

2025-2028 Title VI Program Update

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





2025-2028 Title VI Program Update

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Table of Contents

Acronyms	2
Definitions	2
Introduction.....	4
General Requirements	5
<i>Title VI Public Notice</i>	6
Title VI Statement.....	6
Title VI Public Notice in RTD Vehicles.....	6
Title VI Public Notice in Sales Outlets.....	9
Other Civil Rights Information	10
<i>Title VI and CRS §24-34-601 Complaint Procedures</i>	12
<i>List of Title VI Investigations, Complaints, and Lawsuits</i>	13
Investigations	13
Lawsuits.....	13
Complaints	13
Training to Enhance Service Delivery and Compliance	13
<i>Public Participation Plan: Overview</i>	16
<i>Language Access Plan: Overview</i>	16
<i>Subrecipient Monitoring</i>	16
General Requirements.....	16
Smart Commute Metro North.....	17
Transit-related Contractors.....	17
<i>Equity Analysis for Facilities Siting and Construction</i>	18
Siting Facility Statement	18
Facility Siting Framework.....	18
Standard Process for Facility Siting and Construction	19
<i>Requirements for Fixed-Route Transit Providers</i>	21
<i>Title VI Program Policies</i>	21
Changes from the 2022-2025 Title VI Program Policies	21
Service Equity Analyses	22
Fare Equity Analyses	24
<i>Equity Analyses of Major Service and Fare Changes Since 2022 Submission</i>	25
<i>Service Performance Monitoring</i>	25
<i>Demographic Analysis</i>	26
Current Network and Service Area.....	26
Ridership Data: 2024 Onboard Survey	31
Facilities and Demographics Assessment.....	53

RTD 2025-2028 Title VI Program

Description of Engagement Efforts to Update Title VI Program	66
<i>Engagement Efforts on the Overall Title VI Program Update.....</i>	66
<i>Engagement Efforts on the Language Access Plan.....</i>	67
<i>Engagement Efforts on Title VI Policy Changes.....</i>	67
Title VI Program Policies Survey Results.....	68
Attachments	73
<i>Attachment A: Board Approval of 2025-2028 Title VI Program.....</i>	73
<i>Attachment B: Title VI Complaint Forms</i>	85
<i>Attachment C: Transit Equity Nondiscrimination Policy.....</i>	153
<i>Attachment D: Transit Equity Complaint Management Procedures.....</i>	157
<i>Attachment E: Public Participation Plan</i>	167
<i>Attachment F: Language Access Plan</i>	290
<i>Attachment G: Subrecipient Compliance Guide</i>	448
<i>Attachment H: Smart Commute Metro North Concurrence Letter</i>	458
<i>Attachment I: Smart Commute Metro North Signed Title VI Policy Statement</i>	460
<i>Attachment J: Allied Universal Title VI Concurrence Letter</i>	462
<i>Attachment K: Denver Transit Partners Title VI Concurrence Letter</i>	464
<i>Attachment L: Transdev Title VI Concurrence Letter</i>	466
<i>Attachment M: MTM Transit Title VI Concurrence Letter.....</i>	468
<i>Attachment N: May 2025 Service Equity Analysis</i>	470
<i>Attachment O: January 2025 Service Equity Analysis</i>	538
<i>Attachment P: September 2024 Service Equity Analysis.....</i>	609
<i>Attachment Q: Zero Fare for Youth Fare Equity Analysis</i>	655
<i>Attachment R: May 2024 Service Equity Analysis</i>	739
<i>Attachment S: September 2023 Service Equity Analysis.....</i>	788
<i>Attachment T: Systemwide Fare Study and Equity Analysis.....</i>	832
<i>Attachment U: May 2023 Service Equity Analysis</i>	981
<i>Attachment V: January 2023 Service Equity Analysis.....</i>	1029
<i>Attachment W: MyRide Stored Value Discount Fare Equity Analysis</i>	1071
<i>Attachment X: 2022 Service Performance Monitoring Report</i>	1111
<i>Attachment Y: Transit Service Policies and Standards</i>	1131
<i>Attachment Z: Feedback Received on Title VI Program Update.....</i>	1165

RTD 2025-2028 Title VI Program

Acronyms

ACS	American Community Survey
BIPOC	Black, Indigenous, and People of Color
CFR	Code of Federal Regulations
CRS	Colorado Revised Statute
DOT	Department of Transportation
LAP	Language Access Plan
LEP	Limited English Proficiency or Limited English Proficient
RTD	Regional Transportation District
FTA	Federal Transit Administration
USDOT	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.

RTD 2025-2028 Title VI Program

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.

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’s 2025-2028 Title VI Program, 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**.

RTD 2025-2028 Title VI Program

Minority Transit Route – 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**.

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

RTD 2025-2028 Title VI Program

prevent minority people (hereafter referred to as Black, Indigenous and People of Color, or BIPOC) and people with limited English proficiency (LEP)¹ 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 people 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 This document will hereafter refer to "people with limited English proficiency" or "limited English proficient people" as "linguistically diverse people" to the extent possible.

RTD 2025-2028 Title VI Program

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. List of Title VI Investigations, Complaints, and Lawsuits
4. Public Participation Plan
5. Language Access Plan
6. 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 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; or visit 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; or visit rtd-denver.com/titlevi. Please allow up to three (3) business days for a response.

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

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

RTD RESPETA LOS DERECHOS CIVILES

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

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



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

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



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; or visit rtd-denver.com/titlevi.

RTD respeta los derechos civiles

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

RTD 尊重民权

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

RTD Tôn Trọng Các Quyền Dân Sự

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



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; or visit rtd-denver.com/titlevi. Please allow up to three (3) business days for a response.

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

THÔNG BÁO VỀ 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.



TITLE VI

RTD RESPETA LOS DERECHOS CIVILES

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

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

ACCESSIBLE BY CHOICE, NOT BY CHANCE.

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.



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; or visit 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.

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; o visite rtd-denver.com/accessibility. Por favor, deje transcurrir tres (3) días hábiles para que la comunicación sea efectiva.



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; or visit 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; o visite 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; hoặc truy cập 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；或访问 rtd-denver.com/titlevi。三 (3) 个工作日内回复。



Learn more at 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)

RTD

Nine Mile Station

83D/L

Cherry Creek
Parker Road

121

Pikes Peak

130

Valley View

133

Hampden/Town

135

Stony Hill Road

139


Delaney Avenue

AT

Angeline Court/
Dennis Avenue

483

Parker Road
Larimer Ave



Scan here for full
service bus and services.
Become a rider pass
to receive the benefits
of service.

Monday-Friday
Larimer-Valerius

Route	Stop	Time	Direction
83D/L	Cherry Creek	6:00 AM	Northbound
83D/L	Parker Road	6:15 AM	Northbound
121	Pikes Peak	6:30 AM	Northbound
130	Valley View	6:45 AM	Northbound
133	Hampden/Town	7:00 AM	Northbound
135	Stony Hill Road	7:15 AM	Northbound
139	Delaney Avenue	7:30 AM	Northbound
AT	Angeline Court/ Dennis Avenue	7:45 AM	Northbound
483	Parker Road Larimer Ave	8:00 AM	Northbound

Route	Stop	Time	Direction
83D/L	Cherry Creek	6:00 AM	Southbound
83D/L	Parker Road	6:15 AM	Southbound
121	Pikes Peak	6:30 AM	Southbound
130	Valley View	6:45 AM	Southbound
133	Hampden/Town	7:00 AM	Southbound
135	Stony Hill Road	7:15 AM	Southbound
139	Delaney Avenue	7:30 AM	Southbound
AT	Angeline Court/ Dennis Avenue	7:45 AM	Southbound
483	Parker Road Larimer Ave	8:00 AM	Southbound

Saturday
Sub-ado

Route	Stop	Time	Direction
83D/L	Cherry Creek	6:00 AM	Northbound
83D/L	Parker Road	6:15 AM	Northbound
121	Pikes Peak	6:30 AM	Northbound
130	Valley View	6:45 AM	Northbound
133	Hampden/Town	7:00 AM	Northbound
135	Stony Hill Road	7:15 AM	Northbound
139	Delaney Avenue	7:30 AM	Northbound
AT	Angeline Court/ Dennis Avenue	7:45 AM	Northbound
483	Parker Road Larimer Ave	8:00 AM	Northbound


Route	Stop	Time	Direction
83D/L	Cherry Creek	6:00 AM	Southbound
83D/L	Parker Road	6:15 AM	Southbound
121	Pikes Peak	6:30 AM	Southbound
130	Valley View	6:45 AM	Southbound
133	Hampden/Town	7:00 AM	Southbound
135	Stony Hill Road	7:15 AM	Southbound
139	Delaney Avenue	7:30 AM	Southbound
AT	Angeline Court/ Dennis Avenue	7:45 AM	Southbound
483	Parker Road Larimer Ave	8:00 AM	Southbound

Sunday/Holiday
Domingo/Parados

Route	Stop	Time	Direction
83D/L	Cherry Creek	6:00 AM	Northbound
83D/L	Parker Road	6:15 AM	Northbound
121	Pikes Peak	6:30 AM	Northbound
130	Valley View	6:45 AM	Northbound
133	Hampden/Town	7:00 AM	Northbound
135	Stony Hill Road	7:15 AM	Northbound
139	Delaney Avenue	7:30 AM	Northbound
AT	Angeline Court/ Dennis Avenue	7:45 AM	Northbound
483	Parker Road Larimer Ave	8:00 AM	Northbound


Route	Stop	Time	Direction
83D/L	Cherry Creek	6:00 AM	Southbound
83D/L	Parker Road	6:15 AM	Southbound
121	Pikes Peak	6:30 AM	Southbound
130	Valley View	6:45 AM	Southbound
133	Hampden/Town	7:00 AM	Southbound
135	Stony Hill Road	7:15 AM	Southbound
139	Delaney Avenue	7:30 AM	Southbound
AT	Angeline Court/ Dennis Avenue	7:45 AM	Southbound
483	Parker Road Larimer Ave	8:00 AM	Southbound

Have security or safety concerns?
Download RTD Transit Watch now




Transit for Everyone

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




STANDARD FARES

2-hour Pass \$2.75
Day Pass \$5.50
3-day Pass \$16.50




DISCOUNT FARES

2-hour Pass \$1.38
Day Pass \$2.75
3-day Pass \$8.25




RTD MyRide

Download the app to use your RTD MyRide card.



RESPECT THE RIDE

To ensure a pleasant transit experience for everyone, please be courteous to all RTD customers and employees.



7 JANUARY 2024 - 7 DE ENERO DE 2024

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10

rtd-denver.com

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.



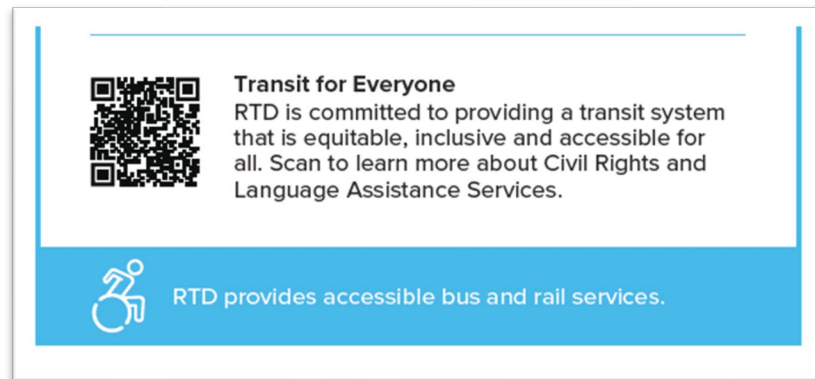


Figure 7. An Example Printed Schedule Including a Civil Rights Statement (Center)



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 the 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 parties involved, 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 of 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 23.6%, from 106 in 2019-2022 to 81 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. 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

Training 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
March 31, 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 their 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:

- 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

RTD 2025-2028 Title VI Program

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.

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

RTD 2025-2028 Title VI Program

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

<div>1</div> <div>Planning and Preliminary Site Identification</div>	<ul style="list-style-type: none"> • Identify potential locations based on RTD's operational needs and long-term goals • Perform Level 1 screening to eliminate sites with critical issues, including: <ul style="list-style-type: none"> ◦ Zoning restrictions prohibiting transit facilities ◦ Environmental hazards (e.g., flood zones, contamination risks) ◦ Inadequate parcel size for operational needs ◦ Proximity to sensitive land uses (e.g., schools, residential areas) • 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)
<div>2</div> <div>Alternatives Analysis and Site Shortlisting</div>	<ul style="list-style-type: none"> • Evaluate a short list of siting alternatives (including a no-build alternative), as required by FTA Circular 4702.1B • Use a tiered evaluation system to screen and rank sites: <ul style="list-style-type: none"> ◦ Tier A (Critical Factors): Location, bus operating cost/deadhead impacts, road access, zoning compatibility, and equity considerations ◦ Tier B (Infrastructure Feasibility): Utility access, parcel ownership, acquisition costs, and development feasibility ◦ Tier C (Environmental Considerations): Noise, air quality, traffic impact, historic preservation, wetlands, and floodplain risks • Conduct an Alternatives Analysis based on: <ul style="list-style-type: none"> ◦ Equity factors: Demographics, displacement risks, and cumulative impacts ◦ Operational feasibility: Accessibility, utility availability, and road connectivity

RTD 2025-2028 Title VI Program

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

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 Program 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 Program 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 Program 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 American Community Survey (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

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."

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 months²
- The implementation of a new route/line

² 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

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."

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.

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.

RTD 2025-2028 Title VI Program

First, RTD identifies the service changes which meet the threshold established in the major service change policy.³ 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.⁴ 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.⁵

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).

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

⁴ Ibid.

⁵ 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

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

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 5% more than the overall ridership, this level of impact is considered a **disparate impact**. If a fare change affects low-income populations 5% more than overall ridership, 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 (SAFE) Analyses conducted since the last Title VI Program update are located in **Attachments N-W**. Please note, SAFE Analyses (Attachments O-W) were completed prior to January 2025 and include references to a rescinded regulatory directive.

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. A disparate impact finding on BIPOC populations 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 finding. Since low-income populations are not a protected class under Title VI, RTD will consider opportunities to reduce the potential effects where practicable.

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

Demographic Analysis

According to FTA Circular 4702.1B, Chapter VI, Sections 7-8, RTD is required to collect and report demographic and service profile maps and charts using U.S. Census data, as well as customer demographics and travel patterns through origin–destination or customer satisfaction surveys. 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 population data (from the U.S. Census) and ridership data (from the 2024 onboard survey) 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 ACS, provide insight into transit access for these populations.

RTD 2025-2028 Title VI Program

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.

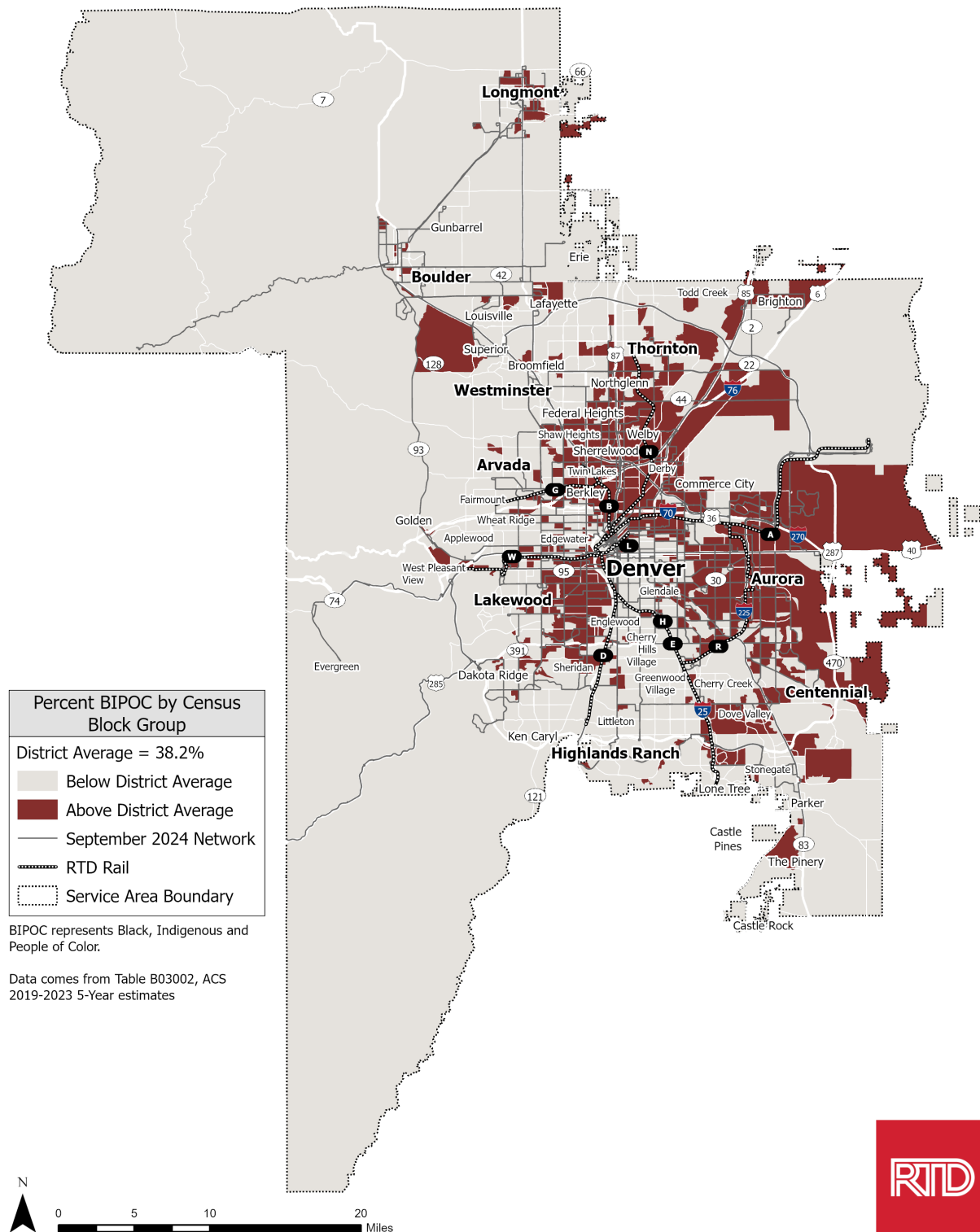
Figure 12 illustrates the RTD network in relation to low-income populations by census block group. Low-income is defined as earning 150% or less of the Department of Health and Human Services (HHS) federal poverty level. Areas are shaded to indicate block groups where the low-income population meets 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.

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**.

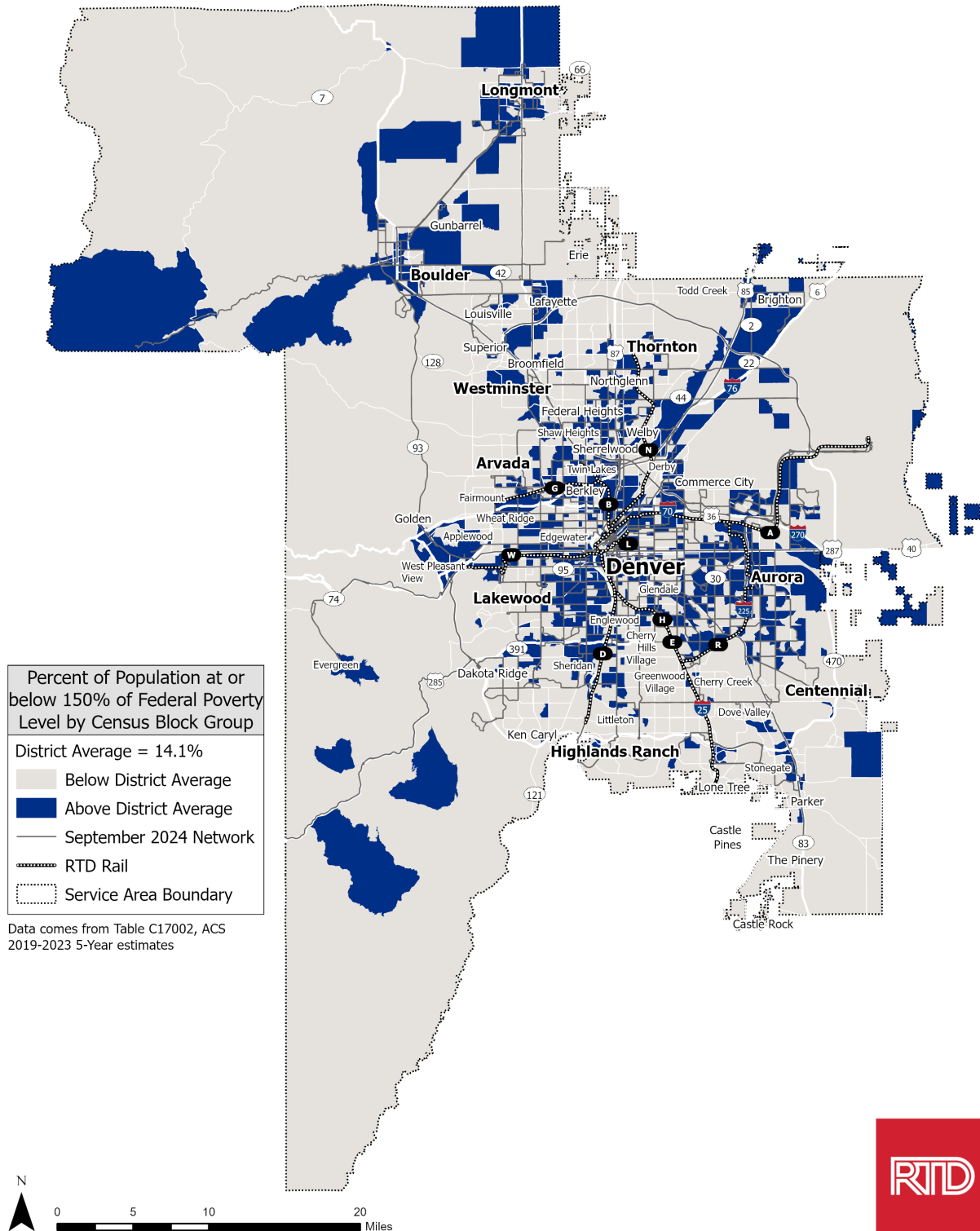
RTD 2025-2028 Title VI Program

Figure 11. RTD Network and Service Area with BIPOC



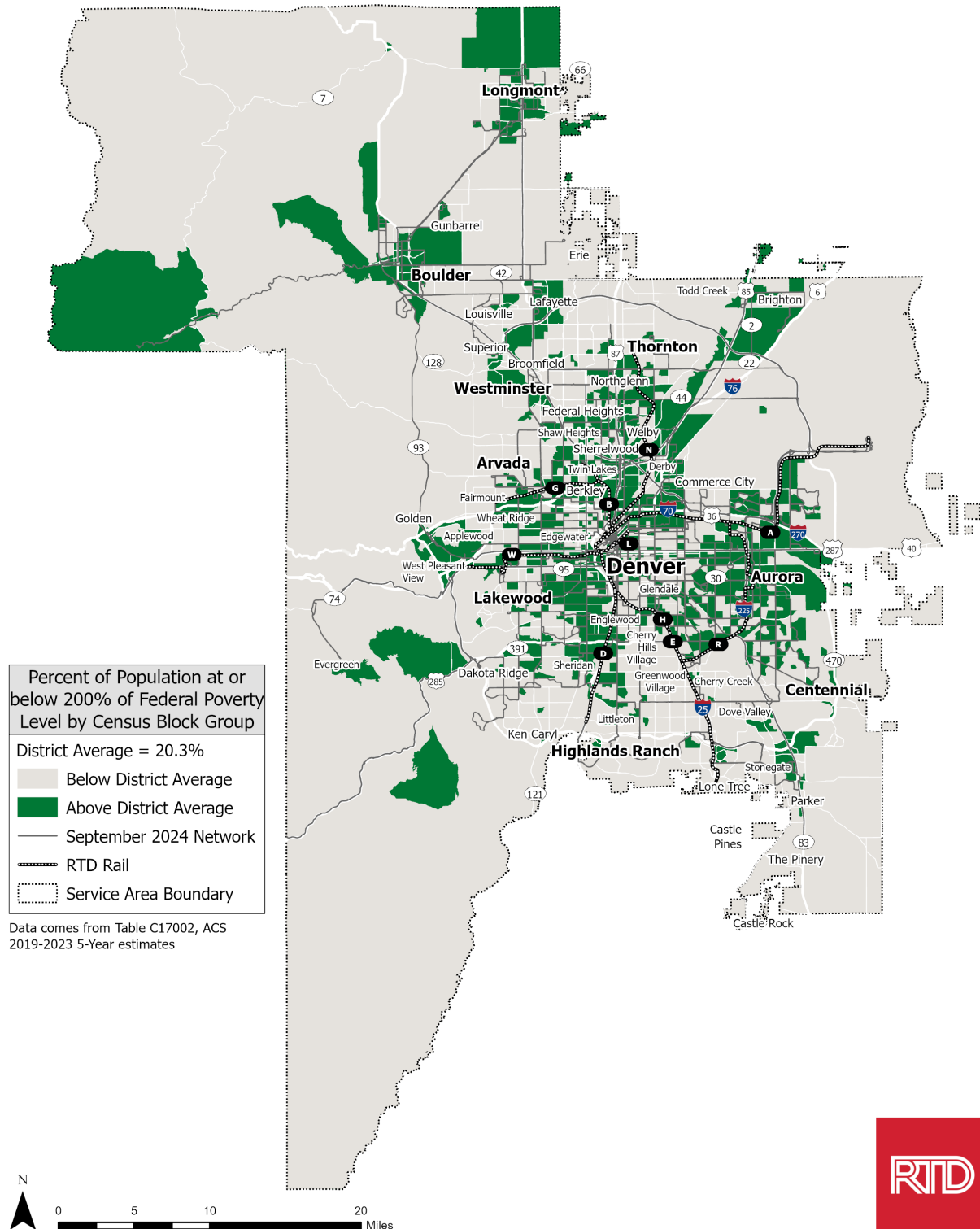
RTD 2025-2028 Title VI Program

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

Ridership Data: 2024 Onboard Survey

Methodology

From August 19 to December 10, 2024, RTD conducted a systemwide onboard customer survey providing a snapshot of weekday trip characteristics across 99 bus routes and 10 rail lines with 18,285 customer responses (excluding visitors). The survey resulted in 66% sample of trips for bus and 33% sample for rail. Data is weighted⁶ to the estimated weekday ridership of 170,000 originating rides. The snapshot also provides data on customer demographics of all ages including household income, race/ethnicity, and spoken language(s).

The sample is large and helps provide a description of the variability and diversity among RTD customers. To aid the comparisons in this report, two statistical tests were performed to determine if the results are reliable or due to chance. Chi-square tests⁷ found a statistically significant association between race or ethnicity by income plus customer onboard time of day and frequency of ridership by income. Two proportion Z-tests⁸ found statistically significant differences between customers that identify as BIPOC or non-BIPOC in relationship to having a valid driver's license, transfers per trip, owning a vehicle, and rail or bus vehicle mode. Testing low-income by non-low-income customers realized statistically significant differences in having a valid driver's license, transfers per trip, owning a vehicle, and rail or bus vehicle mode.

Race/ethnicity and income are compared in the following pages and called out with an asterisk (see graphs) when significantly significant.

Key Findings

The result of the onboard survey provides a rich illustration of RTD weekday ridership characteristics, emphasizing the travel behaviors and transit dependencies of low-income⁹ and BIPOC customers.

- Customer Characteristics: BIPOC, low-income, and linguistically diverse customers responded to the onboard survey at much higher rates than their district averages. Generally, the majority of RTD customers are BIPOC, with only 44% identifying as white — well below the regional average. Notably, customers identifying as Black or African American are onboard at nearly four times their district average. More than half of BIPOC respondents (53%) are under the age of 35. Additionally, 58% of the customers identify as men.
- Travel Behavior: The vast majority of respondents report they are frequent/regular (95%) use of RTD transit services. BIPOC (69%) and low-income (73%) customers are the most frequent, indicating near-daily use. These groups report higher bus ridership and lower rail ridership when comparing them to the overall average and are more likely to require transfers to complete their trips. Among low-income respondents, over half (53%) board transit during the midday period (9 am-3 pm).
- Transit Dependency: Survey responses indicate a high level of transit dependency among BIPOC and low-income customers. Fewer than half of BIPOC respondents (47%) and only 39% of low-income respondents have a valid driver's license. While 57% of all customers indicate they have access to a household vehicle, only 39% of low-income respondents report the same. Even among those with vehicle

⁶ Weighting and expanding survey data are crucial steps in market research to ensure your findings accurately represent the target population and allow for more reliable generalizations. Weighting adjusts for discrepancies in the sample's demographics compared to the population, while expansion helps you translate sample findings into estimates for the entire population.

⁷ Chi-Square test is a statistical test used to determine if there's a significant relationship between two categorical variables or if observed data significantly deviates from expected data

⁸ Two-proportion Z-test is a statistical test used to compare the proportions of two different populations

⁹ For the purposes of this demographic analysis, the Transit Equity Office used both 150% and 200% thresholds of the U.S. Department of Health and Human Services (HHS) poverty guidelines to examine survey results, aligning with the 2022-2025 Title VI Program's previous, and the 2025-2028 Title VI Program's updated, definition for low income.

RTD 2025-2028 Title VI Program

access, nearly two-thirds of BIPOC and low-income customers say they could not use a vehicle for the trip they were making at the time of the survey. Overall, just 27% of customers say they have a vehicle available and could have used it for the surveyed trip.

- Fare Payment: BIPOC and low-income customers are more likely to use the 3-hour pass or single trip fare at slightly higher rates than their counterparts. Approximately 14% of the customers report using a discounted fare product such as for LiVE (income-based) program participants, seniors, Medicare recipients, or individuals with disabilities. BIPOC and low-income customers are also significantly more likely to pay cash onboard and report below-average access to debit or credit cards.

Results: Using 150% Federal Poverty Level for Income

In the first portion of the onboard survey results, the Transit Equity Office used the 2022-2025 Title VI Program's definition for low income, defined as a person whose median household income is at or below 150% of U.S. Department of Health and Human Services (HHS) poverty guidelines. Please read Results: Using the 200% Federal Poverty Level for Income below for data that uses the 200% federal poverty level per the updated threshold in the 2025-2028 Title VI Program.

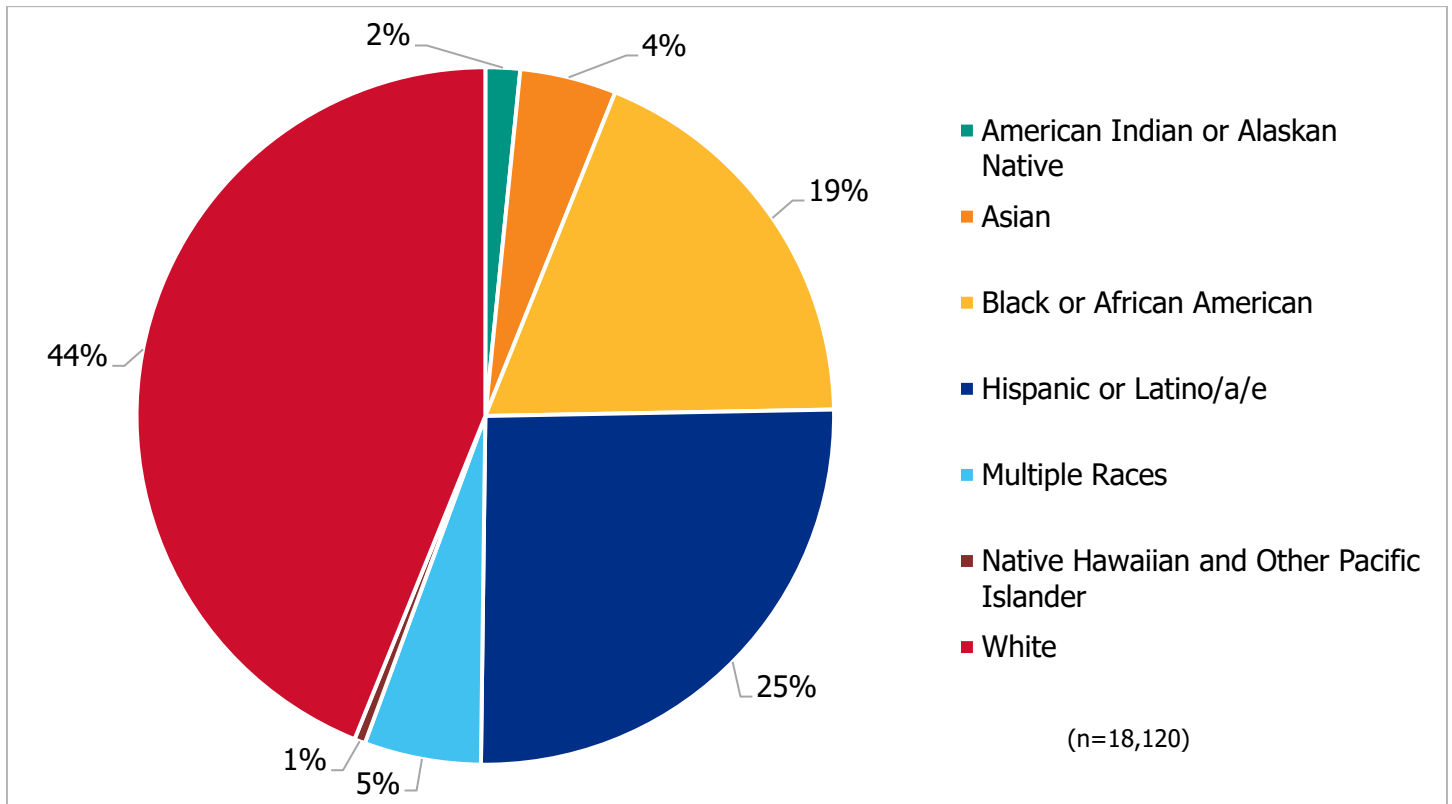
Customer Characteristics

Race or Ethnicity

The racial or ethnic breakdown of customers in the onboard survey is displayed in Figure 14. There are two notable differences between the customers in this sample and the demographic breakdown of the RTD service area, as derived from 2019-2023 ACS five-year estimates. First, customers who identify as Black or African American make up 19% of RTD transit service customers, significantly higher than the regional average of 5%. Second, customers who identify as white are found on RTD transit services less frequently, at 44% compared to the regional average of nearly 63%. In other words, based on these onboard survey responses, a majority of RTD customers identify as BIPOC.

RTD 2025-2028 Title VI Program

Figure 14. Customer Race/Ethnicity



Boardings by Race/Ethnicity and Income

When racial or ethnic groups other than white are grouped together, BIPOC individuals account for a greater share of boardings (56%, Figure 15). Boardings are also more likely to be made by non-low-income (67%, Figure 16) customers. Comparing this to the 2019-2023 ACS, the customers in this sample are well above the district averages for both BIPOC (38.2%) and low-income (14.1%) populations.

RTD 2025-2028 Title VI Program

Figure 15. Customer Boardings (Race/Ethnicity)

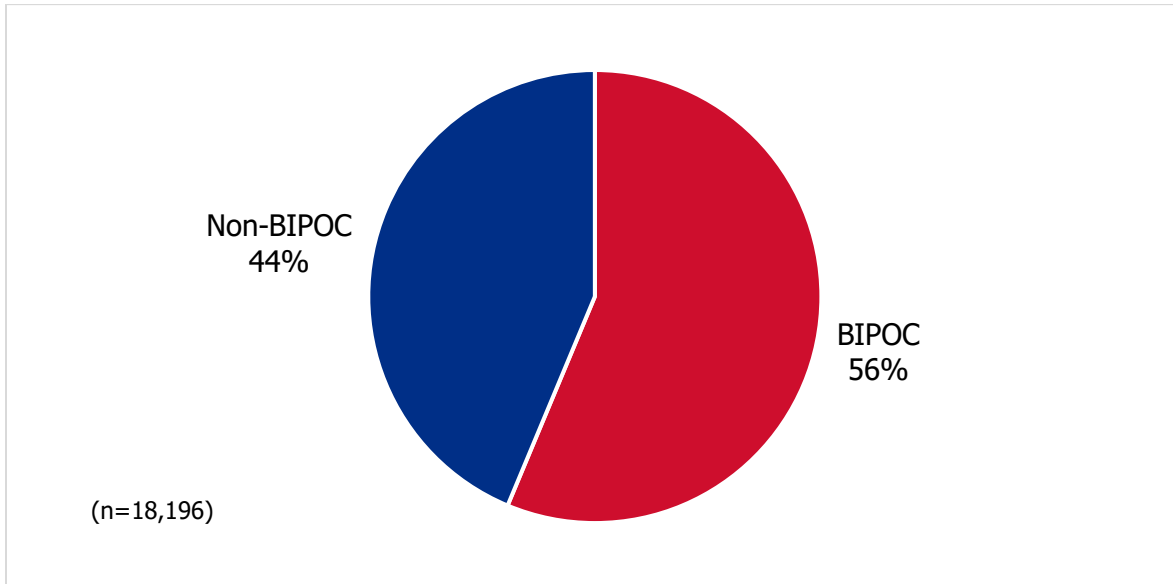
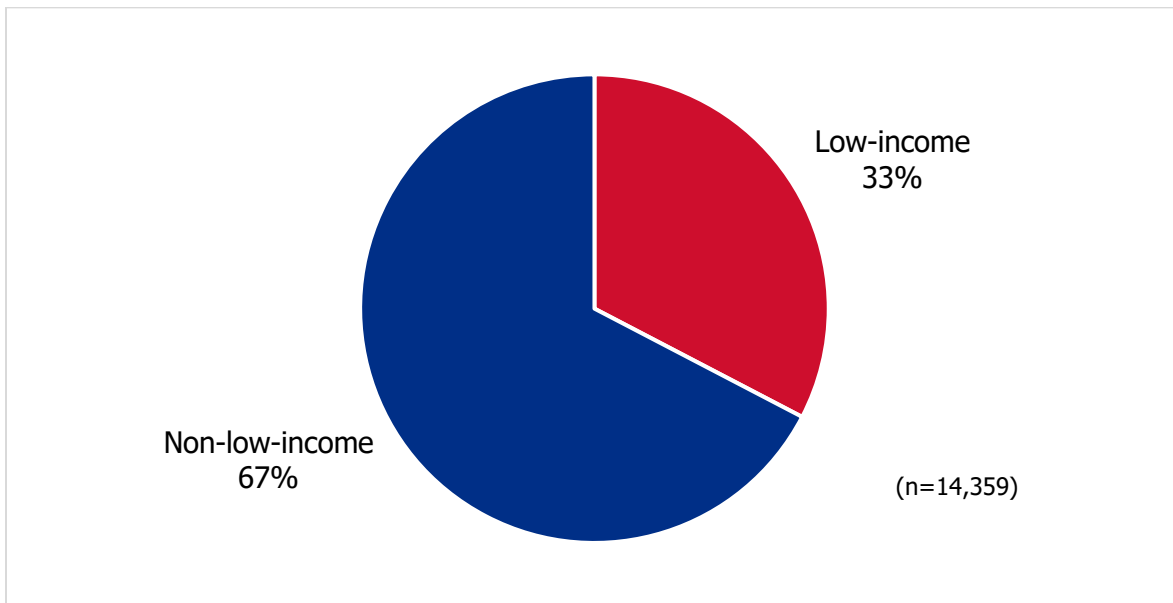


Figure 16. Customer Boardings (Income)



Language Spoken at Home and English Proficiency

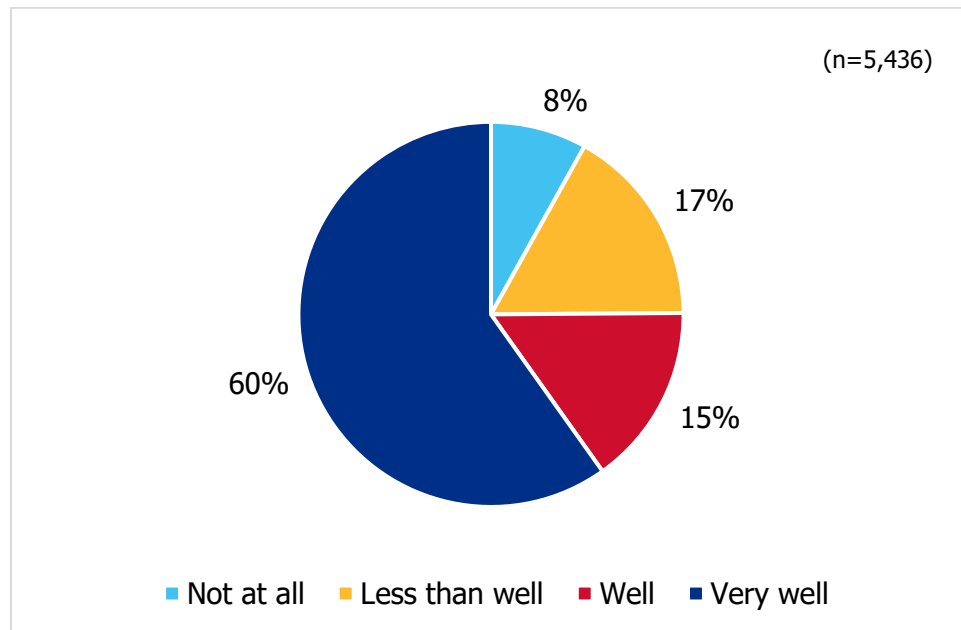
Thirty percent of survey respondents reported speaking a language other than English at home. Among these customers, 40% are considered limited English proficient (LEP).¹⁰ Overall, 12% of all respondents identified as LEP — significantly higher than the regional average of approximately 7%, based on ACS data.

¹⁰ Note that 29% of individuals who reported speaking a language other than English at home still took the survey in English, even if they are technically considered limited English proficient. Those who reported speaking English “not at all” or “less than well” tended to take the survey in a non-English language — which makes sense.

RTD 2025-2028 Title VI Program

Among those who completed the survey in a non-English language, the vast majority were Spanish speakers (98%), followed by Haitian Creole (0.7%) and Cantonese (0.3%). Other languages represented in the survey include Karen, Korean, Mandarin Chinese, French, Russian, and Tagalog.

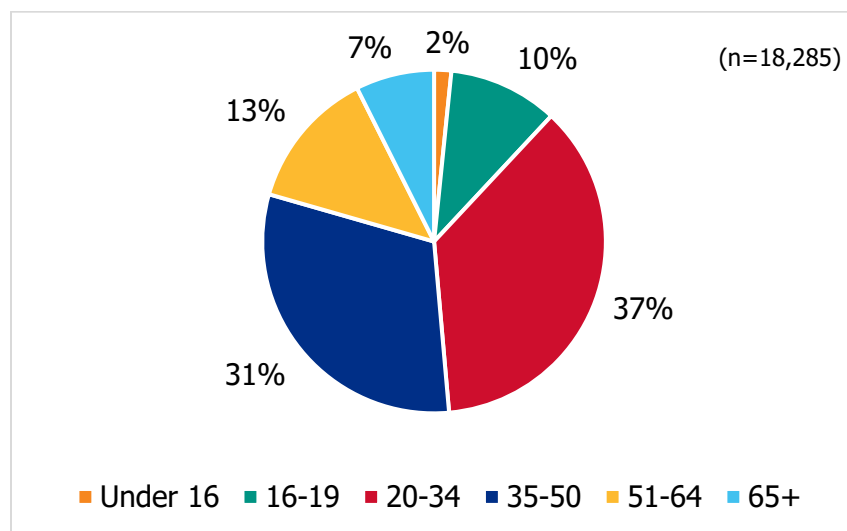
Figure 17. English Ability of Customers Who Speak a Language Other Than English at Home



Age

More than two-thirds of the customers (68%) are between the ages of 20 to 50, illustrated in Figure 18. Twenty percent of the customers are over the age of 50, and 12% are under the age of 20.

Figure 18. Customer Age

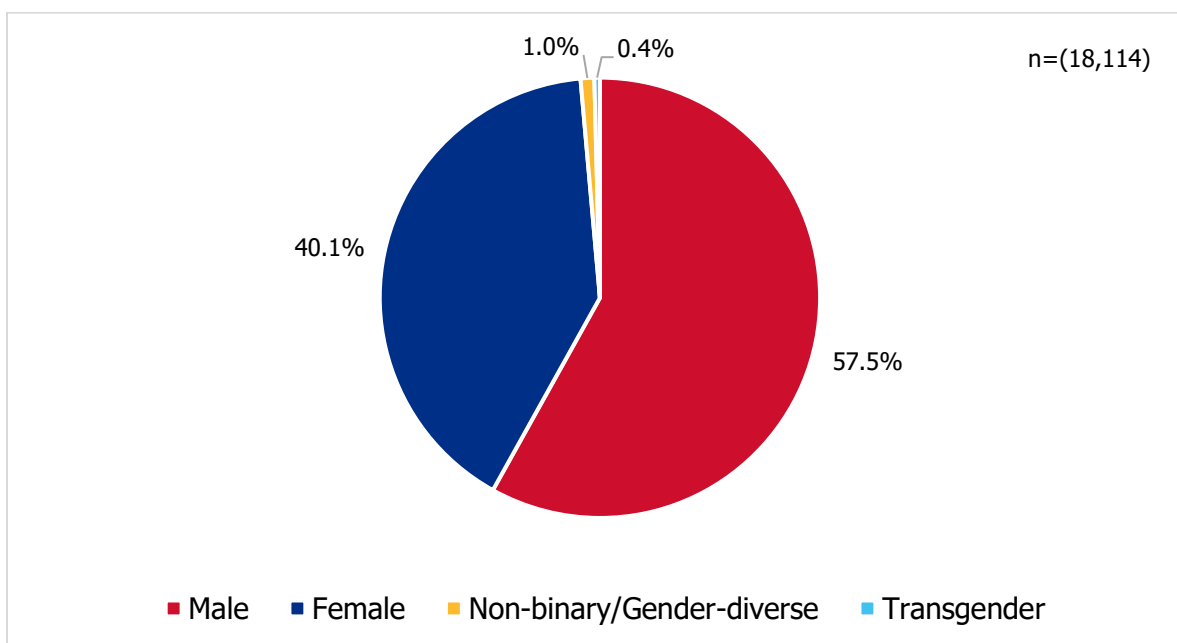


RTD 2025-2028 Title VI Program

Gender Identity

As shown in Figure 19, nearly 58% of customers identify as men, followed by 40% women, 1% non-binary or gender-diverse, and 0.4% transgender.¹¹ This distribution is generally consistent across modes. Among bus customers, 58% identify as men, 41% as women, 0.9% as non-binary or gender-diverse, and 0.5% as transgender. Rail ridership is similar, with 60% identifying as men, 38% as women, 1.2% as non-binary or gender-diverse, and 0.4% of as transgender.

Figure 19. Customer Gender



Travel Behavior

Boardings by Vehicle Modes: Bus versus Rail

Illustrated in Figures 20 and 21, BIPOC customers are found onboard buses at a higher rate (59%) and rail at a lower rate (49%) than their overall boarding percentage (56%). Conversely, non-BIPOC customers are found onboard buses at a lower rate (41%) and rail at a higher rate (51%) than their overall boarding percentage (44%). Low-income customers are found onboard buses at a higher rate (37%) and rail at a lower rate (22%) than their overall boarding percentage (33%). Furthermore, non-low-income customers are found onboard buses at a lower rate (63%) and rail at a higher rate (78%) than their overall boarding percentage (67%).

In other words, BIPOC and low-income customers are overrepresented on buses and underrepresented on rail relative to their overall share of boardings, indicating that these groups are more likely to be found riding the bus than rail.

¹¹ Respondents had the option to select multiple categories — for instance, “Transgender” and “Woman.” However, due to a data analytics error, these respondents were automatically added to an “Other” category which is not captured in this graphic, amounting to approximately 1% of the survey population.

RTD 2025-2028 Title VI Program

Figure 20. Percent of Customer Boardings by Vehicle Mode (Race/Ethnicity)

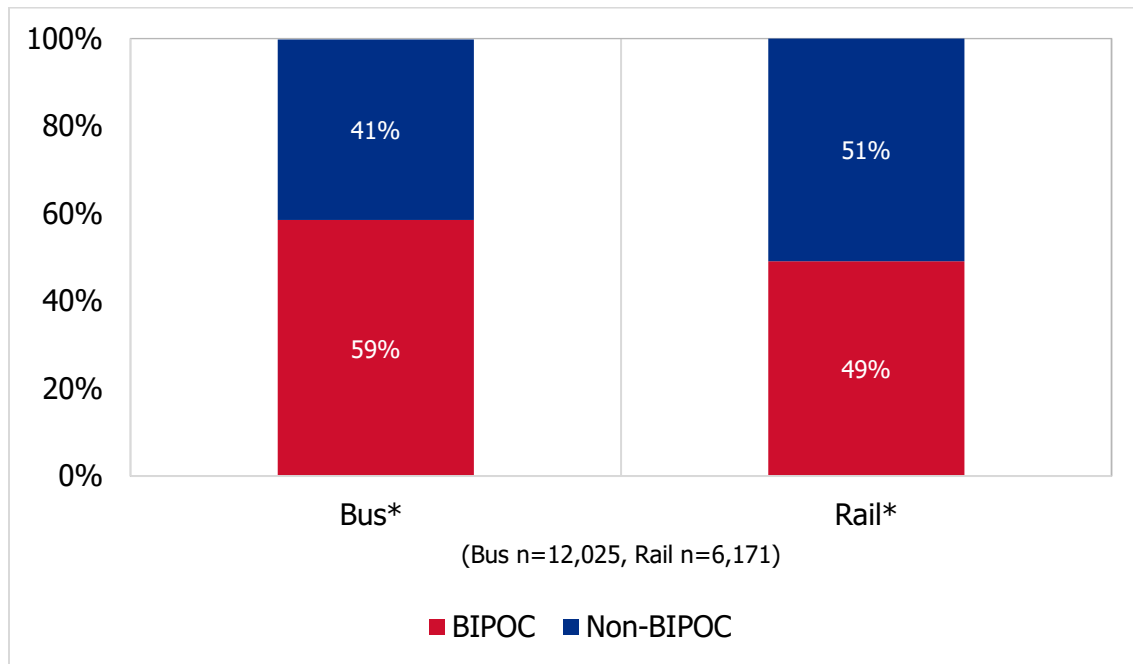
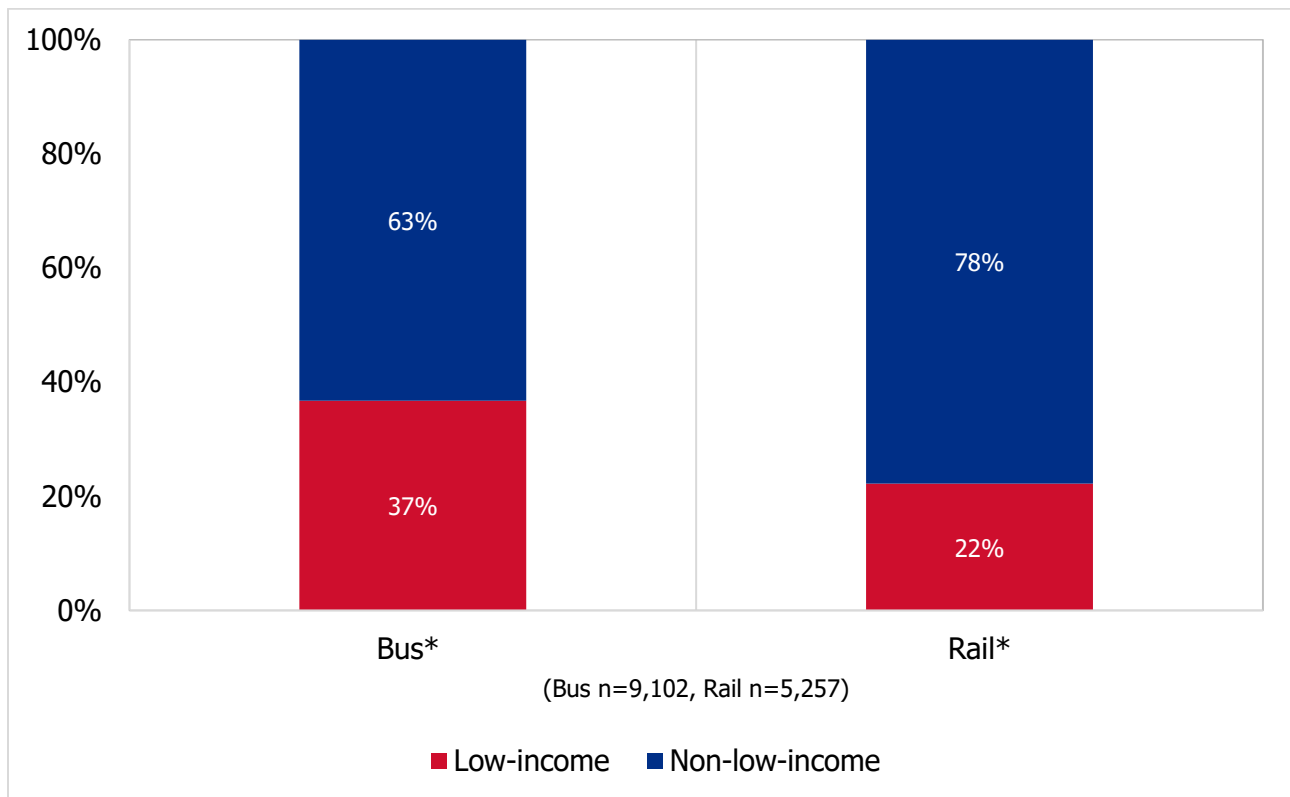


Figure 21. Percent of Customer Boardings by Vehicle Mode (Income)

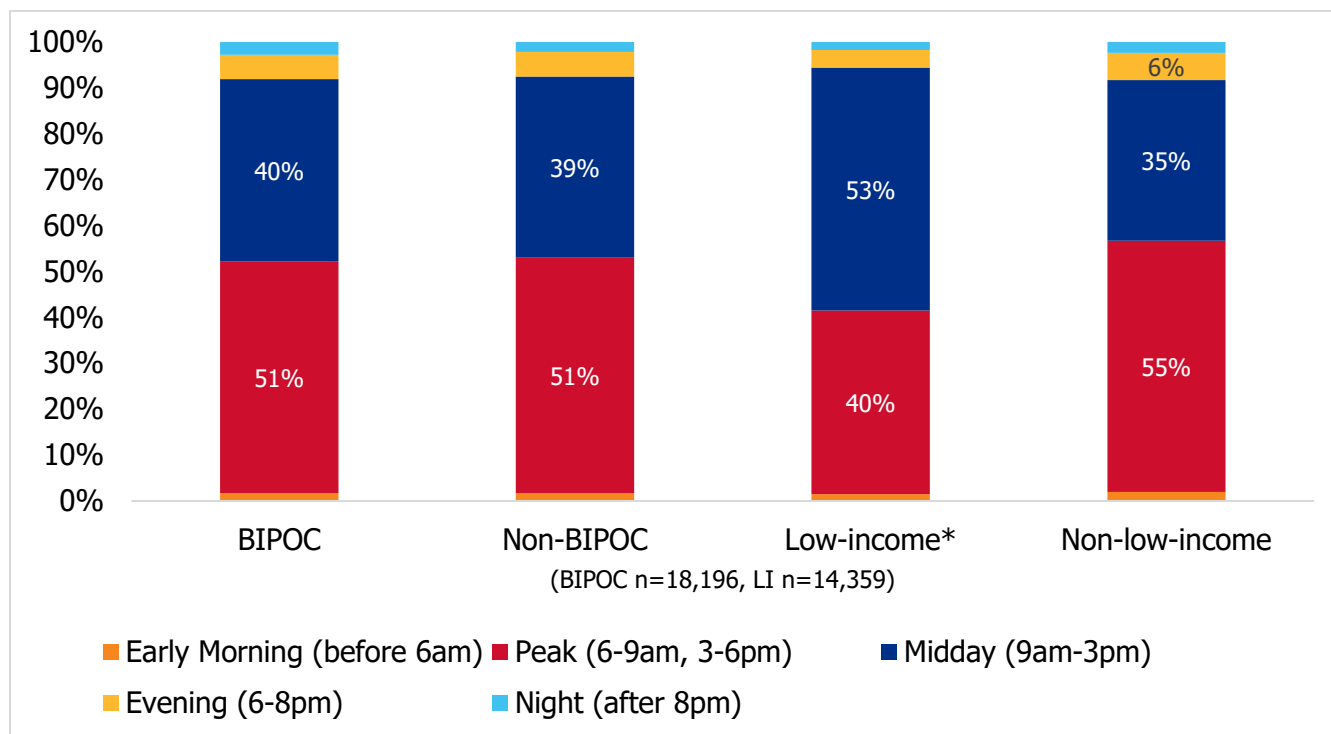


RTD 2025-2028 Title VI Program

Ridership by Time of Day

A comparison of boardings by time of day revealed that low-income customers are more likely to ride during midday hours (9 am-3 pm), with 53% of their trips occurring during this period — as illustrated in Figure 22. In contrast, non-low-income customers are more likely to board during peak hours (6-9 am and 3-6 pm), with 55% of their trips occurring during those times. Time-of-day patterns were similar between BIPOC and non-BIPOC customers, with no notable differences observed.

Figure 22. Customer Ridership by Time of Day (Race/Ethnicity and Income)¹²



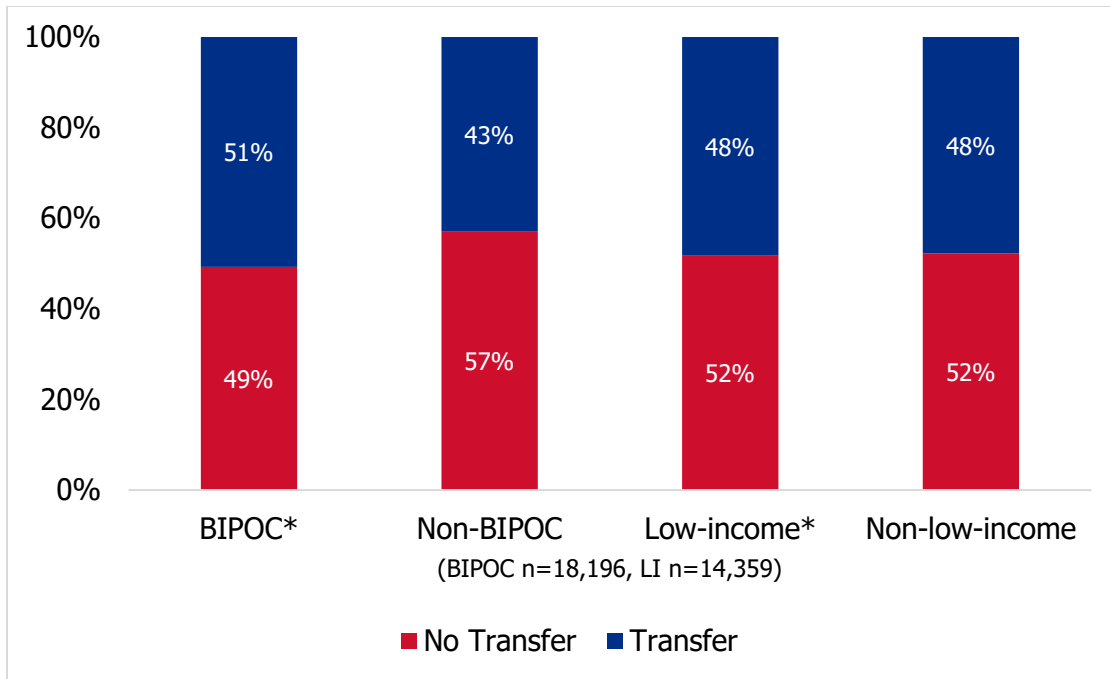
¹² Stacked charts with results equal to or less than 5% will not have an accompanying data label due to space constraints.

RTD 2025-2028 Title VI Program

Transfers

Just over half of the customers recorded in the onboard survey did not require a transfer (53%) to complete their one-way trips (Figure 23). However, 51% of trips taken by BIPOC customers included a transfer, a higher proportion than the 43% of non-BIPOC customers. Trips made by low-income customers were equally likely to include a transfer as non-low-income customers.

Figure 23. Customer Transfers (Race/Ethnicity and Income)

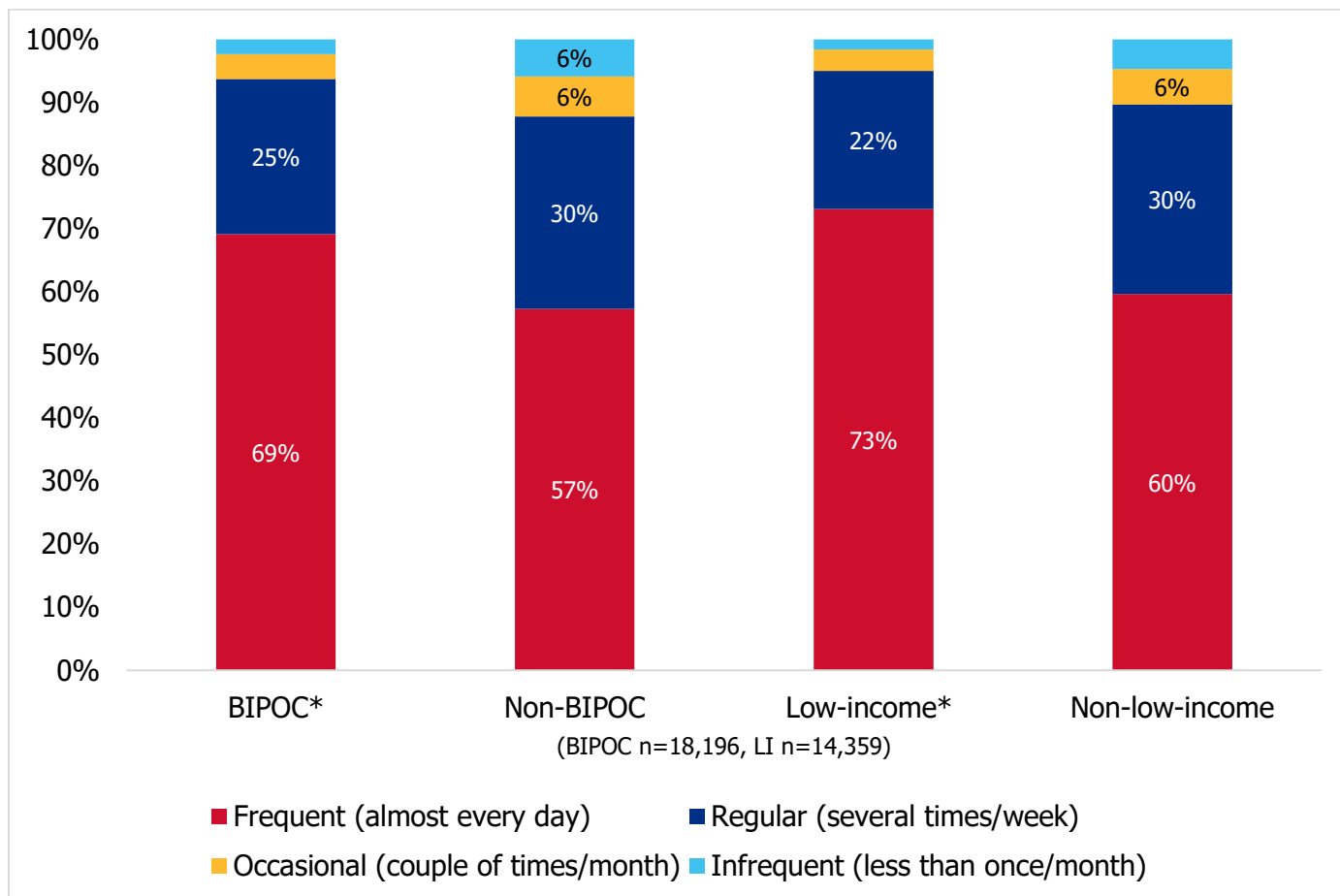


RTD 2025-2028 Title VI Program

Frequency of Riding

The majority of respondents report high usage of RTD transit services, with 95% identifying themselves as frequent/regular customers. BIPOC customers reported high frequent ridership (69%) compared to non-BIPOC customers (57%). Low-income customers are the most frequent users, with 73% reporting almost daily usage compared to 60% of non-low-income customers.

Figure 24. Customer Ridership Frequency (Race/Ethnicity and Income)



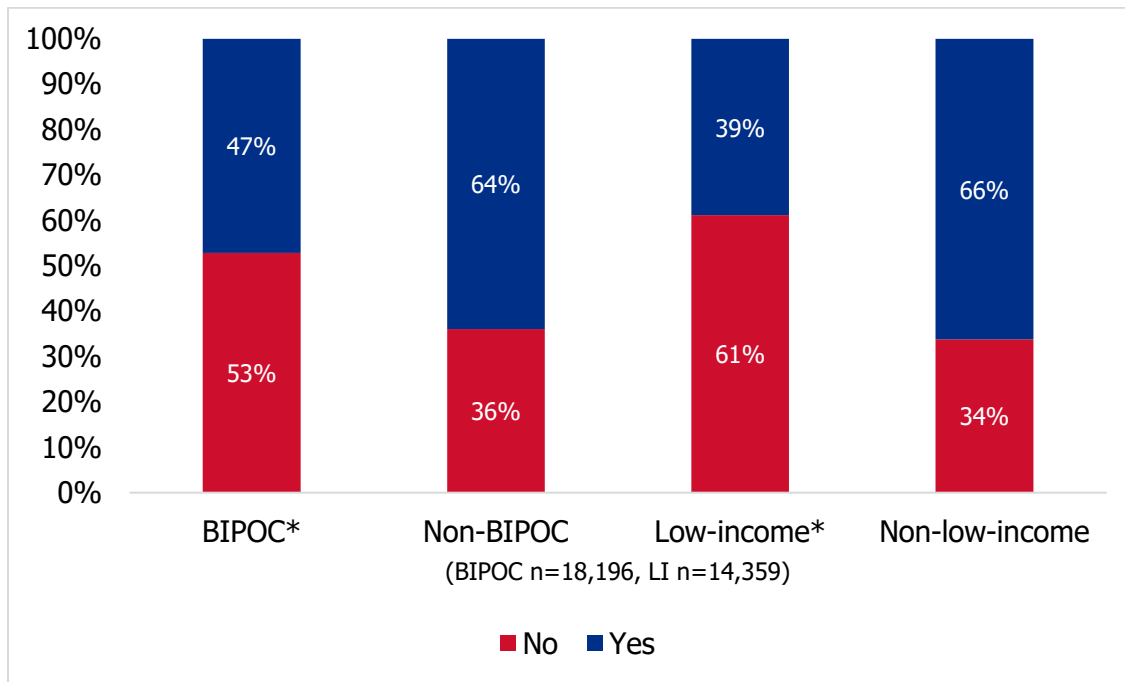
Transit Dependency

Driver's License Access

To assess transportation options available to RTD customers, respondents were asked whether they have a driver's license, a household vehicle, and access to that vehicle. Figure 25 shows that only 47% of BIPOC customers and 39% of low-income customers have a valid driver's license. In contrast, driver's license rates are much higher among non-BIPOC and non-low-income customers, with approximately two-thirds holding a license.

RTD 2025-2028 Title VI Program

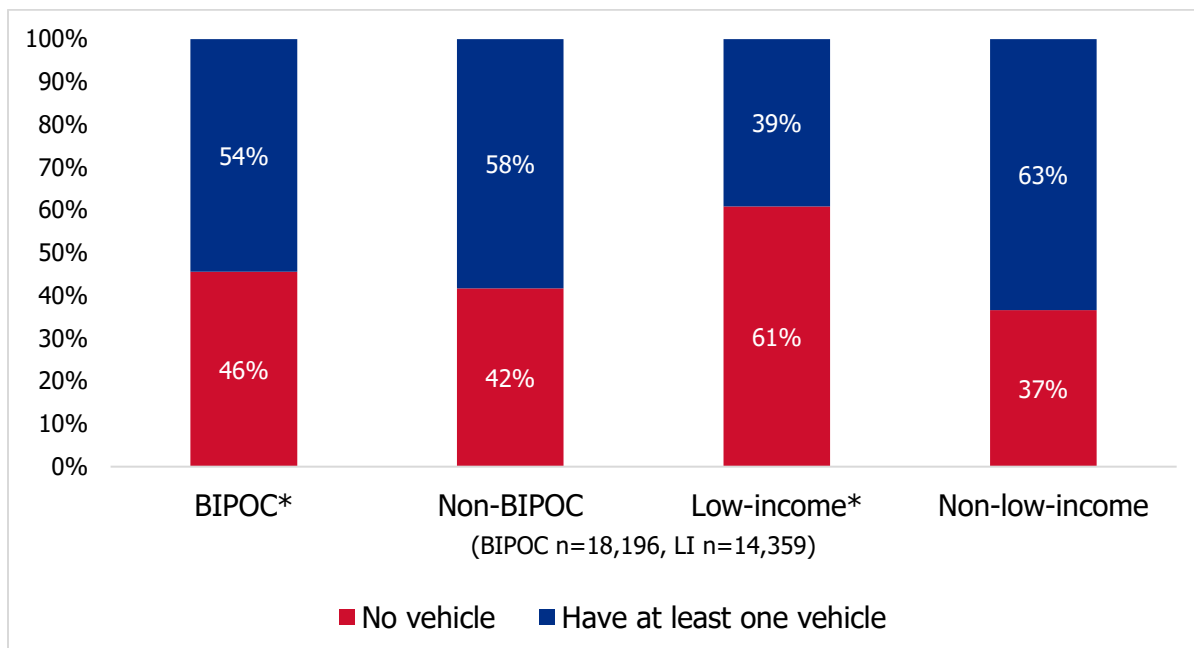
Figure 25. Customer Access to Driver's License (Race/Ethnicity and Income)



Vehicle Ownership at Household Level

Respondents were asked about the number of vehicles available to their household. Fifty-seven percent reported access to a vehicle, as shown in Figure 26. Low-income customers have the least amount of access to household vehicles, with 61% reporting no vehicle compared to 37% of non-low-income customers. Approximately 54% of BIPOC customers and 58% of non-BIPOC customers reported at least one vehicle in their household.

Figure 26. Customer Access to Household Vehicles

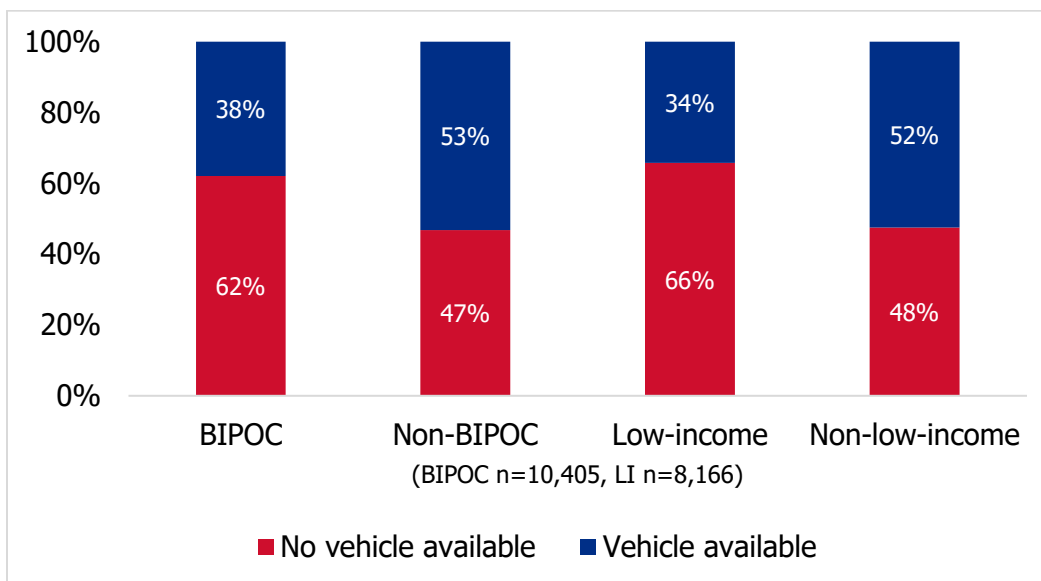


RTD 2025-2028 Title VI Program

Ability to Use Vehicle for Trip

Further, customers with at least one vehicle in their household were asked if they could have used a vehicle for the trip they were making at the time of the survey. Even though BIPOC and low-income customers reported having access to a vehicle, over 62% stated they could not have used the vehicle for the trip they were currently making. Out of the 18,285 people that provided a snapshot of their current trip, only 27% stated they had a vehicle and could have used it for that trip.

Figure 27. Customer Ability to Use a Vehicle on This Trip



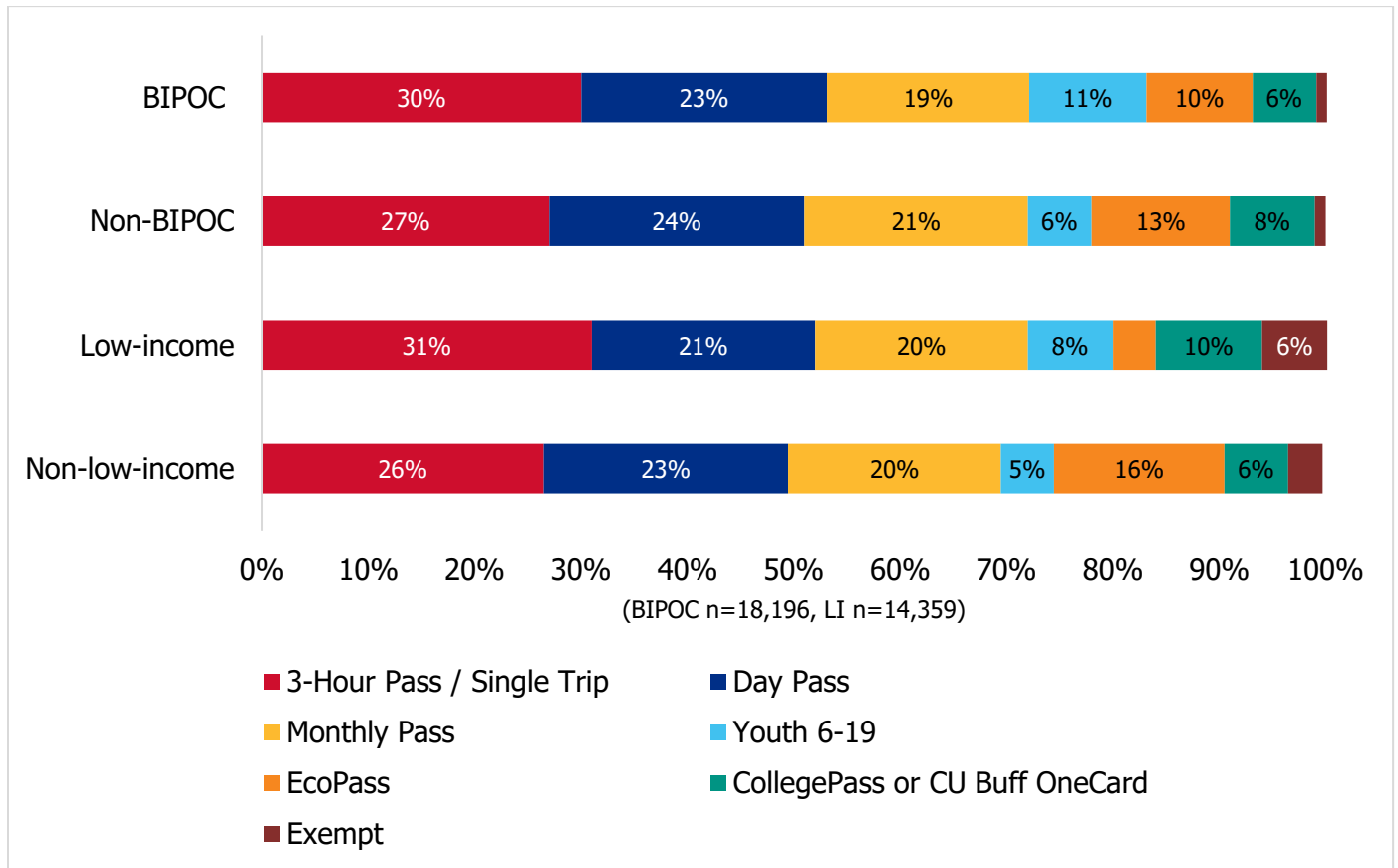
Fare Payment

Fare Product Type

The top three types of ticket/fare products customers use for their trips are the 3-hour pass/single trip, day pass, and monthly pass. As shown in Figure 28, BIPOC and low-income customers show a slight preference for the 3-hour pass/single trip compared to non-BIPOC and non-low-income customers. Overall, ticket/fare product usage is similar across the groups. Exempt tickets include no-cost tickets such as free-ride coupons for the general public active military, law enforcement, fire fighters, and aides for customers with disabilities; RTD employee, spouse, dependent, retiree, board, and contractor passes; and free fixed-route service access for Access-a-Ride customers.

RTD 2025-2028 Title VI Program

Figure 28. Fare Product Type Comparisons (Race/Ethnicity and Income)

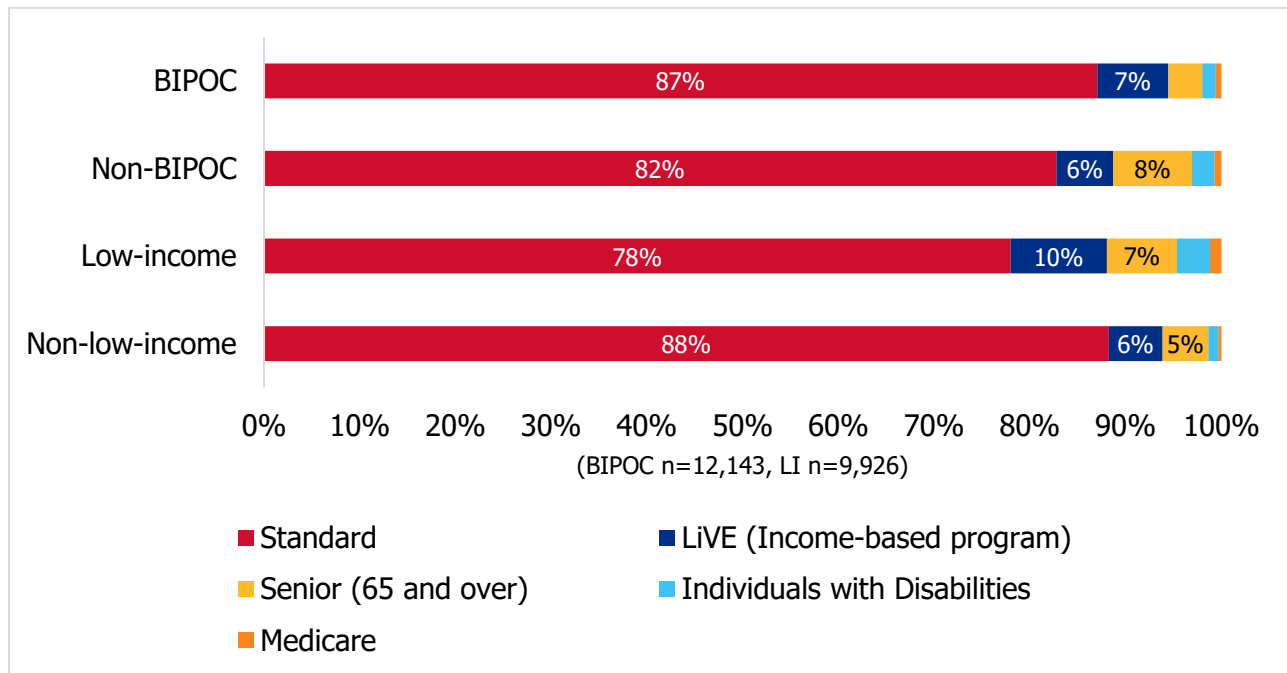


Fare Category

Nearly 86% of customers use the standard fare for their trips. As shown in Figure 29, low-income customers use the highest percentage of LiVE (income-based discounts) at 10%, a higher usage rate than non-low-income customers at 6%. Non-BIPOC customers use the senior (65 and over) fare type at twice the rate of BIPOC customers. Medicare and the Individuals with Disabilities Special Discount reduced fares were used similarly across all groups.

RTD 2025-2028 Title VI Program

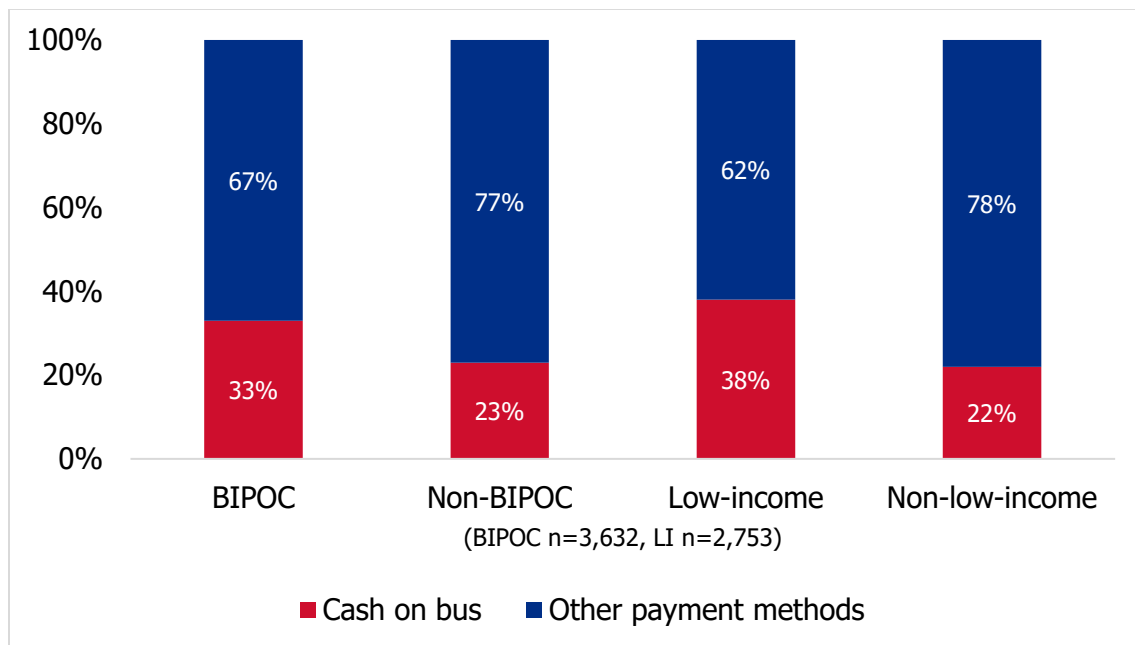
Figure 29. Fare Type for Customer Boarding



Fare Payment Method

Customers were asked about the method of payment they used to purchase their fare (Figure 30). BIPOC and low-income customers used cash on bus (33% and 38%, respectively) at much higher rates in comparison to non-BIPOC and non-low-income customers (23% and 22%, respectively).

Figure 30. Customer Fare Payment Method (Race/Ethnicity and Income)

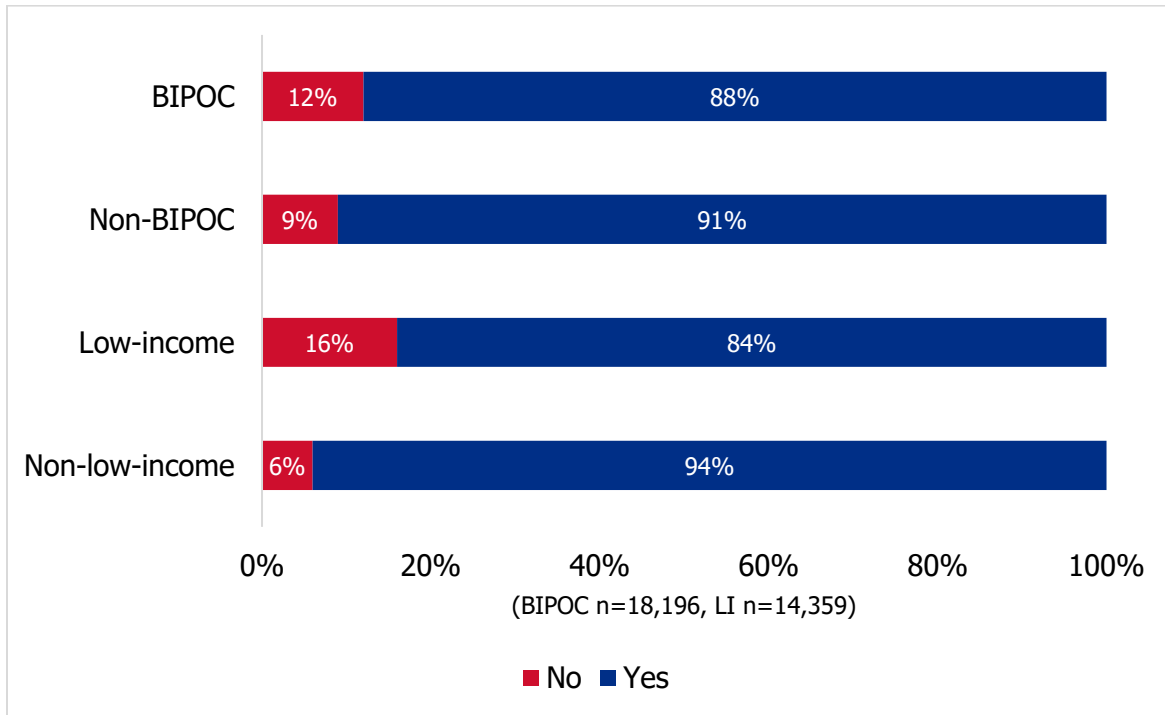


RTD 2025-2028 Title VI Program

Credit or Debit Card Access

When asked about access to a credit or debit card, 90% of all customers report having one, with BIPOC customers reporting slightly lower access at 88%. Illustrated in Figure 31, 16% of low-income customers indicated they do not have a credit or debit card, compared to only 6% of non-low-income customers.

Figure 31. Customer Access to Credit or Debit Card (Race/Ethnicity and Income)



Results: Using 200% Federal Poverty Level for Income

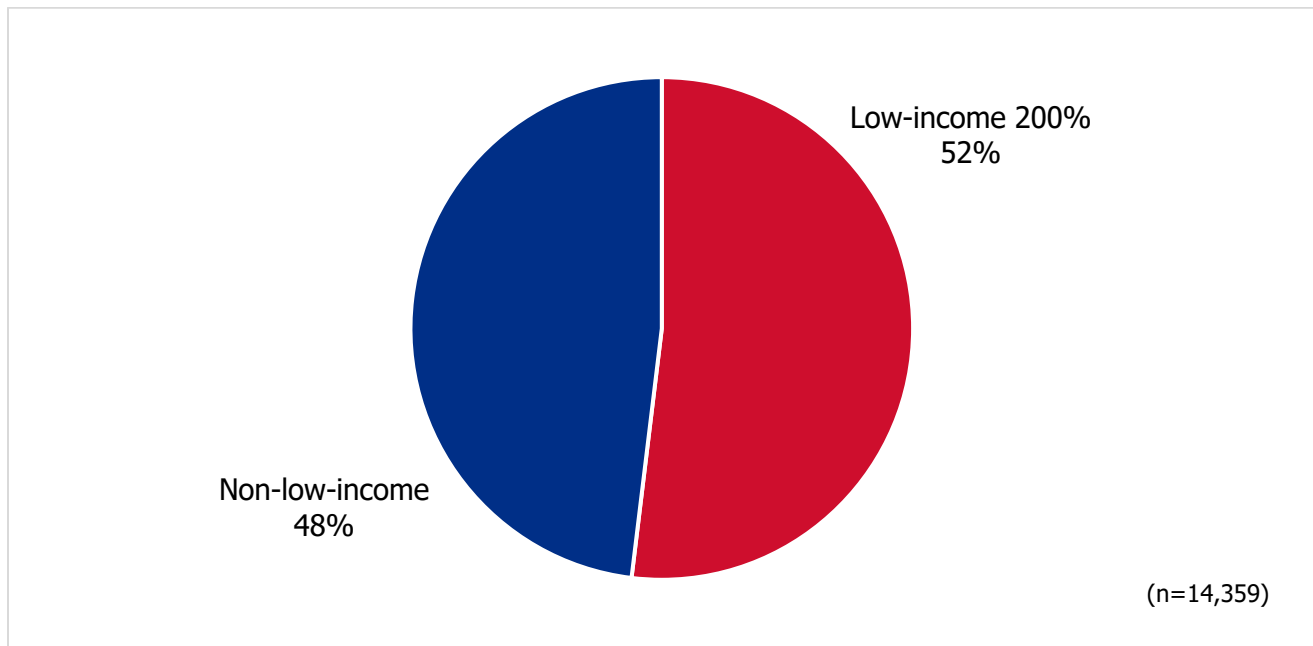
For the purposes of the second portion of the onboard survey results, the Transit Equity Office used the 2025-2028 Title VI Program's updated definition for low income, defined as a person whose median household income is at or below 200% of HHS poverty guidelines. Only results involving income are retabulated in this section.

Boardings by Income

The change from 150% to 200% of the federal poverty level increased the low-income customer population by 19%. Using the 200% threshold, boardings are nearly evenly split between low-income and non-low-income customers, with boardings more likely to be made by low-income customers than non-low-income customers (Figure 32).

RTD 2025-2028 Title VI Program

Figure 32. Customer Boardings (Income)

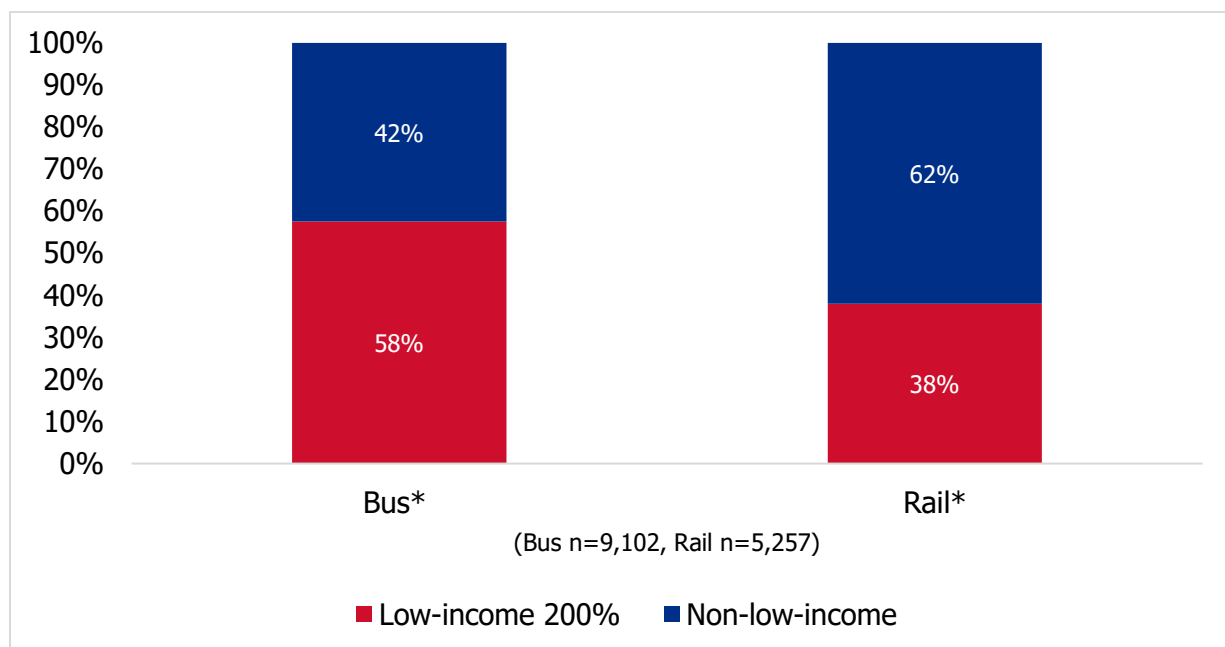


Travel Behavior

Boardings by Vehicle Modes: Bus versus Rail

Illustrated in Figure 33, low-income customers board are found onboard buses at a higher rate (58%) and rail at a lower rate (38%) than their overall boarding percentage (52%). Furthermore, non-low-income customers board are found onboard buses at a lower rate (42%) and rail at a higher rate (62%) than their overall boarding percentage (48%).

Figure 33. Percent of Customer Boardings by Vehicle Mode (Income)

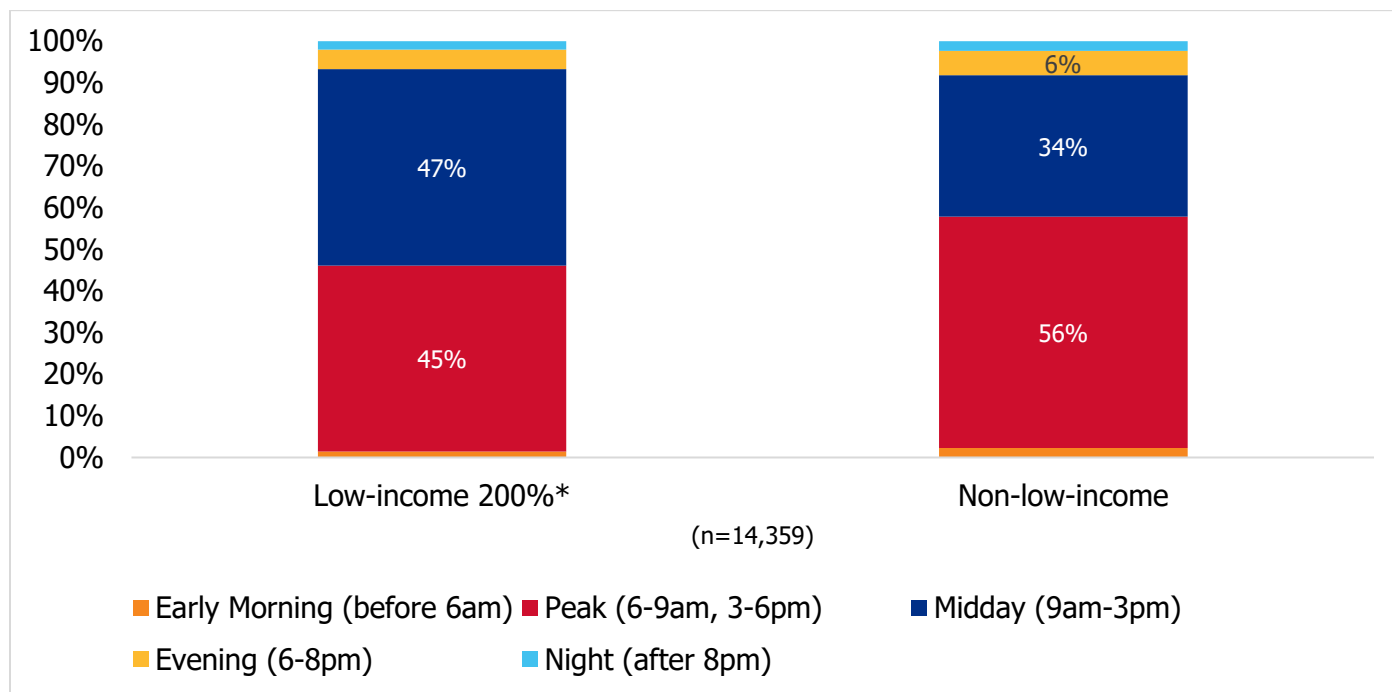


RTD 2025-2028 Title VI Program

Ridership by Time of Day

Low-income customers are more likely to board during midday hours (9 am-3 pm), with 47% of their trips occurring during this period — as illustrated in Figure 34. In contrast, non-low-income customers are more likely to ride during peak hours (6-9 am and 3-6 pm), with 56% of their trips taking place during those periods.

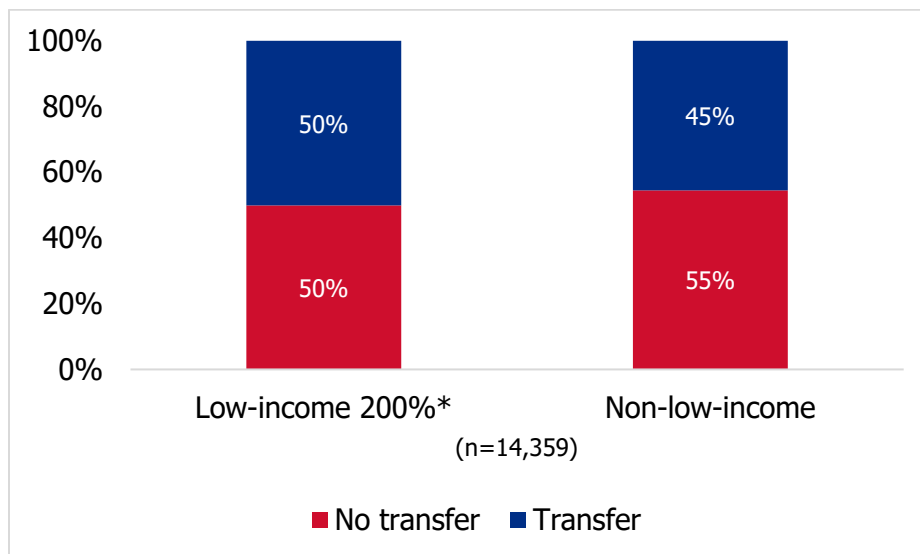
Figure 34. Customer Ridership by Time of Day (Income)



Transfers

Just over half of the customers recorded in the onboard survey did not require a transfer (53%) to complete their one-way trips (Figure 35). Trips made by low-income customers (50%) were more likely to include a transfer than non-low-income customers (45%).

Figure 35. Customer Transfers (Income)

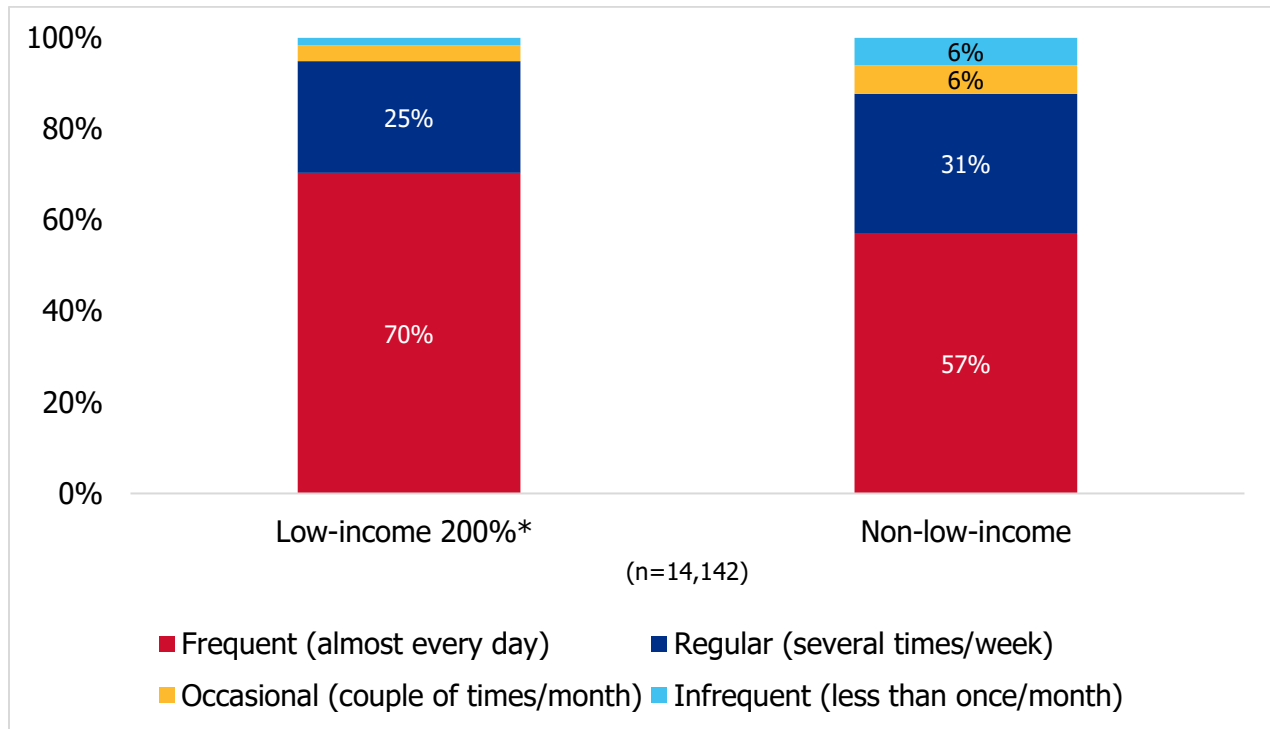


RTD 2025-2028 Title VI Program

Frequency of Riding

The majority of respondents who participated in the onboard survey report high usage of RTD transit services, with 95% identifying themselves as frequent/regular customers. Low-income customers are the most frequent users, with 70% reporting almost daily usage compared to 57% of non-low-income customers (Figure 36).

Figure 36. Ridership Frequency (Income)



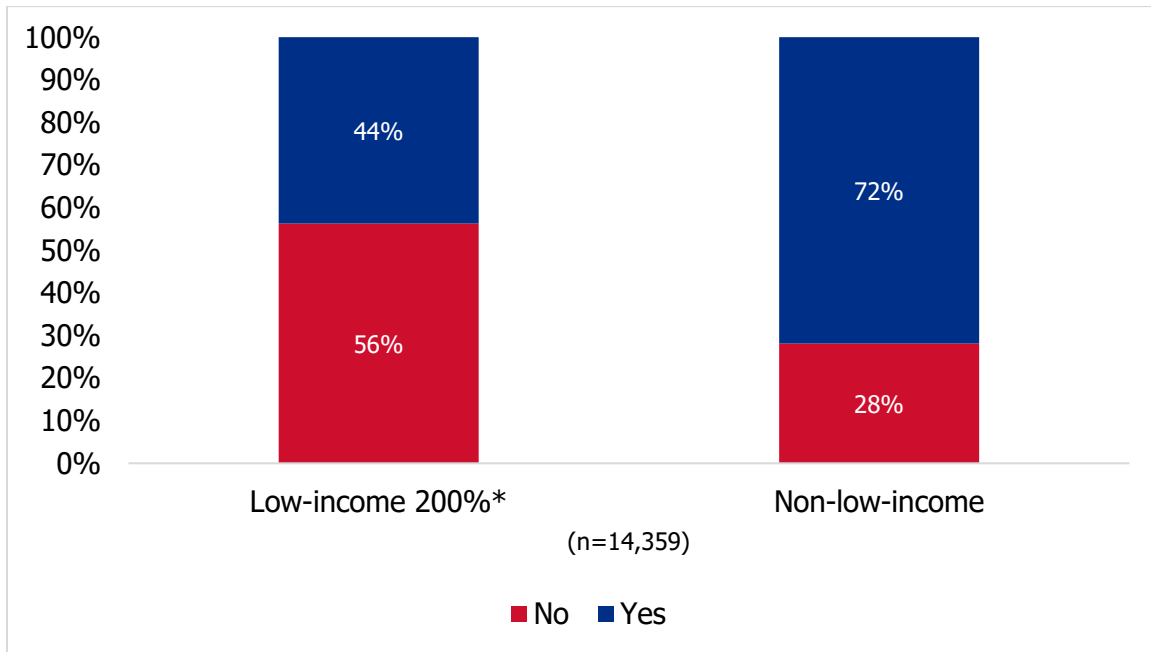
Transit Dependency

Driver's License Access

To assess transportation options available to RTD customers, respondents were asked whether they have a driver's license, a household vehicle, and access to that vehicle. Figure 37 shows that 44% of low-income customers have a valid driver's license. In contrast, driver's license rates are much higher for non-low-income customers, with 72% reporting that they have a license.

RTD 2025-2028 Title VI Program

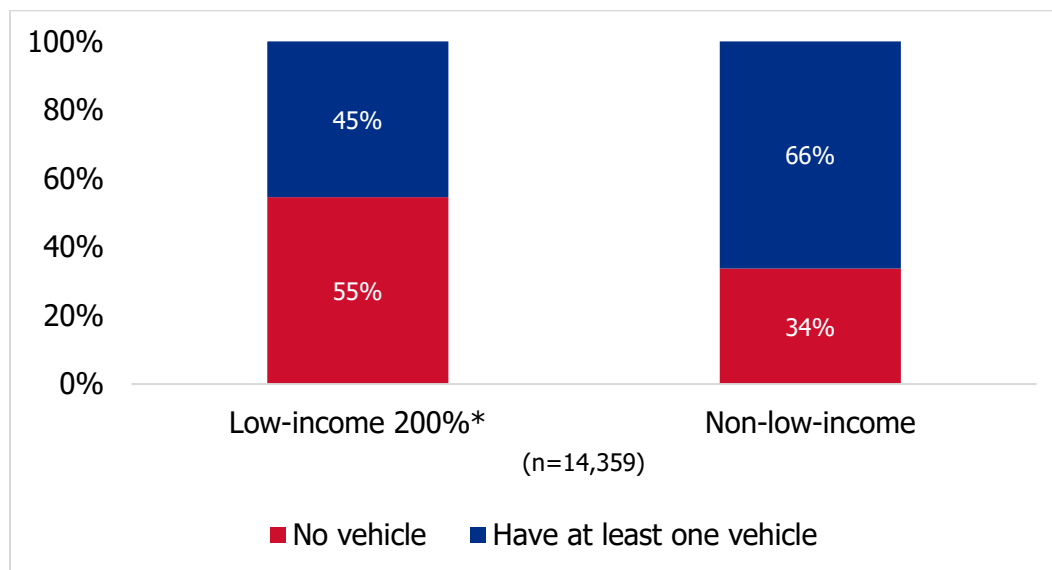
Figure 37. Customer Access to Driver's Licenses (Income)



Vehicle Ownership at Household Level

When asked about vehicle availability, 57% of all respondents reported having access to a household vehicle, as shown in Figure 38. However, access varied by income: only 45% of low-income customers have access to household vehicles compared to 66% of non-low-income customers.

Figure 38. Customer Access to Household Vehicles (Income)

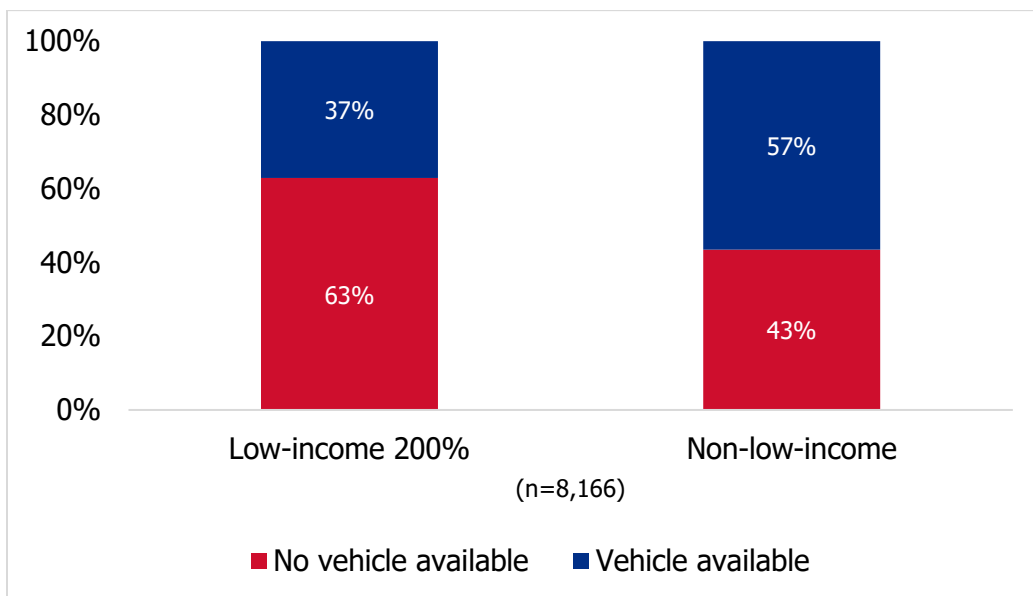


Ability to Use Vehicle for Trip

Further, customers with at least one vehicle in their household were asked if they could have used a vehicle for the trip they were making at the time of the survey. Even though 45% of low-income customers reported having access to a vehicle, 63% stated they could not have used the vehicle for the trip they were currently making.

RTD 2025-2028 Title VI Program

Figure 39. Customer Ability to Use a Vehicle on This Trip (Income)

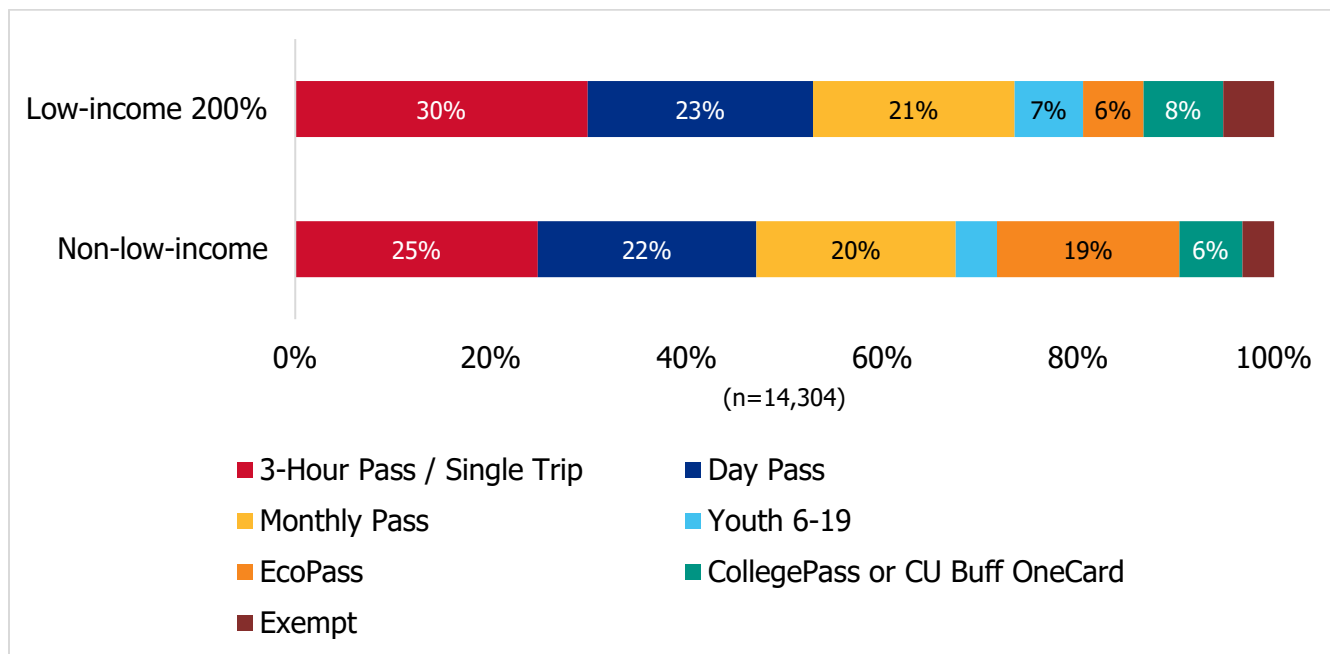


Fare Payment

Fare Product Type

The top three types of ticket/fare products used for customers' one-way trip are the 3-hour pass/single trip, day pass, and monthly pass. As shown in Figure 40, low-income customers show a slight preference for the 3-hour pass/single trip compared to non-low-income customers. Overall, ticket/fare product usage is similar across the groups. Exempt tickets included no-cost tickets such as free-ride coupons for the general public active military, law enforcement, fire fighters, and aide for customers with disabilities; RTD employee, spouse, dependent, retiree, board, and contractor passes; and free fixed-route service access for Access-a-Ride customers.

Figure 40. Fare Product Type Comparisons (Income)

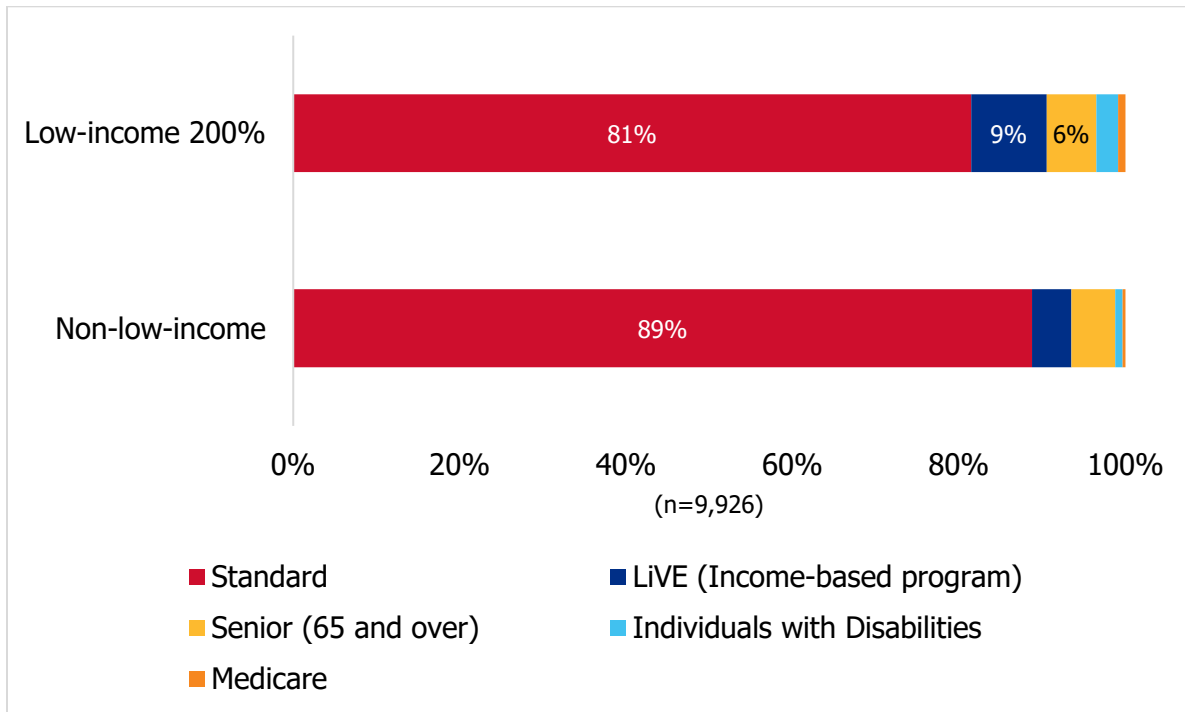


RTD 2025-2028 Title VI Program

Fare Category

Fare payment patterns vary by income level. Non-low-income customers are more likely to pay the standard fare (89%) compared to low-income customers (81%). Low-income customers make greater use of the LiVE income-based discount program, with 9% using it versus 5% of non-low-income customers. Although the Disabilities discount was used infrequently overall (1.2%), it was slightly more common among low-income customers (3%) than non-low-income customers (1%).

Figure 41. Fare Type for Customer Boarding (Income)

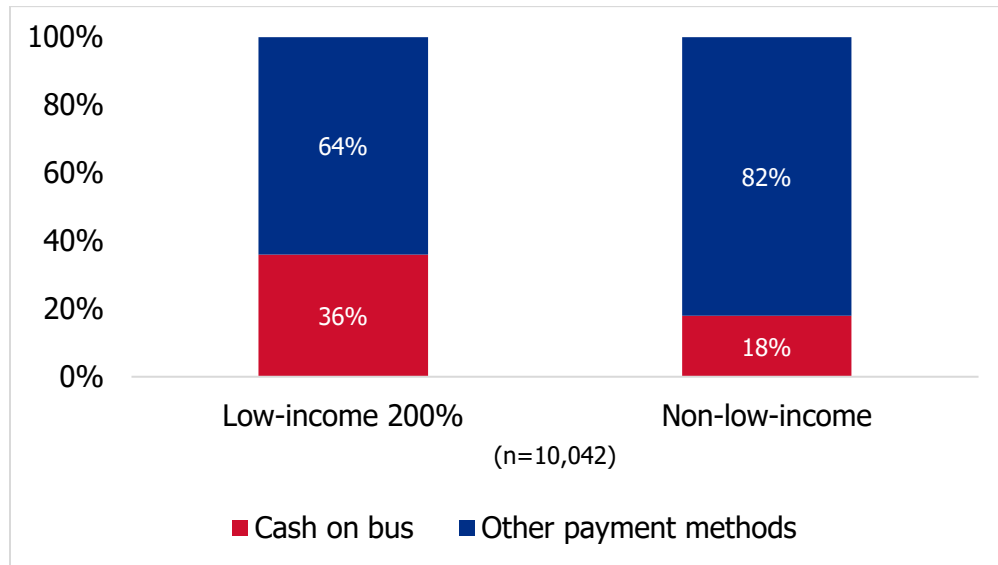


Fare Payment Method

Customers were asked about the payment method they used to purchase their fare. Low-income customers used cash on the bus at double the rate of non-low-income customers (36% and 18%, respectively).

RTD 2025-2028 Title VI Program

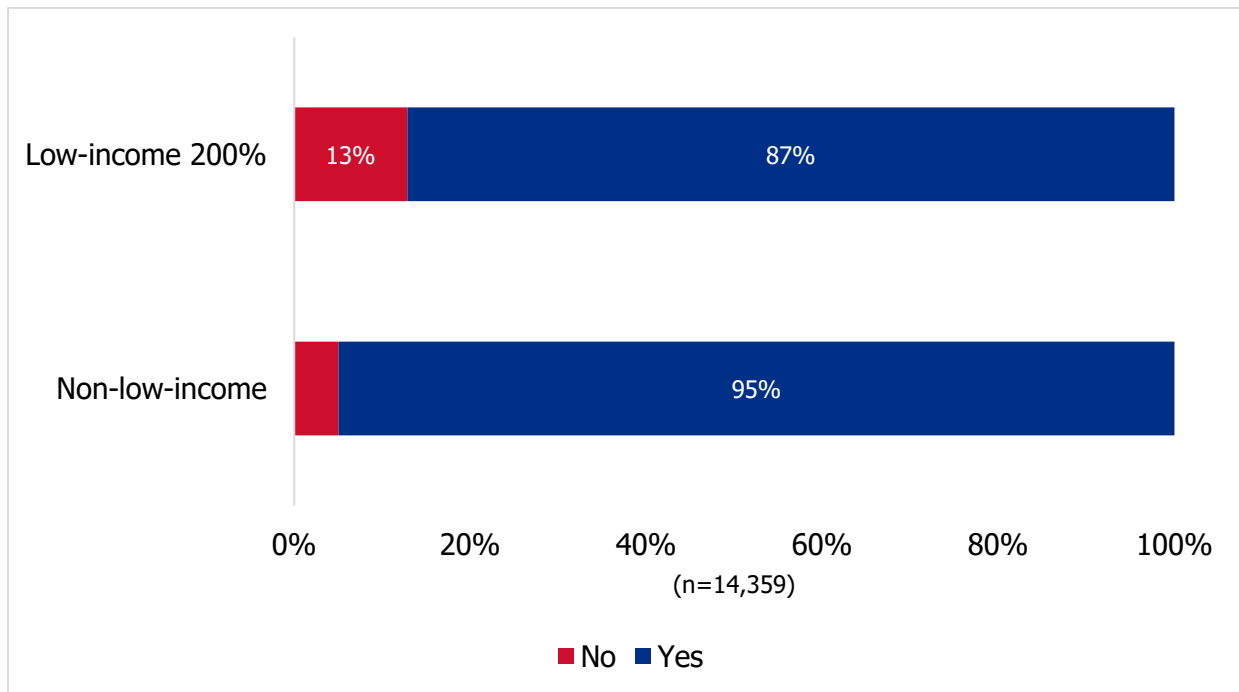
Figure 42. Customer Fare Payment Method



Credit or Debit Card Access

When asked about access to a credit or debit card, 90% reported having one. As shown in Figure 43, 13% of low-income customers do not have a credit or debit card compared to only 5% of non-low-income customers.

Figure 43. Customer Access to Credit or Debit Card (Income)



RTD 2025-2028 Title VI Program

Facilities and Demographics Assessment

Twelve maps (Figures 44-55) 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

Figure 44 provides an overview of all RTD facilities within the service area. Figure 45 maps these facilities in relation to census block groups where BIPOC populations exceed the district average (38.2%), while Figure 46 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.

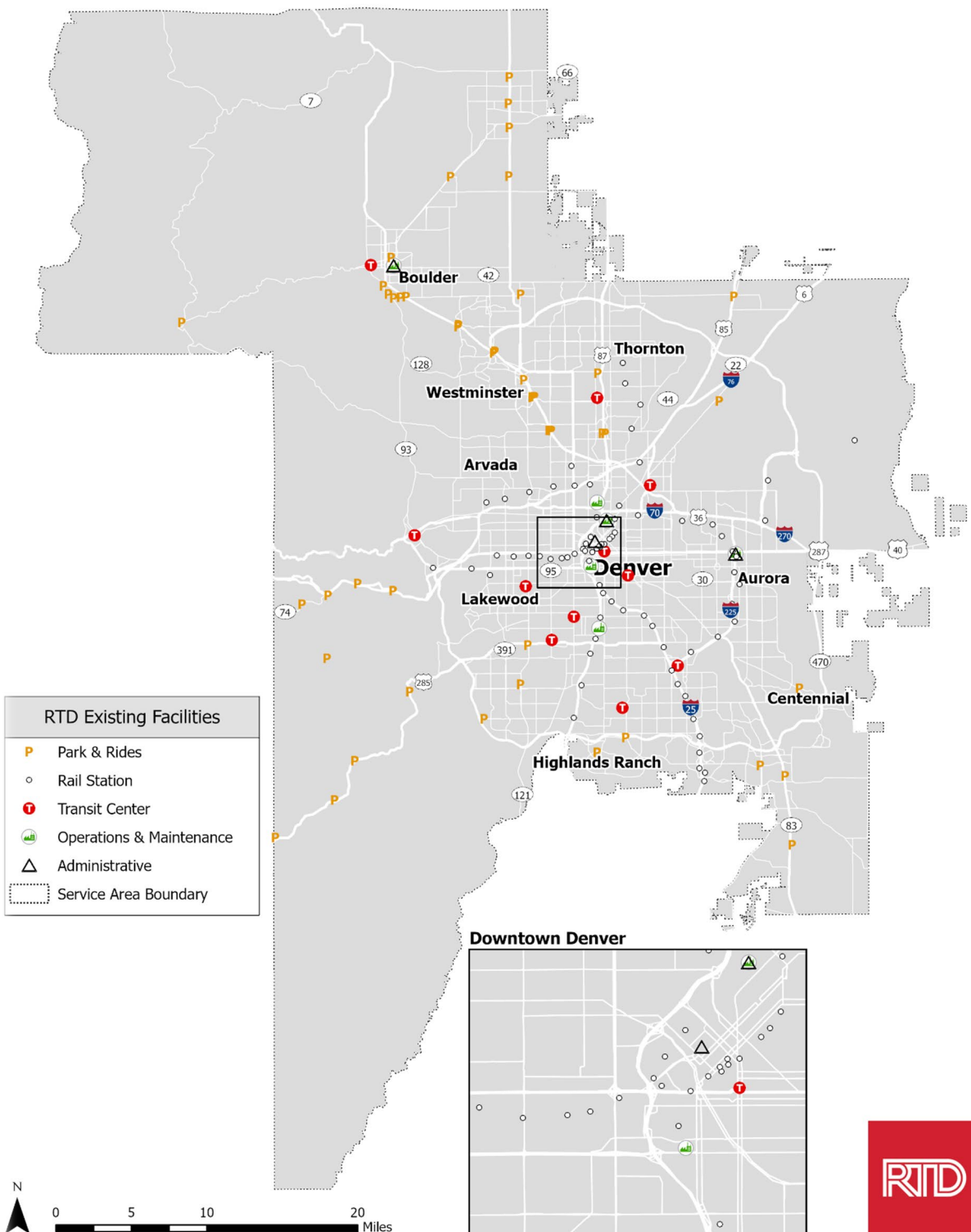
The following figures break down facility improvement maps, using the same district averages for BIPOC (38.2%) and low-income (14.1%) populations:

- Figures 47-49: Recent improvements – base map (Figure 47) with BIPOC (Figure 48) and low-income (Figure 49) populations
- Figures 50-52: Ongoing improvements – Base map (Figure 50) with BIPOC (Figure 51) and low-income (Figure 52) populations
- Figures 53-55: Planned improvements (next five years) – Base map (Figure 53) with BIPOC (Figure 54) and low-income (Figure 55) populations

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

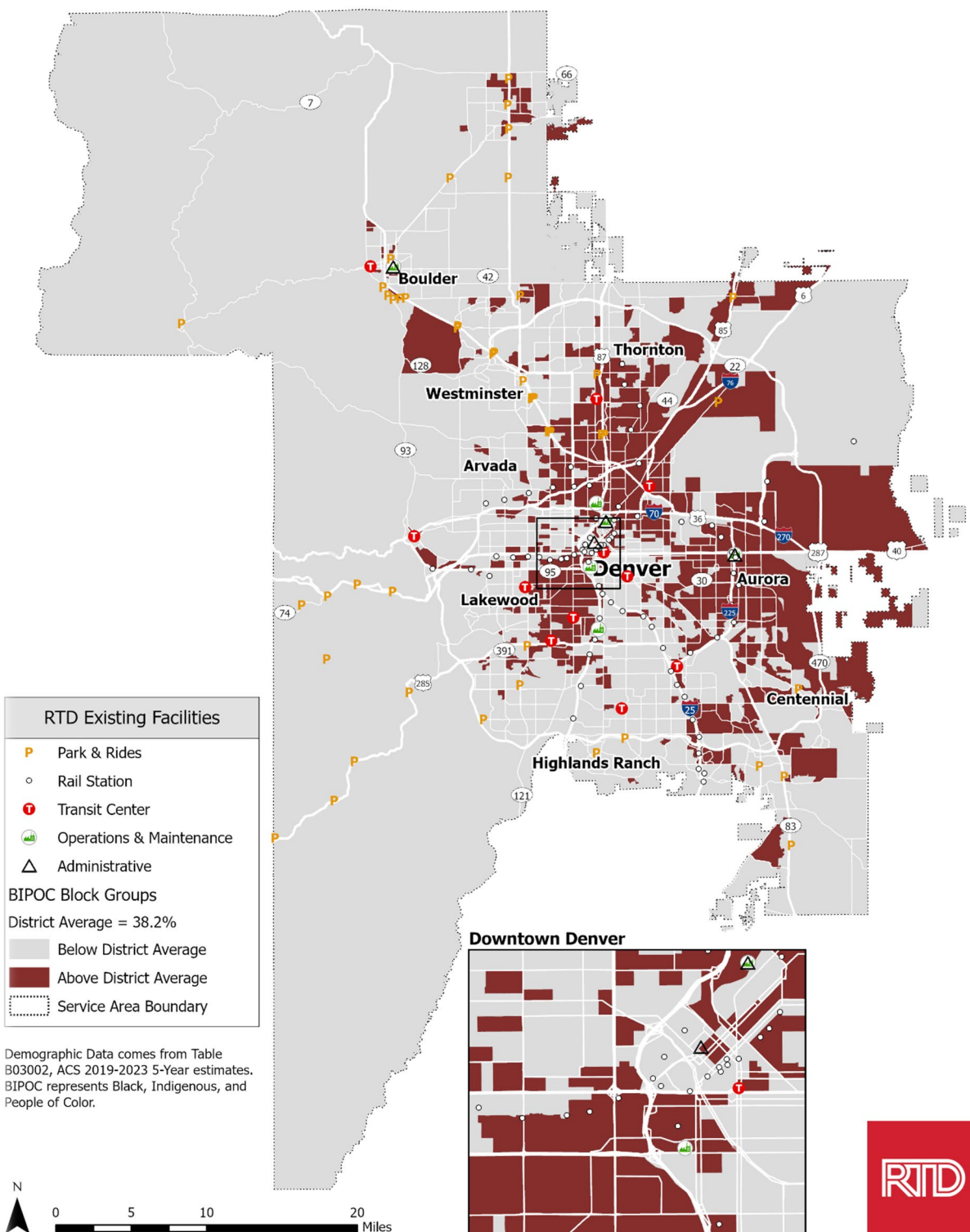
RTD 2025-2028 Title VI Program

Figure 44. Existing RTD Facilities



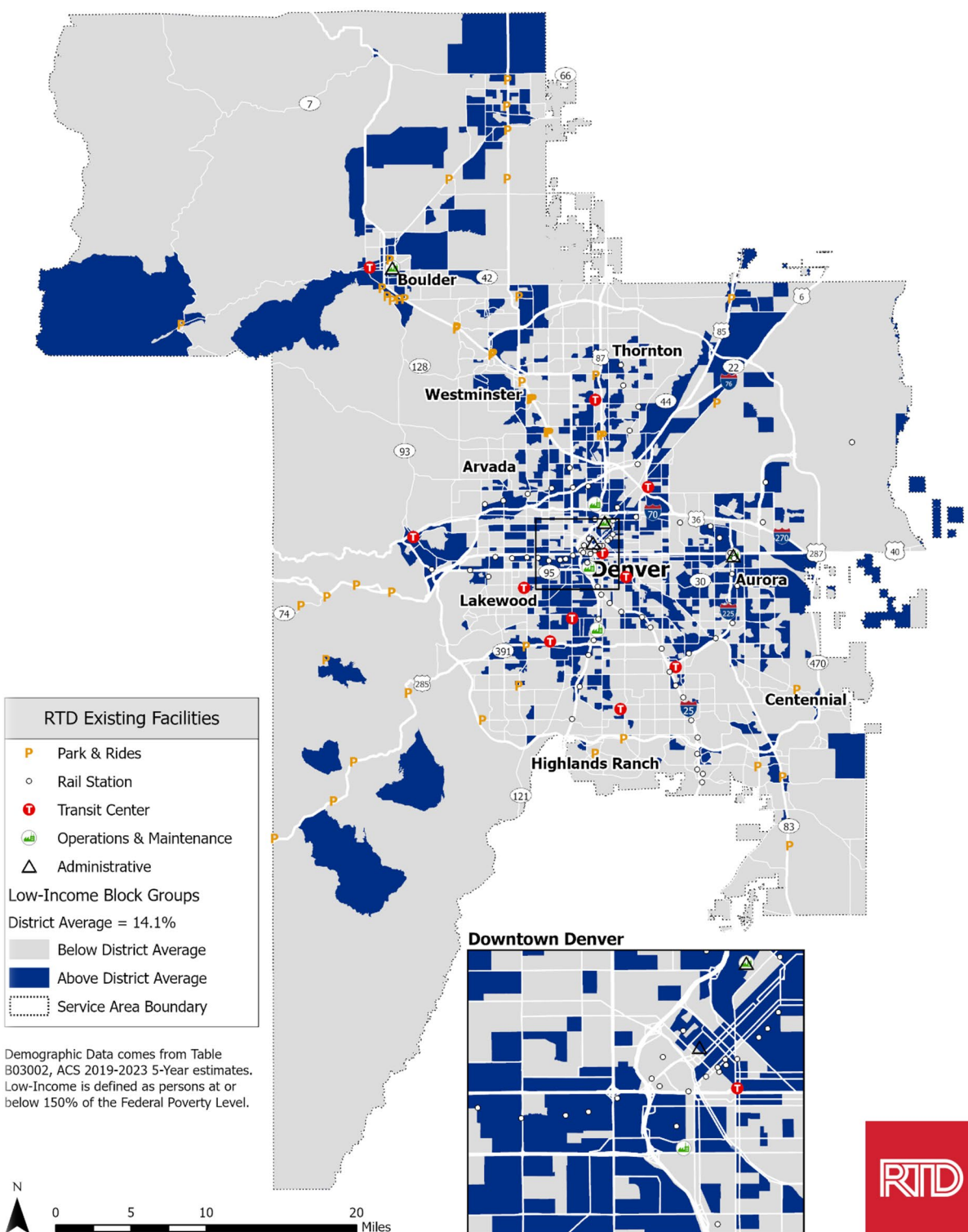
RTD 2025-2028 Title VI Program

Figure 45. Existing RTD Facilities with BIPOC Population



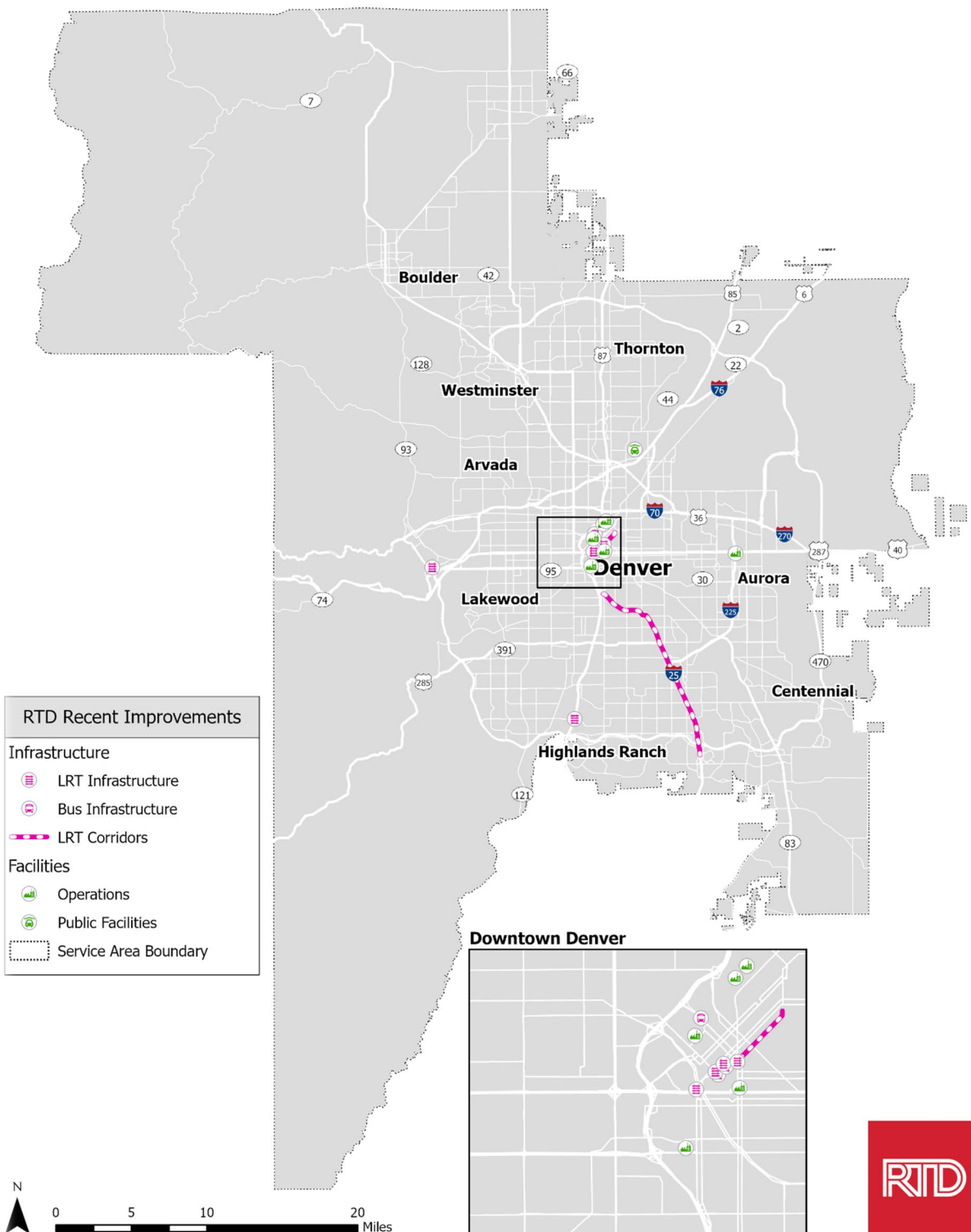
RTD 2025-2028 Title VI Program

Figure 46. Existing RTD Facilities with Low Income Population



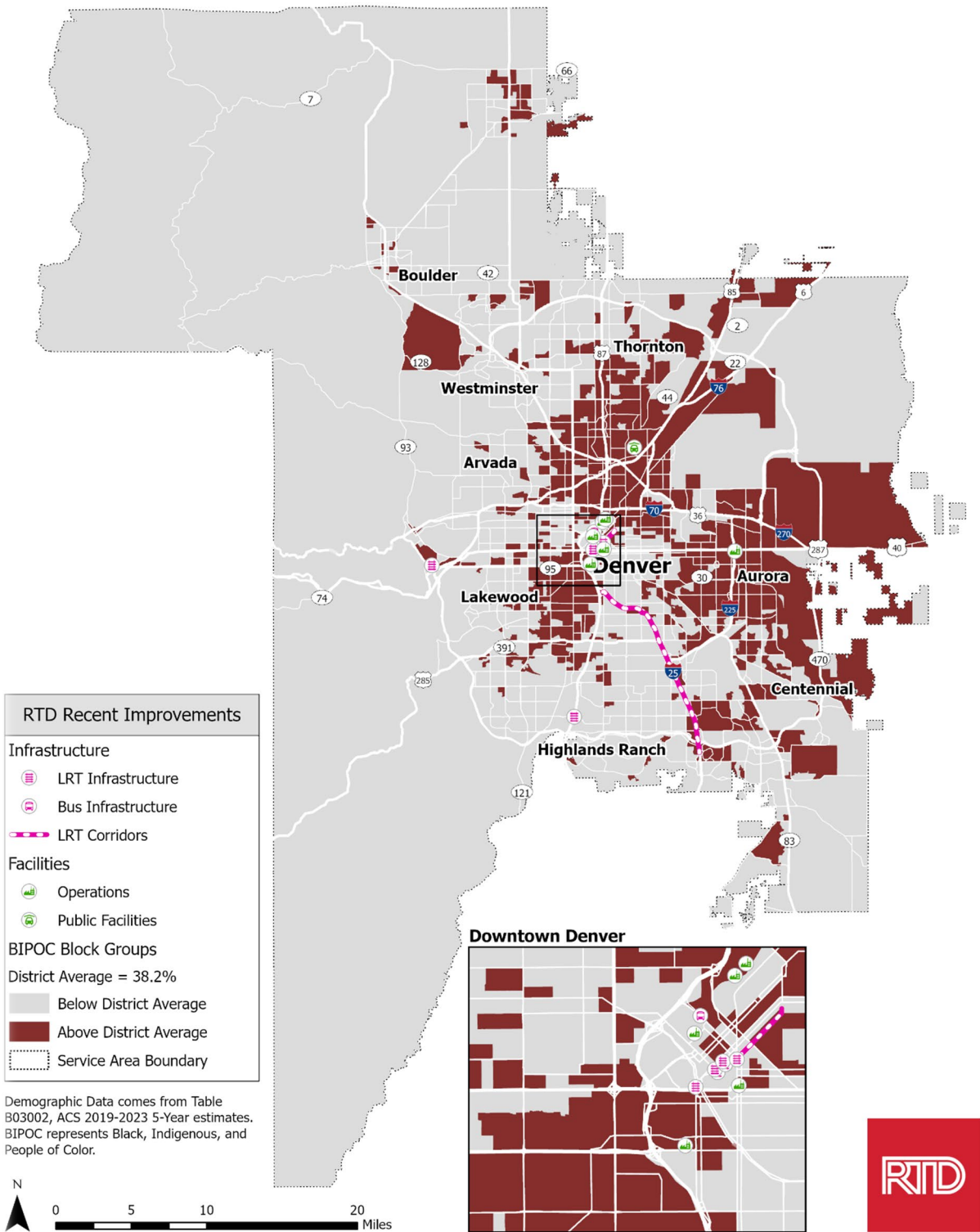
RTD 2025-2028 Title VI Program

Figure 47. Recent Improvements by Facility



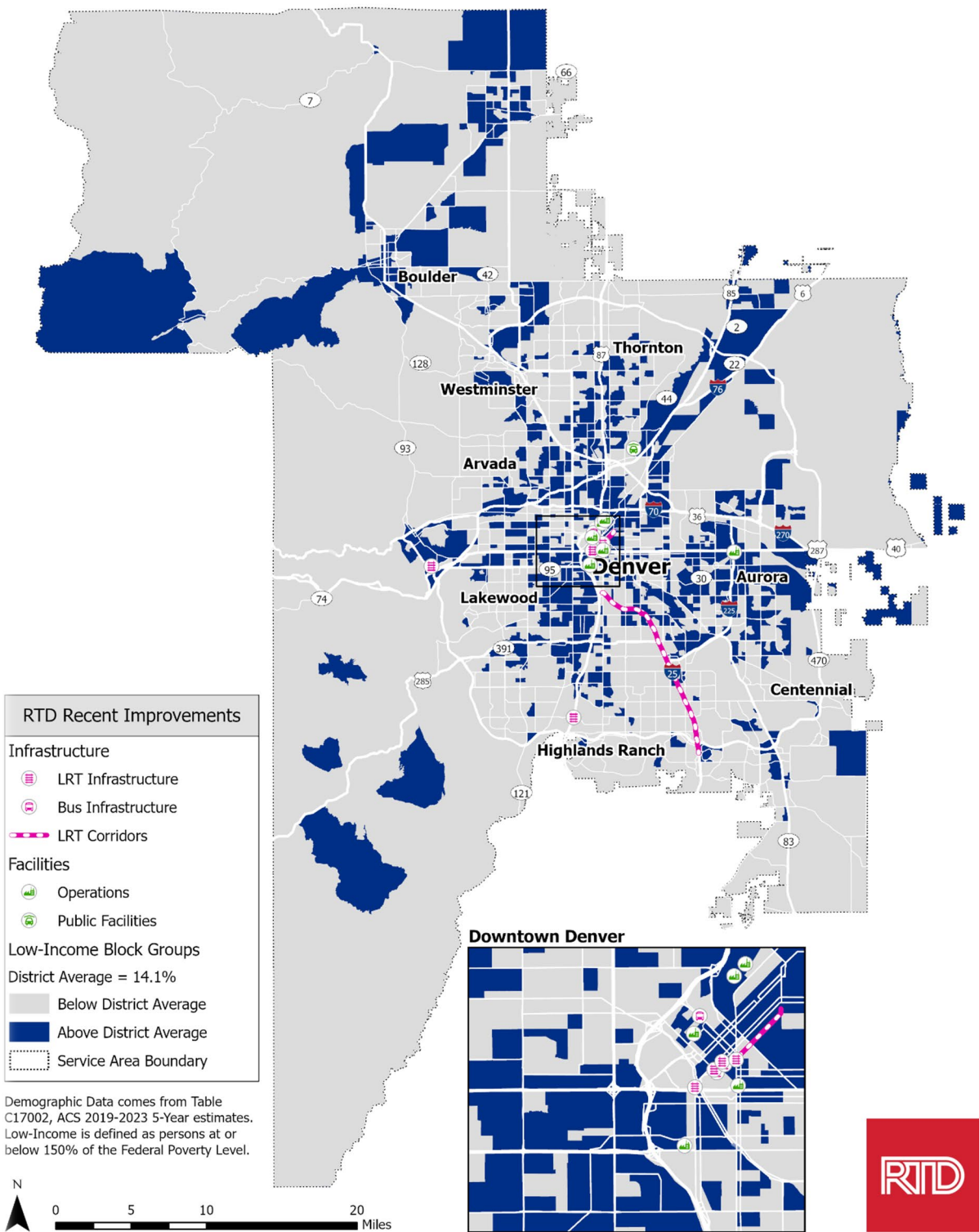
RTD 2025-2028 Title VI Program

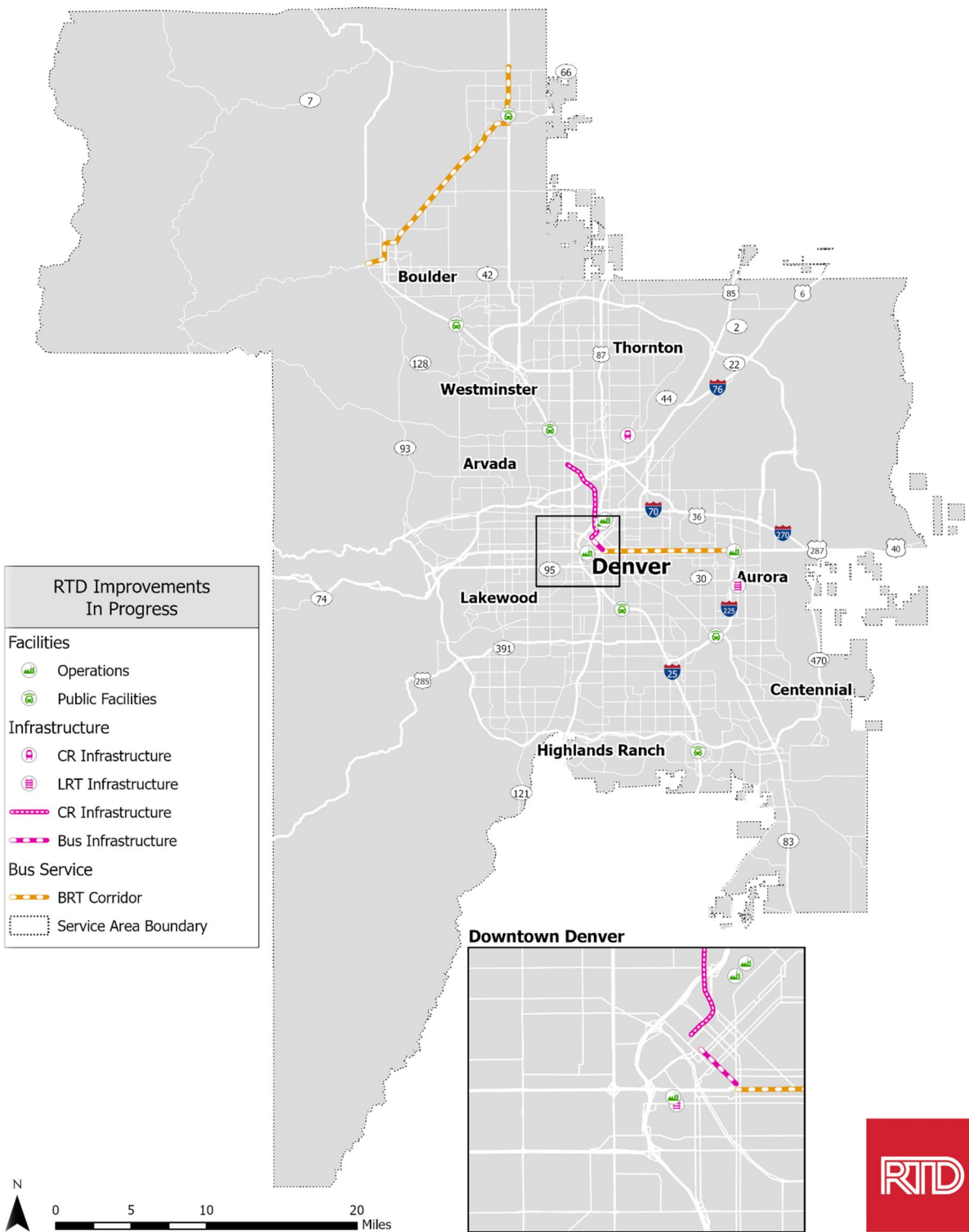
Figure 48. Recent Improvements by Facility with BIPOC Population



RTD 2025-2028 Title VI Program

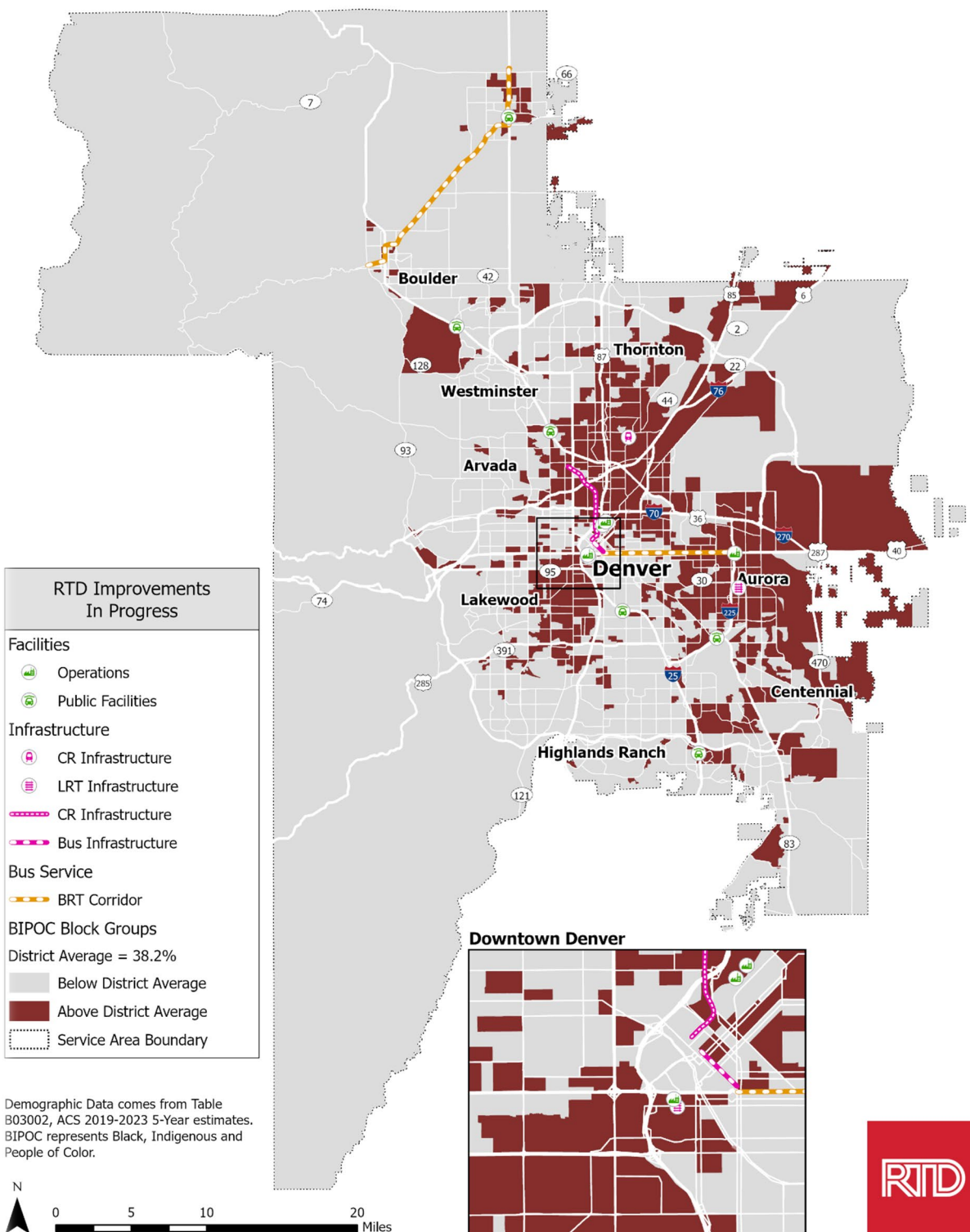
Figure 49. Recent Improvements by Facility with Low-Income Population





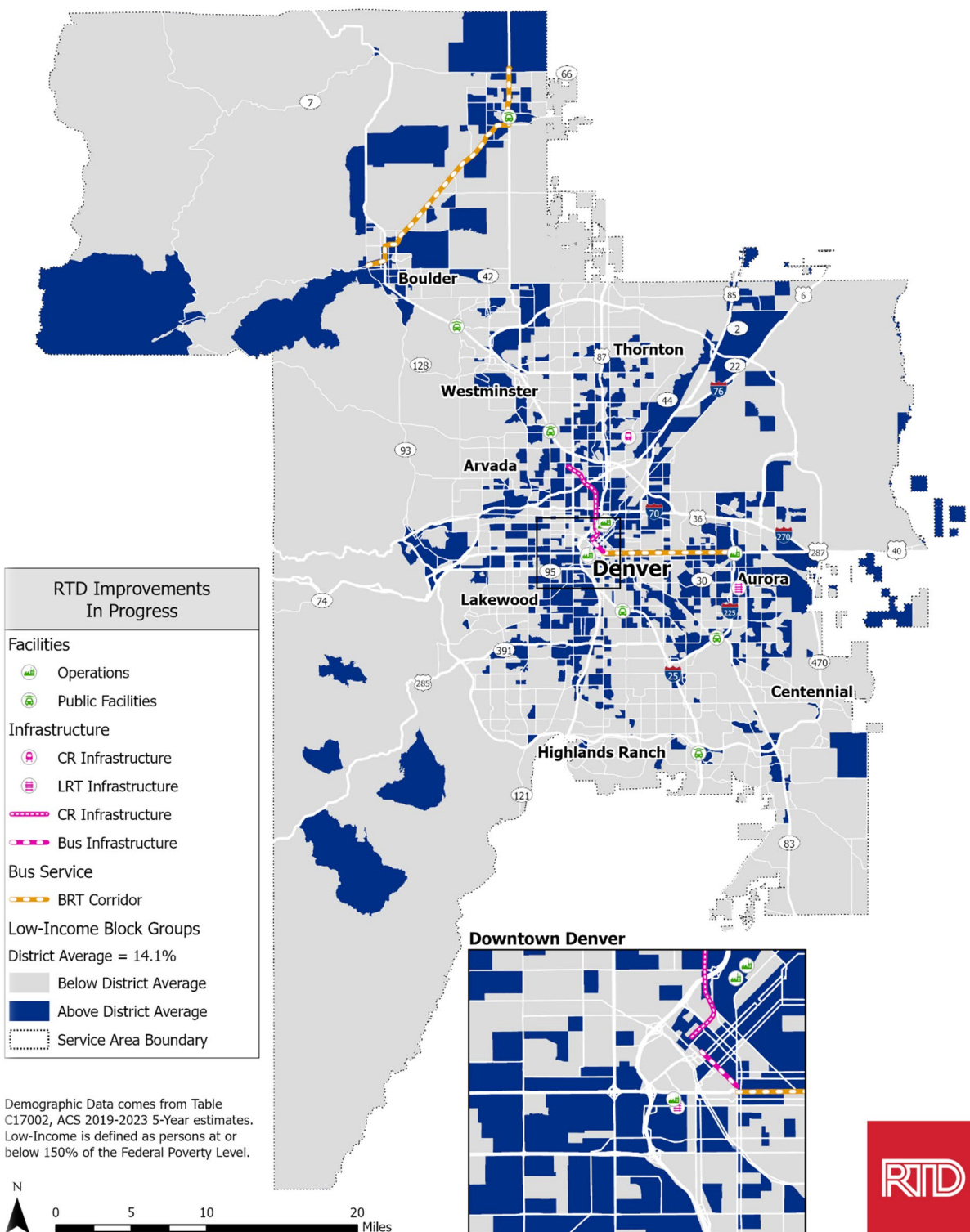
RTD 2025-2028 Title VI Program

Figure 51. In-Progress Improvements by Facility with BIPOC Population



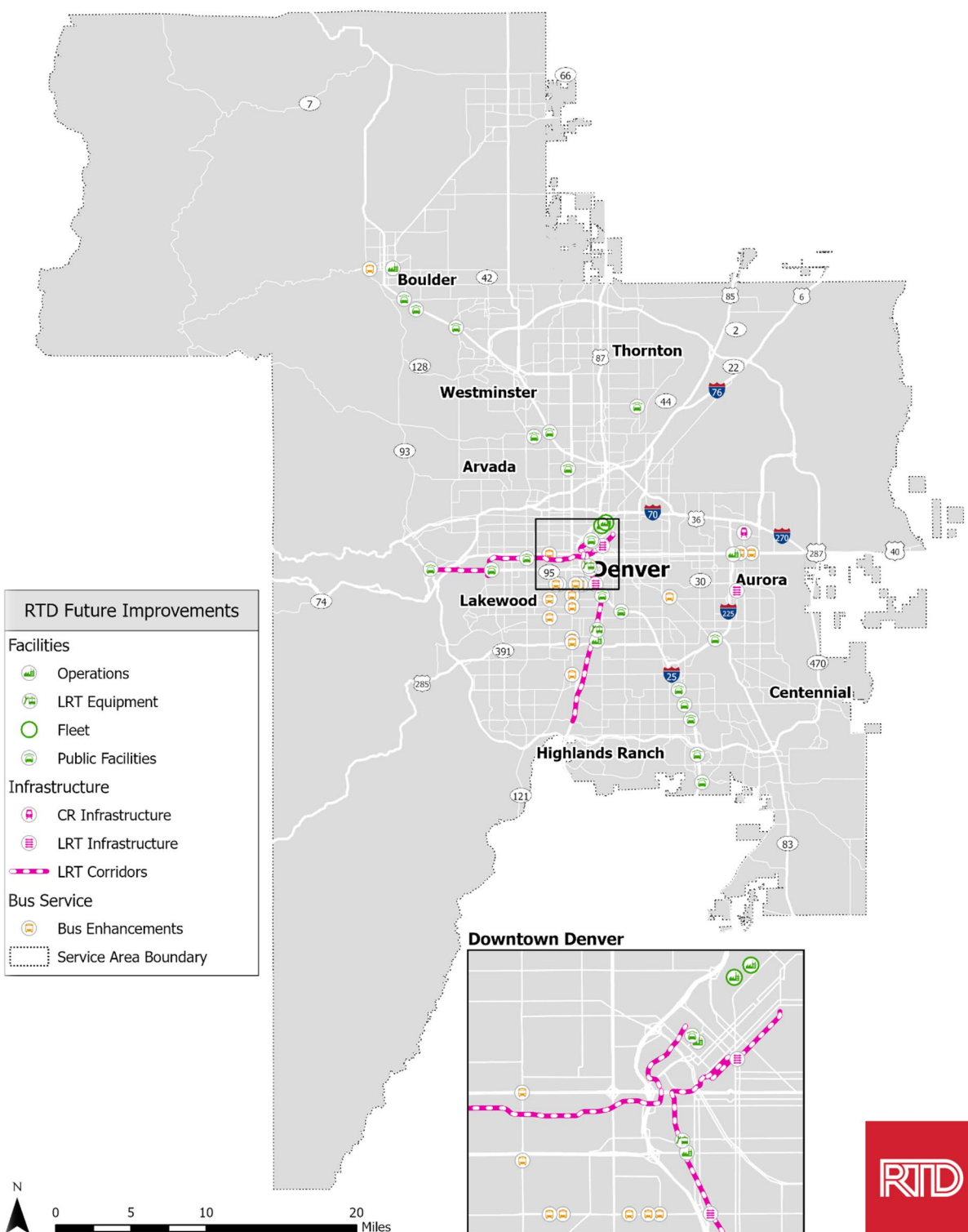
RTD 2025-2028 Title VI Program

Figure 52. In-Progress Improvements by Facility with Low-Income Population



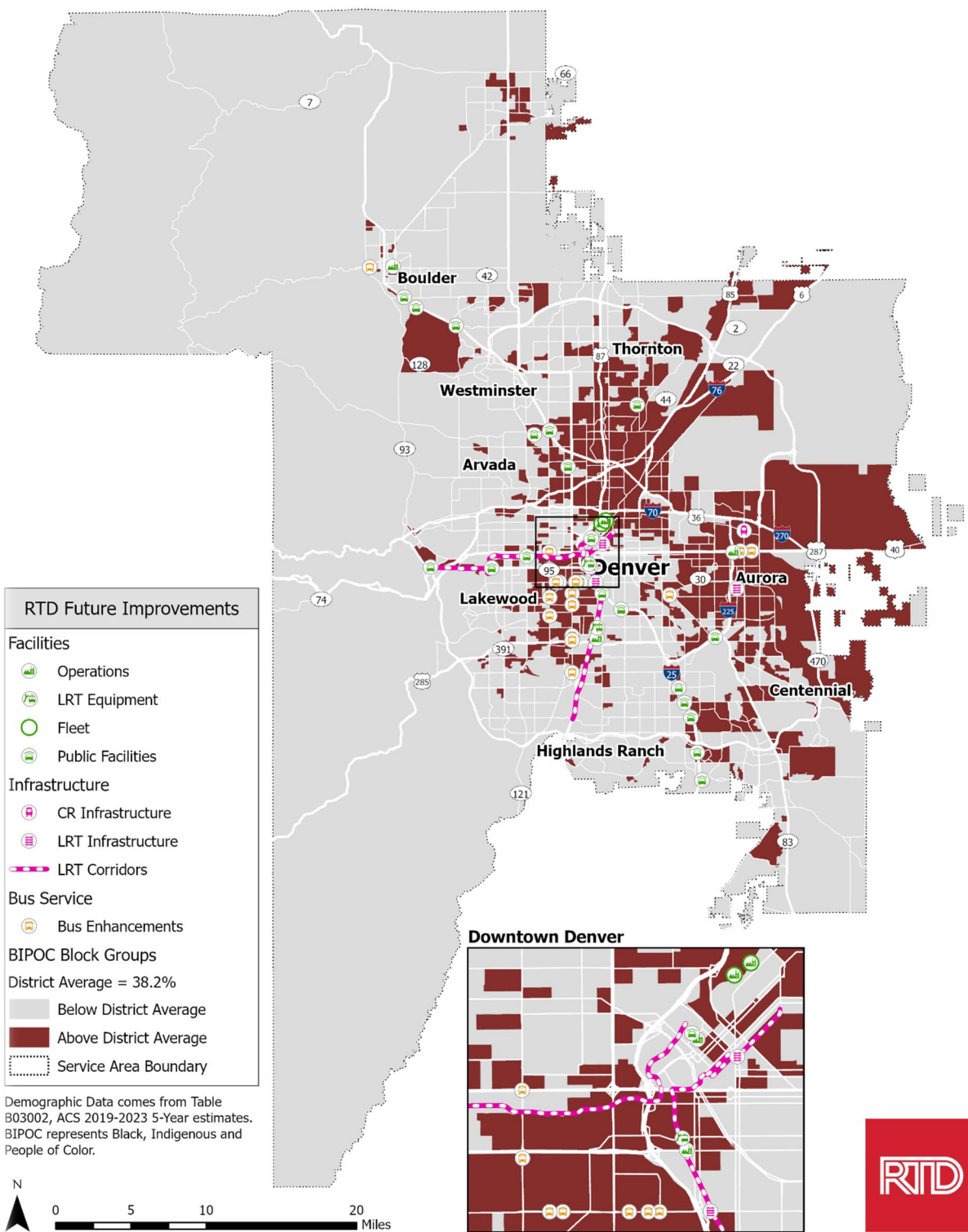
RTD 2025-2028 Title VI Program

Figure 53. Planned Improvements by Facility



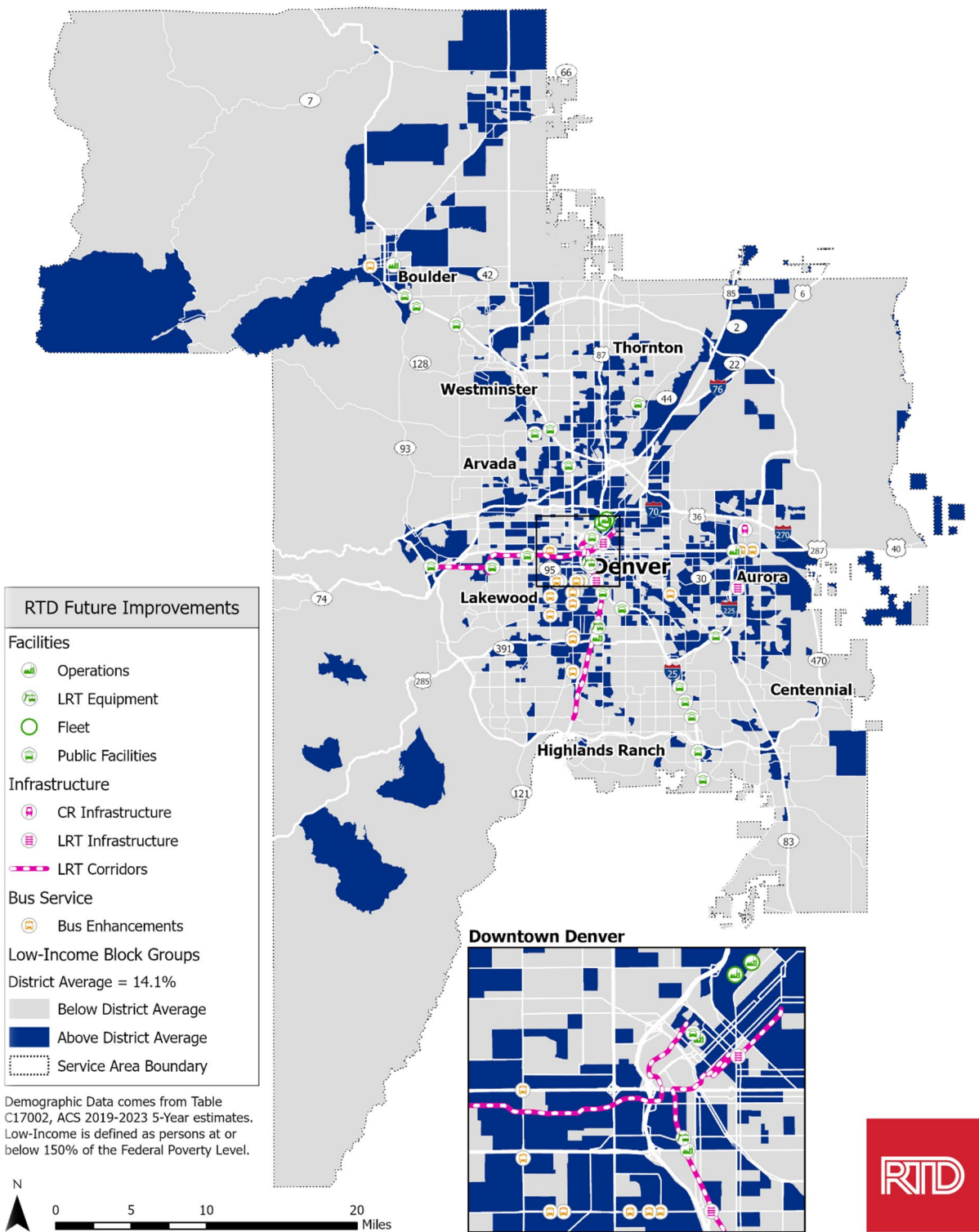
RTD 2025-2028 Title VI Program

Figure 54. Planned Improvements by Facility with BIPOC Populations



RTD 2025-2028 Title VI Program

Figure 55. Planned Improvements by Facility with Low-Income Populations



RTD 2025-2028 Title VI Program

Description of Engagement Efforts to Update Title VI Program

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 April 7 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.
 - Outreach through Public Engagement Contractors and Community Partners: RTD partnered with multicultural organizations that serve BIPOC, low-income, and linguistically diverse communities. These contractors engaged more than 1,209 individuals through 21 outreach events and promoted the program through multiple channels, including email (opened by 969 recipients), social media (565 total impressions), newsletters (sent to 6,071 subscribers), and radio. Servicios de la Raza featured the update in its newsletter, which reaches more than 45,000 people. RTD also sent a mass email to over 1,000 community-based organizations and direct service providers to encourage participation in the public 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.

As a result of these efforts, RTD received 54 survey responses on various elements of the Title VI Program. Key themes are outlined in the following sections, with complete responses provided in **Attachment Z**.

RTD 2025-2028 Title VI Program

Key Public Feedback Themes for the Overall Title VI Program

- Strong support for equity-centered updates: Many respondents welcomed the proposed Title VI Program updates, particularly the expanded focus on equity in service planning and fare policies. Advocates, community organizations, and transit-dependent customers emphasized the importance of raising the low-income threshold to 200% of the federal poverty level, noting that this change better reflects the economic realities of Denver's high cost of living. Supporters also praised improvements to language access, highlighting how translated materials and multilingual outreach are critical for immigrant and refugee communities. Several commenters shared personal stories of relying on RTD services for essential needs.
- Encouragement to strengthen inclusive participation practices: A recurring concern among participants was the need for RTD to improve public participation processes, particularly for historically underserved communities. Many found the 1,000-page draft document overwhelming and inaccessible, urging the agency to provide plain-language summaries, visual aids, and alternative formats for everyday people. Others stressed the importance of meeting customers where they are, whether at transit hubs, through trusted community organizations, or via culturally tailored outreach, rather than expecting them to navigate formal meetings or lengthy reports. Some commenters also requested greater transparency in how public input influences decisions.
- Demands for stronger accountability in service equity: While respondents supported the intent of the Title VI updates, some questioned whether RTD would fully commit to addressing disparities in service quality and access. Customers from underserved areas, including Aurora, Montbello, and Weld County, shared frustrations over inconsistent service, overcrowded routes, and lack of transit options — issues they felt were exacerbated by past decisions. Advocates urged RTD to not only analyze equity impacts before making changes but also to track and publicly report on outcomes, such as how service adjustments affect ridership in high-need communities.

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 provide 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.

RTD 2025-2028 Title VI Program

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 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 Program 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 Program policy changes. The majority of respondents expressed support for the changes, recognizing their potential to strengthen equitable access to transit services.

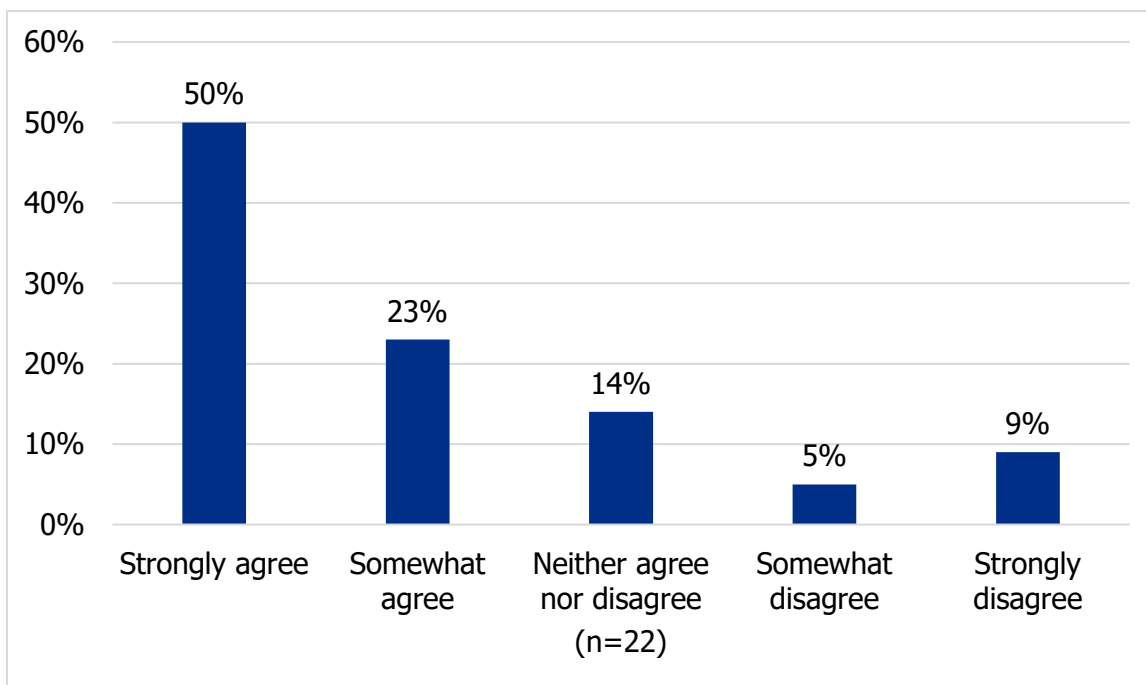
RTD 2025-2028 Title VI Program

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

Major Service Change Policy

As shown in Figure 56, approximately 73% of survey respondents reported that they somewhat or strongly agreed with the proposed changes.

Figure 56. Survey Results: Major Service Change Policy



Key Public Feedback Themes

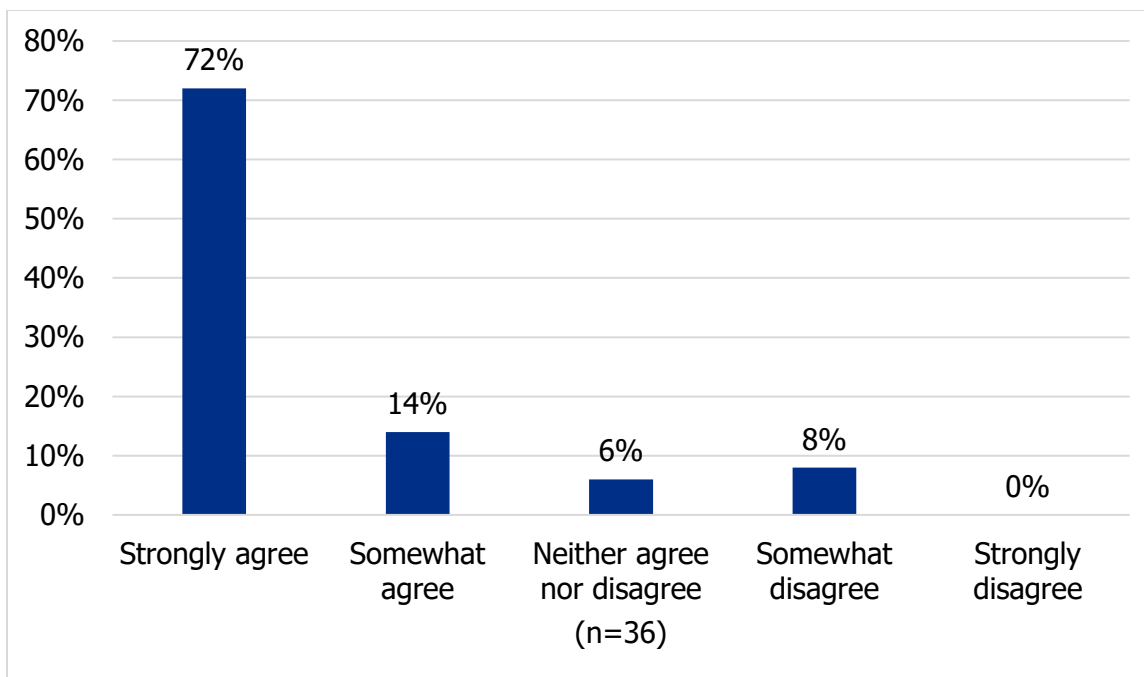
- Broad support for the policy updates as a step toward equity: Commenters expressed general support for the major service change policy, viewing it as a positive step toward improving transit equity and increasing oversight of service changes that may adversely affect BIPOC and low-income communities.
- 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 57, approximately 86% of survey respondents indicated that they somewhat or strongly supported the proposed changes.

Figure 57. Survey Results: Disproportionate Burden Policy



Key Public Feedback Themes

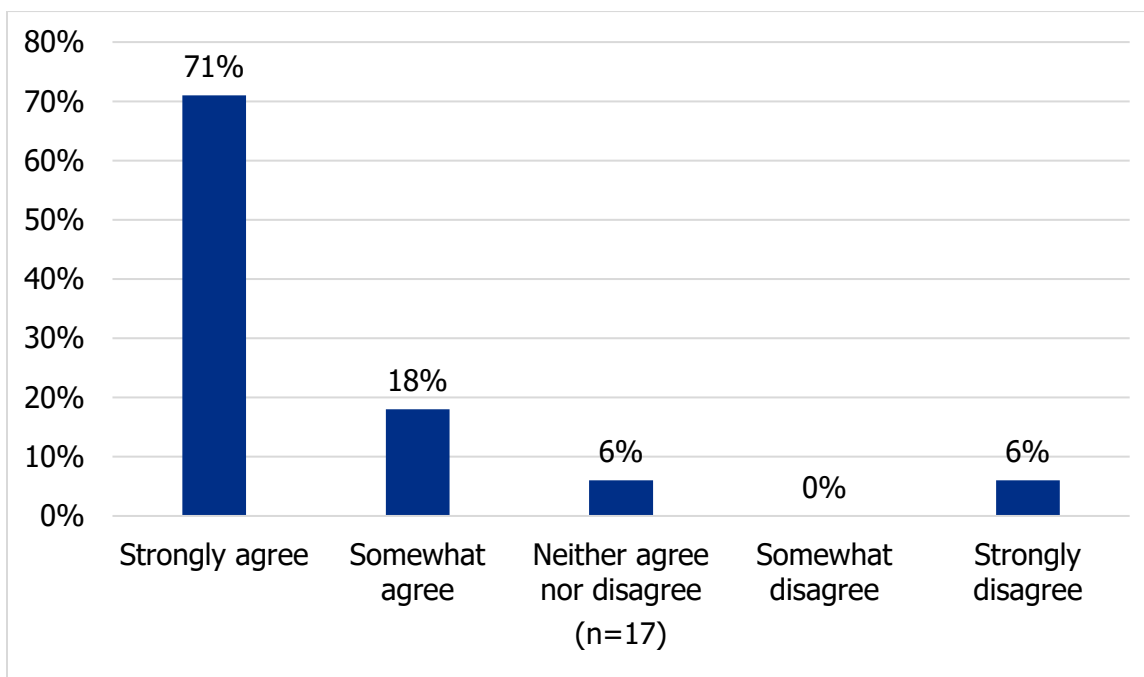
- Support for expanding the low-income definition: A significant portion of respondents expressed strong support for the updated low-income definition. Many emphasized the importance of adjusting the definition to reflect the realities of today's economy, especially in the Denver metro area where the 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 58 demonstrates that 89% of the survey respondents expressed support for the proposed changes, either somewhat or strongly.

Figure 58. 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: May 2025 Service Equity Analysis
Attachment O January 2025 Service Equity Analysis
Attachment P: September 2024 Service Equity Analysis
Attachment Q: Zero Fare for Youth Fare Equity Analysis
Attachment R: May 2024 Service Equity Analysis
Attachment S: September 2023 Service Equity Analysis
Attachment T: Systemwide Fare Study and Equity Analysis
Attachment U: May 2023 Service Equity Analysis
Attachment V: January 2023 Service Equity Analysis
Attachment W: MyRide Stored Value Discount Fare Equity Analysis
Attachment X: 2022 Service Performance Monitoring Report
Attachment Y: Transit Service Policies and Standards
Attachment Z: Feedback Received on Title VI Program Update

RTD 2025-2028 Title VI Program

Attachments

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

BOARD OF DIRECTORS REPORT

2025-2028 Title VI Program Update

Committee Meeting Date:
May 14, 2025
Board Meeting Date:
May 28, 2025

RECOMMENDED ACTION

For the Board of Directors (Board) to adopt the 2025-2028 Title VI Program Update to comply with federal laws, regulations, and guidelines related to Title VI of the Civil Rights Act of 1964 (Title VI).

STAFF REPRESENTATIVE

Martin Romero, Transit Equity Manager, Civil Rights Division

Carl Green Jr., Director of the Civil Rights Division

PRESENTATION LENGTH

30 minutes

BACKGROUND

Title VI prohibits any person from being excluded from participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, or national origin by recipients of federal financial assistance. As a recipient of federal funds, RTD must comply with the federal regulations set forth in 49 CFR Part 21, the terms of the Federal Transit Administration (FTA) Master Agreement, and FTA Circular 4702.1B, Title VI Requirements and Guidelines for FTA Recipients (4702.1B), to the extent consistent with applicable federal laws, regulations, requirements and guidance.

Title VI prohibits the following discriminatory actions on the basis of race, color, or national origin:

- Denial of program services, aids, or benefits
- Providing a different service, aid, or benefit, or providing these in a manner different than from that provided to others
- Subjecting a person to segregation or separate treatment related to the receipt of any service, aid, or benefit

Per Circular 4702.1B, RTD is required to submit a Title VI Program Update every three years. The objectives of the Title VI Program are to:

1. Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
2. Promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and

3. Ensure meaningful access to transit-related programs and activities by persons with limited English proficiency (LEP).

Pursuant to 4702.1B (II.1), the Board, as the body responsible for policy decisions, must approve the Title VI Program, which has multiple requirements, including system-wide service standards and policies. Pursuant to 4702.1B (IV.3), a recipient's Title VI Program public participation plan may be part of efforts that extend more broadly to include constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others. The Board last approved a Title VI Program update on May 24, 2022.

DISCUSSION

In considering this Recommended Action, the agency demonstrates alignment with the Strategic Priorities of Community Value and Customer Excellence.

Staff seeks the Board's approval of the proposed 2025-2028 Title VI Program, which must be submitted to the FTA by May 30, 2025. Staff released the draft 2025-2028 Title VI Program Update to the public for comment on April 7, 2025. Subsequently, staff presented the proposed policy changes at the April 9 Operations, Safety and Security Committee meeting.

The following discussion is divided into five sections:

- Proposed Policy Updates
- 2022 Title VI Service Performance Monitoring Report
- 2025 Language Access Plan
- 2025 Public Participation Plan
- 2024 Demographic Analysis Onboard Survey
- Final Public Outreach and Engagement Efforts

Proposed Policy Updates

Per 4702.1B (IV.7), RTD must establish a Major Service Change Policy, a Disparate Impact Policy, and a Disproportionate Burden Policy. These policies provide the foundational requirements for evaluating service and fare change proposals for equity. Disparate impact and disproportionate burden policies must be applied uniformly across mode and fare media and cannot be altered until the next Title VI Program submission. Staff recommends updates to the policies as discussed below.

Major Service Change Policy

All major service changes are subject to an equity analysis that includes an analysis of adverse effects. A Title VI Service Equity Analysis will be completed for all major service changes and will be presented to the RTD Board of Directors for its awareness, consideration and will be included in the subsequent RTD Title VI Program report with a record of action taken by the Board. RTD shall consider the degree of adverse effects and analyze those effects when planning major service changes.

Current Policy

A Major Service Change is currently defined as a 25% addition or reduction in the service hours of any route that would remain in effect for 12 or more months. Adverse Effect is currently 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.

Proposed Updates

RTD proposes to update its definitions of "major service change" and "adverse effect" to enhance the equity analysis and improve clarity.

The definition of a "major service change" would be expanded to include any change that involves a 25% or greater modification in service hours, route miles (including re-routes), daily service span, or frequency of any route/line, either within a single service proposal or cumulatively over a 36-month period. Additionally, the implementation of a new route/line or the elimination, discontinuation, or retirement of an existing route/line would also qualify as a major service change.

An "adverse effect" would be redefined as any impact on transit services resulting from major service changes, such as service reductions, route modifications, schedule adjustments, or other modifications, that disproportionately burden Black, Indigenous, and People of Color (BIPOC)¹ 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 compared to BIPOC and/or low-income populations.

All major service changes, as defined by these criteria, would continue to require a Title VI Equity Analysis. Any service change that does not meet these criteria would be classified as a minor service change and would not require an equity analysis.

Service Change Disparate Impact Policy

Current Policy

A major service change should not adversely affect a minority population 10% more than non-minority populations; this level of impact is considered disparate.

Proposed Updates

RTD proposes to update the policy to refer to minority populations as BIPOC populations as follows:

A majority service change should not adversely affect BIPOC populations 10% more than non-BIPOC populations; this level of impact is considered disparate.

Service Change Disproportionate Burden Policy

Current Policy

¹ 4702.1B defines "minority persons" (1.5.q) and "minority population" (1.5.r). Staff proposes that all such references in the Program Update refer to BIPOC and BIPOC population, respectively.

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 (HHS) Poverty Guidelines.

Proposed Updates

RTD proposes to redefine low-income populations as those whose household income is at or below 200% of the HHS Poverty Guidelines to better align with cost of living in the Denver region as follows:

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. If the major service change results in a disproportionate burden, RTD will consider modifying the proposal to mitigate the impact where practicable. 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.

Fare Change Disparate Impact and Disproportionate Burden Policies

Current Policies

RTD's current fare equity policies, addressing disparate impact and disproportionate burden, state that any fare price change or the average of multiple fare changes should not result in minority and low-income customers experiencing adverse impacts that differ by more than 5% compared to the overall ridership.

Proposed Policies

RTD proposes to add a definition of "fare change" to include increases or decreases in the price of fare media, the introduction or discontinuation of fare media (such as cash, paper passes, or electronic payment options), changes in fare types (e.g., Day Pass, Monthly Pass), adjustments to fare levels (e.g., Standard, Airport), modifications to customer categories (e.g., full-fare, seniors, individuals with disabilities, Medicare recipients, LiVE, and youth 19 and under), and changes to Ticket Vending Machine access (e.g., quantity, fees, or payment options).

RTD also proposes to update the policy to refer to minority customers as BIPOC customers as follows:

Any fare change should not result in BIPOC and low-income customers experiencing adverse impacts that differ by more than 5% compared to the overall ridership.

If a proposed fare change results in a disparate impact on BIPOC populations, RTD will consider modifying the proposal to mitigate the impact. If no less disparate impact alternative is available, RTD must have a substantial legitimate justification. 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.

2022 Title VI Service Performance Monitoring (SPM) Report

As detailed in Attachment W of the Draft 2025-2028 Title VI Program and in accordance with 4702.1B, (IV.6), RTD conducted a comprehensive analysis of six key service performance metrics: stop amenities,

vehicle loads, revenue hours, on-time performance, vehicle assignment, and service availability. The findings indicate that routes and lines serving minority and low-income communities generally perform as well as or better than those serving non-minority and non-low-income areas across most metrics. However, the analysis identified a marginal disparity in the revenue hours of bus service on minority routes, which receive 14.25% fewer revenue hours compared to non-minority routes (43.88% vs. 57.12%, respectively). This discrepancy underscores the need for enhanced improvements to ensure equitable service distribution.

2025 Language Access Plan

According to 4702.1B (III.9), agencies must develop a Language Assistance Plan (LAP) to provide language support to individuals with limited English proficiency (hereafter referred to as “linguistically diverse” persons) in the agency’s service area, ensuring compliance with Title VI 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 of Community Value and Customer Excellence, as well as the strategic initiatives of Welcoming Transit Environment and Customer and Community Connections.

As outlined in Attachment F of the Draft 2025-2028 Title VI Program, RTD’s updated LAP will direct the agency’s language assistance efforts during this period. RTD’s LAP is structured off the FTA Circular requirements. 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.

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 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 23 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.

2025 Public Participation Plan

According to 4702.1B(III.8), agencies are required to develop a Public Participation Plan (PPP) to ensure meaningful involvement of minority and linguistically diverse individuals in decision-making processes. As outlined in Attachment E of the Draft 2025-2028 Title VI Program, RTD's updated PPP will guide the agency's outreach and engagement efforts during this time frame. After a thorough review of the 2022 PPP and best practices from other transit agencies such as the Washington Metro Area Transit Authority and the Los Angeles County Metropolitan Transportation Authority, RTD's Communication and Engagement Department led an interdivision workgroup to develop this update.

The updated plan emphasizes intentional outreach to underserved communities and incorporates best practices for equitable public engagement that reflect their lived experiences and priorities. These include creating shared decision-making processes; moving beyond one-size-fits-all strategies by meeting people where they are; focusing on transparency by showing how public input informs decisions; ensuring access through plain-language materials, language assistance, and ADA-compliant, transit-accessible venues; and leveraging multicultural media to further expand the agency's reach. This approach reinforces RTD's commitment to equitable and inclusive public engagement.

2024 Demographic Analysis Onboard Survey

In accordance with 4702.1B(IV.5), RTD must collect and report demographic and service profile maps and charts using U.S. Census data as well as customer demographics and travel patterns using origin and destination or customer satisfaction surveys. As outlined in the Demographic Analysis section of the Draft 2025-2028 Title VI Program, RTD developed Geographic Information System (GIS) maps illustrating the distribution of BIPOC, low-income, and linguistically diverse populations in relation to services throughout the RTD service area. The Demographic Analysis Onboard Survey provides a snapshot of weekday trip characteristics and customer demographics collected through a systemwide onboard transit customer survey between August 19 to December 10, 2024.

Final Public Outreach and Engagement Efforts

In accordance with 4702.1B(III.5-6 and IV.4), RTD is required to notify beneficiaries of Title VI protection and complaint procedures, promote inclusive public participation, ensure meaningful access for linguistically diverse individuals, and employ appropriate methods to facilitate public comment and community engagement when setting or updating the Title VI program prior to Board approval. To fulfill these requirements, RTD has implemented a comprehensive outreach strategy to gather public input on proposed updates to the Title VI program, including the updated Title VI policies, Language Access Plan, Public Participation Plan, and Service and Performance Monitoring policies, in alignment with federal guidelines. RTD's outreach efforts included a news release sent on April 7, 2025, to inform the public about the proposed updates and how to participate. Additionally, RTD's Read-n-Ride publication, distributed on April 21, 2025, further promoted these engagement opportunities. The Transit Equity Office and Communications and Engagement Department attended in-person community events in April and May 2025, providing the public an opportunity to interact directly with RTD staff, ask questions, and offer feedback. RTD also worked with community partners, sending newsletters to organizations serving historically underserved populations to ensure broad distribution of information. In addition, RTD engaged Community-Based Organization (CBO) contractors, who participated in direct outreach at events, engaging with over 500 BIPOC and low-income individuals across four events. A mass email

was sent to more than 1,000 community-based organizations and direct service providers to encourage their participation in the comment process. Furthermore, RTD leveraged existing programs such as the LiVE income-based fare program (over 12,000 active customers) and the Transit Assistance Grant program (150 current grant-awarded organizations) to directly reach BIPOC and low-income individuals through nonprofit organizations serving customers with immediate needs. To maximize outreach, RTD utilized both organic and paid social media ads, promoting the public engagement efforts across its platforms. These outreach efforts were designed to ensure an inclusive and comprehensive public participation process in compliance with federal guidelines.

The proposed updates to RTD’s Title VI Program policies, along with the updates to the LAP and PPP, reflect the agency’s ongoing commitment to equitable transit service planning and compliance with FTA regulations. By refining the definitions of major service changes, adverse effects, low-income populations, and fare equity, these updates enhance transparency, improve analysis, and ensure that service and fare decisions are made with a strong equity focus. Expanding the criteria for equity analysis — such as including cumulative service changes over a 36-month period and raising the income threshold for low-income populations — allows for a more comprehensive assessment of impacts on underserved communities. Additionally, the results of the 2022 SPM process continue to inform RTD’s approach, demonstrating that the agency is committed to identifying and addressing any potential disparities in service delivery. The Board’s approval of these policy updates, including the SPM results, will adhere to FTA requirements pertaining to a transit agency’s governing board and strengthen RTD’s ability to proactively address potential disparities, uphold Title VI protections, and promote fair and inclusive transit access for all customers.

FINANCIAL IMPACT

The adoption of the 2025-2028 Title VI Program Update will not result in any direct or foreseeable financial impacts.

ATTACHMENTS:

- Attachment A – 2025-2028 Title VI Program Update Recommended Action May 14 2025 (PPTX)
- Attachment B - Draft 2025-2028 Title VI Program Update 1 (PDF)
- Attachment C - 2022 Title VI Service Performance Monitoring Report (PDF)
- Attachment D - 2024 Demographic Analysis Onboard Survey (PDF)

RESULT:	PASSED [12 TO 2]
MOVER:	Peggy Catlin, Director, District N
SECONDER:	Michael Guzman, Director, District C
AYES:	Bouquet, Buzek, Catlin, Guissinger, Gutschenritter, Guzman, Harwick, Nicholson, O'Keefe, Paglieri, Ruscha, Whitmore
NAYS:	Karen Benker, Matt Larsen
ABSENT:	Kathleen Chandler


Prepared by:

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Approved by:


Carl Green Jr., Director, Civil Rights 5/5/2025

Authorized by:


Debra A. Johnson, General Manager and CEO 5/9/2025