus, the two policies remain equivalent.

Between 2021 and 2022, RTD sent a questionnaire to staff at 36 organizations participating in the agency's low-income fare program for low-income transit customers and the Non-Profit Pass Program. The questionnaire asked about Title VI program awareness, observations of changes to service or fares that have had a significant impact on clients served, thoughts on what else should be considered when making service changes and examples of evaluating policies for potential disproportionate impacts to low-income persons and/or persons of color.

After reviewing survey responses, RTD decided to include access considerations (employment, education, food or health care) when performing an equity analysis. Moreover, participants supported the former population-based approach (i.e., looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts) as well as the inclusion of customer surveys to the extent possible.

The process to include system-wide analysis for the disparate impact and disproportionate burden policies for service changes started with researching policies from 16 comparable transit agencies and consulting with over 25 Title VI staff from FTA Regions VII, VIII and X. RTD staff consulted with the CAC (February 16, 2022) as well as community-based organizations (e.g., Denver Streets Partnerships, Growing Home, and CREA Results) and received full support on these proposed changes.

Fare Disparate Impact or Disproportionate Burden Policy

Per the policy, the difference in the adverse effects absorbed by minority and low-income persons as a result of any fare change or the average of multiple fare changes shall not be greater than or less than 5% of impacts absorbed by the overall ridership. Further, if proposed changes require the use of or the discontinuance of fare media, the equity analysis should consider access to fare media, vending machines, and other add-value mechanisms (e.g., online, retail network), or other changes associated with the fare media's use.

If a proposed fare change results in a disparate impact or a disproportionate burden, RTD will consider modifying the proposed fare change. RTD will then analyze the modification and make sure it removed the potential disparate impact or disproportionate burden. If a less discriminatory option cannot be identified and RTD can demonstrate a substantial legitimate justification for the proposed fare change, the FTA may allow RTD to proceed with the proposed change.

Major Service Change and Fare Change Equity Analysis

RTD considers possible equity impacts in developing potential service and fare changes and evaluates proposals for major service changes and any fare changes for potential adverse effects, disparate impacts, and/or disproportionate burdens.

Since the time of the last Title VI Program submittal, RTD has implemented several improvements to service and changes to fares. The three reports noted below cover the equity analyses of all major service changes and all fare changes implemented since May 2019, and are provided as Attachments J–M, along with corresponding documentation of the RTD Board's consideration, awareness, and approval of each.

- MyRide Fare Equity Analysis: Approval at the May 24, 2022 Board Meeting
- September 2021 Service Change Plan Equity Analysis: Approval at the July 20, 2020 Board Meeting
- Covid-19 Service Change Equity Analysis: Approval at the April 20, 2021 Board Meeting
- May 2020 Service Change Plan Equity Analysis: Approval at the March 24, 2020 Board Meeting

Part III: Demographic Analysis

RTD uses demographic data to assess equity in distribution of services, facilities, and amenities in relation to minority, low-income and LEP populations. Such data informs RTD in the early stages of service, facilities and programs planning and enables RTD to monitor ongoing service performance, analyze the effects of policies and programs on these populations and take appropriate measures to avoid or mitigate potential disparities. RTD develops GIS maps and comparative charts to perform this analysis, relying on both ridership and population data within the service area.

The demographic data shown in this report is from the following sources:

- 2015-2019 American Community Survey (ACS)
- 2019 RTD Customer Satisfaction Survey

Current Service and Service Area

The maps shown in Figures V-1 to V-3 display the distribution of minority, low-income and LEP populations in relation to services throughout the RTD service area.

Service Area with Minority Population in Figure V-1 depicts the RTD network in relation to minority population by U.S. Census block group. Areas are shaded corresponding to block groups, which had a minority population greater than or equal to the average for the RTD District (35.6%) as of the 2015-2019 ACS. This is an increase from 34% indicated in the 2013-2018 ACS.

Service and Service Area with Low-Income Population in Figure V-2 depicts the RTD network in relation to low-income population by U.S. Census block group. Low-income is defined as earning equal to or less than 150% of the HSS federal poverty level. Areas are shaded corresponding to block groups, which had low-income populations greater than or equal to the average for the RTD District (15.5%) as of the 2015-2019 ACS. There are high concentrations of low-income households found throughout the service area.

LEP Population Distribution in Figure V-3 depicts the RTD network in relation to LEP population by U.S. Census tract, as language information is not available at a smaller geographic scale. Areas are shaded corresponding to all LEP population percentage by census tracts using the 2015-2019 ACS.

FIGURE V-1: SERVICE AND SERVICE AREA WITH MINORITY POPULATION

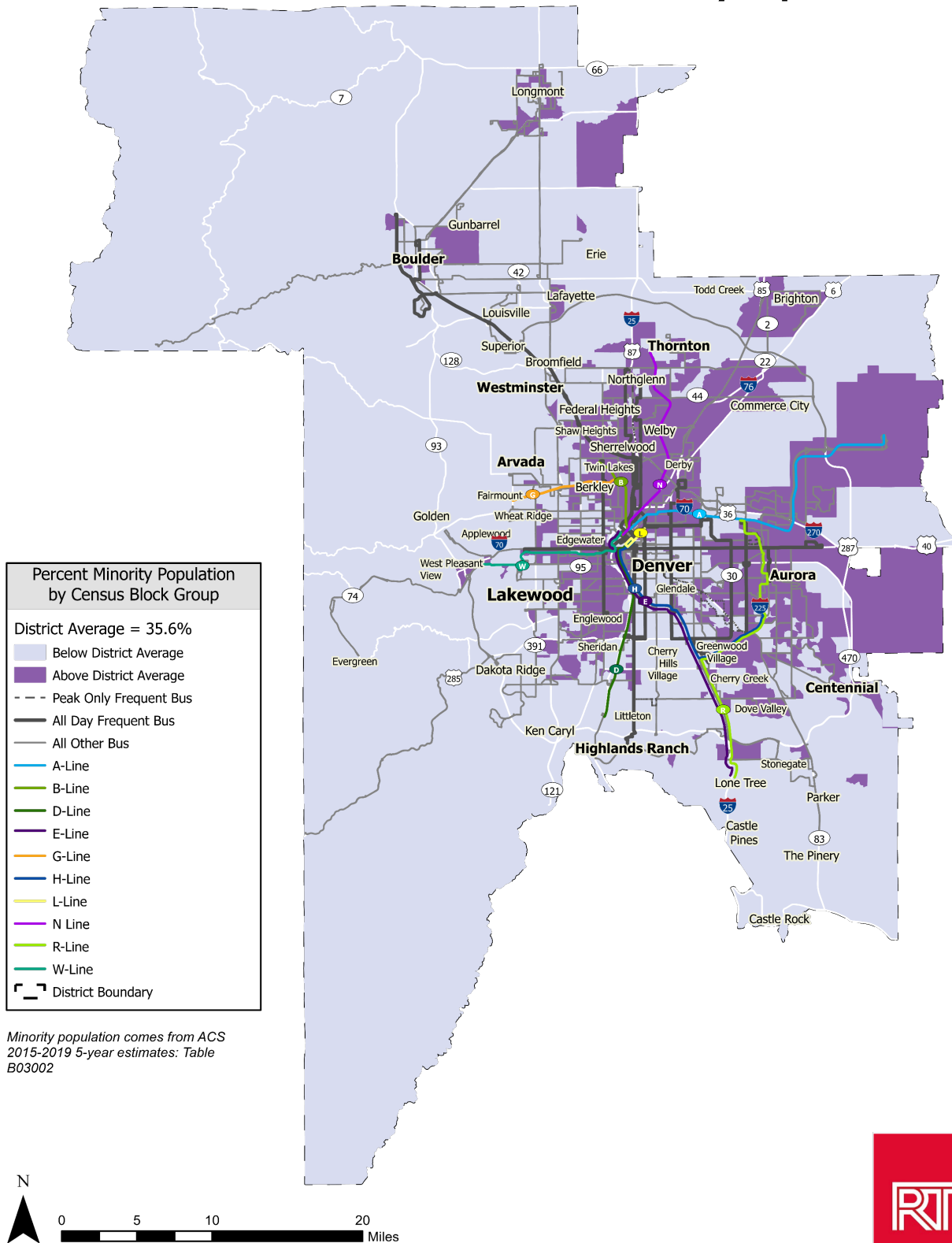


FIGURE V-2: SERVICE AND SERVICE AREA WITH LOW-INCOME POPULATION

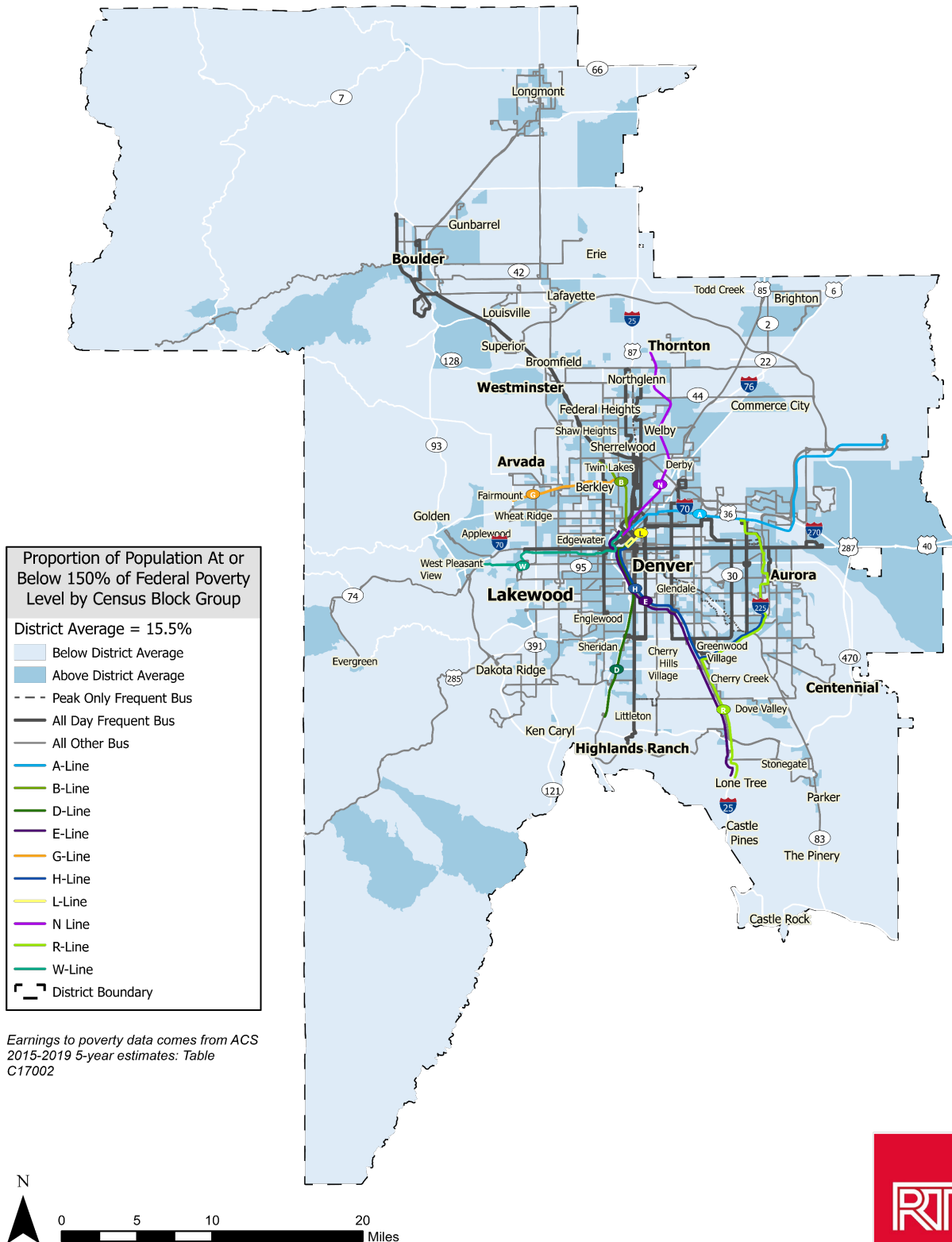
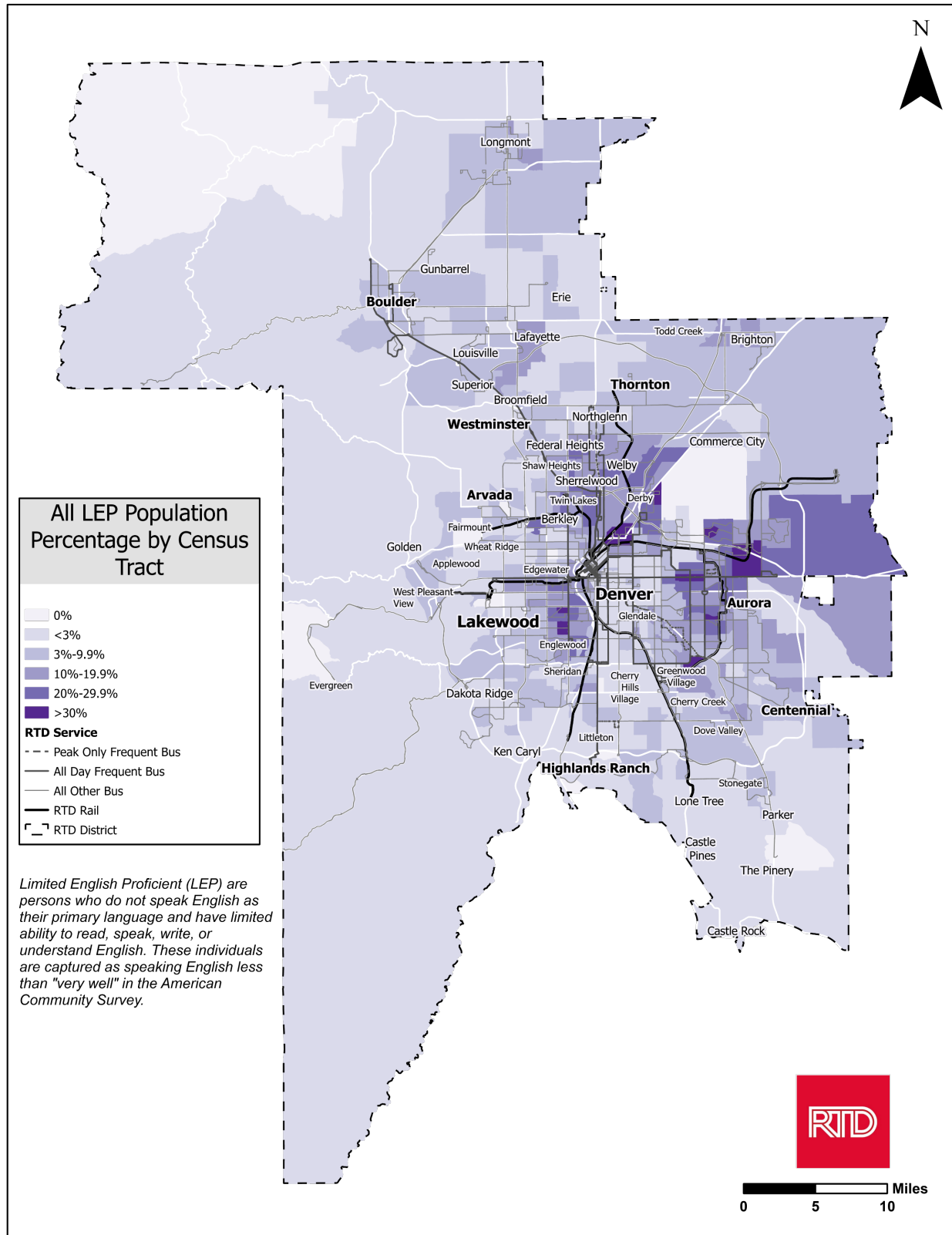


FIGURE V-3: SERVICE AND SERVICE AREA WITH LIMITED ENGLISH PROFICIENT DISTRIBUTION



2022 Title VI Program Update

Ridership Characteristics and Demographics (Trip Based)

RTD conducted the 2019 Customer Satisfaction Survey across all revenue generating services—including bus, SkyRide, light rail, commuter rail and FlexRide services—to assess how those changes may have affected customer satisfaction since 2017. The survey included various questions about participant characteristics, including level of education, household income, race/ethnicity, age and gender. As shown below:

- Approximately 50 percent of participants were men.
- More than 60 percent of participants were non-Hispanic white people (62%).
- More than one-half of participants were 45 years old or older (53%).
- More than one-third of participants reported residing in Denver county (37%).
- Approximately 30 percent of participants were low-income individuals.
- Nearly one-third of passengers reported not having a car available to them (30%).

An analysis of ACS data and Customer Satisfaction Survey results reveals minority and low-income ridership are predominately located within the densely populated urban communities of the RTD's service area. Since the 2019 Title VI Program Update, the minority population has increased from 34% to 35.6% and low-income population has decreased from 19% to 15.5% as noted in the ACS.

Facilities and Demographics Assessment

Three maps (Figures V-4, V-5 and V-6) are provided to illustrate determination of Title VI program compliance with respect to recent, in-progress and planned major transit facilities. These respective figures highlight transit facilities that:

1. Were recently⁶ replaced, improved, or;
2. Have improvements that are in progress, or;
3. Are where improvements are scheduled (planned projects and projects identified in planning documents for an update in the next five years).

Figure V-7 shows the location of existing facilities. Figure V-8 Existing Facilities with Minority Population shows the location of existing facilities in relation to Census block groups above the service district average for minority populations (35.6%). Figure V-9 Existing Facilities with Low-Income Population shows the location of existing facilities in relation to U.S. Census block groups above the service district average for low-income populations (15.5%). Facilities are depicted by type: administrative, operations/maintenance, park and ride, and transit centers.

⁶ Recently means since the prior Title VI Program submittal in 2019.

FIGURE V-4: RECENT, IN PROGRESS, AND PLANNED FACILITIES

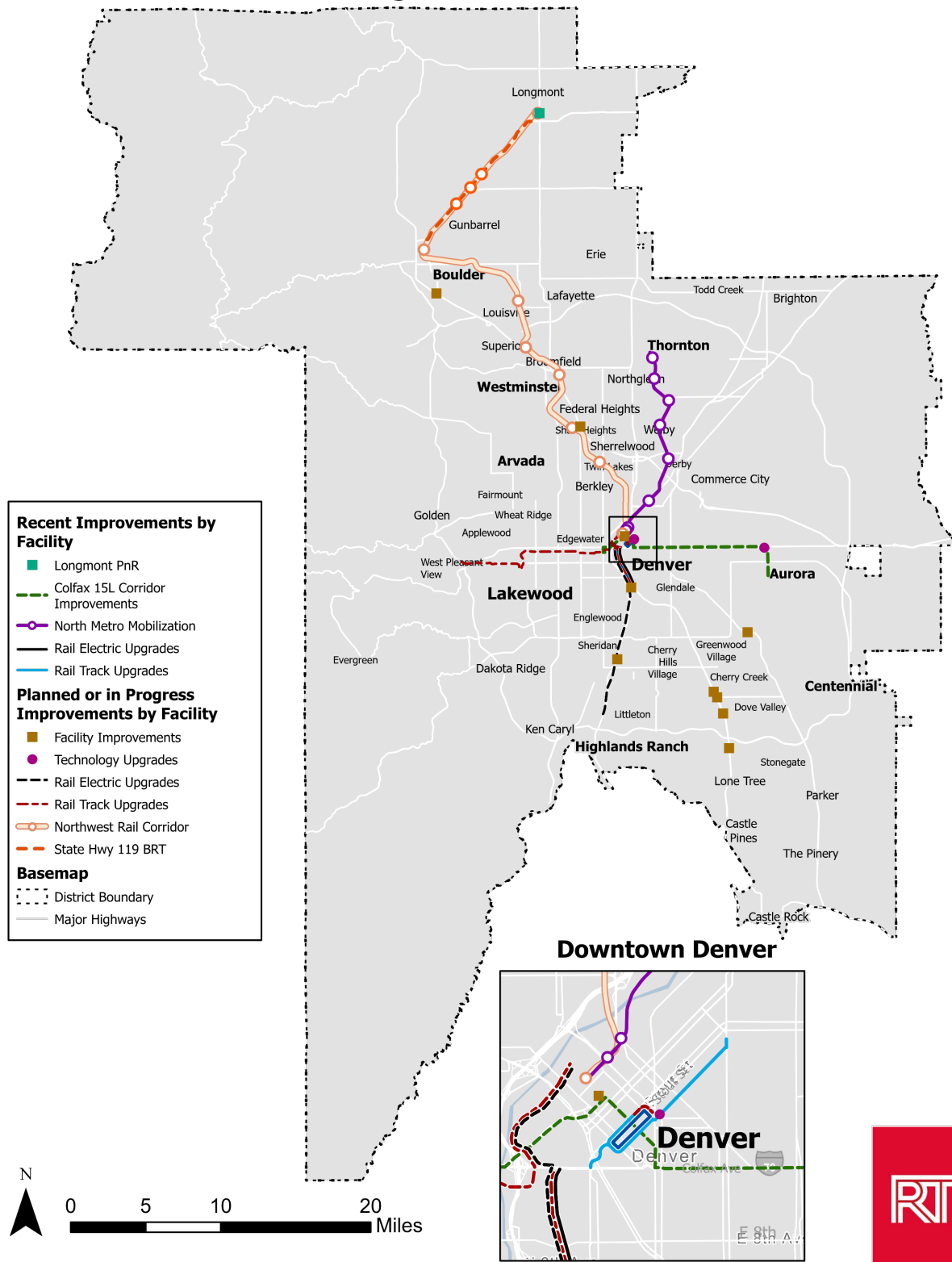


FIGURE V-5: RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH MINORITY POPULATION

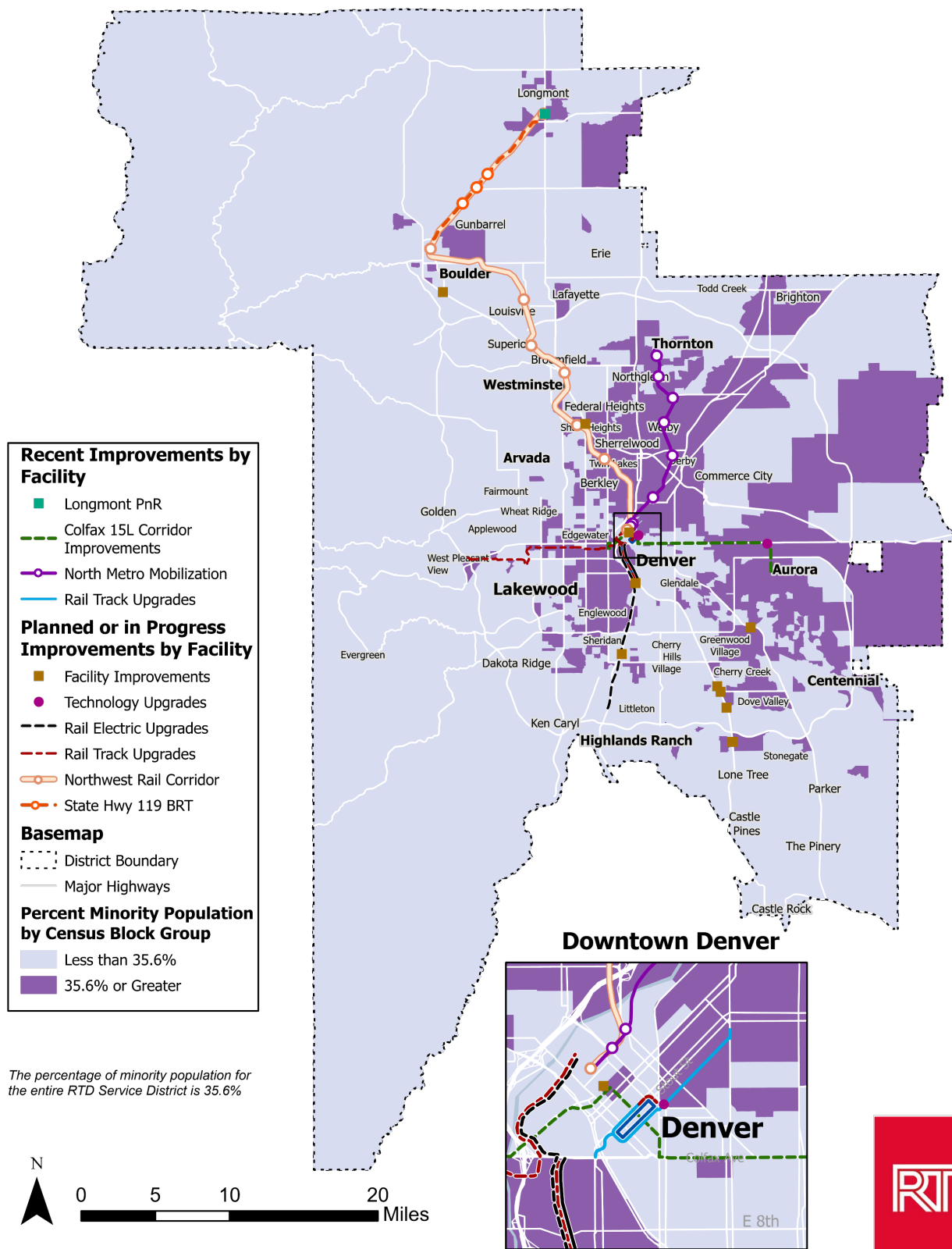


FIGURE V-6: RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH LOW-INCOME POPULATION

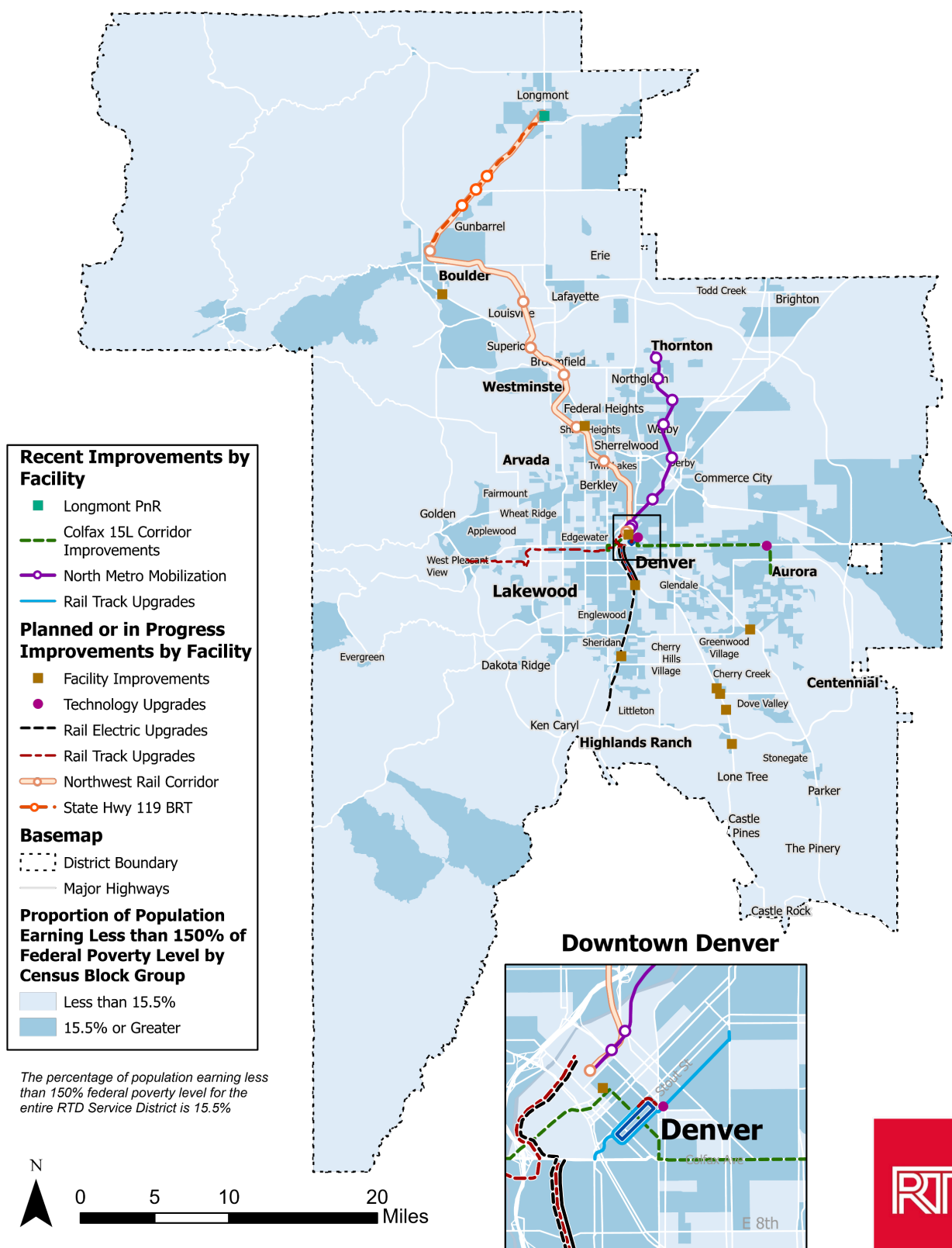


FIGURE V-7: EXISTING FACILITIES

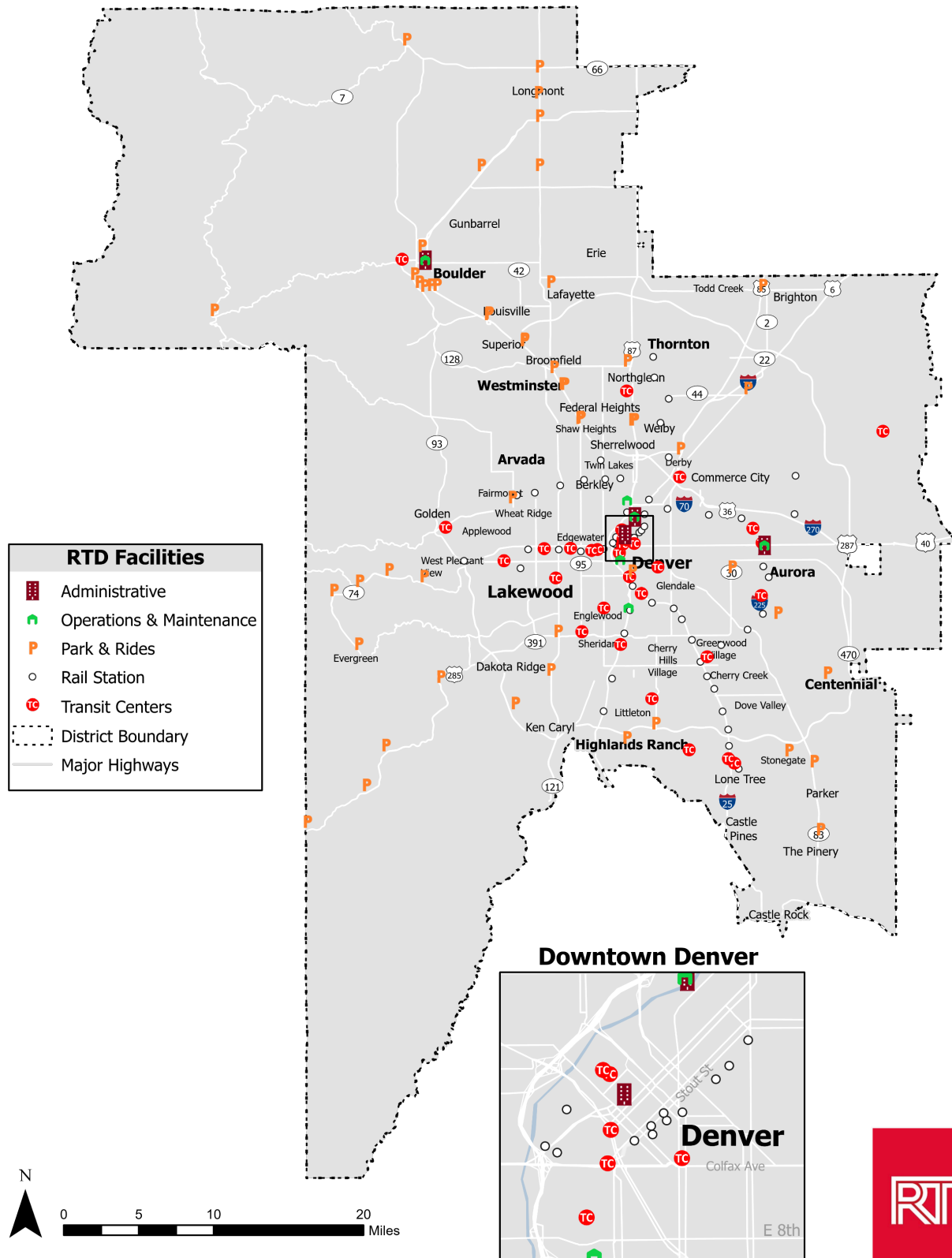


FIGURE V-8: EXISTING FACILITIES WITH MINORITY POPULATION

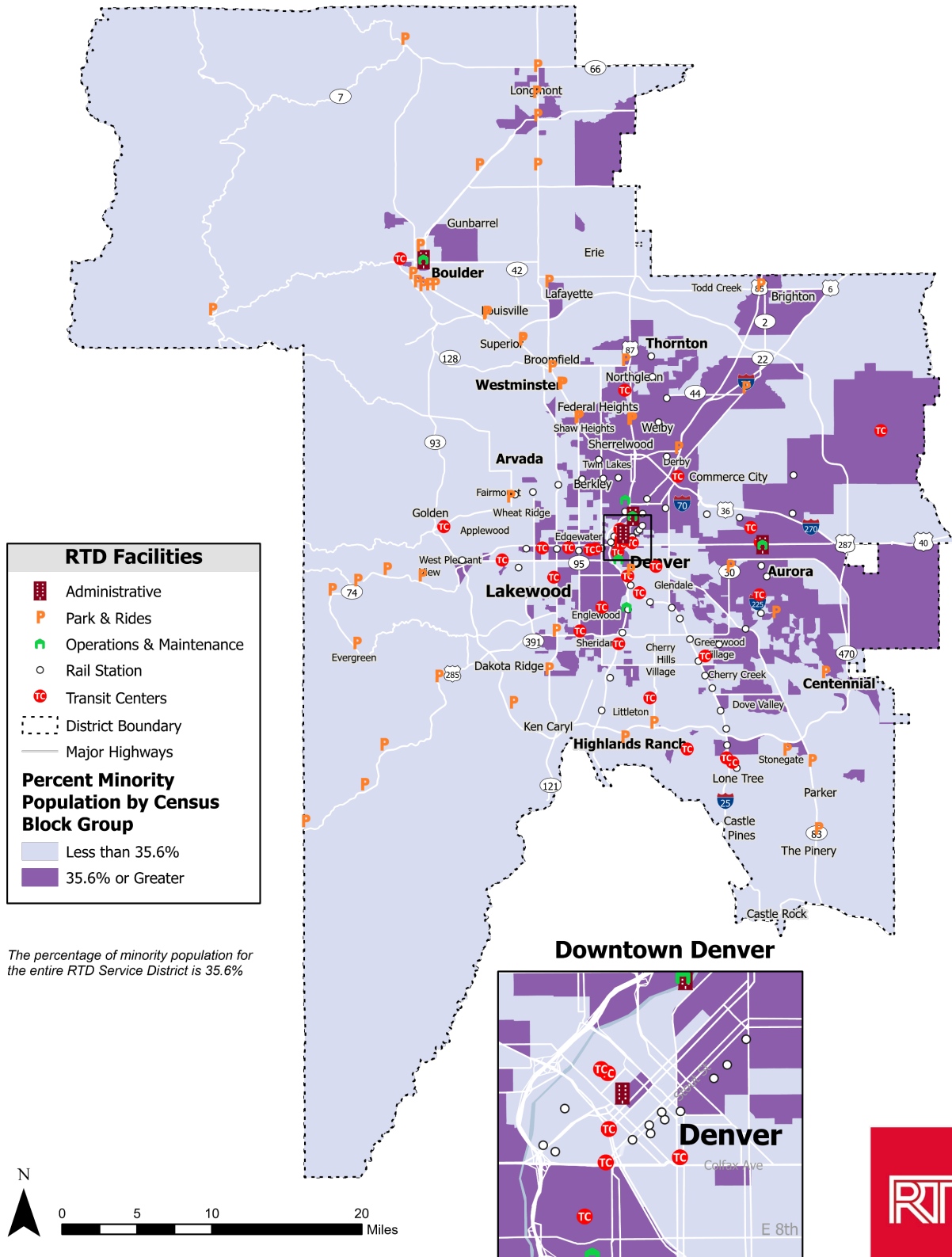
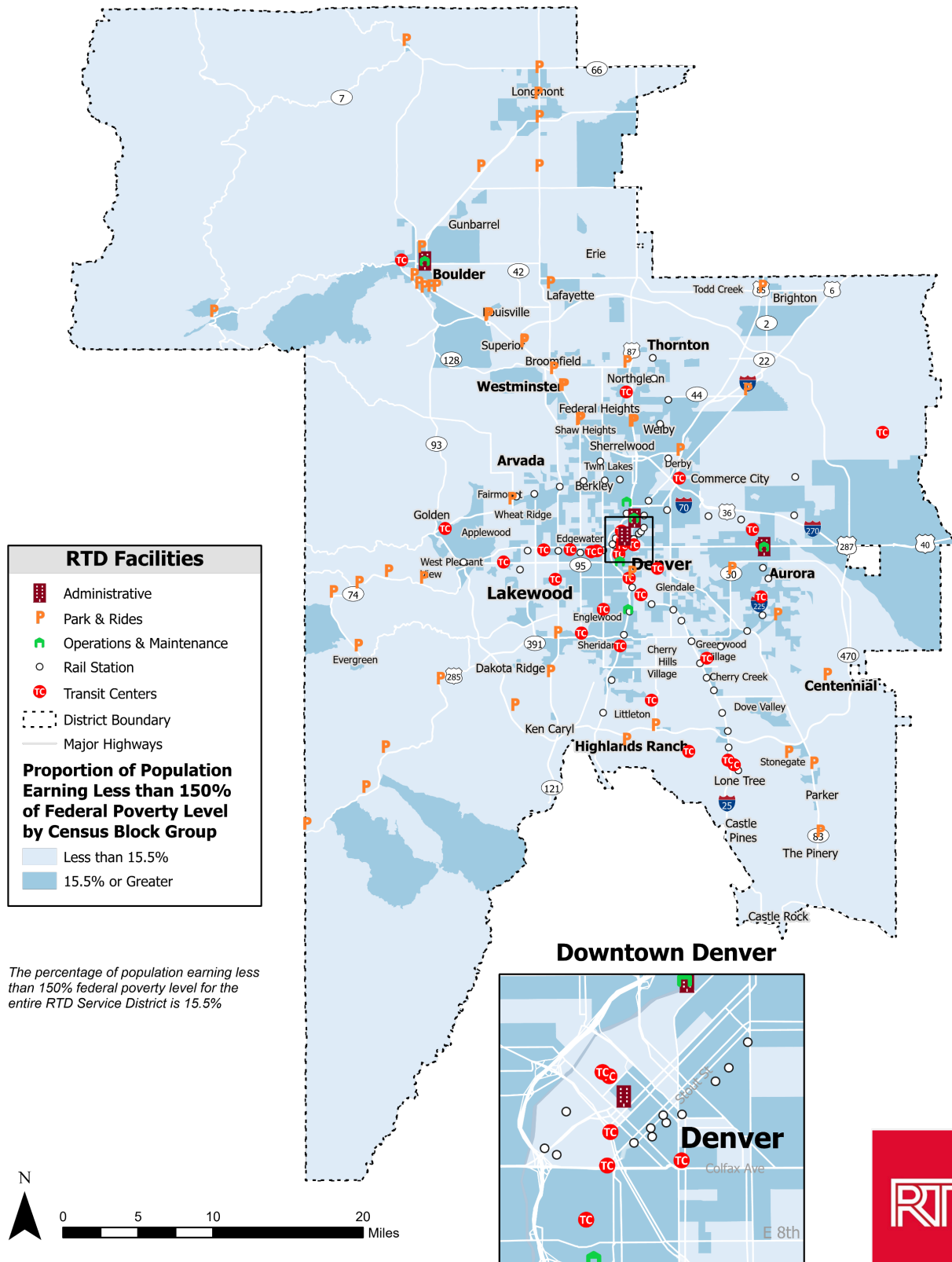


FIGURE V-9: EXISTING FACILITIES WITH LOW-INCOME POPULATION



2022 Title VI Program Update



Attachments

- A: RTD Board Recommend Action Approving RTD's 2022 Title VI Program and Policies
- B: RTD Title VI Complaint Forms
- C: RTD Title VI Vehicle Notice
- D: RTD Transit Equity Nondiscrimination Policy Notice
- E: RTD Public Participation Plan
- F: Language Access Plan and Implementation Schedule
- G: Subrecipient's Title VI Compliance Guide
- H: 2021 Service Performance Monitoring Report, with Documentation of Board Approval
- I: RTD Transit Service Policies and Standards
- J: MyRide Fare Equity Analysis, with Documentation of Board Approval
- K: September 2021 Service Change Plan Equity Analysis, with Documentation of Board Approval
- L: Covid-19 Service Change Equity Analysis, with Documentation of Board Approval
- M: May 2020 Service Change Plan Equity Analysis, with Documentation of Board Approval
- N: Data from 2019 Customer Satisfaction Survey

Attachment A

RTD Board Recommend Action Approving RTD's 2022 Title VI Program and Policies

BOARD OF DIRECTORS REPORT

2022 Title VI Program Update

Committee Meeting Date:
May 11, 2022
Board Meeting Date:
May 24, 2022

RECOMMENDED ACTION

For the Board of Directors to adopt the 2022 Title VI Program Update report in compliance with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964 (Title VI).

STAFF REPRESENTATIVE

Carl Green Jr., Transit Equity Manager

PRESENTATION LENGTH

20 minutes

BACKGROUND

Pursuant to Section 12 of the Federal Transit Administration (FTA) Master Agreement, RTD must comply with 49 CFR part 21 and FTA Circular 4702.1B, which effectuates Title VI. Title VI prohibits discrimination on the basis of race, color and national origin by recipients of federal funds.

Per FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, RTD is required to submit a Title VI Program Update every three years.

DISCUSSION

In adopting this recommended action, the agency seeks to meet the 2021-2026 Strategic Plan priorities of Community Value and Customer Excellence.

Staff seeks the Board's approval of the elements contained in the Title VI Program Update report, which details the manner in which the agency intends to achieve compliance with the following objectives of Title VI:

1. To ensure that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color, or national origin
2. To ensure that the level and quality of FTA-assisted transit services are sufficient to provide equal access and mobility for any person without regard to race, color or national origin
3. To ensure that opportunities to participate in the transit planning and decision-making are provided to persons without regard to race, color or national origin
4. To ensure that decisions on the location of transit services and facilities are made without regard to race, color or national origin
5. To ensure that corrective and remedial action is taken to prevent disparate impacts borne by any beneficiary based on race, color, or national origin

Proposed Policy Updates

Per FTA Circular 4702.1B, Chapter IV-4, a copy of Board meeting minutes or a resolution demonstrating the Board's consideration, awareness, and approval of the major service change policy, disparate impact policy, and disproportionate burden policy is required. As identified in Attachments A and B, the following are the proposed updates to the service disparate impact and disproportionate burden policies. Additionally, staff is requesting an additional assessment of access to key public service destinations (e.g., education, food, social and human service centers, and health care) as part of the service equity analysis.

Service Disparate Impact Policy

1. To determine the system-wide effects of major service reductions on more than one line/route, the percentage of RTD's impacted minority population is compared to the percentage of RTD's impacted non-minority population. If the percentage of the minority population impacted is at least 10% greater than the percentage of the non-minority population impacted, then the overall impact of changes will be considered disparate.
2. To determine the system-wide impacts of major service increases on more than one line/route, the percentage of RTD's impacted minority population is compared to the percentage of RTD's impacted non-minority population. If the percentage of the minority population impacted is at least 10% less than the percentage of the non-minority population impacted, then the overall impact of changes will be considered disparate.

Service Disproportionate Burden Policy

1. To determine the system-wide impacts of major service reductions on more than one line/route, the percentage of RTD's impacted low-income population is compared to the percentage of RTD's impacted higher income population. If the percentage of the low-income population impacted is at least 10% greater than the percentage of the higher income population impacted, then the overall impact of changes will be considered a disproportionate burden.
2. To determine the system-wide impacts of major service increases on more than one line/route, the percentage of RTD's impacted low-income population is compared to the percentage of RTD's impacted higher income population. If the percentage of the low-income population impacted is at least 10% less than the percentage of the higher income population impacted, then the overall impact of changes will be considered a disproportionate burden.

2021 Service Performance Monitoring Report

Per FTA Circular 4702.1B, Chapter IV-4, results of the monitoring program of service standards and policies and any action taken, including documentation (e.g., a resolution, copy of meeting minutes, or similar documentation) to verify the Board's consideration, awareness, and approval of the monitoring results is required. Staff analysis shows that overall, there was no significant difference in average performance between service provided to RTD's minority and low-income customers and the service provided to RTD's non-minority and higher income customers. However, there are certain aspects that were flagged as areas for improvement: 1) Revenue Hours of Service for minority light rail lines, and 2) Revenue Hours of Service for low-income commuter rail lines. Additionally, RTD is unable to examine vehicle assignments consistently or accurately at this time. The agency will explore other options to report this measure later in Calendar Year 2022, allowing for this portion of the analysis to be completed. The full results of the 2021 Service Performance Monitoring are demonstrated in Attachment C.

2022 Language Access Plan

Per FTA Circular 4702.1B, Chapter III-7, agencies are required to develop a Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on U.S. Department of Transportation LEP Guidance. As demonstrated in Attachment D, RTD's updated Language Assistance Plan (LAP) will guide the agency's language assistance measures from 2022 to 2025. After an extensive review of the 2019 LAP, RTD's LEP inter-division workgroup will implement a two-tiered approach to retain and expand upon past language assistance measures to better meet the needs of people with limited English proficiency.

FINANCIAL IMPACT

The adoption of the 2022 Title VI Program Update will not result in any direct or foreseeable financial impacts.

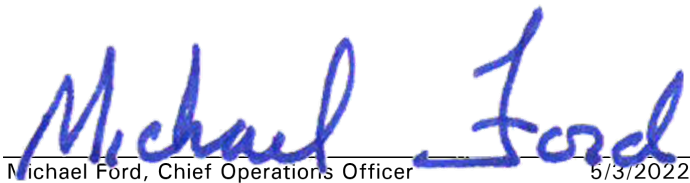
ATTACHMENTS:

- 2022 Title VI Program Update (PDF)
- 2022-05-01- Draft - 2022 Title VI Program Update Presentation to Board of Directors (PPTX)
- Attachment H 2021 Service Performance Monitoring Report (PDF)
- Attachment F 2022 Language Access Plan (PDF)

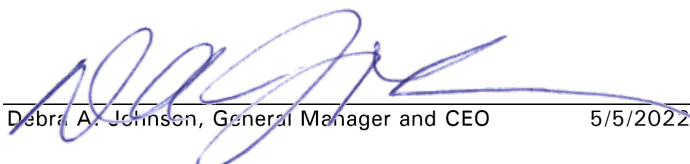
RESULT:	ADOPTED BY CONSENT VOTE [UNANIMOUS]
MOVER:	Troy Whitmore, Director, District K
SECONDER:	Angie Rivera-Malpiede, Director, District C
AYES:	Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Lewis, Rivera-Malpiede, Sloan, Tisdale, Whitmore, Williams

Prepared by:
Carl Green Jr., Transit Equity Manager

Approved by:


Michael Ford, Chief Operations Officer 5/3/2022

Authorized by:


Debra A. Johnson, General Manager and CEO 5/5/2022

Attachment B

RTD Title VI Complaint Forms

Title VI Complaint Form



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

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202. You can reach our office Monday-Friday from 8-5 at 303-299-6000, or you can email our office at titlevicomplaints@rtd-denver.com.

1. Complainant's Name: _____
2. Address: _____
3. City: _____ State: _____ Zip Code: _____
4. Telephone No. (Home): _____ (Business): _____
5. Person discriminated against (if other than complainant)
Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
6. What was the discrimination based on? (Check all that apply)
☐ Race ☐ Color ☐ National Origin
7. Date of incident resulting in discrimination: _____
8. Describe how you were discriminated against. What happened and who was responsible?
For additional space, attach additional sheets of paper or use back of the form.
9. What RTD representatives were involved?
10. Where did the incident take place? Please provide location, bus number, drivers name, etc.

Title VI Complaint Form (page 2)



11. Witnesses? Please provide their contact information.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Numbers: (Home) _____ (Business): _____

Email: _____

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Numbers: (Home) _____ (Business): _____

Email: _____

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Numbers: (Home) _____ (Business): _____

Email: _____

12. Did you file this complaint with another federal, state, or local agency; or with a federal or state court?

(Check the appropriate space) ☐ Yes ☐ No

If answer is yes, check each agency complaint was filed with:

☐ Federal Agency ☐ Federal Court ☐ State Agency

☐ State Court ☐ Local Agency ☐ Other

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

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Date Filed: _____

Sign the complaint in space below. Attach any documents you believe supports your complaint.

Complainant's Signature

Signature Date

يجوز لأي شخص يعتقد أنه قد تم استبعاده من المشاركة في برامج دائرة وسائل النقل الإقليمية (RTD) أو أنشطتها أو خدماتها أو حرمانه من مزاياها بسبب التمييز على أساس العرق أو اللون أو الأصل القومي تقديم شكوى بموجب الباب 6 إلى دائرة وسائل النقل الإقليمية.

يجب تقديم الشكاوى في غضون 180 يومًا من تاريخ التعرض للتمييز المدعى به. وتسمح دائرة وسائل النقل الإقليمية باستخدام ممثل لتقديم أية شكوى بالنيابة عن المشتكي. سيتم إجراء كافة عمليات التواصل التي تلي الشكاوى مع ممثل المشتكي في المقام الأول ومع المشتكي بشكل ثانوي.

بمجرد تقديم أية شكوى، ستقوم دائرة وسائل النقل الإقليمية باستعراضها وتحديد ما إذا كانت منوطة باختصاص التحقيق فيها من عدمه. سيتلقى العميل خطاب إقرار يخطره بما إذا كان سيتم التحقيق في الشكاوى من قبل دائرة وسائل النقل الإقليمية من عدمه في غضون سبعة (7) أيام عمل من تاريخ تقديم الشكاوى. وما لم يتم تحديد فترة أطول من قبل دائرة وسائل النقل الإقليمية، سيكون أمام المشتكي عشرة (10) أيام من تاريخ ذلك الخطاب لإرسال المعلومات المطلوبة إلى محقق دائرة وسائل النقل الإقليمية المكلف بالقضية.

يجوز للمحقق مقابلة أي أفراد تم ذكرهم كشهود وأي أفراد آخرين قد تكون لديهم معلومات. إذا كانت هناك حاجة إلى الحصول على المزيد من المعلومات لحل القضية، فيجوز حينئذ لدائرة وسائل النقل الإقليمية الاتصال بالمشتكي أو الشاهد. في حال عدم استجابة المشتكي لمحقق دائرة وسائل النقل الإقليمية أو تزويده بالمعلومات الإضافية خلال الإطار الزمني المحدد، فقد تقوم دائرة وسائل النقل الإقليمية حينئذ بإغلاق القضية إداريًا. يمكن إغلاق القضية إداريًا أيضًا إذا لم تعد لدى المشتكي الرغبة في متابعة قصيته.

بصفة عامة، ستقوم دائرة وسائل النقل الإقليمية بإكمال التحقيق في غضون ستين (60) يومًا من استلامها نموذج الشكاوى المكتمل. وعلى الرغم من أن دائرة النقل الإقليمية تسعى جاهدة إلى البت في الشكاوى سريعًا، فإن هذه العملية ستتباين اعتمادًا على مدى تعقيد الشكاوى، والأفراد المتضمنين بها، وعوامل أخرى. بمجرد انتهاء التحقيق، سيتلقى المشتكي خطاب الرد النهائي على الشكاوى.

في حال لم يوافق المشتكي على قرار دائرة وسائل النقل الإقليمية، يجوز له حينئذ طلب إعادة النظر في القرار من خلال تقديمه طلب كتابي إلى مدير عدالة الحصول على خدمات وسائل النقل (Transit Equity Manager) لدى دائرة وسائل النقل الإقليمية في غضون سبعة (7) أيام بعد تاريخ خطاب دائرة وسائل النقل الإقليمية والذي يوضح فيه على وجه التحديد أساس إعادة النظر. سوف يقوم مدير عدالة الحصول على خدمات وسائل النقل بإخطار المشتكي بقراره الذي يكون إما قبول طلب إعادة النظر في غضون عشرة (10) أيام أو رفضه. في القضايا التي يُسمح فيها بإعادة النظر، سيصدر مدير عدالة الحصول على خدمات وسائل النقل خطابًا بالقرار النهائي إلى المشتكي عند الانتهاء من استعراض طلب إعادة النظر.

ينص الباب السادس من قانون الحقوق المدنية لسنة 1964 على أنه "يُحظر استبعاد أي شخص في الولايات المتحدة، على أساس العرق أو اللون أو الأصل القومي، من المشاركة في المزايا أو حرمانه منها أو تعرضه للتمييز". ضمن أي برنامج أو نشاط يتلقى مساعدة مالية فيدرالية

رجى تقديم المعلومات التالية اللازمة لمعالجة شكاوك. المساعدة متاحة عند الطلب. أكمل هذا النموذج وأرسله عبر البريد أو قم بتسليمه في العنوان التالي

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31,
Denver, CO 80202. أو 6000-299-303 على الرقم 5-8 الساعة من الجمعة إلى الاثنين إلى مكتبنا مع مكتبنا من الاثنين إلى الجمعة من الساعة 8-5 على الرقم 6000-299-303، أو titlevcomplaints@rtd-denver.com يمكنك إرسال رسالة عبر البريد الإلكتروني إلى مكتبنا على العنوان

1. اسم مقدم الشكوى: _____
2. العنوان: _____
3. المدينة: _____ الولاية: _____ الرمز البريدي: _____
4. رقم الهاتف (المنزل): _____ (العمل): _____
5. الشخص الممارس ضده التمييز (إذا كان شخصاً آخر خلاف مقدم الشكوى)
الاسم: _____
العنوان: _____
المدينة: _____ الولاية: _____ الرمز البريدي: _____
6. على أي أساس كان التمييز؟ (حدد كل ما ينطبق)
العرق ☐ اللون ☐ الأصل القومي ☐
7. تاريخ الحادث الذي أدى إلى التمييز: _____
8. صف كيف تعرضت للتمييز. ماذا حدث ومن المسؤول؟ لمساحة إضافية، أرفق أوراق إضافية في ظهر النموذج.
9. من هم الممثلون المتورطون من دائرة النقل الإقليمية؟
10. أين وقع الحادث؟ يرجى ذكر الموقع ورقم الحافلة واسم السائق وما إلى ذلك.

11. من هم الشهود؟ يُرجى ذكر معلومات الاتصال الخاصة بهم.

الاسم:

العنوان:

المدينة:

الولاية:

الرمز البريدي:

أرقام الهواتف: (المنزل)

(العمل):

البريد الإلكتروني:

الاسم:

العنوان:

المدينة:

الولاية:

الرمز البريدي:

أرقام الهواتف: (المنزل)

(العمل):

البريد الإلكتروني:

الاسم:

العنوان:

المدينة:

الولاية:

الرمز البريدي:

أرقام الهواتف: (المنزل)

(العمل):

البريد الإلكتروني:

12. هل قدمت هذه الشكوى إلى وكالة فيدرالية أو وكالة تابعة للولاية أو وكالة محلية أخرى؛ أو إلى محكمة فيدرالية أو محكمة تابعة للولاية؟

(قم بالتأشير على المكان المناسب) نعم ☐ لا ☐

إذا كانت الإجابة "نعم"، فقم بالتأشير على كل وكالة قدمت إليها الشكوى:

وكالة تابعة للولاية

☐

محكمة فيدرالية

☐

وكالة فيدرالية

☐

أخرى

☐

وكالة محلية

☐

محكمة تابعة للولاية

☐

13. قَدِّم معلومات جهة الاتصال لدى الوكالة التي قدمت إليها الشكوى أيضًا:

الاسم:

العنوان:

المدينة:

الولاية:

الرمز البريدي:

تاريخ تقديم الشكوى:

قم بالتوقيع على الشكوى في المساحة الواردة أدناه. وأرفق أية وثائق تعتقد أنها تدعم شكواك.

تاريخ التوقيع

توقيع مقدم الشكوى

በዘር፣ በቀለም ወይም በብሄራዊ ማንነት መነሻ በሚደርስ መድልዎ የተነሳ እሱ ወይም እሷ ከ RTD ፕሮግራሞች፣ ተግባራት ወይም አገልግሎቶች እንደተገለለ ወይም እንደተከለከለ የሚያምን ግለሰብ የርዕስ VI ቅሬታን ለ RTD ማቅረብ ይችላል።

ቅሬታው መድልዎ ከተፈፀመበት ቀን ጀምሮ ባሉት 180 ቀናት ውስጥ መቅረብ መቻል አለበት። RTD ቅሬታ አቅራቢውን ወኪሎ ቅሬታ ለማቅረብ ተወካይ መጠቀምን ይፈቅዳል። ከቅሬታ በኋላ የሚደረጉ ሁሉም ተግባቦቶች ለቅሬታ አቅራቢው ተወካይ በዋናነት እና በሁለተኛ ደረጃ ቅሬታ አቅራቢው ይመራሉ።

አንዴ ቅሬታ ከቀረበ በኋላ፣ RTD ቅሬታውን መርምሮ የዳኝነት ስልጣን እንዳለን ይወስናል። ቅሬታው ከቀረበበት ጊዜ ጀምሮ ባሉት ሰባት (7) የስራ ቀናት ውስጥ ደንበኛው ቅሬታው በ RTD ይጣራል እንደሆነ የሚገልጽ የእውቅና ደብዳቤ ይደርሳቸዋል። በRTD ረዘም ያለ ጊዜ ካልተገለፀ በቀር ቅሬታ አቅራቢው ደብዳቤው ከተፃፈበት ቀን ጀምሮ ለጉዳዩ ወደተመደበው የ RTD መርማሪ የተጠየቀውን መረጃ ለመላክ አስር (10) ቀናት ይኖረዋል።

መርማሪው በእማኝነት ከተጠቀሱት ግለሰቦች እና ሌሎች መረጃ ያላቸውን ግለሰቦች ቃለ መጠይቅ ማድረግ ይችላል። ጉዳዩን ለመፍታት ተጨማሪ መረጃ ካስፈለገ፣ RTD ቅሬታ አቅራቢውን ወይም እማኝ ማግኘት ይችላል። የ RTD መርማሪ በቅሬታ አቅራቢው ካልተገናኘ ወይም ተጨማሪ መረጃው በሚፈለገው የጊዜ ሰሌዳ ውስጥ ካልደረሰ፣ RTD ጉዳዩን በአስተዳደር ሊዘጋው ይችላል። ቅሬታ አቅራቢው ጉዳያቸውን ለመከታተል ካልፈለጉ ጉዳዩ በአስተዳደር ሊዘጋ ይችላል።

RTD በአጠቃላይ የተጠናቀቀ የቅሬታ ቅፅ በደረሰው በስልሳ (60) ቀናት ውስጥ ምርመራውን ያጠናቅቃል። RTD ቅሬታዎችን በአፋጣኝ ለመፍታት ቢጥር እንኳ፣ ይህ ሂደት እንደ ቅሬታው ውስብስብነት፣ በሚመለከታቸው ግለሰቦች እና ሌሎች ነገሮች ይለያያል። ምርመራው እንደተጠናቀቀ ቅሬታ አቅራቢው ለቅሬታው የመጨረሻ ምላሽ ደብዳቤ ይደርሰዋል።

ቅሬታ አቅራቢው በ RTD ውሳኔ ካልተሰማማ፣ የ RTD ደብዳቤ ከተፃፈበት ቀን በኋላ በሰባት (7) ቀናት ውስጥ ጥያቄን በፅሁፍ ለ የRTD Transit Equity ስራ አስኪያጅ በማቅረብ እንደገና እንዲታይ ያስፈለገበትን ምክንያት በመግለፅ እንደገና እንዲታይ ሊጠይቁ ይችላሉ። የTransit Equity ስራ አስኪያጅ ቅሬታ አቅራቢውን በድጋሚ የማጣራት ጥያቄን ለመቀበልም ሆነ ውድቅ ያደረገውን ውሳኔ በአስር (10) ቀናት ውስጥ ያሳውቃል። እንደገና እንዲታይ በሚደረግበት ጊዜ፣ የTransit Equity ሥራ አስኪያጁ በድጋሚ የማጣራት ግምገማው እንደተጠናቀቀ ለቅሬታ አቅራቢው የመወሰን ደብዳቤ ይሰጣል።

1964 የዜጎች መብቶች ህግ አርእስት ህገ “በዩናይትድ ስቴትስ ውስጥ ያለ ማንም ሰው በዘር፣ በቀለም ወይም በብሔራዊ ማንነት ሊገለል፣ ሊሳተፍ፣ ጥቅሞቹ ሊከለከል ወይም በማንኛውም ስር አድልዎ ሊደረግበት አይችልም። የፌዴራል የገንዘብ ድጋፍ የሚቀበል ፕሮግራም ወይም ተግባር።”

እባክዎ ቅሬታዎን ለማስኬድ የሚከተሉትን አስፈላጊ መረጃዎች ያቅርቡ። እርዳታ ሲጠየቅ ይገኛል። ይህንን ቅጽ ይሙሉ እና በፖስታ ይላኩ ወይም ወደዚህ ያቅርቡ።

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202. ከሰኞ - አርብ ከ 8 - 5 በ 303-299-6000 ወደ ቢሮአችን መድረስ ይችላሉ ወይም ወደ ጽ/ቤታችን በ titlevicomplaints@rtd-denver.com ኢሜል መላክ ይችላሉ ።

- የቅሬታ አቅራቢው ስም: _____
- አድራሻ: _____
- ከተማ: _____ ግዛት: _____ ዚፕ ኮድ: _____
- የስልክ ቁጥር (የቤት): _____ (የስራ): _____
- አድልዎ የተደረገበት ሰው (ቅሬታ አቅራቢ ካልሆነ በስተቀር)
ስም: _____
አድራሻ: _____
ከተማ: _____ ግዛት: _____ ዚፕ ኮድ: _____
- አድልዎ በምን ላይ የተመሰረተ ነበር? (የሚመለከትዎት ሁሉ ላይ ምልክት ያድርጉ)
☐ ብሔር ☐ ቀለም ☐ ብሔራዊ መሰረት
- መድልዎ ከስተት የተከሰተበት ቀን: _____
- እንዴት አድልዎ እንደተፈፀመብህ ግለጽ። ምን ተፈጠረ እና ተጠያቂው ማን ነበር? ለተጨማሪ ቦታ፣ ተጨማሪ የመጠቀሚያ ወረቀት ከቅጹ ጀርባ ያያይዙ።
- ምን የ RTD ተወካዮች ተሳትፈዋል?
- ከስተቱ የት ደረሰ? እባክዎን ቦታ፣ የአውቶቡስ ቁጥር፣ የአሽከርካሪዎች ስም፣ ወዘተ ያቅርቡ።

11. ምስክሮች? እባክዎን የመገኛ አድራሻቸውን ያቅርቡ።

ስም: _____

አድራሻ: _____

ከተማ: _____ ግዛት: _____ ዚፕ ኮድ: _____

የስልክ ቁጥሮች (የቤት) _____ (የስራ): _____

ኢሜይል: _____

ስም: _____

አድራሻ: _____

ከተማ: _____ ግዛት: _____ ዚፕ ኮድ: _____

የስልክ ቁጥሮች (የቤት) _____ (የስራ): _____

ኢሜይል: _____

ስም: _____

አድራሻ: _____

ከተማ: _____ ግዛት: _____ ዚፕ ኮድ: _____

የስልክ ቁጥሮች (የቤት) _____ (የስራ): _____

ኢሜይል: _____

12. ይህን ቅሬታ ለሌላ የፌዴራል፣ የክልል ወይም የአካባቢ ኤጀንሲ አቅርበዋል? ወይስ ከፌዴራል ወይም ከክልል ፍርድ ቤት ጋር? (ተገቢው ቦታ ላይ ምልክት ያድርጉ) ☐ አዎ ☐ አይ

መልሱ አዎ ከሆነ፣ እያንዳንዱ ኤጀንሲ ቅሬታ የቀረበበትን ያረጋግጡ፡

☐ የፌዴራል ኤጀንሲ

☐ የፌዴራል ፍርድ ቤት

☐ የክልል ኤጀንሲ

☐ የክልል ፍርድ ቤት

☐ የአካባቢ ኤጀንሲ

☐ ሌሎች

13. ቅሬታ ላቀረቡበት ኤጀንሲ የአድራሻ ሰው መረጃ ያቅርቡ፡

ስም: _____

አድራሻ: _____

ከተማ: _____ ግዛት: _____ ዚፕ ኮድ: _____

የተመዘገበበት ቀን: _____

ቅሬታውን ከታች ባለው ቦታ ይፈርሙ። ቅሬታዎን ይደግፋሉ ብለው የሚያምኑትን ማንኛውንም ሰነዶች ያያይዙ።

第六章投诉程序

任何人如果认为他/她由于种族、肤色或民族血统的歧视而被排除在 RTD 的计划、活动或服务之外，或被剥夺了受益权，可以向 RTD 提出第六章投诉。

投诉必须在被指控的歧视行为发生之日起 180 天内提出。RTD 允许通过一位代表来代表投诉人提出投诉。所有投诉后的沟通将主要针对投诉人的代表，其次是投诉人。

一旦提出投诉，RTD 将审查该投诉，并确定我们是否有管辖权。客户将收到一封确认信，通知他们该投诉是否会在投诉提出后的七（7）个工作日内由 RTD 进行调查。除非 RTD 规定了更长的时间，否则投诉人将有十（10）天的时间将所要求的信息发送给 RTD 分配给该案件的调查员。

调查员可以约谈任何作为证人的个人和任何其他可能拥有信息的个人。如果需要更多的信息来解决此案，RTD 可以联系投诉人或证人。如果 RTD 的调查员没有与投诉人联系，或没有在规定时间内收到额外的信息，RTD 可能会以行政方式结案。如果投诉人不再希望继续其案件，案件也可能被行政结案。

RTD 通常会在收到完整的投诉表后六十（60）天内完成调查。尽管 RTD 努力及时解决投诉，但这一过程将根据投诉的复杂性、涉及的个人和其他因素而有所不同。一旦调查结束，投诉人将收到一份对投诉的最终答复信。

如果投诉人不同意 RTD 的决定，他们可以在 RTD 信函日期后七（7）天内向 RTD 的交通公平经理提交书面请求，具体说明复议的依据，要求复议。交通公平经理将在十（10）天内通知投诉人他们接受或拒绝复议请求的决定。在批准复议的情况下，交通公平经理将在完成复议审查后向投诉人发出裁定书。

第VI款投诉表



《1964年民权法案》第VI款规定：“在美国接受联邦财政援助计划或活动中，任何人在不得因种族、肤色或原有国籍而被排除、不得参与或被拒绝获得相关福利，或者受到歧视。”

为处理您的相关投诉，请提供以下必要信息。我们可应要求提供相关帮助。请填写完成此表并邮寄或递送至：

Regional Transportation District, Transit Equity Office, 1660 Blake Street,
BLK-31, Denver, CO 80202。您可以拨打电话 303-299-6000，或者发送电邮至
titlevicomplaints@rtd-denver.com 联系我们办公室；时间：周一 - 周五，8点-5点。

1. 投诉人姓名： _____
2. 地址： _____
3. 城市： _____ 州： _____ 邮编： _____
4. 电话号码（家庭）： _____ （公司）： _____
5. 受歧视人员（如果并非投诉人）
姓名： _____
地址： _____
城市： _____ 州： _____ 邮编： _____
6. 哪方面受到歧视？（请勾选所有适合项）
☐ 种族 ☐ 肤色 ☐ 原有国籍
7. 歧视事件发生日期： _____
8. 请描述您如何受到歧视。发生事件以及何人责任？如需更多空间，请在表格背面附上额外纸张。
9. 涉及哪些RTD代表？
10. 事件发生地点？请提供相关位置、公交车号码、司机姓名等。

第IV款投诉表（第2页）



11. 是否有见证人？请提供其联系方式。

姓名: _____

地址: _____

城市: _____ 州: _____ 邮编: _____

电话号码: (家庭) _____ (公司): _____

电子邮件: _____

姓名: _____

地址: _____

城市: _____ 州: _____ 邮编: _____

电话号码: (家庭) _____ (公司): _____

电子邮件: _____

姓名: _____

地址: _____

城市: _____ 州: _____ 邮编: _____

电话号码: (家庭) _____ (公司): _____

电子邮件: _____

12. 您是否已将此投诉提交至其他联邦、州或地方机构；或者联邦或州法院？

(请查看是否有足够空间) ☐ 是 ☐ 否

如果“是”，请勾选每个提交机构：

☐ 联邦机构

☐ 联邦法院

☐ 州机构

☐ 州法院

☐ 地方机构

☐ 其他

13. 请提供其他投诉提交机构的联系人信息：

姓名: _____

地址: _____

城市: _____ 州: _____ 邮编: _____

提交日期: _____

投诉人请在下方空白处签名。请随附此投诉的任何支持性文件。

投诉人签名

签名日期

Toute personne qui pense avoir été exclue de la participation aux programmes, activités ou services de RTD ou s'être vu refuser les avantages de ces derniers en raison d'une discrimination fondée sur la race, la couleur ou l'origine nationale peut porter une plainte au titre VI auprès de RTD.

La plainte doit être déposée dans les 180 jours suivant la date de la discrimination présumée. RTD permet le recours à un représentant pour déposer une plainte au nom du plaignant. Toute communication faisant suite à la plainte sera adressée au représentant du plaignant en premier lieu et au plaignant en second lieu.

Une fois qu'une plainte est déposée, RTD l'examinera et déterminera si on est compétent. Le client recevra un accusé de réception l'informant que la plainte fera l'objet d'une enquête par RTD dans un délai de sept (7) jours ouvrables à compter de la date de dépôt de la plainte. Sauf si un délai plus long est spécifié par RTD, le plaignant disposera de dix (10) jours à compter de la date de la lettre pour envoyer les informations demandées à l'enquêteur de RTD affecté à l'affaire.

L'enquêteur peut interroger les personnes citées comme témoins et toute autre personne ayant des informations. Si des informations supplémentaires sont nécessaires pour résoudre le cas, RTD peut contacter à la fois le plaignant et le témoin. Si l'enquêteur de RTD n'est pas contacté par le plaignant ou ne reçoit pas les informations supplémentaires dans les délais requis, RTD peut clôturer administrativement l'affaire. Cette dernière peut également être classée administrativement si le plaignant n'est plus intéressé à donner suite à l'affaire.

RTD mènera généralement une enquête dans les soixante (60) jours suivant la réception d'un formulaire de plainte dûment rempli. Bien que RTD s'efforce de résoudre rapidement les plaintes, ce processus varie selon la complexité de la plainte, les personnes impliquées et d'autres facteurs. Une fois l'enquête terminée, le plaignant recevra une lettre de réponse finale à sa plainte.

Si un plaignant n'est pas d'accord avec la décision de RTD, il peut demander un réexamen en soumettant une demande par écrit au responsable de l'équité dans le transport en commun de RTD dans les sept (7) jours suivant la date de la lettre de RTD, en indiquant de manière spécifique la base du réexamen. Le responsable de l'équité dans le transport en commun informera le plaignant de sa décision d'accepter ou de rejeter la demande de réexamen dans les dix (10) jours. Dans les cas où le réexamen est accordé, le responsable de l'équité en matière de transport (Transit Equity Manager) en commun enverra une lettre de détermination au plaignant à la fin de l'examen du réexamen.

Titre VI - Formulaire de plainte



En vertu du Titre VI de la Convention sur les Droits Civils de 1964, "Personne aux États-Unis ne sera, pour des raisons de race, de couleur ou d'origine nationale, exclu de la participation à tout programme ou activité bénéficiant d'une aide financière fédérale, ne se verra refuser les avantages de ce programme ou activité, ni ne sera soumis à une discrimination".

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202. You can reach our office Monday-Friday from 8-5 at 303-299-6000, or you can email our office at titlevicomplaints@rtd-denver.com.

1. Nom du Plaignant : _____
2. Adresse : _____
3. Ville : _____ État : _____ Code Postal : _____
4. Numéro de Téléphone (Domicile) : _____ (Entreprise) : _____
5. Personne faisant l'objet d'une discrimination (si autre que le plaignant)
Nom : _____
Adresse : _____
Ville : _____ État : _____ Code Postal : _____
6. En quoi consisterait la discrimination ? (Cochez tout ce qui s'applique)
☐ Course ☐ Couleur ☐ L'origine nationale
7. Date de l'incident entraînant la discrimination : _____
8. Veuillez décrire comment vous avez été discriminé(e). Que s'est-il passé et qui est responsable ? Pour plus d'espace, veuillez annexer des feuilles supplémentaires au verso du formulaire.
9. Quels représentants de la RTD ont été impliqués ? _____
10. Où l'incident a-t-il eu lieu ? Veuillez indiquer le lieu, le numéro du bus, le nom du conducteur, etc. _____

Titre VI - Formulaire de Plainte (page 2)



11. Témoins ? Veuillez fournir leurs coordonnées.

Nom : _____

Adresse : _____

Ville : _____ État : _____ Code Postal : _____

Numéros de Téléphone : (Domicile) _____ (Entreprise) : _____

E-mail : _____

Nom : _____

Adresse : _____

Ville : _____ État : _____ Code Postal : _____

Numéros de Téléphone : (Domicile) _____ (Entreprise) : _____

E-mail : _____

Nom : _____

Adresse : _____

Ville : _____ État : _____ Code Postal : _____

Numéros de Téléphone : (Domicile) _____ (Entreprise) : _____

E-mail : _____

12. Est-ce que vous avez adressé cette plainte à un autre organisme fédéral, étatique ou local, ou à un tribunal fédéral ou étatique ? (Cochez la case correspondante) ___ Oui ___ Non

Dans ce cas, cochez chaque organisme auprès duquel la plainte a été déposée :

☐ Organisme Fédéral

☐ Tribunal Fédéral

☐ Agence d'Etat

☐ Tribunal d'État

☐ Agence Locale

☐ Autre

13. Veuillez fournir les coordonnées de la personne de contact de l'agence auprès de laquelle vous avez également enregistré la plainte :

Nom : _____

Adresse : _____

Ville : _____ État : _____ Zip Code: _____

Numéros de Téléphone : (Domicile) _____ (Entreprise) : _____

Date d'enregistrement : _____

Veuillez signer la plainte dans l'espace ci-dessous. Veuillez annexer tout document qui, selon vous, appuie votre plainte.

Signature du plaignant

Date de signature

Wenn jemand glaubt, aufgrund einer Diskriminierung wegen Rasse, Hautfarbe oder Nationalität von der Teilnahme an den Programmen, Aktivitäten oder Diensten von RTD ausgeschlossen worden zu sein bzw. dass ihm oder ihr Leistungen oder Vorteile vorenthalten wurden, kann die betreffende Person eine Beschwerde gemäß Titel IV des Unionsrechts an RTD richten.

Die Beschwerde muss vor Ablauf von 180 Tagen ab dem Zeitpunkt der geltend gemachten Diskriminierung vorgebracht werden. RTD räumt die Möglichkeit ein, dass die Beschwerde im Namen des Beschwerdeführers von einem Vertreter vorgebracht wird. Die gesamte Kommunikation nach dem Vorbringen einer Beschwerde erfolgt dann im Weiteren in erster Linie mit dem Vertreter und nur sekundär mit dem Beschwerdeführer.

Sobald eine Beschwerde vorgebracht wurde, prüft RTD diese und ermittelt, ob die Zuständigkeit dafür bei uns liegt. Der Kunde wird anhand eines Bestätigungsschreibens informiert, ob die Beschwerde innerhalb von sieben (7) Geschäftstagen ab dem Datum ihres Vorbringens von RTD untersucht wird. Sofern von RTD kein längerer Zeitraum festgelegt wird, hat der Beschwerdeführer ab dem Datum, zu dem er dazu aufgefordert wurde, zehn (10) Tage Zeit, um dem mit dem Fall betrauten Ermittler die von diesem angeforderten Informationen zukommen zu lassen.

Der Ermittler kann jegliche Personen befragen, die als Zeugen genannt werden, sowie jede sonstige Person, die über Informationen verfügt. Wenn zur Klärung des Falls weitere Informationen erforderlich sind, kann RTD den Beschwerdeführer oder die Zeugen kontaktieren. Wenn der RTD-Ermittler vom Beschwerdeführer innerhalb der vorgegebenen Frist nicht kontaktiert wird oder die angeforderten Informationen nicht erhält, kann RTD den Fall schließen und zu den Akten legen. Ein Fall kann auch dann administrativ geschlossen werden, wenn der Beschwerdeführer wünscht, dass die Angelegenheit nicht weiter verfolgt wird.

RTD schließt solcherlei Untersuchungen in der Regel innerhalb von sechzig (60) Tagen ab Eingang des ausgefüllten Beschwerdeformulars ab. Zwar bemüht sich RTD stets um eine zügige Bearbeitung von Beschwerden, doch hängt die Dauer des Prozesses auch von der Komplexität des Falls ab, von den involvierten Personen sowie von weiteren Faktoren. Sobald die Untersuchung abgeschlossen ist, erhält der Beschwerdeführer ein abschließendes Antwortschreiben.

Wenn der Beschwerdeführer mit RTDs Bescheid nicht einverstanden ist, können sie eine Wiederaufnahme des Falls anfordern. Dies hat vor Ablauf von sieben (7) Tagen nach Erhalt des RTD-Antwortschreibens schriftlich an RTDs Transit-Equity-Manager zu erfolgen. Dabei ist dafür ist der Grund für den Wunsch nach einer Neubewertung anzugeben. Der Transit-Equity-Manager informiert den Beschwerdeführer dann innerhalb von zehn (10) Tagen von seiner Entscheidung, den Antrag auf Wiederaufnahme anzunehmen oder abzulehnen. Wenn die Wiederaufnahme gewährt wird, informiert der Transit-Equity-Manager den Beschwerdeführer schriftlich über das Ergebnis der abgeschlossenen Überprüfung.

Titel-VI-Beschwerdeformular



In Titel VI des Civil Rights Act von 1964 heißt es: “Niemand in den Vereinigten Staaten darf aufgrund seiner Rasse, Hautfarbe oder nationalen Herkunft von der Teilnahme an einem Programm oder einer Aktivität, das/die finanzielle Unterstützung durch den Bund erhält, ausgeschlossen werden, ihm/ihr dürfen die Vorteile verweigert werden, oder er/sie darf einer Diskriminierung ausgesetzt werden.”

Bitte geben Sie die folgenden Informationen an, die für die Bearbeitung Ihrer Beschwerde erforderlich sind. Unterstützung ist auf Anfrage erhältlich. Füllen Sie dieses Formular aus und senden Sie es per Post oder geben Sie es ab an:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202. Sie können unser Büro von Montag bis Freitag von 8 bis 17 Uhr unter 303-299-6000 erreichen, oder Sie können eine E-Mail an titlevicomplaints@rtd-denver.com senden.

1. Name des Beschwerdeführers: _____
2. Adresse: _____
3. Ort: _____ Staat: _____ Postleitzahl: _____
4. Telefon (privat): _____ (Geschäftlich): _____
5. Person, die diskriminiert wurde (falls nicht mit dem Beschwerdeführer identisch)
Name: _____
Adresse: _____
Ort: _____ Staat: _____ Postleitzahl: _____
6. Worauf beruhte die Diskriminierung? (Kreuzen Sie alles an, was zutrifft)
☐ Rasse ☐ Hautfarbe ☐ Nationale Herkunft
7. Datum des Vorfalls, der zur Diskriminierung führte: _____
8. Beschreiben Sie, wie Sie diskriminiert wurden. Was ist passiert und wer war dafür verantwortlich? Wenn Sie zusätzlichen Platz benötigen, fügen Sie weitere Blätter auf der Rückseite des Formulars ein.
9. Welche FTE-Vertreter waren beteiligt?
10. Wo hat sich der Vorfall ereignet? Bitte geben Sie Ort, Busnummer, Name des Fahrers usw. an.

11. Zeugen? Bitte geben Sie deren Kontaktinformationen an.

Name: _____

Adresse: _____

Ort: _____ Staat: _____ Postleitzahl: _____

Telefonnummern: (Privat) _____ (Geschäftlich): _____

Email: _____

Name: _____

Adresse: _____

Ort: _____ Staat: _____ Postleitzahl: _____

Telefonnummern: (Privat) _____ (Geschäftlich): _____

Email: _____

Name: _____

Adresse: _____

Ort: _____ Staat: _____ Postleitzahl: _____

Telefonnummern: (Privat) _____ (Geschäftlich): _____

Email: _____

12. Haben Sie diese Beschwerde bei einer anderen Bundes-, Landes- oder Kommunalbehörde oder bei einem Bundes- oder Landesgericht eingereicht?

(Kreuzen Sie das entsprechende Feld an) _____ Ja _____ Nein

Wenn ja, kreuzen Sie jede Behörde an, bei der die Beschwerde eingereicht wurde:

- | | | |
|--|--|---|
| <input type="checkbox"/> Bundesbehörde | <input type="checkbox"/> Bundesgerichtshof | <input type="checkbox"/> Staatliche Behörde |
| <input type="checkbox"/> Staatliches Gericht | <input type="checkbox"/> Örtliche Behörde | <input type="checkbox"/> Andere |

13. Geben Sie die Kontaktdaten der Behörde an, bei der Sie die Beschwerde ebenfalls eingereicht haben:

Name: _____

Adresse: _____

Ort: _____ Staat: _____ Postleitzahl: _____

Datum der Einreichung: _____

Unterschreiben Sie die Beschwerde in dem Feld unten. Fügen Sie alle Dokumente bei, die Ihrer Meinung nach Ihre Beschwerde unterstützen.

Unterschrift des Beschwerdeführers

Unterschrift Datum

कोई भी व्यक्ति जो मानता है कि उसे जाति, रंग या राष्ट्रीय मूल के आधार पर भेदभाव के कारण RTD के कार्यक्रमों, गतिविधियों या सेवाओं में भाग लेने से बाहर रखा गया है या लाभ से वंचित किया गया है, वह RTD में शीर्षक VI शिकायत दर्ज कर सकता है।

शिकायत कथित भेदभाव की तारीख से 180 दिनों के भीतर दर्ज की जानी चाहिए। RTD शिकायतकर्ता की ओर से शिकायत दर्ज करने के लिए एक प्रतिनिधि के उपयोग की अनुमति देता है। शिकायत के बाद सभी संचार शिकायतकर्ता के प्रतिनिधि को प्राथमिक रूप से और शिकायतकर्ता को द्वितीयक रूप से निर्देशित किया जाएगा।

एक बार शिकायत दर्ज होने के बाद, RTD शिकायत की समीक्षा करेगा और निर्धारित करेगा कि हमारे पास अधिकार क्षेत्र है या नहीं। ग्राहक को एक पावती पत्र प्राप्त होगा जिसमें उन्हें सूचित किया जाएगा कि शिकायत दर्ज होने के सात (7) व्यावसायिक दिनों के भीतर RTD द्वारा शिकायत की जांच की जाएगी या नहीं। जब तक RTD द्वारा लंबी अवधि निर्दिष्ट नहीं की जाती है, शिकायतकर्ता के पास मामले को सौंपे गए RTD अन्वेषक को अनुरोधित जानकारी भेजने के लिए पत्र की तारीख से दस (10) दिन होंगे।

अन्वेषक गवाह के रूप में नामित किसी भी व्यक्ति और जानकारी रखने वाले किसी भी अन्य व्यक्ति का साक्षात्कार कर सकता है। यदि मामले को सुलझाने के लिए अधिक जानकारी की आवश्यकता है, तो RTD शिकायतकर्ता या गवाह से संपर्क कर सकता है। यदि शिकायतकर्ता द्वारा RTD के अन्वेषक से संपर्क नहीं किया जाता है या आवश्यक समय सीमा के भीतर अतिरिक्त जानकारी प्राप्त नहीं होती है, तो RTD प्रशासनिक रूप से मामले को बंद कर सकता है। यदि शिकायतकर्ता अब अपने मामले को आगे नहीं बढ़ाना चाहता है तो मामला प्रशासनिक रूप से बंद भी किया जा सकता है।

RTD आम तौर पर एक भरे हुए शिकायत फॉर्म की प्राप्ति से साठ (60) दिनों के भीतर एक जांच पूरी करेगा। हालांकि RTD शिकायतों को तुरंत हल करने का प्रयास करता है, यह प्रक्रिया शिकायत की जटिलता, इसमें शामिल व्यक्तियों और अन्य कारकों के आधार पर भिन्न होगी। एक बार जांच समाप्त हो जाने के बाद, शिकायतकर्ता को शिकायत पर अंतिम प्रतिक्रिया पत्र प्राप्त होगा।

यदि कोई शिकायतकर्ता RTD के निर्धारण से असहमत है, तो वो RTD के पत्र की तारीख के सात (7) दिनों के भीतर RTD के ट्रांजिट इक्विटी प्रबंधक को लिखित रूप में अनुरोध प्रस्तुत करके पुनर्विचार का अनुरोध कर सकते हैं, जिसमें विशिष्टता के साथ पुनर्विचार का आधार बताया गया है। ट्रांजिट इक्विटी प्रबंधक शिकायतकर्ता को दस (10) दिनों के भीतर पुनर्विचार के अनुरोध को स्वीकार या अस्वीकार करने के उनके निर्णय के बारे में सूचित करेगा। जिन मामलों में पुनर्विचार की अनुमति दी जाती है, ट्रांजिट इक्विटी प्रबंधक पुनर्विचार समीक्षा के पूरा होने पर शिकायतकर्ता को एक निर्धारण पत्र जारी करेगा।

1964 के नागरिक अधिकार अधिनियम के शीर्षक VI में कहा गया है, "संयुक्त राज्य में किसी भी व्यक्ति को उसके नस्ल, रंग या राष्ट्रीयता के आधार पर संघीय वित्तीय सहायता प्राप्त करने वाले किसी भी कार्यक्रम या गतिविधि में भाग लेने से न मना किया जाएगा, न किसी प्रकार के लाभों से वंचित रखा जाएगा, या न ही भेदभाव किया जाएगा।"

कृपया अपनी शिकायत पर कार्यवाही करने के लिए आवश्यक निम्नलिखित जानकारी प्रदान करें। अनुरोध पर सहायता उपलब्ध है। इस फॉर्म को पूरा करें और मेल करें या डिलीवर करें:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202। आप हमारे कार्यालय पर सोमवार-शुक्रवार 8-5 से 303-299-6000 पर संपर्क सकते हैं, या आप हमारे कार्यालय पर titlevicomplaints@rtd-denver.com पर ईमेल कर सकते हैं।

1. शिकायतकर्ता का नाम: _____
2. पता: _____
3. शहर: _____ राज्य: _____ ज़िप कोड: _____
4. टेलीफोन नंबर (घर): _____ (व्यवसाय): _____
5. व्यक्ति के साथ भेदभाव किया गया (यदि शिकायतकर्ता के अलावा अन्य)
नाम: _____
पता: _____
शहर: _____ राज्य: _____ ज़िप कोड: _____
6. भेदभाव किस पर आधारित था? (लागू होने वाले सभी को जाँचे)
____ जाति ____ रंग ____ राष्ट्रीयता
7. घटना की तारीख जिसके परिणामस्वरूप भेदभाव हुआ: _____
8. वर्णन करें कि आपके साथ किस प्रकार से भेदभाव किया गया। क्या हुआ था और कौन जिम्मेदार हैं? अतिरिक्त जगह के लिए, कागज की अतिरिक्त शीट संलग्न करें या फॉर्म के पीछे की जगह का उपयोग करें।
9. कौन से आरटीडी प्रतिनिधि शामिल थे?
10. घटना कहाँ हुई थी? कृपया स्थान, बस नंबर, ड्राइवर का नाम, आदि प्रदान करें।

11. गवाह? कृपया उनकी संपर्क जानकारी प्रदान करें।

नाम: _____
 पता: _____
 शहर: _____ राज्य: _____ ज़िप कोड: _____
 टेलीफोन नंबर: (घर) _____ (व्यवसाय): _____
 ईमेल: _____

नाम: _____
 पता: _____
 शहर: _____ राज्य: _____ ज़िप कोड: _____
 टेलीफोन नंबर: (घर) _____ (व्यवसाय): _____
 ईमेल: _____

नाम: _____
 पता: _____
 शहर: _____ राज्य: _____ ज़िप कोड: _____
 टेलीफोन नंबर: (घर) _____ (व्यवसाय): _____
 ईमेल: _____

12. क्या आपने यह शिकायत किसी अन्य संघीय, राज्य या स्थानीय एजेंसी के पास दर्ज कराई है; या एक संघीय या राज्य अदालत के साथ?

(उपयुक्त स्थान की जाँच करें) _____हाँ _____नहीं

यदि उत्तर हाँ है, तो जांच लें कि प्रत्येक एजेंसी की शिकायत निम्नलिखित के साथ दर्ज की गई थी:

- | | | |
|---|---|---------------------------------------|
| <input type="checkbox"/> संघीय संस्था | <input type="checkbox"/> संघीय न्यायालय | <input type="checkbox"/> राज्य संस्था |
| <input type="checkbox"/> राज्य न्यायालय | <input type="checkbox"/> स्थानीय एजेंसी | <input type="checkbox"/> अन्य |

13. जिस एजेंसी के साथ आपने शिकायत दर्ज की है, उसके लिए संपर्क व्यक्ति की जानकारी प्रदान करें:

नाम: _____
 पता: _____
 शहर: _____ राज्य: _____ ज़िप कोड: _____
 दायर की जाने की तारीख: _____

नीचे दिए गए स्थान पर शिकायत पर हस्ताक्षर करें। कोई भी ऐसा दस्तावेज़ संलग्न करें जो आपको लगता है कि आपकी शिकायत का समर्थन करता है।

शिकायतकर्ता के हस्ताक्षर

हस्ताक्षर तिथि

Txhua tus neeg uas ntseeg hais tias nws tau raug cais tawm los ntawm kev koom nrog los sis tsis pub kom tau txais cov txiaj ntsig ntawm RTD cov khoos kas, cov kev ua dej num ub no, los sis cov kev pab cuam vim yog muaj kev ntub ntawg uas yog saib raws haiv neeg, xim tawv nqaij los sis lub teb chaws yug yuav tuaj yeem ua daim ntawv tsis txaus siab raws Title VI mus rau RTD tau.

Yuav tsum ua daim ntawv hais qhov kev tsis txaus siab tsis pub dhau 180 hnub txij li hnub uas raug iab liam tias muaj kev ntub ntawg. RTD tso cai siv tus neeg sawv cev los ua daim ntawv tsis txaus siab sawv cev tam rau tus neeg tsis txaus siab. Txhua yam kev sib txuas lus tom qab ua daim ntawv tsis txaus siab lawm yuav yog txuas ncaj qha mus rau tus neeg tsis txaus siab tus neeg sawv cev ua ntej tshaj plaws thiab yuav txuas mus rau tus neeg tsis txaus siab ua tus tom qab me ntsis.

Thaumua daim ntawv tsis txaus siab lawm, RTD yuav tshuaj xyuas qhov kev tsis txaus siab thiab txiaj txim xyuas seb peb puas muaj cai txiaj txim. Tus neeg ntawd yuav tau txais tsab ntawv lees paub uas yuav qhia rau lawv paub tias seb qhov kev tsis txaus siab puas yuav raug tshawb xyuas los ntawm RTD nyob rau hauv sij hawm xya (7) hnub ua hauj lwm txij li hnub tau ua daim ntawv tsis txaus siab. Tus neeg tsis txaus siab yuav muaj sij hawm kaum (10) hnub txij li hnub tau txais tsab ntawv no txhawm rau xa cov ntaub ntawv thov uas thov tuaj mus rau RTD tus kws tshawb xyuas uas yog tus raug teeb tsa los lis rooj plaub no, tshwj kiag tias yog RTD tau teev lub sij hawm ntev dua li hais los no lawm xwb.

Tej zaum tus kws tshawb xyuas yuav xam phaj cov neeg uas muaj npe ua pov thawj thiab tah nrho lwm tus neeg uas ntub li yuav paub txog qhov teeb meem no. Yog tais tseem xav tau cov ntaub ntawv ntau ntub txhawm rau los daws qhov teeb meem no, ces RTD yuav tiv tauj tus neeg tsis txaus siab los sis tus neeg ua pov thawj. Yog tias tus neeg tsis txaus siab tsis tiv tauj los sis tsis xa cov ntaub ntawv ntau ntub mus rau RTD tus kws tshawb xyuas raws lub sij hawm uas teev tseg, ces RTD yuav muab qhov teeb meem no xaus tseg. Tsis tas li xwb, qhov teeb meem no kuj yuav tseem yuav raug xaus tseg yog tias tus neeg tsis txaus siab tsis xav hais txuas mus ntub lawm.

Feem ntau, RTD yuav ua kom tiav qhov kev tshawb xyuas nyob rau hauv sij hawm rau kaum (60) hnub txij li hnub tau txais daim ntawv tsis txaus siab uas sau tiav log lawm. Txawm hais tias RTD yuav ua tiag siv zog los daws qhov kev tsis txaus siab kom sai-sai tam siv los xij, tus txheej txheem no yuav sib txawv uas yog nce rau ntawm qhov nyuaj ntawm qhov kev tsis txaus siab, cov neeg uas muaj feem xyuam, thiab lwm yam. Thaum qhov kev tshawb xyuas tiav lawm, tus neeg tsis txaus siab yuav tau txais tsab ntawv teb zaum kawg rau qhov kev tsis txaus siab.

Yog tias tus neeg tsis txaus siab tsis pom zoo rau RTD qhov kev txiaj txim siab, ces lawv tuaj yeem thov kom rov txiaj txim dua los ntawm kev xa ib tsab ntawv thov mus rau RTD Tus Thawj Saib Xyuas Kev Ncaj Ncees Rau Kev Hloov Pauv (Transit Equity Manager) nyob rau sij hawm xya (7) hnub tom qab hnub tau txais RTD tsab ntawv, uas yog yuav tsum tau piav qhia txog qhov laj thawj tshwj xeeb kom rov txiaj txim dua. Tus Thawj Saib Xyuas Kev Ncaj Ncees Rau Kev Hloov Pauv (Transit Equity Manager) yuav ceeb toom rau tus neeg tsis txaus siab txog lawv qhov kev txiaj txim siab tsis hais lawv yuav lees txais los sis tsis lees txais qhov kev thov rov txiaj txim dua nyob rau hauv sij hawm kaum (10) hnub. Yog tias thaum tau txais kev tso cai rov txiaj txim dua lawm, ces Tus Thawj Saib Xyuas Kev Ncaj Ncees Rau Kev Hloov Pauv (Transit Equity Manager) yuav tawm tsab ntawv txiaj txim mus rau tus neeg tsis txaus siab thaum ua tiav qhov kev rov txiaj txim dua lawm.

Tshooj VI Daim Foos Tsis Txaus Siab



Tshooj VI txog Txoj Cai Pej Xeem xyoo 1964 hais txog “Tsis muaj tus neeg twg hauv teb chaws Meskas yuav, vim qhov cais haiv, cev nqaij daim tawv los sis lub teb chaws yug, raug tshem tawm, koom nrog, tsis lees txiaj ntsig los sis raug xaiv raws lus khoos kas los sis tau txais kev pab ntawm tsoom fvv.”

Thov muab cov ntaub ntawv xav tau rau koj cov ntawv tsis pom zoo. Yuav txhawb nga raws kev thov. Ua kom tiav daim foos no thiab mail los sis xa rau:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202.
Koj tuaj yeem mus rau ntawm peb chaw hauj lwm rau hnuv Monday-Friday suav txij 8-5 hu rau tus xov tooj 303-299-6000, los sis xa email rau peb chaw hauj lwm rau titlevicomplaints@rtd-denver.com.

1. Tus tsis txaus siab Lub Npe: _____
2. Chaw Nyob: _____
3. Lub Nroog: _____ Lub Lav: _____ Tus Zauv Zip: _____
4. Naj Npawb Xov Tooj. (Hauv tsev): _____
5. Tus neeg raug cais haiv (yog tias yog tus neeg tsis txaus siab)
Lub Npe: _____
Chaw Nyob: _____
Lub Nroog: _____ Lub Lav: _____ Tus Zauv Zip: _____
6. Kev cais haiv yog ua los ntawm qhov twg? (Ntsuam xyuas txhua qhov uas tau thov)
___ Haiv Neeg ___ Cev Nqaij Daim Tawv ___ Lub Teb Chaws Yug
7. Hnuv tim qhov xwm txheej uas muaj kev ntxub ntxaug: _____
8. Piav seb koj raug kev ntxub ntxaug li cas. Dab tsi tau tshwm sim thiab leej twg yog tus lav? Txhawm kom muaj qhov khoom, thov muab cov ntaub ntawv muaj npe sab nraum daim foos mus nroog.
9. Tus sawv cev RTD muaj feem cuam tshuam li cas?
10. Xwm txheej tshwm sim nyob qhov twg? Thov qhia paub qhov chaw, daim paib tsheb, tus tsav tsheb, lwm yam ntxiv.

Tshooj VI Daim Foos Tsis Txaus Siab (nplooj 2)



11. Pov thawj? Qhov qhia lawv cov ntaub ntawv tiv toj.

Lub Npe: _____
Chaw Nyob: _____
Lub Nroog: _____ Lub Lav: _____ Tus Zauv Zip: _____
Naj Npawb Xov Tooj: (Hauv Tsev) _____ (Chaw Hauj Lwm): _____
Email: _____

Lub Npe: _____
Chaw Nyob: _____
Lub Nroog: _____ Lub Lav: _____ Tus Zauv Zip: _____
Naj Npawb Xov Tooj: (Hauv Tsev) _____ (Chaw Hauj Lwm): _____
Email: _____

Lub Npe: _____
Chaw Nyob: _____
Lub Nroog: _____ Lub Lav: _____ Tus Zauv Zip: _____
Naj Npawb Xov Tooj: (Hauv Tsev) _____ (Chaw Hauj Lwm): _____
Email: _____

12. Koj puas tau xa daim ntawv tsis txaus siab no rau lwm lub lav los sis lwm qhov chaw sawv cev; los sis nrog rau tsoom fwm los sis tsev hais plauv hauv lub lav?

(Ntsuam saib qhov chaw uas tsim nyog) _____ Yog _____ Tsis yog _____

Yog teb tias yog, ntsuam saib txhua lub chaw hauj lwm koj tau xa daim ntawv tsis txaus siab rau:

___ Chaw Hauj Lwm Sawv Cev Tsoom Fwm ___ Tsev hais Plaub Ntawm Tsoom Fwm ___ Chaw Hauj Lwm Sawv Cev Hauv Lub Lav
___ Tsev Hais Plaub Hauv Lub Lav ___ Chaw Hauj Lwm Ntawm Zej Zog ___ Lwm qhov chaw

13. Thov muab tus neeg tiv toj ntawm qhov chaw hauj lwm uas koj tau xa ntawv tsis txaus siab rau:

Lub Npe: _____
Chaw Nyob: _____
Lub Nroog: _____ Lub Lav: _____ Tus Zauv Zip: _____
Xa Hnub Tim: _____

Kos npe rau daim ntawv tsis txaus siab rau qhov seem hauv qab. Muab txhua cov ntaub ntawv koj ntseeg tias yuav pab tau koj qhov kev tsis txaus siab nrog mus.

Tus Tsis Txaus Siab Kos Npe

Hnub Tim Kos Npe

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苦情は、差別の疑いのあった日から**180日以内**に申し立てられなければなりません。RTDは、代理人を利用して、申立人の代理として苦情を申し立てることを許可しています。苦情の後のすべての連絡は、第一に申立人の代理人に、第二に申立人に向けられます。

苦情が申し立てられると、RTDは苦情の内容を確認して当社が管轄権を有するかどうかを判断します。苦情が提出されてから**7営業日以内**に、RTDが苦情を調査するかどうかを通知する確認書が送付されます。RTDがこれより長い期間を指定しない限り、申立人は、確認書の日付から**10日以内**に、要求された情報を本件担当のRTD調査官に提出する必要があります。

調査官は、証人として指名された個人、および情報を持っている可能性のあるその他の個人と面談することがあります。本件の解決にさらに情報が必要な場合、RTDは申立人または証人に連絡することがあります。RTDの調査官は、申立人から連絡が無い、あるいは要求した期限内に追加情報が提供されない場合、管理上の理由において本件を終了させることができます。申立人が本件の追及を望まなくなった場合も、管理上終了されることがあります。

RTDは通常、記入済みの苦情申立書を受領してから、**60日以内**に調査を完了します。RTDは苦情の迅速な解決に努めますが、このプロセスは、苦情の複雑さの度合い、関係者、その他の要因によって異なります。調査が終了すると、苦情申立人に苦情に対する最終回答書が送付されます。

RTDの決定を不服とする場合、苦情申立人はRTDの確認書の日付から**7日以内**に、RTDのトランジットエクイティマネージャーに、再検討の根拠を具体的に述べた書面を提出することにより、再検討を求めることができます。トランジットエクイティマネージャーは、**10日以内**に再検討要請の受理または不受理の決定を申立人に通知します。再検討が受理された場合、トランジットエクイティマネージャーは、再検討の終了後、申立人に決定通知書を発行します。

1964年公民権法のタイトルVIには、「米国内のいかなる者も、人種、肌の色、国籍などを理由に、連邦政府の財政援助を受けるいかなるプログラムまたは活動からも排除されたり、参加できなかったり、その恩恵を受けられなかったり、差別を受けたりしてはならない」と記されています。

苦情を処理するために必要な以下の情報を提供してください。ご要望があれば、サポートいたします。このフォームに必要な事項をご記入の上、下記まで郵送またはご送付ください：

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202. 当事務所へのご連絡は、月曜日から金曜日の 8 時から 5 時まで、**303-299-6000** をお願いします。また、当事務所への電子メールは、**titlevicomplaints@rtd-denver.com** をお願いします。

1. 申立人の名前： _____
2. 住所： _____
3. 都市名： _____ 州名： _____ 郵便番号： _____
4. 電話番号（自宅）： _____ （ビジネス）： _____
5. 差別された方（申立人以外の場合）
氏名： _____
住所： _____
都市名： _____ 州名： _____ 郵便番号： _____
6. 差別は何に基づいて行われましたか？（該当するものすべてにチェック）
____ 人種 ____ 肌の色 ____ 国籍
7. 差別の原因となった事件の発生日： _____
8. どのように差別されたかを説明してください。どのような経緯で、誰に責任があるのでしょうか？追加のスペースが必要な場合は、用紙の裏面を使用して追加の用紙を添付してください。
9. どのようなRTD担当者が関与しましたか？
10. 事件はどこで発生しましたか？場所、バス番号、運転手の名前などを記入してください。

11. 目撃者？連絡先をご記入ください

氏名： _____
住所： _____
都市名： _____ 州名： _____ 郵便番号： _____
電話番号：（自宅） _____ （ビジネス）： _____
Eメール： _____

氏名： _____
住所： _____
都市名： _____ 州名： _____ 郵便番号： _____
電話番号：（自宅） _____ （ビジネス）： _____
Eメール： _____

氏名： _____
住所： _____
都市名： _____ 州名： _____ 郵便番号： _____
電話番号：（自宅） _____ （ビジネス）： _____
Eメール： _____

12. この苦情申立書を他の連邦、州、または地元の機関、あるいは連邦または州の裁判所に提出しましたか？

（該当する欄にチェック） _____ はい _____ いいえ

ご回答が「はい」の場合、苦情を申し立てた各機関にチェックを入れてください：

- | | | |
|---------------------------------|---------------------------------|-------------------------------|
| <input type="checkbox"/> 連邦政府機関 | <input type="checkbox"/> 連邦裁判所 | <input type="checkbox"/> 国立機関 |
| <input type="checkbox"/> 州裁判所 | <input type="checkbox"/> 地方公共団体 | <input type="checkbox"/> その他 |

13. ご苦情を申し立てた機関の担当者情報も記入してください。

氏名： _____
住所： _____
都市名： _____ 州名： _____ 郵便番号： _____
提出された日付： _____

下の欄に署名してください。ご苦情を裏付けと思われる資料があれば添付してください。

苦情申立人の署名

署名の日付

បុគ្គលណាម្នាក់ដែលជឿថាគាត់ត្រូវបានដកចេញពីការចូលរួម ឬបដិសេធពីអត្ថប្រយោជន៍នៃកម្មវិធី សកម្មភាព ឬសេវាកម្មរបស់ RTD ដោយសារតែការរើសអើងលើមូលដ្ឋាននៃជាតិសាសន៍ ពណ៌សម្បុរ ឬជាតិកំណើត អាចដាក់ពាក្យបណ្តឹង Title VI ជាមួយ RTD បាន។

ពាក្យបណ្តឹងត្រូវតែដាក់ក្នុងរយៈពេល 180 ថ្ងៃចាប់ពីកាលបរិច្ឆេទនៃការរើសអើងដែលត្រូវបានចោទប្រកាន់។ RTD អនុញ្ញាតឱ្យប្រើកំណត់ដើម្បីដាក់ពាក្យបណ្តឹងជំនួសឱ្យដើមប្តឹង។ រាល់ការប្រាស្រ័យទាក់ទងគ្នាគ្រោយពីការដាក់បណ្តឹងរួច នឹងត្រូវបញ្ជូនទៅអ្នកកំណត់ដើមបណ្តឹងជាដំបូង រួចហើយបញ្ជូនទៅដើមបណ្តឹងបន្តទៀត។

នៅពេលដាក់ពាក្យបណ្តឹងរួចនោះ RTD នឹងពិនិត្យមើលពាក្យបណ្តឹងឡើងវិញ ហើយសម្រេចថាតើយើងមានយុត្តាធិការដែរឬយ៉ាងណា។ អតិថិជននឹងទទួលបានលិខិតទទួលស្គាល់មួយដែលជូនដំណឹងដល់ពួកគេថាតើពាក្យបណ្តឹងនឹងត្រូវបានស៊ើបអង្កេតដោយ RTD ក្នុងរយៈពេលប្រាំពីរ (7) ថ្ងៃធ្វើការចាប់ពីពេលដែលពាក្យបណ្តឹងត្រូវបានដាក់ដែរឬទេ។ លុះត្រាតែរយៈពេលវែងជាងនេះត្រូវបញ្ជាក់ដោយ RTD នោះ ដើមបណ្តឹងនឹងមានពេលដប់ (10) ថ្ងៃគិតចាប់ពីកាលបរិច្ឆេទចុះនៅលើលិខិតនេះ ដើម្បីផ្ញើព័ត៌មានដែលបានស្នើសុំទៅអ្នកស៊ើបអង្កេតរបស់ RTD ដែលបានចាត់តាំងក្នុងសំណុំរឿងនេះ។

អ្នកស៊ើបអង្កេតអាចនឹងសម្ភាសបុគ្គលណាដែលមានឈ្មោះជាសាក្សី នឹងបុគ្គលផ្សេងទៀតដែលអាចមានព័ត៌មានទាក់ទងនឹងសំណុំរឿង។ ប្រសិនបើត្រូវការព័ត៌មានបន្ថែមដើម្បីដោះស្រាយករណីនេះ RTD អាចទាក់ទងដើមបណ្តឹង ឬសាក្សីរូបនោះ។ ប្រសិនបើអ្នកស៊ើបអង្កេតរបស់ RTD មិនត្រូវបានទាក់ទងដោយដើមបណ្តឹង ឬមិនទទួលបានព័ត៌មានបន្ថែមនៅក្នុងរយៈពេលដែលត្រូវការទេ នោះ RTD អាចនឹងបិទករណីនេះតាមនីតិវិធីរដ្ឋបាល។ ករណីមួយអាចនឹងត្រូវបានបិទតាមនីតិវិធីរដ្ឋបាលផងដែរ ប្រសិនបើដើមបណ្តឹងលែងចង់បន្តសំណុំរឿងរបស់ពួកគេទៅទៀត។

ជាទូទៅ RTD នឹងបញ្ចប់ការស៊ើបអង្កេតក្នុងរយៈពេលហុកសិប (60) ថ្ងៃ គិតចាប់ពីថ្ងៃទទួលបានពាក្យបណ្តឹងសព្វគ្រប់។ ទោះបីជា RTD ខិតខំដោះស្រាយពាក្យបណ្តឹងភ្លាមៗក៏ដោយ ក៏ដំណើរការនេះនឹងខុសគ្នាអាស្រ័យលើភាពស្មុគស្មាញនៃពាក្យបណ្តឹង បុគ្គលដែលពាក់ព័ន្ធ និងកត្តាផ្សេងៗទៀត។ នៅពេលដែលការស៊ើបអង្កេតបានបញ្ចប់ ដើមបណ្តឹងនឹងទទួលបានលិខិតឆ្លើយតបចុងក្រោយចំពោះពាក្យបណ្តឹងនោះ។

ប្រសិនបើដើមបណ្តឹងមិនយល់ស្របនឹងការសម្រេចរបស់ RTD ទេ ពួកគេអាចស្នើសុំការពិចារណាឡើងវិញដោយដាក់សំណើជាលាយលក្ខណ៍អក្សរទៅកាន់អ្នកគ្រប់គ្រងគោលច្បាប់ ឆ្លងកាត់ (Transit Equity) របស់ RTD ក្នុងរយៈពេលប្រាំពីរ (7) ថ្ងៃបន្ទាប់ពីកាលបរិច្ឆេទនៃលិខិតរបស់ RTD ដោយបញ្ជាក់ពីភាពជាក់លាក់នៃមូលដ្ឋានសម្រាប់ការពិចារណាឡើងវិញ។ អ្នកគ្រប់គ្រងនោះនឹងជូនដំណឹងទៅដើមបណ្តឹង អំពីការសម្រេចចិត្តរបស់ពួកគេក្នុងការទទួលយក ឬបដិសេធសំណើសុំឱ្យមានការពិចារណាឡើងវិញនេះក្នុងរយៈពេលដប់ (10) ថ្ងៃ។ ក្នុងករណីទទួលបានការអនុញ្ញាតឱ្យធ្វើការពិចារណាឡើងវិញ អ្នកគ្រប់គ្រងនឹងចេញលិខិតសម្រេចមួយទៅដើមបណ្តឹងនៅពេលបញ្ចប់ការត្រួតពិនិត្យដើម្បីធ្វើការពិចារណាឡើងវិញ។

Title VI នៃច្បាប់សិទ្ធិស៊ីវិលឆ្នាំ 1964 បញ្ជាក់ថា "គ្មានបុគ្គលណាម្នាក់នៅក្នុងសហរដ្ឋអាមេរិក ដោយផ្អែកលើពូជសាសន៍ ពណ៌សម្បុរ ឬសញ្ជាតិដើម មិនត្រូវបានរាប់បញ្ចូល ការចូលរួម ត្រូវបានគេបដិសេធពីអត្ថប្រយោជន៍ ឬទទួលបានការរើសអើងក្រោមកម្មវិធី ឬសកម្មភាពណាមួយដែលទទួលបានជំនួយហិរញ្ញវត្ថុសហព័ន្ធ។"

សូមផ្តល់ព័ត៌មានដែលចាំបាច់ខាងក្រោម ដើម្បីដំណើរការបណ្តឹងរបស់អ្នក។ មានផ្តល់ជូនជំនួយនៅពេលស្នើសុំ។ បំពេញទម្រង់បែបបទនេះ និងផ្ញើសំបុត្រ ឬបញ្ជូនទៅ៖

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202។ អ្នកអាចទាក់ទងមកការិយាល័យរបស់យើងពីថ្ងៃចន្ទដល់ថ្ងៃសុក្រពីម៉ោង 8-5 តាមរយៈលេខទូរសព្ទ **303-299-6000** ឬអ្នកអាចផ្ញើអ៊ីមែលមកការិយាល័យរបស់យើងតាមរយៈ **titlevicomplaints@rtd-denver.com**។

1. ឈ្មោះរបស់ដើមបណ្តឹង៖ _____
2. អាសយដ្ឋាន៖ _____
3. ទីក្រុង៖ _____ រដ្ឋ៖ _____ លេខកូដតំបន់៖ _____
4. លេខទូរសព្ទ (ផ្ទះ)៖ _____ (អាជីវកម្ម)៖ _____
5. បុគ្គលដែលរើសអើងប្រឆាំង (ប្រសិនបើក្រៅពីដើមបណ្តឹង)
ឈ្មោះ៖ _____
អាសយដ្ឋាន៖ _____
ទីក្រុង៖ _____ រដ្ឋ៖ _____ លេខកូដតំបន់៖ _____
6. តើការរើសអើងផ្អែកលើអ្វី? (ជើកទាំងអស់ដែលពាក់ព័ន្ធ)
☐ ជាតិសាសន៍ ☐ ពណ៌ ☐ សញ្ជាតិដើម
7. កាលបរិច្ឆេទនៃព្រឹត្តិការណ៍ដែលបណ្តាលឱ្យមានការរើសអើង៖ _____
8. ពណ៌នាអំពីរបៀបដែលអ្នកត្រូវបានគេរើសអើង។ តើមានអ្វីកើតឡើង ហើយនរណាជាអ្នកទទួលខុសត្រូវ? សម្រាប់កន្លែងទំនេរបន្ថែម សូមភ្ជាប់ សន្លឹកក្រដាសបន្ថែមអំពីការប្រើប្រាស់នៅផ្នែកខាងក្រោយនៃទម្រង់បែបបទ។
9. តើតំណាង RTD មានជាប់ពាក់ព័ន្ធនឹងអ្វី?
10. តើព្រឹត្តិការណ៍បានកើតឡើងនៅទីណា? សូមផ្តល់ទីតាំង លេខរថយន្តក្រុង ឈ្មោះអ្នកបើកបរ។ល។

11. មានសាក្សីឬ? សូមផ្តល់ព័ត៌មានទំនាក់ទំនងរបស់គេ។

ឈ្មោះ: _____
អាសយដ្ឋាន: _____
ទីក្រុង: _____ រដ្ឋ: _____ លេខកូដតំបន់: _____
លេខទូរសព្ទ: (ផ្ទះ) _____ (អាជីវកម្ម): _____
អ៊ីមែល: _____

ឈ្មោះ: _____
អាសយដ្ឋាន: _____
ទីក្រុង: _____ រដ្ឋ: _____ លេខកូដតំបន់: _____
លេខទូរសព្ទ: (ផ្ទះ) _____ (អាជីវកម្ម): _____
អ៊ីមែល: _____

ឈ្មោះ: _____
អាសយដ្ឋាន: _____
ទីក្រុង: _____ រដ្ឋ: _____ លេខកូដតំបន់: _____
លេខទូរសព្ទ: (ផ្ទះ) _____ (អាជីវកម្ម): _____
អ៊ីមែល: _____

12. តើអ្នកបានដាក់ពាក្យបណ្តឹងនេះជាមួយភ្នាក់ងារសហព័ន្ធ រដ្ឋ ឬភ្នាក់ងារក្នុងមូលដ្ឋាន ឬជាមួយតុលាការរដ្ឋ ឬសហព័ន្ធដែរទេ? ☒ បាទ/ចាស ☐ ទេ

ប្រសិនបើចម្លើយបាទ/ចាស សូមជ្រើសរើសភ្នាក់ងារនីមួយៗដែលបានដាក់:

- | | | |
|---|---|--|
| <input type="checkbox"/> ភ្នាក់ងារសហព័ន្ធ | <input type="checkbox"/> តុលាការសហព័ន្ធ | <input type="checkbox"/> ភ្នាក់ងាររដ្ឋ |
| <input type="checkbox"/> តុលាការរដ្ឋ | <input type="checkbox"/> ភ្នាក់ងារក្នុងមូលដ្ឋាន | <input type="checkbox"/> ផ្សេងៗ |

13. ផ្តល់ព័ត៌មានអំពីបុគ្គលទំនាក់ទំនងសម្រាប់ភ្នាក់ងារដែលអ្នកបានដាក់ពាក្យបណ្តឹងផងដែរ:

ឈ្មោះ: _____
អាសយដ្ឋាន: _____
ទីក្រុង: _____ រដ្ឋ: _____ លេខកូដតំបន់: _____
កាលបរិច្ឆេទដែលបានដាក់ពាក្យ: _____

ចុះហត្ថលេខាលើបណ្តឹងនៅកន្លែងទំនេរខាងក្រោម។ ភ្ជាប់ឯកសារនានាដែលអ្នកជឿជាក់ថាគាំទ្រដល់បណ្តឹងរបស់អ្នក។

ហត្ថលេខារបស់ដើមបណ្តឹង

កាលបរិច្ឆេទចុះហត្ថលេខា

인종, 피부색, 출신 국가에 따른 차별 때문에 RTD의 프로그램, 활동, 서비스를 참여하지 못하거나 혜택 수령이 거부되었다고 생각한다면 누구나 시민권에 근거하여 RTD를 고소할 수 있습니다.

고소자는 차별 혐의가 제기된 날에서 180일 안에 접수해야 합니다. RTD는 대리인을 통해 고소를 제기할 수 있도록 허용해야 합니다. 고소 이후 모든 연락은 고소 대리인이 일차로 받고 그다음 고소인이 이차로 받습니다.

고소를 제기하면 RTD는 고소를 검토하고 관할권이 있는지 알아볼 것입니다. 고소인은 고소가 접수된 날에서 칠(7)영업일 안에 고소한 내용을 RTD가 조사했는지를 알리는 서한을 받게 됩니다. RTD에서 더 긴 기간을 명시하지 않았다면 고소인은 서한에 있는 날짜에서 십(10)일 안에 사건을 할당받은 RTD 조사관에게 요청받은 정보를 보내야 합니다.

조사관은 증인으로 지명받은 모든 사람과 정보를 가지고 있을 수 있다고 생각되는 다른 이들을 인터뷰할 수 있습니다. 사건을 해결하기 위해 더 많은 정보가 필요한 경우, RTD에서는 고소인이나 증인에게 연락할 수 있습니다. RTD 조사관이 고소인에게 연락을 받지 못했거나 필요한 시간 안에 추가 정보를 받지 못했다면 RTD는 행정에 따라 소송을 종결할 수 있습니다. 고소인이 더 이상 소송을 진행하길 원하지 않는 경우에도 행정에 따라 사건을 종결할 수 있습니다.

일반적으로 RTD는 작성 완료된 소송 서식을 받은 후 육십(60)일 안에 조사를 완료해야 합니다. RTD는 고소 내용을 해결하기 위해 노력할 것이지만, 해당 절차는 고소 내용의 복잡성, 관련 개인, 기타 요인에 따라 달라집니다. 조사를 완료하면 고소인은 고소 내용에 대한 최종 답변서를 받습니다.

고소인이 RTD 결정에 동의하지 않는다면, RTD 서신 날짜에서 칠(7)일 안에 서면으로 재심 근거를 명시하여 RTD의 Transit Equity Manager에게 재심을 요청할 수 있습니다. Transit Equity Manager는 십(10)일 안에 재심의 요청을 수락 또는 거부할지 결정하여 고소인에게 통지해야 합니다. 재심 요청이 받아들여졌다면 Transit Equity Manager는 재심 검토를 완료하는 즉시 고소인에게 우호적 확정서를 발행해야 합니다.

제6조 탄원서



1964년 민권법 제6조(Title VI of the Civil Rights Act of 1964)에는 "미국 내 어느 누구도 인종, 피부색 또는 출신 국가를 근거로 연방 재정 지원을 받는 프로그램이나 활동으로부터 배제되거나 프로그램이나 활동의 참여에서 제외되거나 프로그램이나 활동의 혜택을 거부당하거나 프로그램이나 활동에 관해 차별을 당해서는 안 된다"라고 명시되어 있습니다.

귀하의 탄원을 처리하는 데 필요한 다음 정보를 알려 주십시오. 요청하시면 지원을 받으실 수 있습니다. 이 탄원서를 작성해서 다음 주소로 우편 발송하거나 전달하십시오.

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31,
Denver, CO 80202. 저희 사무실 전화번호는 303-299-6000번이고 월요일부터 금요일까지
오전 8시부터 오후 5시까지 영업하며 이메일(titlevicomplaints@rtd-denver.com)을
이용하실 수도 있습니다.

1. 탄원인의 이름: _____
2. 주소: _____
3. 시: _____ 주: _____ 우편번호: _____
4. 전화번호(집): _____ (직장): _____
5. 차별 피해자(탄원인 외)

이름: _____
주소: _____
시: _____ 주: _____ 우편번호: _____
6. 무엇에 근거한 차별을 당하셨습니까? (해당되는 항목에 모두 표시하십시오)
☐ 인종 ☐ 피부색 ☐ 출신국
7. 차별 사건이 발생한 날짜: _____
8. 어떤 차별을 당했는지 설명해 주십시오. 어떤 일이 일어났고 누구에게 책임이 있습니까? 적을 공간이 부족하다면 추가 용지를 첨부하거나 탄원서 뒷면을 이용하십시오.
9. 어떤 RTD 담당자가 관련되어 있습니까?
10. 차별 사건이 어디에서 발생했습니까? 위치, 버스 번호, 운전자 이름 등을 알려 주십시오.

(뒷면에서 계속.)

11. 목격자가 있습니까? 목격자의 연락처 정보를 알려 주십시오.

이름: _____

주소: _____

시: _____ 주: _____ 우편번호: _____

전화번호: (집) _____ (직장): _____

이메일: _____

이름: _____

주소: _____

시: _____ 주: _____ 우편번호: _____

전화번호: (집) _____ (직장): _____

이메일: _____

이름: _____

주소: _____

시: _____ 주: _____ 우편번호: _____

전화번호: (집) _____ (직장): _____

이메일: _____

12. 다른 연방, 주, 또는 지방 기관이나 연방 또는 주 법원에 이 탄원서를 제출하셨습니다습니까?(해당 공란에 표시하십시오) ☐ 예 ☐ 아 니 요

예라고 답했다면, 탄원서가 제출된 각 기관에 체크 표시를 하십시오.

☐ 연방 기관 ☐ 연방 법원 ☐ 주 법원☐ 주 법원 ☐ 지방 법원 ☐ 기타**13. 탄원서가 제출된 기관의 연락 담당자 정보를 알려 주십시오.**

이름: _____

주소: _____

시: _____ 주: _____ 우편번호: _____

제출 날짜: _____

탄원서의 아래 공란에 서명하십시오. 귀하의 탄원 주장을 뒷받침할 증빙 서류를 첨부하십시오.

탄원인 서명

서명 날짜

ບຸກຄົນໃດທີ່ເຊື່ອວ່າຕົນຖືກກົດກັນຈາກການເຂົ້າຮ່ວມ ຫຼື ຖືກປະຕິເສດບໍ່ໃຫ້ຮັບສິດຜົນປະໂຫຍດຈາກແຜນງານ, ກິດຈະກຳ ຫຼື ການບໍລິການຂອງ RTD ເນື່ອງຈາກການເລືອກປະຕິບັດບົນພື້ນຖານຊົນຊາດ, ສີຜິວ ຫຼື ຊາດຕົນກໍາເນີດ ແມ່ນສາມາດຍື່ນຄໍາຮ້ອງຮຽນຕໍ່ຫົວຂໍ້ທີ VI ໃຫ້ແກ່ RTD ໄດ້.

ຕ້ອງມີການປະກອບຄໍາຮ້ອງຮຽນພາຍໃນ 180 ມື້ ນັບແຕ່ມື້ທີ່ມີການກ່າວຫາວ່າໄດ້ມີການເລືອກປະຕິບັດ. RTD ອະນຸຍາດໃຫ້ນຳ ໃຊ້ຜູ້ຕາງໜ້າ ໃນການຍື່ນຄໍາຮ້ອງຮຽນ ໃນນາມຂອງຜູ້ຮ້ອງຮຽນ. ການສື່ສານທັງໝົດຫຼັງຈາກທີ່ມີການຮ້ອງຮຽນ ແມ່ນຈະໄດ້ມີ ການສົ່ງເຖິງຜູ້ຕາງໜ້າຂອງຜູ້ຮ້ອງຮຽນໃນລຳດັບຕົ້ນ ແລະ ເຖິງຜູ້ຮ້ອງຮຽນໃນລຳດັບຮອງ.

ເມື່ອມີການຍື່ນຄໍາຮ້ອງຮຽນ, RTD ຈະກວດສອບຄໍາຮ້ອງຮຽນ ແລະ ຕັດສິນວ່າພວກເຮົາມີອຳນາດໃນການຕັດສິນ ຫຼື ບໍ່. ລູກຄ້າ ຈະໄດ້ຮັບໜັງສືຮັບຮູ້ ເພື່ອແຈ້ງເຂົາວ່າຄໍາຮ້ອງຮຽນຈະໄດ້ຮັບການກວດສອບໂດຍ RTD ຫຼື ບໍ່ ພາຍໃນເຈັດ (7) ມື້ ລັດຖະການ ນັບແຕ່ມື້ທີ່ມີການຍື່ນຄໍາຮ້ອງຮຽນ. ນອກຈາກນີ້ຈະມີການລະບຸໄລຍະເວລາທີ່ດົນຂຶ້ນໂດຍ RTD, ຜູ້ຮ້ອງຮຽນແມ່ນມີເວລາສິບ (10) ມື້ ນັບແຕ່ມື້ວົງວັນທີຂອງຈົດໝາຍດັ່ງກ່າວ ໃນການສົ່ງຂໍ້ມູນທີ່ມີການສະເໜີຂໍ ໃຫ້ແກ່ຜູ້ກວດສອບຂອງ RTD ທີ່ໄດ້ຮັບ ມອບໝາຍກັບກໍລະນີຄວາມດັ່ງກ່າວ.

ຜູ້ກວດສອບອາດຈະສຳພາດບຸກຄົນໃດໜຶ່ງ ທີ່ມີຊື່ເປັນພະຍານ ແລະ ບຸກຄົນໃດໜຶ່ງທີ່ອາດຈະມີຂໍ້ມູນ. ຖ້າຈຳເປັນຕ້ອງມີຂໍ້ມູນ ເພີ່ມ ເຕີມເພື່ອແກ້ໄຂກໍລະນີຄວາມດັ່ງກ່າວ, RTD ອາດຈະຕິດຕໍ່ຜູ້ຮ້ອງຮຽນ ຫຼື ພະຍານ. ຖ້າຜູ້ກວດສອບຂອງ RTD ບໍ່ໄດ້ຮັບການ ຕິດຕໍ່ຈາກຜູ້ຮ້ອງຮຽນ ຫຼື ບໍ່ໄດ້ຮັບຂໍ້ມູນເພີ່ມເຕີມພາຍໃນໄລຍະເວລາທີ່ໄດ້ກຳນົດໄວ້, RTD ອາດຈະປິດກໍລະນີຄວາມດັ່ງກ່າວ ໃນທາງບໍລິຫານ. ກໍລະນີຄວາມແມ່ນສາມາດປິດໃນທາງບໍລິຫານໄດ້ ຖ້າຫາກວ່າຜູ້ຮ້ອງຮຽນບໍ່ຕ້ອງການສືບຕໍ່ກໍລະນີຄວາມຂອງ ເຂົາອີກຕໍ່ໄປ.

ໂດຍທົ່ວໄປແລ້ວ RTD ຈະກວດສອບໃຫ້ສຳເລັດພາຍໃນຫົກສິບ (60) ມື້ ນັບແຕ່ມື້ທີ່ໄດ້ຮັບແບບຟອມຮ້ອງຮຽນ. ເຖິງວ່າ RTD ຈະພະຍາຍາມແກ້ໄຂຄໍາຮ້ອງຮຽນໃຫ້ໄວ, ແຕ່ຂັ້ນຕອນດັ່ງກ່າວນີ້ຈະມີຄວາມແຕກຕ່າງອອກໄປ ໂດຍຂຶ້ນກັບຄວາມຊັບຊ້ອນຂອງຄໍາ ຮ້ອງຮຽນ, ບຸກຄົນທີ່ກ່ຽວຂ້ອງ ແລະ ປັດໄຈອື່ນໆ. ເມື່ອມີການສະຫຼຸບການກວດສອບ, ຜູ້ຮ້ອງຮຽນຈະໄດ້ຮັບໜັງສືຕອບກັບສະບັບ ສຸດທ້າຍກ່ຽວກັບຄໍາຮ້ອງຮຽນ.

ຖ້າຜູ້ຮ້ອງຮຽນປະຕິເສດຄຳຕັດສິນຂອງ RTD, ເຂົາສາມາດສະເໜີຂໍໃຫ້ມີການພິຈາລະນາຄືນໃໝ່ ໂດຍການຍື່ນຄໍາຮ້ອງ ຂໍຢ່າງເປັນ ລາຍລັກອັກສອນເຖິງ Transit Equity Manager ຂອງ RTD ພາຍໃນເຈັດ (7) ມື້ ຫຼັງຈາກມື້ວົງວັນຂອງໜັງສືຈາກ RTD ໂດຍລະບຸສະເພາະພື້ນຖານສຳລັບການພິຈາລະນາຄືນ. Transit Equity Manager ຈະແຈ້ງຜູ້ຮ້ອງຮຽນກ່ຽວກັບຄຳຕັດສິນວ່າຈະ ຍອມຮັບ ຫຼື ປະຕິເສດການພິຈາລະນາຄືນພາຍໃນສິບ (10) ມື້. ໃນກໍລະນີທີ່ມີການອະນຸຍາດໃຫ້ມີການພິຈາລະນາ ຄືນ, Transit Equity Manager ຈະອອກໜັງສືຄຳຕັດສິນໃຫ້ແກ່ຜູ້ຮ້ອງຮຽນ ເມື່ອມີການກວດສອບການພິຈາລະນາຄືນສຳເລັດ.

ແບບຟອມການຮ້ອງທຸກຕາມພາກທີ VI



ພາກທີ VI ຂອງກົດໝາຍວ່າດ້ວຍສິດທິພົນລະເມືອງ (Civil Rights Act) ສະບັບປີ 1964 ລະບຸວ່າ “ບໍ່ມີບຸກຄົນໃດໜຶ່ງໃນສະຫະລັດ ຈະຖືກກົດກັນຈາກ, ການເຂົ້າຮ່ວມໃນ, ຖືກປະຕິເສດຜົນປະໂຫຍດຂອງ ຫຼື ຖືກຈຳແນກພາຍໃຕ້ໂຄງການ ຫຼື ກົດຈະກຳໃດໆ ທີ່ໄດ້ຮັບການຊ່ວຍເຫຼືອທາງດ້ານການເງິນຈາກລັດຖະບານກາງ ບົນພື້ນຖານເຊື້ອຊາດ, ສີເຜິວ ຫຼື ຊາດກຳເນີດ.”

ກະລຸນາໃຫ້ຂໍ້ມູນທີ່ຈຳເປັນຕໍ່ໄປນີ້ ເພື່ອການດຳເນີນການຄົ້ນຄວ້າການຮ້ອງຮຽນຂອງທ່ານ, ຈະມີການຊ່ວຍເຫຼືອໃຫ້ຕາມການຮ້ອງຂໍ. ຕື່ມແບບຟອມນີ້ ແລະ ສົ່ງທາງໄປສະນີ ຫຼື ສົ່ງໄປທີ:

Regional Transportation District (ຂອດການຂົນສົ່ງປະຈຳພາກພື້ນ), Transit Equity Office
(ຫ້ອງການກອງທຶນການຂົນສົ່ງ), 1660 Blake Street BLK-31, Denver, CO 80202
ທ່ານສາມາດຕິດຕໍ່ຫ້ອງການຂອງພວກເຮົາໄດ້ ແຕ່ວັນຈັນ ເຖິງ ວັນສຸກ ຈາກ 8-5 ໂມງ ທີ່ເປີດ 303-299-6000 ຫຼື
ທ່ານສາມາດສົ່ງອີເມວຫາຫ້ອງການຂອງພວກເຮົາໄດ້ທີ່ titlevicomplaints@rtd-denver.com.

1. ຊື່ຜູ້ຮ້ອງທຸກ: _____
2. ທີ່ຢູ່: _____
3. ເມືອງ: _____ ລັດ: _____ ລະຫັດໄປສະນີ: _____
4. ເບີໂທລະສັບ (ບ້ານ): _____ (ທຸລະກິດ): _____
5. ບຸກຄົນທີ່ຖືກຈຳແນກ (ຖ້າບໍ່ແມ່ນຜູ້ຮ້ອງຮຽນໂດຍກົງ)
ຊື່: _____
ທີ່ຢູ່: _____
ເມືອງ: _____ ລັດ: _____ ລະຫັດໄປສະນີ: _____
6. ການຈຳແນກແມ່ນອີງໃສ່ບົນພື້ນຖານຫຍັງ? (ໝາຍທຸກຂໍ້ທີ່ກ່ຽວຂ້ອງ)
____ ເຊື້ອຊາດ ____ ສີເຜິວ ____ ຊາດກຳເນີດ
7. ວັນທີເກີດເຫດການທີ່ສົ່ງຜົນໃຫ້ມີການຈຳແນກ: _____
8. ອະທິບາຍວ່າທ່ານຖືກຈຳແນກຄືແນວໃດ. ເກີດຫຍັງຂຶ້ນ ແລະ ແມ່ນໃຜເປັນຄົນຮັບຜິດຊອບ?
ຖ້າຫາກຕ້ອງການພື້ນທີ່ເພີ່ມເຕີມ, ໃຫ້ແນບເຈ້ຍເພີ່ມເຕີມໃສ່ດ້ານຫຼັງຂອງແບບຟອມນີ້.
9. ຜູ້ຕາງໜ້າຂອງ RTD ໃດແດ ມີສ່ວນກ່ຽວຂ້ອງ?
10. ເຫດການດັ່ງກ່າວເກີດຂຶ້ນຢູ່ໃສ? ກະລຸນາລະບຸສະຖານທີ່, ໝາຍເລກທະບຽນລົດເມ, ຊື່ຄົນຂັບ ແລະ ອື່ນໆ.

11. ມີພະຍານບໍ່? ກະລຸນາໃຫ້ຂໍ້ມູນຕິດຕໍ່ຂອງເຂົາເຈົ້າ.

ຊື່: _____
 ທີ່ຢູ່: _____
 ເມືອງ: _____ ລັດ: _____ ລະຫັດໄປສະນີ: _____
 ເບີໂທລະສັບ: (ບ້ານ) _____ (ທຸລະກິດ): _____
 ອີເມວ: _____

ຊື່: _____
 ທີ່ຢູ່: _____
 ເມືອງ: _____ ລັດ: _____
 ເບີໂທລະສັບ: (ບ້ານ) _____ (ທຸລະກິດ): _____
 ອີເມວ: _____

ຊື່: _____
 ທີ່ຢູ່: _____
 ເມືອງ: _____ ລັດ: _____
 ເບີໂທລະສັບ: (ບ້ານ) _____ (ທຸລະກິດ): _____
 ອີເມວ: _____

12. ທ່ານໄດ້ຍື່ນຄໍາຮ້ອງທຸກສະບັບນີ້ຕໍ່ໜ່ວຍງານຂອງລັດຖະບານກາງ, ລັດ ຫຼື ໜ່ວຍງານໃນທ້ອງຖິ່ນອື່ນໆ ຫຼື ຍື່ນຕໍ່ກັບສານຂອງລັດຖະບານກາງ ຫຼື ລັດ ບໍ່?
 (ໝາຍໃສ່ບ່ອນທີ່ເໝາະສົມ) _____ ແມ່ນ _____ ບໍ່

ຖ້າຄໍາຕອບຄື ແມ່ນ, ໃຫ້ໝາຍໃສ່ແຕ່ລະໜ່ວຍງານທີ່ໄດ້ຍື່ນຄໍາຮ້ອງທຸກຕໍ່:

- | | | |
|--|--|--|
| <input type="checkbox"/> ໜ່ວຍງານຂອງລັດຖະບານກາງ | <input type="checkbox"/> ສານຂອງລັດຖະບານກາງ | <input type="checkbox"/> ໜ່ວຍງານຂອງລັດ |
| <input type="checkbox"/> ສານຂອງລັດ | <input type="checkbox"/> ໜ່ວຍງານປະຈຳທ້ອງຖິ່ນ | <input type="checkbox"/> ອື່ນໆ |

13. ໃຫ້ຂໍ້ມູນຜູ້ຕິດຕໍ່ຂອງໜ່ວຍງານທີ່ທ່ານໄດ້ຍື່ນຄໍາຮ້ອງທຸກຕໍ່:

ຊື່: _____
 ທີ່ຢູ່: _____
 ເມືອງ: _____ ລັດ: _____ ລະຫັດໄປສະນີ: _____
 ວັນທີຍື່ນ: _____

ເຊັ່ນແບບຟອມການຮ້ອງທຸກຢູ່ໃນຊ່ອງຫວ່າງຂ້າງລຸ່ມນີ້. ແນບເອກະສານຕ່າງໆ ທີ່ທ່ານເຊື່ອວ່າ
 ຈະສາມາດສະໜັບສະໜູນການຮ້ອງທຸກຂອງທ່ານໄດ້.

आफूलाई जाति, रङ वा मूल राष्ट्रको आधारमा भेदभाव भएको कारणले RTD का कार्यक्रम, क्रियाकलाप वा सेवाहरूमा सहभागी हुनबाट वञ्चित गरिएको छ वा अस्वीकार गरिएको छ भनी विश्वास लाग्ने कोही पनि व्यक्तिले RTD लाई शीर्षक VI उजुरी दायर गर्न सक्नुहुन्छ।

उजुरी शंकास्पद भेदभाव भएको मितिबाट 180 दिनभित्र दायर गर्नुपर्छ। RTD ले उजुरीकर्ताको तर्फबाट उजुरी दायर गर्नका लागि प्रतिनिधिको प्रयोग गर्न अनुमति दिन्छ। उजुरीसम्बन्धी सबै कुराकानी प्राथमिक रूपमा उजुरीकर्ताको प्रतिनिधि र सहायक रूपमा उजुरीकर्तालाई निर्दिष्ट गरिने छ।

उजुरी दायर गरेपछि, RTD ले उजुरीको समीक्षा गर्नु हुने छ र हामीसँग विशेषअधिकार छ वा छैन भनी निर्धारण गर्ने छ। ग्राहकले उजुरी दायर गरेको सात (7) व्यावसायिक दिनभित्र RTD द्वारा उजुरीको अनुसन्धान गरिने छ वा छैन भनी आफूलाई सूचित गर्ने स्वीकृति पत्र प्राप्त गर्नु हुने छ। RTD द्वारा लामो अवधि उल्लिखित नगर्दासम्म, उजुरीकर्तासँग मुद्दामा निर्दिष्ट गरिएको RTD अनुसन्धानकर्तालाई अनुरोध गरिएको जानकारी पठाउनका लागि पत्र लेखेको मितिबाट दश (10) दिन रहने छ।

अनुसन्धानकर्ताले साक्षीहरूको रूपमा नामाङ्कित व्यक्तिहरू र जानकारी हुन सक्ने अन्य कुनै पनि व्यक्तिको अन्तर्वार्ता लिन सक्नुहुन्छ। मुद्दा समाधान गर्नका लागि थप जानकारी आवश्यक भएको खण्डमा RTD ले उजुरीकर्ता वा साक्षीलाई सम्पर्क गर्न सक्छ। RTD को अनुसन्धानकर्तालाई उजुरीकर्ताद्वारा सम्पर्क गरिंदैन वा आवश्यक समयरेखाभित्र अतिरिक्त जानकारी प्राप्त गर्नु हुँदैन भने, RTD ले प्रशासनिक रूपमा मुद्दा बन्द गर्न सक्छ। उजुरीकर्ताले अब उपरान्त आफ्नो मुद्दा अनुसरण गर्ने इच्छा नगरेमा पनि मुद्दालाई प्रशासनिक रूपमा बन्द गर्न सकिन्छ।

RTD ले पूरा गरिएको उजुरी फाराम प्राप्त गरेको साठी (60) दिनभित्र सामान्यतया अनुसन्धान पूरा गर्ने छ। RTD ले उजुरीहरू शीघ्र रूपमा समाधान गर्ने प्रयास गरेतापनि, यो प्रक्रिया उजुरीको जटिलता, संलग्न व्यक्ति र अन्य कारकहरूमा निर्भर रहेर फरक-फरक हुने छ। अनुसन्धानको निष्कर्ष निस्किएपछि, उजुरीकर्ताले उजुरीसम्बन्धी अन्तिम प्रतिक्रिया पत्र प्राप्त गर्नु हुने छ।

उजुरीकर्ता RTD को निर्णयसँग असहमत हुनुहुन्छ भने, उहाँहरूले RTD को पत्र प्राप्त गरेको 7 दिनभित्र RTD को ट्रान्जिट इक्विटी व्यवस्थापकलाई विशिष्ट रूपमा पुनर्विचारको आधार उल्लेख गर्दै लिखितमा अनुरोध पेश गरेर पुनर्विचारको अनुरोध गर्न सक्नुहुन्छ। ट्रान्जिट इक्विटी व्यवस्थापकले पुनर्विचारको अनुरोध स्वीकार गर्ने वा अस्वीकार गर्ने आफ्नो निर्णयको बारेमा दश (10) दिनभित्र उजुरीकर्तालाई सूचित गर्नु हुने छ। पुनर्विचार गर्ने अनुमति दिइएको अवस्थामा, ट्रान्जिट इक्विटी व्यवस्थापकले पुनर्विचार समीक्षाको समापनपश्चात उजुरीकर्तालाई निर्णय पत्र जारी गर्नु हुने छ।

1964 राज्यको नागरिक अधिकार ऐनको शीर्षक VI “संयुक्त राज्य अमेरिकामा कुनै पनि व्यक्तिलाई, जाति, रङ्ग वा राष्ट्रिय मूल बासिन्दाको आधारमा, संघीय आर्थिक सहायता प्राप्त गर्ने कुनै पनि कार्यक्रम वा गतिविधि अन्तर्गतबाट बहिष्कृत, सहभागिता, फाइदाहरूबाट वञ्चित वा भेदभावको अधीनमा गरिने छैन।”

कृपया तपाईंको उजुरी प्रक्रियाको लागि आवश्यक निम्न जानकारी प्रदान गर्नुहोस्। अनुरोध गरेमा सहायता उपलब्ध हुन्छ। यो फारम भर्नुहोस् र मेल गरेर वा सिधै पठाउनलाई:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202।
तपाईं हाम्रो कार्यालयमा सोमबार-शुक्रबार 8-5 सम्म 303-299-6000 मा पुग्न सक्नुहुन्छ, वा तपाईं हाम्रो कार्यालय
titlevicomplaints@rtd-denver.com मा इमेल गर्न सक्नुहुन्छ।

- उजुरीकर्ताको नाम: _____
- ठेगाना: _____
- शहर: _____ राज्य: _____ जिप कोड: _____
- टेलिफोन नम्बर (घर): _____ (व्यवसाय): _____
- भेदभाव भएको व्यक्ति (यदि उजुरीकर्ता बाहेक)
नाम: _____
ठेगाना: _____
शहर: _____ राज्य: _____ जिप कोड: _____
- के को आधारमा भेदभाव भयो? (लागू हुने सबै जाँच गर्नुहोस्)
____ जाति ____ रङ ____ राष्ट्रिय उत्पत्ति
- भेदभाव भएको घटनाको मिति: _____
- तपाईंलाई कसरी भेदभाव गरियो वर्णन गर्नुहोस्। के भयो र जिम्मेवार को थियो? थप ठाउँको लागि, फारमको पछाडि प्रयोगको कागजको अतिरिक्त पानाहरू संलग्न गर्नुहोस्।
- कस्ता RTD प्रतिनिधिहरू संलग्न थिए?
- कहाँ घट्यो घटना? कृपया स्थान, बस नम्बर, चालकको नाम, आदि प्रदान गर्नुहोस्।

11. साक्षी? कृपया तिनीहरूको सम्पर्क जानकारी प्रदान गर्नुहोस्।

नाम: _____
 ठेगाना: _____
 शहर: _____ राज्य: _____ जिप कोड: _____
 टेलिफोन नम्बरहरू: (घर) _____ (व्यवसाय): _____
 ईमेल: _____

नाम: _____
 ठेगाना: _____
 शहर: _____ राज्य: _____ जिप कोड: _____
 टेलिफोन नम्बरहरू: (घर) _____ (व्यवसाय): _____
 ईमेल: _____

नाम: _____
 ठेगाना: _____
 शहर: _____ राज्य: _____ जिप कोड: _____
 टेलिफोन नम्बरहरू: (घर) _____ (व्यवसाय): _____
 ईमेल: _____

12. के तपाईंले यो उजुरी अर्को संघीय, राज्य वा स्थानीय निकायमा फाइल गर्नुभयो; वा संघीय वा राज्य अदालत संग गर्नुभयो?

(उपयुक्त ठाउँ जाँच गर्नुहोस्) _____ हो _____ होइन

यदि जवाफ हो भने, प्रत्येक एजेन्सी गुनासो दायर गरिएको जाँच गर्नुहोस्:

- | | | |
|--|--|--|
| <input type="checkbox"/> संघीय एजेन्सी | <input type="checkbox"/> संघीय अदालत | <input type="checkbox"/> राज्य एजेन्सी |
| <input type="checkbox"/> राज्य अदालत | <input type="checkbox"/> स्थानीय एजेन्सी | <input type="checkbox"/> अन्य |

13. तपाईंले उजुरी दायर गरेको एजेन्सीको लागि सम्पर्क व्यक्ति जानकारी प्रदान गर्नुहोस्:

नाम: _____
 ठेगाना: _____
 शहर: _____ राज्य: _____ जिप कोड: _____
 फाइल गरिएको मिति: _____

तल स्पेसमा गुनासो हस्ताक्षर गर्नुहोस्। कुनै पनि कागजातहरू संलग्न गर्नुहोस् जुन तपाईंले आफ्नो उजुरीलाई समर्थन गर्दछ।

उजुरीकर्ताको हस्ताक्षर

हस्ताक्षर मिति

هر فردی که معتقد است به خاطر تبعیض ناشی از نژاد، رنگ پوست یا ملیت از شرکت در برنامه‌ها، فعالیت‌ها، یا خدمات RTD یا بهرمندی از مزایای آن‌ها محروم شده‌است می‌تواند شکایت عنوان ششم را در RTD مطرح کند.

شکایت باید ظرف 180 روز از تاریخ تبعیض مورد ادعا مطرح شود. RTD استفاده از نماینده برای طرح شکایت از طرف شاکی را مجاز می‌داند. تمام تماس‌های مربوط به شکایت در ابتدا با نماینده شاکی و سپس با خود شاکی گرفته می‌شود.

وقتی شکایت مطرح شد، RTD شکایت را بررسی می‌کند و مشخص می‌کند که آیا ما صلاحیت قضایی داریم یا خیر. ظرف هفت (7) روز کاری از طرح شکایت مشتری نامه تأییدیه‌ای را دریافت می‌کند که به او اطلاع می‌دهد آیا شکایت مورد بررسی RTD قرار خواهد گرفت یا خیر. چنانچه زمان بیشتری از سوی RTD تعیین نشده باشد، شاکی ده (10) روز از تاریخ نامه فرصت دارد تا اطلاعات درخواست شده را به مأمور تحقیق RTD تعیین شده برای این پرونده بفرستد.

مأمور تحقیق ممکن است با هر فردی که به عنوان شاهد ذکر شده یا هر فرد مطلع دیگری مصاحبه کند. چنانچه اطلاعات بیشتری برای حل پرونده نیاز باشد، RTD ممکن است با شاکی یا شاهد تماس بگیرد. در صورتیکه مأمور تحقیق RTD تماسی از شاکی دریافت نکند یا ظرف مدت لازم اطلاعات دیگری دریافت نکند، RTD ممکن است به لحاظ اداری پرونده را ببندد. همچنین پرونده ممکن است در صورت عدم تمایل شاکی برای پیگیری آن به طور اداری بسته شود.

RTD معمولاً تحقیقات را ظرف شصت (60) روز از دریافت فرم شکایت پر شده تکمیل می‌کند. گرچه RTD سعی می‌کند شکایت‌ها را سریع حل و فصل کند، این فرآیند بسته به پیچیدگی شکایت، افراد درگیر، و سایر عوامل متفاوت خواهد بود. وقتی تحقیقات به نتیجه برسد، شاکی نامه پاسخی به شکایت را دریافت خواهد کرد.

در صورتیکه شاکی با تصمیم RTD مخالف باشد، می‌تواند ظرف هفت (7) روز از تاریخ نامه RTD با ارائه درخواست کتبی به مدیر RTD's Transit Equity درخواست تجدیدنظر کند، و مبنای تجدیدنظر را به تفصیل بیان کند. مدیر Transit Equity تصمیم خود مبنی بر قبول یا رد درخواست تجدیدنظر را ظرف ده (10) روز به شاکی اطلاع خواهد داد. در مواردی که تجدیدنظر صورت گیرد، مدیر Transit Equity بعد از تکمیل بررسی تجدیدنظر نامه تصمیم خود را به شاکی خواهد فرستاد.

بند ۶ قانون حقوق مدنی سال ۱۹۶۴ بیان می‌کند که "هیچ فردی در ایالات متحده نباید به دلیل نژاد، رنگ پوست یا خاستگاه ملی از مشارکت در هیچ یک از برنامه‌ها یا فعالیت‌های دریافت کننده کمک‌های مالی فدرال مستثنی باشد، یا از مزایای آن محروم شود، یا مورد تبعیض قرار گیرد

لطفا اطلاعات لازم زیر را برای پردازش شکایت خود ارائه دهید. کمک در صورت درخواست در دسترس است. این فرم را تکمیل کرده و آن را پست کنید یا به آدرس زیر تحویل دهید

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202. شما می‌توانید روزهای دوشنبه تا جمعه از ساعت ۸ تا ۵ با استفاده از شماره 303-299-6000 با دفتر ما تماس بگیرید، یا اینکه 80202 ایمیل بزنید titlevicomplaints@rtd-denver.com به دفتر ما به آدرس

1. نام شاکی: _____
2. نشانی: _____
3. شهر: _____ ایالت: _____ کد پستی: _____
4. شماره تلفن (خانه): _____ (محل کار): _____
5. نام شخص مورد تبعیض (اگر غیر از شاکی باشد): _____

نام: _____
 نشانی: _____
 شهر: _____ ایالت: _____ کد پستی: _____

6. تبعیض بر چه اساس صورت گرفت؟ (همه مواردی که صدق می‌کنند را علامت بزنید)
- نژاد ☐ رنگ پوست ☐ خاستگاه ملی ☐

7. تاریخ حادثه منجر به تبعیض: _____

8. توضیح دهید که چگونه مورد تبعیض قرار گرفتید. چه اتفاقی افتاد و چه کسی مسئول آن بود؟ در صورت نیاز به قضای بیشتر، برگه‌های اضافی مورد استفاده را به پشت فرم الصاق کنید

9. نقش داشتند؟ RTD کدام نمایندگان

10. این حادثه در کجا اتفاق افتاد؟ لطفا مکان، شماره اتوبوس، نام راننده و غیره را ارائه دهید

11. شاهدان؟ لطفا اطلاعات تماس آن ها را ارائه کنید

نام: _____
نشانی: _____
شهر: _____ ایالت: _____ کد پستی: _____
شماره های تلفن: (خانه) _____ (محل کار): _____
پست الکترونیک: _____

نام: _____
نشانی: _____
شهر: _____ ایالت: _____ کد پستی: _____
شماره های تلفن: (خانه) _____ (محل کار): _____
پست الکترونیک: _____

نام: _____
نشانی: _____
شهر: _____ ایالت: _____ کد پستی: _____
شماره های تلفن: (خانه) _____ (محل کار): _____
پست الکترونیک: _____

12. آیا این شکایت را به هیچ یک از آژانس های فدرال، ایالتی یا محلی؛ یا یک دادگاه فدرال یا ایالتی تسلیم کرده اید؟

(گزینه مناسب را علامت بزنید) ☐ بلی ☐ خیر

اگر پاسخ مثبت است، هر آژانسی که شکایت را به آن تسلیم کرده اید علامت بزنید:

<input type="checkbox"/> آژانس فدرال	<input type="checkbox"/> دادگاه فدرال	<input type="checkbox"/> آژانس ایالتی
<input type="checkbox"/> دادگاه ایالتی	<input type="checkbox"/> آژانس محلی	<input type="checkbox"/> موارد دیگر

13. اطلاعات تماس رابط آژانسی که شکایت را به آن تسلیم کرده اید ارائه کنید:

نام: _____
نشانی: _____
شهر: _____ ایالت: _____ کد پستی: _____
تاریخ ثبت: _____

قسمت زیر شکایت را امضا کنید. هر مدرکی را که فکر می کنید شکایت شما را تایید می کند، پیوست کنید.

امضای شاکی

تاریخ امضا

Любое лицо, которое считает, что его или ее исключили из участия в программах, мероприятиях или услугах RTD или отказали в их предоставлении из-за дискриминации по признаку расы, цвета кожи или национального происхождения, может подать в RTD жалобу согласно Разделу VI.

Жалоба должна быть подана в течение 180 дней с момента предполагаемой дискриминации. RTD разрешает использовать представителя для подачи жалобы от имени заявителя. Вся коммуникация после рассмотрения жалобы будет направлена в первую очередь представителю заявителя, а во вторую очередь - заявителю.

После подачи жалобы RTD рассмотрит ее и определит, подпадает ли она под нашу юрисдикцию. Клиент получит письмо с уведомлением о том, будет ли жалоба рассматриваться RTD в течение семи (7) рабочих дней с момента подачи жалобы. Если RTD не установит более длительный срок, у заявителя будет десять (10) дней с даты письма для отправки запрашиваемой информации следователю RTD, назначенному на это дело.

Следователь может опросить всех лиц, указанных в качестве свидетелей, и любых других лиц, которые могут располагать информацией. Если для разрешения дела требуется дополнительная информация, RTD может связаться с заявителем или свидетелем. Если следователь RTD не связывается с заявителем или не получает дополнительную информацию в установленные сроки, RTD может закрыть дело в административном порядке. Дело может быть административно закрыто и в том случае, если заявитель больше не желает продолжать рассмотрение своего дела.

Как правило, RTD завершает расследование в течение шестидесяти (60) дней с момента получения заполненной формы жалобы. Хотя RTD стремится оперативно разрешить жалобы, этот процесс будет отличаться в зависимости от сложности жалобы, вовлеченных лиц и других факторов. По окончании расследования заявитель получит окончательное письмо с ответом на жалобу.

Если заявитель не согласен с решением RTD, он может потребовать повторного рассмотрения, подав запрос в письменном виде менеджеру по вопросам равноправия в транзите RTD в течение семи (7) дней после даты письма RTD с конкретным указанием основания для повторного рассмотрения. В течение десяти (10) дней менеджер по вопросам равноправия в транзите уведомит заявителя о своем решении принять или отклонить запрос на повторное рассмотрение. В случае положительного решения о пересмотре, менеджер по вопросам равноправия в транзите направит заявителю письмо с определением по завершении пересмотра.

Формуляр жалобы на дискриминационные действия согласно статьи VI



Статья VI Закона о гражданских правах от 1964 года гласит: “Ни один человек в Соединенных Штатах не может быть исключен из участия в программах или мероприятиях, получающих финансовую поддержку федерального правительства, лишен льгот или подвергнут дискриминации по признаку расовой принадлежности, цвета кожи или национальности”.

Для рассмотрения вашей жалобы, пожалуйста, предоставьте следующую информацию. Помощь предоставляется по запросу. Заполните этот формуляр и отправьте его по почте или доставьте по адресу:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202.
Вы можете связаться с нашим офисом с понедельника по пятницу с 8:00 до 17:00 по телефону 303-299-6000 или написать нам на электронную почту titlevicomplaints@rtd-denver.com.

1. Имя заявителя: _____
2. Адрес: _____
3. Город: _____ Штат: _____ Почтовый индекс: _____
4. Номер телефона (Домашний): _____ (Рабочий): _____
5. Лицо, по отношению к которому была проявлена дискриминация (если этим лицом не является заявитель):

Имя: _____
Адрес: _____
Город: _____ Штат: _____ Почтовый индекс: _____
6. На чем была основана дискриминация? (Отметьте все подходящие варианты)
☐ Расовая принадлежность ☐ Цвет кожи ☐ Национальность
7. Дата инцидента, приведшего к дискриминации: _____
8. Опишите, как вы подвергались дискриминации. Что произошло и кто был виноват? Если вам недостаточно места, прикрепите дополнительные листы бумаги или используйте обратную сторону формуляра.
9. Кто из представителей Регионального транспортного района был вовлечен в ситуацию?
10. Где произошел инцидент? Укажите местоположение, номер автобуса, имя водителя и т.д.

Формуляр жалобы на дискриминационные действия согласно статьи VI (страница 2)



11. Свидетели: Укажите их контактные данные.

Имя: _____

Адрес: _____

Город: _____ Штат: _____ Почтовый индекс: _____

Номера телефонов: (Домашний) _____ (Рабочий): _____

Адрес электронной почты: _____

Имя: _____

Адрес: _____

Город: _____ Штат: _____ Почтовый индекс: _____

Номера телефонов: (Домашний) _____ (Рабочий): _____

Адрес электронной почты: _____

Имя: _____

Адрес: _____

Город: _____ Штат: _____ Почтовый индекс: _____

Номера телефонов: (Домашний) _____ (Рабочий): _____

Адрес электронной почты: _____

12. Подавали ли вы эту жалобу в другое агентство федерального правительства, агентство штата или местное агентство; или в федеральный суд или суд штата?

(Поставьте галочку, где необходимо) _____ Да _____ Нет

Если вы ответили “да”, отметьте каждое учреждение, в которое была подана жалоба:

☐ Агентство федерального
правительства

☐ Федеральный суд

☐ Агентство штата

☐ Суд штата

☐ Местное агентство

☐ Другое

13. Укажите информацию о контактном лице агентства, в которое вы также подали жалобу:

Имя: _____

Адрес: _____

Город: _____ Штат: _____ Почтовый индекс: _____

Дата подачи жалобы: _____

Подпишите жалобу в указанном ниже месте. Приложите любые документы, которые, по вашему мнению, подтверждают вашу жалобу.

Подпись заявителя

Дата подписи

Qof walbo oo yaqiinsan in isaga ama iyada laga saaray ka-qaybgalka ama loo diiday dheefaha barnaamijyada, hawlaha, ama adeegyada RTD-da sababo la xiriira takoorka ku salaysan jinsiyadda, midabka ama waddanka uu ka soo jeedo wuxuu soo gudbin karaa cabashadan Title VI oo ay lasocoto RTD.

Cabashadu waa in lagu soo xareeyaa 180 maalmood gudahooda laga soo bilaabo taariikhda takoor ku eedeeynta. RTD-du waxay ogolanaysaa isticmaalka wakiilka si uu u xareeyo cabasho isagoo matalaya qofka ashtakoonaya. Dhammaan xiriirka ka dambeeya cabashada waxa lagu toosin doonaa wakiilka cabashada ugu horeyn kadibna ashtakoodaha marka labaad.

Marka cabashada la xareeyo, RTD-da waxay dib u eegi doontaa cabashada oo waxay go'aamin doontaa haddii aan awood u leenahay inaan sameyno xukunka. Macmiilku waxuu heli doonaa warqad qirasho ah oo ku wargelinaysa in cabashada ay RTD baari doonto gudaha todoba (7) maalmood ee shaqada laga bilaabo marka cabashada la xareeyay. Hadi aysan ka ahayn in wakhti dheer ay qeexdo RTD mooyaane, ashtakooduhu waxuu haysan doonaa toban (10) maalmood laga bilaabo taariikhda warqadda si uu ugu diro macluumaadka la codsaday baaraha RTD ee loo xilsaaray kiiska.

Baaruhu waxa uu waraysan karaa qof kasta oo lagu magac dhabo inuu yahay marqaati ahaan iyo cid kasta oo kale oo xog hayn karta. Haddii macluumaad dheeraad ah loo baahdo si kiiska loo xalliyo, RTD waxay la xiriiri kartaa ashtakoodaha ama markhaatiga. Haddii baaraha RTD aanu la xiriirin ashtakoodaha ama aanu ku helin macluumaadka dheeraadka ah ee wakhtiga loo baahan yahay gudahood, RTD waxa laga yaabaa inay maamul ahaan xirto kiiska. Kiisku sidoo kale waxaa laga yaabaa in loo xiro hab maamuleed haddii dacwooduhu/ashtakooduhu aanu doonayn inuu sii wado kiiskooda.

RTD waxay guud ahaan ku dhamaystiri doontaa baaritaanka lixdan (60) maalmood gudahooda laga soo bilaabo helista foomka cabashada ee la buuxiyay. In kastoo RTD ay ku dadaalayso inay si degdeg ah u xalliso cabashooyinka, habraacani wuu kala duwanaan doonaa iyadoo ku xiran kakanaanta cabashada, shakhsiyaadka ku lugta leh, iyo arrimo kale. Marka baaritaanka la soo gabagabeeyo, ashtakooduhu wuxuu heli doonaa warqadda jawaabta ugu dambeysa ee cabashada.

Haddii ashtakooduhu/dacwooduhu uu khilaaf go'aanka RTD, waxay codsan karaan dib-u-eegis iyagoo codsi qoraal ah ugu soo gudbinaya Maareeyaha Sinaanta Safrinta ee RTD (Transit Equity Manager) toddobo (7) maalmood gudahooda ka dib taariikhda warqadda RTD, iyagoo si gaar ah u sheegaya gundhigyada aasaasiga ee dib u eegista. Maareeyaha Sinaanta ee Safrinta ayaa ku wargelin doona ashtakoodaha go'aankooda ay ku aqbaleen ama ay ku diideen codsiga dib u eegista toban (10) maalmood gudahood. Kiisaska dib-u-eegida la ogolaado, Maareeyaha Sinaanta ee Safrinta ayaa gudoon siin doona ashtakoodaha/dacwoodaha warqada go'aan ka gaarista marka la dhammeeyo dib u eegista dib-u-hubinta.

Title VI (Cinwaanka VI) Foomka Cabashada



Title VI (Cinwaanka VI) ee Xeerka Xuquuqda Madaniga ah ee 1964 waxa uu dhigayaa “Ma jiro qof jooga Mareekanka oo, isir, midab ama wadanka uu u dhashay, lagaga saari karo, ka qaybqaadashada, loo diidi karo dheefaha, ama laguma takoori karo mid kasta barnaamijka ama hawlaha lagu helo kaalmada maaliyadeed ee federaalka.”

Fadlan ku buuxi macluumaadka soo socda ee lagama maarmaanka u ah si loo hawl-galiyi cabashadaada. Kaalmo ayaa la heli karaa marka la codsado. Buuxi foomkan oo boosto ugu dir ama gee:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202.
Waxaad kala xiriiri kartaa xafiiskeena Isniinta-Jimcaha 8-5 lambarka 303-299-6000, ama waxaad iimayl ahaan ugu diri kartaa xafiiskeena titlevicomplaints@rtd-denver.com.

1. Magaca qofka Cabanayo: _____
2. Cinwaanka: _____
3. Magaalo: _____ Gobal: _____ Zip Koodh: _____
4. Lambarka taleefoonka (Guriga): _____ (Ganacsi): _____
5. Qofka la takooray (haddii uusan ahayn qofka cabanaya)
Magaca: _____
Cinwaanka: _____
Magaalo: _____ Gobal: _____ Zip Koodh: _____
6. Maxuu ku salaysnaa takoorka? (Sax dhammaan kuwa khuseeya)
____ Isir ____ Midab ____ Wadan uu udhashay
7. Taariikhda dhacdada keentay takoorka: _____
8. Sharaxaad ka bixi sida lagu takooray. Maxaa dhacay yaana masuul ka ahaa? Wixii ah meel bannaan oo dheeraad ah, ku dheji xaashida dheeraad ag ee la isticmaalay gadaasha foomka.
9. Waa maxay wakiilada RTD ay ku lug lahaayeen?
10. Halkee ayay ka dhacday dhacdada? Fadlan qor goobta, lambarka baska, magaca darawalka, iwm.

Title VI (Cinwaanka VI) Foomka Cabashada (bogga 2)



11. Makhraati muu jiraa? Fadlan qor xogta lagula xiriiri karo.

Magaca: _____
Cinwaanka: _____
Magaalo: _____ Gobal: _____ Zip Koodh: _____
Lambarka Taleefanka: (Guriga) _____ (Ganacsi): _____
limayl: _____

Magaca: _____
Cinwaanka: _____
Magaalo: _____ Gobal: _____ Zip Koodh: _____
Lambarka Taleefanka: (Guriga) _____ (Ganacsi): _____
limayl: _____

Magaca: _____
Cinwaanka: _____
Magaalo: _____ Gobal: _____ Zip Koodh: _____
Lambarka Taleefanka: (Guriga) _____ (Ganacsi): _____
limayl: _____

12. Cabashadan ma u gudbisay golo kale oo ah federaal, gobol, ama wakaalad deegaanka; ama maxkamad federaal ama gobolka?

(Hubi meesha ku habboonee aad ku qori kartid) ____Haa ____Maya

Hadday jawaabtu haa tahay, sax cabashada wakaalad kasta oo loo gudbiyay:

- | | | |
|--|--|---|
| <input type="checkbox"/> Wakaalad Federaal | <input type="checkbox"/> Maxkamad Federaal | <input type="checkbox"/> Wakaalad Gobol |
| <input type="checkbox"/> Maxkamad Gobol | <input type="checkbox"/> Wakaalad Deegaan | <input type="checkbox"/> Mid kale |

13. Qor macluumaadka qofka lagala xiriiri karo wakaaladda aad sidoo kale u gudbisay cabashada:

Magaca: _____
Cinwaanka: _____
Magaalo: _____ Gobal: _____ Zip Koodh: _____
Taariikhda La gudbiyay: _____

Ka saxiix cabashada qaybta bannaan oo hoose ah. Ku lifaaq dukumeenti kasta oo aad aaminsan tahay inay kaalmaynayaan cabashadaada.

Saxiixa Qofka cabanayo

Taariikhda Saxiixa

Procedimiento para la presentación de quejas en virtud del Título VI

Toda persona que considere que ha sido excluida de la participación en los programas, actividades o servicios del Distrito de Transporte Regional (Regional Transportation District, RTD) o que se le han negado los beneficios de estos, debido a la discriminación por motivos de raza, color u origen nacional, puede presentar una queja en virtud del Título VI ante el RTD.

La queja debe presentarse en un plazo de 180 días a partir de la fecha de la supuesta discriminación. El RTD permite el uso de un representante para presentar una queja en nombre del denunciante. Toda la comunicación posterior a la queja presentada será dirigida al representante del denunciante en primer lugar y al denunciante en segundo lugar.

Una vez que se consigne la queja, el RTD la revisará y determinará si tenemos jurisdicción. El cliente recibirá una carta de acuse de recibo en la que se le informará si la queja será investigada por el RTD en un plazo de siete (7) días hábiles a partir de la presentación de esta. A menos que el RTD especifique un período más largo, el denunciante tendrá diez (10) días a partir de la fecha de la carta para enviar la información solicitada al investigador del RTD asignado al caso.

El investigador podrá entrevistar a las personas que se citaran como testigos y a cualquier otra persona que pueda tener información. Si se necesita más información para resolver el caso, el RTD puede ponerse en contacto con el denunciante o el testigo. Si el denunciante no se pone en contacto con el investigador del RTD o no recibe la información adicional dentro del plazo establecido, el RTD puede cerrar el caso a nivel administrativo. Un caso puede cerrarse en lo administrativo también si el denunciante no desea seguir con el mismo.

Por lo general, el RTD completará una investigación en un plazo de sesenta (60) días a partir de la recepción de un formulario de queja diligenciado. Aunque el RTD se esfuerza por resolver rápidamente las quejas, este proceso puede variar en función de la complejidad de la queja, las personas implicadas y otros factores. Una vez concluida la investigación, el denunciante recibirá una carta de respuesta final a su queja.

Si el denunciante no está de acuerdo con la decisión del RTD, puede solicitar una reconsideración presentando una solicitud por escrito al director de Equidad de Tránsito del RTD dentro de los siete (7) días siguientes a la fecha de la carta del RTD, indicando con precisión el fundamento de la reconsideración. El director de Equidad de Tránsito notificará al demandante su decisión de aceptar o rechazar la solicitud de reconsideración en un plazo de diez (10) días. En los casos en los que se conceda la reconsideración, el director de Equidad de Tránsito emitirá una carta de decisión al denunciante una vez finalizada la revisión de la reconsideración.

Formulario de queja del Título VI



El Título VI de la Ley de Derechos Civiles de 1964 establece que “ninguna persona en los Estados Unidos puede ser discriminada por motivos de raza, color o nacionalidad y excluida de acceder o participar de los beneficios de cualquier programa o actividad que reciba asistencia financiera federal.”

Proporcione la siguiente información necesaria para tramitar su queja. La asistencia está disponible bajo petición. Complete este formulario y envíelo por correo o entréguelo a:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31,
Denver, CO 80202. Puede contactarse con nuestra oficina de lunes a viernes de 8 a 5 al
303-299-6000 o puede enviar un correo electrónico a nuestra oficina a
titlevicomplaints@rtd-denver.com.

1. Nombre del denunciante: _____
2. Dirección: _____
3. Ciudad: _____ Estado: _____ Código postal: _____
4. Nro. de teléfono (casa): _____ (Comercial): _____
5. Persona discriminada (si no fuera del denunciante)
Nombre: _____
Dirección: _____
Ciudad: _____ Estado: _____ Código postal: _____
6. ¿En qué se basó la discriminación? (Marque todas las que correspondan)
☐ Raza ☐ Color ☐ Nacionalidad
7. Fecha del incidente que resultó en discriminación: _____
8. Describa cómo fue discriminado. ¿Qué pasó y quién fue el responsable? Si necesita espacio adicional, adjunte hojas adicionales o use la parte trasera del formulario.
9. ¿Qué representantes de RTD estuvieron involucrados?
10. ¿Dónde tuvo lugar el incidente? Proporcione la ubicación, el número del camión, el nombre de conductor, etc.

Formulario de denuncia del Título VI (página 2)



11. ¿Hubo testigos? Proporcione la información de contacto de los testigos.

Nombre: _____

Dirección: _____

Ciudad: _____ Estado: _____ Código postal: _____

Números de teléfono: (Casa) _____ (Comercial): _____

Correo electrónico: _____

Nombre: _____

Dirección: _____

Ciudad: _____ Estado: _____ Código postal: _____

Números de teléfono: (Casa) _____ (Comercial): _____

Correo electrónico: _____

Nombre: _____

Dirección: _____

Ciudad: _____ Estado: _____ Código postal: _____

Números de teléfono: (Casa) _____ (Comercial): _____

Correo electrónico: _____

12. ¿Presentó esta denuncia ante otra agencia federal, estatal o local o ante un tribunal federal o estatal?

(Marque el espacio que corresponda.) ☐ Sí ☐ No

Si la respuesta es sí, marque cada agencia en la que presentó una queja:

☐ Agencia federal

☐ Tribunal federal

☐ Agencia estatal

☐ Tribunal estatal

☐ Agencia local

☐ Otra

13. Proporcione información de la persona de contacto de la agencia ante la cual también presentó la queja:

Nombre: _____

Dirección: _____

Ciudad: _____ Estado: _____ Código postal: _____

Estado: Fecha en la que se presentó: _____

Firme la denuncia en el espacio de abajo. Adjunte cualquier documento que sirva para complementar su queja.

Firma del denunciante

Fecha de firma

Mtu yeyote anayeamini kuwa hajajumuishwa kwenye ushiriki au amenyimwa fidia za mipango, shughuli au huduma za RTD kutokana na ubaguzi kwa msingi wa mbari, rangi au asili ya taifa, anaweza kuwasilisha malalamishi ya Title VI kwa RTD.

Lazima malalamishi yawasilishwe ndani ya siku 180 kutoka tarehe ya ubaguzi unaodaiwa. RTD inaruhusu matumizi ya mwakilishi kuwasilisha malalamishi kwa niaba ya mlalamikaji. Mawasiliano yote kutokana na malalamishi yataelekezwa kwa mwakilishi wa mlalamikaji kwanza na baadaye kwa mlalamikaji.

Pindi malalamishi yanapowasilishwa, RTD itayapitia na kuamua ikiwa tuna mamlaka ya kisheria. Mteja atapokea barua ya uthibitishaji ikimfahamisha ikiwa malalamishi yatachunguzwa na RTD ndani ya siku saba (7) za kazi kutoka wakati malalamishi yaliwasilishwa. Isipokuwa kipindi kirefu kibainishwe na RTD, mlalamikaji atakuwa na siku kumi (10) kutoka tarehe ya barua kutuma maelezo yaliyooombwa kwa mchunguzi wa RTD aliyepewa jukumu la kusimamia kesi.

Mchunguzi anaweza kumhoji mtu yeyote aliyetajwa kuwa shahidi ambaye huenda akawa na taarifa. Ikiwa maelezo zaidi yanahitajika ili kusuluhisha kesi, RTD inaweza kuwasiliana na mlalamikaji au shahidi. Ikiwa mlalamikaji hatawasiliana na mchunguzi wa RTD au hatapokea maelezo zaidi ndani ya muda unaohitajika, RTD inaweza kuifunga kesi kulingana na sheria. Kesi inaweza kufungwa kisheria pia ikiwa mlalamikaji hana haja tena ya kuendelea na kesi yake.

RTD kwa jumla itakamilisha uchunguzi ndani ya siku sitini (60) kutoka wakati wa kupokea fomu ya malalamishi iliyojazwa kikamilifu. Ingawa RTD inajitahidi kusuluhisha malalamishi haraka, mchakato huu utatofautiana kutegemea na uzito wa malalamishi, wahuika na masuala mengine. Pindi uchunguzi unapokamilika, mlalamikaji atapokea barua ya majibu ya mwisho kuhusu malalamishi.

Ikiwa mlalamikaji hakubaliani na uamuzi wa RTD, anaweza kuomba tathmini kwa kuwasilisha ombi kwa Meneja wa RTD's Transit Equity kwa njia ya maandishi ndani ya siku saba (7) baada ya tarehe ya barua ya RTD, akitaja bayana msingi wa tathmini. Meneja wa Transit Equity atamwarifu mlalamikaji kuhusu uamuzi wao wa kukubali au kukataa tathmini ndani ya siku kumi (10). Katika hali ambapo tathmini inaruhusiwa, Meneja wa Transit Equity atampa mlalamikaji barua ya uamuzi baada ya kukamilisha mapitio ya tathmini.

Anwani VI Fomu ya Malalamiko



Anwani VI ya Sheria ya Haki ya Raia ya 1964 inasema kuwa “Hakuna mtu Marekani, kwa msingi wa mbari, rangi au taifa la asili, atatenganishwa na, kushiriki katika, kunyimwa manufaa ya, au kubaguliwa chini ya mpango wowote unaopokea usaidizi wa kifedha kutoka serikali ya ushirikisho.”

Tafadhali toa taarifa ifuatayo ambayo ni muhimu ili kuchakata malalamiko yako. Usaidizi unapatikana utakapoomba. Kamilisha fomu hii na kutituma au kuileta kwa:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202.
Unaweza kufika katika ofisi yetu Jumatatu hadi Ijumaa kuanzia saa 2 asubuhi hadi saa 11 jioni kupitia 303-299-6000, au unaweza kutumia ofisi yetu barua pepe kupitia titlevicomplaints@rtd-denver.com.

1. Jina la Mlalamikaji: _____
2. Anwani: _____
3. Jiji: _____ Jimbo: _____ Msimbo wa ZIP: _____
4. Nambari ya Simu (Nyumbani): _____ (Biashara): _____
5. Mtu aliyebaguliwa (iwapo ni tofauti na mlalamikaji)
Jina: _____
Anwani: _____
Jiji: _____ Jimbo: _____ Msimbo wa ZIP: _____
6. Ubaguzi huo ulikuwa unahusu nini? (Teua zote zinazotumika)
____ Mbari ____ Rangi ____ Taifa la Uasili
7. Tarehe ya tukio lililosababisha ubaguzi: _____
8. Fafanua jinsi ambavyo ulibaguliwa. Nini ilifanyika na ni nani alikuwa anawajibika? Kwa ajili ya nafasi zaidi, ambatisha karatasi za ziada nyuma ya fomu hii.
9. Wawakilishi wepi wa RTD walihusika?
10. Tukio hilo lilifanyika wapi? Tafadhali toa eneo, nambari ya basi, jina la dereva, n.k.

11. Mashahidi? Tafadhali toa maelezo yao ya mawasiliano.

Jina: _____

Anwani: _____

Jiji: _____ Jimbo: _____ Msimbo wa ZIP: _____

Nambari za Simu: (Nyumbani) _____ (Biashara): _____

Barua pepe: _____

Jina: _____

Anwani: _____

Jiji: _____ Jimbo: _____ Msimbo wa ZIP: _____

Nambari za Simu: (Nyumbani) _____ (Biashara): _____

Barua pepe: _____

Jina: _____

Anwani: _____

Jiji: _____ Jimbo: _____ Msimbo wa ZIP: _____

Nambari za Simu: (Nyumbani) _____ (Biashara): _____

Barua pepe: _____

12. Je, uliandikisha malalamiko haya na muungano, jimbo au shirika lingine la dani; au na mahakama ya muungano au jimbo?

(Weka alama kwenye nafasi inayofaa) _____ Ndiyo _____ La

Iwapo jibu ni ndiyo, weka alama kwenye kila shirika ambalo liliandikiwa mashtaka:

- | | | |
|--|---|---|
| <input type="checkbox"/> Shirika la Muungano | <input type="checkbox"/> Mahakama ya Muungano | <input type="checkbox"/> Shirika la Jimbo |
| <input type="checkbox"/> Mahakama ya Jimbo | <input type="checkbox"/> Shirika la Ndani | <input type="checkbox"/> Nyingine |

13. Tafadhali toa maelezo ya mawasiliano ya shirika ambalo uliandikisha malalamiko hayo nayo:

Jina: _____

Anwani: _____

Jiji: _____ Jimbo: _____ Msimbo wa ZIP: _____

Tarehe Uliyoandikisha: _____

Tia saina kwenye malalamiko hayo katika nafasi inayofuata. Ambatisha nyaraka zozote unazoamini kuwa zinaauni malalamiko yako.

Saina ya Mlalamikaji

Tarehe ya Saina

Ang sinumang taong naniniwalang ibinukod siya mula sa pakikilahok o tinanggihan siya ng mga benepisyo ng mga programa, aktibidad, o serbisyo ng RTD dahil sa diskriminasyon batay sa lahi, kulay o bansang pinagmulan, ay maaaring maghain ng reklamo sa Titulo VI sa RTD.

Dapat ihain ang reklamo sa loob ng 180 araw mula sa petsa ng ipinaparatang na diskriminasyon. Pinapahintulutan ng RTD ang paggamit ng kinatawan para maghain ng reklamo sa ngalan ng nagrereklamo. Ang lahat ng komunikasyon pagkatapos ng reklamo ay pangunahing ididirekta sa kinatawan ng nagrereklamo at sekundaryang ididirekta sa nagrereklamo.

Kapag naihain ang isang reklamo, susuriin ng RTD ang reklamo at tutukuyin kung mayroon kaming hurisdiksiyon. Makakatanggap ang kostumer ng sulat ng pagkilala na ipinapaalam sa kaniya kung iimbestigahan ng RTD ang reklamo sa loob ng pitong (7) araw ng negosyo mula noong inihain ang reklamo. Maliban kung tinukoy ng RTD ang mas mahabang panahon, magkakaroon ang nagrereklamo ng sampung (10) araw ng negosyo mula sa petsa ng sulat para ipadala ang hiniling na impormasyon sa imbestigador ng RTD na nakatalaga sa kaso.

Maaaring magkaroon ng panayam ang imbestigador sa sinumang indibidwal na pinangalanan bilang saksi at sinumang ibang indibidwal na maaaring may impormasyon. Kung kailangan ng higit pang impormasyon para lutasin ang kaso, maaaring makipag-ugnayan ang RTD sa nagrereklamo o saksi. Kung ang imbestigador ng RTD ay hindi tinawagan ng nagrereklamo o hindi nakatanggap ng karagdagang impormasyon sa loob ng kinakailangang timeline, maaaring isara ng RTD ang pangangasiwa sa kaso. Maaari ding isara ang pangangasiwa sa kaso kung ayaw nang ipagpatuloy ng nagrereklamo ang kaniyang kaso.

Sa pangkalahatan, kukumpleto ang RTD ng imbestigasyon sa loob ng animnapung (6) araw mula sa pagtanggap ng nakumpletong form ng reklamo. Bagaman nagsisikap ang RTD na agad na lutasin ang mga reklamo, mag-iiba ang prosesong ito depende sa pagiging komplikado ng reklamo, mga sangkot na indibidwal, at iba pang salik. Kapag natapos na ang imbestigasyon, makakatanggap ang nagrereklamo ng huling sulat ng tugon sa nagrereklamo.

Kung hindi sumasang-ayon ang nagrereklamo sa desisyon ng RTD, maaari siyang humiling ng muling pagsasaalang-alang sa pamamagitan ng pagsusumite ng kahilingan sa pamamagitan ng sulat sa Tagapamahala sa Pagiging Patas sa Transportasyon (Transit Equity Manager) ng RTD sa loob ng pitong (7) araw pagkatapos ng petsa ng sulat ng RTD, na partikular na tinutukoy ang batayan para sa muling pagsasaalang-alang. Aabisuhan ng Tagapamahala sa Pagiging Patas sa Transportasyon ang nagrereklamo tungkol sa kanilang desisyong tanggapin o tanggiin ang kahilingan para sa muling pagsasaalang-alang sa loob ng sampung (10) araw. Sa mga kaso kung saan nagbigay ng muling pagsasaalang-alang, magbibigay ang Tagapamahala sa Pagiging Patas sa Transportasyon ng sulat ng desisyon sa nagrereklamo pagkatapos makumpleto ng pagsusuri sa muling pagsasaalang-alang.

Title VI Form ng Reklamo



Ang Title VI ng Civil Rights Act ng 1964 ay nagsasaad na “Walang sinuman sa Estados Unidos ang, sa batayan ng lahi, kulay o bansang pinagmulan, ay hindi isasama sa, pakikilahok sa, pagkakaitan ng mga benepisyo ng, o sasailalim sa diskriminasyon sa ilalim ng anumang programa o aktibidad na tumatanggap ng tulong pinansyal ng pederal.”

Mangyaring ibigay ang sumusunod na impormasyong kinakailangan upang maproseso ang iyong reklamo. Ang tulong ay makukuha kapag hiniling. Kumpletuhin ang form na ito at ipadala o ipadala sa:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202.
Maaari kang makipag-ugnayan sa aming opisina Lunes-Biyernes mula 8-5 sa 303-299-6000, o maaari kang mag-email sa aming opisina sa titlevicomplaints@rtd-denver.com.

1. Pangalan ng Nagrereklamo: _____
2. Address: _____
3. Lungsod: _____ Estado: _____ Zip Code: _____
4. Numero ng Telepono (Tahanan): _____ (Negosyo): _____
5. Taong may diskriminasyon laban (kung maliban sa nagrereklamo)
Pangalan: _____
Address: _____
Lungsod: _____ Estado: _____ Zip Code: _____
6. Ano ang batayan ng diskriminasyon? (Lagyan ng check ang lahat ng naaangkop)
☐ Lahi ☐ Kulay ☐ Bansang Pinagmulan
7. Petsa ng insidente na nagreresulta sa diskriminasyon: _____
8. Ilarawan kung paano ka nadiskrimina. Ano ang nangyari at sino ang may pananagutan? Para sa karagdagang espasyo, maglakip ng karagdagang mga sheet ng papel sa likod ng form.
9. Anong mga kinatawan ng RTD ang kasangkot?
10. Saan naganap ang insidente? Mangyaring magbigay ng lokasyon, numero ng bus, pangalan ng mga driver, atbp.

Title VI Form ng Reklamo (pahina 2)



11. Mga saksi? Mangyaring ibigay ang kanilang impormasyon sa pakikipag-ugnayan.

Pangalan: _____

Address: _____

Lungsod: _____ Estado: _____ Zip Code: _____

Mga numero sa telepono: (Tahanan) _____ (Negosyo): _____

Email: _____

Pangalan: _____

Address: _____

Lungsod: _____ Estado: _____ Zip Code: _____

Mga numero sa telepono: (Tahanan) _____ (Negosyo): _____

Email: _____

Pangalan: _____

Address: _____

Lungsod: _____ Estado: _____ Zip Code: _____

Mga numero sa telepono: (Tahanan) _____ (Negosyo): _____

Email: _____

12. Isinampa mo ba ang reklamong ito sa ibang pederal, estado, o lokal na ahensya; o sa korte ng pederal o estado?

(I-check ang naaangkop na espasyo) _____ Oo _____ Hindi

Kung oo ang sagot, i-check ang bawat reklamo ng ahensya na isinampa sa:

- | | | |
|---|---|--|
| <input type="checkbox"/> Pederal na Ahensya | <input type="checkbox"/> Pederal na Hukuman | <input type="checkbox"/> Ahensya ng Estado |
| <input type="checkbox"/> Hukuman ng Estado | <input type="checkbox"/> Lokal na Ahensya | <input type="checkbox"/> Iba pa |

13. Magbigay ng impormasyon ng contact person para sa ahensya kung saan ka nagsampa ng reklamo:

Pangalan: _____

Address: _____

Lungsod: _____ Estado: _____ Zip Code: _____

Petsa ng Pag-file: _____

Lagdaan ang reklamo sa espasyo sa ibaba. Maglakip ng anumang mga dokumentong pinaniniwalaan mong sumusuporta sa iyong reklamo.

Lagda ng Nagrereklamo

Petsa ng Lagda

జాతి, రంగు లేదా జాతీయత ఆధారంగా RTD ప్రోగ్రామ్లు, కార్యకలాపాలు, లేదా సర్వీస్ల పాల్గొనడం నుంచి అతడు లేదా ఆమెని మినహాయించినట్లుగా లేదా ఏవైనా ప్రయోజనాలు నిరాకరించినట్లుగా ఎవరైనా వ్యక్తి విశ్వసించినట్లయితే, వారు RTDకి టైటిల్ VI ఫిర్యాదు చేయవచ్చు.

ఆరోపించిన వివక్ష తేదీ నుంచి 180 రోజుల్లోగా విధిగా ఫిర్యాదును నమోదు చేయాలి. ఫిర్యాదుదారుడి తరపున ఫిర్యాదు పైలు చేయడానికి ప్రతినిధిని ఉపయోగించడానికి RTD అనుమతిస్తుంది. ఫిర్యాదు అనంతరం మొత్తం కమ్యూనికేషన్ను ప్రాథమికంగా ఫిర్యాదుదారుడి ప్రతినిధికి తరువాత ఫిర్యాదుదారుడికి పంపుతుంది.

ఫిర్యాదు పైలు చేసిన తరువాత, RTD ఫిర్యాదును సమీక్షిస్తుంది, దానికి సంబంధించిన అధికారిక న్యాయపరిధి ఉన్నదా అని నిర్ధారిస్తుంది. ఫిర్యాదుదారుడు ఫిర్యాదు చేసినప్పటి నుంచి ఏడు (7) పనిదినాల్లోగా RTD ద్వారా ఫిర్యాదుపై దర్యాప్తు చేపట్టబడుతుందా లేదా అని సమాచారం ఇచ్చే ఎక్స్‌లెడ్జ్‌మెంట్ లేఖను ఫిర్యాదుదారుడు అందుకుంటాడు. RTD ద్వారా నిర్దిష్ట కాలవ్యవధిని పేర్కొనకపోతే, అభ్యర్థించిన సమాచారాన్ని ఫిర్యాదుదారుడు కేసును అసైన్ చేసిన RTD ఇన్వెస్టిగేటర్ నుంచి లేఖ అందుకున్న పది (10) రోజుల్లోగా పంపాల్సి ఉంటుంది.

సాక్షులుగా పేర్కొన్న ఎవరైనా వ్యక్తులను, సమాచారం ఉన్న ఎవరైనా ఇతర వ్యక్తులను ఇన్వెస్టిగేటర్ ఇంటర్వ్యూ చేయవచ్చు. కేసును పరిష్కరించడానికి మరింత సమయం అవసరం అయితే, ఫిర్యాదుదారుడు లేదా సాక్షిని RTD సంప్రదిస్తుంది. RTD ఇన్వెస్టిగేటర్‌ని ఫిర్యాదుదారుడు సంప్రదించలేకపోయినా లేదా నిర్ధారిత కాలవ్యవధిలోగా అవసరమైన సమాచారాన్ని పొందలేకపోయినట్లయితే, RTD అడ్మినిస్ట్రేటివ్ కేసును ముగించవచ్చు. ఫిర్యాదుదారుడు ఇకపై తమ కేసును కొనసాగించడానికి ఇష్టపడకపోయినా కూడా, కేసును అడ్మినిస్ట్రేటివ్ ముగించవచ్చు.

పూర్తి చేసిన ఫిర్యాదు ఫారం అందుకున్న అరవై (60) రోజుల్లోగా RTD సాధారణంగా తన దర్యాప్తును పూర్తి చేస్తుంది. RTD సకాలంలో ఫిర్యాదులను పరిష్కరించాలని కృషి చేసినప్పటికీ, ఫిర్యాదు సంక్లిష్టత, అందులో ఇమిడి ఉన్న వ్యక్తులు, ఇతర కారకాలపై ఆధారపడి ఈ ప్రక్రియ భిన్నంగా ఉంటుంది. దర్యాప్తు ముగిసిన తరువాత, ఫిర్యాదుదారుడు ఫిర్యాదుకు సంబంధించిన తుది ప్రతిస్పందన అందుకుంటాడు.

ఫిర్యాదుదారుడు RTD నిర్ణయంతో ఏకీభవించినట్లయితే, RTD లేఖ అందుకున్న ఏడు (7) రోజుల్లోగా, తిరిగి పరిశీలించడానికి ఆధారాన్ని ప్రత్యేకంగా పేర్కొంటూ RTD ట్రాన్సిట్ ఈక్విటీ మేనేజర్‌కు రాతపూర్వంగా ఒక అభ్యర్థన సబ్మిట్ చేయడం ద్వారా తిరిగి పరిశీలించాలని వారు అభ్యర్థించవచ్చు. తిరిగి పరిశీలించాలనే అభ్యర్థనను ఆమోదించడం లేదా తిరస్కరించడానికి సంబంధించిన తమ నిర్ణయాన్ని ట్రాన్సిట్ ఈక్విటీ మేనేజర్ పది (10) రోజుల్లోగా ఫిర్యాదుదారుడికి తెలియజేస్తారు. తిరిగి పరిశీలించడాన్ని మంజూరు చేసిన సందర్భాల్లో, పునఃపరిశీలన సమీక్ష పూర్తయిన తరువాత ట్రాన్సిట్ ఈక్విటీ మేనేజర్ ఫిర్యాదుదారుడికి ఒక నిర్ధారణ లేఖను జారీ చేస్తాడు.

1964 నాటి పౌర హక్కుల చట్టంలోని టైటిల్ VI ఏం చెప్తుందంటే, “అమెరికాలో నివసించే ఏ వ్యక్తి కూడా జాతి, రంగు, పుట్టిన దేశం అనే కారణాల చేత ఫెడరల్ ఆర్థిక సాయం అందుకునే ఏ పని లేదా ఏదేని కార్యక్రమంలో పాల్గొనకుండా చేయడం, ప్రయోజనాలు అందకుండా చేయడం, లేదా వివక్షకు గురి చేయడం వంటివి చేయరాదు.”

మీ ఫిర్యాదును ప్రాసెస్ చేసేందుకు దిగువ పేర్కొన్న సమాచారాన్ని దయచేసి అందించండి. విజ్ఞప్తి చేసినట్టు అయితే సాయం లభిస్తుంది. ఈ ఫామ్ నింపి దానిని మెయిల్ లేదా దిగువ చిరునామాకు పంపించండి:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202.
మా కార్యాలయాన్ని మీరు సోమవారం నుంచి శుక్రవారం 8-5 మధ్యన 303-299-6000 లో సంప్రదించవచ్చు. లేదా మా కార్యాలయానికి titlevicomplaints@rtd-denver.com ఈమెయిల్ చేయవచ్చు..

1. ఫిర్యాదిదారు పేరు: _____
2. చిరునామా: _____
3. నగరం: _____ రాష్ట్రం: _____ జిప్ కోడ్: _____
4. టెలిఫోన్ (నివాసం): _____ (వ్యాపారం): _____
5. ఏ వ్యక్తిపై వివక్ష చూపడం జరిగింది (ఒకవేళ ఫిర్యాదిదారు కానట్టు అయితే)
పేరు: _____
చిరునామా: _____
నగరం: _____ రాష్ట్రం: _____ జిప్ కోడ్: _____
6. వివక్ష దేనిపై ఆధారపడి ఉంది? (వర్తించే అన్నింటినీ చెక్ చేయండి)
_____ జాతి _____ రంగు _____ పుట్టిన దేశం
7. వివక్షకు దారితీసిన సంఘటన జరిగిన తేదీ: _____
8. మీపై జరిగిన వివక్షను తెలియజేయండి. ఏం జరిగింది, ఎవరు దానికి బాధ్యులు? మరింత సమాచారం తెలియజేసేందుకు అదనపు పేపర్ షీట్లు అటాచ్ చేయండి లేదా ఫామ్ వెనుక వైపు భాగాన్ని ఉపయోగించండి.
9. RTD ప్రతినిధుల ప్రమేయం ఎలా ఉంది?
10. ఈ ఘటన ఎక్కడ చోటు చేసుకుంది? ప్రదేశం, బస్సు నెంబర్, డ్రైవర్ పేరు వంటివి దయచేసి అందించండి.

11. సాక్షులు? వారిని సంప్రదించే సమాచారాన్ని అందించండి.

పేరు: _____

చిరునామా: _____

నగరం: _____ రాష్ట్రం: _____ జిప్ కోడ్: _____

టెలిఫోన్ నెంబర్లు: (నివాసం) _____ (వ్యాపారం): _____

ఈమెయిల్: _____

పేరు: _____

చిరునామా: _____

నగరం: _____ రాష్ట్రం: _____ జిప్ కోడ్: _____

టెలిఫోన్ నెంబర్లు: (నివాసం) _____ (వ్యాపారం): _____

ఈమెయిల్: _____

పేరు: _____

చిరునామా: _____

నగరం: _____ రాష్ట్రం: _____ జిప్ కోడ్: _____

టెలిఫోన్ నెంబర్లు: (నివాసం) _____ (వ్యాపారం): _____

ఈమెయిల్: _____

12. మీరు ఈ ఫిర్యాదును ఇతర ఫెడరల్, రాష్ట్ర లేదా స్థానిక ఏజెన్సీ లేదా ఫెడరల్ లేదా రాష్ట్ర కోర్టులో ఫైల్ చేశారా?

(తగిన ప్రదేశాన్ని చెక్ చేయండి) _____ అవును _____ కాదు

మీ సమాచారం అవును, ఏ ఏజెన్సీ దగ్గర ఫిర్యాదు ఫైల్ చేశారో చెక్ చేయండి:

- | | | |
|--|--|--|
| <input type="checkbox"/> ఫెడరల్ ఏజెన్సీ | <input type="checkbox"/> ఫెడరల్ కోర్టు | <input type="checkbox"/> రాష్ట్ర ఏజెన్సీ |
| <input type="checkbox"/> రాష్ట్ర న్యాయస్థానం | <input type="checkbox"/> స్థానిక ఏజెన్సీ | <input type="checkbox"/> ఇతరములు |

13. మీరు కూడా ఫిర్యాదు చేసిన విషయానికి సంబంధించి ఏజెన్సీకి సంప్రదించే వ్యక్తి సమాచారం అందించండి:

పేరు: _____

చిరునామా: _____

నగరం: _____ రాష్ట్రం: _____ జిప్ కోడ్: _____

ఫైల్ చేసిన తేదీ: _____

దిగువనున్న ఖాళీ స్థలంలో ఫిర్యాదు సంతకం చేయండి. మీ ఫిర్యాదుకు బలం చేకూర్చుతాయని మీరు భావించే డాక్యుమెంట్లు ఏమైనా ఉంటే దీనికి అటాచ్ చేయండి.

บุคคลใดที่เชื่อว่าตนถูกกีดกันไม่ให้เข้าร่วมหรือปฏิเสธการให้สิทธิประโยชน์ของโครงการ กิจกรรม หรือบริการของ RTD อันเนื่องมาจากการเลือกปฏิบัติด้วยเหตุด้านเชื้อชาติ สีผิว หรือถิ่นกำเนิด สามารถยื่นหนังสือร้องเรียน Title VI กับ RTD ได้

โดยจะต้องยื่นเรื่องร้องเรียนภายใน 180 วันนับจากวันที่กล่าวหาว่าเลือกปฏิบัติ RTD อนุญาตให้ใช้ตัวแทนยื่นเรื่องร้องเรียนในนามของผู้ร้องเรียนได้ การติดต่อสื่อสารทั้งหมดหลังจากการร้องเรียนจะถูกส่งไปยังตัวแทนของผู้ร้องเรียนเป็นหลักและถึงผู้ร้องเรียนเป็นลำดับที่สอง

เมื่อยื่นเรื่องร้องเรียนแล้ว RTD จะตรวจสอบข้อร้องเรียนนั้นและพิจารณาว่าเรามีอำนาจในการตัดสินหรือไม่ ลูกค้าน่าจะได้รับจดหมายตอบรับซึ่งจะแจ้งให้ทราบว่า RTD จะดำเนินการสอบสวนข้อร้องเรียนภายในเจ็ด (7) วันทำการนับจากวันที่ยื่นเรื่องร้องเรียนหรือไม่ ผู้ร้องเรียนจะมีเวลาสิบ (10) วันนับจากวันที่ในจดหมายเพื่อส่งข้อมูลที่ร้องขอให้ผู้สอบสวนของ RTD ที่ได้รับมอบหมายให้ดูแลกรณี เว้นแต่ RTD จะระบุระยะเวลาที่นานกว่านั้น

ผู้สอบสวนอาจสัมภาษณ์บุคคลใดที่มีชื่อเป็นพยานและบุคคลอื่นใดที่อาจมีข้อมูล หากต้องการข้อมูลเพิ่มเติมเพื่อคลี่คลายกรณีนั้น RTD อาจติดต่อผู้ร้องเรียนหรือพยาน หากผู้สอบสวนของ RTD ไม่ได้รับการติดต่อจากผู้ร้องเรียนหรือไม่ได้รับข้อมูลเพิ่มเติมภายในระยะเวลาที่กำหนด RTD สามารถปิดกรณีนั้น และยังสามารถปิดกรณีนั้นได้ด้วยหากผู้ร้องเรียนไม่ประสงค์จะดำเนินเรื่องต่อไป

โดยทั่วไป RTD จะดำเนินการสอบสวนให้เสร็จสิ้นภายในหกสิบ (60) วันนับจากวันที่ได้รับแบบฟอร์มหนังสือร้องเรียนที่กรอกข้อมูลครบถ้วน แม้ RTD จะพยายามคลี่คลายข้อร้องเรียนโดยทันที กระบวนการนี้ก็อาจแตกต่างกันไปตามแต่ความซับซ้อนของข้อร้องเรียน บุคคลที่เกี่ยวข้อง และปัจจัยอื่น ๆ เมื่อการสอบสวนสิ้นสุดลง ผู้ร้องเรียนจะได้รับจดหมายตอบกลับการร้องเรียนฉบับสุดท้าย

หากผู้ร้องเรียนไม่เห็นด้วยกับการตัดสินของ RTD ผู้ร้องเรียนสามารถขอให้มีการพิจารณาใหม่ได้โดยส่งคำขอเป็นลายลักษณ์อักษรไปยัง Transit Equity Manager ของ RTD ภายในเจ็ด (7) วันหลังจากวันที่ในจดหมายของ RTD ที่จะมีการระบุหลักเกณฑ์สำหรับการพิจารณาใหม่ไว้อย่างชัดเจน Transit Equity Manager จะแจ้งให้ผู้ร้องเรียนทราบถึงการตัดสินใจว่าจะยอมรับหรือปฏิเสธคำขอให้พิจารณาใหม่ภายในสิบ (10) วัน ในกรณีที่อนุญาตให้มีการพิจารณาใหม่ Transit Equity Manager จะออกหนังสือแจ้งผลการตัดสินถึงผู้ร้องเรียนเมื่อเสร็จสิ้นการพิจารณาทบทวนใหม่

บทที่ 6 แห่งพระราชบัญญัติสิทธิพลเมืองในคริสต์ศตวรรษที่ 1964 “จะไม่มีใครในสหรัฐอเมริกาไม่ว่าจะเป็นเชื้อชาติใด สัญชาติหรือผิวสีอะไรถูกกีดกันจากการมีส่วนร่วมหรือถูกปฏิเสธผลประโยชน์หรือถูกปฏิบัติภายใต้โครงการหรือกิจกรรมใดๆที่ได้รับเงินช่วยเหลือจากทางรัฐบาลกลาง”

โปรดระบุข้อมูลที่เป็นต่อไปนี้นำไปดำเนินการตามคำร้องของคุณ หากต้องการเรามีบริการช่วยเหลือ กรอกแบบฟอร์มนี้ให้เรียบร้อยแล้วและจัดส่งมาที่:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202
 คุณสามารถติดต่อมาที่ออฟฟิศของเราได้ในวันจันทร์-ศุกร์ ตั้งแต่ 8-5 ที่ 303-299-6000 หรือคุณสามารถอีเมลมาหาเราได้ที่ titlevicomplaints@rtd-denver.com

1. ชื่อผู้ร้องเรียน: _____
2. ที่อยู่: _____
3. เมือง: _____ รัฐ: _____ รหัสไปรษณีย์: _____
4. เบอร์โทรศัพท์ (บ้าน): _____ (ที่ทำงาน): _____
5. บุคคลที่ถูกเลือกปฏิบัติ (ถ้าไม่ใช่ผู้ร้องเรียน)
 ชื่อ: _____
 ที่อยู่: _____
 เมือง: _____ รัฐ: _____ รหัสไปรษณีย์: _____
6. ถูกเลือกปฏิบัติจากอะไรบ้าง (เลือกทุกข้อที่เกี่ยวข้อง)
☐ เชื้อชาติ ☐ สีผิว ☐ สัญชาติ
7. วันที่เกิดเหตุ: _____
8. อธิบายว่าคุณถูกเลือกปฏิบัติอย่างไร เกิดขึ้นได้อย่างไรและใครเป็นผู้รับผิดชอบ
 สำหรับรายละเอียดเพิ่มเติมให้แนบกระดาษที่มีรายละเอียดเพิ่มเติมมาด้านหลังแบบฟอร์ม
9. มีตัวแทน RTD เข้าไปมีส่วนเกี่ยวข้องอะไรบ้าง
10. เหตุเกิดขึ้นที่ไหน กรุณากรอกสถานที่ หมายเลขรถบัส ชื่อคนขับหรือรายละเอียดอื่นๆ

11. มีพยานหรือไหม กรุณาระบุข้อมูลการติดต่อ

ชื่อ: _____
 ที่อยู่: _____
 เมือง: _____ รัฐ: _____ รหัสไปรษณีย์: _____
 เบอร์โทรศัพท์: (บ้าน) _____ (ที่ทำงาน): _____
 อีเมล: _____

ชื่อ: _____
 ที่อยู่: _____
 เมือง: _____ รัฐ: _____ รหัสไปรษณีย์: _____
 เบอร์โทรศัพท์: (บ้าน) _____ (ที่ทำงาน): _____
 อีเมล: _____

ชื่อ: _____
 ที่อยู่: _____
 เมือง: _____ รัฐ: _____ รหัสไปรษณีย์: _____
 เบอร์โทรศัพท์: (บ้าน) _____ (ที่ทำงาน): _____
 อีเมล: _____

12. คุณได้ทำการยื่นร้องเรียนนี้กับหน่วยงานอื่นของรัฐ หน่วยงานท้องถิ่น หรือศาลระดับมลรัฐหรือศาลระดับสหพันธรัฐหรือไม่
 (เลือกหัวข้อที่ถูกต้อง) _____ ใช่ _____ ไม่ใช่

ถ้าคำตอบคือใช่ เลือกหน่วยงานที่ได้ทำการร้องเรียนไป:

- | | | |
|--|--|---|
| <input type="checkbox"/> หน่วยงานของรัฐบาลกลาง | <input type="checkbox"/> ศาลระดับสหพันธรัฐ | <input type="checkbox"/> หน่วยงานของรัฐ |
| <input type="checkbox"/> ศาลระดับมลรัฐ | <input type="checkbox"/> หน่วยงานท้องถิ่น | <input type="checkbox"/> อื่นๆ |

13. กรุณากรอกข้อมูลบุคคลของหน่วยงานที่คุณได้ยื่นร้องเรียนไป:

ชื่อ: _____
 ที่อยู่: _____
 เมือง: _____ รัฐ: _____ รหัสไปรษณีย์: _____
 วันที่ยื่น: _____

ลงชื่อผู้ร้องเรียนในช่องด้านล่าง. แนบเอกสารที่เชื่อว่าสนับสนุนการร้องเรียนของคุณมาด้วย

ชื่อผู้ร้องเรียน

วันที่ลงชื่อ

Mục VI Thủ tục Khiếu nại

Bất kỳ người nào tin rằng mình đã bị loại khỏi việc tham gia hoặc bị từ chối các lợi ích của các chương trình, hoạt động hoặc dịch vụ của RTD do phân biệt đối xử trên cơ sở chủng tộc, màu da hoặc nguồn gốc quốc gia có thể nộp đơn khiếu nại Mục VI với RTD.

Đơn khiếu nại phải được nộp trong vòng 180 ngày kể từ ngày bị cáo buộc phân biệt đối xử. RTD cho phép sử dụng đại diện để nộp đơn khiếu nại thay mặt cho người khiếu nại. Tất cả thông tin liên lạc sau khi khiếu nại sẽ chủ yếu được chuyển đến đại diện của người khiếu nại và người khiếu nại thứ hai.

Sau khi nộp đơn khiếu nại, RTD sẽ xem xét đơn khiếu nại và xác định xem chúng tôi có thẩm quyền giải quyết hay không. Khách hàng sẽ nhận được thư xác nhận thông báo cho họ biết liệu khiếu nại có được RTD điều tra hay không trong vòng bảy (7) ngày làm việc kể từ khi khiếu nại được nộp. Trừ khi RTD quy định một khoảng thời gian dài hơn, người khiếu nại sẽ có mười (10) ngày kể từ ngày nhận được thư yêu cầu thông tin cho điều tra viên RTD được chỉ định trong vụ việc.

Điều tra viên có thể phỏng vấn bất kỳ cá nhân nào có tên là nhân chứng và bất kỳ cá nhân nào khác có thể cung cấp thông tin. Nếu cần thêm thông tin để giải quyết vụ việc, RTD có thể liên hệ với người khiếu nại hoặc nhân chứng. Nếu người khiếu nại không liên hệ với điều tra viên của RTD hoặc không nhận được thông tin bổ sung trong thời hạn yêu cầu, RTD có thể đóng hồ sơ về mặt hành chính. Một vụ án cũng có thể bị kết thúc về mặt hành chính nếu người khiếu nại không còn muốn theo đuổi vụ việc của họ.

RTD nói chung sẽ hoàn tất cuộc điều tra trong vòng sáu mươi (60) ngày kể từ ngày nhận được đơn khiếu nại đã điền đầy đủ thông tin. Mặc dù RTD cố gắng giải quyết kịp thời các khiếu nại, quy trình này sẽ khác nhau tùy thuộc vào mức độ phức tạp của khiếu nại, các cá nhân liên quan và các yếu tố khác. Sau khi cuộc điều tra kết thúc, người khiếu nại sẽ nhận được thư phản hồi cuối cùng thông báo kết quả khiếu nại.

Nếu người khiếu nại không đồng ý với quyết định của RTD, họ có thể yêu cầu xem xét lại bằng cách gửi yêu cầu bằng văn bản đến Người quản lý Công bằng Chuyển tuyến của RTD trong vòng bảy (7) ngày sau ngày RTD gửi thư, nêu rõ cơ sở cụ thể để xem xét lại. Người quản lý Công bằng Chuyển tuyến sẽ thông báo cho người khiếu nại về quyết định chấp nhận hoặc từ chối yêu cầu xem xét lại của họ trong vòng mười (10) ngày. Trong trường hợp việc xem xét lại được chấp thuận, Người quản lý Công bằng Chuyển tuyến sẽ gửi thư xác định cho người khiếu nại sau khi hoàn thành việc xem xét lại.

Mẫu Giấy Khiếu Nại Tiêu Đề VI



Tiêu Đề VI của Đạo Luật Dân Quyền 1964 tuyên bố “Không một người nào tại Hoa Kỳ, vì lý do chủng tộc, màu da, hoặc nguồn gốc quốc gia, mà không được tham gia, bị khước từ nhận các phúc lợi, hoặc phải chịu sự phân biệt đối xử trong bất kỳ chương trình hay hoạt động nào được liên bang tài trợ.”

Xin vui lòng cung cấp thông tin cần thiết sau đây để xử lý khiếu nại của quý vị. Chúng tôi sẵn sàng giúp đỡ nếu quý vị có yêu cầu. Xin hoàn thành mẫu giấy này và gửi qua bưu tín hoặc giao đến:

Regional Transportation District, Transit Equity Office, 1660 Blake Street BLK-31, Denver, CO 80202. Quý vị có thể liên hệ với văn phòng chúng tôi từ thứ Hai - thứ Sáu từ 8 giờ sáng đến 5 giờ chiều theo số 303-299-6000, hoặc quý vị có thể gửi email cho văn phòng chúng tôi theo địa chỉ titlevicomplaints@rtd-denver.com.

1. Họ Tên Người Khiếu Nại: _____
2. Địa Chỉ: _____
3. Thành Phố: _____ Tiểu Bang: _____ Mã Zip: _____
4. Số Điện Thoại (Nhà Riêng): _____ (Nơi Làm Việc): _____
5. Người bị phân biệt đối xử (nếu không phải là người khiếu nại)
Họ Tên: _____
Địa Chỉ: _____
Thành Phố: _____ Tiểu Bang: _____ Mã Zip: _____
6. Lý do bị phân biệt đối xử? (Đánh dấu tất cả những mục thích hợp)
☐ Chủng Tộc ☐ Màu Da ☐ Nguồn Gốc Quốc Gia
7. Ngày xảy ra sự việc phân biệt đối xử: _____
8. Mô tả quý vị đã bị phân biệt đối xử như thế nào. Những gì đã xảy ra và người chịu trách nhiệm? Nếu cần thêm giấy, hãy đính kèm những tờ giấy bổ sung hoặc sử dụng mặt sau của mẫu này.
9. Những đại diện nào của RTD có liên quan?
10. Sự việc xảy ra ở đâu? Xin vui lòng cung cấp địa điểm, số xe bus, tên tài xế, vv.

11. Có nhân chứng không? Xin vui lòng cung cấp thông tin liên lạc của họ.

Họ Tên: _____

Địa Chỉ: _____

Thành Phố: _____ Tiểu Bang: _____ Mã Zip: _____

Số Điện Thoại: (Nhà Riêng) _____ (Nơi Làm Việc): _____

Email: _____

Họ Tên: _____

Địa Chỉ: _____

Thành Phố: _____ Tiểu Bang: _____ Mã Zip: _____

Số Điện Thoại: (Nhà Riêng) _____ (Nơi Làm Việc): _____

Email: _____

Họ Tên: _____

Địa Chỉ: _____

Thành Phố: _____ Tiểu Bang: _____ Mã Zip: _____

Số Điện Thoại: (Nhà Riêng) _____ (Nơi Làm Việc): _____

Email: _____

12. Quý vị đã nộp giấy khiếu nại này lên các cơ quan liên bang, tiểu bang, hoặc địa phương; hoặc đến một tòa án liên bang hoặc tiểu bang chưa?

(Đánh dấu vào mục thích hợp) ☐ Có ☐ Không

Nếu câu trả lời là có, hãy đánh dấu vào mỗi cơ quan quý vị đã nộp khiếu nại:

☐ Cơ Quan Liên Bang

☐ Tòa Án Liên Bang

☐ Cơ Quan Tiểu Bang

☐ Tòa Án Tiểu Bang

☐ Cơ Quan Địa Phương

☐ Khác

13. Vui lòng cung cấp thông tin của người liên lạc của cơ quan mà quý vị đã nộp khiếu nại:

Họ Tên: _____

Địa Chỉ: _____

Thành Phố: _____ Tiểu Bang: _____ Mã Zip: _____

Ngày Nộp: _____

Ký vào khoảng trống bên dưới. Đính kèm bất kỳ tài liệu nào mà quý vị cho rằng nó chứng minh cho khiếu nại của quý vị.

Chữ Ký Của Người Khiếu Nại

Chữ Ký Ngày

Attachment C

RTD Title VI Vehicle and Facility 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 including Title VI of the Civil Rights Act of 1964 and Colorado Revised Statutes 24-34-601. If you believe you have been subject to discrimination by an RTD employee, you may file a complaint no later than 180 calendar days after the date of the alleged discrimination with RTD.

For more information on RTD's nondiscrimination requirements, the complaint procedures, or if you would like information in a language other than English or Spanish, contact **303.299.6000**; email **titlevicomplaints@rtd-denver.com**; or visit **rtd-denver.com/titlevi**. Please allow up to three (3) business days for a response.

面向公众的民权通知: 请致电303.299.6000详细了解RTD的各项非歧视要求或请求语言协助服务。

THÔNG BÁO VỀ DÂN QUYỀN CHO CÔNG CHÚNG: Gọi 303.299.6000 để tìm hiểu thêm về các yêu cầu không phân biệt đối xử của RTD hoặc để yêu cầu các dịch vụ hỗ trợ ngôn ngữ.

RTD RESPETA LOS DERECHOS CIVILES

El Distrito de Transporte Regional (RTD, por sus siglas en inglés) opera sus programas y servicios sin tener en cuenta la raza, el color, el origen nacional o cualquier otra característica protegida por la ley, incluyendo el Título VI de la Ley de Derechos Civiles de 1964 y los Estatutos Revisados de Colorado 24-34-601. Si usted cree que ha sido objeto de discriminación por parte de un empleado de RTD, puede presentar una queja, a más tardar 180 días de calendario después de la fecha de la supuesta discriminación, ante RTD.

Para obtener más información sobre los requisitos de antidiscriminación de RTD, los procedimientos de queja, o si requiere información en un idioma que no sea inglés o español, llame al **303.299.6000**; envíe un correo electrónico a **titlevicomplaints@rtd-denver.com**; o visite **rtd-denver.com/titlevi**. Por favor, espere hasta tres (3) días hábiles para recibir una respuesta.



**ACCESSIBLE BY CHOICE,
NOT BY CHANCE.**

To report any ADA concerns or complaints, call RTD at **303.299.6000**, or fill out an online comment form at **rtd-denver.com/customer-comments**

RTD

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 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 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 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**.



Attachment D

RTD Transit Equity Nondiscrimination Policy Notice

Policy Name:	Transit Equity Nondiscrimination Policy				
Policy #:	RTD-CIV-PLY-0004	Date Issued:		Current Version:	A
General Manager Approval:					
Chief Administrative Officer Approval:					
Responsible Department:	Administration – Civil Rights Division – Transit Equity Office				

1. POLICY STATEMENT

The Regional Transportation District (RTD) has a strong commitment to civil rights and transit equity. As a public agency receiving federal financial assistance, and a place of public accommodation under Colorado law, it is the policy of RTD to ensure protected individuals and groups are entitled to enjoy RTD's programs, activities, facilities, and services on an equal basis and without discrimination.

Under Title VI of the Civil Rights Act of 1964 ("Title VI"), no person may be excluded from participation in, denied the benefit of, or be subjected to discrimination under any RTD program, service or activity because of race, color, national origin (including limited English proficiency).

Under Colorado Revised Statutes (C.R.S.) §24-34-601, a public accommodation is a place of business that offers services, facilities, privileges, advantages, or accommodations open to the public, including any public transportation facility or services. It is a discriminatory practice to refuse, withhold from, or deny an individual or group the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of a place of public accommodation based on race, color, national origin, creed, sex, sexual orientation, gender identity, gender expression, marital status, disability, or ancestry.

2. PURPOSE

The purpose of this policy is to communicate RTD's commitment to compliance with federal and state laws including Title VI and Colorado Revised Statutes §24-34-601, which prohibit discrimination under programs or activities receiving federal financial assistance and denial of full and equal enjoyment of RTD's services and transportation facilities.

3. SCOPE

This Policy applies to all RTD employees, contractors, and others engaged in business with RTD. It extends to all RTD programs, activities, services, and transportation facilities.

4. RESPONSIBILITIES

RTD and RTD employees are responsible for providing RTD programs, activities, services, and transportation facilities in a manner that allows all customers to use RTD programs, activities, services, and transportation facilities free from discrimination. The Transit Equity Office is charged with oversight and enforcement of this Policy.

5. RESOURCES

Transit Equity Complaint Management Procedure, RTD-CIV-PRC-0004

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REVISION BLOCK

Draft prepared by:			
Name	Signature	Position	Date
Carl Green Jr	Green, Carl - 24071 <small>Digitally signed by Green, Carl - 24071 Date: 2022.05.03 14:43:42 -0800</small>	Transit Equity Manager	3 May 3, 2022
Description of Revision(s):			
Reviewed by:			
Information Governance and Management Division Acceptance:			
Version:		Date issued:	

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Attachment E

RTD Public Participation Plan

2022 TITLE VI Public Participation Plan

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



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Title VI Public Participation Plan

Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD) functional mission to provide public transit service in the Denver region. An equitable public transit system fairly distributes the benefits and adverse effects of transit service without regard for race, color, national origin, or low-income status. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 pertaining to environmental justice.

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

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Environmental Justice. In this circular, the FTA requires that RTD document measures taken to comply with DOT's Title VI regulations by submitting a Title VI Program to the FTA every three years.

Included in this Title VI Program Update are a revised Public Participation Plan. This plan details how RTD engages Black, Indigenous, and People of Color (BIPOC), low-income populations, and populations that are English Language Learners (ELL). The Public Participation Plan also describes RTD's approach to achieving diversity on its non-elected advisory committee(s).

Public Engagement Overview

As a federally funded public transit agency, the Regional Transportation District (RTD) works to ensure that we are engaging our stakeholders in an authentic manner. We understand that many of our customers are transit dependent and rely solely on the service we provided. Our intention is to meet the customers where they are, where they live and where they work, a tenet of RTD. As an agency, we are collectively moving in a direction that meets stakeholders where they are so that we can fully understand their needs, to provide the best service with the most benefit. We will do this by engaging all stakeholders, specifically our most vulnerable and underserved populations, in the public decision-making process. As an agency, we want to ensure that we are moving in a direction that builds, establishes and maintains trust amongst all our stakeholders. Our future is in the direction of equity in transit, to be a catalyst for leadership in the engagement of BIPOC and low-income populations.

As an agency, RTD works to incorporate effective, responsive public engagement into its core mission of providing safe, clean, efficient, affordable and reliable bus and rail service to all passengers. Our 15-member

Title VI Public Participation Plan

Board of Directors, senior managers and employees play a critical role in responding as quickly as possible to the questions, concerns and transit needs of the entire region. Engaging effectively with customers, stakeholders and the public through our decision-making processes and day-to-day services are important goals.

The agency's objective is to establish a more robust public engagement strategy with the ultimate goal of forging positive new relationships and strengthening existing relationships with customers and stakeholders. Pre-pandemic, RTD saw nearly 100 million passenger boardings in a 2,340-square-mile service area—one of the largest in the United States—and serves 2.87 million citizens in 40 municipalities in the diverse counties of Boulder, Broomfield, Denver, Jefferson, Adams, Arapahoe, Douglas and Weld. Our customers and stakeholders depend on us to keep them informed of new technology, proposed service and fare changes and major policy decisions.

Involved in this agency-wide effort are transit equity staff, bus and train operators; fare enforcement officers; service planners; marketing executives; urban planners; project engineers; sustainability strategists; customer care agents; other civil rights managers (Americans with Disabilities Act, Equal Employment Opportunity, Small Business); event planners; public relations staff; senior managers and the RTD Board of Directors.

RTD's Title VI program will also play a leading role in this effort by identifying, reaching out to and working with transit-reliant communities, including low-income customers, BIPOC and English Language Learner (ELL) communities living and working in all eight counties served by the RTD transit system.

This document outlines our target audiences, departments responsible for informing and engaging with the public, and existing and desired public outreach strategies we hope to implement over the next several years.

RTD's Target Audiences

- Title VI-protected populations, including minority populations and English Language Learners
- Everyday customers
- Frontline staff, including bus and train operators
- Business community, including small (SBE) and disadvantaged (DBE) business enterprises
- Community groups, nonprofits, and community-based organizations
- Local governments and stakeholder groups
- Neighborhood associations
- Prospective program participants
- RTD Board of Directors and senior leadership team
- School districts and colleges
- Transportation management associations (TMAs) and organizations (TMOs)

Title VI Public Participation Plan

Existing Public Outreach

Public Relations and Community Engagement Division

Public Relations responds to formal (open record) and informal requests for information from the news media, the general public, elected officials and other stakeholders about RTD operations. The department takes the lead on strategic communication and public outreach to advance the RTD name, brand and reputation and develops crisis communication strategies. The Public Relations and Community Engagement plan, organize and staff dozens of annual and special public events and gives public presentations around the Denver metro region. They produce magazine stories for transportation trade publications; newspaper op-ed pieces; speeches; talking points for media spokespeople; fact sheets; communication plans; news releases; media advisories; blog columns; web content; e-blasts; invitations; video scripts and storytelling; newsletters; and other communication collateral designed to relay essential messages to employees, board directors, senior managers, stakeholders, customers and the general public. They also act as communication liaisons for all RTD divisions.

Marketing

The RTD Marketing department oversees the creation of all advertising, marketing and public outreach materials for public relations, public information and other departments, and develops effective messaging to keep the public, stakeholders, employees and the RTD Board of Directors apprised of all important agency initiatives. Marketing is also highly involved in promotional special events related to RTD anniversaries, customer appreciation events, station parties along new transit corridors and the openings of new transit facilities. It oversees customer satisfaction and market research, and leads efforts to improve RTD's Nonprofit Program, which provides millions of dollars' worth of free and reduced fares for nonprofits serving low-income, homeless and other transit reliant customers. Marketing account executives work closely with other RTD departments to produce or order brochures, posters, maps, fliers, promotional giveaways and other print materials that help the agency keep the public informed of all initiatives. The department also leads digital marketing efforts such as the maintenance and updating of the RTD website, blogs, and the agency's social media channels, communicates directly with customers and stakeholders through a database, and leads public communication efforts on technology rollouts.

Customer Care

Customer Care encompasses more than the Telephone Information Center; which is the largest part of the division, which also operates the Sales outlets at Boulder, Denver Union Station, Civic Center Station, and Denver International Airport. In addition, the Customer Care Division Liaisons receive field complaints called into the Telephone Information Center, comments from the website and social media, which are entered by the Digital Customer Relations Liaisons, provide information to customers, and others seeking information about the agency's fares, services, and policies. Customer Care agents are available 6 a.m. to 6 p.m., Monday through Friday, and 9 a.m. to 6p.m. on Saturdays. The agency's customer service representatives are at the frontline of RTD's efforts to keep the public informed of its operations, technology, service hours, and many other agency initiatives.

Title VI Public Participation Plan

Service Planning

Service Planning oversees the scheduling of all bus and rail operations for the RTD system. The division reaches out to the public three times a year (and more when new transit corridors open) when it is planning system-wide and targeted service changes. Federal regulations require that RTD notify the public of proposed service changes when they affect 25 percent or more of a service route's hours. Service Planning's approach to public engagement entails public meetings in communities where service changes are under consideration. The division also schedules meetings at RTD headquarters at noon and again at 6 p.m. to give customers who work in the downtown area opportunities to offer input on proposed service changes. RTD is required to advertise public meetings two weeks before they take place. RTD is required to notify the public of service changes six weeks before they go into effect. Upon request, Service Planning provides interpretation for Spanish speakers and the deaf and hard-of-hearing. The division works closely with marketing to publicize public meetings in local newspapers and via trans-flux window clings hung in all RTD vehicles. The division also notifies local municipalities of proposed service changes, which is a requirement of Federal Transit Administration (FTA) Title VI regulations.

Special Services

This department within the Service Planning Division is responsible for working with the public to ensure RTD meets the needs of passengers with disabilities through its Access-a-Ride and Call-n-Ride services. The Special Services manager engages with the public regularly and proactively and upon request by advocacy groups that want to ensure RTD is complying with federal ADA requirements.

Transit-Oriented Communities Division

This Planning Department engages in public engagement through its Transit-Oriented Communities Division. Staff members excel at articulating public impact issues surrounding the planning, construction and implementation of new transit corridors and are highly involved with policy development and other efforts geared toward layering public input into their decision-making process. As an example, the Planning Division oversaw RTD's 2019 Pass Program Study, which included management of the Pass Program Working Group and the development of the final fare change proposal.

Civil Rights Division

The Civil Rights Division is highly involved with public engagement through its Transit Equity Office (TEO), Small Business Office (SBO) and its Americans with Disabilities Act (ADA) Office. The Transit Equity Office oversees the Title VI Program, which includes the Public Participation Plan and Language Access Plan. TEO staff ensure RTD is compliant with federal regulations designed to incorporate the needs and viewpoints of communities of color and low-income and ELL communities. The SBO oversees the division's monthly small and disadvantage firms contract participation, where RTD staff monitors DBEs and SBEs compliance programs. Also invites any potential subcontractor, (DBE's, SBE's and non-certified firms) to attend the Disadvantaged and Small Business Enterprise Advisory Council (DBEAC) meeting that occurs every other month, where SBO explaining potential

Title VI Public Participation Plan

contract opportunities on projects and/or to provide maintenance services to RTD through its procurement office. Civil Rights staff attends local, regional and national networking events to stay abreast of industry trends, issues and regulations and hosts its own events to keep the community informed of RTD’s efforts to support and advance the success of small businesses—and communities and individuals in the process—across the district. The division’s ADA Manager’s Office oversees RTD’s compliance with Title’s I & II of the Americans with Disabilities Act (ADA). In addition to these efforts the ADA office also assists with proactive efforts through public information and collaboration, complementary paratransit service, and accessibility to vehicles/facilities/transit. This includes the newly created RTD Advisory Committee for People with Disabilities and Access-a-Ride Paratransit Advisory Committee. As members for these committees are selected, RTD will seek to recruit a diverse representation of the community.

Board of Directors Office

The RTD Board of Directors is a publicly elected governing board whose members serve four-year terms up to two terms in a row. Members represent RTD’s 15 districts across the eight-county Denver metropolitan region. The board interacts with the public regularly during its weekly public meetings, at special events and on a one-on-one basis with community, business and trade groups, stakeholders and individual constituents. Members also submit op-ed pieces to local newspapers, give speeches at special events, and respond to public inquiries at board meetings.

Table 1. RTD Board of Directors Demographic Breakdown

Race/Ethnicity	Percentage of Representation
<i>African American/Black</i>	7%
<i>Asian/ Pacific Islander</i>	0%
<i>Caucasian/White</i>	87%
<i>Hispanic/Latino</i>	7%
<i>Native American/ American Indian</i>	0%
<i>Other</i>	0%

RTD Advisory Boards and Committees

RTD believes in and is committed to the public involvement process including the use of community advisory committees, panels and boards. Each advisory group is tailored to meet the specific needs of its program or activity. During the formation of these advisory groups, RTD consistently seeks participation from minorities by directly soliciting organizations which represent minorities. Currently, RTD appoints members of the public to the following advisory groups/committees.

Title VI Public Participation Plan

Citizens Advisory Committee (CAC)

The RTD Citizens Advisory Committee (CAC) monitors and provides region-oriented advice on the FasTracks Plan and RTD's strategic plan. It represents citizen and community perspectives on transit issues, and promotes public awareness of RTD's programs, services and projects. The 17-member volunteer committee represents a cross-section of the region's population and holds monthly work sessions in pursuit of the following:

1. Continue to monitor improvements for each corridor in the FasTracks Plan.
2. Become familiar with the District's strategic plan and long-term vision.
3. Provide region-oriented advice to RTD regarding the implementation of the strategic plan, its strategies and initiatives.
4. Represent the citizen perspective on behalf of a wide range of stakeholder interests and community organizations.
5. Gather information from community members to share with the agency.
6. Share information with community members to promote public awareness of the agency's programs and projects.

Other tasks as assigned by the RTD Board of Directors.

1. Recruitment for committee members is publicly advertised through the RTD Web site, local publications, and stakeholder e-mail distributions. Applicants submit a one-page letter stating their interest in being considered for membership, specific qualifications for serving on the committee, and highlights of related experience and expertise, along with a resume if available.
2. A five-member nominating committee reviews the applications and forwards a slate of candidates to the Board of Directors for appointment.
3. The nominating committee consists of the following positions:
4. RTD Board Chairman or Board member designee
5. RTD FasTracks Monitoring Committee Chair or Board member designee
6. RTD General Manager or staff designee (Transit Equity Manager appointed in 2022)
7. RTD Assistant General Manager for Planning or staff designee
8. RTD Public Information/Public Involvement Consultant liaison (will provide administrative support and serve as a non-voting member of the nominating committee)
9. Appointments are made to ensure a broad representation of stakeholder interests, to achieve diversity, and to provide geographical representation within the district.

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Table 2. Citizens Advisory Committee Demographic Breakdown

Race/Ethnicity	Percentage of Representation
<i>African American/Black</i>	6%
<i>Asian/ Pacific Islander</i>	6%
<i>Caucasian/White</i>	88%
<i>Hispanic/Latino</i>	0%
<i>Native American/ American Indian</i>	0%
<i>Other</i>	0%

Advisory Committee for People with Disabilities

The RTD Advisory Committee for People with Disabilities (ACPD) help to implement positive change to all of RTD services and programs. In addition, it will ensure and guide RTD's commitment to people with disabilities and the community overall. Moreover, this 13-member volunteer committee works to make RTD's bus and train operations responsive to the needs of customers who are living with disabilities. The ACPD will be advisory in nature, report to an internal RTD ADA steering committee.

Table 3. RTD ACPD Demographic Breakdown

Race/Ethnicity	Percentage of Representation
<i>African American/Black</i>	6%
<i>Asian/ Pacific Islander</i>	0%
<i>Caucasian/White</i>	88%
<i>Hispanic/Latino</i>	6%
<i>Native American/ American Indian</i>	0%
<i>Other</i>	0%

RTD Engagement Next Steps

RTD's Public Participation Plan (PPP) is intended to guide ongoing public involvement to ensure the most effective means of providing information and receiving public input on transportation issues, with particular emphasis on involving traditionally under-represented groups.

Title VI Public Participation Plan

It is an exciting time for RTD as we pursue new and innovative transportation solutions to meet the needs of the region. New long-range planning initiatives, 2022 systemwide fare study and equity analysis, ongoing service changes, and partnerships with private and public transportation interests are great initiatives catalyzing major changes for RTD. These initiatives also come with the risk of unintentional and unjustifiable exclusion, based on race, color, national origin and income status. RTD will mitigate this risk by establishing goals, implementing an inclusive decision-making framework, and utilizing methods and guiding questions.

In order to implement a Public Participation Plan and its meaning, we must first set goals to accomplish our work within the community, by setting up strategies, support systems, ongoing partnerships and commitment from staff. Establishing goals will provide guidance and direction to better serve and engage the community in decision-making during all phases of transportation projects and planning issues.

Goal 1 – Create meaningful participation opportunities within the community

- Commit to using innovative public outreach tools and techniques to inform the public and encourage them to stay involved in planning processes and other initiatives

Goal 2 – Set a standard of inclusiveness for marginalized communities

- Be intentional in recruiting and involving underserved and underprivileged groups

Goal 3 – Create partnerships with community leaders and community-based organization

- Build and develop relationships with community stakeholders who represent underrepresented communities

The standardization of goals holds a sense of accountability and builds awareness, participation, and support. Thus, allowing for collaboration, which will ensure meaningful engagement and successful outcomes.

Inclusive Decision-Making Framework

The Transit Equity Office will lead the development and implementation of the Inclusive Decision-Making Framework. The framework establishes a set of principles that will address these challenges and aim to consult a full spectrum of the public before RTD makes critical decisions. It is expected that departments within RTD will utilize this framework more than others based on the quantity of critical decisions made within each department. Critical decision includes long range planning projects, fare changes, service changes, and other projects that have a significant impact on the communities we serve. Some of the benefits of the framework include building collective understanding and agreement, informing historically underserved populations, enhancing board approval, legal risk mitigation, ensuring compliance with Title VI and relevant regulatory guidance, and increasing public involvement and satisfaction.

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The basis of this framework works to center historically underserved populations in decision-making processes from the beginning and interweaves lived experiences into the technical planning process. It also works to actively remove barriers of engagement by carefully evaluating the needs of the socially diverse communities that RTD serves. The table 4 below shows the description of what the framework entails.

Table 4. Framework Details

Component	Description
Trust and Transparency	Partner with community-based organizations (CBO) and community leaders to bridge existing divisions. Be clear about the process, limitations, and provide a public record of all organizers, outcomes, and range of ideas expressed.
Openness and Learning	Ensure all involved listen to each other, explore new ideas unconstrained by predetermined outcomes, learn and apply information in ways that generate new options, and regularly evaluate for effectiveness.
Culturally Competent	Know the historic context of communities and base engagement practices on sociocultural needs. Ensure information and input methods are accessible with public friendly language, translated documents, interpretation services, accessible meeting times, and through offering alternative forms of participation.
Demographically Diverse and Inclusive	Seek and invite historically underserved populations potentially affected by the critical decision to be made. Targeted outreach will evaluate for sociocultural relevant methods of outreach.
Impact and Action	Ensure each participatory effort has potentially to make a real difference in decision making, and that participants are aware of that potential.

Methods, Guiding Questions, and Best Practices

Methods

Effective public involvement requires that the agency be as inclusive as possible to serve the widest range of customers. Therefore, the following will support staff with an inclusive community engagement strategy to better engage with historically underrepresented customers:

- Schedule public meetings at appropriate times based on feedback from community
- Build relationships with community-based organizations and staff who work closely with underrepresented populations
- Include one-on-one meetings and interviews with local community groups/leaders
- Provide information in various languages or notice of language assistance
- Utilize the Language Access Plan to ensure meaningful participation and involvement

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- Conduct outreach by attending school events, town halls, community meetings, senior centers, recreational facilities, colleges, places of worship, festivals, sports activities, and tribal meetings
- Provide incentives such as child-care, free ride coupons, financial incentives

Guiding Questions

Prior to seeking input from targeted communities, the following questions can be used as a guide when tailoring public involvement strategies for projects or initiatives.

1. What are the key demographics of this community?
2. What is the history of this community and how it was formed?
3. Have the demographics shifted over time? If so, how have they and what were the factors for his shift?
4. Was this community benefited or burdened by redlining?
5. What are the most effective ways to engage this community?
 - a. Key methods (in person, online, phone, other)
6. Is there a need for translated materials and/or an interpreter?
7. Are the documents put forth in language that this community can understand? For example, are transit terms either defined or simplified for the general public's understanding?
8. What are other effective ways that could include this community?

Best Practices: Community Based Organizations Contracts

Both unintentional and intentional harms have been created from decisions made by various public and private institutions to historically underserved communities. Recognizing that mistrust can be a barrier to public participation, partnering with local community-based organizations (CBOs) can lessen mistrust and create more opportunities to have meaningful participation.

RTD has establish Multicultural Outreach and Engagement Services contracts with a select number of CBOs to enhance engagement efforts with historically underrepresented communities. The launch and implementation of these contracts will be utilized to support and guide engagement and public involvement for current and future RTD projects. Overall, the goal is to strengthen relationships between RTD and the community.

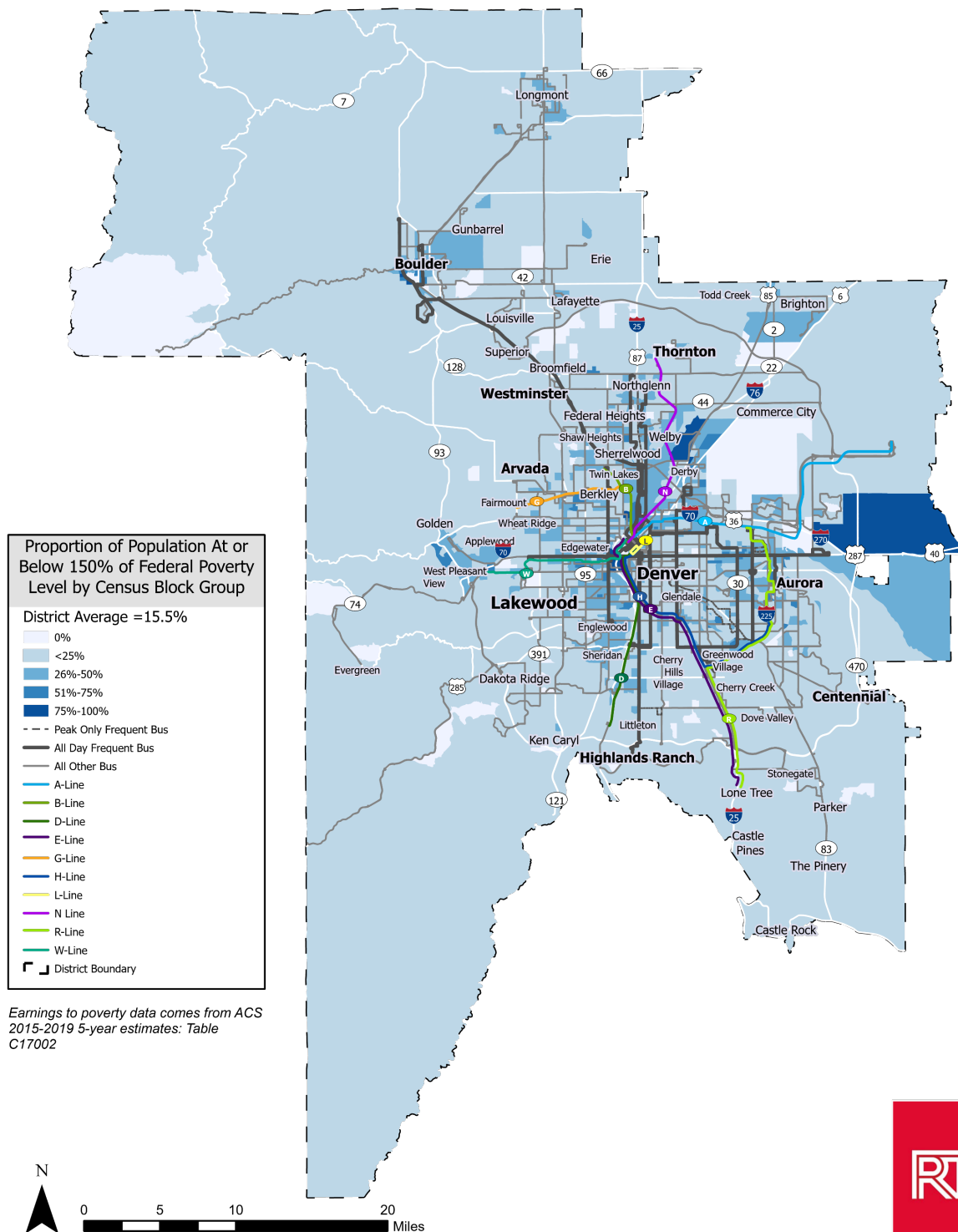
Best Practices: Title VI Demographic Maps

The use of Title VI maps can support agency staff with targeted outreach to low-income (see Exhibit 1) and minority (see Exhibit 2) communities by illustrating areas where there are high concentrations of these populations.

Title VI Public Participation Plan

Exhibit 1 (Low-Income Population)

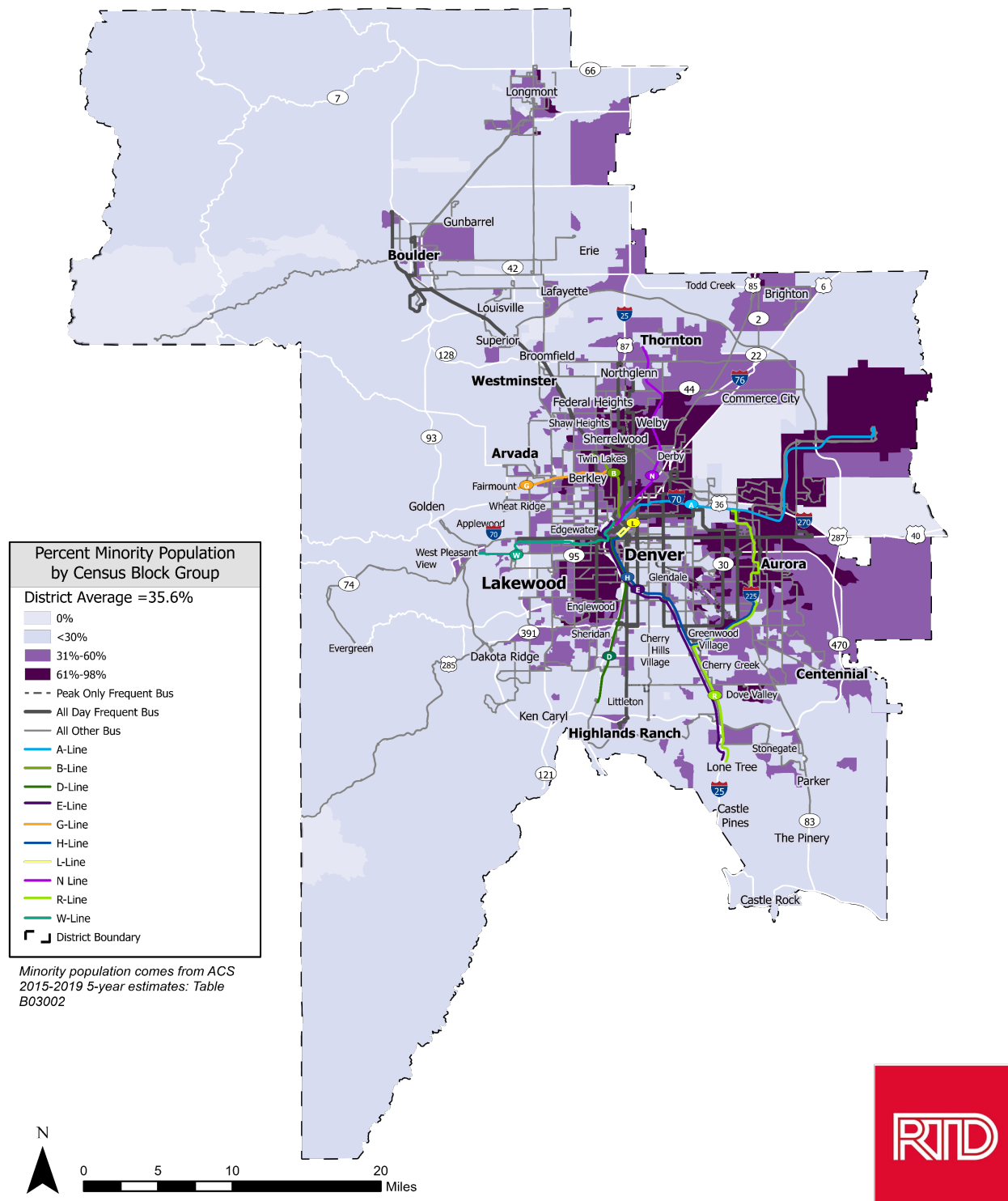
Service and Service Area with Low Income Population



Title VI Public Participation Plan

Exhibit 2 (Minority Population)

Service and Service Area with Minority Population



Attachment F

Language Access Plan and Implementation Schedule

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

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.

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 populations.

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.

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- **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

2022 Language Access Plan



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

2022 Language Access Plan

access is one 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



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.

2022 Language Access Plan

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

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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 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 languages² 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).

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

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

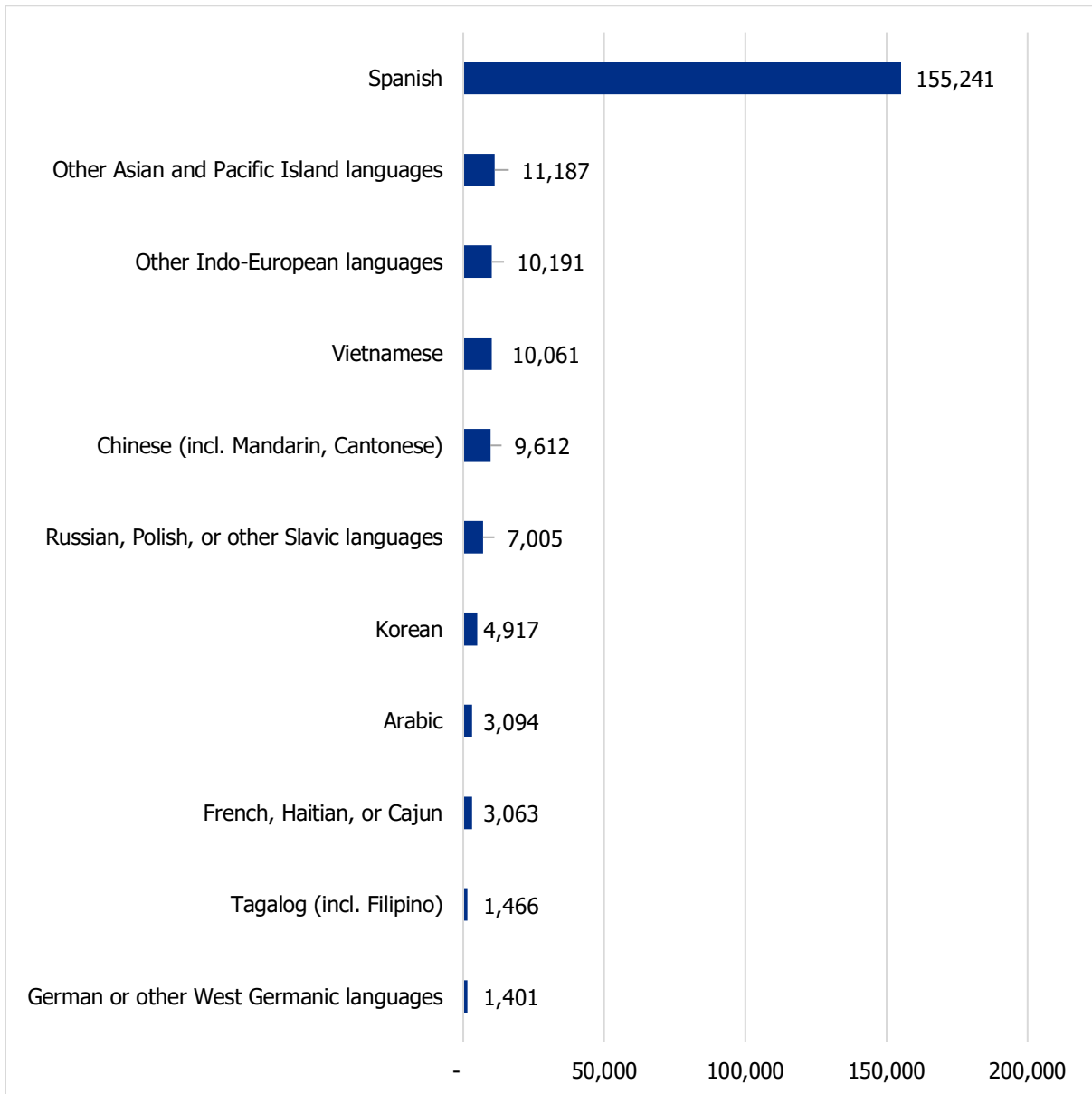
⁵ American Community Survey DP02 2020 Selected Social Characteristics in the United States: Foreign Born

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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 $\geq 1,000$



*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

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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.

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+)

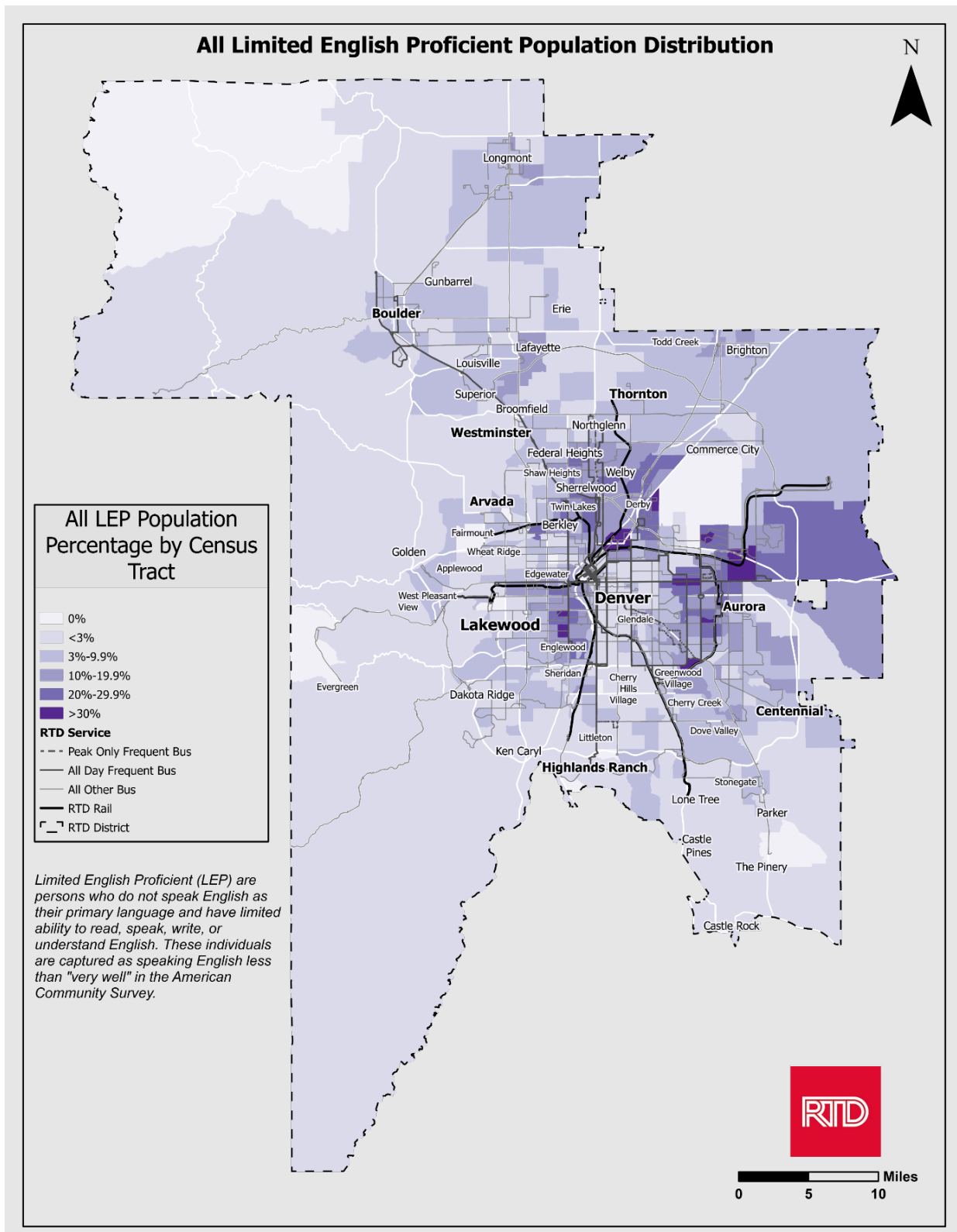
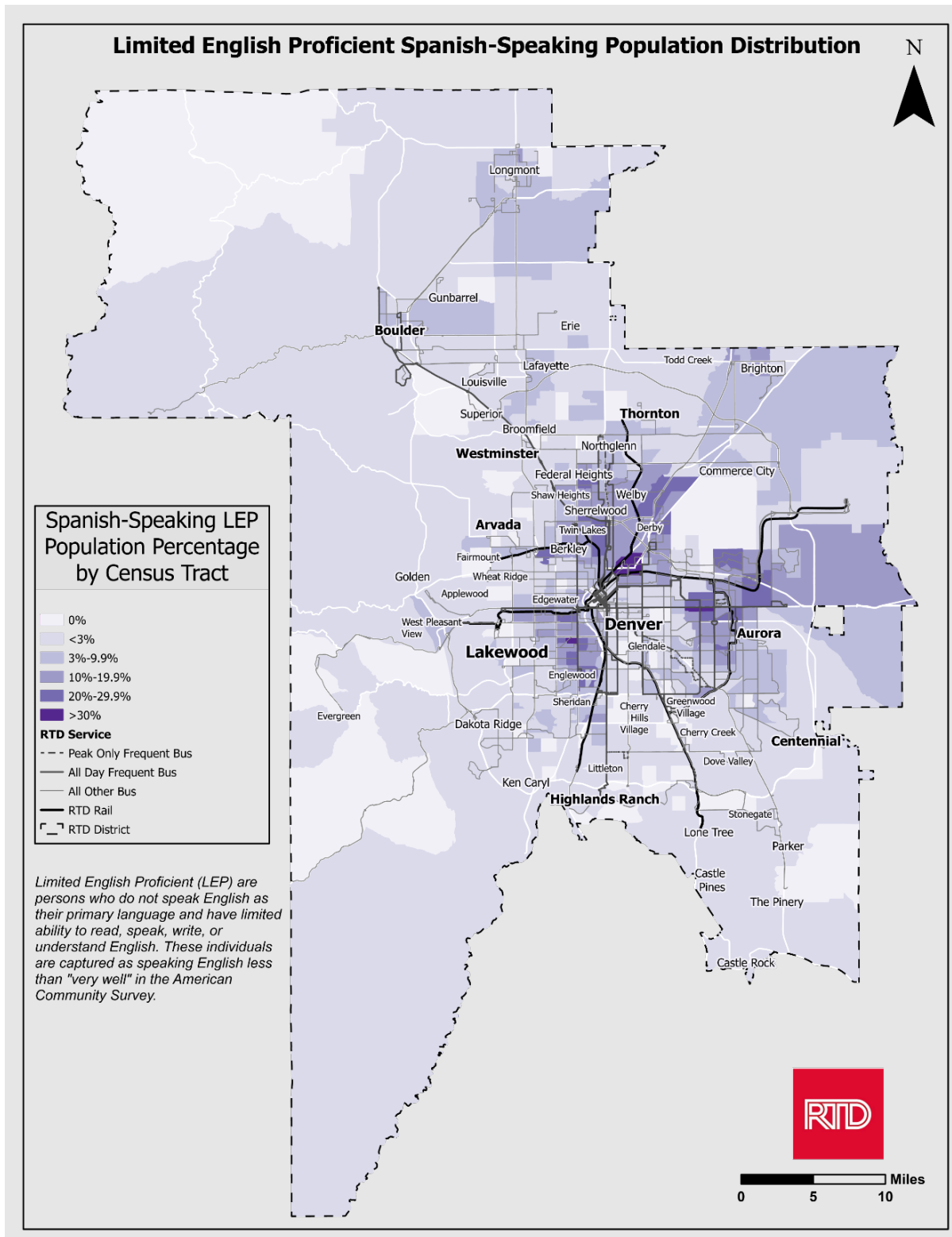


Figure 6. ACS Distribution of Spanish Speakers (Age 5+) Who Are Limited English Proficient



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Figure 7. ACS Distribution of Vietnamese Speakers (Age 5+) Who Are Limited English Proficient

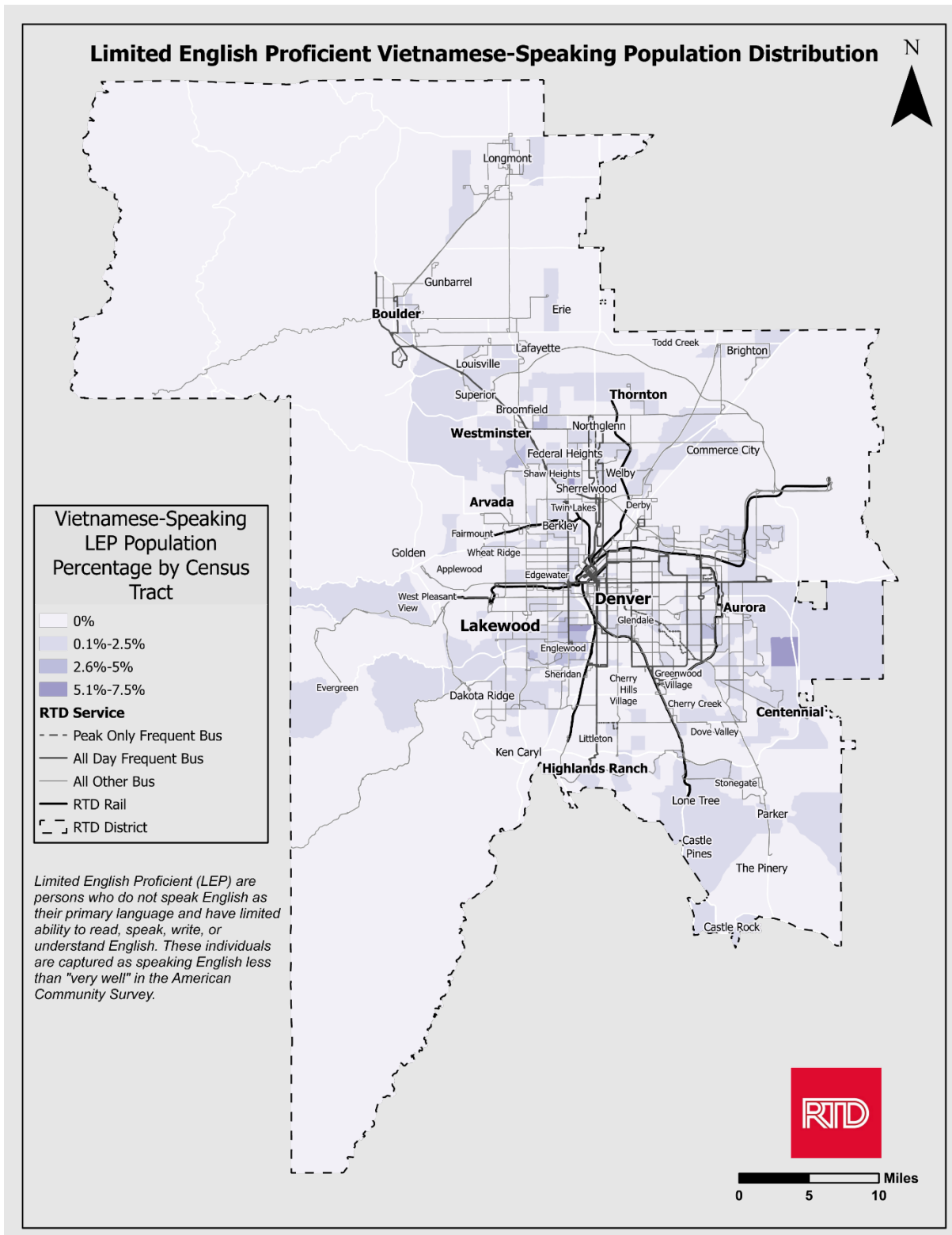
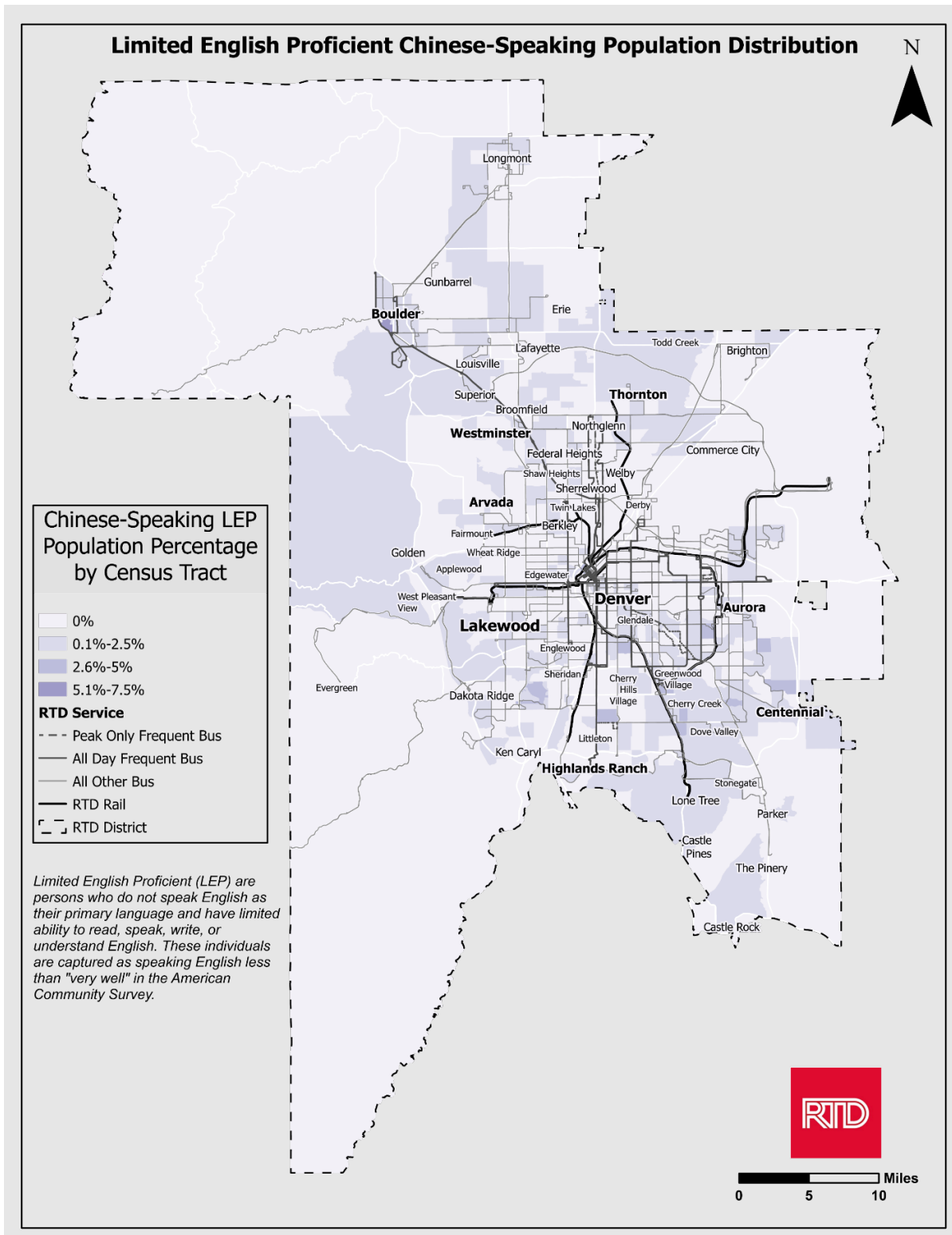


Figure 8. ACS Distribution of Chinese Speakers (Age 5+) Who Are Limited English Proficient



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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

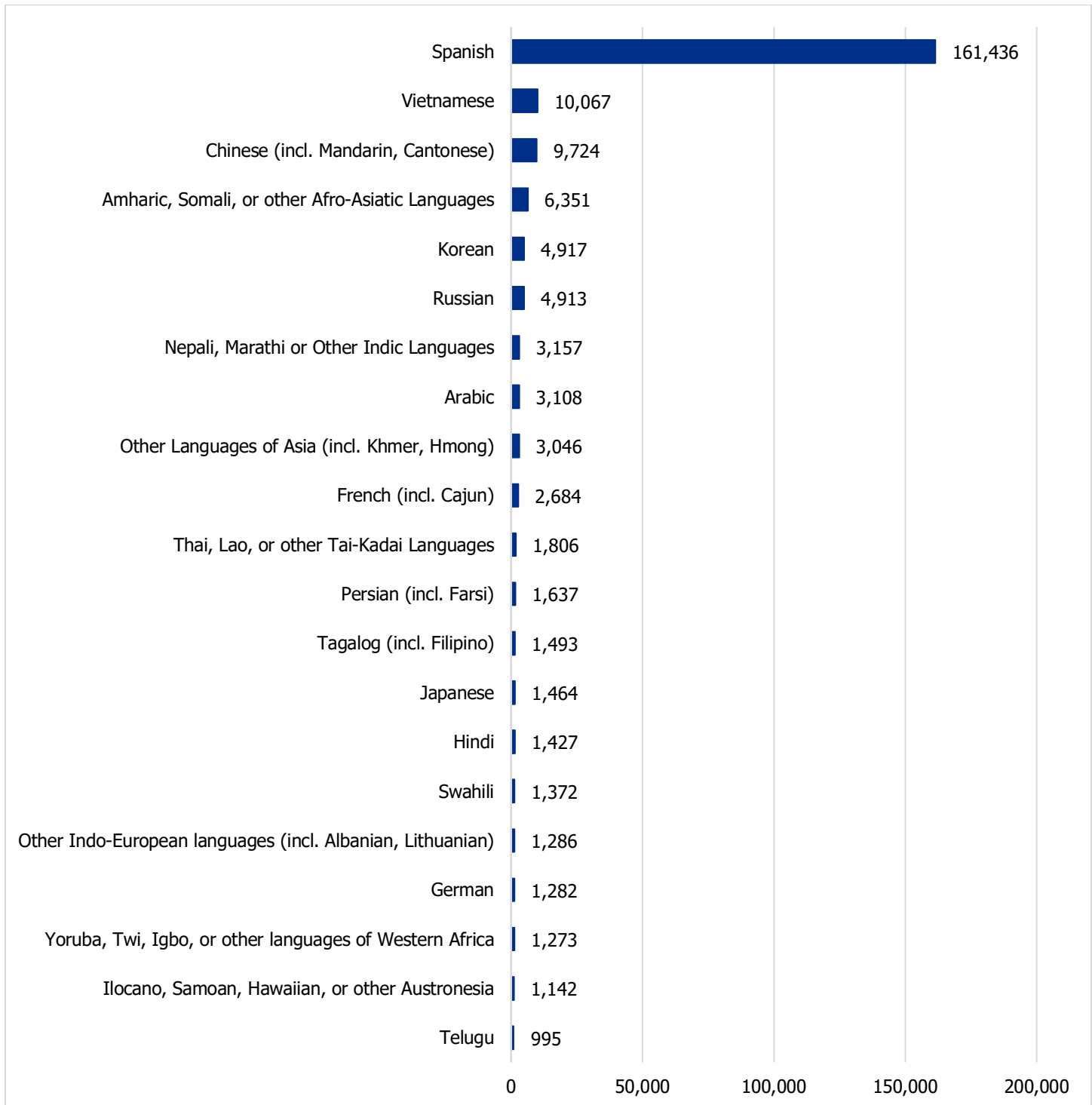
Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	161,436	4.7%	68.9%
Vietnamese	10,067	0.3%	4.3%
Chinese (incl. Mandarin, Cantonese)	9,724	0.3%	4.1%
Amharic, Somali, or other Afro-Asiatic languages	6,351	0.2%	2.7%
Korean	4,917	0.1%	2.1%
Russian	4,913	0.1%	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



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

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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

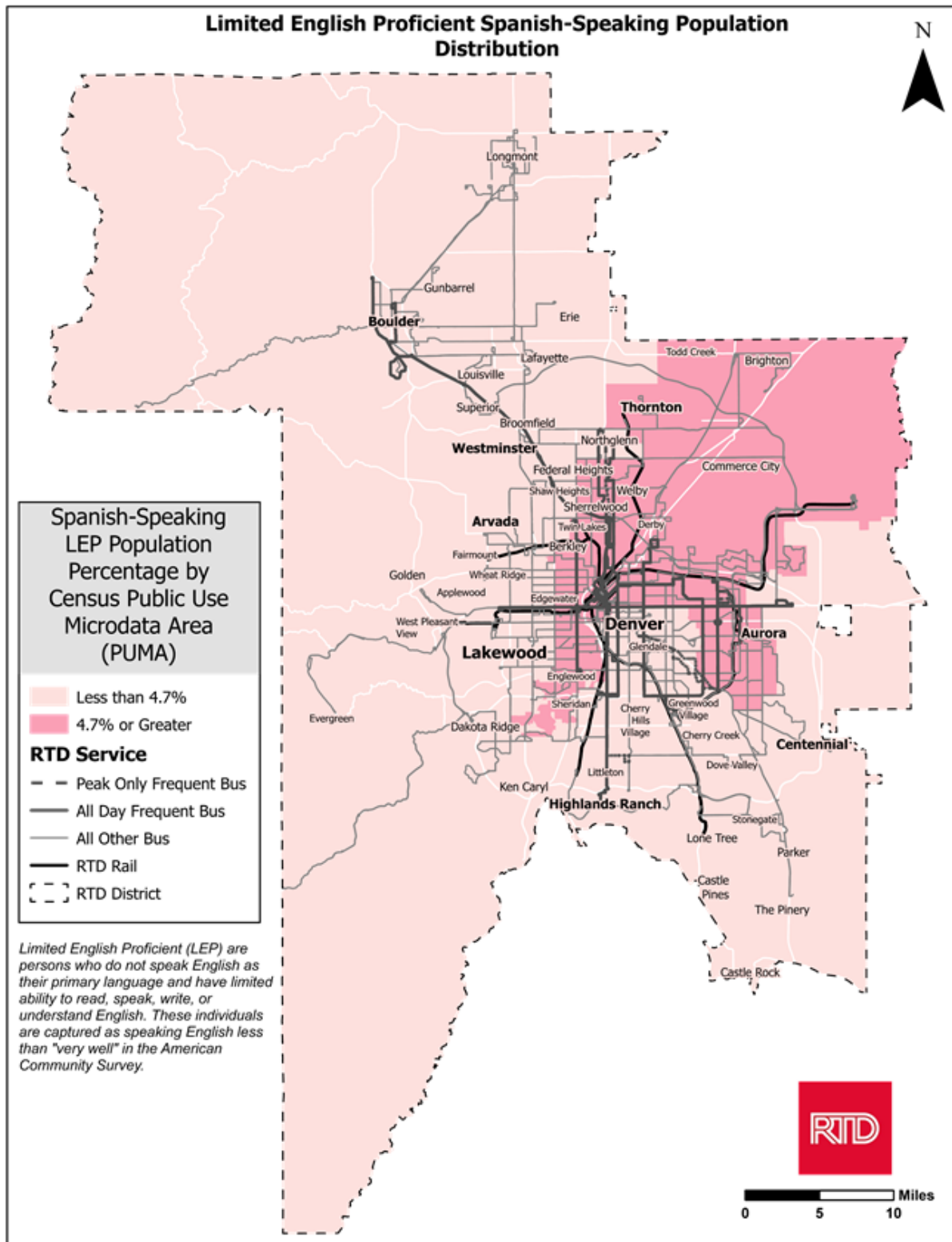
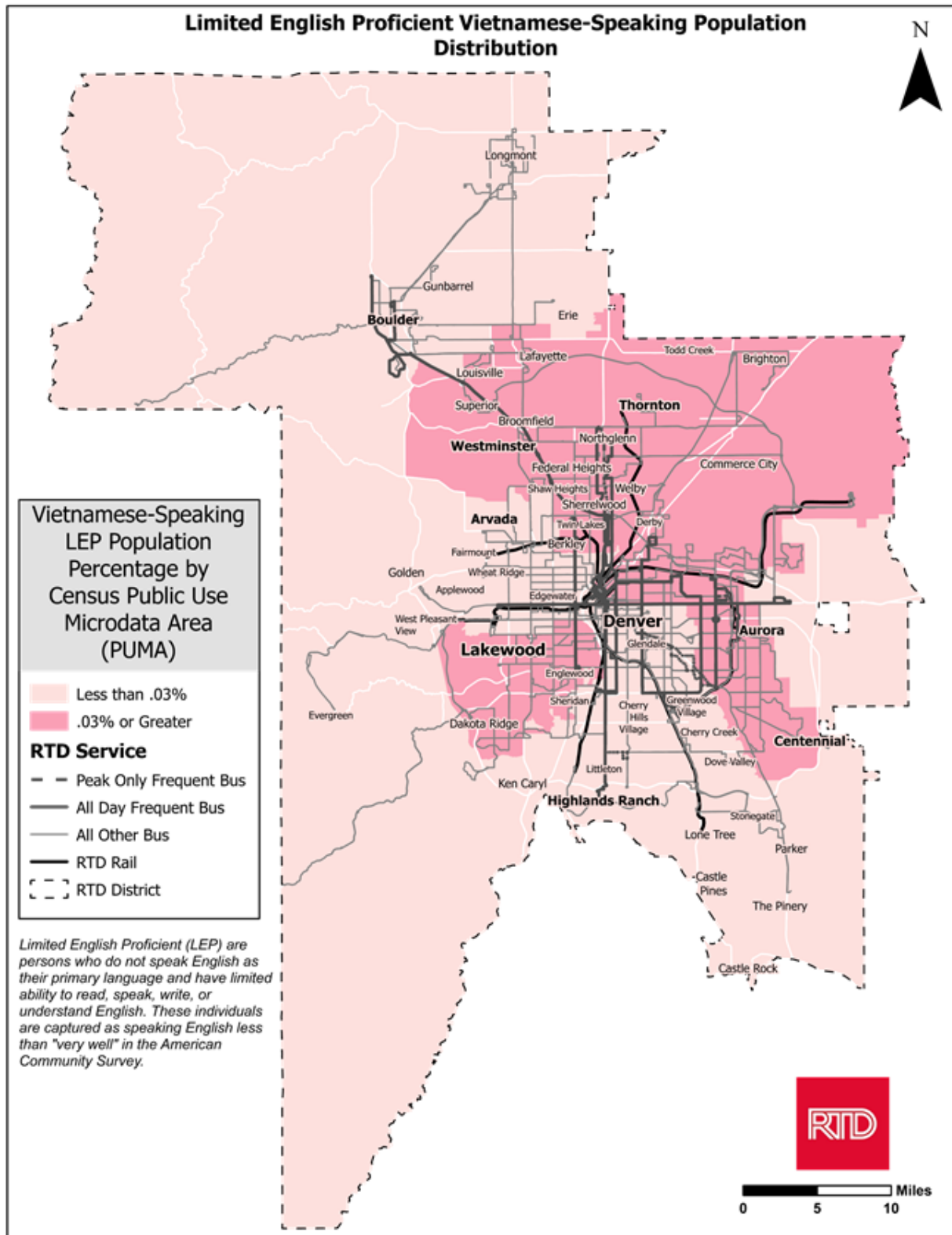
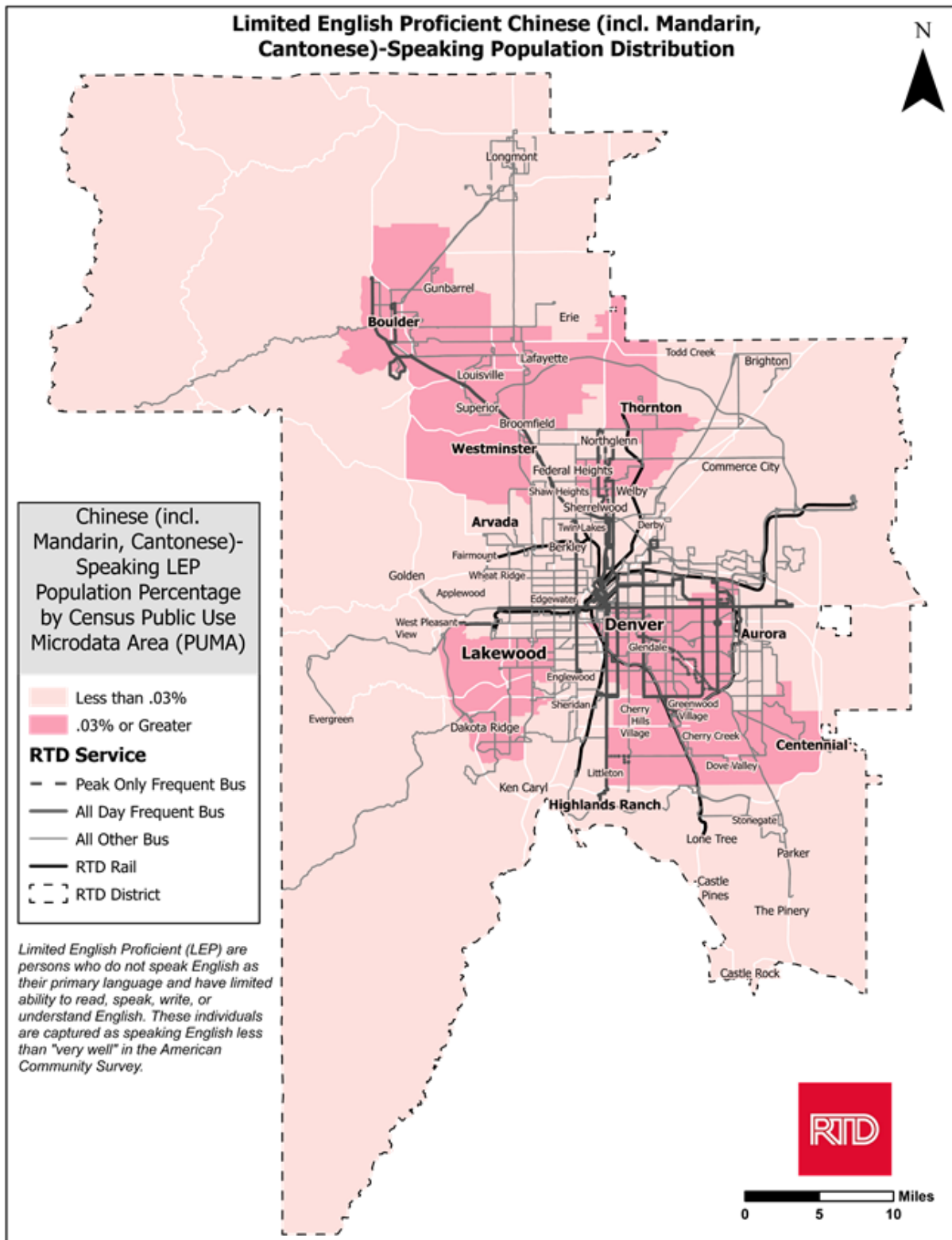


Figure 12. PUMS Distribution of Vietnamese Speakers (Age 5+) Who Are Limited English Proficient



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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.

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.

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.

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Figure 16. Spoken Languages of WIC Clients within the RTD Service Area For 2019¹¹

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.

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

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 Chinese (Simplified)	Amharic 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.

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

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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

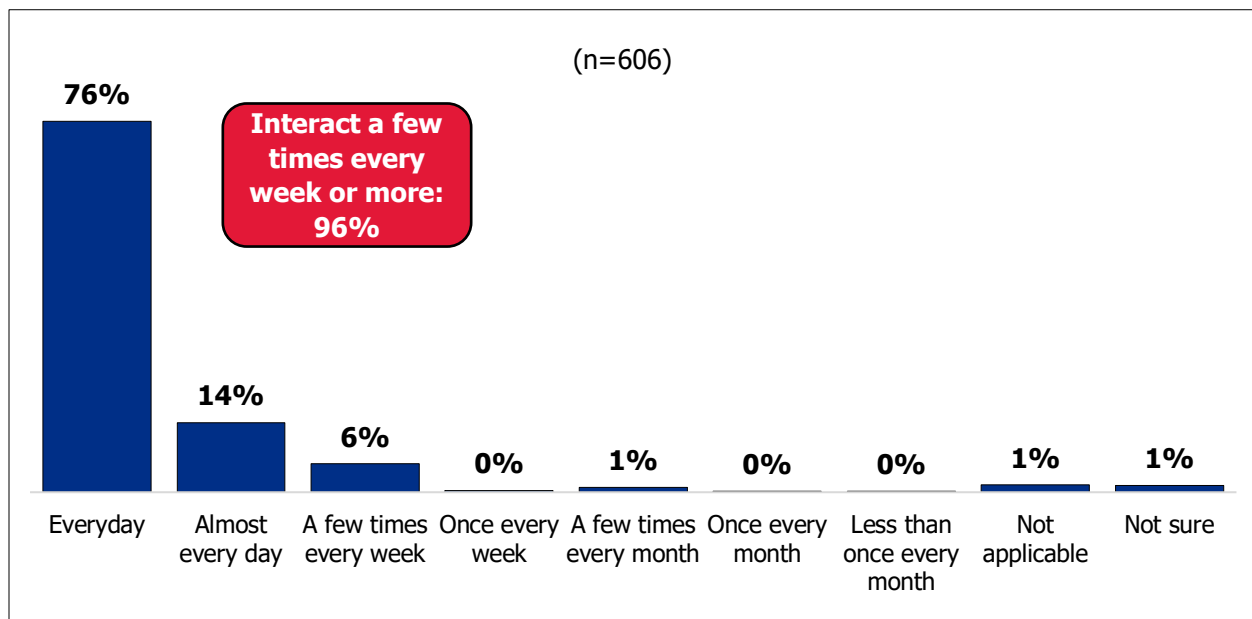
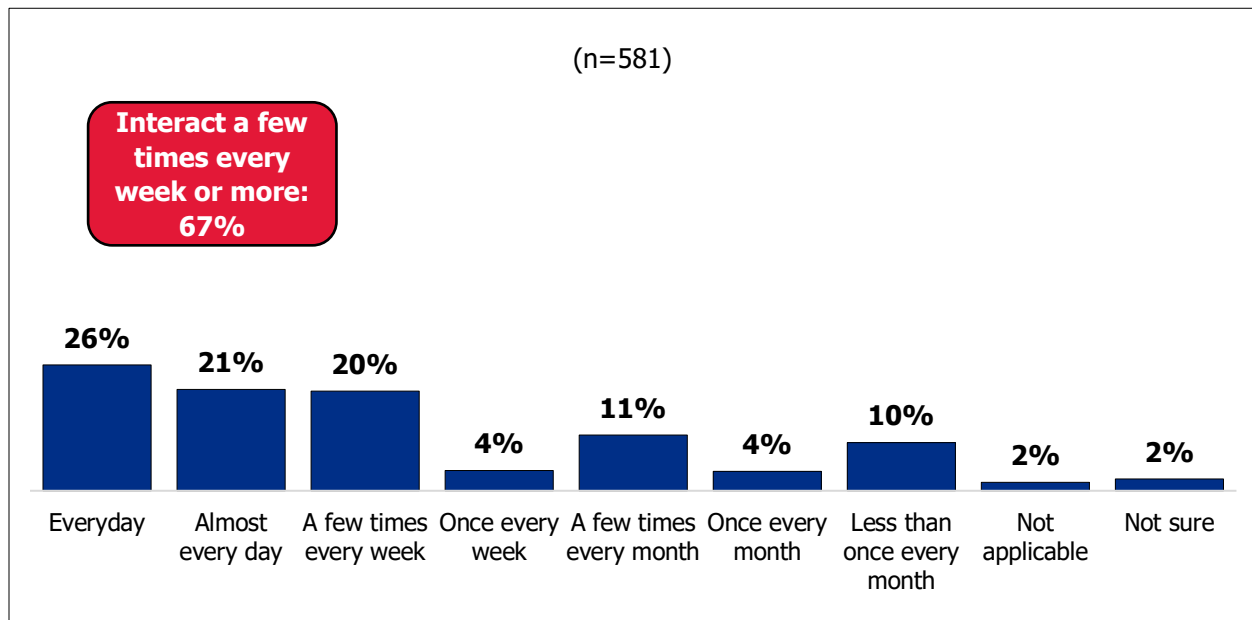


Figure 19. Frequency Interacting with LEP Customers



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

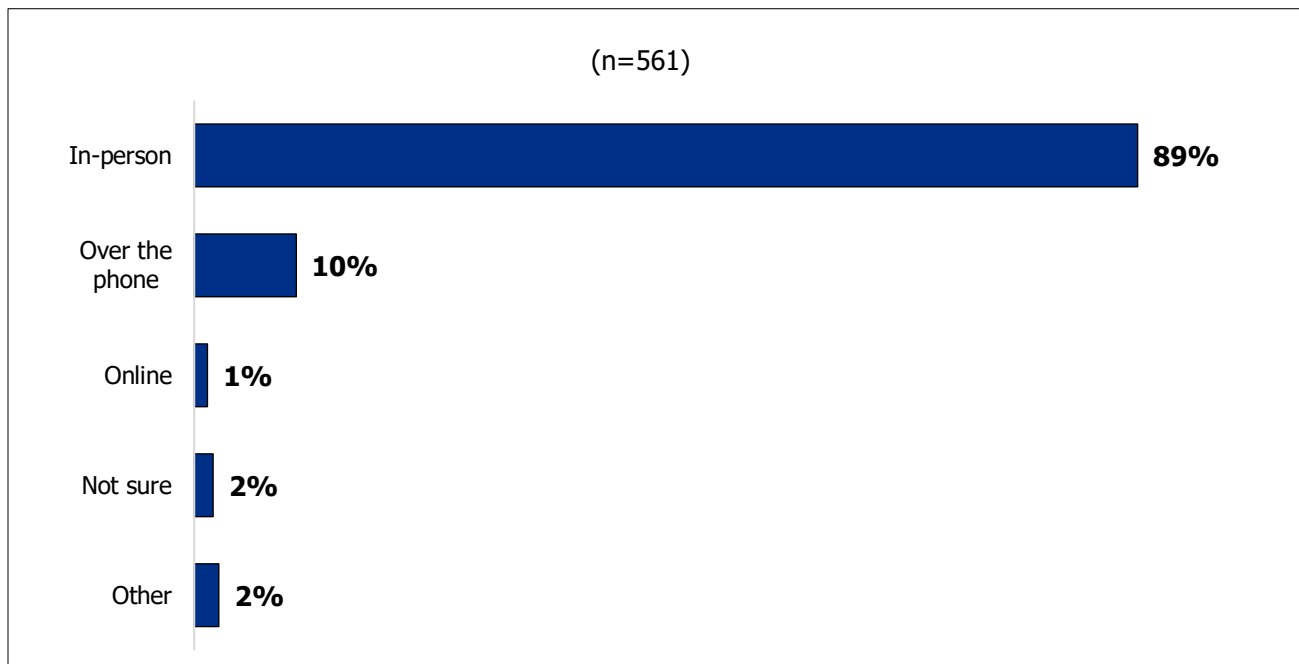
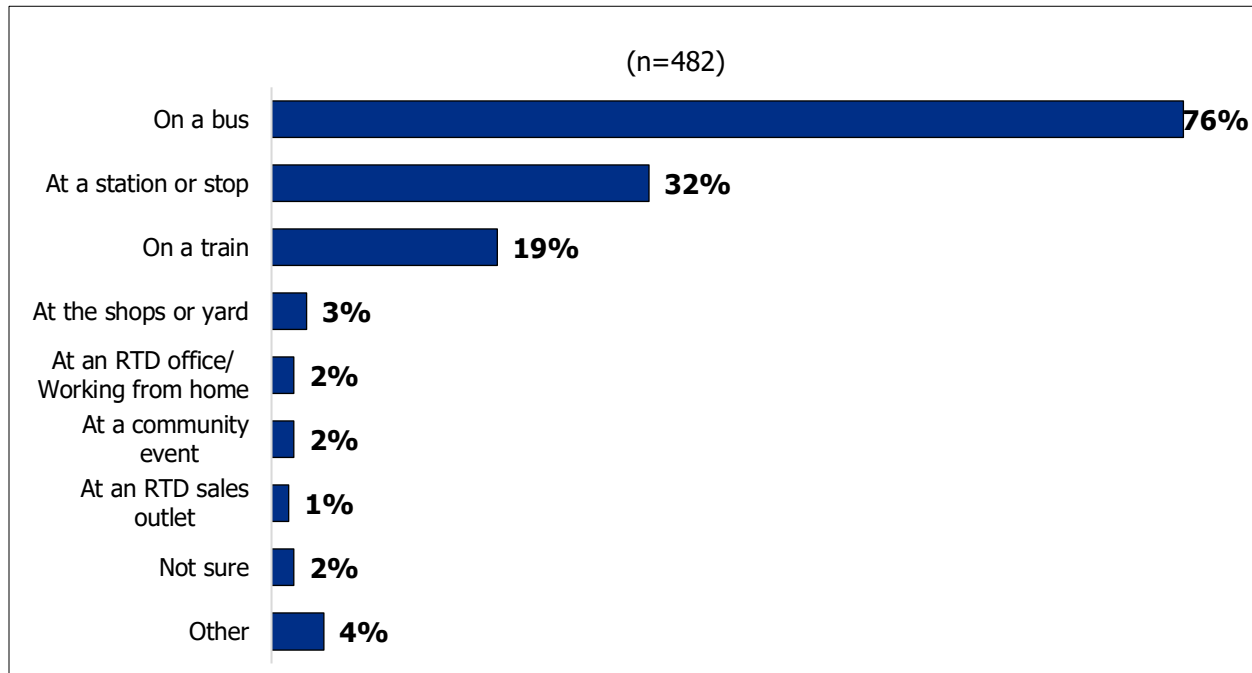
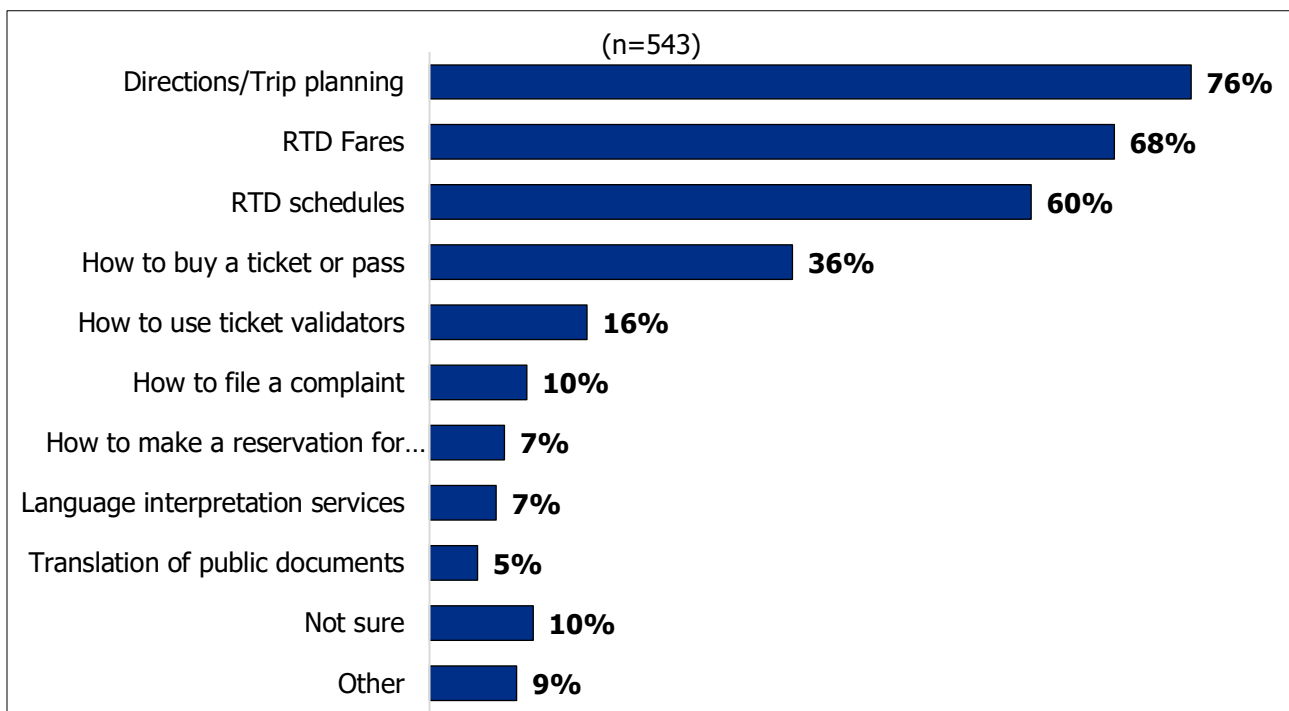


Figure 21. Where Employees Typically Interact with LEP Customers



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



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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

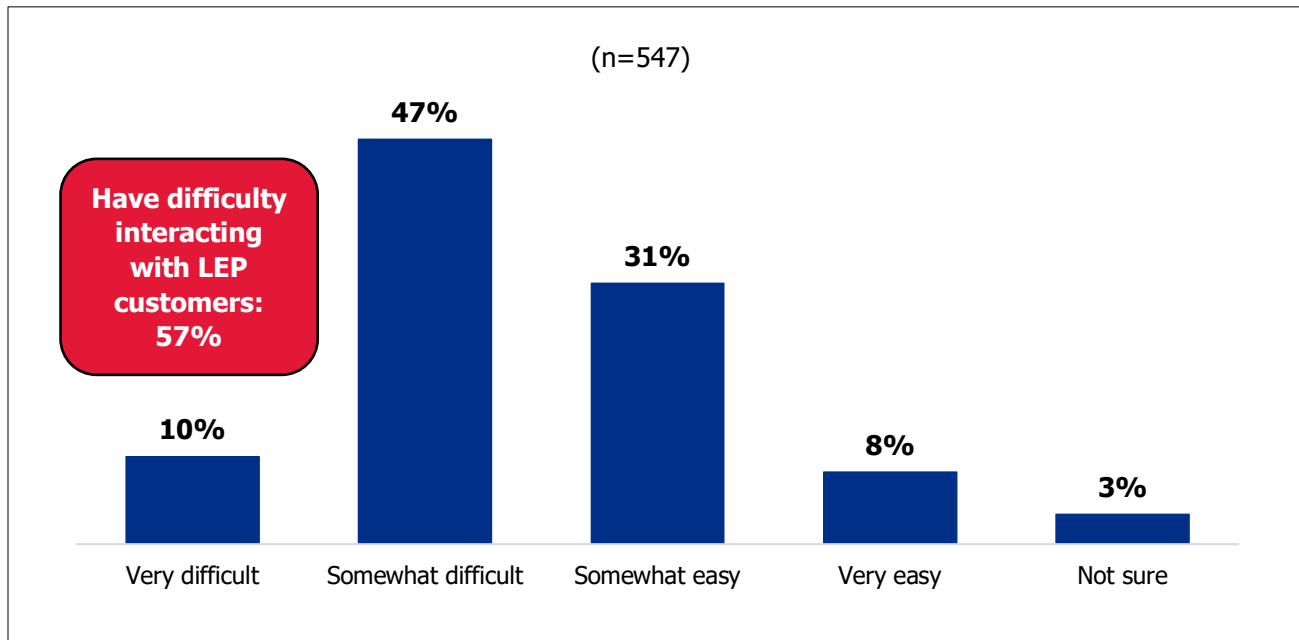


Figure 24. Feel Equipped to Communicate with LEP Customers

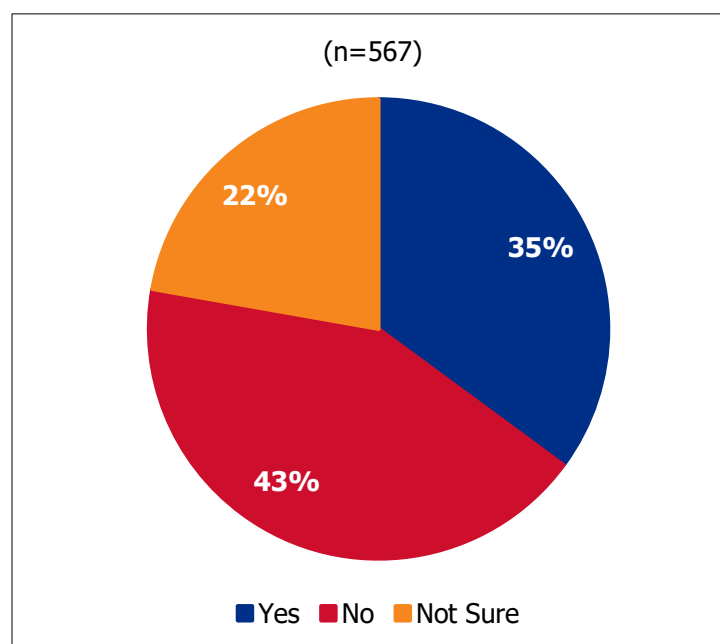
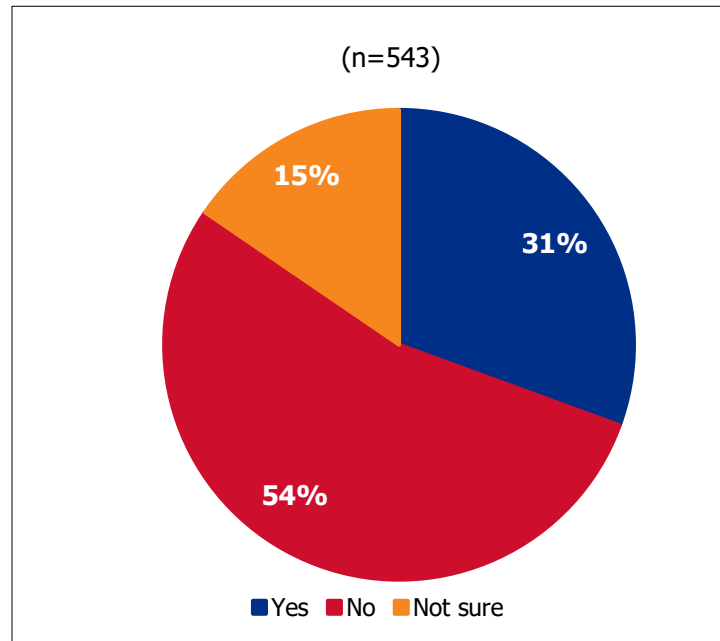


Figure 25. Aware of RTD LEP Materials, Services, Tools



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

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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 current 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

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.

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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.

Figure 29. Frequency of Riding RTD

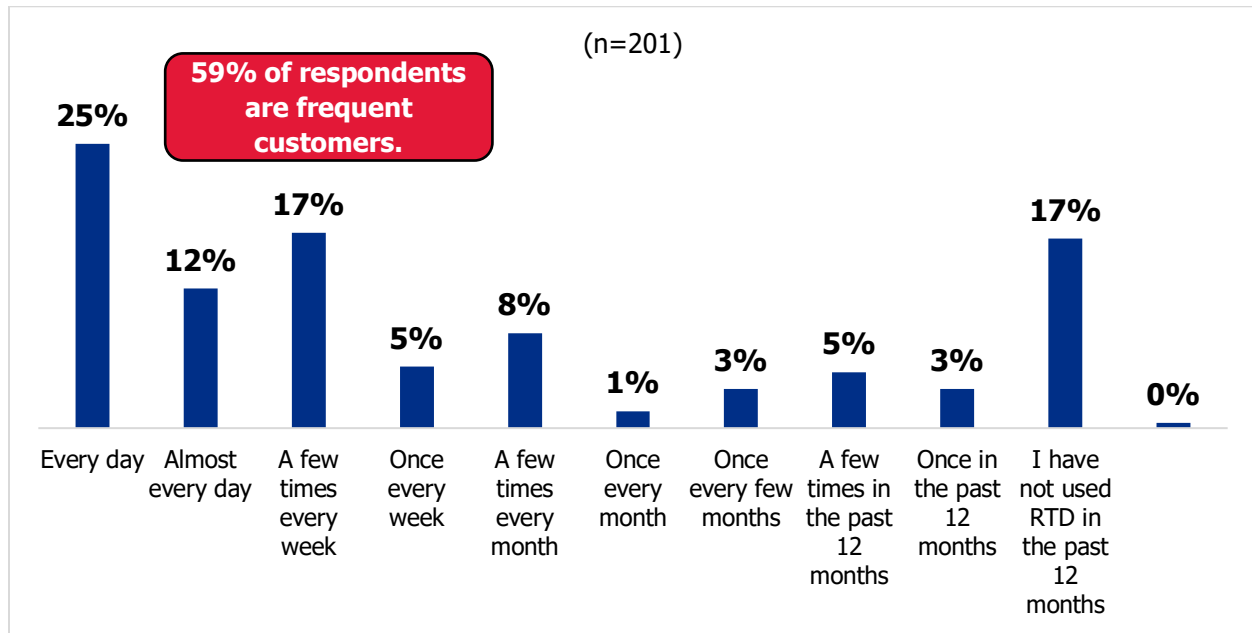
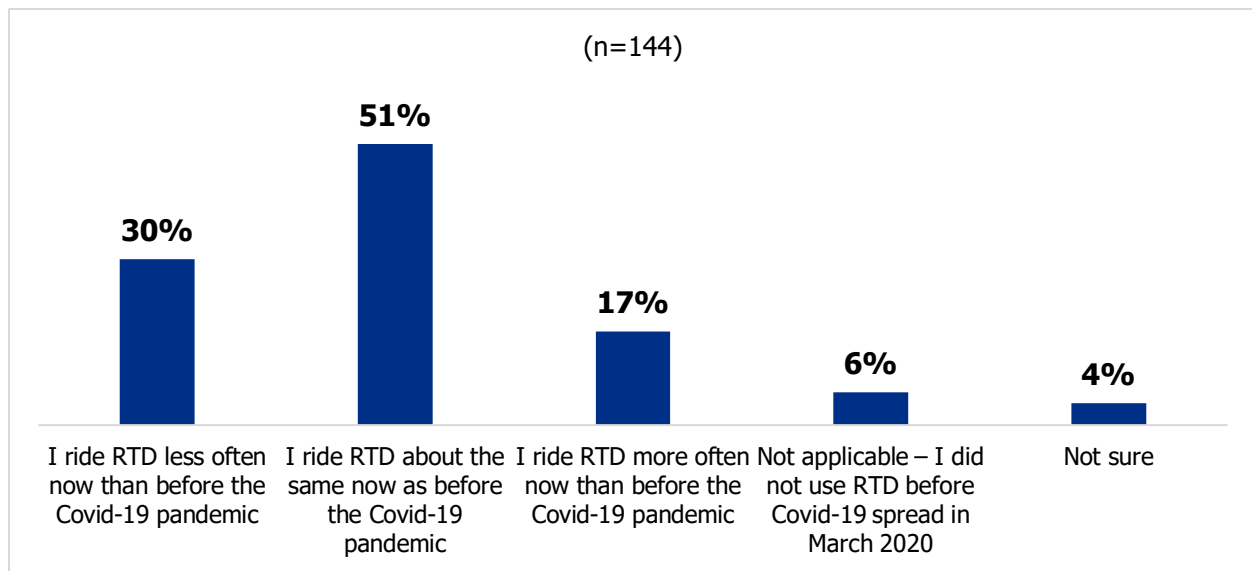
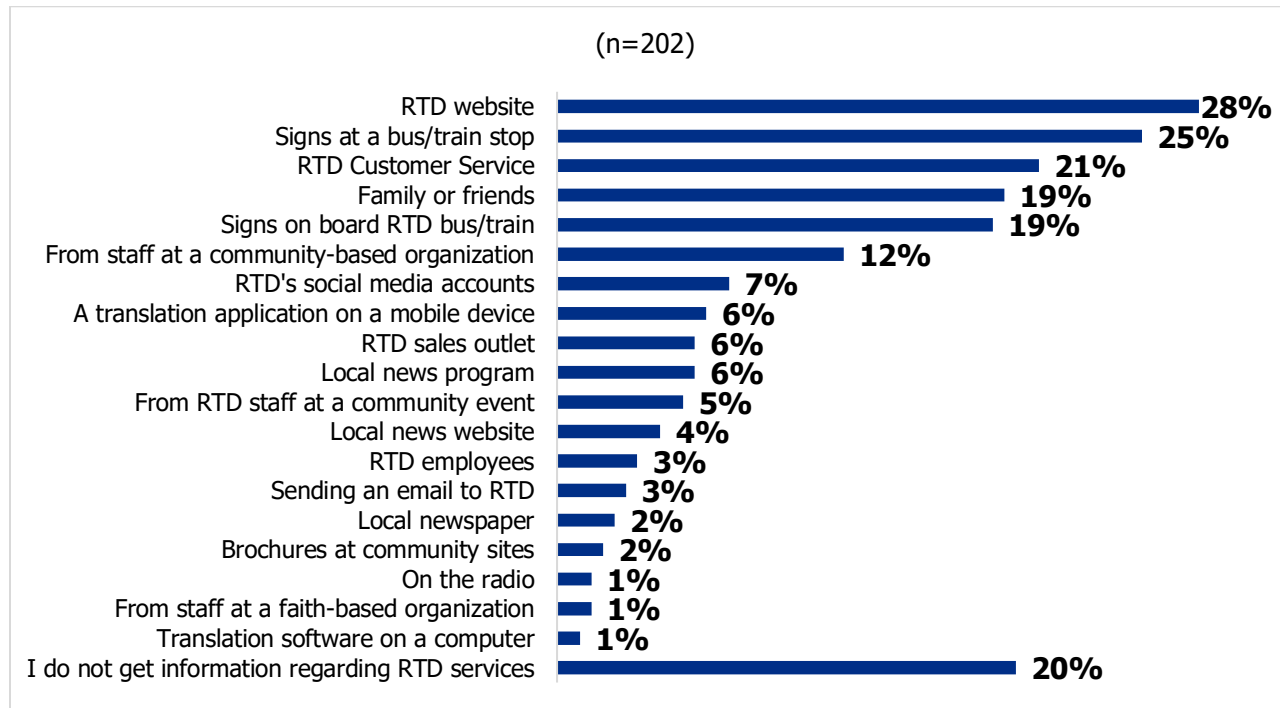


Figure 30. Change in Ridership Due to COVID-19



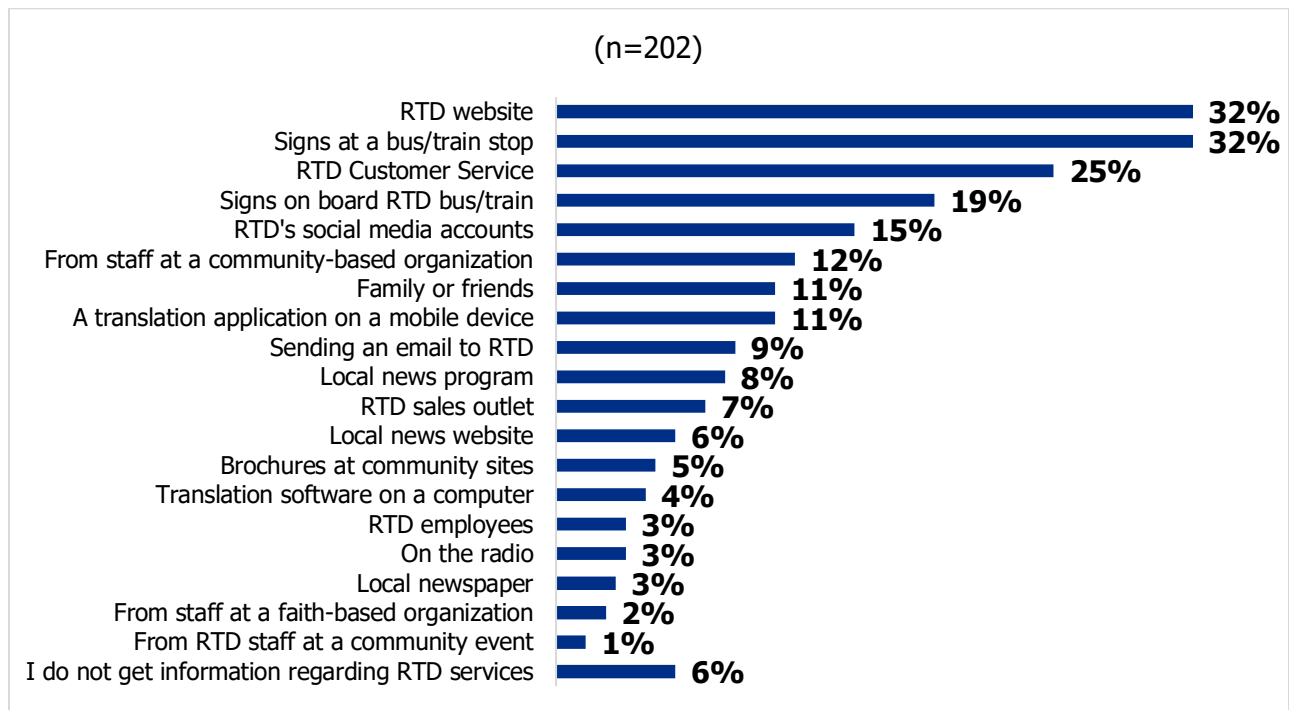
Customers with limited English proficiency receive information about RTD in numerous ways. The top five cited information sources were the RTD website (28%), signs at transit stops (25%), RTD customer service (21%), family or friends (19%), and from signs on buses or trains (19%).

Figure 31. How LEP Customers Get Information about RTD



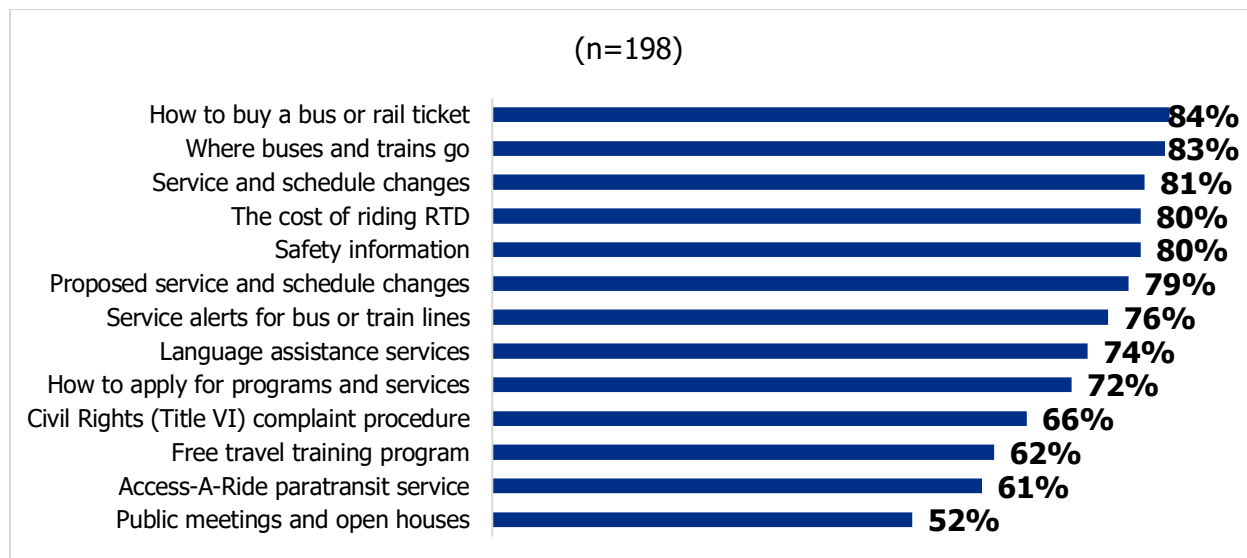
When asked how they *prefer* to receive information about RTD, LEP persons' preferences slightly differed with the RTD website (32%), signs at transit stops (32%), RTD customer service (25%), signs on board RTD buses or trains (19%), and RTD social media accounts (15%) being their ideal methods of receiving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

Figure 32. Preferred Method of Receiving Information about RTD



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



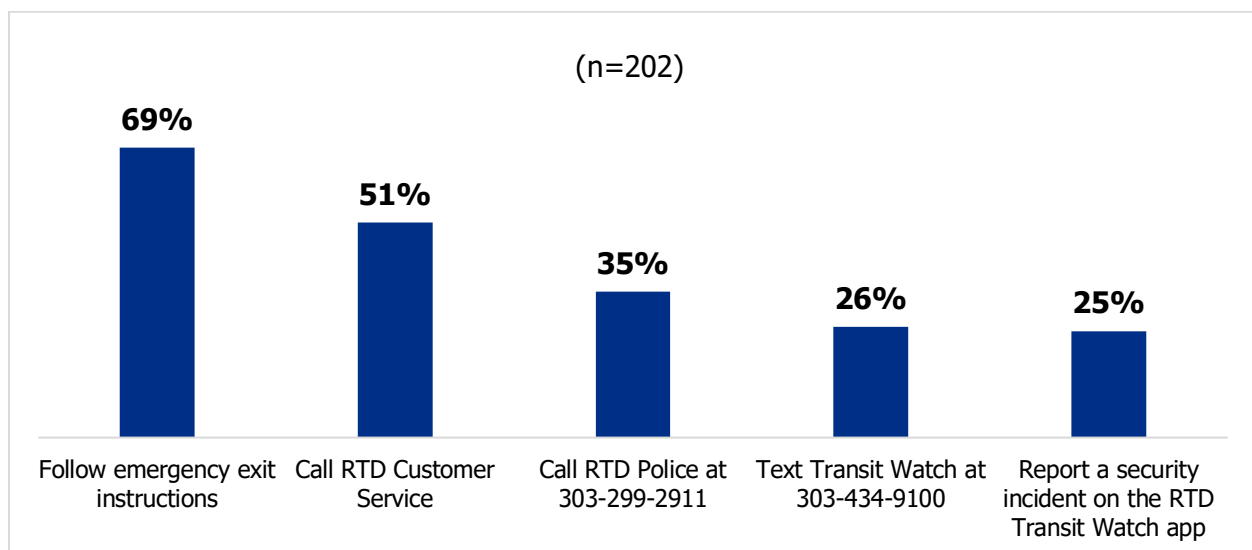
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It is important to note that customers with LEP differed on the usefulness of RTD’s current language translation services. Respondents were asked to rate how useful RTD’s language assistance services are on a scale of 1 to 5, with 5 being “very useful.” 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.

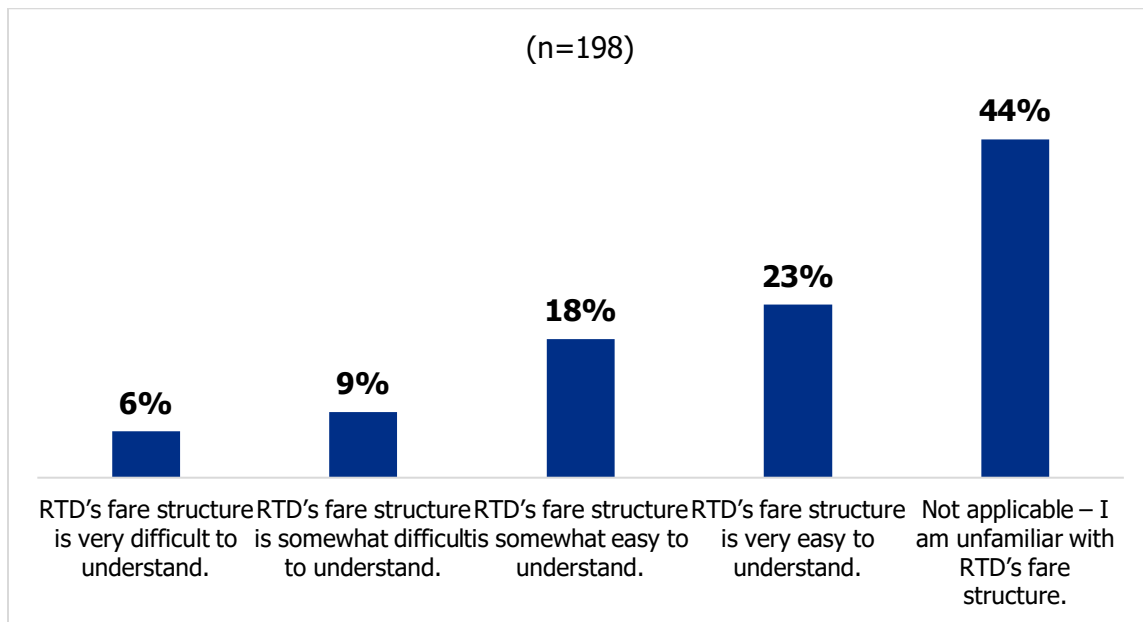
Further, access to information has implications for feelings of security. Two in three respondents have felt their security was at risk while using RTD services at some point, but not everyone reported knowing what to do in case of an emergency. Most respondents (69%) know how to follow emergency exit 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



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 importance 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

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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

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- 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

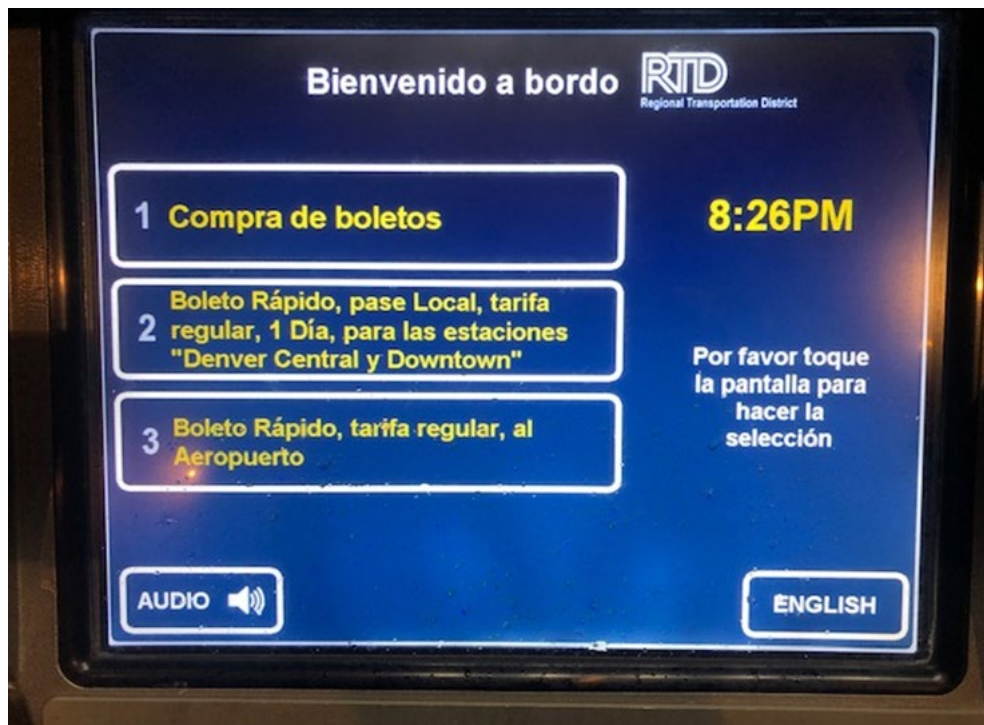


Figure 38. RTD's Title VI Public Notice

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 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 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.

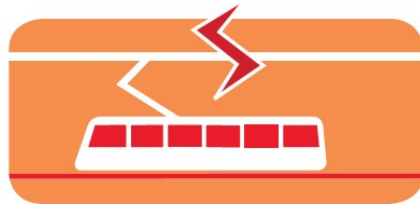
RTD Tôn Trọng Các Quyền Dân Sự

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.



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

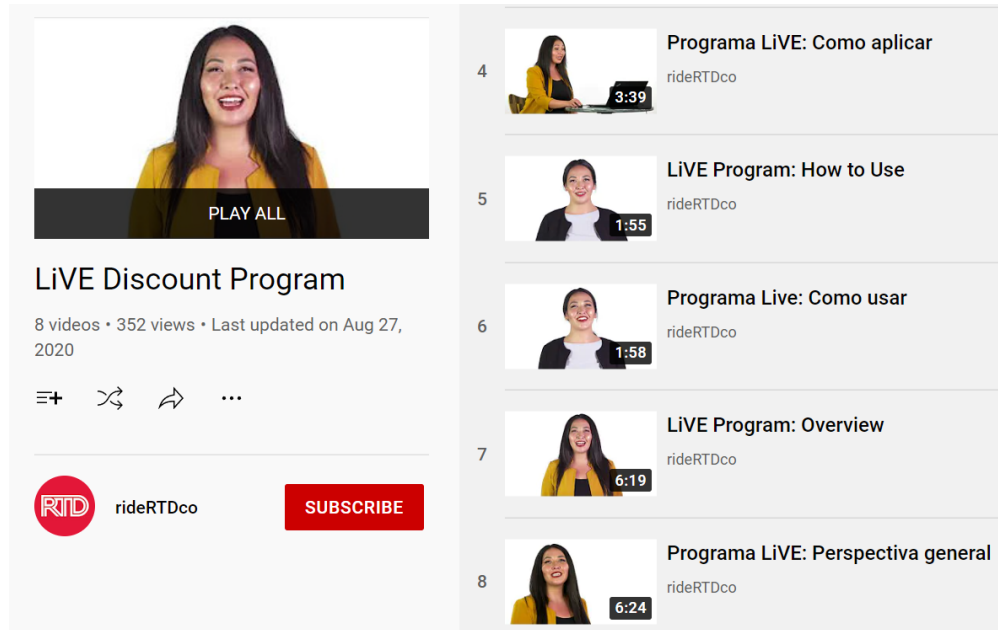


Figure 41. RTD's Spanish-Language Brochure for the LiVE Discount Program

Cómo viajar con

UNA TARIFA DE DESCUENTO

RTD ofrece tarifas de descuento a nuestra comunidad de adultos mayores, personas con discapacidades, beneficiarios de Medicare y pasajeros jóvenes. También ofrecemos un descuento basado en los ingresos por medio de nuestro programa LiVE, a las personas que califiquen.

rtd-denver.com

Si va a viajar en autobús o tren con un pase o boleto de descuento, debe mostrar uno de los siguientes documentos como comprobante de elegibilidad:

JÓVENES

Los jóvenes de 6 a 19 años reciben 70 por ciento de descuento en la tarifa si muestran:

- Identificación de la escuela secundaria o preparatoria,
- Una identificación con fotografía emitida por el gobierno que indique la edad del pasajero, o
- Tarjeta de Descuento Especial para jóvenes emitida por RTD

Hasta tres niños 5 años o menos viajan gratis con un adulto que haya pagado su boleto.

ADULTO DE 65 AÑOS O MÁS

Los adultos de 65 años o más reciben 50 por ciento de descuento en la tarifa si muestran:

- Una identificación con fotografía emitida por el gobierno que indique la edad del pasajero,
- Tarjeta de Medicare, o
- Tarjeta de Descuento Especial emitida por RTD

PERSONAS CON DISCAPACIDADES

Los pasajeros reciben 50 por ciento de descuento en la tarifa si muestran:

- Tarjeta de Medicare o
- Tarjeta de Descuento Especial emitida por RTD

LiVE

Las personas inscritas en LiVE, el programa de RTD de tarifas de descuento basado en los ingresos, reciben un descuento de 40 por ciento y deben mostrar una tarjeta de identificación de LiVE cuando utilicen uno de los medios de tarifas:

- Tarjeta LiVE MyRide,
- Boleto móvil LiVE (pase de 3 horas o pase de un día), o
- Boleto LiVE emitido por una agencia gubernamental o sin fines de lucro

Para calificar para LiVE, debe tener entre 20 y 64 años, vivir dentro del área de servicio de RTD y tener un ingreso familiar igual o inferior al 185 por ciento del Nivel de Pobreza federal.

Para obtener más información sobre este programa o para solicitarlo, visite rtd-denver.com/LiVE

CÓMO SOLICITAR UNA TARJETA DE DESCUENTO ESPECIAL

Para obtener más información sobre los requisitos de elegibilidad y cómo solicitar una tarjeta de descuento especial de RTD, visite rtd-denver.com/fares-passes/discount-fares

Correo Electrónico
specialdiscount@rtd-denver.com

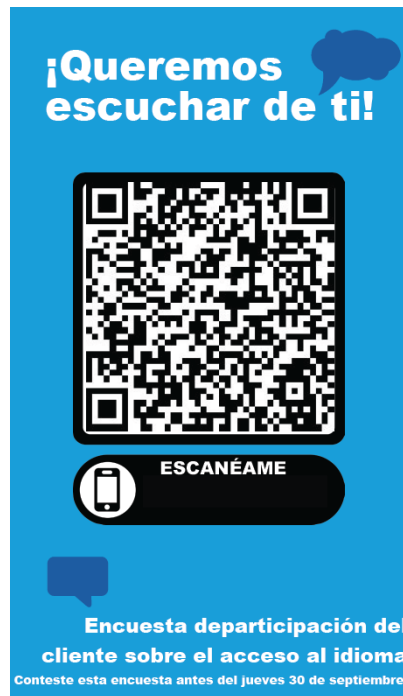
Correo Postal
 RTD Special Discount Office
 1660 Blake Street, BLK – 12
 Denver, CO 80202

En Persona
 (en la dirección arriba indicada)
 Lunes a jueves
 9–mediodía y 1-4 p.m.
 Viernes
 9–mediodía y 1-3 p.m.

INFORMACIÓN IMPORTANTE SOBRE LAS TARIFAS DE DESCUENTO DE RTD:

- Sólo se puede usar un tipo de descuento. Los descuentos no pueden combinarse.
- Los descuentos no aplican a las tarifas de Access-a-Ride. El servicio Access-a-Ride tiene una solicitud y proceso de calificación por separado.

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

- Fare changes
- Emergency transportation information

RTD has consistently worked with community organizations and the LEP populations they 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

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- 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

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#	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

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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

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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.	<ul style="list-style-type: none"> • Safety and Security information • Rights Notices • Information about Public Hearings and Comment Opportunities related to: <ul style="list-style-type: none"> ○ 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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

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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

2022 Language Access Plan



- 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			

2022 Language Access Plan



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	

2022 Language Access Plan



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

2022 Four Factor Analysis full report

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**



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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%

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

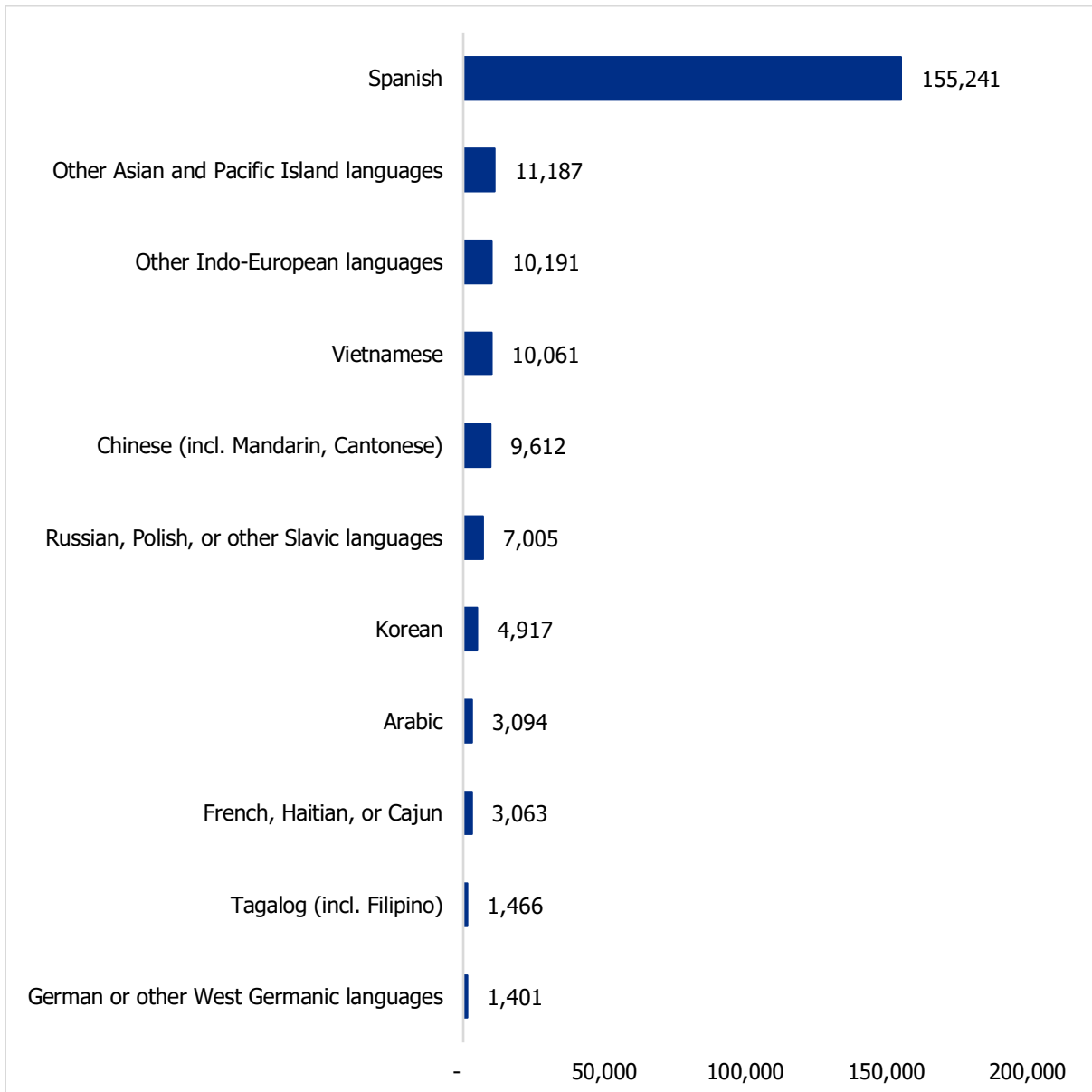
² RTD estimated district boundaries using the American Community Survey (ACS) 5-Year Estimates at the Census Tract level. RTD analyzed all Census Tracts required to include all 8 counties RTD has services in: Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson and Weld Counties.

Four Factor Analysis: Factor 1

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 2. Languages with LEP Populations ≥ 1,000



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

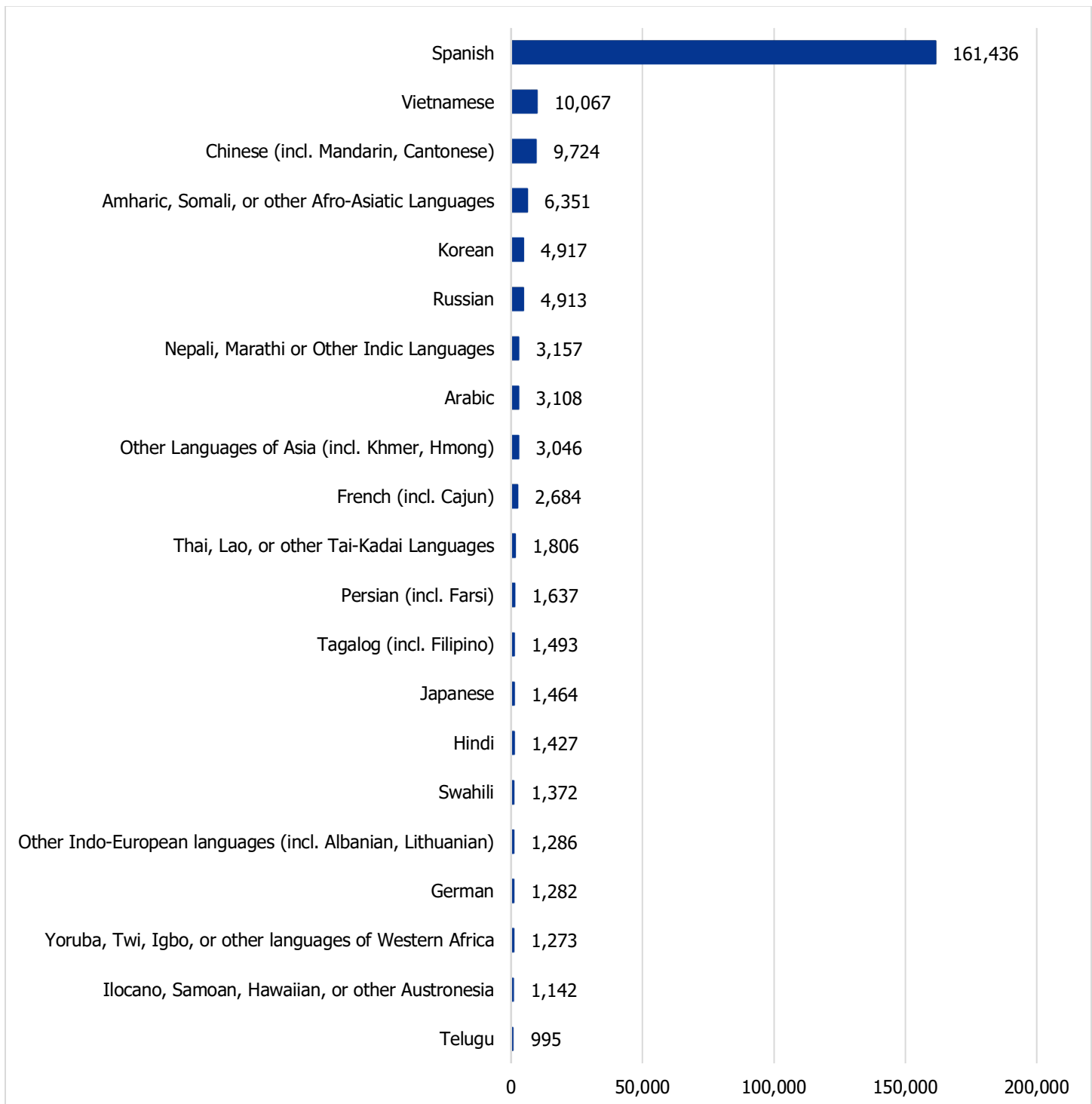
Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	161,436	4.8%	68.9%
Vietnamese	10,067	0.3%	4.3%
Chinese (incl. Mandarin, Cantonese)	9,724	0.3%	4.1%
Amharic, Somali, or other Afro-Asiatic languages	6,351	0.2%	2.7%
Korean	4,917	0.1%	2.1%
Russian	4,913	0.1%	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)

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



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

Four Factor Analysis: Factor 1

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

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.

Four Factor Analysis: Factor 1

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 2019⁷

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)

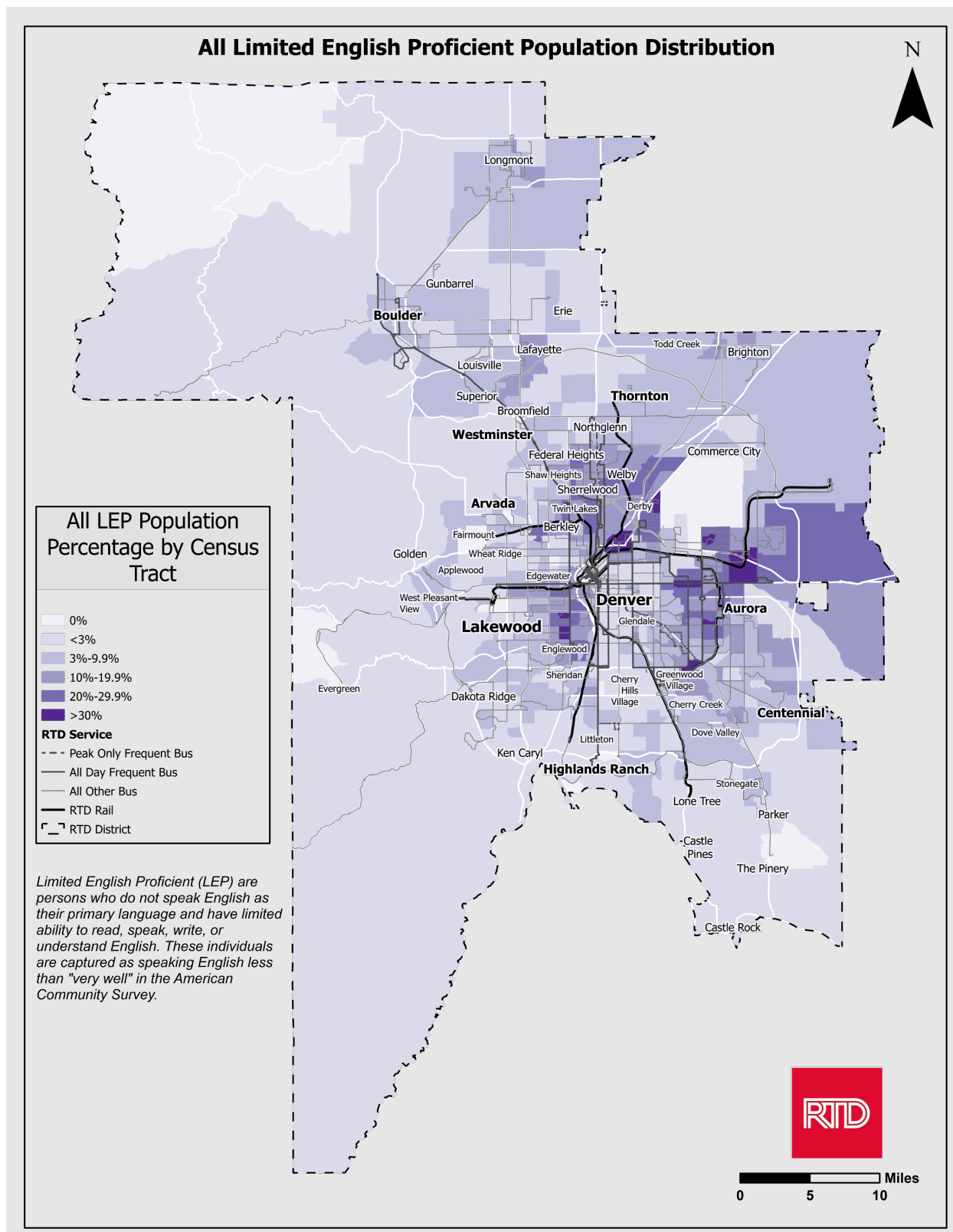
⁷ Colorado Department of Public Health and Environment does not disclose the exact number of clients where a language spoken at home is less than 50 per county in order to protect privacy.

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

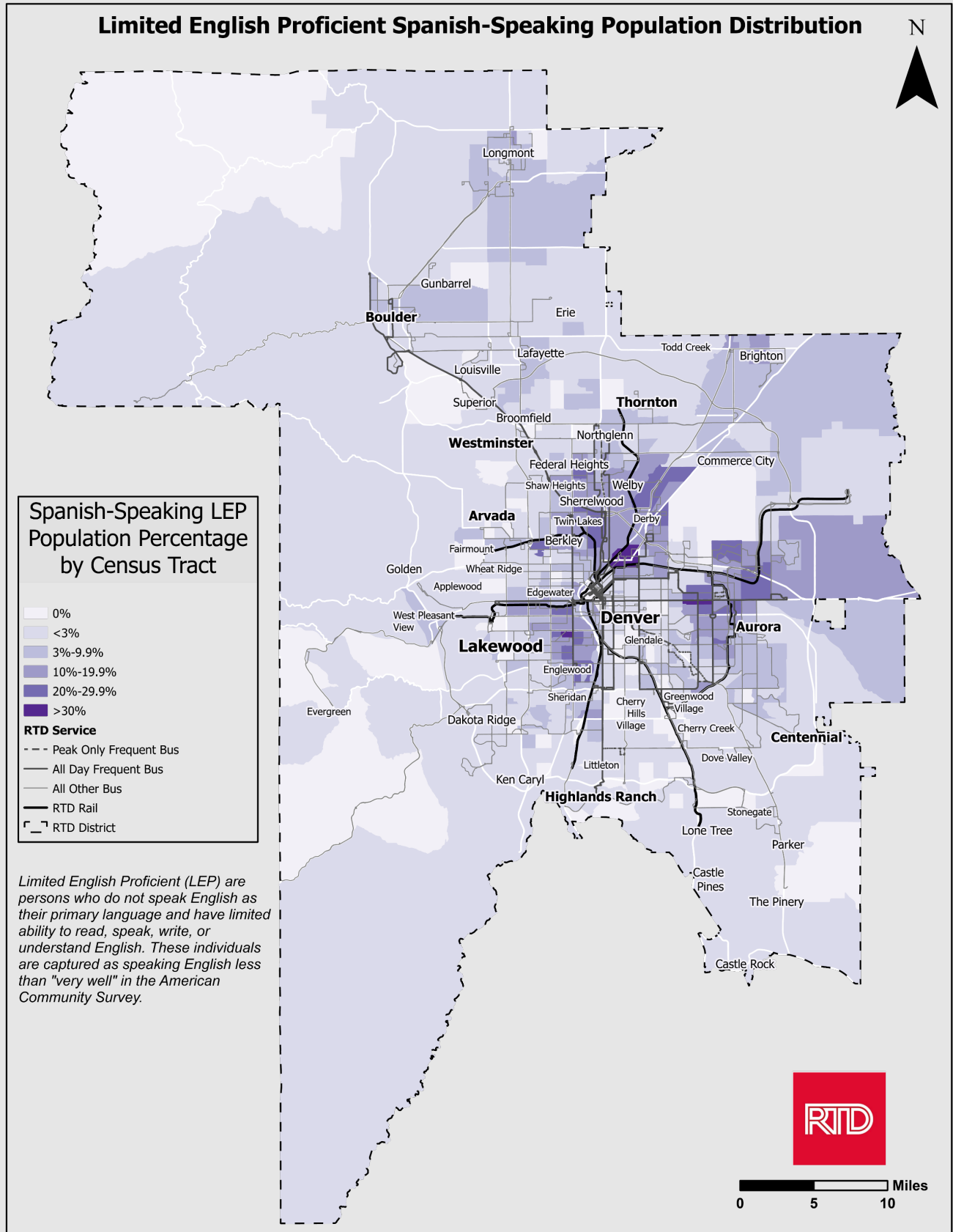
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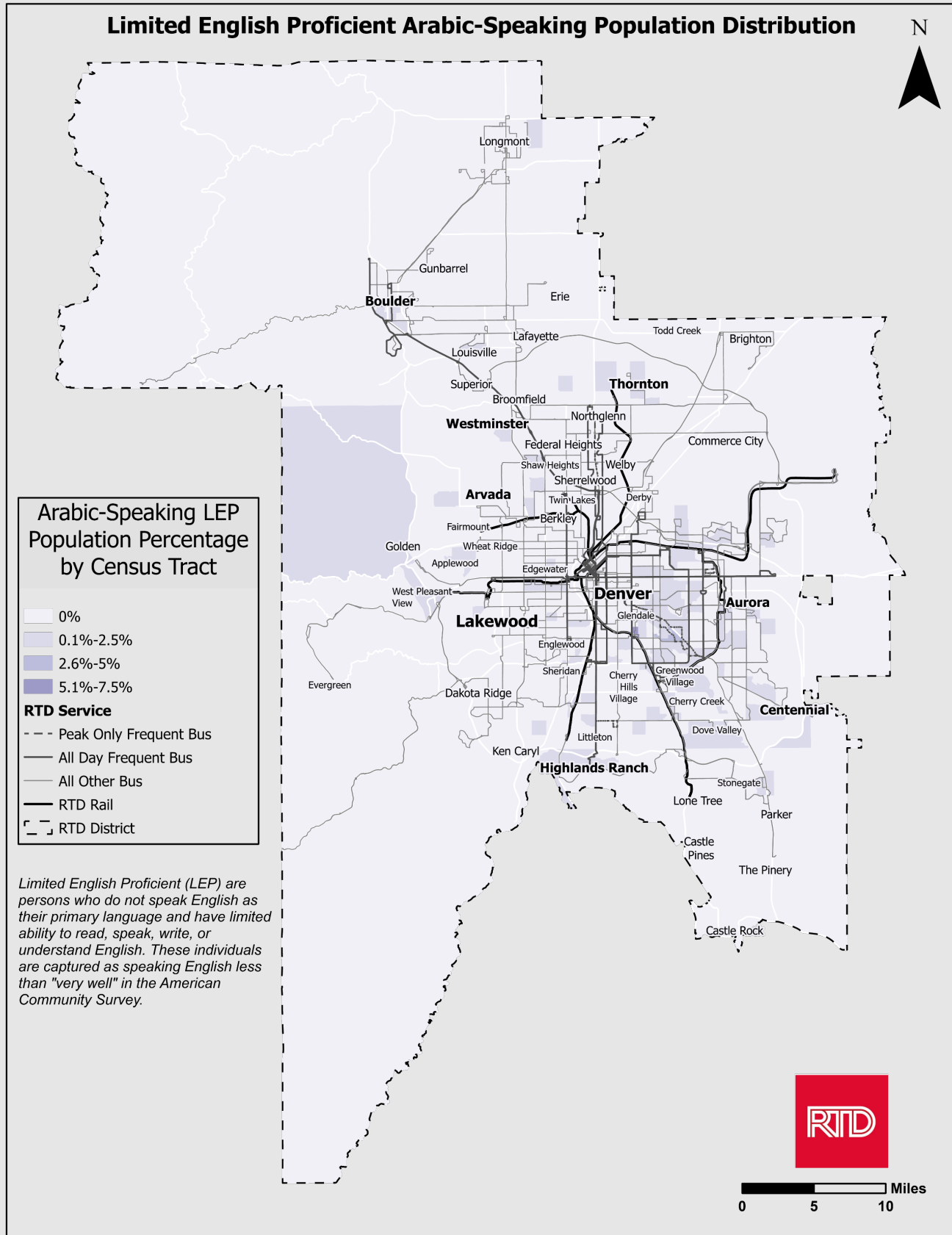
Appendix A: LEP Census Tract Maps



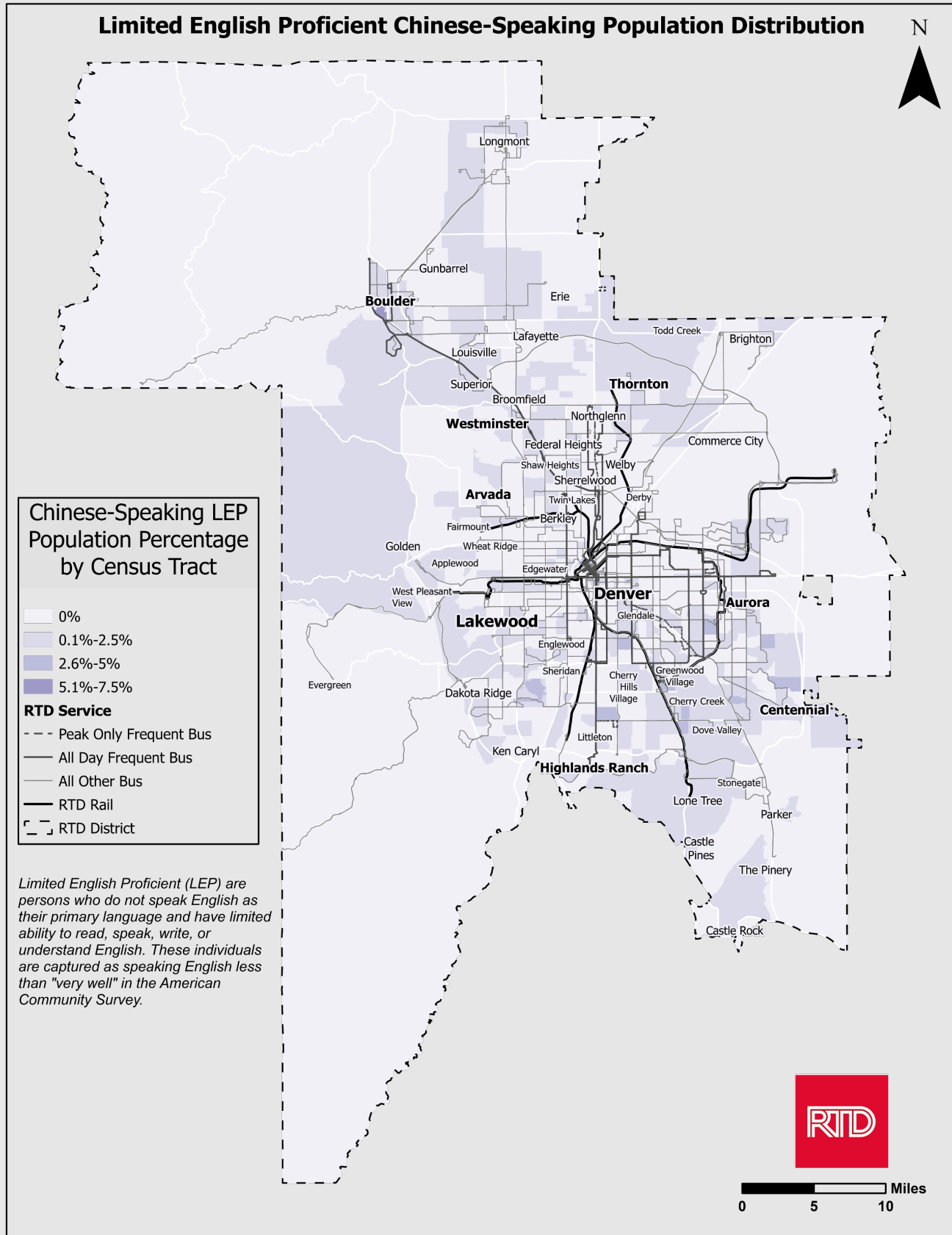
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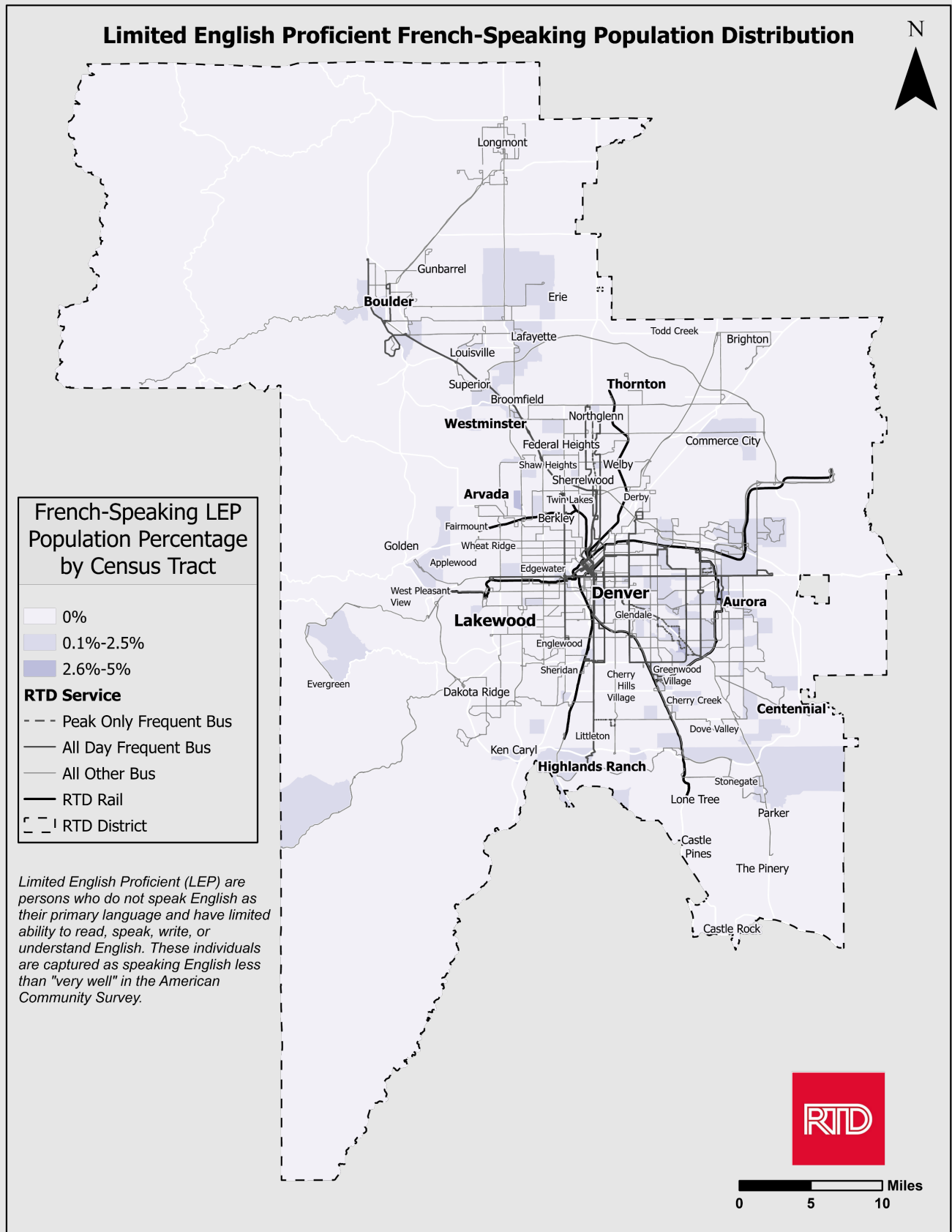
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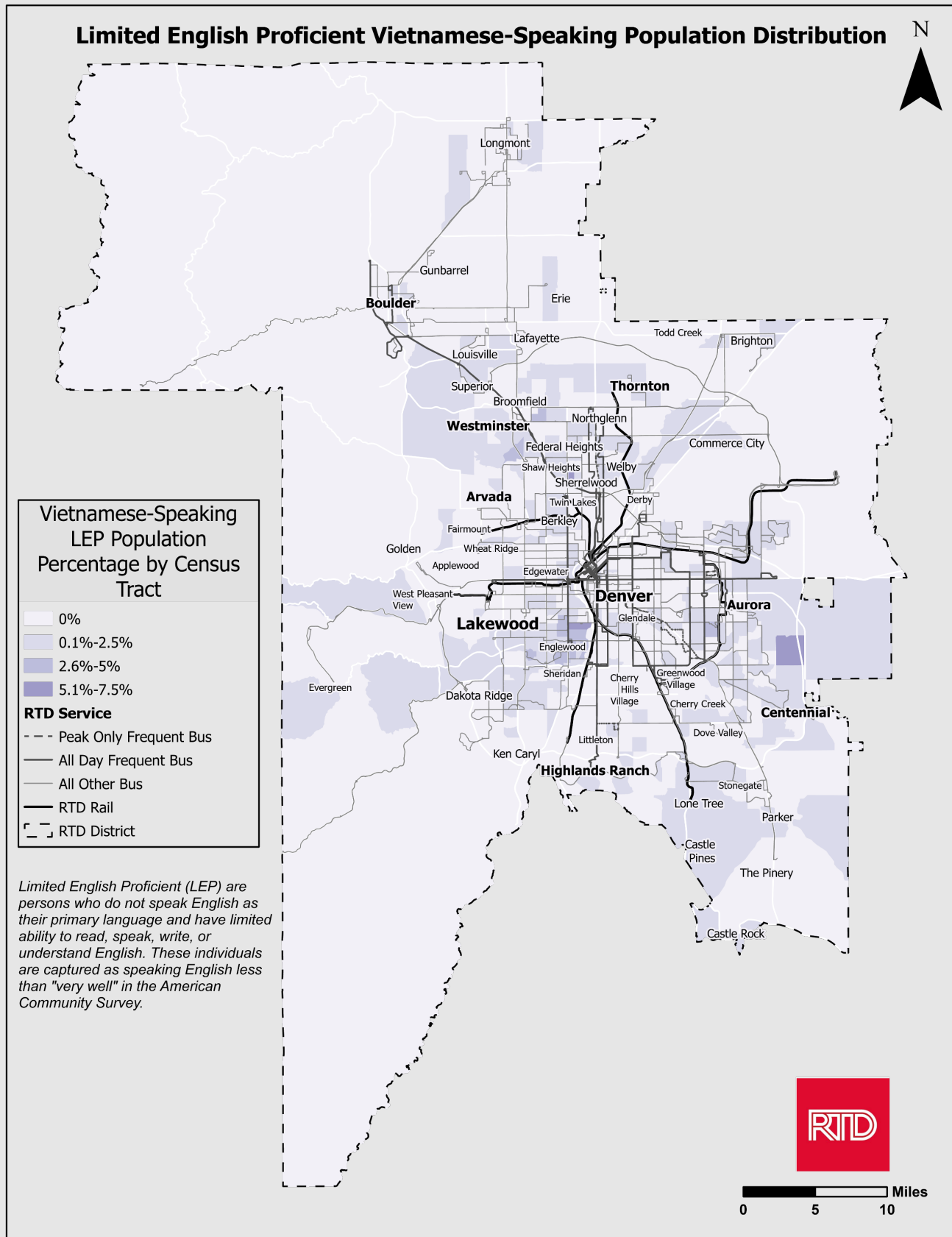
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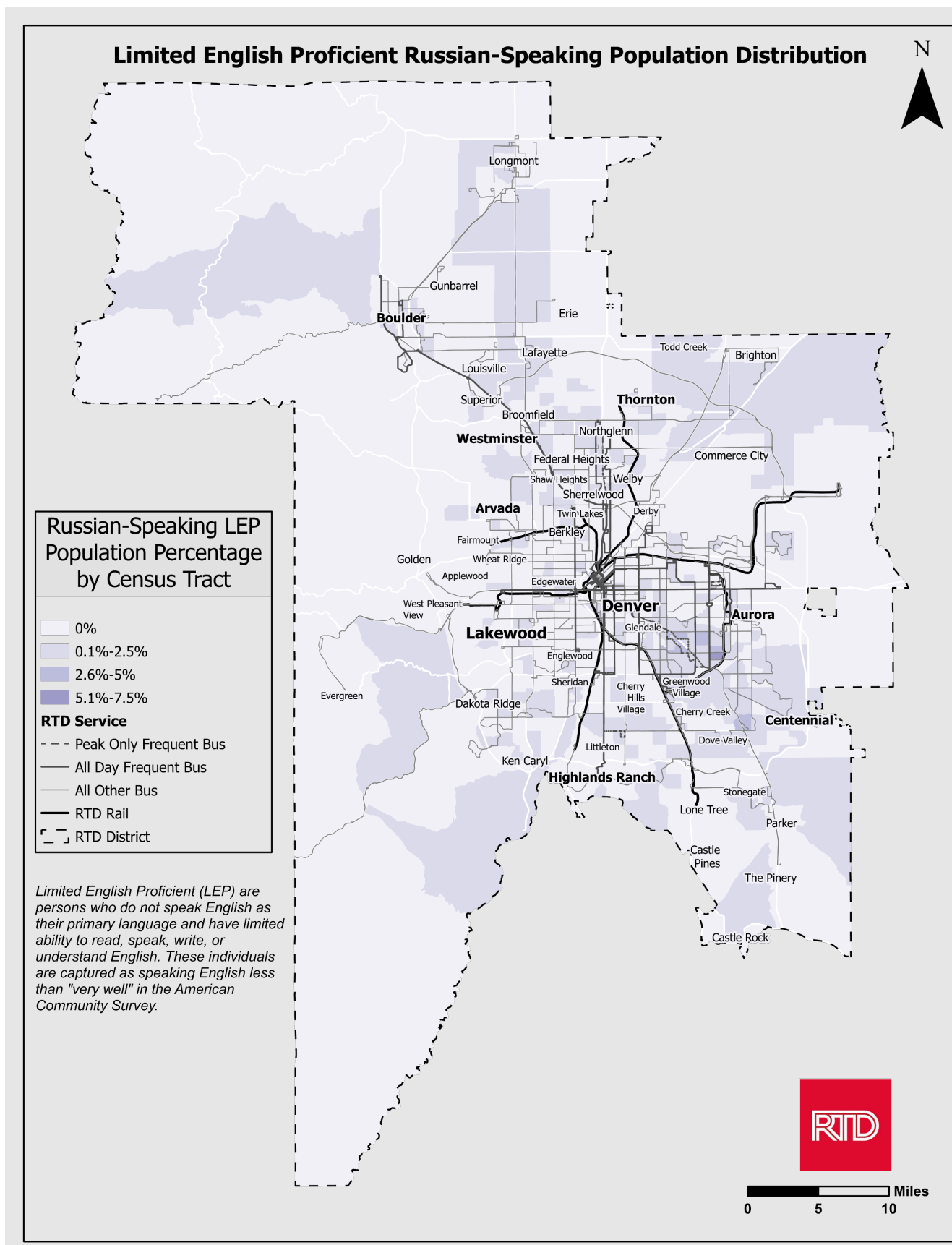
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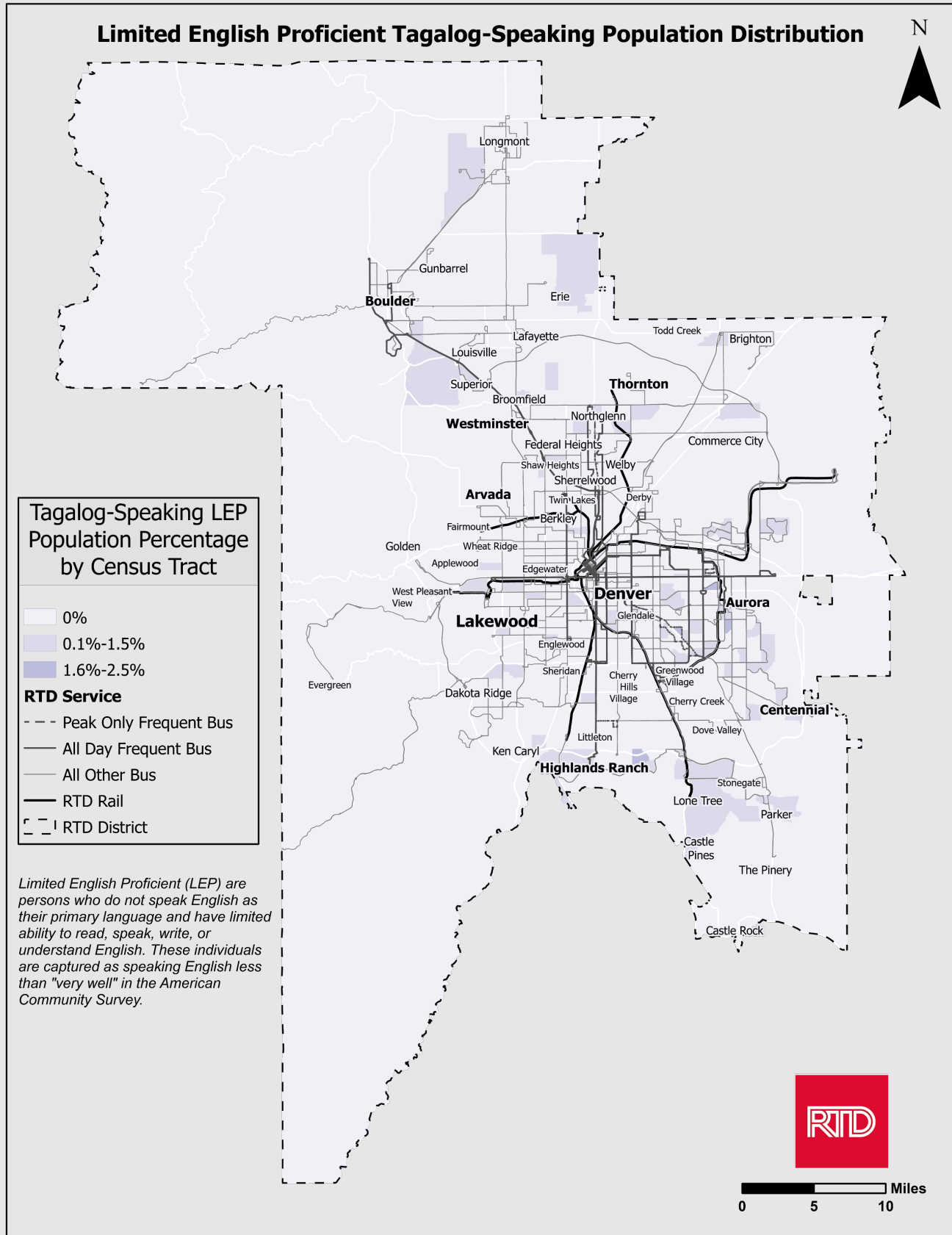
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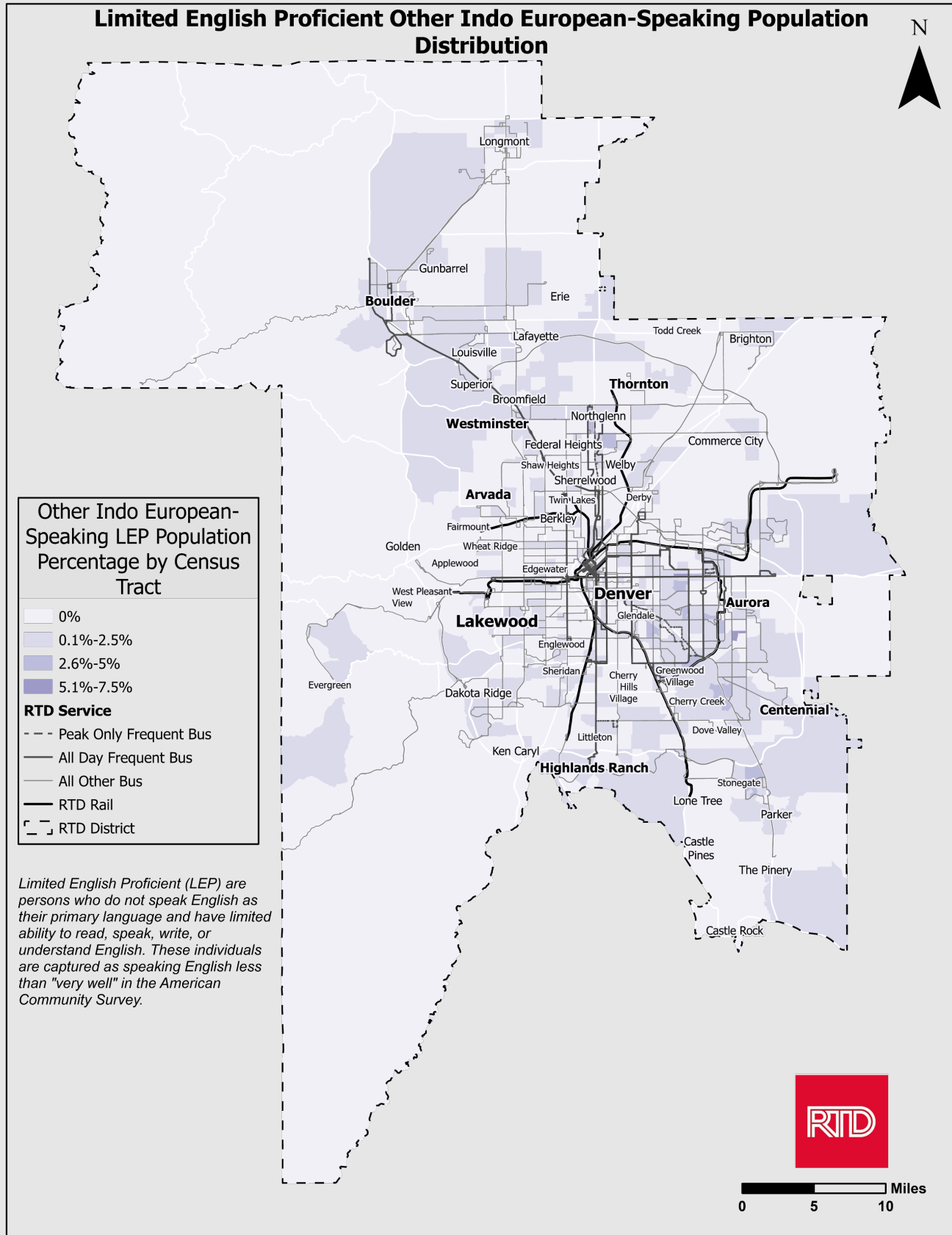
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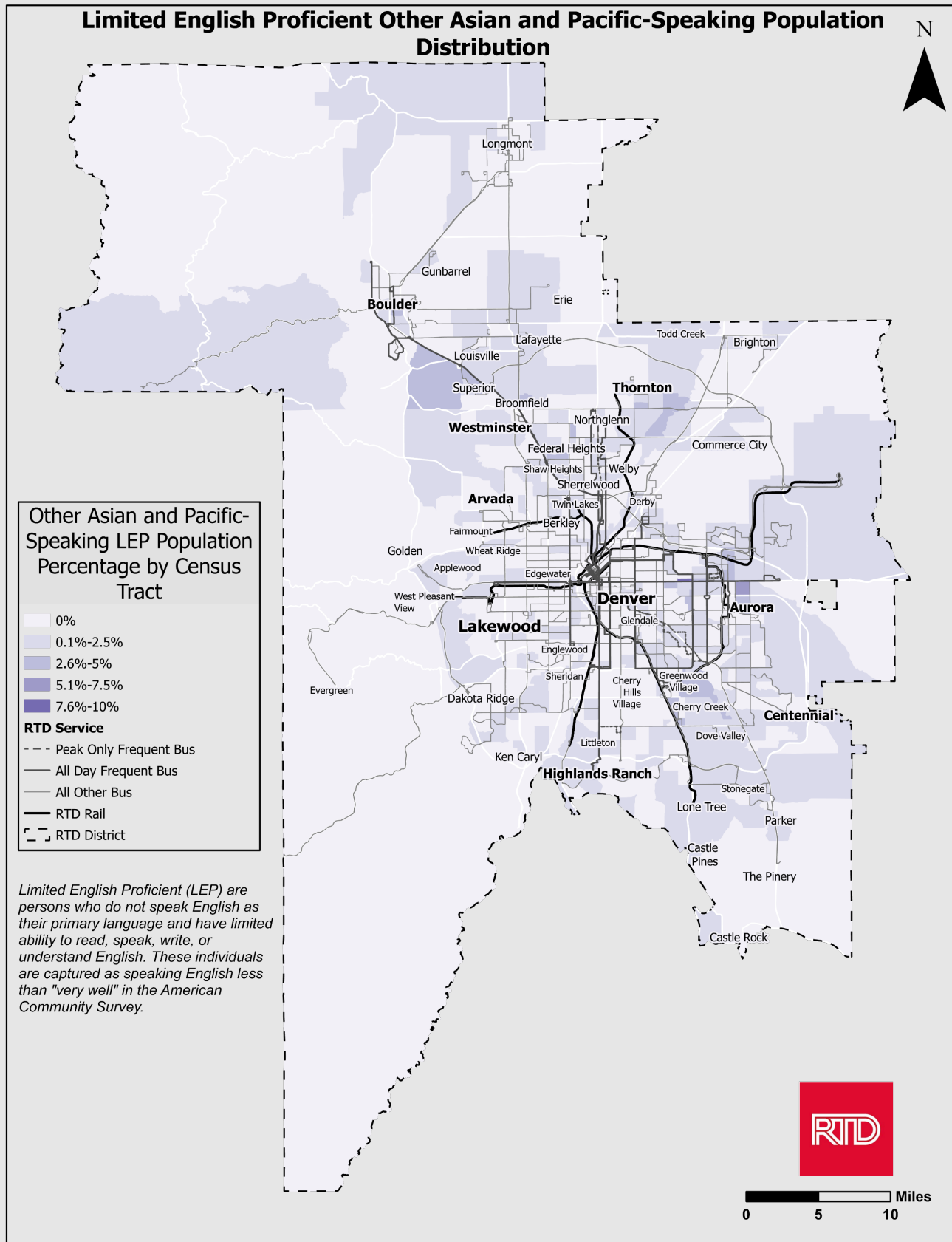
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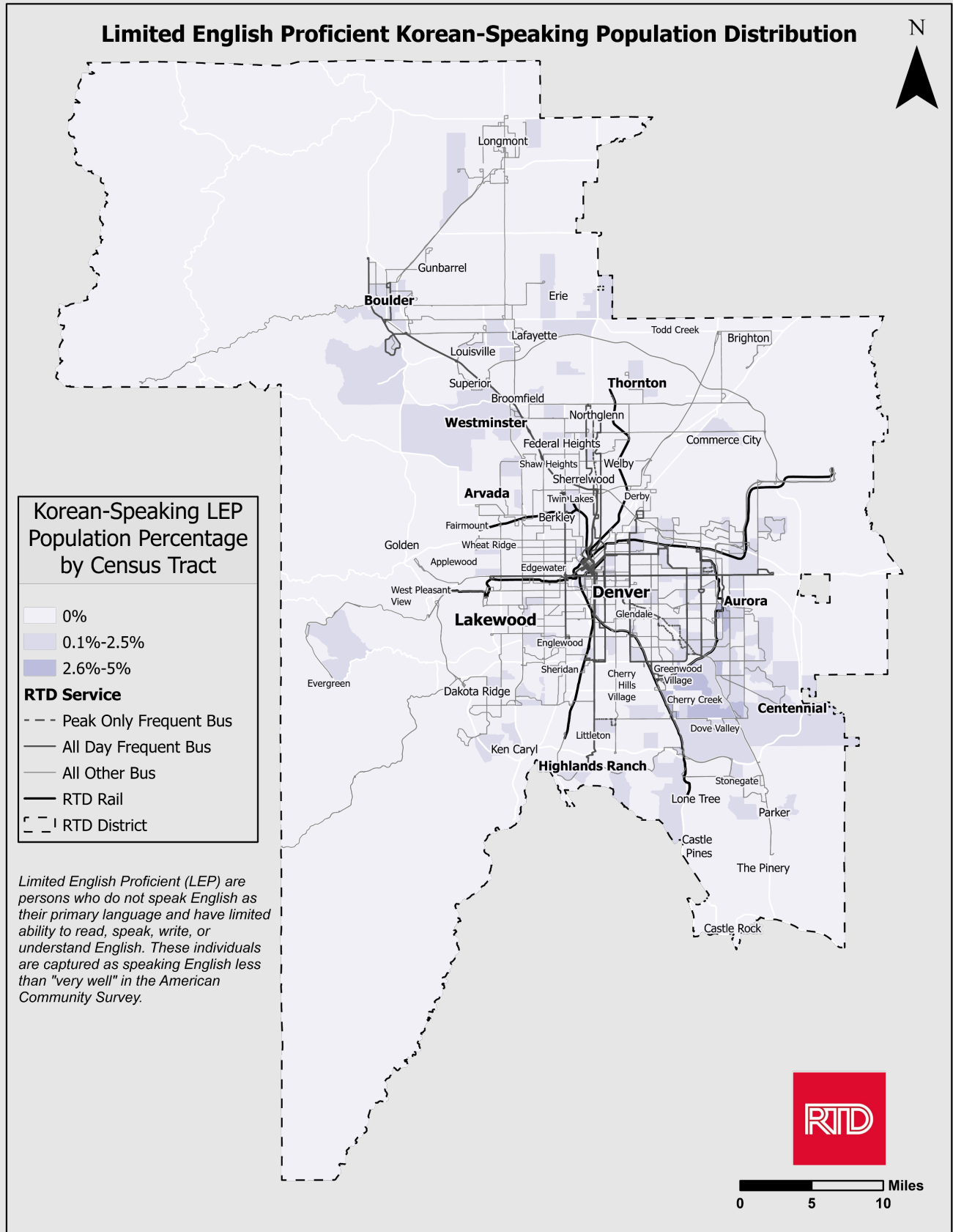
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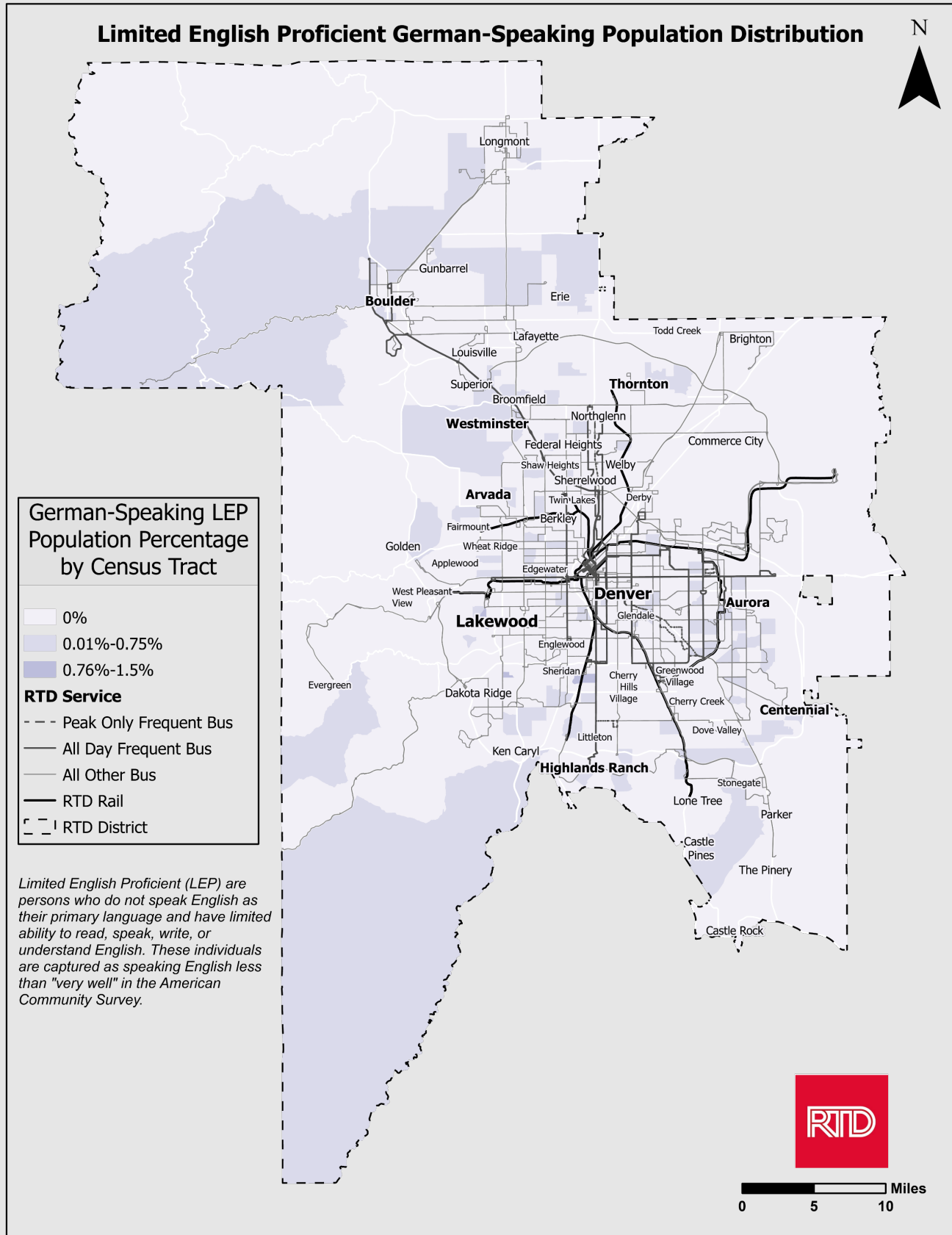
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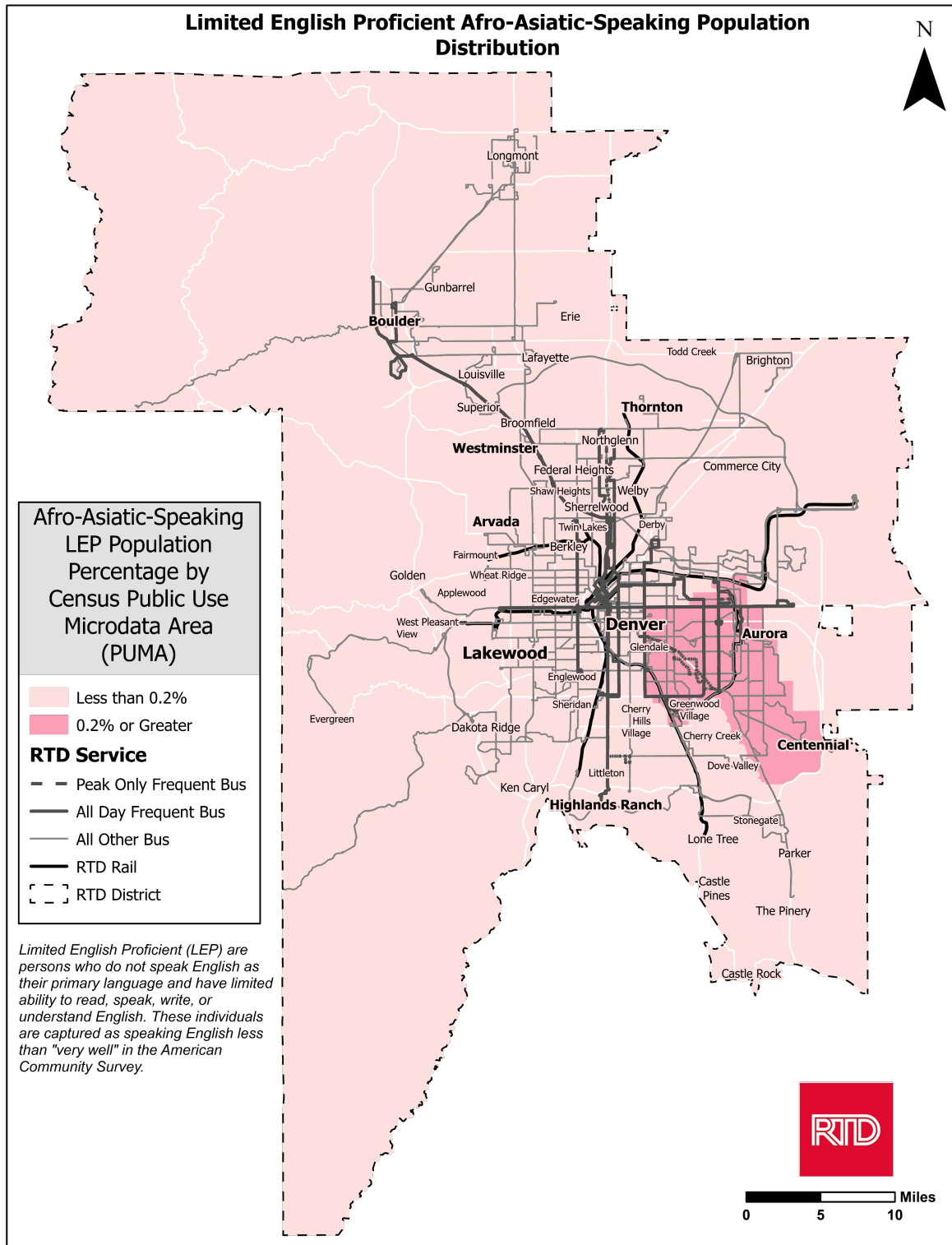


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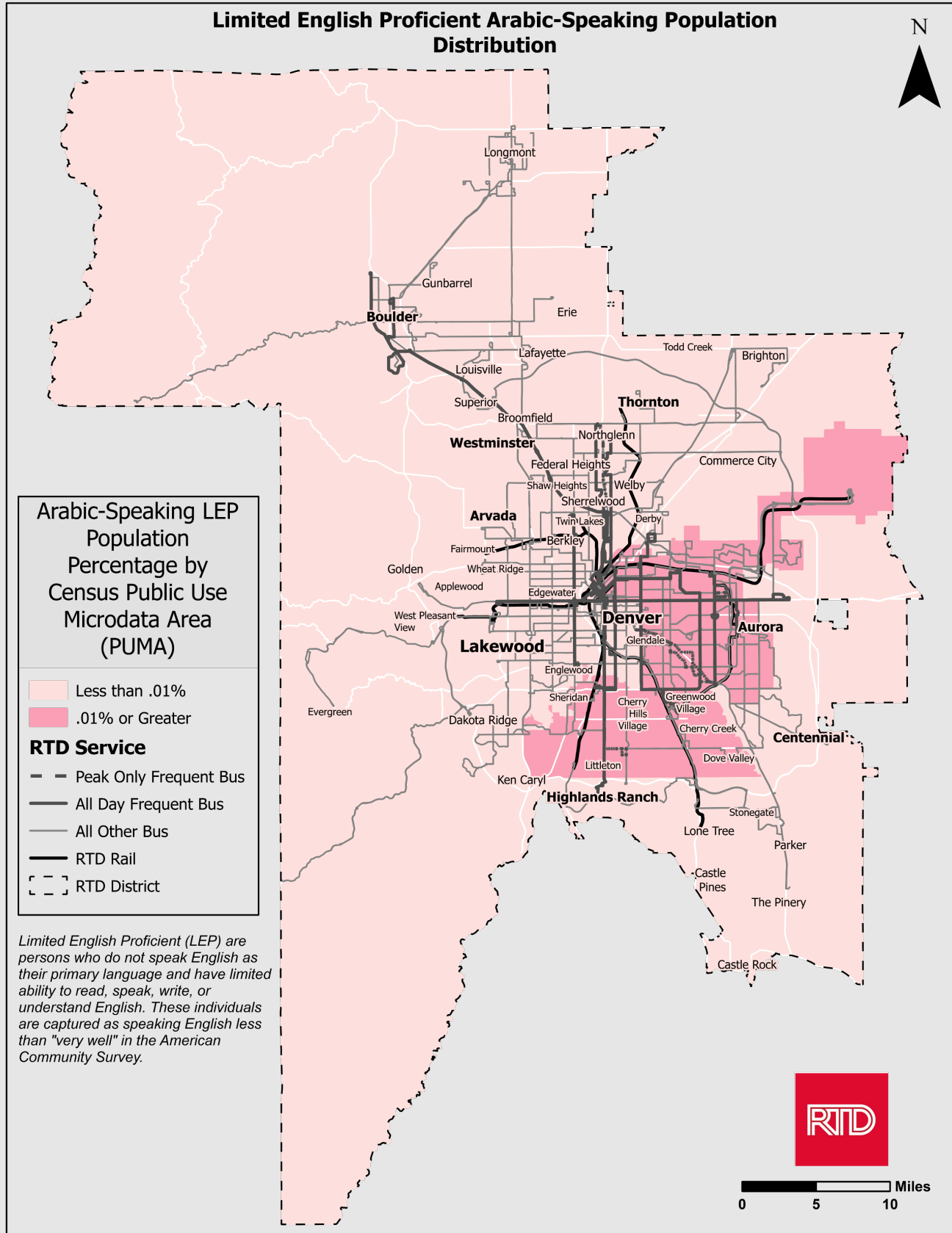


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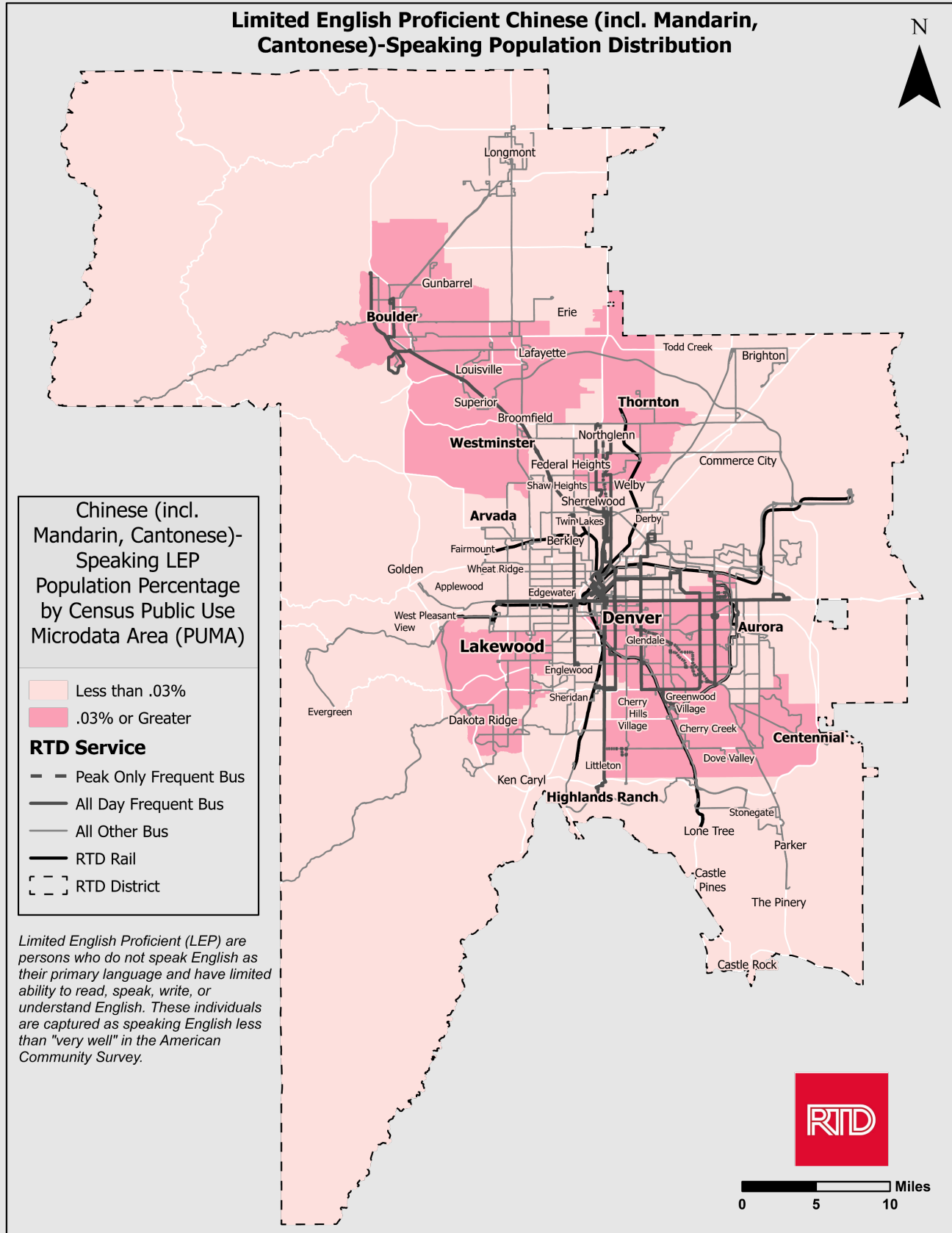
Appendix B: LEP PUMS Maps



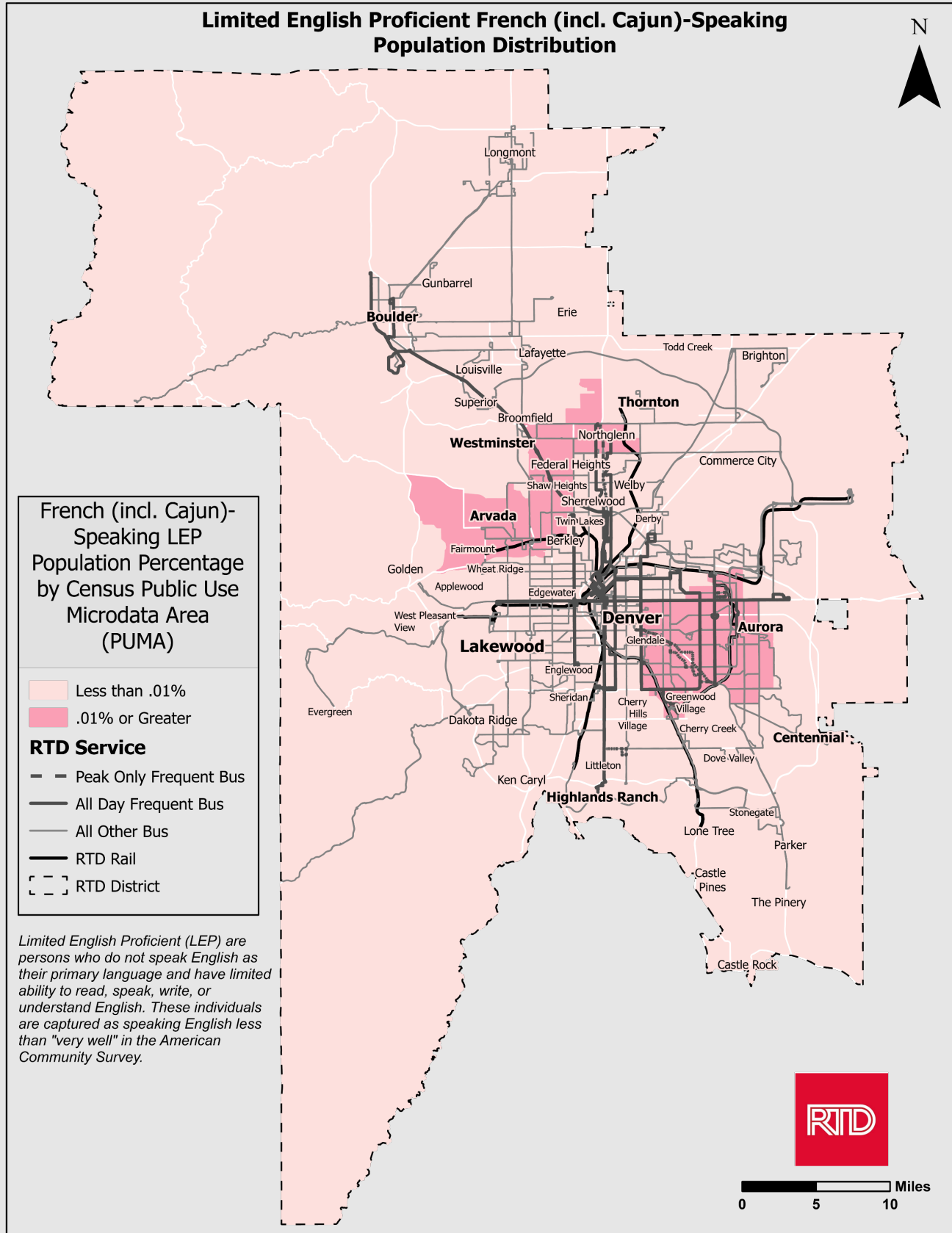
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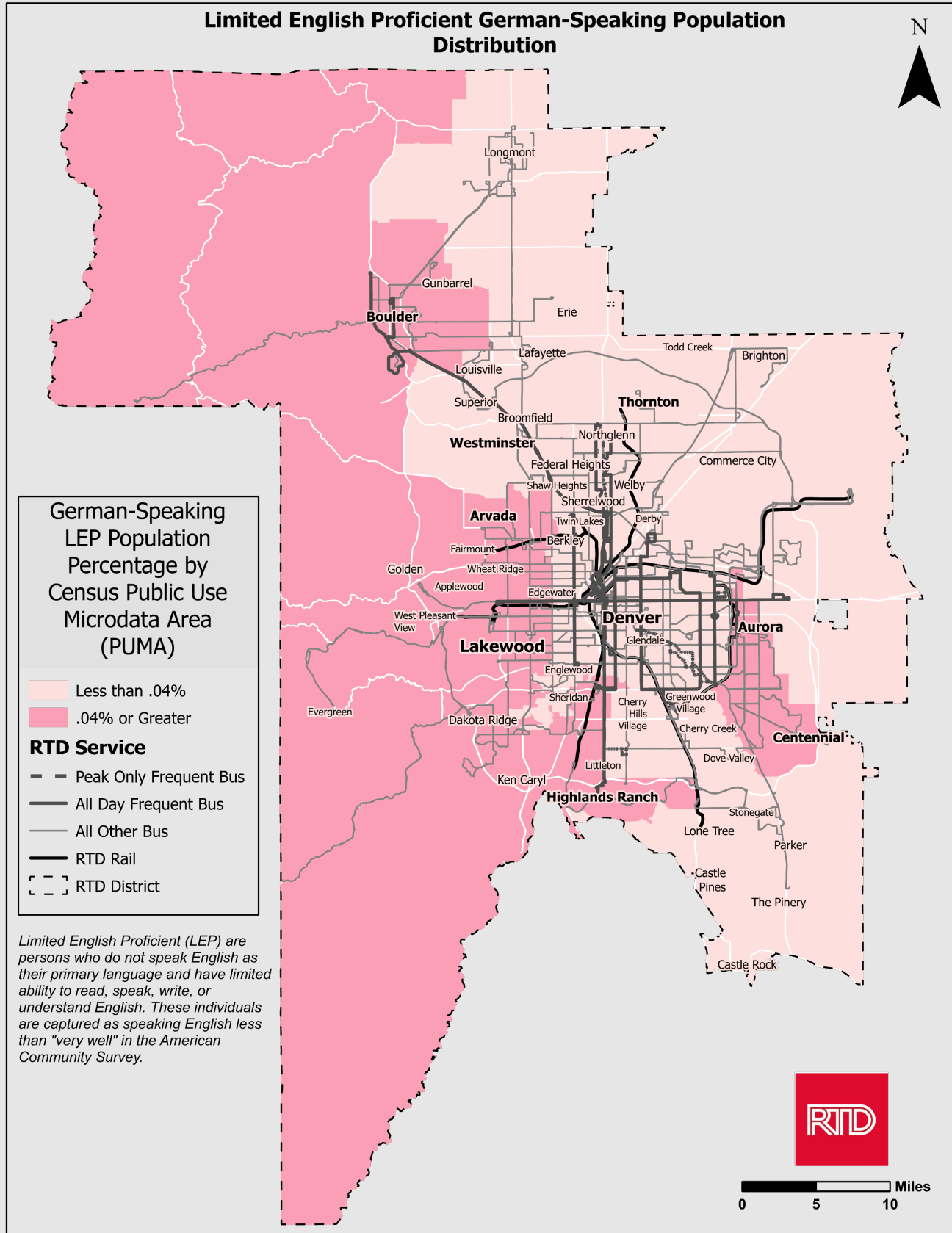
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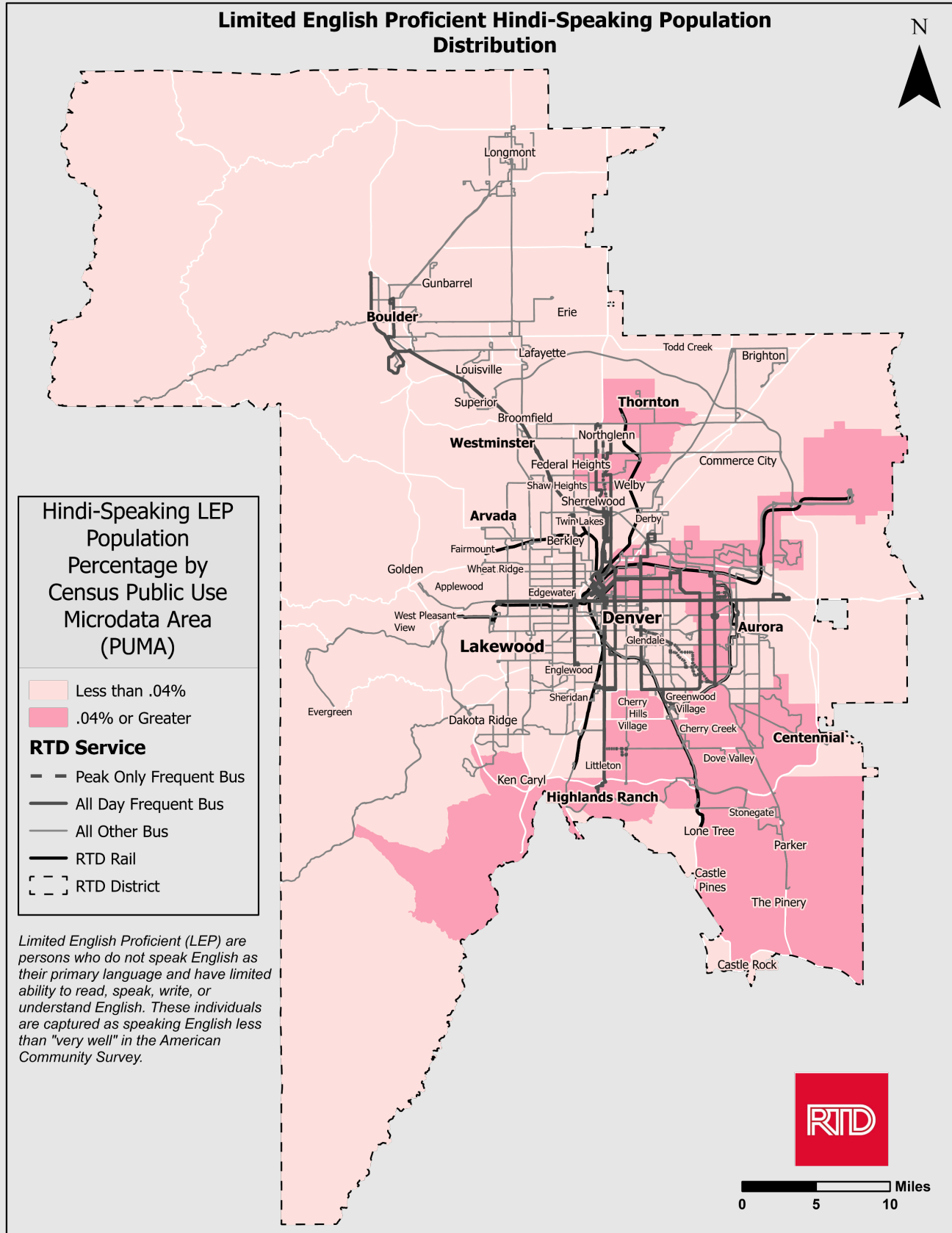
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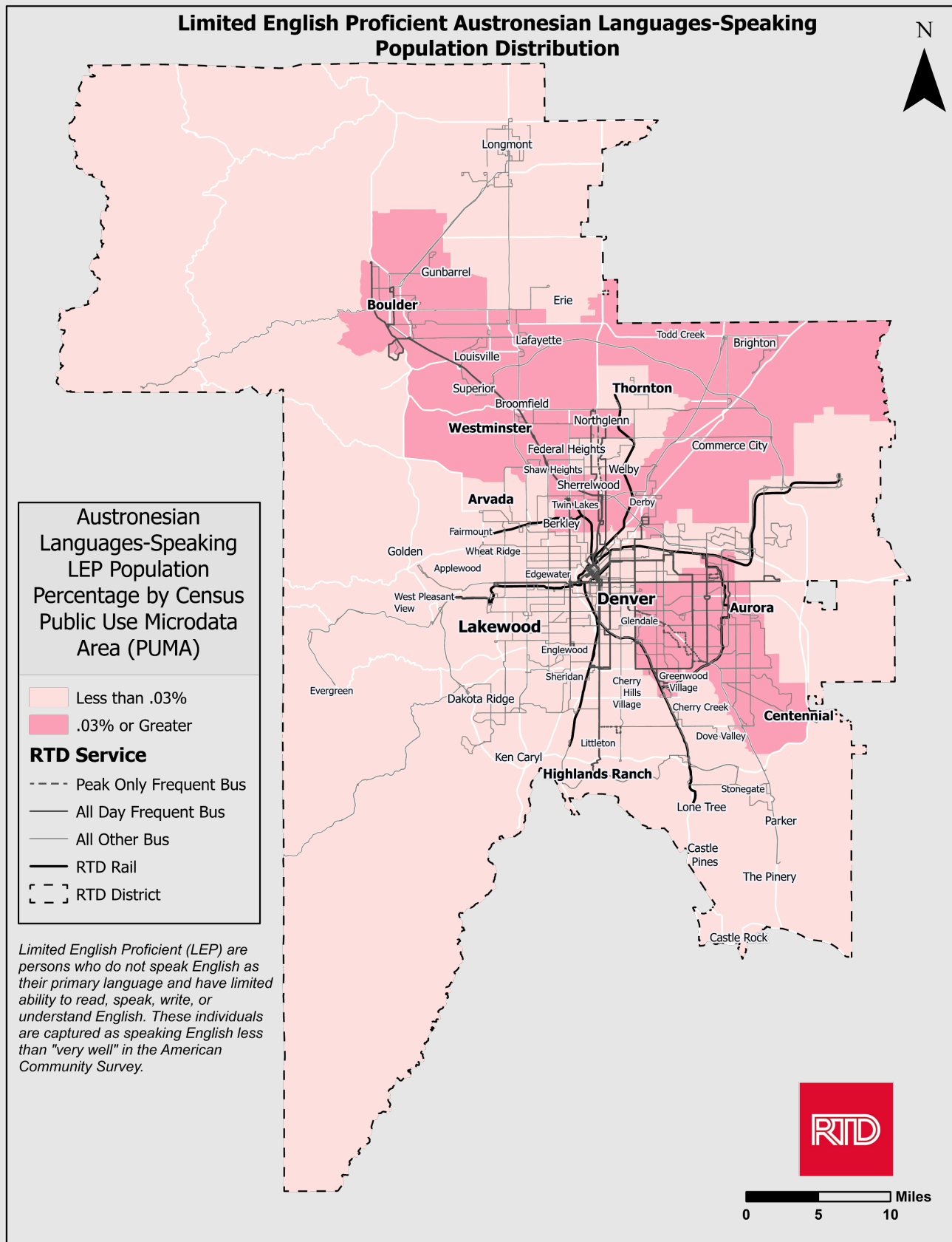
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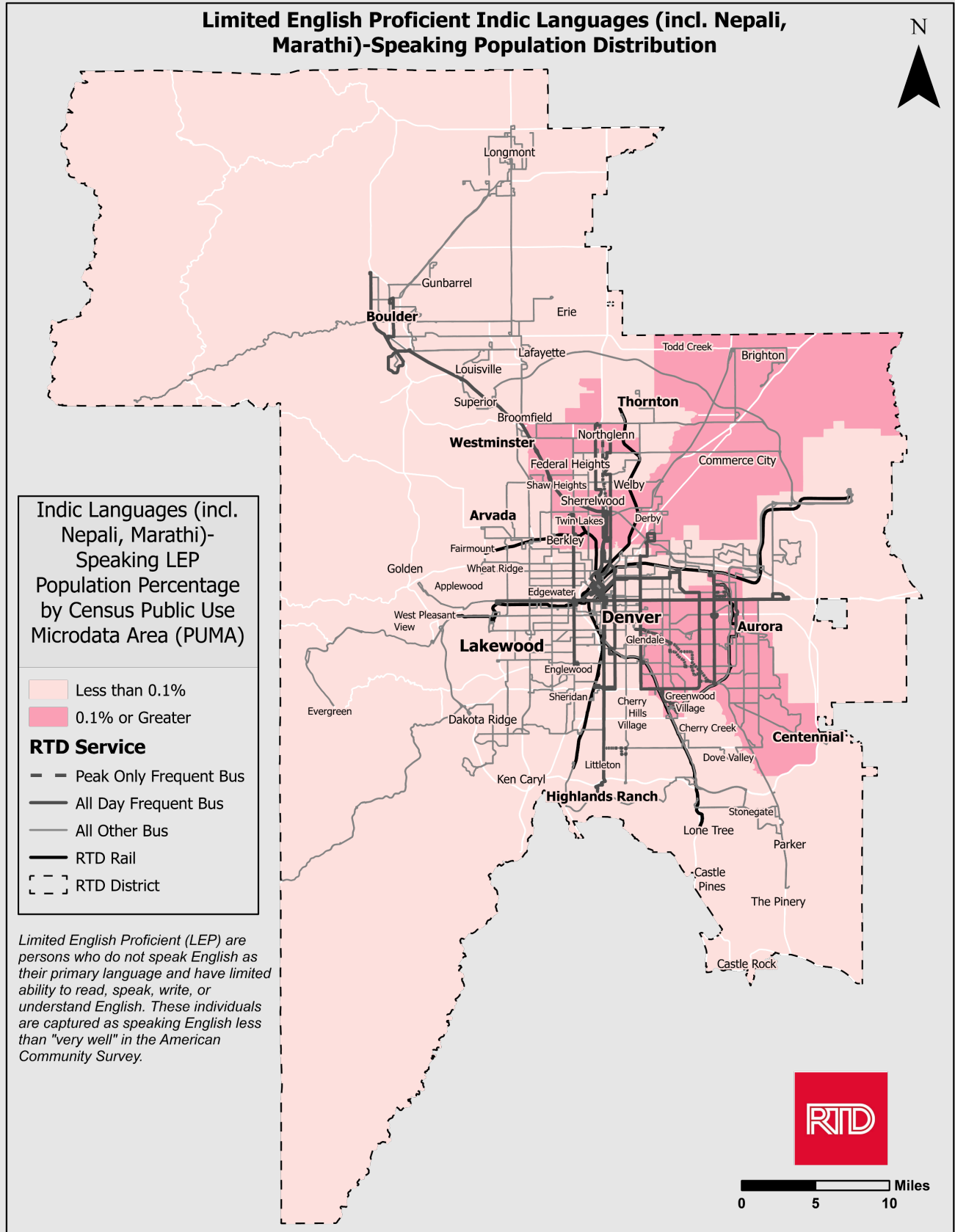
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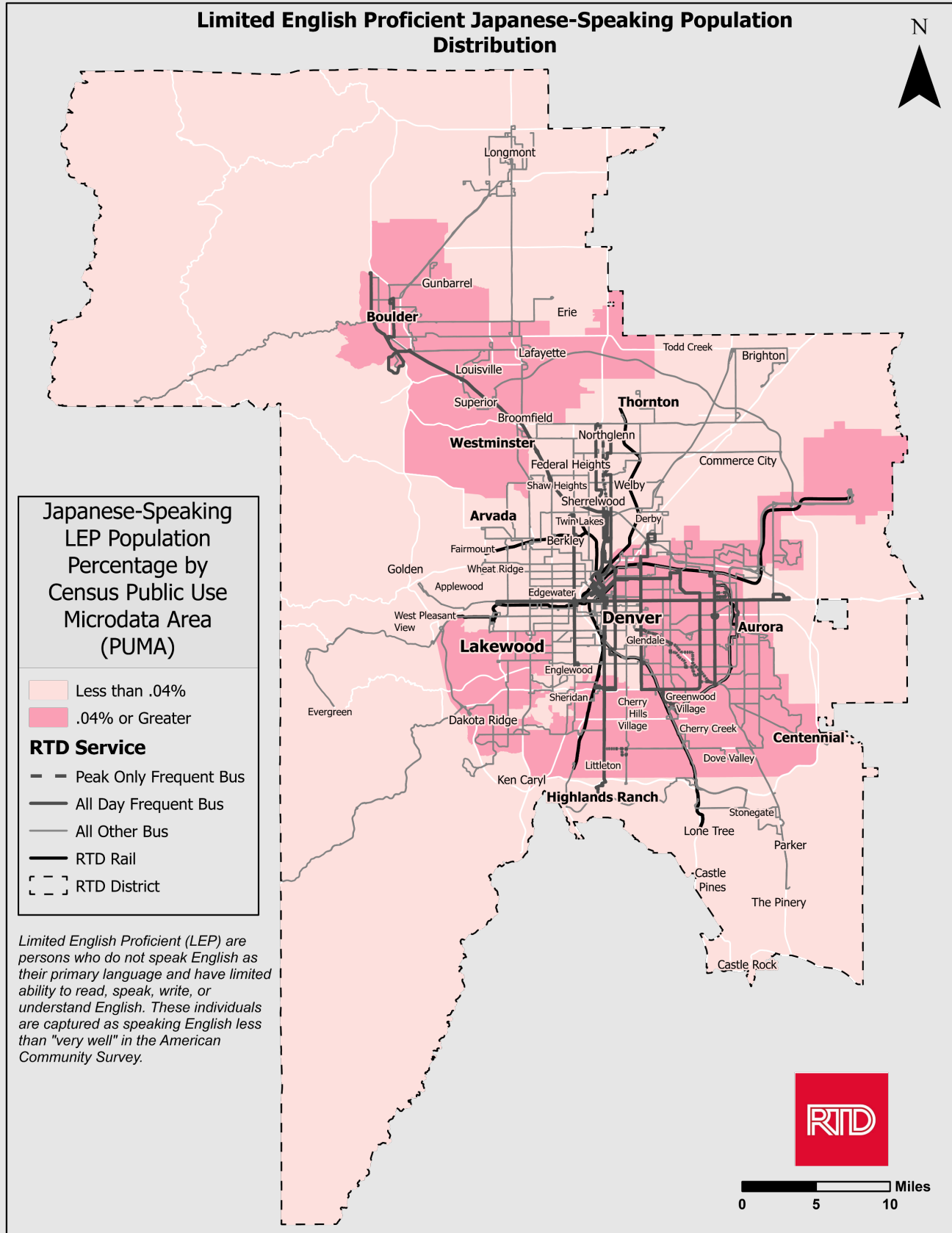
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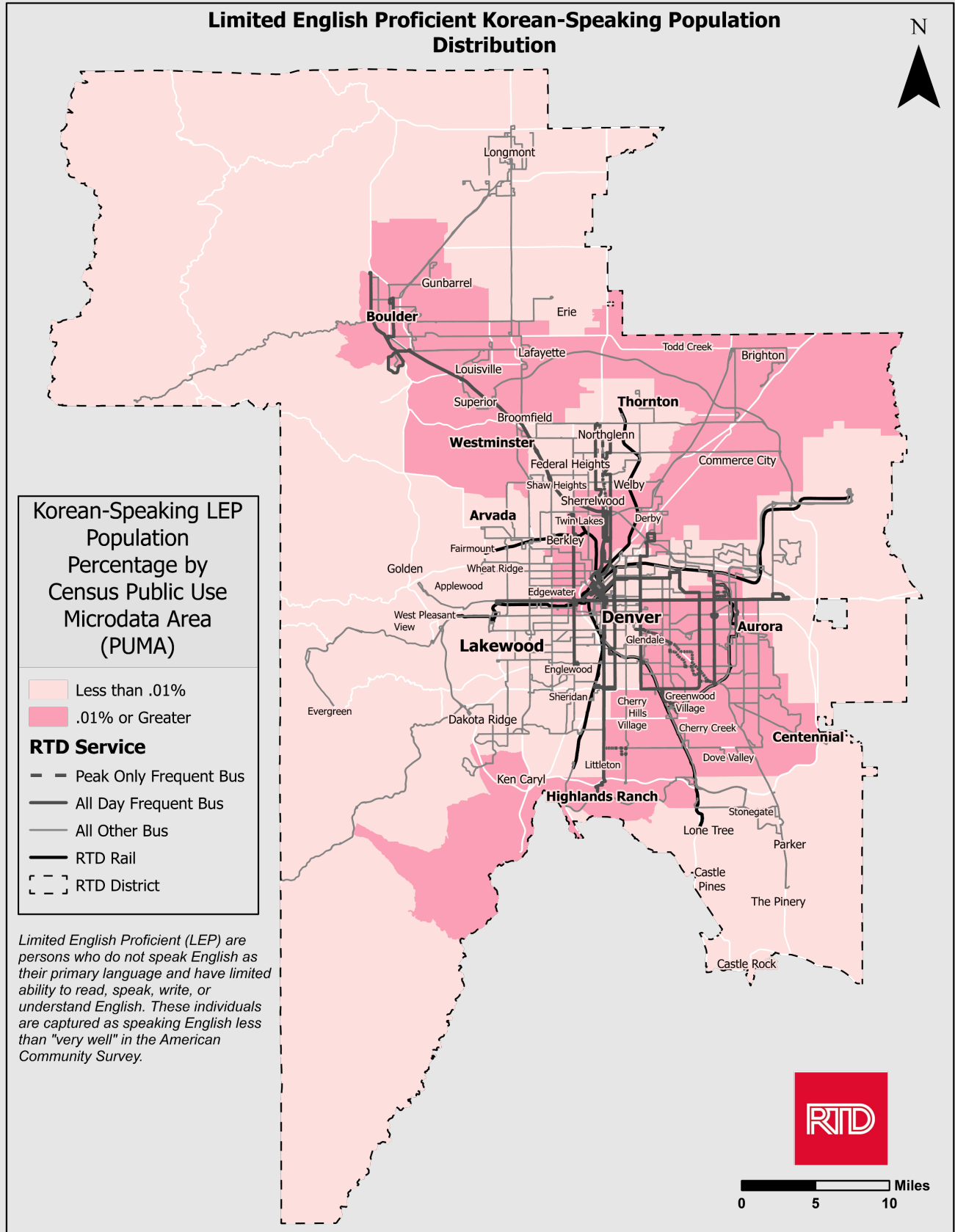
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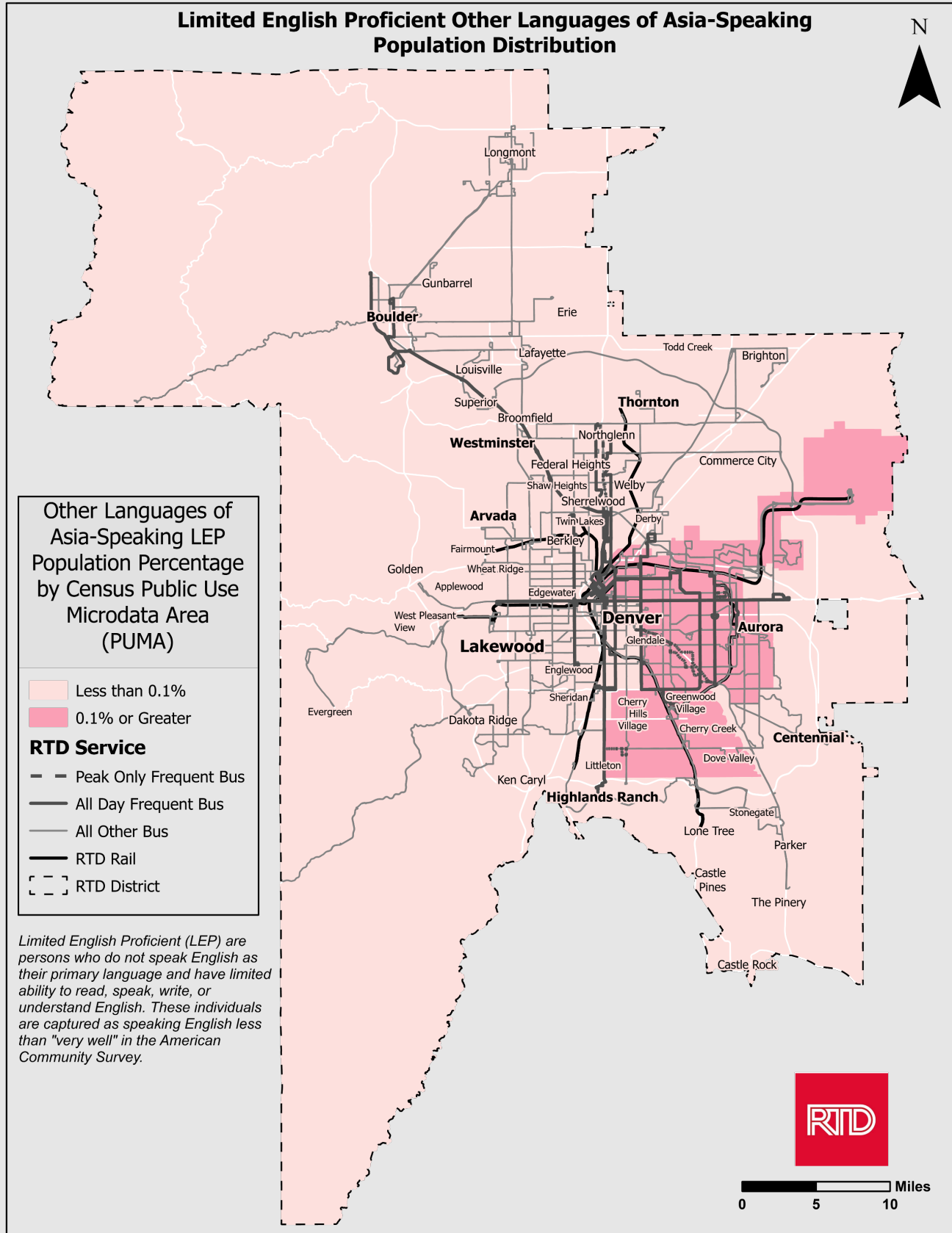
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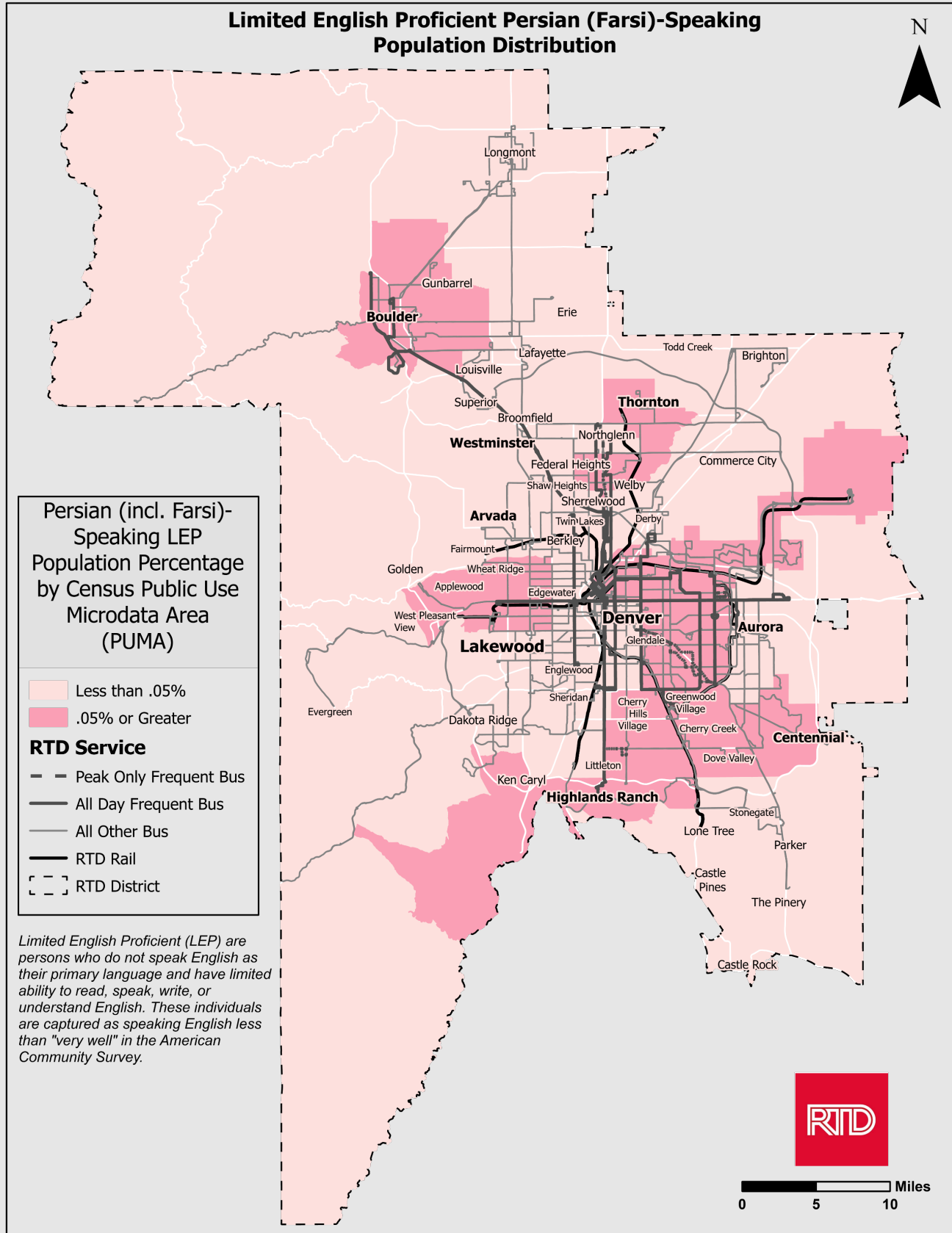
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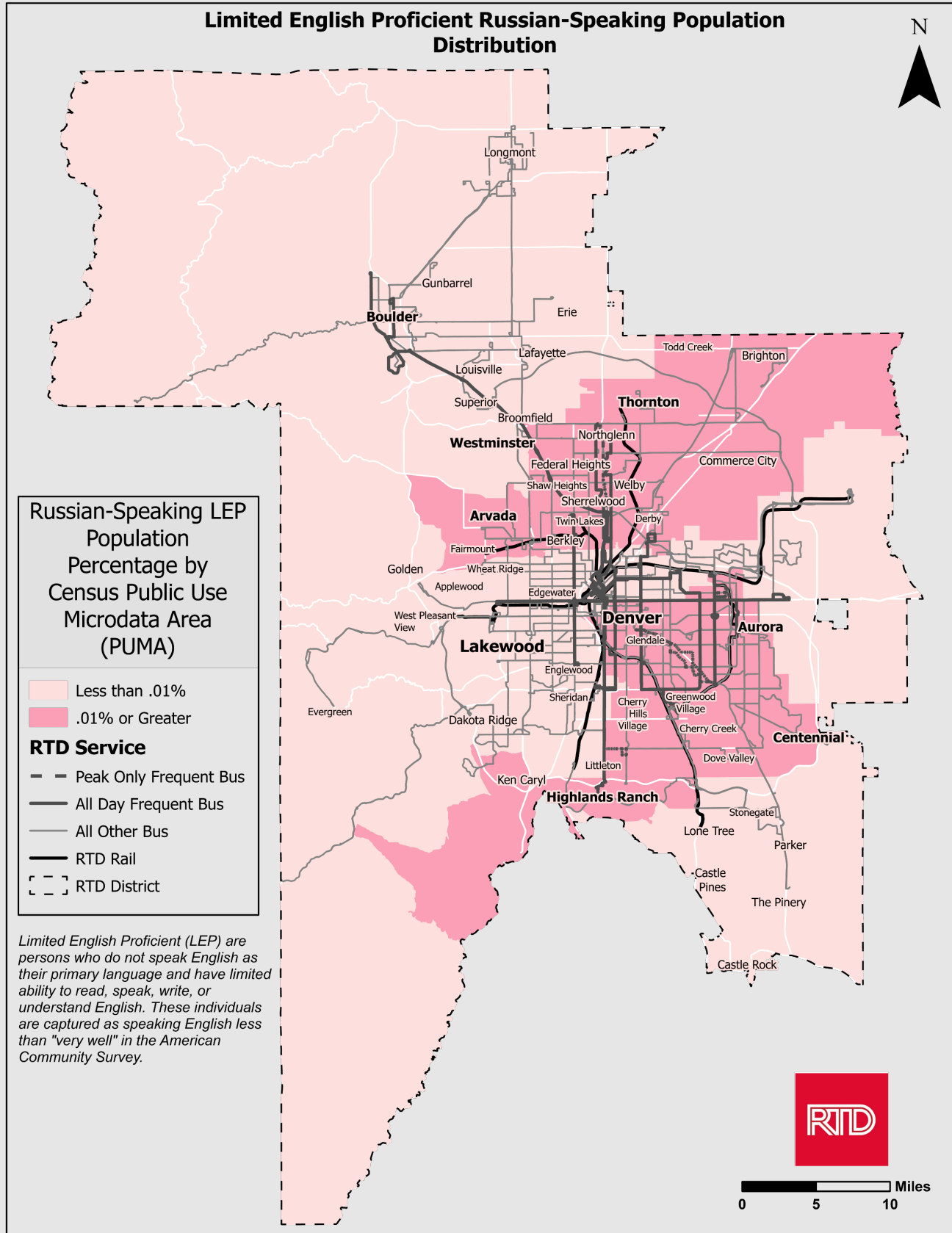
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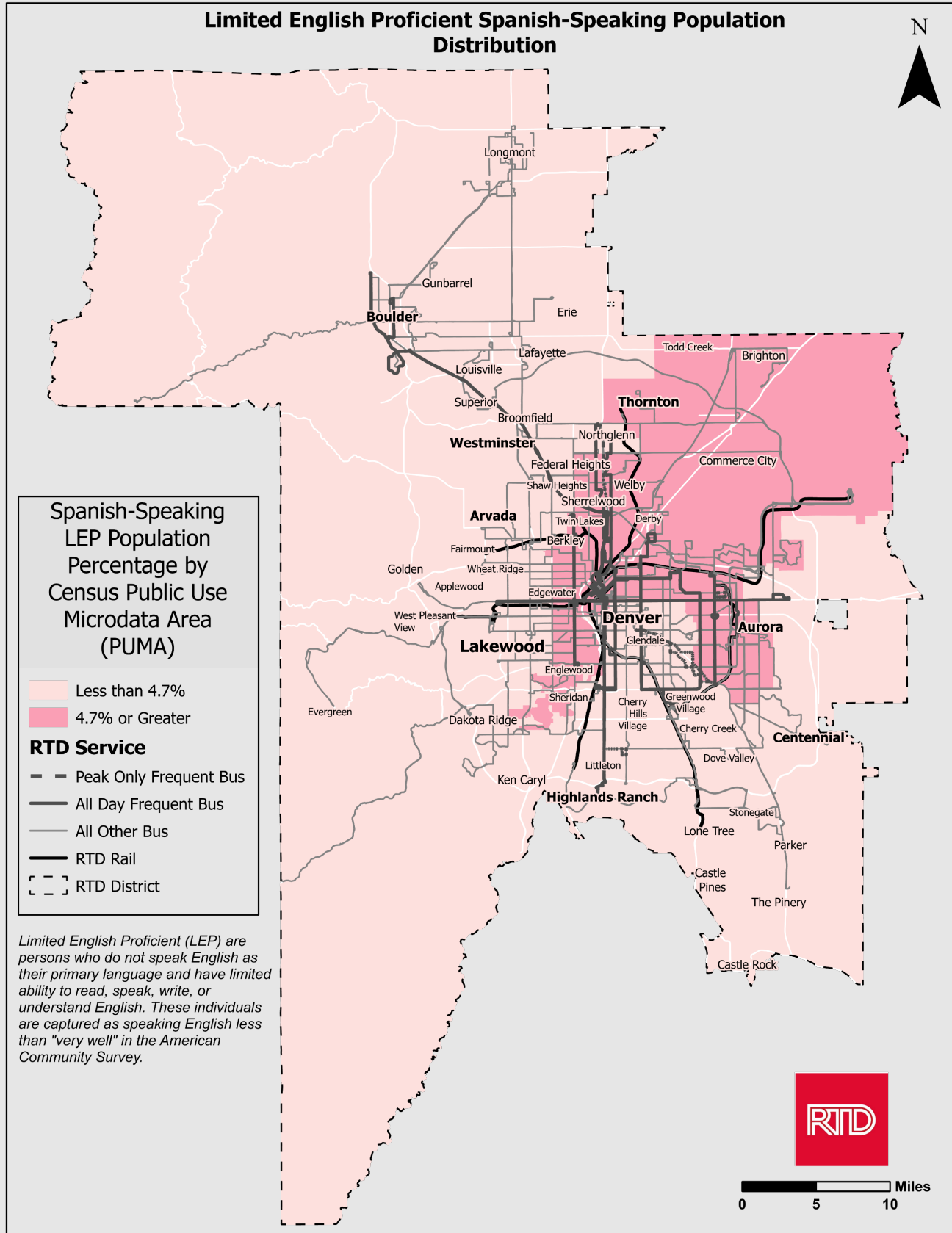
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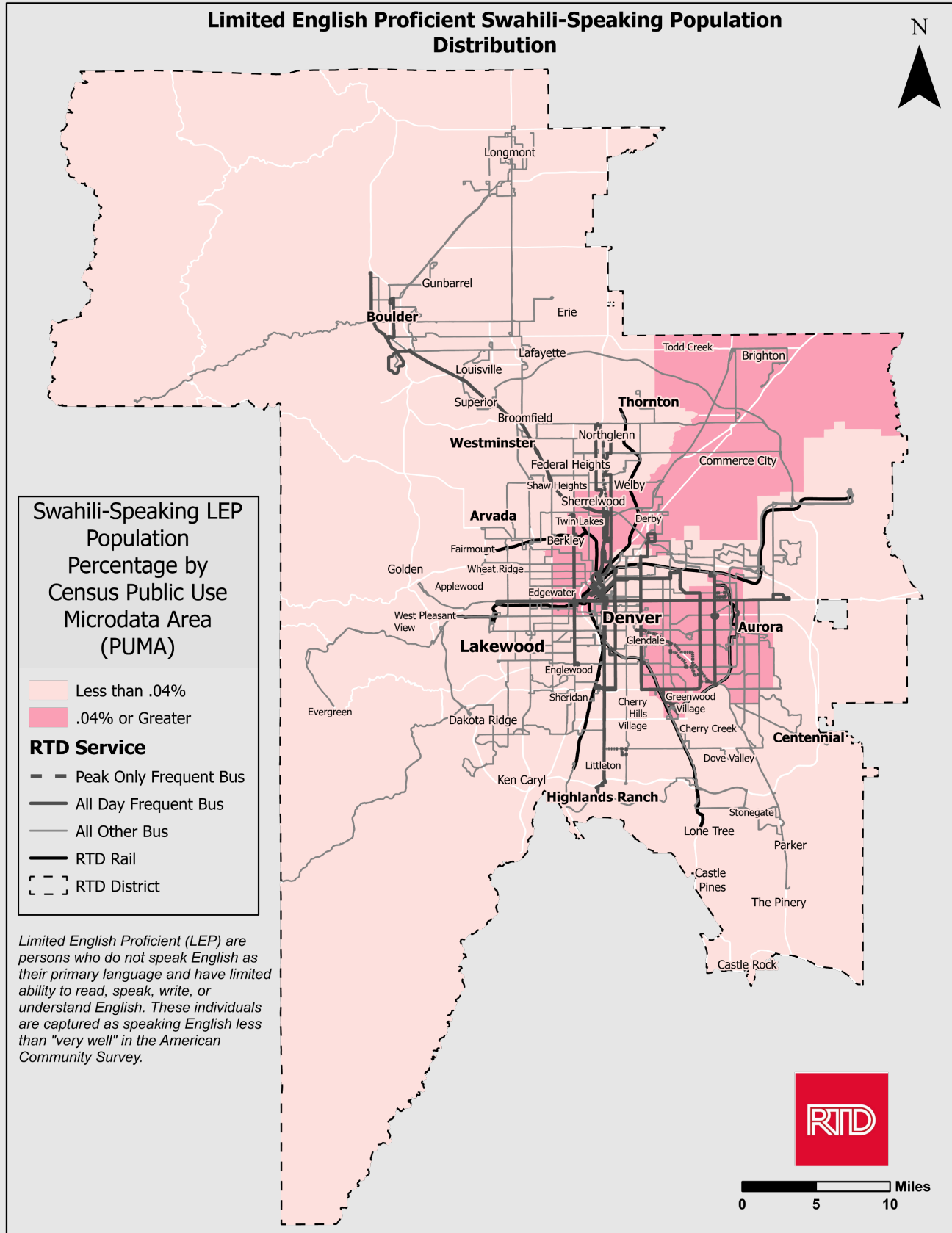
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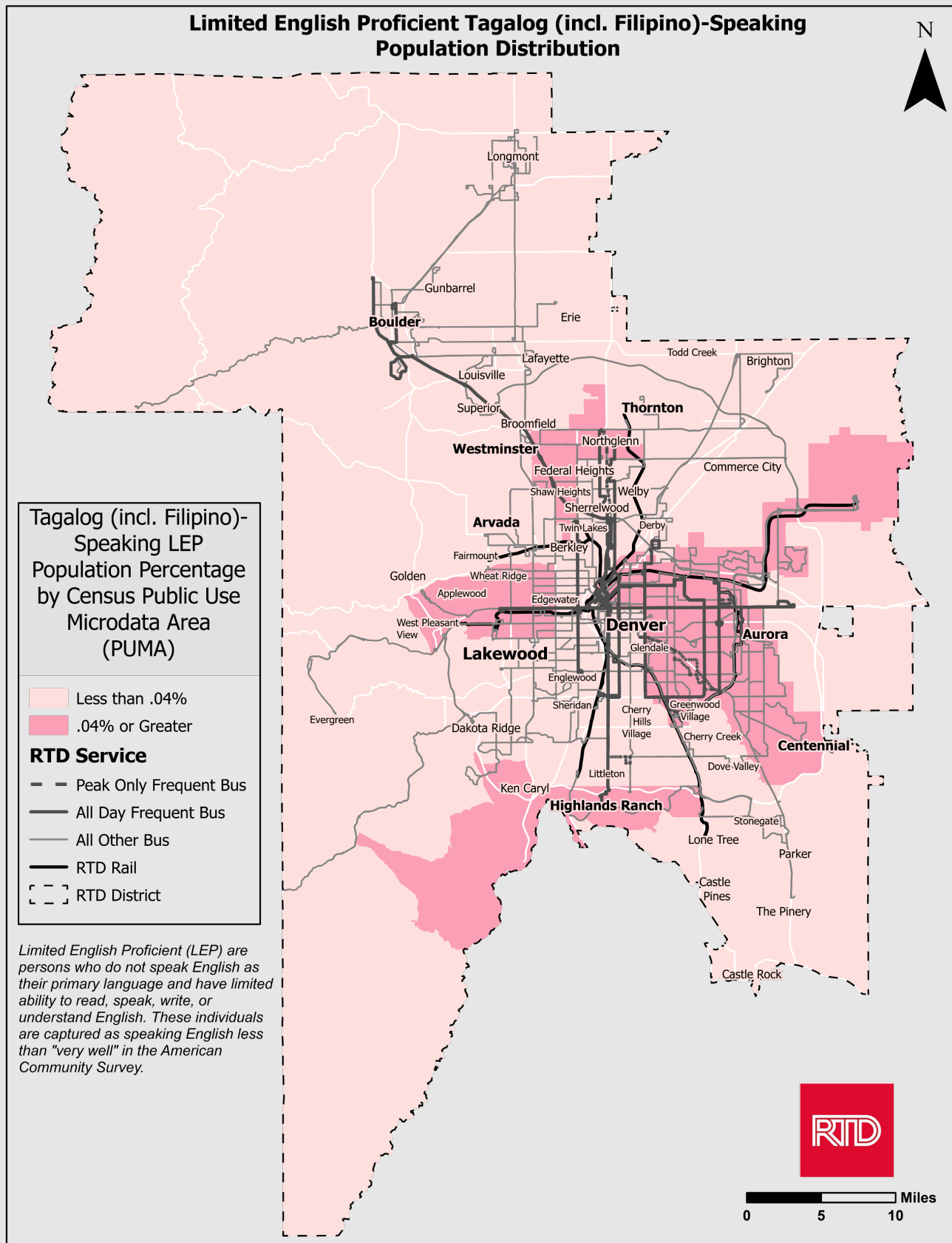
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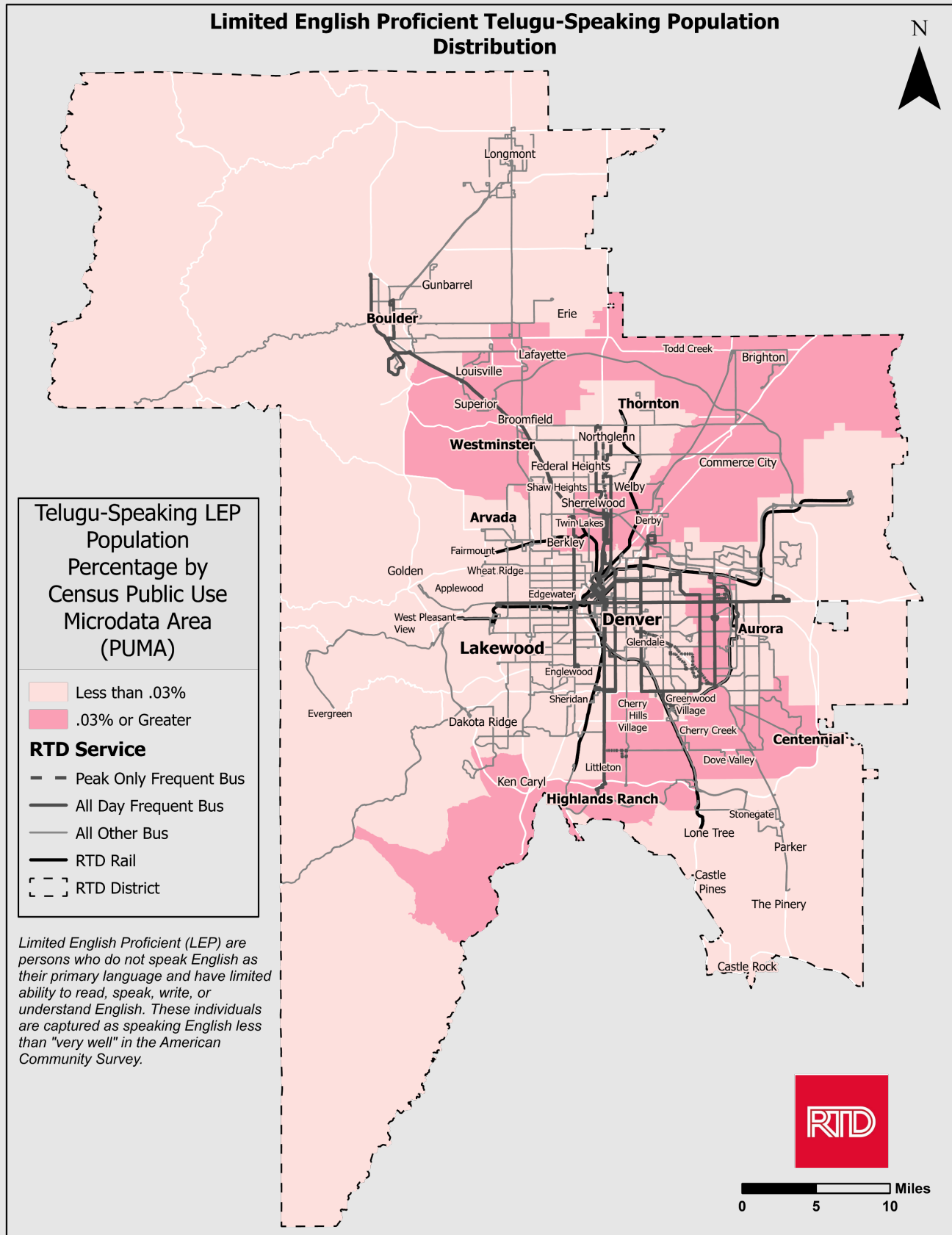
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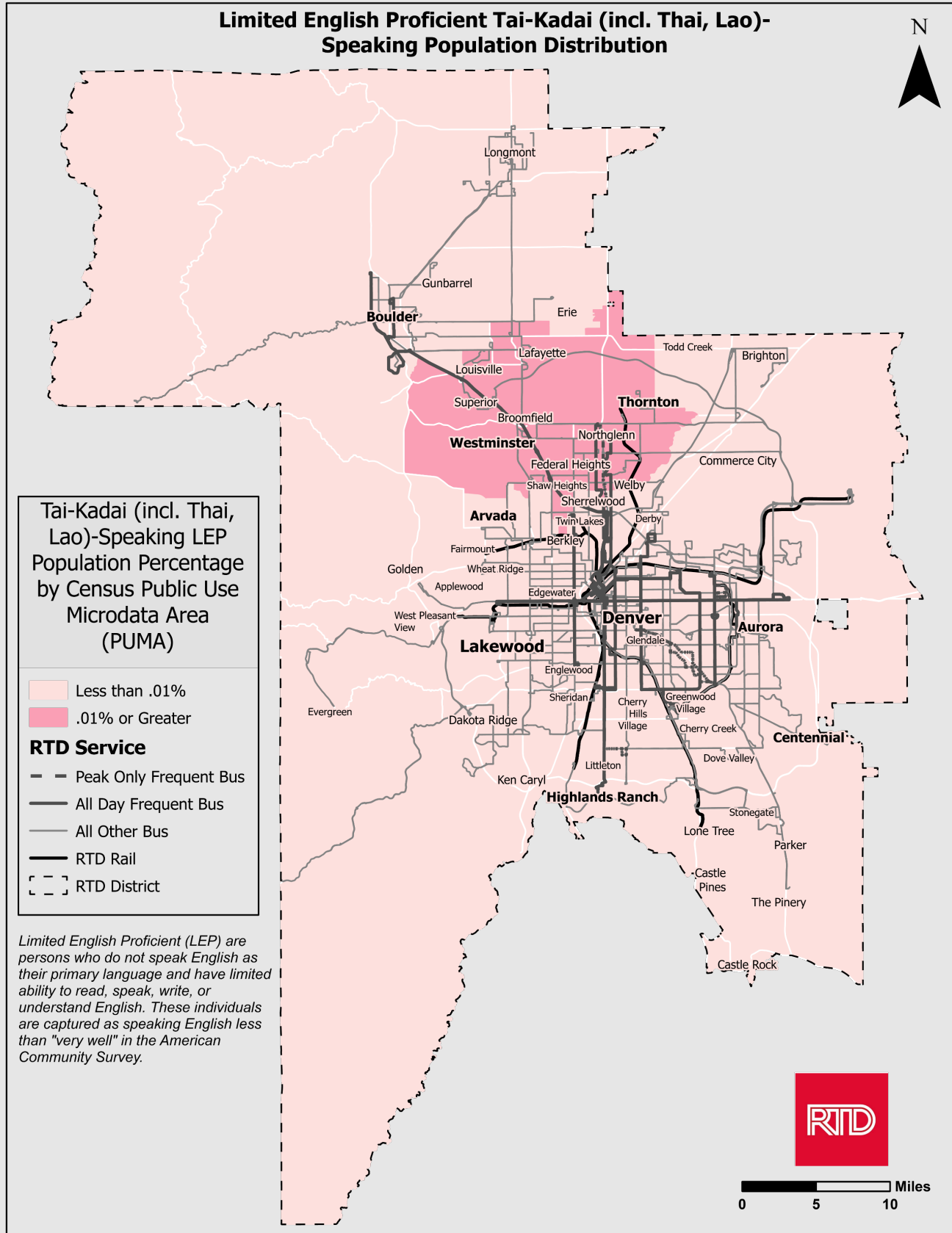
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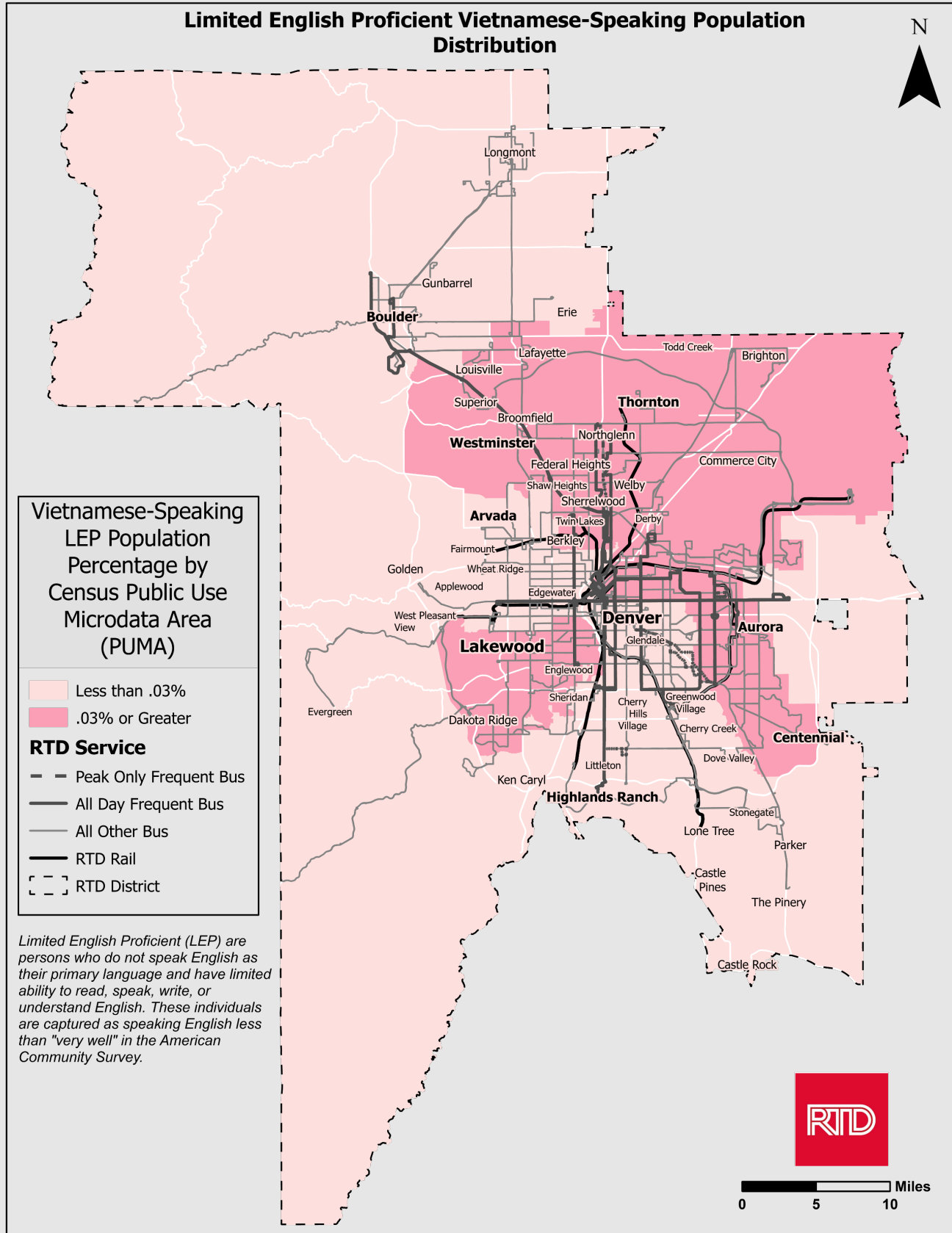
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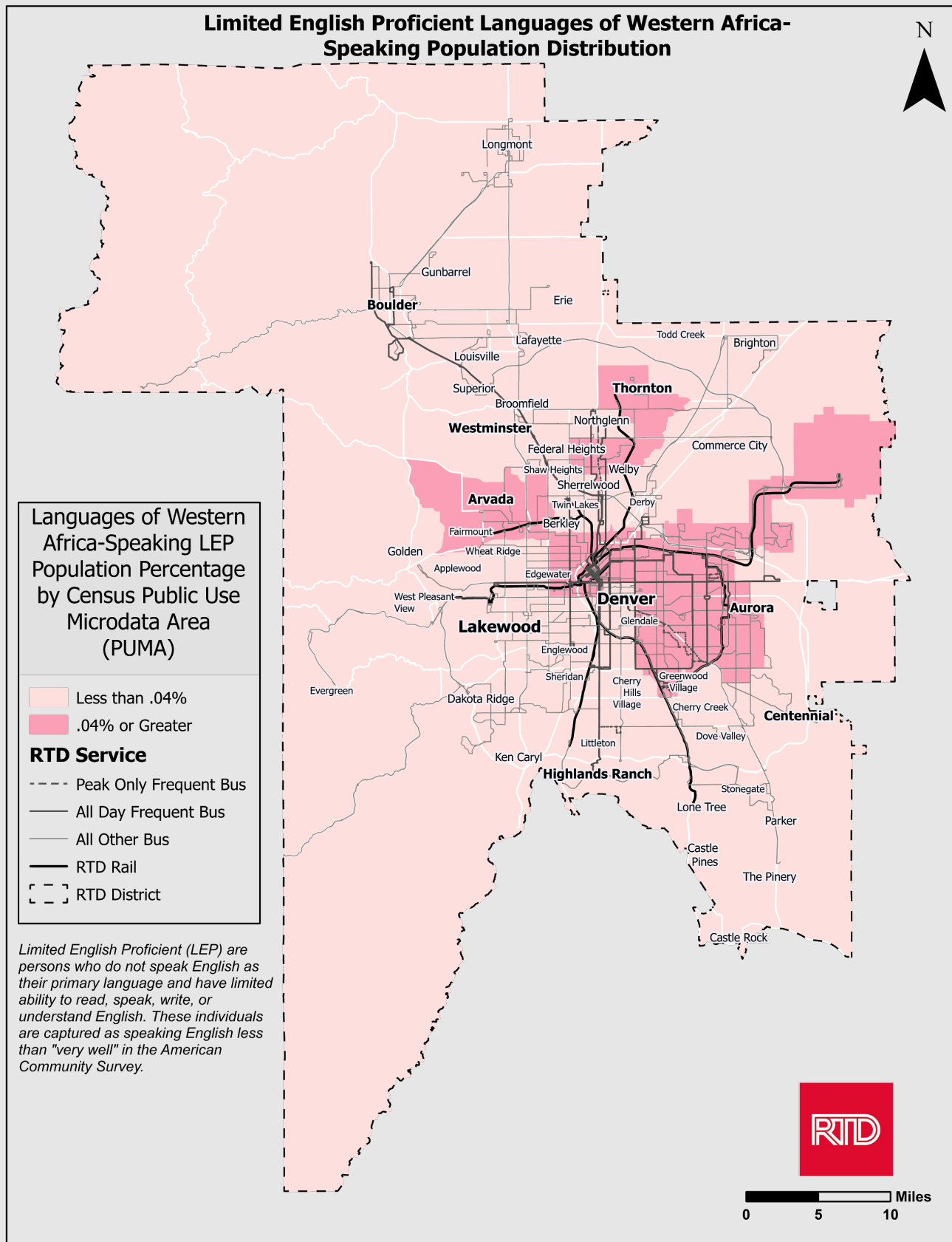
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Four Factor Analysis: Factor 1



Four Factor Analysis: Factor 1



Factor 2: Frequency of Contact with LEP Persons

Prepared by RTD Market Research | July 2021

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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.

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 difficulty 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

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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

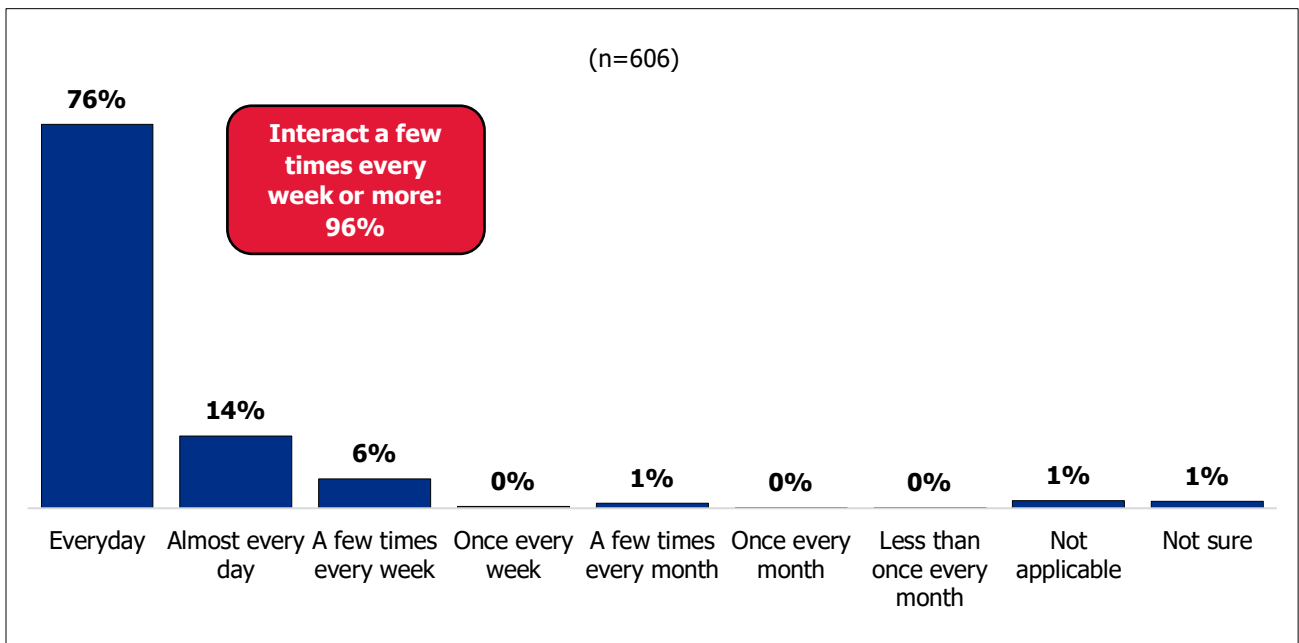
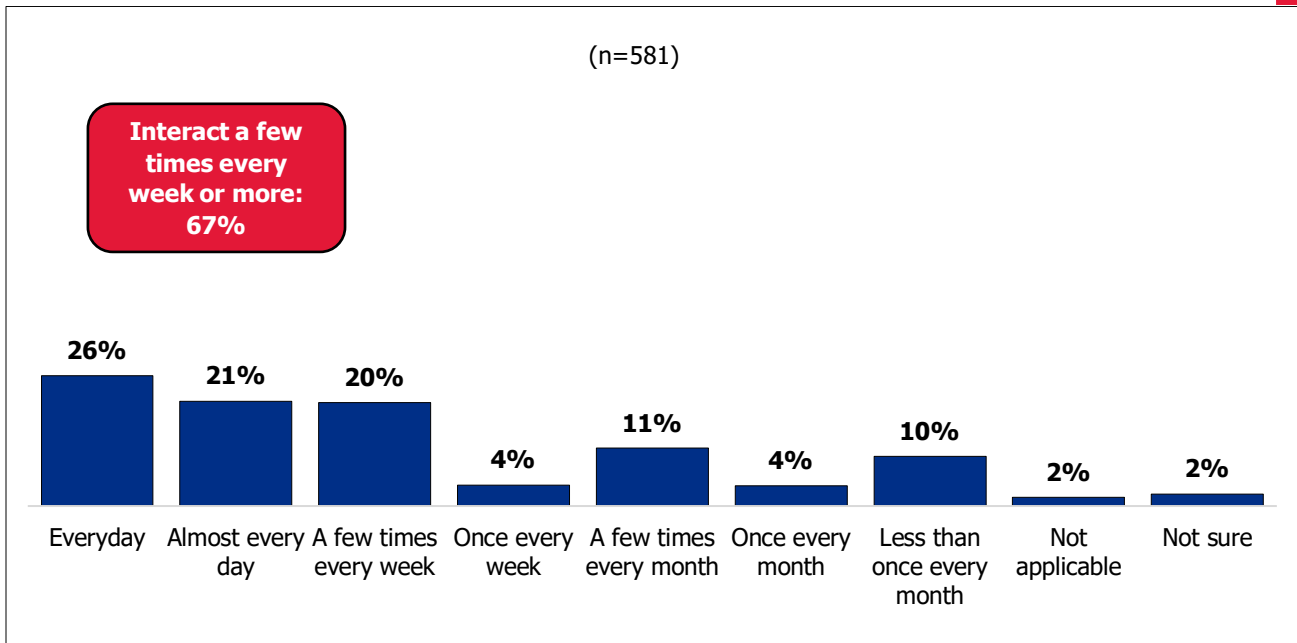


Figure 2. Frequency Interacting with LEP Customers

Four Factor Analysis: Factor 2



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

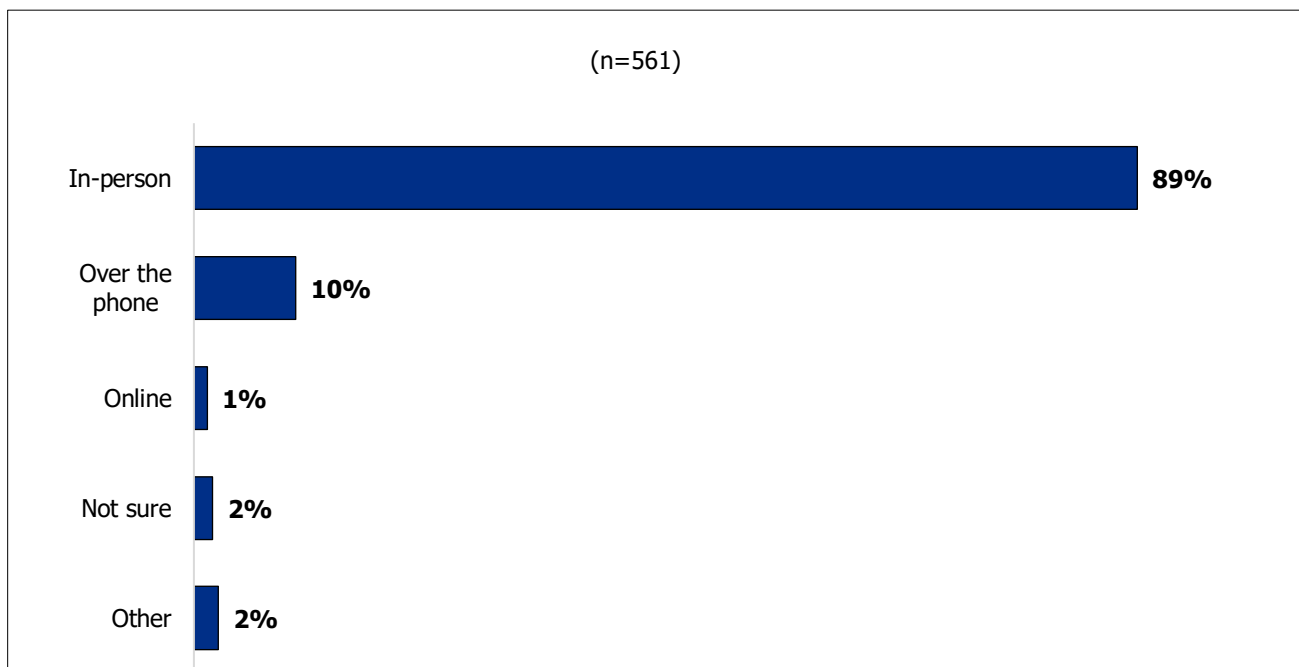
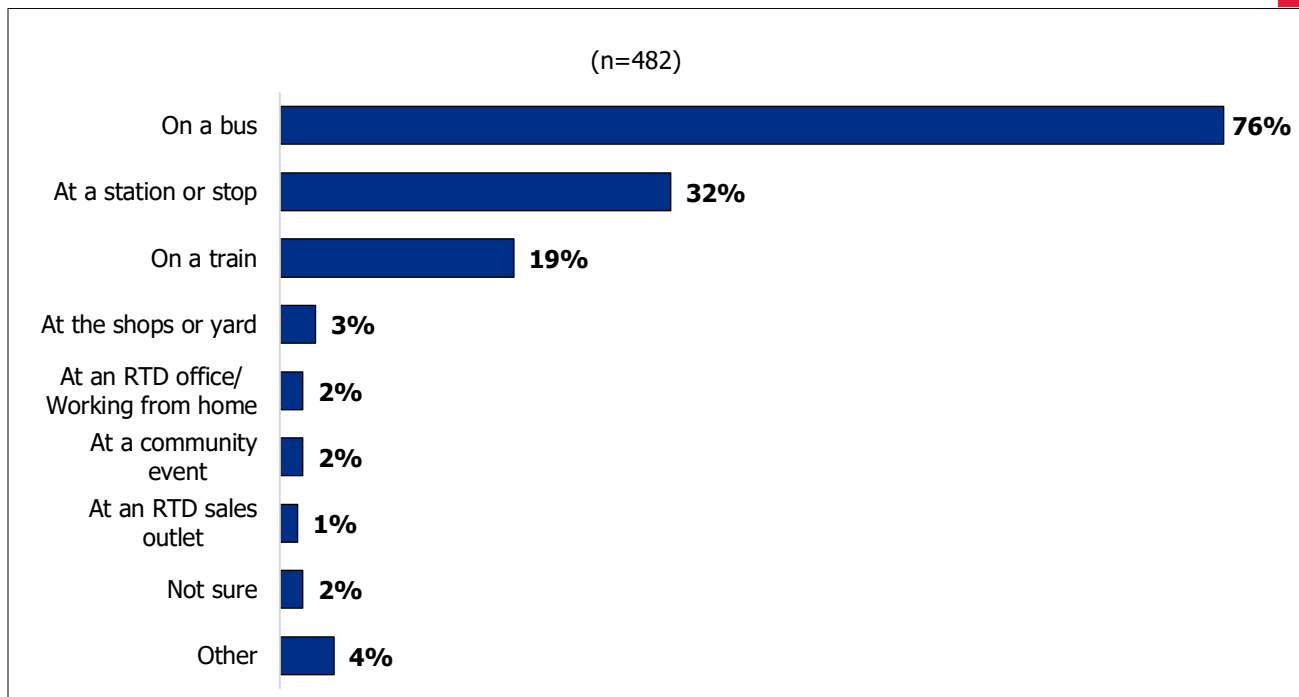


Figure 4. Where Employees Typically Interact with LEP Customers

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

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.

Four Factor Analysis: Factor 2

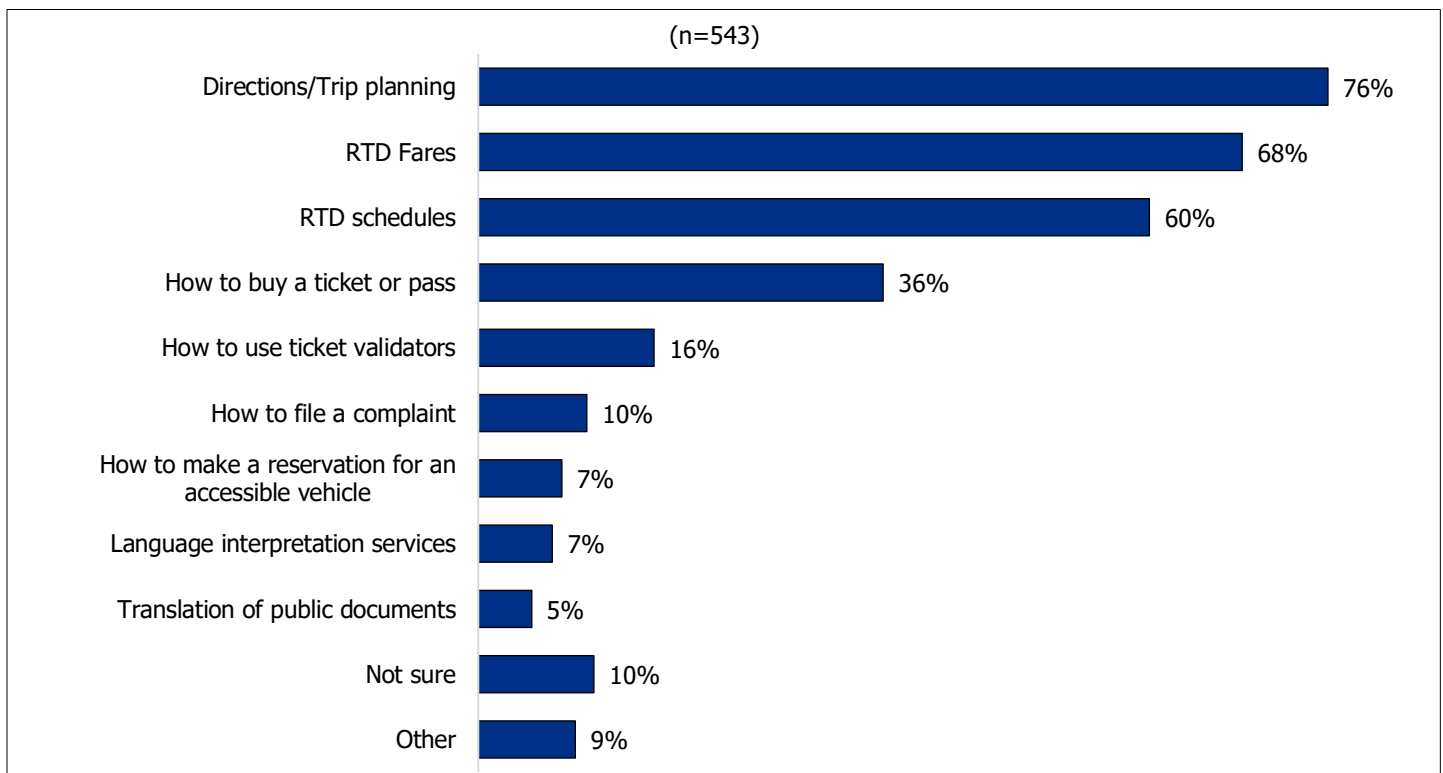
Figure 7. Train Lines with Frequent LEP Contact

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

LEP Customer Interactions

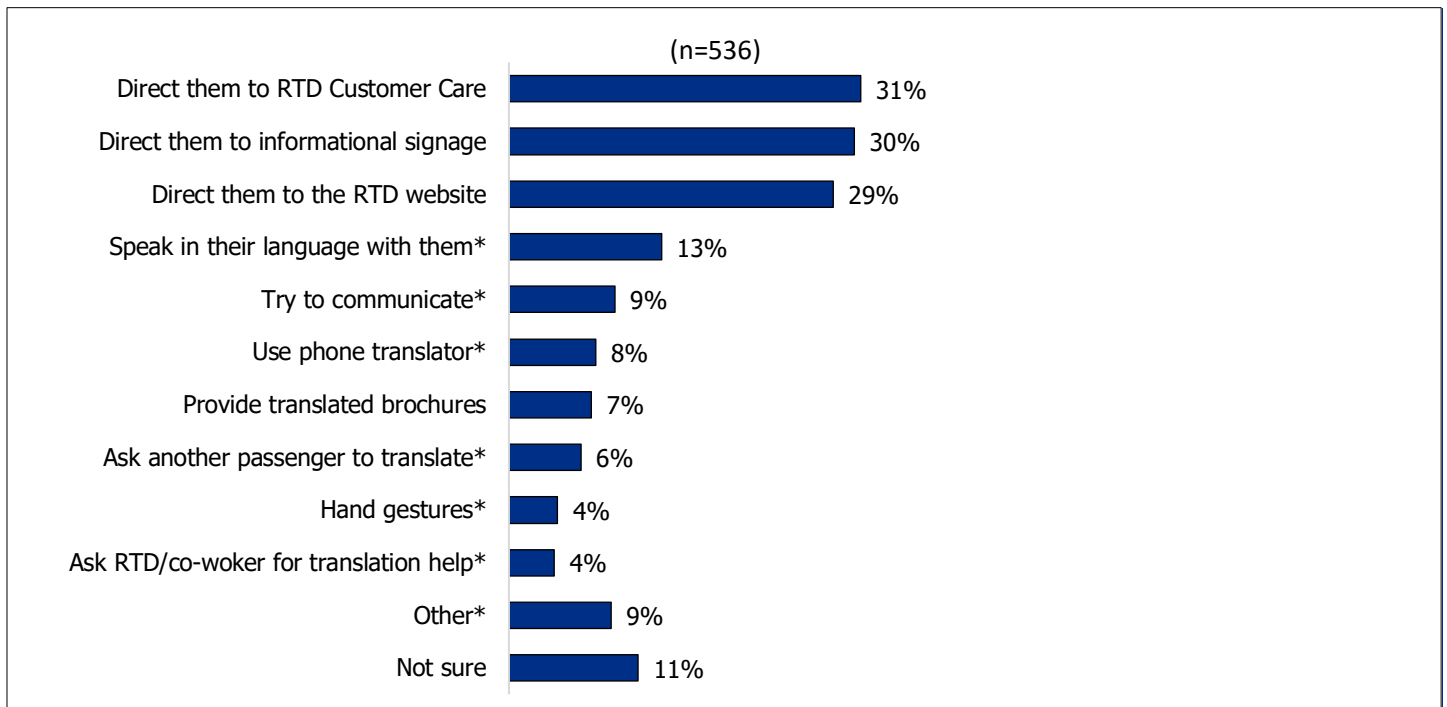
Respondents report most LEP customers ask questions about directions or trip planning, fares, schedules or how to buy a ticket. Figure 8 on the next page shows the breakdown of topics.

Figure 8. Topics LEP Customers Ask Questions About



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

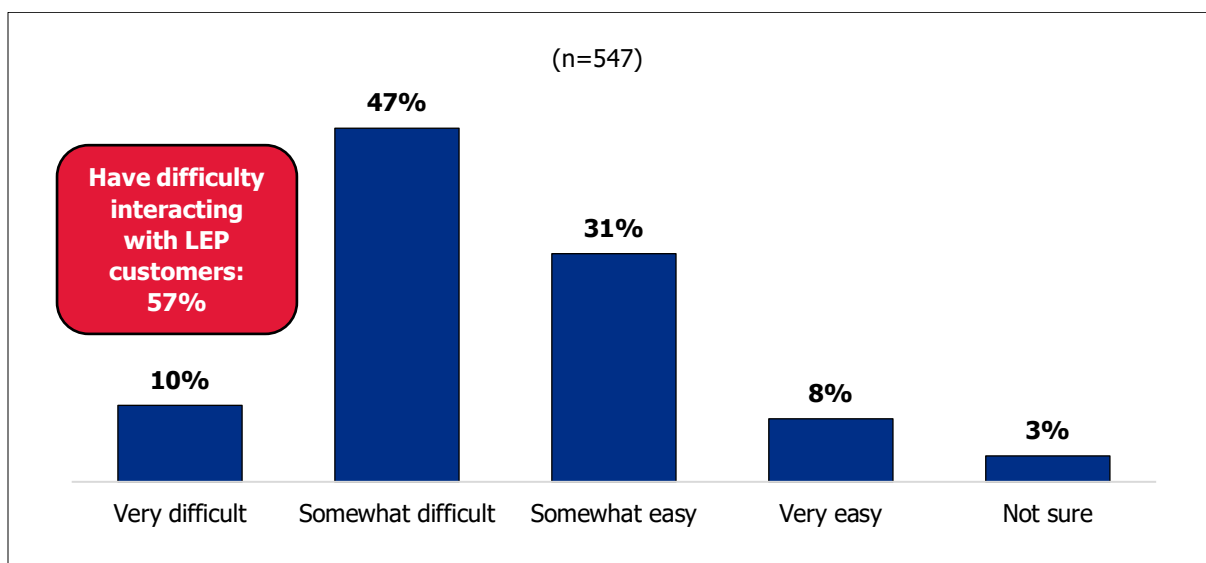


48% of respondents selected "Other (please specify)." RTD coded these responses and included them in Figure 9. All responses with an asterisk () are responses written in by respondents.

Difficulty Communicating with LEP Customers

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

Figure 10. Difficulty Communicating with LEP Customers

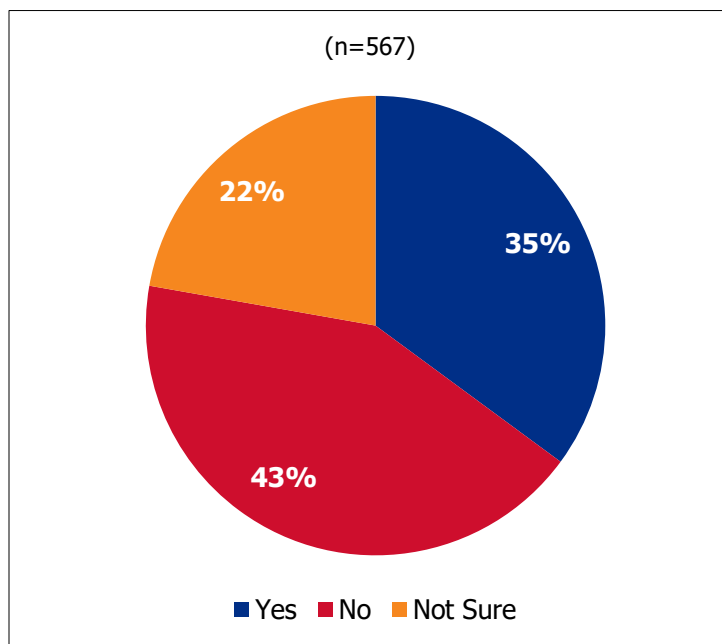


Four Factor Analysis: Factor 2

RTD Materials, Tools, and Services

Few respondents (35%) feel equipped to speak with LEP customers.

Figure 11. Feel Equipped to Communicate with LEP Customers



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

Four Factor Analysis: Factor 2

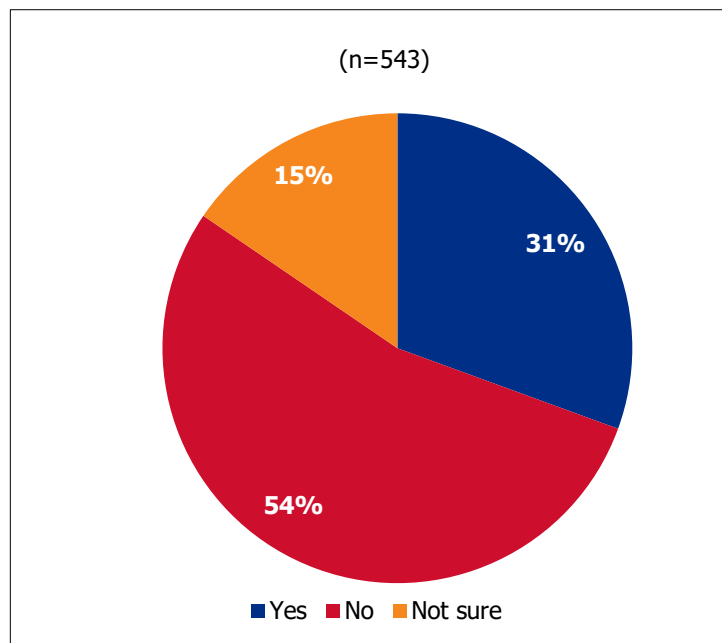
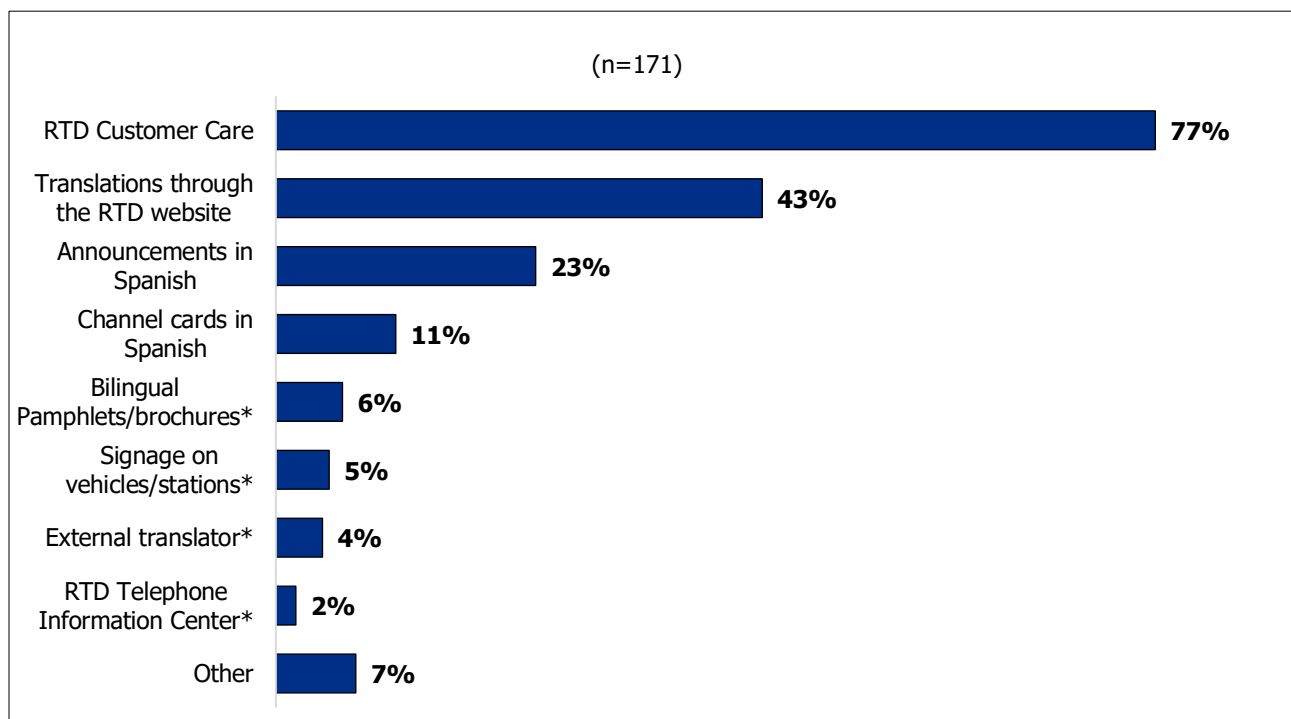


Figure 13. Materials, Services and Tools Employees Are Aware Of



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.

Four Factor Analysis: Factor 2

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

- 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

Four Factor Analysis: Factor 2

- 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.

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

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Figure 15. Speak Another Language Fluently Other Than English?

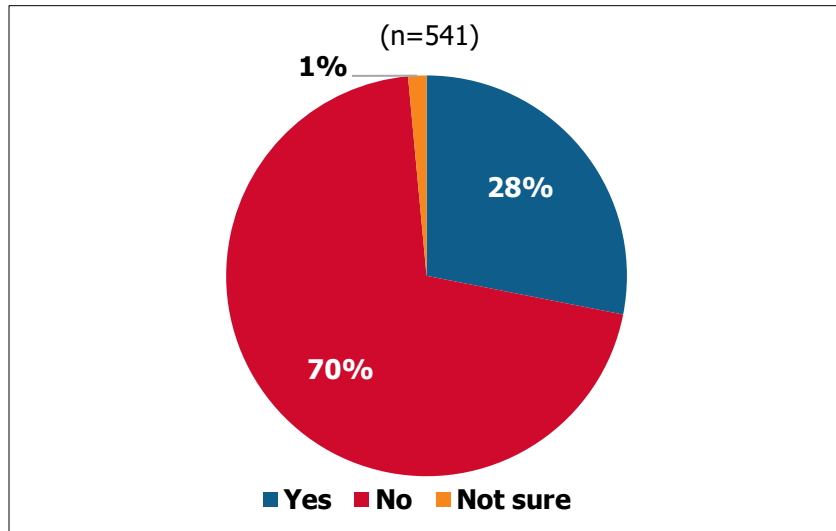
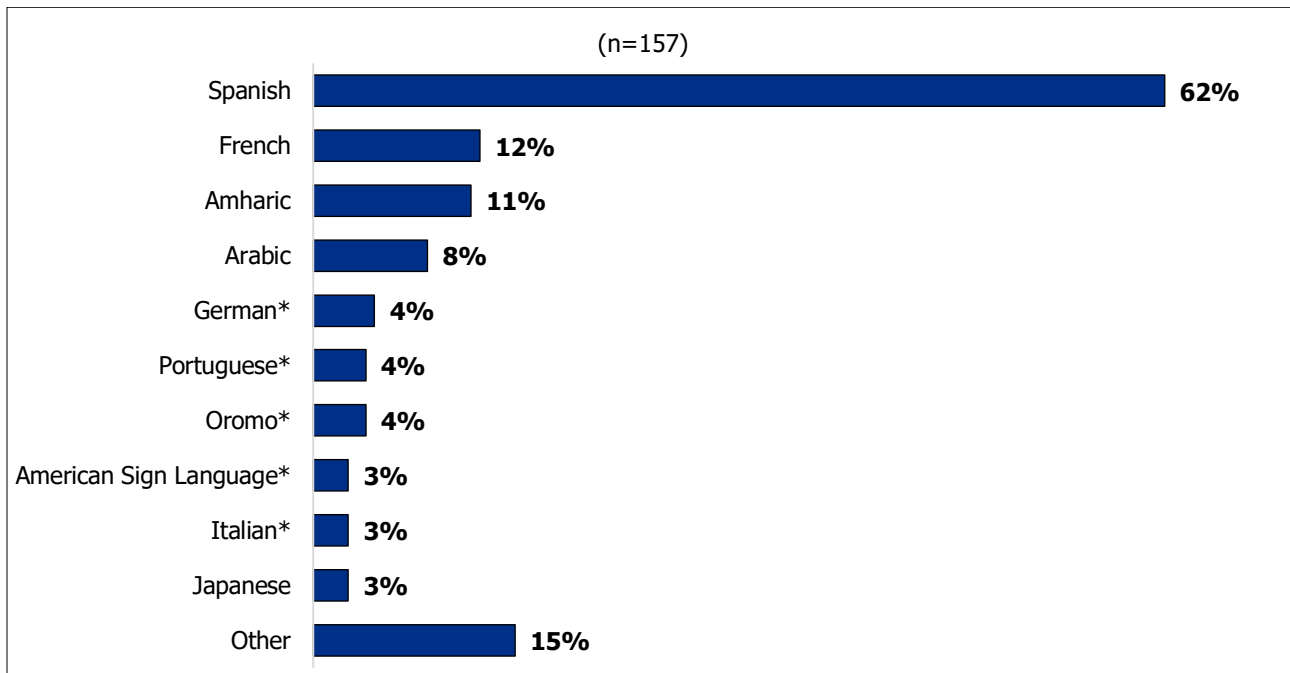


Figure 16. Languages Spoken Fluently Besides English



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%).

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

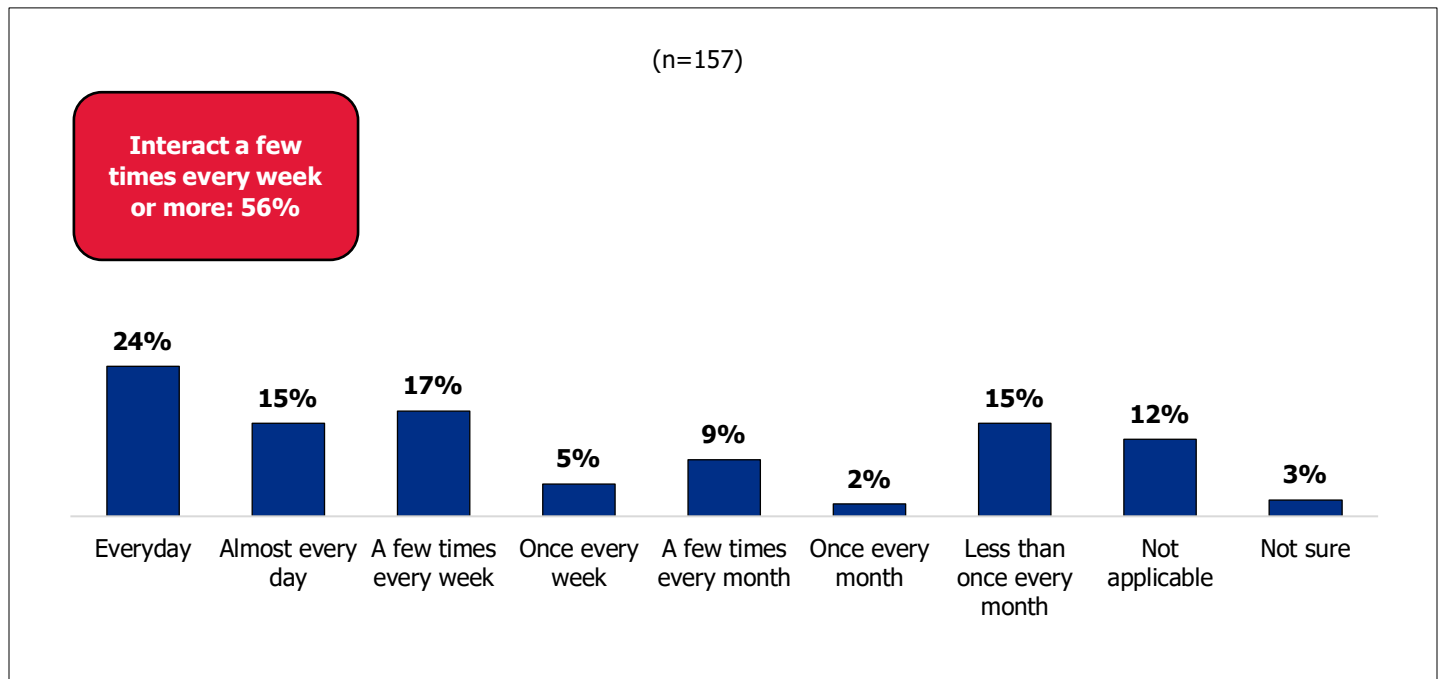
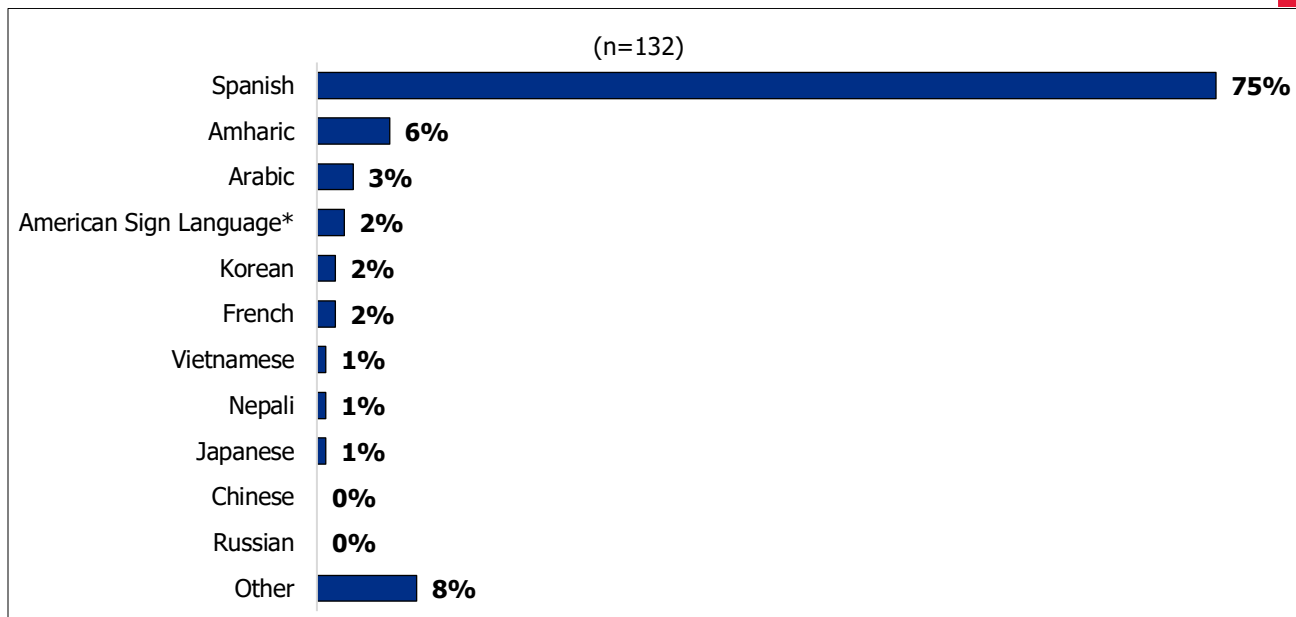


Figure 18. Language Spoken with Customers Most Often⁵

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.

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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

Four Factor Analysis: Factor 2

- 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

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

Four Factor Analysis: Factor 2

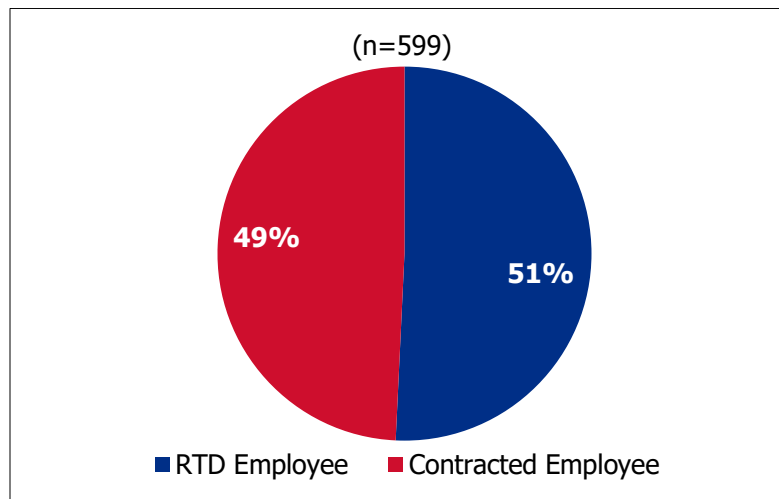


Figure 21. Contractor

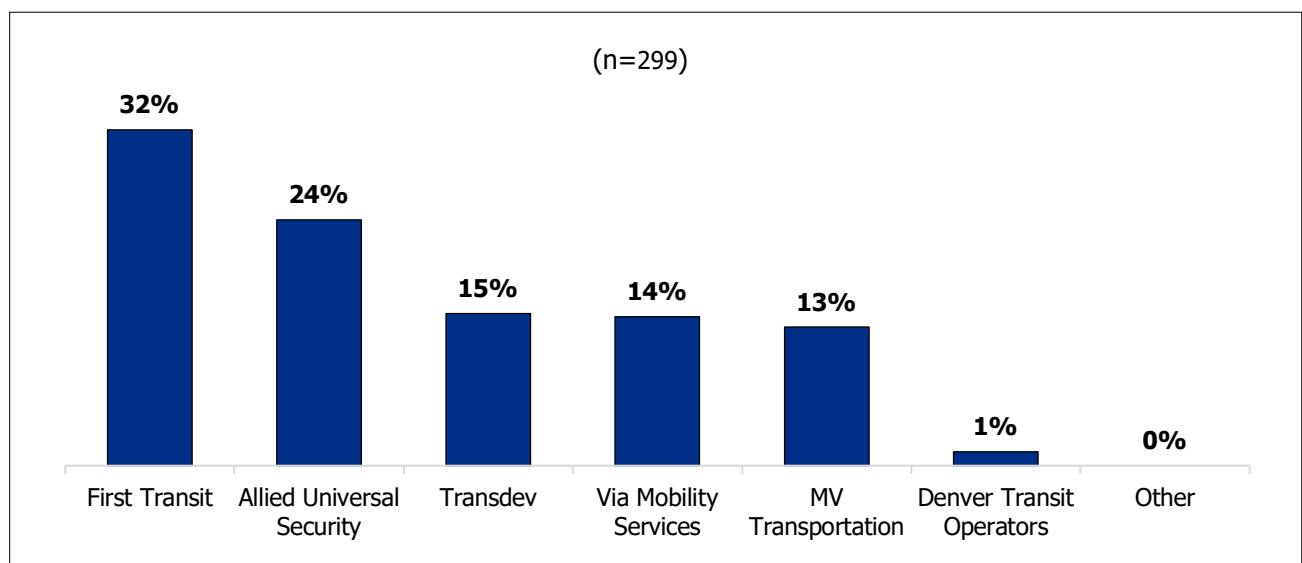


Figure 22. Department⁶

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

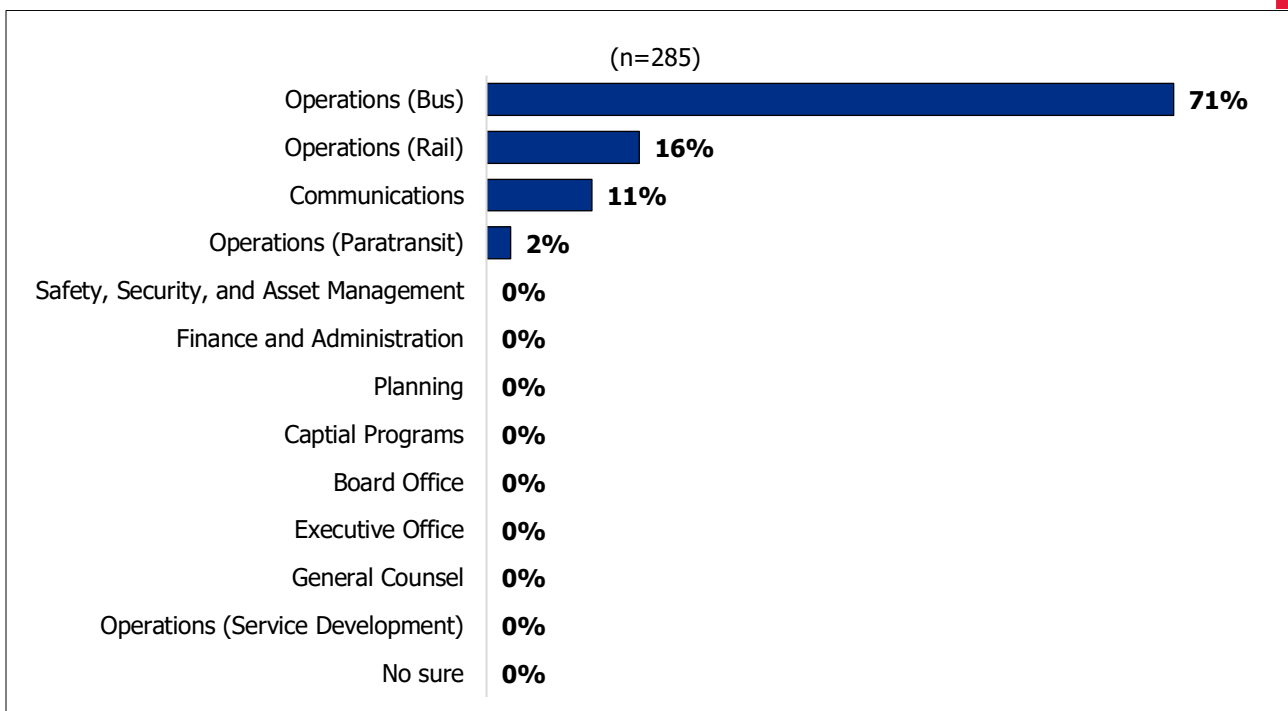
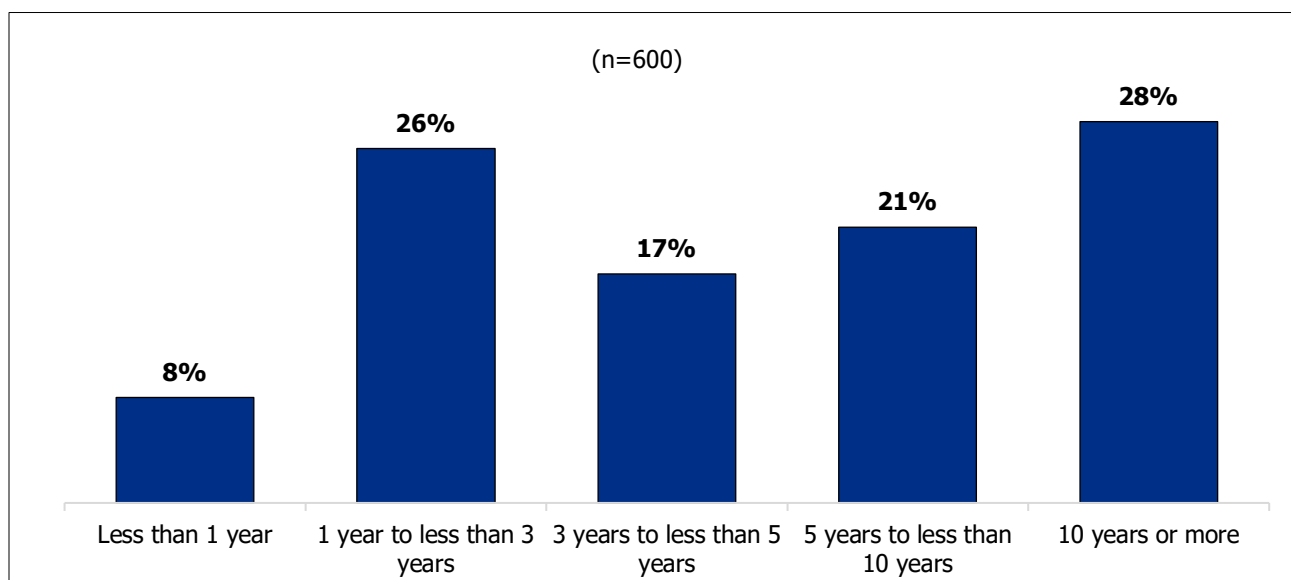


Figure 23. Tenure at RTD



Four Factor Analysis: Factor 2

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

Appendix

Regulatory Background

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., 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

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

Four Factor Analysis: Factor 2



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.

Survey Announcement Email



Four Factor Analysis: Factor 2



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



Four Factor Analysis: Factor 2



Survey Launch Email



Four Factor Analysis: Factor 2



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/employeeelap

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:
 - Determine the frequency with which frontline staff interact with customers who speak limited English.
 - 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/employeeelap.
- All other staff, please complete the survey by visiting this link: www.surveymonkey.com/r/employeeelap. 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/employeeelap.
- 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.**



Four Factor Analysis: Factor 2

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

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
Bellevue	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

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

Four Factor Analysis: Factor 2

3	5
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

8th & Coffman PnR	1
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

Four Factor Analysis: Factor 2

76	2
228	2
520	2
83D	2
Bellevue 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

Four Factor Analysis: Factor 2

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%

Four Factor Analysis: Factor 2

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 to 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/employeeelap.

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?

- | | | |
|---|---|---|
| <input type="radio"/> Allied Universal Security | <input type="radio"/> MV Transportation | <input type="radio"/> Other (please specify)
<hr/> |
| <input type="radio"/> Denver Transit Operators | <input type="radio"/> Transdev | |
| <input type="radio"/> First Transit | <input type="radio"/> Via Mobility Services | |
| | | |

3. In which RTD department do you currently work?

- | | | |
|--|--|--|
| <input type="radio"/> Bus Operations | <input type="radio"/> Finance and Administration | <input type="radio"/> Rail Operations |
| <input type="radio"/> Capital Programs | <input type="radio"/> Operations (Paratransit and Service Development) | <input type="radio"/> Safety, Security, and Asset Management |
| <input type="radio"/> Communications | | <input type="radio"/> Not sure |
| <input type="radio"/> Executive Office | | |



Four Factor Analysis: Factor 2

☐ Planning

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?

- | | |
|---|--|
| <input type="radio"/> Everyday | <input type="radio"/> Once every month |
| <input type="radio"/> Almost every day | <input type="radio"/> Less than once every month |
| <input type="radio"/> A few times every week | <input type="radio"/> Not applicable - I don't interact with customers (SKIP TO QUESTION 20) |
| <input type="radio"/> Once every week | <input type="radio"/> Not sure (SKIP TO QUESTION 20) |
| <input type="radio"/> A few times every month | |

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

- | | |
|---|--|
| <input type="radio"/> Everyday | <input type="radio"/> Once every month |
| <input type="radio"/> Almost every day | <input type="radio"/> Less than once every month |
| <input type="radio"/> A few times every week | <input type="radio"/> Not applicable - I don't interact with customers who speak limited or no English (SKIP TO QUESTION 20) |
| <input type="radio"/> Once every week | <input type="radio"/> Not sure (SKIP TO QUESTION 20) |
| <input type="radio"/> A few times every month | |

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
- ☐ Direct them to the RTD website
- ☐ Provide translated brochures
- ☐ Not sure
- ☐ Direct them to informational signage (i.e., diagrams, maps, etc.)
- ☐ 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 (SKIP TO QUESTION 15) ☐ Not sure (SKIP TO QUESTION 15)

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 (SKIP TO QUESTION 20) ☐ Not sure (SKIP TO QUESTION 20)

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

- | | | | |
|-------------------------------------|----------------------------------|----------------------------------|--|
| <input type="checkbox"/> Spanish | <input type="checkbox"/> Korean | <input type="checkbox"/> Amharic | <input type="checkbox"/> Japanese |
| <input type="checkbox"/> Vietnamese | <input type="checkbox"/> Russian | <input type="checkbox"/> Arabic | <input type="checkbox"/> Other (please specify): |
| <input type="checkbox"/> Chinese | <input type="checkbox"/> Nepali | <input type="checkbox"/> 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

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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.

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.

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

² For a complete list of CBOs, please see Appendix.

Four Factor Analysis: Factor 3

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%).
- **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."

³ To view the count of responses per language, please see *Response Rates per Survey Translation* in the Appendix.

Four Factor Analysis: Factor 3

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

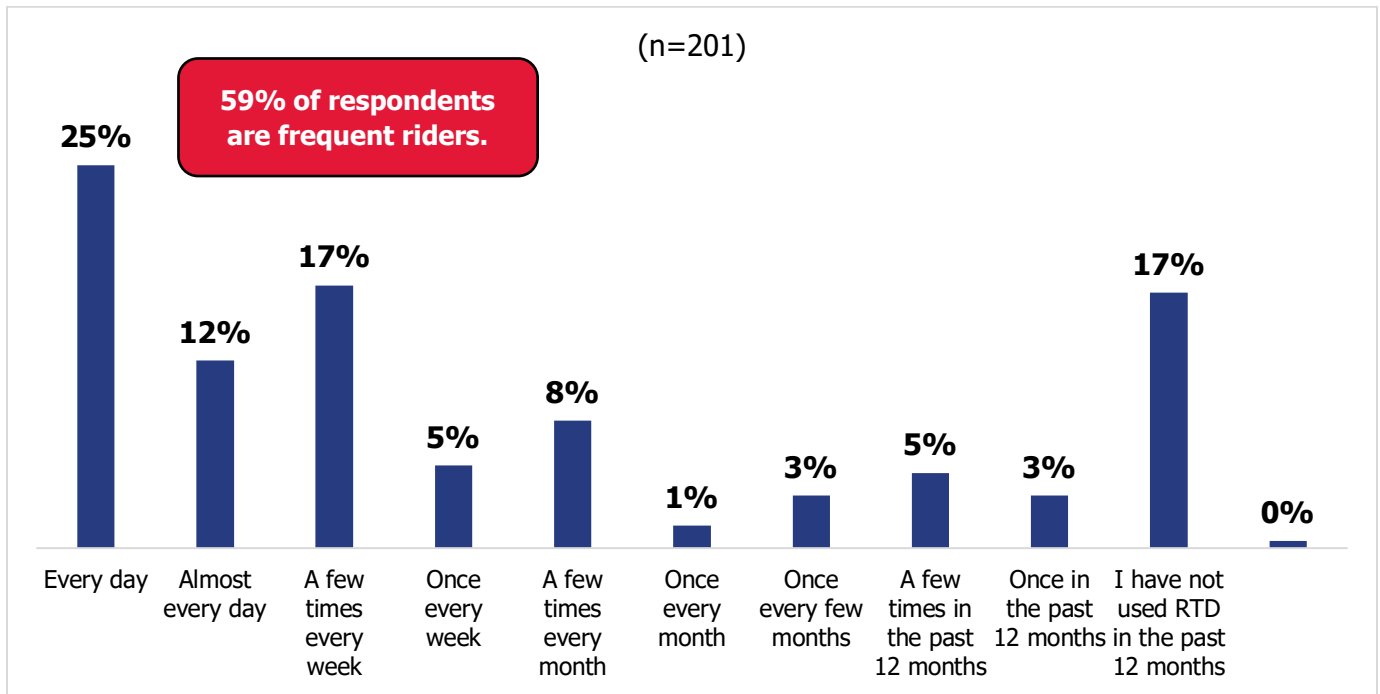
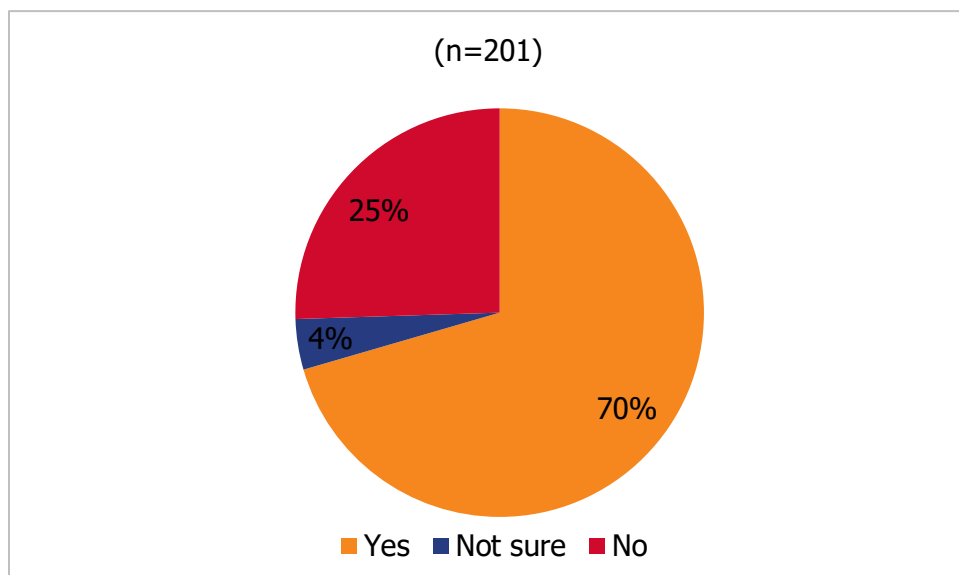
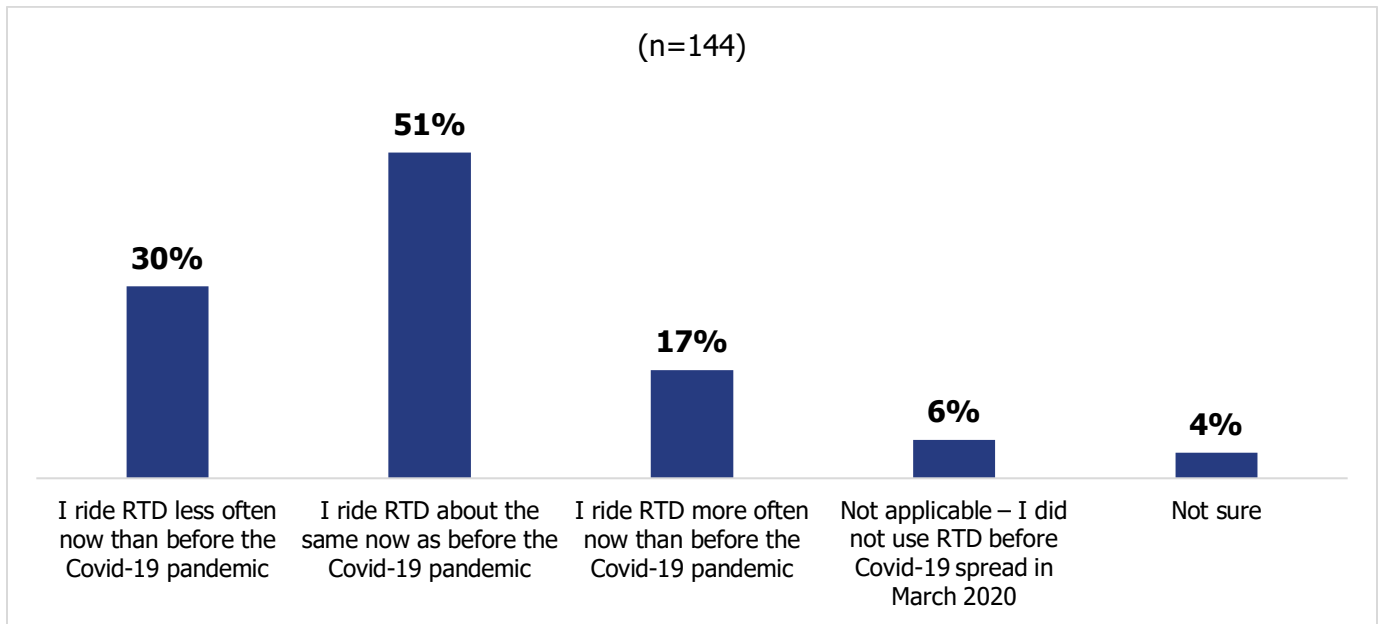


Figure 2. Used RTD Prior to COVID-19?



Four Factor Analysis: Factor 3

Figure 3. Change in Ridership Due to COVID-19

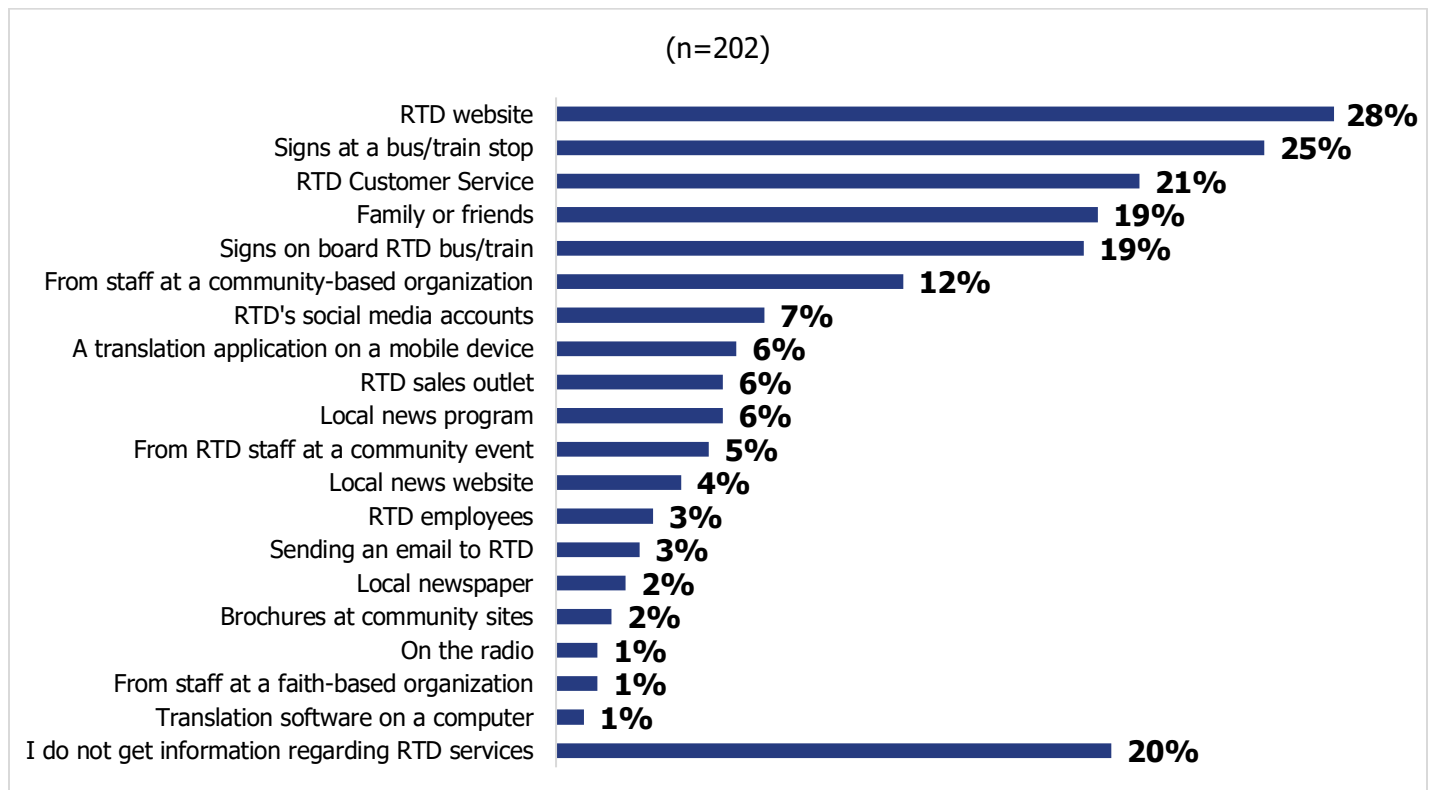


RTD Information

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

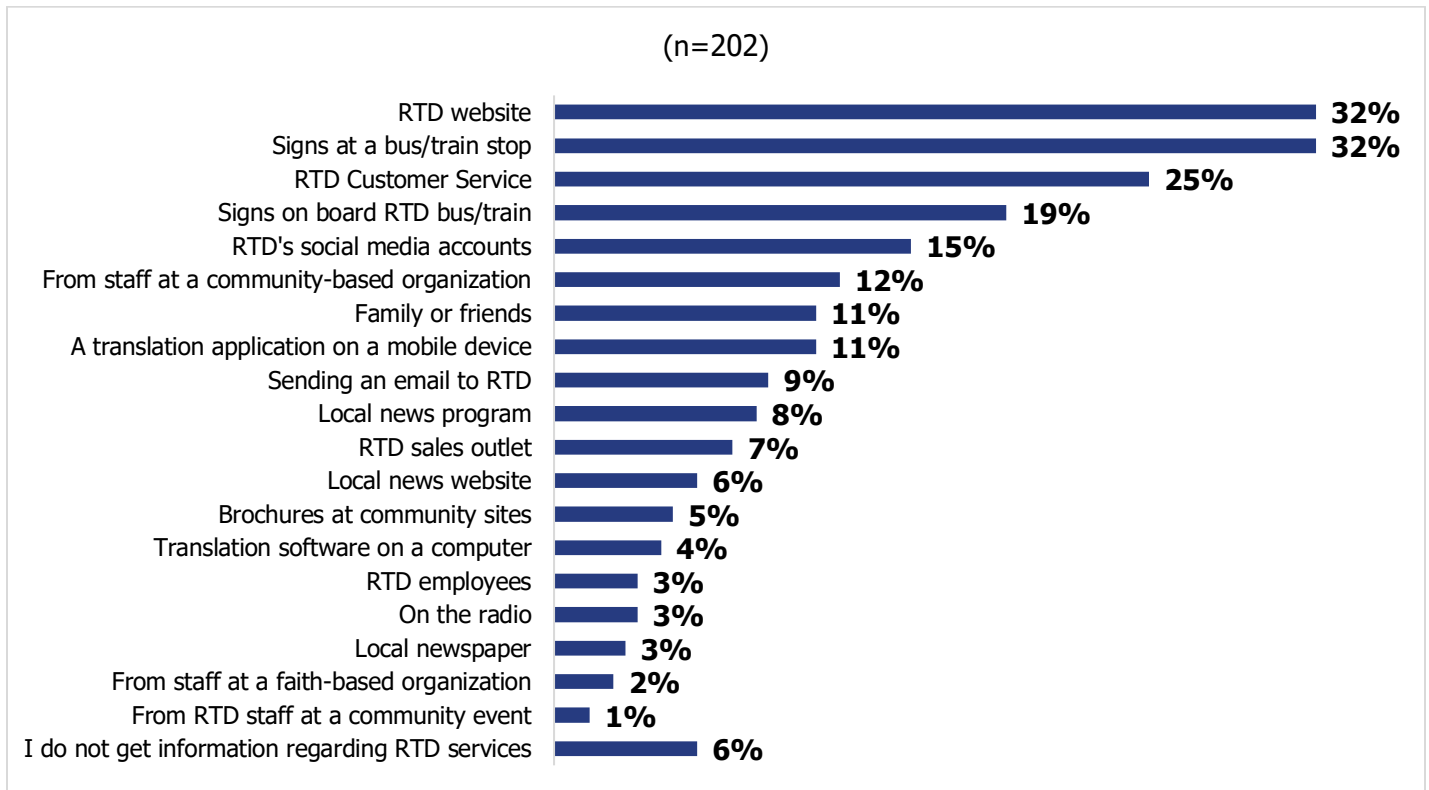
Figure 4. How LEP Customers Get Information about RTD



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

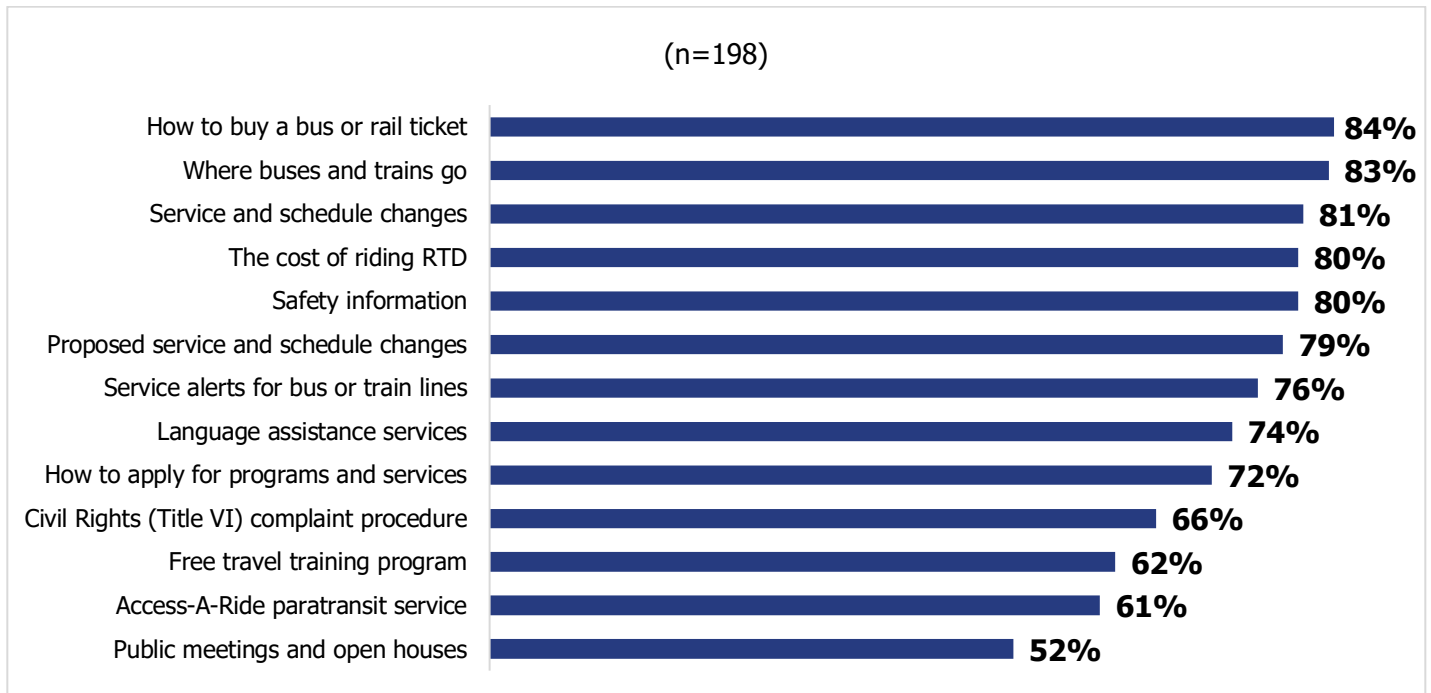


Perceptions of RTD Language Services

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.

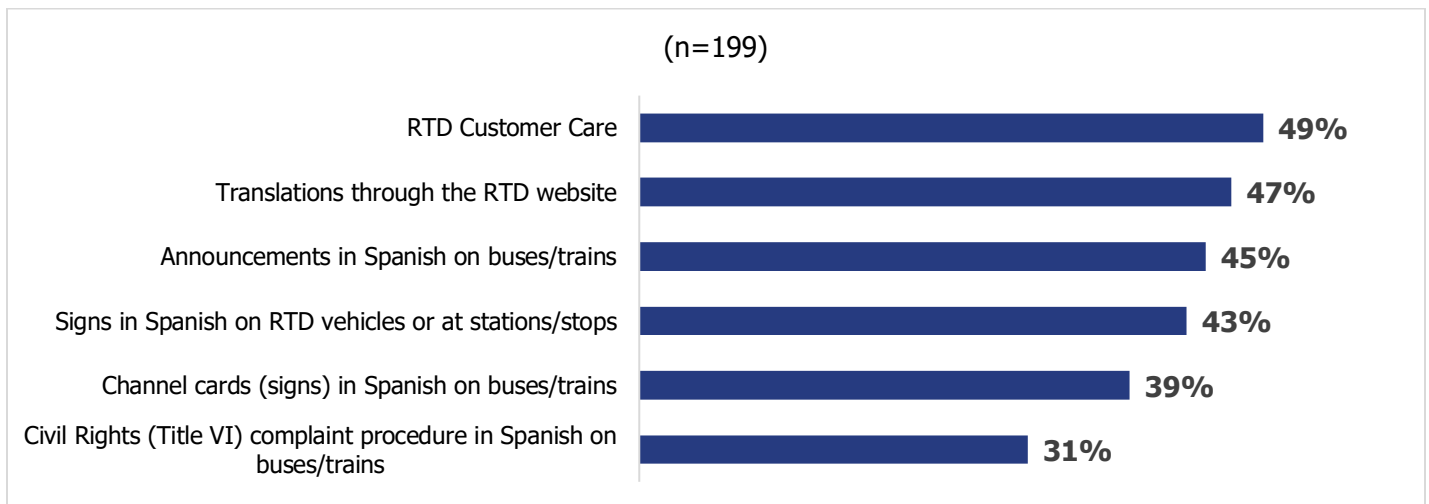
Four Factor Analysis: Factor 3

Figure 6. Importance of Having Translations Available



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



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?

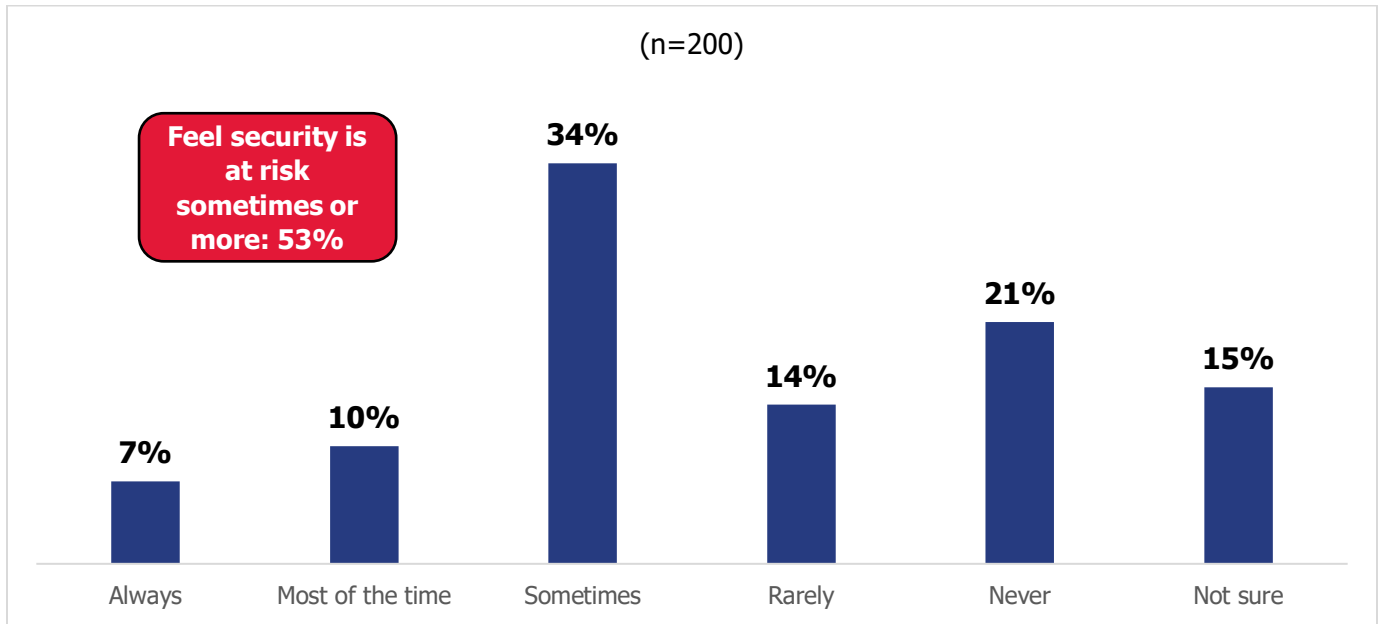
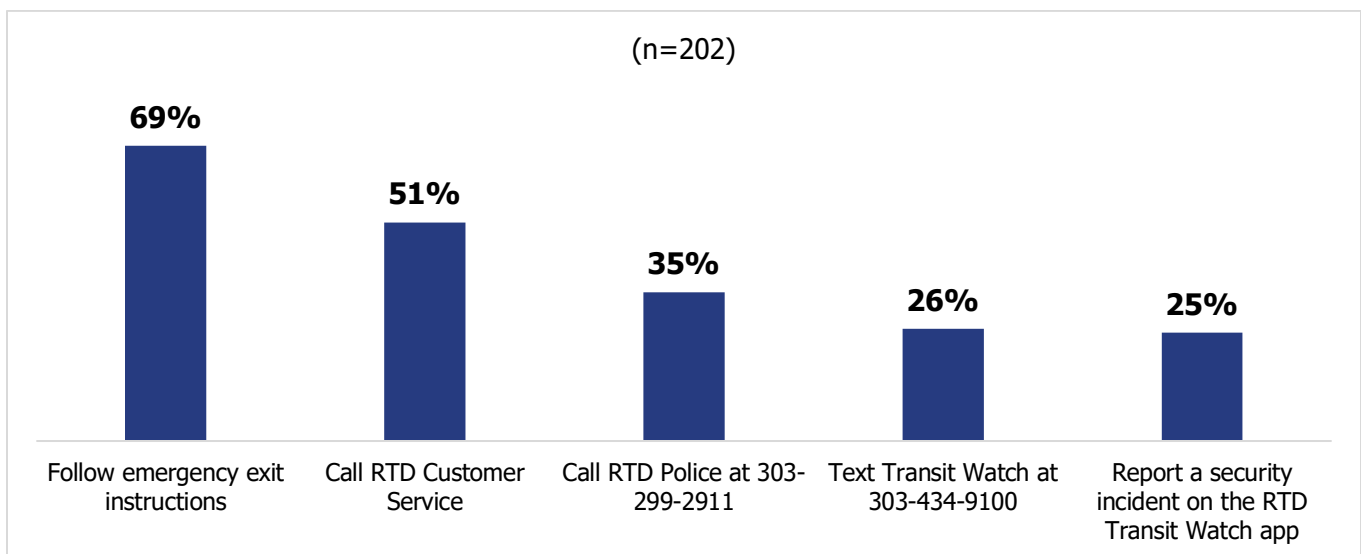


Figure 9 shows the percent of respondents that know how to do the following activities during an emergency. Most respondents (69%) know how to follow emergency exit instructions or call RTD Customer Service (51%); fewer know how to call RTD Police (35%), text Transit Watch (26%), or report an incident on the Transit Watch app (25%).

Figure 9. Know What to Do During an Emergency



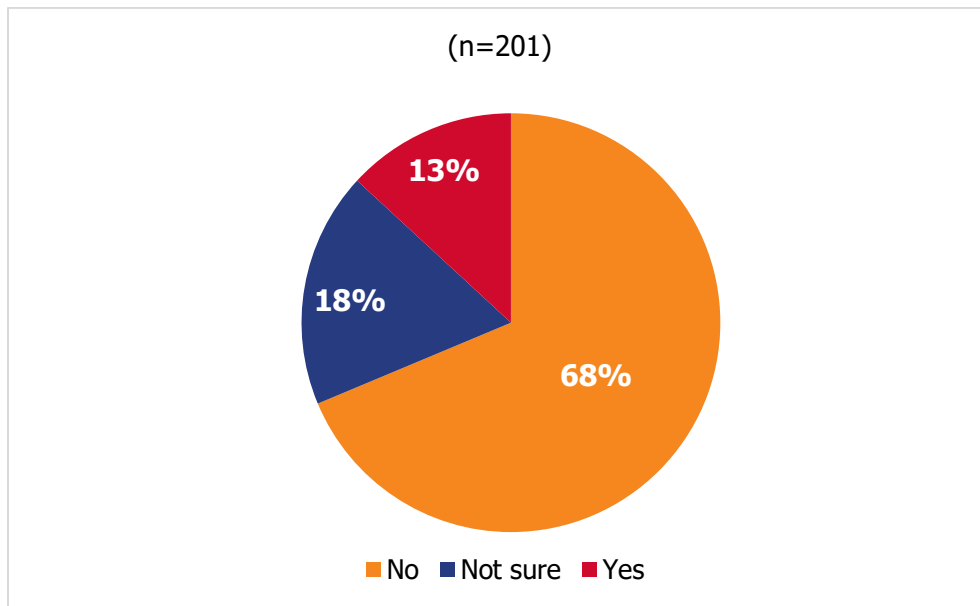
Four Factor Analysis: Factor 3

Discount Pass Usage

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

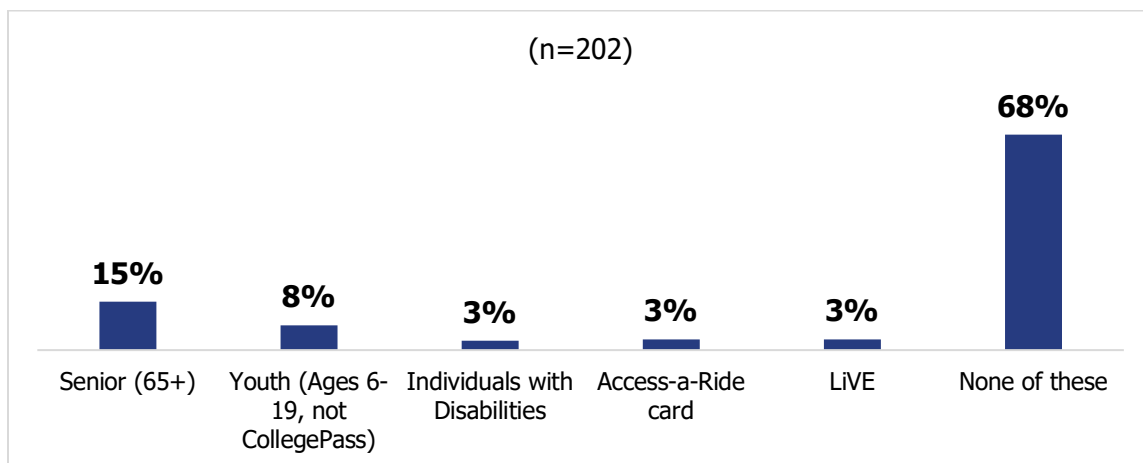
RTD asked respondents 3 follow-up questions regarding current enrollment in the LiVE program, knowledge of the eligibility requirements for the LiVE program, and knowledge of how to register for the LiVE program. The analysis of these questions is excluded from the report due to low base sizes (n=16-25).

Figure 10. Aware of LiVE Program?



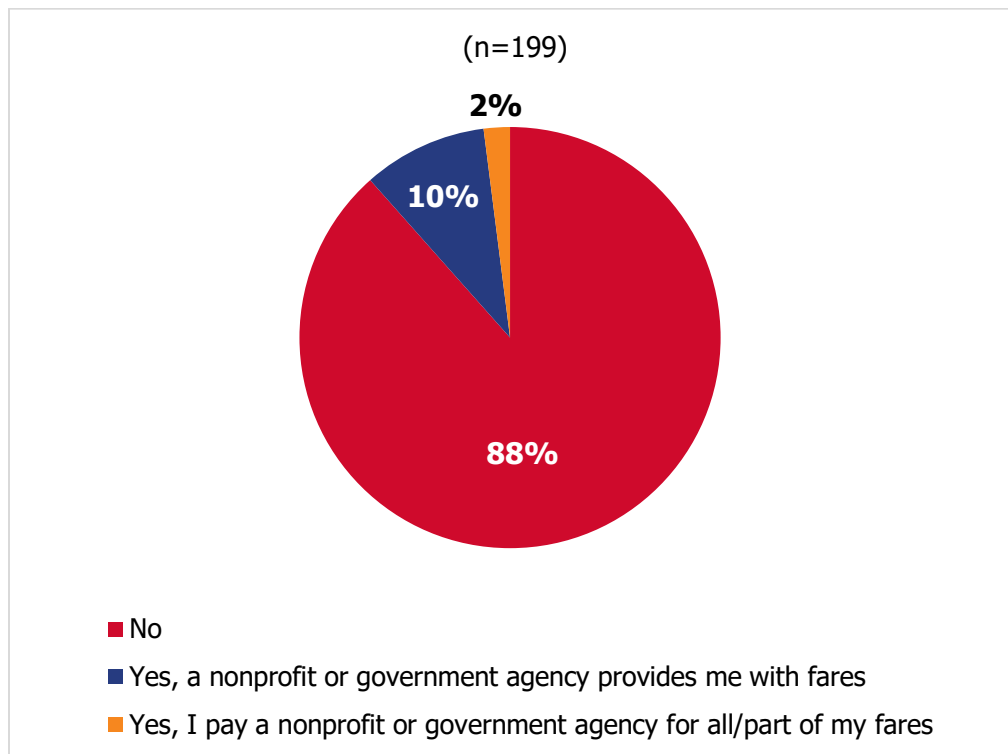
Most respondents (68%) do not use discount fare products from RTD. Of those using a discount pass, the Senior Pass is the most common discount pass used (15%) followed by the Youth Pass (8%). 1 in 10 respondents receive part of or all their fares through a non-profit or government agency.

Figure 11. Discount Pass Types Used



Four Factor Analysis: Factor 3

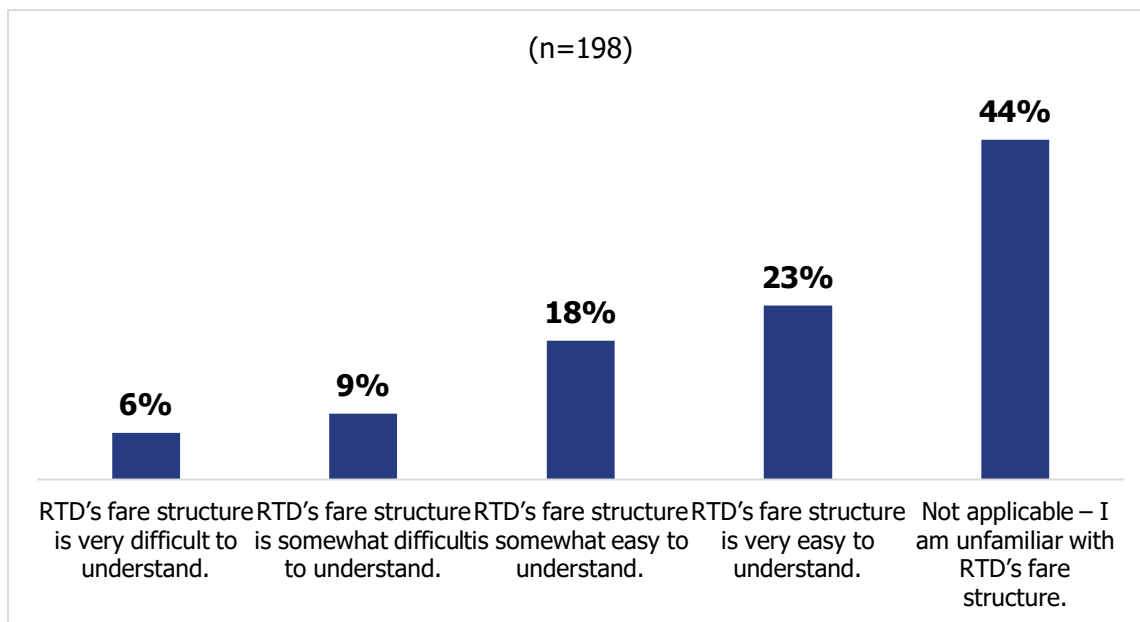
Figure 12. Receive Fares through RTD's Nonprofit Reduced Fare Program?



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



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

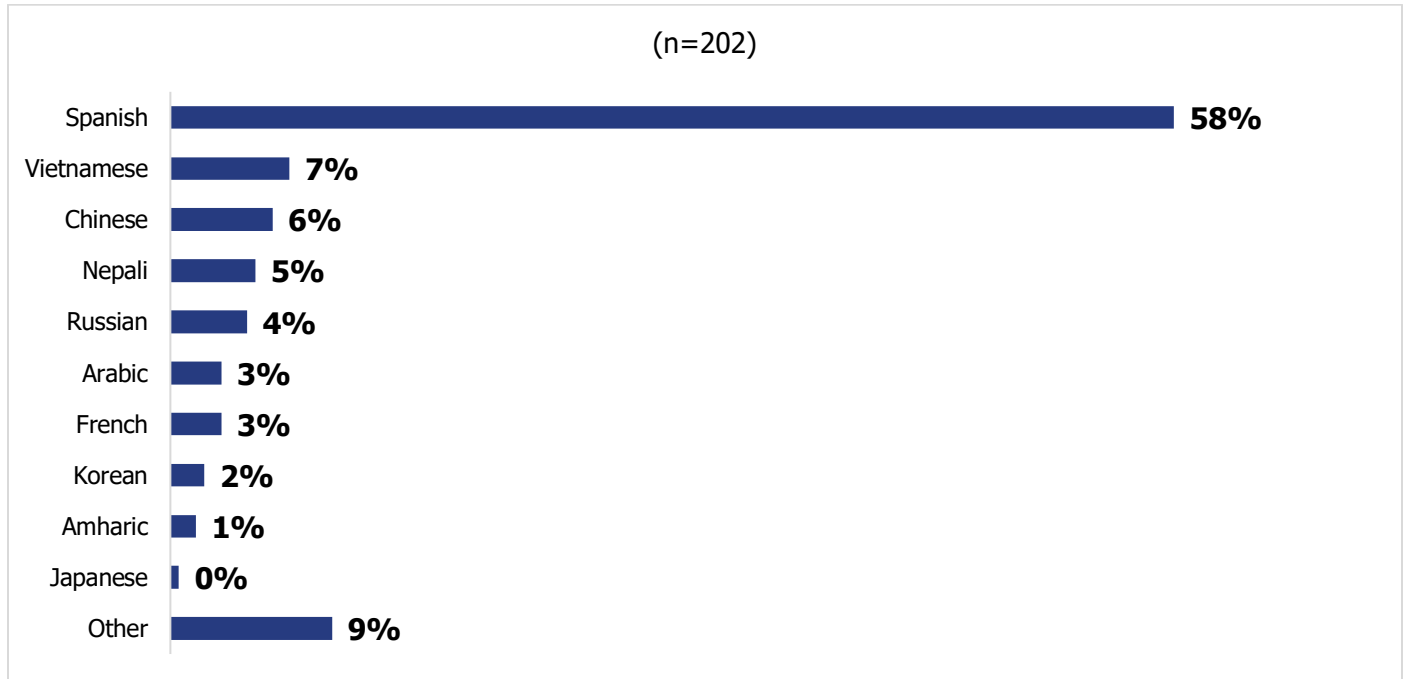
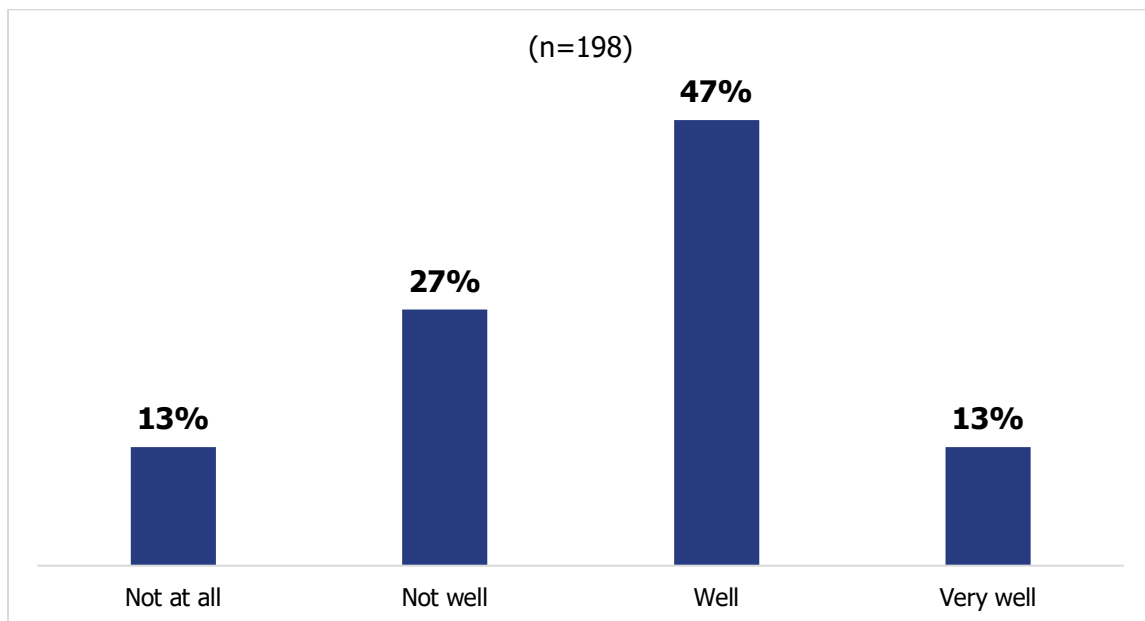


Figure 16. How Well Do You Read English?



Four Factor Analysis: Factor 3

Figure 17. How Well Do You Write English?

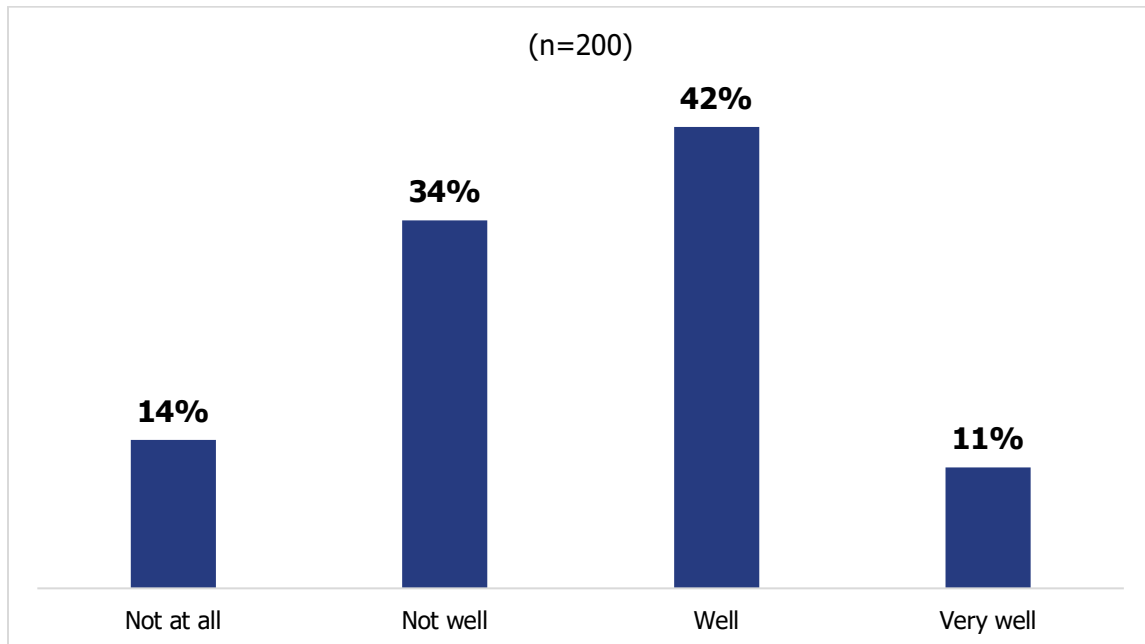
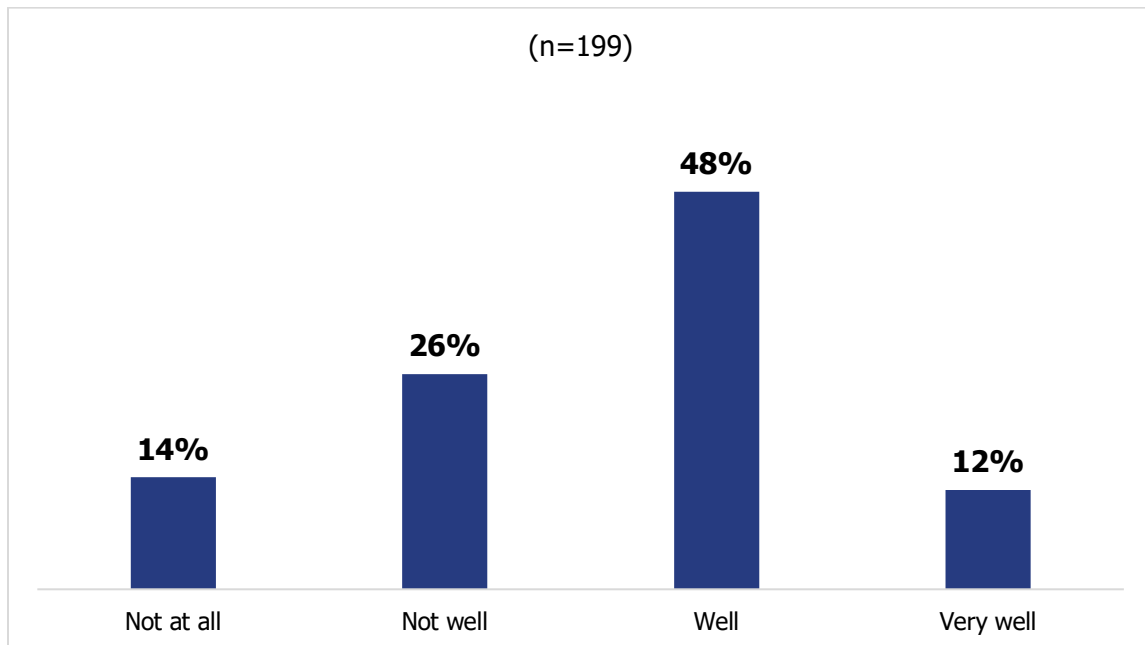


Figure 18. How Well Do You Understand English?



Four Factor Analysis: Factor 3

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

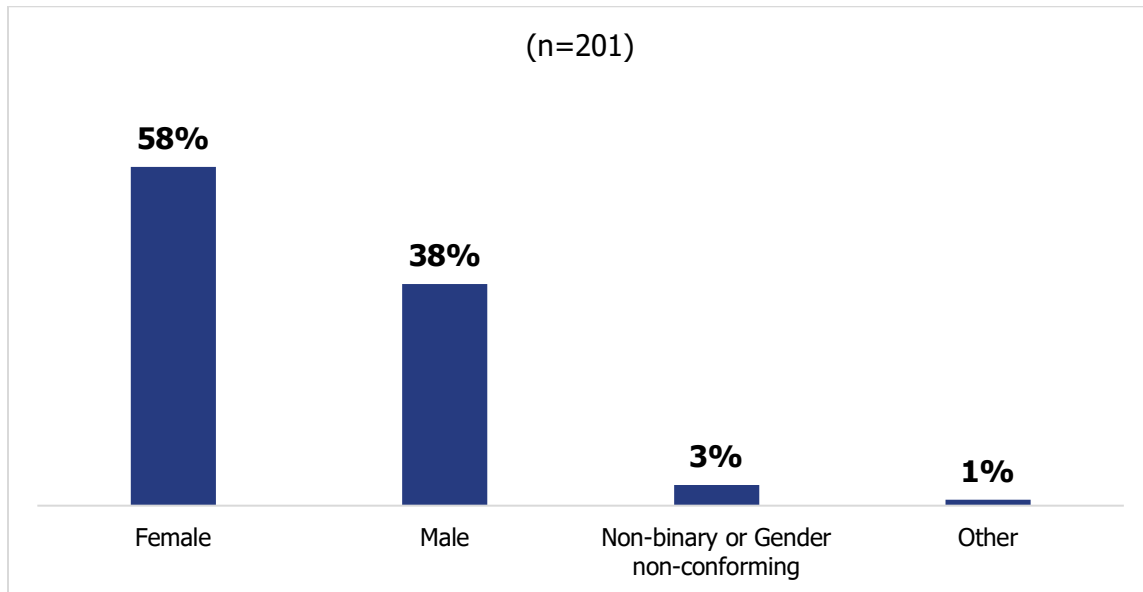
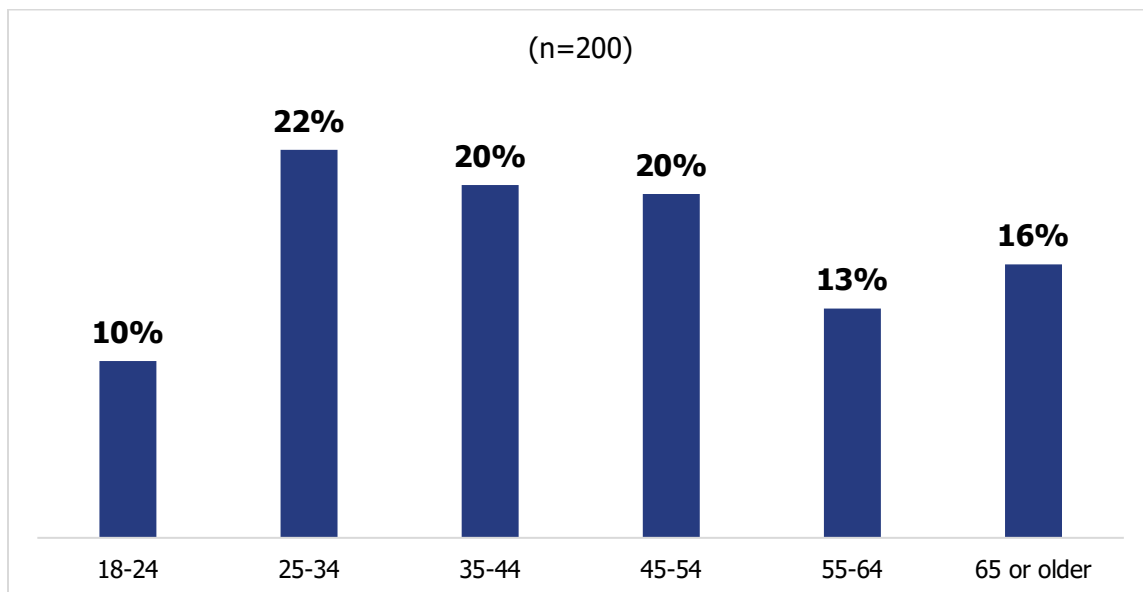


Figure 20. Age



Four Factor Analysis: Factor 3

Figure 21. Hispanic, Latino, or Spanish Origin?

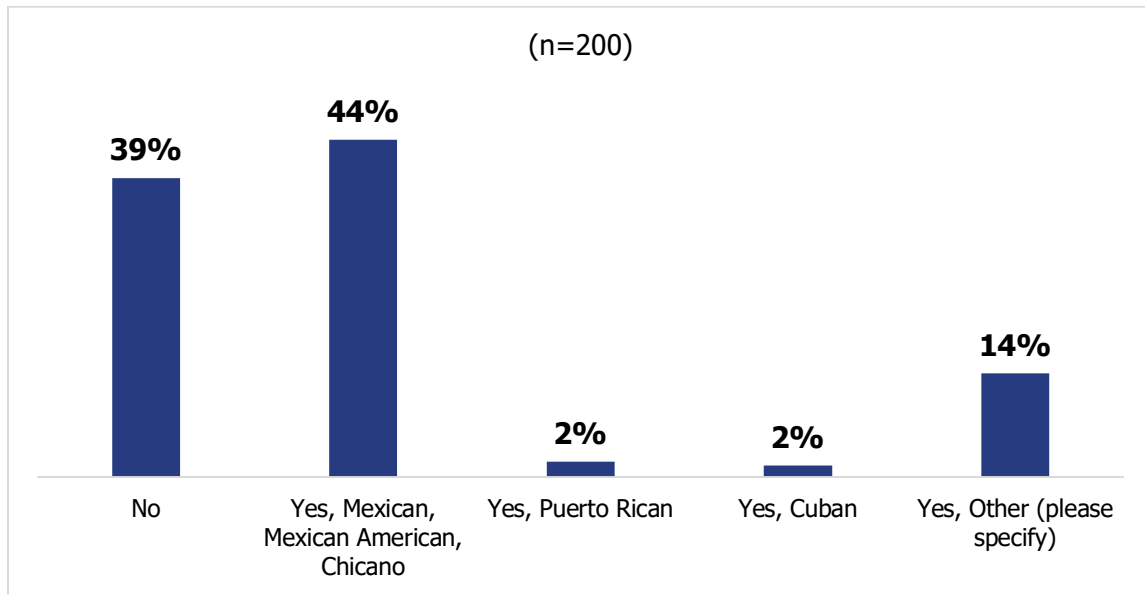
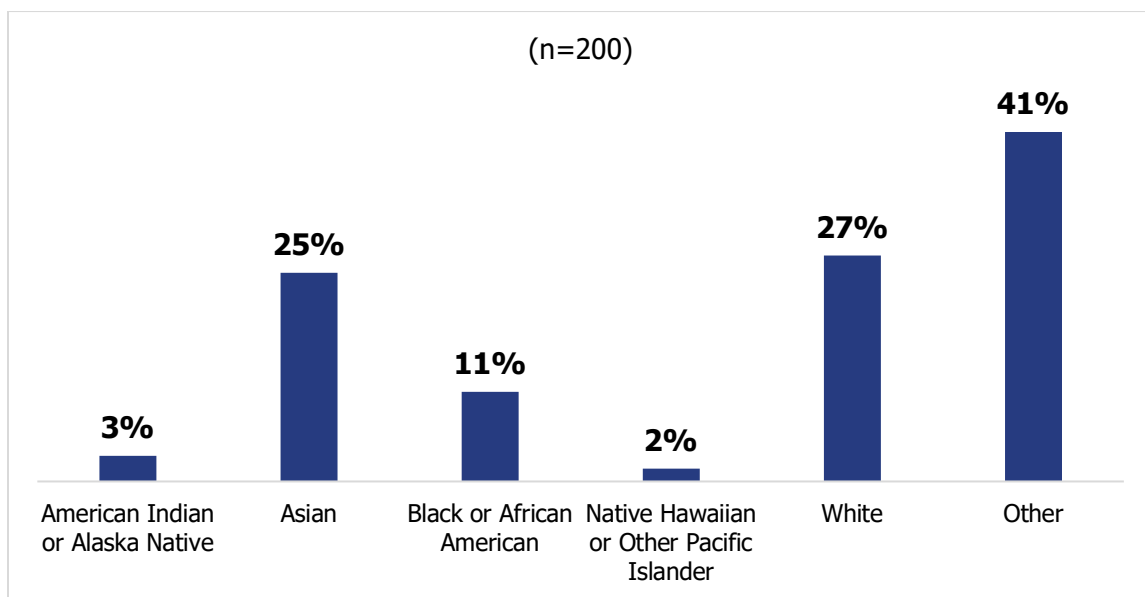


Figure 22. Ethnicity



Four Factor Analysis: Factor 3



Figure 23. Low Income?

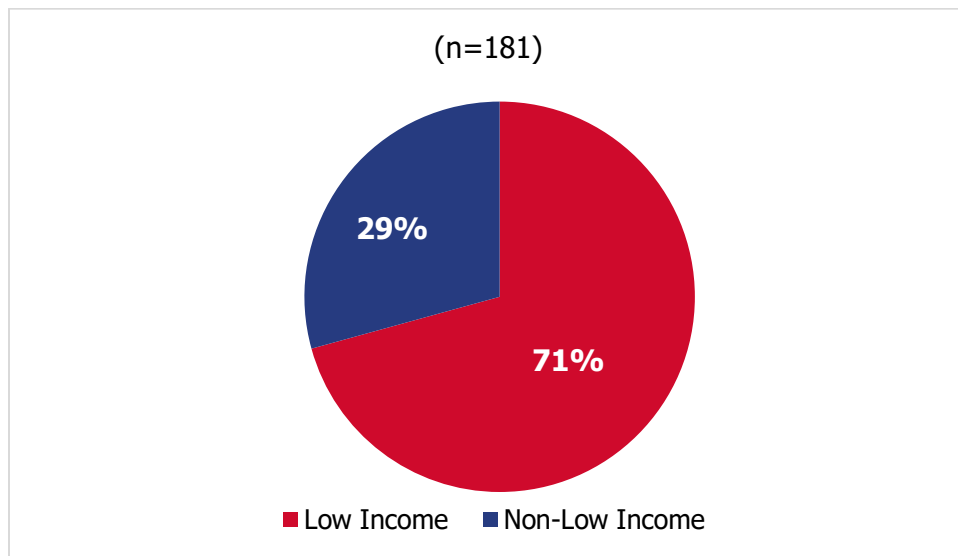


Figure 24. Have a Car in Household?

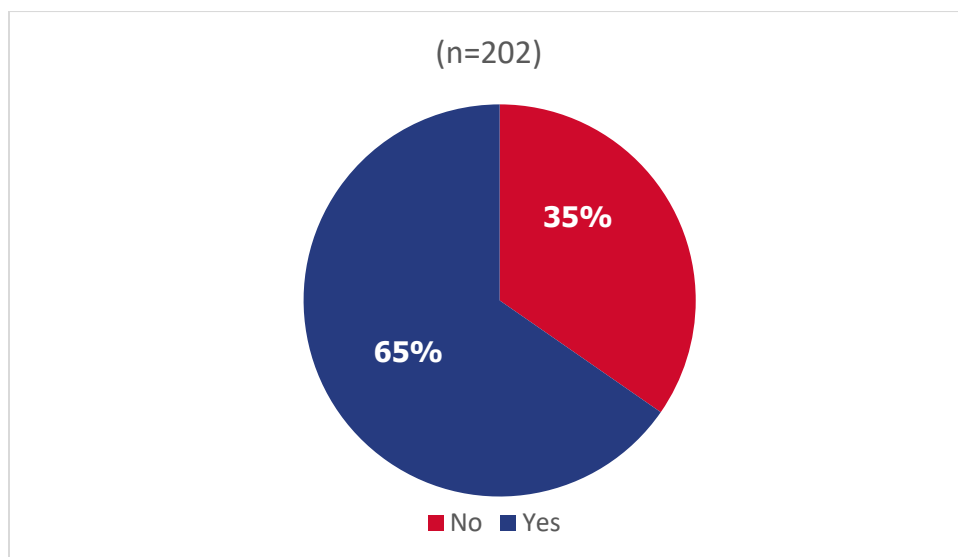
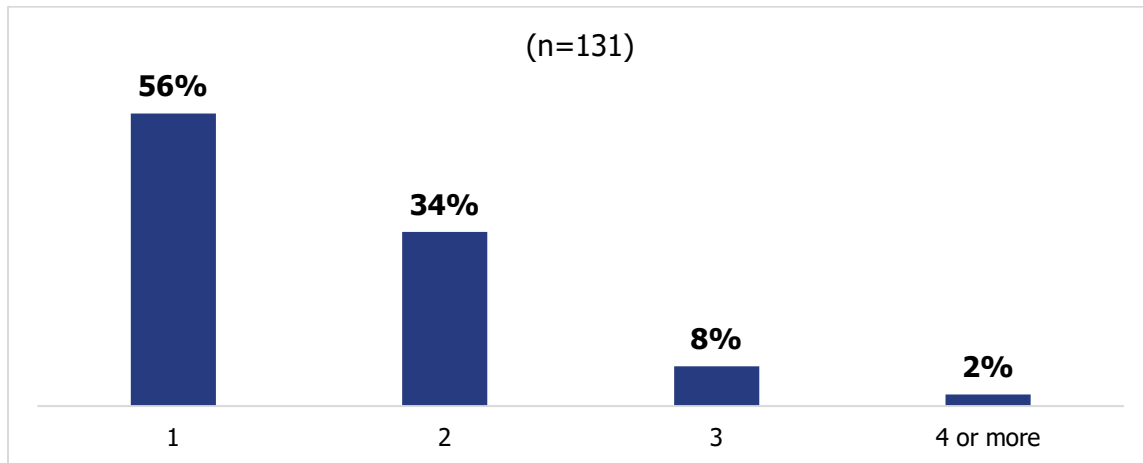


Figure 25. Number of Cars in Household



Appendix

Regulatory Background

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., 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.

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

Four Factor Analysis: Factor 3

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 less often now than before the COVID-19 pandemic
- ☐ I ride RTD about the same now as before the COVID-19 pandemic
- ☐ I ride RTD more often now than before the COVID-19 pandemic
- ☐ Not applicable – I did not use RTD before COVID-19 spread in March 2020

Four Factor Analysis: Factor 3

☐ 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 TOP THREE 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

Four Factor Analysis: Factor 3

- ☐ 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Translations through the RTD website	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Announcements in Spanish on buses/trains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Channel cards (signs) in Spanish on buses/trains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Signs in Spanish on RTD vehicles or at stations/stops	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Civil Rights (Title VI) complaint procedure in Spanish on buses/trains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How to buy a bus or rail ticket	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where buses and trains go	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Service and schedule changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Proposed service and schedule changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Service alerts for bus or train lines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Four Factor Analysis: Factor 3

Public meetings and open houses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How to apply for programs and services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Civil Rights (Title VI) complaint procedure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Free travel training program	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Language assistance services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access-A-Ride paratransit service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Call RTD Police at 303-299-2911	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Call RTD Customer Service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Text Transit Watch at 303-434-9100	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Follow emergency exit instructions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Four Factor Analysis: Factor 3

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)

Four Factor Analysis: Factor 3

- ☐ 한국어 (Korean)
- ☐ Русский (Russian)
- ☐ नेपाली (Nepali)
- ☐ አማርኛ (Amharic)
- ☐ عربي (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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Write English	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Understand English	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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): _____

Four Factor Analysis: Factor 3

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.)

- | | |
|---|--|
| <input type="checkbox"/> American Indian or Alaska Native | <input type="checkbox"/> Native Hawaiian or Other Pacific Islander |
| <input type="checkbox"/> Asian | <input type="checkbox"/> White |
| <input type="checkbox"/> Black or African American | <input type="checkbox"/> 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



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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 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

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:

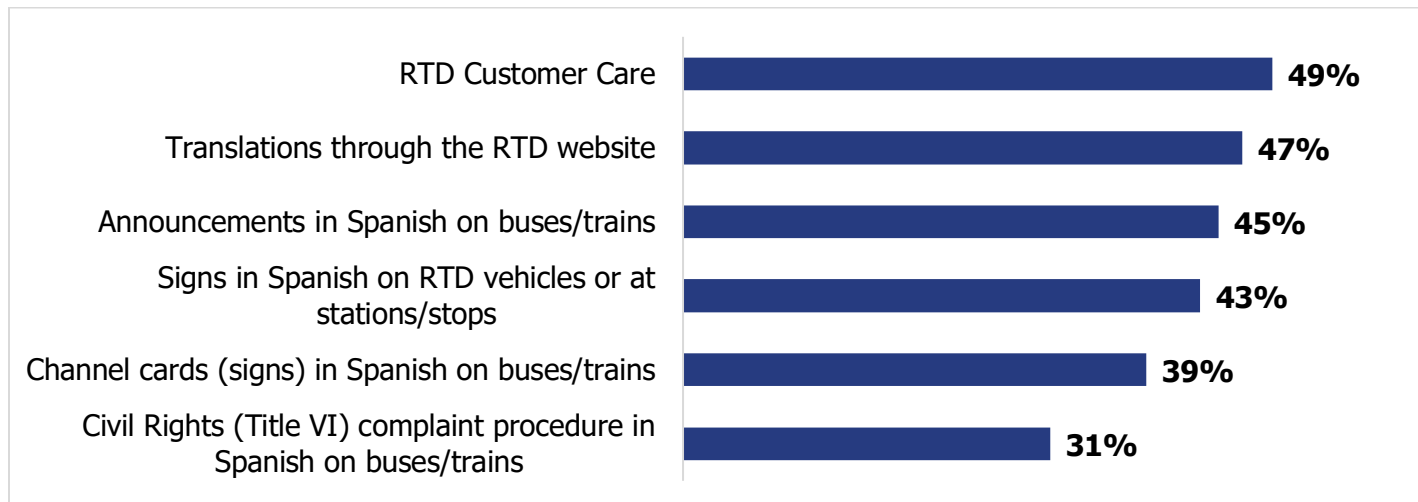
- **Printing** – During the pandemic, printing was extremely limited. All major updates were published through RTD’s website, supported by social media, Transit Management Organizations and community partners. PDFs were made available of certain materials on request and often in Spanish.
- **On-vehicle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



Attachment G

Subrecipient's Title VI Compliance Guide

SUBRECIPIENT TITLE VI COMPLIANCE GUIDE



RTD

2022

Equitable distribution of transit service is a core principle of the Regional Transportation District. This document describes the measures taken to promote equitable transit service as stipulated by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 (Environmental Justice).

By The Civil Rights Division – Transit Equity Office

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Exhibit:

Title VI Policy Statement

BACKGROUND

Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD) functional mission to provide public transit service within the Denver region. An equitable mass transit system fairly distributes the benefits and adverse effects of transit service without regard for race, color, national origin, or low-income status. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 pertaining to environmental justice.

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

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."



The intent of Title VI is to remove barriers and conditions that prevent minority and low-income persons as well as persons with limited English proficiency (LEP) from equal access to public goods and services. In effect, Title VI promotes fairness and equity in federally assisted programs and activities. Title VI is rooted in the Constitutional guarantee that all human beings are entitled to equal protection of the law, and specifically addresses involvement of impacted persons in the decision-making process.

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Environmental Justice. In this circular, the FTA requires that RTD document measures taken to comply with U.S. Department of Transportation's (DOT's) Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA.

Subrecipients of federal financial assistance are also required to comply with Title VI and Environmental Justice requirements.

Subrecipients

As the regional transit provider for the Denver Metro area, RTD is a designated and primary recipient for FTA grant funding. An organization becomes a subrecipient of federal funding when RTD enters into an Intergovernmental Agreement (IGA) which extends federal funding to (e.g. federal grants, loans, real estate). Per federal Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. If a subrecipient of RTD is not in compliance with Title VI requirements, then RTD as the primary recipient is also not in compliance.

Accordingly, all RTD IGAs that extend federal funding state “This Agreement and all subgrants, third party contracts and subcontracts are therefore subject to the FTA Master Agreement and all other applicable federal transit regulations...” RTD has developed this compliance guide to aid subrecipients in fulfilling applicable Title VI requirements.

TITLE VI PROGRAM

Subrecipients are required to submit a Title VI Program to RTD. In the Title VI Program, subrecipients describe the scope of the federally funded program, project or activity and how the subrecipient will ensure non-discrimination throughout the entire program. Subrecipient’s must demonstrate compliance with DOT’s Title VI regulations, by providing within their Title VI Programs, documentation, including records and reports.

RTD encourages subrecipients to adopt our notice to beneficiaries, complaint procedures and complaint forms, public participation plan, and language assistance plan where appropriate.

Subrecipients must submit their first Title VI Program **within six months** of the execution of the applicable intergovernmental agreement (or any other contract mechanism).

After the first submission, subrecipients must submit a Title VI Program Update annually for the life of the agreement. The update should include any recent activities Title VI Program Updates are due by December 1st of each year.

A Title VI Program must include the following to demonstrate Title VI compliance.

Title VI Policy Statement

Subrecipients must provide a Title VI Policy Statement affirming a commitment to complying with Title VI of the Civil Rights Act of 1964 and ensuring nondiscrimination in the applicable programs, policies and activities of the intergovernmental agreement with RTD. The policy statement should be signed by the same signatory of the intergovernmental agreement and included with in the Title VI Program.

Title VI Compliant Form, Complaint Procedures and Public Notice

Subrecipients must develop a Title VI complaint form, allowing the public to submit a Title VI complaint. Subrecipients must also develop Title VI complaint procedures for investigating and tracking Title VI complaints filed against them. The form and procedure for filing a complaint shall be available on the subrecipient’s website.

Subrecipients are required to prepare and maintain a complaint log, listing any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA lawsuits and complaints naming the subrecipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

Complaint Log Example

No.	Investigation/ Lawsuits/ Complaint	TVI Basis	Complaint Method	Receipt Date	Status	Action Taken
1	Complaint	Color	Letter	Wednesday, June 2, 2021	Closed	No violation found. Response letter issued.
2	Lawsuit	Race, Color	Complaint Form	Tuesday, January 18, 2022	Closed	Settlement Reached

Subrecipients are required to provide information to the public regarding the subrecipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, subrecipients shall disseminate this information to the public by posting a Title VI notice on their website and in public areas such as the subrecipient's office(s), including the reception desk, meeting rooms, etc.

The public notice must include the following:

1. A statement that the subrecipient operates programs without regard to race, color, or national origin.
2. A description of the procedures that members of the public should follow in order to request additional information on the subrecipient's Title VI obligations.
3. A description of the procedures that members of the public shall follow **in order to file** a Title VI discrimination complaint against the subrecipient.

To the extent that it is appropriate, RTD encourages subrecipients to adopt RTD's complaint form, procedures, and public notice. RTD will determine this requirement with each subrecipient during the initial intake.

Public Participation Plan

Subrecipients must create a public participation plan demonstrating how they intend to authentically engage low-income and minority populations with respect to the project, program or activity. Plans should include how subrecipients offer continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed decisions. Subrecipients are offered great latitude in their ability to tailor their approach considering their unique programs, projects or activities and blend of cultures among their beneficiaries.

To the extent that it is appropriate, RTD encourages subrecipients to adopt RTD's Public Participation Plan. RTD will determine this requirement with each subrecipient during the initial intake.

Meaningful Access for Limited English Proficiency Plan (LEP)

In order to ensure that beneficiaries have access to benefits, services, information, and vital documents. Subrecipients will need a Language Assistance Plan for LEP persons, failure to provide language assistance for LEP person may result in discrimination. Subrecipient's can do this by conducting a Four Factor Analysis; FTA

requirement, this will assist in determining what specific languages would be appropriate to provide. The Four Factor Analysis is an individualized assessment that balances the following four factors:

- I. Identify the number and proportion of LEP persons likely to be encountered by the subrecipient.
- II. Determine the Frequency of contact with which LEP persons come into contact with the subrecipient.
- III. Determine the Nature and Importance of the program, activity, and/or service provided.
- IV. Identify the resources available to the subrecipient and the costs.

Safe Harbor Provisions:

The safe harbor threshold assists agencies with determining when it is necessary to translate vital documents. DOT adopted the Department of Justice's (DOJ) Safe Harbor Provision which stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that makes up five percent (5%) or 1,000 persons, whichever is less, of the total population of person eligible to be served, encounter or affected by your service.

For more in-depth information for the Four Factor LEP analysis and developing a Language Access Plan, check out the US DOT's LEP Guidance [here](#).

Once the four factor analysis has been completed the subrecipient can determine what language assistance services are required.

To the extent that it is appropriate, RTD encourages subrecipients to adopt RTD's Language Access Plan. RTD will determine this requirement with each subrecipient during the initial intake.

Inclusive Advisory and Planning Boards

Subrecipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must:

- Provide a table depicting the racial breakdown of the membership of those committees.
- A description of efforts made to encourage the participation of minorities on such committees or councils.
- Ascertain racial breakdown through self-reporting from members (do not guess).

The racial breakdown table and the description of efforts to include minorities should be included within the subrecipients Public Participation Plan.

Determining Site or Location of a Facility

In determining the site or location of facilities, subrecipients may not make site selections that subject people to discrimination on the grounds of race, color, or national origin. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with Title VI:

- a. Subrecipients shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Subrecipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- b. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done

at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.

- c. If the subrecipient determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, the subrecipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Subrecipients must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

OTHER REQUIREMENTS

Title VI Coordinator

Subrecipients must designate a Title VI Coordinator who is responsible for managing and monitoring Title VI compliance, providing Title VI Program updates and serves as the point of contact for RTD's Transit Equity Office.

Requirement to Provide Additional Information

RTD may request, at its discretion, information other than that required by this guide from a subrecipient's in order for RTD to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT's Title VI regulations.

TECHNICAL ASSISTANCE

Subrecipients in need of technical assistance in complying with any of the requirements set forth in this document should contact RTD's Civil Rights Division – Transit Equity Office.

The Regional Transportation District
Civil Rights Division – Transit Equity Office
1600 Blake St, BLK-31
Denver, CO 80202

Dani McLean, Transit Equity Specialist
303.229.2051
dani.mclean@rtd-denver.com

Annette Hunter, Transit Equity Specialist
303.229.2184
annette.hunter@rtd-denver.com

Carl Green Jr. MPA, Transit Equity Manager
303.229.2370
carl.green@rtd-denver.com

TITLE VI PROGRAM CHECKLIST

Below is a checklist summarizing the requirements stated above.

- ☐ **Title VI Policy Statement:** The policy statement should be signed by the signatory of the intergovernmental agreement and included with your agency's Title VI Program and Title VI Program Updates.
- ☐ **Title VI Public Notice:** A copy of the subrecipient's Title VI notice to the public that indicates the recipient complies with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted.
- ☐ **Title VI Complaint Form & Procedures:** A copy of the subrecipient's instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.
- ☐ **Title VI Complaint List:** A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the subrecipient since the time of the last submission. This list should include only those investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs.
- ☐ **Title VI Public Participation Plan:** A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. A subrecipient's targeted public participation plan for minority populations may be part of efforts that extend more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.
- ☐ **Language Assistance Plan:** A copy of the subrecipient's plan for providing language assistance to persons with limited English proficiency, based on the DOT LEP Guidance.
- ☐ **Inclusive Advisory and Planning Boards:** Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must:
 - Provide a table depicting the racial breakdown of the membership of those committees.
 - A description of efforts made to encourage the participation of minorities on such committees or councils.
 - Based on self-reporting not guessing
- ☐ **Determining Site or Location of a Facility:** Prior to the selection of a site or construction of a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the subrecipient shall include a copy of the Title VI facility siting equity analysis conducted during the planning stage with regard to the location of the facility.

Exhibit: Title VI Policy Statement

Title VI Policy Statement

The **[Insert organization/entity]** is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not. **[Insert name and title of Title VI Coordinator]** is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 49 CFR Part 21.

Signature of Authorizing Official

Official Date

Printed Name and Title

Attachment H

2021 Service Performance Monitoring Report, with Documentation of Board Approval

2021 Service Performance Monitoring Report

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



Title VI Service Monitoring Report

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Title VI Service Monitoring Report

Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD) functional mission to provide mass transit services within the Denver metro region. An equitable mass transit system distributes the benefits and adverse effects of transit service fairly without regard for race, color, national origin or low-income status. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order (EO) 12898 pertaining to environmental justice (EJ).

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

In 1994, President Clinton issued EO 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."

The Federal Transit Administration's (FTA's) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and EJ. In this circular, the FTA requires that RTD document measures taken to comply with DOT's Title VI regulations by submitting a Title VI Program to the FTA every three years.

Service Standards and Transit Monitoring Overview

Part of RTD's compliance with FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients (Title VI Circular) is ongoing performance monitoring across all service modes (bus, light rail and commuter rail). The Title VI Circular does not require monitoring for demand response service. Aligned with RTD's 2021-2026 Strategic Plan, staff will conduct an annual review of resource and service distribution. The objective is to ensure that the distribution is equitable across RTD's system. The analysis in this report compared minority and/or low-income access to that of non-minority and/or higher-income access across six service performance metrics for data compiled during calendar year (CY) 2021:

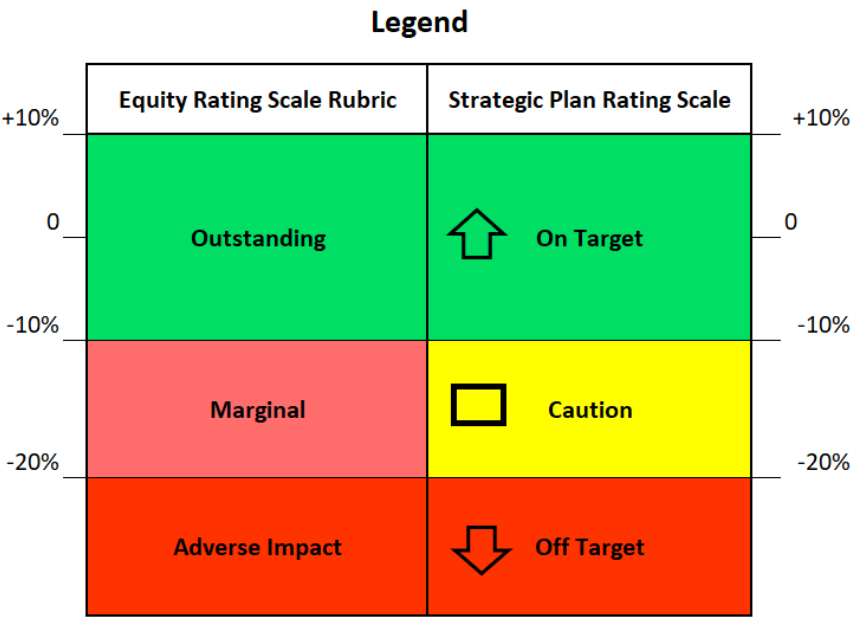
1. **Revenue hours:** RTD evaluates the amount and distribution of revenue hours of service provided. The hours while in service include trip start to finish.
2. **On-time performance:** RTD defines "on-time" as no more than one minute early or five minutes late, measured at time points.
3. **Vehicle loads:** RTD evaluates whether local, regional, SkyRide, Bus Rapid Transit, light rail vehicles, and commuter rail vehicles are overcrowded by comparing the load/seat factor for each vehicle type and period (peak and midday). RTD used automated passenger counter data to calculate compliance with the maximum load standard. The maximum load factor is the ratio of the total number of passengers on a trip to the total number of vehicle seats on each individual trip. For each route, the count of the trips that exceeded the load factor are divided by the total number of sampled trips to determine the percentage of trips that exceeded the load factor. RTD requires that vehicle load standards be met 60% of the time.

Title VI Service Monitoring Report

- 4. **Service availability:** RTD considers persons residing within one-half mile of bus stops and/or rail stations as having service available. Service availability is expressed as number and percentage of district-wide population and is determined by vehicle mode.
- 5. **Stop amenities:** RTD analyzes the distribution of stop amenities in the RTD system (shelters, seating, lighting, waste receptacles, etc.) to identify any potential disparities.
- 6. **Vehicle assignment:** The FTA expects that the average age of vehicles on minority and/or low-income lines/routes should be no more than the average age of vehicles on non-minority and/or higher-income lines/routes.

Title VI Service Performance Measure Rating Scale Rubric

The target for RTD’s 2021-2026 Strategic Plan objective is within 10% or better. This range will guide RTD in establishing a baseline to set targets for subsequent years. Above the 10% threshold but within 20% would result in a “marginal” score. A marginal score would be flagged as a caution and area for improvement. Any measure that exceeds 20% would indicate “adverse impact” and would result in a system-wide disparate impact¹/disproportionate burden² finding per the Federal Transit Administration. RTD will work to improve service and access on an ongoing basis to ensure that RTD’s equity targets are achieved and for compliance with RTD’s board-adopted Title VI Program.



¹ A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin.
² A facially neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations.

Title VI Service Monitoring Report

Minority vs. Non-Minority Lines/Routes³

Equity Metric: Distribution of Amenities			
2021			
Metric	<= 20% Difference	<=10% Difference	As good or better on minority lines/routes
% of stops with amenity on minority vs. non-minority lines/routes			
Seating	✓	✓	✓
Lighting	✓	✓	✓
Elevators	✓	✓	✓
Digital Displays	✓	✓	✓
Shelters	✓	✓	✓
Signs, Maps and/or Schedules	✓	✓	✓
Waste Receptacles	✓	✓	✓
Ticket Vending Machines	✓	✓	✓

Equity Metric: Service Standards															
2021															
Metric	<=20% Difference					<=10% Difference					As good or better on minority lines				
	Minority and non-minority comparison by mode and for the system as a whole														
	L C L	R G L	L R T	C R T	S Y S	L C L	R G L	L R T	C R T	S Y S	L C L	R G L	L R T	C R T	S Y S
Vehicle Loads	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Revenue Hours	✓	✓	✗	✓	✓	✓	✓	✗	✓	✓	✓	✓	✗	✓	✓
On-Time Performance	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗	✓	✓
Vehicle Assignment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Service Availability	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✓

✓ = Performance meets metric at level indicated
✗ = Performance does not meet level indicated

³ A minority line/route is defined by the FTA as having at least one-third of its revenue vehicle hours in census block groups with above-average minority populations.

Title VI Service Monitoring Report

Minority vs. Non-Minority Lines/Routes Performance Results

Distribution of Amenities (See Exhibit A for full details)

- The percentage of stops containing each amenity on minority lines/routes exceeds the percentage for non-minority lines in all categories examined except for ticket vending machines and digital displays, which are higher for non-minority lines/routes (4 % compared to 3 % of stops and 2.4% compared to 2.8% respectively).

Vehicle Loads (See Exhibit B for full details)

- Average load/seat percentages range from a low of 0.00% to a high of 9.20%.
- All average loads by mode are below the maximum load factor for every period.

Revenue Hours (See Exhibit C for full details)

- A slightly lower percentage of revenue hours of service are provided on minority bus routes than non-minority routes (49% vs. 51%, respectively).
- A lower percentage of revenue hours of service are provided on minority light rail lines than non-minority lines (36% vs. 64%, respectively).
- A greater percentage of revenue hours of service are provided on minority commuter rail lines than non-minority lines (78% vs. 22%, respectively).
- A slightly lower percentage of revenue hours of service are provided on all minority modes of service than all non-minority modes of service (48% vs. 52%, respectively).

On-time Performance (OTP) (See Exhibit D for full details)

- Average OTP for minority local bus routes is 1% lower than OTP for non-minority local bus routes on weekdays. The Saturday and Sunday average OTP for minority local bus routes are 4% lower than OTP for non-minority local bus routes.
- Average OTP for minority regional bus lines is 9% greater than OTP for non-minority regional bus routes on weekdays. The Saturday average OTP for minority regional bus routes is 10% greater than OTP for non-minority local bus routes. The Sunday average OTP for minority regional bus routes is 4% lower than OTP for non-minority local bus routes.
- Average OTP for the four minority light rail lines is 2% lower than the OTP for the three non-minority light lines for Monday-Thursday, Friday, and weekends.
- All commuter rail lines are considered minority lines.

Vehicle Assignment (See Exhibit E for full details)

- RTD is unable to examine vehicle assignments consistently or accurately now. RTD will explore other options to report this measure later this year, allowing for this portion of the analysis to be completed.
- For light rail and commuter rail there are no specific alignment for a certain model or year. RTD assigns the number of vehicles per train, which is based solely on ridership.

Service Availability (See Exhibit F for full details)

- A higher percentage of the RTD district's minority population lives within ½ mile of local bus, light rail and commuter service compared to the district's non-minority population. Regional bus has a slightly higher percentage for non-minority compared to minority (15.5% vs. 11.8%, respectively).

Title VI Service Monitoring Report

Low-Income vs. Higher-Income Lines/Routes⁴

Equity Metric: Distribution of Amenities			
2021			
Metric % of stops with amenity on low-income vs. higher-income lines/routes	<= 20% Difference	<=10% Difference	As good or better on low-income lines/routes
Seating	✓	✓	✓
Lighting	✓	✓	✗
Elevators	✓	✓	✗
Digital Displays	✓	✓	✗
Shelters	✓	✓	✗
Signs, Maps and/or Schedules	✓	✓	✗
Waste Receptacles	✓	✓	✗
Ticket Vending Machines	✓	✓	✓

Equity Metric: Service Standards															
2021															
Metric Low-income and higher- income comparison by mode and for the system as a whole	<=20% Difference					<=10% Difference					As good or better on low-income lines/routes				
	L	R	L	C	S	L	R	L	C	S	L	R	L	C	S
	C	G	R	R	y	C	G	R	R	y	C	G	R	R	Y
	L	L	T	T	s	L	L	T	T	s	L	L	T	T	S
Vehicle Loads	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Revenue Hours	✓	✓	✓	✗	✓	✓	✓	✓	✗	✓	✓	✓	✓	✗	✓
On-Time Performance	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Vehicle Assignment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Service Availability	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

✓ = Performance meets metric at level indicated
✗ = Performance does not meet level indicated

⁴ Low-income is defined as households at or below 150% federal poverty. A low-income line/route is defined as having at least one-half of its revenue vehicle hours in census block groups with above-average low-income populations.

Title VI Service Monitoring Report

Low-Income vs. Higher-Income Lines Performance Results

Distribution of Amenities (See Exhibit A for full details)

- The percentage of stops containing each amenity on higher-income lines/routes exceeds the percentage for low-income lines/routes in all categories examined except for seating, which is higher for low-income lines/routes (44% compared to 46% of stops, respectively). Ticket vending machines are comparable for both lines/routes.

Vehicle Loads (See Exhibit B for full details)

- Average load/seat percentages range from a low of 0.00% to a high of 9.20%.
- All average loads by mode are below the maximum load factor for every period.

Revenue Hours (See Exhibit C for full details)

- A slightly lower percentage of revenue hours of service are provided on low-income bus routes than higher-income routes (49% vs. 51%, respectively).
- The same percentage of revenue hours of service are provided on both low-income and higher-income light rail lines at 50%.
- A greater percentage of revenue hours of service are provided on higher-income commuter rail lines than low-income lines (63% vs. 37%, respectively).
- A slightly lower percentage of revenue hours of service are provided on all low-income modes of service than all higher-income modes of service (48% vs. 52%, respectively).

On-time Performance (OTP) (See Exhibit D for full details)

- Average OTP for low-income and higher-income local bus routes (LBR) is the same on weekdays. Saturday average OTP for low-income LBR is 2% lower than OTP for higher-income LBR. Sunday average OTP for low-income LBR is 1% lower than OTP for higher-income LBR.
- Average OTP for low-income regional bus routes is 9% greater than OTP for higher-income regional bus routes on weekdays. The Saturday average OTP for low-income regional bus routes is 9% greater than OTP for higher-income local bus routes. The Sunday average OTP for low-income regional bus routes is 9% lower than OTP for higher-income local bus routes.
- Average OTP for the three low-income light rail lines is the same as the OTP for the four higher-income light lines for Monday-Thursday and weekends. Average OTP for the three low-income light rail lines is 2% lower than the OTP for the four higher-income light lines for Friday.
- Average OTP for the two low-income commuter rail lines is 8% lower for Monday-Thursday and 7% lower for Friday and Weekend compared to the two higher-income commuter rail lines.

Vehicle Assignment (See Exhibit E for full details)

- RTD is unable to examine vehicle assignments consistently or accurately now. RTD will explore other options to report this measure later this year, allowing for this portion of the analysis to be completed.
- For light and commuter rail there are no specific alignment for a certain model or year. RTD assigns the number of vehicles per train, which is based solely on ridership.

Service Availability (See Exhibit F for full details)

- A higher percentage of the RTD district's low-income population lives within ½ mile of local bus, regional bus, light rail, and commuter service compared to the district's higher-income population.

Title VI Service Monitoring Report

Exhibit A: Stop Amenities Tables

Category of Amenity	Pct. of Stops on Minority Lines/Routes	Pct. of Stops on Non-Minority Lines/Routes
Seating	44%	44%
Lighting	26%	22%
Elevators	<2%	<2%
Digital Displays	2.4%	2.8%
Shelters	8%	7%
Signs, Maps and/or Schedules	6%	5%
Waste Receptacles	11%	9%
Ticket Vending Machines	3%	4%

Category of Amenity	Pct. of Stops on Low-Income Lines/Routes	Pct. of Stops on Higher-income Lines/Routes
Seating	46%	44%
Lighting	21%	24%
Elevators	<1%	<2%
Digital Displays	3%	2.4%
Shelters	6%	8%
Signs, Maps and/or Schedules	3%	5%
Waste Receptacles	6%	10%
Ticket Vending Machines	3%	3%

Title VI Service Monitoring Report

Exhibit B: Vehicle Loads Table

Minority and Non-Minority

Local		
Time Period	Minority	Non-Minority
Peak (125%)	0.10%	0.19%
Midday (100%)	0.19%	0.16%

Bus Rapid Transit		
Time Period	Minority	Non-Minority
Peak (100%)	0.78%	n/a
Midday (100%)	0.03%	n/a

Regional		
Time Period	Minority	Non-Minority
Peak (100%)	0.05%	0.00%
Midday (100%)	0.00%	0.00%

SkyRide		
Time Period	Minority	Non-Minority
Peak (100%)	0.00%	4.15%
Midday (100%)	0.30%	9.20%

Commuter Rail		
Time Period	Minority	Non-Minority
Peak (100%)	0.00%	0.00%
Midday (100%)	0.00%	0.00%

Light Rail		
Time Period	Minority	Non-Minority
Peak (100%)	0.77%	1.30%
Midday (100%)	0.03%	0.14%

Title VI Service Monitoring Report

Exhibit B: Vehicle Loads Table

Low-Income and Higher-Income

Local		
Time Period	Low-Income	Higher-Income
Peak (125%)	0.09%	0.17%
Midday (100%)	0.12%	0.25%

Bus Rapid Transit		
Time Period	Low-Income	Higher-Income
Peak (100%)	0.78%	n/a
Midday (100%)	0.03%	n/a

Regional		
Time Period	Low-Income	Higher-Income
Peak (100%)	0.05%	0.00%
Midday (100%)	0.00%	0.00%

SkyRide		
Time Period	Low-Income	Higher-Income
Peak (100%)	0.00%	4.15%
Midday (100%)	0.30%	9.20%

Commuter Rail		
Time Period	Low-Income	Higher-Income
Peak (100%)	0.00%	0.00%
Midday (100%)	0.00%	0.00%

Light Rail		
Time Period	Low-Income	Higher-Income
Peak (100%)	0.53%	1.17%
Midday (100%)	0.05%	0.08%

Title VI Service Monitoring Report

Exhibit C: Revenue Hours Tables

Mode of Service	Minority Hours	Non-Minority Hours	Difference; Minority to Non-Minority + / (-)
Bus	49%	51%	(2)
Light Rail	36%	64%	(28)
Commuter Rail	78%	22%	56
System	48%	52%	(4)

Mode of Service	Low-Income Hours	Higher-Income Hours	Difference; Low Income to Higher-Income + / (-)
Bus	49%	51%	(2)
Light Rail	50%	50%	0
Commuter Rail	37%	63%	(26)
System	48%	52%	(4)

Title VI Service Monitoring Report

Exhibit D: On-Time Performance Table

Minority and Non-Minority

Mode of Service	Day	Avg. % On-Time (weighted)		
		Minority Lines/Routes	Non-Minority Lines/Routes	Difference; Minority to Non-Minority +/- (-)
Local Bus	Weekday	87%	88%	(1)
	Saturday	88%	92%	(4)
	Sunday	88%	92%	(4)
Regional Bus	Weekday	92%	83%	9
	Saturday	97%	87%	10
	Sunday	88%	92%	(4)
Light Rail	Mon-Thurs	94%	96%	(2)
	Friday	93%	95%	(2)
	Weekend	94%	96%	(2)
Commuter Rail	Mon-Thurs	92%	n/a	n/a
	Friday	92%	n/a	n/a
	Weekend	93%	n/a	n/a

Title VI Service Monitoring Report

Exhibit D: On-Time Performance Table

Low-Income and Higher-Income

Mode of Service	Day	Avg. % On-Time (weighted)		
		Low-Income Lines/Routes	Higher-Income Lines/Routes	Difference; Low Income to Higher-Income + / (-)
Local Bus	Weekday	87%	87%	0
	Saturday	88%	90%	(2)
	Sunday	89%	90%	(1)
Regional Bus	Weekday	92%	83%	9
	Saturday	89%	98%	(9)
	Sunday	89%	98%	(9)
Light Rail	Mon-Thurs	95%	95%	0
	Friday	93%	95%	(2)
	Weekend	95%	95%	0
Commuter Rail	Mon-Thurs	96%	88%	8
	Friday	95%	88%	7
	Weekend	96%	89%	7

Title VI Service Monitoring Report

Exhibit E: Vehicle Assignment Justification

At RTD, vehicle assignments are put together in blocks that typically consist of operations on multiple routes (typically referred to as interlining or through-lining). Putting work together in blocks is operationally more efficient and takes fewer resources, but in many cases makes it impossible to keep buses on a single route. Because of the way blocks are put together, it is possible to have a combination of contractors and RTD operators providing services on what we constitute as a route. In other cases, a block could be composed of several different routes that connect at common locations, such as transfer centers. After adding in limitations of the technology and other factors, it is difficult to assign a specific bus to operate on a specific route. As a result, RTD is unable to examine vehicle assignments consistently or accurately now. RTD will explore other options to report this measure later this year, allowing for this portion of the analysis to be completed.

For light rail and commuter rail there is no specific alignment for a certain model or year. RTD assigns the number of vehicles per train, which is based solely on ridership.

Title VI Service Monitoring Report

Exhibit F: Service Availability Table

Demographic Analysis of Proximity to RTD Service (Percent)		RTD District	RTD District	% within 1/2* Mile			% within 1/4 Mile	% within 3 miles	Frequent All Day Service within 1/2 Mile		Frequent Peak and/or Midday Service within 1/2 Mile	
		Totals	Merged Buffers	Limited	Regional	Rail	Local Bus	CRT	Bus	Bus & Rail	Bus	Bus & Rail
Population	Total (ACS 5-year estimate, 2015-2019)	3,015,645	69.5%	24.6%	14.2%	7.4%	57.7%	30.3%	23.9%	27.1%	24.2%	27.4%
Minority	All Minorities*	1,078,739	77.3%	28.7%	11.8%	8.9%	66.4%	40.8%	30.3%	33.7%	30.7%	34.1%
Non-Minority	White (Non-Hispanic)	1,936,906	65.2%	22.4%	15.5%	6.6%	52.9%	24.4%	20.4%	23.5%	20.6%	23.6%
Population	Total population with known income (ACS 5-year estimate, 2015-2019)**	2,970,345	69.4%	24.6%	13.9%	7.4%	57.5%	30.3%	23.6%	26.8%	23.9%	27.0%
Income	Below 150% of Poverty Level	464,699	82.2%	31.2%	16.6%	11.0%	71.6%	40.6%	35.4%	38.9%	35.7%	39.3%
Income	Above 150% of Poverty Level	2,505,646	67.0%	23.4%	13.4%	6.7%	54.9%	28.4%	21.5%	24.5%	21.7%	24.8%
Sources: RTD GTFS GIS, US Census American Community Survey Tables: 2015 - 2019 (5-Year Estimates), Table B03002. Hispanic or Latino Origin by Race, and Table C17002. Ratio Of Income to Poverty Level in The Past 12 Months (Block Group Level Data), USDOT National Address Database (NAD)												
To adjust for the fact that some census block groups are only partially within the District, the fraction of each block group's population within the transit district was calculated by using the percentage of address points within the district and each block group. This address fraction was the factor used to proportion Census counts resulting in demographics within buffers for each service and PnR. Address points come from the USDOT National Address Database.												
* All Minorities include Black (non-Hispanic), Hispanic, Asian (non-Hispanic), Native American (non-Hispanic), Hawaiian Native and Pacific Islander (non-Hispanic), and Other (Including Mixed Race, non-Hispanic).												
** Population totals for the RTD district vary between statistics for race and income/poverty in part since the Census is a full count, and the ACS is an extrapolation based on a sample, and in part because the ACS total excludes those whom poverty status is not determined.												

Attachment I

RTD Transit Service Policies and Standards

Transit Service Policies & Standards

*Approved
July 19, 2016*



Regional Transportation District

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1. Introduction

1.1 Overview

RTD continually receives requests for changes to existing service and for new service in growing areas of the District. Additionally, RTD may be operating some services that are not attracting enough riders to justify their cost. In order to be consistent in the evaluation of service proposals, and to ensure that the service being provided represents the most cost-effective use of the District's resources, a set of service standards is maintained by RTD.

The specific standards, targets or minimum/maximum values for the standards, and a procedure for applying these standards, are presented in this document. Since service standards are intended to optimize usage of the District's resources, they are updated periodically to reflect changes in the District goals and resources. The procedure for updating the standards is described in Section 1.3.

1.2 Application of Service Standards

There are two primary applications for the ongoing use of the service standards. These are the use of standards to evaluate existing services, and use of standards to evaluate proposals for new service.

The application of standards to existing routes is a flexible process. The purpose of the standards is to help identify routes which are most in need of service changes, such as restructuring to eliminate lower productivity segments or branches, adjusting service frequency to better reflect the demand for service, or providing additional promotion of less patronized routes where appropriate. Routes, which do not meet standards, are not automatically designated for elimination. Elimination of routes is only intended as a last resort, when it has been determined that no cost-effective actions are available to improve the productivity of the route.

The standards for evaluation of existing routes are not intended to preclude changes to routes that meet these minimum standards. In many cases, it may be possible to improve the productivity of routes that meet the minimum standards by making changes to headways or trip times. Since the overall mission of RTD is *"To meet our constituents' present and future public transit needs by offering safe, clean, reliable, courteous, accessible and cost-effective service throughout the District,"* these standards should not be used to prevent changes to improve the efficiency of existing routes, as long as the changes meet the route design standards.

The availability of financial resources, represented by the annual budget, is the bottom line for these standards. Service expansion may occur when additional funds are available and contraction may occur otherwise. In any case, selection of which services to provide or curtail is based on these performance standards and no service is considered guaranteed

or beyond review. The RTD Board of Directors, with input from RTD staff and the public, is responsible for making decisions on service recommendations.

The evaluation of new service proposals will take place as proposals are received or needs identified. The most recent values of the standards for existing routes will be used to evaluate the proposed new services. Decisions regarding implementation of new routes will be made through the service planning process. New routes and services will be expected to meet all applicable design standards described in Sections 2, 3 and 54, but will not be expected to meet the productivity standards described in Section 2.3.2.1 until they have been in operation for at least six months. Demonstration, experimental, and cost sharing services are also handled in this manner.

1.3 Updating of Service Standards

The service standards are intended to support the goals and objectives of the District. Since these objectives and the resources available to attain them can be expected to change over time, the standards will be revised periodically to reflect those changes.

The service standards will be reviewed on a bi-annual basis. At that time, experience with the service standards over the previous time period, as well as changes in the District's goals and objectives, will be used to determine whether any standards should be added or revised.

The numerical values of productivity standards will be updated each year, using ridership, revenue and cost figures for the most recent twelve-month period for which data are available. The rankings are based only on those routes that existed for the entire year. Routes which were eliminated during the year will not be included because they cannot be identified as candidates for revisions. Routes that were introduced during the year will not be included in determining the new standards since they are not required to meet the productivity standards until they have been in operation for at least six months. However, these routes will be evaluated separately, using the service standards contained in this document.

The updating procedure will compare the values of the productivity standards with those in effect for the previous year. Operating cost data for the previous year will be revised to account for system-wide increases or decreases in operating cost.

2. Performance Standards

2.1 Derivation and Use of Standards

The productivity standards are used to identify routes and services for appropriate marketing and possible revision or elimination. Separate standards are identified for each class of service. Routes are evaluated on ridership (either boardings per in-service hour or per trip, depending on the class of service) and on the economic measure of subsidy per passenger. These standards are based on the performance of the least productive 10 percent of the routes in each service class for either the ridership or economic measure, or

on the least productive 25 percent of routes in both measures. The basis for the standards will be reviewed in conjunction with the cost recovery standards in Section 9, and may be revised if necessary.

New services should meet the applicable standards for their class of service after six months of operation. All new services will be reviewed after six months of operation and routes that have not shown adequate progress toward meeting the standards will be targeted for cost-effective actions to increase productivity or for elimination.

To meet the RTD mission to provide *cost-effective service throughout the District*, RTD has developed different types or classes of service that serve specific markets and, therefore, have different performance expectations. Due to their different service characteristics Express, Regional and SkyRide were treated as separate classes. However, due to the deployment of rail, BRT and resulting service restructuring, these classes are reconfigured. The routes in these three are reassigned into a new, consolidated Regional class or the Local CBD class. Regional class includes routes providing high-speed service on limited access highways from suburban and outlying communities to downtown Denver, Denver International Airport and other metro, major employment centers, and provided at distances of approximately 6 miles or more. Local services have three sub-classifications: CBD—any route serving downtown Denver; Urban—35% or more of route length within a ¼ mile buffer has population + employment density of 12 per acre or greater; and Suburban—34% or less. Call-n-Ride and Access-a-Ride are separate classes. Enhanced bus and BRT routes may warrant future consideration regarding their operation with: dedicated right-of-way; partially dedicated ROW; limited or express mode; priority over other traffic; and various speeds appropriate to context. [Please see attachment A Service Classes for details on how these revisions affect current routes.]

The standards for evaluating portions of routes are intended for use in identifying needed service improvements, for making modifications to specific portions of existing routes, or for identifying low productivity segments of routes.

These standards could be used in situations such as isolating low productivity portions of otherwise productive routes or measuring options for bringing unproductive routes into compliance with the overall service standards. These standards may also be used to evaluate proposals for new route extensions or deviations on existing routes.

2.2 Ridership and Economic Measures

The RTD's approach is to develop a family of transit services suited to a variety of travel markets. All services are designed to match the level of service with demand, thus improving performance and sustainability. This results in multiple domains of acceptable performance for the various classes of service. Standards are best set by first determining measures of performance and objectives. The core objective is to maximize overall ridership, to the extent allowed by the available resources.

2.2.1 Performance Objective

Service allocation is driven by the RTD adopted mission statement: “To meet our constituents’ present and future public transit needs by offering safe, clean, *reliable*, courteous, accessible *cost-effective service throughout the District.*”

Performance Measures

- Passengers/hour (productivity)
- Passengers/trip (Regional class productivity)
- Subsidy/passenger (cost effectiveness)

The subsidy per passenger measure combines fare revenue and total cost impacts to produce a measure that comprehensively reflects the District’s allocation of resources. The effectiveness-productivity chart, Figure 1 - Effectiveness - Productivity Chart, presents economic effectiveness on the vertical axis, and productivity, or boardings per hour, on the horizontal axis. The chart offers a convenient comparative analysis of all classes of services, illustrating both absolute and relative performance. When standards and guidelines are applied, judgments can be made.

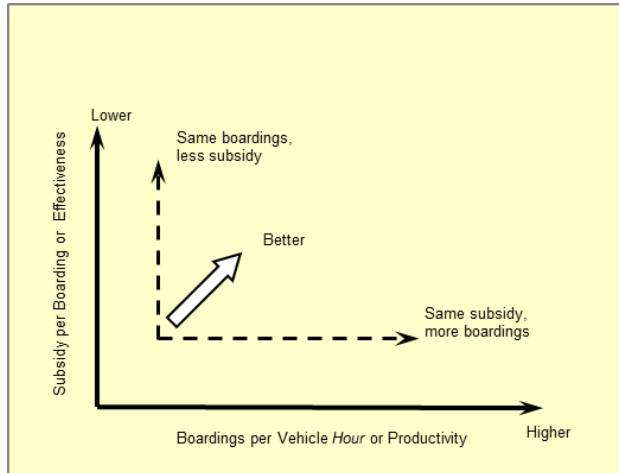


Figure 1 Effectiveness - Productivity Chart

2.3 Fixed Route Service Design and Evaluation Standards

2.3.1 Minimum Service Frequency

New routes shall provide the minimum frequencies specified below. Existing services that cannot meet these minimum standards while adhering to the minimum passengers per hour or trip standards defined in Section 2.3.2 shall be identified as candidates for service changes or appropriate marketing promotion within available resources. These service changes may include providing service with longer headways if no other viable alternative exists. Elimination of the route may be considered if service changes and/or promotional efforts do not improve productivity.

These are “policy” service levels and represent a compromise between economic efficiency and the functionality of the system. To be sustained at these levels, a route must meet the minimum ridership performance standards discussed in Section 2.3.2.1 and annual calculated standards. Routes providing frequencies higher than the policy minimum must be justified by ridership demand as outlined in Section 2.3.4.

The following table indicates the minimum frequency standard for types of service and time of day by corridor (multiple routes sharing a segment).

Service Type	Span of Service	Minimum Frequency
Local – Peak period	Mon–Fri 6:00am to 9:00am and 3:00pm to 6:00pm	30 minutes
Local – Off peak below 25% boardings per hour	Weekday midday (9:00am – 3:00pm)	60 minutes
Local – Off peak above 25% boardings per hour	Weekday midday	30 minutes
Local	Evenings and weekends	60 minutes
Regional to CBD	3 peak trips, Mon – Fri. Trips should target 7:00, 7:30, 8:00 AM shift work start times and 4:00, 4:30, 5:00 PM shift end times.	
Rail & Enhanced Bus (BRT)	Weekday 6:00am – 6:00pm	15 minutes
Rail & Enhanced Bus (BRT)	Weekday evenings 6:00pm – 11:00pm and Saturday	30 minutes
Rail & Enhanced Bus (BRT)	Night after 11:00pm	60 minutes
Rail & Enhanced Bus (BRT)	Sunday and holidays	60 minutes
SkyRide	3:00am to 1:00am daily	60 minutes

Table 1 Minimum Service Frequency

2.3.2 Minimum Ridership Performance

This standard applies to routes operating at the minimum service frequency target. For **Local** and **Limited** routes, the standard is passengers per hour based upon the bottom 10% and 25% of routes in the respective class. For **Regional**, and **SkyRide** routes, the standard is passengers per trip.

These standards are derived from system averages by class of service. All routes must meet their applicable minimum standards. Those that do not meet these standards will need to be modified or marketed in some way in order to bring them up to the minimum standards. Those that are not brought up to the minimum standards are subject to cancellation. Routes that meet their applicable minimum ridership standards justify a service level at the minimum service frequencies outlined in Section 2.3.1. Higher frequencies must be justified by ridership as outlined in Section 2.3.4.

2.3.2.1 Performance Standards

These measures and the effectiveness-productivity for all routes and services and the class 10% and 25% standards are calculated annually and are provided separately at <http://www.rtd-denver.com/ServiceDevelopment.shtml>, under Service Development Documents—Performance Reports.

2.3.2.2 Specific Trips Ridership Standards

The standard for evaluating specific trips on a route varies by time of day as shown in the following table. For reference see the last column of Attachment C Regional Bus Service Performance. Trips must have boardings of at least the specified percentage of the minimum boardings standard for the time period of the trip, as defined in Table 2

- On Regional routes with more than three trips and which provide only peak period service, the first and last trips must have minimum boardings of one-half the average for the class if the overall route meets the minimum boarding standard. For other routes Table 2 applies.
- On rail, the first trip of the operating day in each direction, operated as the "Sweep Train" and pull-outs, is exempted from the minimum ridership standards.

Time of Day for Service Class	Percentage of Average Ridership
5:00 am - 6:00 am	75%
6:00 am - 8:00 pm	100%
8:00 pm - 11:00 pm	75%
11:00 pm - 5:00 am	50%
First or Last Trip	50%

Table 2 Specific Trips Ridership Standards

2.3.3 Maximum Load (Crowding) Standard

From the Transit Capacity and Quality of Service Manual: "From the passenger perspective, the passenger load on a transit vehicle affects the comfort of the on-board vehicle portion of a transit trip-both in terms of being able to find a seat and in overall crowding levels within the vehicle. From a transit operator's perspective, a poor quality of service may indicate the need to increase service frequency or vehicle size to reduce crowding and increase passenger comfort."

RTD defines crowding as a seated load plus the standing passenger space, as calculated for each vehicle by subtracting the area occupied by seats and other objects from the gross interior floor area. The amount of crowding on a route is defined as the percent of total trips during a defined time period that exceed a comfort passenger level of 4.3—5.3 square feet per standee, generally having these characteristics (See page 5-24 of the Transit Capacity and Quality of Service Manual, 3rd Edition, http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_165ch-05.pdf):

- Standing load without body contact
- Standees have similar amount of personal space as seated passengers
- Reasonably easy circulation within vehicle

The maximum number of standees can be computed for each vehicle by determining its standing passenger square footage and dividing by 4.3—5.3. For any service class during any defined period (e.g., AM early, AM peak, midday), when 10% or more of the directional trips exceed the computed maximum standees at the maximum load point, further investigation of potential remedies, such as changing the bus assignment or frequency of service, is warranted. For special events heavier loads are expected and acceptable, but when 10% or more of trips during the take-away have 4 or less square feet per standing passenger, further investigation of potential remedies is warranted. See Attachment D Crowding Report Examples for reference. The Percent of Total Trips chart (lower right) with level-of-service D or E would indicate crowding.

2.3.4 Demand Based Service Frequency

Service frequency in the RTD network is based on clock-pattern schedules. This pattern provides consistent and easy to understand schedules for our customers, and makes possible the provision of timed transfer connection hubs, whereby multiple routes are scheduled to meet at one location to facilitate connections. In general, routes are scheduled to operate in even increments of 30 minutes, or every 60, 30, 15, 10, 7.5, or 5 minutes. However, other frequencies may be provided depending upon passenger demand, or operational and scheduling needs.

For routes meeting the above frequency, ridership, and load standards, frequency better than every 30 minutes may be provided when and where justified by ridership. This standard applies equally to all service categories. In order to be sustainable, higher frequency service must meet the following criteria:

- Incremental frequency necessary to maintain the appropriate load standard during any 30 minute time period.
- Appropriate vehicle assignment as outlined in Section 2.3.5
- When a service exceeds the maximum load standard, higher frequency may be justified during that time period and/or route segment.
- If a service with better than the minimum frequency has passenger loads that can be accommodated with a lower frequency without violating the load standard, then frequency may be reduced.
- As a general guideline, a typical productivity by service frequency, for a whole route or a segment or time period is provided in Table 3 - Demand Based Service Frequency

Frequency	Boardings Per Hour	
	Route	Segment-Period
60 - 30 minutes	Minimum for Class	-
15 minutes	25 - 39	35 +
10 minutes	40 +	45 +

Table 3 Demand Based Service Frequency

2.3.5 Vehicle Assignment Targets

Equipment shall be assigned to specific routes and trips according to the following guidelines. These guidelines may be modified if operational and scheduling needs require.

- Small 27'-30' Bus: Appropriate for lower volume **Local** routes where ridership does not require a standard bus, or for routes where specific operating concerns preclude use of standard buses and for **Call-n-Ride**.
- Standard 40' Transit Bus: The standard equipment for **Local** and **Regional** services.
- Articulated 60' Bus: Appropriate for higher volume Limited and Regional services.
- Intercity Coach: Appropriate for Regional and SkyRide services.

2.3.6 Design and Evaluation of Portions of Routes

The standards for evaluating portions of routes cover two areas in which minor modifications may be made to routes without changing the overall structure of the route:

- midline segments or midline deviations
- branches or end segments

The governing standards for overall route productivity were presented earlier. Since trips provided during marginally productive hours of the day or trips over marginal segments often increase the attractiveness of the overall service, an otherwise productive route may be able to support some less productive trips or portions of the route. However, if a route cannot meet the overall service standards for its class of service, there may not be productive segments to enhance the unproductive segments. Therefore, specific segments, branches, or trips which meet the standards for portions of routes may still be modified in order to raise the productivity of the entire route, if the overall route does not meet the service standards for its class of service.

2.3.6.1 Midline Segments and Midline Deviations

- A midline segment or deviation of a **Local** or **Limited** route should generate enough boardings per hour of service provided to meet the standard for its class of service (CBD, Urban and Suburban). Boardings in both directions will be counted.
- If a route is changed, the change shall not cause a reduction in the overall boardings per hour for the route.
- If a route is changed, the change shall not cause the route to violate any route design standards as defined in Section 2.3, or the overall productivity standards as defined in Section 2.

2.3.6.2 Branches and End Segments

- A branch or end segment of a **Local** or **Limited** route should generate enough boardings to meet the ridership standard for its class of service (CBD, Urban and Suburban).
- Boardings generated along the branch are defined as all passengers boarding the bus along the branch or end portion of the route, and all outbound passengers alighting along this section.
- Local collector portions of **Regional** routes which meet the following maximum travel time standard shall meet the ridership productivity standard for the entire route. This maximum travel time is equal to 15 minutes or 50 percent of line haul travel time, whichever is less.
- For shorter segments, the minimum ridership standard is reduced by the ratio of actual travel time to the maximum allowable travel time. Thus, if the actual travel time along the collector is half of the maximum allowed, it must average half the number of boardings per trip specified in the minimum ridership productivity standard.
- A new extension to a route that does not meet the minimum ridership productivity standard must attract sufficient ridership for the entire route to meet the minimum ridership standard for its service class.

- A route extension will not be initiated if it violates any of the route design standards found in Section 2.3, or causes the route as a whole to fall below the minimum riders per unit of service or standards found earlier in Section 2.3.2.

2.4 Demand Response Service Design and Evaluation Standards

RTD continues to develop a family of transit services suited to a variety of travel markets. The goal of this approach is to match the type and level of service to the demand in a given service area, thus improving performance and sustainability. As such, a variety of non-fixed route services are provided by the RTD including the following.

2.4.1 Call-n-Ride

Rather than operating on a fixed route and schedule, demand responsive Call-n-Ride service is characterized as a shared ride within a defined geographic service area and the need for the passenger to arrange for pick-up in advance or be at a designated checkpoint at prescheduled times. A Call-n-Ride service area averages about 7 square miles or between about 2 to 30 square miles depending on its number of vehicles and service configuration—predominantly station feeder or community-based service. Call-n-Ride often provides first/last mile access to the broader RTD network of services through timed connections at transfer centers and Park-n-Rides. Population plus employment is 3 to 12 persons per acre. Call-n-Ride service is evaluated based on passenger boardings per revenue hour and subsidy per passenger boarding.

2.4.2 Access-A-Ride

Access-a-Ride provides ADA complementary paratransit in the District to individuals who cannot readily access the bus and rail system. As per US DOT requirements the passenger's trip origin and destination must be within $\frac{3}{4}$ mile of RTD's non-commuter bus route system, during the same days and hours of their operation and within the District boundaries, and curb-to-curb service must be provided. However, RTD provides door-to-door service as a reasonable accommodation. Trips must be booked at least one day and up to 3 days in advance; however, RTD also offers subscriptions.

All applicants must qualify for certification under the guidelines established by the Americans with Disabilities Act of 1990, complete a functional evaluation in person, provide a physician's statements to verify disability and must meet one of the following criteria:

- Be unable to get to and from a bus stop or on and off a lift-equipped bus by yourself
- Have a cognitive disability that prohibits your understanding of how to complete bus trips

2.4.3 Vanpooling

Vanpooling is a public transportation option in which commuters, whose residences are geographically clustered, ride together to and from their work sites in a van that is driven by one of the vanpool participants. Typically vanpools make one roundtrip per day and

carry from 5 to 14 riders. Vanpooling offers greater opportunities for increased capacity compared to carpooling and offers a cost-effective alternative to conventional transit in areas of low employment density and longer commute distances. RTD contracts for this service with DRCOG to subsidize the portion of the commute trip within the District. Vanpool service is evaluated based on subsidy per passenger boarding.

2.4.4 SeniorRide and Senior Shopper

SeniorRide Special Events transports groups to a variety of cultural, educational and entertainment events. The Schedule of events is published 3 times a year to the public. Service is available on a first come first served basis. A minimum of 10 passengers per trip is required. Scheduled events that do not generate reservations of at least 2 groups of 10 may be reconsidered as to whether or not to schedule such event(s) during the next 12 months.

SeniorShopper buses have established routes that provide trips to major grocery stores. Service is available Monday through Friday. A minimum of 10 passengers per trip is required.

2.5 Reliability

On-time for fixed-route service is defined as not more than 1 minute early to not more than 5 minutes late. RTD sets annual objectives for on-time performance by class of service and which are reported in the Quarterly Performance Report. [Improved methods for monitoring, identifying the causes and remedying unreliable service are currently in development.]

3. Geometric Design Standards

3.1 Directness of Route

Routes shall be designed to be as direct as possible and to provide maximum accessibility to transit.

- Deviations from a direct path from end-to-end of the route shall account for no more than one-quarter of the end-to-end travel time of the route.
- For a specific deviation, the total additional travel time for all through passengers should not exceed three minutes for each rider boarding or alighting along the deviation.

In mathematical terms, this means that the quantity

$$\frac{P_t * VTT}{P_d} < 3 \text{ minutes}$$

where: P_t = through passengers

VTT = additional vehicle one-way travel time

P_d = passengers served by deviation

3.2 Stop Spacing Standards

Bus routes shall adhere to the following stop spacing standards. Placement also considers: the balance between pedestrian access and route travel time; ADA requirements; adjacent land uses; streetscape conditions and property ownership.

3.2.1 Minimum

- **Local and Regional** collection, residential areas - 600' (8 stops/mile) Commercial areas - 500' (10 stops/mile)
- **Limited** service, limited-stop zone - 2500' (2 stops/mile)

3.2.2 Maximum

- **Local** service, residential and commercial areas – 1,250' (4 stops/mile)
- **Limited** service, residential and commercial areas – 1,250' (4 stops/mile)
- **Limited** service, limited stop zone – 8,000' (1 stop/1.5 miles)

3.3 Roadway Design Goal

New bus routes should *not* be operated along streets that do not meet minimum standards, such as for bus turning radius, pavement strength/loading, lane width, roadway grade, shoulder width on rural roads (for pedestrian waiting and safety) and overhead clearance. Refer to the RTD Bus Infrastructure Design Guidelines and Criteria Section 1 – Transit Access for specific details.

4. Shelters

The minimum warrant for the placement of a shelter is 40 boardings per day at the stop. Stops with the highest average of daily boardings will take top priority for shelter placement. [Revised standards are currently in development and will reference the RTD Bus Infrastructure Design Guidelines and Criteria.]

5. Area Coverage Standards

5.1 Purpose and Application

The purpose of these standards is to define a reasonable level of service to all areas of the District and to help RTD maintain this service level. Since the RTD service area includes many different types of development, and population densities and land use vary widely across the District, it would not be reasonable to expect all areas to support the same level of service. Moreover, different types of service may best meet the needs of different areas, and RTD's resources can be used in a more productive fashion if service can be tailored to the needs of particular areas. Area coverage standards provide guidelines for tailoring service to the needs of communities and help ensure that all areas receive a level of service that is commensurate with their needs.

Levels of service for specific areas also depend on the productivity of existing services. If existing or proposed services cannot meet the productivity standards outlined in Section 2, RTD may choose not to provide the minimum level of service. Financial constraints may also limit RTD's ability to meet the area coverage (or any other) standards.

5.2 Coverage Levels Outside the Denver CBD

The area coverage standards for areas outside the Denver Central Business District (CBD) are based on a combined density measure. This measure adds population and employment to determine potential demand for transportation to and from a particular area. [Attachment B shows the density classifications overlaid with RTD services for the entire District.]

The area coverage standards presented below deal with route spacing. Actual route spacing and service frequency will depend on demand and productivity of existing service in the area.

For use in this document, arterial roadways are defined as follows:

- Traffic flow controlled by traffic signals as opposed to stop signs
- Carry longer distance traffic flow
- Speed limit 30 mph or faster
- Road width two plus lanes in each direction

5.2.1 Minimum Service Levels

Areas with 3-12 residents and employees per acre

- Peak period Park-n-Ride service if either the travel time to the Denver CBD by Express bus or rail, or a bus/rail timed connection, exceeds 20 minutes.
- Call-n-Ride service.

Areas with 12 or more residents and employees per acre:

- Local service on major arterials with pedestrian access within 1/4 mile.
- Peak period, Limited, Express, or Regional service from Park-n-Rides if either the travel time to the Denver CBD by bus, or a bus/rail timed connection, exceeds 20 minutes.

5.2.2 Access-A-Ride - ADA Required Service Area Coverage

Within the District:

49 CFR 37.131 - Service criteria for complementary paratransit.

“(1) Bus.

(i) The entity shall provide complementary paratransit service to origins and destinations within corridors with a width of three-fourths of a mile on each side of each fixed route. The corridor shall include an area with a three-fourths of a mile radius at the ends of each fixed route.

(ii) Within the core service area, the entity also shall provide service to small areas not inside any of the corridors but which are surrounded by corridors.

(iii) Outside the core service area, the entity may designate corridors with widths from three-fourths of a mile up to one and one half miles on each side of a fixed route, based on local circumstances.

(iv) For purposes of this paragraph, the core service area is that area in which corridors with a width of three-fourths of a mile on each side of each fixed route merge together such that, with few and small exceptions, all origins and destinations within the area would be served.

“(2) Rail.

(i) For rail systems, the service area shall consist of a circle with a radius of 3/4 of a mile around each station.

(ii) At end stations and other stations in outlying areas, the entity may designate circles with radii of up to 1 1/2 miles as part of its service area, based on local circumstances.

“(3) Jurisdictional boundaries. Notwithstanding any other provision of this paragraph, an entity is not required to provide paratransit service in an area outside the boundaries of the jurisdiction(s) in which it operates, if the entity does not have legal authority to operate in that area. The entity shall take all practicable steps to provide paratransit service to any part of its service area.”

“Requirements for complementary paratransit do not apply to **commuter bus** ... fixed route bus service, characterized by service predominantly in one direction during peak periods, limited stops, use of multi-ride tickets, and routes of extended length, usually between the central business district and outlying suburbs.”
[§37.121]

6. Transit Access

RTD has guidelines for access to its facilities for pedestrians, bus riders, bicyclists, passenger loading, and parking. The RTD Bus Infrastructure Design Guidelines and Criteria, included here by reference, is intended to be used by RTD in conjunction with local jurisdictions in planning transit access (including projects under construction).

7. Service Guidelines for Special Events and Special Services

7.1 Derivation of Standards

The following guidelines for provision of bus and/or train service to special events are based on prior RTD Board actions and on the public convenience and necessity to:

- Protect neighborhoods from the impact of events which are so large as to overwhelm the surrounding supply of parking, and
- Serve customers by offering adequate service for events which are predictably large enough to overload the normally available transit service, and
- Protect taxpayers by only serving those events that have a predictable level of transit demand great enough to justify the operation of special routes.

7.2 Standards for Events

RTD, within the limits of its budget, will operate special service:

- For events at Invesco Field at Mile High stadium with projected attendance of over 55,000, for which the crowd is expected to all be present at one time.
- For events at Coors Field with projected attendance of over 40,000, for which the crowd is expected to all be present at one time.
- At other venues where the ratio of projected attendance to available on-site parking is 6:1 and for which the crowd is expected to all be present at one time.

This service will not be provided when substantial numbers of the event patrons can be expected to arrive in privately operated or non-profit owned buses or regularly scheduled RTD service.

RTD will provide Express Shuttle service to Invesco Field and Coors Field from selected Park-n-Rides for events described in this section. The General Manager must specifically authorize Park-n-Ride service for other events.

8. Shuttles & Circulators

8.1 Characteristics

Shuttle and circulator routes are not defined as a separate class of service, but are typically proposed to serve specific, local, community-focused needs. Shuttle and circulator routes are generally defined by the following characteristics: short routes, usually less than 5 miles long; operate on local streets and arterials; connect major activity centers; and serve short passenger trip lengths within a single community. Fares must be set according to RTD Fare Policy.

8.2 Guidelines for Success

Several factors are critical to shuttle and circulator success. As a guideline to make informed decisions, the following characteristics must be present and considered.

- A sustained average population density of at least 10 people per acre along the length of the route is a minimum requirement; a critical mass of potential riders is needed to succeed.
- Connects community residences with major activity centers such as colleges, high schools, middle schools, shopping districts (but not auto-centric malls), medical centers, and downtowns that appeal to all market segments (youth, families, seniors) and can serve a variety of trip purposes.
- Transit friendly environment: pedestrian friendly, walkable streets are a minimum; mixed land uses; areas of clustered shopping or employment; public spaces; and bicycle parking/paths.

- To attract spontaneous walk up use, the headway needs to be 15 minutes or less for a service span for the intended markets, typically 6:00 – 18:00 or longer.
- Offers bi-directional service.
- Does not substantially duplicate a service of comparable utility.

9. System-Wide Cost Recovery Standard

The state required system-wide minimum cost recovery ratio is 30 percent. This ratio is calculated by the following formula:

$$\frac{[\text{Farebox Revenues} + \text{Advertising Revenues} + \text{Lease Revenues} + \text{FTA Operating Assistance} + \text{Other Non-Sales Tax Revenues}]}{[\text{Category Costs applied according to RTD Cost Model Memo, June 15, 2010, as updated (See summary below)}]}$$

Cost Model Summary

With the exception of Private Carrier costs, all costs are allocated to routes by one of three methods: hours, miles or vehicles. The RTD Bus Cost Model has five cost categories: Variable/Direct, Variable/Indirect, Private Carrier, Retained Costs and Depreciation. Private Carrier costs are allocated to routes by the number of hours the contractor operates the route, multiplied by the average hourly rate billed for that particular contract, plus the average hourly cost for fuel.

The annual budget and six-year Strategic Budget Plan are evaluated using this cost recovery standard. If the standard is not met, several courses of action may be taken. The RTD Board has adopted a policy of evaluating the fare structure as part of the annual budget process; fares may be changed at that time to provide additional revenue. RTD may also choose to market its services more aggressively to attract more customers and their fares, or RTD may look for revenue from other sources. The productivity standards in Sections 2 and 3 may be used to reduce the costs of providing service while disrupting service to as few passengers as possible.

10. Title VI & Environmental Justice Compliance

RTD follows FTA Circular 4072.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," Chapter 4.4.

Title VI Protected Classes are race, color and national origin.

Environmental Justice Protected Classes are as follows:

1. Minority Populations:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

2. Low-Income Populations - 150% of Federal Poverty Guidelines.

11. Standard for Service for Transit Dependent Persons and To Social Service Destinations

For purposes of these service standards, transit dependent riders are defined as riders who either live in a household which does not own a car or who have a physical or mental disability that prevents the transit patron from driving a car. Social Service destinations are those destinations that are provided as a public service that may not have consistently sufficient ridership to otherwise warrant the establishment or continuation of a route or route segment. Examples of social service destinations would include county court facilities, hospitals, schools, or public institutions which have been situated or constructed in isolated locations prior to the establishment of RTD or following review and comment by RTD of the proposed development plans of such institution or agency, by the appropriate jurisdiction.

11.1 Purpose of the Standard

This standard is intended to provide for consideration of transit dependency in service decisions. This standard does not guarantee a minimum level of service to all transit-dependent riders. However, it will ensure that transit-dependent riders and/or the need to have access to social service destinations are identified and considered when decisions are made to reduce service levels in an area.

11.2 Determination of Transit Dependency

Whenever RTD plans changes to an existing route where there is no alternative service available to meet the area coverage standards in Section 5 such as a change in routing or span of service, transit-dependent riders will be identified through on-board surveys. This survey will ask questions about riders' travel habits and demographics, and it will attempt to identify transit-dependent riders and their destinations.

11.3 Application of Transit Dependency Standard

The applicable minimum productivity standards for a route will be reduced by one-half the percentage of ridership that is defined as transit dependent. Thus, if 60 percent of the riders on a route are transit dependent, the route must achieve 70 percent [100 percent minus (60 percent divided by 2)] of the applicable productivity standards (ridership and economic) in order not to be considered a poor performer.

Applicable ridership standards for fixed route services may be found in Section 2.3, and for non-fixed route services, in Section 2.4.

If the on-board survey reveals that the route does not serve the destinations desired by transit-dependent riders, RTD may restructure the route to improve service and increase ridership. This could include changing the routing or schedule to serve passenger needs. RTD wishes to provide transit dependent riders with service that fits their needs and to provide service to social service destinations when there is even a modicum of recognized demand.

Another consideration to be given in whether or not to eliminate a route with some transit dependent passengers is the impact on required Access-A-Ride services. The Americans with Disabilities Act (ADA) requires that eligible persons with disabilities be provided with paratransit service if they have trip origins and destinations within a defined service area three-fourths of a mile from a non-commuter fixed route. If accessible fixed route service is considered for removal from a portion of the defined paratransit service area, an estimate of the demand for substitute Access-A-Ride service for persons with disabilities who require lift-equipped buses must be completed and a cost-benefit analysis performed for the alternatives (leaving fixed route versus providing Access-A-Ride service).

12. Service Change Process

The following is a description of the steps necessary in developing and implementing service changes, which are typically conducted each year in January, May and September—also called runboards—as required by Board policy and the Collective Bargaining Agreement.

Proposals are derived from a variety of inputs continuously throughout the year including: periodic customer, household and employer surveys; stakeholder meetings; service performance evaluation; and changing demographics and land uses. They are compiled for each runboard and evaluated based on a number of factors, including RTD annual budget, RTD Service Standards, effects on the transit network and on transit dependent markets (Title VI), cost-effective services throughout the District and responsiveness to changes in the communities within RTD. A Board paper is compiled and presented to the Board, stakeholders and public for consideration.

Staff then discusses the proposals with members of the Board, stakeholders and senior staff and coordinates with other staff including Marketing, Operations, Facilities and Finance. Modifications are made as warranted and then the proposals enter the public

engagement process: formally scheduled public hearings; informal presentations upon request; repository for customer input—service.changes@rtd-denver; responses to General Manager and Board Member requests. Upon completion of public engagement, all previous input is compiled and evaluated and revisions to the proposals are made as warranted. A final Board report is prepared with a summary and details of proposed changes and a summary of public hearings and other public input for approval of the Board.

The approved changes then go into a comprehensive production process which includes: schedule creation; bus and operator requirements and assignments; compliance with privatization policy; runcutting and compliance with the Collective Bargaining Agreement; marketing promotions and public relations; bus stop and on-street changes; printed and electronic public information, including maps and timetables; and validation and distribution of all data within the Transit Information Exchange System (TIES).

13. Cost Sharing Policy

13.1 Background

On June 21, 1994, the RTD Board of Directors passed a resolution, Transit Service Cost-Sharing Policy, to provide guidance to RTD staff in responding to the increasing number of requests for new service. This policy authorized the General Manager to pursue cost sharing as a method of providing transit service using RTD revenues and other funds voluntarily pledged by private employers, businesses or local governments; this has resulted in a number of RTD partnerships in demonstrating new services. The following incorporates this experience and provides guidance on the application and limitations of cost-sharing arrangements.

13.2 Guidance

13.2.1 Financial Feasibility

Financial feasibility depends not only on the availability of funds, but also on consideration of fares, cost/revenue allocation and equity.

- Net operating cost (subsidy) needs to be defined so that all partners are treated equitably. Net cost is the total operating cost less farebox revenue and other operating revenues and any grant revenues secured on behalf of the proposed service. The application of grant revenues prior to the net cost sharing allows all partners to participate in the benefits of grant funding.
- Cost-sharing projects need to adopt the RTD fare structure for similar services for reasons of equity. Furthermore, this places all projects on the same revenue basis for calculating net operating cost. Project sponsors may propose a fare that does not follow the RTD fare structure. For these projects the partner is required to fund the full difference in revenue between the comparable RTD fare and the project fare, based on

actual ridership. The adoption of any non-conforming (economically or technically) fare is always subject to Board approval.

- Costs associated with vehicles are addressed project by project. Vehicles can be purchased outright by project sponsors with grant funds or provided from the RTD inventory. Should new vehicles be required, grants should fund their acquisition and the local share split equally by the cost-sharing partners. If no grant funds are used, RTD will limit its share to 10%, half of the usual local share when grant funds are used. If the RTD operates the service and agrees to provide the vehicles from its inventory, capital costs need not be included as part of the project cost unless special accommodations are required.
- Cost-sharing projects are new or expanded transit services and RTD's share must be budgeted out of allocations for new services for the entire District. Thus any partner with expectations for RTD financial or operational participation must first obtain commitment from RTD before applying for project grants. In addition, each project will be subject to the appropriate RTD and DRCOG planning processes, especially as regards estimates of costs, ridership, revenue and other benefits.

13.2.2 Vehicle Availability

RTD may have, with some minor modifications, vehicles readily available to provide the proposed service. In some cases projects require a specialty or significantly modified vehicle that must be acquired, subject to RTD approval for fleet maintenance compatibility. Financing these vehicles is addressed above. Sometimes the availability of operators has been more critical.

13.2.3 Local and Community Support

Local and community entities (e.g., government, employers, businesses and associations) generally initiate cost-sharing transit projects concomitant with other plans and developments in the community. Thus the proposed transit project is designed to address a specific development or perceived need. To advance their project for implementation, an entity such as a city, will offer to share in the net costs of providing the service. RTD needs to be responsive to these requests, but keep them in the context of the needs of the entire District.

- Projects generally have substantial institutional support; however they are subject to the same public scrutiny, for example public hearings, as any other proposed service change. Implementation of any cost-sharing project will continue to be subject to RTD's public review process.
- RTD generally provides 50% of the local share of the net operating and/or capital cost of a project. This cost-sharing ratio may be adjusted in consideration of the District budget and policies.
- Cost-sharing arrangements for each project are of limited duration for which agreed upon performance milestones must be reached (see below). The purpose of the test period is to assess the sustainability of the service and decide RTD's and its partners continuing participation. The test period is typically set at one, two or three years, as appropriate to the project. Performance milestones must be set and evaluated and a recommendation regarding continuation made for each year of the project.

13.2.4 Performance

Cost-sharing services will have clearly defined evaluative criteria agreed upon within the cost-sharing agreement and prior to implementation.

- At a minimum these criteria will include average daily ridership and RTD Service Standards within the appropriate class of service for passenger boardings per hour and subsidy per boarding. Additional criteria may also address issues related to project objectives, such as new riders. State mandated cost recovery may also be considered. Expectations of performance will be laid out in the form of milestones, such as a range or minimum attainment at the end of each year.
- During the first year performance will be assessed to determine if expectations have been met and if continuation of the service is warranted. Often an experimental service will need to be changed to improve performance. As warranted the same assessment will be made in each succeeding year during the test period. This assessment and recommendation regarding continuation will be reported to the RTD Board each year of the test period.
- If the cost-share service meets expectations and RTD Service Standards during the test period, RTD will consider extending the period of its participation and increasing its share of net cost; however, RTD is under no obligation to continuing any service beyond the cost-share agreement, even if it meets Service Standards. If the cost-share service does not perform up to expectations, RTD funding participation in such project will be reduced or discontinued. These decisions are subject to the customary financial and Board review.
- Should RTD decide to discontinue or reduce its funding of the project service, a sponsoring partner may choose to continue its funding by entering into a cost-sharing agreement with RTD. This agreement will specify the service to be provided and its cost, will be annually reviewed for potential renewal and will be subject to all RTD Service Standards, budgeting and public processes.

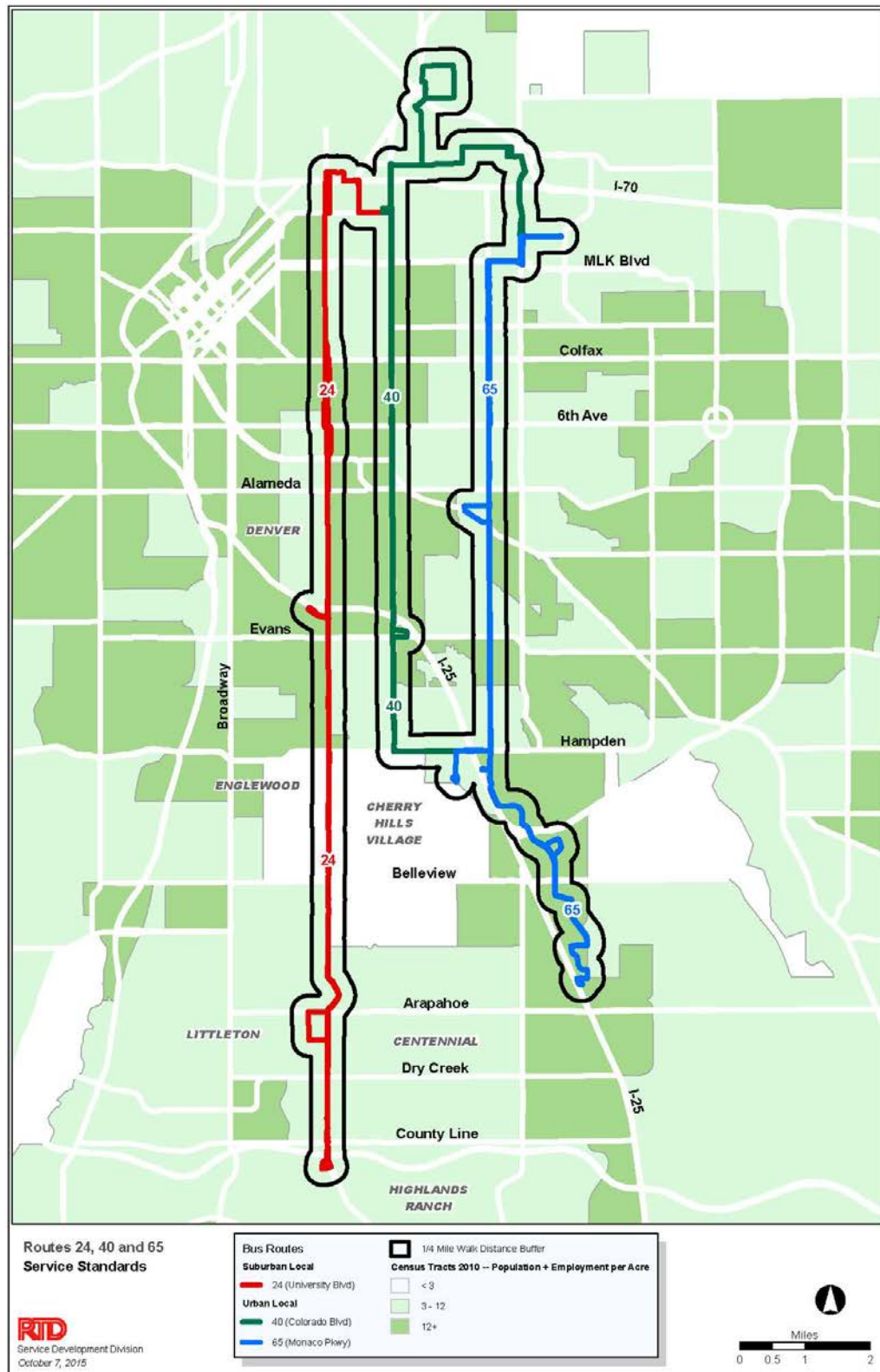
Attachment A Service Classes

Urban & Suburban Service Classes

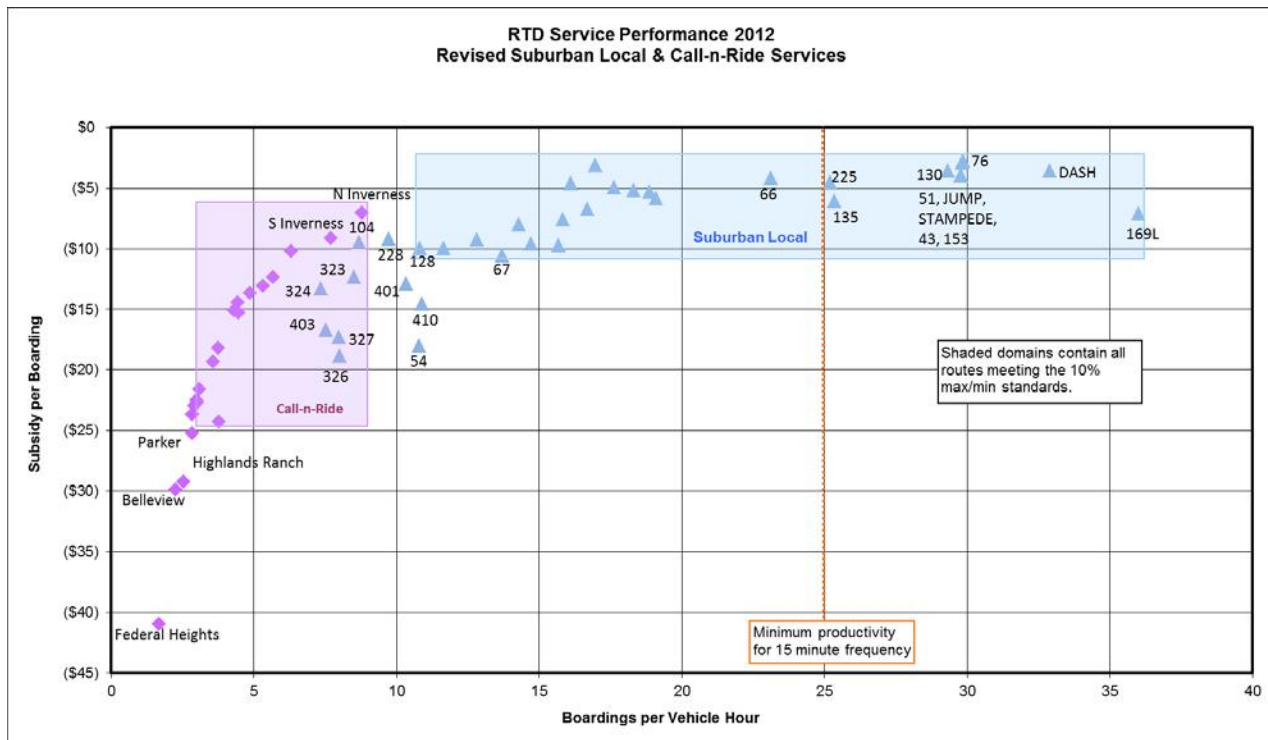
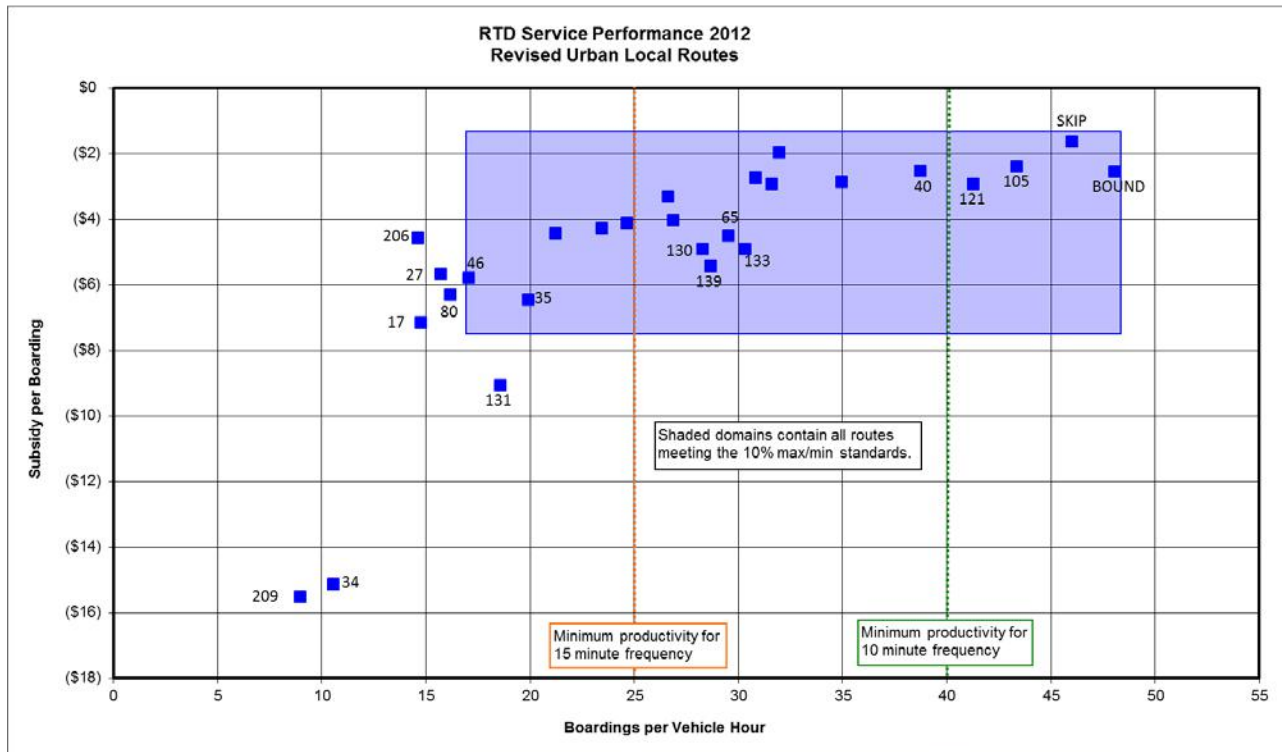
The following table is a GIS analysis of population + employment density per acre. The classifications are taken from the Service Coverage section of these Service Standards. It shows the percentage of route coverage (within ¼ mile buffer) for each classification for all Urban and Suburban routes operating in 2013 and a heavy line demarking the 35% line in the >12/acre column. Green highlight shows those Suburban routes that move into the Urban category and pink highlight shows those Urban routes that move into the Suburban category with this classification system.

Percentage of Route Length By Population + Employment Density (Per Acre)						
Sorted By % > 12, Then % 2 > 12						
ROUTE	NAME	TYPE	Class	% < 3	% 3 < 12	% > 12
34	Platte Industrial	Local	Urban Local	0	4	96
BOUND	30th Street	Local	Urban Local	4	12	84
209	CU / Thunderbird	Local	Urban Local	0	17	83
204	Table Mesa / Moorhead / North 19th	Local	Urban Local	6	16	79
46	South Dahlia	Local	Urban Local	0	25	75
27	Yale Avenue	Local	Urban Local	2	27	71
12	Downing / N Washington	Local	Urban Local	0	32	68
105	Havana Street	Local	Urban Local	1	33	66
11	Mississippi Avenue	Local	Urban Local	0	36	64
3	Alameda Avenue	Local	Urban Local	0	38	62
14	West Florida Avenue	Local	Urban Local	0	39	61
130	Yale / Buckley	Local	Suburban Local	2	37	61
73	Quebec Street	Local	Urban Local	2	37	61
131	East Cliff / Seven Hills	Local	Suburban Local	0	40	60
208	Iris / Valmont	Local	Urban Local	29	12	58
50	Lakes Crosstown	Local	Suburban Local	0	44	56
80	80th Avenue	Local	Suburban Local	0	45	55
21	Evans Avenue	Local	Urban Local	6	40	54
31	Federal Blvd	Local	Urban Local	0	49	51
121	Peoria Street	Local	Urban Local	12	36	51
17	Red Rocks College	Local	Suburban Local	1	53	46
206	Pearl / Eisenhower / Fairview H.S.	Local	Urban Local	13	42	45
35	Hampden Avenue	Local	Urban Local	15	42	43
SKIP	Broadway	Local	Urban Local	30	29	41
65	Monaco Parkway	Local	Urban Local	0	61	39
133	Hampden/Tower	Local	Suburban Local	0	62	38
139	Quincy Avenue	Local	Suburban Local	0	63	37
40	Colorado Boulevard	Local	Urban Local	1	63	36
STAMPEDE	CU East Campus	Local	Urban Local	0	66	34
326	Westside Crosstown	Local	Suburban Local	12	55	34
327	Eastside Crosstown	Local	Suburban Local	15	51	34
153	Chambers Road	Local	Urban Local	10	60	31
89	Stapleton/Anschutz Campus	Local	Suburban Local	0	70	30
51	Sheridan Blvd	Local	Urban Local	0	70	30
45	Montbello / Green Valley Ranch	Local	Urban Local	9	61	30
66	Arapahoe Road	Local	Suburban Local	0	72	28
43	MLK Blvd / Gateway	Local	Urban Local	9	63	28
88	Northglenn/Commerce City/Stapleton	Local	Suburban Local	15	56	28
76	Wadsworth Blvd	Local	Urban Local	6	68	27
205	28th St / Gunbarrel	Local	Urban Local	28	45	27
24	University Blvd	Local	Urban Local	12	63	26
403	Wildcat Crosstown	Local	Suburban Local	12	62	26
135	Smoky Hill Road	Local	Suburban Local	13	63	24
26	West 26th Avenue	Local	Suburban Local	0	77	23
92	92nd Avenue	Local	Suburban Local	1	76	23
67	Ridge Road	Local	Suburban Local	0	78	22
54	Montbello Industrial Park	Local	Urban Local	2	77	21
59	West Bowles	Local	Suburban Local	5	73	21
225	Boulder / Lafayette via Baseline	Local	Urban Local	37	43	21
104	West 104th Avenue	Local	Suburban Local	0	81	19
112	West 112th Avenue	Local	Suburban Local	0	81	19
402L	Highlands Ranch Parkway	LIM	Suburban Local	0	81	19
72	72nd Avenue	Local	Suburban Local	2	79	19
100	Kipling Street	Local	Suburban Local	3	80	17
169L	Buckley / Tower DIA Limited	LIM	Suburban Local	49	34	17
DASH	Boulder / Lafayette via Louisville	Local	Urban Local	35	48	16
JUMP	Boulder / Lafayette via Arapahoe	Local	Urban Local	69	17	14
324	Main Street	Local	Suburban Local	41	47	12
120	120th Avenue / Brighton	Local	Suburban Local	33	56	11
128	Broomfield / Wagon Road	Local	Suburban Local	0	90	10
116L	South Simms Limited	LIM	Suburban Local	32	58	10
401	Ranches Crosstown	Local	Suburban Local	9	83	8
410	Lincoln Ave / Parker	Local	Suburban Local	23	71	6
323	Skyline Crosstown	Local	Suburban Local	2	98	0
77	Ken Caryl Avenue	Local	Suburban Local	17	83	0
228	Louisville / Broomfield	Local	Suburban Local	22	78	0

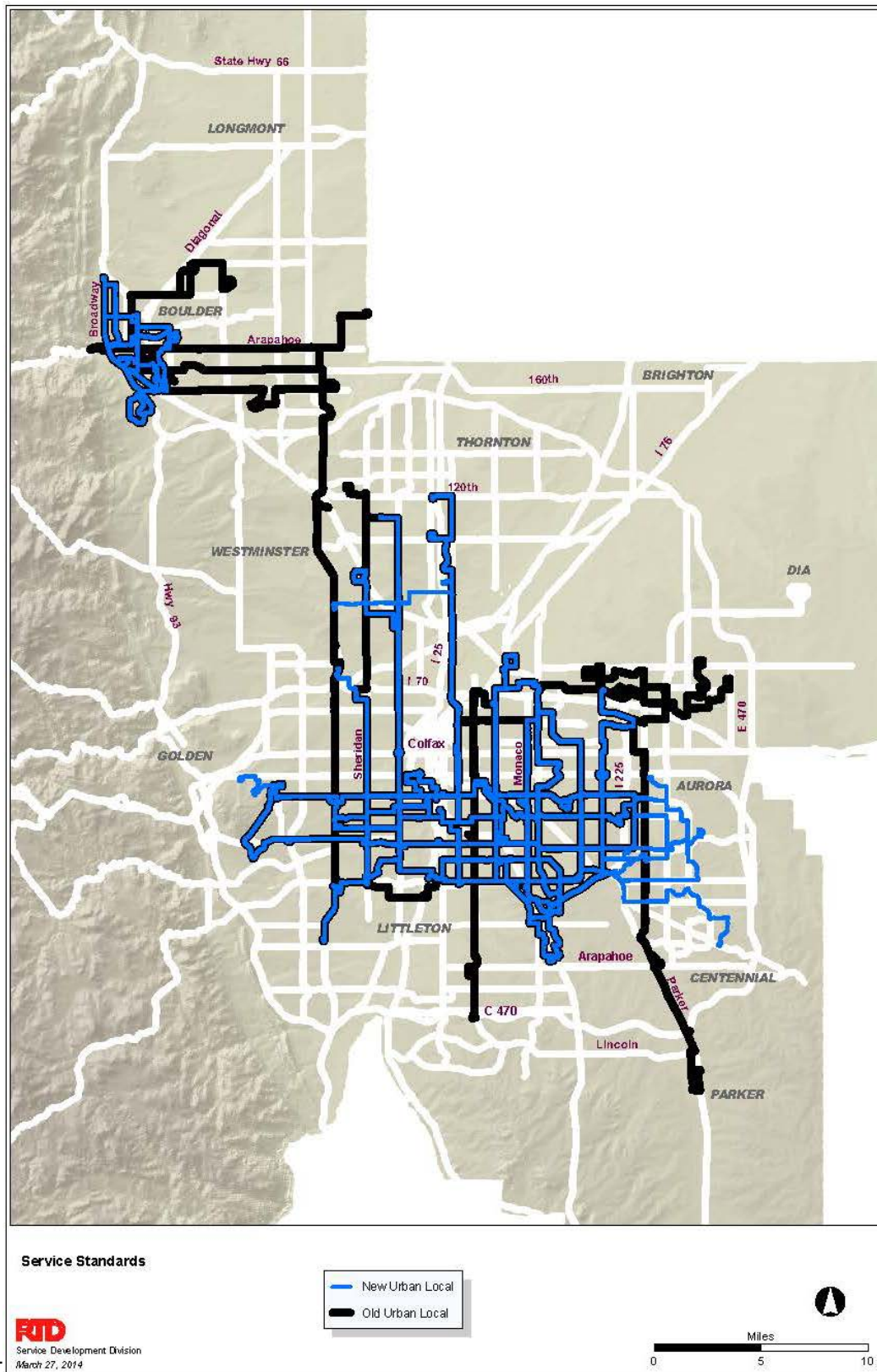
The following map illustrates the application of the density classification for Urban and Suburban routes.



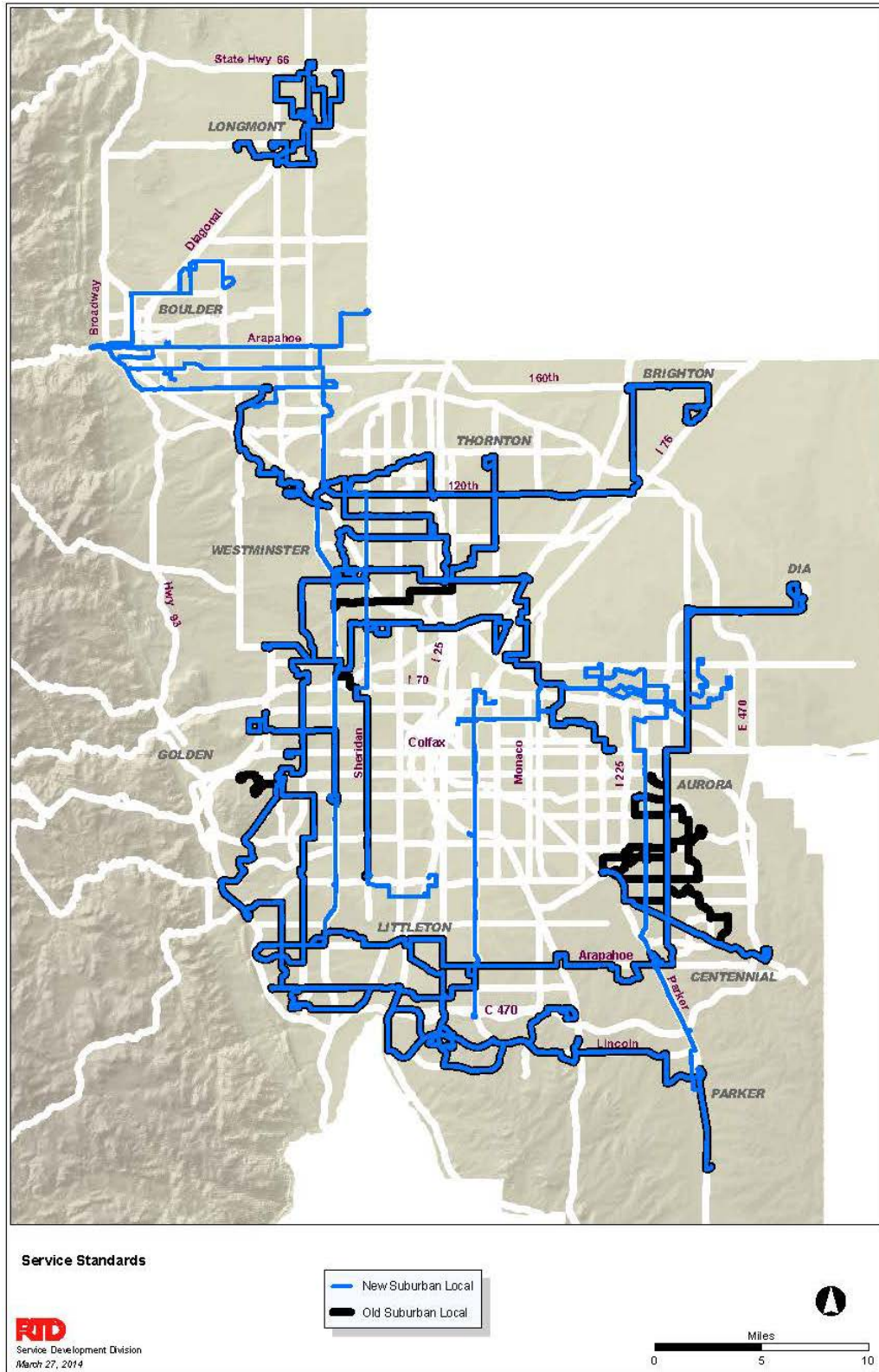
The following two charts depict the Urban and Suburban effectiveness-productivity performance charts with the revised classifications.



The following map depicts the revised Urban routes.

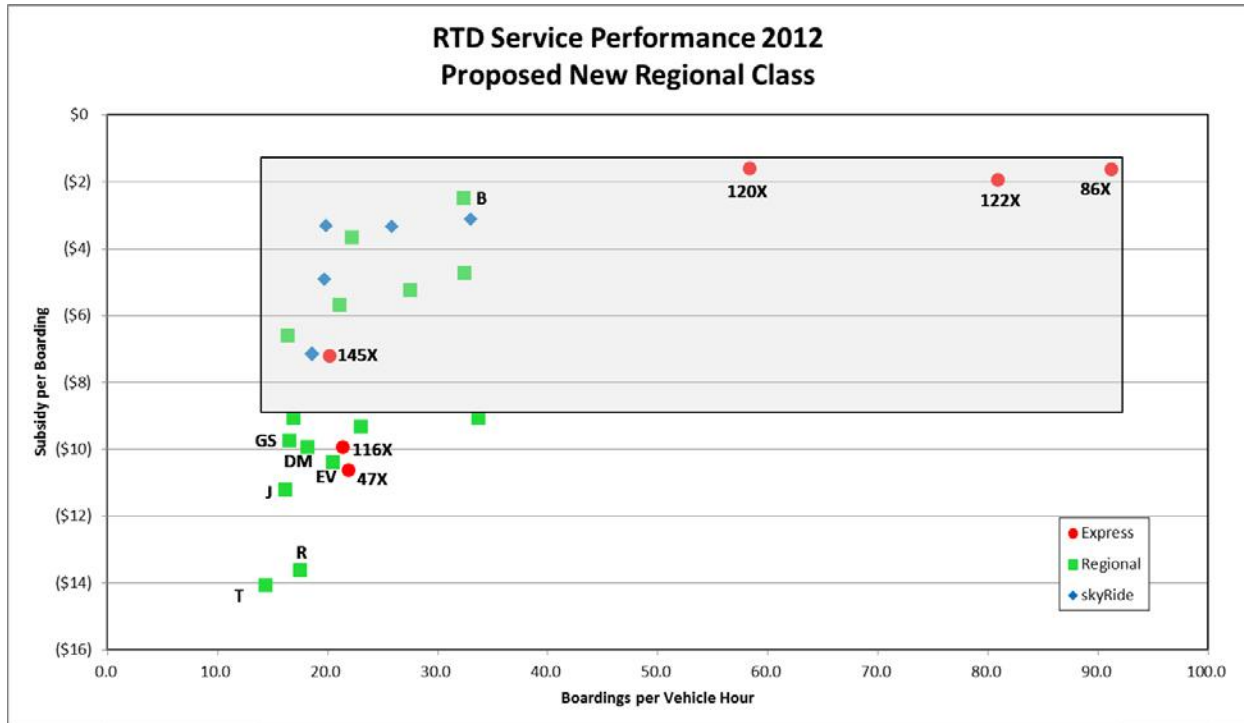


The following map depicts the revised Suburban routes.

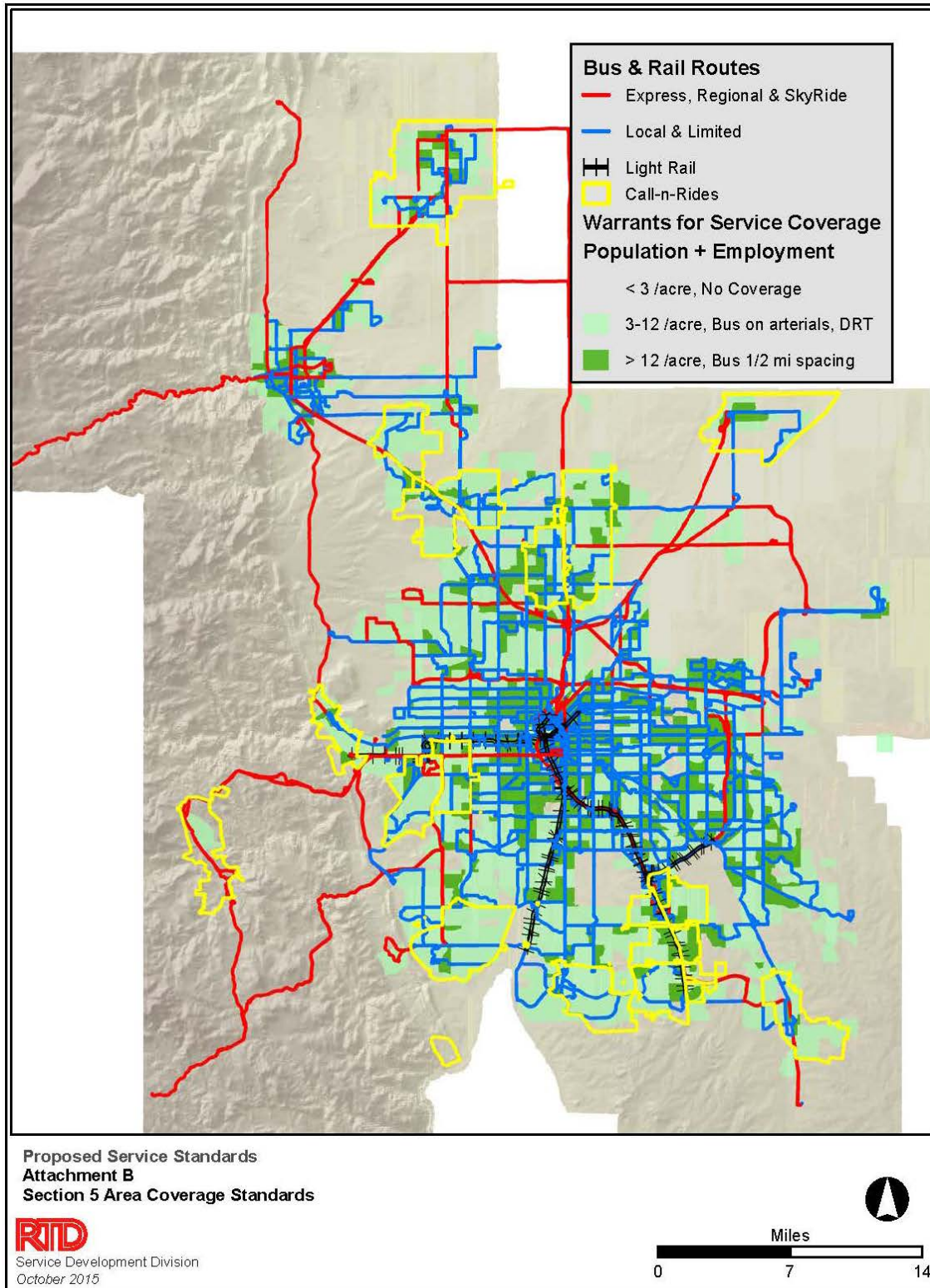


Regional Service Class

The following Express routes will be moved to the Local CBD class: 31X, 40X, 55X, 72X, 80X, 87X and 100X. The chart below shows the performance for the remaining Express routes (labeled) that will be included along with all the current Regional and SkyRide routes in this consolidated class. It should be noted that some Express and SkyRide routes will be discontinued and some Regional routes will be consolidated into the new Flatiron Flyer routes in 2016.



Attachment B Service Coverage



Attachment C Regional Bus Service Performance

Proposed Regional Bus Services Performance 2012										
Route	Standards Class	Fare Revenue	Operating Costs	Total Boardings	In-Service Hours	Net Subsidy	Subsidy per Boarding	Boardings per Hour	O-W Bus Trips	Boardings per Trip
120X	Express	\$1,789,164	\$2,953,831	730,041	12,520	\$1,164,667	\$1.60	58.3	33,343	21.9
86X	Express	\$751,324	\$1,244,803	302,439	3,316	\$493,479	\$1.63	91.2	7,905	38.3
122X	Express	\$1,247,268	\$2,142,957	461,039	5,698	\$895,689	\$1.94	80.9	11,058	41.7
145X	Express	\$30,018	\$134,407	14,508	720	\$104,389	\$7.20	20.2	1,464	9.9
116X	Express	\$176,069	\$851,677	67,983	3,186	\$675,607	\$9.94	21.3	3,045	22.3
47X	Express	\$149,402	\$780,905	59,457	2,712	\$631,503	\$10.62	21.9	2,456	24.2
B/BV	Regional	\$6,414,673	\$10,817,925	1,769,616	54,652	\$4,403,251	\$2.49	32.4	57,874	30.6
BOLT	Regional	\$2,146,681	\$3,891,052	476,791	21,513	\$1,744,371	\$3.66	22.2	23,207	20.5
HX	Regional	\$537,968	\$1,211,900	142,780	4,399	\$673,932	\$4.72	32.5	4,255	33.6
S	Regional	\$281,310	\$611,317	62,924	2,292	\$330,007	\$5.24	27.5	1,813	34.7
N	Regional	\$431,050	\$1,200,009	135,102	6,405	\$768,959	\$5.69	21.1	8,732	15.5
Y	Regional	\$92,820	\$267,016	26,398	1,613	\$174,196	\$6.60	16.4	3,060	8.6
L	Regional	\$1,368,738	\$4,086,452	299,373	17,701	\$2,717,714	\$9.08	16.9	12,779	23.4
P	Regional	\$406,481	\$1,494,279	119,753	3,558	\$1,087,798	\$9.08	33.7	3,570	33.5
CV	Regional	\$580,353	\$1,845,872	135,833	5,908	\$1,265,518	\$9.32	23.0	5,114	26.6
GS	Regional	\$369,837	\$1,509,481	117,115	7,094	\$1,139,644	\$9.73	16.5	5,610	20.9
DM	Regional	\$255,173	\$1,079,129	83,016	4,569	\$823,955	\$9.93	18.2	3,032	27.4
EV	Regional	\$606,910	\$1,887,812	123,277	6,017	\$1,280,902	\$10.39	20.5	4,873	25.3
J	Regional	\$248,013	\$857,254	54,268	3,361	\$609,241	\$11.23	16.1	2,550	21.3
R	Regional	\$274,592	\$1,506,740	90,419	5,163	\$1,232,148	\$13.63	17.5	4,335	20.9
T	Regional	\$114,424	\$682,408	40,408	2,809	\$567,983	\$14.06	14.4	1,530	26.4
AT	skyRide	\$2,276,965	\$4,078,735	578,007	17,509	\$1,801,770	\$3.12	33.0	23,132	25.0
AB	skyRide	\$2,199,099	\$3,360,737	350,883	17,633	\$1,161,638	\$3.31	19.9	13,797	25.4
AS	skyRide	\$2,630,993	\$4,301,139	499,496	19,343	\$1,670,146	\$3.34	25.8	39,163	12.8
AF	skyRide	\$2,375,306	\$4,870,481	506,006	25,619	\$2,495,175	\$4.93	19.8	18,968	26.7
AA	skyRide	\$815,558	\$2,207,279	194,817	10,496	\$1,391,721	\$7.14	18.6	14,163	13.8
Subtotal	skyRide	\$28,570,190	\$59,875,595	7,441,749	265,807	\$31,305,405	\$4.21	28.0	310,828	23.9
Standard Deviation							\$3.72	19.2		8.2
Min/Max at 10% or better: Average $\pm 1.28 * \text{Std Dev}$							\$8.97	3.4		13.5
Min/Max at 25% or better: Average $\pm .67 * \text{Std Dev}$							\$6.70	15.1		18.5

Attachment D Crowding Report Examples

Regional Transportation District

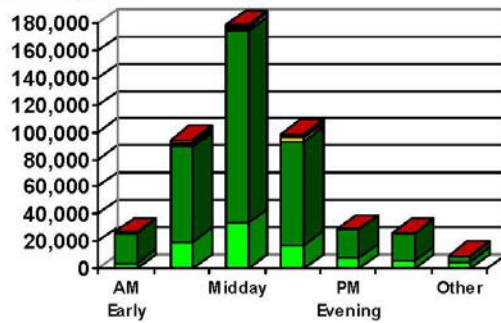
Ridecheck Plus

LOS - Crowding by Time Period

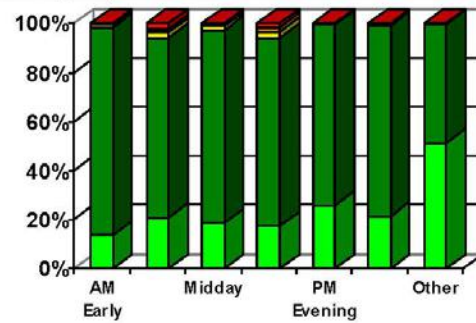
Rt 15L; Jan15 (Weekday); Crowding

Time Period	Level of Service, Passengers					Boardings	Level of Service, Trips					Per Trip	
	A	B	C	D	E		A	B	C	D	E	Trips	Standing Seats Area (sq ft)
AM Early	3,586	22,427	305	38	63	26,419	184	538	50	2	2	776	55
AM Peak	19,524	69,690	1,867	1,144	2,368	94,593	1,021	1,541	277	61	77	2,977	55
Midday	33,344	141,183	2,839	1,048	689	179,103	1,744	3,330	454	57	24	5,609	55
PM Peak	17,242	76,206	2,524	1,934	1,289	99,195	914	1,705	355	101	44	3,119	55
PM Evening	7,452	21,460	184	0	0	29,096	370	544	32	0	0	946	55
PM Late	5,548	20,244	104	76	0	25,972	286	510	22	4	0	822	55
Other	4,857	4,601	4	18	0	9,480	249	119	1	1	0	370	55
Total	91,553	355,811	7,827	4,258	4,409	463,858	4,768	8,287	1,191	226	147	14,619	55
Standing	19.7%	76.7%	1.7%	0.9%	1.0%		32.6%	56.7%	8.1%	1.5%	1.0%		

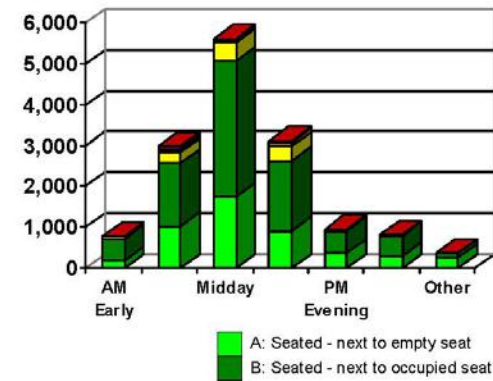
Passengers



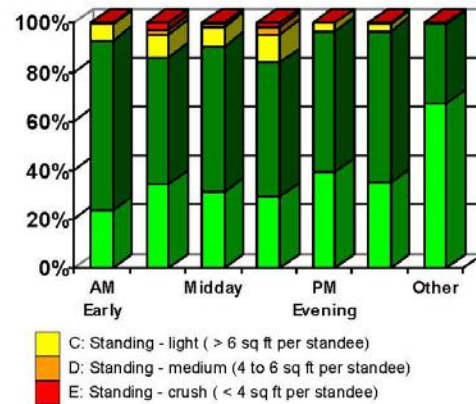
Passengers, % of Total



Trips



Trips, % of Total



Crowding in accordance with TCRP Report 113, "Using Archived AVL-APC Data to Improve Transit Performance and Management"

Crowding determined at maximum load point

03-Dec-15

Page 1 of 1

Attachment D continued

Regional Transportation District

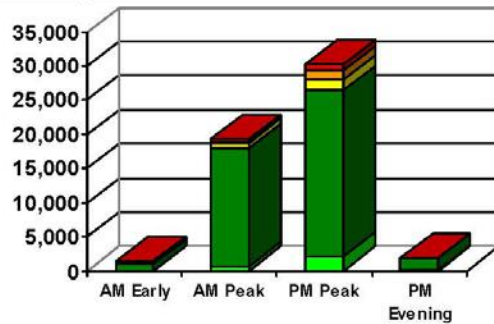
Ridecheck Plus

LOS - Crowding by Time Period

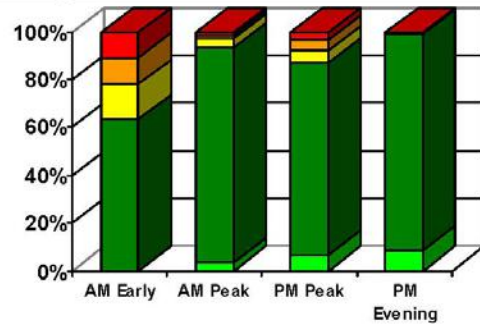
Rt 122X; Jan15 (Weekday); Crowding

Time Period	Level of Service, Passengers					Boardings	Level of Service, Trips					Per Trip		
	A	B	C	D	E		A	B	C	D	E	Trips	Seating Area (sq ft)	Standing
AM Early	0	924	222	160	158	1,464	0	8	21	8	6	43	56	89
AM Peak	670	17,233	816	242	253	19,214	35	358	132	13	9	547	55	89
PM Peak	2,066	24,326	1,519	1,362	1,009	30,282	110	455	215	72	34	886	55	90
PM Evening	161	1,686	19	0	0	1,866	9	40	3	0	0	52	55	91
Total	2,897	44,169	2,576	1,764	1,420	52,826	154	861	371	93	49	1,528	55	90
	5.5%	83.6%	4.9%	3.3%	2.7%		10.1%	56.3%	24.3%	6.1%	3.2%			
Standing				10.9%						33.6%				

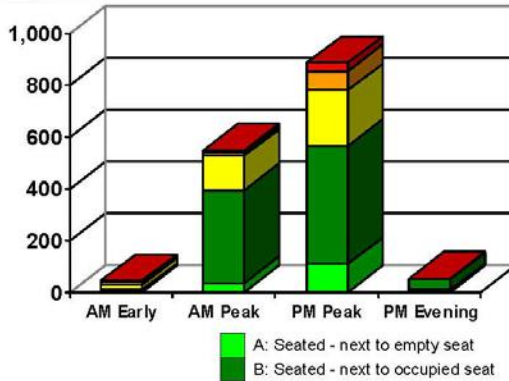
Passengers



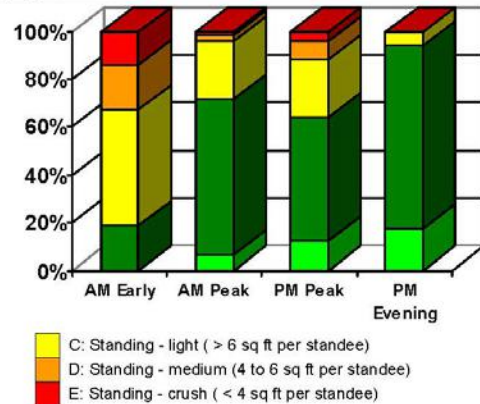
Passengers, % of Total



Trips



Trips, % of Total



Crowding in accordance with TCRP Report 113, "Using Archived AVL-APC Data to Improve Transit Performance and Management"

Crowding determined at maximum load point

03-Dec-15

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Attachment J

MyRide Fare Equity Analysis, with Documentation of Board Approval

Title VI Fare Equity Analysis

MyRide Stored Value Discount Proposed Change

May 2022

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Executive Summary: MyRide Stored Value Discount Changes

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, RTD conducts an equity analysis any time fare changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The proposal to eliminate the discounts on MyRide Stored Value (Full-fare and Discount MyRide card) calls for such an analysis prior to the board taking action.

Methodology

RTD's Title VI Program outlines the agency's Disparate Impact and Disproportionate Burden policies, as well as the way in which RTD conducts fare equity analyses. In the case of the proposed fare product discount elimination, the analysis aimed to answer one main question: **does eliminating the MyRide Stored Value (SV) \$0.20/\$0.10 discount disproportionately impact minority and low-income riders?** To answer this question, staff utilized data from the 2019 RTD Customer Satisfaction Survey to identify any potential disparities in the proposed fare change.

Findings – 2019 Survey Data

All MyRide full-fare and discount customer populations are expected to see an increase in the average fare. However, the proposed fare changes are expected to have a lesser impact on minority and low-income customers, and a greater impact on non-minority and higher income customers. In no cases do the changes in average fare reach or exceed RTD's Disparate Impact or Disproportionate Burden thresholds.

Disparate Impact Analysis (Minority Customers)

The analysis found that minority customers are expected to experience a slightly smaller average fare increase than non-minority customers and an even smaller increase compared to all customers. This suggests the potential impacts of the fare change are more likely to be borne by non-minority and all customers as a whole. Therefore, the proposal to eliminate the full-fare and discount MyRide SV discount does not present a Disparate Impact.

Disproportionate Burden Analysis (Low-income Customers)

The analysis found that low-income customers are expected to experience a slightly smaller average fare increase than higher income customers and even a smaller increase compared to all customers. This suggests the potential impacts of the fare change are more likely to be borne by higher income and all customers as whole. Therefore, the proposal to eliminate the full-fare and discount MyRide SV discount does not present a Disproportionate Burden.

Considerations – MyRide Card Sales

A review of the MyRide card sales reports further suggests minimal impacts due to the overall low demand for this fare product. In fact, the MyRide Stored Value accounts for 1.1% of total fare revenue in 2021 and 1.5% of total fare revenue in 2020. Furthermore, MyRide Stored Value \$0.20/\$0.10 discount sales have dropped 80% and 56% (respectively) from January 2020 to December 2021.

Introduction

Background

RTD will propose the elimination of the MyRide Store Value \$0.20/\$0.10 discount. RTD introduced its current card-based smart card system in 2013. Initially, this system was only used for institutional passes for employers, neighborhoods, and colleges. RTD introduced the first method of electronic fare collection for use by individual customers in 2016, the MyRide stored value smart card. On initial implementation, customers could purchase and reload MyRide cards at RTD's sales outlets. Additional sales channels (two major grocery store chains and online accounts) were added in late 2016 and in 2017.

Dating back to the 2016 fare structure, a per-trip discount (\$0.20 per full fare 3-hour trip; \$0.10 per half-fare 3-hour trip) as well as free transfers were included to incentivize the use of electronic fare collection. However, due to delays in implementation, RTD continued to offer free transfer on all 3-hour tickets and continued to offer paper 10-ride ticket books with a similar per-trip discount. These policies were continued in the current fare structure, which was implemented in 2019. However, the 2019 fare structure does not include a per-trip MyRide price incentive for the two new discounts that were created then, a separate youth discount and an income-based fare discount through RTD's then-new LiVE program. The \$0.20/\$0.10 discount per 3-hour trip only applies to trips with full-fare MyRide cards and half-fare "Discount MyRide" cards for seniors, individuals with disabilities, and Medicare card holders.

In late 2017, RTD added a new method of electronic fare collection, mobile ticketing, which was very well received and now accounts for 19.4% of RTD's fare revenue based off the February 2022 report. In contrast, MyRide never fully took off due to inconveniences caused by technical limitations, especially the fact that funds loaded online cannot be used for travel until the next day or later. At this time, RTD's current card-based system is end-of-life. RTD will replace it by adding account-based ticketing (ABT) functionality and the option to use smart cards to the existing mobile platform. Customers will be able to utilize the system through the RTD mobile app or physical smart cards. In addition to the fact that decommissioning the old system is a technical necessity, the new system offers several customer advantages. The new system includes real-time reflection of account balance, reloading, and fare payments, as well as the option for fare capping ("best fare"). Fare capping provides flexibility for customers to take advantage of the pricing and convenience of RTD's day and monthly passes without having to decide on a particular fare product in advance and without having to pay the full amount in advance.

The current MyRide cards and current MyRide stored value are not compatible with the new system. RTD will have to convert the current stored value to stored value in the new system, but due to the incompatibility, this process will require some manual work and customers will have to take some action. In order to make this process as smooth and timely as possible for customers, RTD is proposing to discontinue the sale and reload of MyRide cards and MyRide stored value in June, ahead of the installation of the new validators that starts at the end of July 2022, which will render the current MyRide cards unusable.

Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD) mission to provide mass transit service in the Denver Metro Area. An equitable mass transit system fairly distributes the benefits and adverse effects of transit service without regard for race, color, national origin, or low-income status. This

principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 pertaining to environmental justice.

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

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency “shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

The Federal Transit Administration’s (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Environmental Justice. In this circular, the FTA requires RTD to evaluate, prior to implementation, any and all fare changes to determine whether those changes will have a disproportionately negative impact on minority or low-income populations.

This equity analysis report has been prepared to document the proposed fare change and to identify potential impacts to the communities RTD serves.

RTD’s Title VI Equity Analysis Policies

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a Disparate Impact Policy and a Disproportionate Burden Policy. Collectively, these policies provide foundational requirements for evaluating fare change proposals for equity and compliance with Title VI. These policies and their applicable thresholds are listed below:

1. **Disparate Impact Analysis:** the difference in the adverse effects absorbed by minority persons as a result of any fare price change or the average of multiple fare changes shall not be greater than or less than 5% of impacts absorbed by the overall ridership. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.
2. **Disproportionate Burden Analysis:** the difference in the adverse effects absorbed by low-income persons as a result of any fare price change or the average of multiple fare changes shall not be greater than or less than 5% of impacts absorbed by the overall ridership. A low-income population is a group of households who are at or below 150 percent of the Department of Health and Human Services Poverty Guidelines.

If a proposed fare change results in a disparate impact or a disproportionate burden, RTD will consider modifying the proposal to avoid, minimize, or mitigate potential adverse effects. RTD will then analyze the modification and make sure it removed the potential disparate impact or disproportionate burden. If a less discriminatory option cannot be identified and RTD can demonstrate a substantial legitimate justification for the proposed fare change, the FTA may allow RTD to proceed with the proposed change.

Proposed Fare Change

Description of Changes

The fare change proposes to eliminate the discount on MyRide Stored Value transactions. Currently, Full Fare MyRide Stored Value transactions receive a \$0.20 discount over the applicable 3-Hour Pass fare, while Discount MyRide Stored Value transactions receive a \$0.10 discount over the applicable 3-Hour Pass fare. Youth and LiVE program customers receive no discount when using MyRide Stored Value. The \$0.20/\$0.10 discount is fixed across all Service Types (Local, Regional, Airport). The decision for not integrating MyRide Stored Value \$0.20/\$0.10 discount in the account-based ticketing fare system are shown in Table 1.

Table 1: Considerations for Removing MyRide Store Value \$0.20/\$0.10 discount

Consideration	Detailed Explanation
Customer Experience	The current MyRide Stored Value product is a single-trip product. Fare is deducted from the stored value balance each time a customer taps their card on a bus or rail platform reader for the first boarding of a trip and when transferring to a higher-priced service level. (Note that no fare is deducted for taps (transfers) at the same service level within 3 hours of the first tap.) As a result, the customer cannot purchase daily or monthly passes (period passes) on the MyRide card, affording potential savings. Additionally, single trips purchased on a MyRide card do not accumulate to period passes, leading some customers to pay more than if they had purchased a day or monthly pass.
Technology	Eliminating the MyRide Stored Value discount allows for a seamless transition from the current card-based to the new Account-Based Ticketing system by simplifying fare calculations. Moreover, RTD's fare structure with multiple service types and fare levels requires creating and maintaining a more complex algorithm to calculate and track fares.
Customer Service	Issuing product exchanges is cumbersome because of the inconsistent pricing between other fare products (paper and mobile tickets) and the MyRide single trip. In addition, the lack of a one-to-one exchange between products results in customer confusion and additional manual work for Customer Care staff.
Fare Capping ¹	Fare Capping is an electronic fare collection system feature that calculates and charges single trips and automatically accumulates single trips into period passes. Fare Capping increases period pass affordability by allowing customers to purchase period passes in smaller increments. As a result, customers have peace of mind that they are paying the best fare available.

Analysis

Methodology

For proposed changes that would increase or decrease the fares on the entire system, on certain transit modes, or by fare payment type or fare media, RTD shall analyze any available information generated from passenger surveys. Passenger survey analysis indicates whether minority and/or low-income customers are disproportionately more likely to use the mode of service, payment type, or payment media subject to the fare change.

The typical measure of Disparate Impact or Disproportionate Burden involves a comparison between the proportion of persons in the protected class (i.e., minority or low-income populations) who are adversely

¹ Fare capping will be included in the Systemwide Fare Study and Equity Analysis.

affected by the service or fare change and the proportion of persons not in the protected class (i.e., non-minority or non-low-income) who are adversely affected.²

Based on the Federal Guidance and the RTD's Title VI Policies, RTD shall—

- (i) Determine the number and percent of users of each fare media being changed;
- (ii) Review fares before the change and after the change;
- (iii) Compare the differences for each particular fare media between minority users and overall users; and
- (iv) Compare the differences for each particular fare media between low-income users and overall users.³

A fare equity analysis compares the existing fare to proposed changes and calculates the absolute change as well as the percent change. Using the Disparate Impact and Disproportionate Burden Threshold, a determination will be made as to whether the fare change will result in adverse effects that are disproportionately borne by the minority or low-income populations, respectively. The thresholds are also used to assess whether the proposed changes disproportionately benefit non-minority or non-low-income populations.

Within this report, an **Average Fare Analysis** is undertaken to assess the effects of the proposed fare changes on the average fare paid per boarding. The Average Fare Analysis determines whether the changes disproportionately adversely impact minority or low-income customers or whether non-minority or non-low-income customers disproportionately benefit from the changes.

Average Fare Analysis

The Average Fare Analysis for the elimination of the MyRide Stored Value discount was undertaken using data from calendar year 2019, and therefore does not reflect the changes in ridership resulting from the ongoing COVID pandemic. Calendar year 2019 ridership and revenue data formed the basis for the analysis as it aligns with the 2019 RTD Customer Satisfaction Survey (2019 CSS), the most recent customer survey data available for fare payment and demographic information. The only changes considered in the Average Fare Analysis are those associated with the changes in the average fare per boarding due to pricing changes; the Average Fare Analysis does not assume any ridership changes due to application of fare elasticities.

Data Sources

Systemwide ridership and fare revenue data for 2019 used in the Average Fare Analysis was retrieved from the National Transit Database (NTD). Only ridership and fare revenue for fixed route services was considered; Access-a-Ride and other Demand Response services ridership and revenue was excluded.

MyRide Stored Value transactions for calendar 2019 were retrieved from RTD's Business Intelligence platform. Within the data warehouse, transactions are delineated by Rider Category (e.g., Full Fare,

² Federal Circular: C4702.1B Chap IV-10

³ Federal Circular C4702.1B Chap. IV-19

Discount, Youth, LiVE) and Service Type (Local, Regional, Airport). With some additional analysis, MyRide Stored Value boardings could be classified as first boardings, free transfers and upcharges. With this level of delineation, MyRide Stored Value fare revenue could be calculated.

For customer demographic data, the analysis relied on the 2019 CSS, the most recent comprehensive, on-board customer survey undertaken by RTD that provides information on customer demographics and fare payment. The 2019 CSS was undertaken by BBC Research, a contractor hired by RTD, whose research surveyors conducted 3,811 surveys.

RTD's 2017 Customer Satisfaction Survey (2017 CSS) was considered for use in the analysis, given the much larger sample of completed surveys (9,936). However, the 2017 CSS has very limited customer response data from those customers using MyRide Stored Value due to the timing of when MyRide Stored Value was introduced and when the 2017 CSS was undertaken. Because of this, the 2019 CSS was used for customer demographic data.

Customer Satisfaction Survey Assumptions

The 2019 CSS, while being the most recent and comprehensive on-board survey undertaken by RTD, does have some limitations. Low response rates for MyRide Stored Value customers on certain Service Types and by certain Rider Categories created some challenges. The Average Fare Analysis attempts to address the limitations of the data by aggregating together the demographics for some MyRide Stored Value customers.

The following demographic assumptions were used in the Average Fare Analysis:

- Demographics for Regional MyRide Stored Value were aggregated with the demographics for Airport MyRide Stored Value, due to too few survey responses.
- Demographics for Seniors (65+) and Individuals with Disabilities were aggregated together, due to both groups paying the same fare rates and experiencing identical pricing changes with the proposed elimination of the MyRide Stored Value discount.

Racial/Ethnicity Assumptions

For purposes of the Fare Equity Analysis, minority populations are those who have not identified themselves as "Caucasian/White - not of Hispanic origin" on the 2019 CSS. The analysis did not include those who refused to respond to the racial/ethnicity question. The racial/ethnicity categories in the survey include: African American/Black, Asian/Pacific Islander, Caucasian/White - not of Hispanic origin, Hispanic/Latino, Native American/Indian, and Other (please specify).

Income Assumptions

For purposes of the Disproportionate Burden Policy, RTD defines low-income populations as those whose household income is at or below 150% of the U.S. Department of Health and Human Services (HHS) Poverty Guidelines. To align with the 2019 CSS, the 2019 HHS Poverty Guidelines were used to determine which populations would be considered low-income.

Table 2 provides the 2019 U.S. HHS Poverty Guidelines and the corresponding RTD low-income definitions by household size. Because the 2019 CSS asked both household income and household size, the Fare Equity Analysis was able to use household size and income to categorize each individual survey respondent accurately using U.S. HHS Poverty Guidelines. Table 3 presents the income categories used in the 2019 CSS. Because the 2019 CSS income categories are presented as ranges, all respondents within the income ranges that corresponded to the 150% HHS Poverty Guidelines for income and household size were identified as low-income. This may overstate the low-income population somewhat, but represents the most inclusive low-income definition. The analysis did not include those survey respondents who refused to respond to either of the household income and household size questions, as they could not be properly categorized.

Table 2: 2019 HHS Poverty Guidelines

Persons in Family/Household	Poverty Guideline	150% of Poverty Guideline
1	\$12,490	\$18,735
2	\$16,910	\$25,365
3	\$21,330	\$31,995
4	\$25,750	\$38,625
5	\$30,170	\$45,255
6	\$34,590	\$51,885
7	\$39,010	\$58,515
8	\$43,430	\$65,145
For families/households with more than 8 persons:	Add \$4,420 for each additional person	Add \$6,630 for each additional person

Table 3: 2019 Customer Satisfaction Survey Income Categories

2019 Customer Satisfaction Survey Income Categories	
Up to \$22,499	\$54,500 - \$63,499
\$22,500 - \$30,499	\$63,500 - \$70,499
\$30,500 - \$38,499	\$70,500 - \$78,499
\$38,500 - \$46,499	\$78,500 or more
\$46,500 - \$54,499	

Average Fare Analysis Findings

The Average Fare Analysis uncovered no Title VI equity concerns using RTD's Board adopted Title VI Policies. While elimination of the MyRide Stored Value discount would result in a fare increase for some populations, the systemwide change resulted in a 0.14% increase in the average fare. While all customer populations are expected to see an increase in the average fare, the proposed fare changes are expected to have a lesser impact on minority and low-income customers, and a greater impact on non-minority and

higher income customers. In no cases do the changes in average fare reach or exceed the RTD's Disparate Impact or Disproportionate Burden thresholds. As such, no mitigations are recommended to proceed with the implementation of the proposed fare changes based on the Average Fare Analysis.

The Average Fare Analysis provides an overview of the proposed fare changes. **Appendix A** provides the detailed tables that provide the average fare change by minority and low-income status and by specific fare payment method. The tables include the absolute and percentage change between existing and proposed fares, and the proportion of minority and low-income customers that would be affected by each fare change.

Table 4 provides the systemwide analysis comparing the average fare for minority and non-minority customers to all customers. For minority customers, the average fare would increase from \$1.434 to \$1.436, a 0.09% increase. For non-minority customers, the average fare would increase from \$1.444 to \$1.446, a 0.16% increase. For all customers, the average fare would increase from \$1.441 to \$1.443, a 0.14% increase. The percentage point difference between the percentage change for minority customers and non-minority customers is -0.08%, indicating that while both groups would experience an increase in their average fare, minority customers are expected to experience a slightly smaller increase than non-minority customers as a result of the proposed fare change. Additionally, the difference between Minority and All Customers is even smaller at -0.05%. Applying this difference in average fare changes to RTD's Disparate Impact threshold, the fare change would not represent a Disparate Impact on minority customers.

Table 4: Average Fare Change for Minority Customers

	All Customers			Minority Customers			Non-Minority Customers		
	Number of Customer Boardings	Existing Fare Revenue	Proposed Fare Revenue	Number of Customer Boardings	Existing Fare Revenue	Proposed Fare Revenue	Number of Customer Boardings	Existing Fare Revenue	Proposed Fare Revenue
Total	104,028,500	\$149,860,000	\$150,067,716	35,061,718	\$50,294,158	\$50,337,931	68,966,782	\$99,565,842	\$99,729,785
Average Fare		\$1.441	\$1.443	Average Fare	\$1.434	\$1.436	Average Fare	\$1.444	\$1.446
% Change in Average Fare			0.14%	% Change in Average Fare		0.09%	% Change in Average Fare		0.16%
Difference between Protected and Non-Protected Populations						-0.08%	*Values may not match exactly, due to rounding		
Difference between Protected and All Populations						-0.05%	*Values may not match exactly, due to rounding		

Table 5 presents the systemwide analysis comparing the average fare for low-income customers to non-low-income customers. For low-income customers, the average fare would increase from \$1.431 to \$1.432, a 0.07% increase. For non-low-income customers, the average fare would increase from \$1.444 to \$1.446, a 0.16% increase. For all customers, the average fare would increase from \$1.441 to \$1.442, a 0.14% increase. The percentage point difference between the percentage change for low-income customers and higher income customers is -0.10%, indicating that while both groups would experience an increase in their average fare, low-income customers are expected to experience a slightly smaller increase than higher income customers as a result of the proposed fare change. Additionally, the difference between low-income and all customers is even less at -0.07%. Applying this difference in

average fare changes to RTD's Disproportionate Burden threshold, the fare change would not represent a Disproportionate Burden on low-income customers.

Table 5: Average Fare Change for Low-Income Customers

	All Customers			Low-Income Customers			Non Low-Income Customers		
	Number of Customer Boardings	Existing Fare Revenue	Proposed Fare Revenue	Number of Customer Boardings	Existing Fare Revenue	Proposed Fare Revenue	Number of Customer Boardings	Existing Fare Revenue	Proposed Fare Revenue
Total	104,028,500	\$149,860,000	\$150,067,716	27,523,569	\$39,387,084	\$39,413,525	76,504,931	\$110,472,916	\$110,654,191
Average Fare	\$1.441	\$1.443	Average Fare	\$1.431	\$1.432	Average Fare	\$1.444	\$1.446	\$1.446
% Change in Average Fare	0.14%	% Change in Average Fare	0.07%	% Change in Average Fare	0.16%	% Change in Average Fare	0.16%	% Change in Average Fare	0.16%
Difference between Protected and Non-Protected Populations						-0.10%	*Values may not match exactly, due to rounding		
Difference between Protected and All Populations						-0.07%	*Values may not match exactly, due to rounding		

Fare Change Equity Analysis Conclusions

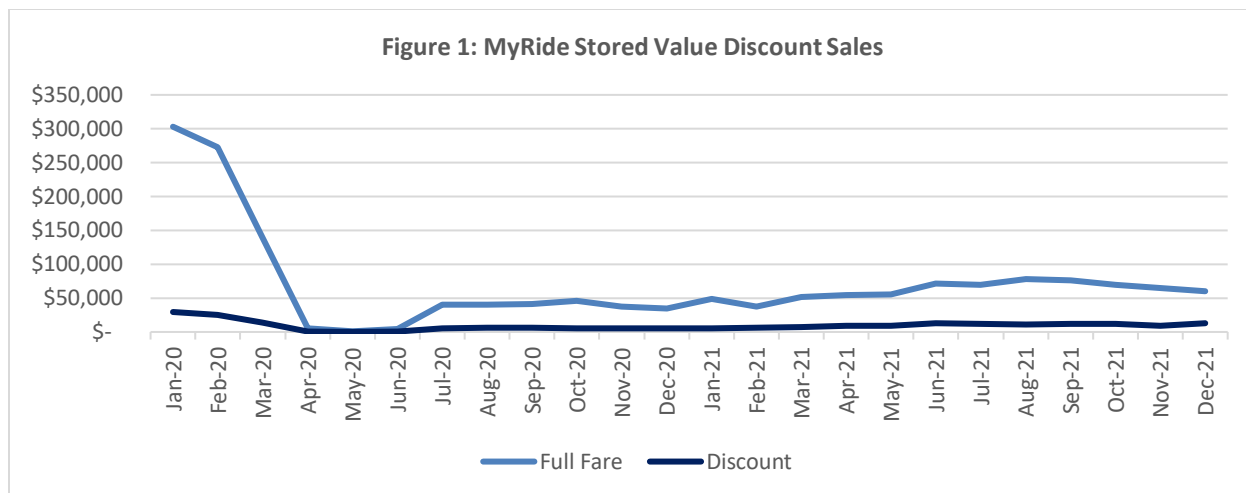
The proposed fare changes required a fare equity analysis to identify any potential disparate impacts on minority riders and/or disproportionate burden on low-income riders. The technical analysis using survey data found:

- No potential disparate impact on minority riders associated with the MyRide Stored Value discount elimination
- No potential disproportionate burden on low-income riders associated with the MyRide Stored Value discount elimination

The result of this equity analysis concludes that minority and low-income riders will not be limited or denied the benefits of the proposed fare changes.

MyRide Stored Value Card Sales Considerations

The overall demand for MyRide Stored Value by RTD's ridership have been extremely low and suggests minimal impacts. In fact, the MyRide Stored Value accounts for 1.1% of total fare revenue in 2021 and 1.5% of total fare revenue in 2020. Furthermore, MyRide Stored Value \$0.20/\$0.10 discount sales have dropped 80% and 56% (respectively) from January 2020 to December 2021 as shown in Figure 1.



2022 RTD MyRide Customer Survey

Supplemental to the fare equity analysis, a targeted survey was launched on March 23, 2022 to collect feedback from customers of the considered changes to the MyRide program. The survey was utilized to inform the equity analysis and to evaluate how the potential changes would affect existing customers. The survey was sent via email and social media channels to 19,180 MyRide and LiVE customers and a total of 2,490 responses were received indicating a 13% response rate. See **Appendix B** for the 2022 RTD MyRide Customer Survey instrument.

Demographic Characteristics and Smartphone/Internet Access

- Approximately 46 percent of participants were men, 47% were female, and 1% Non-Binary;
- Approximately 25 percent of participants were non-Hispanic whites; and
- Approximately 20 percent of participants were low-income⁴;

Table 6 captures the response rates obtained from the survey questions that are relevant to the assessment. Specifically, the survey suggests there is a high level of satisfaction with the MyRide discount for 3-hour trips and the MyRide program. Additionally, over half of respondents are unlikely to use the alternatives (e.g., 10-Ride Ticket Books or Monthly Pass) to the Full-Fare or Discount Fare MyRide card. Participants were asked how frequent they ride RTD services and a majority (63%) are defined as infrequent⁵ customers. This suggests that MyRide customers are not frequent enough to warrant the purchase of 10-Ride Ticket Books or Monthly Pass. The most popular alternative was to purchase the 3-hour or DayPass mobile ticket at 61 percent. Nearly all participants reported having a smartphone (96%), a data plan with their cell phone provider (92%) and have access to wifi (95%). This suggests that the alternative to purchase mobile tickets is a viable option and accessible for existing MyRide customers.

In conclusion, the survey results indicate there is a high satisfaction with the MyRide program and the associated discounts for 3-hour trips. Although there is an unlikelihood with customers utilizing

⁴ RTD classified participants as low income if they indicated that their total household incomes were 150 percent or less of the national poverty threshold for their household size.

⁵ Infrequent includes: About once a week, A few times a month, Once a month, Less than a month, or I haven't ridden in the last 6 months.

alternatives, there are current options available or will be available as noted in the forthcoming Mitigation Measures section. Additionally, customers who use the current MyRide stored value card will have the option to switch to a new card on the new ABT fare collection system, which allows for fare capping. As noted in Table 1 above, fare capping increases period pass affordability by allowing customers to purchase period passes in smaller increments. As a result, customers will have peace of mind that they are paying the best fare available.

Table 6. Survey Details

Survey Question	Response Rate
What type of MyRide card do you use?"	85% (Full-fare and Discount MyRide Card)
How would you rate your satisfaction with the MyRide discount for 3-hour trips?	55% (Very Satisfied and Satisfied)
How would you rate your satisfaction with the MyRide program?	77% (Very Satisfied and Satisfied)
How does the MyRide discount influence your decision to use the MyRide card?	56% (A Moderate Amount to A Great Deal)
If the discount currently available for a three-hour trip using a Full-Fare or Discount Fare MyRide card were to go away, please rate how likely you would be to use the following alternatives.	<p>Alternatives Unlikely to Very Unlikely to Use</p> <ul style="list-style-type: none"> • 56% Use Exact Change • 33% Purchase mobile tickets (3-Hour or DayPass) • 59% Purchase mobile Monthly Pass • 47% Purchase mobile 10-Ride Ticket Packs • 53% Purchase paper tickets (3-Hour or DayPass) • 55% Purchase paper 10-Ride Ticket Books • 66% Purchase paper Monthly Passes

Mitigation Measures and Public Outreach

Mitigation Measures

The findings of this analysis do not prompt RTD to consider possible measures to avoid, minimize, and/or mitigate adverse impacts on minority or low-income riders. Albeit there were no adverse impacts presented, the following provides an overview of the already-planned or implemented measures for the MyRide transition:

- Introduce mobile 10-ride ticket packs on the Masabi mobile ticketing platform with the same pricing as the paper 10-ride ticket books or 10 trips with the current MyRide cards. This way riders who use MyRide primarily for the \$0.20/\$0.10 discount and do not ride enough to benefit from fare capping do not have to “go back to” paper if they want the same price. Note that this price advantage only applies to full fare and Discount (senior/disability) fare, there is no additional discount for using MyRide or 10-ride ticket books/packs for Youth and LiVE fares.
- Introduction of mobile stored value on the Masabi platform as a payment method. Initially, mobile stored value can be used as a payment method to buy mobile tickets. Once ABT is implemented, customers will be able to use it for tap-and-ride as well.

- Introduction of the “vendor portal” on the Masabi platform, which allows cash-paying customers (or customers with credit/debit cards who prefer to purchase in-person) to buy mobile tickets or mobile stored value at the RTD sales outlets.
- Transition: “True up” the fund balance on the current full fare and Discount fare (senior/disability) MyRide cards when creating the new Masabi stored value during transition, so customers can take the number of trips that they expected when they loaded/re-loaded their current MyRide card. For example, a full-fare MyRide card balance of \$2.80 will translate into a \$3 Masabi account balance (i.e., old balance equates to new balance). Note that this does not apply to Youth and LiVE MyRide cards since there is no additional “MyRide discount” for those.
- New retail network targeting convenience stores, drug stores, grocery stores for cash-paying customers (or anyone who prefers to purchase in-person) after the initial implementation of ABT.
- Paper LiVE 10-ride ticket books are now available for purchase by individuals, through all channels where paper 10-ride ticket books are available

Public Outreach

Although there were no disparate impacts or disproportionate burdens identified in the Title VI equity analysis, RTD has established a transition and conversion strategy which will inform current MyRide customers of the program’s discontinuation, how they can transfer any existing MyRide balances for future use on RTD, and the alternative fare products, discounts and tools that are available to them moving forward. A mix of targeted outreach, in-system and on-vehicle assets, digital and social media, community outreach and Public Relations will inform and educate not only MyRide customers, but all RTD customers, employees, stakeholders, and the public, of the features and capabilities of the ABT system and how their journey on RTD will be adapted and improved as a result of its implementation.

Appendix A: Average Fare Analysis

Appendix A-1: Average Fare Analysis – Minority

	Average Fare per Boarding		Change in Average Fare	% Change in Average Fare	Overall Riders			Minority Riders			Non-Minority Riders		
	Existing	Proposed			Customer Boardings	Fare Revenue		Customer Boardings	Fare Revenue		Customer Boardings	Fare Revenue	
						Existing	Proposed		Existing	Proposed		Existing	Proposed
Non MyRide Stored Value	\$1.42	\$1.42	\$0.00	0.0%	102,630,761	\$146,204,960	\$146,204,960	34,766,810	\$49,527,841	\$49,527,841	67,863,951	\$96,677,119	\$96,677,119
MyRide Full Fare, Local	\$2.24	\$2.40	\$0.16	7.1%	880,083	\$1,969,114	\$2,109,765	187,018	\$418,437	\$448,325	693,065	\$1,550,677	\$1,661,440
MyRide Discount Fare, Local	\$0.96	\$1.02	\$0.07	7.1%	216,883	\$207,484	\$222,305	46,088	\$44,090	\$47,240	170,795	\$163,394	\$175,065
MyRide Full Fare, Regional	\$4.68	\$4.87	\$0.19	4.0%	234,867	\$1,099,771	\$1,143,326	48,260	\$225,980	\$234,930	186,607	\$873,790	\$908,396
MyRide Discount Fare, Regional	\$2.17	\$2.26	\$0.09	4.0%	29,862	\$64,929	\$67,526	6,136	\$13,341	\$13,875	23,726	\$51,587	\$53,651
MyRide Full Fare, Airport	\$9.94	\$10.13	\$0.19	1.9%	27,125	\$269,638	\$274,873	5,574	\$55,405	\$56,481	21,551	\$214,233	\$218,392
MyRide Discount Fare, Airport	\$4.95	\$5.04	\$0.10	1.9%	8,919	\$44,105	\$44,962	1,833	\$9,063	\$9,239	7,086	\$35,042	\$35,723

Sum	104,028,500	\$149,860,000	\$150,067,716	35,061,718	\$50,294,158	\$50,337,931	68,966,782	\$99,565,842	\$99,729,785
Average Fare		\$1.441	\$1.443		\$1.434	\$1.436		\$1.444	\$1.446
Percentage Change in Average Fare			0.14%			0.09%			0.16%
Difference in Average Fare for Protected Populations						-0.08%			
Difference in Average Fare - Protected vs. All Populations						-0.05%			

Appendix A-2: Average Fare Analysis – Low Income

	Average Fare per Boarding		Change in Average Fare	% Change in Average Fare	Overall Riders			Low-Income Riders			Non Low-Income Riders		
	Existing	Proposed			Customer Boardings	Fare Revenue		Customer Boardings	Fare Revenue		Customer Boardings	Fare Revenue	
						Existing	Proposed		Existing	Proposed		Existing	Proposed
Non MyRide Stored Value	\$ 1.42	\$ 1.42	\$ -	0.0%	102,630,761	\$ 146,204,960	\$ 146,204,960	27,342,912	\$ 38,951,961	\$ 38,951,961	75,287,849	\$ 107,252,999	\$ 107,252,999
MyRide Full Fare, Local	\$ 2.24	\$ 2.40	\$ 0.16	7.1%	880,083	\$ 1,969,114	\$ 2,109,765	123,955	\$ 277,340	\$ 297,150	756,128	\$ 1,691,774	\$ 1,812,615
MyRide Discount Fare, Local	\$ 0.96	\$ 1.02	\$ 0.07	7.1%	216,883	\$ 207,484	\$ 222,305	30,547	\$ 29,223	\$ 31,310	186,336	\$ 178,261	\$ 190,994
MyRide Full Fare, Regional	\$ 4.68	\$ 4.87	\$ 0.19	4.0%	234,867	\$ 1,099,771	\$ 1,143,326	20,423	\$ 95,632	\$ 99,420	214,444	\$ 1,004,138	\$ 1,043,906
MyRide Discount Fare, Regional	\$ 2.17	\$ 2.26	\$ 0.09	4.0%	29,862	\$ 64,929	\$ 67,526	2,597	\$ 5,646	\$ 5,872	27,265	\$ 59,283	\$ 61,654
MyRide Full Fare, Airport	\$ 9.94	\$ 10.13	\$ 0.19	1.9%	27,125	\$ 269,638	\$ 274,873	2,359	\$ 23,447	\$ 23,902	24,766	\$ 246,191	\$ 250,971
MyRide Discount Fare, Airport	\$ 4.95	\$ 5.04	\$ 0.10	1.9%	8,919	\$ 44,105	\$ 44,962	776	\$ 3,835	\$ 3,910	8,143	\$ 40,270	\$ 41,052

Sum	104,028,500	\$149,860,000	\$150,067,716	27,523,569	\$39,387,084	\$39,413,525	76,504,931	\$110,472,916	\$110,654,191
Average Fare		\$1.441	\$1.443		\$1.431	\$1.432		\$1.444	\$1.446
Percentage Change in Average Fare			0.14%			0.07%			0.16%
Difference in Average Fare for Protected Populations						-0.10%			
Difference in Average Fare - Protected vs. All Populations						-0.07%			

Appendix B: 2022 RTD MyRide Customer Survey Instrument

RTD is considering changes to the MyRide program and is conducting an Equity Assessment to understand how current MyRide customers may be affected. Completing this survey will help RTD identify how current customers use MyRide and how any potential changes may impact them. This survey will take about five minutes to complete. All responses are completely confidential. Data will be reported in group form only.

This survey is intended for current MyRide customers. If you do not have a MyRide card, you do not need to take this survey.

1. Are you a current MyRide card holder?

☐ Yes

☐ No

2. What type of MyRide card do you use?

- ☐ Full-fare MyRide card
- ☐ Discount MyRide card (seniors and individuals with disabilities)
- ☐ Youth MyRide card
- ☐ LiVE MyRide card

Full-fare MyRide card holders receive a \$0.20 discount on 3-hour trips. Discount MyRide card holders for seniors and individuals with disabilities receive a \$0.10 discount on 3-hour trips.

3. How would you rate your satisfaction with the MyRide discount for 3-hour trips?

- ☐ Very satisfied
- ☐ Satisfied
- ☐ Neither satisfied nor dissatisfied
- ☐ Dissatisfied
- ☐ Very dissatisfied
- ☐ Not applicable - I have a LiVE MyRide or Youth MyRide card

Full-fare MyRide card holders receive a \$0.20 discount on 3-hour trips. Discount MyRide card holders for seniors and individuals with disabilities receive a \$0.10 discount on 3-hour trips.

4. How does the MyRide discount influence your decision to use the MyRide card?

- ☐ A great deal
- ☐ A lot
- ☐ A moderate amount
- ☐ A little
- ☐ None at all
- ☐ Not applicable - I have a LiVE MyRide or Youth MyRide card

5. If the discount currently available for a three-hour trip using a Full-Fare or Discount Fare MyRide card were to go away, please rate how likely you would be to use the following alternatives. If you use the LiVE MyRide card or Youth MyRide card, please select "Not applicable" for each option.

Paper 10-Ride Ticket Books and Mobile 10-Ride Ticket Packs offers \$0.20 discount per ticket off Full-Fare and a \$0.10 discount off Discount Fare.

	Very likely	Likely	Neither likely nor unlikely	Unlikely	Very unlikely	Not applicable
Use exact change (for bus service)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Purchase mobile tickets (3-Hour or Day Pass)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Purchase mobile Monthly Pass	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Purchase mobile 10-Ride Ticket Packs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Purchase paper tickets (3-Hour or Day Pass)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Purchase paper 10-Ride Ticket Books	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Purchase paper Monthly Passes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I would not use RTD services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

6. How frequently do you use the MyRide card to take a trip with RTD?

- ☐ Every day
- ☐ A few times a week
- ☐ About once a week
- ☐ A few times a month
- ☐ Once a month
- ☐ Less than once a month
- ☐ I haven't used the MyRide card in the last six months

7. How do you most often reload funds onto your MyRide card?

- ☐ Through the online MyRide portal
- ☐ At RTD sales outlets (Union Station bus concourse, Civic Center Station, Downtown Boulder Station, and Airport Station)
- ☐ At local retailers (select Safeway and King Soopers stores)

8. How would you rate your satisfaction with the MyRide program?

- ☐ Very satisfied
- ☐ Satisfied
- ☐ Neither satisfied nor dissatisfied
- ☐ Dissatisfied
- ☐ Very dissatisfied

9. How easy is it to use the MyRide card?

- ☐ Very easy
- ☐ Easy
- ☐ Neither easy nor difficult
- ☐ Difficult
- ☐ Very difficult

10. How easy it is to reload funds onto your MyRide card?

- ☐ Very easy
- ☐ Easy
- ☐ Neither easy nor difficult
- ☐ Difficult
- ☐ Very difficult

11. How frequently do you ride RTD services?

- ☐ Every day
- ☐ A few times a week
- ☐ About once a week
- ☐ A few times a month
- ☐ Once a month
- ☐ Less than once a month
- ☐ I haven't ridden RTD in the past six months

12. When riding RTD, which fare level do you use most often?

- ☐ Local
- ☐ Regional
- ☐ Airport
- ☐ Not sure

13. In addition to the MyRide card, have you used any of the following fare products in the past 12 months?

Please check all that apply.

☐ 3-Hour Pass (bus fare box, ticket vending machines, mobile apps)

☐ Monthly Pass (paper, mobile apps)

☐ Day Pass (bus fare box, ticket vending machines at stations and platforms, mobile apps)

☐ None

☐ 10-Ride Ticket Book (paper, mobile apps)

☐ Other (please specify)

14. Do you have access to a credit or debit card?

- ☐ Yes
- ☐ No

RTD mobile tickets can be purchased on mobile devices with access to the internet (through both wireless connections and cell phone provider data plans) on the RTD Mobile Ticketing app.

15. Do you have a smartphone?

- ☐ Yes
- ☐ No

16. Do you have a data plan with your cell phone provider?

- ☐ Yes
- ☐ No

When using the RTD mobile app to purchase tickets, access to the internet is not necessary for activating tickets that have been purchased and stored in the app's digital wallet.

17. Do you have access to wifi?

- ☐ Yes
- ☐ No

18. How many people are in your household?

19. What is your total annual household income?

- ☐ Under \$10,000
- ☐ Between \$10,000 and \$19,999
- ☐ Between \$20,000 and \$39,999
- ☐ Between \$40,000 and \$49,999
- ☐ Between \$50,000 and \$59,999
- ☐ Between \$60,000 and \$69,999
- ☐ Over \$70,000
- ☐ Don't know

20. What gender do you identify with?

- ☐ Female
- ☐ Male
- ☐ Non-binary
- ☐ Prefer not to say
- ☐ I self-identify as:

21. How would you describe yourself?

- ☐ Asian/Pacific Islander
- ☐ Caucasian/White (non-Hispanic/Latino)
- ☐ Multi-racial/bi-racial
- ☐ African American/Black
- ☐ Hispanic/Latino
- ☐ Alaska Native/American Indian
- ☐ Not listed (please specify)

Thank you for sharing your feedback on the MyRide program. RTD strives to provide value to the communities we serve and consistently deliver high-quality customer service. Your participation in this survey is valuable and learnings will be used to determine how any changes to the MyRide program may affect current customers.

BOARD OF DIRECTORS REPORT

MyRide Stored Value Discount Title VI Fare Equity Analysis

Committee Meeting Date:
May 10, 2022
Board Meeting Date:
May 24, 2022

RECOMMENDED ACTION

For the Board of Directors to adopt the Title VI Fare Equity Analysis report for the MyRide Smart Card Stored Value Discount elimination. This ensures compliance with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964.

STAFF REPRESENTATIVE

Carl Green Jr., Transit Equity Manager

PRESENTATION LENGTH

15 minutes

BACKGROUND

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, RTD conducts an equity analysis any time fare changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations.

Pursuant to FTA Circular 4702.1B Chapter IV.7, RTD must establish a Disparate Impact Policy and a Disproportionate Burden Policy. Collectively, these policies provide foundational requirements for evaluating fare change proposals for equity and compliance with Title VI. These policies and their applicable thresholds are defined and illustrated as follows:

Disparate Impact Analysis

A disparate impact analysis is a review of the difference in the adverse effects absorbed by minority persons as a result of any fare price change or the average of multiple fare changes shall not be greater than or less than 5% of impacts absorbed by the overall ridership. "Minority" is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

Disproportionate Burden Analysis

A disproportionate burden analysis is defined as an examination of the difference in the adverse effects absorbed by low-income persons as a result of any fare price change or the average of multiple fare changes shall not be greater than or less than 5% of impacts absorbed by the overall ridership. A low-income population is a group of households who are at or below 150 percent of the Department of Health and Human Services Poverty Guidelines.

If a proposed fare change results in a disparate impact or a disproportionate burden, RTD will consider modifying the proposal to avoid, minimize, or mitigate potential adverse effects. The agency will then analyze the modification and make sure it removed the potential disparate impact or disproportionate burden. If a less discriminatory option cannot be identified and RTD can demonstrate a substantial legitimate justification for the proposed fare change, the FTA may allow RTD to proceed with the proposed change.

Methodology

For proposed changes that would increase or decrease the fares on the entire system, on certain transit modes, or by fare payment type or fare media, RTD must analyze any available information generated from customer surveys. Customer survey analysis indicates whether minority and/or low-income customers are disproportionately more likely to use the mode of service, payment type, or payment media subject to the fare change.

A fare equity analysis compares the existing fare to proposed changes and calculates the absolute change as well as the percent change. Using the Disparate Impact and Disproportionate Burden Threshold, a determination will be made as to whether the fare change will result in adverse effects that are disproportionately borne by the minority or low-income populations, respectively. The thresholds are also used to assess whether the proposed changes disproportionately benefit non-minority or non-low-income populations.

An average fare analysis is undertaken to assess the effects of the proposed fare changes on the average fare paid per boarding. The average fare analysis determines whether the changes disproportionately adversely impact minority or low-income customers or whether non-minority or non-low-income customers disproportionately benefit from the changes.

MyRide Stored Value Card System

RTD introduced its current MyRide stored-value smart card system (SV system) in 2013. Customers using a MyRide card receive a \$0.20 discount when purchasing a full-fare three-hour pass. Customers using a Discount MyRide card issued to seniors, individuals with disabilities, and Medicare card holders receive a \$0.10 discount when purchasing fare for a half-fare three-hour pass.

At this time, the SV system is nearing the end of its serviceable life, and the agency will replace it with account-based ticketing (ABT) system while retaining customers' option to use newly issued smart cards compatible with the existing smartphone app.

Existing MyRide cards and current MyRide stored value are not compatible with the new ABT system. Due to this system incompatibility, customers will be required to take action to transfer any stored value currently held via MyRide cards either:

- To an ABT system account accessible via smartphone app or
- To an ABT-compatible smart card if they do not intend to use a smartphone app to show proof of valid fare

DISCUSSION

In adopting this recommended action, the agency seeks to meet the Strategic Plan priority of Customer Excellence in establishing a streamlined process for the new ABT system with a central focus on the customer experience.

As a result of the implementation of the ABT system along with the practice of fare capping, the discontinuation of the SV system, and the need for customers to take action to move from the older generation system to the newer one, staff recommends the elimination of the existing MyRide SV discounts of \$0.20 and \$0.10 given to customers purchasing full-fare and discounted three-hour passes, respectively.

To make this process as smooth and timely as possible for customers, RTD is proposing to discontinue the sale and reload of MyRide cards and MyRide stored value in June 2022, ahead of the installation of the new validators that starts at the end of July 2022, which will render the current MyRide cards incompatible.

Summary of Findings:

- **Disparate Impact Analysis** – the analysis found that minority customers are expected to experience a slightly smaller average fare increase than non-minority customers and an even smaller increase compared to all customers. This suggests the potential impacts of the fare change are more likely to be borne by non-minority and all customers as a whole. Therefore, the proposal to eliminate the full-fare and discount MyRide SV discount does not present a Disparate Impact.
- **Disproportionate Burden Analysis** – the analysis found that low-income customers are expected to experience a slightly smaller average fare increase than higher income customers and even a smaller increase compared to all customers. This suggests the potential impacts of the fare change are more likely to be borne by higher income and all customers as whole. Therefore, the proposal to eliminate the full-fare and discount MyRide SV discount does not present a Disproportionate Burden.

Conclusions:

All MyRide full-fare and discount customer populations are expected to see an increase in the average fare. However, the proposed fare changes are expected to have a lesser impact on minority and low-income customers, and a greater impact on non-minority and higher income customers. In no cases do the changes in average fare reach or exceed RTD's Disparate Impact or Disproportionate Burden thresholds.

FINANCIAL IMPACT

The adoption of the MyRide Stored Value Discount Title VI Fare Equity Analysis will not result in any direct or foreseeable agency financial impacts.

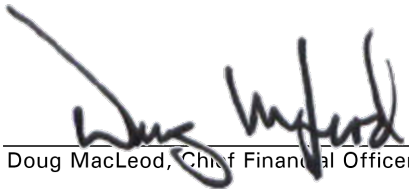
ATTACHMENTS:

- RTD Title VI Fare Equity Analysis Report - MyRide SV Discounts - 04_29_2022 (PDF)
- Fare Equity Analysis Report Appendix B RTD MyRide 2022 Customer Survey Final (PDF)
- 2022-04-29 - MyRide SV Fare Equity Analysis Presentation to Board of Directors (PPTX)

RESULT:	ADOPTED BY CONSENT VOTE [UNANIMOUS]
MOVER:	Troy Whitmore, Director, District K
SECONDER:	Angie Rivera-Malpiede, Director, District C
AYES:	Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Lewis, Rivera-Malpiede, Sloan, Tisdale, Whitmore, Williams

Prepared by:
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Doug MacLeod, Chief Financial Officer

5/2/2022

Authorized by:

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Debra A. Johnson, General Manager and CEO

5/5/2022

Attachment K

July 2021 Service Change Plan Equity Analysis, with Documentation of Board Approval

Title VI Service Equity Analysis

September 2021 Service Changes

July 2021

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Executive Summary

This document summarizes the analysis of the service changes between the June 2021 and September 2021 runboards to ensure changes have not inequitably impacted minority and low-income populations.

Methodology

RTD's established Title VI program methodology defines the process to identify major service changes, disparate impacts, and disproportionate burdens. Analyses were performed at the route and block group levels to identify any potential disparities in service changes based on race/ethnicity or income.

Major Service Changes

RTD is proposing changes to 28 bus route/patterns and 3 rail lines of RTD's forthcoming September 2021 runboard. Of these 31 changes, 18 services meet established thresholds for a major service change. The routes listed below have proposed modifications or reinstatements to service that were greater than 25% of baseline service. Routes in bold met a threshold for major service changes.

Modified Services (25 services) <i>(Additional trips, expanded spans of service)</i>	10, 19, 20, 42, 43, 45, 46, 48, 65, 105, 120, 121, 130, 153, 204, 206S, 225, DASH, JUMP, SKIP, BOLT, LD3 E Line, N Line, W Line
Reinstated Services (6 services)	0L, 3L, 116X, CV, EV, P

Findings

None of the proposed changes involve reductions in service; all service changes in this runboard were additions of service through modifications or reinstatements of suspended service. Service was modified with additional trips, decreased headways, or longer spans of service, and some routes were finally reinstated since their elimination during extreme service reductions in the face of last year's challenging pandemic.

Major service change increases were entirely invested on bus services, and within bus service classes, these additional hours were distributed among Central Business District (CBD) Local (22.4%), Urban Local (34%), Suburban Local (26.5%), and Regional (16.7%) bus routes.

When considering the demographics within the service areas of routes with major service changes and as a proportion to the District overall, **both minority and low-income equity populations received a greater increase in service (were positively impacted more) compared to non-equity populations.** Minority areas had a nearly +2% benefit above non-minority areas and low-income areas received over +6% compared to higher income areas.

However, **potential disparate impacts and disproportionate burdens were identified:** of the 18 routes that had major service changes, 14 had potential disparate impact findings and 2 routes had both disparate impact and disproportionate burden findings.

Introduction

Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD) mission to provide mass transit service in the Denver Metro Area. An equitable mass transit system fairly distributes the benefits and adverse effects of transit service without regard for race, color, national origin, or low-income status. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 pertaining to environmental justice.

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

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Environmental Justice. In this circular, the FTA requires RTD to evaluate, prior to implementation, any and all service changes that exceed the established major service change threshold, to determine whether those changes will have a disproportionately negative impact on minority or low-income populations.

This equity analysis report has been prepared to document changes that are proposed to occur between the June 2021 and September 2021 runboards. Routes with major service changes include 19 major increases with 6 of those major service changes being reinstatements of formerly suspended routes. These changes and all others have been reviewed individually at the route level and in aggregate at the block group level to identify potential impacts to the communities RTD serves.

Service Change Philosophy

An equity analysis is triggered by proposed major service changes to the transit services provided by RTD. These changes include the addition of new routes, the elimination of existing routes, and changes to the alignment and trip frequency within existing routes. RTD has established principles to identify the service changes needed to meet the diverse travel needs of the residents of the District and maintain a high-performance, sustainable transit system.

RTD Service Changes Guiding Principles

- Service performance evaluation based on the RTD Service Standards;
- The effects on the overall integrity of the transit network and on transit dependent markets;
- The availability of alternative services to affected riders;
- Cost-effective distribution throughout the District and Family of Services and the ability to enhance service when possible;
- Title VI of the Civil Rights Act: benefits and services are provided without regard to race, color or national origin; also disparate effects on low-income and minority populations; and
- Response to changes in the communities where services are provided.

RTD services are divided into various service classes depending on service type, route alignment, and frequency. Each service class has its own service standards derived from the performance of all routes within each class. RTD continually and comprehensively adjusts services in response to changes in ridership and operational performance of the transit system. It is also the District's responsibility to identify services that are underperforming and recommend modifications, curtailment, or cancellation of service as warranted. In keeping with Colorado Revised Statutes, RTD utilizes official service standards to establish performance metrics used to identify underperforming services on a class-of-service basis. The District uses these metrics to identify a series of service changes. Equity analyses examine the impact of the proposed major service changes on minority populations and low-income households at or below 150 percent of the Department of Health and Human Services Poverty Guidelines.

...The general assembly further finds that the district should be organized efficiently, economically, and on a demand-responsive basis and that the district should consider least-cost alternatives in discharging its responsibilities. The general assembly further finds that the farebox recovery ratio of the district must be improved so that resources once allocated for mass transportation can be made available for other surface transportation needs.

--Colorado Revised Statutes 32-9-119.7 Farebox Recovery Ratios -- Plans

RTD's Title VI Equity Analysis Policies

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a Major Service Change Policy, a Disparate Impact Policy, and a Disproportionate Burden Policy. Collectively, these policies provide foundational requirements for evaluating service change proposals for equity and compliance with Title VI. These policies and their applicable thresholds are listed below:

1. **Major Service Change:** A major service change is defined as a 25 percent addition or reduction in the service hours of any route that would remain in effect for twelve (12) or more months. All major service changes will be subject to an equity analysis that includes an analysis of adverse effects.
 - a. An **Adverse Effect** is defined as a geographical or temporal reduction in service that includes, but is not limited to, eliminating a route, shortening a route by eliminating segments, rerouting an existing route, and increasing headways. RTD shall consider the degree of adverse effects and analyze those effects when planning major service changes.
2. **Disparate Impact Analysis:** A major service change should not adversely affect a minority population 10 percent more than non-minority populations; this level of impact is considered a disparate impact.
3. **Disproportionate Burden Analysis:** A major service change should not adversely affect a low-income population 10 percent more than higher income populations; this level of impact is considered a disproportionate burden. A low-income population is a group of households who are at or below 150 percent of the Department of Health and Human Services Poverty Guidelines.

If a proposed major service change results in a disparate impact or a disproportionate burden, RTD will consider modifying the proposed service change. RTD will then analyze the modification and make sure it removed the potential disparate impact or disproportionate burden. If a less discriminatory option cannot be identified and RTD can demonstrate a substantial legitimate justification for the proposed service change, the FTA may allow RTD to proceed with the proposed change.

Analysis

Data Sources & Methodology

Demographic data used for this analysis comes from the Census Bureau's American Community Survey (ACS) 5-Year Estimates for years 2014 to 2018 and is reviewed at the census block group geographic level. Other data related to the analysis includes route alignments and block group geography. The linking of these datasets into a service-geographic-demographic combination relates equity populations with changes in service at a geographic level to aid in reviewing potential impacts to District equity communities.

The equity analysis for the September 2021 runboard looked at whether an individual route's major service changes impacted the communities it served. The review needed to determine the proportional difference in changes made to equity populations within a route's quarter-mile service area. These proportional differences were compared against District population proportions of equity populations and route proportions of equity populations.

Low-income status for population within the District is derived from the Census Bureau and is based on 150% of the United States federal poverty level (Department of Health and Human Services guidelines), based on local context, which is an annual income of \$32,580 for a family of 3. Minority status was based on the non-white and Hispanic or Latino count of total population. The service area was based on the collection of block groups within the District boundaries.

Route service area population was determined using a quarter mile “catchment area” centered around bus stops and rail stations. This catchment area was then used to calculate the percentage overlap of census block-based population underneath. For instance, if a catchment area contained 100% of the underlying block group, 100% of the population would be associated with the services within a quarter mile; if 50% of a block group was contained in the catchment area, only half of the underlying population would count as being included (ratios of population demographics would be unchanged).

RTD calculated the net change in service hours for each route modification to provide the percent difference from baseline service hours. Any change at or above 25% from baseline was flagged as a major service change for further review.

Public Outreach Overview

September 2021 Service Changes

Three public meetings were conducted between June 28th and July 7th, 2021. The service change comments, and the details of these meetings are summarized in the AGENDA PACKET. Table 1 captures the meeting locations and dates, the number of attendees and the common themes obtained from the comments.

Table 1. Public meeting details

Date & Time Location	Comment Themes	Number of Attendees
June 28th at 5:30pm Virtual Public Meeting	Adding back and reinstating service	30
July 1st at 5:30pm Virtual Public Meeting	Support for the reinstatement of 116X, Reinstatement of the GS Line, bringing back the J bus route for CU Students and Staff, Consideration to bring back the FF4, Reinstatement of Routes 46 and 35, Late night and OWL service for next service proposals (e.g., 0 and 15 routes)	45
July 7th at noon Virtual Public Meeting	Adding back and reinstating service	63
		Total – 138

The public was also notified of the ability to submit comments to service.changes@rtd-denver.com, by phone at 303-299-2004, and by fax 303-299-2227. The main comments were related to adding back service.

Major Service Change, Disparate Impact, and Disproportionate Burden Analysis

Proposed service changes for the September 2021 runboard that resulted in a 25% or greater change in service were categorized by equity grouping (minority or non-minority, low-income or higher income) for comparison. Routes were categorized as either equity or non-equity based on their identification within the prior network using 2018 ACS 5-year demographic data.

A comparative, proportional equity analysis was completed to review the routes individually. This analysis identified the equity and non-equity populations within a route service area and compared those against the equity and non-equity populations of the District. If impacted equity populations within the route service area received 10% or greater impacts compared to non-equity populations, the route had a potential finding of disparate impact (for minority populations) or disproportionate burden (for low-income populations) and was flagged for a finding of potential impact.

MAJOR SERVICE CHANGE TEST

Identify routes with proposed major service changes (annual trips) of 25% or more

Changes by Transit Mode

Additional hours of service were primarily driven into rebuilding bus services that had previously been curtailed or suspended. **Bus service was increased by nearly 454 daily revenue service hours.** The E, W, and N rail lines had modest increases in service (additional trips on E Line, additional trip on W Line, and schedule modifications N Lines). **Additional daily revenue service hours are proposed for modified or reinstated services, with 380 of those hours at or above major service change thresholds.**

Table 2. Summary of service changes by transit mode

Mode	Additional Daily Hours
All Rail	1.8
All Bus	453.8
Overall	455.6

Changes by Route Service Class

All service changes were reviewed by service class, categories generally describing the geographic location or service area (and unique performance thresholds) of each route. Service changes included all changes to daily hours in addition to only hours associated with major service changes. Service classes include 4 categories for bus services: Central Business District (CBD) Local, Urban Local, Suburban Local, and Regional, a rail category, and 3 special services (MallRide, MetroRide, and the Englewood Trolley). **Generally, additional hours of revenue service were evenly distributed among CBD, Urban, and Suburban Locals and Regional services, with slightly more allocated to Urban and Suburban Local services.**

Table 3. Major Service Changes by Route Service Class

Service Class	Line Count	Change in Daily Hours	Pct of Total	Major Svc Change Hours	Pct of Total
CBD Local	7	102.0	22.4%	87	22.9%
Urban Local	8	155.0	34.0%	108	28.4%
Suburban Local	8	120.8	26.5%	109	28.7%
Regional	6	76.0	16.7%	76	20.0%
Rail	3	1.8	0.4%	0	0%
MallRide	0	n/a	n/a	n/a	n/a
MetroRide	0	n/a	n/a	n/a	n/a
Trolley	0	n/a	n/a	n/a	n/a
Total	32	455.6	100%	380.0	100%

Major Service Change Review

A complete listing of all service changes can be found in Appendix A. Changes were first reviewed in aggregate equity groupings of routes prior to individual review of routes, route block groups, and overall network levels; equity grouping comparison occurred at every level. Major service changes are categorized as the following:

- **Major Service Reductions or Eliminations** (a service reduction of 25% or more)
- **Major Service Increases/Restructuring** (service increases of 25% or more related to new or restructured service)

Major Service Changes

Eighteen bus routes had major service changes and included 12 bus routes with service increases of 25% or greater and 6 reintroduced bus routes.

Major Service Change Reductions/Eliminations

There were no major service reductions.

Major Service Change Increases/Restructuring

Eighteen routes were found to have major service change increases. These included 6 reinstatements (0L, 3L, 116X, CV, EV, and P) and 12 modifications to spans of service or additional trips (10, 19, 42, 48, 120W, 204, 206S, 225, JUMP, SKIP, BOLT, and LD3). Other routes had modifications that did not meet the threshold for major service changes (20, 43, 45, 46, 65, 105, 121, 130, 153, DASH, E Line, W Line, and N Line)

Route-Level Analysis

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each route individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and service increases are analyzed (for this analysis there were no reductions). For service increases, the

analysis examines the extent to which the benefits of the improvements are inclusive of minority and low-income populations. For service decreases, the analysis examines the extent to which the adverse effects of the reductions are disproportionately borne by minority and low-income populations.

DISPARATE IMPACT AND DISPROPORTIONATE BURDEN ANALYSIS

For each route with a major service change, determine the percent of the route's impacted equity and non-equity populations comprising the District's equity and non-equity populations; if the difference is greater than 10% for equity populations, additional review is required for potential adverse impacts

In concert with RTD's Title VI policies, the demographics of each of major service change routes were reviewed for potential disparate impact (DI) or disproportionate burden (DB) findings. In summary, the review of these adverse impacts determined the following:

- **14 routes met the threshold for a potential disparate impact**
- **2 routes met the threshold for a potential disproportionate burden**
- **2 routes met thresholds for both impacts**

A complete listing of all potential DI and DB findings can be found in Appendix B.

Network Analysis

A network analysis is not typical in RTD's equity analyses but was used to understand the large number of service changes occurring across the network. A network level analysis has potential to provide further understanding of changes to service levels for Title VI protected populations at aggregate levels.

While RTD has not established a formal policy for a network level analysis, the major service change threshold of 25% or greater used for individual route-level analyses was used as precedent to determine potential adverse impacts overall and to identify structural issues in areas requiring further review. Once average District thresholds for low-income and minority populations were established, subsequent equity analyses focused on the subset of District block groups that experienced major service changes of 25% or greater (additions or reductions in service), and whether equity block groups with major service changes experienced service changes of 10% or more compared to non-equity block groups. Routes with major service changes are later comparatively reviewed for potential adverse effects at route-block group levels (block groups within route service areas).

The analysis of all service changes identified the following:

- Systemwide, service was increased by over 450 daily revenue hours.
- Of the over 350,000 people available to be served by stops within the service area of routes with major service changes, minority and low-income groups represented a higher share of population than District averages, indicating targeted services to equity groups.

- At the route level, equity routes and non-equity routes¹ were compared only for those with major service changes. Of the 18 routes with major service changes, all but 1 route (P) serve above-average minority or low-income populations.

In aggregate, a review of all routes found no adverse impacts between equity and non-equity routes.

An analysis of all District block groups and their service levels was conducted to establish the baseline equity thresholds for low-income and minority populations and to determine the systemwide magnitude of impacts of the June 2021 to September 2021 service change. Block groups with low-income and minority populations at or above the District average are referred to in this analysis as “equity” block groups whereas higher income and non-minority block groups are referred to as “non-equity” block groups.

NETWORK ANALYSIS PROCESS

Determine block groups at/above District averages for low-income population (16.8%) and minority population (35.4%)

Determine which block groups experienced service changes of 25% or more

Of block groups with a major service change, compare the difference in annual trips for equity versus non-equity block groups; if the difference is more than 10%, review for potential adverse impacts

There are 1,916 block groups defined as being wholly within or mostly within the District². Using the 2018 5-Year ACS Estimates, total population residing within these block groups was calculated as well as the total minority population and total low-income population, calculated separately, to determine the District-wide low-income and minority rates which set the thresholds for which block groups are classified as above average. While the percent minority figure of 35.4% was derived by using the base population of the service area (3.019 million) the low-income population percentage of 16.8% is derived from a slightly smaller population figure. This is due to the smaller population whose poverty status the Census Bureau can determine³. The thresholds summarized in Table 4 yielded 751 (39% of all) block groups above the District average for low-income population, and 715 (37%) block groups above the District average for minority population.

Table 4. District averages; NTD 2018; ACS 2014-2018 5-Year estimates

Service Area (sq. mi.)	Total Block Groups	Total Population	Percent Minority	Total Population (assessed)	Percent Low-Income
2,342	1,916	3,019,217	35.4%	2,974,027	16.8%

¹ Based on existence of the route within the June 2021 network and the population within a quarter mile of bus stops or rail stations. 2018 5-Year estimates were used for population identification.

² Some block groups are not completely contained within the District boundaries due to differences in boundaries between the District and Census-defined geographies.

³ The total population whose poverty status is determinable/assessed is lower than the estimate of total population and results in a different base population used to determine low-income percent of population.

Proposed major service changes were examined in aggregate to determine overall impacts to underlying population. Table 5 summarizes the change in service for block group population within one quarter mile of stops with proposed major service changes proportionally compared to population in the District. This comparison reviews the equity composition of those who may be impacted by proposed service changes compared to the overall equity composition of the District overall.

Equity groups stand to benefit more than non-equity groups, with minority population benefitting almost 2% more than non-minority population and low-income population receiving 6% more than higher income population.

Table 5. Systemwide disparate impact and disproportionate burden equity analysis summary

Systemwide Disparate Impact & Disproportionate Impact Analysis				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	219,856	127,206	268,279	78,783
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	88.7%	88.1%	89.2%	84.2%
% District Impacted	11.28%	11.90%	10.84%	15.81%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	10.15%	11.90%	9.75%	15.81%

Figures 2 and 3 illustrate the locations of above average low-income and minority block groups within the District, as well as highlight routes with major service changes (orange). Low-income populations and minority populations appear to overlap in similar areas outside of central Denver, including most of Aurora, Commerce City, and Brighton, and areas east of Boulder, and areas southeast of Longmont. Low-income populations appear to have greater spread, with additional areas in the mountain communities and areas west of Downtown Denver.

Proposed major service changes indicated in these figures show the reinstatement of regional express services in outer areas previously impacted by pandemic service cuts, such as CV, EV, and P. Reinstatement of these services expands regional access across the District service area. Several routes also cover large expanses of equity areas, such as Routes 3L, 19, and 42.

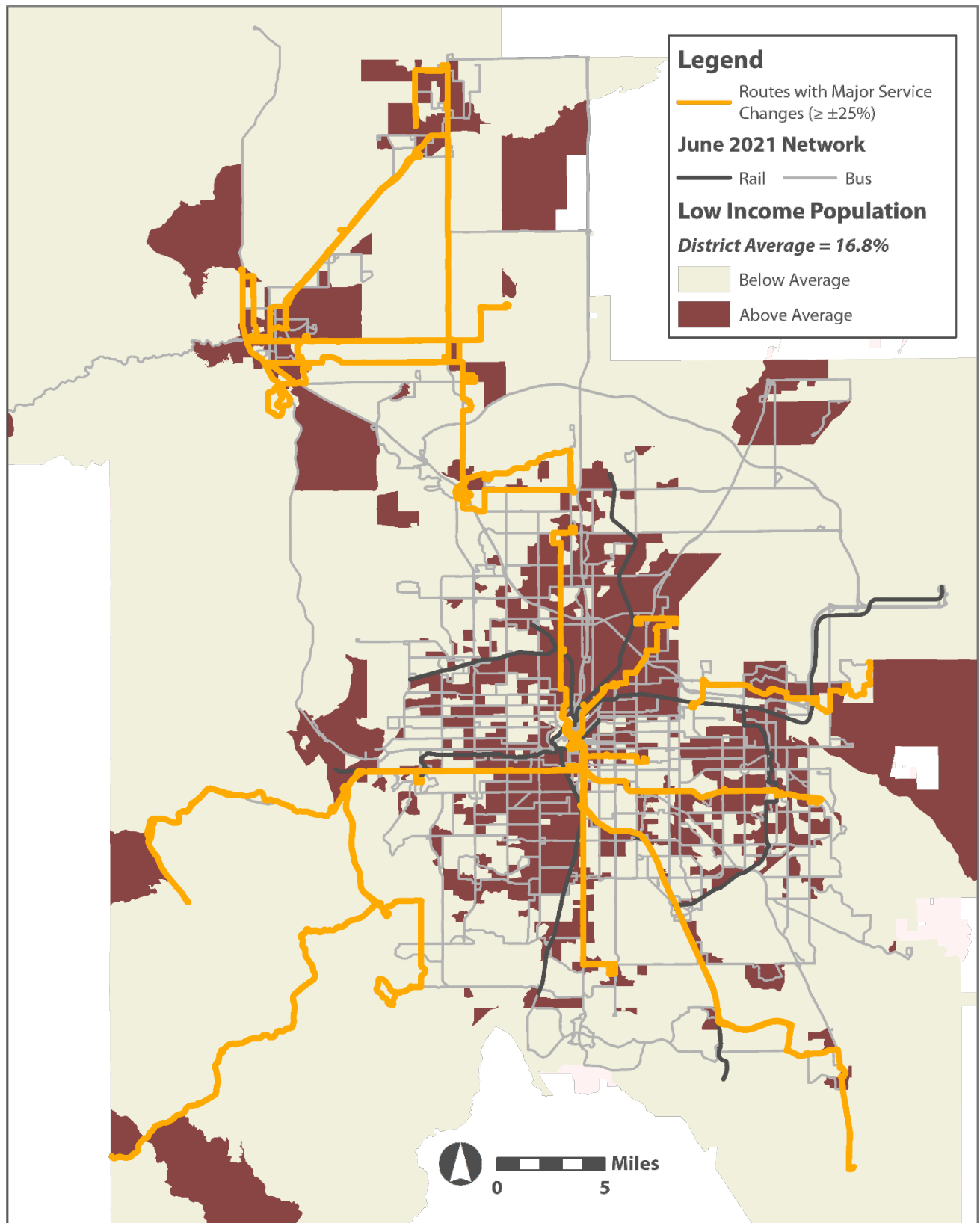


Figure 1. District block groups with above-average low-income population (red); US Census Bureau 2014-2018 5-Year Estimates.

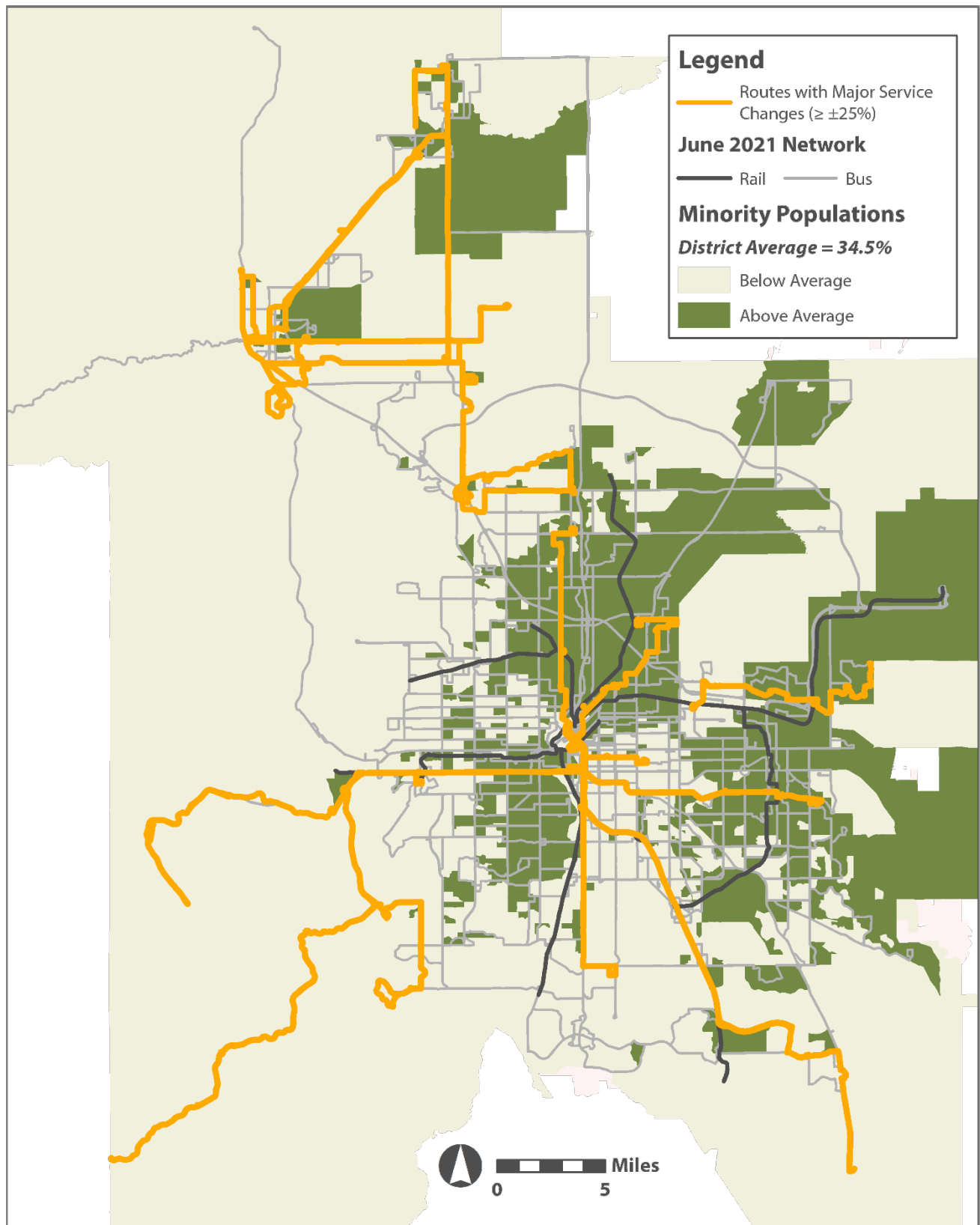


Figure 2. District block groups with above-average minority population (green); US Census Bureau 2014-2018 5-Year Estimates.

The June 2021 to September 2021 service changes are symbolized in Figure 3. Depiction of route and segment changes by severity of change, June 2021 to September 2021. This map provides a generalized view of where service is changing at the route pattern level. The June 2021 bus network is colorized according to the percentage change in the annual trips. Rail service (E, W, and N lines) had minimal changes and is excluded from shading. The September 2021 network includes several routes being modified (light green or teal) or reinstated or having large increases in service (dark blue).

Many reinstated routes are occurring in the periphery of the network and are regional in focus. These were some of the first and largest cuts to the bus network last year. This includes some of the mountain services from Evergreen and Conifer to Denver, for example as well as LD3 from Longmont and Route P from Parker. Some limited services were also reinstated such as 0L, 3L, and 116X among others. Most of the urban core routes, particularly those in the East Sector serving significant levels of equity populations, saw some increases in service, represented in green.

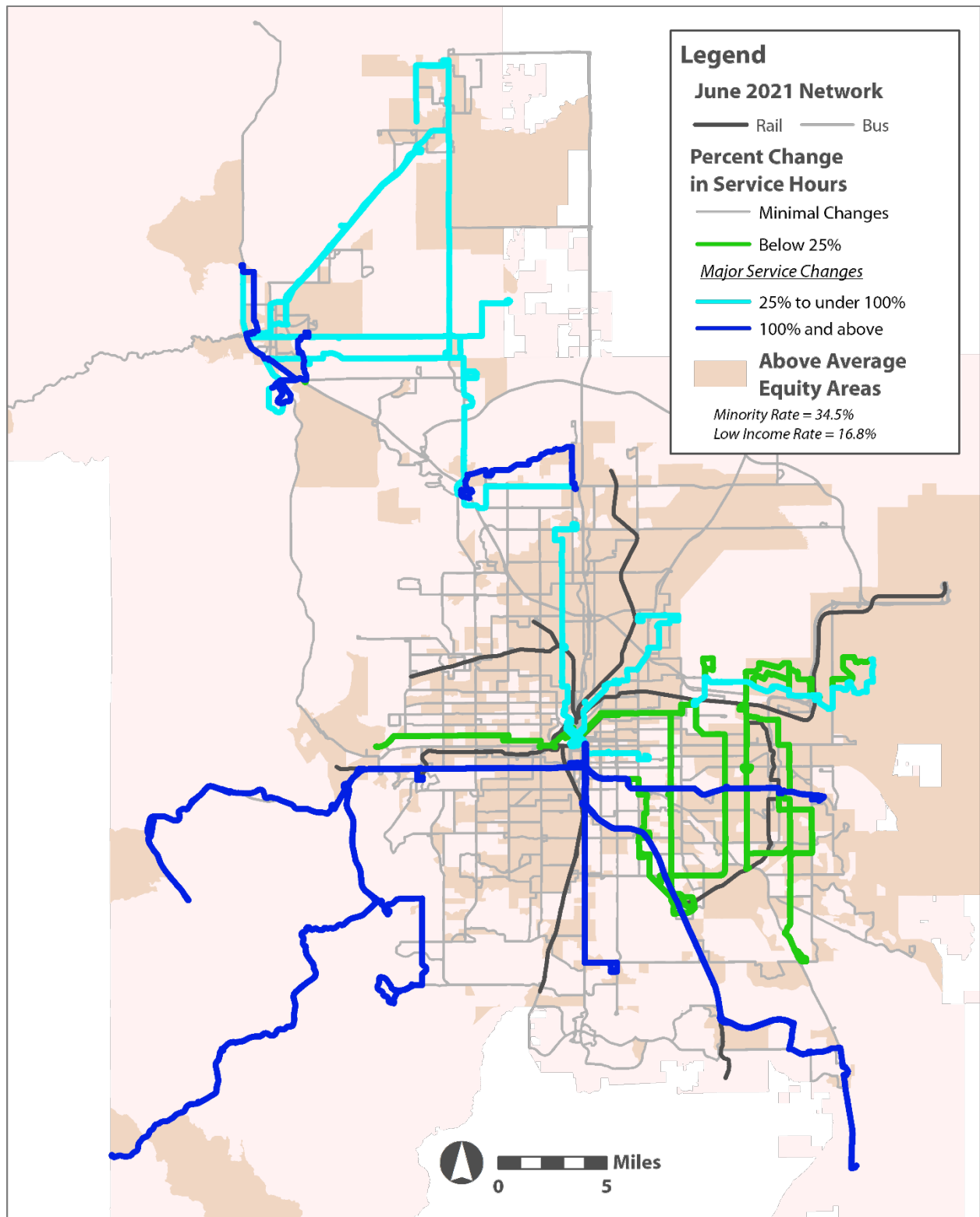


Figure 3. Depiction of route and segment changes by severity of change, June 2021 to September 2021

Summary of Findings

The network changes that are proposed between June 2021 and September 2021 include modifications to service that include additional trips and longer spans of service as well as reinstatements of routes previously suspended during the pandemic. These include limited stop overlays supplemental corridor local service as well as regional express routes from suburban and mountainous areas of the District. **The major service change increases were entirely invested on bus services**, and within bus service classes, these additional hours were distributed among CBD Local (22.4%), Urban Local (34%), Suburban Local (26.5%), and Regional (16.7%) bus routes. **None of the proposed changes involve reductions in service; all service changes in this runboard were additions of service through modifications or reinstatements of suspended service.**

Route-level Findings:

- Of the 31 total proposed service changes, **14 had potential disparate impact findings** and **2 had both disparate impact and potential disproportionate burden findings**.

Table 6 summarizes major service changes by change type, provides findings of potential disparate impacts and disproportionate burdens based on a comparative difference analysis, and provides the individual route service change.

Table 6. Summary of major service changes by change type and impact

Change Type	Number	Route	Potential Disparate Impact?	Potential Disproportionate Burden?	Service Change Pct
Modifications	10	10 East 12th Avenue	YES	NO	41%
	19	19 North Pecos	NO	NO	84%
	42	42 Montbello via Albrook / GVR	NO	NO	27%
	48	48 East 48th Avenue / Commerce City	NO	NO	29%
	120	120 120th Avenue / Brighton	YES	YES	79%
	204	204 Table Mesa / Moorhead / North 19th	YES	NO	193%
	206S	206S Boulder Junction/ Fairview H. S.	YES	NO	154%
	225	225 Boulder / Lafayette via Baseline	YES	NO	67%
	JUMP	JUMP Boulder / Lafayette via Arapahoe	YES	NO	70%
	SKIP	SKIP Broadway	YES	NO	81%
	BOLT	BOLT Boulder / Longmont	YES	NO	44%
	LD3	LD3 Longmont / Denver	YES	NO	53%
Reinstatements	0L	0L South Broadway Limited	YES	NO	n/a
	3L	3L East Alameda Limited	NO	NO	n/a
	116X	116X South Simms Express	YES	YES	n/a
	CV	CV Pine Junction / Conifer / Denver	YES	NO	n/a
	EV	EV Evergreen / Denver	YES	NO	n/a
	P	P Parker / Denver	YES	NO	n/a

Next Steps for Potential Disparate Impacts and Disproportionate Burden Findings

Given a potential disparate impact or disproportionate burden, RTD will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, RTD will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts/disproportionate burdens, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is and show that there are no alternatives that would have a less disparate impact on minority riders or disproportionate burden on low-income customers but would still accomplish the project or program goals.

Alterations to the initial proposed September 2021 service changes⁴ include adding improvements to the routes 42, 45, 49, and 121 (all serving high concentrations of minority populations) signifies RTD's response to ensure an equitable distribution of service improvements and to minimize impacts.

In addition to the systemwide-level findings below, RTD's on-going pandemic response, the substantial ridership decline, personnel impacts, resource allocation (human and capital), and recovery uncertainty serves as justification for maintaining the September service changes proposal.

Systemwide-level Findings:

- Of the over 350,000 people available to be served by stops within the service area of routes with major service changes, minority and low-income groups represented a higher share of population than District averages, indicating targeted services to equity groups.
- Of the 18 routes with major service changes, all but 1 route (P) serve above-average minority or low-income populations.
- When considering the demographics within the service areas of routes with major service changes and as a proportion to the District overall, both **minority and low-income populations received a greater increase in service (were positively impacted more) compared to non-equity populations**. Minority areas had a nearly +2% benefit above non-minority areas and low-income areas received over +6% compared to higher income areas.

Therefore, no system-level disparate impact or disproportionate burden is found related to the proposed major service increases in the September service change proposal.

⁴ <https://www.rtd-denver.com/service-changes/september-2021>

Appendix A: Systemwide Service Changes

September 2021 Service Changes

Table A-1

Change Type	Service Changes	
	Route	Description
Modified	10	Increase weekday rush hour service frequency to every 15 minutes between 6:30 a.m. – 9 a.m., and 3:30 p.m. – 6 p.m., between 9th/Clermont and downtown Denver.
	19	Increase weekday service frequency to every 30 minutes. Running time adjustments are also proposed to Increase on-time performance.
	20	Restore three hourly, weekday trips in the A.M. and P.M. rush hours between Union Station and the National Renewable Energy Laboratory.
	42	Restore selected early morning/late evening trips. Restore Route 42 weekday peak period 15 minute frequency in Montbello. Anticipated cost impact is estimated to be 20 weekday hours
	43	Restore select early morning and late-night trips.
	45	Restore selected early morning/late evening trips. Restore Route 42 weekday peak period 15 minute frequency in Montbello. Anticipated cost impact is estimated to be 10 weekday hours
	46	Begin weekday service 90 minutes earlier than existing schedule, with service beginning at approximately 6:15 a.m. in each direction
	48	Expand weekday service hours to 5 a.m. – 11 p.m., with 30-minute service frequency all day.
	65	Restore weekday service, with the route extending south from Southmoor Station to Ulster/Tufts in the Denver Tech Center, and north to 56th/Central Park serving Northfield High School.
	105	Restore select early morning and late-night trips.
	120	Implement the original, RTD Board-approved 120W route on weekdays with A.M. and P.M. rush hour service, with 60-minute service frequency.
	121	Restore 15 minute peak frequency north of Peoria Station through the Montbello neighborhood. Reinstate selected early morning and late-night trips. Anticipated cost impacts are estimated to be 20 weekday hours
	130	Restore the 4:46 a.m. southbound trip.
	153	Restore select early morning and late-night trips.
	204	Implement the previous, RTD Board-approved weekday schedule with 15-minute service frequency for A.M. and P.M. rush hours, and 30-minute frequency for midday. Proposed routing will operate between Table Mesa/Broadway and Front Range/Broadway. No changes are proposed for Saturday or Sunday schedules.
	206S	Implement 30-minute service frequency on weekdays during A.M. and P.M. rush hours between Arapahoe/55th and Fairview High School, allowing the provision of service to schools in Boulder.
	225	Restore the previous weekday schedule, with 15-minute service frequency for A.M. and P.M. rush hours, and 30-minute frequency midday.

Change Type	Service Changes	
	Route	Description
	DASH	Add short-turn trips during weekday A.M. and P.M. rush hours, with service between Downtown Boulder Station and Manhattan Circle.
	JUMP	implement the previous, RTD Board-approved weekday schedule. Operate between Downtown Boulder Station and BVSD Tech. Education Center with 15 minute service frequency on weekdays during A.M. and P.M. rush hours, and 30-minute frequency midday. Operate between Downtown Boulder Station and Lafayette Park-n-Ride at 30 minute service frequency during A.M. and P.M. rush hours, and 60-minute frequency midday. Operate between Downtown Boulder Station and Erie Recreation Center with 30-minute service frequency during A.M. and P.M. rush hours., with no midday service.
	SKIP	Restore the previous weekday schedule, with 10-minute service frequency for A.M. and P.M. rush hours, and 15-minute frequency midday.
	BOLT	Increase weekday service frequency to 30 minutes in the A.M. and P.M. rush hours, and 60 minutes for midday.
	LD3	Restore weekday service on LD3, with 60-minute service frequency during midday between 8th/Coffman Park-n-Ride and US•36 Broomfield Park-n-Ride.
	E Line	Reinstate Friday and Saturday evening service, expanding the service span to 2 a.m. Cost is an additional 12 hours Friday, and additional 12 hours for Saturday.
	W Line	Reinstate Friday and Saturday evening service, expanding the service span to 2 a.m. Cost is an additional 10 hours Friday, and additional 10 hours for Saturday.
	N Line	Minor running time adjustments are proposed to improve on-time performance.
Reinstated	0L	Reinstate weekday rush hour service between I-25•Broadway and Civic Center Station, with 15-minute service frequency between 6 a.m. – 9 a.m. and 3:30 p.m. – 6 p.m.
	3L	Reinstate rush hour service in the weekday mornings and afternoons, with three (3) daily trips in each direction. Proposed route will operate between Aurora Metro Center Station and Civic Center Station only.
	116X	Reinstate weekday service with three A.M. and P.M. rush hour trips. These trips will temporarily serve passengers boarding and aligning at Federal Center Station in lieu of the route 99L returning from suspension at this time.
	CV	Reinstate weekday service with three A.M. and P.M. rush hour trips. These trips will temporarily serve passengers boarding and aligning at Federal Center Station in lieu of the route 99L returning from suspension at this time.

Change Type	Service Changes	
	Route	Description
	EV	Reinstate weekday service with three A.M. and P.M. rush hour trips. These trips will temporarily serve passengers boarding and aligning at Federal Center Station in lieu of the route 99L returning from suspension at this time.
	P	Reinstate weekday service, with three trips in each direction.

Appendix B: Route Analysis Tables

Major Service Changes

BUS

Route 0L – South Broadway Limited

Reinstate weekday rush hour service between I-25 Broadway and Civic Center Station, with 15-minute service frequency between 6 a.m. – 9 a.m. and 3:30 p.m. – 6 p.m.

Route 0L South Broadway Limited				
Reinstated Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	27,557	9,035	29,092	7,499
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	98.6%	99.2%	98.8%	98.5%
% District Impacted	1.41%	0.84%	1.18%	1.50%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.27%	0.84%	1.06%	1.50%

Route 3L – East Alameda Limited

Reinstate rush hour service in the weekday mornings and afternoons, with three (3) daily trips in each direction. Proposed route will operate between Aurora Metro Center Station and Civic Center Station only.

Route 3L East Alameda Limited				
Reinstated Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	25,506	20,797	35,831	10,472
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	98.7%	98.1%	98.6%	97.9%
% District Impacted	1.31%	1.94%	1.45%	2.10%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.18%	1.94%	1.30%	2.10%

Route 10 – East 12th Avenue

Increase weekday rush hour service frequency to every 15 minutes between 6:30 a.m. – 9 a.m., and 3:30 p.m. – 6 p.m., between 9th/Clermont and downtown Denver.

Route 10 East 12th Avenue				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	31,772	8,178	31,756	8,194
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	98.4%	99.2%	98.7%	98.4%
% District Impacted	1.63%	0.76%	1.28%	1.64%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.47%	0.76%	1.15%	1.64%

19 – North Pecos

Increase weekday service frequency to every 30 minutes. Running time adjustments are also proposed to Increase on-time performance.

Route 19 North Pecos				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	21,474	21,494	31,188	11,779
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	98.9%	98.0%	98.7%	97.6%
% District Impacted	1.10%	2.01%	1.26%	2.36%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.99%	2.01%	1.13%	2.36%

Route 42 – Montbello via Albrook / GVR

Restore selected early morning/late evening trips. Restore Route 42 weekday peak period 15 minute frequency in Montbello. Anticipated cost impact is estimated to be 20 weekday hours

Route 42 Montbello via Albrook / GVR				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,019	23,683	23,735	6,968
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.6%	97.8%	99.0%	98.6%
% District Impacted	0.36%	2.21%	0.96%	1.40%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.32%	2.21%	0.86%	1.40%

48 – East 48th Avenue/ Commerce City

Expand weekday service hours to 5 a.m. – 11 p.m., with 30-minute service frequency all day.

Route 48 East 48th Avenue / Commerce City				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	12,541	15,527	19,982	8,086
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.4%	98.5%	99.2%	98.4%
% District Impacted	0.64%	1.45%	0.81%	1.62%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
<i>DI & DB Thresholds Are 90% Non-Equity % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	0.58%	1.45%	0.73%	1.62%

Route 204 – Table Mesa/Moorhead/North 19th

Implement the previous, RTD Board-approved weekday schedule with 15-minute service frequency for A.M. and P.M. rush hours, and 30-minute frequency for midday. Proposed routing will operate between Table Mesa/Broadway and Front Range/Broadway. No changes are proposed for Saturday or Sunday schedules.

Route 204 Table Mesa / Moorhead / North 19th				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	25,488	6,687	22,099	10,075
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	98.7%	99.4%	99.1%	98.0%
% District Impacted	1.31%	0.63%	0.89%	2.02%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
<i>DI & DB Thresholds Are 90% Non-Equity % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	1.18%	0.63%	0.80%	2.02%

Route 206S – Pearl/Manhattan/Fairview High (Arapahoe & 55th / Fairview H.S.)

Implement 30-minute service frequency on weekdays during A.M. and P.M. rush hours between Arapahoe/55th and Fairview High School, allowing the provision of service to schools in Boulder.

Route 206S Arapahoe & 55th / Fairview H. S.				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	10,001	2,388	10,428	1,961
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.5%	99.8%	99.6%	99.6%
% District Impacted	0.51%	0.22%	0.42%	0.39%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.46%	0.22%	0.38%	0.39%

225 – Boulder/ Lafayette via Baseline

Restore the previous weekday schedule, with 15-minute service frequency for A.M. and P.M. rush hours, and 30-minute frequency midday.

Route 225 Boulder / Lafayette via Baseline				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	20,925	5,540	18,266	8,199
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	98.9%	99.5%	99.3%	98.4%
% District Impacted	1.07%	0.52%	0.74%	1.64%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.97%	0.52%	0.66%	1.64%

JUMP – Boulder/Lafayette via Arapahoe

Implement the previous, RTD Board-approved weekday schedule. Operate between Downtown Boulder Station and BVSD Tech. Education Center with 15 minute service frequency on weekdays during A.M. and P.M. rush hours, and 30-minute frequency midday. Operate between Downtown Boulder Station and Lafayette Park-n-Ride at 30 minute service frequency during A.M. and P.M. rush hours, and 60 minute frequency midday. Operate between Downtown Boulder Station and Erie Recreation Center with 30-minute service frequency during A.M. and P.M. rush hours., with no midday service.

Route JUMP Boulder / Lafayette via Arapahoe				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	14,343	5,519	13,864	5,998
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.3%	99.5%	99.4%	98.8%
% District Impacted	0.74%	0.52%	0.56%	1.20%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.66%	0.52%	0.50%	1.20%

SKIP – Broadway (Boulder)

Restore the previous weekday schedule, with 10-minute service frequency for A.M. and P.M. rush hours, and 15-minute frequency midday.

Route SKIP Broadway				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	22,488	4,572	19,956	7,104
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	98.8%	99.6%	99.2%	98.6%
% District Impacted	1.15%	0.43%	0.81%	1.43%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.04%	0.43%	0.73%	1.43%

Route 116X

Reinstate weekday service with three A.M. and P.M. rush hour trips. These trips will temporarily serve passengers boarding and alighting at Federal Center Station in lieu of the route 99L returning from suspension at this time.

Route 116X South Simms Express				
Reinstated Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	16,171	4,029	17,356	2,845
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.2%	99.6%	99.3%	99.4%
% District Impacted	0.83%	0.38%	0.70%	0.57%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.75%	0.38%	0.63%	0.57%

Route 120W - 120th Avenue / Brighton

It is proposed to implement the original, RTD Board-approved 120W route on weekdays with A.M. and P.M. rush hour service, with 60-minute service frequency.

Route 120W 120th Avenue / Wagon Wheel P&R				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	6,379	2,430	7,468	1,340
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.7%	99.8%	99.7%	99.7%
% District Impacted	0.33%	0.23%	0.30%	0.27%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.29%	0.23%	0.27%	0.27%

BOLT – Boulder/ Longmont

Increase weekday service frequency to 30 minutes in the A.M. and P.M. rush hours, and 60 minutes for midday.

Route BOLT Boulder / Longmont				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	22,549	9,051	23,168	8,432
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	98.8%	99.2%	99.1%	98.3%
% District Impacted	1.16%	0.85%	0.94%	1.69%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.04%	0.85%	0.84%	1.69%

Route CV – Pine Junction/Conifer/Denver

Reinstate weekday service with three A.M. and P.M. rush hour trips. These trips will temporarily serve passengers boarding and aligning at Federal Center Station in lieu of the route 99L returning from suspension at this time.

Route CV Pine Junction / Conifer / Denver				
Reinstated Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	6,714	2,265	6,927	2,053
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.7%	99.8%	99.7%	99.6%
% District Impacted	0.34%	0.21%	0.28%	0.41%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.31%	0.21%	0.25%	0.41%

Route EV – Evergreen/Aspen Park/Denver

Reinstate weekday service with three A.M. and P.M. rush hour trips. These trips will temporarily serve passengers boarding and alighting at Federal Center Station in lieu of the route 99L returning from suspension at this time.

Route EV Evergreen / Denver				
Reinstated Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,736	2,332	7,942	2,125
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.6%	99.8%	99.7%	99.6%
% District Impacted	0.40%	0.22%	0.32%	0.43%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.36%	0.22%	0.29%	0.43%

Route LD3 – Longmont/Denver

Restore weekday service on LD3, with 60-minute service frequency during midday between 8th/Coffman Park-n-Ride and US 36 Broomfield Park-n-Ride.

Route LD3 Longmont / Denver				
Modified Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	9,803	3,882	11,233	2,453
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.5%	99.6%	99.5%	99.5%
% District Impacted	0.50%	0.36%	0.45%	0.49%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.45%	0.36%	0.41%	0.49%

Route P – Parker/Denver

Reinstate weekday service, with three trips in each direction.

Route P Parker / Denver				
Reinstated Service				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	12,786	3,595	13,721	2,660
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.3%	99.7%	99.4%	99.5%
% District Impacted	0.66%	0.34%	0.55%	0.53%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.59%	0.34%	0.50%	0.53%

**Board of Directors**

Chair – Angie Rivera-Malpiede, District C
 First Vice Chair – Lynn Guissinger, District O
 Second Vice Chair – Shelley Cook, District L
 Secretary – Vince Buzek, District J
 Treasurer – Paul Rosenthal, District E

Julien Bouquet, District G
 Bob Broom, District F
 Peggy Catlin, District N
 Erik Davidson, District I
 Bobby Dishell, District D

Shontel M. Lewis, District B
 Marjorie Sloan, District M
 Doug Tisdale, District H
 Troy Whitmore, District K
 Kate Williams, District A

BOARD OF DIRECTORS MEETING**REMOTE MEETING****July 20, 2021 at 5:30 PM****I. Call to Order**

Chair Rivera-Malpiede called the meeting to order at 5:30 p.m.

II. Pledge of Allegiance

Lead by Director Williams.

III. Roll Call - Determination of Quorum

Attendee Name	Title	Status	Arrived
Julien Bouquet	Director, District G	Remote	5:30 PM
Bob Broom	Director, District F	Remote	5:30 PM
Vince Buzek	Director, District J	Remote	5:30 PM
Peggy Catlin	Director, District N	Remote	5:30 PM
Shelley Cook	Director, District L	Remote	5:30 PM
Erik Davidson	Director, District I	Remote	5:30 PM
Bobby Dishell	Director, District D	Remote	5:30 PM
Lynn Guissinger	Director, District O	Remote	5:30 PM
Shontel Lewis	Director, District B	Remote	5:30 PM
Angie Rivera-Malpiede	Director, District C	Remote	5:30 PM
Paul Rosenthal	Director, District E	Remote	5:30 PM
Marjorie Sloan	Director, District M	Remote	5:30 PM
Doug Tisdale	Director, District H	Remote	5:30 PM
Troy Whitmore	Director, District K	Remote	5:30 PM
Kate Williams	Director, District A	Remote	5:30 PM

In addition to Directors and senior staff, there were 21 additional participants in attendance.

IV. Retiree Awards

None.

V. Public Participation

- Rosalie Ward
- Loren Hansen

VI. Committee Reports

Planning/Capital Programs & FasTracks Committee
Communications & Government Relations Committee
Civil Rights Committee
Operations & Customer Services Committee
Financial Administration & Audit Committee
GM Oversight & Performance Management

VII. General Manager Oversight and Performance Management Update

Presented by Committee Chair Vince Buzek.

VIII. Approval of Board Meeting Minutes of June 22, 2021 and Special Board Meeting Minutes of June 29, 2021

Motion: Director Williams made the motion to approve the minutes for the Board Meeting for June 22, 2021, and the Special Board Meeting Minutes of June 29, 2021.

Director Sloan seconded the motion.

Vote on the Motion: The motion passed with 15 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams) and 0 against.

Chair Rivera-Malpiede declared the motion **PASSED unanimously**.

IX. Chair's Report

X. General Manager's Report

Presented by Debra Johnson, General Manager and CEO.

XI. Public Hearing for 2021 Amended Budget

A. 2021 Amended Budget

For the Board of Directors to adopt Resolution No. ___, Series of 2021 to amend and appropriate funds to increase the 2021 Amended Budget by \$194.6 million to \$1,860.7 million.

Motion: Director Davidson made the motion to approve 2021 Amended Budget.

Director Cook seconded the motion.

Vote on the Motion: The motion passed with 15 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams) and 0 against.

RESULT: ADOPTED [UNANIMOUS]

MOVER: Erik Davidson, Director, District I

SECONDER: Shelley Cook, Director, District L

AYES: Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, Williams

Chair Rivera-Malpiede declared the motion **PASSED unanimously**.

XII. Unanimous Consent

Motion: Director Davidson made the motion to approve items B-E on the Unanimous Consent Agenda.

Director Broom seconded the motion.

Vote on the Motion: The motion passed with 15 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams) and 0 against.

RESULT: ADOPTED [UNANIMOUS]

MOVER: Erik Davidson, Director, District I

SECONDER: Bob Broom, Director, District F

AYES: Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, Williams

Chair Rivera-Malpiede declared the motion **PASSED unanimously**.

B. Internal Audit Function Charter

For the Board of Directors to approve the Internal Audit Function Charter.

C. September 2021 Service Change Proposal - Service Equity Analysis

For the Board of Directors to adopt the Title VI Service Equity Analysis report to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964.

D. Incorporation of Land Acknowledgement During Monthly Board Meetings

For the Board of Directors to incorporate a Land Acknowledgement during its monthly Board Meetings.

E. September 2021 Proposed Service Change

For the Board of Directors approve the September 2021 Service Change package as revised and summarized in Attachment A and to authorize the General Manager or her designee to execute contract amendments as necessary for private operators whose service is impacted by these changes.

XIII. Recommended Action

F. Third Amendment to GM and CEO Employment

For the Board of Directors to adopt a Third Amendment to the CEO and GM Employment Agreement to establish the annual performance appraisal and incentive compensation program for General Manager and CEO Debra A. Johnson as set forth in the proposed amendment.

Motion: Director Buzek made the motion to approve the Third Amendment to GM and CEO Employment.

Director Catlin seconded the motion.

Motion

To Amend: Director Williams made the motion to amend the Third Amendment to GM and CEO Employment that provide that for 2022, Ms. Johnson will be eligible for up to a 6% Base Salary adjustment.

Director Bouquet seconded the motion.

**Vote on
the Motion**

to Amend: The motion passed with 13 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Guissinger, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams and 2 against (Dishell and Lewis).

Chair Rivera-Malpiede declared the motion as amended **PASSED**.

Motion

To Amend: Director Dishell made the motion to amend the Third Amendment to GM and CEO Employment to state that the Board will engage a third party by competitive solicitation to conduct a compensation analysis that will be used to determine the percentage compensation increase for which Ms. Johnson will be eligible for the performance periods beginning January 1, 2023.

Director Tisdale seconded the motion.

**Vote on
the Motion**

to Amend: The motion passed with 15 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams) and 0 against.

Chair Rivera-Malpiede declared the motion as amended **PASSED unanimously**.

**Vote on
the Main**

Motion: The motion passed with 14 in favor (Bouquet, Broom, Buzek, Catlin, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams) and 1 against (Cook).

RESULT: **ADOPTED AS AMENDED [14 TO 1]**

MOVER: Bob Broom, Director, District F

SECONDER: Peggy Catlin, Director, District N

AYES: Bouquet, Broom, Buzek, Catlin, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, Williams

NAYS: Shelley Cook

Chair Rivera-Malpiede declared the motion **PASSED** as amended.

XIV. Executive Session

None.

XV. Old Business

None.

XVI. New Business

Chair Rivera-Malpiede and Director Dishell spoke.

XVII. Adjourn

Chair Rivera-Malpiede adjourned the meeting at 6:47 p.m.

The following communication assistance is available for public meetings:

- Language Interpreters
- Sign-language Interpreters
- Assisted listening devices

Please notify RTD of the communication assistance you require at least 48 business hours in advance of a RTD meeting you wish to attend by calling 303.299.2307

THE CHAIR REQUESTS THAT ALL PAGERS AND CELL PHONES BE SILENCED DURING THE BOARD OF DIRECTORS MEETING FOR THE REGIONAL TRANSPORTATION DISTRICT.

Attachment L

Covid-19 Service Change Equity Analysis, with Documentation of Board Approval

Title VI Service Equity Analysis

COVID-19 Service Changes

March 2021

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Executive Summary

The Federal Transit Administration (FTA) published guidance on April 7, 2020, to provide clarity how COVID-19 preparations impact certain FTA requirements. The guidance details when a Title VI service equity analysis must be performed for emergency service cuts and changes during the pandemic. Specifically, if a transit agency chooses to make any temporary changes permanent, the agency is then required to complete a service equity analysis to ensure the changes do not unfairly impact minority and low-income populations. Of note, a permanent change is any service change lasting longer than 12 months.

With steep declines in ridership and an uncertain return to higher demand, service reductions enacted within the January 2020 runboard have remained in place until the current March 2021 runboard. Moreover, RTD reduced service on April 19, 2020, to reflect the reality of declining ridership resulting from the COVID-19 pandemic. Because these changes are approaching the end of 12-month period, the FTA considers these changes permanent and requires an equity analysis to be performed. This document summarizes the detailed analysis of the service changes between April 2020 and April 2021 to ensure changes have not inequitably impacted minority and low-income populations.

Methodology

RTD's established Title VI program methodology defines the process to identify major service changes, disparate impacts, and disproportionate burdens. Analyses were performed at the route level, route block group, and network level, to identify any potential disparities in service changes based on race/ethnicity or income.

Major Service Changes

Changes to 103 existing bus route/patterns and rail lines in RTD's network of 167 services from April 2020 to April 2021 meet established thresholds for a major service change. The routes listed below had proposed reductions to service or were eliminated.

Route 0	Route 30L	Route 99	Route 204	Route 80L	Route LX1/LX2
Route 0L	Route 32	Route 100	Route 205T	Route 83D	MALLRIDE
Route 1	Route 36L	Route 104	Route 206	Route 87L	METRORIDE
Route 1W	Route 37	Route 104X	Route 206F	Route 99L	Route NB
Route 3L	Route 39L	Route 112	Route 206S	Route AA	Route P
Route 8	Route 44	Route 116X	Route 208F	Route AB2	Route RC
Route 9	Route 51	Route 120	Route 209	BOLT	SKIP
Route 10	Route 53	Route 122X	Route 225D/T	BOUND	Route Y
Route 15	Route 55	Route 125	Route 228	Route CS/CV	C Line
Route 16L	Route 59	Route 128	Route 236	Route DASH	G Line
Route 19	Route 66	Route 131	Route 324	Route ES/EV/EX	F Line
Route 20	Route 67	Route 135	Route 401	Route FF2 - FF7	R Line
Route 24	Route 72	Route 139	Route 403	Route GS	
Route 27	Route 76	Route 157	Route 483	Route J	
Route 28	Route 77	Route 169	Route 402L	JUMP	
Route 30	Route 80	Route 169L	Route 72W	Route LD1/LD2	

Additionally, 10 routes were new to the network and were almost all related to the new N Line commuter rail line that opened in September 2020. Other changes were restructures of existing service to better align service with demand.

Route 49	Route 88L	Route 93L	Route 104L	Route 120E
Route 120L	Route 520	Route NB1	Route NB2	N Line

Findings

When considering all routes in the RTD network, and compared to the average 31% reduction in service, low-income routes had a 13% smaller reduction compared to higher-income routes, and minority routes had a 29% smaller reduction than non-minority routes.

Of the 103 routes with major service changes or reductions, none had adverse impacts when comparing the service reductions of equity populations with those of non-equity populations. Low-income routes had a 13% lower reduction than higher-income routes and minority routes had 12% less of a reduction than non-minority routes.

Bus routes had a larger cut in service than rail modes, and of these bus routes with reductions in service, suburban local and regional route service classes had greater reductions or more eliminations than Central Business District (CBD) local and local route service classes. Limited stop routes were more likely to be eliminated than local routes.

Of routes that had major service changes, 14 had potential disparate impact findings and 27 had potential disproportionate burdens findings. Twelve routes had both.

Of routes that were eliminated, 12 had potential disparate impact findings and 38 had potential disproportionate burdens findings. Nine routes had both.

Of new services or restructures, 7 routes had potential disparate impact findings and 6 had potential disproportionate burdens findings. Three routes had both.

Corridor service changes within one-quarter mile of routes were reviewed for net service area changes, incorporating the network benefits of overlapping and/or intersecting services. This analysis found 30 of 40 routes had smaller reductions in service than the corridor's primary route, and all eliminated routes had net corridor service changes that reflected a smaller reduction in service, indicating the availability of other RTD services within a ¼ mile of the corridor, on average. However, only the corridor surrounding Route 37 was found to have a net service change under the major service change threshold of 25%.

Introduction

Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD) mission to provide mass transit service in the Denver Metro Area. An equitable mass transit system fairly distributes the benefits and adverse effects of transit service without regard for race, color, national origin, or low-income status. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 pertaining to environmental justice.

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

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Environmental Justice. In this circular, the FTA requires RTD to evaluate, prior to implementation, any and all service changes that exceed the established major service change threshold, to determine whether those changes will have a disproportionately negative impact on minority or low-income populations.

This equity analysis report has been prepared to document changes that occurred between the January 2020 and March 2021 runboards, representing the prior 12 months of service. Routes with major service changes include 40 major reductions, 63 eliminations, and 10 added services. In September of 2020, with the opening of the N Line, a highly anticipated commuter rail line to the north suburbs, supporting bus services were restructured. As a result, several routes underwent changes that on the surface appear to be major service changes (e.g., a single route split into two patterns, route name changes, replacement with other named routes, etc.). These changes and all others have been reviewed individually and in aggregate at the block group and system levels to identify actual major changes.

Service Change Philosophy

An equity analysis is triggered by proposed major service changes to the transit services provided by RTD. These changes include the addition of new routes, the elimination of existing routes, and changes to the alignment and trip frequency within existing routes. RTD has established principles to identify the service changes needed to meet the diverse travel needs of the residents of the District and maintain a high-performance, sustainable transit system.

RTD Service Changes Guiding Principles

- Service performance evaluation based on the RTD Service Standards;
- The effects on the overall integrity of the transit network and on transit dependent markets;
- The availability of alternative services to affected riders;
- Cost-effective distribution throughout the District and Family of Services and the ability to enhance service when possible;
- Title VI of the Civil Rights Act: benefits and services are provided without regard to race, color or national origin; also disparate effects on low income and minority populations; and
- Response to changes in the communities where services are provided.

RTD services are divided into various service classes depending on service type, route alignment, and frequency. Each service class has its own service standards derived from the performance of all routes within each class. RTD continually and comprehensively adjusts services in response to changes in ridership and operational performance of the transit system. It is also the District's responsibility to identify services that are underperforming and recommend modifications, curtailment, or cancellation of service as warranted. In keeping with Colorado Revised Statutes, RTD utilizes official service standards to establish performance metrics used to identify underperforming services on a class-of-service basis. The District uses these metrics to identify a series of service changes. Equity analyses examine the impact of the proposed major service changes on minority populations and low-income households at or below 150 percent of the Department of Health and Human Services Poverty Guidelines.

...The general assembly further finds that the district should be organized efficiently, economically, and on a demand-responsive basis and that the district should consider least-cost alternatives in discharging its responsibilities. The general assembly further finds that the farebox recovery ratio of the district must be improved so that resources once allocated for mass transportation can be made available for other surface transportation needs.

--Colorado Revised Statutes 32-9-119.7 Farebox Recovery Ratios -- Plans

RTD's Title VI Equity Analysis Policies

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a Major Service Change Policy, a Disparate Impact Policy, and a Disproportionate Burden Policy. Collectively, these policies provide foundational requirements for evaluating service change proposals for equity and compliance with Title VI. These policies and their applicable thresholds are listed below:

1. **Major Service Change:** A major service change is defined as a 25 percent addition or reduction in the service hours of any route that would remain in effect for twelve (12) or more months. All major service changes will be subject to an equity analysis that includes an analysis of adverse effects.
 - a. An **Adverse Effect** is defined as a geographical or temporal reduction in service that includes, but is not limited to, eliminating a route, shortening a route by eliminating segments, rerouting an existing route, and increasing headways. RTD shall consider the degree of adverse effects and analyze those effects when planning major service changes.
2. **Disparate Impact Analysis:** A major service change should not adversely affect a minority population 10 percent more than non-minority populations; this level of impact is considered a disparate impact.
3. **Disproportionate Burden Analysis:** A major service change should not adversely affect a low-income population 10 percent more than higher-income populations; this level of impact is considered a disproportionate burden. A low-income population is a group of households who are at or below 150 percent of the Department of Health and Human Services Poverty Guidelines.

If a proposed major service change results in a disparate impact or a disproportionate burden, RTD will consider modifying the proposed service change. RTD will then analyze the modification and make sure it removed the potential disparate impact or disproportionate burden. If a less discriminatory option cannot be identified and RTD can demonstrate a substantial legitimate justification for the proposed service change, the FTA may allow RTD to proceed with the proposed change.

Analysis

Data Sources & Methodology

Demographic data used for this analysis comes from the Census Bureau's American Community Survey (ACS) 5-Year Estimates for years 2014 to 2018 and is reviewed at the census block group geographic level. Analysis of RTD's network footprint and route service levels utilized Remix, a transit-planning software package combining data analysis with transit service planning tools. One key evaluation tool is the Title VI analysis used for service equity analyses which compares existing service, converted into annualized bus visits, or trips, to a set of proposed service changes. The annualized bus visits conversion is a helpful proxy for route service changes since any change in service levels will be proportional to the resultant annualized change in trips. Other data includes route alignments and block group geography. The linking of these datasets into a service-geographic-demographic combination relates equity populations with changes in service at a geographic level to aid in reviewing impacts.

The equity analysis is a three-tier process reviewing impacts first at an individual route level, then at an aggregated route block group level, and finally at a District/block group level, being careful to realize that analyses done at aggregate levels could hide major service change impacts occurring at a more granular level, so detailed analysis is done at each tier to avoid overlooking potentially adverse impacts on equity groups.

Low-income status for population within the District derives from the Census Bureau and is based on 150% of the United States federal poverty level (Department of Health and Human Services guidelines), based

on local context, which is an annual income of \$32,580 for a family of 3. Minority status was based on the non-white and Hispanic or Latino count of total population. The service area was based on the collection of block groups within the District boundaries set by RTD for Remix.

Route service area population was determined using a quarter mile “catchment area” centered around bus stops and rail stations. This catchment area was then used to calculate the percentage overlap of census block-based population underneath. For instance, if a catchment area contained 100% of the underlying block group, 100% of the population would be associated with the services within a quarter mile; if 50% of a block group was contained in the catchment area, only half of the underlying population would count as being included (ratios of population demographics would be unchanged).

Remix provides a count of trips in the “before” and “after” networks at the block group level and aggregated at the route pattern level but does not provide a change of trips by route by block group, which was needed for more detailed analysis at the route level. For this third tier of analysis, route alignments from RTD’s General Transit Feed Specification (GTFS) data were used to calculate the quarter-mile catchment area of every route to relate the route trip change data from Remix to individual block groups associated with each route.

Public Outreach Overview

January 2020 Service Changes

Five public meetings were conducted between September 25 and October 3, 2020 in Lafayette, Commerce City, and Longmont and at the Blake Administration Building Rooms T & D. The service change comments, and the details of these meetings are summarized in the October 22, 2019 consolidated agenda¹ starting on packet page 174. Table 1 captures the meeting locations and dates, the number of attendees and the common themes obtained from the comments.

Table 1: Five Public Meeting Details

Date & Time Location	Comment Themes	Number of Attendees
September 25th at 6pm Lafayette	Frequency and route pattern of Route LD1* , taxes on Lafayette residents, fare media issues	17
September 26th at 6pm Commerce City	Changes to Route 59 and Route 51	1
October 1st at 6pm Longmont	Earlier and later LX/LD trip and request for a route change, missed connections, Sunday service request, transfers/connections, additional comments for LD service	23
October 3rd at 12pm Denver	Route LD updates to shelters and schedules, Lafayette Park-n-ride improvements, connection issues between 72 and the 31 and 51, Parker Park-n-ride, Route 1 adjustments, safety crossing	7

¹ <https://rtd.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=2863&Inline=True>

	streets, N Line versus the Northwest rail clarification	
October 3rd at 6pm Denver	Approval of bus stop consolidation for Route 24, Mallride, Light Rail not matching schedules, fare payment machine issues, on time performance at 88%, scheduling, seniors at Yale station and general issues	10
		Total – 58

*Bolded comments were mentioned multiple times by different members of the public

The public was also notified of the ability to submit comments to service.changes@rtd-denver.com. The main comments were related to the opposition of the Route LD and Route LX service change. Other emails were general inquiries about the Route 37 and 46.

Covid-19 Service Reductions (April 2020)

RTD's traditional outreach and community engagement was not pursued due to the nature of the April 2020 service reductions. In short, the ability to devise and carry out a robust and inclusive outreach strategy was limited due to a compressed timeline and resource constraints. This was a result of the sharp decline in ridership attributed to the coronavirus pandemic. To summarize, the community engagement efforts, all outreach was conducted electronically via media releases, updates on the main RTD webpage, email blast to our customers and service alerts on the lines where service was reduced.

Customer Care staff received comments during the Covid-19 service reductions. These comments were compiled daily and sent to a team of RTD staff. Most comments related to Covid-19 service reductions were due to being passed up by a full bus, bus overcrowding, and operators or customers not wearing a mask. Additionally, there were concerns of rear door boarding for customers with a disability as well as specific route suspensions and eliminations.

Routes that received a high number of complaints for pass ups and overcrowding include routes 12, 15/15L, 16, and 0. Routes 43 and 121 did not receive the same volume of complaints regarding pass ups and overcrowding but were notably higher than other routes. These local routes have a higher number of minority and low-income customers compared to the system district average.

May 2020 Service Changes

Public Meetings

There were 19 public meetings conducted between February 19 and March 5, 2020 in Arvada, Aurora, Boulder, Centennial, Commerce City, Denver, Englewood, Golden, Highlands Ranch, Lafayette, Lakewood, Littleton, Parker and at the Blake Administration Building Rooms T & D. Meeting dates, times, and general locations, are provided below. Comments and further details from these meetings and the service change are summarized in the March 10, 2020 consolidated agenda² starting on packet page 8.

² <https://rtd.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=2924&Inline=True>

Table 2: Nineteen Public Meeting Details

Date & Time	Location	Date & Time	Location
February 19 th at 6pm	Boulder	February 25 th at 6pm	Denver
February 19 th at 12pm	Denver	February 25 th at 6pm	Highland Ranch
February 19 th at 6pm	Denver	February 26 th at 6:30pm	Lafayette
February 19 th at 6pm	Englewood	February 26 th at 6pm	Littleton
February 20 th at 12pm	Denver	February 26 th at 6:30pm	Lafayette
February 20 th at 6pm	Denver	February 28 th at 6pm	Arvada
February 20 th	Golden	February 29 th	Denver
February 21 st at 6pm	Centennial	March 2 nd	Littleton
February 24 th at 6pm	Lakewood	March 5 th	Parker
February 25 th at 6pm	Aurora		

Comment Summary

There was a strong opposition to the RunRide suspension due to the BolderBoulder's³ use and dependency on this service. Additional strong opposition was related to the Mallride, Route 99L, 32, 16L, 225, JUMP and 403 service cuts. Of these routes both the 99L and 16L had a noticeably larger number of people make comments regarding their reliance on these routes to have access to work and other essential trips. The Route LD trip cuts proved to be a concern for those in Lafayette as it was described that the current service is already minimal.

Several members of the public voiced concern regarding the R Line, 153, and 157 as they are all routes some local residents rely on. Residents in Aurora gave mention to already drastic changes in service that have occurred by RTD in the recent years. Due to issues with connectivity, transfers, and access the D Line was brought up. Some commenters wanted it to return to how it previously was and there was also a desire not to end the weekend trips this service provides. Also, two people brought up the conditions of the Lafayette Park-n-ride. RTD staff informed them it is currently in construction and is being worked on.

Additional comments were made regarding the operator shortage as commenters asked questions related to what is causing it, and how to solve the issues so cuts do not have to be made. RTD staff fielded questions to assure the public that resolutions are being identified.

Emails

The public was notified of the ability to submit comments to service.changes@rtd-denver.com. Emails were received from all parts of RTD's service area. Key routes of concern according to email volume included the Runride, Route 157, Route 153, and the R Line.

Mail

Cards with the words "No to Cuts" were received from residents in Aurora. The cards detailed service changes of concern that were reflective of emailed comments as well. The key routes of concern included Route 153, Route 130, Route 169, Route 157, H Line, E Line, and the R Line.

³ BolderBoulder is an annual Memorial Day Race Event

September 2020 – N Line Implementation

On July 14, 2020 the Board approved the recommended action to approve the implementation of the N line and subsequent changes related it. It was not considered a service change and modifications were nuanced changes with the Covid-19 plan.

Public Meetings

Five public hearings were held during the public comment period, which extended from August through September of 2019. The meetings were held in Thornton City Hall, Northglenn Senior Center, Blake Street Offices, and the City of Westminster. There were 60 participants in attendance at the public meetings total. Detailed comments from each meeting can be found in the July 14, 2020 consolidated agenda starting on packet page 17.⁴

In summary the main questions and concerns during the public comment period were the actual date of the 2020 N Line opening. Approximately seven people made remarks indicating doubts of predicted 2020 opening due to past delays. General questions regarding how the N Line will affect other routes were the next frequently asked questions. Additionally three people had concerns of the frequency of the 92/93L frequency. One person mentioned that the 88 on time performance was not accurate and one other person mentioned a desire to extend the route further. The 104L and 39L going away were of the most concern to those that spoke at the public meetings.

Email

The public was notified of the ability submit comments to service.changes@rtd-denver.com. One letter was received from the Westminster Mayor's office concerns and support for the proposal. Specifically there were concerns noted regarding the Route 120 boarding location due to the proximity of a high volume road and the AA projected to have a negative citizen reaction due to added travel time. A positive note regarding the 114 changes to added connections was also noted.

January 2021 Service Change

Notification was given to customers about the January 2021 service changes via rider alert emails about upcoming service changes and the opportunity to submit feedback by emailing service.changes@rtd-denver.com, faxing comments to 303.299.2227, or calling 303.299.6000.

Virtual Meetings and Events

RTD hosted a series of 5 virtual public outreach sessions in the first half of October 2020 to provide an overview of proposed service changes. Microsoft Teams meetings were limited to 250 participants per meeting. Four Microsoft Teams meetings were held with the option to participate via telephone or through the Microsoft Teams App. The table below shows the dates and number of attendees per meeting:

⁴ <http://rtd.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=2972&Inline=True>

Table 3: Five Virtual Public Sessions Details

Date & Time	Comment Themes	# of Attendees
October 7 th at 6pm	Suspension of service on Routes CS/CV, ES/EV and GS	33
October 8 th at 12pm	Pattern changes on C/D, E/F Lines and van pool options for CS/CV and ES/EV patrons	47
October 10 th at 10:30am	Routes CS/CV and GS and Route 205	12
October 12 th at 6pm (Spanish)	No comments or questions	3
		Total – 95

One in English and one in Spanish version of the recorded Microsoft Teams meetings were uploaded to the rideRTDco Youtube page and have been archived on the [Final January 2021 Service Change webpage](#)⁵. There were approximately 148 views of the pre-recorded videos, 109 of the English video and 39 views of the Spanish video, by the final date of the public comment period of October 14, 2020.

Additionally, a Facebook Live event was held October 12, 2020. This was the first time a Facebook Live event has taken place to inform customers about RTD's service change. Fifty-two people were recorded as the peak number of viewers during the Facebook Live event. Comments and questions ranged from the return to regular service on the system to explanation of the changes posed for Route 206. Since the date of the Live event to March 18, 2021 the video has received additional activity demonstrated in the following below:

Table 4: Facebook User Activity Post Live Event Details

Activity	Number
People reached (# of people who engage with content)	4,365
Total impressions (# of potential views)	5,028
Likes, comments, and shares	125
Post clicks	663

The recording of the Facebook Live event is still available for viewing on [RTD's Facebook Page](#)⁶ and garnered more views since the public comment period ended. Exact numbers of activity up until October 14, 2020 are undetermined.

Telephone

Customer service calls received that are related to service changes are forwarded to the Service Planning Department. The number of calls were notably much less than previous services changes.

Emails

Emails were sent to the RTD Service Change email and board members regarding the January 2021 Service Changes. The routes that received comments are summarized below:

⁵ <https://www.rtd-denver.com/service-changes/final-january-2021>

⁶ https://www.facebook.com/watch/live/?v=1423626311167760&ref=watch_permalink%20and%20garnered

Table 5: Service Changes Email Responses

Route	Abbreviated Customer Comments
12	Overcrowding please fix
20	Urge 30 min frequency, rely on route to go to work on Sunday
28	No to cut, no buses to between W Colfax and 38 th Ave
32	Return to go to museum and zoo
72	Suggest expanded schedule
77	Difficulty in daughter getting around
122x	Restore some routes or create hybrid route
204	Thanks for bringing back south bound during the week
205*	Many depend on Heatherwood loop, people rely on this route, critical to those without cars, blind residents who depend on service, serves commuters and senior citizens, West Gunnbarrel resident concern, low-income residents in Gunbarrel, request to only reduce frequency, disappointed, disabled neighbors in need of route, college students rely on route, strong objection, unfair
206	Start again so 2 middle school and 1 high school can be accessed
225	Reconsider route frequency for BVSD school start up, really inconvenienced, earlier bus suggestion
CV*	15 passenger minimum is keeping people from riding, do not cancel, many use the only 2 CV buses remaining, reconsider suspending, concern for mountain community riders not returning to service, key option for community, keep line going, keep option open for community, appreciate option during winter months, those living in the foothills concerned, recommend a reduced route schedule, essential personnel uses this, ridership is increasing, consider one service time, people in mountains do not have an alternative, cut off from foothill community, essential worker with no option to work from home, reinstate when people return to work
D Line	Reinstate as proposed, voice of support for resumption of service, please do this, in favor
EV/ES	Concern of not continuing route, use a smaller bus, consider decreasing instead of elimination
FF1	Need improvement
FF5	Missing mark with only 7am and 9am trip
GS	Hopes to return when pandemic ends, don't cancel
L Line	L Line: Thank you for not reducing
MALL	Add more due to overcrowding and dependence to get to work
P	Consider one am and pm trip
General/ Misc.	Aurora needs more options to airport, previously served by 169 which was great, offer Temporary opt-in option for CollegePass, have public bathroom near C to D train transfer point, sad to see RTD go downhill, AB and NB routes are important, financial shortfall is at fault of RTD

* Bolded comments were mentioned multiple times by different members of the public

Major Service Change, Disparate Impact, and Disproportionate Burden Analysis

Service changes made between January 2020 and March 2021 that resulted in a 25% or greater reduction or addition in service were categorized by equity grouping (minority or non-minority, low-income or higher income) for comparison. Routes were categorized as either equity or non-equity based on their identification within the January 2020 network using 2018 ACS 5-year demographic data. A comparative

equity analysis was completed to review the routes individually. This analysis identified the equity and non-equity populations within a route service area and compared those against the equity and non-equity populations of the District. If impacted equity populations within the route service area received 10% or greater impacts compared to non-equity populations, the route had a potential finding of disparate impact or disproportionate burden (depending on the impacted equity population) and was flagged for more detailed review of block groups within the route's service area. This was intended to identify network-level impacts that would indicate whether 25% or more service was changed for the underlying population groups due to overlapping or intersecting services.

MAJOR SERVICE CHANGE TEST

Identify routes with proposed major service changes (annual trips) of 25% or more

Changes by Transit Mode

When annual service changes were reviewed by mode, light rail had a 23% reduction of service over an annualized count. Commuter rail increased due to the introduction of N Line service and rail overall was reduced by nearly 16%. **Bus service was reduced by nearly 34%. The overall average for the system was a reduction of roughly 31%.**

Table 6. Summary of service changes by transit mode

Mode	Jan. 2020 Ann. Trips	Mar. 2021 Ann. Trips	Delta
<i>Light Rail Only</i>	<i>355,515</i>	<i>275,335</i>	<i>-22.6%</i>
<i>Commuter Rail Only</i>	<i>116,060</i>	<i>121,215</i>	<i>4.4%</i>
All Rail	471,575	396,550	-15.9%
All Bus	2,874,880	1,903,325	-33.8%
Overall	3,346,455	2,299,875	-31.3%

Major service changes between January 2020 and March 2021 included a total of 103 routes/lines that received major service reductions or were fully eliminated. Of these routes, 40 had major service reductions and 63 were eliminated.

Changes by Route Service Class

Service changes were reviewed by service class, categories generally describing the geographic location or service area (and unique performance thresholds) of each route. Service changes included all major service reductions or additions. Service classes include 4 categories for bus services: Central Business District (CBD) Local, Urban Local, Suburban Local, and Regional, a rail category, and 3 special services (MallRide, MetroRide, and the Englewood Trolley). **Generally, service cuts were more severe for suburban local and regional services, than CBD or Urban Local routes. Rail received the fewest cuts,** likely due to mandated service levels on commuter rail services and new N Line commuter service. CBD locals, and the related downtown services of MallRide and MetroRide as well as Regional services, had more reductions in service compared to Urban Locals.

Table 7. All Major Service Changes by Route Service Class

Service Class	Line Count	Jan 2020 Trips	Mar 2021 Trips	Change	Pct Change	Average Service Change
CBD Local	28	740,185	539,410	-200,775	-27.1%	-47.1%
Urban Local	34	846,050	660,795	-185,255	-21.9%	-35.5%
Suburban Local	52	697,565	404,195	-293,370	-42.1%	-62.9%
Regional	38	290,960	148,615	-142,345	-48.9%	-74.8%
Rail	12	471,575	396,550	-75,025	-15.9%	-27.3%
MallRide	1	249,120	131,950	-117,170	-47.0%	-47.0%
MetroRide	1	32,640	0	-32,640	-100.0%	-100.0%
Trolley	1	18,360	18,360	0	0.0%	0.0%
Total	167	3,346,455	2,299,875	-1,046,580	-31.3%	

Major Service Change Review

A complete listing of all service changes can be found in Appendix A. Changes were first reviewed in aggregate equity groupings of routes prior to individual review of routes, route block groups, and overall network levels; equity grouping comparison occurred at every level. Major service changes are categorized as the following:

- **Major Service Reductions or Eliminations** (a service reduction of 25% or more)
- **Major Service Increases/Restructuring** (service increases of 25% or more related to new or restructured service)

Major Service Change Reductions/Eliminations

Routes with major service changes included 40 routes with service reductions of 25% or greater and 63 eliminated routes, totaling 103 routes with major service reductions or eliminations (see table below).

Route 0	Route 28	Route 72	Route 131	Route 228	BOLT	SKIP
Route 0L	Route 30	Route 76	Route 135	Route 236	BOUND	Route Y
Route 1	Route 30L	Route 77	Route 139	Route 324	Route CS/CV	C Line
Route 1W	Route 32	Route 80	Route 157	Route 401	Route DASH	G Line
Route 3L	Route 36L	Route 99	Route 169	Route 403	Route ES/EV/EX	F Line
Route 8	Route 37	Route 100	Route 169L	Route 483	Route FF2 - FF7	R Line
Route 9	Route 39L	Route 104	Route 204	Route 402L	Route GS	
Route 10	Route 44	Route 104X	Route 205T	Route 72W	Route LX1/LX2	
Route 15	Route 51	Route 112	Route 206	Route 80L	MALLRIDE	
Route 16L	Route 53	Route 116X	Route 206F	Route 83D	METRORIDE	
Route 19	Route 55	Route 120	Route 206S	Route 87L	Route NB	
Route 20	Route 59	Route 122X	Route 208F	Route 99L	Route P	
Route 24	Route 66	Route 125	Route 209	Route AA	Route RC	
Route 27	Route 67	Route 128	Route 225D/T	Route AB2	Route LD1/LD2	

Major Service Change Increases

Ten routes were found to have major service change increases, due to their occurrence in the September 2020 runboard and their association with the introduction of the N-Line and related service restructuring. These included the following routes: N Line, Route 49, Route 88L, Route 93L, Route 104L, Route 120E, Route 120L, Route 520, Route NB1 and Route NB2.

Routes 49, 88L, 93L, 104L, and 120E/L are directly attributed to N-Line service. Route 520 was part of a route restructure from the elimination of Route RC and other changes in Brighton. Finally, the NB route to Nederland was split into two patterns, NB1 (primary route) and NB2 (seasonal).

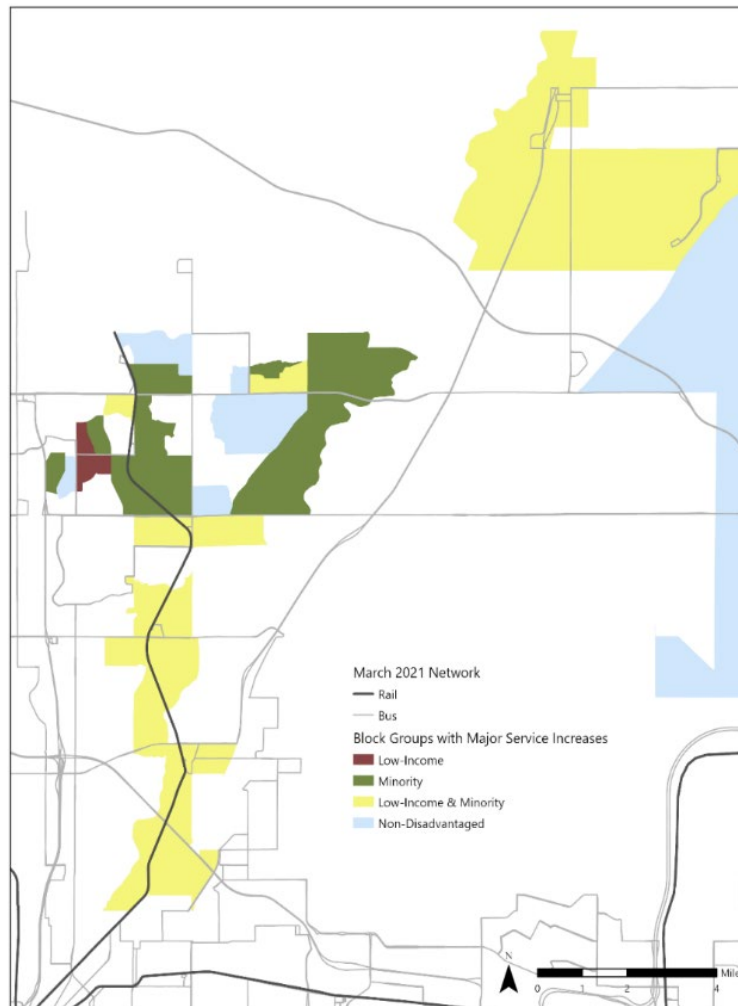


Figure 1. N-Line service area changes

Route-Level Analysis

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and

service increases are analyzed. For service increases, the analysis examines the extent to which the benefits of the improvements are inclusive of minority and low-income populations. For service decreases, the analysis examines the extent to which the adverse effects of the reductions are disproportionately borne by minority and low-income populations.

DISPARATE IMPACT AND DISPROPORTIONATE BURDEN ANALYSIS

For each route with a major service change, determine the percent of the route's impacted equity and non-equity populations comprising the District's equity and non-equity populations; if the difference is greater than 10% for equity populations, additional review is required for potential adverse impacts

In concert with RTD's Title VI policies, the demographics of each of major service change routes were reviewed for potential disparate impact (DI) or disproportionate burden (DB) findings. In summary, the review of these adverse impacts determined the following:

- **33 routes met the threshold for a potential disparate impact**
- **77 routes met the threshold for a potential disproportionate burden**
- **24 met thresholds for both impacts**

A complete listing of all potential DI and DB findings can be found in Appendix B.

Route-Block Group (Corridor) Analysis

This analysis reviews service changes reviewed at the route-block group level. This reviews the impacts of overlapping and intersecting services to determine the "net" service change within a route corridor. For instance, if an eliminated limited service operated in the same corridor as a local service, the net change determined from the route-block group analysis would group all the trips together to determine the net effect of the elimination. This provides an aggregate, high level indication of the average amount of service provided to the average user randomly across the route's corridor. It is an imperfect analysis, however, since it does not provide a true sense of alternative connections to the average user within that corridor based on how service levels changed for the primary route. However, because many of RTD's routes operate within a grid network, it can provide a sense of overall service levels.

ROUTE-BLOCK GROUP (CORRIDOR) ANALYSIS PROCESS

- 1. Identify routes with major service reductions or increases of 25% or greater and potential disparate impact or disproportionate burden findings***
- 2. Identify block groups within those route service areas and determine net (corridor) change in service***
- 3. Routes with alignment changes will compare old and new alignments for impacts***
- 4. Route corridor major service changes of 25% or greater (+/-) should be reviewed for potential DI or DB impacts as previously determined***

Of the 40 routes with major service reductions, the corridor “net” service review found 30 routes that had a lower net corridor change in service. Of the 63 eliminated routes, all routes had net corridor service changes with less of a reduction. Table 8 provides a summary of routes with major service changes, organized by service change type (reduction, elimination, addition), individual route service change percent between January 2020 and March 2021, and the “net” percent corridor service change. Routes with green shading are those where the net corridor service change is of a smaller magnitude than the individual route service change.

Table 8. Route Service Change Versus Corridor Service Change by Route and Service Change Type

Change Type	Number	Route	Service Change Pct	Corridor Change Pct
Major Service Reductions	0	0 South Broadway	-28%	-32%
	1	1 1st Avenue	-41%	-31%
	8	8 North Broadway / Huron	-37%	-35%
	9	9 West 10th Avenue	-48%	-31%
	10	10 East 12th Avenue	-41%	-29%
	15	15 East Colfax Avenue	-28%	-26%
	19	19 North Pecos	-37%	-35%
	20	20 20th Avenue	-35%	-28%
	24	24 University Blvd	-47%	-24%
	28	28 28th Avenue	-34%	-32%
	30	30 South Federal Blvd	-74%	-26%
	32	32 West 32nd Avenue / City Park	-39%	-33%
	37	37 Smith Road Industrial	-33%	-14%
	44	44 44th Avenue	-37%	-30%
	51	51 Sheridan Blvd	-37%	-29%
	59	59 West Bowles	-36%	-39%
	66	66 Arapahoe Road	-43%	-33%
	72	72 72nd Avenue	-58%	-33%
	76	76 Wadsworth Blvd	-39%	-31%
	83D	83D Cherry Creek / Parker Rd Limited	-46%	-31%
	100	100 Kipling Street	-49%	-44%
	112	112 West 112th Avenue	-39%	-51%
	135	135 Smoky Hill Road	-35%	-30%
	139	139 Quincy Avenue	-40%	-29%
	169	169 Buckley Road	-34%	-34%
	204	204 Table Mesa / Moorhead / North 19th	-56%	-43%
	228	228 Louisville / Broomfield	-41%	-41%
	324	324 Main Street	-55%	-52%
	402L	402L Highlands Ranch Parkway	-32%	-45%
	FF3	FF3 Flatiron Flyer	-97%	-34%
	FF5	FF5 Flatiron Flyer	-67%	-38%
	LD1	LD1 Longmont / Denver	-82%	-36%
	BOLT	BOLT Boulder / Longmont	-44%	-45%
	DASH	DASH Boulder / Lafayette via Louisville	-40%	-42%
	JUMP	JUMP Boulder / Lafayette via Arapahoe	-36%	-43%
	SKIP	SKIP Broadway	-27%	-41%
	BOUND	BOUND 30th Street	-40%	-47%
	MALLRIDE	MALLRIDE Free Mall Ride	-47%	-34%
	G	G Union Stn to Wheat Ridge Ward Sta	-37%	-33%
	R	R Lincoln Stn to Peoria Stn	-44%	-27%
Eliminations	0L	0L South Broadway Limited	-100%	-31%
	1W	1W 1st Avenue	-100%	-28%
	3L	3L East Alameda Limited	-100%	-32%
	16L	16L West Colfax Limited	-100%	-32%
	27	27 East Yale Av	-100%	-23%
	30L	30L South Federal Limited	-100%	-30%
	36L	36L Fort Logan Limited	-100%	-30%
	39L	39L North Colorado Lim	-100%	-30%
	53	53 North Sheridan	-100%	-46%
	55	55 Olde Town / Arvada Ridge	-100%	-47%

Change Type	Number	Route	Service Change Pct	Corridor Change Pct
Eliminations (continued)	67	67 Ridge Road	-100%	-49%
	72W	72W 72nd Avenue	-100%	-33%
	77	77 Ken Caryl Avenue	-100%	-68%
	80	80 80th Avenue	-100%	-37%
	80L	80L 80th Avenue	-100%	-39%
	87L	87L South Wadsworth Limited	-100%	-34%
	99	99 South Kipling Street	-100%	-55%
	99L	99L Federal Center / South Kipling Ltd	-100%	-41%
	104	104 West 104th Avenue	-100%	-47%
	104X	104X Commerce City / Denver Express	-100%	-32%
	116X	116X South Simms Express	-100%	-37%
	120	120 120th Avenue / Brighton	-100%	-25%
	122X	122X Wagon Road / Civic Center Express	-100%	-35%
	125	125 Youngfield / Ward	-100%	-60%
	128	128 Broomfield / Wagon Road	-100%	-52%
	131	131 East Iliff / Seven Hills	-100%	-28%
	157	157 CCA / Buckley	-100%	-30%
	169L	169L Buckley / Tower DIA Limited	-100%	-29%
	205T	205T 28th St / Gunbarrel / Heatherwood	-100%	-43%
	206	206 Boulder Junction/ Fairview H. S.	-100%	-54%
	206F	206F Boulder Junction/ Fairview H. S.	-100%	-47%
	206S	206S Boulder Junction/ Fairview H. S.	-100%	-42%
	208F	208F Iris / Valmont	-100%	-42%
	209	209 CU / Mohawk Dr	-100%	-50%
	225D	225D Boulder / Lafayette via Base	-100%	-43%
	225T	225T Boulder / Lafayette via Base	-100%	-43%
	236	236 Boulder Junction / US36 & Table Mesa	-100%	-50%
	401	401 Highlands Ranch / Mineral	-100%	-49%
	403	403 Wildcat Crosstown	-100%	-56%
	483	483 Parker Road - Lincoln Ave	-100%	-42%
	J	J Longmont / East Boulder / CU	-100%	-49%
	P	P Parker / Denver	-100%	-37%
	Y	Y Lyons / Boulder	-100%	-39%
	AA	AA Wagon Road / Denver Airport	-100%	-21%
	CS	CS Pine Junction / Conifer / Denver	-100%	-56%
	CV	CV Pine Junction / Conifer / Denver	-100%	-35%
	ES	ES Evergreen / Denver	-100%	-60%
	EV	EV Evergreen / Denver	-100%	-36%
	EX	EX Evergreen / Denver	-100%	-35%
	GS	GS Golden / Boulder	-100%	-43%
	NB	NB Nederland / Boulder	-100%	-40%
	RC	RC Brighton / Denver	-100%	-28%
	AB2	AB2 Boulder / Denver Airport	-100%	-47%
	FF2	FF2 Flatiron Flyer	-100%	-38%
	FF4	FF4 Flatiron Flyer	-100%	-38%
	FF6	FF6 Flatiron Flyer	-100%	-40%
	FF7	FF7 Flatiron Flyer	-100%	-35%
	LD2	LD2 Longmont / Denver	-100%	-36%
	LX1	LX1 Longmont I-25 Express	-100%	-35%
	LX2	LX2 Longmont I-25 Express	-100%	-36%
	METRORIDE	METRORIDE Free Metro	-100%	-34%
	C Line	C Union Stn to Littleton-Mineral Stn	-100%	-30%
	F Line	F 18th & California Stn to RidgeGate Parkway Stn	-100%	-29%
New Service & Restructuring	49	49 Denver/ Commerce City	--	-8%
	88L	88L Thornton / Commerce City Lim	--	2%
	93L	93L N Colorado Blvd Limited	--	-16%
	104L	104L Wagon Road / Denver Airport Limited	--	-21%
	120E	120E 120th Avenue	--	-33%
	120L	120L 120th Avenue Limited	--	52%
	520	520 Brighton	--	10%
	NB1	NB1 Nederland / Boulder	--	-40%
	NB2	NB2 Nederland / Boulder	--	-40%
	N	N Union Stn to Eastlake & 124th Stn	--	-22%

Network Analysis

A network analysis is not typical in RTD's equity analyses but was used to understand the large number of service changes occurring across the network. A network level analysis has potential to provide further understanding of changes to service levels for Title VI protected populations at aggregate levels.

While RTD has not established a formal policy for a network level analysis, the major service change threshold of 25% or greater used for individual route-level analyses was used as precedent to determine potential adverse impacts overall and to identify structural issues in areas requiring further review. Once average District thresholds for low-income and minority populations were established, subsequent equity analyses focused on the subset of District block groups that experienced major service changes of 25% or greater (additions or reductions in service), and whether equity block groups with major service changes experienced service changes of 10% or more compared to non-equity block groups. Routes with major service changes are later comparatively reviewed for potential adverse effects at route-block group levels (block groups within route service areas).

The analysis of the combined service changes identified the following:

- Systemwide, service was reduced by 31.8%, with almost one quarter of light rail service reduced (existing commuter lines were contractually obligated to be maintained and overall service improved due to new N Line service) and almost a third of overall bus service cut. Major service changes were applicable to the entire network.
- Due to cratering ridership and difficulty with staffing, 63 bus routes were eliminated, and 40 of 167 total routes had cuts of 25% or more, though the net effect is less when accounting for direct replacements (such as local routes substituting for limited routes) or changes related to the N Line opening.
- Comparing changes Districtwide and only for areas with major service changes greater than 25%, low-income block groups and minority block groups received fewer cuts than non-equity block groups, staying under the 10% difference threshold.
- At the route level, equity routes and non-equity routes⁷ were compared both District-wide and only for those with major service changes (in this case, nearly all changes were reductions when excluding new or replacement routes related to the N Line opening). The comparison found that while the system had drastic cuts, equity routes received far fewer reductions in service than non-equity routes: low-income routes saw 13% fewer cuts than higher-income, and minority routes received 29% fewer cuts than non-minority routes.

In aggregate, a review of all routes found no adverse impacts between equity and non-equity routes. Systemwide, although low-income routes had a greater number of annual trips reduced than higher-income routes, the reductions resulted in a 29% decrease in service compared with the 42% reduction in higher-income routes. The reductions to minority-classified routes were lower, both in terms of annual trips and percent change, than non-minority routes. As a result, minority routes were reduced 16%, compared to 44% for non-minority routes.

⁷ Based on existence of the route within the January 2020 network and the population within a quarter mile of bus stops or rail stations. 2018 5-Year estimates were used for population identification.

This pattern continued with routes that underwent major service reductions. Low-income routes underwent a decrease of 55% in annual trips compared with higher-income routes that underwent a 68% reduction. Minority routes underwent a 49% reduction in annual trips compared with 61% for non-minority routes.

In terms of major service increases, low-income routes will have 36% more trips than higher-income routes. Similarly, minority routes will have roughly 5 times as many trips than non-minority routes (74,290 more annually).

Table 9. Major service change analysis summary

Route Type	Jan 2020 Trips	Mar 2021 Trips	Change	Percent Change	Delta
All Routes					
Low-Income	2,853,935	2,037,150	-816,785	-29%	13%
Higher-Income	492,520	284,395	-208,125	-42%	
Minority	1,537,970	1,295,015	-242,955	-16%	29%
Non-Minority	1,808,485	1,004,860	-803,625	-44%	
Routes with Major Service Reductions					
Low-Income	1,454,915	655,655	-799,260	-55%	13%
Higher-Income	351,420	112,430	-238,990	-68%	
Minority	519,870	266,530	-253,340	-49%	12%
Non-Minority	1,286,465	501,555	-784,910	-61%	
Routes with Major Service Increases					
Low-Income	0	63,790	63,790	N/A	17,010
Higher-Income	0	46,780	46,780	N/A	
Minority	0	92,430	92,430	N/A	74,290
Non-Minority	0	18,140	18,140	N/A	

For the January 2020 to March 2021 network change, an analysis of all District block groups and their service levels was conducted to establish the baseline equity thresholds for low-income and minority populations and to determine the systemwide magnitude of impacts of the January 2020 to March 2021 service change. Block groups with low-income and minority populations at or above the District average are referred to in this analysis as “equity” block groups whereas higher-income and non-minority block groups are referred to as “non-equity” block groups.

NETWORK ANALYSIS PROCESS

Determine block groups at/above District averages for low-income population (16.8%) and minority population (35.4%)

Determine which block groups experienced service changes of 25% or more

Of block groups with a major service change, compare the difference in annual trips for equity versus non-equity block groups; if the difference is more than 10%, review for potential adverse impacts

There are 1,916 block groups defined as being wholly within or mostly within the District⁸. Using the 2018 5-Year ACS Estimates, total population residing within these block groups was calculated as well as the total minority population and total low-income population, calculated separately, to determine the District-wide low-income and minority rates which set the thresholds for which block groups are classified as above average. While the percent minority figure of 35.4% was derived by using the base population of the service area (3.019 million) the low-income population percentage of 16.8% is derived from a slightly smaller population figure. This is due to the smaller population whose poverty status the Census Bureau can determine⁹. The thresholds summarized in Table 0 yielded 751 (39% of all) block groups above the District average for low-income population, and 715 (37%) block groups above the District average for minority population.

Table 10. District averages; NTD 2018; ACS 2014-2018 5-Year Estimates

Service Area (sq. mi.)	Total Block Groups	Total Population	Percent Minority	Total Population (assessed)	Percent Low-Income
2,342	1,916	3,019,217	35.4%	2,974,027	16.8%

Table 11 summarizes the change in trips for equity and non-equity block groups District-wide, only block groups with major service reductions, and only those with increases. Most block groups across the District received substantial service reductions, however, systemwide **service reductions appear to have impacted equity groups modestly less than non-equity block groups, but service increases were mixed with higher-income and minority groups receiving more service than low-income and non-minority groups**. For block groups with a major service reduction, those with above average low-income population received around 3% fewer cuts, block groups with above average minority populations received around 5% smaller reduction in service compared to non-minority block groups. For block groups with major service increases, primarily due to the introduction of N line service and restructuring, higher-income block groups received more service. Minority block groups received nearly 12% more trips than non-minority block groups with major service increases.

⁸ Some block groups are not completely contained within the District boundaries due to differences in boundaries between the District and Census-defined geographies.

⁹ The total population whose poverty status is determinable/assessed is lower than the estimate of total population and results in a different base population used to determine low-income percent of population.

Table 11. Network service change analysis summary

	Change in Annual Trips	Delta
All Block Groups District-wide (1,916 block groups)		
Low-Income (751 block groups)	-27.1%	5.1%
Higher-Income (1,165)	-32.2%	
Minority (715)	-23.3%	10.7%
Non-Minority (1,201)	-34.0%	
Block Groups with a Major Service Reduction (-25% or greater) (1,100)		
Low-Income (367)	-38.3%	2.8%
Higher-Income (733)	-41.1%	
Minority (322)	-36.0%	5.4%
Non-Minority (778)	-41.5%	
Block Groups with a Major Service Addition (+25% or greater) (36)		
Low-Income (17)	+60.7%	21.8%
Higher-Income (19)	+82.5%	
Minority (24)	+73.9%	11.7%
Non-Minority (12)	+62.2%	

Figures 2 and 3 illustrate the location of above average low-income and minority block groups within the District. Low-income populations and minority populations appear to overlap in similar areas outside of central Denver, including most of Aurora, Commerce City, and Brighton, and areas east of Boulder, and areas southeast of Longmont. Low-income populations appear to have greater spread, with additional areas in the mountain communities and areas west of Downtown Denver.

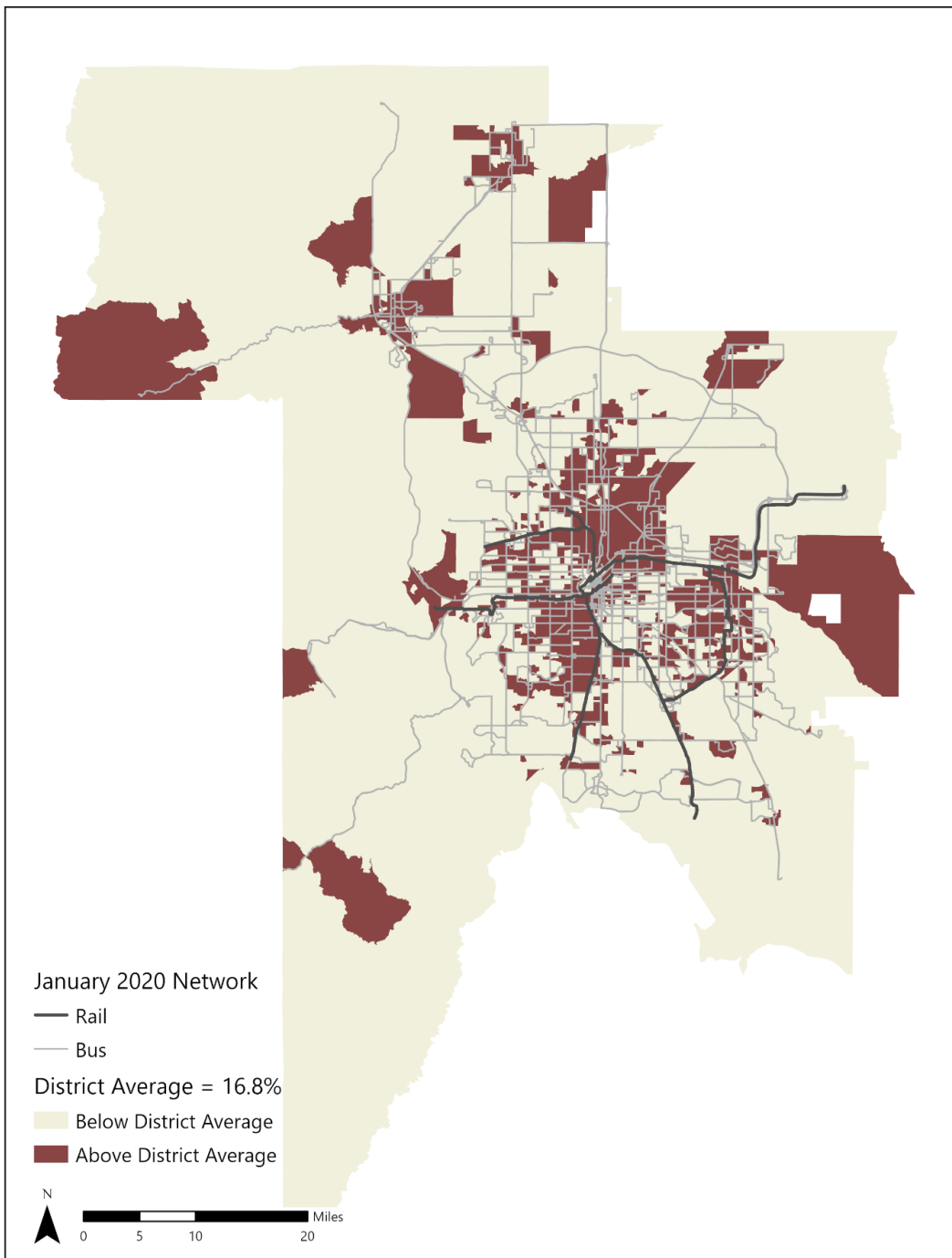


Figure 2. District block groups with above-average low-income population (red); US Census Bureau 2014-2018 5-Year Estimates.

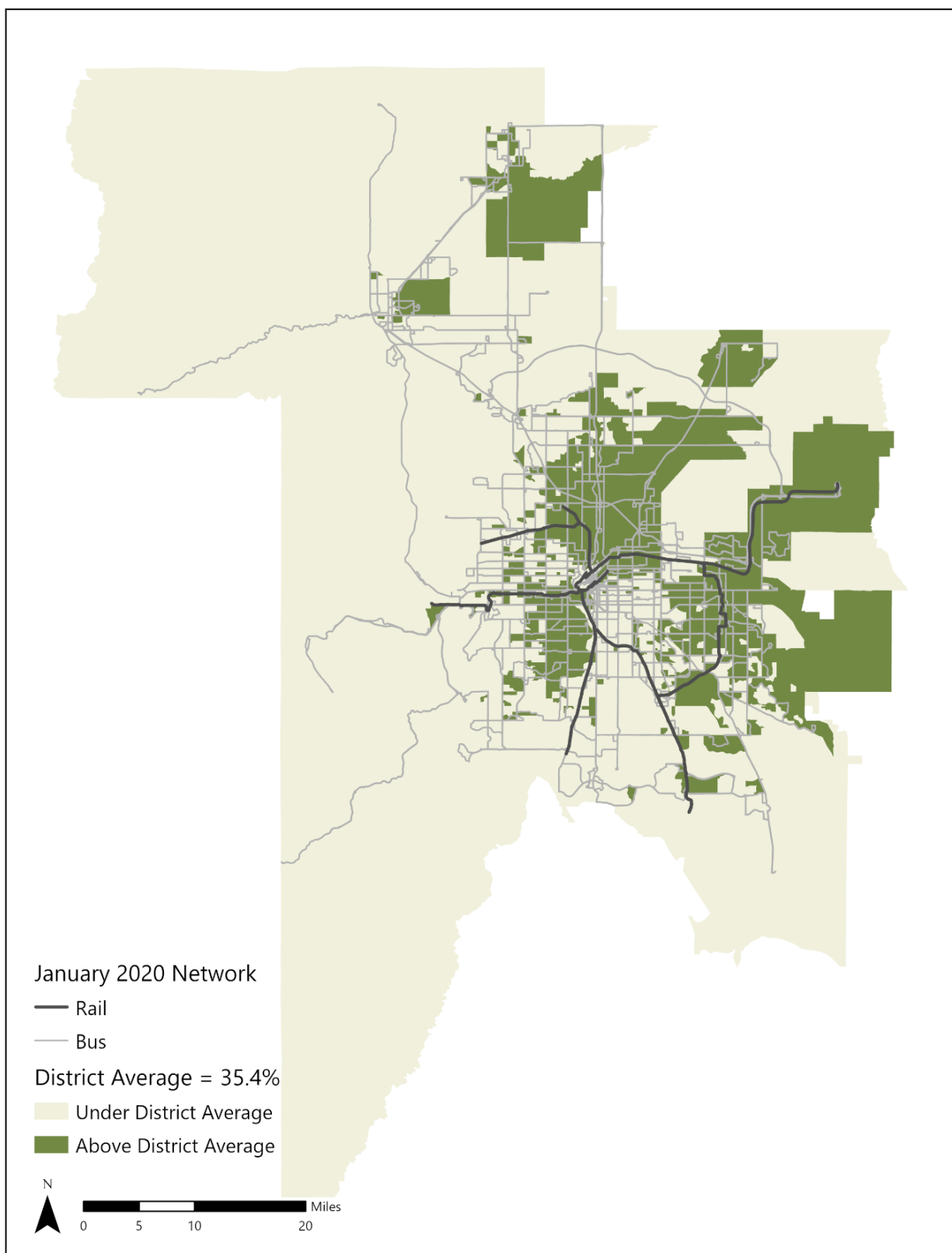


Figure 3. District block groups with above-average minority population (green); US Census Bureau 2014-2018 5-Year Estimates.

Figure 4 illustrates District block groups experiencing a 25% or greater reduction in annual trips due to proposed changes in the March 2021 network. These 1,100 block groups, constituting a majority, are primarily outside of the Denver urban core. There were 367 low-income block groups and 322 minority block group impacted by major service reductions.

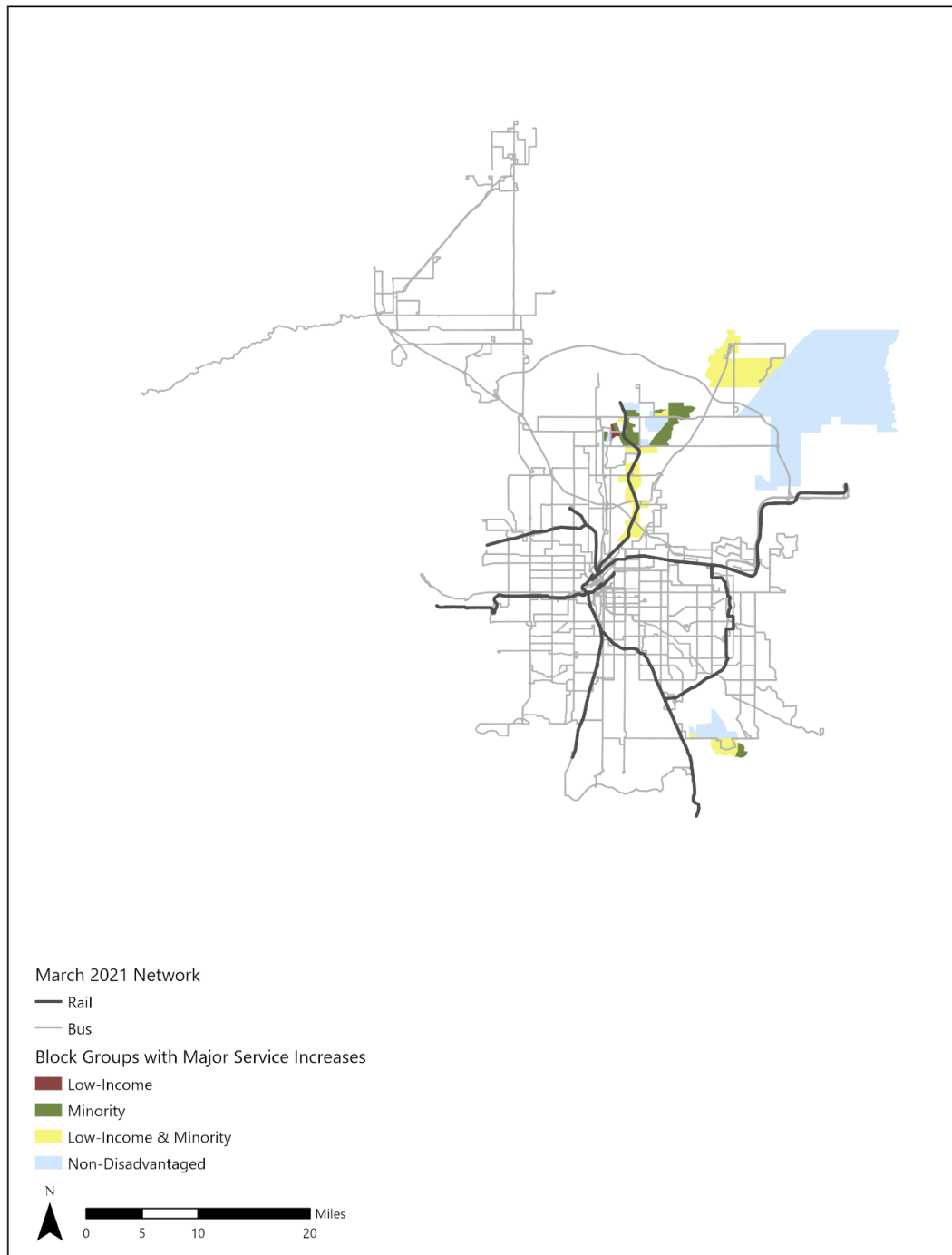


Figure 4. District block groups with major service increases of 25% or greater by equity statuses, January 2020 to March 2021 comparison

Figure 5 depicts 36 block groups that experienced major service increases. These are primarily located along the N line, which opened in the fall of 2020. Seventeen of the block groups are low-income and 27 are minority.

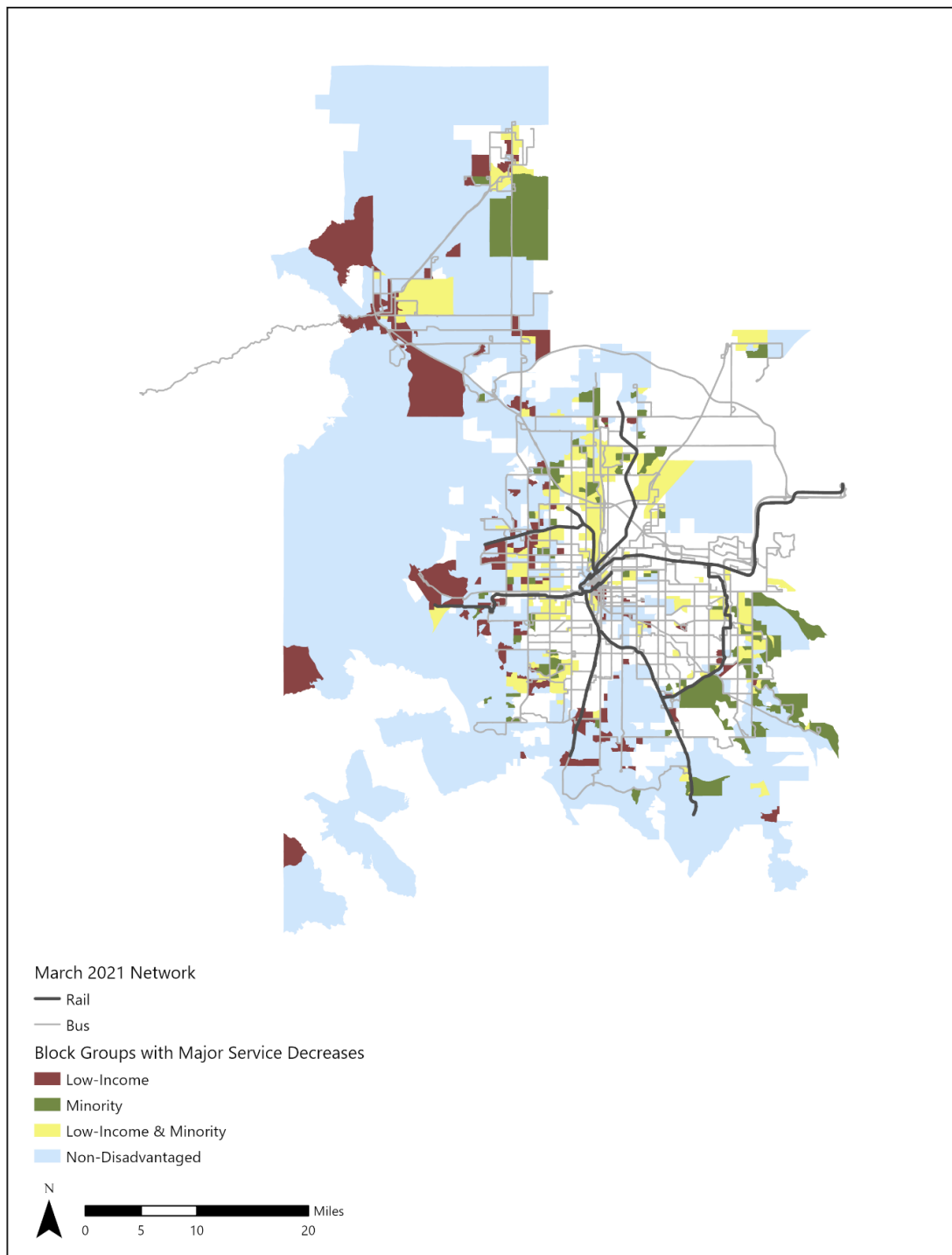


Figure 5. District block groups with major service decreases of 25% or greater by equity statuses, January 2020 to March 2021 comparison.

The January 2020 to March 2021 changes in annual trips by route are symbolized in Figure 6. The purpose of this map is to provide a generalized view of where service is changing at the route level. The March 2021 bus and rail network, as well as the eliminated routes from the January 2020 network are colorized according to the percentage change in the annual trips. The March 2021 network resulted in several routes being eliminated or truncated. These routes and the truncated segments are shown in red. In instances where several routes serve one corridor, the colors are layered to give preference to green down to red. Therefore, some truncated segments may not appear as they continue to be served by other routes. However, routes that have been eliminated entirely but are still served by other routes will outline the continuing service in red. An example of this scenario is the D-line, which is shown in green and outlined in red. This is the result of the elimination of the C-line with slight increases in D-line service.

As detailed in the map, the majority of route eliminations are occurring in the periphery of the network and regional in focus. This includes some of the connections between Longmont and Denver, for example. Most of the urban core routes will face limited reductions in service, represented in yellow, although some of the east to west bus connections in the urban core are eliminated. In terms of service increases or new routes, represented in green, much of it is due to the introduction of N-Line commuter rail service and its related bus services that serve the stations. Some of it is also due to the consolidation of overlapping services, such as the Nederland routes west of Boulder.

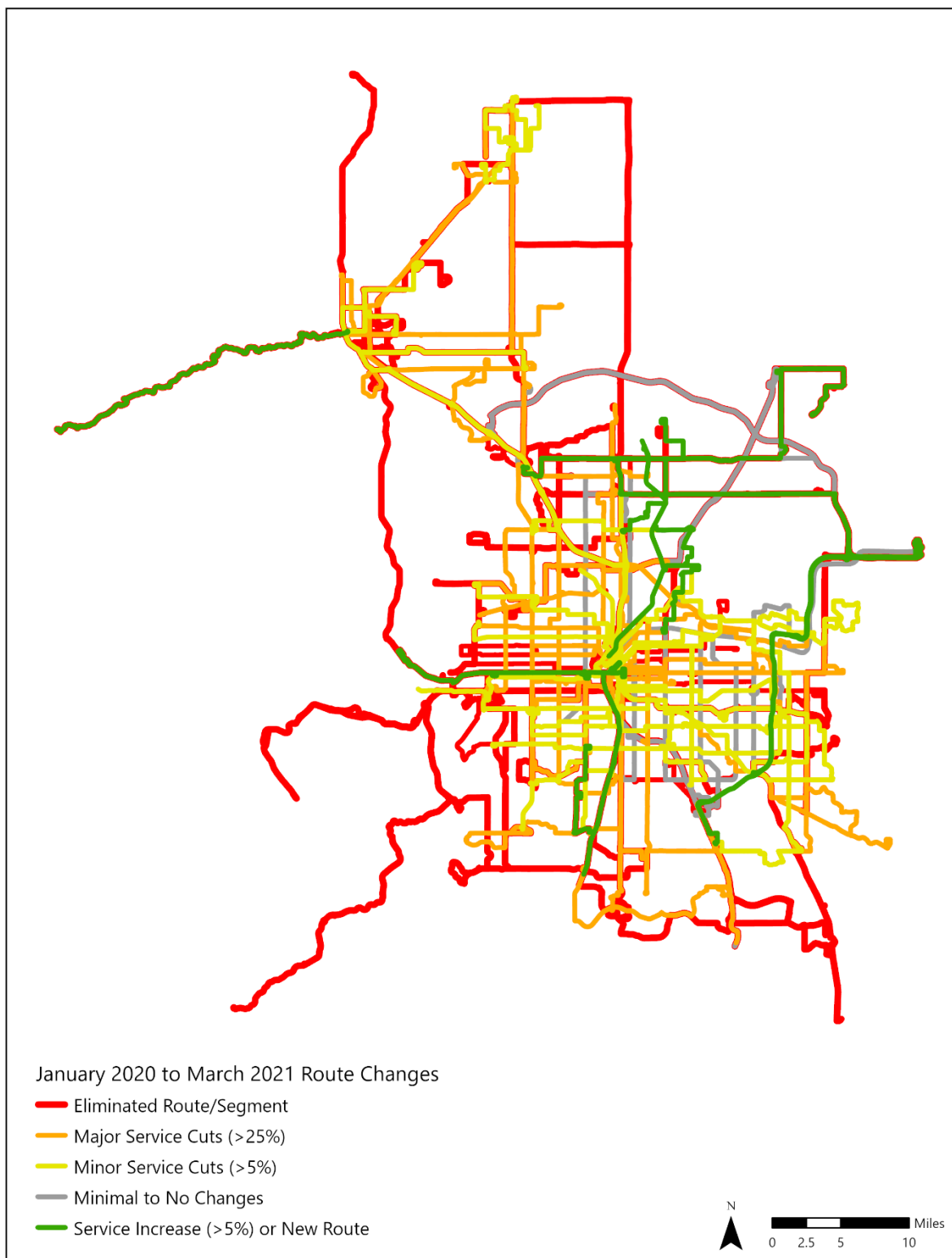


Figure 6. Depiction of route and segment changes by severity of change, January 2020 to March 2021

Summary of Findings

The primary objective of this equity analysis was to examine proposed changes to RTD's network at the individual route, route block group, and network route and block group levels, to determine if low-income and minority populations were more adversely impacted with changes than higher-income and non-minority populations. Future analyses may separate network analyses from traditional equity analyses and network analyses may rely on different service change thresholds and may be subject to additional refinements to identify potential adverse effects to equity populations. For instance, network changes could be compared to see how equity areas receive service over time or routes could be grouped into equity classes to also see how those routes are served longitudinally.

The network changes that occurred between January 2020 to March 2021 include the continuing service changes originally proposed in April 2020 to address the continuing impacts of ridership and revenue loss due to the current COVID-19 global pandemic. Ridership behavior has exhibited acute changes that are without historical precedent. Routes primarily serving office-type jobs (some CBD locals and particularly Regional services) have seen steep declines as have routes that primarily serve educational campuses since telecommuting and virtual learning have supplanted in-person interactions. Routes that provide service for predominantly equity populations, or those who may more likely be essential staff working in health care, public safety, government, food systems and other service sectors lacking remote work options, have had fewer reductions in ridership. As such, RTD has prioritized service changes that attempt to account for ridership demands while maintaining social distancing as much as possible on other routes.

A summary of potential disparate impacts and disproportionate burden findings include the following.

Disparate Impacts

An analysis of routes with major service changes found 40 routes with major service reductions, 63 eliminations and 10 new services. Of the routes with reductions, potential disparate impacts were found for 14 of the 40 routes, and of the 63 eliminated routes, 12 were found to have potential disparate impacts. (Twelve routes had both DI and DB findings.) Of routes categorized as new or restructured services, 7 were found to have potential disparate impacts.

When accounting for corridor service levels to determine a net service change across a route's corridor, some routes may have a smaller service change impact. This accounted for overlapping and intersecting services that may provide a similar level of service. Accounting for this review, only Route 37 had a smaller corridor service reduction comparing to the route level change. Of the eliminated routes, the AA route was found to have a service change under -25%.

Disproportionate Burden

An analysis of routes with major service changes found 40 routes with major service reductions, 63 eliminations and 10 new services. Of the routes with reductions, potential disproportionate burdens were found for 27 of the 40 routes, and of the 63 eliminated routes, 38 were found to have potential disproportionate burdens. (Nine eliminated routes had both DI and DB findings.) Of routes categorized as new or restructured services, 6 were found to have potential disproportionate burdens.

When accounting for corridor service levels to determine a net service change across a route's corridor, some routes may have a smaller service change impact. This accounted for overlapping and intersecting

services that may provide a similar level of service. Accounting for the corridor review, Route 37 had a smaller corridor service reduction comparing to the route level change like the potential disparate impact finding. No eliminated routes had a corridor service change under the major service change threshold. Table 12 summarizes major service changes by change type, provides findings of potential disparate impacts and disproportionate burdens based on a comparative difference analysis, provides the individual route service change, and the net corridor service change. Routes with green highlighted net corridor service change values indicate routes where the net corridor service change was found to be below the 25% threshold for major service changes. Note that this differs from green highlighting found in Table 8 which identified net corridor service changes that were simply lower in magnitude than the individual route service change.

Table 12. Summary of major service changes by change type and impact

Change Type	Number	Route	Potential Disparate Impact?	Potential Disproportionate Burden?	Service Change Pct	Corridor Change Pct
Major Service Reductions	0	0 South Broadway	No	Yes	-28%	-32%
	1	1 1st Avenue	Yes	Yes	-41%	-31%
	8	8 North Broadway / Huron	Yes	Yes	-37%	-35%
	9	9 West 10th Avenue	Yes	Yes	-48%	-31%
	10	10 East 12th Avenue	No	Yes	-41%	-29%
	15	15 East Colfax Avenue	Yes	Yes	-28%	-26%
	19	19 North Pecos	Yes	Yes	-37%	-35%
	20	20 20th Avenue	Yes	Yes	-35%	-28%
	24	24 University Blvd	No	No	-47%	-24%
	28	28 28th Avenue	No	Yes	-34%	-32%
	30	30 South Federal Blvd	Yes	Yes	-74%	-26%
	32	32 West 32nd Avenue / City Park	No	No	-39%	-33%
	37	37 Smith Road Industrial	Yes	Yes	-33%	-14%
	44	44 44th Avenue	Yes	Yes	-37%	-30%
	51	51 Sheridan Blvd	Yes	Yes	-37%	-29%
	59	59 West Bowles	No	No	-36%	-39%
	66	66 Arapahoe Road	No	No	-43%	-33%
	72	72 72nd Avenue	Yes	Yes	-58%	-33%
	76	76 Wadsworth Blvd	No	No	-39%	-31%
	83D	83D Cherry Creek / Parker Rd Limited	No	Yes	-46%	-31%
	100	100 Kipling Street	No	No	-49%	-44%
	112	112 West 112th Avenue	No	No	-39%	-51%
	135	135 Smoky Hill Road	No	No	-35%	-30%
	139	139 Quincy Avenue	Yes	No	-40%	-29%
	169	169 Buckley Road	Yes	No	-34%	-34%
	204	204 Table Mesa / Moorhead / North 19th	No	Yes	-56%	-43%
	228	228 Louisville / Broomfield	No	No	-41%	-41%
	324	324 Main Street	No	Yes	-55%	-52%
	402L	402L Highlands Ranch Parkway	No	No	-32%	-45%
	FF3	FF3 Flatiron Flyer	No	No	-97%	-34%
	FF5	FF5 Flatiron Flyer	No	Yes	-67%	-38%
	LD1	LD1 Longmont / Denver	No	Yes	-82%	-36%
	BOLT	BOLT Boulder / Longmont	No	Yes	-44%	-45%
	DASH	DASH Boulder / Lafayette via Louisville	No	Yes	-40%	-42%
	JUMP	JUMP Boulder / Lafayette via Arapahoe	No	Yes	-36%	-43%
	SKIP	SKIP Broadway	No	Yes	-27%	-41%
	BOUND	BOUND 30th Street	No	Yes	-40%	-47%
	MALLRIDE	MALLRIDE Free Mall Ride	No	Yes	-47%	-34%
	G	G Union Stn to Wheat Ridge Ward Sta	No	Yes	-37%	-33%
	R	R Lincoln Stn to Peoria Stn	Yes	Yes	-44%	-27%
Eliminations	0L	0L South Broadway Limited	No	Yes	-100%	-31%
	1W	1W 1st Avenue	Yes	Yes	-100%	-28%
	3L	3L East Alameda Limited	Yes	Yes	-100%	-32%
	16L	16L West Colfax Limited	No	Yes	-100%	-32%
	27	27 East Yale Av	No	No	-100%	-23%

Change Type	Number	Route	Potential Disparate Impact?	Potential Dispropor- tionate Burden?	Service Change Pct	Corridor Change Pct
Eliminations (Cont.)	30L	30L South Federal Limited	Yes	Yes	-100%	-30%
	36L	36L Fort Logan Limited	Yes	Yes	-100%	-30%
	39L	39L North Colorado Lim	No	No	-100%	-30%
	53	53 North Sheridan	No	No	-100%	-46%
	55	55 Olde Town / Arvada Ridge	No	Yes	-100%	-47%
	67	67 Ridge Road	No	No	-100%	-49%
	72W	72W 72nd Avenue	Yes	Yes	-100%	-33%
	77	77 Ken Caryl Avenue	No	No	-100%	-68%
	80	80 80th Avenue	Yes	Yes	-100%	-37%
	80L	80L 80th Avenue	No	No	-100%	-39%
	87L	87L South Wadsworth Limited	No	Yes	-100%	-34%
	99	99 South Kipling Street	No	No	-100%	-55%
	99L	99L Federal Center / South Kipling Ltd	No	No	-100%	-41%
	104	104 West 104th Avenue	No	No	-100%	-47%
	104X	104X Commerce City / Denver Express	No	No	-100%	-32%
	116X	116X South Simms Express	No	No	-100%	-37%
	120	120 120th Avenue / Brighton	Yes	No	-100%	-25%
	122X	122X Wagon Road / Civic Center Express	No	Yes	-100%	-35%
	125	125 Youngfield / Ward	No	No	-100%	-60%
	128	128 Broomfield / Wagon Road	No	No	-100%	-52%
	131	131 East Iliff / Seven Hills	Yes	No	-100%	-28%
	157	157 CCA / Buckley	Yes	Yes	-100%	-30%
	169L	169L Buckley / Tower DIA Limited	Yes	Yes	-100%	-29%
	205T	205T 28th St / Gunbarrel / Heatherwood	No	Yes	-100%	-43%
	206	206 Boulder Junction/ Fairview H. S.	No	Yes	-100%	-54%
	206F	206F Boulder Junction/ Fairview H. S.	No	No	-100%	-47%
	206S	206S Boulder Junction/ Fairview H. S.	No	No	-100%	-42%
	208F	208F Iris / Valmont	No	Yes	-100%	-42%
	209	209 CU / Mohawk Dr	No	Yes	-100%	-50%
	225D	225D Boulder / Lafayette via Base	No	Yes	-100%	-43%
	225T	225T Boulder / Lafayette via Base	No	Yes	-100%	-43%
	236	236 Boulder Junction / US36 & Table Mesa	No	Yes	-100%	-50%
	401	401 Highlands Ranch / Mineral	No	No	-100%	-49%
	403	403 Wildcat Crosstown	No	No	-100%	-56%
	483	483 Parker Road - Lincoln Ave	No	No	-100%	-42%
	J	J Longmont / East Boulder / CU	No	Yes	-100%	-49%
	P	P Parker / Denver	No	No	-100%	-37%
	Y	Y Lyons / Boulder	No	Yes	-100%	-39%
	AA	AA Wagon Road / Denver Airport	Yes	No	-100%	-21%
	CS	CS Pine Junction / Conifer / Denver	No	No	-100%	-56%
	CV	CV Pine Junction / Conifer / Denver	No	Yes	-100%	-35%
	ES	ES Evergreen / Denver	No	No	-100%	-60%
	EV	EV Evergreen / Denver	No	Yes	-100%	-36%
	EX	EX Evergreen / Denver	No	Yes	-100%	-35%
	GS	GS Golden / Boulder	No	Yes	-100%	-43%
	NB	NB Nederland / Boulder	No	Yes	-100%	-40%
	RC	RC Brighton / Denver	Yes	Yes	-100%	-28%
	AB2	AB2 Boulder / Denver Airport	No	Yes	-100%	-47%
	FF2	FF2 Flatiron Flyer	No	Yes	-100%	-38%
	FF4	FF4 Flatiron Flyer	No	Yes	-100%	-38%
	FF6	FF6 Flatiron Flyer	No	Yes	-100%	-40%
	FF7	FF7 Flatiron Flyer	No	Yes	-100%	-35%
	LD2	LD2 Longmont / Denver	No	No	-100%	-36%
	LX1	LX1 Longmont I-25 Express	No	Yes	-100%	-35%
	LX2	LX2 Longmont I-25 Express	No	Yes	-100%	-36%
	METRORIDE	METRORIDE Free Metro	No	Yes	-100%	-34%
	C Line	C Union Stn to Littleton-Mineral Stn	No	Yes	-100%	-30%
	F Line	F 18th & California Stn to RidgeGate Parkway Stn	No	Yes	-100%	-29%
New Service & Restructuring	49	49 Denver/ Commerce City	Yes	Yes	--	-8%
	88L	88L Thornton / Commerce City Lim	Yes	Yes	--	2%
	93L	93L N Colorado Blvd Limited	Yes	No	--	-16%
	104L	104L Wagon Road / Denver Airport Limited	Yes	No	--	-21%

Change Type	Number	Route	Potential Disparate Impact?	Potential Dispropor- tionate Burden?	Service Change Pct	Corridor Change Pct
New Service & Restructuring (Cont.)	120E	120E 120th Avenue	No	Yes	--	-33%
	120L	120L 120th Avenue Limited	Yes	No	--	52%
	520	520 Brighton	Yes	Yes	--	10%
	NB1	NB1 Nederland / Boulder	No	Yes	--	-40%
	NB2	NB2 Nederland / Boulder	No	Yes	--	-40%
	N	N Union Stn to Eastlake & 124th Stn	Yes	No	--	-22%

Appendix A: Systemwide Service Changes

January 2020 Service Changes

The January 2020 Service Changes were approved by the board on the October 22, 2019 during the Operations and Customer Service Committee as a recommended action. The recommended action and detailed summary of changes can be found in the FA&A/Ops Consolidated Agenda¹⁰ starting on packet page 165. Table A-1 provides the change type, route, and description of the board approved change.

Table A-1

Change Type	Service Changes	
	Route	Description
Improvement	65	Monaco: extend select peak trips to Northfield
	66	Arapahoe Road: extend select peak trips to Northfield
	LX	Longmont/Denver: add one northbound mid-day weekday trip
Reduction	62	Commerce City/Dick's SG Park: discontinue service, due to low ridership.
	LD/LX/225	Longmont/Denver: service restructure reducing service midday weekday and Saturday to pre grant levels.
Mixed service Improvement/service efficiencies	1	1 st Avenue: schedule adjustments
	3	East Alameda: extend morning trips to Colorado Blvd and remove Adams/Ellsworth deviation in the Cherry Creek area.
	15L	East Colfax Limited: Revise peak frequency.
	N/A	Southwest Plaza Terminal Relocation
Running time analysis/schedule adjustments	0L	South Broadway: Schedule adjustments on weekend service
	1	1 st Avenue: Schedule adjustments
	10	East 12 th Avenue Terminal change for CBA compliance
	11	Mississippi Avenue school tripper schedule adjustment
	30L	South Federal Limited schedule adjustment to improve on-time performance
	32	32nd Avenue/City Park extend trips to Ward Rd and I-70 park-n-Ride
	38	West 38 th Avenue extend trips to Ward Rd and I-70 park-n-Ride
	44	44 th Avenue extend trips to Ward Rd and I-70 park-n-Ride
	51	Sheridan minor schedule adjustments
	73	Quebec Street school tripper schedule adjustment
	157	CCA/Buckley: Running time adjustments
	AB	Airport/Buckley: Schedule adjustments for better passenger level distribution
	E Line	(Light Rail –Denver Union Station to Ridgeway Station) Schedule adjustment in the very early morning for better on-time performance

¹⁰ <https://rtd.igm2.com/Citizens/FileOpen.aspx?Type=1&ID=2863&Inline=True>

	FF-1	Flatiron Flyer: Schedule adjustments for better passenger level distribution
	L Line	(Light Rail – 30th& Downing to Convention Center) Schedule adjustment for better on-time performance
	NB	Nederland/Boulder: Schedule adjustments to allow for AM and PM service to Nederland High School, due to change of bell times
	R Line	(Light Rail –Peoria & Smith Rd Station to Ridgeway Station): Schedule adjustments, shifting evening trips to allow for better time spacing between the R, E and H line
	W Line	(Light Rail -Denver Union Station to Jefferson County Gov. Center/Golden Station) Schedule adjustments, to match Saturday and Sunday evening trips, creating a consistent weekend service
Bus Stop Consolidation	15	East Colfax
	24	University Boulevard
	27	East Yale Avenue
	35	Hampden Avenue
	46	Dahlia Street

May 2020 Service Changes

Due to an ongoing operator shortage, the May Service Change Proposal included a mix of service adjustments and reductions aimed to prevent missed trips and improve service reliability. The May 2020 Service Change proposals reflected the need to reduce the number of operators necessary to provide RTD's transit services, thereby better matching service offerings to the operator headcount at the time.

Changes were approved by the board on the March 10, 2020 during the Operations and Customer Service Committee as a recommended action. However, the service changes were not implemented due to Covid-19. Details of the service reductions can be found in the FA&A/Ops Consolidated Agenda¹¹ starting on packet page 3. Table A-2 provides the change type, route, and description of the board approved change.

Table A-2

Change Type	Service Changes	
	Route	Description
Reduction	0L	South Broadway: discontinue selected peak period trips
	1	1 st Avenue: reroute to Alameda Station and discontinue service east of Bannock Street
	32	32 nd Avenue/City Park: reduce service east of Downtown and discontinue service west of Wadsworth Boulevard
	55	Old Town/Arvada Ridge: discontinue service
	65	Monaco Parkway: reduce Sunday service frequency from 30 to 60 minutes
	67	Ridge Road: reduce service frequency weekday

¹¹ <https://rtd.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=2924&Inline=True>

	99	South Kipling: discontinue Saturday service
	99L	South Kipling: discontinue segment on Kipling between Ken Caryl PnR and Federal Center Station
	125	Youngfield/Ward: discontinue service north of Ward Road Station
	130	Yale/Buckley: reduce peak frequency from 15 to 30 minutes
	139	Quincy: discontinue weekday 5:13am, 5:41am eastbound, and 4:40am westbound; and Saturday 5:56am eastbound
	206	Pearl/Manhattan/Fairview High School: discontinue weekday mid-day service and remove route between Arapahoe/55 th Fairview High School midday
	236	Boulder Junction/US 36 & Table Mesa: discontinue service
	403	Lucent Boulevard: reduce service to hourly during peak period
	Jump	Boulder Lafayette via Arapahoe: reduce frequency to hourly weekday midday, east of 63rd/Arapahoe-Lafayette pnR
	MALL	16 th Street mall Shuttle: reduce peak frequency from 90 to 180 second frequency weekdays
	Y	Lyons/Boulder: reduce service to 1 AM and 1 PM peak trips
	116X	South Simms: discontinue one AM and one PM peak trip
	Broncos Ride	Discontinue service
	BuffRide	Discontinue service
Bus Stop Consolidation	Rockies Service	Discontinue service
	C Line	Littleton Mineral- Denver Union Station: add base period service on weekends
	D Line	Littleton Mineral- 18 th & California: discontinue service on weekends
	R Line	RidgeGate- Peoria & Smith Rd Station: reduce service frequency to 30 minutes weekday and weekends.
Mixed Service Improvements/Service Efficiencies	16	West Colfax: add service to offset loss of 16L to Golden and remove route segment to Federal Center
	27	East Yale Avenue: combine with Route 46 north of Yale Avenue and discontinue service south of Hampden
	Southmoor ParknRide	New south terminal
	46	South Dahlia Street: combine with Route 27 south of Yale Avenue, replacing former routing
	66	Arapahoe Road: cutback Route 66 from Arapahoe Crossing Shopping Center to Arapahoe at Village Center Station
	153	Chambers Road: extend Route 153 from Arapahoe Crossing Shopping Center to Arapahoe at Village Center Station
Running Time Analysis/Schedule Adjustments	15L	East Colfax Limited: running time analysis, schedule adjustments
	BOUND	Changing to summer service levels
	DASH	
	JUMP	

	SKIP	Interline changes as result of a change to summer service levels
	STAMPEDE	
	204	
	225	
	206/208 F	
	208/206 F	
	Y	

Covid-19 Service Reductions (April 2020)

Changes were approved by the board at a Special Board Meeting on March 24, 2020 as a recommended action to approve adjustments due to the dramatic decline in ridership as a result of Covid-19. A full detailed summary of changes can be found in the FA&A/Ops Consolidated Agenda¹² starting on packet page 2 and is also displayed in tables A3.1-A3.4 below.

Table A3.1

<u>Route</u>	<u>Name</u>	<u>Weekday Service</u>	<u>Saturday Service</u>	<u>Sunday Service</u>
0	Broadway	Saturday service, additional AM peak trips, no service 12:30am-4:00am	No service 12:30am-4:30am	No service 12:30am-4:30am
0L	Broadway Limited	No Service	--	--
1	1st Ave	Saturday service, May20 sched to Alameda Stn	May20 schedule, to Alameda Stn	May20 schedule, to Alameda Stn
3	Alameda	Saturday service	No change	No change
3L	E Alameda Ltd	No Service	--	--
4	Morrison Rd	Weekday service	No change	--
6	E 6th Ave	Saturday service	No change	No change
8	N Broadway	Saturday service, additional early AM trips	No change	No change
9	W 10th Ave	Saturday service, additional early AM trips	No change	No change
10	E 12th Ave	Saturday service	No change	No change
11	Mississippi Ave	Saturday service	No change	No change
12	Downing/N Washington	Saturday service	No change	No change
14	W Florida	Saturday service	No change	No change

¹² <https://rtd.igmp2.com/Citizens/FileOpen.aspx?Type=1&ID=2924&Inline=True>

15	East Colfax	Saturday service, no service 12:30am-4:00am	No service 12:30am-4:00am	No service 12:30am-4:00am
15L	East Colfax Limited	Saturday service	No change	No change
16	West Colfax	Saturday service, no service 12:30am-4:00am	No service 12:30am-4:30am	No service 12:30am-4:30am
16L	West Colfax Limited	No Service	--	--
19	North Pecos	Saturday service	No change	No change
20	20th Ave	Saturday service, additional AM peak trips	No change	No change
21	Evans Ave	Saturday service, additional early EB trip from Pierson/Jewell	No change	No change
24	University Blvd	Saturday service	No change	No change
27	East Yale Ave	No service	--	--
28	28th Ave	Saturday service, added AM eastbound and PM westbound peak trips	No change	No change
29	Riverbend	Saturday service, additional AM peak trips	No change	No change
30	South Federal	Saturday service, hourly frequency	Saturday service, hourly frequency	Sunday service, hourly frequency
30L	S Federal Limited	No service	--	--
31	Federal Blvd	Saturday service, no service 12:30am-4:00am	No service 12:30am-4:30am	No service 12:30am-4:30am
32	32nd Ave/City Park	Saturday service, May20 schedule, Wadsworth-DUS only, added AM EB and PM WB peak trips	May20 sched, Wadsworth-Union Station only	May20 sched, Wadsworth-Union Station only
34	Bruce Randolph Ave	Saturday service	No change	No change
35	Hampden Ave	Saturday service, no service after 9:30pm	No service after 9:30pm	No change
36	Fort Logan	Saturday service, additional AM peak trips	No change	No change
36L	Fort Logan Limited	No service	--	--
37	Smith Road Industrial	No service	--	--

38	West 38th Ave	Saturday service, no service after 12:30am	No service after 12:30am	No service after 12:30am
39L	N Colorado Limited	No service	--	--
40	Colorado Blvd	Saturday service, no service before 5:00am	No change	No change

Table A3.2

<u>Route</u>	<u>Name</u>	<u>Weekday Service</u>	<u>Saturday Service</u>	<u>Sunday Service</u>
42	Montbello/GVR via Albrook	Saturday service, no service 12:30am-4:00am	No service 12:30am-4:30am	No service 12:30am-4:30am
43	Martin Luther King Blvd	Saturday service, no service 12:30am-4:00am	No service 12:30am-4:30am	No service 12:30am-4:30am
44	44th Ave	Saturday service, added AM eastbound and PM westbound peak trips	No change	No change
45	Montbello/GVR via 51st	Saturday service, no service 12:30am-4:00am	No service 12:30am-4:30am	No service 12:30am-4:30am
46	South Dahlia St	Saturday service, May20 sched, to Southmoor	May20 schedule to Southmoor	May20 schedule to Southmoor
48	East 48th/Commerce City	Saturday service	No change	No change
51	Sheridan Blvd	Saturday service, added early AM trips, no service after 12:30am	No service after 12:30am	No service after 12:30am
52	W 52nd/S Bannock	Saturday service, extend one early AM trip from Arvada	No change	No change
53	North Sheridan	No service	--	--
55	Olde Town/Arvada Ridge	No service	--	--
59	West Bowles	Saturday service	No change	No change
65	Monaco Pkwy	Saturday service	No change	No change
66	Arapahoe Road	Saturday service, May20 sched, Arapahoe Station-Littleton only	May20 sched, Arapahoe Station-Littleton only	May20 sched, Arapahoe Station-Littleton only
67	Ridge Road	No service	No service	--

72	72nd Ave	Saturday service, starts at 6:00am	No change	--
73	Quebec St	Saturday service, starts at 5:30am	No change	No change
76	Wadsworth Blvd	Saturday service	No change	No change
77	Ken Caryl Ave	No service	--	--
80/80L	80th Ave	No service	--	--
83	Cherry Creek/Parker Road	Sunday service	Sunday service	No change
87L	S Wadsworth Limited	No service	--	--
88	Thornton/Commerce City	Saturday service	No change	No change
92	92nd Ave	Saturday service, with added AM peak, begins at 5:00am	No change	No change
99	South Kipling	No service	--	--
99L	Federal Center/S Kipling Ltd	No service	--	--
100	North Kipling	Saturday service	No change	No change
104	West 104th Ave	No service	--	--
104X	Commerce City Express	No service	--	--
105	Havana St	Saturday service	No change	No change
112	West 112th Ave	Saturday service, begins at 6:00am	No change	No change
116X	South Simms Express	No service	--	--
120	120th Ave/Brighton	Weekday service, 60 minute frequency	No change	--
120X	Wagon Road/Thornton Exp	Weekday service, begins at 5:00am, 15 minute peak frequency	No change	--
121	Peoria St	Saturday service, no service 12:30am-4:00am	No service 12:30am-4:30am	No service 12:30am-4:30am
122X	Wagon Road/Civic Ctr Exp	No service	--	--

125	Youngfield/Ward	No service	--	--
128	Broomfield/Wagon Road	No service	--	--

Table A3.3

<u>Route</u>	<u>Name</u>	<u>Weekday Service</u>	<u>Saturday Service</u>	<u>Sunday Service</u>
130	Yale/Buckley	Saturday service	No change	No change
131	Iliff	No service	--	--
133	Hampden/Tower	Saturday service	No change	No change
135	Smoky Hill Road	Saturday service	No change	No change
139	Quincy	Saturday service	No change	No change
145X	Brighton/Denver Airport	Saturday service	No change	No change
153	Chambers Road	Saturday service, May20 sched, extended to Arapahoe Station, no service 12:30am-4:30am	May20 sched, extended to Arapahoe Station, no service 12:30am-4:30am	May20 sched, extended to Arapahoe Station, no service 12:30am-4:30am
157	CCA/Buckley	No service	--	--
169	Buckley Road	Saturday service, no service 12:30am-4:30am	No service 12:30am-4:30am	No service 12:30am-4:30am
169L	Buckley Rd/Denver Airport	No service	No service	No service
204	Moorhead/N 19th	Saturday service	No change	No change
205	28th St/Gunbarrel	Saturday service, begins 6:00am	No change	No change
206	Manhattan/Fairview	No service	--	--
208	Iris/Valmont	Saturday service	No change	--
209	CU/Mohawk Drive	No service	--	--
225	Boulder/Lafayette via Baseline	Saturday service	No change	No change
228	Louisville/Broomfield	Saturday service	No change	No change

236	Boulder Junction/Table Mesa	No service	--	--
323	Skyline	Saturday service	No change	--
324	Main Street	Saturday service	No change	No change
326	Westside	Saturday service	No change	--
327	Eastside	Saturday service	No change	--
401	Highlands Ranch/Mineral	No service	--	--
402L	Highlands Ranch Parkway	Saturday service	No change	No change
403	Lucent Blvd	No service	--	--
483	Parker Road/Lincoln Ave	No service	--	--
Bound	30th Street	Saturday service	No change	No change
Dash	Boulder/Lafayette via Louisville	Saturday service, begins at 5:30am	No change	No change
Jump	Boulder/Lafayette via Arapahoe	Saturday service, begins at 6:00am	No change	No change
Skip	Broadway	Saturday service, begins at 5:30am	No change	No change
Free Metro Ride		No service		
16th St	16th Street Mall Shuttle	Saturday service	No change	No change
Bolt	Boulder/Longmont	Saturday service	No change	No change
CV	Conifer/Denver	Two AM peak and two PM peak trips	--	--
EV	Evergreen/Denver	Two AM peak and two PM peak trips	--	--

Table A3.4

<u>Route</u>	<u>Name</u>	<u>Weekday Service</u>	<u>Saturday Service</u>	<u>Sunday Service</u>
FF1	Boulder/Denver All Stops	Saturday service, added AM peak trips for 15 minute frequency. No service 12:30am-5:00am	No service 12:30am-5:00am	No service 12:30am-5:00am

FF2	Boulder/Denver Express	No service	--	--
FF3	Broomfield/Union Station	No service	--	--
FF4	Boulder Junction/Civic Center	No service	--	--
FF5	Boulder/Anschutz Campus	No service	--	--
FF6	Flatiron/Union Station	No service	--	--
FF7	US 36 & Sheridan/Civic Center	No service	--	--
GS	Golden/Boulder	Two AM peak and two PM peak trips each way	--	--
J	Longmont/Gunbarrel/CU	No service	--	--
LD1	Longmont/Denver	Two AM southbound and two PM northbound trips	--	--
LD2	Longmont/Denver Exp via US 287	No service	--	--
LD3	Longmont/Broomfield	Saturday service	No change	--
LX1	Longmont/Denver Exp via SH 66	No service	--	--
LX2	Longmont/Denver Exp via SH 52	No service	--	--
NB	Nederland/Boulder	Saturday service	--	--
P	Parker/Denver	No service	--	--
RC	Brighton/Denver	No service	--	--
RX	Brighton/Denver Express	Two AM southbound and two PM northbound peak trips	--	--
Y	Lyons/Boulder	No service	--	--
AA	Wagon Road/Denver Airport	Saturday service	No change	No change

AB	Boulder/Denver Airport	Saturday service	No change	No change
AT	Arapahoe County/Denver Airport	Saturday service, 5:10am from Nine Mile cancelled	No change, 5:10am from Nine Mile cancelled	No change, 5:10am from Nine Mile cancelled
C-Line	Littleton/Union Station	No service	- -	- -
D-Line	Littleton/Downtown	Sunday service	Sunday schedule	No change
E-Line	Ridgeway/Union Station	Sunday service	Sunday schedule	No change
F-Line	Ridgeway/Downtown	No service	- -	- -
H-Line	Florida/Downtown	Sunday service	Sunday service	Sunday service
L-Line	Five Points/Downtown	Sunday service	Sunday service	Sunday service
R-Line	Aurora/Lone Tree/Ridgeway	Sunday service, May20 sched, 30 minute freq	Sunday service, 30 minute freq	Sunday service, 30 minute freq
W-Line	Golden/Lakewood/Union Station	Sunday service	Sunday service	Sunday service
A-Line	Union Station/Denver Airport	No change	No change	No change
B-Line	Union Station/Westminster	No change	No change	No change
G-Line	Wheat Ridge/Arvada/Union Station	No change	No change	No change

September 2020 Service Change

Under normal circumstances the board approves September 2020 Service Changes at the July Operations and Customer Service Committee as a recommended action. Due to the nature of Covid-19, the Covid-19 service plan was still in place during the July meeting, however updates were made to the ongoing Covid-19 service plan. The list of changes to the Covid-19 service plan were provided to the board on July 14, 2020 and can be found on the FA&A/Ops Consolidated Agenda¹³ starting on packet page 71.

At the July 14, 2020 meeting, the Board approved the recommended action to implement the N line and subsequent changes related it. It was not considered a service change and modifications were nuanced changes with the Covid-19 plan.

¹³ <https://rtd.igmp2.com/Citizens/FileOpen.aspx?Type=1&ID=2974&Inline=True>

Modifications included:

- Introduction of the N Line Bus and Rail Service Plan under Covid-19 protocols, which provide Saturday Levels of service for both bus and rail. N Line rail will operate on a 30-minute all-day frequency
- Minor schedule adjustments to increase on-time performance on the following services: 15, 21, 30, 31, 83, 204, 326, NB, H, R and W Lines
- Return of school tripper service operated via Special Service Order, to maximize flexibility, as school districts complete their plans for the upcoming school year

January 2021 Service Change

The proposed January 2021 service adjustments were a mix of service enhancements, service reductions and service suspensions in order to maximize ridership within the very limited resources available to the District as a result of the financial shortfalls resulting from the COVID induced economic slowdown. The proposals included a mix of service adjustments that represent the redeployment of resources available during the COVID-19 service plan.

Weekday ridership on local bus service continued at levels approximately 45% of pre-COVID levels while ridership on Regional services, Flatiron Flyer services and light rail services saw weekday ridership declines of 75%-85%. These ridership numbers were largely affected by reduced commuter activity and reduced employment center occupancy.

Overall, the proposals redirected resources from services that were underperforming to services that have passenger capacity challenges due to limits set by social/physical distancing policies that limit capacity on each RTD vehicle to approximately 30% of pre-COVID capacity. Additionally, the proposals modified service patterns and levels of service on rail corridors to more effectively match service to ridership demand.

The January 2021 service changes were approved by the board on the October 20, 2020 during the Operations and Customer Service Committee as a recommended action. A list of the approved changes with a brief summary are included in the Table A-4 below. A full detailed summary of changes can be found in the FA&A/Ops Consolidated Agenda¹⁴ starting on packet page 144.

Table A-4

Change Type	Service Changes	
	Route	Description
Reduction	20	20th Avenue: decrease frequency of the Route 20 from 30 min to 60 min on weekends
	51	Sheridan Boulevard: reduce weekend service span by eliminating the last three trips of the evening on weekends

¹⁴ <https://rtd.igmp2.com/Citizens/FileOpen.aspx?Type=1&ID=3014&Inline=True>

	205	28thSt/Gunbarrel/Heatherwood: suspend Route 205 service between Lookout Rd/Gunpark and Heatherwood/Devonshire.
	225/225D/225E	Boulder/ Broomfield via Baseline & US287: reduce Route 225 service daily to hourly in the mid-day, reduce the service span to 7am –8pm on Saturdays and Sundays
	228	Louisville/ Broomfield: reduce Route 228 service span weekdays to 8am –9am due to very low ridership
	CS/CV	Pine Junction/Conifer/Denver: suspend Route CS/CV, between Pine Junction and Denver, to be replaced by DRCOG coordinated Car-or Van-pool options
	ES/EV	Evergreen/Aspen Park/Denver:suspend Route ES/EV between Evergreen and Denver to be replaced by DRCOG coordinated Car-or Van-pool options
	GS	Golden/Boulder: suspend Route GS, between Boulder and Golden and to replace it with RTD paid Uber/Lyft service partnership and/or Taxi Voucher program. Consideration should also be given to DRCOG coordinated Car-or Van-pool options
	MALL	16 th Street Mall/Free Mall Ride: reduce Mall frequency in the evening from 7.5 minutes to 15 minutes. Reallocate resources to improving weekday AM peak frequency to every 6 minutes
	H Line	Reduction of frequency and service span daily
	R Line	Reduction of both service frequency and service span, truncate R Line service at Lincoln Station
	W Line	Reductions to both service frequency and service span
Mixed Service Improvements/Service Efficiencies	28	28 th Avenue: truncate western segment of the Route 28 at Wadsworth Boulevard/26thAvenue and extended to the 30th& Downing LRT Station
	C/D Lines	Consolidate C and D Line patterns into D Line to 18 th & California from Littleton-Mineral Station with reductions in service span and alterations to scheduled service frequency
	E/F Lines	Consolidate E and F lines to run the E line pattern of service to DUS from RidgeGate with reductions in service span and alterations to scheduled service frequency
Service Improvements	16	West Colfax: increase in service levels to address current capacity shortfalls that are currently addressed using extra board operators.
	31	Federal Boulevard: increase in service levels to address current capacity shortfalls that are currently addressed using extra board operators
Running Time Analysis/Schedule Adjustments	0	South Broadway: load analysis
	15	East Colfax: running time adjustments
	15L	East Colfax: running time adjustments
	16	West Colfax: running time adjustments

	28	28 th Avenue: running time adjustments
	34	Bruce Randolph Ave: running time adjustments
	44	44 th Avenue: running time adjustments
	48	East 48thAvenue/Commerce City: running time adjustments
	65	Monaco Parkway: minor schedule adjustment on Sunday
	83	Cherry Creek/Parker Road: running time adjustments
	88	88 th Avenue: schedule adjustment to improve on-time performance
	88L	Thornton/Commerce City Limited: schedule adjustment to improve on-time performance
	92	92 nd Avenue: earlier Saturday morning start time
	120	120 th Avenue: schedule adjustment to improve on-time performance
	Flatiron Flyer	Boulder/ Denver: running time adjustments
	LD	Longmont /Denver: running time adjustments
	N Line	Minor schedule adjustments

Appendix B: Route Analysis Tables

Major Service Reductions or Eliminations

Route 0 South Broadway				
Jan 2020 - Mar 2021 Service Change: -28.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	40,919	12,906	43,407	10,419
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	97.9%	98.8%	98.2%	97.9%
% District Impacted	2.10%	1.21%	1.75%	2.09%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	2.31%	1.21%	1.93%	2.09%

Route 0L South Broadway Limited				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	27,557	9,035	29,092	7,499
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.6%	99.2%	98.8%	98.5%
% District Impacted	1.41%	0.84%	1.18%	1.50%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.55%	0.84%	1.29%	1.50%

Route 1 1st Avenue				
Jan 2020 - Mar 2021 Service Change: -41.27%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	30,385	23,308	40,259	13,434
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.4%	97.8%	98.4%	97.3%
% District Impacted	1.56%	2.18%	1.63%	2.70%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.71%	2.18%	1.79%	2.70%

Route 1W 1st Avenue				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,130	11,122	9,140	6,111
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.0%	99.6%	98.8%
% District Impacted	0.21%	1.04%	0.37%	1.23%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.23%	1.04%	0.41%	1.23%

Route 3L East Alameda Limited				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	25,506	20,797	35,831	10,472
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.7%	98.1%	98.6%	97.9%
% District Impacted	1.31%	1.94%	1.45%	2.10%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.44%	1.94%	1.59%	2.10%

Route 8 North Broadway / Huron				
Jan 2020 - Mar 2021 Service Change: -36.80%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	21,212	19,537	30,366	10,383
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	98.2%	98.8%	97.9%
% District Impacted	1.09%	1.83%	1.23%	2.08%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.20%	1.83%	1.35%	2.08%

Route 9 West 10th Avenue				
Jan 2020 - Mar 2021 Service Change: -47.57%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	16,976	15,522	20,599	11,898
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.1%	98.5%	99.2%	97.6%
% District Impacted	0.87%	1.45%	0.83%	2.39%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.96%	1.45%	0.92%	2.39%

Route 10 East 12th Avenue				
Jan 2020 - Mar 2021 Service Change: -40.78%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	43,553	25,492	53,098	15,947
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	97.8%	97.6%	97.9%	96.8%
% District Impacted	2.23%	2.38%	2.14%	3.20%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	2.46%	2.38%	2.36%	3.20%

Route 15 East Colfax Avenue				
Jan 2020 - Mar 2021 Service Change: -27.93%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	35,091	33,586	48,753	19,924
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.2%	96.9%	98.0%	96.0%
% District Impacted	1.80%	3.14%	1.97%	4.00%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.98%	3.14%	2.17%	4.00%

Route 16L West Colfax Limited				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	17,725	9,624	19,758	7,592
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.1%	99.1%	99.2%	98.5%
% District Impacted	0.91%	0.90%	0.80%	1.52%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.00%	0.90%	0.88%	1.52%

Route 19 North Pecos				
Jan 2020 - Mar 2021 Service Change: -37.39%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	21,474	21,494	31,188	11,779
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	98.0%	98.7%	97.6%
% District Impacted	1.10%	2.01%	1.26%	2.36%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.21%	2.01%	1.39%	2.36%

Route 20 20th Avenue				
Jan 2020 - Mar 2021 Service Change: -35.32%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	40,660	26,629	52,005	15,284
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	97.9%	97.5%	97.9%	96.9%
% District Impacted	2.09%	2.49%	2.10%	3.07%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	2.29%	2.49%	2.31%	3.07%

Route 24 University Blvd				
Jan 2020 - Mar 2021 Service Change: -46.62%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	32,920	11,999	37,307	7,612
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.3%	98.9%	98.5%	98.5%
% District Impacted	1.69%	1.12%	1.51%	1.53%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.86%	1.12%	1.66%	1.53%

Route 27 East Yale Av				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,762	5,290	14,966	2,086
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.5%	99.4%	99.6%
% District Impacted	0.60%	0.49%	0.60%	0.42%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.66%	0.49%	0.67%	0.42%

Route 28 28th Avenue				
Jan 2020 - Mar 2021 Service Change: -33.79%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	39,242	19,574	47,714	11,102
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.0%	98.2%	98.1%	97.8%
% District Impacted	2.01%	1.83%	1.93%	2.23%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	2.21%	1.83%	2.12%	2.23%

Route 30 South Federal Blvd				
Jan 2020 - Mar 2021 Service Change: -74.06%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,045	25,182	23,672	12,555
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	97.6%	99.0%	97.5%
% District Impacted	0.57%	2.35%	0.96%	2.52%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.62%	2.35%	1.05%	2.52%

Route 30L South Federal Limited				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	17,737	24,360	29,308	12,789
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.1%	97.7%	98.8%	97.4%
% District Impacted	0.91%	2.28%	1.18%	2.57%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.00%	2.28%	1.30%	2.57%

Route 32 West 32nd Avenue / City Park				
Jan 2020 - Mar 2021 Service Change: -39.10%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	31,192	9,687	34,344	6,536
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.4%	99.1%	98.6%	98.7%
% District Impacted	1.60%	0.91%	1.39%	1.31%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.76%	0.91%	1.53%	1.31%

Route 36L Fort Logan Limited				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	16,897	21,690	26,331	12,255
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.1%	98.0%	98.9%	97.5%
% District Impacted	0.87%	2.03%	1.06%	2.46%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.95%	2.03%	1.17%	2.46%

Route 37 Smith Road Industrial				
Jan 2020 - Mar 2021 Service Change: -33.33%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	3,868	5,025	7,024	1,869
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.5%	99.7%	99.6%
% District Impacted	0.20%	0.47%	0.28%	0.37%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.22%	0.47%	0.31%	0.37%

Route 39L North Colorado Limited				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	16,643	7,976	21,717	2,902
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.1%	99.3%	99.1%	99.4%
% District Impacted	0.85%	0.75%	0.88%	0.58%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.94%	0.75%	0.96%	0.58%

Route 44 44th Avenue				
Jan 2020 - Mar 2021 Service Change: -36.57%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	26,909	17,524	34,657	9,776
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.6%	98.4%	98.6%	98.0%
% District Impacted	1.38%	1.64%	1.40%	1.96%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.52%	1.64%	1.54%	1.96%

Route 51 Sheridan Blvd				
Jan 2020 - Mar 2021 Service Change: -37.18%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	28,202	27,491	41,866	13,827
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.6%	97.4%	98.3%	97.2%
% District Impacted	1.45%	2.57%	1.69%	2.77%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.59%	2.57%	1.86%	2.77%

Route 53 North Sheridan				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,414	2,349	8,908	854
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.8%	99.6%	99.8%
% District Impacted	0.38%	0.22%	0.36%	0.17%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.42%	0.22%	0.40%	0.17%

Route 55 Olde Town / Arvada Ridge				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,429	1,485	4,780	1,134
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.9%	99.8%	99.8%
% District Impacted	0.23%	0.14%	0.19%	0.23%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.25%	0.14%	0.21%	0.23%

Route 59 West Bowles				
Jan 2020 - Mar 2021 Service Change: -35.73%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	16,842	4,370	19,085	2,127
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.1%	99.6%	99.2%	99.6%
% District Impacted	0.86%	0.41%	0.77%	0.43%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.95%	0.41%	0.85%	0.43%

Route 66 Arapahoe Road				
Jan 2020 - Mar 2021 Service Change: -43.45%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	22,894	8,681	27,012	4,563
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.8%	99.2%	98.9%	99.1%
% District Impacted	1.17%	0.81%	1.09%	0.92%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.29%	0.81%	1.20%	0.92%

Route 67 Ridge Road				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	12,248	2,252	12,481	2,019
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.8%	99.5%	99.6%
% District Impacted	0.63%	0.21%	0.50%	0.41%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.69%	0.21%	0.55%	0.41%

Route 72 72nd Avenue				
Jan 2020 - Mar 2021 Service Change: -57.58%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	20,353	12,916	26,795	6,475
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.0%	98.8%	98.9%	98.7%
% District Impacted	1.04%	1.21%	1.08%	1.30%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.15%	1.21%	1.19%	1.30%

Route 76 Wadsworth Blvd				
Jan 2020 - Mar 2021 Service Change: -38.59%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	31,895	14,233	38,228	7,900
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.4%	98.7%	98.5%	98.4%
% District Impacted	1.64%	1.33%	1.54%	1.59%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.80%	1.33%	1.70%	1.59%

Route 77 Ken Caryl Avenue				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	8,807	1,349	9,362	794
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.5%	99.9%	99.6%	99.8%
% District Impacted	0.45%	0.13%	0.38%	0.16%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.50%	0.13%	0.42%	0.16%

Route 80 80th Avenue				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	9,389	11,230	15,671	4,949
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.5%	98.9%	99.4%	99.0%
% District Impacted	0.48%	1.05%	0.63%	0.99%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.53%	1.05%	0.70%	0.99%

Route 99 South Kipling Street				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	14,862	4,647	17,288	2,221
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.2%	99.6%	99.3%	99.6%
% District Impacted	0.76%	0.43%	0.70%	0.45%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.84%	0.43%	0.77%	0.45%

Route 100 Kipling Street				
Jan 2020 - Mar 2021 Service Change: -49.17%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	20,932	6,499	23,590	3,840
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	99.4%	99.0%	99.2%
% District Impacted	1.07%	0.61%	0.95%	0.77%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.18%	0.61%	1.05%	0.77%

Route 104 West 104th Avenue				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	9,273	4,473	11,968	1,778
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.5%	99.6%	99.5%	99.6%
% District Impacted	0.48%	0.42%	0.48%	0.36%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.52%	0.42%	0.53%	0.36%

Route 104X Commerce City / Denver Express				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,884	1,903	6,003	784
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.7%	99.8%	99.8%	99.8%
% District Impacted	0.25%	0.18%	0.24%	0.16%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.28%	0.18%	0.27%	0.16%

Route 112 West 112th Avenue				
Jan 2020 - Mar 2021 Service Change: -38.74%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,555	3,062	9,305	1,312
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.7%	99.6%	99.7%
% District Impacted	0.39%	0.29%	0.38%	0.26%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.43%	0.29%	0.41%	0.26%

Route 116X South Simms Express				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	16,171	4,029	17,356	2,845
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.2%	99.6%	99.3%	99.4%
% District Impacted	0.83%	0.38%	0.70%	0.57%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.91%	0.38%	0.77%	0.57%

Route 120 120th Avenue / Brighton				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	21,379	13,397	28,701	6,076
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	98.7%	98.8%	98.8%
% District Impacted	1.10%	1.25%	1.16%	1.22%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.21%	1.25%	1.28%	1.22%

Route 122X Wagon Road / Civic Center Express				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,599	3,884	8,415	3,069
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.6%	99.7%	99.4%
% District Impacted	0.39%	0.36%	0.34%	0.62%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.43%	0.36%	0.37%	0.62%

Route 125 Youngfield / Ward				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	15,423	3,770	17,046	2,148
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.2%	99.6%	99.3%	99.6%
% District Impacted	0.79%	0.35%	0.69%	0.43%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.87%	0.35%	0.76%	0.43%

Route 128 Broomfield / Wagon Road				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	12,860	5,482	16,289	2,053
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.3%	99.5%	99.3%	99.6%
% District Impacted	0.66%	0.51%	0.66%	0.41%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.73%	0.51%	0.72%	0.41%

Route 131 East Iliff / Seven Hills				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	10,824	11,001	18,260	3,565
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.0%	99.3%	99.3%
% District Impacted	0.56%	1.03%	0.74%	0.72%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.61%	1.03%	0.81%	0.72%

Route 135 Smoky Hill Road				
Jan 2020 - Mar 2021 Service Change: -35.30%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	15,615	7,453	21,146	1,922
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.2%	99.3%	99.1%	99.6%
% District Impacted	0.80%	0.70%	0.85%	0.39%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.88%	0.70%	0.94%	0.39%

Route 139 Quincy Avenue				
Jan 2020 - Mar 2021 Service Change: -40.02%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	16,770	10,117	23,841	3,046
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.1%	99.1%	99.0%	99.4%
% District Impacted	0.86%	0.95%	0.96%	0.61%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.95%	0.95%	1.06%	0.61%

Route 157 CCA / Buckley				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	1,402	3,519	3,351	1,570
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.9%	99.7%	99.9%	99.7%
% District Impacted	0.07%	0.33%	0.14%	0.32%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.08%	0.33%	0.15%	0.32%

Route 169 Buckley Road				
Jan 2020 - Mar 2021 Service Change: -33.72%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	15,350	14,657	25,418	4,589
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.2%	98.6%	99.0%	99.1%
% District Impacted	0.79%	1.37%	1.03%	0.92%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.87%	1.37%	1.13%	0.92%

Route 169L Buckley / Tower DIA Limited				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	13,318	16,342	24,257	5,403
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.3%	98.5%	99.0%	98.9%
% District Impacted	0.68%	1.53%	0.98%	1.08%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.75%	1.53%	1.08%	1.08%

Route 204 Table Mesa / Moorhead / North 19th				
Jan 2020 - Mar 2021 Service Change: -55.51%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	25,488	6,687	22,099	10,075
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.7%	99.4%	99.1%	98.0%
% District Impacted	1.31%	0.63%	0.89%	2.02%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.44%	0.63%	0.98%	2.02%

Route 205T 28th St / Gunbarrel / Heatherwood				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	17,478	3,930	14,681	6,727
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.1%	99.6%	99.4%	98.7%
% District Impacted	0.90%	0.37%	0.59%	1.35%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.99%	0.37%	0.65%	1.35%

Route 206 Boulder Junction/ Fairview H. S.				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	1,730	840	1,917	653
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.9%	99.9%	99.9%	99.9%
% District Impacted	0.09%	0.08%	0.08%	0.13%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.10%	0.08%	0.09%	0.13%

Route 206F Boulder Junction/ Fairview H. S.				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,268	3,062	11,866	2,464
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.7%	99.5%	99.5%
% District Impacted	0.58%	0.29%	0.48%	0.49%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.64%	0.29%	0.53%	0.49%

Route 206S Boulder Junction/ Fairview H. S.				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	2,504	551	2,630	425
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.9%	99.9%	99.9%	99.9%
% District Impacted	0.13%	0.05%	0.11%	0.09%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.14%	0.05%	0.12%	0.09%

Route 208F Iris / Valmont				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	9,496	2,352	9,163	2,685
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.5%	99.8%	99.6%	99.5%
% District Impacted	0.49%	0.22%	0.37%	0.54%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.54%	0.22%	0.41%	0.54%

Route 209 CU / Mohawk Dr				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,458	3,579	9,887	5,150
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.7%	99.6%	99.0%
% District Impacted	0.59%	0.33%	0.40%	1.03%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.65%	0.33%	0.44%	1.03%

Route 225D Boulder / Lafayette via Base				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	20,977	5,555	18,349	8,184
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	99.5%	99.3%	98.4%
% District Impacted	1.08%	0.52%	0.74%	1.64%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.18%	0.52%	0.82%	1.64%

Route 225T Boulder / Lafayette via Base				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	21,190	5,620	18,563	8,247
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	99.5%	99.3%	98.3%
% District Impacted	1.09%	0.53%	0.75%	1.65%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.20%	0.53%	0.82%	1.65%

Route 228 Louisville / Broomfield				
Jan 2020 - Mar 2021 Service Change: -40.87%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,988	3,339	13,699	1,628
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.7%	99.4%	99.7%
% District Impacted	0.61%	0.31%	0.55%	0.33%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.68%	0.31%	0.61%	0.33%

Route 236 Boulder Junction / US36 & Table Mesa				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	5,414	1,482	3,863	3,033
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.7%	99.9%	99.8%	99.4%
% District Impacted	0.28%	0.14%	0.16%	0.61%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.31%	0.14%	0.17%	0.61%

Route 324 Main Street				
Jan 2020 - Mar 2021 Service Change: -54.68%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,728	6,726	14,736	3,718
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.4%	99.4%	99.3%
% District Impacted	0.60%	0.63%	0.60%	0.75%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.66%	0.63%	0.65%	0.75%

Route 401 Highlands Ranch / Mineral				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	12,058	2,106	13,175	989
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.8%	99.5%	99.8%
% District Impacted	0.62%	0.20%	0.53%	0.20%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.68%	0.20%	0.59%	0.20%

Route 403 Wildcat Crosstown				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	20,513	5,403	24,346	1,571
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	99.5%	99.0%	99.7%
% District Impacted	1.05%	0.51%	0.98%	0.32%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.16%	0.51%	1.08%	0.32%

Route 483 Parker Road - Lincoln Ave				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	14,317	5,469	17,821	1,965
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.3%	99.5%	99.3%	99.6%
% District Impacted	0.73%	0.51%	0.72%	0.39%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.81%	0.51%	0.79%	0.39%

Route 402L Highlands Ranch Parkway				
Jan 2020 - Mar 2021 Service Change: -31.88%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	22,032	5,120	25,598	1,554
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	99.5%	99.0%	99.7%
% District Impacted	1.13%	0.48%	1.03%	0.31%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.24%	0.48%	1.14%	0.31%

Route 72W 72nd Avenue				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	20,888	13,832	27,786	6,934
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	98.7%	98.9%	98.6%
% District Impacted	1.07%	1.29%	1.12%	1.39%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.18%	1.29%	1.23%	1.39%

Route 80L 80th Avenue				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,787	4,221	13,482	2,527
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.6%	99.5%	99.5%
% District Impacted	0.60%	0.39%	0.54%	0.51%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.66%	0.39%	0.60%	0.51%

Route 83D Cherry Creek / Parker Rd Limited				
Jan 2020 - Mar 2021 Service Change: -45.51%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	27,425	14,931	33,750	8,606
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.6%	98.6%	98.6%	98.3%
% District Impacted	1.41%	1.40%	1.36%	1.73%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.55%	1.40%	1.50%	1.73%

Route 83L Cherry Creek / Parker Rd Limited				
Jan 2020 - Mar 2021 Service Change: -14.12%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	27,412	15,977	34,686	8,703
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.6%	98.5%	98.6%	98.3%
% District Impacted	1.41%	1.49%	1.40%	1.75%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.55%	1.49%	1.54%	1.75%

Route 99L Federal Center / South Kipling Ltd				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	23,739	6,579	26,068	4,250
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.8%	99.4%	98.9%	99.1%
% District Impacted	1.22%	0.62%	1.05%	0.85%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.34%	0.62%	1.16%	0.85%

Route AA Wagon Road / Denver Airport				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	5,045	4,527	7,889	1,683
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.7%	99.6%	99.7%	99.7%
% District Impacted	0.26%	0.42%	0.32%	0.34%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.28%	0.42%	0.35%	0.34%

Route AB2 Boulder / Denver Airport				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	5,699	1,540	4,403	2,836
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.7%	99.9%	99.8%	99.4%
% District Impacted	0.29%	0.14%	0.18%	0.57%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.32%	0.14%	0.20%	0.57%

Route BOLT Boulder / Longmont				
Jan 2020 - Mar 2021 Service Change: -43.94%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	22,549	9,051	23,168	8,432
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.8%	99.2%	99.1%	98.3%
% District Impacted	1.16%	0.85%	0.94%	1.69%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.27%	0.85%	1.03%	1.69%

Route BOUND 30th Street				
Jan 2020 - Mar 2021 Service Change: -39.59%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,183	3,419	9,036	5,566
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.7%	99.6%	98.9%
% District Impacted	0.57%	0.32%	0.36%	1.12%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.63%	0.32%	0.40%	1.12%

Route CS Pine Junction / Conifer / Denver				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	345	93	390	49
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	100.0%	100.0%	100.0%	100.0%
% District Impacted	0.02%	0.01%	0.02%	0.01%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.02%	0.01%	0.02%	0.01%

Route CV Pine Junction / Conifer / Denver				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	6,714	2,265	6,927	2,053
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.7%	99.8%	99.7%	99.6%
% District Impacted	0.34%	0.21%	0.28%	0.41%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.38%	0.21%	0.31%	0.41%

Route DASH Boulder / Lafayette via Louisville				
Jan 2020 - Mar 2021 Service Change: -40.34%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	23,355	5,043	20,819	7,579
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.8%	99.5%	99.2%	98.5%
% District Impacted	1.20%	0.47%	0.84%	1.52%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.32%	0.47%	0.93%	1.52%

Route ES Evergreen / Denver				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	1,689	300	1,807	182
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.9%	100.0%	99.9%	100.0%
% District Impacted	0.09%	0.03%	0.07%	0.04%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.10%	0.03%	0.08%	0.04%

Route EV Evergreen / Denver				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,736	2,332	7,942	2,125
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.8%	99.7%	99.6%
% District Impacted	0.40%	0.22%	0.32%	0.43%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.44%	0.22%	0.35%	0.43%

Route EX Evergreen / Denver				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,427	2,307	7,628	2,105
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.8%	99.7%	99.6%
% District Impacted	0.38%	0.22%	0.31%	0.42%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.42%	0.22%	0.34%	0.42%

Route FF2 Flatiron Flyer				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	13,481	3,482	12,962	4,000
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.3%	99.7%	99.5%	99.2%
% District Impacted	0.69%	0.33%	0.52%	0.80%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.76%	0.33%	0.58%	0.80%

Route FF3 Flatiron Flyer				
Jan 2020 - Mar 2021 Service Change: -96.90%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	6,033	1,837	6,923	946
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.7%	99.8%	99.7%	99.8%
% District Impacted	0.31%	0.17%	0.28%	0.19%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.34%	0.17%	0.31%	0.19%

Route FF4 Flatiron Flyer				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	14,270	4,941	13,250	5,961
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.3%	99.5%	99.5%	98.8%
% District Impacted	0.73%	0.46%	0.54%	1.20%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.81%	0.46%	0.59%	1.20%

Route FF5 Flatiron Flyer				
Jan 2020 - Mar 2021 Service Change: -66.67%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	10,476	5,290	10,940	4,827
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.5%	99.5%	99.6%	99.0%
% District Impacted	0.54%	0.49%	0.44%	0.97%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.59%	0.49%	0.49%	0.97%

Route FF6 Flatiron Flyer				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,910	3,707	11,729	3,887
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.7%	99.5%	99.2%
% District Impacted	0.61%	0.35%	0.47%	0.78%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.67%	0.35%	0.52%	0.78%

Route FF7 Flatiron Flyer				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,120	3,008	7,436	2,692
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.7%	99.7%	99.5%
% District Impacted	0.37%	0.28%	0.30%	0.54%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.40%	0.28%	0.33%	0.54%

Route GS Golden / Boulder				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	21,836	4,583	18,829	7,590
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	99.6%	99.2%	98.5%
% District Impacted	1.12%	0.43%	0.76%	1.52%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.23%	0.43%	0.84%	1.52%

Route J Longmont / East Boulder / CU				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	22,409	9,391	24,133	7,667
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.9%	99.1%	99.0%	98.5%
% District Impacted	1.15%	0.88%	0.97%	1.54%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.26%	0.88%	1.07%	1.54%

Route JUMP Boulder / Lafayette via Arapahoe				
Jan 2020 - Mar 2021 Service Change: -35.81%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	14,343	5,519	13,864	5,998
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.3%	99.5%	99.4%	98.8%
% District Impacted	0.74%	0.52%	0.56%	1.20%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.81%	0.52%	0.62%	1.20%

Route LD1 Longmont / Denver				
Jan 2020 - Mar 2021 Service Change: -81.82%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	23,520	9,693	27,180	6,034
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.8%	99.1%	98.9%	98.8%
% District Impacted	1.21%	0.91%	1.10%	1.21%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.33%	0.91%	1.21%	1.21%

Route LD2 Longmont / Denver				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	20,377	8,496	23,851	5,022
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.0%	99.2%	99.0%	99.0%
% District Impacted	1.05%	0.79%	0.96%	1.01%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.15%	0.79%	1.06%	1.01%

Route LX1 Longmont I-25 Express				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	9,229	4,061	10,785	2,505
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.5%	99.6%	99.6%	99.5%
% District Impacted	0.47%	0.38%	0.44%	0.50%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.52%	0.38%	0.48%	0.50%

Route LX2 Longmont I-25 Express				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	8,647	4,277	10,384	2,540
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.6%	99.6%	99.5%
% District Impacted	0.44%	0.40%	0.42%	0.51%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.49%	0.40%	0.46%	0.51%

Route MALLRIDE Free Mall Ride				
Jan 2020 - Mar 2021 Service Change: -47.03%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	8,429	2,360	8,516	2,273
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.8%	99.7%	99.5%
% District Impacted	0.43%	0.22%	0.34%	0.46%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.48%	0.22%	0.38%	0.46%

Route METRORIDE Free Metro				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	9,507	3,121	9,727	2,902
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.5%	99.7%	99.6%	99.4%
% District Impacted	0.49%	0.29%	0.39%	0.58%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.54%	0.29%	0.43%	0.58%

Route NB Nederland / Boulder				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,303	614	2,946	1,971
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.9%	99.9%	99.6%
% District Impacted	0.22%	0.06%	0.12%	0.40%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.24%	0.06%	0.13%	0.40%

Route P Parker / Denver				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	12,786	3,595	13,721	2,660
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.3%	99.7%	99.4%	99.5%
% District Impacted	0.66%	0.34%	0.55%	0.53%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.72%	0.34%	0.61%	0.53%

Route RC Brighton / Denver				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	10,962	9,285	15,796	4,451
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.1%	99.4%	99.1%
% District Impacted	0.56%	0.87%	0.64%	0.89%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.62%	0.87%	0.70%	0.89%

Route SKIP Broadway				
Jan 2020 - Mar 2021 Service Change: -27.29%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	22,488	4,572	19,956	7,104
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	98.8%	99.6%	99.2%	98.6%
% District Impacted	1.15%	0.43%	0.81%	1.43%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.27%	0.43%	0.89%	1.43%

Route Y Lyons / Boulder				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	7,886	1,743	7,653	1,976
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.8%	99.7%	99.6%
% District Impacted	0.40%	0.16%	0.31%	0.40%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.44%	0.16%	0.34%	0.40%

C Line - Union Station to Littleton-Mineral Station				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	6,898	2,518	7,575	1,841
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.8%	99.7%	99.6%
% District Impacted	0.35%	0.24%	0.31%	0.37%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.39%	0.24%	0.34%	0.37%

G Line - Union Station to Wheat Ridge Ward Station				
Jan 2020 - Mar 2021 Service Change: -37.01%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,678	2,238	5,533	1,384
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.8%	99.8%	99.7%
% District Impacted	0.24%	0.21%	0.22%	0.28%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.26%	0.21%	0.25%	0.28%

F Line - 18th & California Station to RidgeGate Parkway Station				
Jan 2020 - Mar 2021 Service Change: -100.00%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	12,393	4,940	13,774	3,559
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.4%	99.5%	99.4%	99.3%
% District Impacted	0.64%	0.46%	0.56%	0.71%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.70%	0.46%	0.61%	0.71%

R Line - Lincoln Station to Peoria Station				
Jan 2020 - Mar 2021 Service Change: -44.03%				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	5,949	6,863	9,591	3,221
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.7%	99.4%	99.6%	99.4%
% District Impacted	0.31%	0.64%	0.39%	0.65%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.34%	0.64%	0.43%	0.65%

Major Service Increases

Route 49 Denver/ Commerce City				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	3,505	9,753	8,917	4,341
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.1%	99.6%	99.1%
% District Impacted	0.18%	0.91%	0.36%	0.87%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.20%	0.91%	0.40%	0.87%

Route 88L Thornton / Commerce City Lim				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	2,553	5,894	5,439	3,009
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.9%	99.4%	99.8%	99.4%
% District Impacted	0.13%	0.55%	0.22%	0.60%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.14%	0.55%	0.24%	0.60%

Route 104L Wagon Road / Denver Airport Limited				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,712	4,225	7,395	1,542
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.6%	99.7%	99.7%
% District Impacted	0.24%	0.40%	0.30%	0.31%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.27%	0.40%	0.33%	0.31%

Route 120E 120th Avenue				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	8,635	3,790	9,986	2,438
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.6%	99.6%	99.6%	99.5%
% District Impacted	0.44%	0.35%	0.40%	0.49%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.49%	0.35%	0.44%	0.49%

Route 120L 120th Avenue Limited				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	9,015	5,740	12,486	2,268
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.5%	99.5%	99.5%	99.5%
% District Impacted	0.46%	0.54%	0.50%	0.46%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.51%	0.54%	0.55%	0.46%

Route 520 Brighton				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	5,304	5,098	8,382	2,020
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.7%	99.5%	99.7%	99.6%
% District Impacted	0.27%	0.48%	0.34%	0.41%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.30%	0.48%	0.37%	0.41%

Route NB1 Nederland / Boulder				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,301	614	2,945	1,971
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.9%	99.9%	99.6%
% District Impacted	0.22%	0.06%	0.12%	0.40%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.24%	0.06%	0.13%	0.40%

Route NB2 Nederland / Boulder				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,224	596	2,880	1,940
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.9%	99.9%	99.6%
% District Impacted	0.22%	0.06%	0.12%	0.39%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.24%	0.06%	0.13%	0.39%

N Line - Union Station to Eastlake & 124th Station				
New Service/Restructure				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	4,560	2,893	6,308	1,145
District	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% of District Not Impacted	99.8%	99.7%	99.7%	99.8%
% District Impacted	0.23%	0.27%	0.25%	0.23%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.26%	0.27%	0.28%	0.23%

Appendix C: Route Service Area Comparative Equity Population Analysis by Service Change Category

An additional analysis was performed on demographics within subsets of routes within the RTD network. This analysis extends beyond RTD's Title VI Program requirements and represents a more granular examination of potential impacts to equity and non-equity groups. This analysis aims to provide greater detail on the overall impacted populations within equity groupings of routes by the related service change impacts. Results from this analysis may be informative when considering future modifications to service for equity populations.

The population within one-quarter mile of route/line stops/stations was totaled for different tiers of routes. Total population, minority population, non-minority population, low-income population, and higher-income populations were totaled within each subset of routes. Each equity population's comprising share of the District equity population was determined for comparison purposes, similar to the route level comparative difference analysis. Routes were categorized by those with major service reductions/eliminations and those with major service additions. Within those two categories, routes were further divided into low-income/higher-income and minority/non-minority routes based on the service area demographics of those routes within the January 2020 network. As with previous analyses presented in this report, demographics are sourced from the 2018 ACS 5-Year Estimates.

Equity and non-equity populations were compared within each subset of routes. For instance, minority and non-minority populations were compared within low-income routes that had major service reductions/eliminations. Similarly, low-income and higher-income populations were compared within minority routes that received major service increases.

The results from the analysis indicate potential adverse effects to subsets of population by route service change category. Low-income routes that received major service reductions/eliminations appear to potentially affect minority populations 14% greater than non-minority populations. When looking at minority routes that had service reductions/eliminations, minority populations were potentially affected up to 53% more than non-minority populations.

Low-income populations living with the service area of low-income routes that received a major service reduction/elimination appear to be potentially affected 40% more than higher-income populations within those route service areas. For low-income populations within minority route service areas that received a service reduction/elimination, their potential impact was 42% greater than higher-income populations.

For routes with service increases, minority and low-income populations appear to be potentially benefiting more than non-equity groups. Service increases for low-income and minority routes appear to potentially benefit minority populations more than non-minority groups; minority route increases potentially benefit both equity groups as well. Interestingly, lower-income populations within higher-income routes with service increases benefited nearly 750% more than higher-income populations.

Table C-1. Demographic Summary of Route Service Area Minority Populations within Service Change Categories

Route Type	Total Pop (Minority)	Minority Population	Min % of District Pop.	Non-Min Population	Non-Min % of District Pop.	DI Thresh	Delta
All Routes In the January 2020 network							
<i>Population within...</i>							
...all routes	1,727,440	708,030	66.2%	1,019,410	52.3%	57.5%	--
...low-income routes	1,427,053	631,045	59.0%	796,008	40.8%	44.9%	--
...higher-income routes	545,071	157,671	14.7%	387,400	19.9%	21.9%	--
...Minority routes	1,162,360	575,215	53.8%	587,145	30.1%	33.1%	--
...non-Minority routes	953,901	268,483	25.1%	685,418	35.2%	38.7%	--
Routes with Major Service Reductions and Eliminations - 103 Routes in the Jan 2020 Network							
<i>Population within...</i>							
...all routes	1,236,852	453,335	42.4%	783,517	40.2%	44.2%	-4.1%
Pop. within low-income routes	909,768	370,916	34.7%	538,852	27.6%	30.4%	14.1%
Pop. within higher-income routes	474,543	130,188	12.2%	344,355	17.7%	19.4%	-37.3%
Pop. within Minority routes	637,792	305,711	28.6%	332,081	17.0%	18.7%	52.6%
Pop. within non-Minority routes	764,038	202,929	19.0%	561,109	28.8%	31.7%	-40.0%
Routes with Major Service Increases - 10 routes in the Mar 2021 Network							
<i>Population within...</i>							
...all routes	99,809	46,059	4.3%	53,750	2.8%	3.0%	42.0%
Pop. within low-income routes	56,533	28,191	2.6%	28,342	1.5%	1.6%	64.9%
Pop. within higher-income routes	48,466	20,584	1.9%	27,882	1.4%	1.6%	22.4%
Pop. within Minority routes	84,154	42,364	4.0%	41,790	2.1%	2.4%	68.0%
Pop. within non-Minority routes	17,342	4,404	0.4%	12,938	0.7%	0.7%	-43.6%

Table C-1. Demographic Summary of Route Service Area Low-Income Populations within Service Change Categories

Route Type	Total Pop (Low-Income)	Low-Income Population	L-I % of District Pop	Higher-Income Population	H-I % of District Pop	DB Thresh	Delta
All Routes In the January 2020 network							
<i>Population within...</i>							
...all routes	1,696,878	354,826	71.2%	1,342,052	54.2%	59.6%	--
...low-income routes	1,399,695	326,983	65.6%	1,072,712	43.3%	47.7%	--
...higher-income routes	538,372	67,056	13.5%	471,316	19.0%	20.9%	--
...Minority routes	1,147,552	272,192	54.6%	875,360	35.4%	38.9%	--
...non-Minority routes	930,715	159,425	32.0%	771,290	31.2%	34.3%	--
Routes with Major Service Reductions and Eliminations - 103 Routes in the Jan 2020 Network							
<i>Population within...</i>							
...all routes	1,212,113	240,004	48.2%	972,109	39.3%	43.2%	11.5%
Pop. within low-income routes	881,187	208,494	41.8%	672,693	27.2%	29.9%	39.9%
Pop. within higher-income routes	469,825	56,374	11.3%	413,451	16.7%	18.4%	-38.4%
Pop. within Minority routes	630,245	150,500	30.2%	479,745	19.4%	21.3%	41.6%
Pop. within non-Minority routes	744,180	122,050	24.5%	622,130	25.1%	27.6%	-11.4%
Routes with Major Service Increases - 10 routes in the Mar 2021 Network							
<i>Population within...</i>							
...all routes	98,950	20,995	4.2%	77,955	3.1%	3.5%	21.6%
Pop. within low-income routes	55,964	14,607	2.9%	41,357	1.7%	1.8%	59.5%
Pop. within higher-income routes	116,685	76,156	15.3%	40,529	1.6%	1.8%	748.4%
Pop. within Minority routes	83,382	16,898	3.4%	66,484	2.7%	3.0%	14.8%
Pop. within non-Minority routes	17,251	4,410	0.9%	12,841	0.5%	0.6%	55.1%

**Board of Directors**

Chair – Angie Rivera-Malpiede, District C
 First Vice Chair – Lynn Guissinger, District O
 Second Vice Chair – Shelley Cook, District L
 Secretary – Vince Buzek, District J
 Treasurer – Paul Rosenthal, District E

Julien Bouquet, District G
 Bob Broom, District F
 Peggy Catlin, District N
 Erik Davidson, District I
 Bobby Dishell, District D

Shontel M. Lewis, District B
 Marjorie Sloan, District M
 Doug Tisdale, District H
 Troy Whitmore, District K
 Kate Williams, District A

BOARD OF DIRECTORS MEETING**REMOTE MEETING****April 20, 2021 at 5:30 PM****I. Call to Order**

Chair Rivera-Malpiede called the meeting to order at 5:30 p.m.

II. Pledge of Allegiance**III. Roll Call - Determination of Quorum**

Attendee Name	Title	Status	Arrived
Julien Bouquet	Director, District G	Remote	5:30 PM
Bob Broom	Director, District F	Remote	5:30 PM
Vince Buzek	Director, District J	Remote	5:30 PM
Peggy Catlin	Director, District N	Remote	5:30 PM
Shelley Cook	Director, District L	Remote	5:30 PM
Erik Davidson	Director, District I	Remote	5:30 PM
Bobby Dishell	Director, District D	Remote	5:30 PM
Lynn Guissinger	Director, District O	Remote	5:30 PM
Shontel Lewis	Director, District B	Remote	5:30 PM
Angie Rivera-Malpiede	Director, District C	Remote	5:30 PM
Paul Rosenthal	Director, District E	Remote	5:30 PM
Marjorie Sloan	Director, District M	Remote	5:30 PM
Doug Tisdale	Director, District H	Remote	5:30 PM
Troy Whitmore	Director, District K	Remote	5:30 PM
Kate Williams	Director, District A	Remote	5:30 PM

In addition to Directors and senior staff, there were 25 participants in attendance.

IV. Retiree Awards

None.

V. Public Participation

None.

VI. Committee Reports

Planning/Capital Programs & FasTracks Committee
Communications & Government Relations Committee
Civil Rights Committee
Operations & Customer Services Committee
Financial Administration & Audit Committee
GM Oversight & Performance Management

VII. General Manager Oversight and Performance Management Update

Presented by Committee Chair Buzek.

VIII. Approval of the Board Meeting/Special Board Meeting Minutes of February 23, 2021 and the Special Board Meeting of March 9, and March 23, 2021

Motion: Director Broom made the motion to approve the minutes for the Board Meeting and Special Board Meeting of February 23, 2021, the Special Board Meeting of March 9, 2021, and the Special Board Meeting of March 23, 2021.

Director Rosenthal seconded the motion.

Vote on

the Motion: The motion passed with 15 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Lewis, Lubow, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams) and 0 against.

Chair Rivera-Malpiede declared the motion **PASSED unanimously**.

IX. Chair's Report

Presented by Chair Rivera-Malpiede.

X. General Manager's Report

Presented by General Manager and CEO Debra Johnson.

XI. Unanimous Consent

Motion: Director Buzek made the motion to approve Items A through G on the unanimous consent agenda.

Director Whitmore seconded the motion.

Vote on

the Motion: The motion passed with 15 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams) and 0 against.

RESULT: **ADOPTED [UNANIMOUS]**

MOVER: Vince Buzek, Paul Rosenthal

SECONDER: Troy Whitmore, Director, District K

AYES: Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, Williams

Chair Rivera-Malpiede declared the motion **PASSED unanimously**.

A. Aurora CELO Annexation

For the Board of Directors to approve the revised boundary map of the Regional Transportation District and authorize the Board Secretary to certify the boundary map and description.

It is further recommended that the newly annexed area to RTD pursuant to the provisions of CRS 32-9-106.6 (1)(b) be included in Director District F (Director Broom).

B. Reimagine RTD Guiding Principles

For the Board of Directors to adopt guiding principles to create a framework for decision making for the Mobility Plan for the Future element of the Reimagine RTD project.

C. Approval of Contract to Purchase Validators for Account-Based Ticketing

For the Board of Directors to authorize the General Manager or her designee to enter into a contract with Masabi to purchase new bus and rail platform fare validators for the Account-Based Ticketing (ABT) system.

D. Budget Transfer for Railroad Liability Insurance Premiums

For the Board of Directors to authorize the General Manager or her designee to authorize a budget transfer of \$400,000 to fund increased commuter rail liability insurance coverage and premiums for the N-line.

E. Request for Budget Transfer Paratransit Software Replacement

For the Board of Directors to authorize the General Manager or her designee to authorize a budget transfer of up to \$4,000,000 to fund activities for the upcoming Paratransit Software Replacement contract.

F. June 2021 Proposed Service Change

For the Board of Directors to approve the June 2021 Service Changes and to authorize the General Manager or her designee to execute contract amendments as necessary for private operators whose services are impacted by these changes.

G. COVID-19 Title VI Service Equity Analysis

For the Board of Directors to adopt the Title VI Service Equity Analysis report to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964.

XII. Recommended Action

H. Approval of Triunity Hill Joint Venture Contract Extension and Value Increase

For the RTD Board of Directors to authorize the General Manager to approve a contract amendment to exercise all remaining option years of the Triunity-Hill Joint Venture agreement for Construction Management Support Consultant Services for FasTracks and Base Systems operations, extending the contract end date to July 13, 2024, and increasing the contract value by \$3,000,000 to a total not-to-exceed value of \$37,400,000.

Motion: Director Catlin made the motion to approve the Triunity Hill Joint Venture Contract Extension and Value Increase.

Director Broom seconded the motion.

Vote on the Motion: The motion passed with 13 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Guissinger, Rivera-Malpiede, Rosenthal, Sloan,

Tisdale, Whitmore, and Williams) and 2 against (Dishell and Lewis).

RESULT: ADOPTED [13 TO 2]

MOVER: Peggy Catlin, Director, District N

SECONDER: Bob Broom, Director, District F

AYES: Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Guissinger, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, Williams

NAYS: Bobby Dishell, Shontel Lewis

Chair Rivera-Malpiede declared the motion **PASSED**.

I. Funding Agreement - City of Boulder/HOP for 2021

For the Board of Directors to authorize the General Manager and CEO, or her designee, to execute all documents necessary to enter into a Funding Agreement with the City of Boulder for financial support for HOP circulator operations within the commercial areas of the City of Boulder, the University of Colorado at Boulder and adjacent business and residential areas for calendar year 2021 for an amount not to exceed \$978,092.

Motion: Director Guissinger made the motion to approve the Funding Agreement – City of Boulder/HOP.

Director Williams seconded the motion.

Vote on

the Motion: The motion passed with 13 in favor (Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, and Williams) and 1 against (Lewis).

RESULT: ADOPTED [14 TO 1]

MOVER: Lynn Guissinger, Director, District O

SECONDER: Kate Williams, Director, District A

AYES: Bouquet, Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, Williams

NAYS: Shontel Lewis

Chair Rivera-Malpiede declared the motion **PASSED**.

XIII. Executive Session

None.

XIV. Old Business

The Board held a moment of silence to honor the life of George Floyd.

XV. New Business

The Board addressed new items of business, including:

- Updates from the RTD Accountability Committee;
- Hydrogen-fueled vehicles, alternative and renewable energy strategies, and sustainability.
- Vaccinations among Directors;
- House Bill 21-1252;
- Upcoming JEDI workshops.

XVI. Adjourn

Chair Rivera-Malpiede adjourned the meeting 6:27 p.m.

The following communication assistance is available for public meetings:

- Language Interpreters
- Sign-language Interpreters
- Assisted listening devices

Please notify RTD of the communication assistance you require at least 48 business hours in advance of a RTD meeting you wish to attend by calling 303.299.2307

THE CHAIR REQUESTS THAT ALL PAGERS AND CELL PHONES BE SILENCED DURING THE BOARD OF DIRECTORS MEETING FOR THE REGIONAL TRANSPORTATION DISTRICT.

Attachment M

May 2020 Service Change Plan Equity Analysis, with Documentation of Board Approval

EQUITY ANALYSIS

March 2020

May 2020 Service Change

Equitable distribution of transit service is a core principle of the Regional Transportation District. This document details the measures taken to ensure major service changes do not result in a disparity in impacts absorbed by populations protected under Title VI of the Civil Rights Act of 1964 and Executive Order 12898 (Environmental Justice).

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Equity Analysis

MAY 2020 SERVICE CHANGE

INTRODUCTION

Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD) mission to provide mass transit service in the Denver Metro Area. An equitable mass transit system fairly distributes the benefits and adverse effects of transit service without regard for race, color, national origin, or low-income status. This principle is detailed and reinforced by Title VI of the Civil Rights Act of 1964 and Executive Order 12898 pertaining to environmental justice.

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

In 1994, President Clinton issued Executive Order 12898, which states that each federal agency "shall make achieving environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Environmental Justice. In this circular, the FTA requires RTD to evaluate, prior to implementation, any and all service changes that exceed the established major service change threshold, to determine whether those changes will have a disproportionately negative impact on minority or low-income populations.

SERVICE CHANGE PHILOSOPHY

An equity analysis is triggered by proposed changes to the services provided by RTD. These changes include the addition of new routes, the elimination of existing routes, and changes to the alignment and trip frequency within existing routes. RTD has established policies to identify the service changes needed to meet the diverse travel needs of the citizens of the District and maintain a high-performance, sustainable transit system.

RTD services are divided into various service classes depending on service type, route alignment, and frequency. Each service class has its own service standards derived from the performance of all routes within each class. RTD continually adjusts services in response to changes in ridership and operational performance of the transit system as a whole. It is also the District's responsibility to identify services that are underperforming and recommend modifications, curtailment, or cancellation of service as warranted. In keeping with Colorado Revised Statutes, RTD utilizes official service standards to establish performance metrics used to identify underperforming services on a class-of-service basis. The District used these metrics to identify a series of service changes. Equity analyses examine the impact of the proposed changes on minority populations and low-income households at or below 185 percent of the Department of Health and Human Services Poverty Guidelines.

...The general assembly further finds that the district should be organized efficiently, economically, and on a demand-responsive basis and that the district should consider least-cost alternatives in discharging its responsibilities. The general assembly further finds that the farebox recovery ratio of the district must be improved so that resources once allocated for mass transportation can be made available for other surface transportation needs.

Colorado Revised Statutes 32-9-119.7 Farebox Recovery Ratios -- Plans

ANALYSIS

The FTA requires RTD to establish policies that will guide the analysis to determine whether major service changes will have a disproportionately negative impact on minority or low-income populations. Accordingly, RTD established equity analysis policies and a service evaluation process to meet this requirement.

Equity Analysis Policies

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a Major Service Change Policy, a Disparate Impact Policy, and a Disproportionate Burden Policy. Collectively, these policies provide foundational requirements for evaluating service change proposals for equity. These policies and their applicable thresholds are listed below:

1. **Major Service Change Policy:** A major service change is defined as a 25 percent addition or reduction in the service hours of any route that would remain in effect for twelve (12) or more months. All major service changes will be subject to an equity analysis that includes an analysis of adverse effects.
 - a. Adverse Effect is defined as a geographical or temporal reduction in service that includes, but is not limited to: eliminating a route, shortening a route by eliminating segments, rerouting an existing route, and increasing headways. RTD shall consider the degree of adverse effects and analyze those effects when planning major service changes.
2. **Disparate Impact Policy:** A major service change should not adversely affect a minority population 10 percent more than non-minority populations; this level of impact is considered a disparate impact.
3. **Disproportionate Burden Policy:** A major service change should not adversely affect a low-income population 10 percent more than non-low-income populations; this level of impact is considered a

disproportionate burden. A low-income population is a group of households who are at or below 185 percent of the Department of Health and Human Services Poverty Guidelines.

If a proposed major service change results in a disparate impact or a disproportionate burden, RTD will consider modifying the proposed service change. RTD will then analyze the modification and make sure it removed the potential disparate impact or disproportionate burden. If a less discriminatory option cannot be identified and RTD can demonstrate a substantial legitimate justification for the proposed service change, the FTA may allow RTD to proceed with the proposed change.

Service Change Overview

The equity analysis in this report examined the impact to minority and low-income populations caused by the proposed major service changes summarized below. RTD is currently grappling with a severe labor shortage and the number of available bus and train operators is significantly below the number needed to operate the amount of service scheduled. RTD has responded to this staffing shortage with a service change proposal that reduces the number of operators needed to deliver reliable service.

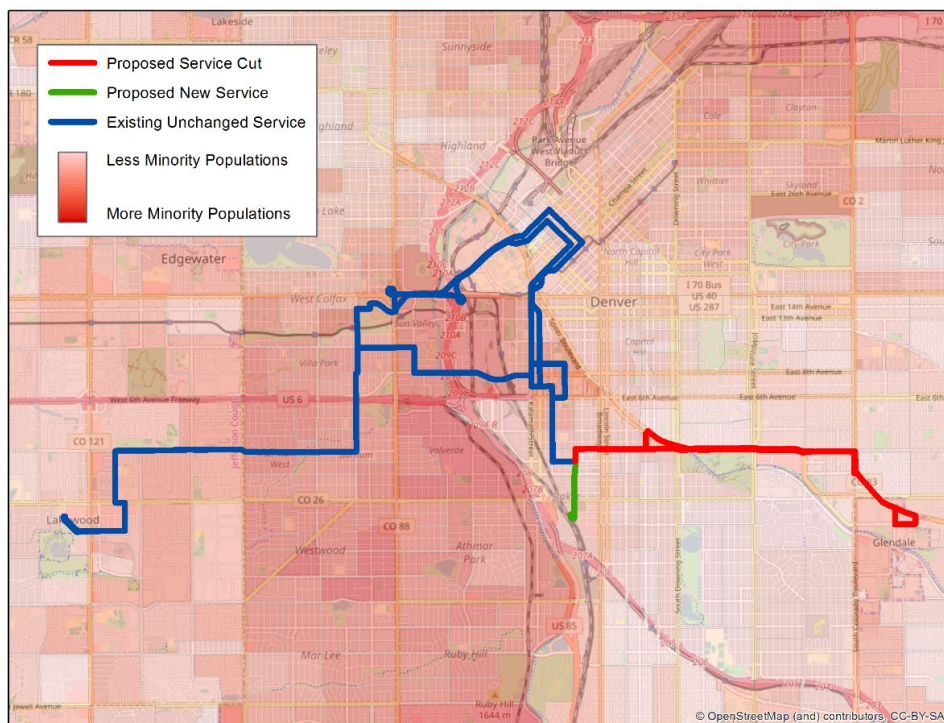
Initially, RTD had proposed more service changes than those examined in this Title VI analysis. After an extensive public outreach effort involving more than 15 public meetings around the District, many proposed service changes were removed based on community feedback. Based on feedback, RTD is no longer proposing elimination of the 16L, adding peak service back to Route 32 east of downtown Denver, adding service back to the 99L from Federal Center to Civic Center, eliminating changes to Routes 153, 157, and 483, among others.

Additionally, RTD is currently evaluating service changes based on the COVID-19 outbreak, and these changes are consistent with RTD's Pandemic Plan for reduced service previously adopted by the RTD Board.

Route 1

Route 1 – 1st Avenue; Service Standard type – CBD Local – (10% - 15.2 pass. per hr. / 25% - 22.3 pass. per hr.). Due to low ridership performance on the eastern portion of this route, it proposed that the eastern portion of this route be discontinued. Cost saving impacts are estimated to be approximately \$175,236 annualized and number of operators needed will be reduced by 1.3 per weekday. A map of the service changes can be seen in Figure 1 below.

Figure 1 – Map of Route 1 Service Changes



Route 65

Route 65 – Monaco Parkway; Service Standard Type – Suburban Local – (10%-4.7 pass. per hr. / 25%-11.4 pass. per hr.). This service currently operates on Sundays with 17.5 boardings per hour. In accordance with RTD's adopted service standards, Sunday frequency on this route will be reduced from 30 minutes to 60 minutes. The maximum load threshold in RTD's service standards indicates that loads for this route can be handled at hourly frequencies. Cost saving impacts are estimated to be approximately \$47,829 annualized and the number of operators needed will be reduced by 1.5 each Sunday.

Route 130

Route 130 – Yale/Buckley; Service Standard Type – Suburban Local – (10%-4.7 pass. per hr. / 25%-11.4 pass. per hr.). This service currently operates with 23.8 boardings per hour during peak periods. Due to low ridership performance and in accordance with RTD's adopted service standards, peak weekday frequencies are being reduced from 15 minutes to 30 minutes. RTD's service standards state that once a route falls below 25 boardings per hour, 15 minute peak frequency is reduced to 30 minutes. Cost saving impacts are estimated to be approximately \$219,045 annualized and the number of operators needed will be reduced by 1.6 each weekday.

Route 236

Route 236 – Boulder Junction/US 36 & Table Mesa; Service Standard Type – Urban Local – (10%-12.2 pass. per hr. / 25%-19.1 pass. per hr.). This service currently operates at 10.9 boardings per hour. Due to low ridership performance and in accordance with RTD's adopted service standards, this service will be eliminated. Cost saving impacts are estimated to be approximately \$164,220 annualized and the number of operators needed will be reduced by 1.3 each weekday.

R Line

R Line – Light Rail. This service currently operates at 48 boardings per hour. Due to low ridership performance, service frequency on this line will be reduced from 15 minutes to 30 minutes, except for on the Southeast Rail Extension, which requires higher frequencies as required by contract compliance with FTA. The R Line is currently the worst performing rail corridor that is operated by RTD, seeing 48 passengers per hour. This is significantly lower than the next lowest performing rail line, the B Line, which averages 85 boardings per hour. Other RTD light rail lines operate in excess of 100 boardings per hour. Cost saving impacts are estimated to be approximately \$1,579,093 annualized and the number of operators needed will be reduced by 6.6 each weekday and 1.6 each Saturday and Sunday.

Equity Analysis Methodology

The basic framework for analyzing service changes for equity involved comparing affected populations. Identify the proposed changes by routes.

1. Collect and examine latest on-board survey data for statistical validity and ridership demographics at the route level.
2. If statistically valid ridership data is unavailable, obtain applicable demographic data for the study area and spatially allocate the data within a buffer around routes (0.25-mile buffer for bus, 0.50-mile buffer for rail) based on American Community Survey block group population data.
3. Examine the percentage of minority and non-minority populations and to low-income and non-low-income (ridership or residents) subject to the change in service.

Unfortunately, the on-board survey data samples for some of the routes examined in this analysis are below the threshold for statistical validity. Alternatively, we must rely on population data from the US Census and American Community Survey (ACS) to examine the distribution of adverse effects on these routes. Since we used two different data sources, we used two thresholds for determining disproportionate burden and two thresholds for determining disparate impact. We used different thresholds for the on-board survey and ACS data because each dataset surveyed a different group of people. By using different thresholds, we ensure that we are making appropriate comparisons between the data. Table 1 displays the service area demographic profiles used to measure service changes for disparate impact and disproportionate burden.

Table 1 - RTD Service Area Demographic Profile

Data Source	Percent Minority ¹	Percent Low-income ²
On-Board Survey	48%	51%
American Community Survey	35%	22%

The thresholds in Table 1 are averages of the entire on-board survey conducted in 2015 and averages of the entire District based on ACS data. For the on-board survey, staff classified anyone making less than \$40,000 per year as low-income. For the ACS data, staff used 185% of the federal poverty level. Since the federal poverty level is based on income *and* household size, it wasn't possible to use the federal poverty level for the on-board survey. For this reason, we determined incomes less than \$40,000 per year would be considered low-income for the on-board survey for the purposes of this analysis.

Route Analysis

In accordance with RTD's Title VI policy, an analysis by route was carried out to determine disparate impact or disproportionate burdens caused by these proposed changes. A summary of the results can be seen in Table 2 below.

¹ American Community Survey - 2018 5-Year Estimates

² 2013 American Community Survey (2013)

Table 2 – Summary of Title VI Analysis

Route	On-Board Survey		American Community Survey	
	Minority Population (+/- Average)	Low-Income Population (+/- Average)	Minority Population (+/- Average)	Low-Income Population (+/- Average)
Route 1	61% (+13%)	42% (-9%)	18% (-17%)	14% (-8%)
Route 65	60% (+12%)	26% (-25%)	30% (-5%)	19% (-3%)
Route 130	N/A	N/A	53% (+18%)	29% (+7%)
Route 236	N/A	N/A	24% (-11%)	40% (+18%)
R Line	N/A	N/A	47% (+12%)	26% (-4%)

Route 1

The Route 1 proposed service change calls for rerouting service to Alameda Station and discontinuing service east of Bannock Street. This route exceeded the +10% threshold for the on-board survey for minority populations, with 61% of on-board survey respondents indicating they are minorities. However, staff have determined this is not a disparate impact, as the portion of the route being cut travels through an area averaging an 18% minority population, significantly less than the district average.

Route 65

The Route 65 service change calls for reducing Sunday frequency from every 30 minutes to every 60 minutes. This route exceeded the +10% threshold for the on-board survey for minority populations, with 60% of on-board survey respondents indicating they are minorities. According to ACS data, of the census block groups within ¼ mile of Route 65, the population of minorities is only 30%, lower than the District average. As noted in the Service Change Overview above, because this route is performing below RTD's adopted service standards, there is a legitimate business justification for reducing frequency on this service.

Route 130

The Route 130 service change calls for reducing peak frequency from 15 to 30 minutes. This route exceeds the +10% threshold for the ACS data for minority populations, with 53% of people located in census block groups within a quarter-mile of the route being minority. There is no on-board survey data for this route. As noted in the Service Change Overview above, because this route is performing below RTD's adopted service standards, there is a legitimate business justification for reducing frequency on this service.

Route 236

The Route 236 service change calls for total elimination of the route. This route exceeds the +10% threshold for the ACS data for low-income populations. This route operates primarily through the CU Boulder campus which have a high student population, the likely source of the large number of low-income populations. As noted in the Service Change Overview above, because this route is performing below RTD's adopted service standards,

there is a legitimate business justification for eliminating this route. Alternate service is provided on other local Boulder bus routes.

R Line

The R Line service change calls for reducing service frequency from 15 minutes to 30 minutes. This route exceeds the +10% threshold for the ACS data for minority populations, with 47% of people located in census block groups within a half-mile of the stations being minority. There is no on-board survey information for the R Line. As noted in the Service Change Overview above, because this route is performing below RTD's adopted service standards, there is a legitimate business justification for reducing frequency on this service.

Conclusion

The primary objective for this analysis was to examine proposed service changes to ensure minority and low-income populations would not be more adversely affected than non-minority and non-low-income populations. An analysis of demographic data has shown the proposed service changes would result in a disparate impact to populations served by three routes (Routes 65, 130, and R Line) and a disproportionate burden to populations served on one route (Route 236). However, because these routes have fallen below RTD's adopted service standards and RTD is grappling with a severe labor shortage, there is legitimate business justification for reducing service on the routes. After reviewing routes similar to the ones listed above, it was determined there was no less discriminatory alternative than the changes stipulated in this analysis.



Board of Directors

Chair – Angie Rivera-Malpiede, District C
First Vice Chair – Peggy Catlin, District N
Second Vice Chair – Shelley Cook, District L
Secretary – Vince Buzek, District J
Treasurer – Lynn Guissinger, District O

Bob Broom, District F
Claudia Folska, District E
Shontel M. Lewis, District B
Judy Lubow, District I
Natalie Menten, District M

Ken Mihalik, District G
Doug Tisdale, District H
Jeff Walker, District D
Troy Whitmore, District K
Kate Williams, District A

BOARD OF DIRECTORS MEETING

March 24, 2020 at 5:30 PM

REMOTE MEETING

855-962-1128

I. Call to Order

II. Pledge of Allegiance

III. Roll Call - Determination of Quorum

IV. Retiree Awards

Katherine Arrington-Wells – Light Rail Operator – 20 years
Darrell Rickett – Bus Operator – 19 years
Jon Sieve – General Repair Mechanic – 22 years

V. Public Participation

VI. Committee Reports

Planning/Capital Programs & FasTracks Committee – Chaired by Director Lubow
Communications & Government Relations Committee – Chaired by Director Guissinger
Civil Rights Committee – Chaired by Director Lewis
Operations & Customer Services Committee – Chaired by Director Williams
Financial Administration & Audit Committee – Chaired by Director Cook
GM Oversight & Performance Management – Chaired by Director Catlin

VII. General Manager Oversight and Performance Management Update

VIII. Approval of Board Meeting Minutes of February 25, 2020

IX. Approval of Special Board Meeting Minutes of February 25, 2020

X. Chair's Report

XI. General Manager's Report

XII. Unanimous Consent

A. Remote Participation in Meetings During Emergencies

This recommended action supports the following Agency Goals:

Core Goal #2 – Strong & Ethical Leadership

Task Goal #4 – Strengthen Safety & Security

XIII. Recommended Action

B. May 2020 Recommended Service Changes

It is recommended by the Operations and Customer Services Committee that the Board of Directors approve the May 2020 Service Change package as revised and summarized in Attachment A resulting in an annualized base system cost savings of \$6,737,700 and a FasTracks cost savings of \$1,534,700, and a reduction of 43 operator shifts and, further, to authorize the General Manager or his designee to execute contract amendments as necessary for private operators whose service is impacted by these changes.

The funds that are saved through the service reductions will be placed in the Board Appropriated Reserves for future Board consideration.

This recommended action supports the following General Manager's Goals:

Core Goal #1 – Successful Delivery of Transit Services

XIV. Executive Session

XV. Old Business

A. N Line Update

XVI. New Business

XVII. Adjourn

The following communication assistance is available for public meetings:

- Language Interpreters
- Sign-language Interpreters
- Assisted listening devices

Please notify RTD of the communication assistance you require at least 48 business hours in advance of a RTD meeting you wish to attend by calling 303.299.2307

THE CHAIR REQUESTS THAT ALL PAGERS AND CELL PHONES BE SILENCED DURING THE BOARD OF DIRECTORS MEETING FOR THE REGIONAL TRANSPORTATION DISTRICT.

Attachment N

Data from 2019 Customer Satisfaction Survey



2019 Customer Satisfaction Survey

Regional Transportation District

FINAL REPORT

Final Report

May 2019

2019 Customer Satisfaction Survey

Prepared for

Regional Transportation District
1660 Blake St, Denver, CO 80202

Prepared by

BBC Research & Consulting
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SECTION I.

Introduction

The Regional Transportation District (RTD) is the regional public transit authority in the Denver and Boulder Metropolitan area and operates public transit services across eight counties, including approximately 120 bus routes, 11 rail lines, and various specialty services, such as Access-a-Ride, FlexRide, and numerous area shuttles.¹ RTD's mission is to provide safe, clean, reliable, courteous, accessible, and cost-effective service across all of those trips.

To assess the degree to which it is meeting its customers' needs, RTD regularly conducts a large-scale survey to assess satisfaction across various aspects of the services and amenities it provides. RTD last conducted a satisfaction survey in 2017, but since that time, the organization has gone through several changes, including new service lines, a new fare structure, and a new mobile ticketing application. In light of those changes, RTD commissioned BBC Research & Consulting (BBC) to conduct the 2019 Customer Satisfaction Survey across all revenue-generating services—including bus, SkyRide, light rail, commuter rail, and FlexRide services—to assess how those changes may have affected customer satisfaction since 2017.

In conducting the 2019 survey, BBC built on its experience conducting customer satisfaction surveys for RTD in 2011, 2014, and 2017. The questions that BBC and RTD included in the 2019 survey were very similar to questions that were included as part of those previous surveys, but the survey also included some new questions to address particular areas of interest, including the degree to which RTD is attracting new customers and customers' use of RTD's mobile ticketing application. BBC analyzed responses to all questions in the 2019 survey, and where possible, compared responses from the 2019 survey to responses from the 2017 survey to assess any substantial changes across time.

¹ RTD's service area includes parts or all of Adams County, Arapahoe County, Boulder County, Broomfield County, Denver County, Douglas County, Jefferson County, and Weld County.

SECTION II.

Methodology

RTD commissioned BBC to conduct the 2019 RTD Customer Satisfaction Survey in the Spring of 2019 to collect information from passengers about various topics related to the services and amenities it provides.

Survey Instrument

BBC worked closely with RTD to develop the survey instrument for the study, based primarily on instruments RTD used for past satisfaction surveys and refinements related to the district's current needs. The survey instrument included questions related to:

- **Trip characteristics**, including trip purpose; time of trip; and information about transfers;
- **Fare characteristics**, including method of payment, fare level, the use of special fare discounts, and the use of RTD's mobile ticketing application;
- **RTD use**, including RTD services used, number of RTD trips, frequency of RTD use, and changes in RTD use;
- **Satisfaction with RTD**, including satisfaction with RTD performance, reliability, comfort, value, customer care, and overall satisfaction; and
- **Demographic characteristics**, including occupation, level of education, household income, marital status, race/ethnicity, age, and gender.

The full survey instrument BBC used for the study is presented in Appendix A.

Survey Administration

BBC constructed survey packets to distribute to bus, light rail, commuter rail, FlexRide (formerly Call-n-Ride), and SkyRide customers. Each survey packet comprised the following materials:

- RTD-branded outer envelope that contained all other survey packet materials;
- Hardcopy survey instrument;
- Return envelope with pre-paid postage;
- Golf pencil; and
- Two RTD one-way Free Ride coupons.

The hardcopy survey instrument included instructions for completing the survey as well as a survey due date and how to return completed surveys to RTD. The instructions also included a link to an online version for participants who preferred to complete the survey in that manner. The survey was offered in English and Spanish. Approximately 94 percent of participants completed the survey in hardcopy format.

BBC worked closely with RTD to distribute survey packets to customers throughout March 2019. RTD bus, SkyRide, and FlexRide operators were responsible for distributing survey packets

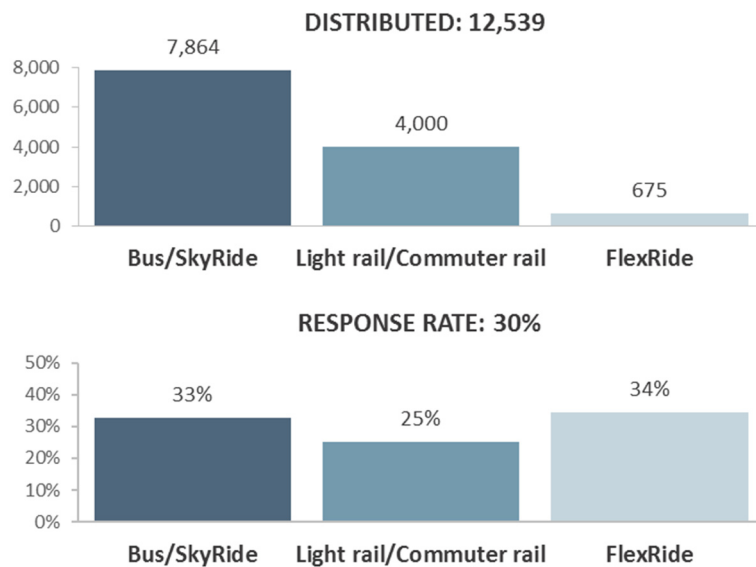
during their regular shifts according to sampling plans that RTD's Market Research team developed based on ridership volume. BBC was responsible for distributing survey packets to light rail and commuter rail customers waiting at train and transit stations according to a similar sampling plan that RTD's Market Research team developed. Figure 1 presents a breakdown of survey distribution, completes and response rate by RTD service. As shown in Figure 1, a total of 12,539 surveys were distributed with an overall response rate of 30 percent:

- 7,864 distributed to bus/SkyRide passengers with a 33 percent response rate;
- 4,000 distributed to light/commuter rail passengers with a 25 percent response rate; and
- 675 were distributed to FlexRide passengers with a 34 percent response rate.

Figure 1.
Survey distribution and
response rates by RTD service

Note:
Percentages may not sum 100% due to
rounding.

Source:
2019 RTD Customer Satisfaction Survey.



SECTION III.

Results

BBC conducted all analyses using R statistical software. As appropriate, the study team made determinations of statistical significance at the $\alpha = .05$ level using two-tailed tests. BBC weighted the survey data so that participants' responses were representative of the population of people who rode different RTD services in 2018, the last complete calendar year preceding BBC's execution of the survey. RTD provided BBC with ridership data by line and service, and we used that information to develop appropriate population weights and apply them to the survey data prior to analysis. Where possible, we compared results of participants who only used train services (*train-only* participants) and participants who used both bus and train services (*bus and train* participants) to participants who only used bus services (*bus-only* participants). In addition, where possible, we compared results from the 2019 survey to the 2017 survey.

Demographic Characteristics

The survey included various questions about participant characteristics, including level of education, household income, race/ethnicity, age, and gender. As shown in Figure 2:

- Approximately 50 percent of participants were men;
- More than 60 percent of participants were non-Hispanic whites (62%);
- More than one-half of participants were 45 years old or older (53%);
- More than one-third of participants reported residing in Denver county (37%);
- Approximately 30 percent of participants were low income individuals;²
- More than one-half of participants reported having a college degree (54%); and
- Nearly one-third of passengers reported not having a car available to them (30%).

² BBC classified participants as low income if they indicated that their total household incomes were 185 percent or less of the national poverty threshold for their household size.

Figure 2.
Demographic characteristics of passengers

Gender (n=3,720)		Household Income (n=3,354)	
Male	50%	Low Income	30%
Female	49%	Other Income	70%
Other	1%	Occupation (n=3,671)	
Race (n=3,649)		Professional/Managerial	47%
Caucasian/White	62%	Sales/Clerical/Service	17%
Hispanic/Latino	15%	Laborer/Craftsman/Foreman	10%
African American/Black	14%	Retired	6%
Asian/Pacific Islander	4%	Student (employed)	6%
Native American/Indian	2%	Student (only)	4%
Other	4%	Homemaker	1%
Age (n=3,728)		Disabled (unable to work)	4%
Under 18	1%	Unemployed (looking for work)	3%
18-24	8%	Other	2%
25-34	19%	Household Size (n=3,560)	
35-44	18%	One person	25%
45-54	19%	Two people	37%
55-64	24%	Three people	16%
65 or older	10%	Four people	13%
County of Residence (n=3,711)		Five people	6%
Denver	37%	Six people	2%
Arapahoe	18%	More than six people	2%
Jefferson	13%	Number of Cars Available by Household (n=3,673)	
Boulder	12%	No car	30%
Adams	9%	One car	28%
Douglas	5%	Two cars	27%
Broomfield	2%	Three cars	11%
Weld	1%	Four or more	5%
Other	3%	Average Number of Cars Available by Household	
Education (n=3,692)		1 car	
Less than 12 years	5%	Valid Driver's License (n=3,718)	
High school graduate	16%	Yes	74%
Some college	25%	Disability or Medical Condition that Prevents Driving (n=3,731)	
College graduate	34%	Yes	8%
Post graduate degree	20%		
Less than 12 years	5%		

Note: Percentages may not sum 100% due to rounding.

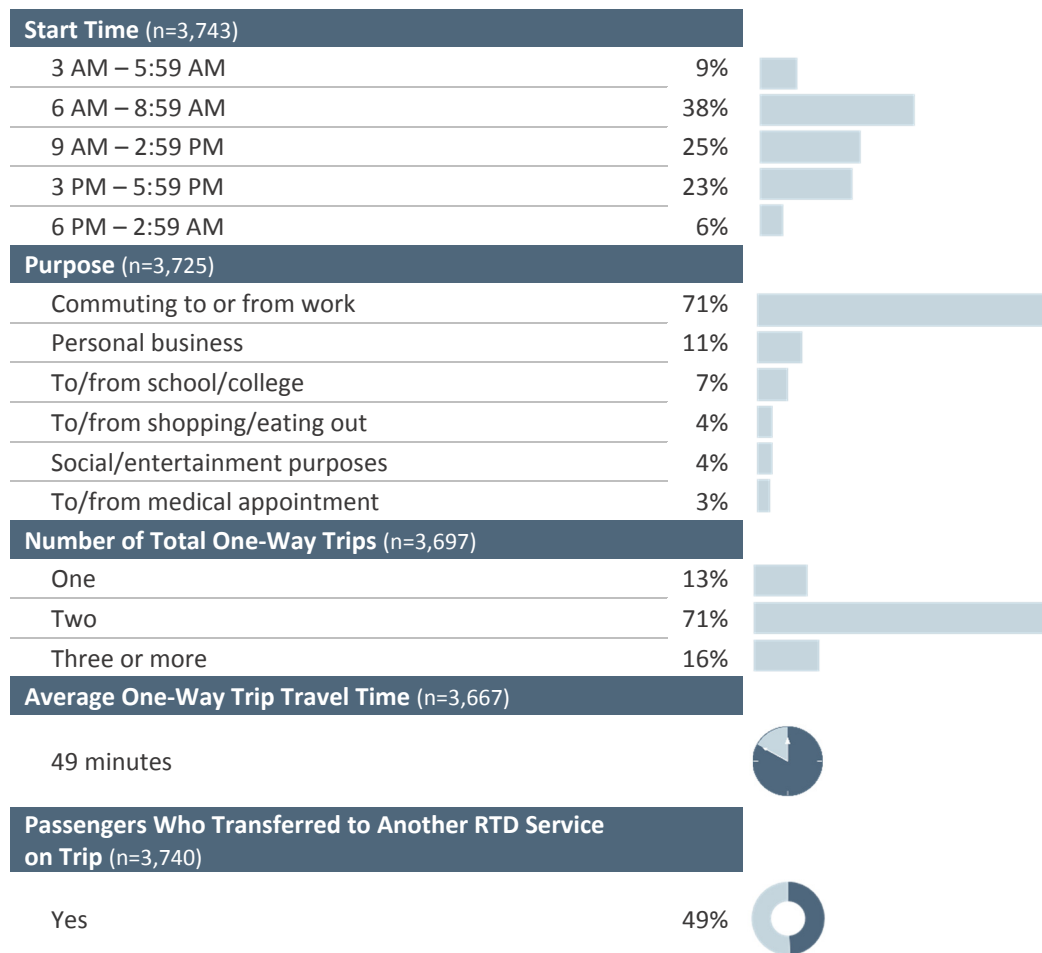
Source: 2019 RTD Customer Satisfaction Survey.

Trip Characteristics

The survey also included questions about characteristics of participants' RTD trips, including trip purpose; time of day; and mode of travel to and from RTD stops. Figure 3 presents basic characteristics of the trips on which participants received the survey. As shown in Figure 3:

- More than one-third of participants began their trip between 6 AM and 9 AM (38%);
- Nearly three-fourths of participants indicated that the primary purpose of their trip was to commute to or from work (71%);
- Nearly three-fourths of participants took two one-way trips (71%); and
- Participants reported an average one-way trip time of approximately 49 minutes.

Figure 3.
Trip characteristics



Note: Percentages may not sum 100% due to rounding.

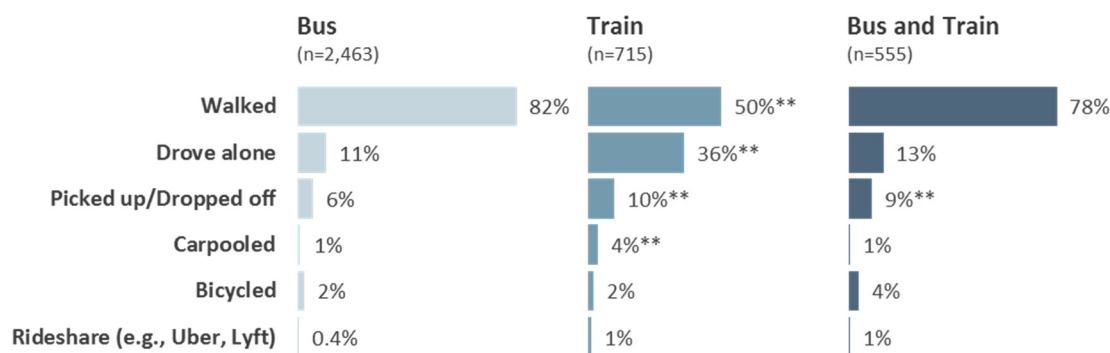
Source: 2019 RTD Customer Satisfaction Survey.

Mode of travel to originating stop. Participants were asked about all the different modes of transportation they used to get to the originating stop of the trip on which they received the survey. BBC assessed whether the mode of transportation to their originating stops differed among bus-only; train-only; and bus and train participants. The majority of passengers indicated

that they walked at least part of the way to the originating stops of their trip. However, as shown in Figure 4, there were some differences between bus-only; train-only; and bus and train passengers in how they got to their originating stops:

- Train-only participants were less likely than bus-only passengers to indicate that they walked at least part of the way to their originating stops (50% vs. 82%);
- Train-only participants were more likely than bus-only passengers to indicate that they drove alone at least part of the way to their originating stops (36% versus 11%);
- Train-only participants (10%) and bus and train participants (9%) were more likely than bus-only participants (6%) to indicate that they were picked up and dropped off at their originating stops; and
- Train-only participants were more likely than bus-only passengers to indicate that they carpooled at least part of the way to their originating stops (4% versus 1%).

Figure 4.
Mode of travel to originating stop



Notes: **Denotes statistical significance at the 95% confidence level.

Participants could indicate multiple modes of travel, so percentages may not sum to 100%.

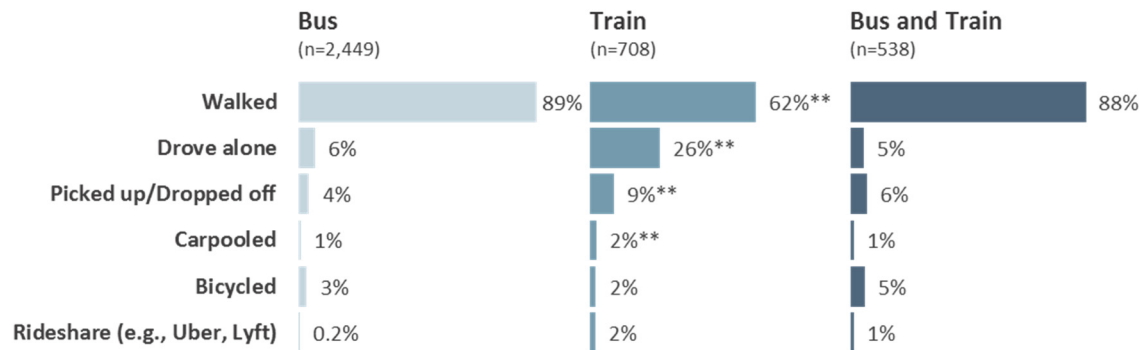
Source: 2019 RTD Customer Satisfaction Survey.

Mode of travel to final destination. Participants were also asked about all the different modes of transportation they used to get from the last stop of the trip on which they received the survey to their final destinations. Similar to their originating stops, the majority of passengers indicated that they walked at least part of the way from their final RTD stops to their final destinations. Again, BBC analyzed the differences between the modes of travel for bus-only; train-only; and bus and train participants. As shown in Figure 5, several differences emerged among passengers' mode of travel from their final stops to their final destinations:

- Train-only participants were less likely than bus-only passengers to indicate that they walked at least part of the way from their final RTD stops to their final destinations (62% vs. 89%);
- Train-only participants were more likely than bus-only passengers to indicate that they drove alone at least part of the way from their final RTD stops to their final destinations (26% versus 6%);

- Train-only participants were more likely than bus-only passengers to indicate that they were picked up from their final RTD stops and dropped off at their final destinations (9% versus 4%); and
- Train-only participants were more likely than bus-only passengers to indicate that they carpooled at least part of the way from their final RTD stops to their final destinations (2% versus 1%).

Figure 5.
Mode of travel to final destination



Notes: **Denotes statistical significance at the 95% confidence level.

Participants could indicate multiple modes of travel, so percentages may not sum to 100%.

Source: 2019 RTD Customer Satisfaction Survey.

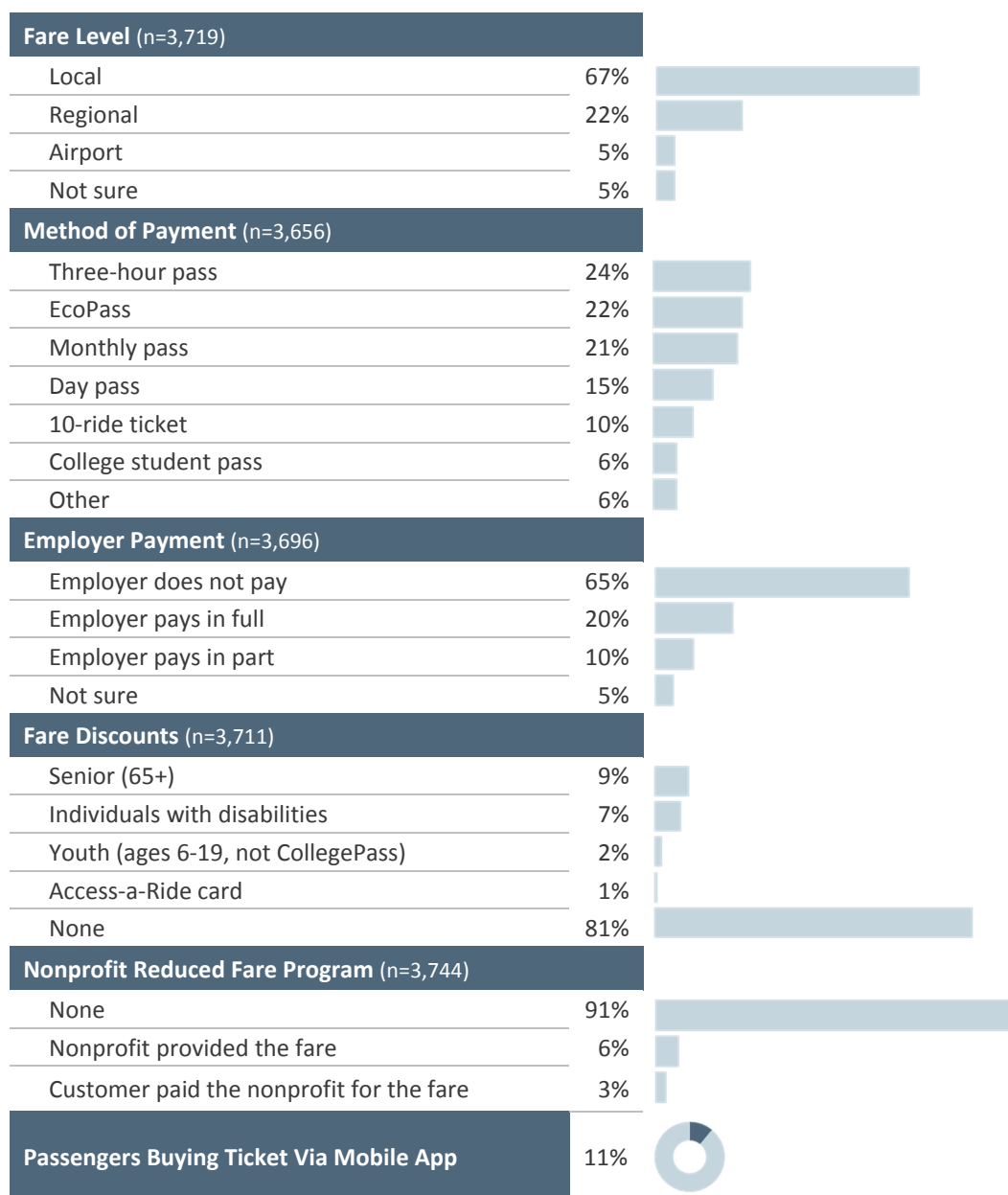
Fare Characteristics

The survey included questions about the fares passengers paid for the trip on which they received the survey, including fare levels they used; how they paid their fares; and whether they used special fare discounts. Figure 6 presents key results from the project team's analyses of those characteristics.³ As shown in Figure 6:

- Two-thirds of participants used the Local fare level (67%) and approximately one-fifth used the Regional fare level (22%);
- Approximately one-quarter of participants bought three-hour passes (24%), approximately one-fifth used EcoPasses to pay their fares (22%), and one-fifth used monthly passes to pay their fares (21%);
- Approximately one-tenth of participants indicated they bought their tickets using RTD's mobile ticketing app (11%);
- Approximately one-third of passengers indicated that their employers either paid all (20%) or part (10%) of their tickets; and
- The majority of passengers did not use any discounts (81%) or the Nonprofit Reduced Fare Program (91%) when paying their fares.

³ The following response options were combined into the category of "College student pass": CU-Boulder Student Pass, Auraria Student Pass, University of Denver Student Pass, and Other College Student Pass.

Figure 6.
Fare characteristics



Notes: Percentages may not add to 100% due to rounding.

Participants could indicate multiple methods of payments, so percentages may not sum to 100%.

Source: 2019 RTD Customer Satisfaction Survey.

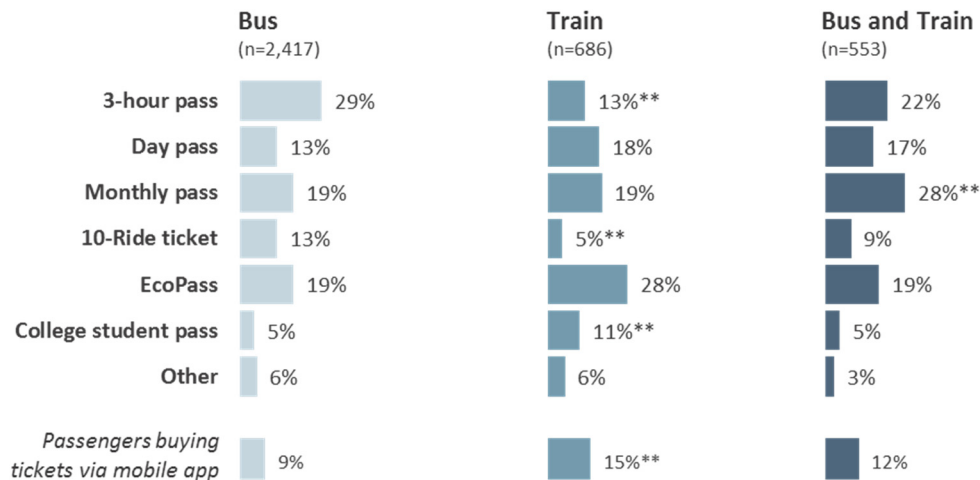
BBC further examined payment methods and how they differed among bus-only; train-only; and bus and train participants. As shown in Figure 7:

- Train-only participants were less likely than bus-only participants to indicate they bought three-hour passes (13% vs. 29%);
- Bus and train participants were more likely than bus-only participants to indicate they used monthly passes to pay their fares (28% vs. 19%);

- Train-only participants were less likely than bus-only participants to indicate they used 10-ride tickets to pay their fares (5% vs. 13%); and
- Train-only participants were more likely than bus-only participants to indicate they used college student passes to pay their fares (11% vs. 5%).

Train-only participants were also more likely than bus-only participants to indicate they used RTD's mobile application to buy their tickets.

Figure 7.
Method of payment by participant type



Notes: **Denotes statistical significance at the 95% confidence level.

Participants could indicate multiple methods of payments, so percentages may not sum to 100%.

Source: 2019 RTD Customer Satisfaction Survey.

Park-n-Ride

The survey included questions about the use of Park-n-Ride services. Participants were asked to indicate whether they parked a car at a Park-n-Ride on the day on which they received the survey, and 24 percent of participants indicated that they had done so.

Bike Use

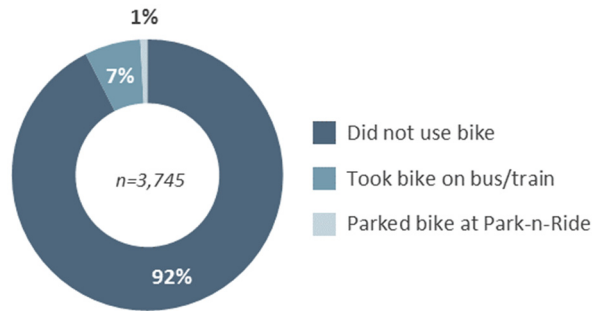
Participants were asked several questions about their bike use as it related to RTD services, including whether they parked a bike at a Park-n-Ride; took a bike with them on the bus or train; or did not use a bike on the day on which they received a survey. Figure 8 presents those results. The vast majority of passengers (92%) reported that they did not use a bike on the day on which they received the survey. Of the participants who did, nearly 90 percent of them reported taking their bikes with them on the bus or train.

RTD Use

The survey included questions about participants' use of RTD services, including the RTD services they used; how many total one-way trips they made on the day on which they received the survey; and how frequently they use RTD services.

Figure 8.
Bike Use on RTD Services

Source:
2019 RTD Customer Satisfaction Survey.

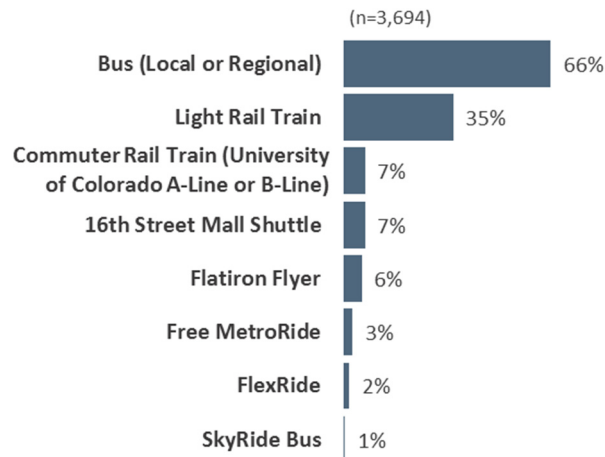


RTD services. Participants were asked to indicate all of the RTD services they used on the trip on which they received the survey. As shown in Figure 9, approximately two-thirds participants indicated that they took at least one bus trip during the trip on which they received the survey (66%). Thirty-five percent of passengers indicated that they rode on a light rail train at some point during their trip. Less than 10 percent of passengers indicated using any other RTD service during the trip on which they received the survey.

Figure 9.
RTD Services used on the survey trip

Note:
Participants could indicate multiple methods of payments, so percentages may not sum to 100%

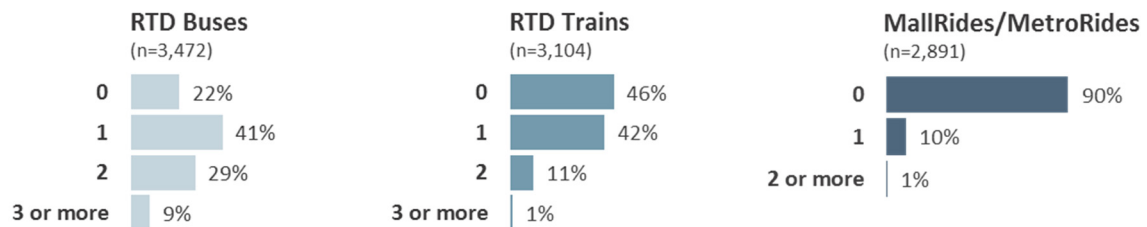
Source:
2019 RTD Customer Satisfaction Survey.



Vehicles by trip. RTD participants were asked to indicate how many total RTD vehicles they used or would use to complete their trip by service type: buses, trains, and MallRide/MetroRide. Figure 10 presents those results. As shown in Figure 10:

- More than three-fourths of participants indicated that they used at least one bus to complete their trip (78%) and more than one-third indicated that they used at two or more busses (37%);
- More than one-half of participants indicated that they used at least one train to complete their trip (54%) and 12% indicated that they used two or more trains; and
- Only 10 percent of participants indicated that they used a MallRide or MetroRide vehicle to complete their trip.

Figure 10.
Number of trips by service



Notes: **Denotes statistical significance at the 95% confidence level.

Percentages may not sum to 100% due to rounding.

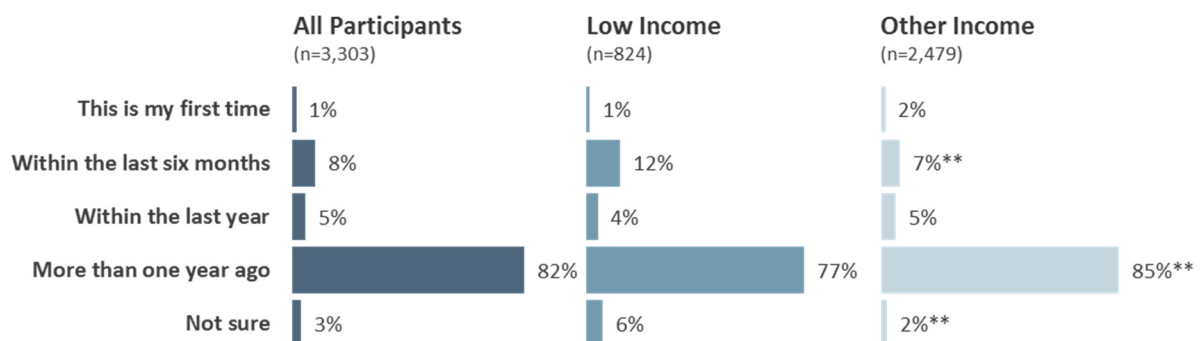
Source: 2019 RTD Customer Satisfaction Survey.

Frequency of RTD use. Participants were asked several questions about how frequently they use RTD services and how that frequency has changed over the past year. BBC examined whether there were any differences between low income participants and other income participants in regard to their use of RTD services.

First time use. To assess whether recent changes in lines, fare structures, and technology has attracted new RTD users, the survey asked participants to indicate when they used RTD services for the first time. Figure 11 shows those results for all participants considered together and separately for low income and other income participants. As shown in Figure 11:

- Overall, 15 percent of participants indicated that their first time using RTD was within the last year;
- Low income participants were more likely than other income participants to indicate that their first time using RTD was within the last six months (12% vs. 7%); and
- Low income participants were less likely than other income participants to indicate that their first time using RTD was more than a year ago (77% versus 85%).

Figure 11.
First time use of RTD services



Notes: **Denotes statistical significance at the 95% confidence level.

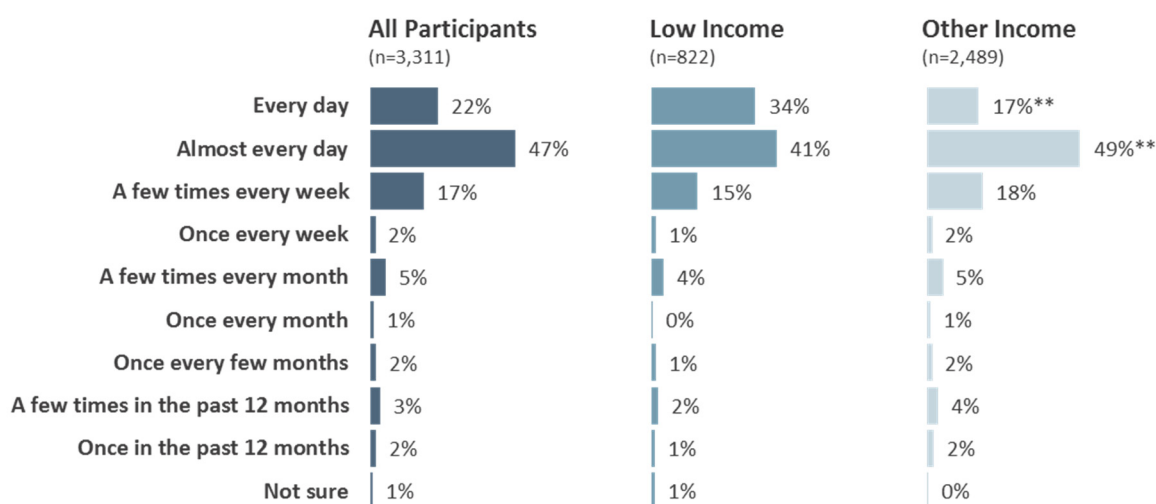
Percentages may not sum to 100% due to rounding.

Source: 2019 RTD Customer Satisfaction Survey.

Frequency of use. Participants were also asked how often they used RTD services in the past year. Figure 12 shows those results for all participants considered together and separately for low income and other income participants. As shown in Figure 12:

- Overall, more than two-thirds of participants indicated that they used RTD every day or almost every day in the past year (69%);
- Low income participants were more likely than other income participants to indicate that they used RTD every day in the past year (34% versus 17%); and
- Low income participants were less likely than other income participants to indicate that they used RTD almost every day in the past year (41% vs. 49%).

Figure 12.
Frequency of RTD use in past year



Notes: **Denotes statistical significance at the 95% confidence level.

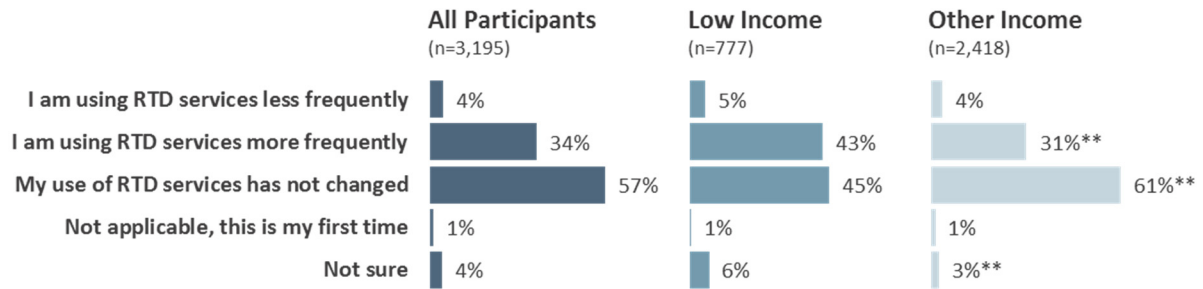
Percentages may not sum to 100% due to rounding.

Source: 2019 RTD Customer Satisfaction Survey.

Changes in frequency of use. Participants were also asked to indicate if the frequency of their use of RTD services has changed over the past year. Figure 13 shows those results for all participants considered together and separately for low income and other income participants. As shown in Figure 13:

- Overall, approximately one-third of participants indicated that they use RTD services more frequently than in the past (34%);
- Low income participants were more likely than other income participants to indicate that they use RTD services more frequently than in the past (43% vs. 31%); and
- Low income participants were less likely than other income participants to indicate that their use of RTD services has not changed in the past year (45% versus 61%).

Figure 13.
Changes in frequency of RTD use in past year



Notes: **Denotes statistical significance at the 95% confidence level.

Percentages may not sum to 100% due to rounding.

Source: 2019 RTD Customer Satisfaction Survey.

Quality of RTD Services

The survey included several questions about the quality of various aspects of RTD services, including:

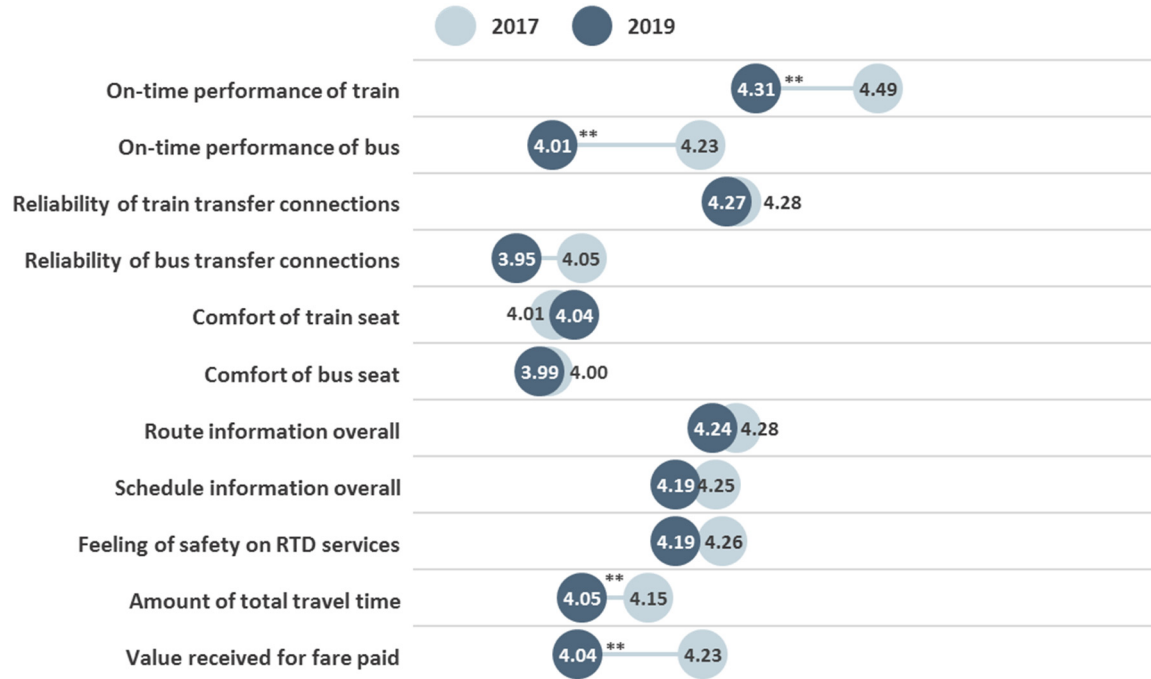
- On-time performance;
- Amount of travel time;
- Reliability of transfers;
- Safety and comfort;
- Route and schedule information;
- Value; and
- Overall quality.

Passengers were asked to rate the quality for each aspect on a scale from 1 to 5, where 1 indicated *poor* and 5 indicated *excellent*. BBC calculated average quality ratings for all RTD passengers and compared quality ratings between 2019 and 2017.

Quality of service aspects. Participants were asked several questions about the quality of various aspects of RTD services including on-time performance; amount of travel time; reliability of transfers; safety; comfort; and route and schedule information. The survey asked passengers to rate each aspect with which they had experience. Results for 2019 and 2017 are presented in Figure 14. Overall, participants in 2019 indicated that the quality of all aspects of RTD services is quite high. The average quality ratings across all aspects of RTD services ranged from 3.95 and 4.31. However, in general, quality ratings appeared to be somewhat lower in 2019 than in 2017. Specifically, quality ratings were lower in 2019 than in 2017 for:

- On-time performance of trains (4.31 vs. 4.49);
- On-time performance of buses (4.01 vs. 4.23);
- Amount of total travel time (4.05 vs. 4.15); and
- Value received for the fare that passengers paid (4.04 vs. 4.23).

Figure 14.
Average quality ratings of various service aspects



Notes: **Denotes statistical significance at the 95% confidence level.

Source: 2019 RTD Customer Satisfaction Survey.

Quality of RTD customer service. The survey included several questions about RTD customer service, including whether participants contacted customer service in the past month, how they did so, whether their issues were successfully resolved, and their satisfaction with RTD customer service. Overall, 23 percent of participants indicated that they contacted RTD customer service in the past month. As shown in Figure 15, more than three-quarters of those participants spoke to a live operator (77%), and more than one-half of them had their issues successfully resolved (56%). Participants were also asked to rate their satisfaction with RTD customer service on a scale from 1 to 5, where 1 indicated *very dissatisfied* and 5 indicated *very satisfied*. The average satisfaction rating for RTD customer service was 3.84, indicating that participants were moderately satisfied.

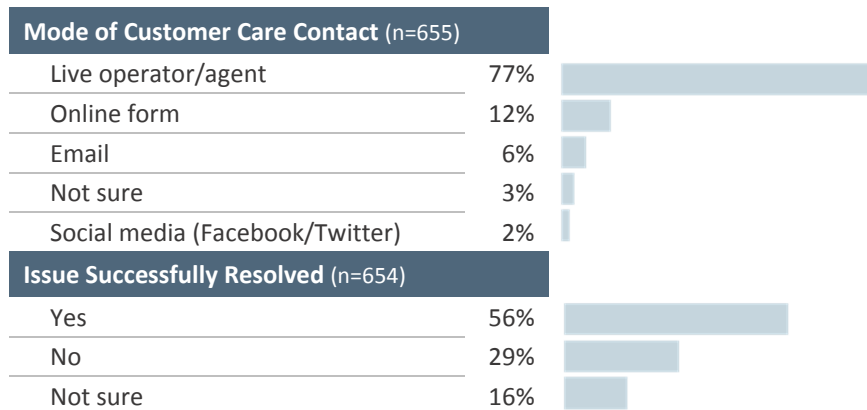
Figure 15.
Characteristics of
customer service
experiences

Note:

Percentages may not sum
100% due to rounding.

Source:

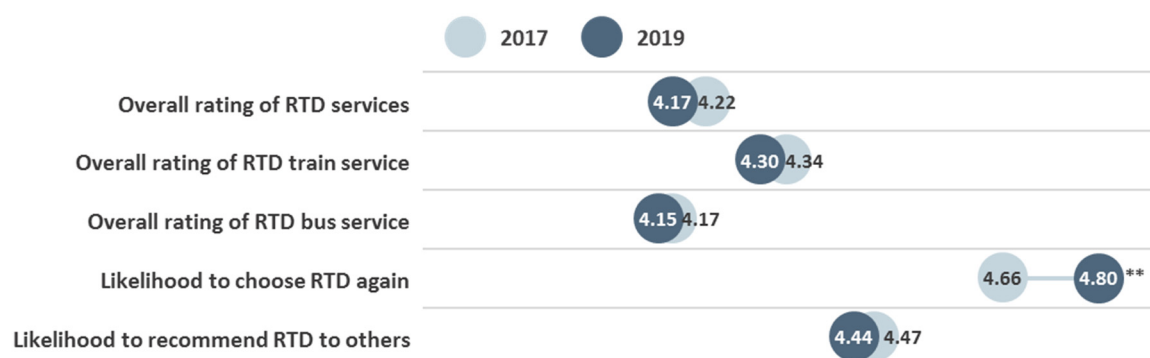
2019 RTD Customer
Satisfaction Survey.



Overall quality. Participants were also asked several questions related to the overall quality of RTD services, including their likelihood to choose to use RTD again and to recommend RTD to others. Results for 2019 and 2017 are presented in Figure 16. In general, participants in 2019 rated the overall quality of RTD services quite high, as they did in 2017. The average quality ratings for overall RTD services (average quality = 4.17), overall train service (average quality = 4.30), and overall bus service (average quality = 4.15) exceeded 4.0. In addition, participants indicated that they were very likely to choose to use RTD again (average likelihood = 4.80) and to recommend RTD to others (average likelihood = 4.44). In fact, participants in 2019 were more likely than participants in 2017 to indicate that they were likely to choose to use RTD again (average likelihood of 4.80 vs. 4.66).⁴

The survey also included a question about participants' overall satisfaction with RTD services, which conceptually, was very similar to the question asking participants to rate the overall quality of RTD services. The average rating for overall satisfaction with RTD services was 4.26, similar to the average overall rating of RTD services (4.17).

Figure 16.
Overall quality of RTD services



Notes: **Denotes statistical significance at the 95% confidence level.

Source: 2019 RTD Customer Satisfaction Survey.

Relationship between aspect quality and overall quality. BBC conducted regression analyses to examine whether participants' perceptions of the quality of particular aspects of RTD services predict their perceptions of the overall quality of RTD services, their likelihood to choose to use RTD in the future, and their likelihood to recommend RTD to others. BBC regressed each of those outcomes on participants' ratings of the quality of different aspects of RTD services, including on-time performance; amount of travel time; reliability of transfers; feelings of safety and comfort; route and schedule information; and the value received for the fare amount.

Overall rating of RTD services. BBC first examined the relationships between participants' ratings of the overall quality of RTD services and their ratings of the quality of individual aspects of RTD services. The corresponding regression coefficients are presented in Figure 17. As shown in Figure 17, the quality of several individual aspects that BBC included in the regression model

⁴ RTD used different scale labels for questions having to do with the likelihood to choose RTD again and the likelihood to recommend RTD to others in 2019 than in 2017. In 2019, the scale went from 1 ("very unlikely") to 5 ("very likely"), whereas in 2017, the scale went from 1 ("poor") to 5 ("excellent").

were independently, positively, and significantly related to the overall quality of RTD services. That is, higher ratings of the quality of those aspects predicted higher ratings of the overall quality of RTD services. The three aspects whose quality had the strongest relationships with overall quality were:

- On-time bus performance (regression coefficient = 0.18).
- Value received for the fare amount (regression coefficient = 0.17); and
- Train seat comfort (regression coefficient = 0.08).

Figure 17.

Relationships between overall quality of RTD and quality of individual aspects of service

Aspect of RTD Service	Mean	n	Regression Coefficient	Significance
Overall rating of RTD services	4.17	3,633		
On-time performance of bus	4.01	3,324	0.18	**
On-time performance of train	4.31	2,138	0.06	**
Amount of total travel time	4.05	3,616	0.11	
Reliability of bus transfer connections	3.95	2,208	0.04	**
Reliability of train transfer connections	4.27	1,661	0.09	
Feeling of safety on RTD services	4.19	3,683	0.06	**
Comfort of bus seat	3.99	3,309	0.06	**
Comfort of train seat	4.04	2,196	0.08	**
Route information overall	4.24	3,615	0.05	
Schedule information overall	4.19	3,638	0.11	
Value received for fare paid	4.04	3,528	0.17	**

Notes: **Denotes statistical significance at the 95% confidence level.

Source: 2019 RTD Customer Satisfaction Survey.

Likelihood of choosing to use RTD again. BBC also examined the relationship between participants' likelihood of choosing to use RTD again and the quality of different aspects of RTD services. As shown in Figure 18, the quality of two aspects was independently, positively, and significantly related to the reported likelihood of choosing to use RTD again:

- Reliability of train transfers (regression coefficient = 0.09); and
- Feeling of safety on RTD services (regression coefficient = 0.04).

Figure 18.
Relationships between likelihood of choosing to use RTD again and quality of individual aspects of service

Aspect of RTD Service	Mean	n	Regression Coefficient	Significance
Likelihood to choose RTD again	4.80	3,753		
On-time performance of bus	4.01	3,324	0.01	
On-time performance of train	4.31	2,138	0.06	
Amount of total travel time	4.05	3,616	0.03	
Reliability of bus transfer connections	3.95	2,208	-0.01	
Reliability of train transfer connections	4.27	1,661	0.09	**
Feeling of safety on RTD services	4.19	3,683	0.04	**
Comfort of bus seat	3.99	3,309	0.03	
Comfort of train seat	4.04	2,196	0.02	
Route information overall	4.24	3,615	0.03	
Schedule information overall	4.19	3,638	-0.01	
Value received for fare paid	4.04	3,528	0.04	

Notes: **Denotes statistical significance at the 95% confidence level.

Source: 2019 RTD Customer Satisfaction Survey.

Likelihood to recommend RTD to others. In addition, BBC examined the relationships between passengers' likelihood to recommend RTD to others and the quality of various aspects of services. As shown in Figure 19, the quality of several aspects was independently, positively, and significantly related to the reported likelihood to recommend RTD to others. The three aspects whose quality had the strongest relationships with overall quality were:

- Amount of total travel time (regression coefficient = 0.19).
- Value received for the fare amount (regression coefficient = 0.15); and
- On-time bus performance (regression coefficient = 0.10).

In addition, the quality ratings of the route information that RTD provides was significantly but negatively related to the reported likelihood to recommend RTD to others: route information overall (regression coefficient = -0.08). It is not clear why higher perceived quality of the route information that RTD provides would be related to lower likelihood to recommend RTD to others, but it may warrant further examination in future research.

Figure 19.
Relationships between likelihood to recommend RTD to others and quality of individual aspects of service

Aspect of RTD Service	Mean	n	Regression Coefficient	Significance
Likelihood to recommend RTD to others	4.44	3,731		
On-time performance of bus	4.01	3,324	0.10	**
On-time performance of train	4.31	2,138	0.09	**
Amount of total travel time	4.05	3,616	0.19	**
Reliability of bus transfer connections	3.95	2,208	-0.02	
Reliability of train transfer connections	4.27	1,661	0.08	
Feeling of safety on RTD services	4.19	3,683	0.09	**
Comfort of bus seat	3.99	3,309	0.06	
Comfort of train seat	4.04	2,196	-0.02	
Route information overall	4.24	3,615	-0.08	**
Schedule information overall	4.19	3,638	0.05	**
Value received for fare paid	4.04	3,528	0.15	**

Notes: **Denotes statistical significance at the 95% confidence level.

Source: 2019 RTD Customer Satisfaction Survey.

SECTION IV.

Discussion

The 2019 RTD Customer Satisfaction Survey revealed important information about customers' experiences and satisfaction with RTD services. RTD can use that information to refine its services and continue meeting its customers' needs in the future. Passengers shared their experiences with and perceptions of various aspects of RTD services such as RTD use; payment and use of discounts; travel to and from RTD stops and stations; and the quality of RTD services. Key results from the 2019 RTD Customer Satisfaction Survey include the following:

- RTD passengers perceive the overall quality of RTD services as very high. The average rating of the overall quality of RTD services was 4.17 on a 5-point scale.
- RTD passengers rate the quality of all aspects of RTD service as very high. Average quality ratings of various aspects of RTD services varied between 3.95 and 4.31 out of 5.
- RTD continues to deliver high value for the fares that they charge. The average rating of the value that passengers received from the fare that they paid was 4.04 out of 5.
- In general, passenger satisfaction for certain service aspects have decreased since 2017—including on-time performance and perceived value of RTD fares—but it nonetheless remains relatively high.
- Passengers are very likely to choose to use RTD again and recommend RTD to others. Average likelihood ratings were 4.80 and 4.44 out of 5, respectively. Moreover, the likelihood for passengers to choose to use RTD again increased substantially since 2017.
- On-time performance and fare value are important predictors of passengers' perceptions of the overall quality of RTD services and their likelihood to recommend RTD to others. Reliability of transfers and feelings of safety are important predictors of passengers' likelihood to choose to use RTD again.
- Relatively few passengers use RTD's mobile ticketing application to purchase their fares.
- Changes that RTD has implemented over the past few years may be resulting in increased usage—a substantial portion of passengers indicate that they use RTD more frequently than in the past, and RTD has attracted many first-time passengers in the past year.

RTD should consider the information above and additional information from the 2019 RTD Customer Satisfaction Survey. Several potential recommendations emerged from the analyses:

- Overall, RTD passengers had very positive perceptions of the quality and value of RTD services. However, passenger satisfaction for certain service aspects have decreased since 2017, including on-time performance and fare value. RTD should continue to monitor satisfaction with those service aspects as it considers operational refinements.
- The on-time performance of buses, comfort of bus seats, and the reliability of bus transfers continue to be among the service aspects that receive the lowest quality ratings. RTD should continue to explore ways in which they could improve those service aspects,

because they have important relationships with passengers' perceptions of the overall quality of RTD services.

- Although the uptake and usage of RTD's mobile ticketing application is quite low—only 11 percent of passengers reported using it as part of the survey—anecdotal information indicates that the passengers who do use it appreciate its convenience. RTD should consider exploring ways to increase communication about the mobile ticketing application and encouraging passengers to use it.
- The frequency of RTD usage appears to have increased over the past year, and RTD also appears to be attracting new passengers. The district might consider additional research to better understand what factors are leading Denver residents to use RTD more, and how it can continue encouraging that increase.

APPENDIX A.

Survey Instrument



RTD Customer Satisfaction Survey

Dear RTD Customer:

We need your help in evaluating our services. Please take a few minutes to complete this questionnaire. It is important that we obtain your honest opinions, whether favorable or unfavorable, to help us identify areas that need improvement.

In appreciation of your help, we are enclosing *two free ride coupons* that you can use on any RTD Local, Regional, or Airport bus or rail service. See back of coupon for details.

Please return your completed survey to RTD in the enclosed, postage-paid envelope or complete the survey online by going to www.rtd-denver.com/2019survey before March 31, 2019. If you return your completed survey, or complete an online survey, by March 31, 2019 you will be entered in a drawing to win one of ten \$100 VISA gift cards. To enter the drawing, please print your name, address, and telephone number in the space provided on the last page of the questionnaire. Your survey responses will be kept strictly confidential and will be reported in summary form only.

If you have any questions regarding this survey, please call 303-299-6000.

Llámenos al 303-299-6000 para una versión español de esta encuesta, o completa la encuesta en el sitio web www.rtd-denver.com/2019survey-sp.

Thank you for your time and feedback.

David A. Genova, RTD General Manager and CEO

SECTION 1: SERVICE USE

For this section, please tell us about **the one-way trip** you were taking when you received this survey.

Examples of a one-way trip include:

- *Going from your home to work/school*
- *Going from work/school to your home*
- *A multi-stop trip (e.g. going from a doctor's appointment, to the pharmacy, and then home)*

1. Which of the following RTD services were you riding when you received this survey? (One response only, please.)

- | | |
|--|---|
| <input type="radio"/> Bus (Local or Regional) | <input type="radio"/> Commuter Rail Train (University of Colorado A-Line or B-Line) |
| <input type="radio"/> Flatiron Flyer | <input type="radio"/> Light Rail Train |
| <input type="radio"/> SkyRide Bus | <input type="radio"/> FlexRide |
| <input type="radio"/> 16 th Street Mall Shuttle | <input type="radio"/> Other (Please specify) _____ |
| <input type="radio"/> Free MetroRide | |

2. What time did you begin this trip?

- | | |
|--------------------------------------|--------------------------------------|
| <input type="radio"/> 3 AM – 5:59 AM | <input type="radio"/> 3 PM – 5:59 PM |
| <input type="radio"/> 6 AM – 8:59 AM | <input type="radio"/> 6 PM – 2:59 AM |
| <input type="radio"/> 9 AM – 2:59 PM | |

3. Thinking specifically about the trip you were on when you received this survey, what was the primary purpose of this trip? (*One response only, please.*)

- | | |
|---|--|
| <input type="radio"/> Commuting to or from work | <input type="radio"/> To/from shopping/eating out |
| <input type="radio"/> Social/entertainment purposes | <input type="radio"/> To/from school/college |
| <input type="radio"/> To/from medical appointment | <input type="radio"/> Other (Please specify) _____ |
| <input type="radio"/> Personal business | |

4. How did you pay for your fare for this trip? (*Check all that apply.*)

- | | |
|--|---|
| <input type="checkbox"/> Cash/Credit 3-hour pass (Ticket Vending Machine or Farebox) | <input type="checkbox"/> Business EcoPass |
| <input type="checkbox"/> 3 hour-pass from Mobile Tickets app | <input type="checkbox"/> Neighborhood EcoPass |
| <input type="checkbox"/> Cash/Credit Day Pass (Ticket Vending Machine or Farebox) | <input type="checkbox"/> CU-Boulder Student Pass |
| <input type="checkbox"/> Day pass from Mobile Tickets App | <input type="checkbox"/> Auraria Student Pass |
| <input type="checkbox"/> 10-Ride ticket | <input type="checkbox"/> University of Denver Student Pass |
| <input type="checkbox"/> Monthly pass | <input type="checkbox"/> Other College Student Pass (Specify) _____ |
| <input type="checkbox"/> Monthly pass from Mobile Tickets app | |
| <input type="checkbox"/> MyRide Stored Value Smart Card | <input type="checkbox"/> Longmont Free Fare Pilot Program |
| | <input type="checkbox"/> Other (Please specify) _____ |

5. Which fare level did you use for this trip?

- | | |
|--------------------------------|--------------------------------|
| <input type="radio"/> Local | <input type="radio"/> Airport |
| <input type="radio"/> Regional | <input type="radio"/> Not sure |

6. Which of the following discounts, if any, did you use for this trip? (*One response only, please.*)

- | | |
|--|--|
| <input type="radio"/> Senior (65+) | <input type="radio"/> Access-a-Ride card |
| <input type="radio"/> Individuals with Disabilities | <input type="radio"/> None of these |
| <input type="radio"/> Youth (Ages 6-19, <i>not CollegePass</i>) | |

7. Did you receive your fare through the Nonprofit Reduced Fare program?

- ☐ Yes, the nonprofit or government agency provided my fare
- ☐ Yes, I paid the nonprofit or government agency for all/part of my fare
- ☐ No

8. Did your employer pay for all or part of your fare? (e.g., through EcoPass, FlexPass, or other means)

- | | |
|---|---|
| <input type="radio"/> Yes, my employer pays my fare in full | <input type="radio"/> No, I paid for all of my fare |
| <input type="radio"/> Yes, my employer pays part of my fare | <input type="radio"/> Not sure |

9. How did you get to the first RTD vehicle you boarded for this trip? (*Check all that apply.*)

- | | |
|--|--|
| <input type="checkbox"/> Walked | <input type="checkbox"/> Bikeshare (e.g., B-Cycle, JUMP, etc.) |
| <input type="checkbox"/> Drove alone | <input type="checkbox"/> Scooter (e.g., Bird, Lime, etc.) |
| <input type="checkbox"/> Picked up/Dropped off | <input type="checkbox"/> Rideshare (e.g., Uber, Lyft) |
| <input type="checkbox"/> Carpooled | <input type="checkbox"/> Carshare (e.g., Zipcar, Enterprise, etc.) |
| <input type="checkbox"/> Bicycled | <input type="checkbox"/> Other (Please specify) _____ |

10. Thinking about your last RTD stop on this trip, how will you get to your destination? (Check all that apply.)

- | | |
|---|--|
| <input type="checkbox"/> Walk | <input type="checkbox"/> Bikeshare (e.g., B-Cycle, JUMP, etc.) |
| <input type="checkbox"/> Drive alone | <input type="checkbox"/> Scooter (e.g., Bird, Lime, etc.) |
| <input type="checkbox"/> Pick up/Drop off | <input type="checkbox"/> Rideshare (e.g., Uber, Lyft) |
| <input type="checkbox"/> Carpool | <input type="checkbox"/> Carshare (e.g., car2go, Zipcar, Enterprise, etc.) |
| <input type="checkbox"/> Bicycle | <input type="checkbox"/> Other (Please specify) _____ |

11. Will/did you make a transfer to another RTD service or vehicle on this trip?

- ☐ Yes
☐ No

12. How many of the following RTD services and vehicles will/did you use to complete this trip? Please count the number of individual RTD vehicles you rode/will ride if you will/did make a transfer. (Please write "0" if none.)

Number of buses: _____

Number of trains: _____

Number of MallRide/MetroRide: _____

13. Which of the following RTD services will/did you use to complete this trip? (Check all that apply.)

- | | |
|---|--|
| <input type="checkbox"/> Bus (Local or Regional) | <input type="checkbox"/> Commuter Rail Train (University of Colorado A-Line or B-Line) |
| <input type="checkbox"/> Flatiron Flyer | <input type="checkbox"/> Light Rail Train |
| <input type="checkbox"/> SkyRide Bus | <input type="checkbox"/> FlexRide |
| <input type="checkbox"/> 16 th Street Mall Shuttle | <input type="checkbox"/> Access-a-Ride/Access-a-Cab |
| <input type="checkbox"/> Free MetroRide | <input type="checkbox"/> Other (Please specify) _____ |

14. Approximately how long will it take you to travel from your origin to your destination on this trip? Please provide your total one-way travel time in minutes.

Total one-way travel time in minutes: _____

15. Did you park a car at a Park-n-Ride today?

- ☐ Yes
☐ No

16. Did you park a bike at a Park-n-Ride today?

- ☐ Yes, I parked a bike at a Park-n-Ride today
☐ No, I took my bike with me on the bus/train
☐ Not applicable, I did not use a bike today

17. How many total trips will you/did you make using RTD on the day you received your survey? A round trip counts as two trips.

Number of trips: _____

18. When was the first time you used an RTD service of any kind?

- | | |
|--|--|
| <input type="radio"/> This is my first time using an RTD service | <input type="radio"/> Within the last year |
| <input type="radio"/> This month | <input type="radio"/> More than one year ago |
| <input type="radio"/> Within the last six months | <input type="radio"/> Not sure |

19. Including your trip today, about how frequently have you used RTD services in the past 12 months?

- | | |
|---|--|
| <input type="radio"/> Once in the past 12 months | <input type="radio"/> Once every week |
| <input type="radio"/> A few times in the past 12 months | <input type="radio"/> A few times every week |
| <input type="radio"/> Once every few months | <input type="radio"/> Almost every day |
| <input type="radio"/> Once every month | <input type="radio"/> Every day |
| <input type="radio"/> A few times every month | <input type="radio"/> Not sure |

20. How has your use of RTD services changed in the past 12 months, if at all?

- | | |
|--|--|
| <input type="radio"/> My use of RTD services has not changed | <input type="radio"/> Not applicable, this is my first time using an RTD service |
| <input type="radio"/> I am using RTD services <u>more</u> frequently | <input type="radio"/> Not sure |
| <input type="radio"/> I am using RTD services <u>less</u> frequently | |

SECTION 2: SATISFACTION

21. How satisfied are you with RTD services overall?

<u>Very Dissatisfied</u>				<u>Very Satisfied</u>	Don't Know/ Not Applicable
1	2	3	4	5	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

22. How likely are you to choose RTD again in the future?

<u>Very Unlikely</u>				<u>Very Likely</u>	Don't Know/ Not Applicable
1	2	3	4	5	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

23. How likely are you to recommend RTD to others?

<u>Very Unlikely</u>				<u>Very Likely</u>	Don't Know/ Not Applicable
1	2	3	4	5	
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

24. How many times have you contacted RTD's Customer Care in the past 30 days?

Please write in your answer: _____ *(If 0, skip to Question 28.)*

25. How satisfied are you with RTD's Customer Care overall?

Very Dissatisfied 1	2	3	4	Very Satisfied 5	Don't Know/ Not Applicable
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

26. Thinking of the most recent time you contacted Customer Care, how did you initially contact Customer Care? (*One response only, please.*)

- ☐ Online form
 ☐ Social media (Facebook/Twitter)
- ☐ Email
 ☐ Not sure
- ☐ Live operator/Agent

27. Thinking again of the most recent time you contacted Customer Care, was your issue resolved successfully?

- ☐ Yes
- ☐ No
- ☐ Not sure

28. Thinking about all of your experiences using RTD, please rate the following aspects of RTD service. Please rate each aspect for which you have experience. If you do not have experience with an aspect, select "Don't Know/Not Applicable."

	Poor 1	2	3	4	Excellent 5	Don't Know/Not Applicable
a) On-time performance of your bus	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) On-time performance of your train	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Amount of total travel time from origin to final destination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d) Reliability of bus transfer connections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e) Reliability of train transfer connections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f) Feeling of safety on RTD services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g) Comfort of bus seat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h) Comfort of train seat	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i) Route information overall	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
j) Schedule information overall	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k) Value received for the fare you paid for this trip	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
l) Overall rating of RTD bus service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
m) Overall rating of RTD train service	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
n) Overall rating of RTD services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

SECTION 3: DEMOGRAPHICS

29. How many vehicles (cars, trucks, vans, motorcycles) are kept at home for use by members of your household? (Put "0" if none.)

Number of vehicles: _____

30. Do you currently have a disability or medical condition that prevents you from driving a vehicle?

- ☐ Yes
- ☐ No

31. Do you have a valid driver's license?

- ☐ Yes
- ☐ No

32. Including yourself, how many people live in your household? _____

33. Which of the following categories best describes your occupation/employment status? (One response only, please.)

- | | |
|---|---|
| <input type="radio"/> Professional/Managerial | <input type="radio"/> Homemaker |
| <input type="radio"/> Sales/Clerical/Service | <input type="radio"/> Retired |
| <input type="radio"/> Laborer/Craftsman/Foreman | <input type="radio"/> Disabled (unable to work) |
| <input type="radio"/> Student (employed) | <input type="radio"/> Unemployed (looking for work) |
| <input type="radio"/> Student (only) | <input type="radio"/> Other (Please specify) _____ |

34. In which county do you currently live?

- | | |
|----------------------------------|-----------------------------------|
| <input type="radio"/> Adams | <input type="radio"/> Douglas |
| <input type="radio"/> Arapahoe | <input type="radio"/> Jefferson |
| <input type="radio"/> Boulder | <input type="radio"/> Weld |
| <input type="radio"/> Broomfield | <input type="radio"/> Other _____ |
| <input type="radio"/> Denver | |

35. With which gender do you identify?

- ☐ Male
- ☐ Female
- ☐ Other

36. What is your age?

- | | |
|--------------------------------|-----------------------------------|
| <input type="radio"/> Under 18 | <input type="radio"/> 45-54 |
| <input type="radio"/> 18-24 | <input type="radio"/> 55-64 |
| <input type="radio"/> 25-34 | <input type="radio"/> 65 or older |
| <input type="radio"/> 35-44 | |

37. What is the highest level of formal education you have completed?

- | | |
|--|--|
| <input type="radio"/> Less than 12 years | <input type="radio"/> College graduate |
| <input type="radio"/> High school graduate | <input type="radio"/> Post graduate degree |
| <input type="radio"/> Some college | |

38. Which of the following categories best describes your racial/ethnic background? (*One response only, please.*)

- | | |
|--|--|
| <input type="radio"/> African-American/Black | <input type="radio"/> Hispanic/Latino |
| <input type="radio"/> Asian/Pacific Islander | <input type="radio"/> Native American/Indian |
| <input type="radio"/> Caucasian/White – not of Hispanic origin | <input type="radio"/> Other (Please specify) _____ |

39. Which one of the following categories best describes the total annual income, before taxes, for all persons in your household?

- | | |
|--|--|
| <input type="radio"/> Up to \$22,499 | <input type="radio"/> \$54,500 to \$63,499 |
| <input type="radio"/> \$22,500 to \$30,499 | <input type="radio"/> \$63,500 to \$70,499 |
| <input type="radio"/> \$30,500 to \$38,499 | <input type="radio"/> \$70,500 to \$78,499 |
| <input type="radio"/> \$38,500 to \$46,499 | <input type="radio"/> \$78,500 or more |
| <input type="radio"/> \$46,500 to \$54,499 | |



PLEASE COMPLETE IF YOU WISH TO ENTER THE DRAWING.

Name: _____	ZIP code: _____
Address: _____	Phone: _____
City: _____	

Email Address: _____

Providing your email will allow you to receive important communications and special offers from RTD. Your email address will not be rented, traded, or sold.

THANK YOU FOR YOUR FEEDBACK IN THIS SURVEY. WE SINCERELY APPRECIATE IT!
Please fold this questionnaire and return it to RTD in the enclosed postage-paid envelope.