Gainesville Regional Transit System (RTS)

Title VI Plan

Date Adopted: _____

Title VI Plan Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks

Title VI Plan Activity Log
(Continued)

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Concerned Person (Signature)	Remarks

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1 Title VI/Nondiscrimination Policy Statement and Management Commitment to Title VI Plan

> *49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].*

The City of Gainesville Regional Transit System (RTS) assures the Florida Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency.

RTS further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.
3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against RTS.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.
8. Submit the information required by FTA Circular 4702.1B to the primary recipients (refer to Appendix A of this plan)

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

Signature

_____

Jesus Gomez
Transit Director, RTS
Date: _____

2 Introduction & Description of Services

RTS submits this Title VI Plan in compliance with Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and the guidelines of FTA Circular 4702.1B, published October 1, 2012.

RTS is a sub-recipient of FTA funds and provides service in the City of Gainesville. A description of the current RTS system is included in Appendix B.

2..1 Title VI Liaison

Kimberly Sweigard[1]

Transit Program Coordinator, DBE Liaison Officer

(352) 393-7852

34 SE 13 Road, Gainesville, FL 32601

RTS must designate a liaison for Title VI issues and complaints within the organization. The liaison is the focal point for Title VI implementation and monitoring of activities receiving federal financial assistance. Key responsibilities of the Title VI Liaison include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by FDOT or any other regulatory agency.
- Disseminate Title VI information to the public including in languages other than English, when necessary.
- Develop a process to collect data related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Implement procedures for the prompt processing of Title VI complaints.

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[1] Ms. Sweigard is filling in temporarily as the Title VI Liaison until the Transit Planning Manager position is filled.

- **First Time Applicant Requirements**

> *FTA Circular 4702.1B, Chapter III, Paragraph 3: Entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency.*

RTS is not a first time applicant for FTA/FDOT funding. The following is a summary of RTS's current and pending federal and state funding.

Current and Pending FTA Funding

1. FTA (5307) Operating, FY16-17, $2,200,000

2. FTA (5307) Capital, FY16-17, $6,498,408

Current and Pending FDOT Funding

1. FDOT Service Development Grants, FY16-17, $648,674

2. FDOT Grants (5310, 5311, 5339), FY16-17, $640,387

3. FDOT Block Operating Grant, FY16-17, $1,843,539

During the previous three years, FDOT did not complete a Title VI compliance review of RTS. RTS has not been found to be in noncompliance with any civil rights requirements.

- **Annual Certifications and Assurances**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

> *FTA Circular 4702.1B, Chapter III, Paragraph 2: Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the Title VI regulations.*

RTS will remain in compliance with this requirement by annual submission of certifications and assurances as required by FDOT.

- **Title VI Plan Concurrence and Adoption**

This Title VI Plan received FDOT concurrence on _____. The Plan was approved and adopted by RTS's governing body, the City of Gainesville City Commission, during a meeting held on _____. A copy of the meeting minutes and FDOT concurrence letter is included in Appendix C of this Plan.

3   Title VI Notice to the Public

> *FTA Circular 4702.1B, Chapter III, Paragraph 5: Title 49 CFR 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.*

- **Notice to Public**

Recipients must notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Plan. The notice must include:

- A statement that the agency operates programs without regard to race, color and national origin
- A description of the procedures members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedure members of the public should follow in order to file a discrimination complaint against the grantee

The notice is included in Appendix D of this Plan along with Spanish and Chinese versions of the notice.

- **Notice Posting Locations**

The Notice to Public will be posted at many locations to apprise the public of RTS's obligations under Title VI and to inform them of the protections afforded them under Title VI. At a minimum, the notice will be posted in public areas of RTS's office(s) including the reception desk and meeting rooms, and on RTS's website at http://go-rts.com/feedback-page/#titlevi. Additionally, RTS will post the notice at stations and on transit vehicles.

4   Title VI Procedures and Compliance

> *FTA Circular 4702.1B, Chapter III, Paragraph 6: All recipients shall develop procedures for investigating and tracking Title VI complaints filed aginst them and make their procedures for filing a complaint available to member of the public.*

- ## Complaint Procedure

RTS is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Any person who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Act of 1964, its amendments and related statutes, by the Gainesville Regional Transit System (RTS) in its role of planning and programming of federal funds may submit a written complaint. To comply with 49 CFR part 21.9(b), RTS maintains the following procedure to receive, review, resolve and track complaints related to Title VI.

How to Submit a Title VI Complaint
Complaints may be submitted for discrimination on the basis of race, color, national origin or language. Any such complaint shall be submitted in writing no later than 180 days after the date the person believes the discrimination occurred. Written complaints shall be submitted to the City of Gainesville, Office of Equal Opportunity.

 All telephone calls, walk-ups, or emails regarding a Title VI complaint shall be directed to the City of Gainesville Office of Equal Opportunity. The person wishing to file a complaint must complete and sign a Title VI Complaint Form and return it by mail to the address on the form or drop the form off at the Office of Equal Opportunity at City Hall. The Title VI Complaint Form can be picked up at the Old Library Building address below or downloaded from the RTS website at: http://www.go-rts.com/feedback.php#titlevi.

Walk-in Address:
Old Library Building
222 E. University Ave., 2nd Floor
Gainesville, FL 32602

Phone Numbers:
(352) 334-5051 (Voice)
(352) 334-2069 (TDD)

Mailing Address:
City of Gainesville
Office of Equal Opportunity
PO Box 490, Mail Station 52
Gainesville, FL 32602

Review of Complaints

Upon receipt of complaint, The City of Gainesville Office of Equal Opportunity will review the Title VI complaint and provide written acknowledgement of the receipt to the complainant within fifteen (15) business days.

The review will include the gathering of additional information from the complainant and/or the alleged discriminating party(ies). Upon completion of the review, the City of Gainesville Office of Equal Opportunity Director shall submit a report of findings to RTS. If the complaint is found to have merit, the report of the Office of Equal Opportunity shall also include proposed resolutions and/or recommended actions, such as:

- Forwarding the complaint to a responsible implementing agency.
- Identifying remedial actions that are available to offer redress.
- Identifying possible improvements to the RTS Title VI process.

If more time is required for the review, the Office of Equal Opportunity Director shall notify the complainant and RTS Title VI Coordinator of the anticipated additional time needed.

Resolution of Complaints

The City of Gainesville Office of Equal Opportunity Director shall submit a report of findings to the RTS Director and Title VI Coordinator for discussion and action. A copy of the report shall also be provided to the complainant. The City of Gainesville shall issue a written response to the complainant describing any action taken. The response shall be issued no later than sixty (60) calendar days after the date on which the complaint was received. If more time is required for action, the City of Gainesville shall notify the complainant of the anticipated additional time needed.

Concurrent Complaints and Appeal

The procedures described above do not in any way abridge the right of the complainant to file concurrent complaints with other state of federal agencies and/or seek private counsel. The procedures above are part of an administrative resolution process that does not included punitive damages or compensatory payment. The complainant has the right to appeal the City of Gainesville's response by submitting the complaint to the Federal Transit Administration, as described in FTA Circular 4702.1B (http://www.fta.dot.gov/civilrights/civil_rights_5088.html) Notice of this right shall be included in the City of Gainesville's response to the complainant.

Complaint Tracking

The City of Gainesville will maintain a log of Title VI complaints received. This log will be available for public review at the City of Gainesville Office of Equal Opportunity, at 222 E. University Avenue, 2nd Floor, Gainesville, FL 32602, during business hours. The log will include the date of investigation, a summary of allegations, status of investigation, and the action taken by the recipient of federal funds.

- **Complaint Form**

Copies of the complaint form in English, Spanish and Chinese are provided in Appendix E and on RTS's website (http://www.go-rts.com/feedback.php#titlevi).

- **Record Retention and Reporting Policy**

FTA requires that all direct and primary recipients document their compliance by submitting a Title VI Plan to their FTA regional civil rights officer once every three (3) years. RTS will submit Title VI Plans to FDOT for concurrence any time a major change in the Plan occurs.

Compliance records and all Title VI related documents will be retained for a minimum of three (3) years and reported to the primary recipient annually.

- **Sub-recipient Assistance and Monitoring**

RTS does not have any sub-recipients to provide monitoring and assistance. As a sub-recipient to FDOT, RTS utilizes the sub-recipient assistance and monitoring provided by FDOT, as needed. In the future, if RTS has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

- **Contractors and Subcontractors**

RTS is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. RTS, contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every contract with contractors and subcontractors subject to Title VI regulations.

4..1   **Nondiscrimination Clauses**

During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "Contractor") must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, "USDOT") Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.

2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section

21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.

4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Florida Department of Transportation,* the *Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Florida Department of Transportation*, the *Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* as appropriate, and shall set forth what efforts it has made to obtain the information.

5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, RTS shall impose contract sanctions as appropriate, including, but not limited to:
   a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
   b. cancellation, termination or suspension of the contract, in whole or in part.

6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the RTS, Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

Since 2009, RTS has contracted with MV Transportation, Inc. as the sole provider of paratransit services in the RTS service area. As part of their contractual obligation and in accordance with Title VI of the Civil Rights Act, MV Transportation does not discriminate on the grounds of race, color, or national origin and it agrees to comply with applicable Federal implementing regulations and other implementing regulations that FTA may issue. MV Transportation notifies employee of their obligation under Title VI in their employee handbook, as well as informational notices in their employee break room. Any Title VI complaints received by MV Transportation, Inc. are required to be reported to RTS as they occur.

5   Title VI Investigations, Complaints, and Lawsuits

FTA Circular 4702.1B, Chapter III, Paragraph 7: In order to comply with the reporting requirements of 49 CFR 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations….; lawsuits, and complaints naming the recipient.

In accordance with 49 CFR 21.9(b), RTS must record and report any investigations, complaints, or lawsuits involving allegations of discrimination. The records of these events shall include the date the investigation, lawsuit, or complaint was filed; a summary of the allegations; the status of the investigation, lawsuit, or complaint; and actions taken by RTS in response; and final findings related to the investigation, lawsuit, or complaint. The records for the previous three (3) years shall be included in the Title VI Plan when it is submitted to FDOT.

RTS has had three investigations, four complaints, and no lawsuits involving allegations of discrimination on the basis of race, color, or national origin over the past three (3) years. A summary of these incidents is recorded in Table 1.

Table 1: Summary of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.	05/29/2013	Gender/Retaliation	No Cause	N/A
2.	02/11/2014	Race/Retaliation	No Cause	N/A
3.	01/26/2016	Gender/Race	No Cause	N/A
Complaints				
1.	01/29/2014	Race	Dismissed – No Prima Facie	Dismissed
2.	02/03/2014	Gender/Religion	Dismissed – No Prima Facie	Dismissed
3.	10/07/2014	Race/Gender	Dismissed – No Prima Facie	Dismissed
4.	10/08/2015	Disability	Did not file official complaint within 180 days	N/A
Lawsuits	None			

6   Public Participation Plan

FTA Circular 4702.1B, Chapter III, Paragraph 4.a.4: Every Title VI Plan shall include the following information: A public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Plan submission. A recipient's targeted public participation plan of minority populations 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 Public Participation Plan (PPP) for RTS was developed to ensure that all members of the public, including minorities and Limited English Proficient (LEP) populations, are encouraged to participate in the decision making process for RTS. The PPP is included as Appendix F to this Title VI Plan.

6.1.1   Current Outreach Efforts

RTS is required to submit a summary of public outreach efforts made over the last three (3) years. The following is a list and short description of RTS's recent, current, and planned outreached activities.

FY 2014

October

October 3, 2013 – UF Multimedia Writing Class at the Gannett Auditorium. Discussion and interview on transportation and sustainability topics. About 60 UF students in attendance.

October 3, 2013 – UF Intern Fair. Interview and resume collection for open RTS intern position, while also answering bus service questions.

October 23, 2013 – Citizens Academy. RTS presentation of RTS' service, budget, successes and challenges and distributed promotional items. About 25 citizen attendees.

November

November 14, 2013 – Chamber of Commerce (CoC) After Hours at the Hilton UF Conference Center.

November 20, 2013 – Fall Citizen's Academy CRA Bus Tour from 10:45am to 12:00pm.

December

December 02, 2013 – Public meeting was held for proposed transit service changes of RTS spring schedule.

December 11, 2013 – Career Day at Metcalfe Elementary. Presentation on how to ride bus. About 600 children attended.

February

February 26, 2014 – GO Enhance RTS Study public meeting at GRU multi-purpose room. Shared the findings of the GO Study with the public.

March

March 12, 2014 – ICBR Green Team Coalition's Sustainability Fair.   Discussed environmental friendliness of transit and answered questions about service.   About 100 attendees.

March 26, 2014 –   RTS presentation of services, budget, successes and challenges to local citizens. About 25 in attendance.

March 26, 2014 – Public meeting was held for proposed transit service changes of RTS summer schedule.

April

April 16, 2014 – Spring 2014 Citizen's Academy bus tour.

May

May 17, 2014 –Sweet Dreams Touch-A-Truck event. Presentations given about service and questions answered. Over 300 in attendance.

May 29, 2014 – City of Gainesville's Ride & Stride Program celebration of National Bike Month Booth set up and shared information on the Regional Transit System.

June

June 9, 2014 – CoC Community Transportation Dialogue from 6-7:30pm at Springhill Missionary Baptist Church. Answered questions about transportation ballot initiative. About 50 in attendance.

June 17, 2015 – CoC RTS Harley Davidson Connect Me program. Discussion and question answering about service. About 50 in attendance.

July

July 10, 2014 – July Museum Night at the Harn Museum of Art Set up an information table with 700 attendees.

July 23, 2014 – Public meeting was held for proposed transit service changes of RTS fall schedule.

July 24, 2013 – ADA Celebration 2014 Disability Awareness Training & Expo at Sidney Lanier Development Center handed out information sheets and answered questions from about 300 attendees.

August

August 5, 2014 – Take Back the Night. "Outreach booth set up and distributed information at this annual neighborhood/ family oriented safety event.

August 18, 2014 - UF's New Graduate Student Fall Orientation Provided a table display in the Reitz Union Ballroom offering information, maps and promotional materials. Over 1500 new graduate students attended.

August 20, 2014 – CoC Business Showcase 2014. Set up a table to showcase the convenience of the transit system and answer questions. About 500 in attendance.

August 25-26, 2014 – RTS participated in UF's Ask Me Program 2014. Distributed schedules, route summary sheets and promotional materials.

September

September 3, 2014 – Chamber After- Hours event hosted by UF Health Shands. Answered questions about transit and solicited advertisers.

September 9, 2014 –City of Gainesville Job & Trade Fair at the MLK Multi-Purpose Center. Provided information on available job opportunities and answered service questions.

September 19, 2014 –FDOT District 2 Transportation Workshop in Lake City.

FY 2015

October

October 9, 2014 – UF Multimedia Writing Class at the Gannett Auditorium.. Discussion and interview about current RTS initiatives and environmentally friendliness of transit.

October 15, 2014 – Fall Citizen Academy's Connecting our Community 2nd Session at Public Works Department. Presentation of services, programs, budget and challenges to about 25 attendees.

November

November 17, 2014 – RTS 40th Anniversary and Ribbon Cutting for the Corrine Brown Transit Facility. Presentation on new facility and answered questions about service. About 150 people in attendance.

November 19, 2014 – Fall 2014 Citizen's Academy CRA Bus Tour.

December

December 10, 2014 – Ad Fed of Gainesville Holiday Social. Answered questions about services and solicited advertisers.

February

February 5, 2015 – CoC Networking Event Celebrates New Location JVC Broadcasting with a Ribbon Cutting Event. Answered questions about service to about 100 attendees.

February 9, 2015 – Career Day H. Bishop Elementary School. RTS Transit Operator did presentation for 17 elementary students.

February 10, 2015 –UF Institute of Transportation Engineering tour of new facilities. Presentation and discussion about services and facilities. About 20 students were in attendance.

February 12, 2015 - Four Seasons Garden Club at the Senior Center. Presentation on our services and questions answered from about 25 attendees.

February 17, 2015 – Chamber of Commerce Business Before Hours at the UF Hilton Conference Center. Service questions answered and potential advertisers solicited.

March

March 11, 2015 – Chamber of Commerce Annual Gator Nationals After- Hours Tradition at Gator Raceway, Answered questions about service and solicited potential advertisers.

March 18, 2015 – RTS Operations hosted the Florida Transit Safety Network Conference at the Corrine Brown Transit Facility that was attended by over 20 Florida transit professionals.

March 25, 2015 – Public meeting was held for proposed transit service changes of RTS summer schedule.

March 26, 2015 – Ad-fed Luncheon-The Perfect Pitch -   Meeting to discuss sales approaches and answer questions about transit advertising/service.

April

April 8, 2015 – RTS hosted the Public Works Citizens Academy Meeting – 8:30am to 12:30pm for 15 Citizens. Public Works/RTS Marketing staff set up outreach tables to distribute information about department/division services.

April 9, 2015 – 2015 City of Gainesville Employee Rally. Provided information to City employees about services and answered questions.April 22, 2015 – Spring 2015 Citizen's Academy bus tour. Ten Citizens participated in the CRA Tour.

April 24, 2015 – Talbot Elementary Vehicle Day. RTS provided a bus and driver for the event. The driver gives a brief tour of the bus and talks about how "To Ride the Bus"

May

May 13, 2015 – Gainesville Clean Water Partnership RTS Facility Tour.   Gave presentation/tour of facilities while answering questions about service from about 10 attendees.

May 16, 2015 – 2015 Sweet Dreams Touch-A-Truck event, held from 9am to 2pm at the Northeast Complex. Presentation of services and questions answered. About 500 in attendance.

May 22, 2015 – Vehicle Day Duval Elementary. 230 children were in attendance. RTS provided a bus and driver for the event. The driver gives a brief tour and presentation on riding the bus and what it is like to be a RTS Transit Operator.

May 28, 2015 - Vehicle Day Norton Elementary.. 680 students and teachers were in attendance. Staff gave a brief tour and presentation on riding the bus

July

July 2, 2015 – Alachua County Veteran Job Fair at the MLK Center. Presentation on open positions and questions answered about service from over 200 attendees.

July 16, 2015 – Public meeting was held for proposed transit service changes of RTS fall schedule.

July 23, 2015 – ADA Expo celebrating the 25th Anniversary of the Americans with Disabilities Act. Information given about services and questions answered from about 100 attendees.

August

August 12, 2015 – Earth Fare Ribbon Cutting.   Answered questions about services and advertising on buses.

August 17, 2015 – UF's Fall 2015 New Graduate Student Orientation. The RTS team attended and provided a table display for new students, offering information, maps and promotional materials.   Over 1500 in attendance.

August 24, 2015 – UF's Ask Me Program 2015. The RTS marketing team distributed schedules, route summary sheets and promotional materials.

September

September 1, 2015 – City of Gainesville Job Fair at the MLK Multi-Purpose Center. Provided information on potential RTS jobs and handed out promotional materials.   About 250 attendees.

September 2, 2015 – Depot Park Groundbreaking Ceremony. Booth provided information and answered questions about services to over 200 attendees.

FY 2016

October

October 14, 2015 – Santa Fe College Sustainability Fair. They raised awareness about services, the benefits of using public transportation and RTS job opportunities.   Over 100 in attendance.

October 21, 2015 – Citizens Academy Public Works Presentation given to raise awareness of RTS services and the benefits of public transportation.

October 21, 2015 – UF's Sustainable Transportation Fair .RTS sustainability initiatives were highlighted for the outreach table. Provided route information, answered service questions and handed out promotional and educational materials to over 200 attendees.

October 24, 2015 – Quiet Courage Committee hosted a Tribute to Rosa Parks on the 10th anniversary of her passing. Presentation given and questions answered to about 30 attendees.

October 27, 2015 –CareerSource's Sneak Peek event at their new Gainesville Career Center. This was a networking event to refresh professional relationships and discuss our current and future pass program partnerships.

November

November 9, 2015 –Tour of RTS facilities to City Commissioner and attendees.. Provided information about RTS services, community initiatives and the transit facility project.

November 18, 2015 – Fall 2015 Citizen's Academy CRA Bus Tour..

December

December 4, 2015 –Santa Fe College Internship Fair. Provided information about RTS services, projects and marketing and graphic design job opportunities.

December 17, 2015 – Public meeting was held for proposed transit service changes of RTS spring schedule.

January

January 21, 2016 –Florida Arbor Day Celebration at the Matheson History Museum.   Networking event with key local transit decision makers.

January 28, 2016 – Gainesville Area CoC Annual Meeting. Networking event with key transit decision makers. Responded to questions about services.

February 18, 2016 – CoC After Hours Grub Hub. Networking event with local decision makers to answer service questions and solicit partnerships.

February 23, 2016 – Bo Diddley Plaza Sneak Peek. Networking event with local decision makers to answer service questions and solicit partnerships.

February 23, 2016 – Citizen Advisory Group Meeting.   Presentation about system performance, upcoming projects and challenges. About 10 in attendance.

February 25, 2016 – Liquid Creative Block Party. Networking event to answer questions about service and soliciting partnerships.

March 3, 2016 – RTS Bus Roadeo. Event open to public showcasing RTS operator skills, while providing information on services.

March 16, 2016 – City of Gainesville Citizens' Academy. Presentation and facility tour to about 25 attendees. Answered service questions and provided system information.

March 16, 2016 – CoC GatorNationals After Hours. Networking event to share system information and solicit partnerships. Over 150 in attendance.

April 6, 2016 – UF Campus Earth Day. Informational booth set up to answer questions about services and promote transit. Over 300 in attendance.

April 12, 2016 – Santa Fe College Rally 4 Earth. Informational booth set up to answer questions about services and promote transit. About 100 attendees.

April 20, 2016 – CoC Business to Business Expo. Informational booth set up to answer questions about service, promote transit and solicit partnerships. Over 300 attendees.

April 20, 2016 – Citizens' Academy Bus Tour. Tour of City projects using public transportation. About 25 in attendance.

April 26, 2016 – CareerSource Job Fair. Booth set up to provide information on available jobs within agency, also answered questions about service.   About 60 attendees.

April 27, 2016 – UF ICBR Sustainability Fair. Booth set up to answer service questions and promote public transit. About 30 attendees.

April 28, 2016 – City Employee Rally. Booth set up to answer questions about service and promote unlimited prepaid access for City of Gainesville employees.

May 19, 2016: AdFed – FPRA Luncheon. Networking event to answer questions about service and solicit new partnerships.

June 16, 2016 – CoC Appreciation Party. Networking event with local decision makers to answer questions and solicit partnering opportunities.

June 20, 2016 – UF Health Community Task Force Meeting. Meeting to answer questions about service and discuss possible partnerships with local health providers and other community entities. About 20 attendees.

June 21, 2016 – CoC College Brothers Ribbon Cutting. Networking event to solicit new partnerships and answer service questions.

July 18, 2016 – Ms. Wheelchair Florida Event. Press conference and photo event promoting public transportation and ADA services in the area. About 30 attendees.

July 28, 2016 – ADA Celebration at Senior Center.   Booth shared with ADA service provider to answer questions about service and promote same. About 30 attendees.

August 2, 2016 – National Night Out.   Service and system information available at third party booth. Staff answered service questions.

August 15, 2016 – UF Graduate Student Orientation. Booth provided information to about 1500 incoming graduate students about services.

August 22, 2016 – UF Ask Me. Booth provided information on UF campus/City-wide transit service and trip planning.

August 29, 2016 – SOMA Workshop. Provided information about service and bus stops during workshop on roadway development.

7 Language Assistance Plan

> *FTA Circular 4702.1B, Chapter III, Paragraph 9: Recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP).*

RTS operates a transit system within the City of Gainesville. The Language Assistance Plan (LAP) has been prepared to address RTS's responsibilities as they relate to the needs of individuals with Limited English Proficiency (LEP). Individuals, who have a limited ability to read, write, speak or understand English are LEP. RTS is federally mandated (Executive Order 13166) to take responsible steps to ensure meaningful access to the benefits, services, information and other important portions of its programs and activities for individuals who are LEP. RTS has utilized the U.S. Department of Transportation (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LAP. The LAP is included in this Title VI Plan as Appendix G.

Appendix H shows that of 237,943 people in Alachua County 8,174 identified as speaking English less than "very well", or approximately 3.4% of the total population.

8 Transit Planning and Advisory Bodies

> *FTA Circular 4702.1B, Chapter III, Paragraph 10: Recipients that have transit-related, non-elected planning boards, advisory councils or commitees, or similar committess, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.*

The RTS Citizen's Advisory Board (CAB) is appointed by the Gainesville City Commission, and therefore does not apply to this criterion.

9 Title VI Equity Analysis

> *FTA Circular 4702.1B, Chapter III, Paragraph 4.a.8: If the recipient has constructed a facility, such as vehicle storage, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.*

Title 49 CFR, Appendix C, Section (3)(iv) requires that "the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. In order to comply with the regulations, RTS will ensure the following:

1. RTS will complete a Title VI equity analysis for any facility during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. RTS will engage in outreach to persons potentially impacted by the siting of the facility. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

2. When evaluating locations of facilities, RTS will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.

3. If RTS determines that the location of the project will result in a disparate impact on the basis of race, color, or national origin, RTS may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. RTS must demonstrate and document how both tests are met. RTS will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

RTS moved to its new maintenance and operations facility in November 2014. The Title VI Equity Analysis report for this facility was submitted with the last Plan. RTS does not have any Title VI Equity Analysis reports to submit with this Plan.

10   System-Wide Service Standards and Service Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

RTS is a fixed route service provider. FTA Circular 4702.1B requires that all fixed route service providers prepare and submit system-wide service standards and service policies as a part of their Title VI Plan. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

RTS has adopted the system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin (Appendix J). Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

11   Appendices

APPENDIX A   FTA CIRCULAR 4702.1B REPORTING REQUIREMENTS FOR TRANSIT PROVIDERS
APPENDIX B   CURRENT SYSTEM DESCRIPTION
APPENDIX C   TITLE VI PLAN ADOPTION MEETING MINUTES AND FDOT CONCURRENCE LETTER
APPENDIX D   TITLE VI SAMPLE NOTICE TO PUBLIC
APPENDIX E   TITLE VI COMPLAINT FORM
APPENDIX F   PUBLIC PARTICIPATION PLAN
APPENDIX G   LANGUAGE ASSISTANCE PLAN
APPENDIX H   OPERATING AREA LANGUAGE DATA: RTS SERVICE AREA
APPENDIX I   TITLE VI EQUITY ANALYSIS
APPENDIX J   RTS SYSTEM-WIDE SERVICE STANDARS AND POLICIES

Appendix A

FTA Circular 4702.1B Reporting Requirements for Transit Providers

Every three years, on a date determined by FTA, each recipient is required to submit the following information to the Federal Transit Administration (FTA) as part of their Title VI Program. Sub-recipients shall submit the information below to their primary recipient (the entity from whom the sub-recipient receives funds directly), on a schedule to be determined by the primary recipient.

General Requirements

All recipients must submit:

- ☐ Title VI Notice to the Public, including a list of locations where the notice is posted
- ☐ Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- ☐ Title VI Complaint Form
- ☐ List of transit-related Title VI investigations, complaints, and lawsuits
- ☐ Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- ☐ Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- ☐ A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- ☐ Primary recipients shall include a description of how the agency monitors its sub-recipients for compliance with Title VI, and a schedule of sub-recipient Title VI Program submissions
- ☐ A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- ☐ A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOTs, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- ☐ Additional information as specified in Chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity (see below)

Requirements of Transit Providers

All Fixed Route Transit Providers must submit:

- ☐ All requirements set out in Chapter III (General Requirements)
- ☐ Service standards
  - o Vehicle load for each mode
  - o Vehicle headway for each mode
  - o On time performance for each mode
  - o Service availability for each mode
- ☐ Service policies
  - o Transit Amenities for each mode
  - o Vehicle Assignment for each mode

Appendix B

Current System Description

Current System Description

1. <u>RTS public transit mission.</u>
   RTS's mission as a transportation provider is to enhance the quality of life in our community by providing safe, courteous, equitable, reliable and energy-efficient transportation services.

2. <u>Organizational structure, type of operation, number of employees service hours, staffing plan and safety and security plan.</u>
   Our organization is made up of 298 full-time employees, 3 part time interns, and 1 volunteer. Our Transit Director is responsible for all of the day-to-day operations of our organization and reports directly to the City Manager for the City Of Gainesville. Transportation services are provided in accordance with the RTS System Safety and Security Program Plan (updated in 2015) and its Transportation Disadvantaged Service Plan (TDSP). Our agency staffing plan is outlined in our 2014 Transit Development Plan (page 158). We will continue to operate at previous year (2015) service hours averaging 841.50 total fleet service hours per day or approximately 302,943 annual service hours (assuming 363 operating days).

3. <u>Indicate if your agency is a government authority or a private non-profit agency.</u>
   RTS operates as a department of the City Of Gainesville, a Florida municipal corporation. RTS contracts with MV Contract Transportation, which is a for profit company, to provide ADA complementary paratransit. MV Transportation has been designated as the Community Transportation Coordinator (CTC) by the State of Florida. We have an executed CTC agreement dated Oct 2, 2014.

4. <u>Who is responsible for insurance, training and management, and administration of the agency's transportation programs?</u>
   RTS's director is responsible for training and management of our transportation program All safety sensitive employees are required to complete six to eight weeks of training on initial hiring and 40 hours of training while in service annually. All new employees are also required to complete 80 hours of on-the-road drivers training, which includes riding with a training driver, behind-the-wheel training, and training on proper use of wheel chair lifts and securement devices. The City of Gainesville's Risk Management Department is responsible for annual renewal of all liability insurance for both FDOT and agency owned vehicles, as well as vehicle registration renewal. It is the Transit Director's responsibility to administer all aspects of the transportation program and to control access and usage of all agency vehicles.

5. <u>Who provides vehicle maintenance and record keeping?</u>
   RTS employs only technicians qualified per (14-90 009) with experience in working on commercial passenger vehicles like the type our agency uses. All maintenance is performed using the Bus Transit System Safety Program Plan, which conforms to the State Vehicle Maintenance Guidelines set forth in the FDOT Preventative Maintenance Guidelines document. All vehicle files and driver files are kept on-site at our operations base located at 34 SE 13 Road, Gainesville, Florida 32601 and are

maintained by the Maintenance Manager. RTS retains records electronically for the life of the equipment and five (5) years for the hard copies.

6. <u>Number of current transportation related employees</u>
RTS has a total of 298 employees that include: 210 full-time drivers, 8 administrators and 80 support staff.

7. <u>Who will drive the vehicle, number of drivers, CDL certifications, etc.?</u>
Only transportation employees that have completed all of the required safety and drivers training requirements will be allowed to drive the agency vehicles. All our drivers are required to carry a Commercial Driver's License.

8. <u>A detailed description of service routes and ridership numbers</u>
Our service incorporates fixed-route bus routes connecting the City of Gainesville, the University Of Florida (UF), Santa Fe College (SF), and some unincorporated parts of Alachua County. In addition to the fixed-route services, RTS contracts with a for-profit company to provide paratransit service. We provide a wide range of trip purposes that include: medical, nutrition, shopping, social service, training, employment, social and recreation. We primarily use 40' buses on the fixed-route to provide passenger services. Our fleet also includes cutaway vans used for paratransit services, and a variety of support vehicles. All of our service vehicles are equipped for wheelchair service. On an average day, we make over 40,000 fixed-route passenger trips and over 1,700 paratransit passenger trips. We leverage our fleet resources so that all vehicles are used in a responsible manner to provide full coverage and retire vehicles at a consistent pace and appropriate age and mileage.

RTS's service area covers over 80 square miles, which encompasses the Gainesville metropolitan area and portions of unincorporated Alachua County. Ridership is monitored carefully and routes are assessed for serviceability to the riders, frequency of overcrowding or underutilization of routes, and RTS modifies routes based on ridership needs. In partnership with local and regional planning agencies, routes and levels of service are also adjusted based on development in order to address new service areas. In FY15 RTS provided service on 48 fixed routes. FY15 performance measures indicate a total of 10,251,248 passenger trips on fixed route buses utilizing a fleet of 107 buses in peak service. RTS's ADA complementary, non-fixed route paratransit service provides door-to-door service to anyone who is paratransit-certified on an appointment basis. Meeting the community's needs with paratransit service is critical to RTS's mission in delivering transportation services to all who need transit mobility. FY15 performance measures document a total ridership of 50,971 passenger trips on non-fixed routes, utilizing a fleet of 35 paratransit vans.

Appendix C

Title VI Plan Adoption Meeting Minutes and FDOT Concurrence Letter

The 2016 approval will be updated as soon as they are available. The 2013 approvals are below.

City Commission	Minutes	August 1, 2013

This is the submission of petition for voluntary annexation of city-owned property that is a portion of Tax Parcel 16146-000-000, which is located south of Fred Cone Park on Southeast Hawthorne Road and in the vicinity of Southeast 27th Street.

RECOMMENDATION   *The City Commission: 1) authorize the Mayor, as agent for the City, to sign the petition for voluntary annexation; 2) receive the petition for annexation and make findings that it contains the signature of the property owner or authorized agent; 3) direct the City Manager to analyze the area; and 4) authorize the City Attorney to prepare and the Clerk of the Commission to advertise ordinances relating to the annexation of the area, if appropriate.*

130121.   **Annexation of City-owned Parcels Northeast of Gainesville Regional Utilities Deerhaven Generating Station (B)**

This is the submission of petitions for voluntary annexation of city-owned property composed of Tax Parcels 05871-003-000 and 05871-002-000, both of which are located northeast of Gainesville Regional Utilities Deerhaven Generating Station along State Road 121.

RECOMMENDATION   *The City Commission: 1) authorize the Mayor, as agent for the City, to sign the petition for voluntary annexation; 2) receive the petition for annexation and make findings that it contains the signature of the property owner or authorized agent; 3) direct the City Manager to analyze the area; and 4) authorize the City Attorney to prepare and the Clerk of the Commission to advertise ordinances relating to the annexation of the area, if appropriate.*

130203   **Authorization to draft amendments to the General Employees' Pension Plan and the Police Officers and Firefighters Consolidated Retirement Plan (NB)**

RECOMMENDATION   *The City Commission authorize the City Attorney to draft and the Clerk of the Commission to advertise the proposed amendments to the General Employees' Pension Plan and the Police Officers and Firefighters Consolidated Retirement Plan.*

130124.   **Approval of the Regional Transit System (RTS) Title VI Program (B)**

This item is a request to approve the RTS Title VI Program and its subsequent submission to the Federal Transit Administration (FTA) for final review and approval.

RECOMMENDATION   *The City Commission approve the Regional Transit System (RTS) Title VI program.*

City of Gainesville   *Page 2*

Alternative Recommendation
The City Commission continue to work with the City of
Gainesville Equal Opportunity Office for an acceptable
alternative program.
<mark>Approved as Recommended</mark>

130133.   **Service Agreement for an Open Data Portal and Performance**
Measurement Dashboard for the Government 2.0 Initiative (NB)

This item requests approval by the City Commission to authorize the City
Manager to enter into a specified source contract with Socrata, Inc., for
The Socrata Open Data Platform™ and GovStat™ to make data
available through shared public datasets and display performance
metrics using interactive dashboards.

Heard on Regular Agenda.Fred Murry and Becky Rountree made presentations.

Jo Beaty, Nathan Skop, Gabe Kaimowitz, Mac McEachern, Donald Sheppard and
Mark Venske spoke to the matter.

RECOMMENDATION   *The City Commission: 1) approve Socrata, Inc., to be a*
specified source for The Socrata Open Data Platform™ and
GovStat™; and 2) authorize the City Manager, or his
designee, to negotiate and execute a three-year service
agreement with Socrata, Inc., subject to the approval of the
City Attorney as to form and legality.

Approved as Recommended

Aye: 5 -   Commissioner Bottcher, Commissioner Poe, Commissioner Hawkins,
Mayor-Commissioner Pro Tem Wells, and Commissioner Hinson-Rawls

Nay: 1 -   Mayor Braddy

Absent: 1 -   Commissioner Chase

130143.   **Scheduling of a Compensation Study Workshop (NB)**

RECOMMENDATION   *The City Commission approve a workshop to discuss the*
Compensation Study on August 29, 2013, from 2:00 pm to
4:00 pm in City Hall, Room 16.

Approved as Recommended

GENERAL MANAGER FOR UTILITIES, CONSENT AGENDA ITEMS

130150.   **General Engineering and Consultation Services (NB)**

Staff recommends authorization to negotiate amendments to contracts for
professional engineering and consulting services.

RECOMMENDATION   *The City Commission: 1) authorize the General Manager, or*
his designee, to negotiate and execute amendments to the
contracts for professional engineering and consulting firms

U.S. Department
Of Transportation

Region IV

230 Peachtree Street, N.W.
Suite 800
Atlanta, GA 30303

**Federal Transit
Administration**

October 29, 2013

Matthew R. Muller
RTS Chief Transit Planner
Gainesville Regional Transit System (RTS)
100 SE 10th Avenue
Gainesville, FL 32601

Re: Title VI Program Concurrence – Recipient ID No. 1084

Dear Mr. Muller:

This letter is to confirm that we received the Gainesville Regional Transit System's Title VI Program on August 22, 2013. This Title VI Program submission is required pursuant to Title VI of the Civil Rights Act of 1964; Title 49, Chapter 53, Section 5332 of the United States Code; and the Federal Transit Administration's (FTA) Circular 4702.1B, "Title VI Program Guidelines for Federal Transit Administration Recipients," effective October 1, 2012.

We have reviewed your program and determined that it meets the requirements set out in the FTA's Title VI Circular 4702.1B. Please plan to submit a Title VI Program by October 1, 2016 by attaching it to your Recipient Profile in FTA's TEAM-Web. Please delete any version of the program in TEAM that this submission is replacing. Your Title VI Program will expire 60 days after the due date, on November 30, 2016. If we have not received required information by the time your Title VI Program expires, the Gainesville RTS may experience delays in processing grants or draw-down restrictions.

Thank you for your ongoing cooperation in meeting all of the FTA civil rights program requirements. A copy of this letter has been attached to your Recipient Profile in TEAM. Please contact me at (404) 865-5471 or at Carlos.Gonzalez3@dot.gov for any questions.

Sincerely,

Carlos A. Gonzalez
Regional Civil Rights Officer

cc: Jesus Gomez, Transit Director, Gainesville RTS (Electronic)
      Dr. Yvette G. Taylor, Regional Administrator, FTA Region IV (Electronic)
      Monica McCallum, Regional Division Chief, FTA Civil Rights (Electronic)

Appendix D

RTS Title VI Notice to Public

Title VI Notice to Public - English Version
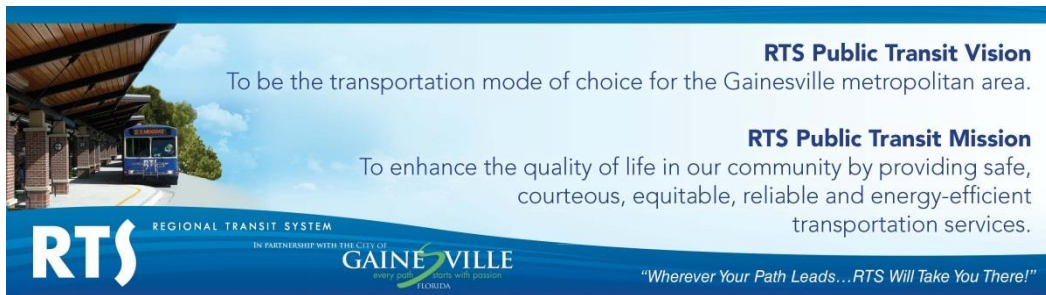
1   Gainesville Regional Transit System (RTS) Title VI Notice to the Public

RTS operates its transit services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, as amended.

2   RTS Title VI Statement

Title VI of the Civil Rights Act of 1964 states:

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

RTS is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

3   Requesting Additional Information and/or Making a Title VI Complaint

Any person who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Act of 1964, its amendments and related statutes, by the Gainesville Regional Transit System (RTS) in its role of planning and programming of federal funds, may submit a written complaint. Any such complaint must be in writing and filed with the Office of Equal Opportunity within 180 days following the date of the alleged discriminatory occurrence. For more information on RTS's civil rights program, and obtaining Title VI Discrimination Complaint Forms from the Office of Equal Opportunity, use any of the following methods provided below:

- **Internet**

Download the Title VI Complaint Form or Title VI Complaint Procedure: http://www.go-rts.com/feedback.php#titlevi

- **Mailing Address**

Send a letter to the Office of Equal Opportunity to request a Title VI Complaint Form:

City of Gainesville, Office of Equal Opportunity
PO Box 490, Mail Station 52
Gainesville, FL 32602

- **Telephone**

Contact the Office of Equal Opportunity by phone to request a Title VI Complaint Form: (352) 334-5051

- **Email:**

Send an email to the Office of Equal Opportunity to request a Title VI Complaint Form:
equalopportunity@cityofgainesville.org

Title VI Notice to Public - Spanish Version

1 Titulo VI Aviso al Publico del Sistema de Transito Regional de Gainesville

RTS opera sus servicios de transito sin tomar en cuenta raza, color, o nacionalidad de acuerdo con la sección Titulo VI de la Ley de Derechos Civiles de 1964 y sus enmiendas.

2 RTS Titulo VI Declaración

La sección Titulo VI de la Ley de Derechos Civiles dice:

"Ninguna persona en los Estado Unidos será, por motivos de raza, color o nacionalidad, excluida de participar, negada beneficios o ser sometida a actos de discriminación en los programas o actividades que reciben asistencia financiera federal."

RTS promete cumplir con los requerimientos de Titulo VI en todos sus programas financiados con dinero federal.

3 Realizando una Queja de Titulo VI

Cualquier persona que cree que ha sido, o que un grupo de personas específicas han sido, víctimas de discriminación que es prohibida por la Ley de Derechos Civiles de 1964 puede presentar una queja escrita. Dicha queja debe de ser presentada por escrito e archivada con la Oficina de Igualdad de Oportunidades (Office of Equal Opportunity) dentro de 180 días después del acontecimiento de la supuesta discriminación.

- **Internet:**

La Forma de Quejas de Titulo VI o el Procedimiento de Quejas de Titulo VI pueden ser encontrados en: http://www.go-rts.com/feedback.php#titlevi

- **Dirección de correo:**

City of Gainesville, Office of Equal Opportunity

PO Box 490, Mail Station 52

Gainesville, FL 32602

- **Teléfono:**

Para pedir una Forma de Quejas de Titulo VI llame al (352) 334-5051

- **Email:**

Para mandar un email a la Oficina de Igualdad de Oportunidades para pedir una Forma de Quejas de Titulo VI, envíe su mensaje a equalopportunity@cityofgainesville.org.

Title VI Notice to Public - Chinese Version

1 甘城公共交通系统(RTS)关于民权法案第六章对公众的通告

甘城公共交通系统(RTS)为甘城人们提供公共交通服务，不分种族，肤色，宗教，性别，性取向，国籍，婚姻状况，年龄或残疾， 与 1964 年民权法案及其修正案保持一致。

2 RTS 民权法案第六章

1964 年民权法案声明：

"在美国，任何人都不得被禁止参与接受联邦资助的活动和项目， 或者被禁止享受由联邦资助项目所带来的好处， 或者在联邦资助项目中受到歧视基于其种族，肤色或民族等原因。"

甘城公共交通系统(RTS) 致力于在其所有的联邦资助项目和活动中遵守该条款。

3 针对民权法案第六章进行投诉

任何人，如果觉得自己或者某一类人在甘城公共交通系统(RTS)规划与使用联邦财政的过程中受到了为 1964 年民权法案及其相关修正案所禁止的歧视， 都可以提交书面投诉。任何书面投诉必须在歧视事件发生后的 180 天内写好并提交至在甘城平等机会办公室。民权法案第六章歧视投诉表单可以从下面提供的方法中获取：

- **网络下载地址:**

http://www.go-rts.com/feedback.php#titlevi

- **邮寄联系方式：**

City of Gainesville, Office of Equal Opportunity
PO Box 490, Mail Station 52
Gainesville, FL 32602

- **电话联系方式：**

(352) 334-5051

- **电子邮件（email）联系方式：**

equalopportunity@cityofgainesville.org

Appendix E

Title VI Complaint Form

RTS

Title VI Complaint Form

RTS is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please contact the Office of Equal Opportunity by calling (352) 334-5051. Complete and return this form to the City of Gainesville Office of Equal Opportunity: 222 E. University Avenue, Gainesville, FL 32602.

1. Complainant's Name _____

2. Address_____

3. City, State and Zip Code_____

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

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

    Name_____

    Address_____

    City, State and Zip Code_____

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:
a. Race_____
b. Color_____
b. National Origin (Limited English Proficiency) _____

7. What date did the alleged discrimination take place? _____

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.
_____
_____
_____

_____
_____
_____
_____
_____
_____
_____

9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? _____ Yes _____ No
If yes, check all that apply:
_____Federal agency _____ Federal court _____State agency _____State court
_____Local agency

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

Name_____

Address_____

City, State, and Zip Code _____

Telephone Number _____

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

_____   _____
Complainant's Signature   Date

_____
Print or Type Name of Complainant

Date Received: _____

Received By: _____

Appendix F

Public Participation Plan (PPP)

1 Introduction

Development of premier transit services depends on public outreach that engages local citizens, businesses, regional and corridor-wide governmental bodies, and interested groups. As such, the City of Gainesville Regional Transit System (RTS) prioritizes active, inclusive public involvement, and makes a concerted effort to include minority and Limited English Proficient (LEP) populations and other constituencies that are traditionally underserved during its planning and project development processes. More specifically, RTS recognizes its obligations under Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898, and the Florida Civil Rights Act of 1992, and is therefore committed to ensuring that no person shall, on the basis of race, color, national origin, marital status, handicap, sex, age, disability, family, income, or religious status, be excluded from participation in, be denied the benefits or services of, or be otherwise subjected to discrimination or retaliation under any RTS program or activity.[2]

To the greatest extent possible, RTS creates unique public involvement plans, tailored to the meet the individual needs of each project or activity rather than a single, monolithic document that attempts to cover all situations.[3] For that reason, the following public involvement plan simply summarizes strategies and efforts that RTS pulls from when developing these more definite plans. These public involvement plans are shaped in accordance with RTS's Transit Development Plan (TDP), which is mandated by Florida Administrative Code (F.A.C) Rule 14-73.001 and submitted to the Florida Department of Transportation (FDOT) on an annual basis. The RTS TDP outlines existing and future conditions, priorities and financial planning strategies, and public outreach approaches or policies. RTS's TDP was developed to be consistent with the Metropolitan Transportation Planning Organization (MTPO) for the Gainesville Urbanized Area's Public Participation Plan.

2 Public Participation Plan Techniques

The public involvement plan contains a variety of techniques to maximize the active participation by citizens or their representatives and to build trustworthiness between RTS and these individuals.[4] These

---

[2] Persons who require special accommodations under the Americans with Disabilities Act (ADA) or persons who require translation services to participate in public meeting activities are requested to notify RTS at least seven days prior to workshops or meetings. RTS public meeting notices include RTS contact information and a deadline date for requesting special accommodations. Refer specifically to Appendix F for efforts taken to engage and provide information to minorities and LEP populations.

[3] Considerations that go into deciding the type of plan developed include fiscal impact of the action and size of the action (stop-based versus service area based). For a recent example of a specific public involvement plan, please see the *City of Gainesville BRT/Bus Alternatives Analysis Public Involvement Plan* http://www.go-enhancerts.com/resources/GainesvilleBRTPIP01312013.pdf.

[4] This acknowledges that the purposes of individuals like elected officials are to summarize and represent the opinions of their constituency. This does not imply that RTS bypasses direct interaction with citizens. For example, while RTS frequently uses informational booths on the University of Florida campus to collect information from students it recognizes the value of speaking with UF officials who receive daily feedback regarding RTS services.

techniques are transparent and flexible and can be classified as direct involvement activities or information distribution activities. The former refers to engaging the public in "hands on" workshops and/or discussions about a project while the latter refers to the dissemination of public information materials.

- **Direct Participation Activities**

Direct participation activities used by RTS to obtain public feedback include the following:

2..1 Project Review Committees

Project review committees provide oversight and technical feedback during project development processes. Representatives may be selected from groups such as:

- RTS operators and administrators
- City of Gainesville and Alachua County staff and elected officials
- FDOT and MTPO

2..2 Stakeholder Interviews

Stakeholder interviews solicit ideas, concerns, and comments from organizations, community leaders, and other individuals identified by RTS. RTS typically conducts interviews in person or by phone, and follows brief questionnaires to assist the interview process. In addition to the representatives outlined above, stakeholder interviews may involve:

- Regional Workforce Board (FloridaWorks)
- University of Florida (UF) and Santa Fe College (SFC)
- UF Health Shands Hospital and Malcom Randall Veterans Administration Medical Center
- Alachua County Housing Authority
- Gainesville Chamber of Commerce
- Gainesville Community Redevelopment Agency
- Transportation Disadvantaged Board
- Builders Association of North Central Florida
- Alachua County School Board
- Elected officials from surrounding Communities
- Miscellaneous Community-based organizations, including those representing different ethnic and race-based groups.

2..3 Surveys and Feedback Forms

System-wide, statistically valid, on-board surveys of RTS fixed-route bus patrons provide information about passenger demographics, travel behavior, satisfaction, needs, and issues. On-board surveys

typically coincide with major updates to the TDP, Comprehensive Operational Analyses, and National Transit Database ridership surveys. These events range in frequency from every three to five years.[5]

RTS also effectively uses non-statistically valid surveys to gather the opinions, ideas, or needs of operators and the community. Some examples include the use of surveys to identify the languages operators speak, and preferred alignments and amenities for possible premium transit services. Social media sites, like Facebook, are also introducing a whole new range of opportunities for impromptu, informal surveys to gather immediate feedback.[6]

2..4   **Public Workshops and Open Houses**

Public workshops and Open Houses are recognized as effective techniques for obtaining substantive public participation during the planning process and are the primary mechanism for soliciting public input regarding the transit needs of the RTS service area. Public workshop locations are distributed across the RTS service area to ensure substantial spatial coverage and are identified based upon their presence near high frequency transit routes, ability to accommodate the physically disabled, and well-known status in the area.[7] At these workshops, attendance sheets are provided so individuals who want to stay involved are able to provide their contact information for future outreach and provide comments in case they are uncomfortable speaking in front of a group.

Public workshops employ one or more public participation techniques, with the type of strategy employed depending upon the workshop topic and venue:

- Presentations
- Surveys
- Dot polling
- Visual displays

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[5] The most recent, major TDP update provided surveys in both English and Spanish. Future efforts will provide all surveys of this nature in English, Spanish, and Chinese.

[6] In addition to Facebook, the RTS website, project websites like those developed for the Premium Transit Alternatives Analysis, and the TransLoc Automatic Vehicle Location (AVL) interface all allow for customer feedback. These feedback forms are available on each bus, as well and can be filled out directly by a passenger or with the assistance of a driver. RTS maintains the information it receives in a Microsoft Office Access database where it can quickly query input by route, stop, time of day, day, and a host of other variables. RTS looks to this information when planning service changes or making other service recommendations.

[7] RTS most frequently hosts its meetings at City Hall (200 East University Avenue, Gainesville, FL 32601), Gainesville Regional Utility Multi-purpose Room (301 Southeast 4th Avenue, Gainesville, FL 32601), or RTS Administration (34 SE 13th Road, Gainesville, FL 32601). All facilities are within or adjacent to Census Block Groups that are identified by the most recent American Community Survey or United States Census as having above average levels of individuals and households without a vehicle, designated as below poverty, designated as a LEP individual or minority, and a non-high school graduates. It is important to note, however, that this information also shows that these groups are distributed throughout the RTS service area rather than being geographically isolated.

- Question and answer sessions
- Discussion groups

RTS seeks to vary the time of day when it hosts these meetings so as to accommodate the different work schedules of individuals within the community.

2..5 Public Presentations

RTS also regularly engages with the community at monthly or bimonthly meetings for:[8]

- Alachua County Board of County Commissioners
- City of Gainesville City Commission
- RTS Citizens Advisory Board (CAB)
- MTPO Board, Technical Advisory Committee, and Citizens Advisory Committee

3   Information Distribution Activities

RTS shares information with the public in a variety of ways in order to increase the number of unique groups it reaches and tailors the information to the specific event. For example, with semester schedule changes, a matrix is created showing each route and the proposed action. RTS uses the following methods to distribute information to the public regarding projects, activities, events, and meetings:

- RTS website
- Information booths[9]
- RTS Facebook and YouTube accounts
- Phone-based language interpretation[10]
- City and County websites
- Newspapers, including the Gainesville Sun and Gainesville Guardian[11]
- Florida Administrative Register
- RTS and City facilities, including City Hall, all RTS buses, primary bus stops or transfer locations[12]
- Email distribution lists[13]

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[8] RTS Marketing maintains a checklist of required items and actions for all events/meetings, including sign-up sheets, cameras, pencils/pens, schedules, and ridership and bus stop information.

[9] See Appendix E for the wide range of locations where RTS interacts with the public through presentations and informational booths, including local fairs, festivals, and schools.

[10] RTS contracts with Language Line to provide phone translation services in over 200 languages.

[11] All RTS public workshops are advertised at least one week in advance in these newspapers.

[12] On a weekly basis, volunteers provide transit service support for the visually impaired at RTS's Rosa Parks Downtown station.

- Gainesville Public Television Channel-12

4 Measures of Effectiveness

To ensure accountability and improvement, RTS sets specific, numeric initiatives regarding public outreach and customer satisfaction within its TDP and annually reports on its success in meeting these initiatives.[14] Examples include:

- Participating in a certain number of local job fairs, community organization meetings and events
- Distributing service information to all businesses, community facilities, and residences within a certain distance of RTS routes

Reducing the number of customer complaints per 100,000 riders.

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[13] Email distribution lists are compiled from sign-in sheets and used to distribute project reports, surveys, future meeting dates and times.

[14] Most of these initiatives seek to go beyond the obligatory requirements to host public workshops notifying citizens or service and fare changes.

Appendix G

Language Assistance Plan (LAP)

5 Introduction

Title VI of the Civil Rights Act of 1964, and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. A federal aid recipient's failure to assure that people who are not proficient in English can effectively participate in and benefit from programs and activities may constitute national origin discrimination prohibited by Title VI.

Figure 1. Google Trip Planner (Chinese)

In accordance with the above, Executive Order 13166, and the Federal Transit Administration (FTA) Circular 4702.1B, the City of Gainesville Regional Transit System (RTS) has developed a plan concerning Limited English Proficient (LEP) persons. This plan illustrates the various forms of contact that RTS has with LEP persons, and how it uses that information to improve access to services and transportation decision-making processes for LEP persons. This is not a static document. RTS will continue to modify its LEP program based upon feedback and direction received from RTS employees and community members.

- **System Background**

The City of Gainesville Regional Transit System (RTS) provides fixed-route bus service and contracted complementary paratransit services connecting the City of Gainesville, the University of Florida (UF), Santa Fe College (SFC), and unincorporated parts of Alachua County. During most weekdays in spring 2016, RTS operated 45 routes, covering an area of over 80 square miles. RTS serves over 10 million passengers per year. Figure 2 shows the RTS service area.

Figure 2: RTS Weekday Routes and Service Area Map
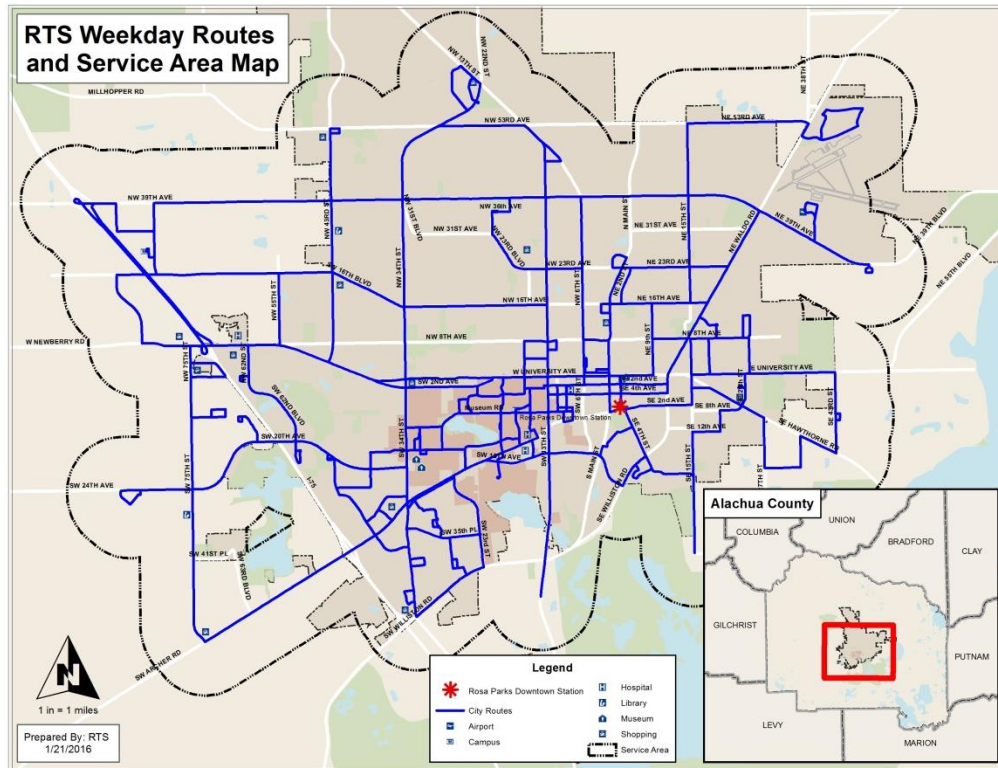
- ## Description of the Study Area

The City of Gainesville is located within Alachua County in North Central Florida. Alachua County is bordered on the north by Columbia, Union, and Bradford Counties, on the east by Putnam County, on the west by Gilchrist County, and on the south by Levy and Marion counties. The City of Gainesville is approximately 63 square miles while Alachua County is approximately 969 square miles.

Figure 3: Google Trip Planner (Spanish)
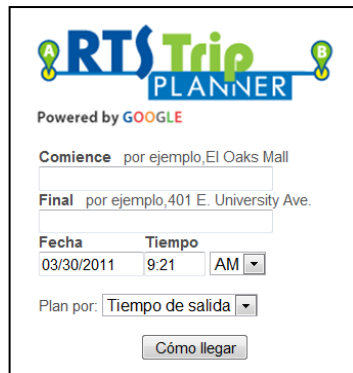
Over the last ten years, both the populations of Alachua County and the City of Gainesville have increased. Between 2015 and 2025, the Bureau of Economic and Business Research (BEBR) projects that the population of Alachua County will grow from approximately 254,893 to 278,133, an increase of over 9 percent[15].

- ## Limited English Proficiency Program Background

Individuals that have a limited ability to read, write, speak, or understand English are considered LEP. According to the 2009-2013 American Community Survey 5-Year Estimates (S1602), more than 5 million households in the United States report that *no one over age 14 speaks English only or speaks English*

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[15] "Population Studies Program." *BEBR Home*. N.p., 29 Jan. 2016. Web. 15 Sept. 2016.

"very well." Among these households, the largest language groups include Asian and Pacific Islander languages and Spanish.

6   Four Factor Analysis

- **Factor 1: The Number and Proportion of LEP Persons Eligible to be Served or Likely to be Encountered by the Program or Recipient**

6..1   Language Abilities

Almost 3.44% of the Alachua County population age 5-years and over, or 8,174 persons, speaks English less than "very well", according to the 2010-2014 American Community Survey 5-year estimates (Table 1). This figure for the RTS service area alone is slightly higher at 4.00% of the population; of the LEP persons in Alachua County 72.95% reside in the RTS service area. The highest concentrations of LEP persons, as identified by those Census Tracts whose average population share of LEP individuals exceeds the average population share for the RTS service area, are found largely in the vicinity of SFC and UF in southwestern and northwestern portions of the RTS service area (Figure 4). Out of the total LEP population in Alachua County, Spanish or Spanish Creole, Chinese, and Korean represent the largest language shares.

Figure 4: Limited English Proficiency (All Languages) by Census Tract

All Languages: Speak English Less than "Very Well"

1 in = 2 miles

Limited English Proficiency: All Languages

At or Below RTS Service Area Average (<=4.00%)

Above RTS Service Area Average (>4.00%)

RTS_routes

RTS Service Area

City Limits

1 in = 18 miles

Source: U.S. Census Bureau. 2010-2014 American Community Survey. B16001.
Language Spoken at Home by Ability to Speak English for the Population 5 Year and Over

Table 1: Alachua County: Language Spoken at Home by Ability to Speak English for the Population 5 years and over

Language	Speak English less than "Very Well"
Spanish or Spanish Creole	2,963
French	99
French Creole	170
Italian	12
Portuguese or Portuguese Creole	167
German	134
Yiddish	0
Other Western Germanic languages	0
Scandinavian languages	0
Greek	0
Russian	159
Polish	107
Serbo-Croation	27
Other Slavic Languages	28
Armenian	0
Persian	62
Gujarati	197
Hindi	121
Urdu	20
Other Indic languages	162
Other Indo-European languages	24
Chinese	1,041
Japanese	306
Korean	699
Mon-Khmer, Cambodian	50
Hmong	0
Thai	101
Laotian	0
Vietnamese	603
Other Asian languages	248
Tagalog	258
Other Pacific Island languages	16
Navajo	0
Other Native North American	0
Hungarian	0
Arabic	213
Hebrew	12
African Languages	164
Other and unspecified languages	11

According to the table above, Alachua County has a Spanish-speaking LEP population of 2,963 persons, or approximately 1.25% of the total county population age 5 years and over. According to the same data 72.26% of these individuals live within the RTS service area. This Hispanic LEP population is spread throughout the RTS service area, with the highest concentrations (above the service area average of 1.44%) on the northern, southern, and western periphery (Figure 5).

Figure 5: Spanish-speaking Population by Census Tract
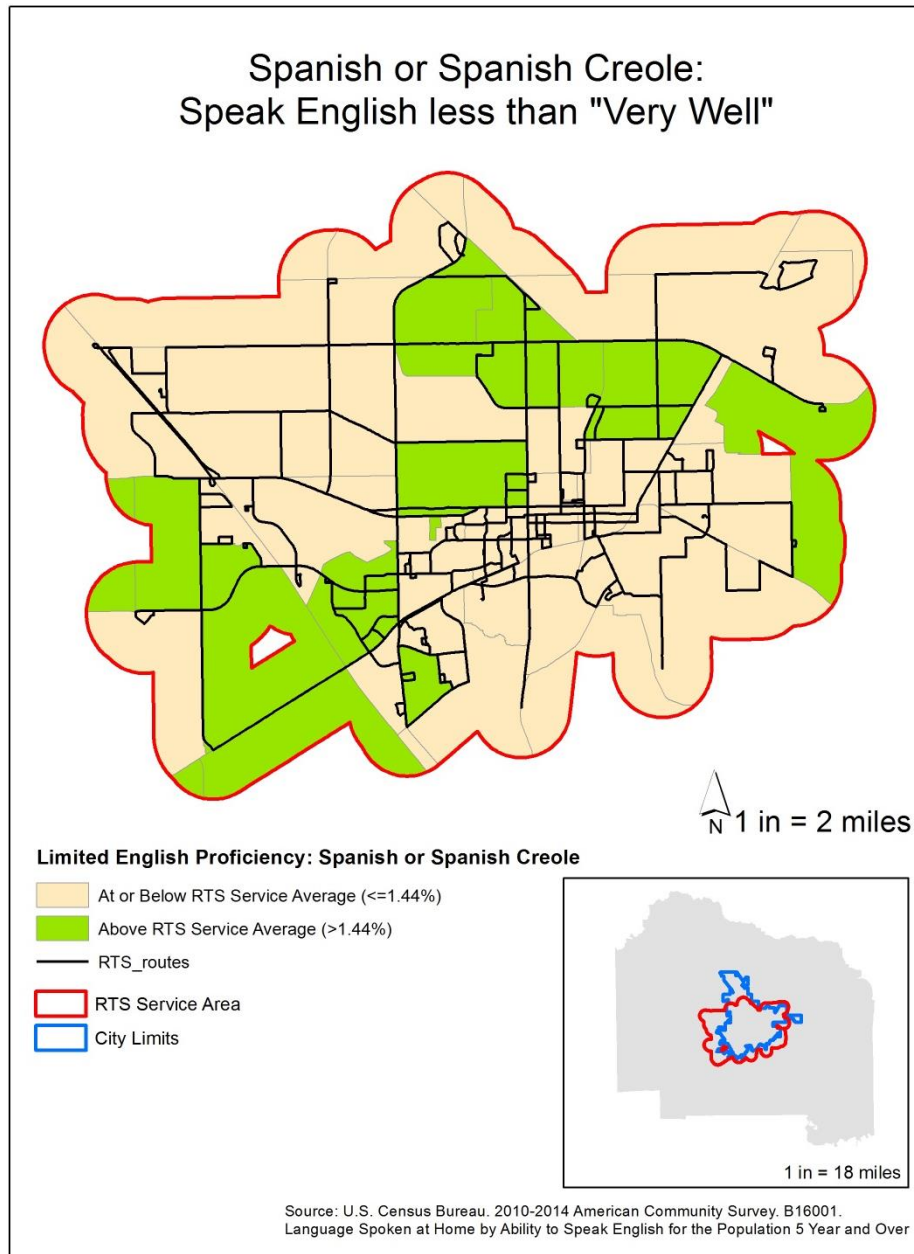
The Chinese-speaking LEP population is the only other language group within Alachua County with over 1,000 individuals who identify themselves as speaking English less than "very well." This group includes 1,041 persons, or approximately 0.44% of the total county population age 5 years and over; 94.24% of

these individuals reside in the RTS service area. The Chinese LEP population is primarily located around UF and on the northern periphery (Figure 6).

Figure 6: **Chinese-speaking Population by Census Tract**
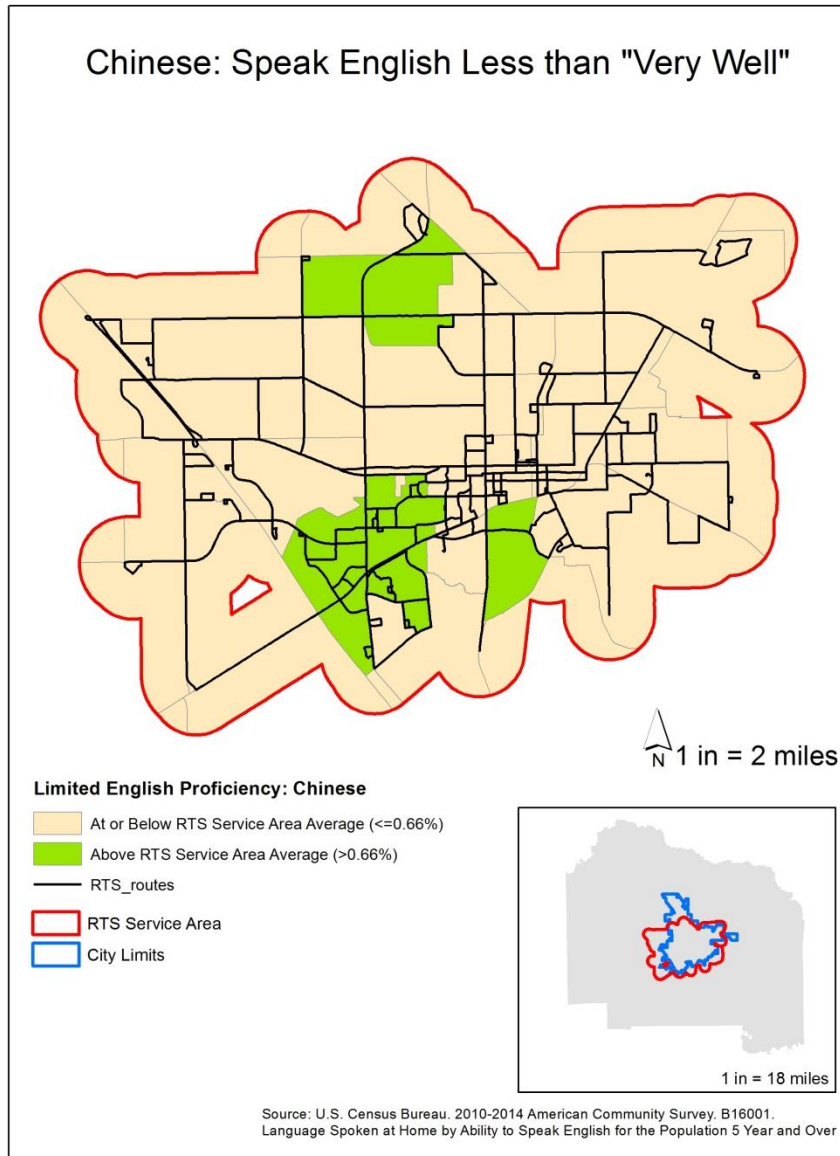
The above figures largely coincide with those from the University of Florida Office of Institutional Planning and Research. In fall 2014, there are 6,487 foreign students at UF. Out of these, 69.48% come from countries where the official language is something other than English. The table below illustrates the top five languages spoken by foreign students at UF (Table 2).

Table 2: University of Florida Top Languages of Foreign Students (Fall 2014)

Language of Country	Total Students
Chinese	1,697
Spanish	853
Korean	277
Arabic	202
French	173

6..2   Literacy Abilities

Another form of limited English proficiency is illiteracy. According to LEP guidelines, there is an association between limited English proficiency, low-income, and low-literacy. According to the 2010-2014 American Community Survey, approximately 8.17% of Alachua County residents 25 years and over and 8.53% of residents 25 years and over in the RTS service area did not graduate high school (Figure 7). This population is spread throughout the service area, but the highest concentrations (above the service area average of 8.53%) are located in the east.

Figure 7: Non-High School Graduates by Census Block Group
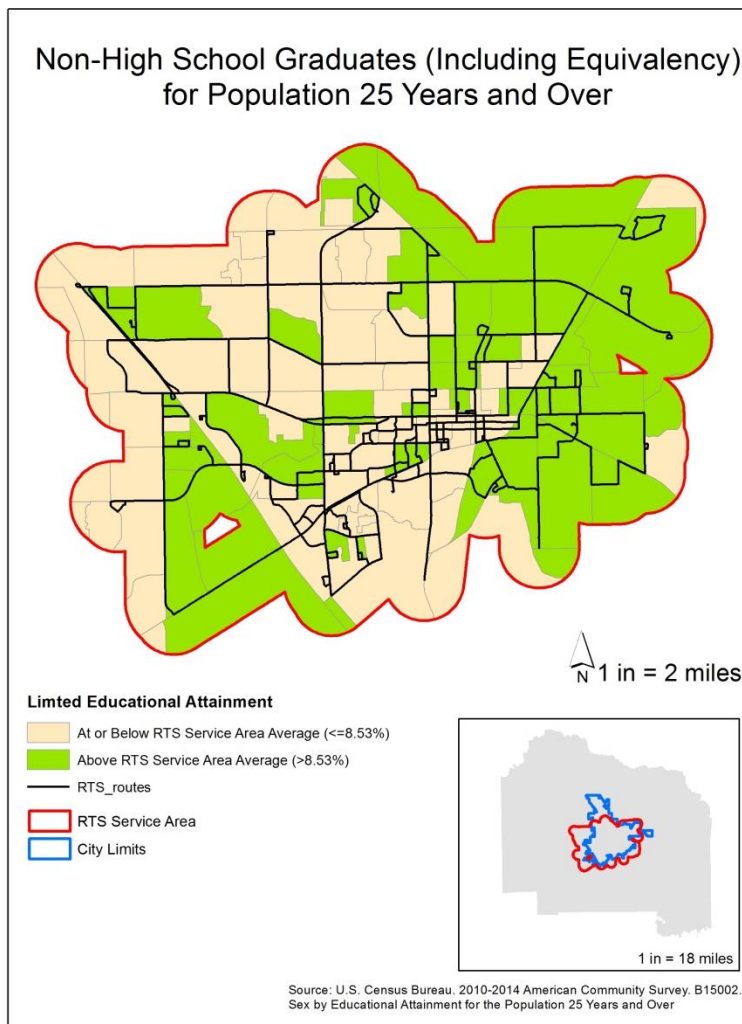
Additionally, the most recent National Assessment of Adult Literacy (NAAL) in 2003 found that 43% of the United States population was considered to have basic or below basic prose literary skills, meaning they could only perform simple and everyday literacy activities or they did not know more than the most simple and concrete literacy skills. The 2003 NAAL found that in Alachua County, 11% of the population lacks basic prose literacy skills, which is lower than surrounding counties and the state as a whole (Table 3).

Table 3: Estimate of Percent Lacking Basic Prose Literacy Skills in Florida

Location	Population size	Percent lacking basic prose literacy skills
Florida	13,040,318	20%
Alachua County	169,977	11%
Bradford County	18,178	17%
Columbia County	44,223	15%
Gilchrist County	11,152	14%
Levy County	28,113	16%
Marion County	219,916	14%
Putnam County	54,438	18%
Union County	7,827	17%

6..3   Income

Approximately 22.90% of Alachua County households live below the poverty level, while 28.19% of households residing in the RTS service area do (Figure 8).[16] This population is most heavily concentrated (above the service area average of 28.19%) in the central and eastern portions of the study area.

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[16] Poverty thresholds used by the U.S. Census vary according to family size and ages of the members.

Figure 8: Alachua County Households below Poverty by Census Block Group
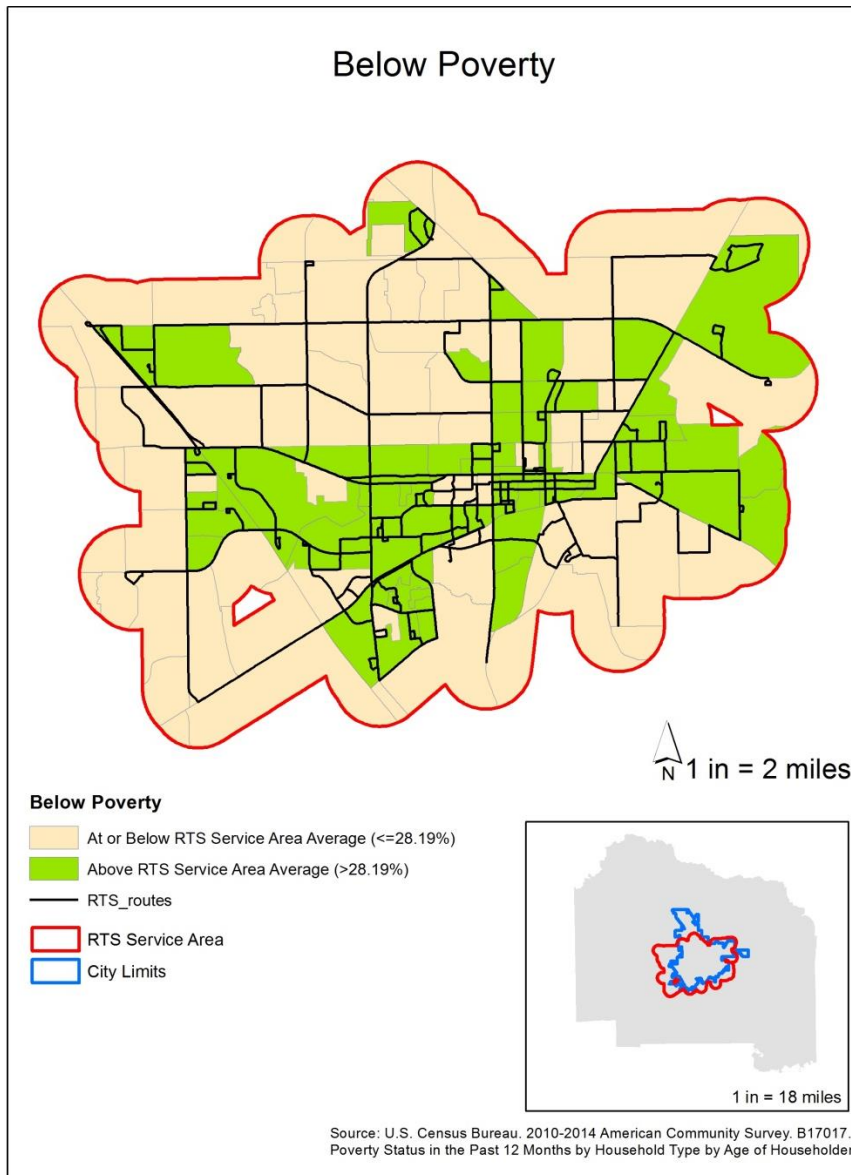
Because of the skewing influence that the area's large population of college students has on poverty figures, RTS also reviewed the number of students who are eligible for free or reduced priced lunch. In school year 2014-2015, 49.6% of Alachua County public school students received free of reduced priced lunch, which is less than the statewide average of 59.6%, and comparable or slightly lower than surrounding counties.

This same data from the Florida Department of Education revealed, however, that only 2.0% of Alachua County public school students speak a primary language other than English, which, is significantly less than Florida's statewide average of 9.4%. Most students designated as English Language Learners attend J.J. Finley Elementary, Gainesville High School, and Westwood Middle, which are the designated English for Speakers of Other Languages (ESOL) sites for Alachua County.

6..4   **Vehicle Availability and Minority Status**

Though not directly correlated with LEP persons, Figure 9 show that there is a strong overlap between Census Tracts or Block Groups where there is an above average number of households that lack a vehicle and an above average number of households or individuals below poverty, lacking a high school diploma or equivalency, and LEP. Figure 10 shows that the same can be said where there are above average numbers of minority individuals.

Figure 9: Zero-Vehicle Households by Census Block Group
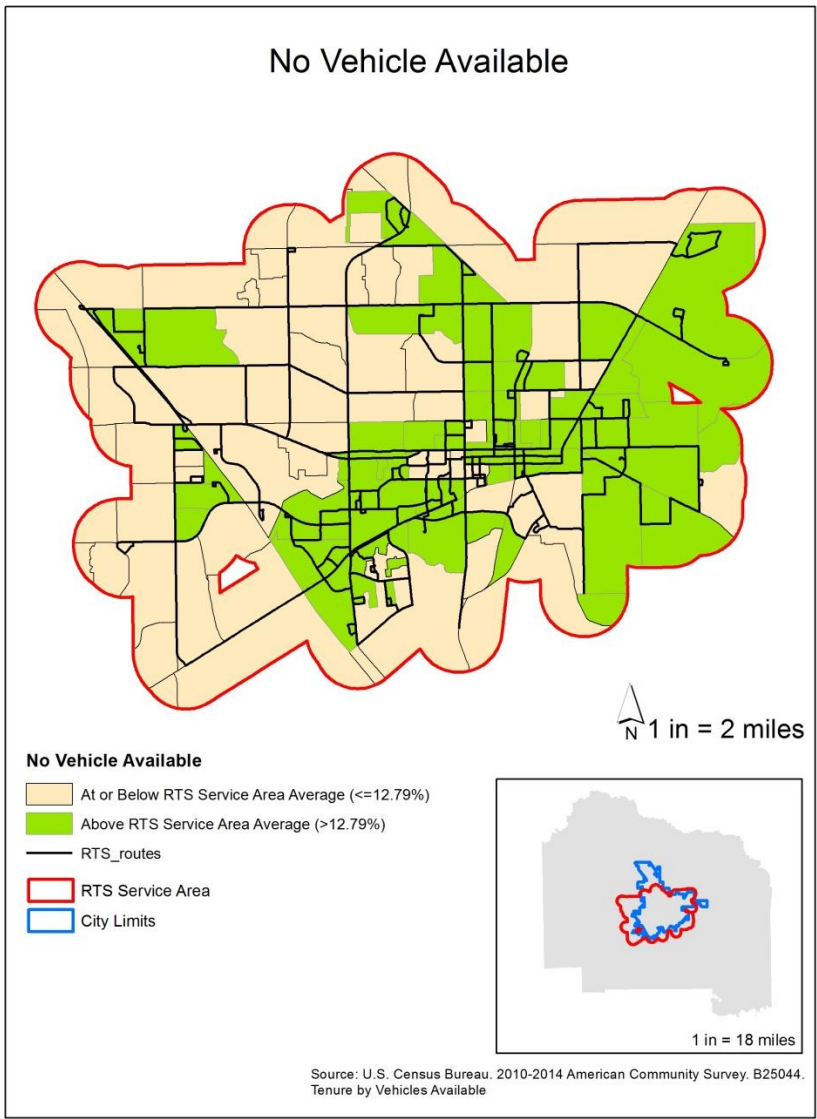
Figure 10: Minority Population by Census Block Group
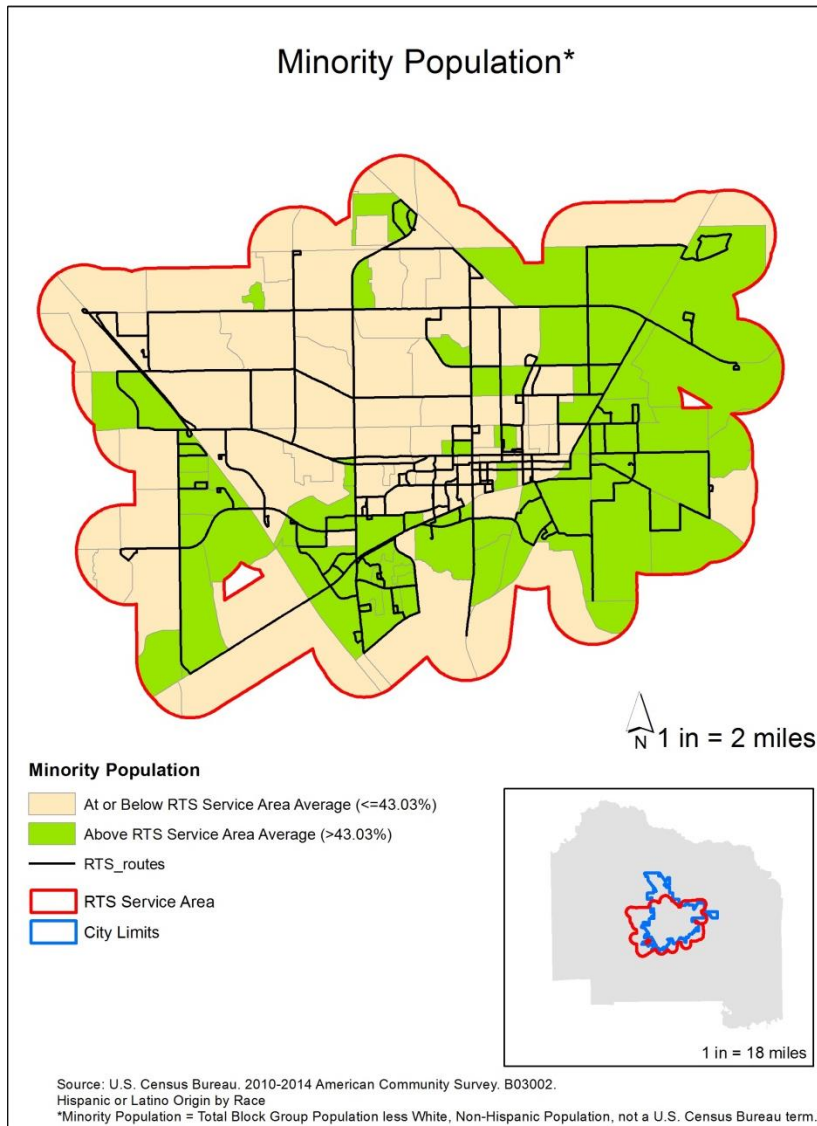
6..5   Other Indicators

6..5.1   *RTS Interpretation Call Service*
RTS added interpretation call service in July 2013. There were fourteen interpretation calls between July 2013 and July 2016; six were in Karen, six were in Spanish, one in Haitian Creole, and one in Arabic.

6..5.2   *Gainesville Fire Rescue and Alachua County Emergency 911 Services – Gainesville and Alachua County*
RTS contacted James Lovvorn, Interim Deputy Chief of Gainesville Fire Rescue (GFR), to obtain a more robust estimate of the number of LEP persons eligible to be served. According to Mr. Lovvorn, GFR encounters LEP persons most often on the University of Florida campus, where student diversity is high. In particular, GFR has noticed that married student housing has high populations of LEP persons relative to other parts of campus.

Alachua County Emergency 911 also provided RTS with a count of the calls it received in the last couple years, including which of these calls required language interpreter services.[17] Between calendar year 2014 and 2015, only 826 calls out of approximately 807,259 total calls require use of the language interpretation services (Figure 11). Of those 826 calls, the overwhelming majority (~92%) were made by Spanish speakers, while 3.5% were made by speakers of Chinese Mandarin (Figure 12).

Figure 11: E-911 Total LEP v. non-LEP Calls for 2014-2015

_____
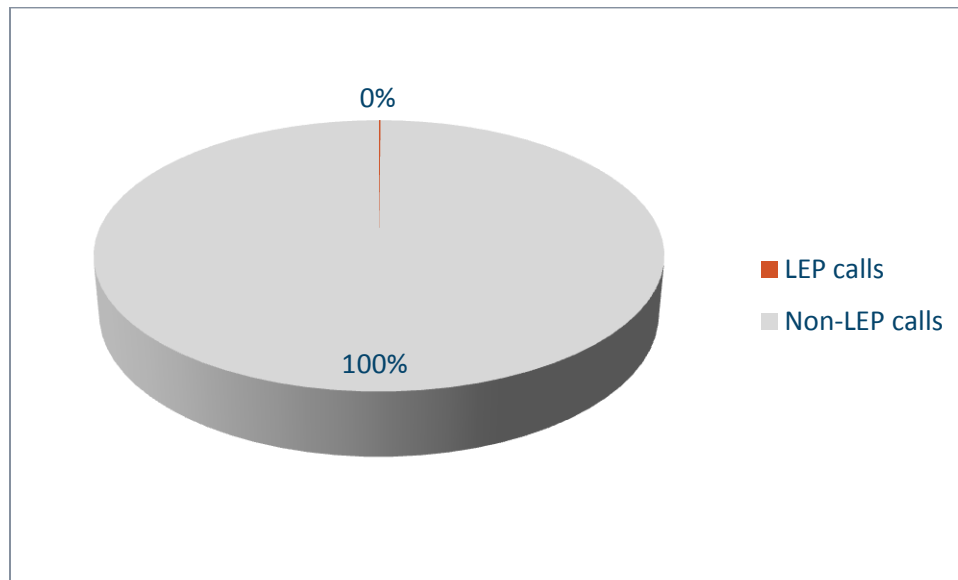
[17] Alachua County Emergency-911 handles calls for the County, as well as all municipalities.

Figure 12: E-911 Language Interpreter Service Usage for 2014-2015

- Spanish
- Mandarin
- Other

4%

4%

92%
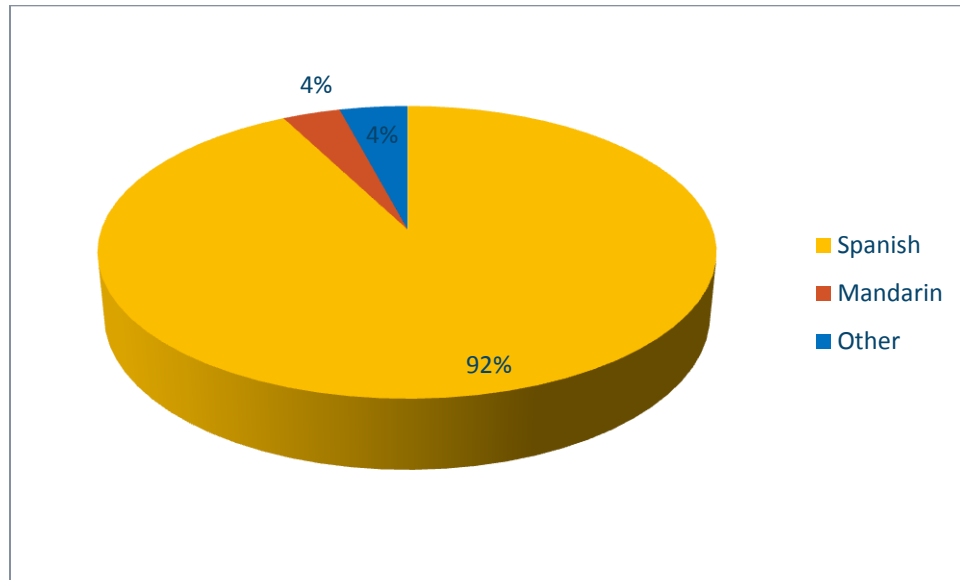
6..5.3   *RTS website*

During calendar year 2015, there were 722,055 visitors to the RTS website. According to Google Analytics, approximately 5% had a browser locale outside the United States. The largest non-English group is Philippines and Chinese. Before the start of every fall semester there is a noticeable increase in page visits from individuals who speak languages other than English.

- **Factor 2: The Frequency with which LEP Persons Come into Contact with the Program**

6..1   RTS Experiences with LEP Individuals

To estimate interactions with LEP populations, RTS interviewed customer service representatives (CSR) individually, and developed and administered a survey to CSR and fixed-route transit operators during December 2015 and February 2016.

Figure 13: Fare information in Spanish.

PASES Y TARIFAS:
Averigüe lo asequible que puede montar estrategia en tiempo real.
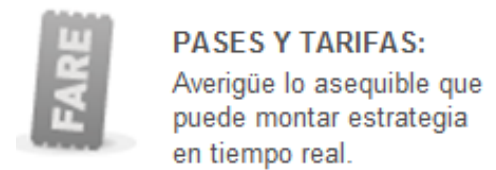
6..1.1   *RTS Customer Service Representative and Transit Operator Interactions*

Interviews with CSRs revealed that they only interact with LEP persons on an infrequent basis.[18] One such example occurred in May 2014, when a Spanish-speaking customer had difficulty understanding the fare schedule. In that instance, a Spanish-speaking administrative staff member was contacted and was able to properly assist the customer. Most CSRs felt that even when customers did not speak English well they were still able to communicate at a level that allowed them to figure out how to use the system. Indeed, since August 2009, the CSRs have received only one complaint, regarding the inadequate provision of materials in languages other than English. A suggestion made by the complainant was to have a Spanish language option made available on the CSR's phone tree, which RTS is looking to implement in the near future.

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[18] CSRs are located at the Rosa Parks Downtown station. This is the primary transfer point for most non-UF based routes.

Figure 14: Transit Operator LEP Persons Survey

Figure 15 shows that transit operators more frequently encounter LEP persons than CSRs. Of the occurrences, 75% involved Spanish and 43% involved Chinese, which directly reflect the LEP person proportion estimates for this area from the U.S. Census (Table 1). Routes 1, 5, 12, 20, and 35 have the most incidences of LEP patrons.

Figure 15: Transit Operator Survey - How Often Drivers Interact with LEP Persons

Figure 16: Transit Operator Survey – Which Languages Drivers Encounter the Most
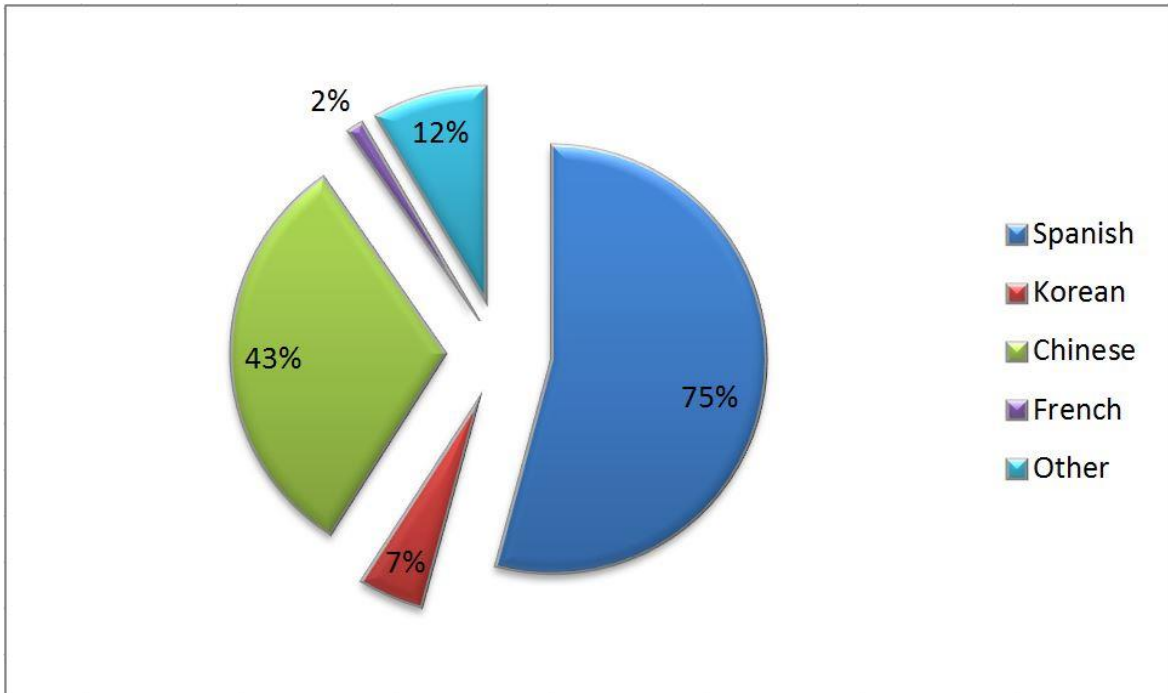
Figure 17: Transit Operator Survey - Which Routes Encounter More LEP Persons
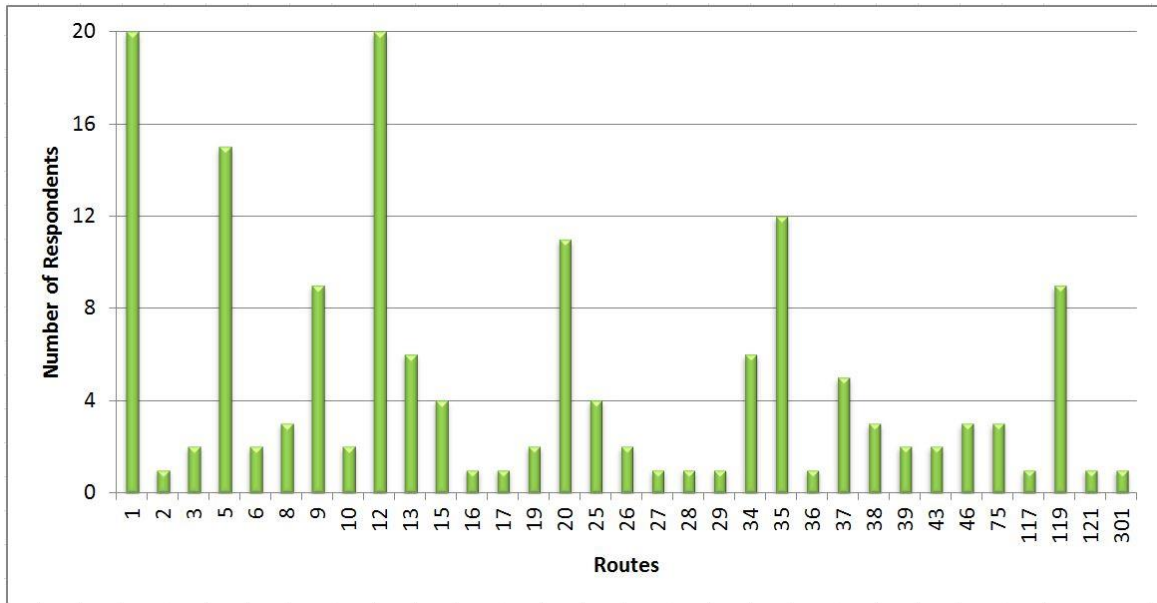
RTS recognizes the limitations of memory recall in forming an accurate count of LEP persons encountered and the language they speak. For that reason, in the near future RTS plans to place "I Speak" cards on every bus (Figure 18). That way when drivers interact with LEP persons they will be able to easily identify what language the individual speaks and whether staff or printed material exist to support the individual.

Figure 18: RTS "I Speak" Card for LEP Individuals

Drivers report the identified language to dispatch, who enter it into the simple database interface shown below.

Figure 19. Database interface for storing frequency of LEP person interactions

6..1.2   *Demand Response – MV Transportation Interactions*

Consultation with Edward Griffin, the General Manager of MV Transportation, Inc., which provides the City's complementary ADA service, revealed that MV operators encounter LEP individuals only on a monthly or yearly basis. During these relatively rare encounters, Spanish is the LEP individual's native language; indeed, MV has never encountered a LEP customer who spoke a language other than Spanish. Translation needs often revolve around trip planning assistance.

6..2   Information Obtained from Community-based Organizations

Following the Factor 1 analysis and operator and CSRs surveys, RTS reached out to Community-based organizations (CBOs) that were perceived as having knowledge on or interaction with Chinese and Spanish LEP populations.[19] RTS felt that these groups could more specifically reveal LEP person interactions with RTS, their transit needs, and their transit desires. Table 4 shows the CBOs that RTS contacted, which include government, religious, employment, and university organizations, as well as ethnic restaurants and markets.

Table 4. CBOs contacted

CBO	Completed Survey
English Language Institute	Yes
School Board of Alachua County, ESOL Department	
School Board of Alachua County, Migrant Education Department	
Santa Fe Community College Adult Education ESOL	Yes
Gainesville Police Department	
Gainesville Fire Rescue	
Gainesville Division of Cultural Affairs	
Alachua County Health Department	Yes
Campus Multi-Faith Cooperative (CMC)	
Gainesville Chinese Christian Church	Yes
Korean Baptist Church of Gainesville	
Ignite Life Center (Centro de Vida Ignite)	
St Augustine Church (Nueva Alianza)	
Queen of Peace Catholic Community (Hispanic Ministry)	
Faith Presbyterian Church (ESOL Program)	
Job Corps	
Labor Ready Inc.	
Latina Women's League	Yes
Institute of Hispanic-Latino Culture	
Asian Pacific American Affairs	
Friendship Association of Chinese Students and Scholars (FACSS)	
UF Graduate Housing	Yes
El Indio Real Mexican Food	Yes
La Tienda Latina	Yes
La Aurora Latin Market	Yes
Mi Apa Latin Café	

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[19] A number of agencies reflected in this table were based on recommendations from other CBOs.

CBO	Completed Survey
Chun Ching Oriental Food Supply	Yes
Small House Chinese Restaurant	Yes
Gator Suyaki	Yes
Wah Ha Ha Thai Food & Noodle Soup	Yes
Good Fortune Buffet	Yes
Eastern Market	Yes
Oriental Food & Gift Market	Yes

RTS collected surveys over a month period and had a final response rate of approximately 48%. RTS contact all groups at least twice using some combination of phone or email. In some cases, the basis for including the group was no longer valid at the time of outreach.

6..2.1 *Chinese CBOs*

The three City of Gainesville Asian markets, four Asian restaurants, and the Gainesville Chinese Christian Church (GCCC) all completed surveys or provided direct input regarding the transit needs of Chinese LEP persons. An example of a completed Chinese CBO survey can be found below (Figure 21).[20]

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[20] RTS acknowledges the limitations in only conducting the survey in English. Staffing capabilities allowed for a Spanish version of the survey but not a Chinese. However, because of the groups that did complete the survey, RTS is confident that they received significant input from those knowledgeable of the Chinese LEP population in the RTS service area. The relationships RTS built as a result of this process will allow Chinese versions of the survey in the future.

Figure 20: Chinese Community Based Organization Survey Response

In general, RTS received homogeneous feedback from the organizations regarding some of the socio-demographic questions. For example, most organizations noted that the Chinese-speaking LEP population in the community aged between 25 and 34, majority of who resided in either UF campus or southwest part of the City. In terms of transit usage, many organizations reported that less than half of the LEP population used transit; and these people only used transit randomly (1-2 days a week). Shopping and school were the highest reported trip purposes for Chinese-speaking LEP population. Regarding what services would be most helpful, most organizations felt that the majority of individuals in the LEP population could read and write in Chinese. Many believed that translated "How to Read Schedules" instructions were helpful; about the same number of organizations suggested to have translated system maps and timetables.

6..2.2 *Hispanic CBOs*

RTS also reached out to a number of Hispanic CBOs, including the UF English Language Institute, Santa Fe College Adult Education for Speakers of Other Languages (ESOL), and local food service businesses. An example of a completed Hispanic CBO survey can be found below (Figure 21).

Figure 21: Hispanic Community Based Organization Survey Response

Similar to the Chinese CBOs, most feedback focused on improving materials that dealt with system navigation. For example, many survey respondents felt that translated system maps and timetables would be the most beneficial to the LEP population. In addition, the English Language Institute felt that "[m]ore weekend transportation…[students] often [feel] stuck on the weekends" was a need of the Hispanic LEP population. Overall, though, most CBOs saw a benefit in all RTS material being translated to Spanish, like event notices and service change announcements.[21]

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[21] As will be seen below, a number of these improvements, such as translated fare payment instructions and, translated information on the RTS website are already offered to the public by RTS. As such, this feedback indicates that RTS needs to do a better job of advertising these services to its customers.

- **Factor 3: Nature and Importance of the Program, Activity, or Service provided by the Program to People's Lives**

Public transportation and regional transportation planning is vital to many people's lives. According to the Department of Transportation's Policy Guidance Concerning Recipient's Responsibilites to LEP Persons, providing public transportation access to LEP persons is crucial. A LEP person's inability to utilize public transportation effectively, may adversely affect his or her ability to access health care, education, or employment.

An on-board survey of all RTS fixed-bus routes was conducted by the Comprehensive Operations Analysis (COA) consultant group in Fall 2013 to collect rider input on current transit services, document rider demographics and travel characteristics, and identify potential future service improvements and policies.

A self-administered questionnaire was distributed by a team of trained survey personnel to all persons boarding surveyed RTS bus runs. An orientation session was conducted for surveyors before boarding their first bus to instruct them about their duties and responsibilities during the survey. This orientation also allowed trainers to address any issues or concerns that surveyors may have had about the process. There were 6,810 total returned surveys.

The results from the on-board survey provide insight into various aspects of RTS service. Salient conclusions drawn from the on-board survey analysis are summarized below.

- RTS bus riders indicated that more frequent service on existing routes, later service on existing routes, and more Saturday service were the most desirable system-wide service improvements. These requests are strongly reflected in the ten year improvement schedule.

- Most of the respondents indicated that they had been using the RTS bus system for 2–5 years. RTS needs to focus on retaining users once they are no longer a student.

- In terms of transit dependency, more than one-quarter of riders stated they would drive if the bus was not available for their trip. This indicates that a number of choice riders use RTS bus service to complete their trips.

- The RTS website, www.go-rts.com, is the primary source for riders to get their information about RTS service, schedules, and changes. Therefore, RTS needs to ensure it is kept current.

- Almost 75% of respondents are between the ages of 18 and 24. Additionally, more than 75% of respondents used a Gator1 as their fare payment to board the bus.

- The majority of respondents (85.4%) speak English at home. Of the respondents who reported speaking a foreign language at home, the distribution was 4.6% Spanish, 4.4% Chinese, and 5.6% other. RTS needs to direct LEP resources to those routes where these individuals were identified in the greatest numbers.

- A comparison of the last on-board survey completed in 2009, revealed similar results. Interesting while all but two fields had the same top response, there was approximately a 5% difference in the share of responses that the top variable received for more than 50% of the

questions showing in most cases increased diversity in responses. One of the fields that switched its top response was the one that dealt with interest in premium service, which changed from "Maybe" to "Yes" since the last survey performed, indicating an increasing interest in enhanced bus service. Furthermore, the number of respondents who selected increasing service frequency increased 15%, which seems appropriate considering the responses to premium service. The typical rider did not change. The overall satisfaction of RTS improved slightly from 4.0 to 4.1.

- **Factor 4: The Resources Available to the Recipient for LEP Outreach, as well as the Costs associated with that Outreach**

6..1   Relevant Programs, Activities, and Services Provided

RTS currently provides the following LEP services:

Figure 22: Universal symbols to convey system information

- Attendance at all RTS public meetings or bi-monthly Citizen Advisory Board (CAB) meetings by a Spanish speaking employee. All meetings will advertise the availability of Spanish and Chinese translation services (in Spanish and Chinese); Chinese translation services will be contracted on an as needed basis.
- The RTS website available in over 50 languages using the Google translation widget.
- System maps and bus schedules in Spanish and Chinese.
- Title VI Notice to the Public, Title VI Complaint Procedure, and Title VI Complaint Form in Spanish and Chinese; see attachments for examples.
- Phone Translation Services for Customer Service calls made to RTS.
- Name tags worn by drivers to identify languages other than English they are willing to assist in (Figure 23).
- Pictographs in vehicles and to depict and emphasize common instructions (Figure 24).
- Fare schedule and Rules of the Road brochure in Spanish.

Figure 24: Evacuation instructions

Figure 23: Nametag letting patrons know driver is available to provide translation services in Hindi

6..2   Marketing Budget for providing Services

In fiscal year 2015, RTS spent approximately $31,300 on printed marketing material. The overwhelming majority of the expenditures were tied to the standard schedule booklets which RTS prints in bulk three times a year to correspond with service changes; Table 5 shows estimated expenditures for each item.

RTS forecasts that the additional printing costs to generate LEP material will be around $400 annually. Like the English printed material more than half of this cost will be for schedule booklets. The current unit cost of standard schedule booklets is roughly $2.00. Given the size of the LEP population and the infrequency with which information like this has been requested of RTS in the past, RTS plans to print a miniaturized version of its current schedule booklet. [22] The standard, large-scale booklet has a map and timetable for each route, which would be cost prohibitive to print and translate at the scales proposed by RTS. The miniaturized version will contain a single, system-wide map listing the frequency and beginning and end locations and times of service for each route. The unit cost of these schedules is estimated at $0.75 and quantities of 50 each will be printed in Spanish and Chinese per semester, as well as made available online for download.

Table 5. Marketing Expenditures

Item	Unit Cost
Interior Cards	$492
Fliers	$300
System Maps	$525
Schedules	$30,000

There are also translation costs associated with this material and assisting LEP persons in general. Currently, these are very difficult to estimate. The translation of Title VI forms and notices and the RTS schedule to Spanish and Chinese was handled internally. As the need for written or verbal translation grows, RTS can expect to spend $75-$150 per hour for translators, approximately $1.50 per minute for phone translation services, and several hundred dollars for universal pictographs to replace written information on buses and at stations. RTS hopes to continue to take advantage of their bi-lingual staff and the wonderful resources offered by UF and SFC to keep costs low (Table 6).

Table 6: Bilingual Staff Inventory

Department	Spanish	Chinese	Korean	French	Other[23]	Total
RTS	13	0	0	1	7	21
MV Transportation	3	0	0	0	1	4
Total	**16**	**0**	**0**	**1**	**8**	**25**

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[22] RTS already prints and distributes this miniaturized version of its schedule in English.

[23] Other languages include Sign Language, Creole, German, Hindi, and Cebuano (Visayau).

7   Language Assistance Plan

RTS plans to provide language assistance to persons with limited English proficiency in a competent and effective manner in order to ensure that their services are safe, reliable, convenient, and accessible. Utilizing examples from other transit agencies and considering the unique characteristics of the City of Gainesville and the RTS service area, RTS has developed the following language assistance plan to reach out to its specific LEP populations.

Figure 25: Fare Schedule in Spanish and English

- **LEP Population Served**

The four-factor analysis evaluated which LEP populations reside within the RTS service area, the frequency with which RTS has encountered these individuals, what types of services they request, and where RTS is lacking in LEP outreach. Taking the results of this four-factor analysis into consideration, RTS is choosing to utilize the Department of Justice's Safe Harbor Provision which focuses on targeting 5% or 1,000 persons, whichever is less, of the population of persons eligible to be served, or likely to be affected or encountered, by RTS, in order to determine if written translation or oral interpretation is necessary. As of this time, those populations in the RTS service area who meet the 5% or 1,000 threshold consist of Spanish- and Chinese-speaking LEP persons.

- **Language Assistance Services**

Table 7 lists language assistance services RTS has accomplished or plans to accomplish. It is divided into three types of services: written, oral, and community outreach. There are four "status" categories:

- Completed – the service has been implemented or is being implemented on an ongoing basis. These services are monitored annually to determine whether they are being kept up-to-date.
- Pending – the service is currently underway and will be completed shortly.
- Proposed – the service is one that RTS is considering and will implement in response to demand and resource availability.
- Not Applicable – the service is not currently needed at RTS. RTS will monitor demand to determine pertinence.

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Table 7: LEP Projects

Action	Proposed	Pending[24]	Completed	N/A
Written Language Assistance				
Translated "How to ride" brochures			2012 (S)[25]	
Translated fare payment instructions			2012 (S)	
Translated system maps and timetables			2015 (B)	
Translated safety and security announcements			2012 (S)	
Translated service change and public meeting announcements			2015 (B)	
Translated Title VI forms			2015 (B)	
Pictographs in stations and in vehicles			1999 (B)	
Ticket vending machines with multilingual functions				
Translated RTS website			2009 (B)	
Translated electronic signs	[26]			
Oral language Assistance				
Hiring permanent, full-time staff interpreters				
Contracting for interpreters on an "as needed" basis				
Using community volunteers to interpret information		2015[27]		
Using bilingual staff to interpret information on an "as needed" basis[28]				
Using telephone interpreter services		2013 (B)		
Translated recorded announcements in stations and in vehicles				
Community Outreach				
Translated TV advertisements				
Translated radio advertisements				
Advertisements in ethnic media	2017			

7..1 Supplementary Actions

RTS departments will take a number of other supplementary actions throughout the year to provide LEP assistance. Some examples of such actions are shown below:

7..1.1 *Marketing*

- Identify competent interpreters and translators.
- Prepare and distribute a script to all employees that addresses:

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[24] Years represent the proposed or completed implementation year.

[25] (S) means the action has been completed for Spanish-speakers. (B) means the action has been completed for both Chinese- and Spanish-speakers. In those cases where the material only exists in Spanish the expectation is also to provide a Chinese equivalent.

[26] At this time RTS does not have electronic signs.

[27] At this time, we have community volunteers at the Rosa Parks Downtown Station weekly for ASL services.

[28] RTS has always used available bilingual staff to provide translation services. This refers specifically to drivers wearing nametags to advertise the language they will provide translation assistance in; see Figure 23.

1. Awareness of the type of language services available and how LEP persons can obtain these services.

2. How to respond to calls from LEP persons.

3. How to respond to LEP persons in person.

4. How to document encounters with LEP persons.

5. How to respond to a Title VI complaint.

7..1.2   *Operations*

- Ensure operators follow the script provided by Marketing.
- Record all encounters with LEP persons.
- Maintain a current list of drivers willing to provide translation services.
- Include Title VI training in annual, summer operators training[29].

Figure 26: Transit Operators Receiving a Presentation about Title VI during Summer Training

7..1.3   *Planning*

- Update demographic data dealing with LEP populations.
- Monitor the frequency of LEP person encounters and adjust Language Assistance Plan, as necessary.
- Determine which RTS documents meet the definition of "vital documents"; stay up-to-date on new documents that may be considered "vital", and determine which documents need to be translated into what languages.
- Make sure all community meetings have a bilingual person available and are clearly advertised as having such.

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[29] Every summer, all RTS transit operators undergo driver training. As part of this training, drivers are educated on how to interact with LEP persons.

- Maintaining an on-going master list of common transit questions and answers translated into Spanish and Chinese and make available to all other staff.
- Interact with CBOs to make sure translated material is being properly distributed.

- ### Providing Notice of Language Assistance Services Availability

All of the CBOs surveyed said they would be willing to distribute RTS material in the future. RTS believes this will be a particularly helpful strategy for reaching Chinese LEP persons since the feedback received from all Chinese CBOs implied or directly stated that this is a tight-knit group that frequents or is a part of the groups we surveyed. RTS also believes that providing name tags to drivers advertising their ability to provide translation services will provide a clear visual cue that RTS is committed to assisting LEP persons. All of these actions will be in addition to bus interior cards and station flyers advertising upcoming public meetings, the availability of translated schedules, and phone translation services for Chinese- and Spanish-speaking individuals.

Importantly, as part of annual summer driver training, RTS planning staff will meet will operators to remind them of the translation services available and the proper protocols for interacting with and assisting LEP persons.

- ### Monitoring, Evaluating, and Updating the Language Access Plan

On an annual basis, RTS will review staff and phone translation service records to assess the number of encounters with LEP persons (by language) experienced by RTS. RTS will also assess the rate at which it distributes translated materials. It will be important for RTS to consider if continued low consumption of these materials is due to the relatively small proportion of LEP individuals in the RTS service area, or other possible factors. Additionally, consulting with the CBOs that RTS interacted with during the survey process will be critical to receiving this evaluation and additional constructive criticism.[30]

Figure 27: Excerpt from Spanish "Rules of the Road" brochure

It is important to note that certain services will always be provided regardless of their consumption rate, like the translated Title VI notice and form, while others may be adjusted, like the number of translated schedules.

- ### Providing Timely and Reasonable Language Assistance to LEP Populations

As indicated in Section 3.2.1.2, each summer all operators participate in a weeklong training course. Since the summer 2013, course has featured a presentation on Title VI responsibilities. During the

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[30] RTS created a contact information database from the CBOs it worked with and will utilize it to distribute and seek feedback on translated materials.

course, planning staff presented information regarding Title VI requirements to the operators. Operators were made aware of the impending availability of translated schedules, a phone translation service availability, and the requirement to notify dispatch of all encounters with LEP persons. Moreover, each Title VI presentation was followed by a question and answer session that went over appropriate and inappropriate responses to LEP individuals, as well as ideas for better interacting with these customers. A number of positive ideas came out of these sessions, including a recommendation to develop a frequently asked transit questions list that in English, Chinese, and Spanish.

A similar training course takes place with all RTS customer service representatives (CSR). Like the transit operator course, the CSR course includes information regarding Title VI and how CSRs should interact with LEP persons. Moreover, CSRs are provided with a list of all staff members who are able to provide language assistance services, as well as information regarding where they can access all Title VI documents, such as RTS's Title VI Notice to the Public, Title VI Complaint Procedure, and Title VI Complaint Form.

8 Safe Harbor Provision

DOT has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

RTS service area does have LEP populations which qualify for the Safe Harbor Provision. As shown in Appendix H, Spanish or Spanish Creole speakers qualify for the Safe Harbor Provision as the number of person which speak English less than "very well" are counted as 1.2% and 2,963 persons. Chinese speakers also qualify as the number of person which speak English less than "very well" are counted as 0.4% and 1,041 persons.

Appendix H

Operating Area Language Data:

RTS Service Area

Data from the U.S. Census Bureau 2014 American Community Survey 5-Year Estimates[31]

Language	County	Percent of Population
Total	237,943	100%
Speak only English	205,881	87%
Spanish or Spanish Creole	14,487	6%
Speak English "very well"	11,524	5%
Speak English less than "very well"	2,963	1%
French (incl. Patois, Cajun)	1,413	1%
Speak English "very well"	1,314	1%
Speak English less than "very well"	99	0%
French Creole	569	0%
Speak English "very well"	399	0%
Speak English less than "very well"	170	0%
Italian	140	0%
Speak English "very well"	128	0%
Speak English less than "very well"	12	0%
Portuguese or Portuguese Creole	988	0%
Speak English "very well"	821	0%
Speak English less than "very well"	167	0%
German	873	0%
Speak English "very well"	739	0%
Speak English less than "very well"	134	0%
Yiddish	-	0%

[31] Data Access and Dissemination Systems (DADS). "U.S. Census Bureau, 2010-2014 American Community Survey 5-Year Estimates." *U.S. Census Bureau*. N.p., 2014. Web. 15 Sept. 2016.

Language	County	Percent of Population
Speak English "very well"	-	0%
Speak English less than "very well"	-	0%
Other West Germanic languages	120	0%
Speak English "very well"	120	0%
Speak English less than "very well"	-	0%
Scandinavian languages	118	0%
Speak English "very well"	118	0%
Speak English less than "very well"	-	0%
Greek	83	0%
Speak English "very well"	83	0%
Speak English less than "very well"	-	0%
Russian	868	0%
Speak English "very well"	709	0%
Speak English less than "very well"	159	0%
Polish	164	0%
Speak English "very well"	57	0%
Speak English less than "very well"	107	0%
Serbo-Croatian	260	0%
Speak English "very well"	233	0%
Speak English less than "very well"	27	0%
Other Slavic Languages	204	0%
Speak English "very well"	176	0%
Speak English less than "very well"	28	0%
Armenian	17	0%

Language	County	Percent of Population
Speak English "very well"	17	0%
Speak English less than "very well"	-	0%
Persian	336	0%
Speak English "very well"	274	0%
Speak English less than "very well"	62	0%
Gujarati	1,013	0%
Speak English "very well"	816	0%
Speak English less than "very well"	197	0%
Hindi	756	0%
Speak English "very well"	635	0%
Speak English less than "very well"	121	0%
Urdu	341	0%
Speak English "very well"	321	0%
Speak English less than "very well"	20	0%
Other Indic languages	681	0%
Speak English "very well"	519	0%
Speak English less than "very well"	162	0%
Other Indo-European Languages	273	0%
Speak English "very well"	249	0%
Speak English less than "very well"	24	0%
Chinese	2,479	1%
Speak English "very well"	1,438	1%
Speak English less than "very well"	1,041	0%
Japanese	411	0%

Language	County	Percent of Population
Speak English "very well"	105	0%
Speak English less than "very well"	306	0%
Korean	969	0%
Speak English "very well"	270	0%
Speak English less than "very well"	699	0%
Mon-Khmer, Cambodian	63	0%
Speak English "very well"	13	0%
Speak English less than "very well"	50	0%
Hmong	6	0%
Speak English "very well"	6	0%
Speak English less than "very well"	-	0%
Thai	199	0%
Speak English "very well"	98	0%
Speak English less than "very well"	101	0%
Laotian	-	0%
Speak English "very well"	-	0%
Speak English less than "very well"	-	0%
Vietnamese	1,298	1%
Speak English "very well"	695	0%
Speak English less than "very well"	603	0%
Other Asian languages	836	0%
Speak English "very well"	588	0%
Speak English less than "very well"	248	0%
Tagalog	885	0%

Language	County	Percent of Population
Speak English "very well"	627	0%
Speak English less than "very well"	258	0%
Other Pacific Island languages	66	0%
Speak English "very well"	50	0%
Speak English less than "very well"	16	0%
Navajo	-	0%
Speak English "very well"	-	0%
Speak English less than "very well"	-	0%
Other Native American languages	10	0%
Speak English "very well"	10	0%
Speak English less than "very well"	-	0%
Hungarian	54	0%
Speak English "very well"	54	0%
Speak English less than "very well"	-	0%
Arabic	634	0%
Speak English "very well"	421	0%
Speak English less than "very well"	213	0%
Hebrew	87	0%
Speak English "very well"	75	0%
Speak English less than "very well"	12	0%
African languages	327	0%
Speak English "very well"	163	0%
Speak English less than "very well"	164	0%
Other and unspecified languages	34	0%

Language	County	Percent of Population
Speak English "very well"	23	0%
Speak English less than "very well"	11	0%

Appendix I

Title VI Equity Analysis

RTS moved to its new maintenance and operations facility in November 2014. The Title VI Equity Analysis report for this facility was submitted with the last Plan. RTS does not have any Title VI Equity Analysis reports to submit with this Plan.

Appendix J

RTS System-wide Service Standards and Policies

Table of Contents

1   Purpose

Service standards allow for the monitoring of productivity, planning decisions based on objective data, and insights into what specific practices lead to higher ridership and revenue. They provide an open, equitable, and codified mechanism for evaluating service provision tradeoffs due to resource constraints, city decision-making, and enacting necessary service adjustments.

Title VI regulations, as outlined in Federal Transit Administration (FTA) Circular 4702.1B, require transit agencies to establish system-wide service standards and policies for existing and new services.[32] Title VI under 49 Code of Federal Regulations Part 21 provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. It is the intention of these service standards to address how Gainesville Regional Transit System (RTS) routing, scheduling, and amenity distribution does not discriminate against any of the protected classes listed above.

RTS service standards and procedures derive from industry norms, best practice research, peer system programs, and current practices. The following sections introduce and define service standard terminology, document RTS's inclusion of Title VI policy requirements, acknowledge related City of Gainesville Comprehensive Plan initiatives, and identify the additional performance standards RTS must develop under Florida Statue (F.S) § 341-071. They also highlight the procedures for route modification, addition, and evaluation and other guiding principles RTS will follow when evaluating services.

2   Terminology

Measures derive from basic units, like dollars, hours, and passengers, and represent a computable attribute of RTS service. Measures can represent a single basic unit or they can be combinations of different units. Depending on their application, they do not necessarily provide any insight into acceptable or desirable performance. For example, consider the implications of two million annual passenger trips for New York City versus Daytona Beach, Florida or the number of passengers for a route that runs 8 hours a day versus one that runs 16 hours a day.[33] Comparing two or more basic units of

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[32] FTA Circular 4702.1B clearly distinguishes between setting service standards and evaluating service against those standards. All agencies must set system-wide service standards and policies but only agencies that operate 50 or more fixed route vehicles in peak service **and** are located in an Urbanized Area of 200,000 or more in population must assess their transit service relative to their standards. Based on *United States Census Bureau, 2010 Census, Summary File 1, P2 Urban and Rural* the Urbanized Area population for the City of Gainesville is 187,781.

[33] Passengers and passenger trips are used synonymously. Specifically, all references to trips are for unlinked trips and all references to hours are for revenue hours. Unlinked passenger trips passengers are counted each time they board a vehicle no matter how many vehicles they have used to travel from their origin to their destination.

measurement commonly adds a level of granularity to performance description. For instance, *passengers per hour* is indicative of transit service productivity.[34]

Standards represent thresholds for measures based on an established expectation of overall performance. Service standards denote goals established by an agency to assess whether services are exceeding, meeting, or failing expectations.[35] Using the indicator above, an example service standard would be "*All campus routes must have at least 15 passengers per hour*."[36] RTS sets standards at both the route and system-level, including standards for transit-supportive infrastructure like bus stops.

- ### Differentiating Service Types

RTS can classify its fixed route services into University of Florida (UF) campus routes (including Later Gator routes) and City of Gainesville/Alachua County routes.[37] Routes are designated UF campus routes when ≥75% of total route ridership is by UF students. Based on fiscal year 2015 ridership data, the following routes meet or exceed this threshold: 9, 12, 19, 21, 22, 28, 34, 35, 36, 37, 38, 40, 46, 117, 118, 119, 120, 121, 122, 125, 126, 127, 128, 129, 300, 301, 302, 303, and 305.

3   Federal and State Requirements

As specified above, FTA and the Florida Department of Transportation (FDOT) (under § 341-071, F.S.) require fixed route transit providers develop service measures.[38] FTA explicitly states the measures for which each provider must develop standards, but FDOT does not. RTS views these federal and state requirements as a minimum and desires to create a more robust paradigm to evaluate its services. The remainder of this section simply identifies the minimum requirements which are discussed in more detail in later sections under the context of RTS's entire service standard framework.

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[34] Frequently, 'metric,' 'measure,' 'indicator,' and similar derivatives are used interchangeably. Differences are largely semantic or field-related. The definitions provided here are for internal RTS purposes, to address any prior inconsistencies in their application and clarify to the reader RTS's intent. RTS recognizes the dual nature of some variables to be classified as both an indicator and a measure. As stated in the text, *passengers per hour* is an indicator of productivity but it is also something that can be measured. However, the units *passengers* and *hours* alone lack context and therefore only represent measures since they provide no indication of productivity. For these purposes, such nuances are unnecessary and the term measure will be used inclusively of indicator.

[35] The relationship between service standards and a system's budget is dynamic. Service levels have a direct impact on operating and capital budgets and vice versa. Services adjust to budget fluctuations.

[36] Route pattern is the series of turns followed by a fixed-route bus throughout the day.

[37] RTS also offers service for UF football games and other UF-affiliated sporting events but these special event services occur irregularly, so they are not included. Later Gator service provides late night service to student-concentrated areas several nights a week, generally starting after 8:30PM.

[38] Variation exists between the language in § 341-071(2), F.S., which states that "Each public transit provider shall establish productivity and performance measures…" and FTA Circular 4702.1B, which requires agencies to development service standards for various indicators.

- **FTA Title VI Requirements**

The basis of service standard development under Title VI is affirmation by transit agencies that they are equitably distributing service between minority and non-minority areas. To make this determination, Circular 4702.1B defines a *minority transit route* as "…a route that has at least ⅓ of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage minority population in the transit service area."[39] The RTS service area intersects 120 of Alachua County's 155 block groups.[40] According to the American Community Survey 2014 5-year estimates, *"Race Alone or in Combination" and "Hispanic or Latino"* minorities represent 43.03% of the RTS Service Area Population.[41] There are 49 block groups in the RTS service area that exceed this percentage.

3..1   Determining Minority Routes

RTS leveraged Geographic Information System (GIS) technology to determine *minority transit routes*. Since RTS does not operate any routes with extended deadhead miles, a quarter mile buffer was placed around all routes to determine the percentage of each route within designated minority block groups.[42] Those routes that exceed the threshold identified above and classified as a minority transit route include routes 1, 2, 3, 7, 9, 11, 12, 13, 15, 16, 17, 19, 22, 23, 24, 25, 26, 27, 28, 34, 35, 36, 37, 38, 39, 62, 75, 117, 301, 305, and 711; see Attachment I for more details.[43] The impact that the multicultural makeup of large universities and colleges has on minority counts is immediately apparent.

[39] The guidance goes on to clarify that an exception does exist where a route operates in such a unique fashion that the population it serves is not wholly reflective of the areas it transverses. This is not the case for any RTS routes.

[40] Block groups generally contain between 600 and 3,000 people. Since population distribution is unknown within each block group, calculations apportioning individuals to the RTS service area for those block groups only partially located within the service area were not attempted; the RTS service area is the area encompassed within a ¾ mile buffer around all routes. Instead the entire population of the block group was allocated to the service area.

[41] Minority individuals are persons classified into any group other than "White Alone, not Hispanic." There are 69,276 minority individuals in the RTS Service Area out of a total population of 163,963.

[42] Deadhead refers to the miles and hours that a transit vehicle travels when out of revenue service. It includes leaving or returning to a garage as well as any other time when there is no expectation of carrying revenue passengers.

[43] Roadways frequently form the boundaries of Census Block Groups. In a number of cases, the Census Block Group on one side of the boundary met the minority status threshold while the Census Block Group on the other side did not. For example, the Census Block Group on the north side of the route has a minority population over 42.25% but the Census Block Group on the south side does not. For simplicity, and to recognize slight discrepancies between digitized streets and Census Block Group boundaries, a buffer was placed around each route so the routes service in each area could be accounted for. The share of each route buffer within minority Census Block Groups was analyzed and if it exceeded ⅓ of the total acreage of the route buffer the route was classified as a minority route; even though route mileage was not used, RTS assumed that the ⅓ share was equally applicable to both revenue miles and the route buffer employed.

3..2   Required Quantitative Standards

Quantitative standards required of all fixed route transit providers include:

- On-time performance
- Vehicle headway
- Vehicle load
- Service availability

3..3   Required Qualitative Policies

Qualitative policies required of all fixed route transit providers include:

- Distribution of transit amenities
- Vehicle assignment (i.e., age of vehicle and type of vehicle)

- **FDOT**

Based on the discretion offered by § 341-071, F.S., RTS has traditionally reported the following measures for its directly operated, fixed-route services:[44]

- Passenger trips
- Revenue miles and revenue hours
- Total operating expense and operating revenue
- Vehicles operated in maximum service
- Base fare
- Average fleet age (in years)
- Service availability (by day of week and hours)
- Revenue miles between vehicle system failures
- Operating expense per (1) passenger trip, (2) revenue mile, and (3) revenue hour

4   RTS Service Standards

The RTS service standard framework includes measures or policies related to route design, bus stop and amenity provision, service delivery, safety and customer satisfaction, and effectiveness and efficiency. Depending on the measure, standards either represent a minimum or maximum threshold. For example, standards related to operating expense measures represent maximum thresholds not to be exceeded, while standards related to productivity measures represent minimum thresholds to be exceeded.[45] The appropriateness of each standard will become apparent over time and will be adjusted as necessary.[46]

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[44] These same measures are also reported for demand response purchased transportation, except average age of fleet (in years).

[45] RTS relied heavily on Transit Cooperative Research Program (TCRP) Report 88 "A Guidebook for Developing a Transit Performance-Measurement System," TCRP Report 100 "Transit Capacity and Quality of Service," TCRP Report 135 "Controlling System Costs: Basic and Advanced Scheduling Manual and Contemporary Issues in Transit

- **Effectiveness and Efficiency**

In transit terminology, effectiveness refers to comparisons of passenger travel to another service attribute while efficiency refers to comparisons of time and money or distance and money.[47] Effectiveness and efficiency measures generally result from comparing:

- Service provided (hours or miles)
- Travel consumed (trips or passengers)
- Cost incurred (dollars and cents)

These comparisons lead to three subcategories: service effectiveness, cost effectiveness, cost efficiency.

4..1 Service effectiveness

Service effectiveness typically measures the travel obtained per unit of service. Example measures include passenger trips per revenue mile and passenger trips per revenue hour.

4..1.1 *Passenger Trips per Vehicle Revenue*

Passenger Trips per Vehicle Revenue Hour measures ridership as a function of the amount of service provided by RTS.

$$passenger\ trips\ per\ vehicle\ revenue\ hour = \frac{annual\ passenger\ trips}{annual\ revenue\ hours}$$

Agencies heavily rely on this measure since service hours are a primary determinant of cost and passenger trips are a primary determinant of fare revenue. Some performance minimums found in other communities include 15 passengers per hour for both Capital Metro in Austin, Texas and Miami-Dade Transit. RTS's service standard for this measure is 19 passenger trips per revenue hour per route.

Scheduling," and FDOT "Florida Transit Handbook 2012." The latter includes performance information for the 28 fixed route transit providers in Florida that report data to the FTA National Transit Database. Where service standards are pulled from the Handbook, maximums are based on not exceeding values in the first quartile and minimums are based on exceeding the median. Peer analysis came from a review of service standards developed by transit agencies in Philadelphia, Pennsylvania; Los Angeles, California; Raleigh, North Carolina; Austin, Texas; Miami-Dade County, Florida; and Broward County, Florida.

[46] One particular area that requires further evaluation is the need to develop separate standards for Summer and weekend service. During the summer, there is a mass exodus of university students, which currently occupy 80% of RTS's ridership. Relative to Fall 2013/Spring 2014 and Fall 2014/Spring 2015, daily ridership for Summer 2014/Summer 2015 represented a 49.0% share. Similarly, Saturday and Sunday daily ridership in Fall 2014/Spring 2015, represented 18.6% and 6.3% shares respectively of weekday service.

[47] Data for all measures comes from Automatic Vehicle Location (AVL), Automatic Passenger Counters (APC), GIS, or farebox software.

4..1.2 *Revenue Miles between Vehicle*

Interruptions in service prevent full capitalization of ridership demand. *Revenue Miles between Vehicle Failures* provides an indication of how often delays and disruptions occur and in turn an agency's ability to adhere to its schedule. Both major and minor mechanical problems are included and failures are still counted even if a bus is able to complete its trip when the problem arises. RTS's service standard for this measure is at the system level and set at 8,595 miles.

4..1.3 *Passenger Miles per Seat Miles*

Passenger Miles per Seat Miles indirectly calculates the degree to which supplied service matches demand.

$$passenger\ miles\ per\ seat\ miles = \frac{average\ trip\ length * total\ passengers}{bus\ capacity * revenue\ miles}$$

Historically, RTS's average trip length has been short, especially for UF-based routes.[48] This measure, however, serves to balance longer, moderately productive RTS routes against those short, highly productive campus-bound routes. RTS's service standard for this measure is 25% per route.

4..2 Cost effectiveness

Cost effectiveness measures the cost incurred per unit of travel or units of travel per cost. Routes with the greatest cost effectiveness give the most value for the amount of money spent.

4..2.1 *Operating Expense per Passenger*

Operating Expense per Passenger Trip indicates how much it costs an agency to move each passenger.

$$operating\ expense\ per\ passenger\ trip = \frac{annual\ route\ operating\ expense}{annual\ route\ ridership}$$

As ridership grows this figure typically falls unless additional drivers are needed and is therefore reflective of local transit demand and the efficiency with which it can be met. RTS's service standard for this measure is at the route level and set at $4.54.

4..2.2 *Farebox Recovery Ratio*

Transit services exist to a large degree to provide mobility for individuals experiencing financial or personal hardship. Consequently, transit services often receive state and federal grants so base fares can remain low and affordable. Most agencies offer discounted fares for children, the elderly, the disabled, and the impoverished. *Farebox Recovery Ratio* balances these efforts by setting a revenue goal for passengers to cover a certain percentage of service cost.

$$farebox\ recovery\ ratio = \frac{fare\ revenues}{operating\ expenses}$$

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[48] In 2010 and 2011, RTS had the shortest trip length of all Florida transit agencies reporting to the NTD. The only other system with a similar average, StarMetro, is also in a student concentrated area.

Fare revenues do include UF or Santa Fe College (SFC) service agreement funding.[49] A route with operating expenses of $100,000 and fare revenue of $25,000 has a farebox recovery ratio of 25% and is less cost effective than a route with a farebox recovery ratio of 50%. RTS's service standard for this measure is set system-wide at 18%.

4..2.3   *Subsidy per Passenger Trip*

A variety of the above measure, *Subsidy per Passenger Trip* measures the price of providing service to individual passengers beyond fare revenue.

$$subsidy\ per\ passenger\ trip = \frac{operating\ expense - \ farebox\ revenue}{passenger\ trips}$$

The interaction between subsidy per passenger trip and farebox recovery highlights changes in ridership and the extent to which those riders are paying full fare. It also helps indicate the extent of subsidization for each route. Miami-Dade and Broward County Transit have set maximum of $4.40 and $5.00 per passenger respectively. RTS's service standard for this measure is set system-wide at $4.40 per passenger.

4..3   Cost efficiency

Cost efficiency measures consider cost incurred per unit of service and provide an indication of how expensive it is to operate. By looking at the cost structure of existing routes, RTS can explicate the influence of factors like deadhead and vehicle speed, and in turn make better predictions regarding the cost of adding new service or changing existing services. The more efficient an agency becomes at providing outputs of service, the lower cost efficiency measures become. These measures, however, provide no indication as to the degree of service consumption.

4..3.1   *Operating Expense per Revenue Mile and Operating*

Both *Operating Expense per Revenue Mile* and *Operating Expense per Revenue Hour* indicate the efficiency with which service can be provided. The primary difference between the two measures is that the latter removes vehicle speeds from the equation. RTS's service standards for these measures are at the system level and set at $4.80 for Operating Expense per Revenue Mile and $75.26 for Operating Expense per Revenue Hour.

4..3.2   *Passenger Trips per Employee Full-time Equivalents (FTEs)*

Passenger Trips per Employee FTE highlights an agency's ability to function lean and extract maximum productivity from their labor force. RTS's service standard for this measure is system-wide at 25,597.

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[49] There are limitations in both including and not include service agreement funding. Including it fails to capture instances where UF students utilize non-UF-funded routes, but not including it is misleading where UF students occupy the majority of route ridership and there is no expectation they will pay a fare. In its absence, the local subsidy will appear much larger than what it actually is, since the student fee is supposed to estimate the revenue that RTS would earn if students had to pay. The revenue RTS collects from its Employee Pass Program is not included in fare revenue since it cannot be allocated to specific routes. RTS will primarily evaluate fare structure changes based on those routes not subsidized by UF and SFC.

- ## Safety and Customer Satisfaction

All agencies strive to minimize accidents and customer service complaints, especially in this digital age where information spreads rapidly and persists. These measures reflect investments in training, vehicle and amenity conditions, and sound operations. They are a top priority across all facets of an agency.

4..1   Preventable Accidents per 100,000 Miles

Preventable Accidents are those where RTS is identified as the responsible party. Accidents are not only problematic for the potential harm they cause to passengers but also because of the impact they have on maintenance costs, the ability to meet peak level service, and increase in lawsuits and insurance rates. RTS's service standard for this measure is system-wide at 1.5 preventable accidents per 100,000 miles.

4..2   Customer Service Complaints per 100,000 Trips

Customer complaints can be minor, like an outdated webpage, or serious and require immediate action, like a discrimination complaint. Classifying customer interaction, though, as a complaint can be ambiguous and requires some discretion by the customer service representative. Consider for example, the following comments:

- Customer #1: "Please add more service to the route 12."
- Customer #2: "The route 12 runs so infrequently I can never get to class on time. This is absolutely ridiculous and inefficient."

In both scenarios, the patrons want more service on the route 12 but while customer #1 phrased their sentiments as a suggestion, customer #2 spoke much more critically. RTS stores customer suggestions and complaints in a database to better track trends.[50] RTS's service standard for this measure is system-wide at 15 complaints per 100,000 trips. There is also an expectation that all customer comments will be given a response within two working days of being received.

- ## Service Delivery

Service delivery measures generally involve those factors that revolve around the customer experience and directly influence whether non-captive riders will utilize the transit system.

4..1   On-time performance

Beyond safety, no other factor has a bigger influence on ridership than on-time performance. As routes fall off schedule, passenger loads shift and vehicles bunch forcing customers to seek out other modes of travel to combat transit travel discomfort and apparent capriciousness. *On-time performance* compares scheduled arrival and departure times against actual arrival and departure times at all specified timepoints. The measure may bifurcate further by time of day, day of week, and block (as surrogate for

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[50] RTS currently tracks customer suggestions and complaints in different databases depending on whether they are maintenance or planning related, which is itself often a judgment call. This separate storage of information results from historic organizational dynamics, and the separate electronic interfaces RTS customers have to submit comments. Future plans involve combining both databases into a single location.

personnel) and reflect needed adjustments related to traffic conditions, passenger loads, and layover requirements.[51]

Table 8.On-time Performance Example

Route	Early	On-time	Late
X	5%	75%	20%
Y	3%	90%	7%
…	…	…	…

On-time performance standards consistent of the margin of lateness and earliness for which a vehicle can still be classified as on-time and the overall desired performance of each route. For RTS, a vehicle is considered on time if it departs a scheduled timepoint no more than 1 minute early and no more than 5.5 minutes late.[52] Table 9 specifies on-time performance standards.[53] RTS will pay particular attention to on-time performance for low frequency routes since the penalty to the patron is so much greater.

Table 9.On-time Performance Standards

Time Period	Frequency (≤30 minutes)	Frequency (>30 minutes)
Peak Hours	70%	75%
Off-Peak Hours	80%	80%
Weekend	80%	80%

4..2   Vehicle assignment

Vehicle assignment refers to the process by which vehicles are placed on routes throughout the transit system. Vehicle assignment standards relate to vehicle age, which serves as proxy for condition and comfort. RTS uses a 12 year lifespan for all standard 40-foot buses and seeks to implement this standard within existing financial constraints to combat fuel economy and maintenance issues associated with older vehicles.

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[51] RTS will utilize APC for all measures related to on-time performance. Though APC units are not installed on the entire RTS fleet, the sampling methodology developed by RTS allows for full system coverage.

[52] "On-time" relates directly to an agency's definition of early and late. The wider the margin, the more leniency an agency is providing itself. Early departures are viewed as more problematic than late arrivals since individuals are required to wait the entire length of the scheduled frequency for the next bus.

[53] When calculating on-time performance as part of the route performance value, RTS will look at overall on-time performance across these periods.

RTS provides Automatic Vehicle Location (AVL) services to its patrons. RTS operates 99 vehicles in peak service during the primary UF semesters and in turn has equipped 99 buses with AVL equipment. The average manufacturing date of these vehicles is 2006. Moreover, RTS utilizes APC to collect passenger information. APC equipment resides on only 30 vehicles. As a result, these vehicles must be rotated system-wide on a weekly basis to ensure adequate sampling. The average manufacturing date of these vehicles is 2009. Therefore, most patrons are typically on a bus that is less than or equal to its life expectancy. RTS's service standard for this measure is at the system level and stated as "Vehicles will be assigned to routes such that the average age of the fleet serving each route does not exceed 12 years and no route or set of routes will routinely have the vehicles towards the end of their useful life."

4..3   Service Availability

Service availability looks at the distribution of service within the RTS service area both spatially and temporally.

4..3.1   *Temporal Availability*

Service span refers to the hours of the day and days of the week when service is available. A route's hours of availability reflect the area it transverses and historic ridership trends and influences the types of trips it makes possible. For example, Later Gator routes end by 3:00AM since bars in Gainesville typically close at 2:00 AM. RTS's service standard for service span is at the system level: "Provide transit service on City/County routes for a minimum of 14 hours per weekday, 12 hours per Saturday, and 8 hours per Sunday on 80% of all fixed routes running on those days."[54]

Table 10.Desired minimum service span

Route type	Weekday	Saturday	Sunday
UF campus routes	6:00 AM to 7:00 PM	11:00 AM to 2:00 AM	11:00 AM to 1:00 AM
City/County routes	6:00 AM to 8:00 PM	7:00 AM to 7:00 PM	10:00 AM to 6:00 PM
Later Gator	8:30 PM to 3:00 AM	8:30 PM to 3:00 AM	N/A

4..3.2   *Spatial Availability*

Areas within ¼ to ½ mile of a transit stop are considered to have transit access. RTS's service standard for spatial availability is at the system level and stated as "80% of the Census Block Groups with their geographic center completely within the RTS service area will be considered served if the geographic center of the Block Group is within ½ mile of a transit stop."[55]

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[54] Note that a route meeting the minimum service span standards in Table 10 for City/County routes would be in service for almost 4,700 hours, less any holidays or reductions in service. Given the continued growth in ridership, RTS also plans to strategically add a minimum of 4,000 service hours each year.

[55] RTS acknowledges that geographic proximity and access to transit are not synonymous due to access barriers like walls, train tracks, and the absence of sidewalks. However, RTS lacks access to more sophisticated network analysis tools to develop a more refined measure.

4..4   Service frequency

Service frequency measures the amount of time between two transit vehicles passing the same point in the same direction on the same route. As frequencies increase, so do costs. Thus, frequencies should be based on existing or potential demand.[56] Nonetheless, below a certain level (typically >60 minutes), passengers cannot reach their destination in a meaningful period of time. Table 3 sets the system-wide service frequency standards RTS will seek to achieve; these are set regardless of demand in order to provide attractive service level. Individual route frequency will derive from the productivity measures outlined above; all minimum peak frequencies are subject to funding but will never be diminished to more than 75 minutes.

Table 11.Desired minimum frequency

Route type	Peak[57]	Off-Peak	Saturday	Sunday
UF campus routes	20 minutes	45 minutes	45 minutes	60 minutes
City/County routes	20 minutes	45 minutes	45 minutes	60 minutes
Later Gator routes	N/A	45 minutes	45 minutes	N/A

When possible, RTS will utilize clock headways (frequency intervals of 15, 20, 30, 40 or 60 minutes) since they are easier for passengers to remember and facilitate better transfer connections between routes. This will be less true for SFC and UF routes where headways are timed to coincide with class schedules.

4..5   Vehicle Load

Vehicle Load serves as a measure of passenger comfort and service availability and is expressed as the ratio of passengers to the number of seats on a vehicle. Therefore, a load factor of 1.0 or 100% for a 40 seat vehicle means that all seats are occupied. When load factors exceed these values, passengers are forced to stand. This is uncomfortable and inconvenient for extended durations, and it also slows boarding and alighting.

Table 12.Vehicle Load Maximum Standards

Vehicle Type	Seats	Maximum Peak Loading Standard[58]	% of Max. Capacity to Seats on Vehicle in Peak	Maximum Off-Peak Loading Standard	% of Max. Capacity to Seats on Vehicle in Off-Peak
40-foot standard bus	40	50	125%	45	112%

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[56] As an example, RTS has a FDOT Transit Development Plan (TDP) initiative to provide 20 minute frequencies or better to all areas zoned as High Density Residential, Activity Center, or Urban Mixed Use because these areas have the greatest concentrations of employment and housing and thus the greatest propensity to use transit.

[57] Peak service is defined as Monday thru Friday between 8:00 AM and 10:30 AM and 4:00PM and 6:30 PM.

[58] A value of 50 with a seating capacity of 40 assumes that 40 individuals are seated and 10 are standing.

- ### Bus Stops

Bus stops serve as the gateway for accessing RTS services and have a direct influence on transit desirability. All stops will be cleaned annually and include route and stop identification information.

4..1   Bus Stop Amenities

Bus stop amenities ensure safety, accessibility, and comfort at RTS stops. RTS uses ridership levels to ensure equitable distribution of amenity provision rather than just focusing on select corridors or sections of the RTS service area.[59] Table 13 shows the thresholds RTS uses when allocating amenities.

Table 13.Bus Stop Amenity Thresholds

Stop Type	Daily Passengers	Amenities
I	<15	Landing Pad and Waiting Pad
II	≥15 and ≤35	Type I + Bench and Trashcan
III	≥36 and ≤80	Type II + Shelter
IV	>80	Type III + Bus bays

Apart from amenities in the field, RTS will strive to provide in-bus amenities or other services to aid in passenger safety, expediency, and system use. This includes: real-time bus location information; print and electronic service media regarding schedules, route maps, and transfers; audible stop announcements; and trip planning software

4..2   Bus Stop Placement

Bus stop spacing is based on several factors, including customer convenience, ridership demand, and vehicle speed. Closely spaced stops reduce walking distance but slow buses down, while stops spaced further apart increase walking distance but speed buses up. RTS's service standard for this measure is system-wide at six to eight stops per mile or every 660 to 880 feet. This interval will fluctuate depending on the presence or absence of trip generators and safety and accessibility concerns.[60] Bus stops with <5 daily passengers over a year long period will be reviewed for elimination.

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[59] Most local funding for stop improvements comes from developer fees. These funds must be expended within ¼ to ½ mile from where they were collected. Since state and federal grants typically require a local match, their expenditures are often tied together. Since fiscal year 2014, RTS is coordinating with City and County Public Works to give them lists of the most active stops that lack sidewalk connections, lighting, and street crossing signage to take advantage of any funding they may have for stop improvements.

[60] All stops to the greatest extent possible should follow Crime Prevention through Environmental Design (CPTED) policies regarding landscaping and lighting to allow for safety from injury and crime. This includes removing landscaping that hinders vision of a stop from a driver's perspective and relocating stops to allow drivers to easily see waiting passengers when approaching a bus stop. All stops must also be accessible to any persons waiting to use transit, including disabled riders.

- **Route Design**

RTS considers route design factors when developing or modifying routes. When doing this, it is vital to acknowledge that transit achieves the most success where certain urban form characteristics and route patterns exist.

4..1   Sidewalk characteristics

Limitations in street network connectivity, poor pedestrian access and mobility, physical barriers, and other conditions make accessing transit unsafe or unfeasible for prospective riders. RTS's service standard for this measure is system-wide: "Sidewalks will accompany all routes for at least 50% of their length."

4..2   Demographic and social characteristics

RTS riders who lack access to a personal automobile rely on transit as their lifeline to employment, educational opportunities, medical facilities, shopping, and other necessary services. RTS will provide services within ¼ mile of the block groups within its service area that have a value for the below variables that is higher than the RTS service area average:

- Zero-vehicle households (>12.79%)[61]
- ≥ 65 years old (>9.16%)[62]
- Below Poverty (>28.19%)[63]

4..3   Route directness

RTS routes should be designed to operate as directly as possible in order to minimize travel time, eliminate transfers, and compete with standard automobile speeds. To do this, RTS buses should operate on arterial and collector roads, minimizing turning movements and operation on local roads. RTS's service standard for this measure is system-wide: "The distance between a route's origin and destination should not exceed 175% of the shortest possible driving distance between these two points by personal automobile."[64]

Deviations from the basic alignment of a fixed route should only occur to serve major activity centers or to provide coverage to areas with limited access to transit, and they should result in an increase in productivity. The additional time needed to deviate from the basic alignment should not exceed 5 minutes or 10% of the one-way travel time of the existing route without deviation and be of no greater

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[61] U.S. Census Bureau, 2014 American Community Survey 5-year estimates, B25044: Tenure by Vehicles Available.

[62] U.S. Census Bureau, 2014 American Community Survey 5-year estimates, B01001: Sex by Age.

[63] U.S. Census Bureau, 2014 American Community Survey 5-year estimates, B17017: Poverty Status in the Past 12 Months by Household Type by Age of Householder.

[64] RTS will use widely available, internet-based trip planning algorithms to make these calculations. The measure will consider distance traveled from one bus endpoint to the other divided by the optimal driving distance between these two points as identified by the trip planning software.

distance than 1 mile. Branches or short-turns should be reviewed as possible alternatives where passenger load after a certain point is only a fraction of the maximum load.[65] Routes may include up to 2 branches but only 1 short-turn.

Route directness should also take into consideration route length. Longer routes are subject to more sources of delay and in turn have a greater difficulty staying on schedule.

4..4   Travel Speed

Slow travel speeds mean more time spent on unproductive activities and, in particular, can result in lost wages. Travel speed will compare system-wide average speeds against a weighted average (miles of roadway) of roadway speeds.[66] RTS's service standard for this measure is system-wide and sets transit speeds at no less than 66% of the weighted average roadway speed.

4..5   Route spacing

Route spacing indicates the extent of service duplication, unused capacity, and how well RTS distributes its services. While routes should intersect with other routes to allow transfers, parallel routes operating closely together have the potential to split service demand. RTS will calculate for each route, the miles it overlaps with all other individual routes relative to its own total length and then consider the maximum of these numbers. No RTS route should overlap with any other single route for more than 33% of its length.[67]

5   RTS Service Monitoring and Evaluation

The following sections outline the three types of assessments associated with RTS service monitoring and evaluation. The overarching designs of each evaluation are to ensure equitable service and satisfactory return on investment.

- **Title VI Evaluation**

Since the values for minority and non-minority routes are at the population level (inclusive and built upon all system routes) and not derived from samples, Circular 4702.1B does not specify a methodology for calculating whether a statistically significant difference (one that cannot be explained by chance alone) exists between the service measure variable values for minority and non-minority routes. Therefore, analyses of differences between the variable values for minority and non-minority routes will be based on a visual inspection of their magnitude.

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[65] A branch is one of two or more outer route segments served by a single route. Short turns are routes where some vehicles travel the entire length of the route while others turn around at a designated point along the route.

[66] RTS recognizes the limits of this approach since it does not include walk time, wait time, or fully capture in-vehicle time. Future service standard versions may create a set of 5-10 origin/destination pairs identified through origination/destination surveys and compare auto versus transit travel times.

[67] Special conditions may exist that necessitate routes to operate within closer proximity than this guideline suggests.

Table 14 shows an example analysis table for a measure outlined in section 3.1.2. RTS considers differences of 10% or more problematic and requiring corrective action. What these actions will be are measure-specific and will be implemented on a case-by-case basis. For example, if there are differences in on-time performance, RTS will first determine whether it is a particular route that is problematic. RTS will then proceed to make segment and route level adjustments to correct identified problems.

Table 14.On-time performance (Example)

Variable	Minority Routes	Non-Minority Routes	Difference
On-time Performance	…	…	…%

• Route Evaluation

From the gamut of measures identified in section 4, RTS will specifically focus on operating expense per passenger trip (OEPT), passenger trips per revenue hour (PTRH), subsidy per passenger (SP), on-time performance (OTP), route directness (RD), route spacing (RS), and passenger miles per seat miles (PMSM) when evaluating individual route performance. These seven measures encapsulate efficiency, effectiveness, design, and service delivery concerns and serve to hold RTS fiscally responsible and accountable for proper resource utilization.

5..1 Methodological Procedures

1. The value for each of the measures is calculated for every route: $OEPT_i$, $PTRH_i$, SP_i, RS_i, RD_i, OTP_i, and $PMSM_i$.[68]

2. For each measure, the individual route value is compared against the standard to provide an indication of whether the route is meeting, exceeding, or falling below the standard.[69]

$$standard\ ratio = \frac{route_i}{standard}$$

3. The measures are combined to create an overall Route Performance Value of a focal route (i).

$$RPV_i = \frac{\frac{OEPT_s}{OEPT_i} + \frac{PTRH_i}{PTRH_s} + \frac{RS_s}{RS_i} + \frac{RD_s}{RD_i} + \frac{SP_s}{SP_i} + \frac{OTP_s}{OTP_i} + \frac{PMSM_i}{PMSM_s}}{7}$$

It is worthwhile to note that the variables chosen to be included in this metric represent the importance that RTS places on the various standards categories. For instance, 4 of the 7 measures included ($OEPT_i$, $PTRH_i$, SP_i and $PMSM_i$) represent some form of efficiency and effectiveness. This

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[68] RTS will only evaluate routes in service for over a year. Fall and spring values will be averaged together unless span of service has changed by more than two hours or frequency has increased or decreased by more than 50%. If either condition is met only the performance values for the current iteration of service will be considered.

[69] Subscript i represents individual route values; subscript s represents measure standard values. For measures, OEPT, RS, RD, SP, and OTP smaller values represent better performance so an inverse relationship exists.

implies that 4/7^{ths} of the performance of a route is based on the route's adherence to the standards of those categories, since each of the 7 measures are weighted equally. Similarly, 2 of the included measures (RD$_i$ and RS$_i$) pertain to route design, so we are implicitly asserting that effectiveness is twice as important as route design.

4. Routes are then assigned to one of three "performance categories" and adjusted as needed. Table 15 shows an example table. Conditional formatting will highlight individual performance for each measure; green (above average), yellow (average), and red (below average).

Table 15.Route Performance Values

Route	OEPT	PTRH	RS	RD	SP	OTP	PMSM	RPV
X	1.10	0.90	1.30	1.15	0.95	1.05	0.85	1.04
Y	0.85	0.75	0.65	0.83	1.05	0.92	1.10	0.88
…		…	…	…	…	…	…	…

5..2 Evaluation Categories

5..2.1

Low performing routes have a performance value of <0.75. These routes drain resources and benefit only a few so they must be evaluated for potential adjustments. Any route with three or more measures classified as low-performing will be considered a low performing route and subject to the correctable measures outlined below.

5..2.1.1 Correctable measures

Actions to improve route performance:

- Segment-level analysis (timing or reliability)
- Targeted marketing
- Public outreach (customer surveys and interviews)
- Service level changes (frequency, re-routing, or geographic coverage)
- Route discontinuation[70]

5..2.2

Average performing routes have performance values of ≤1.25 and ≥0.75. These routes require no immediate modification but will be reviewed at the segment and stop level to see if there are efficiencies to be gained, especially if any particular measure is identified as low performing.

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[70] Route discontinuation should be the last option for dealing with a low-performing service. Discontinuation could be applied to a segment of a route or an entire route. Special consideration will be given to those routes where over 50% of the service area is in census block groups identified in section 4.5.3; service area is defined as any area with ¼ mile of a route.

5..2.3

High performing routes have a performance value of >1.25. These represent the system's thriving routes and may benefit from enhanced service, including increased frequency or additional amenities.

5..3 Minimum Standards

Each year during the performance evaluation process, RTS will review changes in overall system performance (either percent improvement or decrease) for each variable and route, as well as those reported by FDOT in the Florida Transit Handbook to determine whether any service standards need adjusting.

5..3.1

RTS will compare route performance values between subsequent years to help anticipate unacceptable changes in performance, which are defined as shifts downward of more than 0.15.

• System Evaluation

An iterative process will address any system-wide deficiencies. For those measures where a system standard exists, RTS is performing either acceptably or unacceptably (see Table 16 as an example analysis table). Unacceptable performance is defined as any ratio value of <0.75 resulting from the comparison of actual system performance to the stated standard; this value will derive from the average of individual route performance. Adjustments will be sought at the individual route level to raise performance to acceptable levels. For example, if only 45% of overall system route length is adjacent to sidewalks then adjustments will be implemented, where possible, for routes with low route directness to not only remove unnecessary segments but also place remaining segments in areas where sidewalks are present.

Table 16. System Performance Values (Example)

System Variable	Standard	System Value	System Performance
X	60%	43%	0.72
Y	$4.50	$3.75	1.20
…		…	…

• Evaluation Frequency

RTS will evaluate service annually in conjunction with the mandatory FDOT TDP. This will occur during the summer so changes can be implemented in fall. The plan will include the results of the analyses.

• Enacting Service Changes

Service changes result from the performance evaluation process, Comprehensive Operational Analyses, and input received from a host of stakeholders, including the public, RTS Citizens Advisory Board, elected officials, other local government offices, and non-governmental organizations. All service change requests elicited from these stakeholders undergo a technical evaluation where they are first reviewed against route design service standards. Those that satisfy all standards are reviewed in FDOT Transit

Boardings Estimation and Simulation Tool (TBEST) to project ridership values and compared against estimated operating (service span) costs to determine if they meet those established standards; capital costs (bus requirements derived from route length, frequency) are also considered. If they do, RTS will develop preliminary recommendations tied to perceived system-wide impacts and seek funding for the improvement in light of all other existing priorities. This process typically takes 2-4 months and includes the addition of new stops.

5..1   **Public Notice**

- Changes of >5% to an existing route's pattern (measured in route miles) require 1 public meeting to gather input on how this change will affect riders and the community. RTS will determine whether the community agrees with the change, wants to modify the proposed change, or does not want to proceed at all.[71]
- Route changes of <5% do not require a public meeting.

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[71] All new routes require public meetings. Moreover, all semester transitions are accompanied by a public meeting to review minor and major changes.

Attachment I.   Minority versus Non-Minority Route Coverage

Route	Acreage in Minority Census Block Groups	Acreage in Non-Minority Census Block Groups	Acreage based on 0.25 Mile buffer	Minority Share	Minority Share	Minority Route
1	1,042.7	916	1,959	53%	47%	Yes
2	1,949.6	172	2,121	92%	8%	Yes
3	1,857.0	453	2,310	80%	20%	Yes
5	266.0	1,872	2,138	12%	88%	No
6	740.6	1,697	2,438	30%	70%	No
7	1,643.9	273	1,917	86%	14%	Yes
8	799.0	2,274	3,073	26%	74%	No
9	663.2	888	1,551	43%	57%	Yes
10	231.1	2,579	2,810	8%	92%	No
11	1,450.0	585	2,035	71%	29%	Yes
12	993.0	463	1,456	68%	32%	Yes
13	490.3	718	1,208	41%	59%	Yes
15	1,153.2	1,517	2,670	43%	57%	Yes
16	647.8	546	1,194	54%	46%	Yes
17	502.3	621	1,123	45%	55%	Yes
19	480.7	535	1,016	47%	53%	Yes
20	541.9	1,382	1,924	28%	72%	No
22	584.5	609	1,193.2	49%	51%	Yes
23	539.4	845	1,384	39%	61%	Yes
24	2,232.3	916	3,149	71%	29%	Yes
25	1,724.3	1,171	2,895	60%	40%	Yes
26	2,260.6	316	2,577	88%	12%	Yes
27	738.6	965	1,704	43%	57%	Yes
28	710.2	869	1,579	45%	55%	Yes
29	258.1	1,070	1,328	19%	81%	No
34	972.1	877	1,849	53%	47%	Yes
35	1,289.5	744	2,034	63%	37%	Yes
36	1,105.2	654	1,759	63%	37%	Yes
37	1,181.1	537	1,718	69%	31%	Yes
38	726.9	572	1,299	56%	44%	Yes
39	1,299.0	2,275	3,574	36%	64%	Yes
40	134.1	2,160	2,294	6%	94%	No
43	247.2	3,126	3,373	7%	93%	No
46	137.1	661	798	17%	83%	No
62	1,238.0	591	1,829	68%	32%	Yes
75	1,982.9	1,672	3,655	54%	46%	Yes
76	533.3	2,180	2,713	20%	80%	No
77	372.7	1,872	2,245	17%	83%	No
117	657.8	620	1,278	51%	49%	Yes
118	193.8	719	913	21%	79%	No
119	165.9	745	910	18%	82%	No
120	20.1	617	637	3%	97%	No
121	71.9	746	818	9%	91%	No
122	407.1	816	1,223	33%	67%	No
125	148.1	890	1,038	14%	86%	No
126	201.9	1,189	1,391	15%	85%	No
127	67.2	496	564	12%	88%	No
129	193.3	1,167	1,360	14%	86%	No
300	194.2	1,147	1,341	14%	86%	No
301	1,319.5	1,303	2,623	50%	50%	Yes
302	703.8	1,794	2,498	28%	72%	No
303	630.5	1,296	1,927	33%	67%	No
305	1,148.3	899	2,047	56%	44%	Yes
711	2,224.2	632	2,857	78%	22%	Yes