

# 2025-2028 Title VI Program Update

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





# 2025-2028 Title VI Program Update

Original artwork by Dez Merworth (She/They). Right side of the image, front to back: Rosa Parks, Mary Louise Ware (née Smith), Bayard Rustin, and George Houser. Left side of the image, front to back: Judith Heumann, Kamaladevi Chattopadhyay, Claudette Colvin, and E.D. Nixon.

**PLEASE NOTE:**

THE CONTENT IN THIS DOCUMENT IS SUBJECT TO CHANGE PRIOR TO BOARD APPROVAL AND ADOPTION.

# RTD 2025-2028 Title VI Program

## Table of Contents

Acronyms.....	3
Definitions.....	3
Introduction .....	5
General Requirements.....	6
<i>Title VI Public Notice</i> .....	7
Title VI Statement.....	7
Title VI Public Notice in RTD Vehicles.....	7
Title VI Public Notice in Sales Outlets.....	10
Other Civil Rights Information .....	11
<i>Title VI and CRS §24-34-601 Complaint Procedures</i> .....	13
<i>List of Title VI Investigations, Complaints, and Lawsuits</i> .....	14
Investigations .....	14
Lawsuits .....	14
Complaints .....	14
Trainings to Enhance Service Delivery and Compliance .....	14
<i>Public Participation Plan: Overview</i> .....	17
<i>Language Access Plan: Overview</i> .....	17
<i>Subrecipient Monitoring</i> .....	17
General Requirements.....	17
Smart Commute Metro North.....	18
Transit-related Contractors.....	18
<i>Equity Analysis for Facilities Siting and Construction</i> .....	19
Siting Facility Statement .....	19
Facility Siting Framework.....	20
Standard Process for Facility Siting and Construction .....	20
<i>Requirements for Fixed-Route Transit Providers</i> .....	22
<i>Title VI Policies</i> .....	22
Changes from the 2022-2025 Title VI Policies .....	22
Service Equity Analyses .....	23
Fare Equity Analyses .....	25
<i>Equity Analyses of Major Service and Fare Changes Since 2022 Submission</i> .....	26
<i>Service Performance Monitoring</i> .....	26
<i>Demographic Analysis</i> .....	27
Current Network and Service Area.....	27
Facilities and Demographics Assessment.....	32
Description of Engagement Efforts to Update Title VI Program .....	45
<i>Engagement Efforts on the Overall Title VI Program Update</i> .....	45
<i>Engagement Efforts on the Language Access Plan</i> .....	46



# RTD 2025-2028 Title VI Program

Engagement Efforts on Title VI Policy Changes .....	46
Title VI Policies Survey Results .....	47
Attachments.....	52
Attachment A: Board Approval of 2025-2028 Title VI Program.....	52
Attachment B: Title VI Complaint Forms .....	55
Attachment C: Transit Equity Nondiscrimination Policy.....	123
Attachment D: Transit Equity Complaint Management Procedures.....	127
Attachment E: Public Participation Plan .....	137
Attachment F: Language Access Plan .....	260
Attachment G: Subrecipient Compliance Guide .....	418
Attachment H: Smart Commute Metro North Concurrence Letter .....	427
Attachment I: Smart Commute Metro North Signed Title VI Policy Statement .....	429
Attachment J: Allied Universal Title VI Concurrence Letter .....	431
Attachment K: Denver Transit Partners Title VI Concurrence Letter.....	433
Attachment L: Transdev Title VI Concurrence Letter .....	435
Attachment M: MTM Transit Title VI Concurrence Letter.....	437
Attachment N: January 2025 Service Equity Analysis.....	439
Attachment O: September 2024 Service Equity Analysis .....	510
Attachment P: Zero Fare for Youth Fare Equity Analysis .....	556
Attachment Q: May 2024 Service Equity Analysis .....	640
Attachment R: September 2023 Service Equity Analysis .....	689
Attachment S: Systemwide Fare Study and Equity Analysis.....	733
Attachment T: May 2023 Service Equity Analysis .....	882
Attachment U: January 2023 Service Equity Analysis.....	930
Attachment V: MyRide Stored Value Discount Fare Equity Analysis.....	972
Attachment W: 2022 Service Performance Monitoring Report.....	1,012
Attachment X: Transit Service Policies and Standards .....	1,032
Attachment Y: Title VI Proposed Policy Change Feedback .....	1,033

# RTD 2025-2028 Title VI Program

## Acronyms

<b>BIPOC</b>	Black, Indigenous, and People of Color
<b>CFR</b>	Code of Federal Regulations
<b>CRS</b>	Colorado Revised Statute
<b>DOT</b>	Department of Transportation
<b>LAP</b>	Language Access Plan
<b>LEP</b>	Limited English Proficiency or Limited English Proficient
<b>RTD</b>	Regional Transportation District
<b>FTA</b>	Federal Transit Administration
<b>USDOT</b>	United States Department of Transportation

## Definitions

The following terms and definitions are from the Federal Transit Administration (FTA) Circular 4702.1B unless otherwise noted.

**Colorado Revised Statute (CRS) §24-34-601** – As defined by the State of Colorado Civil Rights Commission Rules and Regulations, CRS §24-34-601 defines a public accommodation as a place of business that offers services, facilities, privileges, advantages, or accommodations open to the public, including any public transportation facility or services. The statute prohibits discrimination in refusing, withholding from, or denying 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.

**Contractor** – As defined by the Regional Transportation District (RTD), a non-federal entity that receives a contract from RTD to provide goods and services for the agency's own use.

**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 people 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 disproportionate burden finding requires the recipient to evaluate alternatives and mitigate burdens where practicable.

# RTD 2025-2028 Title VI Program

**Fare Media** – As defined by RTD, a form of payment for transit service (e.g. cash fare, monthly pass).

**Fare Change** – As defined by RTD, an increase or 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) People** – People for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all. This document refers to LEP people as **linguistically diverse people** to the extent possible.

**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 200% of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

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

**Low-Income Transit Route** – As defined by RTD, 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 People** – 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 people 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

This document refers to minority people as **BIPOC**.

**Minority Population** – Any readily identifiable group of minority people 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. This document refers to minority populations as **BIPOC populations**.

**Minority Transit Route** – As defined by RTD, 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. This document refers to minority transit routes as **BIPOC transit routes**.

# RTD 2025-2028 Title VI Program

**National Origin** – As defined by RTD, the nation or region in which a person was born, or where the person's parents or ancestors were born. National origin protections include limited English proficiency.

**Non-Minority People** – White (non-Hispanic). This document refers to non-minority people or populations as **non-BIPOC people** or populations.

**Public Transportation** – Regular, continuing shared-ride surface transportation services that are open to the public or open to a segment of the general public defined by age, disability, or low-income; and 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 includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers and vans. 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 includes subrecipients, direct recipients, designated recipients, and primary recipients but 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 as a means 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 Provider** – As defined by RTD, 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.

## Introduction

The mission of the Regional Transportation District (RTD) is to make lives better through connections, and its vision is to be the trusted leader in mobility, delivering excellence and value to our customers and community. Title VI and equity are central to this mission and vision. An equitable mass transit system ensures that the benefits and burdens of service are distributed fairly, regardless of race, color, national origin, or income level. These principles are reinforced by Title VI of the Civil Rights Act of 1964, which prohibits discrimination in federally funded programs.

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." The intent of Title VI is to remove barriers and conditions that prevent minority people (hereafter referred to as Black, Indigenous and People of Color, or BIPOC) and people

# RTD 2025-2028 Title VI Program

with limited English proficiency (LEP)<sup>1</sup> 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 persons are entitled to equal protection of the law and specifically addresses the involvement of impacted people in the decision-making process.

Unlawful discrimination based on race, color, or national origin can limit opportunities for historically underserved communities to gain equal access to services and programs. In operating a federally assisted program, 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; 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. 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.

In this updated Title VI Program, the RTD Transit Equity Office under the Civil Rights Division has compiled a documentation of compliance efforts from May 2022 to April 2025. 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 2025-2028 Title VI Program.

The General Manager and Chief Executive Officer has overall responsibility for carrying out the agency's commitment to the Title VI Program. While RTD's Civil Rights Director and Transit Equity Manager are chiefly responsible for administering and monitoring Title VI compliance, it is the duty of every employee and contractor of the agency to ensure 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 the FTA.

## 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 2025-2028 Title VI Program.

The General Requirements section of this report contains Title VI Program components required in Chapter III of FTA Circular 4702.1B, including:

### 1. Title VI Public Notice

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<sup>1</sup> This document will hereafter refer to "people with limited English proficiency" or "limited English proficient people" as "linguistically diverse" people.

# RTD 2025-2028 Title VI Program

2. Title VI Complaint Procedures
3. List of Title VI Investigations, Complaints, and Lawsuits
4. Public Participation Plan
5. Language Access Plan
6. Committee Membership and Recruitment
7. Subrecipient Monitoring
8. Equity Analysis for Facilities Siting and Construction

## Title VI Public Notice

RTD, as a recipient of federal funds, must inform the public of its Title VI rights to file a complaint if they feel they have experienced discrimination when accessing RTD services. To ensure customers know their rights, RTD posts its Title VI public notice on its website at [www.rtd-denver.com/TitleVI](http://www.rtd-denver.com/TitleVI) and all vehicles (bus and rail) and in its administrative offices. The website also provides RTD's Title VI complaint forms and procedures in both digital and PDF formats. In 2024, RTD replaced the previous digital complaint form [with a new version](#) to improve functionality and support language access by ensuring the complaint form content is translatable via the website's built-in translation widget. The PDFs of the forms and procedures are available in the 21 safe harbor languages that RTD identified in its 2022 – 2025 Language Access Plan (Amharic, Arabic, Farsi, French, German, Hindi, Hmong, Japanese, Khmer, Laotian, Korean, Nepali, Russian, Somali, Swahili, Spanish, Simplified Chinese, Tagalog, Telugu, Thai, and Vietnamese). Please see **Attachment B** for copies of the complaint forms and **Attachment C** for the Transit Equity Nondiscrimination Policy (which includes RTD's Title VI public notice) that RTD posts at its administrative offices.

## Title VI Statement

RTD's Title VI public notice contains the following statement:

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](mailto:titlevicomplaints@rtd-denver.com); or visit [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi). Please allow up to three (3) business days for a response.

## Title VI Public Notice in RTD Vehicles

### *Fixed-Route Bus*

The following decal, Figure 1, is posted on the back of every fixed-route bus's operator stanchion. The notice provides a full Spanish translation of the entire public notice and includes a notification of language assistance in both Vietnamese and Simplified Chinese that reads, "Civil rights notice for the public: Please call 303.299.6000 to learn more about RTD's nondiscrimination requirements or to request language assistance services."



# RTD 2025-2028 Title VI Program

Figure 1. RTD's Title VI Public Notice in Fixed-Route Bus

## 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 [titlevi.complaints@rtd-denver.com](mailto:titlevi.complaints@rtd-denver.com); or visit [rtd-denver.com/titlevi](http://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 [titlevi.complaints@rtd-denver.com](mailto:titlevi.complaints@rtd-denver.com); o visite [rtd-denver.com/titlevi](http://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](http://rtd-denver.com/customer-comments)



For extra coverage, interior cards with an abbreviated version of the Title VI notice, as illustrated in Figure 2, are installed in the advertising space at the top of each fixed-route bus. The interior cards translate the entire abbreviated notice in Spanish, Vietnamese, and Simplified Chinese.

# RTD 2025-2028 Title VI Program

Figure 2. RTD's Title VI Interior Cards in Fixed-Route Bus

### 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](mailto:titlevicomplaints@rtd-denver.com); or visit [rtd-denver.com/titlevi](http://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](mailto:titlevicomplaints@rtd-denver.com); o visite [rtd-denver.com/titlevi](http://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](mailto:titlevicomplaints@rtd-denver.com)；或访问[rtd-denver.com/titlevi](http://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](mailto:titlevicomplaints@rtd-denver.com); hoặc truy cập [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi).



## Commuter and Light Rail Vehicles

Though slightly different in format to accommodate the rail environment, the Title VI public notice (Figure 3) in light rail and commuter rail vehicles contains the same content as the public notice in fixed-route buses, including the notification of language assistance in Vietnamese and Simplified Chinese.

Figure 3. RTD's Title VI Interior Cards in Rail

### 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](mailto:titlevicomplaints@rtd-denver.com); or visit [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi). Please allow up to three (3) business days for a response.

### 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](mailto:titlevicomplaints@rtd-denver.com); o visite [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi). Por favor, espere hasta tres (3) días hábiles para recibir una respuesta.

### ACCESSIBLE BY CHOICE, NOT BY CHANCE.

In accordance with the Americans with Disabilities Act (ADA), RTD will not discriminate against qualified individuals with disabilities in its services, programs, or activities.

To report any accessibility concerns or complaints, call RTD at **303.299.6000**, or fill out our online comment form at [rtd-denver.com/customer-comments](http://rtd-denver.com/customer-comments).

For more information on RTD's commitment to accessibility, the complaint procedures, or if you would like information in a language other than English or Spanish, or require ASL translation, contact **303.299.6000**; email [ada@rtd-denver.com](mailto:ada@rtd-denver.com); or visit [rtd-denver.com/accessibility](http://rtd-denver.com/accessibility). Please allow up to three (3) business days for a response.

### ACCESIBLE POR ELECCIÓN, NO POR CASUALIDAD.





De acuerdo con la Ley de Estadounidenses con Discapacidades (ADA por sus siglas en inglés), RTD no discriminará a individuos cualificados con discapacidades en sus servicios, programas o actividades.

Para reportar cualquier preocupación o queja sobre la ADA llame a RTD al **303.299.6000**, o rellene nuestro formulario de comentarios en línea [rtd-denver.com/customer-comments](http://rtd-denver.com/customer-comments).

Para obtener más información sobre el compromiso de RTD con la accesibilidad, los procedimientos de reclamación, o si desea información en un idioma que no sea el inglés o el español, o requiere un intérprete de señas, póngase en contacto con el **303.299.6000**; envíe un correo electrónico a [ada@rtd-denver.com](mailto:ada@rtd-denver.com); o visite [rtd-denver.com/accessibility](http://rtd-denver.com/accessibility). Por favor, deje transcurrir tres (3) días hábiles para que la comunicación sea efectiva.

国内公众的民权通知：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 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 2025-2028 Title VI Program

## Title VI Public Notice in Sales Outlets

In 2024, RTD placed the Title VI public notice shown in Figure 4 at three of its sales outlets: Denver Union Station, Civic Center Station, and Downtown Boulder Station. The notice contains the full Title VI statement in English, Spanish, Vietnamese, and Simplified Chinese.

Figure 4. RTD's Title VI Public Notice at Sales Outlets

### RIGHTS OF THE PUBLIC UNDER TITLE VI

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 or the complaint procedures, contact **303.299.6000**; email [titlevi.complaints@rtd-denver.com](mailto:titlevi.complaints@rtd-denver.com); or visit [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi). Please allow up to three (3) business days for a response.

### DERECHOS DEL PÚBLICO BAJO EL TÍTULO VI

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 o los procedimientos de queja, llame al **303.299.6000**; envíe un correo electrónico a [titlevi.complaints@rtd-denver.com](mailto:titlevi.complaints@rtd-denver.com); o visite [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi). Por favor, espere hasta tres (3) días hábiles para recibir una respuesta.

### QUYỀN CỦA CÔNG CHÚNG THEO TIÊU ĐỀ VI

Cơ Quan Vận Tải Khu Vực (Regional Transportation District, RTD) điều hành các chương trình và dịch vụ của mình trên cơ sở không phân biệt chủng tộc, màu da, nguồn gốc quốc gia hoặc bất kỳ đặc điểm nào khác được pháp luật bảo vệ, bao gồm Tiêu Đề VI của Đạo Luật Dân Quyền năm 1964 và Quy Chế Sửa Đổi của Colorado 24-34-601. Nếu quý vị tin là bản thân đã bị nhân viên RTD phân biệt đối xử, quý vị có thể nộp đơn khiếu nại với RTD trong vòng 180 ngày theo lịch sau ngày xảy ra hành vi phân biệt đối xử bị cáo buộc.

Để biết thêm thông tin về các quy định không phân biệt đối xử hoặc thủ tục khiếu nại của RTD, hãy liên hệ theo số **303.299.6000**; email [titlevi.complaints@rtd-denver.com](mailto:titlevi.complaints@rtd-denver.com); hoặc truy cập [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi). Vui lòng đợi tối đa ba (3) ngày làm việc để nhận được phản hồi.

### 第六章规定的公共权利

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（含 1964 年《民权法案》第六章和《科罗拉多州修订法规》24-34-601）保护的任何其他特征。如果您认为自己受到了 RTD 员工的歧视，可以在涉嫌歧视发生之日起 180 个日历日内向 RTD 提出投诉。

如需了解有关 RTD 禁止歧视之规定或投诉程序的详情，请致电 **303.299.6000**；发送电子邮件至 [titlevi.complaints@rtd-denver.com](mailto:titlevi.complaints@rtd-denver.com)；或访问 [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi)。+ 三 (3) 个工作日内回复。



Learn more at [rtd-denver.com/titlevi](http://rtd-denver.com/titlevi)





# RTD 2025-2028 Title VI Program

## Other Civil Rights Information

In 2024, RTD's Civil Rights Division worked with the Communications and Engagement Department to increase visibility of the Civil Rights Division and its various programs (including Title VI) across other agency assets. Specifically, the Communications and Engagement Department added a statement on civil rights and transit equity to shelterboards at stations and stops (Figures 5 and 6) and in bus route and rail line printed schedules (Figures 7 and 8).

## Civil Rights Statement on Shelterboards

Figure 5. An Example Shelterboard Including a Civil Rights Statement (Bottom Left)

**Nine Mile Station**

**Monday-Friday**  
Lunar-Moonrise

**Saturday**  
Sabato

**Sunday/Holiday**  
Domingo/Festivos

**83D/L**  
Cherry Creek  
Parker Road

**121**  
Parker Road

**130**  
Yale/Elgin

**133**  
Hawthorne/Town

**135**  
Dixie Hill Road

**139**  
Dixie Avenue

**AT**  
Aurora Transit

**483**  
Parker Road  
Lunar-Moon

**STANDARD FARES**

Fare Type	Amount
One-Way	\$2.50
Day Pass	\$5.00
7-Day Pass	\$35.00

**DISCOUNT FARES**

Fare Type	Amount
One-Way	\$1.25
Day Pass	\$2.50
7-Day Pass	\$17.50

**RTD MyRide**  
Download the RTD MyRide app to get the latest schedule updates and more.

**RESPECT THE RIDE**  
To ensure a pleasant ride, please be courteous to all passengers and staff.

**CONTACT US**  
303.392.6050 • rtd-denver.com

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# RTD 2025-2028 Title VI Program

Figure 6. A Zoomed-in Version of the Civil Rights Statement on Shelterboards

## Transit for Everyone

RTD is committed to providing a transit system that is equitable, inclusive and accessible for all.

**Scan to learn more about Civil Rights and Language Assistance Services.**

## Civil Rights Statement on Printed Schedules

Figure 7. An Example Printed Schedule Including a Civil Rights Statement (Center)

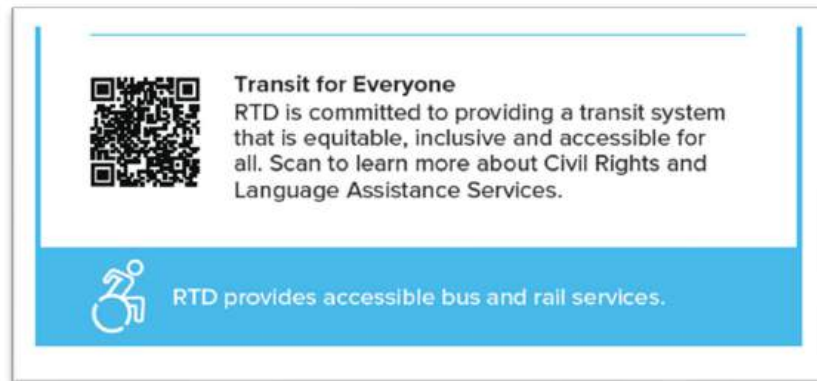
### AB Downtown Boulder Station to Denver Airport

Eastbound En dirección este

Day	1500	1530	1600	1630	1700	1730	1800	1830	1900	1930	2000	2030	2100	2130	2200	2230	2300	2330	2400	2430	2500	2530	2600	2630	2700	2730	2800	2830	2900	2930	3000	3030	3100	3130	3200	3230	3300	3330	3400	3430	3500	3530	3600	3630	3700	3730	3800	3830	3900	3930	4000	4030	4100	4130	4200	4230	4300	4330	4400	4430	4500	4530	4600	4630	4700	4730	4800	4830	4900	4930	5000	5030	5100	5130	5200	5230	5300	5330	5400	5430	5500	5530	5600	5630	5700	5730	5800	5830	5900	5930	6000	6030	6100	6130	6200	6230	6300	6330	6400	6430	6500	6530	6600	6630	6700	6730	6800	6830	6900	6930	7000	7030	7100	7130	7200	7230	7300	7330	7400	7430	7500	7530	7600	7630	7700	7730	7800	7830	7900	7930	8000	8030	8100	8130	8200	8230	8300	8330	8400	8430	8500	8530	8600	8630	8700	8730	8800	8830	8900	8930	9000	9030	9100	9130	9200	9230	9300	9330	9400	9430	9500	9530	9600	9630	9700	9730	9800	9830	9900	9930	10000	10030	10100	10130	10200	10230	10300	10330	10400	10430	10500	10530	10600	10630	10700	10730	10800	10830	10900	10930	11000	11030	11100	11130	11200	11230	11300	11330	11400	11430	11500	11530	11600	11630	11700	11730	11800	11830	11900	11930	12000	12030	12100	12130	12200	12230	12300	12330	12400	12430	12500	12530	12600	12630	12700	12730	12800	12830	12900	12930	13000	13030	13100	13130	13200	13230	13300	13330	13400	13430	13500	13530	13600	13630	13700	13730	13800	13830	13900	13930	14000	14030	14100	14130	14200	14230	14300	14330	14400	14430	14500	14530	14600	14630	14700	14730	14800	14830	14900	14930	15000	15030	15100	15130	15200	15230	15300	15330	15400	15430	15500	15530	15600	15630	15700	15730	15800	15830	15900	15930	16000	16030	16100	16130	16200	16230	16300	16330	16400	16430	16500	16530	16600	16630	16700	16730	16800	16830	16900	16930	17000	17030	17100	17130	17200	17230	17300	17330	17400	17430	17500	17530	17600	17630	17700	17730	17800	17830	17900	17930	18000	18030	18100	18130	18200	18230	18300	18330	18400	18430	18500	18530	18600	18630	18700	18730	18800	18830	18900	18930	19000	19030	19100	19130	19200	19230	19300	19330	19400	19430	19500	19530	19600	19630	19700	19730	19800	19830	19900	19930	20000	20030	20100	20130	20200	20230	20300	20330	20400	20430	20500	20530	20600	20630	20700	20730	20800	20830	20900	20930	21000	21030	21100	21130	21200	21230	21300	21330	21400	21430	21500	21530	21600	21630	21700	21730	21800	21830	21900	21930	22000	22030	22100	22130	22200	22230	22300	22330	22400	22430	22500	22530	22600	22630	22700	22730	22800	22830	22900	22930	23000	23030	23100	23130	23200	23230	23300	23330	23400	23430	23500	23530	23600	23630	23700	23730	23800	23830	23900	23930	24000	24030	24100	24130	24200	24230	24300	24330	24400	24430	24500	24530	24600	24630	24700	24730	24800	24830	24900	24930	25000	25030	25100	25130	25200	25230	25300	25330	25400	25430	25500	25530	25600	25630	25700	25730	25800	25830	25900	25930	26000	26030	26100	26130	26200	26230	26300	26330	26400	26430	26500	26530	26600	26630	26700	26730	26800	26830	26900	26930	27000	27030	27100	27130	27200	27230	27300	27330	27400	27430	27500	27530	27600	27630	27700	27730	27800	27830	27900	27930	28000	28030	28100	28130	28200	28230	28300	28330	28400	28430	28500	28530	28600	28630	28700	28730	28800	28830	28900	28930	29000	29030	29100	29130	29200	29230	29300	29330	29400	29430	29500	29530	29600	29630	29700	29730	29800	29830	29900	29930	30000	30030	30100	30130	30200	30230	30300	30330	30400	30430	30500	30530	30600	30630	30700	30730	30800	30830	30900	30930	31000	31030	31100	31130	31200	31230	31300	31330	31400	31430	31500	31530	31600	31630	31700	31730	31800	31830	31900	31930	32000	32030	32100	32130	32200	32230	32300	32330	32400	32430	32500	32530	32600	32630	32700	32730	32800	32830	32900	32930	33000	33030	33100	33130	33200	33230	33300	33330	33400	33430	33500	33530	33600	33630	33700	33730	33800	33830	33900	33930	34000	34030	34100	34130	34200	34230	34300	34330	34400	34430	34500	34530	34600	34630	34700	34730	34800	34830	34900	34930	35000	35030	35100	35130	35200	35230	35300	35330	35400	35430	35500	35530	35600	35630	35700	35730	35800	35830	35900	35930	36000	36030	36100	36130	36200	36230	36300	36330	36400	36430	36500	36530	36600	36630	36700	36730	36800	36830	36900	36930	37000	37030	37100	37130	37200	37230	37300	37330	37400	37430	37500	37530	37600	37630	37700	37730	37800	37830	37900	37930	38000	38030	38100	38130	38200	38230	38300	38330	38400	38430	38500	38530	38600	38630	38700	38730	38800	38830	38900	38930	39000	39030	39100	39130	39200	39230	39300	39330	39400	39430	39500	39530	39600	39630	39700	39730	39800	39830	39900	39930	40000	40030	40100	40130	40200	40230	40300	40330	40400	40430	40500	40530	40600	40630	40700	40730	40800	40830	40900	40930	41000	41030	41100	41130	41200	41230	41300	41330	41400	41430	41500	41530	41600	41630	41700	41730	41800	41830	41900	41930	42000	42030	42100	42130	42200	42230	42300	42330	42400	42430	42500	42530	42600	42630	42700	42730	42800	42830	42900	42930	43000	43030	43100	43130	43200	43230	43300	43330	43400	43430	43500	43530	43600	43630	43700	43730	43800	43830	43900	43930	44000	44030	44100	44130	44200	44230	44300	44330	44400	44430	44500	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# RTD 2025-2028 Title VI Program

Figure 8. A Zoomed-in Version of the Civil Rights Statement on Printed Schedules



## Title VI and CRS §24-34-601 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 Civil Rights complaint with RTD. CRS §24-34-601 expands these protections to include creed, sex, sexual orientation, gender identity, gender expression, marital status, disability, or ancestry.

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 either in PDF form or [digitally](#), RTD will review the complaint and determine whether the agency has jurisdiction. The customer filing the complaint ("the complainant") will receive an acknowledgement letter informing them if 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, the complainant will have 10 days from the date of the letter to send requested information to the RTD investigator assigned to the case.

Staff adheres to RTD's Transit Equity Nondiscrimination Policy (**Attachment C**) and Transit Equity Nondiscrimination Complaint Management Procedures (**Attachment D**) to ensure a fair, impartial and standardized process for investigating complaints. These procedures outline the roles and responsibilities of all involved parties, specify timelines for investigations and provide step-by-step guidelines for informal and formal complaints. By adhering to these procedures, RTD ensures consistency and thoroughness in investigating and resolving Title VI and CRS §24-34-601 complaints.

During the investigation, the assigned investigator may interview witnesses or other individuals with relevant information. If additional details are needed, the complainant or witnesses may be contacted. Failure to respond within the required timeframe may result in the administrative closure of the case. Cases may also be closed if the complainant chooses to no longer pursue the matter.

RTD will generally complete an investigation within 60 days from receipt of a completed complaint form. Although RTD strives to resolve complaints quickly, resolution time may vary depending on factors such as the complexity of the complaint and the individuals involved. Once the investigation is complete, RTD will send a final written response to the complainant by mail, email, or fax.



# RTD 2025-2028 Title VI Program

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 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 10 days. In cases where consideration is granted, the Transit Equity Manager will issue a determination letter to the complainant upon completion of the reconsideration review.

## List of Title VI Investigations, Complaints, and Lawsuits

As a recipient of federal funding, RTD is required to accept, log, and investigate complaints alleging discrimination under Title VI. Over the past three years, these complaints have decreased by 24.5%, decreasing from 106 in 2019-2022 to 80 in 2022-2025. A detailed breakdown of these complaints and their outcomes is provided in Figure 9.

### Investigations

During the reporting period, the State of Colorado Civil Rights Division initiated two investigations into complaints/charges of alleged discrimination under the Colorado Anti-Discrimination Act. Both complaints pertain to transit-related contractors, but RTD is listed as the respondent. One has been settled and formally closed while the other has resulted in a no probable cause determination yet remains to be formally closed.

### Lawsuits

No lawsuits were filed during the reporting period.

### Complaints

RTD staff received, investigated, and resolved submitted complaints in accordance with RTD's Transit Equity Nondiscrimination Policy. Figure 9 provides an overview of the Title VI-related complaints received during the reporting period, with each complaint categorized based on the investigation's findings.

- Probable Cause: The investigation determined that the incident occurred and was related to a Title VI-protected class
- No Violation Found: The investigation found no violation or determined that the alleged event did not take place
- No Probable Cause Found: The investigation found that the incident occurred but was not related to a Title VI-protected class
- Administrative Closure: Cases closed prior to reaching a resolution based on established FTA circumstances

## Trainings to Enhance Service Delivery and Compliance

To further enhance customer interactions and ensure fair, respectful service for all transit customers, the Transit Equity Office has implemented two training programs focused on civil rights compliance and equitable service delivery: Civil Rights and Public Accommodations and Serving Non-English-Speaking Customers.

The Civil Rights and Public Accommodations training educates frontline staff on Title VI protections, RTD's nondiscrimination policies, and legal responsibilities. It defines discrimination and harassment while covering Title VI and CRS 24-34-601 protected classes. The Serving Non-English-Speaking Customers training equips staff to assist linguistically diverse customers. It describes Title VI protections for linguistically diverse populations, highlights cross-cultural verbal and nonverbal communication strategies, and demonstrates the tools and techniques available to communicate across language barriers.

# RTD 2025-2028 Title VI Program

By equipping frontline staff with a deeper understanding of civil rights protections and language access, RTD has improved service delivery and reduced incidents of perceived or actual discrimination, contributing to a 29% decrease in complaints from the 2022-2025 program period. The *Civil Rights and Public Accommodations* training reinforces RTD's commitment to nondiscrimination, while the *Serving Non-English-Speaking Customers* training has helped address concerns related to communication barriers. Together, these trainings have fostered a more welcoming transit environment and strengthened RTD's compliance with federal and state civil rights regulations.

Figure 9. List of Title VI Complaints Received by RTD Since Last Program Submittal

Date Filed	Title VI Basis	Status	Outcome
May 14, 2022	Race	Closed	No Violation Found
May 16, 2022	Race	Closed	No Probable Cause Found
May 18, 2022	Race	Closed	No Violation Found
June 1, 2022	Race	Closed	No Violation Found
June 6, 2022	Race	Closed	No Probable Cause Found
June 7, 2022	Race	Closed	No Probable Cause Found
June 14, 2022	National Origin	Closed	Probable Cause
June 16, 2022	Race	Closed	Probable Cause
June 18, 2022	National Origin	Closed	No Violation Found
June 20, 2022	Race	Closed	No Violation Found
July 14, 2022	Race	Closed	No Violation Found
July 14, 2022	Race	Closed	No Violation Found
July 16, 2022	Race	Closed	No Probable Cause Found
July 24, 2022	Race	Closed	No Violation Found
July 28, 2022	Race	Closed	No Violation Found
August 12, 2022	Race	Closed	No Violation Found
August 31, 2022	Race	Closed	No Violation Found
September 1, 2022	Race	Closed	No Probable Cause Found
September 7, 2022	Race	Closed	No Probable Cause Found
September 15, 2022	Race	Closed	No Probable Cause Found
September 21, 2022	Race	Closed	No Probable Cause Found
September 22, 2022	Race	Closed	No Violation Found
October 6, 2022	Race	Closed	No Probable Cause Found
October 10, 2022	Race	Closed	No Probable Cause Found
October 17, 2022	Race	Closed	No Violation Found
October 17, 2022	Race	Closed	No Violation Found
November 5, 2022	Race	Closed	Administrative Closure
November 15, 2022	Race	Closed	No Probable Cause Found
January 20, 2023	Race	Closed	No Probable Cause Found
January 28, 2023	Race	Closed	No Probable Cause Found
February 1, 2023	Race	Closed	No Violation Found

# RTD 2025-2028 Title VI Program

February 11, 2023	Race	Closed	Probable Cause
February 13, 2023	Race	Closed	No Violation Found
March 1, 2023	Race	Closed	No Violation Found
March 14, 2023	Race	Closed	No Violation Found
April 27, 2023	Race	Closed	No Violation Found
May 1, 2023	Race	Closed	No Violation Found
May 2, 2023	Race	Closed	No Probable Cause Found
May 3, 2023	Race	Closed	No Violation Found
June 20, 2023	Race	Closed	No Violation Found
July 21, 2023	Race	Closed	No Violation Found
July 29, 2023	Race	Closed	No Violation Found
August 7, 2023	Race	Closed	No Probable Cause Found
August 24, 2023	Race	Closed	No Violation Found
September 22, 2023	Race	Closed	No Violation Found
September 28, 2023	Race	Closed	No Violation Found
October 4, 2023	Race	Closed	No Violation Found
October 9, 2023	Race	Closed	No Probable Cause Found
October 13, 2023	Race	Closed	No Violation Found
October 29, 2023	Race	Closed	No Violation Found
November 13, 2023	Race	Closed	No Violation Found
November 28, 2023	Race	Closed	No Violation Found
December 4, 2023	National Origin	Closed	No Violation Found
December 12, 2023	Race	Closed	Probable Cause
January 5, 2024	Race	Closed	No Violation Found
January 25, 2024	Race	Closed	No Violation Found
February 6, 2024	Race	Closed	No Violation Found
February 23, 2024	Race	Closed	No Violation Found
June 3, 2024	Race	Closed	No Violation Found
June 13, 2024	Race	Closed	No Violation Found
July 15, 2024	National Origin	Closed	Probable Cause
July 29, 2024	Race	Closed	No Violation Found
August 2, 2024	Discrimination	Closed	No Probable Cause Found
August 14, 2024	Race	Closed	No Probable Cause Found
September 10, 2024	Race	Closed	Administrative Closure
October 2, 2024	National Origin	Closed	No Violation Found
October 17, 2024	Race	Closed	No Violation Found
November 5, 2024	Race	Closed	No Probable Cause Found
November 10, 2024	Race	Closed	No Probable Cause Found
November 19, 2024	Race	Closed	No Violation Found

# RTD 2025-2028 Title VI Program

December 18, 2024	National Origin	Closed	No Probable Cause Found
December 24, 2024	Race	Closed	No Probable Cause Found
December 27, 2024	Race	Closed	No Violation Found
January 6, 2025	National Origin	Closed	Probable Cause
January 9, 2025	National Origin	Closed	No Probable Cause Found
January 22, 2025	Race	Closed	No Probable Cause Found
February 2, 2025	National Origin	Closed	Probable Cause
February 21, 2025	Race	Closed	No Probable Cause Found
March 3, 2025	Race	Closed	No Probable Cause Found
March 9, 2025	Race	Closed	No Probable Cause Found

## Public Participation Plan: Overview

RTD is committed to an inclusive public participation process that actively engages BIPOC, low-income, and linguistically diverse communities. RTD's Communications and Engagement Department, in partnership with the Civil Rights Division, the Planning Department, the Board Office, and other departments, has updated the agency's Public Participation Plan (PPP) (**Attachment E**) with this submission to summarize the agency's recent outreach efforts and current approach to public participation as well as to reflect ongoing efforts to enhance equitable engagement. The plan also outlines RTD's strategy for recruitment and fostering diverse membership on its non-elected advisory committees as well as the demographics of RTD's three advisory committees: the Advisory Committee for People with Disabilities (ACPD), Access-a-Ride Paratransit Advisory Committee (APAC), and the Citizens Advisory Committee (CAC).

## Language Access Plan: Overview

Ensuring linguistically diverse communities have meaningful access to RTD's transit programs, services, and activities is a high priority for RTD. Following a comprehensive review of linguistically diverse populations within its service area by way of the Four Factor Analysis, RTD has updated its 2025-2028 Language Access Plan to maintain successful current language access measures and identify new strategies to further enhance language accessibility. This plan serves as the backbone for [RTD's Language Access Program](#) and is included in **Attachment F**.

## Subrecipient Monitoring

### General Requirements

RTD's subrecipients of federal financial assistance must comply with Title VI of the Civil Rights Act of 1964 by following the guidance of FTA Circular 4702.1B. RTD's Transit Equity Office monitors subrecipients, certifying enforcement of Title VI by overseeing the following actions:

- Title VI Policy Statement: Subrecipients must annually submit a signed Title VI Policy Statement confirming compliance with FTA Circular 4702.1B recordkeeping requirements
- Notice of Rights under Title VI: Subrecipients must prominently display their Title VI public notice in accessible locations at their facilities

# RTD 2025-2028 Title VI Program

- Complaint Process and List: Subrecipients must implement a Title VI complaint process and provide RTD with a list of active lawsuits and a summary of complaints alleging discrimination based on race, color, or national origin
- Public Participation: Subrecipients should maintain a public participation plan (PPP) that offers early and ongoing opportunities for public involvement in identifying the social, economic, and environmental impacts of transportation decisions. Efforts to engage BIPOC and low-income communities should include both broad measures, such as public notices at stations and vehicles, and specific actions to address barriers like language, culture, or economic challenges
- Language Access: Subrecipients must ensure meaningful access to programs and services for linguistically diverse individuals by providing a copy of its Language Access Plan (LAP)
- Inclusive Advisory and Planning Boards: Subrecipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies must detail the racial composition of committee members and efforts to encourage BIPOC participation in them
- 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, or other facility, the subrecipient should include a copy of the Title VI facility siting equity analysis conducted during the planning stage

Each subrecipient further agrees to 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 Code of Federal Regulations (CFR) 21.5(b)(2), 49 CFR 21.5(b)(7), and 49 CFR Part 21, Appendix C.

RTD encourages subrecipients to adopt the agency's own notice to beneficiaries, complaint procedures, and complaint forms, PPP, and LAP where appropriate. To assist subrecipients in understanding their Title VI requirements, the Transit Equity Office provides the Subrecipient Title VI Compliance Guide found in **Attachment G**.

## Smart Commute Metro North

RTD's only subrecipient during the 2022-2025 Title VI Program was Smart Commute Metro North, with a contract effective from November 11, 2019 through September 31, 2023. [Smart Commute Metro North](#) is a 501(c)(3) non-profit and transportation management organization that supported provision of transit services to the northern portion of RTD's service area. RTD's concurrence letter with Smart Commute Metro North's Title VI documentation is found in **Attachment H**, and the non-profit's most recently signed Title VI Policy Statement is found in **Attachment I**.

## Transit-related Contractors

In addition to RTD subrecipients, every RTD transit-related contractor ("contractor") must adhere to Title VI nondiscrimination requirements. Currently, RTD partners with four primary contractors who provide essential services to the agency:

- Allied Universal: Security services
- Denver Transit Partners (DTP): Commuter rail service delivery and maintenance services
- Transdev: Fixed-route bus service delivery
- MTM Transit: Paratransit trip scheduling and customer eligibility assessment

## *Actions Taken to Ensure Contractor Compliance*

To ensure that all contractors understand and comply with Title VI requirements, RTD has taken the following steps:

# RTD 2025-2028 Title VI Program

- Met with Contractors: The Transit Equity Office, along with the Americans with Disabilities Act Office, met with all contractors from October 23 to December 22, 2023 to discuss Title VI requirements, address questions, and clarify expectations. During these sessions, RTD established clear deliverables and requested that contractors provide documentation of their compliance with Title VI requirements. Following the meetings, RTD issued a formal memorandum to all contractors, reiterating their Title VI obligations, as well as a detailed slide deck covering RTD's nondiscrimination policy, procedures for handling and reporting allegations of discrimination, language access requirements, and monitoring and reporting expectations.
- Reviewed Documentation and Provided Concurrence: The Transit Equity Manager reviewed all documentation submitted by contractors to ensure that it met the expectations outlined in the FTA Circular. Following this review, the manager issued a concurrence letter confirming that the contractors are abiding by Title VI requirements. Please find the concurrence letters in **Attachments J-M**.
- Established Contractor Trainings: Following this review, contractors adopted training programs to educate their staff on Title VI requirements. These include the Civil Rights and Public Accommodations training and the Serving Non-English Speaking Customers training described in the *List of Title VI Investigations, Complaints, and Lawsuits* section above.

## Ongoing Monitoring and Oversight

RTD is committed to maintaining robust oversight of contractor compliance with Title VI. The following measures are in place to ensure ongoing adherence:

- Contractual Assurances: All contracts include a Title VI assurance clause, requiring contractors to comply with nondiscrimination requirements and cooperate with RTD's monitoring efforts.
- Periodic Reviews: RTD conducts periodic reviews of contractor activities to ensure compliance with Title VI and FTA Circular requirements. These reviews assess language access measures and complaint handling procedures, ensuring that all protocols are followed and issues promptly addressed.
- Complaint Procedures: Contractors are required to report any Title VI-related complaints to RTD and cooperate fully in the investigation and resolution of such complaints.

RTD's proactive approach to contractor compliance with Title VI demonstrates the agency's commitment to ensuring equitable access to transit services for all individuals. By engaging contractors, providing clear guidance, and maintaining oversight, RTD ensures that its federally assisted programs and activities are free from discrimination and accessible to all members of the community.

## Equity Analysis for Facilities Siting and Construction

### Siting Facility Statement

RTD is committed to equitable, accessible, and nondiscriminatory site selection for all transit facilities, ensuring compliance with Title VI and related federal regulations. This process prevents discrimination, provides the opportunity to mitigate potential adverse impacts, and prohibits site selection decisions that exclude, deny benefits, or disproportionately burden populations based on race, color, or national origin.

RTD upholds this commitment through rigorous equity analyses, proactive community engagement, and mitigation strategies that promote fairness, transparency, and accessibility.



# RTD 2025-2028 Title VI Program

## Facility Siting Framework

RTD's Facility Siting Framework establishes a structured approach to ensure equitable site selection. The following key components guide the process:

- **Equitable Siting:** RTD will comply with Title 49 CFR Section 21.5(b)(3), ensuring no site selection excludes, denies benefits to, or disproportionately burdens individuals based on race, color, or national origin. Using census block group data, RTD will assess demographic impacts and cumulative effects of existing transit facilities to ensure that proper perspective is given to localized impacts.
- **Public Engagement:** RTD will conduct proactive outreach, including public meetings, surveys, and focus groups. Materials will be provided in multiple languages and accessible formats. Engagement will occur at multiple stages and before site selection, to ensure inclusivity and transparency, aligning with FTA Circular 4702.1B.
- **Equity Analysis:** Before selecting a site, RTD will evaluate equity impacts, including potential displacement and cumulative effects of similar facilities. The analysis will focus on BIPOC and will consider low-income populations within a quarter-mile radius. Findings will be publicly shared to enhance transparency and guide decision-making.
- **Adverse Impact Mitigation:** If a disparate impact on BIPOC populations is identified, RTD will collaborate with affected communities to develop mitigation strategies such as relocation assistance or job training. Sites with a disparate impact will only be chosen if no feasible alternatives exist, and RTD will provide clear justification in accordance with Title 49 CFR Section 21.5(b)(3).
- **Compliance and Reporting:** RTD will adhere to federal, state, and local regulations, ensuring compliance with Title VI requirements. Triennial reports will document public engagement, equity analyses, and mitigation efforts, demonstrating RTD's commitment to fair and equitable site selection.

## Standard Process for Facility Siting and Construction

Figure 10. RTD's Process for Incorporating Equity Analyses into Facility Siting and Construction

<b>1</b> <b>Planning and Preliminary Site Identification</b>	<ul style="list-style-type: none"><li>• Identify potential locations based on RTD's operational needs and long-term goals</li><li>• Perform Level 1 screening to eliminate sites with critical issues, including:<ul style="list-style-type: none"><li>◦ Zoning restrictions prohibiting transit facilities</li><li>◦ Environmental hazards (e.g., flood zones, contamination risks)</li><li>◦ Inadequate parcel size for operational needs</li><li>◦ Proximity to sensitive land uses (e.g., schools, residential areas)</li></ul></li><li>• Conduct a preliminary demographic analysis using census block group data to assess potential impacts on BIPOC and low-income communities, ensuring compliance with Title 49 CFR Section 21.5(b)(3)</li></ul>
<b>2</b> <b>Alternatives Analysis and Site Shortlisting</b>	<ul style="list-style-type: none"><li>• Evaluate a short list of siting alternatives (including a no-build alternative), as required by FTA Circular 4702.1B</li><li>• Use a tiered evaluation system to screen and rank sites:<ul style="list-style-type: none"><li>◦ Tier A (Critical Factors): Location, bus operating cost/deadhead impacts, road access, zoning compatibility, and equity considerations</li><li>◦ Tier B (Infrastructure Feasibility): Utility access, parcel ownership, acquisition costs, and development feasibility</li><li>◦ Tier C (Environmental Considerations): Noise, air quality, traffic impact, historic preservation, wetlands, and floodplain risks</li></ul></li><li>• Conduct an Alternatives Analysis based on:</li></ul>

# RTD 2025-2028 Title VI Program

	<ul style="list-style-type: none"> <li>○ Equity factors: Demographics, displacement risks, and cumulative impacts</li> <li>○ Operational feasibility: Accessibility, utility availability, and road connectivity</li> <li>○ Environmental considerations: Impact on surrounding land use and sustainability</li> <li>• Eliminate discriminatory or high-impact sites, ensuring the final shortlist represents the least discriminatory alternatives</li> </ul>
<b>3</b> <b>Public Involvement</b>	<ul style="list-style-type: none"> <li>• Conduct early and ongoing engagement with affected communities before final site selection</li> <li>• Gather input through public meetings, surveys, focus groups, and direct outreach</li> <li>• Provide accessible, multilingual, and culturally appropriate materials, in alignment with FTA Circular 4702.1B</li> <li>• Engage historically underserved populations, including BIPOC, low-income, and linguistically diverse communities, ensuring transparency and inclusivity</li> <li>• Document community concerns and integrate feedback into the alternatives analysis and site selection process</li> </ul>
<b>4</b> <b>Equity Analysis and Site Selection</b>	<ul style="list-style-type: none"> <li>• Perform Level 2 screening of shortlisted sites to assess: <ul style="list-style-type: none"> <li>○ Environmental, cultural, and zoning constraints</li> <li>○ Title VI impacts within a quarter-mile radius, focusing on BIPOC and considering low-income communities</li> <li>○ Potential displacement of residents or businesses</li> <li>○ Cumulative effects of existing transit facilities to prevent overburdening historically underserved communities</li> </ul> </li> <li>• Complete a Title VI Facility Siting Equity Analysis before selecting a preferred site: <ul style="list-style-type: none"> <li>○ Compare potential disparate impacts on to ensure the location with the least impact is chosen</li> <li>○ If a site creates a disparate impact, RTD must: <ul style="list-style-type: none"> <li>▪ Demonstrate a substantial legitimate justification for its necessity</li> <li>▪ Show that no feasible alternative exists with a less disparate impact</li> <li>▪ Develop and implement mitigation strategies (e.g., relocation assistance, community benefits, environmental safeguards)</li> </ul> </li> </ul> </li> <li>• Present Title VI Facility Siting Equity Analysis to the RTD Board of Directors for consideration, awareness, and approval</li> <li>• Finalize the preferred site, ensuring compliance with Title VI before proceeding with implementation</li> </ul>
<b>5</b> <b>Implementation and Post-Siting Monitoring</b>	<ul style="list-style-type: none"> <li>• Consider mitigation strategies in consultation with impacted communities, including relocation assistance, job training, and environmental safeguards</li> <li>• Monitor compliance throughout construction and operation to prevent unintended discriminatory impacts</li> <li>• Maintain ongoing community engagement and document outcomes in triennial Title VI compliance reports</li> </ul>

# RTD 2025-2028 Title VI Program

## Requirements for Fixed-Route Transit Providers

In addition to the general requirements for FTA recipients outlined above, FTA Circular 4702.1B, Chapter VI, imposes additional obligations on fixed-route service providers that operate 50 or more vehicles in peak service and are in urbanized areas with populations of 200,000 or more. These requirements include:

1. Title VI Policies
2. Service Performance Monitoring
3. Equity Analyses of Major Service and Fare Changes since the 2022 Submission
4. Demographic Analysis

Since RTD meets this threshold, the following section explains how the agency fulfills these requirements.

## Title VI 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 and fare change proposals for equity.

In the 2025-2028 Title VI Program, RTD revised the major service change policy, the fare equity policy, and the definition of who constitutes the “low-income” population as it pertains to the disproportionate burden policy. In the development of these policies, RTD sought public feedback through a series of public meetings and surveys described below in *Engagement Efforts on Title VI Policy Changes*. The disparate impact policy, disproportionate burden policy, and Key Activity Centers (formerly known as Key Public Service Destinations) Assessment remain the same in the 2025-2028 Title VI Program as the previous iteration.

These policies and their applicable thresholds are listed below.

## Changes from the 2022-2025 Title VI Policies

In the 2025-2028 Title VI Program, RTD revised the major service change policy, the fare equity policy, and the definition of who constitutes the “low-income” population as it pertains to the disproportionate burden policy.

To inform the major service change policy, RTD examined the major service change policies of 22 different transit agencies: Alameda-Contra Costa Transit District (AC Transit), Albuquerque Transit Department (ABQRIDE), Bay Area Rapid Transit (BART), Chicago Transit Authority (CTA), Dallas Area Rapid Transit (DART), Des Moines Area Regional Transit Authority (DART), King County Metro, LA Metro, Milwaukee County Transit System (MCTS), Metropolitan Atlanta Rapid Transit Authority (MARTA), Metropolitan Council Metro Transit (MSP Metro), North County Transit District (NCTD), Pierce Transit, Sacramento Regional Transit District, San Diego Metropolitan Transit System (MTS), San Francisco Municipal Transportation Agency (SFMTA), San Mateo County Transit District (SamTrans), Sound Transit, SunTran, Tri-County Metropolitan Transportation District of Oregon (TriMet), Utah Transit Authority (UTA), and Washington Metropolitan Area Transit Authority (WMATA).

The new major service change policy maintains a 25% threshold, as this is the most common standard across the researched agencies. However, the criteria for what constitutes a major service change under the policy now expands beyond service hours alone to specify that 25% changes in service hours, route miles (including re-routes), daily service span, or frequency; implementation of a new route or line; and the elimination, discontinuation, or retirement of an existing route/line all constitute major service changes. Additionally, the previous major service change policy required that a change be enacted for 12 months or more to constitute a major service change; the new policy removes this requirement to capture 25% changes made at one time or cumulatively over a 36-month period. This helps RTD ensure that small changes made over time do not add up to large changes that unequally impact communities.

# RTD 2025-2028 Title VI Program

Separately, changes made to the fare equity policy aim to clarify when a fare equity analysis is required, ensuring that fare changes do not disproportionately affect BIPOC and low-income communities.

Finally, RTD updated its disproportionate burden policy, raising the threshold from 150% to 200% of the Department of Health and Human Services Poverty Guidelines. This change better reflects the cost of living in the Denver metro region, aligns more closely with the LiVE Income-Based Discount Program and the financial realities of low-income customers, and ensures a more accurate analysis of transit service distribution. While a 250% threshold was considered, limitations in the U.S. Census Bureau's ACS 2019-2023 data made precise analysis beyond 200% difficult. The next available income grouping in the ACS dataset is 200-300%, preventing an accurate assessment of a 250% threshold's impact. In the end, expanding the threshold also broadens the number of low-income individuals included in RTD's equity analyses, improving the ability to identify and address potential transit access disparities.

In the development of these policies, RTD also sought public feedback through a series of public meetings and surveys described below in *Engagement Efforts on Title VI Policy Changes*. The disparate impact policy and Key Activity Centers (formerly known as Key Public Service Destinations) Assessment remain the same in the 2025-2028 Title VI Program as the previous iteration.

All policies and their applicable thresholds are described in full below.

## Service Equity Analyses

Prior to implementation, the FTA requires RTD to conduct a Service Equity Analysis on all service changes that exceed the agency's self-established major service change threshold to determine whether those changes will have adverse effects on BIPOC or low-income populations. RTD defines "**adverse effect**" as any impact on transit services resulting from major service changes, such as service reductions, route modifications, schedule adjustments, or other modifications, that may:

- Disproportionately burden BIPOC and/or low-income populations compared to non-BIPOC and/or non-low-income populations, or
- Disproportionately benefit non-BIPOC and/or non-low-income populations as compared to BIPOC and/or low-income populations

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*RTD's previous Title VI Program defined an adverse effect 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."*

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## Major Service Change Policy

To assist in analyzing the degree of adverse effects, RTD defines a **major service change** as:

- A 25% or greater change in service hours, route miles (including re-routes), daily service span, or frequency of any bus route or rail line within a single service proposal or cumulatively in any period within 36 consecutive months<sup>2</sup>
- The implementation of a new route/line

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<sup>2</sup> The cumulative 36-month period begins when the very first change to a route/line is made.

# RTD 2025-2028 Title VI Program

- The elimination, discontinuation, or retirement of an existing route/line

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*RTD's previous Title VI Program defined a major service change as "a 25% addition or reduction in the service hours of any route that would remain in effect for 12 or more months."*

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Any service change that does not meet the above criteria for a major service change is considered a **minor service change**. Additionally, the following exceptional cases are exempt:

- Discontinuance of service that is replaced by a different mode or operator, provided the new service offers the same or better headways, fare, transfer options, span of service, and stops served
- Standard seasonal or schedule adjustments, unless the adjustments, as compared to operations during the previous season, falls within the major service change definition above
- Emergency service changes, including changes in routes or service frequencies which may be necessitated due to a state of fiscal emergency or a major catastrophe (e.g., natural or human-made disasters) which severely impairs public health or safety, changes in access to public streets, or the ability of RTD vehicles to travel on public streets
- Service changes (e.g., detours) due to roadway or rail infrastructural projects undertaken by external stakeholders (e.g., the Colorado Department of Transportation, City and County of Denver) that would remain in effect for 12 months or less
- Creation, alteration, or elimination of a supplemental, temporary, or demonstration service that would remain in effect for 12 months or less
- Adjustments made to major service changes after Board approval but prior to the effective date that would otherwise be considered minor changes

## ***Examining Adverse Effects: Disparate Impact, Disproportionate Burden, and Key Activities Centers***

A Service Equity Analysis is conducted for all major service changes and presented to the RTD Board of Directors for awareness and consideration. The analysis, along with a record of the Board's actions, will be included in the subsequent RTD Title VI Program.

To perform a Service Equity Analysis examining adverse effects, RTD will analyze how the proposed major service change(s) could impact BIPOC populations as compared to non-BIPOC populations, and low-income populations as compared to non-low-income populations, at both the route/line level and the network level. Specifically, a major service change should not adversely affect BIPOC populations 10% more than non-BIPOC populations; this level of impact is considered a **disparate impact**. A major service change should not adversely affect low-income populations 10% 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 200% of the Department of Health and Human Services (HHS) Poverty Guidelines.

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*RTD's previous Title VI Program defined low-income populations as those whose household income is at or below 150% of the HHS Poverty Guidelines.*

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# RTD 2025-2028 Title VI Program

First, RTD identifies the service changes which meet the threshold established in the major service change policy.<sup>3</sup> The next step in the analysis is to look at each service change at the route/line level to identify potential individual disparate impact or disproportionate burden findings. If there is a finding, and in accordance with RTD's 2022-2025 Title VI Program, a network-level analysis is required to further clarify how service changes may impact Title VI-protected populations at aggregate levels.<sup>4</sup> Additionally, RTD will quantify the service changes' impacts to **key activity centers** access, which include jobs, retail/convenience stores, human and social service centers, senior facilities, and educational institutions.

If a proposed major service change results in a disparate impact, RTD shall consider modifications to the proposed change to ensure it avoids, minimizes, or mitigates the potential disparate impact. A major service change that results in a disparate impact can only be implemented if:

1. There is a substantial legitimate justification for the proposed major service change, and
2. There are no alternatives that would have a less disparate impact while still accomplishing RTD's legitimate program goals

If a proposed major service change results in a disproportionate burden, RTD will consider modifying the proposal to mitigate the impact where practicable.<sup>5</sup>

## Fare Equity Analyses

Like the Service Equity Analyses, FTA Circular 4702.1B requires that RTD conduct a Fare Equity Analysis when proposing fare changes to assess whether the proposed changes adversely impact BIPOC and low-income populations. RTD must establish a fare disparate impact threshold to determine when fare changes disproportionately affect BIPOC customers and a fare disproportionate burden threshold for low-income customers.

Per the FTA, a Fare Equity Analysis is not required in the following cases:

- Temporary fare reductions. If the fare change is a short-term promotional fare reduction, such as free rides during a special event or seasonal discount programs
- Emergency fare changes. If a fare change is implemented during an emergency, such as a natural disaster or a public health crisis, and is intended to address immediate needs
- Minor fare adjustments. Changes that do not affect the fare structure or pricing for a specific group (e.g., minor rounding adjustments)
- Special event or promotional zero-fare programs. For RTD, this includes fare-free days such as Zero Fare for Transit Equity Day, Zero Fare for National Vote Early Day and Election Day, or Zero Fare for New Year's Eve

## Fare Equity Policy

Any RTD fare change should not result in BIPOC or low-income customers experiencing impacts that differ by more than 5% compared to general ridership. If changes involve the addition or removal of fare media, the equity analysis must consider access to fare media, vending machines, and other ways to add value (e.g., online or through retail).

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<sup>3</sup> Please refer to the attached Service Equity Analyses for an explanation of this methodology.

<sup>4</sup> Ibid.

<sup>5</sup> Per the FTA, low-income populations are not a protected class under Title VI. However, the FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes. Since low-income populations are not a protected class under Title VI, RTD's approach to disparate impacts identified in major service changes differs from that of disproportionate burden findings.



# RTD 2025-2028 Title VI Program

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*RTD's previous Title VI Program did not clearly define what constitutes a "fare change."*

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As part of this updated Title VI Program, RTD defines a "fare change" to include:

- Increases or decreases in the price of fare media
- New or discontinued fare media (i.e., types of transit payment like cash, paper pass or electronic)
- Changes in fare types or products (e.g., Day Pass, Monthly Pass), fare levels (e.g., Standard, Airport), and customer categories (e.g., full-fare, seniors, individuals with disabilities, Medicare recipients, LiVE program participants, and youth ages 19 and under)
- Modifications to Ticket Vending Machine access (e.g., quantity, fees, payment options)

This definition excludes Access-a-Ride services, which are not subject to these Title VI requirements.

## ***Fare Disparate Impact or Disproportionate Burden Policies***

If a fare change affects BIPOC populations five percent more than non-BIPOC populations, this level of impact is considered a **disparate impact**. If a fare change affects low-income populations five percent more than non-low-income populations; this level of impact is considered a **disproportionate burden**. If a proposed fare change results in a disparate impact, RTD shall consider modifications to the proposed change to ensure it avoids, minimizes, or mitigates the potential disparate impact. RTD can only implement a fare change resulting in a disparate impact if:

1. There is a substantial legitimate justification for the proposed fare change, and
2. There are no alternatives that would have a less disparate impact while still accomplishing RTD's legitimate program goals

If a proposed fare change results in a disproportionate burden on low-income populations, RTD will consider modifying the proposal to mitigate the impact where practicable.

## **Equity Analyses of Major Service and Fare Changes Since 2022 Submission**

All Service and Fare Equity Analyses conducted since the last Title VI Program update are located in **Attachments N-V**.

## **Service Performance Monitoring**

Per FTA Circular 4702.1B, Chapter VI, RTD must establish service standards and actively monitor agency service to ensure equitable and consistent delivery. These standards provide a framework for objective decision-making in service provision. Additionally, the FTA expects transit agencies to regularly evaluate their services to ensure they are provided fairly and without discrimination.

To comply with this requirement, RTD produces its Service Performance Monitoring Report on an annual basis. The report compares BIPOC access to that of non-BIPOC access as well as low-income access to that of non-low-income access across six service performance metrics: stop amenities, vehicle loads, revenue hours, on-time performance, vehicle assignment, and service availability. The metrics are defined as follows:

# RTD 2025-2028 Title VI Program

- Stop amenities: RTD analyzes the distribution of stop amenities in the RTD system (specifically, shelters; seating; lighting; elevators; digital displays; signs, maps, and/or schedules; waste receptacles; and ticket vending machines) to identify any potential disparities
- Vehicle loads: RTD evaluates whether weekday local bus, regional bus, SkyRide, Bus Rapid Transit, light rail vehicles, and commuter rail vehicles are overcrowded by comparing the load/seat factor for each vehicle type and time period (i.e., peak and midday)
- Revenue hours: RTD evaluates the amount and distribution of revenue hours of service provided in census block groups. The hours while in service include trip start to finish
- On-time performance: RTD defines “on-time” as no more than one minute early or five minutes late, measured at time points
- Vehicle assignment: The FTA expects that the average age of vehicles on BIPOC and/or low-income lines/routes should be no more than the average age of vehicles on non-BIPOC and/or non-low-income lines/routes
- Service availability: RTD considers people 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

The target for RTD’s 2021-2026 Strategic Plan is for BIPOC and low-income routes and lines to achieve within 10% or better per service performance metric. A metric above the 10% threshold but within 20% would result in a “marginal” score. A marginal score would flag that metric as a caution and area for improvement. Any composite score that exceeds 20% for BIPOC populations would indicate “adverse impact” and would result in a system-wide disparate impact finding per the FTA.

Detailed findings are available in the 2022 Service Performance Monitoring Report (**Attachment W**), and the Transit Service Policies and Standards (**Attachment X**).

## Demographic Analysis

RTD leverages demographic data to evaluate equity in the distribution of services, facilities, and amenities, ensuring meaningful access for BIPOC, low-income, and linguistically diverse populations. This data informs decision-making at the earliest stages of planning for services, facilities, and programs while also enabling RTD to continuously monitor service performance. By analyzing the impacts of policies and programs on these communities, RTD identifies and implements measures to prevent or mitigate disparities. To support this analysis, RTD develops GIS maps and comparative charts, integrating both ridership and population data across its service area.

## Current Network and Service Area

Figures 11 to 13 illustrate the distribution of BIPOC, low-income, and linguistically diverse populations in relation to services throughout the RTD service area. These maps, derived from the 2019-2023 American Community Survey (ACS) data, provide insight into transit access for these populations.

Figure 11 depicts the RTD network in relation to the distribution of BIPOC populations by census block group. Areas are shaded to indicate block groups where the BIPOC population is greater than or equal to the RTD service area average (38.2%), as reported in the 2019-2023 ACS.

Figure 12 illustrates the RTD network in relation to low-income populations by census block group. Low-income is defined as earning 150% or less of the Department of Health and Human Services (HHS) federal poverty level. Areas are shaded to indicate block groups where the low-income population meets or exceeds the RTD service area average (14.1%), based on the 2019-2023 ACS. High concentrations of low-income households are dispersed throughout the service area.

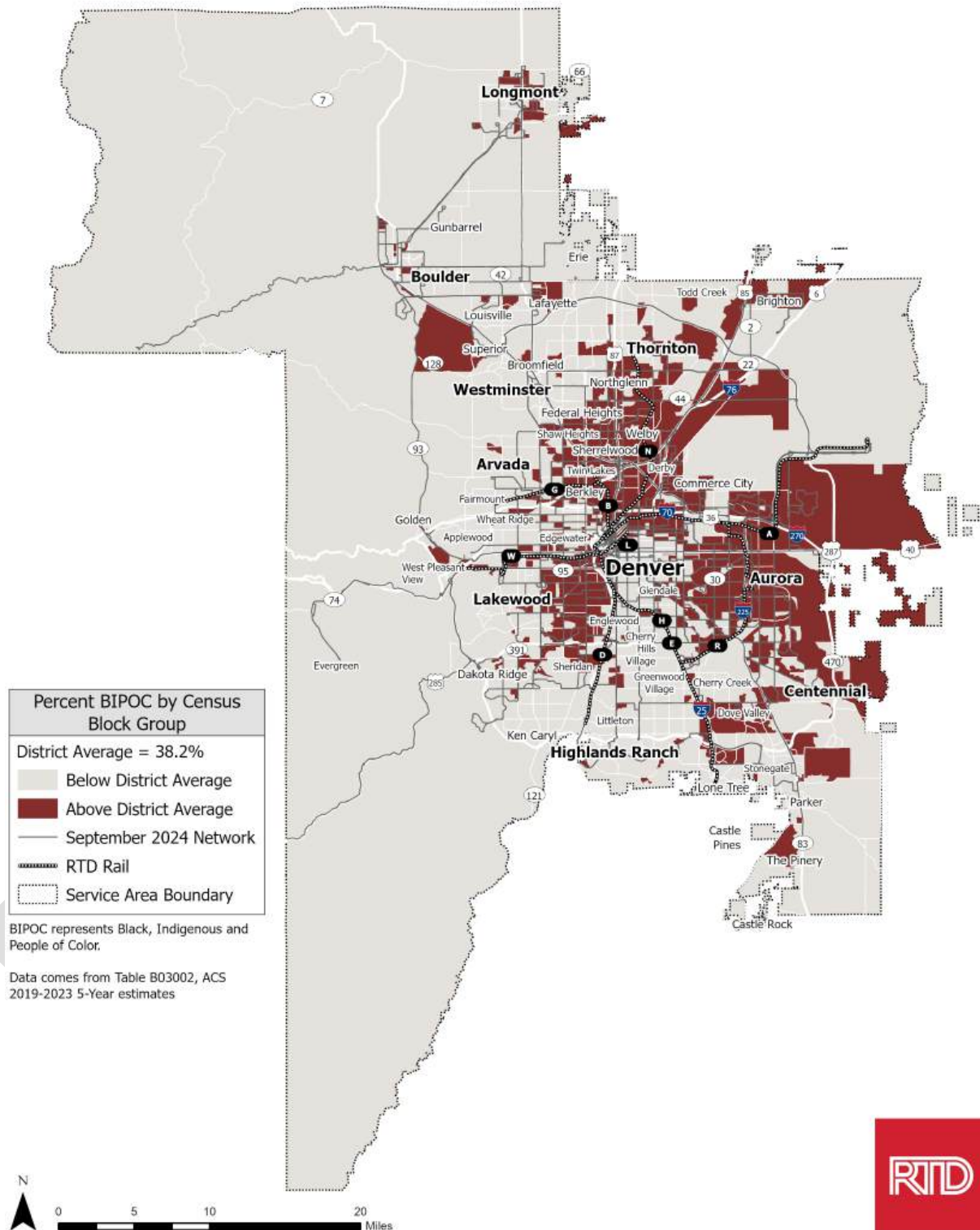
# **RTD 2025-2028 Title VI Program**

Pending board approval and adoption, RTD is considering raising the threshold of its disproportionate burden policy from 150% to 200% of the HHS federal poverty level. This change would provide a more inclusive representation of low-income households within the RTD service area. Figure 13 illustrates the projected impact, with block groups shaded to indicate areas where the population at or below 200% of the federal poverty level meets or exceeds the RTD service area average (20.3%), as reported in the 2019-2023 ACS.

For additional demographic data related to language, refer to the Language Access Plan in **Attachment F**.

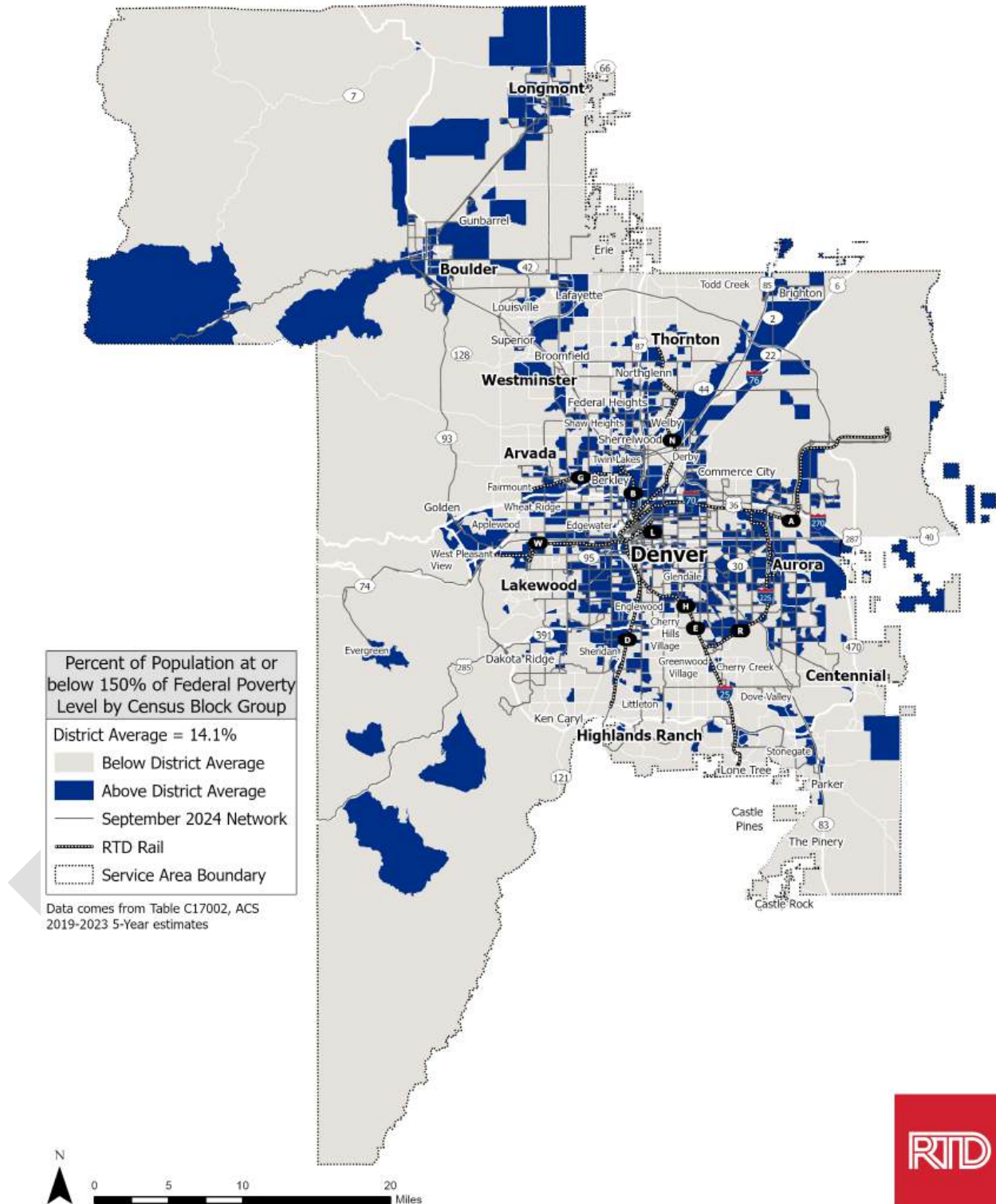
# RTD 2025-2028 Title VI Program

Figure 11. RTD Network and Service Area with BIPOC



# RTD 2025-2028 Title VI Program

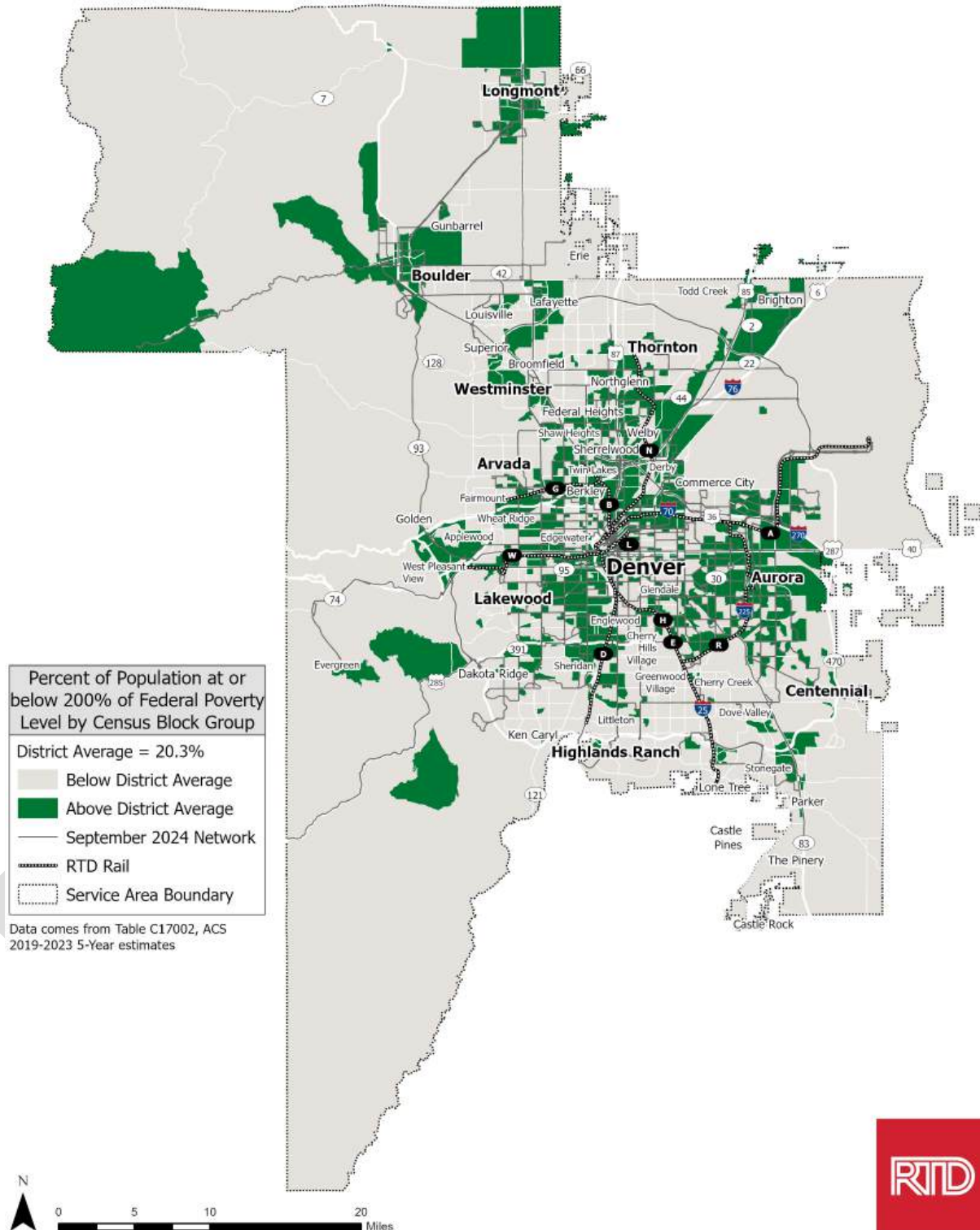
Figure 12. RTD Network and Service Area with Low-Income Population at or Below 150% of Federal Poverty Level





# RTD 2025-2028 Title VI Program

Figure 13. RTD Network and Service Area with Low-Income Population at or Below 200% of Federal Poverty Level



# RTD 2025-2028 Title VI Program

## Facilities and Demographics Assessment

Twelve maps (Figures X-X) illustrate RTD's compliance with Title VI regarding recent, ongoing, and planned improvements to major transit facilities. These figures highlight facilities that:

- Have been recently replaced or upgraded
- Are currently undergoing improvements
- Are planned for upgrades within the next five years, as identified in planning documents

Figures X provides an overview of all RTD facilities within the service area. Figure X maps these facilities in relation to census block groups where BIPOC populations exceed the district average (38.2%), while Figure X does the same for low-income populations (above 14.1%). Facilities are categorized as Park-n-Rides, Rail Stations, Transit Centers, Operations and Maintenance Facilities, and Administrative Buildings.

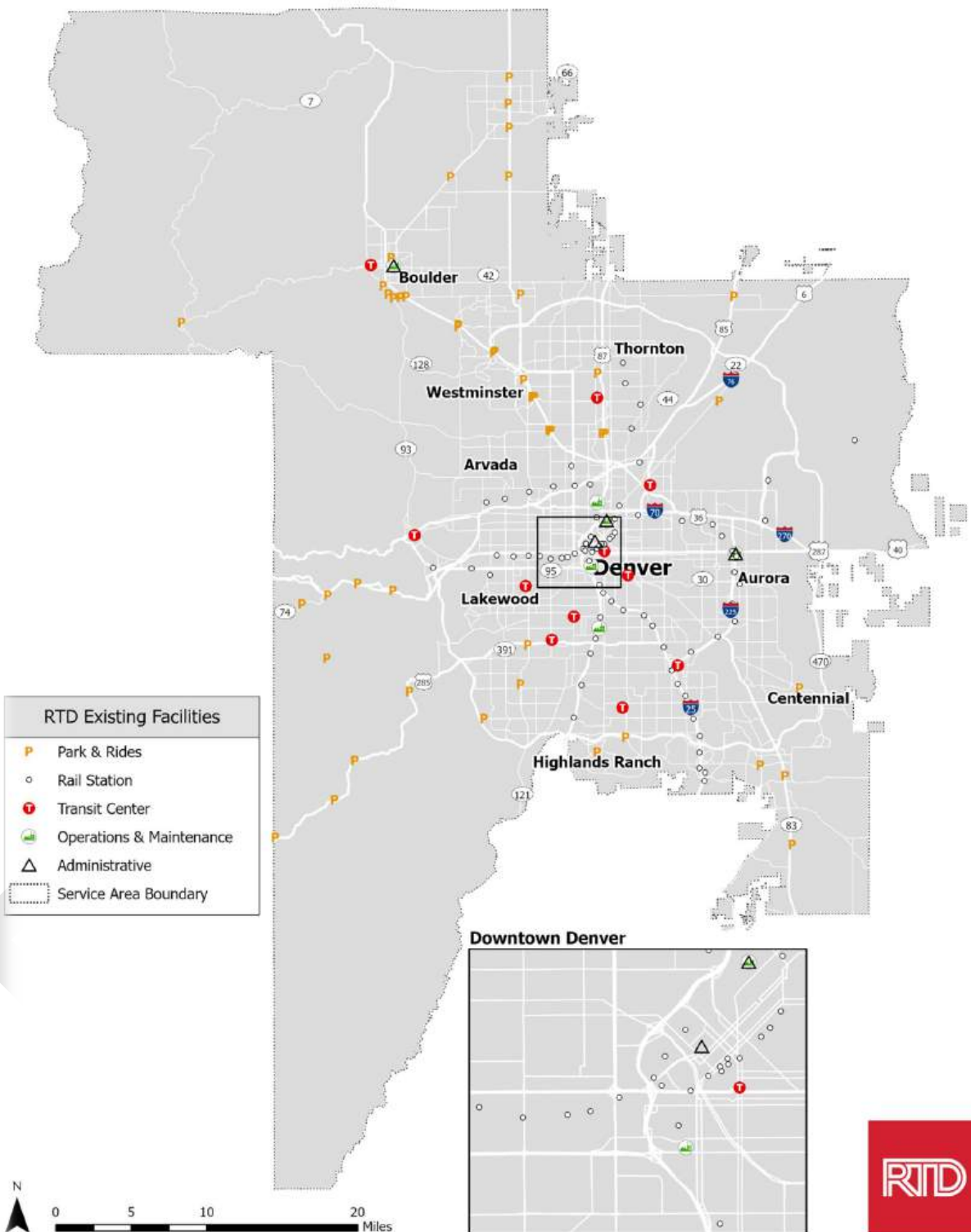
The following figures break down facility improvement maps, using the same district averages for BIPOC (38.2%) and low-income (14.1%) populations:

- Figures X-X: Recent improvements – Base map (Figure X), with BIPOC (Figure X) and Low-Income (Figure X)
- Figures X-X: Ongoing improvements – Base map (Figure X), with BIPOC (Figure X) and Low-Income (Figure X)
- Figures X-X: Planned improvements (next five years) – Base map (Figure X), with BIPOC (Figure X) and Low-Income (Figure X)

These maps show how RTD's transit facility investments are equitably distributed and aligned with Title VI requirements.

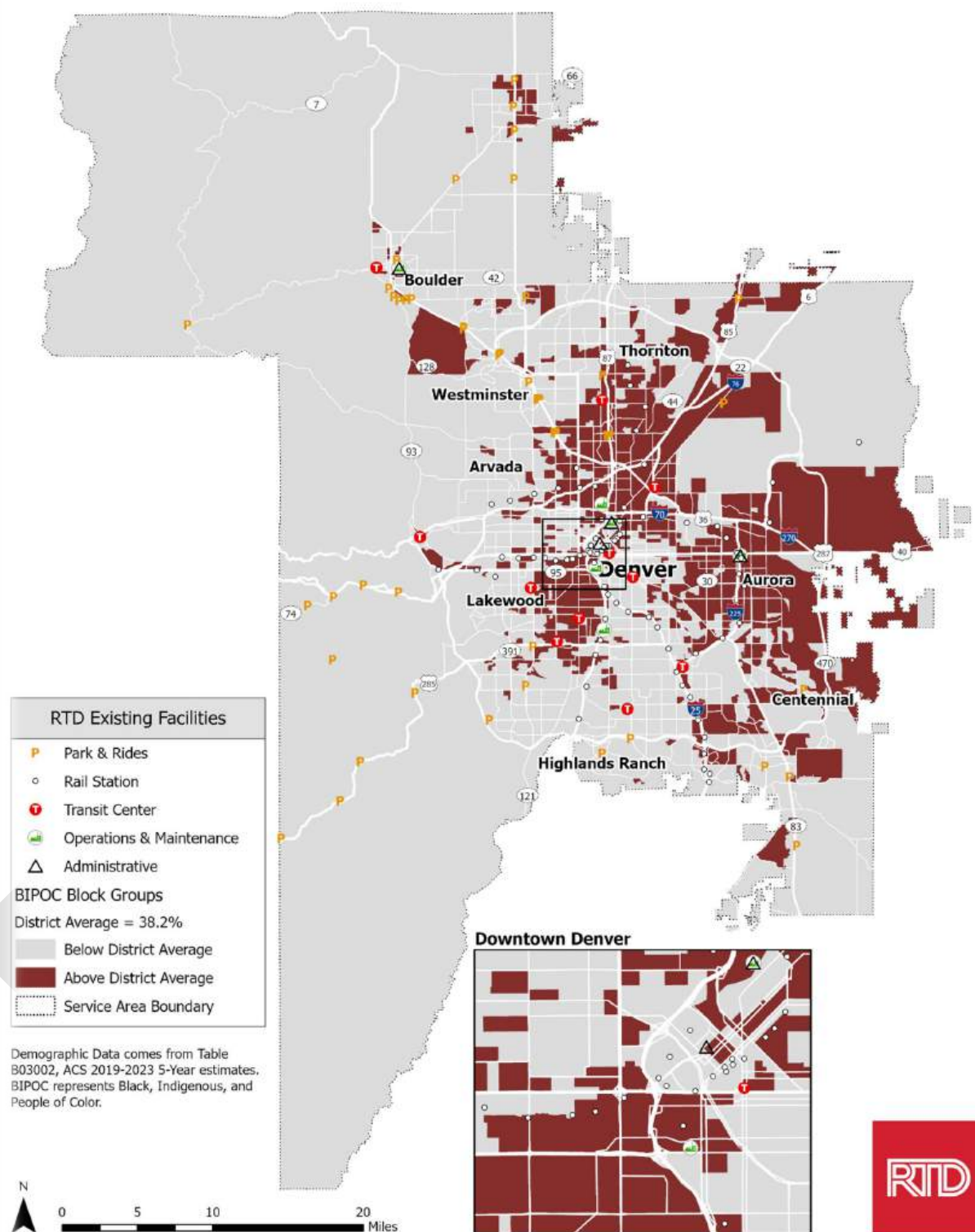
# RTD 2025-2028 Title VI Program

**Figure X.** Existing RTD Facilities



# RTD 2025-2028 Title VI Program

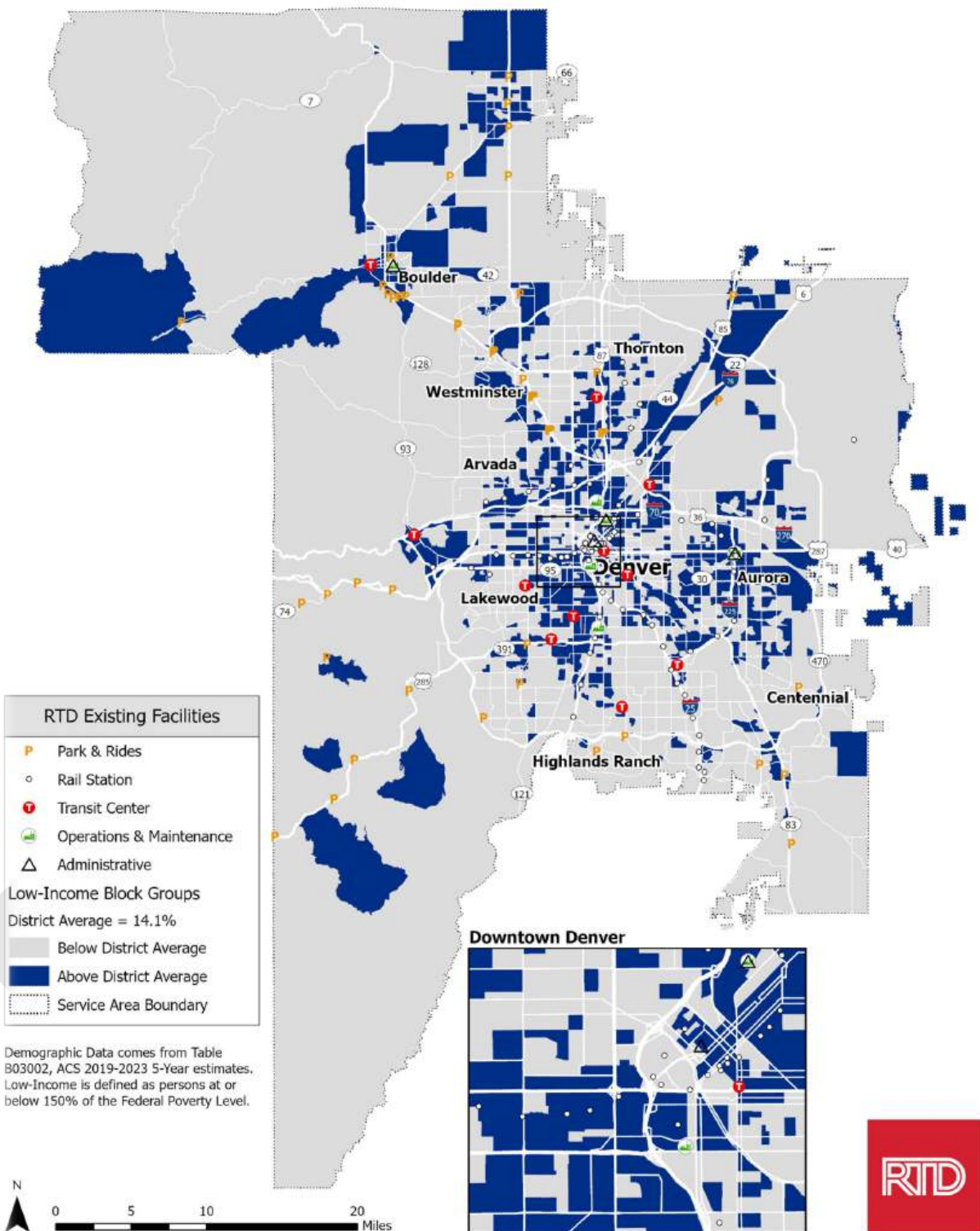
**Figure X.** Existing RTD Facilities with BIPOC Population





# RTD 2025-2028 Title VI Program

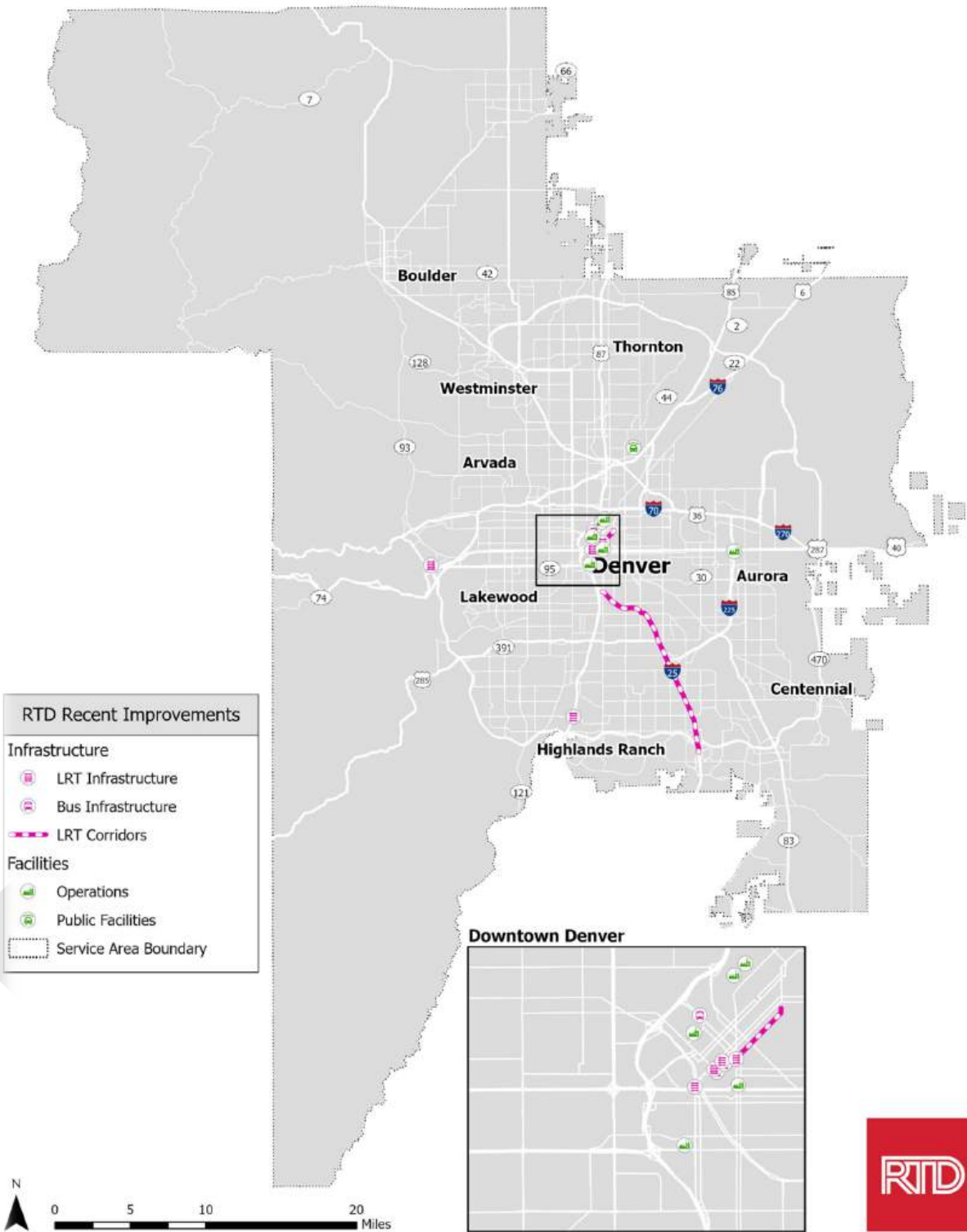
**Figure X.** Existing RTD Facilities with Low Income Population





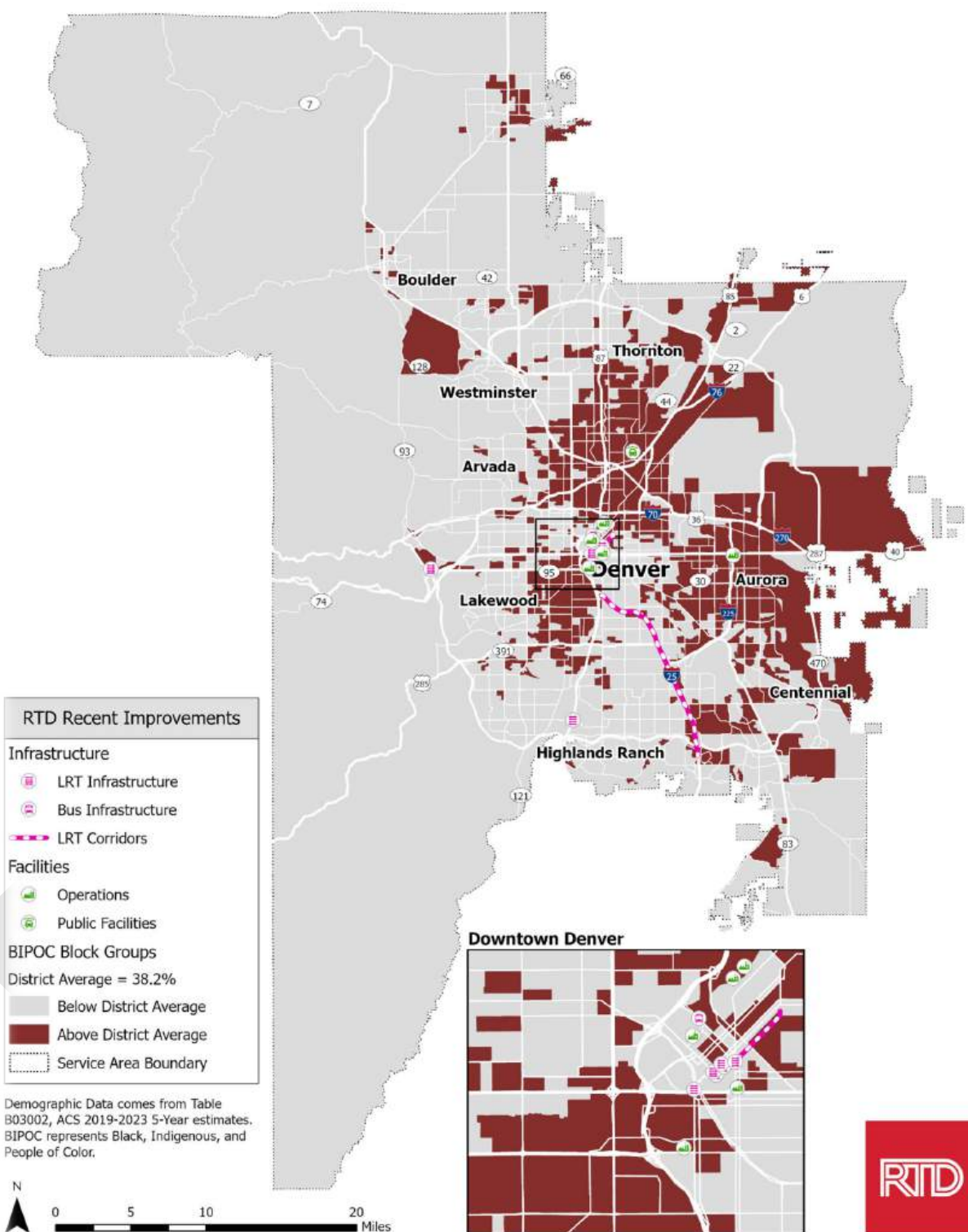
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*Figure X.*



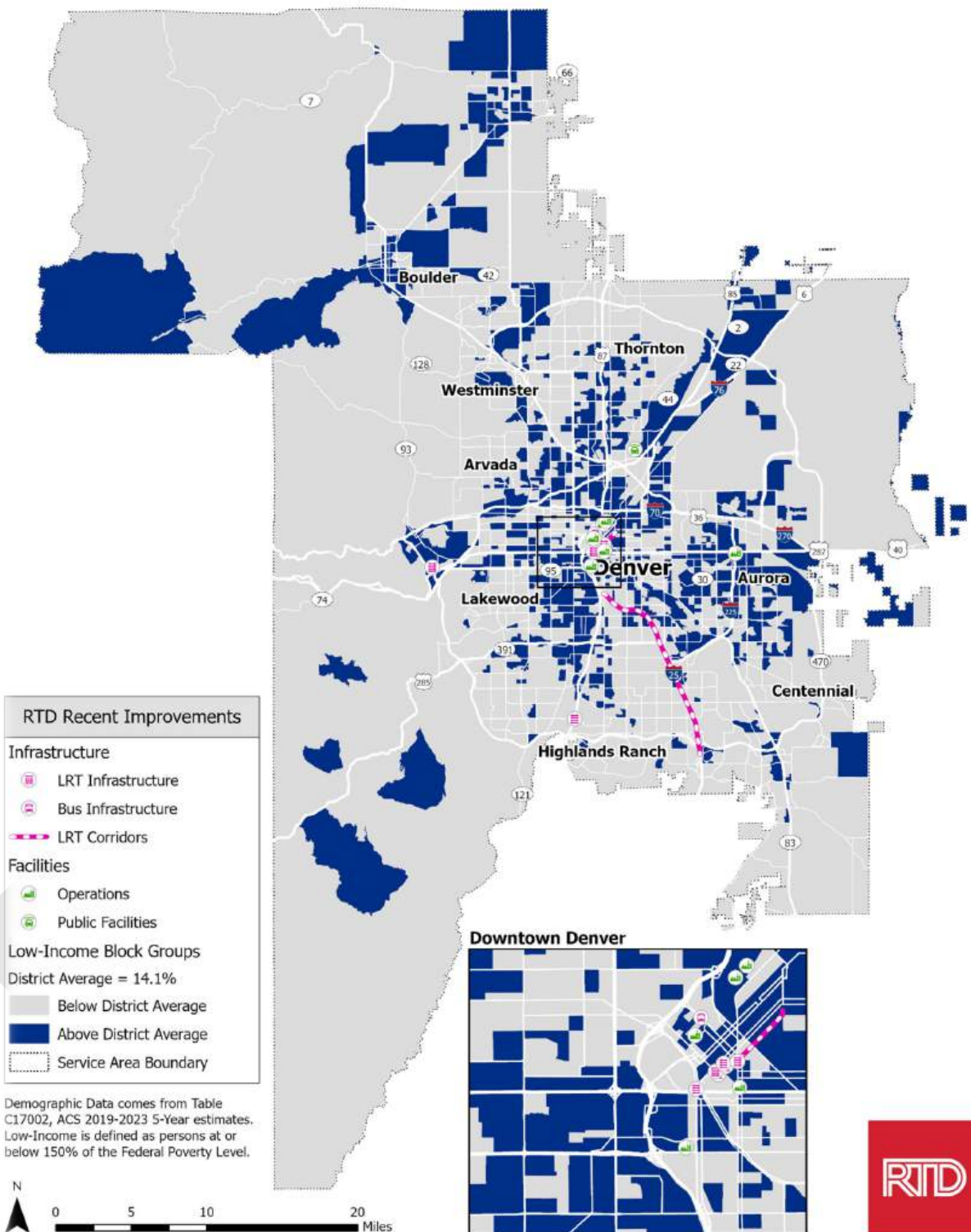
# RTD 2025-2028 Title VI Program

**Figure X.** Recent Improvements by Facility with BIPOC Population



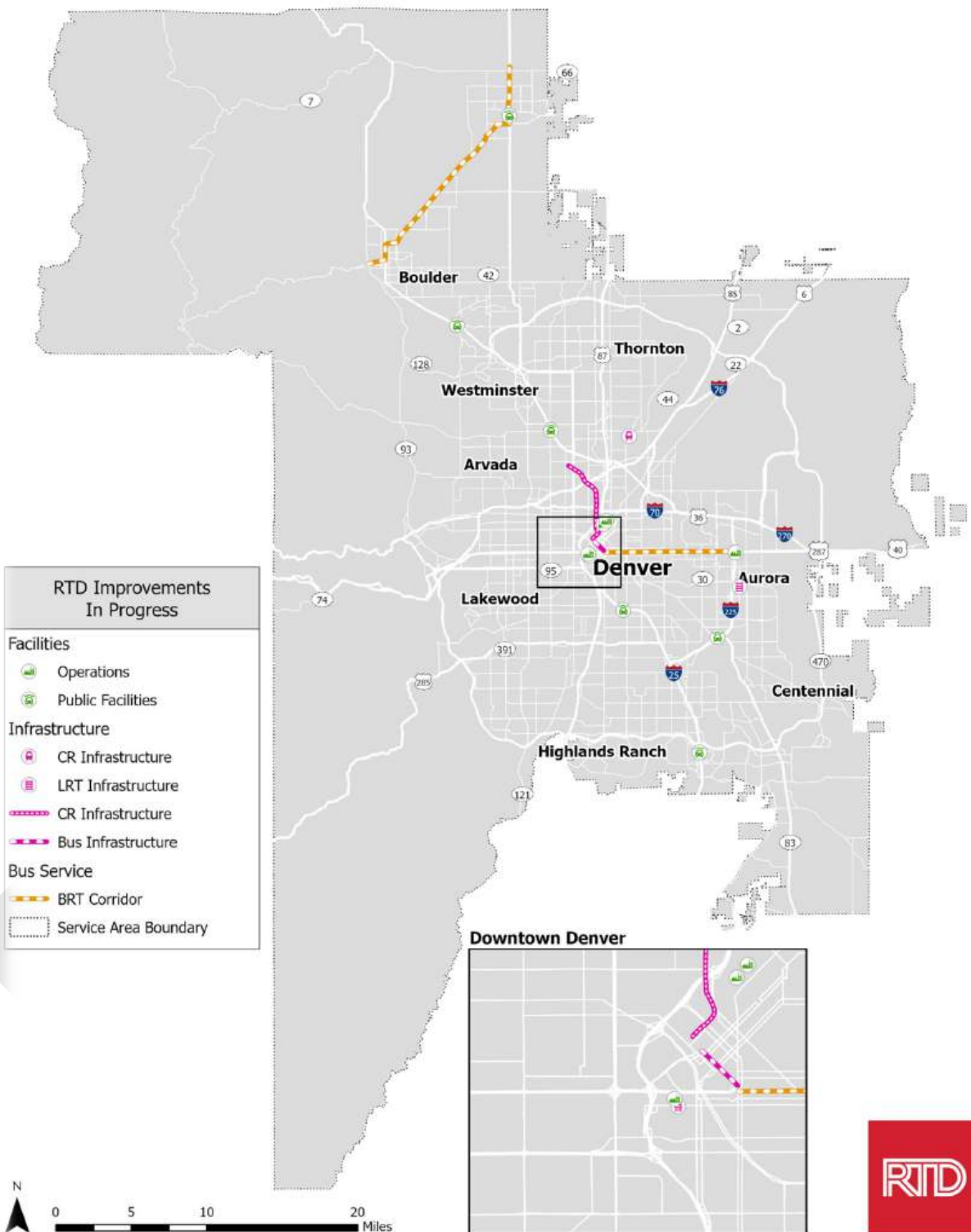
# RTD 2025-2028 Title VI Program

**Figure X.** Recent Improvements by Facility with Low-Income Population



# RTD 2025-2028 Title VI Program

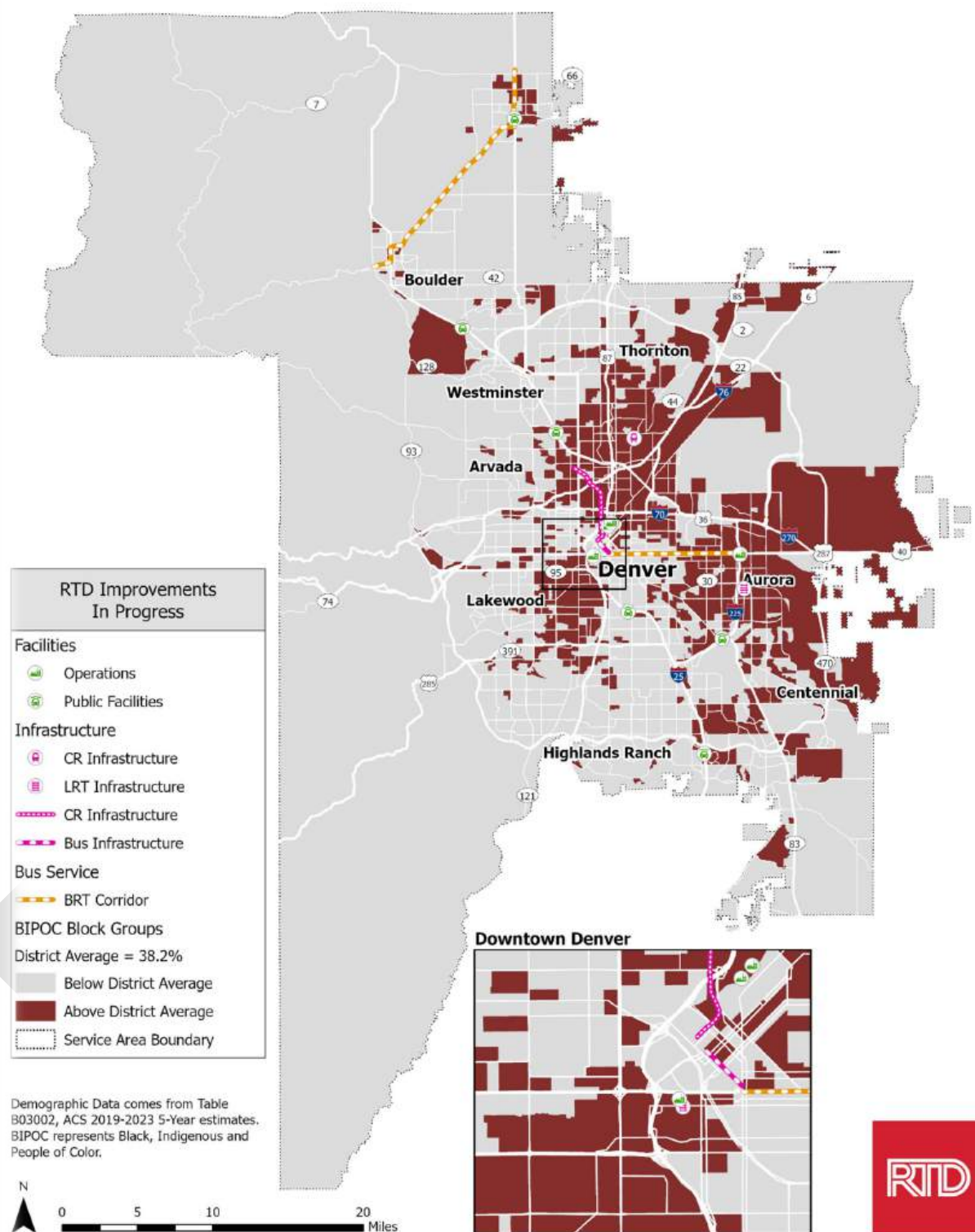
**Figure X.** *In-Progress Improvements by Facility*





# RTD 2025-2028 Title VI Program

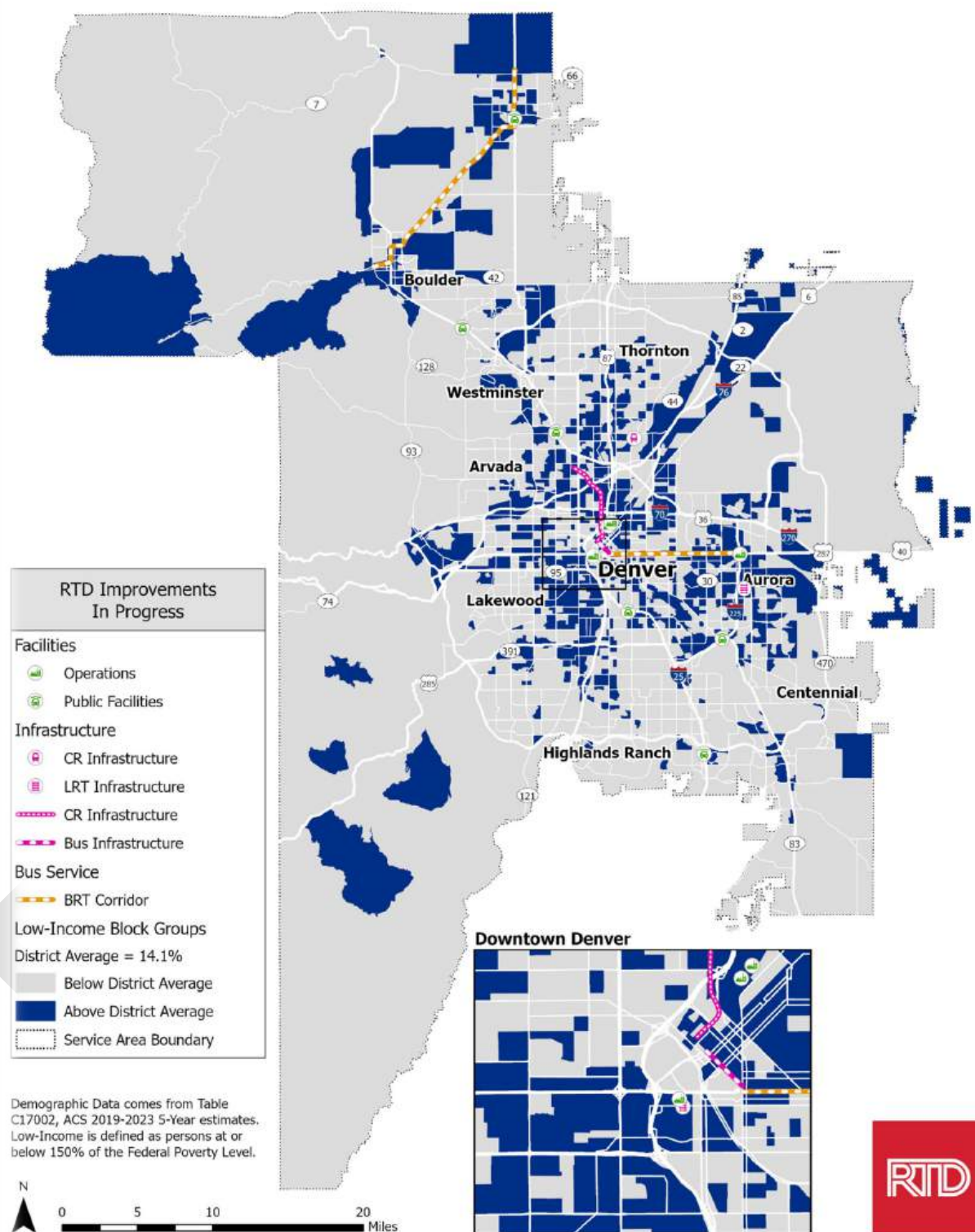
**Figure X.** In-Progress Improvements by Facility with BIPOC Population





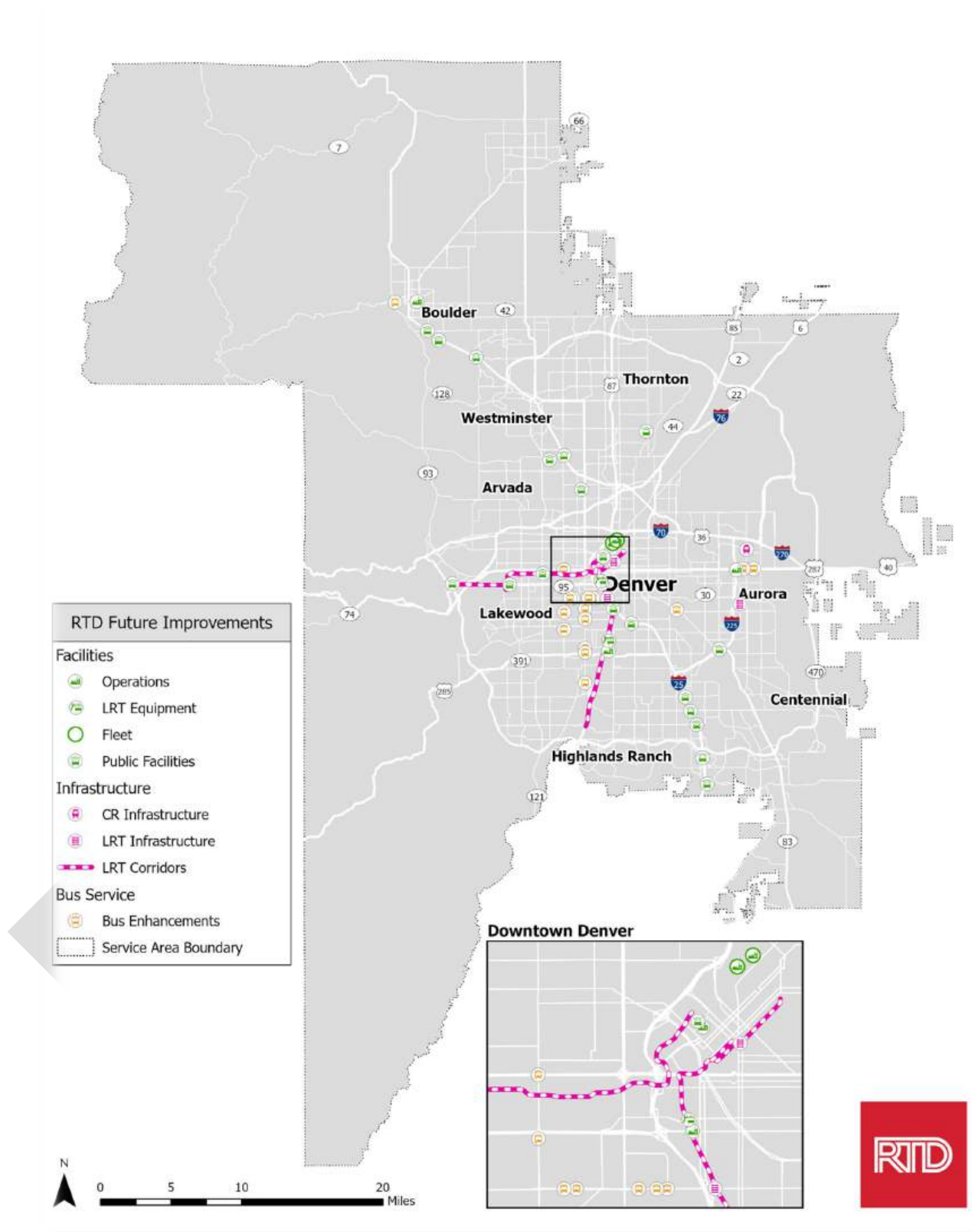
# RTD 2025-2028 Title VI Program

**Figure X.** *In-Progress Improvements by Facility with Low-Income Population*



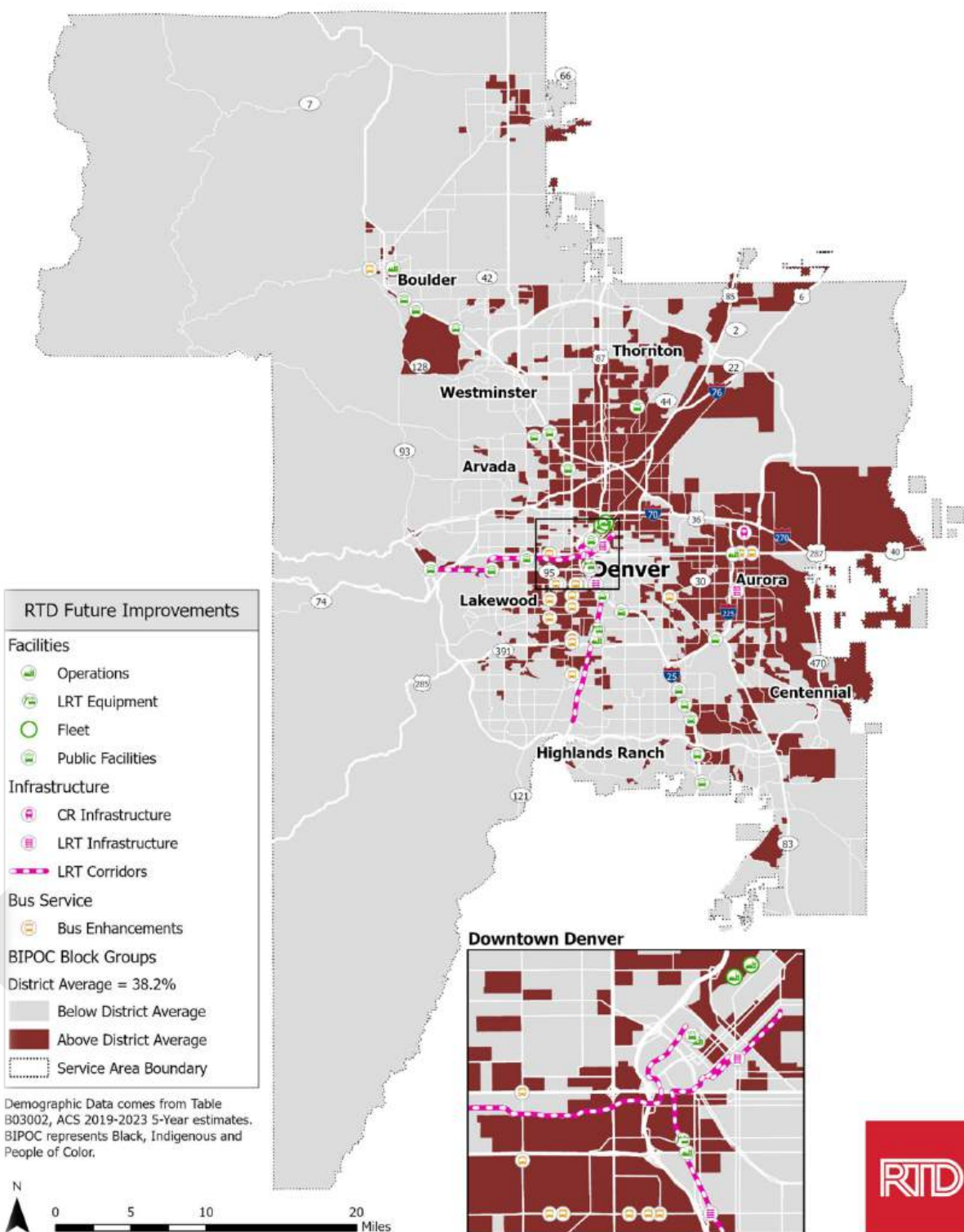
# RTD 2025-2028 Title VI Program

*Figure X. Planned Improvements by Facility*



# RTD 2025-2028 Title VI Program

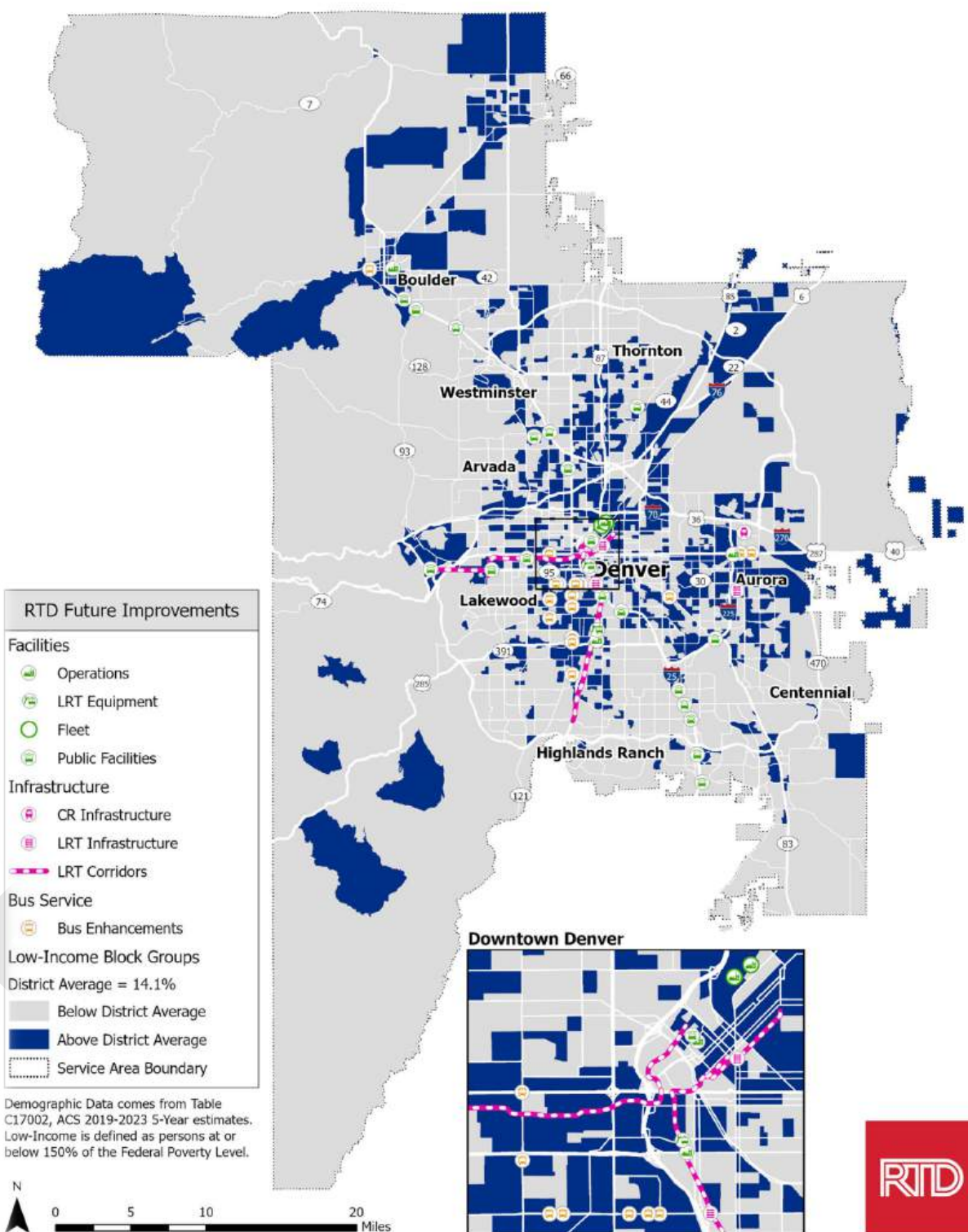
**Figure X.** *Planned Improvements by Facility with BIPOC Populations*





# RTD 2025-2028 Title VI Program

**Figure X.** *Planned Improvements by Facility with Low-Income Populations*



# RTD 2025-2028 Title VI Program

## Description of Engagement Efforts to Update Title VI Program

THIS SECTION WAS UPDATED MAY 1 AND WILL BE COMPLETED UPON BOARD APPROVAL AND ADOPTION AT THE END OF MAY.

RTD conducted a comprehensive engagement process to ensure that the 2025-2028 Title VI Program aligns with equity principles and community needs. This effort included consultation with internal departments and outreach to community-based organizations serving BIPOC, low-income, and linguistically diverse communities. Through these efforts, RTD sought to gather meaningful public feedback, identify potential barriers to access, and reaffirm its commitment to equitable transit services.

Outreach targeted the Title VI Program as a whole as well as specific sections, such as the Language Access Plan and Title VI Policies, as detailed below.

### Engagement Efforts on the Overall Title VI Program Update

Engagement on the overall Title VI Program update launched in April 2025.

- Title VI Program Update Main Webpage: RTD developed [a dedicated webpage](#) to centralize public input on all elements of the Title VI Program update. The webpage contained a survey to allow the public to provide direct feedback on the program.
- Survey Promotion: The public survey was open from January 2 to May 22, 2025. RTD promoted the survey and encouraged participation through the following tactics:
  - News Media Outreach: On April 7, 2025, RTD issued an English news release to 712 media subscribers, including municipal staff, public information officers (PIOs), and other stakeholders. The release had a 36% open rate (209 opened). A Spanish version was sent to 102 multicultural media contacts and received a 47% open rate (36 opened). Public Relations also shared the information through the stakeholder newsletter, which is sent to customers who have opted to receive updates on various RTD topics. The newsletter reached 28,410 subscribers and had an open rate of 43.3% (8,532 opened). Additional coverage is scheduled in the May 2025 edition of *Read-n-Ride*, RTD's customer newsletter.
  - Community-Based Organizations: RTD collaborated with CBOs that serve BIPOC, low-income, and linguistically diverse populations. Contracted partners engaged more than 412 individuals across four outreach events and promoted the program via social media, newsletters, radio, and public meetings. Servicios de la Raza featured the update in its newsletter, which reaches more than 45,000 people. RTD also sent a mass email to more than 1,000 community-based organizations and direct service providers, encouraging participation in the comment process.
  - Emails to LiVE and Transit Assistance Grant (TAG) Program Participants: The Transit Equity Office sent an email to 12,375 participants of the LiVE income-based fare program and to 150 organizations supported by the TAG Program.
  - Community Events: Staff from the Transit Equity Office and the Communications and Engagement Department engaged directly with the public at community events on April 25 and 26, with additional outreach scheduled for May 10, 16, and 17.
  - Social Media: RTD amplified outreach using both organic and paid social media. Six organic posts ran between April 7 and May 12. Paid ads focused on high-density BIPOC and low-income neighborhoods were deployed from April 29 to May 13.



# RTD 2025-2028 Title VI Program

As a result of these efforts, RTD received 27 survey responses on various elements of the Title VI Program. The feedback collected informed refinements to the final document. See **Attachment Y** for a summary of feedback received.

## Engagement Efforts on the Language Access Plan

To inform future language access initiatives, the Transit Equity Office conducted a survey with RTD staff (receiving 662 responses), a survey with linguistically diverse community members (receiving 578 responses), and a focus group with 15 bilingual/multilingual participants. For details, please read the Four Factor Analysis in the Language Access Plan (**Attachment F**).

## Engagement Efforts on Title VI Policy Changes

To inform and refine updates to its Title VI policies, the Transit Equity Office collaborated with internal teams from Service Development and Revenue Management. This coordination ensured that proposed changes were thoroughly evaluated from both operational and equity perspectives.

As part of its engagement strategy, TEO led several initiatives to solicit public feedback and assess potential community impacts of the proposed changes. To facilitate community input, RTD launched a [dedicated webpage](#). The webpage featured background context and a bilingual (English and Spanish) survey that asked participants whether they agreed or disagreed with the proposed changes. Respondents also had the opportunity to share open-ended feedback to inform a more nuanced understanding of community needs.

To solicit additional qualitative input, particularly from BIPOC and low-income communities, RTD conducted a series of in-person and organizational engagements. These efforts focused on understanding how the proposed policy focus areas (e.g., new facility locations, service changes, and fare adjustments) may impact historically underserved populations based on their lived experiences with public transit.

The outline of engagement conducted is summarized below:

- Denver Regional Mobility Access Council (DRMAC): RTD staff provided an overview of the proposed Title VI policy changes and gathered feedback during DRMAC's monthly meeting on January 14, 2025, which had 25 attendees. DRMAC serves as a forum dedicated to overcoming mobility barriers through education, collaboration, and advocacy to enhance quality of life.
- Boulder County Mobility and Access Coalition (MAC): RTD staff presented the proposed updates and solicited feedback during the Boulder County MAC monthly meeting on January 22, 2025, with 22 attendees. The coalition brings together community organizations, individuals, and interest groups working to improve transportation services for those facing mobility challenges, including low-income households, older adults, people with disabilities, youth, and veterans.
- Village Exchange Center (VEC): RTD gathered public input on the proposed changes by engaging with approximately 64 attendees at VEC's Resource Fair on January 23, 2025. The event provided wraparound services to populations in need across Aurora and the Denver metro area.
- Community Partners Initiative: During the inaugural Community Partners Initiative convening on January 28, 2025, RTD staff reviewed and discussed the proposed changes with 12 community-based organizations serving diverse populations, including the Denver National Association for the Advancement of Colored People (NAACP), National Organizations for Youth Safety (NOYS), Servicios de la Raza, Organization for Chinese Americans (OCA), Fortaleza Familiar, Boulder Housing, The Delores Project, the Action Center, Denver Street Partnership (DSP), My Father's House Denver, the Empowerment Program, The Spirit of Christ Church, and Aurora Mental Health and Recovery (AMHR).
- Black and Brown Parents United Foundation (BPUF): RTD sponsored a table at BPUF's community event on January 31, 2025, which focused on health equity and air quality action. At the event, RTD provided

# RTD 2025-2028 Title VI Program

information and collected feedback on the proposed updates from 35 attendees. BPUF is a community-based organization dedicated to supporting parents of Black and brown children by fostering empowerment and promoting equity, diversity, and inclusion through confidence building, community development, and engagement.

- Outreach through Community Publications, Partner Organizations, and Contractors: RTD shared information about the opportunity for public feedback on the proposed policies in the January/February 2025 issue of the *MUSE*, a bi-monthly publication serving Montbello, Denver's Far Northeast community, and the Servicios de la Raza newsletter, a social service organization supporting Colorado's Latino community. RTD also contracted MOES, a multicultural outreach firm; CREA Results, a community-based organization focused on equity through research, education, and awareness; and Denver Streets Partnership, a coalition advocating for people-friendly streets.
- RTD's Advisory Committees (ACPD and CAC): RTD engaged APAC and CAC for insights on the proposed Title VI policy changes during their monthly meetings on February 11, 2025, and February 13, 2025, respectively, with 20 attendees at each meeting.
- RTD's News Stop Press Release and Read-n-Ride Newsletter: RTD disseminated information about the opportunity for public feedback on the proposed Title VI policy changes through a public [press release](#) issued via News Stop on January 2, 2025 (sent to 675+ subscribers including multicultural media outlets). Additional outreach followed through the Read-n-Ride newsletter on January 6, 2025 (sent to 992+ subscribers).

## Title VI Policies Survey Results

The survey remained open to the public from January 2, 2025, through March 15, 2025, allowing individuals across the RTD service area to participate. Following the survey closure, RTD analyzed the survey data to identify key themes, understand community concerns, and pinpoint areas for potential policy refinement. RTD received 75 survey responses related to the proposed Title VI policy changes. The majority of respondents expressed support for the changes, recognizing their potential to strengthen equitable access to transit services.

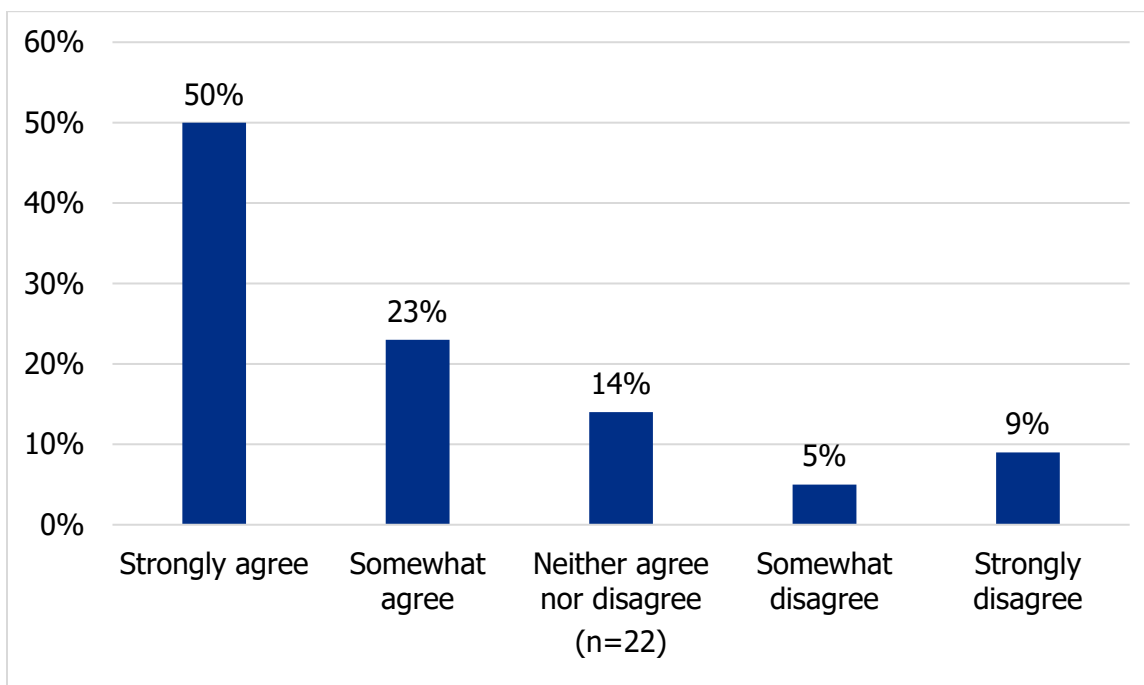
The following section summarizes key themes that emerged from the survey responses. Full comments are included in **Attachment Y**.

# RTD 2025-2028 Title VI Program

## Major Service Change Policy

As shown in Figure X, approximately 73% of survey respondents reported that they somewhat or strongly agreed with the proposed changes.

**Figure X.** Survey Results: Major Service Change Policy



## Key Public Feedback Themes

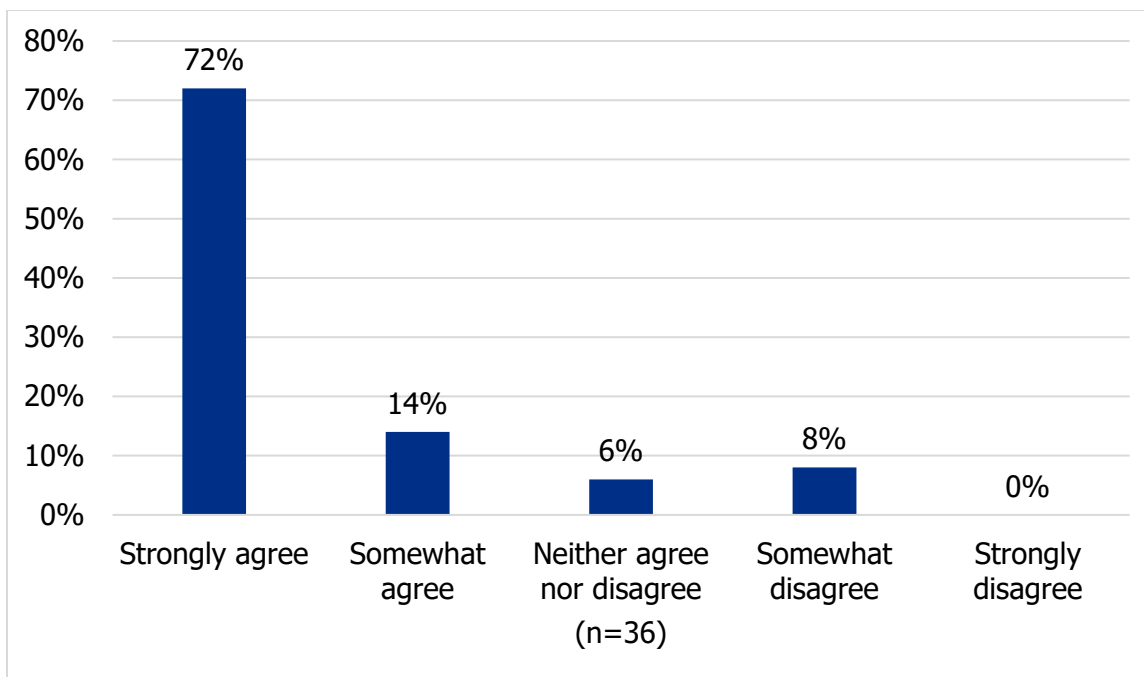
- Broad support for the policy updates as a step toward equity: Commenters expressed general support for the major service change policy, viewing it as a positive step toward improving transit equity and increasing oversight of service changes that may adversely affect BIPOC and low-income communities.
- Desire to include unplanned or informal service changes: Respondents recommended that unplanned or unofficial service disruptions, such as detours or prolonged slowdowns, be evaluated under the major service change criteria. They argued that these disruptions can create disproportionate burdens and should trigger equity analyses.
- Calls for a more inclusive and responsive approach: Some commenters suggested refinements to ensure the policy better reflects the lived experiences of customers. This included recommendations to lower the major service change threshold or re-evaluate the 36-month cumulative change period, with concerns that outdated demographic data could limit the accuracy of equity analyses.

# RTD 2025-2028 Title VI Program

## *Disproportionate Burden Policy*

As illustrated in Figure X, approximately 86% of survey respondents indicated that they somewhat or strongly supported the proposed changes.

**Figure X.** Survey Results: Disproportionate Burden Policy



## Key Public Feedback Themes

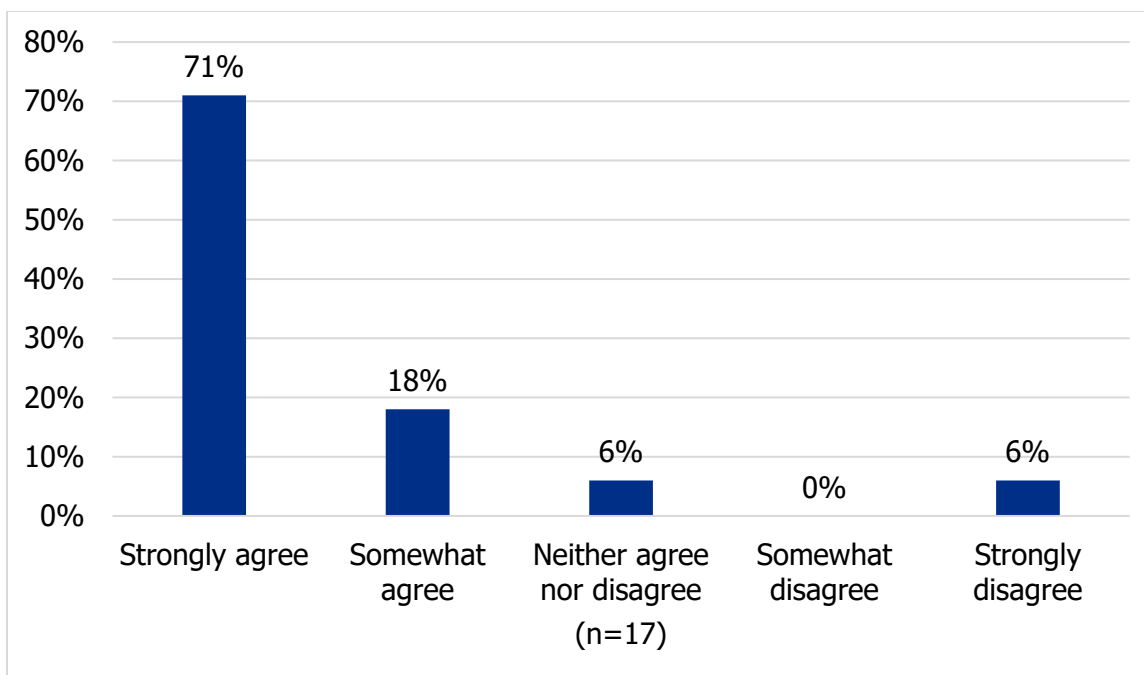
- Support for expanding the low-income definition: A significant portion of respondents expressed strong support for the updated low-income definition. Many emphasized the importance of adjusting the definition to reflect the realities of today's economy, especially in the Denver metro area where the cost of living is higher than national averages. Suggestions include raising the threshold to better capture those who face financial hardship but are often excluded from traditional low-income categories.
- Proposals for a regionally relevant income threshold: Several commenters suggested revising the low-income threshold to better reflect regional economic conditions. They proposed using Area Median Income (AMI) as a metric to define low income or raising the income limit to ensure that more working-class households, particularly those earning between \$40,000 and \$50,000 annually, are included in the policy.
- Concerns about the adequacy of the proposed definition: Some respondents voiced concerns that the proposed 200% of the federal poverty level may still exclude essential workers, especially those in low-wage jobs. They recommended adjusting the low-income definition to capture workers earning at or near minimum wage, ensuring greater inclusivity for those who face significant transportation barriers.

# RTD 2025-2028 Title VI Program

## Fare Equity Policy

Figure X demonstrates that 89% of survey respondents expressed support for the proposed changes, either somewhat or strongly.

**Figure X.** Survey Results: Fare Equity Policy



## Key Public Feedback Themes

- Positive reception to proposed fare adjustments: Many respondents expressed support for the proposed fare changes, with some highlighting how the adjustments would improve their ability to access essential services and areas. They welcomed the focus on addressing the needs of underserved communities.
- Concerns about cashless payments and fare enforcement: Some respondents expressed concern about the potential exclusion of individuals who rely on cash for fare payment. There were also suggestions that fare enforcement could disproportionately affect low-income riders, with one commenter advocating for alternatives to fines, such as more flexible or on-the-spot fare collection methods.
- Desire for improved communication and transparency: Some commenters requested more information about how fare equity policies are applied across various regions of RTD's service area, and some voiced interest in further understanding the mechanisms of fare equity, including potential regional differences. Respondents also encouraged clear communication about eligibility for programs like the agency's LiVE income-based discount program.



# **RTD 2025-2028 Title VI Program**

## **Attachments List**

Attachment A: Board Approval of 2025-2028 Title VI Program  
Attachment B: Title VI Complaint Forms  
Attachment C: Transit Equity Nondiscrimination Policy  
Attachment D: Transit Equity Complaint Management Procedures  
Attachment E: Public Participation Plan  
Attachment F: Language Access Plan  
Attachment G: Subrecipient Compliance Guide  
Attachment H: Smart Commute Metro North Concurrence Letter  
Attachment I: Smart Commute Metro North Signed Title VI Policy Statement  
Attachment J: Allied Universal Title VI Concurrence Letter  
Attachment K: Denver Transit Partners Title VI Concurrence Letter  
Attachment L: Transdev Title VI Concurrence Letter  
Attachment M: MTM Transit Title VI Concurrence Letter  
Attachment N: January 2025 Service Equity Analysis  
Attachment O: September 2024 Service Equity Analysis  
Attachment P: Zero Fare for Youth Fare Equity Analysis  
Attachment Q: May 2024 Service Equity Analysis  
Attachment R: September 2023 Service Equity Analysis  
Attachment S: Systemwide Fare Study and Equity Analysis  
Attachment T: May 2023 Service Equity Analysis  
Attachment U: January 2023 Service Equity Analysis  
Attachment V: MyRide Stored Value Discount Fare Equity Analysis  
Attachment W: 2022 Service Performance Monitoring Report  
Attachment X: Transit Service Policies and Standards  
Attachment Y: Title VI Proposed Policy Change Feedback

# **RTD 2025-2028 Title VI Program**

## **Attachments**

### **Attachment A: Board Approval of 2025-2028 Title VI Program**

DRAFT

Board Approval of 2025-2028 Title VI Program

Will be inserted upon board approval

# **RTD 2025-2028 Title VI Program**

## **Attachment B: Title VI Complaint Forms**

DRAFT



# 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](mailto: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)



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**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

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 ተግባሮች 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 ያስፈልገበትን 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](mailto:titlevicomplaints@rtd-denver.com) ኢሜል መላክ ይችላሉ ።

1. የቅሬታ አቅራቢው ስም: \_\_\_\_\_
2. አድራሻ: \_\_\_\_\_
3. ከተማ: \_\_\_\_\_ ግዛት: \_\_\_\_\_ ዚፕ ኮድ: \_\_\_\_\_
4. የስልክ ቁጥር (የቤት): \_\_\_\_\_ (የስራ): \_\_\_\_\_
5. አድልዎ የተደረገበት ሰው (ቅሬታ አቅራቢ ካልሆነ በስተቀር)  
 ስም: \_\_\_\_\_  
 አድራሻ: \_\_\_\_\_  
 ከተማ: \_\_\_\_\_ ግዛት: \_\_\_\_\_ ዚፕ ኮድ: \_\_\_\_\_
6. አድልዎ በምን ላይ የተመሰረተ ነበር? (የሚመለከትዎት ሁሉ ላይ ምልክት ያድርጉ)  
☐ ብሔር ☐ ቀለም ☐ ብሔራዊ መሰረት
7. መድልዎ ከስተት የተከሰተበት ቀን: \_\_\_\_\_
8. እንዴት አድልዎ እንደተፈፀመብህ ግለጽ። ምን ተፈጠረ እና ተጠያቂው ማን ነበር? ለተጨማሪ ቦታ፣ ተጨማሪ የመጠቀሚያ ወረቀት ከቅጹ ጀርባ ያያይዙ።
9. ምን የ RTD ተወካዮች ተሳትፈዋል?
10. 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።

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

هر فردی که معتقد است به خاطر تبعیض ناشی از نژاد، رنگ پوست یا ملیت از شرکت در برنامه‌ها، فعالیت‌ها، یا خدمات RTD یا بهرماندی 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](mailto: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

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](mailto: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)  
☐ Race ☐ 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



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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](mailto: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](mailto: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।

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 nqa 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](mailto: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

人種、肌の色、出身国に基づく差別により、RTDのプログラム、活動、またはサービスへの参加から除外された、またはその恩恵を受けることを拒否されたとお考えになる場合、RTDに公民権法第六編（タイトルVI）に関する苦情を申し立てることができます。

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](mailto: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:

☐ ភ្នាក់ងារសហព័ន្ធ

☐ តុលាការសហព័ន្ធ

☐ ភ្នាក់ងាររដ្ឋ

☐ តុលាការរដ្ឋ

☐ ភ្នាក់ងារក្នុងមូលដ្ឋាន

☐ 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 설명해주십시오. 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 제출하셨습니다가?**

(해당 공란에 표시하십시오) ☐ 예 ☐ 아 니 요

예라고 답했다면, 탄원서가 제출된 각 기관에 체크 표시를 하십시오.

- |                                |                                |                               |
|--------------------------------|--------------------------------|-------------------------------|
| <input type="checkbox"/> 연방 기관 | <input type="checkbox"/> 연방 법원 | <input type="checkbox"/> 주 법원 |
| <input type="checkbox"/> 주 법원  | <input type="checkbox"/> 지방 법원 | <input type="checkbox"/> 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 ເພື່ອແຈ້ງເຂົ້າວ່າຄໍາຮ້ອງຮຽນຈະໄດ້ຮັບການກວດສອບໂດຍ 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](mailto: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

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](mailto: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

## 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](mailto: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



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](mailto: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 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



# 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](mailto: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 tanggihan 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](mailto: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](mailto: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 ลูกจ้างจะได้รับจดหมายตอบรับซึ่งจะแจ้งให้ทราบว่า 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](mailto: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 เข้าไปมีส่วนเกี่ยวข้องกับอะไรบ้าง
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](mailto: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



# **RTD 2025-2028 Title VI Program**

## **Attachment C: Transit Equity Nondiscrimination Policy**

DRAFT



<b>Policy Name:</b>	<b>Transit Equity Nondiscrimination Policy</b>				
<b>Policy #:</b>	<b>RTD-CIV-PLY-0004</b>	<b>Date Issued:</b>	11/8/2023	<b>Current Version:</b>	<b>B</b>
<b>General Manager Approval:</b>					
<b>Chief Administrative Officer Approval:</b>					
<b>Responsible Department:</b>	Administration				

## 1. POLICY STATEMENT

The agency 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 federal law, Title VI of the Civil Rights Act of 1964 and Colorado law, Colorado Revised Statutes §24-34-601, it is the agency's policy to ensure protected individuals and groups are entitled to enjoy its 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 shall be excluded from participation in, denied the benefit of, or be subjected to discrimination under any agency program, service or activity because of race, color, national origin (including limited English proficiency). Title VI extends protection to individuals who experience discrimination, including harassment, based on their actual or perceived: (i) shared ancestry or ethnic characteristics; or (ii) citizenship or residency in a country with a dominant religion or distinct religious identity.

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 the agency'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 the agency's services and transportation facilities.

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	<b>1 of 3</b>	<b>RTD-CIV-PLY-0004</b>	<b>B</b>

### 3. SCOPE

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

### 4. RESPONSIBILITIES

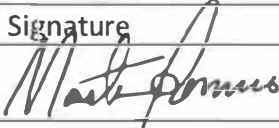
RTD is responsible for providing programs, activities, services, and transportation facilities in a manner that allows all customers to use programs, activities, services, and transportation facilities free from discrimination. The Transit Equity Office is charged with oversight and enforcement of this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

### 5. RESOURCES

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

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	2 of 3	RTD-CIV-PLY-0004	B

## REVISION BLOCK

Draft prepared by:			
Name	Signature	Position	Date
Martin Romero		Transit Equity Manager	November 7, 2023
Description of Revision(s): USDOT guidance and formatting			
Reviewed by: Debra Johnson, Leah Riley, Carl Green Jr., and Marques Barrington			
Information Governance and Management Division Acceptance: Patty Schmidt-Reed			
Version: B		Date issued: 11/8/2023	

# **RTD 2025-2028 Title VI Program**

## **Attachment D: Transit Equity Complaint Management Procedures**

DRAFT

<b>Procedure Name:</b>	<b>Transit Equity Complaint Management Procedure</b>				
<b>Procedure #:</b>	<b>RTD-CIV-PRC-0004</b>	<b>Date Issued:</b>	<b>11/8/23</b>	<b>Current Version:</b>	<b>B</b>
<b>General Manager Approval:</b>					
<b>Chief Administrative Officer Approval:</b>					
<b>Responsible Department:</b>	Administration				

## 1. PURPOSE AND SCOPE

The Office of Transit Equity establishes this Transit Equity Complaint Management Procedure (Procedure) to carry out its responsibilities in the administration and enforcement of policies related to nondiscrimination and to facilitate compliance with applicable laws. The Office of Transit Equity is responsible for oversight and coordination of compliance with the Title VI and Public Accommodations Discrimination Policy. This Procedure sets forth the process for addressing both informal and formal Title VI and Public Accommodation complaints pursuant to RTD's Transit Equity Nondiscrimination Policy including reports of the following:

- A. Discrimination and harassment in connection with the provision of any RTD program, activity, transportation facility or service on the basis of race, color, national origin (including limited English proficiency), religious identity, creed, sex, sexual orientation, gender identity, gender expression, marital status, disability, or ancestry as prohibited by RTD's Transit Equity Nondiscrimination Policy;
- B. Failure to provide language assistance services for non-native English speaker(s) or otherwise allowed by federal law; and
- C. Retaliation against any individual or group of individuals who exercise their rights under this Procedure or are involved in an investigation and/or the resolution of a complaint made under this Procedure.

Pursuant to this Procedure, the Office of Transit Equity will conduct neutral investigations, promote accountability for violations of policies and procedures, and partner with the agency's executive leadership and managerial staff to impose other remedies designed to eliminate prohibited discrimination, prevent its recurrence, and address its effects.

## 2. DEFINITIONS

Term	Definition
<b>Complaint</b>	An expression of concern shared with RTD regarding behavior that is alleged to be a violation of RTD's Transit Equity Nondiscrimination Policy. Both formal and informal complaints must be reviewed consistent with RTD's Transit Equity Complaint Management Procedure. A formal complaint is a written submission of a concern through one of the reporting mechanisms. Formal complaints require follow-up with the Complainant at the conclusion of the investigation. Informal complaints may be communicated in any manner and are differentiated from formal complaints by the complainant's desire to be kept apprised of any investigative outcomes. Because the individual who submits an informal complaint does not request follow-up or otherwise express any desire to engage in the process, an informal complaint does not need to be closed with the Complainant.
<b>Complainant</b>	A person who files a complaint alleging that they have been the subject of discrimination prohibited by the agency's Transit Equity Nondiscrimination Policy.
<b>Corrective Action</b>	Any action levied against an agency employee found responsible for violating agency policy by the employee's supervisor and/or any other appropriate agency representative in the employee's reporting chain. Corrective Action may also be referred to as Disciplinary Action and/or Disposition.
<b>Investigator(s)</b>	An objective, neutral factfinder with relevant training and experience. Review of concerns pursuant to this Procedure are completed by a Transit Equity Office staff member or other designee of the Civil Rights Division and can, in certain limited circumstances, be an external investigator. Investigator(s) do not have any disciplinary authority and as such do not impose Corrective Action.
<b>Preponderance of the Evidence</b>	The standard of proof that the Office of Transit Equity applies to its investigations. An allegation is proven by a preponderance of the evidence when it is more likely to have occurred than not to have occurred based on the information available and provided during the investigation.

<b>Reporting Party</b>	Any person who has shared a concern or reports an incident of discrimination prohibited by the agency's Transit Equity Nondiscrimination Policy. The Reporting Party need not be the Complainant and can include a third party witness (e.g., another person or agency employee or contractor).
<b>Respondent</b>	An RTD employee or contractor alleged to have behaved contrary to the agency's Transit Equity Nondiscrimination Policy.

### 3. RESPONSIBILITIES

Staff from the appropriate departments and divisions are responsible for processing, documenting, and collecting information related to concerns of discrimination as well as correctly classifying and/or coding discriminatory allegations consistent with the Transit Equity Nondiscrimination Policy and this Procedure.

The Transit Equity Manager must provide concurrence of each investigation to ensure that it meets the requirements set forth by the Federal Transit Administration as well as any best practices required by the Civil Rights Division.

The Transit Equity Manager or delegate shall be responsible for conducting an initial assessment of all complaints and overseeing the investigation of transit equity-related complaints, and for ensuring the transit equity complaint management procedure complies with any applicable laws, regulations, and other federal guidance.

If an employee witnesses behavior that is contrary to the Transit Equity Nondiscrimination policy, the employee must report the behavior to the employee's supervisor immediately. If the supervisor is unavailable or the employee is uncomfortable contacting the supervisor, the employee should contact the Transit Equity Manager or the Director of Civil Rights.

### 4. PROCEDURE

#### A. Complaint Initiation

A Reporting Party or Complainant alleging exclusion from participation in or denial of the benefits of the agency's programs, activities, services or transportation facilities due to discrimination on the basis of race, color, national origin (including limited English proficiency), religious identity, creed, sex, sexual orientation, gender identity, gender expression, marital status, disability, or ancestry may file a complaint with the Office of Transit Equity by downloading and submitting the Transit Equity Complaint Form (Title VI or C.R.S. §24-34-601) within 180 days from the date of the alleged incident. The completed form can be submitted in one of the following ways:

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	3 of 9	RTD-CIV-PRC-0004	B



- Mailed to: Transit Equity Nondiscrimination Complaints (Title VI and C.R.S. §24-34-601), 1660 Blake St - BLK-31, Denver, CO 80202
- Faxed to: Transit Equity Manager at 303.299.2061
- Emailed to: [titlevicomplaints@rtd-denver.com](mailto:titlevicomplaints@rtd-denver.com)
- Complete the fillable form at: <https://www.rtd-denver.com/reports-and-policies/title-vi-policy>

Alternatively, a Reporting Party or Complainant may choose to submit a written statement to the Transit Equity Manager (by mail, fax, or email as indicated above) including the following:

- Complainant's or Reporting Party's name, address, telephone number and any other contact information (email, fax, etc.)
- The protected status of the complainant (race, color, national origin (including limited English proficiency), creed, sex, sexual orientation, gender identity, gender expression, marital status, disability, or ancestry)
- Date(s) on which the alleged discriminatory event(s) occurred
- Details of the incident(s)
- Names and contact information of witnesses
- Whether a complaint was filed with another agency, such as Colorado Civil Rights Division or the Federal Transit Administration, and the date filed

A Complainant or Reporting Party may also file a complaint by contacting a Customer Care staff member at 303.299.6000.

A representative may 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.

#### B. Intake

An intake should be completed when the Complainant or Reporting Party initiates contact with the agency through one of the above reporting mechanisms. An intake is the collection of essential information necessary to conduct investigations pursuant to this Procedure and is crucial for thorough and objective review.

Customer Care staff completing an intake shall do the following:

- Collect pertinent information provided by the Complainant and enter that into the Salesforce database
- Attach relevant and supporting information into Salesforce database
- Flag the Transit Equity complaint by checking the Title VI field in the Salesforce database to ensure accurate routing to the appropriate staff in the Transit Equity Office

- Inform the Complainant or Reporting Party to submit the External Civil Rights Complaint Form, when requested. The form can be submitted online, mail, email, or fax. The form may be completed on the phone by the Transit Equity Office, as needed

When Transit Equity staff receive a complaint through email, fax, or mail (i.e., Transit Equity mechanisms), the staff member shall complete the following:

- Forward customer complaint to Customer Care staff to be entered into the Salesforce database within three business days
- Contact Complainant or Reporting Party, if necessary, to gather more information or to clarify the allegations
- Determine whether the complaint shall be processed as an informal or formal complaint
- Initiate complaint tracking via the Transit Equity Civil Rights Complaint Tracker

#### C. Initial Assessment

Once a formal complaint is filed, the Office of Transit Equity will review the complaint and determine whether the agency has jurisdiction.

The Office of Transit Equity will conduct an initial review and assessment of all complaints to determine whether the complaint states sufficient allegations, if true, to establish a violation of the Transit Equity Nondiscrimination Policy. If so, then an investigation will be initiated to determine if a policy violation occurred. If the allegations in the complaint do not meet this standard, then the matter will not be investigated by the Office of Transit Equity but may be referred to another department or resource.

The Complainant or Reporting Party will receive a letter acknowledging receipt of the complaint, informing the Complainant or Reporting Party whether the complaint will be investigated by the Office of Transit Equity or another department and, if applicable, describing the next steps in the investigation. The acknowledgment letter shall be sent to the Complainant or Reporting Party no later than seven business days from receipt of the formal complaint.

#### D. Investigator Designation

The Manager of the Office of Transit Equity will investigate the complaint or designate a(n) Investigator(s) who has specific training and experience investigating allegations of discrimination. The Investigator(s) will provide a reliable gathering of the facts through a thorough, impartial, and fair investigation. To this end, any designated Investigator(s) must be impartial and free of any actual conflict of interest.

#### E. Investigation

The investigation will generally include interviews and/or meetings with the individuals identified as having relevant information. Each interviewee is informed of the purpose of the investigation, the role of the investigator(s) as (a) neutral fact finder(s), confidentiality of the review to the extent possible, and the expectation that all interviewees be truthful and forthcoming. Additionally, all interviewees are advised of the agency's prohibition against retaliation for participation in the investigation and/or making complaints under the Transit Equity Nondiscrimination Policy.

Each interview is captured in a summary statement/notes that are not intended to be verbatim. The interviewees are asked to ensure that the summary statement/notes are an accurate reflection of the conversation and are asked to revise as necessary and sign. For interviews conducted via phone or other means, an e-mail confirmation is sometimes used as an attestation of an actual signature. Lastly, all documentation provided in connection with each interview and all other relevant information is reviewed.

#### F. Timeframe

Unless the agency's Collective Bargaining Agreement governs the period for review of an External Civil Rights Complaint, RTD will make every effort to address and resolve all reports within 60 calendar days from the time they are received. This period may be extended as necessary 1) to ensure the integrity and completeness of the investigation; 2) to accommodate the availability of witnesses/interviewees; 3) to account for complexities of a case, including the number of witnesses; and 4) the volume of information provided by the parties; or 5) to address other legitimate reasons.

The agency's failure to meet any of the periods outlined within this Procedure in no case shall be grounds for dismissing any matter or review, nor shall it limit the agency's ability to complete an investigation, issue findings, impose corrective or disciplinary actions, or limit the agency's ability to take any other required administrative action under this Procedure.

#### G. Conclusion

In consultation with Legal Services and using the Preponderance of Evidence standard, the Investigator(s) shall make factual determinations; conclude whether there is a violation under the Transit Equity Nondiscrimination Policy, based upon those factual determinations; and if warranted, refer the investigative conclusion to the Respondent's supervisor and/or any other appropriate agency representative.

The Office of Transit Equity will issue a final closure letter to the Complainant or Reporting Party, indicating that the agency has reviewed their concerns and their complaint(s) were promptly investigated, as deemed appropriate, in accordance with the agency's policies and procedures. The letter will share whether remedial actions were taken, where warranted, but will not include any detail of such actions. This letter will not contain the summary of the findings or any personally identifiable information (PII) of staff. The letter shall be sent to the complainant no later than seven business days from the final determination.

The Respondent's supervisor and/or any other appropriate agency representative is responsible for addressing violations of policies and procedures, and imposing remedies designed to eliminate prohibited conduct and address its effects. Regardless of whether there is a violation of the Transit Equity Nondiscrimination Policy, the reviewed behavior may warrant educational outreach or other action by the appropriate agency representative.

#### H. Records

The Office of Transit Equity documents each report under this Procedure and will review and retain copies of all documents generated as a result of investigations consistent with the agency's record retention guidelines. These records will be kept confidential to the extent permitted by law.

#### I. Confidentiality

For any complaint made under this Procedure, every effort will be made to respect and safeguard the privacy interests of all individuals involved in a manner consistent with the need for a careful assessment of the allegation(s) and any necessary steps to eliminate the conduct, prevent its recurrence, and address its effects. To that end, information related to a complaint under this Procedure will only be shared with those agency employees who "need to know" to assist in the active response, review, investigation, or resolution of the report. These individuals will be discreet and respect the privacy of all individuals involved in the process.

#### J. Administrative Closures

The agency may administratively close transit equity nondiscrimination complaints before a resolution is reached in the following circumstances:

(1) The complainant decides to withdraw the case.

(2) The complaint was not filed within 180 days of the alleged discrimination.

- (3) The complaint has been investigated by another agency and the resolution of the complaint meets Federal Transit Administration regulatory standards.
- (4) The complainant fails to respond to a request to provide relevant information.
- (5) The complaint is incomplete or does not provide sufficient detail.
- (6) The complaint does not allege a possible violation of the agency's Civil Rights in Public Accommodations Policy.
- (7) The complaint allegations are foreclosed by previous decisions of the Federal courts; the Secretary; DOT policy determinations; or the U.S. DOT's Office of Civil Rights.
- (8) The complaint is a continuation of a pattern of previously filed complaints involving the same or similar allegations that the agency has found to be factually unsubstantiated.
- (9) The death or unavailability of the Complainant or Reporting Party makes it impossible to fully investigate the allegations.

## 5. External Reporting Resources

A Complainant or Reporting Party may file a complaint directly with the appropriate local, state, or federal agency including the Federal Transit Administration or the Colorado Civil Rights Division, within the agency's applicable time limits. Any person dissatisfied with the agency's Procedure outlined herein, or with the results of an investigation may seek redress through these means to the extent allowed by law.

## 6. REFERENCES

49 CFR Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation

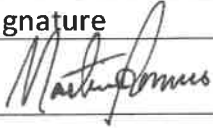
Transit Equity Nondiscrimination Policy, RTD-CIV-PLY-0004

Colorado Revised Statute § 24-34-601, Discrimination in Places of Public Accommodation

FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients

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

## REVISION BLOCK

Draft prepared by:			
Name	Signature	Position	Date
Martin Romero		Transit Equity Manager	November 7, 2023
Description of Revision(s): USDOT guidance and formatting			
Reviewed by: Debra Johnson, Leah Riley, Carl Green Jr., and Marques Barrington			
Information Governance and Management Division Acceptance: Patty Schmidt-Reed			
Version: B		Date issued: November 8, 2023	

# **RTD 2025-2028 Title VI Program**

## **Attachment E: Public Participation Plan**

DRAFT





# **Public Participation Plan**

2025 – 2028



DRAFT



**Regional Transportation District**

1660 Blake Street  
Denver, Colorado 80202

**[rtd-denver.com](http://rtd-denver.com)**



## Public Participation Plan

As a recipient of federal funding, and per Title VI of the Civil Rights Act of 1964, the Regional Transportation District (RTD) is required to submit a Public Participation Plan (PPP) to the Federal Transit Administration (FTA). The agency's PPP details the processes and strategies used to engage Black, Indigenous, People of Color (BIPOC) and linguistically diverse populations in transit planning and programming activities.

Updated:  
April 29, 2025

# Table of Contents

<b>1 Introduction</b>		<b>4 Historically Underserved Population Demographics</b>	
Executive Summary	6	Importance of Public Transportation	34
Acknowledgements	6	Demographic Profile Datasets	35
Agency Overview	7	Language Access	36
Mission, Vision and Values	8	Distribution of BIPOC Populations	37
Strategic Priorities and Initiatives	9	Distribution of Low-Income Populations (150% of Poverty Level)	38
<b>2 Public Participation Overview</b>		Distribution of Low-Income Populations (200% of Poverty Level)	39
Equity Framework	11	People with Disabilities	40
Committees and Stakeholder Groups	12	Distribution of Disabled Population	41
Public Participation Procedures		<b>5 One RTD Approach</b>	
Community Collaborations Workflows	15	Departments and Divisions	43
Agency-Led Projects Workflows	16	Roles and Responsibilities	44
Community-Based Organizations	17	<b>6 Appendix</b>	
<b>3 Strategies and Methods</b>		Implementation Timeline	48
Monitoring, Tracking and Reporting	19	Public Participation Case Studies	49
Plan Evaluation	21	Northwest Rail Peak Service Study	49
Guidelines and Considerations	22	Fare Study and Equity Analysis	50
Best Practices for Engaging Historically Underserved Populations	23	Zero Fare for Youth	51
Effective Communication with Persons with Disabilities	24	Proposed Service Changes	52
Language Access at RTD	25	Transit Assistance Grant	53
Language Access Tools	26	Reimagine RTD	54
Meeting Location and Structure	27	News Media Database	55
Public Input, Feedback and Meeting Types	28	Stakeholder Database	56
Survey Instruments	29	Acronyms	57
Public Communications	30	Glossary of Terms	58
Earned Media	31	Communications and Engagement Work Plan	60
Internal Trainings	32	Outreach Summary	63
		Event Attendance Rubric	64
		Event Attendance Rubric Workflow	65
		Federal and State Requirements	66
		Public Engagement Activities Jan. 2022 – Mar. 2025	68





## Introduction





## Executive Summary

RTD's Public Participation Plan (PPP) is a requirement of Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B *Title VI Requirements and Guidelines for Federal Transit Administration* recipients. Overseen by the Transit Equity Office, the PPP is required to be updated every three years along with the agency's Title VI Program Update. It ensures meaningful participation from Black, Indigenous, People of Color (BIPOC), historically underserved and linguistically-diverse populations in the public participation process. RTD's PPP is designed to ensure accessible and equitable participation in public engagement activities from all individuals within its service area. A summary of federal and state requirements can be found in the Appendix.

Project managers from RTD's Communications and Engagement Department convened a cross-disciplinary team to identify best practices and create this plan. The team collaboratively identified federal requirements, examined existing policies and procedures and reviewed similar plans at other U.S. transit agencies, including LA Metro in Los Angeles and WMATA in Washington, D.C.

**The plan outlines the RTD's current outreach methods and community engagement activities and establishes a timeline for implementing new strategies, methods and procedures.**

## Acknowledgements

Effective and meaningful community engagement requires continuous relationships with RTD's customers, partners and community groups. RTD acknowledges that many individuals helped shape this public participation plan. The agency expresses its most sincere appreciation for the community's input and support as it strives to make lives better through connections.

Additionally, the following RTD staff members provided substantial contributions, expertise and feedback in the creation of this document:

### General Manager and Chief Executive Officer

Debra A. Johnson

### Project Managers

Brandon Figliolino

Gabriel Martinez

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## Agency Overview

The Colorado General Assembly created the **Regional Transportation District** (RTD) in 1969 to develop, operate and maintain a mass transportation system that now benefits more than 3.1 million people in the Denver metro area. With a service area of 2,345 square miles, RTD provides bus, rail, on-demand and paratransit services in all or part of eight counties and more than 40 municipalities. The agency's services are delivered via 126 bus routes, six light rail lines, four commuter rail lines and paratransit and on-demand mobility options.

RTD headquarters in Denver and has divisions throughout the service area. A publicly-elected Board of Directors governs it. Each of RTD's 15 Directors represent a geographic district of approximately 200,000 constituents and serve four-year terms.



### Service Area

3.1 million people  
2,345 square miles  
40+ municipalities

### Serving all or part of eight counties

Boulder Broomfield Denver  
Jefferson Adams Arapahoe  
Douglas Weld



### Bus

85 local routes  
12 regional routes  
5 airport routes  
1,028 vehicles  
344 Access-a-Ride vehicles  
58 FlexRide vehicles  
9,720 stops



### Fixed-Route Miles

135,495 scheduled (weekday)  
60,532,485 operated (annually)



### Employees (FY 2025)

**3,637 Total**  
2,336 Represented  
1,301 Non-Represented



Only **multi-modal transit agency** in Colorado



### Park-n-Rides

48



### Light Rail

6 lines  
200 vehicles  
60+ miles of track  
57 stations

### Commuter Rail

4 lines  
66 vehicles  
54+ miles of track  
27 stations



### Number of Engagement Activities

853

### Number of Individuals Engaged

590,000

\*Activities from Jan. 1, 2022 through  
December 31, 2024

### STANDARD FARES

3-Hour Pass	\$ 2.75
Day Pass	\$ 5.50
Airport Day Pass	\$ 10.00
Monthly Pass	\$ 88.00

### DISCOUNT FARES (includes Airport Fare Zone)

3-Hour Pass	\$ 1.35
Day Pass	\$ 2.70
Monthly Pass	\$ 27.00

**2021**

**49,033,000**  
BOARDINGS

**2022**

**61,603,000**  
BOARDINGS

**2023**

**65,175,000**  
BOARDINGS

**2024 Jan - Oct**

**55,209,000**  
BOARDINGS



# Mission, Vision, and Values

## Mission

**We make lives better through connections**

## Vision

**To be the trusted leader in mobility, delivering excellence and value to our customers and community**

## Values

### Passion

We will be purposeful in delivering our work.

### Collaboration

We will approach our work in a collaborative manner, seeking and acknowledging valued input from our colleagues and the community.

### Diversity

We will honor diversity in thought, people and experience, being receptive to unique ideas and viewpoints to achieve optimal results in problem-solving.

### Respect

We will demonstrate respect and integrity in our interactions with both our colleagues and community members.

### Ownership

We will commit ourselves to continuous learning and do what it takes to deliver our shared vision.

### Trustworthiness

We will be forthright in our actions; we will do what we say, when we say we will do it.





## Strategic Priorities and Initiatives

### Strategic Priorities

RTD's four Strategic Priorities guide the development, evaluation and measurement of the agency's overall performance throughout the life cycle of the 2021-2026 Strategic Plan.



#### Community Value

RTD strives to be a strong community partner, providing value to customers as well as to the broader Denver metro region while sustaining planet Earth.



#### Customer Excellence

RTD strives to consistently deliver high-quality customer service.



#### Employee Ownership

RTD seeks to attract and retain a highly skilled and engaged workforce.



#### Financial Success

RTD takes very seriously the management of all financial resources.

### Strategic Initiatives

The agency's Strategic Initiatives reflect a collective focus on delivering meaningful progress toward the Strategic Plan's established success outcomes. These four initiatives have been interwoven into the RTD's budget and work plans created by employees throughout the agency.



#### Back to Basics

RTD strives to enhance the reach and impact of internal communications and to redouble agency efforts to maintain assets in a state of good repair leveraging sound asset management principles.



#### People Power

Recognizing the critical importance of its people, the agency's most important resource, in achieving the agency's mission, RTD seeks to vigorously address impediments to recruitment and retention efforts and to foster a culture of learning and development.



#### Welcoming Transit Environment

RTD seeks to reduce the impacts of criminal behaviors and Code of Conduct violations on agency services and workplaces and, in doing so, to improve community and employee perception of personal and public security on RTD property and vehicles.



#### Customer and Community Connections

RTD actively fosters community-building and enrichment of the customer experience.



## Public Participation Overview



# Equity Framework

**RTD is committed to embedding equity in its public participation and decision-making processes.**

RTD created an Equity Framework to support the agency's public engagement activities with BIPOC, linguistically diverse, disabled and low-income individuals. The framework's eight key components guide all outreach efforts. The Equity Framework aims to improve transit services for these communities while fostering greater trust and collaboration.

1

## Deliver Equitable Access to Transit Services

Ensure fair and equitable access to RTD's services and programs for all populations served by RTD, particularly individuals who are underserved. This includes addressing gaps in service availability, accessibility, quality, affordability and access to information.

2

## Collect Data on Community Composition

Identify and map underserved populations. Design outreach activities that address their specific transit needs.

3

## Collaborate with Community-Based Organizations

Partner with local community-based organizations (CBOs) to foster robust engagement with underserved populations. These organizations serve as intermediaries, helping RTD connect with hard-to-reach communities and ensuring their voices are represented in decision-making.

4

## Ensure Participation in the Decision-Making Process

Engage communities, particularly underserved, at every stage of the transit decision-making process. Incorporate their public feedback into agency policies and plans.

5

## Build Trust

Strengthen relationships between RTD and all populations it serves by maintaining consistent, transparent communication and showing how public input directly informs transit decisions and outcomes.

6

## Incorporate Engagement Recommendations in Analyses

Implement recommendations for engaging underserved populations as outlined in RTD's existing equity analyses for fare changes, service changes and facility siting. Pursue additional public participation when agency decisions may disproportionately affect underserved communities.

7

## Integrate Language Access and Accessibility Principles

Assist and provide necessary modifications for linguistically diverse individuals and people with disabilities to ensure their full and equitable participation. Develop communication materials and outreach efforts that are culturally sensitive, reflecting the norms, languages and preferences of the populations served.

8

## Provide Internal Support and Improve Accountability

Incorporate civil rights best practices for public participation into outreach activities, with support from RTD's Transit Equity Office and Americans with Disabilities Act Office. Explore the establishment of key performance indicators to track equity-informed outcomes in future public participation efforts.



## Committee and Stakeholder Groups

RTD maintains and facilitates several committees and working groups to collaboratively identify service delivery challenges and solutions. RTD offers meeting agendas and materials in alternative formats, when requested. Live captioning and language interpretation are also available.

### Advisory Committee for People with Disabilities

RTD's ADA Office facilitates the Advisory Committee for People with Disabilities (ACPD). Quarterly meetings vary between virtual and in-person meetings at the agency's Blake Street office. There are 13 members.

The committee provides feedback on accessibility-related issues regarding RTD's programs, services and facilities, all which must be fully accessible to people with disabilities.

Individuals apply to ACPD via an application detailing their interest in the committee and their goals for participation. Responses are anonymized and reviewed by the ACPD Steering Committee, which evaluates and ranks applicants. The ADA Manager reviews the rankings and selects members based on score weightings and available membership slots.

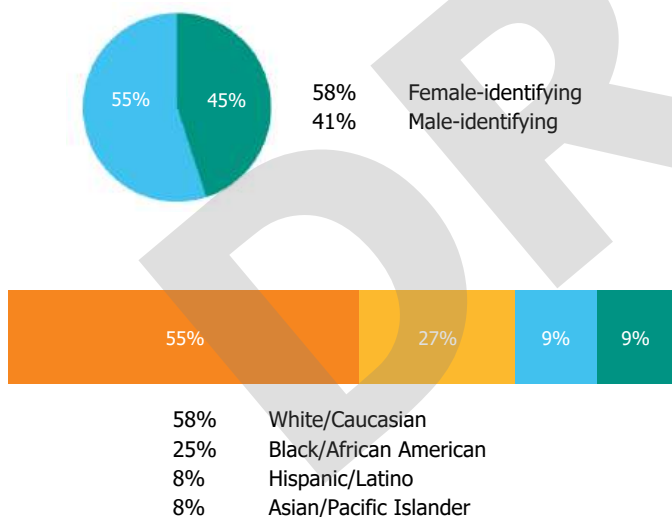
### Access-a-Ride Paratransit Advisory Committee

The Access-a-Ride Paratransit Advisory Committee (APAC) meets six times per year and is assisted by an external facilitator. Meetings are virtual, with in-person meetings taking place only to address physical issues such as vehicle procurement. There are 13 members.

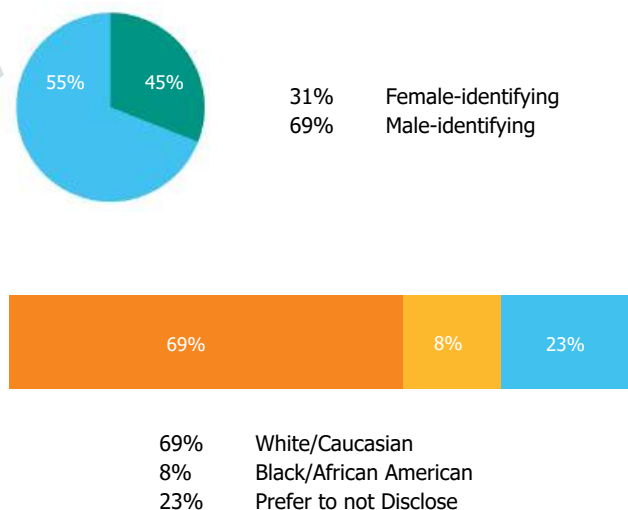
APAC provides feedback and advises RTD on issues and concerns related to paratransit services and its operation. APAC applications are open year-round, with rolling three-year terms. RTD recruits via targeted outreach to assisted living centers, schools and advocacy organizations to ensure balanced individual and organizational representation.

RTD and community-based organizations jointly facilitate ACPD and APAC member recruitments to ensure historically underserved populations are represented.

**ACPD – 2024 Demographics**



**APAC – 2024 Demographics**



## Committee and Stakeholder Groups

### Citizen Advisory Committee

The Citizens Advisory Committee (CAC) provides direct feedback to the RTD Board of Directors on public transit and customer concerns. Areas of feedback include operations, preventative maintenance projects, new capital projects, customer communications and state and local transportation legislation.

The CAC has 17 seats comprised of residents and businesspersons from around the district, each appointed by the Board of Directors. Members serve for a maximum of two, three-year terms, with approximately one-third of the committee's 17 seats up for appointment each year. Members receive a monthly pass to access RTD's services in recognition of their time commitment.

RTD promotes CAC membership through extensive outreach, including emails to 150+ organizations, a news release to major media outlets and distribution to 670 contacts, including Transportation Management Organizations (TMOs), public information officers and media subscribers.

### Subregional Service Councils

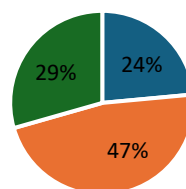
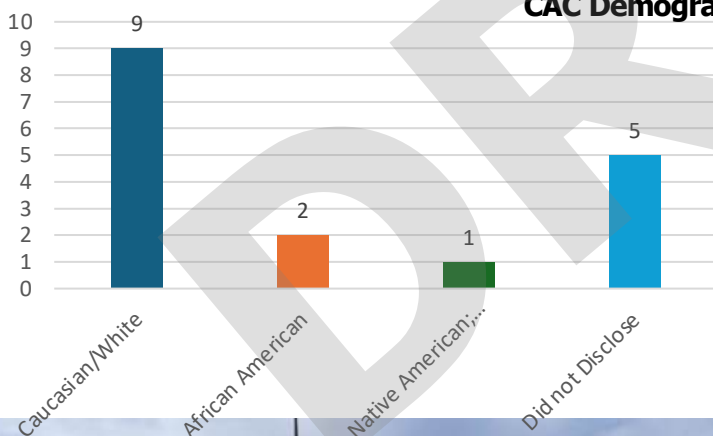
In 2022, RTD established Subregional Service Councils (SSCs) to more directly engage with local stakeholders on matters related to service planning and local transportation issues. Based on transit travel sheds, the councils split the RTD district into five separate subareas: Southwest, Southeast, Northwest, Northeast and Boulder County.

The councils provide a forum for dialogue about the agency's services and any related concerns or opportunities. Meetings typically occur quarterly. Membership includes local jurisdiction staff, transportation management organizations, transit advocates and non-profits that represent RTD's customers. The agency specifically included transit advocates and non-profit organizations to have a more diverse representation on the SSCs. This ensures that underserved populations have a voice in the planning of RTD's services.

### Customer Feedback Panels

Every year, RTD recruits 15 customers to participate in quarterly panel discussions regarding topics pertinent to RTD. Participants receive a free monthly pass for each panel in which they participate. RTD's software vendor recruits panel participants to ensure diverse representation.

**CAC Demographics (2024)**



■ Female-identifying ■ Male-identifying ■ Did not Disclose





## Public Participation Procedures





## Community Collaboration Workflows

The agency categorizes its public participation activities as either community collaborations or agency-led. Community collaborations are activities requested by community organizations and stakeholder groups. Projects initiated and managed in-house are agency-led. While the workflows used and best practices deployed may differ, both public engagement categories aim to increase awareness of RTD services and initiatives.

### Community Collaborations

Many community-based organizations, local governments, school districts and neighborhood organizations recognize the value that RTD provides the Denver Metro Area. Requests for RTD to participate in various activities, including presentations, forums and community events, have steadily increased over the past three years. The agency strives to work alongside community partners to provide meaningful engagement and education to community members, especially those who are underserved.

Requests for RTD to attend or collaborate on a presentation, project, or event come in many forms, including:

- Online "[Request an Appearance](#)" form
- Emails to the Board of Directors, agency staff or [CommunityEngagement@rtd-denver.com](mailto:CommunityEngagement@rtd-denver.com)
- Phone calls to Customer Care or staff
- In-person connections at community events

### Requests for Collaboration Workflows

The process for evaluating and executing community collaboration requests varies based on the work unit. Generally, the staff member who receives the requests assesses the potential impact of the collaboration. If staff choose to participate, they take ownership of the activity and coordinate with the community partner to execute it. For public events, they add the activity to RTD's online Community Calendar. All completed activities are shared in the monthly Board of Directors Customer and Community Connections Update.

### Internal Community Engagement Working Group

To foster collaboration and communication internally, each work unit that conducts public engagement tries to have a representative join the monthly community engagement standing meeting. During these meetings, team members share upcoming activities for the month, seek advice, and request additional support or resources.

### Event Attendance Rubric and Minimum Basic Thresholds for Community Collaborations

Many of RTD's community outreach activities are the result of an invitation on behalf of a community of interest, such as assisted living centers, places of worship, non-profits or schools. Given the high demand for RTD's presence in the communities it serves, Community Engagement developed an Event Attendance Rubric (EAR) to assess community requests for collaboration. The EAR sets a standardized process and tool for evaluating requests with a priority on supporting requests that increase the agency's ability to connect with historically underserved populations. When received, the manager of community engagement assigns the request to a community engagement specialist to evaluate. If the specialist determines that participation is warranted, they become the project owner and are responsible for developing an outreach activity work plan and collaborating with relevant internal and external stakeholders to execute the activity.

If an event scores low on the EAR, the team member assigned to the EAR review connects with the organizer to get more information and to determine if modifications could increase the value of RTD's participating. If RTD ultimately declines to participate, an organizer can request the Chief Communications and Engagement Officer review the decision.

Organizations interested in partnering with RTD should ensure their request for collaboration form is well-detailed to help staff better evaluate the merits of the activity.

### Future Process for Evaluating Requests

RTD intends to standardize the process for evaluating, responding to and executing community requests for collaboration. Doing so will ensure the consistent execution of engagement programming across the agency. An implementation timeline is included in the appendix.



## Agency-Led Public Participation Activities

### PPP-Compliant Projects

Any number of RTD projects could require compliance with the agency's plan. Project managers consider the impacts a project may have, especially on historically underserved populations. Projects that initiate PPP compliance may include:

- Amenities, environmental, and infrastructure changes – Examples include new systems and structures that impact facility access or customer behaviors; fare media or purchasing changes; and any project that requires National Environmental Policy Act (NEPA) review.
- Policy alternatives and fare changes – Proposed changes to policies or fares that impact customers.
- Public information and notification – Required and/or planned construction work that impacts customers and community members, such as facility upgrades, long-term detours, and city or county construction projects that are around a RTD bus stop, rail station, or park-n-ride facility.
- Service changes – Three times a year, RTD implements changes to its service that may include adjustments to service spans or frequencies, route modifications and schedule timing adjustments.

### Current Communications and Engagement Process for Agency-Led Projects

Many teams at RTD perform public engagement activities when executing an agency-led project. Each project manager is responsible for assembling a project team comprised of internal stakeholders and subject matter experts (SMEs). The project team, which may include staff from contracted firms, manages the project from conception to completion.

Currently, there is no standard process for executing agency-led public participation projects. Project managers and their teams have discretion on what methods and strategies to employ based on the project's specific goals. The Communications and Engagement Department strongly encourages all teams conducting outreach to develop comprehensive communications and engagement work plans. A template is available in the Appendix.

The project manager, or their designee, adds any public engagement activities to the RTD Community Calendar. Once a public engagement activity concludes, they or their designee inputs information about the activity in the monthly Board of Directors Customer and Community Connections Update.

The following metrics are captured and inputted into the tool:

- Name of event
- Host organization (if not RTD)
- Location
- Number of people engaged
- Topic(s) of discussion
- Work units who supported the activity

## Community-Based Organizations

RTD recognizes the vital role community-based organizations (CBOs) play in engaging historically underserved populations. To strengthen collaboration and build trust, RTD prioritizes partnerships with CBOs, ensuring ongoing involvement with these populations and making sure RTD's outreach is truly community-driven.

### Current Process

RTD provides CBOs with support, including informational sessions, technical training and, in some instances, financial assistance through grant programs such as the Transit Assistance Grant (TAG) program. Co-creating public participation activities with CBOs is central to this approach, allowing for flexible and culturally relevant engagement methods such as pop-up events, participatory workshops and digital outreach.

The strategy also emphasizes the importance of digital and virtual engagement, with RTD collaborating with CBOs to host virtual webinars and social media campaigns that reach a broader audience. CBOs are provided with toolkits (usually bilingual but sometimes with many languages, depending on the target linguistically diverse population) to support sharing of RTD information and public participation opportunities.

The multicultural outreach and engagement services (MOES) contract (2023–2024) partnered with CBOs to connect with diverse groups, support fare programs and facilitate engagement.

### Future Process and Best Practices

To maintain transparency, RTD will explore establishing a feedback loop, ensuring that CBOs and their communities receive regular updates on how their input influences decision-making. RTD would also like CBOs to play an active role in evaluating the agency's public participation efforts, learning from each project to continuously improve the process. In addition, RTD will explore opportunities to implement formalized community-based programs.

The Cultural and inclusive language access community engagement services (CILACES) contract (2025–2027) will expand efforts that focus on linguistically diverse and underserved populations. The contract strengthens community ties, promotes inclusivity and ensures equitable participation in RTD programs and services.







## Strategies and Methods



## Monitoring, Tracking, and Reporting

### Monitoring and reporting strategy

To ensure engagement leads to positive outcomes for historically underserved populations, RTD takes a structured approach that includes feedback collection, impact measurement and continuous reporting. These efforts align with inclusive participation per ADA and Title VI regulatory compliance requirements.

### Engagement and service Feedback Principles

RTD prioritizes the collection of feedback regarding accessibility and other services through the following channels:

**Actionable outcomes and service improvements:** RTD analyzes feedback to identify actionable outcomes that drive service or policy changes benefiting all customers. RTD uses feedback it receives to monitor improvements in accessibility, service delivery, and customer satisfaction for BIPOC, individuals with disabilities, and linguistically diverse populations.

**Ensuring intentional and focused engagement:** RTD strives to ensure that at least 30% of its annual community engagement activities occur at events serving and appealing to diverse racial, ethnic, linguistically diverse communities and persons with disabilities. These events provide platforms to engage protected populations in culturally relevant settings.

**Feedback:** RTD gathers feedback through surveys, feedback forms, community forums and other platforms. RTD ensures the accessibility of these channels including individuals from diverse racial, ethnic, disability and linguistic backgrounds. This includes designing feedback channels to collect input from protected populations in inclusive ways.

**Tracking participation:** RTD tracks participation at public forums, outreach activities and other engagement events through voluntary post-event surveys. Collecting consensual demographic data ensures diverse representation from all protected groups, helping to identify service needs across racial, ethnic, disability and linguistic populations. RTD ensures accessibility through interpretation services, multilingual materials, and accessible formats to ensure that no one is excluded based on race, national origin or disability status.

**Quality principles:** RTD assesses the quality of feedback collection by measuring the responsiveness and impact of the actions taken based on community input. The quality of feedback collection will be measured by:

- Response time
- Satisfaction with resolution
- Engagement effectiveness
- Feedback relevance



## Monitoring, Tracking, and Reporting

### Vendor and Partner Principles

**Diversity and inclusivity:** RTD strives to ensure that its vendor and partner network includes BIPOC-owned, women-owned, disability-focused and linguistically diverse organizations. Vendor relationships will reflect RTD's commitment to non-discrimination, equity and access.

**Partnership tracking:** RTD tracks partnerships with disability advocacy organizations, ADA-compliant service providers and other groups representing protected populations, including linguistically diverse organizations.

### Impact Principles

**Accessibility improvements:** RTD tracks accessibility improvements, such as the increase in the number of accessible bus stops, infrastructure improvements and modifications that support people from diverse backgrounds.

**Community satisfaction:** RTD uses survey findings and feedback to determine whether services have become more accessible and if the needs of underserved communities have been addressed.

**Impact on underserved populations:** RTD evaluates the impact of its improvements on BIPOC, individuals with disabilities and linguistically diverse communities. RTD will track service modifications' impact on reducing barriers and measure outreach effectiveness to ensure these populations are heard and supported in service delivery.

**Service equity and inclusivity:** RTD evaluates whether the improvements in accessibility benefit historically underserved populations. These evaluations ensure that changes lead to more inclusive and equitable transportation options, emphasizing aspects where underserved populations are most in need.



### Future monitoring, tracking, and reporting

RTD recognizes that intentional and focused community engagement, particularly for individuals with disabilities, BIPOC communities, linguistically diverse communities and other protected groups, is essential to the agency's continuous improvement. With the adoption of this PPP, RTD aims to standardize tracking and reporting of engagement activities across work units.

To strengthen this commitment, RTD will develop key indicators and implement strategies to monitor engagement and assess its impact. This will allow RTD to foster meaningful interactions that inform enhancements in services and support for all historically underserved populations.

Review the timeline in the Appendix for additional details.





# Plan Evaluation

Objective	Action	Goals	Key Performance Indicators	Growth Strategy
Methods and Information				
Conduct community outreach to historically underserved populations	Conduct community engagement activities that are accessible	100% of outreach activities conducted within 100 yards of an RTD bus stop, Park-n-Ride, or rail station	100% of outreach activities conducted within 100 yards of an RTD bus stop, Park-n-Ride, or rail station	Ensure all outreach activities in <b>[next time period]</b> occur within 100 yards of RTD stop/station
		30% of RTD’s annual community engagement activities occur at events serving and appealing to diverse racial, ethnic, linguistically diverse communities, and persons with disabilities.	30% or more of RTD’s community engagement activities occur at events serving and appealing to diverse racial, ethnic, linguistically diverse communities, and persons with disabilities.	Connect with CBOs to identify potential activities for RTD to join.
	Make activity information-including marketing and promotional materials-accessible to participants	100% of activities accessible to ADA populations	100% of activities accessible to ADA populations	Maintain high level of ADA accessibility over <b>[time period]</b> .
		100% of outreach materials translated into key languages, as defined by RTD’s Language Access Plan, as needed	75% of outreach materials translated into all applicable languages as defined by RTD's Language Access Plan (LAP), as needed	Increase outreach translation materials into all applicable languages 5% by next <b>[time period]</b> , as needed.
		75% of activities use multi-lingual media and staff	53.9% of activities used multilingual staff in <b>[time period]</b>	Increase presence of multilingual staff at outreach activities by 5% overall, by <b>[time period]</b>
		75% of outreach materials developed 2 weeks before date of outreach activity	65% of outreach materials developed 2 weeks before date of outreach activity	Increase average amount of outreach materials published 2 weeks prior to the event by 5%
Participation and Activity Feedback				
Match participation rates to project demographics	Conduct well-attended engagement activities	Participation rates should average 80 - 90% of projected attendance	The average participation rate reached 72% of projected attendance over <b>[time period]</b>	Increase the average participation rate 5% by <b>[time period]</b>
Evaluate and record outreach efficacy	Ensure historically underserved populations’ participation corresponds to community composition	100% of outreach activities are accessible to historically underserved populations	56% of outreach activities attended by historically underserved populations <b>[time period]</b>	
	Participants report positive community outreach experience including opportunities to provide input or feedback	100% of outreach activities provide opportunities to receive or collect feedback from participants		
	Record key lessons learned from outreach process	100% of outreach activities are summarized and recorded for future reference		
Continuation				
Provide an opportunity for community engagement participants to receive additional information about the event/activity and provide feedback	Record outreach results, inform key stakeholders of any notable outcomes	100% of outreach activities summarized and recorded for future reference	95% of outreach activities summarized and recorded for future reference	



## Guidelines and Considerations

To ensure greater and more meaningful public participation from RTD's customers and stakeholders, especially those who are historically underserved, the RTD team utilizes the following guidelines and considerations when supporting or leading public engagement activities:

- Creating consistent communications and feedback processes through the duration of a project
- Ensuring that customers, community members and stakeholders are given ample time to comment on projects
- Establishing an advance-planning team made up of internal SMEs to identify anticipated issues from various stakeholder positions
- Identifying a range of outreach activities that can inform members of diverse communities of new or ongoing projects and programs, or provide educational opportunities to learn how to utilize RTD services
- Identifying public engagement goals and sharing those goals with the community participants
  - For example, is the intent of the engagement to collaborate, consult or inform the community about a project?
- Identifying the potential uses of online communication, including websites, online advertisements and social media, while ensuring that communication and engagement work plans take into consideration individuals and households who may have limited access to or challenges using electronic devices
- Measuring public engagement and adjusting communications and engagement work plans by monitoring performance metrics
- Utilizing additional data resources beyond RTD's Language Access Plan (LAP) to advance the effectiveness of outreach planning in diverse communities

### Current Process

The assigned project manager, in collaboration with their team, is responsible for evaluating and determining the most effective methods for involving the public in the decision-making process. The project teams are generally cross-disciplinary and may include individuals from Civil Rights, Communications and Engagement, Planning, Service Development and Bus and Rail Operations.

Public participation methods selected by the project manager and team are adjusted to fit the project audience, goals and objectives.

These project teams also identify, design and implement ongoing communication methods that engage RTD customers and increase opportunities for expanded participation in the engagement process. The project manager, with support from their team, may develop a communications and engagement work plan based on their respective work unit's procedures.

### Future Process

RTD will establish a standard operating procedure for performing agency-led public participation.



# Best Practices for Engaging Historically Underserved Communities

The following list includes best practices for engaging with all populations, particularly those who are historically underserved.

- Acknowledge past harms: Approach communities with respect and humility
- Advocate for institutional change: Ensure that engagement efforts lead to agency decision-making that benefit historically underserved communities
- Prevent power imbalances: Follow principles like the Jemez Principles for Democratic Organizing to create fair and inclusive engagement
- Share decision-making power: work with communities to co-create solutions that address their needs
- Be transparent: demonstrate how public feedback influences decisions
- Follow up: Do not just collect input; share results, next steps, and how input was used
- Compensate community participation: Pay or incentivize community members for their time and participation
- Use multiple outreach methods: Share information in plain language and place it in community spaces like schools, clinics, local stores and civic groups
- Provide language assistance: Translate outreach materials and offer interpretation during public meetings in the languages spoken in the community
- Ensure accessibility and inclusion: Host meetings in ADA-compliant, transit-accessible locations, and partner with individuals with disabilities and disability-focused organizations
- Provide accessible information: Develop materials in alternative formats such as large print, don't rely solely on visual imagery and proactively hire a sign language interpreter for public meetings, in addition to other reasonable accommodations
- Offer flexible engagement opportunities: Schedule meetings at different times, such as evenings and weekends. Provide various ways to give feedback, including in-person and virtual meetings, online comment portals or email
- Hire a community or cultural liaison: Employ or contract individuals from the communities to build psychological safety and help communities engage openly, meaningfully and in ways that are culturally relevant
- Advertise surveys widely: Promote online surveys through printed materials at public places and on social media in the community's languages
- Leverage multicultural and multilingual media: Partner with local newspapers, radio stations and online platforms that serve diverse audiences
- Avoid one-size-fits-all strategies: Meet communities where they are — attend community events, go to gathering places and use the social media platforms they frequent most
- Create safe spaces for engagement: Hold small focus groups to support open, honest discussions
- Build long-term relationships: Engage with communities continuously
- Work with trusted organizations: Partner with local nonprofits, faith-based groups and community organizations with strong local ties





## Effective Communication with Persons with Disabilities

RTD commits to upholding 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 communications on an equal basis and without discrimination.

Under the ADA, RTD furnishes appropriate auxiliary aids and services where necessary to afford qualified individuals with disabilities, including applicants, participants, companions and members of the public, an equal opportunity to participate in, and enjoy the benefits of, a RTD service, program or activity.

When a customer requests an auxiliary aid or accommodation, RTD gives primary consideration to the choice expressed by the individual with the disability. RTD will honor the choice unless it can show:

- that another effective means of communication is available;
- that the use of the means chosen would result in a fundamental alteration in the service, program or activity; or
- that the use of the means chosen would result in undue financial burden.

RTD consults with the individual with a disability to identify an effective manner of communication that can be achieved with the individual in the context of the agency's program, service or activity. RTD does not require an individual with a disability to bring another individual to interpret for them.

RTD recognizes that no single means of communication will be suitable to engage all audience members. As a result, RTD strives to meet communities where they are by attending community events, visiting gathering places and using the social media platforms that communities use the most.

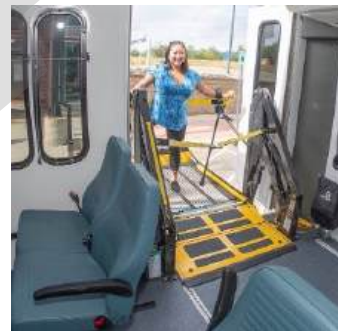


## Language Access at RTD

In accordance with Title VI, RTD must ensure that linguistically diverse individuals have meaningful access to its services, programs and activities, including opportunities for public engagement.

Aside from these regulatory obligations, the pursuit of improved language accessibility aligns with the agency's commitment to equitably providing public transportation services to all members of the community and visitors to the Denver metro region.

While language access is integral to the agency's public participation efforts, this section does not capture the full scope of language access efforts at the agency. Please refer to [RTD's LAP](#) to learn more about the demographic data related to language as well as RTD's approach to achieving language accessibility.






## Language Access Tools

The resources and tools available to support language assistance across public engagement activities have greatly expanded in the 2022 – 2025 period as RTD has increased its focus on language access. The following is a list of digital and physical tools used to support language access when pursuing public participation activities. Please note that this is not an exhaustive list and does not include the names of all the translated materials the agency has available.

An asterisk (\*) denotes tools available in both digital and physical formats.

<b>Digital</b> 	rtd-denver.com translation widget available in Spanish, Vietnamese, Simplified Chinese, Russian, with more languages planned
	Next Ride trip planning app (Spanish, Korean, Vietnamese, Simplified Chinese, Russian)
	Phone apps, such as Google Translate, Microsoft Translator or Deepl
	Language Access Program webpage
	Instructions for accessing a telephonic interpreter
	Best Practices Quick Reference Guide for Communicating with Non-English-Speaking Customers
	Best Practices Quick Reference Guide for Working with an Interpreter
	How to Ride video (3 languages)
	Best Practices Quick Reference Guide for Communicating with Non-English-Speaking Customers
	Project- and campaign-specific translated social media assets
	Language access icon to indicate availability of language assistance
	Section on Transit Equity Office Hub (internal) webpage to share resources on language assistance with staff
	Communication Access Realtime Translation (CART) available at RTD Board of Directors meetings, with automatic translation into Spanish. Additional language translations available upon request
<b>Physical</b> 	Basic Spanish for RTD Employees Handbook*
	"I Speak" Language Identification Card* (21 languages)
	Pocket-sized "I Speak" Language Identification Card* (21 languages)
	Customer Resources wallet-sized card (English, Spanish)
	How to Ride Guides (26 languages)*
	Language access bus interior signage (3 languages)
	Service and fare changes vehicle and station signage (English/Spanish)
<b>Other</b> 	Telephonic interpretation available via Customer Care at 303.299.6000
	Serving Non-English-Speaking Customers frontline staff training
	Contracts/relationships with various translation and interpretation firms
	Preference for hiring bilingual/multilingual staff in community-facing roles
	Expanded outreach to multilingual, multicultural and immigrant- and refugee-centered organizations
	"Multicultural Outreach and Engagement Services" contracts with CBOs
	Process for providing interpretation services upon community request

## Meeting Location and Structure

RTD takes special consideration when deciding where to host agency-led public engagement activities. The criteria for choosing a venue depends on the type of activity conducted; hosting an information table at a festival will have different space needs than an open house with various information stations, for example.

Meeting planning take into consideration historically underserved community members as well as people with disabilities who have varied work and family schedules. Meeting times and venues are selected to allow for the greatest possible participation of diverse groups.



### Venue Selection Guidelines

RTD chooses meeting venues based on several criteria including the following:

- The ADA Office verifies that the venue is accessible.
- Venues are reachable by public transport and include designated accessible parking spots, adequate curb cuts and ramps and functioning elevators, if applicable
- The venue provides technology infrastructure for presentations and live captioning, if necessary
- Facility hours of operations correspond with nearby transit service hours to support the attendance of transit-reliant communities

By adhering to these guidelines and adequately budgeting for these services, RTD creates an inclusive environment for all participants regardless of ability.

### Tactics for Promoting Inclusion

After a venue is selected, RTD implements the following tactics to encourage participation from all community members, including those who have disabilities or are linguistically diverse, by:

- Informing the public about available accommodations through press releases, promotional materials and the inclusion of local disability groups, TMA/Os and CBOs on communication lists
- Placing easy-to-identify signage with directional information strategically around the meeting location.
- Propping open doors to ensure easy access for customers with mobility devices, for indoor activities
- Providing various aids to assist communication for those with disabilities, including but not limited to offering large print materials, assisted listening devices, and sign language interpreters

## Public Input, Feedback and Meeting Types

**RTD values direct interactions with customers, community members, and stakeholders.**

The following types of meetings strive to foster direct interactions with stakeholders.



**Advisory committees** provide opportunities for constituents and stakeholders to offer input and/or resolutions to ongoing projects/issues



**Community meetings** involve elected officials, members of the public, and community-based organizations to discuss environmental impacts



**Community tours** include visits to RTD facilities and tours of transit operations



**Design meetings** solicit input from the public on project design



**Presentations** offer opportunities to convey information about RTD projects, activities, etc. to the public or specific groups



**Public meetings** introduce the public to proposed projects and plans, provide opportunities for public feedback and comment, proposed service changes and more issues affecting customer experiences. Public meetings are held either in-person at RTD facilities and other public venues or online via video conference technology



**Tabling events** are community outreach activities conducted in collaboration community partners or other local organizations



**Workshops** are interactive outreach activities or events designed to address a problem or enhance skills

### Soliciting Feedback

RTD solicits and receives public input and feedback in a variety of ways, depending on the target audience and project needs. The table below outlines suggested tools and methods to engage stakeholders and the community.

Tool or Method	Number of Participants	Feedback Type and Use
Interviews	Individual or Small Group	Learning about individual perspectives on specific issues
Focus Groups	Small Groups (15 or less)	Understanding and exploring attitudes, opinions, and perceptions
Customer and Community Advisory Groups	Small (5-20)	Information-sharing, questions, and back-and-forth dialogue
Public Outreach Meetings	Large Groups	Presenting information, sharing updates, and receiving comments or feedback
Online or Paper Forms and Surveys	Unlimited	Receiving direct and focused feedback from individuals at their convenience
Board of Director Meetings	Individual	Providing written or verbal comments as part of public meetings





## Survey Instruments

RTD collects survey data from customers to help identify opportunities to improve the customer experience and delivery of transit services.

### Customer Access and Accessibility

**Engagement Survey** Conducted by the ADA Office, this survey gathers feedback to help the agency better understand the experiences and needs of customers with disabilities.

### Customer Excellence Survey

Annually conducted by RTD, this intercept survey gathers feedback from customers to determine satisfaction with bus, rail and paratransit operations. Results identify areas for improvement and ensure RTD meets of customers and the community.

### Community Value Surveys

This survey assess satisfaction with RTD's operations, service quality and overall perceived value to the region.

### Language Access Customer Survey

Conducted by the Transit Equity Office, this survey is designed to better understand the experiences and needs of customers whose primary language is not English.

### On-to-Off Onboard

#### Transit Passenger Survey

This survey is designed to collect data by counting passengers getting on and off buses or trains at various stops, alongside additional onboard surveys to gather information about customer demographics, travel patterns and satisfaction levels while using transit.



## Public Communications

RTD employs multiple earned, owned and paid media methods to effectively share information with the public and encourage engagement.

### Advertising

The agency uses digital, out-of-home and traditional advertising to educate customers about upcoming projects.

### Earned Media and Owned

The Public Relations work unit regularly sends out news releases and posts online alerts to inform customers about upcoming or ongoing projects. These earned media opportunities also share ways for the community to learn more, get involved or provide feedback. Additionally, RTD pitches story ideas to media outlets, writes content for its online newsroom called the News Stop and publishes the monthly digital Read-n-Ride newsletter.

### Project Webpages

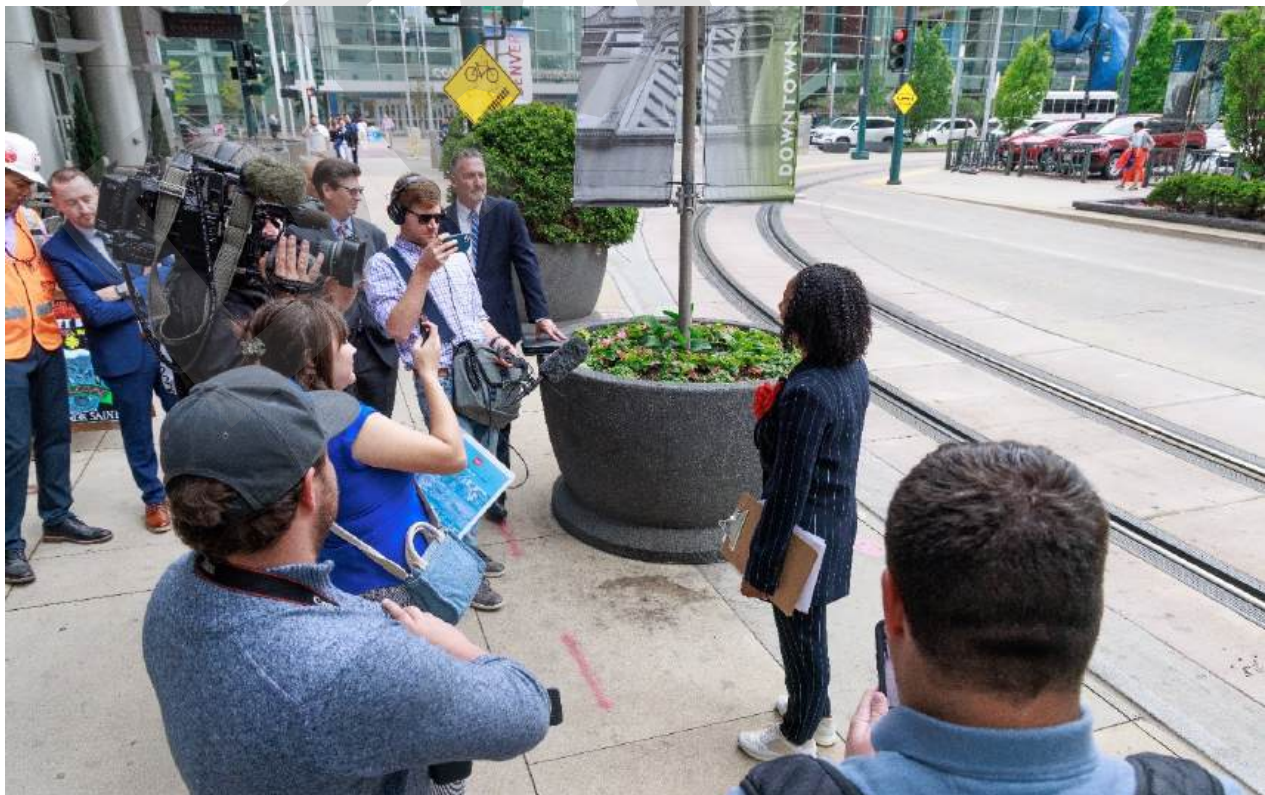
To improve access to important information about agency projects and initiatives, RTD creates and maintains project webpages, such as for [service alerts](#). These pages vary by the size and scope, depending on the project, but generally include an overview, timelines, presentation materials, fact sheets, feedback forms and contact information. Project pages are regularly updated.

### Social Media

RTD engages with customers and stakeholders on social media platforms, including [Facebook](#), [Instagram](#), [X](#) (formerly Twitter) and [LinkedIn](#) to conduct engagement campaigns, provide information, and share project updates. New and emerging social media platforms are regularly explored and considered for inclusion in RTD's portfolio.

### Website

In December 2023 RTD updated its [website](#) to improve the customer experience and enhance navigation menus. The updates included optimization for mobile devices, and made the website available in English, Spanish, Simplified Chinese, Vietnamese, Russian and Korean. The website incorporates a third-party accessibility tool to optimize navigation and provide dozens of additional features. The website also features a robust search feature, making information easier to find than in previous versions.





## Earned Media

News media remains one of the most effective means to communicate to the public. Earned media refers to publicity gained through efforts other than paid advertising or RTD's owned channels. It occurs when external sources, such as journalists, bloggers, influencers, or customers, create content and share information about the organization voluntarily. This process supports the quick dissemination of information to multiple different audiences.

- News releases and media advisories are distributed to local media, multilingual, and BIPOC-owned news outlets
- News releases, media advisories, original stories and blogs are posted on the News Stop section of RTD's website
- Media events, such as news conferences, media briefings and media avails, are used to make announcements of significant importance that is of interest to RTD's customers and the community
- Story ideas of special interest or specific topics are pitched to various members of the media; these pitches can be of interest to the audience of a particular media outlet
- Interviews with RTD leadership or a SME are used to provide additional detail to a story
- Social media is used to get information out quickly to RTD's followers on social media platforms; these social media posts provide opportunities for customer and public engagement; the reach of our messages can be extended by followers sharing the posts
- Select news releases are translated into several languages prior to sending to language-based media outlets
- Display ads in Spanish-language media and other outlets are purchased, as needed

To accommodate linguistically diverse customers, stories posted to RTD's News Stop are available in eight languages.



## Internal Trainings

### Outreach Guides

Starting in 2023, the Community Engagement work unit began developing outreach guides for major RTD-led projects. Developed in partnership with SMEs, the guides include talking points, expectations for team members and tools and resources that could be used when a customer or community member had a question or concern that can not be addressed in the moment. These documents are emailed to team members prior to the activity. Physical copies are also provided during public engagement activities.

Outreach guides were created for major agency-led projects, including the Fare Study and Equity Analysis, Downtown Rail Reconstruction and Coping Panel projects.

### Facts-n-Snacks

In March of 2024, the Community Engagement work unit hosted an internal “Facts-n-Snacks” to educate team members about the role of community engagement at RTD. Two sessions were offered online, and one was in-person. The online sessions were recorded and uploaded to RTD’s internal site, the Hub, for future reference.

### Impact Team Training

Communications and Engagement and Civil Rights facilitated two training sessions with volunteers for its pilot Impact team in the spring of 2024. Topics included best practices for communicating with limited English proficiency and customers with disabilities, de-escalation tactics, and how to be responsive to customer needs. A condensed version was recorded in January of 2025 for new Impact team volunteers.

### Operator Onboarding

As front-line employees, bus operators receive extensive training to related to customer service. Training topics include de-escalation, customer service, culturally competent communications, overcoming language barriers and assisting customers with disabilities. These trainings help operators support RTD’s diverse customer populations.

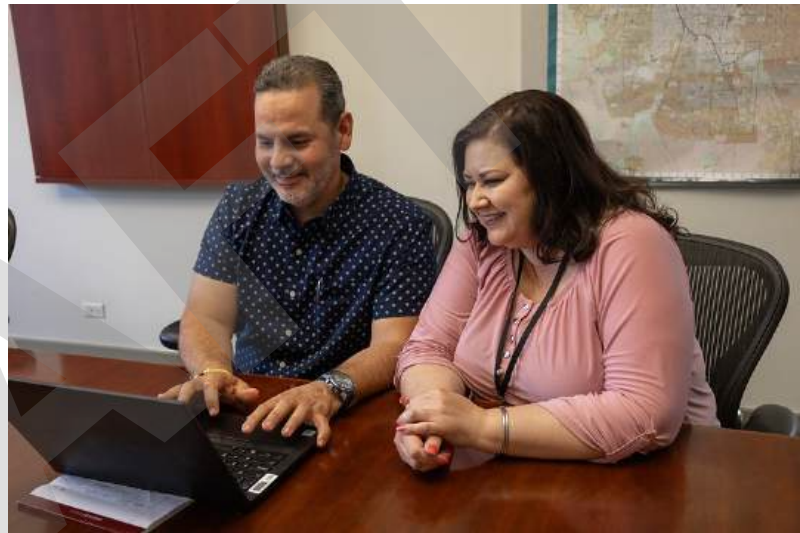
### Non-discrimination

RTD strongly encourages public-facing staff to understand basic nondiscrimination requirements and to take a discrimination training conducted by the Civil Rights Division upon joining RTD.

### Future Training Opportunities

In the future, RTD intends to establish a Community Engagement 101 course. Co-created by team members from Communications and Engagement, Civil Rights, and Learning and Development, the course will be required for any project manager who is facilitating an RTD led project that includes public engagement.

Communications and Engagement staff intend to pilot a “transit academy” for new hires in the fall of 2025. One session will focus on customer and community connections.







## Historically Underserved Population Demographics



## Importance of Public Transportation

### Public transportation is vital for all communities, but it is especially important to historically underserved populations.

According to the American Public Transportation Association (APTA), and before the COVID-19 pandemic, most transit riders were women (55%) and BIPOC (60%). Among these, Black Americans were significantly overrepresented: while they made up about 12% of the United States population, they accounted for 24% of transit riders.<sup>1</sup>

In addition, many transit customers have limited incomes. In the U.S., in 2017, 13% of households had incomes below \$15,000, but that number rose to 21% among households that rely on public transit.<sup>2</sup> Access to a car plays a major role in transit use. Among riders, 54% said they had a vehicle available to them, while 46% did not.<sup>3</sup> Households experiencing poverty are the least likely to own a car. For example, while fewer than 2% of households earning \$50,000 or more lack a vehicle, about one-quarter of households living below the poverty line don't own one.<sup>4</sup> Households led by BIPOC and women are also less likely to have access to a car. Among African American/Black households, 18% lack a vehicle, compared to 13% of Native American households, 11% of Hispanic/Latino/a households, and 6% of white households.<sup>5</sup>

### Why do people ride public transit?

For 44% of customers, it's about convenience or other non-financial benefits. For 40%, it's because they don't have another option due to financial constraints or lack of a vehicle. Just under half of transit trips are work commutes, while others are for shopping or dining (21%), recreation or social activities (18%), school (6%), medical appointments (2%) and other reasons (4%).<sup>6</sup>

Although post-pandemic data is limited, studies suggest these trends have remained consistent.<sup>7</sup> Public transit continues to serve as a lifeline for many to get to where they live, work, and play — however, it is clearly most important to historically underserved populations. This underscores the need for transit agencies, like RTD, to actively engage these populations in planning and decision-making to ensure services meet their mobility needs.

Consequently, understanding where historically underserved communities live in RTD's service area helps the agency create more inclusive and effective outreach efforts. By using data from the U.S. Census and other sources, RTD can tailor its approach to better connect with the communities who need RTD the most. The next section offers a historically underserved demographic profile of RTD's service area that guide its public engagement efforts.



<sup>1</sup>Clark, H. M. (2017, January). *Who Rides Public Transportation*. American Public Transportation Association. <https://www.apta.com/wp-content/uploads/Resources/resources/reportsandpublications/Documents/APTA-Who-Rides-Public-Transportation-2017.pdf>.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> Madeleine E.G. Parker, Meiqing Li, Mohamed Amine Bouzaghrane, Hassan Obeid, Drake Hayes, Karen Trapenberg Frick, Daniel A. Rodríguez, Raja Sengupta, Joan Walker, Daniel G. Chatman, Public transit use in the United States in the era of COVID-19: Transit riders' travel behavior in the COVID-19 impact and recovery period, *Transport Policy*, Volume 111, 2021, Pages 53-62, ISSN 0967-070X, <https://doi.org/10.1016/j.tranpol.2021.07.005>.

## Demographic Profile Datasets

Understanding the nature and distribution of BIPOC, low-income and disabled populations within RTD's service area is crucial to ensuring equitable and meaningful public engagement. This understanding enables RTD to design culturally competent, inclusive, accessible and customized approaches to public participation, ensuring that the voices of historically underserved populations are heard and valued in decision-making processes.

The RTD service area spans 2,345 square miles and is home to approximately 3.1 million people, according to the 2019–2023 American Community Survey. Of this population, 38.1% identify as BIPOC, 14.1% live at or below 150% of the federal poverty level, 7% are identified as LEP and 9.9% identify as people with disabilities. These demographic insights underscore the importance of tailoring outreach to address the needs of these populations, ensuring that barriers to participation are reduced or eliminated.

Demographic data, gathered from sources such as the U.S. Census, onboard ridership surveys and other reliable tools, plays a foundational role in shaping RTD's outreach strategies. These insights allow the agency to identify language needs, address barriers to participation, and prioritize engagement with diverse groups, including those protected under Title VI.

Population distributions vary throughout the region.

Service Area	
<b>High BIPOC Areas</b>	Aurora Lakewood Thornton East Denver Commerce City Brighton Superior
<b>High Low-Income Areas</b>	Aurora Lakewood Boulder Commerce City West Denver



## Language Access

### Linguistically Diverse Communities

RTD serves communities that speak many different languages. According to the U.S. Census Bureau, approximately 206,254 people, or about 7% of the 3.1 million residents in the RTD service area, speak English “less than very well.” This population is considered “limited English proficient,” indicating that language can be a significant barrier to them in accessing social services such as public transportation. Further, approximately 422,320 people, or 13.3% percent of the RTD service area population, are foreign born; and 652,963 persons — over 19% of the RTD service area population — speak a language other than English at home. Those who speak a language other than English at home may not be limited English proficient, but they are also an important population to consider and support in language access efforts.

While these numbers indicate that linguistically diverse persons are outnumbered by English-speaking individuals in RTD’s service area, the agency has found that these populations ride transit at a higher rate than the general population. For instance, in a survey conducted in 2024-2025 with 578 respondents of varying English language ability, RTD found that 70% of respondents ride RTD buses at least once weekly, with 54% riding RTD buses daily or almost daily. Meanwhile, 51% ride RTD trains at least once weekly, with 27% riding RTD trains daily or almost daily. Thus, while the overall numbers of the linguistically diverse population are not large, these individuals disproportionately rely on RTD services to get to where they need to go — illustrating how important it is that RTD integrate language accessibility into all its programs, services and activities. Language access efforts not only support those who are limited English proficient but also those who prefer to use their native languages. RTD finds that it is important to provide these individuals the opportunity to engage in RTD programs and services in the language that they are most comfortable using.

### Languages in RTD’s Service Area

66% of people with limited English proficiency are Spanish speakers, followed by Vietnamese (4.82%), Chinese (4.04%), Russian (3.98%) and Korean (2.1%). But that’s not all — in fact, RTD has identified 21 languages that meet the safe harbor definition, and these languages receive special consideration in RTD’s language access planning efforts.

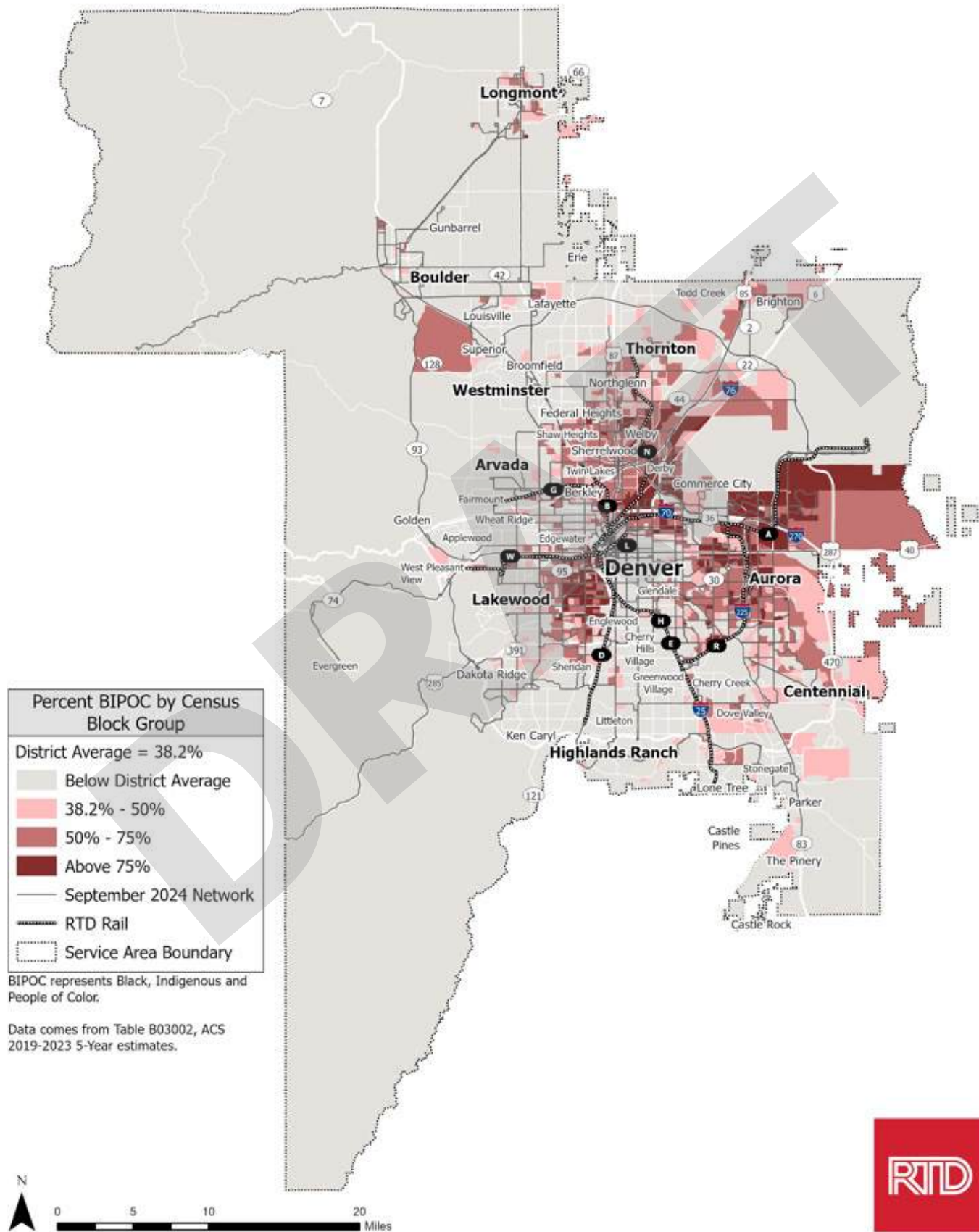
RTD’s Safe Harbor Languages	
Amharic	Korean
Arabic	Laotian
Chinese (Simplified)	Nepali (Nepalese)
Dari/Farsi (Persian)	Russian
French (European)	Somali
German	Spanish (Mexico)
Hindi	Swahili
Hmong	Tagalog (Filipino)
Japanese	Telugu
Khmer (Cambodian)	Thai
	Vietnamese

Through its engagement with the community, RTD has identified other languages that are not evident in statistical data but that are important to the local newcomer community, including new immigrants, asylum seekers and refugees. These include Burmese, Tigrinya, Karen, Pashto and Pulaar, and translated into some of RTD’s most important public-facing documents.

\*A safe harbor language refers to a language spoken by 5% of the population or 1000 people

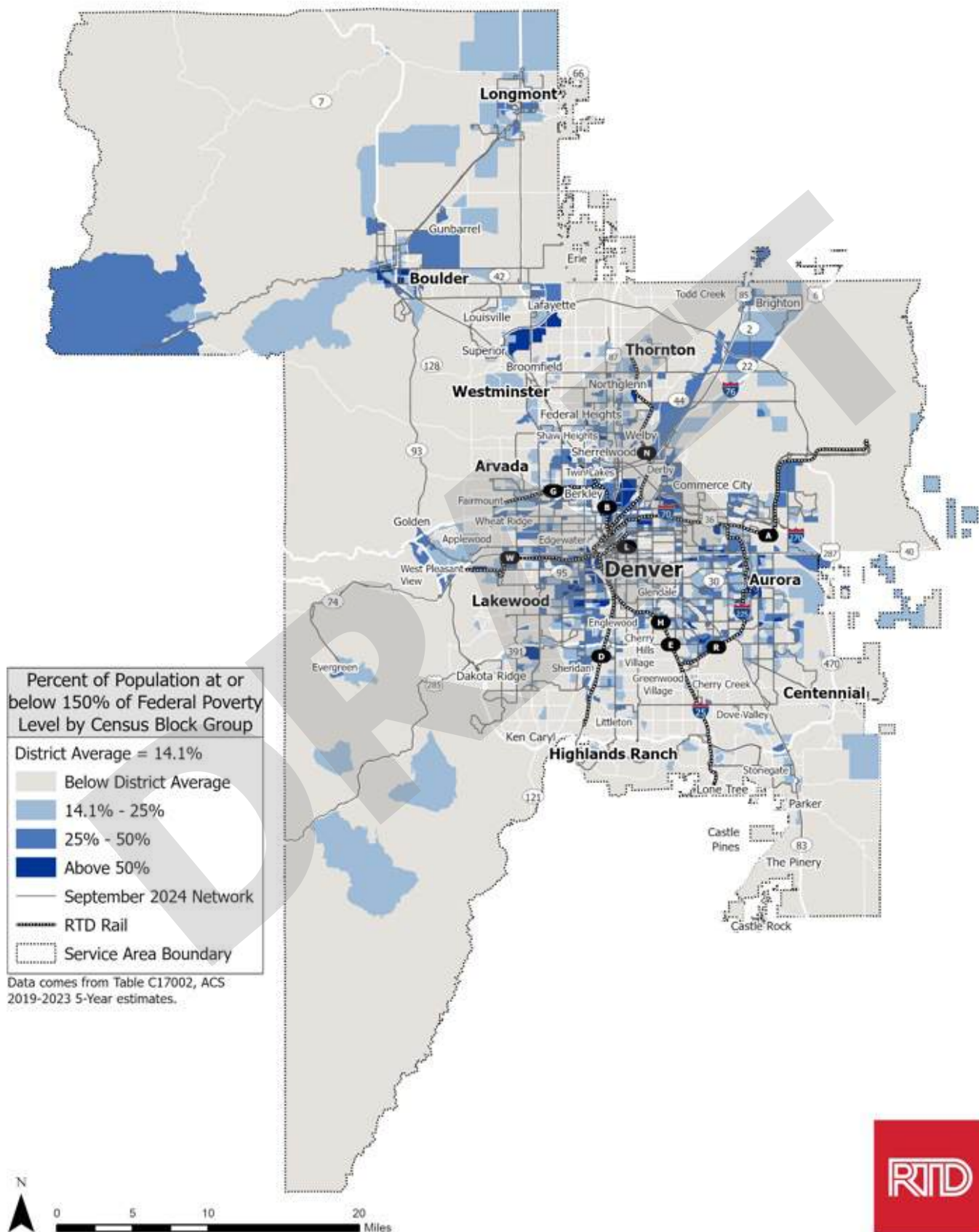


## Distribution of Black, Indigenous, Persons of Color Populations in Service Area

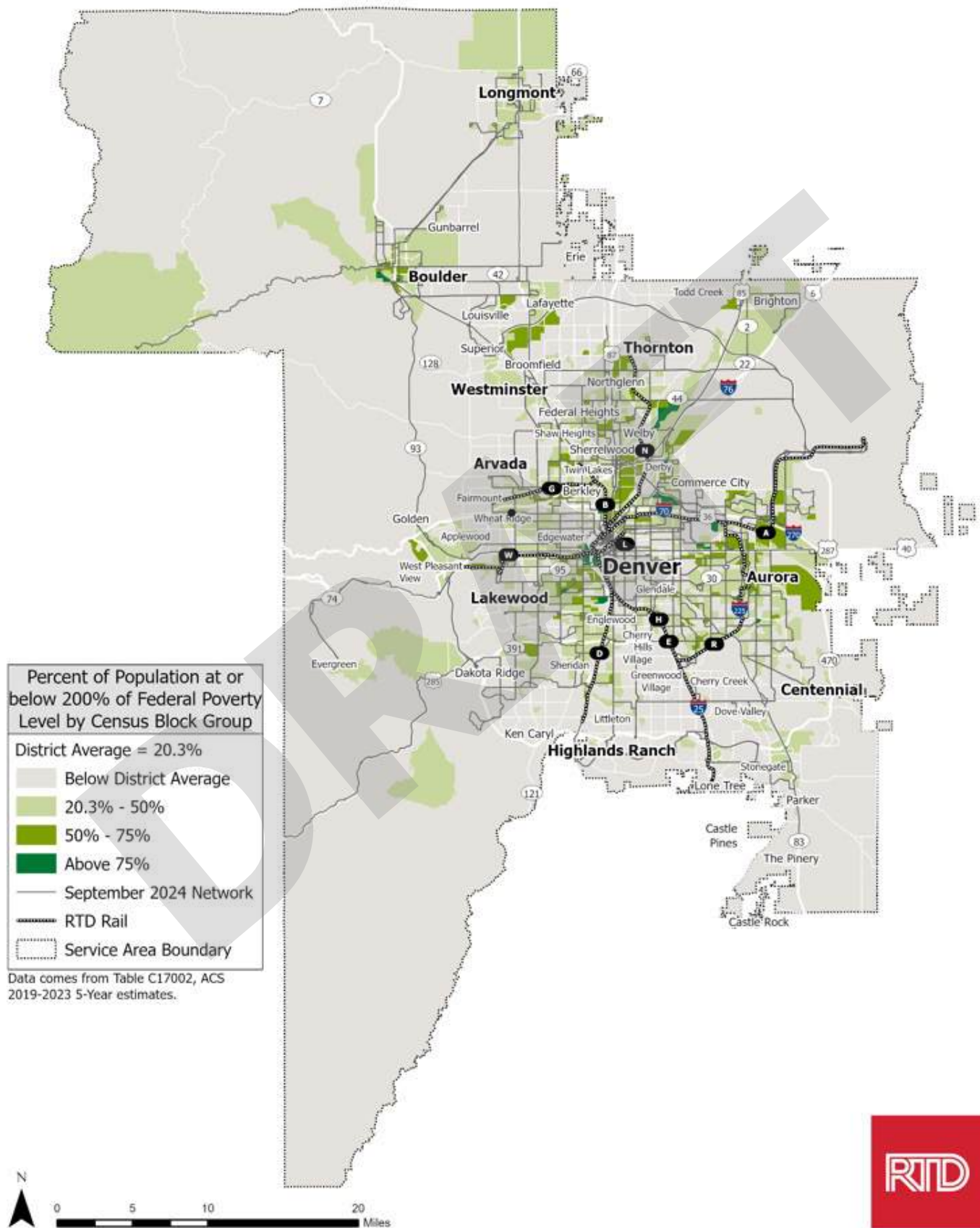




## Distribution of Low-Income Populations in Service Area) (150% of Federal Poverty Level)



## Distribution of Low-Income Populations in Service Area) (200% of Federal Poverty Level)





## People with Disabilities

RTD's service area includes many people with a wide range of disabilities. According to the US Census Bureau's American Community Survey 5-Year Estimates for years 2019-2023, 10.2% of the population (five years of age and older) living within the service area are people with disabilities.



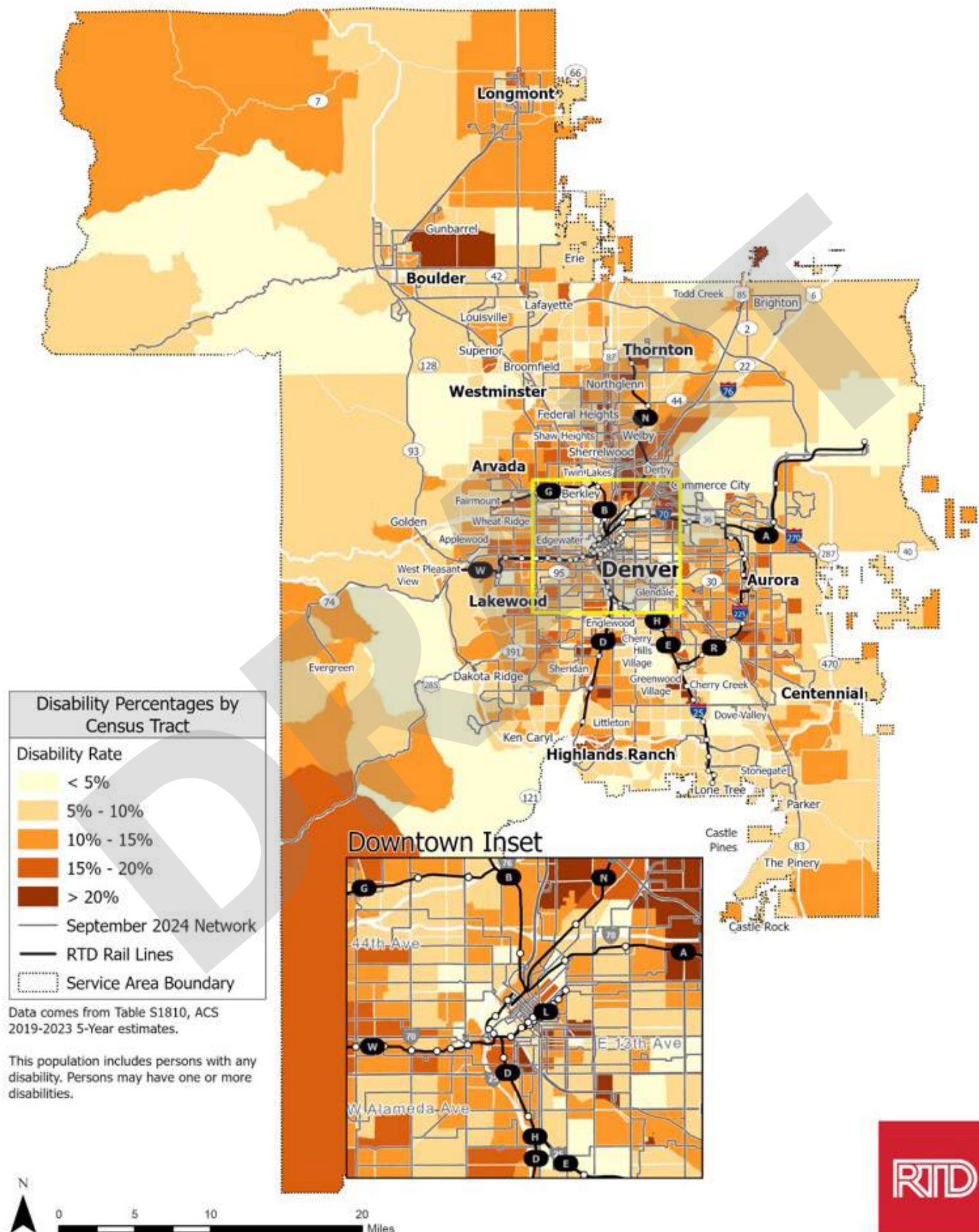
Disability	Percentage of Service Area Population
Ambulatory	40%
Cognitive	41%
Independent living	32%
Hearing-related	29%
Vision-based	18%
Self-care-related	16%

**It is important to note that people with disabilities may have more than one disability, a reality that is reflected in the above percentages.**

### People with Disabilities in RTD's Service Area



## Distribution of Disabled Populations in Service Area



## One RTD Approach





## Departments and Divisions

All RTD staff, regardless of their assigned work unit, come together as “one RTD” to make lives better through connections. The following list includes work units that perform outreach and engagement activities, as well as the roles and responsibilities assigned to their employees.

### Board of Directors and Board Office

The Board Office manages and coordinates the day-to-day affairs of the Board. Directors interact with the public regularly during monthly public meetings, at special events and on a regular basis with community, business and trade groups, stakeholders and individual constituents. The Board approves RTD’s budget, hires its general manager, sets agency policies and provides guidance on strategic initiatives. The Board Office produces all meetings of the Board and helps to facilitate public outreach undertaken by Directors.

### Bus and Rail Operations

The staff in Bus Operations and Rail Operations are the driver of transit service delivery. They maintain RTD’s vehicle fleet and work with Service Development to plan service changes and identify people power and other resources to support maintenance projects. Individuals from these work groups, including members from leadership and training, attend public meetings and other activities as SMEs. Operations staff also participate in outreach activities and coordinate travel trainings for children, service animals and people with disabilities.

### Capital Programs

Capital Programs plans and executes major transit-related construction projects throughout RTD’s service area. As engineers, they support engagement efforts by attending public meetings and open house events to answer questions and receive concerns about construction projects.

### Civil Rights Division

The Civil Rights Division contributes to public engagement activities through its Transit Equity Office (TEO), Small Business Opportunity (SBO) Office and its Americans with Disabilities Act (ADA) Office. The TEO oversees the Title VI program, including RTD’s participation and language access plans.

The SBO Office oversees the Disadvantaged Business Enterprise (DBE) and Small Business Enterprise (SBE) compliance programs to ensure these firms have equal access to RTD contracting opportunities. The SBO Office also conducts community outreach to promote a more diverse and competitive pool of potential bidders. The division’s ADA Office oversees RTD’s compliance with Titles II and III of the ADA, including proactive efforts through public information and collaboration, complementary paratransit service and accessibility to RTD vehicles and facilities.

### Human Resources

Staff from Talent Acquisition regularly connect with customers and prospective employees at career fairs. They also give presentations at high schools and colleges. In addition to being SMEs on the roles at RTD, they are trained to answer customer questions about service delivery and RTD initiatives.

### Planning

In addition to providing support and outreach for physical infrastructure and long-range land use and transit planning projects, Planning also leads large-scale policy and program initiatives, including fare, major transit and NEPA studies.

### Safety

Individuals from Safety perform outreach activities that educate customers on how to be safe around trains.

### Service Development

Service Development oversees the scheduling of all bus and rail operations for the RTD system. The division reaches out to the public three times a year when it is planning system-wide and targeted service changes and connects with stakeholders and local governments to identify future route enhancements through the SSCs and other meetings.

### Transit Police

RTD’s Transit Police unit is comprised of sworn Colorado Peace Officer Standards and Training (POST)-certified officers, detectives, commanders, and chief. Staff regularly engage with businesses and local governments to collaborate on ways to improve the safety and security of the transit system. They also connect with customers at community events.



## Communications and Engagement

Much of the agency's public engagement efforts reside in the Communications and Engagement Department. A breakdown of the work units within the department and their roles in performing public engagement is outlined below.

### Customer Care

Made up of work units that include the Telephone Information Center, four Sales Outlets and Digital Customer Relations, this team supports customers by responding to their questions, complaints and compliments through various channels, including over the phone and online. They also support community collaboration requests.

### Community Engagement

Much of the work Community Engagement executes regards community and customer education of RTD services and initiatives. The team supports RTD departments with engagement activities in a variety of ways, including providing guidance on best practices and organizing certain activities for agency-led projects. The team also responds to community collaboration requests, which includes attending various festivals and community celebrations, and presenting at schools and neighborhood meetings.

### Impact Team

Comprised of thirty-seven employees from across the agency, the Impact Team pilot supported customers during scheduled and unscheduled service disruption and large-scale community events. Impact team members assisted over 3,700 customers during 61 scheduled assignments from May to September.

### Market Development

The Market Development team manages RTD's pass programs and administers its special discount programming. The team provides information about RTD's pass and discount programs to businesses, non-profits, school districts, and institutions of higher education through various engagement activities. They regularly perform on-site education at employer and community resource fairs, host webinars and in-person presentations, and liaise with TMO who solicit pass program participants.

### Marketing

The Marketing team oversees the creation of advertising, marketing and public outreach materials for RTD, and develops effective messaging to keep customers, community members, stakeholders and employees apprised of agency initiatives. It oversees customer satisfaction and market research. In addition to managing physical collateral, the team also manages digital tools, including the NextRide web app and the RTD public-facing website.

### Public Relations

The Public Relations work unit responds to formal and informal requests for information from the news media, public, elected officials and other stakeholders about RTD operations. The team leads strategic communications to advance the RTD name, brand and reputation and develops crisis communication strategies. The team writes speeches, talking points and project fact sheets, communications plans, news releases and RTD's external newsletter, the Read-n-Ride.

### Special Projects: Communications

The Special Projects work unit supports public communications efforts for complex, highly visible agency rail and bus projects, transit improvement efforts, studies, emergency drills and service disruptions. The team writes communications for all phases of special projects, including regular collaboration with internal and consultant teams, development and deployment of communications and engagement plans, and proactive communications to customers, community members, and stakeholders.

### Future Organizational Changes

A departmental working group is evaluating the organizational structure of Communications and Engagement to identify the benefits of creating a customer and community relations division.



## Roles and Responsibilities

While embracing the One RTD approach, RTD team members are hired to perform specific duties. While many RTD employees engage in engagement and outreach activities, this section outlines the basic job functions of key team members involved in public engagement. This list is not exhaustive.

### Board of Directors and Board Office

#### *Executive Manager, Board Office*

Produces the meetings of the Board of Directors, ensures appropriate public notice of meetings, adheres to open meeting laws, publishes meeting agendas and supporting documents and responds to accessibility requests of public participants. Coordinates Director outreach activities. Manages the CAC.

#### *Directors*

Sets the agency budget and priorities. Attends RTD-hosted events. Organizes constituent outreach.

### Executive Office

#### *General Manager and Chief Executive Officer*

Provides strategic leadership and oversight of the agency's day-to-day operations, ensuring safe, reliable and efficient transportation for the community served by RTD. Works with the Board of Directors, stakeholders and government agencies to develop policies, secure funding and advance regional mobility initiatives. Oversees the operations, financial management and customer and community engagement efforts.

#### *Government Relations Officer*

Liaises between RTD leadership and local, state, and federal elected officials to advance RTD initiatives.

### Civil Rights Division

#### *Director, Civil Rights*

Develops, plans, directs and manages division operations. Oversees the agency's Civil Rights programs, including Title VI and language access, Titles II and III of the ADA, Title VII and equal employment opportunity, supplier diversity and community engagement.

#### *Manager, ADA Office*

Develops and maintains good community partnerships with persons with disabilities and local disability advocacy groups and organizations through regular engagement. Provides key guidance and support in advancing RTD's civil rights initiatives, specifically those focused on the community of people with disabilities. Ensures accessibility of events in the planning and execution phases.

#### *Manager, Transit Equity Office*

Leads initiatives to advance equity and ensure meaningful participation of BIPOC and linguistically diverse populations in agency programs and decision-making. Ensures compliance with Title VI. Oversees outreach strategies to engage historically underserved communities and collaborates with internal departments to integrate equity considerations into planning and operations.

#### *Specialist, Civil Rights Outreach*

Plays a key role in advancing RTD's civil rights initiatives by implementing and supporting outreach programs, educational campaigns and initiatives that promote equity, access and inclusion for all RTD customers and employees. Collaborates with internal teams and external stakeholders to develop and implement engagement efforts that reflect federal regulations and support equity, accessibility and civil rights.

#### *Specialist, Transit Equity*

Leads initiatives in compliance with Title VI policies, focusing on eliminating barriers for historically underserved populations by developing relationships with community organizations, local governments and elected officials, implementing culturally responsive public engagement strategies and overseeing language accessibility efforts. Helps ensure that RTD's public transportation activities serves all communities fairly and effectively.

### Communications and Engagement Department

#### *Administrator, Discount Programs*

Manages applications for RTD's discount programs. Regularly performs engagement activities at resource fairs to educate eligible customers about discount fares.

#### *Consultant, Market Development*

Conducts engagement to universities, businesses and non-profits to encourage they enroll in pass programs. Supports TMA/Os with pass program outreach and administration.

#### *Chief Communications and Engagement Officer*

Oversees all strategic communications, media and community relations, marketing, and customer experience functions.

#### *Customer Care Representative*

Staffs the TIC and Sales Outlets. Provides transit information at resource fairs.

#### *Manager, Community Engagement*

Advises project managers and teams on public participation best practices. Establishes collaborative relationships with community partners, TMA/Os and stakeholders. Conceptualizes and supports various engagement programming.

#### *Manager, Market Development*

Strategizes, directs and manages the development and implementation of communications, client services and account management for pass programs.

#### *Manager, Special Projects*

Develops key messages and news releases and coordinates information-sharing for major capital projects.





## Roles and Responsibilities

### *Manager, Public Relations*

Develops strong relationships between RTD and local media outlets. Directs media relations responsibilities.

### *Senior Manager, Customer Care*

Manages the Customer Care Division providing a range of customer services, including customer information, retail fare product sales and customer concerns and complaints

### *Senior Manager, Public Relations*

Leads and directs activities including media relations, public information, public affairs and video storytelling.

### *Specialist, Community Engagement*

Conceptualizes, plans, and executes outreach programming related to RTD initiatives and educational campaigns.

### *Specialist, Public Engagement*

Writes press releases. Responds to media inquiries. Participates in interviews with media outlets.

### *Specialist, Youth Engagement*

Manages the suite of engagement strategies related to Zero Fare for Youth programming.

### *Supervisor, Market Development*

Leads staff focused on educating eligible customers about discount fares and providing information to businesses and universities about pass programs.

## Human Resources

### *Talent Acquisition Partner*

Plans, organizes, and implements recruitment activities through public engagements that include career fairs, school presentations and other community events.

## Planning

### *Project Manager, Planning*

Manages major agency initiatives, including fare studies, long range plans and corridor studies. When managing consultant work, ensures work scope is consistent with the PPP.

## Service Development

### *Service Planner and Scheduler*

Performs technical work related to the scheduling and development of bus and rail routes. Supports public engagement activities related to service changes.

## Transit Police

### *Business Support*

Organizes Transit Police staff participation in community events.

### *Chief of Police*

Directs division activities related to engagement. Attends public meetings, presentations and other activities to share information about RTD safety and security initiatives.

### *Commander*

Assigned to a geographic service area, supports engagement activities by attending presentations and community festivals to educate customers and community members.







## Appendix



## Implementation Timeline

Staff intend to complete the following tasks during the PPP period to further enhance its ability to engage with members of the public. These projects support the advancement of RTD's public participation, accessibility and language access plans.

2025	Q1	Refine the Public Participation Plan
	Q2	Identify appropriate workflows and work unit structures to best support customer experience and public participation activities
		Identify opportunities to offer hands-on travel training or transit experience programming
		Implement the CILACES CBO contract
		Rebrand Community Engagement as Community Relations to emphasize long-term relationship-building as part of RTD's "customer and community connections" strategic priority
	Q3	Develop an internal stakeholder working group to identify work unit needs in RTD's customer relations management (CRM) tool, Salesforce
		Identify the potential and establish a framework for implementing a diverse customer transit academy
		Seek out support from CBOs, TMOs, and RTD committees to recruit participants
		Implement the internal Transit Academy pilot.
		Create a framework for the tracking of all customer accessibility accommodation requests (e.g.: Sign Language Interpreters, large print documents, Braille)
		Assess and implement strategies and tactics in the Disability Community Engagement Plan
		Determine which metrics are critical for all work units to capture when conducting public participation
	Q4	Develop the Targeted Community Engagement Framework and Strategies document
		Compile a list of venues in which RTD events have been held to complete a comprehensive accessibility assessment venue list to be used in 2026 and beyond
2026	Q1	Recruit for a Senior Manager, Customer and Community Relations
	Q2	Evaluate the effectiveness of RTD's Public Participation Plan
	Q3	Produce a proof of concept for the Targeted Community Engagement Framework and Strategies document
	Q4	
2027	Q1	Evaluate the effectiveness of RTD's Public Participation Plan
	Q2	Develop project timeline and deliver assignments for the Public Participation Plan update
	Q3	Internal working group meets to review PPP sections and provide feedback
	Q4	Internal working group meets to review PPP sections and provide feedback
2028	Q1	Finalize the Public Participation Plan as part of RTD's Title VI update
	Q2	
	Q3	
	Q4	



## Public Participation Case Studies

The following section highlights recent public participation efforts for six major agency-led projects. They demonstrate RTD's commitment to engaging with all customers and community members.

### Northwest Rail Peak Service Study (2022-2024)

Due to cost escalation and limited available funding, RTD has been unable to complete the Northwest Rail Corridor (B-Line) beyond its current terminus at Westminster Station. RTD initiated the Northwest Rail Peak Service Study (NWR PSS) to evaluate the possibility of completing the corridor with a reduced level of service than that which was envisioned in the original 2004 voter-approved FasTracks plan. The intent of the Feasibility Study was to determine a common set of facts related to design requirements, cost, and ridership, among other considerations.

Since previous studies had already determined the corridor alignment and station locations along with the associated environmental impacts, community engagement for this effort was somewhat limited. However, over the two-year study period, in addition to the establishment of a Study Advisory Team, which met monthly, the study team held a variety of outreach activities, such as local corridor-wide open houses, email communications, and a website which included self-guided online meetings. All physical and print materials were available in English and Spanish. Pop-up events at farmers markets, ice skating rinks, and libraries ensured that RTD could collect feedback from diverse stakeholder communities.

Project resources are available on the [NWR PSS webpage](#).

#### In-Person Engagement

4	Corridor-wide open houses
14	Local pop-up events
195	Public open house attendees
2	Board committee updates
1	Full Board update

#### Digital Engagement

1,120	Email sign-ups and comments
15,184	Total project webpage views (April 2022 – Aug. 2024)
919	Survey responses
9,309	Self-guided online meeting views
3,830	Online meeting engaged sessions



## Public Participation Case Studies

### Fare Study and Equity Analysis (2022 – 2023)

In response to customer feedback that RTD fares were too expensive and difficult to understand, RTD initiated a Systemwide Fare Study and Equity Analysis to holistically reexamine the fare system, taking into consideration equity, affordability and simplicity. RTD took a bottom-up, customer-centric approach to the study.

In addition to the somewhat standard methods of outreach, such as community meetings, customer surveys and a website, the team also established a series of feedback panels and community partner focus groups. The three feedback panels, Equity Feedback Panel, Pass Program Feedback Panel and Jurisdiction Feedback Panel, considered customer and community input and how RTD could address commonalities and trade-offs among different perspectives and fulfill customer and community needs. For the partner focus groups, RTD contracted with six community-based organizations each serving as a community partner to help engage traditionally underserved populations through focus groups, participation in surveys and public meetings and other outreach efforts.

RTD's Public Relations work unit, with support from the project team, gave interviews to various news outlets in both English and Spanish to provide updates on the project and encourage participation. Digital and print materials, including fact sheets, were translated into more than 20 different languages spoken by customers within RTD's service area. The project team attended several large-scale community festivals that were well-attended by diverse customer population. Events included the Aurora Global Fest, Denver's Cinco de Mayo Festival and Sun Valley Night Market and the Northglenn Food Truck Carnival.

Each activity yielded significant customer, community and stakeholder feedback. RTD then collected, summarized and used the feedback to influence the development of the recommended fare structure. After more than a year of engagement with customers and stakeholders, the recommended fare changes were passed by the RTD Board of Directors on July 25, 2023. A 2024 customer survey indicated that 73.2% of customers believed that RTD's fares were affordable, a significant increase from 52.2% in 2022.

Fare Study and Equity Analysis project resources are available on the project webpage.



#### In-Person Engagement

437	Public event participants
180	Feedback panel participants
2,400	Community conversations
185	Focus group participants

#### Digital Engagement

25,000+	Email subscribers
35,000+	Website and social media views

#### Media Engagement

140 million+	Earned media reach (English and Spanish)
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#### Project Feedback

7,119	Public comment and survey responses
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## Public Participation Case Studies

### Zero Fare for Youth (2023 – 2024)

As part of its simplified fare structure, RTD eliminated fares for youth ages nineteen and younger starting August 1, 2023. Named Zero Fare for Youth (ZFY), RTD implemented various tactics for sharing this information with potential transit users. The broad approaches taken to educate families and young adults about transit spanned across all RTD's diverse community.

With state funding, RTD hired a contracted Youth Engagement Specialist position in December 2024 to spearhead additional Zero Fare for Youth engagement through December of 2025. The specialist developed a year-long engagement plan that reinforces the importance of building relationships with youth-focused organizations and young people to encourage lifelong use of transit.

The [Zero Fare for Youth webpage](#) includes project resources and toolkits.



#### In-Person Engagement

6	"How to Ride" presentations
2	Back to school nights
20+	Resource fairs
2	Trick-or-treat events
6	Transit-themed story times at local libraries
9	Family-friendly events
1	College capstone project
13	Career fairs
5	Public comment at school board meetings



## Public Participation Case Studies

### Proposed Service Changes (Ongoing)

Three times a year (January, May, and August), RTD reviews, proposes and implements changes to its service schedules and routes. These changes improve on-time performance, account for changes in ridership, advance the implementation of long-range plans and support scheduled maintenance projects.

During and following the coronavirus pandemic, public meetings moved from in-person at RTD's downtown headquarters to an online format. Public meetings were advertised on bus and rail vehicles, on social media and in news releases.

In 2024, Communications and Engagement partnered with Service Development to overhaul its traditional public feedback process, including by:

- Categorizing changes by route adjustments, service increases, service reductions, seasonal adjustments and schedule timing to help customers better identify the impact of proposed changes
- Distributing a bilingual service change toolkit to TMA/Os
- Organizing the project webpage into easy-to-search tiles
- Providing an online customer survey tool
- Creating a reoccurring "Ask a Service Planner" virtual event where customers can chat individually with staff
- Identifying key stakeholders within impacted service areas and inviting them to attend the public meetings, complete the survey or host RTD staff for a presentation
- Advertising the service changes on public information displays (PIDs) at RTD stations
- Presenting to local registered neighborhood organizations
- Sharing service change information with CBOs to encourage historically underserved populations to provide feedback

[Project resources are available on the Service Changes webpage.](#)



A vertical poster for RTD service changes. At the top is a blue square with a white icon of a person at a computer. Below it, the text reads: **CAMBIOS PROPUESTOS EN EL SERVICIO A PARTIR DE MAYO DE 2025**. Underneath, it says: **Envíe sus comentarios antes del 6 de marzo**. The middle section is titled **Servicios** and lists route numbers: 1, 9, 11, 12, 16, 19, 20, 24, 38, 42, 44, 45, 65, 66, 73, 93L, 121, 153, 169L, 225/225D, 228, 483, BOLT, DASH, JUMP, MetroRide, NB, P, SKIP, D, E, H, N, R, W. Below this, a note about **Access-a-Ride** states that route improvements or reductions can affect service availability. A QR code is provided for more information. The bottom section includes the website **rtd-denver.com/service-changes**, a phone number **303.299.6000 (TTY: 711)**, and a note that there are 2 options for Spanish and 8 for other languages. The RTD logo is in the bottom right corner.

**CAMBIOS PROPUESTOS EN EL SERVICIO A PARTIR DE MAYO DE 2025**

**Envíe sus comentarios antes del 6 de marzo**

**Servicios**  
1, 9, 11, 12, 16, 19, 20, 24, 38, 42, 44, 45, 65, 66, 73, 93L, 121, 153, 169L, 225/225D, 228, 483, BOLT, DASH, JUMP, MetroRide, NB, P, SKIP, D, E, H, N, R, W

**Access-a-Ride:** Las rutas con mejoras o reducciones pueden afectar la disponibilidad del servicio de paratransito.

Escanee para obtener más información sobre los cambios propuestos y todas las formas de enviar sus comentarios.

[rtd-denver.com/service-changes](https://rtd-denver.com/service-changes)

303.299.6000 (TTY: 711)  
2 para español  
8 for other languages

**RTD**





## Public Participation Case Studies

### Transit Assistance Grant Program (2024)

Launched as part of RTD's 2024 fare changes, the Transit Assistance Grant (TAG) program is designed to help organizations serving clients with immediate transit needs. Immediate needs refer to the needs of individuals in crisis such as domestic violence, victims seeking shelter to safe and support environment, or other individuals in situations that threaten their personal safety on a short-term basis rather than prolonged or chronic basis. The agency budgets \$1 million dollars annually for the program, which provide qualified non-profit and government partners up to \$50,000 per calendar year via 10-ride ticket books. RTD's Market Development team provides full-service support for non-profits interested in the program.

To educate potential community partners of the TAG program, the Market Development work unit hosted four webinars and one in-person meeting and collaborated with CBOs to raise awareness of the application process. A dedicated webpage included frequently asked questions, selection criteria, a downloadable presentation of the application process. Market Development received 211 applications in total. To ensure as many non-profits qualified, staff collaborated with non-profits who had incomplete applications to correct issues. Ultimately 181 non-profits received grant awards. Throughout the year, the team also published four periodic reports that included collateral necessary for non-profit outreach.

Project resources are available on the [Transit Assistance Grant webpage](#).



## Public Participation Case Studies

### Reimagine RTD (2020 – 2022)

Reimagine RTD was a comprehensive planning effort to develop a short- to mid-term plan for RTD services and a longer-term plan that established agency priorities for the future. There was a robust public engagement effort undertaken that included targeted outreach efforts for key local stakeholder groups and the public. An Advisory Committee and Technical Working Group were established to vet and review technical and policy considerations. These groups were comprised of stakeholder groups from across the service area and incorporated a range of perspectives on regional transportation. RTD used the following tools:

- Employee forums – forums that were held to introduce the plan and identify key issues from employees
- Formal focus groups – focus groups were held for both customers and community stakeholders to get input on differing perspectives on community desires for future RTD service
- Online surveys – surveys to solicit feedback on specific recommendations and priorities
- Project website – information hub that included interactive maps and graphics
- Public meetings – meetings were held in both English and Spanish to allow for direct input from key customers
- Statistically valid survey – statistically significant survey to gather input on regional public transit needs and RTD's role in supporting those needs
- Targeted listening sessions – sessions with key customer groups used to in place of in-person meetings that were not possible because of the pandemic
- Telephone town halls – meetings held in all Board districts where Reimagine RTD was one of multiple items on the agenda
- RTD Customer Panel – panel of diverse set of RTD customers used to gain direct feedback on the draft SOP
- Speaker's bureau – presentations that provided updates to local business groups, civic groups, and key agency partners by RTD staff and consultants

The COVID-19 pandemic disrupted public engagement activities during Reimagine RTD in 2020, which required pivoting to remote-based tactics and virtual engagement approaches.

Project resources are available on the [Reimagine RTD webpage](#).



## News Media Database

The following list comprises the media outlets with which the Public Relations team engages. The PR team's media list also include TMOs, municipalities' communications teams, elected officials, Board Directors, and other stakeholders who are interested in receiving RTD news and information. These additional partner organizations and individuals are encouraged to disseminate RTD information to their constituents and communities.

5280 Magazine	Colorado Sun	LaVoz
850 KOA	Denver Business Journal	Life on Capitol Hill
9News	Denver Gazette	Littleton Independent
Arvada Press	Denver Herald-Dispatch	Lone Tree Voice
Aurora Sentinel	Denver North Star	Longmont Leader
Axios	Denver Post	Longmont Times-Call
Boulder Daily Camera	Denver Urban Spectrum	METRO Magazine
Boulder Reporting Lab	Denver Weekly News	Montbello Muse
Boulder Weekly	Denver7	Niwot Left Hand Valley Courier
Brighton Standard-Blade	Denverite	Northglenn-Thornton
Broomfield Enterprise	Douglas County News-Press	Parker Chronicle
Broomfield Leader	El Semanario	Rocky Mountain PBS
BusinessDen	Elbert County News	Superior Sentinel
Canyon Courier	Englewood Herald	Telemundo
CBS Colorado	Fox31/CW2	Thoi Bao (Vietnamese)
Centennial Citizen	Front Porch	Univision
Colorado Chinese News	Golden Transcript	Washington Park Profile
Colorado Community Media	Gorizont (Russian)	Westminster Window
Colorado Hometown Weekly	Highlands Ranch Herald	Westword
Colorado Public Radio	Jefferson County Transcript	





## Stakeholder Database

Stakeholders in RTD's service area play crucial roles in RTD's planning, service delivery, and more. They include advocacy organizations, chambers of commerce, community-based organizations, environmental groups, school districts, TMOs, and many more. The following list provides an overview of many (but not all) of the stakeholders that RTD works with as it strives to fulfill its mission:

Active transportation advocacy groups	Employee transportation coordinators
Advertising firms	Energy industry
Advocacy organizations	Entertainment venues
Airports, especially Denver International Airport	Foundations
Business improvement districts	Government agencies
Business organizations	Healthcare industry, hospitals and medical institutions
Carpoolers and vanpoolers	Homeowners and registered neighborhood associations
Chambers of commerce	Hospitality industry
City and county commissions	Human services organizations
City and county staff throughout the RTD district	Independent living councils
City planning associations	Law enforcement organizations
Civic clubs, including Rotary and Kiwanis	Logistics firms
Commercial bus, taxi and car share services, including Lyft and Uber	Native American tribal organizations
Community advisory groups	News media outlets
Community Fairs and festivals	Parks and recreation centers and districts
Community food banks and pantries	Professional organizations
Community leadership councils	Rail companies and agencies, including Burlington Northern Santa Fe, Union Pacific and Amtrak
Community members	Religious organizations and faith-based institutions
Community-based and nonprofit organizations	Senior centers
Councils of government	Social services agencies
Cultural and arts organizations	Stakeholder working groups
Customers of RTD	Transit agencies, including Bustang
Developers and real estate firms	Vendors, consultants and contractors
Economic development organizations	Workforce centers
Educational institutions, including K-12, higher education, trade schools and apprenticeship programs	



## Acronyms

**ACPD:** Advisory Committee for People with Disabilities

**ADA:** Americans with Disabilities Act of 1990

**ADAO:** Americans with Disabilities Office

**APAC:** Access-a-Ride Paratransit Advisory Committee

**APTA:** American Public Transportation Association

**BIPOC:** Black, Indigenous and People of Color

**CAC:** Citizens Advisory Committee

**CART:** Communication Access Realtime Translation

**CBO:** Community-Based Organization

**DBE:** Disadvantaged Business Enterprise

**EAR:** Event Attendance Rubric

**FTA:** Federal Transit Administration

**LAP:** Language Access Plan

**LEP:** Limited English Proficiency or Limited English Proficient

**NEPA:** National Environmental Policy Act

**PEC:** Planning and Environmental Communications

**PPP:** Public Participation Plan

**SBO:** Small Business Opportunity Office

**SME:** Subject-Matter Expert

**SOP:** System Optimization Plan

**SSC:** Sub-Regional Service Council

**TAG:** Transit Assistance Grant

**TEO:** Transit Equity Office

**TMA/O:** Transportation Management Association/Organization



## Glossary of Terms

### Accessible

As defined by the Federal Transit Administration, a site, building, facility or portion thereof that complies with defined standards and that can be approached, entered and used by people with disabilities.

### Accessible Service

Service that is accessible to customers with disabilities.

### Access-a-Ride (AaR)

RTD's ADA complementary paratransit service that supplements fixed-route services. Customers must meet criteria set by the Americans with Disabilities Act of 1990.

### Access-on-Demand (AoD)

RTD's supplemental, premium paratransit service that provides subsidized curb-to-curb taxi and rideshare options. Available to eligible Access-a-Ride customers.

### Americans with Disabilities Act of 1990 (ADA)

This federal act requires changes to operations and facilities to ensure people with disabilities have access to jobs, public accommodations, telecommunications and public services, including public transit.

### Back to Basics

A strategic initiative established to enhance the reach and impact of internal communications and to redouble agency efforts to maintain assets in a state of good repair leveraging sound asset management principles.

### Board of Directors (BOD)

RTD is governed by a 15-member, publicly elected Board of Directors. Each director is elected to a four-year term and represents a specific district within RTD's service area. Elections are staggered so that eight seats are open in one general election, seven in the next.

### Community-Based Organization (CBO)

A non-profit or public organization that works to improve the wellbeing of a community by addressing local needs. RTD partners with CBOs to enhance and improve engagement with historically underserved communities.

### Customer

Individual who uses RTD's bus, rail, paratransit or on-demand services.

### Customer Care

The division responsible for addressing customer concerns, answering questions, providing information and sending service alerts. Customer Care includes the Telephone Information Center.

### Customer and Community Connections

A strategic initiative of the agency that emphasizes the importance of community involvement and feedback in the delivery of RTD service.

### Dashboard

A visual tool used to track, monitor and display key performance indicators (KPIs) or metrics. It consolidates data from various sources into a single, easy-to-read interface, allowing users to assess the performance of specific processes, departments or the entire organization.

### Director(s)

A publicly-elected member of RTD's Board of Directors.

### District

The geographic area represented by a Board Member.

### Environmental Justice

The just treatment and meaningful involvement of all people, regardless of income, race, color, national origin, Tribal affiliation or disability, in agency decision-making and other federal activities that affect human health and the environment.

### Equal Employment Opportunity (EEO)

A set of federal laws that make it illegal to discriminate against a job applicant or employee because of the person's race, color, religion, sex (including pregnancy and related conditions, gender identify and sexual orientation), national origin, age (40 or older), disability or genetic information. Enforced by the U.S. Equal Employment Opportunity Commission (EEOC). See also Title VI/Title VII.

### Fares

Amounts charged to customers using RTD services.

### Federal Transit Administration (FTA)

The federal agency that helps cities and communities provide mobility to their residents. Through its grant programs, FTA provides financial and planning assistance to help plan, build, and operate bus, rail and paratransit systems.

### Fixed-Route Service

Services that operate according to fixed schedules and routes. RTD's fixed-route services are bus, light, rail and commuter rail.

### FlexRide

RTD's service that supplements fixed-route services by providing curb-to-curb transportation specific to a geographic area.





## Glossary of Terms

### Limited English Proficiency (LEP)

Individuals who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

### LiVE Program

A discount fare program available to qualifying low-income customers.

### Low-Income Populations

Though not explicitly under Title VI, the Federal Transit Administration integrates consideration of low-income populations (defined as individuals whose household income is at or below the federal poverty guidelines set by the U.S. Department of Health and Human Services) to ensure compliance with environmental justice principles. AT RTD, low-income status for populations within the district is derived from Census Bureau population estimates and is based on 200% of the United States federal poverty level, based on local context, which is an annual income of \$32,580 for a family of three.

### Minority Populations

Defined by the Federal Transit Administration as individuals belonging to racial or ethnic minority groups, including Black or African American, Hispanic or Latino, Asian, American Indian or Alaska Native and Native Hawaiian or Pacific Islander. The public participation plan refers to minority populations as BIPOC.

### MyRide App

A mobile device application available for purchasing fares and planning transit trips.

### NextRide App

Provides schedules and trip planning for customers.

### On-Demand

Services provided when a customer calls or uses an app to request them, rather than scheduled or fixed-route service. This includes FlexRide and paratransit services.

### Paratransit Service

Transit service required by the ADA, generally characterized by prearranged curb-to-curb service provided using accessible vehicles.

### People Power

A strategic initiative established to support RTD's workforce, the agency's most important resource, in achieving the agency's mission. The initiative seeks to address impediments to recruitment and retention efforts and to foster a culture of learning and development.

### Reduced (Discount) Fares

Discounted fares for seniors, low-income and individuals with disabilities.

### Ridership:

This is the total number of customers boarding RTD's revenue service vehicle, which is calculated by each mode. Transfers are included in total ridership and customer boarding counts (e.g., if a person transfers from one bus to another bus or from a bus to rail, this is counted as two boardings).

### Title VI/Title VII

Parts of the Civil Rights Act of 1964 that protect individuals against discrimination. Title VI prohibits discrimination based on race, color or national origin in any program or activity that receives federal funding. Title VII protects employees and job applicants from employment discrimination based on race, color, religion, sex and national origin. See also Equal Employment Opportunity.

### Transit Assistance Grant (TAG)

A program that provides qualifying non-profits with a limited number of fares at no cost to assist their clients with immediate transportation needs.

### Welcoming Transit Environment

A strategic initiative focused on reducing the impacts of criminal behaviors and Customer Code of Conduct (Respect the Ride guide) violations on RTD's services and in workplaces. The effort aims to improve community and employee perception of personal safety and security.

### Zero Fare for Youth

All individuals 19 and under are eligible to use all RTD services at no cost.



# Communications and Engagement Work Plan

## OUTREACH/ENGAGEMENT CAMPAIGN

Communications and Engagement Work Plan Date:

Project Lead:

### Scope

### Objectives Background

### Strategic Priorities

### Strategic Initiatives

### Community Partners

Community Partner Name	Contact Name	Role	Email Address

### Audience(s)

### Talking Points and Helpful Resources

### Digital Assets

### Physical Assets

### Budget

Expense	Cost	Budget Code
Total Cost:	\$	

Communication and Engagement Work Plans are used for both RTD-led public engagement projects and community collaborations to help delineate roles and responsibilities for the cross-disciplinary project teams.



# Communications and Engagement Work Plan

## NEEDS AND ASSIGNMENTS

Communications and Engagement		
Community Engagement Tasks/Assignments	Contributor	Due
Public Relations Tasks/Assignments	Contributor	Due
Internal Communications Tasks/Assignments	Contributor	Due
Digital Tasks/Assignments	Contributor	Due
Marketing Tasks/Assignments	Contributor	Due
Market Development Tasks/Assignments	Contributor	Due
Customer Care Tasks/Assignments	Contributor	Due
Additional Department/Division Supports		
Work Unit #1 Tasks/Assignments	Contributor	Due
Work Unit #2 Tasks/Assignments	Contributor	Due
Community Partner Supports		
Tasks/Assignments	Contributor	Due



# Communications and Engagement Work Plan

## OUTREACH EVENTS AND SCHEDULED ENGAGEMENTS

**Event Name**

**Itinerary**

Time	Activity

**Physical Assets Needed**

**RTD Team Members Attending**

Name	Department/Division	Email Address	Phone Number



## Outreach Summary

### Communications and Engagement Outreach Summary

Event Name	
Date	
Time	
Location	
Staff Participants	
Board Director(s)	
Total Attendees	

#### Synopsis

What was the engagement activity performed? What was the goal?

#### Successes

What went well with this activity? What can be replicated in the future?

#### Opportunities

What did not go as planned? What should be changed to make a similar activity in the future better?

#### General Comments/Feedback

What themes or topics did you hear from customers? What other information is important to note?

Outreach summaries will move to a constituent relations management (CRM) tool once it has been procured.



## Event Attendance Rubric (EAR)

Criteria	Description	Justification	Points (1-10)	Weight	Score
<b>Alignment with RTD's mission</b>	How well does the event align with RTD's mission, values, and/or strategic priorities?			0.15	0
<b>Alignment with project/initiative</b>	How much does participation in this activity support an RTD project or initiative?			0.10	0
<b>Brand visibility</b>	How will attending the event increase RTD's visibility?			0.1	0
<b>Audience size</b>	What is the expected number of attendees?			0.1	0
<b>Target audience</b>	How relevant is the event to RTD's audience (e.g., customers, other stakeholders)?			0.1	0
<b>Audience characteristics</b>	How much does participation in this activity support Title VI populations?			0.05	0
<b>Audience languages</b>	What language groups are present? Will language equity and/or other accessibility measures be required?			0.05	0
<b>General accessibility</b>	In physical terms, how accessible is this event?			.05	0
<b>Networking opportunities</b>	Does the event offer networking opportunities for partnerships?			0.05	0
<b>Partnership relationships</b>	Does the event involve a new or existing RTD partner? If existing, when was the last time RTD engaged this partner?			0.05	0
<b>Cost vs. benefit</b>	How much do the expected benefits of attendance outweigh the costs of attendance (including staff time)? What is the cost (\$) to attend (if applicable)?			0.1	0
<b>Resource availability</b>	Does RTD have the necessary resources including staff, materials, and time to attend?			0.1	0
<b>TOTAL</b>					

### Scoring Guide

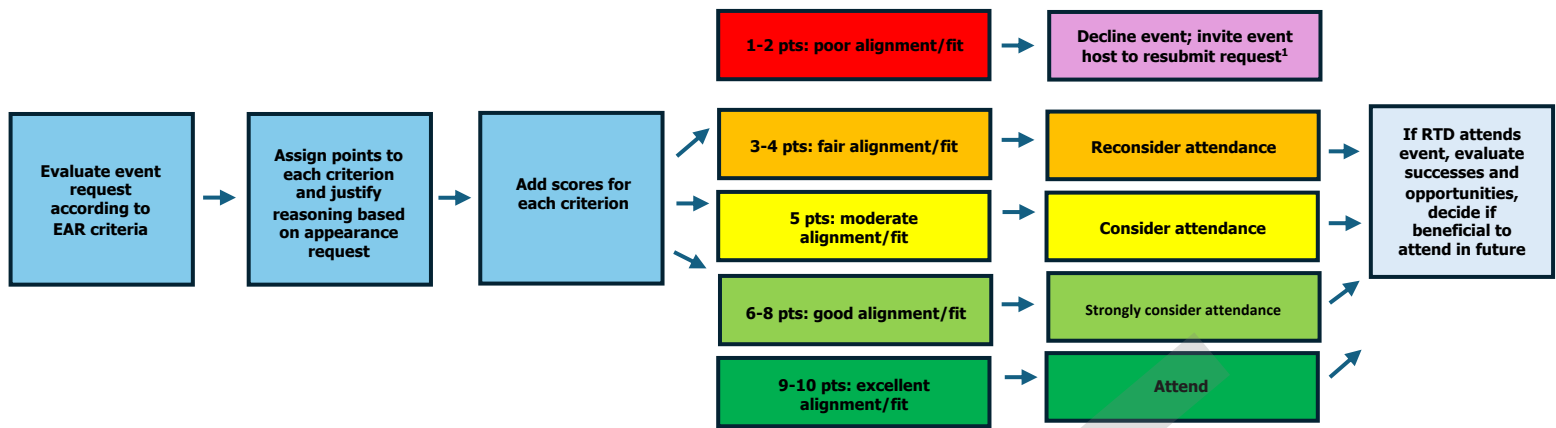
	1.0 – 2.9 Poor Alignment/Fit
	3.0 – 4.9 Fair Alignment/Fit
	5.0 – 5.9 Moderate Alignment/Fit
	6.0 – 8.9 Good Alignment/Fit
	9.0 – 10.0 Excellent Alignment/Fit

Community Engagement staff prioritize supporting activities with "good" or "excellent" alignment to RTD initiatives and/or customers. Activities with "poor" alignment are declined.





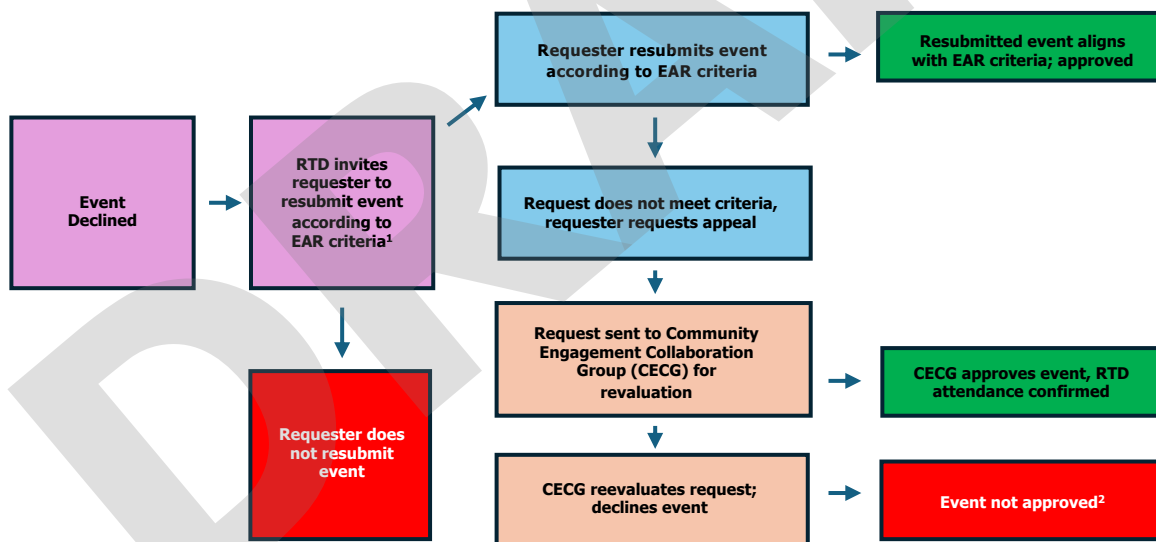
## Event Attendance Request (EAR) Flowchart



<sup>1</sup> Appeal process available upon request

When a request to collaborate is received, RTD staff work with the requester to determine the value of RTD's attendance. Staff seek out additional information from requesters when the request lacks enough detail to assess. Requesters are encouraged to complete the Request a Collaboration form with enough detail to help support the case for RTD's participation in their activity.

## Event Attendance Request (EAR) Appeal Process



<sup>1</sup> EAR criteria explained upon request

<sup>2</sup> In extenuating circumstances, CECG decisions may be appealed. In these cases, RTD's Chief Communications Officer will make a final decision regarding RTD's participation in an event

The Event Attendance Rubric (EAR) helps RTD identify worthwhile collaborations while respecting limited people power resources.



## Federal and State Requirements

The following is a summary of the various regulations and guidance that inform RTD's Public Participation Plan and its resulting activities.

Source Document	Purpose
<b>Title VI of the Civil Rights Act of 1964 (Title VI)</b>	Title VI prohibits discrimination based on race, color, or national origin in federally funded programs or activities, including in public participation activities.
<b>FTA Circular 4702.1B: Title VI Requirements and Guidelines for Federal Transit Administration Recipients (FTA C 4702.1B)</b>	FTA C 4702.1B is the primary source of federal guidance for complying with Title VI. Public participation is listed as one of FTA's three Title VI Program objectives (Chap. II-1), specifically: "Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin." Additionally, the FTA Circular 4702.1B requires that recipients submit 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." <i>Chap. III-5, Promoting Inclusive Public Participation</i> instructs recipients to integrate the contents of Title VI, Executive Order 13166, and the DOT LEP guidance into the development of the public participation plan. <i>Chap. III-5</i> also includes a list of effective practices for promoting public participation. In addition to the public participation plan, every Title VI Program is required to include a language access plan that ensures that limited English proficient (LEP) persons have meaningful access to the services, programs and activities provided by the recipient.
<b>U.S. Department of Transportation Order 5610.2(a) Final DOT Environmental Justice Order</b>	U.S. DOT Order 5610.2(a) outlines how the Department of Transportation incorporates environmental justice into its programs, policies, and activities to prevent disproportionately high and adverse effects on minority and low-income populations. The FTA requires transit agencies to follow the Environmental Justice Circular 4703.1 (which aligns with the principles in the DOT Order), particularly in integrating environmental justice and preventing harmful impacts (specifically, <i>Section 5, Integration with Existing Operations</i> and <i>Section 7, Preventing Disproportionately High and Adverse Effects</i> ).
<b>National Environmental Policy Act (NEPA) Public Involvement Process: 42 U.S. Code § 4331</b>	The National Environmental Policy Act (NEPA) Public Involvement Process requires federal agencies to provide opportunities for public review and comment on their environmental assessments.
<b>FTA Circular 4703.1: Environmental Justice Policy Guidance for FTA Recipients (August 15, 2012)</b>	FTA Circular 4703.1 provides guidance to recipients of FTA funding on how to incorporate environmental justice principles into transportation planning and project development, ensuring that minority and low-income communities are considered and not disproportionately impacted by transit projects. Specifically, it outlines how to actively engage these communities in the decision-making process and mitigate potential negative environmental effects on them.



## Federal and State Requirements

Source Document	Purpose
<b>U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons</b>	U.S. DOT's LEP guidance provides detailed information concerning the responsibilities of recipients of federal transportation funding to provide language assistance to persons with limited English proficiency. <i>Section V, How Does a Recipient Determine the Extent of Its Obligation to Provide LEP Services</i> , provides detailed guidance related to the development of the required Four Factor Analysis component of the Language Access Plan. <i>Section V, (2) The Frequency with Which LEP Individuals Come in Contact with the Program, Activity, or Service</i> states that recipients should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups. <i>Section VI, Selecting Language Assistance Services, B. Written Language Services (Translation)</i> addresses the role of providing written translation in ensuring meaningful access to public participation activities.
<b>49 U.S. Code. § 5307 Urbanized Area Formula Grants, Public Participation Requirements</b>	Recipients of DOT § 5307 grant funding must follow several steps to ensure transparency and public involvement. They must provide information on available funds and proposed projects, consult with interested parties, and publish the proposed program for public review and comment. A public hearing must be held to gather citizen feedback, and the proposed projects must coordinate with other federally assisted transportation services. Comments, particularly from private transportation providers, must be considered in the final project plan, which is then made available to the public.
<b>Colorado Revised Statute (CRS) §24-34-601</b>	CRS §24-34-601 prohibits discrimination in places of public accommodation. It makes it unlawful to discriminate against someone based on the following characteristics: disability, race, creed, color, sex, sexual orientation, gender identity, gender expression, marital status, and national origin. In this manner, CRS §24-34-601 expands on the civil rights protections offered by Title VI at the federal level.
<b>FTA Circular 4710.1: Americans with Disabilities Act Guidance for FTA Recipients</b>	FTA Circular 4710.1 provided guidance to recipients and subrecipients of Federal Transit Administration (FTA) financial assistance necessary to carry out provisions of the Americans with Disabilities Act (ADA) of 1990, Section 504 of the Rehabilitation Act of 1973, as amended, and the U.S. Department of Transportation's implementing regulations at 49 CFR Parts 27, 37, 38, and 39.



## Public Engagement Activities Jan. 2022 – Mar. 2025


During the last review period, RTD engaged with over 590,000 customers and community members. The following list includes public engagement activities from Civil Rights, Communications and Engagement, Human Resources, Planning and Transit Police teams from January 1, 2022, through March 31, 2025.





## Public Engagement Activities

### Jan. 2022 – Mar. 2025

 Date	Event Name	Location	Number Engaged
1/5/2022	Hispanic Contractors of Colorado Infrastructure Committee	Virtual	10
1/19/2022	SBE/DBE/M/WBE Engagement Check In	Virtual	5
1/20/2022	Hispanic Contractors of Colorado Small Business Round Table	Virtual	8
1/20/2022	COMTO Monthly Membership Meeting	Virtual	10
2/2/2022	Hispanic Contractors of Colorado Infrastructure Committee	Virtual	10
2/9/2022	State of Women in Business	Virtual	220
2/17/2022	Monthly Membership Meeting	Virtual	12
2/23/2022	Small/Disadvantaged Business Enterprise Advisory Council	Virtual	66
2/23/2022	Information Session	Virtual	4
2/24/2022	Powerful Voices Conversation Series	Virtual	160
2/24/2022	VIP Sponsor Reception	Denver	86
2/24/2022	DBE Goal Methodology Feedback - Asian Chamber of Commerce	Virtual	4
2/28/2022	DBE Goal Methodology Feedback - USDOT West Central	Virtual	4
2/28/2022	DBE Goal Methodology Feedback - Colorado Black Chamber of Commerce	Virtual	3
2/28/2022	DBE Goal Methodology Feedback - Black Construction Group	Virtual	3

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
3/1/2022	DBE Goal Methodology Feedback - Colorado Minority Business Office	Virtual	3
3/2/2022	Infrastructure Committee	Virtual	10
3/2/2022	Business Development Strategy Group	Virtual	11
3/2/2022	DBE Goal Methodology Feedback - Colorado Women's Chamber of Commerce	Virtual	4
3/3/2022	DBE Goal Methodology Feedback - Associated General Contractors of Colorado	Virtual	4
3/7/2022	2022 Annual Membership	Denver	160
3/9/2022	How to Do Great Work and Take Excellent Care of Yourself	Virtual	3
3/11/2022	Honoring Waymakers	Denver	80
3/12/2022	Annual Awards Banquet	Denver	500
3/17/2022	People With Disabilities Partnership Meeting	Virtual	7
3/17/2022	Women in the Workplace	Virtual	3
3/17/2022	Monthly Membership Meeting	Virtual	22
3/22/2022	Economic Update	Virtual	43
3/23/2022	Community Resource Connection	Denver	25
3/24/2022	Business After Hours	Denver	20
3/25/2022	Small Business Round Table Networking Event	Denver	20
3/25/2022	Cafecito	Denver	30



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
4/5/2022	Business Development Strategy Group	Virtual	10
4/6/2022	Infrastructure Committee	Virtual	8
4/20/2022	Annual Membership Meeting	Denver	20
4/21/2022	Small Business Round Table	Virtual	5
4/21/2022	Monthly Membership Meeting	Virtual	12
4/27/2022	Small/Disadvantaged Business Enterprise Advisory Council	Virtual	35
4/28/2022	Powerful Voices Conversation Series	Virtual	47
4/28/2022	Fare Study Spanish Community Meeting	Virtual	81
5/3/2022	Business Development Strategy Group	Virtual	20
5/4/2022	Infrastructure Committee	Virtual	8
5/18/2022	General Membership Meeting	Denver	129
5/18/2022	USDOT Symposium	Virtual	8
5/18/2022	General Membership Meeting	Denver	65
5/19/2022	Monthly Membership Meeting	Denver	20
6/1/2022	RTD's Proposed Overall DBE Goal	Virtual	40
6/1/2022	Infrastructure Committee	Virtual	10
6/8/2022	AAPI Strong Small Business Roundtable	Virtual	30
6/16/2022	Small Business Round Table	Virtual	8
6/29/2022	Fare Study Spanish Community Meeting	Virtual	75
7/6/2022	Infrastructure Committee	Virtual	8
7/11/2022	Transportation and Construction Girl Career Week Day	Denver	16

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
7/12/2022	Black Construction Group	Aurora	28
7/20/2022	General Membership Meeting	Aurora	30
7/20/2022	Community Day	Greenwood Village	50
7/20/2022	Business After Hours	Denver	72
7/21/2022	Small Business Round Table	Virtual	8
7/28/2022	Zero Fare for Better Air Kick Off	Denver	43
7/28/2022	Business After Hours	Denver	35
8/5/2022	Sabor	Denver	28
8/11/2022	25 Most Powerful Women	Aurora	20
8/17/2022	Summer BBQ	Denver	26
8/18/2022	Small Business Round Table	Virtual	8
8/24/2022	Open House	Denver	120
8/25/2022	Business After Hours	Denver	25
8/31/2022	Small/Disadvantaged Business Enterprise Advisory Council	Virtual	35
9/7/2022	Hispanic Contractors of Colorado Infrastructure Committee Meeting	Denver	8
9/13/2022	Business Networking BBQ & Pitch Competition	Denver	20
9/14/2022	Block Party	Aurora	30
9/15/2022	Small Business Round Table	Virtual	40
9/15/2022	Focus Group - Interpreter Network by Spring Institute	Virtual	14
9/17/2022	Fiesta Cook Out - 50th Anniversary	Denver	150
9/21/2022	Wine Tasting and Professional Service Tradeshow	Denver	50

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
9/21/2022	Business After Hours	Denver	28
9/21/2022	Reverse Fair Trade	Denver	215
9/29/2022	Transportation and Construction Girl Career Day	Golden	150
10/5/2022	Infrastructure Committee	Virtual	36
10/6/2022	Advanced Procurement Expo	Virtual	300
10/12/2022	Operationalizing Workplace Equity	Denver	120
10/19/2022	Small/Disadvantaged Business Enterprise Advisory Council	Virtual	46
10/27/2022	Business After Hours	Denver	35
11/1/2022	Business Development Strategy Group	Virtual	24
11/2/2022	Infrastructure Committee	Virtual	28
11/10/2022	Annual Civil Rights Award	Denver	215
11/10/2022	8th Grade Career Expo	Denver	150
11/12/2022	Annual Awards Banquet	Golden	315
11/16/2022	General Membership Meeting	Lone Tree	40
11/16/2022	Business After Hours	Centennial	22
11/17/2022	Small Business Round Table	Virtual	31
11/29/2022	8th Grade Career Fair x3	Denver	220
11/30/2022	Winter Networking Event	Denver	75
12/1/2022	Holiday Social	Denver	118
12/6/2022	Athena Leadership Awards	Denver	250
12/7/2022	Infrastructure Committee	Virtual	24
12/8/2022	Holiday Networking Luncheon	Englewood	130

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
12/14/2022	Annual Cake Auction and Holiday Social	Englewood	120
12/13/2022	Black Construction Group	Denver	40
12/15/2022	Small Business Round Table	Virtual	75
12/15/2022	Winter Networking Event	Denver	50
12/15/2022	Winter Networking Event	Denver	30
1/4/2023	Fitzimmons Station Outreach	Denver	150
1/9/2023	Boulder Mobility & Access Council Meeting	Boulder	20
1/13/2023	2023 MLK, Jr. Business Awards	Denver	500
1/17/2023	Business Development Strategy Group	Denver	10
1/19/2023	Persons with Disabilities Partnership Meeting	Denver	4
1/19/2023	Small Business Round Table	Denver	12
1/24/2023	Town Hall Forum	Denver	60
1/26/2023	16th Street Mall Paver Community Review	Denver	25
1/27/2023	2nd Annual Business Awards Reception	Aurora	400
2/1/2023	Infrastructure Committee	Denver	15
2/4/2023	Chinese New Year	Denver	200
2/7/2023	Advisory Council for Persons with Disabilities	Denver	18
2/14/2023	Davis Bacon and Labor Compliance Presentation	Denver	25
2/15/2023	General Membership Meeting	Denver	60
2/16/2023	Small Business Roundtable	Denver	12

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
2/22/2023	Small/Disadvantaged Business Enterprise Advisory Council	Virtual	56
2/23/2023	VIP Sponsor Reception and 2023 Kick Off	Denver	60
2/23/2023	Power of the Pink Purse	Denver	50
2/24/2023	ACC Conversations - Employee Resource Group	Denver	10
2/28/2023	State of Women in Business	Denver	150
3/14/2023	Advisory Council for Persons with Disabilities	Virtual	32
4/7/2023	ADA Office - Brewability Collaboration Meeting	Denver	7
5/10/2023	Advisory Council for Persons with Disabilities	Denver	21
6/23/2023	Fare Study English Community Meeting	Denver	50
12/8/2023	Low Vision & Blind Workshop - Using My Ride	Denver	13
12/16/2023	Holiday Mixer and Toy Drive	Denver	100
8/2/2023	Infrastructure Committee Meeting	Virtual	18
8/4/2023	Sabor	Denver	3000
8/5/2023	Brick City Picnic & A. P.R.I. DenverResource Fair	Denver	150
8/8/2023	Black Construction Group	Denver	22
8/9/2023	CWCC - Founders Forum	Denver	10
8/11/2023	Cafecito	Denver	28
8/12/2023	Reimagining China Town Block Party	Denver	120
8/16/2023	Summer BBQ	Greenwood Village	200

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
8/16/2023	Business After Hours	Lakewood	26
8/17/2023	Small Business Opportunity Round Table	Virtual	12
8/17/2023	25 Most Powerful Women in Business	Denver	70
8/18/2023	HCC - Contract Opportunities Fair	Boulder	125
8/19/2023	ElevAsian Night Market	Denver	150
8/26/2023	Servicios de la Raza Gala	Denver	600
8/30/2023	Small/Disadvantaged Business Enterprise Advisory Council	Virtual	77
8/30/2023	CO Small Business Resources Support Group	Aurora	15
5/2/2023	Business Development Group	Virtual	11
5/3/2023	Infrastructure Committee	Virtual	15
5/12/2023	Safe City Youth Summit	Denver	200
5/12/2023	Organizations of Montbello Summit	Denver	135
5/16/2023	Inaugural DEI Summit	Aurora	38
5/20/2023	Kick Off to Summer	Brighton	103
5/24/2023	Business After Hours	Denver	75
5/24/2023	General Membership Monthly Meeting	Denver	40
6/1/2023	HCC 2023 Annual Golf Tournament	Lakewood	200
6/7/2023	Infrastructure Committee Meeting	Denver	12
6/9/2023	B.E.S.T. - Black Economic Success Trust Success Summit	Denver	200
6/10/2023	28th Annual Philippine Festival	Lakewood	70



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
6/13/2023	BCG-Monthly Meeting - Black Construction Group	Denver	24
6/14/2023	Colorado Woman Chamber of Commerce In-person - Founders Forum Group	Denver	2
6/20/2023	World Refugee Day Celebration	Denver	29
6/20/2023	Refugee Day Speakers Bureau	Denver	175
6/21/2023	General Membership Meeting	Denver	60
6/22/2023	Powerful Voices Conversation Series	Denver	50
6/22/2023	Community Workshop and Resource Fair	Virtual	40
6/24/2023	Heal the Hood	Aurora	87
6/28/2023	Small/Disadvantaged Business Enterprise Advisory Council	Virtual	57
4/4/2023	Business Development Strategy Group	Virtual	10
4/5/2023	Infrastructure Committee Monthly Meeting	Virtual	10
4/7/2023	Valverde Elementary Career Day	Denver	42
4/19/2023	General Membership Monthly Dinner	Denver	50
4/21/2023	Cafe con LIT	Virtual	40
4/22/2023	Community Engagement Reception	Denver	22
4/26/2023	Small/Disadvantaged Business Enterprise Advisory Council	Virtual	72
4/27/2023	Business After Hours	Denver	36
3/1/2023	Anythink Library Event	Denver	25
3/1/2023	Infrastructure Committee Meeting	Virtual	12

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
3/7/2023	Business Development Group	Virtual	15
3/10/2023	ACC Conversations - ERG Session 2	Denver	10
3/11/2023	2023 Annual Awards Banquet	Denver	350
3/15/2023	2023 BAH - ACC Cultural Experience Series - Cambodian Community	Lakewood	50
3/16/2023	Small Business Roundtable	Virtual	11
3/21/2023	2023 Roundtable Networking Event	Denver	135
3/24/2023	Transit Talk with RTD	Denver	45
1/10/2022	Subregional Service Council SW Sector Meeting	Virtual	10
1/10/2022	Subregional Service Council NW Sector Meeting	Virtual	16
1/11/2022	Subregional Service Council SE Sector Meeting	Virtual	8
1/12/2022	Listening Session	Virtual	13
1/13/2022	Subregional Service Council NE Sector Meeting	Virtual	10
1/14/2022	Boulder Stakeholder Listening Session	Virtual	14
2/2/2022	Reimagine RTD System Optimization Plan Public Meeting #1	Virtual	9
2/3/2022	May Service Changes Public Meeting #1	Virtual	12
2/4/2022	Reimagine RTD System Optimization Plan Public Meeting #2	Virtual	6
2/7/2022	May Service Changes Public Meeting #2	Virtual	7
2/8/2022	May Service Changes Public Meeting #3	Virtual	13

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
2/9/2022	Redistricting Public Hearing #1	Virtual	3
2/10/2022	Redistricting Public Hearing #2	Virtual	1
2/14/2022	Redistricting Public Hearing #3	Virtual	0
2/15/2022	Route 228 Public Meeting #1	Virtual	11
2/17/2022	Route 228 Public Meeting #2	Virtual	2
2/28/2022	Reimagine RTD System Optimization Plan Public Meeting #3	Virtual	10
3/3/2022	Reimagine RTD Multicultural Public Hearing	Virtual	1
3/3/2022	Route 228 Public Meeting	Virtual	6
3/25/2022	Community Partner Discussion	Virtual	2
3/24/2022	Restoring DenverUnion Station Press Event	Denver	50
4/8/2022	Rockies Home Opener	Denver	220
4/28/2022	Spanish Fare Study & Equity Analysis	Virtual	41
4/21/2022	English Fare Study & Equity Analysis	Virtual	44
4/27/2022	DRCOG Annual Awards Dinner	Denver	500
4/28/2022	Downtown DenverPartnership Economic Development Council	Denver	17
5/9/2022	Boulder Sector Listening Session	Virtual	13
5/12/2022	Southwest Sector Listening Session	Virtual	3
5/13/2022	Southeast Sector Listening Session	Virtual	5
5/17/2022	Northwest Sector Listening Session	Virtual	6
5/18/2022	Rider Appreciation Event	Greenwood Village	96

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
5/19/2022	Northeast Sector Listening Session	Virtual	12
5/19/2022	MallRide Tour	Denver	27
5/19/2022	Dishell Telephone Town Hall	Virtual	308
5/23/2022	Bouquet Telephone Town Hall	Virtual	181
5/23/2022	Tisdale Telephone Town Hall	Virtual	202
5/25/2022	Sloan Telephone Town Hall	Virtual	564
5/25/2022	Rivera Malpiede Telephone Town Hall	Virtual	190
5/31/2022	Williams Telephone Town Hall	Virtual	504
5/31/2022	Davidson Telephone Town Hall	Virtual	430
6/1/2022	Table event for DenverSouth TMA	Lone Tree	46
6/1/2022	Rosethan Telephone Town Hall	Virtual	391
6/1/2022	Catlin Telephone Town Hall	Virtual	264
6/2/2022	Broom Telephone Town Hall	Virtual	285
6/2/2022	Lewis Telephone Town Hall	Virtual	349
6/6/2022	Whitmore Telephone Town Hall	Virtual	389
6/6/2022	Guissinger Telephone Town Hall	Virtual	353
6/9/2022	Buzek Telephone Town Hall	Virtual	440
6/9/2022	Cook Telephone Town Hall	Virtual	414
6/22/2022	Bike to Work Day	Denver	66
6/21/2022	August Service Changes Public Meeting 1	Virtual	1
6/22/2022	August Service Changes Public Meeting 2	Virtual	2

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
6/22/2022	August Service Changes Public Meeting 3	Virtual	6
6/23/2022	English Fare Study Public Meeting June	Virtual	70
6/29/2022	Spanish Fare Study Public Meeting June	Virtual	68
6/16/2022	Monthly TMO Meeting	Virtual	18
6/18/2022	Juneteenth Celebration	Denver	45
6/20/2022	DUS Walking Tour	Denver	3
6/23/2022	DUS Walking Tour	Denver	6
6/29/2022	Zero Fare for Better Air Partner Outreach Presentation #1	Virtual	32
6/30/2022	Zero Fare for Better Air Partner Outreach Presentation #2	Virtual	24
6/29/2022	Safety/Community Engagement Update	Denver	4
7/13/2022	Customer appreciation event	Denver	55
7/21/2022	Walk/roll with transportation advocates and residents to discuss transit and accessibility	Denver	15
7/23/2022	LGBTQIA+ Educational and Community Block Party	Aurora	21
7/28/2022	Zero Fare for Better Air Press Event and Kick-off	Denver	130
7/28/2022	Reading in Color Little Free Library Celebration	Denver	34
7/29/2022	Customer outreach event	Thornton	33
8/1/2022	Customer Coffee Chats with RTD Transit Police	Westminster	24
8/3/2022	DenverCity Spirit Luncheon	Denver	126

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
8/4/2022	Adams County Senior Resource Fair	Brighton	132
8/4/2022	N Line updates	Virtual	10
8/5/2022	Customer Coffee Chats with RTD Transit Police	Denver	27
8/9/2022	Transit Experience with APEX Parks and Recreation District	Denver	18
8/9/2022	Flatiron Flyer Ride-Along with Elected Officials	Boulder	20
8/10/2022	Presentation re: Zero Fare for Better Air	Virtual	13
8/10/2022	Customer Coffee Chats with RTD Transit Police	Denver	150
8/11/2022	Customer Coffee Chats with RTD Transit Police	Boulder	46
8/16/2022	Customer Coffee Chats with RTD Transit Police	Lakewood	20
8/17/2022	16th Street Mall Open House	Denver	27
8/19/2022	Walking Tour with Accessibility Committee for People with Disabilities	Denver	2
8/18/2022	Bus to Work Day	Denver	26
8/24/2022	Customer Coffee Chats with RTD Transit Police	Aurora	75
8/10/2022	DenverCity Spirit Luncheon #2	Denver	0
8/24/2022	Zero Fare for Better Air Intercept Surveys	Denver	40
8/25/2022	Zero Fare for Better Air Intercept Surveys	Arvada	30
8/26/2022	Zero Fare for Better Air Intercept Surveys	Denver	26
8/26/2022	Zero Fare for Better Air Intercept Surveys	Denver	20



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
8/29/2022	Zero Fare for Better Air Intercept Surveys	Westminster	20
8/29/2022	Zero Fare for Better Air Intercept Surveys	Greenwood Village	11
8/30/2022	Zero Fare for Better Air Intercept Surveys	Denver	60
9/16/2022	PARK(ing) Day	Denver	30
9/20/2022	Customer Appreciation/Welcome Students Event	Denver	23
9/21/2022	Water School Development and Transportation School Field Trip	Louisville	25
9/23/2022	Walking Tour	Denver	1
9/24/2022	Resource and Career Fair	Denver	11
9/26/2022	Jan. '23 Service Changes Public Meeting #1	Virtual	13
9/27/2022	Jan. '23 Service Changes Public Meeting #2	Virtual	9
9/27/2022	Jan. '23 Service Changes Public Meeting #3	Virtual	9
10/1/2022	Celebrate transit	Denver	14
10/19/2022	Share updates with community and businessmembers	Lakewood	53
10/21/2022	Homecoming Weekend	Denver	35
10/20/2022	TMA Monthly Meeting	Virtual	17
10/20/2022	Fare Study English Community Meeting #3	Virtual	46
10/27/2022	Fare Study Spanish Community Meeting #3	Virtual	41
10/27/2022	Zero Fare to Vote News Conference	Denver	17
11/2/2022	Subregional Service Council Southwest	Virtual	12

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
11/3/2022	Subregional Service Council Northeast	Virtual	12
11/10/2022	Subregional Service Council Southeast	Virtual	12
11/9/2022	Subregional Service Council Northwest	Virtual	11
11/15/2022	Subregional Service Council Boulder	Virtual	12
11/8/2022	Career Learning Day	Denver	142
11/16/2022	Transit Pop-up Event	Denver	15
12/10/2022	Holiday Celebration	Denver	29
12/15/2022	Holiday Celebration	Denver	75
12/21/2022	Monthly Membership Meeting	Arvada	50
1/4/2023	Holiday Happenings at Fitzsimons Station	Aurora	30
1/5/2023	National Western Stock Show Parade	Denver	Unavailable
1/16/2023	MLK Parade	Denver	Unavailable
1/18/2023	Career Convoys with Students	Denver	12
1/12/2023	Customer Advisory Committee Monthly Meeting	Virtual	7
1/20/2023	Denver Office of Special Events Breakfast	Denver	26
1/21/2023	Northwest Rail Peak Service Study Pop-Up	Louisville	25
1/24/2023	Northwest Rail Peak Service Study Pop-Up	Longmont	26
1/25/2023	Northwest Rail Peak Service Study Pop-Up	Broomfield	28
1/31/2023	Northwest Rail Peak Service Study Open House Gunbarrel	Boulder	110
1/28/2023	Economic Forecast Breakfast	Lone Tree	400
2/1/2023	Reimagine RTD and TOD Presentation	Centennial	23

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
2/1/2023	Zero Fare Celebration	Denver	120
2/2/2023	Northwest Rail Peak Service Study Open House	Boulder	80
2/4/2023	Northwest Rail Peak Service Study Pop-Up	Louisville	25
2/6/2023	Moving People Forward Conference	Denver	300
2/10/2023	Winter Bike to Work Day	Boulder	25
2/10/2023	Winter Bike to Work Day	Superior	25
2/10/2023	Winter Bike to Work Day	Denver	89
2/20/2023	RTD on the Slopes	Nederland	36
2/21/2023	May '23 Service Change Public Meeting #1	Virtual	10
2/21/2023	May '23 Service Change Public Meeting #2	Virtual	10
2/22/2023	May '23 Service Change Public Meeting #3	Virtual	13
2/22/2023	Southwest Transit Alliance	Aurora	551
2/16/2023	Monthly TMA Outreach Meeting	Virtual	52
2/8/2023	Citizens Advisory Committee	Virtual	9
3/1/2023	RTD at the Library	Commerce City	26
3/8/2023	Subregional Service Council Elected Official Update	Virtual	86
3/10/2023	PHR Community Health Summit	Commerce City	90
3/11/2023	RTD at the Library	Boulder	17
3/11/2023	RTD @ St. Patrick's Day Parade	Denver	Unavailable
3/13/2023	Mobility for All Meeting	Virtual	26

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
3/15/2023	Career Conversations with RTD	Commerce City	56
3/15/2023	Citizens Advisory Committee	Virtual	10
3/17/2023	RTD on the Slopes	Nederland	21
3/24/2023	RTD in the Community	Denver	45
3/8/2023	Colorado Law Enforcement Job Fair	Thornton	34
4/2/2023	Rocky Mountain Train Show	Denver	225
4/4/2023	ACE CTE Career Fair	Aurora	54
4/6/2023	Rockies Home Opener	Denver	491
4/7/2023	Career Day	Denver	42
4/12/2023	Subregional Service Council	Virtual	13
4/13/2023	Community Roundtable	Denver	22
4/13/2023	Subregional Service Council	Virtual	12
4/13/2023	Customer Advisory Committee	Virtual	15
4/19/2023	Subregional Service Council	Virtual	11
4/19/2023	The Road Ahead	Denver	100
4/19/2023	CO 119 Corridor Communications and Engagement Working Group Presentation	Virtual	20
4/20/2023	Subregional Service Council	Virtual	13
4/20/2023	TMA Monthly Outreach Meeting	Virtual	21
4/24/2023	CO 119 BRT Public Meeting #1	Virtual	11
4/24/2023	CO 119 BRT Public Meetings	Virtual	3
4/25/2023	CO 119 BRT Public Meetings	Virtual	2
4/27/2023	Subregional Service Council	Virtual	15

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
4/25/2023	Fare Study Pop-Up	Lone Tree	9
4/26/2023	Fare Study Pop-Up	Greenwood Village	39
4/29/2023	Five Star Wellness Festival	Brighton	169
4/29/2023	Respect the Ride Community Event	Denver	65
4/27/2023	Watershed School Community Celebration	Boulder	54
5/2/2023	Fare Study Virtual Meeting Spanish	Virtual	10
5/2/2023	DRMAC Member Meeting	Virtual	16
5/2/2023	Fare Study Pop-Up	Denver	60
5/3/2023	Fare Study Virtual Meeting English	Virtual	14
5/3/2023	Fare Study Pop-Up	Westminster	50
5/3/2023	Zero Fare Collaboration Meeting	Virtual	32
5/4/2023	Fare Study Pop-Up	Denver	80
5/6/2023	Cinco de Mayo Festival	Denver	340
5/10/2023	Advisory Committee for People with Disabilities	Virtual	19
5/9/2023	Fare Study Pop-Up	Littleton	13
5/13/2023	Older Adults Wellness and Resources Fair	Lakewood	115
5/11/2023	Fare Study Pop-Up	Westminster	21
5/14/2023	Viva Streets Denver	Denver	150
5/16/2023	RTD at the Broomfield Public Library	Broomfield	159
5/8/2023	Civic Academy	Denver	40
5/16/2023	Fare Study and Equity Analysis	Virtual	3
5/16/2023	Fare Study and Equity Analysis	Virtual	10

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
5/13/2023	Civic Academy	Denver	30
5/18/2023	NACTO Conference	Denver	30
5/20/2023	Food Truck Carnival	Northglenn	66
5/20/2023	Adams County Connect Summer Kick-Off	Denver	103
5/20/2023	Sun Valley Night Market	Denver	113
5/23/2023	Fare Study Pop-Up	Arvada	14
5/24/2023	Premier Members Credit Union Smart Commute Fair	Broomfield	7
5/24/2023	Fare Study Pop-Up	Lakewood	16
5/24/2023	Boulder County Farmers Markets	Boulder	73
5/11/2023	Fare Study Open House Downtown	Denver	15
5/17/2023	Fare Study Open House Colfax	Denver	24
5/30/2023	Talus Resource Fair	Lone Tree	9
5/29/2023	Memorial Day Parade	Commerce City	Unavailable
5/15/2023	September Service Change Public Meeting	Virtual	Unavailable
5/15/2023	September Service Change Public Meeting	Denver	Unavailable
5/16/2023	September Service Change Public Meeting	Virtual	Unavailable
6/3/2023	Touch-a-Truck	Louisville	200
6/10/2023	Thriving CommUNITY Fair	Aurora	200
6/15/2023	RTD in the Community	Denver	40
6/16/2023	Citizen Advisory Committee	Virtual	8
6/19/2023	Juneteenth Parade	Denver	Unavailable
6/20/2023	World Refugee Day at Mosaic Community	Denver	15



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
6/21/2023	Bike to Highlands	Denver	16
6/28/2023	Bike to Work Day	Denver	335
6/28/2023	Bike to Work Day	Greenwood Village	70
6/28/2023	Bike to Work Day	Boulder	50
6/25/2023	PRIDE Parade	Denver	Unavailable
6/22/2023	Zero Fare for Better Air Kick-Off	Denver	100
7/6/2023	Gang of 19 Plaque Rededication	Denver	45
7/10/2023	Boulder Mobility Access Coalition Monthly Meeting	Virtual	27
7/15/2023	Train to Trails	Greenwood Village	0
7/17/2023	Subregional Service Council	Virtual	36
7/18/2023	Subregional Service Council	Virtual	13
7/20/2023	Northglenn State of the City	Northglenn	10
7/20/2023	Subregional Service Council	Virtual	107
7/21/2023	Community Connect	Denver	11
7/25/2023	Customer Appreciation Event	Longmont	114
7/26/2023	Subregional Service Council	Virtual	11
7/26/2023	Brewability Open House	Englewood	8
7/26/2023	APEX Parks and Rec. Train Ride	Denver	11
7/27/2023	Denver Chamber's State of the City	Denver	Unavailable
7/27/2023	Subregional Service Council	Virtual	11
7/29/2023	Association for Commuter Transportation Conference	Outside of District	631
7/27/2023	Peak Consulting Open House	Lakewood	23

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
7/13/2023	Citizen Advisory Committee	Virtual	6
7/25/2023	Transit Day	Arvada	14
7/25/2023	Transit Day	Boulder	36
7/26/2023	Transit Day 2.0	Lakewood	10
8/2/2023	National Night Out	Denver	100
8/3/2023	DenverSouth Suburban Mobility Summit	Lone Tree	150
8/4/2023	Viva Streets	Denver	339
8/9/2023	CALC Community Update	Virtual	8
8/12/2023	Second Saturday Festival	Arvada	286
8/16/2023	Customer Appreciation Event	Louisville	30
8/19/2023	Global Fest	Aurora	587
8/7/2023	HOPE Grant Focus Group	Denver	8
8/3/2023	Adams County Senior Resource Fair	Brighton	130
8/9/2023	Zero Fare for Youth Media Event	Denver	25
8/16/2023	Hearts and Gears	Golden	374
8/29/2023	Community Power Hour	Virtual	37
8/29/2023	Transit Experience	Denver	9
8/30/2023	Commuting Solutions Summit	Longmont	80
8/24/2023	Back to School Night	Commerce City	27
8/31/2023	Zero Fare Celebration	Denver	67
8/31/2023	Innov8x	Golden	7
8/28/2023	RTD at the Belmar Library (with DenverStreets Partnership)	Lakewood	0
8/26/2023	Servicios de la Raza Gala	Denver	600

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
9/1/2023	How to Ride Presentation	Commerce City	17
9/10/2023	The Ways We Travel	Virtual	51
9/14/2023	Zero Fare for Better Air Presentation	Outside of District	28
9/14/2023	Function in the Junction	Boulder	47
9/16/2023	Rhythm at Roosevelt	Longmont	151
9/20/2023	Lincoln/Broadway Corridor Registered Neighborhood Organization Meeting	Virtual	24
9/20/2023	Boulder Transportation Connections Quarterly Meeting	Boulder	30
9/23/2023	Hometown Fest	Edgewater	37
9/27/2023	DDP Block Party	Denver	103
9/30/2023	Safety Fair	Arvada	333
9/11/2023	Colorado Association of Transit Agencies Conference	Outside of District	200
9/18/2023	Rail Safety Week	Thornton	22
9/21/2023	Monthly TMA Outreach Meeting	Virtual	18
9/19/2023	How to Ride Presentation	Niwot	18
9/21/2023	Colorado Athletic Club Pop-Up	Denver	6
9/23/2023	LouisvilleFarmers Market	Louisville	103
9/25/2023	Service Change Public Meeting #1	Virtual	5
9/25/2023	Service Change Public Meeting #2	Denver	8
9/26/2023	Service Change Public Meeting #3	Virtual	5
9/12/2023	Citizen Advisory Committee	Virtual	11
9/15/2024	Innov8x Course	Golden	4

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
10/3/2023	DenverRegional Mobility and Access Council	Virtual	26
10/4/2023	DenverRegional Council of Governments' "All In" Awards Dinner	Denver	600
10/4/2023	Thornton High School Family Outreach	Thornton	100
10/4/2023	Hispanic Contractors of Colorado Infrastructure Committee Monthly Meeting	Virtual	18
10/4/2023	Customer Appreciation Event with Commuting Solutions	Boulder	61
10/4/2023	Food Distribution	Aurora	30
10/5/2023	Emily Griffith High School Resource Fair	Denver	32
10/6/2023	Colorado Asian Chamber of Commerce's Annual Gala	Outside of District	250
10/10/2023	Colorado Department of Transportation Hispanic Heritage Month Celebration	Denver	60
10/10/2023	SNAP to Success Job Fair	Aurora	35
10/11/2023	Customer Appreciation Event	Boulder	60
10/11/2023	Westwood Community Center Grand Opening	Denver	350
10/11/2023	CCA Resource Days	Aurora	0
10/13/2023	Three Creeks K-8 School, speaking event to 3rd graders	Arvada	25
10/14/2023	Arapahoe Parks and Recreation District Touch-a-Truck	Aurora	873

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
10/14/2023	Filipino America Association Colorado Chapter's Filipiana Gala	Denver	500
10/14/2023	Mo Betta Greens Farmers Market	Denver	60
10/16/2023	RTD's Small Business Opportunity Office Orientation to the State's Minority Business Office	Denver	34
10/18/2023	Jefferson County Public Schools 10th Grade Career Expo	Lakewood	176
10/19/2023	Hispanic Contractors of Colorado Small Business Roundtable	Virtual	12
10/19/2023	Colorado Black Roundtable Social Equity Summit	Denver	80
10/21/2023	The annual Gaining Ground in the Black Community Social Equity Summit	Aurora	50
10/22/2023	Mo Betta Greens Farmers' Market	Denver	22
10/22/2023	Westy Fest	Westminster	222
10/24/2023	How to Ride Presentation (Walker Daycare)	Englewood	7
10/24/2023	Urban League of Metro DenverHispanic Heritage Month Celebration	Aurora	42
10/25/2023	RTD at the Anythink Commerce CityLibrary	Commerce City	6
10/25/2023	RTD's Small/Disadvantaged Business Enterprise Advisory Council	Virtual	85
10/25/2023	BOOnion Station	Denver	1112
10/25/2023	Senior Support Services	Denver	20

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
10/26/2023	Innov8x Course	Golden	4
10/26/2023	CDOT Transportation Demand Management Conference	Denver	200
10/27/2023	National Federation of the Blind State Convention	Lone Tree	300
10/27/2023	DenverPublic Schools' Southeast Community Hub Event	Denver	50
10/28/2023	National Federation of the Blind of Colorado Banquet	Lone Tree	300
10/31/2023	Northwest Rail Line Community Based Organizations Workshop	Broomfield	55
11/1/2023	Hispanic Contractors of Colorado Infrastructure Committee	Virtual	18
11/2/2023	Innov8x Class Zero Fare for Youth Project	Golden	4
11/2/2023	Adult Learner & Resource Fair	Aurora	17
11/3/2023	How to Ride Presentation - Longmont High School	Longmont	15
11/3/2023	Asian Chamber of Commerce Cultural Experience	Denver	60
11/4/2023	2023 Colorado LGBTQ Chamber of Commerce Awards Reception	Denver	300
11/6/2023	Benefits fair at City of Lone Tree	Lone Tree	20
11/7/2023	Holiday Happenings - Olde Town Arvada Station	Arvada	38
11/8/2023	How to Ride Presentation - Main Street School	Longmont	17



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
11/8/2023	How to Ride Presentation - Skyline High School	Longmont	10
11/8/2023	Northwest Rail Peak Service Study Open House	Longmont	26
11/8/2023	Kestrel Drop-in Cafecito	Louisville	22
11/8/2023	2024 Benefits Fair Event	Denver	25
11/8/2023	Benefits Fair at City of Lone Tree	Lone Tree	30
11/8/2023	Minority Business Office Lunch Talk	Virtual	31
11/9/2023	Northwest Rail Peak Service Study Open House #2	Broomfield	100
11/9/2023	Adams County 8th Grade Career Fair	Denver	60
11/14/2023	RTD Tabling at Red Rocks Community College	Arvada	16
11/14/2023	DenverPublic Schools 8th Grade Career Fair	Denver	250
11/14/2023	Black Construction Group Monthly Meeting	Denver	30
11/15/2023	DenverHousing Authority Safety Open House	Denver	100
11/15/2023	How to Ride presentation with Silver Creek High School	Longmont	19
11/15/2023	Auraria Campus Safe Night	Denver	20
11/15/2023	Hope Communities Food Distribution	Denver	20
11/16/2023	Holiday Happenings - Peoria Station	Aurora	182
11/16/2023	Hispanic Contractors of Colorado Small Business Roundtable	Virtual	20
11/16/2023	African Chamber of Commerce Monthly Event	Denver	20

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
11/20/2023	Holiday Happenings - Union Station (Light Rail side)	Denver	177
11/20/2023	Grand Illumination at Denver Union Station	Denver	800
11/20/2023	African Community Center Refugee First Thanksgiving	Denver	300
11/22/2023	Senior support services	Denver	10
11/23/2023	Urban Peak Youth and LiVE outreach	Denver	5
11/29/2023	Holiday Happenings - I-25/Broadway Station	Denver	145
11/29/2023	District 5 Coffee with Cops	Denver	25
11/29/2023	How to Ride presentation with Main Street High School	Longmont	11
11/30/2023	TMA New Year Kick-Off	Denver	19
11/30/2023	Colorado Women's Chamber of Commerce Community Day and Holiday Market	Denver	60
12/2/2023	9News Parade of Lights	Denver	Unavailable
12/5/2023	Colorado School of Mines Innov8x Course Presentation	Golden	30
12/5/2023	Minority Business Office and State Procurement Office of Colorado Procurement Expo	Outside of District	400
12/6/2023	Hispanic Contractors of Colorado Infrastructure Committee	Virtual	10
12/7/2023	Holiday Happenings - Civic Center Station	Denver	282
12/7/2023	Church of St. Francis Survey Outreach	Denver	120

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
12/7/2023	DenverStreet Partners End of Year Celebration	Denver	35
12/7/2023	Colorado Women's Chamber of Commerce Athena Awards	Denver	130
12/7/2023	Colorado-DenverLaw Enforcement Hiring Expo	Denver	150
12/9/2023	Athletics and Beyond Awards	Denver	75
12/12/2023	Holiday Happenings - Downtown Boulder Station	Boulder	103
12/13/2023	Colorado Black Roundtable Diversity, Equity and Inclusion at DEN	Denver	42
12/13/2023	Hispanic Contractors of Colorado Holiday Social	Denver	100
12/13/2023	City of AuroraMeeting	Aurora	35
12/14/2023	The Opportunity Council 2023 Holiday Networking Luncheon	Englewood	125
12/18/2023	Holiday Happenings - Union Station (Commuter Rail side)	Denver	186
12/18/2023	Safety and Fare Structure at East Metro	Aurora	20
12/19/2023	AFC+A and CREA Results' Promotores Verdes Gratitude Celebration	Denver	85
12/20/2023	Una Mano Una Esperanza's Christmas in the Community	Denver	425
12/21/2023	TMA December 2023 Meeting	Virtual	17
1/4/2024	National Western Stock Show Kick-Off Parade	Denver	Unavailable

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
1/9/2024	Commuting Solutions Legislative Breakfast	Boulder	175
1/12/2024	Dr. Martin Luther King, Jr. Business Awards	Denver	350
1/14/2024	Commerce City Operations Meeting	Commerce City	27
1/17/2024	Hispanic Contractors of Colorado General Monthly Meeting	Denver	40
1/19/2024	Meet and Greet with Adams 12 Schools	Denver	30
1/24/2024	Aurora Central High School Career Fair	Aurora	65
1/26/2024	OSE Annual Special Events Forum	Denver	150
1/27/2024	RTD at the George Reynolds Library	Boulder	65
1/27/2024	Filipino American Community of Colorado	Denver	275
1/30/2024	Denver District 5 Project Night	Denver	37
1/31/2024	Lyft Community Ride	Denver	20
2/2/2024	Valentine's Day Outreach, Union Station Light Rail Platform	Denver	69
2/3/2024	Rocky Mountain Asphalt Expo	Denver	1000
2/5/2024	Valentine's Day Outreach, Civic Center Station	Denver	36
2/5/2024	Southwest Transit Association Conference	Outside of District	522
2/5/2024	Ideas in Action Presentation	Outside of District	50
2/7/2024	Valentine's Day Outreach, Union Station Commuter Rail Platform	Denver	31
2/7/2024	Metropolitan State University Safety Event	Denver	55

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
2/9/2024	Winter Bike to Work Day	Denver	211
2/12/2024	American Public Transit Association Marketing, Communications, and Customer Experience Workshop	Outside of District	400
2/12/2024	APTA Community Engagement Strategies Round Table	Outside of District	48
2/13/2024	Iowa Elementary School Presentation	Aurora	15
2/13/2024	Transit Champions in Action Panel	Outside of District	100
2/13/2024	US DOT Labor Compliance Presentation	Virtual	54
2/14/2024	Colorado Women's Chamber of Commerce Founder's Forum	Denver	10
2/15/2024	TMA Quarterly Call	Virtual	13
2/15/2024	DenverNorth Business Association Annual Meeting	Denver	50
2/15/2024	Transit Assistance Grant Program Virtual Presentation Q&A Session	Virtual	60
2/15/2024	Community Crime Prevention Coalition with District 5	Denver	155
2/16/2024	Harlem of the West Renaissance Photoshoot and Book Release	Denver	75
2/19/2024	Vance Street Flats Tour	Arvada	3
2/21/2024	Access-a-Ride	Highlands Ranch	50
2/21/2024	Colorado Black Round Table Monthly Black Business Meet & Greet	Denver	40

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
2/21/2024	Hispanic Contractors of Colorado General Monthly Meeting	Denver	40
2/21/2024	DenverYouth on Transportation Coalition Build	Denver	109
2/22/2024	Rooney Ranch KinderCare Presentation	Lakewood	50
2/23/2024	Colorado Public Health Parks and Recreation Summit	Northglenn	170
2/23/2024	AuroraPublic Schools Hinkley High School Career Fair	Aurora	250
2/24/2024	NAACP Freedom Fund Gala	Denver	450
2/24/2024	DenverProfessionals Chapter of the National Society of Black Engineers We are Black History Banquet	Denver	75
2/27/2024	RTD at the Broomfield Library	Broomfield	41
2/27/2024	Empowerment program lunch and learn	Virtual	25
2/28/2024	Colfax BRT Open House	Denver	150
2/28/2024	Boulder and RTD-PD Meeting	Denver	5
2/29/2024	Littleton City Council	Littleton	20
2/29/2024	Colorado Women's Chamber of Commerce State of Women in Business	Denver	300
3/1/2024	Asian Chamber of Commerce Cultural Experience	Denver	45
3/1/2024	AuroraPublic Schools AuroraWest College Prep Career Fair	Aurora	250



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
3/2/2024	Empowering Communities Globally Travel Training with DenverRegional Mobility & Access Council	Denver	67
3/2/2024	Hispanic Contractors of Colorado 2024 Annual Awards Gala	Denver	900
3/6/2024	May 2024 Service Change Public Meeting #1	Virtual	20
3/6/2024	May 2024 Service Change Public Meeting #2	Denver	10
3/6/2024	LiVE Expansion Presentation	Virtual	60
3/7/2024	Service Change Public Meeting #3	Virtual	22
3/7/2024	Servicios de la Raza - Migrant Assistance Aid	Denver	150
3/7/2024	Rocky Mountain Land Use Institute Western Places   Western Spaces Conference (3/7-3/8)	Denver	300
3/12/2024	Black Contruction Group Meeting	Denver	25
3/13/2024	Hope Communities Bi-Weekly Navigation Meeting	Denver	10
3/13/2024	Connect 2 Impress Career Fair	Denver	30
3/16/2024	St. Patrick's Day Parade	Denver	Unavailable
3/18/2024	Transit Employee Appreciation Day	Boulder	100
3/20/2024	Community Conversations with Morgridge Elementary School	Denver	38
3/26/2024	Spring Career and Internship Fair at Regis University	Denver	60

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
3/28/2024	Colorado Women's Chamber of Commerce Powerful Voices Conversation Series	Denver	50
3/28/2024	LGBTQ Business After Hours	Denver	35
3/28/2024	Bus Operator Hiring Event at the Crowne Plaza Airport Convention Center	Denver	50
4/1/2024	Rail Reconstruction and Coping Panel Community Open House	Lone Tree	6
4/5/2024	Colorado Rockies Home Opener	Denver	821
4/6/2024	Ride-Along with the Spring Institute	Denver	21
4/6/2024	RTD on the Soccer Field with the Spring Institute	Aurora	20
4/8/2024	Federal BRT Pop-Up at Hadley Branch Library	Denver	12
4/9/2024	Black Construction Group Monthly Meeting	Denver	15
4/11/2024	Hope Communities Resources	Denver	20
4/13/2024	City & County of Denver2024 Youth Block Party	Denver	1000
4/16/2024	Adams 12 Five Star Schools Newcomers Resource Fair	Thornton	250
4/17/2024	RTD Public Information Office Briefing	Virtual	50
4/17/2024	Light Rail Reconstruction Project Open House	Denver	8
4/17/2024	Colorado Black Round Table Black Business Monthly Meet and Greet	Denver	60

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
4/17/2024	Hispanic Contractors of Colorado General Monthly Meeting	Denver	50
4/18/2024	TMA Monthly Meeting	Virtual	23
4/19/2024	West Washington Park Neighborhood Association Annual Meeting	Denver	25
4/19/2024	Downtown Rail Reconstruction Project Kick-Off Meeting	Virtual	96
4/23/2024	RTD at the Boulder Public Library	Boulder	60
4/24/2024	Cushman & Wakefield Earth Day Event	Denver	100
4/24/2024	Glenarm Rail Reconstruction Project Open House	Denver	3
4/24/2024	RTD Civil Rights Division's Small Business Opportunity Office - S/DBEAC - B2G Now	Virtual	176
4/24/2024	Senior Support Services	Denver	25
4/25/2024	The Road Ahead Summit	Denver	150
4/25/2024	Career Day at Colorado Early Colleges	Aurora	25
4/26/2024	Career Day at Valverde Elementary School	Denver	42
4/30/2024	East Denver Rail Reconstruction and Coping Panel Projects Community Open House	Denver	0
5/1/2024	Reading and Recreation	Denver	163
5/2/2024	Community Conversations	Denver	175

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
5/3/2024	DCPA 'Where Did We Sit on the Bus?' Student Presentation	Denver	200
5/3/2024	Cafe con el Director @ Bryant Webster Dual Language School	Denver	15
5/4/2024	Cinco de Mayo Parade	Denver	Unavailable
5/6/2024	Transportation and Land Use Presentation to William Smith HS	Aurora	27
5/6/2024	Jewish Family Services	Denver	50
5/7/2024	Transportation and Disability Rights Presentation	Northglenn	80
5/7/2024	DRMAC Quarterly Meeting	Virtual	17
5/8/2024	Walk & Roll	Denver	35
5/9/2024	Federal BRT Open House	Englewood	27
5/9/2024	Servicios de la Raza Newcomer Resource Fair	Denver	150
5/9/2024	Amplifying the Voices of Colorado Asian Professionals (in Celebration of AANHPI Heritage Month)	Denver	64
5/11/2024	AAPI Festival	Denver	75
5/11/2024	Asian Roundtable of Colorado AAPI Culture Fest	Denver	300
5/13/2024	Federal BRT Denver Open House	Denver	73
5/15/2024	Federal BRT Open House	Westminster	50
5/15/2024	Focus Point Transportation Resource Fair	Denver	40
5/15/2024	HCC GM Dinner (Monthly Meeting)	Denver	40

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
5/15/2024	ACC - Monthly Meeting	Denver	35
5/16/2024	Where Did We Sit on the Bus?	Denver	185
5/16/2024	Colorado Procurement Technical Assistance Center- B2G - Business to Government	Aurora	17
5/16/2024	DRCOG May TMA Meeting	Virtual	10
5/16/2024	DEDO Newcomer Job Fair	Denver	60
5/17/2024	Place Bridge Academy Career Day	Denver	51
5/17/2024	Almost Home LIVE Presentation	Virtual	Unavailable
5/18/2024	Women United Village	Denver	Unavailable
5/20/2024	Rail Reconstruction Board of Directors Walking Tour	Denver	22
5/21/2024	Department of Human Services Shelter Outreach and Info Session	Denver	120
5/22/2024	Bryant-Webster Dual Language School, Bryant-Webster and RTD: Transit Options for Bryant-Webster Families	Denver	5
5/23/2024	Emily Griffith Spring Fling	Denver	20
5/23/2024	Black Chamber of Commerce Mixer	Denver	35
5/23/2024	Black Chamber of Commerce Mixer	Denver	35
5/24/2024	Village Exchange Center-Health and Resource Fair	Aurora	150
5/27/2024	Memorial Day Parade	Commerce City	Unavailable

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
5/30/2024	Colorado LGBTQ Chamber of Commerce Business After Hours	Denver	25
5/31/2024	City and County of Denver Office of Immigrant and Refugee Affairs, My City Academy Resource Tabling and Presentation	Denver	15
6/1/2024	Louisville Touch-a-Truck	Louisville	655
6/2/2024	Travel Training with the Afghan Circle of Fathers	Denver	50
6/4/2024	West Washington Park Neighborhood Association Meeting	Denver	17
6/5/2024	Colorado History Rides / History of RTD	Denver	30
6/6/2024	Denver South Partnership Meeting	Greenwood Village	90
6/6/2024	HCC Golf Tournament	Lakewood	300
6/7/2024	B.E.S.T - Black Economic Success Trust, Biz Matchmaker/ Resource Fair	Denver	150
6/8/2024	BrewHAHA Broomfield	Broomfield	100
6/8/2024	FACC- Padayon Philippine Festival	Edgewater	300
6/11/2024	Lone Tree Library Story Time	Lone Tree	140
6/13/2024	Customer/Citizen Advisory Committee Monthly Meeting	Virtual	6
6/14/2024	Bus History Association Presentation	Denver	37
6/14/2024	Brighton Resource Fair	Brighton	20



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
6/14/2024	2024 Black Excellence Mixer-Colorado Men of Color Collaborative	Denver	110
6/15/2024	Juneteenth Parade	Denver	1000
6/15/2024	30th Annual Philippine Padayon Festival	Englewood	300
6/19/2024	September 2024 Service Change Presentation to Lincoln Broadway Neighborhood	Denver	9
6/20/2024	World Refugee Day	Denver	50
6/20/2024	World Refugee Day	Denver	100
6/21/2024	Discussion with City of Khmelnytskyi, Ukraine Official	Denver	2
6/22/2024	Heal the Hood Annual Event	Denver	200
6/23/2024	Pride Parade	Denver	500000
6/24/2024	September Service Change Virtual Office Hours	Virtual	7
6/24/2024	Hiring Fair through DenverWorkforce Center	Denver	20
6/26/2024	Bike to Work Day	Denver	275
6/28/2024	RTD LiVE Open House @ Village Exchange Center	Aurora	50
6/29/2024	3rd Annual Athletics' and Beyond Celebration Resource Fair	Denver	75
7/9/2024	RTD Union Station Hiring Fair	Denver	50
7/11/2024	ACPD / APAC Joint Meeting	Virtual	23
7/11/2024	Gang of 19 Panel at Atlantis Community	Denver	25
7/13/2024	LiVE Open House La Raza Holistic Health Fair	Denver	100

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
7/15/2024	50 Millionth A Line Customer Celebration at DIA	Denver	300
7/16/2024	A Line 50mm Customer Celebration at Peoria Station	Aurora	184
7/16/2024	A Line 50 Millionth Customer Press Event	Denver	50
7/16/2024	2nd Chance Hiring Fair	Lakewood	50
7/17/2024	A Line 50 Millionth Customer Celebration at Central Park Station	Denver	200
7/18/2024	A Line 50 Millionth Customer Celebration at DUS	Denver	300
7/20/2024	60 Years of Civil Rights: A Community Mixtape Celebration	Denver	175
7/22/2024	Mayor State of the City Address Block Party	Denver	140
7/23/2024	Colfax BRT Community Meeting	Denver	110
7/26/2024	HCC-GMM Meeting	Lone Tree	50
7/27/2024	Virginia Village Library Summer of Adventure	Denver	43
7/31/2024	Platte Division Bus Operator Hiring Fair	Denver	40
8/1/2024	The Fax Back to School Fair	Denver	100
8/1/2024	Adams County Senior Resource Fair	Brighton	178
8/2/2024	HCC Women In Leadership Committee Monthly Meeting	Denver	15
8/2/2024	Sabor - Hispanic Chamber of Commerce	Denver	2500

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
8/3/2024	West Colfax Neighborhood Festival	Denver	177
8/3/2024	West Colfax Neighborhood Block Party	Denver	800
8/5/2024	Zero Fare for Better Air presentation at ACT Conference	Denver	30
8/5/2024	Commuter Rail Presentation at ACT Conference	Denver	8
8/6/2024	Creative Placemaking through Transit and People-Focused Design	Arvada	30
8/6/2024	National Night Out	Denver	200
8/7/2024	Thornton High School Back to School Night	Thornton	750
8/8/2024	Adams 14 School Board Meeting	Commerce City	39
8/8/2024	AuroraCentral High School Back to School Night	Aurora	500
8/10/2024	Arapahoe County Vet Connect Resource and Job Fair	Aurora	35
8/10/2024	Montbello 2020 Resource Fair	Denver	600
8/10/2024	City of Thornton Back to School Event	Thornton	500
8/11/2024	2024 The Power of Poison and Pot Luck	Denver	5
8/13/2024	BCG Monthly Special Interest Group Meeting	Denver	16
8/14/2024	CWCC Founder's Forum	Denver	13
8/17/2024	Grace City Church Unhoused Outreach Event	Denver	150
8/20/2024	Mobility for All August Meeting	Boulder County	26

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
8/21/2024	Adams 12 Five Star Schools Board Meeting	Thornton	60
8/21/2024	HCC Annual A/E/C Tradeshow & BBQ	Denver	175
8/22/2024	WTS Summer Social	Denver	175
8/22/2024	2024 WTS Colorado Summer Social	Denver	325
8/23/2024	Colorado Christian University New Student Orientation	Lakewood	62
8/24/2024	Englewood Block Party	Englewood	1000
8/26/2024	DenverPublic Schools Board Meeting	Denver	56
8/27/2024	Sustainable Transportation Summit	Longmont	160
8/28/2024	Being Successful Working with Governmental Agencies and Small Business Awards	Denver	416
8/29/2024	Servicios de La Raza :Xochitl Newcomer Distribution	Denver	50
8/30/2024	Transit to Wellness Expo	Denver	30
8/31/2024	International Family Engagement Event	Aurora	160
9/2/2024	M&M Property Management HOA meeting	Denver	15
9/4/2024	Customer Appreciation Event	Boulder	23
9/4/2024	RMCAD Resource Fair	Lakewood	50
9/4/2024	Arapahoe at Village Center Station Impact Meeting	Greenwood Village	20
9/4/2024	DenverDistrict 2 Meeting	Denver	100
9/4/2024	2024 RMCAD Resource + Job Fair	Denver	100
9/7/2024	WTS Girl Scout Mobility Day	Denver	20

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
9/9/2024	Swigert International School - How to Ride Presentation	Denver	125
9/9/2024	Wadsworth Station Local Meeting	Lakewood	10
9/10/2024	Golden Rotary Club Presentation	Golden	40
9/11/2024	St. Vrain Valley School Board Meeting	Longmont	18
9/12/2024	Jefferson County Public Schools Board Meeting	Golden	17
9/12/2024	Personal Assistance Services of Colorado (PASCO) Networking Event	Englewood	35
9/12/2024	Women Transportation Seminar (WTS) - Unlock Your Leadership Potential	Denver	30
9/14/2024	Community Celebration at Comun	Denver	30
9/17/2024	Adams County 8th Grade Career Expo	Brighton	1000
9/17/2024	Adams County 8th Grade Expo	Brighton	100
9/17/2024	Adams County 8th Grade Career Expo Fair	Brighton	1200
9/18/2024	Anschutz Block Party	Aurora	1000
9/18/2024	Adam's County 8th Grad Expo	Brighton	100
9/18/2024	Denver Public Schools (DPS) Reverse Trade Fair	Denver	275
9/19/2024	Montbello Workforce Center	Denver	30
9/19/2024	Gabbing w/Gabe and Gisa A Community Listening Session	Englewood	5
9/21/2024	Mid-Autumn Festival - Far East Center	Denver	343

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
9/21/2024	Northwest AuroraNeighborhood Resource Fair	Aurora	240
9/21/2024	Far East Center Mid Autumn Festival	Denver	375
9/21/2024	Mid Autumn Festival	Denver	1000
9/21/2024	Nat. Youth Transportation Equity Convening	Denver	600
9/23/2024	Rail Safety Week Outreach - 40th and Colorado Station	Denver	Unavailable
9/24/2024	Rail Safety Week Outreach - DenverUnion Station	Denver	Unavailable
9/25/2024	APS Public Schools Welcome Center - How to Ride Presentation	Aurora	80
9/25/2024	Rail Safety Week Outreach - Peoria Station	Aurora	Unavailable
9/25/2024	CU DenverFall Internship and Job Fair	Denver	70
9/26/2024	Transportation and Construction GIRL Day	Golden	130
9/26/2024	Transportation and Construction GIRL Day	Golden	1200
9/26/2024	Monthly Colorado Black Chamber of Commerce Meeting- RTD SBE Certifications	Denver	16
9/26/2024	LGBTQ Business After Hours	Denver	30
9/27/2024	Rail Safety Week - Alameda Station	Denver	15
9/30/2024	Welcome Back to Downtown Denver	Denver	15
10/1/2024	University of DenverWeek Without Driving Event: Transit Celebration	Denver	85



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
10/3/2024	APA Colorado Annual Conference panel: The Changing Face of Transit in Colorado	Outside of District	50
10/4/2024	Colfax Bus Rapid Transit Groundbreaking Ceremony	Denver	200
10/5/2024	30th Anniversary Light Rail Celebration	Denver	300
10/10/2024	Citizen Advisory Committee October Meeting	Virtual	10
10/10/2024	Personal Assistance Services of Colorado Networking Event	Englewood	35
10/11/2024	Bronco's Stadium Job Fair	Denver	125
10/11/2024	Colorado Inclusive Economy & DEI Leadership Institute 2024 Annual Summit	Aurora	250
10/15/2024	Veteran's Affairs White Cane Safety Day	Aurora	35
10/15/2024	Asian Chamber of Commerce Business After Hours	Denver	30
10/16/2024	Emily Griffith Technical School Career Fair	Denver	65
10/17/2024	Arapahoe Community College Police Recruiting Event	Denver	10
10/17/2024	Colorado Black Round Table Doing Black Business in Colorado	Denver	85
10/21/2024	Mpact Annual Conference Affordable Housing Policy Update: TOD at Different Scales	Outside of District	50
10/21/2024	Mpact Annual Conference: TOD Practitioners Forum	Outside of District	50

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
10/23/2024	January 2025 Proposed Service Changes Office Hours	Virtual	4
10/24/2024	BOOnion Station	Denver	417
10/24/2024	MSU Fall Job and Internship Fair	Denver	70
10/24/2024	National Federation of the Blind Convention	Lone Tree	51
10/25/2024	Zero Fare to Vote Media Event	Denver	12
10/25/2024	Future Housing Coalition Workshop	Denver	50
10/26/2024	Trick or Treat Street at Warder Elementary School	Arvada	619
10/26/2024	Warder Elementary School	Arvada	400
10/26/2024	National Federation of the Blind-Colorado Gala	Lone Tree	100
11/1/2024	Transit Cross-Agency Coalition Zero Fare Presentation	Virtual	14
11/2/2024	Hecho en Westwood-Cultural Festival	Denver	114
11/2/2024	Hope House - Teen Mom Entrepreneurship, Grow With Us Gala	Denver	600
11/5/2024	E Line Customer Appreciation Event	Lone Tree	46
11/5/2024	Customer Appreciation	Lone Tree	100
11/9/2024	LGBTQ Chamber of Commerce, Annual Gala	Denver	450
11/12/2024	Washington Park East Registered Neighborhood Organization Meeting	Denver	21
11/13/2024	How to Ride Demonstration with Bixby School	Boulder	86

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
11/13/2024	Customer Appreciation Event with Boulder Chamber Transportation Connections	Boulder	150
11/13/2024	Jeffco Public Schools Transition Resource Fair	Golden	63
11/19/2024	Career Explorations	Highlands Ranch	3
11/19/2024	Thunder Ridge HS Career Information Session	Highlands Ranch	2
11/20/2024	Thankful for our Bus Drivers Storytime	Boulder	18
11/20/2024	DenverPublic Schools 8th Grade Career Fair	Denver	178
11/20/2024	DenverPublic Schools 8th Grade Career Fair - Day 1	Denver	178
11/25/2024	African Community Center First Thanksgiving	Denver	450
12/2/2024	Candy Cane Outreach: Peoria Station	Aurora	36
12/3/2024	Candy Cane Outreach: Eastlake & 124th	Thornton	20
12/5/2024	Candy Cane Outreach: University of DenverStation	Denver	10
12/6/2024	Hiawatha Davis Jr. Luncheon	Denver	96
12/7/2024	9News Parade of Lights	Denver	Unavailable
12/10/2024	Windsor Gardens Resource Fair	Denver	50
12/11/2024	CO 119 Stakeholder Workshops #1	Boulder	7
12/11/2024	Proposed Access-on-Demand Changes Public Meeting #1	Virtual	63

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
12/12/2024	Proposed Access-on-Demand Changes Public Meeting #2	Virtual	55
12/14/2024	RTD Gives: Customer Donation Collection at Downtown Boulder Station	Boulder	23
12/14/2024	RTD Gives: Customer Donation Collection at Union Station	Denver	20
12/14/2024	RTD Gives: Customer Donation Collection at Littleton/Downtown Station	Littleton	16
12/19/2024	Colorado Hispanic Chamber of Commerce - End of Year Holiday Event	Denver	200
12/19/2024	Holidays en la Comunidad	Denver	2,100
12/20/2024	Atlantis Community Holiday Party	Denver	35
12/21/2024	Christmas Soups for the Homeless	Denver	300
1/7/2025	Paratransit Proposed Changes Public Meeting #3	Virtual	93
1/9/2025	National Western Stock Show Parade	Denver	2,500
1/11/2025	Celebrate MLK Jr. Day and Induction of New Denver NAACP Officers	Denver	42
1/13/2025	Impact Team at I-25 and Broadway	Denver	N/A
1/13/2025	Impact Team at Colfax at Auraria	Denver	N/A
1/14/2025	Impact Team at I-25 and Broadway	Denver	N/A
1/14/2025	Impact Team at Colfax at Auraria	Denver	N/A
1/14/2025	Federal BRT Pop-Up at Englewood Public Library	Englewood	7
1/14/2025	Economic Development Association for Black Communities, Empowering our Future Breakfast	Denver	30

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
1/14/2025	Denver Public Schools HVAC Contractors Event	Denver	300
1/15/2025	CO 119 BRT Transit Advisory Committee Stakeholder Meeting #2	Virtual	8
1/15/2025	Asian Chamber of Commerce General Monthly Meeting	Denver	40
1/16/2025	Way to Go Monthly Meeting	Denver	17
1/17/2025	Martin Luther King, Jr. Business Awards	Denver	300
1/24/2025	Law Enforcement Hiring Expo	Westminster	40
1/29/2025	DRMAC Local Coordinating Council Luncheon	Denver	34
1/30/2025	WTS Annual Awards Recognition Luncheon	Denver	500
2/1/2025	Lunar New Year Celebration	Denver	68
2/3/2025	Transit Equity Day Special News Conference	Denver	35
2/5/2025	Visit Denver Transportation Forum	Virtual	15
2/5/2025	CO 119 Transportation Advisory Committee Stakeholder Meeting #3	Virtual	7
2/5/2025	HCC - Infrastructure Committee Monthly Meeting	Denver	7
2/6/2025	Jefferson County Local Coordinating Council Meeting	Virtual	5
2/8/2025	31st Annual Great Balls of Fire- 9 Ball Billiards Challenge	Denver	35
2/8/2025	2025 OCA Lunar New Year Gala	Denver	50
2/13/2025	Third Way Center Class Presentations	Denver	23

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
2/13/2025	Colorado Black Chamber of Commerce: Funding Opportunities for Minority Owned Businesses	Lakewood Colorado	35
2/13/2025	CO Early College Career Day	Aurora	30
2/14/2025	Winter Bike to Work Day at Civic Center Park	Denver	110
2/14/2025	Winter Bike to Work Day at Boulder Chamber of Commerce	Boulder	280
2/14/2025	Winter Bike to Work Day: Stanley Marketplace	Aurora	25
2/17/2025	Teaching the Autism Community Trades (TACT) 2025 Job Fair	Englewood Colorado	35
2/19/2025	Rocky Mountain Association of Financial Professionals Union Station Financing Presentation	Denver	45
2/19/2025	52nd Annual, Rocky Mountain Asphalt Conference & Equipment Show	Denver	500
2/19/2025	HCC February GMM Dinner: National Western Center Update	Denver	75
2/20/2025	February TMA Outreach Meeting	Virtual	15
2/20/2025	ThunderRidge High School College and Career Fair	Highlands Ranch	30
2/22/2025	The ARC of Aurora Self Care Health Fair	Aurora	50
2/28/2025	Adams 14 Transition Program Presentation at Lester Arnold High School	Commerce City	16



## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
2/13/2025	Colorado Black Chamber of Commerce: Funding Opportunities for Minority Owned Businesses	Lakewood Colorado	35
2/13/2025	CO Early College Career Day	Aurora	30
2/14/2025	Winter Bike to Work Day at Civic Center Park	Denver	110
2/14/2025	Winter Bike to Work Day at Boulder Chamber of Commerce	Boulder	280
2/14/2025	Winter Bike to Work Day: Stanley Marketplace	Aurora	25
2/17/2025	Teaching the Autism Community Trades (TACT) 2025 Job Fair	Englewood Colorado	35
2/19/2025	Rocky Mountain Association of Financial Professionals Union Station Financing Presentation	Denver	45
2/19/2025	52nd Annual, Rocky Mountain Asphalt Conference & Equipment Show	Denver	500
2/19/2025	HCC February GMM Dinner: National Western Center Update	Denver	75
2/20/2025	February TMA Outreach Meeting	Virtual	15
2/20/2025	ThunderRidge High School College and Career Fair	Highlands Ranch	30
2/22/2025	The ARC of Aurora Self Care Health Fair	Aurora	50
2/28/2025	Adams 14 Transition Program Presentation at Lester Arnold High School	Commerce City	16

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
3/1/2025	HCC's 2025 Annual Awards Gala	Denver	400
3/3/2025	2025 May Proposed Service Changes Public Meeting #2	Virtual	3
3/3/2025	May 2025 Proposed Service Changes Public Meeting #1	Virtual	2
3/4/2025	Leroy Elementary School - Read Across America Week	Northglenn	65
3/4/2025	Ask a Service Planner - May 2025 Proposed Service Changes	Virtual	10
3/5/2025	Burrell Arts - 8th Grade Assembly	Aurora	80
3/6/2025	Bear Creek Elementary School - Read Across America Week	Boulder	40
3/6/2025	Denver Center for Performing Arts Ride-Along	Denver	10
3/6/2025	Disability Rights Advocacy Day	Denver	N/A
3/7/2025	Neurodiversity 101	Virtual	7
3/12/2025	RTD - Fraternal Order of Police Media Event	Denver	40
3/12/2025	2025 ACC Cultural Experience Series - Korea	Lakewood	65
3/13/2025	Denver South Board Meeting	Lone Tree	35
3/13/2025	COMTO Colorado's Annual Kickoff Party	Denver	120
3/14/2025	How to Ride with Flagstaff Academy	Longmont	100
3/18/2025	Civic Center Station Transit Employee Appreciation Outreach	Denver	75
3/18/2025	I-25 and Broadway Station Transit Employee Appreciation Outreach	Denver	50
3/18/2025	Downtown-Littleton Station Transit Employee Appreciation Outreach	Littleton	18

## Public Engagement Activities

### Jan. 2022 – Mar. 2025

Date	Event Name	Location	Number Engaged
3/18/2025	Central Park Station Transit Employee Appreciation Outreach	Denver	50
3/18/2025	Federal Center Station Transit Employee Appreciation Outreach	Lakewood	33
3/18/2025	Wagon Road Park-n-Ride Transit Employee Appreciation Outreach	Thornton	17
3/18/2025	Downtown Boulder Station Transit Employee Appreciation Outreach	Boulder	100
3/18/2025	US36 and Sheridan Station Transit Employee Appreciation Outreach	Westminster	58
3/19/2025	Neurodiversity Mingle	Denver	20
3/21/2025	Denver Safe City Youth Leadership Summit	Denver	107
3/26/2025	"How to Ride Presentation" with Golden West	Boulder	18
3/26/2025	Start Your Day With RTD	Denver	21
3/26/2025	Gabbing with Gabe and Gisa: A Community Listening Event: Safety and Security	Boulder	14
3/27/2025	Out in Business Networking	Denver	30
3/27/2025	Denver Workforce (Montbello) Hiring Event	Denver	15
3/29/2025	ACCC 4th Annual Business Awards Reception & Fundraiser	Aurora	300
3/31/2025	Creative Placemaking through Transit and People-Focused Design Walking Tour	Arvada	35



**We make lives better  
through connections.**

# **RTD 2025-2028 Title VI Program**

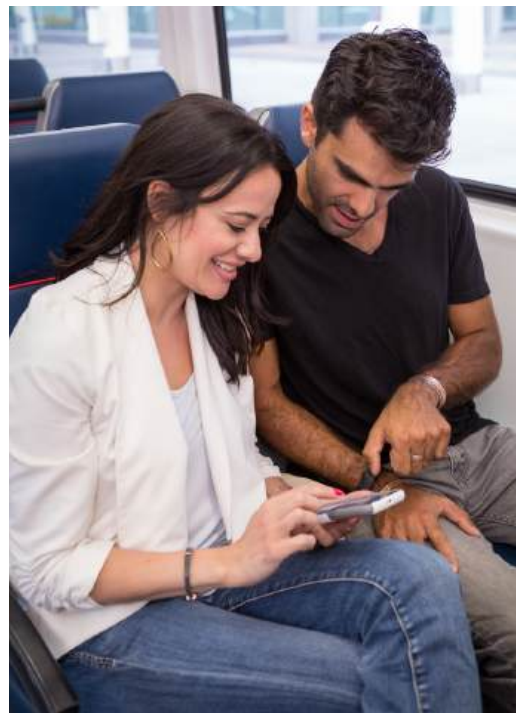
## **Attachment F: Language Access Plan**

DRAFT

# 2025-2028 RTD Language Access Plan

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



# Table of Contents

Acronyms .....	2
Definitions .....	2
Executive Summary.....	3
Introduction.....	5
<i>Legal Basis for Language Access Requirements</i> .....	5
<i>RTD's Dedication to Language Access</i> .....	5
Four Factor Analysis .....	6
<i>Background</i> .....	6
<i>Factor 1: Number or Proportion of Linguistically Diverse Persons within RTD Service Area</i> .....	7
Methodology .....	7
Key Findings .....	8
Results .....	8
American Community Survey (ACS) .....	8
Public Use Microdata Sample (PUMS) .....	15
Colorado Department of Education (CDE) .....	21
Colorado Health Authority .....	22
Discussion .....	23
<i>Factor 2: Frequency of Contact with Linguistically Diverse Persons</i> .....	24
Methodology .....	24
Key Findings .....	25
Results .....	25
Respondent Characteristics.....	25
Frequency and Location of Interactions with Linguistically Diverse Customers .....	27
Characteristics of Interactions with Linguistically Diverse Customers .....	29
Staff Recommendations to Improve Communication with Linguistically Diverse Customers .....	32
Discussion .....	36
<i>Factor 3: Nature and Importance of RTD Services to Linguistically Diverse Persons</i> .....	36
Language Access Survey .....	36
Methodology .....	36
Key Findings .....	38
Results.....	39
Discussion .....	53
Focus Group: Interpreter Network by Spring Institute .....	55
Methodology .....	55
Key Findings .....	56
Results.....	56



# RTD 2025-2028 Language Access Plan

Discussion .....	60
<i>Factor 4: Available Resources and Costs of Providing Language Assistance Services.....</i>	<i>61</i>
Methodology .....	61
Results .....	61
Resources .....	61
Costs.....	61
Discussion .....	62
Language Access Measures .....	62
<i>Language Access Progress Made from 2022 to 2025.....</i>	<i>63</i>
<i>Activities to Continue.....</i>	<i>64</i>
Translation of Vital Materials.....	64
Tier 1: Safety, Security and Civil Rights.....	65
Tier 2: Information Critical to Access RTD's Services .....	65
Tier 3: Information to Empower Customers.....	65
Tier 4: Entertainment.....	65
<i>New Language Access Activities: Implementation Calendar .....</i>	<i>66</i>
Key Outcomes .....	67
Outcome 1: Update and Monitor the LAP .....	67
Outcome 2: Strengthen and Standardize Language Access Processes .....	67
Outcome 3: Expand and Promote Language Assistance Services.....	67
Outcome 4: Enhance Employee Training and Resources to Serve Linguistically Diverse Customers .....	67
Conclusion .....	69
Appendix .....	70
<i>Appendix A: Additional ACS and PUMS Maps.....</i>	<i>70</i>
ACS Maps .....	70
PUMS Maps .....	79
<i>Appendix B: Factor 2 Survey Instrument (Paper Copy).....</i>	<i>97</i>
<i>Appendix C: Employee Interaction Locations.....</i>	<i>102</i>
<i>Appendix D: Language Access Survey (English Copy) .....</i>	<i>103</i>
<i>Appendix E: Examples of Translated Materials.....</i>	<i>108</i>
<i>Appendix F: Website and Next Ride Translated Sessions (2024) .....</i>	<i>115</i>
<i>Appendix G: Copy of Serving Non-English-Speaking Customers Training Slide Deck.....</i>	<i>118</i>

# RTD 2025-2028 Language Access Plan

## Acronyms

<b>ACS</b>	American Community Survey
<b>CDE</b>	Colorado Department of Education
<b>DOT</b>	Department of Transportation
<b>LAP</b>	Language Access Plan
<b>LEP</b>	Limited English Proficiency or Limited English Proficient
<b>PUMS</b>	Public Use Microdata Sample
<b>RTD</b>	Regional Transportation District
<b>FTA</b>	Federal Transit Administration
<b>USDOT</b>	United States Department of Transportation
<b>WIC</b>	Special Supplemental Nutrition Program for Women, Infants, and Children

## 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. In demographic data, the U.S. Census Bureau defines an LEP person as an individual who is age five or older and speaks English less than "very well." RTD refers to persons with limited English proficiency as **linguistically diverse** persons where possible.

**Meaningful Access** – Language assistance that results in accurate, timely and effective communication at no cost to linguistically diverse people. Meaningful access denotes access that is not unreasonably restricted, delayed, or inferior as compared to access to programs or activities provided to persons proficient in English.

**Reasonable Steps** – Steps taken, or language assistance services provided, to ensure effective communication with linguistically diverse people (e.g., interpretation services).

**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.

**Safe Harbor (Language)** – The safe harbor provision, as interpreted by the U.S. Department of Justice, explains when agencies are considered compliant with rules for translating written materials for diverse language groups. It states that agencies meet the requirements if vital documents are translated for each eligible language group, as determined by the Four Factor Analysis. To qualify, the language group must make up at least 5% or 1,000 people (whichever is smaller) of the population being served.

**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 linguistically diverse person if the information in question is not provided accurately or in a timely manner.

# RTD 2025-2028 Language Access Plan

## Executive Summary

RTD is committed to ensuring equitable access to its services for all individuals regardless of their background or ability — including English proficiency. This Language Access Plan (LAP) provides a framework for meeting the needs of limited English proficient persons (hereafter referred to as “linguistically diverse” persons) in the agency’s service area, ensuring compliance with Title VI of the Civil Rights Act of 1964 and aligning with its mission to provide inclusive, accessible, and equitable transit services. By proactively addressing language barriers, RTD enhances mobility and improves the customer experience for its diverse ridership. This commitment supports RTD’s strategic priorities — Community Value and Customer Excellence — as well as its strategic initiatives: a Welcoming Transit Environment and Customer and Community Connections.

RTD’s LAP is structured off of the Federal Transit Administration’s (FTA) requirements in Circular 4702.1B, “Title VI Requirements and Guidelines for FTA Recipients.” It begins with a **Four Factor Analysis**, which assesses the language assistance needs of local communities and provides the data RTD needs to make informed decisions on providing language assistance. Data includes the number of linguistically diverse people in the agency’s service areas as well as the most common languages they speak, the frequency with which linguistically diverse persons interact with RTD frontline staff, the suggestions staff have to overcome language barriers with customers, the nature and importance of RTD’s services to the linguistically diverse population, and, finally, the costs to pursue various language assistance measures.

In **Factor 1**, using the U.S. Census Bureau’s American Community Survey, Public Use Microdata Sample (PUMS), Colorado Department of Education, and Colorado Health Authority data, the Transit Equity Office (TEO) found that approximately 200,812 individuals speak English “less than very well,” representing 6.88% of the population. Spanish speakers account for 65.4% of the linguistically diverse population (per the ACS) followed by Vietnamese and Chinese (4.73% and 3.97% of the linguistically diverse population, respectively). Overall, the Factor 1 analysis identified 19 safe harbor languages,<sup>1</sup> which include (in alphabetical order) Amharic, Arabic, Burmese, Chinese (including Mandarin and Cantonese), French, German, Hindi, Japanese, Karen, Korean, Nepali, Persian (including Dari and Farsi), Russian, Somali, Tagalog, Tigrinya, Spanish, Swahili, and Vietnamese.

In **Factor 2**, TEO conducted a survey with frontline employees who interact with customers. The survey received 662 responses. It found that RTD’s customer-facing staff are experiencing a notable increase in interactions with linguistically diverse customers, with daily interactions rising from 26% in 2021 to 40% in the most recent survey. Most of these interactions (86%) occur in person on buses, trains, or at stations, with a smaller portion happening over the phone (16%) or online (4%). It also found that staff employ a variety of techniques to bridge language barriers, commonly using translation apps (47%), body language or communicating in simplified English (44%), and customer interpretation (30%). However, challenges persist — 70% of staff find it difficult to communicate with customers who speak little or no English, a significant increase from 57% in 2021. Additionally, only 46% feel equipped to handle these interactions, while 54% report feeling somewhat or completely unprepared. To improve language accessibility, staff offered a variety of recommendations, including that RTD provide translation devices, offer language training (especially in Spanish), expand translated materials and signage, implement direct access to telephonic interpretation services, and hire more multilingual employees to better serve the agency’s diverse ridership.

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<sup>1</sup> The safe harbor provision, as interpreted by the U.S. Department of Justice, explains when agencies are considered compliant with rules for translating written materials for diverse language groups. It states that agencies meet the requirements if vital documents are translated for each eligible language group, as determined by the Four Factor Analysis. To qualify, the language group must make up at least 5% or 1,000 people (whichever is smaller) of the population being served.

# RTD 2025-2028 Language Access Plan

In **Factor 3**, TEO conducted a survey with linguistically diverse people, receiving 578 responses. Findings indicate that respondents face significant language barriers. The majority (73%) spoke Spanish, followed by Chinese (18%), with 23 languages represented overall. Most respondents indicated high usage of RTD services, with 70% frequently using RTD buses, while train usage was lower (41%), and demand-response services were rarely used. Importantly, the survey respondents were largely transit reliant, where 61% of respondents reported not having access to a household vehicle. While 51% say they use RTD as much as needed, nearly a third (29%) report that language barriers prevent them from using transit more often, and many struggle to navigate key RTD services. For example, over 70% do not know how to apply for discounts, report a safety concern, or make a customer service complaint. Survey participants provided detailed suggestions on how RTD can enhance language accessibility, including hiring more bilingual bus operators and frontline employees, providing staff with real-time translation tools, improving translation and signage, introducing Spanish audio announcements, enhancing the accessibility of digital tools (e.g., the RTD website and Next Ride app), and partnering with community-based organizations to better engage linguistically diverse customers. Beyond language access, respondents highlighted three key concerns: affordability, security, and cleanliness.

For Factor 3, TEO also hosted a focus group with the Interpreter Network from the Spring Institute for Intercultural Learning in September 2022. The focus group corroborated the findings of the aforementioned survey, especially reinforcing the need for improved digital communications, in-system language assistance resources (e.g., improved wayfinding, audio announcements, signage), and community partnerships.

In **Factor 4**, TEO reported agency expenditures on language assistance activities from June 1, 2022 to March 31, 2025 across the Paratransit Services Division; the Communications and Engagement, Transit Police, and Human Resources departments; the Board Office; the Risk Management Division; and the Civil Rights Division. During this period, RTD and its contractors spent an estimated \$309,882 on language assistance services — a 78% increase from the \$176,318 reported for the June 2019-May 2022 time period. The largest expense was the cost of contracts with TEO's multicultural outreach partners, estimated at \$101,442.

Based on the data gathered in the Four Factor Analysis, the final portion of the plan is the **Language Access Measures section**, which outlines specific activities and commitments — both new and ongoing — that RTD will pursue to improve language assistance in the coming years. Activities that the agency will carry over from prior years include, but are not limited to, providing telephonic interpretation (as well as bilingual English-Spanish information specialists) via Customer Care, providing the RTD website and Next Ride app in RTD's top five safe harbor languages, developing resources for frontline staff that they have identified may be useful in bridging language barriers with customers, and delivering the Serving Non-English-Speaking Customers training to frontline staff. New activities identified for the 2025 to 2028 period include exploring providing translation devices in RTD fixed-route buses, making email and text service alerts available in Spanish, ensuring language assistance measures are integrated into RTD's upcoming all-in-one mobile ticketing app, piloting Spanish audio announcements in fixed-route buses, and establishing a translation review process for the translation tool on the RTD website (among the 23 total new tasks).

In conclusion, the 2025-2028 LAP builds upon the framework and tasks of RTD's 2022-2025 LAP, incorporates updated data on Denver's language needs, and sets forth specific, measurable, and data-driven actions to enhance the accessibility of RTD's transit services and programs.

# RTD 2025-2028 Language Access Plan

## Introduction

As the Denver metropolitan region's public transportation provider, the Regional Transportation District (RTD) is committed to serving residents, customers, and visitors regardless of race, color, or national origin. This includes making reasonable accommodations and removing barriers for individuals in protected classes, including linguistically diverse individuals. These individuals, language can hinder access to RTD's services and programs, compliance with responsibilities like payment or safety measures, or awareness of their civil rights while riding. Providing language assistance is not only a federal requirement but also a reflection of RTD's mission, vision, and values to ensure accessible public transportation for all.

## Legal Basis for Language Access Requirements

The Civil Rights Act of 1964 and U.S. Department of Transportation (USDOT) guidance require federally funded agencies, including RTD, to take reasonable steps to ensure linguistically diverse individuals have meaningful access to their programs and services.

At the core of these requirements is Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.), which 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." While Title VI does not explicitly list language as a protected category, the 1974 Supreme Court case *Lau v. Nichols* (414 U.S. 563) interpreted Title VI regulations to prohibit actions that disproportionately impact linguistically diverse individuals, as such effects constitute national origin discrimination.

To ensure compliance, USDOT issued its "Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons" (USDOT LEP Guidance) on December 14, 2005. Further guidance came from the FTA, which published 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, to:

1. Conduct a Four Factor Analysis;
2. Develop a Language Access Plan (LAP); and
3. Provide appropriate language assistance.

By meeting these requirements, RTD and other transit agencies work to reduce language barriers and ensure equitable access to their programs and services.

## RTD's Dedication to Language Access

Language access is not just about meeting federal compliance requirements; however, it is fundamental to RTD's mission of making lives better through connections and ensuring equitable mobility for all. Providing meaningful access to linguistically diverse communities aligns directly with RTD's strategic priorities of Community Value and Customer Excellence. By removing language barriers, RTD strengthens its role as a trusted community partner, enhances the customer experience, and ensures that all customers — regardless of their preferred language — can navigate the transit system with confidence. Language access also supports RTD's Welcoming Transit Environment strategic initiative by fostering a more inclusive and secure transit experience, where all customers feel respected and informed. Additionally, it reinforces Customer and Community Connections by deepening engagement with the diverse populations RTD serves. Ultimately, language access is not just an obligation — it is a commitment to equity, dignity, and accessibility, ensuring that no one's mobility options are limited by language. Through this work, RTD continues to create a transit system that is truly welcoming and inclusive for everyone.

# RTD 2025-2028 Language Access Plan

Figure 1. RTD's Strategic Priorities and Strategic Initiatives Related to Language Access



## Four Factor Analysis

### Background

A key component of the USDOT's and FTA's framework for creating a Language Access Plan, RTD's Four Factor Analysis helps the agency assess the language needs of local communities and determine appropriate language assistance measures. The Analysis evaluates the following four factors:

1. **Factor 1:** The number or proportion of linguistically diverse persons eligible to be served or likely to be encountered by an RTD program, activity, or service. This involves analyzing demographic data, such as U.S. Census Bureau data, to identify significant populations who speak little or no English
2. **Factor 2:** The frequency with which linguistically diverse persons interact with RTD programs, activities, or services. Higher frequency of contact increases the need for language assistance services to accommodate linguistically diverse persons effectively



# RTD 2025-2028 Language Access Plan

3. **Factor 3:** The nature and importance of programs, activities or services provided by RTD to the linguistically diverse population. Services critical to basic well-being, such as transportation, typically warrant greater attention to language accessibility
4. **Factor 4:** The resources available to RTD and overall cost to provide language assistance. This factor balances the need for language services with the organization's ability to allocate funding and resources effectively

RTD's Transit Equity Office within the Civil Rights Division updated the agency's Four Factor Analysis in the fall and winter of 2024 through 2025 to inform this updated Language Access Plan. The following sections outline the approach to and results of each of the Four Factor analyses.

## Factor 1: Number or Proportion of Linguistically Diverse Persons within RTD Service Area

### Methodology

To complete Factor 1, RTD must assess the number or proportion of linguistically diverse individuals<sup>2</sup> who are eligible for RTD services or may interact with the agency. The U.S. Census Bureau's American Community Survey (ACS) serves as a key source for identifying safe harbor languages in RTD's service area.<sup>3</sup> To supplement these estimates, the Public Use Microdata Sample (PUMS) data is analyzed to identify additional language groups as it allows for a more detailed examination of language subcategories, especially African languages (e.g., Amharic and Somali) and Asian languages (e.g., Cambodian and Laotian).

RTD's Transit Equity Office collaborated with Nelson\Nygaard Consulting Associates to compile and analyze this data. The ACS data, released on December 12, 2024, was sourced from the 2018–2023 ACS 5-Year Estimates Table C16001, while the PUMS data was obtained from Table B1600, following its release on January 23, 2025. Both datasets were used to determine the proportion and languages spoken of LEP individuals within census tracts and Public Use Microdata Areas (PUMAs) across RTD's service area.

In addition to data from the ACS and PUMS, the Factor 1 analysis incorporates the most recent Student Language of Origin data from the Colorado Department of Education (CDE) for the 2024 school year. This dataset provides information on languages spoken at home and enrollment in English as a Second Language (ESL) services for students from kindergarten through high school. It is assumed that if a child speaks a language other than English, their parents or guardians likely speak the same language at home, particularly if the student receives ESL services. While this dataset does not capture non-school-aged populations, it serves as a valuable complement to Census data. School districts included in the analysis were those with at least one school located within a zip code covered by RTD's service area.

Finally, TEO sourced additional supplementary data from the Colorado Health Authority on languages spoken at participating Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) clinics. The dataset covered January 2023 to December 2024 and includes information from clinics across Jefferson, Boulder,

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<sup>2</sup> RTD recognizes the importance of balancing technical accuracy with inclusive language throughout Factor 1. In this analysis, the term "LEP" refers to individuals who speak another language at home and speak English less than "very well." This standardized definition, used by the U.S. Census Bureau, serves as the foundation for the data in this report. To align with federal guidelines and ensure clarity, RTD will retain the term "LEP" in data-driven sections. However, RTD is committed to using more inclusive language that reflects the diversity of the communities it serves. Therefore, while maps, tables, and some written portions in Factor 1 will use the term "LEP" for accuracy, this report aims to use "linguistically diverse" in all other contextual narratives to describe these communities.

<sup>3</sup> RTD estimated service area boundaries used the ACS 5-Year Estimates at the census tract level. RTD analyzed all census tracts required to include all 8 counties where RTD has services: Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson, and Weld counties.



# RTD 2025-2028 Language Access Plan

and Denver counties as well as most of the City and County of Broomfield and portions of Adams, Douglas, Weld, and Arapahoe counties. TEO obtained this data through the [Colorado WIC Data Dashboard](#) by selecting the last two full calendar years and isolating the relevant counties. The dataset provides additional insights into linguistic diversity within RTD's service area.

This comprehensive approach ensures that multiple data sources are leveraged to provide an accurate assessment of language needs within RTD's service area.

## Key Findings

The RTD service area, home to approximately 2.92 million people, includes 200,812 individuals who speak English "less than very well," representing 6.88% of the population. Spanish remains the most widely spoken language at home after English, accounting for 65.4% of the linguistically diverse population (per the ACS). Vietnamese and Chinese are the second- and third-most spoken languages, making up 4.73% and 3.97% of the linguistically diverse population, respectively. By combining ACS, PUMS, CDE, and WIC data and confirming them with the Transit Equity Office's qualitative experiences engaging with the community, the Factor 1 analysis identifies 19 safe harbor languages, which include (in alphabetical order) Amharic, Arabic, Burmese, Chinese (including Mandarin and Cantonese), French, German, Hindi, Japanese, Karen, Korean, Nepali, Persian (including Dari and Farsi), Russian, Somali, Tagalog, Tigrinya, Spanish, Swahili, and Vietnamese.

The general distribution of LEP individuals around the RTD service area remain similar to the 2022-2025 Factor 1, with the highest concentrations of LEP populations in north and northeast Denver, east Lakewood/west Denver, and throughout Aurora. However, south Boulder saw a significant increase in all LEP populations since the last Factor 1 analysis, and Aurora continues to grow its LEP population as well.

Taken together, these findings provide a comprehensive understanding of the linguistic diversity and dispersion within RTD's service area, informing targeted language access initiatives. By continuously assessing demographic trends, RTD can implement targeted engagement strategies to ensure the language accessibility of its services and programs.

## Results

### *American Community Survey (ACS)<sup>4</sup>*

According to the ACS, approximately 2.92 million people<sup>5</sup> live in the RTD service area, including an estimated 200,812 individuals who speak English "less than very well" (representing 6.88% of the population). This percentage is roughly consistent with the 2022-2025 Factor 1 analysis.<sup>6</sup>

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<sup>4</sup> U.S. Census American Community Survey Tables: 2018-2023 (5-Year Estimates), Table C16001: Language Spoken at Home for the Population 5 Years or Older (Census Tracts)

<sup>5</sup> The total population whose language ability is determinable — here, 2.92 million people — is lower than the estimate of total population that may be noted in other RTD documentation. This is due to the inability of the Census to identify the spoken languages or English proficiency for everyone estimated to reside in a particular census tract. Linguistically diverse people may also belong to one or several ["hard-to-count" populations](#), leaving them undercounted.

<sup>6</sup> Please note that comparison between actual population numbers should not be drawn between this Factor 1 analysis and the previous analysis from the 2022-2025 Language Access Plan. Previously, the population sample included the total populations of all eight counties where RTD has service (i.e., Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson, and Weld Counties) whereas this analysis used the address method of population distribution to estimate LEP data for the population within RTD's service area — thus making it a smaller sample size.

# RTD 2025-2028 Language Access Plan

The figures below show the linguistically diverse populations by language that meet the LEP safe harbor language threshold, defined as 5% of the service area population or 1,000 individuals likely to be served by RTD, whichever is lower. Spanish remains the most widely spoken language at home after English, accounting for 65.4% of the linguistically diverse population. Vietnamese and Chinese remain the second- and third-most spoken languages, making up 4.73% and 3.97% of the linguistically diverse population, respectively. These rankings exclude broader language categories such as “other and unspecified languages,” “other Indo-European languages,” and “other Asian/Pacific Island languages.”

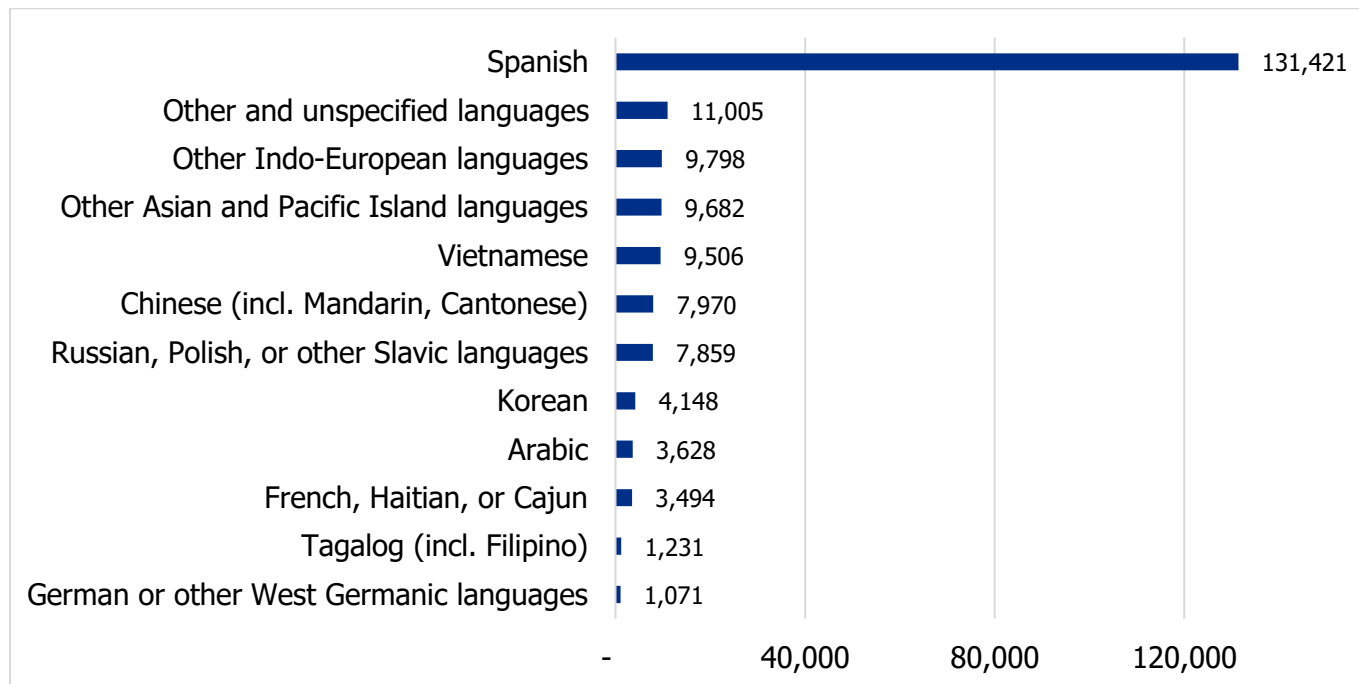
In all, ACS data allows us to identify nine initial languages that meet the safe harbor threshold: Arabic, Chinese, French, German, Korean, Russian, Spanish, Tagalog, and Vietnamese.

*Figure 1.1. Languages Spoken at Home for LEP Persons Five Years or Older in RTD Service Area (ACS)*

Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	131,421	4.50%	66.60%
Other and unspecified languages	11,005	0.38%	5.58%
Other Indo-European languages	9,798	0.34%	4.97%
Other Asian and Pacific Island languages	9,682	0.33%	4.91%
Vietnamese	9,506	0.33%	4.82%
Chinese (incl. Mandarin, Cantonese)	7,970	0.27%	4.04%
Russian, Polish, or other Slavic languages	7,859	0.27%	3.98%
Korean	4,148	0.14%	2.10%
Arabic	3,628	0.12%	1.84%
French, Haitian, or Cajun	3,494	0.12%	1.77%
Tagalog (incl. Filipino)	1,231	0.04%	0.62%
German or other West Germanic languages	1,071	0.04%	0.54%

*Figure 1.2. Languages with 1,000 or More LEP Persons Five Years or Older (ACS)*

# RTD 2025-2028 Language Access Plan



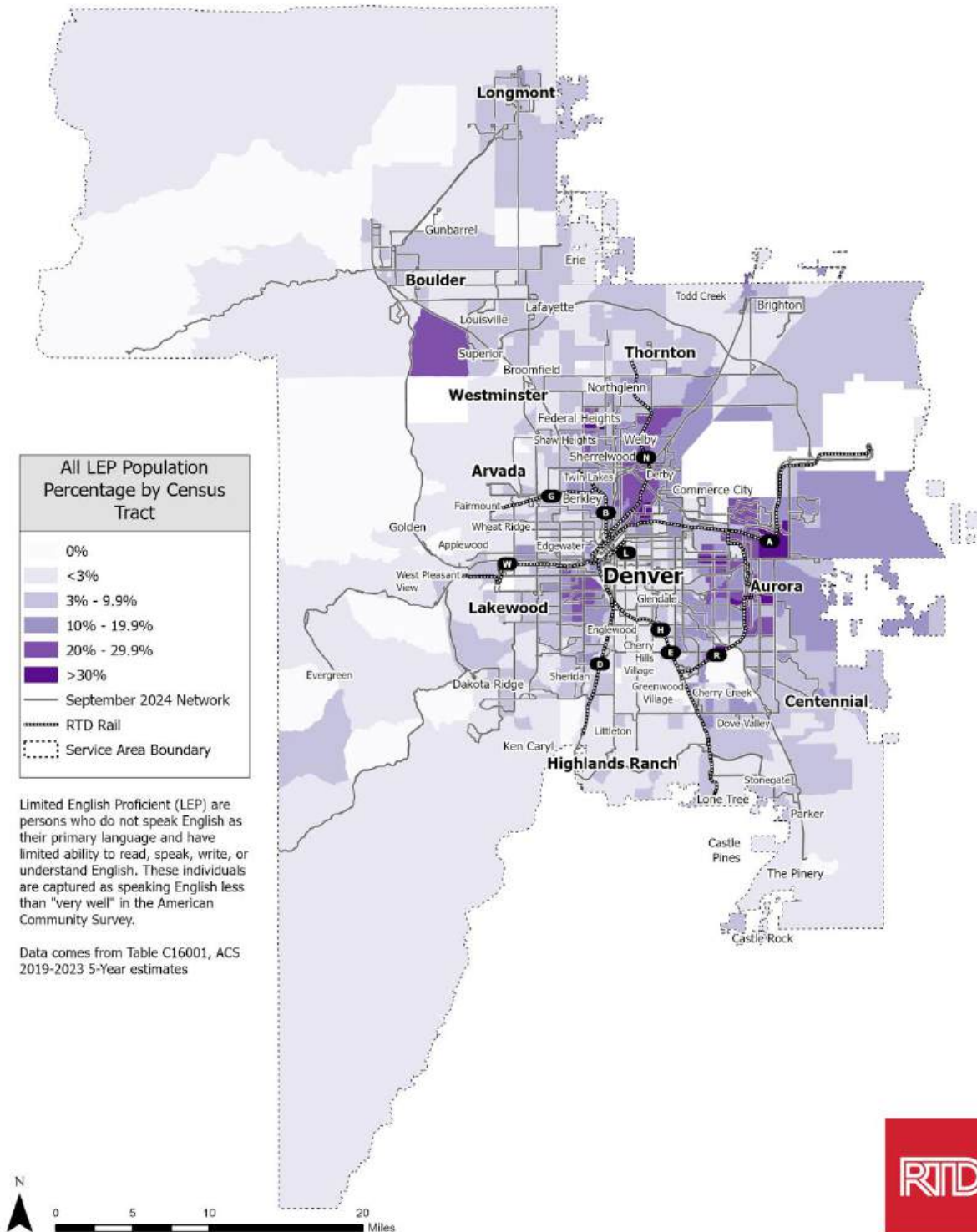
The following maps illustrate the distribution of linguistically diverse individuals throughout RTD's service area based on the most recent American Community Survey data. The first map displays the overall population of linguistically diverse individuals, while subsequent maps highlight the three most common languages spoken: Spanish, Vietnamese, and Chinese.<sup>7</sup> As a whole, the general distribution of LEP individuals around the RTD service area remain similar to the 2022-2025 Factor 1, with the highest concentrations of LEP individuals in north and northeast Denver, east Lakewood/west Denver, and throughout Aurora. However, south Boulder saw a significant increase in all LEP populations since the last Factor 1 analysis, and Aurora continues to grow its LEP population as well. Spanish speakers remain predominantly concentrated around the City and County of Denver urban core, with the greatest populations in east Denver (e.g., Montbello, Green Valley Ranch), north Aurora, east Lakewood/west Denver, and north of Denver headed to Thornton (e.g., Federal Heights, Welby, Derby, Elyria-Swansea). Similarly, the Vietnamese-speaking population has increased in Northglenn and Erie as well as select census tracts between Aurora and Centennial; generally, it appears that Vietnamese speakers have become more concentrated in specific areas like East Lakewood compared to a more general dispersion in the last Factor 1 analysis. Meanwhile, Chinese-speaking populations tend to be more prevalent in south Denver suburban areas such as Cherry Creek, Dove Valley, Dakota Ridge, and Highlands Ranch, with an increased concentration of this population in select census tracts in this area. Boulder remains an important concentration in addition to an increased concentration of LEP Chinese speakers in Louisville/Superior.

<sup>7</sup> Please refer to Appendix A for population distributions of other languages according to the ACS (and PUMS).

# RTD 2025-2028 Language Access Plan

Figure 1.3. Distribution of the Entire Limited English Proficient Population Five Years or Older (ACS)

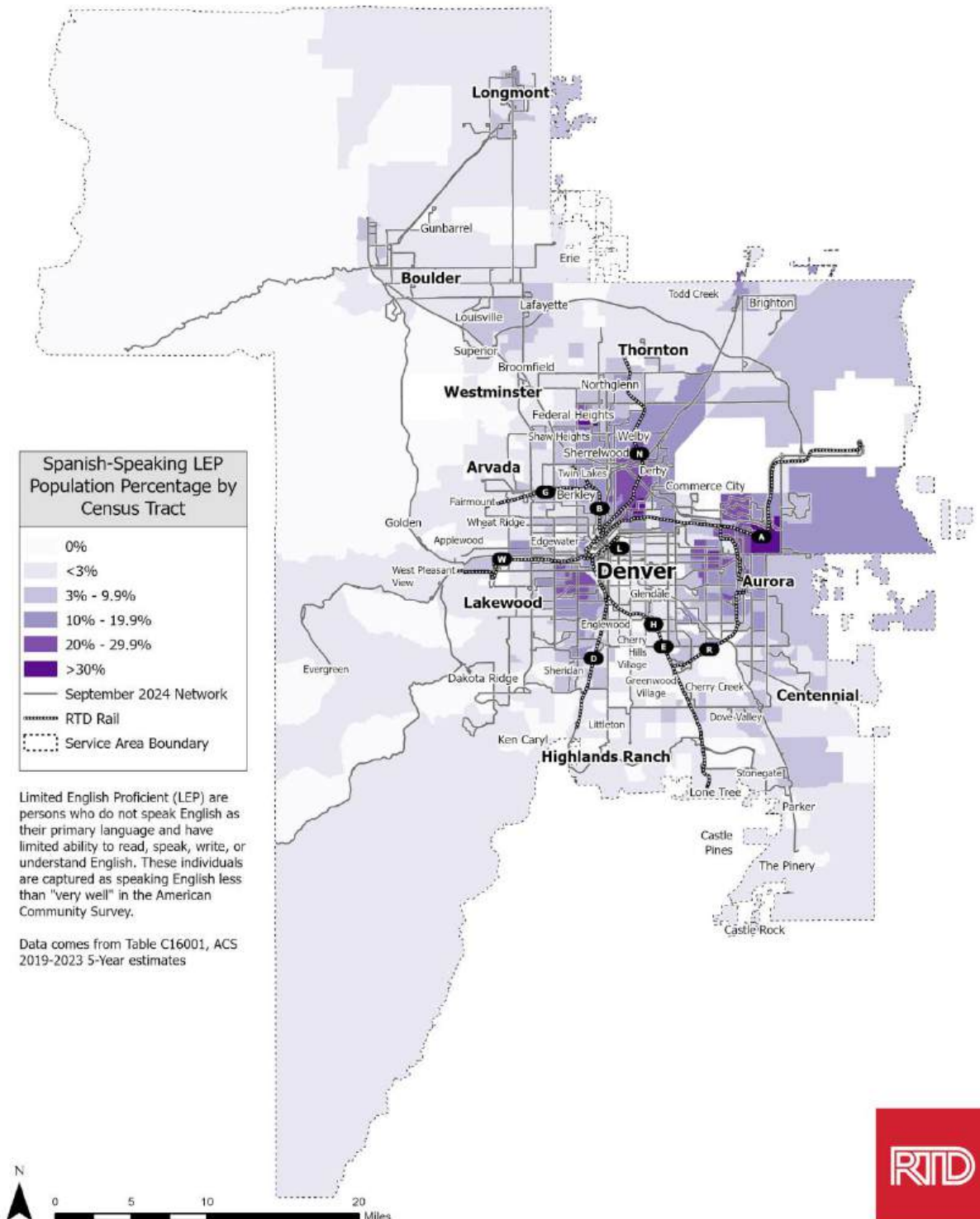
## All Limited English Proficient Population Distribution



# RTD 2025-2028 Language Access Plan

Figure 1.4. Distribution of Limited English Proficient Spanish Speakers Five Years or Older (ACS)

## Limited English Proficient Spanish-Speaking Population Distribution

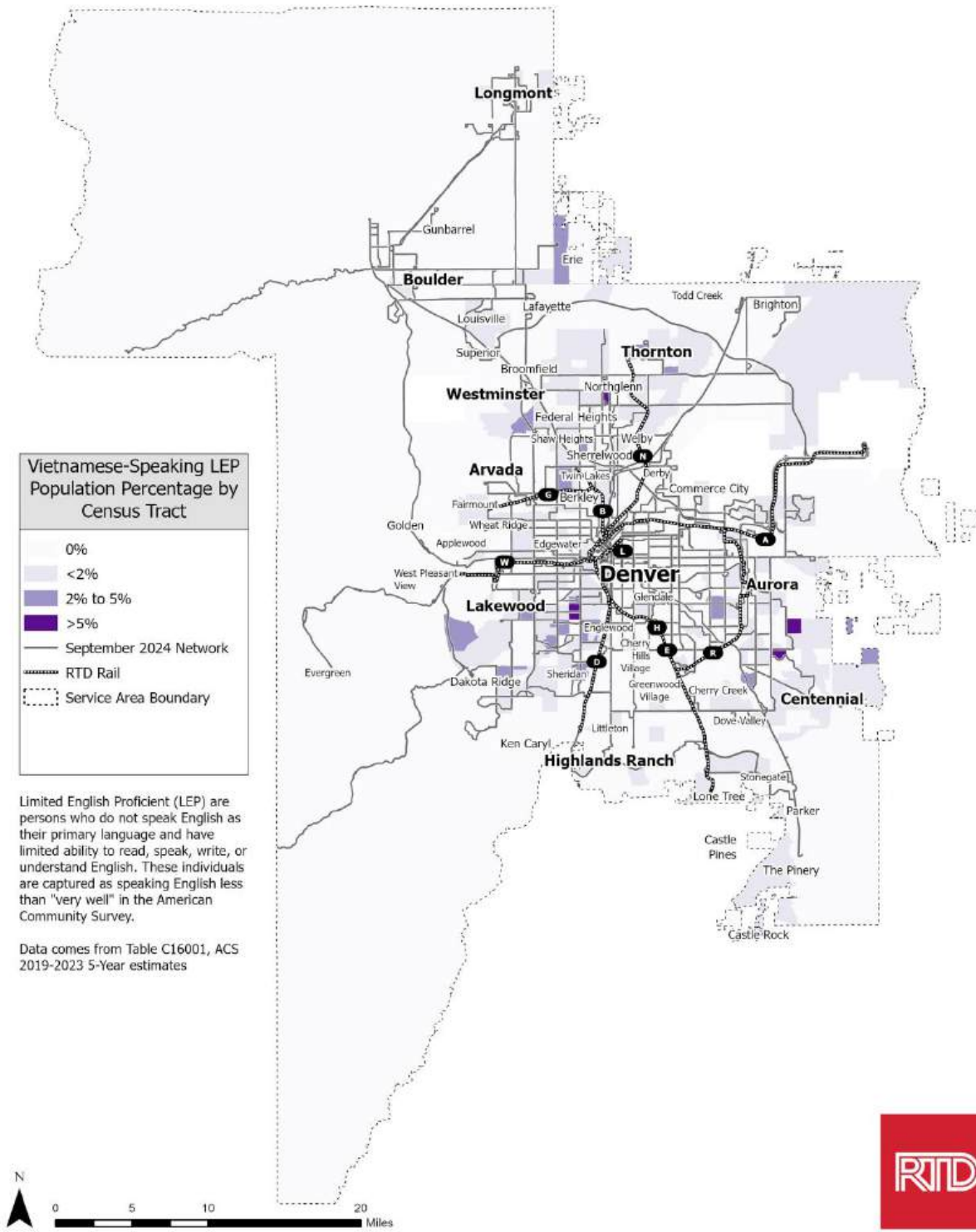




# RTD 2025-2028 Language Access Plan

Figure 1.5. ACS Distribution of Limited English Proficient Vietnamese Speakers Five Years or Older (ACS)

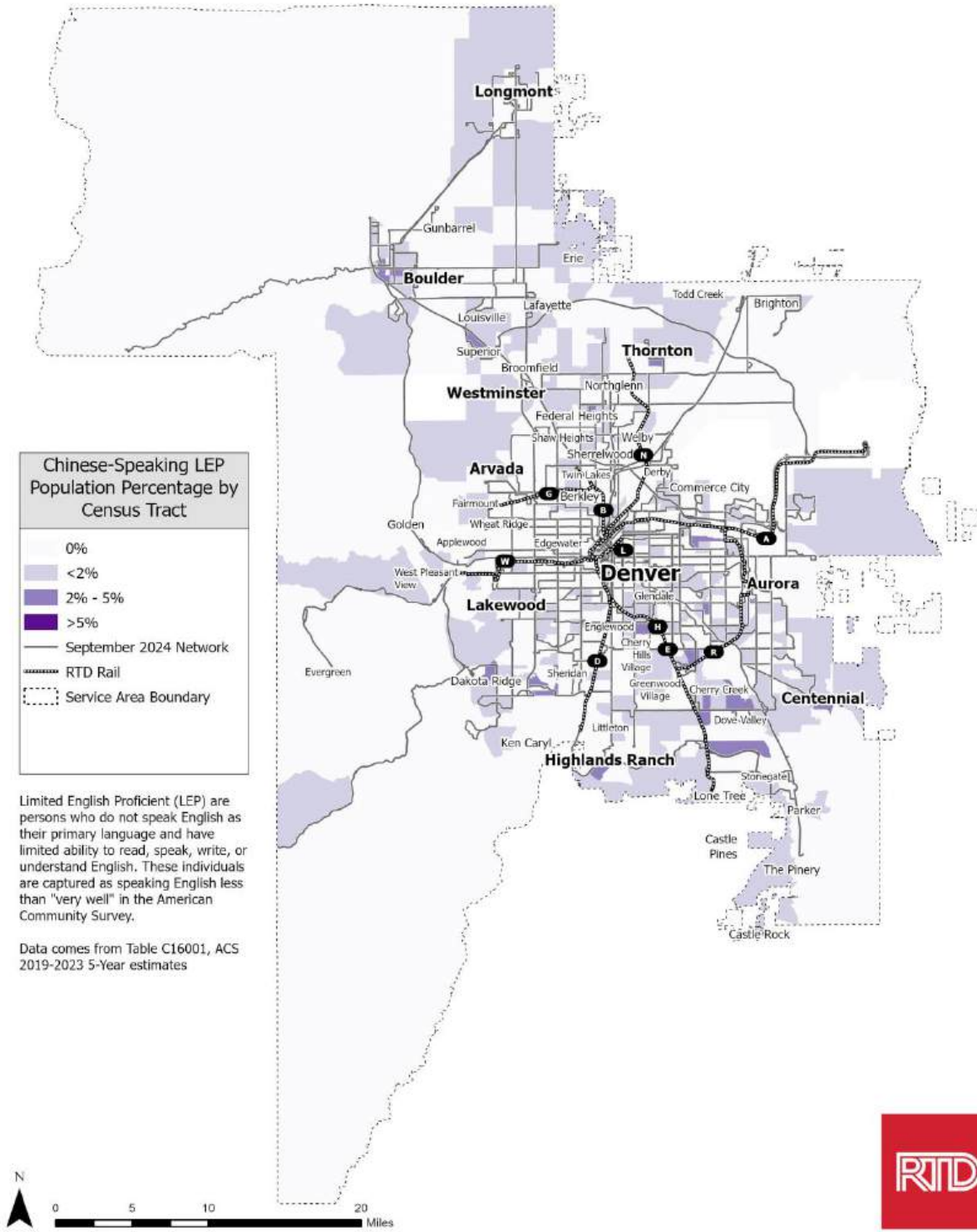
## Limited English Proficient Vietnamese-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

Figure 1.6. Distribution of Limited English Proficient Chinese Speakers Five Years or Older (ACS)

## Limited English Proficient Chinese-Speaking Population Distribution





# RTD 2025-2028 Language Access Plan

## Public Use Microdata Sample (PUMS)<sup>8</sup>

To identify additional language groups prevalent in the RTD service area beyond those captured by the ACS, RTD's Transit Equity Office examined Public Use Microdata Sample (PUMS) data. PUMS supplements ACS estimates by providing more granular insights into grouped or general language categories. As a result, in addition to Arabic, Chinese, French, German, Korean, Russian, Spanish, Tagalog, and Vietnamese being recognized as safe harbor languages per ACS data, PUMS data identifies Persian (including Dari and Farsi), Japanese, and Hindi as safe harbor languages while highlighting additional languages that may warrant consideration, such as Amharic, Nepali, Hindi, and Ukrainian (among others), as shown in Figure 1.7.

Figure 1.7. Languages Spoken at Home for Persons Five Years or Older in RTD Service Area (PUMS)

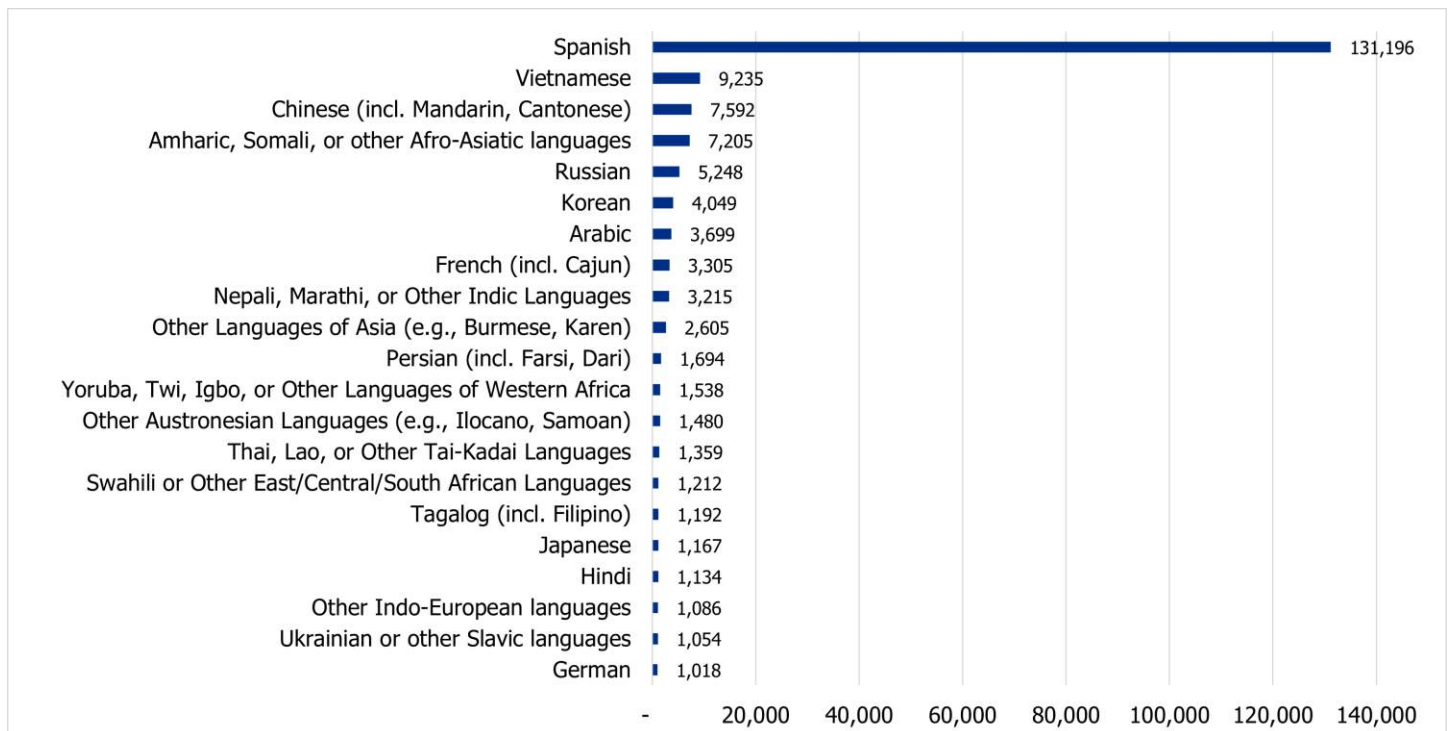
Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	131,196	4.53%	65.91%
Vietnamese	9,235	0.32%	4.64%
Chinese (incl. Mandarin, Cantonese)	7,592	0.26%	3.81%
Amharic, Somali, or other Afro-Asiatic languages	7,205	0.25%	3.62%
Russian	5,248	0.18%	2.64%
Korean	4,049	0.14%	2.03%
Arabic	3,699	0.13%	1.86%
French (incl. Cajun)	3,305	0.11%	1.66%
Nepali, Marathi, or other Indic languages	3,215	0.11%	1.62%
Other Languages of Asia (incl. Burmese, Karen, Turkish, Uzbek)	2,605	0.09%	1.31%
Persian (incl. Farsi, Dari)	1,694	0.06%	0.85%
Yoruba, Twi, Igbo, or other languages of Western Africa	1,538	0.05%	0.77%
Ilocano, Samoan, Hawaiian, or Other Austronesian Languages	1,480	0.05%	0.74%
Thai, Lao, or other Tai-Kadai languages	1,359	0.05%	0.68%
Swahili or other languages of Central, Eastern, and Southern Africa	1,212	0.04%	0.61%
Tagalog (incl. Filipino)	1,192	0.04%	0.60%

<sup>8</sup> U.S. Census Public Use Microdata Sample (PUMS) Tables: 2018-2023 (5-Year Estimates), Table B16001 (PUMS) – Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

# RTD 2025-2028 Language Access Plan

Japanese	1,167	0.04%	0.59%
Hindi	1,134	0.04%	0.57%
Other Indo-European languages (incl. Albanian, Lithuanian, Pashto [Pushto], Romanian, Swedish)	1,086	0.04%	0.55%
Ukrainian or other Slavic languages	1,054	0.04%	0.53%
German	1,018	0.04%	0.51%

Figure 1.8. Languages with 1,000 or More LEP Persons Five Years or Older (PUMS)

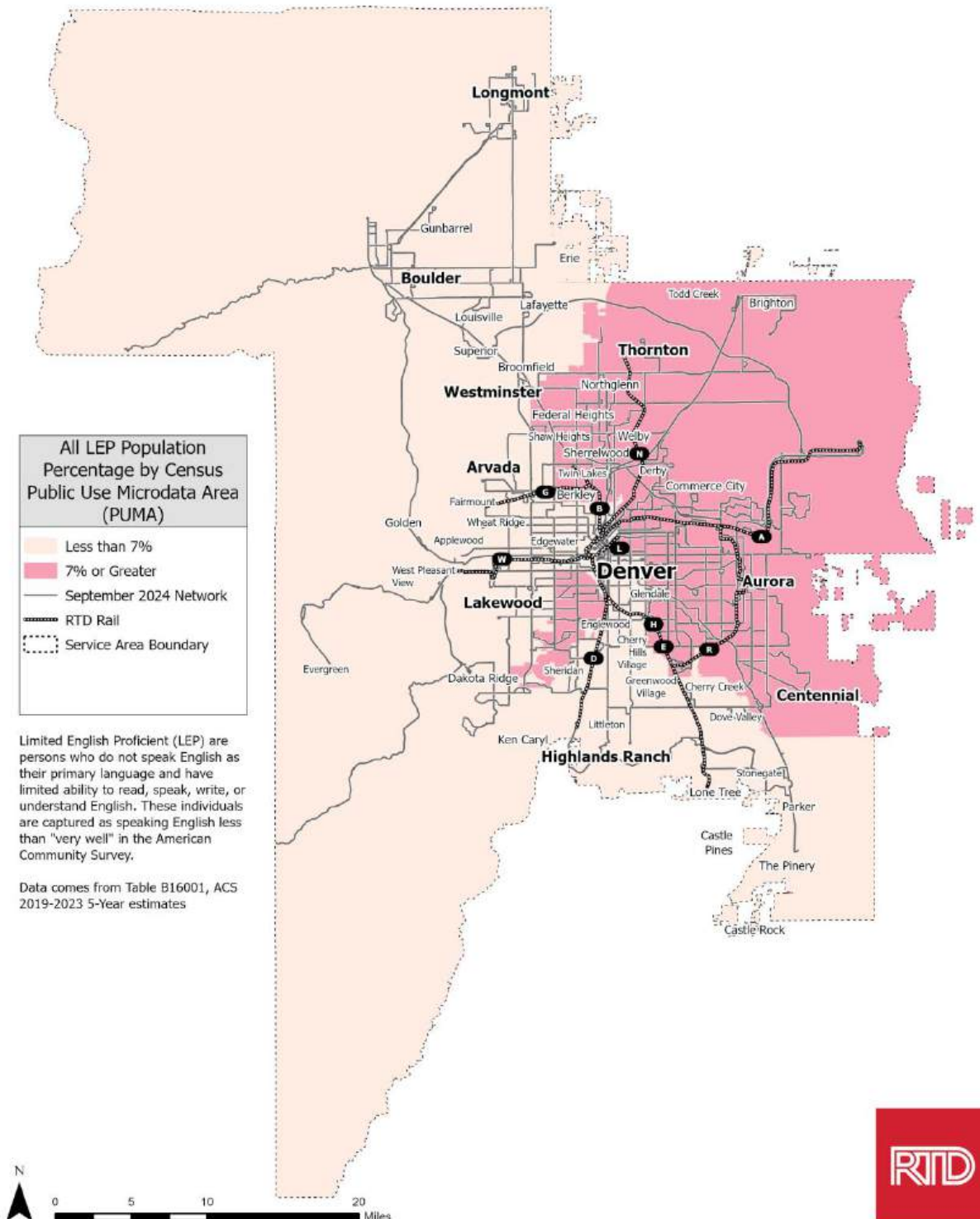


The following PUMS maps illustrate the distribution of linguistically diverse Spanish, Vietnamese, and Chinese-speaking populations within the RTD service area. These maps highlight PUMAs where the percentage of speakers in each language group is above or below their respective share of the total population. The remaining maps are available in Appendix A.

# RTD 2025-2028 Language Access Plan

Figure 1.9. Distribution of the Entire Limited English Proficient Population Five Years or Older (PUMS)

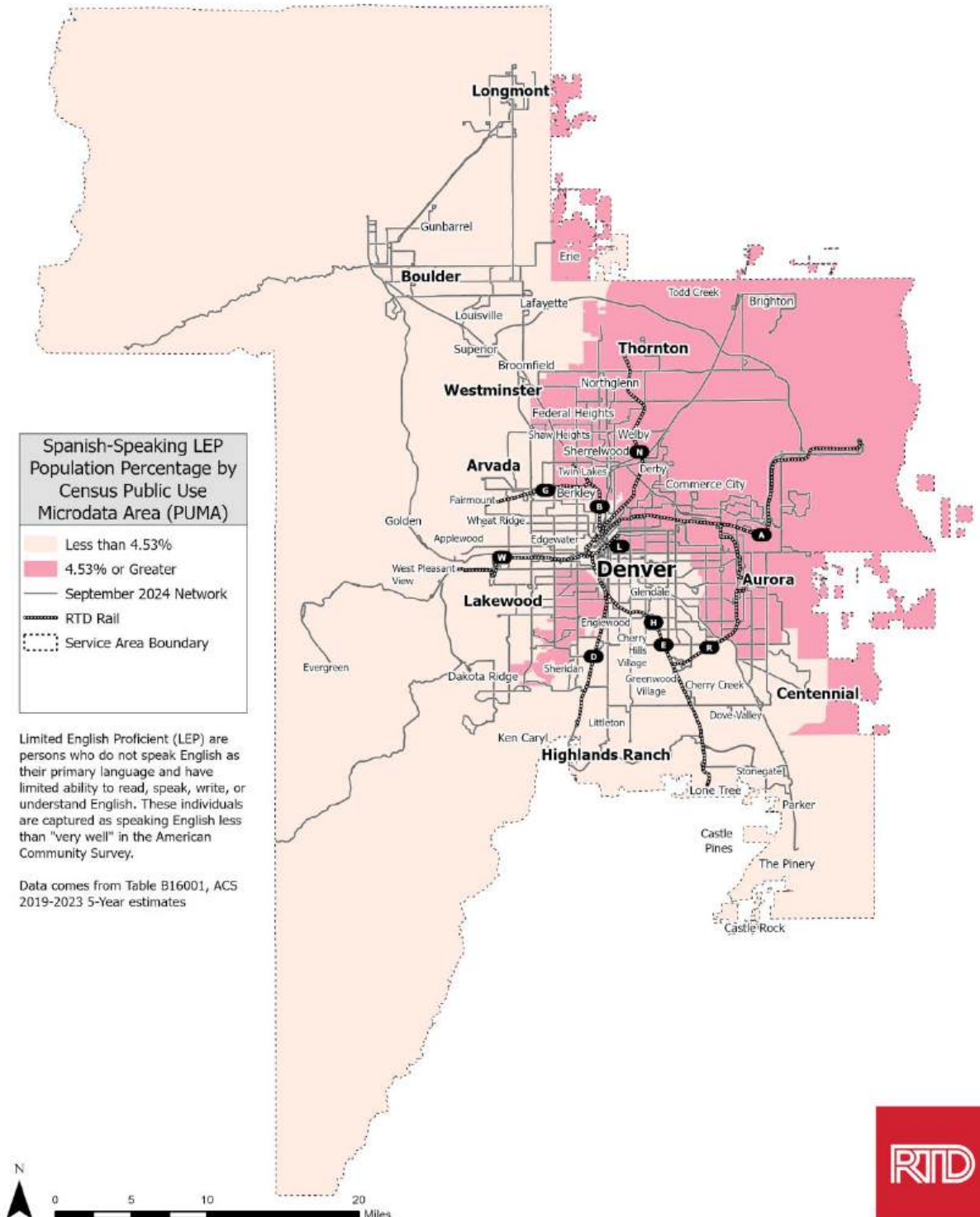
## All Limited English Proficient Population Distribution



# RTD 2025-2028 Language Access Plan

Figure 1.10. Distribution of Limited English Proficient Spanish Speakers Five Years or Older (PUMS)

## Limited English Proficient Spanish-Speaking Population Distribution

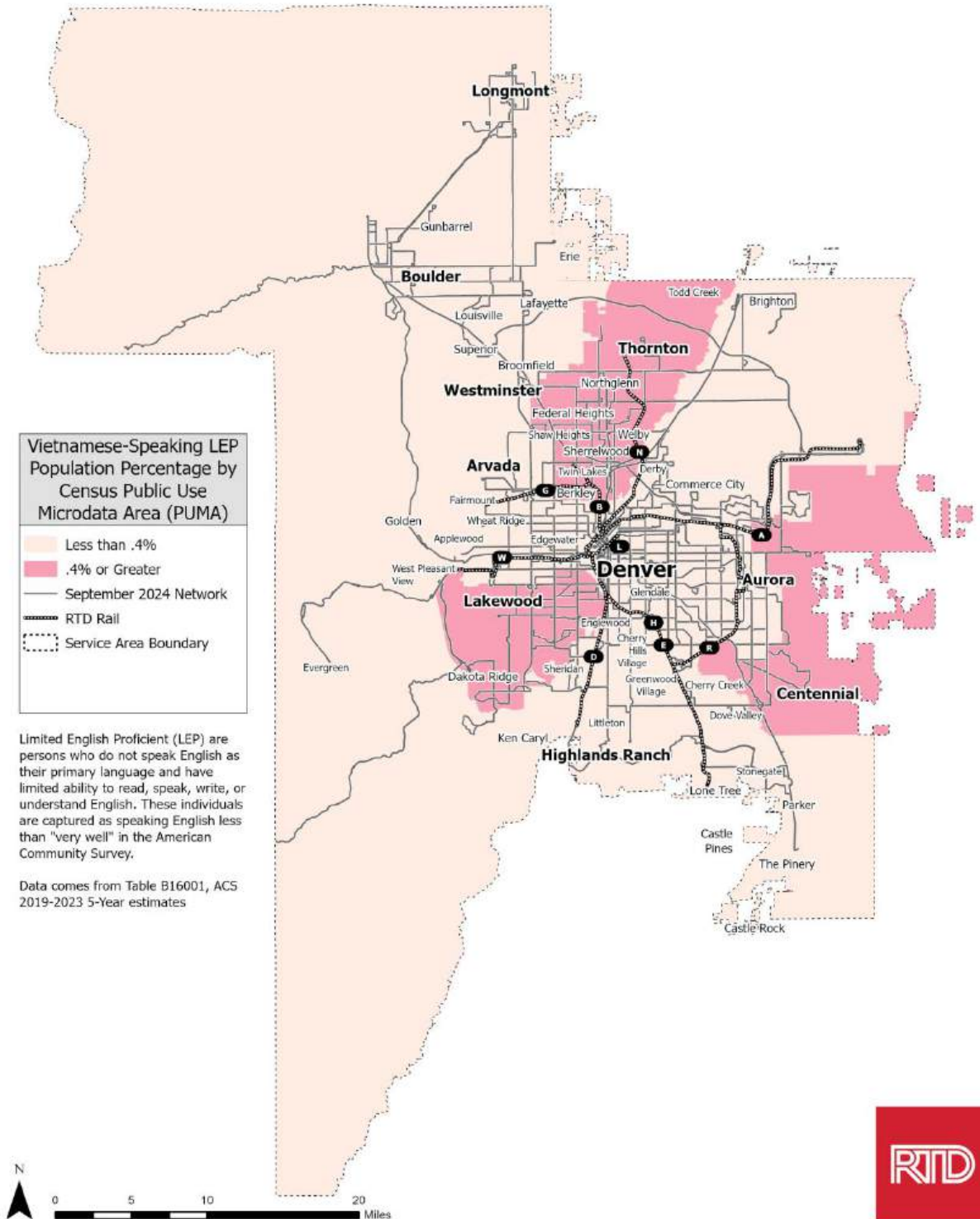




# RTD 2025-2028 Language Access Plan

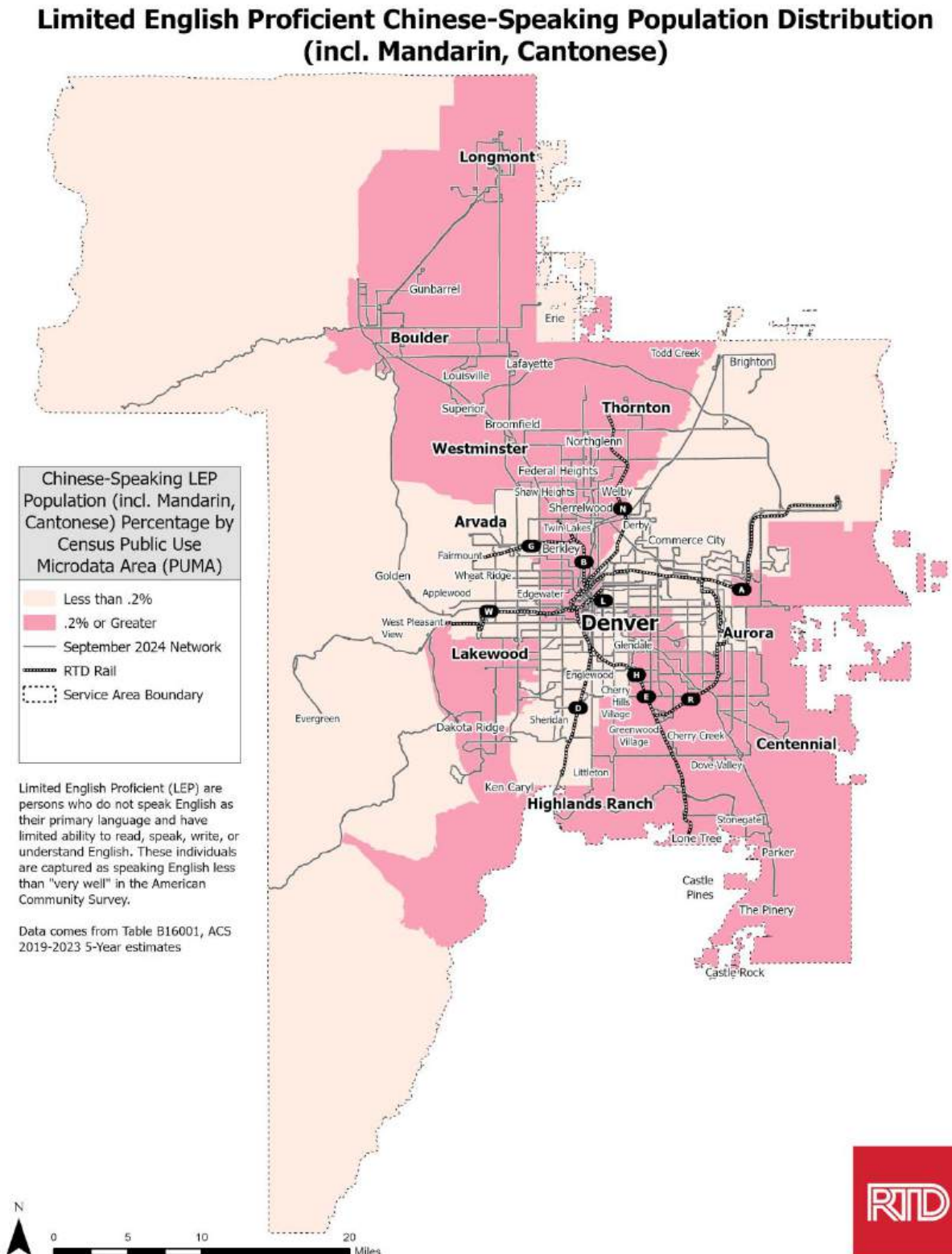
Figure 1.11. Distribution of Limited English Proficient Vietnamese Speakers Five Years or Older (PUMS)

## Limited English Proficient Vietnamese-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

Figure 1.12. Distribution of Limited English Proficient Chinese Speakers Five Years or Older (PUMS)





# RTD 2025-2028 Language Access Plan

## Colorado Department of Education (CDE)

In addition to ACS and PUMS estimates, the Factor 1 analysis incorporates the most recent Student Language of Origin data from the Colorado Department of Education (CDE) for the 2023-2024 school year.<sup>9</sup> This dataset provides insights into the languages spoken at home and enrollment in English as a Second Language (ESL) services among students from kindergarten through high school. It is reasonable to assume that if a child speaks a language other than English, their parents or guardians likely do as well, particularly for students receiving ESL services. While this dataset does not capture the number of non-school-age individuals who speak a language other than English, it serves as a valuable complement to Census (both ACS and PUMS) data in assessing linguistic diversity and, paired with Colorado Health Authority and qualitative data from RTD's outreach efforts, can help RTD finalize its list of safe harbor languages and inform language assistance measures.

Data were compiled from the following school districts serving students within the RTD district boundaries.<sup>10</sup>

*Figure 1.13. School Districts Included in Factor 1 Analysis*

School Districts			
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	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 generally aligns with ACS and PUMS data regarding the most commonly spoken languages among linguistically diverse populations generally, it shows a higher percentage of Spanish speakers in the school-age population as a percentage of the total school-age population that speak another language at home. Specifically, Spanish accounts for 75.4% of the school-aged population that speak a language other than English at home in the CDE dataset compared to 65.4% in ACS and 65.91% in PUMS for the general LEP population. Additionally, Arabic replaces Vietnamese as the second-most spoken language, pushing Vietnamese to third. Further, compared to the 2022-2025 Factor 1 analysis, both Russian and Amharic surpass Chinese to become the fourth- and fifth-most spoken language at home in the school-age population.

These languages are the same as those identified in the previous Factor 1 analysis, albeit in a slightly different order of prevalence. This CDE data reinforces ACS and PUMS data regarding the presence of Amharic and Nepali in local communities, confirming the need to add them to RTD's list of safe harbor languages.

<sup>9</sup> Colorado Department of Education: Languages Spoken at Home (2023-2024).

<sup>10</sup> RTD included school districts that have a minimum of one individual school with a zip code within RTD's service area.

# RTD 2025-2028 Language Access Plan

Figure 1.14. Languages Spoken at Home for School Districts within RTD's Service Area (2023-2024)

Language	Number of Students <sup>11</sup>	Percent of Students <sup>12</sup>
Spanish	96,074	75.4%
Arabic	3,082	2.4%
Vietnamese	2,769	2.2%
Russian	2,482	1.9%
Amharic	2,238	1.8%
Chinese, Mandarin	2,087	1.6%
Nepali	1,302	1.0%
French	1,192	0.9%
Korean	1,026	0.8%

## Colorado Health Authority

Finally, data were collected via the Colorado Health Authority from participating Colorado Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) clinics across Jefferson, Boulder, and Denver counties, as well as most of the City and County of Broomfield and portions of Adams, Douglas, Weld, and Arapahoe counties. The dataset covers the period from January 1, 2023 to December 31, 2024. Across these clinics, clients spoke 16 distinct languages. Figure 1.15 presents a frequency count of unique clients by spoken language.

Figure 1.15. Spoken Languages of WIC Clients within the RTD Service Area (2023-2024)<sup>13</sup>

Language	Average Monthly Enrollment in 2023	Average Monthly Enrollment in 2024	Average Percentage of Clients <sup>14</sup>
Spanish	13,106	16,618	75.9%
Other	1,487	1,583	7.2%
Unknown	1,590	1,375	6.3%
Arabic	381	409	1.9%
French	284	328	1.5%
Amharic	307	301	1.4%
Nepali	198	196	0.9%
Somali	197	180	0.8%
Tigrinya	138	152	0.7%

<sup>11</sup> RTD included all students who speak a language other than English at home in the analysis. This includes students who are enrolled in English as a Second Language (ESL) services by students ranging from kindergarten to high school.

<sup>12</sup> 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.

<sup>13</sup> 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.

<sup>14</sup> RTD utilized data that were not anonymized, therefore the percentages listed are estimates and should not be used to determine safe harbor languages.

# RTD 2025-2028 Language Access Plan

Russian	129	150	0.7%
Vietnamese	122	150	0.7%
Burmese	135	117	0.5%
Dari	-	114	0.5%
Swahili	95	108	0.5%
Karen	45	43	0.2%
Mandarin	43	30	0.1%
American Sign Language	35	32	0.1%
Karenni	28	23	0.1%
Total	<b>18,320</b>	<b>21,909</b>	<b>100%</b>

WIC data confirms previous findings that Amharic, Burmese, Karen, Nepali, Somali, and Swahili may warrant inclusion in language assistance measures and addition to RTD's safe harbor language list. Additionally, WIC data identified Tigrinya and Karenni as spoken languages that did not explicitly appear in other datasets but may have been grouped in all-inclusive "other" categories.

## Discussion

Factor 1 of RTD's Four Factor Analysis provides key insights into the languages that should be prioritized for language assistance and the geographic areas where these services are most needed. Using data from the ACS and PUMS, the analysis initially identifies 12 distinct languages that meet the safe harbor threshold. These include Arabic, Chinese, French, German, Hindi, Japanese, Korean, Persian (including Dari and Farsi), Russian, Spanish, Tagalog, and Vietnamese.

CDE and WIC data then allow RTD to differentiate specific languages from the ACS and PUMS datasets that group languages together by region. From these datasets, the Transit Equity Office has determined that Amharic, Burmese, Karen, Nepali, Somali, and Swahili should also be added to the safe harbor language list. Notably, WIC data highlights the presence of two other languages not captured in preceding datasets: Tigrinya and Karenni. Given the prevalence of Tigrinya in the Transit Equity Office's outreach efforts, Tigrinya has also been added to the list. However, TEO decided to exclude Karenni at this time given no exposure to this language through its work to date.

In conclusion, 19 languages serve as a foundational guide for RTD's language assistance efforts. The designated languages, listed in alphabetical order, are Amharic, Arabic, Burmese, Chinese (incl. Mandarin and Cantonese), French, German, Hindi, Japanese, Karen, Korean, Nepali, Persian (including Dari and Farsi), Russian, Somali, Tagalog, Tigrinya, Spanish, Swahili, and Vietnamese. This list is reflective of the languages the agency regularly interacts with when engaging with local communities, especially newcomer populations.

This is a reduction in the 21 safe harbor languages identified in the previous Factor 1 analysis, with the loss of Hmong, Khmer, Laotian, Telugu and Thai from the list paired with the new additions of Burmese, Karen, and Tigrinya.

These safe harbor languages can be organized into groups based on the average of all four data sources in Factor 1 to ensure a targeted and data-driven approach to language accessibility. It is essential to note that identification of the linguistically diverse populations by way of producing the safe harbor list is merely a guide for providing language assistance. Importantly, these data do not necessarily represent the language groups that are actually *using* RTD services. Moreover, language assistance activities should remain flexible to incorporate other languages that may not be listed as requested by the community or required by any given

# RTD 2025-2028 Language Access Plan

RTD project or activity. For additional information on how RTD will use the safe harbor language list to inform language access efforts, please see the Language Access Measures section following the Four Factor Analysis.

Figure 1.16. RTD’s Four Language Groups

Language Group 1	Language Group 2	Language Group 3	Language Group 4
Spanish	Vietnamese	Russian	Amharic
	Chinese (incl. Mandarin and Cantonese)	Arabic	Nepali
		Tagalog	Burmese
		German	Karen
		French	Somali
		Korean	Tigrinya
		Persian (incl. Dari and Farsi)	Swahili
		Japanese	
		Hindi	

Taken together, these findings provide a comprehensive understanding of the linguistic diversity within RTD’s service area, informing targeted language access initiatives. Ensuring language accessibility for Spanish, Vietnamese, and Chinese speakers, who continue to represent the largest linguistically diverse populations, remains a top priority. Since the last Factor 1 update, RTD has significantly expanded bilingual English/Spanish translations of key documents, signage, service and policy updates, and materials for community meetings. While these efforts have improved language access, further improvements are needed both for Spanish speakers and other less common language groups. For example, recent increases in Arabic-, Russian-, and Persian-speaking residents may reflect broader global migration trends driven by conflicts in Ukraine, Palestine, Afghanistan, and Syria. These shifts underscore the importance of a flexible, data-informed approach to language assistance. Finally, Factor 1 data allow RTD to strategically allocate language assistance resources based on geographic needs. Transit routes and services in areas with high concentrations of linguistically diverse populations, particularly throughout Aurora, southeast Boulder, north Denver into Thornton, and east Lakewood/west Denver should be prioritized for expanded language access initiatives. By continuously assessing demographic trends and implementing targeted engagement strategies, RTD can ensure that all customers, regardless of the language they speak, have equitable access to transit services.

## Factor 2: Frequency of Contact with Linguistically Diverse Persons

### Methodology

To complete Factor 2, the Transit Equity Office (TEO) conducted surveys with employees who are likely to interact with customers from October 14 through November 8, 2024. TEO crafted the survey based on the Factor 2 survey in the agency’s 2022-2025 Four Factor Analysis, though this newest version omitted questions deemed

# RTD 2025-2028 Language Access Plan

no longer relevant and rephrased several questions to improve clarity.<sup>15</sup> TEO distributed the surveys in both paper and digital formats to employees via managers, Division Managers, and liaisons at RTD as well as contracted facilities. Please find the survey copy in Appendix B.

The survey received 662 responses (excluding staff who reported never interacting with customers), with 225 responses to the online version and 437 responses to the paper version. This represents a 15.6% increase in responses from the 614 responses received to the 2021 version of this survey. Please note that total response rates may vary question-to-question, as respondents may have skipped questions. Additionally, percentages may not add up to 100% due to rounding or if a question allowed respondents to select multiple answers to a question.

## Key Findings

Customer-facing staff at RTD increasingly interact with linguistically diverse customers, with daily interactions rising significantly since 2021. Currently, 40% of respondents report daily interactions and 26% report near-daily interactions, compared to 26% and 21%, respectively, in 2021. Most of these interactions are in person, with 86% occurring on buses, trains, and at stations or stops. A smaller percentage, 16%, occur over the phone; 4%, online. Most inquiries from linguistically diverse customers pertain to trip-related topics, including directions, fares, and schedules. Notably, conversations about language assistance services have more than doubled since 2021, increasing from 6% to 13%.

Staff employ various methods to communicate with linguistically diverse customers. The most common methods include using translation apps on their phones (47%), relying on body language or simplified English (44%), asking other customers to interpret (30%), speaking directly in the customer's language (29%), and seeking assistance from coworkers (26%). Among staff who reported speaking another language, Spanish is the most common (53%), followed by Amharic (13%), French (7%), Arabic (7%), and Oromo (4%). Less staff use resources like Customer Care (20%), informational signage (16%), the RTD website (8%), or translated brochures (5%). Perceptions on the effectiveness of these methods varies.

Despite these efforts, communication challenges remain prevalent. Most staff find it difficult to interact with customers who speak little or no English, with 18% describing it as extremely difficult and 52% as somewhat difficult — a statistically significant increase from 2021, when 10% found it extremely difficult and 47% found it somewhat difficult.<sup>16</sup> These challenges may stem from an actual lack of resources or unfamiliarity with available resources, as only 46% of staff feel somewhat or very equipped to communicate with linguistically diverse customers, while 21% feel not at all equipped and 33% feel only somewhat equipped.

To address these barriers, staff recommend RTD make several improvements, including providing translation devices, offering language classes (particularly in Spanish), and increasing the availability of translated materials and signage. Some also suggest implementing direct access to telephonic interpretation services and hiring more multilingual employees to better serve RTD's diverse customer base.

## Results

### *Respondent Characteristics*

Most of the 662 survey respondents work in Bus Operations (57%), as shown in Figure 2.1. After Bus Operations, the top departments/divisions where respondents work are Rail Operations (11%), Paratransit (7%),

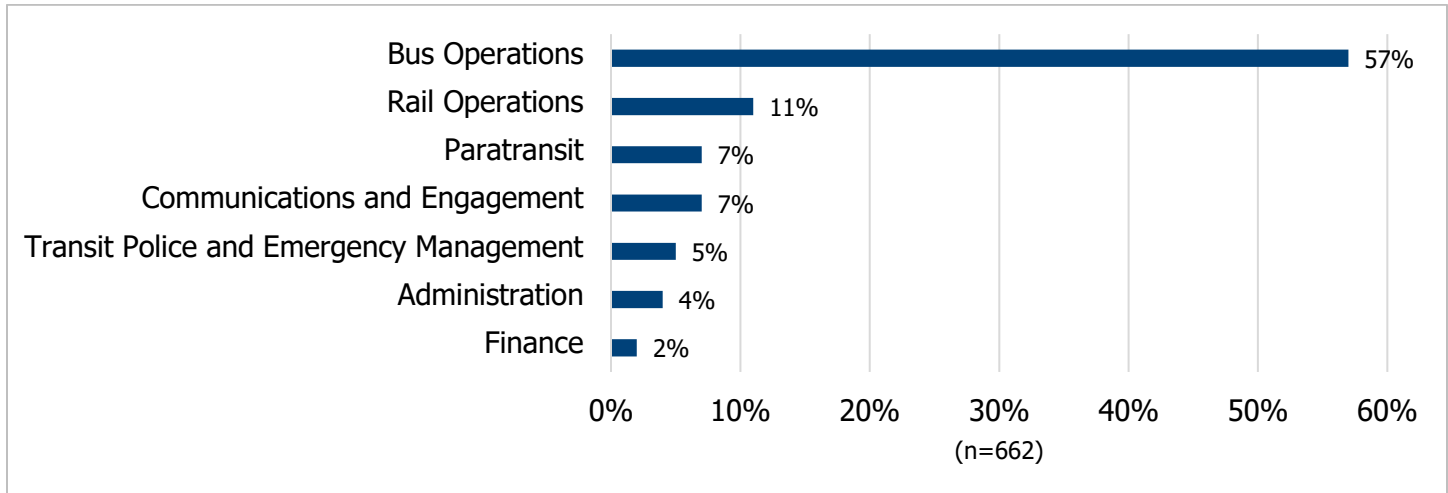
<sup>15</sup> Though altering questions complicates some statistical comparisons between this survey and its predecessor, the questions in their updated form will allow for improved year-over-year comparisons moving forward.

<sup>16</sup> An independent t-test comparing 2021 and 2024 survey responses found that employees in 2024 reported significantly greater difficulty interacting with LEP customers ( $p < 0.001$ ) compared to 2021.

# RTD 2025-2028 Language Access Plan

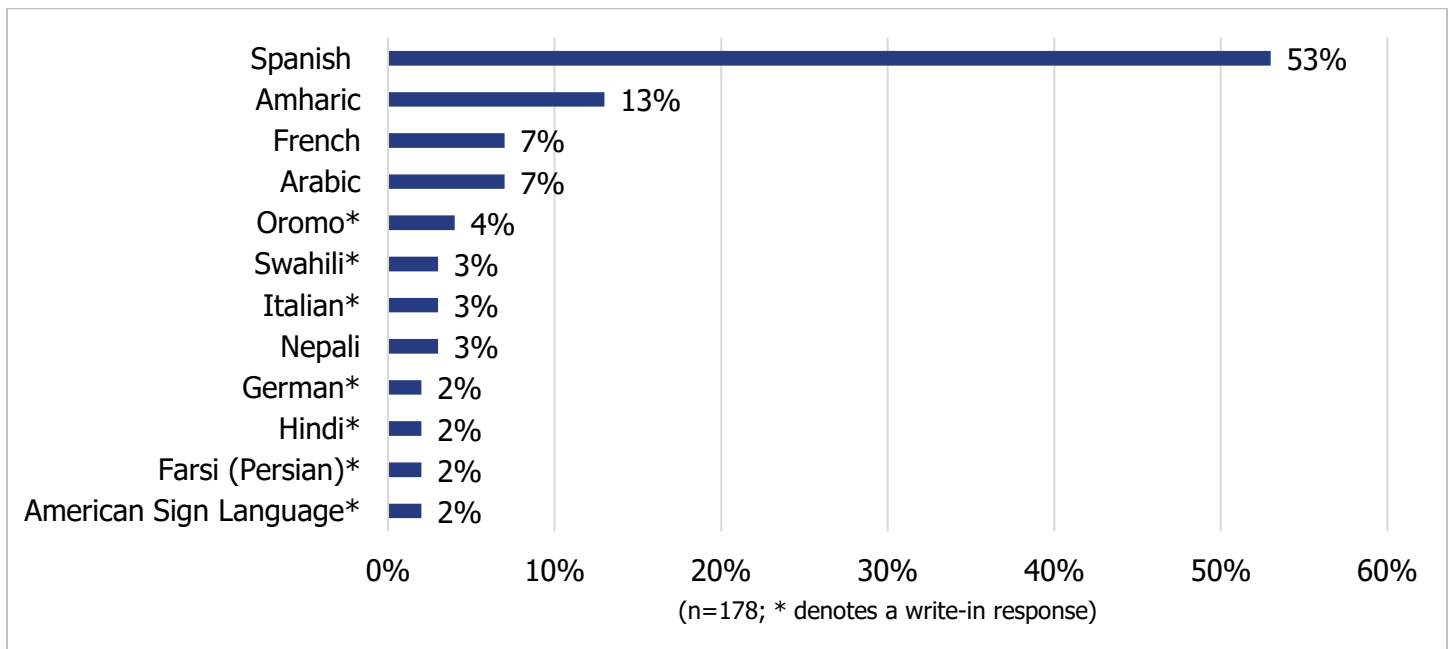
Communications and Engagement (7%), Transit Police and Emergency Management (5%) and Administration (non-specified; 4%). Planning, Human Resources, General Counsel and Capital Programs staff each comprised 1% of respondents. Overall, respondents to this survey represented more diverse business units than in the 2021 survey, where 71% worked in Bus Operations, 16%, Rail Operations; 11%, Communications; and 2%, Paratransit.

*Figure 2.1. Respondents' Departments*



Thirty percent (30%) of respondents (180 employees) speak another language fluently besides English, where fluency indicates that the respondent can speak and read in a language easily and quickly without difficulty or errors. According to Figure 2.2, most (53%) speak Spanish, followed by Amharic (13%), French (7%), Arabic (7%) and Oromo (4%).

*Figure 2.2. Languages Spoken by Respondents Fluently Besides English*



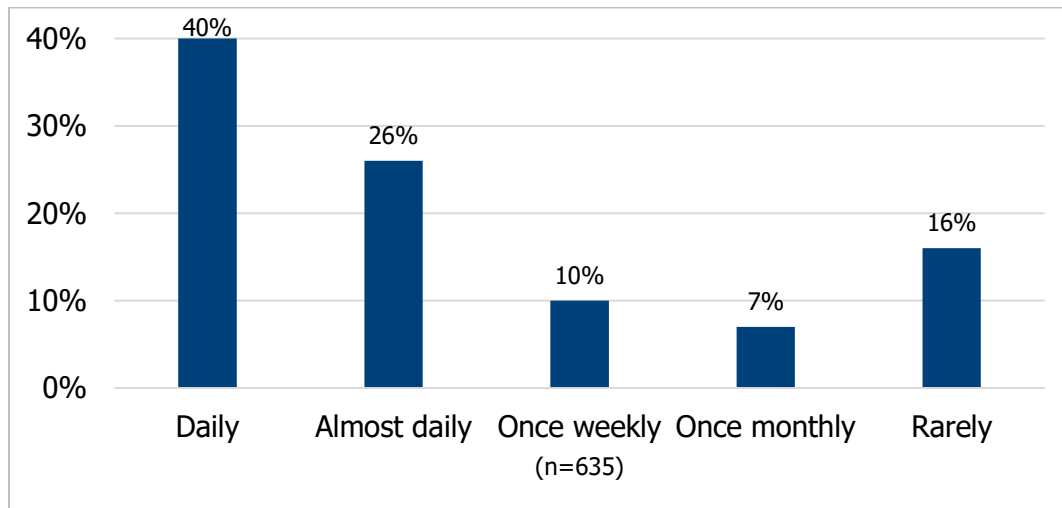


# RTD 2025-2028 Language Access Plan

## ***Frequency and Location of Interactions with Linguistically Diverse Customers***

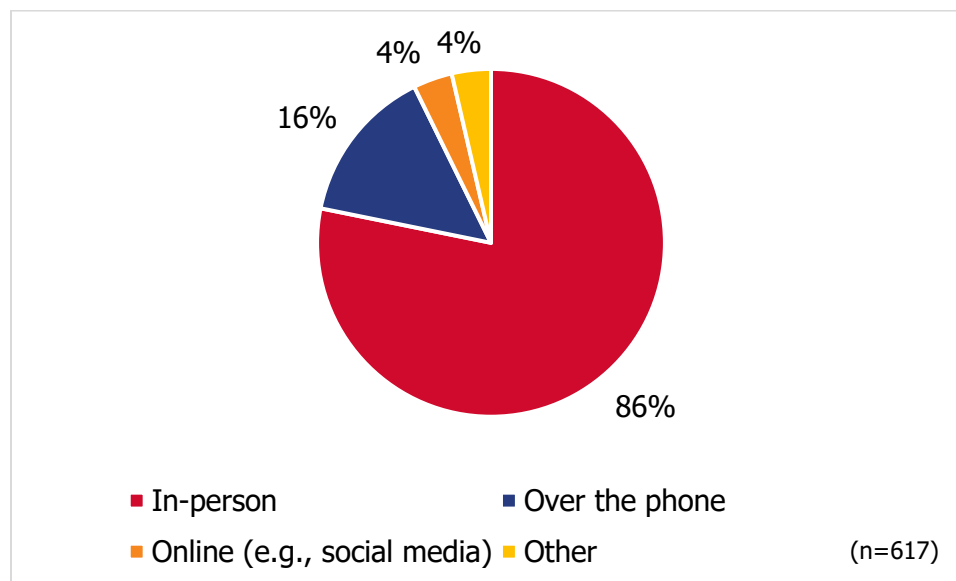
Unsurprisingly, these staff interact with customers frequently. 67% report interacting with customers daily, while another 15% interact with customers almost daily; 4%, once weekly; 3%, once monthly; and 7%, rarely (Figure 2.3). Of those, interactions with customers who are limited English proficient are common. Forty percent (40%) of respondents interact with linguistically diverse customers daily — this is almost a 60% increase from 2021, where just 26% respondents noted interacting with linguistically diverse customers daily.

*Figure 2.3. Frequency of Interactions with Linguistically Diverse Customers*



Overall, the vast majority (76%) interact with linguistically diverse customers at least once weekly, and Figure 2.4 demonstrates that most of these interactions occur in-person (78%) as opposed to over the phone, online or in other ways.

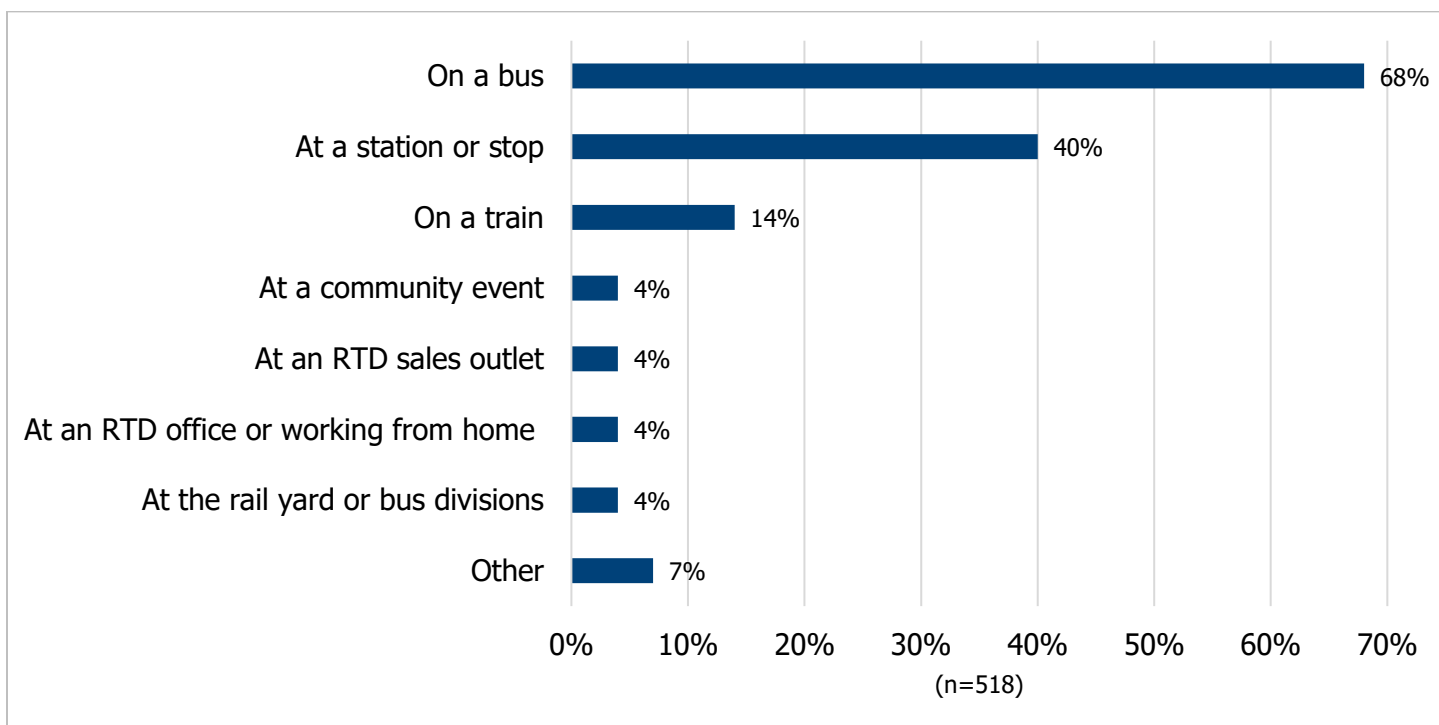
*Figure 2.4. Type of Interactions with Linguistically Diverse Customers*



The locations of in-person interactions vary, but most occur on a bus (68%), at a station or stop (40%) or on a train (14%; Figure 2.5).

# RTD 2025-2028 Language Access Plan

Figure 2.5. Location of In-Person Interactions with Linguistically Diverse Customers



The top five most cited bus routes, stations, stops and rail lines for interactions with linguistically diverse customers are listed in Figure 2.6 below. Note that many respondents indicate “all” routes, stations/stops, and rail lines, demonstrating the prevalence of interactions with linguistically diverse customers across the system. “All routes,” as well as the 15, 0, and 16, were some of the most common responses to the previous Factor 2 survey as well.<sup>17</sup>

To view all routes, stations/stops and lines respondents cited, please visit *Employee Interaction Locations* in Appendix C.

Figure 2.6. Top Five Bus Routes, Stations/Stops, and Rail Lines for Interactions with Linguistically Diverse Customers

Bus Routes	Response Count
<b>All Routes</b>	65
<b>15</b>	53
<b>0</b>	28
<b>16</b>	26
<b>40</b>	22

Stations or Stops	Response Count
Union Station	43
All Stations	33
Civic Center	14
Peoria	11
Central Park	10

Rail Lines	Response Count
<b>N</b>	16
<b>All Rail Lines</b>	13

<sup>17</sup> Comparing this survey’s results on rail lines to previous results is challenging, as small differences may reflect shifts in the business units of respondents rather than changes in interaction locations (e.g., a higher proportion of N Line staff may have participated this time).

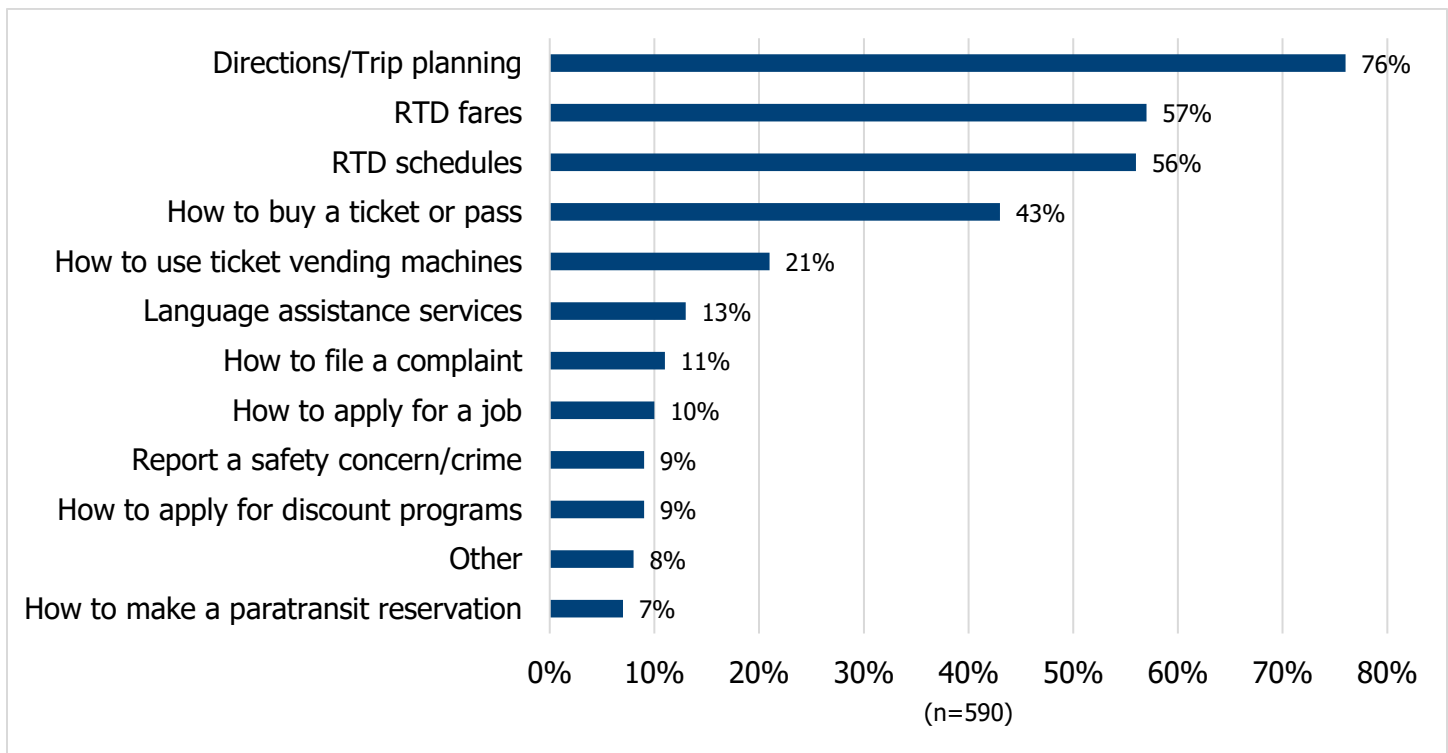
# RTD 2025-2028 Language Access Plan

<b>A</b>	9
<b>R</b>	8
<b>H</b>	8

## ***Characteristics of Interactions with Linguistically Diverse Customers***

When interacting with linguistically diverse customers, respondents note a range of topics that the customers ask questions about. Figure 2.7 illustrates that the most common topic is directions and trip planning (76%), followed by fares (57%), schedules (56%) and how to buy a ticket or pass (43%).

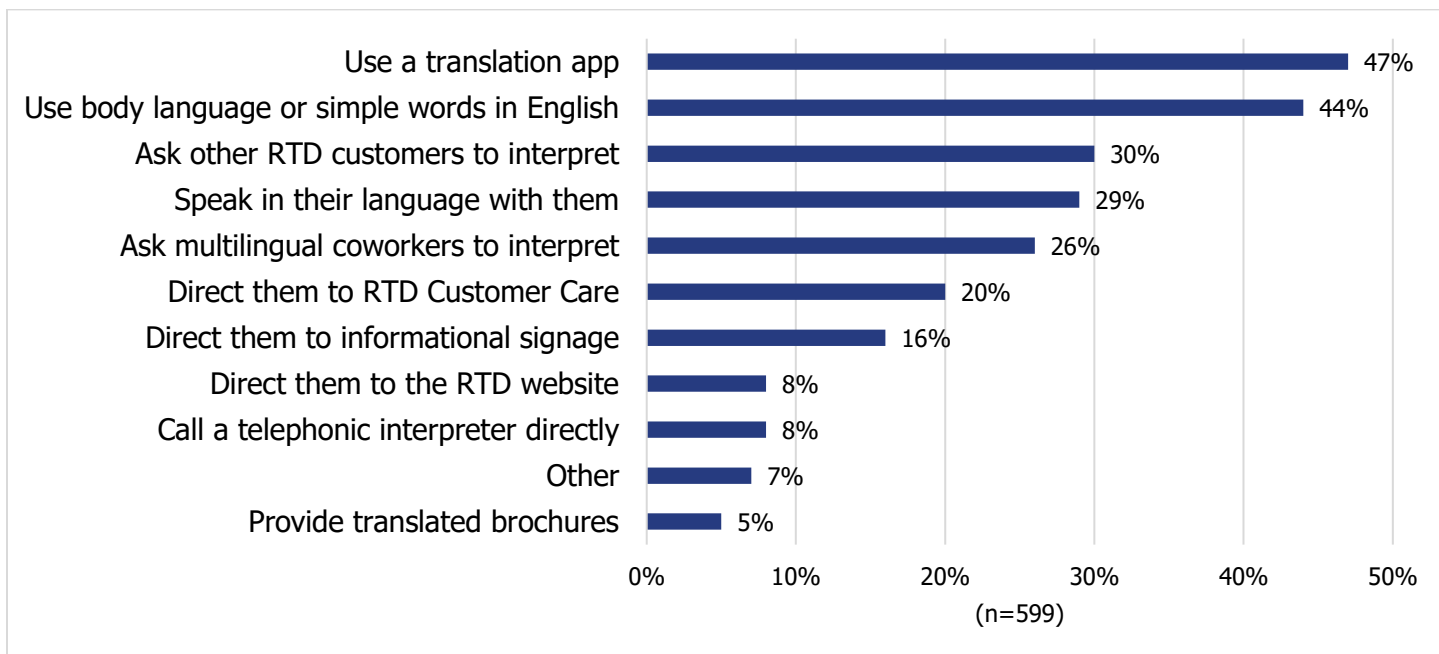
*Figure 2.7. Topics of Conversations with Linguistically Diverse Customers*



But if there is a language barrier present, how do respondents communicate with customers in these conversations? Forty-seven percent (47%) use a translation app on their phones, such as Google Translate, DeepL or Microsoft Translator (Figure 2.8). Forty-four percent (44%) use body language, such as hand gestures, or simple words to try to communicate in English. Thirty percent (30%) ask other RTD customers to interpret for them, and another 29% speak in the customers language with them given their multilingual skills.

# RTD 2025-2028 Language Access Plan

Figure 2.8. Communication Methods Used with Linguistically Diverse Customers



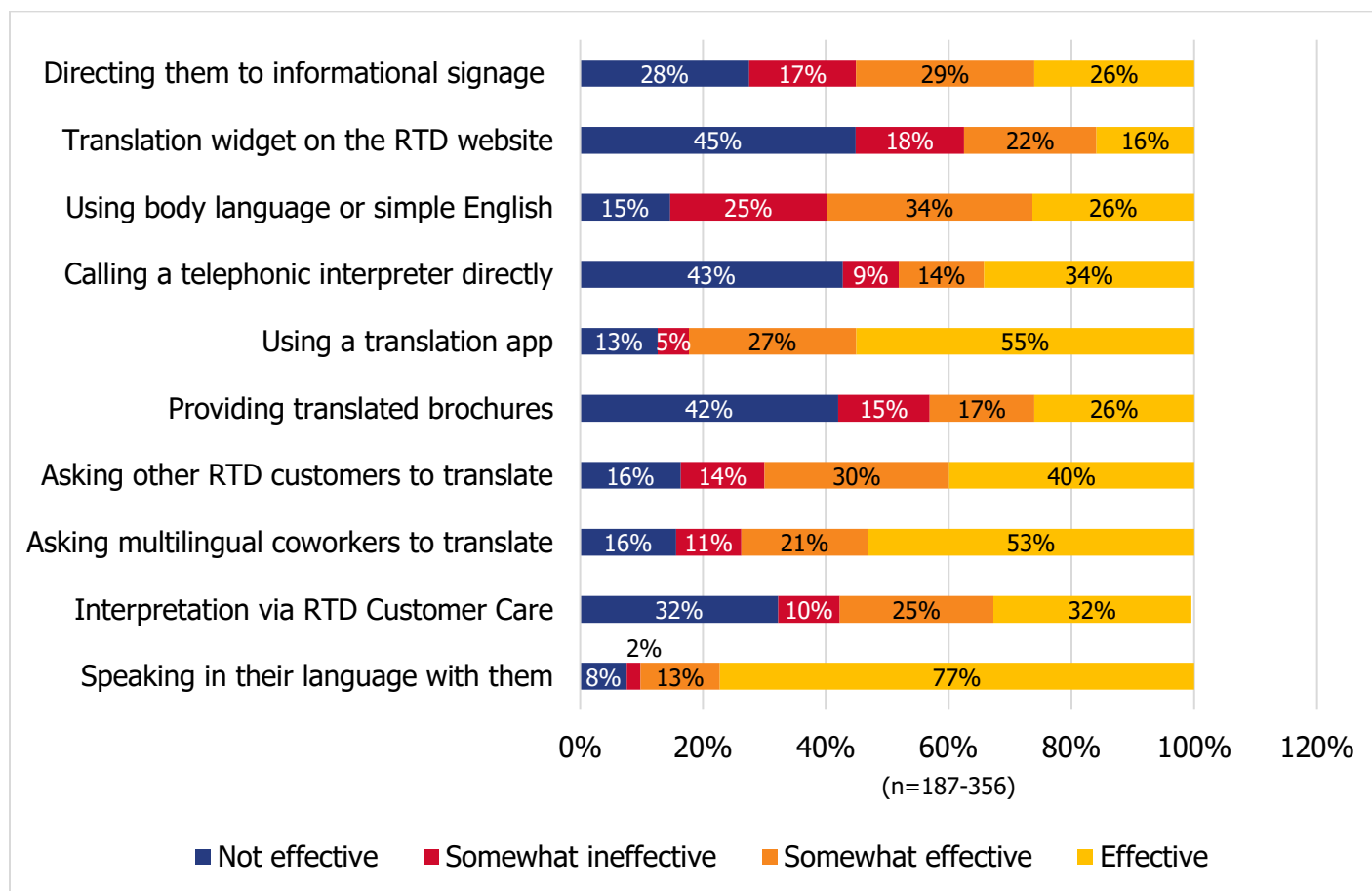
The methods respondents use to interact with customers do not necessarily correspond to how *effective* they believe that communication method to be; respondents' opinions on effectiveness varies, as shown in Figure 2.9. For instance, 82% of respondents perceive the use of translation apps to be somewhat effective or effective methods to communicate, which aligns with the high reported use of this communication method (46%).<sup>18</sup> Conversely, where many respondents note the use of body language or simple words to try to communicate in English, only 60% report that this is a somewhat effective or effective communication method. On the other hand, fewer respondents ask RTD customers or multilingual coworkers to interpret (30% and 26%, respectively), but employees generally find these people-forward approaches quite effective (70% somewhat effective or effective and 64% somewhat effective or effective, respectively).

Respondents tend to have the strongest perceptions of ineffectiveness towards the translation widget on the website, providing translated brochures and calling a telephonic interpreter directly (63%, 57%, and 52% not effective or somewhat ineffective, respectively).

<sup>18</sup> This is true even though respondents consistently noted RTD technology policy as a key hindrance to using a translation app as a communication method; see *Staff Recommendations to Improve Communication with Linguistically Diverse Customers* below.

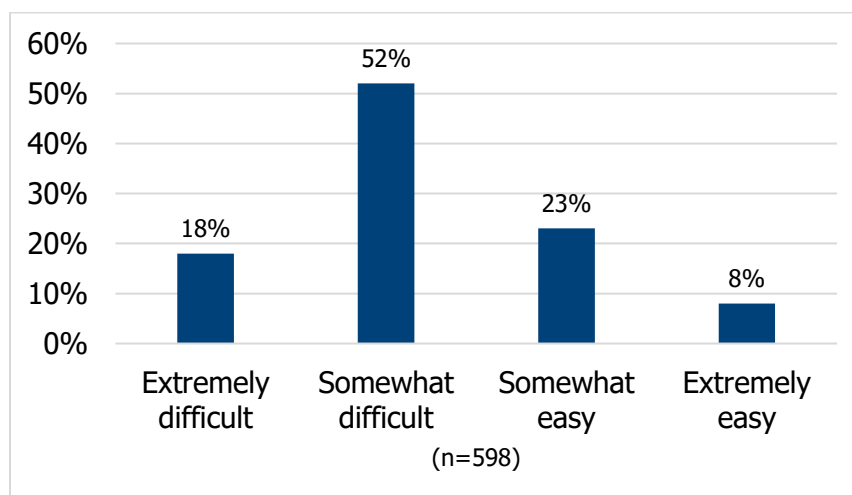
# RTD 2025-2028 Language Access Plan

Figure 2.9. Perceptions of Communication Methods' Effectiveness<sup>19</sup>



Regardless of communication methods used and their perceived effectiveness, many respondents find it either somewhat difficult (52%) or very difficult (18%) to communicate with customers who speak little or no English (Figure 2.10).

Figure 2.10. Level of Difficult Communicating with Linguistically Diverse Customers

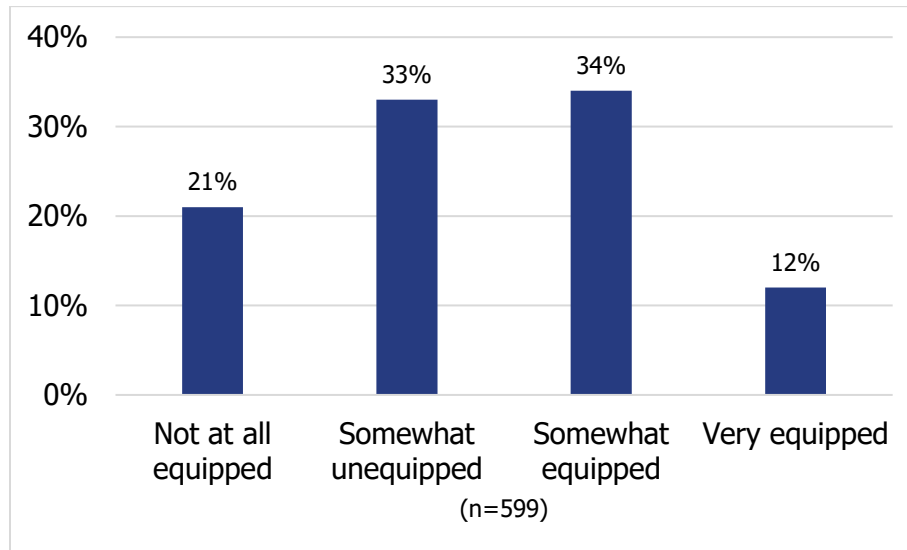


<sup>19</sup> Respondents who marked "Not Applicable" to this question in the survey were excluded from this chart.

# RTD 2025-2028 Language Access Plan

Per Figure 2.11, this is not surprising given that most also feel either somewhat unequipped (33%) or not at all equipped (21%) to communicate with these customers.

*Figure 2.11. Feeling of Being Equipped to Communicate with Linguistically Diverse Customers*



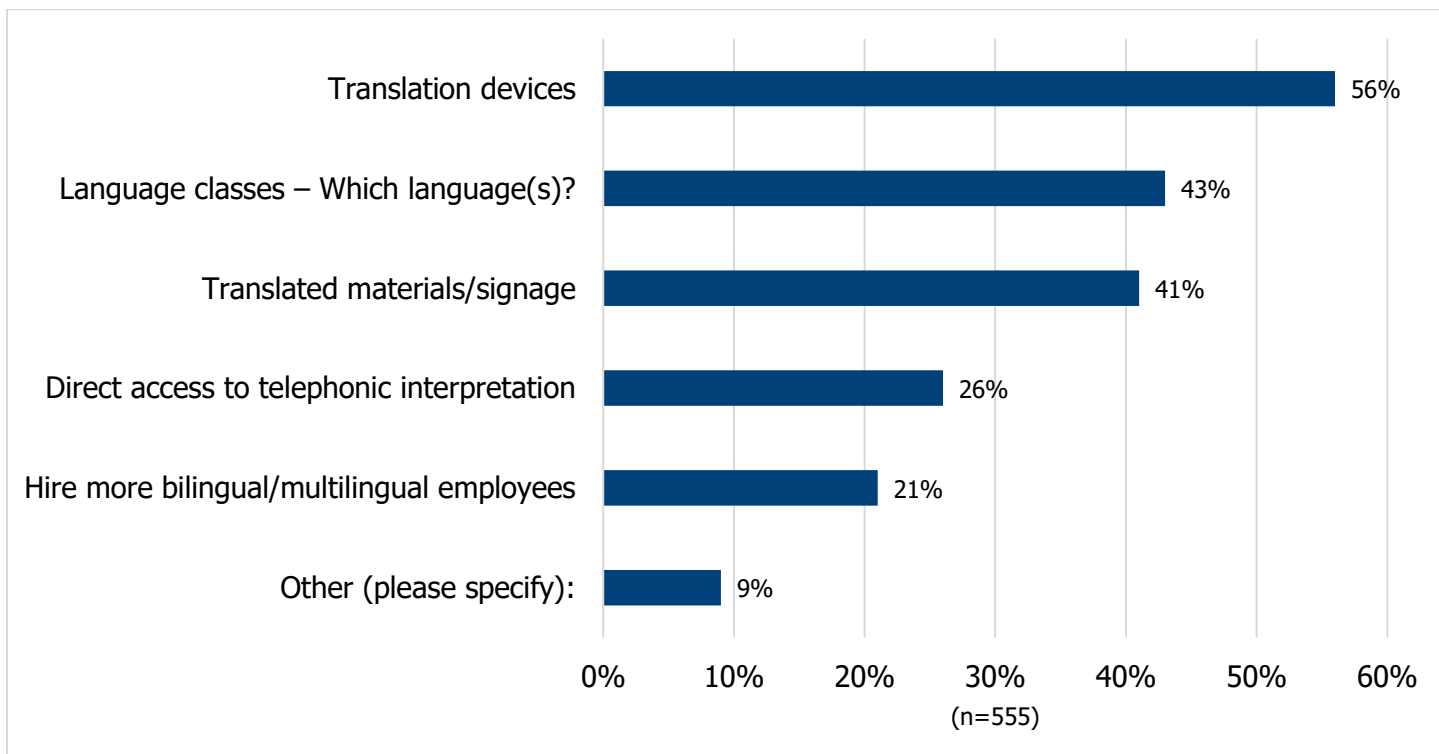
## ***Staff Recommendations to Improve Communication with Linguistically Diverse Customers***

When asked what materials, services, or tools RTD could provide to make them feel more equipped and to improve communication with customers who speak little or no English, many respondents (56%) would like access to translation devices, where 43% would like access to language classes and 41% would like more translated materials and signage (Figure 2.12). This is a similar result to the 2021 survey, in which translated materials, a “translation tool” and language training classes were the most popular write-in responses. When asked which language classes they would like, 69% of respondents indicate Spanish; 5%, Chinese; 4%, American Sign Language; and 3%, Arabic and French.



# RTD 2025-2028 Language Access Plan

Figure 2.12. Recommendations for Improving Communication with Linguistically Diverse Customers



In response to an open-ended question inviting additional suggestions, the following themes arose and expand upon the responses offered in the multiple-choice question above. The quotations were taken directly from the survey responses and have not been revised.

## Technology and Policy

Many respondents emphasize the importance of technological solutions for addressing language barriers. While many speak to the installation of translation devices on buses and at stations/stops, there were some who also feel that RTD policy (specifically, Rule 18: Cell Phone and Other Mobile Electronic Device Usage in the RTD Trailblazer) prevents them from adequately providing language assistance via their personal phones. Importantly, though, this rule exists mainly due to safety concerns and finds its roots in FTA and Federal Motor Carrier Safety Administration (FMCSA) regulations prohibiting or severely restricting cell phone use while driving transit vehicles.

"Allow operators access to their phones so we can use the programs and abilities provide by our personal devices to access better communication between operators and riders. Having to grab your powered off device out of your bag then stepping out of the cab only to have to power it on, wait for it to power up and communicate with the network before you can even access the tools we need for that single interaction. Now multiply that by however many times you need to do that in a shift. This isn't even counting the time you need to power it off again and store it in your bag once more."

"There needs to be more technology resources provided in how to effectively assist the customer. Whether we provide it or have a resource guide to provide."

"Not able to use our phones get fired"

"Device to help with language barriers"

# RTD 2025-2028 Language Access Plan

"Our phones can help translate"

"Devices that can hear and read"

"Put translate app on copilot"

"Translation devices - big time"

"Need a translating device to interpret directly to them"

"Using Google translate but phones are not allowed"

"Communication device/translation"

"Add Google translate to all ticket kiosks"

"Communication Technology in General"

## Enhance and Expand Audio Announcements

Several respondents note how audio technology could be used to improve communications, both on vehicles and at stops or stations. They suggest improving English audio announcements and adding Spanish audio announcements on both bus and rail vehicles — with consideration for other languages.

"I think translated announcements of bus bridges or service delays at CR stops would be extremely beneficial to many of our customers. Many of our customers only speak Spanish, so I think that translating audio and visual announcements into Spanish would be a good and reasonable starting point to providing equitable and accessible service to our customers."

"Better signs near tracks. Audio announcements all the time. for example, "the Airport train is located on track one. Light Rail trains are located on Chestnut and 17<sup>th</sup>."

"Audio device in bus"

"Have announcements in different languages"

"Automated announcements in more languages"

"Incorporate into existing Radio on busses"

## Translate and Modify Signage

Respondents suggest that signage could better support multilingual communication by including translations and incorporating non-written methods, such as the use of colors and images, into signage design to assist linguistically diverse customers.

"Add language options to some signage. Or a separate sign for multilingual at union station. Signage in multiple languages"

"More translated/picture-based signage, improved communications about availability of language assistance."

"Signage in multiple languages"

"Signs need to be hung more convenient locations."

"Color coding"

"More specific information on digital boards"

"Simple fare interpretation and maps"

## Expand Language Accessibility of RTD's Digital Tools and Customer Care Working Hours

RTD's website translation widget currently supports English, Spanish, Vietnamese, Russian, and Korean; however, some respondents recommend adding more languages, which is already in development. Additionally, respondents note that RTD's Customer Care is not available during certain times when services are in use,

# RTD 2025-2028 Language Access Plan

leading to suggestions for extending its hours to better assist customers or making another 24/7 language assistance service available. Respondents also note that RTD phone apps, such as MyRide, are only available in English.

"Expanded languages on RTD website"

"Make customer care available 24/7"

"RTD app in Spanish"

"24-hour Translator"

## Hire Bilingual/Multilingual Staff and Compensate Them for Language Use

Respondents emphasize the importance of RTD intentionally hiring bilingual/multilingual staff and recommend compensating employees for using their language skills in their work as an ongoing recognition of their value (e.g., by way of a pay differential).

"Pay employees who speak another language more. This may help those who currently are not bilingual to learn another language."

"Hire more bilingual/multilingual customer service employees who speak other languages commonly used in our RTD districts such as: Arabic, Persian, Mandarin, etc. Many employers have employees from those countries, they could help us in other RTD departments."

"More effectively recognize and utilize those bilingual employees already working for RTD"

"Hire more bilingual/multilingual employees"

"RTD needs more people fluent in Amharic"

## Provide Staff with Language Assistance Tools

In addition to educational resources, respondents would like to have other assets on hand to help overcome language barriers, such as sheets with translated phrases.

"a cheat sheet with common phrases like  
"Where are you going?""

"Booklet with related info"

"Maybe a cheat sheet laminated card or  
something?"

## Support Staff Language Learning

Respondents express interest in learning additional languages if classes and other educational resources were more readily available. Respondents request Spanish classes the most, with American Sign Language equally popular.

"Provide language classes that teach very specific words and phrases related to transit and giving people directions."

"Teaching RTD employees and personnel the transit basics in various languages."

"Learning a 2nd language would help or having a communication board"

"I would love to see online ASL and Spanish classes made available"

"More language training"

"I'd try Rosetta Stone or equivalent if offered"

# RTD 2025-2028 Language Access Plan

“Teach ASL & Spanish”

## Discussion

The survey results highlight a notable increase in daily interactions between customer-facing RTD staff and linguistically diverse customers since 2021, emphasizing the growing importance of effective communication strategies in an increasingly diverse community. These interactions predominantly occur in person, often on buses, trains, and at stations or stops, underscoring the need for staff to have pragmatic, real-time language assistance tools that meet their needs as well as the needs of customers. Despite efforts by staff to bridge language barriers through translation apps, body language and multilingual skills, many still report challenges in effectively communicating with customers who speak little or no English.

The significant rise in conversations about language assistance services suggests increased awareness or demand among customers for these resources. However, less than half of staff feel adequately equipped to handle such interactions, reflecting a need for targeted interventions. This is especially notable given that the Civil Rights Division released its first Serving Non-English-Speaking Customers training to frontline staff in 2022, which outlines strategies for communication across language barriers as well as the various tools available to do so. Recommendations from staff, such as access to translation devices, language classes (with a focus on Spanish), and additional multilingual signage and materials, offer actionable pathways to enhance communication. Moreover, the call for hiring more multilingual employees and compensating them for their skills highlights the value placed on linguistic diversity within the workforce.

Addressing these needs will not only improve the customer experience for linguistically diverse individuals but also support RTD staff in delivering equitable and efficient transit services and programs. Implementing these solutions should be a priority as RTD moves forward with its Language Access Plan from 2025 to 2028.

## Factor 3: Nature and Importance of RTD Services to Linguistically Diverse Persons

To complete Factor 3, the Transit Equity Office (TEO) conducted two different studies with linguistically diverse people: a survey and a focus group. Doing so allowed TEO to gather both quantitative and qualitative data to explore the nature and importance of RTD services to this population.

Both studies are described in full below.

## Language Access Survey

### Methodology

TEO conducted surveys with linguistically diverse people from December 30, 2024 through February 2, 2025.<sup>20</sup> Survey languages included Amharic, Arabic, Burmese, Simplified Chinese, English, Farsi, French, Karen, Korean, Nepali, Russian, Spanish, Swahili, and Vietnamese. TEO distributed the surveys in both paper and digital formats directly to community members as well as to community-based organizations who shared them with the populations they serve, using a communications toolkit that TEO produced.<sup>21</sup> These community-based organizations included (but were not limited to) the African Community Center, Aurora Asian Pacific Community Partnership, Aurora Mental Health, Boulder County Mobility for All, Caring for Denver, Colorado Vietnamese

<sup>20</sup> Though altering questions complicates some statistical comparisons between this survey and its predecessor, the questions in their updated form will allow for improved year-over-year comparisons moving forward.

<sup>21</sup> The toolkit included 11” by 17” posters, 8.5” by 11” and half-page flyers, social media graphics, blurbs, paper copies of the surveys, the survey drawing rules, and talking points.

# RTD 2025-2028 Language Access Plan

Cooperation Council, CREA Results, Denver Public Library, Denver Regional Mobility and Access Coalition (DRMAC), Denver Streets Partnership, Empowering Communities Globally, Hope Communities, Little Saigon Denver, Organization for Chinese Americans, Russian Cultural Center, and the Vietnamese Community of Colorado. Additionally, TEO published half-page advertisements of the surveys in several multicultural publications — specifically, Colorado Chinese News, El Comercio de Colorado, and the Weekly Focus<sup>22</sup>.

Figure 3.1. Screenshot of Little Saigon Sharing RTD's Language Access Survey in Vietnamese



The survey received 578 responses (133 paper and 445 digital), excluding people who:

- Did not meet the threshold for limited English proficiency,<sup>23</sup>
- Only wrote English as their preferred language, or
- Reported living outside of the state of Colorado

This represents a 180% increase from the 206 responses received in the 2021 version of this survey. The increased participation is likely due to improved distribution thanks to strengthened relationships with community partners and contracting with community-based organizations to support survey outreach.

Note that total response rates may vary question-to-question, as respondents may have skipped questions. Additionally, percentages may not add up to 100% due to rounding or if a question allowed respondents to select multiple answers to a question.

Please find a copy of the paper survey in Appendix D.

<sup>22</sup> Korean newspaper

<sup>23</sup> RTD used the US Census definition of "limited English proficient" to establish this threshold — specifically, those who speak, write, read, or understand English less than "very well."

# RTD 2025-2028 Language Access Plan

## Key Findings

The results of the survey highlight the critical role language access plays in reducing barriers and ensuring equitable transit services for linguistically diverse communities.

- **Respondent Characteristics:** Compared to the 2021 survey, the 2024-2025 respondents are more likely to have significant language barriers, with fewer indicating they can read, write, or understand English well. The majority (73%) speak Spanish, followed by Chinese (18%), with 23 languages represented overall. Additionally, most respondents identify as Hispanic or Latine (71%) and female (63%).
- **Transit Usage and Barriers:** Most respondents (70%) frequently use RTD buses, while train usage is lower (41%), and demand-response services are rarely used. Sixty-one percent (61%) of respondents report not having access to a household vehicle, indicating high reliance on transit for mobility. While 51% say they use RTD as much as needed, nearly a third (29%) report that language barriers prevent them from using transit more often. Other concerns include limited service availability and infrequent schedules.
- **Access to RTD Information:** Respondents primarily obtain transit information through the RTD website (29%), signage (22%), and the Next Ride app (16%). However, many struggle to navigate key RTD services. For example, over 70% do not know how to apply for discounts, report a safety concern, or make a customer service complaint.
- **Importance of Language Assistance:** Respondents overwhelmingly support expanded language assistance services, with 86-89% rating options such as translated signage and multilingual staff as very or extremely useful. They also find it crucial to receive information in their preferred language on topics such as trip planning, fare discounts, and safety reporting.

Survey participants provided detailed suggestions on how RTD can enhance language accessibility, including:

- Increase bilingual staff and provide better language assistance tools
  - Hiring more bilingual bus operators and frontline employees would improve communication and customer confidence
  - Providing staff with real-time translation tools, such as an app, could enhance service
- Improve translations and signage
  - Address inaccuracies in existing translated materials
  - Expand multilingual signage at stations, on buses, and within trains
  - Introduce Spanish audio announcements and QR codes for instant translations
- Enhance digital and community engagement efforts
  - Expand language options on RTD's website, apps, and text alert systems
  - Utilize video content and multimedia formats for clearer communication
  - Partner with community-based organizations to better engage linguistically diverse customers

Beyond language access, respondents raised three key issues: affordability, security, and cleanliness. Some noted that fares are expensive for them, security concerns on buses and trains, and the need for cleaner transit vehicles and facilities. These concerns highlight that improving accessibility for linguistically diverse communities goes beyond language — it requires addressing broader challenges that affect all customers. In sum, the survey results reinforce the importance of RTD's language access initiatives while underscoring areas for further improvement. By expanding bilingual staffing, improving translated materials, enhancing digital tools, and addressing broader transit concerns, RTD could better serve its diverse ridership and advance equitable mobility for all.



# RTD 2025-2028 Language Access Plan

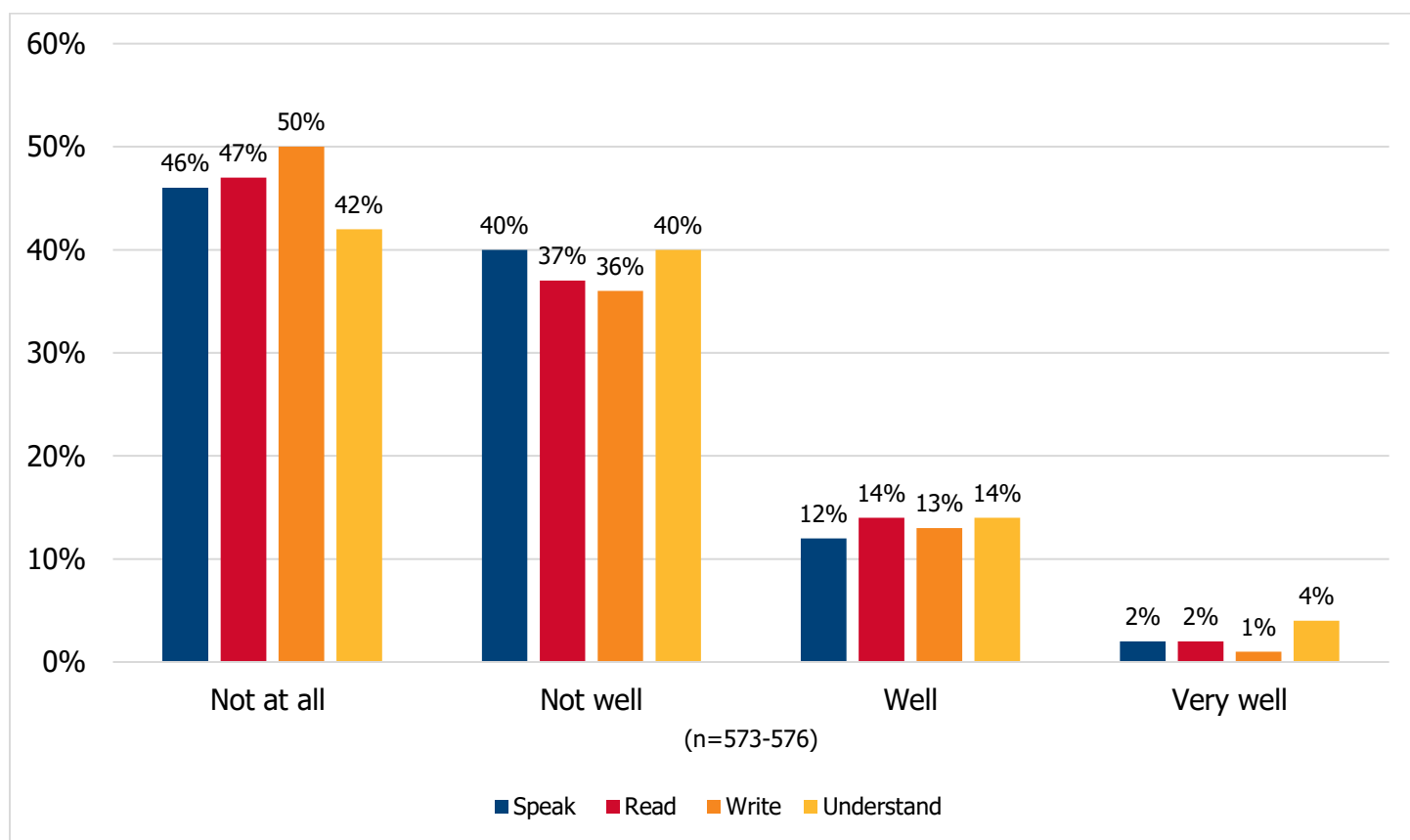
## Results

### Respondent Characteristics

All survey respondents are considered limited English proficient, indicating at least one area of English proficiency — whether speaking, reading, writing, or understanding — that they do not do “very well,” as illustrated in Figure 3.2. Compared to the 2021 survey, respondents to the 2024-2025 survey are far more likely to indicate that they do not speak, read, write, or understand English at all (in 2021, 13%, 14%, and 14%, respectively for reading, writing, and understanding) or not well (in 2021, 27%, 34%, and 26%, respectively).<sup>24</sup>

In fact, most respondents to the 2021 survey indicated they could read, write, or understand English well or very well — contrary to the 2024-2025 survey, where very few do so (less than 20% across all categories). These results illustrate that the Transit Equity Office improved its ability to distribute the survey to an audience where language barriers are truly significant.

*Figure 3.2. Respondents’ Ability to Read, Speak, Write, or Understand English*



As shown in Figure 3.3, the languages that survey respondents speak vary widely, expanding beyond the survey translation offerings that TEO made available. The most commonly preferred language is Spanish (73%) followed by Chinese (18%). English was included in the results only if a respondent selected English in addition to another preferred language.

<sup>24</sup>The 2021 survey did not capture data on respondents’ ability to speak English.

# RTD 2025-2028 Language Access Plan

Given that US Census data indicates that 66% of the population that speaks languages other than English is Spanish speakers and the remaining 34% speak a variety of other languages, these results are fairly proportionally similar.

*Figure 3.3. Respondents' Preferred Languages (Select All)*

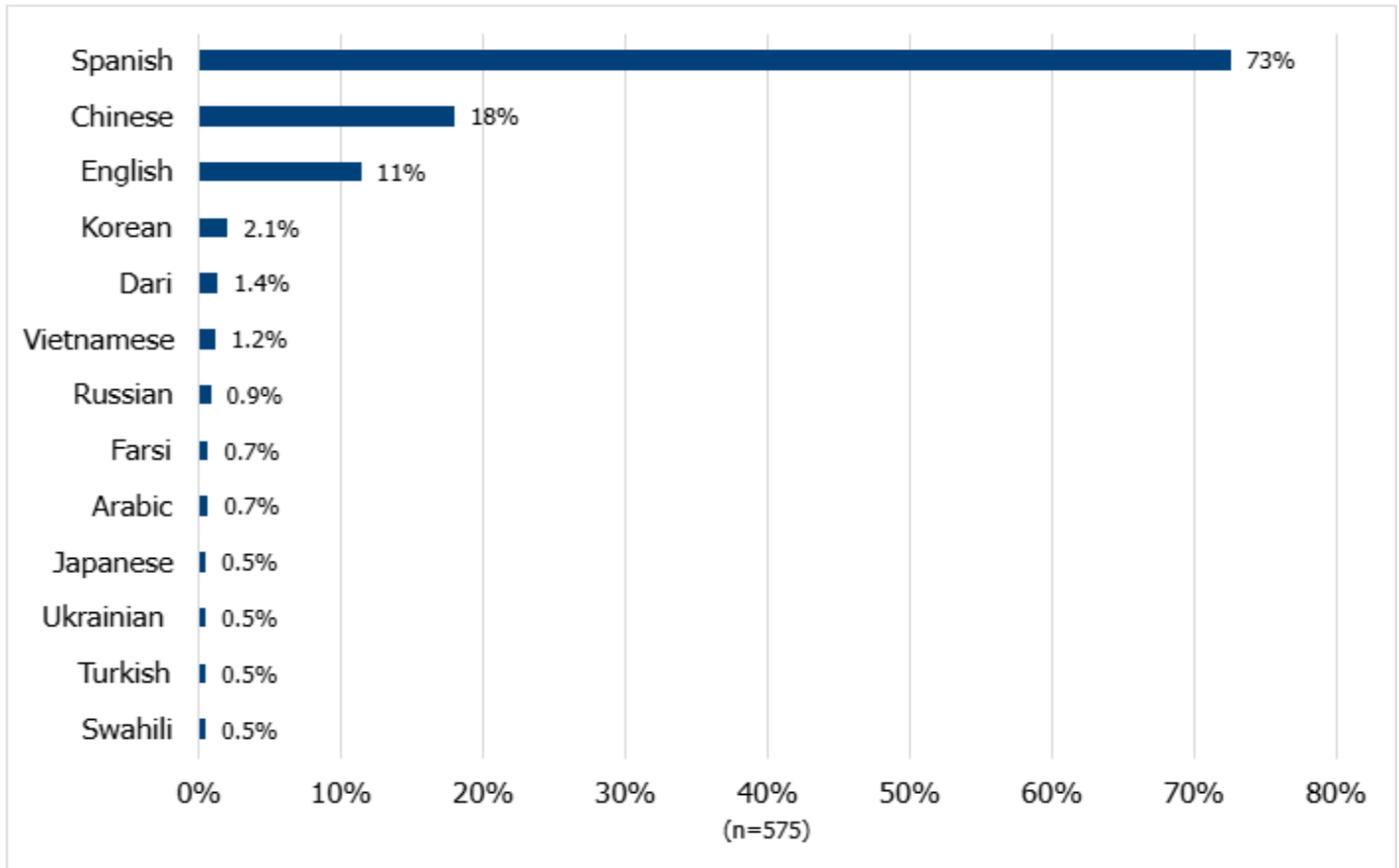


Figure 3.4 is a complete list of the respondents' 23 preferred languages, including write-in responses.

*Figure 3.4. Complete List of Respondents' Preferred Languages*

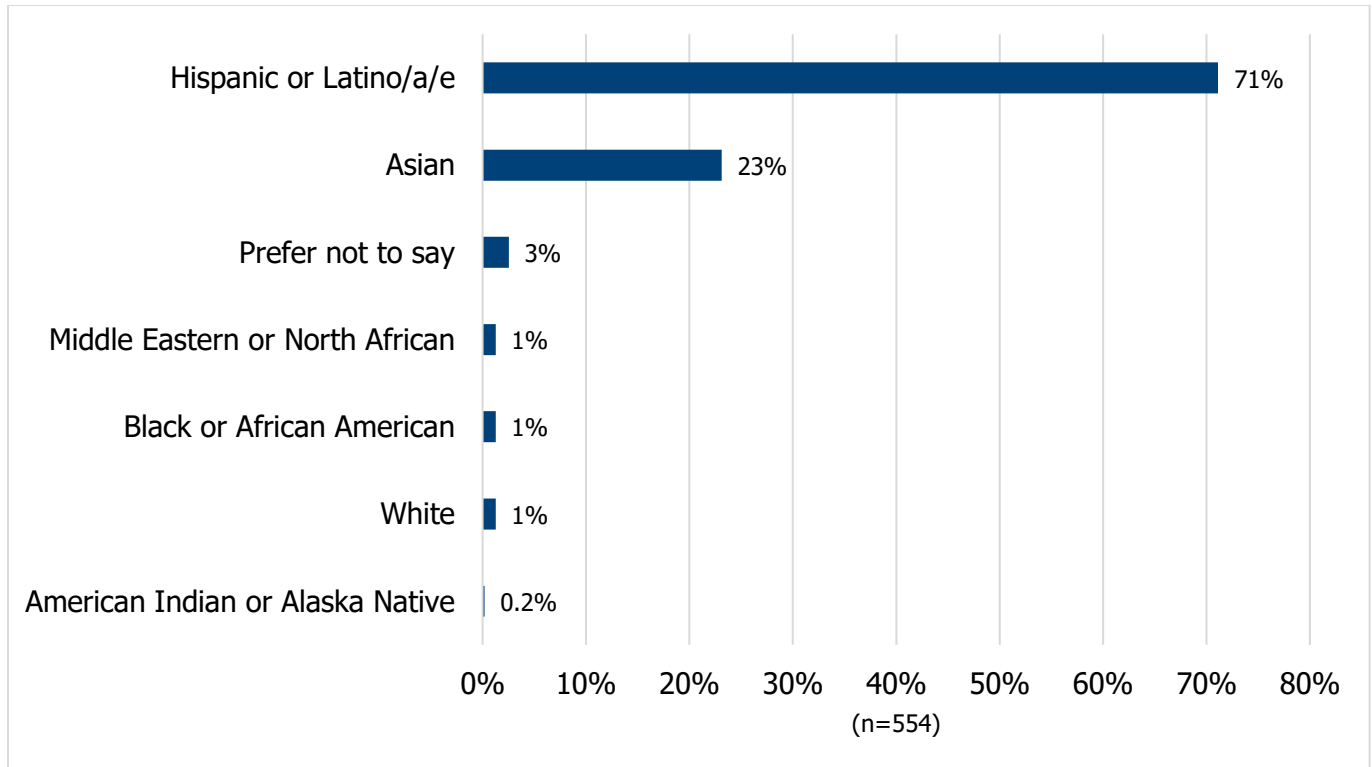
Preferred Language	Response Count
Spanish	419
Chinese	104
English	66
Korean	12
Dari	8
Vietnamese	7
Russia	5
Arabic	4
Farsi	4
Swahili	3
Turkish	3
Ukrainian	3

Preferred Language	Response Count
Japanese	3
French	2
Burmese	2
Haitian Creole	1
Indonesian	1
Karen	1
Kinyarwanda	1
Kirundik	1
Somali	1
Tagalog	1
Amharic	1

# RTD 2025-2028 Language Access Plan

In addition to mostly speaking Spanish, Figure 3.5 shows how the majority of respondents (71%) claim Hispanic or Latine racial or ethnic origins, with Asian being the second most commonly cited origin (23%).

*Figure 3.5. Respondents' Racial or Ethnic Origins*



Further, survey respondents mostly identify as female (63%) and between the ages of 25 and 54 years old (please see Figures 3.6 and 3.7, respectively, for gender and age).

Taken together, these characteristics indicate that the average survey respondent is a middle-aged Latina woman.

# RTD 2025-2028 Language Access Plan

Figure 3.6. Respondents' Gender Identity

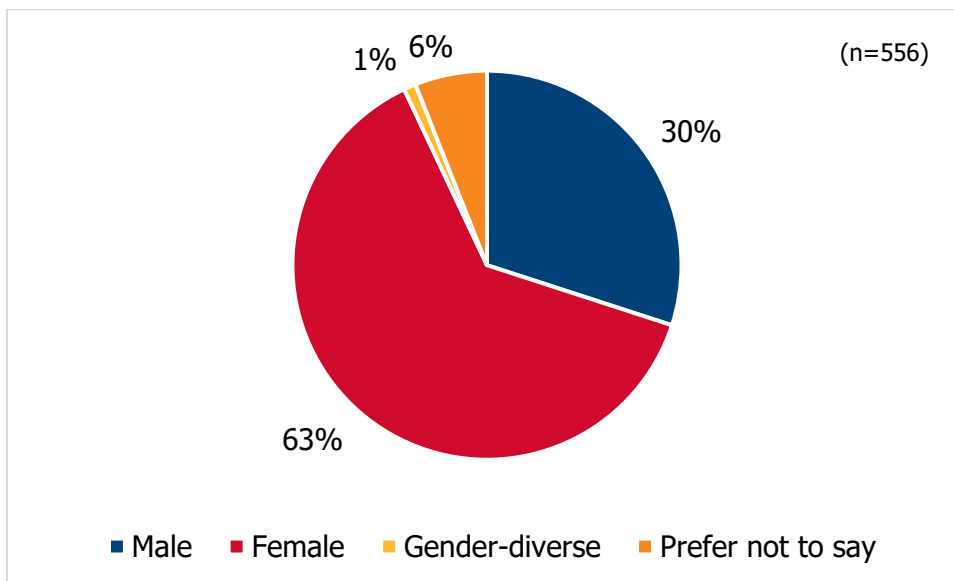
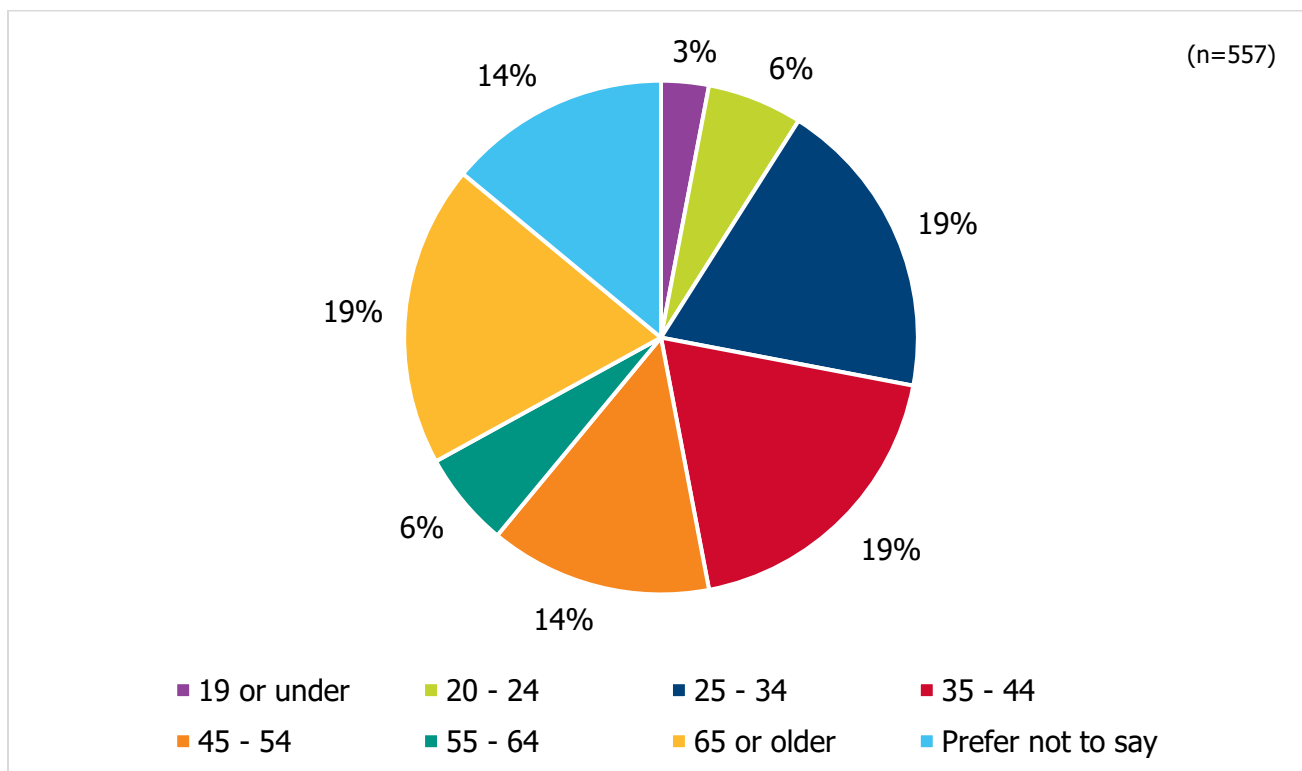


Figure 3.7. Respondents' Age

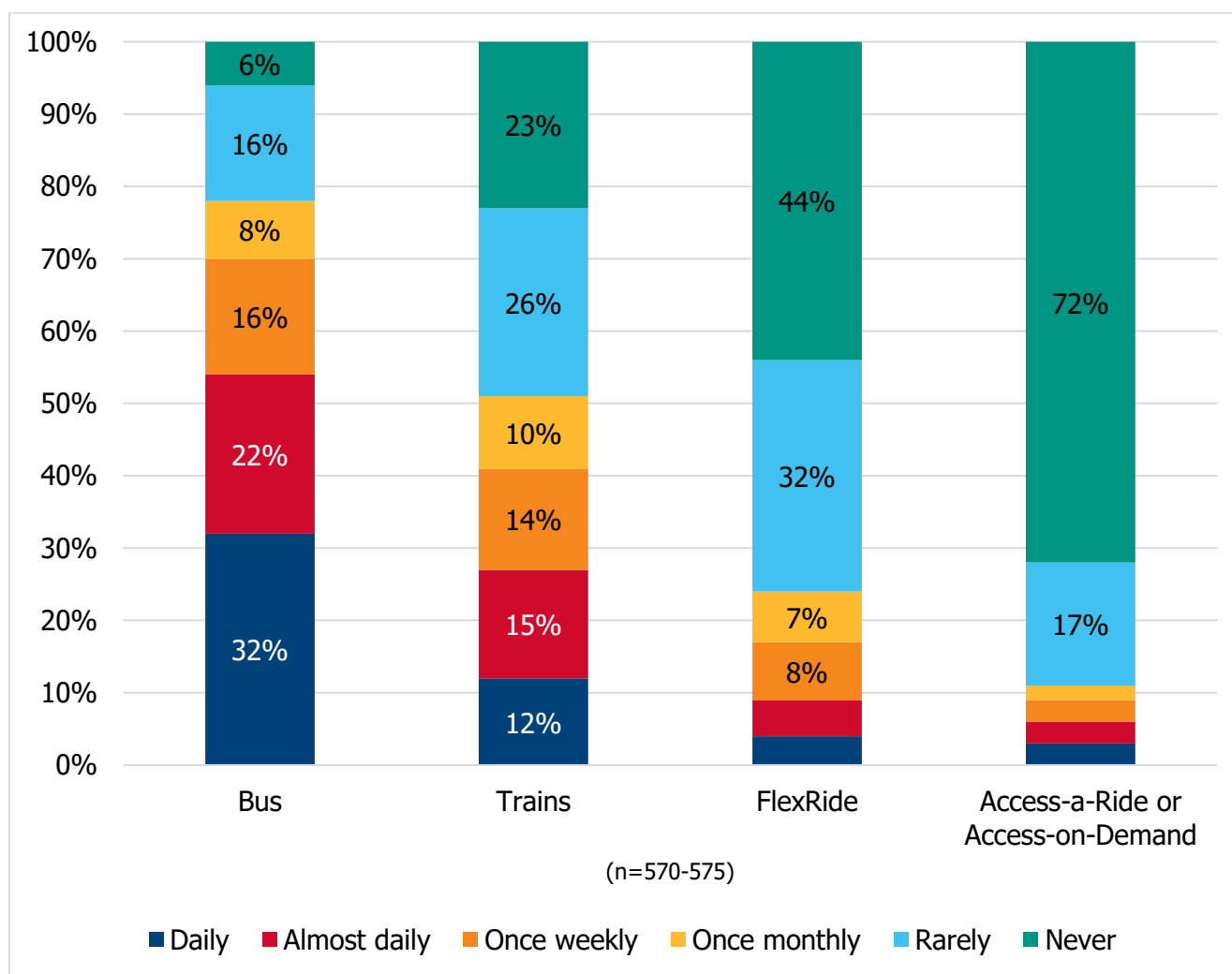


# RTD 2025-2028 Language Access Plan

## Transit Usage, Barriers to Mobility, and Mobility Behaviors

Respondents more frequently use RTD buses than trains or RTD's demand-response services, FlexRide and Access-a-Ride/Access-on-Demand.<sup>25</sup> Specifically, 70% ride a bus once weekly or more, where 41% ride the train once weekly or more. The vast majority of respondents rarely or never use FlexRide and Access-a-Ride/Access-on-Demand (76% and 89%, respectively). This is likely because most survey respondents' may not be traveling in FlexRide service areas nor be eligible to use Access-a-Ride services.

Figure 3.8. Frequency of Transit Usage by Mode<sup>26</sup>



When asked what prevents them from using RTD's public transit services more frequently, a slim majority (51%) say nothing (i.e., they use RTD as much as they need). However, almost one-third (29%) of respondents state that language barriers prevent them from using agency services more. Other reasons unrelated to language

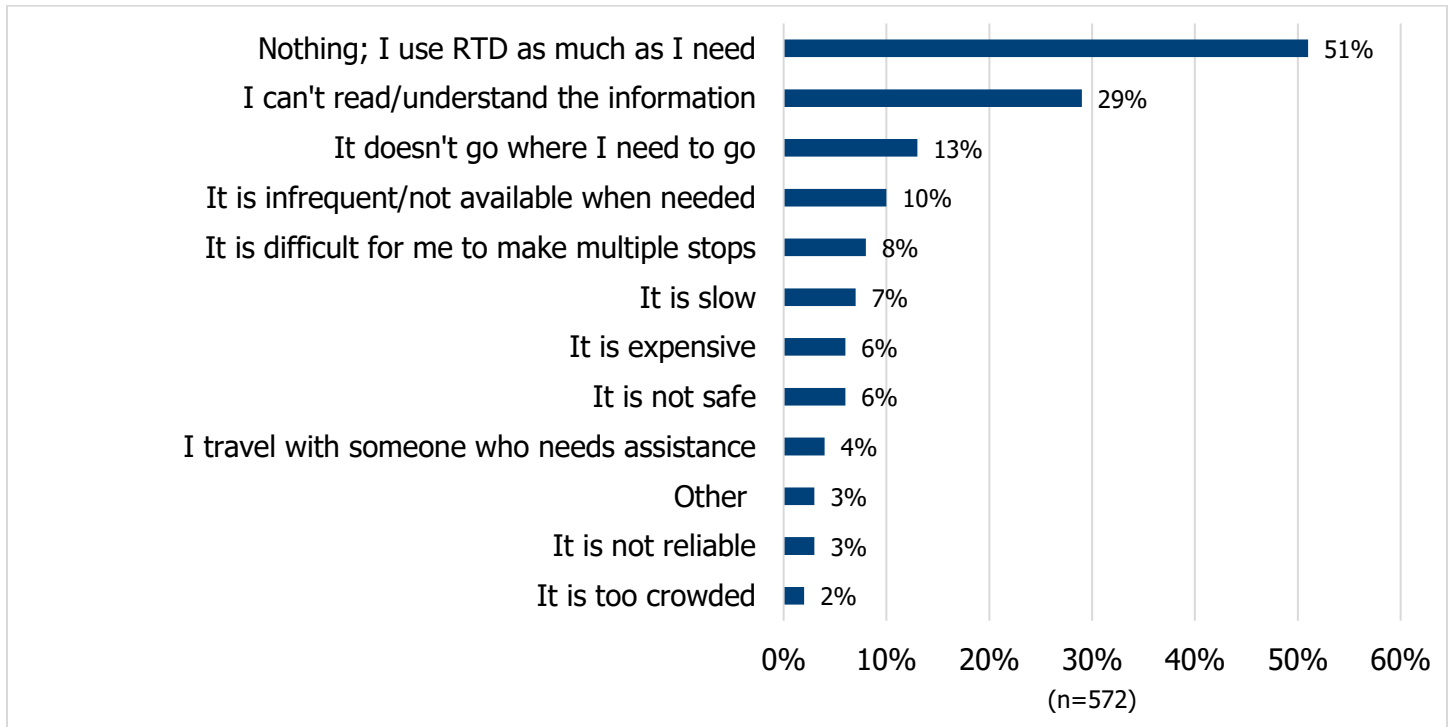
<sup>25</sup> [FlexRide](#) provides extended bus service in specific Denver metro areas, connecting customers to RTD Park-n-Rides and stations, medical centers, and business parks. [Access-a-Ride](#) is RTD's ADA complimentary paratransit service, and [Access-on-Demand](#) is RTD's premium supplemental paratransit subsidized curb-to-curb service using taxi and ride share providers. Individuals with current certification for Access-a-Ride are eligible to use Access-on-Demand.

<sup>26</sup> Stacked charts with results equal to or less than 5% will not have an accompanying data label due to space constraints.

# RTD 2025-2028 Language Access Plan

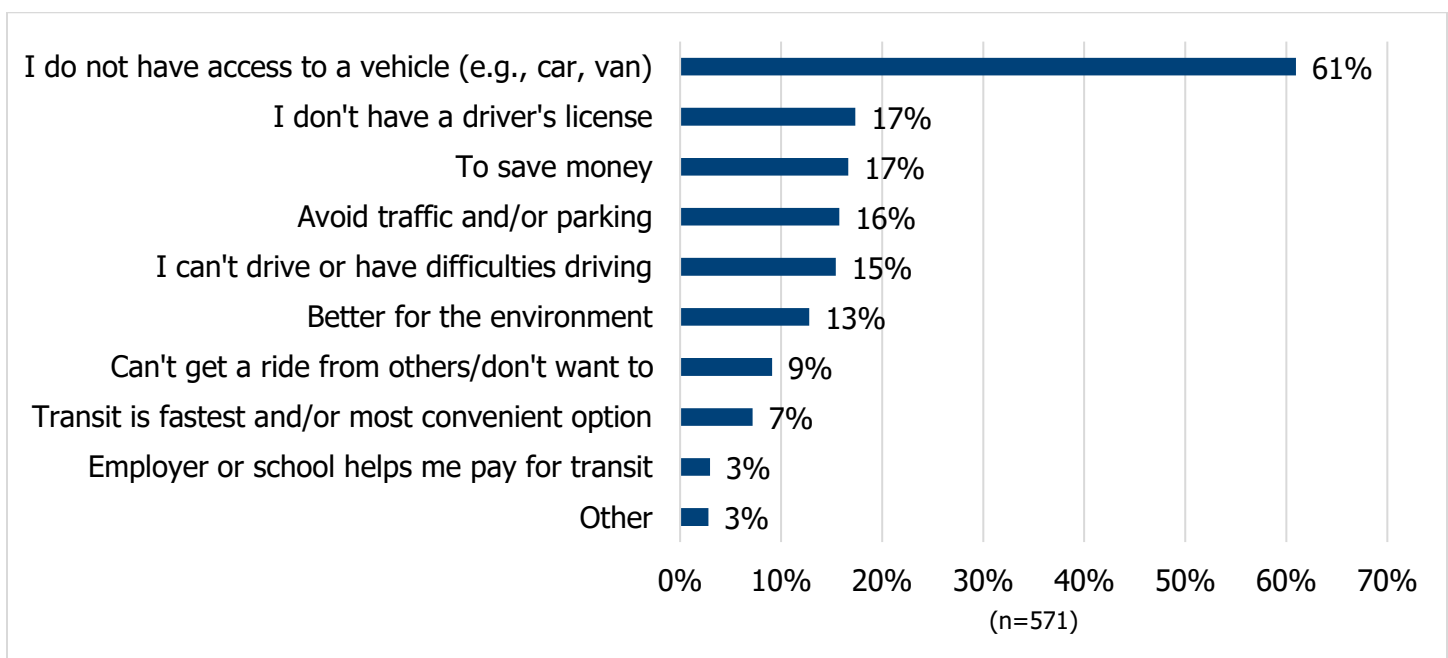
barriers, such as lack of service availability (13%) and infrequency of service/service span (10%), also prevent more frequent usage, as shown in Figure 3.9.

*Figure 3.9. Barriers to Using RTD's Services*



As for why respondents use RTD services (Figure 3.10), the most common reasons are that they do not have access to a vehicle (61%), do not have a driver's license (17%), and to save money (17%).

*Figure 3.10. Reasons for Using RTD's Services*

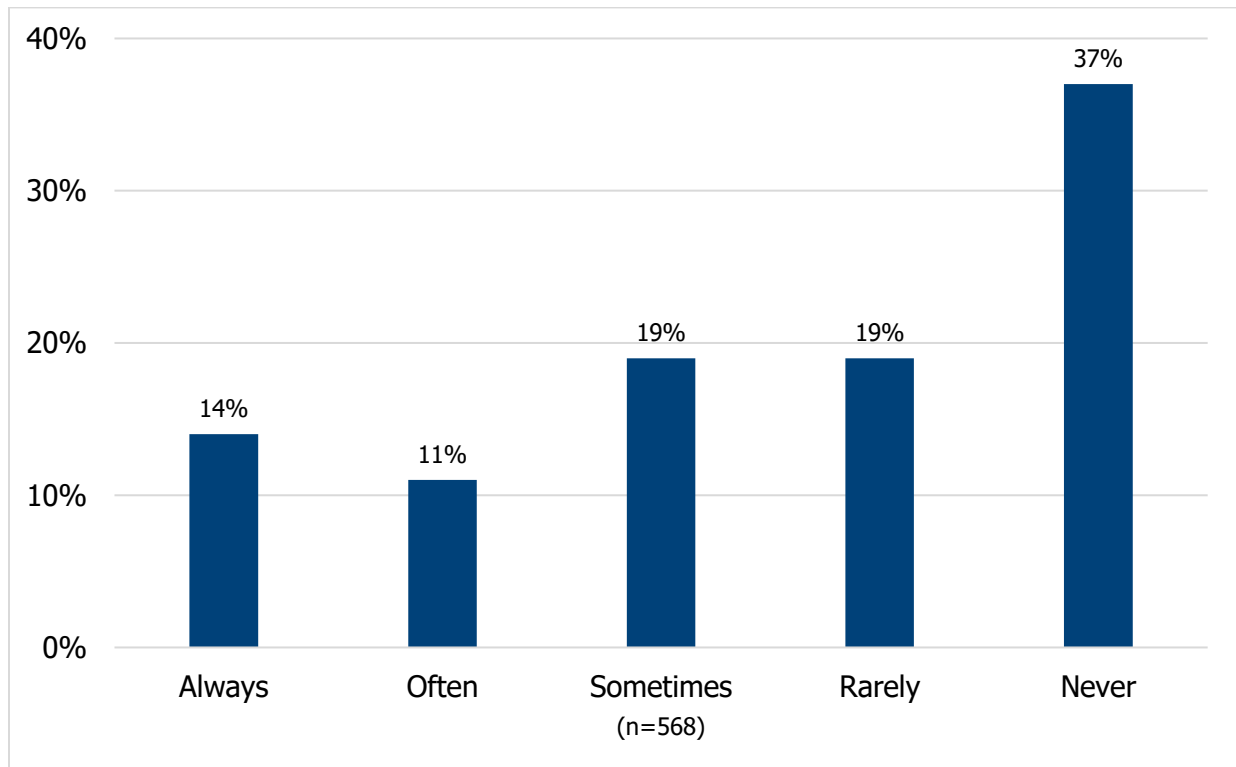




# RTD 2025-2028 Language Access Plan

In a follow-up question on household vehicle access (Figure 3.11), 56% confirm that they rarely (19%) or never (37%) have access to a household vehicle for their personal transportation needs, indicating a high level of transit reliance. This is in contrast to the 2021 survey, where 65% noted that they had a household vehicle available.

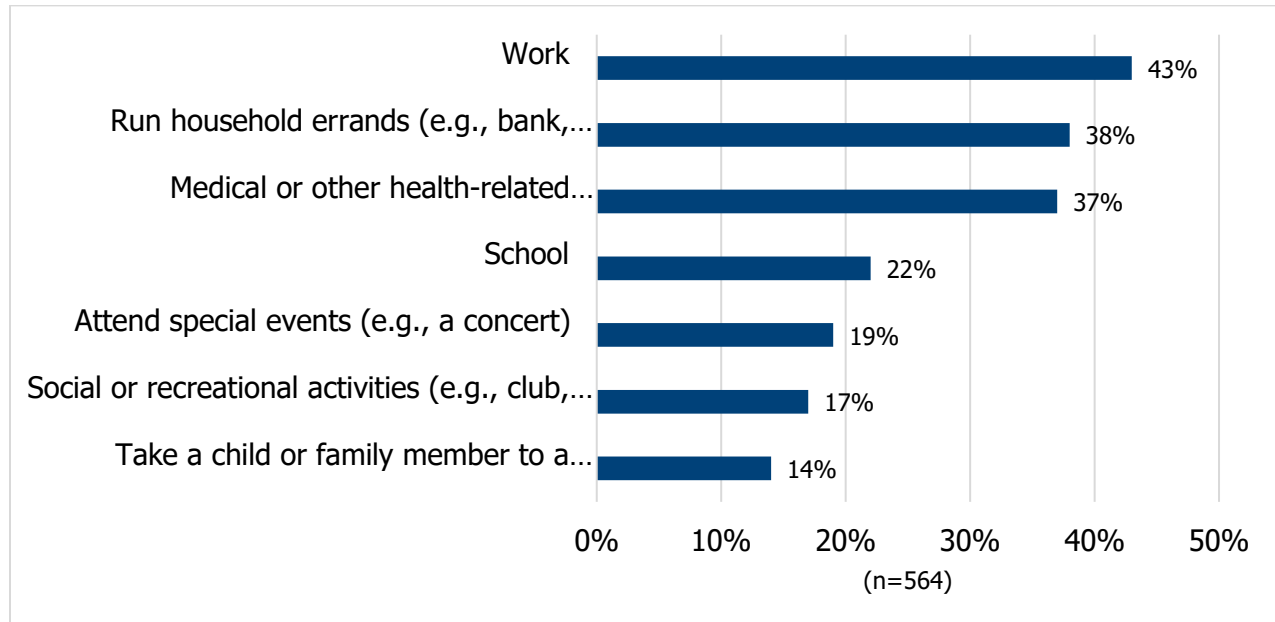
*Figure 3.11. Availability of Household Vehicle for Personal Transportation*



Where are respondents going when using RTD services? Figure 3.12 illustrates that destinations are diverse, including work (43%), running errands (38%), and health appointments (37%).

# RTD 2025-2028 Language Access Plan

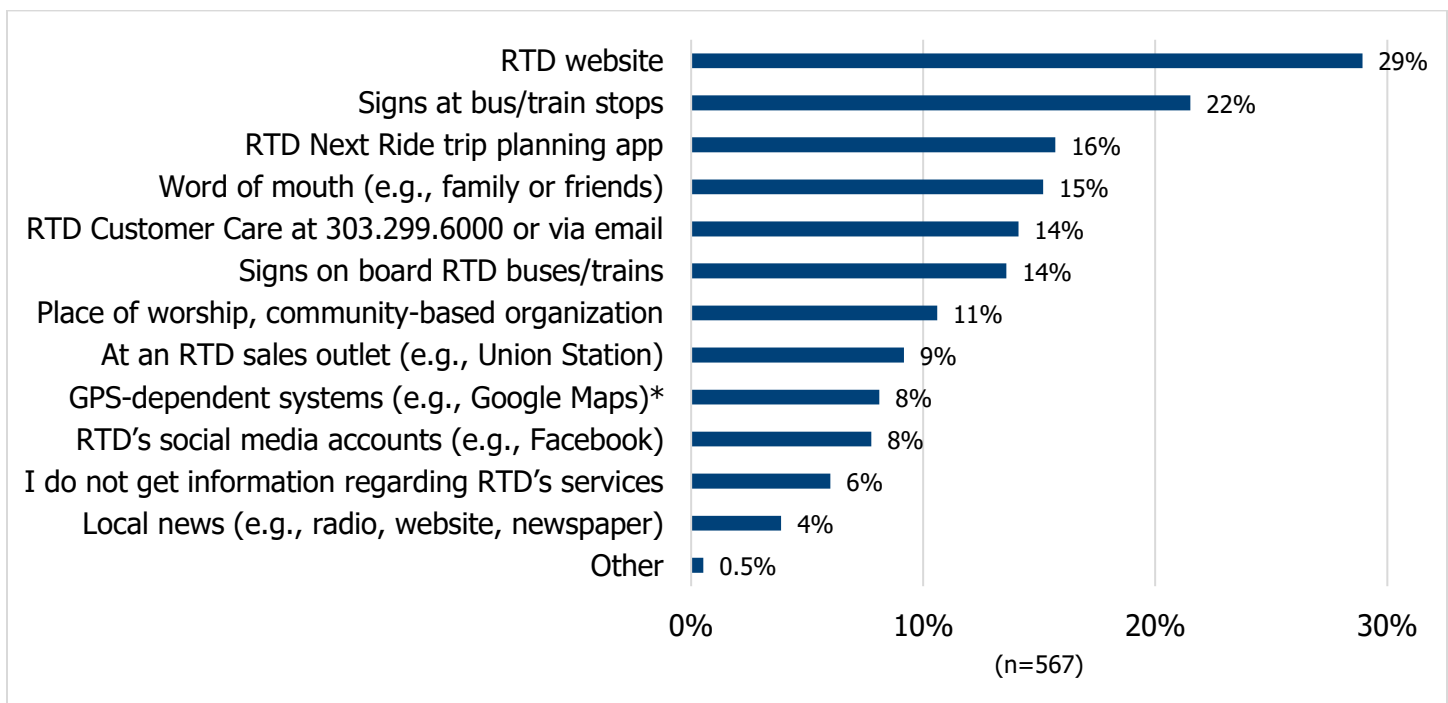
Figure 3.12. Destinations Using RTD Services



## Respondents' Use and Perception of RTD Information

Survey respondents use a variety of ways to get information about RTD services, with the most popular being the RTD website (29%), signs at bus/train stops (22%), and the RTD Next Ride app (16%) as shown in Figure 3.13. Though the survey did not include "GPS-dependent systems" such as Google Maps or Apple Maps as an option, it was a frequent write-in response, with 8% of respondents mentioning it. Other write-in responses included the organizations that may have distributed this survey, such as CREA Results, Montbello Organizing Committee, and the Denver Regional Council of Governments (DRCOG).

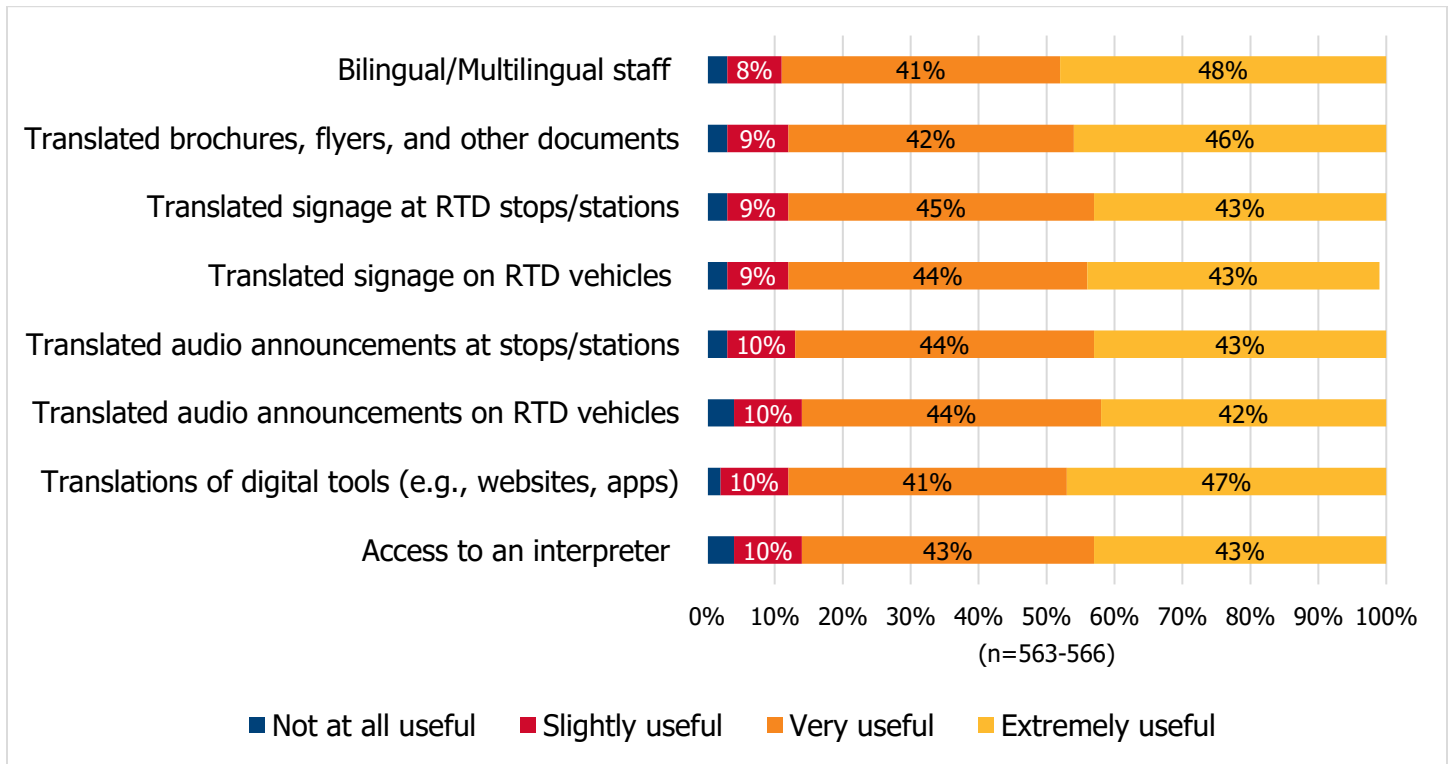
Figure 3.13. Ways that Respondents Receive RTD Information



# RTD 2025-2028 Language Access Plan

To improve access to RTD information, the survey asked respondents how useful they think certain language assistance services would be (Figure 3.14). Respondents overwhelmingly think that all language assistance services listed, from translated signage to having more multilingual staff, are very useful or extremely useful (86-89%).

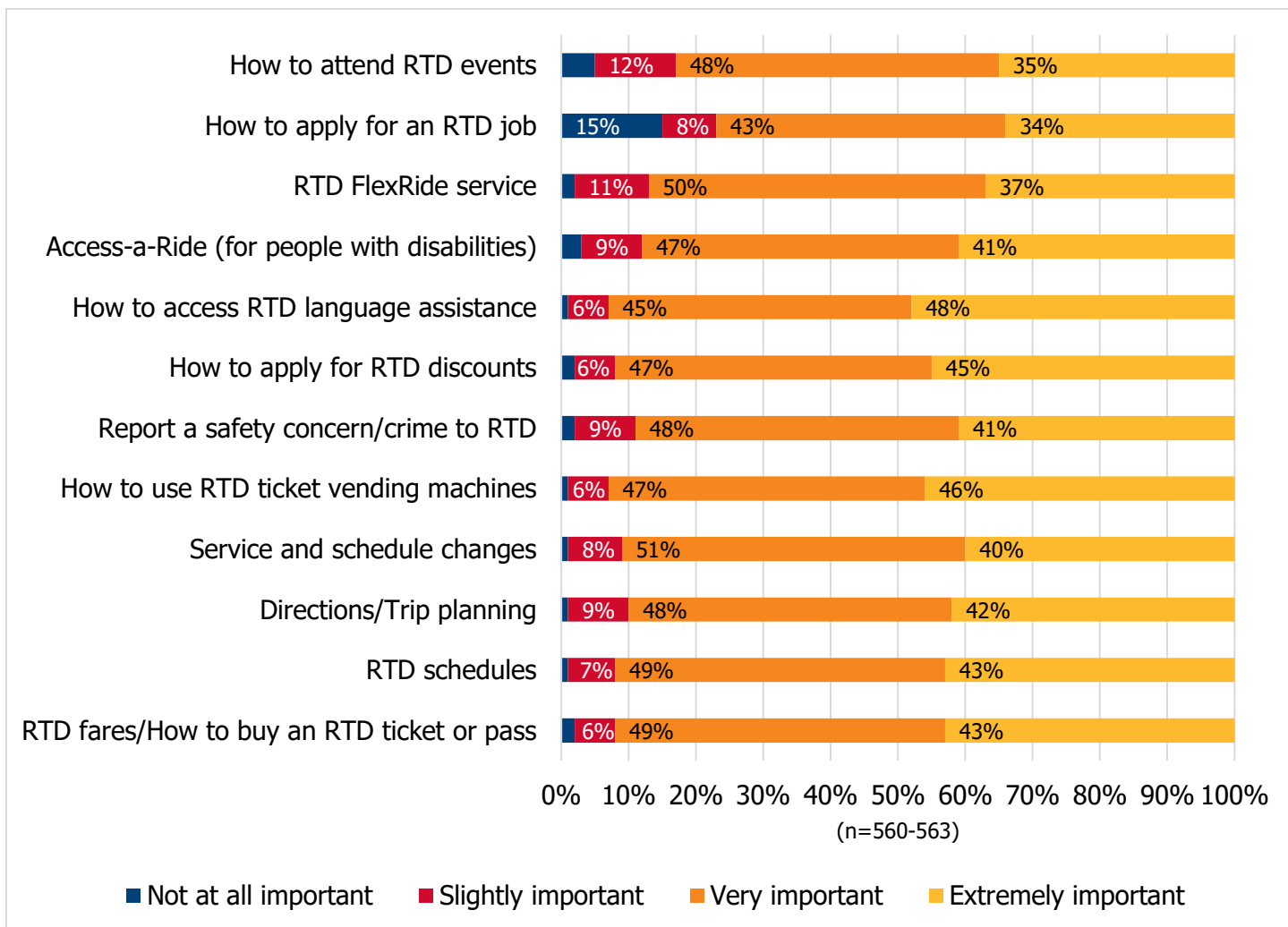
Figure 3.14. Usefulness of Language Assistance Services



Similarly, respondents find it very important or extremely important to get information in their preferred language(s) across RTD topic areas included in the survey, from directions and trip planning to how to apply for discounts — though “how to attend RTD events” and “how to apply for an RTD job” were slightly less important informational topic areas to translate (Figure 3.15). “How to access language assistance” is, perhaps unsurprisingly, the most “extremely important” (48%) information to translate in respondents’ languages.

# RTD 2025-2028 Language Access Plan

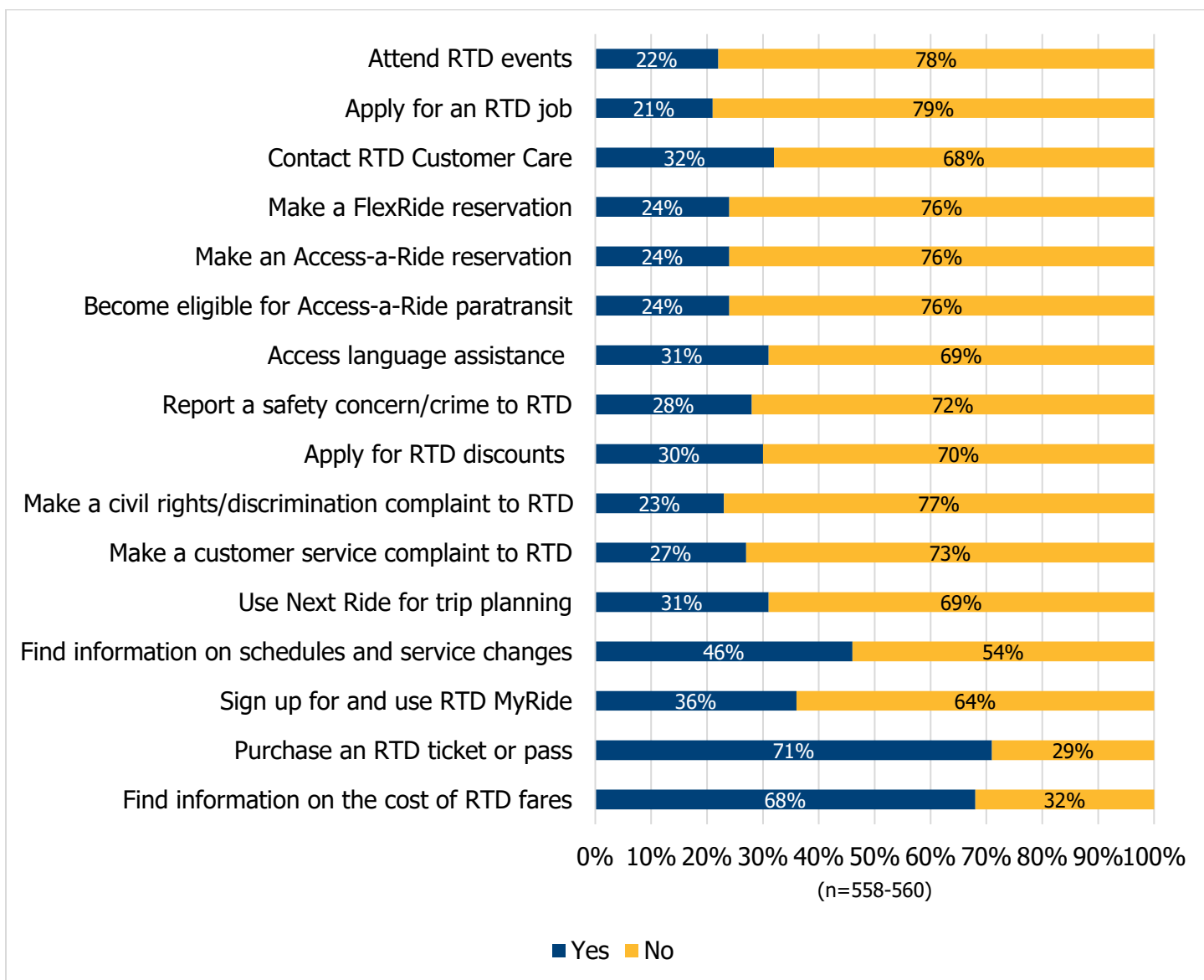
Figure 3.15. Importance of Translations in Respondents' Language(s) by Topic Area



At the same time that respondents find it very or extremely important to have all inquired information translated in their preferred languages, they also report not knowing how to do the most common activities associated with these topic areas. Alarming, the majority of respondents only reported knowing how to find information on the cost of RTD fares (68%) and purchasing an RTD ticket or pass (71%). Otherwise, the majority — and in most cases, the vast majority — do not know how to sign up for and use MyRide (64%); find information on schedule and service changes (54%); use Next Ride for trip planning (69%); make a customer service complaint to RTD (73%); make a civil rights/discrimination complaint to RTD (77%); apply for discounts (70%); report a safety concern/crime to RTD (72%); access language assistance (69%); become eligible for Access-a-Ride, make an Access-a-Ride reservation, or make a FlexRide reservation (76%); contact RTD Customer Care (68%); apply for an RTD job (79%); and attend RTD events (78%).

# RTD 2025-2028 Language Access Plan

Figure 3.16. Respondents' Knowledge on How to Access RTD Information and Services



## Suggestions for Improving Language Accessibility

The end of the language access survey provided respondents the opportunity to write suggestions to improve the language accessibility of RTD's services and programs. The responses highlight several key areas where RTD can improve language accessibility.

### Bilingual Staff, Customer Service, and In-Person Engagement

A recurring theme in the feedback is the need for more bilingual English/Spanish staff, particularly bus operators and frontline employees. Many respondents expressed frustration with the lack of Spanish-speaking operators and suggested that hiring bilingual operators would significantly improve communication and the overall transit experience. Some also recommended providing RTD staff with translation apps or other real-time interpretation tools to assist linguistically diverse people.

Customer service and respectful treatment from staff were also key themes in the feedback. Some customers reported feeling dismissed or disrespected by operators who appear impatient with customers who don't speak

# RTD 2025-2028 Language Access Plan

English. A few respondents noted that they experienced bias or negative treatment based on their language or ethnicity. This suggests a need to bolster cultural competency, general customer service, and effective cross-cultural communications skills to foster a more welcoming and inclusive transit environment.

In addition to improving communication and customer service, respondents — especially Chinese-speaking respondents — expressed a desire for greater outreach to immigrant and non-English-speaking communities. Some, particularly elderly customers, expressed appreciation for the translations that RTD has already implemented but wished for more direct engagement. Suggestions included hosting informational sessions and even organizing cultural events to build stronger connections with diverse groups.

## Enhanced Communication Tools: Improved Quality Control, Expanded Digital and Multimedia Communication

Another recurring concern is the quality and availability of translated information. Several respondents noted that existing Spanish translations, particularly those that appear to be machine-generated, can be inaccurate or difficult to understand. Customers suggested improving the clarity and accuracy of translated materials, including signs, announcements, and printed guides, and making them more visible at stations, on buses, and inside trains. Some respondents also recommended recording audio announcements in different languages and placing QR codes on signage that passengers can scan to access information in their preferred language.

Some participants emphasized the importance of digital and multimedia communication. A customer suggested that RTD create more video content to explain transit services in different languages. Others highlighted the need for better-translated content on RTD's website and mobile applications to ensure that linguistically diverse people can easily access essential transit information. Social media was also mentioned as a potential tool for outreach, with a respondent recommending that RTD collaborate with community leaders to disseminate important updates in multiple languages.

Finally, technology and real-time communication tools emerged as another area for improvement. Some customers suggested that RTD integrate more languages into its mobile applications and ticketing systems to make transit more user-friendly. Others emphasized the importance of using digital tools, such as text message alerts in multiple languages, to provide updates and important information.

*Figure 3.17. Write-in Suggestions on Improving RTD's Language Accessibility*

Spanish Original	English Translation
Con el crecimiento de la población latina, sería beneficioso. Hacer procesos en multimedia. Daria dinamismo y haría que la información llegue mejor. Y pues no sé cómo solicitar empleo en RTD pero me gustaría trabajar allí con ustedes. Videos — medias no convencionales.	With the growth of the Latino population, it would be beneficial to do multimedia processes. It would give dynamism and make the information arrive better. And well, I don't know how to apply for a job at RTD, but I would like to work there with you. Videos - non-conventional media.
Con personas bilingües	With bilingual people
Conductores bilingües	Bilingual drivers
Conductores bilingües sería perfecto	Bilingual drivers would be perfect
Contar con personal bilingüe	Have bilingual staff
Emplear a conductores bilingües.	Employ bilingual drivers.
Enviar más notificaciones	Send more notifications
Es necesario que algunos conductores muestren respeto por los usuarios generalmente siempre están muy apesurados y de mal humor	It is necessary that some drivers show respect for the passengers, they are generally always in a hurry and in a bad mood
Español	Spanish
Falta avisos en idioma español en los buses	There is a lack of signs in Spanish on the buses



# RTD 2025-2028 Language Access Plan

Falta información que se entienda en español, porque al traducirlo en Google traslate sale otra información	There is a lack of information that is understood in Spanish, because when translating it on Google, other information comes out
Genie do equidad de lenguaje, los conductores solo lo ven Latino a uno y lo ven feo.	Genie of language equity, the drivers only see you as Latin and they see you in a bad way.
Grabar los audios en varios idiomas, traducir los avisos y textos y colocar un código QR que podamos escanear y seleccionar el idioma para tener fácil acceso a la información, en lo personal estoy aprendiendo inglés muchas veces me toca usar el traductor, pero cuando llego a un sitio y veo cosas en mi idioma eso me hace sentir muy feliz y tomada en cuenta. Gracias	Record the audios in several languages, translate the signs and texts and place a QR code that we can scan and select the language to have easy access to the information, personally I am learning English, many times I have to use the translator but when I get to a place and see things in my language that makes me feel very happy and taken into account. Thank you
Hablar español y mejor trato ah las personas no importan como se vean	Speak Spanish and treat people better no matter what they look like
Hacer las traducciones al español mejorar la gramática y la ortografía tanto en audio como impreso	Make the translations into Spanish improve the grammar and spelling both in audio and in print
Indicaciones de recorrido y paradas	Directions of route and stops
Instrucciones en otros idiomas	Instructions in other languages
Interpretación	Interpretation
Interpretación	Interpretation
Intérprete, más guías	Interpreter, more guides
La información en español	The information in Spanish
La verdad utilizo mucho el bus. pero a veces no entiendo muchas cosas. Hablo solo español. se me dificulta la comunicación. Sería bueno encontrar conductores que hablen español. Gracias	The truth is that I use the bus a lot. But sometimes I don't understand many things... I only speak Spanish... I have a hard time communicating. It would be good to find drivers who speak Spanish. Thank you
Los anuncios más visibles	More visible ads
Los conductores Sean más empáticos y respeto ante todo.	Drivers should be more empathetic and respectful above all.
Más respeto de los conductores.	More respect from drivers.
Mayor limpieza en las instalaciones de RTD, además de ayuda de un intérprete, ya que muchos conductores pierden la paciencia con la persona que por motivos personales o generales no lo es posible comunicarse en inglés.	More cleaning in RTD facilities, in addition to help from an interpreter, since many drivers lose patience with the person who for personal or general reasons is not able to communicate in English.
Me gusta que la mayoría de los avisos están traducidos. Lo malo es que nunca hay conductores que hablan español. Seria super que fueran bilingües.	I like that most of the ads are translated. The bad thing is that there are never drivers who speak Spanish. It would be great if they were bilingual.
Podrían poner en español o traducir para facilitar	Could you put it in Spanish or translate it to make it easier?
Poner los letreros importantes español	Put up important signs in Spanish
Mas educacion para Los conductors	More education for drivers
Proporcionar a los conductores una app que permita comunicarse en otros idiomas con los usuarios	Provide drivers with an app that allows them to communicate with users in other languages
Que incluyan más anuncios en español y choferes que de igual manera sean bilingües	That they include more announcements in Spanish and drivers who are also bilingual
Que se alguien pueda hablar español	That someone can speak Spanish
Que se encuentre información su cada estación, volvantes o letreros grandes	That one can find information at each station, buses or large signs

# RTD 2025-2028 Language Access Plan

RESPECTO DE LOS CONDUCTORES.HACIA LOS PASAJEROS.	RESPECT OF THE DRIVERS TOWARDS THE PASSENGERS.
Tener tecnología necesaria para comunicarse mejor	Have technology to communicate better
Tengan en cuenta un poco más el idioma en español	Take into account a little more the Spanish language
Teniendo programas de traducción para las personas que no hablan inglés	Having translation programs for people who do not speak English
Usar el Facebook contactar líderes de la comunidad para dar información de RTD	Use Facebook to contact community leaders to give information about RTD
yo quisiera que fueran más personas como bilingües	I wish there were more bilingual people
Las personas que verifican los tickets en los trenes deberían hablar al menos 3 idiomas o 2 para guiar a diferentes personas.	People who check tickets on trains should speak at least 3 languages or 2 to guide different people.

Chinese Original	English Translation
给老年人（低收入的办理免费的）乘车卡。	To provide Bus Passes to the elderly (and free of charge ones for those on low incomes).
能用手机翻译	I hope the translation will be available on mobile phones.
有更多的中文服务，尤其是网页上的中文。	More services in Chinese, especially website content.
最好每个中国节日都会有活动！因为我们这些老人时间不多了！谢谢！	Would like to have some activities or events on every Chinese traditional holiday! There are not too many days left for us old folks! Thanks!
能经常与我们公寓老人多多联系，多多互动，介绍RTD一系列服务和计划	Get in touch with the old folks in our place more often; have more interaction with us; tell us more about the services and programs RTD offers.
能否增加中文普通话语言普及。	To offer more services in Mandarin Chinese.

Farsi Original	English Translation
اگر معلومات به زبان های هر و بیشتر ایرید بسیار خوب بود	If information were available in more languages, it would be very good.
بیشتر های است	More are needed.

Korean Original	English Translation
번역된 안내 책자, 방송	Translated guidebook and broadcast
앱을 사용하여 안내하기	Guide using an app
티켓 구매방법을 자세히 번역해주는 것이 편리하겠습니다	It would be helpful if you could provide a detailed translation of the ticket purchase process.

Swahili Original	English Translation
Kwa kutuma ujumbe kutumia simu kwaluga ninayoifahamu	By sending a message to my phone in a language I understand.

## Suggestions for Improvement: Affordability, Security, and Cleanliness

Aside from suggestions related to language access, respondents emphasized three other key concerns: affordability, security, and cleanliness (both environmental and the cleanliness of vehicles). While some may consider these issues off-topic, they are included here to highlight that improving accessibility for linguistically

# RTD 2025-2028 Language Access Plan

diverse communities is not just about language — it also means addressing broader concerns that affect all customers, regardless of their preferred language.

*Figure 3.18. Write-in Suggestions on Improving RTD's Services (Other)*

Spanish Original	English Translation
Camiones ecológicos y menos agresivos al medio ambiente para ayudar a detener un poco el cambio climático	Eco-friendly trucks that are less aggressive to the environment to help stop climate change a little
El costo poco menos por personas del diario se transportan, que en vacaciones sea gratis para las familias	The cost per person is a little less than the daily transportation, that on vacations it is free for families
En cuestión personal me gustaría que bajaran un poco la tarifa diaria comparado con Chicago el pase diario está a 5 dólares y en Denver a 10 dólares	Personally, I would like them to lower the daily rate a little compared to Chicago, the daily pass is 5 dollars and in Denver it is 10 dollars
Esta caro en rutas cortas, bajar los precios tarda 45 mins en pasar	It is expensive on short routes, lowering the prices takes 45 minutes to arrive
Deben de hacer rutinas para tener más seguridad en los camiones y en el tren he viajado varias veces y hay homeless que dan miedo porque no hay quien cheque nada y eso no está bien por seguridad de todos	They should create routines to have more security on the buses and on the train. I have traveled several times and there are homeless people who are scary because there is no one to check anything and that is not right for everyone's safety
La seguridad en las paradas de tren o por lo menos permitir ventas o microempresarios para que hagan cubículos pequeños y vendan cómo en Chicago, y así ayudar a la economía también	Security at the train stops or at least allow sales or micro entrepreneurs to make small cubicles and sell like in Chicago, and thus help the economy as well
Me gustaría más seguridad	I would like more security
Muy importante al igual que asegurar la seguridad dentro del bus	Very important as well as ensuring safety on the bus
Tener seguridad en el autobús	Have security on the bus
Que los buses se mantengan más limpios y que no se atrasen tanto	That the buses are kept cleaner and that they don't delay so much
Que estén en mejores condiciones las paradas donde esperamos	That the stops where we wait are in better condition
Mayor limpieza en las instalaciones de RTD	More cleaning in RTD facilities
Me gustaría que estuvieran más limpios	I would like them to be cleaner
Mas limpio	Cleaner
Tener más signos en español y que no esté sucio	Have more signs in Spanish and that it is not dirty

## Discussion

One of the most striking findings is that compared to the 2021 survey, the 2024-2025 respondents reported much lower levels of English proficiency. This shift suggests that RTD's outreach efforts have been more effective in reaching individuals who face substantial language barriers by building more relationships with community-based organizations that serve newcomers and linguistically diverse people as well as contracting with community partners to support this work. Many of these respondents likely have limited access to English-language education, work in industries where English proficiency is not required, or are recent newcomers who have yet to develop fluency. As a result, their transit experience is heavily impacted by the availability — or lack — of language assistance services. The fact that a majority of respondents lack access to a household vehicle (61%) further underscores their reliance on transit and the urgency of improving accessibility for this population.

# RTD 2025-2028 Language Access Plan

Language barriers were a major reason why nearly one-third (29%) of respondents do not use RTD services more frequently. This indicates that even though RTD provides language assistance, these efforts may not be sufficient to overcome the challenges faced by non-English-speaking customers — or, alternatively, that they are not sufficiently reaching their intended audience. Many respondents reported difficulties in understanding RTD schedules, planning trips, and accessing fare discounts — tasks that are essential for effective transit use. For RTD’s MyRide app, respondents overwhelmingly report not knowing how to use it; this is possibly due to the app being available only in English or, separately, due to technological barriers.

On the other hand, 32% of respondents say they know how to find information on RTD’s fares, compared to 44% in the 2021 survey who reported being unfamiliar with RTD’s fare structure. This improvement may be due to the Systemwide Fare Study and Equity Analysis conducted from 2022 to 2024, which led to the implementation of lower, simpler fares in 2024.

Beyond language-related barriers, respondents also expressed concerns about affordability, security, and cleanliness. Many of these customers are likely from low-income backgrounds, given the overlap between immigration and poverty, making fare costs a major concern. Security issues discourage some from using RTD services more frequently, especially if they feel unsafe due to crime or a lack of visible enforcement. That 72% of respondents do not know how to report a safety or security incident to RTD is particularly alarming given the recent expansion of both the RTD Transit Police Department and the robust marketing campaign for RTD’s Transit Watch, the primary channel for submitting security concerns.<sup>27</sup> Cleanliness concerns, particularly related to buses and stations, may also influence perceptions of RTD’s services and impact overall satisfaction.

To address these challenges, RTD can build on existing initiatives while expanding efforts to improve language accessibility, customer experience, and overall service quality.

1. Expand outreach to linguistically diverse communities
  - Improve communications on RTD services, programs, and language assistance with community partners who serve linguistically diverse people, especially immigrants, asylum seekers, and refugees
  - Attend in-person, hyper-local community meetings, such as town halls, to meet these communities where they are
  - Explore alternative communications channels, such as joining new social media groups and making more video-based content
2. Enhance language assistance services
  - Bilingual staffing: Expand the number of bilingual bus operators and frontline employees to help bridge communication gaps and improve customer confidence
  - Improved translations: Ensure greater accuracy in translated materials, especially key service information, to help customers better understand their transit options
  - Multilingual digital tools: Increase language options on the RTD website, mobile apps, and text alert systems to provide real-time access to critical information
3. Address service barriers
  - Better communication of fare assistance programs: Many respondents may not be aware of available discounts due to language barriers. Clearer, multilingual outreach could improve access to cost-saving programs
  - More frequent and reliable service: While service availability was not the top concern, improving frequency and reliability — particularly in underserved areas — could encourage greater transit use

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<sup>27</sup> It is important to keep in mind, however, that historically underserved communities — especially those that are predominantly Black, Indigenous, and People of Color — may not associate law enforcement with improved security given past harms disproportionately committed against these populations by armed sworn officers.

# RTD 2025-2028 Language Access Plan

## 4. Improve customer experience

- Increased security presence: Enhance safety at stations and on vehicles through more security personnel or surveillance measures to address concerns about crime and customer safety
- Cleanliness initiatives: Examine maintenance and cleaning efforts at stations and on vehicles to improve perceptions of RTD services and contribute to a more welcoming transit environment

By implementing these solutions, RTD can make its services more accessible, welcoming, and effective for linguistically diverse communities. Language accessibility is not just about translating materials — it is about ensuring that all customers, regardless of their English proficiency, can confidently navigate and rely on public transit. Addressing affordability, security, and cleanliness concerns alongside language accessibility will help RTD create a transit system that truly serves all members of the community equitably.

## Focus Group: Interpreter Network by Spring Institute

RTD's Transit Equity Office conducted a focus group in collaboration with the Interpreter Network by the Spring Institute for Intercultural Learning. The purpose of the focus group was to enrich TEO's qualitative understanding of the mobility needs and concerns specific to linguistically diverse immigrant and refugee communities as well as to inform RTD's language access efforts.

### Methodology

The focus group occurred on September 15, 2022, from 5:30 to 7 p.m. online using Microsoft Teams. Participants registered for the focus group on a dedicated Teams registration page, and they received a calendar meeting invite and several reminder emails in the days leading up to the September 15. Participants were all employed as interpreters within the Interpreter Network by Spring Institute at the time of the focus group. While 23 interpreters registered for the focus group, 15 attended (a retention rate of 65%).<sup>28</sup> Focus group participants, as well as the language(s) they speak in addition to English, are as illustrated in Figure 3.19.

Figure 3.19. Focus Group Participants

Participant	Language(s) Spoken
<b>Mahvash Graham</b>	Dari, Farsi
<b>Sally Tebsherani</b>	Arabic
<b>Sonja Lee</b>	Cantonese
<b>Linda De Santiago</b>	Spanish
<b>Jenny Li</b>	Chinese (Mandarin)
<b>Joyce Weti</b>	Swahili, Maragoli
<b>Aziz Vahobov</b>	Tajik, Uzbek, Russian
<b>Hoa-Loan Phan</b>	Vietnamese
<b>Guadalupe Lopez</b>	Spanish
<b>Isaac Amani</b>	Kinyarwanda, Swahili, French
<b>Wajiha Fatime</b>	Dari, Pashto, Farsi, Urdu
<b>Perla Millan-Aguilar</b>	Spanish
<b>Elham Zekri</b>	Dari, Farsi
<b>Nelin Kyaw</b>	Burmese, Malay
<b>Aden Hassan</b>	Somali

<sup>28</sup> Cynthia DeLarber, former Chief Operating Officer of the Spring Institute, also attended. However, she is excluded from the participant count.

# RTD 2025-2028 Language Access Plan

## **Key Findings**

The focus group with interpreters from the Spring Institute provided valuable insights into the mobility needs, barriers, and communication challenges faced by linguistically diverse communities and reinforces the takeaways from the language access survey detailed above. The key findings are as follows:

1. Low transit usage due to structural barriers
  - a. Most participants rely on personal vehicles for work due to time constraints and the need for flexibility
  - b. Transit is seen as too time-consuming, expensive, and inconvenient for multi-stop trips
  - c. Real-time service information is difficult to access, making transit less reliable
2. Language barriers limit access
  - a. Language difficulties create anxiety, particularly for new customers
  - b. Challenges include understanding schedules, remembering stops, and communicating with operators
  - c. The application process for discount programs is inaccessible to many non-English speakers
3. Need for improved digital communications
  - a. RTD's apps are not user-friendly and lack integrated fare purchasing and trip planning
  - b. Multilingual service alerts and instructional videos are essential for better access
  - c. Social media engagement could enhance outreach to diverse communities
4. Demand for in-person language assistance
  - a. Electronic wayfinding maps, translated materials, and multilingual announcements at stations and on vehicles are needed
  - b. Location-based language assistance should reflect community demographics
5. Importance of community partnerships
  - a. Collaboration with resettlement agencies, libraries, and senior centers can improve awareness of transit resources
  - b. Ride-alongs and community-led training sessions could enhance confidence in using public transit
6. Operator communication and cultural training
  - a. Translation devices, community ambassadors, and better promotion of RTD's interpretation services were suggested
  - b. Cross-cultural training for operators would help improve interactions with non-English-speaking customers

## **Results**

The focus group explored three different themes and included one activity, in this order:

- Theme A: Use of the RTD System and Potential Barriers
- Activity: Give Input on a Language Access Icon
- Theme B: Communication Preferences and Access to Information
- Theme C: Exploring Language Assistance Options (Operators)

Each theme contained two or three questions each, with RTD staff asking additional probing questions as needed.

## **Theme A: Use of the RTD System and Potential Barriers**

### **Use of the RTD System**

Overall, focus group participants did not use RTD services frequently and chose to drive personal vehicles for most trips, especially for work. Many stated that this was due to the nature of their positions as interpreters, which requires them to travel to numerous locations in the same day quickly. Participants noted that when they



# RTD 2025-2028 Language Access Plan

do use public transportation, they typically make trips downtown (e.g., Union Station), between college campuses, or to the airport. Reasons given for using public transportation included avoiding parking, traffic, or driving in inclement weather; having the ability to use what would have been driving time for other purposes instead; and good connectivity at Denver Union Station to many areas of interest. Some participants mentioned that they were more frequent RTD customers in the past, particularly when they lacked access to a vehicle or had a consistent destination, such as a college campus.

## Barriers to Using the RTD System

Reasons for not using RTD's transit system more frequently included:

- It's too time-consuming; one participant felt that it sometimes takes 3-4 times longer to make a trip via bus or train than it does to drive
- It's not advantageous for trip-chaining (i.e., making multiple stops in one trip)
- It's expensive, especially for people using Local passes who must ride frequently
- It is not frequent enough; lack of frequency also contributes to the time-consuming nature of transit
- Real-time information is not accessible, especially for detours, cancellations, or other unscheduled service changes; further, participants did not know how to get RTD information generally
- The Denver metro is too sprawled to allow for adequate transit access to destinations

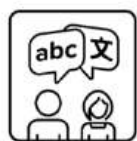
Participants highlighted that language barriers can cause significant fear and intimidation when using RTD's public transit system. One participant shared that her elderly mother, who does not speak English, was reluctant to change her route after moving because she was anxious about navigating a new one. Others noted that the first few experiences using transit can be particularly overwhelming for linguistically diverse people. Other barriers to language access included:

- Purchasing discount passes and submitting the necessary paperwork as part of the application process
- Having to learn how to read a schedule (due to the lack of frequency)
- Remembering where to get on and off the bus due to a lack of information and visual indicators on approaching stops' names
- Telling a bus operator that the customer needs to get off

## Activity: Give Input on a Language Access Icon

After Theme A, the focus group participated in an activity to provide input on the icon they preferred RTD to use to brand its language assistance materials. Figure 3.20 illustrates the options that were provided:

*Figure 3.20. Language Access Icon Options Presented to Focus Group*



**Option 1**



**Option 2**



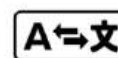
**Option 3**



**Option 4**



**Option 5**



**Option 6**



# RTD 2025-2028 Language Access Plan

In the discussion that followed, participants largely shared their preference for Option 1 and Option 5. Though they seemed less familiar with an icon like Option 1, participants felt that it clearly illustrated elements of discussion and language; they also felt that it was humanizing and welcoming. On the other hand, participants also liked Option 5 because it is very similar to other language access icons that exist across smartphone apps and the internet. Because of this, they felt that linguistically diverse individuals would be most able to identify it and understand its meaning. Participants also commended Options 2 and Options 6 for their simplicity.<sup>29</sup>

## **Theme B: Communication Preferences and Access to Information**

Focus group participants felt there is a lack of sufficient information for them and the linguistically diverse community to use public transportation more comfortably. This included:

- Accessible schedules and route information
- Payment options, ensuring that people know about accepted forms of payment, and payment rules (e.g., providing exact change on buses)
- Improved smartphone app for trip planning that is integrated into the payment app
- Better and more widespread marketing of digital tools such as RTD's smartphone apps so that people know about them
- More Spanish translations of key information

## **Ideas to Improve Communication and Language Access**

Focus group participants provided many interesting ideas for improving RTD's communication generally while also offering recommendations for expanding language access. The ideas can be organized into the following three primary categories.

### *Category 1: Improve Digital Communications*

Focus group participants provided extensive feedback on RTD's digital presence, emphasizing the need for improved smartphone apps, multilingual service alerts, videos, and social media engagement.

#### *Enhancing RTD's Smartphone Apps*

Participants highlighted that immigrant and refugee families, like many other populations, rely heavily on smartphones for transportation needs. They suggested several improvements to RTD's apps, particularly RTD MyRide, which currently functions as a gateway to the website rather than a fully independent mobile app. Key recommendations included:

- Developing a standalone app that does not require linking to RTD's website
- Creating an all-in-one platform integrating fare purchasing, trip planning, and general transit information. Participants found the separation between trip planning and fare payment confusing, making it difficult to determine trip costs
- Adding a chat feature to connect customers with Customer Care for real-time assistance.
- Providing translated versions of RTD's apps and increasing marketing efforts to raise awareness about their availability

#### *Multilingual Service Alerts and Visual Content*

Participants stressed the importance of receiving service updates in their preferred languages. They recommended offering translated service alerts or, at minimum, an option for translation.

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<sup>29</sup> Following the focus group, RTD proceeded with variants of Options 1 and 2 for its language access branding, which can be seen throughout some materials in Appendix E.

# RTD 2025-2028 Language Access Plan

Recognizing that some customers may be illiterate, participants also urged RTD to produce more multilingual instructional videos on how to use the transit system. They noted that even small details — such as where to sit on the bus or how to request a stop — can cause anxiety for new customers. These videos should be developed in collaboration with immigrant and refugee community members to ensure they address real concerns.

## *Leveraging Social Media for Multilingual Engagement*

Participants encouraged RTD to better utilize social media to connect with multilingual and multicultural communities. They emphasized that social media is cost-effective and widely accessible, particularly among Latine, immigrant, and refugee families who frequently use Facebook and Facebook Messenger to stay connected.

Additional recommendations included:

- Creating a social media space where people can ask public transit-related questions, with responses from RTD, community members, or interpreters
- Expanding RTD's presence on platforms popular with diverse communities to enhance accessibility and engagement

## *Category 2: Expand In-Person Language Assistance Resources*

While many suggestions focused on digital communication, participants emphasized the need for alternative methods to accommodate differences in technological access or competence, or situations where a phone is unavailable.

They identified two key areas where in-person communication should be enhanced: bus stops and vehicles. Specific recommendations included:

- Electronic wayfinding maps at stops and stations with translation options
- Translated informational materials (flyers, brochures, and other key documents) available at stops and stations, covering topics like how to use RTD services and access language assistance
- Multilingual auditory announcements at rail stations and on buses
- Comprehensive bus system maps similar to rail maps, integrating both modes to illustrate connectivity, with translations available
- Location-specific language assistance, ensuring translated signage, announcements, and documents reflect the primary languages spoken in each area, based on U.S. Census or other available data

## *Category 3: Secure Strategic Community Partners*

Focus group participants emphasized the need for strategic engagement with community partners to improve language access. Many expressed concerns that RTD does not adequately reach immigrant, refugee, and senior populations.<sup>30</sup>

A key solution is partnering with organizations that already serve these communities, such as senior centers, case managers, resettlement agencies, public libraries, and human service offices, to provide public transportation trainings (e.g., ride-alongs) and information sessions. Specifically, organizations like the International Rescue Committee, Spring Institute, and resettlement agencies were recommended as ideal partners since they engage with immigrants and refugees early in their resettlement process and have established educational programs that could integrate RTD-related information.

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<sup>30</sup> According to a participant, seniors tend to live with others of the same language group. Additionally, data shows that seniors are less comfortable with and use technology less than other age groups, though this is changing over time.

# RTD 2025-2028 Language Access Plan

Additionally, participants stressed the importance of direct collaboration with community members to better understand their needs and shape RTD's equity and language access initiatives accordingly.

## **Theme C: Exploring Language Assistance Options (Operators)**

The focus group concluded with a discussion on improving communication between operators and non-English-speaking customers. Suggested solutions included:

- Installing built-in translation devices on buses
- Hiring community ambassadors to assist customers
- Better promoting RTD's free interpretation and translation services through signage and the RTD app

Additionally, a participant highlighted the importance of cross-cultural training for operators to help them navigate language barriers and cultural differences. This aligned with RTD's Serving Non-English-Speaking Customers training, which RTD first implemented in 2022 and includes a cultural competence component.

## **Discussion**

The focus group findings reinforce the challenges identified in RTD's language access survey, particularly regarding the accessibility of transit information and services for linguistically diverse customers. The focus group echoed the challenge of applying for discount programs identified in the survey, highlighting difficulties navigating fare structures and eligibility requirements due to language barriers.

Additionally, while the survey showed that 68% of respondents knew how to find fare information, the focus group revealed deeper concerns about real-time service updates and trip-planning tools. Participants emphasized the need for an improved RTD app that integrates trip planning and fare payment while offering multilingual support — an issue that aligns with previous survey findings about technological barriers. Fortunately, since this focus group took place, RTD greatly expanded the translation tools on both its website and Next Ride app, with more languages to come shortly. Further, RTD's plan to produce a mobile app that integrates fare payment and trip planning tools into one interface is in alignment with the focus group participants' recommendations.

The discussion also underscores the importance of language assistance resources apart from a mobile phone or computer. While digital tools are critical, many transit users — particularly those in immigrant and refugee communities — may disproportionately rely on the built environment at stops/stations as well as on vehicles and printed materials to navigate the system. The recommendation to install multilingual electronic wayfinding maps and provide translated announcements aligns with broader efforts to improve equity in RTD services.

Finally, both the survey and the focus group highlight the need for stronger community partnerships. Participants pointed to organizations that already serve immigrant and refugee populations as key allies in improving transit access. This supports prior findings that more outreach and education efforts are necessary to ensure linguistically diverse communities feel confident using RTD services.

Together, these findings emphasize that language access in transit is not just about translation but also about building trust, improving communication channels, and ensuring that transit information is available in multiple formats. Addressing these gaps will require a multifaceted approach, combining digital improvements, in-person resources, and deeper community engagement. As RTD continues to advance its language access initiatives, it will be crucial to honor the lived experiences of diverse customers, develop data-driven resources that reflect community needs, and foster intentional, reciprocal partnerships to ensure truly inclusive and effective communication.

# RTD 2025-2028 Language Access Plan

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

### Methodology

To complete Factor 4, the Transit Equity Office (TEO) contacted numerous departments and divisions engaged in language access work — specifically, the Paratransit Services Division; the Communications and Engagement, Transit Police, and Human Resources departments; the Board Office; the Risk Management Division; and other offices in the Civil Rights Division — to report their expenses related to language assistance from June 1, 2022 to March 31, 2025. TEO gathered its own expenses as well, given the outsized role it plays in coordinating and paying for language assistance services across the agency.

### Results

#### Resources

The resources available to RTD staff to provide language assistance have significantly increased from the 2019-2022 period to the 2022-2025 period, as is evidenced in part by the increased costs noted in the following section. For a summary of existing resources, see the Introduction and *Language Access Measures* below.

#### Costs

From June 2022 through March 2025, RTD and its contractors spent an estimated \$309,882 on language assistance services — a 78% increase from the \$176,318 reported for the June 2019-May 2022 time period. Figure 4.1 below details RTD’s language assistance expenses with a brief description and the associated department.

The largest expense in the current period was the cost of contracts with the Transit Equity Office’s multicultural outreach partners, estimated at \$101,442. These expenses supported activities such as survey distribution, focus groups, resource fairs, and digital communications campaigns. Following, the second-largest expense was related to developing the agency’s inaugural Serving Non-English-Speaking Customers training, estimated at \$62,099 to hire an instructional designer and purchase access to training development tools like Articulate 360.

Expenses do not include printing with the exception of the “Transit Equity Office Signage and Materials” category. Additionally, costs do not include staff labor.

*Figure 4.1. Costs of Providing Language Assistance: June 2022-March 2025*

Description of Item	Associated Department	Cost
LanguageLink Telephonic Interpretation	Agency-wide	\$1,321
CART Transcript (Spanish Generation)	Board Office	\$761
Interpretation for Board-Related Meetings	Board Office	\$1,360
Multicultural Outreach Partner Contracts	Civil Rights	\$101,442
Video Production and Translation	Civil Rights	\$20,650
Transit Equity Office Signage and Materials	Civil Rights	\$4,541
Training Development	Civil Rights	\$62,099
Interpretation for Events and Meetings	Civil Rights	\$1,400
Event Outreach	Civil Rights	\$3,310

# RTD 2025-2028 Language Access Plan

Language Access Survey Administration	Civil Rights	\$8,968
Translation of Written Materials	Civil Rights	\$7,811
Website Translations (DeepL and Google)	Communications (Digital)	\$5,966
LiVE Income-Based Discount Program Videos	Communications (Market Development)	\$19,240
Translation Links (Spanish Materials Translation)	Communications (Marketing)	\$9,298
MTM Assessment Center	Paratransit	\$8,900
Transdev Call Center Telephonic Interpretation	Paratransit	\$4,873
Medi-Trans Inc, The Rock, United Language Interpretation and Translation	Risk Management	\$25,293
Language Line Telephonic Interpretation	Transit Police	\$4,124
Transit Watch Spanish Mobile Application	Transit Police	\$18,525
<b>TOTAL</b>	<b>All Departments</b>	<b>\$309,882</b>

## Discussion

Though some of the spending on language assistance services likely reflects improved accounting across the agency, the expansion of RTD’s language access efforts is the primary reason for cost increases during this period. For example, RTD has made significant strides in providing digital forms of language assistance, such as the buildout of the website’s translation tool, launch of the Transit Watch mobile application in Spanish, and video production. Most notable, however, is RTD’s commitment in connecting with linguistically diverse communities through paid partnerships with community-based organizations. All in all, RTD has demonstrated its dedication to language access since June 2022 directly through its financial investment, and this investment has allowed us to improve engagement with linguistically diverse communities, expand translated resources, support staff in overcoming language barriers, and beyond.

Finally, it is also crucial to recognize how staff contribute to RTD’s language accessibility in ways not captured by this Factor 4 report. As mentioned in Factor 2, 30% of RTD’s customer-facing staff speak a language in addition to English — providing (often daily) language assistance to linguistically diverse customers. Additionally, staff across departments — including Civil Rights, Operations, and Communications — play a vital role in coordinating and implementing language access initiatives. Although not reflected in financial reports, these contributions are fundamental to RTD’s language access efforts.

## Language Access Measures




RTD’s Four Factor Analysis provides a data-driven foundation for understanding the language needs of the communities the agency serves. Data includes the number of linguistically diverse people in the agency’s service areas as well as the most common languages they speak, the frequency with which linguistically diverse persons interact with RTD frontline staff, the suggestions staff have to overcome language barriers with customers, the nature and importance of RTD’s services to the linguistically diverse population, and, finally, the costs to pursue various language assistance measures. Based on this analysis, RTD is committed to implementing targeted strategies that enhance language accessibility across agency programs and services. In the coming years, RTD will build on existing efforts by enhancing partnerships with community-based organizations, expanding and better promoting language assistance services, streamlining the integration of language access processes into operations, and finding new ways to support frontline staff in serving linguistically diverse customers.

# RTD 2025-2028 Language Access Plan

## Language Access Progress Made from 2022 to 2025

While not comprehensive, the list illustrated in Figure 5 summarizes some of RTD’s accomplishments in improving agency language access from 2022 to 2025.

Figure 5. Summary of 2022-2025 Language Access Accomplishments<sup>31</sup>

 <b>Translation of Vital Materials</b>	<ul style="list-style-type: none"><li>✓ Conducted inventory of vital documents for translation needs</li><li>✓ Translated Title VI materials (<a href="#">complaint procedures</a> in 21 safe harbor languages, public notice in four languages, full <a href="#">Title VI Program</a> in Spanish)</li><li>✓ Translated How to Ride Guide into 26 languages</li><li>✓ Translated How to Ride video into Vietnamese and Simplified Chinese; quality-checked Spanish version (available on RTD’s <a href="#">YouTube</a> or <a href="#">website</a>)</li><li>✓ Prioritized language access in the <a href="#">Systemwide Fare Study and Equity Analysis</a>, with materials in 21 languages and bilingual website</li><li>✓ Translated LiVE income-based discount program materials into 9 languages</li><li>✓ Released <a href="#">Next Ride trip planning app</a> in five languages (Spanish, Simplified Chinese, Vietnamese, Russian, and Korean), with more to follow</li><li>✓ Released <a href="#">Transit Watch app</a> in Spanish</li><li>✓ Established built-in <a href="#">website</a> translation tool in five languages, with more to come</li></ul>
 <b>In-Person and Telephonic Interpretation</b>	<ul style="list-style-type: none"><li>✓ Established process for providing interpretation services upon request</li><li>✓ Provided interpreters at community engagement events (e.g., service council meetings, program webinars)</li><li>✓ Provided Access-a-Ride eligibility coordinators with telephonic interpretation access</li><li>✓ Increased usage of telephonic interpretation services (from one call in 2022 to 142 calls in 2024, in languages from French to Kinyarwanda)</li></ul>
 <b>Community Engagement and Outreach</b>	<ul style="list-style-type: none"><li>✓ Conducted focus group with Spring Institute for Intercultural Learning to understand barriers for linguistically diverse communities</li><li>✓ Expanded outreach to Latine/Hispanic communities through partnerships with Cultivando, Una Mano Una Esperanza, Mi Casa Resource Center and CREA Results</li><li>✓ Expanded outreach to multilingual, immigrant, and refugee organizations, including African Community Center, Servicios de la Raza, and more</li><li>✓ Participated in travel trainings, resource fairs, job fairs, and presentations for diverse communities</li></ul>

<sup>31</sup> Please see Appendix E for examples of the various assets described in Figure 5. Additionally, please refer to Appendix F for usage metrics on RTD’s website and Next Ride translation tools as well as Appendix G for a copy of RTD’s Serving Non-English-Speaking Customers training slide deck.



# RTD 2025-2028 Language Access Plan



## Internal Capacity and Resources

- ✓ Established Serving Non-English-Speaking Customers training for frontline staff
- ✓ Created [Language Access Program webpage](#) for customers to request translations and access telephonic interpretation
- ✓ Added language assistance resources to RTD's internal Transit Equity Office Hub for staff
- ✓ Developed language access icon with community input to brand program and signal language assistance availability
- ✓ Created "I Speak" Language ID cards for frontline staff and piloted pocket-sized versions for Transit Police
- ✓ Installed bus interior cards and rail decals in English, Spanish, Vietnamese, and Simplified Chinese with telephonic interpretation information

While some of these accomplishments were one-time occurrences, the general activities themselves — such as translating vital materials, providing telephonic and in-person interpretation, expanding engagement with linguistically diverse communities, and producing staff resources — will continue into the future.

## Activities to Continue

The following is a general description of activities RTD will carry over from its 2022-2025 Language Access Plan:

- Providing telephonic interpretation via Customer Care at 303.299.6000 and via the Access-a-Ride Call Center at 303.292.6560, including bilingual English-Spanish information specialists
- Providing the RTD website and Next Ride app in RTD's top five safe harbor languages
- Advertising the availability of language assistance for community meetings and events as well as service alerts
- Determining which RTD materials meet the definition of "vital materials" and translating accordingly, including signage
- Providing a Spanish-language interface on Ticket Vending Machines
- Continuing building and maintaining relationships with local newcomer communities in a culturally competent way
- Attending and tabling at cultural events to experience local traditions, connect with community and learn about different cultures
- Continuing building out an internal network of multilingual individuals who can help review translated materials
- Monitoring language access activities on a continual basis
- Developing resources for frontline staff that they have identified may be useful in bridging language barriers with customers
- Continuously scrutinizing system for opportunities to add notification of language assistance
- Sharing (and translating) important RTD information with multilingual, multicultural outlets
- Delivering Serving Non-English-Speaking Customers training to frontline staff

## Translation of Vital Materials

Undoubtedly, translating written materials is a fundamental method of providing language assistance. Accordingly, 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 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 a person if the information in question is not accurate or timely. For instance, applications



# RTD 2025-2028 Language Access Plan

for a bicycle safety course would not generally be considered vital, although summaries of service changes (e.g, modifications to bus and rail services) are vital documents.

RTD refers to “vital documents” as “vital materials” recognizing that not all essential information comes in the form of a document. The Transit Equity Office has established a tiered classification system to identify vital materials, and it includes four classifications:

- Tier 1 — Safety, Security and Civil Rights
- Tier 2 — Information Critical to Access RTD’s Services
- Tier 3 — Information to Empower Customers
- Tier 4 — Entertainment

These tiers are described below.

## ***Tier 1: Safety, Security and Civil Rights***

Tier 1 materials protect customers’ physical safety and facilitates RTD customers exercising their civil rights protected by laws such as the Civil Rights Act of 1964 and the Americans with Disabilities Act (ADA) of 1990. While Tier 1 materials can be digital in nature, much of RTD’s Tier 1 information can be found in printed signage across the transit system (including in vehicles). Examples include (but are not limited to) the Title VI public notice, Transit Watch signage, and ADA decals. Information about public meetings and engagement opportunities related to fare changes and service changes are also Tier 1 materials.

## ***Tier 2: Information Critical to Access RTD’s Services***

Tier 2 materials may be critical to accessing, or facilitates customers’ understanding of and participation in, RTD services and programs. Tier 2 examples include basic customer information (e.g., the website), fare payment information, program applications and information (e.g., for Access-A-Ride, Special Discount Fares or Programs), maps, service changes, and service alerts (e.g., Next Ride). Customer surveys and details about public hearings and engagement opportunities related to Tier 2 information are also Tier 2 materials.

Unlike Tier 1, Tier 2 information is more likely to be digital or both digital and print in nature.

## ***Tier 3: Information to Empower Customers***

Tier 3 materials help customers understand and participate with RTD at a higher level, empowering them to play a larger role in long-term service decisions. Tier 3 examples include project updates and planning information. Customer surveys related to Tier 3 information are also Tier 3 materials.

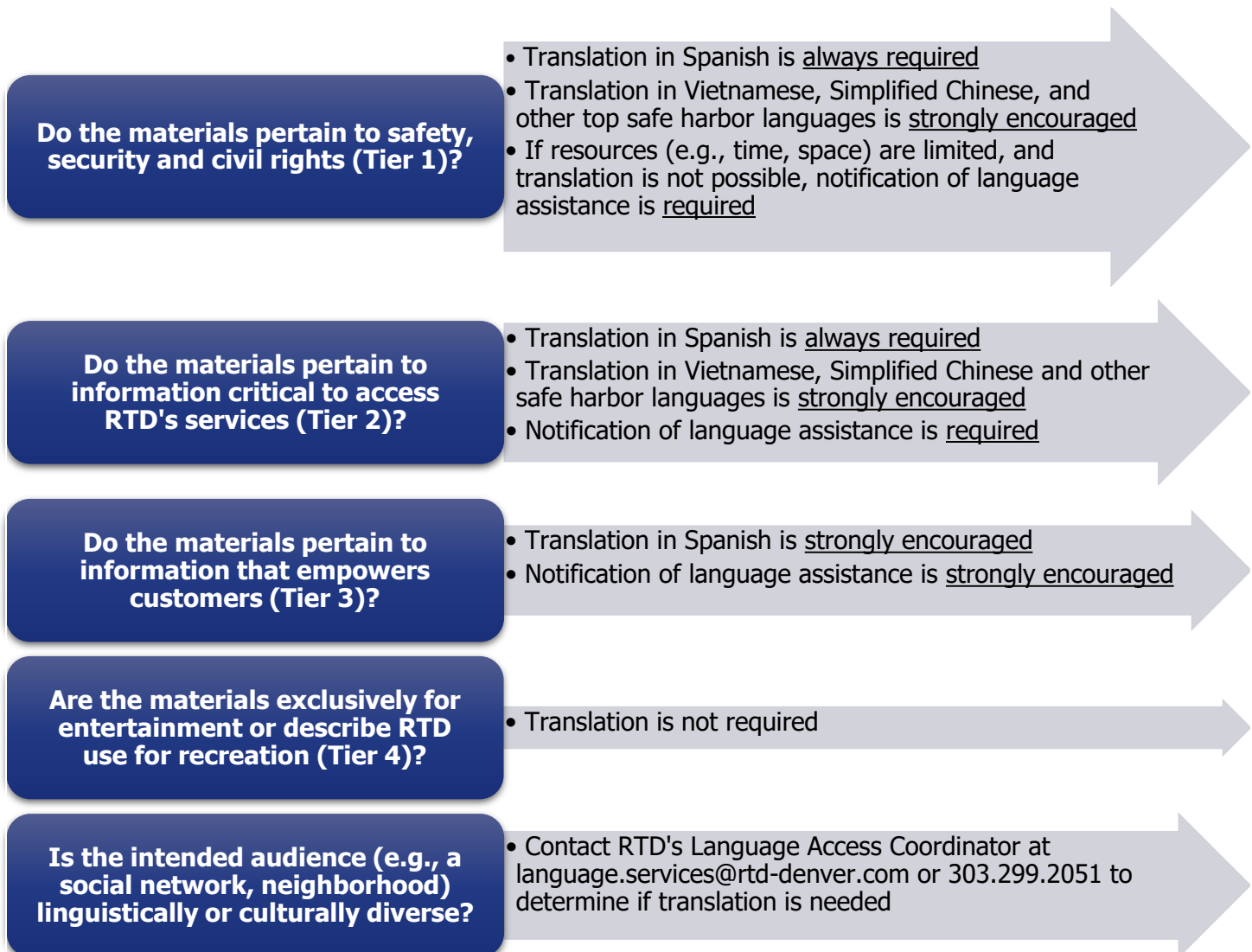
## ***Tier 4: Entertainment***

Tier 4 materials are solely for entertainment or describe how to use RTD for recreational activities. They do not present information directly related to safety, security, or civil rights; improving access to services; or empowering customers to participate in RTD service and planning decisions. Tier 4 materials are usually digital.

Once RTD classifies the material, the agency takes the following general approach to translation. Note, however, that the formatting of a material – for example, whether static signage or digital – may impact the ability to offer translations, thus requiring modified tactics. Digital and print assets, as opposed to materials like signage in stations, are easier to translate in many languages.

# RTD 2025-2028 Language Access Plan

Figure 6. A Flowchart Illustrating How RTD Approaches Translation Using the Vital Material Classification System



## New Language Access Activities: Implementation Calendar

In addition to the language assistance activities RTD will continue noted above, agency staff have outlined 23 new tasks that align with the needs and suggestions identified in the Four Factor Analysis across customers and frontline staff. They can be organized into four general categories or "outcomes": update and monitor the LAP, strengthen and standardize language access processes, expand and promote language assistance services, and enhance employee training and resources to serve linguistically diverse customers.<sup>32</sup>

<sup>32</sup> While this Language Access Plan focuses on how RTD provides language assistance to customers, it is important to note that RTD is also exploring how it can better support the agency's linguistically diverse staff. For instance, the Equal Employment Opportunity Office recently launched its training in Spanish, and Talent Acquisition began translating certain hiring assessments into Spanish as well. Other internally facing conversations, such as offering a pay differential to multilingual staff as well as tactics to hire more linguistically diverse staff, are ongoing.

# RTD 2025-2028 Language Access Plan

## Key Outcomes

### ***Outcome 1: Update and Monitor the LAP***

RTD will maintain, monitor, and regularly update its Language Access Plan (LAP) to guide the administration of language access efforts. In addition to the three-year LAP update, RTD will adjust its language access approach on an ongoing basis, adapting to changes in service area demographics. To stay attuned to language assistance needs, RTD will continuously monitor demographic trends and collaborate with community-based organizations serving linguistically diverse populations.

In 2022, RTD established a formalized Language Access Program within the Civil Rights Division's Transit Equity Office, and the LAP forms the backbone of this program. A dedicated Transit Equity Specialist will oversee its implementation, coordinating language access activities across departments while monitoring the agency for adherence to language access requirements.

### ***Outcome 2: Strengthen and Standardize Language Access Processes***

RTD will refine and formalize agency-wide language access processes to ensure consistency and adherence across departments. While the 2022-2025 LAP introduced key internal procedures for language assistance, the 2025-2028 LAP will focus on strengthening compliance, streamlining workflows, and incorporating feedback from linguistically diverse communities to improve service delivery.

### ***Outcome 3: Expand and Promote Language Assistance Services***

RTD will actively provide and promote language assistance services, in a culturally competent manner, to ensure equitable access for linguistically diverse customers. This includes offering interpretation at community events, translating vital materials, producing multilingual signage, and enhancing outreach and communications strategies to increase awareness of available language assistance services.

### ***Outcome 4: Enhance Employee Training and Resources to Serve Linguistically Diverse Customers***

RTD will ensure that all frontline employees know their obligations to provide meaningful access to RTD services for linguistically diverse people; accordingly, the agency will sufficiently equip employees to assist linguistically diverse customers by improving training programs and expanding available resources. Though RTD produced its inaugural Serving Non-English-Speaking Customers training during the 2022-2025 LAP, the agency aims to improve the training that staff receive as well as continuously assess and refine tools that facilitate effective communication between employees and linguistically diverse customers.

*Figure 7. 2025-2028 Language Access Implementation Calendar*

LAP Implementation Calendar		Target Completion			
Task ID	Task Description	2025	2026	2027	2028
<b>Outcome 1</b>	<b>Update and Monitor the LAP</b>				
1.1	Conduct annual LAP monitoring reviews	X	X	X	X
1.2	Complete Four Factor Analysis			X	X
1.3	Finalize Implementation Schedule for next LAP				X
1.4	Build out demographic tool (e.g., Tableau) that can be used agency-wide and/or publicly to inform the agency's Public Participation Plan and community engagement efforts.		X	X	

# RTD 2025-2028 Language Access Plan

<b>Outcome 2 Strengthen and Standardize Language Access Processes</b>					
2.1	Finesse process for in-vehicle signage installation to ensure signage uniformity across the RTD fleet, conducting audits as needed.	X	X		
2.2	Explore and establish translation review process for the translation tool on the RTD website.		X	x	
<b>Outcome 3 Expand and Promote Language Assistance Services</b>					
3.1	Add the top 10 safe harbor languages to RTD's website widget and Next Ride app.	X	X		
3.2	Produce Transit Watch e-lets in Spanish and explore the ability to add other languages.	X			
3.3	Explore feasibility of instating audio announcements in Spanish at select rail stations as well as on board vehicles; pilot announcements for fixed-route buses.	X	X		
3.4	Work with Communications and Operations to hang signage on rail vehicles into Spanish where not currently available.	X	X	X	X
3.5	Review signage in demand-response vehicles (e.g., FlexRide, Access-a-Ride) for opportunities to improve language accessibility and advertisement of the available language assistance services.		X		
3.6	Update signage in demand-response vehicles (as needed per Task 3.5).			X	
3.7	Ensure newly acquired Ticket Vending Machines' digital interface and signage offer adequate language assistance in RTD's top languages.	X	X		
3.8	Incorporate Spanish translation into shelterboards and improve shelterboard notification of language assistance.		X	X	X
3.9	Make email and text service alerts available in Spanish; explore integration in other safe harbor languages.		X		
3.10	Ensure language assistance measures are integrated into RTD's upcoming all-in-one mobile ticketing app.	X	X	X	
3.11	Procure and distribute "I Speak" buttons for frontline staff.	X			
<b>Outcome 4 Enhance Employee Training and Resources to Serve Linguistically Diverse Customers</b>					
4.1	Develop digitized version of Serving Non-English-Speaking customers training.	X			

# RTD 2025-2028 Language Access Plan

4.2	Input language access tools into upcoming digitized employee Trailblazer.	x	X		
4.3	Procure additional RTD Basic Spanish for Transit Employees Handbooks.	X			
4.4	Explore providing translation devices in RTD fixed-route buses.	X	X	X	
4.5	Pilot providing in-person Spanish language courses for staff (following cancellation of pre-pandemic courses).		X		
4.6	Expand advertisement of language-learning resources, including (but not limited to) professional development funds available for language learning apps.	X	X		

## Conclusion

As part of the 2022-2025 Language Access Plan, RTD made great strides in strategizing and pursuing its language access efforts, setting a firm foundation for the 2025-2028 Language Access Plan. The 2025-2028 LAP builds upon the framework and associated tasks noted in the 2022-2025 LAP, provides updated data on the language needs of the Denver metro area, and identifies specific, measurable, and data-driven tasks to continue to improve the language accessibility of RTD's transit services and programs. Through its language access and other efforts, RTD will continue to build a respectful, dignified, and welcoming transit environment for all.

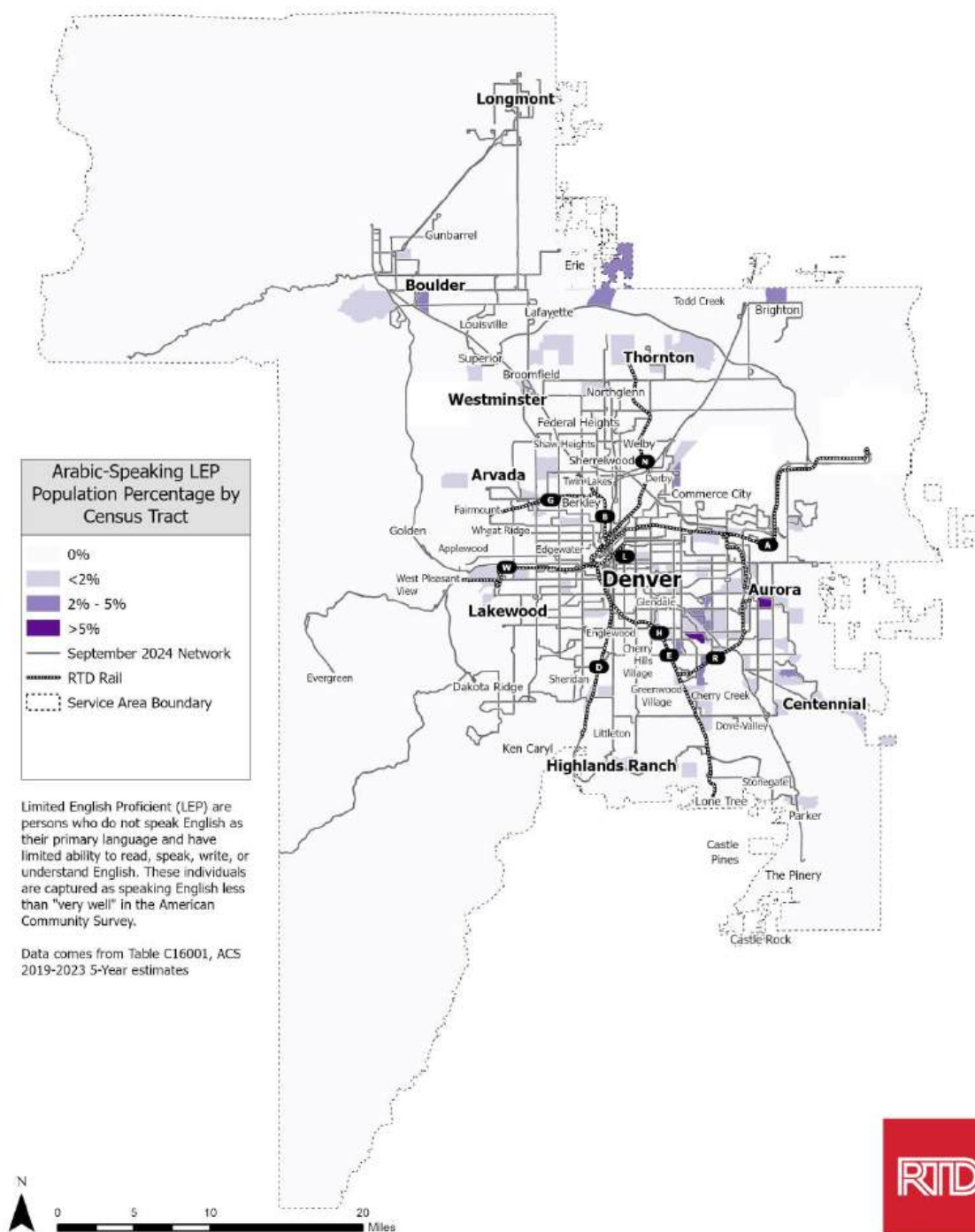
# RTD 2025-2028 Language Access Plan

## Appendix

### Appendix A: Additional ACS and PUMS Maps

#### ACS Maps

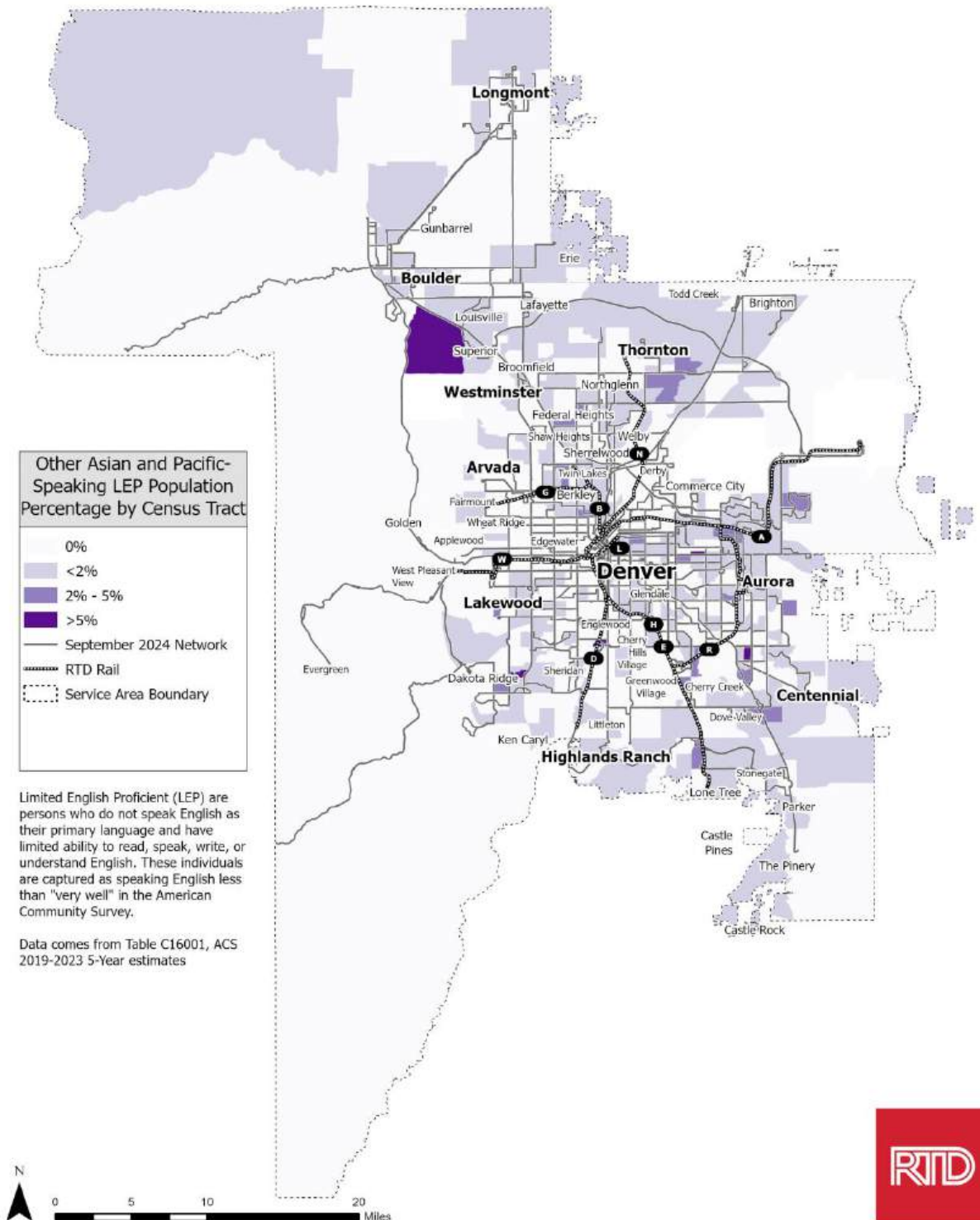
##### Limited English Proficient Arabic-Speaking Population Distribution





# RTD 2025-2028 Language Access Plan

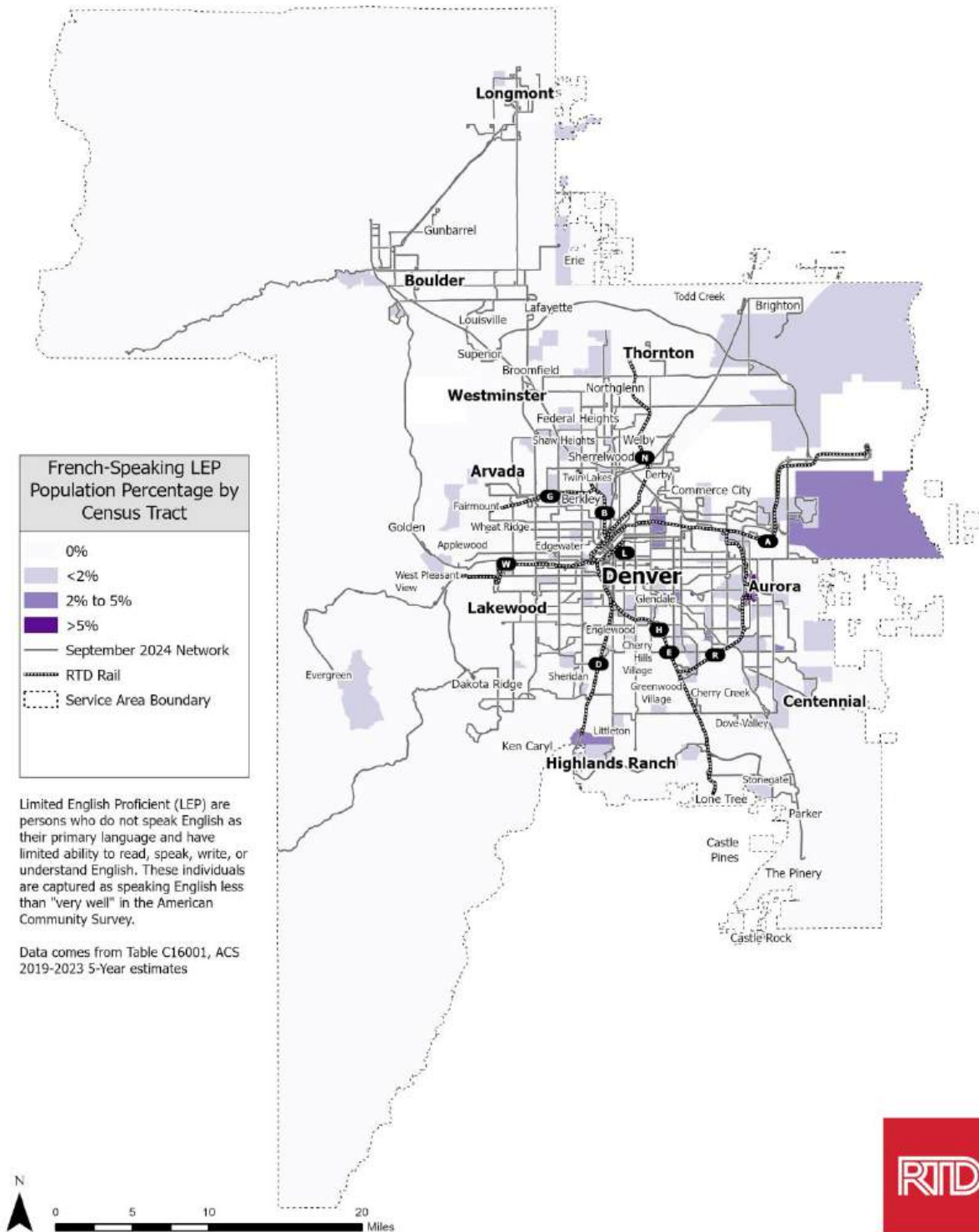
## Limited English Proficient Other Asian and Pacific-Speaking Population Distribution





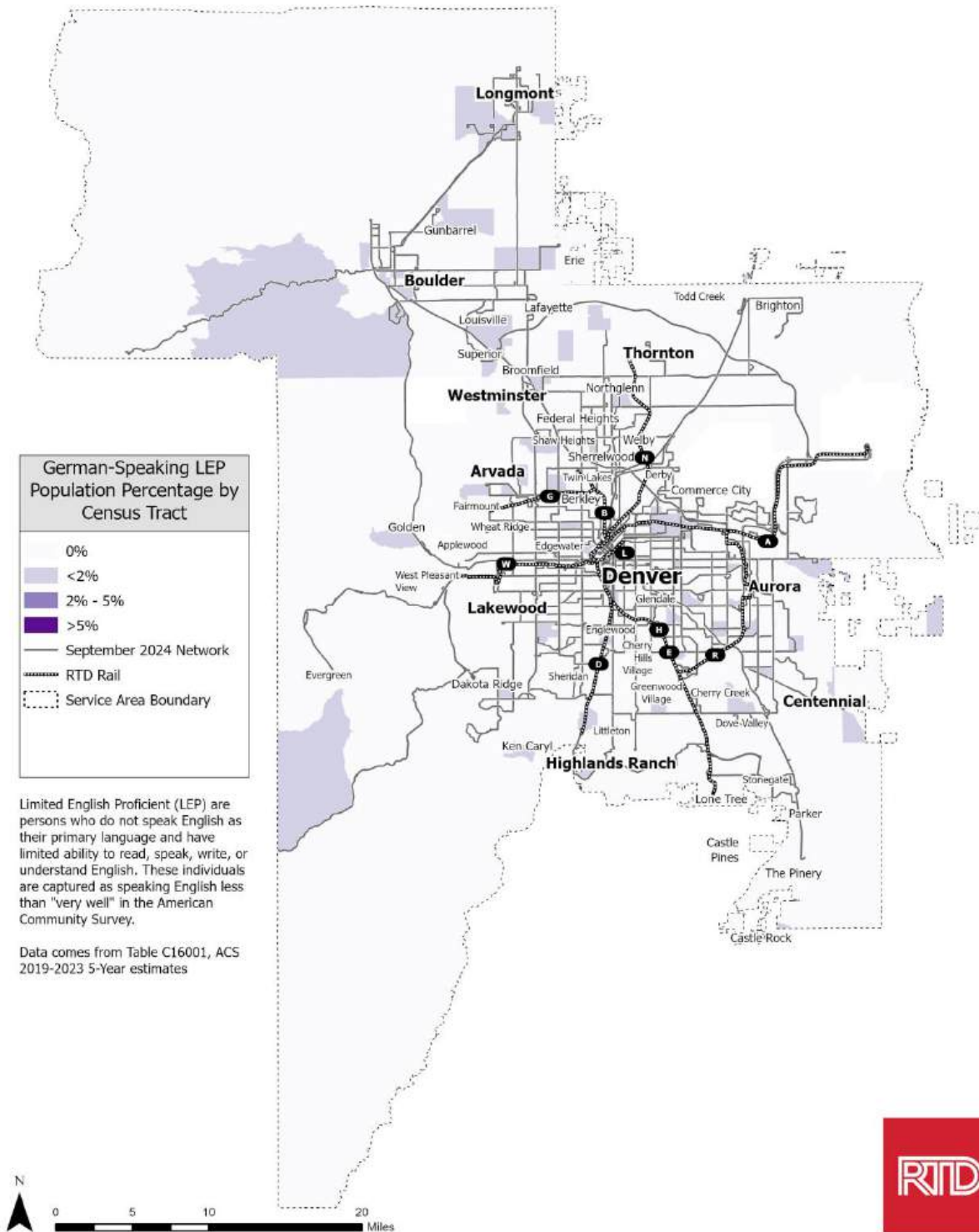
# RTD 2025-2028 Language Access Plan

## Limited English Proficient French-Speaking Population Distribution



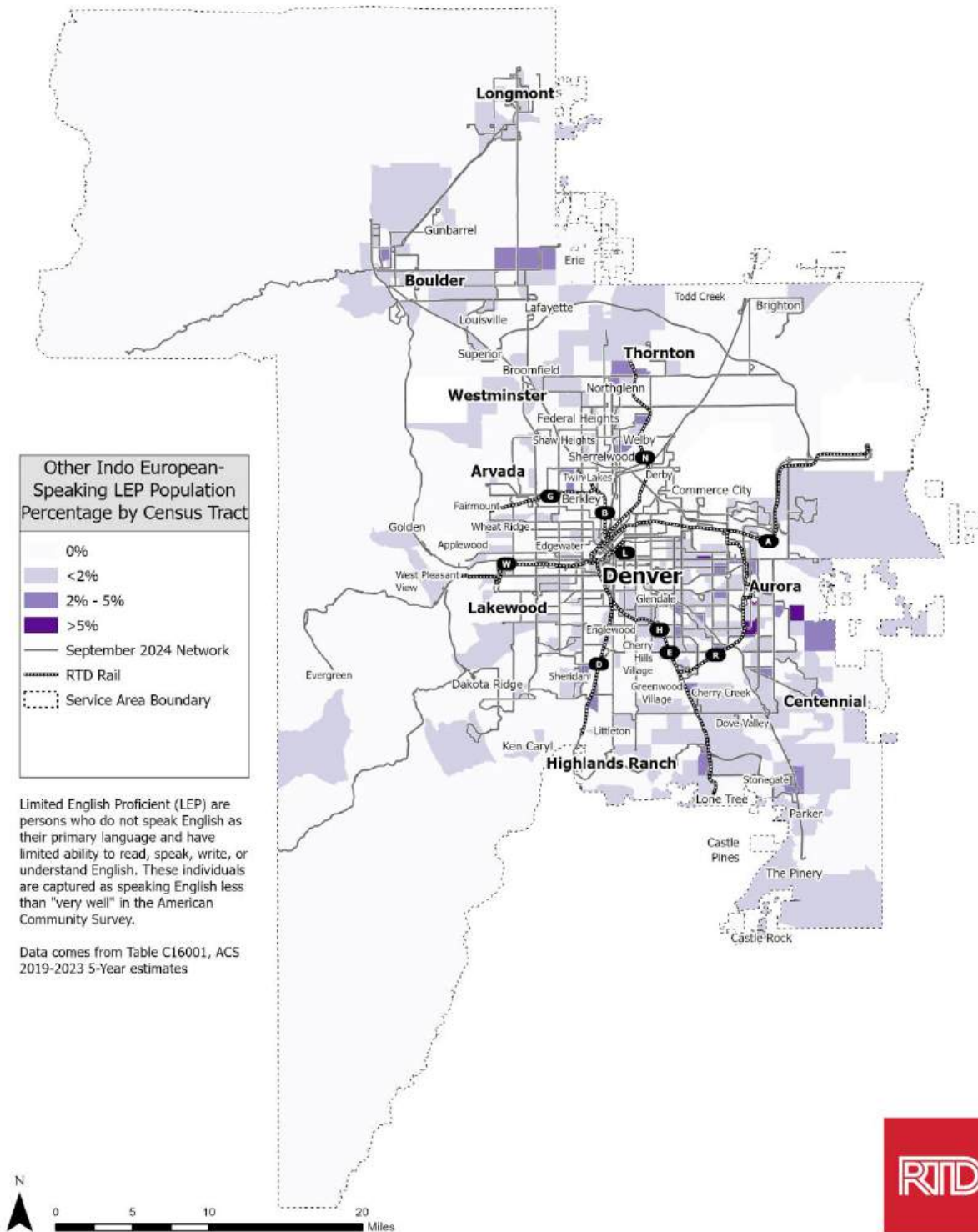
# RTD 2025-2028 Language Access Plan

## Limited English Proficient German-Speaking Population Distribution



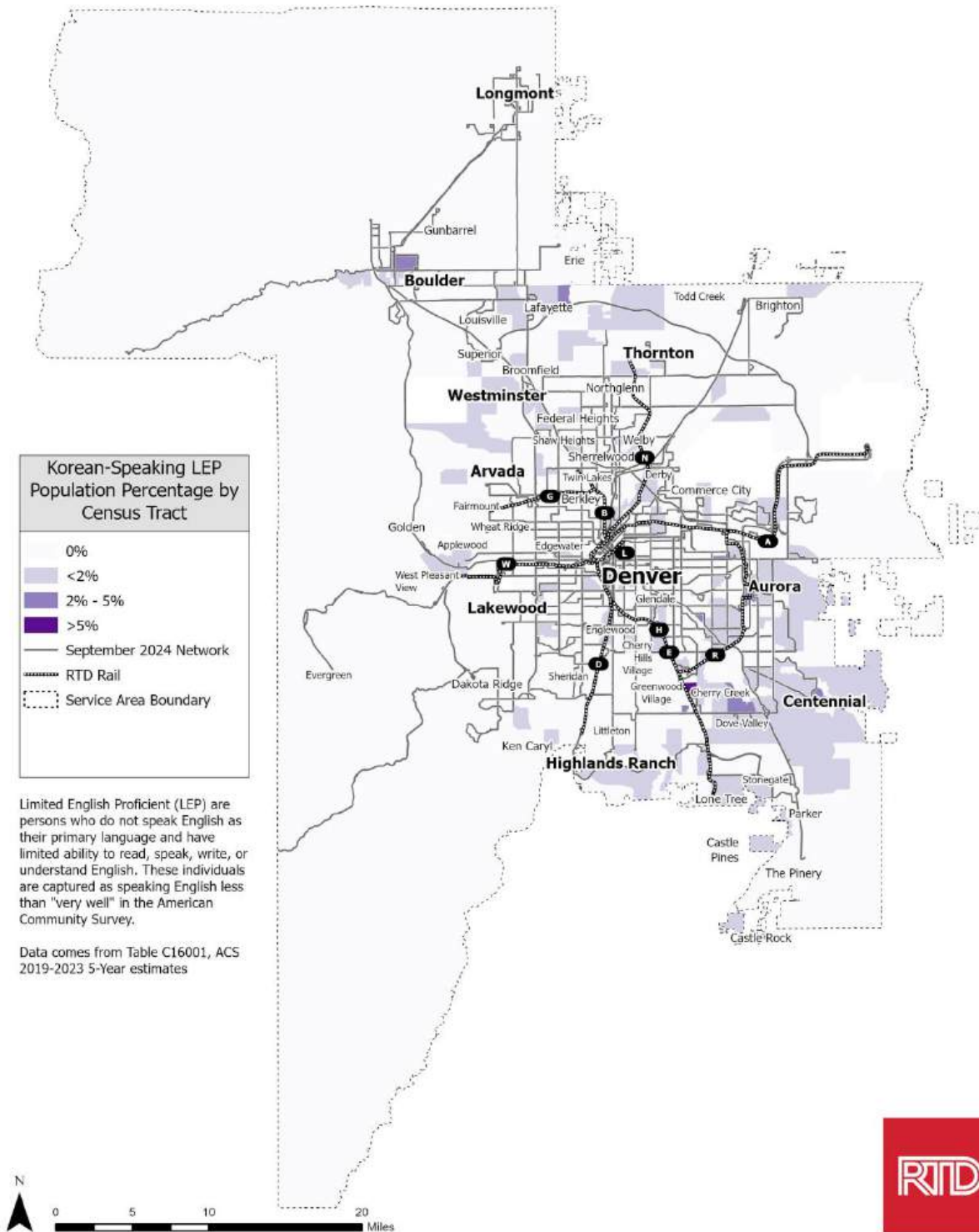
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Other Indo European-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

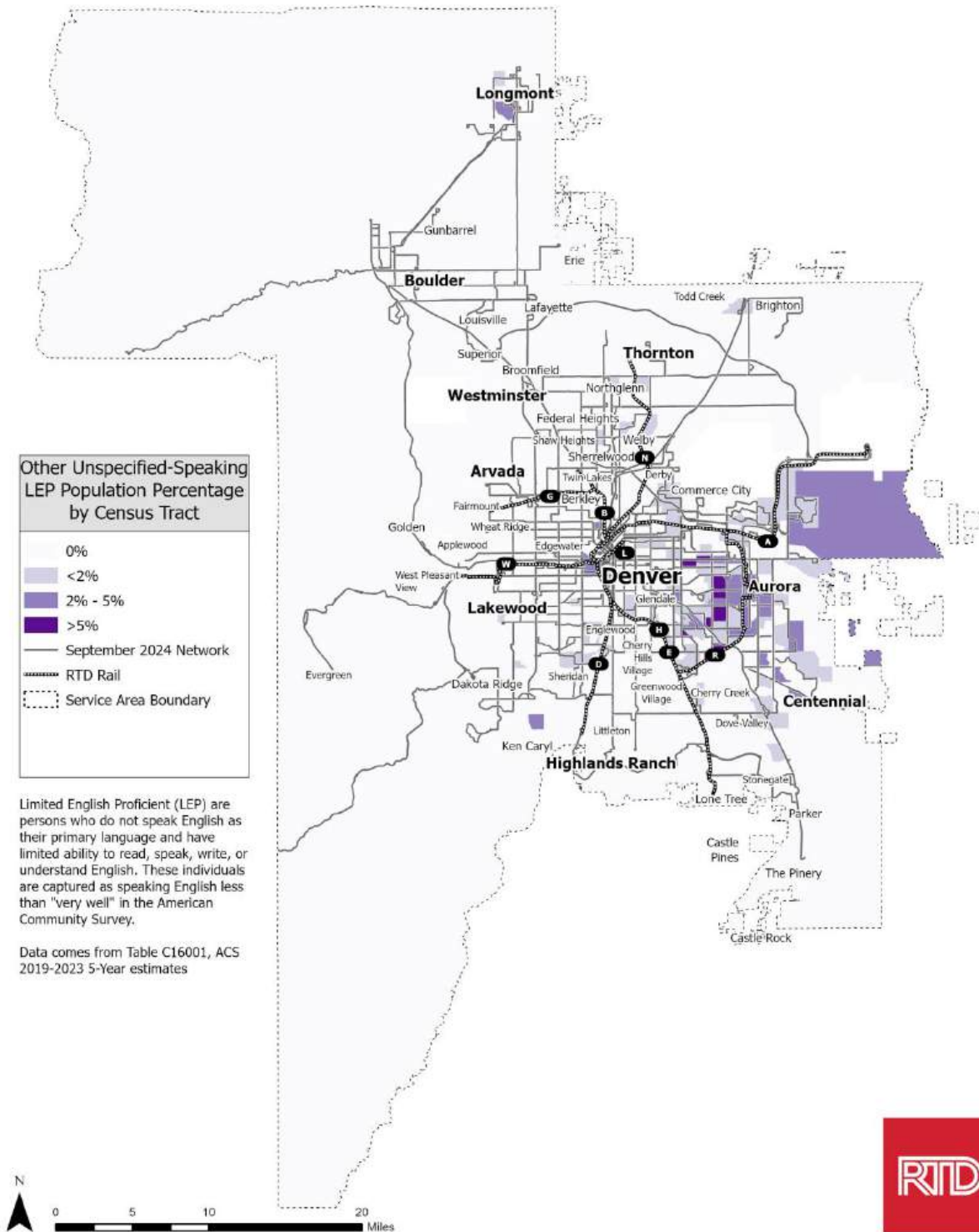
## Limited English Proficient Korean-Speaking Population Distribution





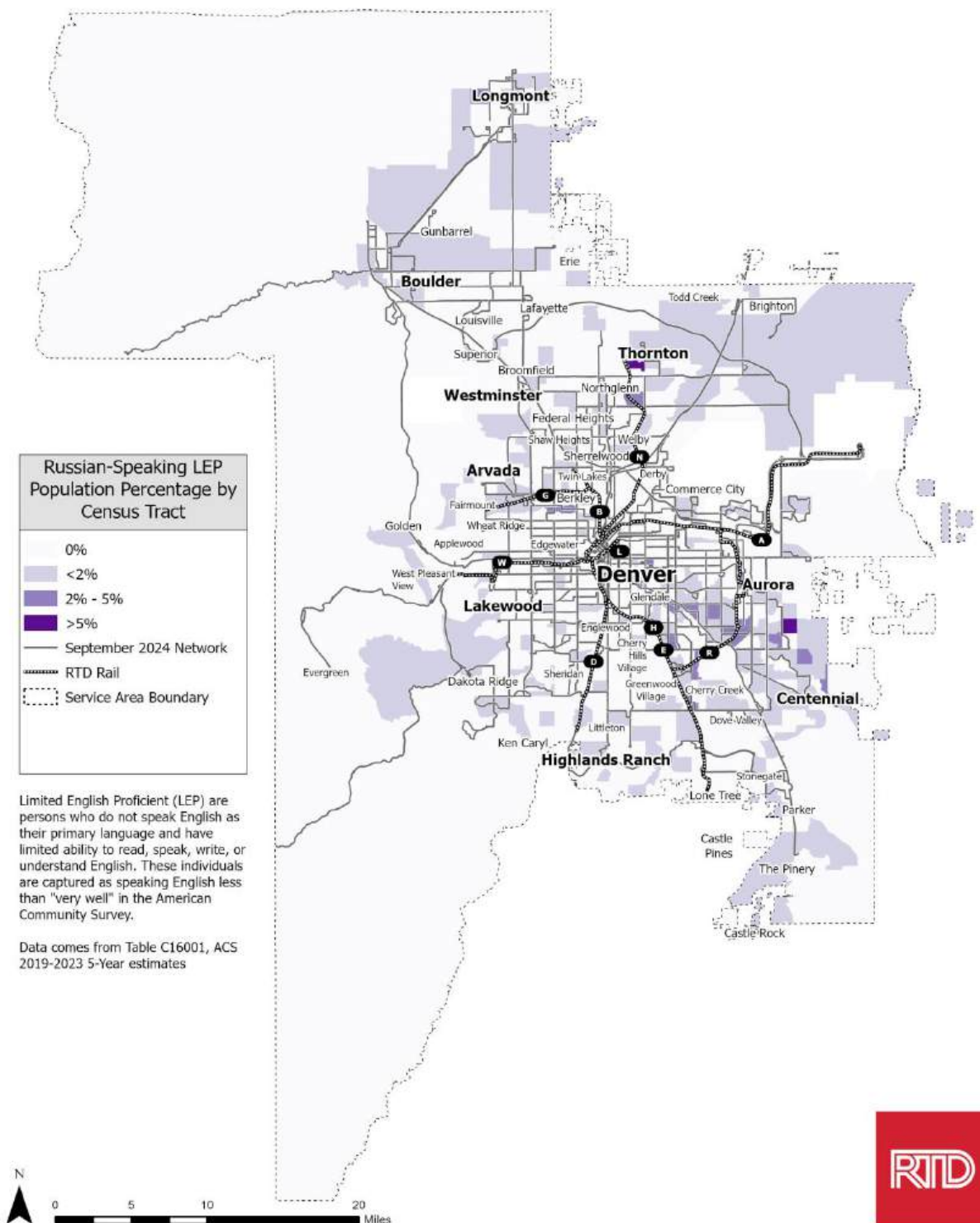
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Other Unspecified-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

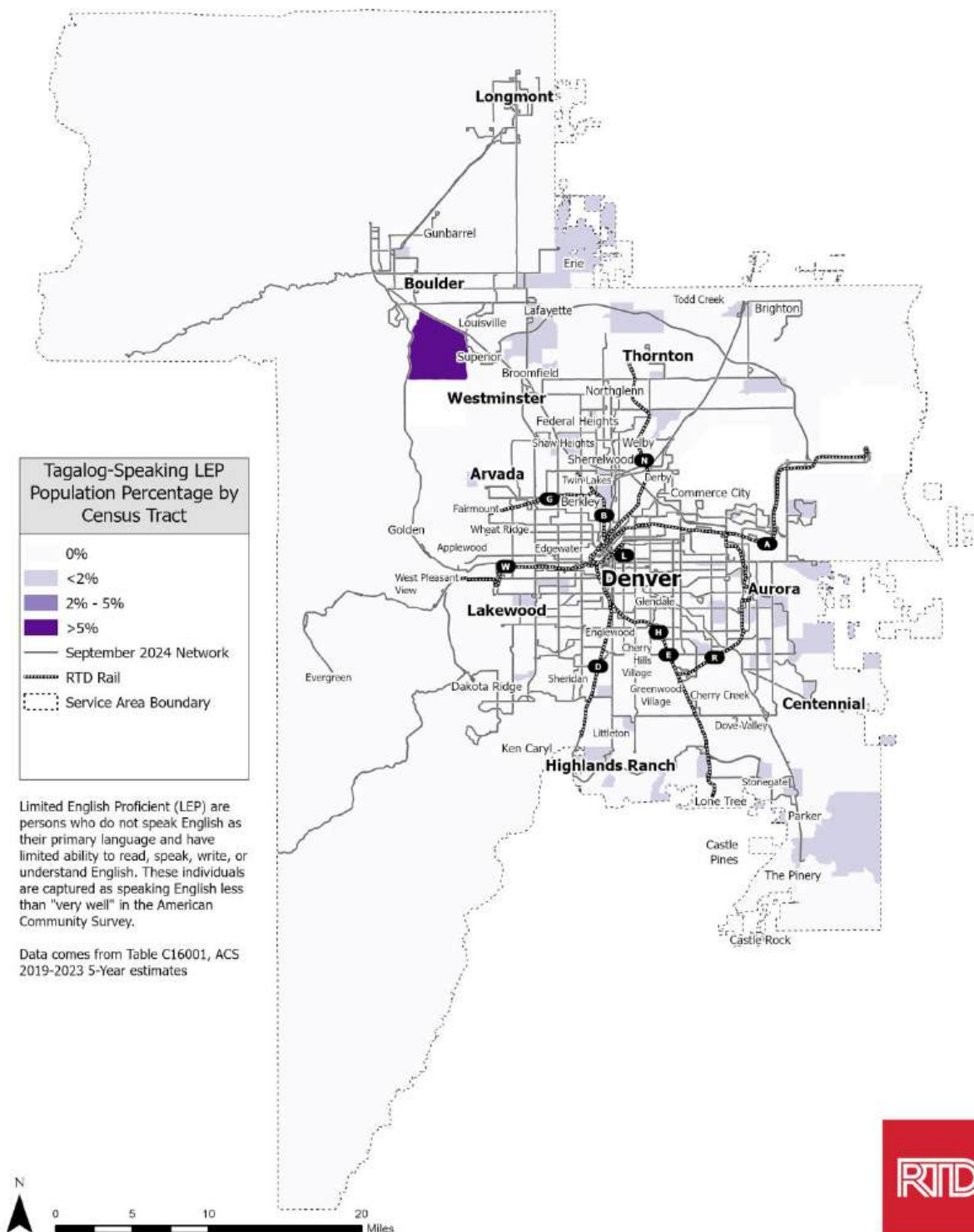
## Limited English Proficient Russian-Speaking Population Distribution





# RTD 2025-2028 Language Access Plan

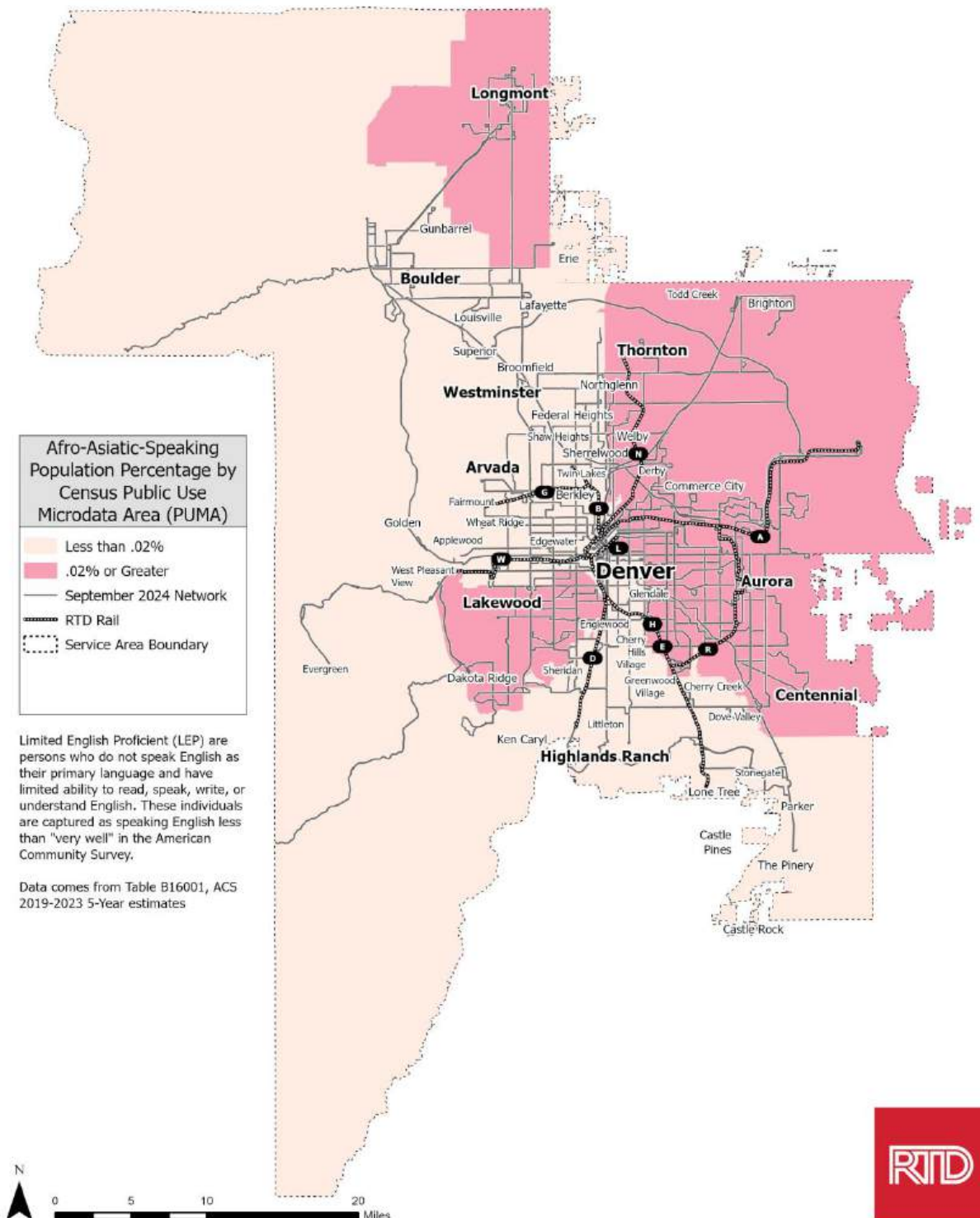
## Limited English Proficient Tagalog-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

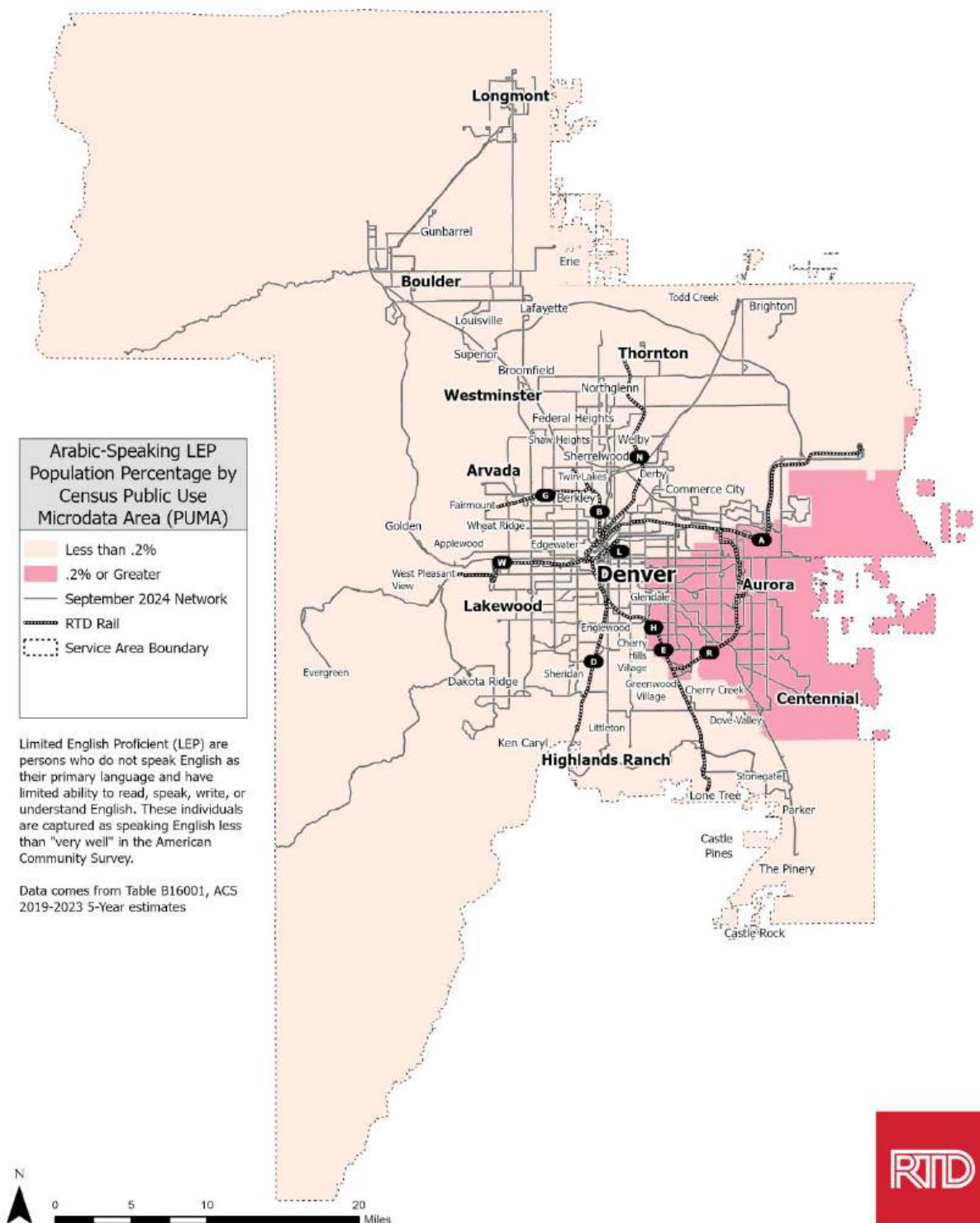
## PUMS Maps

### Limited English Proficient Afro-Asiatic-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

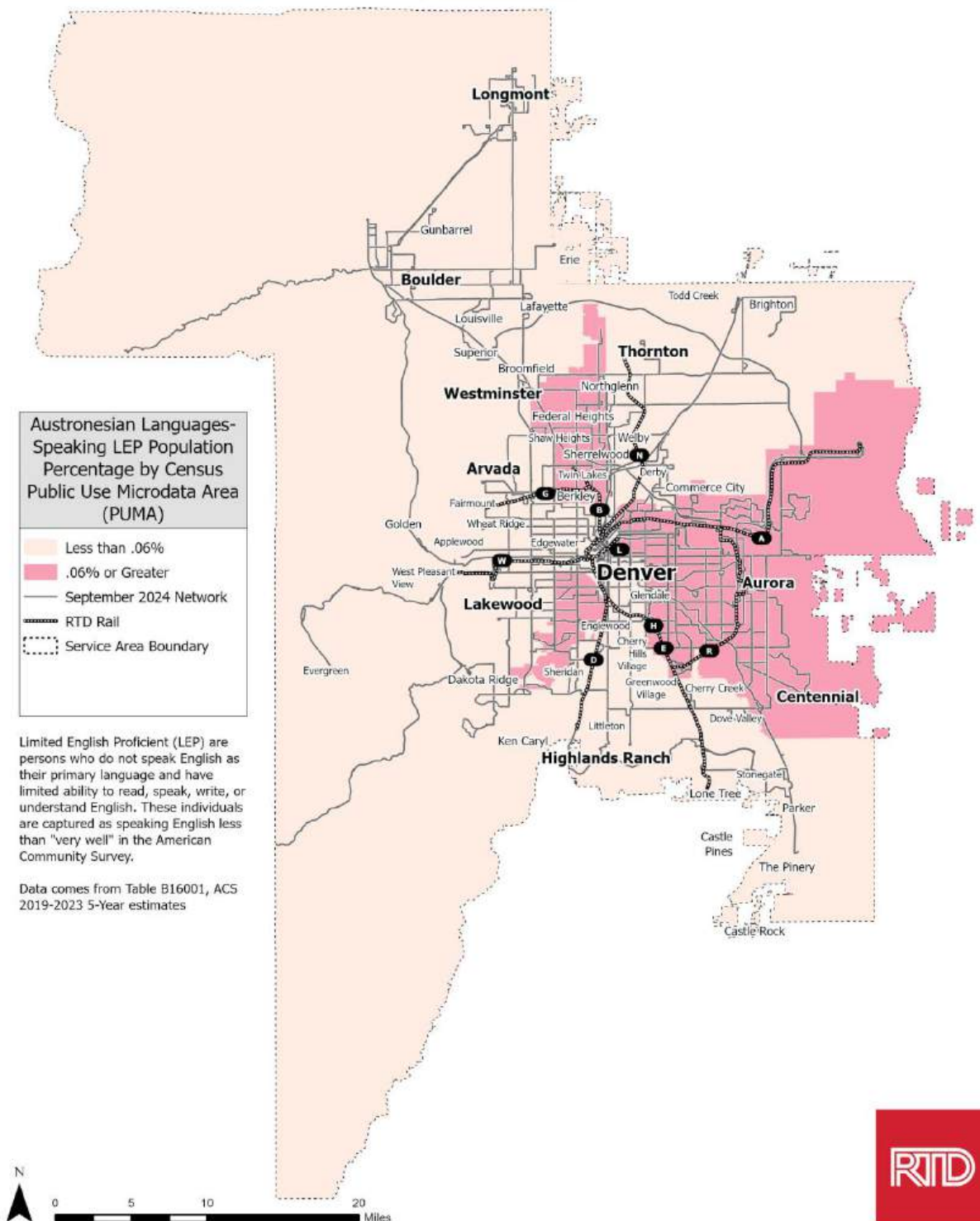
## Limited English Proficient Arabic-Speaking Population Distribution





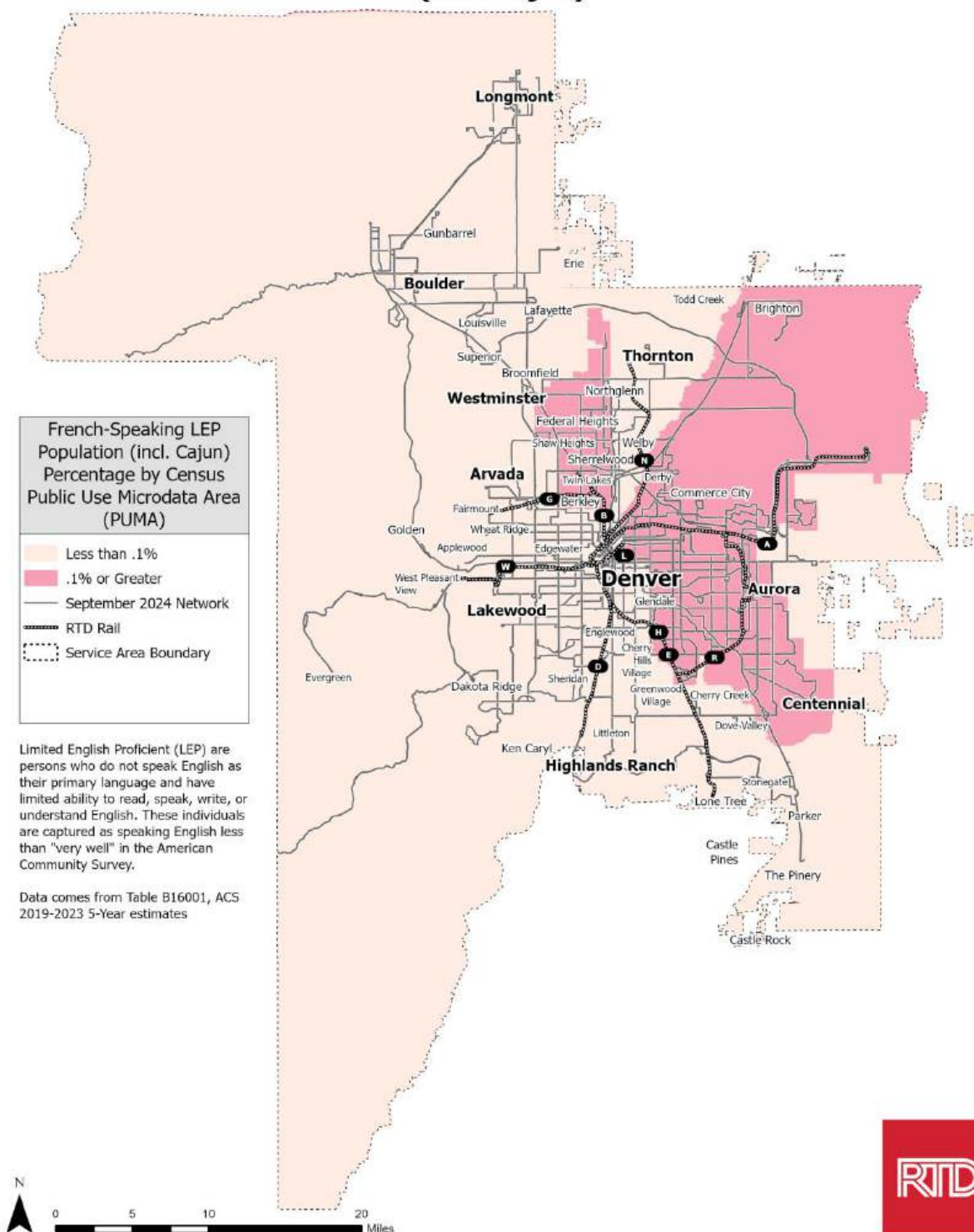
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Austronesian Languages-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

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



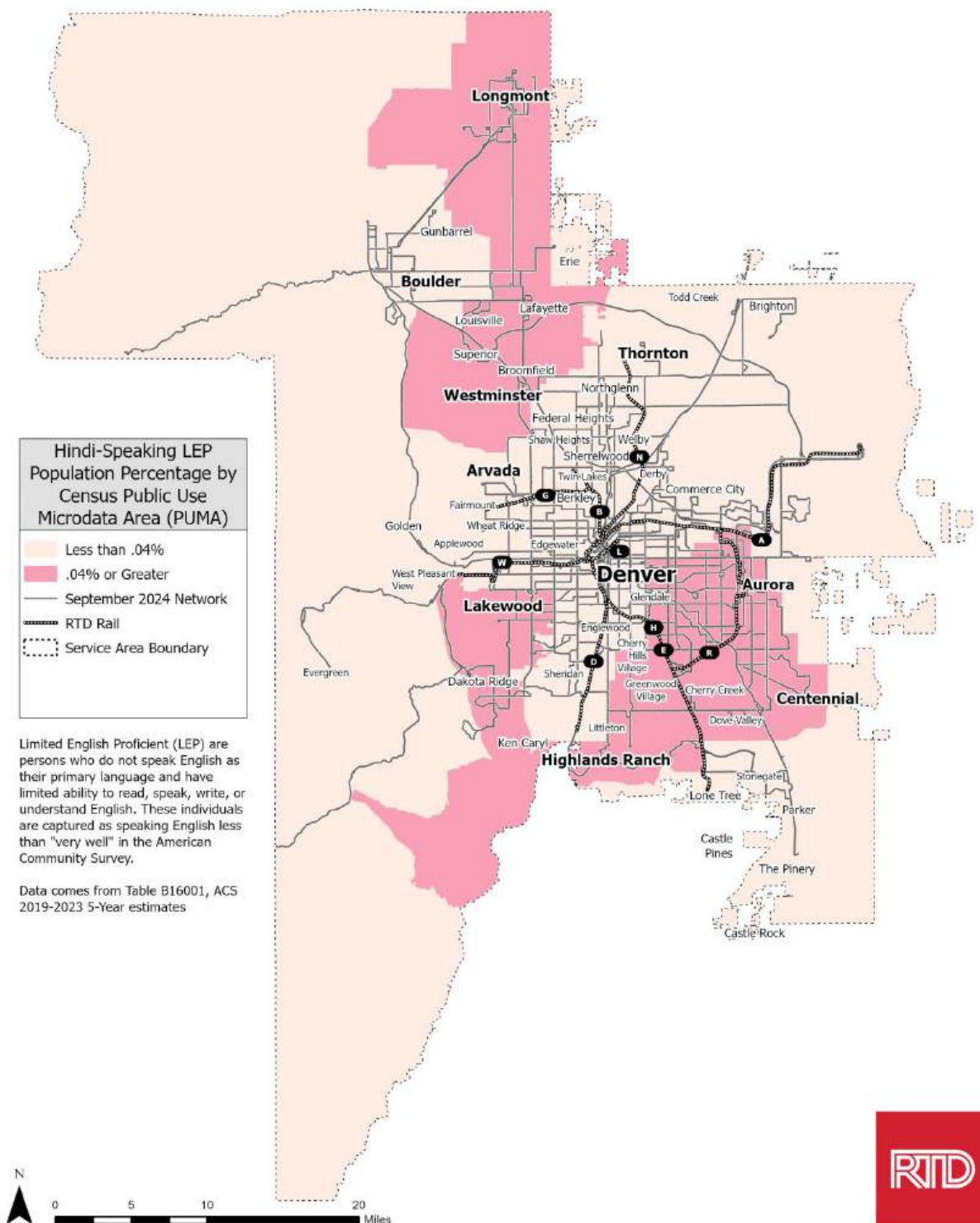
\_\_\_\_\_





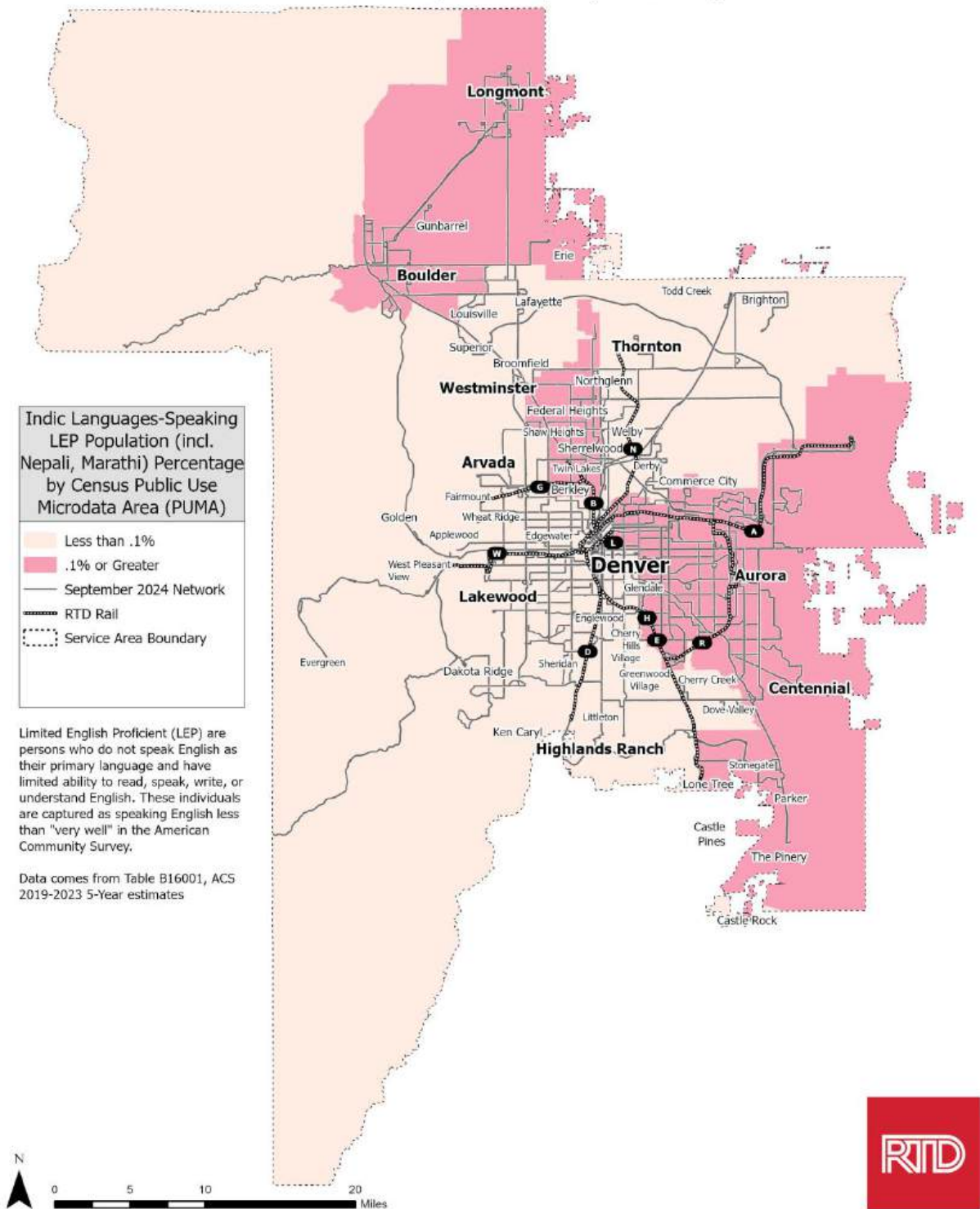
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Hindi-Speaking Population Distribution



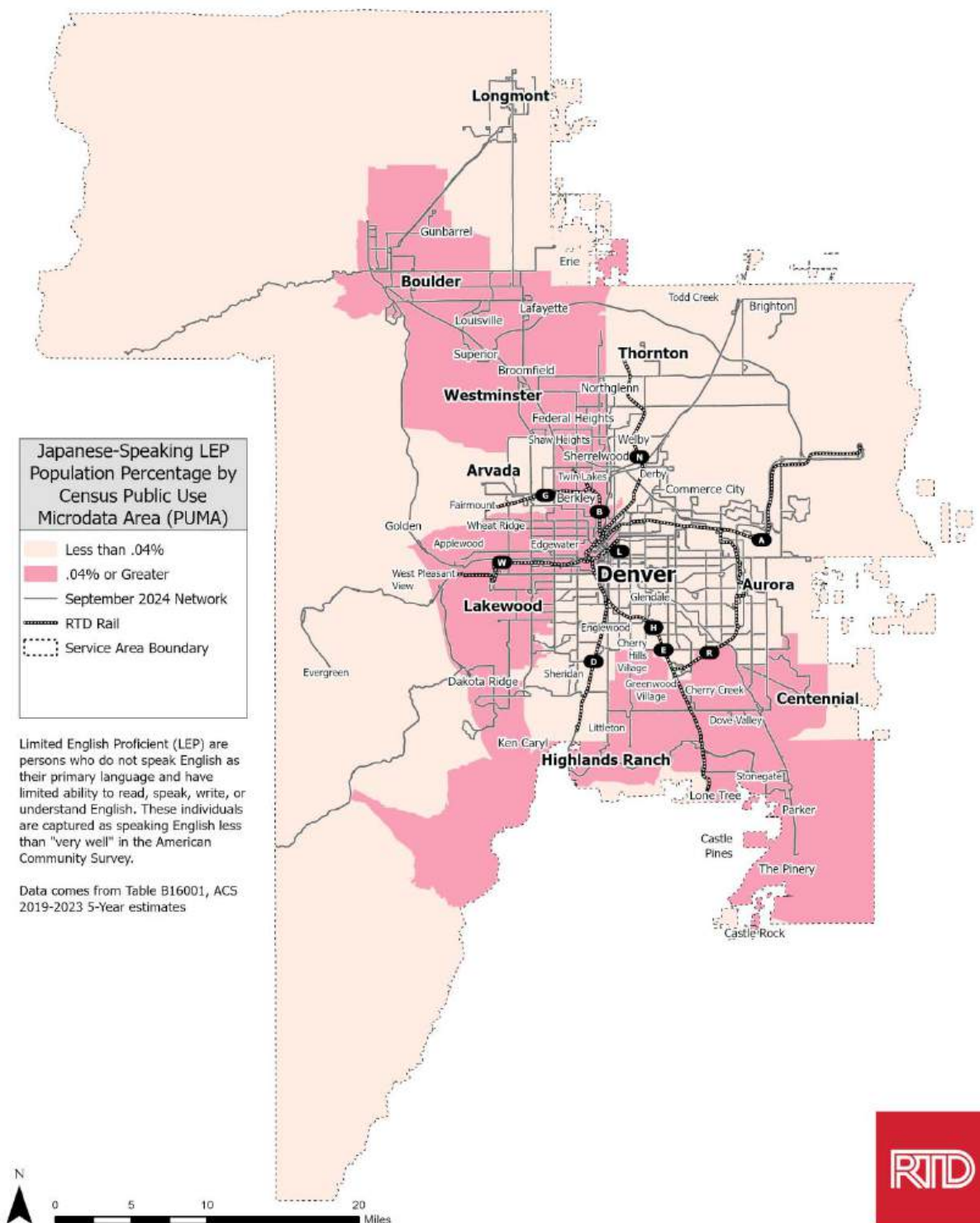
# RTD 2025-2028 Language Access Plan

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



# RTD 2025-2028 Language Access Plan

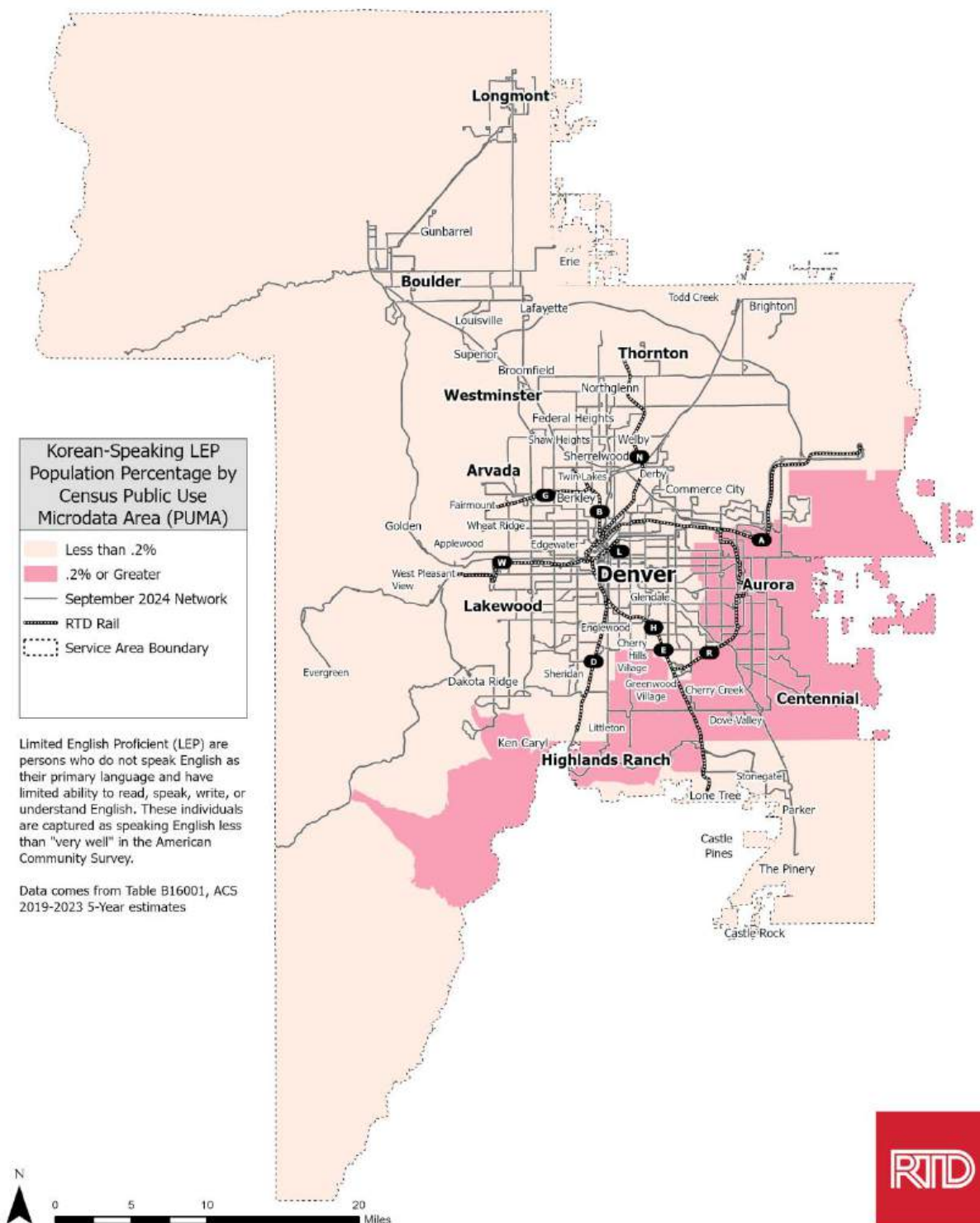
## Limited English Proficient Japanese-Speaking Population Distribution





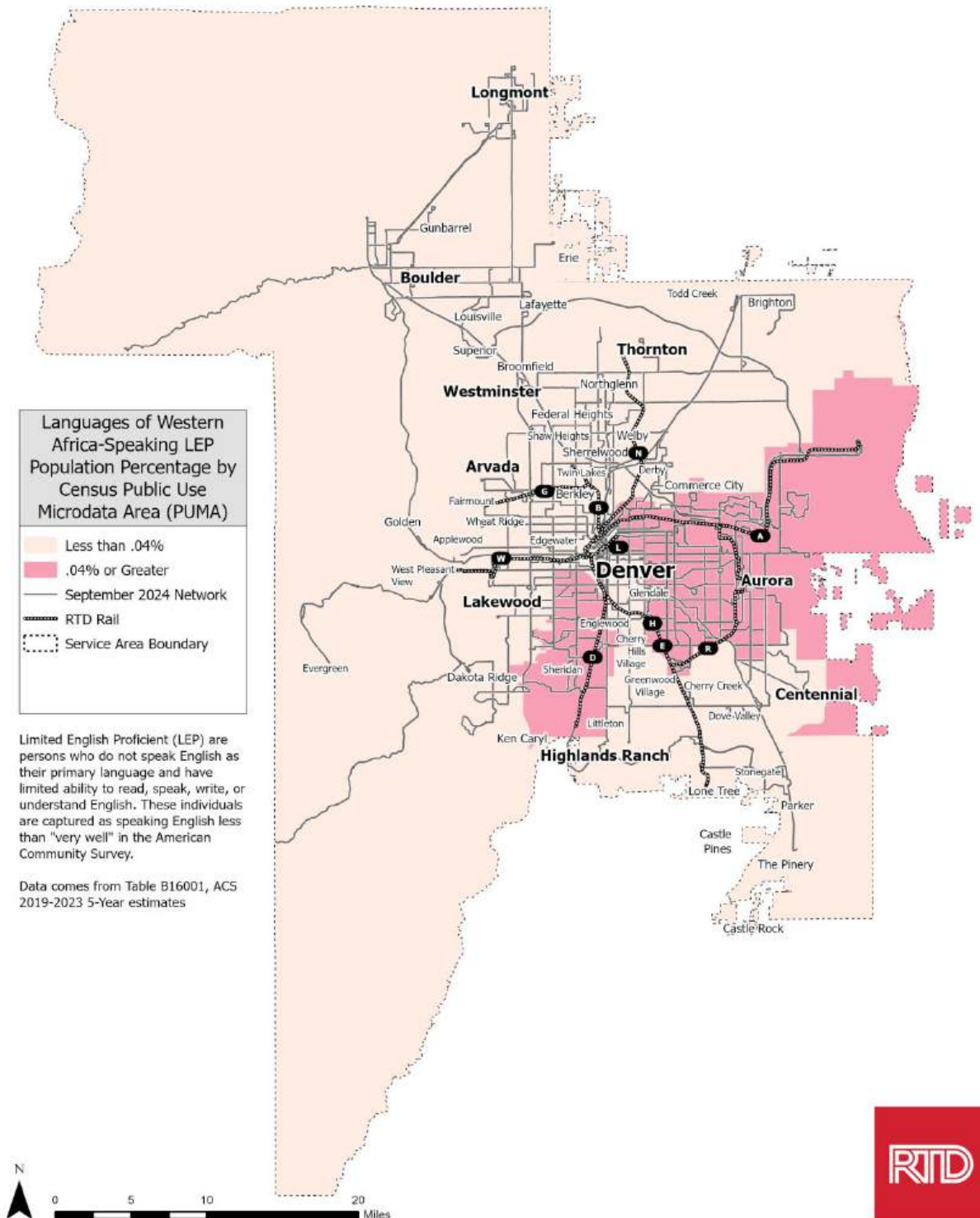
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Korean-Speaking Population Distribution



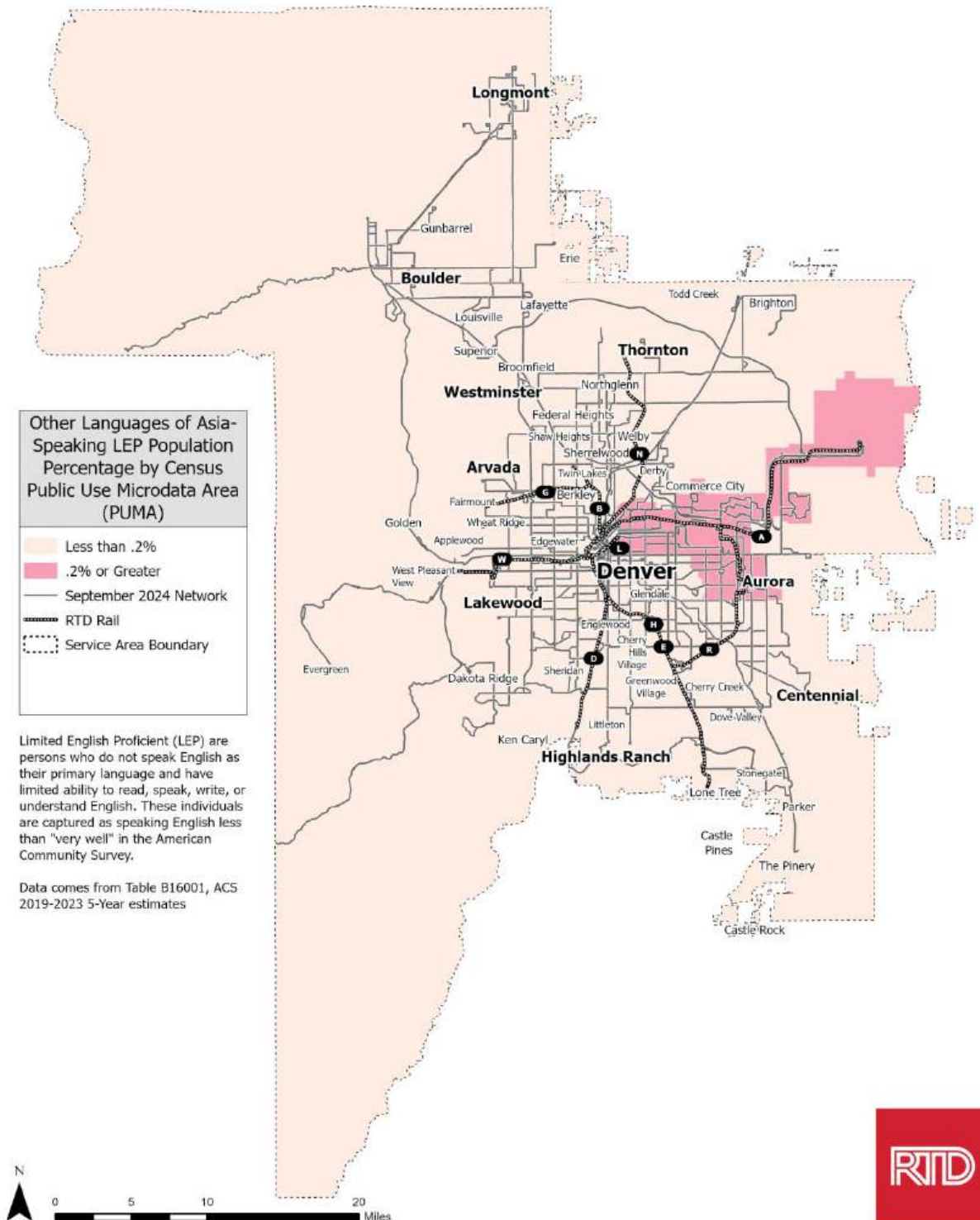
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Languages of Western Africa-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

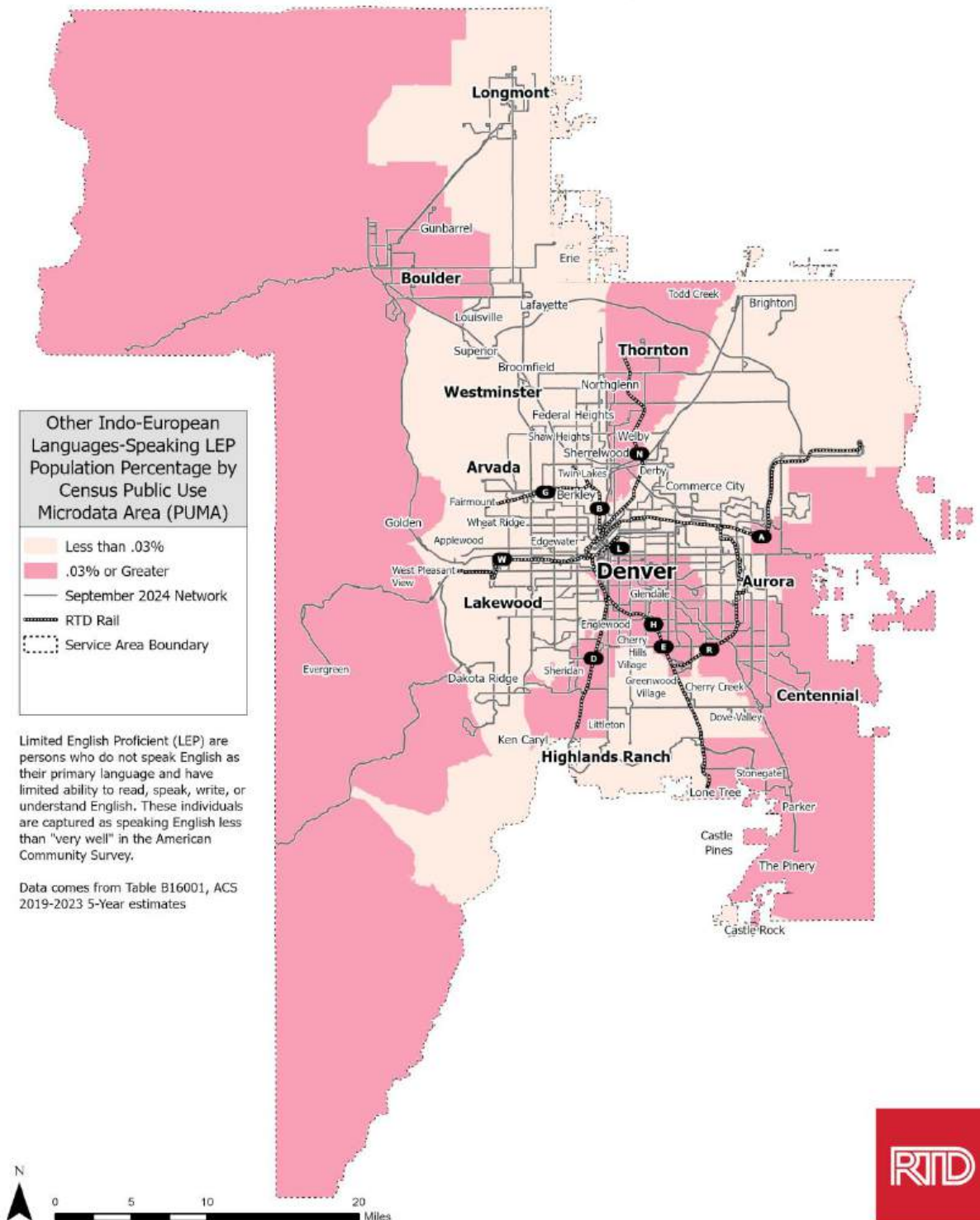
## Limited English Proficient Other Languages of Asia-Speaking Population Distribution





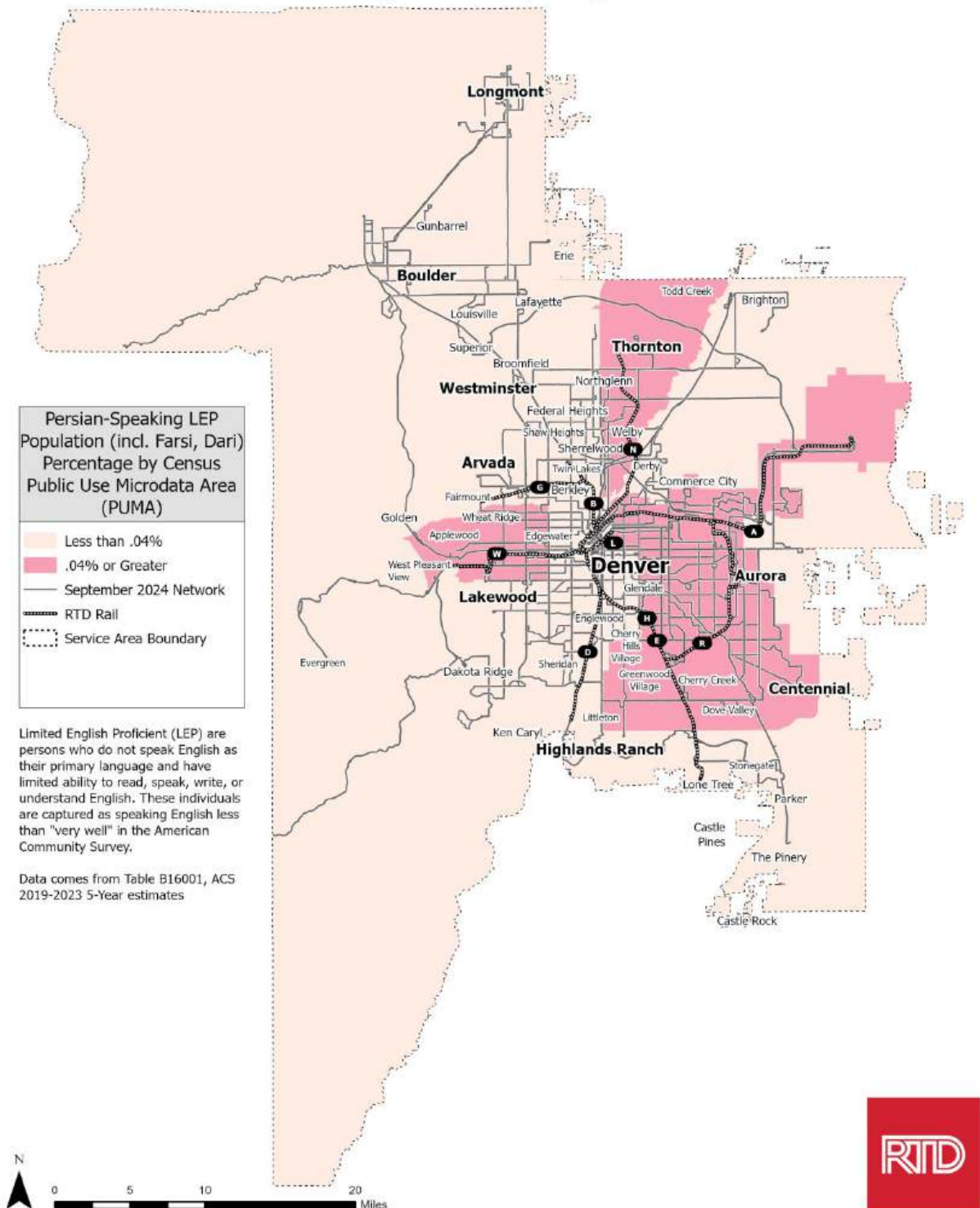
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Other Indo-European Languages-Speaking Population Distribution



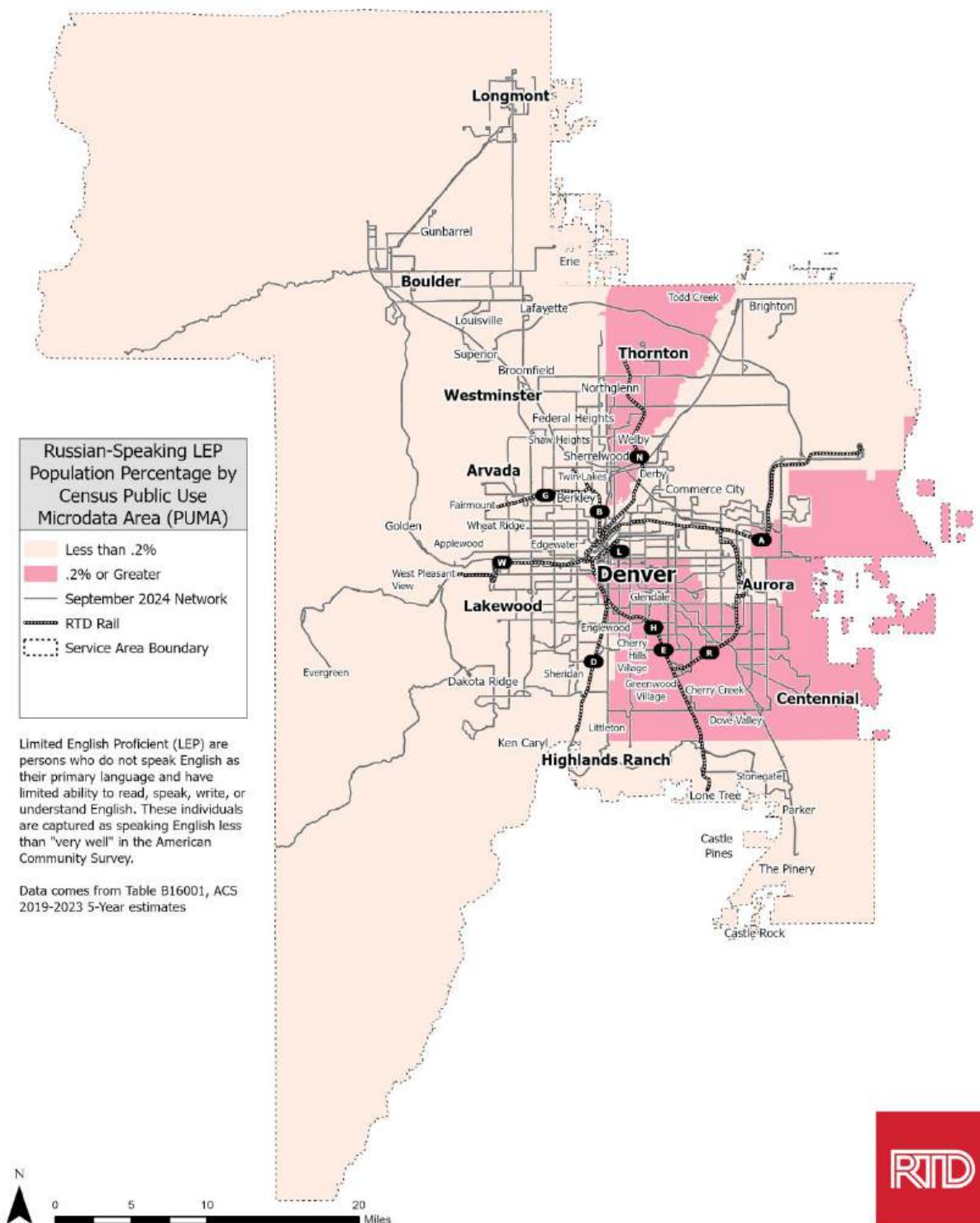
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Persian-Speaking Population Distribution (incl. Farsi, Dari)



# RTD 2025-2028 Language Access Plan

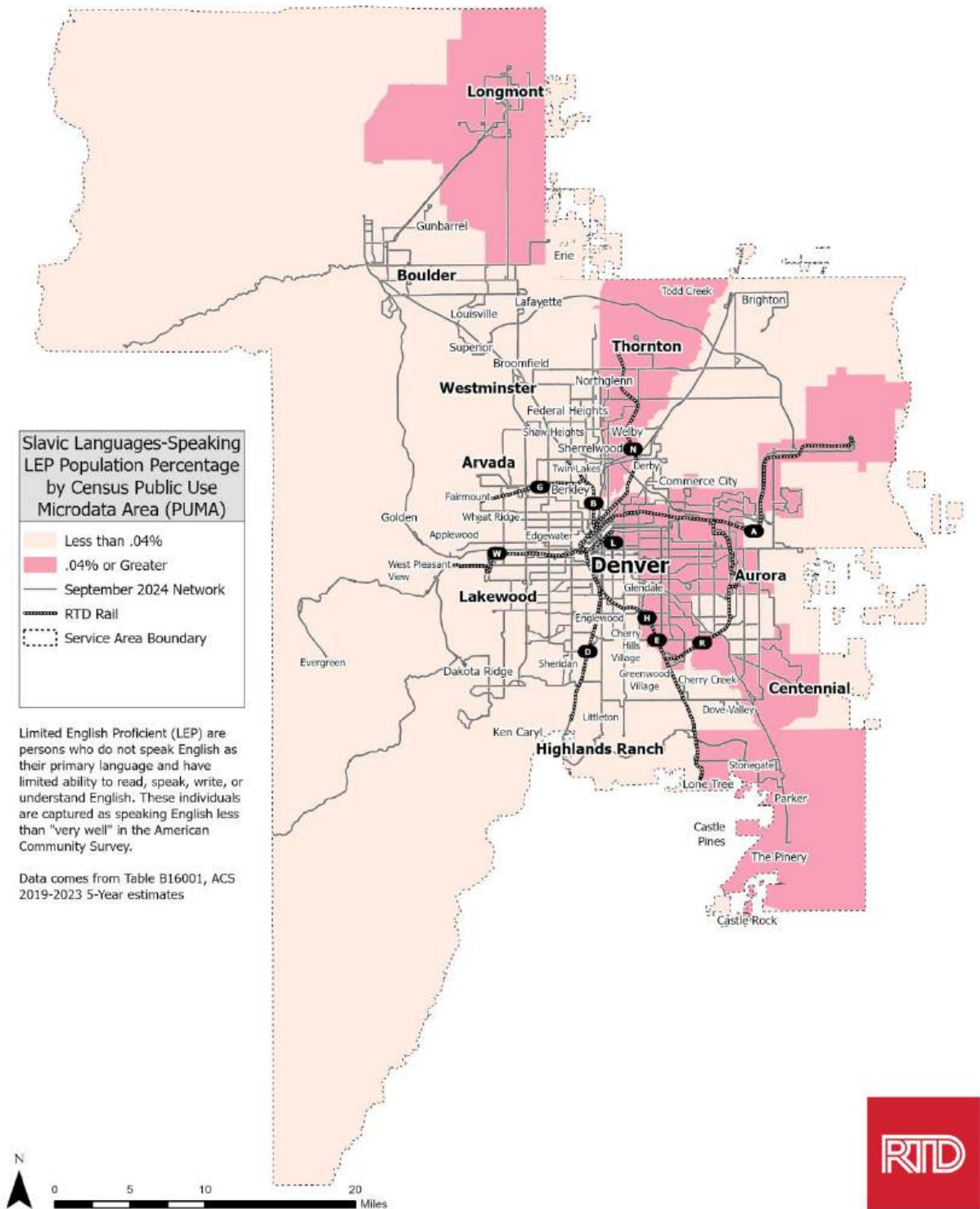
## Limited English Proficient Russian-Speaking Population Distribution





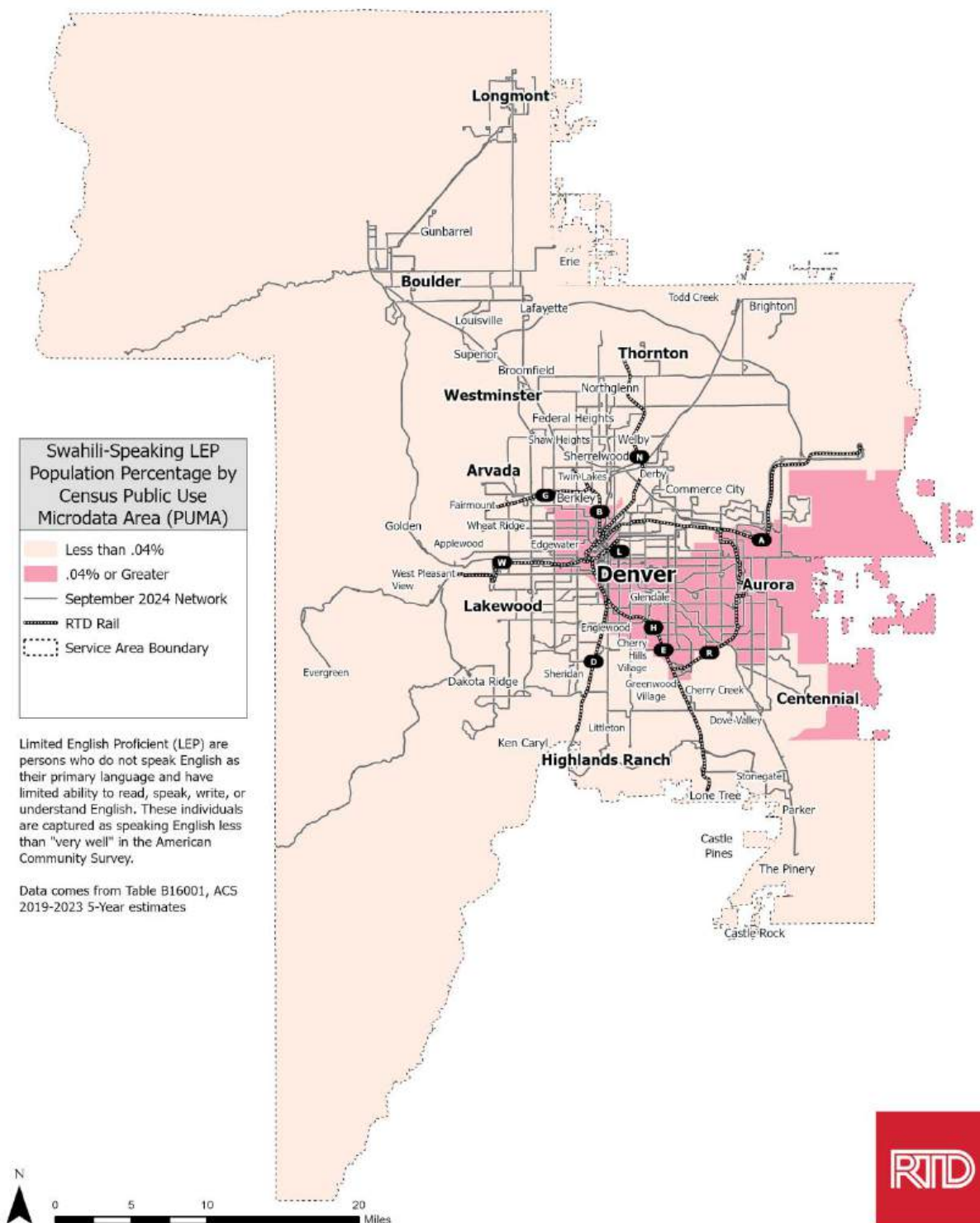
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Slavic Languages-Speaking Population Distribution



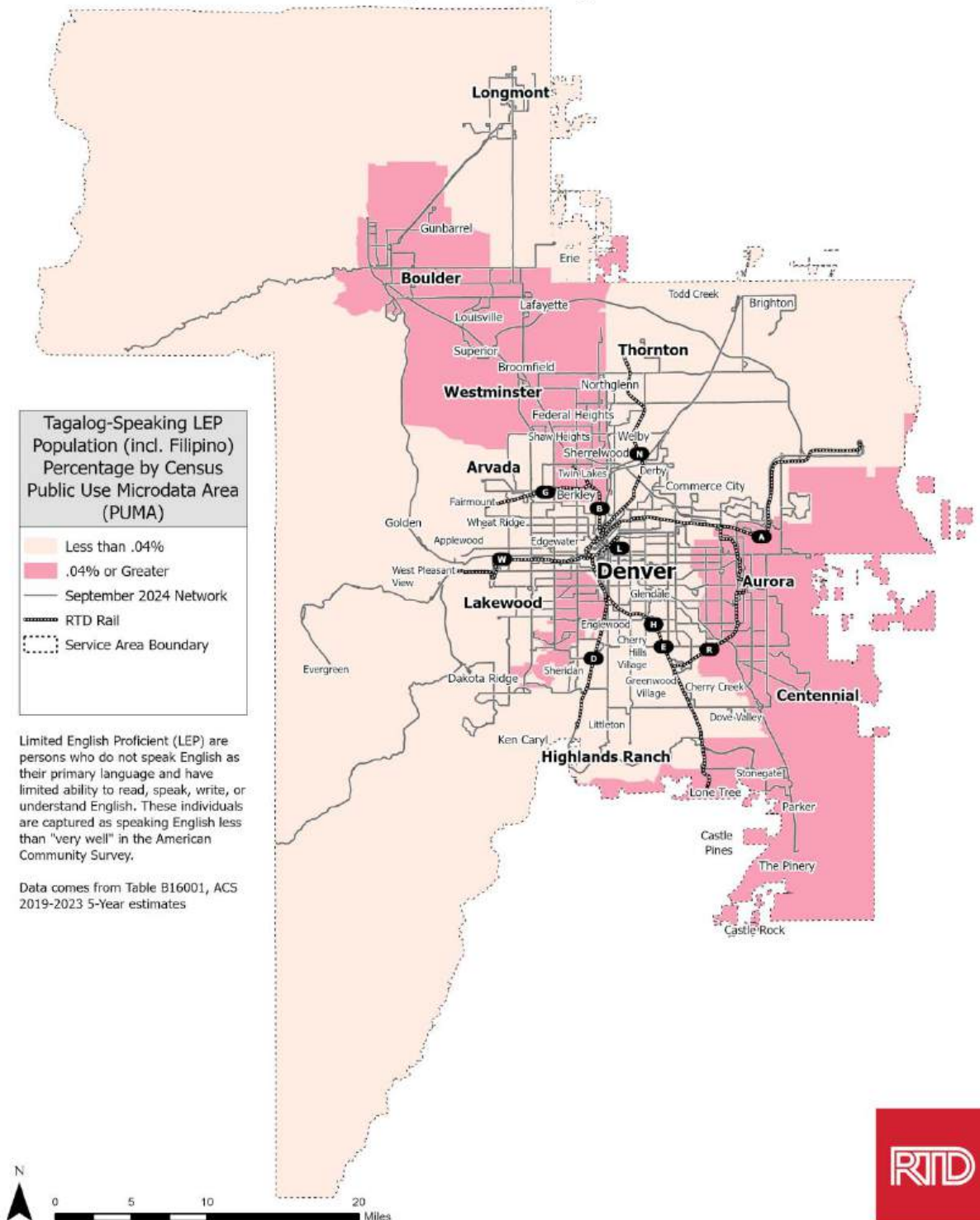
# RTD 2025-2028 Language Access Plan

## Limited English Proficient Swahili-Speaking Population Distribution



# RTD 2025-2028 Language Access Plan

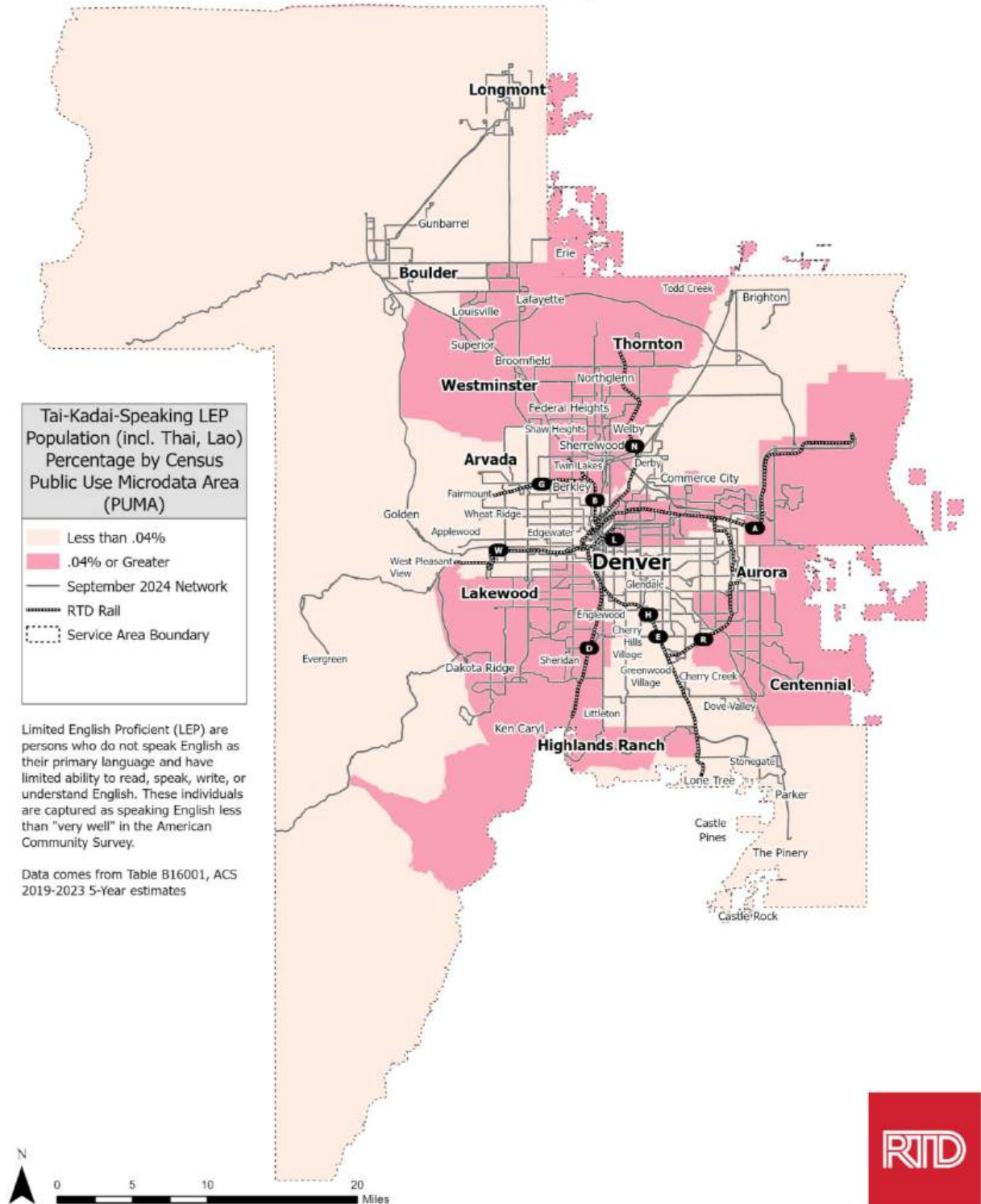
## Limited English Proficient Tagalog-Speaking Population Distribution (incl. Filipino)





# RTD 2025-2028 Language Access Plan

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



# RTD 2025-2028 Language Access Plan

## Appendix B: Factor 2 Survey Instrument (Paper Copy)

The Civil Rights Division is conducting a brief survey with staff to better understand how frontline staff and contractors interact with customers who speak limited or no English as well as customers with disabilities. All staff and contractors who interact with customers, either in-person, over the phone or digitally (e.g., email, social media) are invited to participate. The survey will take approximately 15 minutes or less to complete.

**Represented employees who complete the survey will be compensated for 20 minutes regular pay.**

**Please submit the paper copy of the survey by 11:59 PM MT on October 31 to your manager.** If you prefer to take the survey online, please go to [www.rtd-denver.com/TEOADASurvey](http://www.rtd-denver.com/TEOADASurvey) or scan the QR code below.



**1. As of October 2024, in which RTD department/division were you working? The lists provided for each department are intended to serve as guidance and may not represent every single function within the department.**

- ☐ Administration, including:
  - Civil Rights
  - Contracting and Procurement
  - Cybersecurity
  - Information Technology
  - Safety and Environmental Compliance
- ☐ Bus Operations, including:
  - Administrative Support
  - Contracted Services
  - Maintenance
  - Street Operations
  - Transportation
- ☐ Capital Programs, including:
  - Engineering
  - Construction
  - Mapping and Engineering
  - Real Property
  - Quality Assurance and Budget
  - FasTracks Program Closeout
  - Fixed Facilities
  - Facilities Maintenance
- ☐ Communications and Engagement, including:
  - Community Engagement
  - Customer Care
  - Government Relations
  - Marketing
  - Public Relations
- ☐ Finance, including:
  - Accounting
  - Asset Management
  - Budget and Financial Analysis
  - Cost Control
  - Treasury
- ☐ General Counsel, including:
  - Information Governance and Management
  - Risk Management
  - Legal Services
- ☐ Human Resources, including:
  - Benefits/Compensation/Wellness
  - Development and Training
  - HR DOT Compliance/Office Services
  - Labor Relations
  - Support Services
  - Talent Acquisition
- ☐ Paratransit
- ☐ Planning, including:
  - Planning Technical Services
  - Transit Oriented Communities
- ☐ Rail Operations, including:
  - Administrative Support
  - Commuter Rail
  - Contracted Services
  - Light Rail
- ☐ Service Development
- ☐ Transit Police and Emergency Management
- ☐ Not listed here (Please specify):  
\_\_\_\_\_

# RTD 2025-2028 Language Access Plan

## 2. About how often do you interact with RTD customers?

- ☐ Never – I don't interact with customers  
(SKIP TO END OF SURVEY)
- ☐ Once weekly
- ☐ Daily
- ☐ Once monthly
- ☐ Almost daily
- ☐ Rarely

The following questions ask about your experience working with **customers who speak little or no English**.

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

- ☐ Never – I don't interact with customers  
(SKIP TO END OF SURVEY)
- ☐ Once weekly
- ☐ Daily
- ☐ Once monthly
- ☐ Almost daily
- ☐ Rarely

## 4. 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.)
- ☐ Other (please specify): \_\_\_\_\_

**STOP: IF YOU RESPONDED "IN-PERSON" TO QUESTION 4, PLEASE PROCEED TO QUESTION 5.  
IF YOU DID NOT RESPOND "IN-PERSON" TO QUESTION 4, PLEASE PROCEED TO QUESTION 6.**

## 5. 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 a train – Which lines(s)?
- ☐ At a station or stop – Which one(s)?
- ☐ At the rail yard or bus divisions
- ☐ At an RTD office (e.g., Blake Street) / working from home
- ☐ At an RTD sales outlet (e.g., Civic Center Station)
- ☐ At a community event (e.g., resource fair, service change meetings) – Which one(s)?
- ☐ Other (please specify): \_\_\_\_\_

# RTD 2025-2028 Language Access Plan

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

- |   |  |
|---|--|
| <input type="checkbox"/> RTD fares                          | <input type="checkbox"/> Report a safety concern/crime   |
| <input type="checkbox"/> RTD schedules                      | <input type="checkbox"/> How to apply for discount programs                                      |
| <input type="checkbox"/> Directions/Trip planning           | <input type="checkbox"/> Language assistance services (e.g., translation, verbal interpretation) |
| <input type="checkbox"/> How to buy a ticket or pass        | <input type="checkbox"/> How to make a paratransit reservation                                   |
| <input type="checkbox"/> How to use ticket vending machines | <input type="checkbox"/> How to apply for a job  |
| <input type="checkbox"/> How to file a complaint            | <input type="checkbox"/> Other (please specify): _____   |

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

- |  |   |
|--|---|
| <input type="checkbox"/> Speak in their language with them (I am bilingual/multilingual) | <input type="checkbox"/> Use a translation app (e.g., Google Translate, Deepl, Microsoft Translator)              |
| <input type="checkbox"/> Direct them to interpretation via RTD Customer Care             | <input type="checkbox"/> Call a telephonic interpreter directly (e.g., LanguageLink, LanguageLine)                |
| <input type="checkbox"/> Ask multilingual coworkers to interpret (verbally translate)    | <input type="checkbox"/> Use body language (e.g., hand gestures) or simple words to try to communicate in English |
| <input type="checkbox"/> Ask other RTD customers to interpret                            | <input type="checkbox"/> Direct them to the RTD website/translation widget  |
| <input type="checkbox"/> Provide translated brochures                                    | <input type="checkbox"/> Other (please specify): _____  |
| <input type="checkbox"/> Direct them to informational signage (e.g., diagrams, maps)     |   |

**8. On a scale of 1 to 5, with 1 being not effective at all and 5 being very effective, rate how effective the following materials, services, or tools are to communicate with customers who speak little or no English. If you're not aware of or do not use a particular material, service or tool, please mark N/A.**

- |  |  |
|--|--|
| ___ Speaking in their language with them (I am bilingual/multilingual) | ___ Using a translation app (e.g., Google Translate, Deepl, Microsoft Translator)              |
| ___ Interpretation via RTD Customer Care                               | ___ Calling a telephonic interpreter directly (e.g., LanguageLink, LanguageLine)               |
| ___ Asking multilingual coworkers to interpret (verbally translate)    | ___ Using body language (e.g., hand gestures) or simple words to try to communicate in English |
| ___ Asking other RTD customers to interpret                            | ___ Directing them to the RTD website/translation widget                                       |
| ___ Providing translated brochures                                     | ___ Directing them to informational signage (e.g., diagrams, maps)                             |
|  | ___ Other (please specify): _____  |

**9. In general, how difficult/easy is it to communicate with customers who speak little or no English?**

- ☐ Very difficult      ☐ Somewhat difficult      ☐ Somewhat easy      ☐ Very easy

# RTD 2025-2028 Language Access Plan

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

- ☐ Not at all equipped    ☐ Somewhat unequipped    ☐ Somewhat equipped    ☐ Very equipped

## 11. What materials, services, or tools can RTD provide to improve communication with customers who speak little or no English? Select all that apply.

- ☐ Language classes – Which language(s)?
- ☐ Direct access to telephonic interpretation (note: interpretation is already available via Customer Care)
- ☐ Hire more bilingual/multilingual employees
- ☐ Translated materials/signage
- ☐ Translation devices
- ☐ Other (please specify): \_\_\_\_\_

## 12. Do you speak another language fluently besides English? Note: "Fluently" means you can speak or read in a language easily and quickly without difficulty or errors.

- ☐ Yes    ☐ No (SKIP TO QUESTION 16)    ☐ Not sure (SKIP TO QUESTION 16)

## 13. 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 (incl. Mandarin, Cantonese) | <input type="checkbox"/> Nepali  | <input type="checkbox"/> French  |  |

## 14. In general, about how often do you speak the language(s) selected in Question 14 with customers?

- |  |                                    |
|--|------------------------------------|
| <input type="radio"/> Never – I don't speak in another language with customers | <input type="radio"/> Once weekly  |
| <input type="radio"/> Daily  | <input type="radio"/> Once monthly |
| <input type="radio"/> Almost daily   | <input type="radio"/> Rarely       |

15. The Transit Equity Office plans to buy "I Speak \_\_\_\_" buttons to be optionally worn by frontline staff. The buttons can ease communication with customers and let customers know that you can help them in your shared language. It also recognizes and celebrates your multilingualism. The image to the right is an example (note: not the actual) of the I Speak buttons. **Would you like to have one of the pins in the language(s) you speak?**

- ☐ Yes  
☐ No



# RTD 2025-2028 Language Access Plan

**16. Please provide any suggestions you have to improve communication with linguistically diverse people below.**

**17. Are you a represented employee or non-represented employee?**

☐ Represented    ☐ Non-represented

**18. Please enter your RTD employee number (This is the number on your RTD badge.)** Represented staff must provide badge number to ensure you are paid for taking this survey. Survey responses are completely confidential.

Thank you for taking the time to complete this survey.



# RTD 2025-2028 Language Access Plan

## Appendix C: Employee Interaction Locations

Bus Routes	Count
<b>All Routes</b>	65
<b>15</b>	53
<b>0</b>	28
<b>16</b>	26
<b>40</b>	22
<b>11</b>	19
<b>51</b>	19
<b>43</b>	17
<b>19</b>	16
<b>121</b>	16
<b>Mall</b>	16
<b>31</b>	15
<b>FF1</b>	15
<b>SKIP</b>	13
<b>1</b>	12
<b>6</b>	11
<b>21</b>	11
<b>105</b>	11
<b>BOLT</b>	11
<b>7</b>	10
<b>8</b>	10
<b>28</b>	10
<b>65</b>	10
<b>153</b>	10

Stations or Stops	Count
Union Station	43
All Stations	33
Civic Center	14
Peoria	11
Central Park	10
Nine Mile	8
40th & Colorado	7
Colfax	7
Aurora Metro Center	6
Alameda	5
I12 & Broadway	5
Oak	5
Downtown Boulder	4
Englewood	4
Littleton-Mineral	4
Denver Airport	4
Decatur-Federal	3
Lafayette	3
N Line 124th Station	3
Ridgeway	3
Wagon Road	3

Rail Lines	Count
<b>N</b>	16
<b>All Rail Lines</b>	13
<b>A</b>	9
<b>R</b>	8
<b>H</b>	8
<b>D</b>	6
<b>W</b>	6
<b>E</b>	5
<b>G</b>	3
<b>L</b>	2
<b>B</b>	1

# RTD 2025-2028 Language Access Plan

## Appendix D: Language Access Survey (English Copy)

RTD's Civil Rights Division is conducting this survey to understand how important RTD services are to you and to find ways to make them more accessible for non-English speakers. **Complete the entire survey by January 31 to be entered into a drawing for one of 20 \$25 King Soopers gift cards!** The survey takes less than 8 minutes. It DOES NOT collect any contact information unless you wish to participate in the drawing for the gift cards.

To take this survey, you must be at least 18 years old OR under 18 but have parental consent to participate.

If you prefer to take the survey online, please go to [www.rtd-denver.com/LAPsurvey](http://www.rtd-denver.com/LAPsurvey) or scan this QR code.



**I certify that I am at least 18 years old or under 18 with parental consent to participate in this survey (initial here if you agree): \_\_\_\_\_**

**How well do you do each of the following? Mark an "X" where applicable.**

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

**What language(s) do you speak? (Select all that apply.)**

- |  |  |
|--|--|
| <input type="checkbox"/> English                 | <input type="checkbox"/> नेपाली (Nepali)               |
| <input type="checkbox"/> Español (Spanish)       | <input type="checkbox"/> አማርኛ (Amharic)                |
| <input type="checkbox"/> Tiếng Việt (Vietnamese) | <input type="checkbox"/> عربي (Arabic)                 |
| <input type="checkbox"/> 中文 (Chinese)            | <input type="checkbox"/> Français (French)             |
| <input type="checkbox"/> 한국어 (Korean)            | <input type="checkbox"/> 日本語 (Japanese)                |
| <input type="checkbox"/> Русский (Russian)       | <input type="checkbox"/> Other (please specify): _____ |

**How often do you use the following RTD services? Mark an "X" where applicable.**

	Daily	Almost daily	Once weekly	Once monthly	Rarely	Never
Buses						
Trains						
FlexRide						
Access-a-Ride or Access-on-Demand						

# RTD 2025-2028 Language Access Plan

## What prevents you from using RTD's public transit services more frequently? (Select up to three.)

- |   |  |
|---|--|
| <input type="checkbox"/> Nothing — I use RTD as much as I need                                | <input type="checkbox"/> It is not frequent enough or available when I need                            |
| <input type="checkbox"/> I cannot read or understand the information due to language barriers | <input type="checkbox"/> It is expensive   |
| <input type="checkbox"/> It doesn't go where I need to go                                     | <input type="checkbox"/> It is difficult for me to make multiple stops                                 |
| <input type="checkbox"/> It is slow   | <input type="checkbox"/> I travel with an individual who needs assistance (e.g., child or older adult) |
| <input type="checkbox"/> It is not reliable   | <input type="checkbox"/> Other (please specify): _____   |
| <input type="checkbox"/> It is not safe   |  |
| <input type="checkbox"/> It is too crowded  |  |

## Why do you use RTD's public transportation services? (Select all that apply.)

- |   |   |
|---|---|
| <input type="checkbox"/> I do not have access to a vehicle (e.g., car, van, motorcycle) | <input type="checkbox"/> To save money                                    |
| <input type="checkbox"/> I can't drive or have difficulties driving                     | <input type="checkbox"/> Transit is fastest and/or most convenient option |
| <input type="checkbox"/> I don't have a driver's license                                | <input type="checkbox"/> Employer or school helps me pay for transit      |
| <input type="checkbox"/> Can't get a ride from others/don't want to                     | <input type="checkbox"/> Better for the environment                       |
| <input type="checkbox"/> Avoid traffic and/or parking                                   | <input type="checkbox"/> Other (please specify): _____                    |

## How often do you have a household vehicle (e.g., car, van, motorcycle) available for your personal transportation needs?

- |                                 |                              |
|---------------------------------|------------------------------|
| <input type="radio"/> Always    | <input type="radio"/> Rarely |
| <input type="radio"/> Often     | <input type="radio"/> Never  |
| <input type="radio"/> Sometimes |                              |

## Where are you most often going when using RTD's services? (Select all that apply.)

- |   |  |
|---|--|
| <input type="checkbox"/> Work   | <input type="checkbox"/> Social or recreational activities (e.g., place of worship, club, play sports, dine out) |
| <input type="checkbox"/> School   | <input type="checkbox"/> Take a child or family member to a destination (e.g., school, medical appointments)     |
| <input type="checkbox"/> Run household errands (e.g., bank, groceries)                |  |
| <input type="checkbox"/> Attend special events (e.g., a concert)                      |  |
| <input type="checkbox"/> Medical, dental, mental or other health-related appointments |  |

## How do you get information about RTD's services? (Select all that apply.)

- ☐ RTD Customer Care at 303.299.6000 or via email
- ☐ RTD website ([www.rtd-denver.com](http://www.rtd-denver.com))
- ☐ RTD Next Ride trip planning app ([app.rtd-denver.com/nextride](http://app.rtd-denver.com/nextride))
- ☐ At an RTD sales outlet (e.g., Union Station, Civic Center Station)
- ☐ RTD's social media accounts (e.g., Facebook, Twitter, Instagram)
- ☐ Signs at bus/train stops
- ☐ Signs on board RTD buses/trains
- ☐ Local news (e.g., radio, website, newspaper)
- ☐ Word of mouth (e.g., family or friends)
- ☐ From a place of worship, community-based organization or social service
- ☐ I do not get information regarding RTD's services
- ☐ Other (please specify): \_\_\_\_\_

# RTD 2025-2028 Language Access Plan

Please rate how useful you think the following language assistance services would be, from *Not at all useful* to *Extremely useful*. Mark an "X" where applicable.

	Not at all useful	Slightly useful	Very useful	Extremely useful
Access to an interpreter (e.g., over the phone, in person)				
Translations of websites, apps and other <u>digital</u> tools				
Translated audio announcements on RTD vehicles (e.g., buses, trains)				
Translated audio announcements at stops/stations				
Translated signage on RTD vehicles (e.g., buses, trains)				
Translated signage at RTD stops/stations				
Translated brochures, flyers and other documents				
Bilingual/Multilingual staff (e.g., drivers, sales outlet staff)				

Please rate how important it is to get information about each of the following from RTD in your language(s), from *Not at all important* to *Extremely important*. Mark an "X" where applicable.

	Not at all Important	Slightly Important	Very Important	Extremely Important
RTD fares/How to buy an RTD ticket or pass				
RTD schedules				
Directions/Trip planning				
Service and schedule changes				
How to use RTD ticket vending machines				
How to file a complaint				
Report a safety concern/crime to RTD				
How to apply for RTD discounts				
How to access RTD language assistance (e.g., translation, verbal interpretation)				
RTD Access-a-Ride service for people with disabilities				
RTD FlexRide service				
How to apply for an RTD job				
How to attend RTD events				

# RTD 2025-2028 Language Access Plan

Do you know how to do the following? Mark an "X" under Yes or No.

	Yes	No
Find information on the cost of RTD fares		
Purchase an RTD ticket or pass		
Sign up for and use RTD MyRide		
Find information on schedules and service changes		
Use Next Ride for trip planning		
Make a <u>customer service</u> complaint to RTD		
Make a <u>civil rights/discrimination</u> complaint to RTD		
Apply for RTD discounts (e.g., LiVE income-based program, senior special discount)		
Report a safety concern/crime to RTD		
Access language assistance (e.g., translation, verbal interpretation)		
Become eligible for the Access-a-Ride paratransit service (for people with disabilities)		
Make an <u>Access-a-Ride</u> reservation		
Make a <u>FlexRide</u> reservation		
Contact RTD Customer Care		
Apply for an RTD job		
Attend RTD events		

Please enter your zip code: \_\_\_\_\_

What is your gender?

- ☐ Man
 ☐ Other (please specify): \_\_\_\_\_
- ☐ Woman
 ☐ Prefer not to say
- ☐ Non-binary or gender-diverse

How old are you?

- ☐ 19 or under
 ☐ 45-54
- ☐ 20-24
 ☐ 54-64
- ☐ 25-34
 ☐ 65 or older
- ☐ 35-44
 ☐ Prefer not to say

# RTD 2025-2028 Language Access Plan

Which of the following best describes your racial or ethnic origins? (Select all that apply.)

- |  |  |
|--|--|
| <input type="radio"/> Hispanic or Latino/a/e <ul style="list-style-type: none"><li><input type="radio"/> Mexican</li><li><input type="radio"/> Puerto Rican</li><li><input type="radio"/> Venezuelan</li><li><input type="radio"/> _____</li></ul> | <input type="radio"/> Native Hawaiian or Pacific Islander <ul style="list-style-type: none"><li><input type="radio"/> Native Hawaiian</li><li><input type="radio"/> Samoa</li><li><input type="radio"/> Chamorro</li><li><input type="radio"/> _____</li></ul> |
| <input type="radio"/> American Indian or Alaska Native <ul style="list-style-type: none"><li><input type="radio"/> Ute</li><li><input type="radio"/> Arapahoe</li><li><input type="radio"/> Cheyenne</li><li><input type="radio"/> _____</li></ul> | <input type="radio"/> Middle Eastern or North African <ul style="list-style-type: none"><li><input type="radio"/> Syria</li><li><input type="radio"/> Lebanon</li><li><input type="radio"/> Egypt</li><li><input type="radio"/> _____</li></ul>                |
| <input type="radio"/> Asian <ul style="list-style-type: none"><li><input type="radio"/> Chinese</li><li><input type="radio"/> Vietnamese</li><li><input type="radio"/> Indian</li><li><input type="radio"/> _____</li></ul>                        | <input type="radio"/> White <ul style="list-style-type: none"><li><input type="radio"/> German</li><li><input type="radio"/> French</li><li><input type="radio"/> Italian</li><li><input type="radio"/> _____</li></ul>  |
| <input type="radio"/> Black or African American <ul style="list-style-type: none"><li><input type="radio"/> Somali</li><li><input type="radio"/> Ethiopia</li><li><input type="radio"/> Jamaica</li><li><input type="radio"/> _____</li></ul>      | <input type="radio"/> Not listed here (Please specify):<br>_____   |
|  | <input type="radio"/> Prefer not to say  |

Please provide suggestions to improve the language accessibility of RTD's services and programs.

Thank you for completing our survey! **Enter your email or phone number for a chance to win one of 20 \$25 King Soopers gift cards. Must be 18 or older or have parental consent to participate. Please write clearly.**

We sincerely appreciate your time.



# RTD 2025-2028 Language Access Plan

## Appendix E: Examples of Translated Materials

Figure 8. Decal for Rail Vehicles Advertising Availability of Language Assistance



The decal is a red rectangular sign with white text and graphics. On the left, there is a graphic of two speech bubbles, one containing 'ABC' and the other containing the Chinese character '文'. Below the speech bubbles are two stylized human figures. To the right of the graphic, the text is organized into four quadrants, each with a heading in a different language: 'Hello' (English), 'Xin chào' (Vietnamese), 'Hola' (Spanish), and '你好' (Chinese). Each heading is followed by a paragraph of text explaining that language assistance is available at no cost and providing the phone number 303.299.6000. At the bottom left is a QR code, and at the bottom right is the RTD logo. In the center bottom, the website 'rtd-denver.com/language-access' and the phone number '303.299.6000' are displayed.

**Hello**  
Language assistance is available at no cost. Call 303.299.6000. For Spanish, press 2. For other languages, press 8. Then, tell the agent what language you speak and stay on the phone.

**Xin chào**  
Dịch vụ hỗ trợ ngôn ngữ được cung cấp miễn phí. Vui lòng gọi số 303.299.6000 và nhấn phím 8. Sau đó, cho nhân viên biết ngôn ngữ mà quý vị muốn nói và chờ máy.

**Hola**  
Se ofrece asistencia lingüística sin ningún costo. Llame al 303.299.6000. Oprima 2 y permanezca en la línea.

**你好**  
我们免费提供语言协助。请致电 303.299.6000，并按数字键 8。然后告诉接线员您会说的语言，并继续留在线上。

 [rtd-denver.com/language-access](https://rtd-denver.com/language-access) **303.299.6000** 

Figure 9. Title VI Bus Interior Card in Four Languages

### 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](mailto:titlevicomplaints@rtd-denver.com); or visit [rtd-denver.com/titlevi](https://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](mailto:titlevicomplaints@rtd-denver.com)；或访问[rtd-denver.com/titlevi](https://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](mailto:titlevicomplaints@rtd-denver.com); o visite [rtd-denver.com/titlevi](https://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](mailto:titlevicomplaints@rtd-denver.com); hoặc truy cập [rtd-denver.com/titlevi](https://rtd-denver.com/titlevi).



# RTD 2025-2028 Language Access Plan

Figure 10. Front Cover of RTD's Inaugural "I Speak" Card (8.5-by-11-Inch Version)

## Language Identification Card

### How to Use this Card

Use this card to identify the language spoken by a non-English-speaking customer. Show the customer the card and indicate that they should point to the language they speak. If you are unable to assist the customer in their preferred language using the options available to you, please have the customer call Customer Care at 303.299.6000 to access free interpretation services.

<b>Hablo español</b> I speak Spanish.	<b>Tôi nói tiếng Việt</b> I speak Vietnamese.	<b>我讲中文</b> I speak Chinese.
<b>አማርኛ እናገራለሁ</b> I speak Amharic.	<b>أنا أتحدث العربية</b> I speak Arabic.	<b>من به زبان فارسی صحبت می‌کنم</b> I speak Farsi.
<b>Je parle français</b> I speak French.	<b>Ich spreche Deutsch</b> I speak German.	<b>मैं हिंदी बोलते हूँ</b> I speak Hindi.
<b>Kuv hais lus Hmoob</b> I speak Hmong.	<b>私は日本語を話します</b> I speak Japanese.	<b>ខ្ញុំនិយាយខ្មែរ</b> I speak Khmer.
<b>저는 한국어를 합니다</b> I speak Korean.	<b>ຂ້ອຍປາກພາສາລາວ</b> I speak Laotian.	<b>म नेपाली बोलछु</b> I speak Nepali.
<b>Я говорю на русском языке</b> I speak Russian.	<b>Waxaan ku hadlaa SOOMAALI</b> I speak Somali.	<b>Mimi nasema Kiswahili</b> I speak Swahili.
<b>Tagalog ang wika ko</b> I speak Tagalog.	<b>నేను తెలుగు మాట్లాడతాను</b> I speak Telugu.	<b>ฉันพูดภาษาไทย</b> I speak Thai.

rtd-denver.com



# RTD 2025-2028 Language Access Plan

Figure 11. Proposed May 2025 Service Changes Rack Card



## Servicios

1, 9, 11, 12, 16, 19, 20, 24, 38, 42, 44, 45, 65, 66, 73, 93L, 121, 153, 169L, 225/225D, 228, 483, BOLT, DASH, JUMP, MetroRide, NB, P, SKIP, D, E, H, N, R, W

**Access-a-Ride:** Las rutas con mejoras o reducciones pueden afectar la disponibilidad del servicio de paratransito.



Escanee para obtener más información sobre los cambios propuestos y todas las formas de enviar sus comentarios.

[rtd-denver.com/service-changes](https://rtd-denver.com/service-changes)



303.299.6000 (TTY: 711)

2 para español  
8 for other languages





# RTD 2025-2028 Language Access Plan

Figure 12. Poster Advertising Language Access Survey in Nepali



तपाईं के सोच्नुहुन्छ हामीलाई भन्नुहोस्!  
\$25 को राजा सुपर्स उपहार  
कार्ड जित्न प्रविष्ट गर्नुहोस्।\*

## RTD को भाषा पहुँच सर्वेक्षण पूरा गर्नुहोस्

**किन:** हामी RTD का सार्वजनिक यातायात सेवाहरू तपाईंका लागि कतिको महत्वपूर्ण छन् भन्ने कुरा बुझ्न र गैर-अङ्ग्रेजी बोल्नेहरूका लागि तिनीहरूलाई थप पहुँचयोग्य बनाउने तरिकाहरू खोज्न चाहन्छौं।

**कहिले:** जनवरी ३१, २०२५ सम्म खुला छ

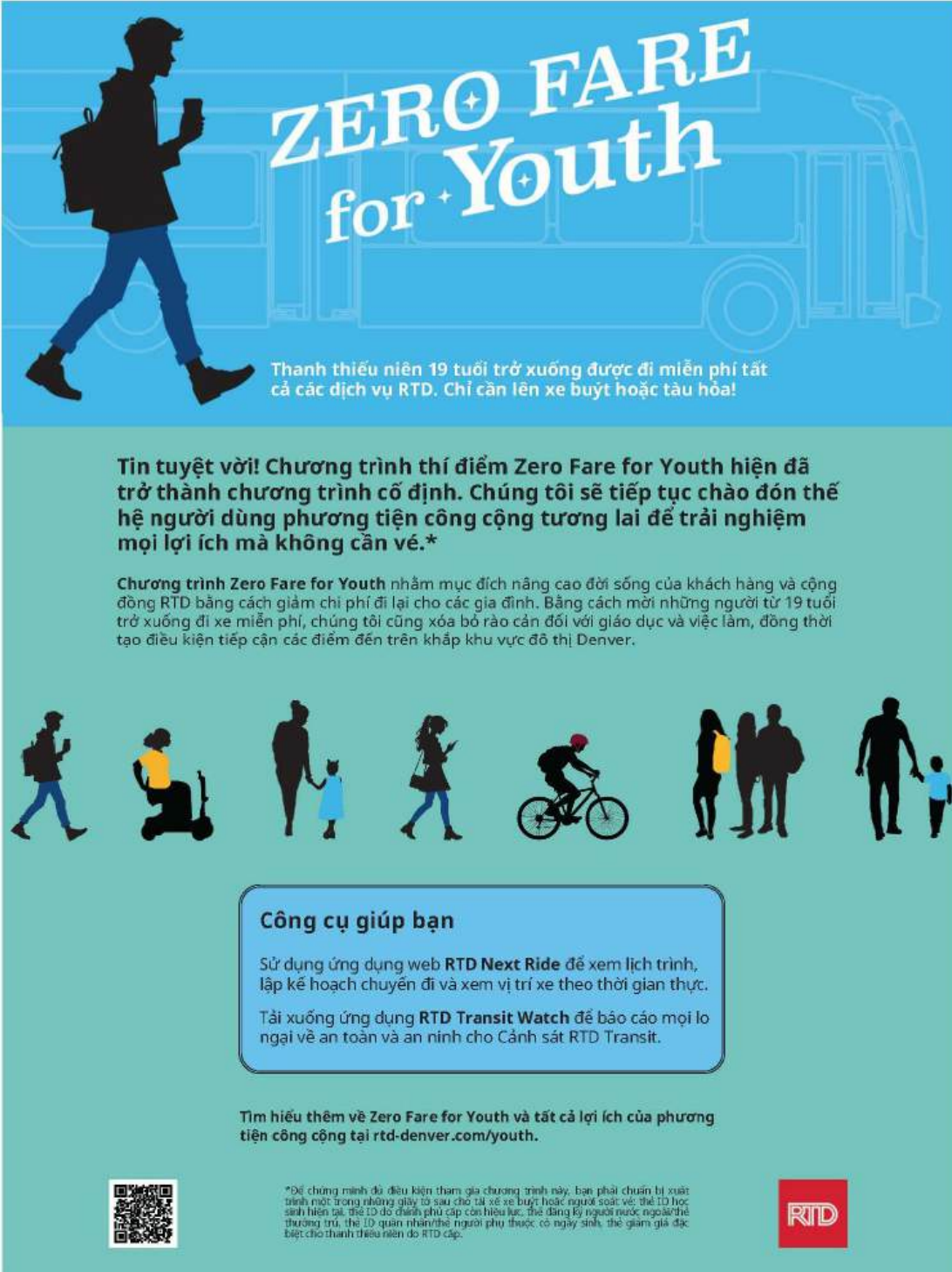
**कहाँ:** यसलाई अनलाइन [rtd-denver.com/LAPsurvey](https://rtd-denver.com/LAPsurvey) मा पूरा गर्नुहोस् वा कोड स्क्यान गर्नुहोस्।

\* कुल २० उपहार कार्डहरू वितरण गरिनेछ। प्रवेशका लागि योग्यहरूले जनवरी ३१, २०२५ सम्ममा सम्पूर्ण सर्वेक्षण पूरा गर्नुपर्छ।



# RTD 2025-2028 Language Access Plan

Figure 13. Zero Fare for Youth Program Fact Sheet in Vietnamese



**ZERO FARE  
for Youth**

Thanh thiếu niên 19 tuổi trở xuống được đi miễn phí tất cả các dịch vụ RTD. Chỉ cần lên xe buýt hoặc tàu hỏa!

**Tin tuyệt vời! Chương trình thí điểm Zero Fare for Youth hiện đã trở thành chương trình cố định. Chúng tôi sẽ tiếp tục chào đón thế hệ người dùng phương tiện công cộng tương lai để trải nghiệm mọi lợi ích mà không cần vé.\***


Chương trình Zero Fare for Youth nhằm mục đích nâng cao đời sống của khách hàng và cộng đồng RTD bằng cách giảm chi phí đi lại cho các gia đình. Bằng cách mời những người từ 19 tuổi trở xuống đi xe miễn phí, chúng tôi cũng xóa bỏ rào cản đối với giáo dục và việc làm, đồng thời tạo điều kiện tiếp cận các điểm đến trên khắp khu vực đô thị Denver.

**Công cụ giúp bạn**


Sử dụng ứng dụng web **RTD Next Ride** để xem lịch trình, lập kế hoạch chuyến đi và xem vị trí xe theo thời gian thực.

Tải xuống ứng dụng **RTD Transit Watch** để báo cáo mọi lo ngại về an toàn và an ninh cho Cảnh sát RTD Transit.

Tìm hiểu thêm về Zero Fare for Youth và tất cả lợi ích của phương tiện công cộng tại [rtd-denver.com/youth](https://rtd-denver.com/youth).



\*Để chứng minh đủ điều kiện tham gia chương trình này, bạn phải chuẩn bị xuất trình một trong những giấy tờ sau cho tài xế xe buýt hoặc người soát vé: thẻ ID học sinh hiện tại, thẻ ID do chính phủ cấp còn hiệu lực, thẻ đăng ký người nước ngoài/thẻ thường trú, thẻ ID quân nhân/thẻ người phụ thuộc có ngày sinh, thẻ giám giá đặc biệt cho thanh thiếu niên do RTD cấp.



# **RTD 2025-2028 Language Access Plan**

## **Appendix F: Website and Next Ride Translated Sessions (2024)**



## Website: Translated Sessions

### Spanish Español

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
10,871	11,046	11,478	11,589	13,360	13,770	21,333	34,201	32,079	29,985	22,205	21,952	233,869

### Chinese 中文

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
937	1,089	1,084	1,085	1,245	1,766	2,622	3,905	3,081	2,597	2,247	2,034	23,692

### Vietnamese Tiếng Việt

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
---	77	135	251	89	141	108	319	310	209	179	168	1,986

Launched: February 2024

### Russian Русский

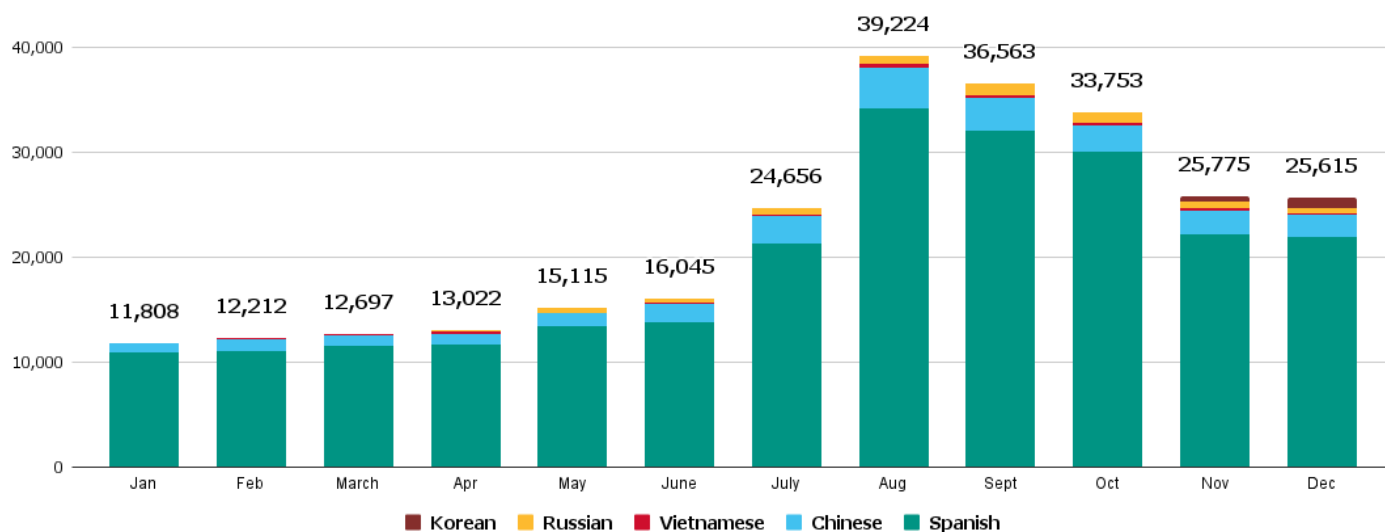
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
---	---	---	97	421	368	593	799	1093	962	704	489	5,526

Launched: April 2024

### Korean 한국어

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
---	---	---	---	---	---	---	---	---	---	440	972	1,412

Launched: November 2024



## Next Ride Application: Translated Sessions

### Spanish Español

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
15,148	18,153	19,011	20,407	18,821	14,819	14,833	18,058	14,548	13,804	12,125	12,247	191,974

### Chinese 中文

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
676	887	1,058	657	1,159	1,077	977	868	593	768	554	2,990	12,264

### Vietnamese Tiếng Việt

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
---	---	17	351	122	253	112	153	548	778	426	365	3,125

Launched: February 2024

### Russian Русский

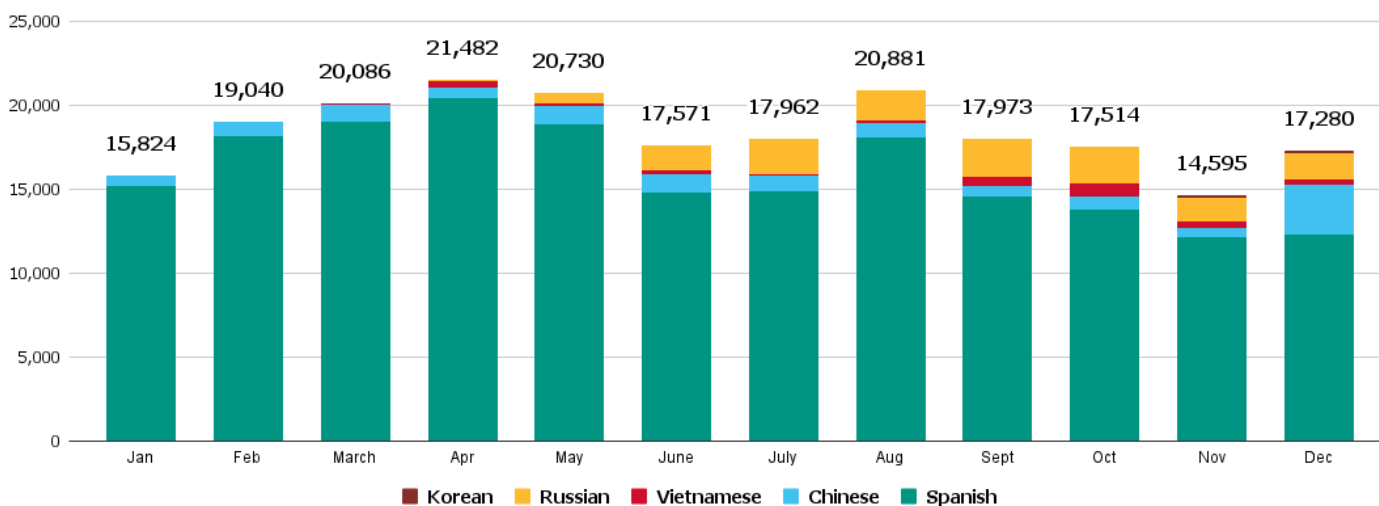
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
---	---	---	67	628	1,422	2,040	1,802	2,284	2,164	1,408	1,505	13,320

Launched: April 2024

### Korean 한국어

Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
---	---	---	---	---	---	---	---	---	---	82	173	255

Launched: November 2024



# **RTD 2025-2028 Language Access Plan**

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## **Appendix G: Copy of Serving Non-English-Speaking Customers Training Slide Deck**



**We Make Lives Better  
Through Connections.**

---

# **Serving Non-English-Speaking Customers**

**Transit Equity Office**  
Civil Rights Division



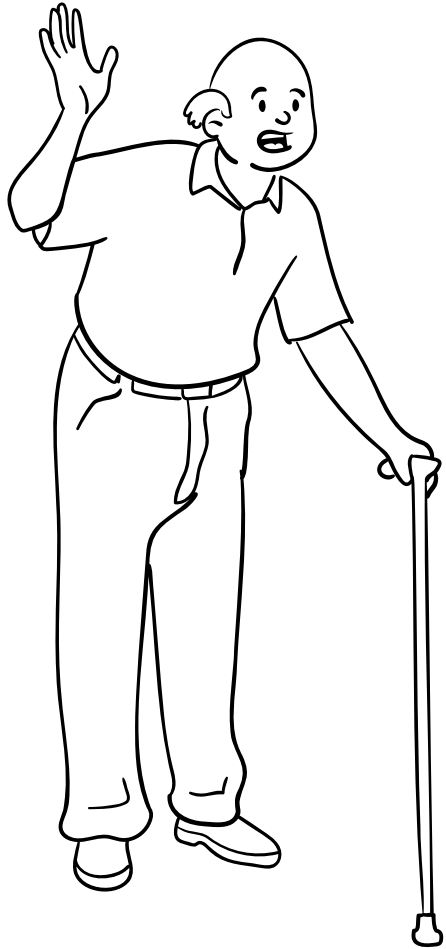
# Pair-and-Share

---

- Have you ever experienced a language/communication barrier with another person or other people?
- What was the situation?
- What was the experience like, and how did it feel?
- Were you able to successfully communicate with the other person/people? If so, how?

# Learning Objectives

---



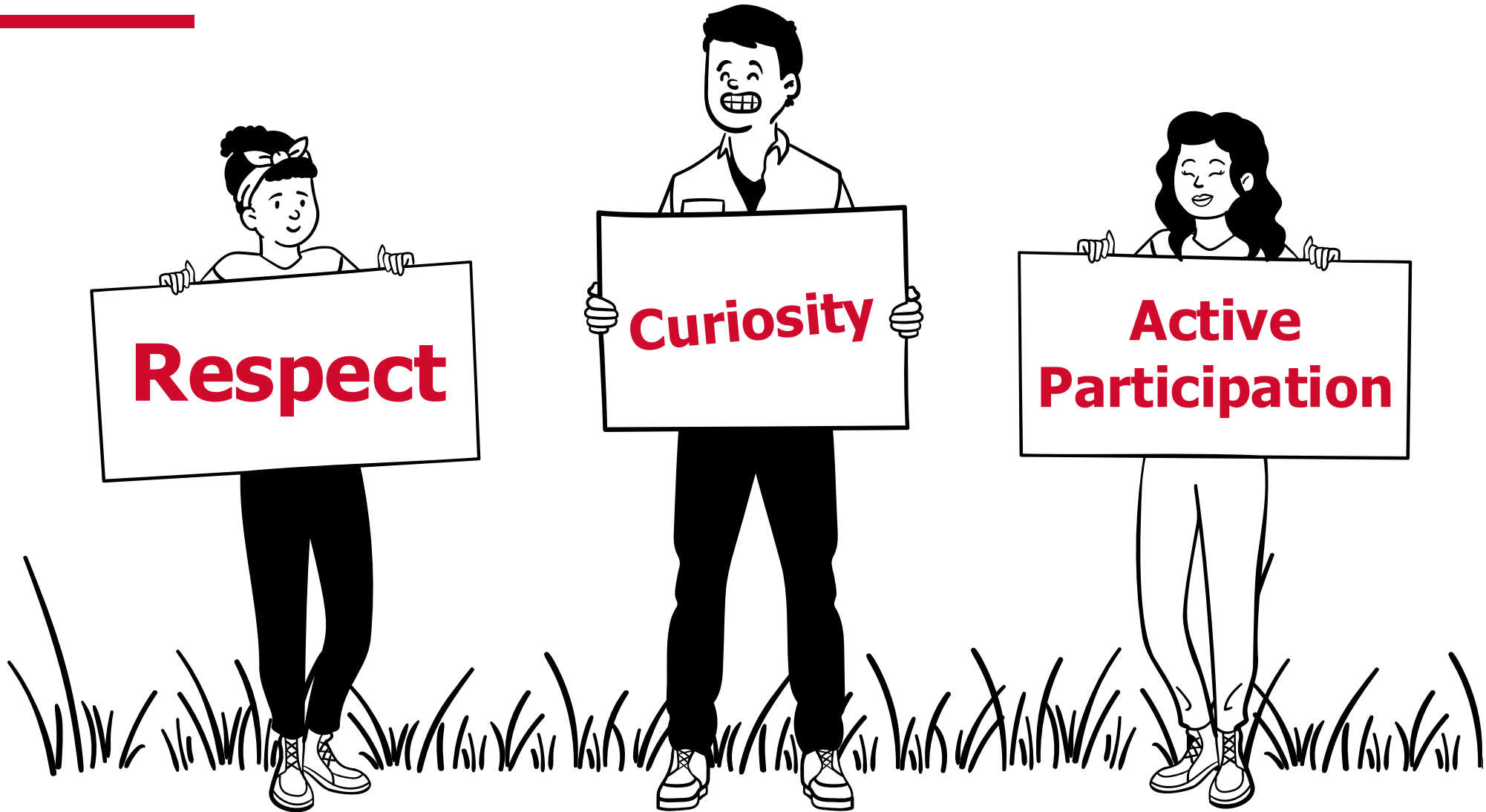
1. Recognize the importance of Title VI protections for non-English-speaking customers
2. Apply verbal and nonverbal communication strategies to effectively interact with people from diverse cultural backgrounds
3. Demonstrate use of language assistance tools and techniques to communicate with non-English-speaking customers





# Training Expectations

---





# **Title VI and Non-English-Speaking Customers**

# Top Languages in Service Area (US Census)

---

- The total number of non-English speakers in the Denver metro area is approximately 206,254, or 6.7% of 3.1 million people (or 1 in every 15 people)

**1**

**Spanish**

**2**

**Vietnamese**

**3**

**Chinese**

**4**

**Russian**

**5**

**Korean**



And 16 more  
"safe harbor"  
languages!

# Who are “Non-English Speakers?”

- The U.S. Census describes “limited English proficient” (LEP) persons as those who speak English “less than very well”
- A customer may be non-English-speaking if:
  - English is not their primary language
  - They cannot read, speak, write or understand English
  - Their language status **poses barriers**
- Non-English-speaking customers can be anybody!
  - Foreign-born or U.S. citizens
  - Tourists or other international businesspeople
  - Refugees, immigrants or asylum seekers



# Why the Focus on English Proficiency?

---



- RTD receives funds from the Federal Transit Administration
- This requires us to comply with Civil Rights law, including Title VI of the Civil Rights Act of 1964 ("Title VI")
- Title VI **prohibits discrimination on the basis of race, color or national origin**
- Lau v. Nichols of 1974: national origin includes language
- RTD must **ensure that non-English speakers can access programs and services**

# Why is Compliance Important?

## ■ Violation of Title VI can result in:

- Legal consequences
- Loss of federal funding
- Negative impact on RTD's public image
- Decrease in customer satisfaction
- Loss of employee morale

Remember: to be compliant with federal law, RTD must take reasonable steps to provide meaningful access to non-English-speaking customers.





# It's Not Just Compliance...It's the Right Thing to Do!

---



# Knowledge Check

---

- True or false: Title VI requires recipients of federal fund to provide non-English-speaking customers with meaningful access to their programs and services.
  - A. True
  - B. False
  
- Title VI prohibits discrimination on the basis of:
  - A. Race, sex and disability
  - B. Race, color and national origin
  - C. National origin, sex and disability
  - D. Disability, color and national origin



# Cross-Cultural Communication

# Staff, Contractors and Customers are a Mix of Cultures

---





# Pair-and-Share

---

- Introduce yourself (where you were born, what you like to do, whatever you'd like!)
- What's a part of your culture that is important to you?
- Examples: a holiday, ritual or tradition; dish; clothing item or hairstyle



# Case Study: Doing Business in Japan

---



Stop video at 3:18



# Ineffective Cross-Cultural Communication Can...

---

- Create discomfort
- Lead to misunderstandings
- Be disrespectful (even if unintentional)
- Produce hostility/conflict
- Can be perceived as discriminatory



# Effective Cross-Cultural Communication Can...

---

- Help you learn about your own and others' cultural backgrounds
- Foster mutual understanding and respect
- Contribute to an inclusive RTD environment
- Help customers better use our services





# Cross-Cultural Communication Skills



# Practice Active Listening

---

- Listen to understand, not to respond
- Be fully present
- Practice good eye contact if appropriate
- Paraphrase and reflect back what has been said

# Use Simple Words and Avoid Slang or Jargon

---

- "Local fare costs three bucks."
- "It's raining cats and dogs!"
- "Break a leg!"
- "Don't beat around the bush."



- "Local fare costs three dollars."
- "It's raining a lot!"
- "Good luck!"
- "Get to the point."



# Use Body Language (but Avoid Some Gestures)

---

- Use facial expressions (e.g., smile, frown) — facial expressions are almost all universal!



- Avoid these hand gestures, which are rude or obscene in many cultures:



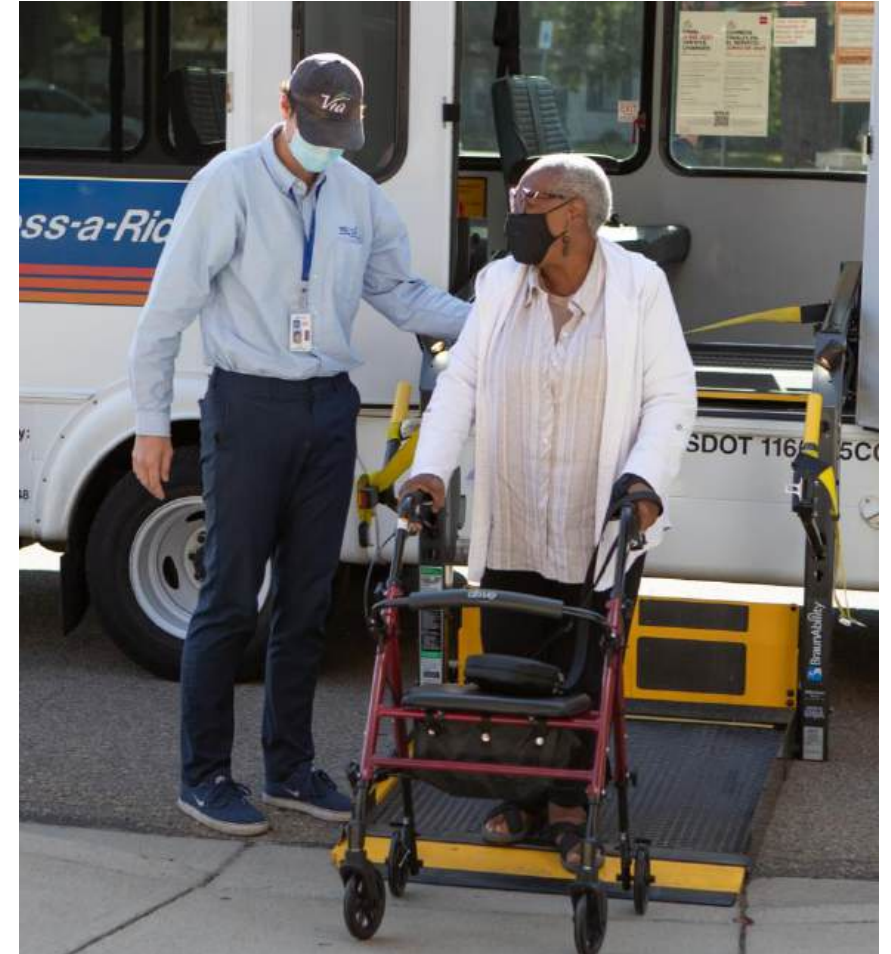
- Avoid pointing. Instead, extend your right arm out with an open palm



# Respect Others' Personal Space

---

- Some cultures prefer closer physical contact where others prefer more distant physical contact
- The “personal space bubble” is influenced by the relationship with the other person (e.g., are they a friend or stranger?) as well as gender
- Generally, keep a minimum distance of 3-4 feet when possible and avoid touching them (or their mobility device) without permission
- Watch for non-verbal cues (e.g., shifting away)



# Knowledge Check

---

- True or false: Body language is universal.

A. True

B. False

- True or false: To be an effective cross-cultural communicator, you must know *everything* about everyone else's cultures.

A. True

B. False



# Language Assistance Tools and Techniques

# Case Study: MTA Bus Operator

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# Never Demand that Someone Speak English

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✗ **"You speak (any) English?"**

If someone speaks to you in another language, assume they don't speak English. Asking can be condescending (but tone is important!).

✗ **"This is America! Speak English!"**

English is not a requirement to access RTD services.

✗ **"You want me to help you? Gotta speak English."**

Title VI requires RTD staff to provide customers with equal access to services regardless of their preferred language.

# Try English First — with Different Approaches

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- Use body language and other general cross-cultural communication skills
- Speak slowly and avoid raising your voice
- Use fewer or more simple words
- Point to signs and documents where available
- Count with your fingers to convey numbers
- Write it down, as reading may be easier than listening



# Identify the Customer's Preferred Language

- If you do not recognize the language, ask:
  - "Would you prefer English or a different language?"
  - "What language do you speak?"
- Gesturing to your mouth may help
- If in person, use the "I Speak" card (screenshot to the right)
  - Printed version is only available to certain roles
  - Digital version is available to RTD staff [on the Hub](#) (if you are contracted without access to the Hub, please contact your trainer for access)



# Ask a Coworker for Help

Top languages spoken as a percentage of multilingual staff:

1. Spanish, 53%
2. Amharic, 13%
3. French, 7%
4. Arabic, 7%
5. Oromo, 4%
6. Swahili, 3%
7. Italian, 3%
8. Nepali, 3%
9. German, 2%

**30%** (almost **1 in 3**) respondents to a 2024 staff survey speak a language other than English fluently.

Most bilingual staff speak English and Spanish.



# Ask Another Customer for Help

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- Ask someone in the vehicle, **“Is there anyone here that can speak [language]?”**
- Use your judgment: a customer may say they speak a different language, but that does not mean they are a reliable interpreter!
- Avoid asking anyone under the age of 18 to act as an interpreter except for simple topics (e.g., ticket purchase, route schedule) or if urgent (e.g., medical emergency)
  - You may also ask the child to tell the accompanying adult that interpretation is available at no cost by calling Customer Care at 303.299.6000
  - If a crime has taken place, responding law enforcement should provide an interpreter

# Use Your Smartphone

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- **Per RTD policy, do not use a phone when operating a vehicle!**
- If not operating a vehicle, use [Google Translate](#) on your phone's web browser



- Consider downloading a live translation app such as [Google Translate](#), [Microsoft Translator](#) or [DeepL](#) directly on your phone for quick access and offline translations



- Alternatively, be receptive to a customer using their smartphone to communicate with you

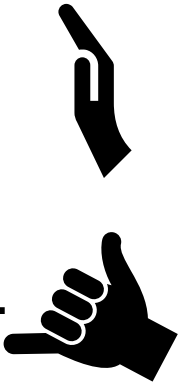


# Connect the Customer to Customer Care

- The customer can access **interpretation services at no cost** via Customer Care: 303.299.6000
- Write the phone number down or point to signage with the phone number listed *and* say it out loud
- **For Spanish**, the customer presses 2 and connects with an RTD's bilingual information specialist
- **For 300+ other languages**, information specialists will connect to interpretation services
- If the customer seems abnormally stressed, scared, faint or confused, it could be an emergency; follow normal emergency procedures

## Pro Tip:

Make one of these phone call hand gestures next to your face, imitating a phone.



# Language Assistance Interior Card



## Hello

Language assistance is available at no cost. Call 303.299.6000. For Spanish, press 2. For other languages, tell the agent what language you speak and stay on the phone.

## Hola

Se ofrece asistencia de idiomas sin ningún costo. Llame al 303.299.6000. Oprima 2 y permanezca en la línea.



[rtd-denver.com/language-access](http://rtd-denver.com/language-access)

## Xin chào

Có hỗ trợ ngôn ngữ miễn phí. Gọi 303.299.6000. Xin vui lòng cho nhân viên biết ngôn ngữ của quý vị và giữ máy để duy trì cuộc gọi.

## 你好

免费提供语言协助。请致电303.299.6000。请告诉工作人员您说的语言，不要挂断电话。

**303.299.6000**





# Knowledge Check

---

- True or false: I can refuse to help or offer services to someone who doesn't speak English with me.
  - A. True
  - B. False
  
- Which of the following are ways that you can help a non-English-speaking customer?
  - A. Use Google Translate on your phone while operating the vehicle
  - B. Ask an intoxicated customer to interpret for a monolingual customer
  - C. Speak really loudly
  - D. Connect the Customer to free interpretation services via Customer Care

# You Did It!

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You should now be able to...

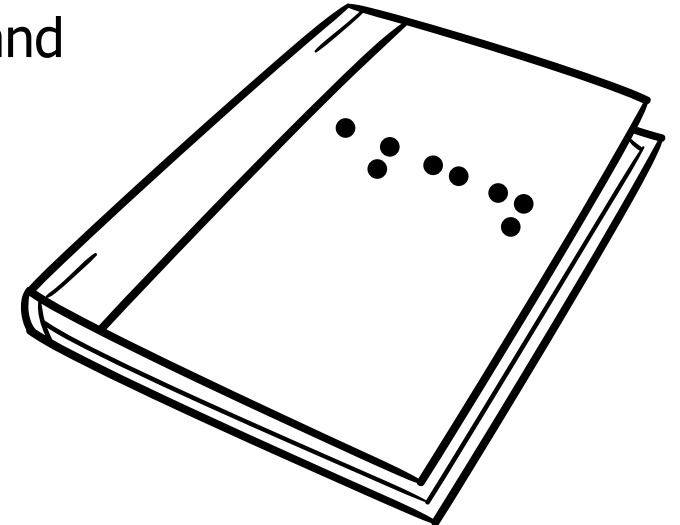
1. Recognize the importance of Title VI protections for non-English-speaking customers
2. Apply verbal and nonverbal communication strategies to effectively interact with people from diverse cultural backgrounds
3. Demonstrate use of language assistance tools and techniques to communicate with non-English-speaking customers



# Language Access Program

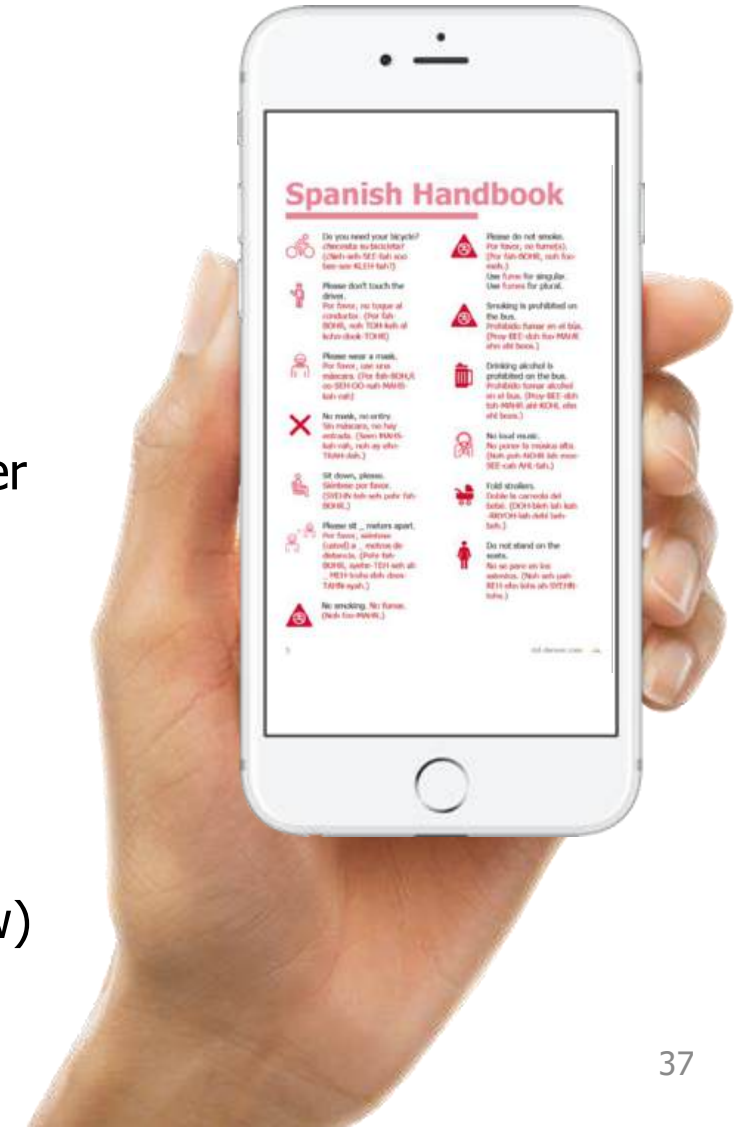
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- [Language Access Program](#) was established in 2023 to help RTD better serve non-English-speaking customers
  
- Key activities
  - Strategy for document and signage translation
  - Training staff and contractors, producing helpful resources and monitoring compliance
  - Expanding engagement with immigrant and refugee communities



# Language Access Resources

- The Hub → Civil Rights → [Transit Equity Office](#) (scroll down)
  - Best Practices: Serving Non-English-Speaking Customers
  - Best Practices: Working with an Interpreter
  - “I Speak” Card to identify a customer’s preferred language
  - *Basic Spanish for RTD Employees* Digital Handbook
- If you are contracted staff without Hub access, contact your trainer for resources
- RTD website ([rtd-denver.com](http://rtd-denver.com))
  - [RTD basic rider information](#) in 10 safe harbor languages
  - New website will offer translations, and people can translate website already using their browser (e.g., Firefox)
  - [Next Ride App](#) in Spanish, Chinese (more languages to follow)
  - [Language Access Plan 2022-2025](#)



# Questions?



And please take  
our 2-minute  
post-training  
survey!

Serving Non-English-Speaking  
Customers Training Feedback



# We Make Lives Better Through Connections.

---

**Dani McLean** (she/her/hers)

Transit Equity Specialist

Civil Rights Division

[Dani.McLean@rtd-denver.com](mailto:Dani.McLean@rtd-denver.com)

**Martin Romero** (he/him/his)

Transit Equity Manager

Civil Rights Division

[Martin.Romero@rtd-denver.com](mailto:Martin.Romero@rtd-denver.com)

[rtd-denver.com](http://rtd-denver.com)





# **RTD 2025-2028 Title VI Program**

## **Attachment G: Subrecipient Compliance Guide**

DRAFT



# **Subrecipient Title VI Compliance Guide**

**Prepared by RTD's Transit Equity Office  
Updated January 2025**

# Title VI Subrecipient Compliance Guide

## Table of Contents

Background .....2

*Title VI and Environmental Justice* ..... 2

*Subrecipients* ..... 2

Title VI Program .....3

*Title VI Policy Statement*..... 3

*Title VI Complaint Form, Complaint Procedures and Public Notice* ..... 3

        Complaint Log Example .....4

*Public Participation Plan*..... 4

*Language Access Plan* ..... 4

*Inclusive Advisory and Planning Boards* ..... 5

*Determining Site or Location of a Facility*..... 5

Other Requirements .....6

*Title VI Coordinator*..... 6

*Requirement to Provide Additional Information* ..... 6

Technical Assistance .....6

Title VI Program Checklist .....7

# Title VI Subrecipient Compliance Guide

## Background

### Title VI and Environmental Justice

Equity is central to the mission of the Regional Transportation District (RTD) to provide mass transit services in the Denver Metro Area. An equitable system ensures fair distribution of the benefits and burdens of transit service, regardless of race, color, national origin, or income level.

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's) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI and Executive Order 12898. In this circular, the FTA requires that RTD document the 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 that organization (e.g. federal grants, loans, real estate). Under federal Title VI regulations, primary recipients are responsible for ensuring their subrecipients comply with these requirements. Noncompliance by an RTD subrecipient also places RTD in violation of Title VI.

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 Subrecipient Compliance Guide

## Title VI Program

Subrecipients must submit a Title VI Program to RTD, outlining the scope of their federally funded program, project, or activity and detailing how they will ensure compliance with nondiscrimination requirements. Subrecipients must demonstrate compliance with DOT's Title VI regulations by providing documentation, including records and reports, within their Title VI Programs.

**RTD encourages subrecipients to adopt our notice to beneficiaries, complaint procedures and complaint forms, Public Participation Plan and Language Access 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 1 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 within the Title VI Program.

### Title VI Complaint 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.

# Title VI Subrecipient Compliance Guide

## Complaint Log Example

No.	Investigation/ Lawsuits/ Complaint	Title VI Basis	Complaint Method	Receipt Date	Status	Outcome
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) (e.g., reception desk, meeting rooms).

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 to request additional information on the subrecipient's Title VI obligations
3. A description of the procedures that members of the public shall follow **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 assess needs with each subrecipient during the initial intake and provide any supporting documents.

## Public Participation Plan

Subrecipients must create a Public Participation Plan demonstrating how they intend to authentically engage low-income and Black, Indigenous, and People of Color (BIPOC) populations<sup>1</sup> 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 assess needs with each subrecipient during the initial intake and provide any supporting documents.

## Language Access Plan

To ensure beneficiaries can access benefits, services, information, and "vital" materials, subrecipients must develop a Language Access Plan for individuals with limited English proficiency (LEP; hereafter referred to as linguistically diverse persons). Failing to provide language assistance may result in national origin discrimination. Subrecipients can do this by conducting a Four Factor Analysis. An FTA requirement, the Analysis will assist in

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<sup>1</sup> RTD uses the term BIPOC as a more inclusive replacement for "minority."



# Title VI Subrecipient Compliance Guide

determining what specific language assistance measures would be appropriate and/or required to provide. Specifically, the Four Factor Analysis is an individualized assessment that balances the following four factors:

1. Identify the number and proportion of linguistically diverse persons likely to be encountered by the subrecipient
2. Determine the frequency of contact with which linguistically diverse persons encounter the subrecipient
3. Determine the nature and importance of the program, activity and/or service provided
4. Identify the resources available to the subrecipient and the costs

Additionally, the Safe Harbor Provision and threshold assists agencies with determining when it is necessary to translate vital materials. DOT adopted the Department of Justice's (DOJ's) Safe Harbor Provision which stipulates that, a recipient should provide written translation of vital materials for each eligible 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 their services.

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

To the extent that it is appropriate, RTD encourages subrecipients to adopt RTD's Language Access Plan. RTD will assess this need 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:

- Include a table showing the racial composition of committee members
- Detail efforts to encourage minority participation in such committees or councils
- Use self-reported data to determine racial composition (avoid assumptions)

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 and operations centers. To comply with Title VI:

- Subrecipients shall 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. 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.
- When evaluating locations of facilities, subrecipients 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.
- 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

# Title VI Subrecipient Compliance Guide

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 to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have a lesser 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 serving 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 which is required by this guide from a subrecipient to investigate complaints of discrimination or to resolve concerns about possible non-compliance 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 the Transit Equity Office in RTD's Civil Rights Division.

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](mailto:dani.mclean@rtd-denver.com)

Martin Romero, Transit Equity Manager  
303.229.2370  
[martin.romero@rtd-denver.com](mailto:martin.romero@rtd-denver.com)

# Title VI Subrecipient Compliance Guide

## 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. You can find the policy statement on the last page of this document.
- ☐ **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 and 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 BIPOC and linguistically diverse 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 BIPOC 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 Access Plan:** A copy of the subrecipient's plan for providing language assistance to linguistically diverse, 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:
  - Include a table showing the racial composition of committee members
  - Detail efforts to encourage minority participation in such committees or councils
  - Use self-reported data to determine racial composition (avoid assumptions)
- ☐ **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 or other facility, the subrecipient shall include a copy of the Title VI facility siting equity analysis conducted during the planning stage regarding the location of the facility.

# **RTD 2025-2028 Title VI Program**

## **Attachment H: Smart Commute Metro North Concurrence Letter**

DRAFT

March 15, 2024

**Jeanne Shreve**

144th Flex Shuttle & eBike Programs Manager

[smartcommute.org](https://smartcommute.org)

[jeanne@smartcommute.org](mailto:jeanne@smartcommute.org)

Subject: Title VI Plan and Compliance

Dear Jeanne Shreve,

This letter is to confirm receipt of Smart Commute Metro North's documentation related to Title VI compliance. This submission is required pursuant to Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," dated October 1, 2012.

The Transit Equity Office has reviewed the following documents and determined that they meet the requirements of the FTA Circular and RTD's Title VI Program:

- 2022 and 2023 Annual Title VI Reports
- 2022 and 2023 Title VI Policy Statements
- 2024 Updated Title VI Plan

The Transit Equity Office requests that Smart Commute Metro North submit a signed Title VI Policy Statement and the prior calendar year's Title VI report annually, every January, for RTD's review. Based on the data provided, RTD may request supplemental information.

If Smart Commute Metro North experiences any significant changes related to Title VI requirements, it must submit relevant updates to RTD to review for concurrence. Additionally, RTD reserves the right to perform audits of Smart Commute Metro North's Title VI-related documents, policies and procedures as needed.

Thank you for your cooperation in this matter. Should you need assistance or if you have any questions, please contact me at [Dani.McLean@rtd-denver.com](mailto:Dani.McLean@rtd-denver.com) or at 303.299.2051.

Sincerely,

Dani McLean

Transit Equity Specialist

# **RTD 2025-2028 Title VI Program**

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## **Attachment I: Smart Commute Metro North Signed Title VI Policy Statement**

DRAFT



# 2023 Title VI Policy Statement

Smart Commute Metro North 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.

\_\_\_\_\_ 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

# **RTD 2025-2028 Title VI Program**

## **Attachment J: Allied Universal Title VI Concurrence Letter**

DRAFT

**August 14, 2024**

To: Melinda Bishop, Director, Human Resources Policy  
Edward Fiocchi, RTD Security Account Manager  
Scott Kelm, Captain, Allied Universal RTD Contract  
Michael Pierce, Commander, Allied Universal RTD Account  
Liam Pruett, Regional Human Resources Manager

**Subject: Contractor Title VI Compliance Review**

Dear Allied Universal,

This letter confirms receipt of Allied Universal's Title VI and Americans with Disabilities Act (ADA) documentation related to compliance with Title VI of the Civil Rights Act of 1964, Titles II and III of the ADA, and the Federal Transit Administration (FTA) Circulars 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, and 4710.1, Americans with Disabilities Act (ADA) Guidance.

The Transit Equity Office and the American with Disabilities Act Office have reviewed the following documents and determined that they meet the requirements outlined in the FTA Circular and RTD's Title VI Program:

- Complaint Management Procedures and Reporting
- Training and Staff Resources
  - Civil Rights & Public Accommodations— Nondiscrimination Requirements
  - Serving Non-English-Speaking Customers
  - Serving Customers with Disabilities

To ensure ongoing compliance, RTD will conduct periodic reviews and request that Allied Universal submit the required documents listed above, along with training completion records for all relevant trainings. Additionally, RTD reserves the right to audit Transdev's Title VI-related documents and ADA-related documents, policies, and procedures as needed.

If Allied Universal makes any significant changes to its compliance documents or trainings reviewed, it must promptly submit updates to RTD for review and approval.

Thank you for your cooperation. For ADA-related questions, please contact Gabe Christie. For Title VI-related inquiries, please reach out to Martin Romero.

Gabe Christie  
Manager, ADA  
Civil Rights Division  
gabe.christie@rtd-denver.com



Martin Romero  
Manager, Transit Equity  
Civil Rights Division  
martin.romero@rtd-denver.com



# **RTD 2025-2028 Title VI Program**

## **Attachment K: Denver Transit Partners Title VI Concurrence Letter**

DRAFT

September 13, 2024

To: Vanessa Jernigan, HR Manager  
Paul Kenney, General Manager  
Nate Morgan, Denver Transit Partners  
Dina Salama, Chief Financial Officer  
Eric Weber, Deputy General Manager, Operations

**Subject: Contractor Title VI Compliance Review**

Dear Denver Transit Partners and Denver Transit Operators (DTO/DTP),

This letter confirms receipt of DTO/DTP's Title VI and Americans with Disabilities Act (ADA) documentation related to compliance with Title VI of the Civil Rights Act of 1964, Titles II and III of the ADA, and the Federal Transit Administration (FTA) Circulars 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, and 4710.1, Americans with Disabilities Act (ADA): Guidance.

The Transit Equity Office and the American with Disabilities Act Office have reviewed the following documents and determined that they meet the requirements outlined in the FTA Circular and RTD's Title VI Program:

- Complaint Management Procedures and Reporting
- Training and Staff Resources
  - Civil Rights & Public Accommodations — Nondiscrimination Requirements
  - Serving Non-English-Speaking Customers
  - Serving Customers with Disabilities

To ensure ongoing compliance, RTD will conduct periodic reviews and request that DTO/DTP submit the required documents listed above, along with training completion records for all relevant trainings. Additionally, RTD reserves the right to audit Transdev's Title VI-related documents and ADA-related documents, policies, and procedures as needed.

If DTO/DTP makes any significant changes to its compliance documents or trainings reviewed, it must promptly submit updates to RTD for review and approval.

Thank you for your cooperation. For ADA-related questions, please contact Gabe Christie. For Title VI-related inquiries, please reach out to Martin Romero.

Gabe Christie  
Manager, ADA  
Civil Rights Division  
gabe.christie@rtd-denver.com



Martin Romero  
Manager, Transit Equity  
Civil Rights Division  
martin.romero@rtd-denver.com



Regional Transportation District  
1660 Blake Street, Denver CO 80202

# **RTD 2025-2028 Title VI Program**

## **Attachment L: Transdev Title VI Concurrence Letter**

DRAFT



**August 23, 2024**

To: Sarah Meredith, General Manager, Paratransit, Transdev  
Marcellinus Andrew, General Manager, Call Center  
Travis Menefee, General Manager, Non-dedicated Paratransit  
Alexander Brink, General Manager, Commerce City  
Cynthia Menge, General Manager, Broadway  
Michael Neisser, General Manager, Longmont  
Saidel Sobrevilla, General Manager, Englewood

**Subject: Contractor Title VI Compliance Review**

Dear Transdev,

This letter confirms receipt of Transdev's Title VI and Americans with Disabilities Act (ADA) documentation related to compliance with Title VI of the Civil Rights Act of 1964, Titles II and III of the ADA, and the Federal Transit Administration (FTA) Circulars 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, and 4710.1, Americans with Disabilities Act (ADA): Guidance.

The Transit Equity Office and the American with Disabilities Act Office have reviewed the following documents and determined that they meet the requirements outlined in the FTA Circular and RTD's Title VI Program:

- Complaint Management Procedures and Reporting
- Training and Staff Resources
  - Civil Rights & Public Accommodations — Nondiscrimination Requirements
  - Serving Non-English-Speaking Customers
  - Serving Customers with Disabilities

To ensure ongoing compliance, RTD will conduct periodic reviews and request that Transdev submit the required documents listed above, along with training completion records for all relevant trainings. Additionally, RTD reserves the right to audit Transdev's Title VI-related documents and ADA-related documents, policies, and procedures as needed.

If Transdev makes any significant changes to its compliance documents or trainings reviewed, it must promptly submit updates to RTD for review and approval.

Thank you for your cooperation. For ADA-related questions, please contact Gabe Christie. For Title VI-related inquiries, please reach out to Martin Romero.

Gabe Christie  
Manager, ADA  
gabe.christie@rtd-denver.com



Martin Romero  
Manager, Transit Equity  
martin.romero@rtd-denver.com



# **RTD 2025-2028 Title VI Program**

## **Attachment M: MTM Transit Title VI Concurrence Letter**

DRAFT

**August 28, 2024**

To: Leslie Stone, Regional Vice President, MTM

**Subject: Contractor Title VI Compliance Review**

Dear MTM,

This letter confirms receipt of MTM's Title VI and Americans with Disabilities Act (ADA) documentation related to compliance with Title VI of the Civil Rights Act of 1964, Titles II and III of the ADA, and the Federal Transit Administration (FTA) Circulars 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, and 4710.1, Americans with Disabilities Act (ADA): Guidance.

The Transit Equity Office and the American with Disabilities Act Office have reviewed the following documents and determined that they meet the requirements outlined in the FTA Circular and RTD's Title VI Program:

- Complaint Management Procedures and Reporting
- Training and Staff Resources
  - Civil Rights & Public Accommodations — Nondiscrimination Requirements
  - Serving Non-English-Speaking Customers
  - Serving Customers with Disabilities

To ensure ongoing compliance, RTD will conduct periodic reviews and request that MTM submit the required documents listed above, along with training completion records for all relevant trainings. Additionally, RTD reserves the right to audit Transdev's Title VI-related documents and ADA-related documents, policies, and procedures as needed.

If MTM makes any significant changes to its compliance documents or trainings reviewed, it must promptly submit updates to RTD for review and approval.

Thank you for your cooperation. For ADA-related questions, please contact Gabe Christie. For Title VI-related inquiries, please reach out to Martin Romero.

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# **RTD 2025-2028 Title VI Program**

## **Attachment N: January 2025 Service Equity Analysis**

DRAFT

# BOARD OF DIRECTORS REPORT

January 2025 Title VI Service Equity Analysis

Committee Meeting Date: November 14, 2024
Board Meeting Date: December 3, 2024

## RECOMMENDED ACTION

For the Board of Directors (Board) to adopt the Title VI Service Equity Analysis report for January 2025 service changes to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964.

## STAFF REPRESENTATIVE

Martin Romero, Transit Equity Manager, Civil Rights Division  
Carl Green Jr., Director of the Civil Rights Division  
Jessie Carter II, Senior Manager, Service Planning and Scheduling

## PRESENTATION LENGTH

15 minutes

## BACKGROUND

The 27 service changes proposed for January 2025 facilitate opportunities for bus and rail personnel to select new work assignments and for the Service Development Division to adjust the overall operations plan for the transit network. Additionally, with the Board’s adoption of the Reimagine RTD System Optimization Plan (SOP), several of the service change proposals reflect the first phases of SOP implementation to provide the best possible value to customers.

The Board-adopted guidance for proposed service changes continues to be:

- Service performance evaluation based on service standards
- Maintaining the overall integrity of the transit network and on transit dependent markets
- Making alternative services available to affected customers
- Cost-effective distribution throughout the District and Family of Services and the ability to enhance service when possible
- Compliance with 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
- Response to changes in the communities where services are provided

## Service Equity Analysis Requirements of Title VI of the Civil Rights Act

The Federal Transit Administration’s (FTA) Circular 4702.1B provides its recipients of 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. The January 2025 service

change proposal includes eight major service changes out of 27 total changes. Thus, an analysis is required to be brought before the Board for its consideration. The complete Title VI Service Equity Analysis report is included in Attachment A.

### **Title VI Service 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 the foundational requirements for evaluating service change proposals for equity. These policies and their applicable thresholds are listed below:

#### Major Service Change Policy:

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 12 or more months. All major service changes will be subject to an equity analysis.

#### Title VI Policies:

- **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.
- **Disproportionate Burden Policy:** A major service change should not adversely affect a low-income population 10% 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% of the Department of Health and Human Services Poverty Guidelines.

### **DISCUSSION**

Staff proposes changes to 22 bus routes, two FlexRide zones, and three rail lines commencing January 2025. Of these changes, eight services have proposed additions to service 25% greater than that of baseline service and thus meet established thresholds for a major service change. Those routes are shown in bold in the following table.

<b>Schedule Timing (Six services)</b>	42, 52, 65, 76, NB, D Line
<b>Route Adjustment (Six services)</b>	1, 15, <b>35</b> , 44, 1E/44, 45
<b>Service Increase/Seasonal Adjustments (15 services)</b>	24, <b>49</b> , 73, <b>83D</b> , <b>100</b> , <b>139</b> , 205/205T, 208, <b>AB</b> , <b>FF5</b> , <b>LD1</b> , E Line, H Line, Broomfield North FlexRide, Interlocken/Westmoor FlexRide

Methodology: Disparate impact and disproportionate burden analyses were performed at the route/line level, route/line block group, and network level to identify any potential disparities in service changes based on race/ethnicity or income.



### Summary of Findings:

- Potential disparate impacts and disproportionate burdens were identified at the individual route level: of the eight bus routes with major service changes (Routes 35, 49, 83D, 100, 139, AB1, FF5, and LD1), three routes (Routes 100, AB1, and LD1) had a potential disparate impact finding, and one route (Route 139) had a potential disproportionate burden finding.
  - Route 100 has a potential disparate impact finding due to minority populations receiving 0.42% less benefit than non-minority populations. Low-income populations receive 0.03% more benefit than non-low-income populations.
  - Route 139 has a potential disproportionate burden finding due to low-income populations receiving 0.18% less benefit than non-low-income populations. Minority populations receive 0.18% more benefit than non-minority populations.
  - Route AB1 has a potential disparate impact finding due to minority populations receiving 0.39% less benefit than non-minority populations. Low-income populations receive 1.09% more benefit than non-low-income populations.
  - Route LD1 has a potential disparate impact finding due to minority populations receiving 0.21% less benefit than non-minority populations. Low-income populations receive 0.05% more benefit than non-low-income populations.
  - While not considered a major service change, the truncation of the Route 1 impacts equity (i.e., minority and low-income) populations more than non-equity (i.e., non-minority and non-low-income) populations. Minority populations are impacted 0.53% more than non-minority populations. Additionally, low-income populations are impacted 1.01% more than non-low-income populations. Truncation of the Route 44 also has a potential disproportionate burden finding due to low-income populations being impacted 1.0% more than non-low-income populations (whereas populations are impacted 0.09% less than non-minority populations). On the other hand, the merger of segments from Routes 1 and 44 into the 1/44E Art District Connector had no potential findings and will maintain service availability to the truncated portions of the Routes 1 and 44.
- The proposed major service changes were examined in aggregate, at the network level, to determine overall impacts to equity populations compared to non-equity populations. At the network level, minority populations stand to benefit more than non-minority populations (10.61% vs. 10.32% respectively). This difference does not meet the disparate impact threshold of 9.29%. Therefore, no system-level disparate impact finding is found with the proposed major service increases. Low-income populations stand to benefit more than non-low-income populations (12.8% vs. 9.89%, respectively). The difference does not meet the 10% disproportionate burden threshold of 8.9%. Therefore, no system-level disproportionate burden is found with the proposed major service increases.

### Conclusions:

Although three major service changes resulted in a potential disparate impact and one major service change resulted in a potential disproportionate burden at the route level, staff recommends the January 2025 service plan as proposed, as there are no practical alternatives to avoid, minimize, or mitigate the potential disparate impacts and disproportionate burden. Additionally, the network-level analysis provides holistic understanding of changes to service levels for Title VI-protected populations across the service

area compared to the route level. The analysis revealed no network-level findings. In fact, both minority and low-income populations stand to benefit more at the network level from the major service changes than non-minority and non-low-income populations. All eight bus routes facing major service changes serve higher than average low-income populations, and three of the routes serve higher than average minority populations with only three improvements (specifically, to the Routes 100, AB1 and LD1) serving areas with relatively low minority populations as compared to non-minority populations. Improving service on these routes does not raise concerns of inequitable distribution of benefits given the results of the network-level analysis indicating that Title VI concerns are minimal (0.42%, 0.18%, 0.39% and 0.21%, respectively).

In adopting this report, the agency seeks to meet the 2021-2026 Strategic Plan priority of Community Value while maintaining compliance with Title VI federal regulations. RTD will continue to assess the equity implications for all subsequent service change proposals and will propose adjustments and service alternatives as appropriate in future service change recommendations.

### FINANCIAL IMPACT

The adoption of the Title VI Service Equity Analysis will not result in any direct or foreseeable financial impacts.

### ATTACHMENTS:

- Title VI Service Equity Analysis Report for Jan 2025 Service Change Proposal 24.11.05 (DOCX)
- Attachment B January 2025 Service Equity Analysis Recommended Action Item - 31 October 2024-FINAL (PPTX)

<b>RESULT:</b>	<b>PASSED BY CONSENT VOTE [UNANIMOUS]</b>
<b>MOVER:</b>	JoyAnn Ruscha, Director, District B
<b>SECONDER:</b>	Peggy Catlin, Director, District N
<b>AYES:</b>	Bouquet, Broom, Buzek, Catlin, Davidson, Guissinger, Guzman, Harwick, Lewis, Rosenthal, Ruscha, Sloan, Tisdale, Whitmore

Prepared by:

Dani McLean, Transit Equity Specialist

Martin Romero, Transit Equity Manager

Approved by:

  
Carl Green Jr., Director, Civil Rights 11/5/2024

Authorized by:



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Debra A. Johnson, General Manager and CEO

11/7/2024



# Title VI Service Equity Analysis Report

January 2025 Service Changes

# Service Equity Analysis: January 2025

## Contents

Executive Summary.....2

*Methodology* .....2

*Major Service Changes* .....2

*Findings*.....4

Introduction.....5

*Title VI and Environmental Justice*.....5

*Service Change Philosophy* .....5

*RTD’s Title VI Equity Analysis Policies* .....6

Analysis.....7

*Data Sources and Methodology* .....7

*Public Outreach Overview* .....7

*Major Service Change, Disparate Impact and Disproportionate Burden Analyses* .....8

        Changes by Transit Mode .....9

*Major Service Change Review* .....9

        Major Service Change Reductions .....9

        Major Service Change Increases .....10

        Route- and Line-Level Analysis .....10

        Systemwide Analysis .....21

Summary of Findings .....27

Appendix A: Systemwide Service Changes

Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores

# Service Equity Analysis: January 2025

## Executive Summary

This document summarizes the analysis of major service changes proposed for **January 2025** to ensure that the changes will not inequitably impact 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 proposes changes to **22 bus routes, two FlexRide zones and three rail lines** of RTD's forthcoming **January 2025** service change. Of this change, **eight** services meet established thresholds for a major service change. The service tabulated below has proposed adjustments that were greater than 25% of baseline service and are proposed for the long-term (will remain in effect for 12 or more months).

Route Modification (one service)	<b>Route 35:</b> As described in the SOP, segment reinstated east of Englewood Station to Nine Mile Station primarily along Hampden Avenue
<b>Service Increases (seven services)</b>	<b>Route 49:</b> Daily service frequency increased to 30 minutes throughout the service day; service span expanded to extend to 11 p.m. on weekdays, to commence at 5 a.m. and extend through 11 p.m. on Saturdays, and to commence at 6 a.m. and extend through 8 p.m. on Sundays
	<b>Route 83D:</b> Weekday midday and evening service increased to 30-minute frequency
	<b>Route 100:</b> Service frequency increased between Federal Center Station (W Line) and Arvada Ridge Station (G Line)
	<b>Route 139:</b> Service spans expanded to extend two hours later on weekdays and to commence one hour earlier and extend two hours later on Saturdays and Sundays
	<b>Route AB1:</b> AB2 trips reinstated from Downtown Boulder Station; daily service increased to 30-minute frequency throughout the service day
	<b>Route FF5:</b> 3:02 p.m. eastbound trip added from Downtown Boulder Station to Anschutz; 2:45 p.m. westbound FF5 trip shifted to 2:30 p.m.; eastbound 4:02 p.m. trip added to interline with current westbound trip at 5:15 p.m.
	<b>Route LD1:</b> Two morning and two afternoon/evening peak trips added from Bross St/8th Ave to Denver Union Station in each direction

### Minor Service Changes

The service tabulated below has proposed adjustments that were less than 25% of baseline service. This includes **one** route merger proposal that, while not currently included in the major service change policy, represents a significant change to the alignments of two bus routes. Other adjustments include service increases under the major service change threshold and schedule timing changes.



# Service Equity Analysis: January 2025

<p><b>Schedule Timing (Five services)</b></p>	<p><b>Route 42:</b> Running time adjustments due to changes on Route 45</p> <p><b>Route 52:</b> Schedule adjustments to improve on-time performance for all service days</p> <p><b>Route 65:</b> Schedule adjustments to improve on-time performance for all service days</p> <p><b>Route 76:</b> Schedule adjustments to improve on-time performance on weekdays</p> <p><b>NB:</b> Minor changes to weekday schedule to account for class start/end times at Boulder High and Nederland High, as well as operational hours at Eldora Ski Resort</p> <p><b>D Line:</b> Schedule adjustments due to ongoing maintenance work</p>
<p><b>Service Increase (Six services)</b></p>	<p><b>Route 24:</b> Service spans expanded to extend two hours later on weekdays, and commence one hour earlier extend and two hours later on Saturdays and Sundays</p> <p><b>Route 73:</b> Daily service span increased to provide later evening trips</p> <p><b>Route 205/205T:</b> Tripper service added to address overloads on Route BOLT due to increase in Boulder High School usage</p> <p><b>Route 208:</b> School tripper service added to address overloads on the regular scheduled 7:51 a.m. westbound trip due to increase in Boulder High School usage</p> <p><b>E Line:</b> Reinstatement of 15-minute frequency (temporary change)</p> <p><b>H Line:</b> Reinstatement of 15-minute frequency (temporary change)</p>

# Service Equity Analysis: January 2025

<p><b>Route Adjustment (Seven services)</b></p>	<p><b>Route 1:</b> Service east of 17<sup>th</sup>/18<sup>th</sup> Streets truncated and rerouted to Civic Center Station via Broadway/Lincoln. The new routing would serve the current alignment between Lakewood Commons and 17<sup>th</sup>/Stout.</p> <p><b>Route 15:</b> Routing updated to reflect a current detour, which removes access to the stop at 13<sup>th</sup> Avenue/Lisbon Street, due to inability to reliably and in the safest manner, resume westbound operations after serving the stop. Service to 13<sup>th</sup> Avenue/Lisbon Street bus stop will start as soon as the traffic signal is completed at Colfax Avenue/Picadilly Street.</p> <p><b>Route 44:</b> Service east of 17<sup>th</sup>/18<sup>th</sup> Streets truncated and rerouted service to Civic Center Station via Broadway/Lincoln. The new routing would serve the current alignment between Wheat Ridge/Ward Road Station and 17<sup>th</sup>/California Streets.</p> <p><b>Route 45:</b> Routing updated to reflect ongoing westbound detour related to left turn at unsignalized intersection from Ireland St onto 56<sup>th</sup> Ave. Buses will operate in a loop via Maxwell, right on Dunkirk, right on 56<sup>th</sup> Ave and right on Ireland. Buses will serve the same stops on Ireland St, Dunkirk and 56<sup>th</sup> Ave in both directions. Original routing will be restored when a traffic signal at the intersection is installed and operable</p> <p><b>Route 1E/44 (Art District Connector):</b> Eastern portion of the Route 1 and Route 44 combined, connecting the Baker and Five Points neighborhoods from Alameda Station to 40<sup>th</sup>/Colorado Station; the western portions of the Routes 1 (Lakewood Commons to Civic Center Station) and 44 (Wheat Ridge/Ward Station to Civic Center Station) retained into downtown Denver, with the new merged routing renamed as the ART Connector</p> <p><b>NBFX (Broomfield North FlexRide):</b> Boundaries expanded to include a new area</p> <p><b>ILFX (Interlocken/Westmoor FlexRide):</b> Service boundaries expanded to include a new affordable housing development</p>
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## Findings

Major service changes included in the **27** proposed **January 2025** service changes include route adjustments as well as service increases to **eight** bus routes. Of the eight routes with major service changes, three serve populations that are above the district average of minority populations, and all eight serve populations that are above the district average for low-income populations.

When considering the demographics within the service area (within a quarter mile) of the major service increases and as a proportion to the district overall, **low-income populations receive a higher increase in service** (i.e., were more positively impacted) compared to non-low-income populations. Low-income areas received 2.92% more of a benefit than non-low-income areas. This difference is above the 10% minimum threshold. **Minority areas received more of an increase in service** (i.e., were more positively impacted) compared to non-minority populations. Minority areas benefitted 0.29% more than non-minority areas, a difference above the 10% threshold.

Finally, **potential disparate impact findings** were identified at the route level for the changes proposed for Routes 100, AB1 and LD1 and a potential **disproportionate burden** for Route 139.

# Service Equity Analysis: January 2025

## Introduction

### Title VI and Environmental Justice

Equity is a core principle of RTD's functional mission to provide mass 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 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 current and proposed runboards. Routes with major service changes include one major increase and one reinstatement of a formerly suspended route pattern. These changes and all others have been reviewed individually at the route/line 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/lines, the elimination of existing routes/lines and changes to the alignment and trip frequency within existing routes/lines. RTD has established principles to identify the service changes needed to meet the diverse travel needs of those within the district and maintain a high-performance, sustainable transit system.

#### **RTD Service Changes Guiding Principles**

- Service performance evaluation based on 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
- Compliance with 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

# Service Equity Analysis: January 2025

- Response to changes in the communities where services are provided

RTD services are divided into various service classes (Family of Services) 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 agency'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 agency 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.

*Colorado Revised Statutes 32-9-119.7 Farebox Recovery Ratios – Plans*

## RTD's Title VI Equity Analysis Policies

Based on requirements within FTA Circular 4702.1B Chapter IV.7, RTD, as an agency receiving federal funding, 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% addition or reduction in the service hours of any route that would remain in effect for 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 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% 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 150% 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

# Service Equity Analysis: January 2025

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 and Methodology

Demographic data used for this analysis comes from the Census Bureau’s American Community Survey (ACS) 5-Year Estimates for years 2018 to 2022 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 **January 2025** service change looked at whether an individual bus route’s or rail line’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 quarter-mile service area of a bus route or rail line. These proportional differences were compared against district population proportions of equity populations and route/line proportions of equity populations.

Low-income status for population within the district is derived from Census Bureau population estimates 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 three. Minority status is based on the non-white and Hispanic or Latino count of total population. The service area is based on the collection of block groups wholly or partially within district boundaries.

Route/line service area population is determined using a quarter mile “catchment area” centered around bus stops and rail stations. This catchment area is then used to calculate the percentage overlap of block group-based population underneath. For instance, if a catchment area contains 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 calculates the net change in service hours for each route/line proposal to provide the percent difference from baseline service hours. Any change meeting or exceeding a 25% change (either positive or negative) from baseline is flagged as a major service change for further review.

### Public Outreach Overview

Three public meetings were conducted October 21-22, 2024. The comments collected on service changes during these meetings are summarized in the table below. **Table 1** captures the meeting locations, dates, number of attendees and the common themes of attendees’ comments pertaining to the major service changes described in this analysis.

# Service Equity Analysis: January 2025

Table 1. Public meeting details

Date and Time   Location	Comment Themes	Number of Attendees
October 21 at 12 p.m.   Virtual	Support service increases on AB and FF5	6
October 21 at 5:30 p.m.   1660 Blake St, Denver, CO, 80202	Support service increases to 83D, LD1 and Route 49	8
October 23 at 5:30 p.m.   Virtual	Like service increase on AB and FF5	4
		<b>Total – 18</b>

The public was also notified of the ability to submit comments to [service.change@rtd-denver.com](mailto:service.change@rtd-denver.com), by phone at 303-299-6000 and at Board of Directors' meetings. In 2024, RTD also added the option for the public to provide comment by completing route- and line-specific surveys found at [www.rtd-denver.com/service-alerts/service-changes](http://www.rtd-denver.com/service-alerts/service-changes).

There was a total of 1,289 responses on the proposed service changes, with 65% indicating a very positive impact and 20% indicating a somewhat positive impact. See below for route-specific feedback:

- **Route AB1:** Received strong support with 87% finding it very positive and 11% somewhat positive
- **Route 35:** Positive response with 72% very positive and 16% somewhat positive
- **Route 49:** Mixed feedback with 40% very positive and 30% somewhat positive, but 10% very negative
- **Route 83D:** Generally well-received with 61% very positive and 28% somewhat positive
- **Route 100:** Mixed reviews; 59% very positive, 18% somewhat positive, and a combined 18% negative
- **Route 139:** Predominantly positive at 60% somewhat positive, though 20% noted a very negative impact
- **Route FF5:** Mostly positive, with 41% very positive, 32% somewhat positive, and 12% negative
- **Route LD1:** Highly favorable with 53% very positive and 36% somewhat positive, and minimal negative feedback

Overall, the feedback reflects substantial support for the proposed changes, with a few areas where impacts are more mixed.

Additionally, the Transit Equity Office collaborated with Community-Based Organizations (CBOs) to share information on service changes and encourage customer feedback on the proposed changes to the routes. Through this partnership, three CBOs attended a total of nine events, directly reaching 944 community members.

## Major Service Change, Disparate Impact and Disproportionate Burden Analyses

Proposed service changes for the **January 2025** runboard that resulted in a 25% or greater change in service were categorized by equity population (minority or non-minority, low-income or non-low-income) for



# Service Equity Analysis: January 2025

comparison. Routes were categorized as either equity or non-equity based on their identification within the prior (current) network using 2018-2022 American Community Survey (ACS) five-year demographic data.

A comparative, proportional equity analysis was completed to review the routes/lines individually. This analysis identified the equity and non-equity populations within a route/line service area and compared those against the equity and non-equity populations of the district. If impacted equity populations within the route/line service area received 10% or greater impacts compared to non-equity populations, the route/line had a potential finding of Disparate Impact (for minority populations) or Disproportionate Burden (for low-income populations) and was flagged for a potential finding of impact.

**Major Service Change Test**

Identify routes with proposed major service changes (based on trips or hours) of 25% or more

## Changes by Transit Mode

For the **January 2025** runboard, 22 fixed-route bus routes and three rail lines will undergo various service changes. Of these, **12** routes will see combined increases in **bus service of over 407 total weekday revenue service hours and 541 additional weekend service hours.**<sup>1</sup> While not considered a major service change under current policy, the proposal to merge portions of Routes 1 and 44 represents a significant change in alignment and service patterns. Service increases on other routes include additional service frequencies and spans of service (longer hours of service) on several routes both for weekday and weekend service.

Table 2. Summary of service changes by transit mode

Mode	Change in Weekday Daily Hours	Change in Saturday Daily Hours	Change in Sunday Daily Hours
All Bus	+407	+300	+241
All Rail	0	0	0
Overall	+407	+300	+241

## 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/lines prior to individual review of routes/lines, route/line block groups and overall network levels; equity grouping comparison occurred at every level. Major service changes are categorized as the following:

- **Major Service Reductions** (a service reduction of 25% or more)
- **Major Service Increases** (service increases of 25% or more related to new or restructured service)

### Major Service Change Reductions

There are no major service reductions proposed for the proposed **January 2025** runboard.

<sup>1</sup> The reinstatement of 15-minute frequency on the E and H Lines are not noted here as an increase in service hours given that their baseline frequency prior to ongoing maintenance projects (notably, the Copping Panel project and Downtown Rail Reconstruction project in 2024) was 15 minutes. Thus, there is no change in service hours.

9

# Service Equity Analysis: January 2025

## Major Service Change Increases

Eight bus routes had proposed major service increases which include service increases of 25% or greater. Improved headways and spans of service are proposed on Routes 49, 83D, 100, 139, AB1, FF5 and LD1 for the **January 2025** service change. The proposed segment reinstatement of the Route 35 is outlined in the RTD Board approval of the System Optimization Plan (SOP).

## Other Changes

While not currently included within major service change policies, the proposal to truncate Routes 1 and 44 at Civic Center Station and combine those truncated segments into the new 1E/44 (Art District Connector) route represents a significant change in alignment and service patterns. While the truncation may impact some customers who previously rode through downtown to the respective route ends, data supporting the proposal indicates potential improvements in trips for customers who formerly had to transfer to complete the new route pattern as well as improved service to and through downtown Denver.

## Route- and Line-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/line individually to determine potential Disparate Impacts (DI) and/or Disproportionate Burdens (DB). 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/line with a major service change, determine the percent of the route's/line'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 DI or DB findings. For service increases, the following analysis examines the extent to which the benefits of the improvements are inclusive of minority and low-income populations. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, food and social services for minority and low-income populations.

### Route 35

*Proposal: Segment reinstated east of Englewood Station to Nine Mile Station primarily along Hampden Avenue, as described in the Systems Optimization Plan.*

As shown in **Table 3**, a slightly higher percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (0.98% vs. 0.79%, respectively). This difference does not meet the 10% disproportionate burden threshold (0.71%). Therefore, no potential route-level disproportionate burden is found. Additionally, a higher percentage of the district's minority population benefits from the proposed major service decrease as compared to the non-minority population (1.10% vs. 0.65%, respectively). This difference does not meet the 10% disparate impact threshold (0.58%). Thus, there is no potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

# Service Equity Analysis: January 2025

Table 3. Route 35 Disparate Impact and Disproportionate Burden Analysis

Route 35 - Hampden Avenue				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>12,370</b>	<b>12,629</b>	<b>20,517</b>	<b>4,196</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	99.35%	98.90%	99.21%	99.02%
<b>% District Impacted</b>	<b>0.65%</b>	<b>1.10%</b>	<b>0.79%</b>	<b>0.98%</b>
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>0.58%</b>	<b>1.10%</b>	<b>0.71%</b>	<b>0.98%</b>

The improvement of service on this service would increase access to:

- 16,117 jobs
  - 51.8% low-to-medium wage jobs, which is above the RTD District average (38.8%)
  - 19.8% jobs held by minorities, which is above the RTD District average (13.8%)
  - 18% jobs held by Hispanic/Latino workers, which is just below the RTD District average (18.3%)
- 105 retail/convenience stores
- 34 human and social services centers
- 9 senior housing and facilities
- 15 colleges, middle schools and elementary schools

## Route 49

*Proposal: Daily service frequency increased to 30 minutes throughout the service day; service span expanded to extend to 11 p.m. on weekdays, to commence at 5 a.m. and extend through 11 p.m. on Saturdays, and to commence at 6 a.m. and extend through 8 p.m. on Sundays*

As shown in **Table 4**, a higher percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (1.03% vs. 0.33%, respectively). This difference does not meet the 10% disproportionate burden threshold (0.30%). Therefore, no potential route-level disproportionate burden is found. Additionally, a higher percentage of the district's minority population benefits from the proposed major service increase as compared to the non-minority population (0.87% vs. 0.17%, respectively). This difference does not meet the 10% disparate impact threshold (0.16%). Thus, there is no potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

# Service Equity Analysis: January 2025

Table 4. Route 49 Disparate Impact and Disproportionate Burden Analysis

Route 49 - Denver/ Commerce City				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>3,304</b>	<b>10,020</b>	<b>8,578</b>	<b>4,434</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	99.83%	99.13%	99.67%	98.97%
<b>% District Impacted</b>	<b>0.17%</b>	<b>0.87%</b>	<b>0.33%</b>	<b>1.03%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>0.16%</b>	<b>0.87%</b>	<b>0.30%</b>	<b>1.03%</b>

The improvement of service on this service would increase access to:

- 8,856 jobs
  - 39.6% low-to-medium wage jobs, which is above the RTD District average (38.8%)
  - 14.6% jobs held by minorities, which is above the RTD District average (13.8%)
  - 32.3% jobs held by Hispanic/Latino workers, which is above the RTD District average (18.3%)
- 41 retail/convenience stores
- 8 human and social services centers
- 1 senior housing facility
- 8 colleges, middle schools and elementary schools

## Route 83D

*Proposal: Weekday midday and evening service increased to 30-minute frequency*

As shown in **Table 5**, a slightly higher percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (1.84% vs. 1.28%, respectively). This difference does not meet the 10% disproportionate burden threshold (1.15%). Therefore, no potential route-level disproportionate burden is found. However, a lower percentage of the district's minority population benefits from the proposed major service increase as compared to the non-minority population (1.29% vs. 1.38%, respectively). This difference does not meet the 10% disparate impact threshold (1.24%). Thus, there is no potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

# Service Equity Analysis: January 2025

Table 5. Route 83D Disparate Impact and Disproportionate Burden Analysis

Route 83D - Cherry Creek / Parker Rd Limited				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>26,398</b>	<b>14,871</b>	<b>33,206</b>	<b>7,930</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	98.62%	98.71%	98.72%	98.16%
<b>% District Impacted</b>	<b>1.38%</b>	<b>1.29%</b>	<b>1.28%</b>	<b>1.84%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>1.24%</b>	<b>1.29%</b>	<b>1.15%</b>	<b>1.84%</b>

The improvement of service on this service would increase access to:

- 69,649 jobs
  - 34.3% low-to-medium wage jobs, which is below the RTD District average (38.8%)
  - 15.3% jobs held by minorities, which is above the RTD District average (13.8%)
  - 17.6% jobs held by Hispanic/Latino workers, which is below the RTD District average (18.3%)
- 176 retail/convenience stores
- 85 human and social services centers
- 7 senior housing and facilities
- 22 colleges, middle schools and elementary schools

## Route 100

*Proposal: Service frequency increased between Federal Center Station (W Line) and Arvada Ridge Station (G Line)*

As shown in **Table 6**, a slightly higher percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (0.90% vs. 0.87%, respectively). This difference does not meet the 10% disproportionate burden threshold (0.79%). Therefore, no potential route-level disproportionate burden is found. However, a lower percentage of the district's minority population benefits from the proposed major service increase as compared to the non-minority population (0.60% vs. 1.03%, respectively). This difference meets the 10% disparate impact threshold (0.92%). Thus, **there is a potential disparate impact found at the route level** requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

# Service Equity Analysis: January 2025

Table 6. Route 100 Disparate Impact and Disproportionate Burden Analysis

Route 100 - Kipling Street				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>19,678</b>	<b>6,950</b>	<b>22,631</b>	<b>3,869</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	98.97%	99.40%	99.13%	99.10%
<b>% District Impacted</b>	<b>1.03%</b>	<b>0.60%</b>	<b>0.87%</b>	<b>0.90%</b>
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>0.92%</b>	<b>0.60%</b>	<b>0.79%</b>	<b>0.90%</b>

The improvement of service on this service would increase access to:

- 15,864 jobs
  - 43.0% low-to-medium wage jobs, which is above the RTD District average (38.8%)
  - 11.6% jobs held by minorities, which is below the RTD District average (13.8%)
  - 17.8% jobs held by Hispanic/Latino workers, which is below the RTD District average (18.3%)
- 78 retail/convenience stores
- 27 human and social services centers
- 7 senior housing and facilities
- 12 colleges, middle schools and elementary schools

## Route 139

*Proposal: Service spans expanded to extend two hours later on weekdays and to commence one hour earlier and extend two hours later on Saturdays and Sundays*

As shown in **Table 7**, a slightly lower percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (0.77% vs. 0.95%, respectively). This difference meets the 10% disproportionate burden threshold (0.85%). Therefore, **a potential route-level disproportionate burden is found**. However, a higher percentage of the district's minority population benefits from the proposed major service increase as compared to the non-minority population (1.02% vs. 0.84%, respectively). This difference does not meet the 10% disparate impact threshold (0.76%). Thus, there is no potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).



# Service Equity Analysis: January 2025

Table 7. Route 139 Disparate Impact and Disproportionate Burden Analysis

Route 139 - Quincy Avenue				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>16,155</b>	<b>11,767</b>	<b>24,548</b>	<b>3,318</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	99.16%	98.98%	99.05%	99.23%
<b>% District Impacted</b>	<b>0.84%</b>	<b>1.02%</b>	<b>0.95%</b>	<b>0.77%</b>
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>0.76%</b>	<b>1.02%</b>	<b>0.85%</b>	<b>0.77%</b>

The improvement of service on this service would increase access to:

- 2,953 jobs
  - 67.3% low-to-medium wage jobs, which is above the RTD District average (38.8%)
  - 18.8% jobs held by minorities, which is above the RTD District average (13.8%)
  - 19.5% jobs held by Hispanic/Latino workers, which is above the RTD District average (18.3%)
- 29 retail/convenience stores
- 7 human and social services centers
- 6 senior housing and facilities
- 7 colleges, middle schools and elementary schools

## Route AB1

*Proposal: AB2 trips reinstated from Downtown Boulder Station; daily service increased to 30-minute frequency throughout the service day*

As shown in **Table 8**, a higher percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (1.33% vs. 0.24%, respectively). This difference does not meet the 10% disproportionate burden threshold (0.22%). Therefore, no potential route-level disproportionate burden is found. However, a lower percentage of the district's minority population benefits from the proposed major service increase as compared to the non-minority population (0.24% vs. 0.62%, respectively). This difference meets the 10% disparate impact threshold (0.56%). Thus, **there is a potential disparate impact found at the route level** requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

# Service Equity Analysis: January 2025

Table 8. Route AB1 Disparate Impact and Disproportionate Burden Analysis

Route AB1 - Boulder / Denver Airport				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>11,935</b>	<b>2,715</b>	<b>6,289</b>	<b>5,739</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	99.38%	99.76%	99.76%	98.67%
<b>% District Impacted</b>	<b>0.62%</b>	<b>0.24%</b>	<b>0.24%</b>	<b>1.33%</b>
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>0.56%</b>	<b>0.24%</b>	<b>0.22%</b>	<b>1.33%</b>

The improvement of service on this service would increase access to:

- 10,571 jobs
  - 32.0% low-to-medium wage jobs, which is below the RTD District average (38.8%)
  - 10.7% jobs held by minorities, which is below the RTD District average (13.8%)
  - 11.4% jobs held by Hispanic/Latino workers, which is below the RTD District average (18.3%)
- 94 retail/convenience stores
- 14 human and social services centers
- 9 colleges, middle schools and elementary schools

## Route FF5

*Proposal: 3:02 p.m. eastbound trip added from Downtown Boulder Station to Anschutz; 2:45 p.m. westbound FF5 trip shifted to 2:30 p.m.; eastbound 4:02 p.m. trip added to interline with current westbound trip at 5:15 p.m.*

As shown in **Table 9**, a higher percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (1.29% vs. 0.32%, respectively). This difference does not fall below the 10% disproportionate burden threshold (0.29%). Therefore, no potential route-level disproportionate burden is found. A slightly lower percentage of the district's minority population benefits from the proposed major service increase as compared to the non-minority population (0.52% vs. 0.56%, respectively). However, this difference does not fall below the 10% disparate impact threshold (0.51%). Thus, there is no potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

# Service Equity Analysis: January 2025

Table 9. Route FF5 Disparate Impact and Disproportionate Burden Analysis

Route FF5 - Flatiron Flyer				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>10,812</b>	<b>5,948</b>	<b>8,245</b>	<b>5,553</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	99.44%	99.48%	99.68%	98.71%
<b>% District Impacted</b>	<b>0.56%</b>	<b>0.52%</b>	<b>0.32%</b>	<b>1.29%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>0.51%</b>	<b>0.52%</b>	<b>0.29%</b>	<b>1.29%</b>

The improvement of service on this service would increase access to:

- 21,980 jobs
  - 31.7% low-to-medium wage jobs, which is below the RTD District average (38.8%)
  - 13.8% jobs held by minorities, which is below the RTD District average (13.8%)
  - 14.4% jobs held by Hispanic/Latino workers, which is below the RTD District average (18.3%)
- 102 retail/convenience stores
- 22 human and social services centers
- 3 senior housing and facilities
- 12 colleges, middle schools and elementary schools

## Route LD1

*Proposal: Two morning and two afternoon/evening peak trips added from Bross St/8th Ave to Denver Union Station in each direction*

As shown in **Table 10**, a slightly higher percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to the non-low-income population (1.13% vs. 1.08%, respectively). This difference does not meet the 10% disproportionate burden threshold (0.98%). Therefore, no potential route-level disproportionate burden is found. A lower percentage of the district's minority population benefits from the proposed major service increase as compared to the non-minority population (0.96% vs. 1.17%, respectively). This difference meets the 10% disparate impact threshold (1.05%). Thus, **there is a potential disparate impact found at the route level** requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

# Service Equity Analysis: January 2025

Table 10. Route LD1 Disparate Impact and Disproportionate Burden Analysis

Route LD1 - Longmont / Denver				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>22,323</b>	<b>11,004</b>	<b>28,096</b>	<b>4,881</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	98.83%	99.04%	98.92%	98.87%
<b>% District Impacted</b>	<b>1.17%</b>	<b>0.96%</b>	<b>1.08%</b>	<b>1.13%</b>
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>1.05%</b>	<b>0.96%</b>	<b>0.98%</b>	<b>1.13%</b>

The improvement of service on this service would increase access to:

- 33,589 jobs
  - 32.1% low-to-medium wage jobs, which is below the RTD District average (38.8%)
  - 11.1% jobs held by minorities, which is below the RTD District average (13.8%)
  - 14.7% jobs held by Hispanic/Latino workers, which is below the RTD District average (18.3%)
- 170 retail/convenience stores
- 59 human and social services centers
- 1 senior housing and facilities
- 28 colleges, middle schools and elementary schools

## Analysis of Minor Service Change

A route level analysis for minor service changes is atypical in RTD's equity analyses but was performed to understand the potential impacts to minority and low-income populations currently served by Routes 1 and 44 and to provide supplemental information for the **January 2025** service change. Because of the truncation of these routes prior to a merger and the potential for new transfers, proposals on the extent routes are considered service decreases. The merged segments creating the 1E/44 (Art District Connector) is considered a service increase. As with major service changes analyses, the demographics of each route were reviewed for potential DI or DB findings.

### Route 1

*Proposal: As described in the SOP, service east of 17<sup>th</sup>/18<sup>th</sup> Streets truncated and rerouted to Civic Center Station via Broadway/Lincoln. The new routing would serve the current alignment between Lakewood Commons and 17<sup>th</sup>/Stout*

For the purposes of this analysis and as a conservative measure, this proposal is assumed as a service decrease due to possibility of forced transfers at Civic Center Station. As shown in **Table 11**, a slightly higher percentage of the district's low-income population stands to be impacted from the proposed major service decrease as compared to the non-low-income population (2.13% vs. 1.12%, respectively). This difference meets the 10% disproportionate burden threshold (1.23%). Therefore, a potential route-level disproportionate burden is found. Additionally, a higher percentage of the district's minority population is impacted from the proposed major service decrease as compared to the non-minority population (1.61% vs. 1.08%, respectively). This difference meets

# Service Equity Analysis: January 2025

the 10% disparate impact threshold (1.19%). Thus, there is a potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

Table 11. Route 1 Disparate Impact and Disproportionate Burden Analysis (considered as a service decrease)

Route 1 - West 1st Avenue				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>20,751</b>	<b>18,500</b>	<b>29,031</b>	<b>9,177</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	98.92%	98.39%	98.88%	97.87%
<b>% District Impacted</b>	<b>1.08%</b>	<b>1.61%</b>	<b>1.12%</b>	<b>2.13%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>1.19%</b>	<b>1.61%</b>	<b>1.23%</b>	<b>2.13%</b>

The decrease of service on this service would impact access to:

- 22,469 jobs
  - 30.7% low-to-medium wage jobs, which is below the RTD District average (38.8%)
  - 15.5% jobs held by minorities, which is below the RTD District average (13.8%)
  - 21.8% jobs held by Hispanic/Latino workers, which is above the RTD District average (18.3%)
- 44 retail/convenience stores
- 25 human and social services centers
- 12 colleges, middle schools and elementary schools

## Route 44

*Proposal: As described the SOP, service east of 17th/18th Streets truncated and rerouted to Civic Center Station via Broadway/Lincoln. The new routing would serve the current alignment between Wheat Ridge/Ward Road Station and 17th/California*

For the purposes of this analysis and as a conservative measure, this proposal is assumed as a service decrease due to possibility of forced transfers at Civic Center Station. As shown in **Table 12**, a slightly higher percentage of the district's low-income population stands to be impacted from the proposed major service decrease as compared to the non-low-income population (2.55% vs. 1.56%, respectively). This difference meets the 10% disproportionate burden threshold (1.71%). Therefore, a potential route-level disproportionate burden is found. Additionally, a lower percentage of the district's minority population stands to be impacted from the proposed major service decrease as compared to the non-minority population (1.64% vs. 1.74%, respectively). This difference meets the 10% disparate impact threshold (1.91%). Thus, there is no potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

# Service Equity Analysis: January 2025

Table 12. Route 44 Disparate Impact and Disproportionate Burden Analysis (considered as a service decrease)

Route 44 - 44th Avenue				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>33,234</b>	<b>18,850</b>	<b>40,321</b>	<b>10,989</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	98.26%	98.36%	98.44%	97.45%
<b>% District Impacted</b>	<b>1.74%</b>	<b>1.64%</b>	<b>1.56%</b>	<b>2.55%</b>
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>1.91%</b>	<b>1.64%</b>	<b>1.71%</b>	<b>2.55%</b>

The decrease of service on this service would impact access to:

- 55,954 jobs
  - 21.6% low-to-medium wage jobs, which is below the RTD District average (38.8%)
  - 12.6% jobs held by minorities, which is below the RTD District average (13.8%)
  - 14.7% jobs held by Hispanic/Latino workers, which is below the RTD District average (18.3%)
- 88 retail/convenience stores
- 41 human and social services centers
- 15 colleges, middle schools and elementary schools

## New 1E/44 Art District Connector Route

*Proposal: Eastern portion of the Route 1 and Route 44 combined, connecting the Baker and Five Points neighborhoods from Alameda Station to 40<sup>th</sup>/Colorado Station; the western portions of the Routes 1 (Lakewood Commons to Civic Center Station) and 44 (Wheatridge-Ward Station to Civic Center Station) retained into downtown Denver, with the new merged routing renamed as the ART Connector, as described in the RTD Board-approved Systems Optimization Plan. Under current policy, this change is not considered a Major Service Change.*

As shown in **Table 13**, a higher percentage of the district's low-income population stands to benefit from the proposed merger as compared to the non-low-income population (2.02% vs. 0.90%, respectively). This difference does not meet the 10% disproportionate burden threshold (0.81%). Therefore, no potential route-level disproportionate burden is found. Additionally, a higher percentage of the district's minority population benefits from the proposed merger as compared to the non-minority population (1.31% vs. 0.92%, respectively). This difference does not meet the 10% disparate impact threshold (0.83%). Thus, there is no potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis), and the creation of the 1E/44 helps maintain service availability following the truncation of the Routes 1 and 44.



# Service Equity Analysis: January 2025

Table 13. New ART Connector Route 1-44 Disparate Impact and Disproportionate Burden Analysis

New ART Connector Route 1-44 Alameda Stn to 40th & Colorado Stn via Downtown				
September 2024 to January 2025 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>17,620</b>	<b>14,998</b>	<b>23,225</b>	<b>8,683</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	99.08%	98.69%	99.10%	97.98%
<b>% District Impacted</b>	<b>0.92%</b>	<b>1.31%</b>	<b>0.90%</b>	<b>2.02%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
<i>DI &amp; DB Thresholds are 90% for service increases and 110% for service decreases of % District Impacted Population</i>	<i>DI Threshold</i>	<i>Min Pop Impacted</i>	<i>DB Threshold</i>	<i>L-I Pop Impacted</i>
	<b>0.83%</b>	<b>1.31%</b>	<b>0.81%</b>	<b>2.02%</b>

The merging of these routes would maintain (and increase) access to:

- 90,675 jobs
  - 23.5% low-to-medium wage jobs, which is below the RTD District average (38.8%)
  - 13.5% jobs held by minorities, which is below the RTD District average (13.8%)
  - 16.9% jobs held by Hispanic/Latino workers, which is below the RTD District average (18.3%)
- 148 retail/convenience stores
- 67 human and social services centers
- 27 colleges, middle schools and elementary schools

## Systemwide Analysis

In accordance with RTD's 2022 Title VI Program Update, a systemwide analysis is required in addition to route- and line-level analyses. A system level analysis provides further understanding of changes to service levels for Title VI protected populations at aggregate levels.

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 are 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, bus service increases by over 407 weekday revenue hours and 541 weekend hours
- Of the nearly 320,000 people served by stops within the service area with major service changes, equity populations represented a higher share of population compared to district averages. Of this total, over 55,000 people with low incomes and nearly 122,000 people in minority communities would receive service improvements.

# Service Equity Analysis: January 2025

- At the systemwide level, equity routes and non-equity routes<sup>2</sup> were compared only for those with major service changes. All bus routes serve higher than average low-income populations. Of the eight bus routes with major service changes, three serve higher than average minority populations.

**In review of the proposed major service changes at the systemwide level, there are no potential disparate impact or disproportionate burden findings.**

An analysis was conducted of all district block groups and their service levels to establish the baseline equity thresholds for low-income and minority populations and to determine the systemwide magnitude of impacts of the **September 2024 to January 2025** service changes. 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 non-low-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 (14.2%) and minority population (37.5%).

Determine which block groups experienced service changes of 25% or more.

Of block groups with a major service change, compare the difference in population for equity versus non-equity block groups; if the difference is more than 10%, review for potential adverse impacts.

There are 2,197 block groups defined as being wholly within or mostly within the District.<sup>3</sup> Using the 2018-2022 Five-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 37.5% was derived by using the base population of the service area (3.064 million), the low-income population percentage of 14.2% is derived from a slightly smaller population figure (3.02 million). This is due to the smaller population whose poverty status the Census Bureau can determine.<sup>4</sup> The thresholds summarized in **Table 14** yielded 824 (37.5% of all) block groups above the district average for low-income population, and 846 (38.5%) block groups above the district average for minority population.

Table 14. District averages; NTD 2023; ACS 2018-2022 Five-year estimates

Service Area (sq. mi.)	Total Block Groups	Total Population	Percent Minority	Total Population (assessed)	Percent Low-Income
2,342	2,197	3,064,553	37.5%	3,020,954	14.2%

The proposed major service changes were examined in aggregate by transit mode to determine overall impacts to underlying population. **Table 15** summarizes the change in service for total block group populations

<sup>2</sup> Based on existence of the route within the May 2024 network and the population within a quarter mile of bus stops or rail stations. 2018-2022 Five-Year ACS estimates were used for population identification.

<sup>3</sup> Some block groups are not completely contained within district boundaries due to differences in boundaries between the District and Census-defined geographies.

<sup>4</sup> The total population whose poverty status is determinable/assessed is lower than the estimate of total population due to the inability of the Census to determine income for everyone estimated to reside in a particular block group.

22

# Service Equity Analysis: January 2025

underlying the bus stops with proposed major service increases (excluding the route merger) proportionally compared to population in the District. There are no proposed major service decreases. The 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.

No major service changes (longer than 12 months) were proposed for rail services with the **January 2025** service change; changes to D, E and H Lines are temporary changes.

Table 15. Systemwide disparate impact and disproportionate burden equity analysis summary for all major service increases (excludes Routes 1, 44)

Systemwide Disparate Impact and Disproportionate Impact Analysis: All Increases				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Impacted Block Group Population</b>	<b>197,709</b>	<b>121,939</b>	<b>256,146</b>	<b>55,102</b>
<b>District Population</b>	1,915,350	1,149,204	2,590,598	430,356
District Total	3,064,553		3,020,954	
% District Population Not Impacted	89.68%	89.39%	90.11%	87.20%
% District Population Impacted	<b>10.32%</b>	<b>10.61%</b>	<b>9.89%</b>	<b>12.80%</b>
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB thresholds are 90% for service increases & 110% for service decreases	DI Threshold	Minority Pop Impacted	DB Threshold	Low Inc. Pop Impacted
	<b>9.29%</b>	<b>10.61%</b>	<b>8.90%</b>	<b>12.80%</b>

For system-level service increases (excluding population affected by the merger of Routes 1 and 44), **minority populations stand to benefit more than non-minority populations** (10.61% vs. 10.32% respectively). This difference does not meet the disparate impact threshold of 9.29%. Therefore, no system-level disparate impact finding is found with the proposed major service increases. **Low-income populations stand to benefit more than non-low-income populations** (12.8% vs. 9.89%, respectively). The difference does not meet the 10% disproportionate burden threshold of 8.9%. Therefore, no system-level disproportionate burden is found with the proposed major service increase.

**Figures 1 and 2** illustrate the locations of above average low-income and minority block groups within the District as well as highlight services with major service changes (orange). Compared to the District overall, Routes 35, 49, 139 serve minority populations higher than the District average.

# Service Equity Analysis: January 2025

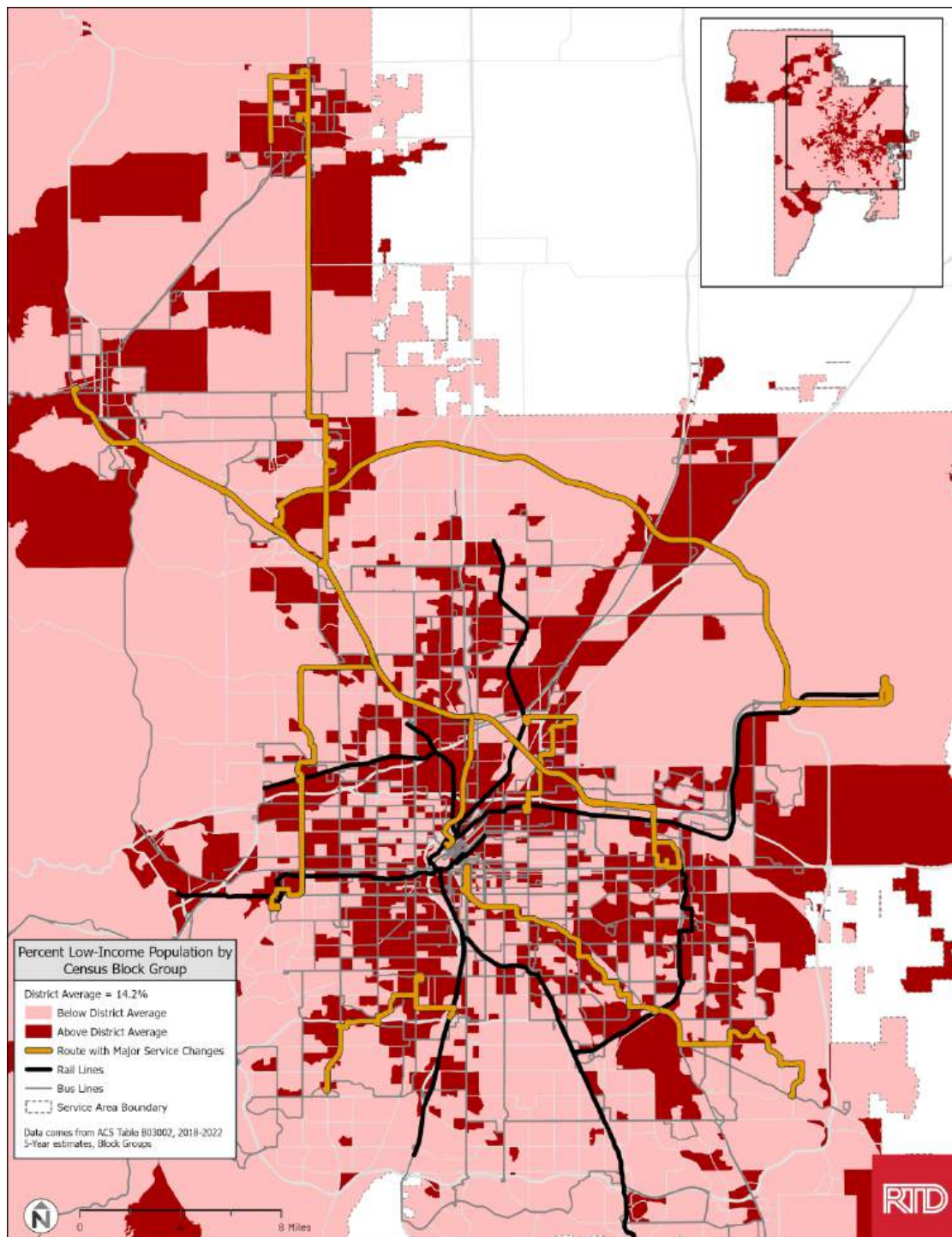


Figure 1. Block groups with above-average low-income population and routes with major service changes;  
US Census Bureau 2018-2022 5-Year Estimates



# Service Equity Analysis: January 2025

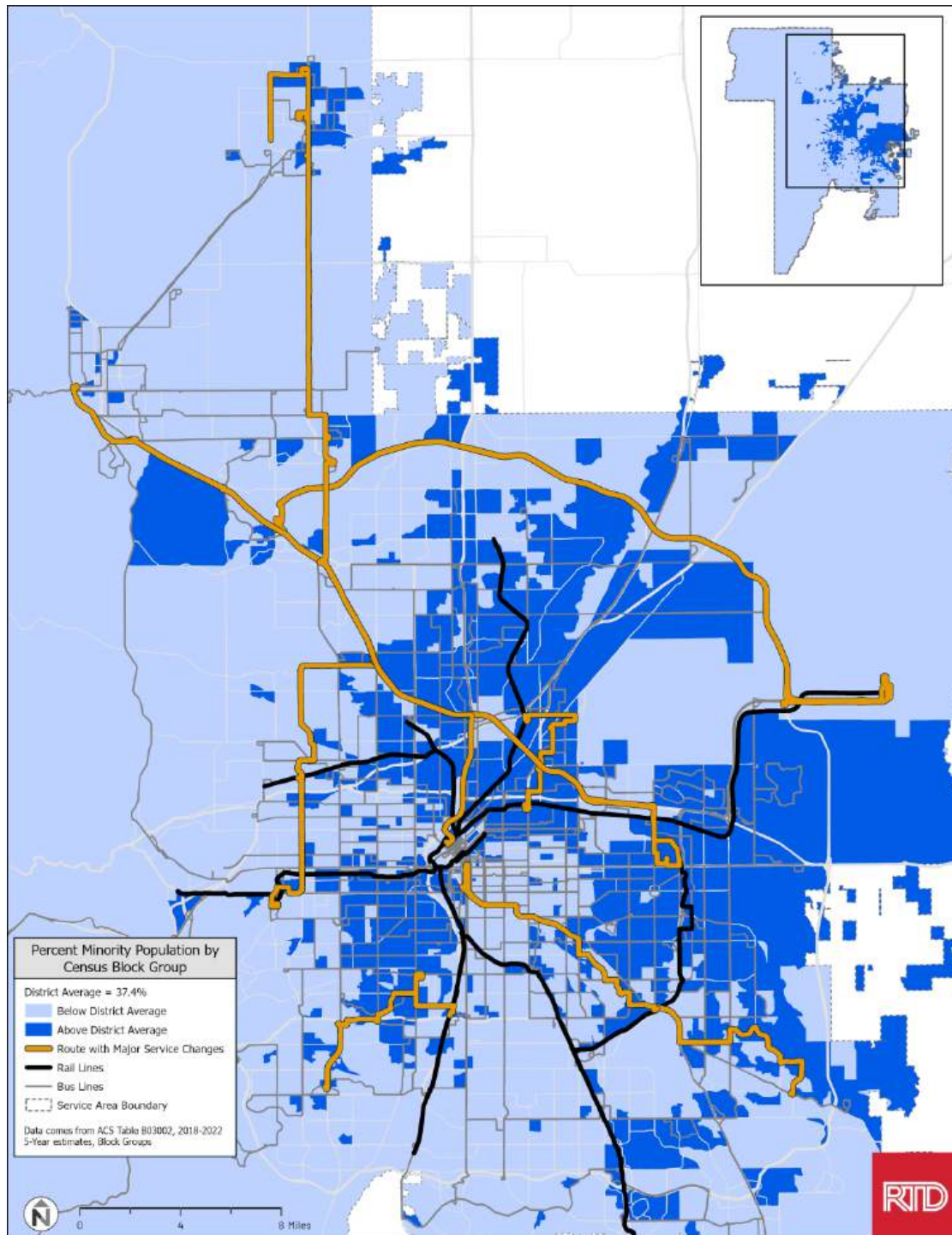


Figure 2. District block groups with above-average minority population and routes with major service changes;  
US Census Bureau 2018-2022 5-Year Estimates

Major service changes from **September 2024** to **January 2025** are captured in **Figure 3**. This map provides a generalized view of where service is changing at the route pattern level. The current bus network is shown with the change in weekday service levels colored according to the percentage change in weekday service hours. All other bus routes, shown in gray, are proposed to undergo minimal (e.g., schedule adjustments, minor realignments) or no service changes in **January 2025**.

# Service Equity Analysis: January 2025

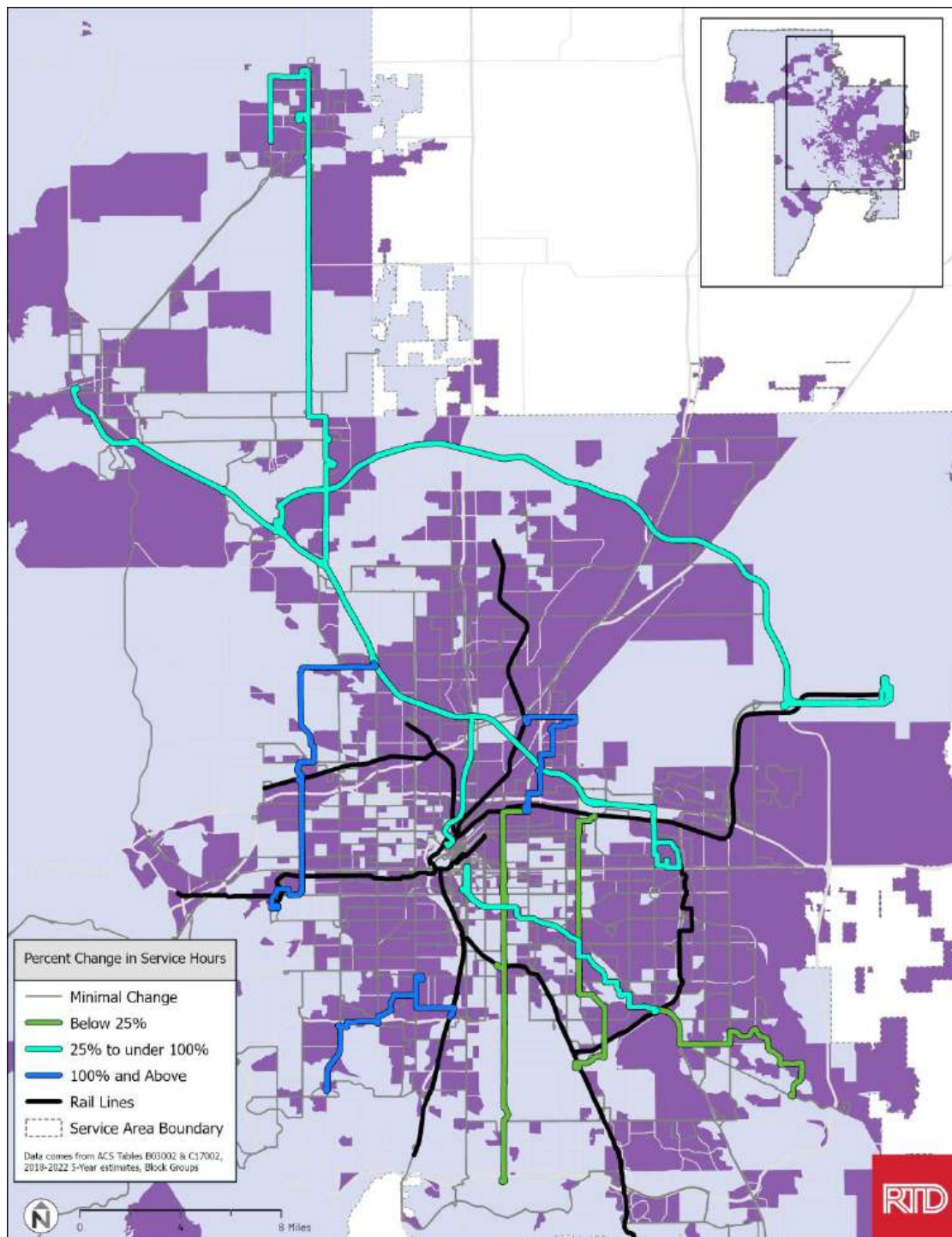


Figure 3. Depiction of route changes by percent change in weekday service hours



# Service Equity Analysis: January 2025

## Summary of Findings

The systemwide service modifications proposed between **September 2024** and **January 2025** include schedule improvements, expansions of service spans, alignment changes, and additional trips on regional routes. Eight major service changes include those for Routes 35, 49, 83D, 100, 139, AB1, FF5, and LD1.

### Route-level Findings:

- Of the 27 total services with proposed changes, taken individually, **4 had potential DI or DB findings.**
- **Route 100 has a potential disparate impact** finding due to minority populations receiving 0.42% less benefit than non-minority populations. Low-income populations receive 0.03% more benefit than non-low-income populations.
- **Route 139 has a potential disproportionate burden** finding due to low-income populations receiving 0.18% less benefit than non-low-income populations. Minority populations receive 0.18% more benefit than non-minority populations.
- **Route AB1 has a potential disparate impact** finding due to minority populations receiving 0.39% less benefit than non-minority populations. Low-income populations receive 1.09% more benefit than non-low-income populations.
- **Route LD1 has a potential disparate impact** finding due to minority populations receiving 0.21% less benefit than non-minority populations. Low-income populations receive 0.05% more benefit than non-low-income populations.
- Additionally, while not considered major service changes, the truncation of the Route 1 impacts equity (i.e., minority and low-income) populations more than non-equity (i.e., non-minority and non-low-income) populations. Minority populations are impacted 0.53% more than non-minority populations. Additionally, low-income populations are impacted 1.01% more than non-low-income populations. Truncation of the Route 44 also has a potential disproportionate burden finding due to low-income populations being impacted 1.0% more than non-low-income populations (whereas populations are impacted 0.09% less than non-minority populations). On the other hand, the merger of segments from Routes 1 and 44 into the 1E/44 Art District Connector had no potential findings and will maintain service availability to the truncated portions of the Routes 1 and 44.

**Table 16** summarizes major service changes by change type, provides findings of potential disparate impacts and disproportionate burdens based on a comparative difference analysis, and it provides the individual route service change.

# Service Equity Analysis: January 2025

Table 16. Summary of major service changes by change type and impact

Service Change Type	Route	Potential Disparate Impact?	Potential Disproportionate Burden?	Service Change Percent		
				Weekend	Saturday	Sunday
Increase	Route 35	No	No	156%	156%	278%
	Route 49	No	No	121%	0%	0%
	Route 83D	No	No	30%	0%	0%
	Route 100	Yes	No	139%	8%	0%
	Route 139	No	Yes	14%	23%	26%
	Route AB1	Yes	No	31%	31%	30%
	Route FF5	No	No	39%	0%	0%
	Route LD1	Yes	No	61%	0%	0%

## Systemwide-level Findings:

- Routes 35, 49, 83D, 100, 139, AB1, FF5, and LD1 comprise the January 2025 runboard's major service changes.
- Almost 320,000 people live within a quarter mile of bus stops on routes with major service increases. Both minority and low-income populations are represented at higher shares of the population than district averages (38.2% and 17.7%, respectively). **Low-income populations received a slightly higher benefit (were more positively impacted) compared to non-low-income populations.** Low-income areas benefited 2.92% more compared to non-low-income areas. **Minority populations received a higher benefit (were more positively impacted) compared to non-minority populations.** Minority areas benefited 0.29% more compared to non-minority areas.

## 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:

- Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts/disproportionate burdens, or
- 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.

Title VI concerns are minimal with the proposed January 2025 service change proposal. Although three major service changes resulted in a potential disparate impact and one major service change resulted in a disproportionate burden at the route level, RTD recommends keeping the January 2025 service plan as proposed as there are no practical alternatives to avoid, minimize or mitigate the disparate impacts and disproportionate burden. As noted in the route-level findings, improving service on these routes (100, 139, AB1 and LD1) does not raise concerns of inequitable distribution of benefits given the minimal differences (0.42%, 0.18%, 0.39% and 0.21%, respectively) between the comparator groups.

Additionally, the network-level analysis provides holistic understanding of changes to service levels for Title VI-protected populations across the service area compared to the route level. The analysis revealed no network level findings. In fact, **both minority and low-income populations stand to benefit more at the network**

# Service Equity Analysis: January 2025

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**level from the major service changes than non-minority and non-low-income populations.** All eight bus routes facing major service changes serve higher than average low-income populations, and three of the routes serve higher than average minority populations with only three improvements (specifically, to the Routes 100, AB1 and LD1) serving areas with relatively low minority populations as compared to non-minority populations.

# Service Equity Analysis: January 2025

## Appendix A: Systemwide Service Changes

Change Type	Service Changes	
	Route	Description
<b>Seasonal Adjustment (Service Increase)</b>	<b>205/205T</b>	Tripper service added to address overloads on Route BOLT due to increase in Boulder High School usage.
	<b>208</b>	School tripper service added to address overloads on the regular scheduled 7:51 a.m. westbound trip due to increase in Boulder High School usage
<b>Schedule Timing</b>	<b>42</b>	Schedule adjustments due to changes on Route 45 since the routes are interlined (trips integrated)
	<b>52</b>	Schedule adjustments to improve on-time performance for all service days
	<b>65</b>	Schedule adjustments to improve on-time performance for all service days
	<b>76</b>	Schedule adjustments to improve on-time performance on weekdays
	<b>D</b>	Schedule adjustments aimed at improving on-time performance on all service days
<b>Route Adjustment</b>	<b>1</b>	As described in the SOP, service east of 17 <sup>th</sup> /18 <sup>th</sup> Streets truncated and rerouted to Civic Center Station via Broadway/Lincoln. The new routing would serve the current alignment between Lakewood Commons and 17 <sup>th</sup> /Stout
	<b>15</b>	Routing updated to reflect a current detour, which removes access to the stop at 13th Avenue/Lisbon Street, due to inability to reliably and in the safest manner, resume westbound operations after serving the stop. Service to 13 <sup>th</sup> Avenue-Lisbon Street bus stop will start as soon as the traffic signal is completed at Colfax Avenue/Picadilly Street
	<b>35*</b>	As described in the SOP, segment reinstated east of Englewood Station to Nine Mile Station primarily along Hampden Avenue
	<b>44</b>	As described the SOP, service east of 17 <sup>th</sup> /18 <sup>th</sup> Streets truncated and rerouted to Civic Center Station via Broadway/Lincoln. The new routing would serve the current alignment between Wheat Ridge/Ward Road Station and 17 <sup>th</sup> /California
	<b>ART Connector (1E/44)</b>	Described in the SOP as the 1E/44, the eastern segments of the Route 1 and Route 44 would be combined into a new route service, connecting the Baker and Five Points neighborhoods from Alameda Station to 40 <sup>th</sup> /Colorado Station and thereby connecting the Santa Fe Arts District, the Denver Theatre District and the RiNo Arts District, inspiring the ART route name. The western portions of the Routes 1 (Lakewood Commons to Civic Center Station) and 44 (Wheat Ridge/Ward Station to Civic Center Station) would be retained at current service levels
	<b>45</b>	Routing update to reflect ongoing westbound detour related to left turn at unsignalized intersection from Ireland Street onto 56th Avenue. Buses will operate in a loop via Maxwell Place, right on Dunkirk Street, right on 56th Avenue and right on Ireland Street. Buses will serve the same stops on Ireland Street, Dunkirk Street and 56th Avenue in both directions. The original routing will be restored when a traffic signal is installed at the intersection

# Service Equity Analysis: January 2025

Change Type	Service Changes	
	Route	Description
<b>Service Increase</b>	<b>24</b>	Consistent with the SOP, service spans expanded to extend six hours later weekdays, commence one hour earlier Saturdays, and extend three hours later Saturdays and Sundays
	<b>49*</b>	Daily service frequency increased to 30 minutes throughout the service day; expand service span weekdays to 11 p.m. and to 5 a.m. – 11 p.m. Saturdays, and 6 a.m. – 8 p.m. Sundays
	<b>73</b>	Consistent with the SOP, service spans expanded to commence 90 minutes earlier and extend two hours later weekdays and commence 90 minutes earlier and extend one hour later Saturdays and Sundays
	<b>83D*</b>	Weekday midday and evening service frequency increased to 30 minutes
	<b>100*</b>	Service frequency increased between Federal Center Station (W Line) and Arvada Ridge Station (G Line), with routing primarily along Kipling Boulevard
	<b>139*</b>	Consistent with the SOP, service spans expanded to commence two hours earlier and extend four hours later weekdays and to commence one hour earlier and extend three hours later Saturdays and Sundays
	<b>AB*</b>	Consistent with the SOP, AB service levels reinstated at 30-minute peak period frequency and 60-minute mid-day frequency on weekdays, Saturdays and Sundays; modified Route AB2 pattern also reinstated between Downtown Boulder Station and Denver International Airport during morning and afternoon/evening peaks, weekdays, and Saturdays. Routing would be via Canyon Boulevard, 28th Street, US 36•Table Mesa Station, to regular routing along US 36 and C-470 to Denver International Airport. This modified pattern would replace the former AB2 while Boulder Junction @ Depot Square Station remains closed.
	<b>FF5*</b>	Consistent with the SOP, trips added eastbound trips from Downtown Boulder Station to Anschutz Medical Center would be added at 3:02 p.m. and 4:02pm. which would interline with current westbound trip at 5:15 p.m. on weekdays; also schedule adjustments shifting 2:30 and 2:45 p.m. Route FF5 trips.
	<b>LD1*</b>	Two morning and two afternoon/evening peak trips added from Bross St/8th Ave to Denver Union Station in each direction
	<b>E</b>	15-minute service frequency reinstated between RidgeGate Station and Denver Union Station
	<b>H</b>	15-minute frequency reinstated between Florida Station and the Downtown Denver Loop
	<b>NBFX</b>	Boundary expansion of the North Broomfield FlexRide to include a new area situated between the streets of Midway Boulevard to the south, Zuni Street to the east, and Main Street to the west. This expansion will also include the Walmart located at 200 West 136th Ave, as well as a small section near Outlook Bluff
	<b>ILFX</b>	Boundary expansion of the Interlocken FlexRide to include a new affordable housing development located to the northwest of the intersection of US 36 and Northwest Parkway.

*\*Major service change*



## **Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing and Facilities, Schools, Retail and Convenience Stores**



# Service Equity Analysis: January 2025

## Route 35

Extension of alignment from Englewood Station to Nine Mile Station via Hampden Avenue

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Existing Service	<div>Existing access to an estimated 13,454 jobs</div> <div><div>Low/Medium Wage Jobs*</div><div>Jobs Held by Workers of Color*</div><div>Jobs Held by Hispanic/Latino Workers*</div></div> <div><div>Route 35</div><div>District</div></div>	98	8	5	8	6	3	2	58	8
Improved Access	<div>Improvement in access to an estimated 16,117 jobs</div> <div><div>Low/Medium Wage Jobs</div><div>Jobs Held by Workers of Color</div><div>Jobs Held by Hispanic/Latino Workers</div></div> <div><div>Route 35</div><div>District Average</div></div>	163	34	9	5	2	0	8	94	11

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

Route 49  
Increase in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	<div><div>Improvement in access to an estimated 8,856 jobs</div><div><div><div>Low/Medium Wage Jobs</div><div><div>40%</div><div>39%</div></div></div><div><div>Jobs Held by Workers of Color</div><div><div>15%</div><div>14%</div></div></div><div><div>Jobs Held by Hispanic/Latino Workers</div><div><div>32%</div><div>18%</div></div></div><div><div>Route 49</div><div>District Average</div></div></div></div>	58	8	1	4	1	2	1	32	9

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

Route 83D  
Increase in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	<div><div>Improvement in access to an estimated 69,649 jobs</div><div><div><div>Low/Medium Wage Jobs</div><div>34%39%</div></div><div><div>Jobs Held by Workers of Color</div><div>15%14%</div></div><div><div>Jobs Held by Hispanic/Latino Workers</div><div>18%18%</div></div><div><div>Route 83D</div><div>District Average</div></div></div></div>	290	85	7	5	3	4	10	158	18

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

Route 100  
Increase in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	Improvement in access to an estimated 15,864 jobs	124	27	7	5	3	1	3	69	9
	Low/Medium Wage Jobs									
	Jobs Held by Workers of Color									
	Jobs Held by Hispanic/Latino Workers									

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

Route 139  
Increase in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	<div><div>Improvement in access to an estimated 2,953 jobs</div><div><div><div>Low/Medium Wage Jobs</div><div><div>Route 13967%</div><div>District Average39%</div></div></div><div><div>Jobs Held by Workers of Color</div><div><div>Route 13919%</div><div>District Average14%</div></div></div><div><div>Jobs Held by Hispanic/Latino Workers</div><div><div>Route 13919%</div><div>District Average18%</div></div></div><div><div>Route 139</div><div>District Average</div></div></div></div>	49	7	6	3	2	1	1	23	6

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

Route AB1  
Increase in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	<div><div>Improvement in access to an estimated 10,571 jobs</div><div><div><div>Low/Medium Wage Jobs</div><div>32%39%</div></div><div><div>Jobs Held by Workers of Color</div><div>11%14%</div></div><div><div>Jobs Held by Hispanic/Latino Workers</div><div>11%18%</div></div><div><div>Route AB1</div><div>District Average</div></div></div></div>	117	14	0	2	2	2	3	88	6

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.



# Service Equity Analysis: January 2025

Route FF5  
Increase in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	<div><div>Improvement in access to an estimated 21,980 jobs</div><div><div><div>Low/Medium Wage Jobs</div><div>32%39%</div></div><div><div>Jobs Held by Workers of Color</div><div>14%14%</div></div><div><div>Jobs Held by Hispanic/Latino Workers</div><div>14%18%</div></div></div><div><div>Route FF5</div><div>District Average</div></div></div>	139	22	3	3	2	2	5	94	8

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

Route LD1  
Increase in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	Improvement in access to an estimated 33,589 jobs	258	59	1	11	6	6	5	153	17
	Low/Medium Wage Jobs									
	Jobs Held by Workers of Color									
	Jobs Held by Hispanic/Latino Workers									

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

## Route 1

Reduction in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Existing Access	<div>Existing access to an estimated 109,428 jobs</div> <div><div>Low/Medium Wage Jobs</div><div>Jobs Held by Workers of Color</div><div>Jobs Held by Hispanic/Latino Workers</div></div> <div><div>Route 1</div><div>District Average</div></div>	319	66	5	8	5	5	11	194	25
Reduced Access	<div>Reduction in access to an estimated 22,469 jobs</div> <div><div>Low/Medium Wage Jobs</div><div>Jobs Held by Workers of Color</div><div>Jobs Held by Hispanic/Latino Workers</div></div> <div><div>Route 1</div><div>District Average</div></div>	81	25	0	3	4	4	1	36	8

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

## Route 44

Reduction in service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Existing Access	<div>Existing access to an estimated 112,640 jobs</div> <div><div><div>Low/Medium Wage Jobs</div><div>22%39%</div></div><div><div>Jobs Held by Workers of Color</div><div>12%14%</div></div><div><div>Jobs Held by Hispanic/Latino Workers</div><div>14%18%</div></div><div><div>Route 44</div><div>District Average</div></div></div>	327	70	6	13	8	8	14	188	20
Reduced Access	<div>Reduction in access to an estimated 55,954 jobs</div> <div><div><div>Low/Medium Wage Jobs</div><div>22%39%</div></div><div><div>Jobs Held by Workers of Color</div><div>13%14%</div></div><div><div>Jobs Held by Hispanic/Latino Workers</div><div>15%18%</div></div><div><div>Route 44</div><div>District Average</div></div></div>	144	41	0	5	1	2	7	80	8

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

# Service Equity Analysis: January 2025

Route 1E/44 (Art District Connector, merger of Routes 1 and 44 segments)  
Improved service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	Improvement in access to an estimated 90,675 jobs	242	67	0	8	5	6	8	128	20
	Low/Medium Wage Jobs									
	Jobs Held by Workers of Color									
	Jobs Held by Hispanic/Latino Workers									

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2021.

November 11, 2024



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January 2025 Proposed Service Changes

# Title VI Service Equity Analysis

**Martin Romero**

Transit Equity Manager



# Outline

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- § Proposed Service Changes Summary
- § Federal Transit Administration (FTA) Requirements
- § Equity Analysis Decision Tree
- § Title VI Policies and Methodology
- § Results
- § Public Outreach
- § Conclusion and Recommendation



# Proposed Service Changes Summary



## Increases (15 SERVICES)

24, 49, 73, 83D, 100, 139, 205/205T, 208, AB, FF5, LD1, E Line, H Line, Broomfield North FlexRide, Interlocken/Westmoor FlexRide



## Modified (SIX SERVICES)

1, 15, 35, 44, 1E/44, 45



## Schedule Timing (SIX SERVICES)

42, 52, 65, 76, NB, D Line





# FTA Requirements for Service Changes

Proposed January 2025 Service Changes

# Title VI of the Civil Rights Act of 1964

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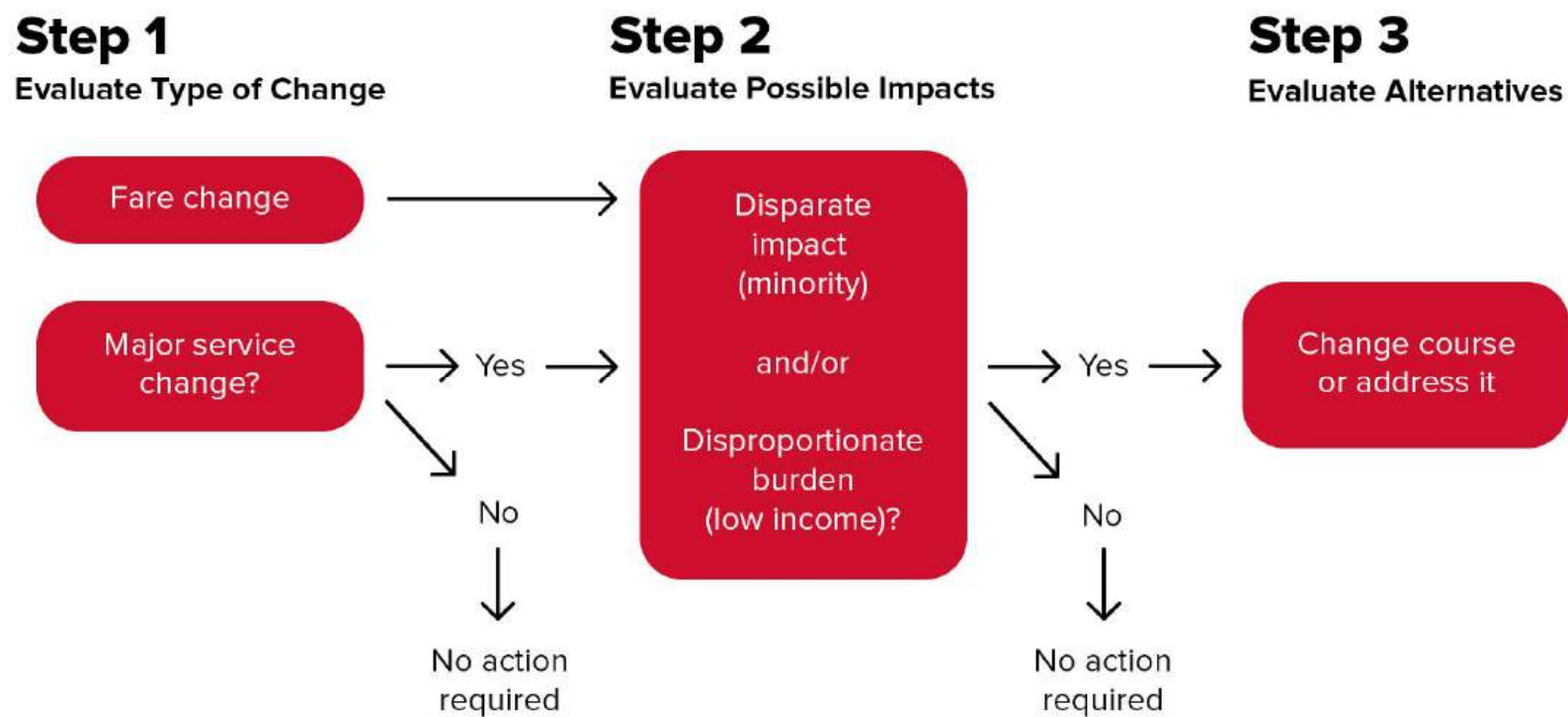


"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

FTA Circular 4702.1B

*Title VI Requirements and Guidelines* and RTD Title VI Program

# Equity Analysis Decision Tree





# Title VI Policies

Major Service Change, Disparate Impact,  
and Disproportionate Burden Policies



# Major Service Change Policy

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## Definition:

§ 25% + or – in the service hours of any bus route/rail line that would remain in effect for 12+ months

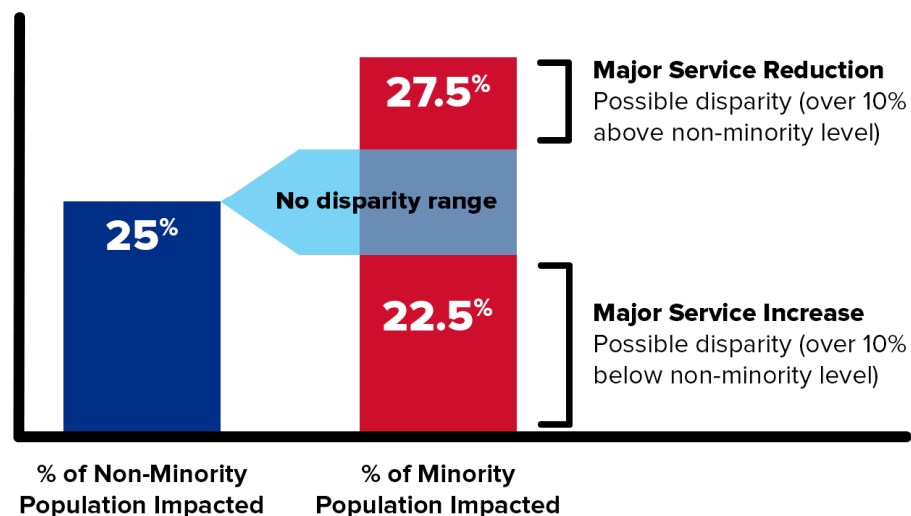
## Major Service Change Results:

§ In total, eight of the 27 proposed changes met the major service threshold

# Disparate Impact/Disproportionate Burden Policies

## Testing for Disparate Impact at the System Level



Title VI Policies  
=  
Thresholds to  
Evaluate Possible Impacts

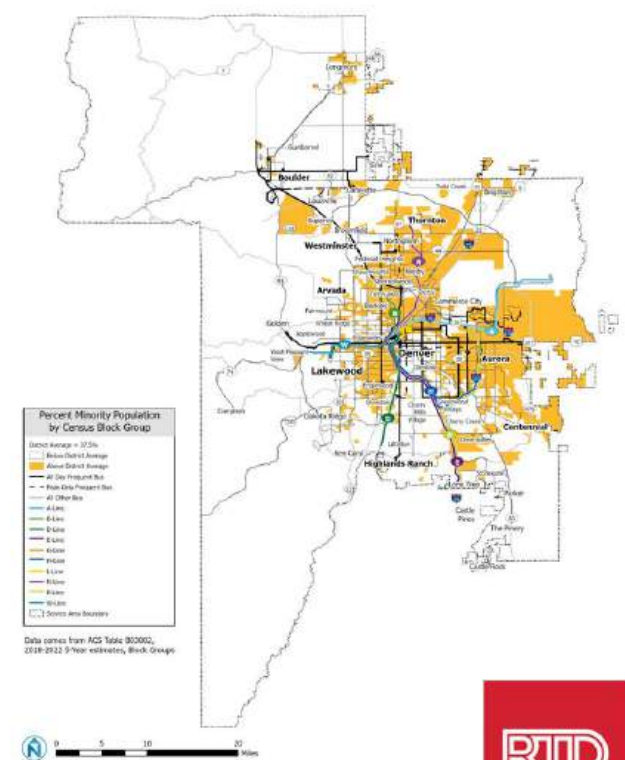
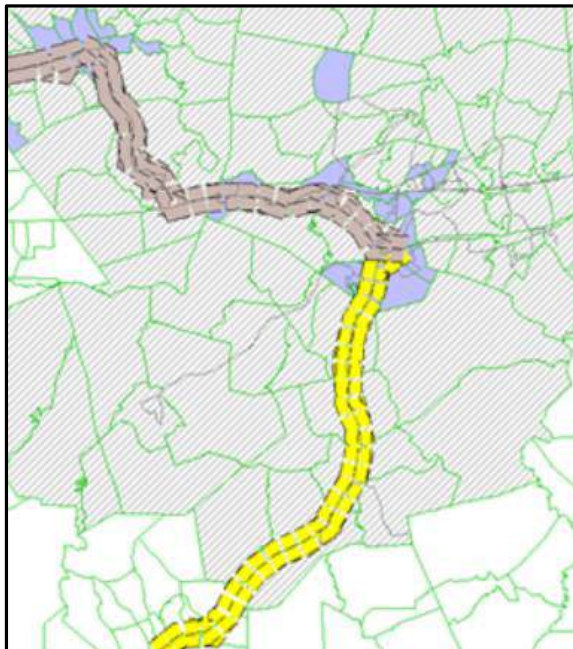


Threshold Calculation: 10% of 25% (non-minority) = 2.5%

# Methodology

1. Route-level analysis applied
2. System-level analysis applied

  **Legend**  
1/4-mile route buffer around a route



## Route Level Results

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Change Type	Route	Disparate Impact	Disproportionate Burden
Increase	Route 35	No	No
	Route 49	No	No
	Route 83D	No	No
	Route 100	Yes	No
	Route 139	No	Yes
	Route AB1	Yes	No
	Route FF5	No	No
	Route LD1	Yes	No

## Route Level Results - Route 35 (Increase)

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§ Minority populations receive more of an increase in service (i.e., are more positively impacted) compared to non-minority populations

- 0.45% more benefit for minority groups (1.10% vs. 0.65%)
- Difference does not meet the Disparate Impact threshold (0.58%)

§ Low-income populations stand to benefit slightly more than non-low-income populations

- 0.19% more for low-income groups (0.98% vs. 0.79%)
- Difference does not meet the Disproportionate Burden threshold (0.71%)



# Key Activity Centers Assessment

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**Retail and  
Convenience  
Stores**



**Schools  
PreK -  
College**



**Social  
Services**



**Senior  
Housing**



**Jobs**



# Improved Access to Key Activity Centers

	35	49	83D	100	139	AB1	FF5	LD1
Jobs	16,117	8,856	69,649	15,864	2,953	10,571	21,980	33,589
Grocers	105	41	176	78	29	94	102	170
Social Service Centers	34	8	85	27	7	14	22	59
Senior Housing	9	1	7	7	6	0	3	1
Academic Institutions	15	8	22	12	7	9	12	28



# Systemwide Level Results

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§ Minority populations stand to benefit more compared to non-minority populations

- 0.29% more for minority groups (10.61% vs. 10.32%)
- Difference does not meet Disparate Impact threshold (9.29%)

§ Low-income populations stand to benefit more compared to non-low-income populations

- 2.91% more for low-income groups (12.80% vs. 9.89%)
- Difference does not meet Disproportionate Burden threshold (8.90%)

# Public Hearings and Engagement Meetings

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- § Oct. 10 at 2:30 p.m. – Citizens Advisory Committee presentation
- § Oct. 21 at noon – Virtual
- § Oct. 21 at 5:30 p.m. – In-person
- § Oct. 23 at 5:30 p.m. – Virtual
- § Oct. 24 at 4 p.m. – BOOnion Station Trick-or-treat Street at DUS
- § Oct. 26 at 3 p.m. – Weber Elementary School Trick-or-Treat Street
- § Oct. 29 at 4 p.m. – E Line Customer Appreciation Event (Lincoln Station)
- § Oct. 30 at 4 p.m. – E Line Customer Appreciation Event (Arapahoe at Village Center Station)

*\*Language assistance and effective communications*



# Community Outreach and Engagement

§ Comprehensive, multi-lingual marketing and outreach strategy implemented in September 2024

- Mass email sent to 850+ community partners, non-profits, neighborhood organizations, churches, etc.
- Three separate news releases sent to regional media outlets



## Community Outreach and Engagement (cont'd)

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- Utilized Multicultural Outreach and Engagement Services Contract to inform the public
  - Distribution via Community Partners
    - Nine multicultural events engaging 944 community members
    - Montbello Muse and Servicios de La Raza newsletters
    - Denver Public Library



# Conclusion

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§ Title VI concerns are minimal

§ Route-level Findings

- No practical alternatives to avoid, minimize, or mitigate
- Minimal differences between comparator groups

§ Network-level Findings

- No disparate impact/disproportionate burden impacts
- Equity populations stand to benefit more compared to non-equity populations
- Increased access to key activity centers





# Recommendation

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- § FTA requires the agency's Board of Directors be made aware, consider and approve the equity analysis prior to the agency taking action
- § January 2025 Title VI service equity analysis approval



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[rtd-denver.com](http://rtd-denver.com)



# **RTD 2025-2028 Title VI Program**

## **Attachment O: September 2024 Service Equity Analysis**

DRAFT

# BOARD OF DIRECTORS REPORT

## September 2024 Title VI Service Equity Analysis

Committee Meeting Date: July 24, 2024
Board Meeting Date: July 30, 2024

### RECOMMENDED ACTION

For the Board of Directors (Board) to adopt the Title VI Service Equity Analysis report for the September 2024 service changes to comply with federal laws, regulations, and guidelines related to Title VI of the Civil Rights Act of 1964.

### STAFF REPRESENTATIVE

Martin Romero, Transit Equity Manager, Civil Rights Division  
Carl Green Jr., Director, Civil Rights Division  
Jessie Carter, Senior Manager, Service Development

### PRESENTATION LENGTH

15 minutes

### BACKGROUND

The 38 service changes proposed for September 2024 facilitate opportunities for bus and rail operators to select new work assignments and for the Service Development Division to adjust the overall operations plan for the transit network. Additionally, with the Board’s adoption of the Reimagine RTD System Optimization Plan (SOP), several of the service change proposals reflect the first phases of SOP implementation to provide the best possible value to customers.

The Board-adopted guidance for proposed service changes continues to be:

- Service performance evaluation based on service standards
- Maintaining the overall integrity of the transit network and on transit dependent markets
- Making alternative services available to affected customers
- Cost-effective distribution throughout the District and Family of Services and the ability to enhance service when possible
- Compliance with Title VI of the Civil Rights Act: benefits and services are provided without regard to race, color or national origin; also, there is no disparate impact on minority populations, nor a disproportionate burden on low-income populations
- Response to changes in the communities where services are provided

### Service Equity Analysis Requirements of Title VI of the Civil Rights Act

The Federal Transit Administration’s (FTA) Circular 4702.1B provides its recipients of 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. The September 2024 service change proposal includes one major service change out of 38 total changes. Thus, an analysis is required to be brought before the Board for its consideration. The complete Title VI Service Equity Analysis report is included in Attachment A.

Title VI Service 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 the foundational requirements for evaluating service change proposals for equity. These policies and their applicable thresholds are listed below:

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 12 or more months. All major service changes will be subject to an equity analysis.

Title VI Policies

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.

Disproportionate Burden Policy: 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.

**DISCUSSION**

Staff proposes changes to 32 bus routes and six rail lines in the forthcoming September 2024 service change. Of these 38 changes, one service has proposed additions or reductions to service 25% greater than that of baseline service and thus meets established thresholds for a major service change. That route is shown in bold in the following table.

<b>Modified Services (35 services)</b> <i>(Additional trips, expanded service spans)</i>	O/OB, 3, 3L, 6, 11, 19, 20, 24, 30, 38, <b>40</b> , 49, 51, 65, 73, 88, 88L, 93L, 120L, 204, 205, 225, AB, BOUND, DASH, Free MallRide, Jump, NB, P, SKIP, D Line, E Line, H Line, W Line, R Line
<b>Reinstatement</b>	L Line
<b>Reduced Service</b>	OL
<b>Temporary Suspended Service</b>	Free MetroRide

Methodology

Disparate impact and disproportionate burden analyses were performed at the route/line level, route/line block group and network level to identify any potential disparities in service changes based on race/ethnicity or income.

#### Summary of Findings:

- A potential disparate impact was identified at the individual route level: the one route/line that had major service changes, Route 40, had a potential disparate impact finding.
- The proposed major service change was examined, at the network level, to determine overall impacts to equity (i.e., minority and low-income) populations compared to non-equity (i.e., non-minority and non-low-income) populations. However, the systemwide service increase findings mirror the route analysis for Route 40 due to being the sole major service change.

At the network level, service changes (service increases solely on Route 40), **minority populations stand to benefit less than non-minority populations** (1.37% vs. 1.74%, respectively). This difference falls below the disparate impact threshold of 1.56%. Therefore, the proposed major service increase results in a system-level disparate impact. However, **low-income populations stand to benefit slightly less than non-low-income populations** (1.57% vs. 1.62%, respectively). The difference does not fall below the 10% disproportionate burden threshold of 1.46%. Therefore, no system-level disproportionate burden is found with the proposed major service increase.

#### Conclusions

Although the major service change has resulted in a potential disparate impact at both the route and network levels, RTD recommends keeping the September 2024 major service change plan as proposed, as there are no practical alternatives to avoid, minimize or mitigate the disparate impact (Route 40). The substantial legitimate justification for the Route 40 service improvement follows RTD Board approval of the SOP, which recommends frequent service levels along the entire Route 40 corridor between 40th• Colorado Station and Southmoor Station. Moreover, the improvement also ensures there is a Collective Bargaining Agreement-compliant restroom at each terminal. Thus, providing the substantial legitimate justification for the service improvement.

Additionally, the overall potential benefits to customers of the proposed overall service plan are significant, with a large benefit to minority and low-income customers. Specifically, a total of five of the six minor changes (of the 38 service changes, only those routes with non-cost-neutral impacts to hours), are considered low-income-serving bus routes, and a total of two out of six are considered minority-serving bus routes. Other minor changes include improvements to on-time performance for 15 bus routes, reinstatement of fall/winter tripper service on eight routes, three individual implementations of the SOP, and four changes related to finalization of the Downtown Rail Reconstruction Project.

In adopting this report, the agency seeks to meet the 2021-2026 Strategic Plan priority of Community Value while maintaining compliance with Title VI federal regulations. RTD will continue to assess the equity implications for all subsequent service change proposals and will propose adjustments and service alternatives as appropriate in future service change recommendations.

## FINANCIAL IMPACT

The adoption of the Title VI Service Equity Analysis will not result in any direct or foreseeable financial impacts.

### ATTACHMENTS:

- Attachment A Title VI Service Equity Analysis Report for Sep 2024 Runboard Proposal Final (PDF)
- Attachment B September 2024 Service Equity Analysis Recommended Action Item (PPTX)

**RESULT:** PASSED [UNANIMOUS]

**MOVER:** Julien Bouquet, Director, District G

**SECONDER:** Troy Whitmore, Director, District K

**AYES:** Bouquet, Broom, Buzek, Catlin, Davidson, Dishell, Guissinger, Guzman, Harwick, Lewis, Rosenthal, Ruscha, Sloan, Tisdale, Whitmore

Prepared by:

Martin Romero, Transit Equity Manager

Approved by:

  
Carl Green Jr., Director, Civil Rights 7/16/2024

Authorized by:

  
Debra A. Johnson, General Manager and CEO 7/19/2024



# **Title VI Service Equity Analysis Report**

**September 2024 Service Changes**

# Service Equity Analysis: September 2024

## Contents

Executive Summary .....	2
<i>Methodology</i> .....	2
<i>Major Service Changes</i> .....	2
<i>Findings</i> .....	2
Introduction .....	3
<i>Title VI and Environmental Justice</i> .....	3
<i>Service Change Philosophy</i> .....	3
<i>RTD’s Title VI Equity Analysis Policies</i> .....	4
Analysis .....	5
<i>Data Sources and Methodology</i> .....	5
<i>Public Outreach Overview</i> .....	6
<i>Major Service Change, Disparate Impact and Disproportionate Burden Analyses</i> .....	7
Changes by Transit Mode .....	7
<i>Major Service Change Review</i> .....	8
Major Service Change Reductions .....	8
Major Service Change Increases .....	8
Route- and Line-Level Analysis .....	8
Systemwide Analysis .....	9
Summary of Findings .....	15
Appendix A: Systemwide Service Changes	
Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores	

# Service Equity Analysis: September 2024

## Executive Summary

This document summarizes the analysis of major service changes proposed for the **September 2024** runboards to ensure that the changes will not inequitably impact 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 proposes changes to **38** bus route/patterns of RTD’s forthcoming **September 2024** runboard. Of this change, **one** service met the established threshold for a major service change. The route tabulated below has proposed adjustments to service that were greater than 25% of baseline service and are proposed for the long-term (will remain in effect for 12 or more months).

<b>Service Adjustments (1 service)</b>	<b>Route 40:</b> Improve headways to 15 minutes weekday mornings through evenings along the entire route.
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### Findings

Major service changes included in the proposed **September 2024** service changes include only the improvement of service levels of Route 40. This route serves populations in east Denver that are below the district average of minority populations and just under the district average for low-income populations.

When considering the demographics within the service area (within a quarter mile) of the major service increase and as a proportion to the district overall, low-income populations received a slightly lower increase in service (i.e., were less positively impacted) compared to non-low-income populations. Low-income areas received 0.02% less of a benefit than non-low-income areas. However, this difference does not meet the 10% disproportionate burden threshold. Minority areas received less of an increase in service (i.e., were less positively impacted) compared to non-minority populations. Minority areas benefitted 0.15% less than non-minority areas, a difference falling below the 10% disparate impact threshold. Thus, a potential disparate impact was identified at the route level for the changes proposed for Route 40. The systemwide service increases findings mirror the route analysis for Route 40 due to the Route 40 being the sole major service change.

# **Service Equity Analysis: September 2024**

## **Introduction**

### **Title VI and Environmental Justice**

Equity is a core principle of RTD's functional mission to provide mass 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 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 current and proposed runboards. Routes with major service changes include one major increase and one reinstatement of a formerly suspended route pattern. These changes and all others have been reviewed individually at the route/line 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/lines, the elimination of existing routes/lines and changes to the alignment and trip frequency within existing routes/lines. RTD has established principles to identify the service changes needed to meet the diverse travel needs of those within the district and maintain a high-performance, sustainable transit system.

# Service Equity Analysis: September 2024

## RTD Service Changes Guiding Principles

- Service performance evaluation based on 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
- Compliance with 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
- Response to changes in the communities where services are provided

RTD services are divided into various service classes (the “Family of Services”) 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 agency’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 agency 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.

*Colorado Revised Statutes 32-9-119.7 Farebox Recovery Ratios – Plans*

## RTD’s Title VI Equity Analysis Policies

Based on requirements within FTA Circular 4702.1B Chapter IV.7, RTD, as an agency receiving federal funding, 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% addition or reduction in the service hours of any route that would remain in effect for 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.

# Service Equity Analysis: September 2024

2. **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.
3. **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. A low-income population is a group of households who are at or below 150% 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 and Methodology

Demographic data used for this analysis comes from the Census Bureau's American Community Survey (ACS) 5-Year Estimates for years 2018 to 2022 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 2024** 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 quarter-mile service area of a bus route or rail line. These proportional differences were compared against district population proportions of equity populations and route/line proportions of equity populations.

Low-income status for population within the district is derived from Census Bureau population estimates 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 three. Minority status is based on the non-white and Hispanic or Latino count of total population. The service area is based on the collection of block groups wholly or partially within district boundaries.

Route/line service area population is determined using a quarter mile "catchment area" centered around bus stops and rail stations. This catchment area is then used to calculate the percentage overlap of block group-based population underneath. For instance, if a catchment area contains 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 calculates the net change in service hours for each route/line proposal to provide the percent difference from baseline service hours. Any change meeting or exceeding a 25% change (either positive or negative) from baseline is flagged as a major service change for further review.

# Service Equity Analysis: September 2024

## Public Outreach Overview

Six public meetings were conducted between June 18-26, 2024. No comments regarding the major service change were collected during these meetings. Table 1 captures the meeting locations, dates, and number of attendees.

The Communications and Engagement department produced a recorded webinar and downloadable toolkits, which were provided to community-based organizations. Efforts were made to increase the use of social media platforms, and in-system promotional assets were used to inform the public about the service changes. RTD's newly formed Impact Team was deployed to inform and gather feedback at stops and stations.

The public was also notified of the ability to submit comments to [service.changes@rtd-denver.com](mailto:service.changes@rtd-denver.com), by phone at 303-299-6000 and by fax at 303-299-2227.

*Table 1. Public meeting details*

Date and Time   Location	Comment Themes	Number of Attendees
June 18 at 12 p.m.   Virtual	No comments on the major service changes	7
June 18 at 5:00 p.m.   1325 W 11 <sup>th</sup> Ave, Denver, CO, 80204	No comments on the major service changes	2
June 20 at 5:30 p.m.   1660 Blake St, Denver, CO, 80202	No comments on the major service changes	1
June 22 at 5:00 p.m.   2401 E Colfax Ave, Denver, CO, 80206	No comments on the major service changes	1
June 24 at 5:30 p.m.   Virtual	No comments on the major service changes	7
June 25 at 5:00 p.m.   1000 Englewood Pkwy, Englewood, CO, 80110	No comments on the major service changes	7
		<b>Total – 25</b>

In addition to the public meetings, the Transit Equity Office contacted 67 key public activity centers within a quarter mile of Route 40. These entities were informed of the proposed major service change, provided with instructions on how to offer feedback, and encouraged to attend the open houses.

The Transit Equity Office collaborated with three community-based organizations (CBO) to share information and collect feedback virtually and in-person. Of note, one CBO attended a community event and conducted direct outreach along the Route 40 corridor. A total of 39 customers responded to the survey administered by the CBO. Four additional survey responses were collected via the Service Changes website bringing the total survey responses for the Route 40 to 43. Of these 43 responses, 41.5% stated that the change has no impact on them, 14.6% indicated it has a somewhat positive impact, and 41.5% stated it is a very positive change. Table 2 captures the common themes of the feedback received and the total responses.



# Service Equity Analysis: September 2024

Table 2. Direct Survey Feedback

Route 40	This is amazing!
	Moring and evenings are vague. Suggest stating 7am- 8pm. Would love to see a limited 40
	Great change
	Would love to see this level of service on the weekends as well
Total Responses – 43	

## Major Service Change, Disparate Impact and Disproportionate Burden Analyses

Proposed service changes for the **September 2024** runboard that resulted in a 25% or greater change in service were categorized by equity population (minority or non-minority, low-income or non-low-income) for comparison. Routes were categorized as either equity or non-equity based on their identification within the prior (current) network using 2018-2022 ACS five-year demographic data.

A comparative, proportional equity analysis was completed to review the route/line individually. This analysis identified the equity and non-equity populations within a route/line service area and compared those against the equity and non-equity populations of the district. If impacted equity populations within the route/line service area received 10% or greater impacts compared to non-equity populations, the route/line had a potential finding of disparate impact (for minority populations) or disproportionate burden (for low-income populations) and was flagged for a potential finding of impact.

**Major Service Change Test**  
Identify routes with proposed major service changes (based on trips or hours) of 25% or more

## Changes by Transit Mode

For the **September 2024** runboard, 32 bus routes and six rail lines will undergo various service changes. Of these, **6** routes will see combined increases in **bus service of over 115 total weekday revenue service hours and 51 additional weekend service hours**. While temporary and technically not meeting major service change requirements, with the ending of the Downtown Rail Reconstruction Project the discontinuation of temporary service on the Free MetroRide with reinvestment of its resources into improving Free MallRide service levels is a combined cost neutral change. The improvement of service on the Free MallRide allows for service every 5 minutes between Denver Union Station and Civic Center Station along an updated alignment along 15<sup>th</sup> and 17<sup>th</sup> Streets. The L Line is also proposed to resume operations downtown in September.

Table 3. Summary of service changes by transit mode

Mode	Change in Weekday Daily Hours
All Bus	+115
All Rail	0
Overall	+115

# Service Equity Analysis: September 2024

## 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/lines prior to individual review of routes/lines, route/line block groups and overall network levels; equity grouping comparison occurred at every level. Major service changes are categorized as the following:

- **Major Service Reductions** (a service reduction of 25% or more)
- **Major Service Increases** (service increases of 25% or more related to new or restructured service)

### Major Service Change Reductions

There are no major service reductions proposed for the proposed **September 2024** runboard.

### Major Service Change Increases

One bus route, the Route 40, had a proposed major service increase which includes service increases of 25% or greater. Improved headways are proposed on Route 40 for the **September 2024** runboard as outlined in the RTD Board approval of the Systemwide Optimization Plan (SOP).

### Route- and Line-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/line individually to determine potential disparate impacts (DI) and/or disproportionate burdens (DB). 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/line with a major service change, determine the percent of the route's/line'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 DI or DB findings. For service increases, the following analysis examines the extent to which the benefits of the improvements are inclusive of minority and low-income populations. Because these are proposed service increases, protected populations falling below these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, food and social services for minority and low-income populations.

#### Route 40

*Proposal: As outlined in the RTD Board-approved System Optimization Plan (SOP), it is proposed to implement 15-minute headways weekdays, mornings through evenings, along the full corridor. This also ensures there is a Collective Bargaining Agreement compliant restroom at each terminal.*

As shown in **Table 4**, a slightly lower percentage of the district's low-income population stands to benefit from the proposed major service increase as compared to non-low-income population (0.99% vs. 1.01%, respectively). However, this difference falls below the 10% disproportionate burden threshold (0.91%). Therefore, no potential route-level disproportionate burden is found. However, a lower percentage of the

# Service Equity Analysis: September 2024

district's minority population benefits from the proposed major service increase as compared to the non-minority population (0.91% vs. 1.06%, respectively). This difference falls below the 10% disparate impact threshold (0.95%). Thus, there is a potential disparate impact found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

Table 4. Route 40 Disparate Impact and Disproportionate Burden Analysis

Route 40 - Colorado Boulevard				
May 2024 to September 2024 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>20,315</b>	<b>10,456</b>	<b>26,183</b>	<b>4,246</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	98.94%	99.09%	98.99%	99.01%
<b>% District Impacted</b>	<b>1.06%</b>	<b>0.91%</b>	<b>1.01%</b>	<b>0.99%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
DI & DB Thresholds Are 90% for service increases and 110% for service decreases of % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	<b>0.95%</b>	<b>0.91%</b>	<b>0.91%</b>	<b>0.99%</b>

The improvement of service would increase access to:

- About 44,340 jobs
  - 51.3% low-to-medium wage jobs, which is above the RTD District average (45.1%)
  - 17.1% jobs held by minorities, which is above the RTD District average (13.6%)
  - 18.3% jobs held by Hispanic/Latino workers, which is above the RTD District average (17.9%)
- 119 retail/convenience stores
- 66 human and social services centers
- 9 senior housing and facilities
- 27 colleges, middle schools and elementary schools

## Systemwide Analysis

In accordance with RTD's 2022 Title VI Program Update, a systemwide analysis is required in addition to route- and line-level analyses. A system level analysis provides further understanding of changes to service levels for Title VI protected populations at aggregate levels.

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 are 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).

# Service Equity Analysis: September 2024

The analysis of all service changes identified the following:

- Systemwide, bus service increases by over 115 weekday revenue hours
- Of the over 31,000 people served by stops within the service area with major service changes, equity populations represented an average share of population compared to district averages. Of this total, nearly 4,300 low-income people and nearly 10,500 minorities would receive service improvements.
- At the systemwide level, equity routes and non-equity routes<sup>1</sup> were compared only for those with major service changes. The one bus route with major service increases serves slightly below-average low-income and minority populations and is not classified as an equity route.

**In review of the proposed Route 40 changes at the systemwide level, there is a potential disparate impact finding.**

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 **May 2024** to **September 2024** 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 on-low-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 (14.2%) and minority population (37.5%).

Determine which block groups experienced service changes of 25% or more.

Of block groups with a major service change, compare the difference in population for equity versus non-equity block groups; if the difference is more than 10%, review for potential adverse impacts.

There are 2,197 block groups defined as being wholly within or mostly within the District.<sup>2</sup> Using the 2018-2022 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 37.5% was derived by using the base population of the service area (3.064 million), the low-income population percentage of 14.2% is derived from a slightly smaller population figure (3.02 million). This is due to the smaller population whose poverty status the Census Bureau can determine.<sup>3</sup> The thresholds summarized in **Table 4** yielded 824 (37.5% of all) block groups above the district average for low-income population, and 846 (38.5%) block groups above the district average for minority population.

<sup>1</sup> Based on existence of the route within the May 2024 network and the population within a quarter mile of bus stops or rail stations. 2018-2022 5-Year ACS estimates were used for population identification.

<sup>2</sup> Some block groups are not completely contained within district boundaries due to differences in boundaries between the District and Census-defined geographies.

<sup>3</sup> The total population whose poverty status is determinable/assessed is lower than the estimate of total population due to the inability of the Census to determine income for everyone estimated to reside in a particular block group.

# Service Equity Analysis: September 2024

Table 5. District averages; NTD 2023; ACS 2018-2022 5-year estimates

Service Area (sq. mi.)	Total Block Groups	Total Population	Percent Minority	Total Population (assessed)	Percent Low-Income
2,342	2,197	3,064,553	37.5%	3,020,954	14.2%

The proposed major service changes were examined in aggregate by transit mode to determine overall impacts to underlying population. **Table 6** summarizes the change in service for total block group populations underlying the bus stops with proposed major service increases proportionally compared to population in the District. There are no proposed service decreases. The 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. For the proposed runboard, systemwide service increases mirror the route analysis for Route 40 due to the Route 40 being the sole major service change.

No major service changes (longer than 12 months) were proposed for rail services with the **September 2024** runboard.

Table 6. Systemwide disparate impact and disproportionate burden equity analysis summary for all major service increases

Systemwide Disparate Impact and Disproportionate Impact Analysis: All Increases				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
Impacted Block Group Population	33,296	15,749	41,916	6,746
District Population	1,915,350	1,149,204	2,590,598	430,356
District Total	3,064,553		3,020,954	
% District Population Not Impacted	98.26%	98.63%	98.38%	98.43%
% District Population Impacted	1.74%	1.37%	1.62%	1.57%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB thresholds are 90% for service increases & 110% for service decreases	DI Threshold	Minority Pop Impacted	DB Threshold	Low Inc. Pop Impacted
	1.56%	1.37%	1.46%	1.57%

For system-level service changes (service increases solely on Route 40), **minority populations stand to benefit less than non-minority populations** (1.37% vs. 1.74%, respectively). This difference falls below the disparate impact threshold of 1.56%. Therefore, a system-level disparate impact finding is found with the proposed major service increase. **Low-income populations stand to benefit slightly less than non-low-income populations** (1.57% vs. 1.62%, respectively). The difference does not fall below the 10% disproportionate burden threshold of 1.46%. Therefore, no system-level disproportionate burden is found with the proposed major service increase.

**Figures 1 and 2** illustrate the locations of above average low-income and minority block groups within the District as well as highlight services with major service changes (orange). Compared to the District overall, Route 40 serves populations in east Denver close to but below district averages for minority and low-income populations.



# Service Equity Analysis: September 2024

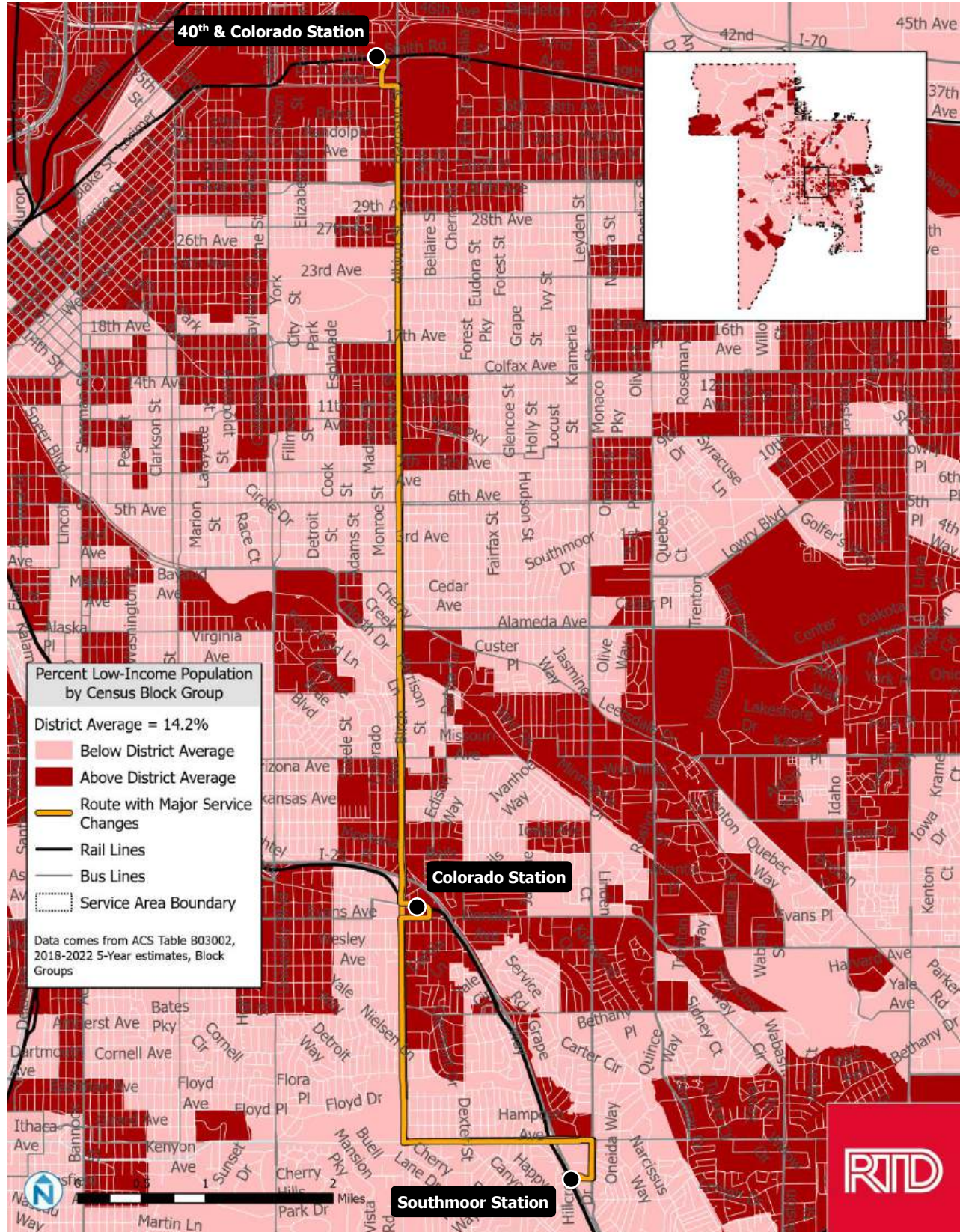


Figure 1. Block groups with above-average low-income population and routes with major service changes; US Census Bureau 2018-2022 5-Year Estimates



# Service Equity Analysis: September 2024

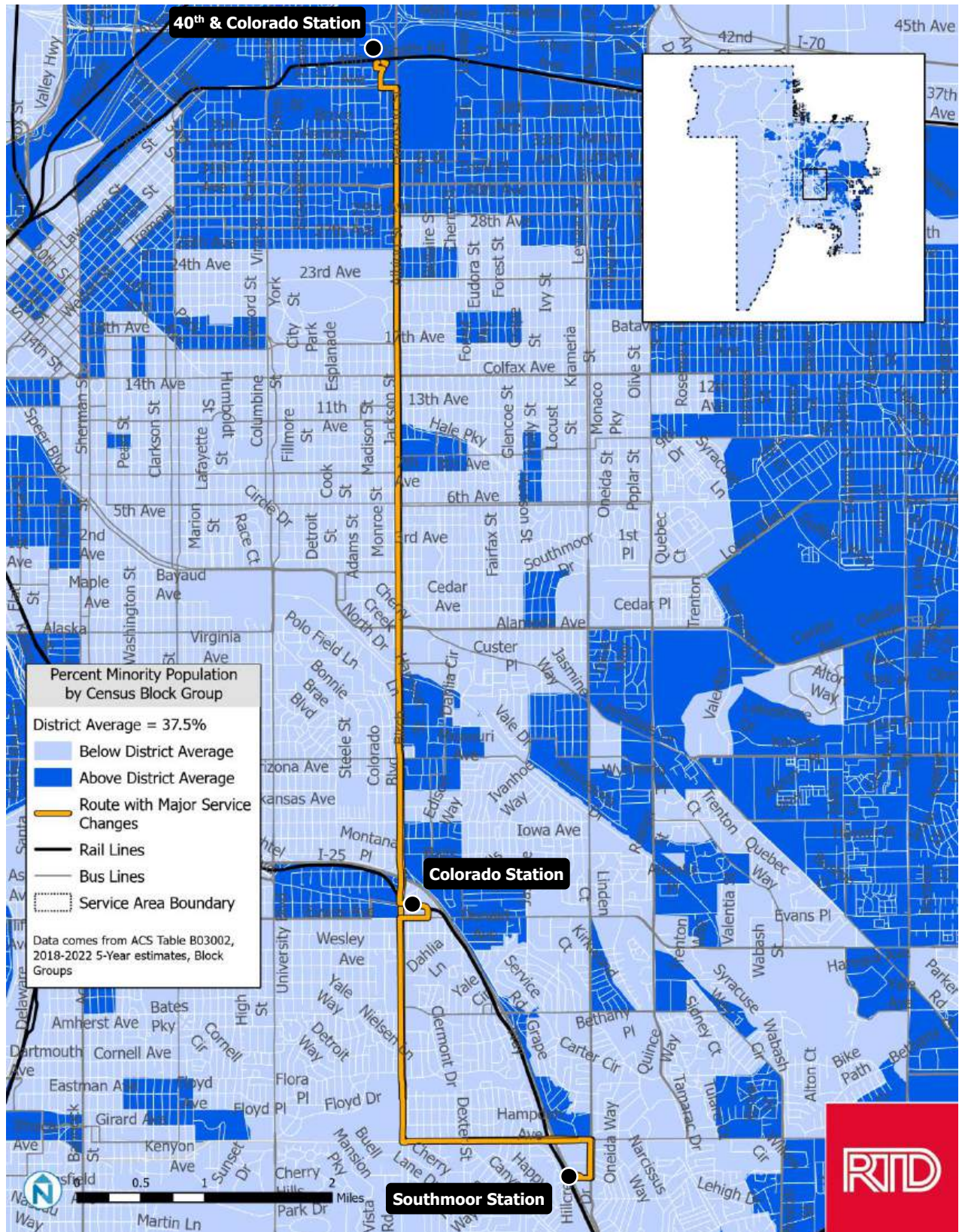


Figure 2. District block groups with above-average minority population and routes with major service changes; US Census Bureau 2018-2022 5-Year Estimates



# Service Equity Analysis: September 2024

Major service changes from **May 2024** to **September 2024** are captured in **Figure 3**. This map provides a generalized view of where service is changing at the route pattern level. The current bus network is shown with the change in service levels colored according to the percentage change in service hours. Route 40 is shown in teal (36% service change). All other bus routes, shown in gray, are proposed to undergo minimal (e.g., schedule adjustments, minor realignments) or no service changes in **September 2024**.

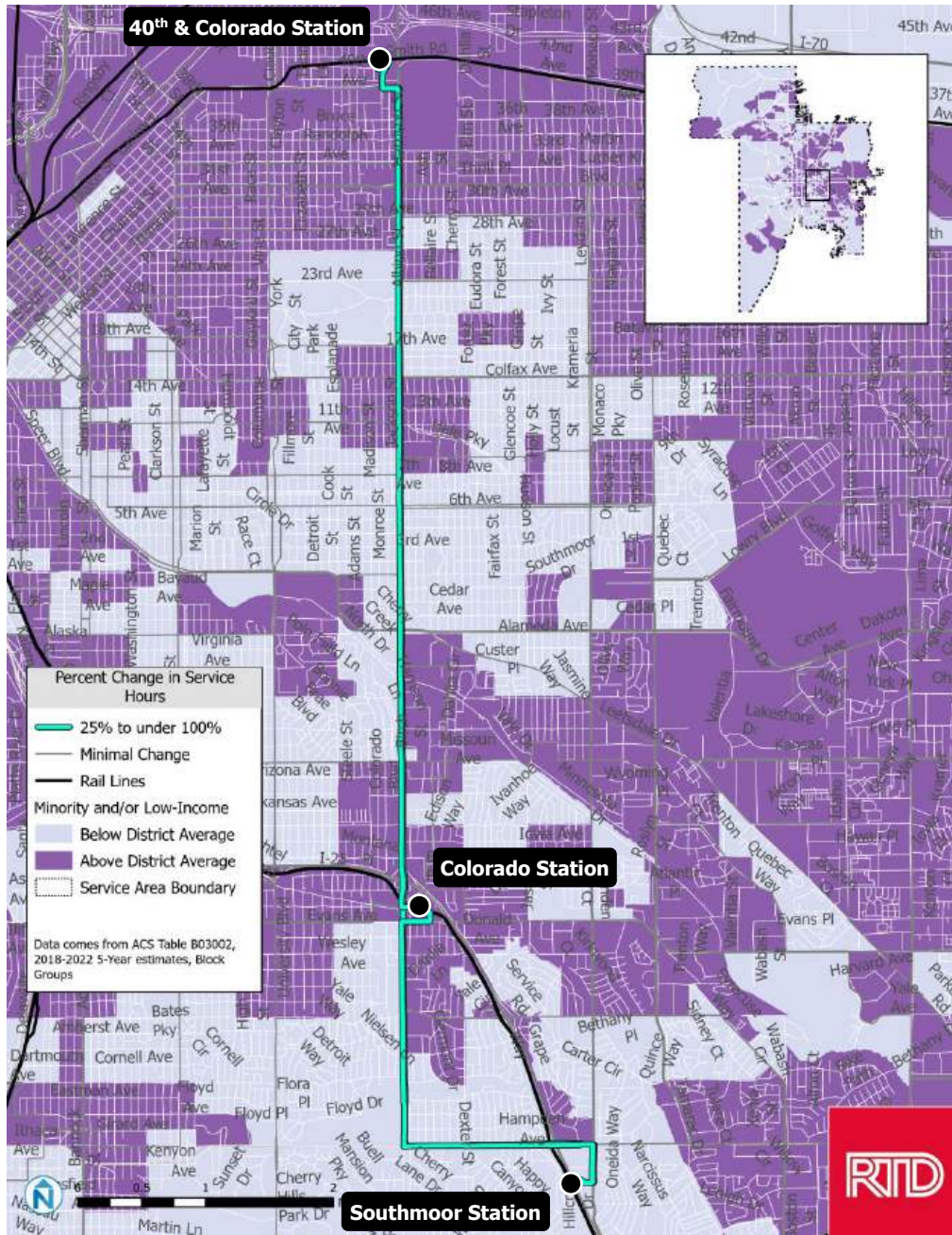


Figure 3. Depiction of route changes by percent change in service hours

# Service Equity Analysis: September 2024

## Summary of Findings

The systemwide service modifications proposed between **May 2024** and **September 2024** include schedule adjustments, suspension of school trips, changes to fall/winter schedules and trip availability and additional service. The sole major service change proposed for this runboard was for service increases on Route 40.

### Route-level Findings:

- Of the 38 total services with proposed changes, taken individually, **one had a potential finding**
- **Route 40 has a potential disparate impact** finding due to minority populations receiving 0.15% less benefit than non-minority populations. Low-income populations benefited 0.02% less than non-low-income populations but the difference did not meet the disproportionate burden threshold

**Table 7** 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 7. Summary of major service changes by change type and impact

Service Change Type	Route	Potential Disparate Impact?	Potential Disproportionate Burden?	Service Change Pct
Increase	Route 40	Yes	No	36%

### Systemwide-level Findings:

- Route 40 comprises the September 2024 runboard’s only major service change
- Almost 31,000 people live near Route 40 bus stops. Both minority and low-income populations are represented at slightly lower shares of the population than district averages (34% and 14%, respectively). **Low-income populations received a slightly lower benefit (were less positively impacted) compared to non-low-income populations.** Low-income areas benefited 0.02% less compared to non-low-income areas. However, this difference did not fall below the disproportionate burden threshold. **Minority populations received a lower benefit (were less positively impacted) compared to non-minority populations.** Minority areas benefited 0.15% less compared to non-minority areas. This difference fell below the disparate impact threshold; therefore, **a system-level disparate impact was found with the proposed change**
- When considering the proposed service increase on Route 40 for the nearly 50,000 people within the block groups that include the route’s stops and as a proportion to the district overall, **minority populations stand to benefit less compared to non-minority populations.** Minority population areas received 0.37% less of a benefit compared to non-minority areas. The difference was below the disparate impact threshold by 0.19%; therefore, **a potential systemwide disparate impact was found. Low-income populations received 0.05% less of a benefit than non-low-income populations.** The difference was 0.11% above the threshold for a potential disproportionate burden; therefore, no potential disproportionate burden was found with the proposed service decrease

# Service Equity Analysis: September 2024

## 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 initially proposed **September 2024** service changes<sup>4</sup> include an improvement in service levels along Route 40 which serves low-income populations at a below average rate than as the District average.

RTD recommends keeping the **September 2024** service plan as proposed as there are no practical alternatives to avoid, minimize or mitigate the disparate impact (Route 40). The substantial legitimate justification for the Route 40 service improvement follows RTD Board approval of the System Optimization Plan (SOP) which recommends frequent service levels along the entire Route 40 corridor between 40<sup>th</sup> and Colorado Station and Southmoor Station. Moreover, the improvement also ensures there is a Collective Bargaining Agreement compliant restroom at each terminal. Thus, providing the substantial legitimate justification for the service improvement.

Additionally, the overall potential benefits to customers of the proposed overall service plan are significant with a large benefit to minority and low-income customers. Specifically, a total of 5 of the 6 minor changes (of the 38 service changes, just those routes with non-cost-neutral impacts to hours) are considered low-income-serving bus routes and a total of 2 out of 6 are considered minority-serving bus routes. Other minor changes include improvements to on-time performance for 15 bus routes, reinstatement of fall/winter tripper service on 8 routes, 3 individual implementations of the SOP, and 4 changes related to finalization of the Downtown Rail Replacement Project.

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<sup>4</sup> <https://www.rtd-denver.com/service-changes>

# Service Equity Analysis: September 2024

## Appendix A: Systemwide Service Changes

Change Type	Service Changes	
	Route	Description
<b>Modified</b>	<b>0/0B</b>	As described in the RTD Board-approved Systems Optimization Plan (SOP), it is proposed to separate the Route 0 into two separate route services to improve reliability and better match service levels to customer utilization. The new <b>Route 0 - Broadway</b> would operate north of Englewood Station to Civic Center Station, while the new <b>Route 0B – South Broadway</b> service would operate between Englewood Station and Highlands Ranch Town Center.
	<b>3</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed for weekday and Saturday service.
	<b>3L</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	<b>6</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed for weekday and Saturday service.
	<b>11</b>	Reinstate seasonal fall/winter service levels.
	<b>19</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for Saturdays only.
	<b>20</b>	Reinstate seasonal fall/winter service levels.
	<b>24</b>	Reinstate seasonal fall/winter service levels.
	<b>30</b>	Reinstate seasonal fall/winter service levels.
	<b>38</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed for weekdays, Saturday and Sunday services. It is also proposed to relocate the western terminal of the route to the new Lutheran Hospital campus in Clear Creek Crossing.
	<b>40</b>	As outlined in the RTD Board-approved System Optimization Plan (SOP), it is proposed to implement 15-minute headways weekdays, mornings through evenings, along the full corridor. This also ensures there is a Collective Bargaining Agreement compliant restroom at each terminal.
	<b>49</b>	It is proposed to adjust departure times to allow for better connectivity at Commerce City & 72nd Avenue Station.
	<b>51</b>	Reinstate seasonal fall/winter service levels.
	<b>65</b>	Reinstate seasonal fall/winter service levels.
	<b>73</b>	Reinstate seasonal fall/winter service levels.
	<b>88</b>	It is proposed to adjust departure times at Commerce City & 72nd Avenue Station to allow for better connectivity with the N Line.
	<b>88L</b>	It is proposed to adjust departure times at Commerce City & 72nd Avenue Station to allow for better connectivity with the N Line.
	<b>93L</b>	It is proposed to adjust trip arrive and leave times at Thornton Crossroads & 104th Avenue Station for better connections between bus and rail, for weekdays, Saturdays and Sundays.
	<b>120L</b>	It is proposed to adjust the trip arrive times at Eastlake and 124th Ave Station to allow better connections to/from Route 120 as well as to/from N Line, for weekdays, Saturdays, and Sundays.



# Service Equity Analysis: September 2024

Change Type	Service Changes	
	Route	Description
	<b>204</b>	Due to road closures related to road construction along 19 <sup>th</sup> Street, between Quince Avenue and Violet Avenue, March 2024 through Winter 2026, Route 204 will have to detour via Quince Avenue, Broadway and Violet Avenue. Route 204 will be detoured from Wednesday, March 6 through Wednesday, December 30, 2026 due to these closures. Affected stops northbound: 19th St & Riverside Ave (#10389) 19th St & Upland Ave (#10392) Available alternate stops: 19th St & Poplar Ave (#10388) 19th St & Avocado Rd (#10365) Southbound routing is not expected to see any changes.
	<b>205</b>	It is proposed to adjust the 4:07pm northbound trip, from Downtown Boulder Station, to 4:05pm leave time to allow better balance of passenger loads between Route 205 and Route BOLT, related to Boulder High School boardings along Canyon Boulevard.
	<b>225</b>	Return weekday service frequency to fall/winter service levels.
	<b>AB</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekdays, Saturdays, and Sundays/Holidays.
	<b>BOUND</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekdays only.
	<b>DASH</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekdays, Saturdays, and Sundays/Holidays. Return weekday service frequency to fall/winter service levels.
	<b>Free MallRide</b>	Contingent upon the completion of Phase 1 of the Downtown Rail Reconstruction Project the Free Mall Ride is recommended to have 5-minute service frequency restored to an updated detour routing via 15 <sup>th</sup> and 17 <sup>th</sup> Streets. Cost impacts offset by proposed cancellation of Free Metro Ride services.
	<b>JUMP</b>	Return weekday service frequency to Fall/Winter service levels.
	<b>NB</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed for weekdays only. Extend trips to Eldora Ski Resort to allow for seasonal connections.
	<b>P</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	<b>SKIP</b>	Return weekday service frequency to regular service levels.
	<b>D Line</b>	Pending completion of Phase One of the Downtown Rail Reconstruction Project, it is proposed to discontinue the detour to Denver Union Station and restore trips to Central Downtown from DUS.
	<b>E Line</b>	Pending completion of the Copping Panel Project it is recommended to restore 15-minute frequency weekdays 6:00 a.m. - 6:00 p.m., Saturday and Sunday 9:00 a.m. - 6:00 p.m.
	<b>H Line</b>	Pending completion of the Copping Panel Project and Phase One of the Downtown Rail Reconstruction Project it is recommended to restore service to central downtown and restore 15-minute frequency weekdays 6:00 a.m. - 6:00 p.m., Saturday and Sunday 9:00 a.m. - 6:00 p.m.
	<b>W Line</b>	As outlined in the RTD Board-approved System Optimization Plan (SOP), and due to increased ridership, it is recommended to restore weekday 15-minute frequency between Jeffco Government Center and Denver Union Station between 6:00 a.m. - 6:00 p.m.

# Service Equity Analysis: September 2024

Change Type	Service Changes	
	Route	Description
	<b>R Line</b>	Due to changes to E and H Lines some R Line trips need to be adjusted to allow for E and H Line service restoration.
<b><i>Reduction</i></b>	<b>OL</b>	Pending the completion of Phase One of the Downtown Rail Reconstruction Project, the midday service of the Route 0 Ltd that was provided as a part of the May 2024 Service change will be discontinued.
<b><i>Reinstatement</i></b>	<b>L Line</b>	Pending completion of Phase One of the Downtown Rail Reconstruction Project, it is recommended to restore full service on the L Line alignment.
<b><i>Suspension</i></b>	<b>Free MetroRide</b>	Contingent upon the completion of Phase 1 of the Downtown Rail Reconstruction Project it is proposed to discontinue service for the Free Metro Ride. The anticipated return of 5-minute service frequency on the Free Mall Ride will offset the need for the Free Metro Ride until resources become available to fully restore the Free Metro Ride as outlined in the System Optimization Plan. Cost impacts offset by restoration of frequency on the Free Mall Ride.



# Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores

Route 40  
Increase in service

	Employment	Total KAC	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Improved Access	Improvement in access to an estimated 44,340 jobs	238	66	9	14	5	0	8	119	17
	<div><div><div>Low/Medium Wage Jobs*</div><div><div>51.3%</div><div>45%</div></div></div></div>									
	<div><div><div>Jobs Held by Workers of Color*</div><div><div>17.1%</div><div>14%</div></div></div></div>									
	<div><div><div>Jobs Held by Hispanic/Latino Workers*</div><div><div>18.3%</div><div>18%</div></div></div></div>									
	<div><div>Route 40</div><div>District</div></div>									

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2019.



January 27, 2025



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# September 2024 Proposed Service Change

## Title VI Service Equity Analysis

Martin Romero  
Transit Equity Manager

# Outline

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- § Proposed Service Changes Summary
- § Federal Transit Administration (FTA) Requirements
- § Equity Analysis Decision Tree
- § Title VI Policies and Methodology
- § Results
- § Public Outreach
- § Conclusion and Recommendation

## Proposed Service Changes Summary

---

Modified (35 services)	0/0B, 3, 3L, 6, 11, 19, 20, 24, 30, 38, 40, 49, 51, 65, 73, 88, 88L, 93L, 120L, 204, 205, 225 AB, BOUND, DASH, Free MallRide, Jump, NB, P, SKIP D Line, E Line, H Line, W Line, R Line
Reinstatement	L Line
Reduced	0L
Temporary Suspension	Free MetroRide



# FTA Requirements for Service Changes

Proposed September 2024 Service Changes

## Title VI of the Civil Rights Act of 1964

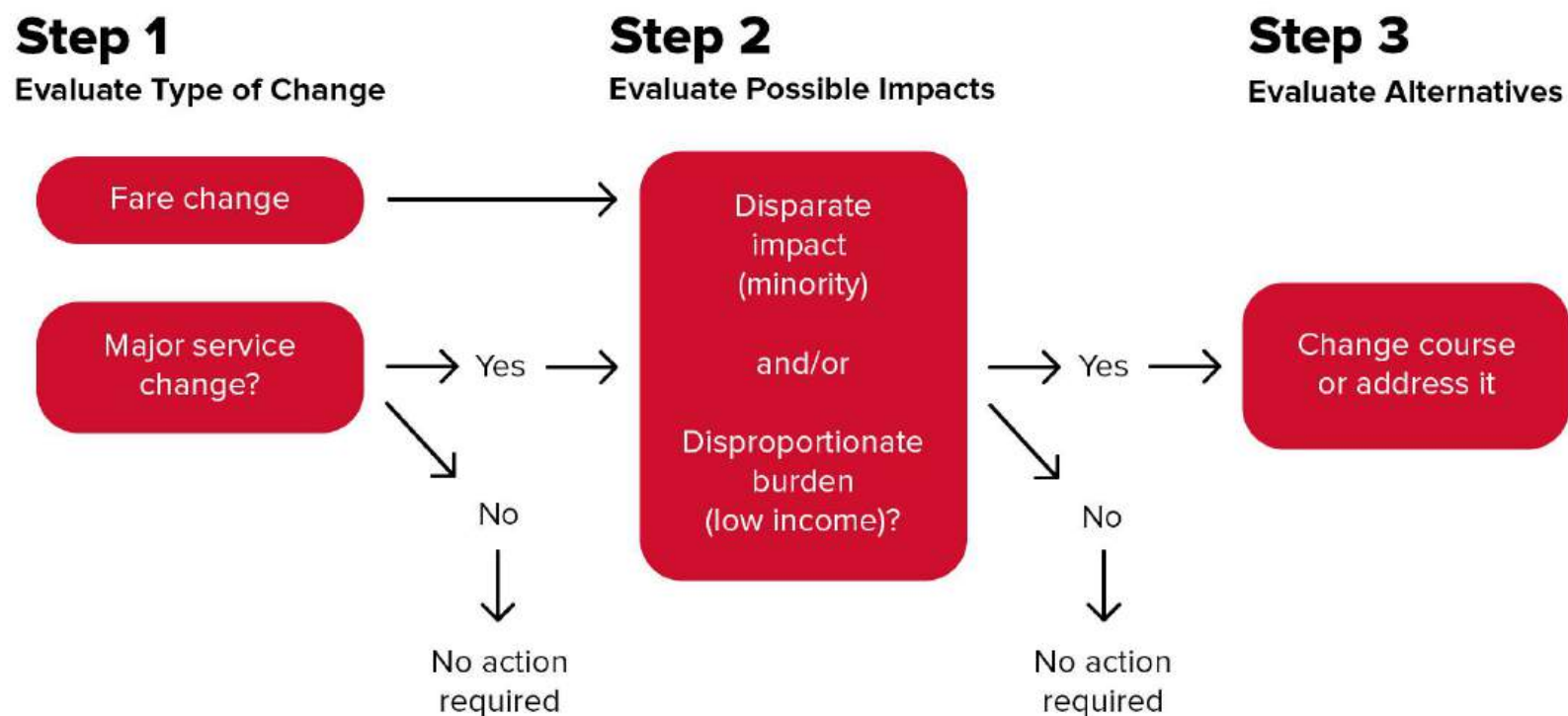
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"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

FTA Circular 4702.1B *Title VI Requirements and Guidelines* and RTD Title VI Program

# Equity Analysis Decision Tree



Minority and Low-Income = Equity Populations



# Title VI Policies

Major Service Change, Disparate Impact and Disproportionate Burden Policies



# Major Service Change Policy

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## Definition:

§ 25% + or - in the service hours of any route/line that would remain in effect for 12+ months

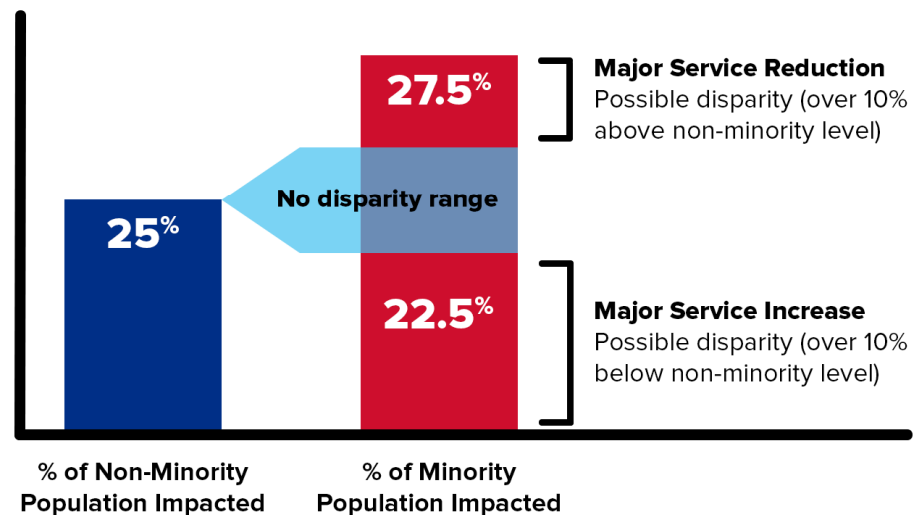
## Major Service Change Results:

§ Increase – one out of 38 met the major service change threshold

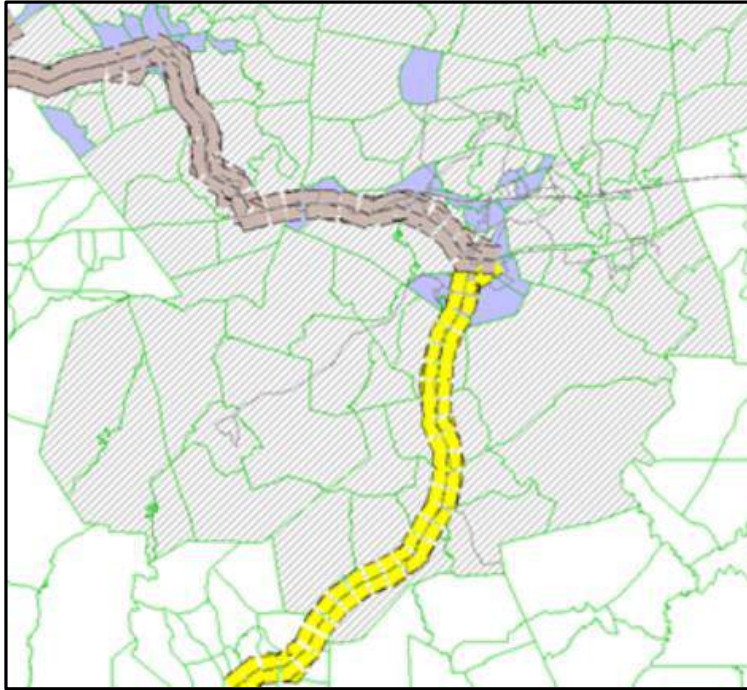
# Disparate Impact and Disproportionate Burden Policies

Title VI Policies  
=  
Thresholds to  
Evaluate Possible Impacts



## Testing for Disparate Impact at the System Level



Threshold Calculation: 10% of 25% (non-minority) = 2.5%

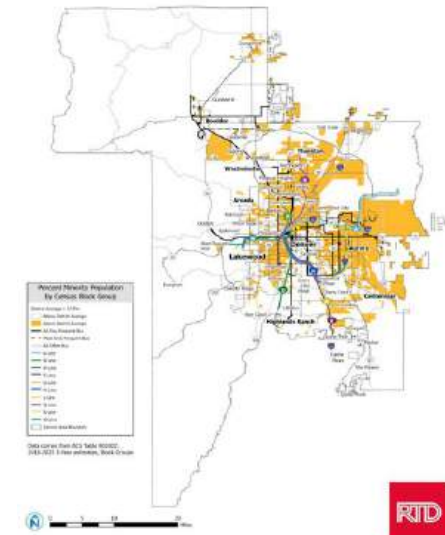


### Legend

  1/4-mile route buffer around a route

## Methodology

1. Route-level analysis applied
2. System-level analysis applied



## Route Level Results - Route 40 (Increase)

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§ Minority populations receive less of an increase in service (i.e., were less positively impacted) compared to non-minority populations

- 0.15% more benefit for non-minority groups (0.91% vs. 1.06%)
- Difference meets Disparate Impact threshold (0.95%)

§ Low-income populations stand to benefit slightly less than non-low-income populations

- 0.02% more for non-low-income groups (0.99% vs. 1.01%)
- Difference does not meet Disparate Impact threshold (0.91%)

# Key Public Activity Centers Assessment

---



**Retail and  
Convenience  
Stores**



**Schools  
PreK -  
College**



**Social  
Services**



**Senior  
Housing**



**Jobs**

## Key Public Activity Centers – Route 40

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Improved Access	Total
Jobs	44,340
Grocers	119
Social Service Centers	66
Senior Housing	9
Academic Institutions	27

## Systemwide Level Results – Route 40 (increase)

---

§ Minority populations stand to benefit less compared to non-minority populations

- 0.37% more for non-minority groups (1.74% vs. 1.37% minority)
- Difference does meet Disparate Impact threshold (1.56%)

§ Low-income populations stand to benefit slightly less compared to non-low-income populations

- 0.5% more for low-income groups (1.57% vs. 1.62% non-low-income)
- Difference does meet Disproportionate Burden threshold (1.46%)



# Public Outreach and Engagement

---

## § Public hearing and feedback meetings\*

- June 18th @ noon (Virtual)
- June 20th @ 5:30 pm (In person)
- June 25th @ 5:00 pm (In person)
- June 18 @ 5:00 pm (In person)
- June 24th @ 5:30 pm (Virtual)
- June 26th @ 5:00 pm (In person)

\*Language assistance and effective communications

## Public Outreach and Engagement (cont'd)

---

### § Comprehensive marketing and outreach strategy\*

- Webinar recording accessible online for customers and community
- Dedicated webpage and downloadable toolkits provided for community partners
- Improved utilization of social media platforms
- Feedback collected via Customer Care for customers without internet service
- In-system promotional assets and paid media
- Impact Teams

\*Language assistance and effective communications

## Public Outreach and Engagement (Cont'd)

---

### § Route 40 Direct Outreach

- Engaged 67 key public activity centers
- Leveraged three community partners
- Partnered with Village Exchange to convene members
- Focused engagement with four Denver Public Library branches

# Conclusion

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§ No practical alternatives to avoid, minimize or mitigate the findings

§ Substantial legitimate justification

- Aligns with RTD Board-approved System Optimization Plan, which adds frequent service levels along Route 40
- Enhancement improves service to low-income customers
- Adds compliant restroom at each terminal

## Recommendation

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- § FTA requires the agency's Board of Directors be made aware, consider and approve the equity analysis prior to the agency taking action
- § September 2024 Title VI service equity analysis approval

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# **RTD 2025-2028 Title VI Program**

## **Attachment P: Zero Fare for Youth Fare Equity Analysis**

DRAFT



# BOARD OF DIRECTORS REPORT

## Title VI Fare Equity Analysis and Zero Fare for Youth Program Continuation

Committee Meeting Date: July 23, 2024
Board Meeting Date: July 30, 2024

### RECOMMENDED ACTION

For the Board of Directors (Board) to concurrently adopt the continuance of the Zero Fare for Youth (ZFY) program and the Title VI Fare Equity Analysis report for the ZFY proposed fare change to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964.

### STAFF REPRESENTATIVE

Doug MacLeod, Chief Financial Officer  
Carl Green Jr, Director, Civil Rights Division  
Monika Treipl-Harnke, Senior Manager, Revenue

### PRESENTATION LENGTH

15 minutes

### BACKGROUND

During the May 14, 2024, Finance and Planning Committee, staff presented a discussion item regarding the results of the equity analysis for the ZFY program pursuant to Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration’s (FTA) Circular 4702.1B. In this circular, the FTA requires transit agencies, such as RTD, to evaluate fare changes, prior to implementation, to determine whether those changes will have a disproportionately negative impact on minority or low-income populations. The continuance of the ZFY program meets the definition of a fare change. Thus, an analysis is required to be brought before the Board for approval. The complete final Title VI Fare Equity Analysis report is included in Attachment A.

During the June 11, 2024, Finance and Planning Committee, staff presented a discussion item regarding the results of the 12-month pilot program from September 1, 2023, through August 31, 2024, with the intention of continuing the ZFY program for the following school year. The discussion item included information about increased youth boardings, estimated forgone youth revenue, and the potential for grant funding through Senate Bill 24-032 (SB032).

### DISCUSSION

In adopting the continuance of the ZFY program, the agency demonstrates its commitment to meet the Strategic Priorities of Community Value and Customer Excellence.

Staff have now completed the community outreach and public comment for the proposed fare change and final Title VI fare equity analysis. Consequently, the proposed fare change is ready for the Board’s consideration. The following discussion is divided into six sections outlining the following:

1. Final Title VI fare equity analysis findings
2. Community outreach activities
3. Feedback on Staff's recommendation
4. Final recommendation summary
5. Projected youth ridership and forgone fare revenue
6. Implementation

#### 1. Title VI Fare Equity Analysis Findings

The Average Fare Analysis uncovered no Title VI equity concerns using RTD's Board-adopted Title VI Policies, and notes that minority and low-income customers benefit more than the overall population. As a whole, minority and low-income populations experience a greater decrease in their average fare than the overall customer population. Minority customers experience a 5.2% decrease in their average fare per boarding and low-income customers experience a 5.1% decrease, compared with a 4.2% decrease experienced by the overall customer population. No groups are anticipated to see an increase in their average fare with the proposed change. As such, no mitigations are needed in order to proceed with the establishment of a longer-term ZFY program following the conclusion of the pilot.

#### 2. Community Outreach Activities

Public outreach events regarding the continuation of the ZFY program were held in conjunction with public meetings regarding the upcoming September 2024 service changes. RTD hosted five in-person open houses and one virtual public meeting between June 18-26, 2024, to communicate the proposed changes, answer questions, and collect feedback from customers, stakeholders, and the community. In addition to these public meetings, staff were available to answer questions about the proposed extension of the ZFY program during its participation at community events. The public outreach activities comport with the Federal Transit Administration's Title VI Requirements and Guidelines and are illustrated in Section 7 of the Title VI Fare Equity Analysis Report.

#### 3. Feedback on Staff's Recommendation

Through the outreach process, significant support was provided for the continuance of the ZFY program. The following themes regarding the program were present in the feedback:

- Supports youth in accessing school and work
- Benefits families who cannot afford fares for multiple children and incentivize larger families who see driving as a more affordable option
- Meets climate goals by encouraging additional ridership
- Provides youth with independence and agency
- Encourages lifelong transit use

#### 4. Final Recommendation Summary

The Board's adoption of the proposed fare structure would continue the no-cost fare for youth through August 31, 2025. For comparison purposes, the tables following provide a summary of the existing pilot fare structure alongside the fare structure for customers, ages 19 and under, without ZFY.

### Pilot Fare Structure

	ANY DESTINATION IN THE RTD SERVICE AREA
3-HOUR	\$0
DAY	
MONTHLY	

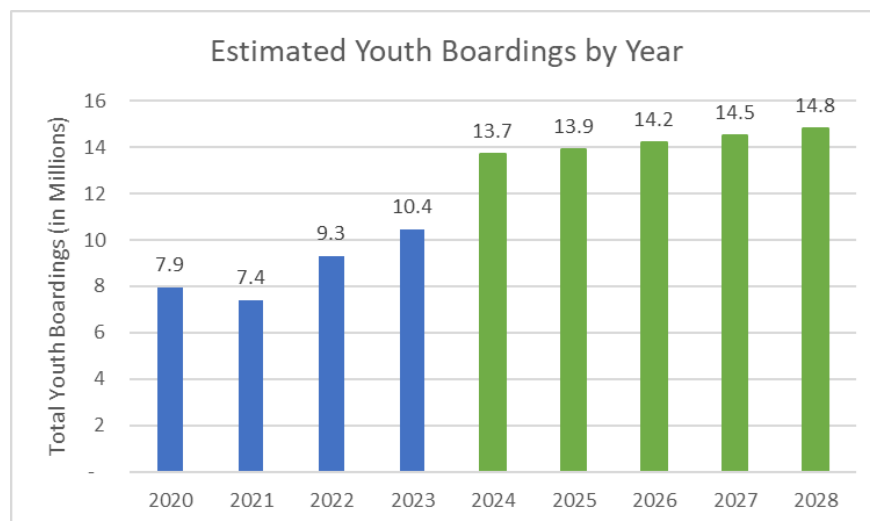
### Fare Structure without ZFY

YOUTH FARE	
3-HOUR	\$0.85
DAY	\$1.70
MONTHLY	\$27.00

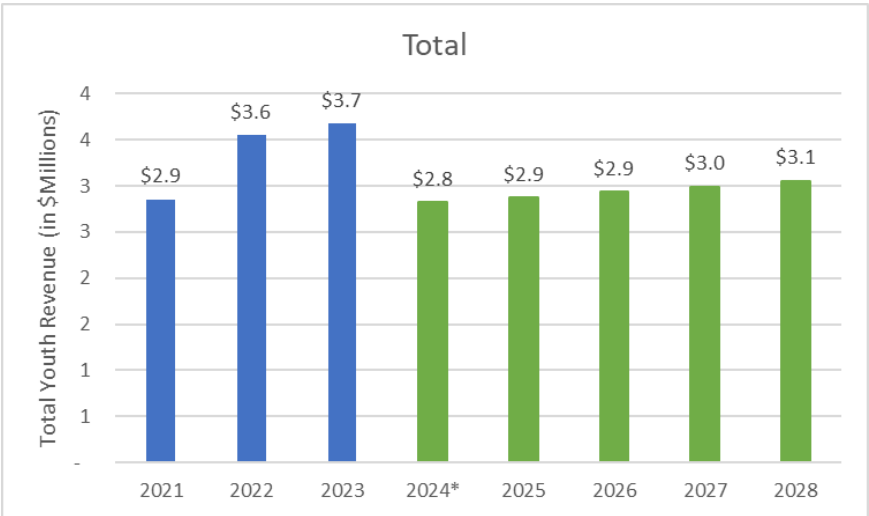
Incorporated into staff's recommendation, youth customers would be able to travel to any destination, including Denver International Airport, at no cost.

### 5. Projected Youth Ridership and Forgone Fare Revenue

With a ZFY program, youth boardings in 2025 are estimated to be 13.9 million. Estimated youth ridership for the subsequent years, should a ZFY program continue beyond 2025, is shown in the table below.



The forgone fare revenue in 2025 due to a ZFY program is estimated to be \$2.9 million. Estimated forgone fare revenue for the subsequent years is shown in the following table.



\*RTD fares decreased on January 1, 2024

SB032, which passed in May 2024 and was subsequently signed into law, specifically appropriates up to \$5 million to RTD in FY2024-25, provided that the agency applies for the grant. Should RTD apply and be approved for this grant, funds can be used to offset expenses associated with an increase in ridership, provide operating support for its transit operations and general transit programs, and to pay for other expenses necessary to implement and measure the effectiveness of the program. This includes but is not limited to reasonable marketing expenses and expenses incurred conducting customer surveys.

In addition to the forgone youth revenue estimated above, additional funds will be necessary to continue the ZFY program for marketing awareness and informational reminders across RTD’s transit network, language assistance and effective communications, a survey for youth customers or their guardians, and an annual report. RTD estimates these costs to total approximately \$410,000 from September 1, 2024 – August 31, 2025. Therefore, the \$5 million in available grant funding is expected to offset forgone revenue as well as additional expenses continuation of a ZFY program from September 1, 2024 through August 31, 2025.

6. Implementation

In order to be eligible for state grant funding, RTD will need to apply to the Colorado Energy Office. Details on the grant program are not yet available, but RTD is working closely with the Colorado Energy Office to understand the grant terms and process for receiving funding.

**FINANCIAL IMPACT**

As noted in the Discussion section of this report, the recommendation would result in forgone fare revenue of approximately \$2,900,000 as well as estimated costs of \$410,000, for a total financial impact of \$3,310,000. The financial impact would be fully offset by the grant established by SB032, should RTD apply for and be awarded the grant. The adoption of the Title VI Service Equity Analysis will not result in any direct or foreseeable financial impacts.

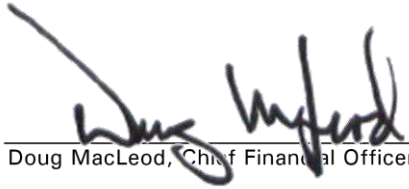
**ATTACHMENTS:**

- 2024.07.02 - ZFY Title VI Fare Equity Analysis (PDF)
- ZFY Program Continuation and Title VI Fare Equity Analysis Recommended Action\_July 23 2024 (PPTX)

<b>RESULT:</b>	<b>PASSED BY CONSENT VOTE [UNANIMOUS]</b>
<b>MOVER:</b>	Doug Tisdale, Director, District H
<b>SECONDER:</b>	Troy Whitmore, Director, District K
<b>AYES:</b>	Bouquet, Broom, Buzek, Catlin, Davidson, Dishell, Guissinger, Guzman, Harwick, Lewis, Rosenthal, Ruscha, Sloan, Tisdale, Whitmore

Prepared by:  
Doug MacLeod, Chief Financial Officer

Approved by:



Doug MacLeod, Chief Financial Officer

7/11/2024

Authorized by:



Debra A. Johnson, General Manager and CEO

7/19/2024



# Zero Fare for Youth Program Title VI Fare Equity Analysis

July 2, 2024

Prepared by Four Nines Technologies



and

Carl Green Jr. RTD Director of Civil Rights

# Table of Contents

1 Introduction.....	4
2 Overview of Proposed Fare Change .....	4
3 Title VI Policies.....	5
3.1 Disparate Impact and Disproportionate Burden Policies.....	6
3.1.1 Fare Changes .....	6
3.1.2 Adverse Effects .....	7
4 Fare Equity Analysis Methodology .....	7
4.1 Average Fare Analysis.....	8
4.1.1 Demographic Data.....	9
4.1.2 Demographic Assumptions.....	9
4.1.3 Additional Average Fare Analysis Assumptions.....	10
5 System Ridership Demographics Overview.....	12
5.1 Ethnicity Assumptions .....	12
5.2 Income Assumptions .....	12
5.3 Ridership Demographics.....	13
6 Fare Change Proposal.....	15
6.1 Overview of Proposed Fare Changes.....	15
6.2 Pricing, Payment and Media Changes .....	15
7 Fare Proposal Outreach.....	16
7.1 Fare Study Public Outreach Overview .....	16
Demographic Data.....	18
Demographic Data At-a-Glance.....	18
7.2 Zero Fare for Youth Public Outreach Overview.....	19
7.3 Summary of Public Comments .....	24
7.4 Changes to Proposal .....	24
7.5 Board Adopted Fare Change .....	24
8 Average Fare Analysis Findings.....	25
8.1 Average Fare Analysis Results .....	25
8.1.1 Key Findings.....	27
8.1.2 Overview of Overall Findings.....	27
9 Cumulative Findings and Mitigations .....	28



10 Next Steps.....	28
Appendix A: Zero Fare for Youth Survey Analysis Report .....	29
Appendix B: Detailed Average Fare Analysis Tables.....	30

# 1 Introduction

Title VI of the Civil Rights Act of 1964 (“Title VI”) ensures that “no person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” The Regional Transportation District (“RTD” or “The District”) has committed to the Federal Transit Administration (FTA) Title VI objectives set forth in Circular 4702.1B, ensuring that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color or national origin.

On June 2, 2023, RTD formally requested authorization to proceed with a 12-month Zero Fare for Youth pilot, as well as a time extension for completing a fare equity analysis of a potential permanent Zero Fare for Youth change since the pilot extends beyond the normal six-month period allowed under Federal Transit Administration (FTA) rules. The FTA approved RTD's Title VI Fare Equity Analysis extension request on June 22, 2023, in order to ensure all critical tasks associated with the Zero Fare for Youth pilot program were completed. This analysis of the Zero Fare for Youth program was prepared in conformity with the guidelines laid out in Chapter IV and Appendix K of FTA Circular 4702.1B, Service and Fare Equity Analysis Questionnaire Checklist.

The Fare Equity Analysis described herein assesses whether the proposed fare changes for fixed-route services would result in either Disparate Impacts on minority customers or a Disproportionate Burden on low-income customers. The proposed fare changes being presented by RTD are the basis of this Fare Equity Analysis. The analysis does not consider fare changes to Access-a-Ride services, which provide complementary paratransit services within the RTD service area, as they are not subject to the current Title VI evaluation requirements.

The Average Fare Analysis conducted as part of this Fare Equity Analysis found that the proposed fare change would not result in a Disparate Impact on minority customers or Disproportionate Burden on low-income customers. Given that there were no findings of Disparate Impact or Disproportionate Burden, no mitigations are needed to proceed with the implementation of the proposed fare change.

## 2 Overview of Proposed Fare Change

On July 25, 2023, the RTD Board of Directors approved a new fare structure, policies and programs that included the one year of no-cost transit for youth throughout the district. The fare changes<sup>1</sup> were developed as part of RTD's Systemwide Fare Study and Equity Analysis project, a yearlong review aimed at creating a fare structure that is more equitable, affordable and simple. Most of the fare changes were implemented in early 2024.

The Zero Fare for Youth pilot program was made available for youth customers September 2023 through August 2024. All youth ages 19 and younger, regardless of residency or school enrollment, are eligible for participation in the pilot. RTD is funding the financial impact resulting from implementation of a Zero Fare for Youth pilot program for the first year. For long-term sustainability, RTD sought out funding partners to support the continuation of the program after the pilot. RTD will be positioned to adopt this zero-fare offering if funding is secured.

In January 2024, Colorado lawmakers introduced Senate Bill (SB) 24-032 Methods to Increase the Use of Transit. SB-032, which passed in May 2024 and was subsequently signed into law, specifically appropriates up to \$5 million

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<sup>1</sup> <https://www.rtd-denver.com/community/news/rtd-board-of-directors-approves-new-fare-structure-and-equity-analysis>

to RTD in FY2024-25, provided that the agency applies for the grant. Should RTD apply and be approved for this grant, funds can be used to offset expenses associated with an increase in ridership, provide operating support for its transit operations and general transit programs, and to pay for other expenses necessary to implement and measure the effectiveness of the program.

On May 14, 2024, staff presented a discussion item to the Finance and Planning Committee regarding the draft results of the equity analysis for the ZFY program pursuant to Title VI of the Civil Rights Act of 1964 and the FTA Circular 4702.1B. The continuance of the ZFY program meets the definition of a fare change. Thus, an analysis is required to be brought before the Board for consideration and approval.

On June 11, 2024, staff presented a discussion item to the Finance and Planning Committee regarding the results of the 12-month pilot program from September 1, 2023 through August 31, 2024 with the intention of continuing the ZFY program for the following school year. The discussion item included information about increased youth boardings, estimated forgone youth revenue, and the potential for grant funding through SB 24-032.

Staff have now completed the community outreach and public comment for the proposed fare change and final Title VI fare equity analysis. Thereby, the proposed fare change to continue the ZFY program will be brought forward on July 23, 2024 for the Board's consideration and approval.

### 3 Title VI Policies

Title VI of the Civil Rights Act of 1964, Section 601 states:

*"No persons 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."*

It is RTD's objective to avoid, minimize or mitigate disproportionately high and adverse impacts on minority and low-income populations. As a recipient of financial assistance from the FTA, RTD is required to comply with Title VI of the Civil Rights Act of 1964 and its own Title VI Program adopted in accordance with same by evaluating major service and fare changes at the planning and programming stages to determine whether those changes have discriminatory impacts, including Disparate Impacts on minority populations and/or Disproportionate Burdens on low-income populations.

According to the Federal Department of Transportation, equity in the provision of transit service is "providing equal levels of service to minority and non-minority residents of the urbanized area. Levels of service, in turn, are defined in terms of capital allocation and accessibility."<sup>2</sup> The metrics of discrimination that could be monitored for disparate treatment include fare structures that could consistently cause minority-group customers to bear a higher fare burden than the overall riding public, access to specialized fare media, or methods of communication to populations with Limited English Proficiency. However, a Title VI Equity Analysis should not replace good program planning, which should be an on-going process that considers equity among other factors when designing fare changes, service changes, or discretionary policies and programs.

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<sup>2</sup> Transit Cooperative Research Program, Legal Research Digest: "The Impact of Civil Rights Litigation Under Title VI and Related Laws on Transit Decision Making", TCRP Project J-5, Washington, D.C. June 1997

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a Disparate Impact Policy and a Disproportionate Burden Policy for evaluating fare change proposals for equity and compliance with Title VI. As part of the 2022 Title VI Program Update, RTD maintained their 5% threshold for determining a Disparate Impact or Disproportionate Burden of a fare modification as established in RTD's Fare Disparate Impact Policy and Disproportionate Burden Policy. The Board of Directors adopted the Title VI Policies concurrent with the adoption of their 2022 Title VI Program Update. The policies used by RTD for analysis of proposed fare changes is found in Section 3.1.

## 3.1 Disparate Impact and Disproportionate Burden Policies

The FTA requires that transit agencies assess whether a proposed fare change or major service change would have a "Disparate Impact" on minority populations, or "Disproportionate Burden" on low-income populations, under Title VI of the Civil Rights Act of 1964, Title 49 C.F.R. Section 21.5(b)(2) and (b)(7), and Appendix C to Title 49 C.F.R. part 21. Pursuant to FTA Circular 4702.1B, FTA requires public transit agencies operating 50 or more fixed route vehicles in peak service and located in urbanized areas of 200,000 or more people, to clearly establish, with input through a public engagement process, threshold definitions for measuring Disparate Impacts and Disproportionate Burdens.

RTD's Fare Disparate Impact and Disproportionate Burden policies establish threshold standards for evaluating the equity impacts and the distribution of adverse effects caused by any fare change or major service change. These thresholds enable RTD to determine whether minority and low-income customers would be disproportionately impacted by the adverse effects of the proposed changes and by inference, whether the overall ridership would disproportionately benefit from the proposed changes when compared to the protected populations (minority and low-income). These thresholds are based on the cumulative impact of the proposed service or fare change.

The policies and their applicable analyses and 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, which 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**

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, which 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.

### 3.1.1 Fare Changes

RTD defines a fare change as an increase in the price of fare media, decrease in the price of fare media, creation of new fare media or the discontinuance of current fare media. Fare Media are defined as forms of payment for transit service (i.e., cash fare, paper pass, etc.).

Based on federal guidance, prior to adopting a fare change, RTD must conduct a fare equity analysis and analyze specific elements of the proposed structure and changes to fare media along with the recommended pricing schema, to determine whether the changes would result in impacts that exceed the threshold established by the policies. As referenced in C4702.1B, some fare changes are excluded from being the subject of a Fare Equity Analysis, such as instances where all passengers ride free such as “Spare the Air Days”, or temporary fare reductions that are mitigating measures for other activities such as construction, or promotional fare reductions, so long as the temporary fare reduction or promotional reduction does not last longer than six months.

### 3.1.2 Adverse Effects

For the fare equity analysis, adverse effects include an increase in cost or a reduction in accessibility of fare media. Benefits include a decrease in cost, increase in discounts for certain fare types or customer populations, or increase in accessibility of fare media. The results of analysis provided in this report uses RTD’s adopted thresholds for determining Disparate Impacts and Disproportionate Burdens.

## 4 Fare Equity Analysis Methodology

For proposed changes that would increase or decrease the fares on the entire system, or on certain transit modes, or by fare payment type or fare media, RTD shall analyze any available information generated from passenger surveys indicating whether minority and/or low-income customers are disproportionately more likely to use the mode of service, payment type or payment media that would be 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 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.<sup>3</sup> In accordance with RTD Title VI Policies, the determination of a Fare Disparate Impact or Disproportionate Burden is based on the difference in the impacts experienced by minority and low-income persons as a result of any fare price change or the average of multiple fare changes compared to the impacts experienced by the overall ridership.

Based on the Federal Guidance and the RTD 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 all users; and
- (iv) Compare the differences for each particular fare media between low-income users and all users.<sup>4</sup>

A fare equity analysis compares the current fare to the proposed fare and calculates the absolute change as well as the percent change. Utilizing the Disparate Impact and Disproportionate Burden threshold, a determination is made as to whether the fare change will result in adverse effects that are disproportionately borne by the minority

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<sup>3</sup> Federal Circular: C4702.1B Chap IV-10

<sup>4</sup> Federal Circular C4702.1B Chap. IV-19

or low-income populations, respectively. The thresholds are also used to assess whether the proposed changes disproportionately benefit the overall population, including non-minority or non-low-income populations.

Throughout the document, the following definitions are used:

- Fare payment type is defined as fare product (e.g., Day Pass, Monthly Pass) and fare media on which it is distributed (i.e., cash, paper, electronic)
- Fare levels include Local, Regional and Airport. Whether the Local or Regional fare level applies is based on the number of zones traveled on rail and distance traveled on bus. The Airport fare level applies to any trip to or from Denver International Airport, regardless of distance, on the A Line, SkyRide or Express bus.
- Fare-paying rider categories include full fare customers, seniors 65+, individuals with disabilities, Medicare recipients, LiVE customers and youth aged 19 and younger.

This report provides the results of the **Average Fare Analysis** undertaken to assess the effects of the proposed fare changes on the average fare paid per boarding to determine whether minority or low-income customers are disproportionately adversely impacted by the changes or whether overall customers disproportionately benefit from the changes.

## 4.1 Average Fare Analysis

The Average Fare Analysis for the proposed changes was undertaken using ticket sales and revenue data from calendar year 2021, when ridership was continuing to recover from the COVID pandemic. Ridership by fare payment type was estimated based on ticket sales and revenue data as well as transfer and fare product usage rates developed using the 2017 RTD Customer Satisfaction Survey (2017 CSS). The 2019 RTD Customer Satisfaction Survey (2019 CSS) was used for the customer demographic data. While the 2019 CSS sample size was smaller than the 2017 CSS, it provides demographic data on electronic fare adoption, which were not available in the 2017 CSS.

The Average Fare Analysis excludes free rides as ridership data for free rides are not available. Free rides include Access-a-Ride customers on fixed-route and FlexRide services, children ages 5 and younger traveling with a fare-paying adult, active duty members of the U.S. military and other customers on the RTD fare exemption list. The Average Fare Analysis also excludes free rides taken on the MallRide. Further, this Fare Equity Analysis does not consider the impacts of the proposed changes to Access-A-Ride fares on the average fare paid as paratransit services are not subject to the current Title VI evaluation requirements.

The only ridership 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. Fare elasticity is a measure of rider sensitivity to changes in fare rates and the resulting change in ridership behavior. Elasticity assumptions are essential to modeling anticipated ridership and fare revenue impacts from fare policy changes, but are often excluded from fare equity analyses. Fare equity analyses seek to understand the average fare experienced by a segment of customers prior to a fare change and after a fare change, in order to determine the % change in average fare. This calculation becomes unnecessarily complex when a customer segment is anticipated to attract new customers to the system or from other fare products. Therefore, fare elasticity is excluded in order to compare the average fare impacts of the fare changes on the same segment of customers after the change in pricing and policies.

### 4.1.1 Demographic Data

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 CSS was considered for use in the analysis instead of the 2019 CSS, given the much larger sample of completed surveys (9,936). However, the survey included limited customer response data on electronic fare adoption due to the timing of when the survey was conducted (May 2017) and when electronic fares launched – MyRide Stored Value (May 2017) and RTD Mobile Tickets App (November 2017).

While the demographics of transit ridership may have changed due to COVID, the 2019 CSS provides the most comprehensive and recent survey data available of systemwide demographics, and likely provides a conservative assessment of the impacts of the proposed fare changes on minority and low income customers.

### 4.1.2 Demographic Assumptions

The 2019 CSS, while comprehensive with a significant number of survey responses, does have some limitations. Low response rates for some rider categories, fare levels and fare payment types, as well as the absence of some fare payment options on the survey pose several challenges. The Average Fare Analysis attempts to address the limitations of the data by using demographics for similar rider categories or aggregating responses for different fare payment types for a specific rider category.

The following demographic assumptions are used in the Average Fare Analysis:

- Demographics for youth are assumed to align with the demographics of Local full fare customers. The methodology of the 2019 CSS specifically avoids targeting youth customers under the age of 18, so this customer group is underrepresented in the 2019 CSS, representing less than 2% of customers in the survey. Due to insufficient survey responses, we consider youth demographics to be similar to those of their family. Additionally, because 93% of youth boardings are assumed to occur on Local services, youth demographics are assumed to mirror Local full fare customer demographics.
- Demographics for full fare customers who are not eligible for a discounted fare or for a pass program are assumed to vary by fare level (Local, Regional, Airport) and by fare payment type, including whether fares are paid with electronic fare media (i.e., MyRide Stored Value or Mobile Ticket) for 3-Hour and Day Pass customers.
- Demographics for seniors, individuals with disabilities and Medicare recipients are assumed to vary by fare level and fare payment type. No distinction in demographics by fare media type is assumed due to insufficient survey responses. For Airport fares, demographics are aggregated for all fare payment types due to limited survey responses.
- Demographics for LiVE customers are assumed not to vary by fare level or fare payment type. The 2020 LiVE Program Survey did not ask respondents about the fare level they typically paid. Responses were aggregated for all fare payment types as the differences between the fare payment types was minimal.
- Demographics for expanded LiVE customers are assumed to align with full fare customers with a household income between 185% and 250% of the federal poverty level who would become eligible for the LiVE Program. Demographics are assumed to vary by fare level. Demographics are not assumed to vary by fare payment type due to insufficient survey responses.



- Demographics for bulk sales are assumed to align with the demographics for all rider categories and fare payment types for a given fare level.
- Demographics for pass program customers are assumed to vary by pass program (Business EcoPass, Neighborhood EcoPass or CollegePass) and fare level (Local, Regional, Airport).
- Demographics for Semester Pass are assumed to align with the demographics for CollegePass customers.

Due to insufficient data to support other assumptions, the Average Fare Analysis assumes that overall customers, minority customers and low-income customers have identical usage rates and transfer rates for a given fare payment type. This means that for any given fare payment type, it is assumed that overall, minority and low-income customers will all have the same average fare. To be clear: the analysis only assumes that the average fare is identical for overall, minority and low-income customers within a given fare payment type; average fares are assumed to differ across fare payment types (e.g., 3-Hour Pass, Day Pass), rider categories (e.g., full fare, LIVE customers) and fare levels (i.e., Local, Regional, Airport).

#### 4.1.3 Additional Average Fare Analysis Assumptions

Assumptions were made regarding the impact of the Zero Fare for Youth program on the EcoPass programs; namely, the Neighborhood EcoPass and CollegePass program customers. The EcoPass programs are universal pass programs, where all (or the vast majority) of a business, neighborhood or college are required to participate. By having a large group of participants with varying levels of utilization of the system under a single contract, RTD can continue to charge the contracted entity only for those trips that are taken. But when that cost is spread across a large group of customers, it results in a relatively affordable rate per customer. In all three cases, the utilization of the system multiplied by a fare rate is the fundamental determinant of contract pricing, although the specific calculation steps differ slightly for each Pass Program.

With the introduction of the Zero Fare for Youth policy, the utilization of younger customers eligible for the Zero Fare for Youth program is expected to be excluded from the Pass Program pricing calculation, thereby resulting in a lower contract amount. For a number of the Neighborhood EcoPass contracts and nearly all CollegePass contracts, this is expected to result in a notable decrease in future contract pricing. For business EcoPass, some small contract pricing impacts may be felt however past survey data has suggested that the share of participating employees that are 19 years of age or younger is a relatively small share.

However, the benefits of the lower contract pricing cannot be easily attributed to any given individual because pass program participants do not pay on a per-boarding basis, and may not pay for their EcoPass at all. For example, with the CollegePass program, if 30% of a college community was eligible for the Zero Fare for Youth program, any assessment of equity impacts would need to know whether the College planned to reduce the per student CollegePass fee by 30% for all participating students (regardless of age) or planned to allow students 19 years of age and under to opt out of the fee, with the remaining students covering the remainder of the contract amount (which may increase their CollegePass price). Depending on the decision, these can have markedly different financial outcomes on individual participants, and these decisions fall to the participating colleges, not to RTD. In the case of business EcoPass, a number of employers fully subsidize the cost of EcoPass and employees do not pay anything for their use of the transit system; in these cases, any change in EcoPass pricing related to the introduction of the Zero Fare for Youth program would not have any impact on the per-boarding cost to employees, it would only impact the overall cost to the employer. Further, with little detail on specific demographics by contract and by age group, assessing per customer demographic impacts is not possible.

For this reason, the average fare analysis assumes that there are no changes in the average fare for the business EcoPass, Neighborhood EcoPass or CollegePass programs. It is likely that at least some participants in these programs will benefit from lower contract pricing with the introduction of the Zero Fare for Youth program over time however, given that participants in these programs do not pay on a per-boarding basis, that the distribution of benefits can vary widely across Pass Program participants, and that the demographic makeup of individual Pass Program contracts is not known, the analysis cannot fairly assess potential changes in the average fare.

## 5 System Ridership Demographics Overview

The following provides an overview of RTD’s systemwide ridership using data from the 2019 CSS, which is the most recent onboard survey with the detailed information needed for the Fare Equity Analysis. While other data sources have been consulted for the Fare Equity Analysis, the 2019 CSS provides the most accurate data for portraying systemwide ridership demographics.

These demographic statistics were considered in the development of the proposed fare changes in order to minimize or avoid the potential for changes that would result in Disparate Impacts on minority customers or a Disproportionate Burden on low-income customers.

### 5.1 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 respondents who refused to respond to the racial/ethnicity question. Additionally, respondents who did not choose an ethnicity or race yet submitted a survey response that did not comport with racial/ethnicity designations (e.g., “Human,” “Female Only,” “Russian”) were assumed to be non-minority. The racial/ethnicity categories in the survey include:

1. African-American/Black
2. Asian/Pacific Islander
3. Caucasian/White - not of Hispanic origin
4. Hispanic/Latino
5. Native American/Indian
6. Other (please specify)

### 5.2 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 (also referred to as federal poverty level). To align with the 2019 CSS, the 2019 HHS Poverty Guidelines were used to determine which populations would be considered low-income.

Table 1 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 2 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% U.S. 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 1: 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 2: 2019 Customer Satisfaction Survey Household 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	

## 5.3 Ridership Demographics

Figures 1 and 2 provide an overview of systemwide fixed-route ridership by minority and income status for those who responded to ethnicity and income related questions, excluding those who refused to respond to ethnicity or income questions. For purposes of the analysis, minority status is characterized as anyone who responded to anything other than only “Caucasian/White.” Low-income status was determined through a cross tabulation of household income and size, matching the income to 150% of the U.S. HHS Poverty Guidelines, as discussed above. It should be noted that for purposes of this Fare Equity Analysis, low-income customers are defined as those at or below 150% of the federal poverty level. This is different from the current RTD definition for income eligibility for the income-based LiVE Program, which is set at or below 185% of the federal poverty level for adults ages 20-64.

Figure 1: Ridership Ethnicity

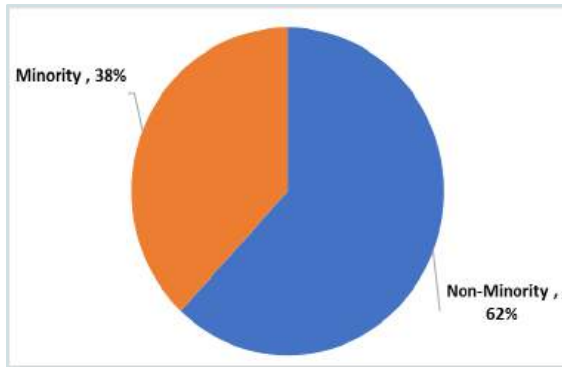
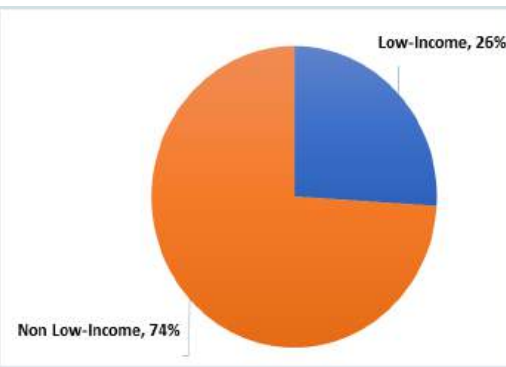


Figure 2: Ridership Income



To support the Fare Equity Analysis, cross-tabulations of the 2019 CSS were performed for those who responded to ethnicity- and income-related questions to develop a breakdown of demographics by fare payment type. Because the 2019 CSS was conducted prior to the launch of the LiVE Program, data from the 2020 LiVE Program Survey and the Average Fare Analysis were used to modify the fare payment profiles to account for the LiVE Program. Recognizing that various fare changes may impact some protected groups more than others, the relationship between fare payment type and ethnicity and income was reviewed. Table 3 presents the fare payment type by minority and income status.

Table 3: Fare Payment Type by Minority and Income Status

Total RTD System Fare Payment Profile			
Fare Type	Overall Customers	Minority Customers	Low-Income Customers
Full Fare, 3-Hour Pass	15.6%	15.5%	20.7%
Full Fare, 10-Ride	5.8%	7.0%	5.9%
Full Fare, Day Pass	9.7%	11.6%	9.9%
Full Fare, Monthly Pass	13.3%	14.7%	10.8%
LiVE, 3-Hour Pass	0.3%	0.4%	0.7%
LiVE, 10-Ride	<0.1%	<0.1%	<0.1%
LiVE, Day Pass	0.4%	0.6%	1.1%
Youth, 3-Hour Pass	0.9%	1.3%	1.8%
Youth, 10-Ride	0.4%	0.9%	0.4%
Youth, Day Pass	0.1%	0.0%	0.0%
Youth, Monthly Pass	0.4%	1.1%	1.6%
Senior/Disabled, 3-Hour Pass	6.4%	5.3%	8.3%
Senior/Disabled, 10-Ride	2.5%	2.4%	3.7%
Senior/Disabled, Day Pass	2.8%	2.7%	4.0%
Senior/Disabled, Monthly Pass	3.3%	3.4%	6.2%
EcoPass (Business)	27.3%	22.1%	7.1%
EcoPass (NECO)	3.0%	1.3%	2.4%
CollegePass	7.7%	9.8%	15.3%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

Percentages may not sum to 100% due to rounding

Percentages for youth are underrepresented as survey staff are instructed to not to survey individuals under 18 years of age.

Sources: 2019 CSS, 2020 LiVE Program Survey

## 6 Fare Change Proposal

As part of RTD's Systemwide Fare Study and Equity Analysis project, the public expressed strong support for a zero fare for youth pilot. Based on this feedback, staff determined it would be beneficial for the pilot to align with the 2023-24 school year. The proposed fare change is summarized below.

### 6.1 Overview of Proposed Fare Changes

RTD launched a Zero Fare for Youth pilot program for a period of up to 12-months beginning September 1, 2023 and lasting through August 31, 2024. All youth ages 19 and younger, regardless of residency, are eligible for participation in the pilot. Proof of eligibility that would be required to ride free is to be determined. The pilot would likely be supported by internal RTD funds with potentially some additional support from external funding partners. A permanent Zero Fare for Youth program would be contingent upon the availability of sustainable, external funding. At the conclusion of the pilot, if it was not made permanent, youth fares would revert to a 70% discount on the full fare 3-Hour, Day and Monthly Passes, as noted in Section 6.1.2.

Because the Zero Fare for Youth pilot program is intended as a pilot, this Fare Equity Analysis and Average Fare Analysis assumes that the fare pricing for youth ages 19 and younger would remain at a 70% discount of the full fare before and after the pilot. For details on specific pricing assumed in the Fare Equity Analysis, see Table 4 in Section 6.2.

### 6.2 Pricing, Payment and Media Changes

**Table 8: Proposed Changes to Fare Pricing**

Current Fare Payment Type	Current Price	Proposed Price
Youth		
Standard		
3-Hour Pass	\$0.85	\$0.00
Paper 10-Ride Ticket Book	\$8.50	
Day Pass (service day)	\$1.70	
Monthly Pass (calendar)	\$27.00	
Airport		
3-Hour Pass	\$0.85	\$0.00
Day Pass (service day)	\$1.70	
Monthly Pass (calendar)	\$27.00	
Access-A-Ride*		
Ticket (one-way, no airport)	\$4.50	\$0.00
Ticket (one-way, includes airport)	\$19.00	
Paper 6-Ride Ticket Book	\$27.00	

\*Youth must be medically certified to use this service

Throughout the Zero Fare for Youth pilot program, eligible customers 19 and younger only need to show proof of eligibility to the bus operator and fare inspectors to ride RTD buses and trains. The proof includes the following:

- Middle or high school student identification card
- Passport
- Valid government-issued identification card or driver's license
- Alien registration/permanent resident card
- Military identification/dependent card with date of birth
- RTD-issued Youth Special Discount Card

## 7 Fare Proposal Outreach

The following is a summary of themes across the feedback received.

### 7.1 Fare Study Public Outreach Overview

In the fourth and final phase of public engagement, customers and community members had the opportunity to provide feedback on the recommended changes to the fare structure, policies and programs through public comment. The public comment period was open from April 13 to May 24, 2023.

Public comment could be submitted in several formats, including:

- Online on the Fare Feedback website, which provided a comprehensive overview of the proposed fare changes
- Written on a paper comment form at Fare Study open houses, station pop-ups and community events
- Spoken out loud at one of four virtual public hearings

The public comment form asked for open-ended feedback on three topics: the recommended fare structure, recommended policies and programs and fare equity (Title VI Analysis). Participants could optionally include their name, organization with which they were affiliated, and demographic information (including racial and ethnic background, income, household size and age). A list of organizations represented and a summary of demographic information of the commenters are included in this summary.

Table 5 provides a summary of the outreach events and methods along with the estimated number of participants. Engagement opportunities and methods of promotion included:

- Virtual Public Hearings in English and Spanish
- In Person Open Houses with Spanish and American Sign Language Interpretation
- Community Events and Pop-Ups
- Community Partner Outreach
- Community Based Organization Outreach
- Digital Promotion
- Earned Media
- Informational Handouts Translated Into 23 Languages

The following sections include an overview of the public comment promotion, key themes that emerged from the comments and feedback received.



**Table 5: Outreach events, methods and attendees**

<b>Date and Time</b>	<b>Event</b>	<b>Address</b>	<b>Public Participation (Attendees)</b>
<b>4/6/2023</b>	Colorado Rockies Home Opener	1900 Wazee Street, Denver	491
<b>4/19/2023</b>	The Road Ahead (hosted by Transportation Solutions)	2055 E Evans Avenue, Denver	100
<b>4/20/2023</b>	Transportation Management Association Outreach Meeting (hosted by DRCOG)	Virtual	21
<b>4/25/2023</b>	RTD Fare Study Pop-Up Event	Lincoln Station, 10203 Station Way, Lone Tree	9
<b>4/26/2023</b>	RTD Fare Study Pop-Up Event	Arapahoe at Village Center Station, 8800 E. Caley Way, Greenwood Village	39
<b>4/29/2023</b>	Adams 12 Five Star School District Wellness Festival	Riverdale Regional Park, 9755 Henderson Rd, Brighton	169
<b>4/29/2023</b>	Respect the Ride Community Event	Union Station, 1701 Wynkoop Street, Denver	65
<b>5/2/2023</b>	Public Hearing – Spanish	Virtual	16
<b>5/2/2023</b>	Denver Mobility Access Coalition Meeting	Virtual	16
<b>5/2/2023</b>	RTD Fare Study Pop-Up Event	Central Park Station, 8200 Smith Road, Denver	60
<b>5/3/2023</b>	Public Hearing – English	Virtual	16
<b>5/3/2023</b>	RTD Fare Study Pop-Up Event	US 36 and Sheridan Station, 5025 W 88 <sup>th</sup> Pl., Westminster	50
<b>5/4/2023</b>	RTD Fare Study Pop-Up Event	Union Station, 1701 Wynkoop Street, Denver	80
<b>5/6/2023</b>	Cinco de Mayo Festival	Civic Center Park, 101 14 <sup>th</sup> Ave, Denver	340
<b>5/8/2023</b>	Civic Academy	1001 17 <sup>th</sup> St, Denver	159
<b>5/9/2023</b>	RTD Fare Study Pop-Up Event	Littleton/Downtown Station, 5777 S. Prince Street, Littleton	13
<b>5/11/2023</b>	RTD Fare Study Pop-Up Event	Wagon Road Park-n-Ride, 600 W. 120 <sup>th</sup> Ave, Westminster	21
<b>5/11/2023</b>	RTD Fare Study – Open House	LoDo Towers, 1401 17 <sup>th</sup> St., Denver	17
<b>5/12/2023</b>	Jeffco Older Adult Wellness Fair	1555 Dover St., Lakewood	65

<b>5/14/2023</b>	Viva Streets Denver	Broadway at Bayaud Ave, Denver	150
<b>5/16/2023</b>	Storytime and FlexRides at the Library	3 Community Park Road, Broomfield	159
<b>5/16/2023</b>	Public Hearing – Spanish	Virtual	12
<b>5/16/2023</b>	Public Hearing – English	Virtual	19
<b>5/16/2023</b>	Civic Academy	1001 17 <sup>th</sup> St, Denver	30
<b>5/17/2023</b>	RTD Fare Study – Open House	Carla Madison Rec Center, 2401 E Colfax Ave, Denver	24
<b>5/20/2023</b>	Northglenn Food Truck Carnival	Community Center Drive, Northglenn	66
<b>5/20/2023</b>	Adams County Connect Summer Kick-Off	Rotella Park, 1824 Coronado Parkway N, Denver	103
<b>5/20/2023</b>	Sun Valley Night Market	Empower Field at Mile High, Denver	113
<b>5/23/2023</b>	RTD Fare Study Pop-Up Event	Olde Town Arvada Station, 5575 Vance Street, Arvada	14
<b>5/24/2023</b>	Credit Union Smart Commute Fair	360 Interlocken Boulevard, Broomfield	7
<b>5/24/2023</b>	RTD Fare Study Pop-Up Event	Federal Center Station, 11601 W. 2 <sup>nd</sup> Place, Lakewood	16
<b>5/24/2023</b>	Boulder County Farmers Market	13 <sup>th</sup> Street, Boulder	73

## Demographic Data

When providing a public comment, community members were given the opportunity to provide demographic information, although doing so was optional and clearly denoted as such. Of the 731 comments submitted, 509 commenters provided demographic information. Data gathered included racial/ethnic background, age, annual household income and number of household residents. Several key demographic statistics about the commenters are outlined below.

### Demographic Data At-a-Glance

- 55% identify as Black, Indigenous or a Person of Color (not white/Caucasian)
- 41% identify as Hispanic/Latine
- 20% would qualify for age-based discounts
- 32% have an annual household income of less than \$10,000
- 50% have an annual household income of less than \$30,000
- 69% have an annual household income of less than \$70,000
- 50% live with 3 or more household members
- 25% of comments were submitted in Spanish

## 7.2 Zero Fare for Youth Public Outreach Overview

A kickoff media event occurred on August 8, 2023, at the Chestnut Pavilion Denver Union Station with the following speakers: Debra A. Johnson General Manager and CEO of RTD, Denver Councilwoman Amanda Sawyer, District 5, Denver Public Schools Board Member Scott Baldermann, District 1, RTD Board Chair Lynn Guissinger, District O, RTD Board Director Kate Williams, District A.

Staff convened virtual informational meetings with public school districts on August 21, 2023 and August 24, 2023. These meetings were held with staff representatives from Adams 12, Adams 14, Adams County, Aurora, Boulder Valley, Brighton, Cherry Creek, Denver, Douglas County, Englewood, Jeffco, Littleton, Mapleton, St. Vrain Valley, Westminster. The meetings served as an opportunity to provide an overview of the pilot program, seek administrative support for program evaluation, respond to questions and garner feedback.

RTD implemented a comprehensive marketing and outreach strategy that featured distinctive creative assets to inform and engage both existing customers and the wider public about the Zero Fare for Youth pilot program. The multi-faceted approach combined digital and social media, a dedicated webpage<sup>5</sup>, in-system assets, public relations efforts, community engagement, partnerships, and paid media, to effectively communicate the benefits of public transit while encouraging a positive shift in riding habits in the short and long term. To garner direct feedback from youth and families, RTD administered surveys, virtually and in-person, between October 16, 2023 and March 15, 2024. The survey consisted of questions about youth and/or family travel behaviors and experiences using RTD services, thoughts on the Zero Fare for Youth pilot program and general information. The online survey was available in English and Spanish and offered the chance to win a \$25 King Soopers gift card for up to 20 participants. **Appendix A** provides the full Zero Fare for Youth Survey Analysis Report.

Staff phoned and emailed 105 private schools, 124 youth-serving organizations, 39 recreation centers and 40 libraries to promote the pilot program, distribute English and Spanish toolkits and disseminate surveys to families who may be using RTD services during the Zero Fare for Youth pilot program. Outreach to these entities were carried out in two phases. The first occurred between October-November 2023 and second occurred between January-June 2024.

Table 6 provides a summary of the outreach events and methods along with the estimated number of participants. Engagement opportunities and methods of promotion included:

- In-Person and Virtual Public Hearings in English and Spanish
- Community Events and Pop-Ups
- Community Based Organization Outreach
- Partner toolkit was created that included FAQ's, news release, rack card, social graphics, and tabletop sign
- Digital Promotion
- Earned Media

The following sections include an overview of the public comment promotion, key themes that emerged from the comments and feedback received.

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<sup>5</sup> <https://www.rtd-denver.com/zero-fare-for-youth>

**Table 6: Outreach events, methods and attendees**

<b>Date and Time</b>	<b>Event</b>	<b>Address</b>	<b>Public Participation (Attendees)</b>
<b>6/03/2023</b>	Touch-a-Truck	1900 Harlan St, Denver	70
<b>6/10/2023</b>	Thriving CommUNITY Fair	900 Via Appia Way, Louisville	200
<b>6/10/2023</b>	Annual Filipino Festival	1900 Harlan St, Denver	70
<b>6/20/2023</b>	World Refugee Day Celebration	1255 Yosemite Street, Denver	29
<b>6/24/2023</b>	Heal the Hood	5200 Crown Blvd., Denver	225
<b>07/10/2023</b>	Boulder Mobility Access Coalition Meeting	Virtual	27
<b>07/20/2023</b>	Northglenn State of the City	1 E. Memorial Parkway, Northglenn	107
<b>07/25/2023</b>	Transit Day	Olde Town Arvada Station	14
<b>07/25/2023</b>	Transit Day	Downtown Boulder Station	36
<b>07/26/2023</b>	Transit Day	Federal Center Station	10
<b>08/03/2023</b>	Viva! Streets	Civic Center Park, Denver	339
<b>08/09/2023</b>	Community Active Living Coalition Meeting	Virtual	8
<b>8/5/2023</b>	Brick City – Mestizo Park	900 32nd Street, Denver	150
<b>08/09/2023</b>	Zero Fare for Youth Press Event	Union Station	25
<b>08/12/2023</b>	Second Saturday Festival	Olde Town Arvada Station	286
<b>8/12/2023</b>	Lincoln College Tech	11194 E. 45 <sup>th</sup> Ave., Denver	425
<b>08/16/2023</b>	Hearts and Gears	1400 Maple Street, Golden	374
<b>08/16/2023</b>	Customer Appreciation Event	US36 and Sheridan Station, Westminster	30
<b>08/19/2023</b>	Global Fest	15151 E. Alameda Parkway, Aurora	587
<b>08/24/2023</b>	Back to School Night – Adams City High School	7200 Quebec Parkway, Commerce City	27
<b>08/27/2023</b>	Zero Fare Celebration	Decatur-Federal Station	67
<b>08/29/2023</b>	CommUNITY Power Hour Meeting	Virtual	37

<b>08/31/2023</b>	Innov8x Course	1400 Maple Street, Golden	4
<b>09/01/2023</b>	How to Ride – Lester Arnold High School	7133 E. 73 <sup>rd</sup> Avenue, Commerce City	17
<b>09/14/2023</b>	Zero Fare Presentation for Colorado Association for Transit Agencies	Crested Butte, CO	28
<b>9/16/2023</b>	Taste of Hidden Brook Community Event and Resource Fair	1370 Xenia St, Denver	100
<b>09/19/2023</b>	How to Ride – Niwot High School	8989 Niwot Road, Niwot	18
<b>09/20/2023</b>	Boulder Transportation Connections Meeting	2440 Pearl Street, Boulder	30
<b>9/23/2023</b>	Civil Rights Mixtape	The People’s Building, 9995 E Colfax Ave, Aurora	75
<b>09/23/2023</b>	Hometown Fest	5401 W. 22 <sup>nd</sup> Avenue, Edgewater	37
<b>09/30/2023</b>	Safety Fair	6651 Indiana Street, Arvada	333
<b>10/03/2023</b>	Denver Regional Mobility and Access Council Meeting	Virtual	26
<b>10/04/2023</b>	Customer Appreciation Event	US36 and McCaslin Station, Louisville	61
<b>10/05/2023</b>	Student Resource Fair – Emily Griffith High School	1860 Lincoln Street, Denver	32
<b>10/11/2023</b>	Westwood Community Celebration/Una Mano Una Esperanza	1000 Lowell Blvd., Denver	425
<b>10/14/2023</b>	Touch-a-Bus	4100 S Himalaya Street Aurora	873
<b>10/18/2023</b>	JeffCo 10 <sup>th</sup> Grade Career Expo	150 S, Harlan Street, Lakewood	176
<b>10/24/2023</b>	How to Ride Presentation	3200 S. Delaware Street, Englewood	7
<b>10/25/2023</b>	RTD at the Anythink Library	7815 Monaco Street, Commerce City	6
<b>10/25/2023</b>	Boonion Station	1700 Wynkoop Street, Denver	1112
<b>10/26/2023</b>	Zero Fare Presentation – CDOT Transportation Demand Management Summit	900 Auraria Parkway, Denver	22
<b>11/03/2023</b>	How to Ride – Longmont High School	1040 Sunset Street, Longmont	15
<b>11/08/2023</b>	How to Ride – Main Street High School	820 Main Street, Longmont	17
<b>11/08/2023</b>	How to Ride – Skyline High School	600 E. Mountain View Avenue, Longmont	10

<b>11/14/2023</b>	Student Resource Fair – Red Rocks Community College	10280 W. 55 <sup>th</sup> Avenue, Arvada	16
<b>11/15/2023</b>	How to Ride – Silver Creek High School	4901 Nelson Road, Longmont	19
<b>11/20/2023</b>	Refugee First Thanksgiving	Assumption of the Theotokos, 4610 E Alameda Ave, Denver	400
<b>12/05/2023</b>	Innov8x Course	1400 Maple Street, Golden	30
<b>12/7/2023</b>	St. Francis De Sales Parish	300 South Sherman St, Denver	120
<b>12/20/2023</b>	Christmas in the Community	1000 Lowell Blvd., Denver	425
<b>1/19/2024</b>	Adams 12 Meet-and-Greet	Eastlake and 124 <sup>th</sup> Station	30
<b>1/24/2024</b>	Aurora Central High School	11700 E. 11 <sup>th</sup> Ave., Aurora	65
<b>1/27/2024</b>	RTD at George Reynolds Library	3595 Table Mesa Drive, Boulder	65
<b>2/5/2024</b>	Senate Bill 24-032 – Methods to Increase the Use of Transit Hearing	Colorado General Assembly 200 E Colfax Avenue, SCR 350, Denver	50
<b>02/13/2024</b>	How to Ride with Iowa Elementary School	16701 E. Iowa Avenue, Aurora	15
<b>2/23/2024</b>	Hinkley High School Career Fair	1250 Chambers Road, Aurora	250
<b>3/1/2024</b>	Aurora West College Preparatory Academy Career Fair	10100 E 13th Avenue, Aurora	250
<b>3/2/2024</b>	Empowering Communities Globally Travel Training with DRMAC	University of Colorado at Denver	67
<b>3/7/2024</b>	Servicios de la Raza Migrant Assistance Resource Fair	Servicios de la Raza, 3131 W 14 <sup>th</sup> Ave, Denver	150
<b>3/13/2024</b>	Hope Communities Bi-weekly Community Navigator Meeting	Hidden Brook Apartments, 1313 Xenia St, Denver	10
<b>3/20/2024</b>	Morgridge Academy	1400 Jackson Street, Denver	38
<b>4/05/2024</b>	Rockies Home Opener	1800 Wynkoop Street, Denver	821
<b>4/06/2024</b>	Spring Institute Soccer Ride-Along	8806 E. 13 <sup>th</sup> Avenue, Denver	21
<b>4/16/2024</b>	Newcomer Resource Fair	9471 Dorothy Boulevard, Thornton	97
<b>4/23/2024</b>	RTD at the Boulder Library	1001 Arapahoe Avenue, Boulder	68
<b>4/25/24</b>	Montbello Organizing Committee Summit	4411 Peoria Street, Denver	125

<b>4/26/2024</b>	Career Day at Valverde Elementary School	2030 W. Alameda Avenue, Denver	42
<b>5/01/2024</b>	Reading and Recreation Event	McElwain Elementary School 1020 Dawson Drive, Denver	163
<b>5/03/2024</b>	Cafe con el Director ft. RTD	Bryant-Webster Dual Language School	20
<b>5/03/2024</b>	Where Did We Sit on the Bus?	1050 13 <sup>th</sup> St, Denver	200
<b>5/06/2024</b>	Transportation and Land Use Presentation	400 Airport Blvd, Aurora	27
<b>5/07/2024</b>	Gang of 19 Discussion	11700 Irma Dr, Northglenn	80
<b>5/09/2024</b>	Servicios de la Raza Newcomer Resource Fair	Servicios de la Raza, 3131 W 14 <sup>th</sup> Ave, Denver	150
<b>5/11/2024</b>	Asian-American Pacific Islander Celebration	McNichols Event Center - 144 W. Colfax Ave	275
<b>5/16/2024</b>	Where Did We Sit on the Bus?	1050 13 <sup>th</sup> St, Denver	185
<b>5/17/2024</b>	Place Bridge Academy Career Day	7125 Cherry Creek Dr N, Denver	41
<b>5/18/2024</b>	Women United Village	711 Park Ave W, Denver	56
<b>5/21/2024</b>	DHS Shelter Outreach and Info Session	2601 Zuni St, Denver	120
<b>5/22/2024</b>	Bryant-Webster and RTD: Transit Options for Bryant-Webster Families	Bryant-Webster Dual Language School	5
<b>5/23/2024</b>	Emily Griffiths Spring Fling	1860 Lincoln St 3, Denver	
<b>5/31/2024</b>	My City Academy Resource Tabling and Presentation	North High School, 2960 N Speer Blvd, Denver	35
<b>6/01/2024</b>	Louisville Touch-a-Truck	900 Via Appia Way, Louisville	655+
<b>6/02/2024</b>	Travel Training with the Afghan Circle of Fathers/Empowering Communities Globally	2620 S Parker Rd #270, Aurora	50
<b>6/05/2024</b>	Colorado History Rides – History of RTD	Downtown Denver	30
<b>6/11/2024</b>	Lone Tree Library Transit Themed Storytime	10055 Library Wy, Lone Tree	140
<b>6/19/2024</b>	Village Exchange	1609 Havana St., Aurora	200
<b>6/22/2024</b>	Heal the Hood	5300 Crown Blvd., Denver	225
<b>6/29/2024</b>	Athletics and Beyond	4990 Nome St., Denver	75



## 7.3 Summary of Public Comments

Significant support was provided for the continuation of the Zero Fare for Youth program. Commentors expressed overwhelming enthusiasm noting the program would:

- Supports youth in accessing school and work
- Benefits families who cannot afford fares for multiple children and incentivize larger families who see driving as a more affordable option
- Meets climate goals by encouraging additional ridership
- Provides youth with independence and agency
- Encourages lifelong transit use

## 7.4 Changes to Proposal

Overall, public comments demonstrate immense support for the proposed fare change. Additionally, no items of significant concern were raised in public comments that suggest further review of the recommendation and its impacts on the community is necessary. As such, no changes were proposed to the ZFY program continuation recommendation, and the final Title VI fare equity analysis will be presented on July 23, 2024 to the RTD Board of Directors for review and adoption.

## 7.5 Board Adopted Fare Change

*[This section will be completed upon Board adoption.]*

## 8 Average Fare Analysis Findings

The Average Fare Analysis provides a robust overview of the proposed fare changes. The Average Fare Analysis analyzes the proposed fare changes described in Section 6, namely the introduction of the Zero Fare for Youth program.

The Average Fare Analysis uncovered no Title VI equity concerns using RTD's Board-adopted Title VI Policies. While changes are targeted specifically to Youth customers, the aggregate, systemwide differences between all customers and minority customers and between all customers and low-income customers were within the 5% policy threshold. The proposed fare changes are expected to benefit minority customers and low-income customers to a greater degree than all customers. As such, no mitigations are recommended to proceed with the implementation of the proposed fare changes based on the Average Fare Analysis.

### 8.1 Average Fare Analysis Results

The Average Fare Analysis uncovered no Title VI equity concerns using RTD's Board adopted Title VI Policies, and notes that minority and low-income customers benefit more than the overall population.

A reason that minority and low-income customers benefit to a greater extent than the overall population in the Average Fare Analysis is due to the composition of RTD's customer population and share of ridership by rider category. The share of Youth customers that are minority and low-income are higher than the other rider categories. It is important to recognize that a key assumption in the analysis is that Youth customer demographics align with the demographics of Local, Full Fare customers, as outlined in Section 4.1.2. The methodology of the 2019 CSS specifically avoided targeting youth customers under the age of 18, so this customer group is underrepresented in the 2019 CSS, representing less than 2% of customers in the survey. This leaves open the possibility that the demographics of Youth customers are different than what was assumed in the analysis, which would change the results of the Average Fare Analysis. Without any comprehensive survey data on the demographics of RTD Youth customers, the assumption is used for the Average Fare Analysis.

**Appendix B** provides the detailed tables that show the average fare for each rider category and fare payment type under the current and proposed fare structure. A summary overview of the findings resulting from the change, including the Average Fare per Boarding, Absolute Change and Percentage Change are presented in Table 7 with the following description:

- Changes that represent a greater percentage decrease than the overall population (i.e., more beneficial for minority and/or low-income customers) are highlighted in green.
- Changes that represent a lesser percentage decrease than the overall population (i.e., less beneficial for minority and/or low-income customers) are highlighted in yellow.
- Changes that are outside the Disparate Impact/Disproportionate Burden threshold (+5%) are highlighted in light / deep red.

Table 7: Summary Change in Average Fare Per Boarding

Change in Average Fare Per Boarding														
Fare Payment Type	All Customers				Minority Customers					Low-Income Customers				
	Change in Avg Fare per Boarding	% Change	Boardings	% of All Customer Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Minority Boardings	% of All Minority Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Low-Income Boardings	% of All Low-Income Boardings
Full Fare, 3-Hour Pass	\$0.00	0.0%	4,064,234	9.1%	\$0.00	0.0%	0.0%	1,853,187	11.2%	\$0.00	0.0%	0.0%	1,928,997	12.1%
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$0.00	0.0%	2,004,981	4.5%	\$0.00	0.0%	0.0%	392,103	2.4%	\$0.00	0.0%	0.0%	331,099	2.1%
Full Fare, 10-Ride	\$0.00	0.0%	1,043,144	2.3%	\$0.00	0.0%	0.0%	428,836	2.6%	\$0.00	0.0%	0.0%	347,560	2.2%
Full Fare, Day Pass	\$0.00	0.0%	6,668,035	14.9%	\$0.00	0.0%	0.0%	3,025,714	18.3%	\$0.00	0.0%	0.0%	2,424,610	15.3%
Full Fare, Electronic Day Pass / Fare Capping	\$0.00	0.0%	3,486,202	7.8%	\$0.00	0.0%	0.0%	1,164,147	7.0%	\$0.00	0.0%	0.0%	555,044	3.5%
Full Fare, Monthly Pass/Cap	\$0.00	0.0%	3,868,881	8.6%	\$0.00	0.0%	0.0%	1,372,748	8.3%	\$0.00	0.0%	0.0%	901,947	5.7%
LIVE, Electronic 3-Hour Pass / Fare Capping	\$0.00	0.0%	124,683	0.3%	\$0.00	0.0%	0.0%	60,735	0.4%	\$0.00	0.0%	0.0%	107,603	0.7%
LIVE, 10-Ride	\$0.00	0.0%	4,104	0.0%	\$0.00	0.0%	0.0%	1,999	0.0%	\$0.00	0.0%	0.0%	3,541	0.0%
LIVE, Electronic Day Pass / Fare Capping	\$0.00	0.0%	190,086	0.4%	\$0.00	0.0%	0.0%	92,593	0.6%	\$0.00	0.0%	0.0%	164,046	1.0%
Full Fare -> Expanded LIVE, Electronic 3-Hour Pass / Fare Ca	\$0.00	0.0%	15,544	0.0%	\$0.00	0.0%	0.0%	8,036	0.0%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LIVE, 10-Ride	\$0.00	0.0%	518	0.0%	\$0.00	0.0%	0.0%	270	0.0%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LIVE, Electronic Day Pass / Fare Capi	\$0.00	0.0%	23,102	0.1%	\$0.00	0.0%	0.0%	11,771	0.1%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LIVE, Monthly Pass/Cap	\$0.00	0.0%	17,291	0.0%	\$0.00	0.0%	0.0%	8,884	0.1%	n/a	n/a	n/a	-	0.0%
Youth, 3-Hour Pass	-\$0.41	-100.0%	1,157,628	2.6%	-\$0.41	-100.0%	0.0%	530,072	3.2%	-\$0.41	-100.0%	0.0%	544,022	3.4%
Youth, Electronic 3-Hour Pass / Fare Capping	-\$0.23	-100.0%	519,059	1.2%	-\$0.23	-100.0%	0.0%	100,928	0.6%	-\$0.23	-100.0%	0.0%	88,982	0.6%
Youth, 10-Ride	-\$0.47	-100.0%	293,738	0.7%	-\$0.47	-100.0%	0.0%	125,506	0.8%	-\$0.47	-100.0%	0.0%	105,517	0.7%
Youth, Day Pass	-\$0.28	-100.0%	977,338	2.2%	-\$0.28	-100.0%	0.0%	542,966	3.3%	-\$0.28	-100.0%	0.0%	463,609	2.9%
Youth, Electronic Day Pass / Fare Capping	-\$0.16	-100.0%	636,671	1.4%	-\$0.16	-100.0%	0.0%	297,113	1.8%	-\$0.16	-100.0%	0.0%	153,273	1.0%
Youth, Monthly Pass/Cap	-\$0.27	-100.0%	3,278,599	7.3%	-\$0.27	-100.0%	0.0%	1,197,662	7.2%	-\$0.27	-100.0%	0.0%	839,448	5.3%
Senior/Disabled, 3-Hour Pass	\$0.00	0.0%	1,380,298	3.1%	\$0.00	0.0%	0.0%	544,688	3.3%	\$0.00	0.0%	0.0%	717,243	4.5%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.00	0.0%	376,103	0.8%	\$0.00	0.0%	0.0%	141,879	0.9%	\$0.00	0.0%	0.0%	187,049	1.2%
Senior/Disabled, 10-Ride	\$0.00	0.0%	513,507	1.1%	\$0.00	0.0%	0.0%	156,459	0.9%	\$0.00	0.0%	0.0%	237,795	1.5%
Senior/Disabled, Day Pass	\$0.00	0.0%	3,218,739	7.2%	\$0.00	0.0%	0.0%	1,062,589	6.4%	\$0.00	0.0%	0.0%	1,500,417	9.5%
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.00	0.0%	723,994	1.6%	\$0.00	0.0%	0.0%	230,983	1.4%	\$0.00	0.0%	0.0%	309,364	1.9%
Senior/Disabled, Monthly Pass/Cap	\$0.00	0.0%	3,850,899	8.6%	\$0.00	0.0%	0.0%	1,223,565	7.4%	\$0.00	0.0%	0.0%	2,383,216	15.0%
Bulk Purchase	\$0.00	0.0%	2,839,410	6.3%	\$0.00	0.0%	0.0%	1,023,160	6.2%	\$0.00	0.0%	0.0%	1,008,397	6.4%
EcoPass (Business)	\$0.00	0.0%	2,650,675	5.9%	\$0.00	0.0%	0.0%	617,285	3.7%	\$0.00	0.0%	0.0%	186,283	1.2%
EcoPass (NECO)	\$0.00	0.0%	175,506	0.4%	\$0.00	0.0%	0.0%	25,821	0.2%	\$0.00	0.0%	0.0%	47,580	0.3%
CollegePass	\$0.00	0.0%	714,662	1.6%	\$0.00	0.0%	0.0%	267,352	1.6%	\$0.00	0.0%	0.0%	321,626	2.0%
Semester Pass	\$0.00	0.0%	37,702	0.1%	\$0.00	0.0%	0.0%	15,022	0.1%	\$0.00	0.0%	0.0%	18,851	0.1%
<b>Total</b>	<b>-\$0.04</b>	<b>-4.2%</b>	<b>44,855,331</b>	<b>100%</b>	<b>-\$0.05</b>	<b>-5.2%</b>	<b>-0.9%</b>	<b>16,524,071</b>	<b>100%</b>	<b>-\$0.04</b>	<b>-5.1%</b>	<b>-0.8%</b>	<b>15,877,120</b>	<b>100%</b>
<div> <div></div> More Beneficial <div></div> Same <div></div> Less Beneficial <div></div> Much Less Beneficial <div></div> Worse </div>														

### 8.1.1 Key Findings

The key findings are reflected below:

- When viewing the fare change from a total system perspective, the average fare for the proposed change is \$1.01 per boarding for all customers, \$0.92 for minority customers (9% lower than for all customers) and \$0.80 for low-income customers (21% lower than for all customers).
- As a whole, minority and low-income populations experience a greater decrease in their average fare than the overall customer population. Minority customers experience a 5.2% decrease in their average fare per boarding and low-income customers experience a 5.1% decrease, compared with a 4.2% decrease experienced by the overall customer population.
- No groups are anticipated to see an increase in their average fare with the proposed changes.
- As discussed in Section 4.1.3, the analysis assumes no change in the average fare paid by participants in the three EcoPass programs (business EcoPass, neighborhood EcoPass and CollegePass). It is likely that participants in these programs will eventually benefit from lower contract pricing with the introduction of the Zero Fare for Youth program, but given that (1) students in these programs do not pay on a per-boarding basis, (2) organizations have some discretion as to how to apply contract pricing reductions, and (3) with little detail on specific demographics by contract and by age group, the analysis cannot fairly assess potential changes in the average fare. By assuming no change in the average fare for the Pass Programs, the analysis is likely conservative and understates the fare reduction benefits of the Zero Fare for Youth program.

### 8.1.2 Overview of Overall Findings

Table 8 provides the systemwide analysis comparing the average fare for minority customers to the overall customer population. For minority customers, the average fare decreases from \$0.97 to \$0.92, a 5.2% decrease. For all customers, the average fare decreases from \$1.05 to \$1.01, a 4.2% decrease. The percentage point difference between the percentage change for minority customers and all customers is 1%, indicating that minority customers are expected to benefit somewhat more than all customers as a result of the proposed fare changes. Applying this difference in average fare changes to RTD's Disparate Impact Burden threshold, the fare changes do not represent a Disparate Impact on minority customers as the percentage point difference in percentage change in average fare from the proposed fare changes does not exceed RTD's 5% threshold.

**Table 8: Average Fare for Minority Customers**

All Customers			Minority Customers		
Number of Boardings	Current Average Fare	Proposed Average Fare	Number of Boardings	Current Average Fare	Proposed Average Fare
44,855,331	\$1.05	\$1.01	16,524,071	\$0.97	\$0.92
% Change in Average Fare		-4.2%	% Change in Average Fare		-5.2%
Difference between Minority Customers and All Customers					1.0%

Table 9 presents the systemwide analysis comparing the average fare for low-income customers to the overall customer population. For low-income customers, the average fare decreases from \$0.84 to \$0.80, a 5.1% decrease. For all customers, the average fare decreases from \$1.05 to \$1.01, a 4.2% decrease. The percentage point difference between the percentage change for low-income customers and all customers is less than 1%,

indicating that low-income customers are expected to benefit more than all customers as a result of the proposed fare changes. Applying this difference in average fare changes to RTD's Disproportionate Burden threshold, the fare changes do not represent a Disproportionate Burden on low-income customers as the percentage point difference in percentage change in average fare from the proposed fare changes does not exceed RTD's 5% threshold.

**Table 9: Average Fare for Low-Income Customers**

All Customers			Low-Income Customers		
Number of Boardings	Current Average Fare	Proposed Average Fare	Number of Boardings	Current Average Fare	Proposed Average Fare
44,855,331	\$1.05	\$1.01	15,877,120	\$0.84	\$0.80
% Change in Average Fare		-4.2%	% Change in Average Fare		-5.1%
Difference between Low-Income Customers and All Customers					-0.9%

## 9 Cumulative Findings and Mitigations

Zero Fare for Youth aims to enhance the lives of RTD customers and communities by reducing transportation costs for families. By inviting youth ages 19 and under to ride the bus and train at no cost, the program seeks to remove barriers to education and employment, while creating access to destinations across the metro Denver region.

The proposed fare change for a permanent no cost fare for youth ages 19 and under do not appear to create any Disparate Impacts on minority communities, nor does it appear to create any Disproportionate Burdens on low-income communities. As such, no mitigations are needed in order to proceed with the implementation of the proposed fare change.

## 10 Next Steps

It is important to note that this Fare Equity Analysis represents the impacts associated with the proposed fare change upon full implementation as adopted by the Board of Directors. As such, should any of the proposed changes be determined to be technically or administratively unfeasible, a new Fare Equity Analysis would be required for any proposed changes to the adopted program in order to comply with federal Title VI guidance. Additionally, if the agency implements the fare change in a way that is inconsistent with what was adopted, the agency may need to undertake a new Fare Equity Analysis.

*[This section will be completed once RTD's Board of Directors has been made aware and considered this equity analysis.]*

## Appendix A: Zero Fare for Youth Survey Analysis Report



# Zero Fare for Youth Survey Analysis Report

Prepared by Jake Stoudenmire, Market Research Manager | April 2024



# Zero Fare for Youth Survey Analysis Report

## Table of Contents

Section I: Survey Methodology.....2

Section II: Survey Results.....3

Appendix A: Survey Instrument.....21

# **Zero Fare for Youth Survey Analysis Report**

## **Section I: Survey Methodology**

The development of the Zero Fare for Youth survey effort began in Summer 2023. Originally, this effort was to include a pre, mid, and post-test survey of a randomly selected group of students and their families. To achieve this and considering it would be inappropriate for RTD to have access to school contact lists, RTD sought out partnerships with numerous local school districts that would facilitate and administer the survey's distribution to the selected families. A representative sampling plan (by enrollment) was developed by RTD and each district was provided with a random number sequence as well as detailed instructions on how to apply these number sequences to their contact lists to select the participating families. Unfortunately, engagement with all but one of the district representatives seemingly ceased upon distribution of the random selection number sequences.

In an attempt to continue the collection of feedback and experiences of youth taking advantage of the Zero Fare for Youth pilot, RTD decided to distribute this survey instrument to numerous youth-serving organizations, recreation centers and libraries across RTD's service area. At this point, the survey ceased to be randomly selected, and became a self-selection study.

It should be noted that while the data collected in this effort is still valid feedback directly from RTD customers and youths participating in Zero Fare for Youth pilot, and while general reporting and comparative analysis can be and was performed on this data, predictive statistical analysis could not be performed as this study did not contain a random sample of participants.

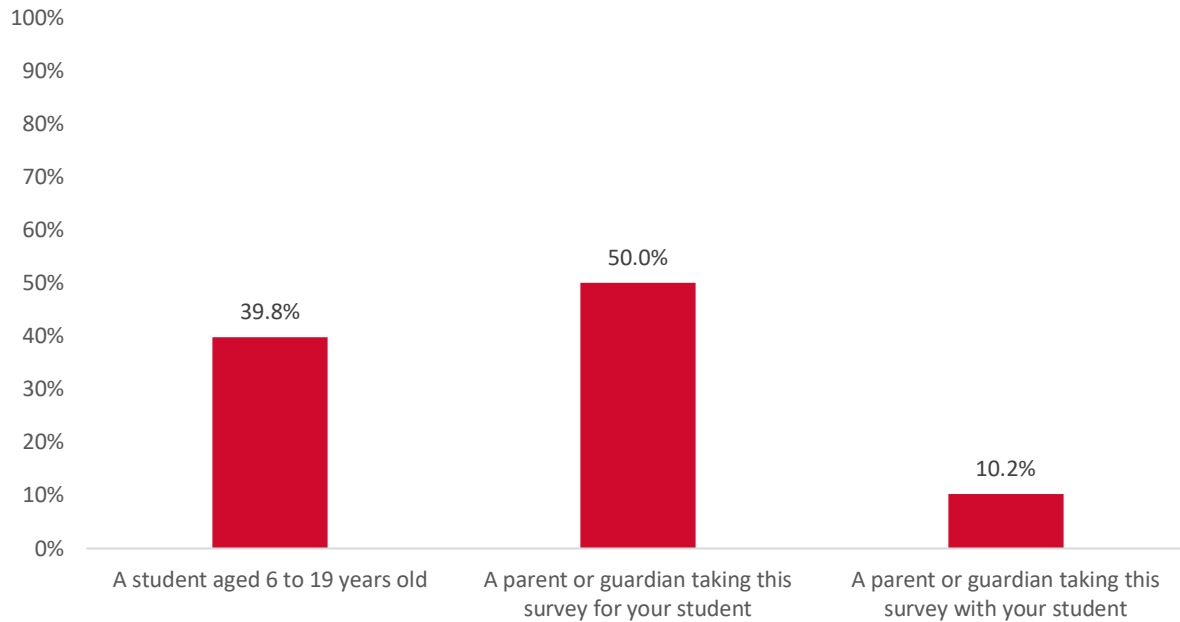
The survey itself consists of 31 questions and gathered feedback and information on: rider experience, individual and household transit habits, and personal as well as household demographics. A total of 232 surveys were completed and the reporting and analysis of the survey responses are provided in the next section.

# Zero Fare for Youth Survey Analysis Report

## Section II: Survey Results

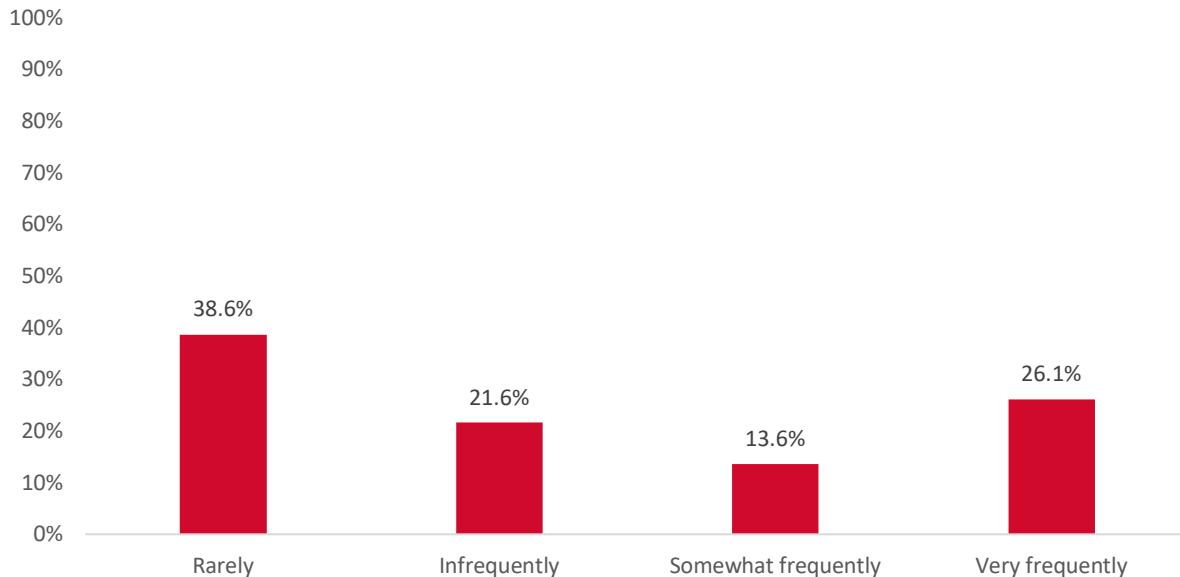
### Question 1:

*Please tell us if you are:*



### Question 2:

*Aside from your student, how often would you say that you or anyone else in your household use RTD services?*

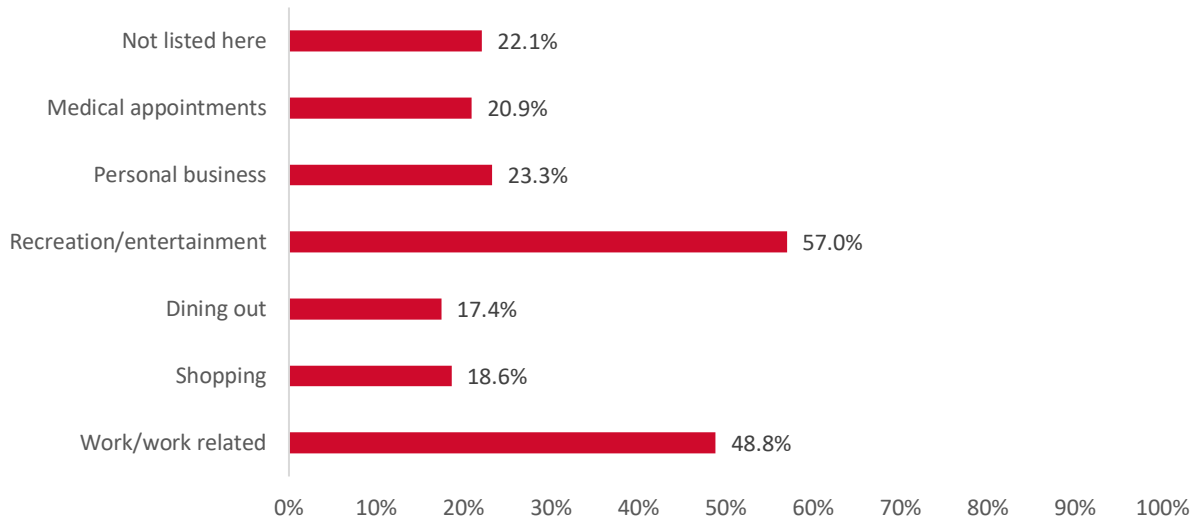


- This question was only asked of respondents who reported that they were an adult taking this survey either with or for their student

# Zero Fare for Youth Survey Analysis Report

## Question 3:

*Aside from your student, where are other members of your household most frequently traveling to and from when using RTD services? Please select all that apply:*



- This question was only asked of respondents who reported that they were an adult taking this survey either with or for their student

## Question 3 Specified Answers:

- Airport – 84%
- Grocery shopping – 5%
- School – 5%

*Question 4: How many private vehicles (cars, trucks, SUVs) do you have access to, as either a driver or passenger, in your household?*

- Average: 1.6
- Median: 2
- Minimum: 0
- Maximum: 5

# Zero Fare for Youth Survey Analysis Report

*Cross-tabulation with Question 2: Aside from your student, how often would you say that you or anyone else in your household use RTD services?*

**Aside from your student, how often would you say that you or anyone else in your household use RTD services?**

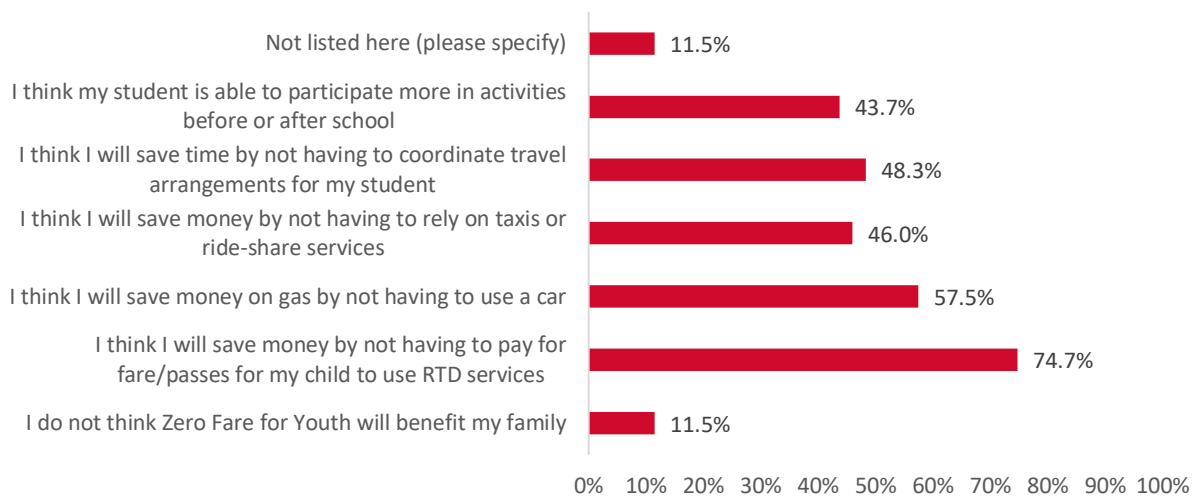
**Average number of Vehicles**

Rarely	1.9
Infrequently	1.8
Somewhat frequently	1.4
Very frequently	1

- Households with more fewer vehicles available appear to utilize RTD services more frequently

**Question 5:**

What potential benefits do you think the Zero Fare for Youth pilot could have for your family over the next year? Please select all that apply:



**Question 5 Specified Answers:**

- It will reduce traffic congestion at schools and create safer routes for walkers and bike riders.
- Encourage public transportation use for ease and environmental reasons
- Help my kids ride RTD Independently
- I support for our youth
- decrease traffic
- Provide more access to Denver metro activities and museums
- I think they will be able to go places that they wouldn't be able to if they were depending on parents for a ride. for example Elitchs
- I take children from my kids program on rtd
- Zero Youth Fares do not effect me; I am an elder least able to pay.
- I'm a mental health provider, not a child's guardian.

# Zero Fare for Youth Survey Analysis Report

*Question 6: What school does your student currently attend?*

## Schools

Arvada West	1.2%
Aurora Central	3.7%
Boulder High School	1.2%
Cherry Creek	1.8%
DCIS – Baker	1.2%
Denver Montessorie	1.8%
East High School	6.1%
Fairview High School	5.5%
Gateway High School	1.2%
George Washington High School	1.2%
Green Mountain High School	1.2%
Hinkley High School	3.1%
Monarch High School	1.2%
Montbello High School	1.2%
Montbello Middle School	1.2%
Morey Middle School	1.8%
Niwot High School	1.8%
North High School	1.2%
Northfield High School	3.7%
Overland High School	1.2%
Smokyhill High School	1.8%
Standley Lake High School	2.5%
Thomas Jefferson High School	1.8%
UC Denver	1.2%
All other schools	49.7%

- The list above represents schools that were reported twice. The “All other schools” category consists of all schools that were only mentioned once.

# Zero Fare for Youth Survey Analysis Report

*Question 7: What grade is your student currently in at school?*

## Grade Level

Kindergarten/Pre-K	2.4%
First	1.8%
Second	2.4%
Third	2.9%
Fourth	1.8%
Fifth	2.9%
Sixth	4.1%
Seventh	6.5%
Eight	7.1%
Ninth	24.7%
Tenth	14.1%
Eleventh	14.1%
Twelfth	13.5%
College	1.8%

- The responses skew towards the older youths, which could indicate that parents may not be comfortable with their younger children riding on public transit. Additionally, the responses start to dip around the age-range where youths would be obtaining their driver's licenses

*Question 8: About how far (in miles) does your family live from your student's school?*

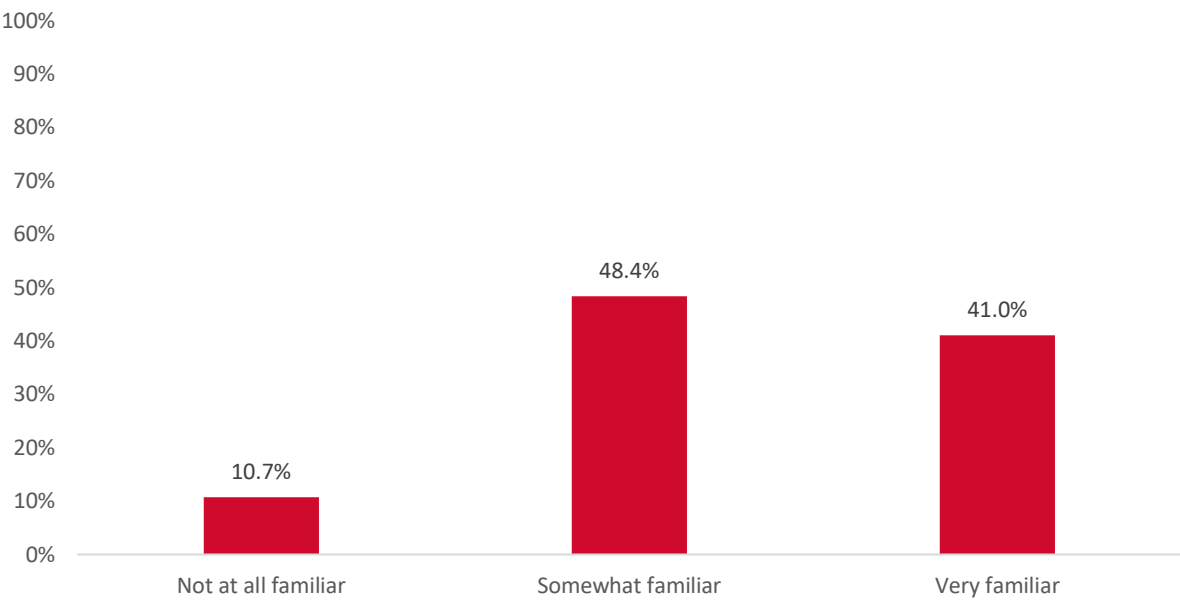
- Average: 5.94 miles
- Median: 4 miles
- Minimum: 0.1 miles
- Maximum: 60 miles



# Zero Fare for Youth Survey Analysis Report

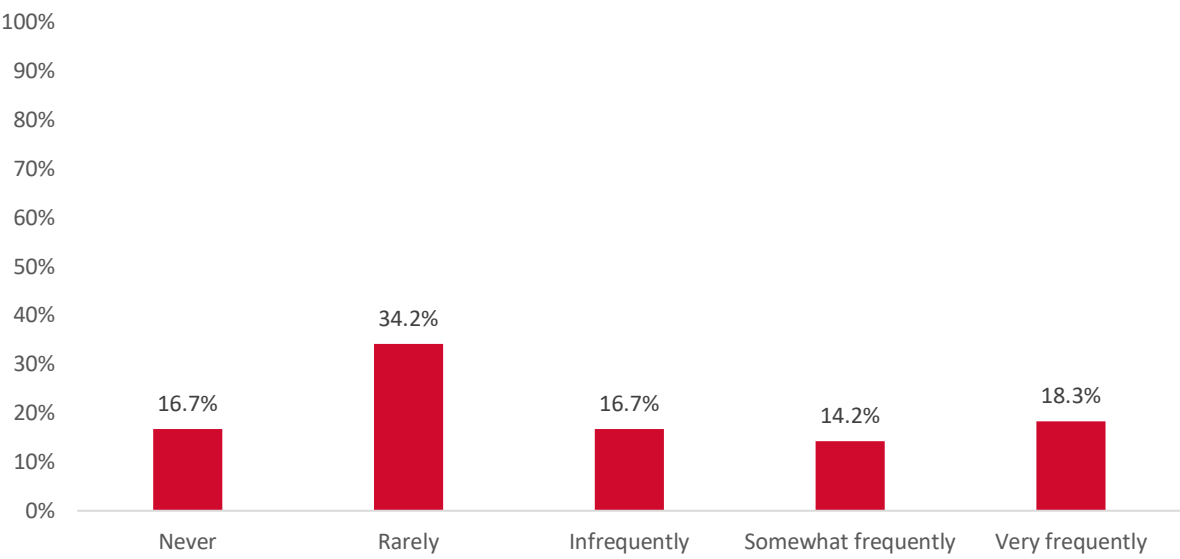
## Question 9:

How familiar is your student with RTD and its services?



## Question 10:

Prior to the start of the Zero Fare for Youth event on September 1, 2023, about how often would your student use RTD services?



# Zero Fare for Youth Survey Analysis Report

*Cross-tabulation with Question 8:*

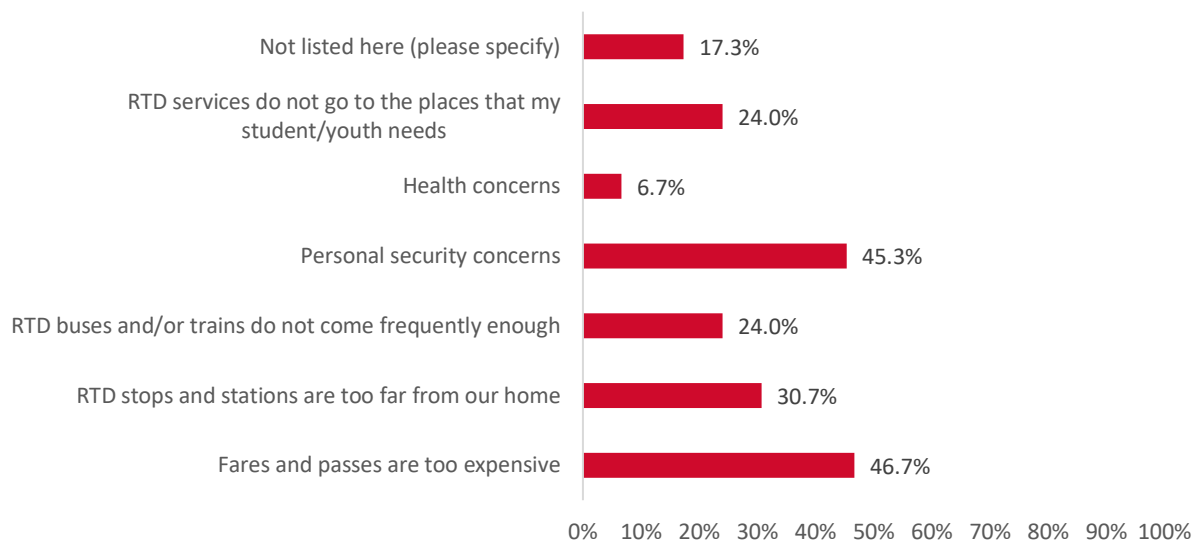
**Prior to the start of the Zero Fare for Youth event on September 1, 2023, about how often would your student use RTD services?**

**Average distance**

Never	5.5
Rarely	6.1
Infrequently	5.3
Somewhat frequently	4.5
Very frequently	7.6

*Question 11:*

Is there anything that kept your student from using RTD services more often? Please select all that apply:

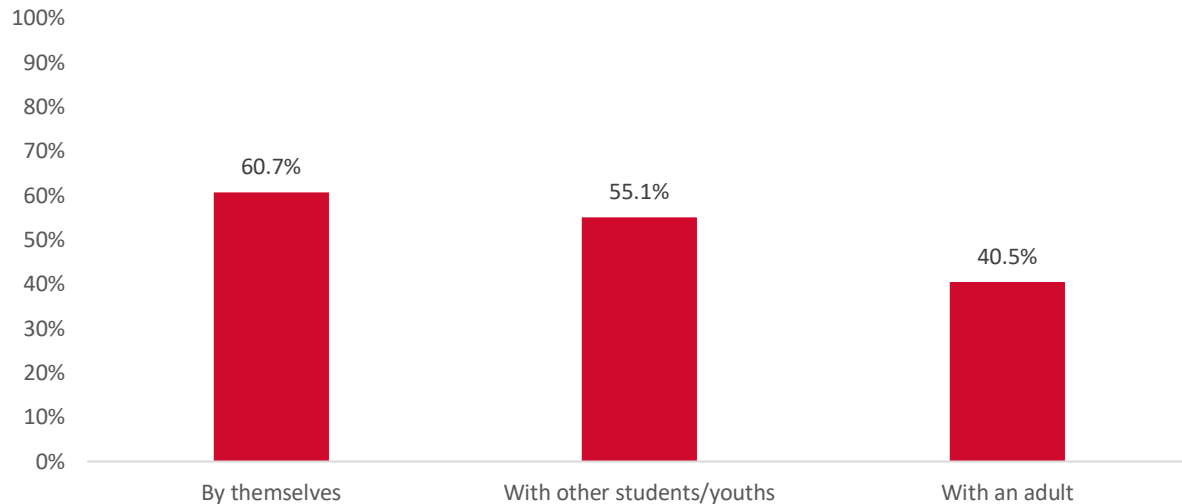


# Zero Fare for Youth Survey Analysis Report

## Question 12:

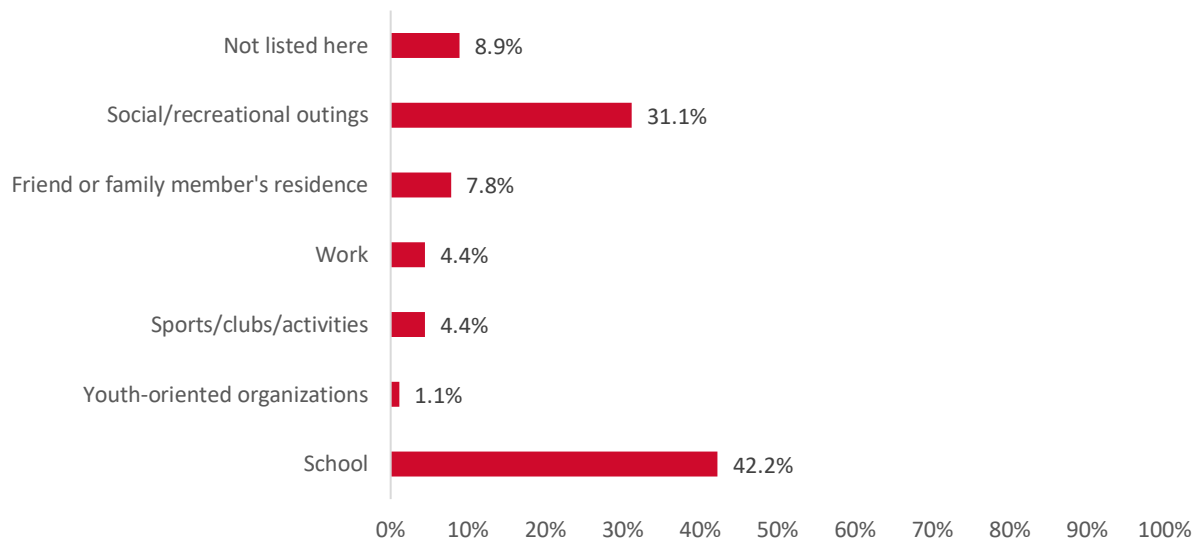
When your student does use RTD services, are they by themselves, with an adult, or with other students/youths?

Please select all that apply:



## Question 13:

Where is your student most frequently traveling to and from when using RTD services?



Question 14: About how long does it typically take your student to reach their destination when using RTD services?

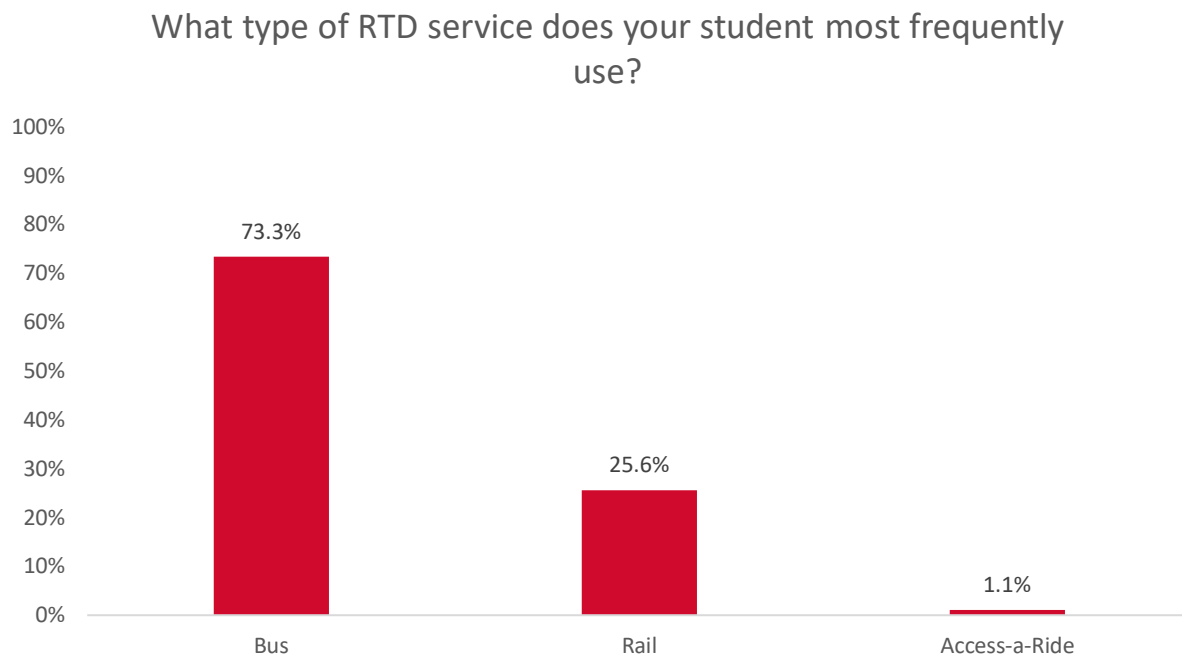
- Average: 47.2 minutes
- Median: 40 minutes
- Minimum: 5 minutes
- Maximum: 165 minutes

# Zero Fare for Youth Survey Analysis Report

*Cross-tabulation with Question 13:*

Where is your student most frequently traveling to and from when using RTD services?	Average time in minutes
School	44.4
Youth-oriented organizations	47.5
Sports/clubs/activities	73.8
Work	49.3
Friend or family member's residence	56.3
Social/recreational outings	40.7

*Question 15:*



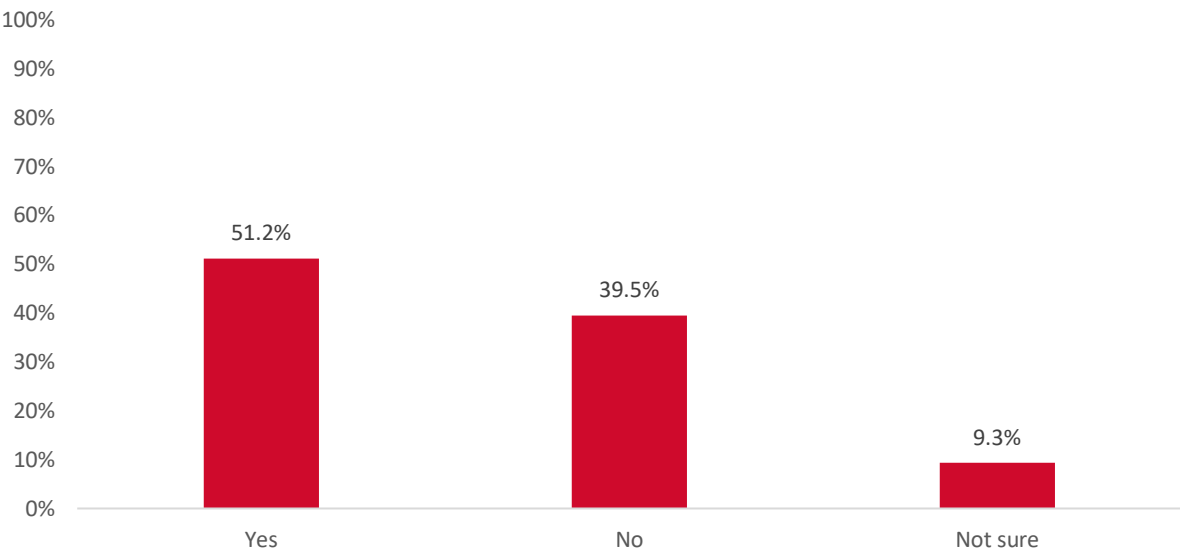
*Question 18: About how far from your home is the bus stop/rail station that your student uses most frequently?*

- Average: 2.2 miles
- Median: 1 mile
- Minimum: 0.1 miles
- Maximum: 23 miles

# Zero Fare for Youth Survey Analysis Report

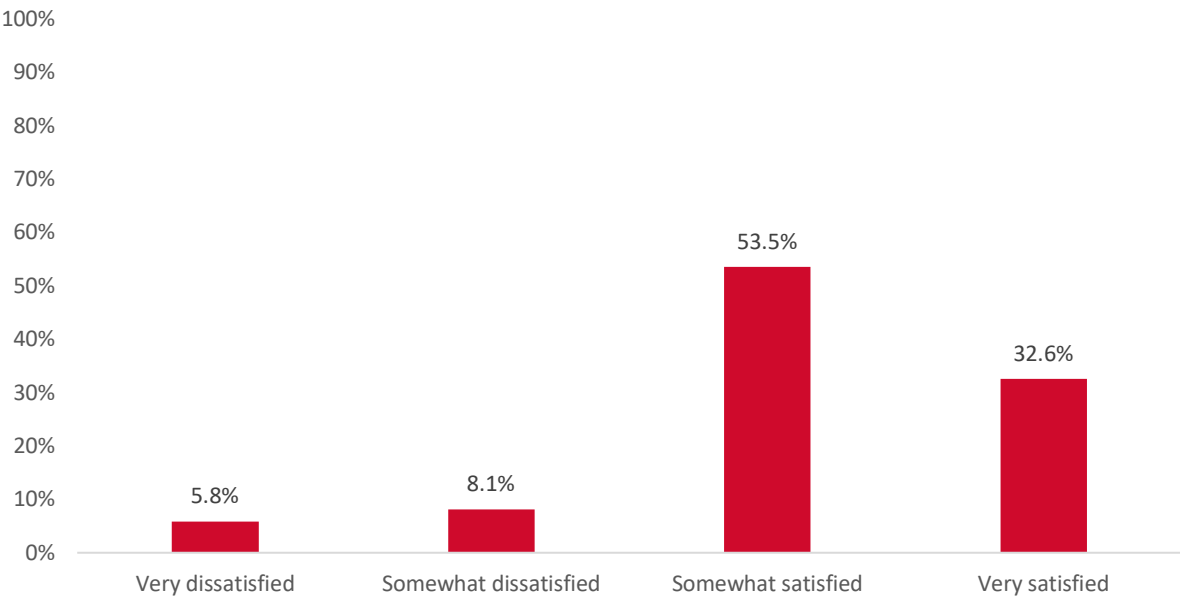
## Question 19:

Does your student ever have to make a transfer when using RTD services?



## Question 20:

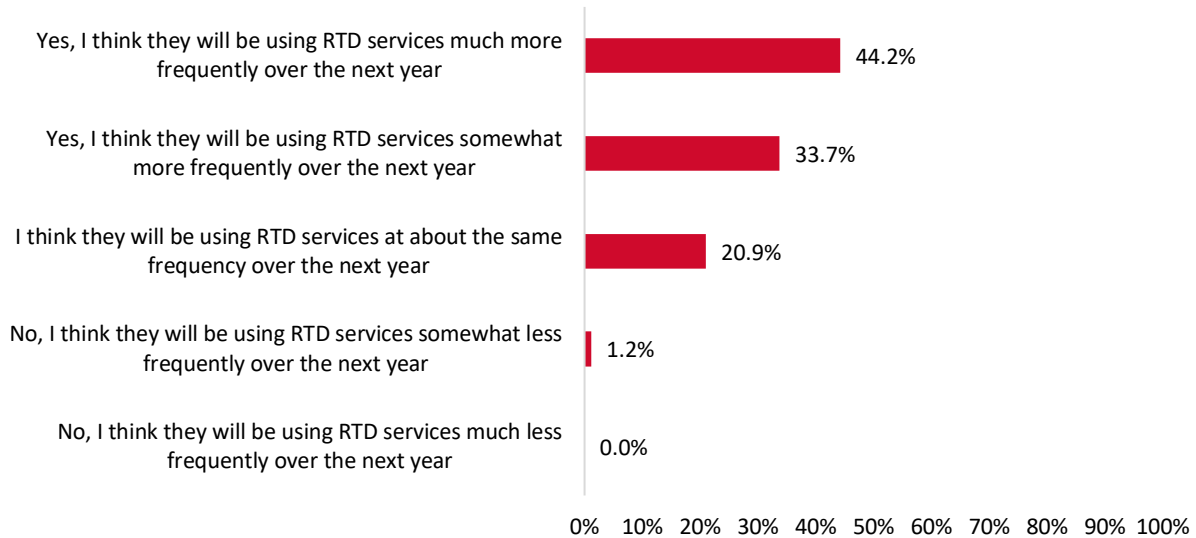
Overall, how satisfied is your student with RTD services?



# Zero Fare for Youth Survey Analysis Report

## Question 21:

Do you think your student will be using RTD services more frequently while they are free during Zero Fare for Youth?



## Cross-tabulation with Question 15:

**Do you think your student will be using RTD services more frequently while they are free during Zero Fare for Youth?**

**Service Type**

	Bus	Rail
Much less	0%	0%
Somewhat less	1.1%	0%
Same frequency	18%	21.7%
Somewhat more	29.2%	52.2%
Much more	51.7%	26.1%

- Regardless of service type, the majority of respondents reported that they felt their youth would be using RTD services more frequently during Zero Fare for Youth

# Zero Fare for Youth Survey Analysis Report

*Cross-tabulation with Question 18:*

**Do you think your student will be using RTD services more frequently while they are free during Zero Fare for Youth?**

**About how far from your home is the bus stop/rail station that your student uses most frequently?**

Much Less	N/A
Somewhat less	0.5 miles
Same frequency	2.5 miles
Somewhat more	2.4 miles
Much more	1.9 miles

*Cross-tabulation with Question 20*

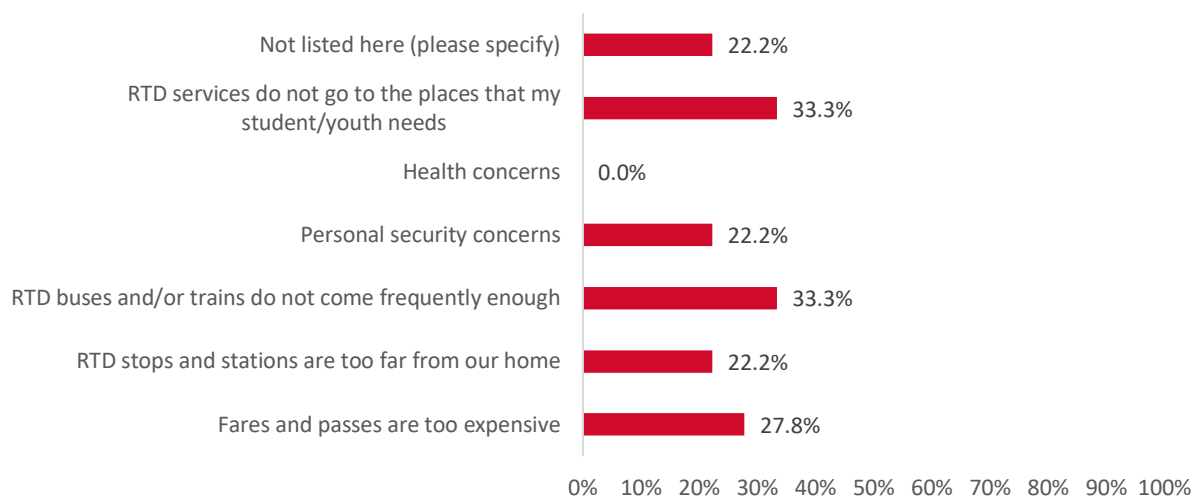
**Overall, how satisfied is your student with RTD services?**

**Do you think your student will be using RTD services more frequently while they are free during Zero Fare for Youth?**

	Much Less	Somewhat Less	Same	Somewhat more	Much more
Very dissatisfied	0.0%	0.0%	0.0%	37.5%	62.5%
Somewhat dissatisfied	0.0%	0.0%	36.4%	36.4%	27.3%
Somewhat satisfied	0.0%	1.7%	22.0%	35.6%	40.7%
Very satisfied	0.0%	0.0%	11.4%	28.6%	60.0%

*Question 22:*

Is there anything that keeps your student from using RTD services? Please select all that apply: (Only asked of those whose child has NEVER used RTD services)

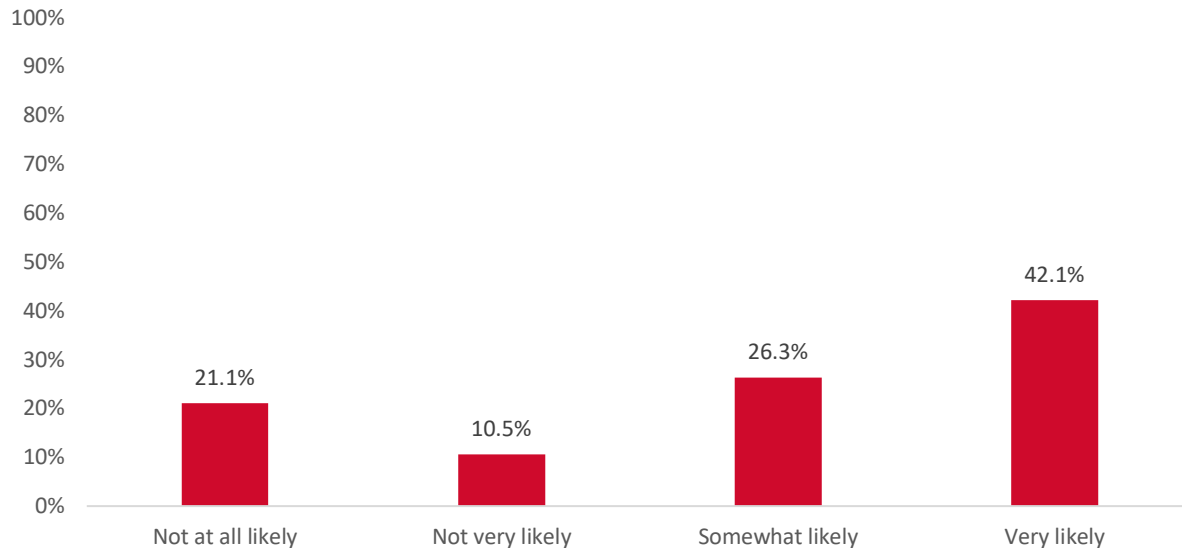




# Zero Fare for Youth Survey Analysis Report

## Question 23:

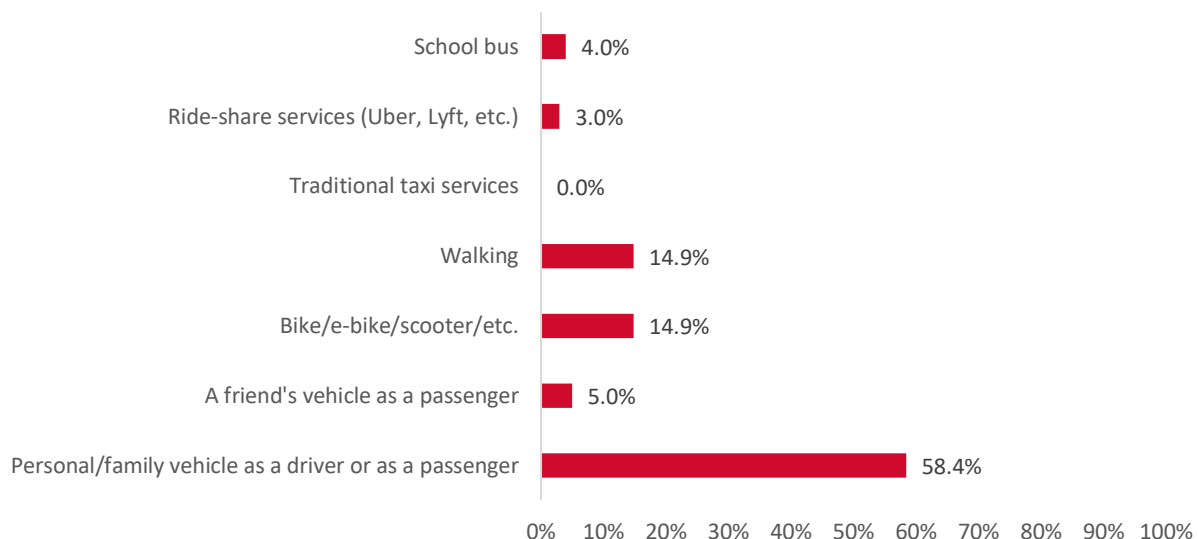
How likely do you think your student is to use RTD services while they are free during Zero Fare for Youth?



- This question was asked only of respondents who answered that their student/youth had never used RTD services prior to Zero Fare for Youth (question 10).
- Even though these students had never used RTD services before, the majority of their parents/guardians felt that their students would somewhat or very likely use RTD services during Zero Fare for Youth.

## Question 24:

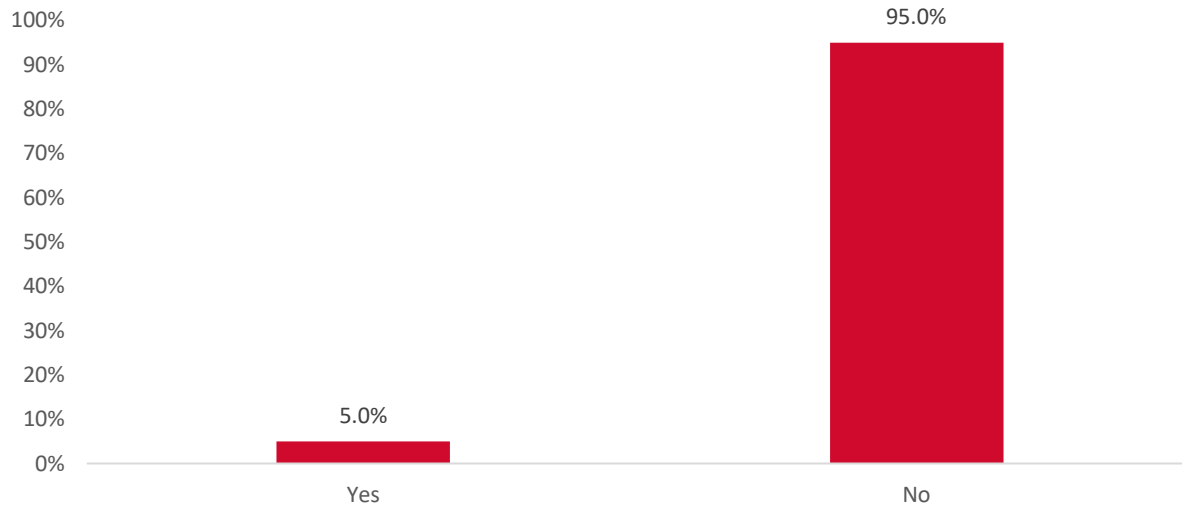
Aside from using any RTD services, how does your student typically get to where they need to go?



# Zero Fare for Youth Survey Analysis Report

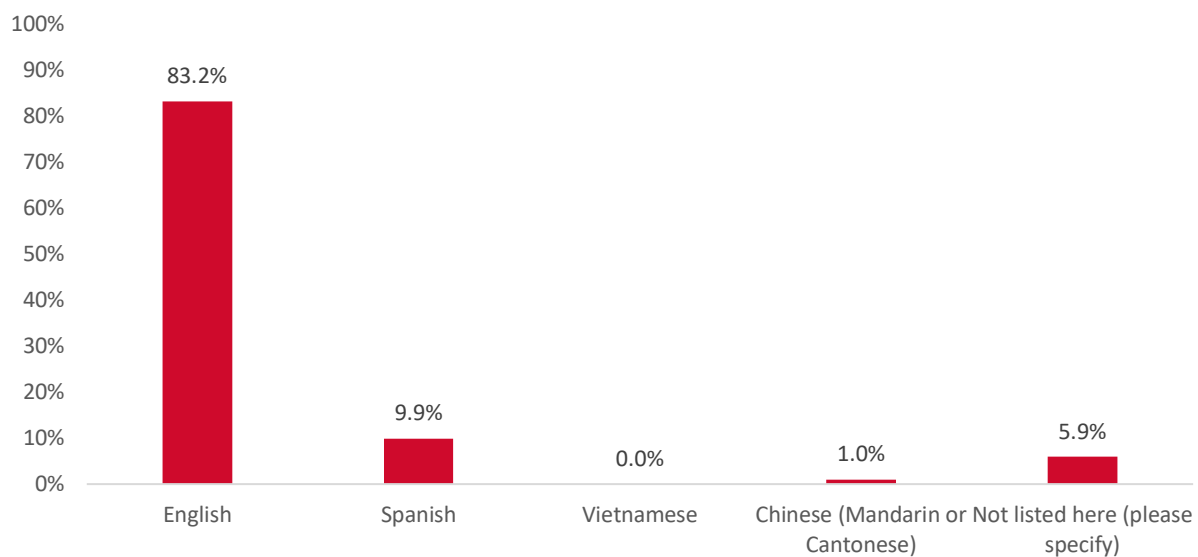
## Question 25:

Do you consider your student to have any disabilities (physical or mental impairments that substantially limits one or more major life activities)?



## Question 26:

What language does your family speak most commonly in your home?

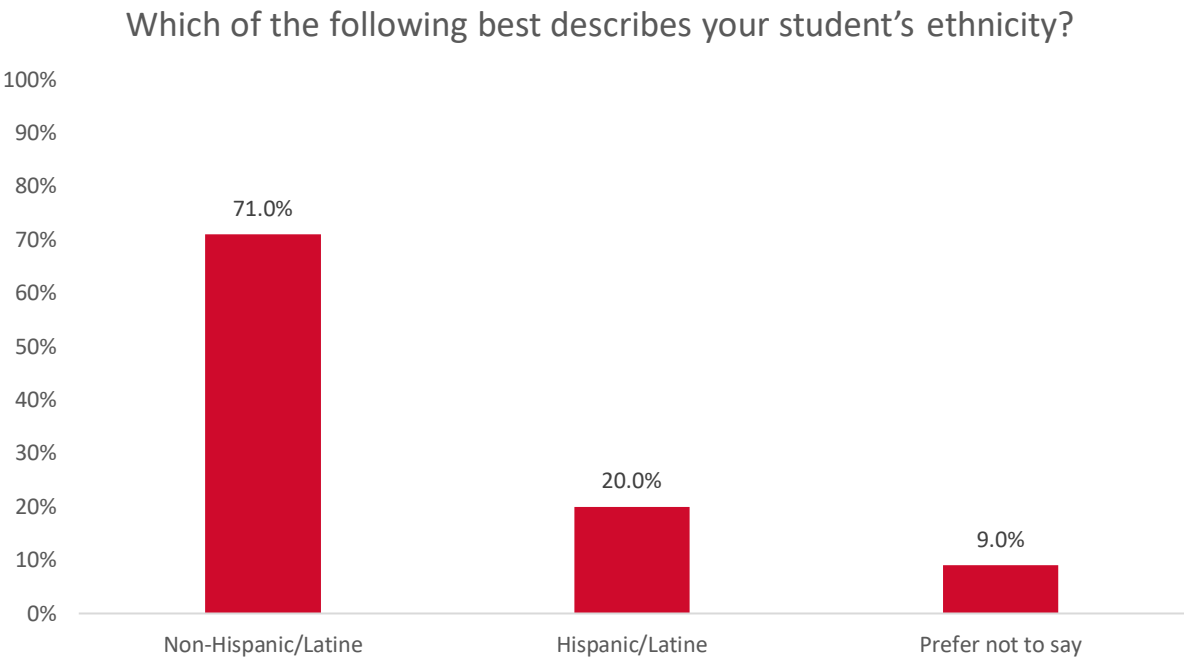


## Question 26 Specified Answers:

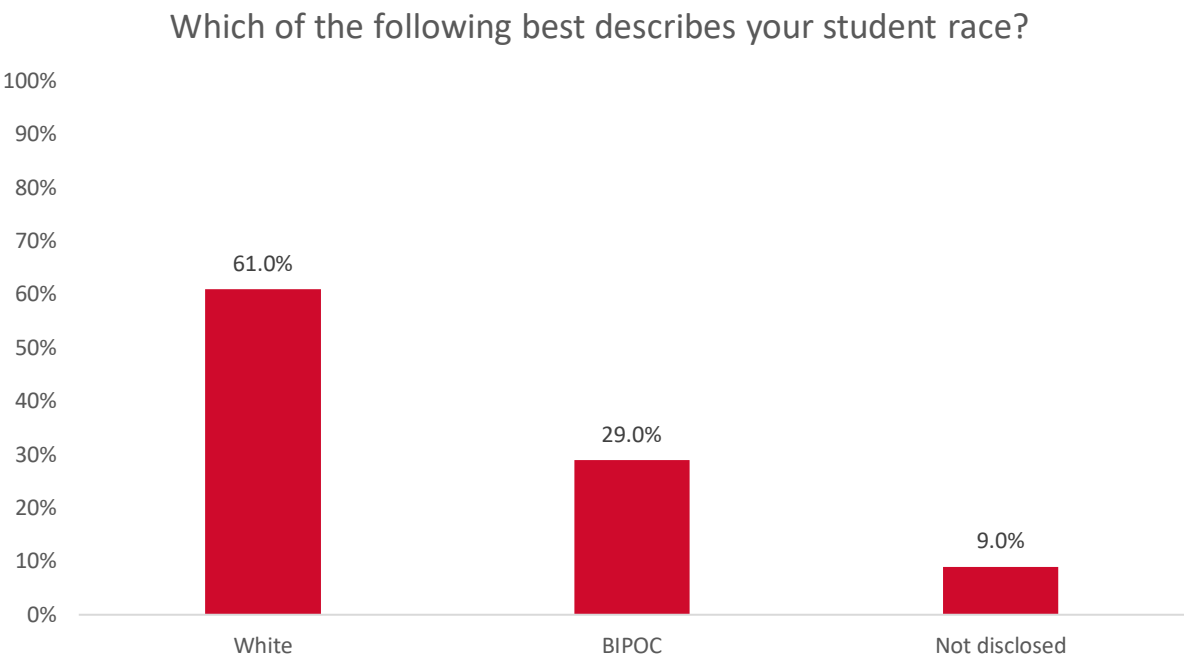
- Portuguese
- Dari
- German
- Polish/Czech
- Swahili

# Zero Fare for Youth Survey Analysis Report

## Question 27:



## Question 28 (condensed):



# Zero Fare for Youth Survey Analysis Report

## Cross-tabulation with Question 15

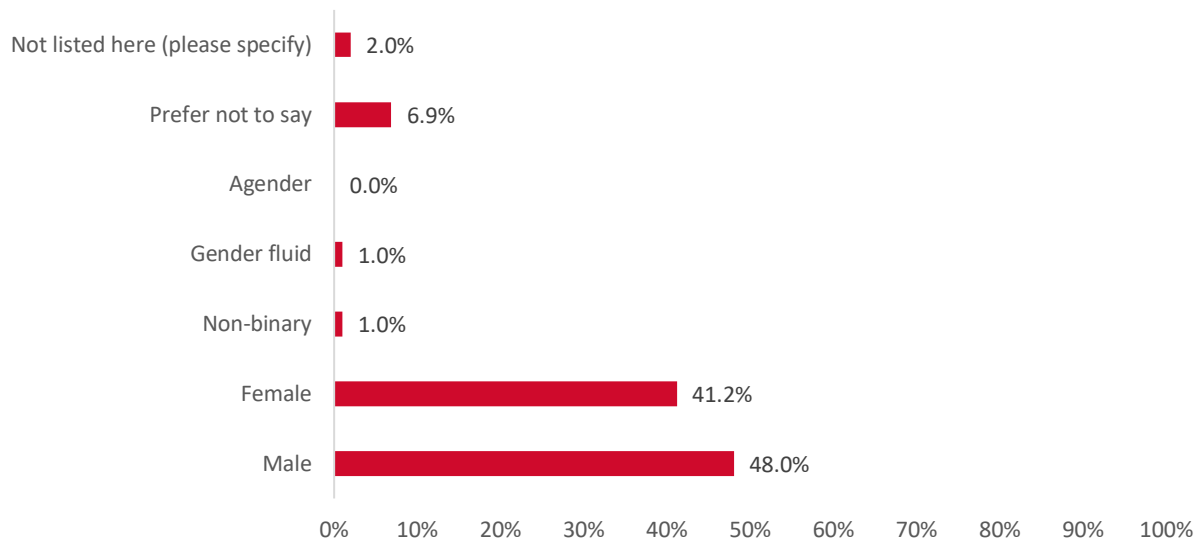
Race	Service Type		
	Bus	Rail	Access-a-Ride
White	79.1%	19.4%	1.5%
BIPOC	73.3%	26.7%	0.0%
Not disclosed	80.0%	20.0%	0.0%

## Cross-tabulation with Question 19

Race (Condensed)	Does your student ever have to make a transfer when using RTD services?		
	Yes	No	Not sure
White	52.2%	40.3%	7.5%
BIPOC	58.6%	34.5%	6.9%
Not disclosed	60.0%	20.0%	20.0%

## Question 29:

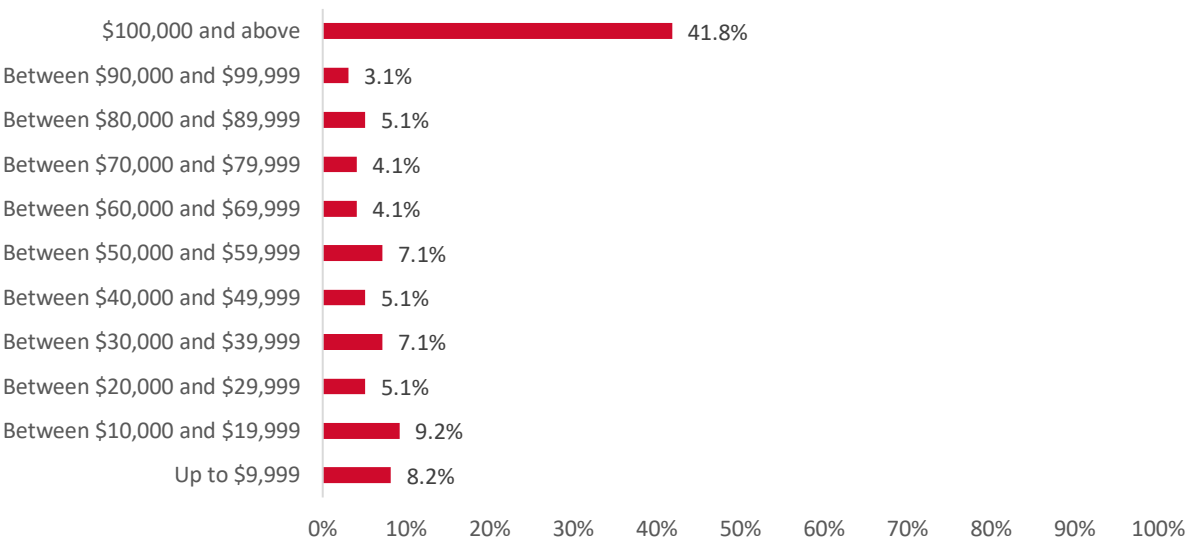
Which of the following best describes your student's gender identity?



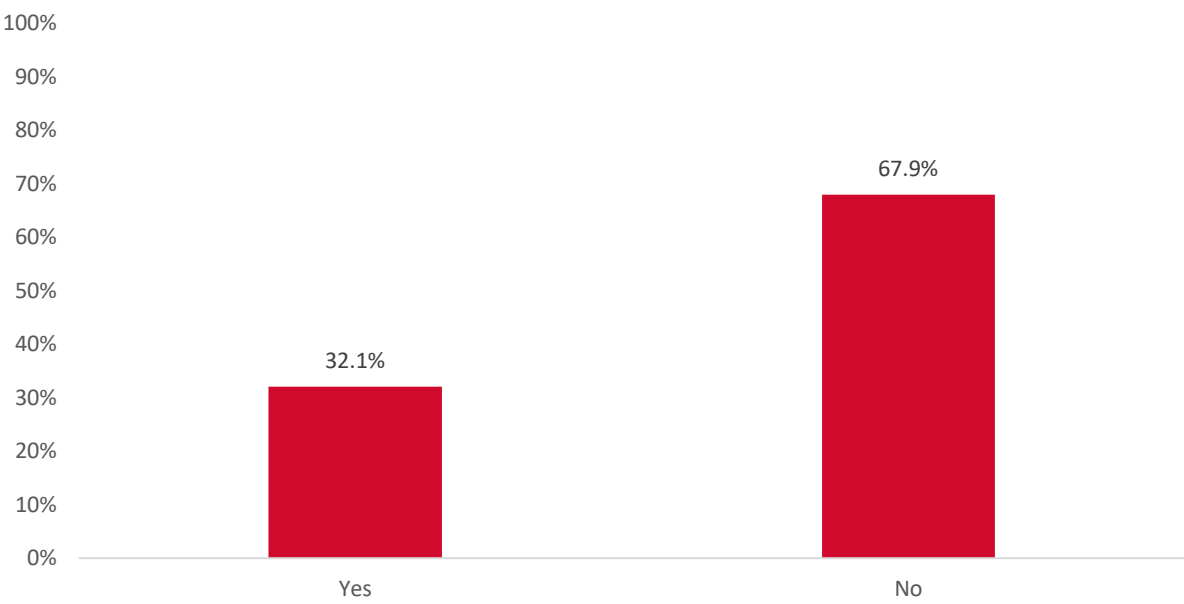
# Zero Fare for Youth Survey Analysis Report

## Question 30:

Which of the following best describes your household’s annual income?



Respondents at or below 150% Federal Poverty Level (FPL)



# Zero Fare for Youth Survey Analysis Report

## Cross-tabulation with Question 15

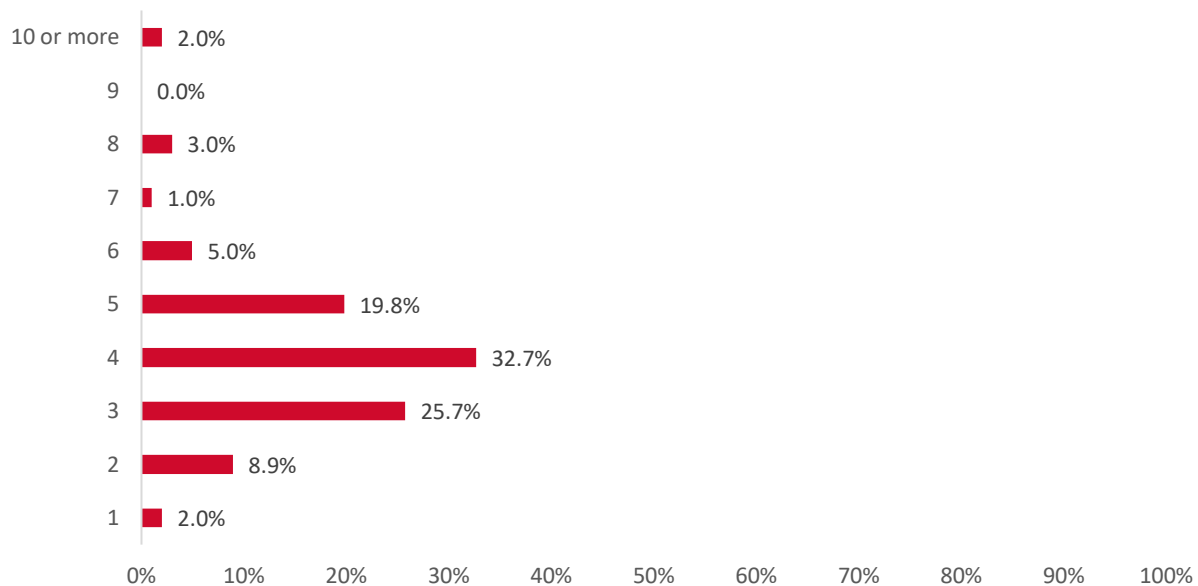
Respondents at or below 150% FPL	Services Type		
	Bus	Rail	Access-a-Ride
Yes	79.4%	20.6%	0%
No	78.3%	20.3%	1.4%

## Cross-tabulation with Question 19

Respondents at or below 150% FPL	Does your student ever have to make a transfer when using RTD services?	
	Yes	No
Yes	67.7%	32.3%
No	56.3%	43.8%

## Question 31:

How many people live in your household?



# Zero Fare for Youth Survey Analysis Report

## Appendix A: Survey Instrument

1. Please tell us if you are:
  - A student aged 6 to 19 years old, taking this survey by yourself *[GO TO Q6]*
  - A parent or guardian, taking this survey FOR your student *[GO TO Q2]*
  - A parent or guardian, taking this survey ALONG WITH your student *[GO TO Q2]*
2. Aside from your student, how often would you say that you or anyone else in your household use RTD services?
  - Rarely; Members of my household use RTD services once a month or less
  - Infrequently; Members of my household use RTD services a few times per month
  - Somewhat frequently; Members of my household use RTD services about once a week
  - Very frequently; Members of my household use RTD services several times or more per week
3. Aside from your student, where are other members of your household most frequently traveling to and from when using RTD services? Please select all that apply.
  - Work/work related
  - Shopping
  - Dining out
  - Recreation/entertainment
  - Personal business
  - Medical appointments
  - Not listed here (please specify)
4. How many private vehicles (cars, trucks, SUVs) do you have access to, as either a driver or passenger, in your household?
5. What potential benefits do you think the Zero Fare for Youth pilot could have for your family over the next year? Please select all that apply
  - I do not think Zero Fare for Youth will benefit my family
  - I think I will save money by not having to pay for fare/passes for my child to use RTD services
  - I think I will save money on gas by not having to use a car
  - I think I will save money by not having to rely on taxis or ride-share services
  - I think I will save time by not having to coordinate travel arrangements for my student
  - I think my student is able to participate more in activities before or after school
  - Not listed here (please specify)
6. What school does your student currently attend?
7. What grade is your student currently in at school?
8. About how far (in miles) does your family live from your student's school?



# Zero Fare for Youth Survey Analysis Report

9. How familiar is your student with RTD and its services?

- ☐ Not at all familiar; they do not know what RTD is and the services it provides
- ☐ Somewhat familiar; they know a little about what RTD is and the services it provides
- ☐ Very familiar; they know a lot about what RTD is and the services it provides

10. Prior to the start of the Zero Fare for Youth event on September 1, 2023, about how often would your student use RTD services?

- ☐ Never; My student has never used RTD services before **[GO TO Q22]**
- ☐ Rarely; My student uses RTD services once a month or less **[GO TO Q11]**
- ☐ Infrequently; My student uses RTD services a few times per month **[GO TO Q11]**
- ☐ Somewhat frequently; My student uses RTD services about once a week **[GO TO Q11]**
- ☐ Very frequently; My student uses RTD services several times or more per week **[GO TO Q12]**

11. Is there anything that kept your student from using RTD services more often? Please select all that apply:

- ☐ Fares and passes are too expensive
- ☐ RTD stops and stations are too far from our home
- ☐ RTD buses and/or trains do not come frequently enough
- ☐ Personal security concerns
- ☐ Health concerns
- ☐ RTD services do not go to the places that my student/youth needs
- ☐ Not listed here (please specify)

12. When your student does use RTD services, are they by themselves, with an adult, or with other students/youths? Please select all that apply:

- ☐ By themselves
- ☐ With other students/youths
- ☐ With an adult

13. Where is your student **most frequently** traveling to and from when using RTD services?

- ☐ School
- ☐ Youth-oriented organizations (YMCA, Boys and Girls Club, etc.)
- ☐ Sports or other after-school clubs/activities
- ☐ Work
- ☐ A friend or family member's residence
- ☐ Social/recreational outings (movies, sporting events, the mall, etc.)
- ☐ Not listed here (please specify)

14. About how long does it typically take your student to reach their destination when using RTD services?

Hours:

Minutes:

## Zero Fare for Youth Survey Analysis Report

15. What type of RTD service does your student **most frequently** use?
- Bus **[GO TO Q17]**
  - Rail **[GO TO Q16]**
  - Access-a-Ride **[GO TO Q18]**
16. What rail line does your student **most frequently** use?
17. What bus route does your student **most frequently** use?
18. About how far from your home is the bus stop/rail station that your student uses most frequently?  
Miles:
19. Does your student ever have to make a transfer when using RTD services?
- Yes
  - No
  - Not sure
20. Overall, how satisfied is your student with RTD services?
- Very dissatisfied
  - Somewhat dissatisfied
  - Somewhat satisfied
  - Very satisfied
21. Do you think your student will be using RTD services more frequently while they are free during Zero Fare for Youth?
- No, I think they will be using RTD services **much less** frequently over the next year **[GO TO Q24]**
  - No, I think they will be using RTD services **somewhat less** frequently over the next year **[GO TO Q24]**
  - I think they will be using RTD services at **about the same** frequency over the next year **[GO TO Q24]**
  - Yes, I think they will be using RTD services **somewhat more** frequently over the next year **[GO TO Q24]**
  - Yes, I think they will be using RTD services **much more** frequently over the next year **[GO TO Q24]**
22. Is there anything that keeps your student from using RTD services? Please select all that apply:
- Fares and passes are too expensive
  - RTD stops and stations are too far from our home
  - RTD buses and/or trains do not come frequently enough
  - Personal security concerns
  - Health concerns
  - RTD services do not go to the places that my student/youth needs
  - Not listed here (please specify)

## Zero Fare for Youth Survey Analysis Report

23. How likely do you think your student are to use RTD services while they are free during Zero Fare for Youth?

- ☐ Not at all likely
- ☐ Not very likely
- ☐ Somewhat likely
- ☐ Very likely

24. Aside from using any RTD services, how does your student typically get to where they need to go?

- ☐ Personal/family vehicle as a driver or as a passenger
- ☐ A friend's vehicle as a passenger
- ☐ Bike/e-bike/scooter/etc.
- ☐ Walking
- ☐ Traditional taxi services
- ☐ Ride-share services (Uber, Lyft, etc.)
- ☐ School bus

25. Do you consider your student to have any disabilities (physical or mental impairments that substantially limits one of more major life activities)?

- ☐ Yes
- ☐ No

26. What language does your family speak most commonly in your home?

- ☐ English
- ☐ Spanish
- ☐ Vietnamese
- ☐ Chinese (Mandarin or Cantonese)
- ☐ Not listed here (please specify)

27. Which of the following best describes your student's ethnicity?

- ☐ Non-Hispanic/Latine
- ☐ Hispanic/Latine
- ☐ Prefer not to say

28. Which of the following best describes your student race? Please select all that apply.

- ☐ Native American, American Indian, or Alaskan Native
- ☐ Asian or Asian American
- ☐ Black or African American
- ☐ Native Hawaiian or other Pacific Islander
- ☐ Middle Eastern
- ☐ White
- ☐ Biracial/Multiracial
- ☐ Prefer not to say
- ☐ Not listed here (please specify)

## Zero Fare for Youth Survey Analysis Report

29. Which of the following best describes your student's gender identity?

- ☐ Male
- ☐ Female
- ☐ Non-binary
- ☐ Gender fluid
- ☐ Agender
- ☐ Prefer not to say
- ☐ Not listed here (please specify)

30. Which of the following best describes your household's annual income?

- ☐ Up to \$9,999
- ☐ Between \$10,000 and \$19,999
- ☐ Between \$20,000 and \$29,999
- ☐ Between \$30,000 and \$39,999
- ☐ Between \$40,000 and \$49,999
- ☐ Between \$50,000 and \$59,999
- ☐ Between \$60,000 and \$69,999
- ☐ Between \$70,000 and \$79,999
- ☐ Between \$80,000 and \$89,999
- ☐ Between \$90,000 and \$99,999
- ☐ \$100,000 and above

31. How many people live in your household?

- ☐ 1
- ☐ 2
- ☐ 3
- ☐ 4
- ☐ 5
- ☐ 6
- ☐ 7
- ☐ 8
- ☐ 9
- ☐ 10 or more

## Appendix B: Detailed Average Fare Analysis Tables

**Table B-1: Average Fare Analysis – Total**

Table B-1: Average Fare Analysis (Current)

Current Fare Structure								
Fare Payment Type	All Customers			Minority Customers			Low-Income Customers	
	Avg Fare per Boarding	Boardings		Avg Fare per Boarding	Minority Boardings		Avg Fare per Boarding	Low-Income Boardings
Full Fare, 3-Hour Pass	\$1.43	4,064,234		\$1.43	1,853,187		\$1.43	1,928,997
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$1.23	2,004,981		\$1.19	392,103		\$1.19	331,099
Full Fare, 10-Ride	\$1.55	1,043,144		\$1.54	428,836		\$1.53	347,560
Full Fare, Day Pass	\$1.94	6,668,035		\$1.50	3,025,714		\$1.38	2,424,610
Full Fare, Electronic Day Pass / Fare Capping	\$1.27	3,486,202		\$1.04	1,164,147		\$1.18	555,044
Full Fare, Monthly Pass/Cap	\$1.03	3,868,881		\$1.02	1,372,748		\$0.99	901,947
LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.40	124,683		\$0.40	60,735		\$0.40	107,603
LiVE, 10-Ride	\$0.75	4,104		\$0.75	1,999		\$0.75	3,541
LiVE, Electronic Day Pass / Fare Capping	\$0.23	190,086		\$0.23	92,593		\$0.23	164,046
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.39	15,544		\$0.39	8,036		n/a	-
Full Fare -> Expanded Live, 10-Ride	\$0.75	518		\$0.74	270		n/a	-
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Capping	\$0.22	23,102		\$0.21	11,771		n/a	-
Full Fare -> Expanded LiVE, Monthly Pass/Cap	\$0.30	17,291		\$0.30	8,884		n/a	-
Youth, 3-Hour Pass	\$0.41	1,157,628		\$0.41	530,072		\$0.41	544,022
Youth, Electronic 3-Hour Pass / Fare Capping	\$0.23	519,059		\$0.23	100,928		\$0.23	88,982
Youth, 10-Ride	\$0.47	293,738		\$0.47	125,506		\$0.47	105,517
Youth, Day Pass	\$0.28	977,338		\$0.28	542,966		\$0.28	463,609
Youth, Electronic Day Pass / Fare Capping	\$0.16	636,671		\$0.16	297,113		\$0.16	153,273
Youth, Monthly Pass/Cap	\$0.27	3,278,599		\$0.27	1,197,662		\$0.27	839,448
Senior/Disabled, 3-Hour Pass	\$0.65	1,380,298		\$0.65	544,688		\$0.65	717,243
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.37	376,103		\$0.36	141,879		\$0.36	187,049
Senior/Disabled, 10-Ride	\$0.74	513,507		\$0.74	156,459		\$0.74	237,795
Senior/Disabled, Day Pass	\$0.42	3,218,739		\$0.41	1,062,589		\$0.40	1,500,417
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.26	723,994		\$0.25	230,983		\$0.24	309,364
Senior/Disabled, Monthly Pass/Cap	\$0.28	3,850,899		\$0.28	1,223,565		\$0.27	2,383,216
Bulk Purchase	\$0.79	2,839,410		\$0.78	1,023,160		\$0.78	1,008,397
EcoPass (Business)	\$2.14	2,650,675		\$2.21	617,285		\$2.29	186,283
EcoPass (NECO)	\$1.85	175,506		\$1.82	25,821		\$1.78	47,580
CollegePass	\$2.11	714,662		\$2.09	267,352		\$2.08	321,626
Semester Pass	\$0.77	37,702		\$0.77	15,022		\$0.77	18,851
<b>Total, Total</b>	<b>\$1.05</b>	<b>44,855,331</b>		<b>\$0.97</b>	<b>16,524,071</b>		<b>\$0.84</b>	<b>15,877,120</b>

Table B-1: Average Fare Analysis (Proposed)

Proposed Fare Structure								
Fare Payment Type	All Customers			Minority Customers			Low-Income Customers	
	Avg Fare per Boarding	Boardings		Avg Fare per Boarding	Minority Boardings		Avg Fare per Boarding	Low-Income Boardings
Full Fare, 3-Hour Pass	\$1.43	4,064,234		\$1.43	1,853,187		\$1.43	1,928,997
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$1.23	2,004,981		\$1.19	392,103		\$1.19	331,099
Full Fare, 10-Ride	\$1.55	1,043,144		\$1.54	428,836		\$1.53	347,560
Full Fare, Day Pass	\$1.94	6,668,035		\$1.50	3,025,714		\$1.38	2,424,610
Full Fare, Electronic Day Pass / Fare Capping	\$1.27	3,486,202		\$1.04	1,164,147		\$1.18	555,044
Full Fare, Monthly Pass/Cap	\$1.03	3,868,881		\$1.02	1,372,748		\$0.99	901,947
LIVE, Electronic 3-Hour Pass / Fare Capping	\$0.40	124,683		\$0.40	60,735		\$0.40	107,603
LIVE, 10-Ride	\$0.75	4,104		\$0.75	1,999		\$0.75	3,541
LIVE, Electronic Day Pass / Fare Capping	\$0.23	190,086		\$0.23	92,593		\$0.23	164,046
Full Fare -> Expanded LIVE, Electronic 3-Hour Pass / Fare Capping	\$0.39	15,544		\$0.39	8,036		n/a	-
Full Fare -> Expanded Live, 10-Ride	\$0.75	518		\$0.74	270		n/a	-
Full Fare -> Expanded LIVE, Electronic Day Pass / Fare Capping	\$0.22	23,102		\$0.21	11,771		n/a	-
Full Fare -> Expanded LIVE, Monthly Pass/Cap	\$0.30	17,291		\$0.30	8,884		n/a	-
Youth, 3-Hour Pass	\$0.00	1,157,628		\$0.00	530,072		\$0.00	544,022
Youth, Electronic 3-Hour Pass / Fare Capping	\$0.00	519,059		\$0.00	100,928		\$0.00	88,982
Youth, 10-Ride	\$0.00	293,738		\$0.00	125,506		\$0.00	105,517
Youth, Day Pass	\$0.00	977,338		\$0.00	542,966		\$0.00	463,609
Youth, Electronic Day Pass / Fare Capping	\$0.00	636,671		\$0.00	297,113		\$0.00	153,273
Youth, Monthly Pass/Cap	\$0.00	3,278,599		\$0.00	1,197,662		\$0.00	839,448
Senior/Disabled, 3-Hour Pass	\$0.65	1,380,298		\$0.65	544,688		\$0.65	717,243
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.37	376,103		\$0.36	141,879		\$0.36	187,049
Senior/Disabled, 10-Ride	\$0.74	513,507		\$0.74	156,459		\$0.74	237,795
Senior/Disabled, Day Pass	\$0.42	3,218,739		\$0.41	1,062,589		\$0.40	1,500,417
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.26	723,994		\$0.25	230,983		\$0.24	309,364
Senior/Disabled, Monthly Pass/Cap	\$0.28	3,850,899		\$0.28	1,223,565		\$0.27	2,383,216
Bulk Purchase	\$0.79	2,839,410		\$0.78	1,023,160		\$0.78	1,008,397
EcoPass (Business)	\$2.14	2,650,675		\$2.21	617,285		\$2.29	186,283
EcoPass (NECO)	\$1.85	175,506		\$1.82	25,821		\$1.78	47,580
CollegePass	\$2.11	714,662		\$2.09	267,352		\$2.08	321,626
Semester Pass	\$0.77	37,702		\$0.77	15,022		\$0.77	18,851
<b>Total, Total</b>	<b>\$1.01</b>	<b>44,855,331</b>		<b>\$0.92</b>	<b>16,524,071</b>		<b>\$0.80</b>	<b>15,877,120</b>



Table B-1: Average Fare Analysis (Change in Average Fare Per Boarding)

Change in Average Fare Per Boarding														
Fare Payment Type	All Customers				Minority Customers					Low-Income Customers				
	Change in Avg Fare per Boarding	% Change	Boardings	% of All Customer Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Minority Boardings	% of All Minority Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Low-Income Boardings	% of All Low-Income Boardings
Full Fare, 3-Hour Pass	\$0.00	0.0%	4,064,234	9.1%	\$0.00	0.0%	0.0%	1,853,187	11.2%	\$0.00	0.0%	0.0%	1,928,997	12.1%
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$0.00	0.0%	2,004,981	4.5%	\$0.00	0.0%	0.0%	392,103	2.4%	\$0.00	0.0%	0.0%	331,099	2.1%
Full Fare, 10-Ride	\$0.00	0.0%	1,043,144	2.3%	\$0.00	0.0%	0.0%	428,836	2.6%	\$0.00	0.0%	0.0%	347,560	2.2%
Full Fare, Day Pass	\$0.00	0.0%	6,668,035	14.9%	\$0.00	0.0%	0.0%	3,025,714	18.3%	\$0.00	0.0%	0.0%	2,424,610	15.3%
Full Fare, Electronic Day Pass / Fare Capping	\$0.00	0.0%	3,486,202	7.8%	\$0.00	0.0%	0.0%	1,164,147	7.0%	\$0.00	0.0%	0.0%	555,044	3.5%
Full Fare, Monthly Pass/Cap	\$0.00	0.0%	3,868,881	8.6%	\$0.00	0.0%	0.0%	1,372,748	8.3%	\$0.00	0.0%	0.0%	901,947	5.7%
LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.00	0.0%	124,683	0.3%	\$0.00	0.0%	0.0%	60,735	0.4%	\$0.00	0.0%	0.0%	107,603	0.7%
LiVE, 10-Ride	\$0.00	0.0%	4,104	0.0%	\$0.00	0.0%	0.0%	1,999	0.0%	\$0.00	0.0%	0.0%	3,541	0.0%
LiVE, Electronic Day Pass / Fare Capping	\$0.00	0.0%	190,086	0.4%	\$0.00	0.0%	0.0%	92,593	0.6%	\$0.00	0.0%	0.0%	164,046	1.0%
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.00	0.0%	15,544	0.0%	\$0.00	0.0%	0.0%	8,036	0.0%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded Live, 10-Ride	\$0.00	0.0%	518	0.0%	\$0.00	0.0%	0.0%	270	0.0%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Capping	\$0.00	0.0%	23,102	0.1%	\$0.00	0.0%	0.0%	11,771	0.1%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LiVE, Monthly Pass/Cap	\$0.00	0.0%	17,291	0.0%	\$0.00	0.0%	0.0%	8,884	0.1%	n/a	n/a	n/a	-	0.0%
Youth, 3-Hour Pass	-\$0.41	-100.0%	1,157,628	2.6%	-\$0.41	-100.0%	0.0%	530,072	3.2%	-\$0.41	-100.0%	0.0%	544,022	3.4%
Youth, Electronic 3-Hour Pass / Fare Capping	-\$0.23	-100.0%	519,059	1.2%	-\$0.23	-100.0%	0.0%	100,928	0.6%	-\$0.23	-100.0%	0.0%	88,982	0.6%
Youth, 10-Ride	-\$0.47	-100.0%	293,738	0.7%	-\$0.47	-100.0%	0.0%	125,506	0.8%	-\$0.47	-100.0%	0.0%	105,517	0.7%
Youth, Day Pass	-\$0.28	-100.0%	977,338	2.2%	-\$0.28	-100.0%	0.0%	542,966	3.3%	-\$0.28	-100.0%	0.0%	463,609	2.9%
Youth, Electronic Day Pass / Fare Capping	-\$0.16	-100.0%	636,671	1.4%	-\$0.16	-100.0%	0.0%	297,113	1.8%	-\$0.16	-100.0%	0.0%	153,273	1.0%
Youth, Monthly Pass/Cap	-\$0.27	-100.0%	3,278,599	7.3%	-\$0.27	-100.0%	0.0%	1,197,662	7.2%	-\$0.27	-100.0%	0.0%	839,448	5.3%
Senior/Disabled, 3-Hour Pass	\$0.00	0.0%	1,380,298	3.1%	\$0.00	0.0%	0.0%	544,688	3.3%	\$0.00	0.0%	0.0%	717,243	4.5%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.00	0.0%	376,103	0.8%	\$0.00	0.0%	0.0%	141,879	0.9%	\$0.00	0.0%	0.0%	187,049	1.2%
Senior/Disabled, 10-Ride	\$0.00	0.0%	513,507	1.1%	\$0.00	0.0%	0.0%	156,459	0.9%	\$0.00	0.0%	0.0%	237,795	1.5%
Senior/Disabled, Day Pass	\$0.00	0.0%	3,218,739	7.2%	\$0.00	0.0%	0.0%	1,062,589	6.4%	\$0.00	0.0%	0.0%	1,500,417	9.5%
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.00	0.0%	723,994	1.6%	\$0.00	0.0%	0.0%	230,983	1.4%	\$0.00	0.0%	0.0%	309,364	1.9%
Senior/Disabled, Monthly Pass/Cap	\$0.00	0.0%	3,850,899	8.6%	\$0.00	0.0%	0.0%	1,223,565	7.4%	\$0.00	0.0%	0.0%	2,383,216	15.0%
Bulk Purchase	\$0.00	0.0%	2,839,410	6.3%	\$0.00	0.0%	0.0%	1,023,160	6.2%	\$0.00	0.0%	0.0%	1,008,397	6.4%
EcoPass (Business)	\$0.00	0.0%	2,650,675	5.9%	\$0.00	0.0%	0.0%	617,285	3.7%	\$0.00	0.0%	0.0%	186,283	1.2%
EcoPass (NECO)	\$0.00	0.0%	175,506	0.4%	\$0.00	0.0%	0.0%	25,821	0.2%	\$0.00	0.0%	0.0%	47,580	0.3%
CollegePass	\$0.00	0.0%	714,662	1.6%	\$0.00	0.0%	0.0%	267,352	1.6%	\$0.00	0.0%	0.0%	321,626	2.0%
Semester Pass	\$0.00	0.0%	37,702	0.1%	\$0.00	0.0%	0.0%	15,022	0.1%	\$0.00	0.0%	0.0%	18,851	0.1%
<b>Total</b>	<b>-\$0.04</b>	<b>-4.2%</b>	<b>44,855,331</b>	<b>100%</b>	<b>-\$0.05</b>	<b>-5.2%</b>	<b>-0.9%</b>	<b>16,524,071</b>	<b>100%</b>	<b>-\$0.04</b>	<b>-5.1%</b>	<b>-0.8%</b>	<b>15,877,120</b>	<b>100%</b>



We Make Lives Better  
Through Connections.

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January 27, 2025

# Zero Fare for Youth Program Continuation and Title VI Fare Equity Analysis

Doug MacLeod  
Chief Financial Officer

Carl Green Jr.  
Director, Civil Rights

Monika Treipl-Harnke  
Senior Manager, Revenue

# Outline

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- § Background
- § Final Title VI Fare Equity Analysis Findings
- § Outreach Activities and Feedback
- § Final Recommendation Summary
- § Youth Ridership and Foregone Fare Revenue
- § Implementation and Funding Analysis
- § Next Steps



# Background

# Zero Fare for Youth Background

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- May 14, 2024: Finance and Planning Committee
  - Staff presented draft Title VI fare equity analysis and mid-year program evaluation
- June 11, 2024: Finance and Planning Committee
  - Staff presented results of 12-month pilot and financial impact





# Final Fare Equity Analysis Results

# Final Fare Equity Analysis Results

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- § Meets FTA requirement for proposed fare change
- § No disparate impact on minority customers
- § No disproportionate burden on low-income customers
- § Average fare paid by minority and low-income customers remains lower than the systemwide average fare







# Community Outreach Activities and Feedback

# Outreach and Engagement

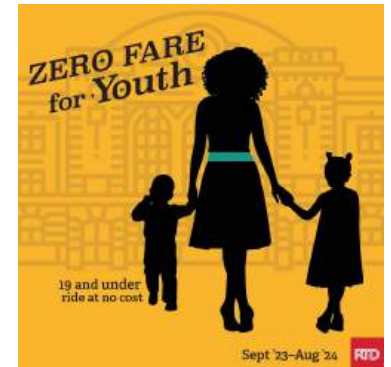
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§ Efforts took place between June 3, 2023, and June 29, 2024

- Six in-person and virtual public hearings in English and Spanish
- Partnerships formed with youth-serving organizations, recreation centers, and libraries
- Participated in 80+ community events and RTD pop-up events

§ Comprehensive marketing and outreach strategy

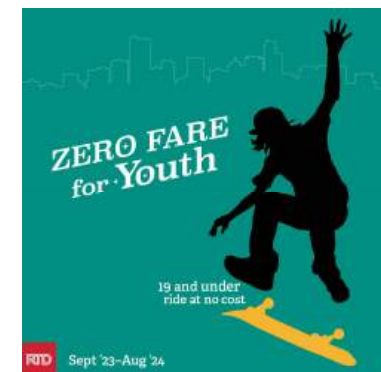
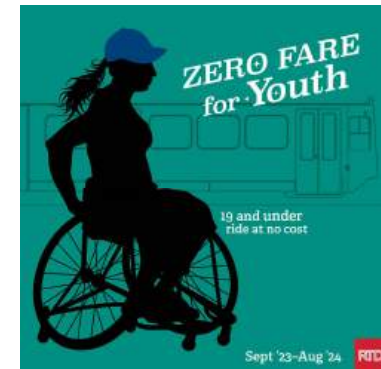
- Digital and social media with creative assets
- Dedicated webpage and downloadable toolkits for community partners
- In-system promotional assets
- Public relations
- Paid media



# Outreach Feedback Themes

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- § Public comments demonstrate immense support for the proposed fare change
- § Supports access to school, work and recreation/social activities
- § Benefits families who cannot afford fares for multiple children
- § Meets climate goals by encouraging youth ridership
- § Provides youth with independence
- § Encourages lifelong transit use
- § Saves money on gas by not having to use a car





# Final Recommendation

# Final Recommendation Summary

- § No-cost transit for youth ages 19 and younger
- September 2024 – August 2025

**Pilot Fare Structure**  
(Zero Fare for Youth, ages 19 and younger)

	ANY DESTINATION IN THE RTD SERVICE AREA
3-HOUR	\$0
DAY	
MONTHLY	

\*Children under six years of age currently ride for zero fare with a fare-paying adult  
\*\*Applies to Paratransit eligible customers

**Fare Structure without ZFY**  
(ages 6-19)

YOUTH FARE	
3-HOUR	\$0.85
DAY	\$1.70
MONTHLY	\$27.00

\*70 percent fare discount

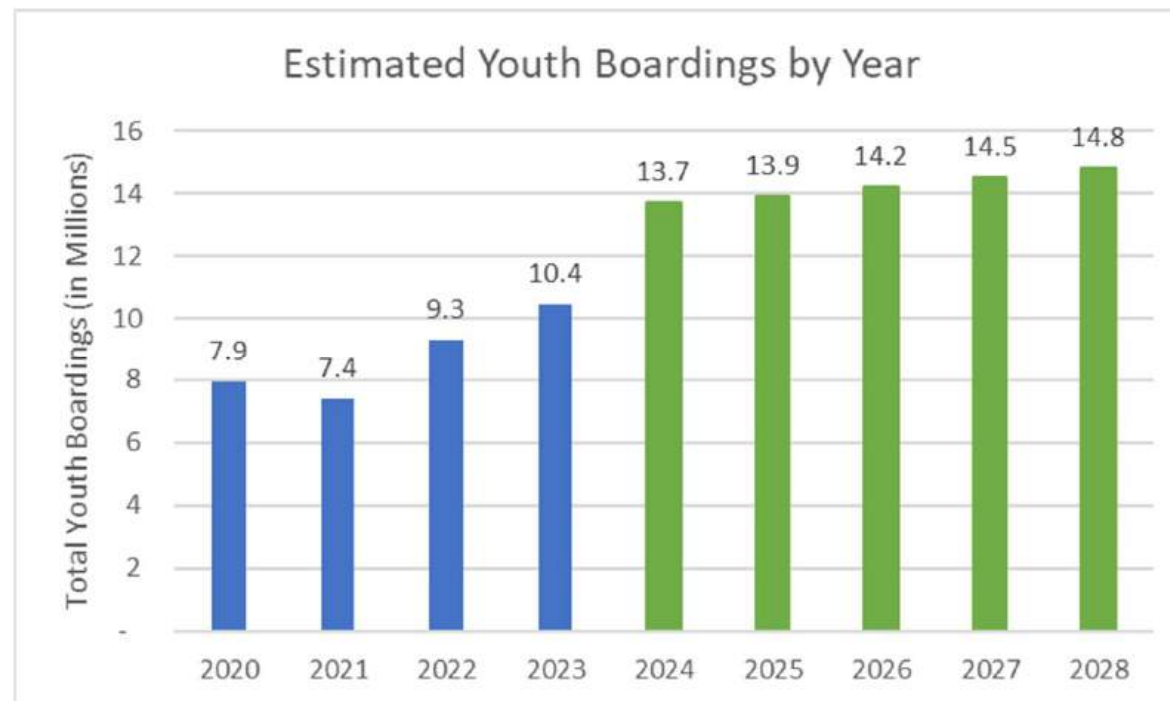




# Projected Youth Ridership and Fare Revenue Impacts

# Projected Youth Ridership Data

- 36% average monthly youth boardings increase



January 27, 2025



# Youth Forgone Revenue Data

- \$2.9 million (estimated)



January 27, 2025



# Implementation and Funding Analysis

# Implementation and Funding Analysis

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- 2025 estimated financial impact
  - \$2.9 million forgone youth fare revenue
  - \$410,000 estimated for marketing, language assistance, surveys and annual report
- Senate Bill 24-032, Methods to Increase the Use of Transit
  - \$5 million in grant funding available for one year
  - Colorado Energy Office grant applications July 2024
  - Future funding subject to future state appropriations





# Next Steps

# Next Steps

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§ July 23, 2024, Finance and Planning Committee

- ZFY Title VI Fare Equity Analysis Recommended Action Item
- ZFY Program Continuation Recommended Action Item

§ July 30, 2024, Board Meeting – final consideration (if approved in committee)

- ZFY Title VI Fare Equity Analysis Recommended Action Item
- ZFY Program Continuation Recommended Action Item

# We Make Lives Better Through Connections.

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[rtd-denver.com](http://rtd-denver.com)



# **RTD 2025-2028 Title VI Program**

## **Attachment Q: May 2024 Service Equity Analysis**

DRAFT



# BOARD OF DIRECTORS REPORT

## May 2024 Title VI Service Equity Analysis

Committee Meeting Date: March 13, 2024
Board Meeting Date: March 26, 2024

### RECOMMENDED ACTION

For the Board of Directors (Board) to adopt the Title VI Service Equity Analysis report for May 2024 service changes to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964.

### STAFF REPRESENTATIVE

Carl Green Jr., Director, Civil Rights Division  
Martin Romero, Transit Equity Manager, Civil Rights Division  
Jessie Carter II, Senior Manager, Service Planning and Scheduling Division

### PRESENTATION LENGTH

15 minutes

### BACKGROUND

The 37 service changes proposed for May 2024 facilitate opportunities for bus and rail operators to select new work assignments and for the Service Development Division to adjust the overall operations plan for the agency’s transit network. Additionally, with the Board’s adoption of the Reimagine RTD System Optimization Plan (SOP), several of the service change proposals reflect the first phases of SOP implementation to provide the best possible value to customers.

The Board-adopted guidance for proposed service changes continues to be:

- Service performance evaluation based on service standards
- Maintaining the overall integrity of the transit network and on transit dependent markets
- Making alternative services available to affected customers
- Cost-effective distribution throughout the District and Family of Services and the ability to enhance service when possible
- Compliance with Title VI of the Civil Rights Act of 1964: benefits and services are provided without regard to race, color or national origin; also, disparate effects on low-income and minority populations
- Response to changes in the communities where services are provided

### Service Equity Analysis Requirements of Title VI of the Civil Rights Act

The Federal Transit Administration’s (FTA) Circular 4702.1B provides its recipients of 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. The May 2024 service change proposal includes two major service changes out of 37 total changes. Thus, an analysis is required to be brought before the Board for its consideration. The complete Title VI Service Equity Analysis report is included in Attachment A.

## Title VI Service 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 the foundational requirements for evaluating service change proposals for equity. These policies and their applicable thresholds are listed below:

**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 12 or more months. All major service changes will be subject to an equity analysis.

### Title VI Policies:

**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.

**Disproportionate Burden Policy:** 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.

## DISCUSSION

Staff proposes changes to 31 bus routes and six rail lines in the forthcoming May 2024 service change. Of these 37 changes, two services have proposed additions or reductions to service 25 percent greater than that of baseline service and thus meet established thresholds for a major service change. Those routes are shown in bold in the following table.

Reinstated Service	Free MetroRide
<b>Modified Services (29 services)</b> <i>(Additional trips, expanded service spans)</i>	0L, 8, 11, 12, 20, 24, 37, 45, 65, 73, 83D/L, 105, 120W/E, 120L, 121, 169, 169L, 225, 228, DASH, FF1, GS, JUMP, NB, Platte Valley FlexRide, Evergreen FlexRide, N Line
<b>Reduced Service (6 services)</b>	<b>Free MallRide, RX,</b> D Line, E Line, H Line, R Line
<b>Temporary Suspended Service</b>	L Line

Methodology: Disparate impact and disproportionate burden analyses were performed at the route/line level and system level to identify any potential disparities in service changes based on race/ethnicity or income.

Summary of Findings:

- Potential disparate impacts and disproportionate burdens were identified at the individual route level: of the two routes/lines that had major service changes, one route (the Free MetroRide) had a potential disparate impact finding and one route (the Free MallRide) had a disproportionate burden finding.
- The proposed major service changes were examined in aggregate, at the system level, to determine overall impacts to equity (i.e., minority and low-income) populations compared to non-equity (i.e., non-minority and non-low-income) populations.
  - At the system level, service decrease on the Free MallRide stands to impact minority populations less than non-minority populations (0.39% vs. 0.82%, respectively). The difference does not surpass the disparate impact threshold of 0.90%. Therefore, no systemwide level disparate impact finding is found with the proposed major service decrease. However, low-income populations stand to be impacted more than non-low-income populations (1.07% vs. 0.59%, respectively). The difference exceeds the 10% disproportionate burden threshold of 0.65%. Therefore, **a system level disproportionate burden is found with the proposed major service decrease.**
  - At the system level, reinstatement of the Free MetroRide stands to benefit minority populations less than non-minority populations (0.20% vs. 0.24%, respectively). This difference meets the disparate impact threshold of 0.21%. Therefore, **a system level disparate impact finding is found with the proposed major service increase.** Conversely, low-income populations stand to benefit more than non-low-income populations (0.47% vs. 0.19%, respectively). The difference is above the 10% disproportionate burden threshold of 0.17%. Therefore, no system level disproportionate burden is found with the proposed major service increase.

Conclusion:

Although the two major service changes resulted in a potential disparate impact and a disproportionate burden at both the route and system level, RTD recommends keeping the May 2024 service plan as proposed as there are no practical alternatives to avoid, minimize or mitigate the disparate impact (Free MetroRide) and disproportionate burden (Free MallRide). The substantial legitimate justification for the Free MallRide service reduction is evident as this change is due to ongoing construction on the 16th Street Mall and the Near-Term Downtown Rail Reconstruction Project. Moreover, the Free MetroRide service increase will be utilized as a mitigation measure (i.e., providing customers with alternative connection between Denver Union Station and the Central Business District) due to the downtown rail reconstruction project, providing the substantial legitimate justification for the reinstatement.

In adopting this report, the agency seeks to meet the 2021-2026 Strategic Plan priority of Community Value while maintaining compliance with Title VI federal regulations. RTD will continue to assess the equity implications for all subsequent service change proposals and will propose adjustments and service alternatives as appropriate in future service change recommendations.

## FINANCIAL IMPACT

The adoption of the Title VI Service Equity Analysis will not result in any direct or foreseeable financial impacts.

## ATTACHMENTS:

- Title VI Service Equity Analysis Report for May 2024 Runboard Proposal(PDF)
- May 2024 Service Equity Analysis Presentation (PPTX)

<b>RESULT:</b>	<b>PASSED [13 TO 2]</b>
<b>MOVER:</b>	Vince Buzek, Director, District J
<b>SECONDER:</b>	Marjorie Sloan, Director, District M
<b>AYES:</b>	Bouquet, Broom, Buzek, Catlin, Davidson, Dishell, Guissinger, Harwick, Lewis, Rosenthal, Sloan, Tisdale, Whitmore
<b>NAYS:</b>	Michael Guzman, JoyAnn Ruscha

Prepared by:

Dani McLean, Transit Equity Specialist

Annette Hunter, Transit Equity Specialist

Approved by:



Michael Ford, Chief Operations Officer 3/7/2024

Authorized by:



Debra A. Johnson, General Manager and CEO 3/8/2024

# **Title VI Service Equity Analysis Report**

**May 2024 Service Changes**

# Service Equity Analysis: May 2024

## Contents

Executive Summary.....	2
<i>Methodology</i> .....	2
<i>Major Service Changes</i> .....	2
<i>Findings</i> .....	2
Introduction.....	3
<i>Title VI and Environmental Justice</i> .....	3
<i>Service Change Philosophy</i> .....	3
<i>RTD's Title VI Equity Analysis Policies</i> .....	4
Analysis.....	5
<i>Data Sources and Methodology</i> .....	5
<i>Public Outreach Overview</i> .....	6
<i>Major Service Change, Disparate Impact and Disproportionate Burden Analysis</i> .....	6
Changes by Transit Mode .....	7
<i>Major Service Change Review</i> .....	7
Major Service Change Reductions .....	7
Major Service Change Increases .....	7
Route- and Line-Level Analysis .....	7
Systemwide Analysis .....	10
Summary of Findings .....	17
Appendix A: Systemwide Service Changes	
Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores	

# Service Equity Analysis: May 2024

## Executive Summary

This document summarizes the analysis of major service changes proposed for the **May 2024** runboards to ensure that the changes will not inequitably impact 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 proposes changes to 31 bus route/patterns and six rail lines of RTD’s forthcoming **May 2024** runboard. Of these 37 changes, two services meet established thresholds for a major service change. Although meeting the threshold of 25% for a major service change, the suspension of the L Line during downtown rail reconstruction project will be a temporary change in service during the **May 2024** runboard and will be reinstated in September 2024; this proposed service change falls below the threshold of major service changes based on timeline of the change. The routes tabulated below have proposed adjustments to service that were greater than 25% of baseline service and will remain in effect for 12 or more months.

<b>Service Adjustments (1 service)</b>	<b>Free MallRide:</b> Reduce service to 10-minute headways
<b>Service Reinstatement (1 service)</b>	<b>Free MetroRide:</b> Reinstatement in accordance with System Optimization Plan and to provide alternate services during downtown rail reconstruction project

### Findings

Major service changes included in the proposed **May 2024** service changes include a reduction of service on the Free MallRide and reinstatement of the Free MetroRide previously suspended in April 2020. These routes both serve high concentrations of low-income populations in central Denver.

When considering the demographics within the service area (within a quarter mile) of a major service increase and as a proportion to the District overall, low-income populations received a greater increase in service (i.e., were more positively impacted) compared to non-low-income populations. Low-income areas received 0.28% more of a benefit than non-low-income areas. However, minority areas received less of an increase in service (i.e., were less positively impacted) compared to non-minority populations. Minority areas benefitted 0.01% less than non-minority areas. For population within the service area impacted by a service decrease, low-income areas were impacted more than non-low-income areas. Low-income areas were negatively impacted 0.48% more than non-low-income areas. Conversely, minority areas were less impacted than non-minority areas, receiving 0.43% less of an impact from service decreases compared to non-minority areas.

Finally, a potential disparate impact and a potential disproportionate burden were identified at the individual route-level: the Free MallRide had a potential disproportionate burden finding and the Free MetroRide had a potential disparate impact finding.



# **Service Equity Analysis: May 2024**

## **Introduction**

### **Title VI and Environmental Justice**

Equity is a core principle of RTD’s functional mission to provide mass 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 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 current and proposed runboards. Routes with major service changes include one major increase and one reinstatement of a formerly suspended route pattern. These changes and all others have been reviewed individually at the route/line 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/lines, the elimination of existing routes/lines and changes to the alignment and trip frequency within existing routes/lines. RTD has established principles to identify the service changes needed to meet the diverse travel needs of those within the District and maintain a high-performance, sustainable transit system.

# Service Equity Analysis: May 2024

## RTD Service Changes Guiding Principles

- Service performance evaluation based on 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
- Compliance with 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
- 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 agency'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 agency 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.

*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% addition or reduction in the service hours of any route that would remain in effect for 12 or more months. All major service changes will be subject to an equity analysis that includes an analysis of adverse effects.

# Service Equity Analysis: May 2024

- 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 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% 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 150% 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 and Methodology

Demographic data used for this analysis comes from the Census Bureau's American Community Survey (ACS) 5-Year Estimates for years 2018 to 2022 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 **May 2024** 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/line's quarter-mile service area. These proportional differences were compared against district population proportions of equity populations and route/line 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 three. 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 district boundaries.

Route/line 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 block group-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).

# Service Equity Analysis: May 2024

RTD calculated the net change in service hours for each route/line 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

Three public meetings were conducted March 6-7, 2024. The comments collected on service changes during these meetings are summarized in the table below. In addition to the general outreach, the Transit Equity Office reached out to 97 key public activity centers surrounding the routes/lines to inform them of the proposed major service changes, how to provide feedback and encourage community members to attend the open houses. Table 1 captures the meeting locations, dates, number of attendees and the common themes of attendees' comments pertaining to the two major service changes described in this analysis.

Table 1. Public meeting details

Date and Time   Location	Comment Themes	Number of Attendees
March 6 at 12 p.m.   Virtual	No comments on the major service changes	17
March 6 at 5:30 p.m.   1660 Blake St, Denver, CO, 80202	Comment indicating satisfaction of the Free MetroRide being reinstated	12
March 7 at 12 p.m.   Virtual	Comment inquiring permanence of the Free MetroRide following construction	10
		Total – 39

The public was also notified of the ability to submit comments to [service.changes@rtd-denver.com](mailto:service.changes@rtd-denver.com), by phone at 303-299-2004 and by fax 303-299-2227.

## Major Service Change, Disparate Impact and Disproportionate Burden Analysis

Proposed service changes for the **May 2024** runboard that resulted in a 25% or greater change in service were categorized by equity population (minority or non-minority, low-income or non-low-income) for comparison. Routes were categorized as either equity or non-equity based on their identification within the prior (current) network using 2018-2022 ACS five-year demographic data.

A comparative, proportional equity analysis was completed to review the routes/lines individually. This analysis identified the equity and non-equity populations within a route/line service area and compared those against the equity and non-equity populations of the District. If impacted equity populations within the route/line service area received 10% or greater impacts compared to non-equity populations, the route/line 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

# Service Equity Analysis: May 2024

## Changes by Transit Mode

For the **May 2024** runboard, 31 bus routes will undergo various service changes. Of these, 5 routes will see combined increases in **bus service of over 56 total weekday revenue service hours and 62 additional weekend service hours**. While cancelling each other out, the decrease in service on the Free MallRide with reinvestment of its resources into reinstating the previously suspended Free Metro Ride service both exceed the major service change threshold. The reduction on the Free MallRide allows for 90 new weekday revenue service hours for the Free MetroRide, providing another option between Denver Union Station and Civic Center Station.

*Table 2. Summary of service changes by transit mode*

Mode	Change in Weekday Daily Hours
All Bus	+55
All Rail	0
Overall	+55

## 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/lines prior to individual review of routes/lines, route/line block groups and overall network levels; equity grouping comparison occurred at every level. Major service changes are categorized as the following:

- **Major Service Reductions** (a service reduction of 25% or more)
- **Major Service Increases** (service increases of 25% or more related to new or restructured service)

### Major Service Change Reductions

The Free MallRide is proposed to have reduced service in light of continuing construction work on the downtown 16<sup>th</sup> Street Mall and in anticipation of the downtown rail reconstruction project. The service hours reduced on the Free MallRide are proposed to be reinvested to reinstate the Free MetroRide.

The L Line is proposed to be temporarily suspended due to Near-Term Downtown Rail Reconstruction Project during the **May 2024** runboard but will be reinstated prior to the September 2024 runboard.

### Major Service Change Increases

One bus route had a proposed major service increase which includes service increases of 25% or greater. The reinstatement of the Free MetroRide is proposed for the **May 2024** runboard to mitigate impacts of the downtown rail reconstruction project and provide additional service through downtown.

### Route- and Line-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/line individually to determine potential Disparate Impacts (DI) and/or Disproportionate Burdens (DB). 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.

# Service Equity Analysis: May 2024

## Disparate Impact and Disproportionate Burden Analysis

For each route/line with a major service change, determine the percent of the route's/line'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 DI or DB findings. For service increases, the following analysis examines the extent to which the benefits of the improvements are inclusive of minority and low-income populations. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, food and social services for minority and low-income populations.

### Free MallRide

*Proposal: Due to ongoing construction work on the 16<sup>th</sup> Street Mall and in anticipation of downtown rail reconstruction project, it is proposed to reduce frequencies on the Free MallRide to 10-minute headways from every 5 minutes. This change will free up operator resources to reinstate Free MetroRide service, the reinstatement of which will also help mitigate impacts of the rail reconstruction project.*

As shown in **Table 3**, a higher percentage of the District's low-income population stands to be impacted by the proposed major service decrease as compared to non-low-income population (0.75% vs. 0.43%, respectively). This difference exceeds the 10% disproportionate burden threshold (0.47%). Therefore, a potential route-level disproportionate burden is found requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis). However, a lower percentage of the District's minority population is impacted from the proposed major service decrease as compared to the non-minority population (0.36% vs. 0.56%, respectively). This difference falls below the 10% disparate impact threshold (0.62%). Thus, there is no disparate impact found at the route level.

Table 3. Free Mall Ride Disparate Impact and Disproportionate Burden Analysis

Route MALL - Free MallRide				
January 2024 to May 2024 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>10,741</b>	<b>4,098</b>	<b>11,163</b>	<b>3,238</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	99.44%	99.64%	99.57%	99.25%
<b>% District Impacted</b>	<b>0.56%</b>	<b>0.36%</b>	<b>0.43%</b>	<b>0.75%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
DI & DB Thresholds Are 90% for service increases and 110% for service decreases of % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	<b>0.62%</b>	<b>0.36%</b>	<b>0.47%</b>	<b>0.75%</b>

# Service Equity Analysis: May 2024

The reduction of service on the Free MallRide would limit access to:

- About 114,800 jobs
  - 18% low-to-medium wage jobs, which is below the RTD District average (45%)
  - 13% jobs held by minorities, which is below the RTD District average (14%)
  - 14% jobs held by Hispanic/Latino workers, which is below the RTD District average (18%)
- 169 retail/convenience stores
- 40 human and social services centers
- 2 senior housing and facilities
- 11 colleges, high schools, middle schools and elementary schools

## Free MetroRide

*Proposal: In accordance with the System Optimization Plan, ongoing 16th Mall construction and in anticipation of downtown rail reconstruction project, reinstatement of the Free MetroRide service is recommended to give customers alternative connection between Denver Union Station and the Central Business District.*

As shown in **Table 4**, a higher percentage of the District's low-income population stands to benefit from the proposed major service increase as compared to non-low-income population (0.81% vs. 0.50%, respectively). This difference does not meet the 10% disproportionate burden threshold (0.45%). Therefore, no potential route-level disproportionate burden is found. However, a lower percentage of the District's minority population stands to benefit from the proposed major service increase as compared to the non-minority population (0.44% vs. 0.60%, respectively). This difference exceeds the 10% disparate impact threshold of 0.54%. Thus, a potential disparate impact is found at the route level requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis).

Table 4. Free MetroRide Disparate Impact and Disproportionate Burden Analysis

Route METRORIDE - Free MetroRide				
January 2024 to May 2024 Service Change Analysis				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>11,449</b>	<b>5,019</b>	<b>12,908</b>	<b>3,472</b>
District Statistics	1,915,350	1,149,204	2,590,598	430,356
District Total Base Population	3,064,553		3,020,954	
% of District Not Impacted	99.40%	99.56%	99.50%	99.19%
<b>% District Impacted</b>	<b>0.60%</b>	<b>0.44%</b>	<b>0.50%</b>	<b>0.81%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
DI & DB Thresholds Are 90% for service increases and 110% for service decreases of % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	<b>0.54%</b>	<b>0.44%</b>	<b>0.45%</b>	<b>0.81%</b>

The reinstatement of service on the Free MetroRide would expand access to:

- About 116,140 jobs
  - 18% low-to-medium wage jobs, which is below the RTD District average (45%)
  - 13% jobs held by minorities, which is below the RTD District average (14%)



# Service Equity Analysis: May 2024

- 14% jobs held by Hispanic/Latino workers, which is below the RTD District average (18%)
- 170 retail/convenience stores
- 47 human and social services centers
- 2 senior housing and facilities
- 10 colleges, high schools, middle schools and elementary schools

## Systemwide Analysis

In accordance with RTD's 2022 Title VI Program Update, a systemwide analysis is required in addition to route- and line-level analyses. A system level analysis provides further understanding of changes to service levels for Title VI protected populations at aggregate levels.

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, bus service increases by over 55 weekday revenue hours
- Of the over 31,000 people served by stops within the service area with major service changes, low-income populations represented a higher share of population than District averages. Of this total, nearly 8,500 low-income people would receive service improvements
- At the systemwide level, equity routes and non-equity routes<sup>1</sup> were compared only for those with major service changes. The two bus routes with major service changes both serve above-average low-income populations and are classified as low-income routes

**In review of the Free MallRide and Free MetroRide at the systemwide level, there are potential disproportionate burden and disparate impact findings, respectively.**

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 2024** to **May 2024** 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 on-low-income and non-minority block groups are referred to as "non-equity" block groups.

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<sup>1</sup> Based on existence of the route within the January 2024 network and the population within a quarter mile of bus stops or rail stations. 2018-2022 5-Year ACS estimates were used for population identification.

# Service Equity Analysis: May 2024

## Network Analysis Process

Determine block groups at/above district averages for low-income population (14.2%) and minority population (37.5%).

Determine which block groups experienced service changes of 25% or more.

Of block groups with a major service change, compare the difference in population for equity versus non-equity block groups; if the difference is more than 10%, review for potential adverse impacts.

There are 2,197 block groups defined as being wholly within or mostly within the District.<sup>2</sup> Using the 2018-2022 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 37.5% was derived by using the base population of the service area (3.064 million), the low-income population percentage of 14.2% is derived from a slightly smaller population figure (3.02 million). This is due to the smaller population whose poverty status the Census Bureau can determine.<sup>3</sup> The thresholds summarized in **Table 5** yielded 824 (37.5% of all) block groups above the district average for low-income population, and 846 (38.5%) block groups above the district average for minority population.

Table 6. District averages; NTD 2023; ACS 2018-2022 5-year estimates

Service Area (sq. mi.)	Total Block Groups	Total Population	Percent Minority	Total Population (assessed)	Percent Low-Income
2,342	2,197	3,064,553	37.5%	3,020,954	14.2%

The proposed major service changes were examined in aggregate by transit mode to determine overall impacts to underlying population. **Table 5** summarizes the change in service for block group population underlying the bus stops with proposed major service decreases proportionally compared to population in the District, while **Table 6** summarizes impacted block group population for major service increases. These comparisons review the equity composition of those who may be impacted by proposed service changes compared to the overall equity composition of the District overall. No major service changes (longer than 12 months) were proposed for rail services with the **May 2024** runboard.

<sup>2</sup> Some block groups are not completely contained within district boundaries due to differences in boundaries between the District and Census-defined geographies.

<sup>3</sup> The total population whose poverty status is determinable/assessed is lower than the estimate of total population due to the inability of the Census to determine income for everyone estimated to reside a particular block group.

# Service Equity Analysis: May 2024

Table 5. Systemwide disparate impact and disproportionate burden equity analysis summary for all major service decreases

Systemwide Disparate Impact and Disproportionate Impact Analysis: All Decreases				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	7,477	2,757	7,087	2,794
District	1,922,542	1,126,534	2,576,564	429,175
District Total	3,049,076		3,005,739	
% District Not Impacted	99.61%	99.76%	99.73%	99.35%
% District Impacted	0.39%	0.24%	0.27%	0.65%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB thresholds are 90% for service increases & 110% for service decreases	DI Threshold	Minority Pop Impacted	DB Threshold	Low Inc. Pop Impacted
	0.43%	0.24%	0.30%	0.65%

For system-level service decreases (service decrease on the Free MallRide), **non-minority populations stand to be impacted more than minority populations** (0.39% vs. 0.24%, respectively). The difference does not surpass the disparate impact threshold of 0.43%. Therefore, no system-level disparate impact finding is found with the proposed major service decrease. **Low-income populations stand to be impacted more than non-low-income populations** (0.65% vs. 0.27%, respectively). The difference exceeds the 10% disproportionate burden threshold of 0.30%. Therefore, a system-level disproportionate burden is found with the proposed major service decrease.

Table 6. Systemwide disparate impact and disproportionate burden equity analysis summary for all major service increases

Systemwide Disparate Impact and Disproportionate Impact Analysis: All Increases				
	Non-Minority Population	Minority Population	Non-Low-Income Population	Low-Income Population
Route Service Area Impacted	4,539	2,348	4,869	2,017
District	1,922,542	1,126,534	2,576,564	429,175
District Total	3,049,076		3,005,739	
% District Not Impacted	99.76%	99.80%	99.81%	99.53%
% District Impacted	0.24%	0.20%	0.19%	0.47%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB thresholds are 90% for service increases & 110% for service decreases	DI Threshold	Minority Pop Impacted	DB Threshold	Low Inc. Pop Impacted
	0.21%	0.20%	0.17%	0.47%

For system-level service increases (reinstatement of the Free MetroRide), **minority populations stand to benefit less than non-minority populations** (0.20% vs. 0.24%, respectively). This difference falls just below

# Service Equity Analysis: May 2024

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the disparate impact threshold of 0.21%. Therefore, a system-level disparate impact finding is found with the proposed major service increase. **Low-income populations stand to benefit more than non-low-income populations** (0.47% vs. 0.19%, respectively). The difference is above the 10% disproportionate burden threshold of 0.17%. Therefore, no system-level disproportionate burden is found with the proposed major service increase.

**Figures 1 and 2** illustrate the locations of above average low-income and minority block groups within the District as well as highlight the two bus routes with major service changes (orange). Compared to the District overall, both the Free MallRide and Free MetroRide serve above-average low-income populations in downtown Denver. The Free MetroRide is currently suspended, and it is proposed to be reinstated while the Free MallRide is proposed to have a reduction in service.



# Service Equity Analysis: May 2024

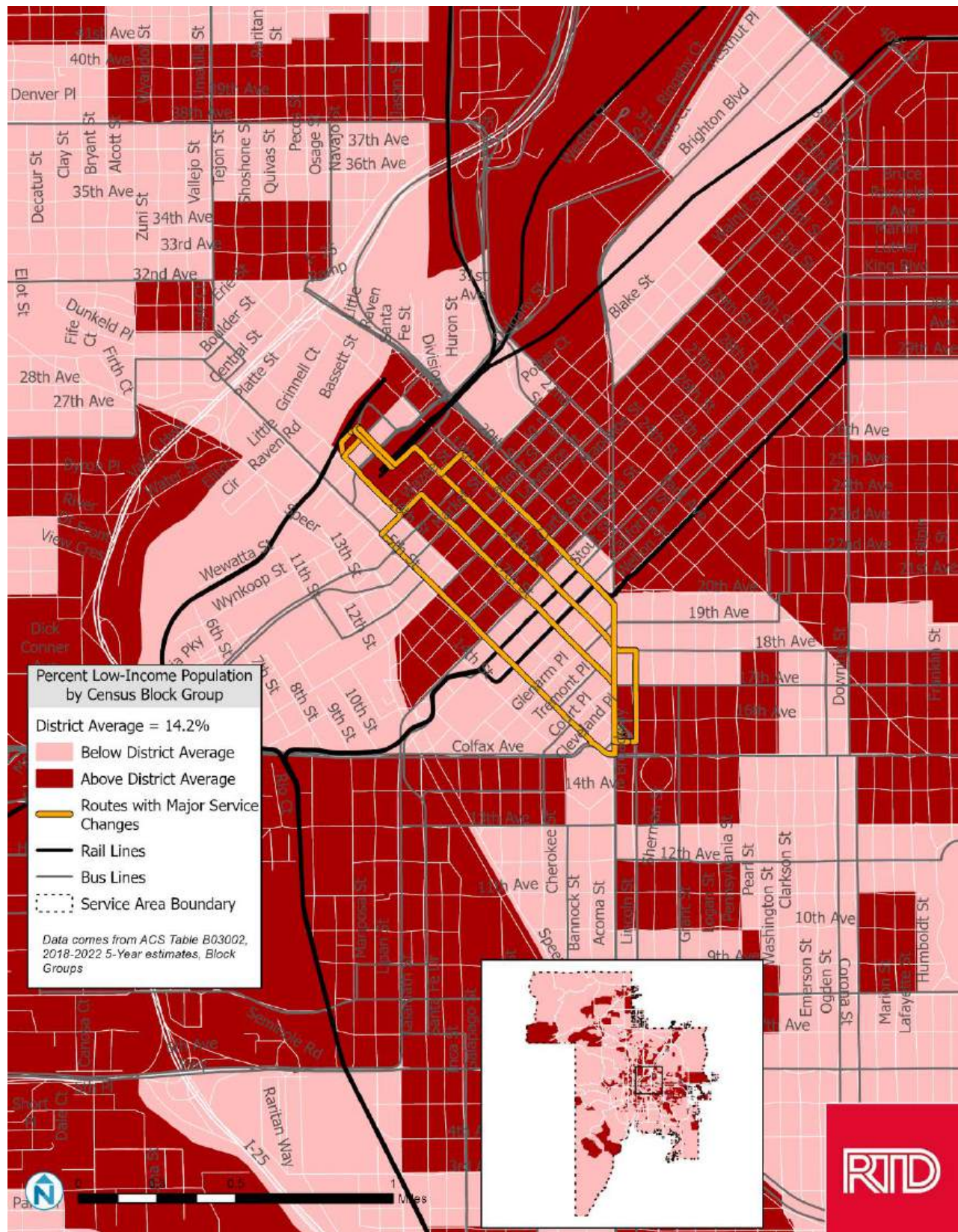


Figure 1. Block groups with above-average low-income population and routes with major service changes;  
US Census Bureau 2018-2022 5-Year Estimates



# Service Equity Analysis: May 2024

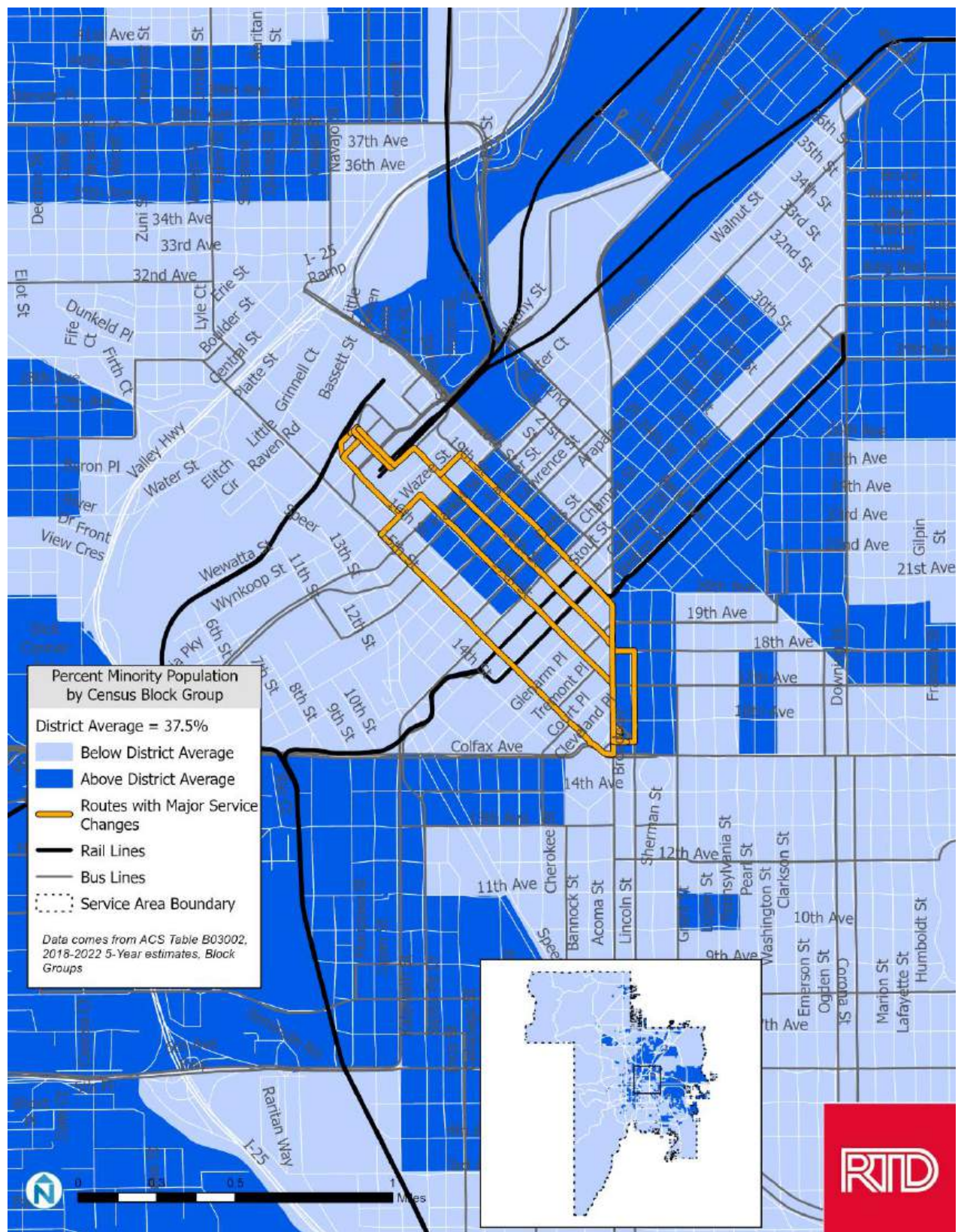


Figure 2. District block groups with above-average minority population and routes with major service changes; US Census Bureau 2017-2021 5-Year Estimates



# Service Equity Analysis: May 2024

The **January 2024** to **May 2024** service changes are captured in **Figure 3**. This map provides a generalized view of where service is changing at the route pattern level. The **January 2024** bus network and the addition of the Free MetroRide is colorized according to the percentage change in service hours. The Free MallRide is shown in teal (29% service change). The network also includes the Free MetroRide in blue, representing the reinstatement of service (100%). All other bus routes, shown in gray, are programmed to undergo minimal (e.g., schedule adjustments, minor realignments) or no service changes in **May 2024**.

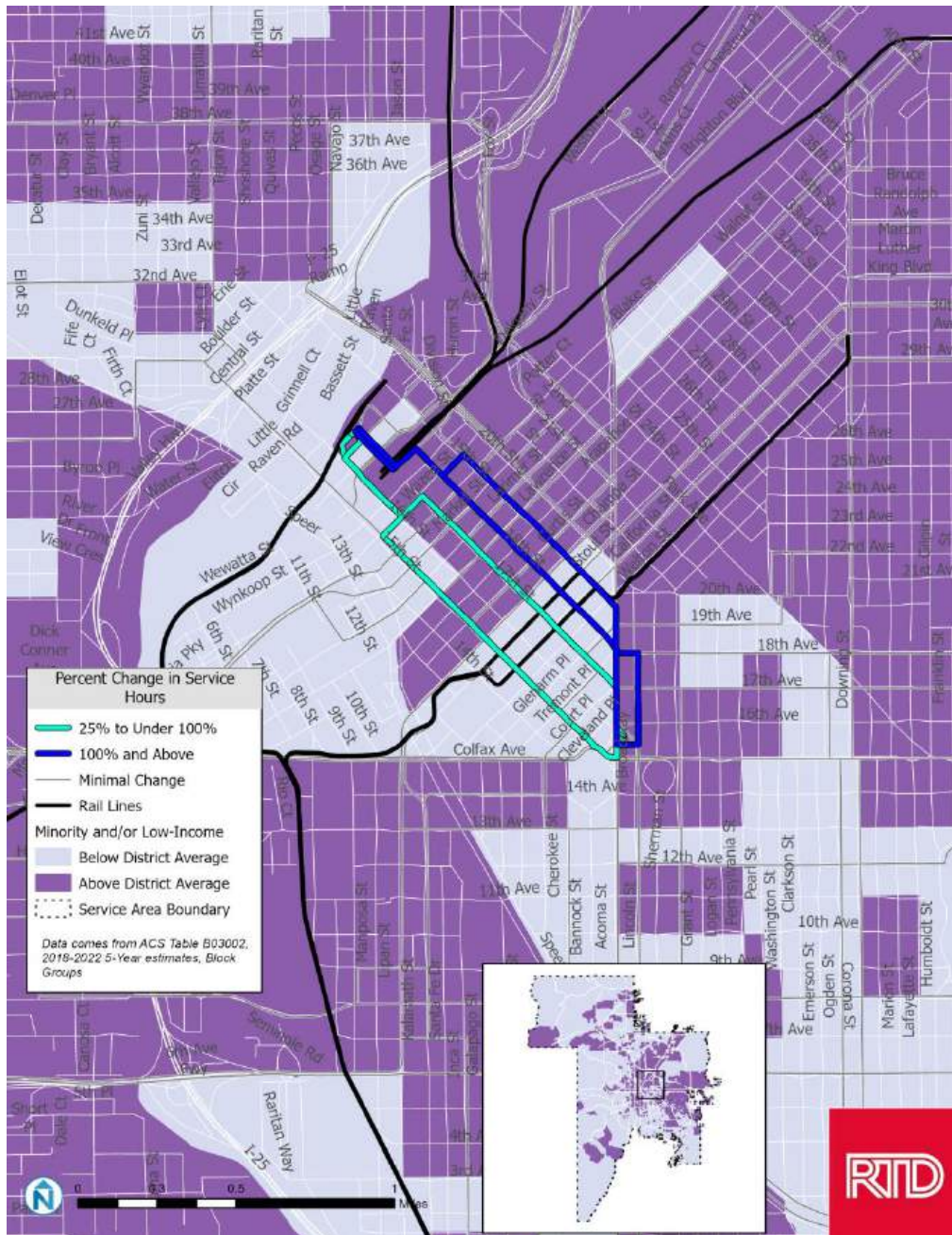


Figure 3. Depiction of route changes by percent change in service hours



# Service Equity Analysis: May 2024

## Summary of Findings

The systemwide service modifications proposed between **January 2024** and **May 2024** include schedule adjustments, suspension of school trips, changes to summer schedules and trip availability and additional service. The major service changes were entirely focused on bus services with a major service decrease on the Free MallRide and a major service increase on the Free MetroRide.

### Route-level Findings:

- Of the 37 total services with proposed changes, taken individually, **2 had potential findings.**
- **The Free MallRide has a potential disproportionate burden finding** due to low-income populations receiving +0.32% more impact than non-low-income populations. Minority populations received 0.20% less of an impact than non-minority populations.
- **The Free MetroRide has a potential disparate impact finding** due to minority populations receiving 0.16% less benefit than non-minority populations. Low-income populations benefited 0.31% more than non-low-income populations.

**Table 7** 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 7. Summary of major service changes by change type and impact

Service Change Type	Route	Potential Disparate Impact?	Potential Disproportionate Burden?	Service Change Pct
Increase	Free MetroRide	No	Yes	100%
Decrease	Free MallRide	Yes	No	29.1%

### Systemwide-level Findings:

- The Free MallRide and Free MetroRide comprise the May 2024 runboard’s systemwide major service decreases and increases, respectively.
- For the proposed service increase on the Free MetroRide, of the almost 6,900 people located within the block groups that include the route’s stops, low-income population represented a higher share of the population than District averages, indicating targeted services to low-income populations. **Low-income populations received a greater increase in service (were positively impacted more) compared to non-low-income populations.** Low-income areas benefited 0.28% more compared to non-low-income areas. However, **minority populations received a lower increase in service (were less positively impacted) compared to non-minority populations.** Minority areas benefited 0.03% less compared to non-minority areas. This difference met the disparate impact threshold; therefore, a system-level disparate impact was found with the proposed change.
- When considering the proposed service decrease on the Free MallRide for the demographics within the block groups that include the route’s stops and as a proportion to the District overall, **minority populations were impacted less compared to non-minority populations.** Minority population areas received 0.15% less of an impact compared to non-minority areas. This was below the disparate

# Service Equity Analysis: May 2024

impact threshold; therefore, no systemwide disparate impact was found. However, **low-income populations as a received 0.38% more of an impact than non-low-income populations.** This was above the threshold for a potential disproportionate burden; therefore, a potential disproportionate burden was found with the proposed service decrease.

## 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 **May 2024** service changes<sup>4</sup> include reduction of service on the Free MallRide and reinstatement of the Free MetroRide, both of which serve low-income populations at rates higher than the District average.

RTD recommends keeping the **May 2024** service plan as proposed as there are no practical alternatives to avoid, minimize or mitigate the disparate impact (Free MetroRide) and disproportionate burden (Free MallRide). The substantial legitimate justification for the Free MallRide service reduction is evident as this change is due to the ongoing construction work on the 16<sup>th</sup> Street Mall and the Near-Term Downtown Rail Reconstruction Project. Moreover, the Free MetroRide service increase will be utilized as a mitigation measure (i.e., providing customers with alternative connection between Denver Union Station and the Central Business District) due to the downtown rail reconstruction project. Thus, providing the substantial legitimate justification for the reinstatement.

Additionally, the overall potential benefits of the proposed service plan to customers are significant, with a greater benefit to minority and low-income customers. Specifically, a total of 13 of the 16 minor changes are considered minority bus routes and a total of 10 out of 16 are considered low-income bus routes. These minor changes include improvements to on-time performance for 14 bus routes, stops being added to one bus route to improve operations and transit access and the introduction of all-day service to one bus route to mitigate impacts on rail service due to construction.

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<sup>4</sup> <https://www.rtd-denver.com/service-changes>

# Service Equity Analysis: May 2024

## Appendix A: Systemwide Service Changes

Change Type	Service Changes	
	Route	Description
<b>Modified</b>	<b>0L</b>	It is proposed to introduce all-day service to address the impacts to customers on Light Rail during the downtown rail reconstruction project. This service change would be discontinued after the completion of the light rail reconstruction project.
	<b>8</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekdays, Saturdays, and Sundays/Holidays.
	<b>11</b>	Suspend seasonal school tripper service. Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>12</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>20</b>	Suspend seasonal school tripper service. Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>24</b>	Suspend seasonal school tripper service. Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>37</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>45</b>	Adjust routing to use Airport Way in both directions instead of Peña Blvd. Add eastbound bus stop 40 <sup>th</sup> Ave & 40 <sup>th</sup> Circ E (Stop ID: 24702) and westbound bus stop 40 <sup>th</sup> Ave & Airport Way (Stop ID: 24701) to route to improve operations and transit access.
	<b>65</b>	Suspend seasonal school tripper service.
	<b>73</b>	Suspend seasonal school tripper service.
	<b>83 D/L</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>105</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>120W/E</b>	It is proposed to adjust the route name to just '120' in coordination with other RTD local route names and to reduce confusion about 120E at Eastlake related to direction. It is also proposed to streamline the route name by adjusting it to '120th Avenue Crosstown'.
	<b>120L</b>	It is proposed to adjust the route name to 'Thornton/Brighton' to better identify the starting and ending terminals of the route and to reduce confusion with route 120 (Local).
	<b>121</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>169</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>169L</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekday service.
	<b>225</b>	Reduce weekday service frequency for summer.
	<b>228</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekdays only.
	<b>DASH</b>	Reduce weekday service frequency for summer.
	<b>FF1</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekdays, Saturdays, and Sundays/Holidays. It

# Service Equity Analysis: May 2024

Change Type	Service Changes	
	Route	Description
		is proposed to adjust the last eastbound trip, on Saturday and Sunday each, to 15 minutes earlier leave time from downtown Boulder Station, to allow enough time for arrival at Denver Union Station before closing of the facility at 00:30am. New trip leave times would be 11:12pm Saturdays and 11:42pm Sundays.
	<b>Free MetroRide</b>	In accordance with the System Optimization Plan, with the ongoing 16th Mall construction and in anticipation of downtown rail reconstruction project, reinstatement of the Free MetroRide service is recommended to give customers alternative connection between Denver Union Station and the Central Business District.
	<b>GS</b>	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance, are proposed for weekdays only.
	<b>JUMP</b>	Reduce weekday service frequency for summer.
	<b>NB</b>	Short-turn trips at Nederland High School due to Eldora Ski Resort not being in operation.
	<b>RX</b>	It is proposed to consolidate the current 5:24pm and 6:48pm northbound trips and to provide 1 northbound trip, from Civic Center Station, at 6:10pm, due to low ridership. It is also proposed to shift the current 5:04pm northbound trip to 5:10pm, to better balance the overall headways/schedule.
	<b>Platte Valley FlexRide</b>	It is proposed to remove the flex route and to allow Platte Valley FlexRide to operate as a regular FlexRide service within the newly proposed boundaries of: Federal Blvd to the west, Alameda Ave to the south, Colfax to the north, and Santa Fe to the east. This service will operate from 5:30am to 6:00pm.
	<b>Evergreen FlexRide</b>	It is proposed to combine the Evergreen North and Evergreen South FlexRide service areas into a singular service area.
	<b>E Line</b>	Schedule adjustments related to the coping panel project will be necessary to accommodate reduced operating speeds in the Southeast Corridor. Service frequency will be reduced during the peak periods to service every 30 minutes from the current 15-minute frequency.
	<b>D Line</b>	It is recommended that D Line service be replaced with the former C Line pattern of service (Mineral Station – Denver Union Station) renamed Special Service Train for the duration of the downtown rail reconstruction project.
	<b>H Line</b>	Due to coping panel work resuming and rail reconstruction project taking place in the downtown loop it is recommended to modify/replace service on the H Line with the J Line pattern, operating Florida Station to Denver Union Station until the downtown Denver rail reconstruction project is completed.
	<b>N Line</b>	It is proposed to extend on Saturday evening, one southbound at 11:13 p.m., and northbound at 11:56 p.m. responding to increased customer requests, supported by increased ridership on the existing trips preceding the proposed trip times. The last three northbound trips are averaging over 94 boardings.
	<b>R Line</b>	Schedule adjustments related to the coping panel project will be necessary to accommodate slower operating service in the Southeast Corridor.
<b>Reductions</b>	<b>Free MallRide</b>	Reduce frequencies on the Free MallRide to 10-minute headways. This change will free up operator resources to reinstate Free MetroRide service.
<b>Suspensions</b>	<b>L Line</b>	Service will be temporarily suspended due to the downtown rail reconstruction project until September 2024.



## **Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores**

# Service Equity Analysis: May 2024

Free MallRide  
Reduction of service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Reduced Access	<div><div>Reduction in access to an estimated 114,803 jobs</div><div><div><div>Low/Medium Wage Jobs*</div><div><div></div><div>18%</div></div><div><div></div><div>45%</div></div></div><div><div>Jobs Held by Workers of Color*</div><div><div></div><div>13%</div></div><div><div></div><div>14%</div></div></div><div><div>Jobs Held by Hispanic/Latino Workers*</div><div><div></div><div>14%</div></div><div><div></div><div>18%</div></div></div><div><div></div><div>MallRide</div><div>District</div></div></div></div>	222	40	2	2	0	1	8	150	19

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2019.

# Service Equity Analysis: May 2024

Free MetroRide  
Reinstatement of service

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
New Access	<div>Creates access to an estimated <b>116,136 jobs</b></div> <div><div><div>Low/Medium Wage Jobs*</div><div><div><div></div><div>18%</div></div><div><div></div><div>45%</div></div></div></div><div><div>Jobs Held by Workers of Color*</div><div><div><div></div><div>13%</div></div><div><div></div><div>14%</div></div></div></div><div><div>Jobs Held by Hispanic/Latino Workers*</div><div><div><div></div><div>14%</div></div><div><div></div><div>18%</div></div></div></div><div><div>MetroRide</div><div>District</div></div></div>	229	47	2	2	0	0	8	153	17

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2019.





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# May 2024 Proposed Service Changes – Title VI Service Equity Analysis

Carl Green Jr., Civil Rights Director

Martin Romero, Transit Equity Manager

# Presentation Overview

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- § Proposed Service Changes Summary
- § Federal Transit Administration (FTA) Requirements
- § Equity Analysis Decision Tree
- § Title VI Policies and Methodology
- § Results
- § Public Outreach
- § Conclusion and Recommendation

## Proposed Service Changes Summary

<b>Reinstatement</b>	Free MetroRide
<b>Modified</b> (29 services)	0L, 8, 11, 12, 20, 24, 37, 45, 65, 73, 83D/L, 105, 120W/E, 120L, 121, 169, 169L, 225, 228, DASH, FF1, GS, JUMP, NB, Platte Valley FlexRide, Evergreen FlexRide  N Line
<b>Reduced</b> (6 services)	Free MallRide, RX, E Line, D Line, H Line, R Line
<b>Temporary Suspension</b>	L Line



# FTA Requirements for Service Changes

Proposed May 2024 Service Changes

## Title VI of the Civil Rights Act of 1964

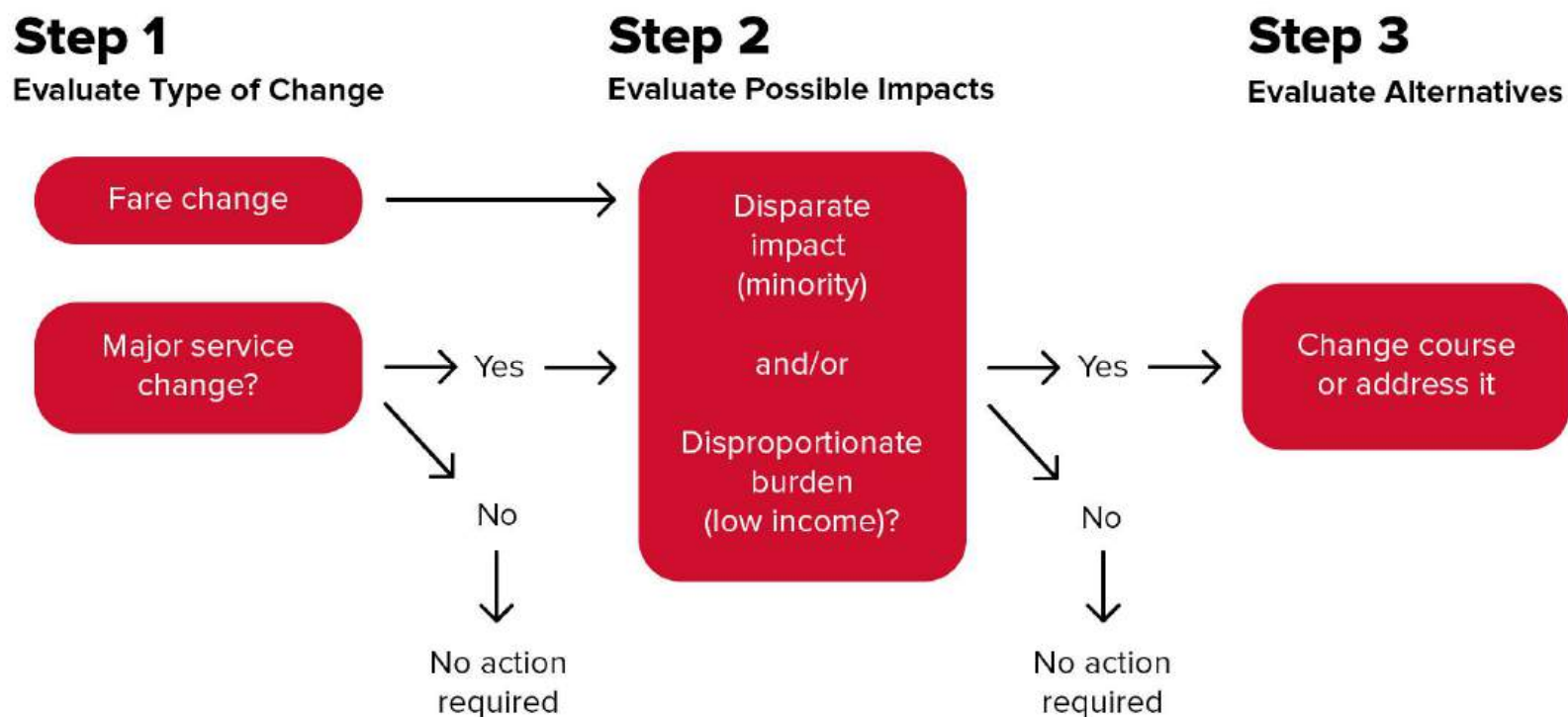
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"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

FTA Circular 4702.1B *Title VI Requirements and Guidelines* and RTD Title VI Program

# Equity Analysis Decision Tree



Minority and Low-Income = Equity Populations



# Title VI Policies

Major Service Change, Disparate Impact and Disproportionate Burden Policies



# Major Service Change Policy

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## Definition:

§ 25% + or - in the service hours of any route/line that would remain in effect for 12+ months

## Major Service Change Results:

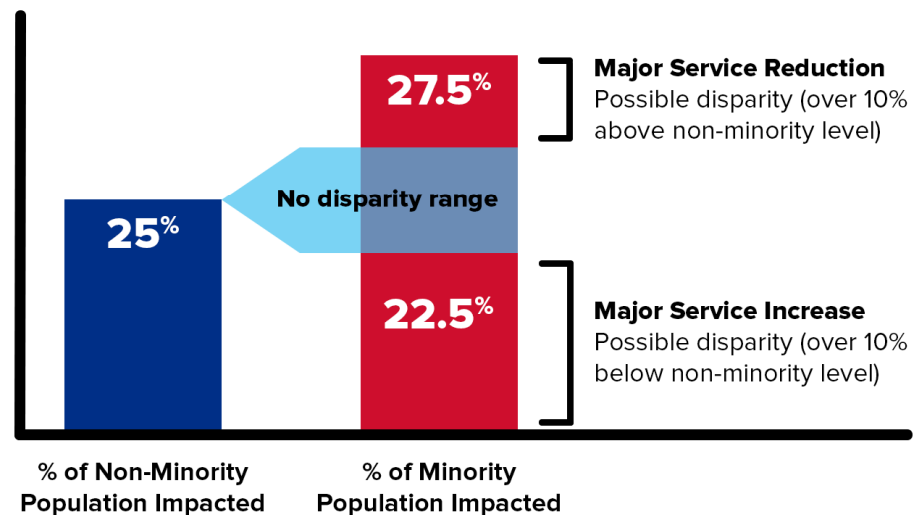
§ Increase – one out of 37 met the major service change threshold

§ Reduction – one out of 37 met the major service change threshold

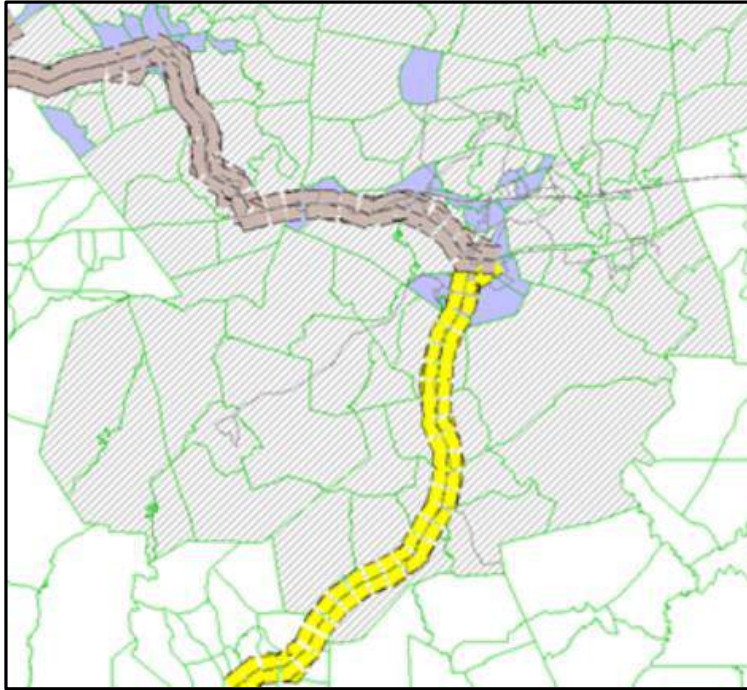
# Disparate Impact and Disproportionate Burden Policies

Title VI Policies  
=  
Thresholds to  
Evaluate Possible Impacts



## Testing for Disparate Impact at the System Level



Threshold Calculation: 10% of 25% (non-minority) = 2.5%

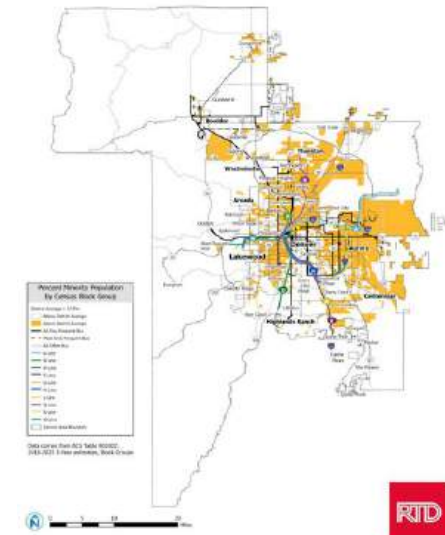


### Legend

  1/4-mile route buffer around a route

## Methodology

1. Route-level analysis applied
2. System-level analysis applied



## Route Level Results

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### § Free MallRide (Reduction)

- Potential disproportionate burden

### § Free MetroRide (Increase)

- Potential disparate impact

# Key Public Activity Centers Assessment

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**Retail and  
Convenience  
Stores**



**Schools  
PreK -  
College**



**Social  
Services**



**Senior  
Housing**



**Jobs**

## Key Public Activity Centers – Free MallRide

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Reduced Access	Total
Jobs	114,803
Grocers	150
Social Service Centers	40
Senior Housing	2
Academic Institutions	11

## Key Public Activity Centers – Free MetroRide

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New Access	Total
Jobs	116,136
Grocers	170
Social Service Centers	47
Senior Housing	2
Academic Institutions	10



## Systemwide Level Results – Free MallRide

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§ Non-minority populations stand to receive more of the impact of the service decrease compared to minority populations

- 0.15% more for non-minority groups (0.39% vs. 0.24% minority)
- Difference does not meet Disparate Impact threshold (0.43%)

§ Low-income populations stand to receive more of the impact of the service decrease compared to non-low-income populations

- 0.38% more for low-income groups (0.65% vs. 0.27% non-low-income)
- Difference does meet Disproportionate Burden threshold (0.30%)

## Systemwide Level Results – Free MetroRide

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§ Minority populations received slightly lower increase in service (were positively impacted less) compared to non-minority populations

- 0.04% less for minority groups (0.20% vs. 0.24% non-minority)
- Difference does meet Disparate Impact threshold (0.21%)

§ Low-income populations receive greater service increase (positively impacted more) compared to non-low-income populations

- +0.28% more for low-income groups

# Public Outreach

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## § Open houses

- March 6th @ noon (Virtual)
- March 6th @ 5:30 pm (In person)
- March 7th @ noon (Virtual)

## § Direct outreach to 97 key public activity centers within a 1/4 mile of the Free MallRide and Free MetroRide

# Conclusion

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§ No practical alternatives to avoid, minimize or mitigate the findings

§ Substantial legitimate justification

- Free MallRide: ongoing construction on the 16th Street Mall and the downtown rail reconstruction project
- Free MetroRide: mitigation measure due to the downtown rail reconstruction project

## Recommendation

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§ FTA requires the agency's Board of Directors be made aware, consider and approve the equity analysis prior to the agency taking action

§ May 2024 Title VI service equity analysis approval

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# **RTD 2025-2028 Title VI Program**

## **Attachment R: September 2023 Service Equity Analysis**

DRAFT



# BOARD OF DIRECTORS REPORT

## September 2023 Title VI Service Equity Analysis

Committee Meeting Date:
July 12, 2023
Board Meeting Date:
July 25, 2023

### RECOMMENDED ACTION

For the Board of Directors to adopt the Title VI Service Equity Analysis report for the September 2023 service changes to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964 (Title VI).

### STAFF REPRESENTATIVE

Carl Green Jr., Director, Civil Rights

Jessie Carter II, Senior Manager, Service Planning and Scheduling

### PRESENTATION LENGTH

15 minutes

### BACKGROUND

The 26 service change recommendations for September 2023 provide opportunities for bus and rail operators to select new work assignments and for the Service Development Division to adjust the overall operations plan for the transit network. Additionally, with the Board-adopted Reimagine RTD System Optimization Plan (SOP), several service change recommendations reflect the first phases of SOP implementation to provide the best possible customer value.

The Board-adopted guidance for service change recommendations continues to be:

- Service performance evaluation based on service standards
- Maintaining the overall integrity of the transit network and on transit dependent markets
- Making alternative services available to affected customers
- Cost-effective distribution throughout the district and family of services and the ability to enhance service when possible
- Compliance with 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
- Response to changes in the communities where services are provided

### Title VI Service Equity Analysis Requirements

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of 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, 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. The September 2023 service change recommendations include one major service change out of 26 total changes. Thus, an analysis is

required to be brought before the Board for approval. The complete Title VI Service Equity Analysis report is included in Attachment A.

### **Title VI Service 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. On May 24, 2022, the Board approved and adopted the Title VI Program Update and required policies. Collectively, these policies provide the foundational requirements for evaluating service change recommendations for equity. These policies and their applicable thresholds are listed below:

Major Service Change Policy: 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 12 or more months. All major service changes will be subject to an equity analysis.

#### Title VI Policies:

**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.

**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. A low-income population is a group of households who are at or below 150% of the Department of Health and Human Services Poverty Guidelines.

### **DISCUSSION**

Staff recommends changes to 26 bus routes and two rail lines in the forthcoming September 2023 runboard. Of these 26 changes, one service has recommended additions to service 25% greater than that of baseline service, thus meeting established thresholds for a major service change. Those routes are shown in bold in the table below.

<b>Modified Services (eight services)</b> <i>(Additional trips, expanded service spans, increase reliability)</i>	16, 66, 105, 120E/W, 121, <b>GS</b> , E, W
<b>Seasonal Adjustments (12 services)</b>	11, 20, 24, 30, 51, 65, 73, 225, DASH, JUMP, SKIP, NB
<b>On-Time Performance Adjustments (six services)</b>	8, 19, 21, 76, FF1, P

Methodology: Disparate impact and disproportionate burden analyses were performed at the route/line level, route/line block group and network level to identify potential disparities in service changes based on race/ethnicity or income.

#### Summary of Findings:

- Of the over 25,000 people with access to bus stops within the service area of the bus routes with a major service improvement (Route GS), low-income groups represented a higher share of the population than district averages, indicating targeted service increases to low-income populations.
- When considering the demographics within the service areas of the bus route with a major service change and as a proportion to the district overall, low-income populations received a greater increase in service (were positively impacted more) compared to non-low-income populations. Low-income areas benefited 1.19% more compared to non-low-income areas. Therefore, no disproportionate burden is found. Additionally, minority populations received a slightly lower increase in service (were positively impacted less) compared to non-minority populations. Minority areas benefited 0.52% less compared to non-minority areas. This difference meets the disparate impact threshold; therefore, a system-level disparate impact was found with the recommended change.

### **Conclusions:**

Although only one major service change resulted in a potential disparate impact at the route and network level, Title VI concerns are minimal when comparing the service changes between the May 2023 and September 2023 runboards. Additionally, low-income groups represented a higher share of the population than district averages, indicating targeted service increases to low-income populations. Moreover, the Route GS reinstatement increases access to key public service destinations. Overall, the minor changes (modified services) have positively impacted equity populations slightly more than non-equity populations.

In adopting this report, the agency seeks to meet the 2021-2026 Strategic Plan priority of Community Value while maintaining compliance with Title VI federal regulations. Staff will continue to assess the equity implications for all subsequent service change recommendations and will recommend adjustments and service alternatives as appropriate in future service change recommendations.

### **FINANCIAL IMPACT**

The adoption of the Title VI Service Equity Analysis will not result in any direct or foreseeable financial impacts.

### **ATTACHMENTS:**

- Attachment A - Title VI Service Equity Analysis Report for Sep 2023 Runboard Proposal (PDF)
- Attachment B - Service Equity Analysis Recommended Action July 11, 2023 (PPTX) (PPTX)

<b>RESULT:</b>	<b>ADOPTED BY CONSENT VOTE [UNANIMOUS]</b>
<b>MOVER:</b>	Bob Broom, Director, District F
<b>SECONDER:</b>	Kate Williams, Director, District A
<b>AYES:</b>	Bouquet, Broom, Buzek, Catlin, Davidson, Dishell, Guissinger, Guzman, Harwick, Rosenthal, Ruscha, Sloan, Tisdale, Whitmore, Williams

Prepared by:

Annette Hunter, Transit Equity Specialist

Martin Romero, Transit Equity Manager

Approved by:



Michael Ford, Chief Operations Officer 7/3/2023

Authorized by:



Debra A. Johnson, General Manager and CEO 7/5/2023



# Title VI Service Equity Analysis Report

September 2023 Service Changes

# Service Equity Analysis: September 2023

## Contents

Executive Summary.....2

    Methodology .....2

    Major Service Changes .....2

    Findings.....2

Introduction.....2

    Title VI and Environmental Justice.....2

    Service Change Philosophy .....3

    RTD’s Title VI Equity Analysis Policies .....4

Analysis.....5

    Data Sources and Methodology .....5

    Public Outreach Overview .....5

    Major Service Change, Disparate Impact and Disproportionate Burden Analysis .....6

        Changes by Transit Mode.....6

    Major Service Change Review .....7

        Major Service Change Reductions/Eliminations .....7

        Major Service Change Increases .....7

        Route- and Line-Level Analysis .....7

        Network Analysis .....9

Summary of Findings .....15

Appendix A: Systemwide Service Changes

Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores

# Service Equity Analysis: September 2023

## Executive Summary

This document summarizes the analysis of service changes between the May 2023 and September 2023 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 proposes changes to 26 bus route/patterns in the forthcoming September 2023 runboard. Of these changes, one service meets established thresholds for a major service change. The route listed below has proposed service adjustments that were greater than 25% of baseline service or services being eliminated.

<b>Service Reinstatement (one service)</b>	<b>GS – Golden / Boulder:</b> Reinstatement service on the GS (Golden / Boulder) with four trips in each direction.
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### Findings

Alterations to the proposed September 2023 service changes include reinstatement of the GS route between Federal Center Station and Downtown Boulder. This route serves a high concentration of low-income populations.

When considering the demographics within the service areas of this route with a major service change and as a proportion to the district overall, low-income equity populations received a greater increase in service (i.e., were more positively impacted) compared to non-low-income populations. Low-income areas had a +1.19% benefit above non-low-income areas. Minority areas received a lower increase in service (i.e., were less positively impacted) compared to non-minority populations.

Finally, a potential disparate impact was identified, but no potential disproportionate burden at the route and network level.

## Introduction

### Title VI and Environmental Justice

Equity is a core principle of RTD’s functional mission to provide mass transit service within the Denver metropolitan 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.



# Service Equity Analysis: September 2023

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 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 proposed to occur between the May 2023 and September 2023 runboards. Routes with major service changes include one major increase via reinstatement of a formerly suspended route pattern. These changes and all others have been reviewed individually at the route/line level and in aggregate at the block group level to identify potential impacts on 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 adding new routes/lines, eliminating existing routes/lines and changing the alignment and trip frequency within existing routes/lines. RTD has established principles to identify the service changes needed to meet the diverse travel needs of those within the district and maintain a high-performance, sustainable transit system.

### RTD Service Changes Guiding Principles

- Service performance evaluation based on 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
- Compliance with 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
- 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 agency's responsibility to identify underperforming services 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 to identify underperforming

# Service Equity Analysis: September 2023

services on a class-of-service basis. The agency 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.

*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% addition or reduction in the service hours of any route that would remain in effect for 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% 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% more than non-low-income populations; this level of impact is considered a disproportionate burden. A low-income population is a group of households at or below 150% 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 Equity Analysis: September 2023

## Analysis

### Data Sources and Methodology

Demographic data used for this analysis comes from the Census Bureau’s American Community Survey (ACS) 5-Year Estimates for years 2017 to 2021 and is reviewed at the census block group geographic level. Other data related to the analysis include 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 on district equity communities.

The equity analysis for the September 2023 runboard analyzed 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/line’s quarter-mile service area. These proportional differences were compared against district population proportions of equity populations and route/line proportions of equity populations.

Low-income status for the 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 three. Minority status was based on the non-white and Hispanic or Latino count of the total population. The service area was based on the collection of block groups within district boundaries.

Route/line 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 the 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/line 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

Three public meetings were conducted May 15-16, 2023. The comments collected on service changes during these meetings are summarized in the table below. In addition to the general outreach, the Transit Equity Office reached out to 14 community-based organizations and schools surrounding the routes/lines to inform and encourage community members to attend the open houses. Table 1 captures the meeting locations, dates, number of attendees and the common themes of attendees’ comments pertaining to the three major service changes described in this analysis.

# Service Equity Analysis: September 2023

Table 1. Public meeting details

Date and Time   Location	Comment Themes	Number of Attendees
May 15 at 12 p.m.   Virtual	Clarification sought on the routing for GS. Inquired if Route GS would travel via Colfax or US 6.	6
May 15 at 5:30 p.m.   In Person	No attendee comments regarding the one major service change, Route GS	8
May 16 at 5:30 p.m.   Virtual	No attendee comments regarding the one major service change, Route GS	1
		<b>Total – 15</b>

The public was also notified of the ability to submit comments to [service.changes@rtd-denver.com](mailto:service.changes@rtd-denver.com), by phone at 303-299-2004 and by fax 303-299-2227.

## Major Service Change, Disparate Impact and Disproportionate Burden Analysis

Proposed service changes for the September 2023 runboard that resulted in a 25% or greater change in service were categorized by equity population (minority or non-minority, low-income or non-low-income) for comparison. Routes were categorized as either equity or non-equity based on their identification within the prior network using 2017-2021 ACS five-year demographic data.

A comparative, proportional equity analysis was completed to individually review the routes/lines. This analysis identified the equity and non-equity populations within a route/line service area and compared those against the equity and non-equity populations of the district. If impacted equity populations within the route/line service area received 10% or greater impacts compared to non-equity populations, the route/line had a potential finding of Disparate Impact (for minority populations) or Disproportionate Burden (for low-income populations). It 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

As RTD continues to adapt to changes affected by the pandemic, 26 bus routes will undergo service changes. Of these, five routes will see a total increase of **bus service by over 45 total weekday revenue service hours**. Changes to Route GS exceeded the major service change by being a reinstatement of previously suspended service; it accounts for 12 of the additional daily revenue service hours.

# Service Equity Analysis: September 2023

Table 2. Summary of service changes by transit mode

Mode	Additional Daily Hours
All Rail	0
All Bus	43
Overall	43

## 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/lines prior to individual review of routes/lines, route/line 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

No major reductions/eliminations.

### Major Service Change Increases

One bus route had major service changes, which included service increases of 25% or greater. This includes the reinstatement of service to Route GS, considered a major service change, and is therefore included in the review.

### Route- and Line-Level Analysis

Having identified the service changes that meet the definition of Major Service Change, the next step in the analysis is to look at each route or line individually to determine potential Disparate Impacts (DI) and Disproportionate Burdens (DB). 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/line with a major service change, determine the percent of the route's/line'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 major service change route were reviewed for potential DI or DB findings. For service increases, the following analysis examines the extent to which the benefits of the improvements are inclusive of minority and low-income populations. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The

# Service Equity Analysis: September 2023

narrative analysis of each line follows, which includes further considerations of access to jobs, education, health care, food and social services for minority and low-income populations.

## Route GS - Boulder/Golden

*Proposal: Reinstate route pattern with four northbound trips at 7:02 a.m., 8:22 a.m., 3:37 p.m. and 4:39 p.m., between Federal Center Station and Downtown Boulder Station. It is also proposed to reinstate four southbound trips at 7:10 a.m., 8:19 a.m., 4:36 p.m. and 5:13 p.m., between Downtown Boulder Station and Federal Center Station.*

As shown in Table 5, a lower percentage of the district's minority population stands to benefit from the proposed major service increase as compared to the non-minority population (1.07% vs. 0.44%, respectively). This difference exceeds (falls below) the 10% disparate impact threshold (0.96%). Therefore, a potential route-level disparate impact is found, requiring further examination (i.e., access to key public service destinations, community engagement, and network-level analysis). However, a higher percentage of the district's low-income population stands to benefit from the proposed Major Service Increase as compared to the higher-income population (1.68% vs. 0.55%, respectively). This difference does not exceed (falls below) the 10% disparate impact threshold (0.50%). Thus, there is no disproportionate burden at the line-level.

Table 5. Route GS Disparate Impact and Disproportionate Burden Analysis

Regional Route GS - Golden / Boulder				
May 2023 to September 2023 Service Change Analysis				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	20,528	4,947	14,175	7,216
District Statistics	1,922,542	1,126,534	2,576,564	429,175
District Total Base Population	3,049,076		3,005,739	
% of District Not Impacted	98.93%	99.56%	99.45%	98.32%
% District Impacted	1.07%	0.44%	0.55%	1.68%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% for service increases and 110% for service decreases % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.96%	0.44%	0.50%	1.68%

The reinstatement of Route GS would improve access to:

- About 34,856 jobs
  - 28% low-to-medium wage jobs, which is below the district average (45%)
  - 14% jobs held by minorities, which is at the district average (14%)
  - 15% jobs held by Hispanic/Latino workers, which is below the district average (18%)
- 179 retail/convenience stores
- 24 human and social services centers
- 12 senior housing and facilities
- 11 college, high school, middle school and elementary schools

# Service Equity Analysis: September 2023

## Network Analysis

In accordance with RTD's 2022 Title VI Program Update, a network-level analysis is required in addition to route- and line-level analysis. A network-level analysis provides further understanding of changes to service levels for Title VI protected populations at aggregate levels.

The major service change threshold of 25% or greater used for individual route-level analyses was used as precedent to determine potential adverse impacts and 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, bus service was increased by over 43 weekday revenue hours.
- Of the over 25,000 people served by stops within the service area with major service changes, low-income populations represented a higher population share than district averages. Of this cumulative figure, over 12,000 would receive service improvements for equity populations.
- At the network level, equity routes and non-equity routes<sup>1</sup> were compared only for those with major service changes. The one bus route with major service changes serves above-average low-income populations.

### **In the review of Route GS at the network level, there is a potential disparate impact finding.**

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 May 2023 to September 2023 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 non-low-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 (14.3%) and minority population (36.9%).

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.

<sup>1</sup> Based on the existence of the route within the May 2023 network and the population within a quarter mile of bus stops or rail stations. 2017-2021 5-Year ACS estimates were used for population identification.



# Service Equity Analysis: September 2023

There are 2,197 block groups defined as being wholly within or mostly within the district<sup>2</sup>. Using the 2017-2021 5-Year ACS Estimates, the 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 that set the thresholds for which block groups are classified as above average. While the percent minority figure of 36.9% was derived by using the base population of the service area (3.049 million) the low-income population percentage of 14.3% is derived from a slightly smaller population figure (3.005 million). This is due to the smaller population whose poverty status the Census Bureau can determine<sup>3</sup>. The thresholds summarized in Table 6 yielded 831 (38% of all) block groups above the district average for low-income population, and 830 (38%) block groups above the district average for minority populations.

Table 6. District averages; NTD 2018; ACS 2017-2021 5-Year estimates

Service Area (sq. mi.)	Total Block Groups	Total Population	Percent Minority	Total Population (assessed)	Percent Low-Income
2,342	2,197	3,049,076	36.9%	3,005,739	14.3%

The proposed major service change was examined in aggregate by transit mode to determine overall impacts on underlying populations. Table 7 summarizes the change in service for the block group population within one-quarter mile of bus stops with proposed major service changes proportionally compared to the 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. No major changes were proposed for rail services with the September 2023 runboard.

Table 7. Systemwide disparate impact and disproportionate burden equity analysis summary for all bus major service changes

Systemwide Disparate Impact and Disproportionate Impact Analysis: All Bus				
	Non-Minority Population	Minority Population	Non-low-income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>20,528</b>	<b>4,947</b>	<b>14,175</b>	<b>7,216</b>
<b>District</b>	1,922,542	1,126,534	2,576,564	429,175
District Total	3,049,076		3,005,739	
% District Not Impacted	98.93%	99.56%	99.45%	98.32%
% District Impacted	1.07%	0.44%	0.55%	1.68%
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
DI & DB thresholds are 90% for service increases & 110% for service decreases	DI Threshold	Minority Pop Impacted	DB Threshold	Low Inc. Pop Impacted
	0.96%	0.44%	0.50%	1.68%

<sup>2</sup> Some block groups are not completely contained within district boundaries due to differences in boundaries between the district and Census-defined geographies.

<sup>3</sup> The total population whose poverty status is determinable/assessed is lower than the estimate of the total population and results in a different base population used to determine the low-income percent of the population.

# **Service Equity Analysis: September 2023**

For system-level bus service changes, minority populations stand to benefit slightly less than non-minority populations (0.44% vs. 1.07%, respectively). The difference meets the Disparate Impact Threshold of 0.96%. Therefore, a system-level disparate impact finding is found with the proposed major service changes. Low-income populations stand to benefit more than non-low-income income populations (1.68% vs. 0.55% respectively), with low-income areas benefitting 1.19% more than non-low-income areas. Therefore, no system-level disproportionate burden is found with the proposed major service changes.

Figures 1 and 2 illustrate the locations of above-average low-income and minority block groups within the district and highlight the bus route with a major service change (orange). Route GS is currently suspended and is proposed to be reinstated with four trips in each direction/peak period.

# Service Equity Analysis: September 2023

## Service and Service Area with Low-Income Population

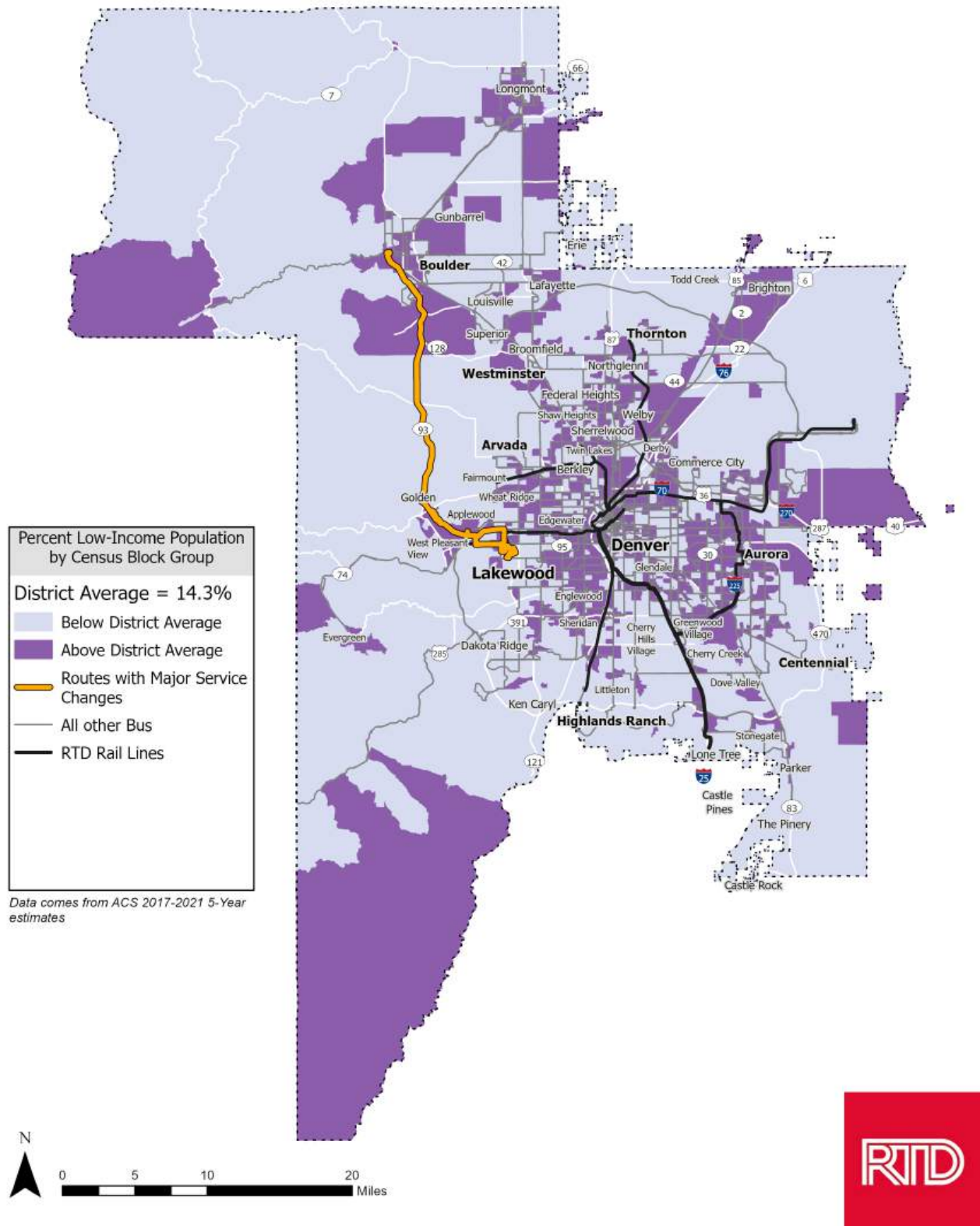


Figure 1. District block groups with above-average low-income population (purple); US Census Bureau 2017-2021 5-Year Estimates

# Service Equity Analysis: September 2023

## Service and Service Area with Minority Population

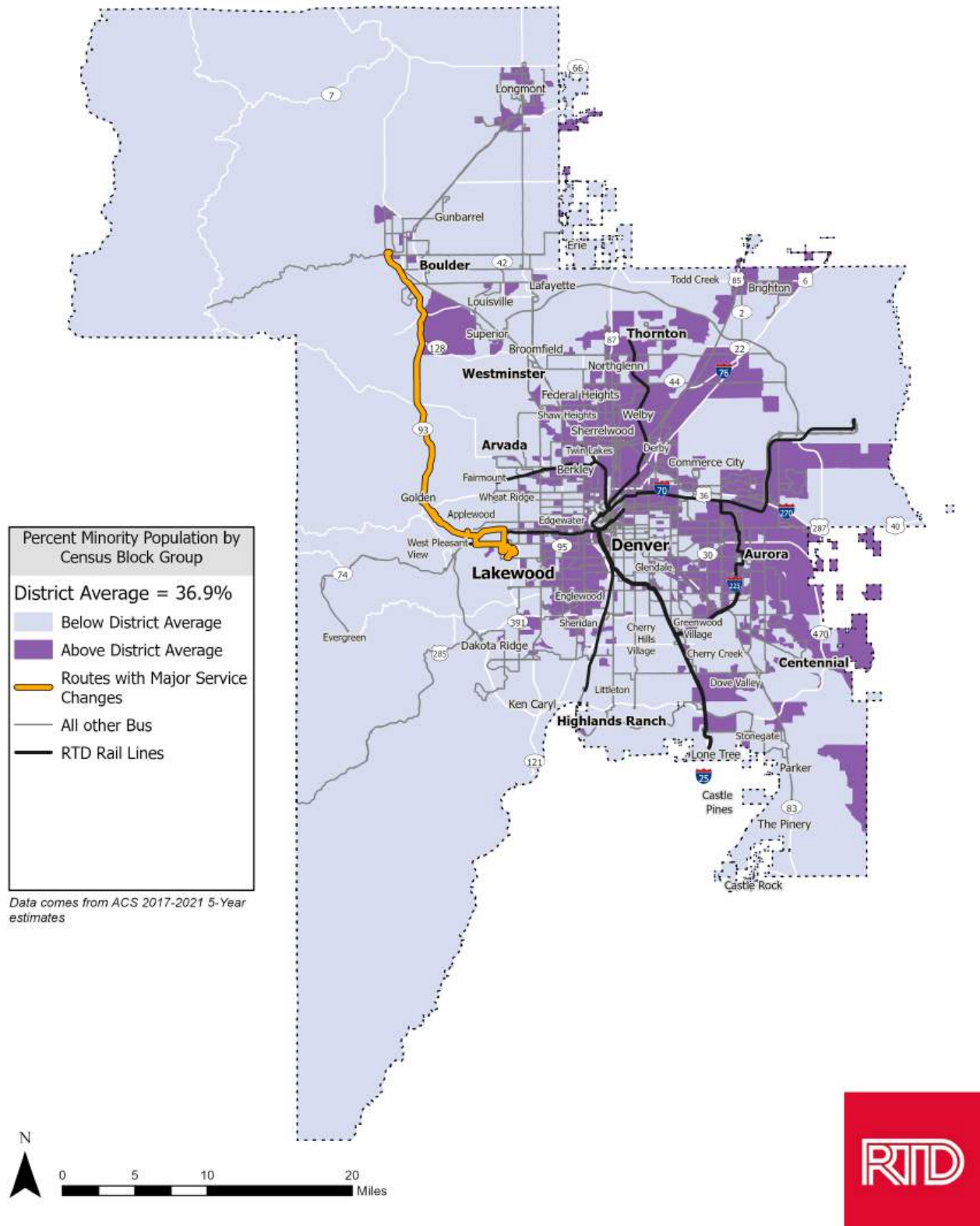


Figure 2. District block groups with above-average minority population (purple); US Census Bureau 2017-2021 5-Year Estimates



# Service Equity Analysis: September 2023

The May 2023 to September 2023 service changes are captured in Figure 3 and vary by the extent of the route and segment changes. This map provides a generalized view of where service is changing at the route pattern level. The May 2023 bus network is colorized according to the percentage change in service hours. Route GS is shown in blue (100% service change). The network also includes Route 16 in teal, representing significant modifications to its alignment and accompanying service hours (33%). Other routes shown in green have changes below the major service change threshold. All other bus routes, shown in gray, are programmed to undergo minimal (e.g., schedule adjustments, minor realignments) or no service changes in September 2023.

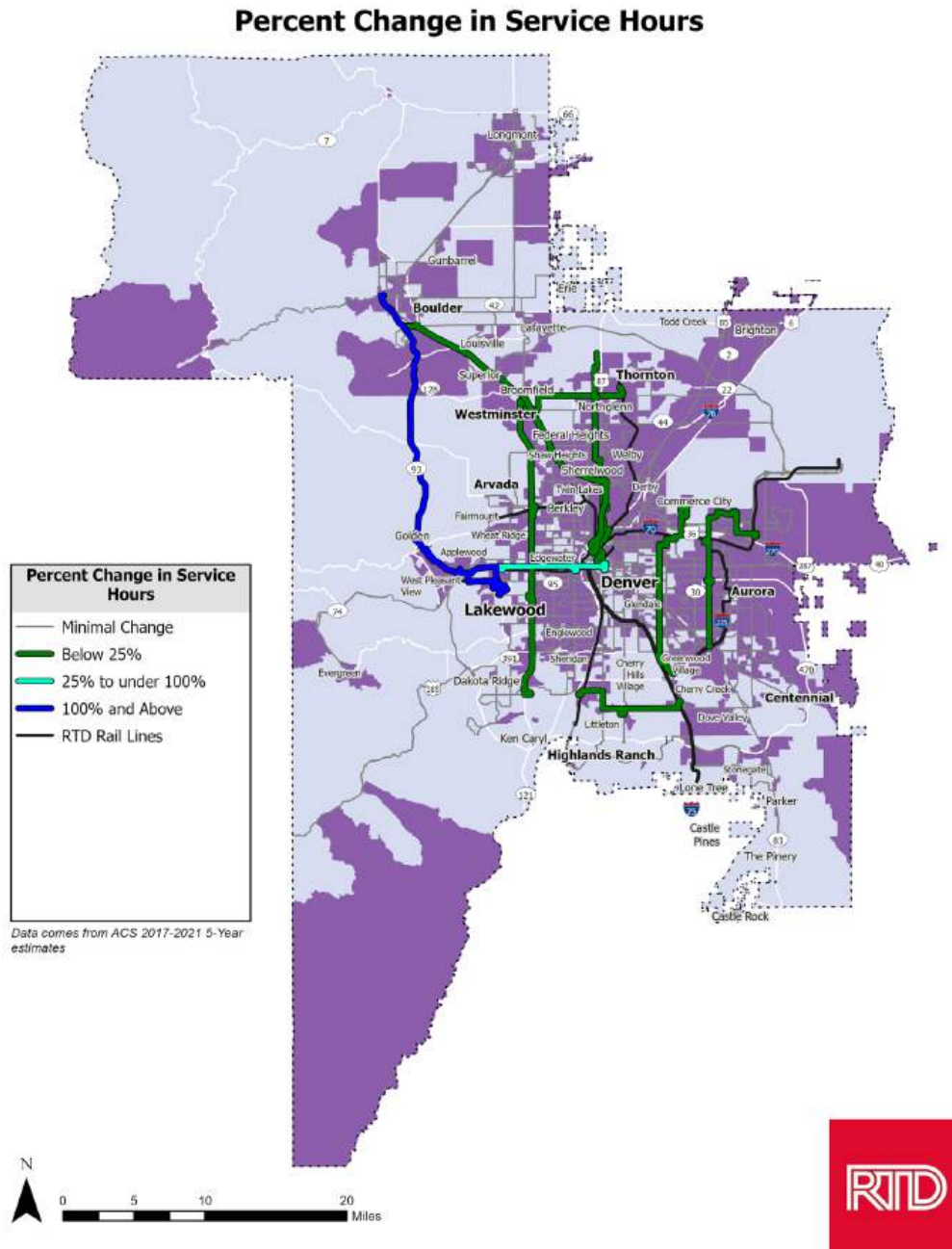


Figure 3. Depiction of route and segment changes by severity of change, January 2023 to May 2023

# Service Equity Analysis: September 2023

## Summary of Findings

The network changes proposed between May 2023 and September 2023 include modifications to service that include schedule adjustments, changes to summer schedules and trip availability, additional trips and longer service spans. The major service change increase was entirely invested in bus service. No major rail service changes or service reductions were included.

### Route-level Findings:

- Of the 26 total services with proposed changes, one had a potential disparate impact finding.
- Route GS has a potential disparate impact finding due to minority populations receiving 0.52% less of a benefit than non-minority populations.

Table 8 summarizes major service changes by the 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 8. Summary of major service changes by change type and impact*

Change Type	Number	Route	Potential DI?	Potential DB?	Service Change Pct
Service Reinstatement	GS	Boulder/Golden	Yes	No	100%

### Next Steps for Potential Disparate Impacts and Disproportionate Burden Findings

Given a potential disparate impact or disproportionate burden, RTD will evaluate whether an alternative would serve the same objectives and with a more equitable impact. Otherwise, RTD will either:

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

Alterations to the initial proposed September 2023 service changes<sup>4</sup> include the reinstatement of Route GS, which serves low-income populations at a rate higher than the district average.

In addition to the systemwide-level findings below, RTD's ongoing pandemic response, the substantial ridership decline, personnel impacts, resource allocation (human and capital), and recovery uncertainty serve as justification for maintaining the September 2023 service changes proposal.

<sup>4</sup> <https://www.rtd-denver.com/service-changes/september-2023>

# Service Equity Analysis: September 2023

## Systemwide-level Findings:

- Of the over 25,000 people with access to bus stops within the service area of the bus routes with a major service improvement (Route GS), low-income groups represented a higher share of the population than district averages, indicating targeted service increases to low-income populations
- When considering the demographics within the service areas of the bus route with a major service change and as a proportion to the district overall, low-income populations received a greater increase in service (were positively impacted more) compared to higher income populations
- Low-income areas benefited +1.19% more compared to higher-income areas
- Minority populations received a slightly lower increase in service (were positively impacted less) compared to non-minority populations
- Minority areas benefited 0.52% less compared to non-minority areas meeting the Disparate Impact threshold, therefore a system-level disparate impact was found with the proposed change



# Service Equity Analysis: September 2023

## Appendix A: Systemwide Service Changes

Change Type	Service Changes	
	Route	Description
<b>Modified Adjustments (8)</b>	16	In accordance with the RTD Board-approved System Optimization Plan (SOP), split the route into Routes 16 and 17: new 16 would operate between 16th/Lincoln and Oak Station, and new 17 would operate between Oak Station, Federal Station, and 10th/Washington in Golden.
	66	It is proposed to adjust the trip times to better serve shift times at Colorado Center for the Blind while also removing unproductive trips. Select very early/late trips will be eliminated.
	105	As outlined in the RTD Board-approved System Optimization Plan (SOP), this proposal truncates the southern portion of the route at Southmoor Station. This proposal also improves Sunday midday service to 15-minute frequency based on increased ridership which currently exceeds Saturday ridership levels.
	120E/W	It is proposed to reroute all Route 120 trips into Wagon Road Park-n-Ride, weekdays, Saturdays, and Sundays/Holidays, to allow for improved network connections and transit network access for the equity community.
	121	As outlined in the RTD Board-approved System Optimization Plan (SOP), implement 15-minute Saturday service south of Peoria Station, with every other trip continuing to the 40th Airport Station. Perform running time analysis aimed at improving on-time performance.
	GS	Per the System Optimization Plan, it is proposed to reinstate four northbound trips at 7:02 a.m., 8:22 a.m., 3:37 p.m. and 4:39 p.m., between Federal Center Station and Downtown Boulder Station. It is also proposed to reinstate four southbound trips at 7:10 a.m., 8:19 a.m., 4:36 p.m. and 5:13 p.m., between Downtown Boulder Station and Federal Center Station.
	E	Adjustments to E Line scheduled times to better coordinate with W Line operations. Minor schedule adjustments to trips from Evans Station to Denver Union Station between 3 a.m. and 12 p.m. for a few select trips for all service days.
	W	A running time analysis aimed at improving on-time performance on the W line is proposed.
<b>Seasonal Adjustments (12)</b>	11	Reinstatement of school trippers.
	20	Reinstatement of school trippers.
	24	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed. Additionally, reinstatement of school trippers.
	30	Reinstatement of school trippers, as well as the removal of stop #13700 in response to the move of the Denver Human Services office and to promote better stop spacing.
	51	Reinstatement of school trippers.
	65	In accordance with the RTD Board-approved System Optimization Plan (SOP), extend spans to improve service availability. Weekday service from 5 a.m. to

# Service Equity Analysis: September 2023

Change Type	Service Changes	
	Route	Description
		midnight and weekend service from 5 a.m. to 11 p.m. Reinstate seasonal school tripper service.
	73	As outlined in the RTD Board-approved System Optimization Plan (SOP), streamline the southern portion of the route to serve Belleview Station via Union Boulevard. Perform running time analysis and reinstate seasonal school tripper service. Service frequency improvements in the SOP will be added when workforce resources allow.
	225	Seasonal adjustment; returning weekday service frequency for fall/winter.
	DASH	Seasonal adjustment; returning weekday service frequency for fall/winter.
	JUMP	Seasonal adjustment; returning weekday service frequency for fall/winter.
	SKIP	Seasonal adjustment; returning weekday service frequency for fall/winter.
	NB	Seasonal adjustment; extend trips to Eldora Ski Resort to allow for service to the resort in winter.
<b><i>On-Time Performance Adjustment (6 Services)</i></b>	8	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	19	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	21	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	76	Schedule adjustments aimed at improving on-time performance are proposed.
	FF1	Schedule adjustments aimed at improving on-time performance are proposed.
	P	Schedule adjustments aimed at improving on-time performance are proposed.



## **Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores**

# Service Equity Analysis: September 2023

## Route GS – Golden / Boulder

Reinstatement of service between Federal Center Station and Downtown Boulder Station

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
New Access	<div>Creates access to an estimated 34,856 jobs</div> <div><div><div>Low/Medium Wage Jobs*</div><div>Jobs Held by Workers of Color*</div><div>Jobs Held by Hispanic/Latino Workers*</div></div><div><div><div>28%</div><div>14%</div><div>15%</div></div><div><div>45%</div><div>14%</div><div>18%</div></div></div><div><div>Route GS</div><div>District</div></div></div>	229	24	12	3	3	2	6	163	16

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2019.



January 27,  
2025



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# September 2023 Runboard Service Equity Analysis

Carl Green Jr., Director, Civil Rights

# Overview

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- § Proposed Service Changes Summary
- § Federal Transit Administration (FTA) Requirements
- § Title VI and Service Equity Analysis Overview
- § Title VI Policies
- § Methodology
- § Route and Network Analysis
- § Public Outreach Overview
- § Recommendation



# Proposed Service Changes Summary

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<b>Modified Services</b> (8 services)	16, 66, 105, 120E/W, 121, GS E Line, W Line
<b>Seasonal Adjustments</b> (12 services)	11, 20, 24, 30, 51, 65, 73, 225, DASH, JUMP, SKIP, NB
<b>On-Time Performance Adjustment</b> (6 services)	8, 19, 21, 76, FF1, P







# FTA Requirements for Service Changes

Proposed September 2023 Service Changes

# Title VI of the Civil Rights Act of 1964

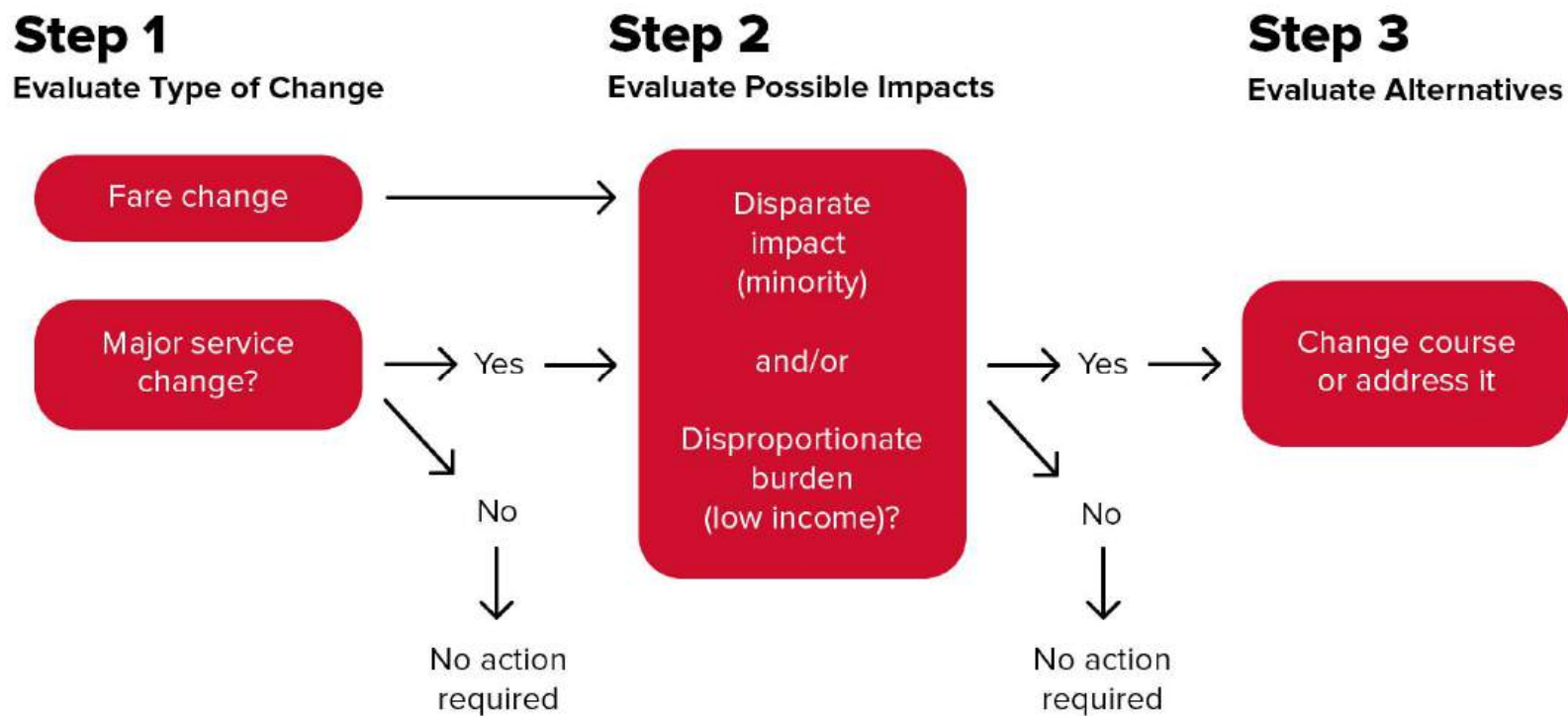
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"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

FTA Circular 4702.1B *Title VI Requirements and Guidelines* and RTD Title VI Program

# Title VI Equity Analysis Overview





# Title VI Policies

Major Service Change, Disparate Impact and Disproportionate Burden Policies

# Major Service Change Policy

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## Definition:

§ 25% + or - in the service hours of any route that would remain in effect for 12+ months

## Major Service Change Results:

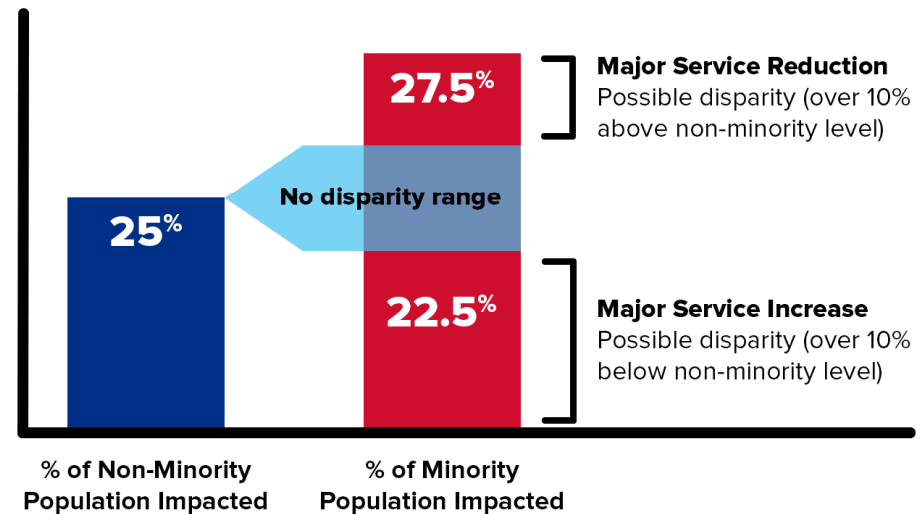
§ Increases – one out of 26 changes met the major service change threshold



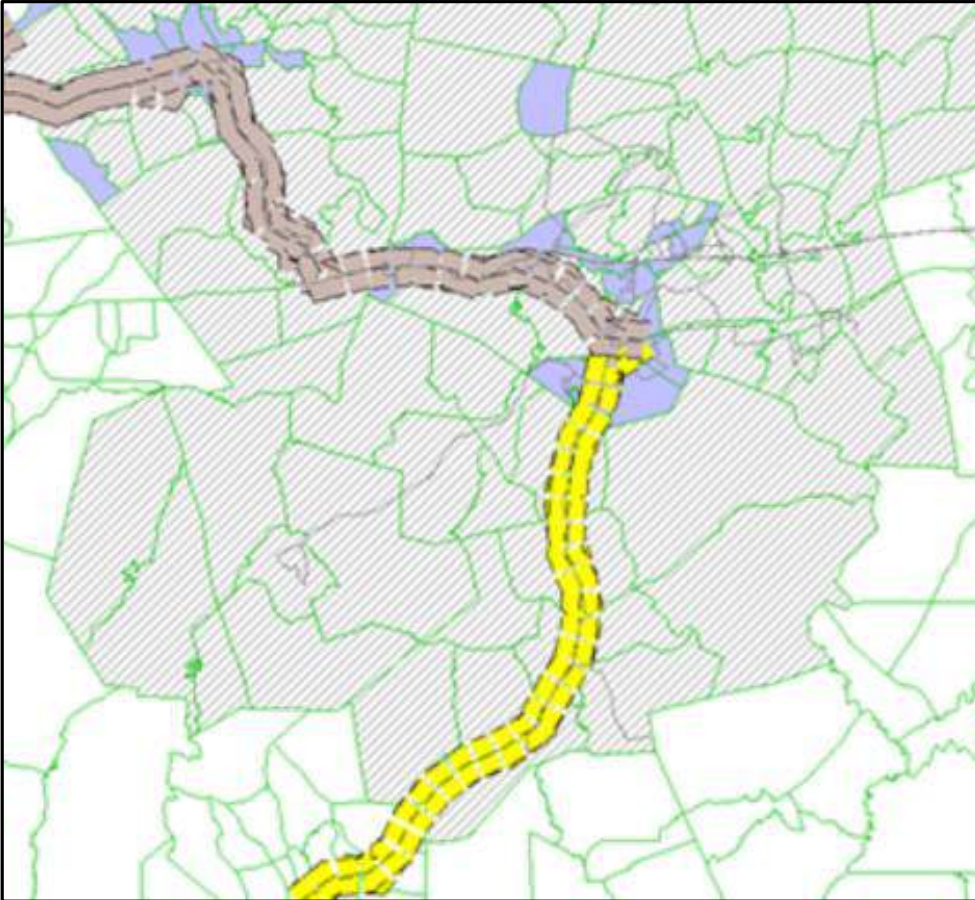
# Disparate Impact and Disproportionate Burden Policies

Title VI Policies  
=  
Thresholds to  
Evaluate Possible Impacts

## Testing for Disparate Impact at the System Level



Threshold Calculation: 10% of 25% (non-minority) = 2.5%



## Methodology

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1. Route-level analysis applied
2. Network analysis applied

¼-mile route buffer around a route



# Route Level Results

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## § Route GS

- Potential disparate impact
- No disproportionate burden



# Key Public Service Destinations Assessment

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**Retail and  
Convenience  
Stores**



**Schools  
PreK -  
College**



**Social  
Services**



**Senior  
Housing**



**Jobs**

## Key Public Service Destinations – Route GS

---

New Access	Total
Jobs	34,856
Grocers	179
Social Service Centers	24
Senior Housing	12
Academic Institutions	14

# Public Outreach Overview

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§ Three open houses held May 15-16, 2023

§ Community-based organizations/key public service destinations direct outreach

# Network Level Results

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§ Minority populations received slightly lower increase in service (were positively impacted less) compared to non-minority populations

- 0.52% less for minority groups (0.47% vs. 1.07% non-minority)
- Difference does meet Disparate Impact threshold (0.96%)

§ Low-income populations received a greater increase in service (positively impacted more) compared to non-low-income populations

- +1.19% more for low-income groups
- No Disproportionate Burden

# Conclusion

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- § Serve above-average low-income populations compared to service area average (14.3%)
- § GS reinstatement increases access to key public service destinations
- § Minor changes have positively impacted equity populations slightly more compared to non-equity populations
- § Title VI concerns are minimal at the route and network level



# Recommendation

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§ September 2023 Title VI service equity analysis approval





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# **RTD 2025-2028 Title VI Program**

## **Attachment S: Systemwide Fare Study and Equity Analysis**

DRAFT

# BOARD OF DIRECTORS REPORT

## Title VI Fare Equity Analysis

Committee Meeting Date:
July 11, 2023
Board Meeting Date:
July 25, 2023

### RECOMMENDED ACTION

For the Board of Directors to adopt the Title VI Fare Equity Analysis report for the Systemwide Fare Study and Equity Analysis recommended fare changes to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964 (Title VI).

### STAFF REPRESENTATIVE

Carl Green Jr., Director, Civil Rights

### PRESENTATION LENGTH

15 minutes

### BACKGROUND

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of financial assistance with instructions for achieving compliance with Title VI. In this circular, the FTA requires RTD to evaluate fare changes, prior to implementation, to determine whether those changes will have a disproportionately negative impact on minority or low-income populations. The FTA defines a fare change as an increase in the price of fare media, decrease in the price of fare media, creation of new fare media or the discontinuance of current fare media. Fare media are defined as forms of payment for transit service (i.e., cash fare, paper pass, etc.). The Systemwide Fare Study and Equity Analysis includes proposed fare changes that meet this definition. Thus, an analysis is required to be brought before the Board for approval. The complete Title VI Fare Equity Analysis report is included in Attachment A.

#### RTD's Title VI Fare Equity Analysis Policies

Pursuant to FTA Circular 4702.1B Chapter IV.7, RTD must establish a Disparate Impact Policy and a Disproportionate Burden Policy. On May 24, 2022, the Board approved and adopted the Title VI Program Update and required policies. 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, which difference 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 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, which difference 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 United States 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.

## **DISCUSSION**

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

Staff presented the draft recommendation for fare structure changes and the draft Title VI fare equity analysis at the April 11, 2023, Finance and Planning Committee meeting (see attached Board materials). Subsequently, staff released the draft fare equity analysis to the public for comment in tandem with the draft recommendation release. There were no associated changes made to the draft recommendation following the final public comment period.

The following discussion is divided into two sections:

- Final draft Title VI fare equity analysis of proposed fare changes
- Final public outreach and engagement efforts

### Title VI Fare Equity Analysis of Proposed Fare Changes

In accordance with Title VI and FTA Circular 4702.1B, RTD conducted an equity analysis of the proposed fare changes to ensure that they do not unfairly impact people of color and low-income populations. The changes proposed as part the Systemwide Fare Study and Equity Analysis, include a fare restructuring and price reduction, establishment of a Transit Assistance Grant Program, introduction of a Bulk Purchase Program, establishment of a Semester Pass Program, introduction of fare capping and expansion of eligibility for RTD's low-income fare discount program (LiVE).

The analysis does not consider fare changes to Access-a-Ride services, which provide complementary paratransit services within the RTD service area, as they are not subject to the current Title VI evaluation requirements. The introduction of expanded retail opportunities for the MyRide fare collection system beyond the four RTD Sales Outlets is not included in this analysis as RTD is still in the process of procuring retail expansion opportunities. The introduction of a substantially expanded set of retail opportunities would require a future Title VI review.

Lastly, this analysis does not include the Zero Fare for Youth pilot program. Per the FTA, promotional fare reductions or pilots are excluded from being subject to a fare equity analysis if the pilot does not last longer than six months. On June 22, 2023, FTA officials approved RTD's request to extend the pilot beyond the six-month period permitted under current federal regulation to a 12-month period, through the end of the 2023-2024 school year and concluding August 31, 2024. If Zero Fare for Youth is sought to be made permanent beyond the pilot period, a fare equity analysis is required to be completed prior to the permanent fare change and will need Board approval.

#### **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 indicating whether minority and/or low-income customers are disproportionately more likely to use the mode of service, payment type or payment media that would be subject to the fare change.

Based on the Federal Guidance and the RTD 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 all users; and
- iv. Compare the differences for each particular fare media between low-income users and all users.

A fare equity analysis compares the current fare to the proposed fare and calculates the absolute change as well as the percent change. Utilizing the Disparate Impact and Disproportionate Burden threshold, a determination is 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 the overall population, including non-minority or non-low-income populations.

#### **Summary of Findings:**

- **Disparate Impact Analysis** – the analysis found that minority customers are expected to experience a slightly smaller average fare decrease compared to all customers. While both groups experience a decrease in their average fare, all customers are expected to benefit somewhat more than minority customers as a result of the proposed fare changes. However, the fare changes do not represent a disparate impact on minority customers as the percentage point difference in percentage change in average fare from the proposed fare changes does not exceed RTD's 5% threshold. Therefore, the proposed fare changes do not present a disparate impact.
- **Disproportionate Burden Analysis** – the analysis found that low-income customers are expected to experience a slightly smaller average fare decrease compared to all customers. While both groups experience a decrease in their average fare, all customers are expected to benefit somewhat more than low-income customers as a result of the proposed fare changes. However, the fare changes do not represent a disproportionate burden on low-income customers as the percentage point difference in percentage change in average fare from the proposed fare changes

does not exceed RTD's 5% threshold. Therefore, the proposed fare changes do not present a disproportionate burden.

#### **Conclusions:**

The average fare analysis uncovered no Title VI equity concerns using RTD's Board-adopted Title VI Policies. While changes to some fare payment types would result in a greater percentage change for some populations, the aggregate, systemwide differences between all customers and minority customers and between all customers and low-income customers were within the 5% policy threshold. The proposed fare changes are expected to benefit minority customers and low-income customers to a lesser degree than all customers, but the difference in benefits does not exceed 5% on a systemwide basis. As such, no mitigations are recommended to proceed with the implementation of the proposed fare changes based on the average fare analysis.

Although there were no disparate impacts or disproportionate burdens identified in the Title VI fare equity analysis, RTD has integrated equity focused improvements and targeted programs benefitting minority and low-income populations as part of the draft recommendation. This includes LiVE expansion, Transit Assistance Grant program, Semester Pass opt-in program for post-secondary educational institutions and the zero fare for youth pilot. Additionally, RTD has planned efforts to expand access to MyRide retail opportunities as well as increase outreach activities to promote the LiVE Program through partnerships with community-based organizations.

#### **Final Public Outreach and Engagement Efforts**

Pursuant to FTA Circular 4702.1B Chapter III.5-6, RTD must promote inclusive public participation, provide meaningful access to limited English proficient persons, and perform appropriate methods to facilitate the public comment and community engagement process. The final public engagement activities and public hearings comport with the federal guidelines and are illustrated in Section 7 of the Title VI Fare Equity Analysis Report.

#### **FINANCIAL IMPACT**

The adoption of the Title VI Fare Equity Analysis will not result in any direct or foreseeable financial impacts.

#### **ATTACHMENTS:**

- Attachment A – Title VI Fare Equity Analysis Recommended Action July 11, 2023 (PPTX) (PPTX)
- Attachment B - Title VI Fare Equity Analysis Report (PDF)

<b>RESULT:</b>	<b>ADOPTED BY CONSENT VOTE [UNANIMOUS]</b>
<b>MOVER:</b>	Bob Broom, Director, District F
<b>SECONDER:</b>	Kate Williams, Director, District A
<b>AYES:</b>	Bouquet, Broom, Buzek, Catlin, Davidson, Dishell, Guissinger, Guzman, Harwick, Rosenthal, Ruscha, Sloan, Tisdale, Whitmore, Williams


Prepared by:

Carl Green Jr., Director, Civil Rights

Approved by:

  
Brian Welch, Acting AGM, Planning 6/28/2023

Authorized by:

  
Debra A. Johnson, General Manager and CEO 7/5/2023



January 27, 2025



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# Title VI Fare Equity Analysis

Carl Green Jr., Director, Civil Rights

# Overview

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- Proposed Fare Changes Summary
- Federal Transit Administration (FTA) Requirements
- Title VI and Fare Equity Analysis Overview
- Title VI Policies
- Methodology
- Fare Equity Analysis Results
- Final Public Outreach Overview
- Recommendation





# Proposed Fare Changes Summary

# Proposed Fare Changes Equity Analysis

---

- Fare Restructuring and Price reduction
- Transit Assistance Grant Program
- Bulk Purchase Program
- Semester Pass Program
- Fare Capping
- Low-Income Fare Discount Program Eligibility Expansion

*\* Does not include Access-a-Ride fare changes, Zero Fare for Youth pilot or expanded MyRide retail opportunities*





# FTA Requirements for Fare Changes

# Title VI of the Civil Rights Act of 1964

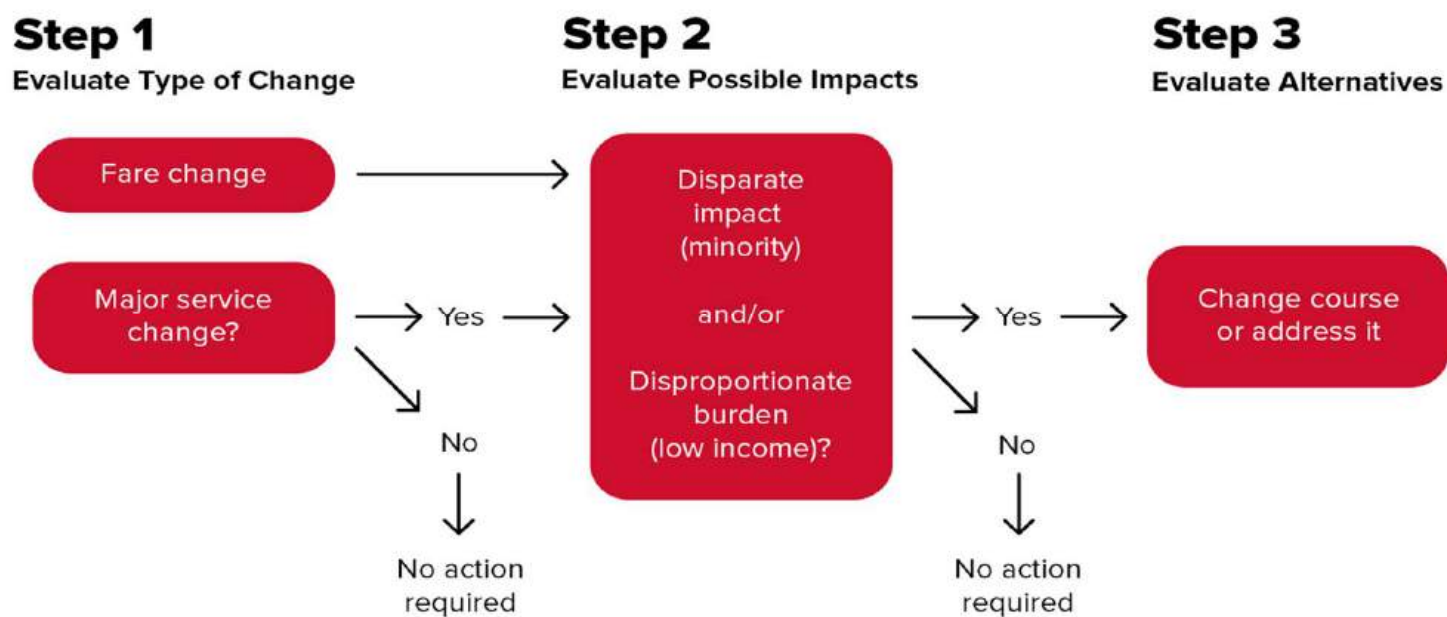
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"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

FTA Circular 4702.1B *Title VI Requirements and Guidelines* and RTD Title VI Program

# Title VI Equity Analysis Overview



Minority and Low-Income = Equity Populations





# Title VI Policies

# Fare Disparate Impact and Disproportionate Burden Policy

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## Definition

- *Per RTD policy, the difference in the adverse effects absorbed by minority and 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*

# Methodology: Average Fare Analysis

---

- Fare Equity Analysis compares current fare to proposed fare and calculates absolute change and percent change
- Average Fare Analysis evaluates change experienced by all customers compared to change experienced by minority customers and low-income customers
- Customer Satisfaction Survey data and ticket sales are used to determine fare usage rates and customer demographics
- RTD policy thresholds used to assess whether proposed changes result in adverse effects disproportionately affecting minority or low-income customers, or result in disproportionate benefits for all customers



# Methodology: Average Fare Analysis Example

## Thresholds to Evaluate Possible Impacts

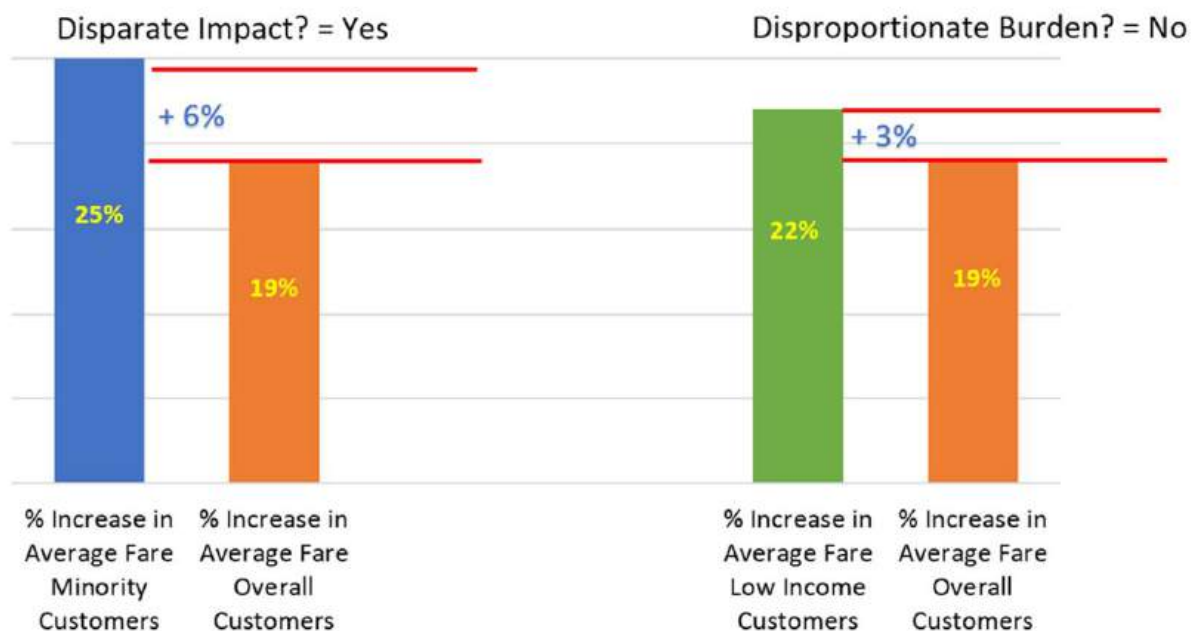
### Difference from Overall Customers

Minority Change = 6% which is >5%

**Disparate Impact**

Low-Income Change = 3% which is <5%

**No Disproportionate Burden**





# Fare Equity Analysis Results

# Fare Equity Analysis Results

- All customers experience 25% average fare decrease, compared to minority customers, who experience 23% average fare decrease

All Customers			Minority Customers		
Number of Boardings	Current Average Fare	Proposed Average Fare	Number of Boardings	Current Average Fare	Proposed Average Fare
44,855,331	\$1.41	\$1.05	16,515,545	\$1.26	\$0.97
% Change in Average Fare		-25.4%	% Change in Average Fare		-23.1%
Difference between Minority Customers and All Customers					2.3%

- **Results:** No Disparate Impact on minority customers



# Fare Equity Analysis Results

- All customers experience 25% average fare decrease, compared to low-income customers who experience 22% average fare decrease

All Customers			Low-Income Customers		
Number of Boardings	Current Average Fare	Proposed Average Fare	Number of Boardings	Current Average Fare	Proposed Average Fare
44,855,331	\$1.41	\$1.05	15,866,474	\$1.08	\$0.84
% Change in Average Fare		-25.4%	% Change in Average Fare		-22.0%
Difference between Low-Income Customers and All Customers					3.4%

- **Results:** No Disproportionate Burden on low-income customers





# Fare Equity Analysis Findings

---

- No disproportionate impacts on minority/low-income customers
- Findings help identify targeted areas for further improvement
  - Expanded access to MyRide retail opportunities
  - Increased outreach activities to promote LiVE Program, including community partnerships
- Minority/low-income customers' average fare paid remains lower than systemwide average fare
- Minority/low-income customers across all fare types experience average fare decrease except low-income Neighborhood EcoPass program customers





# Final Public Outreach and Engagement Efforts

# Final Public Engagement Overview

**RTD FARE STUDY**  
**& EQUITY ANALYSIS**

**PUBLIC COMMENT  
ENGAGEMENT**  
APRIL 2023 – MAY 2023





# Recommendation

# Recommendation

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- Approve Title VI fare equity analysis for fare structure changes



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# Systemwide Fare Study and Fare Equity Analysis

## FINAL Draft Title VI Fare Equity Analysis

Final Draft: July 11, 2023

Prepared by Four Nines Technologies





# Table of Contents

1 Introduction.....	4
2 Overview of Proposed Fare Changes.....	5
3 Title VI Policies.....	8
3.1 Disparate Impact and Disproportionate Burden Policies.....	8
3.1.1 Fare Changes .....	9
3.1.2 Adverse Effects .....	9
4 Fare Equity Analysis Methodology .....	10
4.1 Average Fare Analysis.....	11
4.1.1 Demographic Data.....	12
4.1.2 Assumptions .....	12
5 System Ridership Demographics Overview.....	16
5.1 Ethnicity Assumptions .....	16
5.2 Income Assumptions .....	17
5.3 Ridership Demographics.....	18
6 Fare Change Proposal.....	19
6.1 Overview of Proposed Fare Changes.....	19
6.1.1 Fare Structure.....	19
6.1.2 Fare Discounts .....	20
6.1.3 Fare Capping.....	20
6.1.4 Fare Pricing.....	21
6.1.5 LIVE Eligibility, Fare Products and Discounts.....	22
6.1.6 Other Programs .....	22
Transit Assistance Grant Program .....	23
Bulk Purchase Program.....	23
Semester Pass.....	23
6.1.7 Pass Program .....	24
Business EcoPass .....	24
Neighborhood EcoPass.....	25
CollegePass .....	25
6.1.8 Additional Fare Guidance .....	26
Zero Fare for Youth Pilot Program.....	26

LiVE Access Expansion .....	26
Expanded MyRide Retail Opportunities .....	27
6.2 Pricing, Payment and Media Changes .....	27
6.3 Media Distribution and Sales Outlets Changes .....	30
6.4 Electronic Fare Media Policy Changes .....	32
7 Fare Proposal Outreach .....	37
7.1 Public Outreach Overview .....	37
Demographic Data .....	39
Demographic Data At-a-Glance .....	39
7.2 Summary of Public Comments .....	39
Fare Structure .....	39
Passes and Pass Programs .....	40
Zero Fare for Youth .....	40
Additional Passes and Programs .....	40
LiVE Expansion Outreach Plan .....	41
7.3 Changes to Proposal .....	41
7.4 Board Adopted Fare Change .....	41
8 Average Fare Analysis Findings .....	42
8.1 Average Fare by Fare Level and Fare Payment Type .....	42
8.2 Average Fare Analysis Results .....	45
8.2.1 Key Findings .....	48
8.2.2 Overview of Overall Findings .....	49
9 Cumulative Findings and Mitigations .....	51
10 Next Steps .....	52
Appendix A: Detailed Average Fare Analysis Tables .....	53
Appendix B: Draft 2024-2026 LiVE Income-Based Discount Fare Program Communications and Outreach Plan ..	65
Appendix C: Public Comments Submitted .....	73

# 1 Introduction

Title VI of the Civil Rights Act of 1964 (“Title VI”) ensures that “no person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” The Regional Transportation District (“RTD” or “The District”) has committed to the Federal Transit Administration (FTA) Title VI objectives set forth in Circular 4702.1B, ensuring that FTA-assisted benefits and related services are made available and are equitably distributed without regard to race, color or national origin.

This analysis of the fare changes proposed as part the recent Systemwide Fare Study and Equity Analysis that includes a fare restructuring and price reduction, introduction of fare capping and expansion of eligibility for RTD’s low-income fare discount program (“LiVE”) was prepared in conformity with the guidelines laid out in Chapter IV and Appendix K of FTA Circular 4702.1B, Service and Fare Equity Analysis Questionnaire Checklist.

The Fare Equity Analysis described herein assesses whether the proposed fare changes for fixed-route services would result in either Disparate Impacts on minority customers or a Disproportionate Burden on low-income customers. The proposed fare changes being presented by RTD are the basis of this Fare Equity Analysis. The analysis does not consider fare changes to Access-a-Ride services, which provide complementary paratransit services within the RTD service area, as they are not subject to the current Title VI evaluation requirements.

The Average Fare Analysis conducted as part of this Fare Equity Analysis found that the proposed fare changes would not result in a Disparate Impact on minority customers or Disproportionate Burden on low-income customers. Given that there were no findings of Disparate Impact or Disproportionate Burden, no mitigations are needed to proceed with the implementation of the proposed fare changes.

## 2 Overview of Proposed Fare Changes

In 2021, the Regional Transportation District (RTD) initiated the Systemwide Fare Study and Equity Analysis (the study) in response to feedback from customers and stakeholders that RTD fares are expensive and difficult to understand. To address those issues, RTD launched the study to examine its fares holistically, taking into consideration the three study goals of equity, affordability and simplicity. These goals have provided direction for the overall study, guided the development and evaluation of alternatives and will be used to determine success.

RTD has taken a customer-centric approach to the study, with opportunities for customers as well as stakeholders and community members to help shape the direction of the study. The study has included three distinct phases of engagement to gather customer and community input and share updates on progress. The first phase, held in spring 2022, was undertaken to identify challenges with the current fare system and to receive input on fare structure preferences. The second phase, held in summer 2022, provided an overview of the customer and stakeholder feedback heard during the first phase, as well as the conceptual fare options that were under consideration and in the process for evaluating them. Phase 3 was conducted in fall 2022 to receive feedback on the two fare structure alternatives that were developed and being considered. Final public engagement and public hearings will be held between April 2023 and June 2023.

All of the engagement phases included customer and community meetings, three feedback panels aimed at larger groups of constituents, focus groups with community-based organizations and a number of other methods of providing feedback including two online surveys, a study website and social media posts. To ensure a community-driven process, the study focused on Title VI and historically underrepresented populations. Partnerships were formed with six community-based organizations to assist in reaching their respective clients, and included specific focus groups with their clients.

The proposed alternative was developed based on feedback received on the two fare structure alternatives in the third phase. The proposed fare changes include a number of structural and pricing changes to RTD's fares, as well as changes to current pass programs, new pass programs and technological changes to fare payment, including the introduction of fare capping. The proposed alternative does not include changes that were implemented prior to July 2022 and examined under a separate Fare Equity Analysis. Tables 1-4 summarize the proposed fare changes, which include fare structure and pricing changes, LiVE Program changes, pass program changes, and implementation of a Transit Assistance Grant Program and a College Semester Pass. More information about the proposed fare changes is found in Section 6.

**Table 1: RTD Full Fare Structure and Pricing Changes**

	Current Full Fare			Proposed Full Fare		
	Local	Regional	Airport	Local	Regional	Airport
<b>3-Hour Pass</b>	\$3.00	\$5.25	\$10.50	\$2.75		\$10.00
<b>Day Pass</b>	\$6.00	\$10.50	\$10.50	\$5.50		\$10.00
<b>10-Ride Ticket Book</b>	\$28.00	\$50.50	N/A	\$27.50		N/A
<b>Monthly Pass</b>	\$114.00	\$200.00	\$200.00	\$88.00		

See Table 8 in Section 6 for proposed fare changes for all fare payment types and for discounted fare payment types.

**Table 2: RTD Fare Structure, Pricing and Discount Changes**

Fare Structure Changes	
New/Change	Elimination
<ul style="list-style-type: none"> <li>Lowered 3-Hour, Day Pass and Monthly Pass pricing.</li> <li>Introduction of daily (service day) and monthly (calendar) fare capping for full fare customers, seniors, individuals with disabilities, LiVE customers and youth using MyRide stored value with MyRide Barcode in the MyRide App or a new MyRide Smart Card.</li> <li>Lowered Monthly Pass price, with the breakeven multiple for the full fare Monthly Pass reduced from 38 times the price of a 3-Hour Pass to 32 times the price of a 3-Hour Pass, resulting in an \$88.00 Monthly Pass and monthly fare cap.</li> <li>One Monthly Pass price for customers paying discounted fares with an increased discount on the Monthly Pass to 70%, effectively lowering the breakeven multiple for Monthly Pass and monthly fare cap for seniors, individuals with disabilities, Medicare recipients and LiVE customers to 20 times the 3-Hour Pass price (\$27.00).</li> <li>One Monthly Pass valid for travel anywhere in the service area including the Airport; no higher price pass required for Regional and Airport customers. For customers using fare capping through MyRide Barcode in the MyRide App or MyRide Smart Card, Local and Airport fares paid will contribute towards the \$88.00 calendar monthly fare cap.</li> </ul>	<ul style="list-style-type: none"> <li>Simplified fare structure by removing the Regional fare category. Customers would pay a flat fare for all travel except for trips originating or ending at Denver International Airport.</li> <li>For customers paying discounted fares, a single price fare level for all travel, including trips originating or ending at Denver International Airport.</li> <li>Elimination of the discount on 10-Ride Ticket Books for full fare customers, seniors, individuals with disabilities and Medicare recipients. Existing LiVE and youth 10-Ride Ticket Books do not include a discount, so no changes are proposed to these customers' 10-Ride Ticket Books.</li> <li>Elimination of mobile 10-Ride Ticket Books.</li> </ul>

Table 3: LiVE Program Changes

LiVE Program Changes	
New/Change	Elimination
<ul style="list-style-type: none"> <li>Increased income threshold eligibility from 185% to 250% of the federal poverty level.</li> <li>Introduction of LiVE paper and mobile Monthly Passes and monthly fare capping for LiVE customers using MyRide Barcode in the MyRide App or new MyRide Smart Card.</li> <li>Increased LiVE discount from 40% to 50% on 3-Hour Pass and Day Pass to align with fares for seniors, individuals with disabilities and Medicare recipients. 70% discount provided on new LiVE Monthly Pass.</li> </ul>	<ul style="list-style-type: none"> <li>Elimination of In-District address requirement.</li> </ul>

Table 4: Other Program Changes

Other Pass Programs
New/Change
<ul style="list-style-type: none"> <li>Establishment of a Transit Assistance Grant Program to provide full fare 10-Ride Ticket Books to organizations and agencies that serve populations with immediate transit needs.</li> <li>Introduction of a 10% discount on bulk purchases totaling \$1,500 or more per transaction, purchased through a Bulk Purchase Program.</li> <li>Introduction of a Semester Pass for smaller colleges or community colleges, offering a 20% discount on the full fare Monthly Pass price for each month of the school term.</li> <li>Establishment of 2-year fixed Business EcoPass pricing. Consolidation of suburban and major transit center Service Level Areas (SLAs) and consolidation of all business size categories to a single size category. Utilization-based pricing for all trips based on the full fare, Local fare rate. Decreased contract minimums to reduce barriers to participation.</li> <li>Establishment of 2-year fixed Neighborhood EcoPass (NECO) contracts. Utilization-based pricing for all trips based on the full fare, Local fare rate. Decreased contract minimums to reduce barriers to participation.</li> <li>Establishment of 2-year fixed CollegePass contracts. Utilization-based pricing for all trips based on the full fare, Local fare rate. Decreased contract minimums to reduce barriers to participation.</li> </ul>

## 3 Title VI Policies

Title VI of the Civil Rights Act of 1964, Section 601 states:

*“No persons 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.”*

It is RTD’s objective to avoid, minimize or mitigate disproportionately high and adverse impacts on minority and low-income populations. As a recipient of financial assistance from the FTA, RTD is required to comply with Title VI of the Civil Rights Act of 1964 and its own Title VI Program adopted in accordance with same by evaluating major service and fare changes at the planning and programming stages to determine whether those changes have discriminatory impacts, including Disparate Impacts on minority populations and/or Disproportionate Burdens on low-income populations.

According to the Federal Department of Transportation, equity in the provision of transit service is "providing equal levels of service to minority and non-minority residents of the urbanized area. Levels of service, in turn, are defined in terms of capital allocation and accessibility." <sup>1</sup> The metrics of discrimination that could be monitored for disparate treatment include fare structures that could consistently cause minority-group customers to bear a higher fare burden than the overall riding public, access to specialized fare media, or methods of communication to populations with Limited English Proficiency. However, a Title VI Equity Analysis should not replace good program planning, which should be an on-going process that considers equity among other factors when designing fare changes, service changes, or discretionary policies and programs.

Per FTA Circular 4702.1B Chapter IV.7, RTD must establish a Disparate Impact Policy and a Disproportionate Burden Policy for evaluating fare change proposals for equity and compliance with Title VI. As part of the 2022 Title VI Program Update, RTD maintained their 5% threshold for determining a Disparate Impact or Disproportionate Burden of a fare modification as established in RTD’s Fare Disparate Impact Policy and Disproportionate Burden Policy. The Board of Directors adopted the Title VI Policies concurrent with the adoption of their 2022 Title VI Program Update. The policies used by RTD for analysis of proposed fare changes is found in Section 3.1.

### 3.1 Disparate Impact and Disproportionate Burden Policies

The FTA requires that transit agencies assess whether a proposed fare change or major service change would have a “Disparate Impact” on minority populations, or “Disproportionate Burden” on low-income populations, under Title VI of the Civil Rights Act of 1964, Title 49 C.F.R. Section 21.5(b)(2) and (b)(7), and Appendix C to Title 49 C.F.R. part 21. Pursuant to FTA Circular 4702.1B, FTA requires public transit agencies operating 50 or more fixed route vehicles in peak service and located in urbanized areas of 200,000 or more people, to clearly establish, with input through a public engagement process, threshold definitions for measuring Disparate Impacts and Disproportionate Burdens.

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<sup>1</sup> Transit Cooperative Research Program, Legal Research Digest: “The Impact of Civil Rights Litigation Under Title VI and Related Laws on Transit Decision Making”, TCRP Project J-5, Washington, D.C. June 1997



RTD's Fare Disparate Impact and Disproportionate Burden policies establish threshold standards for evaluating the equity impacts and the distribution of adverse effects caused by any fare change or major service change. These thresholds enable RTD to determine whether minority and low-income customers would be disproportionately impacted by the adverse effects of the proposed changes and by inference, whether the overall ridership would disproportionately benefit from the proposed changes when compared to the protected populations (minority and low-income). These thresholds are based on the cumulative impact of the proposed service or fare change.

The policies and their applicable analyses and 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, which 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**

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, which 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.

### 3.1.1 Fare Changes

RTD defines a fare change as an increase in the price of fare media, decrease in the price of fare media, creation of new fare media or the discontinuance of current fare media. Fare Media are defined as forms of payment for transit service (i.e., cash fare, paper pass, etc.).

Based on federal guidance, prior to adopting a fare change, RTD must conduct a fare equity analysis and analyze specific elements of the proposed structure and changes to fare media along with the recommended pricing schema, to determine whether the changes would result in impacts that exceed the threshold established by the policies. As referenced in C4702.1B, some fare changes are excluded from being the subject of a Fare Equity Analysis, such as instances where all passengers ride free such as "Spare the Air Days", or temporary fare reductions that are mitigating measures for other activities such as construction, or promotional fare reductions, so long as the temporary fare reduction or promotional reduction does not last longer than six months.

### 3.1.2 Adverse Effects

For the fare equity analysis, adverse effects include an increase in cost or a reduction in accessibility of fare media. Benefits include a decrease in cost, increase in discounts for certain fare types or customer populations, or increase in accessibility of fare media. The results of analysis provided in this report uses RTD's adopted thresholds for determining Disparate Impacts and Disproportionate Burdens.

## 4 Fare Equity Analysis Methodology

For proposed changes that would increase or decrease the fares on the entire system, or on certain transit modes, or by fare payment type or fare media, RTD shall analyze any available information generated from passenger surveys indicating whether minority and/or low-income customers are disproportionately more likely to use the mode of service, payment type or payment media that would be 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 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.<sup>2</sup> In accordance with RTD Title VI Policies, the determination of a Fare Disparate Impact or Disproportionate Burden is based on the difference in the impacts experienced by minority and low-income persons as a result of any fare price change or the average of multiple fare changes compared to the impacts experienced by the overall ridership.

Based on the Federal Guidance and the RTD 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 all users; and
- (iv) Compare the differences for each particular fare media between low-income users and all users.<sup>3</sup>

A fare equity analysis compares the current fare to the proposed fare and calculates the absolute change as well as the percent change. Utilizing the Disparate Impact and Disproportionate Burden threshold, a determination is 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 the overall population, including non-minority or non-low-income populations.

Throughout the document, the following definitions are used:

- Fare payment type is defined as fare product (e.g., Day Pass, Monthly Pass) and fare media on which it is distributed (i.e., cash, paper, electronic)
- Fare levels include Local, Regional and Airport. Whether the Local or Regional fare level applies is based on the number of zones traveled on rail and distance traveled on bus. The Airport fare level applies to any trip to or from Denver International Airport, regardless of distance, on the A Line, SkyRide or Express bus.
- Fare-paying rider categories include full fare customers, seniors 65+, individuals with disabilities, Medicare recipients, LiVE customers and youth aged 19 and younger.

This report provides the results of the **Average Fare Analysis** undertaken to assess the effects of the proposed fare changes on the average fare paid per boarding to determine whether minority or low-income customers are disproportionately adversely impacted by the changes or whether overall customers disproportionately benefit from the changes.

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<sup>2</sup> Federal Circular: C4702.1B Chap IV-10

<sup>3</sup> Federal Circular C4702.1B Chap. IV-19

## 4.1 Average Fare Analysis

The Average Fare Analysis for the proposed changes was undertaken using ticket sales and revenue data from calendar year 2021, when ridership was continuing to recover from the COVID pandemic. Ridership by fare payment type was estimated based on ticket sales and revenue data as well as transfer and fare product usage rates developed using the 2017 RTD Customer Satisfaction Survey (2017 CSS). 2021 ticket sales data were used to determine electronic fare adoption for 3-Hour and Day Pass customers in order to assess the impacts of the introduction of fare capping on the average fare for overall, minority and low-income customers. 2017 CSS demographic data combined with 2021 ticket sales data were used to estimate the potential increase in LiVE ridership due to the income eligibility expansion for the LiVE Program.

The Average Fare Analysis excludes free rides as ridership data for free rides are not available. Free rides include Access-a-Ride customers on fixed-route and FlexRide services, children ages 5 and younger traveling with a fare-paying adult, active duty members of the U.S. military and other customers on the RTD fare exemption list. The Average Fare Analysis also excludes free rides taken on the MallRide. Further, this Fare Equity Analysis does not consider the impacts of the proposed changes to Access-A-Ride fares on the average fare paid as paratransit services are not subject to the current Title VI evaluation requirements.

The 2019 RTD Customer Satisfaction Survey (2019 CSS) was used for the customer demographic data. While the 2019 CSS sample size was smaller than the 2017 CSS, it provides demographic data on electronic fare adoption, which were not available in the 2017 CSS.

The only ridership changes considered in the Average Fare Analysis are those associated with the changes in the average fare per boarding due to pricing changes, introduction of fare capping and the income eligibility expansion for the LiVE Program to include household income up to 250% of the federal poverty level. The Average Fare Analysis does not assume any ridership changes due to application of fare elasticities. Fare elasticity is a measure of rider sensitivity to changes in fare rates and the resulting change in ridership behavior. Elasticity assumptions are essential to modeling anticipated ridership and fare revenue impacts from fare policy changes, but is often excluded from fare equity analyses. Fare equity analyses seek to understand the average fare experienced by a segment of customers prior to a fare change and after a fare change, in order to determine the % change in average fare. This calculation becomes unnecessarily complex when a customer segment is anticipated to attract new customers to the system or from other fare products. Therefore, fare elasticity is excluded in order to compare the average fare impacts of the fare changes on the same segment of customers after the change in pricing and policies.

The Average Fare Analysis does not assume any increase in electronic MyRide fare adoption as RTD continues to explore expanded retail opportunities for its electronic MyRide fare collection system at the time of the preparation of this report. Introduction of expanded retail opportunities for MyRide beyond the four RTD Sales Outlets that are currently open will improve access for unbanked and underbanked customers to load cash to their accounts. Based on the 2019 CSS data, non-minority and non-low-income customers disproportionately use electronic fare media (MyRide stored value and RTD Mobile Tickets App at the time of the 2019 CSS) at a higher rate compared to minority and low-income customers. If RTD were to introduce a set of expanded MyRide retail opportunities to increase access for customers to load cash to their accounts, MyRide adoption is presumed to increase for minority and low-income customers. Because the Average Fare Analysis is based on 2019 CSS data and does not assume any increase in electronic MyRide fare adoption, the Average Fare Analysis may understate

the benefits of fare capping for minority and low-income customers as it assumes that overall customers will disproportionately benefit from fare capping compared to minority and low-income customers.

#### 4.1.1 Demographic Data

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.

In addition to the 2019 CSS, the 2020 LiVE Program Survey was used for demographics for LiVE customers. RTD launched its LiVE Program in July 2019, after the 2019 CSS was conducted. Unlike the 2019 CSS that was conducted onboard vehicles, the 2020 LiVE Program Survey was conducted via email and US mail. RTD invited the 6,579 customers whose applications were approved within the 12 months leading up to the survey to participate. After removing duplicates, 886 surveys were included in the final LiVE Program Survey data set.

RTD's 2017 CSS was considered for use in the analysis instead of the 2019 CSS, given the much larger sample of completed surveys (9,936). However, the survey included limited customer response data on electronic fare adoption due to the timing of when the survey was conducted (May 2017) and when electronic fares launched – MyRide Stored Value (May 2017) and RTD Mobile Tickets App (November 2017).

While the demographics of transit ridership may have changed due to COVID, the 2019 CSS provides the most comprehensive and recent survey data available of systemwide demographics, and likely provides a conservative assessment of the impacts of the proposed fare changes on minority and low income customers. Evidence from a number of transit agencies across the US suggest that the share of minority and low-income customers has increased as a result of the COVID-19 pandemic. While RTD has no current survey data to indicate whether that is true in the RTD service area, if one assumes it to be true then this current Fare Equity Analysis (with an assumed lower share of minority and low-income customers) would show less beneficial differences in average fare between minority and low-income customers and the system overall. Alternatively stated, if minority and low-income ridership has increased, the difference in the impacts of the proposed fare changes between the overall customer population and minority and low-income customers would decrease. This is because in determining the impacts on the overall customer population, the weight of the impacts on minority and low-income customers would increase, while the weight of the impacts on non-minority and non-low-income customers would decrease. Additionally, there have been concerns about the potential movement of low-income and minority households into outer regions of the RTD service area and their reliance on RTD services that require the Regional fare. While there is no recent RTD-specific survey data suggesting this has occurred, if future survey data were to confirm this trend, the current Average Fare Analysis using the 2019 CSS provides a conservative estimate of the benefits of the proposed removal of the Regional fare for longer distance trips. The estimate of benefits may be conservative because the Average Fare Analysis in this Fare Equity Analysis understates the benefits for minority and low-income customers who were less likely to pay the Regional fare at the time of the 2019 CSS.

#### 4.1.2 Assumptions

The 2019 CSS, while comprehensive with a significant number of survey responses, does have some limitations. Low response rates for some rider categories, fare levels and fare payment types, as well as the absence of some fare payment options on the survey pose several challenges. The Average Fare Analysis attempts to address the

limitations of the data by using demographics for similar rider categories or aggregating responses for different fare payment types for a specific rider category.

The following demographic assumptions are used in the Average Fare Analysis:

- Demographics for full fare customers who are not eligible for a discounted fare or for a pass program are assumed to vary by fare level (Local, Regional, Airport) and by fare payment type, including whether fares are paid with electronic fare media (i.e., MyRide Stored Value or Mobile Ticket) for 3-Hour and Day Pass customers.
- Demographics for youth are assumed to align with the demographics of Local full fare customers. The methodology of the 2019 CSS specifically avoids targeting youth customers under the age of 18, so this customer group is underrepresented in the 2019 CSS, representing less than 2% of customers in the survey. Due to insufficient survey responses, we consider youth demographics to be similar to those of their family. Additionally, since 93% of youth boardings are assumed to occur on Local services, youth demographics are assumed to mirror Local full fare customer demographics.
- Demographics for seniors, individuals with disabilities and Medicare recipients are assumed to vary by fare level and fare payment type. No distinction in demographics by fare media type is assumed due to insufficient survey responses. For Airport fares, demographics are aggregated for all fare payment types due to limited survey responses.
- Demographics for LiVE customers are assumed not to vary by fare level or fare payment type. The 2020 LiVE Program Survey did not ask respondents about the fare level they typically paid. Responses were aggregated for all fare payment types as the differences between the fare payment types was minimal.
- Demographics for expanded LiVE customers are assumed to align with full fare customers with a household income between 185% and 250% of the federal poverty level who would become eligible for the LiVE Program. Demographics are assumed to vary by fare level. Demographics are not assumed to vary by fare payment type due to insufficient survey responses.
- Demographics for bulk sales are assumed to align with the demographics for all rider categories and fare payment types for a given fare level.
- Demographics for pass program customers are assumed to vary by pass program (Business EcoPass, Neighborhood EcoPass or CollegePass) and fare level (Local, Regional, Airport).
- Demographics for Semester Pass are assumed to align with the demographics for CollegePass customers.

A number of assumptions were also made in the Average Fare Analysis regarding:

- Impact of fare capping on customers and electronic MyRide fare adoption
- Participation of full fare customers in the LiVE Program with the income eligibility expansion
- Average fare assumed for Business EcoPass, Neighborhood EcoPass and CollegePass
- Introduction of a new LiVE Monthly Pass/Fare Cap and Semester Pass

The Average Fare Analysis assumes the 3-Hour and Day Pass customers using electronic fares will benefit with the introduction of fare capping, reducing the average fare paid by these customers in addition to the reduction due to the proposed fare pricing decreases. The Average Fare Analysis assumes that non-minority and non-low-income customers disproportionately benefit from the introduction of fare capping given their higher adoption of electronic fare media based on the 2019 CSS.

The benefits of fare capping are accrued only by customers paying stored value using a MyRide Barcode in the MyRide App or MyRide Smart Card. While customers with credit and debit cards are able to load value online or through the MyRide App and Website, cash customers can only load value at the four RTD Sales Outlets that are currently open across the region. There is no MyRide retail network at the time of the preparation of this report. Given the limitations to loading cash to a MyRide account, there is no basis for assuming increased electronic fare adoption.

Introduction of fare capping for customers paying fares using MyRide stored value results in a reduction in the average fare paid by customers, in particular 3-Hour and Day Pass customers. Instead of purchasing a Day or Monthly Pass upfront, fares paid by customers accrue towards daily and monthly fare caps, ensuring customers always pay the best fare. For 3-Hour and Day Pass customers, the cost savings is anticipated to be notable, especially with the reduction in the full fare Monthly Pass multiple from 38 to 32 times the 3-Hour Pass price. For Monthly Pass customers, the cost savings is anticipated to be minimal as most Monthly Pass customers are making more than 38 trips per month and others who purchase the Monthly Pass for convenience are making more than 32 trips per month. The cost savings anticipated for 3-Hour and Day Pass customers using electronic fare media are incorporated into the average fares for the proposed fare structure. The reduction in the average fare is based on 2017 CSS data that provide the distribution of 3-Hour and Day Pass respondents by the number of trips taken. 2017 CSS was used because it provided a larger data set than the 2019 CSS as well as the data needed on the number of trips taken in the last week.

For determining the number of boardings that would potentially benefit from fare capping, the Average Fare Analysis uses 2021 ticket sales data to determine electronic fare adoption for 3-Hour and Day Pass customers. Electronic fare adoption is determined by calculating the proportion of tickets sold through the MyRide App (formerly branded the RTD Mobile Tickets App) and MyRide stored value compared to total purchases, including purchases at bus fareboxes or rail ticket vending machines. The Average Fare Analysis assumes electronic fare adoption varies by rider category, fare level and fare payment type. While 3-Hour and Day Pass customers will continue to be able to purchase 3-Hour and Day Pass mobile tickets rather than using stored value, the Average Fare Analysis assumes that 100% of electronic fare customers would use MyRide stored value and thus benefit from fare capping.

For LiVE customers, including those eligible as a result of the income eligibility expansion, the Average Fare Analysis assumes 100% electronic fare adoption for 3-Hour Pass and Day Pass as these customers must pay fares using electronic fare media.

The Average Fare Analysis does not assume any adjustment to the average fare paid for 10-Ride Ticket customers due to the introduction of fare capping. In 2021, less than 2% of 10-Ride Ticket Books were sold through the MyRide App.

LiVE participation is expected to increase slightly with the expansion of the LiVE Program household income eligibility limit from 185% to 250% of the federal poverty level. The Average Fare Analysis assumes that these “expanded LiVE” customers would go from paying the full fare under the current fare structure to paying the LiVE fare under the proposed fare structure. Given the slightly higher transfer and usage rates for LiVE customers compared to full fare customers, the average fare for these customers is based on the same transfer and usage rates as LiVE customers. The increased participation is based on the estimated current LiVE Program participation rate among income eligible customers and the number of boardings made by full fare customers who would become income eligible for the LiVE Program as part of the income eligibility expansion. The current LiVE Program

participation rate and the share of boardings that would become eligible for LiVE as part of income eligibility expansion are based on the 2017 CSS.

Business EcoPass, Neighborhood EcoPass (NECO) and CollegePass contract pricing is based on prior ridership data and the applicable fare. Given that pricing is based on prior ridership, 2021 contract pricing was based on pre-COVID ridership, resulting in a temporarily higher average fare. To reflect the average fare per boarding in the future as ridership stabilizes, the Average Fare Analysis uses the average fare that would have been collected based on 2021 ridership data and the applicable fare under the current fare structure and proposed fare structure.

For CollegePass, the total number of boardings is understated. For Auraria Higher Education, RTD introduced an option to use the MyRide App for CollegePass students. Ridership data for these students using the app is not available and thus is excluded from the Average Fare Analysis. Further, Auraria Higher Education offered its CollegePass as an opt-in pass. If Auraria Higher Education returns to an all-in model that provides a CollegePass to all eligible students, ridership is anticipated to increase.

The Average Fare Analysis assumes the introduction of two new fare payment types: LiVE Monthly Pass (as well as a monthly fare cap) and Semester Pass. These new fare payment types will likely disproportionately benefit low-income and minority customers. As such, the assumptions for adoption of these products are constrained in the Average Fare Analysis so as to not overstate the benefits of the new fare payment types, and are described further below.

For current LiVE customers, the Average Fare Analysis incorporates the benefits of introducing a LiVE Monthly Pass to the fare capping assumptions for LiVE 3-Hour and Day Pass customers. For new LiVE customers that become eligible for LiVE as part of the income eligibility expansion, the Average Fare Analysis incorporates separate line items for the Monthly Pass as these newly eligible LiVE customers are assumed to transition from purchasing a full fare Monthly Pass to purchasing a LiVE Monthly Pass. While introducing a LiVE Monthly Pass may increase interest in the LiVE Program, no increase in LiVE participation is assumed in order to not overstate the benefits of introducing a LiVE Monthly Pass for low-income and minority customers.

For Semester Pass, the Average Fare Analysis assumes that 1% of full fare Local Monthly Pass customers would transition to purchasing a Semester Pass. This is based on the share of Monthly Pass customers who indicated “to/from school/college” as the primary purpose of the trip taken on the 2019 CSS. The analysis was careful to exclude CollegePass and youth respondents when making the 1% calculation. The Average Fare Analysis does not assume any transition of full fare Regional Monthly Pass customers to Semester Pass as there were no Regional Monthly Pass respondents indicating “to/from school/college” as the primary purpose of the trip taken.

While the proposed changes include the introduction of a Transit Assistance Grant Program, the potential implications of that program are not included in the Average Fare Analysis. The Grant Program is not included because it is intended to generate new ridership, and grant recipients are to distribute the 10-Ride Ticket Books at no cost to their clients. Further the tickets distributed through the program are not intended to supplant current fare purchases by grant recipients.

Within the baseline model, reflecting RTD’s existing fare structure, there is no Airport Monthly Pass. Instead, customers may use their Regional Monthly Pass for trips that require the Airport fare and the Airport boardings associated with the use of the Regional Monthly Pass for trips to/from Denver International Airport are included with the Regional Monthly Pass in the Average Fare Analysis. When evaluating the proposed alternative, the



Regional Monthly Pass effectively ceases to exist and all boardings associated with Regional and Airport Monthly Pass travel will be priced at the new, lower Local Monthly Pass price.

For the Bulk Purchase Program, the Average Fare Analysis assumes that all purchases by nonprofit organizations in 2021 would transition to the program as well as 10% off full fare Monthly Passes. Prior to the discontinuation of the FlexPass Program (a prior RTD program similar to the Bulk Purchase Program proposal), approximately 10% of full fare Monthly Passes were purchased through the program. The FlexPass Program provided a discount on Monthly Pass purchases based on the number of passes purchased, whether the employer provided a matching discount to employees and whether the employer offered the FlexPass on a pre-tax basis.

Due to insufficient data to support other assumptions, the Average Fare Analysis assumes that overall customers, minority customers and low-income customers have identical usage rates and transfer rates for a given fare payment type. This means that for any given fare payment type, it is assumed that overall, minority and low-income customers will all have the same average fare. To be clear: the analysis only assumes that the average fare is identical for overall, minority and low-income customers within a given fare payment type; average fares are assumed to differ across fare payment types (e.g., 3-Hour Pass, Day Pass), rider categories (e.g., full fare, LiVE customers) and fare levels (i.e., Local, Regional, Airport).

## 5 System Ridership Demographics Overview

The following provides an overview of RTD's systemwide ridership using data from the 2019 CSS, which is the most recent onboard survey with the detailed information needed for the Fare Equity Analysis. While other data sources have been consulted for the Fare Equity Analysis, the 2019 CSS provides the most accurate data for portraying systemwide ridership demographics.

These demographic statistics were considered in the development of the proposed fare changes in order to minimize or avoid the potential for changes that would result in Disparate Impacts on minority customers or a Disproportionate Burden on low-income customers.

### 5.1 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 respondents who refused to respond to the racial/ethnicity question. Additionally, respondents who did not choose an ethnicity or race yet submitted a survey response that did not comport with racial/ethnicity designations (e.g., "Human," "Female Only," "Russian") were assumed to be non-minority. The racial/ethnicity categories in the survey include:

1. African-American/Black
2. Asian/Pacific Islander
3. Caucasian/White - not of Hispanic origin
4. Hispanic/Latino
5. Native American/Indian
6. Other (please specify)

## 5.2 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 (also referred to as federal poverty level). To align with the 2019 CSS, the 2019 HHS Poverty Guidelines were used to determine which populations would be considered low-income.

Table 5 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 6 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% U.S. 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 5: 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 6: 2019 Customer Satisfaction Survey Household 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	

## 5.3 Ridership Demographics

Figures 1 and 2 provide an overview of systemwide fixed-route ridership by minority and income status for those who responded to ethnicity and income related questions, excluding those who refused to respond to ethnicity or income questions. For purposes of the analysis, minority status is characterized as anyone who responded to anything other than only “Caucasian/White.” Low-income status was determined through a cross tabulation of household income and size, matching the income to 150% of the U.S. HHS Poverty Guidelines, as discussed above. It should be noted that for purposes of this Fare Equity Analysis, low-income customers are defined as those at or below 150% of the federal poverty level. This is different from the current RTD definition for income eligibility for the income-based LiVE Program, which is set at or below 185% of the federal poverty level for adults ages 20-64.

Figure 1: Ridership Ethnicity

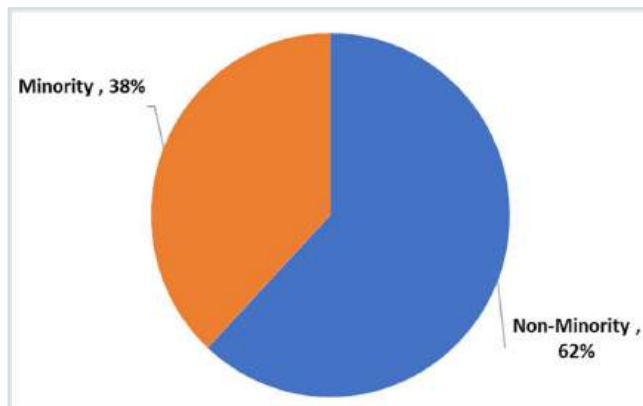
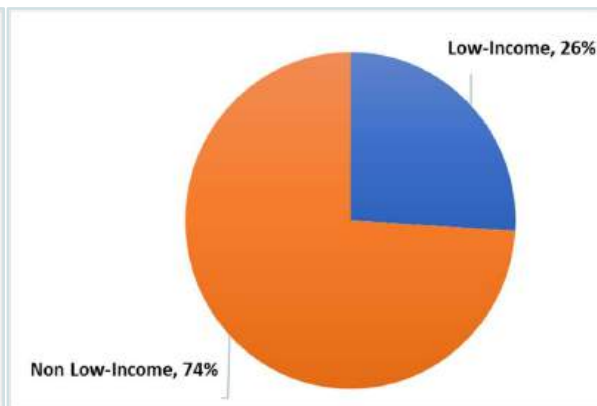


Figure 2: Ridership Income



To support the Fare Equity Analysis, cross-tabulations of the 2019 CSS were performed for those who responded to ethnicity- and income-related questions to develop a breakdown of demographics by fare payment type. Because the 2019 CSS was conducted prior to the launch of the LiVE Program, data from the 2020 LiVE Program Survey and the Average Fare Analysis were used to modify the fare payment profiles to account for the LiVE Program. Recognizing that various fare changes may impact some protected groups more than others, the relationship between fare payment type and ethnicity and income was reviewed. Table 7 presents the fare payment type by minority and income status.

Table 7: Fare Payment Type by Minority and Income Status

Total RTD System Fare Payment Profile			
Fare Type	Overall Customers	Minority Customers	Low-Income Customers
Full Fare, 3-Hour Pass	15.6%	15.5%	20.7%
Full Fare, 10-Ride	5.8%	7.0%	5.9%
Full Fare, Day Pass	9.7%	11.6%	9.9%
Full Fare, Monthly Pass	13.3%	14.7%	10.8%
LiVE, 3-Hour Pass	0.3%	0.4%	0.7%
LiVE, 10-Ride	<0.1%	<0.1%	<0.1%
LiVE, Day Pass	0.4%	0.6%	1.1%
Youth, 3-Hour Pass	0.9%	1.3%	1.8%
Youth, 10-Ride	0.4%	0.9%	0.4%
Youth, Day Pass	0.1%	0.0%	0.0%

Youth, Monthly Pass	0.4%	1.1%	1.6%
Senior/Disabled, 3-Hour Pass	6.4%	5.3%	8.3%
Senior/Disabled, 10-Ride	2.5%	2.4%	3.7%
Senior/Disabled, Day Pass	2.8%	2.7%	4.0%
Senior/Disabled, Monthly Pass	3.3%	3.4%	6.2%
EcoPass (Business)	27.3%	22.1%	7.1%
EcoPass (NECO)	3.0%	1.3%	2.4%
CollegePass	7.7%	9.8%	15.3%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

Percentages may not sum to 100% due to rounding

Percentages for youth are underrepresented as survey staff are instructed to not to survey individuals under 18 years of age.

Sources: 2019 CSS, 2020 LiVE Program Survey

## 6 Fare Change Proposal

RTD's Systemwide Fare Study and Equity Analysis project launched in 2022 after customer feedback indicated that fares are too expensive and difficult to understand. The proposed fare changes include a number of structural and pricing changes to RTD's fares, as well as changes to current pass programs, introduction of new pass programs and technological changes to fare payment, including the introduction of fare capping facilitated by RTD's new MyRide fare collection system and described in Section 6.2. The three study goals, (1) equity, (2) affordability, and (3) simplicity, as well as customer, community and stakeholder input throughout the study led to the proposed fare changes summarized below.

### 6.1 Overview of Proposed Fare Changes

Proposed fare changes to be implemented in 2024 include changes to fare pricing, fare structure, pass programs and the LiVE Program, referenced below.

#### 6.1.1 Fare Structure

- Simplified fare structure by removing the Regional fare category
- For customers paying discounted fares, a single price fare level for all travel, including trips originating or ending at Denver International Airport

RTD's fare structure comprises three fare levels: Local, Regional and Airport. For rail trips, customers pay a Local or Regional fare based on the number of zones they travel through while fixed-route bus customers pay a Local or Regional fare based on the type of service and distance traveled. For FlexRide trips, customers pay the Local fare. The Airport fare applies to any rail travel in the Airport zone and for most bus service to/from Denver International Airport.

Under the proposed fare changes, full fare customers will pay a flat fare for all travel except for select trips originating or ending at Denver International Airport. Customers who begin or end their trip or who transfer at Denver International Airport will pay the Airport fare on select services. Customers who do not travel to Denver

International Airport but use fixed-route bus services with the Airport fare will continue to be able to downgrade the fare to pay the Local fare (e.g., SkyRide routes).

Routes 104L, 169L and 145X serving Denver International Airport will not be subject to the Airport fare. Routes 104L and 169L do not currently charge the Airport fare for trips originating or ending at Denver International Airport. Route 145X does currently charge the Airport fare, but will not be subject to the Airport fare for trips originating or ending at Denver International Airport under this proposal.

Customers paying discounted fares, including seniors, individuals with disabilities, LiVE customers and youth, will pay a single price and will not be subject to the Airport fare. This will provide these customers with access throughout the region for a single price.

Currently, customers who use a Local pass for a Regional or Airport trip or a Regional pass for an Airport trip must pay an upgrade. The proposed fare changes flatten the fare structure by removing the Regional fare level for all customers and the Regional and Airport fare level for customers paying discounted fares. These changes eliminate the need for unique Regional fare products. Further, customers paying discounted fares will no longer need to pay an upgrade for any travel. Upgrades will only be required for full fare Local 3-Hour and Day Pass customers making trips requiring the Airport fare.

### 6.1.2 Fare Discounts

- Increased LiVE discount from 40% to 50% on 3-Hour Pass and Day Pass
- Increased discount on the Monthly Pass for customers paying discounted fares to 70%, establishing one Monthly Pass price for customers paying discounted fares
- No change to 50% discount on 3-Hour Pass and Day Pass for seniors, individuals with disabilities and/or Medicare recipients
- No change to 70% discount on 3-Hour, Day and Monthly Passes for youth aged 19 and younger

Seniors, individuals with disabilities and Medicare recipients will continue to receive a 50% discount on full fare 3-Hour Pass and Day Pass, equating to a \$1.35 3-Hour Pass and a \$2.70 Day Pass. RTD proposes to increase the LiVE discount from 40% to 50% of the full fare Local 3-Hour and Day Pass. This aligns the LiVE discount/pricing with the discount for seniors, individuals with disabilities and Medicare recipients resulting in one, unified discounted fare level.

If the Zero Fare for Youth pilot is not implemented, or if Zero Fare for Youth is not made permanent after the pilot period, youth will continue to receive a 70% discount on full fare 3-Hour, Day and Monthly Passes.

The discount on the Monthly Pass for all customers paying a discounted fare will increase to 70%, establishing one discounted price of \$27.00.

For details on specific pricing assumed in the Fare Equity Analysis, see Table 8 in Section 6.2.

### 6.1.3 Fare Capping

- Introduction of daily (service day) and monthly (calendar) fare capping for customers using MyRide stored value with MyRide Barcode in the MyRide App or a new MyRide Smart Card

RTD's new MyRide fare collection system enables RTD to introduce fare capping, which offers customers the best fare based on their trip-making behavior. Unlike Monthly Passes, customers do not need to purchase a Monthly Pass upfront. With fare capping, customers can pay as they go and have their fares capped on a daily or monthly basis such that they do not exceed the price of a comparable Day Pass or Monthly Pass. This removes financial barriers for customers who may not be able to pay for a Monthly Pass upfront and also increases convenience for customers by providing them the best fare without needing to determine whether to purchase a pass upfront. Customers using stored value with MyRide Barcode in the MyRide App or a new MyRide Smart Card will be able to take advantage of fare capping.

All fares paid with MyRide stored value will apply towards the daily and monthly fare caps. For full fare customers traveling to/from Denver International Airport, Airport fares and upgrades may apply until the customer pays the equivalent of the price of the Airport Day Pass or Monthly Pass.

While under the proposed fare structure, all Monthly Pass customers will be able to travel to/from Denver International Airport without paying an Airport upgrade, full fare customers using fare capping will be paying on a trip-by-trip basis towards the daily and monthly fare caps. These customers will pay the Airport fare or upgrade until they reach the Airport daily fare cap or monthly fare cap.

#### 6.1.4 Fare Pricing

- Lowered Local and Airport fares
- Lowered Monthly Pass multiple to reflect hybrid work schedules and provide greater affordability for transit-reliant customers
- Eliminated the discount on 10-Ride Ticket Books for full fare customers, seniors, individuals with disabilities and Medicare recipients

The Airport fare will remain, but the fare will be lowered from \$10.50 to \$10.00 for a full fare 3-Hour Pass/Day Pass. The Local fare will also be lowered from \$3.00 to \$2.75 for a full fare 3-Hour Pass and from \$6.00 to \$5.50 for a full fare Day Pass. Lower full fare Local fares will result in lower fares for customers paying discounted fares.

The discount on 10-Ride Ticket Books will be eliminated for full fare customers, seniors, individuals with disabilities and Medicare recipients. LiVE and youth 10-Ride Ticket Books do not currently include a discount. 10-Ride Ticket Books will be priced at 10 times the price of the applicable 3-Hour Pass. More information about the availability of 10-Ride Ticket Books is presented in Section 6.2.

RTD will decrease the full fare Monthly Pass multiple from 38 to 32 times the price of the full fare 3-Hour Pass, resulting in an \$88 Monthly Pass and monthly fare cap for full fare customers. One Monthly Pass price will be established for customers paying discounted fares. This Monthly Pass will be discounted approximately 70%, equating to a Monthly Pass multiple of 31.8 for youth, and a Monthly Pass multiple of 20.0 for seniors, individuals with disabilities, Medicare recipients and LiVE customers.

For details on specific pricing assumed in the Fare Equity Analysis, see Table 8 in Section 6.2.

While paratransit fare changes are not analyzed in this Fare Equity Analysis, RTD will be changing its Access-a-Ride fares. The Local Access-a-Ride fare will change from \$5.00 to \$4.50, and the Airport Access-a-Ride fare will change from \$20.00 to \$19.00. The Regional Access-a-Ride will be discontinued. Customers can pay their Access-a-Ride fare in cash on-vehicle or with a mobile ticket. Local paper 6-Ride Ticket Books will continue to be available and

priced at six times the Local Access-a-Ride fare. As part of the proposed fare changes, RTD will also allow eligible customers to apply a 50% LiVE discount to Access-a-Ride fares.

### 6.1.5 LiVE Eligibility, Fare Products and Discounts

- Expanded LiVE eligibility requirements to encourage LiVE participation
- Introduction of a LiVE paper and mobile Monthly Passes and MyRide monthly fare capping
- Increased discounts for customers using LiVE fares
- Travel anywhere in the service area for a single price fare level (no Regional and Airport fare)

The proposed fare changes include expanding access to the LiVE low-income fare program. The income eligibility threshold will increase from 185% to 250% of the federal poverty level, and customers applying to the LiVE Program will no longer need an address within RTD's service district, which will require a change to the Colorado state PEAK system used for eligibility verification.

RTD will introduce LiVE paper and mobile Monthly Passes as well as monthly fare capping for LiVE customers using MyRide Barcode in the MyRide App or new MyRide Smart Card. Introduction of the new LiVE Monthly Pass will improve access to LiVE fares. The Monthly Passes and monthly fare capping will also increase the affordability of transit for LiVE customers by capping the amount spent on transit for these customers on a calendar month basis.

As noted above in Section 6.1.2, the discount for LiVE customers will increase to 50% on 3-Hour Pass and Day Pass and 70% on Monthly Passes, aligning them with seniors, individuals with disabilities and Medicare recipients. The price of 3-Hour and Day Pass for LiVE customers will align with those for seniors, individuals with disabilities and Medicare recipients. There would be no change to how LiVE customers would purchase 3-Hour Passes and Day Passes. RTD continues to increase opportunities for LiVE customers to access fare products. As discussed earlier, RTD is planning on introducing a paper and mobile LiVE Monthly Pass. RTD is also exploring expanded opportunities to purchase fares using cash at retail locations. At a future point in time, if the provision of LiVE Monthly Passes and expanded retail opportunities to facilitate cash purchases is still determined to be insufficient to meet the needs of LiVE customers, RTD may consider other cash payment opportunities. Section 6.1.8 provides additional detail on expanded retail opportunities, and Table 9 in Section 6.3 identifies the current and proposed fare distribution by fare payment type and rider category.

Also as noted above in Section 6.1.1, the Regional fare will be removed and the remaining Airport fare will not apply for LiVE customers under the new fare structure.

Also, while paratransit fare changes are not analyzed in this Fare Equity Analysis, RTD will allow customers to apply a 50% LiVE discount to Access-a-Ride fares.

### 6.1.6 Other Programs

- Establishment of a Transit Assistance Grant Program to assist organizations that serve individuals with immediate transit needs
- Introduction of a discount for bulk purchases through a Bulk Purchase Program
- Introduction of a Semester Pass Program to provide an opt-in pass alternative to the CollegePass program for smaller colleges and community colleges



### **Transit Assistance Grant Program**

RTD proposes to introduce a Transit Assistance Grant Program to help organizations serving clients with immediate transit needs. RTD will initially distribute up to \$1 million of full fare paper 10-Ride Ticket Books per calendar year at no cost to grant recipients. The grant recipients must distribute the tickets to their clients or constituents for free. RTD will release one annual call for grant proposals and a grant program selection panel, consisting of internal RTD staff and external stakeholders, will determine grant recipients based on clear and transparent evaluation criteria, such as an organization's IRS Tax Exempt Letter and whether they serve populations with immediate transit needs. The RTD in consultation with the grant program selection panel will determine evaluation criteria, the scope of reporting requirements and participant responsibilities. RTD is budgeting internal funding for the Transit Assistance Grant Program; however, in the future, RTD may seek supplemental funding from external partners.

### **Bulk Purchase Program**

The proposed Bulk Purchase Program will introduce a 10% discount on bulk purchases with an invoice amount of \$1,500 or more. RTD currently allows organizations and employers to purchase fare products in bulk, but does not provide a discount on bulk purchases. Contracts are currently required for recurring bulk paper purchases or any mobile bulk purchases. Customers will be able to purchase all fare products available to the public through the Bulk Purchase Program except stored value, and current contract rules are likely to remain. The discount does not apply to EcoPass, Neighborhood EcoPass or CollegePass contracts. If the ability to purchase stored value for individuals in bulk becomes available in the future, the bulk discount would not apply to stored value loads.

While any individual or organization can purchase fare products through the Bulk Purchase Program, RTD will manage payments differently based on organization and sale type. For nonprofit and community based organizations, online orders, and one-time orders, customers will prepay. Customers with unused paper fare products are not eligible for refunds, but nonprofit and community based organizations may be eligible to exchange expired, unused paper 10-Ride Ticket Books. Customers purchasing bulk mobile passes will pay for the passes that are activated and used, with the discount calculated once utilization is determined and if the invoice amount is \$1,500 or more.

While employers or organizations purchasing fare products via the Bulk Purchase Program may pass on the cost of the pass to employees or clients, the amount collected cannot exceed the amount paid for the pass.

### **Semester Pass**

In response to community feedback about alternatives to CollegePass, RTD proposes to establish a Semester Pass Program for post-secondary educational institutions, targeted towards smaller colleges and community colleges. The program will be open to post-secondary educational institutions not enrolled in CollegePass. Participating institutions will offer the Semester Pass to enrolled part-time or full-time students, and institutions can pass through the entire cost of the pass or subsidize all or part of the cost for students. Students purchasing a Semester Pass will be able purchase the pass on an opt-in basis from the participating institution. Participating institutions that subsidize the Semester Pass may also opt to subsidize the pass for all or a subset of students.

The Semester Pass will be valid for a term duration set by the institution. The pricing will total approximately 80% of a full fare Monthly Pass per month of the valid term. Students will be able to use the Semester Pass on all fixed-route and FlexRide services, including travel to/from Denver International Airport.

Students eligible for LiVE fares, students with disabilities or youth may opt not to participate in the Semester Pass program, as discounted fares will provide lower fare prices.

RTD will collect the fare revenue from the participating institution based on the passes issued. The institutions will be responsible for collecting fees and distributing the passes to their students.

### 6.1.7 Pass Program

- Simplified EcoPass, Neighborhood EcoPass, and CollegePass programs

#### Business EcoPass

RTD's Business EcoPass is an employer-sponsored pass that provides eligible employees at participating employers unlimited rides on fixed-route and FlexRide services. The program is based on a calendar year and is an all-in, insurance-based model, which means employers must purchase passes for every eligible employee. Employers can decide to completely subsidize the price of the pass, or pass all or part of the costs on to the employee, who can pay for it with pre-tax dollars. Business EcoPass pricing is based on three factors: number of employees, a business's location in the RTD service area (referred to as Service Level Areas (SLAs)) and actual ridership two years in arrears (referred to as utilization-based pricing). For large employers with over 3,000 employees, employer-specific ridership data is used for pricing. For new large employers, SLA pricing is used until employer specific ridership data is available for contract pricing. RTD manages the program via annual contracts with employers. Independent of the policy changes proposed in the Fare Study, RTD will eliminate photos on Business EcoPass MyRide Smart Cards.

There are several proposed changes to the Business EcoPass program.

- RTD will introduce fixed pricing for 2-year intervals starting in 2024 and 2025. Currently, pricing is updated annually. Pricing in 2-year intervals will apply to employers subject to SLA pricing, and large employers.
- RTD will consolidate SLA A (suburban) and SLA B (major transit centers), and consolidate all employer size categories (currently four) to a single size category. This will reduce the total number of pricing zones across the region from 16 to three.
- The contract minimums will be reduced from \$1,368/year for SLAs A and B, and \$2,400/year for SLAs C and D to a single contract minimum of \$950/year for all SLAs. This is equal to the purchase of 12 Monthly Passes at the Bulk Purchase Program price.
- All trips taken by Business EcoPass participants will be priced at the full fare, Local fare rate, and the Airport fare will not be applied when determining utilization pricing. Currently, the Business EcoPass pricing applies the applicable fare level (Local, Regional, Airport) for each trip taken when determining utilization pricing. As the Local Monthly Pass will now be valid for all travel, including to/from Denver International Airport, without an Airport upgrade, the Business EcoPass will also entitle the passholder to travel to/from Denver International Airport.
- Participants will have the option to use the MyRide App rather than a MyRide Smart Card. Historically, employees participating in EcoPass received a MyRide smart card with their name and photo on it.

Although fare capping will be available to the general public, fare capping will not apply to Business EcoPass utilization pricing. Similarly, RTD will not provision entitlements onto eligible Business EcoPass participants'

accounts, so discounted fares will not be factored into utilization pricing. Further, the discount offered through the Bulk Purchase Program will not apply to Business EcoPass contracts.

### Neighborhood EcoPass

Neighborhood EcoPass (NECO) is a pass program providing residents of enrolled neighborhoods, apartment buildings and/or homeowner associations unlimited rides on fixed-route and FlexRide services. The NECO program operates in a similar way to Business EcoPass and is based on an all-in, insurance-based model, which means neighborhoods must purchase passes for all household residents, but pricing is slightly different. For new NECO contracts, pricing is initially based on a fixed price per household. Once neighborhood specific data is available, pricing is based on utilization ridership data for the neighborhood. Unlike Business EcoPass, RTD incorporated fare discounts for youth, seniors and individuals with disabilities in determining NECO pricing. While historically NECO participants have been provided with a NECO MyRide smart card with their photo on it, policy changes independent of the Fare Study will mean that future NECO MyRide Smart Cards will not have photos.

There are several proposed changes to the NECO program.

- Similar to Business EcoPass, all trips taken by NECO participants will be priced at the full fare, Local fare rate, and the Airport fare will not be applied when determining utilization pricing. Further, no fare discounts will be applied for youth, seniors and individuals with disabilities for contract pricing.
- RTD will make permanent the temporary reduction of the NECO contract minimum from \$7,000 to \$4,000. Prior to COVID, the contract minimum for a neighborhood was \$7,000. During COVID, due to decreases in transit ridership, the contract minimum was temporarily reduced to \$4,000.
- RTD will reduce new neighborhood pricing from \$175 per household per year to \$125 per household.
- Participants will have the option to use the MyRide App rather than a MyRide Smart Card. Historically, residents participating in NECO received a MyRide smart card with their name and photo on it.
- Since utilization pricing will not take into account fare discounts for youth, seniors and individuals with disabilities, NECO neighborhood coordinators will not need to provide information on whether a participant would qualify for a fare discount, simplifying their roles and responsibilities. Further, RTD will not add entitlements onto eligible NECO participants' accounts.

In alignment with Business EcoPass, fare capping will not apply to NECO pricing.

### CollegePass

CollegePass is a pass program offered to post-secondary educational institutions. Students enrolled in CollegePass can take unlimited rides on fixed-route and FlexRide services. RTD maintains annual contracts with colleges and universities based on the all-in, insurance-based model with institution-specific utilization pricing. As an all-in program, institutions are required to enroll all eligible students into CollegePass. CollegePass is not an opt-in pass program for students (see proposed Semester Pass for opt-in program for post-secondary educational institutions). For new CollegePass contracts, pricing is initially based on a fixed price per student until institution-specific ridership data is available for contract pricing. Colleges and universities can decide to completely subsidize the price of the pass, or pass all or part of the costs to students. While historically CollegePass students have been provided with a MyRide smart card with their photo on it, policy changes independent of the Fare Study will mean that future CollegePass MyRide Smart Cards will not have photos.

There are several proposed changes to the CollegePass program.

- Similar to EcoPass, all trips taken by CollegePass participants will be priced at the full fare, Local fare rate, and the Airport fare will not be applied when determining utilization pricing. In alignment with Business EcoPass and NECO, RTD will not count discounted fares toward utilization pricing for CollegePass.
- RTD will reduce the pricing for new colleges/universities from approximately \$26 per student per month to \$15 per student per month.
- Contract minimums for participating colleges will decrease from \$15,600 per academic year to \$9,000 per academic year.
- Students will have the option to use the MyRide App rather than a MyRide Smart Card. Historically, students participating in CollegePass received a MyRide smart card with their name and photo on it.

In alignment with Business EcoPass and NECO, fare capping will not apply to CollegePass pricing.

### 6.1.8 Additional Fare Guidance

The Systemwide Fare Study and Equity Analysis identified additional fare changes and/or pilots. These changes/pilots are not evaluated in this Fare Equity Analysis.

#### Zero Fare for Youth Pilot Program

RTD is intending to proceed with a Zero Fare for Youth Pilot Program for a period of up to 18-months. The proposed Zero Fare for Youth Pilot Program is not included in this Fare Equity Analysis or in the Average Fare Analysis, but should the pilot be made permanent or extend beyond 6-months without a waiver from FTA, a Title VI Fare Equity Analysis would be required. The duration of the pilot would be up to 18-months with a start date to be determined. All youth ages 19 and younger, regardless of residency, would be eligible for participation in the pilot. Proof of eligibility that would be required to ride free is to be determined. The pilot would likely be supported by internal RTD funds with potentially some additional support from external funding partners. A permanent Zero Fare for Youth Program would be contingent upon the availability of sustainable, external funding. At the conclusion of the pilot, if it was not made permanent, youth fares would revert to a 70% discount on the full fare 3-Hour, Day and Monthly Passes, as noted in Section 6.1.2.

Because the Zero Fare for Youth Program is intended as a pilot with no established schedule for either implementation or termination, this Fare Equity Analysis and Average Fare Analysis assumes that the fare pricing for youth ages 19 and younger would remain at a 70% discount of the full fare before and after the pilot. For details on specific pricing assumed in the Fare Equity Analysis, see Table 8 in Section 6.2.

#### LiVE Access Expansion

During customer, community and stakeholder outreach, RTD received feedback for the need to increase awareness of the LiVE Program and work with community partners to better market and expand access to the LiVE Program. RTD plans to develop a comprehensive outreach and engagement action plan. RTD also plans to explore expanding means testing beyond the current State of Colorado's PEAK system, which is used to determine eligibility for federal and state assistance programs such as the Supplemental Nutrition Assistance Program (SNAP) and Colorado's Medicaid program. Expanding means testing beyond the PEAK system and changes to eligibility

criteria not listed above in Section 6.1.5 are not included in this Fare Equity Analysis or in the Average Fare Analysis, but should the criteria for eligibility change, a Title VI Fare Equity Analysis would be required.

### Expanded MyRide Retail Opportunities

The ability for customers to load cash into their MyRide accounts is critical for promoting equitable access and adoption of the electronic MyRide fares. At the time of preparation of this report, cash customers can only load value to their MyRide account at the four RTD Sales Outlets that are currently open in the region. Expansion of MyRide retail opportunities beyond the four RTD Sales Outlets will improve access for unbanked and underbanked customers to load cash to their accounts. While RTD plans to expand MyRide retail opportunities, RTD is still in the process of procuring retail expansion opportunities and as such it is not included in this Fare Equity Analysis. The introduction of a substantially expanded set of retail opportunities would require a future Title VI review.

## 6.2 Pricing, Payment and Media Changes

Table 8 summarizes the proposed fare pricing changes by fare payment type. Several fare changes aim to simplify RTD's fare structure and introduce more equitable and affordable fares for RTD customers.

Proposed fare media and product changes include introduction of fare capping, elimination of all Regional fare products and acceptance of Local fare products on Regional services, elimination of mobile 10-Ride Ticket Books and introduction of a LiVE Monthly Pass and fare cap.

- RTD will introduce daily (service day) and monthly (calendar) fare capping for customers using MyRide stored value with MyRide Barcode in the MyRide App or a new MyRide Smart Card, as noted in Section 6.1.3
- RTD will eliminate mobile 10-Ride Ticket Books since discounts will no longer be provided on 10-Ride Ticket Books as noted in Section 6.1.4 and customers will be able to purchase multiple mobile 3-Hour Passes in the MyRide App in one transaction. Customers will continue to be able to purchase paper 10-Ride Ticket Books via the RTD Online Store, RTD and Third Party Sales Outlets and the Bulk Purchase Program. RTD will also distribute paper 10-Ride Ticket Books through the proposed Transit Assistance Grant Program discussed in Section 6.1.6.
- RTD will introduce a LiVE Monthly Pass and fare cap, which will align with the other discounted fare Monthly Pass/cap, as noted in Section 6.1.5.

The fare payment types that are highlighted in light teal are newly available fare payment types (e.g., daily and monthly fare capping), while the fare payment types that are highlighted in light gray are discontinued fare payment types (e.g., mobile 10-Ride Ticket Books).

**Table 8: Proposed Changes to Fare Pricing and Payment Type Availability**

Current Fare Payment Type	Current Price	Proposed Fare Payment Type	Proposed Price
<b>Full Fare</b>			
<b>Local</b>			
<b>3-Hour Pass</b>	\$3.00	<b>3-Hour Pass</b>	\$2.75
<b>Paper 10-Ride Ticket Book</b>	\$28.00	<b>Paper 10-Ride Ticket Book</b>	\$27.50
<b>Mobile 10-Ride Ticket Book</b>		<b>Mobile 10-Ride Ticket Book</b>	Discontinued
<b>Day Pass (service day)</b>	\$6.00	<b>Day Pass (service day)</b>	\$5.50

Current Fare Payment Type	Current Price	Proposed Fare Payment Type	Proposed Price
		Daily Fare Capping (service day)	\$5.50
Monthly Pass (calendar)	\$114.00	Monthly Pass (calendar)	\$88.00
		Monthly Fare Capping (calendar)	\$88.00
Regional (Eliminated with Proposed Fare Change, Local Fare Rates Apply)			
3-Hour Pass	\$5.25	3-Hour Pass	\$2.75
Paper 10-Ride Ticket Book	\$50.50	Paper 10-Ride Ticket Book	\$27.50
Mobile 10-Ride Ticket Book		Mobile 10-Ride Ticket Book	Discontinued
Day Pass (service day)	\$10.50	Day Pass (service day)	\$5.50
		Daily Fare Capping (service day)	\$5.50
Monthly Pass (calendar)	\$200.00	Monthly Pass (calendar)	\$88.00
		Monthly Fare Capping (calendar)	\$88.00
Airport			
3-Hour Pass/Airport Day Pass	\$10.50	3-Hour Pass/Day Pass	\$10.00
Day Pass (service day)	\$10.50	Day Pass (service day)	\$10.00
		Daily Fare Capping (service day)	\$10.00
Monthly Pass (calendar)	\$200.00	Monthly Pass (calendar)	\$88.00
		Monthly Fare Capping (calendar)	\$88.00
Seniors and Individuals with Disabilities			
Local			
3-Hour Pass	\$1.50	3-Hour Pass	\$1.35
Paper 10-Ride Ticket Book	\$14.00	Paper 10-Ride Ticket Book	\$13.50
Mobile 10-Ride Ticket Book		Mobile 10-Ride Ticket Book	Discontinued
Day Pass (service day)	\$3.00	Day Pass (service day)	\$2.70
		Daily Fare Capping (service day)	\$2.70
Monthly Pass (calendar)	\$57.00	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00
Regional (Eliminated with Proposed Fare Change, Local Fare Rates Apply)			
3-Hour Pass	\$2.60	3-Hour Pass	\$1.35
Paper 10-Ride Ticket Book	\$25.25	Paper 10-Ride Ticket Book	\$13.50
Mobile 10-Ride Ticket Book		Mobile 10-Ride Ticket Book	Discontinued
Day Pass (service day)	\$5.25	Day Pass (service day)	\$2.70
		Daily Fare Capping (service day)	\$2.70
Monthly Pass (calendar)	\$99.00	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00
Airport			
3-Hour Pass	\$5.25	3-Hour Pass/Day Pass (service day)	\$1.35
Day Pass (service day)	\$5.25	Day Pass (service day)	\$2.70
		Daily Fare Capping (service day)	\$2.70

Current Fare Payment Type	Current Price	Proposed Fare Payment Type	Proposed Price
Monthly Pass (calendar)	\$99.00	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00
Youth			
Local			
3-Hour Pass	\$0.90	3-Hour Pass	\$0.85
Paper 10-Ride Ticket Book	\$9.00	Paper 10-Ride Ticket Book	\$8.50
Mobile 10-Ride Ticket Book		Mobile 10-Ride Ticket Book	Discontinued
Day Pass (service day)	\$1.80	Day Pass (service day)	\$1.70
		Daily Fare Capping (service day)	\$1.70
Monthly Pass (calendar)	\$34.20	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00
Regional (Eliminated with Proposed Fare Change, Local Fare Rates Apply)			
3-Hour Pass	\$1.60	3-Hour Pass	\$0.85
Paper 10-Ride Ticket Book	\$16.00	Paper 10-Ride Ticket Book	\$8.50
Mobile 10-Ride Ticket Book		Mobile 10-Ride Ticket Book	Discontinued
Day Pass (service day)	\$3.20	Day Pass (service day)	\$1.70
		Daily Fare Capping (service day)	\$1.70
Monthly Pass (calendar)	\$60.00	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00
Airport			
3-Hour Pass	\$3.20	3-Hour Pass/Day Pass	\$0.85
Day Pass (service day)	\$3.20	Day Pass (service day)	\$1.70
		Daily Fare Capping (service day)	\$1.70
Monthly Pass (calendar)	\$60.00	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00
LiVE (Low-Income Fare Program)			
Local			
3-Hour Pass	\$1.80	3-Hour Pass	\$1.35
Paper 10-Ride Ticket Book	\$18.00	Paper 10-Ride Ticket Book	\$13.50
Mobile 10-Ride Ticket Book		Mobile 10-Ride Ticket Book	Discontinued
Day Pass (service day)	\$3.60	Day Pass (service day)	\$2.70
		Daily Fare Capping (service day)	\$2.70
Monthly Pass (calendar)	Not available	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00
Regional (Eliminated with Proposed Fare Change, Local Fare Rates Apply)			
3-Hour Pass	\$3.15	3-Hour Pass	\$1.35
Paper 10-Ride Ticket Book	\$31.50	Paper 10-Ride Ticket Book	\$13.50



Current Fare Payment Type	Current Price	Proposed Fare Payment Type	Proposed Price
Mobile 10-Ride Ticket Book		Mobile 10-Ride Ticket Book	Discontinued
Day Pass (service day)	\$6.30	Day Pass (service day)	\$2.70
		Daily Fare Capping (service day)	\$2.70
Monthly Pass (calendar)	Not available	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00
Airport			
3-Hour Pass	\$6.30	3-Hour Pass/Day Pass	\$1.35
Day Pass (service day)	\$6.30	Day Pass (service day)	\$2.70
		Daily Fare Capping (service day)	\$2.70
Monthly Pass (calendar)	Not available	Monthly Pass (calendar)	\$27.00
		Monthly Fare Capping (calendar)	\$27.00

## 6.3 Media Distribution and Sales Outlets Changes

The proposed fare changes impact the fare payment types available through different sales channels.

Customers can currently purchase 10-Ride Ticket Books, Monthly Passes and Access-a-Ride Ticket Books at four RTD Sales Outlets: Civic Center Station, Union Station Bus Concourse, Downtown Boulder Station and Denver Airport Station. A fifth location is temporarily closed (Boulder Junction at Depot Square Station). Third Party Sales Outlets, which currently include King Soopers and Safeway stores, provide approximately 130 locations across the metro area for customers to purchase 10-Ride Ticket Books, Monthly Passes and Access-a-Ride Ticket Books.

Customers can purchase paper 10-Ride Ticket Books, paper Monthly Passes and Access-a-Ride Ticket Books via the RTD Online Store, and RTD sends the purchased fare products in the mail free of charge. These fare payment types will remain available at the RTD Online Store but the Regional versions of these fare products will be discontinued. Customers can currently purchase physical MyRide cards online through their MyRide account and will receive them in the mail free of charge. Customers will continue to have a way to order new MyRide cards online and receive them in the mail, via the RTD Online Store.

Customers can purchase mobile tickets and passes in the MyRide App or via the MyRide Website and use them in their MyRide App. Similarly, customers can manage their MyRide account and load value to their account in the MyRide App or via the MyRide Website. Cash as well as credit and debit card customers can load value to their MyRide accounts at RTD Sales Outlets. Customers who want to purchase tickets using stored value must convert the value loaded into their MyRide accounts to mobile tickets in the MyRide App or via the MyRide Website. With the launch of the new MyRide fare collection system, in addition to using the MyRide App, MyRide Smart Card customers can load value to their MyRide accounts and manage their accounts similar to MyRide App customers, although MyRide Smart Card customers cannot purchase mobile tickets to use with their MyRide Smart Card.

Customers are no longer able to obtain or reload the new MyRide Smart Cards at select Safeway and King Soopers stores, as they could previously. Customers will continue to be able to obtain and reload MyRide Smart Cards at RTD Sales Outlets. In the future, RTD plans to expand MyRide retail opportunities for the new MyRide fare

collection system. This expansion of retail opportunities, which is still being procured, is not included in this Fare Equity Analysis. Expanded retail opportunities for customers would require a future Title VI review.

Table 9 summarizes the proposed fare distribution changes for fare payment types available to the general public. All paper and mobile retail fare payment types will be available for purchase via the Bulk Purchase Program. RTD will distribute paper full fare 10-Ride Ticket Books via the Transit Assistance Grant Program.

**Table 9: Proposed Changes to Fare Distribution**

Fare Payment Type		Current	Proposed
<b>Full Fare</b>			
<b>3-Hour Pass</b>	Cash Onboard	✓	✓
	TVM	✓	✓
	Mobile Ticket (MyRide App and MyRide Website)	✓	✓
	MyRide Barcode (MyRide App)	Not available	✓
	MyRide Smart Card	✓	✓
<b>10-Ride Ticket Books</b>	RTD Sales Outlets	✓	✓
	Third Party Sales Outlets	✓	✓
	Mobile Ticket (MyRide App and MyRide Website)	✓	No longer available
	RTD Online Store	✓	✓
<b>Day Pass*</b>	Cash Onboard	✓	✓
	TVM	✓	✓
	Mobile Ticket (MyRide App and MyRide Website)	✓	✓
<b>Monthly Pass*</b>	RTD Sales Outlets	✓	✓
	Third Party Sales Outlets	✓	✓
	Mobile Ticket (MyRide App and MyRide Website)	✓	✓
	RTD Online Store	✓	✓
<b>MyRide Account Reload</b>	MyRide App	Mobile Tickets only	✓
	MyRide Website	✓	✓
	RTD Sales Outlets	✓	✓
	Third Party Sales Outlets	MyRide Smart Card only	No longer available
<b>* MyRide Daily and Monthly Fare Capping</b>			
MyRide Stored Value with Daily and Monthly Fare Capping		Not available	✓
<b>Seniors, Individuals with Disabilities and Youth</b>			
<b>3-Hour Pass</b>	Cash Onboard	✓	✓
	TVM	✓	✓
	Mobile Ticket (MyRide App and MyRide Website)	✓	✓
	MyRide Barcode (MyRide App)	Not available	✓
	MyRide Smart Card	✓	✓
<b>10-Ride Ticket Books</b>	RTD Sales Outlets	✓	✓
	Third Party Sales Outlets	✓	✓
	Mobile Ticket (MyRide App and MyRide Website)	✓	No longer available
	RTD Online Store	✓	✓
<b>Day Pass*</b>	Cash Onboard	✓	✓

Fare Payment Type	Current	Proposed
TVM	✓	✓
Mobile Ticket (MyRide App and MyRide Website)	✓	✓
<b>Monthly Pass*</b>		
RTD Sales Outlets	✓	✓
Third Party Sales Outlets	✓	✓
Mobile Ticket (MyRide App and MyRide Website)	✓	✓
RTD Online Store	✓	✓
<b>MyRide Account Reload</b>		
MyRide App	Mobile Tickets Only	✓
MyRide Website	✓	✓
RTD Sales Outlets	✓	✓
Third Party Sales Outlets	MyRide Smart Card only	No longer available
<b>* MyRide Daily and Monthly Fare Capping</b>		
MyRide Stored Value with Daily and Monthly Fare Capping	Not available	✓
<b>LiVE (Low-Income Fare Program)</b>		
<b>3-Hour Pass</b>		
Cash Onboard	Not available	Not available
TVM	Not available	Not available
Mobile Ticket (MyRide App and MyRide Website)	✓	✓
MyRide Barcode (MyRide App)	Not available	✓
MyRide Smart Card	✓	✓
<b>10-Ride Ticket Books</b>		
RTD Sales Outlets	✓	✓
Third Party Sales Outlets	✓	✓
Mobile Ticket (MyRide App and MyRide Website)	✓	No longer available
RTD Online Store	✓	✓
<b>Day Pass*</b>		
Cash Onboard	Not available	Not available
TVM	Not available	Not available
Mobile Ticket (MyRide App and MyRide Website)	✓	✓
<b>Monthly Pass*</b>		
RTD Sales Outlets	Not available	✓
Third Party Sales Outlets	Not available	✓
Mobile Ticket (MyRide App and MyRide Website)	Not available	✓
RTD Online Store	Not available	✓
<b>MyRide Account Reload</b>		
MyRide App	Mobile Tickets Only	✓
MyRide Website	✓	✓
RTD Sales Outlets	✓	✓
Third Party Sales Outlets	MyRide Smart Card only	No longer available
<b>* MyRide Daily and Monthly Fare Capping</b>		
MyRide Stored Value with Daily and Monthly Fare Capping	Not available	✓

Abbreviation: TVM = Ticket Vending Machine

## 6.4 Electronic Fare Media Policy Changes

Table 10 presents the proposed changes to RTD's electronic fare media policies.

**Table 10: Proposed Changes to Electronic Fare Media Policies**

Policy	Current	Proposed
<b>RTD MyRide App (formerly RTD Mobile Tickets App)</b>		
<b>App Cost</b>	<ul style="list-style-type: none"> <li>No cost for MyRide App</li> <li>Available from the Google Play and Apple App Store</li> <li>Data charges may apply</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>
<b>Account Registration</b>	<ul style="list-style-type: none"> <li>Account registration not required</li> <li>For those registering an account, an email address and password is required</li> <li>No entitlements on the account are required to purchase discounted mobile tickets for seniors, individuals with disabilities, Medicare recipients, LiVE customers and youth</li> </ul>	<ul style="list-style-type: none"> <li>Account registration not required to purchase mobile tickets. Account registration is required to create and use a MyRide Barcode and to use the MyRide App or MyRide Website to load stored value, register smart cards to the account, and add entitlements</li> <li>No change for entitlements to purchase discounted mobile tickets for seniors, individuals with disabilities, Medicare recipients, LiVE customers and youth (i.e., no entitlement on the account required)</li> <li>An entitlement on the MyRide account will be required to pay discounted fares with stored value using the MyRide Barcode in the MyRide App <ul style="list-style-type: none"> <li>Customers eligible to use senior or youth discounted fares will be able to add an entitlement to their MyRide Barcode. Youth entitlements will be valid through the last day of the month of their 20th birthday, and senior entitlements are valid for approximately 50 years</li> <li>Individuals with disabilities and LiVE customers will need to enter the number printed on their RTD-issued Special Discount Card or LiVE Eligibility Card. The system will provision a discount entitlement that expires on the expiration date of the card</li> </ul> </li> </ul>
<b>Passes Available</b>	<ul style="list-style-type: none"> <li>Mobile ticket types available: 3-Hour Pass, 10-Ride Ticket Books, Day Pass, Monthly Pass</li> <li>Discounted passes for seniors, individuals with disabilities, Medicare recipients, LiVE customers and youth available (although no LiVE Monthly Pass)</li> </ul>	<ul style="list-style-type: none"> <li>Mobile ticket types available: 3-Hour Pass, Day Pass, Monthly Pass</li> <li>LiVE Monthly Pass will be introduced; no change to the availability of other discounted passes</li> <li>Mobile 10-Ride Ticket Books will no longer be available; customers will be able to purchase multiple 3-Hour Passes</li> </ul>
<b>Mobile Ticket Purchases</b>	<ul style="list-style-type: none"> <li>Customers can purchase mobile tickets in the MyRide App and via the MyRide Website</li> <li>There is no minimum purchase requirement</li> </ul>	<ul style="list-style-type: none"> <li>No change to the methods to purchase mobile tickets</li> <li>No change to minimum purchase requirements</li> </ul>

Policy	Current	Proposed
	<ul style="list-style-type: none"> <li>Customers can purchase multiple mobile tickets in one transaction</li> </ul>	<ul style="list-style-type: none"> <li>No change to the ability to purchase multiple mobile tickets in one transaction</li> </ul>
<b>Multiple Rider Fares</b>	<ul style="list-style-type: none"> <li>Multiple tickets can be presented on a single smartphone in the MyRide App. A customer can purchase up to 10 mobile tickets per ticket type in a single purchase</li> </ul>	<ul style="list-style-type: none"> <li>Multiple customers can travel together using the same MyRide account through the MyRide App. There are several options:               <ul style="list-style-type: none"> <li>The account holder can purchase multiple mobile tickets and activate and present them on the same smartphone.</li> <li>The account holder can use the MyRide Barcode, and purchase mobile tickets for the other customers to activate and present on the account holder's smartphone.</li> <li>The account holder can use the MyRide Barcode, while other customers can use smart cards that are registered to the same account. In this case, customers can travel together or separately.</li> </ul> </li> </ul>
<b>Stored Value Load</b>	<ul style="list-style-type: none"> <li>Customers can load value through the MyRide App, MyRide Website and RTD Sales Outlets</li> <li>Stored value can then be used to purchase mobile tickets in the MyRide App and via the MyRide Website</li> <li>Minimum stored value load is the amount of the lowest fare, currently \$0.90</li> </ul>	<ul style="list-style-type: none"> <li>No change to the methods to load stored value</li> <li>Customers will continue to have the option to use their stored value to purchase mobile tickets. However, customers will also be able to use the stored value via the MyRide Barcode to pay the fare directly and benefit from fare capping rather than using the stored value to purchase mobile tickets</li> <li>Minimum stored value load will be the amount of the lowest fare, \$0.85 or \$1.35. When available, RTD may implement a higher minimum amount for stored value loads through the MyRide App or MyRide website.</li> <li>Long-term, customers will be able to load value via expanded retail opportunities to be determined. The evaluation of the expanded retail opportunity is not included in this Fare Equity Analysis. Any introduction of expanded retail opportunities would require a future Title VI review</li> </ul>
<b>Fare Capping</b>	<ul style="list-style-type: none"> <li>Not available</li> </ul>	<ul style="list-style-type: none"> <li>Fares for customers using MyRide Barcode in the MyRide App will be capped on a daily (service day) and monthly (calendar) basis</li> </ul>
<b>Balance Protection</b>	<ul style="list-style-type: none"> <li>Available to customers with registered accounts</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>
<b>Autoload</b>	<ul style="list-style-type: none"> <li>Not available</li> </ul>	<ul style="list-style-type: none"> <li>Autoload functionality is anticipated to be available</li> </ul>

Policy	Current	Proposed
<b>Negative Balance</b>	<ul style="list-style-type: none"> <li>Not available</li> </ul>	<ul style="list-style-type: none"> <li>For customers using MyRide Barcode and paying with stored value, they will not be able to start a new trip until they have replenished their stored value balance to at least \$0.01. The maximum negative balance will depend on the Rider Category (Full Fare, Discount or Youth) and the Fare Level (Local/Regional or Airport)</li> </ul>
<b>MyRide Smart Card</b>		
<b>Smart Card Fee and Access</b>	<ul style="list-style-type: none"> <li>No card fees for MyRide Smart Cards</li> <li>No replacement fees for lost or stolen MyRide Smart Cards</li> <li>\$0.01 minimum load required for MyRide Smart Cards purchased at RTD sales outlets. \$5 minimum load required for MyRide cards ordered online through a MyRide account</li> <li>MyRide Smart Cards are distributed at RTD Sales Outlets, and select Third Party Sales Outlets. Cards ordered online through a MyRide account are mailed to the customer free of charge</li> </ul>	<ul style="list-style-type: none"> <li>No change to new and replacement card fees for new MyRide Smart Cards</li> <li>The minimum load requirement will be the amount of the lowest fare, \$0.85 or \$1.35. When available, RTD may implement a higher minimum amount for stored value loads through the MyRide App or the MyRide Website</li> <li>MyRide Smart Cards will be distributed at RTD Sales Outlets. Cards ordered through the RTD Online Store will be mailed to the customer free of charge</li> <li>MyRide Smart Cards will no longer be distributed at Third Party Sales Outlets</li> </ul>
<b>Account Registration</b>	<ul style="list-style-type: none"> <li>No registration required</li> <li>The ability to pay discounted fare using stored value determined by the physical card</li> </ul>	<ul style="list-style-type: none"> <li>Account registration will be required to load value on the new MyRide Smart Cards through the MyRide App or Website. Customers will need to provide an email address in order to register for an account. Registration will not be required to load value at RTD Sales Outlets</li> <li>An entitlement on the MyRide card will be required to pay discounted fares with stored value using the new MyRide Smart Card <ul style="list-style-type: none"> <li>Customers eligible to use senior or youth discounted fares will be able to add an entitlement to their card. Youth entitlements will be valid through the last day of the month of their 20th birthday, and senior entitlements are valid for approximately 50 years</li> <li>Individuals with disabilities and LiVE customers will need to enter the number printed on their RTD-issued Special Discount Card or LiVE Eligibility Card. The system will provision a discount entitlement that expires on the expiration date of the card</li> </ul> </li> </ul>
<b>Passes Available</b>	<ul style="list-style-type: none"> <li>No passes available on MyRide Smart Card</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>

Policy	Current	Proposed
<b>Stored Value Load</b>	<ul style="list-style-type: none"> <li>Customers can load value through the old MyRide Website, RTD Sales Outlets, and select Third Party Sales Outlets</li> <li>Minimum stored value load is \$0.01 in person or \$5.00 online</li> </ul>	<ul style="list-style-type: none"> <li>Customers will be able to load value through the MyRide App, MyRide Website and RTD Sales Outlets. Account registration will be required to load value through the MyRide App or Website</li> <li>Minimum stored value load will be the amount of the lowest fare, \$0.85 or \$1.35. When available, RTD may implement a higher minimum amount for stored value loads through the MyRide app or MyRide Website</li> <li>Long-term, customers will be able to load value via expanded retail opportunities, to be determined. Expansion of retail opportunities is not included in this Fare Equity Analysis. Any introduction of expanded retail opportunities would require a future Title VI review</li> </ul>
<b>Fare Capping</b>	<ul style="list-style-type: none"> <li>Not available</li> </ul>	<ul style="list-style-type: none"> <li>Fares for customers using MyRide Smart Card will be capped on a daily (service day) and monthly (calendar) basis</li> </ul>
<b>Balance Protection</b>	<ul style="list-style-type: none"> <li>Available to customers with a registered account</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>
<b>Multiple Rider Fares</b>	<ul style="list-style-type: none"> <li>Each customer must have their own MyRide card</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>
<b>Autoload</b>	<ul style="list-style-type: none"> <li>Not available</li> </ul>	<ul style="list-style-type: none"> <li>Autoload functionality is anticipated to be available</li> </ul>
<b>Negative Balance</b>	<ul style="list-style-type: none"> <li>Not available</li> </ul>	<ul style="list-style-type: none"> <li>For customers using a MyRide card and paying with stored value, they will not be able to start a new trip until they have replenished their stored value balance to at least \$0.01. The maximum negative balance will depend on the Rider Category (Full Fare, Discount or Youth) and the Fare Level (Local/Regional or Airport)</li> </ul>



## 7 Fare Proposal Outreach

The following is a summary of themes across the feedback received.

### 7.1 Public Outreach Overview

In the fourth and final phase of public engagement for the RTD Systemwide Fare Study and Equity Analysis, customers and community members had the opportunity to provide feedback on the recommended changes to the fare structure, policies and programs through public comment. The public comment period was open from April 13 to May 24, 2023.

Public comment could be submitted in several formats, including:

- Online on the Fare Feedback website, which provided a comprehensive overview of the proposed fare changes
- Written on a paper comment form at Fare Study open houses, station pop-ups and community events
- Spoken out loud at one of four virtual public hearings

The public comment form asked for open-ended feedback on three topics: the recommended fare structure, recommended policies and programs and fare equity (Title VI Analysis). Participants could optionally include their name, organization with which they were affiliated, and demographic information (including racial and ethnic background, income, household size and age). A list of organizations represented and a summary of demographic information of the commenters are included in this summary.

Table 11 provides a summary of the outreach events and methods along with the estimated number of participants. Engagement opportunities and methods of promotion included:

- Virtual Public Hearings in English and Spanish
- In Person Open Houses with Spanish and American Sign Language Interpretation
- Community Events and Pop-Ups
- Community Partner Outreach
- Community Based Organization Outreach
- Digital Promotion
- Earned Media
- Informational Handouts Translated Into 23 Languages

The following sections include an overview of the public comment promotion, key themes that emerged from the comments and feedback received. **Appendix C** provides a full list of the comments as they were submitted (with translations).

**Table 11: Outreach events, methods and attendees**

Date and Time	Event	Address	Public Participation (Attendees)
4/6/2023	Colorado Rockies Home Opener	1900 Wazee Street, Denver	491
4/19/2023	The Road Ahead (hosted by Transportation Solutions)	2055 E Evans Avenue, Denver	100

<b>4/20/2023</b>	Transportation Management Association Monthly Outreach Meeting (hosted by DRCOG)	Virtual	21
<b>4/25/2023</b>	RTD Fare Study Pop-Up Event	Lincoln Station, 10203 Station Way, Lone Tree	9
<b>4/26/2023</b>	RTD Fare Study Pop-Up Event	Arapahoe at Village Center Station, 8800 E. Caley Way, Greenwood Village	39
<b>4/29/2023</b>	Adams 12 Five Star School District Wellness Festival	Riverdale Regional Park, 9755 Henderson Rd, Brighton	169
<b>4/29/2023</b>	Respect the Ride Community Event	Union Station, 1701 Wynkoop Street, Denver	65
<b>5/2/2023</b>	Public Hearing – Spanish	Virtual	16
<b>5/2/2023</b>	Denver Mobility Access Coalition Member Meeting	Virtual	16
<b>5/2/2023</b>	RTD Fare Study Pop-Up Event	Central Park Station, 8200 Smith Road, Denver	60
<b>5/3/2023</b>	Public Hearing – English	Virtual	16
<b>5/3/2023</b>	RTD Fare Study Pop-Up Event	US 36 and Sheridan Station, 5025 W 88 <sup>th</sup> Pl., Westminster	50
<b>5/4/2023</b>	RTD Fare Study Pop-Up Event	Union Station, 1701 Wynkoop Street, Denver	80
<b>5/6/2023</b>	Cinco de Mayo Festival	Civic Center Park, 101 14 <sup>th</sup> Ave, Denver	340
<b>5/8/2023</b>	Civic Academy	1001 17 <sup>th</sup> St, Denver	159
<b>5/9/2023</b>	RTD Fare Study Pop-Up Event	Littleton/Downtown Station, 5777 S. Prince Street, Littleton	13
<b>5/11/2023</b>	RTD Fare Study Pop-Up Event	Wagon Road Park-n-Ride, 600 W. 120 <sup>th</sup> Ave, Westminster	21
<b>5/11/2023</b>	RTD Fare Study – Open House	LoDo Towers, 1401 17 <sup>th</sup> St., Denver	17
<b>5/12/2023</b>	Jefferson County Older Adult Wellness Fair	Charles Whitlock Recreation Center, 1555 Dover St., Lakewood	
<b>5/14/2023</b>	Viva Streets Denver	Broadway at Bayaud Ave, Denver	150
<b>5/16/2023</b>	Storytime and FlexRides at the Broomfield Public Library	3 Community Park Road, Broomfield	159
<b>5/16/2023</b>	Public Hearing – Spanish	Virtual	12
<b>5/16/2023</b>	Public Hearing – English	Virtual	19
<b>5/16/2023</b>	Civic Academy	1001 17 <sup>th</sup> St, Denver	30
<b>5/17/2023</b>	RTD Fare Study – Open House	Carla Madison Rec Center, 2401 E Colfax Ave, Denver	24
<b>5/20/2023</b>	Northglenn Food Truck Carnival	Community Center Drive, Northglenn	66
<b>5/20/2023</b>	Adams County Connect Summer Kick-Off	Rotella Park, 1824 Coronado Parkway N, Denver	103
<b>5/20/2023</b>	Sun Valley Night Market	Empower Field at Mile High, Denver	113
<b>5/23/2023</b>	RTD Fare Study Pop-Up Event	Olde Town Arvada Station, 5575 Vance Street, Arvada	14
<b>5/24/2023</b>	Premier Members Credit Union Smart Commute Fair	360 Interlocken Boulevard, Broomfield	7
<b>5/24/2023</b>	RTD Fare Study Pop-Up Event	Federal Center Station, 11601 W. 2 <sup>nd</sup> Place, Lakewood	16

5/24/2023	Boulder County Farmers Market	13 <sup>th</sup> Street, Boulder	73
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## Demographic Data

When providing a public comment, community members were given the opportunity to provide demographic information, although doing so was optional and clearly denoted as such. Of the 731 comments submitted, 509 commenters provided demographic information. Data gathered included racial/ethnic background, age, annual household income and number of household residents. Several key demographic statistics about the commenters are outlined below.

### Demographic Data At-a-Glance

- 55% identify as Black, Indigenous or a Person of Color (not white/Caucasian)
- 41% identify as Hispanic/Latino
- 20% would qualify for age-based discounts
- 32% have an annual household income of less than \$10,000
- 50% have an annual household income of less than \$30,000
- 69% have an annual household income of less than \$70,000
- 50% live with 3 or more household members
- 25% of comments were submitted in Spanish

## 7.2 Summary of Public Comments

Through comments directly related to the fare study, significant support was provided for the components of the proposal. The following themes were present in the feedback:

### Fare Structure

There was significant support for changes to the fare structure that would support the fare study's goals of simplicity, affordability and equity. In total, 731 comments were submitted from a variety of methods. Additional comments unrelated to the fare structure study are not included.

- Simplicity: Participants expressed support for the consolidation of the Local and Regional fare levels, indicating this would provide much needed simplicity and benefit commuters who travel significant distances.
- Affordability: Many commenters expressed appreciation for the reduction in costs, particularly in an era of increasing inflation. In particular:
  - Commenters supported the decreased full fare monthly pass price (\$88) and discount monthly pass price (\$27), explaining that this would benefit frequent riders, particularly airport employees and regular DIA travelers with the inclusion of the Airport fare within the monthly pass.
  - Many comments noted that the lower monthly pass price made transit more cost competitive with driving and parking. Some previous customers indicated that the decrease in fares would encourage them to begin using RTD services again; commenters believed that may result in increased transit use/decrease car traffic and related environmental benefits.
  - Nonprofit staff members said that the price decreases would support the needs of their clients who may be transit-reliant or have limited financial resources.

- **Equity:** Commenters noted that transit-reliant equity populations would be well served by this recommendation. They indicated that changes to the fare structure and discount programs would allow individuals with disabilities, low-income customers, older adults, and community members who are unhoused to attend appointments, travel to work or school, and make other necessary trips without incurring significant cost burdens associated with transit. Others supported the incorporation of the LiVE discount into Access-a-Ride fares.

There were also some suggestions for further improvements to the fare structure, many of which were considered through the fare study process but found to be financially or operationally unfeasible.

- **Simplicity:** Many commenters urged RTD to have a single fare for all destinations, including the airport.
- **Affordability:** Many commenters urged RTD to further reduce prices or provide fare-free transit for all customers. Some commenters indicated the Airport fare (\$10) is still a financial burden and is not a cost-competitive option, especially for groups of individuals traveling together. Some also encouraged RTD to offer higher discounts for customers using Discount programs and suggested that discounts for older adults should start earlier to coincide with retirement.
- **Equity:** A number of commenters encouraged RTD to consider fares rounded to the nearest (and lowest) dollar to ensure customers using cash would not overpay for service – or to ensure drivers have change to offer to customers in return for overpayment. RTD was also encouraged to provide additional outreach for discount programs to ensure eligible customers were aware of their existence, with grocery stores, food banks and libraries listed as locations to promote information and possibly offer retail options for discount pass purchases. Additional feedback on how to more broadly approach RTD’s LiVE program is outlined below.

## Passes and Pass Programs

Commenters also provided support for current and proposed passes and programs.

### Zero Fare for Youth

Overwhelming enthusiasm was shown for the Zero Fare for Youth pilot program, noting that this would:

- Support youth in accessing school and work
- Benefit families who cannot afford fares for multiple children and incentivize larger families who see driving as a more affordable option
- Meet climate goals by encouraging additional ridership
- Provide youth with independence and agency
- Support lifelong transit use

Comments also encouraged RTD to seek long-term funding sources, potentially through the State of Colorado, to ensure the program lasts beyond the first year.

### Additional Passes and Programs

Commenters viewed the transit assistance grant program as a benefit for non-profit organizations with limited budgets who aim to support clients with travel needs to appointments, food banks, job interviews and others. They also voiced support for the updates to the EcoPass program and its positive impact on commuting employees.

RTD was also encouraged to consider other ways to decrease the cost of transit for commuting employees, including those traveling to the airport.

### LiVE Expansion Outreach Plan

Customers were encouraged to provide feedback on RTD's outreach plan for the proposed LiVE income-based fare discount program expansion as well as recommendations of organizations for RTD to partner with to increase awareness of the LiVE program. These included nonprofit organizations, libraries, college and schools, health care facilities and stores among others.

When asked who RTD should partner with to spread the information about the LiVE program, participants recommended partnering with nonprofits with Spanish speaking constituents, libraries, educational entities including Denver Public Schools, and healthcare facilities, including those who serve the Spanish speaking populations.

## 7.3 Changes to Proposal

In the fourth and final phase of the fare study and equity analysis, the public comments overall demonstrate public support for the recommended fare structure, policies and programs. Additionally, no items of significant concern were raised in public comments that suggest further review of the recommendation and its impacts on the community is necessary. As such, no changes are proposed to the Systemwide Fare Study and Fare Equity Analysis recommendations, and the final draft Title VI fare equity analysis will be presented to the RTD Board of Directors for review and adoption.

## 7.4 Board Adopted Fare Change

*[This section will be completed upon Board adoption.]*

## 8 Average Fare Analysis Findings

The Average Fare Analysis provides a robust overview of the proposed fare changes. The Average Fare Analysis analyzes the proposed fare changes described in Section 6, including the fare restructuring, price reduction, introduction of fare capping, and income eligibility expansion for RTD's low-income fare discount program (LiVE).

The Average Fare Analysis uncovered no Title VI equity concerns using RTD's Board-adopted Title VI Policies. While changes to some fare payment types would result in a greater percentage change for some populations, the aggregate, systemwide differences between all customers and minority customers and between all customers and low-income customers were within the 5% policy threshold. The proposed fare changes are expected to benefit minority customers and low-income customers to a lesser degree than all customers, but the difference in benefits do not exceed 5% on a systemwide basis. As such, no mitigations are recommended to proceed with the implementation of the proposed fare changes based on the Average Fare Analysis.

This Fare Equity Analysis and Average Fare Analysis did not evaluate a Zero Fare for Youth Pilot Program, LiVE access expansion beyond proposed changes in Section 6.1.5 or the expansion of a MyRide retail opportunities for cash customers. These items are discussed in Section 6.1.8. A separate Fare Equity Analysis may be required as RTD moves forward with the implementation of the Zero Fare for Youth Pilot Program or the expansion of MyRide retail opportunities, depending on the proposed changes. Nonetheless, these changes would likely benefit minority and low-income customers. As such, the Average Fare Analysis represented in this document likely understates potential upcoming benefits for minority and low-income customers.

It should also be noted that the introduction of the Transit Assistance Grant Program is not included in the Average Fare Analysis as the program is intended to generate new ridership, and grant recipients are to distribute the tickets at no cost to their clients.

### 8.1 Average Fare by Fare Level and Fare Payment Type

Overall, customers will experience a decrease in the average fare paid per boarding. As shown in Table 12, the systemwide average fare for all customers would decrease from \$1.41 to \$1.05 (25.4% decrease). The reduction in average fare varies dramatically by fare level (Local, Regional, Airport).

**Table 12: Change in Average Fare by Fare Level**

Fare Level	Average Fare per Boarding		Change in Average Fare	
	Current	Proposed	Absolute	Percentage
Local	\$1.00	\$0.83	-\$0.17	-17.0%
Regional	\$2.47	\$1.15	-\$1.31	-53.2%
Airport	\$4.67	\$3.50	-\$1.16	-24.9%
<b>Total</b>	<b>\$1.41</b>	<b>\$1.05</b>	<b>-\$0.36</b>	<b>-25.4%</b>

Customers paying the Regional fare experience significantly greater reductions in the average fare compared to customers paying the Local fare (Regional average fare decreases by \$1.31, while Local average fare decreases by \$0.17, for a difference of \$1.14). This is due to charging the Local fare for trips that previously required paying the Regional fare. Customers paying the Airport fare also experience greater reductions in the average fare compared to customers paying the Local fare. This is primarily due to the introduction of fare capping and the reduction in the Monthly Pass price resulting from reducing the Monthly Pass multiple and including travel to/from the Denver

International Airport with the Local Monthly Pass. It should also be noted that while the percentage decrease in the Regional average fare is significantly greater than the percentage decrease in the Airport average fare, the difference in absolute change is within \$0.15 (\$1.31 decrease in Regional average fare compared \$1.16 decrease in Airport average fare).

The proposed fare changes impact fare payment types differently as well. For each rider category, fare level and fare payment type, Table 13 provides the Average Fare per Boarding for the current and proposed fare structure as well as the Absolute Change and Percentage Change.

**Table 13: Change in Average Fare by Fare Payment Type**

Fare Payment Type	Average Fare per Boarding		Change in Average Fare	
	Current	Proposed	Absolute	Percentage
<b>Full Fare</b>				
<b>Local</b>				
3-Hour Pass	\$1.55	\$1.42	-\$0.13	-8.3%
Electronic 3-Hour Pass / Fare Capping	\$1.55	\$1.14	-\$0.41	-26.2%
10-Ride	\$1.55	\$1.53	-\$0.03	-1.8%
Day Pass	\$1.15	\$1.05	-\$0.10	-8.3%
Electronic Day Pass / Fare Capping	\$1.15	\$0.90	-\$0.25	-21.5%
Monthly Pass/Cap	\$1.25	\$0.96	-\$0.29	-22.8%
<b>Regional</b>				
3-Hour Pass	\$3.38	\$1.77	-\$1.61	-47.6%
Electronic 3-Hour Pass / Fare Capping	\$3.38	\$1.54	-\$1.84	-54.4%
10-Ride	\$3.30	\$1.80	-\$1.50	-45.5%
Day Pass	\$2.32	\$1.21	-\$1.10	-47.6%
Electronic Day Pass / Fare Capping	\$2.32	\$1.10	-\$1.22	-52.7%
Monthly Pass/Cap	\$3.29	\$1.45	-\$1.84	-56.0%
<b>Airport</b>				
Electronic 3-Hour Pass / Fare Capping	\$9.19	\$8.47	-\$0.72	-7.9%
Day Pass	\$4.72	\$4.50	-\$0.22	-4.8%
Electronic Day Pass / Fare Capping	\$4.72	\$2.98	-\$1.74	-36.8%
<b>Seniors and Individuals with Disabilities</b>				
<b>Local</b>				
3-Hour Pass	\$0.72	\$0.65	-\$0.07	-10.0%
Electronic 3-Hour Pass / Fare Capping	\$0.72	\$0.35	-\$0.37	-50.9%
10-Ride	\$0.76	\$0.74	-\$0.03	-3.6%
Day Pass	\$0.43	\$0.39	-\$0.04	-10.0%
Electronic Day Pass / Fare Capping	\$0.43	\$0.21	-\$0.22	-51.8%
Monthly Pass/Cap	\$0.56	\$0.27	-\$0.30	-52.6%
<b>Regional</b>				
3-Hour Pass	\$1.71	\$0.89	-\$0.82	-48.1%
Electronic 3-Hour Pass / Fare Capping	\$1.71	\$0.52	-\$1.20	-69.9%
10-Ride	\$1.55	\$0.83	-\$0.72	-46.5%
Day Pass	\$1.03	\$0.53	-\$0.50	-48.6%
Electronic Day Pass / Fare Capping	\$1.03	\$0.33	-\$0.71	-68.4%
Monthly Pass/Cap	\$1.69	\$0.46	-\$1.23	-72.7%
<b>Airport</b>				
Electronic 3-Hour Pass / Fare Capping	\$4.81	\$1.14	-\$3.67	-76.3%
Day Pass	\$1.34	\$0.69	-\$0.65	-48.6%
Electronic Day Pass / Fare Capping	\$1.34	\$0.45	-\$0.89	-66.7%
<b>Youth</b>				
<b>Local</b>				
3-Hour Pass	\$0.43	\$0.41	-\$0.02	-5.6%
Electronic 3-Hour Pass / Fare Capping	\$0.43	\$0.22	-\$0.21	-48.7%
10-Ride	\$0.50	\$0.47	-\$0.03	-5.6%
Day Pass	\$0.28	\$0.26	-\$0.02	-5.6%
Electronic Day Pass / Fare Capping	\$0.28	\$0.14	-\$0.14	-49.4%
Monthly Pass/Cap	\$0.34	\$0.27	-\$0.07	-21.1%
<b>Regional</b>				

Fare Payment Type	Average Fare per Boarding		Change in Average Fare	
	Current	Proposed	Absolute	Percentage
3-Hour Pass	\$1.05	\$0.56	-\$0.49	-46.9%
Electronic 3-Hour Pass / Fare Capping	\$1.05	\$0.33	-\$0.72	-68.5%
10-Ride	\$0.98	\$0.52	-\$0.46	-46.9%
Day Pass	\$0.63	\$0.33	-\$0.29	-46.9%
Electronic Day Pass / Fare Capping	\$0.63	\$0.20	-\$0.42	-67.4%
Monthly Pass/Cap	\$1.03	\$0.46	-\$0.56	-55.0%
<b>Airport</b>				
Electronic 3-Hour Pass / Fare Capping	\$2.72	\$0.68	-\$2.04	-75.0%
Day Pass	\$0.81	\$0.43	-\$0.38	-46.9%
Electronic Day Pass / Fare Capping	\$0.81	\$0.28	-\$0.53	-65.6%
<b>LiVE (Low-Income Fare Program)</b>				
<b>Local</b>				
Electronic 3-Hour Pass / Fare Capping	\$0.91	\$0.39	-\$0.52	-57.6%
10-Ride	\$0.98	\$0.74	-\$0.25	-25.0%
Electronic Day Pass / Fare Capping	\$0.52	\$0.21	-\$0.31	-59.8%
<b>Regional</b>				
Electronic 3-Hour Pass / Fare Capping	\$1.86	\$0.48	-\$1.38	-74.2%
10-Ride	\$1.93	\$0.83	-\$1.10	-57.1%
Electronic Day Pass / Fare Capping	\$1.30	\$0.34	-\$0.96	-73.7%
<b>Airport</b>				
Electronic 3-Hour Pass / Fare Capping	\$4.70	\$0.91	-\$3.78	-80.6%
Electronic Day Pass / Fare Capping	\$2.04	\$0.57	-\$1.47	-72.2%
<b>Full Fare -&gt; Expanded LiVE</b>				
<b>Local</b>				
Electronic 3-Hour Pass / Fare Capping	\$1.52	\$0.39	-\$1.13	-74.5%
10-Ride	\$1.54	\$0.74	-\$0.80	-51.8%
Electronic Day Pass / Fare Capping	\$0.87	\$0.21	-\$0.66	-75.9%
Monthly Pass/Cap	\$1.24	\$0.29	-\$0.95	-76.6%
<b>Regional</b>				
Electronic 3-Hour Pass / Fare Capping	\$2.85	\$0.44	-\$2.41	-84.5%
10-Ride	\$3.16	\$0.84	-\$2.32	-73.3%
Electronic Day Pass / Fare Capping	\$2.18	\$0.34	-\$1.84	-84.2%
Monthly Pass/Cap	\$3.48	\$0.46	-\$3.01	-86.6%
<b>Airport</b>				
Electronic 3-Hour Pass / Fare Capping	\$7.90	\$0.92	-\$6.98	-88.4%
Electronic Day Pass / Fare Capping	\$3.40	\$0.57	-\$2.83	-83.3%
<b>Other</b>				
<b>Local</b>				
Bulk Purchase	\$1.03	\$0.78	-\$0.25	-24.6%
EcoPass (Business)	\$2.07	\$1.90	-\$0.17	-8.3%
EcoPass (NECO)	\$1.42	\$1.74	\$0.33	23.2%
CollegePass	\$2.24	\$2.05	-\$0.19	-8.3%
Semester Pass	\$1.25	\$0.77	-\$0.48	-38.2%
<b>Regional</b>				
Bulk Purchase	\$2.28	\$0.92	-\$1.36	-59.5%
EcoPass (Business)	\$4.79	\$2.39	-\$2.41	-50.2%
EcoPass (NECO)	\$3.80	\$2.04	-\$1.76	-46.3%
CollegePass	\$4.51	\$2.22	-\$2.29	-50.8%
Semester Pass	n/a	n/a	n/a	n/a
<b>Airport</b>				
Bulk Purchase	n/a	n/a	n/a	n/a
EcoPass (Business)	\$5.57	\$2.59	-\$2.97	-53.4%
EcoPass (NECO)	\$8.99	\$2.50	-\$6.49	-72.2%
CollegePass	\$9.91	\$2.44	-\$7.47	-75.4%
Semester Pass	n/a	n/a	n/a	n/a

In addition to customers paying the Regional fare, customers using a Monthly Pass and customers using electronic fare media to purchase 3-Hour or Day Passes disproportionately benefit from the proposed fare changes. Monthly



Pass customers benefit from the lower Monthly Pass multiple. Customers using electronic fare media benefit from fare capping and the lower Monthly Pass multiple.

Local Neighborhood EcoPass is the one specific fare payment type that experiences an increase in the average fare; however, in aggregate, the NECO program experiences a 22% decrease in average fare when factoring in Airport and Regional trips. The average fare for NECO customers making a trip that requires the Local fare increases as a result of no longer taking into account fare discounts for youth, seniors and individuals with disabilities in contract pricing. However, NECO contracts are priced based on total ridership, and overall, the NECO program experiences a decrease in the average fare due to the discontinuation of applying the Regional and Airport fare to determine contract pricing (proposed fare change would price all trips at the Local, full fare for pass program pricing).

## 8.2 Average Fare Analysis Results

The Average Fare Analysis uncovered no Title VI equity concerns using RTD's Board adopted Title VI Policies, but does note that minority and low-income customers do not benefit as much as the overall population.

A reason that minority and low-income customers do not benefit as much as the overall population in the Average Fare Analysis is due to the composition of RTD's customer population and share of ridership by fare level. Minority and low-income customers rely much more heavily on Local fare level trips compared to all customers, as noted in Table 14. While the Average Fare Analysis findings suggest that minority and low-income customers do not benefit as much as the overall customer population due to the significant decreases in Regional and Airport fares, the proposed fare changes may actually lower financial barriers and improve mobility and access for these customer populations. By removing the Regional fare level and providing a lower priced Monthly Pass that is valid for travel anywhere in the RTD service area, the fare structure may allow customers to travel to parts of the region that they previously chose not to visit or may have been unable to due to the price of Regional and Airport fares. The Average Fare Analysis analyzes impacts on customers based on current travel behavior and does not attempt to forecast how proposed changes may alter future travel behavior or improve customer access.

**Table 14: Distribution of Customer Boardings by Fare Level**

Fare Level	% of Overall Customer Boardings	% of Minority Boardings	% of Low-Income Boardings
Local	83%	88%	92%
Regional	10%	8%	5%
Airport	7%	4%	3%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

**Appendix A** provides the detailed tables (Tables A-1 through A-4) that provide the average fare for each fare level (Local, Regional, Airport) and fare payment type under the current and proposed fare structure. A summary overview of the findings resulting from the change, including the Average Fare per Boarding, Absolute Change and Percentage Change are presented in Table 15 with the following description:

- Changes that represent a greater percentage decrease than the overall population (i.e., more beneficial for minority and/or low-income customers) are highlighted in green.
- Changes that represent a lesser percentage decrease than the overall population (i.e., less beneficial for minority and/or low-income customers) are highlighted in yellow.

- Changes that are outside the Disparate Impact/Disproportionate Burden threshold (+5%) are highlighted in light / deep red.
- Changes that are within 1% are considered to have similar impact and are not highlighted.

As noted in Section 4, the data and methodology used were developed to not overstate the potential benefits of the proposed fare changes for minority and low-income customers. An increase in the proportion of customers who are minority and/or low-income systemwide or among customers paying Regional fare as the result of the COVID impacts on ridership demographics, suburbanization of poverty or reduction of financial barriers to make longer distance trips with the removal of the Regional fare would increase the benefits of the proposed fare changes and reduce the difference between the overall customer population and minority and low-income customers. Further, increased electronic MyRide adoption among minority and/or low-income customers would increase the benefits of the proposed fare changes and reduce the difference between the overall customer population and minority and low-income customers.

Table 15: Summary Change in Average Fare Per Boarding

Change in Average Fare Per Boarding														
Fare Payment Type	All Customers				Minority Customers					Low-Income Customers				
	Change in Avg Fare per Boarding	% Change	Boardings	% of All Customer Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Minority Boardings	% of All Minority Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Low-Income Boardings	% of All Low-Income Boardings
Full Fare, 3-Hour Pass	-\$0.18	-11.1%	4,064,234	9.1%	-\$0.17	-10.8%	0.3%	1,853,187	11.2%	-\$0.19	-11.8%	-0.8%	1,928,997	12.1%
Full Fare, Electronic 3-Hour Pass / Fare Capping	-\$0.51	-29.4%	2,004,981	4.5%	-\$0.53	-30.7%	-1.3%	392,103	2.4%	-\$0.46	-28.1%	1.3%	331,099	2.1%
Full Fare, 10-Ride	-\$0.15	-8.8%	1,043,144	2.3%	-\$0.10	-5.9%	2.9%	428,836	2.6%	-\$0.04	-2.8%	6.0%	347,560	2.2%
Full Fare, Day Pass	-\$0.20	-9.3%	6,668,035	14.9%	-\$0.16	-9.6%	-0.2%	3,025,714	18.3%	-\$0.14	-9.0%	0.4%	2,424,610	15.3%
Full Fare, Electronic Day Pass / Fare Capping	-\$0.80	-38.5%	3,486,202	7.8%	-\$0.55	-34.4%	4.1%	1,164,147	7.0%	-\$0.53	-31.0%	7.5%	555,044	3.5%
Full Fare, Monthly Pass/Cap	-\$0.50	-32.5%	3,868,881	8.6%	-\$0.46	-31.0%	1.5%	1,372,748	8.3%	-\$0.36	-26.9%	5.6%	901,947	5.7%
LIVE, Electronic 3-Hour Pass / Fare Capping	-\$0.61	-60.4%	124,683	0.3%	-\$0.61	-60.4%	0.0%	60,735	0.4%	-\$0.61	-60.4%	0.0%	107,603	0.7%
LIVE, 10-Ride	-\$0.32	-30.1%	4,104	0.0%	-\$0.32	-30.1%	0.0%	1,999	0.0%	-\$0.32	-30.1%	0.0%	3,541	0.0%
LIVE, Electronic Day Pass / Fare Capping	-\$0.39	-63.3%	190,086	0.4%	-\$0.39	-63.3%	0.0%	92,593	0.6%	-\$0.39	-63.3%	0.0%	164,046	1.0%
Full Fare -> Expanded LIVE, Electronic 3-Hour Pass / Fare Capping	-\$1.20	-75.5%	15,544	0.0%	-\$1.16	-75.0%	0.6%	8,036	0.0%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LIVE, 10-Ride	-\$0.86	-53.4%	518	0.0%	-\$0.82	-52.6%	0.9%	270	0.0%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LIVE, Electronic Day Pass / Fare Capping	-\$0.75	-77.3%	23,102	0.1%	-\$0.70	-76.5%	0.7%	11,771	0.1%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LIVE, Monthly Pass/Cap	-\$1.08	-78.1%	17,291	0.0%	-\$1.01	-77.3%	0.8%	8,884	0.1%	n/a	n/a	n/a	-	0.0%
Youth, 3-Hour Pass	-\$0.03	-7.0%	1,157,628	2.6%	-\$0.03	-7.0%	0.0%	530,072	3.2%	-\$0.03	-7.0%	0.0%	544,022	3.4%
Youth, Electronic 3-Hour Pass / Fare Capping	-\$0.23	-50.7%	519,059	1.2%	-\$0.23	-50.7%	0.0%	100,928	0.6%	-\$0.23	-50.7%	0.0%	88,982	0.6%
Youth, 10-Ride	-\$0.04	-8.4%	293,738	0.7%	-\$0.04	-8.4%	0.0%	125,506	0.8%	-\$0.04	-8.4%	0.0%	105,517	0.7%
Youth, Day Pass	-\$0.07	-20.2%	977,338	2.2%	-\$0.07	-20.2%	0.0%	542,966	3.3%	-\$0.07	-20.2%	0.0%	463,609	2.9%
Youth, Electronic Day Pass / Fare Capping	-\$0.22	-57.9%	636,671	1.4%	-\$0.22	-57.9%	0.0%	297,113	1.8%	-\$0.22	-57.9%	0.0%	153,273	1.0%
Youth, Monthly Pass/Cap	-\$0.08	-23.5%	3,278,599	7.3%	-\$0.08	-23.5%	0.0%	1,197,662	7.2%	-\$0.08	-23.5%	0.0%	839,448	5.3%
Senior/Disabled, 3-Hour Pass	-\$0.09	-11.8%	1,380,298	3.1%	-\$0.07	-10.2%	1.6%	544,688	3.3%	-\$0.08	-10.4%	1.4%	717,243	4.5%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	-\$0.46	-55.3%	376,103	0.8%	-\$0.39	-51.9%	3.4%	141,879	0.9%	-\$0.38	-51.7%	3.5%	187,049	1.2%
Senior/Disabled, 10-Ride	-\$0.06	-7.3%	513,507	1.1%	-\$0.05	-6.5%	0.8%	156,459	0.9%	-\$0.04	-4.7%	2.6%	237,795	1.5%
Senior/Disabled, Day Pass	-\$0.12	-22.6%	3,218,739	7.2%	-\$0.11	-20.4%	2.2%	1,062,589	6.4%	-\$0.09	-17.9%	4.6%	1,500,417	9.5%
Senior/Disabled, Electronic Day Pass / Fare Capping	-\$0.41	-61.2%	723,994	1.6%	-\$0.38	-60.4%	0.8%	230,983	1.4%	-\$0.35	-59.1%	2.1%	309,364	1.9%
Senior/Disabled, Monthly Pass/Cap	-\$0.37	-56.6%	3,850,899	8.6%	-\$0.34	-55.2%	1.5%	1,223,565	7.4%	-\$0.33	-54.5%	2.2%	2,383,216	15.0%
Bulk Purchase	-\$0.31	-28.2%	2,839,410	6.3%	-\$0.29	-27.1%	1.1%	1,023,160	6.2%	-\$0.27	-25.8%	2.4%	1,008,397	6.4%
EcoPass (Business)	-\$1.20	-35.9%	2,650,675	5.9%	-\$1.48	-40.1%	-4.2%	617,285	3.7%	-\$1.77	-43.6%	-7.7%	186,283	1.2%
EcoPass (NECO)	-\$0.51	-21.6%	175,506	0.4%	-\$0.27	-13.0%	8.5%	25,821	0.2%	\$0.03	1.9%	23.4%	47,580	0.3%
CollegePass	-\$0.99	-32.0%	714,662	1.6%	-\$0.74	-26.0%	6.0%	267,352	1.6%	-\$0.66	-24.1%	7.9%	321,626	2.0%
Semester Pass	-\$0.48	-38.2%	37,702	0.1%	-\$0.48	-38.2%	0.0%	15,022	0.1%	-\$0.48	-38.2%	0.0%	18,851	0.1%
<b>Total</b>	<b>-\$0.36</b>	<b>-25.4%</b>	<b>44,855,331</b>	<b>100%</b>	<b>-\$0.29</b>	<b>-23.1%</b>	<b>2.3%</b>	<b>16,524,071</b>	<b>100.0%</b>	<b>-\$0.24</b>	<b>-22.0%</b>	<b>3.4%</b>	<b>15,877,120</b>	<b>100.0%</b>
<div>More Beneficial</div> <div>Same</div> <div>Less Beneficial</div> <div>Much Less Beneficial</div> <div>Worse</div>														

## 8.2.1 Key Findings

The key findings are reflected below:

- When viewing the fare change from a total system perspective, the average fare for the proposed change is \$1.05 per boarding for all customers, \$0.97 for minority customers (8% lower than for all customers) and \$0.84 for low-income customers (20% lower than for all customers).
- As a whole, minority and low-income populations experience a smaller decrease in their average fare than the overall customer population. Minority customers experience a 23.1% decrease in their average fare per boarding and low-income customers experience a 22.0% decrease, compared with a 25.4% decrease experienced by the overall customer population. It is important to note that each group (overall, minority and low-income) is anticipated to see an average fare per boarding decrease of 22% or greater.
- A significant reason for the overall customer population experiencing greater average fare benefits compared to minority and low-income customers is that the proposed fare changes disproportionately benefit customers paying the Regional fare, which is disproportionately non-minority and non-low-income according to the 2019 CSS.
  - Regional boardings represent 8% of minority customer boardings and 5% of low-income customer boardings, but represent 10% of boardings for the overall customer population.
- Low-income customers do not benefit from the income eligibility expansion for the LiVE Program. The proposed fare change increases the household income limit from 185% of the federal poverty level to 250% of the federal poverty level. Both of these income limits exceed the income threshold of 150% of federal poverty level established by RTD Title VI Policies and used for the purposes of this Fare Equity Analysis.
- Minority and low-income customers do not benefit as greatly as the overall customer population from the introduction of fare capping given their lower electronic fare adoption.
  - For full fare, 34% of overall 3-Hour and Day Pass boardings are made with electronic fares, while this decreases to 24% and 17% for minority and low-income customers, respectively.
- The proposed changes to the Business EcoPass program result in minority and low-income customers benefiting more than the overall customer population. This is largely a function of the demographics and proposed changes to the Airport portion of the Business EcoPass program. Within the Business EcoPass program, the Airport fare level has a significantly higher share of minority and low-income customers than the Local and Regional fare levels, and the Airport fare level for Business EcoPass has the largest anticipated percentage decrease in average fare resulting in a greater benefit for minority and low-income customers.
- The proposed changes to the CollegePass program result in minority and low-income customers benefiting less than the overall customer population. This is largely a result of the fact that the Local fare level has the highest proportion of minority and low-income customers, yet is anticipated to experience a relatively low percentage decrease in average fare. Regional and Airport fare levels have much larger shares of non-minority and non-low-income customers, yet are anticipated to experience much higher percentage decreases in average fare. It is important to remember that the structure of CollegePass contracts is such that all utilization across all customer populations at a college (minority, non-minority,

low-income, non-low-income) is aggregated together and all students pay an identical price. In this sense, minority and low-income customers at a given college will pay an identical amount as their fellow non-minority and non-low-income students.

- As noted in Table 15, the only group that is anticipated to experience an increase in their average fare in the study are low-income Neighborhood EcoPass (NECO) program customers. The estimated change in average fare per boarding for these customers is \$0.03. Proposed changes are expected to result in minority customers also benefiting less than the overall NECO customer population. Low-income NECO customers in particular disproportionately rely on the Local fare level within the NECO program (90% of Low-Income NECO boardings are Local vs. 73% of overall NECO boardings), yet the Local fare level for NECO is the one that is anticipated to experience a sizable increase in average fare due to the proposal to no longer take into account fare discounts for youth, seniors and individuals with disabilities in contract pricing. While the Average Fare Analysis suggests that low-income and minority NECO customers are anticipated to benefit less than the overall population of NECO customers, it is important to remember that all utilization across all customer populations (minority, non-minority, low-income, non-low-income) is aggregated together and all households in the same neighborhood pay an identical amount.

## 8.2.2 Overview of Overall Findings

Table 16 provides the systemwide analysis comparing the average fare for minority customers to the overall customer population. For minority customers, the average fare decreases from \$1.26 to \$0.97, a 23.1% decrease. For all customers, the average fare decreases from \$1.41 to \$1.05, a 25.4% decrease. The percentage point difference between the percentage change for minority customers and all customers is +2.3%, indicating that while both groups experience a decrease in their average fare, all customers are expected to benefit somewhat more than minority customers as a result of the proposed fare changes. Applying this difference in average fare changes to RTD's Disparate Impact Burden threshold, the fare changes do not represent a Disparate Impact on minority customers as the percentage point difference in percentage change in average fare from the proposed fare changes does not exceed RTD's 5% threshold.

**Table 16: Average Fare for Minority Customers**

All Customers			Minority Customers		
Number of Boardings	Current Average Fare	Proposed Average Fare	Number of Boardings	Current Average Fare	Proposed Average Fare
44,855,331	\$1.41	\$1.05	16,524,071	\$1.26	\$0.97
% Change in Average Fare		-25.4%	% Change in Average Fare		-23.1%
Difference between Minority Customers and All Customers					2.3%

Table 17 presents the systemwide analysis comparing the average fare for low-income customers to the overall customer population. For low-income customers, the average fare decreases from \$1.08 to \$0.84, a 22.0% decrease. For all customers, the average fare decreases from \$1.41 to \$1.05, a 25.4% decrease. The percentage point difference between the percentage change for low-income customers and all customers is +3.4%, indicating that while both groups experience a decrease in their average fare, all customers are expected to benefit more than low-income customers as a result of the proposed fare changes. Applying this difference in average fare changes to RTD's Disproportionate Burden threshold, the fare changes do not represent a Disproportionate

Burden on low-income customers as the percentage point difference in percentage change in average fare from the proposed fare changes does not exceed RTD's 5% threshold.

**Table 17: Average Fare for Low-Income Customers**

All Customers			Low-Income Customers		
Number of Boardings	Current Average Fare	Proposed Average Fare	Number of Boardings	Current Average Fare	Proposed Average Fare
44,855,331	\$1.41	\$1.05	15,877,120	\$1.08	\$0.84
% Change in Average Fare		-25.4%	% Change in Average Fare		-22.0%
Difference between Low-Income Customers and All Customers					3.4%

As previously noted, individuals with a household income up to 250% of the federal poverty level will be eligible for the expanded LiVE Program, which exceeds the low-income threshold of 150% of the federal poverty level established in RTD's Title VI Policies. As such, there are individuals in the Average Fare Analysis that are classified as non-low-income but will benefit from the income eligibility expansion for the LiVE Program.

## 9 Cumulative Findings and Mitigations

A Fare Equity Analysis should not take the place of thoughtful planning at the earliest stages of project development. Considering the impacts that plans, programs or projects have on minority and low-income communities has been part of the early planning and development process for the Systemwide Fare Study and Equity Analysis and the study's recommendations.

Even though RTD's ridership is not homogenous in terms of ethnicity, income, payment methods or fare type, the proposed fare changes do not appear to create any Disparate Impacts on minority communities, nor does it appear to create any Disproportionate Burdens on low-income communities. As such, no mitigations are needed in order to proceed with the implementation of the proposed fare changes.

Equity was the primary goal for the Systemwide Fare Study and Equity Analysis. As changes to RTD's fare structure, pricing and system were considered to achieve other study goals including Affordability and Simplicity, the impacts of these potential changes on minority and low-income communities were continually examined. The study relied on a community-driven process, focused on Title VI and historically underrepresented populations. Customer, community and stakeholder engagements were undertaken to identify unmet needs and potential impacts and to obtain fare structure preferences among minority and low-income communities.

## 10 Next Steps

It is important to note that this Fare Equity Analysis represents the impacts associated with the proposed fare changes upon full implementation as adopted by the Board of Directors. As such, should any of the proposed changes be determined to be technically or administratively unfeasible, a new Fare Equity Analysis would be required for any proposed changes to the adopted program in order to comply with federal Title VI guidance. Additionally, if the agency implements the fare change in a way that is inconsistent with what was adopted, the agency may need to undertake a new Fare Equity Analysis.

While no adverse impacts on minority and low-income customers were identified, RTD continues to focus on initiatives that support the customer experience for minority and low-income customers. As discussed in Section 6.1.8, RTD is looking at expanded MyRide retail opportunities for customers who prefer to pay with cash, and are developing a public outreach and engagement plan to promote the LiVE program (**See Appendix B**) throughout the region. Both of these initiatives are expected to improve the customer experience for minority and low-income customers.

It should also be noted that this Fare Equity Analysis does not evaluate a Zero Fare for Youth Pilot Program or expansion of MyRide retail opportunities for cash customers. A separate Fare Equity Analysis for these may be required as applicable. The Fare Equity Analysis also did not examine administrative programs that are being contemplated or developed for the expansion of means testing beyond the current system used in the LiVE Program, or programs intended to improve outreach and engagement to promote the LiVE Program. Should the criteria for LiVE eligibility change, a Title VI Fare Equity Analysis would be required.



Appendix A: Detailed Average Fare Analysis Tables

Table A-1: Average Fare Analysis – Local (Current)

Current Fare Structure													
	All Customers				Minority Customers					Low-Income Customers			
Fare Payment Type	Avg Fare per Boarding	Boardings	% of All Customer Boardings	% of Boardings in Service Category	Avg Fare per Boarding	Minority Boardings	% of All Minority Boardings	% of Minority Boardings in Service Category		Avg Fare per Boarding	Low-Income Boardings	% of All Low-Income Boardings	% of Low-Income Boardings in Service Category
Full Fare, 3-Hour Pass	\$1.55	3,929,437	8.8%	10.6%	\$1.55	1,799,268	10.9%	12.4%		\$1.55	1,846,620	11.6%	12.6%
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$1.55	1,845,330	4.1%	5.0%	\$1.55	358,814	2.2%	2.5%		\$1.55	316,342	2.0%	2.2%
Full Fare, 10-Ride	\$1.55	957,291	2.1%	2.6%	\$1.55	409,024	2.5%	2.8%		\$1.55	343,881	2.2%	2.4%
Full Fare, Day Pass	\$1.15	4,489,463	10.0%	12.1%	\$1.15	2,494,146	15.1%	17.2%		\$1.15	2,129,617	13.4%	14.6%
Full Fare, Electronic Day Pass / Fare Capping	\$1.15	1,786,444	4.0%	4.8%	\$1.15	833,674	5.0%	5.8%		\$1.15	430,070	2.7%	2.9%
Full Fare, Monthly Pass/Cap	\$1.25	3,344,663	7.5%	9.0%	\$1.25	1,221,795	7.4%	8.4%		\$1.25	856,363	5.4%	5.9%
LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.91	116,749	0.3%	0.3%	\$0.91	56,870	0.3%	0.4%		\$0.91	100,756	0.6%	0.7%
LiVE, 10-Ride	\$0.98	3,742	0.0%	0.0%	\$0.98	1,823	0.0%	0.0%		\$0.98	3,229	0.0%	0.0%
LiVE, Electronic Day Pass / Fare Capping	\$0.52	168,826	0.4%	0.5%	\$0.52	82,237	0.5%	0.6%		\$0.52	145,699	0.9%	1.0%
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	\$1.52	14,792	0.0%	0.0%	\$1.52	7,864	0.0%	0.1%		n/a	-	0.0%	0.0%
Full Fare -> Expanded Live, 10-Ride	\$1.54	498	0.0%	0.0%	\$1.54	265	0.0%	0.0%		n/a	-	0.0%	0.0%
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Capi	\$0.87	21,430	0.0%	0.1%	\$0.87	11,393	0.1%	0.1%		n/a	-	0.0%	0.0%
Full Fare -> Expanded LiVE, Monthly Pass/Cap	\$1.24	16,249	0.0%	0.0%	\$1.24	8,639	0.1%	0.1%		n/a	-	0.0%	0.0%
Youth, 3-Hour Pass	\$0.43	1,141,147	2.5%	3.1%	\$0.43	522,525	3.2%	3.6%		\$0.43	536,277	3.4%	3.7%
Youth, 10-Ride	\$0.50	283,328	0.6%	0.8%	\$0.50	121,059	0.7%	0.8%		\$0.50	101,778	0.6%	0.7%
Youth, Day Pass	\$0.28	797,916	1.8%	2.2%	\$0.28	443,287	2.7%	3.1%		\$0.28	378,499	2.4%	2.6%
Youth, Electronic Day Pass / Fare Capping	\$0.28	458,032	1.0%	1.2%	\$0.28	213,748	1.3%	1.5%		\$0.28	110,267	0.7%	0.8%
Youth, Monthly Pass/Cap	\$0.34	3,197,709	7.1%	8.6%	\$0.34	1,168,113	7.1%	8.1%		\$0.34	818,737	5.2%	5.6%
Senior/Disabled, 3-Hour Pass	\$0.72	1,351,845	3.0%	3.7%	\$0.72	543,265	3.3%	3.8%		\$0.72	713,896	4.5%	4.9%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.72	348,960	0.8%	0.9%	\$0.72	140,236	0.8%	1.0%		\$0.72	184,282	1.2%	1.3%
Senior/Disabled, 10-Ride	\$0.76	490,707	1.1%	1.3%	\$0.76	150,987	0.9%	1.0%		\$0.76	234,686	1.5%	1.6%
Senior/Disabled, Day Pass	\$0.43	2,708,894	6.0%	7.3%	\$0.43	923,487	5.6%	6.4%		\$0.43	1,354,447	8.5%	9.3%
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.43	465,681	1.0%	1.3%	\$0.43	158,755	1.0%	1.1%		\$0.43	232,840	1.5%	1.6%
Senior/Disabled, Monthly Pass/Cap	\$0.56	3,558,068	7.9%	9.6%	\$0.56	1,167,491	7.1%	8.1%		\$0.56	2,306,155	14.5%	15.8%
Bulk Purchase	\$1.03	2,699,103	6.0%	7.3%	\$1.03	988,050	6.0%	6.8%		\$1.03	992,518	6.3%	6.8%
EcoPass (Business)	\$2.07	1,593,977	3.6%	4.3%	\$2.07	310,278	1.9%	2.1%		\$2.07	76,511	0.5%	0.5%
EcoPass (NECO)	\$1.42	128,295	0.3%	0.3%	\$1.42	19,738	0.1%	0.1%		\$1.42	42,765	0.3%	0.3%
CollegePass	\$2.24	535,105	1.2%	1.4%	\$2.24	213,206	1.3%	1.5%		\$2.24	267,553	1.7%	1.8%
Semester Pass	\$1.25	37,702	0.1%	0.1%	\$1.25	15,022	0.1%	0.1%		\$1.25	18,851	0.1%	0.1%
Total, Local	\$1.00	36,989,263	82.5%	100.0%	\$0.99	14,481,868	87.6%	100.0%		\$0.92	14,627,990	92.1%	100.0%

\*Assumes average fare of eligible population

Table A-1: Average Fare Analysis – Local (Proposed)

Proposed Fare Structure									
	All Customers			Minority Customers			Low-Income Customers		
Fare Payment Type	Avg Fare per Boarding	Boardings		Avg Fare per Boarding	Minority Boardings		Avg Fare per Boarding	Low-Income Boardings	
Full Fare, 3-Hour Pass	\$1.42	3,929,437		\$1.42	1,799,268		\$1.42	1,846,620	
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$1.14	1,845,330		\$1.14	358,814		\$1.14	316,342	
Full Fare, 10-Ride	\$1.53	957,291		\$1.53	409,024		\$1.53	343,881	
Full Fare, Day Pass	\$1.05	4,489,463		\$1.05	2,494,146		\$1.05	2,129,617	
Full Fare, Electronic Day Pass / Fare Capping	\$0.90	1,786,444		\$0.90	833,674		\$0.90	430,070	
Full Fare, Monthly Pass/Cap	\$0.96	3,344,663		\$0.96	1,221,795		\$0.96	856,363	
LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.39	116,749		\$0.39	56,870		\$0.39	100,756	
LiVE, 10-Ride	\$0.74	3,742		\$0.74	1,823		\$0.74	3,229	
LiVE, Electronic Day Pass / Fare Capping	\$0.21	168,826		\$0.21	82,237		\$0.21	145,699	
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	\$0.39	14,792		\$0.39	7,864		n/a	-	
Full Fare -> Expanded Live, 10-Ride	\$0.74	498		\$0.74	265		n/a	-	
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Cappi	\$0.21	21,430		\$0.21	11,393		n/a	0	
Full Fare -> Expanded LiVE, Monthly Pass/Cap	\$0.29	16,249		\$0.29	8,639		n/a	-	
Youth, 3-Hour Pass	\$0.41	1,141,147		\$0.41	522,525		\$0.41	536,277	
Youth, Electronic 3-Hour Pass / Fare Capping	\$0.22	497,882		\$0.22	96,810		\$0.22	85,351	
Youth, 10-Ride	\$0.47	283,328		\$0.47	121,059		\$0.47	101,778	
Youth, Day Pass	\$0.26	797,916		\$0.26	443,287		\$0.26	378,499	
Youth, Electronic Day Pass / Fare Capping	\$0.14	458,032		\$0.14	213,748		\$0.14	110,267	
Youth, Monthly Pass/Cap	\$0.27	3,197,709		\$0.27	1,168,113		\$0.27	818,737	
Senior/Disabled, 3-Hour Pass	\$0.65	1,351,845		\$0.65	543,265		\$0.65	713,896	
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.35	348,960		\$0.35	140,236		\$0.35	184,282	
Senior/Disabled, 10-Ride	\$0.74	490,707		\$0.74	150,987		\$0.74	234,686	
Senior/Disabled, Day Pass	\$0.39	2,708,894		\$0.39	923,487		\$0.39	1,354,447	
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.21	465,681		\$0.21	158,755		\$0.21	232,840	
Senior/Disabled, Monthly Pass/Cap	\$0.27	3,558,068		\$0.27	1,167,491		\$0.27	2,306,155	
Bulk Purchase	\$0.78	2,699,103		\$0.78	988,050		\$0.78	992,518	
EcoPass (Business)	\$1.90	1,593,977		\$1.90	310,278		\$1.90	76,511	
EcoPass (NECO)	\$1.74	128,295		\$1.74	19,738		\$1.74	42,765	
CollegePass	\$2.05	535,105		\$2.05	213,206		\$2.05	267,553	
Semester Pass	\$0.77	37,702		\$0.77	15,022		\$0.77	18,851	
Total, Local	\$0.83	36,989,263		\$0.83	14,481,868		\$0.76	14,627,990	

Table A-1: Average Fare Analysis – Local (Change in Average Fare per Boarding)

Change in Average Fare Per Boarding														
Fare Payment Type	All Customers				Minority Customers					Low-Income Customers				
	Change in Avg Fare per Boarding	% Change	Boardings	% of All Customer Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Minority Boardings	% of All Minority Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Low-Income Boardings	% of All Low-Income Boardings
Full Fare, 3-Hour Pass	-\$0.13	-8.3%	3,929,437	8.8%	-\$0.13	-8.3%		1,799,268	10.9%	-\$0.13	-8.3%		1,846,620	11.6%
Full Fare, Electronic 3-Hour Pass / Fare Capping	-\$0.41	-26.2%	1,845,330	4.1%	-\$0.41	-26.2%		358,814	2.2%	-\$0.41	-26.2%		316,342	2.0%
Full Fare, 10-Ride	-\$0.03	-1.8%	957,291	2.1%	-\$0.03	-1.8%		409,024	2.5%	-\$0.03	-1.8%		343,881	2.2%
Full Fare, Day Pass	-\$0.10	-8.3%	4,489,463	10.0%	-\$0.10	-8.3%		2,494,146	15.1%	-\$0.10	-8.3%		2,129,617	13.4%
Full Fare, Electronic Day Pass / Fare Capping	-\$0.25	-21.5%	1,786,444	4.0%	-\$0.25	-21.5%		833,674	5.0%	-\$0.25	-21.5%		430,070	2.7%
Full Fare, Monthly Pass/Cap	-\$0.29	-22.8%	3,344,663	7.5%	-\$0.29	-22.8%		1,221,795	7.4%	-\$0.29	-22.8%		856,363	5.4%
LiVE, Electronic 3-Hour Pass / Fare Capping	-\$0.52	-57.6%	116,749	0.3%	-\$0.52	-57.6%		56,870	0.3%	-\$0.52	-57.6%		100,756	0.6%
LiVE, 10-Ride	-\$0.25	-25.0%	3,742	0.0%	-\$0.25	-25.0%		1,823	0.0%	-\$0.25	-25.0%		3,229	0.0%
LiVE, Electronic Day Pass / Fare Capping	-\$0.31	-59.8%	168,826	0.4%	-\$0.31	-59.8%		82,237	0.5%	-\$0.31	-59.8%		145,699	0.9%
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	-\$1.13	-74.5%	14,792	0.0%	-\$1.13	-74.5%		7,864	0.0%	n/a	n/a		-	0.0%
Full Fare -> Expanded Live, 10-Ride	-\$0.80	-51.8%	498	0.0%	-\$0.80	-51.8%		265	0.0%	n/a	n/a		-	0.0%
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Cappi	-\$0.66	-75.9%	21,430	0.0%	-\$0.66	-75.9%		11,393	0.1%	n/a	n/a		-	0.0%
Full Fare -> Expanded LiVE, Monthly Pass/Cap	-\$0.95	-76.6%	16,249	0.0%	-\$0.95	-76.6%		8,639	0.1%	n/a	n/a		-	0.0%
Youth, 3-Hour Pass	-\$0.02	-5.6%	1,141,147	2.5%	-\$0.02	-5.6%		522,525	3.2%	-\$0.02	-5.6%		536,277	3.4%
Youth, Electronic 3-Hour Pass / Fare Capping	-\$0.21	-48.7%	497,882	1.1%	-\$0.21	-48.7%		96,810	0.6%	-\$0.21	-48.7%		85,351	0.5%
Youth, 10-Ride	-\$0.03	-5.6%	283,328	0.6%	-\$0.03	-5.6%		121,059	0.7%	-\$0.03	-5.6%		101,778	0.6%
Youth, Day Pass	-\$0.02	-5.6%	797,916	1.8%	-\$0.02	-5.6%		443,287	2.7%	-\$0.02	-5.6%		378,499	2.4%
Youth, Electronic Day Pass / Fare Capping	-\$0.14	-49.4%	458,032	1.0%	-\$0.14	-49.4%		213,748	1.3%	-\$0.14	-49.4%		110,267	0.7%
Youth, Monthly Pass/Cap	-\$0.07	-21.1%	3,197,709	7.1%	-\$0.07	-21.1%		1,168,113	7.1%	-\$0.07	-21.1%		818,737	5.2%
Senior/Disabled, 3-Hour Pass	-\$0.07	-10.0%	1,351,845	3.0%	-\$0.07	-10.0%		543,265	3.3%	-\$0.07	-10.0%		713,896	4.5%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	-\$0.37	-50.9%	348,960	0.8%	-\$0.37	-50.9%		140,236	0.8%	-\$0.37	-50.9%		184,282	1.2%
Senior/Disabled, 10-Ride	-\$0.03	-3.6%	490,707	1.1%	-\$0.03	-3.6%		150,987	0.9%	-\$0.03	-3.6%		234,686	1.5%
Senior/Disabled, Day Pass	-\$0.04	-10.0%	2,708,894	6.0%	-\$0.04	-10.0%		923,487	5.6%	-\$0.04	-10.0%		1,354,447	8.5%
Senior/Disabled, Electronic Day Pass / Fare Capping	-\$0.22	-51.8%	465,681	1.0%	-\$0.22	-51.8%		158,755	1.0%	-\$0.22	-51.8%		232,840	1.5%
Senior/Disabled, Monthly Pass/Cap	-\$0.30	-52.6%	3,558,068	7.9%	-\$0.30	-52.6%		1,167,491	7.1%	-\$0.30	-52.6%		2,306,155	14.5%
Bulk Purchase	-\$0.25	-24.6%	2,699,103	6.0%	-\$0.25	-24.6%		988,050	6.0%	-\$0.25	-24.6%		992,518	6.3%
EcoPass (Business)	-\$0.17	-8.3%	1,593,977	3.6%	-\$0.17	-8.3%		310,278	1.9%	-\$0.17	-8.3%		76,511	0.5%
EcoPass (NECO)	\$0.33	23.2%	128,295	0.3%	\$0.33	23.2%		19,738	0.1%	\$0.33	23.2%		42,765	0.3%
CollegePass	-\$0.19	-8.3%	535,105	1.2%	-\$0.19	-8.3%		213,206	1.3%	-\$0.19	-8.3%		267,553	1.7%
Semester Pass	-\$0.48	-38.2%	37,702	0.1%	-\$0.48	-38.2%		15,022	0.1%	-\$0.48	-38.2%		18,851	0.1%
Total, Local	-\$0.17	-17.0%	36,989,263	82.5%	-\$0.16	-16.0%	1.0%	14,481,868	87.6%	-\$0.16	-17.6%	-0.6%	14,627,990	92.1%

Table A-2: Average Fare Analysis – Regional (Current)

Current Fare Structure													
	All Customers				Minority Customers					Low-Income Customers			
Fare Payment Type	Avg Fare per Boarding	Boardings	% of All Customer Boardings	% of Boardings in Service Category	Avg Fare per Boarding	Minority Boardings	% of All Minority Boardings	% of Minority Boardings in Service Category		Avg Fare per Boarding	Low-Income Boardings	% of All Low-Income Boardings	% of Low-Income Boardings in Service Category
Full Fare, 3-Hour Pass	\$3.38	134,798	0.3%	2.9%	\$3.38	53,919	0.3%	4.1%		\$3.38	82,376	0.5%	10.2%
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$3.38	144,181	0.3%	3.1%	\$3.38	32,645	0.2%	2.5%		\$3.38	13,350	0.1%	1.7%
Full Fare, 10-Ride	\$3.30	85,853	0.2%	1.8%	\$3.30	19,812	0.1%	1.5%		\$3.30	3,679	0.0%	0.5%
Full Fare, Day Pass	\$2.32	474,263	1.1%	10.2%	\$2.32	140,997	0.9%	10.8%		\$2.32	67,752	0.4%	8.4%
Full Fare, Electronic Day Pass / Fare Capping	\$2.32	1,186,035	2.6%	25.5%	\$2.32	275,822	1.7%	21.1%		\$2.32	56,478	0.4%	7.0%
Full Fare, Monthly Pass/Cap	\$3.29	524,218	1.2%	11.3%	\$3.29	150,953	0.9%	11.5%		\$3.29	45,584	0.3%	5.7%
LiVE, Electronic 3-Hour Pass / Fare Capping	\$1.86	6,418	0.0%	0.1%	\$1.86	3,126	0.0%	0.2%		\$1.86	5,539	0.0%	0.7%
LiVE, 10-Ride	\$1.93	362	0.0%	0.0%	\$1.93	176	0.0%	0.0%		\$1.93	312	0.0%	0.0%
LiVE, Electronic Day Pass / Fare Capping	\$1.30	17,750	0.0%	0.4%	\$1.30	8,646	0.1%	0.7%		\$1.30	15,319	0.1%	1.9%
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	\$2.85	716	0.0%	0.0%	\$2.85	169	0.0%	0.0%		\$2.85	-	0.0%	0.0%
Full Fare -> Expanded Live, 10-Ride	\$3.16	20	0.0%	0.0%	\$3.16	5	0.0%	0.0%		\$3.16	-	0.0%	0.0%
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Capping	\$2.18	1,554	0.0%	0.0%	\$2.18	366	0.0%	0.0%		\$2.18	-	0.0%	0.0%
Full Fare -> Expanded LiVE, Monthly Pass/Cap	\$3.48	1,042	0.0%	0.0%	\$3.48	245	0.0%	0.0%		\$3.48	-	0.0%	0.0%
Youth, 3-Hour Pass	\$1.05	16,482	0.0%	0.4%	\$1.05	7,547	0.0%	0.6%		\$1.05	7,745	0.0%	1.0%
Youth, 10-Ride	\$0.98	10,409	0.0%	0.2%	\$0.98	4,448	0.0%	0.3%		\$0.98	3,739	0.0%	0.5%
Youth, Day Pass	\$0.63	131,116	0.3%	2.8%	\$0.63	72,842	0.4%	5.6%		\$0.63	62,196	0.4%	7.7%
Youth, Electronic Day Pass / Fare Capping	\$0.63	136,895	0.3%	2.9%	\$0.63	63,884	0.4%	4.9%		\$0.63	32,956	0.2%	4.1%
Youth, Monthly Pass/Cap	\$1.03	80,890	0.2%	1.7%	\$1.03	29,549	0.2%	2.3%		\$1.03	20,711	0.1%	2.6%
Senior/Disabled, 3-Hour Pass	\$1.71	28,452	0.1%	0.6%	\$1.71	1,423	0.0%	0.1%		\$1.71	3,347	0.0%	0.4%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$1.71	21,792	0.0%	0.5%	\$1.71	1,090	0.0%	0.1%		\$1.71	2,564	0.0%	0.3%
Senior/Disabled, 10-Ride	\$1.55	22,801	0.1%	0.5%	\$1.55	5,472	0.0%	0.4%		\$1.55	3,109	0.0%	0.4%
Senior/Disabled, Day Pass	\$1.03	375,666	0.8%	8.1%	\$1.03	125,222	0.8%	9.6%		\$1.03	140,875	0.9%	17.5%
Senior/Disabled, Electronic Day Pass / Fare Capping	\$1.03	197,951	0.4%	4.3%	\$1.03	65,984	0.4%	5.0%		\$1.03	74,232	0.5%	9.2%
Senior/Disabled, Monthly Pass/Cap	\$1.69	292,832	0.7%	6.3%	\$1.69	56,074	0.3%	4.3%		\$1.69	77,061	0.5%	9.6%
Bulk Purchase	\$2.28	140,307	0.3%	3.0%	\$2.28	35,109	0.2%	2.7%		\$2.28	15,879	0.1%	2.0%
EcoPass (Business)	\$4.79	422,317	0.9%	9.1%	\$4.79	95,547	0.6%	7.3%		\$4.79	17,258	0.1%	2.1%
EcoPass (NECO)	\$3.80	37,009	0.1%	0.8%	\$3.80	5,483	0.0%	0.4%		\$3.80	3,965	0.0%	0.5%
CollegePass	\$4.51	141,493	0.3%	3.0%	\$4.51	47,802	0.3%	3.7%		\$4.51	46,460	0.3%	5.8%
Semester Pass	n/a	-	0.0%	0.0%	n/a	-	0.0%	0.0%		n/a	-	0.0%	0.0%
Total, Regional	\$2.47	4,653,852	10.4%	100.0%	\$2.33	1,308,289	7.9%	100.0%		\$2.00	805,956	5.1%	100.0%

\*Assumes average fare of eligible population

Table A-2: Average Fare Analysis – Regional (Proposed)

Proposed Fare Structure									
	All Customers			Minority Customers			Low-Income Customers		
Fare Payment Type	Avg Fare per Boarding	Boardings		Avg Fare per Boarding	Minority Boardings		Avg Fare per Boarding	Low-Income Boardings	
Full Fare, 3-Hour Pass	\$1.77	134,798		\$1.77	53,919		\$1.77	82,376	
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$1.54	144,181		\$1.54	32,645		\$1.54	13,350	
Full Fare, 10-Ride	\$1.80	85,853		\$1.80	19,812		\$1.80	3,679	
Full Fare, Day Pass	\$1.21	474,263		\$1.21	140,997		\$1.21	67,752	
Full Fare, Electronic Day Pass / Fare Capping	\$1.10	1,186,035		\$1.10	275,822		\$1.10	56,478	
Full Fare, Monthly Pass/Cap	\$1.45	524,218		\$1.45	150,953		\$1.45	45,584	
LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.48	6,418		\$0.48	3,126		\$0.48	5,539	
LiVE, 10-Ride	\$0.83	362		\$0.83	176		\$0.83	312	
LiVE, Electronic Day Pass / Fare Capping	\$0.34	17,750		\$0.34	8,646		\$0.34	15,319	
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	\$0.44	716		\$0.44	169		\$0.44	-	
Full Fare -> Expanded Live, 10-Ride	\$0.84	20		\$0.84	5		\$0.84	-	
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Capping	\$0.34	1,554		\$0.34	366		\$0.34	-	
Full Fare -> Expanded LiVE, Monthly Pass/Cap	\$0.46	1,042		\$0.46	245		\$0.46	-	
Youth, 3-Hour Pass	\$0.56	16,482		\$0.56	7,547		\$0.56	7,745	
Youth, Electronic 3-Hour Pass / Fare Capping	\$0.33	20,230		\$0.33	3,934		\$0.33	3,468	
Youth, 10-Ride	\$0.52	10,409		\$0.52	4,448		\$0.52	3,739	
Youth, Day Pass	\$0.33	131,116		\$0.33	72,842		\$0.33	62,196	
Youth, Electronic Day Pass / Fare Capping	\$0.20	136,895		\$0.20	63,884		\$0.20	32,956	
Youth, Monthly Pass/Cap	\$0.46	80,890		\$0.46	29,549		\$0.46	20,711	
Senior/Disabled, 3-Hour Pass	\$0.89	28,452		\$0.89	1,423		\$0.89	3,347	
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.52	21,792		\$0.52	1,090		\$0.52	2,564	
Senior/Disabled, 10-Ride	\$0.83	22,801		\$0.83	5,472		\$0.83	3,109	
Senior/Disabled, Day Pass	\$0.53	375,666		\$0.53	125,222		\$0.53	140,875	
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.33	197,951		\$0.33	65,984		\$0.33	74,232	
Senior/Disabled, Monthly Pass/Cap	\$0.46	292,832		\$0.46	56,074		\$0.46	77,061	
Bulk Purchase	\$0.92	140,307		\$0.92	35,109		\$0.92	15,879	
EcoPass (Business)	\$2.39	422,317		\$2.39	95,547		\$2.39	17,258	
EcoPass (NECO)	\$2.04	37,009		\$2.04	5,483		\$2.04	3,965	
CollegePass	\$2.22	141,493		\$2.22	47,802		\$2.22	46,460	
Semester Pass	n/a	-		n/a	-		n/a	-	
Total, Regional	\$1.15	4,653,852		\$1.10	1,308,289		\$0.92	805,956	

Table A-2: Average Fare Analysis – Regional (Change in Average Fare per Boarding)

Change in Average Fare Per Boarding														
	All Customers				Minority Customers					Low-Income Customers				
Fare Payment Type	Change in Avg Fare per Boarding	% Change	Boardings	% of All Customer Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Minority Boardings	% of All Minority Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Low-Income Boardings	% of All Low-Income Boardings
Full Fare, 3-Hour Pass	-\$1.61	-47.6%	134,798	0.3%	-\$1.61	-47.6%	0.2%	53,919	0.3%	-\$1.61	-47.6%	-0.6%	82,376	0.5%
Full Fare, Electronic 3-Hour Pass / Fare Capping	-\$1.84	-54.4%	144,181	0.3%	-\$1.84	-54.4%		32,645	0.2%	-\$1.84	-54.4%		13,350	0.1%
Full Fare, 10-Ride	-\$1.50	-45.5%	85,853	0.2%	-\$1.50	-45.5%		19,812	0.1%	-\$1.50	-45.5%		3,679	0.0%
Full Fare, Day Pass	-\$1.10	-47.6%	474,263	1.1%	-\$1.10	-47.6%		140,997	0.9%	-\$1.10	-47.6%		67,752	0.4%
Full Fare, Electronic Day Pass / Fare Capping	-\$1.22	-52.7%	1,186,035	2.6%	-\$1.22	-52.7%		275,822	1.7%	-\$1.22	-52.7%		56,478	0.4%
Full Fare, Monthly Pass/Cap	-\$1.84	-56.0%	524,218	1.2%	-\$1.84	-56.0%		150,953	0.9%	-\$1.84	-56.0%		45,584	0.3%
LiVE, Electronic 3-Hour Pass / Fare Capping	-\$1.38	-74.2%	6,418	0.0%	-\$1.38	-74.2%		3,126	0.0%	-\$1.38	-74.2%		5,539	0.0%
LiVE, 10-Ride	-\$1.10	-57.1%	362	0.0%	-\$1.10	-57.1%		176	0.0%	-\$1.10	-57.1%		312	0.0%
LiVE, Electronic Day Pass / Fare Capping	-\$0.96	-73.7%	17,750	0.0%	-\$0.96	-73.7%		8,646	0.1%	-\$0.96	-73.7%		15,319	0.1%
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	-\$2.41	-84.5%	716	0.0%	-\$2.41	-84.5%		169	0.0%	n/a	n/a		-	0.0%
Full Fare -> Expanded Live, 10-Ride	-\$2.32	-73.3%	20	0.0%	-\$2.32	-73.3%		5	0.0%	n/a	n/a		-	0.0%
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Capping	-\$1.84	-84.2%	1,554	0.0%	-\$1.84	-84.2%		366	0.0%	n/a	n/a		-	0.0%
Full Fare -> Expanded LiVE, Monthly Pass/Cap	-\$3.01	-86.6%	1,042	0.0%	-\$3.01	-86.6%		245	0.0%	n/a	n/a		-	0.0%
Youth, 3-Hour Pass	-\$0.49	-46.9%	16,482	0.0%	-\$0.49	-46.9%		7,547	0.0%	-\$0.49	-46.9%		7,745	0.0%
Youth, Electronic 3-Hour Pass / Fare Capping	-\$0.72	-68.5%	20,230	0.0%	-\$0.72	-68.5%		3,934	0.0%	-\$0.72	-68.5%		3,468	0.0%
Youth, 10-Ride	-\$0.46	-46.9%	10,409	0.0%	-\$0.46	-46.9%		4,448	0.0%	-\$0.46	-46.9%		3,739	0.0%
Youth, Day Pass	-\$0.29	-46.9%	131,116	0.3%	-\$0.29	-46.9%		72,842	0.4%	-\$0.29	-46.9%		62,196	0.4%
Youth, Electronic Day Pass / Fare Capping	-\$0.42	-67.4%	136,895	0.3%	-\$0.42	-67.4%		63,884	0.4%	-\$0.42	-67.4%		32,956	0.2%
Youth, Monthly Pass/Cap	-\$0.56	-55.0%	80,890	0.2%	-\$0.56	-55.0%		29,549	0.2%	-\$0.56	-55.0%		20,711	0.1%
Senior/Disabled, 3-Hour Pass	-\$0.82	-48.1%	28,452	0.1%	-\$0.82	-48.1%		1,423	0.0%	-\$0.82	-48.1%		3,347	0.0%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	-\$1.20	-69.9%	21,792	0.0%	-\$1.20	-69.9%		1,090	0.0%	-\$1.20	-69.9%		2,564	0.0%
Senior/Disabled, 10-Ride	-\$0.72	-46.5%	22,801	0.1%	-\$0.72	-46.5%		5,472	0.0%	-\$0.72	-46.5%		3,109	0.0%
Senior/Disabled, Day Pass	-\$0.50	-48.6%	375,666	0.8%	-\$0.50	-48.6%		125,222	0.8%	-\$0.50	-48.6%		140,875	0.9%
Senior/Disabled, Electronic Day Pass / Fare Capping	-\$0.71	-68.4%	197,951	0.4%	-\$0.71	-68.4%		65,984	0.4%	-\$0.71	-68.4%		74,232	0.5%
Senior/Disabled, Monthly Pass/Cap	-\$1.23	-72.7%	292,832	0.7%	-\$1.23	-72.7%		56,074	0.3%	-\$1.23	-72.7%		77,061	0.5%
Bulk Purchase	-\$1.36	-59.5%	140,307	0.3%	-\$1.36	-59.5%		35,109	0.2%	-\$1.36	-59.5%		15,879	0.1%
EcoPass (Business)	-\$2.41	-50.2%	422,317	0.9%	-\$2.41	-50.2%		95,547	0.6%	-\$2.41	-50.2%		17,258	0.1%
EcoPass (NECO)	-\$1.76	-46.3%	37,009	0.1%	-\$1.76	-46.3%		5,483	0.0%	-\$1.76	-46.3%		3,965	0.0%
CollegePass	-\$2.29	-50.8%	141,493	0.3%	-\$2.29	-50.8%		47,802	0.3%	-\$2.29	-50.8%		46,460	0.3%
Semester Pass	n/a	n/a	n/a	0.0%	n/a	n/a		-	0.0%	n/a	n/a		-	0.0%
Total, Regional	-\$1.31	-53.2%	4,653,852	10.4%	-\$1.24	-53.0%	0.2%	1,308,289	7.9%	-\$1.08	-53.8%	-0.6%	805,956	5.1%

Table A-3: Average Fare Analysis – Airport (Current)

Current Fare Structure														
	All Customers				Minority Customers					Low-Income Customers				
Fare Payment Type	Avg Fare per Boarding	Boardings	% of All Customer Boardings	% of Boardings in Service Category	Avg Fare per Boarding	Minority Boardings	% of All Minority Boardings	% of Minority Customers in Service Category		Avg Fare per Boarding	Low-Income Boardings	% of All Low-Income Boardings	% of Low-Income Customers in Service Category	
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$9.19	15,470	0.0%	0.5%	\$9.19	645	0.0%	0.1%		\$9.19	1,406	0.0%	0.3%	
Full Fare, Day Pass	\$4.72	1,704,309	3.8%	53.1%	\$4.72	390,571	2.4%	53.2%		\$4.72	227,241	1.4%	51.3%	
Full Fare, Electronic Day Pass / Fare Capping	\$4.72	513,724	1.1%	16.0%	\$4.72	54,651	0.3%	7.4%		\$4.72	68,496	0.4%	15.5%	
LiVE, Electronic 3-Hour Pass / Fare Capping	\$4.70	1,515	0.0%	0.0%	\$4.70	738	0.0%	0.1%		\$4.70	1,307	0.0%	0.3%	
LiVE, Electronic Day Pass / Fare Capping	\$2.04	3,510	0.0%	0.1%	\$2.04	1,710	0.0%	0.2%		\$2.04	3,029	0.0%	0.7%	
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	\$7.90	36	0.0%	0.0%	\$7.90	4	0.0%	0.0%		\$7.90	-	0.0%	0.0%	
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Cappi	\$3.40	118	0.0%	0.0%	\$3.40	12	0.0%	0.0%		\$3.40	-	0.0%	0.0%	
Youth, Electronic 3-Hour Pass / Fare Capping	\$2.72	947	0.0%	0.0%	\$2.72	184	0.0%	0.0%		\$2.72	162	0.0%	0.0%	
Youth, Day Pass	\$0.81	48,306	0.1%	1.5%	\$0.81	26,837	0.2%	3.7%		\$0.81	22,914	0.1%	5.2%	
Youth, Electronic Day Pass / Fare Capping	\$0.81	41,744	0.1%	1.3%	\$0.81	19,480	0.1%	2.7%		\$0.81	10,049	0.1%	2.3%	
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$4.81	5,351	0.0%	0.2%	\$4.81	554	0.0%	0.1%		\$4.81	203	0.0%	0.0%	
Senior/Disabled, Day Pass	\$1.34	134,179	0.3%	4.2%	\$1.34	13,881	0.1%	1.9%		\$1.34	5,095	0.0%	1.1%	
Senior/Disabled, Electronic Day Pass / Fare Capping	\$1.34	60,362	0.1%	1.9%	\$1.34	6,244	0.0%	0.9%		\$1.34	2,292	0.0%	0.5%	
Bulk Purchase	n/a	-	0.0%	0.0%	n/a	-	0.0%	0.0%		n/a	-	0.0%	0.0%	
EcoPass (Business)	\$5.57	634,381	1.4%	19.7%	\$5.57	211,460	1.3%	28.8%		\$5.57	92,514	0.6%	20.9%	
EcoPass (NECO)	\$8.99	10,202	0.0%	0.3%	\$8.99	600	0.0%	0.1%		\$8.99	850	0.0%	0.2%	
CollegePass	\$9.91	38,064	0.1%	1.2%	\$9.91	6,344	0.0%	0.9%		\$9.91	7,613	0.0%	1.7%	
Semester Pass	n/a	-	0.0%	0.0%	n/a	-	0.0%	0.0%		n/a	-	0.0%	0.0%	
Total, Airport	\$4.67	3,212,217	7.2%	100.0%	\$4.67	733,914	4.4%	100.0%		\$4.64	443,174	2.8%	100.0%	

\*Assumes average fare of eligible population

Table A-3: Average Fare Analysis – Airport (Proposed)

Proposed Fare Structure									
	All Customers			Minority Customers			Low-Income Customers		
Fare Payment Type	Avg Fare per Boarding	Boardings		Avg Fare per Boarding	Minority Boardings		Avg Fare per Boarding	Low-Income Boardings	
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$8.47	15,470		\$8.47	645		\$8.47	1,406	
Full Fare, Day Pass	\$4.50	1,704,309		\$4.50	390,571		\$4.50	227,241	
Full Fare, Electronic Day Pass / Fare Capping	\$2.98	513,724		\$2.98	54,651		\$2.98	68,496	
LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.91	1,515		\$0.91	738		\$0.91	1,307	
LiVE, Electronic Day Pass / Fare Capping	\$0.57	3,510		\$0.57	1,710		\$0.57	3,029	
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	\$0.92	36		\$0.92	4		\$0.92	-	
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Cappi	\$0.57	118		\$0.57	12		\$0.57	-	
Youth, Electronic 3-Hour Pass / Fare Capping	\$0.68	947		\$0.68	184		\$0.68	162	
Youth, Day Pass	\$0.43	48,306		\$0.43	26,837		\$0.43	22,914	
Youth, Electronic Day Pass / Fare Capping	\$0.28	41,744		\$0.28	19,480		\$0.28	10,049	
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$1.14	5,351		\$1.14	554		\$1.14	203	
Senior/Disabled, Day Pass	\$0.69	134,179		\$0.69	13,881		\$0.69	5,095	
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.45	60,362		\$0.45	6,244		\$0.45	2,292	
Bulk Purchase	n/a	-		n/a	-		n/a	-	
EcoPass (Business)	\$2.59	634,381		\$2.59	211,460		\$2.59	92,514	
EcoPass (NECO)	\$2.50	10,202		\$2.50	600		\$2.50	850	
CollegePass	\$2.44	38,064		\$2.44	6,344		\$2.44	7,613	
Semester Pass	n/a	-		n/a	-		n/a	-	
Total, Airport	\$3.50	3,212,217		\$3.43	733,914		\$3.43	443,174	



Table A-3: Average Fare Analysis – Airport (Change in Average Fare per Boarding)

Change in Average Fare Per Boarding														
	All Customers				Minority Customers					Low-Income Customers				
Fare Payment Type	Change in Avg Fare per Boarding	% Change	Boardings	% of All Customer Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Minority Boardings	% of All Minority Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Low-Income Boardings	% of All Low-Income Boardings
Full Fare, Electronic 3-Hour Pass / Fare Capping	-\$0.72	-7.9%	15,470	0.0%	-\$0.72	-7.9%		645	0.0%	-\$0.72	-7.9%		1,406	0.0%
Full Fare, Day Pass	-\$0.22	-4.8%	1,704,309	3.8%	-\$0.22	-4.8%		390,571	2.4%	-\$0.22	-4.8%		227,241	1.4%
Full Fare, Electronic Day Pass / Fare Capping	-\$1.74	-36.8%	513,724	1.1%	-\$1.74	-36.8%		54,651	0.3%	-\$1.74	-36.8%		68,496	0.4%
LiVE, Electronic 3-Hour Pass / Fare Capping	-\$3.78	-80.6%	1,515	0.0%	-\$3.78	-80.6%		738	0.0%	-\$3.78	-80.6%		1,307	0.0%
LiVE, Electronic Day Pass / Fare Capping	-\$1.47	-72.2%	3,510	0.0%	-\$1.47	-72.2%		1,710	0.0%	-\$1.47	-72.2%		3,029	0.0%
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	-\$6.98	-88.4%	36	0.0%	-\$6.98	-88.4%		4	0.0%	n/a	n/a		-	0.0%
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Cappi	-\$2.83	-83.3%	118	0.0%	-\$2.83	-83.3%		12	0.0%	n/a	n/a		-	0.0%
Youth, Electronic 3-Hour Pass / Fare Capping	-\$2.04	-75.0%	947	0.0%	-\$2.04	-75.0%		184	0.0%	-\$2.04	-75.0%		162	0.0%
Youth, Day Pass	-\$0.38	-46.9%	48,306	0.1%	-\$0.38	-46.9%		26,837	0.2%	-\$0.38	-46.9%		22,914	0.1%
Youth, Electronic Day Pass / Fare Capping	-\$0.53	-65.6%	41,744	0.1%	-\$0.53	-65.6%		19,480	0.1%	-\$0.53	-65.6%		10,049	0.1%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	-\$3.67	-76.3%	5,351	0.0%	-\$3.67	-76.3%		554	0.0%	-\$3.67	-76.3%		203	0.0%
Senior/Disabled, Day Pass	-\$0.65	-48.6%	134,179	0.3%	-\$0.65	-48.6%		13,881	0.1%	-\$0.65	-48.6%		5,095	0.0%
Senior/Disabled, Electronic Day Pass / Fare Capping	-\$0.89	-66.7%	60,362	0.1%	-\$0.89	-66.7%		6,244	0.0%	-\$0.89	-66.7%		2,292	0.0%
Bulk Purchase	n/a	n/a	n/a	0.0%	n/a	n/a		-	0.0%	n/a	n/a		-	0.0%
EcoPass (Business)	-\$2.97	-53.4%	634,381	1.4%	-\$2.97	-53.4%		211,460	1.3%	-\$2.97	-53.4%		92,514	0.6%
EcoPass (NECO)	-\$6.49	-72.2%	10,202	0.0%	-\$6.49	-72.2%		600	0.0%	-\$6.49	-72.2%		850	0.0%
CollegePass	-\$7.47	-75.4%	38,064	0.1%	-\$7.47	-75.4%		6,344	0.0%	-\$7.47	-75.4%		7,613	0.0%
Semester Pass	n/a	n/a	n/a	0.0%	n/a	n/a		-	0.0%	n/a	n/a		-	0.0%
Total, Airport	-\$1.16	-24.9%	3,212,217	7.2%	-\$1.24	-26.4%	-1.5%	733,914	4.4%	-\$1.22	-26.2%	-1.2%	443,174	2.8%

Table A-4: Average Fare Analysis – Total (Current)

Current Fare Structure												
	All Customers				Minority Customers				Low-Income Customers			
Fare Payment Type	Avg Fare per Boarding	Boardings	% of All Customer Boardings		Avg Fare per Boarding	Minority Boardings	% of All Minority Boardings		Avg Fare per Boarding	Low-Income Boardings	% of All Low-Income Boardings	
Full Fare, 3-Hour Pass	\$1.61	4,064,234	9.1%		\$1.60	1,853,187	11.2%		\$1.62	1,928,997	12.1%	
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$1.74	2,004,981	4.5%		\$1.71	392,103	2.4%		\$1.65	331,099	2.1%	
Full Fare, 10-Ride	\$1.70	1,043,144	2.3%		\$1.63	428,836	2.6%		\$1.57	347,560	2.2%	
Full Fare, Day Pass	\$2.14	6,668,035	14.9%		\$1.66	3,025,714	18.3%		\$1.51	2,424,610	15.3%	
Full Fare, Electronic Day Pass / Fare Capping	\$2.07	3,486,202	7.8%		\$1.59	1,164,147	7.0%		\$1.71	555,044	3.5%	
Full Fare, Monthly Pass/Cap	\$1.53	3,868,881	8.6%		\$1.47	1,372,748	8.3%		\$1.35	901,947	5.7%	
LiVE, Electronic 3-Hour Pass / Fare Capping	\$1.01	124,683	0.3%		\$1.01	60,735	0.4%		\$1.01	107,603	0.7%	
LiVE, 10-Ride	\$1.07	4,104	0.0%		\$1.07	1,999	0.0%		\$1.07	3,541	0.0%	
LiVE, Electronic Day Pass / Fare Capping	\$0.62	190,086	0.4%		\$0.62	92,593	0.6%		\$0.62	164,046	1.0%	
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	\$1.60	15,544	0.0%		\$1.55	8,036	0.0%		n/a	-	0.0%	
Full Fare -> Expanded Live, 10-Ride	\$1.60	518	0.0%		\$1.57	270	0.0%		n/a	-	0.0%	
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Cappi	\$0.97	23,102	0.1%		\$0.91	11,771	0.1%		n/a	-	0.0%	
Full Fare -> Expanded LiVE, Monthly Pass/Cap	\$1.38	17,291	0.0%		\$1.30	8,884	0.1%		n/a	-	0.0%	
Youth, 3-Hour Pass	\$0.44	1,157,628	2.6%		\$0.44	530,072	3.2%		\$0.44	544,022	3.4%	
Youth, Electronic 3-Hour Pass / Fare Capping	\$0.46	519,059	1.2%		\$0.46	100,928	0.6%		\$0.46	88,982	0.6%	
Youth, 10-Ride	\$0.51	293,738	0.7%		\$0.51	125,506	0.8%		\$0.51	105,517	0.7%	
Youth, Day Pass	\$0.35	977,338	2.2%		\$0.35	542,966	3.3%		\$0.35	463,609	2.9%	
Youth, Electronic Day Pass / Fare Capping	\$0.39	636,671	1.4%		\$0.39	297,113	1.8%		\$0.39	153,273	1.0%	
Youth, Monthly Pass/Cap	\$0.35	3,278,599	7.3%		\$0.35	1,197,662	7.2%		\$0.35	839,448	5.3%	
Senior/Disabled, 3-Hour Pass	\$0.74	1,380,298	3.1%		\$0.72	544,688	3.3%		\$0.72	717,243	4.5%	
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.84	376,103	0.8%		\$0.74	141,879	0.9%		\$0.74	187,049	1.2%	
Senior/Disabled, 10-Ride	\$0.80	513,507	1.1%		\$0.79	156,459	0.9%		\$0.77	237,795	1.5%	
Senior/Disabled, Day Pass	\$0.54	3,218,739	7.2%		\$0.52	1,062,589	6.4%		\$0.49	1,500,417	9.5%	
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.67	723,994	1.6%		\$0.63	230,983	1.4%		\$0.58	309,364	1.9%	
Senior/Disabled, Monthly Pass/Cap	\$0.65	3,850,899	8.6%		\$0.61	1,223,565	7.4%		\$0.60	2,383,216	15.0%	
Bulk Purchase	\$1.10	2,839,410	6.3%		\$1.08	1,023,160	6.2%		\$1.05	1,008,397	6.4%	
EcoPass (Business)	\$3.34	2,650,675	5.9%		\$3.69	617,285	3.7%		\$4.06	186,283	1.2%	
EcoPass (NECO)	\$2.36	175,506	0.4%		\$2.10	25,821	0.2%		\$1.75	47,580	0.3%	
CollegePass	\$3.10	714,662	1.6%		\$2.83	267,352	1.6%		\$2.75	321,626	2.0%	
Semester Pass	\$1.25	37,702	0.1%		\$1.25	15,022	0.1%		\$1.25	18,851	0.1%	
Total, Total	\$1.41	44,855,331	100.0%		\$1.26	16,524,071	100.0%		\$1.08	15,877,120	100.0%	

\*Assumes average fare of eligible population

Table A-4: Average Fare Analysis – Total (Proposed)

Proposed Fare Structure								
Fare Payment Type	All Customers			Minority Customers			Low-Income Customers	
	Avg Fare per Boarding	Boardings		Avg Fare per Boarding	Minority Boardings		Avg Fare per Boarding	Low-Income Boardings
Full Fare, 3-Hour Pass	\$1.43	4,064,234		\$1.43	1,853,187		\$1.43	1,928,997
Full Fare, Electronic 3-Hour Pass / Fare Capping	\$1.23	2,004,981		\$1.19	392,103		\$1.19	331,099
Full Fare, 10-Ride	\$1.55	1,043,144		\$1.54	428,836		\$1.53	347,560
Full Fare, Day Pass	\$1.94	6,668,035		\$1.50	3,025,714		\$1.38	2,424,610
Full Fare, Electronic Day Pass / Fare Capping	\$1.27	3,486,202		\$1.04	1,164,147		\$1.18	555,044
Full Fare, Monthly Pass/Cap	\$1.03	3,868,881		\$1.02	1,372,748		\$0.99	901,947
LiVE, Electronic 3-Hour Pass / Fare Capping	\$0.40	124,683		\$0.40	60,735		\$0.40	107,603
LiVE, 10-Ride	\$0.75	4,104		\$0.75	1,999		\$0.75	3,541
LiVE, Electronic Day Pass / Fare Capping	\$0.23	190,086		\$0.23	92,593		\$0.23	164,046
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	\$0.39	15,544		\$0.39	8,036		n/a	-
Full Fare -> Expanded Live, 10-Ride	\$0.75	518		\$0.74	270		n/a	-
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Cappi	\$0.22	23,102		\$0.21	11,771		n/a	-
Full Fare -> Expanded LiVE, Monthly Pass/Cap	\$0.30	17,291		\$0.30	8,884		n/a	-
Youth, 3-Hour Pass	\$0.41	1,157,628		\$0.41	530,072		\$0.41	544,022
Youth, Electronic 3-Hour Pass / Fare Capping	\$0.23	519,059		\$0.23	100,928		\$0.23	88,982
Youth, 10-Ride	\$0.47	293,738		\$0.47	125,506		\$0.47	105,517
Youth, Day Pass	\$0.28	977,338		\$0.28	542,966		\$0.28	463,609
Youth, Electronic Day Pass / Fare Capping	\$0.16	636,671		\$0.16	297,113		\$0.16	153,273
Youth, Monthly Pass/Cap	\$0.27	3,278,599		\$0.27	1,197,662		\$0.27	839,448
Senior/Disabled, 3-Hour Pass	\$0.65	1,380,298		\$0.65	544,688		\$0.65	717,243
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	\$0.37	376,103		\$0.36	141,879		\$0.36	187,049
Senior/Disabled, 10-Ride	\$0.74	513,507		\$0.74	156,459		\$0.74	237,795
Senior/Disabled, Day Pass	\$0.42	3,218,739		\$0.41	1,062,589		\$0.40	1,500,417
Senior/Disabled, Electronic Day Pass / Fare Capping	\$0.26	723,994		\$0.25	230,983		\$0.24	309,364
Senior/Disabled, Monthly Pass/Cap	\$0.28	3,850,899		\$0.28	1,223,565		\$0.27	2,383,216
Bulk Purchase	\$0.79	2,839,410		\$0.78	1,023,160		\$0.78	1,008,397
EcoPass (Business)	\$2.14	2,650,675		\$2.21	617,285		\$2.29	186,283
EcoPass (NECO)	\$1.85	175,506		\$1.82	25,821		\$1.78	47,580
CollegePass	\$2.11	714,662		\$2.09	267,352		\$2.08	321,626
Semester Pass	\$0.77	37,702		\$0.77	15,022		\$0.77	18,851
Total, Total	\$1.05	44,855,331		\$0.97	16,524,071		\$0.84	15,877,120

Table A-4: Average Fare Analysis – Total (Change in Average Fare per Boarding)

Change in Average Fare Per Boarding														
	All Customers				Minority Customers					Low-Income Customers				
Fare Payment Type	Change in Avg Fare per Boarding	% Change	Boardings	% of All Customer Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Minority Boardings	% of All Minority Boardings	Change in Avg Fare per Boarding	% Change	Difference in % Change from All Customers	Low-Income Boardings	% of All Low-Income Boardings
Full Fare, 3-Hour Pass	-\$0.18	-11.1%	4,064,234	9.1%	-\$0.17	-10.8%	0.3%	1,853,187	11.2%	-\$0.19	-11.8%	-0.8%	1,928,997	12.1%
Full Fare, Electronic 3-Hour Pass / Fare Capping	-\$0.51	-29.4%	2,004,981	4.5%	-\$0.53	-30.7%	-1.3%	392,103	2.4%	-\$0.46	-28.1%	1.3%	331,099	2.1%
Full Fare, 10-Ride	-\$0.15	-8.8%	1,043,144	2.3%	-\$0.10	-5.9%	2.9%	428,836	2.6%	-\$0.04	-2.8%	6.0%	347,560	2.2%
Full Fare, Day Pass	-\$0.20	-9.3%	6,668,035	14.9%	-\$0.16	-9.6%	-0.2%	3,025,714	18.3%	-\$0.14	-9.0%	0.4%	2,424,610	15.3%
Full Fare, Electronic Day Pass / Fare Capping	-\$0.80	-38.5%	3,486,202	7.8%	-\$0.55	-34.4%	4.1%	1,164,147	7.0%	-\$0.53	-31.0%	7.5%	555,044	3.5%
Full Fare, Monthly Pass/Cap	-\$0.50	-32.5%	3,868,881	8.6%	-\$0.46	-31.0%	1.5%	1,372,748	8.3%	-\$0.36	-26.9%	5.6%	901,947	5.7%
LiVE, Electronic 3-Hour Pass / Fare Capping	-\$0.61	-60.4%	124,683	0.3%	-\$0.61	-60.4%	0.0%	60,735	0.4%	-\$0.61	-60.4%	0.0%	107,603	0.7%
LiVE, 10-Ride	-\$0.32	-30.1%	4,104	0.0%	-\$0.32	-30.1%	0.0%	1,999	0.0%	-\$0.32	-30.1%	0.0%	3,541	0.0%
LiVE, Electronic Day Pass / Fare Capping	-\$0.39	-63.3%	190,086	0.4%	-\$0.39	-63.3%	0.0%	92,593	0.6%	-\$0.39	-63.3%	0.0%	164,046	1.0%
Full Fare -> Expanded LiVE, Electronic 3-Hour Pass / Fare Ca	-\$1.20	-75.5%	15,544	0.0%	-\$1.16	-75.0%	0.6%	8,036	0.0%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded Live, 10-Ride	-\$0.86	-53.4%	518	0.0%	-\$0.82	-52.6%	0.9%	270	0.0%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LiVE, Electronic Day Pass / Fare Cappi	-\$0.75	-77.3%	23,102	0.1%	-\$0.70	-76.5%	0.7%	11,771	0.1%	n/a	n/a	n/a	-	0.0%
Full Fare -> Expanded LiVE, Monthly Pass/Cap	-\$1.08	-78.1%	17,291	0.0%	-\$1.01	-77.3%	0.8%	8,884	0.1%	n/a	n/a	n/a	-	0.0%
Youth, 3-Hour Pass	-\$0.03	-7.0%	1,157,628	2.6%	-\$0.03	-7.0%	0.0%	530,072	3.2%	-\$0.03	-7.0%	0.0%	544,022	3.4%
Youth, Electronic 3-Hour Pass / Fare Capping	-\$0.23	-50.7%	519,059	1.2%	-\$0.23	-50.7%	0.0%	100,928	0.6%	-\$0.23	-50.7%	0.0%	88,982	0.6%
Youth, 10-Ride	-\$0.04	-8.4%	293,738	0.7%	-\$0.04	-8.4%	0.0%	125,506	0.8%	-\$0.04	-8.4%	0.0%	105,517	0.7%
Youth, Day Pass	-\$0.07	-20.2%	977,338	2.2%	-\$0.07	-20.2%	0.0%	542,966	3.3%	-\$0.07	-20.2%	0.0%	463,609	2.9%
Youth, Electronic Day Pass / Fare Capping	-\$0.22	-57.9%	636,671	1.4%	-\$0.22	-57.9%	0.0%	297,113	1.8%	-\$0.22	-57.9%	0.0%	153,273	1.0%
Youth, Monthly Pass/Cap	-\$0.08	-23.5%	3,278,599	7.3%	-\$0.08	-23.5%	0.0%	1,197,662	7.2%	-\$0.08	-23.5%	0.0%	839,448	5.3%
Senior/Disabled, 3-Hour Pass	-\$0.09	-11.8%	1,380,298	3.1%	-\$0.07	-10.2%	1.6%	544,688	3.3%	-\$0.08	-10.4%	1.4%	717,243	4.5%
Senior/Disabled, Electronic 3-Hour Pass / Fare Capping	-\$0.46	-55.3%	376,103	0.8%	-\$0.39	-51.9%	3.4%	141,879	0.9%	-\$0.38	-51.7%	3.5%	187,049	1.2%
Senior/Disabled, 10-Ride	-\$0.06	-7.3%	513,507	1.1%	-\$0.05	-6.5%	0.8%	156,459	0.9%	-\$0.04	-4.7%	2.6%	237,795	1.5%
Senior/Disabled, Day Pass	-\$0.12	-22.6%	3,218,739	7.2%	-\$0.11	-20.4%	2.2%	1,062,589	6.4%	-\$0.09	-17.9%	4.6%	1,500,417	9.5%
Senior/Disabled, Electronic Day Pass / Fare Capping	-\$0.41	-61.2%	723,994	1.6%	-\$0.38	-60.4%	0.8%	230,983	1.4%	-\$0.35	-59.1%	2.1%	309,364	1.9%
Senior/Disabled, Monthly Pass/Cap	-\$0.37	-56.6%	3,850,899	8.6%	-\$0.34	-55.2%	1.5%	1,223,565	7.4%	-\$0.33	-54.5%	2.2%	2,383,216	15.0%
Bulk Purchase	-\$0.31	-28.2%	2,839,410	6.3%	-\$0.29	-27.1%	1.1%	1,023,160	6.2%	-\$0.27	-25.8%	2.4%	1,008,397	6.4%
EcoPass (Business)	-\$1.20	-35.9%	2,650,675	5.9%	-\$1.48	-40.1%	-4.2%	617,285	3.7%	-\$1.77	-43.6%	-7.7%	186,283	1.2%
EcoPass (NECO)	-\$0.51	-21.6%	175,506	0.4%	-\$0.27	-13.0%	8.5%	25,821	0.2%	\$0.03	1.9%	23.4%	47,580	0.3%
CollegePass	-\$0.99	-32.0%	714,662	1.6%	-\$0.74	-26.0%	6.0%	267,352	1.6%	-\$0.66	-24.1%	7.9%	321,626	2.0%
Semester Pass	-\$0.48	-38.2%	37,702	0.1%	-\$0.48	-38.2%	0.0%	15,022	0.1%	-\$0.48	-38.2%	0.0%	18,851	0.1%
Total	-\$0.36	-25.4%	44,855,331	100%	-\$0.29	-23.1%	2.3%	16,524,071	100.0%	-\$0.24	-22.0%	3.4%	15,877,120	100.0%

# **Appendix B: 2024-2026 LiVE Income- Based Discount Fare Program Communications and Outreach Plan**

**July 2023**



# Table of Contents

Summary .....	66
Objective.....	67
Current State.....	67
LiVE Program Expansion Recommendation.....	67
Increase the Income a Household Can Earn to Qualify.....	67
Eliminate the Requirement to Have an In-District Address.....	67
Apply LiVE Discounts to Access-a-Ride Fares.....	67
Minimize the Number of Barriers to Enroll.....	68
Strategy.....	68
Key Messages.....	68
Market Development.....	69
Methods .....	69
Transit Equity Office – Targeted Engagement .....	69
Methods .....	69
Marketing and Digital.....	70
Customer Care .....	70
Public Relations .....	70
Transit Equity Office – Language Access.....	70
Target Audiences.....	71
Timeline.....	72

## Summary

In 2019, RTD introduced the LiVE Income-based Fare Discount Program (LiVE program) that allows eligible customers to save 40% off RTD full fares. The discount is available directly to the customer, and they can apply for the LiVE discount through the Colorado PEAK website. Currently, participants qualify if they are between the ages of 20 and 64, live within the RTD service area and have a household income at or below 185 percent of the Federal Poverty Level (FPL).

As part of RTD’s Systemwide Fare Study and Equity Analysis (Study), RTD is recommending changes to the LiVE program that would increase the number of income-eligible customers who would be eligible for LiVE Discount fares. The recommended changes will need to be communicated to the public. This plan aims to identify strategies, resources, and partners to communicate about these changes (once finalized) and ensure that income-eligible customers receive the information and support they need to fully participate in and benefit from the program.



## Objective

To reach and educate customers and the public (especially those who are income-eligible) about changes to RTD's LiVE Income-Based Fare Discount Program, encourage participation in the program and provide the informational and logistical support needed to ensure a smooth transition for the LiVE program expansion.

## Current State

The LiVE Income-Based Fare Discount Program is currently available to customers who:

- Are between the ages of 20 and 64
- Live within the RTD service area
- Have a household income at or below 185% of the federal poverty guidelines, set annually by the Department of Health and Human Services based on household size and income

LiVE applications are processed through PEAK, the state's public benefits website. Customers enrolled in LiVE currently receive a 40% fare discount. LiVE discounts currently apply only to mobile and MyRide 3-Hour Passes, mobile Day Passes and paper and mobile 10 ride ticket books. Access-a-Ride fares do not receive a LiVE discount in the current fare structure.

## LiVE Program Expansion Recommendation

RTD is recommending changes to the LiVE program including increasing the discount from 40% to 50%. Other changes would increase the number of income-eligible customers who would be eligible for Discount fares. These changes are as follows.

### Increase the Income a Household Can Earn to Qualify

Currently, individuals with a household income at or below 185% of the federal poverty guidelines qualify for this program. That means, for example, a family of four with a household income of \$55,500 or is income-eligible for the LiVE program discount. RTD is recommending that individuals with a household income at or below 250% of the federal poverty guidelines be eligible for the LiVE program. Under the new recommendation, a family of four could make a household income of \$75,000 or less and qualify for the discount.

### Eliminate the Requirement to Have an In-District Address

RTD is recommending eliminating the requirement to provide a home or mailing address within RTD boundaries as a qualification for the LiVE program. Doing so would simplify and streamline the enrollment process, provide more equitable access to customers who are unhoused or underhoused, and provide access to customers who use RTD but live just outside of the District boundaries.

### Apply LiVE Discounts to Access-a-Ride Fares

RTD is recommending expanding LiVE discounts to include Access-a-Ride fares for customers who qualify for and enroll in the program. That would mean that Access-a-Ride customers with household incomes at or below 250% of the federal poverty guidelines would be eligible for a lower fare, paying \$2.25 for the Standard fare (all current Local and Regional routes) and \$9.50 for travel to and from the airport. Visit the Access-a-Ride page for more



information. In addition, the age limits for LiVE eligibility would not apply to Access-a-Ride customers since youth and senior discounts are not provided for Access-a-Ride fares.

## Minimize the Number of Barriers to Enroll

RTD is exploring opportunities to work with community partners to help individuals apply for LiVE. RTD is also exploring ways to verify an individual is income-eligible outside of the PEAK system and in addition to income verification by Denver Human Services. Community partners would provide local, trusted support to help income-eligible customers to enroll in and benefit from Discount fares, increasing the use of equity programs. Verifying eligibility outside of the PEAK system would simplify and streamline the process for income-eligible customers who have provided similar documentation through other entities.

## Strategy

Through a mix of in-system printed assets, digital and social media channels, community events, open houses, meetings, in-person and virtual presentations as well as Public Relations efforts, RTD will inform customers and the public about the finalized changes to the LiVE program as a result of the Study.

## Key Messages

- The LiVE program has changed and is now more accessible and affordable
- The major changes to LiVE are:
  - The LiVE discount will apply to customers both in and outside RTD district
  - The discount amount will change from 40% to 50% off full fares
  - FPL requirement changes from 185% to 250%
  - LiVE discount will be available to Access-a-Ride customers
- There will also be a new fare structure that will lower the overall cost of fares for LiVE customers and introduce a LiVE monthly pass
- The LiVE discount is available to qualified Access-a-Ride customers who qualify and enroll in the program.
- The LiVE discount is available to MyRide customers who can benefit from fare capping to day passes and monthly passes if they use their stored value account
- Fare products available to LiVE customers include:
  - The MyRide App and Card
  - Paper fare products available at King Soopers, Safeway, and RTD sales outlets; online at RTD's retail store
  - An expanded retail network to allow cash paying customers to top up their stored value account
- As it relates to applying for LiVE:
  - The application is still done through the Colorado PEAK Website
  - RTD does not require a social security number or an in-District address for customers to participate in the LiVE program
  - Unhoused customers can continue to use a service agency's address to receive their LiVE ID cards
  - Customers without income are still eligible to apply through the PEAK website





## Market Development

RTD's Market Development department is responsible for administering various pass programs and discounts to include Business EcoPass, College Pass, Neighborhood EcoPass or NECO, Bulk Mobile Ticketing, Nonprofit Program, LiVE- Income based discount and other special discounts. Market Development conducts extensive outreach to support partners, clients and the community with the suite of products we provide. Market Development will be actively involved in outreach and communication efforts as it pertains to LiVE as outlined in this plan.

### *Methods*

- Develop messaging tailored to current LiVE customers, non-profits, community organizations and other stakeholders
- Update the LiVE Welcome Letter that goes out to LiVE customers with their ID
- Work with organizations serving the unhoused, incarcerated, and other vulnerable populations to get resources including messaging and helping them sign up for LiVE, in conjunction with our partners at Denver Human Services
- In-person and virtual presentations to TMOs, TMAs, community colleges, non-profits, businesses and housing authorities
- Work with school districts to provide information and options to parents receiving transit benefits through the McKinney-Vento Act
- Participate in other tabling events and community events in collaboration with various RTD departments and outside agencies
- Further leverage the LiVE outreach position at Denver Human Services by connecting them to additional and new RTD contacts, which will enable Denver Human Services to provide assistance to a higher number of community organizations and individual customers

## Transit Equity Office – Targeted Engagement

The Transit Equity Office (TEO) is highly involved with public engagement and works diligently to engage other stakeholders who are part of the equation to build stronger relationships. 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. The agency's objective is to establish a more robust public engagement strategy with the goal of forging positive new relationships and strengthening existing relationships with customers and community members.

TEO will apply efforts to develop or augment a plan to ensure intentional and targeted community participation by incorporating the following tactics, methods, best practices, and most importantly, include our targeted community audience.

### *Methods*

- Leverage the community-based organizations database to disseminate information to community members and opportunities to collaborate on efforts
  - Incorporate outreach where the community members live and convene every day in their neighborhoods
- Partner with the RTD advisory committees, such as Community Advisory Council, ACPD and APAC to secure community involvement and be the essential link between internal and external



stakeholders regarding the LiVE program

- Establish multicultural outreach and engagement services contracts with community-based organizations to increase broader outreach and awareness of the LiVE program expansion
- Partner with trusted and convenient local organizations or nonprofits to help community members sign up for LiVE
- Attending and tabling at community events
- Establish and renew strong and cohesive relationships with diverse community members, which could include but not limited to libraries, recreation centers, post office, grocery stores, cafes, community health centers, employers, apartment complexes/housing providers, refugee agencies and organizations, childcare providers, schools, mental health providers and community-serving nonprofits and community-based organizations
- Leverage community members to share their values, cultural experiences and storytelling of their experiences with the LiVE program

## Marketing and Digital

- Update all current LiVE assets and all discount brochures to reflect changes as of 2024
- Update the LiVE website and all related webpages that mention LiVE to reflect changes as of 2024
- Distribute information utilizing social media platforms
- Utilize vehicle and bus stop/rail station advertisements

## Customer Care

- Provide training to all sales outlets and customer care agents so they have the current and accurate information regarding LiVE and other discounts, in addition to fare products
- Support Market Development and others in public presentations and events as needed

## Public Relations

- Inform media about the fare changes and changes to the LiVE program
- Showcase how the LiVE program makes lives better for our customers
- Update News Stop
- Send updates regarding LiVE through internal communications channels like Inside Connections, Facts-n-Snacks
- Update Read-n-Ride
- Send all LiVE related updates through the PIO list to other partner agencies

## Transit Equity Office – Language Access

Based on 2021 RTD survey data, non-English-speaking customers indicated that they rode RTD at least a few times per week, with a quarter indicating that they rode RTD every single day. The results of this survey along with other national data illustrates that non-English-speaking populations may rely on public transportation services more than people who speak English as a preferred language. Additionally, non-English-speaking populations have a high concentration of immigrants, refugees, asylee seekers and others who, as a result of low incomes given legal and logistical barriers to fully participate in local economic opportunities, would qualify for the revised LiVE program. Consequently, the 2024 LiVE program outreach must ensure that it provides language access to information on the LiVE program changes as well as adequate language assistance support. While all LiVE materials and the PEAK application itself are currently available in Spanish, this is not the case for other languages.



To do so, the following tactics will be employed:

- All Communications assets produced for 2024 LiVE outreach will include a short boilerplate on language assistance services available (e.g., interpretation and translation)
- Press releases will be translated into Spanish, Vietnamese and Chinese and distributed to relevant multicultural media groups
- Transit Equity Office will work with Public Relations staff to offer a Spanish translation of News Stop articles related to the LiVE program expansion
- Transit Equity Office will work with Communications to translate all key assets (e.g., instructions to apply on PEAK) into Vietnamese and Chinese. The most relevant assets will be strategized by priority and translated into RTD's safe harbor languages using the Language Access Plan as guidance and by working with resettlement agencies/immigrant- and refugee-focused community-based organizations to identify the most needed resources and languages
- Transit Equity Office will identify multilingual community-based organizations and events to host presentations and Q&A sessions on the LiVE program updates, working with the appropriate interpreters as needed. Potential organizations include (but are not limited to) Spring Institute, African Community Center, Boulder County for All, Montbello Organizing Committee and DRMAC
- Provide links to the most relevant translated assets on the new LiVE program on the LiVE webpage on [rtd-denver.com](http://rtd-denver.com) as well as other relevant pages

## Target Audiences

The target audience of this outreach should center individuals who would benefit the most from the LiVE program changes as well as the organizations that serve these individuals. Specifically, this entails outreach to people with low incomes, BIPOC, seniors, non-English-speaking populations (e.g., immigrants and refugees) and people with disabilities.

- Current RTD customers
- Potential RTD customers
- LiVE participants and potential participants
- General public across RTD district
- RTD employees
- RTD Board of Directors
- RTD advisory committees
- Non-profits and community-based organizations
- Elected officials and key stakeholders
- Access-a-Ride customers
- Community colleges and related stakeholders
- School district transportation offices
- Partner agencies including TMOs and TMAs
- Business community, including small (SBE) and disadvantaged (DBE) business enterprises
- Public Housing and Regional Neighborhood Associations
- Senior centers



## Timeline

- **April-May 2023:** Final feedback period on the Systemwide Fare Study and Equity Analysis recommendations
- **July 2023:** Recommended fare structure changes proposed to Board for approval
- **June-December 2023:** Preparation of assets to be used in LiVE program communications and outreach (includes drafting, editing, design and translation)
- **January 2024:** Implement Communications and Outreach Plan

## Appendix C: Public Comments Submitted

Public comments were received in multiple languages. Where the comment was submitted in a language other than English, the original, untranslated comment will appear with the English translation in parentheses.

Is RTD concerned about being able to fund the fare free after the pilot? Or are you thinking that can roll forward without hiccups?
I am absolutely amazed at how this process went and in what you have come up with. I think it's brilliant. It will help so many people. Thank you so much for this.
I believe that the fare structure will help especially those who rely heavily on RTD transportation in their daily lives. I believe that it fair policies and programs. Working as a case worker the support RTD provides to our families in immeasurable and astounding.
Thank you for your service during the pandemic, you are awesome.
I definitely appreciate the added security - makes me feel safer to ride.
Please lower rates.
I am all for it! Reduce fares yay!
Yes! Reduce fares!
This is a great package of changes. I'm on board with the higher airport cost as it still is the most affordable option vs Uber or parking. However, I tend to still choose Uber or parking because of the train schedules that don't line up which make an already lengthy journey even longer when you deboard your train at Union Station and find out you just missed the connection you needed. An increase in frequency of trips (or slightly adjusted to make those types of connections more possible) would make me reevaluate using the train.
I agree with the proposed RTD fare changes and believe that if fares were lowered, RTD would be more attractive as a method of transportation around the Denver Metro area.
Fare structure- recommend a tap on tap off structure like in Sydney Australia that you can use credit card or local card. It avoids educating on fares and you can keep short trips cheaper than the 3 hour rule currently. Cost based on tap on and tap off rather than time can increase revenue based on infrequent users and still create predictable revenue and access for frequent users. Recommend researching their system if that hasn't been done. Programs- offer families with school age children who qualify for government programs to access free transit for adults and children. Offer stop gap emergency cards to schools to support families experiencing homelessness, lost a car, or are highly mobile. Right now schools can apply for a nonprofit discount but would love to be able to give out free monthly cards as needed that cover an adult and their children to reduce chronic absenteeism and support highly mobile families with staying at a consistent school. Also having a way to send the passes and cards to schools rather than a centralized location can help networks and individual schools have passes regularly without needing to ship them or drive them to each location.
I think this is a fantastic idea and will help to further encourage greater usage of RTD services!
I wholeheartedly support all of these recommendations. This is the type of policy that impacts our hardest working Coloradans, our young people, and people in need. We all win with this type of forward thinking. My favorite though is the no-cost youth pass! Louisville, KY did this a decade ago and it was a game changer for youth development. Well done, team RTD!
I am a big supporter of the new fare structure. I think these changes will lead to more ridership and they make me more likely to use the RTD system more often. I hope we continue to implement changes like these to encourage greater use of public transportation.

I support the new fare structure that lowers cost and simplifies the fares. I utilize the train to get from my home in Arvada to the airport approximately 3-4 times a year. I also use the train occasionally to go into Denver to attend sporting events, concerts, and meet with friends near Union Station. In all of these cases, taking the train lessens the hassle and cost of parking, which is appreciated. Simpler fare structure helps with our out of town guests as well. It's great to have the train as an option when friends are visiting from out of town, so they can access the city and the airport independently if needed. I also really appreciate the changes to the policies and programs to help make utilizing the train an affordable and accessible choice for all populations in Denver. I think these programs and the efforts towards Fare Equity will go a long way to increase the use of the train system in Denver. I do wish the Gold line ran more frequently and that there was expanded access from Denver to Boulder. Maybe with increased usage over time, we'll see initiatives like these become a reality.
I really appreciate the overall simplification of fares, which will benefit everyone. Although I use the RTD app, which makes paying easy, it can be tricky to figure out how much a trip is going to cost these days. The new plan will be easier. Also, as a Senior, I'm excited to note the lower cost, especially for trips to the airport. The new package looks good!
I believe that the fare structure will help especially those who rely heavily on RTD transportation in their daily lives. I believe that it fair policies and programs. Working as a care worker and the support RTD provides to our facilities is immeasurable and astounding.
Thank you for your service during the Pandemic. You are awesome.
I definatly appreciate the added security makes me feel safer to ride.
Fare structure can be confusing especially when using bus+ lightrail/commuter rail. Also a study needs to be done to make routes more efficient. RTD is usually slower than driving in traffic. Accepting credit/debit card would be useful too.
Lower fares enable people to get to work, improving the city economy!
I would like to see the Recommended Fare structure implemented. Also return of the FF2 route and the promised Boulder-Denver rail line.
Simple is better and encourages more riders
Great to make available to those most needing services and more accessible.
Its scary. (I just have anxiety, nothing against RTD)
I have taken RTD since 1978. Only stopped during co-vid and have not started again. Concerns are park-n-ride safety and union station. Otherwise I feel RTD does a great job.
I like how often the rides are.
Like the "spin the wheel" that they added, like the ambiance and info that is given out. Like the offers that are given out as well
Love it! No more local/regional fares is a great idea!
One flat rate would be nice so its not complicated
I want fare change for cheaper fares
Standard rate for everything It is very confusing
Fares and charges should be lowered for non-students and the youth. Youth/children should have lower charges or even no charge at all depending on their ages. Children have no concept of traveling and are often with their designated guardian or adult, which should be enough charge for their ride alone.
Fare simplification would be benefit our region. We live between N-line 112th and 104th station and it seems odd to change regions between the two. Using a local-only fare would allow us to use all stations equally and benefit lower-income commuters in the higher density areas north of 104th station.

The goal of a fare structure that's easy to understand and affordable for all is spot on. A simple and affordable fare structure by default should be equitable too. The youth population would be well served by the improvements. The Zero Fare for Youth proposal is most promising not only as a method to increase access to the transit system and promote transit in the near term but also to cultivate future patrons of public transportation. Many thanks to RTD staff for conducting this exhaustive study.
Really good and helpful survey
Charges for riding the RTD bus, being a student is fair however can have safety concerns regarding the bus in general. Generally, I feel and agree with the study's decisions to have a reward system for frequent users, no fees for children and better discounts for elderly or even vet. Children under the ages of 5 or 6 should not be charged or have a significantly lower fee due to their age. A rewards system would not only benefit present users but also encourage more people to use public transportation frequently.
RTD is really helpful for people with no transportation.
Its really helpful for people with no transportation.
I cant tole feeling unsafe on the 4te anymorer
The new recommendations are needed and appreciated
Make regional pass be for more than 1 day
Reduce fare is great IDEA- For Retirees
The transportation in certain neighborhoods where people of color live is decreasing in availability the RTD board should look at studying the lack of access they are providing to people of color in a lower economic bracket.
I really like taking public transportation but I don't like going to Union Station Because of the homeless people. They should only allow people using public transportation to enter the building. Otherwise its great to get around.
Can you get the 10 bus to Aurora CO. It was going over there. Now it don't.
I have an elderly mother 95 who I take with me on excursions for fun and stimulis. The ride you offer is great but I could do it more with lower fares. My sister-in-law was mentally challenged and she rode your ride daily. It was a life saver! Thank you. Esther
I agree with the statement
Bus Passes are Reasonably Prices (114) - SAVES Money. ECO Pass Available for ECE-Catholic Charities? Please look into it.
Fare pricing needs to be controlled to allow access to all income levels!
I needed to ride RTD for work 2010-2015. I was living on less than \$20K /year. Every dollar counted. Someone in the position I was in needs the change in fare. I'm all for it.
I would like to see the fare on RTD be lowered to help people that can't afford the fares as they are structured today. Veterans should have a discount, students, the over 55 riders. Thanks. PS: RTD should also make a way to give jobs to people that have bad things happened to them and give them a second chance at life. God's giving us a second chance. :)
I think it's a great idea
All riders should pay something, the "No-cost transit for youth ages 19 and under through the Zero Fare for Youth pilot" will encourage vandalism and will impose rider safety issues from violence from under 19 riders.



Overall, the recommended fare structure goes a long way towards making RTD more affordable and easier to use. However, increasing the time window for a single fare from three to four hours would make it a more appealing and useful option for riders. With the current three hour travel window, many riders are forced to purchase a second fare due to traffic congestion, transit delays and other circumstances. A longer travel window would give riders more of a time buffer against delays to complete their trip. This would make the fare a more practical alternative to a day pass for riders wishing to go to a single destination, such as a medical appointment, grocery shopping or other errand. Therefore, while the proposed regional and monthly pass rates as well as the consolidation of the local and regional pricing helps encourage commuters to ride RTD for long distance trips, more could be done to make public transit more compelling for shorter trips. A lower priced base fare or a longer travel window would encourage more people to choose RTD for local errands and appointments.
I like the streamlined pricing. I think this is a step in the right direction for more equity with ridership.
I feel there's a real need for customers to feel safe before you can bring back customers to riding more. Once we have established safety I think proceeding with more routes, particularly at rush hour times. It seems we've taken away routes instead of adding.
I frequently visit a good friend in Collinsville, Illinois. That is 29 miles from the airport (but not the end of the line, which is Scott Air Force Base. From the airport to Scott AFB is \$2 for seniors. The return trip fare is based on the station where I board the train. My 29 mile ticket is \$1.25.
The recommended fair is still too excessive if you consider someone who works at the airport has to pay \$10 one way per day equaling over \$300 a month. I own a car and would like often to take the train instead but it's cheaper to drive the car even at the gas prices as high as they are today. Because the stops are so close together the regional ticket should be abolished and that should just be all local there's nothing that far apart in the metro area. In Dallas you can go between Dallas and fort Worth for \$10 all day long on a day pass on the train you can also have an option on the bus to buy a day pass for just double the single ride pass and it lasts all day. The reduction of the tickets you have proposed are literally 25 cent less or 50 cents less not substantial enough to make a difference the \$88 a month pass seems to be the best option but many low income people are not able to come up with \$88 at one time. A weekly pass maybe a good alternative thank you.
I think this fare structure is a really good choice. Standardizing fares for all non-airport journeys should have positive effects on ridership. And the reduction in price for monthly passes is a great idea from both a ridership and equity perspective. These changes need to be implemented as soon as possible.
Please include all students who are registered/enrolled in high school in the pilot program for free RTD access (this includes students with disabilities who are over the age of 19 but are still enrolled in public school)
Charge what you like. I can't afford to become a drug addict by riding your vehicles.
I like the proposal, I feel like it would encourage me to ride the commuter rail more often.
I am someone who mostly uses transit to get downtown for leisure activities (I work in the neighborhood I live in). But the Zero Fare for Youth pilot program really excites me. Right now my son is 3, and I find it reasonable to pay for a ticket for myself and take him for free on a visit to downtown. But I've already thought that I wouldn't be as likely to do so after he gets older and passes the age limit to ride for free. And after we have a second kid, whoo! Definitely wouldn't see that as an inexpensive way to get around. I love the idea of increasing the age limit for youth to ride free. It would greatly increase my likelihood of continuing to use public transit.
Hello. I am over 65 and occasionally use RTD. I like having one fare for all zones. Also, and this may sound strange, but I think the discounted fares for seniors are too generous. For me to go to the airport for only 1.35 is amazing. Great for us, but a loss of revenue for RTD.



I don't mind about the cost of the fares so long as we, the riding public, are safe on the bus and trains. What needs to be addressed is the safety and welfare of everyone. I have witnessed people doing drugs inside the train and the filth left by those who have nothing to lose in life. While law abiding people are like zombies inside - not moving for fear of their own safety. I have seen the decline of paying and law abiding public riders because of this mess. Even RTD employees are saying they won't allow their family to ride public transport anymore. Police visibility is key. It pains me so much to say that this is no longer the RTD I used to know. I feel sorry for the situation it is in now. Thank you.
nope
I very much support the simplification of the fare structure. Hopefully it will make all users more inclined to use RTC and for RTD to then enhance (increase) service along key corridors to at least every 15 minute frequency. I appreciate that outlying counties pay for service (and deserve it), but we really do need to focus on the everyday trunk line service instead of commuter service. I hope that these economical pricing tiers make that more feasible for more people. I particularly like the \$88/monthly pass as that seems more likely to be purchased as a "nice to have" option even for someone that may commute by car a few times/week. I think the fare capping is great, but probably needs to be explained a few times (and doesn't work with cash), so distribution of farecards may be a good promotion even if they only have one ride pre-loaded (but the card is reloadable).
I would bet that the August month last year when there was no fee to ride transit went over well. I think it would be good to try a Transit Week several times during the year. Get companies with staff working downtown to get a break. Also, the buses, such as Number 10, Number 0, the Mall Shuttle all have maintenance issues--have you travelled on some of these buses yourselves??? I would guess Number 15 is the same way. Thanks for listening.
The proposed fare change is a good idea for all
After learning that the RTD My Card and app can be synced, I had to spend quite some browsing and searching Google/RTD for info on the app. Finally found the section and ordered the card. There needs to be more education on where to get the card and how to sync it. Phones do die and this is a great alternative for when you don't have your phone and or don't want to carry. Also if buying through the card/ app maxes out at the monthly pass price under the new structure. Why can't that be implemented now even under the current structure???
Registering my support for the new fare structure. As a Boulder resident, I know that lower regional fares will make me use RTD *more* often to get to and from Denver. I am also in support of any policy that makes public transit more accessible to low-income residents and visitors.
I think it should be similar to how Minneapolis does it. Plus no extra fare to get to the airport. Not every employer pays for an Eco pass, or for parking, and it can get expensive for employees who work there.
The proposed fare structure is still too expensive. RTD should lower it's fares even further to assist low-income riders, disadvantaged communities and the environment.
As a senior citizen who has a disability and mainly uses public transportation, RTD, I am very grateful to those who have worked tirelessly to create the new fare structure. Since I live on my Social Security checks my income is set and with 1) so many services 2) rent 3) food 4) medicines and 5) phone use going up, RTD'S efforts to show kindness and consideration to populations such as mine is a Godsend. I also live in a virtual food desert so a walk doesn't get me to a viable grocery store. I believe this will help many people in the Denver Metro area and beyond. Thank you for your extensive work! I'm definitely a fan of RTD!
The new fare structure would be great, and more affordable.

<p>I highly recommend this fare structure! RTD's fares are some of the highest in the country and do not provide value for money in my opinion. I commute to the airport 5 days a week, and the new monthly pass cost would make it much more feasible for me to take the train almost every day. In addition to the new fare structure, I also recommend that RTD implement 3 and 7 day passes, like many other transit systems have. This will make it more affordable for visitors to the Denver metro to travel by transit rather than having to Uber/Lyft or rent a car.</p>
<p>Good revision to the fare structure. Easy to understand and simple to follow.</p>
<p>While the no cost fare idea for Youth may seem attractive, experience elsewhere demonstrates that some youth will choose to simply board RTD for a frolic or, worse, to annoy or harass other passengers. Large city transit (NYC, Phila, LA, etc) companies are having significant problems with youth, including gangs and delinquents who prey upon other riders, occupy handicapped seating and generally engage in boisterous or disrespectful conduct; regrettably this is fact in 2023. (Look at experience on Mall Shuttles , Union Station, etc). RTD needs to charge all riders some fare -even if modest or nominal - to preserve the ability of bona fide users from joy riders, etc. If this is ignored, no one will choose to ride RTD and subject himself or herself to annoyance and harassment.</p>
<p>Your pricing structure for ECO passes does not make sense. You charge companies a flat price based upon number of employees regardless if they would use the program or not. If this is not intended, this is exactly how your contract is interpreted. For instance, one of the largest locations for employment is the airport (over 35,000 employees). Airlines refuse to buy into the ECO program because you are charging almost \$60.00 per month, per employee that they have (not that are local). Based upon the definitions of ECO pass pricing, they have 1000's of employees across their companies (not all local) so most of what they are charged for could never participate. Therefore, you are missing some of the largest employers in the region (remember that + 35,000 employees at the airport) because it is cost prohibitive for them to offer such a benefit; especially when parking only costs \$36.00 per month for employees. Why be overcharged due to out of state employees and also pay almost \$60.00 per employee, when they may pay \$36.00 to the city for parking? With your current pricing structure you are missing great opportunity for the very large employers such as airlines and concessions. Make it simple and offer a blanket cost for SIDA badged employees at the airport that is competitive to the \$36.00 per month parking fee).</p>
<p>I am hugely disappointed in the lack of innovation and creativity in this study. I was expecting a refresh in fare structure, including at least considering the possibility of abolishing the 3-hour pass that no one likes; and all we got for regular fares is a 25-cent discount and no more regional level?? Did you know that Denver has one of the most expensive transit systems in the country? It is cheaper to drive a family of 5 to the airport and park there than it is to take the train--one way! In every other city I have lived in, fare is based on how far you're traveling, not a fixed (and very high) price. If I am taking a bus 5 stops down the road, why the heck am I paying 3 dollars?? Sorry, \$2.75. In other cities that would cost me a dollar, maybe less. This study was a wonderful opportunity, and it was completely wasted. Shame on you, RTD.</p>
<p>Of course I think the new fare structure looks great - simplified and much cheaper. But however will you meet operating costs at those rates? We are not low-income, but I always do keep in mind how to help low-income people - while high earners can afford more. High earners should pay more, but less than it would cost drivers to park downtown. Many corporate jobs with good benefits offer transit pay, e.g. I used to receive \$65 a month to offset the cost of taking mass transit. \$6 for a day pass is perfectly reasonable. For the monthly pass, there should be two rates - one regular at \$200 per month, then a \$90 one for low-income or airport employees. For people using the A line just for travel - make it more expensive, but less than getting a cab/Uber ride or paying for parking. e.g. I'd pay \$20 for a round trip to the airport when traveling. (However I DON'T use RTD to go the airport because I don't trust the train to actually get me there / on time to make my flight.) I realize you can't</p>

rescind these low prices after you've publicized them, but obviously if you couldn't be profitable at the current rates - you're definitely going to be in the red with these rates that are lower than they need to be.
Excellent! The new simplified approach and thoughtful and appropriate discounts should really motivate more people to use RTD!
Hello. I voted for light rail and am a believer and user of public transportation around the world.....as long as I feel safe on it. I DO FEEL SAFE ON THIS LIGHT RAIL SYSTEM! I used to, but I no longer do!!! I am very disappointed on how it is being overseen. There needs to be consistent security on the trains and at the stations! I stopped using light rail after too many encounters with a lot of the passengers struggling with mental illness, homeless riding it to stay warm, out of control youth and drug users. It is an absolute shame and something needs to change before I will go back to using it in our city.
Senior citizen fares should be less than 50% of full fares. Also, because of safety concerns for the very elderly, consider free transit for anyone 75 years of age or older using public RTD services.
This is great! I think it simplifies a lot of things while encouraging an interest in use.
The people that are using the RTD system, need better prices and easy access to buses and train
Please reduce the day pass to \$5! Also, the light rail feels unsafe at times. Is there a way to increase the presence of RTD staff or security especially at Union Station?
The fare changes will help so many individuals that rely on public transportation. Our non-profit will be able to help more clients with the lower fare rates. Especially monthly passes. I like the idea of the youth not having to worry about having money to get to school, work, and home. It may help some avoid having to choose between bus fare or eating that day. It can help the kid who is forced to take the bus, but can barely afford it. Everything is getting more expensive, and would be helpful for our community to not worry about affording public transportation.
Good job
I don't ride the bus
I don't catch the bus
Please start enforcing the fares. It is pathetic how many homeless and drug addicts just hop on these trains and buses and move around freely wherever they please around the Denver area. You wouldn't need to increase the fares constantly if there was enforcement. People living in the outskirts of town aren't going to ride the light rail if they don't feel safe and all that recent expansion will be for nothing. Enforcement is absolutely necessary.
Its cool
Riders from N Line 124th Eastlake Station waited a long time for the train while paying taxes toward the project, then were penalized with higher fares. Abolishing higher fare zone ends confusion about fares and makes fares fair for all riders
nothing
fundamentally REGIONAL TRANSPORTATION is inequitable and impacts most of all indigent people trying to go to and from appointments, work and take care of families, but also, people who have fixed incomes. For all of these people the transit needs to be more robust and free. The inequities of not being able to live on the corridors of the transit system and for people, like myself, who use bicycles the RTD system and its connections are fraught with limits and scheduling where to catch the trains making connections for outlying areas is unwieldy. We need a cross-section of transit options that accommodate people who have medical and mental challenges. IF we really want to make transit

safe then trained mental health and behavioral health personnel must be available for riders who are unable to negotiate the system. We live in a world of equity, inclusion and diversity without making transit a stable form of transit for everyone, no matter what their circumstances and the time of the day or night, or the weather. Respectfully,
none
Much overdue reform in fare structure... the recommended fare structure is just, equitable and progressive -- it earns my 100% endorsement
why raise if alot of time the bus does cancel and put people heading to work in a bind
I completely support the recommended fare structure.
I love this idea! As someone who rides RTD a lot, there are times I forget my pass. I shouldn't but I do. Having better pricing takes it off of my mind about having to think about how far I'm going. Or if I need to bump up my fare. Very helpful!
I like the new prices. I have never gone to the airport on the bus. Maybe I will now
I hope the routes don't get cut back because it costs less.
The local is good. I don't leave Boulder so the others don't matter.
I wish the bus was free but these prices are better than before.
No comment
I catch Montbello Connector, the bus doesn't run by my house.
Nope
I don't ride the bus
N/A
none
N/A
N/A
Nothing above.
none
nothing
no
No
Not
Nothing
Nothin
none.
Nothing.
None
None
Nothing
Better fair
None
The open house was very informative for the public, veey organized and I think was very successful
I don't really take the bus but I might now. I like the local price and they said it's less with my LIVE card.

I get the regional and the new price is good. I think local should be less or free.
This makes it easier for me to go to Denver because it's cheaper. Thank you.
I like the prices. Are babies free. I have to bring my baby and I hope I don't have to pay extra for her.
I like the local. I can get around Boulder better now.
These fares will make me take the bus more. It is a lot cheaper which is good because I have a lot of places to go to. I hope the drivers have change its hard when they keep the change.
There should be a fare for people who are disabled that is better than these. Focus said I can still get my discount on top of these fares but it's not in writing so I hope you all are still going to do that.
The new fares are great. It makes it easier to get around between towns. Thank you.
I go from Boulder and Longmont a lot so I really like the regional fare. The bus is free in Longmont so that doesn't matter much to me.
I don't really take the bus in Boulder. I like the light rail in Denver. If the bus and light rail changes are the same the regional change is the best.
I really like the regional price.
I agree that the fares are a better fit for people riding the buses & trains
Please clean up the trains. They do not feel safe since they are rarely patrolled and the fabric seats are disgusting germ factories. Tired of people smoking pot/cigarettes/cigars on the train. I will drive and sit in traffic because I do not feel safe and the trains are disgusting.
You should like, destroy most of the R line and re-do it. All the other lines go fast because they go straighter. The R Line sucks because there's like a bunch of tight curves or whatever. It'd be a lot cooler if it followed the freeway and went faster n stuff. You could still use the old tracks that you've already built; just turn it into a trolley or something and build a new track between Colfax and Florida for a properly fast light rail. Also you could add a stop next to the In n' Out Burger, that would be cool.
I like the new fare structure it's so much easier to understand I just hope that if you get increased riders you do ensure people are paying and not using it as a moving homeless encampment.
I use live program this is so convenient instead of loading my live card at King Soopers. Thank you
I have many clients who rely on RTD and we would love to help them more w/ funding, it has just been too expensive for our small family resource center to provide help w/ this bc of high prices. If the prices were lowered we would be able to help them out more!! So exciting!!
It will increase ridership because more people can afford it and increase airport train useage
I think it's great to make public transit affordable for all and reasonably priced for all. Going from 200 to 80\$ makes it redily available for all
please make fare more fair for people on low income
It would save me so much being homeless my two kids can benefit from free bus fare to go to school, work
It would save me so much being homeless my two kids can benefit from free bus fare to go to school, work
Removal of regional fare - Yes. I think it will make traveling simpler and more affordable.
I thought the fares were pretty fair before but I'm happy to be able to tell my friends the airport will be cheaper.
I support all of the above and will park my car and take public transportation IF it passes!
Think it great that RTD is thinking about changing the fare for monthly pass and free student fare.
Love the free fare for kids and would love to see it made permanent! I hope my son will be able to take the bus to hang out with friends and go to events and this would make it so much easier! Also we take the bus and train to Boulder and Airport so appreciate the fare reductions there. Finally, so many

people in Denver struggle to make ends meet, so cheaper fares and LiVE changes will really help make their lives a little easier.
I think RTD is changing people's lives within the community. I am thankful for the beneficial free fares for our youth. I know a few kids that need this so much! This will help them succeed. Thank you RTD.
As a parent with two kids, free youth fares would encourage us to ride the train more often. The additional cost of paying for the whole family makes it more expensive than parking, so we usually drive. We are season pass holders at Elitch's, so this would definitely be useful for us.
I live near Green Valley Ranch and my work is on Jackson Gap Rd. The area has more warehouses and factories but they are having trouble staffing because there are no transit options. Would like if they expanded the 42 or 45.
As a senior living in the Baker neighborhood, fervent about traffic/pollution/transportation issues in Denver, I fully support lowering prices for monthly RTD passes. Let's make ridership accessible and affordable for all, and reduce car traffic!
Like the idea of creating a monthly pass that encourages regular use including airports. Also like the social equity aspect of the Live program.
I like the proposed fare reduction and simplification. \$1.35 fare doesn't make sense for low income - make it a whole \$ amount.
I want to see the transit system continue to grow and connect communities. We need more routes, decreased fare, cleanliness and safety measures increased for Colorado (Denver) transit system.
These changes to the economic system is so great and creates a more accessible community and will ultimately help the environment!
As a student who doesn't have a car, these changes are fantastic! I'll be more able to get to work.
Love this! Making public transportation as accessible as possible financially is huge and helps people have more economic opportunities.
I think it's mucho bien. I'm 64 and there's not a lot of work and it would be good to do that. I live in Denver.
This will be good for a lot of people who're disabled and don't have a lot of money. I'm surprised it was so expensive.
I ride the buses a lot and me and my wife are on SSDI and the cost of what it was was way too expensive. A cheaper pass means we can put it to something else.
I take the bus every other day. I'd much rather have it cheaper because the fare seems like it goes up and the town halls feel useless. This should help people take the bus more but I would like to see it lower.
I like it! Thanks :)
Overall, I support the new proposed fares. The best change is the Regional monthly pass fee. This will help many achieve access. The minimal reduction in single adult fare is not as good. Still room for improvement there to help our community achieve access to public transportation.
I live in Broomfield and needed to commute to both Boulder and now Denver for the 4 years I have lived here. Many times I have considered and honestly dreamed of using public transportation, but driving has always been more timely. Now that I work close to Union Station, I am again interested in using public transportation. The new fare structure would make it much more appealing for someone like me, who lives in the suburbs to use the bus. Even though the time it takes to get to work may not change due to these policies, the reduction in fare rates makes it much more worth the time. I wish Colorado could be a leader for the country when it comes to public transportation and though we have a long way to go, these new fares, policies, and changes that create greater accessibility for those in need, is certainly a step in the right direction.
I think these lower fares would be very helpful for people like my wife and myself.



The 3-hour window should be increased to 4. When I go to the Performing Arts Complex I end up having to pay a fair both ways because the window is not long enough. At this point it almost makes it non practical because I could just drive down there and pay for parking for a couple bucks more
I ride the bus to and from work and think the amount to ride is a little expensive, the proposed amount would be great.
The reduce rate of Live will help so much on bringing in more riders weekly, if not daily, for even individuals on fixed income.
I am all for the proposed fare structure change and think that free fare for youth will greatly increase use and accessibility for many many people
I am in support of the proposed structures. I wish there was Apple Pay.
I am all for a lower fare for the bus considering it is the daily commute of my daughter to and from school. Also the free youth fare for a year is an awesome idea to bring youth out into the community and around the city
I appreciate the reduced fares and actually think they should be free. If they are simplified, I think they should be rounded to \$2 for a few hours and \$5 for all day.
Elimination of zones is so smart! We have to do that. Good on ya
It's better to lower cost for RTD. makes me w Less worried about public transit.
It should be cheap for those who cannot afford to pay/afford a car.
It's great to reduce the price of public transport to get more cars off the road
I think that the fair structures look fair. I like the day pass option that is affordable
I think the new fare structure is an improvement. I do think there should be youth fare discounts
I believe public transit should be free for all. Anyone that rides public transit is doing thw world a favor. Less cars on the road. Less gas consumed. This should be rewarded with free fare. Its not a handout. Its a way if life and it is helping preserve the world.
Support the lower rate of bus passes. Would like to see more light rail.
Cheaper fare
So more people can benefit. Also maybe more working people will once again take this transportation. I am now concerned about taking it because there is so much violence
Bring back the 16L!!!!
If you really want more people to ride RTD, I would suggest a fare-free month. Then more people will ride and enjoy the trip.
I think the new fare structure seems much more simple and I am excited that youth will ride free and costs across the board are decreasing a bit!
Please lower the fare structure to 19 and younger free...thank you
I agree with lower fare prices
Love the simplified fare structure and that kids ride for free. Thanks for supporting families!
Reducing fares, especially monthly passes, makes using RTD much more likely. Reduced local fares while keeping airport fares up seems smart. PLEASE give free fares to youth to promote transit usage at a young age
Appreciate the reduction in monthly pass amount. Great work
Make riding safer by removing non paying riders that do drugs on the train
Love the changes, and how it will be less confusing!
Love the reduced monthly pass cost but please bring the discount 3-hour pass cost down to \$1.00 and daily pass cost down to \$2.00 as RTD does not give change. This will help make RTD truly affordable for people who need it most! Thank you.

<p>It's about time fares came down. RTD was my only mode of transit other than my bike for years and i would watch the fares go up while quality of service and service in general decreased or remained the same. I remember when fare for a monthly pass was under \$100 dollars and it was affordable then. After Covid hit there were service interruptions as was to be expected, and the busses and trains began running on a weekend schedule which meant some routes were and lines were no longer running, (such as the 122X) but the worst part about it was over a year later service was still structured like this with no plans foreseeable to return to normal schedules, and yet fares remained unchanged. Many riders, myself included felt outrage at this. Not only had we seen a steady annual increase in fares and a drop in services anyway, how could RTD in good faith be audacious enough to continue to charge it's riders a full fair when they weren't providing the whole service to its riders? Inwas paying \$114 dollars per month for what? Maybe 3/4 of the use routes and lines offered. RTD really dropped the ball on that one and for the first time in my ridership did I feel like I was getting taken by RTD. I hope this plan goes through, and prices do come down. The riders are owed at least that much.</p>
<p>Why not set the age for Senior Fare to 60 or 62 ? Many seniors take Social Security at 62 and are retired.</p>
<p>What would the rates for seniors be</p>
<p>Really hope the bus fare can go down xoxo</p>
<p>I am concerned about the under 19 free fare, basically a good idea but might encourage delinquent kids to act out, commit crimes in places outside their neighborhood if they could just get on wherever.</p>
<p>Homelessness and crime.</p>
<p>Lower fares for low income/disabled and also free fares for children ages 19 &amp; under would be beneficial to our community</p>
<p>I see two significant problems with the proposed fare structure: 1. \$10/person each way to the airport, which is \$40 R/T for a couple plus \$2/day parking, keeps private vehicles and off-site parking an attractive option. For a family of 4, \$80 plus parking. The Airport should cost the same as regional fares. 2. The flat \$2.75 fare has people living in higher density areas--a responsible decision--and taking short RTD trips subsidizing those living in low-density exurbs. Philosophically, this is backwards, but has always been the failing of RTD: its focus on moving people around the suburbs.</p>
<p>Everyone needs equal opportunity</p>
<p>SEIU Local 105 represents over 8,000 members across the Denver Metro Area, the state of Colorado and the Mountain West. This comment is specifically made on behalf of our Denver Metro Area members that have difficulty affording and finding accessible transportation to and from their jobs. Our main concern is that the companies that directly and indirectly employ our members say that the Eco-Pass benefit some of them provide is too expensive. Although SEIU Local 105 welcomes the proposed fare structure for businesses, it may still fall short to satiate the need for a better public transportation experience. This is especially true for areas that currently are far away from major populated centers, like Denver International Airport (DEN). But the need for a better RTD service is also true for our 2,500 janitorial members that clean office spaces across the Denver Metro Region. Most of this work is performed after working hours, when schedules are sparse, presenting a major difficulty for our members to get back to their loved ones. The issue of high costs for the EcoPass for employers is also at play. Given these two examples, DEN and the Downtown area and metropolitan suburbs, SEIU Local 105, strongly encourages RTD to look into creating special incentive zones similar to what other cities have enacted, including in our own backyard: Boulder. The City of Boulder Community Vitality Commercial District, where businesses within a certain geographic area are automatically part of a program where their employees receive a free Eco Pass, is a prime example of</p>



<p>what RTD could accomplish for DEN and the main commuting regions within Metro Denver. Another idea we welcome, specifically to the DEN workforce, is creating a system of free employee-only shuttles to and from the airport, connecting with the A-Line, that should also be free to DEN workers. Airports around the world have a dedicated transportation system for their employees and as a world-class airport, DEN, RTD and the airlines should work together to study the viability of this alternative. SEIU Local 105 has also heard about RTD's conversation to create a master transportation contract with the airlines at DEN. This master contract should include the contractors and sub-contractors that provide services to the airlines. Designing a program that excludes the workers that, through other vendors, directly and indirectly, support the airlines, is a program destined to fail. Our union looks forward to engaging RTD, DEN, the airlines and other regional and city government officials to provide additional input and testimony on why contractors and subcontractors of airlines need to be included in any master airline transportation contract. It is crucial that fare policies and programs are regularly evaluated and adjusted as needed to ensure that they continue to meet the needs of workers and low-income riders. If we all want to make Denver and the Denver Metro Area more green and accessible in terms of jobs, housing and basic needs, we need to find ways to improve and fix the public transportation grid. Ultimately, by prioritizing the zones of greater usage within populated centers, but also in far away regions like DEN, RTD can create a more inclusive and efficient transportation system that benefits everyone in our community. I urge you to carefully consider SEIU Local 105's recommendations and to work towards creating a more equitable and accessible public transportation system in the Denver Metro Area.</p>
<p>Looks great! Much simpler and will really help low income families! Looking forward to the new rail line to Boulder/Longmont. Hope there is a stop in Gunbarrel!</p>
<p>I really like the simplicity of the new fare structure. I think it will help riders understand it better. While I appreciate the lowered fares, that personally doesn't impact me as much. But grouping the local/ regional together is very helpful.</p>
<p>I just think there should be lowered it's really outrageous to have to commute when a lot of people are still feeling the covid stuff and it's hard for people to come up with the money for a bus and get from here to there my self I get help from the empowerment group with bus passes but it's before that I would have to constantly try to figure out how to get bus where I needed to go so if you guys would make a structure it's a little bit lower the people could reach for people that are in the lower income phase or like you said discounted that would be awesome I need to start helping the people more thank you very much for your time</p>
<p>Bus are very unstable especially on weekend. Bus route is to long especially on the 76-Wadsworth especially when it snows. We have to wait on 3 or 4 hrs for the Bus. No real back up on the routes. We have to wait 3 or 4 hrs for an asser ride and back up driver - for when they breakdown call from dispatch to let us is the bus is running down. Why don't you will try a volunteer dispatch service for someone closer the call instead of having a customer waiting 4 or 4 hours.</p>
<p>I strongly support the streamlining of RTD's fare policy, and appreciate greatly the decreased cost of both individual fares and monthly passes!</p>
<p>Being elderly and disabled and on a fixed income, it is hard to make ends meet as it is. It would be greatly appreciated if I didn't have to pay so much to ride the bus, which gives me access to my community and various, much needed, resources. Respectfully, Donna</p>
<p>Thank you for simplifying the fare structure for everyday work commuter, such as myself. It might be too complicated but I'd love to find out how you all applied a fare equity analysis to this process.</p>
<p>I'm thrilled to see an \$88 monthly pass. Between the reduced price and fare capping, it makes the decision to take RTD instead of driving a no-brainer. The simplification and price reductions of the employer pass programs will make it easier for employees to talk about starting a pass program with</p>

their employers. Hopefully, the simplification and reduced fares will boost ridership in a way that increases riders sense of security/safety and leads to increased frequencies on popular routes.
I think the proposed fares will do a great job in providing RTD access to lower income citizens and those that need the service as a necessity. The recommended changes to the employer provided structure will further access to those that aren't being paid enough vs. the cost of living. Thanks for this effort.
have an equal fare and help more the older people and kids, and have a lower fare.
I'm 67 years old. I live 1/2 block from the 28 bus. Will I be able to pay \$1.35 to get on the 28 and then get a transfer at the
I'm 67 and live 1/2 block from the 28 bus. Currently, I can pay \$1.50 and take that bus to the Central Park train station and then pay \$5.25 to take the train to the airport. If I understand correctly, under the proposed fee plan, I will be able to pay \$1.35 for the bus and get a free transfer to take the train from the central park station to the airport. Is that correct, or will I have to pay an additional \$1.35 to take the train to the airport?
The changes on Discount and adding LIVE to AAR are going to be a great improvement Please approve this!
I believe a lower fare structure would benefit all involved because more ridership supports better air quality
80% of RTD drivers are jerks!!
I would like to start training at a recreation center to build up strength and endurance. After I few months then I would like to take the POST test. The test will be Police Officers Standards and Training test. The whole time while I am training at the recreation center and at the police academy I would like to have some help with the bus fare. I would be nice if the rec center and the police academy could work with RTD to reduce the bus fare.
This is a good program for my people. Thanks
More space for fat tire bike Change back when I pay \$5 bill Thanx for the meating more info in hispanic community if rate come down I don't have to think on cost of the trip and go to practice and park
It seems to me that the proposed fair structure is much more fair and easier to understand. I am very much in favor of expanding the access and discount fair program.
I don't ride the bus very much but I will take it more now. I like the regional all day price. The local is better also
I buy the monthly pass regional/airport. Currently it takes me 20 commutes per month for the monthly pass to pay off. Some months I don't meet that threshold. Under the new structure, it would take me 9 commutes. This is such a vast improvement for me and would conjure no hesitation in my monthly pass purchase. The monthly pass encourages me to ride RTD even when I "need" to, so cheaper monthly passes would be a plus all around!
I believe that the fares prices should be much lower. A majority of people who use the public transport systems are lower income folks, and it doesn't make sense to charge so much. Reducing prices ensures equity of the public transport system. Reducing prices will also increase the number of folks who use it, reducing our green house gas emissions in Denver.
The regional for the day is the best price.
These prices are great especially the regional. I think the bus should be free for veterans but these prices are good for everybody else.
I wish it was all free for people with bad health. We have to take the bus a lot for our medical stuff.

The local I don't like because I am in Longmont where it is free. The regional is good because I have to go to Boulder once a week and now it's cheaper.
The regional price is the best. I have to go from Boulder to Longmont a lot so this saves me money since the local is free in Longmont
Absolutely appreciate the effort to bring equity to RTD. Cannot wait to see the positive impact these fare changes will bring to the communities of Colorado. When I was younger I relied on the light rail to go to school, today I use twice a week to go to work. Thank you for all the positive changes you are bringing to CO. Great work to all the people involved in these changes.
I really like the local one. I can take the bus more now.
Looking forward to the new rates to share w/ people.
The regional price is good
This is too much. I am homeless and I can't pay this. The bus should be free if you are homeless.
I like the new changes RTD is proposing in order to create more equitable opportunities in bus fares for all citizens in RTD's area of work. I like the proposal of making local/regional fares the same price, and I like the idea of youth bus fares being free.
These prices are good. Now I don't have to ride my bike that much.
I'm glad the price is lower. Is it lower for older people too? I am older and I like senior discounts
The price is good for the regional. Too much for local
All public transit should be free. Travel is a right of the people.
I would love for my grandma as she gets older and for me to be able to ride the bus for cheaper prices especially for those in my community who need rides.
I don't take the bus but if I do I like these prices.
I think the bus should be free for people that are homeless
As someone who has been closely following the issues w/ fare structures specifically impacting our clientel (parolees), I can confidently say that the changes being proposed will have a profoundly positive impact on our community particularly for nonprofits and low income around the city. I was especially pleased to see the inclusion of the 10% bulk discount; This will help many organizations save money in the long run. I also believe that this change will make a real difference for those who have been struggling to afford transportation in the region. Overall, I want to commend the decision-makers involved for their thoughtful and forward -thinking approach to these issues. It is clear that those involved have carefully considered the needs of the community and nonprofits and I am confident that the proposed changes will be felt by many in a truly meaningful way.
I like the new price.
It should be cheaper for people with disabilities. I can't walk and I have to take the bus but I can't work so the bus is a lot.
I like the cheaper regional. I hope the drivers have change.
I like the structure but I don't understand why local isn't free everywhere. Longmont has free local buses
\$88 still to high to encourage people to leave their vehicles and use more public transportation and reduce carbon emissions
Equity, and more importantly justice, would be free transit for all. It removes barriers to access. Reduces stress and anxiety for those most impacted by not expose people to invasive application processes. Reduces overhead costs of managing upwards of 15 different fare products/structures. Increases ridership as shown by fare free August 2022. Please end fares and find funding from other sources, like highway expansion projects being implemented by CDOT.

As a long time RTD rider, this recommended fare structure is highly attractive and I hope it passes. With the delays & frequent cancelations on the A-line, the new monthly fare would make it more affordability to those moving about in the city who need to find last minute (and sometimes higher rates on busy/peak ride share) options to get around. Thank you for your consideration.
I DEPEND ON RTD AND RESPECT THEM
The recommended fare structure both simplifies the fare system and lowers fares, making it a great solution. It will help drive equity as well as higher transit use. A simpler system also will encourage more tourists and other visitors to use transit as it is not as confusing to have to try to figure out what zones they will be traveling in.
I support Title V1
Enthusiastic support for fare reductions to improve access! The current fee structure doesn't work economically, even against downtown parking costs! The new structure will make it much more accessible to commuters and those who rely on public transportation as their primary mode of transportation.
I'm not sure if this idea has been discussed, but I wanted to mention it while I had a moment. I've been a driver for 4+ years, so I have many thoughts about how things could be improved. Relating to the fares though, I think making a 1-way trip without a transfer should only cost \$1. It's not fair to charge \$3 to a passenger that's going 2 miles down the road to get home and also \$3 for a passenger that's going to ride for 40 min, switch busses and ride another half hour. It just doesn't make sense that both situations are the same fee. I hope this will be implemented.
The safety of our car and belongings at the park and ride (especially 40th) is in danger. I know many people that got their car stolen or/and broken into multiple times. Insurance doesn't even cover the damages. So we need RTD to work on making those parking spaces safe.
The train is always delayed, especially on Saturdays. After being delayed for an hour, the small train comes and half of the people that have been waiting would not even fit which makes us all late to work.
There are days I stay at the airport overnight because I miss the last train at 1 am. Most times, I would be assigned a last-minute passenger and by the time I get the passenger to their destination, clock out and make it to the train station, it is too late for me to catch the last train of the night, so I sleep in the airport for the night.
I work for a low income community in north Denver, lower fares and monthly passes would help out my resident's greatly
This is an excellent first step to making RTD fares easier to use. RTD should work toward identifying more non-fare sources of revenue, with the goal of eventually making the entire system fare-free.
Regarding the RTD LiVE Income Based Discount Program. I am pleased that this program is available as it covers a large demographic not previously available with other discount fare programs. I'm looking forward to proposed enhancements possibly coming in the future to LiVE. One feedback I would like to give is for the reloadable MyRide card for the LiVE program. This is a great option for many people that are unable to use the MyRide mobile ticketing app. either because they do not have access to a mobile phone, on-line options and do not have or cannot obtain a debit or credit card to use for payment and need to use cash. The MyRide card is a good alternative however it can only be reloaded at an RTD Sales Outlet which severely limits their ability to reload the card as there are only a few locations available to do this. Their needs to be more access available for people in the community that must use cash to reload their cards. Grocery stores or convenience stores would be a good option for these folks. Thanks for all you do with the discount fare programs.
None

Appreciate the simplicity of the new fee structure and commitment to accessibility for all riders. Well done and thank you!
This is a great step in the right direction but does not go far enough with the airport fare. If you travel with one other person it is likely to be the same price to Uber vs taking the train. The airport train should be THE way to get to and from but if it costs \$10 per person people will remain opposed to using it. The barrier to entry is barely too high. Including it in the monthly pass is a great addition, however. I do very much appreciate the combination of local and regional into a lower price. This makes it much simpler to use!
I think they're a lot of work to be done in outreach letting people know about the discounts offered. I like the idea of grocery stores, food banks and libraries having info and retail options for purchasing these passes. They should have big obvious signs talking about the discount programs and how you can buy tickets and passes there. Also the app needs a lot of work. There should be accurate location data on the busses and trains whereabouts, how early or late they are so they can provide riders with accurate ETAs. I can't rely on the busses downtown to be in time so that I can make my connection. I missed two connections today and was late to work! That's not my fault but it looks like a terrible excuse to my employer! Please address the timeliness of busses, they either arrive late or leave too early, I've experienced both situations and it's ridiculous. The operators need to stick to a strict schedule for the rider's sake!
Hi, I want to voice my support for the reduced cost of fares and passes, free fare for youths, and the expansion of the LIVE discount. I think these changes are a great start to changing car dependence in Denver and a step in the right direction for reducing greenhouse gases. This seems to be one of the first real actions I've seen that can reduce emissions and I want to applaud the proposed changes and people making it happen. I think this will increase ridership and make transit an option for more people and for families that want to use transit. Lowering fares is a great way to encourage more people to get out of their single occupant vehicles and use transit. I've used RTD buses and rail for 10 years and have seen a wide variety of people and interactions. I have never felt threatened or fearful using transit unlike the feelings I get when driving with so many aggressive, arrogant, careless motor vehicle operators. We need systemic change to dismantle car dependency and violence and this is a great step. Thanks and keep up the good work on increasing transit use and decreasing carbon emissions.
My husband and I are in our seventies and so appreciate that we are close to the light rail and buses. We don't have to pay to park and most of the places we visit are within walking distance. Thanks.
This new fare structure seems very equitable and smart. I think it will have almost only positive impacts. Thank you
As a member of a group that advocates for the unsheltered and under-served, this program would mean a lot to our clients. It would make it possible to avoid fines, keep their things, get medical help, visit shelters and food banks, and find housing and jobs. It would help to remove some of the unfair burden carried by those who suffer in poverty. Changing the fare structure to reflect equity is not only going to increase paid ridership, it is a moral responsibility to our most vulnerable.
Very much look forward to these changes! It's far too expensive for airport employees to use transit to the airport! Also, please work with the airlines to get passes offered to their employees at no-cost to the employee!

I attended the May 16th Zoom meeting, and I don't think I received a thoughtful or serious answer to my question - which was intended to be constructive. Someone else in the chat asked about the base fare being \$2.75 rather than an even \$3.00. I wanted to explore how RTD's current fare collection equipment could replicate what other systems do (MBTA, RFTA?) by printing a stored-value card that could be used on a future ride. I asked what it would take for the bus printers to print something other than transfers. The answer I received was essentially "the bus printers print three-hour passes and day passes," and "our system can't do what you're asking." My apologies for using informal terminology that people who ride your buses would use ("transfers") instead of terminology used by people who work at 1660 Blake St. The answers I received didn't seem to have received much thought from the staff member who answered. At a minimum, I would have expected a reply such as "we'd need someone from our IT department or our fare media vendor to discuss that, and unfortunately, they're not here at this meeting." Instead I got a message that "The host has removed you from the web meeting" at the end of the hour - before this and another question of mine was answered.
I never received an answer to this question during the May 16 noon webinar: Regarding other agency policies, such as Portland Tri-Met's option of a diversion by applying for the analog of RTD's LiVE program as restitution for fare evasion (that is, instead of paying a fine or performing community service - see <a href="https://trimet.org/fares/fareisfair.htm">https://trimet.org/fares/fareisfair.htm</a> ), would this possibility need to be considered as part of the Fare Equity Study or the separate Respect the Ride effort? I hope that since I wasn't able to get an answer during the webinar that this topic can be covered in the study's final recommendations.
Needs to be more affordable
I work as the homeless student liaison at a charter school. I was very excited to see a No-cost transit for youth ages 19 and under. This will help so many students - low income and homeless. Transportation to school is one of the barriers so many homeless students experience. By providing transportation, RTD has increased students' ability to achieve their and their family's goal of graduating. Thank you!
Currently Access-A-Ride customers may ride regular services for free. Will this continue?
I would like to advocate that McKinney-Vento Homeless students and families be categorically exempt from income verification for the LiVE program and that school districts be allowed to be an organizational partner where we can purchase bulk LiVE passes for this specific population. PEAK is a barrier for our students and families. Please make LiVE passes available for purchase just like Local 10 Ride Ticket Books. Thank you!
Gracias por apoyar a la comunidad esperamos que estas tarifas sean accesibles para los menos afortunados
Gracias por tomar en cuenta la opinión de la comunidad que esta palpando la necesidad
I LOVE the idea of making RTD free for youth. Adolescents are seeking independence and need access to mobility in order to transition into adulthood. Making this fare free would increase access to school choice, promote access to after-school activities, and give teens the independence they are craving and need to develop a healthy sense of self-sufficiency and self-agency.
This comment is unrelated to the changes to fares, etc. But this issue is much more important than any of that. I used to be a daily rider of RTD. Due to increasing crime, mostly damage to cars at the park-n-rides & the transients at Union Station, I (and my family) no longer use RTD. I used to be a big proponent of RTD, defending the funding, tax increases, etc. I will no longer support RTD until you take the crime problem seriously, and work with police to apprehend and convict all criminal activity surrounding RTD properties.
I encourage you to adopt the new fare structure, especially the recommended discount fare structure for people over 65, Medicare recipients and those with disabilities. It will make a huge impact in their



lives, since they tend to be of limited income and more dependent upon public transportation than others.
How would new fare structure affect Access-a-ride when I have to plan to tell Access-a-ride I need to be at my dr appointments at least an hour and a half before my actual appt so I am not late. Will Access-a-ride passengers be given a day trip for as many trips as they can make for that day fee.
All fares should be free for people over 70 years old.
LOVE! The new fare structure, It is a huge improvement. I am hoping we can continue to adjust the price to drive increased ridership! Also hoping soon we can support nfc on iphones through apple transit passes, would increase my ridership!
I believe the proposed plan would be good. It would make it easier and more affordable and by being a disabled vet it would help out.
I feel that youth should have free fares in order to attend school
All of these are a good idea.
I am so very excited about the new fare structure. I will definitely be riding the train and bus more often once it is live. I absolutely think that the three pairs for all you should be extended beyond the one-year pilot program. We need long-term investment in our youth and public transit. It is also kind of strange to have bus fares be \$1.35 because people don't often have coins anymore. They should definitely be rounded to the nearest whole dollar.
When I travel a single person I will take the bus/light rail to the airport. When it's 2 or more of us traveling to airport it is cheaper to pay for parking at DIA vs round trip rail (\$40 for 2 ppl) \$30 for parking.
Getting around with the bus is a really fun experience and this free for June thing for buses will really help when I get to work and school
I think that we should have better bus stops and make bus stops easier to be at because having to stand in the rain trying to get to school
These changes are ESSENTIAL for the people of Denver in providing public transportation for all! As a bus rider myself the monthly pass decrease would be a game changer for me and allow me to access more places that I otherwise wouldn't be able to.
Location of transit is not convenient. Makes many last mile problems
We appreciate the current 70% discount off of full fares that youth currently receive. We purchase 10-pack ticket books for our kids to use when they ride the bus. However, sometimes they don't anticipate needing to get home on their own and forget to bring their tickets when they are out. Having a zero-fare program for youth would allow my kids to access public transportation whenever they need it, rather than rely on a parent to pick them up in a car.
I'm an infrequent rider and will benefit hugely from these changes. Currently the monthly fare is inaccessible to me and the new one would be affordable.
Can you please work with DIA to provide a discount for airport employees? The a.m. trains are FULL of us & even with this proposed reduction, this is still a lot of \$. I wanted to take the train daily to help the environment, but it's unfortunately cheaper for me to drive. Thank you!
I would be pleased if the monthly regional pass was reduced to 88\$. One low price, one time purchase would make my life convenient. I know several who would take the train to DIA but complain that the price is too high. I think ridership would increase with the new airport fare. Thanks!
I'm very excited to see this simplified fare structure. Living in a local zone along a regional route, I have previously been dinged by that change in fare. We need simplicity in our system to better encourage more transit users. I'm also pleased to see more consistency amongst the discount fares as

well as incentives for young riders. Thank you for these efforts in making RTD fares more straightforward
The cheaper regional fare is the best part.
It should be free for homeless people or people with no money. I also hope you don't cut the routes.
I like that the regional and local day pass is less because I have to go to Longmont to work.
I hope you all still make money. It's nice that you're giving us a break.
Glad it is going to cost less money. My issue is the drivers kick me off if I don't have exact change. I think the \$2.75 will make the same problem for me and lots of others.
The bus should be free for local rides
I like the cheaper local fare but I hope the drivers will have change so they don't take an extra quarter when I ride the bus.
I like these new fares because the monthly fare is less.
I'm writing to share my excitement and concerns about the proposed changes to the RTD fare and pass structure. I'm happy RTD is simplifying the structure and reducing the cost for all riders but especially frequent riders through the monthly pass. I'm also excited to see the free fares for youth pilot program, and consolidation of the discount programs into one. I'm concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. Additionally, see the success of the free fare programming both here in Denver/August, and in other cities. I'm a firm advocate of making RTD fares completely free. It reflects the accurate value system of our community members who rely most on these services, greener/cleaner/lower congestion on our streets, and eliminates ALL of the cost and accountability of collecting fares at all. Imagine how streamlined a system we could have if drivers were not at all concerned about collecting fares, we didn't have to have officers screening for non-payment and risk unhealthy encounters, no systems or procedures would need to be in place, screened, trained, reviewed, reciprocated in accountability, etc. It would simply save more money than it brings in to charge \$0 for all transit. I urge you to adopt these changes, implement them as soon as possible, and keep pushing for state funding to further improve the fare and pass structure toward affordability and equity to make our transit system accessible for all. Thank you.
The fare structure looks more affordable and should allow more people to be able to access the rtd services
I think it makes sense to not have a higher fee for those in lower cost of living areas (generally further out) so mass transit is used more. I'm not sure I would lower the local fare though. Why not just leave it the same? \$3 (for 3 hrs) & \$6 (for day) to have a slightly lower tax burden & "even" \$ amounts. Otherwise I like the ideas. Thanks!
Agree only if this change won't affect the quality of the service. Right now is good. Keep it that way
I think that the new recommended fares are a great improvement. I have been using the RTD college pass for a couple of years, but now that I'm graduating and losing access to that I have been trying to figure out how to make my commute. The current monthly pass is far too expensive to justify purchase for me but at a price point of \$88 it's far more reasonable and I would be more than likely to continue to utilize RTD services for commutes. Thank you for taking the time to do this study and for the potential of making RTD affordable for everyone! Best regards, Taylor Mundt



The Fee structure is still outrageous. I've been to dozens of other countries around the world and these fares are laughable. If we want to move to mass transit, the costs need to be lower. Period. Wake up.
The new fee structure appears more affordable for those groups of riders who actually depend on public transportation. I especially believe that the reduce cost for regional and airport fares will benefit the metro area as a whole with regard to reduced traffic and air pollution.
Riders 65 or older should ride free. They've paid RTD taxes for decades. Gets them off the road and decarbonized too. Children should pay something. Teaches them that transportation costs \$\$\$ and isn't free. They learn the sting of paying taxes for RTD services. RTD must first ensure a safe, clean, vagrant free riding experience before customers will return. RTD light rail is a fixed guideway system designed to move passengers toward the center city. This is now an obsolete concept. Neighborhood circulator buses should be stationed at each light rail stop to better service the local neighborhoods rather than the central city. A once to twice per hour express light rail train should service the downtown. This will require dispatching capabilities far above what RTD currently has. RTD management needs reengineered. Far too many chiefs with far too few Indians, especially beat cops. 18 RTD Board members is ridiculous.
Please clean up your bus stop trash. Lafayette at Lucerne and Hwy 287 is piling up and blowing trash all over Lafayette. Bad environmental impact by RTD.
I support the new fare structure. I would also support having someone check fares. I think those of us that pay them are subsidizing a lot of riders who don't.
Why is the CEO salary so high?
I would like to see a monthly pass available to LiVE participants. Being on SNAP and unemployed I am constantly on the bus all over the district for interviews and job searches.
I'm reviewing the new fare schedule there is no option for veteran discounts. As a disabled veteran who requires the RTD A and R lines to make appointments at the hospital etc. I have to prove disability. This is fine however I choose not to file for state disability, my injuries are a result of federal service and only use Veterans Affairs for medical and disability. Currently RTD requires state disability forms for disability discounts. My choice to "save money in the state pot" for others to use automatically puts me in tougher financial positions and I receive no disability assistance on Bus/Rail options. I have on numerous occasions, going back to 2020, been harassed by RTD security staff because "I don't look disabled." My apologies RTD that disabilities are not appearance based as the Americans with disabilities act would agree. RTD's managerial incompetency is being taken out on paying customers, shocking RTD can't seem to make the correlation from their actions and policies and the drop in ridership. This includes employee conduct. Just a former new flyer transit operator from Virginia with 3 years of observation now on RTD and well, I still wait for the ability to applaud RTD for doing something correct, observations and easily heard comments from riders show that Denver will not have reliable public transportation anytime this decade at the current pace and with the leadership in place. Union Station (train areas) also appalling. The urine rich aroma of public transportation in Paris, is still far cleaner than the RTD and it's well known those aren't water puddles. RTD is the problem, public transport is meant to be a solution, perhaps new leadership with European and or real world experience is necessary. With road rage accidents on the rise, this is the time to shine for public transport, not continue to circle the drain down the toilet. Hopefully RTD can make positive changes, in less than 10+ years, my optimism remains low.
Please continue the EcoPass program. It has pushed me to use RTD more consistently and to get more cars off the road. It is a great program for companies/organizations that buy into it. I am a BVSD employee and get the EcoPass through BVSD. I love it and wish it was also available for my family. The new fare structures look reasonable (especially the free youth option), but the EcoPass needs to continue as well. Thank you.

I live within a very short walk to 10th & Osage and work a very short walk from Orchard. I chose this job and house due to proximity to RTD. I never take it though as I feel uneasy at the 10th & Osage station with all the vagrants hanging by the grassy slope. And the zone fare is just too expensive to justify. Yes we can afford it, but there comes a point where it just doesn't make sense. There should be a charge, just not so cost prohibitive for those who do not get subsidized. But enough of a cost to keep the vagrants from taking up all the space. Also need to step up security. Drugs are out of hand. Another huge disappointment is the RTD after a Fiddlers Green event. We gave up on that year's ago. Always worried that we wouldn't fit on the one last train that runs when the show lets out. And way too long of a wait time to catch that last train. They should be a few trains ready to go when big events let out. I hope you can get us back as customers, we've been so disappointed by the whole system...
Kids zero fair would allow more to ride it. I can't afford it with the kids and myself
Love the new structure! Feels much simpler for first time or out-of-town users.
Simplify the tickets by allowing/limiting rides by time-of-use, not Regions crossed. Riders taking the D train from Littleton-Mineral have a total of ONE stop that's in their "Local" region. Riders taking the W train, from JeffCo Govt's Cntr-Golden have ZERO stops in their "Local" region. Riders taking the E and R trains, from RidgeGate Pkwy, in contrast, have NUMEROUS stops, before hitting a new region. This makes no sense and financially burdens/punishes riders, based on where they live.
Fare should be free and frequent. RTD is a PUBLIC SERVICE that should be fully funded through taxes and grants. I moved into a house because of its proximity to the light rail six years ago and took the light rail downtown. Then the (already more expensive than driving) price went up, then trek of the three stops I used got cut and frequency decreased, then the price went up again, then violent policing increased (of POC and of queer people like myself), then the frequency decreased again, and now I drive downtown every day, sometimes multiple times a day, because I can't afford to burn time or money trying and won't risk state sponsored harassment to support a public services that has done everything it can to convince the public not to use it. I'm hoping the Lynx BRT will help with reliability but if it costs \$6-\$19 (not sure which fare level it will be for that distance) for me to take it to my favorite brewery in Aurora, I'll just keep taking a car.
In the last years Arapahoe Ridge HS have been supporting our student with RTD bus passes in order for our students to come to school and to go to work. RTD can support our students and facilitate them with their most important need which happens to be transportation. Lack of transportation is the biggest reason for missing attendance, by helping the students with RTD tickets, we can reduce this problem by 90%. Most of our students come from families that are going through financial hardship that cannot afford transportation. By helping them with this, they can now go to school and start their path to success.
My school has been working under a grant for the past two years to provide bussing for students to attend ARHS. We also offer credit to students for working in the community. What we have found is that students do not have transportation to and from work. FREE to STUDENTS is an excellent way to support the working class of Boulder. 70% of my school is free and reduced lunch. The families support education but don't have the means to get their students to school. This proposal would be a DREAM COME TRUE for families of poverty in Boulder County.
After reviewing the recommended fare structure, I am in favor. As an infrequent rider, I was frequently confused as to which fare I needed to purchase. Combining local and regional makes sense. I appreciate the lower fee structure. Price to ride was not an issue for me; however, I'm sure that will be welcome by transit reliant/financially burdened customers. I'm wondering how this will be subsidized.

<p>1) I really want to ride and support public transportation but the price and time to drive is still much better. The price is going to have to lower much more than 25 cents to get my family on public more often. 2) Would it be possible to up the amount of hour for a pass from 3 to 4? That would also get me on public more often and make it possible to use just one ticket to go to an event for example. 3) Or how about a bigger discount than 10% for 10 pack tickets? 4) I have a gap year program with numerous young people that use RTD. They all usually take the same bus but they all can't ride their bikes b/c only two bikes fit on the rack and can't be brought on bus. This really limits us!</p>
<p>We deem that this initiative would be undoubtedly equitable for students in our district, specifically those undergoing housing challenges, who are qualified to receive McKinney Vento Services. This school year we've had our highest number ever of unhoused families at BVSD.  <a href="https://boulderreportinglab.org/2023/04/25/homelessness-in-boulder-valley-school-district-hits-highest-level-since-great-recession/">https://boulderreportinglab.org/2023/04/25/homelessness-in-boulder-valley-school-district-hits-highest-level-since-great-recession/</a></p>
<p>I'm writing to share my excitement about the proposed changes to the RTD fare and pass structure. I'm particularly happy that RTD is simplifying the structure and creating significant cost savings for the most frequent users of the system through the changes to the monthly pass. I believe the lower monthly pass price will also induce more ridership, as they cost/value tradeoff significantly improves for the monthly passes. I urge you to adopt these changes, implement them as soon as possible, and keep pushing for state funding to help improve reliability and frequency of our service. Thank you, Jonathan</p>
<p>Free fares for those under 19 is a great step toward improving attendance for public school students. Transportation cost should not be a barrier for accessing a free, appropriate, public education.</p>
<p>I live on a light rail stop and never use it because it is too expensive. I used it once this year and the train I planned to take home was cancelled, so I had to call a ride share car. I also used to work near another lightrail stop on the other end of the city three days a week. It still was too expensive and didn't make sense to use. The stop I live on is also in a different zone and so, last I checked, it is more expensive to use the one here than to drive a short distance to another one that is just as far south. I use it less than once a year.</p>
<p>I love that 19 and younger are free. I think the fare structure should be \$3, \$6, and \$90.</p>
<p>Way to go RTD on the proposal to make fares reasonably priced for all, create a program for all youth under 19 to hop on transit, and making the LIVE monthly program more affordable and less cumbersome. As a city planner and lover/supporter of transit, my main question is how RTD will sustain funding for the fare cost reductions...with the assumption that more people will ride?</p>
<p>This is an excellent idea to create a more accessible, inclusive public transit system in Denver, specifically for those who require it for daily commuting. Personally, this would encourage me to use it more and also make it more feasible to get to the airport.</p>
<p>I agree with the proposed changes. This would simplify my life and make the community more accessible to all parties.</p>
<p>I was very happy to see RTD proposing a reduction in fare prices. When I moved to the metro area, I was eager to make more use of public transit for convenience, savings, and the environment. But I was shocked to see the high prices of both rail *and* bus services. How is RTD meant to encourage public transit use and the reduction of smog and congestion when it is *cheaper* to drive, even with the summer's high gas prices? My 20 mile round-trip commute costs around \$3-3.50 in gas; even with the added cost of insurance and car maintenance, it seems to barely match the \$6 round-trip bus fare, which is significantly less convenient. I have lived in metro areas where bus transit is significantly cheaper than RTD or even free. I am glad for RTD's lower fares, and hope they will be further lowered. I also would like to see greater transparency in why the fares are so high compared to other metro areas—or if in fact this is not the case.</p>

I'm so glad to hear that the access for Youth will improve. Too many times growing up in Houston I was unable to participate in educational, volunteer or work opportunities. Our youth, especially our economically disadvantaged youth, deserve access and I'm so proud to live in a state, and city that cares.
\$3.00 is expensive compared to other cities across the US. I suggest if we keep the \$3.00, make that a full day pass so riders can complete a number of errands rather than just have the 3 hour window.
I support new reduced rates (which are still higher than pre-COVID fares). Transit in the metro area is expensive.
I agree to lower the RTD fare for all people in this community.
Look forward to lower fares
Make fares cheaper and more affordable for all! And a place to call security or cops from unruly people in the bus
RTD should be free. The current price is ridiculous and unfair for the people that rely on it for daily transportation. The city should spend less resources for car infrastructure and put more into public transportation and infrastructure.
I really like the proposed changes! I especially like the Zero Fare for Youth program and the lower monthly pass cost.
I am very pleased with RTD's new fare structure, especially the lower fares for monthly passes, simplified discount categories, and free fares for younger people. I would like to see RTD work actively to secure funds from the state.
I appreciate the simplified fare structure and lower fares. Nice job! I hope your efforts will get a few more people out of their cars.
\$1.00 should be the fare for all rides.
I think the Airport fee should be lower so that a family can take the train for cheaper than paying to park at the airport.
I fully support the new changes in recommended fare structure and how it would greatly benefit lower income, disabled, marginalized, and unhoused populations that lack access to transportation. This would particularly allow the people we serve in our organization easier access to resources such as appointments, food banks, work, etc. that are so crucial to supporting them in the community.
Most times I ride the AB bus to and from DIA there are no enough seats for all the passengers. People stand for 40 minutes while on a bus going over 60 mph on a highway. This is so unsafe. Why does rtd not run enough busses on this route? Why are you endangering your riders because you don't want to add busses?
I'm writing to share my excitement and concerns about the proposed changes to the RTD fare and pass structure. I'm happy RTD is simplifying the structure and reducing the cost for all riders but especially frequent riders through the monthly pass. I'm also excited to see the free fares for youth pilot program, and consolidation of the discount programs into one. I'm concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. Seeing affordable, robust transit that is offered in other cities gives me hope that the Denver area can develop a solid model. I urge you to adopt these changes, implement them as soon as possible, and keep pushing for state funding to further improve the fare and pass structure toward affordability and equity to make our transit system accessible for all. Thank you. -Bret

Not enough money to pay daily
At 40th and Colorado station, put gate in between ends on eastbound side.
Nice buses - keep up improving
Too high fare
RTD is really doing an excellent commute all level and nationality of population. Kudos. The train to the airport DIA, great job! Keep it going!
I like the new fare structure. Lower prices should help get more riders, and it is definitely a good idea to lower the cost of the monthly pass.
I'm thrilled to see the \$88 monthly pass fee for the Regional routes and the streamlining of the pricing structure. I ride RTD frequently and even I'm confused about how the current fare structure works. I never know when I get on the buses headed out of Denver if I'm going to be paying \$3 or \$5.25.
Since "troublemakers" and the homeless are now allowed to ride free (drivers tell me they're not supposed to confront anyone or refuse them a seat), upstanding citizens should have the fare waived as well.
The one thing I see missing is an annual fare . Businesses can pay as little as \$350/yr for a commuter pass, but individuals it's closer to \$3k. It will be better if you buy 12 monthly passes at \$88/mo, but what about just having an annual pass with a discount? It would save in monthly administrative costs and benefit riders whose companies don't purchase passes.
Free fare. You have tried everything else and it doesn't work Take a look at Luxembourg with their free fares. Their public transportation is packed. And I would suggest a gasoline tax to pay for it. /PC
Dear Madam/Sir, We're happy RTD is simplifying the fare structure and reducing the cost for all riders but especially frequent riders through the monthly pass. We're also pleased to see the free fares for youth pilot program, and consolidation of the discount programs into one. We're concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. We urge you to adopt these changes, implement them as soon as possible, and keep pushing for state funding to further improve the fare and pass structure toward affordability and equity to make our transit system accessible for all. Thank you. Elizabeta Stacishin Indivisible Ambassadors
I travel to ATL frequently and it's shocking that rail fare to/from DEN is \$10.50, while rail fare to/from ATL is \$2.50. Even slashing our rail fare in half would keep us on the more expensive side. Please decrease rail fare costs!
I'm writing to share my excitement and concerns about the proposed changes to the RTD fare and pass structure. I'm happy RTD is simplifying the structure and reducing the cost for all riders but especially frequent riders through the monthly pass. I'm also excited to see the free fares for youth pilot program, and consolidation of the discount programs into one. I'm concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. I frequently use the bus to get to work when I am unable to bike due to weather, and I am



glad to see that RTD is taking the time to hear the public on what can be improved. I also enjoy taking my kid on the bus to museums, events, etc., but it can be an added complication when I need to figure out the cost, exact change, etc. (I use the mobile app, but my kid doesn't have one). We would definitely use the bus and train more to explore the city and get to and from the airport with free fares for youth. I urge you to adopt these changes, implement them as soon as possible, and keep pushing for state funding to further improve the fare and pass structure toward affordability and equity to make our transit system accessible for all. Thank you, Leila Regan-Porter

Hello there! I wanted to express my feelings about the proposed changes to the RTD fare and pass structure. I am delighted that RTD is planning to simplify the structure and reduce costs for all riders, with a special focus on frequent riders who can benefit from the monthly pass. Additionally, I am excited about the upcoming free fares for youth pilot program and the consolidation of the discount programs into one. I'm concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. I'd love to know if RTD studied moving the 3-hour fare to \$2 and if not, encourage you to do so. It's an exact change and could drive ridership up. The lower the barrier to riding for cash customers, the better. Having 10 people paying \$2.75, is one thing. Getting 30-35 at \$2.00 would be a major win money-wise. Busses are running regardless, why not make sure they're always more than half full? Not to mention, the lack of giving change, really means the fare is \$3 for cash customers. I urge you to adopt these changes, implement them as soon as possible, and keep pushing for state funding to further improve the fare and pass structure toward affordability and equity to make our transit system accessible for all. Thank you

Greetings RTD Team ~ I'm writing to share my comments about the proposed changes to the RTD fare and pass structure. I'm VERY grateful RTD is simplifying the structure and reducing the cost for all riders (especially those that depend on RTD as their primary form of transportation). I really like seeing the free fares for youth pilot program, and consolidation of the discount programs into one. I would; however, love to see the 3-hour passes be \$2 even (instead of \$2.75). I have taken numerous transit/bus routes where the fee was only \$2. This makes everything easier, smoother, and less stressful - on drivers, on riders, on those who one any number of edges financially - running late - in challenging weather. I am grateful for the work around providing grants/discounts for community serving organizations. I would recommend that this is as easy as possible for said organizations/leaders. I would also recommend that there are perks/incentives for these leaders to educate, connect, and promote transit ridership. In addition to making permanent free fares for youth, I would love to see more advocacy from RTD - publicly and politically - around safe and accessible ACCESS to bus stops/stations. I would also love to see creative fundraising schemes/programs to invite community to help privately fund (or partially/privately fund) bus stop shelters - with local artists, ADA codes, and support from RTD and city/county agencies. These changes would make our transit system truly accessible and affordable. As a full-time pedestrian and transit user, we need our system to radically CENTER access/dignity for those who depend on these systems the most, programs/organizing around climate action responsibility and transit, and community partners/agencies who can help expand funding, increase ridership, and shift harmful/false stigmas around transit. In gratitude, Jonathon

Lowering the fares will be SUPER helpful in convincing (new) folks to take public transit, as well as helping those who already struggle to afford it. I don't have a car and have relied on RTD since I moved to Denver in 2018, and I am thrilled to see these changes and updates. I am a graduate student at the University of Denver, and I love the student pass I receive through DU's bulk policy with RTD. As an aside, the #1 change that would improve the overall quality of taking RTD is *frequency* of buses. I know this is dependent on employing more drivers, but it would DRASTICALLY improve the ease of taking transit. Thank you!
I make decent money and recently purchased a condo in Denver. I'm doing okay. Public transit here isn't affordable. For a family of 4 to go to the airport and back is \$80. I can park and drive and feel very safe for LESS! The bus to Boulder, more expensive than driving unless you are a student. You need to general middle class to use the transit to subsidize all the other people using it but it's not a deal. It sometime MORE than driving. There is NO motivator to use the public transit besides traveling to the airport solo. I don't use it any other time because it is not affordable. If it was \$3 per person I would exclusively use it to go to and from the airport. A dollar saved is a dollar made. I'm over paying a lot for a poor service. Make it a fair affordable price and we will come use it all the time. Until then, I'll be driving and parking.
We work with arts workers all over the metro area who use buses and light rail as well as those who wish they could use it but currently can't. Schedules don't go as late as they could, service is unreliable and currently unsafe on multiple routes, and prices, especially to the airport, have been cost prohibitive given the available routes and timed schedules. A more integrated system that benefits performing arts workers that work long hours in the night and in multiple areas is paramount for this group to be regular RTD riders.
we should make all fares minimal to encourage the public to use ALL available forms of public transit. The only way to get cars off the roads - and provide transportation alternatives is to have a lot of frequent options. This means smaller vehicles (i.e. 15 passenger vans) and more frequent stops throughout towns and cities. Large Empty Buses are a waste of taxpayer resources. Side Note - when is the commuter rail coming to Boulder? We have waited a decade with no progress. Time for Eminent Domain - or a major investment - or return our money!
Make sure to have markedly lower fares for low income/elderly/disabled, thank you!
I think the fare structure should be changed. It is almost as expensive as owning a car for the current daily rider.
I think this is an excellent idea that will get more people to use the bus and increase revenue through volume.
Public transit should be viewed as part of infrastructure like roads and city parks and should be heavily subsidized for everyone. Rich people will still drive their Mercedes to work, don't worry. You want people to use it and not have to keep expanding highways - then stop spending money on highways and put it into public transit subsidies. Look at countries where it's done successfully. Asking people to show they are poor enough to get a discount and to track all that will require so much work that it won't be worth it. Stop trying to make it fair, make it WORK. Make people love it and depend on it - and then people will be willing to pay more for the convenience.
Follow CTA -Chicago Transit Authority's pricing model!
I think the fare needs to be cheaper than it is to park downtown. We almost rode today but it would have cost my husband and me \$6 each, totaling \$12. On SpotHero, I found parking for \$10. We chose to drive instead since it was cheaper. Also, some of the RTD light rail lots require you to pay to park. All parking should be free since we're paying to use the light rail. In sum, it's often cheaper for the 2 of us to park downtown than it is to use public transportation.

I ride the bus in Seattle as a senior citizen. The reduced fare is \$1 each trip including the express bus to the airport. If you really want ridership among the elderly, the fee of \$1 should be effect for us. In addition, the flex rides should be available late nights and on the weekends as well. It is too expensive for UBR from the airport. Also, I ride the AT bus to Arapahoe. When my flight is later than 11:17 PM, the bus does not go to Arapahoe station. It is a 5 mile walk, so I sleep at the airport until the 6:17AM bus. Thanks this forum to discuss fare and improvements.
As a student, this would be super helpful to me and other students who struggle with other transportation!
Current Price too high. Proposed one looks great Dirty seats. Please replace
This fare structure is such a huge step in the right direction. Much simpler, and more in line with the cost of transit in other comparable cities. (Public transit should be free, though). I'm hoping there's a way to do some kind of pay as you go for a monthly pass, so riders who don't have the \$ upfront for a pass don't end up paying more than those of us with more liquidity.
Love it!!!! Finally, it will cost me less to ride the train from Broadway to Lone Tree than to drive to work!!!! Thank you!!!! I love the light rail. And the airport fare is still reasonable. Also given the dangers with speed and what happened on the golden line, I recommend using cameras and speed monitors so engineers will be watched and not be permitted to travel at excessive speeds. The cost of Monitoring public safety on transit, a basic obligation of RTD, will more than cover the expense the city will incur as a result of the recent unfortunate accident, increase public trust, protect riders, and increase ridership.
I live in North Denver and go to the Tech Center. Here are reasons why I don't: 1) Union Station is full of bums! Why on earth would I want to pass thru? 2) The light rail is SLOW. I can get by car just as fast even in heavy rush hour traffic. 3) The fare isn't worth it if I had to do this weekly. You're asking me to pay \$200 a month when it costs the same in gas for a compact car? 4) Very few creature comforts, food/drink services along line. I would love to use mass transit, but it makes no economic sense, hard to use and feels unsafe.
free fare for people 19 and under
Make all public transportation free.
I think It would benefit the public, and it would be awesome for the environment
Absolutely love the lower fare idea! RTD is solid for what it does and staff are always friendly!
Make public transit free for all.
I pay 200 a month for transportation to and from work and it gets expensive in the months I don't use it to it's full capacity
One of the reasons I don't often use the light rail when I can is because of the outrageous prices. It's handy to jump on a train to Park Meadows but cheaper to drive when traveling with a family of 4. It's well over \$30 bucks round trip for all of us. It is senseless to have such high fares per person- it's a deterrent to riding RTD. If your goal is to make money it shouldn't be off the limited people who will ride. Lower the prices to affordable prices, that makes it cheaper than driving a car, and more people will take advantage of it, hence RTD will bring in more money. The light rail to the airport is ridiculous. We want to take it but for a family of 4 it is \$80 round trip. No we'll just get a ride to and from. Also get some security on each lightrail/ bus. They're are people who harass and bully others on the bus. It isn't safe.
I realize you are in a "catch 22", but you have increased fares and decreased service. If you had service that ran more often I would be more inclined to take the bus. The senior discount is good for me, as I am a senior. Riding light rail is confusing because of the fair scale for longer trips, because I am not sure what zone I'm in when I get on or off.
Please lower the cost!



Totally agree with Free Youth fares!
I'm very onboard with these changes, but would like to see further reduction in the regular fare as well. RTD is one of the most expensive transit in the country, and it affects ridership. For example, we went to a Rockies game with family and friends the other day, and we would have loved to take the bus. But it was the same price for four adults to drive and park downtown as it would have been for us to take the bus. That seems backwards.
Please make the A Line route to the airport either free or significantly more affordable. Incent people to use it rather than it being an easier/cheaper option to drive and park at one of the outer lots or take a taxi or rideshare. It's \$40 for two people to take a round trip A Line ride to the airport, that's likely why it's underutilized.
The most important thing for the success of the system is high numbers of riders which can only be achieved through frequent service along routes connecting areas of interest. Please do not reduce fees too much or move to a free fare model which would undermine the ability of the system to operate with enough service to make it a viable alternative to driving.
I visited Seattle and their senior fare for either light rail or bus is \$1, period, no matter how long your trip.
Public transit should be free.
I agree with under 19 ride free. Provide the next generation with a love for mass/community transit. I agree with expanding employer sponsored passes. This is the best way to do ridership outreach for commuters. Give a tax incentive for the businesses. Time based passes were a welcome change. Enable NFC pass scanning for phones. Create a family pass for getting to the airport. Simple flat rate for groups traveling to/from the airport. It has to be less expensive than driving plus the cheapest parking option at the airport.
I am writing to express my support for the proposed fare structure as recommended by the RTD Fare Study. The new fare structure is much simpler to understand for riders and will offer some incredibly good value journeys on RTD such as Denver to Boulder. In addition, the proposed \$88 monthly fare cap / pass will offer anybody who uses RTD multiple times a week a great deal, including those who work at Denver Airport. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps / passes and airport fares for low income riders, seniors, Medicare recipients and riders with disabilities. Lastly, I support the trial of free youth fares, which will be a huge benefit to the districts' high school students.
It would be good to explain more how this fare structure would work for families. I initially was thinking it would cost \$50 to bring a family of 5 to the airport on the A line which isn't competitive with driving or Lyft/Uber. However, after spending some time reading the policies and programs section it sounds like children under 5 ride free and other ages receive a substantial discount. This was news to me. Advertising these price reductions for children would be good as my family and other families I've talked with in the metro area weren't aware of them and thus didn't consider RTD as a serious option for getting around. Overall, I think the fare structure is a huge improvement over the previous one. It greatly simplifies fare calculus and bringing the monthly pass under \$100 while including the airport is quite attractive.
I would like the bus fare to be free for all people under 19 because it would help me get to and from school without worrying if I need money for the bus.
Something that I've never heard discussed is incentivizing loyal RTD customers. Reward those who take RTD regularly, offer promotional pricing for NEW customers that sign up, give free passes for out-of-town family & guests. The goal is to get people out of their cars and lowering the cost of a ride by a quarter doesn't do that. Allow people to earn points to get a free monthly pass. Those savings could mean a lot to people.

What is the specific pricing structure for EcoPasses and neighborhood EcoPasses? I can't find the actual pricing on the fare equity study website.
Make fares free for youths
Having free bus passes monthly for students in Denver public schools as well as for Auraria campus students would be extremely beneficial and help make transportation as well as education more equitable.
I'm very much in favor of free fares for people 19 and under. I work at North High School and Skinner Middle School Especially at North, MANY of our students ride the bus to school each day. We offer discounted bus passes, but free rides would make a huge difference to our students. I also think that knowing the bus is always free would encourage young people to use RTD much more often.
Greetings: As a representative of the largest advocacy organization of the blind in Colorado, I want to say at the outset that the manner in which the recommended fare structure is being presented is incredibly difficult to read because of the numerous links that a person must activate in order to glean any useful information. We understand the recommendation would eliminate regional fares over-all, both for full-fare and discount-fare customers. But saying that fares would be reduced by a certain amount without indicating the final fare under the new structure makes it harder for the reader to understand what is happening. Why not just say (for example) that for full-fare customers, the regular fare would be reduced from \$3 to \$2.75 and that for discount customers, the fare would be reduced from \$1.50 to \$1.35. If, in fact, you have a single page which lays all of this out, I would be happy to receive a file which we could share with our blind members, friends, and colleagues. Cordially, Curtis Chong National Federation of the Blind of Colorado
As a middle school social worker in DPS, I am writing in STRONG support of the Youth fare proposal for free transit pass for all youth 19 and under. Our high school students have historically been able to access free bus passes in order to utilize RTD for transport to and from school and activities. We have many middle school students, especially those with truancy issues, who's parents have unreliable or no formal transportation of their own who are missing out on their education due to accessibility due to lack of transportation and/or hardship financial impact on family even with reduced youth fare. Having this RTD pass available to middle schoolers will provide the benefit of allowing students to have agency in getting themselves to school without relying on an adult and to gain skills in RTD ridership for their use in the future as a Denver resident. Please approve this option as a means to increase equity for all students to be able to get themselves to and from school and their outside activities that builds protective factors for youth.
I like the new proposed plan and would ride far more often with that fare structure for a monthly pass.
I support the reduced fare proposal. I pay the monthly full fare every month as I commute from Westminster to Downtown using the FF1 bus and the proposed reduced fares would have a huge positive impact on my family's budget.
I'm very excited for this updated fare structure. For me personally, it never made sense financially to take public transit to my destinations due to the high cost. Now with these reductions, it's going to take me out of my car more often than not in the future. I do have a concern on the standard 3-hour and daily rates. Because they are not even dollars, I do think it'll make things difficult to those who must pay with cash and if drivers don't carry change, it'll mean they are spending more to ride. I hope you can find a reasonable solution to this, either by reducing the price or including some kind of transit ticket where you can load cash into.
Ok
Due to the fact that Denver Public Schools does not provide school bus transportation for students, it is critical that the Zero Fare for students under the age of 19. Please also consider route changes to transport students to school efficiently.

I work at the hospital and my husband at the airport... I think hospital employees and airport employees should get some type of discount on monthly passes.
STOP shifting the burden of payment to others. To be equitable, everyone (regardless of color, creed, etc.) should pay the same amount. RTD cannot afford to lower rates, especially when they need to ENFORCE policy by stopping the non-paying riders. More-&-more I don't feel safe on RTD, and that will cause more of us to STOP riding. Reduced fares, "equity" programs, and lack of enforcement in trains will continue to make RTD go down-hill and lose customers.
Are you, or can you, bring back discounted coupon booklets?! I see a problem with feeding in three dollar bills and expecting to get back 30 cents in change. And the ticket kiosks where I ride from (Southmoor) has had one out-of-service since before Covid. I would much rather buy a ticket booklet and not have to deal with either the kiosk or with change.
I'm writing to share my excitement and concerns about the proposed changes to the RTD fare and pass structure. I'm happy RTD is simplifying the structure and reducing the cost for all riders but especially frequent riders through the monthly pass. I'm also excited to see the free fares for youth pilot program, and consolidation of the discount programs into one. I'm concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes.
Fares should be less if I only need 1 ride down the road I spend \$6 a day for 1 bus 2 ways
I am delighted that you are lowering fares. This is such a positive step to increase ridership. I admit I was not well-versed in the equity issues involved, but am happy that this is being addressed/publicized as well.
I support removing the regional fare and making the monthly pass much cheaper! Great work on this!
The airport fare is very expensive. \$10+ per ticket is excessive. Especially, if you are only 2 stops away from the airport. The airport train cost should be based on where you are going verse a flat rate...like the other lines. Also, the bus from Union Station to Boulder is amazing. Could there be a future train instead of the bus?
The buses need to be more clean there are some that are dirty
I think that the new lower fare for everyone and the one price local/regional are going to boost usage. The zero fare for under 19 is going to bring rtd so much more business year round. This'll help create jobs and make less emissions/smaller carbon footprint and working towards climate justice. I also like the increased discount for LiVE Income-Based Fare Discount participants.
They should give more discount on the 1 month ticket a lot of people can't afford to pay so much money at once
I am writing to express my support for the proposed fare structure as recommended by the RTD Fare Study. The new fare structure is much simpler to understand for riders and will offer some incredibly good value journeys on RTD such as Denver to Boulder. In addition, the proposed \$88 monthly fare cap / pass will offer anybody who uses RTD multiple times a week a great deal, including those who work at Denver Airport. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps / passes and airport fares for low income riders, seniors, Medicare recipients and riders with disabilities. Lastly, I support the trial of free youth fares, which will be a huge benefit to the districts' high school students.
I appreciate all three of these changes. It makes more sense.

I hope the lower pass program minimums encourages my employer to participate. The cost of commuting as we return to the office, particularly parking, feels so high. I would love a free transit benefit. It would give me a reason to opt for the train.
Have you permanently closed the Downtown Boulder bus station? I live a block away and I've seen no interior changes in the last 3 months? Please announce and publicize your plans for the bus station!
I am a social worker with Denver Public Schools and I am a huge proponent of the Zero Fare for Youth Pilot. Anything we can do to reduce barriers for youth to attending school is so vital. I wonder if this pilot can be tied to existing programs/structures such as the MyDenver Card or school ID cards. Thank you for work on this and your efforts to engage the community.
So thankful that kids under 19 will be able to get the bus for free. I can see what a hardship even the reduced fare/monthly pass has on my teen's friends. Thank you for piloting this.
Age discrimination. That is a point that I would like to see considered. You plan to give one age group free travel, and still expect everyone else to pay. So, for example, you have two friends board. One is 19, the other is 20. One of them has to pay and but the other gets to ride free. It makes no sense. How hard is it to expect a youth to pay \$0.90 or \$1.80. If free for one, than it has to be free for all. A good segway to the next point: Why have any fares at all if you do not plan to ever enforce it? It is warning, after warning, after warning. But no actual consequences. "Educate and accommodate" that's all I ever hear. How many times should someone be "educated" before there is any ENFORCEMENT? There are laws for a reason. Use those laws to enforce fares. Or simply stop all fares and go to a FULLY FREE system. It is not practical to have it both ways. It is not fair to not make everyone or no one pay fares. It is not fair to single out one age group to be free and then expect others to pay. It is not fair to expect people to pay, but yet not consequence those that do not pay. Just get it over with and go to a fully free ride system. And then beef up police presence on the buses and trains because free will attract crime, homeless camping, drug use, etc. The system still has not recovered from 'free for covid' issues that continue to plague the transit system.
I used to love taking RTD before the pandemic. I am very leary of going back due to the increase in crime. I hope this will be addressed.
The new fare structure is great and will help the region reach its equity, climate, and safety goals. Can you provide more transparency online about how this will impact RTD's overall budget? My only concern is that the loss in revenue will lead to additional service cuts, when what we need most right now is more frequent service and extended service hours. Thank you.
I'm writing to share my excitement and concerns about the proposed changes to the RTD fare and pass structure. I'm happy RTD is simplifying the structure and reducing the cost for all riders but especially frequent riders through the monthly pass. I'm also excited to see the free fares for youth pilot program, and consolidation of the discount programs into one. I have 3 children and this will be a great opportunity for them to ride transit more. Awesome that you included the airport 🚗. I'm concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Round down the prices to even dollar amounts or have a ride card that people can front load with money. Debut off at people ride. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. [ADD YOUR PERSONAL EXPERIENCE AND OPINIONS. Do you ride transit? Have you been unhoused? Do you have school-age children who could benefit from free fares?] I urge you to adopt these changes, implement them as soon as possible, and keep pushing for state funding to further improve the fare and pass structure toward affordability and equity to make our transit system accessible for all. Thank you.

The current price structure that RTD is using, penalizes individuals that are considering using public transport. A couple looking to go downtown will spend upwards of 20\$ on just transit with RTD. This does not encourage public transit use.
Please, please deal with various riders who feel entitled to smoke or vape on the train or bus. It is unfair to the non-smoking riders to observe the security guards also covertly vape on the train platforms, and then they expect us to obey the rules they supposedly have the power to enforce. It can be harmful when I need to step away from the smokers who need to puff up in billows of germy smoke just before boarding.
I like and appreciate the lower pricing that is proposed for RTD Service. The price has been going up and the quality has been going down of RTD Services: timeliness, cleanliness, safety, reliability etc. Also, it didn't make sense that it cost the same amount to go to Boulder as it does to go to the airport from Denver. The price of \$10.50 round trip for a trip that is more than 3 hours was not the most logical, especially since 1 hour of that time is spent on the bus so the transfer would only be good for 2 hours. Also, I haven't liked the zoning since I started using RTD over 10 years ago. It is difficult for new riders to understand and makes traveling within the Boulder/Denver/Aurora metro area more expensive and deters people from going outside of their zone.
The new fare structure makes the monthly fare something I would actually purchase. As a 4-5 day a week user, the current local monthly fare doesn't make any sense for me to use because if I go on a trip, work from home an extra day, or need to drive to work for whatever reason, I end up spending more than I would on local fare 10-packs. At an \$88 flat rate for full use of the system, I'd buy that every month. It also incentivizes me as a regular rider to take the train to the airport. As someone who does not necessarily live close to the A-line, the cost of taking the A line+a cab to the station vs driving to the airport is a wash. The next thing I hope to see is increased frequency of A line trains and have increased frequency later into the night (or atleast on busy nights like sundays). As it stands, transferring from light rail to the A-line adds 15 minutes to the already long trip to the airport
I think the change in the fare prices is a really good idea especially for those of us who use the bus on a regular basis. The only thing that would be amazing is if Live offered a monthly pass. I think giving youth a free monthly pass is a fabulous idea.
They should not let anyone come in the bus like homeless
RTD buses and light rail are already free for anyone who chooses not to pay.
They should lower the mond pass it it to much money to pay at once
They should lower the month pass so many people cant aford to buy The pass because it is to much money
They should lower the price and have equil prices for al type of trasportacion
All older people should not have to pay to ride a bus
I take the A line daily to the airport for work and I think the monthly fare of \$88.00 will help al lot of us passengers especially people who need to take public transit to get to work daily.
For taking time to read the police's and putting them in place
I think the new fare will benefit everyone across the community. I fully rely on RTD and I've been utilizing RTD for 38 years since I was 15. I don't know how the discount programs work though so it would be hard for me to help others apply in my community.
Move the airport fare to \$11.50 but create a Colorado residents discount that lowers the fare to \$5.00 for residents by entering their zip code and their drivers license/state ID number at the time of purchase. The rider could make this part of their RTD app profile so that they don't need to reenter it over and over again. This system would have tourists subsidize the system while avoiding excessive fares for residents who need to ride more frequently.



I hope the fares can be reduced or removed entirely for the people of Colorado. Having better access and more realiable public transportation will benefit everyone in the long run.
I fully support the new fare structure. This is very similar to the fare structure that was in place when I was living in Chicago. It made the system easy to understand and easy to navigate and was a big reason why I felt happy relying on public transport throughout the entire time I lived in that city. Upon moving to Denver, I thought the RTD fair structure was confusing and priced too high for what the system offered. At the time I worked at the airport and ultimately I had to resort to driving, because it made more economical sense.
This is a step in the right direction for the RTD and access to regional transit will benefit from this. I personally do not currently use this service because of the cost, I commute to Boulder and the price for bus fare is about the same as driving without the convenience. If this new structure is implemented, there is more of a benefit to me personally in using public transit (along with less impact on the environment, traffic, etc.). I imagine I'm not alone in my reasoning and that ridership will increase, justifying more investment in the system from the state. This is a good thing for everyone!
Until you make good on the NW Rail, I consider you as nothing more than a group of thieves.
I think it's a good idea to have both the local and regional fares combined into one price. It's time consuming having to check the schedules just to see which buses are local and regional. I remember sometime last year, I emailed a RTD representative about what pass I have to buy to get to work. I was told local, but it turns out that I needed the regional pass. The two different prices for local and regional is so confusing that even customer service cannot figure it out. Please combine it into one price.
Cut the cost of fares and you will see more people use the trains. = more \$
Please pass this and the current structure is confusing and pricey for those of that don't drive
I applaud RTD for the changes in fare collection. The new fare structure will make transit easier to use and more accessible to folks on limited income. The new monthly pass program will likely increase ridership. But RTD needs to do even more to increase ridership. Raising funds from the state to improve service by increasing frequency and reliability along major transit routes would probably increase ridership even more.
I'm writing to share my excitement and questions about the proposed changes to the RTD fare and pass structure. I'm happy RTD is simplifying the structure and reducing the cost for all riders but especially frequent riders through the monthly pass. I'm also excited to see the free fares for youth pilot program, and consolidation of the discount programs into one. I have questions about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. I use RTD as much as possible, but find that my bike is a more reliable way to get around. I'd love to see increased frequency, more consolidated lines focused on Denver and less on the suburbs, and better north/south routes. I'd also love to see free fares for all kids (under 18) and more emphasis on supporting bus routes that get middle and high school aged kids to school and back without having to rely on cars. I urge you to adopt these fare changes, implement them as soon as possible, and keep pushing for state funding to further improve the fare and pass structure toward affordability and equity to make our transit system accessible for all. Thank you. -- amy campbell

Airport employees currently are nearly punished for commuting on the RTD with the monthly pass being \$200 (no benefit for a regular commute of less than 20 days/month). If you bring this down, you'll be bringing more employees to the airport and therefore more sustainable growth for Denver!
love the changes in general. it's easier and cheaper. however, the airport is still too expensive. I think it's ok to charge a premium for the airport but only if the service is top notch. to qualify for such a premium, I think frequency would have to increase as well as reliability. I don't think the current service qualifies for \$10
I would like to express my support for the proposed fare structure recommended by the Fare Study. The new fare structure is much simpler to understand for riders (I moved here last year and it took some time to understand it). I believe the proposed \$88 monthly pass will offer anybody who uses RTD multiple times a week a great deal, including those who work at Denver Airport. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps / passes and airport fares for low income riders, seniors, Medicare recipients and riders with disabilities. Lastly, I support the trial of free youth fares, which will be a huge benefit to the districts' high school students and will instill the transit goals our nation wants in our young folks.
Hi, just wanted to say that I'm a fan of the reduced monthly fare. I've previously considered getting a monthly pass because it would encourage me to take the train more. The previous monthly price simply did not make sense unless I was commuting daily. The more people that have a monthly pass the better, it's much easier to decide to ride transit if it's already paid for
This policy does sound more equitable.
I support the proposed fare structure as recommended by the RTD Fare Study. The new fare structure is much simpler to understand and is more equitable for people who rely on transit for many trips a month. The lower fares and simplified pricing structure may increase ridership while being cost-effective for frequent riders. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps/passes and airport fares for low-income riders, seniors, Medicare recipients, and riders with disabilities. Lastly, I support the trial of free youth fares.
Hello, thank you for reducing the airport fare and suggesting the Zero Fare For Youth pilot. I think this is huge because the current pricing is still an unattractive option for many families. Take for example a family of 2 adults and 2 children taking a 5 day trip. The round trip A-line cost is \$80 and parking at the airport will be approximately \$86 (in the Economy lot which is a 5 minute walk). With the Zero Fare For Youth program, that same A-line roundtrip comes down to \$40, a much more attractive option!
As a refugee resettlement caseworker, I support the simpler fare structure of local/airport instead of local/regional/airport. The lower cost of a monthly pass is also a great idea. We support our new refugee and immigrant neighbors with bus passes as they search for and begin employment in metro Denver. We often purchase passes or ticket books in bulk so I highly support the recommendation "to support nonprofits, employers and social service organizations through bulk purchase discounts, Pass program expansions and a transit assistance grant program." Our nonprofit's budgets are very tight and any way to help our newcomers make it around the city safely are welcome. We are in high need of volunteers & workers who could provide transit training to our newcomers, so a grant program to help pay for that would be something we could apply for. Thank you.
Thank you for proposing more affordable fares!!
I support efforts to reduce fares to make transit access more equitable and increase ridership.
I've been away for the last two years but I miss riding the trains. I'd like to think with the new fare structures and an e-bike, people would give up driving as much do the monthly pass. April 2019 - Oct 2019 was a great period in my life when I took my e-bike on the G and A line getting off at Central Park and riding the rest. My emotional state was so much better when I rode.



I am very supportive of the proposed fare structure as recommended by the RTD Fare Study. The new fare structure is much simpler to understand for riders and will offer some incredibly good value particularly for families traveling with children. In addition, the proposed \$88 monthly fare cap / pass will offer anybody who uses RTD multiple times a week a great deal, including those who work at Denver Airport. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps / passes and airport fares for low income riders, seniors, Medicare recipients and riders with disabilities. Lastly, I support the trial of free youth fares, which will be a huge benefit to the districts' high school students. Having kids and teens riding will help build long term ridership as they become more familiar with public transit.

I am writing to express my support for the proposed fare structure as recommended by the RTD Fare Study. The new fare structure is much simpler to understand for riders and will offer some incredibly good value journeys on RTD such as Denver to Boulder. In addition, the proposed \$88 monthly fare cap / pass will offer anybody who uses RTD multiple times a week a great deal, including those who work at Denver Airport. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps / passes and airport fares for low income riders, seniors, Medicare recipients and riders with disabilities. Lastly, I support the trial of free youth fares, which will be a huge benefit to the districts' high school students

I am absolutely thrilled to see this simplified fare structure. One of the biggest mental barriers when taking light rail especially is trying to figure out local vs regional zones, especially when the difference between them wasn't always clear. Every simplification of the fare structure makes it easier and easier to get where I'm going without having to do mental gymnastics trying to figure out which ticket is needed, and therefore makes it easier to just ride and get where I'm going. I'm glad to see RTD moving further in this direction. I am most excited about the single price monthly pass. Due to the zone issues and the high cost of the current fare structure, a monthly pass has not been feasible for me or most people I know. Reducing the cost and providing a single pass for all areas makes it much more likely that I'll maintain a monthly pass out of convenience if nothing else.

I'm writing to share both my excitement about the proposed changes to RTD fares, as well as some recommendations for how to continue to make RTD more accessible and equitable. First and foremost, it's an incredible boon to riders to simplify the fare system. Thank you for doing that! Just as exciting are the free fares for youth pilot program and consolidation of the discount programs into one. I am concerned, though, about how the 3-hour passes will end up costing certain folks who pay in cash to pay more, because RTD doesn't issue change. I'd like to advocate for requirements to be relaxed so that more individuals could qualify for discounted passes. Last, I want RTD to prioritize finding funding for a permanent free fares for youth program. Obviously, these aren't changes that could be made without additional funding. Could RTD pursue partnerships with the state to make these changes happen?

Price is ridiculously high and not cost effective! Especially when it's not reliable.

When I first moved to Denver, I honestly avoided RTD because I didn't understand the system, specifically "local vs. regional" destinations. I had lived in DC and London and traveled in New York and Boston on the public transportation, but those systems seemed much more intuitive to me. The first time I used RTD was to take the A line to the Airport because I knew I couldn't mess up the "Airport fare." I appreciate the combination of Local and Regional to make the system easier to understand. And I know you'll get complaints about the Airport fare being higher, but let's be real - for most people it is more cost effective than the alternatives of parking or Ubering, and if you can get to the airport for less than \$10 some other way, good for you and travel that way. The fact that you don't have a higher airport charge for discount customers and that youth are free relieves any angst I might have about having a higher airport fee. If kids, low income families, seniors and folks with disabilities can get to the airport cheaply, the business and casual travelers can pay \$10. It looks like

RTD is listening to what its customers are asking for and I appreciate that. Hopefully this process will show support for free fares for youth so school districts or state or local government will fund the program.
The consolidation of local and regional fares is great. I would suggest keeping whole dollar amounts as the fares to better facilitate cash transactions. \$3 for 3 hr and \$5 for day seems like a better pricing structure in my opinion. \$6 is harder to do with cash if you don't have exact change since it's a huge loss to feed in a 10.
We should absolutely be providing free public transit for youth. Also, if public transportation in Denver was better structured (as in does not take significantly longer than other modes of transportation or is more direct) then more people would use it. I talk to people all the time who want to ride buses and trains but it is simply not reasonable for their needs.
Getting rid of the regional fare is one of the smartest things RTD can do. The lower monthly rate is fantastic, and I think youth riders should ride free always. As a daily rider, I'm excited about these changes.
Under 19 free will get young people in habit of jumping on a bus something Denver needs desperately.
I like that local and regional are the same fare. however, the new suggested fares are still higher than other major cities. Chicago charges \$2.25 for bus fare and \$5 for airport. Houston charges \$1.25 for bus fare. Austin, which has a comparable cost of living charges \$1.25 for single rides, \$2.50 for day passes. We can do better for people who rely on buses for transportation!
Without a car, I rely heavily on RTD to get to and from work. A reduced fare structure would help with my household budgeting and make public transport a way more feasible option for some of my coworkers stuck in traffic or who have to rely on rideshares!
There used to be so many airport employees who rode with RTD and have since stopped to the the outrageous monthly pass cost. The new fare structure should increase ridership in the future . Thank you
I think the proposed fare structure looks great, especially the lower monthly pass price. I work with so many at the airport who won't buy a monthly pass since they think \$200 is too much. I think the proposed new fare structure will increase ridership. Thanks!
sounds like an easier option. I'm in favour. Just wish to have it feel safe to ride RTD again, including light rail. It's been awhile, and the news continues to paint a disturbing picture. Even the choice of Chestnut Pavillion for a next community meeting is kind of scary, based on my experiences at that location. Thanks.
it is simply criminal to charge 5.25 to get from longmont to boulder. To get to and from work i pay that twice a day and it amounts to over 30% of my bi weekly paycheck. i may as well lyft or do really anything but use rtd. this is public transportation make it accessible to the public.
Wonderful changes being proposed. They could be even better: Find a fare for Discount passengers that doesn't require having change. Make free youth fare permanent. Find a way to allow homeless people without address to qualify for discount fare. Thank you for your good work!

I'm writing to share my support and concerns about the proposed changes to the RTD fare and pass structure. I'm happy RTD is simplifying the structure and reducing the cost for all riders but especially frequent riders through the monthly pass. I'm also glad to see the free fares for youth pilot program, and consolidation of the discount programs into one. I'm concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. However, while these changes are good, the most important thing RTD could do to better serve the community and increase ridership is BETTER SERVICE—more frequent and expansion into newer developments that currently have limited or car required service. I've been riding RTD and its predecessors since the 1950s and service never gets better. Thank you.

How are you going to be able to keep enough coins in the ticket kiosks to return 30 cents for every 3 dollar bills inserted for my discount fare? Are you going to return to having discount ticket books available for purchase? (One of the two kiosks at Southmoor has been down since before the pandemic!)

I'm actually just curious who is taking in these comments. Is it GBSM? Just curious. Thanks!

This makes a good deal more sense, as monthly passes will probably be used by actual city residents, not just tourists.

Would love to see these fares lowered for more equity! This makes the monthly pass much more appealing

Thank you for proposing to lower the fee for the train to the airport. It was always odd to me how the current fee is so much higher than other major cities in which I've lived. The blue line from downtown Chicago to OHare is \$5. The MARTA in Atlanta is \$2.50 flat rate anywhere. Ridership will increase with lower fees. Thank you for recognizing this!

I'm writing to share my excitement and concerns about the proposed changes to the RTD fare and pass structure. I'm happy RTD is simplifying the structure and reducing the cost for all riders but especially frequent riders through the monthly pass. I'm also excited to see the free fares for youth pilot program, and consolidation of the discount programs into one. I'm concerned about a few barriers to true accessibility and affordability. The 3-hour passes, by requiring exact change, will mean many folks who pay with cash on the bus will end up paying more. Additionally, I'd like RTD to remove some of the requirements to qualify for discounted passes that prevent access for folks who need transit accessibility the most. I'd also like RTD to prioritize finding funding for a permanent free fares for youth program. These changes would make our transit system truly accessible and affordable. I know these require increased funding, and I urge RTD to pursue partnerships with the state for these changes. As a young professional, I do not own a car and solely use RTD and car shares to get around. I moved to Denver from Chicago, and it has been an absolute struggle trying to use RTD to its fullest. This is not a comment on the hardworking employees who get the trains and buses moving, rather this is a comment on the accessibility and privilege it takes to use RTD at all. This past Sunday 4/16, for example, I had to take the trains to get down to Arapahoe in DTC by 11:30 am. According to my Maps and Transit map, the easiest route was taking the H to the E train. However, when arrived to the 18th/Stout stop for the H train, it had been cancelled for reasons of which I do not know. So then I had to wait an additional 20 minutes for the next H train. When that H train came, I took it, no problem, and transferred to the E train. As I was taking the E train, everyone was removed from the train at Southmoor and we had to wait another 15 minutes for the next E train. So I was over 30 minutes late to my destination. Had I been an employee relying on this, the schedule would have

been completely wrecked and I likely would've been in trouble. It is exactly this kind of unreliability that makes RTD inaccessible that harms the people who rely on it. I urge you to adopt these changes, implement them as soon as possible, and keep pushing for state funding to further improve the fare and pass structure toward affordability and equity to make our transit system accessible for all. Thank you. Rachel Fischer

I really do not agree with lowering regional and airport fares. It goes against your own equity analysis and just reduces revenue. Local fares are too high, but the bulk of the savings goes to regional and airport fares. Reducing those fares is not going to move the needle on ridership as much as better and more frequent transit within Denver. The A line will always have trouble competing with personal transport. Ditto with regional rail, especially lines with less frequency than the A, like all of them. Focus more on Denver and less on your regional partners. There is much more to gain in terms of equity, ridership, climate and air quality. The price is too high for local transit, yes, but the real problems are frequency of service and travel times and safety concerns.

Make RTD free forever. Drivers seemed much happier and it's 85% paid for by taxes anyway

I think that restructuring fares for everyone in the RTD area will be a great thing. I have friends that do not have much money to get RTD to different places and doing this, I think would be good for them. Also families with children, this too will assist them with getting to baseball games, schools and family outings. Thanks in advance!

\$88 is more reasonable for a monthly pass, although still overpriced (as an example, Chicago offers a monthly pass for \$75 and Omaha, a city with a similar size to Denver, offers one for \$55). I would love to ride the bus everyday but it is cheaper for me to drive my car. The monthly rate needs to be set at a rate that makes it a reasonable choice.

This is SO MUCH BETTTER than the current structure it's not even funny. Please, please, \*please\* ensure that this goes into place. The simplification of the fare structure will provide huge benefits in terms of day-to-day usability, and making passes only \$88/month is a huge benefit to increasing ridership.

I am writing to express my support for the proposed fare structure as recommended by the RTD Fare Study. The new fare structure is much simpler to understand for riders and will offer some incredibly good value journeys on RTD such as Denver to Boulder. In addition, the proposed \$88 monthly fare cap / pass will offer anybody who uses RTD multiple times a week a great deal, including those who work at Denver Airport. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps / passes and airport fares for low income riders, seniors, Medicare recipients and riders with disabilities. Lastly, I support the trial of free youth fares, which will be a huge benefit to the districts' high school students.

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<p>As for the fare structure, I think that the proposed structure is more equitable...but I must add that I was in Miami earlier this year, and their transit system doesn't require a special card...all of the buses and trains have an option to just tap your credit or debit card to pay the fare. As for "programs" I am very disappointed that the Boulder bus station has remained closed for many months...through the windows there has been NO change in what the interior looks like. Have you abandoned this station, which at one time had more riders than Union Station?</p>
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<p>Fares look great. Youth free fare program and college pass discount absolutely. Equity informs justice and access.</p>
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I am writing to express my support for the proposed fare structure as recommended by the RTD Fare Study. These new fares will make monthly passes more accessible to me and my family. The new fare structure is much simpler to understand for riders and will offer some incredibly good value journeys on RTD such as Denver to Boulder. In addition, the proposed \$88 monthly fare cap / pass will offer anybody who uses RTD multiple times a week a great deal, including those who work at Denver Airport. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps / passes and airport fares for low income riders, seniors, Medicare recipients and riders with disabilities. Lastly, I support the trial of free youth fares, which will be a huge benefit to the districts' high school students.

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I used to take the A train to the airport from 40th. Why should I pay \$10.00 for 2 stops? That's why I don't take it anymore. It needs to be adjusted for where you get in to the airport. I can hitch a ride for less than \$20 round trip and not have to pay for parking on top of that.
I am writing to express my support for the proposed fare structure as recommended by the RTD Fare Study. The new fare structure is much simpler to understand for riders and will offer some incredible good value journeys on RTD such as Denver to Boulder. In addition, the proposed \$88 monthly fare cap / pass will offer anybody who uses RTD multiple times a week a great deal, including those who work at Denver Airport. I am also in support of raising the LiVE discount to 50% and providing steeply discounted monthly fare caps / passes and airport fares for low income riders, seniors, Medicare recipients and riders with disabilities. Lastly, I support the trial of free youth fares will be a huge benefit to the districts' high school students.
It would be wonderful if the rate for non-profit organizations and bulk purchases were lowered. All our students are blind and in an independence program and buy monthly passes--we are strengthening their travel skills and they will continue to ride public transportation because of this training.
No cost fare for students would be very helpful for our students here at Lotus that utilize Public transit. We are a charter and do not have busing so many of our students take RTD.
I think the suggested fare changes are great. They are much easier to understand and a lot more realistic for people to afford. Lower cost will encourage more people to use public transportation. However, you have to do something about the smelly homeless people taking up several seats on the lightrail. I would use it more, but I know I will have to encounter smelly homeless people and have to suffer through that the entire ride. I also wonder what they have done to my seat before I arrived. It is very discouraging because I want to use public transportation more.
Wow, something that makes sense from RTD. Nice work and historical occasion - first time I can recall RTD not making a bone-headed decision. Now on to Boulder/Longmont light rail please....
After reading about the recommended fare structure, thanks, I like it, but please accept this comment: I avoid using RTD because of safety issues. Recently while riding I witness an assault (during the day) at a train station. Very distressing, an event that lingered in my thoughts for days. Regardless of what RTD might do with rates, without acceptable behavioral norms I will continue to avoid using RTD, both trains and buses
I think the new structure would not be a bad idea but I also think the idea of prolonging the discount card would also not be able to battle the. Ninety instead of five years why not 7or 10 yrs?

Why is this not implemented yet? It is clear from a year of community feedback that it is wanted and needed. It is a good first step to true Equity which would be eliminating fares altogether. The fare free August 2022 clearly showed the impact specific to the RTD service area of increased ridership with zero fares.
This new fare structure is much easier to understand and allows for tourists to see the city more easily.
How will this effect the live program
I applaud RTD for putting a new fare structure on the table. The new fares actually make me want to use transit more now to get to/from work, as it would be better for me financially. I hope the new fares are approved!
I'm literally just voicing my support. This plan is amazing, absolutely no complaints.

Muchas de las personas que se entrevistaron para la estructura de tarifa de cobro estuvieron de acuerdo, ya que para muchos de ellos esto sera una cosa que podran pagar en el futuro, (Many of the people interviewed for the fare structure agreed, as for many of them this will be something they are going to be able to afford in the future.)
Es muy bueno, ayuda a la población. (It is very good, it helps the people.)
Es muy bueno, ayuda a la población. (It is very good, it helps the people.)
Sí cambian la tarifa del bus seria de gran ayuda porque mi trabajo en centro no nos proporciona ningun tipo de descuento y yo no manejo. Soy una persona mayor y no gano mucho ya que me pagan el minimo. Gracias. (If they change the bus fare, it would be a great help because my job in the center does not provide us with any type of discount and I do not drive. I am an elderly person and I do not earn much since they pay me the minimum. Thank you.)
Gracias por apoyar a la comunidad esperemos que estas tarifas sean accesibles para los menos afortunados (Thank you for supporting the community. Hopefully, these fares are affordable for those who need it the most.)
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Gratis para todos (Free fares for everyone.)
Gratis (Free.)
Para que las personas que han entrado puedan acceder a las cosas mas barato (So that the people who have just arrived can afford things.)
Gracias por apoyar a la comunidad esperemos que estas tarifas sean accesibles para los menos afortunados (Thank you for supporting the community. Hopefully, these fares are affordable for those who need it the most.)
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Gracias por las nuevas tarifas es muy bien para las fam de bajos recursos (Thank you for the new fares. They are very useful for low-income families.)
Gracias por apoyar a la comunidad esperemos que estas tarifas sean accesibles para los menos afortunados (Thank you for supporting the community. Hopefully, these fares are affordable for those who need it the most.)
Gracias por apoyar a la comunidad esperemos que estas tarifas sean accesibles para los menos afortunados (Thank you for supporting the community. Hopefully, these fares are affordable for those who need it the most.)
Gracias por tomar en cuenta la opinión de la comunidad que esta palpando la necesidad (Thank you for taking into account the opinion of the community that cannot afford higher fares.)
Es mejor las nuevas tarifas por que yo no trabajo gracias (The new fares are better because I do not have a job. Thank you.)
Los cambios son excelentes para los clientes frecuentes (The changes are great for regular customers.)
Están bien los cambios ay personas que utilizan el transporte casi todos los días y al mes es mucho dinero gracias (The changes are fine since there are people who take public transport almost every day, and it is a lot of money per month. Thank you.)
Gracias por las nuevas tarifas (Thank you for the new fares.)
Las tarifas nuevas ayudarán a las personas como yo (The new fares will help people like me.)
Ayuda a personas como yo de bajos recursos (This helps low-income people like me.)
Organizar mas seguridad (Organize more security and safety.)
Falta seguridad en los buses (There is not enough security and safety on the buses.)
Servicios mas economicos (Economical services.)
No viajo en camion pero debe ser mas economico por las comunidades que lo usan. (I do not travel by bus, but it should be economical for the communities that use it.)
Estructuras de horarios no tan distanciados (More recurring bus timetables.)
No uso el servicio pero creo mas seguridad (I do not use the service but I think there should be more security and safety.)
Tarifas mas modicas (More affordable fares.)
Bajarle al precio a \$2 (Lower the price to \$2.)
Tener un pase más barato del año (Have a cheaper pass of the year.)
Qie sea mas econo.ico (An economical fare.)
Me gustaría que baje el precio a la personas de edad (I would like the elderly to pay cheaper fares.)
Tarifas baratas y espero bale mad (Cheap fares and I hope bale mad (sic).)
Tarifas baratas (Cheap fares.)
Seguridad (Security and safety.)
Podrian ofrecer servicios mas frecuentes durante los fines de semana y mas paradas de autobus en Littleton. (More frequent services should be offered on the weekend, and there should be more bus stops in Littleton.)
Mas economico (A more economical service.)
Excelwnte servicio, pero ne gystaria que hubiera mas rutas de autobus en mu area Thornton (Excellent service, but I wish there were more bus routes in my area, Thornton.)

En costo y la seguridad (Prices, and security and safety.)
Economico (Economical.)
Mucho dinero en boletos y en tiempo (It is a lot of money on tickets and a waste of time.)
Tarifas justas.trabajo antes de dos paradas para el aeropuerto y todos los dias debo pagar mas de \$60 a la semana. Mucho dinero (Fair fares. My workplace is two stops before the airport and I have to pay more than \$60 a week. It is a lot of money.)
Tarifas mas baratas (Cheaper fares.)
Seguridad (Security and safety.)
Seria conveniente mas seguridad. (More security and safety would be desirable.)
Un solo precio (One single fare.)
Tickets gratias (Free tickets.)
Tickets con kenos precio (Cheaper tickets.)
Tarifas mas baratas (Cheaper fares.)
Tarifa unica (A single fare price.)
Mas seguridad (More security and safety.)
No tiene comentarios (No comments.)
Gracias (Thank you.)
Gracias (Thank you.)
No tiene comentarios (No comments.)
Gracias (Thank you.)
Gracias por lo que están haciendo (Thank you for what you are doing.)
Deberían tener cuidado en quien se sube a los autobuses no es tan seguro (They should be careful about the people who get on the bus, it is not so safe.)
Es muy inseguro (It is very insecure.)
Tarifas iguales (Equal fares.)
Cuando llegamos el primer ano mi esposo y yo usamos el servicio y las rutas son demasiado largas. (During our first year here, my husband and I used the service and the routes were too long.)
No lo he usado (I have not used it.)
He usado el bus y trenes por casi 3 anos y es mucha inseguridad, suciedad y falta de respeto (I have been using the bus and the train for almost three years, and it is very insecure, dirty and people are disrespectful.)
No vivo en Colorado pero cuando llego de visita , los buses huelen a orines (I do not live in Colorado but when I visit, the buses smell of urine.)
Limpieza (Cleaning.)
A veces uso el tren y bus, no tenemos auto y es muy sucio y huele feo, los homeless suben drogados, orinados, oliendo a heces y son malgriados (Sometimes I use the train and the bus because we do not have a car. The public transport is very dirty and it smells bad. The homeless get on high, urinated, smelling of feces and they are disrespectful.)
Seguridad, vengo de visita cada dos meses o 3 meses y uso el bus y tren. Los buses son demasiados sucios (Security and safety. I come to visit every two or three months, and I use the bus and the train. The buses are too dirty.)
Tarifas iguales (Equal fares.)
Tarifas iguales para todos o servicios gratis (Equal fares for everyone or free services.)
Todos tengamos tarifas iguales (We should all pay the same fares.)

Tarifas economicas (Economical fares.)
Seria bueno que todos paguen tarifas iguales (It would be nice if everyone paid the same fare.)
Estoy de acuerdo que los chicos viajen gratis (I agree that kids should be travel for free.)
Tarifas justas (Fair fares.)
Estoy de acuerdo wue los menores de 17 anos no paguen el bus. (I agree that 17-year-olds and younger travel by bus for free.)
Tickets baratos (Cheap tickets.)
Tarifas justas (Fair fares.)
Un programa wue ayude a la comunidad latina (A program that helps the Latino community.)
Igualdad de tarifas (Fare equality.)
Seguridad (Security and safety.)
Mas seguridad (More security and safety.)
No vam9s al camion pero nos dicen es muy sucio (We do not take the bus but we have been told it is very dirty.)
Economicas (Economical fares.)
No usamos camiones pero dicen que es peligroso (We do not take the bus but we have been told it is dangerous.)
Tarifas economicas para todos (Economical fares for everyone.)
Tengo auto pero apoyo cambios positivos para los latinos (I have a car but I support positive changes for Latinos.)
No lo uso pero ayudaria que fuera mas e onomico (I do not use it but it would help if it were more economical.)
No lo uso (I do not use it.)
Tarifas economicas para todos (Economical fares for everyone.)
No lo uso (I do not use it.)
No lo uso (I do not use it.)
Tarifas justas (Fair fares.)
Mas seguridad (More security and safety.)
Uso el camion y sea mas economico. (I take the bus and it should be more economical.)
No uso este servicio, pero mis companeras lo usan y dicen no es seguro. (I do not use this service, but my female coworkers use it and they say it is not safe.)
Tarifas para la comunidad latina. (Fares for the Latino community.)
Seguridad (Security and safety.)
Seguridad (Security and safety.)
Programa de seguridad (A security and safety program.)
No he usado este servicio pero me preocupa la seguridad por todo lo que me cuentan. (I have not used this service, but I am concerned about security and safety from everything I have been told about it.)
No uso camiones pero me preocupa la seguridad por todo lo que escucho de mis companeras (I do not take the bus, but I am concerned about security and safety from everything I hear from my female coworkers.)
Mas economico ( A more economical service.)
Los latinos usamos el bus y nos pagan poco seria justo tarifas mas economicas. (Latinos take the bus and we have bad-paid jobs, so it would be fair we pay more economical fares.)

Mas seguridad (More security and safety.)
Los camiones estan sucios y huelen terrible. (The buses are dirty and they smell terrible.)
Tarifas mas justas (More fair fares.)
Tarifas justas (Fair fares.)
Mas seguridad (More security and safety.)
Tarifas mas baratas para los latinos (Cheaper fares for Latinos.)
Mejoras para las personas (improvements for people.)
Talleres de informacion (Information workshops.)
Averiguar (Research.)
Mas barato (Cheaper)
Limpieza (Cleaning.)
Programas economicos (Economical programs.)
Seguridad en el camion (Security and safety on the bus.)
Seguridad (Security and safety.)
Tarifas economicas (Economical fares.)
Tarifas economicas (Economical fares.)
Tarifas economicas para todos. Somos latinos y ganamos poco dinero. (Economical fares for everyone. We are Latinos and we earn little money.)
Seguridad (Security and safety.)
Tarifas mas bajas para la comunidad latina. (Lower fares for the Latino community.)
Tarifas iguales para todos. Los sueldos son muy bajos para la comunidad latina. (Equal fares for everyone. Salaries are very low for the Latino community.)
No tengo carro y es los buses son peligrosos, las personas que viven en la calle no respetan. (I do not have a car and the buses are dangerous. People who live on the street are not respectful.)
No, he usado camion ni tren pero se por mis amigas que da miedo, mucha inseguridad. (No, I have not taken the bus or the train, but I know from my girlfriends that it is scary and very insecure.)
Deberian de bajar la tarifa ya que hay pesonas de miy bajoa recursos que deben de caminar para ir a la escuela ya que no cuentan con este pago del bus (Fares should be lower since there are low-income people who have to walk to school since they cannot afford a bus ticket.)
Mas economico (A more economical service.)
Que sean mas economicos todos los biles (Make all tickets more economical.)
Los boletos sean mas economicos (Tickets should be economical.)
Bajar kas tarifas (Lower the fares.)
Tener mas vigilancia (There should be more security and safety.)
Que las tarifas sean mas accesibles (Make the fares more affordable.)
Ahora ya no lo uso, pero es mucho dinero y muy sucio (Now I do not use it anymore, but it costs a lot of money and it is very dirty.)
Un tiempo use el bus y habia mucho homeless mal educados. (I took the bus for a while and there were a lot of rude homeless people.)
Ganamos poco (We earn little money.)
Mucho dinero todos los dias (It is a lot of money every day.)
Use el camion y me fue mucho dinero y demasiadas horas. (I took the bus. It cost a lot of money and the trip was too long.)

Debe ser la tarifa mas minima, no hay mucho trabajo. (We should be charged the lowest fare because there is not much work.)
Me gustan los cambios k se están implementando (I like the changes that are being implemented.)
Tener Mas seğuridad en Los busses Parque a veces Los homeless faltan el respeto (There should be more security and safety in the buses because the homeless are sometimes disrespectful.)
Las tarifas nuevas son muy asepables (The new fares are very affordable.)
Las tarifas bajas es ayuda para las familias de bajos recursos (Low fares are helpful for low-income families.)
Se bajan las tarifas sería buenísimo para todos (If fares were cheaper, it would be great for everyone.)
Que todas las tarifas sean accesibles para todos (All fares should be affordable for everyone.)
Me gustan los cambios ayudará a muchos (I like the changes, they will help many people.)
Estoy de acuerdo con los cambios (I approve of the changes.)
Que todos paguemos lo mismo y los estudiantes gratis (We should all pay the same, but students should travel for free.)
Que las nuevas tarifas ayudarían a las familias de bajos recursos como yo (I think the new fares would help low-income families like mine.)
Con los cambios ayudarán a muchas personas (The changes will help many people.)
Las tarifas le parecen bien especialmente para los jovenes (The fares seem fine, especially for young people.)
El cambio de tarifas son asepables (Fares are affordable now.)
Los cambios son buenos para nosotros que ganamos menos (The changes are good for us who earn less money.)
Las tarifas nuevas ayudan a las familias (The new fares help families.)
Las nuevas tarifas ayudan a persona de bajos recursos (The new fares help low-income people.)
Que está muy bien los cambios (The changes are very good.)
Que las cosas que se pierden las aguarde (Lost stuff should be stored somewhere.)
Ayuda a muchos como yo de bajos recursos la nueva tarifa (The new fare helps many low-income people like me.)
Creo que las tarifas nuevas serán de mucha ayuda a las familias de bajo recursos (I think the new fares will be very helpful to low-income families.)
Gracias por la ayuda (Thank you for the help.)
Gracias (Thank you.)
Gracias (Thank you.)
Muy buena que todos los mejores precios de las tarifas sean más bajos (It is really good that all fares are cheaper.)
Que sea accesible para tod@s para que puedan acceder a usar el transporte (It should be more affordable so that everyone can take the public transport.)
Gracias por atender las necesidades (Thank you for meeting the needs.)
Economico (Economical.)
Tickets mas economicos para los que ganamos poco (More economical tickets for those of us who earn little money.)
Tienen infraestructura para poder hacer un programa de match? Por ejemplo, si una familia quiere donar un pase, o dos, a alguien que lo necesite, como se podria hacer eso? Me encanta ver la equidad en la nueva estructura. Mi hija usa el metro y hay veces comenta que sus compañeros usan el transporte pero no tienen pases. Es justo que tengan acceso a este recurso para poder llegar a la



escuela. (Do you have infrastructure to be able to make a match (sic) program? For example, if a family wants to donate a pass or two to someone in need, how could that be done? I love seeing equity in the new structure. My daughter uses the subway and she sometimes comments that her classmates use the transportation but they don't have passes. It is only fair that they have access to this resource in order to get to school.)
Para nosotros fuimos con las personas a las paradas de los autobuses y en diferentes eventos, Compartimos informacion afuera de las tiendas de comida, hicimo nuestro evento de diciembre donde tubimos al rededor de 800 participantes y se les dio la informacion del RTD. Por lo menos cada mes tenemos 3 eventos donde damos clases para el cuidado de ninos y damos la informacio de los RTD, todos los grupos que tenemos se habla del RTD. (In our case, we went out to people at bus stops and different events; We shared information outside food stores, and we did our December event where we had about 800 participants and we also gave them information about RTD. Every month, we host at least 3 events where we offer childcare classes and RTD information, all the groups we have are talking about RTD)
Nosotros realizamos y atendimos varios grupos donde dimos la informacion del RTD tambien asistimos a las paradas del RTD para platicar con personas que utilizan el autobus asi logramos que muchas personas respondieran el servey, ya en nuestro evento de navidad fueron 800 participantes y a todos ellos se les hablo del RTD de unamanera y otra Una Mano Una Esperanza hablo he invito a la comunidad a participar en la estructura y la equidad de tarifas de RTD (We also went to the RTD bus stops to talk to people who use the bus so we got a lot of people to respond to the survey; At our Christmas event, we had about 800 participants and we also talked to all of them about RTD in one way and another. UMUE talked to them and invited the community to participate in the RTD structure and fare equity análisis)
Me parece bien porque la gente no tiene mucho dinero. (I think this is good because people don't have a lot of money.)
Aprueben las tarifas reducidas. (Approve the reduced fares.)
Me gustaria que la tarifa fuera mas equitativa para todos y mas accesible especialmente para los estudiantes y personas que lo usan a diario. (I would like the fare to be more equitable for everyone and more accessible, especially for students and people who use it on a daily basis.)
Es muy importante eventos como este en el que podemos aprender de los cambios en el transporte que es algo muy importante para la comunidad en general. (Events like this are very important as they provide an opportunity for us to learn about transportation changes, which is crucial for the community as a whole.)
Esta bien lo que estan haciendo por bien de la comunidad. (What you are doing for the good of the community is commendable.)
Me parece buena idea ya que alludaria un poco en nuestra economia. Gracias (I think it's a good idea since it would help a little with our economy. Thank you.)
Me parece muy bien el nuevo cambio. Pienso que para muchas personas nos va a beneficiar las nuevas tarifas. Muchas gracias. (I think the new change is great. I believe the new fares will benefit many people. Thank you very much.)
Estoy muy contenta de los programas y la equidad tarifaria, ya que soy parte del uso constante del RTD, estas alternativas va a ser muy positivo para las familias que utilizan a menudo el RTD. (I am very happy about the programs and fare equity since I am a regular user of the RTD. These alternatives are going to be very positive for families who frequently use the RTD.)
Me gusto informar a mis conocidos sobre las nuevas tarifas para todos- para que tengamos equidad de precios para todos. (I enjoyed informing my acquaintances about the new rates for everyone - so that we have price equity for all.)

Las tarifas mas economicas para la comunidad latina, y mas seguridad. (More economical fares for the Latino community and more security.)

# **RTD 2025-2028 Title VI Program**

## **Attachment T: May 2023 Service Equity Analysis**

DRAFT

# BOARD OF DIRECTORS REPORT

## May 2023 Title VI Service Equity Analysis

Committee Meeting Date:
March 8, 2023
Board Meeting Date:
March 28, 2023

### RECOMMENDED ACTION

For the Board of Directors to adopt the Title VI Service Equity Analysis report for January 2023 service changes to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964 as well as to meet the 2021-2026 Strategic Plan priority of Community Value.

### STAFF REPRESENTATIVE

Carl Green Jr., Director, Civil Rights

### PRESENTATION LENGTH

15 minutes

### BACKGROUND

The 30 service changes proposed for May 2023 provide opportunities for bus and rail operators to vote new work assignments and for the Service Development Division to adjust the overall operations plan for the transit network. Additionally, with the Board-adopted Reimagine RTD System Optimization Plan (SOP), several of the service change proposals reflect the first phases of SOP implementation to provide the best possible customer value.

The Board-adopted guidance for proposed service changes continues to be:

- Service performance evaluation based on service standards
- Maintaining the overall integrity of the transit network and on-transit dependent markets
- Making alternative services available to affected customers
- Cost-effective distribution throughout the District and Family of Services and the ability to enhance service when possible
- Compliance with Title VI of the Civil Rights Act of 1964 (Title VI): benefits and services are provided without regard to race, color or national origin; also, disparate effects on low-income and minority populations
- Response to changes in the communities where services are provided

### Service Equity Analysis Requirements of Title VI of the Civil Rights Act

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of 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. The May 2023 service change proposal includes two major service changes out of 30 total changes. Thus, an analysis is required to be

brought before the Board for approval. The complete Title VI Service Equity Analysis report is included in Attachment A.

#### Title VI Service 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 the foundational requirements for evaluating service change proposals for equity. These policies and their applicable thresholds are listed below:

Major Service Change Policy: 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 12 or more months. All major service changes will be subject to an equity analysis.

#### Title VI Policies:

*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.

*Disproportionate Burden Policy:* A major service change should not adversely affect a low-income population 10% 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% of the Department of Health and Human Services Poverty Guidelines.

### **DISCUSSION**

Staff proposes changes to 24 bus routes and six rail lines in the forthcoming May 2023 runboard. Of these 30 changes, two services have proposed additions or reductions to service 25% greater than that of baseline service and thus meet established thresholds for a major service change. Those routes are shown in bold in the following table.

<b>Modified Services (20 services)</b> <i>(Additional trips, expanded service spans, increase reliability)</i>	0, 3L, <b>10</b> , 20, 28, 32, 34, 38, 52, 72, 169, 169L, <b>FF2</b> , FF5 D Line, E Line, H Line, N Line, R Line, W Line
<b>Seasonal Adjustments (10 services)</b>	11, 30, 51, 65, 73, 225, DASH, JUMP, SKIP, NB

Methodology: Disparate impact and disproportionate burden analyses were performed at the route/line level, route/line block group and network level to identify any potential disparities in service changes based on race/ethnicity or income.

#### Summary of Findings:

- Of the almost 88,000 people served by stops within the service area with major service changes, low-income populations represented a higher share of population than service area averages. Of this cumulative figure, nearly 50,000 would receive service improvements for equity populations.

- The two bus routes with major service changes serve above-average low-income populations.
- When considering the demographics within the service areas of routes with major service changes and as a proportion to the service area overall, low-income equity populations received a greater increase in service (i.e., were more positively impacted) compared to higher income populations. Low-income areas had a +1.67% benefit above higher income areas. Minority populations received a slightly lower increase in service (were positively impacted less) compared to non-minority populations. However, this difference did not meet the Disparate Impact threshold, therefore no system-level disparate impact was found with the proposed changes.

#### Conclusions:

Although one of the major service changes resulted in a potential disparate impact at the route level, Title VI concerns are minimal at the network level when comparing the service changes between the January 2023 and May 2023 runboards. In aggregate, a review of all routes/lines found no adverse impacts between equity and non-equity routes/lines. Overall, the system-wide service increases have positively impacted equity populations slightly more compared to non-equity populations. Therefore, no system-level disparate impact or disproportionate burden is found related to the proposed major service changes in the May 2023 service change proposal.

In adopting this report, the agency seeks to meet the 2021-2026 Strategic Plan priorities of Community Value, Customer Excellence, Employee Ownership, and Financial Success while maintaining compliance with Title VI federal regulations. RTD will continue to assess the equity implications for all subsequent service change proposals and will propose adjustments and service alternatives as appropriate in future service change recommendations.

#### **FINANCIAL IMPACT**

The adoption of the Title VI Service Equity Analysis will not result in any direct or foreseeable financial impacts.

#### **ATTACHMENTS:**

- Title VI Service Equity Analysis Report for May 2023 Runboard Proposal(PDF)
- May 2023 Service Equity Analysis Recommended Action - March 8, 2023 (PPTX)

<b>RESULT:</b>	<b>PASSED BY CONSENT VOTE [UNANIMOUS]</b>
<b>MOVER:</b>	Doug Tisdale, Director, District H
<b>SECONDER:</b>	Julien Bouquet, Director, District G
<b>AYES:</b>	Bouquet, Broom, Buzek, Catlin, Davidson, Dishell, Guissinger, Guzman, Harwick, Rosenthal, Sloan, Tisdale, Whitmore, Williams
<b>ABSENT:</b>	JoyAnn Ruscha


Prepared by:

Carl Green Jr., Director, Civil Rights

Approved by:

  
Carl Green Jr., Director, Civil Rights 2/27/2023

Authorized by:

  
Debra A. Johnson, General Manager and CEO 3/1/2023





# Title VI Service Equity Analysis: May 2023 Proposed Service Changes

May 2023

# Service Equity Analysis: May 2023

## Table of Contents

Executive Summary ..... 2

*Methodology* ..... 2

*Major Service Changes* ..... 2

*Findings* ..... 2

Introduction ..... 3

*Title VI and Environmental Justice* ..... 3

*Service Change Philosophy* ..... 3

*RTD's Title VI Equity Analysis Policies* ..... 4

Analysis ..... 5

*Data Sources and Methodology* ..... 5

*Public Outreach Overview* ..... 6

*Major Service Change, Disparate Impact and Disproportionate Burden Analysis* ..... 6

        Changes by Transit Mode ..... 7

*Major Service Change Review* ..... 7

        Major Service Change Reductions/Eliminations ..... 7

        Major Service Change Increases ..... 7

        Route- and Line-Level Analysis ..... 7

        Network Analysis ..... 10

Summary of Findings ..... 16

Appendix A: Systemwide Service Changes

Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores

# Service Equity Analysis: May 2023

## Executive Summary

This document summarizes the analysis of service changes between the January 2023 and May 2023 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 proposes changes to 24 bus route/patterns and six rail lines of RTD's forthcoming May 2023 runboard. Of these 30 changes, two services meet established thresholds for a major service change. The routes listed below have proposed adjustments to service that were greater than 25% of baseline service or services being eliminated.

<b>Service Adjustments (one service)</b>	<b>Route 10 – East 12th Street:</b> extend service to Colfax and Billings via 11th and Peoria and terminate westbound trips at Union Station
<b>Service Reinstatement (one service)</b>	<b>FF2 – Boulder Express:</b> Reinstate service on the FF2 (Boulder Express) with three trips in each direction

### Findings

Alterations to the proposed May 2023 service changes include extending the alignment of Route 10 and reinstatement of the FF2 Boulder Express pattern of the Flatiron Flyer. Of these routes, both serve high concentrations of low-income populations and Route 10 serves high concentrations of both minority and 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, low-income equity populations received a greater increase in service (i.e., were more positively impacted) compared to higher income populations. Low-income areas had a +1.67% benefit above higher income areas. Minority populations received a slightly lower increase in service (were positively impacted less) compared to non-minority populations. However, this difference did not meet the Disparate Impact threshold, therefore no system-level disparate impact was found with the proposed changes.

Finally, though there were no cumulative adverse impacts at the network level, a potential disparate impact was identified at the individual route-level: of the two routes/lines that had major service changes, FF2 had potential disparate impact finding but no disproportionate burden finding.

# Service Equity Analysis: May 2023

## Introduction

### Title VI and Environmental Justice

Equity is a core principle of RTD's functional mission to provide mass 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 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 January 2023 and May 2023 runboards. Routes with major service changes include one major increase and one reinstatement of a formerly suspended route pattern. These changes and all others have been reviewed individually at the route/line 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/lines, the elimination of existing routes/lines and changes to the alignment and trip frequency within existing routes/lines. RTD has established principles to identify the service changes needed to meet the diverse travel needs of those within the District and maintain a high-performance, sustainable transit system.

# Service Equity Analysis: May 2023

## RTD Service Changes Guiding Principles

- Service performance evaluation based on 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
- Compliance with 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
- 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 agency'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 agency 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.

*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% addition or reduction in the service hours of any route that would remain in effect for 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

# Service Equity Analysis: May 2023

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% 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% 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 and Methodology

Demographic data used for this analysis comes from the Census Bureau's American Community Survey (ACS) 5-Year Estimates for years 2017 to 2021 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 May 2023 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/line's quarter-mile service area. These proportional differences were compared against district population proportions of equity populations and route/line 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 three. 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 district boundaries.

Route/line 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).

# Service Equity Analysis: May 2023

RTD calculated the net change in service hours for each route/line 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

Three public meetings were conducted February 21-22, 2022. The comments collected on service changes during these meetings are summarized in the table below. In addition to the general outreach, the Transit Equity Office reached out to 68 community-based organizations and schools surrounding the routes/lines to inform and encourage community members to attend the open houses. Table 1 captures the meeting locations, dates, number of attendees and the common themes of attendees' comments pertaining to the three major service changes described in this analysis.

Table 1. Public meeting details

Date and Time   Location	Comment Themes	Number of Attendees
February 21 at 12 p.m.   Virtual	Two customers are excited to see the FF2 come back.	10
February 21 at 5:30 p.m.   Virtual	Customer wants more FF2 service than what is being proposed.	10
February 22 at 12 p.m.   Virtual	Customer very appreciative to have FF2 restored  Customer asked why Route 10 isn't ending at Del Mar Circle (was told no operator restroom available there)	14
		<b>Total – 34</b>

The public was also notified of the ability to submit comments to [service.changes@rtd-denver.com](mailto:service.changes@rtd-denver.com), by phone at 303-299-2004 and by fax 303-299-2227.

## Major Service Change, Disparate Impact and Disproportionate Burden Analysis

Proposed service changes for the May 2023 runboard that resulted in a 25% or greater change in service were categorized by equity population (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 2017-2021 ACS five-year demographic data.

A comparative, proportional equity analysis was completed to review the routes/lines individually. This analysis identified the equity and non-equity populations within a route/line service area and compared those against the equity and non-equity populations of the District. If impacted equity populations within the route/line service area received 10% or greater impacts compared to non-equity populations, the route/line 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.



# Service Equity Analysis: May 2023

## Major Service Change Test

Identify routes with proposed major service changes (annual trips) of 25% or more

### Changes by Transit Mode

As RTD continues to adapt to changes affected by the pandemic, 21 bus routes will undergo service changes. Of these, four routes will see an increase of **bus service by over 49 total weekday revenue service hours**. Changes to Route 10 exceeded the major service change threshold and FF2 is a reinstatement of previously suspended service; both account for almost 41 of the additional daily revenue service hours. Rail services will have service level adjustments to increase service to midnight.

Table 2. Summary of service changes by transit mode

Mode	Additional Daily Hours
All Rail	0
All Bus	49
Overall	49

## 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/lines prior to individual review of routes/lines, route/line 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

No major reductions/eliminations.

### Major Service Change Increases

Two bus routes had major service changes which include service increases of 25% or greater. This includes one modification to alignment on Route 10 and a reinstatement of a route pattern on the Flatiron Flyer. While below the percentage threshold, the reinstatement of service to pattern FF2 is considered a major service change and is therefore included in the review.

### Route- and Line-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/line individually to determine potential Disparate Impacts (DI) and/or Disproportionate Burdens (DB). 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

# Service Equity Analysis: May 2023

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/line with a major service change, determine the percent of the route's/line'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 DI or DB findings. For service increases, the following analysis examines the extent to which the benefits of the improvements are inclusive of minority and low-income populations. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual route follows, which includes further considerations of access to jobs, education, health care, food and social services for minority and low-income populations.

### Route 10 – East 12th Avenue

Proposal: Extend route into Aurora to Colfax Ave and Billings Street via 9th and 11th Avenues and Peoria Street. Headways between 9th Avenue and Clermont Street would be 60 minutes. All westbound trips would terminate at Denver Union Station.

As shown in Table 4, a higher percentage of the District's minority population stands to benefit from the proposed Major Service Increase as compared to non-minority population (2.41% vs. 2.11%, respectively). This difference does not exceed the 10% disparate impact threshold (1.90%). Therefore, a route-level disparate impact is not found. Moreover, a higher percentage of the District's low-income population stands to benefit from the proposed Major Service Increase as compared to higher population (3.30% vs. 2.06%, respectively). This difference does not exceed the 10% disparate impact threshold (1.85%). Therefore, a route-level Disproportionate Burden is not found.

Table 3. Route 10 Disparate Impact and Disproportionate Burden Analysis

East 12th Avenue				
January 2023 to May 2023 Service Change Analysis				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	40,614	27,197	52,995	14,184
District Statistics	1,922,542	1,126,534	2,576,564	429,175
District Total Base Population	3,049,076		3,005,739	
% of District Not Impacted	97.89%	97.59%	97.94%	96.70%
% District Impacted	2.11%	2.41%	2.06%	3.30%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB Thresholds Are 90% for service increases and 110% for service decreases	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.90%	2.41%	1.85%	3.30%

# Service Equity Analysis: May 2023

The maintenance of Route 10 existing service would maintain access to:

- About 154,224 jobs
  - 28% low-to-medium wage jobs, which is below the RTD District average (45%)
  - 14% jobs held by minorities, which is at the RTD District average (14%)
  - 15% jobs held by Hispanic/Latino workers, which is below the RTD District average (18%)
- 47 retail/convenience stores
- 66 human and social services centers
- 7 senior housing and facilities
- 27 college, high school, middle school, and elementary schools

The extension of Route 10 would provide new access to:

- About 34,615 jobs
  - 31% low-to-medium wage jobs, which is below the RTD District average (45%)
  - 17% jobs held by minorities, which is above the RTD District average (14%)
  - 15% jobs held by Hispanic/Latino workers, which is below the RTD District average (18%)
- 12 retail/convenience stores
- 7 human and social services centers
- 3 senior housing and facilities
- 22 college, high school, middle school, and elementary schools

## **Route FF2 (Boulder/Denver) – Boulder Express**

Proposal: Reinstate route pattern with three eastbound trips (7:07 a.m., 7:37 a.m. and 4:15 p.m. from Downtown Boulder Station) and three westbound trips (7:45 a.m., 4:45 p.m. and 5:20 p.m. from Denver Union Station).

As shown in Table 5, a lower percentage of the District's minority population stands to benefit from the proposed Major Service Increase as compared to non-minority population (0.81% vs. 0.40%, respectively). This difference does exceed the 10% disparate impact threshold (0.73%). Therefore, a potential route-level disparate impact is not found requiring further examination (i.e., access to key public service destinations, community engagement and network level analysis). However, a higher percentage of the District's low-income population stands to benefit from the proposed Major Service Increase as compared to higher population (0.93% vs. 0.51%, respectively). This difference does not exceed the 10% disparate impact threshold (0.46%). Thus, there is no Disproportionate Burden at the line-level.

# Service Equity Analysis: May 2023

Table 5. Route FF2 Disparate Impact and Disproportionate Burden Analysis

FF2 (Boulder/Denver) - Boulder Express				
January 2023 to May 2023 Service Change Analysis				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	15,634	4,534	13,222	3,998
District Statistics	1,922,542	1,126,534	2,576,564	429,175
District Total Base Population	3,049,076		3,005,739	
% of District Not Impacted	99.19%	99.60%	99.49%	99.07%
% District Impacted	0.81%	0.40%	0.51%	0.93%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI & DB thresholds are 90% for service increases & 110% for service decreases	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.73%	0.40%	0.46%	0.93%

The reinstatement of the FF2 pattern of the Flatiron Flyer would improve access to:

- About 43,880 jobs
  - 39% low-to-medium wage jobs, which is below the RTD District average (45%)
  - 12% jobs held by minorities, which is below the RTD District average (14%)
  - 14% jobs held by Hispanic/Latino workers, which is below the RTD District average (18%)
- 23 retail/convenience stores
- 28 human and social services centers
- 2 senior housing and facilities
- 12 college, high school, middle school, and elementary schools

## Network Analysis

In accordance with RTD's 2022 Title VI Program update, a network analysis is required in addition to route- and line-level analysis. A network level analysis provides further understanding of changes to service levels for Title VI protected populations at aggregate levels.

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, bus service was increased by over 49 weekday revenue hours.
- Of the almost 88,000 people served by stops within the service area with major service changes, low-income populations represented a higher share of population than District averages. Of this cumulative figure, nearly 50,000 would receive service improvements for equity populations.

# Service Equity Analysis: May 2023

- At the network level, equity routes and non-equity routes<sup>1</sup> were compared only for those with major service changes. The two bus routes with major service changes serve above-average low-income populations.

**In review of Routes 10 and FF2 at the network level, there are no potential disparate impact or disproportionate burden findings.**

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 2023 to May 2023 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 (14.3%) and minority population (36.9%).

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 2,197 block groups defined as being wholly within or mostly within the District<sup>2</sup>. Using the 2017-2021 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 36.9% was derived by using the base population of the service area (3.049 million) the low-income population percentage of 14.3% is derived from a slightly smaller population figure (3.005 million). This is due to the smaller population whose poverty status the Census Bureau can determine<sup>3</sup>. The thresholds summarized in **Error! Reference source not found.**<sup>6</sup> yielded 831 (38% of all) block groups above the district average for low-income population, and 830 (38%) block groups above the district average for minority population.

<sup>1</sup> Based on existence of the route within the January 2023 network and the population within a quarter mile of bus stops or rail stations. 2017-2021 5-Year ACS estimates were used for population identification.

<sup>2</sup> Some block groups are not completely contained within district boundaries due to differences in boundaries between the District and Census-defined geographies.

<sup>3</sup> 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.

# Service Equity Analysis: May 2023

Table 6. District averages; NTD 2018; ACS 2017-2021 5-Year estimates

Service Area (sq. mi.)	Total Block Groups	Total Population	Percent Minority	Total Population (assessed)	Percent Low-Income
2,342	2,197	3,049,076	36.9%	3,005,739	14.3%

The proposed major service changes were examined in aggregate by transit mode to determine overall impacts to underlying population. Table summarizes the change in service for block group population within one quarter mile of bus 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. No major changes were proposed for rail services with the May 2023 runboard.

Table 7. Systemwide disparate impact and disproportionate burden equity analysis summary for all bus major service changes

Systemwide Disparate Impact and Disproportionate Impact Analysis: All Bus				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	<b>56,249</b>	<b>31,730</b>	<b>66,217</b>	<b>18,182</b>
<b>District</b>	1,922,542	1,126,534	2,576,564	429,175
District Total	3,049,076		3,005,739	
% District Not Impacted	97.07%	97.18%	97.43%	95.76%
% District Impacted	<b>2.93%</b>	<b>2.82%</b>	<b>2.57%</b>	<b>4.24%</b>
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
DI & DB thresholds are 90% for service increases & 110% for service decreases	DI Threshold	Minority Pop Impacted	DB Threshold	Low Inc. Pop Impacted
	<b>2.63%</b>	<b>2.82%</b>	<b>2.31%</b>	<b>4.24%</b>

For system-level bus service changes, **non-minority populations stand to benefit slightly more than minority populations**, (2.93% vs. 2.82%, respectively). However, the difference does not meet the Disparate Impact Threshold of 2.63%. Therefore, no system-level disparate impact findings are found with the proposed major service changes. **Low-income populations stand to benefit more than higher income populations** (4.24% vs. 2.57% respectively), with low-income areas benefitting 1.67% more than higher income areas. Therefore, no system-level disproportionate burden is found with the proposed major service changes.

Figures 1 and 2 illustrate the locations of above average low-income and minority block groups within the District, as well as highlight the two bus routes with major service changes (orange). The Route 10 benefits low-income and minority populations, serving the 9th and 11th Avenue and Peoria Street corridors with a longer alignment and more connections into Aurora. The FF2 pattern of the Flatiron Flyer is currently suspended and is proposed to be reinstated with three trips in each direction/peak period.

# **Service Equity Analysis: May 2023**



# Service Equity Analysis: May 2023

## Service and Service Area with Low-Income Population

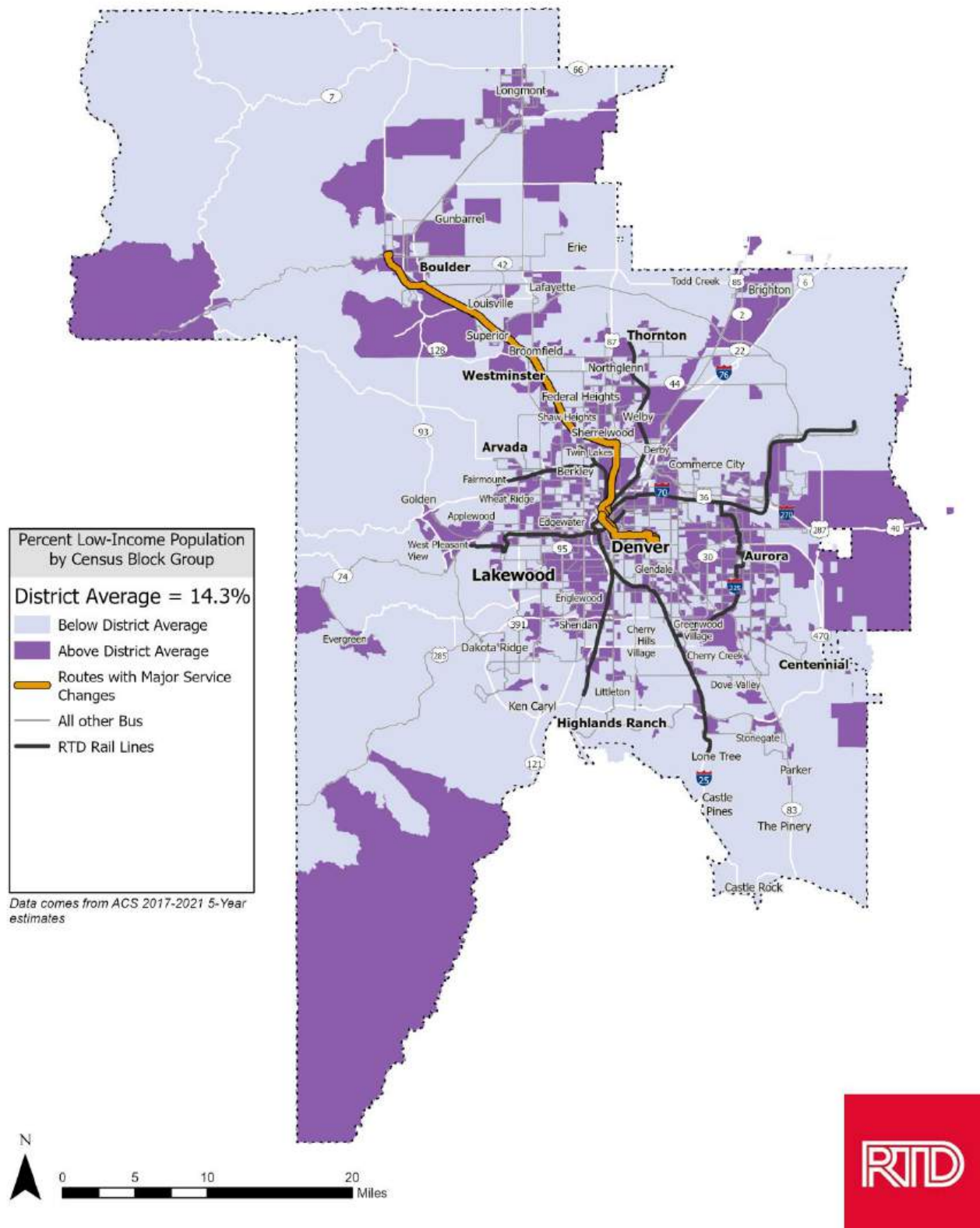


Figure 1. District block groups with above-average low-income population (red); US Census Bureau 2017-2021 5-Year Estimates

# Service Equity Analysis: May 2023

## Service and Service Area with Minority Population

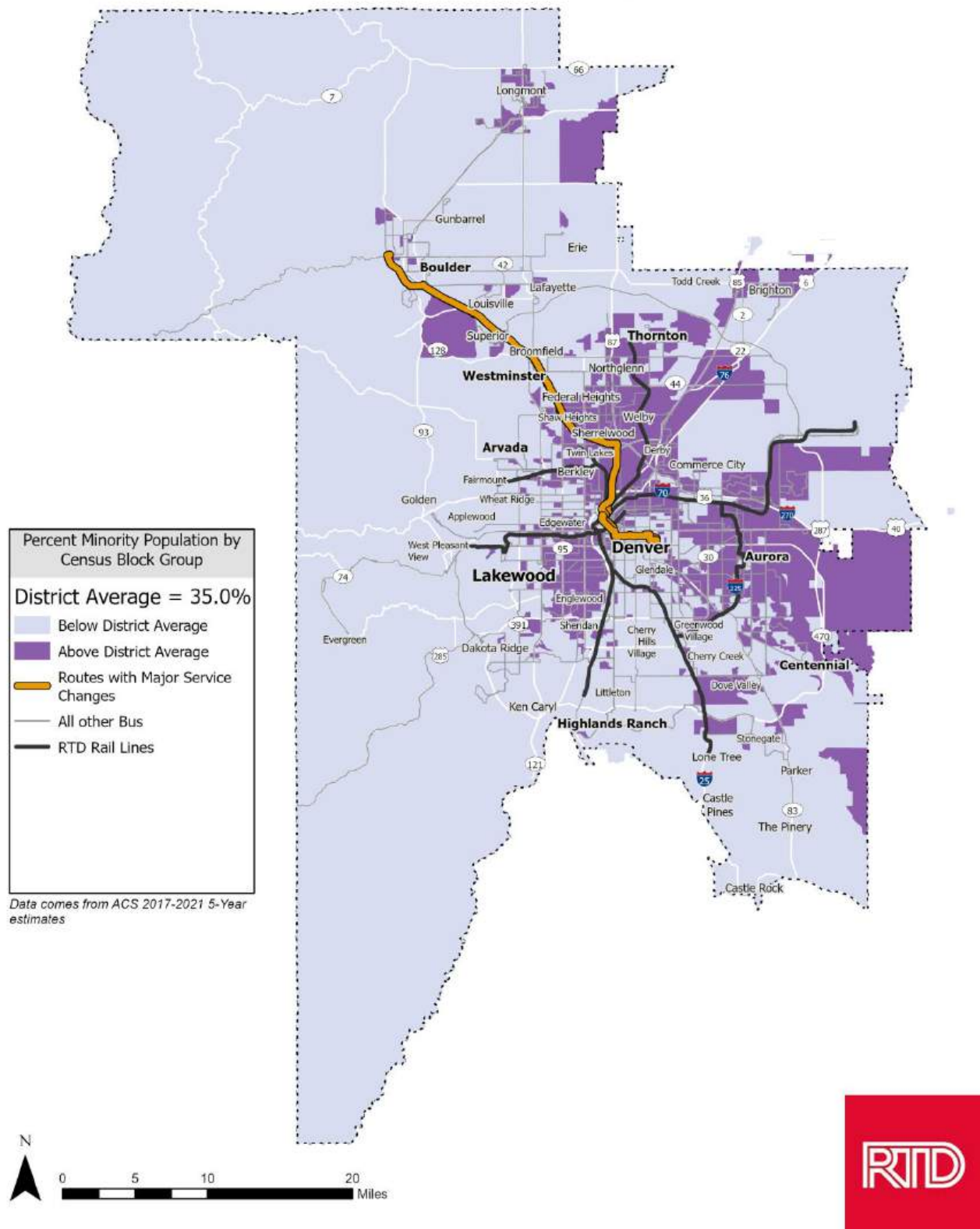


Figure 2. District block groups with above-average minority population (green); US Census Bureau 2017-2021 5-Year Estimates

# Service Equity Analysis: May 2023

The January 2023 to May 2023 service changes are captured in Figure 3. Depiction of route and segment changes by severity of change, s. This map provides a generalized view of where service is changing at the route pattern level. The January 2023 bus network is colorized according to the percentage change in service hours. The FF2 is shown in green (7% service change). The network also includes Route 10 in teal, representing significant modifications to its alignment and accompanying service hours (74%). All other bus routes, shown in gray, are programmed to undergo minimal (e.g., schedule adjustments, minor realignments) or no service changes in May 2023.

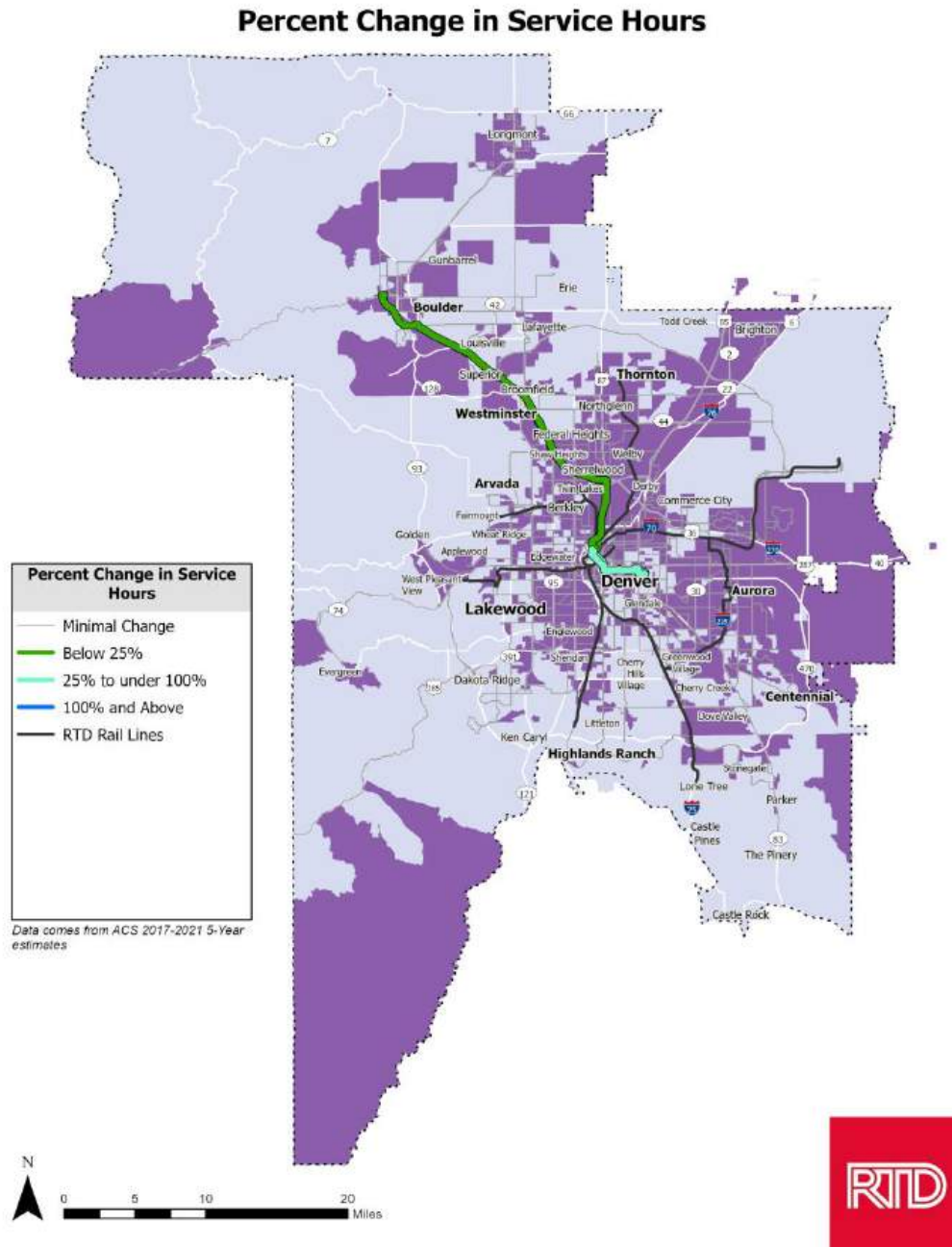


Figure 3. Depiction of route and segment changes by severity of change, January 2023 to May 2023

# Service Equity Analysis: May 2023

## Summary of Findings

The network changes that are proposed between January 2023 and May 2023 include modifications to service that include schedule adjustments, changes to summer schedules and trip availability, additional trips, and longer spans of service. The major service change increases were entirely invested in bus services. No major service reductions were included.

### Route-level Findings:

- Of the 30 total services with proposed changes, taken individually, **one had a potential disparate impact finding**.
- **Route FF2 has a potential disparate impact finding** due to minority populations receiving -0.33% less of a benefit than non-minority populations.
- Route 10 had no potential disparate impact and no disproportionate burden findings.

**Error! Reference source not found.**<sup>8</sup> 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 8. Summary of major service changes by change type and impact

Change Type	Number	Route	Potential Disparate Impact?	Potential Disproportionate Burden?	Service Change Pct
Service Increases	10	East 12th Street	No	No	74%
	FF2	FF2 (Boulder/Denver) – Boulder Express	Yes	No	7%

### 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:

- Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts/disproportionate burdens, or
- 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 May 2023 service changes<sup>4</sup> include adding improvements to Route 10 and FF2, both of which serve low-income populations at rates higher than the District average. These service changes signify the agency's commitment to ensure an equitable distribution of service improvements.

<sup>4</sup> <https://www.rtd-denver.com/service-changes/may-2023>

# Service Equity Analysis: May 2023

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 May 2023 service changes proposal.

## Systemwide-level Findings:

- Of the almost 88,000 people with access to bus stops within the service area of the bus routes with a major service improvement (Routes 10 and FF2), low-income groups represented a higher share of the population than district averages, indicating targeted services to low-income populations.
- When considering the demographics within the service areas of the bus routes with a major service change and as a proportion to the District overall, **low-income populations received a greater increase in service (were positively impacted more) compared to higher income populations.** Low-income areas benefited +1.67% more compared to higher-income areas. Additionally, **minority populations received a slightly lower increase in service (were positively impacted less) compared to non-minority populations.** However, this difference did not meet the Disparate Impact threshold, therefore no system-level disparate impact was found with the proposed changes.



# Service Equity Analysis: May 2023

## Appendix A: Systemwide Service Changes

Change Type	Service Changes	
	Route	Description
<b>Modified</b>	0	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	3L	Perform a running time analysis to improve on-time performance of the route.
	10	In accordance with the RTD Board-approved System Optimization Plan (SOP), extend route to Aurora at Colfax Ave and Billings St via 11th Ave and Peoria St. Headways on new alignment at 60 minutes. Existing headways maintained on 9th Ave and Clermont Rd pattern. All westbound trips terminate at Union Station.
	20	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed. Additionally, school tripper would be discontinued for summer.
	28	Minor schedule adjustments.
	32	Minor schedule adjustments.
	34	Merge with Route 38 at 30th/Downing Stn to create new Route 38 - 38th Ave Crosstown. Discontinue service at stops #19044 and #10945.
	38	Merge with Route 34 at 30th/Downing Stn to create new Route 38 - 38th Ave Crosstown. Eastbound routing on Stout from 17th to 32nd, R - Downing, R - California, enter station and continue on former Route 34.
	169	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	169L	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	FF2	Reinstate FF route pattern. Add 3 eastbound Boulder Express trips at 7:07 a.m., 7:37 a.m., and 4:15 p.m. from Downtown Boulder Station and 3 westbound trips at 7:45 a.m., 4:45 p.m., and 5:20 p.m. from Union Station.
	FF5	Add 6:30 a.m. eastbound trip from Downtown Boulder Station to Anschutz Campus and shift current 7:30 a.m. trip to 7:50 a.m..
	D Line	Reduce service to 30 minutes between 6:30 to 8 p.m., Mondays through Thursdays and Sundays and extend span to midnight. Reduce Friday service to 30 minutes between 7:30 p.m. and 9 p.m. and extend span to 2 a.m. Reduce Saturday service to 30 minutes between 8 a.m. and 10 a.m. and between 7 p.m. and 8 p.m. and extend span to 2 a.m.
	E Line	Extend span on 30-minute headways to midnight Mondays through Thursdays. Reduce Sunday service to 30 minutes between 8 a.m. to 10 a.m. and extend span to midnight.

# Service Equity Analysis: May 2023

Change Type	Service Changes	
	Route	Description
<b>Seasonal Adjustments</b>	H Line	Reduce service to 30 minutes between 6:30 p.m. to 9 p.m. weekdays and 6 p.m. and 9 p.m. on weekends. Extend span to midnight Mondays through Thursdays and Sunday. Extend span to 2 a.m. on Fridays and Saturdays.
	R Line	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	W Line	Extend span to midnight weekdays. Reduce service to 30 minutes 8 a.m. to 10 a.m. Sundays.
	11	Seasonal adjustment, discontinuing school tripper for summer
	30	Seasonal adjustment, discontinuing school tripper for summer
	51	Seasonal adjustment, discontinuing school tripper for summer
	65	Seasonal adjustment, discontinuing school tripper for summer
	73	Seasonal adjustment, discontinuing school tripper for summer
	225	Seasonal adjustment, reducing weekday frequency for summer
	DASH	Seasonal adjustment, reducing weekday frequency for summer
	JUMP	Seasonal adjustment, reducing weekday frequency for summer
	NB	Seasonal adjustment, short turns at Nederland H.S. due to Eldora ski resort not being in operation.
	SKIP	Seasonal adjustment, reducing weekday frequency for summer





## **Appendix B: Analysis of Impact on Access to Employment, Social Services, Senior Housing & Facilities, Schools, Retail and Convenience Stores**

# Service Equity Analysis: May 2023

## Route 10 – East 12th Avenue Extension to Colfax Ave/Billings St via 11th Avenue and Peoria Street

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
Maintain Access	Maintains access to an estimated 154,224 jobs <div><div>Low/Medium Wage Jobs* Route 10 28% District 45%</div><div>Jobs Held by Workers of Color* Route 10 14% District 14%</div><div>Jobs Held by Hispanic/Latino Workers* Route 10 15% District 18%</div><div>Route 10 District</div></div>	146	66	6	9	2	2	14	24	23
New Access	Creates access to an estimated 24,615 jobs <div><div>Low/Medium Wage Jobs* Route 10 31% District 45%</div><div>Jobs Held by Workers of Color* Route 10 17% District 14%</div><div>Jobs Held by Hispanic/Latino Workers* Route 10 15% District 18%</div><div>Route 10 District</div></div>	44	7	3	12	6	3	1	4	8

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2019.

# Service Equity Analysis: May 2023

## Route FF2 – Boulder Express

Reinstatement of FF2 pattern with 3 trips in each peak period

	Employment	Total POI	Social Services	Senior Housing & Facilities	Elementary Schools	Middle Schools	High Schools	Colleges	Retail (Includes Grocery)	Convenience Stores
New Access	Creates access to an estimated 43,880 jobs	65	28	2	7	0	2	3	15	8
<div> <div>Low/Medium Wage Jobs*</div> <div>Jobs Held by Workers of Color*</div> <div>Jobs Held by Hispanic/Latino Workers*</div> </div> <div> <div>FF2</div> <div>District</div> </div>		<div> <div>39%</div> <div>45%</div> </div> <div> <div>12%</div> <div>14%</div> </div> <div> <div>14%</div> <div>18%</div> </div>								

\* Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone." Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau, 2019.



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# May 2023 Runboard Service Equity Analysis

Carl Green Jr., Director, Civil Rights

# Overview

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- § Proposed Service Changes Summary
- § Federal Transit Administration (FTA) Requirements
- § Title VI and Service Equity Analysis Overview
- § Title VI Policies
- § Methodology
- § Route and Network Analysis and Conclusions
- § Public Outreach Overview
- § Recommendation

## Proposed Service Changes Summary

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<b>Modified Services</b> (20 services)	0, 3L, 10, 20, 28, 32, 34, 38, 52, 72, 169, 169L, FF2, FF5 D Line, E Line, H Line, N Line, R Line, W Line
<b>Seasonal Adjustments</b> (10 services)	11, 30, 51, 65, 73, 225, DASH, JUMP, SKIP, NB



# FTA Requirements for Service Changes

Proposed May 2023 Service Changes



## Title VI of the Civil Rights Act of 1964

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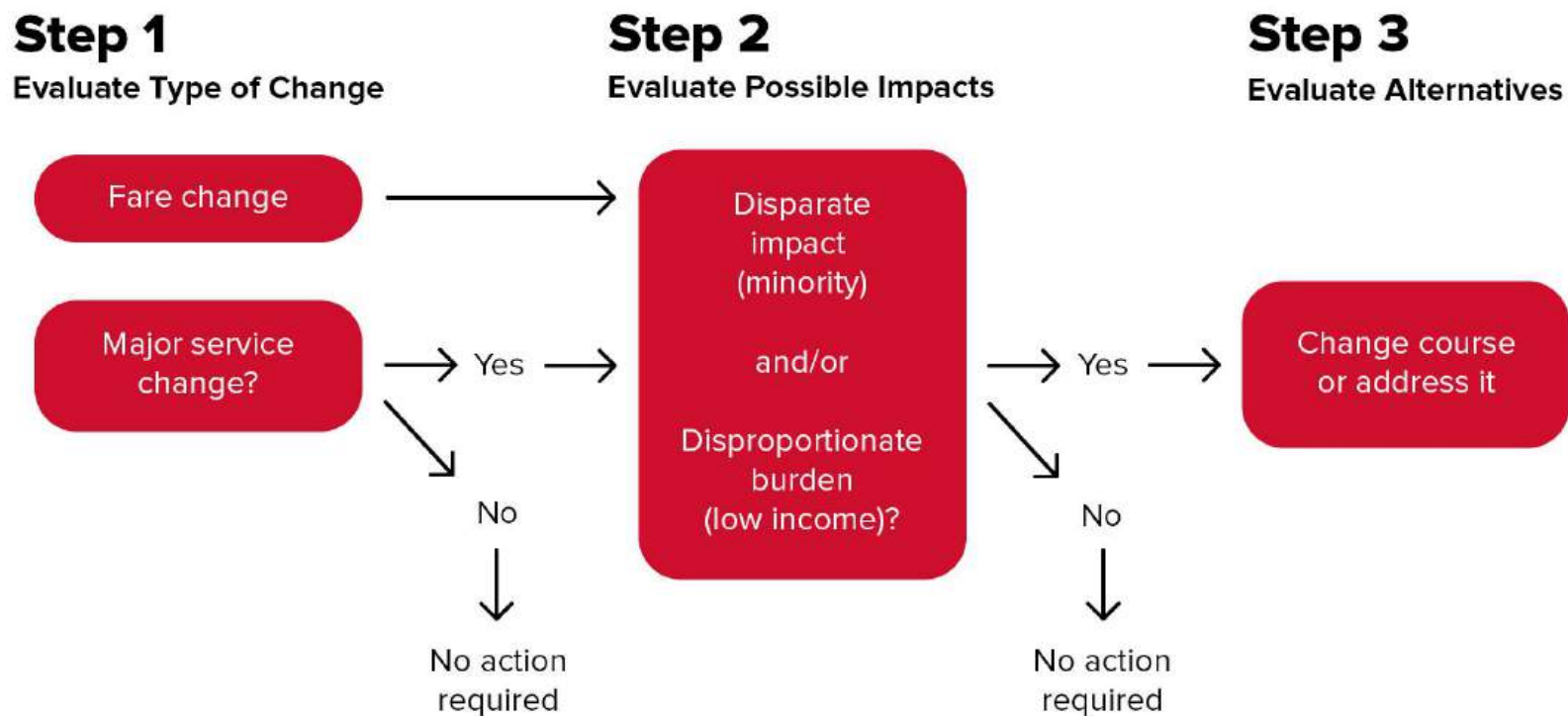


"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

FTA Circular 4702.1B *Title VI Requirements and Guidelines* and RTD Title VI Program

# Title VI Equity Analysis Overview

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Minority and Low-Income = Equity Populations



# Title VI Policies

Major Service Change, Disparate Impact and Disproportionate Burden Policies

# Major Service Change Policy

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## Definition:

§ 25% + or - in the service hours of any route that would remain in effect for 12+ months

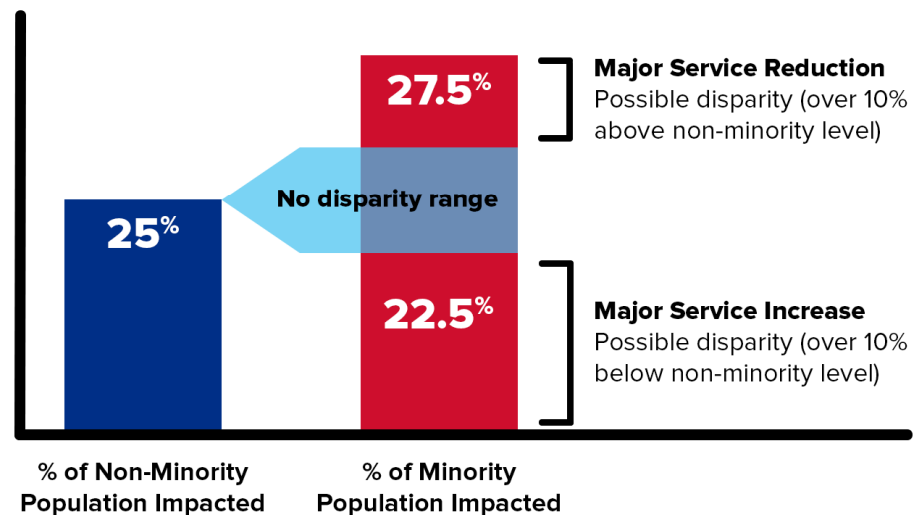
## Major Service Change Results:

§ Increases – two out of 30 met the major service change threshold

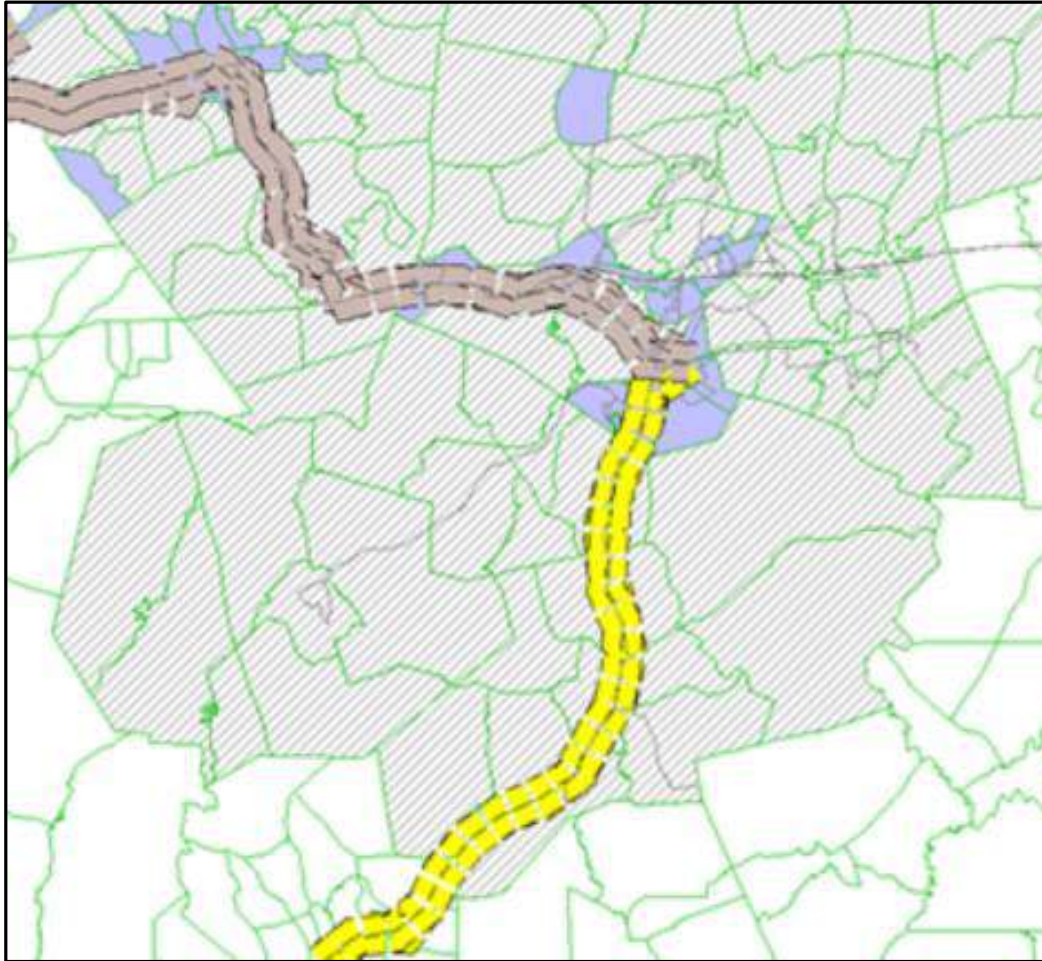
# Disparate Impact and Disproportionate Burden Policies

Title VI Policies  
=  
Thresholds to  
Evaluate Possible Impacts

## Testing for Disparate Impact at the System Level



Threshold Calculation: 10% of 25% (non-minority) = 2.5%



1/4-mile route buffer around a route

## Methodology

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1. Route-level analysis applied
2. Network analysis applied

# Route Level Results

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## §Route 10

- No potential disparate impact or disproportionate burden

## §Route FF2

- Potential disparate impact and no disproportionate burden

# Key Public Service Destinations Assessment

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**Retail and  
Convenience  
Stores**



**Schools  
PreK -  
College**



**Social  
Services**



**Senior  
Housing**



**Jobs**



## Key Public Service Destinations – Route 10

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Maintains Access	Total	New Access	Total
Jobs	154,224	Jobs	34,615
Grocers	47	Grocers	12
Social Service Centers	66	Social Service Centers	7
Senior Housing	7	Senior Housing	3
Academic Institutions	27	Academic Institutions	22

## Key Public Service Destinations – FF2

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Improved Access	Total
Jobs	43,880
Grocers	23
Social Service Centers	28
Senior Housing	2
Academic Institutions	12

# Public Outreach Overview

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§ Open houses held February 21-22, 2023

§ Community-based organizations/key public service destinations direct outreach

## Network Level Results

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§ Minority populations received slightly lower increase in service (were positively impacted less) compared to non-minority populations

- 0.11% less for minority groups (2.82% vs. 2.93% non-minority)
- Difference does not meet Disparate Impact threshold (2.63%)

§ Low-income populations receive greater service increase service (positively impacted more) compared to non-low-income populations

- +1.67% more for low-income groups

## Conclusion

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- § Serve above-average low-income populations compared to service area average (14.3%)
- § Equity populations were positively impacted slightly more compared to non-equity populations
- § No system-level adverse impacts

## Recommendation

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§ May 2023 Title VI service equity analysis approval

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# **RTD 2025-2028 Title VI Program**

## **Attachment U: January 2023 Service Equity Analysis**

DRAFT



# BOARD OF DIRECTORS REPORT

## January 2023 Title VI Service Equity Analysis

Committee Meeting Date:
October 12, 2022
Board Meeting Date:
October 25, 2022

### RECOMMENDED ACTION

For the Board of Directors to adopt the Title VI Service Equity Analysis report for January 2023 service changes to comply with federal laws, regulations and guidelines related to Title VI of the Civil Rights Act of 1964 as well as to meet the 2021-2026 Strategic Plan priority of Community Value.

### STAFF REPRESENTATIVE

Carl Green Jr., Interim Director, Civil Rights

Jessie Carter II, Senior Manager, Service Planning and Scheduling

### PRESENTATION LENGTH

15 minutes

### BACKGROUND

The 26 service changes proposed for January 2023 provides opportunities for bus and rail operators to vote new work assignments and for the Service Development Division to adjust the overall operations plan for the transit network. Additionally, with the Board-adopted Reimagine RTD System Optimization Plan (SOP), several of the service change proposals reflect the first phases of SOP implementation to provide the best possible customer value.

The Board-adopted guidance for proposed service changes continues to be:

- Service performance evaluation based on service standards
- Maintaining the overall integrity of the transit network and on transit dependent markets
- Making alternative services available to affected customers
- Cost-effective distribution throughout the District and Family of Services and the ability to enhance service when possible
- Compliance with 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
- Response to changes in the communities where services are provided

### Service Equity Analysis Requirements of Title VI of the Civil Rights Act

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of 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. The January 2023 service change proposal includes four major service changes out of 26 total changes. Thus, an analysis is

required to be brought before the Board for approval. The complete Title VI Service Equity Analysis report is included in Attachment A.

### **Title VI Service 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 the foundational requirements for evaluating service change proposals for equity. These policies and their applicable thresholds are listed below:

Major Service Change Policy: 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 12 or more months. All major service changes will be subject to an equity analysis.

#### Title VI Policies:

**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.

**Disproportionate Burden Policy:** A major service change should not adversely affect a low-income population 10% 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% of the Department of Health and Human Services Poverty Guidelines.

### **DISCUSSION**

Staff proposes changes to 18 bus routes and eight rail lines in the forthcoming January 2023 runboard. Of these 26 changes, four services have proposed additions or reductions to service 25% greater than that of baseline service and thus meet established thresholds for a major service change. Those routes are shown in bold in the following table.

<b>Modified Services (23 services)</b> <i>(Additional trips, expanded service spans)</i>	11, 12, 15, 15L, 21, 24, <b>30</b> , 42, 44, 76, 83D/83L, 88, 93L, 130, AT, 228, BOLT  D Line, E Line, H Line, L Line, R Line, W Line
<b>Reduced Services (one service)</b>	120L
<b>Discontinued Services (two services)</b>	<b>C Line, F Line</b>

#### Methodology

Disparate impact and disproportionate burden analyses were performed at the route/line level, route/line block group and network level to identify any potential disparities in service changes based on race/ethnicity or income.

## Summary of Findings

- Of the over 63,000 people served by stops within the service area with major service changes (both bus and rail), minority and low-income populations represented a higher share of population than district averages. Of this cumulative figure, 33,000 would receive service improvements for equity populations
- The one bus route with major service changes serves above-average minority or low-income populations
- For major service changes to rail service, minority populations are not disproportionately impacted by the elimination of service to the C and F lines; however, the burden on low-income populations relative to higher income populations slightly exceeds the threshold
- Although staff is proposing that the C and F lines be permanently discontinued, all stations currently served by the C and F lines will continue to be served by rail service at 15-minute peak headways. More specifically:
  - The stations served prior to the discontinuation of the C Line will continue to be served by the D Line, with transfers at I-25●Broadway Station to either the W or E line required to continue to Denver Union Station
  - The stations served prior to the discontinuation of the F Line will continue to be served by the E Line, with transfers at I-25●Broadway Station to either the D or H Line required to continue to 18th●Stout Station
  - These service changes signify the agency's commitment to ensure an equitable distribution of service improvements and to minimize impacts with the permanent discontinuance of these light rail lines
- When considering the demographics within the service areas of lines/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 (i.e., were more positively impacted) compared to non-equity populations; minority areas had a +1.84% benefit above non-minority areas, and low-income areas received a +1.67% compared to higher income areas

## Conclusions

Although two of the major service changes resulted in a disproportionate burden at the line level, Title VI concerns are minimal at the network level when comparing the service changes between the August 2022 and January 2023 runboards. In aggregate, a review of all routes/lines found no adverse impacts between equity and non-equity routes/lines. Overall, the system-wide service increases have positively impacted equity populations slightly more compared to non-equity populations. Therefore, no system-level disparate impact or disproportionate burden is found related to the proposed major service changes in the January 2023 service change proposal.

In adopting this report, the agency seeks to meet the 2021-2026 Strategic Plan priority of Community Value while maintaining compliance with Title VI federal regulations. RTD will continue to assess the equity implications for all subsequent service change proposals and will propose adjustments and service alternatives as appropriate in future service change recommendations.

#### **FINANCIAL IMPACT**

The adoption of the Title VI Service Equity Analysis will not result in any direct or foreseeable financial impacts.

#### **ATTACHMENTS:**

- Title VI Service Equity Analysis Report for January 2023 Runboard Proposal (DOCX)
- January 2023 Service Equity Analysis Recommended Action Item 10-12 from MinuteTraq (PPTX)

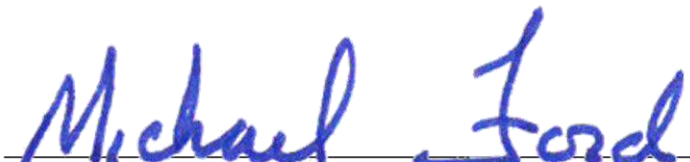
<b>RESULT:</b>	<b>ADOPTED BY CONSENT VOTE [14 TO 0]</b>
<b>MOVER:</b>	Peggy Catlin, Director, District N
<b>SECONDER:</b>	Bob Broom, Director, District F
<b>AYES:</b>	Broom, Buzek, Catlin, Cook, Davidson, Dishell, Guissinger, Lewis, Rivera-Malpiede, Rosenthal, Sloan, Tisdale, Whitmore, Williams
<b>AWAY:</b>	Julien Bouquet

Prepared by:

Carl Green Jr., Director, Civil Rights

Jessie Carter, Senior Manager of Service Development

Approved by:

  
Michael Ford, Chief Operations Officer 9/30/2022

Authorized by:

  
Debra A. Johnson, General Manager and CEO 10/5/2022



# **Title VI Service Equity Analysis: January 2023 Proposed Service Changes**

**September 2022**

# Service Equity Analysis: January 2023

## Table of Contents

Executive Summary.....2

*Methodology*.....2

*Major Service Changes*.....2

*Findings*.....2

Introduction.....3

*Title VI and Environmental Justice*.....3

*Service Change Philosophy*.....3

*RTD’s Title VI Equity Analysis Policies*.....4

Analysis.....5

*Data Sources and Methodology*.....5

*Public Outreach Overview*.....6

*Major Service Change, Disparate Impact and Disproportionate Burden Analysis*.....6

        Changes by Transit Mode .....7

*Major Service Change Review*.....7

        Major Service Change Reductions/Eliminations.....7

        Major Service Change Increases .....8

        Route- and Line-Level Analysis.....8

        Network Analysis.....8

Summary of Findings .....15

Appendix A: Systemwide Service Changes .....17

*Table A-1*.....17

Appendix B: Route Analysis Tables.....19

*Major Service Changes*.....19

        BUS .....19

        RAIL .....19

# Service Equity Analysis: January 2023

## Executive Summary

This document summarizes the analysis of the service changes between the August 2022 and January 2023 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 proposes changes to 18 bus route/patterns and eight rail lines of RTD's forthcoming January 2023 runboard. Of these 26 changes, three services meet established thresholds for a major service change. The routes/lines listed below have proposed adjustments to service that were greater than 25% of baseline service or services being eliminated.

<b>Service Adjustments (one service)</b>	<b>Route 30 – South Federal:</b> extend span of service weekdays and Sundays in bi-directional pattern
<b>Service Eliminations (two services)</b>	<b>C Line:</b> regular service on the C Line is discontinued <b>F Line:</b> regular service on the F Line is discontinued

### Findings

Alterations to the initial proposed January 2023 service changes include adding improvements to Route 30, which serves high concentrations of equity populations. Further, though staff is proposing that the C and F Lines be permanently discontinued, all stations currently served by the C and F Lines will continue to be served by rail service at 15-minute peak headways. The stations served prior to the discontinuation of the C Line will continue to be served by the D Line, with transfers at I-25•Broadway Station to either the W or E Line required to continue to Denver Union Station. Moreover, the stations served prior to the discontinuation of the F Line will continue to be served by the E Line, with transfers at I-25•Broadway Station to either the D or H Line required to continue to 18th•Stout Station. These service changes signify the agency's commitment to ensure an equitable distribution of service improvements and to minimize impacts with the permanent discontinuance of these rail lines.

# Service Equity Analysis: January 2023

When considering the demographics within the service areas of routes/lines 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 (i.e., were more positively impacted) compared to non-equity populations. Minority areas had a +1.84% benefit above non-minority areas, and low-income areas received a +1.67% compared to higher income areas. For major service changes to rail service, minority populations are not disproportionately impacted by the elimination of service to the C and F Lines; however, the burden on low-income populations relative to higher income populations slightly exceeds the threshold.

Finally, though there were no cumulative adverse impacts at the network level, potential disparate impacts and disproportionate burdens were identified at the individual route-level: of the three routes/lines that had major service changes, two lines had a disproportionate burden finding.

## Introduction

### Title VI and Environmental Justice

Equity is a core principle of RTD's functional mission to provide mass 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 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 August 2022 and January 2023 runboards. Routes with major service changes include one major increase and two major service decreases (eliminations) of formerly suspended routes. These changes and all others have been reviewed individually at the route/line 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/lines, the elimination of existing routes/lines and changes to the



# Service Equity Analysis: January 2023

alignment and trip frequency within existing routes/lines. RTD has established principles to identify the service changes needed to meet the diverse travel needs of those within the District and maintain a high-performance, sustainable transit system.

## RTD Service Changes Guiding Principles

- Service performance evaluation based on 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
- Compliance with 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
- 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 agency'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 agency 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.

*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

# Service Equity Analysis: January 2023

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% addition or reduction in the service hours of any route that would remain in effect for 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% 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% 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 and 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 January 2023 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/line's quarter-mile service area. These proportional differences were compared against district population proportions of equity populations and route/line 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 three. 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 district boundaries.

# Service Equity Analysis: January 2023

Route/line 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/line 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

Three public meetings were conducted September 26-27, 2022. The comments collected on service changes during these meetings are summarized in the table below. In addition to the general outreach, the Transit Equity Office reached out to 10 community-based organizations and schools surrounding the routes/lines to inform and encourage community members to attend the open houses. Table 1 captures the meeting locations, dates, number of attendees and the common themes of attendees’ comments pertaining to the three major service changes described in this analysis.

Table 1. Public meeting details

Date and Time   Location	Comment Themes	Number of Attendees
September 26 at 12 p.m.   Virtual	No attendee comments regarding the three major service changes	11
September 27 at 12 p.m.   Virtual	Clarification sought on rational behind dropping C and F Lines; encouragement to maintain C Line to access downtown area, ease commuting and reduce need for transfer; concern about transferring from C Line without increased service on D Line	8
September 27 at 6 p.m.   Virtual	Concern expressed regarding recruiting operators to support Route 30 and the C and F Lines	9
		Total – 28

The public was also notified of the ability to submit comments to [service.changes@rtd-denver.com](mailto:service.changes@rtd-denver.com), by phone at 303-299-2004 and by fax 303-299-2227.

## Major Service Change, Disparate Impact and Disproportionate Burden Analysis

Proposed service changes for the January 2023 runboard that resulted in a 25% or greater change in service were categorized by equity population (minority or non-minority, low-income or higher income) for comparison.

# Service Equity Analysis: January 2023

Routes were categorized as either equity or non-equity based on their identification within the prior network using 2018 ACS five-year demographic data.

A comparative, proportional equity analysis was completed to review the routes/lines individually. This analysis identified the equity and non-equity populations within a route/line service area and compared those against the equity and non-equity populations of the District. If impacted equity populations within the route/line service area received 10% or greater impacts compared to non-equity populations, the route/line 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

As RTD continues to adapt to changes affected by the pandemic, nearly 19 bus routes will undergo service changes. Of these, five routes will see an increase of **bus service by 56 daily revenue service hours (56 weekday, 28 Saturday, 37 Sunday)**. One of the routes, Route 30, exceeded the major service change threshold and account for 16 of the additional daily revenue service hours. The suspended C and F Lines will be permanently removed from service.

Table 2. Summary of service changes by transit mode

Mode	Additional Daily Hours
All Rail	0
All Bus	56
Overall	56

## 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/lines prior to individual review of routes/lines, route/line 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

Two rail lines were previously suspended during the COVID-19 service reductions. The Board of Directors approved these suspensions during the April 2021 monthly meeting. The January 2023 service proposal includes the permanent discontinuance or elimination of these lines.

# Service Equity Analysis: January 2023

## Major Service Change Increases

One bus route had major service changes, which includes service increases of 25% or greater. This includes one modification to span of service (Route 30).

## Route- and Line-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/line individually to determine potential Disparate Impacts (DI) and/or Disproportionate Burdens (DB). 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/line with a major service change, determine the percent of the route's/line'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 DI or DB findings. In summary, the review of these adverse impacts determined the following:

- **Two lines met the threshold for a potential Disproportionate Burden**

A complete listing of all potential DI and DB findings can be found in Appendix B.

## Network Analysis

In accordance with RTD's 2022 Title VI Program update, a network analysis is required in addition to route- and line-level analysis. A network level analysis provides further understanding of changes to service levels for Title VI protected populations at aggregate levels.

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, bus service was increased by over 56 daily revenue hours
- Of the over 63,000 people served by stops within the service area with major service changes (both bus and rail), minority and low-income populations represented a higher share of population than district averages. Of this cumulative figure, 33,000 would receive service improvements for equity populations.

# Service Equity Analysis: January 2023

- At the route level, equity routes and non-equity routes<sup>1</sup> were compared only for those with major service changes. The one bus route with major service changes serves above-average minority or low-income populations

**In review of Route 30, there are no adverse impacts. In review of all rail Lines (C Line and F Line), there were no adverse impacts for minority populations at the network level. However, there is a potential disproportionate burden for low-income populations when aggregating the proposed changes to all rail lines.**

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 August 2022 to January 2023 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 District<sup>2</sup>. 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 determine<sup>3</sup>. The thresholds summarized in **Error! Reference source not found.**<sup>4</sup> 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.

<sup>1</sup> Based on existence of the route within the August 2022 network and the population within a quarter mile of bus stops or rail stations. 2018 5-Year estimates were used for population identification.

<sup>2</sup> Some block groups are not completely contained within district boundaries due to differences in boundaries between the District and Census-defined geographies.

<sup>3</sup> 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.

# Service Equity Analysis: January 2023

Table 3. 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%

The proposed major service changes were examined in aggregate to determine overall impacts to underlying population. Table 4 summarizes the change in service for block group population within one quarter mile of bus or rail 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. Table 5 summarizes the change in rail service using the same methodology.

Table 4. Systemwide disparate impact and disproportionate burden equity analysis summary: Bus Route 30

Systemwide Disparate Impact and Disproportionate Impact Analysis: Bus				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,050	25,173	23,323	12,548
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%	97.6%	99.1%	97.5%
% District Impacted	0.57%	2.35%	0.94%	2.52%
Thresholds	Disparate Impact (DI)		Disproportionate Burden (DB)	
DI and DB Thresholds Are 90% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	0.51%	2.35%	0.85%	2.52%

**For bus service, equity populations stand to benefit more than non-equity populations**, with minority populations benefitting 1.84% more than non-minority population and low-income populations benefitting 1.67% more than higher-income populations. For major service changes to rail service, minority populations are not disproportionately impacted by the elimination of service to the C and F Lines; however, the burden on low-income populations relative to higher income populations slightly exceeds the threshold.



# Service Equity Analysis: January 2023

Table 5: Systemwide disparate impact and disproportionate burden equity analysis summary: Rail Lines C and F

Systemwide Disparate Impact and Disproportionate Impact Analysis: Rail				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
<b>Route Service Area Impacted</b>	19,974	7,686	20,305	5,628
<b>District</b>	1,949,880	1,069,337	2,475,594	498,433
District Total	3,019,217		2,974,027	
% District Not Impacted	99.0%	99.3%	99.2%	98.9%
% District Impacted	1.02%	0.72%	0.82%	1.13%
<b>Thresholds</b>	<b>Disparate Impact (DI)</b>		<b>Disproportionate Burden (DB)</b>	
DI and DB Thresholds Are 110% Non-Equity % District Impacted Population	DI Threshold	Min Pop Impacted	DB Threshold	L-I Pop Impacted
	1.13%	0.72%	0.90%	1.13%

Figures 1 and 2 illustrate the locations of above average low-income and minority block groups within the District, as well as highlight the one bus route and two rail lines with major service changes (orange). The Route 30 benefits equity populations, serving Federal Blvd with longer hours throughout weekdays and Sundays. The C and F Lines are currently suspended and are proposed to be permanently discontinued. However, all stations currently served by the C and F Lines will continue to be served by rail service at 15-minute peak headways.



# Service Equity Analysis: January 2023

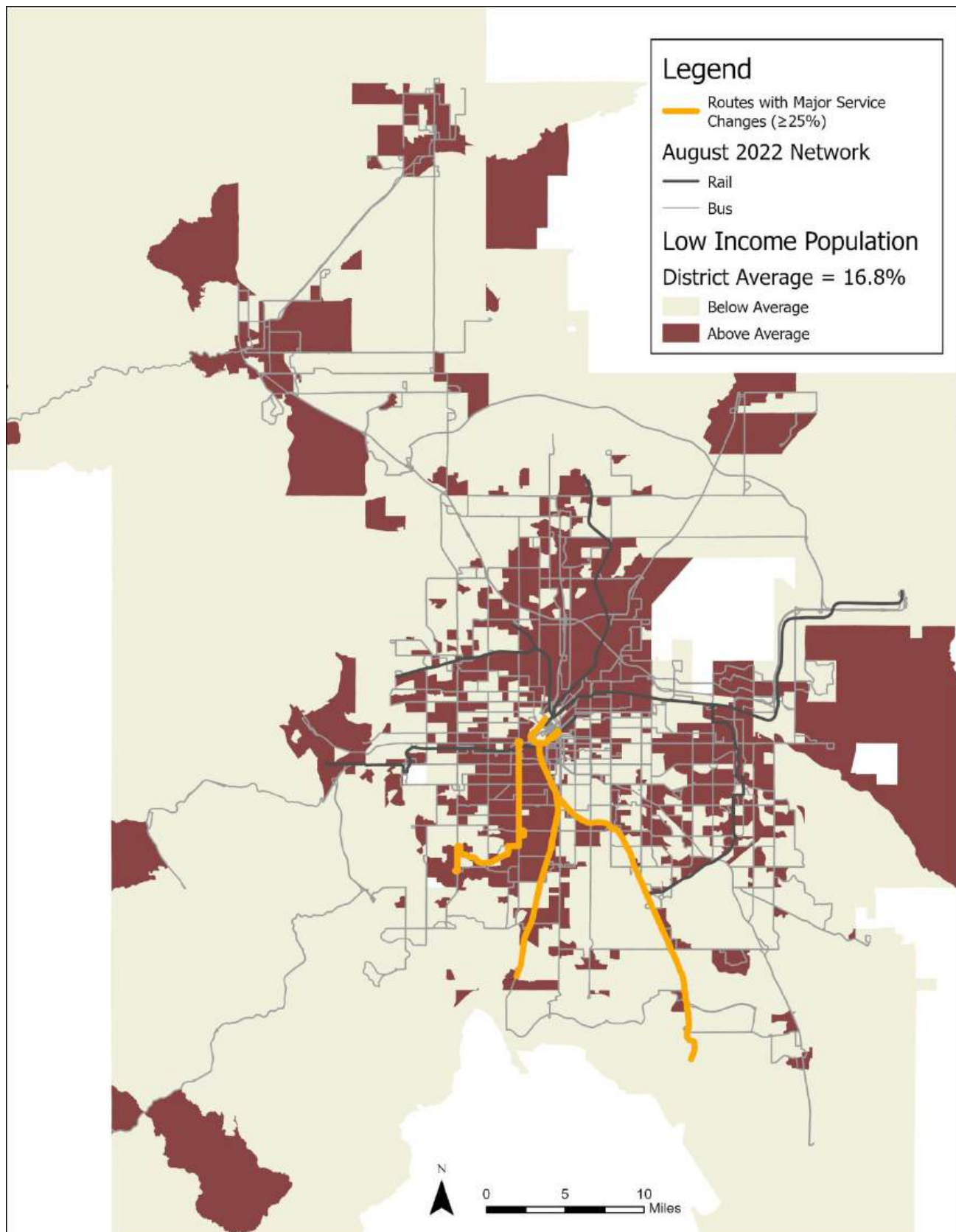


Figure 1. District block groups with above-average low-income population (red); US Census Bureau 2014-2018 5-Year Estimates

# Service Equity Analysis: January 2023

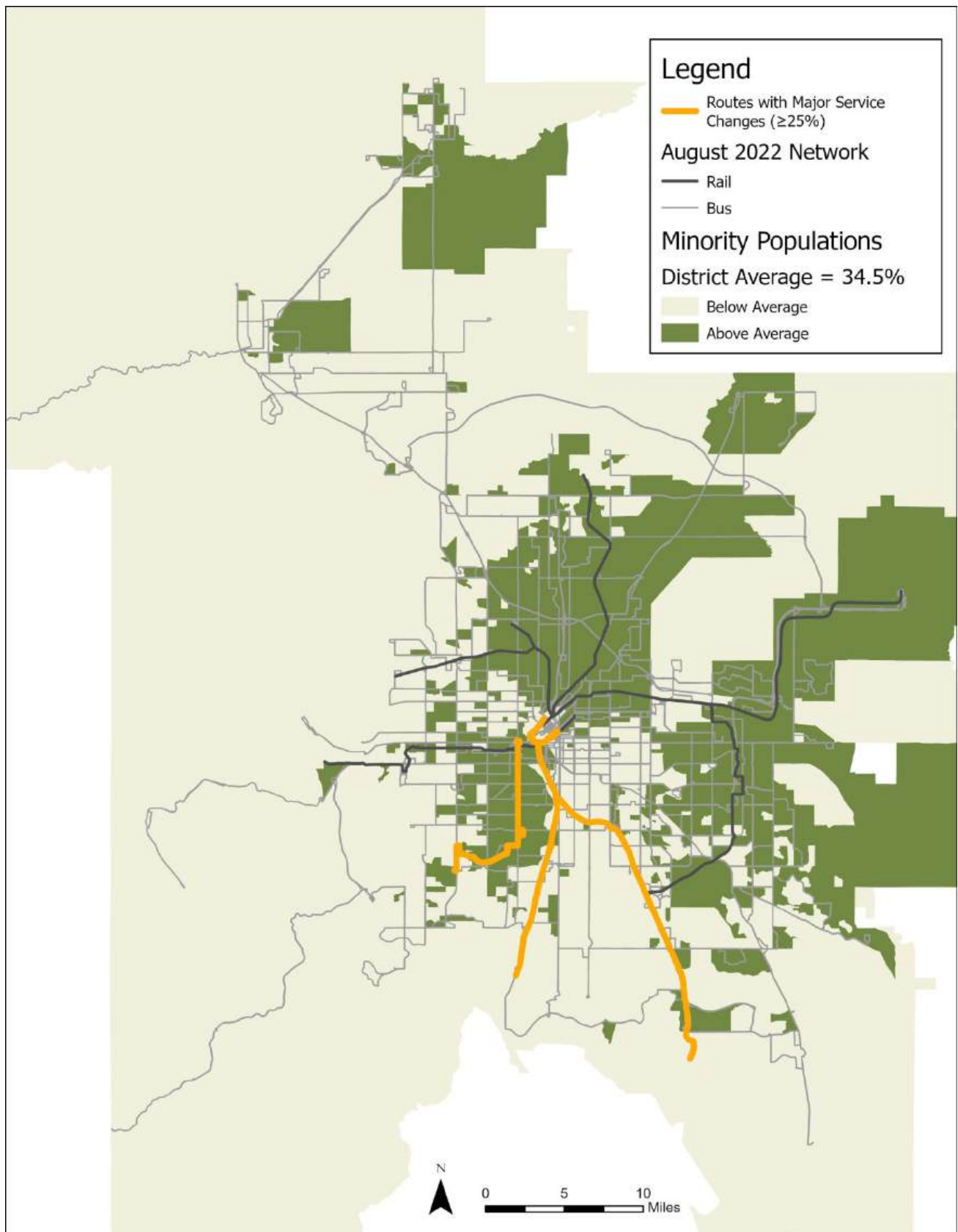


Figure 2. District block groups with above-average minority population (green); US Census Bureau 2014-2018 5-Year Estimates

# Service Equity Analysis: January 2023

The August 2022 to January 2023 service changes are captured in Figure 3. Depiction of route and segment changes by severity of change, s. This map provides a generalized view of where service is changing at the route pattern level. The August 2022 bus network is colorized according to the percentage change in service hours. Rail service on the C and F Lines are shown in blue (100% service change) due to the discontinuation of the services. The network includes one route (Route 30) in teal, representing significant modifications and one route (12) in green as a minor modification. Route 12 will be split into two routes with a new Route 7 serving the northern half of the existing corridor. All other routes bus routes, shown in grey, are programmed to undergo minimal (e.g., schedule adjustments, minor realignments) or no service changes in January 2023.

# Service Equity Analysis: January 2023

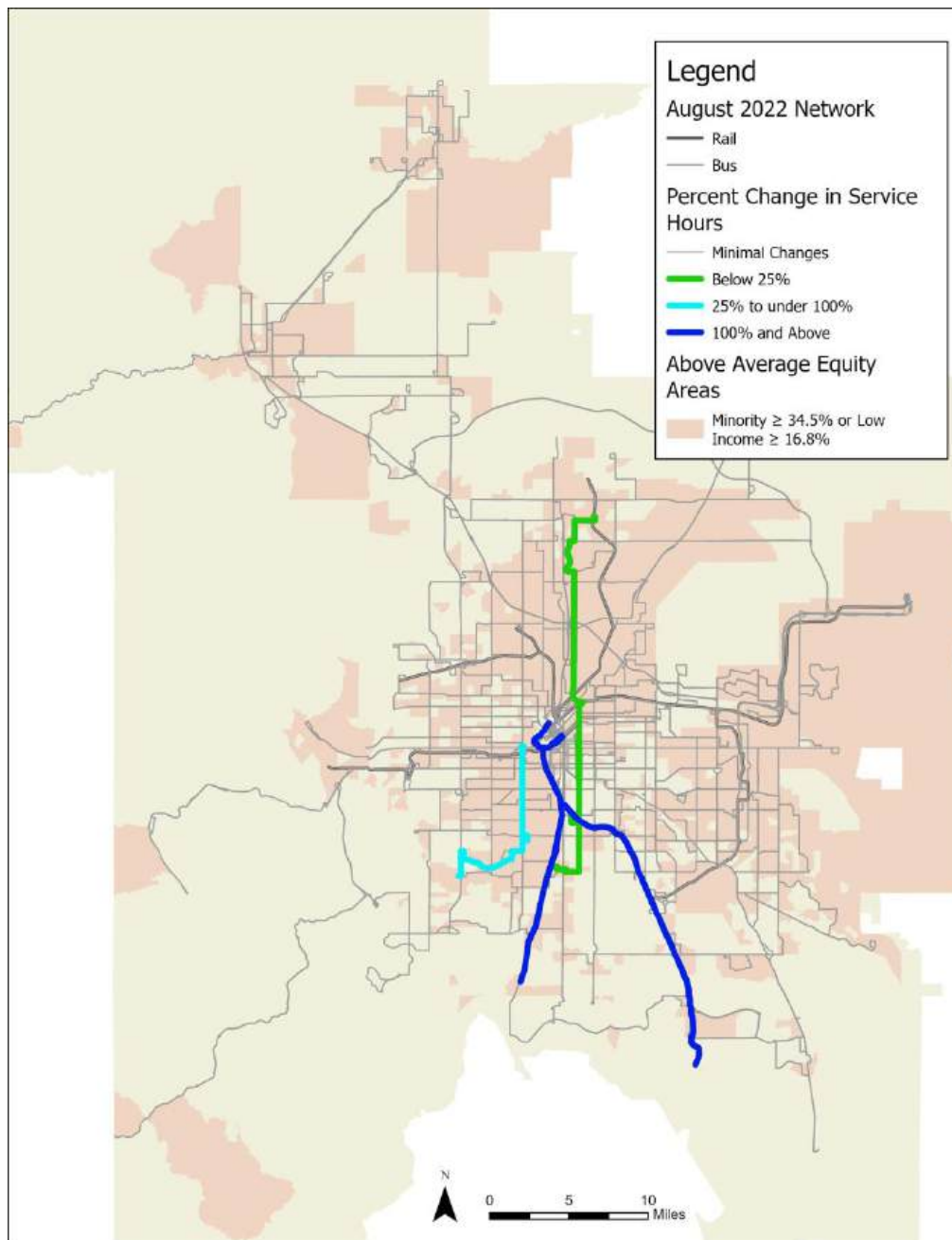


Figure 3. Depiction of route and segment changes by severity of change, August 2022 to January 2023

## Summary of Findings

The network changes that are proposed between August 2022 and January 2023 include modifications to service that include additional trips and longer spans of service. The major service change increases were entirely invested in bus services. Major service change decreases resulted in the discontinuation of the C and F Lines. The C Line has been suspended since January 2021, and the F Line has been suspended since September 2020.

# Service Equity Analysis: January 2023

## Route-level Findings:

- Of the 26 total services with proposed changes, taken individually, **two had a potential disproportionate burden finding**.

**Error! Reference source not found.**<sup>7</sup> 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	30	South Federal	No	No	83%
Discontinued	C	Union Station – Littleton-Mineral	No	Yes	100%
	F	18 <sup>th</sup> and Stout – RidgeGate Parkway	No	Yes	100%

## 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:

- Alter the service proposal to avoid, minimize, or mitigate potential disparate impacts/disproportionate burdens, or
- 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 January 2023 service changes<sup>4</sup> include adding improvements to Route 30, which serves high concentrations of equity populations. Although the C and F Lines are proposed to be permanently discontinued, stations currently served by the C and F Lines will continue to be served by rail service at 15-minute peak headways. The stations served prior to the discontinuation of the C Line will continue to be served by the D Line, with transfers at I-25•Broadway Station to either the W or E Line required to continue to Denver Union Station. The stations served prior to the discontinuation of the F Line will continue to be served by the E Line, with transfers at I-25•Broadway Station to either the D or H Line required to continue to 18th•Stout Station. These service changes signify the agency's commitment to ensure an equitable distribution of service improvements and to minimize impacts with the permanent discontinuance of these rail lines.

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 January 2023 service changes proposal.

## Systemwide-level Findings:

<sup>4</sup> <https://www.rtd-denver.com/service-changes/january-2023>

# Service Equity Analysis: January 2023

- Of the more than 36,000 people with access to bus stops within the service area of the bus route with a major service improvement, minority and low-income groups represented a higher share of the population than district averages, indicating targeted services to equity populations
- When considering the demographics within the service areas of the bus route with a major service change 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 +1.84% benefit above non-minority areas and low-income areas received +1.67% compared to higher-income areas
- Of the over 27,000 people with access to rail stations with major service decreases, low-income populations were impacted at a lower rate than the higher-income district average, whereas minority populations represented a higher share of the population than non-minority populations.

## Appendix A: Systemwide Service Changes

Table A-1

Change Type	Service Changes	
	Route	Description
<b><i>Modified</i></b>	11	Perform a running time analysis to improve on-time performance of the route.



# Service Equity Analysis: January 2023

Change Type	Service Changes	
	Route	Description
	12	Split Route 12 into the former Routes 7 (see page 14) and 12, with the northern portion operating as Route 7 between 38th/Blake Station and Northglenn at 112th Station, and the southern portion continuing operating between Englewood Station and 38th/Blake Station as the Route 12. This proposal is aimed at improving on-time performance, by creating two shorter route alignments with separate operating schedules and greater opportunities for schedule recovery.
	15	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	15L	Schedule adjustments are proposed to coordinate the anticipated changes to the Route 15 operating schedule.
	21	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	24	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	30	Extend the weekday span of service. The route currently operates from 9 a.m. to 4:30 p.m. northbound, and 10 a.m. to 5:30 p.m. southbound. This extends service to cover from 5 a.m. to 9 p.m. both directions. Sunday, add southbound service over the alignment. Due to a previous configuration that is no longer in use, route 30 only runs northbound on Sundays from 8 a.m. to 5 p.m.
	42	Schedule adjustments to allow for better connections between services.
	44	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	76	Reroute route 76 in the area between I-70 and Olde Town Arvada Station to enhance operational safety. New northbound routing will be R – 52nd Ave, L – Vance St, C – 53rd Ave, to regular routing. New southbound routing will be C – Vance St, R – 52nd Ave, L – Wadsworth Blvd, to regular routing. This will add service to stops #21428 and 22763, without losing service to any current stops.
	83D/83L	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed.
	88	Adjust the meet times at Colorado at 72nd Ave Station with the N Line for better connections, weekdays, Saturdays and Sundays.
	93L	Adjust the meet times at Colorado at 72nd Ave Station with the N Line for better connections, weekdays, Saturdays and Sundays.
	130	Schedule adjustments resulting from running time analysis, aimed at improving on-time performance are proposed for weekday service.
	AT	Responding to frequent requests from Denver International Airport employees, schedule adjustments modify the schedule to leave DIA 2-5 minutes later. This change would accommodate DIA employees shift end times.
	228	Extend the northern portion of the route, from Kestrel Low Income Housing to Forest Park Drive/Arapahoe Ave as well as Diamond Circle/Aspen Ridge

# Service Equity Analysis: January 2023

Change Type	Service Changes	
	Route	Description
		Drive (Sister Carmen Community Center/Walmart area), with both patterns operating at an hourly headway to both terminals. This would result in a weekday 30 min all-day headway between US36/Flatiron Station and 95th St/Baseline (6 a.m.-9 p.m.), Saturday and Sunday the route would operate hourly and serve the Diamond Circle/Aspen Ridge Drive (Sister Carmen Community Center/Walmart area) only.
	BOLT	Perform a running time analysis to improve on-time performance.
	D Line	Minor schedule adjustments to improve train sequencing through the central corridor, and on-time performance.
	E Line	Minor schedule adjustments to improve train sequencing through the central corridor, on-time performance, and connections with other rail line in the system.
	H Line	Sequencing adjustments to improve operational reliability.
	L Line	Minor schedule adjustments to improve train sequencing through the central downtown corridor, and on-time performance.
	R Line	Minor schedule adjustments to improve train sequencing with the E and H Lines, and on-time performance.
<b>Reductions</b>	W Line	Minor schedule adjustments to improve train sequencing, connections with the E Line, and on-time performance.
	120L	Remove the Adams County Government Center stop from the pattern/routing on Saturdays only, as the facility is closed on weekends.
<b>Discontinued</b>	C Line	Regular service on the C Line is discontinued.
	F Line	Regular service on the F Line is discontinued.

## Appendix B: Route Analysis Tables

### Major Service Changes

#### BUS

#### Route 30 – South Federal



# Service Equity Analysis: January 2023

Expand the weekday hours of service to operate between 5 a.m. and 9 p.m. for both the north and southbound schedules. Proposal also includes adding a southbound schedule to Sundays to provide bi-directional service.

Route 30				
	Non-Minority Population	Minority Population	Higher Income Population	Low-Income Population
Route Service Area Impacted	11,050	25,173	23,323	12,548
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%	99.1%	97.5%
% District Impacted	0.57%	2.35%	0.94%	2.52%
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
	0.51%	2.35%	0.85%	2.52%

## RAIL

### C Line

Route C Union Station to Littleton-Mineral Station				
	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%

### F Line

# Service Equity Analysis: January 2023

Route F 18th & California Station to RidgeGate Parkway Station				
	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%



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Through Connections.

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# January 2023 Runboard Service Equity Analysis

Carl Green Jr., Interim Director, Civil Rights

# Overview

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- § Proposed Service Changes Summary
- § Federal Transit Administration (FTA) Requirements
- § Title VI and Service Equity Analysis Overview
- § Title VI Policies
- § Methodology
- § Route and Network Analysis and Conclusions
- § Recommendation

## Proposed Service Changes Summary

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<b>Modified Services (24 services)</b>	11, 12, 15, 15L, 21, 24, 30, 42, 44, 76, 83D/83L, 88, 93L, 130, AT, 228, BOLT  D Line, E Line, H Line, L Line, R Line, W Line
<b>Reductions (1 service)</b>	120L
<b>Discontinued (2 services)</b>	C Line, F Line



# FTA Requirements for Service Changes

Proposed January 2023 Service Changes

## Title VI of the Civil Rights Act of 1964

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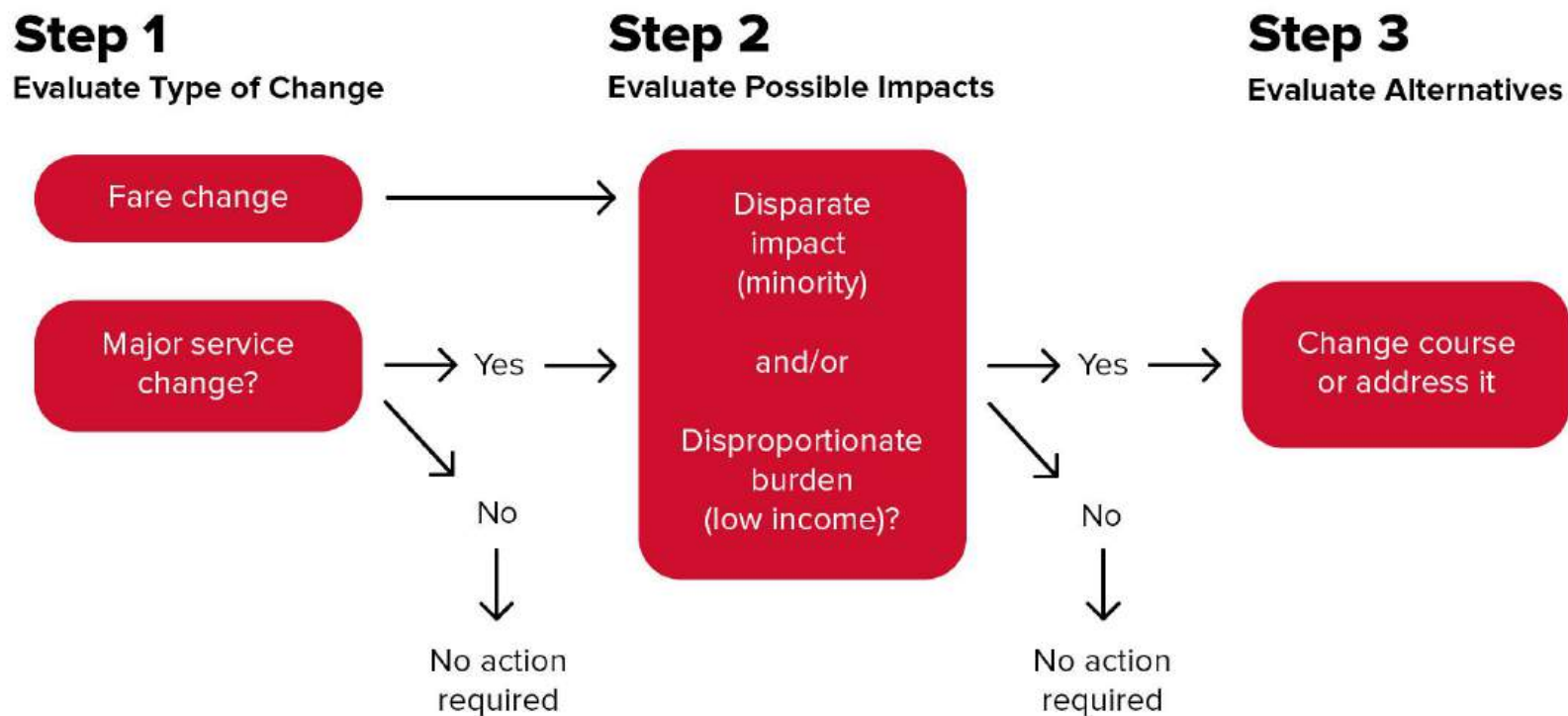


"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

FTA Circular 4702.1B *Title VI Requirements and Guidelines* and RTD Title VI Program

# Title VI Equity Analysis Overview

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Minority and Low-Income = Equity Populations





# Title VI Policies

Major Service Change, Disparate Impact and Disproportionate Burden Policies

# Major Service Change Policy

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## Definition:

§ 25% + or - in the service hours of any route that would remain in effect for 12+ months

## Major Service Change Results:

§ Increases – one out of 26 met the major service change threshold

§ Discontinuations – two out of 26 met the major service change threshold

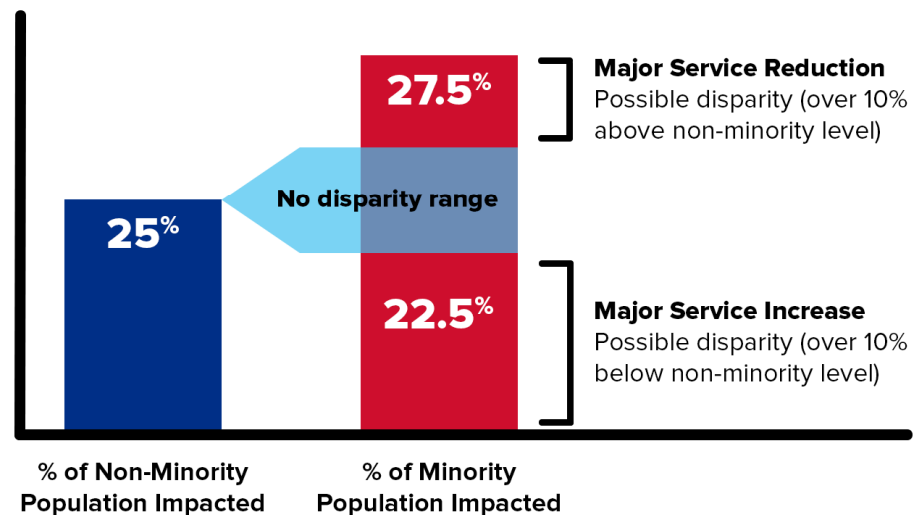
# Disparate Impact and Disproportionate Burden Policies

Title VI Policies

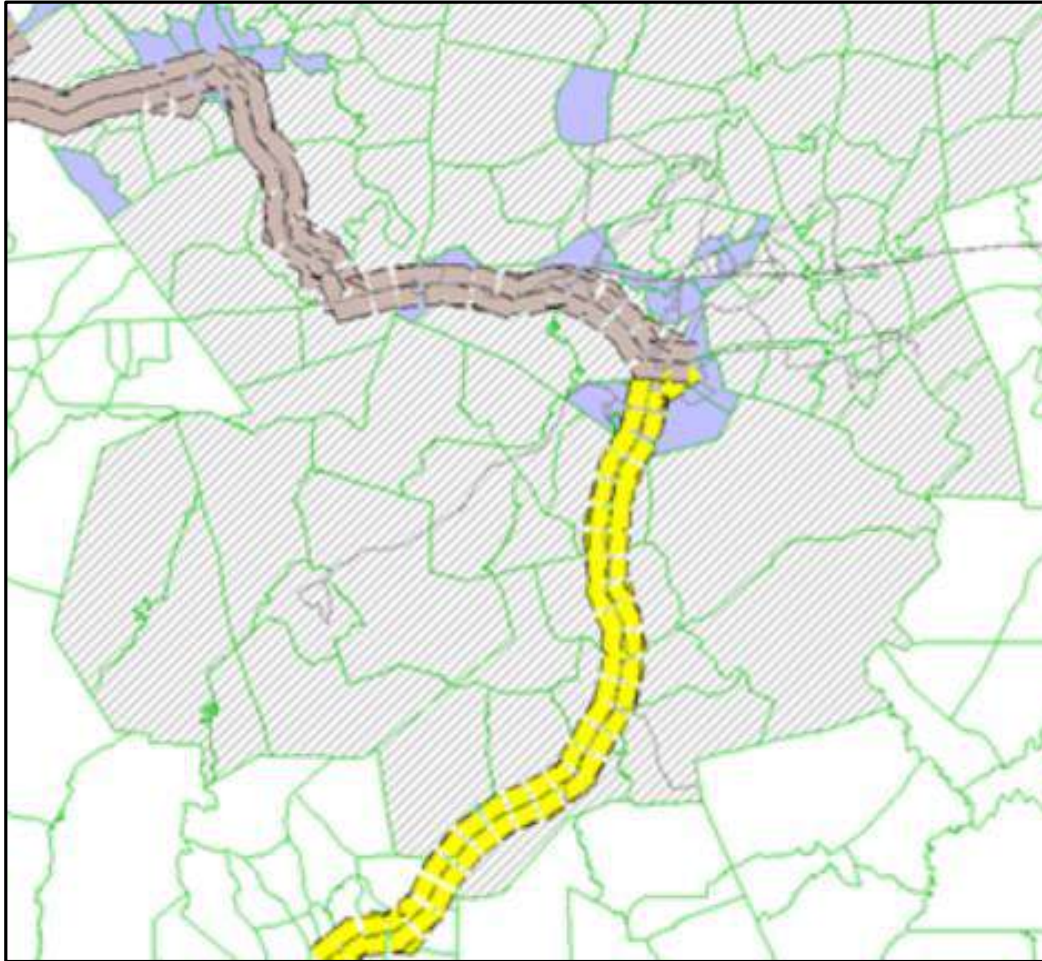
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Thresholds to Evaluate Possible Impacts

## Testing for Disparate Impact at the System Level



Threshold Calculation: 10% of 25% (non-minority) = 2.5%



1/4-mile route buffer around a route

## Methodology

1. Route-level analysis applied
2. Network analysis applied

## Route Level Results

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§ One route = no potential disparate impact or disproportionate burden

§ Two lines = no disparate impacts but potential disproportionate burden

## Network Level Results and Conclusion

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§ Equity groups represented a higher population share than District averages

§ Minority groups not disproportionately impacted by C and F Lines discontinuation

## Network Level Results and Conclusion (cont'd)

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§ Potential burden on low-income populations relative to higher income populations slightly exceeds threshold

- **Mitigation:** All stations served by C and F Lines will continue to be served by existing rail service at 15-minute peak headways

§ Both minority and low-income equity populations receive greater service increase service (positively impacted more) compared to non-equity populations

- +1.84% more for minority groups and +1.67% more for low-income groups

# Recommendation

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§ January 2023 Title VI service equity approval



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# **RTD 2025-2028 Title VI Program**

## **Attachment V: MyRide Stored Value Discount Fare Equity Analysis**

DRAFT

# BOARD OF DIRECTORS REPORT

## MyRide Stored Value Discount Title VI Fare Equity Analysis

Committee Meeting Date:
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May 10, 2022
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Board Meeting Date:
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May 24, 2022
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### 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)

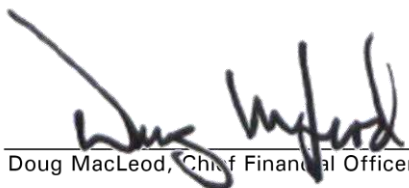
- Fare Equity Analysis Report Appendix B RTD MyRide 2022 Customer Survey Final (PDF)
- 2022-04-29 - MyRide SV Fare Equity Analysis Presentation to Board of Directors (PPTX)

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

Prepared by:

Carl Green Jr., Director, Civil Rights

Approved by:



Doug MacLeod, Chief Financial Officer

5/2/2022

Authorized by:



Debra A. Johnson, General Manager and CEO

5/5/2022

# Title VI Fare Equity Analysis

MyRide Smart Card Stored Value Discount Proposed Change

April 2022

## Table of Contents

Executive Summary: MyRide Stored Value Discount Changes .....	2
Methodology .....	2
Findings – 2019 Survey Data .....	2
Considerations – MyRide Card Sales.....	2
Introduction .....	3
Background .....	3
Title VI and Environmental Justice .....	4
RTD’s Title VI Equity Analysis Policies .....	4
Proposed Fare Change .....	5
Description of Changes .....	5
Analysis .....	5
Methodology.....	5
Average Fare Analysis .....	6
Data Sources .....	7
Average Fare Analysis Findings .....	8
Fare Change Equity Analysis Conclusions .....	10
MyRide Stored Value Card Sales Considerations.....	10
2022 RTD MyRide Customer Survey .....	11
Mitigation Measures and Public Outreach .....	12
Mitigation Measures.....	12
Public Outreach.....	13
Appendix A: Average Fare Analysis.....	14
Appendix B: 2022 RTD MyRide Customer Survey Instrument .....	15



## 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 Smart Card 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 customers?** 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 is proposing the elimination of the MyRide Smart Card Stored 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 using 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<sup>1</sup>. 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 according to 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 seamless 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.

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<sup>1</sup> Provides eligible customers with a 40% discount off the regular RTD fare.

## Title VI and Environmental Justice

Equity is a core principle of the Regional Transportation District's (RTD) functional mission to provide public transit services within the Denver 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 decisions upon which not to integrate 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 <sup>2</sup>	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

<sup>2</sup> Fare capping will be included in the Systemwide Fare Study and Equity Analysis.

from customers 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.

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 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.<sup>3</sup>

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.<sup>4</sup>

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 2019 CSS comports with the FTA data requirements<sup>5</sup> for conducting fare equity analyses (i.e., customer 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.

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<sup>3</sup> Federal Circular: C4702.1B Chap. IV-10

<sup>4</sup> Federal Circular: C4702.1B Chap. IV-19

<sup>5</sup> Federal Circular: C4702.1B Chap. IV-3

## 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 Customer Category (e.g., Full Fare, 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.

## 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
<b>Total</b>	<b>104,028,500</b>	<b>\$149,860,000</b>	<b>\$150,067,716</b>	<b>35,061,718</b>	<b>\$50,294,158</b>	<b>\$50,337,931</b>	<b>68,966,782</b>	<b>\$99,565,842</b>	<b>\$99,729,785</b>
<b>Average Fare</b>		<b>\$1.441</b>	<b>\$1.443</b>	<b>Average Fare</b>	<b>\$1.434</b>	<b>\$1.436</b>	<b>Average Fare</b>	<b>\$1.444</b>	<b>\$1.446</b>
<b>% Change in Average Fare</b>			<b>0.14%</b>	<b>% Change in Average Fare</b>		<b>0.09%</b>	<b>% Change in Average Fare</b>		<b>0.16%</b>
<b>Difference between Protected and Non-Protected Populations</b>						<b>-0.08%</b>	*Values may not match exactly, due to rounding		
<b>Difference between Protected and All Populations</b>						<b>-0.05%</b>	*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
<b>Total</b>	<b>104,028,500</b>	<b>\$149,860,000</b>	<b>\$150,067,716</b>	<b>27,523,569</b>	<b>\$39,387,084</b>	<b>\$39,413,525</b>	<b>76,504,931</b>	<b>\$110,472,916</b>	<b>\$110,654,191</b>
<b>Average Fare</b>	<b>\$1.441</b>	<b>\$1.443</b>	<b>Average Fare</b>	<b>\$1.431</b>	<b>\$1.432</b>	<b>Average Fare</b>	<b>\$1.444</b>	<b>\$1.446</b>	<b>\$1.446</b>
<b>% Change in Average Fare</b>	<b>0.14%</b>	<b>% Change in Average Fare</b>	<b>0.07%</b>	<b>% Change in Average Fare</b>	<b>0.16%</b>	<b>% Change in Average Fare</b>	<b>0.16%</b>	<b>% Change in Average Fare</b>	<b>0.16%</b>
<b>Difference between Protected and Non-Protected Populations</b>						<b>-0.10%</b>	*Values may not match exactly, due to rounding		
<b>Difference between Protected and All Populations</b>						<b>-0.07%</b>	*Values may not match exactly, due to rounding		

## Fare Change Equity Analysis Conclusions

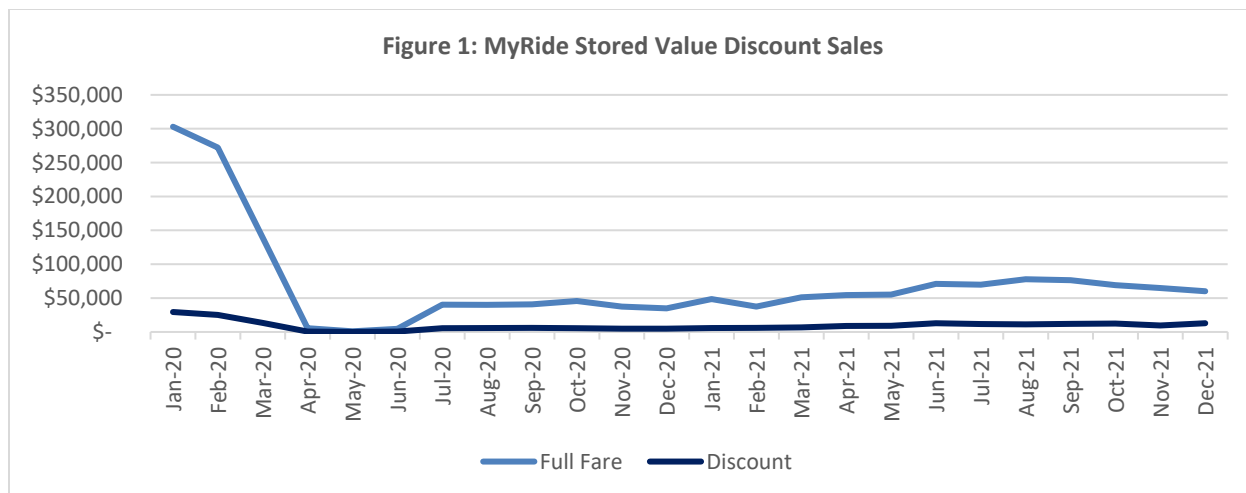
The proposed fare changes required a fare equity analysis to identify any potential disparate impacts on minority customers and/or disproportionate burden on low-income customers. The technical analysis using survey data found:

- No potential disparate impact on minority customers associated with the MyRide Stored Value discount elimination
- No potential disproportionate burden on low-income customers associated with the MyRide Stored Value discount elimination

The result of this equity analysis concludes that minority and low-income customers 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-income<sup>6</sup>;

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 frequently they ride RTD services and a majority (63%) are defined as infrequent<sup>7</sup> 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

<sup>6</sup> 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.

<sup>7</sup> 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 previously noted in Table 1, fare capping increases period pass affordability by allowing customers to purchase period passes in smaller increments. As a result, customers will pay 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"> <li>• 56% Use Exact Change</li> <li>• 33% Purchase mobile tickets (3-Hour or DayPass)</li> <li>• 59% Purchase mobile Monthly Pass</li> <li>• 47% Purchase mobile 10-Ride Ticket Packs</li> <li>• 53% Purchase paper tickets (3-Hour or DayPass)</li> <li>• 55% Purchase paper 10-Ride Ticket Books</li> <li>• 66% Purchase paper Monthly Passes</li> </ul>

## 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 customers. 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 customers 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		
					Customer Boardings	Fare Revenue		Customer Boardings	Fare Revenue		Customer Boardings	Fare Revenue	
	Existing	Proposed				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.



# MyRide Smart Card Stored Value Discount Title VI Fare Equity Analysis

Finance and Planning Committee Meeting

Carl Green Jr., Transit Equity Manager

May 10, 2022



# FTA Requirements for Fare Changes – Proposed Discount Elimination

# Proposed Fare Changes – Summary

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<b>Eliminate</b>	Full Fare MyRide Stored Value \$0.20 discount over the applicable Three-Hour Pass fare
<b>Eliminate</b>	Discount MyRide Stored Value \$0.10 discount over the applicable Three-Hour Pass fare

Note: Youth and LiVE program customers receive no discount when using MyRide Stored Value.



## Title VI of the Civil Rights Act of 1964

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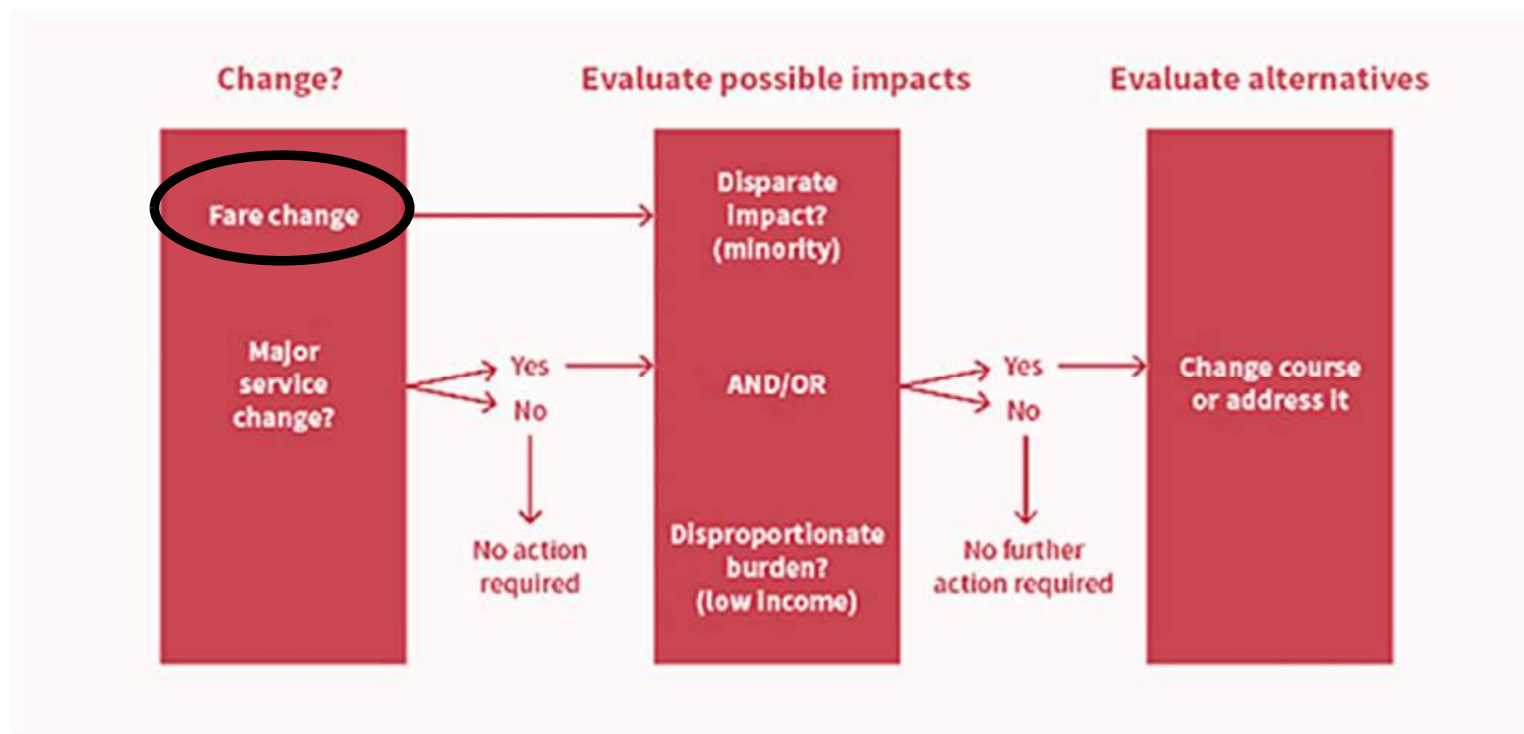


*"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance".*

FTA Circular 4702.1B *Title VI Requirements and Guidelines* and RTD Title VI Program

# Title VI Fare Equity Analysis Overview

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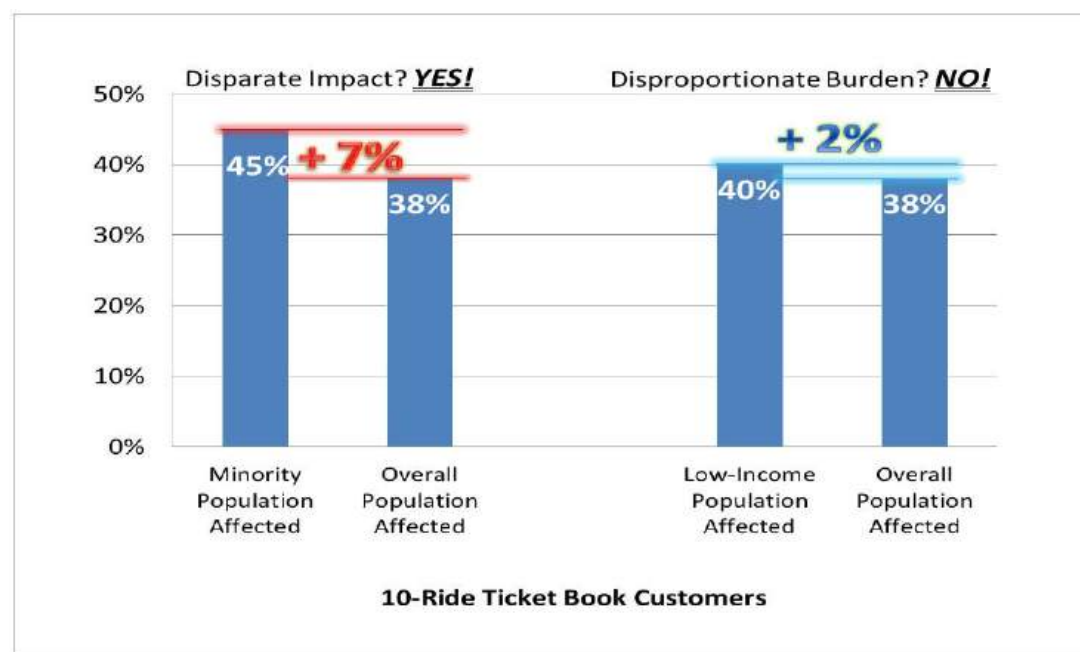
Minority and Low-Income = Equity Populations

## Disparate Impact/Disproportionate Burden Policies

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*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.*

# Evaluate Possible Impacts Example



RTD thresholds indicating a disparate impact or disproportionate burden is set at +/-5%

# Methodology

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- § Average Fare Analysis applied
  - § Absolute change and percent change

- § 2019 ridership and revenue data

- § 2019 customer intercepts

# Average Fare Analysis Results

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§ Fare change would not represent a Disparate Impact on Minority customers

- Difference between Minority and Overall Ridership is -0.05%.

§ Fare change would not represent Disproportionate Burden on low-income customers

- Difference between Low-income and Overall Ridership is -0.07%.

# Conclusions

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- § Proposed fare changes expected to have a lesser impact on Title VI customers
- § No Title VI equity concerns under agency Title VI policies
- § No mitigations required
  - MyRide transition measures already planned or implemented

## Recommendation

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Eliminate MyRide stored value discount following Title VI fare equity analysis



Thank you.

# **RTD 2025-2028 Title VI Program**

## **Attachment W: 2022 Service Performance Monitoring Report**

DRAFT



# 2022 Title VI Service Performance Monitoring Report

**July 2023**

# Title VI Service Performance Monitoring Report

## Table of Contents

- Executive Summary ..... 2
- Title VI and Environmental Justice ..... 2
- Service Standards and Transit Monitoring Overview ..... 3
- Title VI Service Performance Measure Rating Scale Rubric..... 3
- Minority vs. Non-Minority Lines/Routes Performance Results ..... 5
  - Summary Table: Distribution of Amenities ..... 5
  - Summary Table: Service Standards ..... 5
  - Distribution of Amenities ..... 6
  - Vehicle Loads..... 6
  - Revenue Hours..... 6
  - On-Time Performance (OTP) ..... 6
  - Vehicle Assignment ..... 7
  - Service Availability ..... 7
- Low-Income vs. Non-Low-Income Lines/Routes Performance Results ..... 8
  - Summary Table: Distribution of Amenities ..... 8
  - Summary Table: Service Standards ..... 8
  - Distribution of Amenities ..... 9
  - Vehicle Loads..... 9
  - Revenue Hours..... 9
  - On-Time Performance (OTP) ..... 10
  - Vehicle Assignment ..... 10
  - Service Availability ..... 10
- Exhibit A: Stop Amenities ..... 11
  - Stop Amenities: Minority and Non-Minority ..... 11
  - Stop Amenities: Low-Income and Non-Low-Income..... 11
- Exhibit B: Vehicle Loads ..... 12
  - Vehicle Loads Table: Minority and Non-Minority ..... 12
  - Vehicle Loads Table: Low-Income and Non-Low-Income ..... 12
- Exhibit C: Revenue Hours..... 13
  - Revenue Hours Table: Minority and Non-Minority..... 13
  - Revenue Hours Table: Low-Income and Non-Low-Income ..... 13
- Exhibit D: On-Time Performance..... 14
  - On-Time Performance Table: Minority and Non-Minority..... 14
  - On-Time Performance Table: Low-Income and Non-Low-Income ..... 15
- Exhibit E: Vehicle Assignment..... 16
  - Vehicle Assignment Table: Minority and Non-Minority ..... 16
  - Vehicle Assignment Table: Low-Income and Non-Low-Income ..... 17
- Exhibit F: Service Availability Table ..... 18

# Title VI Service Performance Monitoring Report

## Executive Summary

The Regional Transportation District (RTD) conducts ongoing performance monitoring across all service modes (i.e., bus, light rail, and commuter rail) to comply with Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration's accompanying Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" (Title VI Circular) as well as to ensure equitable distribution across RTD's system. The analysis in this report compared minority access to that of non-minority access as well as low-income access to that of non-low-income access across six service performance metrics: stop amenities, vehicle loads, revenue hours, on-time performance, vehicle assignment, and service availability.

The target for RTD's 2021-2026 Strategic Plan objective is for minority and low-income routes and lines to achieve within 10% or better of their counterparts per service performance metric. A metric above the 10% threshold but within 20% would result in a "marginal" score. A marginal score would flag that metric as a caution and area for improvement. Any composite score that exceeds 20% for minority populations would indicate "adverse impact" and would result in a system-wide disparate impact<sup>1</sup> finding per the Federal Transit Administration (FTA). A disparate impact finding requires RTD to take steps to reduce the potential effects. Any composite score that exceeds 20% for low-income populations would result in a system-wide disproportionate burden<sup>2</sup> finding. RTD will consider opportunities to reduce the potential effects where practicable.

This analysis found no adverse impacts across stop amenities, vehicle loads, revenue hours, on-time performance, vehicle assignment, and service availability. In fact, most of the six service performance metrics performed as good or better on minority and low-income lines and routes than non-minority and non-low-income lines and routes. However, the revenue hours of service metric for minority bus routes received a marginal score and is thus flagged as an area for improvement, with 14.25% less revenue hours provided on minority local and regional bus routes than non-minority local and regional routes (43.88% vs. 57.12%, respectively). It is also important to note that, at the system level, a lower percentage of revenue hours of service are provided on all minority modes of service than all non-minority modes of service (45.23% vs. 54.77%, respectively), with a difference in revenue hours of service at 9.54%. Though this does not meet the 10% marginal score threshold, it is very close and should be flagged for improvement accordingly.

## Title VI

Equity is a core principle of RTD's functional mission to provide public transit services 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.

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."

The Federal Transit Administration's (FTA) Circular 4702.1B provides its recipients of FTA financial assistance with instructions for achieving compliance with Title VI. In the Title VI 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.

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<sup>1</sup> A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin.

<sup>2</sup> A facially neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations

# Title VI Service Performance Monitoring Report

## Service Standards and Transit Monitoring Overview

Part of RTD's compliance with the Title VI Circular is ongoing performance monitoring across all service modes (local and regional 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 there is an equitable distribution across RTD's system. The analysis in this report compared minority access to that of non-minority access as well as low-income access to that of non-low-income access across six service performance metrics for data compiled during calendar year 2022:

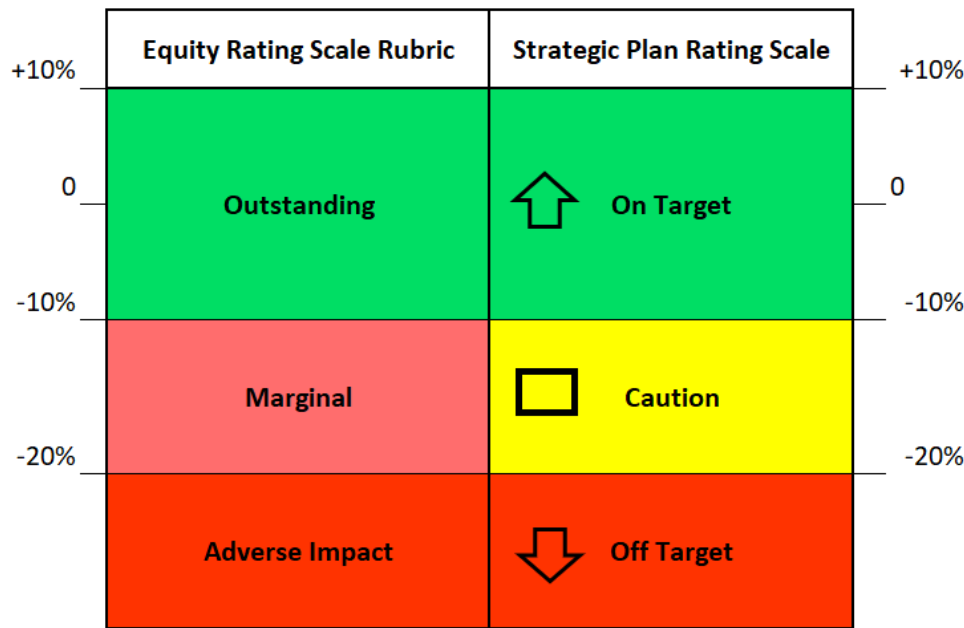
- **Stop amenities:** RTD analyzes the distribution of stop amenities in the RTD system (specifically, shelters; seating; lighting; elevators; digital displays; signs, maps, and/or schedules; waste receptacles and ticket vending machines) to identify any potential disparities.
- **Vehicle loads:** RTD evaluates whether weekday local, regional, SkyRide, Bus Rapid Transit, light and commuter rail vehicles are overcrowded by comparing the load/seat factor for each vehicle type and time period (i.e., 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. The standard is equal to or greater than 125% of the seats for local (peak), where all other vehicle types and time periods abide by a standard of equal to or greater than 100%. 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.
- **Revenue hours:** RTD evaluates the amount and distribution of revenue hours of service provided in census block groups. The hours while in service include trip start to finish.
- **On-time performance:** RTD defines "on-time" as no more than one minute early or five minutes late, measured at time points.
- **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 non-low-income lines/routes.
- **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.

## Title VI Service Performance Measure Rating Scale Rubric

The target for RTD's 2021-2026 Strategic Plan objective is for minority and low-income routes and lines to achieve within 10% or better per service performance metric. This range will guide RTD in establishing a baseline to set targets for subsequent years. A metric above the 10% threshold but within 20% would result in a "marginal" score. A marginal score would flag that metric as a caution and area for improvement. Any composite measure that exceeds 20% would indicate "adverse impact" and would result in a system-wide disparate impact finding per the Federal Transit Administration. RTD will work to improve service and access on an on-going basis to ensure RTD's equity goals are achieved and for compliance with RTD's Board adopted Title VI Program.

# Title VI Service Performance Monitoring Report

Legend



# Title VI Service Performance Monitoring Report

## Minority vs. Non-Minority Lines/Routes Performance Results<sup>3</sup>

Summary Table: Distribution of Amenities

<b>Metric</b> % of stops with amenity on minority vs. non-minority lines/routes	<b>≥20% difference</b>	<b>10%-19.99% difference</b>	<b>&lt;10% difference</b>
<b>Seating</b>	✓	✓	✓
<b>Lighting</b>	✓	✓	✓
<b>Elevators</b>	✓	✓	✓
<b>Digital Displays</b>	✓	✓	✓
<b>Shelters</b>	✓	✓	✓
<b>Signs, Maps, and/or Schedules</b>	✓	✓	✓
<b>Waste Receptacles</b>	✓	✓	✓
<b>Ticket Vending Machines</b>	✓	✓	✓

Summary Table: Service Standards

<b>Metric</b> Minority and non-minority comparison by mode and for the system as a whole	<b>≥20% difference</b>					<b>10%-19.99% difference</b>					<b>&lt;10% difference</b>				
	Local	Regional	Light Rail	Commuter Rail	System	Local	Regional	Light Rail	Commuter Rail	System	Local	Regional	Light Rail	Commuter Rail	System
<b>Vehicle Loads</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Revenue Hours</b>	✓	✓	✓	✓	✓	✗	✗	✓	✓	✓	✗	✗	✓	✓	✓
<b>On-Time Performance</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Vehicle Assignment</b>	✓	✓	N/A	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓
<b>Service Availability</b>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

<sup>3</sup> 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 Performance Monitoring Report

## 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 elevators; shelters; signs/maps, and/or schedules; and waste receptacles (0.67%, 3.07%, 2.40%, and 0.38% respectively).
- The percentage of minority stops containing seating is 1.32% higher than the percentage of non-minority stops containing seating.
- The percentage of minority stops containing lighting is 5.28% higher than the percentage of non-minority stops containing lighting.
- The percentage of minority stops containing digital displays is 1.03% higher than the percentage of non-minority stops containing digital displays.
- The percentage of minority stops containing ticket vending machines is 0.08% higher than the percentage of non-minority stops containing ticket vending machines.

## Vehicle Loads (See Exhibit B for full details)

- Average load/seat percentages range from a low of 0.00% to a high of 7.45%.
- A slightly higher percentage of trips that exceed the maximum load factor occurs on minority commuter rail during the midday time period than non-minority commuter rail (0.05% vs. 0.00%, respectively) with a difference of 0.05%.
- All average loads by mode are below the maximum load factor for every time period.

## Revenue Hours (See Exhibit C for full details)

- A lower percentage of revenue hours of all bus services is provided in minority census block groups than non-minority census block groups (43.88% vs. 57.12%, respectively) with a difference in revenue hours of service at 14.25%.
- A lower percentage of revenue hours of light rail service are provided in minority census block groups than non-minority census block groups (46.4% vs. 53.6%, respectively) with a difference in revenue hours of service at 7.2%.
- A greater percentage of revenue hours of commuter rail service in minority census block groups than non-minority census block groups (81.04% vs. 18.96%, respectively) with a difference in revenue hours of service at 62.07%.
- A lower percentage of revenue hours of all service are provided in minority census block groups than non-minority census block groups (45.23% vs. 54.77%, respectively) with a difference in revenue hours of service at 9.54%.

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

- The average OTP for minority local bus routes is 1.67% lower than OTP for non-minority local bus routes on weekdays. The Saturday average OTP for minority local bus routes is 1.06% lower than OTP for non-minority bus routes. The Sunday average OTP for minority local bus routes is 3.12% lower than OTP for non-minority bus routes.
- The average OTP for minority regional bus routes is 10.38% greater than OTP for non-minority regional bus routes on weekdays. The Saturday average OTP for minority regional bus routes is 14.74% greater

# Title VI Service Performance Monitoring Report

than OTP for non-minority local bus routes. The Sunday average OTP for minority regional bus routes is 13.28% greater than OTP for non-minority local bus routes.

- The average OTP for the four minority light rail lines is 1.05% lower than the OTP for the two non-minority light lines for Monday-Thursday. The Friday average OTP for minority light rail lines is 2.48% lower than the OTP for non-minority light rail lines. The Saturday average OTP for minority light rail lines is 1.03% lower than the OTP for non-minority light rail lines. The Sunday average OTP for minority light rail lines is 2.23% lower than the OTP for non-minority light rail lines.
- The average OTP for the three minority commuter rail lines is 0.06% greater than the OTP for the one non-minority commuter rail line for Monday-Thursday. The Friday average OTP for minority commuter rail lines is 1.37% lower than the OTP for non-minority commuter rail lines. The Saturday average OTP for minority commuter rail lines is 2.20% greater than the OTP for non-minority commuter rail lines. The Sunday average OTP for minority commuter rail lines is 0.30% greater than the OTP for non-minority commuter rail lines.

## Vehicle Assignment (See Exhibit E for full details)

- The average age of vehicles on minority weekday bus routes (6.92 years) is about 18% less than the average age of vehicles on non-minority weekday bus routes (8.46 years).
- The average age of vehicles on minority weekend bus routes (6.87 years) is about 19% less than the average age of vehicles on non-minority weekend bus routes (8.47 years).
- Light rail vehicles are randomly assigned to all lines daily. Thus, there is no difference in the average age of light rail vehicles between minority lines and non-minority lines.
- All 66 RTD commuter rail vehicles were purchased in 2014. Thus, there is no difference in the average age of commuter rail vehicles between minority lines and non-minority lines.

## 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 rail compared to the district's non-minority population.
- A slightly higher percentage of the RTD district's non-minority population lives within ½ mile of regional bus compared to the district's minority population (9.9% vs. 7.7%, respectively).

# Title VI Service Performance Monitoring Report

## Low-Income vs. Non-Low-Income Lines/Routes Performance Results

Summary Table: Distribution of Amenities

Summary Table: Distribution of Amenities			
Metric % of stops with amenity on low-income vs. non-low-income lines/routes	≥20% difference	10%-19.99% difference	<10% difference
Seating	✓	✓	✓
Lighting	✓	✓	✓
Elevators	✓	✓	✓
Digital Displays	✓	✓	✓
Shelters	✓	✓	✓
Signs, Maps and/or Schedules	✓	✓	✓
Waste Receptacles	✓	✓	✓
Ticket Vending Machines	✓	✓	✓

Summary Table: Service Standards

Summary Table: Service Standards															
Metric  Low-income and non-low-income comparison by mode and for the system as a whole	≥20% difference					10%-19.99% difference					<10% difference				
	Local	Regional	Light Rail	Commuter Rail	System	Local	Regional	Light Rail	Commuter Rail	System	Local	Regional	Light Rail	Commuter Rail	System
Vehicle Loads	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Revenue Hours	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
On-Time Performance	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Vehicle Assignment	✓	✓	N/A	✓	✓	✓	✓	✓	✓	✓	✓	✓	N/A	✓	✓
Service Availability	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

# Title VI Service Performance Monitoring Report

## Distribution of Amenities (See Exhibit A for full details)

- The percentage of stops containing each amenity on low-income lines/routes exceeds the percentage for non-low-income lines/routes in all categories examined except elevators and digital displays, which are higher for non-low-income lines/routes (by 0.53% and 0.09%, respectively).
- The percentage of low-income stops containing seating is 7.17% higher than the percentage of non-low-income stops containing seating.
- The percentage of low-income stops containing lighting is 4.43% higher than the percentage of non-low-income stops containing lighting.
- The percentage of low-income stops containing shelters is 1.75% higher than the percentage of non-low-income stops containing shelters.
- The percentage of low-income stops containing signs, maps, and/or schedules is 0.99% higher than the percentage of non-low-income stops containing signs, maps, and/or schedules.
- The percentage of low-income stops containing waste receptacles is 4.05% higher than the percentage of non-low-income stops containing waste receptacles.
- The percentage of low-income stops containing ticket vending machines is 0.02% higher than the percentage of non-low-income stops containing vending machines.

## Vehicle Loads (See Exhibit B for full details)

- The percentage of trips that exceed the maximum load factor range from a low of 0.00% to a high of 3.69%.
- Local low-income midday service has a slightly higher percentage of trips that exceed the maximum load factor than local non-low-income midday service (0.41% vs. 0.36%, respectively) with a difference in vehicle loads of 0.05%.
- All average loads by mode are below the maximum load factor for every time period.

## Revenue Hours (See Exhibit C for full details)

- A greater percentage of revenue hours of bus service is provided in low-income census block groups than non-low-income census block groups (61.87% vs. 38.13%, respectively) with a difference in revenue hours of service at 23.75%.
- A greater percentage of revenue hours of light rail service are provided in low-income census block groups than non-low-income census block groups (57.26% vs. 42.74%, respectively) with a difference in revenue hours of service at 14.53%.
- A greater percentage of revenue hours of commuter rail service are provided in low-income census block groups than non-low-income census block groups (60.80% vs. 39.20%, respectively) with a difference in revenue hours of service at 21.6%.
- A greater percentage of revenue hours of all service are provided in low-income census block groups as non-low-income census block groups (61.21% vs. 38.79%, respectively) with a difference in revenue hours of service at 22.42%.

# Title VI Service Performance Monitoring Report

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

- Average OTP for low-income local bus routes is 2.86% lower than OTP for non-low-income local bus routes on weekdays. The Saturday average OTP for low-income local bus routes is 3.23% lower than OTP for non-low-income local bus routes. The Sunday average OTP for low-income local bus routes is 3.35% lower than OTP for non-low-income local bus routes.
- Average OTP for low-income regional bus routes is 1.38% greater than OTP for non-low-income regional bus routes on weekdays. The Saturday average OTP for low-income regional bus routes is 3.8% greater than OTP for non-low-income local bus routes. The Sunday average OTP for low-income regional bus routes is 0.72% lower than OTP for non-low-income regional bus routes.
- The average OTP for the two low-income light rail lines is 1.5% greater than OTP for the four non-low-income light lines for Monday-Thursday. The average Friday OTP for low-income light rail lines is 0.90% greater than the OTP for the non-low-income light rail lines. The average Saturday OTP for low-income light rail lines is 2.67% greater than the OTP for the non-low-income light rail lines. The average Sunday OTP for low-income light rail lines is 0.20% greater than the OTP for the non-low-income light rail lines.
- The average OTP for the one low-income commuter rail line is 6.60% greater for Monday-Thursday compared to the three non-low-income commuter rail lines. The average Friday OTP for low-income commuter rail lines is 7.80% greater than the OTP for the non-low-income commuter rail lines. The average Saturday OTP for low-income light rail lines is 8.33% greater than the OTP for the non-low-income commuter rail lines. The average Sunday OTP for low-income commuter rail lines is 6.50% greater than the OTP for the non-low-income commuter rail lines.

## Vehicle Assignment (See Exhibit E for full details)

- The average age of vehicles on low-income weekday bus routes (7.53 years) is about 1% less than the average age of vehicles on non-low-income weekday bus routes (7.48 years).
- The average age of vehicles on low-income weekend bus routes (7.49 years) is about 3% less than the average age of vehicles on non-low-income weekend bus routes (7.25 years).
- Light rail vehicles are randomly assigned to all lines daily. Thus, there is no difference in the average age of light rail vehicles between low-income lines and non-low-income lines.
- All 66 commuter rail vehicles were purchased in 2014. Thus, there is no difference in the average age of commuter rail vehicles between low-income lines and non-low-income lines.

## 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 rail compared to the district's non-low-income population.

# Title VI Service Performance Monitoring Report

## Exhibit A: Stop Amenities

Stop Amenities: Minority and Non-Minority

Category of Amenity	% of Stops on Minority Lines/Routes	% of Stops on Non-Minority Lines/Routes	Difference; Minority to Non-Minority +/- (-)
Seating	46.28%	44.96%	1.32%
Lighting	28.40%	23.12%	5.28%
Elevators	2.03%	2.70%	(0.67%)
Digital Displays	5.18%	4.15%	1.03%
Shelters	6.65%	9.72%	(3.07%)
Signs, Maps, and/or Schedules	4.37%	6.77%	(2.40%)
Waste Receptacles	11.01%	11.39%	(0.38%)
Ticket Vending Machines	5.21%	5.13%	0.08

Stop Amenities: Low-Income and Non-Low-Income

Category of Amenity	% of Stops on Low-Income/Routes	% of Stops on Non-Low-Income Lines/Routes	Difference; Low-Income to Non-Low-Income +/- (-)
Seating	48.82%	41.65%	7.17%
Lighting	27.77%	23.34%	4.43%
Elevators	2.13%	2.66%	(0.53%)
Digital Displays	4.63%	4.72%	(0.09%)
Shelters	8.94%	7.19%	1.75%
Signs, Maps, and/or Schedules	5.99%	5.00%	0.99%
Waste Receptacles	13.00%	8.95%	4.05%
Ticket Vending Machines	5.18%	5.16%	0.02%

# Title VI Service Performance Monitoring Report

## Exhibit B: Vehicle Loads

Vehicle Loads Table: Minority and Non-Minority

Mode of Service	Time Period	Minority	Non-Minority	Difference Minority to Non-Minority +/-(-)
Local	Peak (125%)	0.19%	0.43%	0.24%
	Midday (100%)	0.29%	0.69%	0.40%
Bus Rapid Transit	Peak (100%)	N/A	3.23%	N/A
	Midday (100%)	N/A	0.00%	N/A
Regional	Peak (100%)	0.19%	0.22%	0.03%
	Midday (100%)	0.00%	7.45%	0.10%
Skyride	Peak (100%)	0.00%	4.87%	4.87%
	Midday (100%)	0.77%	7.45%	6.68%
Commuter Rail	Peak (100%)	0.09%	0.28%	0.19%
	Midday (100%)	0.05%	0.00%	(0.5%)
Light Rail	Peak (100%)	2.03%	4.60%	2.57%
	Midday (100%)	0.18%	0.27%	0.90%

Vehicle Loads Table: Low-Income and Non-Low-Income

Mode of Service	Time Period	Low-Income	Non-Low-Income	Difference; Low-Income to Non-Low-Income +/-(-)
Local	Peak (125%)	0.25%	0.31%	0.06%
	Midday (100%)	0.41%	0.36%	(0.05%)
Bus Rapid Transit	Peak (100%)	N/A	3.23%	N/A
	Midday (100%)	N/A	0.00%	N/A
Regional	Peak (100%)	0.00%	0.27%	0.27%
	Midday (100%)	0.00%	0.08%	0.08%
Skyride	Peak (100%)	2.74%	N/A	N/A
	Midday (100%)	3.57%	N/A	N/A
Commuter Rail	Peak (100%)	0.00%	0.16%	0.16%
	Midday (100%)	0.00%	0.04%	0.04%
Light Rail	Peak (100%)	0.06%	3.69%	3.63%
	Midday (100%)	0.00%	0.26%	0.26%

# Title VI Service Performance Monitoring Report

## Exhibit C: Revenue Hours

Revenue Hours Table: Minority and Non-Minority

Mode of Service	Minority Hours	Non-Minority Hours	Difference; Minority to Non-Minority +/(-)
Bus	42.88%	57.10%	(14.25%)
Light Rail	46.40%	53.6%	(7.20%)
Commuter Rail	81.04%	18.96%	62.07%
System	45.23%	54.77%	(9.54%)

Revenue Hours Table: Low-Income and Non-Low-Income

Mode of Service	Low-Income Hours	Non-Low-Income Hours	Difference; Low-Income to Non-Low-Income +/(-)
Bus	61.87%	38.13%	23.75%
Light Rail	57.26%	42.74%	14.53%
Commuter Rail	60.80%	39.20%	21.60%
System	61.21%	38.79%	22.42%



# Title VI Service Performance Monitoring Report

## Exhibit D: On-Time Performance

On-Time Performance Table: Minority and Non-Minority

		Avg. % On-Time (weighted)		
Mode of Service	Day	Minority Lines/Routes	Non-Minority Lines/Routes	Difference; Minority to Non-Minority +/-
Local Bus	Weekday	84.69%	86.36%	(1.67%)
	Saturday	85.53%	86.59%	(1.06%)
	Sunday	86.03%	89.15%	(3.12%)
Regional Bus	Weekday	93.26%	82.88%	10.38%
	Saturday	97.50%	82.76%	14.74%
	Sunday	96.53%	83.25%	13.28%
Light Rail	Mon-Thurs	91.85%	92.90%	(1.05%)
	Friday	90.53%	93.00%	(2.48%)
	Saturday	92.28%	93.30%	(1.03%)
	Sunday	91.98%	94.20%	(2.23%)
Commuter Rail	Mon-Thurs	91.76%	91.70%	0.06%
	Friday	91.33%	92.70%	(1.37%)
	Saturday	92.50%	90.30%	2.20%
	Sunday	93.00%	92.70%	0.30%

# Title VI Service Performance Monitoring Report

On-Time Performance Table: Low-Income and Non-Low-Income

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Low Income to Non-Low-Income +/-
		Low-Income Lines/Routes	Non-Low-Income Lines/Routes	
Local Bus	Weekday	84.36%	87.22%	(2.86%)
	Saturday	84.96%	88.19%	(3.23%)
	Sunday	85.96%	89.30%	(3.35%)
Regional Bus	Weekday	87.58%	86.20%	1.38%
	Saturday	90.20%	86.40%	3.80%
	Sunday	88.53%	89.25%	(0.72%)
Light Rail	Mon-Thurs	93.20%	91.70%	1.50%
	Friday	91.95%	91.05%	0.09%
	Saturday	94.40%	91.73%	2.67%
	Sunday	92.85%	92.65%	0.20%
Commuter Rail	Mon-Thurs	96.70%	90.10%	6.60%
	Friday	97.50%	89.70%	7.80%
	Saturday	98.20%	89.87%	8.33%
	Sunday	97.80%	91.30%	6.50%

# Title VI Service Performance Monitoring Report

## Exhibit E: Vehicle Assignment

In the past, RTD has been unable to examine vehicle assignments consistently or accurately. This is because bus vehicle assignments are put together in blocks that typically consist of operations on multiple routes (referred to as interlining or through lining), making it impossible to assign buses on a specific route and therefore rendering an analysis of vehicle assignment difficult.

However, in 2022, RTD produced a methodology to pursue the vehicle assignment analysis. The analysis utilizes service “recap” data and relies on making key assumptions. It includes *typical* vehicle type and garage assignments by route; service equity classification (i.e., low-income or non-low-income and minority or non-minority) of routes based on in-service hours as well as geographic demographic data; and vehicle age data, by vehicle type and assigned garage.

Equity and non-equity routes are first identified by their *typically* assigned garage, then with known *typically*-assigned vehicles, the average age of vehicles is assigned. The overall average vehicle ages are then compared between equity and non-equity routes to ensure equity routes are within an acceptable threshold range of difference.

For light rail and commuter rail, there is no specific alignment for a certain model or year. Additionally, all 66 commuter rail vehicles were purchased in 2014, leaving no difference in the average age of commuter rail vehicles between equity and non-equity routes.

Vehicle Assignment Table: Minority and Non-Minority

		Avg. Vehicle Age (Years)		
Mode of Service	Day	Minority Routes and Lines	Non-Minority Routes and Lines	Difference; Minority to Non-Minority +/- (-)
Bus (Local and Regional)	Weekday	6.92	8.46	18%
	Weekend	6.87	8.47	19%
Light Rail	Light rail vehicles are randomly assigned to all lines daily. Thus, there is no difference in the average age of light rail vehicles between minority lines and non-minority lines.			
Commuter Rail	All 66 commuter rail vehicles were purchased in 2014. Thus, there is no difference in the average age of commuter rail vehicles between minority lines and non-minority lines.			

# Title VI Service Performance Monitoring Report

Vehicle Assignment Table: Low-Income and Non-Low-Income

		Avg. Vehicle Age (Years)		
Mode of Service	Day	Low-Income Routes and Lines	Non-Low-Income Routes and Lines	Difference; Low-Income to Non-Low-Income +/-
Bus (Local and Regional)	Weekday	7.53	7.48	1%
	Weekend	7.49	7.25	3%
Light Rail	Light rail vehicles are randomly assigned to all lines daily. Thus, there is no difference in the average age of light rail vehicles between low-income lines and non-low-income lines.			
Commuter Rail	All 66 commuter rail vehicles were purchased in 2014. Thus, there is no difference in the average age of commuter rail vehicles between low-income lines and non-low-income lines.			

# Title VI Service Performance Monitoring Report

Exhibit F: Service Availability Table

Demographic Analysis of Proximity to RTD Service (Percent)		RTD District	RTD District	% within ½* Mile			% within ¼ Mile	% within 3 Miles	Frequent All Day Service within ½ Mile		Frequent Peak and/or Midday Service within ½ Mile	
		Totals	Merged Buffers	Limited	Regional	Rail	Local Bus	Commuter Rail	Bus	Bus & Rail	Bus	Bus & Rail
Population	Total (ACS 5-year estimate, 2017-2021)	3,044,872	59.3%	14.8%	9.1%	7.4%	48.5%	30.3%	26.7%	29.7%	28.7%	31.7%
Minority	All Minorities	1,126,338	68.0%	18.1%	7.7%	8.5%	57.1%	40.2%	32.1%	35.4%	35.1%	38.5%
Non-Minority	White (Non-Hispanic)	1,918,535	54.1%	12.9%	9.9%	6.7%	43.4%	24.5%	23.6%	26.3%	25.0%	27.7%
Population	Total population with known income (ACS 5-year estimate, 2017-2021)**	3,001,396	59.1%	14.9%	8.9%	7.3%	48.3%	30.4%	26.4%	29.3%	28.5%	31.4%
Low-Income	Below 150% of Poverty Level	429,348	72.9%	18.3%	11.6%	10.3%	63.1%	39.1%	37.2%	41.0%	39.0%	42.8%
Non-Low-Income	Above 150% of Poverty Level	2,572,048	56.8%	14.3%	8.5%	6.8%	45.9%	28.9%	24.6%	27.4%	26.7%	29.5%
<b>Sources:</b> RTD GTFS GIS, US Census American Community Survey Tables: 2017 - 2021 (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.												

# **RTD 2025-2028 Title VI Program**

## **Attachment X: Transit Service Policies and Standards**

DRAFT

# **RTD 2025-2028 Title VI Program**

## **Attachment Y: Title VI Proposed Policy Change Feedback**

DRAFT

## 2025-2028 Title VI Program Update Proposed Policy Change Feedback

Major Service Change Policy
Thumbs up
This change is great. It's confusing to understand but I get it now. I like it.
The Denver NAACP appreciates RTD's commitment to ensuring equitable access to public transit and mitigating potential disparities affecting BIPOC and low-income communities.
After reviewing the proposed updates to the Major Service Change Policy, we fully support these changes and believe they will strengthen transit equity across the region. Thank you!
Son para mejorar
So that RTD does not make changes so easily. Love it
RTD SUCKS!
RTD does not provide equitable service to my area. People who have no transportation can only travel on weekdays, but only as long as it is not a holiday.
It sounds good based on my limited understanding of the proposed changes. If I had a more nuanced understanding I may agree or disagree more strongly.
I think this plan would be more equitable and responsive to the needs of all communities than the former plan.
I think the expansion, especially to cover impacts of 36 months of service changes is positive.
I think that's a large enough change to affect people, smaller percentage, fewer people. RTD has to do the most good for the most people.
I think it's a great idea, but I know that RTD has issues with communication. I think it would be better to be <25%, but I understand the challenge that could present RTD.
I think it would limit the ability to make changes that best fit the needs of frequent riders
I support expanding the definition of a major change to include periods shorter than 12 months, especially given the tri-annual service changes that occur. I would also ask that "unplanned" or "unofficial" schedule/service changes (for example the SE corridor light rail slowdowns that started June 2024, or the route 19/52 detours on the way out of downtown Denver) be eligible to be evaluated as "major changes", as I think it is beneficial to allow these impacts to trigger an equity analysis, in order to help prioritize fixes and restoration of service where there is a disproportionate burden caused by unplanned service disruptions.
I am concerned that the cumulative change period of 36 months may not be enough time for census data to be updated to account for changes in population/demographics, and therefore progressive service changes that are in response to population/demand evolution over this 36 month period would end up being analyzed against outdated data that did not keep pace with the actual population/demographic changes that the service change is responding to.
I do not support this policy change because changing the criteria behind major service changes will result in more route changes requiring equity analyses. Does RTD have the staff capacity to perform more reviews?
Bipoc as well as pWD should always be considered when big changes are happening!

Disproportionate Burden Policy (Low Income)
With the current economy, any changes to better identify low incomes helps.
This is beneficial because Im low income
This is also great. This was explained clearly and I fully support this change.
This a good step in the right direction but still a very conservative definition of low income. I worked on Boulder's guaranteed income pilot project and we grappled with defining low income too. Our conclusion was that 40k-50k per year was our definition of low income and I suggest that RTD use a more inclusive definition of low income to include households that make at least 50k or less per year



The incomes considered certainly qualify as low-income. Much of my work is around affordable housing, which uses the Area Median Income as the basis of affordability. I am wondering if RTD is required to use the federal poverty level, or if using a regional AMI would lead to more realistic income levels.
The Denver NAACP appreciates RTD's commitment to ensuring equitable access to public transit and mitigating potential disparities affecting BIPOC and low-income communities.
After reviewing the proposed updates to the Low-Income Definition, we fully support these changes and believe they will strengthen transit equity across the region. Thank you!
RTD SUCKS!
Redefining the guidelines to align with a broader poverty threshold seems like an important first step for creating more equitable programs in the future. Agree.
Probably not enough people for the help that's needed but, it's great that you've done this.
My dad used to be able to raise a family of 6 off of a 65K salary. You'd be homeless if that were the case today.
More for the people. This is better.
It's a good idea
It would help more people ride RTD.
It is certainly great that we are increasing the threshold to cover more people. I also think that with the Denver metro being a bit more expensive than the "federal standard", it may make sense to check with Denver income metrics and set the standards based more on that.
I want to know how much it will cost the taxpayers first. Sounds wonderful but I think we need all the details! What is the cost?
I support increasing the threshold used to define "low-income", however I do not think 200% of the HHS poverty guidelines is a high enough cutoff. In the city of Denver, a worker making minimum wage (\$18.81/hr) and working full-time (40 hr/week) for 50 weeks out of the year would not be counted as low-income using this metric (\$37,620 annual income vs \$30,120 cutoff for a single-person household). I would strongly advocate for ensuring that the metric used to determine "low income" includes workers making at or near minimum wage, especially given the amount of low-wage shift-work jobs that require transportation to/from work at early/late hours where RTD's service is historically more limited. I suggest changing the definition to be more in line with how affordable housing in the area is treated, using something in the range of 50-80% AMI
Additionally, if there is any way to define a "low-income" workplace based on median hourly wages, I believe that would be extremely beneficial in categorizing not only where people live but also where they work to better match equity analysis activities to travel patterns.
I agree because it is a move in the right direction. I hope that we can continue to increase this limit. As the federal government does consider 30% AMI, close to 200% FPL, extremely low income; 50% AMI (\$46,650 for a family of 1) very low income; and 80% AMI (\$71,900 for a family of 1) low income in Jefferson County, Colorado.
Better support for those impacted by lower incomes.
As long as it is to improve and stable and doesn't keep affecting us

<b>Fare Equity Policy</b>
Yes because now federal bus now only goes to 62nd.
The Denver NAACP appreciates RTD's commitment to ensuring equitable access to public transit and mitigating potential disparities affecting BIPOC and low-income communities.
After reviewing the proposed updates to the Fare Equity Policy, we fully support these changes and believe they will strengthen transit equity across the region. Thank you!
Thank you! I enjoy this change.
Sometimes some people don't go places. Its better
RTD SUCKS!
Need free rides because i don't have cash. I'm poor so why doe sit matter it the change if no free rides.

It helps.
I like this because we need better fares and need changes that will not affect
I agree with the changes as stated, but I also wonder if fare collection/enforcement would benefit from inclusion here too. For example, if a large fine is imposed for fare evasion that may become a disproportionate burden on someone who was struggling to afford the fare in the first place. Treating on-the-spot fare collection as the default behavior (or other methods that I'm not considering here) for fare enforcement instead of fines would potentially lead to more equitable outcomes, especially if coupled with robust marketing campaigns around LiVE fare eligibility and enrollment.
Good idea. I'd like to learn more about fare equity across rtd regions, and the state.
Good for us
As long as machines can always take cash, that's great.
Agree that cash should still be supported!