



ROGUE VALLEY
TRANSPORTATION DISTRICT
TITLE VI PROGRAM

Program Years

August 1, 2014 – July 31, 2017

**ROGUE VALLEY TRANSPORTATION
TITLE VI PROGRAM**

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ROGUE VALLEY TRANSPORTATION DISTRICT TITLE IV PROGRAM

Title VI provides that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

(42 U.S.C. Section 2000d).

I. PLAN STATEMENT

The Rogue Valley Transportation District is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. RVT assures that no person shall on the grounds of race, color, national origin, gender, age or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any RVT service, program or activity. RVT also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. In addition, RVT will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency (LEP).

II. PROGRAM OVERVIEW

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or nation origin in programs or activities receiving federal financial assistance. Presidential Executive Order 12898 addresses environmental justice in minority and low-income populations. Presidential Executive Order 13166 addresses services to those individuals with Limited English Proficiency. These Presidential Executive Orders fall under the umbrella of Title VI. The Environmental Justice Policy Guidance for Federal Transit Administration Recipients (FTA C 4703.1 provides further guidance to incorporate environmental justice principles in plans, projects and activities that receive funding from FTA.

The Title VI Program is responsible for providing leadership, direction and policy to ensure compliance with Title VI of the 1964 Civil Rights Act and environmental justice principles. The Rogue Valley Transportation District is proud of its longstanding policy to ensure that social impacts to communities and people are recognized early and continually throughout the transportation decision-making process to ensure nondiscrimination in all of its programs, activities and services.

III. GOALS AND OBJECTIVES

The Rogue Valley Transportation District (RVTD) has established a Title IV Program in accordance with Department of Transportation regulation 49 CFR Part 21. RVTD is the recipient of federal financial assistance from the Department of Transportation and as a condition of receiving this financial assistance RVTD signed an assurance that it will carry out the program in accordance with requirements of Title IV of the Civil Rights Act of 1964.

The primary objectives of RVTD's Title VI Plan are to:

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

IV. TITLE VI COORDINATOR ACTIVITIES

CONTACT

The Administration Manager has been delegated as the Title VI Compliance Coordinator. In that capacity, the Administration Manager is responsible for implementing all aspects of the Title VI Program. Implementation of the Title VI Program is accorded the same priority as compliance with all other legal obligation incurred by RVTD in its financial assistance agreements with the Department of Transportation.

Any questions or comments regarding this plan should be directed to:

Luanne Spencer, Administration Manager
Compliance Coordinator
Rogue Valley Transportation District
3200 Crater Lake Avenue
Medford, OR 97504-9075
lspencer@rvtd.org
Phone: 541-608-2401
Fax: 541-773-2877

or

Julie Brown, General Manager
Compliance Officer
Rogue Valley Transportation District
3200 Crater Lake Avenue
Medford, OR 97504-9075
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TITLE VI NOTICE TO THE PUBLIC

See Appendix A for the Title VI Public Notice in English and Spanish full text version.

See Appendix B for the Title VI Public Notice in English and Spanish abbreviated version used in the fixed-route and paratransit vehicles.

List of locations where notice is posted:

- All RVTD fixed-route motor bus vehicles
- All RVTD paratransit vehicles
- Within the Administrative Building receptionist lobby
- Within the Valley Lift/Translink receptionist lobby
- Online at www.rvtd.org/riding_rvtd.php

V. PUBLIC PARTICIPATION PLAN

i. REVIEW OF SERVICE CHANGES

RVTD strives to maintain service for transportation disadvantaged populations while improving service for choice riders. Staff works closely with regional agencies and committees that focus on low-income needs, the needs of youth and older adults and the needs of populations with language barriers. These agencies include United Way of Jackson County, ACCESS Community Action Partnership, ARC of Jackson County, Jackson County Community Services Consortium, the Hispanic Interagency Committee and the Hispanic Chamber of Commerce.

RVTD's planned service enhancements are described in full detail in RVTD's Ten-Year Long Range Plan (2007-2017) and Strategic Business Plan (2008). In September 2003 RVTD adopted two trunk routes, Route 10 serving Medford, Phoenix, Talent and Ashland and Route 60 serving Medford and White City; when combined these routes support approximately 75% of the ridership. The Long Range Plan identifies the trunk routes as the base service that would be provided when sufficient funding for other services is not available. The plan then identifies service as it existed in 2006 as the next tier of service to be provided, and finally enhancements that are planned and not yet in service as the next priority.

The ten-year plan was vetted extensively with community groups and jurisdictions prior to adoption by the RVTD Board in 2007. As of 2014, RVTD has not completely fulfilled Tier One of the Long Range Plan due to funding constraints. Service has been added with the Route 24 to east Medford but only with hourly headways (not 30 minute headways as described in the LRP), weekday evening service and Saturday service has been added (again not with the length of hours or headways as described in the LRP) with funding from a 3-year CMAQ grant with service expected to be discontinued in 2015 without sufficient funding.

RVTD is pursuing a 13-cent property tax levy in November 2014 that will sustain current services and provide two additional routes. The routes will expand service in White City and in Medford. Staff used analysis tools to consider impacts to Title VI populations and will continue the analysis prior to service being provided. If the levy is not successful RVTD will enact a service reduction in 2015 and again in 2017 to stay within its current

funding parameters. A service reduction will also require extensive analysis to ensure the reductions are equitable and do not grossly impact Title VI populations.

To conduct the analysis RVTD has begun using the FDOT and CUTR Transit Boarding Estimation Tool (TBEST) which can analyze not only ridership changes due to service availability but also demographics of residents in the service area at the parcel level. RVTD has the capacity to run the model to see the impacts of service changes to certain populations including Title VI populations. The TBEST model was calibrated and put into practice in 2013 with funding provided by ODOT and RVTD. A portion of the work within this Title VI Plan uses the TBEST model, however not all of the Title VI functionality is built into the model at this time. (Due to our present population being under 200,000 and into the foreseeable future through 2030, RVTD did not include this functionality as part of the scope of work for the TBEST build).

A Service Changes Policies and Procedures document was completed in 2008 to provide staff with direction on how to analyze service changes objectively based on performance measures. The plan also provides steps for notifying the public and public hearing procedures. The plan was updated in 2013 to include the TBEST model capabilities for analyzing service changes and to include the process for analyzing how low-income and Title VI populations may be affected by a service change.

Between the years 2011-2014 RVTD has been fortunate to not have discontinued services but actually add service. Service was added in concurrence with the Ten-Year Plan, with the addition of weekday evening hours until 9:00pm on most routes and Saturday service between 8:00am – 4:00pm. The service was added in April 2012 with a 3-year CMAQ grant and will be subject to be discontinued in 2015 without sustainable funding being secured. RVTD is pursuing a 13-cent property tax levy in the November 2014 election and if successful will sustain the evening and Saturday hours and add two additional routes.

ii. PLANNING ACTIVITIES COMPLETED DURING 2011-14 REPORT PERIOD

1. In November 2011 RVTD completed the onboard passenger survey through a contract with ODOT with a company called NuStats. This company did a thorough job with preparing the survey and collecting representative data. RVTD requested the consultant to make greater efforts to engage the Latino community which has had disproportionate involvement in previous onboard surveys. To accomplish this, the consultant hired a bilingual surveyor and as in the past made the survey instrument in Spanish as well. What the surveyors found is the majority of Hispanic passengers were able to complete the English version and LEP riders did not want to participate even with a Spanish version.
2. Update of the Coordinated Human Services Public Transportation document, “United We Ride Plan 2013-2018”. The planning process engaged several focus groups to hear feedback including La Clinica who serves Latino populations, Veterans Affairs, major employers such as Harry and David and involved a steering committee who represented older adults, people with disabilities and low-income.

3. The 2011 RVTB District Boundary Assessment to look at whether areas on the fringes of the district boundary have become urbanized and could support transit services. RVTB identified the community of Eagle Point as being ready to support transit. A follow up Eagle Point Transit Study was completed in 2012-2013 that collected Census data of the population to find concentrations of low-income, older adults, youth and people with disabilities. The analysis did not examine minorities or LEP populations. The City must annex into the district to receive service. This issue will also be on the November 2014 ballot and if successful RVTB will begin service in 2015, which will require a public hearing and complete the LEP analysis in accordance with our service changes policies.
4. RVTB is considering implementing High Capacity Transit service (express service near term, BRT-light long-range) on corridors that have high ridership and schedule adherence issues. In 2013-2014 RVTB partnered with the University of Oregon Community Planning Workshop to conduct a public engagement process to see if the community considers HCT as a priority for RVTB to pursue. The project involved the entire community through an online survey that was available for nearly 3 months and seven focus groups which included minorities, older adults and youth in addition to 15 Key Person interviews. Generally there was strong support for pursuing HCT from all groups that were involved.
5. Additionally RVTB created a 30-second Spanish commercial that airs on the two prominent Hispanic stations in the Rogue Valley.

iii. ANTICIPATED PLANNING ACTIVITIES 2014-2017

2015	2016	2017
<ul style="list-style-type: none"> • Triennial Onboard Passenger Survey 	<ul style="list-style-type: none"> • Begin Ten-Year Plan update (2017-2027) • Valley Feeder (DR) public service planning 	<ul style="list-style-type: none"> • Adopt Ten-Year Long Range Plan (2017-2027) • Establish Valley Feeder (DR) public service

iv. ANALYSIS OF CONSTRUCTION PROJECTS

RVTB has not undertaken any construction projects during the reporting period. RVTB is familiar with and has used Chapter IV, Section 8, Guidance on Conducting an Analysis of Construction Projects, components a-f.

v. SERVICE STANDARDS

Section 4 – Title VI Plan: System-wide Service Standards

Pursuant to requirements set forth in The Federal Transit Administration’s (FTA) Circular 4702.1B RVTB must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service. In some cases, these standards differ from standards used by RVTB for other purposes.

The FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers set these standards; therefore, these standards will apply to each individual agency rather than across the entire transit industry:

- 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.

RVTD calculates Vehicle Load Factor by dividing the average peak passenger load on each route by the number of seats on the type of bus typically assigned to that route. Vehicle Load Factor is monitored regularly to ensure customer comfort and to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns. Vehicle Load Factor standards are presented in the exhibit below.

EXHIBIT 1:

Route	Weekday load factor	Saturday Load Factor
1	0.17	0.19
2	0.24	0.27
10	0.39	0.52
24	0.18	0.20
30	0.12	0.14
40	0.23	0.26
60	0.36	0.40

B. VEHICLE HEADWAYS

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

RVTD calculates headway by determining the average length of time between buses on each route during peak and off-peak times. In the event a route regularly exceeds Vehicle Load Factor standards, RVTD will evaluate whether frequency on that route should be adjusted within the confines of existing or expected funding levels. Vehicle headway standards are presented in the exhibit below

EXHIBIT 2:

Route	Weekday headway	Saturday headway	
1		60	60
2		30	60
24		60	60
30		72	78
40		30	60
60		30	60
10		23	60

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 Category 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.

A bus is determined to be late if it departs its scheduled “time point” five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure. It is RVTDS’ goal to be on-time at least 95 percent of the time. Bus Transportation staff also 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 four times annually. On-time performance standards are presented in the exhibit below:

EXHIBIT 3:

Route	Weekday Percentage Late	Saturday Percentage Late
1	21%	28%
2	14%	14%
10	38%	39%
24	29%	28%
30	27%	30%
40	36%	39%
60	20%	24%

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.

RVTD measures service availability using the Transit Boardings Estimation and Simulation Tool (TBEST). TBEST features a Title IV toolset which includes a series of ‘service availability’ reports. RVTD’s transit network was built into the TBEST modeling environment, which includes Census 2010 and American Community Survey 5 –year estimates projected to 2013.

The RVTB District Boundaries serve as the primary analysis area. RVTB also defined a market capture distance of .25 miles around each route, which serves as the secondary boundary for the analysis. Exhibits 4 and 5 below show the composition of minority population and low income households within the boundaries.

EXHIBIT 4:

System Area	Total Population Affected	Total Minority Population Affected	Percent Minority	Total Households Affected	Total Low Income Households Affected	Percent Low Income Households
RVTB Boundary	152,380	20,097	13.20%	63,639	17,161	27.00%
.25 mile around routes	49,400	8,136	16.50%	21,294	7,343	34.50%

EXHIBIT 5:

Route	Total Population Affected	Total Minority Population Affected	Percent Minority	Total Households Affected	Total Low Income Households Affected	Percent Low Income Households
1	9,510	1,444	15.20%	4,226	1,467	34.70%
2	9,326	1,892	20.30%	3,560	1,291	36.30%
10	31,141	3,996	13%	14,377	4,272	29.70%
24	3,255	474	14.60%	1,467	467	31.80%
30	2,209	545	24.70%	996	534	53.50%
40	5,407	1,003	19%	2,224	918	41.30%
60	7,707	1,592	20.70%	2,781	683	24.60%

vi. SERVICE POLICIES

RVTB adopted a service policy in 2006 and reads as follows:

**STANDARD OPERATING PROCEDURE
OBTAINING PUBLIC COMMENT ON FIXED-ROUTE SERVICE CHANGES
EFFECTIVE SEPTEMBER 2006**

The Rogue Valley Transportation District (RVTB) will provide an opportunity for public comment on any proposed changes in the fixed-route service that falls within described criteria: *Any change in fixed-route service that is greater than five (5) percent of any fixed-route's annual revenue hours.*

The public will be given an opportunity to comment on proposed changes at **two** public hearings scheduled in conjunction with regularly monthly Board meetings prior to implementing any intended change in the fixed-route service. A notice of the public hearing will be placed in a newspaper of general circulation, specifying the date, time and location of the meeting and the nature of the change or changes being proposed. Members of the public who are unable to attend the public

hearing are encouraged and directed to submit their concerns in writing to the General Manager.

All comments made at the public hearings are recorded in written minutes of the Board meeting. Members of the public who submit comments in writing are sent a letter of acknowledgement and then their comments are forwarded to the appropriate RVTD staff member(s) and the Board of Directors. All comments are reviewed and given full and careful consideration by both RVTD staff and the Board prior to implementing any and all proposed changes in the fixed-route service.

VII. LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Limited English Proficiency (LEP) is a term used to describe people who do not speak English as their primary language and who also may have limited ability to read, write, or understand English.

AUTHORITY AND GUIDANCE

Presidential Executive Order (EO) 13166 – Improving Access to Services for Persons with Limited English Proficiency (LEP) is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Discrimination in providing services to LEP persons is covered in Title VI under national origin discrimination.

The 1987 Civil Right Restoration Act broadened the coverage of Title VI to include all of the federal fund recipient's programs and activities, whether they are federally funded or not. These requirements filter down through RVTD to all sub-recipients, contractors, consultants and agents doing business on behalf of RVTD.

EO 13166 states that recipients must provide LEP persons an equal opportunity to benefit from and ensure meaningful access to its programs and services that are normally provided in English.

The following federal publications provide implementing guidance:

- US Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, Federal Register/Vol. 70, No. 239/December 2005.
- US Department of Justice Policy Guidance, Enforcement of Title VI of the Civil Rights Act of 1964-National Origin Discrimination Against Persons With Limited English Proficiency, Federal Register/Vol. 65, No. 159, August 2000, www.usdoj.gov/crt/cor
- US Department of Justice Clarifying Memo dated October 26, 2001. www.usdoj.gov/crt/cor/lep/Oct26/

FOUR FACTOR ANALYSIS

A recipient may conduct an individualized assessment that balances the following four factors:

1. The number or proportion of LEP persons served or encountered in the eligible service population ("served or encountered" includes those persons who would be served or encountered by the recipient if the persons received adequate education and outreach and the recipient provided sufficient language services);
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the program, activity, or service provided by the program; and
4. The resources available and costs to the recipient.

Summary of Findings:

The Rogue Valley Transportation District (RVTD) provides public transportation services for the greater Jackson County area with a population of 208,545. Jackson County, The American Community Census 1-year estimates for 2013 show that 11.7 % or 24,386 of the residents of Jackson County identified themselves as being of Hispanic or Latino origin. Of those 24,386 individuals, 5,972 identified themselves as speaking English "less than well" or 24.4% of the Latino population. The 2011 passenger Survey found that 9.3% of passengers are of Hispanic ethnicity. The effort and resources to reach person with limited English proficiency is minimal compared to the day to day cost of providing service.

FACTOR 1

The table below provides data on the total Hispanic population within Jackson County from the ACS 2013 1-year estimates.

2013 American Community Survey 1-Year Estimates

HISPANIC OR LATINO				
Total Population	208,545	*****	208,545	(X)
Hispanic or Latino (of any race)	24,386	*****	11.7%	*****
Mexican	21,478	+/-1,233	10.3%	+/-0.6
Puerto Rican	1,044	+/-1,048	0.5%	+/-0.5
Cuban	0	+/-200	0.0%	+/-0.1
Other Hispanic or Latino	1,864	+/-797	0.9%	+/-0.4

The American Community Survey 5-Year Estimates provides information about the various ethnicities living in Jackson County with Limited English Proficiency (Appendix B), defined as speaking English less than well. As of the 2014 Title VI Report, community members who speak Spanish and do not speak English very well has risen to 5,972 people (see table below). Of the total 191,672 total estimated population during this ACS the Spanish LEP is 3.1%. Spanish speaking very well and less than very well combined is 7.4% of the total population. (Other ethnicities having LEP but are less than 200 persons are French, Chinese and Vietnamese).

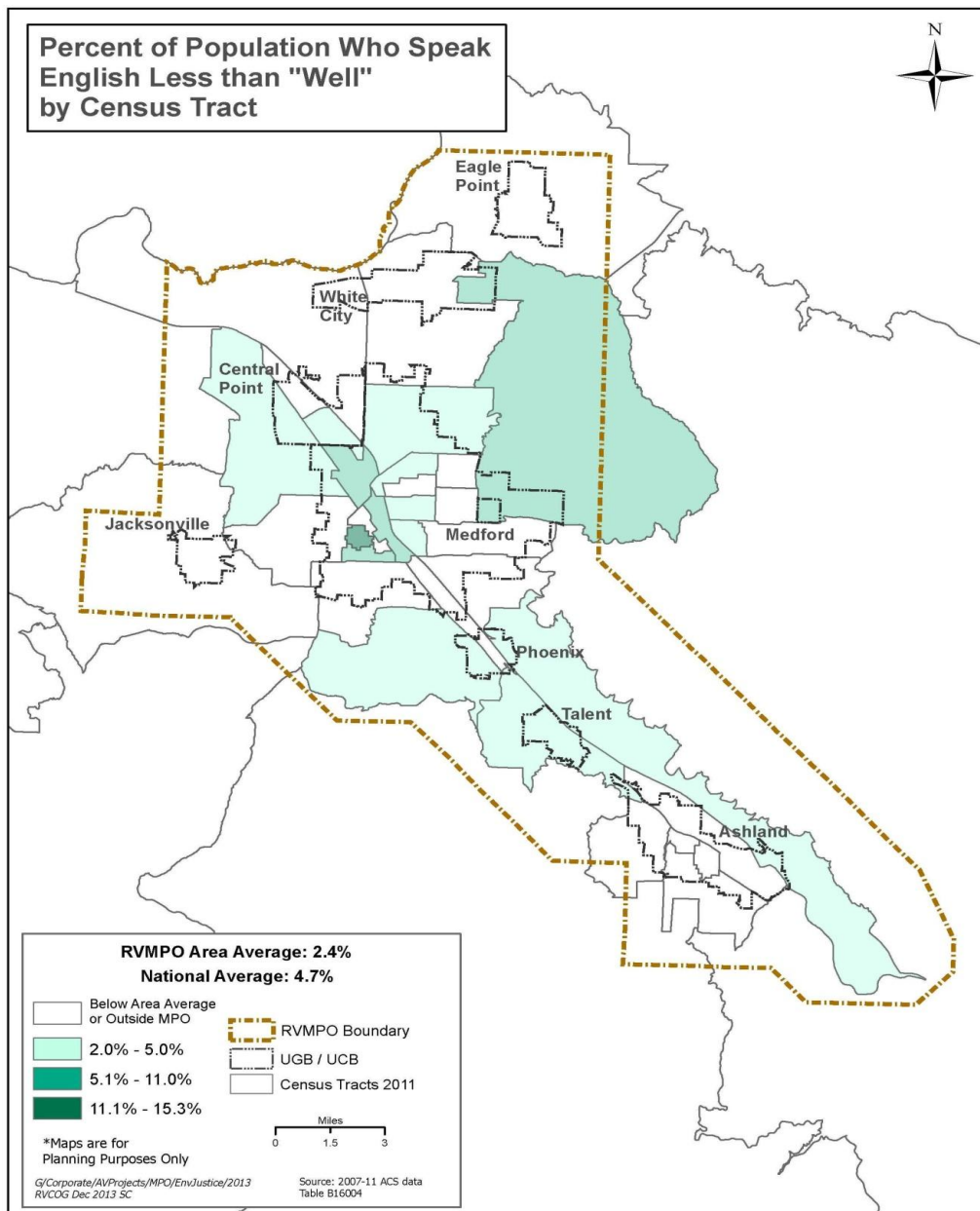
A portion of the map information was provided by the Rogue Valley Metropolitan Organization for the MPO Title VI update adopted in August 2014.

LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

2008-2012 American Community Survey 5-Year Estimates

	Jackson County, Oregon	
	Estimate	Margin of Error
Total:	191,672	*****
Speak only English	173,541	+/-1,081
Spanish or Spanish Creole:	14,103	+/-920
Speak English "very well"	8,131	+/-695
Speak English less than "very well"	5,972	+/-665

Map 1: Limited English Proficiency Population (RVMPO 2014)



FACTOR TWO

Rogue Valley Transportation District's on board passenger survey final report dated 2011 indicates that 9.3% of its transit passengers are of Hispanic origin and that the Route 30 which operates in the central core of Medford has the largest Hispanic ridership at 16.5% (see chart below). The second most used route by persons of Hispanic origin is Route 40 which serves north Medford and the City of Central point.

Table 3.17: Ethnicity by Route (Multiple Response)*

Route	Ethnicity						Total
	Asian	Black/African American	Hispanic	Native American	White	Other	
1	2.1%	4.8%	4.2%	5.7%	84.9%	1.4%	100.0%
2	.6%	4.2%	6.0%	5.1%	88.0%	4.3%	100.0%
10	1.2%	4.0%	7.1%	10.5%	77.6%	4.0%	100.0%
24	.0%	1.6%	11.3%	7.7%	85.9%	4.4%	100.0%
30	2.3%	.0%	16.5%	9.0%	68.8%	12.4%	100.0%
40	.0%	1.3%	15.9%	6.2%	77.7%	10.0%	100.0%
60	2.7%	3.9%	10.5%	3.9%	81.2%	4.8%	100.0%
Total	1.3%	3.5%	9.3%	7.6%	79.8%	5.2%	100.0%

**Percentages may not add up to 100 percent per category due to multiple responses.*

Using the TBEST model RVTD has also analyzed minority and low-income households in the vicinity of each route. Three of RVTD's seven routes have minority households at or above 20% of total households served. Additionally 16.5% of the population within .25 mile of the RVTD transit service is minority. (The RVTD version of TBEST does not have the functionality to address LEP specifically). A table with this information is below.

Route	Total Population Affected	Total Minority Population Affected	Percent Minority	Total Households Affected	Total Low Income Households Affected	Percent Low Income Households
1	9,510	1,444	15.20%	4,226	1,467	34.70%
2	9,326	1,892	20.30%	3,560	1,291	36.30%
10	31,141	3,996	13%	14,377	4,272	29.70%
24	3,255	474	14.60%	1,467	467	31.80%
30	2,209	545	24.70%	996	534	53.50%
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60	7,707	1,592	20.70%	2,781	683	24.60%

System Area	Total Population Affected	Total Minority Population Affected	Percent Minority	Total Households Affected	Total Low Income Households Affected	Percent Low Income Households
RVTD Boundary	152,380	20,097	13.20%	63,639	17,161	27.00%
.25 mile around routes	49,400	8,136	16.50%	21,294	7,343	34.50%

FACTOR THREE

RVTD is the only public transportation provider in Jackson County. RVTD provides an average of 4 million trips per year and operates Monday through Friday 5am to 9pm and Saturday 8am to 4pm. The transit service is an effective way to get to employment, medical appointments, shopping trips and for higher education. The majority of passengers are low-income and do not own a vehicle making transit a dependable transportation option.

FACTOR FOUR

The decision to provide language assistance services should include an assessment of the number or proportion of LEP persons from a particular language group served or encountered in the surrounding community area. The greater the number or proportion of LEP persons served or encountered, the more likely language services are needed. Generally, identifying any community where the LEP population equals 5 percent or more in a given language automatically triggers providing language assistance services as a mandatory and normal part of a program's operation. RVTD's target population for LEP services is Hispanic and Latino.

To comply with federal regulations (Executive Order 13166) to "Improve Access to Services for Persons with Limited English Proficiency" by providing meaningful access to the benefits, services, information, and other important portions of Rogue Valley Transportation District programs and activities for individuals with limited English proficiency.

- Translate "vital documents" into Spanish, and if necessary, replace text with pictograms or universal icons if economically feasible.

- Notify the Spanish-speaking population of the availability of free translation and interpretation services, upon request, for non-vital but important documents and information.
- Identify service changes that affect areas with high concentrations of LEP persons and develop mitigation strategies.

To develop programs and materials to educate both community leaders who serve Spanish speaking LEP populations and LEP community members about RVTD's services and programs.

- Contact LEP partners to determine culturally appropriate travel-training materials and contact methods for members of their specific communities.
- Using input from community leaders, develop and provide customer orientation to familiarize transit coordinators at community centers and LEP customers with all RVTD services and programs.
- Gather community input for designing new pictograms to replace the text in signage where possible.

To educate RVTD staff regarding LEP programs and policies.

- Work with the Operations Department training staff to improve bus operator training programs related to transporting and communicating with LEP customers.

GENERAL STRATEGY

This program will utilize existing networks within the Spanish-speaking community to contact, engage, and educate community leaders serving Spanish-speaking LEP populations and LEP community members about RVTD's services and programs. These include: community based organizations (CBO's), churches, social clubs, business organizations and state, county and city social service agencies.

Primary Target Audience: New immigrants whose primary language is Spanish and who read at least some Spanish.

Members of this group vary in age, education, and income. However, they tend to live in urban or suburban settings, have access to RVTD services, have low incomes, and are transit dependent. Ridership patterns include men and women commuting to work and school, men and women taking children to school and medical appointments, youth riding to school and jobs, and the elderly going to medical appointments and social activities.

Secondary Target Audience: Recent immigrants from rural areas of Mexico, Central America, and South America. This group is noteworthy because they comprise much of the recent Latino population growth.

Internal: RVTD management and staff needing to communicate with the Spanish-speaking LEP community regarding legal, service, and ridership issues.

External: Spanish-speaking LEP communities; community-based organizations (CBOs) serving Spanish-speaking LEP populations; Rogue Community College; and state, county and city governments serving Spanish-speaking LEP populations.

PROGRAM ELEMENTS

Outreach – External Stakeholders:

- CBOs serving Spanish-speaking LEP populations
- Urban Spanish-speaking LEP communities
- Rural Spanish-speaking LEP communities
- Hispanic Interagency Committee
- Hispanic Chamber of Commerce
- State, county, and city governments
- Bilingual RVTD staff person at public hearings, open houses, and other service outreach activities when available or upon request

Outreach – Internal Stakeholders:

- Employee training
- Service and scheduling
- Capital projects
- Board of Directors

Media –

- Include Spanish when promoting RVTD services in all forms of media when financially feasible

Training – RVTD Employees and Contracted Service Employees –

- Provide employee training (initial focus on front-line staff: bus operators, customer service/dispatch agents, reception).
- Provide staff with a description of the language assistance services offered by RVTD.
- Offer basic/functional Spanish classes for employees.
- Provide staff with specific procedures to be followed when serving a LEP customer, including how to handle a potential Title VI/LEP complaint.

Translation Service –

- Use of ‘I Speak’ card to ascertain language assistance needs (Attachment C)
- In house oral and written translation services
- In house telephone interpreter
- Google website translation service

Recruit/Hire Bilingual/Bicultural Individuals –

- Place job announcements at the state employment office, in local newspapers, on RVTD’s website, in e-mail notifications, and any other medium used to attract potential employees, encouraging bilingual (English/Spanish)/bicultural individuals to apply.

PROVIDING LANGUAGE ASSISTANCE

Some options for providing language assistance are:

- Bilingual staffing
- Telephone interpretation

- Volunteer interpreters from community minority organizations
- Qualified paid interpreters
- Use of 'I Speak' cards to identify language
- Translation of vital documents

RVTD has not had any prior requests for translation or interpretation assistance and none thus far during this reporting period.

LANGUAGE ASSISTANCE RESOURCES/TRANSLATION OF VITAL DOCUMENTS

Rogue Valley Transportation District currently has the following resources available to provide meaningful access to RVTD services and programs by persons with LEP:

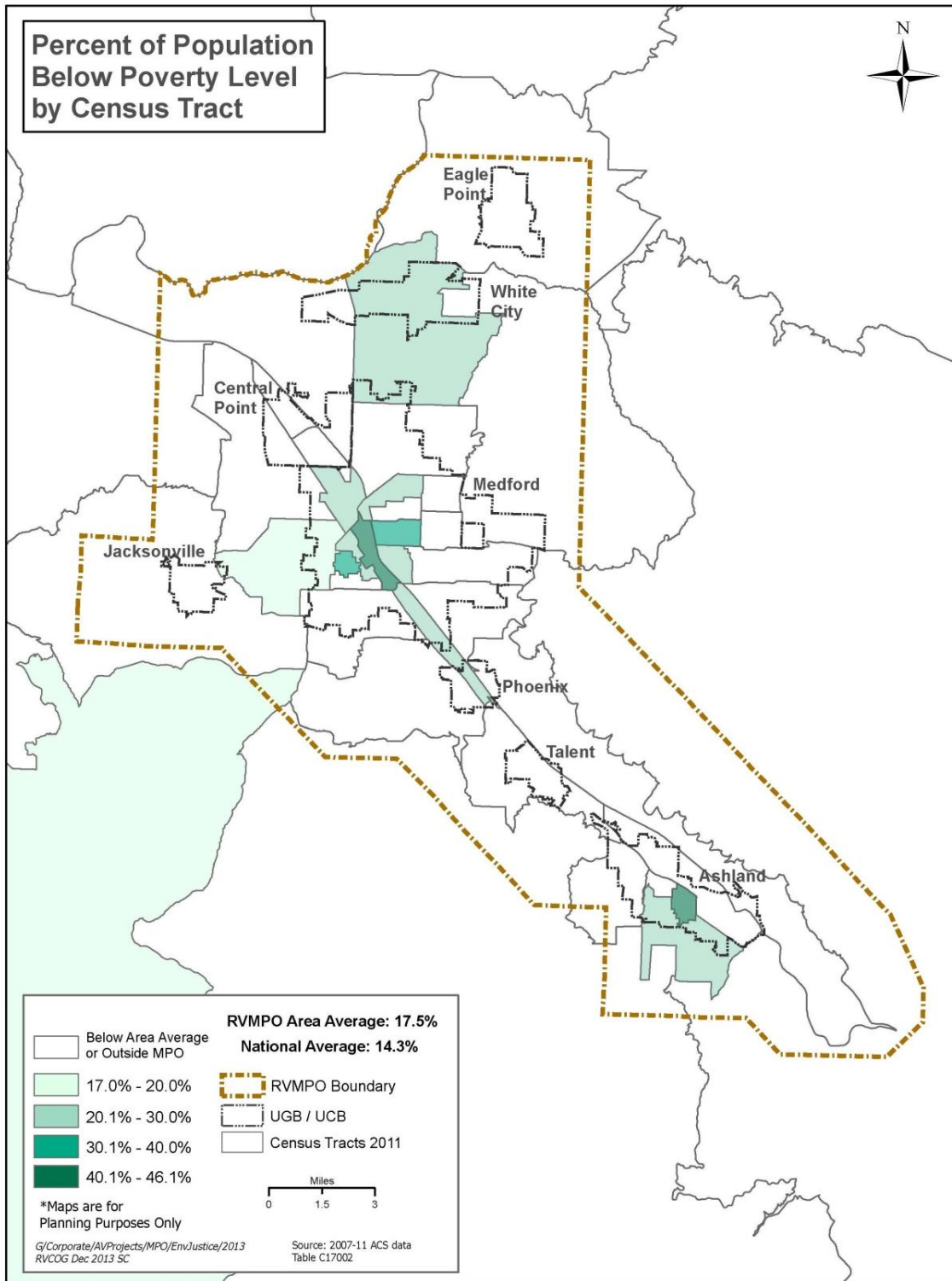
- Bilingual staffing in two RVTD's locations
- Automated Bus Route Schedule Information (24 hours) in English/Spanish
- Automated telephone Information for Valley Lift paratransit service, Rideshare, Carpool, Vanpool and Bikes on Buses in English/Spanish
- Bus Riding Rules and Bus Safety information posted inside all buses in English and Spanish
- Printed materials available in English/Spanish: Bus Schedules (to include fare information), ODOT Bicycle Manual, Bicycle Helmet Fitting Brochure, Bicycle Safety, Safe Walk to Schools information, Title VI Complaint Form and Procedures (Attachment A) and Public Notice of a Person's Rights under Title VI of the Civil Rights Act of 1964 (Attachment B)
- Rogue Valley Transportation District services published in Hispanic Telephone Directory
- Membership in the Hispanic Chamber of Commerce

Rogue Valley Transportation District's on board passenger survey final report dated 2011 indicates that 9.3% of its transit passengers are of Hispanic origin and that the Route 30 which operates in the central core of Medford has the largest Hispanic ridership at 16.5% (see chart below). The second most used route by persons of Hispanic origin is Route 40 which serves north Medford and the City of Central point.

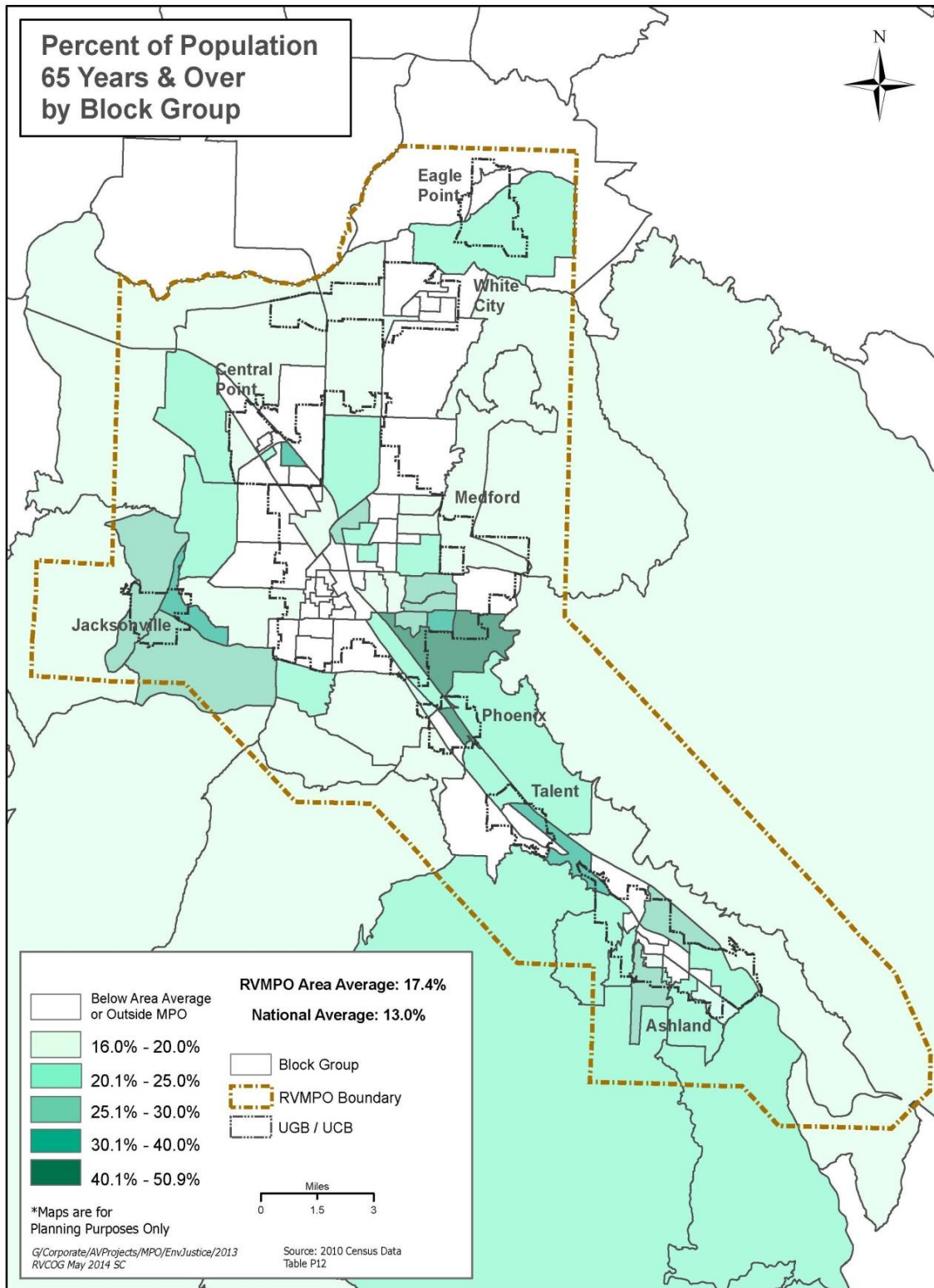
ADDITIONAL INFORMATION FOR TITLE VI POPULATIONS

(Maps provided by the Rogue Valley Metropolitan Planning Organization (RVMPO) for the MPO Title VI Plan.)

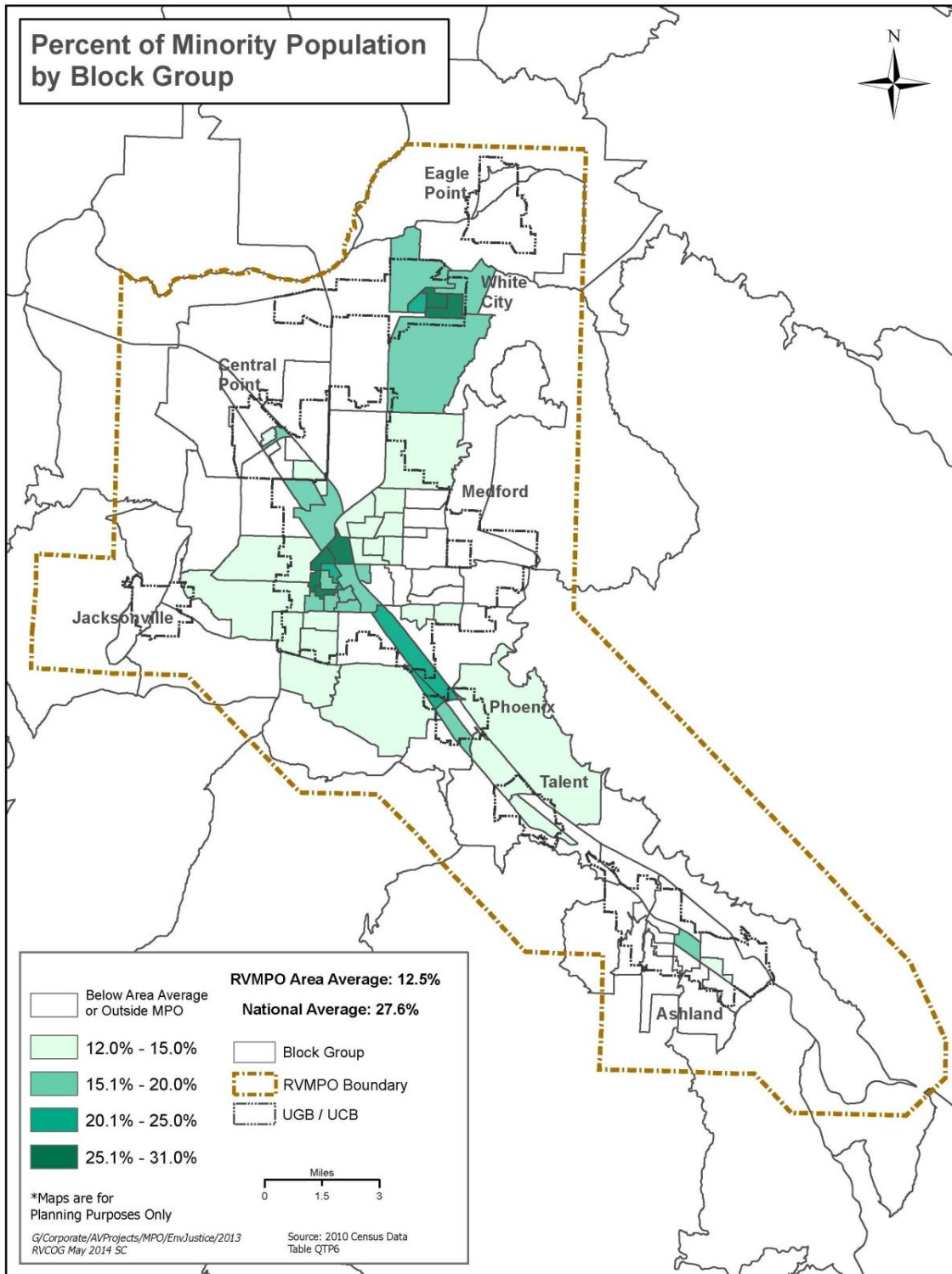
Map 1: Population Living Below the Poverty Level



Map 2: Senior Population



Map 3: Minority Population



MONITORING AND UPDATING THE LEP PLAN

This plan is designed to be flexible and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons and it will be important to monitor changes in demographics and types of services as new census information becomes available.

RVTD will update the LEP Plan as required by the U.S. DOT. At a minimum, the plan will be reviewed and updated every three years as required, or when it is clear that higher concentrations of LEP individuals are present in the RVTD service area.

VIII. DISSEMINATION OF LEP PLAN

RVTD will post the LEP Plan, complaint procedures and complaint form on its website at www.rvtd.org. A copy of the Public Notice Concerning Title VI of the Civil Rights Act will be posted in English and Spanish at the District's Front Street bus transfer station, in the receptionist lobby of the Administration and TransLink buildings, and on all District buses and Paratransit vehicles (Attachment B). Copies of the Title VI Plan will be provided to District staff and to any person or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request.

SCHEDULE PROGRAM ELEMENTS – ACTION AND PRELIMINARY TIMELINE

2015	2016	2017
<ul style="list-style-type: none">• Continue to evaluate and monitor existing plan and activities (ongoing)• Begin to develop a more comprehensive LEP training program for new drivers• Continue to encourage bilingual/bicultural individuals to apply for job openings	<ul style="list-style-type: none">• Continue to monitor existing plan and activities (ongoing)• Develop procedures for effective telephone communication between staff and LEP person• Incorporate LEP information into RVTD employee handbook	<ul style="list-style-type: none">• Continue to monitor plan and activities (ongoing)• Continue to provide media in Spanish• Insertion of notices in Spanish regarding access to free interpreters and other language assistance in RVTD information disseminated to the public and staff

IX. TITLE VI COMPLAINTS

RVTD has had no Title VI civil rights complaints during the previous reporting period and thus far during the current reporting period.

ATTACHMENT A

ROGUE VALLEY TRANSPORTATION DISTRICT (RVTD) **NONDISCRIMINATION COMPLAINT PROCEDURES**

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program or activity administered by RVTD or its sub-recipients, consultants and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that **does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.**

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title IV Compliance Officer may be utilized for resolution, at any stage of the process. The Title VI Compliance Officer will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

Procedures.

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by title IV nondiscrimination provisions may file a written complaint within 180 calendar days of the alleged occurrence or when the alleged discrimination became know to the complainant. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s).
 - b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individual perceived as parties in the complained-of incident.
 - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. **The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for RVTD to be able to process it.**
 - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing. **A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to RVTD for processing.**
2. Upon receipt of the complaint, the Title VI Compliance Officer will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against of RVTD's sub-recipients of Federal funds, RVTD will assume jurisdiction and will investigate and adjudicate the case. Complaints against RVTD will be referred to the Federal Transit Administration, Office of Civil Rights, for proper disposition pursuant to their procedures.

3. In order to be accepted, a complaint must meet the following criteria:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
 - b. The allegation(s) must involve a covered basis such as race, color, or national origin.
 - c. The allegation(s) must involve a program or activity of a Federal-aid recipient, sub-recipient, or contractor.
4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
5. Once RVTD decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven (7) calendar days. The complaint will receive a case number and will then be logged into RVTD's records identifying its basis and alleged hard.
6. In cases where RVTD assumes the investigation of the complaint, RVTD will provide the respondent with the opportunity to respond to the allegation(s) in writing. The respondent will have ten (10) calendar days from the date of RVTD written notification of acceptance of the complaint to furnish his/her response to the allegation(s).
7. RVTD's final investigative report and a copy of the complaint will be forwarded to the Federal Transit Administration, Office of Civil Rights, and affected parties within sixty (60) calendar days of the acceptance of the complaint.
8. RVTD will notify the parties of its final decision.
9. If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of the right to appeal to the Federal Transit Administration, Office of Civil Rights, 915 Second Avenue, Suite 3142, Seattle, WA 98174-1002.

Title VI Complaint Form (cont.)

List names and contact information of persons who may have knowledge of the alleged discrimination:

Have you filed this complaint with any other federal, state, or local agency, or with a federal or state court? Check all that apply.

Federal Agency _____ Federal Court _____
State Agency _____ State Court _____
Local Agency _____

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

Name: _____
Address: _____
City/State/Zip: _____
Telephone Number (Work): _____

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

Complainant Signature Date

Attachments: Yes _____ No _____

Submit form and any additional information to:

Rogue Valley Transportation District
Title VI Compliance Officer
3200 Crater Lake Avenue
Medford, OR 97504-9075
Phone: (541) 779-5821
Fax: (541) 773-2877

If you need this information in another language, contact (541) 779-5821, Ext. 1401. *Si necesita información en otro idioma, favor de llamar al (541) 779-5821, Ext. 1401.*

ATTACHMENT B



ROGUE VALLEY TRANSPORTATION DISTRICT

Public Information Concerning Title VI of the Civil Rights Act of 1964, as amended

Rogue Valley Transportation District (RVTD) is the recipient of Federal funding to provide public transportation. RVTD operates programs subject to the nondiscrimination requirements under Title VI.

The following examples, without being exhaustive, illustrate the application of the nondiscrimination provisions of the part to projects receiving Federal financial assistance under the programs of certain Department of Transportation operating administrations.

- Any person who is, or seeks to be, a patron of any public vehicle which is operated as a part of, or in conjunction with, a project shall be given the same access, seating, and other treatment with regard to the use of such vehicle as other persons without regard to their race, color, national origin, age, gender or disability.
- No person who is, or seeks to be an employee of the project sponsor or lessees, concessionaires, contractors, licensees, or any organization furnishing public transportation service as a part of, or in conjunction with, the project shall be treated less favorably than any other employee or applicant with regard to hiring, dismissal, advancement, wages, or any other conditions and benefits of employment, on the basis of race, color, national origin, age, gender or disability.
- No person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, national origin, age, gender or disability.
- The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin, age, gender or disability.

The following Title VI information/documents are available on the District's website or upon request: RVTD's Title VI Policy and Program, FTA Circular 4702.1A, 49 CFR Part 21. To obtain Title VI information/documents, please call (541) 779-5821 or visit www.rvtd.org.

Individuals or organization who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color, national origin, age, gender or disability by Rogue Valley Transportation District (RVTD) can file an administrative complaint with RVTD and/or the Federal Transit Administration's Office of Civil Rights under Title VI of the Civil Rights Act of 1964. Individuals and organizations may file a complaint by completing the Title VI complaint form. A copy of the complaint form and procedures can be found on the District's website at www.rvtd.org or by calling (541) 779-5821.