



# 2023 Title VI Program

Adopted October 2023

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Date

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## Introduction

The Federal Transit Administration (FTA) is responsible for ensuring that its funding recipients fully comply with Title VI of the Civil Rights Act of 1964. The City of Longview, which operates RiverCities Transit, is a recipient of federal funds. As a recipient of federal funds, RiverCities Transit has prepared its 2023 Title VI Program in accordance with FTA Circular 4702.1B, dated October 1, 2012.

Section 601 of Title VI of the Civil Rights Act of 1964 states the following: *"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."*

## I. RiverCities Transit Title VI Policy Statement

RiverCities Transit (RCT) 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. RiverCities Transit's objectives are to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

## II. Inclusive Public Participation Practices

RiverCities Transit's public communications are targeted to a broad social, ethnic, age and economic spectrum that make up the population of our service area. RiverCities Transit routinely uses a variety of communication tools that include a direct reference to the agency's adherence to Title VI requirements and that by their nature and means of dissemination are intended not only to reach a broad social and economic spectrum of our service area population and the marketplace for vendor product and services, but also are tools which are intentionally non-exclusionary in any way. Agency communication tools that serve the purpose maximizing public engagement include the following:

- A. Posting announcements on the RiverCities Transit website at [www.rctransit.org](http://www.rctransit.org)
- B. Publishing announcements and alerts on the City of Longview and RiverCities Transit Facebook



pages

### C. Non-website Communication Tools that Foster Public Participation

Examples of relevant, specific non-website communication tools that encourage broad spectrum public participation and identify participation opportunities include the following:

- RiverCities Transit's System Map & Schedule is available on buses, at our Downtown Transit Center in Longview, Longview City Hall, Kelso City Hall, Lower Columbia College Student Center, Longview Library and Kelso Library.
- RiverCities Transit Rider Updates and Alerts are posted on all fixed route and paratransit buses and at the Downtown Transit Center.
- Customer Comment Opportunities include customer comment cards, in-person opportunities at the Transfer Center, RCT business office, by phone, and through email.
- Example of opportunities for participation in the public comment process related to the 2016 Fare Increase are provided in this document's *Appendix B – Sample of Communication Tools*.

In addition to RCT encouraging public participation through a variety of communication tools, the LEP section of this program document speaks to other RCT efforts to identify and encourage public participation while being sensitive to environmental justice issues.

Having not yet met the required threshold of 1,000 people or greater than five (5) percent limited English proficiency population in the service area, RCT does not routinely provide non-English translations of publications and notices. RCT will make literature available in Spanish upon request.

## III. Procurement and Project Management

RiverCities Transit includes standard non-discrimination clauses in all contracts and procurement solicitations. In programming federal funds for award in FTA's TEAM system, RiverCities Transit works closely with FTA Region 10 to ensure that any project related environmental issues are identified. RCT has most recently programmed federal funding for bus procurements and operations of Fixed route. In these projects, RCT identified whether SEPA and/or NEPA pertains. To date, all RCT federally funded projects have a categorical exclusion (CE) designation from FTA.

## IV. System Wide Service Standards and Policies

Pursuant to requirements set forth in the Federal Transit Administration (FTA) Circular 4702.1B, RiverCities Transit (RCT) must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies as part of the Title VI program. The standards and policies we set must address how our service is distributed across the transit system and needs to ensure the way we distribute our service allows ALL users access. The service standards and policies contained herein are used to develop and maintain efficient and effective fixed-route transit service and will support the goal of Cowlitz Transit Authority (CTA) to provide safe, reliable, and efficient transit services for all users. The system service standards and policies may be expanded in future years as the CTA and RCT continue

to adapt to meet community needs.

## **SERVICE STANDARDS**

Service standards are quantitative standards that allow us to measure performance and serve as a guide for making service decisions. Individual public transportation providers are to set service standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry. The FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators:

- A. Vehicle Load
- B. Vehicle Headways
- C. On-time Performance
- D. Service Availability

### **A. Vehicle Load**

Vehicle Load Factor is described as follows by FTA Circular 4702.1B: *Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standards for peak and off-peak times for each mode of fixed-route transit service (i.e., bus, express bus, bus rapid transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.*

Vehicle Load is an indicator of the extent or probability of overcrowding and may indicate the need for additional vehicles to maintain useful service. The CTA proposes a vehicle load factor of 1.5 which means all 32 seats would be occupied and approximately 16 would be standing. According to manufacturer specifications, our low-floor buses can accommodate a maximum of 51 standees. Vehicle Load Factor will be monitored regularly to ensure customer comfort and to determine whether additional capacity should be added to specific trips or routes based on changing demand patterns. RCT operators count every passenger which will allow for this monitoring.

### **B. Vehicle Headway**

Vehicle headway is described as follows by FTA Circular 4702.1B: *Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., four buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally*



*expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15-minute peak headways and 30-minute off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For example, a service standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.*

CTA has established a goal of at least 45-minute headways on all routes. RCT currently operates eight (8) routes on 60-minute headways, one (1) route on a 20-minute headway during weekday peak hours. Headway standards for future routes will be determined by a number of factors including ridership productivity, transit and pedestrian friendly streets, and density of transit dependent population and activities.

### **C. On-Time Performance**

On-time performance is described as follows by FTA Circular 4702.1B:

*On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed "on-time" window.*

On time performance is an indicator of our service reliability. A bus is determined to be late if it departs the published time point three or more minutes later than the scheduled time. A bus is considered early if it departs from a published time point more than one minute before the scheduled departure. It is the goal of CTA to be on-time at least 90 percent of the time. RCT supervisory staff regularly monitors on-time performance and counsels operators who consistently fail to meet on-time performance standards that are within their control. Discussions with bus operators are also used to identify vehicle scheduling issues which are corrected through service changes.

### **D. Service Availability**

Service availability/transit access is described as follows by FTA Circular 4702.1B:

*Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between*



*stops or stations. These measures related to coverage and stop/station distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distance might be a shorter distance than it would be in less densely populated areas, and the percentage of the total population within a one-quarter mile walk of routes or lines might be higher in more densely populated areas than it would be in less densely populated areas. Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.*

The goal of CTA is to ensure all residents of the urbanized area live within one-half mile of a bus stop provided geographic constraints, such as rivers and topography. Transit access is determined using Geographic Information Systems (GIS) by mapping the distance of all bus stops to the centroid of 2020 Census block groups.

## **SERVICE POLICIES**

The FTA requires fixed-route transit providers to develop a policy for two service indicators. Transit providers also may opt to set policies for additional indicators. The following system-wide policies differ from service standards in that they are not necessarily based on meeting a quantitative threshold, but rather qualitative evaluation results:

- A. Vehicle Assignment
- B. Transit Amenities

### **A. Vehicle Assignment**

Vehicle assignment is described as follows by FTA Circular 4702.1B:

*Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.*

The RCT fixed-route fleet contains two different vehicle types; Gillig Low Floor and Ford Starcraft Cutaway. The maintenance department and RCT dispatch coordinate weekly on the deployment of buses on all bus routes. Vehicles are assigned to routes every week on a rotation. Operators may drive the same route every week, however they will likely drive a different bus throughout the week. Buses are also assigned to routes based on route constraints. Due to the increased height of our hybrid bus, it is restricted to routes to minimize damage from tree branches. All RCT vehicles are thoroughly maintained and cleaned daily, and equipped with video surveillance.

## **B. Transit Amenities**

Transit amenities are described as follows by FTA Circular 4702 1B:

*Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this...applies after a transit provider has decided to fund an amenity.*

Transit amenities include shelters, trash receptacles, benches, information kiosks and bike racks. Transit amenities are distributed on a system-wide basis. The location of transit amenities is determined by factors such as ridership, availability of right-of-way, and staff recommendations.

## **V. General Title VI Contacts and Complaint Process**

RiverCities Transit's Title VI notice to the public and instructions on filing a complaint is posted on the agency website, in the downtown transit center and on every vehicle. The notice is also printed on every transit brochure.

RiverCities Transit is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities, and to the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with RiverCities Transit within 180 calendar days from the date of the alleged discrimination. Formal complaints must be filed with RiverCities Transit in writing and addressed to:

RiverCities Transit  
Title VI Compliance Coordinator  
PO Box 128  
Longview, WA 98632  
360-442-5663; (TTY Relay: 711)  
[customerservice@rctransit.org](mailto:customerservice@rctransit.org)

The public also has the ability to contact the Federal Transit Agency (FTA) directly as they deem appropriate.

Federal Transit Administration, Region 10  
Office of Civil Rights  
Attention: Title VI Program Coordinator  
915 Second Avenue, Suite 3142  
Seattle, WA 98174



### **What is Title VI of the Civil Rights Act of 1964?**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color and national origin in programs and activities receiving Federal financial assistance.

RiverCities Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1 A. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

### **How do I file a Title VI Complaint?**

The complaint form is included in Appendix A of this document. You may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant or important.

The complaint may be filed in writing with RiverCities Transit at the following address:

RiverCities Transit  
Title VI Coordinator  
PO Box 128  
Longview, WA 98632  
By phone: 360-442-5663  
By Fax: 360-442-5979

NOTE: RiverCities Transit encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

### **What happens to my complaint after it is submitted to RiverCities Transit?**

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by RiverCities Transit will be directly addressed by RiverCities Transit. RiverCities Transit shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, RiverCities Transit shall make every effort to address all complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, RiverCities Transit will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

Once sufficient information for investigating the complaint is received by RiverCities Transit, a written response will be drafted subject to review by the transit's attorney. If appropriate, RiverCities Transit's attorney may administratively close the complaint. In this case, RiverCities Transit will notify the complainant of the action.

How will I be notified of the outcome of my complaint?

RiverCities Transit will send a final written response to the complainant and advise the complainant of his or her right to: 1) appeal within seven (7) calendar days of receipt of the final written decision from RiverCities Transit, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Can I file a complaint with another agency or organization?

In addition to the complaint process described above, you may file a Title VI complaint with the following offices:

Federal Transit Administration  
Region 10 Office of Civil Rights  
Attention: Title VI Program Coordinator  
915 Second Avenue, Suite 3142  
Seattle, WA 98174



## Appendix A- Complaint Form

## TITLE VI COMPLAINT FORM

Page 1

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and send it to:

RiverCities Transit  
Title VI Coordinator  
PO Box 128  
Longview, WA 98632  
360-442-5663  
360-442-5979 (fax)

**Please print clearly or type your response. Thank you**

You may file a signed, written complaint up to one hundred and eighty (180) days from the date of alleged discrimination.

**Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**City, State, Zip Code:** \_\_\_\_\_

Telephone Number: \_\_\_\_\_ (home) \_\_\_\_\_ (cell)

Person discriminated against: \_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Please indicate why you believe the discrimination occurred :

\_\_\_\_ Race  
\_\_\_\_ Color  
\_\_\_\_ National origin

What was the date of the alleged discrimination? \_\_\_\_\_



TITLE VI COMPLAINT FORM

Page 2

Where did the alleged discrimination take place?

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Please describe the circumstances as you saw it:

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Please list any and all witnesses' names and phone numbers:

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<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>

What type of corrective action would you like to see taken?

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Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at the address listed on page one (1) of this document.

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Your signature

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Print your name

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Date

## **Appendix B – Sample Communication Tools**



## **NOTICE OF PUBLIC HEARING**

### **CONSIDERATION OF RIVERCITIES TRANSIT AND RIVER CITIES LIFT FARE INCREASES**

#### **COWLITZ TRANSIT AUTHORITY**

NOTICE IS HEREBY GIVEN that a public hearing will be held by the Cowlitz Transit Authority at 4:00 p.m., Wednesday, November 18, 2015 in the Council Chambers at Longview City Hall, 1525 Broadway, Longview, Washington. The purpose of the hearing is to receive any comments concerning a proposal to increase transit fares.

Any person interested may appear and be heard on said matter or may contact staff by telephone, e-mail or in writing, to comment on the proposed fare increase.

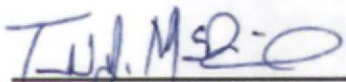
#### **Contact Information:**

RiverCities Transit  
P O Box 128  
Longview, WA 98632  
360.442.5662

[CustomerService@RCTransit.org](mailto:CustomerService@RCTransit.org)

Longview City Hall is accessible for persons with disabilities. Please notify us forty-eight (48) hours in advance at (360) 442-5662 if you will need any special accommodations to attend the meeting.

DATED at Longview, Washington, this 30<sup>th</sup> day of October 2015.

A handwritten signature in blue ink, appearing to read 'Todd McDaniel'.

Todd McDaniel  
Cowlitz Transit Authority

Published: November 4<sup>th</sup> and 11<sup>th</sup>, 2015

HEARING 11-18-2015 Fare Increase

**Notice to Public Posted in Local News Paper**



RiverCities Transit is proposing a fare increase that will affect all routes and services. The new prices are posted in the customer service window inside the Transit Center located at 1135 12<sup>th</sup> Avenue and at [www.rctransit.org](http://www.rctransit.org). Passes (daily, monthly, quarterly, annual) will no longer be offered to ride **RiverCities LIFT**.

If you would like to learn more, RiverCities Transit will be holding the following meetings

**Longview City Hall (2<sup>nd</sup> Floor Council Chambers)  
Monday November 2<sup>nd</sup>, 2015 • 1PM to 3PM**

**Kelso Train Station Meeting Room  
Monday November 2<sup>nd</sup>, 2015 • 5PM to 7PM**

**Cowlitz Transit Authority | Public Hearing  
Longview City Hall (2<sup>nd</sup> Floor Council Chambers)  
Wednesday November 18<sup>th</sup>, 2015 • 4PM**

**[www.rctransit.org](http://www.rctransit.org)**



## Language Implementation Plan Update

The attached plan directs a cross-section of divisions within the transit agency to undertake language assistance activities including the following activities that are recommended in the DOT LEP Guidance on an implementation plan:

1. Identifying LEP individuals who need language assistance.
2. Providing language assistance measures.
3. Training staff.
4. Providing notice to LEP persons of the availability of language assistance.
5. Monitoring and updating the LEP plan.

### Applying Four Factor Analysis

To address federal requirements for assessing needs and providing services to Limited English Proficient (LEP) populations an assessment was based on the Four-Factor Framework outlined in the DOT LEP Guidance:

- Factor 1: Number and proportion of LEP persons served or encountered in the eligible service population.
- Factor 2: Frequency with which LEP individuals come into contact with your programs, activities and services.
- Factor 3: Importance to LEP persons of your program, activities and services.
- Factor 4: Resources available to the recipient and costs.

### Factor 1: Number of and proportion of LEP persons served

Quantitative and qualitative information regarding LEP populations were researched and based on 2020 census:

#### Quantitative Data

Census: analysis of census data showed that the within Longview/Kelso (n = households of 30,866), estimated LEP households (n= 383) represents 1.240% of the total households, with the majority (239) of these households speaking Spanish.

**Qualitative Information** is limited to identification of LEP populations but community-based organizations (social service agencies, faith based, interagency human service organizations, and school districts) suggest that these estimates and residential locations are reliable.

### Conclusions and Recommendations

1. Outreach and communication efforts to LEP persons of Spanish languages needs to be tailored to the urban areas where RiverCities Transit service exists.
2. Given the relatively small number of LEP persons that are encountered within the transit service area more customized training and assistance efforts will need to be made.

## Factor 2: Frequency of contact

There is currently no survey information available providing ethnicity/race data and LEP status. There is currently no comprehensive process in place to routinely capture LEP contact data. Some information is obtained from bus operators and from Customer Service Representatives, but ongoing data gathering to routinely discuss LEP contacts with operators or frontline staff is limited.

**Call Center Data:** RiverCities Transit has two call centers that provided data. RCT did not receive any calls that needed language assistance.

Call Center	Average Calls Per Month	2022 Requests	
		Language Assistance	Language
Customer Service	1,500	0	Spanish
Paratransit	3,000	0	Other
<b>Total</b>	<b>4,500</b>	<b>0</b>	

## Conclusions and Recommendations

1. Due to the lack of a reliable method of recording LEP data, RiverCities Transit should review and find a way to effectively capture and report this data on a regular basis.
2. Interviews with bus operators and other front-line staff indicate an interest in effective training to help employees work with LEP customers. However, it is noted that given how few LEP customers there have been, increasing training initiatives could include multicultural awareness and how to communicate with non-English speaking passengers.

## Factor 3: Importance of LEP Persons of your program, activities, and services

RiverCities Transit shows that “most critical services” fall within Fares, Routes and Schedule and Safety and Security. These areas have been identified because of the more immediate needs that language barriers could have on a customer:

- a) Limit a person’s ability to gain full benefit from services, or
- b) In the areas of safety and security – place a person in physical danger.

While LEP is a recognized component of the needs in the region, it represents a small fraction of actual residential population. However, a couple of items stand out:

- RiverCities Transit frontline staff report that LEP customers experience similar issues that other RiverCities Transit customers face such as: late buses, transfers, fares, and pass-ups.
- LEP customers rely on family, friends, and trusted community organizations to help them adapt.

## Conclusions and Recommendations

1. For LEP customers, resolving customers concerns is hindered by language barriers between them and agency personnel.



2. Reliance on trusted sources for information underlies the small but growing importance of maintaining personal relationships within the LEP communities.

#### Factor 4: Resources available to the recipient and costs

Resources available for language assistance services is identified in the chart below. It should be noted that though RiverCities is providing translated forms, language assistance for LEP customers has for the past few years not been requested.

ITEM	Translation Cost	Print Quantity	Print/Production Cost
Translated web pages	Google & Bing provide this for free		NA
Route Surveys (varies by yr)	0	500	Internal Printing
Youth form, LIFT App, brochures	\$100	2,500	Internal Printing
Total	\$0	3,000	\$0

#### Conclusions and Recommendations

1. Transit agency staff has been proactively seeking ways to assist LEP customers as the need arises. While the current need remains relatively low, it is anticipated that LEP customer base will increase slightly over the next several years. LEP service requests may become more prominent. RiverCities Transit Staff contracts with a translation service to translate forms, brochures, and applications
2. To continue to improve LEP initiatives, the agency will need to direct efforts that deal more directly with the changing ridership demographics
3. To grow the program, new sources of funding may be needed and/or efforts to integrate LEP initiatives into internal processes will need additional support from the agency's management team.

#### LEP Access Plan Implementation Calendar

Efforts to put into place LEP program components are now in the process of being assessed, now that RCT has a better understanding of what the LEP community is here locally and the relatively small number of people needing assistance.



### Capital Projects & Facilities

ITEM	NOW	FY24	FY25
Assess the LEP population in areas affected by any capital facilities	X		
Develop an outreach plan targeting LEP residents and businesses in construction areas.			
Use of in-person interpreter services upon request for public meetings and important events (marketing and Customer Service staff provide notification to the community about availability of interpretive services).	X		
Translate vital documents	X		
Provide notice of language assistance, at no cost, on non-vital yet important outreach documents.	X		

### Legal/Human Resources

ITEM	NOW	FY20	FY21
Develop/review contract language to ensure all contractors providing goods and services are in compliance with Title VI regulations (Title VI of the Civil Rights Act of 1964, Nondiscrimination under Programs Receiving Federal Financial Assistance through the U.S. Department of Transportation")	X		
Determine which documents meet the definition of "vital documents", stay aware of new documents that may be considered "vital".	X		
Develop curriculum and train frontline and other key staff in:	X		
• awareness of type of language services available	X		
• how staff and/or LEP customers can obtain these services	X		
• how to respond to LEP callers	X		
• how to respond to correspondence from LEPs	X		
• how to respond to LEPs in person	X		
• how to document LEP needs	X		
• how to respond to civil rights complaints.	X		
Incorporate LEP plan information into updated employee orientation handbook.		X	

## Marketing/Communications and Customer Services

ITEM	NOW	FY24	FY25
Provide telephone interpretation for basic transit questions and trip planning assistance in virtually any language.	X		
Establish competency standards for interpreters and translators	X		
Draft a policy that states that all interpretation and written translation must be performed by approved vendors/individuals whose competency has been established.		X	
Add a question to Survey to assess respondents' English proficiency and primary spoken language.		X	
Develop a process for determining: <ul style="list-style-type: none"> <li>if a particular document needs to be translated</li> <li>into which languages it should be translated.</li> </ul>		X	
Establish an agency-wide workflow whereby all written translation requests are routed through and managed to ensure consistency.	X		
Translate vital documents, including signage that communicates hazardous pedestrian access in areas of high LEP concentration signage that indicates prohibited behavior in areas of high LEP concentration			X
Place a notice of language assistance, at no cost, on important outreach documents and on website.	X		
Develop formal procedures for documenting the number of requests by LEPs for ticket/pass purchases.		X	
Provide information about complaint process	X		
Identify routes serving areas with high concentrations of LEP individuals.	X		
Create protocol for responding to foreign language correspondence and communication.		X	
Day-to-day administration of LEP program, ensuring compliance and correct implementation.		X	

### Operations

ITEM	NOW	FY24	FY25
Provide training to operators and other frontline employees in LEP policies and procedures.	X		

### Planning

ITEM	NOW	FY24	FY25
Identify areas within the service area that have high concentrations of LEP individuals.	X		
Conduct an evaluation of LEP plan to gauge its effectiveness and determine if updates are needed every two years. assess whether existing language assistance services are meeting the needs of clients with LEP assess whether staff members understand LEP policies and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible seek feedback from LEP communities, including customers and community organizations, about the effectiveness of RiverCities Transit's LEP plan		X	

### Additional Services

ITEM	NOW	FY24	FY25
Provide information online about RCT's LEP services	X		
Provide one-on-one and group travel training to LEPs by working through an interpreter and Travel Trainer.	X		
Establish partnerships and work closely with community organizations that serve LEP populations.	X		
Identify service changes affecting areas with high concentrations of LEP individuals and develop mitigation strategies.			X
Survey staff to determine existing bilingual resources	X		