

~ NOTICE OF MEETING ~
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS MEETING
2910 East Fifth Street Austin, TX 78702

~ Agenda ~

Monday, June 28, 2021

12:00 PM

Capital Metro Rosa Parks Boardroom

I. Public Comment:

II. Advisory Committee Updates:

1. Access Advisory Committee
2. Customer Service Advisory Committee (CSAC)

III. Board Committee Updates:

1. CAMPO update
2. Austin Transit Partnership update

IV. Action Items:

1. Approval of minutes from the April 26, 2021 board meeting and May 12, 2021 public hearing.
2. Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract with Kimley-Horn and Associates, Inc for environmental review services pursuant to Section 139(j) of title 23, U.S. Code in an amount not to exceed \$1,226,502.
3. Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract with Sirius Computer Solutions, Inc. to replace network infrastructure technology in an amount not to exceed \$234,059.
4. Approval of a resolution adopting the Revised Title VI Policies and approving the Title VI Service Monitoring Results, and approval of submission of the Triennial Title VI Program Update to the Federal Transit Administration..
5. Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract for benefits, compensation and retirement consulting services with Gallagher Benefits Services, Inc., in an amount not to exceed \$953,400.
6. Approval of a resolution appointing Catherine Walker, Chief Financial & Risk Officer, to the Capital Metro Investment Committee as an investment officer, with the authorization to withdraw, invest, reinvest, and accept payment with interest, consistent with the investment policy.

V. Presentations:

1. Initial Review and Discussion of FY2022 Budget
2. August 2021 Service Changes
3. Sustainability Climate Plan
4. Public Transportation Agency Safety Plan (PTASP) Annual Review
5. Project Connect Orange Line Update

VI. Reports:

1. President's Report

VII. Items for Future Discussion:

VIII. Adjournment

ADA Compliance

Reasonable modifications and equal access to communications are provided upon request. Please call (512) 369-6040 or email ed.easton@capmetro.org if you need more information.

BOARD OF DIRECTORS: Wade Cooper, Chair; Jeffrey Travillion, Vice Chair; Eric Stratton, Secretary; Terry Mitchell; Ann Kitchen, Leslie Pool and Pio Renteria.

The Board of Directors may go into closed session under the Texas Open Meetings Act. In accordance with Texas Government Code, Section 551.071, consultation with attorney for any legal issues, under Section 551.072 for real property issues; under Section 551.074 for personnel matters, or under Section 551.076, for deliberation regarding the deployment or implementation of security personnel or devices; arising regarding any item listed on this agenda.

Access Advisory Committee
Wednesday, May 5th, 2021
TEAMS
5:30 p.m. – 7:03 p.m.

Call to Order:

Chair Chris Prentice, Access Advisory Committee

Chairman Prentice called the meeting to order at 5:33 p.m.

Introductions:

Committee members present were John McNabb, Chris Prentice, Audrea Diaz, Mike Gorse, Andrew Bernet, Paul Hunt

Capital Metro staff and contractors present were: Martin Kareithi, Jo Anne Ortiz, Chad Ballentine, Kevin Conlan, James Bush

Citizens' Communication

Members of the public

Audrea – Wants to know what is being done about social distancing on the vehicles. Chad – We haven't opened our vehicles back up to full capacity yet. We are monitoring the return of riders.

Paul – Booked a ride Sunday with 2 people & 2 dogs. The dogs were left off the manifest. Is this a systemic problem?

CAC Committee meeting

The main topic of the meeting was the \$300 million for anti-displacement program. Jo Anne explained the meeting was more for getting to know each other and as the meetings move forward the

Project Connect/ATP Update

Yannis Banks Community Engagement Coordinator

Yannis talked about joining the working groups for the Orange & Blue Line. Chris asked about what funding from the feds have we received already. Yannis – We were included in POTUS FY22 FTA Budget request for our 2 new MetroRapids. Paul – You mentioned a Tech Ridge working group, is rail going up there. Yannis – No, not yet. We want to build it out eventually, but they will get a better MetroRapid service until we can. We want to make sure we are including them in the conversations.

Budget Update

Kevin Conlan, Deputy CFO

Our budget is looking closer to being back to normal pre-covid. We will present the budget proposal to Access and CSAC in August. We normally would go out to our busiest transit

stations and do a presentation, but we are still monitoring if we will do that. There will not be a fare increase proposed for fiscal year 2022. Our freight railroad revenue is on track to what was budgeted. There will be additional frequency on 1, 7, 10, 20 and 300. Chris – How would Leander leaving impact CapMetro if that occurs? Kevin – Leander contributes about 6 million to our budget so it is not too large. We are providing about \$9 million worth of service. Of course, we don't want to see them leave, it is a great connection that we have up there. Our wish is that they won't withdraw.

Brand Refresh Study

Brian Carter, EVP Chief Experience and Engagement Officer

We will be looking to update everything with our brand on it, including our uniform pieces. We have a great brand reputation now. Our brand is more than just the logo, but to what we do in the community. It's our whole reputation. We have sent you a survey to get what you think & feel about CapMetro to help us get a good barometer on that. This will not be a complete brand refresh. We have a lot of great brand equity that we want to keep. Things like our mission & vision will be relatively unchanged. We are looking to do some minor tweaks. Chris – Thought the survey was a little too wide open. That there should be some choices, not having to fill in words. Brian – It's an unaided survey style, where the survey creator does not provide a lot of input because they want it to be open ended. Audrea – With this survey & another survey keep in mind that these surveys can be emotionally triggering.

Access Work Session

Access Committee,

Paul – When is the launch date for Dessau? Chad – It is June 15th. Chris – When will the other Pickup Zones start? Chad – One more in July & one more in August. James – One will be at Slaughter in the Manchaca area and the other at the Y in Oak Hill. Paul – Are we getting some new Metro Access vehicles? Chad – Yes we are getting some larger vehicles.

Approval of May 2021 Minutes

Access Committee

Minutes approved with corrections to Chris calling the meeting to order

August Meeting Topics

September in person meeting possibility.

Eligibility opening back up

Meeting adjourned at 7:13

Capital Metropolitan Transportation Authority MEETING DATE: 06/28/2021

Board of Directors

(ID # 4895)

**Customer Service Advisory Committee
(CSAC)**

TITLE: Customer Service Advisory Committee (CSAC)

Customer Satisfaction Advisory Committee
Wednesday, June 9th, 2021
Virtual Meeting
6:00 p.m. – 7:30 p.m.

Call to Order:

Chairman Taylor called the meeting to order at 6:12 p.m.

Introductions:

Committee members present were: Ephraim Taylor, David Foster, BJ Taylor

Capital Metro staff present were: Yannis Banks, Gloria Barnes, Tangee Mobley, Kevin Conlan, Jo Anne Ortiz, Brian Carter

General Public: Ruven Brooks

Community Communications

BJ Taylor – Received a call from Jean Crawford of a person in a wheelchair falling. Tangee will look into it and see what she can find out.

Project Connect Update/Pickup Update

Yannis Banks, Community Engagement

Yannis – Working groups are still happening. Please sign up for the working group and encourage others to sign up for the working groups.

Branding Update

Brian Carter, EVP Chief Engagement and Experience Officer

He is informing the committee about the brand refresh. We will look at the words & elements that we use to define our mission statements. What it is not is an effort to do a rebranding. We feel like it's a good time to rebrand. The last time we did anything of this nature was in the mid-90s. We will also take into consideration about the changing organization we have become over the past few years. We will be doing a lot of procurement, we want to make sure we are doing it so the assets will have a long shelf life. We are doing a procurement of uniform pieces at the end of the year.

Fiscal Year 2022 Budget Development Update

Kevin Conlan, Deputy CFO

The budget kicked off meetings started on February 4th. August 24th is when the proposed budget document will be online. Pending covid restrictions we will do public outreach at our transit centers or online. We are up half a percentage point compared to March 2020. We will not have a fare increase for fiscal year 2022. Freight rail is on track for what was budgeted.

Operating service will go back to pre 2019. Route 1,7,10, 20, 300 will have additional frequency. There will also be additional frequency on MetroRapid between 8 pm and 10 pm.

Update on Electric Buses

Andrew Murphy, Director Vehicle Maintenance

We currently have 12 electric buses in our fleet. We've logged 175,000 miles with the fleet without any serious incident. We are gradually ramping up to full service. We are learning about the differences between electric and diesel buses. We have trained 10 mechanics and over 200 operators how to drive the buses. We have met with Austin First Responders, so they are familiar with the buses as well if needed. The buses come with real time monitoring so we can see how the buses are performing. Currently we are figuring out how to put the buses out on the weekend since they tend to stay out longer. We have had some challenges, but we have been able to charge different buses on different chargers. We were one of the first companies in the country to do this. We have had 1 out of 50 battery packs fail. We have a 12-year warranty on the batteries so they were replaced with no problem. We have been exceeding our expected 150 miles range with the buses. We are looking into the network & studies due to the power outage from a few months ago. We are looking to use overhead chargers when it comes to the newer buses we are ordering. It will allow us to do on route charging at the end of line, which will help with keeping them running. The next delivery of electric buses will be at the end of 2022.

David F – What kind of storage are you looking at since you mentioned the winter storm.

Andrew – We are looking at working with Austin Energy to be considered an essential service so that we could be treated the same as communication network, hospitals, etc. We are looking for our charging to have dual feeds. We are also looking at storage, like battery pack storage but they can't store as much power that we will consume. David F – Are you crunching numbers to show the savings/difference in electric and diesel. Andrew – Yes. Ruven – What's customer reaction has been to the electric buses? Andrew – I have heard only good things. In our current RFP we are asking for a noise maker to be included to help with those who are visually impaired. We are asking the bus manufacturers to see what their solutions are to help find the balance of noticeable & not disruptive.

Approval of April minutes

July Meeting

- **Ridership update**
- **Conclusions of Ziccla project**
- **Leander Update – Level of service, politics**
-

Meeting Adjourned 7:27

***Capital Metropolitan Transportation Authority
Board of Directors***

***MEETING DATE: 06/28/2021
(ID # 4888)***

Approval of May 2021 Board Minutes

Approval of minutes from the April 26, 2021 board meeting and May 12, 2021 public hearing.

**CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS MEETING
2910 East Fifth Street Austin, TX 78702**

~ Minutes ~

**Monday, April 26, 2021
12:00 PM**

**12:06 PM Meeting Called To Order
3:18 PM Meeting Adjourned**

I. Public Comment:

Brent Payne, President of the local chapter of the Amalgamated Transit Union 1091, spoke in support of the proposed Capital Metro dedicated transit police force.

Executive Vice President and Chief Safety Officer Gardner Tabon read a statement on behalf of Huston Tillotson President Colette Pierce Burnette, who is also in support of the proposed plans for Capital Metro's policing.

Austin NAACP President Nelson Linder also spoke in support of the proposal, and offered his help in the process in order to secure the best outcome for everyone.

Reverend Dr. Daryl Horton from Mt. Zion Baptist Church spoke to say that he is excited about the information he has received to date on the public safety proposal, and also looks forward to helping in any way he can with implementation.

II. Advisory Committee Updates:

1. Customer Service Advisory Committee (CSAC)

Community Engagement Coordinator Yannis Banks gave the monthly report.

At this month's meeting CSAC heard an update on Project Connect, decided who would serve on the Austin Transit Partnership Community Advisory Committee, and heard presentations on the proposed June service changes, upcoming improvements at the North Lamar Transit Center, and the Capital Metro app and new "tap" fare payment cards.

2. Access Advisory Committee

Community Engagement Coordinator Yannis Banks gave the monthly report.

At this month's meeting the Access Committee heard updates from staff on Project Connect, the proposed June service changes, the upcoming improvements at the North Lamar Transit Center, and an update on the Capital Metro app and fare payment cards from the IT department.

III. Board Committee Updates:

1. Operations, Planning and Safety Committee

Chair Kitchen provided the report.

This month the Operations, Planning and Safety Committee met on April 14, and recommended the contract for the North Lamar Transit Center improvements for today's Consent Agenda. They also heard presentations on the Pickup Service Guidelines as well as an Operations performance overview. There was also a discussion around a future briefing on contracting and what the federal guidelines and parameters are around things like SBE/DBE and worker benefits for subcontractors.

Attachment: 210426 Board Meeting Minutes (4888 : Approval of May 2021 Board Minutes)

2. Finance, Audit and Administration Committee

The committee did not meet this month, so no report was given.

3. CAMPO update

CAMPO did not meet this month, so no report was given.

4. Austin Transit Partnership update

Board Member Stratton provided the report, and summarized the actions that the Austin Transit Partnership board has taken to date since its first meeting in January. He also highlighted upcoming public engagement opportunities for both the Blue and Orange lines. The new ATP Citizen Advisory Committee has been selected, and is scheduled to hold its first meeting this evening, and applications for the ATP technical advisory committees are currently being accepted. Board Member Stratton also highlighted recent meetings and discussions with the City of Austin and Federal Transit Administration.

Board Member Pool commented that she's asked City of Austin staff to provide the City Council with an update on requirements and parameters for transit-oriented development, and thought that a similar briefing would be useful for this board.

President Clarke responded that staff will be bringing both a federal regulatory update and a transit-oriented development update to the board at upcoming meetings.

IV. Presentation:

1. APTA Peer Review on Public Safety

Executive Vice President and Chief Safety Officer Gardner Tabon gave a brief overview of the current status and future plans for Capital Metro's Safety and Security Department, which include hiring public safety ambassadors and on-staff social workers to help prevent and resolve incidents. The plans also include standing up the agency's own police department operations in FY2023.

Gardner then introduced Polly Hanson from the American Public Transportation Association (APTA), Vera Bumpers from Houston Metro and Paul MacMillan from the Massachusetts Bay Transportation Authority, who were all part of the team that conducted the recent APTA peer review of proposed Capital Metro's Public Safety program.

The team then presented the names of the panel members, scope, methodology and recommendations from the review, which was conducted in January and February, 2021.

Discussion following the presentation included approaches to the hiring process, having officers who understand and have training that is transit-specific, and the importance of the non-sworn public safety staff who support sworn officers.

V. Consent Items

RESULT:	ADOPTED [UNANIMOUS]
MOVER:	Jeffrey Travillion, Board Member
SECONDER:	Ann Kitchen, Board Member
AYES:	Mitchell, Cooper, Kitchen, Renteria, Travillion, Stratton, Pool
ABSENT:	Hill

1. Approval of minutes from the March 17, 2021 board meeting.

2. Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a Construction Services Contract with Majestic Services, Inc for improvements to the North Lamar Transit Center for a total not to exceed amount of \$258,971.

VI. Action Items:

1. Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract for Wellness Program Services with EXOS Works, Inc., in an amount not to exceed \$1,166,967.

Executive Vice President of Administration Donna Simmons brought this item forward.

The vendor chosen for this award is the current vendor for these services. Donna gave a brief presentation that included the scope of this contract, which includes the Capital Metro fitness centers, nutrition counseling, personal training, tobacco cessation programs, and a bike loan program.

RESULT:	ADOPTED [UNANIMOUS]
MOVER:	Eric Stratton, Board Secretary
SECONDER:	Leslie Pool, Board Member
AYES:	Mitchell, Cooper, Kitchen, Renteria, Travillion, Stratton, Pool
ABSENT:	Hill

2. Approval of the Capital Metro Pickup Service Guidelines.

Executive Vice President of Planning and Development Sharmila Mukherjee and Vice President of Demand Response Chad Ballentine brought this item forward.

These guidelines have been under development for approximately four months, and Sharmila thanked the board for their comments and participation in the process.

Chad then reviewed upcoming Pickup milestones and let the board know that the evaluation framework presented here would not be put into use until plans were being developed for the FY 2023 budget. He then gave an overview of the current Pickup service and zones and development of the guidelines. Sharmila followed with slides that included policy goals and purposes for the service, and the approaches to planning and evaluating it. She also put forward and discussed the proposed "scoring matrix" to be used for evaluation. Chad then closed the presentation with a few slides summarizing the implementation and monitoring of the service under the proposed guidelines and a timeline for the launch of several new zones.

Board Member Travillion commented that this service is likely to be important in areas that have been traditionally underserved by transit. He hopes that the agency can look at expanding the service to cover workers who don't work the traditional 9 to 5 day, by running Pickup later than 7 p.m. and on weekends. It will be important to listen to stakeholder feedback and be responsive to it.

Board Member Stratton asked for clarification on several of the criteria on the matrix, including connections to fixed-route services and how many trips on MetroAccess might be replaced by Pickup.

Board Member Kitchen thanked Sharmila and Chad for going back and looking at access to Pickup for people with disabilities, which she had raised at a previous meeting.

After the vote on this item President Clarke spoke to thank Chad and Sharmila, and to pass along his appreciation to the board for their input and willingness to work with staff on this item.

RESULT:	ADOPTED [UNANIMOUS]
MOVER:	Ann Kitchen, Board Member
SECONDER:	Jeffrey Travillion, Board Member
AYES:	Mitchell, Cooper, Kitchen, Renteria, Travillion, Stratton, Pool
ABSENT:	Hill

VII. Presentation

1. Project Connect Program Update and Review of the Integrated Financial Model

CFO Reinet Marneweck and Executive Vice President of Planning and Development Sharmila Mukherjee presented this item.

Sharmila began the presentation by reviewing the Project Connect projects that are currently underway and managed by Capital Metro, including new rail stations at Broadmoor and McKalla Place and improvements along the Red Line. She also provided an update on the planning process underway under the grant received from the Federal Transit Administration for Transit Oriented Development, and on the milestones that are part of the launch of two new MetroRapid lines.

Reinet then reviewed the Project Connect integrated financial model. She started with a summary of the adopted Sequencing Plan and conceptual program capital costs, totaling \$7.1 billion. She reviewed the funding sequence for implementation of the entire plan and noted that we are about two years away from updating the model when 30% engineering costs are known for the Blue Line, Orange Line, and tunnel. She discussed recent updates to the timing of the funding approved as part of anti-displacement strategy, and highlighted a graph showing program expenditures, revenues, and debt between now and 2035. She then outline the strategy for servicing the debt over time.

Board Member Kitchen asked for further details on the Oak Hill/Menchaca MetroRapid line planning process and TOD planning along the southern portion of the Orange Line.

Board Member Pool asked for further details on the type of debt that is expected and overall timeframe for it, which kicked off a board discussion about local, state and federal funding for transit funding.

Board Member Kitchen commented on the timing of the anti-displacement funding and the need for Austin City Council, Cap Metro and the Austin Transit Partnership to get ahead of the curve in order to avoid or mitigate displacement.

Board Member Stratton and Chair Cooper recognized and thanked Reinet on the occasion of her last presentation to the full board before she retires.

VIII. Reports:

1. President's Report

President Clarke gave his monthly report. This month's topics included a staff and community vaccination update, recent engagements with Capital Metro's federal government partners, and a recent ceremony to recognize 11 employees who provided exemplary services to the community following the February winter storm.

IX. Items for Future Discussion:

X. Adjournment

ADA Compliance

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CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY PUBLIC HEARING

2910 East Fifth Street Austin, TX 78702

~ Minutes ~

Wednesday, May 12, 2021
12:00 PM

12:05 PM Hearing Called To Order
12:45 PM Adjourned

I. Presentations:

1. Title VI Policy Update Presentation

Executive Vice President for Planning and Development Sharmila Mukherjee was joined by Capital Metro Senior Planner Rose Lisska for the presentation.

Sharmila kicked off the presentation by reviewing the language from the Civil Rights Act of 1964 that pertains to Title VI as context for the current updates. As a recipient of federal funds Capital Metro is required to adopt certain thresholds when adjustments to service are made. Rose and Sharmila then reviewed the overall Capital Metro service change process, Title VI program update schedule, and the approach that Capital Metro has taken to the Title VI policy update.

Rose and Sharmila then reviewed the Capital Metro Major Service Change Policy, the Disproportionate Burden Policy, and the Disparate Impact Policy, and the proposed threshold changes, including comparisons with peer transit agencies. Sharmila reviewed the objectives that are being looked at as changes to the thresholds are considered, and summarized the specific recommendations to policy language. Under the proposal the thresholds for the Disproportionate Burden and Disparate Impact policies would rise from 2% to 10%.

II. Public Comment:

Zenobia Joseph, citizen, spoke in opposition to the proposed changes to the thresholds. She has asked repeatedly for Route 392 to be restored to the Arboretum, and the Route 240 Rutland was eliminated entirely. Her understanding is that the City of Austin will be relocating homeless people to 1934 Rutland. Samsung will be rebating about \$200 million over 17 years, and there is a rebate from Apple, but there is no transportation along the corridor. She would ask that Capital Metro make the service more equitable for people in the northeast Austin, and not just serve the White and Hispanic people in the southwest and central parts of our city.

Charlene Harris, citizen, spoke and agreed with Ms. Joseph that certain areas of the city are not well represented or served. She is having to walk further to access transit -- particularly in the area around Manor and Rogge -- which is difficult in the rain and heat. Capital Metro needs to do a better job serving low income and homeless residents. Many stops lack benches and shelters. She feels that many voices are not being heard.

Attachment: 210512 Public Hearing Minutes (4888 : Approval of May 2021 Board Minutes)

III. Items for Future Discussion:

IV. Adjournment

ADA Compliance

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**Capital Metropolitan Transportation Authority
Board of Directors**

**MEETING DATE: 06/28/2021
(ID # 4878)**

Contract for 139J Support Services

Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract with Kimley-Horn and Associates, Inc for environmental review services pursuant to Section 139(j) of title 23, U.S. Code in an amount not to exceed \$1,226,502.

**Capital Metropolitan Transportation Authority
Board of Directors**

**MEETING DATE: 6/28/2021
(ID # AI-2021-1482)
139J Award**

SUBJECT:

Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract with Kimley-Horn and Associates, Inc for environmental review services pursuant to Section 139(j) of title 23, U.S. Code in an amount not to exceed \$1,226,502.

FISCAL IMPACT:

Funding for this action is available in the FY2021 Capital Budget.

STRATEGIC PLAN:

Strategic Goal Alignment: Project Connect

Strategic Objectives: Project Connect.

EXPLANATION OF STRATEGIC ALIGNMENT: The 139J Consultant will be performing environmental review for the Orange and Blue Line light rail lines as part of Project Connect pursuant to 23 U.S.C. § 139(j) which is to set forth the necessary framework to permit FTA to receive contractor support to expedite environmental review, compliance, and documentation activities for public transportation projects sponsored by Capital Metro.

BUSINESS CASE:

Project Connect is a multigenerational plan to improve transit throughout the region and allows Capital Metro to position the agency accordingly to handle future growth in the region. The 139J consultant team provides additional resources and expertise to FTA in order to efficiently review the environmental materials developed through the Project Connect program.

COMMITTEE RECOMMENDATION: This item will be presented to the full board on June 28, 2021.

EXECUTIVE SUMMARY:

Capital Metro has embarked on an update to the long-term vision for the agency through Project Connect since 2016. Over the past four years, corridors have been identified to create a high-capacity transit system and numerous projects have been identified to help improve existing services and create new services. The Project Connect System Plan was adopted by the Capital Metro Board on June 10, 2020. To continue to advance projects within the Project Connect System Plan through Engineering/NEPA, Capital Metro will be utilizing Section 139(j) of title 23, U.S. Code to



provide support to FTA in the environmental review process for the program. Section 139(j) of title 23, U.S. Code authorizes States to provide funds to Federal agencies, State agencies, and/or federally recognized Indian tribes that are participating in the FHWA/FTA environmental review process for one or more transportation projects in the State. Such funds may be provided only to support activities that directly and meaningfully contribute to expediting and improving transportation project planning and delivery for projects in that State.

FTA is responsible for ensuring that environmental analysis for a transportation project is prepared and completed in accordance with 23 U.S.C. § 139, 23 CFR part 771, and other applicable Federal laws and regulations. This environmental review process takes into account other applicable Federal laws under the purview of other agencies (e.g., the Endangered Species Act, the Clean Water Act, the National Historic Preservation Act), and the completion of any environmental permit, approval, review, or study required under those other Federal laws.

DBE/SBE PARTICIPATION: Due to the nature of the solicitation a DBE goal was not established on this project.

PROCUREMENT:

This resolution requests approval to execute a contract with Kimley-Horn and Associates, Inc. in an amount not to exceed \$1,226,502 for the work to be done on Project Connect FTA NEPA Support Services 139J.

On May 21, 2021, a Request for Proposals was issued and formally advertised. By the closing date of June 8, 2021, one proposal was received. The evaluation team used the following factors in the evaluation of proposals:

- (1) The Offeror's experience advising FTA on NEPA related documents in a similar capacity as described in Section 139J [23 U.S.C. § 139(j)].
- (2) The Offeror's experience leading a NEPA Transit Planning project with FTA as the lead federal agency.
- (3) The Offeror's demonstrated FTA NEPA experience for projects in FTA's Capital Investment Grant (CIG) pipeline.
- (4) The Offeror's experience with NEPA Transit Planning.

The proposal from Kimley Horn and Associates, Inc. was determined to be the best value to the Authority, price and other factors considered. The contract is a fixed-rate, labor hour contract. The term of the Contract shall be two (2) years from the contract notice to proceed for a total amount not-to-exceed amount of \$1,226,502 as follows:



Base Period 1 (Year 1)	\$ 601,223.00
Base Period 2 (Year 2)	\$ 625,279.00
GRAND TOTAL	\$1,226,502.00

RESPONSIBLE DEPARTMENT:
Project Connect



**RESOLUTION
OF THE
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS**

STATE OF TEXAS

COUNTY OF TRAVIS

RESOLUTION (ID # AI-2021-1482)

139J Award

WHEREAS, the Project Connect program is seeking environmental clearance under the National Environmental Protection Act (NEPA) for multiple projects within the program; and

WHEREAS, Section 139(j) of title 23, U.S. Code authorizes States to provide funds to Federal agencies, State agencies, and/or federally recognized Indian tribes that are participating in the FHWA/FTA environmental review process for one or more transportation projects in the State.

WHEREAS, FTA is the Federal Lead Agency for Capital Metro and responsible for environmental review of projects pursuing Federal funding.

NOW, THEREFORE, BE IT RESOLVED by the Capital Metropolitan Transportation Authority Board of Directors that the President & CEO, or his designee, is authorized to execute a contract with Kimley-Horn in the amount of \$1,226,502 for environmental review services pursuant to Section 139(j) of title 23, U.S. Code needed to complete the environmental review of projects within the Project Connect program in accordance with the NEPA process and FTA requirements.

Date: _____

**Secretary of the Board
Eric Stratton**

Attachment: Resolution-AI-2021-1482 (4878 : Contract for 139J Support Services)



Date: 6/16/21

To: Randy Clarke, President/CEO
Dottie Watkins, COO/CCO, Capital Metro
Catherine Walker, CFO, Capital Metro

cc: Kirk Perry, Contracts Administrator III

From: Dave Couch, Chief Program Officer, ATP

Subject: Contract Approval, Kimley-Horn & Associates, Inc. Contract for 139J Environmental Review

Executive Summary

The Project Connect program encompasses multiple projects that are pursuing Federal funding. Environmental clearance through the National Environmental Protection Act (NEPA) is required for projects to obtain Federal funding. Capital Metro is clearing multiple projects through the NEPA process concurrently with the Federal Transit Administration (FTA), as the NEPA lead agency.

The consultant team will work with FTA exclusively and perform environmental review of documentation related to the environmental clearance of materials for the ongoing Project Connect efforts. These materials could include components of Environmental Impact Statements (EIS), Environmental Assessments (EA), or Categorical Exclusions (CE) but the exact determination of materials will be decided by FTA.

Kimley-Horn is uniquely capable of conducting this environmental review based on their previous work on NEPA and understanding of FTA policies and procedures. 139J staff will be embedded with FTA and under FTA's management.

Beth Bartz is a senior project manager in Kimley-Horn's environmental and transportation practice as well as public engagement and communications practices. Throughout her three-decade career, she has led environmental documentation efforts and helped public sector clients achieve broad community and agency agreements on challenging transportation and land use planning projects. She has worked on many significant transit, highway, and river crossing projects, facilitating development of project alternatives within the context of NEPA, state environmental regulations, and community goals. Beth has worked on significant transit projects leading Pre-project Development, NEPA, Concept Design, Community Engagement, and Station Area Planning.

Jeanne Witzig has devoted her 34 years of experience managing and successfully advancing transit projects through the environmental review process at the federal and state levels. Both locally and nationally, Jeanne has earned the reputation of being a problem solver, always committed to working toward both a process and solution that adds value to a project. She approaches the environmental process as an opportunity to build understanding and support around a project, while developing, evaluating, and eventually advancing the best project definition.

Budget Information

The project has a duration of 24 months focused on environmental review of Project Connect environmental efforts. Funding for this effort will be from Project Connect Orange and Blue Line budget allocation. If travel expenses are required for this effort they will be a pass through item and incurred on an as needed basis.

Contract Amount requested	\$1,226,502
Operating or Capital Budget	Capital funds
Responsibility Center Line Item	600-5100310-920-177-998-PLN2002 600-5100310-920-177-998-PLN2003

In order to complete the 24 month effort within the timeframe requested, Kimley-Horn agreed to assign the equivalent of 1 full-time and up to 4 support staff assigned for a total cost of \$1,226,502. The effect hourly rate based on these assignments is approximately \$315 per hour per FTE.

APPROVALS:

Dave Couch, ATP Chief Program Officer

Signature

Date

Catherine Walker, CFO
(\$500,000 and above)

Signature

Date

Dottie Watkins, CCO/COO
(\$700,000 and above)

Signature

Date

Randy Clarke, President/CEO
(\$1,000,000 and above)

Signature

Date

Capital Metropolitan Transportation Authority
Board of Directors

MEETING DATE: 06/28/2021
(ID # 4879)

Contract for Network Infrastructure Replacement

Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract with Sirius Computer Solutions, Inc. to replace network infrastructure technology in an amount not to exceed \$234,059.

**Capital Metropolitan Transportation Authority
Board of Directors**

**MEETING DATE: 6/28/2021
(ID # AI-2020-1330)
Network Infrastructure Replacement**

SUBJECT:

Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract with Sirius Computer Solutions, Inc. to replace network infrastructure technology in an amount not to exceed \$234,059.

FISCAL IMPACT:

Funding for this action is available in the FY2021 Capital Budget.

STRATEGIC PLAN:

Strategic Goal Alignment:
3. Sustainability

Strategic Objectives:

3.6 Adherence to State of Good Repair Program

EXPLANATION OF STRATEGIC ALIGNMENT:

Maintaining and replacing network infrastructure technology such as routers, firewalls, and switches in a state of good repair ensures stable and reliable systems available to both internal and external customers.

BUSINESS CASE:

This is a state of good repair initiative to replace network security, network switch equipment, and wireless access point equipment that are types of network infrastructure technologies and have exceeded their useful life. The lifecycle of the typical network infrastructure technology is four to seven years. Each year out of life cycle network infrastructure technology is replaced to maintain a state of good repair. Failure to act will result in issues with network performance and reliability as well as increasing the risk of outages. Annually, the overall design, security, and roadmap is reviewed for implementation of a long term secure and robust solution that supports business continuity.

COMMITTEE RECOMMENDATION:

This agenda item will be presented to the full board on June 28, 2021.

EXECUTIVE SUMMARY:

This contract will provide for the annual replacement of network infrastructure technology that is past its useful life to ensure stable and reliable systems available to both internal and external customers.

SBE PARTICIPATION:



The SBE goal is 8%. The prime contractor will be utilizing the following SBE subcontractor:

Subcontractor	Race/Gender	Services/Products	SBE Responsive
Mobilematics	Asian/Pacific Islander /Female	Supply with IT hardware and software	8.35%
			8.35%

PROCUREMENT:

The Authority will utilize the Department of Information Resources (DIR) contract #DIR-TSO-4167, held by Cisco System, to contract with Sirius Computer Solutions, Inc., who is authorized to resell Cisco Branded Products and Services under Cisco's DIR contract.

DIR awarded contracts are made available for use by Capital Metro via Title 7, Intergovernmental Relations Chapter 791, Interlocal Cooperation Contracts and The Texas Interlocal Cooperation Act.

Purchases made using DIR contracts satisfy otherwise applicable competitive bidding requirements. Pricing for the Cisco Network Infrastructure Replacement was determined to be fair & reasonable by DIR's organization during its solicitation and award process. Additionally, On January 29, 2021, a Request for Proposals was issued to eight (8) DIR vendors who are authorized to resell Cisco products and services under Cisco's DIR contract. By the closing date of March 10, 2021, three (3) proposals were received. The evaluation team used the following factors in the evaluation of proposals:

- (1) Methodology and quality of the work plan proposed to meet project objectives.
- (2) The offeror's demonstrated technical background, past performance, and experience on projects of a similar size, scope, complexity and nature.
- (3) Capabilities and experience of the firm and staff.

The proposal from Sirius Computer Solutions, Inc. was determined to be the best value to the Authority, price and other factors considered. The contract is a fixed price contract. The base term for the infrastructure replacement is one-hundred and eighty (180) calendar days from notice to proceed with one (1) base year for maintenance and support. The Lump Sum pricing offered is detailed below.

Description	Lump Sum
Cisco Network Infrastructure Replacement	\$215,512.52
Base Year for Maintenance and Support	\$18,546.44
Grand Total Award:	\$234,058.96



**RESOLUTION
OF THE
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS**

STATE OF TEXAS

COUNTY OF TRAVIS

**RESOLUTION (ID # AI-2020-1330)
Network Infrastructure Replacement**

WHEREAS, the Capital Metropolitan Transportation Authority Board of Directors and Capital Metro management endeavor to provide adequate state of good repair to the network infrastructure technology.

NOW, THEREFORE, BE IT RESOLVED by the Capital Metropolitan Transportation Authority Board of Directors that the President & CEO, or his designee, is authorized to finalize and execute a contract with Sirius Computer Solutions, Inc. to replace network infrastructure technology in an amount not to exceed \$234,059.

**Secretary of the Board
Eric Stratton**

Date: _____

Attachment: Resolution-AI-2020-1330 (4879 : Contract for Network Infrastructure Replacement)

***Capital Metropolitan Transportation Authority
Board of Directors***

***MEETING DATE: 06/28/2021
(ID # 4889)***

Approval of Title VI Policy Revisions

Approval of a resolution adopting the Revised Title VI Policies and approving the Title VI Service Monitoring Results, and approval of submission of the Triennial Title VI Program Update to the Federal Transit Administration..

**Title VI Policy Revision, Title VI Service Monitoring Results, and
2021 Title VI Program Update**

SUBJECT:

Approval of a resolution adopting the Revised Title VI Policies and approving the Title VI Service Monitoring Results, and approval of submission of the Triennial Title VI Program Update to the Federal Transit Administration.

FISCAL IMPACT:

This action has no fiscal impact.

STRATEGIC PLAN: Strategic Goal Alignment:
High Quality Customer Experience.

Strategic Objectives:
Continuous improvement

EXPLANATION OF STRATEGIC ALIGNMENT:

A Title VI program that complies with federal regulations is required for receiving federal funds. In general, Title VI policies and procedures are in place to monitor and ensure equitable Capital Metro transit services. The proposed policy changes are consistent with peer benchmarking and state of practice. The service monitoring is conducted based on the guidance provided in FTA Circular 4702.1B to identify if there are any disproportionate impacts on services to minority routes. The policy and other updates are designed to meet Capital Metro's Strategic Plan goals.

BUSINESS CASE:

Federal regulations require Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population to review and approve a Title VI Program every three years, including monitoring services, Language Assistance planning, and any changes to the Title VI policies.

COMMITTEE RECOMMENDATION:

This item will be presented to the full Board on June 28, 2021.

EXECUTIVE SUMMARY:

Title VI prohibits recipients of Federal financial assistance, such as Capital Metro, from discriminating on the basis of race, color, or national origin in their programs or activities, and it obligates Federal funding agencies to enforce compliance. FTA regulations establish a program and process to ensure and measure compliance with Title VI of the law.



2021 Title VI Program Update

The FTA requires that all direct and primary recipients document their compliance with the Department of Transportation's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. The FTA Circular 4702.1B, as implemented on October 1, 2012, also requires that the Title VI Program be approved by the recipient's board of directors or appropriate governing entity or officials responsible for policy decisions prior to submission to FTA.

Title VI Policy Revision

The Circular requires that the Title VI policy update be approved by the board and done only during the triennial Title VI Program submission. Staff developed and presented proposed changes to these policies to the board at a May 12, 2021 Public Hearing and at several community meetings. Based on analysis and feedback from the public input process, staff recommends the following changes to Title VI Policies:

- 1) One consolidated policy, instead of three separate policies.
- 2) Proposed changes to the Major Service Change Policy include:
 - Removing specific references to modes to make the policy universal.
 - Clarifying that a Major Service Change is defined as a change of 25% or greater in the number of annual revenue hours/miles provided. The policy previously defined a Major Service Change as "more than 25% of its route miles" and "25% or greater change in the number of daily service hours".
 - Added exceptions such as temporary promotions and circumstances beyond the control of Capital Metro such as construction.
 - Added language that all fare changes will result in an equity analysis.

Title VI Service Monitoring Report

To ensure equity in fixed route services, FTA requires recipients that meet the above mentioned thresholds to monitor the performance of fixed route services related to their system-wide service standards and policies at least once every three years. This monitoring compares performance of minority routes to non-minority routes for service standards and policies. These are: Vehicle Load, Vehicle Frequency, On-Time Performance (OTP), Service Availability, Transit Amenities, Vehicle Assignments.

Except OTP, all other areas met the service standards and policies for both minority and non-minority routes. OTP has failed to meet the standards for both minority and non-minority routes. Staff recommends conducting service monitoring again when ridership is at 80% of pre-COVID levels. However, no results show any disparate impact on minorities.



The Circular requires documentation of the Board's "consideration, awareness and approval of the monitoring results".

Language Assistance Plan Update

Capital Metro updated its Language Assistance Plan (LAP) for persons with Limited English Proficiency (LEP) in accordance with the requirements. It has conducted a four-factor analysis using the census data and various surveys as required by the Circular to provide meaningful access to LEP persons for Capital Metro services. The LAP identifies the languages that meet the threshold for translation, identifies the vital documents that need to be translated and provides the recommendations for short-term and long-term implementation.

Currently, Capital Metro translates documents to Spanish, with nine additional language translations available upon request (Vietnamese, Chinese (Mandarin), Korean, Arabic, Telugu, Punjabi, Burmese, French, and Pashto). The latter five languages are newly added as a result of this LAP update.

Several early action items have been identified as improvements to our LAP, such as making translation availability more prominent and clearer on websites, digital materials, and printed materials, and translating critical Title VI complaint forms into other languages.

Various long-term action items have also been identified, such as updating the Capital Metro apps to include more languages, updating at-stop and on-board hardware to include Spanish and pictographs where necessary, and translation of audible announcements into more languages.

The Title VI Program is required to be submitted to FTA by August 1, 2021 when the existing Title VI approval for Capital Metro will expire.

DBE/SBE PARTICIPATION: Does not apply.

PROCUREMENT: Does not apply.

RESPONSIBLE DEPARTMENT: Diversity and Compliance.



**RESOLUTION
OF THE
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS**

STATE OF TEXAS

COUNTY OF TRAVIS

RESOLUTION (ID # AI-2021-1471)

**Title VI Policy Revision, Title VI Service Monitoring Results, and
2021 Title VI Program Update**

WHEREAS, Capital Metropolitan Transportation Authority (Capital Metro) is the recipient of Federal transit funds; and

WHEREAS, 49 CFR Section 21.9(b) requires Capital Metro to have a Title VI Program; and

WHEREAS, the Capital Metro board of directors is required to have board adopted Major Service Change, Disparate Impact and Disproportionate Burden policies under Federal Transit Administration (FTA) Circular 4702.1B; and

WHEREAS, these policies establish thresholds for when to conduct an analysis for service and fares to determine their impacts on minority and low-income populations; and

WHEREAS, the policies must be updated to reflect the demographic changes in Capital Metro's service area; and

WHEREAS, the FTA requires that recipients of FTA funding that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population to monitor its fixed-route services comparing minority and non-minority routes; and

WHEREAS, the FTA requires that recipients of FTA funding prepare and submit a Title VI Program Update every three years.

NOW, THEREFORE, BE IT RESOLVED by the Capital Metropolitan Transportation Authority Board of Directors that the revised Title VI Policy, Title VI Service Monitoring

Attachment: Resolution-AI-2021-1471 (4889 : Approval of Title VI Policy Revisions)



Results, and the 2021 Title VI Program update in the attached documents are hereby approved for submittal to the Federal Transit Administration.

Secretary of the Board
Eric Stratton

Date: _____

Capital Metro
Title VI Program

2021



 METRO

Capital Metro Title VI Program Update 2021

1



METRO

Title VI of the Civil Rights Act of 1964

“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.”

- Title VI applies to Capital Metro because Capital Metro receives Federal funding.
- If an agency is found in violation of Title VI, that agency may lose its Federal funding unless the violation is resolved.
- An agency must submit an updated Title VI Program every three years.
- Capital Metro’s Title VI Program is due August 1, 2021.

Title VI Program

- Ø Title VI Notice to the Public
- Ø Title VI Complaint Procedures
- Ø Title VI Investigations, Lawsuits, and Complaints
- Ø Inclusive Public Participation Plan
- Ø Demographics of Board-appointed Committees
- Ø Language Assistance Plan **(Briefing Only)**
- Ø Subrecipient Monitoring Procedures
- Ø Determination of Site/Location of Facilities
- Ø System-wide Service Standards and Policies
- Ø Demographic Data, Maps, Charts, and Ridership Analysis
- Ø Revised Title VI Policies and Summary of Equity Analyses **(Board Approval Required)**
- Ø Service Monitoring Results **(Board Approval Required)**

Triennial Title VI Program Update **(Board Approval Required)**

Language Assistance Plan (LAP) Update



Language Assistance Plan (LAP)

- The FTA requires a LAP to guide how Capital Metro reaches out to Limited English Proficiency (LEP) communities
- Limited English Proficiency (LEP)
 - LEP Individuals are those that respond with 'less than very well' on US census language fluency questions.
 - Safe Harbor Provision states: If any language group constitutes 5% or 1,000 persons (which ever is less) then translation of vital documents may be required
- LAP Update
 - It is updated on a 3-year cycle
 - The LAP update targeted outreach to non-English speaking communities



Four Factor Analysis



The **number and proportion** of LEP persons to be served or likely to encounter a program, activity or service of CMTA

FACTOR

1



The **frequency** with which LEP individuals come into contact with CMTA programs or services

FACTOR

2



The **nature and importance** of the program, activity, or service provided by CMTA to people's lives; and

FACTOR

3



The **resources available** to CMTA and costs for translation services

FACTOR

4

Required per Federal Register Volume 70, Number 239

Language Assistance Plan (LAP) Update

- We formulated the plan based on outreach, analysis of data and demographics using the Four Factor Analysis
- The Four Factor Analysis Included:
 - Surveyed Community Based Organizations (CBO), Service Providers, and Capital Metro Admin and MV Staff
 - Analysis of Capital Metro practices to address changes to population in the service area
- Translations
 - Current translations are in Spanish
 - Translations available upon request for: Vietnamese, Chinese (Mandarin), Korean, Arabic, Telugu, Punjabi, Burmese, French, and Pashto.

Early Action Items for LAP

- Add all languages to Google Translate.
- Update website to ensure access to LEP populations
- Notice to beneficiaries of Title VI protections translated into all Safe Harbor languages
- Provide notice of Free Language Assistance in all Safe Harbor languages on the mast head of the website and all digital and printed materials
- Translate Title VI complaint forms into Safe Harbor languages

Long-term Action Items for LAP

- Website and Mobile App
 - Allow for translation into all Safe Harbor Languages on CapMetro-sponsored apps
 - Translate all website content using online tools
 - Consider simultaneous translation equipment to offer greater flexibility for language translation.
- Infrastructure and Stop/Station
 - Translate TVMs, Fareboxes, Bus Stops, and Onboard Equipment into Spanish and use pictographs where possible
 - Use pictographs as much as practicable for Safety and Security Information
 - Translate audible announcements into other languages
- Community Engagement
 - Enhance relationships with CBOs to improve communication methods and engagement with customers

Service Monitoring



Service Monitoring

- Service Monitoring analyzes the performance of minority routes compared to non-minority routes against the 6 service standards:
 - Vehicle Load
 - Vehicle Frequency
 - On-Time Performance
 - Service Availability
 - Transit Amenities
 - Vehicle Assignments
- Minority Routes have at least one-third of the revenue miles located in minority Census Block Groups (threshold for Minority Block Groups is 50%)
 - 48 of Capital Metro's 70 routes are defined as minority routes

Monitoring Results Summary*

Standard	Results
Vehicle Load	Both minority and non-minority routes <u>met</u> service standards
Vehicle Frequency	Both minority and non-minority routes <u>met</u> service standards
On-Time Performance	Both minority & non-minority routes <u>failed</u> to meet the standard
Service Availability	82% of area within service area <u>met</u> the guideline
Transit Amenities	Bus stops in minority Block Groups <u>met</u> the guidelines for shelters more than stops in non-minority areas
Vehicle Assignments	Minority routes had the correct vehicle assigned <u>more often</u> than non-minority routes.

*Analysis used February 2020 Pre-COVID data



Service Monitoring Next Steps

- Operations & Planning staff meet weekly to monitor route performance
 - Focus on passenger loads and on-time performance
- Conduct service monitoring again when ridership is at 80% of pre-COVID levels.



Revised Title VI Policies



Title VI Policy Update Approach

- Compliant with FTA Guidance
- Conduct peer review
 - ü Review peer agency metrics, thresholds, & demographics for perspective
- Major Service Change considerations
 - ü More clear and consistent with how we plan our services
- DI/DB policy considerations
 - ü Do thresholds & policy work for all fare & service changes?
 - ü Is the threshold appropriate for the agency's demographics and use?
- Seek input – Conduct outreach



The best practice is to be forward-looking and 'timeless' in our policy approach

Major Service Change Policy

- Capital Metro established a threshold for when a “**major**” service change is considered.
- If a route changes by more than 25% (annual miles or hours) it triggers an analysis of minority and low-income populations.
- All fare changes require a Title VI analysis.



Disparate Impact Policy (Minority) and Disproportionate Burden Policy (Low Income)

- Capital Metro established a threshold for determining if a given service or fare change would have a fair distribution of effects on **minority/low income** populations compared to non minority/non low-income populations.
- Evaluating the **difference in the impact** to minority/low-income and non minority/non low-income.
- If the threshold is exceeded, then it triggers further analysis of the routes and Capital Metro is obligated to avoid, minimize or mitigate impacts.

Title VI Policies

1. **Consolidate** three separate policies into one policy
2. **Major Service Change Policy**
 - Remove specific references to modes to make the policy universal & evergreen
 - Add exceptions for items out of Capital Metro's control
 - State all fare changes result in an equity analysis
 - 25% of annual revenue miles / hours (current policy)
3. **Disparate Impact Policy (Minority Populations)**
 - 2% threshold (current policy)
4. **Disproportionate Burden Policy (Low-Income Populations)**
 - 2% threshold (current policy)
5. **Poverty Threshold**
 - 25% higher than the Federal Poverty level (current policy)

Policy Threshold	Current	Proposed	Final
Disparate Impact	2%	10%	2%
Disproportionate Burden	2%	10%	2%



Title VI Program

Items	Board Action
Language Assistance Plan	Update Only
Title VI Policy Updates	Board Approval
Service Monitoring Updates	Board Approval
Triennial Title VI Program Update	Board Approval



METRO

THANK YOU!

Capital Metro Title VI Program

2021



Attachment: TITLE VI COMPLIANCE REPORT Final (4889 : Approval of Title VI Policy Revisions)



METRO

TITLE VI PROGRAM COMPLIANCE REPORT

CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY

Response to the Federal Transit Administration
Circular 4702.1B Regarding
Title VI of the Civil Rights Act of 1964

June 2021

CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
2910 EAST FIFTH ST
AUSTIN, TX 78702
(512) 474-1200
WWW.CAPMETRO.ORG

Attachment: TITLE VI COMPLIANCE REPORT Final (4889 : Approval of Title VI Policy Revisions)

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I. Introduction

A. PROGRAM OVERVIEW

Capital Metropolitan Transportation Authority (“Capital Metro”) complies with Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000d, et seq (“Title VI”), which provides that:

[n]o 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.

Capital Metro’s responsibility is to guarantee that access to all transit services is equitably distributed and provided without regard to race, color, or national origin. To ensure its transit services do not have any adverse and discriminatory impacts on minority and low-income populations within the system, Capital Metro has compiled this triennial Title VI Program Compliance Report (this “Report”) as required by the Federal Transit Administration (FTA).

This Report contains information on transit services administered by the Capital Metro and its subrecipients and is intended to document compliance with Title VI of the 1964 Civil Rights Act regarding nondiscriminatory delivery of services and benefits under federally-funded programs or activities. In accordance with FTA Circular 4702.1B (the “Circular”), various data, assurance statements, maps, and transit-related information and analyses are provided.

This Report begins with a profile of Capital Metro and a description of its services. It then responds to the general requirements of the Circular. There are additional requirements for a transit provider which operates 50 or more fixed route vehicles in peak service and is located in an Urbanized Area (UZA) of 200,000 or more in population. Accordingly, this Report includes required additional program-specific reports, analyses, and policies on Capital Metro services. Appendices are provided at the end for additional information.

B. PROFILE OF CAPITAL METRO

Capital Metro was formed in 1985 in accordance with Chapter 451 of the Texas Transportation Code to provide transit services within the Austin metropolitan area. It is the major public transportation provider of this area. The transit authority serves Austin and the surrounding communities of Leander, Lago Vista, Jonestown, Manor, San Leanna, and Point Venture, as well as the unincorporated area of Travis County Precinct 2 and the Anderson Mill area of Williamson County. Capital Metro services include bus, rail, ride-share programs, special event services, and special transit services for the mobility impaired. Service area communities participate in the one percent (1%) sales tax levied to support Capital Metro service. The Capital Metro service area extends across approximately 535 square miles and includes a population of 1,163,204.

Capital Metro’s Board of Directors (the “Board”) is an 8-member body responsible for making policies about the operation, control, and management of Capital Metro. It is authorized to hire the President & CEO to operate Capital Metro effectively.

The Board consists of:

- Three members appointed by the Capital Metropolitan Planning Organization (CAMPO), including an elected official; one appointee with a business background; and one appointee with a financial background.
- One member representing the smaller cities within Capital Metro's service area.
- One member each appointed by the Travis County commissioners and Williamson County commissioners.
- Two members appointed by the Austin City Council, one of whom is an elected official.

Capital Metro operates 80 fixed routes with a requirement of 282 vehicles during peak service. The fixed-route system includes: 6 radial, 12 frequent, 6 flyer, 8 feeder, 13 crosstown, 14 special services, 12 UT Shuttles, 2 MetroRapid BRT lines, and 7 express routes. In addition to fixed-route services, Capital Metro provides complimentary paratransit service, MetroAccess, as required by the Americans with Disabilities Act (ADA). Capital Metro offers rail service using 6 trainsets Monday through Saturday between Leander and downtown Austin. Capital Metro also operates an on-demand neighborhood service, Pickup, in 7 dedicated zones.

Due to the ongoing COVID-19 pandemic, Capital Metro has suspended service on 8 special service and 3 express routes. Some flyer routes are operating reduced schedules. Rail and Pickup are operating on weekdays only. All other services are operating their normal schedules.

Capital Metro's planning activities are included in the Unified Planning Work Program (UPWP), which is adopted annually by CAMPO which serves the Austin metropolitan area. Capital, operating, and planning activities of Capital Metro are also reflected in various Capital Metro plans on the capmetro.org website and in the short-range Transportation Improvement Program (TIP) as well as in the region's long-range transportation plan (LRTP).

II. General Reporting Requirements



A. TITLE VI NOTICE TO THE PUBLIC

Capital Metro is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. In accordance with Title 49 CFR Section 21.9(d) and guidance provided in FTA Circular 4702.1B, Capital Metro's Title VI Notice to the Public (the "Notice") includes:

1. A statement that Capital Metro operates programs without regard to race, color, or national origin;
2. A description of the procedures that the public should follow in order to request additional information regarding Capital Metro's Title VI obligations; and
3. A description of the procedures that the public needs to follow in order to file a Title VI discrimination complaint.

Capital Metro's Title VI Program information can be found on the website at: <https://capmetro.org/titlevicompliance>. The Notice is posted on all Capital Metro buses used for fixed-route services. In addition, Capital Metro has posted the Notice at its rail stations, notice boards of various administrative buildings, park & ride locations, transit centers, and transit store (See Table 1). The Notice contains a phone number as well as e-mail and surface mailing address for customers to file a Title VI discrimination complaint.

Table 1. Facilities where Title VI notice is posted.

Facility	Address	City	State	Zip
Transit Store	209 W. 9 th St.	Austin	TX	78701
Capital Metro Headquarters	2910 E. 5 th St.	Austin	TX	78702
North Cross Transit Ctr	7700 Northcross Dr	Austin	TX	78757
South Con Transit Ctr	301 W. Ben White Blvd.	Austin	TX	78704
North Lamar Transit Ctr	8001 U.S. Highway 183	Austin	TX	78758
Westgate Transit Ctr	2027 W. Ben White Blvd	Austin	TX	78767
Cedar Park	401 Discovery Blvd	Cedar Park	TX	78613
Highland Station	6420 1/2	Austin	TX	78751
MLK Station	1719 Alexander Ave.	Austin	TX	78702
Kramer Station	2427 ½ Kramer Lane	Austin	TX	78758
Leander Station	800 North U.S. Highway 183	Leander	TX	78641
Downtown Station	408 E. 4 th St.	Austin	TX	78701
Plaza Saltillo Station	412 Comal St	Austin	TX	78702
Howard Station	3705 W. Howard Lane	Austin	TX	78759
Manor Park and Ride	201 W. Carrie Manor Rd.	Manor	TX	78653
Oak Hill Park and Ride	6501 W. 290/71 Hwy	Austin	TX	78735
Triangle Park and Ride	4800 Guadalupe St.	Austin	TX	78751
Techridge Park and Ride	900 Center Ridge Dr.	Austin	TX	78753
Great Hills Park and Ride	10500 Jollyville Rd.	Austin	TX	78748
Pavillion Park and Ride	12400 N. Hwy. 183	Austin	TX	78759
Capital Metro Administrative Annex/Child Care Facility	624 Pleasant Valley	Austin	TX	78702
MetroAccess Services Facility	509 Thompson Lane	Austin	TX	78742
MetroAccess Overflow Parking and Facility	414 Thompson Lane	Austin	TX	78742
North Operations Facility	9315 McNeil Road	Austin	TX	78758
Project Connect Community Office	607 Congress Avenue	Austin	TX	78701

In order to help the LEP population, the Notice is translated into Spanish. However, the latest American Community Survey 2018 data of the Capital Metro service area shows that there are six additional languages that meet the Safe Harbor provision threshold of 1,000 to receive translation of vital documents. These are: Vietnamese, Chinese (Mandarin), Korean, Arabic, Telugu, and Punjabi. In addition, Burmese, Pashto, and French are added to this list because of a large refugee population that may need assistance in these languages. To fulfil the Title VI requirement, the contact information is provided in Vietnamese, Chinese (Mandarin), Korean, Arabic, Telugu, Punjabi, Burmese, Pashto, and French - if the information is needed in those languages (See page 15). Capital Metro will add these languages to its website and soon be posting the updated Notice at the locations mentioned above.

Capital Metro has a Title VI Brochure available in English and Spanish that provides the public more information regarding Title VI. It will be translated into all Safe Harbor languages in the near future. Digital copies of Capital Metro's updated Notice on the bus and website are provided on the following pages. This placard for the buses will be on production once this Title VI Program update is approved by the FTA.

A-1. Title VI Notice

TITLE VI: NOTICE/AVISO



Capital Metro 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 protected by Title VI of the Civil Rights Act of 1964, as amended ("Title VI").

If you believe you have been subjected to discrimination under Title VI, you may file a complaint with Capital Metro or get more information —

via mail: Title VI Complaints, 2910 E. 5th Street, Austin, TX 78702

via e-mail: titlevicomplaints@capmetro.org via phone: (512) 474-1200

If this information is needed in another language, please contact (512) 474-1200.

如果您對以上的資料有興趣，而需要中文版的話，請聯絡 (512) 474-1200。

정보가 다른 언어로 필요한 경우, (512) 474-1200 로 연락 주시기 바랍니다.

Nếu thông tin này cần thiết trong ngôn ngữ khác, xin vui lòng liên lạc số (512) 474-1200.

شكراً جزيلاً. (512) 474-1200. في حال الحاجة لهذه المعلومات بلغة أخرى، الرجاء الإتصال بـ
که دا معلومات په بله ژبه کې پکار وي، نو مهرباني وکړئ په 512-474-1200 باندي تماس ونیسئ.

Capital Metro se compromete a que ninguna persona sea excluida de participar, o se le niegue beneficios de sus servicios a base de raza, color o origen de nacionalidad como protección del Título VI (Title VI) del Acto de Derechos Civiles, como amendado ("Title VI").

Si usted creé que usted ha sido discriminado bajo el Titulo VI, usted puede someter una queja con Capital Metro o consigue más información —

por correo: Title VI Complaints, 2910 E. 5th Street, Austin, TX 78702

por correo electrónico: titlevicomplaints@capmetro.org por teléfono: (512) 474-1200

ఈ సమాచారాన్ని వేరే భాషలో పొందాలనుకుంటే, దయచేసి 512-474-1200 నంబర్ వద్ద సంబంధించండి.

ਜੇਕਰ ਤੁਹਾਨੂੰ ਇਹ ਜਾਣਕਾਰੀ ਕਮਿ ਹੋਰ ਭਾਸ਼ਾ ਵਿੱਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਕਰਿਪਾ ਕਰਕੇ 512-474-1200 'ਤੇ ਸੰਪਰਕ ਕਰੋ।

ဤသတင်းအချက်အလက်ကို အခြားဘာသာစကားဖြင့် ရရှိလိုပါက ကျေးဇူးပြု၍ 512-474-1200 သို့မဟုတ် ဆက်သွယ်ပါ။

Si ces informations sont requises dans une autre langue, veuillez appeler le 512-474-1200.

A-2. Title VI Notice on the Capital Metro Website

Your Rights under Title VI of the Civil Rights Act of 1964



Title VI, [42 U.S.C. § 2000d et seq.](#), was enacted as part of the Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Compliance with Title VI of the Civil Rights Act of 1964 is a federal mandate for all agencies providing public services. Title VI applies to all aspects of the services provided by Capital Metro which are required to be provided without regard to race, color or national origin. In addition, agencies must also comply with Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency".

Capital Metro has a designated Title VI Officer who coordinates and oversees program requirements when implementing fare and service changes as well as any other areas requiring Title VI compliance.

Process

Capital Metro 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 protected by Title VI of the Civil Rights Act of 1964, as amended ("Title VI").

If you believe you have been subjected to discrimination under Title VI, you may file a complaint with Capital Metro - Attn: Title VI Complaints at 2910 E. 5th Street, Austin, TX 78702 or via e-mail at titlevicomplaints@capmetro.org or call (512) 474-1200.

[Title VI Brochure](#) [PDF]

[Title VI Complaint Form](#) [PDF]

Title VI complaints must be filed within 180 days from the date of the alleged discrimination. Capital Metro will investigate the complaint and will provide a determination. If you disagree

with the determination, you can appeal and submit your complaint to:
 Federal Transit Administration, Office of Civil Rights
 819 Taylor Street, Room 8A36
 Fort Worth, TX 76102
 or call (817) 978-0558

Proceso de Quejas del Título VI (Title VI) Programa de Derechos Civiles

Capital Metropolitan Transportation Authority se compromete a que ninguna persona sea excluida de participar, o se le niegue beneficios de sus servicios a base de raza, color o origen de nacionalidad como protección del Título VI (Title VI) del Acto de Derechos Civiles, como amendado ("Title VI"). Si usted creé que usted ha sido discriminado bajo el Título VI, usted puede someter un queja por escrito con Capital Metro - Attn: Title VI Complaints en 2910 E. 5th Street, Austin, TX 78702 o por correo electrónico a titlevicomplaints@capmetro.org o llame (512) 474-1200 [Título VI Brochure en español](#) [PDF]

Las quejas correspondientes al Título VI deben presentarse dentro de 180 días a partir de la fecha en que tuvo lugar el supuesto acto de discriminación. Capital Metro investigará la queja y dará un determinación. Si la determinación no le es satisfactoria, usted puede apelar y someter su queja a la

Administración de Transito Federal—Office of Civil Rights
 819 Taylor Street, Room 8A36
 Fort Worth, TX 76102
 o llame (817) 978-0558

民權法案第六項("Title VI")的申訴程序

依《民權法案》第六章提出的歧視申訴應於歧視事發當日起 180 天內提出。奧斯丁首都捷運局, 依據 1964 年的民權法案第六項("Title VI")的修正規定, 致力於確保沒有任何一個人會因為其種族、膚色或其原住國家的不同, 而被排除於活動參與之外, 或被拒絕提供其所應享有的福利。如若您受到前述第六項中的任何歧視, 請向奧斯丁首都捷運局的下列管道申訴:

信件請寄 Title VI Complaints at 2910 E. 5th Street, Austin, TX 78702,

寄電子郵件至 titlevicomplaints@capmetro.org 或打電話至 512-474-1200.

"시민권법 6장" 위반 불평 제기 절차

타이틀 VI[Title VI] 소장은 주장하는 차별혐의가 있던 일자로부터 반드시 180일 이내에 접수되어야 합니다. 오스틴 시 캐피탈 메트로 교통공단은 1964년의 시민권법 제 6장에 따라 어느 누구도 인종, 피부색, 또는 국적에 근거하여 당사에서 제공하는 서비스 혜택을 받지 못하는 일이 없도록 합니다.

만약 시민권법 6장을 위반하는 차별대우를 받았을 경우, 우편이나 이메일, 혹은 전화로 불평을 제기하실 수 있습니다.

주소:

Attn: Title VI Complaints

2910 E. 5th Street, Austin, TX 78702

이메일: titlevicomplaints@capmetro.org

전화번호: 512-474-1200

QUI TRÌNH KHIẾU NẠI DƯỚI ĐIỀU KHOẢN SỐ VI (TITLE VI)

Đơn khiếu nại theo Tiêu Đề VI phải được nộp trong vòng 180 ngày kể từ ngày xảy ra sự việc bị cáo buộc là phân biệt đối xử. Hãng Xe Buýt Capital Metropolitan cam kết đảm bảo rằng không một người nào bị loại trừ hoặc từ chối sử dụng các dịch vụ xe buýt vì lý do sắc dân, màu da, hoặc chủng tộc như được bảo vệ dưới điều khoản số VI Đạo luật Nhân Quyền ban hành năm 1964, như đã được tu chính ("Title VI"). Nếu quý vị nghĩ rằng mình là nạn nhân bị kỳ thị dưới điều khoản số VI, quý vị có thể làm đơn khiếu nại gửi về Capital Metro, theo địa chỉ:

Title VI Complaints, địa chỉ 2910 East 5th Street, Austin, TX 78702,

hoặc gửi điện thư về : titlevicomplaints@capmetro.org

hoặc gọi điện thoại số : 512-474-1200

시민권법 6장" 위반 불평 제기 절차

타이틀 VI[Title VI] 소장은 주장하는 차별혐의가 있던 일자로부터 반드시 180일 이내에 접수되어야 합니다. 오스틴 시 캐피탈 메트로 교통공단은 1964년의 시민권법 제 6장에 따라 어느 누구도 인종, 피부색, 또는 국적에 근거하여 당사에서 제공하는 서비스 혜택을 받지 못하는 일이 없도록 합니다. 만약 시민권법 6장을 위반하는 차별대우를 받았을 경우, 우편이나 이메일, 혹은 전화로 불평을 제기하실 수 있습니다.

주소:

Attn: Title VI Complaints

2910 E. 5th Street, Austin, TX 78702

이메일: titlevicomplaints@capmetro.org

전화번호: 512-474-1200

[Title VI complaint form](#) [PDF]

타이틀 VI 이의제기는 반드시 주장하는 차별 행위가 발생한 일자로부터 180일 이내에 접수해야 합니다. Capital Metro에서는 해당 이의제기에 관한 조사를 실시하고 결정을 내립니다. 결정 내용에 동의하지 않으실 경우, 귀하는 다음으로 이의제기 및 불만사항의 제기도 가능합니다:

Federal Transit Administration, Office of Civil Rights

819 Taylor Street, Room 8A36

Fort Worth, TX 76102

또는 817-978-0558 번으로 전화하십시오.

الباب السادس إجراءات الشكوى

لسنة 1964، وتعديلاته (المُشار إليه باسم "الباب السادس")

إذا كنت تعتقد أنك قد تعرضت للتمييز بمقتضى الباب السادس، يمكنك تقديم شكوى لدى مترو العاصمة -معنوناً الشكوى باسم: شكوى الباب أو عبر البريد الإلكتروني. 1200-474-512 أو من خلال ، E. 5th Street, Austin, TX 78702 ، الباب السادس، على عنوان 2910 titlevicomplaints@capmetro.org الاتصال بالرقم

[Title VI complaint form](#) [PDF]

يجب تقديم شكوى الباب السادس في غضون 180 يومًا من تاريخ ادعاء التمييز. ستقوم مترو العاصمة بالتحقيق في الشكوى واتخاذ القرار. إذا لم توافق على القرار، يمكنك الاستئناف وتقديم شكواك إلى: مكتب الحقوق المدنية، إدارة النقل الفيدرالية

819 Taylor Street, Room 8A36

Fort Worth, TX 76102

أو الاتصال بالرقم 817-978-0558.

If you need this information in any other language, contact Diponker Mukherjee:

diponker.mukherjee@capmetro.org

512-369-6255

(We are in process of adding our Title VI Process translated into Telugu, Punjabi, Burmese, Pashto, and French to our website.)

B. TITLE VI COMPLAINT PROCEDURES

This section provides Capital Metro's current Title VI complaint procedures and proposed future changes to the Title VI complaint procedures.

B-1. Title VI Complaint Investigation Procedures

Title VI of the Civil Rights Act of 1964 is Federal Law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive Federal financial assistance. Any individual who feels they have been discriminated against has the right to file a complaint within 180 days of the alleged discrimination.

If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with Capital Metro by mail to Attn: Title VI Complaints at 2910 E. 5th Street, Austin, TX 78702, by email at titlevicomplaints@capmetro.org or by calling (512) 474-1200.

Capital Metro will investigate complaints and will provide a written determination. Any Title VI related calls referred by the Customer Service Call Center, written complaints received by U.S. mail or electronic mail will be investigated by the Title VI Officer with attorney consultation to determine if they warrant further investigation. This may include interviews with the complainant and operator as well as reviewing the video evidence.

Investigation Procedures:

1. Using broad criteria, relevant calls will be identified through Capital Metro's Customer Service Call Center and referred to the Title VI Officer through a Customer Comment Report or CCR.
2. The Title VI Officer or Customer Service will send an acknowledgement letter to the complainant if an address is available.
3. The Title VI Officer will seek further information on a particular Title VI complaint from Customer Service or at weekly CCR review meeting.
4. The Title VI Officer will consult with Capital Metro Legal Department on an "as needed" basis to review referrals from the Customer Service Call Center or written complaints received via U.S. Mail or Electronic Mail. All Title VI complaints received through phone, surface mail, or email will be monitored by the Office of Diversity. A preliminary determination will result in either:
 - the Title VI officer conducting and documenting the investigation; or

- a written rationale to the complainant as to why the call is not being considered as a Title VI complaint.
5. The Title VI Officer will review documentation on any and all aspects of the investigation.
 6. The Title VI Officer will issue a written determination for each and every complaint referred.
 7. The determination may or may not recommend action.
 8. The complainant will be informed of the determination.
 9. Action will be taken if applicable. All action will be documented.
 10. All documentation will be filed and made available for public access.

If claimant disagrees with the determination, claimant can appeal to the Federal Transit Administration (FTA) Office of Civil Rights, 819 Taylor Street, Room 8A36, Fort Worth, TX 76102 or by calling (817) 978-0558.

B-2. Proposed Future Changes to the Title VI Complaint Procedures.

Capital Metro is changing its Title VI Complaint Procedures to further align with the Circular. The revised complaint procedures are provided below.

Capital Metro is committed to ensuring that no person is excluded from participation in or denied the benefits of transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964, as amended ("Title VI").

*If you believe you have been discriminated against on the basis of race, color, or national origin, you may file a complaint with Capital Metro by completing and submitting Capital Metro's [Title VI Complaint Form](#) and submitting it by mail to **Attn: Title VI Complaints at 2910 E. 5th Street, Austin, TX 78702** or via e-mail to titlevicomplaints@capmetro.org. If you need assistance filing a written complaint, please contact [dedicated OOD #]. Capital Metro investigates completed, written complaints received no more than 180 days after the alleged incident.*

Capital Metro will take the following steps once a complaint is received:

1. *The complaint is reviewed by the Office of Diversity (OOD) to determine if Capital Metro has jurisdiction. Capital Metro will provide an acknowledgment letter informing the complainant whether the complaint will be investigated.*
2. *Capital Metro will use its best efforts to investigate the complaint within 90 calendar days of its receipt. If additional information is needed, the OOD will contact the complainant by phone or in writing. Failure of the complainant to respond within 15 days of the request for information may*

result in the administrative closure of the complaint. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

3. *Capital Metro will issue one of the following determination letters:*
 - a. *A closure letter that states that there was not a Title VI violation and that the case will be closed.*
 - b. *A letter of finding that explains whether any disciplinary action, additional training, or other action will occur.*

*If you disagree with the determination, you can appeal and submit your complaint to:
Federal Transit Administration, Office of Civil Rights
819 Taylor Street, Room 8A36
Fort Worth, TX 76102
Or call 817-978-0558*

B-3. Title VI Complaint Form in English

Capital Metro's Title VI complaint form is set forth below. This form is available on Capital Metro's website and as a hardcopy.



Title VI Complaint Form Capital Metropolitan Transportation Authority

Capital Metro 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 the 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.

The following information is necessary to assist us in processing your complaint. If you require assistance in completing this form, please contact the Title VI Officer at (512) 474-1200 or titlevicomplaints@capmetro.org. The completed form must be returned to Capital Metro, ATTN: Title VI Complaints, 2910 E. 5th Street, Austin, TX 78702.

SECTION 1

Your Name: _____

E-mail address: _____

Daytime phone: _____

Evening phone: _____

Address: _____

Accessible format requirements: (check all that apply)

☐ Large print ☐ Audio tape ☐ TDD ☐ Other (specify): _____

Are you filing this complaint on your own behalf? Yes ☐ No ☐ (If yes, go to Section 2)

If not, please supply the following information:

Name of person for whom you are complaining: _____

Relationship to you: _____

Please explain why you have filed for this person: _____

Please confirm that you have obtained the permission of this person to file this complaint on their behalf. Yes ☐ No ☐

SECTION 2

Date of incident: _____

Which of the following best describes the reason the alleged discrimination took place?
(Check one)

☐ Race ☐ Color ☐ National Origin (including limited English proficiency)

Please describe the alleged discrimination incident. Include any specific details if available including names, dates, times, route numbers, witnesses and any other information that would assist us in our review of your complaint. Explain what happened and whom you believe was responsible. Please use additional pages if additional space is required.

Have you filed a complaint on this incident with any other federal, state or local agencies? Yes ☐
No ☐

If yes, please provide the following information:

Agency Name: _____

Agency Address: _____

Contact Name: _____

Phone: _____

I affirm that I have read the above complaint and that it is true to the best of my knowledge, information and belief.

Signature of Complainant

Date

For internal use only:

Date Received: _____ Received by: _____

B-3. Title VI Complaint Form in Spanish



Formulario de Quejas del Título VI Autoridad de Transporte Capital Metropolitan

Capital Metro está comprometido a garantizar que ninguna persona sea excluida de participar en o de recibir los beneficios de sus servicios, debido a raza, color u origen nacional, conforme establece el Título VI de la Ley de Derechos Civiles de 1964 y enmiendas. Las quejas conforme al Título VI deben presentarse en el transcurso de 180 días de haber ocurrido la supuesta discriminación.

Es necesario obtener la siguiente información para ayudarnos a procesar su queja. Si requiere ayuda para llenar este formulario, por favor, llame al representante del Título VI, al (512) 369-6255 o visite titlevicomplaints@capmetro.org. El formulario completo debe enviarse a Capital Metro, ATTN: Title VI Complaints, 2910 E. 5th Street, Austin, TX 78702.

SECCIÓN 1

Su nombre

Correo electrónico

Teléfono diurno

Teléfono nocturno

Dirección

Requisitos accesibles del formulario (seleccione todos los que apliquen):

- ☐ Letra grande
- ☐ Cintas de audio
- ☐ TDD
- ☐ Otro (especifique): _____

¿Presenta esta queja a nombre propio? Sí ___ No ___

Si la respuesta es sí, vaya a la SECCIÓN 2.

Si la respuesta es no, por favor, incluya la siguiente información:

- Nombre de la persona por la que presenta la queja
- Relación con usted
- Por favor, explique porqué presenta la queja para esta persona
- Por favor, confirme que haya obtenido permiso de esta persona para presentar esta queja en su nombre. Sí _____ No _____

SECCIÓN 2

Fecha del incidente: _____

¿Cuál de lo siguiente describe mejor la razón por la que ocurrió la supuesta discriminación?
(Marque una)

- Raza
- Color
- Origen nacional (incluyendo manejo limitado del idioma inglés)

Por favor, describa el incidente de la supuesta discriminación Incluya cualquier detalle específico, si lo tiene, incluyendo nombres, fechas, horas, números de rutas, testigos y cualquier otra información que pueda ayudarnos a revisar su queja. Explique qué sucedió y a quién considera responsable. Por favor, use páginas adicionales si requiere más espacio.

¿Ha presentado queja de este incidente ante otras agencias federales, estatales o locales? Sí____
No____

De ser sí, por favor proporcione la siguiente información:

- Nombre de la agencia: _____
- Dirección de la agencia: _____
- Nombre del contacto: _____
- Teléfono: _____

Declaro que leí la queja anterior y que es verdadera en la medida de mi conocimiento, información y consideración.

Firma de la persona presentando la queja Fecha

Sólo para uso interno:

Fecha de recepción: _____ Recibido por: _____

(WE ARE IN THE PROCESS OF ADDING COMPLAINT FORMS IN CHINESE(MANDARIN), VIETNAMESE, KOREAN, ARABIC, TELUGU, PUNJABI, BURMESE, PASHTO, AND FRENCH ON OUR WEBSITE)

C. RECORD OF TITLE VI INVESTIGATIONS, LAWSUITS, OR COMPLAINTS

Capital Metro has not been involved in any Title VI investigations or lawsuits since the time of the last submission. Capital Metro has received Title VI complaints, primarily through its titlevicomplaints@capmetro.org email account. A summary of the complaints is provided in **Table 2. Summary of Title VI Complaints (2018 - 2020)**.

Capital Metro included FTA Complaint No. 2017-0326 in its last submission and noted that the complaint was pending an investigation by FTA. The complaint was related to Cap Remap Austin, the system-wide service change Capital Metro implemented as a result of its Connections 2025 10-year transit plan. The complaint alleged that the changes would have a disparate impact and disproportionate burden on minority and low-income populations. FTA reviewed the Cap Remap Austin information, and found that Capital Metro complied with Title VI requirements and there was not a violation. FTA closed the complaint in April 2018.

C-1. Summary of Title VI Complaints

Table 2. Summary of Title VI Complaints (2018 - 2020)

Date Filed	Summary of Complaint	Status / Action Taken	Date Closed
5/23/18	Complaint regarding Cap Remap. Complainant was concerned about the discrimination that appeared to be present in the new system. Complainant alleged that large sections of east Austin would lose service and not be served by a bus stop without a very long walk. Complainant alleged that there were many areas that this would affect. The complainant alleged that the CapRemap created an adverse impact on minority and low-income populations.	It was addressed to FTA. No action was necessary because it was a similar complaint on Cap Remap that was addressed by FTA. However, it was shared with appropriate Capital Metro departments.	5/23/18
5/24/18	Complainant alleged that Cap Remap route changes apparently violated Title VI of the 1964 Civil Rights Act on the basis of color.	It was also copied to FTA. No action was necessary because it was a similar complaint on Cap Remap that was addressed by FTA. However, it was shared with appropriate Capital Metro departments.	5/24/18
6/22/18	Complaint on Cap Remap on the basis of race.	It was also copied to FTA. No action was necessary because it was a similar complaint on Cap Remap that was addressed by FTA. However, it was shared with appropriate Capital Metro departments.	6/29/18
10/22/18	Complaint alleged that January 2019 service change and elimination of Route 240 created disparate impact on the basis of race.	It was also copied to FTA. No action was necessary because it was a similar complaint on Cap Remap that was addressed by FTA. However, it was shared with appropriate Capital Metro departments.	10/22/18
12/4/18	Complainant alleged that Route 392 time-point created a disparate impact on the basis of race.	No action was necessary because it was a similar complaint on Cap Remap that was addressed by FTA. However, it was shared with appropriate Capital Metro departments.	12/4/18
2/21/19	Complaint alleged that northeast Austin bus routes were inequitable and created a disparate impact on race.	It was also copied to FTA. No action was necessary because it was a similar complaint on Cap Remap that was	4/18/19

Attachment: TITLE VI COMPLIANCE REPORT Final (4889 : Approval of Title VI Policy Revisions)

		addressed by FTA. However, an acknowledgement was sent to the complainant.	
3/8/19	Complaint alleged that a Black operator 600349/600345 running bus 325 on March 8 at 3 p.m. didn't lower the bus for seniors with heavy load. Complainant stated they are a senior of bad shape, minority too. Complainant alleged driver only lowered bus for Black customers.	The complaint was unsubstantiated. The bus or operator information couldn't be verified to investigate. No additional information was available.	3/8/19
10/22/19	Complaint regarding overflowing trashcans, Route 392 is neglected -- infrequent, unreliable, and disconnected for transit-dependent riders, but the bus connects with MetroRail-Kramer, instead. Complainant alleged discrimination on the basis of race.	No action was necessary because it was a similar complaint on Cap Remap that was addressed by FTA. However, an acknowledgement was sent to the complainant.	10/28/19
1/23/20	Complainant alleged that APD has a strong bias against Blacks, yet Capital Metro employs a high number of APD officers which brings to bias to all levels of Capital Metro service. Complainant asked why Capital Metro changed its Camp Texas drop-off policy.	This complaint was related to larger agency practices on contracting with APD and didn't necessarily allege an incident of discrimination on the basis of race, color or national origin. The route was established for the service to the TxDOT camp for homeless individuals. Determined the customer wished to be dropped off where she wanted to go, instead of the designated stops. We acknowledged the complaint and operations responded to customer to address this issue.	1/29/20
11/27/20	Complainant concerned about violation of privacy. Complainant alleged that drivers who work for the Austin Police Department, and who drive the bus when off duty, release certain information about individuals or make remarks about on-going and well pending cases more towards Black riders and the drivers have shown discrimination towards customer and other homeless Black individuals.	The complaint was unsubstantiated. Reviewed complaint with Security Department. APD Officers who drive Capital Metro buses do not carry customers. They only transport APD Officers during police related operations. Complainant was unresponsive to provide more information.	12/11/20

D. INCLUSIVE PUBLIC PARTICIPATION PLAN

This section includes Capital Metro's Community Involvement Policy along with and a summary of Capital Metro's public outreach and engagement activities.

D-1. Community Involvement Policy

The following policy was adopted by the Board on August 26, 2019.

PURPOSE:

The Board of Directors believes that effective community involvement improves the quality of decision-making processes and builds trust in Capital Metro. This policy ensures that Capital Metro integrates, in a meaningful way, the knowledge and opinions of its many stakeholders into its decision-making processes.

POLICY:

1. Capital Metro will maintain a comprehensive community involvement program that includes plans for receiving public comments for major decision-making processes including, but not limited to, policy development, strategic planning, budgeting, capital projects planning, fare adjustments and transit service changes. Capital Metro's Community Involvement Program will include:
 - a. Methods to provide the public with access to accurate, understandable, and timely information to facilitate effective involvement in-the decision-making process;
 - b. Methods to ensure a diverse range of stakeholders are engaged in the process;
 - c. Methods of providing the community with a sound understanding of the pertinent issues and options Capital Metro is considering;
 - d. Methods to ensure information and activities are accessible to stakeholders with disabilities and/or limited English proficiency; and
 - e. Methods to ensure that the public has an opportunity to comment on board matters before a vote on the matters occur.
2. The Board of Directors shall not utilize a consent agenda nor expedite consideration of board matters at board meetings unless it is for routine, noncontroversial matters. "Routine, non-controversial matters" for placement on the Board Consent Agenda include, but are not limited to, the following items:
 - a. Contracts and agreement for the normal operation of a business, such as business services or furniture purchases, regardless of the dollar value.
 - b. All other contracts with a value less than \$5 million.

Items that should not be considered for placement on the Board Consent Agenda include, but are not limited to, the following items:

 - c. Substantive changes to Board adopted policies.
 - d. Actions requiring a public hearing such as fare and service changes.
3. Capital Metro staff will annually provide the Board of Directors with a workplan memorandum outlining major opportunities for the public to provide comments on significant board matters and a quarterly memorandum updating the Board on current outreach activities. Significant board matters for which Capital Metro will always seek

community input include, but are not limited to, the approval of the annual budget, service changes, and fare changes.

4. Capital Metro will seek community input that reflects all points of view and will carefully consider this input when making decisions.
5. Capital Metro will work to ensure that decision-making processes are open and accessible to all interested parties, including but not limited to:
 - a. Those with limited financial and technical resources.
 - b. Persons with limited English proficiency.
 - c. Persons with disabilities.
 - d. Those with limited past experience participating in transportation decision-making.

THE BOARD OF DIRECTORS RESERVES THE RIGHT TO WAIVE THIS POLICY AND THESE PROCEDURES WHEN NECESSARY TO CONDUCT BOARD MEETINGS EFFICIENTLY AND EFFECTIVELY.

D-2. Process of Community Engagement and Outreach

The following represents a compilation of the Capital Metro Community Engagement Team's work plans and is a general reflection of activities undertaken to ensure Capital Metro has more than sufficiently met the objectives of Title VI and further made aware, presented an opportunity, and meaningfully involved groups traditionally unengaged around policy decision-making and participatory transit planning processes, that could potentially impact said groups from 2017 through 2020. These efforts are realized and driven by the Capital Metro Board's Community Involvement Policy. This policy is inclusive to ensure that decision-making processes are open and accessible to all interested parties, including but not limited to, minorities and low-income populations as well as persons with Limited English Proficiency (LEP) and disabilities.

The Community Engagement Team is deployed geographically throughout Capital Metro's service area and outlying areas. Each individual Community Engagement Team member also is responsible for liaising with stakeholder groups across the service area that include, but are not limited to seniors, youth, refugees, ethnic minorities, LEP populations, persons with disabilities, individuals experiencing homelessness, schools, and many other business and neighborhood organizations.

When Capital Metro seeks feedback on an agency-wide initiative or decision, a cross-departmental team is assembled to coordinate meaningful engagement of stakeholders in the decision-making process. Before each community outreach or engagement activity hosted by Capital Metro, the team prepares with appropriate departments such as Planning, Communications, Marketing, Office of Diversity, Government Relations, Customer Service, and Operations to determine the best methods to reach targeted populations and ensure inclusion of minority, disabled, and LEP populations. Staff develops and implements plans to proactively engage populations that traditionally do not participate in public involvement activities, including minorities, low-income, LEP groups and persons with disabilities. Methods include conducting on-board and at-stop outreach at strategic

locations where such populations are typically present, including ad-hoc meetings at bus stops and transit facilities, public libraries, and community recreation centers, surveys, and general outreach at community-wide and targeted events. Further, the Community Engagement Team partners with several non-profit, social-service, higher education and business organizations to provide information regarding public involvement activities to their clients, who are typically, comprised of populations traditionally under-represented in public involvement activities. A representative list of partner organizations is provided later in this section.

Capital Metro public meetings are only held in locations that are accessible to persons with disabilities and via transit. Route numbers are always listed on public materials related to meetings and the Authority's MetroAccess call center is given advanced notice for the purposes of facilitating paratransit reservations. A representative listing of public meeting locations is included in this report. Public meeting materials are made available in accessible formats upon request, and outreach and engagement staff, both of which are represented on Capital Metro's Planning and Community Involvement teams, provide opportunities for interpretation in multiple languages to facilitate communication with LEP groups. MetroAccess staff is also readily available to assist with special arrangements to accommodate for persons who experience disabilities.

Capital Metro has formal partnerships with minority chambers of commerce (Hispanic, Asian, Black, Gay and Lesbian, and Young) to assist in making public information available in multiple languages, as well as contracts with professional translation and interpretation services to further make information available to those who do not speak English. Since the last report, Capital Metro has continued to increase the number of Asian languages our materials are produced in and have placed ads regularly in Mandarin and Vietnamese newspapers.

As a part of our outreach efforts regarding public participation processes, Capital Metro routinely updates its partners and reminds groups of opportunities to engage in the decision-making process. Furthermore, Capital Metro encourages its partners to pass along information about opportunities to participate via newsletters, list serves, social media platforms, and any other information/media channels partner organizations utilize to reach each of the partners' respective constituencies. When appropriate, Capital Metro directly collaborates with its various partners to involve and engage stakeholders in public participation opportunities.

Outreach occurs via several methods when Capital Metro undertakes comprehensive public participation efforts. Staff engages the public in multiple ways, with emphasis on meeting stakeholders where they congregate, and using innovative methods to involve stakeholders in the decision-making process, which is aligned with Capital Metro's strategic plan goals. In spring of 2020, like other agencies, Capital Metro conducted outreach virtually via the Zoom platform. Language interpretation was available at all public meetings. Capital Metro also worked with partner organizations to reach individuals who might not be able to engage via computer or mobile

device. Capital Metro has conducted more than 1,500 outreach activities during the last three years. For Project Connect, staff has engaged over 70,000 individuals alone. Community Engagement staff has also increased participation in service planning surveys, which are also made available in multiple languages.

Below is a sample list of communication and engagement methods deployed when involving the public, along with a sample list of partner organizations.

- Online discussion forums
- Social Media
 - Facebook: facebook.com/capitalmetro
 - Twitter: @CapMetroATX
- Email:
 - feedback@capmetro.org
- Public open houses
- At-stop outreach
- On-board outreach
- Bilingual brochures aboard vehicles
- Webinars
- Project-specific webpages on www.capmetro.org
- At-stop signage
- Legal print notices
- Blogposts
- Media Advisories
- Infographics
- Rider alerts via subscriber list
- Partner newsletters
- Passenger notices aboard vehicles
- Direct mail
- Block-walking
- Bus Wraps
- Bus placards
- Television Talk Shows
- Billboard Advertisements
- Capital Metro Mobile App
- Advertisements
- Web Advertisements
- Radio
- Print
- Videos
- Community Calendars

D-3. List of Partner Organizations

- The University of Texas at Austin
- ADAPT of Central Texas
- Austin Community College (ACC)
- Alliance for Public Transportation
- Austin Justice Coalition
- Capital Area Metropolitan Planning Organization (CAMPO)
- Community Advancement Network (CAN)
- City of Austin
- Austin Transportation Department
- AURA
- Downtown Austin Alliance
- Dress for Success
- Greater Austin Chamber of Commerce
- Greater Austin Hispanic Chamber of Commerce
- Austin Young Chamber of Commerce
- Greater Austin Black Chamber of Commerce
- Greater Austin Asian Chamber of Commerce
- Austin Gay and Lesbian Chamber of Commerce
- Network of Asian American Organizations
- Congress for the New Urbanism Central Texas Chapter
- Sixth Street Merchants
- East Cesar Chavez Planning Team
- Austin Cycling Association
- Movability Austin
- Bike Austin
- Pedestrian Advisory Council (PAC)
- Bike Advisory Council (BAC)
- Downtown Commission (DAC)
- Neighborhood Association list serves
- One Voice Central Texas
- Austin Independent School District
- Del Valle Independent School District
- Round Rock Independent School District
- Manor Independent School District
- Pflugerville Independent School District
- Lago Vista Independent School District
- Leander Independent School District
- American Youthworks
- Adapt of Texas
- AGE of Central Texas
- AIDS Services of Austin
- Any Baby Can
- ARC of the Capital Area
- ARCIL
- Assistance League of Austin
- Austin Area Urban League
- Austin Community College
- Austin Council of the Blind (ACB)
- Austin Energy
- Austin Groups for the Elderly
- Austin Housing Authority
- Austin Interfaith
- Austin Latino Lesbian/Gay Organization (ALLGO)
- Austin Pain Associates
- Austin State Hospital
- Austin Steam Train Association
- Austin Task
- Austin Tenants' Council
- Austin Travis County Integral Care
- Austin Travis County MHMR Center
- Austin Travis County MHMR Center CARE Unit

- African-American Youth Harvest Foundation
- Austin/Travis County HHS
- Ballet Austin
- Paramount Theater
- Big Brothers Big Sisters of Central Texas
- Blackland Community Development Corporation
- Central Health
- Capital Area Food Bank of Texas
- Capital Area Mental Health Center
- Williamson County Probation Office
- Capital IDEA, Inc.
- Care Communities
- Caritas
- Casa Marianella
- Casa of Travis County
- Catholic Charities of Central Texas
- Center for Child Protection
- Central Texas VA Clinic
- Central Texas Veterans Health Care System
- Child, Inc.
- Children at Heart Foundation
- Children's Dialysis Clinic of Central Texas
- City of Austin ADA Office
- City of Round Rock
- Coalition for Texans with Disabilities
- Communities in Schools (CIS)
- Conley-Guerrero Center
- Creative Action
- Criss Cole Rehabilitation Center
- DaVita Dialysis clinics
- Disability Rights Texas
- Down Syndrome Association of Central Texas
- Easter Seals Central Texas
- ECHO
- Elder Haven
- Environmental Corps - Youth Works
- Faith in Action Caregivers
- Family Eldercare
- Financial Literacy Coalition
- Foundation for the Homeless
- Front Steps
- Go Austin! Vamonos Austin! (GAVA)
- Georgetown Health Foundation
- Georgetown Special Education Foundation
- Goodwill
- Greater Calvary Rites of Passage Development, Inc.
- Habitat for Humanity of Williamson County
- Health South Rehabilitation Center
- Drive-a-Senior
- Hispanic Women's Network of Texas - Austin Chapter
- Hispanic Advocates Business Leaders of Austin
- Home Builders Association of Greater Austin
- Housing Authority of the City of Austin
- iACT
- Inter-Agency Council on Aging
- Intellectual and Developmental Disabilities Coalition
- Jewish Family Services
- LULAC
- Lakeside Development
- Leadership Enrichment Arts Program
- Lifeskills
- Lifeworks

- Lighthouse for the Blind
- Liveable City Austin
- LiveStrong Cancer Navigation Center
- Mary Lee Foundation
- Meals on Wheels and More
- Movability ATX
- NAACP
- National Federation for the Blind of Central Texas
- Out Youth Austin
- People United for Mobility Action (PUMA)
- Planned Parenthood of Texas Capital Region
- Project Transitions
- Reading is Fundamental of Austin
- Rebecca Baines Johnson Center
- River City Youth Foundation
- Round Rock Area Serving Center
- Rotary Club of Austin
- Safe Place
- Self-Help Advocacy Center (SHAC)
- Salvation Army
- Seton Family of Hospitals
- Seton Total Health Partners
- Skillpoint Alliance
- Society of Saint Vincent de Paul
- St. Edwards University
- St. John's Recreational Center
- Sustainable Food Center
- Texas Fair Defense Project
- Texas School for the Blind and Visually Impaired
- Texas School for the Deaf and Hard of Hearing
- Texas Youth Commission
- The Real Estate Council of Austin, Inc.
- Travis County Department of Health & Human Services
- Travis County Health & Human Services, Family Support Services
- Travis County Health and Human Services & Veteran Services
- Travis County Hospital District
- Travis County Juvenile Court - Probation Department
- Travis County Services for the Deaf
- Travis County Veterans Services
- Trinity Center
- United Way Capital City
- United Way for Greater Austin
- United Way of Williamson County
- University of Texas - Services for Students with Disabilities
- Vaughn House
- Veteran's Administration
- Village of Marbridge/Marbridge Foundation, The
- WellMed
- Williamson County and Cities Health District
- Workers Assistance Program, Inc.
- Workforce Solutions
- WorkSource
- Young Women's Alliance
- Young Men's Business League

D-4. List of Outreach Activities (2018-2020)

The past three years were unusual for Capital Metro, as there were several high-profile initiatives for which public participation processes were conducted with stakeholders, customers, and the public. These included CapRemap, Capital Metro's launch of newly redesigned bus services; the launch of Pickup, the new on-demand service; and Project Connect, CapMetro's long-range high-capacity service plan. Capital Metro also welcomed a new President & CEO in March of 2018. Each of these came with a wide variety of public participatory opportunities in addition to typical engagement done for budget, capital projects and other service initiatives.

Capital Metro has hosted numerous public involvement opportunities across the service area to engage customers and non-customers alike, including but not limited to, minorities and low-income populations as well as persons with Limited English Proficiency (LEP) and disabilities. The majority of these opportunities involved going to where people were, rather than expecting them to attend the typical public meetings. These included at-stop outreach, on-board outreach, pop-up meetings, small group meetings, presentations, tabling at community events and, following the arrival of the pandemic in 2020, virtual engagement opportunities.

Below is a sample list of just the publicly posted engagement activities categorized by year and by initiative. It is by no means exhaustive.

2018

- **CEO Candidate Forum**
 - Monday, Jan. 8 (6 p.m. - 8 p.m.) AISD Performing Arts Center, 1500 Barbara Jordan Blvd. (Routes 37 and 320, MetroRail, Pickup)
- **Project Connect**
 - Wednesday, March 28 (4 p.m. - 8 p.m.) Austin Central Library 710 W. César Chávez St. (Served by downtown routes)
 - Wednesday, April 18 (4 p.m. - 8 p.m.) Traffic Jam! / Northeast Austin Mini-Jam Turner Roberts Recreation Center, 7201 Colony Loop Dr. (Routes 6 & 337)
 - April 28 (10 a.m. - 1 p.m.) Traffic Jam! / North Austin Mini-Jam, North Austin YMCA, 1000 Rundberg Ln. (Routes 1, 324, 801)
 - Saturday, May 5 (10 a.m. - 1 p.m.) Traffic Jam! / South Austin Mini-Jam LifeWorks Resource Center, 3700 S. 1st St. (Routes 10 and 315)
 - Tuesday, May 8 (4 p.m. - 8 p.m.) Traffic Jam! / Southwest Austin Mini- Hampton Branch Library, 5125 Convict Hill Rd, (Routes 315 and 333)

- Saturday, May 19 (10 a.m. – 1 p.m.) Traffic Jam! / Northwest Austin Mini-Westover Hills Church of Christ, 8332 Mesa Dr. (Route 19)

2019

• **Project Connect**

- Wednesday, May 8 (4 p.m. – 8 p.m.) Orange Line Open House Fulmore Middle School
- Thursday, May 9, 2019 (4 p.m. – 8 p.m.) Orange Line Open House Pleasant Hill Library
- Monday, May 13 (4 p.m. – 8 p.m.) Orange Line Open House Cambridge Towers, 1801 Lavaca St. (Route 803)
- Tuesday, May 14 (3 p.m. – 6 p.m.) Orange Line Open House South Congress Transit Center (Routes 1, 315, 801)
- Wednesday, May 15 (4 p.m. – 8 p.m.) Orange Line Open House North Austin Lions Club, 1103 Justin Ln. (Routes 1, 5, 801)
- Thursday, May 16 (4 p.m. – 8 p.m.) Orange Line Open House Little Walnut Creek Library, 835 W Rundberg Ln. (Routes 324, 801)
- Monday, May 20 (4 p.m. – 8 p.m.) Blue Line Open House Austin Central Library, 710 W. Cesar Chavez (downtown routes)
- Wednesday, July 24 (6 p.m. – 8 p.m.) North Austin Orange Line Workshop North Austin (Rundberg) YMCA, 1000 W Rundberg Ln (Routes 1, 324, 801)
- Tuesday, July 30 (4 p.m. – 8 p.m.) PC Blue Line Open House ACC Highland 6101 Highland Campus Dr. (Routes 7, 337)
- Wednesday, July 31 (4 p.m. – 8 p.m.) PC Blue Line Open House Austin Energy Townlake Center, 721 Barton Springs Rd. (Routes 7, 10)
- Thursday, August 1 (4 p.m. – 8 p.m.) Blue Line July-August 2019 Community Workshop Ruiz Branch Library, 1600 Grove Blvd. (Route 350)
- Wednesday, June 17 (4 p.m. – 8 p.m.) Blue Line Open House, Ruiz Branch Library
- Thursday, June 18 (4 p.m. – 8 p.m.) Blue Line Open House, Lee Elementary School, 3308 Hampton Rd (Route 20)
- Saturday, June 20 (10 a.m. – 1 p.m.) Blue Line Open House, Austin Community College Highland, 6101 Highland Campus Dr. (Routes 7, 337)

- **Proposed FY2020 Budget**

- Wednesday, August 28 (8 a.m. – 11 a.m.) Budget At-Station Outreach, Plaza Saltillo (Routes 17, 550)
- Thursday, August 29 (7 a.m. – 10 a.m.) Budget At-Stop Outreach, Norwood Walmart (Routes 10, 325)
- Friday, August 30 (7 a.m. – 10 a.m.) Budget At-Stop Outreach, Lakeline Park & Ride (Routes 550, 985)
- Friday, August 30 (7 a.m. – 10 a.m.) Budget Outreach Westgate Transit Center (Routes 300, 803)
- Wednesday, September 11 (12 p.m. – 1 p.m.)

2020

- **Project Connect**

- Monday, May 18 (5 p.m. – 7 p.m.) Project Connect Virtual Community Meeting
- Tuesday, May 19 (5 pm – 7 p.m.) Project Connect Virtual Community
- Wednesday, May 20 (5 p.m. – 6:30 p.m.) Project Connect Virtual Community Meeting
- Tuesday, May 26 (5 p.m. – 6:30 p.m.) Project Connect Virtual Community Meeting
- Thursday, May 28 (5 p.m. – 6:30 p.m.) Project Connect Virtual Community Meeting
- Friday, May 29 (3 p.m. – 4:30 p.m.) Project Connect Virtual Community Meeting
- Wednesday, July 22 (5 p.m. – 7 p.m.) Project Connect Virtual Community Meeting

- **Proposed FY2021 Budget**

- Wednesday, August 26 (4:30 pm) FY2021 Public Meeting, Virtual
- Wednesday, September 16 (12 p.m. – 1 p.m.) FY2021 Budget Hearing, Virtual

E. MEANINGFUL ACCESS TO PERSONS WITH LIMITED ENGLISH PROFICIENCY

This section details Capital Metro's Language Assistance Plan (LAP) to provide meaningful access to Capital Metro services and programs to Limited English Proficiency (LEP) individuals. Capital Metro recently updated its LAP and its implementation in the transit services due to the innovation in technology and changes in demographics. Capital Metro engaged a consultant to conduct a four-factor analysis and create a LAP. The highlights of this LAP are included in this Report. This LAP will be submitted to FTA along with this Report.

E-1. Language Assistance Plan and Four-Factor Analysis to address Limited English Proficiency

Introduction and Background

Capital Metro recently conducted a four-factor analysis and updated its LAP to address individuals with LEP as required by Title VI of the Civil Rights Act of 1964, Federal Executive Order 13166 and the Department of Transportation's LEP Guidelines. The LAP is a working plan that includes examples of LEP practices and procedures that are already implemented or recommended for future implementation at Capital Metro.

Capital Metro takes all reasonable steps to provide meaningful access to LEP individuals who use its services, facilities, programs, and attend meetings. The policy is to ensure that language will not prevent staff from communicating effectively with LEP clients and others to ensure safe and orderly operations, and that limited English proficiency will not prevent clients or any member of the public from accessing important programs and information; understanding rules, participating in proceedings; or gaining eligibility for programs and/or services.

The following document serves as the Title VI Language Assistance Plan (LAP) for Limited English Proficient (LEP) Populations for Capital Metro Transportation Authority (Capital Metro) and demonstrates the Agency's commitment to provide meaningful access to all individuals accessing service provided by the Agency. The plan is intended for managers and staff who interact directly or indirectly with LEP individuals. Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for Limited English Proficient people. As a sub-recipient of Federal funds, Capital Metro must "take reasonable steps to ensure meaningful access to their programs and activities by LEP persons."¹

On August 11, 2000, President William Jefferson Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" that requires Federal agencies and recipients of Federal funds to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those needed services so that LEP persons can have meaningful access to them. Further guidance was provided in 2012 with the release of the Federal Transit Administrations (FTA) circular FTA C 4702.1B that further codified the FTA's objective to "promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensure meaningful access to transit-related programs and activities by persons with limited English proficiency."²

¹ Federal Register Volume 70, Number 239 (Wednesday, December 14, 2005)

² FTA Circular 4702.1B- TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS, October 1, 2012.

As a means of ensuring this access, the FTA Office of Civil Rights has created a handbook³ for public transportation agencies that provides step-by-step instructions for conducting the required LEP needs assessment and developing a LAP. The LAP becomes a blueprint for ensuring that language does not present a barrier to access to the agency's programs and activities.

To develop the LAP necessary to comply with the guidance, an individualized agency assessment is required that balances the following four factors:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to encounter a program, activity, or service of the recipient or grantee;
- Factor 2: The frequency with which LEP individuals come in contact with the program;
- Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
- Factor 4: The resources available to the recipient and costs for translation services.

To ensure compliance with federal guidance, Capital Metro undertook an assessment with the goal that all reasonable efforts be made to ensure that customers are not denied access to their services due to a limited ability to speak, read, write or understand English. Capital Metro believes in the rights of all residents within its community, and furthermore supports the overriding goal of providing meaningful access to its services to LEP persons. Given the diverse nature of the service area, eliminating the barrier to persons with limited English-speaking ability will have a positive impact not only on LEP individuals themselves, but also on the impact that Capital Metro services have on the community.

Methodology and Recommendations

The development of the LAP and associated Four Factor Analysis included the following components:

1. Research of peer agencies.
2. Data analysis.
3. Surveys and Community Based Organization (CBO) participation.
4. Capital Metro staff interviews.
5. General plan findings that include the Four Factor Findings and Top Languages and Safe Harbor languages.

Based on the Four Factor Findings, the following are categories of recommendations that would improve the level of service that Capital Metro provides to its LEP customers and that can be implemented over time as budget and staff permits:

³ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers. The Federal Transit Administration Office of Civil Rights, April 13, 2007

1. General, including such things as internal awareness and public outreach strategy.
2. Materials and Documents.
3. Translation and Interpretation Tools and Protocols.
4. Employees, including training or incentives to empower employees to provide assistance.

Four Factor Analysis Overview

The cornerstone of the LAP is the Four Factor Analysis that serves as a needs assessment for developing language assistance measures for those with a limited ability to read, write, speak or understand English. These LEP populations are those who reported to the U.S. Census that they speak English “less than very well,” “not well,” or “not at all.” It’s important to note that LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information (trip planning needs, origin and destination needs) in English.

The FTA circular FTA C 4702.1B provides guidance to recipients on how to ensure that they provide meaningful access to persons who are LEP. The guidance notes that recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. The analysis can help Capital Metro determine if it communicates effectively with LEP persons and will inform the development of the LAP.

The Four Factor Analysis is an individualized agency assessment that balances the following four factors: 1) determining the number or proportion of LEP persons in the service area who may be served or are likely to encounter a Capital Metro program, activity or service; 2) the frequency with which LEP Populations come in contact with Capital Metro’s programs, activities and services; 3) the nature and importance of the program, activity, or service provided by the recipient to people’s lives; and 4) the resources available to Capital Metro and costs associated with language assistance services. This section describes the step-by-step instructions for conducting the required LEP needs assessment according to the FTA’s handbook as it applies to Capital Metro.

Data Sources and Use

A variety of data sources were consulted for each of the steps in the Four Factor Analysis. This section presents a description of each of the data sources and what they were used for in the analysis.

Data that were consulted to determine the most prevalent languages spoken in the service area, as well as those that may benefit from language assistance for the Factor 1 analysis included:

- American Community Survey (ACS) 2018 one-year sample languages of people that speak English less than “Very Well” for Travis County, Table B16001
- ACS 2015 five-year sample of languages of people that speak English less than “very well” for Williamson County, Table B16001
- ACS 2019 one-year sample of LEP Households, Table S1602

- Austin Independent School District English Language Learner Data (Bilingual and English as a Second Language Programs and Demographic Summary Report 2019-2020, Austin Independent School District)
- Capital Metro Customer Service Information

Because the service area includes both portions of Travis and Williamson County, the data includes different data years by county, as the most recent available data for Williamson County is from 2015. Each county is displayed independently so that the differences can be compared. Had 2018 data been available for both counties, a cumulative display could be presented. However, the data is separated for accuracy.

The data that were consulted for Factors 2 and 3 (the frequency with which LEP Populations come in contact with Capital Metro's programs activities and services, and the nature and importance of the program, activity, or service provided by Capital Metro to people's lives) included:

- Employee/contractor surveys
- Language Line telephone data
- On board surveys (if applicable, so may not be available)
- CBO consultation/survey data
- Employee/contractor interviews
- ACS 2019 one-year sample of commuting characteristics for Travis and Williamson counties, Table S0801

Data that were consulted for Factor 4 to determine the resources available to Capital Metro and costs associated with language assistance services included:

- Department budgets for translation and interpretation expenses
- Language Line telephone data costs
- Document translation services costs

1. Factor 1 Overview

Factor 1 includes determining the number or proportion of LEP persons in the service area who may be served or are likely to encounter a Capital Metro program, activity or service.

The first step in the LAP development process is to quantify the number of persons in the service area who do not speak English fluently and would benefit from language assistance. This process includes examining the agency's prior experience with LEP populations, and using census and other available data to identify concentrations of LEP persons in the service area, including those that qualify under the "Safe Harbor Languages" definition.

Safe Harbor languages are defined by the Circular as languages spoken by at least 1,000 individuals with LEP within the service area, stating, "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."

To determine Safe Harbor languages in the Capital Metro service area, the most recent available ACS data was used from Travis County and Williamson County as described above. While the data is not as contemporary as desired, it represents the most recent data available with the granularity necessary to review the specific languages for consideration.

The 2019-2020 Austin Independent School District's Language Learner data also provided corroborating data to support the findings.

1.1. Data Analysis

Linguistic Isolation

The first data reviewed related to the percentage of limited English-speaking households within the two counties in which no member 14 years or older (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and older have at least some difficulties with English. ⁴ Previous Census Bureau data products have referred to these households as "linguistically isolated."

About 6% of all Travis County households would be considered LEP households, while about 3% of Williamson County households would fall into that category (see **Table 3: Linguistic Isolation for Households in Travis and Williamson Counties**). Similar differences in the two counties reveal that of the total Spanish-speaking households in Travis County, about 20% of those are LEP households, or linguistically isolated. This compares to about 11% of the Williamson county Spanish-speaking households.

What is notable is that the percentage of households that speak Asian and Pacific Island languages and are LEP are also about 20% of the total in Travis County. However, in Williamson County, the percentage of Asian language speaking households is almost double that of Spanish speaking households at almost 19%.

⁴ ACS 2019 one-year sample Table S1602 Table Notes

Table 3. Linguistic Isolation for Households in Travis and Williamson Counties

	Travis County, Texas			Williamson County, Texas		
	Total Households	Limited English-speaking households	Percent limited English-speaking households	Total House holds	Limited English-speaking households	Percent limited English-speaking households
All households	472,361	28,409	6.00%	180,160	5,279	2.90%
Households speaking --						
Spanish	104,174	21,809	20.90%	28,132	3,007	10.70%
Other Indo-European languages	18,782	1,601	8.50%	7,885	677	8.60%
Asian and Pacific Island languages	19,541	3,923	20.10%	7,905	1,462	18.50%
Other languages	5,524	1,076	19.50%	1,285	133	10.40%

Source: ACS, 2019 one-year sample Table S1602.

While this data presents the broad language categories of those LEP households, it is necessary to review other census data tables to determine the languages of the LEP population. The most current ACS data was reviewed for this analysis, which includes Table B16001, that presents the population's ability to speak English.

ACS Safe Harbor Languages

The Safe Harbor language determination began with a review of the 2018 ACS one-year sample data, Table B16001 for Travis County and the 2015 ACS five-year sample data, and Table B16001 for Williamson County. As previously mentioned, it was necessary to consult two different sample years for the analysis, as the most current data for Williamson County was 2015. As a result, these two counties are presented independently, as shown in **Table 4: Travis County LEP Population (ACS 2018 1-Year Sample)** and **Table 5: Williamson County LEP Population (2015 ACS 5-Year Sample)** below. However, comparisons for languages that may have been under the 1,000 or the 5% threshold in one county were compared to the same language in the other county to see if the threshold could be reached. This data, below, is slightly different than the "Linguistic Isolation" table, above, as that data considers only those 14 years of age and older.

Seven unique Safe Harbor languages meeting the 1,000 or 5% threshold were identified using the 2018 and 2015 ACS data:

1. Spanish
2. Punjabi
3. Telegu
4. Chinese
5. Korean
6. Vietnamese
7. Arabic

English-only is still spoken by the majority of the population in the service area, with about 70% in Travis County and 80% in Williamson County. Spanish, by a large margin, continues to be the most prevalent LEP language in the service area, at 29% of the LEP population in Travis County and 24% of the LEP population in Williamson County. However, while Spanish is the most prevalent LEP population, this only accounts for about 9% of the entire population in Travis County and 5% in Williamson County.

Several other language groups also met the threshold but were in groups of languages rather than in discrete, unique languages. For example, over 1,100 residents indicated they spoke English less than “very well” in the Nepali, Marathi or other Indic languages (languages of India). However, that group includes greater than 10 common languages, including Hindi. As a result, while specific languages within the group are not included in the Safe Harbor list, there may be a need to investigate whether there are unmet needs within this or other of these language groups that may result in some languages being included for written translations. This will be further discussed in Factors 2 and 3.

One language, Punjabi, was included as a Safe Harbor language even though it did not meet the 1,000 or 5% threshold due to the close proximity to meeting this threshold. At 997 respondents who indicated they spoke English less than “very well,” it was included. Should new data be available in the next LAP update, it can be reviewed for relevance at that time.

Table 4. Travis County LEP Population (ACS 2018 1-Year Sample)

Travis County LEP Population			
Languages	Population	Percent of Total	Percent of LEP
Total:	1,170,348		
Speak only English	806,078	68.88%	
Spanish:	265,593		
Speak English "very well"	159,876		
Speak English less than "very well"	105,717	9.03%	29.02%
Punjabi:	1,164		
Speak English "very well"	167		
Speak English less than "very well"	997	0.09%	0.27%
Nepali, Marathi, or other Indic languages:	2,894		
Speak English "very well"	1,754		
Speak English less than "very well"	1,140	0.10%	0.31%
Other Indo-European languages:	2,209		
Speak English "very well"	1,076		
Speak English less than "very well"	1,133	0.10%	0.31%
Telugu:	4,602		
Speak English "very well"	3,433		
Speak English less than "very well"	1,169	0.10%	0.32%
Chinese (incl. Mandarin, Cantonese):	12,584		
Speak English "very well"	8,605		
Speak English less than "very well"	3,979	0.34%	1.09%
Korean:	3,422		
Speak English "very well"	1,863		
Speak English less than "very well"	1,559	0.13%	0.43%
Vietnamese:	9,956		
Speak English "very well"	5,080		
Speak English less than "very well"	4,876	0.42%	1.34%
Arabic:	7,782		
Speak English "very well"	5,504		
Arabic Speak English less than "very well"	2,278	0.19%	0.63%
Yoruba, Twi, Igbo, or other languages of Western Africa:	3,041		
Speak English "very well"	2,005		
Speak English less than "very well"	1,036	0.09%	0.28%
Swahili or other languages of Central, Eastern, and Southern Africa:	2,171		
Speak English "very well"	1,132		
Speak English less than "very well"	1,039	0.09%	0.29%

Source: ACS, 2018 one-year sample Table B16001.

Table 5. Williamson County LEP Population (2015 ACS 5-Year Sample)

Williamson County LEP Population			
Languages	Population	Percent of Total	Percent of LEP
Total:	440,120		
Speak only English	349,018	79.3%	
Spanish or Spanish Creole:	64,037		
Speak English "very well"	42,227		
Speak English less than "very well"	21,810	5.0%	23.9%
Chinese:	3,226		
Speak English "very well"	1,858		
Speak English less than "very well"	1,368	0.3%	1.5%
Korean:	1,398		
Speak English "very well"	626		
Speak English less than "very well"	772	0.2%	0.8%
Vietnamese:	2,411		
Speak English "very well"	1,203		
Speak English less than "very well"	1,208	0.3%	1.3%
Arabic:	577		
Speak English "very well"	414		
Speak English less than "very well"	163	0.0%	0.2%

Source: ACS, 2015 one-year sample Table B16001.

According to the guidelines set forth by the FTA, the LEP analysis should also review alternate and local sources of data to assist in Factor 1 findings. To provide further understanding of the languages that may require language assistance, the Austin Independent School District data on bilingual and English language learners was reviewed. The English Learner survey does not provide the most useful data for the LEP analysis, as it is collected among students and not the population as a whole. However, it provides another means of cross-checking census data analyses. As anticipated, Spanish remains the top language spoken by language-learners at 92% of the language learners. While this list does not present any unique observations, it does provide more clarity on several findings:

- 1) Mandarin is the Chinese language most spoken by language learners, which is not specified in the ACS data.
- 2) Several of the languages coincide with the ACS data and corroborate the findings, including Spanish, Arabic, Vietnamese, Korean, and Telugu.
- 3) Several other languages are not represented in the ACS data but may require further evaluation to determine if they should be considered languages requiring written translations, including Burmese, Pashto, Hindi, French or Tamil.

Table 6: Austin Independent School District Language Learner Data 2019 provides a breakdown of the primary languages of the Austin Independent School District English Learners reported for the school district.

Table 6. Austin Independent School District Language Learner Data 2019

2019 Austin Independent School District English Learner Data				
Number	Languages	Number of Learners	% of LEP	Rank
1	Spanish	19,876	92.3%	1
2	Arabic	415	1.9%	2
3	Vietnamese	296	1.4%	3
4	Pashto	217	1.0%	4
5	Mandarin	146	0.7%	5
6	Burmese	122	0.6%	6
7	Korean	121	0.6%	7
8	Telugu	102	0.5%	8
9	Hindi	89	0.4%	9
10	French	74	0.3%	10
11	Tamil	74	0.3%	11

Source: Bilingual and English as a Second Language Programs and Demographic Summary Report 2019-2020, Austin Independent School District

Using a compound analysis of the three data sources, we find that all of the most prevalent languages are represented in the data. Table 7: Composite of LEP Languages presents the ranking of the three data sets that were used to help identify the Safe Harbor languages. Based on Factors 2 and 3, additional languages may be added to reflect the service area's language needs.

Table 7. Composite of LEP Languages

Language	Travis County ACS Ranking	Williamson County ACS Ranking	AISD Learner Ranking
Spanish	1	1	1
Vietnamese	2	3	3
Chinese (Mandarin)	3	2	5
Arabic	4	5	2
Korean	5	4	7
Telugu	6	N/A	8
Pashto	N/A	N/A	4
Punjabi	7	N/A	N/A
Burmese	N/A	N/A	6
Hindi	N/A	N/A	9
French	N/A	N/A	10
Tamil	N/A	N/A	11

Sources: ACS, 2019 one-year sample Table S1602; Source: ACS, 2018 one-year sample Table B16001; and Bilingual and English as a Second Language Programs and Demographic Summary Report 2019-2020, Austin Independent School District.

Past Practice

In the past several years, the Community Advancement Network (CAN) in Austin has provided guidance to Capital Metro on ways to enhance their language assistance measures to refugee and immigrant populations in the area. CAN is a partnership of government, non-profit, private and faith-based organizations who work together to enhance the social, health, educational and economic well-being of Central Texas. CAN provides a collaborative forum to enhance awareness of issues, strengthen partnerships, connect efforts across issue areas, and facilitate development of collaborative strategies.

CAN alerted Capital Metro staff to the language assistance needs of several immigrant and refugee populations that have been underrepresented in census data, but whose language assistance needs may represent a barrier to using Capital Metro's service. The languages include French, which is used by a number of countries including Haiti and a variety of African counties; Burmese which is spoken in Myanmar; and Pashto, which is spoken in Afghanistan and parts of Pakistan. Capital Metro and other agencies in Central Texas have provided targeted translations to these languages.

As a result of this past practice, French, Burmese and Pashto will be added to the list of Safe Harbor languages.

1.2 Factor 1 Findings

As a result of the Factor 1 analysis, the following languages should be included in Capital Metro's LAP:

- Primary: Spanish represents the language spoken in the heaviest concentration within the service area.
- Safe Harbor languages:
 - i. Arabic,
 - ii. Burmese,
 - iii. Chinese (Mandarin),
 - iv. French,
 - v. Korean,
 - vi. Pashto,
 - vii. Punjabi,
 - viii. Telugu, and
 - ix. Vietnamese.

2. Factor 2 Overview

Factor 2 includes the frequency with which LEP Populations come in contact with Capital Metro's programs activities and services. This factor can also influence the languages that are included in the LAP, as some language groups may require language assistance even though they are not identified by data.

Assessing the frequency with which LEP populations come in contact with Capital Metro's programs, activities and service helps the agency determine which languages need to be considered for language services. Generally, "the more frequent the contact, the more likely enhanced language services will be needed."⁵ Strategies that help serve an LEP person on a one-time basis will be very different than those that may serve LEP persons on a daily basis. This analysis provides more clarity on the languages encountered and can help refine the languages requiring language assistance. This can also include adding languages for potential language assistance based on the agency employee's interaction with specific language populations.

For purposes of estimating the frequency of contact with LEP individuals, Capital Metro programs and services were reviewed, and front-line employees that have direct connection with LEP populations were surveyed and/or interviewed. Surveys and interviews with CBOs were also reviewed for relevance. Other data sources were also consulted including ACS data and the Capital Metro Origin and Destination Survey (2015).

⁵ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons--A Handbook for Public Transportation Providers, 2007

Capital Metro Services and Programs

Capital Metro provides a variety of services and programs that were reviewed to better understand the populations that Capital Metro may serve. In addition to bus and light rail transit service, the agency also offers a number of customer-service related programs that assist the community to access their services. This includes, trip-planning, providing information on how to purchase tickets or ride transit, ADA paratransit trip-scheduling, Pickup trip scheduling, lost and found, MetroBike scheduling, planning and marketing their services and general management of the system. **Table 8: Capital Metro Programs and Services** provides an overview of the broad categories of services that Capital Metro provides, along with the activities that may be relevant to LEP populations.

Table 8. Capital Metro Programs and Services

Program	Description of Relevant Activities
General Administration, Planning and Marketing Activities	Includes outreach to communities on new projects or programs, communication with community on important decision-making, safety and security of system, general administration and system management.
Fixed Route Bus and Rail Service	Bus and rail transit service to bus stops and stations within the service area.
Customer Service Activities	Trip Planning, wayfinding, information on fares, schedules and service disruptions, lost and found and other essential information.
MetroAccess	Service provision of demand-responsive ADA paratransit service. Trip scheduling of paratransit trips.
Pickup	App or Phone based general demand responsive service.
MetroRideShare	Vanpool subscription service for a group of 4 or more.
MetroBike	Bike rental and secure bike parking for bicycles.
Guaranteed Ride Home	Provides registered customers with taxi in event of an unexpected emergency.

Source: Capital Metro, 2021.

Capital Metro On-site Language Assistance Services

The majority of the agency-wide language assistance services are accomplished in one of two ways: Staff-derived translations or interpretations, or the telephone Language Line service.

Capital Metro contracts with Language Line phone service for interpretation assistance that can be used by Capital Metro employees that need interpreters for languages for which no Capital Metro staff is available to provide interpretations. Currently, there are multiple Capital Metro Customer Service and Marketing staff that speak Spanish, which can provide direct customer communication if they are available. There are no dedicated staff for this function, as staff fulfills

translations and interpretation as part of their general duties. When Capital Metro staff is assisting other calls or is not available, Language Line services provides interpretation.

Customer Service employees are trained on how to handle the Language Line transactions, which require that the customers be placed on hold, then added to a three-way call between the customer, the Customer Service staff and the language line interpreters. If the Customer Service staff can recognize the language, Spanish for example, the Customer Service employee can request that language from Language Line operators prior to adding the customer to the call. For languages that are not recognized, Language Line staff speak directly with the customer to identify the language.

Both fixed route and paratransit customer service staff use Language Line service. While 65% of ADA trips booked per day are handled by customer service, there are times when Language Line services are required; when Spanish-speaking staff are not available, or when staff does not speak the language requested. The ADA customer service database of riders includes a note related to languages, so even languages that are not common can be addressed in an effective and efficient manner. Spanish speaking customers can also book trips using the automated system. Paratransit eligibility is typically handled by service representatives. However, contractors can provide functional assessments and the contractors are required to have at least one Spanish speaker to address language access.

Marketing and Planning typically provide language assistance when conducting public meetings, including holding meetings in Spanish or having Spanish/English simultaneous interpretation. Many outreach campaigns also include Spanish translations for targeted materials for service changes along with information documents such as the Destinations Schedules Book and MetroAccess Rider Guide. Capital Planning also includes both meetings in Spanish, as well as translated outreach materials in other languages intended to help the community understand the contemplated capital projects and the public's role in decision-making. These efforts include advertising the meetings in foreign language newspapers and social media posts that can be translated within the app.

Information campaigns can also include videos aimed at improving the rider's understanding of the service or program that have been translated into Spanish. There are a number of embedded videos in Spanish on Capital Metro's website, in addition to videos on YouTube that provide Spanish subtitles to on a variety of subjects, including Project Connect, safety and other issues. There are also YouTube videos in English that provide Spanish subtitles on basic riding attributes (e.g., fare payment methods).

Spanish translations also are provided on Capital Metro bus stop signs and occur within the ticket vending machines so that Spanish speaking riders can purchase tickets in their preferred language. Real time information signs located at stops and stations also include Spanish translations, as do the automated announcements on-board vehicles and at stations. Currently the Pickup mobile application includes Spanish translation.

Capital Metro Website

While Capital Metro primarily operates fixed route bus and rail service, and federally required complementary paratransit service, it also offers a number of other services that may have unique translation needs that should be considered. As a result, a review of the web-based forms and informational materials posted on the Capital Metro website was undertaken to help establish which documents would need to have appropriate translations.

The Capital Metro website currently uses Google Translate for a variety of languages that have historically been requested. While not as accurate as a translator, Google Translate provides cost effective methods of addressing the immediate needs of LEP populations that speak lightly used languages. It can also be used as a method of translating text in a rough manner that can then be corrected by native speakers, thereby saving time on translations.

The website does have some translation issues that are being corrected. For example, some text or picture buttons that navigate to other areas of the website are in English and are incapable of being translated using Google Translate. Additionally, the Google Translate bar with translatable languages is at the bottom of the page, requiring users to scroll to the bottom to select the language. Moving the bar to the top and adding in the flag of the predominant country of the language will also help non-English speakers identify and use the translate function. Adding a text block in the mast head of the website that indicates the availability of free translation assistance along with the Customer Service telephone number that can connect to Language Line would provide an alternative to Google Translate and provide additional tools.

Additionally, some programs and some functions of the website have pdf fact sheets or participation guidelines that cannot be translated using the Google Translate function and would take multiple steps to translate with other third-party applications. One example is the “Report a Problem” and “Customer Contact Form”, which does not translate even after the user has selected a language. This is especially problematic, as customers may wish to report a Title VI complaint, but would be unable to unless they had additional assistance.

Another example is the MetroBike Shelter program, whose participation form does not translate using Google Transit. Similar issues exist with the Guaranteed Ride Home program in which pdfs related to how to register are not translated. As Capital Metro moves ahead with additional ground-breaking services, ensuring that all website applications and forms can be translated using Google Translate will help ensure that LEP populations have access to all of the Capital Metro services.

Frontline Staff Consultation

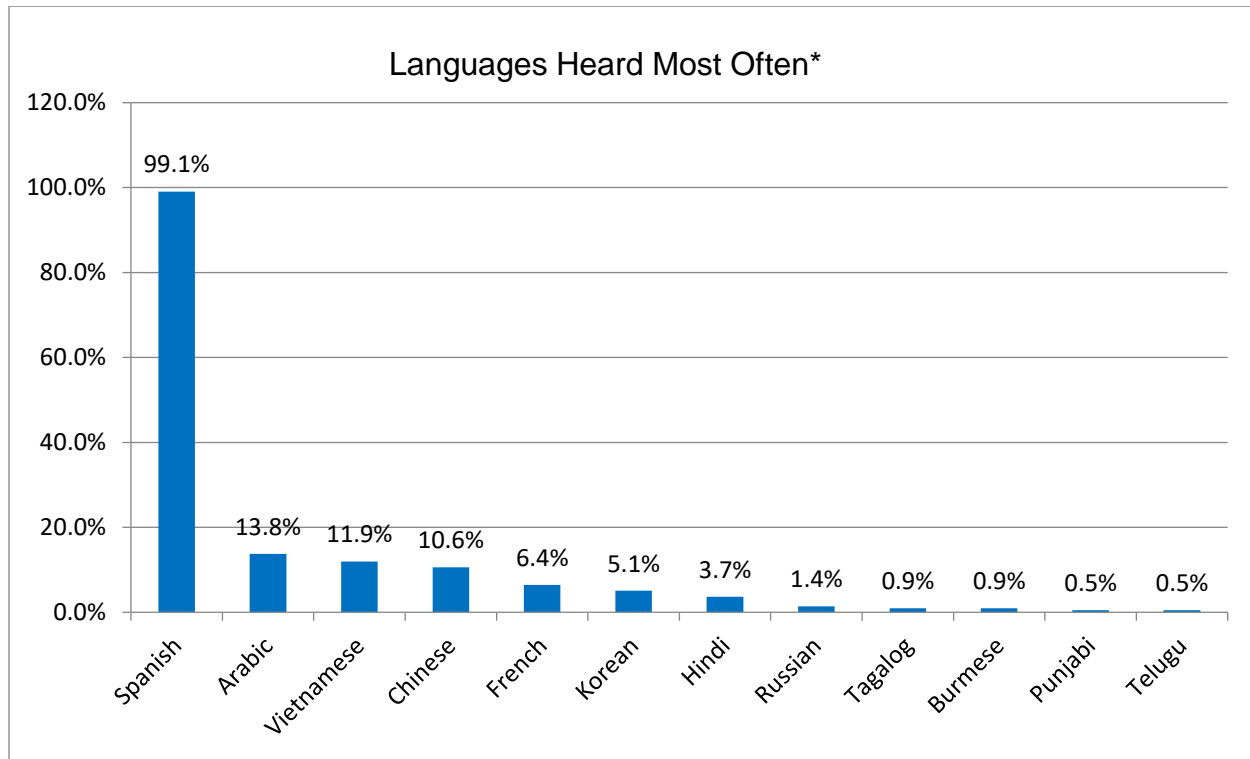
To better understand the languages that are most encountered by Capital Metro staff, both surveys and interviews were conducted. These surveys provided some broad understanding of the frequency of contact, while the interviews provided an in-depth look at the practices of those encountered and the language needs of the rider population and broader community. In addition

to asking questions about language interactions and requests, the survey asked questions on methods that could improve Capital Metro's outreach and communication to LEP communities.

The employee survey was posted online via SurveyMonkey.com to ensure that all employees would be able to participate. Capital Metro publicized and distributed the survey to Capital Metro staff, Austin Transit Partnership, contracted service providers and consultants. Capital Metro staff received the internal survey through an email and had verbal reminders during their team meetings. Contracted service providers received the internal survey via email, distributed via operator mailboxes, social media platforms, and via text. Promotional material was also available on the Timepoint TV which is a display of current bus operations located in the driver ready room.

Approximately 229 surveys were conducted, representing about 10% of the employees surveyed. However, the departments having the most direct communication with the public had much better response rates, including 100% for customer service and community engagement employees. Even bus and rail operators supplied responses and comments, which is often hard to achieve for "in the field" employees.

The survey results found that Spanish was the predominant language most often heard when interacting with the customers or members of the public. This corresponds to the ACS data and on-board survey data discussed in Factor 1. Other languages from Factor 1 are also heard in significant numbers, including Chinese, Vietnamese, Korean, Punjabi, Telugu, Arabic, Hindi, French and Burmese. **Figure 1: Languages Most Often Heard** provides the survey results for the languages heard most often by frontline customers.

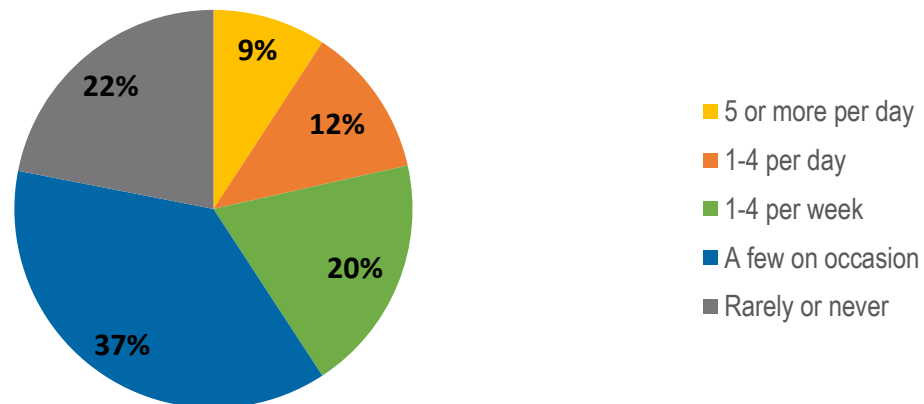
Figure 12. Languages Most Often Heard

Note: Does not add to 100%, as respondents could choose as many as applied.

Source: Language Assistance Plan Agency Survey Results, 2021.

About 21% of the survey respondents indicate that they encounter LEP customers fairly frequently (between 1-4 per day, and 5 or more per day). However, the survey results show that a significant percentage (59%) of respondents rarely or never encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in in English. About 20% indicate that they encounter LEP customers about 1-4 per week. **Figure 2: Frequency of LEP Customer Encounters** presents the frequency of contact with LEP customers.

Figure 2. Frequency of LEP Customer Encounters

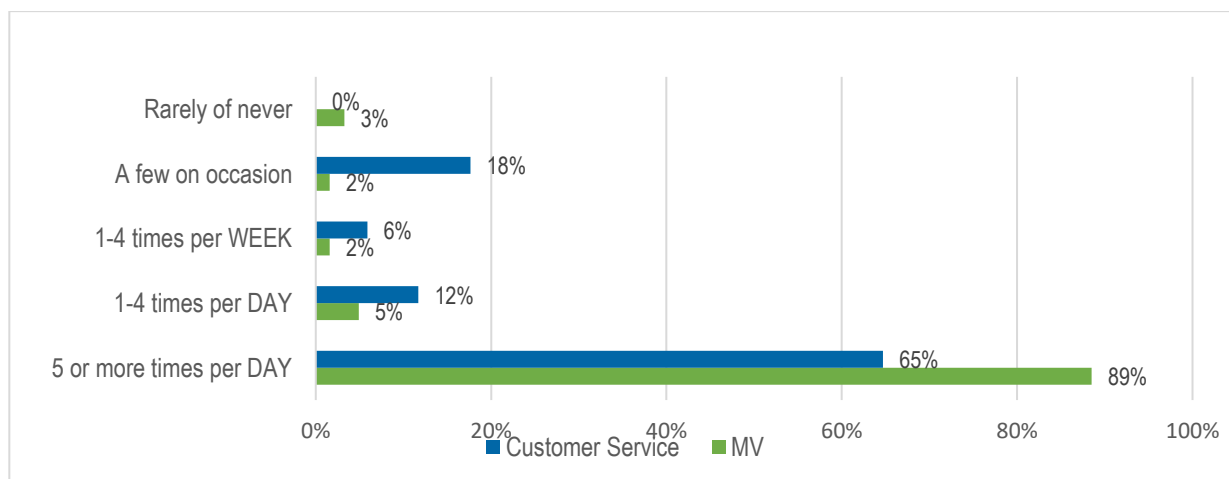


Source: Language Assistance Plan Agency Survey Results, 2021.

MV bus operators, Herzog rail operators, and Capital Metro Customer Service employees are the respondents who have the most public-facing interaction on a daily basis. To best serve the purpose of this survey, it was important to see if there was commonality in their experience. Only 3% of MV respondents Service staff indicated that they have little to no interaction with LEP individuals, while no Customer Service staff indicated that they have no LEP interactions.

89% of the MV respondents interact with customers and/or members of the public 5 or more times per day, compared to about 65% of the Customer Service staff. Respondents listed Spanish as the language most often heard by customers and/or members of the public, followed by Arabic, Chinese, and then Vietnamese. 5% of the MV respondents encounter LEP customers and/or members of the public 1-4 times per day, compared about 12% of Customer Service staff. **Figure 3: Customer Service Staff and MV Operators' Frequency of LEP Encounters**, presents the MV bus operators' and Customer Service representative's frequency of contact.

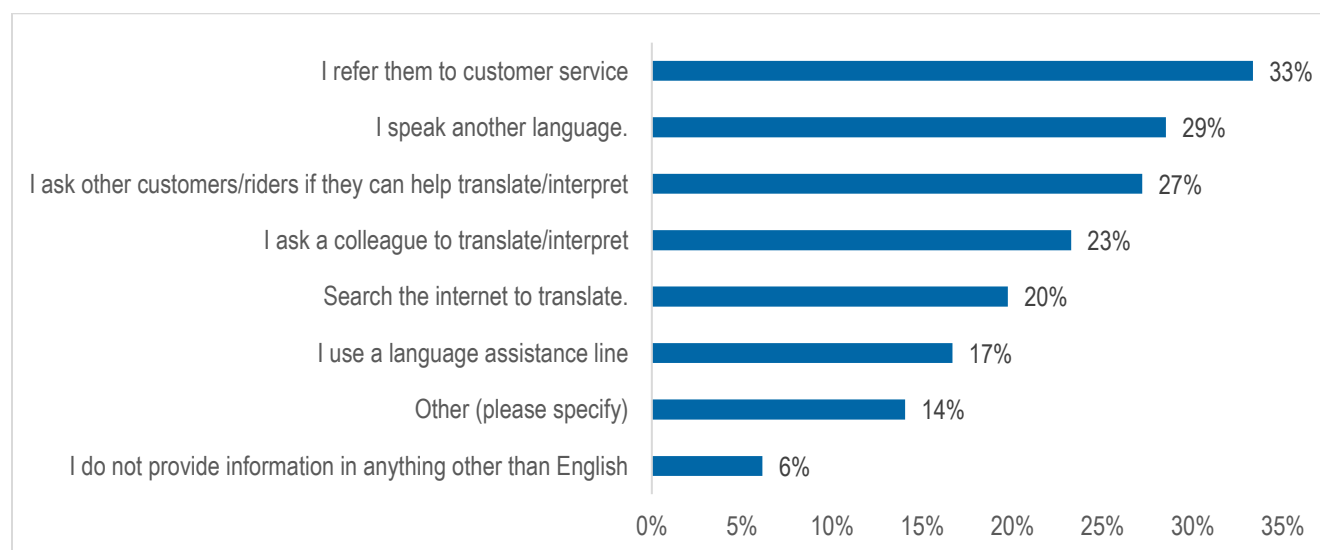
Figure 3. Customer Service Staff and MV Operators' Frequency of LEP Encounters



Source: Language Assistance Plan Agency Survey Results, 2021.

The employee survey also provided insight into how Capital Metro handles requests for language assistance which can help refine how Capital Metro can improve their language assistance measures. When asked about how they currently provide information to customers who do not communicate well in English, the vast majority of respondents indicate that they provide some level of direction so that customers can be helped. Only 6% indicated that they do not provide information in anything other than English, although these respondents could have also asked other riders for help or other methods to provide assistance. **Figure 4: Methods of Providing Information to LEP Customers** provides the survey responses for how employees provide information to LEP customers.

Figure 4. Methods of Providing Information to LEP Customers



Note: Does not add to 100%, as respondents could choose as many as applied.

Source: Language Assistance Plan Agency Survey Results, 2021.

Community Based Organization Consultation

Feedback from employees was not the only feedback obtained as Capital Metro sought to update its LAP. Via an online survey, over 30 CBOs maintained in Capital Metro's database were asked to speak for the communities they represent, and offer their insights about the needs of community members with LEP and how Capital Metro could better meet those needs.

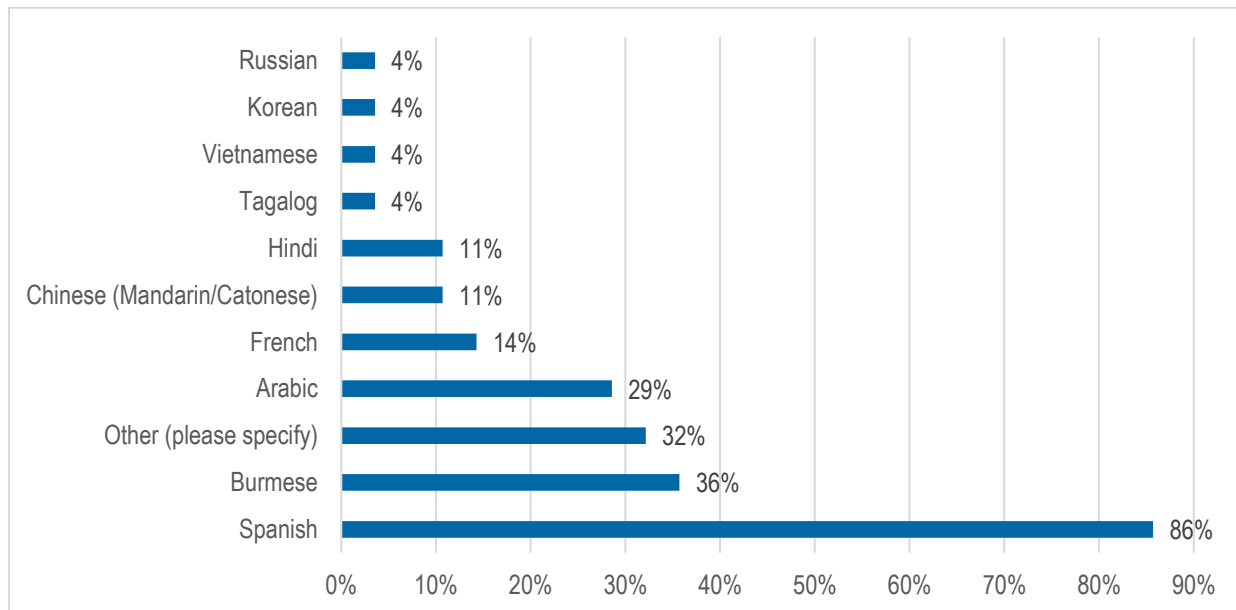
CBOs were also consulted so that Capital Metro could understand how their constituents both used Capital Metro services, the languages their constituents speak and what types of language assistance services would be useful. Due to COVID-19, it was not feasible to speak to LEP populations in person through focus groups or surveys. As a result, we relied on CBOs to represent their clients' needs.

The survey was designed to include people representing non-profit organizations, such as those providing social services, immigration or legal information as well as other governmental

agencies and educational and business organizations. In total, 28 representatives of 8 different CBOs completed the survey.

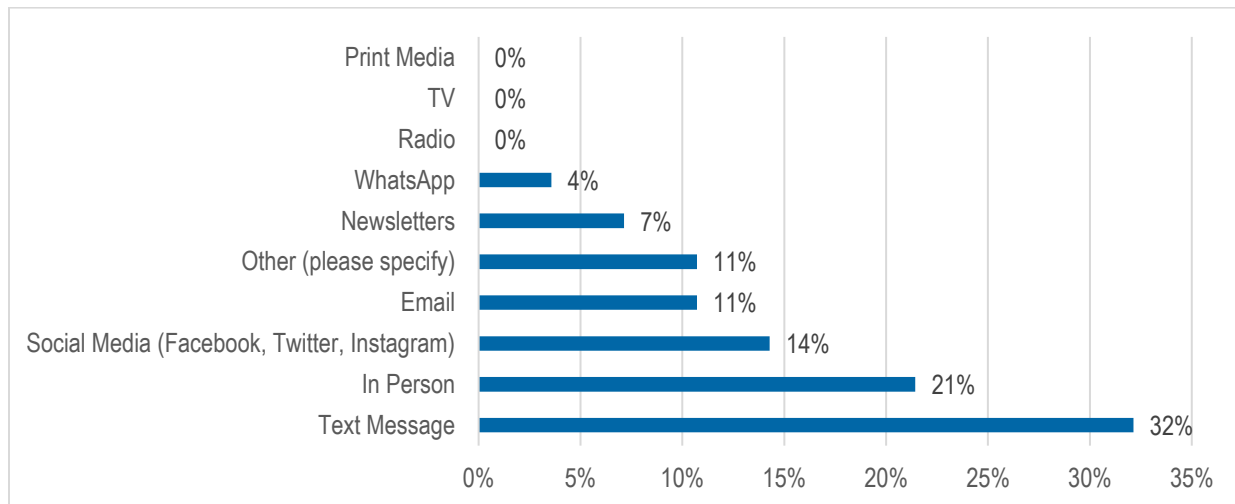
When asked which languages that the CBOs typically translate to provide information to their community, the overwhelming response was Spanish at 86%, followed by Burmese, Arabic, French, Chinese and Hindi. Other responses included Dari, Pashto, Swahili and Kinyarwanda. This corresponds with the Austin Independent School District English Learner data reviewed in Factor 1. **Figure 5: Translated Languages by CBOs** below, provides the full CBO responses.

Figure 5. Translated Languages by CBOs



Source: Community Based Organizations Survey Results, 2021.

The CBO survey also provided insight into how their clients wanted to receive communications. As anticipated, the most common response was “text message”, at 32%, followed by “In-person” at 21%. Those who responded “other” indicated that phone calls were preferred. Due to the popularity of online/electronic methods (social media, WhatsApp, text) the historical methods of communication that transit agencies have used (print, radio or TV) may not reach the LEP populations. **Figure 6: Preferred Method of Communication for LEP Clients** presents the preferred method of communication for LEP clients.

Figure 6. Preferred Method of Communication for LEP Clients

Source: Community Based Organizations Survey Results, 2021.

Language Line Data

Capital Metro reviewed Language Line call data for 2019 to 2020 to understand the languages that were requested within the last year and the frequency with which the service was used. Additional data will be reviewed in Factor 4, as the costs and resources to provide this service will be considered. The Language Line data includes general customer service calls, trip planning for fixed route bus and paratransit trip scheduling. **Table 9: Language Line Calls November 2019 to October 2020** presents the Language Line usage for November 2019 to October 2020. The monthly totals show, a decrease in calls beginning in March 2020 due to COVID-19, as people were sheltering in place. However, the languages reflected similar concentrations regardless of the reduced use.

As expected, Spanish remains the predominant language, followed by Swahili and Arabic; languages that were not identified in any unique concentration in the ACS data. Further follow up with the Paratransit department has revealed that the calls in Swahili relate to one customer who uses the Language Line services regularly to schedule their trip.

Five languages were not represented in any significant concentrations in any of the other data reviewed: Tagalog, Farsi, Kinyarwanda, Urdu and Portuguese. For these several customers, Language Line may be the most efficient way to provide language assistance.

Table 9. Language Line Calls November 2019 to October 2020

Language	Minutes	Calls	Avg Length of Call	% Total (Minutes)	Avg Interpreter Connect Time (Seconds)
Spanish	20,459	2,543	8.0	94.0%	79
Swahili	465	27	17.2	2.1%	267
Arabic	60	2	30.0	0.3%	8
Kinyarwanda	30	4	7.5	0.1%	18
Vietnamese	41	4	10.3	0.2%	6
Farsi	2	1	2.0	0.0%	2
Tagalog	42	3	14.0	0.2%	8
French	503	33	15.2	2.3%	56
Korean	2	1	2.0	0.0%	1
Urdu	48	2	24.0	0.2%	249
Mandarin	89	4	22.3	0.4%	61
Portuguese	22	2	11.0	0.1%	4
Total	21,763	2,626	8.3	100.0%	759

Source: Capital Metro: Language Line Services Inc. Invoices, November 2019 – October 2020.

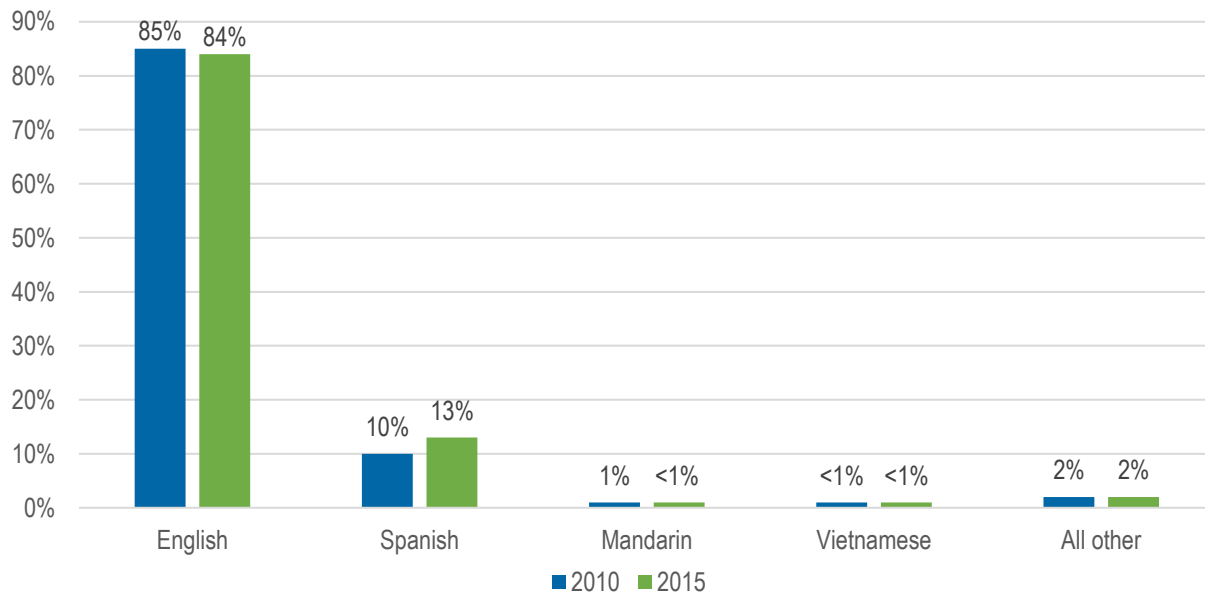
Origin and Destination Survey

The Origin Destination Survey conducted in 2015 provides a unique view of the ridership with regard to language and other characteristics that are useful to the Four Factor Analysis. Approximately 21,000 surveys were collected via intercept in the spring of 2015. The questionnaire was developed to determine riders' origins, destinations, fare payment and other information to develop models of travel patterns as well as profiles of the riders.

Question 19 of the survey asked riders to select the language they preferred to speak in the home. While not a surrogate for LEP status, it does provide a better understanding of the ridership of the system compared to the general countywide data contained in the ACS data.

Figure 7: Preferred Home Language 2010 and 2015 provides a comparison between 2010 and 2015 survey results, showing that approximately 13% of the rider population prefer to speak Spanish in the home, followed by about 1% of both Vietnamese and Mandarin. Spanish is up a few percentage points from 2015, which may signal that Spanish language needs may be growing.

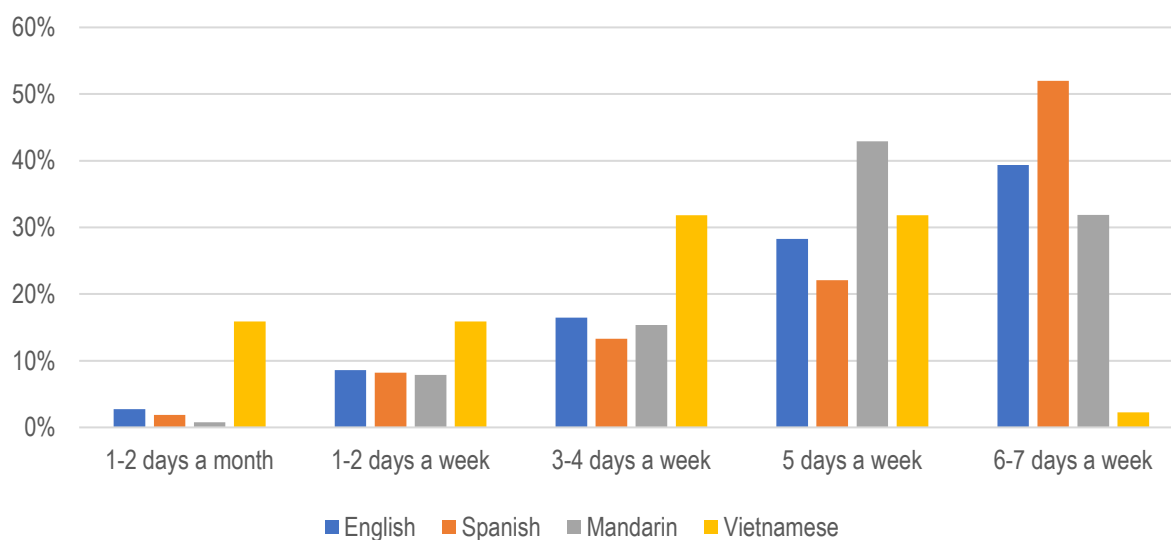
Figure 7. Preferred Home Language 2010 and 2015



Source: Capital Metro Origin and Destination Study Summary of Findings 2015; Creative Consumer Research

The Origin and Destination Survey also provided a snapshot of transit use among those who prefer to speak another language at home (see **Figure 8: Frequency of Transit Use by Preferred Language**). Question asked how often users rode the system. This response was cross tabulated with those who prefer to speak another language at home. While not a surrogate for LEP status, Spanish speakers are frequent transit users of the systems with more than 50% indicating that they use the system 6-7 days a week. Over 30% of Chinese speaking riders also indicate they use the system 6-7 days per week and 30% of the Vietnamese speaking population indicate they use the service at least 5 days a week. This helps provide a better understanding of the importance of the transit system, as well as how frequently staff may encounter LEP riders on board their vehicles.

Figure 8. Frequency of Transit Use by Preferred Language



Source: Capital Metro Origin and Destination Study Summary of Findings 2015; Creative Consumer Research

2.1. Factor 2 Findings

Contact with people who do not speak English very well was assessed through the Factor 2 analysis, which confirms that the LEP community frequently uses Capital Metro services, and that Capital Metro employees often cross paths with persons needing language assistance. About eight in ten of all employees who responded to the survey have some level of contact with the public. More than a third of them also encounter people who do not speak English very well on a daily basis.

Asked what people with LEP are typically seeking, employees most often point to schedule information (55%), connections (53%), routes/wayfinding (34%) and fares (33%). Almost 40% of employees report LEP persons were seeking information about service changes or detours, which comports with changes associated with COVID-19 service changes.

The languages encountered by Capital Metro employees and contractors mirror those identified in the Factor 1 analysis: 99% say Spanish is one of the top languages spoken by people who do not speak English very well. All other languages rank between 13% and 3%, with several lightly spoken languages reaching only 1%.

CBO outreach also helped assess contact between the LEP population and Capital Metro, with about 57% indicating that their LEP clients sought information from Capital Metro at least monthly. The CBO input also provided corroboration for the addition of several languages, including Burmese, French and Pashto.

3. Factor 3 Overview

Factor 3 includes the nature and importance of the program, activity, or service provided by the recipient to people's lives. "The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed... An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment."⁶

While not a surrogate for LEP status, Spanish speakers are frequent transit users of the systems with more than 50% indicating that they use the system 6-7 days a week according to the Origin and Destination survey described in Factor 2. Over 30% of Chinese (Mandarin) speaking riders also indicate they use the system 6-7 days per week. This helps provide a better understanding of the importance of the transit system, as well as how frequently staff may encounter LEP riders on board their vehicles.

Several data sources were consulted in the development of this task, including ACS data, employee survey data and CBO survey data.

Capital Metro Services

While Capital Metro's services are predominantly fixed route bus service, there are a number of other services that must be considered when developing the LAP to ensure that language assistance is not a barrier to participation. This includes a thorough understanding of the programs and activities that Capital Metro operates, which includes fixed route services, MetroAccess ADA paratransit, Pickup demand responsive services, Metrobike, Vanpool, and the Guaranteed Ride Home program.

ACS Data

To understand the importance of public transit to the general population, ACS data was reviewed for LEP worker populations as well as for all workers over the age of 16. While this does not fully address the role that Capital Metro's service play in overall mobility, it does present a snapshot of those commuters who rely on public transit within the two counties to access their jobs. As presented in the **Table 10: Travis and Williamson County Transit Use** below, approximately 13% of the LEP population in Travis County use public transportation to commute to work, compared to almost 3% of the general population.

⁶ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons--A Handbook for Public Transportation Providers, 2007

Table 10. Travis and Williamson County Transit Use

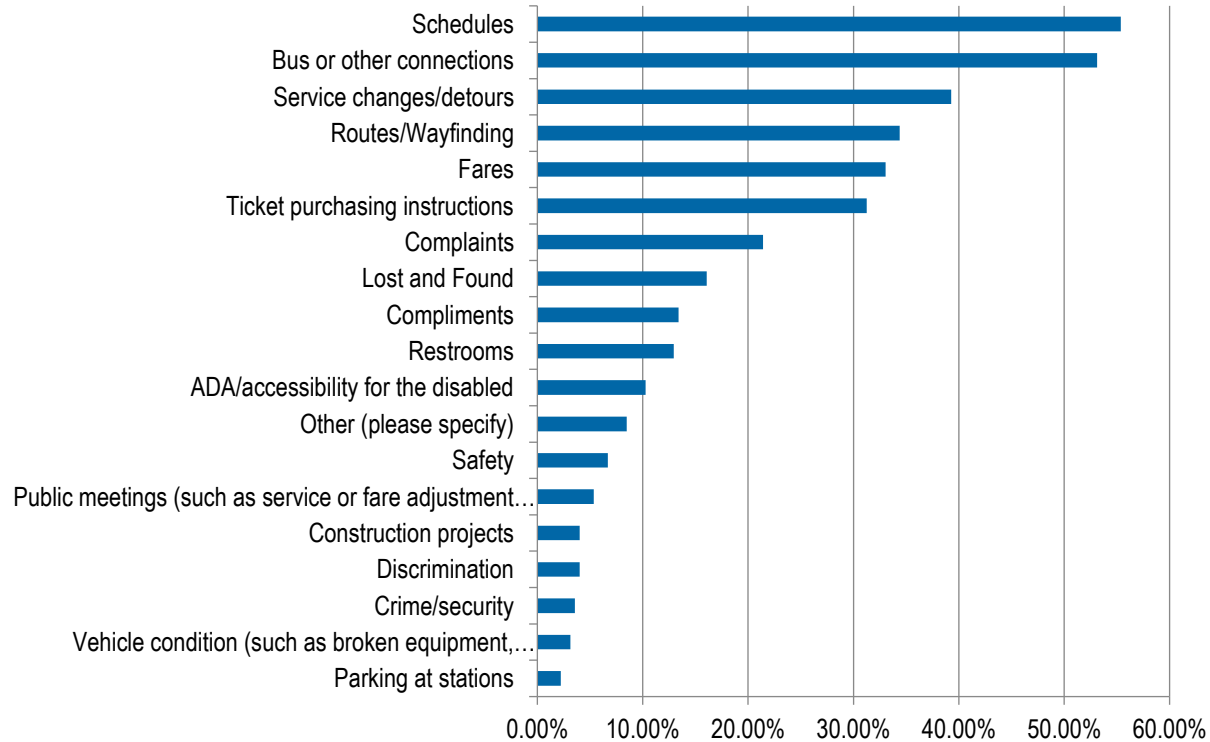
	Travis County Public Transit Use Percentage	Williamson County Public Transit Use Percentage
All Workers 16 years or over	2.6%	1.1%
Speak English Less Than Very Well	13.4%	0.0%

Source: ACS, 2019 one-year sample Table S0802

Employee Survey

Employees were asked what information was being sought by the LEP population which provides more clarity on how LEP riders may be interacting with the agency (see **Figure 9: Information Sought by LEP Customers**). Almost 60% of the respondents indicated that those who do not speak English very well are typically seeking information about schedules/routes/wayfinding followed by information on fares and ticket purchasing. This signals that customers calling into the service were actually using the services and were likely to need service-related language assistance.

Figure 9. Information Sought by LEP Customers

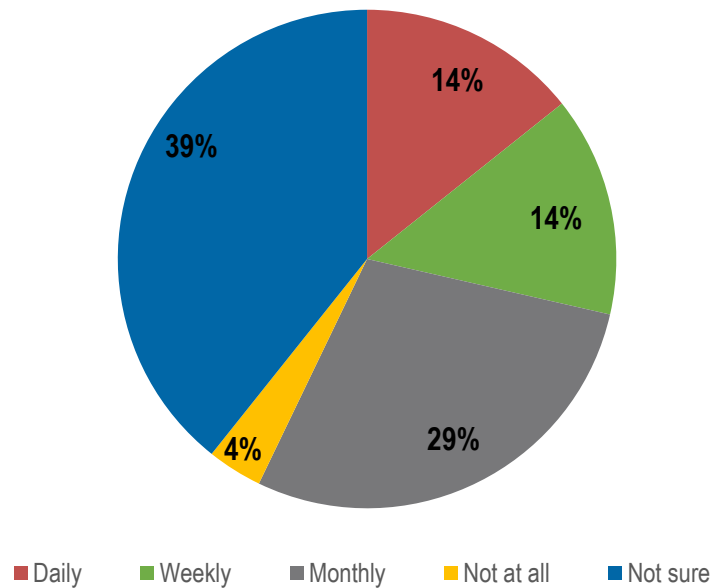


Source: Language Assistance Plan Agency Survey Results, 2021.

CBO Survey Results

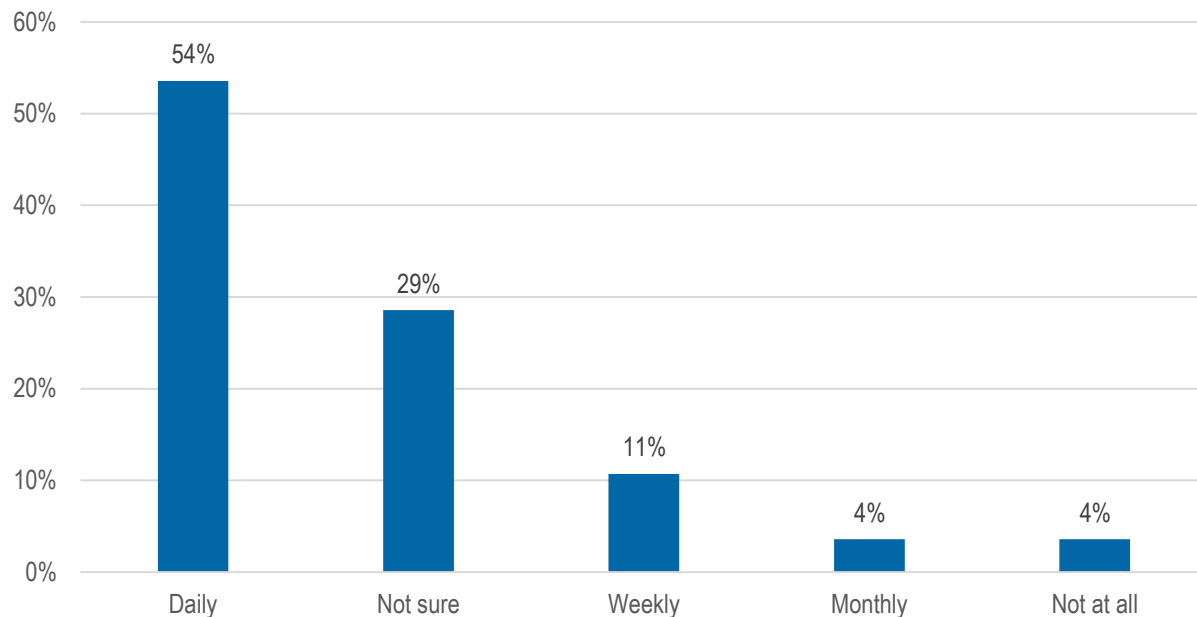
The CBOs also provided information about their clients use of the Capital Metro services that helps explain how important the services may be for them. Over 57% responded that their clients sought information about Capital Metro's services at least monthly, with 14% seeking information daily (see **Figure 10: Frequency of Seeking Information**).

Figure 10. Frequency of Seeking Information



Source: Community Based Organizations Survey Results, 2021.

Figure 11. Frequency of Use of Capital Metro Services.

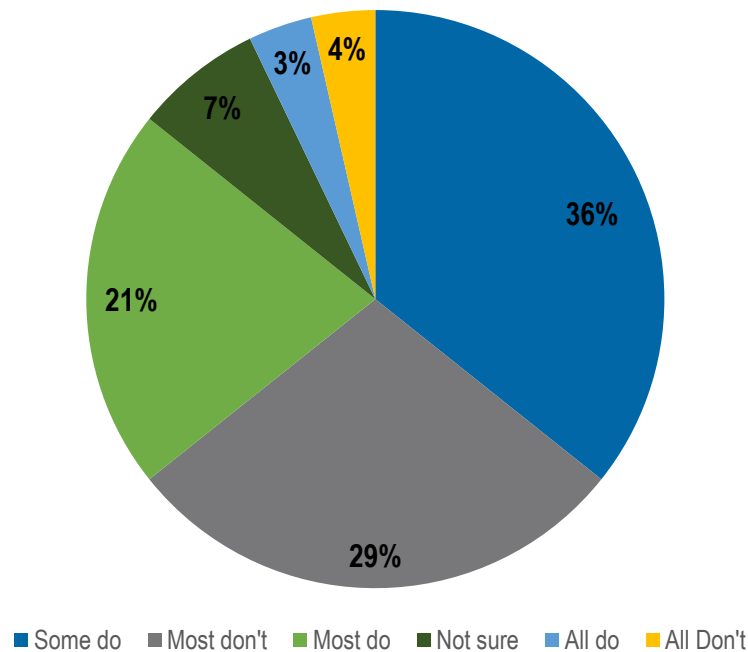


Source: Community Based Organizations Survey Results, 2021.

Even more crucial to our understanding of the LEP populations that the CBOs serve was how often their clients use Capital Metro service for general mobility (see **Figure 11: Frequency of Use of Capital Metro Services**). 54% indicate that their clients use the service daily, and 11% indicate at least monthly. This signals that Capital Metro services are important to the LEP community that they serve and may represent the primary means of mobility.

CBOs also provided insight on auto availability and how important transit services might be to their community presented in **Figure 12: Auto Availability of CBO Clients**. Over 30% indicate that autos are mostly or not at all available to their clients. This is contrasted with 57% indicating that most or some of their clients do have an auto available. This may mean that most indicate that their clients used Capital Metro services daily, they may also have used a car for the trip.

Figure 12. Auto Availability of CBO Clients



Source: Community Based Organizations Survey Results, 2021.

3.1 Factor 3 Findings

Transit service is arguably an important public service for many riders. However, to LEP populations, Capital Metro is a vital service that provides both commuting options as well as general mobility. When asked, 30% of the CBO respondents indicated that most of their clients do not have a car available for their use. As the research underscores, Capital Metro service is a vital means of transportation for those who do not speak English very well. Employees and CBO leaders agree there is a need to ensure Capital Metro is able to communicate with those who do not speak English very well and that the LEP community is able to successfully navigate using the system without knowing English.

Providing critical information in languages most commonly used by the LEP community ensures that LEP riders can access the services and programs that Capital Metro provides. Frequent connection with CBOs serving these populations, with LEP riders themselves, and with the agency's own employees will provide feedback on Capital Metro's success in continuing to ensure all have equal access to the services and programs that Capital Metro provides.

4. Factor 4 Summary

The final step in the four-factor analysis is designed to weigh the demand for language assistance against current and projected financial and personnel resources. The DOT Guidance says, “A recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, “reasonable steps” may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.”

Annual costs associated with the current measures to provide services and information in other languages for the last fiscal years are estimated below. Capital Metro does not have a specific line item to capture the budgeted costs and expenditures that can be easily tracked. Language assistance services are not specifically called out in departmental budgets, but rather are seen as a necessary effort within the greater department’s operation. This is the case in the audible announcement program, whose costs include translations and interpretations as requested for up to 5 languages in addition to English. Additionally, translations or interpreting associated with the functional assessments of disabled individuals that are seeking ADA paratransit eligibility undertaken by a contractor are also included in that contractor’s budget. As such, these amounts are not the absolute costs, as some language assistance expenses are either included in other contractors’ budgets or are included in line items such as “Other Services.”

Additionally, no cost estimates exist for the translation or interpretation assistance that are provided by existing staff who speak other languages and provide ad hoc translation or interpretation services such as the Customer Service representatives that provide Spanish interpretation on wayfinding, schedules and other customer requests. While Spanish translation or interpretation is not the Customer Service representatives’ only function in the agency, it does represent a significant portion of their job and should be considered in the overall effort that Capital Metro expends to provide language assistance. Further, the translation and interpretation costs below do not take into consideration language assistance measures provided through Capital Projects contractors, which are internalized with the total contract costs and may be independently funded through grants. The greatest expense to the agency currently is associated with the provision of interpretation services through the third-party contract with Language Line services, indicated below. **Table 11: Estimated Translation Costs** and **Table 12: Language Line Costs** below, highlights the magnitude of costs associated with Spanish language assistance services that were provided by the service in comparison to the other languages that are served.

Table 11. Estimated Translation Costs

Expenses	FY 2020
Total Agency Expenses	\$294,020,916.00
Language Line Services	\$12,687.00
Marketing/Communications	\$7,351.00
Customer Service	\$1,673.00
Civil Rights	\$5,000
Total	\$26,711.00
% for Translations	0.009%

Source: Capital Metro, 2021.

Table 12. Language Line Costs

Language	Charges
Spanish	\$11,866.22
Swahili	\$292.95
Arabic	\$37.80
Kinyarwanda	\$18.90
Vietnamese	\$25.83
Farsi	\$1.26
Tagalog	\$26.46
French	\$316.89
Korean	\$1.26
Urdu	\$30.24
Mandarin	\$56.07
Portuguese	\$13.86
Total	\$12,687.74

Source: Capital Metro: Language Line Services Inc. Invoices, November 2019 – October 2020.

4.1 Factor 4 Findings

Capital Metro understands that reducing barriers to services and benefits of Capital Metro to the extent resources are available will reap symbiotic benefits for the LEP populations as well as the agency. With more LEP individuals using Capital Metro, revenue may increase as well, likely making more funds available for increased language assistance programs. Capital Metro commits to devoting resources – monetary and staff time – to enhance LEP persons' use of the Capital Metro programs and services. Insofar as it is practical, ensuring that critical information is available in languages most commonly spoken within the Capital Metro service area is important to providing access to Capital Metro's services for LEP populations.

It may be impossible to determine the true costs of language assistance services as many costs are unaccounted for or are included in line items that are hard to separate. Additionally, staff who currently speak another language and provide ad hoc language assistance are not accounted for in the agency's total costs. However, while there are some costs that are included in other budgets within the agency's operation, the agency has a relatively small translation budget associated with language assistance to LEP populations.

Having a separate line item for language services within the agency would help quantify the costs associated with additional assistance outside of providing staff-related translations or interpretations. This way, costs can be tracked in the departments that have on-going expenses related to language services and planning for larger scale translation efforts could be more easily estimated, such as those associated with service or fare changes. Additionally, contracts that include outreach or scoping efforts should ensure that translation and interpretation costs are budgeted and tracked through the life of the contract. This can be especially useful, as grant funds used for capital projects can help offset agency language assistance costs, particularly if grant funding is anticipated for projects included in the Project Connect Vision Plan.

5. Four Factor Findings and Strategies

The Four-Factor analysis provides clear support for Capital Metro's approach to universal access to its services and system regardless of English language proficiency and language spoken. Among the highlights of this analysis are:

- **Factor One:** Over 15% of the population in the service area do not speak English very well and are considered to have Limited English Proficiency. One language—Spanish—remains the predominant LEP language in both counties, amounting to 9% of the population in Transit County and 5% in Williamson County. 10 languages are included as Safe Harbor languages including languages that were added for translations due to community and staff input. The languages are: Spanish, Arabic, Burmese, Chinese (Mandarin), French, Korean, Pashto, Punjabi, Telugu and Vietnamese.
- **Factor Two:** The LEP community frequently accesses Capital Metro services and information, and Capital Metro employees often cross paths with persons needing language assistance. About 20% of all surveyed employees encounter people who do not speak English very well on a daily basis, while almost 90% of MV bus operators and Customer Service staff regularly encounter LEP populations. Additionally, almost 60% of the CBOs responded that their clients frequently sought information for Capital Metro about their services and programs.
- **Factor Three:** Capital Metro's services are important to the LEP community. The LEP population either regularly uses Capital Metro, or uses it at least sometimes, according to the CBOs. Census data also shows that LEP populations use transit about 5 times more than non-LEP populations in Travis County. CBOs also indicated that about 1/3 of their

LEP clients do not have a car available for their trip and must rely on Capital Metro for their general mobility.

- **Factor Four:** The analysis shows that Capital Metro plans for the myriad activities that they currently undertake to ensure that people who do not speak English very well are able to access the system as easily as the general population. While Capital Metro only spends a little of the operating budget on language assistance services, this does not include the hidden costs associated with staff providing on-site and ad hoc translation and interpretation services. Recommended changes will help Capital Metro plan into the future to monitor and budget their activities to ensure they are cost effective and help those with the greatest need.

5. Language Assistance Plan Overview

The Department of Transportation (DOT) LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

This plan represents a continuing approach to providing language assistance. While some language assistance measures are in place, other methods of providing language assistance are being implemented over time to ensure continued compliance with federal requirements. This plan also includes recommendations that would assist Capital Metro to reach best industry standards for providing language assistance for those needing to access Capital Metro programs and services.

5.1 Identifying LEP Individuals Who Need Language Assistance

The Four Factor analysis considered a number of data sets to determine the languages that would require “Safe Harbor” consideration, in addition to languages predominantly used by Capital Metro riders. These data included Census data (American Community Survey 5-year sample 2015 for Williamson County and 1-year sample for Travis County), the Austin Independent School District English Learners data 2019 and the Capital Metro 2015 Origin and Destination Survey. A little over 10% of the population in Travis County and 5% of the population in Williamson County speak English less than “Very Well” and would be considered the LEP population.

Based on the Four Factor analyses, the most frequently encountered languages broken into two groups:

- Primary: Spanish represents the language spoken in the heaviest concentration within the service area
- Safe Harbor and additional languages: Arabic, Burmese, Chinese (Mandarin), French, Korean, Pashto, Punjabi, Telugu and Vietnamese.

5.2 Providing Language Assistance Measures

Capital Metro is committed to providing meaningful access to information and services to its LEP customers. Capital Metro uses various methods to accomplish this goal. Along with enabling persons who do not speak English very well to navigate the system with the same ease as the general population, it is necessary to provide a meaningful opportunity for LEP persons to participate in the public comment process for planning activities and major capital projects. Specific methods pertaining to outreach will be discussed in Capital Metro's Public Participation Plan.

Currently, the Capital Metro primary language tools include the following:

- Providing Notice to Beneficiaries and Title VI complaint procedures and forms in all Safe Harbor Languages.
- Providing Google Translate on the Capital Metro website, allowing translations for most content.
- Providing bilingual customer service and marketing staff to provide on-site Spanish speaking translations and interpreting in a variety of settings.
- Making Language Line services available for any staff, including Customer Service staff, to address language assistance needs for any language.
- Holding public meetings in Spanish or with simultaneous English/Spanish translations.
- Offering interpreters by request for public meetings, public hearings or board meetings.
- Posting public meeting notices in foreign language newspapers to reach LEP populations.
- Providing Spanish translations and pictograms on board vehicles, on Ticket Vending Machines, at bus stops and at stations.
- Producing Spanish language video content.
- Creating Spanish translations for some informational brochures and marketing materials.
- Tapping into CBO assistance in outreach to LEP populations and language assistance.

The following are recommendations that would improve the level of service that Capital Metro provides to its LEP customers and that can be implemented over time as budget and staff permits. These recommendations are organized into four categories:

1. General, including such things as internal awareness and public outreach strategy.
2. Materials and documents.
3. Translation and interpretation tools and protocols.

4. Employees, including training or incentives to empower employees to provide assistance.

General Title VI and LEP Awareness

Title VI and LEP awareness are the cornerstone of the entire Title VI program and can further understanding within the agency. A number of recommendations may help to improve the practice:

- ***Title VI Awareness Training:*** integrate Title VI awareness into all activities of the agency
- ***Public Engagement Needs and strategies:*** draft a handbook with protocols and procedures for all departments that interact with the public including incorporating language assistance measures; consider designating a “Language Access Coordinator” to act as point person for implementation and monitoring of language assistance needs.
- ***Project Charter:*** develop a protocol to ensure that Title VI and/or LAP issues are acknowledged and addressed by each department’s project manager, including a form outlining the LEP strategy that is submitted to the Title VI office for approval.
- ***Demographic analysis of new project areas:*** consider the attributes of the new projects’ geography.
- ***Eliminating English-only informational campaigns:*** include “Free Language Assistance” text box at a minimum to ensure participation of LEP populations.
- ***Develop or enhance relationships with Community Based Organization:*** continue to expand the CBO database and engage CBOs to improve communication methods.
- ***Contract compliance:*** ensure that contract terms includes requirements for contractors to provide public information that complies with Title VI LEP guidelines.

Materials and Documents

- ***Title VI Public Notice, Complaint Form and Procedures*** (Vital Document): notice should be in all Safe Harbor languages on the website and posted on-board vehicles, in the Board room, at the General Office lobby, Transit Store, stations, or other public areas.
- ***Notice of Free Language Assistance*** (Vital Document): notice of free language assistance should be located on the mast head of Capital Metro’s website and included in all printed and digital materials; this should also be posted with the Title VI information in the Board room, at the General Office lobby, Transit Store, stations, on-board vehicles or any location where riders may congregate.
- ***Legal Notices*** (Vital Document); translations of legal documents should be translated upon request.
- ***Registration Forms*** (Vital Document): make sure that all registration forms on the website can be translated using online tools (Google Translate or others) and for printed materials, forms should be translated into Spanish with “Free Language Assistance” printed at the bottom of all forms for other Safe Harbor languages.
- ***Fare and Service Change Information*** (Vital Document): translate into Spanish with “Free Language Assistance” text box printed on all documents.

- **Safety and Security Information:** use pictographs as much as practicable.
- **TVMs, fareboxes, bus stops and onboard equipment:** translate into Spanish as needed and use pictographs onboard vehicles when applicable. Translate bus/train/station announcements into Spanish and other languages as budget permits.
- **General Promotional Materials:** Translate into Spanish as budget permits or as required by issue. Print “Free Language Assistance” on all promotional materials.
- **Construction, Detour, Stop Move, and Other Courtesy Notices:** translate into Spanish when feasible, and other languages as determined by analysis of location.
- **Website Materials:** make sure that all content (including navigation buttons) is in a form that can be translated using online tools; upload documents in original form and not scanned so documents can be translated. Use pictograms as necessary instead of printed text.
- **Rider Guides and Materials:** develop rider guides or other materials in Spanish and other languages as funding permits; incorporate illustration and pictograms as feasible; produce how to ride videos with translations, create “how to ride” curriculum for ESL schools in the area.

Translation Tools and Protocols

- **Language Line Service:** promote the use of service via “Free Language Assistance” text block that lists the Customer Service telephone number that can connect to Language Line services, including on the website, in all printed and digital material; investigate options to improve language recognition on phone tree when engaging calls.
- **Line Item for Translation and Interpretation:** use budget codes to monitor and plan for translation and interpretation expenses, including grant-funded capital projects that can be used to help fund necessary language assistance.
- **Public Hearing Protocol:** provide Spanish interpreter for all public hearings and offer other Safe Harbor interpreters with advanced notice.
- **Board Meeting Protocol:** provide requested interpreters with a 72-hour notice for all Safe Harbor languages.
- **Community Meetings Protocol:** provide Spanish interpreters for at least one meeting within the outreach subject matter (such as service changes or major project outreach); offer interpretation or translation of materials in advance of the meetings.
- **Simultaneous Interpretation Equipment:** consider simultaneous interpretation equipment to offer greater flexibility for language translation.
- **Language Identification Cards:** create and distribute language identification cards to all employees (and in operators’ pouches) with Language Line phone and account numbers included for remote or emergency situations. Consider adding QR code that directs employees to Language Line.
- **Language Manual:** create language manual that includes common phrases used by riders in other languages that can be phonetically spelled out.

- **Digital Tools or Language Technology:** help employees take initiative to use new technology to provide language assistance for users; provide training on new apps and technology.
- **Mobile Apps:** ensure that new Capital Metro sponsored apps allow for interpretation and translations into Safe Harbor languages; ensure that existing apps such as required for Pickup can accommodate additional languages beyond the current Spanish translations.
- **Website Administration and Management:** move Google Translate to the top of the webpage and add all languages to the Google Translate function; Add “Free Language Assistance” in all Safe Harbor languages with the Customer Service telephone number that connects to Language Line or consider creating a Language Assistance page that can provide translated materials along with the Customer Service telephone to obtain translated materials or interpretation services; Remove pictures with text that cannot be translated; Add Google Analytics to determine how LEP users interact with the website.

Employees

- **New Employees** (and contractors): Include ability to speak another language as a desired qualification in hiring.
- **Bilingual Employees:** Identify jobs where bilingual ability is required or desired; Investigate the ability to pay a shift differential for employees who speak another language and whose job requires customer contact.
- **Employee and Contractor Training:** hold Title VI and LEP training for all new hires (both agency and contractors), including operator refresher training; conduct training for planning and marketing staff to integrate consideration of Title VI protected populations (including LEP) into planning.
- **Training for Title VI-Related Complaints for Employees and Contractors:** Expand diversity training for operators on the need to accommodate LEP populations to avoid Title VI related complaints.
- **Language Identification Cards:** Distribute language identification cards to operators or other employees; Consider adding QR code that directs staff users to Language Line.
- **Employee Tuition Assistance:** Promote the availability of tuition-reimbursement for all applicable employees who take a course to learn the primary languages in the Capital Metro service area.
- **Employee Shift Differential:** Consider offering monetary shift differential for positions that require frontline contact with LEP populations for those who speak a Safe Harbor language fluently.

Training Staff

Training staff on the protocols to provide language assistance and Title VI in general helps to ensure that employees understand the guidance and consider the needs of LEP individuals in the course of doing their job. Currently, only transit operators receive general Title VI training, which does not specifically describe how drivers are to provide language assistance if requested. Customer service staff are instructed on how to use the Language Line service but not on more general Title VI requirements and general language assistance measures. Other employees are not given formal Title VI training, nor are they given specific LEP training to help them understand the agency's role in language assistance.

It is recommended that both general Title VI training and specific LAP training occur within the following framework:

- ***New Employee Orientation (Title VI):*** all new employees should be provided an overview of the agency's Title VI responsibilities, including general information about language assistance measures that the agency provides.
- ***LEP Training:*** All frontline employees (and contractors) should attend LEP related training, with specific emphasis on elements under their job description at least upon orientation. Frontline employee classifications will be selected based on their likelihood of coming in contact with the public or being in departments that have broad community engagement activities. This will likely include Customer Service staff, bus and rail operators, Marketing and Communication staff, ADA paratransit staff and contractors, Planning and Capital Projects; however, there may be other positions that would qualify and should undertake the training. The training should be targeted to help the employees understand how to provide the language assistance measures that Capital Metro offers. This could include new tools, existing or new technology that is available, or methods to provide language assistance to ensure competency. This should also be job-specific so that participants will come away from the training with real world understanding of how to provide language assistance given Capital Metro's tools.
- ***Refresher Training (Title VI):*** Transit operators should attend Title VI training with an additional emphasis on providing language assistance as part of their normal refresher training series to address any questions that they may have regarding either encounters with LEP populations or how to provide language assistance. Training on technology or tools that are available to operators should be included.

Training can be accomplished using methods such as video learning, PowerPoint presentations, or small group learning so that the task associated with staff training does not become onerous to the agency. Videos on the subject can be produced in a cost-effective way that can be used in new employee orientation, contractor training or refresher training. This would be especially helpful when demonstrating new technology that may be available for language assistance.

5.3 Providing Notice to LEP Persons of Language Assistance Measures

As the most far reaching and important aspect of language assistance, providing notice to the public on the available language assistance is crucial. Consequently, ensuring that informing the public of how to seek language assistance plays a substantial role in the LAP. Web-based information has taken center stage in the last year, with most documentation about service disruptions, COVID protocols or other crucial information. As a result, changes to the website are being undertaken to ensure that notices of free language assistance can be front and center in the users' Capital Metro website experience. To ensure that notification of language assistance is undertaken with a comprehensive view, there are number of recommendations that are being made to improve this practice.

One easy and effective method to provide notification of language assistance measures is to produce a text box that includes all the Safe Harbor languages, the phrase "Free Language Assistance", and the customer service number that can be connected to Language Line. The text box can then be used on all printed materials and in the digital realm such as the example, below.

Free language assistance | Asistencia gratis en su idioma | Libreng tulong para sa wika | 免費語言幫助
Hỗ trợ giúp thông dịch miễn phí | 무료 언어 지원 | शुल्क भाषा समर्थन | бесплатная языковая помощь

The establishment of vital documents also helps Capital Metro communicate the language assistance measures and translations that should occur given the importance of the documents. **Table 13: Vital Documents Guidance** lists both vital and non-vital documents, categories of documents, and identifies the language category into which they should be translated. As has happened in the past, Capital Metro may provide a summary of a vital document and/or notice of free language assistance for the "Safe Harbor" languages, rather than a word-for-word translation of each of the vital documents.

Capital Metro should not limit itself to these guidelines, intending to translate documents into more languages as circumstances dictate and resources allow. As necessary, Capital Metro may also rely on pictographs to communicate information regardless of language spoken.

Table 13. Vital Documents Guidance

Document	Languages	Vital Document?
Title VI Public Notice	All Safe Harbor Languages	Yes
Title VI Complaint Form and Procedures	All Safe Harbor Languages	Yes
Notice of Free Language Assistance	All Safe Harbor Languages	Yes
General Promotional Materials (such as FAQs or other materials that provide direction on how to access services and public meeting notices)	Spanish and Safe Harbor Languages as funding permits	Depends on content
Public Meeting and Hearing Notices	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
“Participation” or “Intake” forms (such as Americans with Disabilities Act (ADA) Determination letter and appeal forms, and incentive forms)	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
Ridership and/or Customer Satisfaction Surveys	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
Legal Notices, construction notices, or environmental findings notices	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Depends on content

Source: Capital Metro, 2021.

6. Monitoring and Updating the Plan

Monitoring the LAP is an important element of keeping the plan not only up to date but relevant to the population being served. New immigrant populations with languages that were not originally identified may require additional consideration in the LAP.

Additionally, new technology changes our understanding of the best methods to use in establishing a comprehensive approach to language assistance. For example, smart phones were not as prevalent in prior years, and translation applications were not as commonplace. Social

media applications like Facebook Live, YouTube live are more recent advancements to public engagement that have changed the landscape of communication. We have also seen LEP populations move away from receiving information in more historically standard formats (print, radio, TV) and opt for more text-based communications. All of these changes would not have been considered without a comprehensive review of the plan.

While a review of the LAP every three years to coincide with the Title VI update is standard, it is also important to monitor the language assistance measures periodically, along with how well the outreach activities are engaging LEP populations, so that if mid-course corrections are needed, they can be accomplished within the framework of the overall LAP. Keeping track of subtle changes in how LEP populations are engaging in outreach activities may also help understand new methods of assistance.

An annual review of the LAP would ensure that methods of outreach and communication consider small and large changes associated with the languages being requested for language assistance or to address changes in the most effective means of communicating.

This includes providing an opportunity for staff to provide feedback on the plan and the language assistance measures that may not be as effective. Informal “brown bag” sessions can provide an inviting forum that may encourage staff to become LEP experts and problem solvers for this serious concern. Community members may also play a role in the continual monitoring of the language assistance measures, as the broader community can often understand the issue in ways that the agency may not.

Informal focus groups can also be employed to help identify what language skills employees might have, how they might be able to employ them, and what activities they might best enjoy or be good at. These focus groups could include the general staff as well as job-specific as a way to further the LAP practice without significant cost.

Additionally, while the LAP provides guidance for how to approach LEP considerations in establishing new outreach campaigns, staff needs to be responsive to the community’s needs in providing language assistance. This may include a targeted outreach approach that reviews demographic changes in the area to anticipate language assistance needs.

F. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Capital Metro has two committees that consist of non-elected members of the public. These are the Customer Satisfaction Advisory Committee (CSAC) and the Access Advisory Committee (AAC). Functions of these two committees are provided later in this section. Within the Title VI Circular, FTA requires that Capital Metro include a table (**See Table 14. Membership of Capital Metro's Advisory Committees Broken Down by Race/Ethnicity**) depicting the racial break-down of the members of all of its non-elected committees and advisory councils who were appointed to their current position by the Capital Metro Board. It must also include a description of the process the agency uses to encourage participation of minorities on such committees. These requirements apply to the AAC and CSAC committees because all the positions on these committees are appointed by Capital Metro Board members.

Both of these committees have a structure, duties, and responsibilities as may be determined by the Board. The Board may from time to time establish other advisory committees/taskforces that may include citizen members. The Board believes that although no one approach guarantees successful involvement, effectiveness in communication and building community trust stems from careful planning and attention to creating a balance between the needs of Capital Metro and the needs of the community.

Table 14. Membership of Capital Metro's Advisory Committees Broken Down by Race/Ethnicity

Body	Caucasian	Hispanic	African American	Asian American	Others
Capital Metro's Service Area Population	74%	33%	8%	7%	11%
Access Committee	78%	22%	0%	0%	0%
CSAC	80%	0%	20%	0%	0%

Source: American Community Survey 2018. Hispanic is considered as ethnicity.

* - Includes 24% White Hispanic.

F-1. The Capital Metro Advisory Committees

The Capital Metro Board has the authority to establish advisory committees consisting of resident citizens of Capital Metro's territory and pursuant to Section 451 of the Texas Transportation Code. The Board has adopted a policy and procedure related to advisory committees (see Resolution #1665, September 24, 2010), which is explained below.

Both the AAC and CSAC consist of nine members appointed by the Capital Metro Board members. The chairman of the Board has two appointments and each of the other Board members has one appointment. Committee members serve at the will of their appointing Board member and their term ends with the end of their appointing Board member's term.

The committee representatives represent diverse backgrounds, abilities and interests, including, but not limited to, those who may be limited English speaking or who have disabilities, or who have different levels of experience with public policy and group decision making. These members must live in the Capital Metro service area. There is a preference that members be transit users and may include residents, business owners, and other key stakeholders concerned about transit service in the service area.

As per statutory requirements, each member of the Capital Metro Board selects their appointees based on a recommendation from Capital Metro's President & CEO. These committees report directly to the Board. A member of any one of the advisory committees may not act in an official capacity except through the action of the Board.

The AAC serves as a resource to Capital Metro in promoting and educating the public regarding acceptance and usage of the transit system across jurisdictions and in suburban communities. It meets once a month at the Capital Metro headquarters located at 2910 E 5th Street.

The AAC regularly passes resolutions which advise the Capital Metro Board on upcoming service changes, programs, and policies related to individuals with disabilities. The AAC's highest level of authority is to provide advice and recommendations to the Board.

The CSAC assists Capital Metro in developing and maintaining a transit system that is convenient, dependable, and practical by providing advice and recommendations on planning, operations, services, and all other matters of concern to Capital Metro customers. CSAC members regularly use transit.

CSAC meets the second Wednesday of every month from 6 p.m. to 7:30 p.m. unless otherwise noted in monthly CSAC announcements. The public is always encouraged to attend a meeting of the CSAC. Meetings are currently held at the Capital Metro Transit Store, located at 209 W. 9th St.

Table 14 (on page 83) shows the racial breakdown of the two advisory committees in comparison to the Capital Metro service area. Currently, there are two vacancies to fill for CSAC. CSAC still shows a balanced racial diversity in members. However, all but one member of the AAC are Caucasian.

Though not classified as minority, the committee includes five people who have disabilities and four women. Both Capital Metro staff and committee members have asked additional minority persons to participate on the committee. Emphasis in selecting AAC members is focused on diversity of disabilities and a balance between members utilizing different types of Capital Metro services. Staff intends to increase its efforts to engage minority persons who have a strong interest in transportation for people with disabilities.

In an effort to bring diversity to Capital Metro's advisory committees, staff reached out to many minority organizations. These include: the Asian American Resource Center (a division of the City of Austin's Parks and Recreation Department), African American Resource Advisory Commission, African American Quality of Life Initiative, Black Chamber of Commerce, and Greater Austin Hispanic Chamber of Commerce. Capital Metro will continue its outreach to minority communities and organizations in order to improve minority representation in its advisory committees. Capital Metro's elected official Board members have also assisted with minority recruitment for both advisory committees.

G. ENSURING SUBRECIPIENTS' COMPLIANCE

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin for programs and activities receiving Federal financial assistance. Subrecipients, as part of the Interagency Agreement(s) with Capital Metro, certify compliance with the requirements of Title VI laws and regulations. To ensure that all subrecipients comply with Title VI regulations, Capital Metro provides assistance to all subrecipients and monitors their performance annually. The subrecipient monitoring process is summarized in the following pages.

G-1. Providing Assistance to Subrecipients

Capital Metro has developed procedures to provide assistance to subrecipients, distribute funds in an equitable and non-discriminatory way, and to monitor subrecipients' compliance with Title VI. Capital Metro is committed to ensuring that subrecipients agree to comply with the requirements of Title VI of the Civil Rights Act, 42 U.S.C. §2000d, and applicable regulations, in programs and activities receiving or benefiting from FTA funding. During the last three-year period, Capital Metro has provided a variety of assistance to subrecipients regarding Title VI, including but not limited to training, site visits, guidance, and also assistance through e-mails and phone calls.

Capital Metro required subrecipients to agree to and assure compliance with the requirements of Title VI by submitting certifications and assurances which are included in their subaward agreements. Capital Metro also performed annual reviews which included site visits. The reviews required subrecipients to demonstrate compliance with the FTA requirement to prepare a Title VI program containing at least the following information: Notice to beneficiaries of their rights under Title VI; Title VI complaint procedures and form; Title VI investigations, complaints, and lawsuits; inclusive public participation; meaningful access to persons with Limited English Proficiency (LEP); and minority representation on advisory bodies.

Since the issuance of the revised FTA Circular 4702.1B, Capital Metro has implemented procedures and trainings to educate its subrecipients on the enhanced requirements. Capital Metro will continue to provide subrecipients with assistance as needed in the form of supplemental materials including but not limited to:

- i. Sample documents: Title VI Program Updates, Notices to the Public, Complaint forms, Public Participation Plans, and Language Assistance Plans;
- ii. Demographic (Census) information.

G-2. List of Capital Metro Subrecipients

As of February 2021, there were eleven active subrecipients under Capital Metro. Table 15 (below) lists Capital Metro's subrecipients and the type of FTA assistance they receive.

Table 15. Subrecipients with Active Projects

Entity Name	Entity Type	Type of FTA Assistance Received	Adoption of Last Update
Austin Groups for The Elderly	Private Non-Profit Organization	Section 5310	September 2019
ARCIL, Inc	Private Non-Profit Organization	Section 5310	September 2019
Bluebonnet Trails Community Mental Health and Mental Retardation Center	Local Government	Section 5310	September 2020
Capital Area Rural Transportation System	Local Government	Section 5339(b)	May 2020
Drive a Senior Central Texas	Private Non-Profit Organization	Section 5310	December 2020
Drive a Senior West Austin	Private Non-Profit Organization	Section 5310	December 2020
Easter Seals Central Texas	Private Non-Profit Organization	Section 5310	August 2019
Faith in Action Georgetown	Private Non-Profit Organization	Section 5310	January 2018
Foundation for the Homeless	Private Non-Profit Organization	Job Access Reverse Commute	October 2018
Mary Lee Foundation	Private Non-Profit Organization	Section 5310	October 2019
Senior Access	Private Non-Profit Organization	Section 5310	September 2019

As a Designated Recipient of various FTA formula program grants, Capital Metro passes through some of the federal funds to these entities and is responsible for monitoring their compliance with FTA requirements. One subrecipient, Capital Area Rural Transportation System (CARTS), is also a direct recipient of FTA funds. As such, the FTA is responsible for monitoring their compliance with federal requirements. For the rest of the subrecipients, Capital Metro collects their approved Title VI programs and other related documents in a paper format or digitally. The detailed monitoring process is provided in the next section.

G-3. Subrecipient Monitoring Procedures

Subrecipients, as part of the project grant agreement(s) with Capital Metro, are required to certify compliance with the requirements of Title VI laws and regulations. Capital Metro collects Certification and Assurances from subrecipients prior to passing through FTA funds. **This Title VI Assurance is included in the agreement and is monitored annually.** Additional items, as listed

below, in relation to subrecipient's compliance with Title VI are monitored at a minimum once in three years:

1. **Approval of Title VI program:** Each subrecipient is responsible for providing Capital Metro a document that shows the approval of its Title VI program by its governing body.
2. **Title VI Notice to Beneficiaries:** A notice that subrecipient complies with Title VI and procedures the public may follow to file a discrimination complaint. Such a notice should be posted on the subrecipient's website, transit vehicles, transit centers, etc.
3. **Title VI investigations, complaints, or lawsuits:** A list of any Title VI investigations, complaints, or lawsuits filed against the subrecipient.
4. **Title VI Complaint Procedures:** A copy of their procedures related to filing of a Title VI complaint. It may include a complaint form, tracking system, and investigating procedures. These procedures must be available upon request.
5. **Minority Representation on Planning and Advisory Bodies:** In order to improve minority participation in the decision-making process, a subrecipient that has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the subrecipient, 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.
6. **Access to Services by Persons with LEP:** Either a copy of the LEP plan for providing access to meaningful activities and programs for persons with limited English proficiency which was based on the DOT LEP guidance or a copy of the alternative framework for providing access to activities and programs. It includes the identification and distribution of LEP persons as well as the guidance for language assistance measures.
7. **Summary of Outreach Efforts to Minority Population:** A public participation strategy that offers early and continuous opportunities for minority populations to be involved in transportation decisions. It involves outreach to community-based organizations serving minority and/or low-income populations through meetings and other means of communications.

G-4. Certification and Assurance – Title VI of The Civil Rights Act of 1964

Capital Metro keeps subrecipients' Title VI Program documents digitally and/or in paper format. The following Title VI Certification and Assurance is included in the Capital Metro grant agreement with its subrecipients:

"Article 15. TITLE VI PROGRAM

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

Title VI of the Civil Rights Act, 42 U.S.C. § 2000d, and its implementing regulations, the Subrecipient shall adopt and submit to Capital Metro a Title VI Civil Rights Program (Title VI Program) that complies with the requirements set forth in FTA Circular 4702.1B. Capital Metro shall have the right to monitor and audit Subrecipient's Title VI program and program records to ensure compliance with this provision.

A. The Subrecipient must provide Capital Metro a certificate and assurance of its compliance with Title VI on an annual basis. The Subrecipient is responsible for providing Capital Metro evidence of approval of its Title VI Program by its governing body.

B. The Subrecipient must adopt procedures relating to how members of the public may file a Title VI complaint and make the procedures available to Capital Metro upon request.

C. The Subrecipient must post a notice that the Subrecipient complies with Title VI and the procedures for the public to file discrimination complaints on its website and prominently displayed in its facilities and if providing transportation services, in its vehicles.

D. The Subrecipient shall compile and maintain a list of complaints, investigations, or lawsuits relating to its Title VI Program and submit such list to Capital Metro upon request.

E. If Subrecipient has transit-related non-elected planning boards, advisory councils, or committees (Committees), the membership of which is selected by the Subrecipient, the Subrecipient 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 Subrecipient must submit all the above information to the Capital Metro on a schedule requested by Capital Metro.

F. The Subrecipient shall adopt a plan to provide access to meaningful activities and programs for persons with limited English proficiency (LEP Plan) based on DOT guidance or a copy of the alternative framework for providing access to activities and programs which shall include the identification and distribution of persons with limited English proficiency as well as guidance for assistance for language assistance measures.

G. The Subrecipient shall adopt a public participation strategy that offers early and continuous opportunities for minority populations to be involved with transportation decisions. Such outreach efforts shall include community-based organizations serving minority and/or low-income population through meetings and other means of communications.

H. The Subrecipient shall comply with other requirements as Capital Metro may request from time to time."

H. DETERMINATION OF SITE OR LOCATION OF FACILITIES

According to the FTA Circular, a Title VI equity analysis must be conducted if a federal recipient constructs a facility, such as a vehicle storage garage, maintenance facility, or operations center, to determine the local environmental impacts on minority and low-income populations. This does not include bus stops or transit centers because these are classified as transit amenities.

Capital Metro has not constructed a storage, maintenance, or operations center since 2018 that requires land acquisition and the displacement of persons from their residences and businesses. Also, it has no plans to construct any such facilities at a new location in FY 2021.

III. Requirements for Fixed Route Transit Providers



A. SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

This section details Capital Metro's system-wide service standards. This section addresses the reporting requirements as described under Chapter IV of the Circular 4702.1B applicable to Fixed Route Transit Providers. Supporting documentation can be found in the Appendix to this Report.

Purpose

Capital Metro connects people, jobs and communities by providing quality transportation choices. Service guidelines and standards reflect the goals and objectives of Capital Metro.

Guidelines and standards are service planning tools that help maintain balance between the demand and allocation of service. Primary applications include the planning, evaluation, and implementation of services. Service guidelines and standards do not determine operations policies or procedures.

Overview

Service guidelines provide a framework for the provision, design, and allocation of service. Service guidelines incorporate transit service planning factors including residential and employment density, land use, activity centers, street characteristics, and demographics. Design criteria include defining service attributes such as route directness, span, frequency, stop spacing, and passenger amenities. Service guidelines are to be used with some flexibility.

Service standards include methodology by which services are evaluated in terms of productivity and cost-effectiveness. Schedule reliability, load factors, and ridership performance help identify high and low performing routes. This methodology is to be applied regularly and rigorously. A series of corrective actions may be taken to address specific issues.

Update

Capital Metro staff conduct a review of service guidelines and standards biennially to ensure alignment with goals, objectives, and resource availability. This allows an opportunity to revise content based on recent experience and best practices.

Service types

Throughout this section, a set of common group names are used to describe similar services. These groups are designed to permit evaluation of a given route relative to the performance of similar routes within the system. This approach avoids the difficulty of comparing routes with fundamentally different designs, purposes, and operating characteristics.

Service classification:

Core services	
Radial	Local stop service on primary corridors connecting to downtown Austin
Crosstown	Local stop service on primary corridors that bypass downtown Austin
Limited	Limited stop service on primary corridors
Feeder	Local stop service from low-density areas to transit centers
Express/Flyer	Limited stop commuter service
MetroRail	Limited stop commuter and urban rail service

UT Shuttle	
Radial	Limited stop radial service in areas with dense UT population
Circulators	Local stop service within campus

Special services	
Night Owl	Late night/early morning service on primary corridors
Senior	Midday service between senior housing and shopping and medical
Rail Connector	Service between rail stations and areas of employment or activity
Flexible	Local and flex stop service from low-density areas to transit centers
Reverse Commute	Service between downtown Austin and outlying major employers
Ebus	Late-night/early morning safe ride service from entertainment district

The Capital Metro Board adopted service guidelines and standards to evaluate the performance of the fixed route and express bus operation – from passenger safety to hours of bus operation to bus stop location standards. In addition, Capital Metro Planning Department has an adopted policy which addresses Vehicle Assignment. In order to fulfill the reporting requirements, this Report includes Vehicle Load, Vehicle Headway, Service Availability, On-time Performance, Distribution of Transit Amenities, and Vehicle Assignment. The following are the standards and quantifiable criteria that will be used by staff to determine adherence with the service standards and policies as they are periodically reviewed.

A-1. Vehicle Load Factor

Load factors reflect the ratio of passengers to total seated capacity. Load factors vary by route type and time of day. Overcrowding on buses often indicates the need for improved frequency or increased capacity. Load factors should not exceed the following thresholds (See Table 16):

Table 16. Maximum load factor standards

Route type	Peak hours	Off-peak hours
Radial	140%	120%
Crosstown	140%	120%
Limited	140%	120%
Feeder	140%	120%
Express/Flyer	100%	100%
MetroRail	140%	120%
UT Shuttle	140%	120%

A-2. Vehicle Headway or Service Frequency

Service frequency has a major influence on transit ridership. Frequent service is costly to provide but is valued by regular and occasional customers. It is also regarded as an attractive characteristic by potential customers. Table 17 shows the minimum frequency standards.

Due to the expense of providing frequent service, frequency is based upon existing or potential demand, translating into variations in frequency throughout the day. Clock headways (frequency intervals of 15, 20, 30, 40, or 60 minutes) are preferred as they are easier for passengers to remember and can help facilitate better transfer connections between routes.

Table 17. Desired minimum frequency

Route type	Weekday			Saturday	Sunday
	Peak	Midday	Night		
Radial	30	60	60	60	60
Crosstown	30	60	60	60	60
Limited	20	30	Based on demand	Based on demand	Based on demand
Feeder	30	60	Based on demand	Based on demand	Based on demand
Express/Flyer	20	-	-	-	-
MetroRail	40	60	-	-	-
UT Shuttle	20	20	40	-	60

A-3. On-time Performance (Schedule Reliability)

On-time performance is a critical measure of the quality and reliability of services. Buses are considered on-time if they depart a designated timepoint between 30 seconds earlier or 5 minutes and 30 seconds later than scheduled.

Buses should never depart a timepoint more than 30 seconds ahead of schedule unless operators are given explicit permission to do so. Permission to depart early should only be provided for destination stops on limited stop or Express services during peak travel hours.

Under normal circumstances, system-wide on-time performance should exceed 90% at end of line locations, and 75% at timepoints along the route. Services that fall below the guideline should be examined to determine the factors behind schedule adherence problems, which may include running time problems, traffic conditions, construction, or other issues.

A-4. Service Availability

Residential and employment density are primary influences on transit demand. Service coverage guidelines reflect industry standards for minimum density needed to support cost-effective transit service.

Contiguous areas of the following densities are deemed transit supportive and should be prioritized for transit service within walking distance ($\frac{1}{4}$ mile):

- Residential densities of 16 persons per acre or
- Employment densities of 8 employees per acre

A-5. Distribution of Transit Amenities

❖ Bus stop spacing

Bus stop spacing is based on several factors including customer convenience, ridership demand, and service type.

Customer convenience involves a tradeoff between proximity to stops and bus travel time. Closely spaced stops reduce customer walking distance but result in slower bus speeds. Few stops spaced further apart increase walking distance but result in faster, more reliable service.

Sufficient ridership demand is necessary to support the investment of stops. Specific service types such as limited stop and express require increased stop spacing to maintain higher speeds, while radial and crosstown services have frequent stops to maximize ridership potential.

Stops serving downtown Austin or major activity centers should be spaced at least 800 feet apart. Regular local stops on arterial streets should be spaced every 800-1,200 feet. In suburban and other low-density areas, stops may be spaced over 1,200 feet.

❖ **Bus stop placement**

Bus stop placement involves a balance of customer safety, accessibility, and operations. All stops should be fully accessible with a concrete landing and access to sidewalk or pathway. Bus stops should be compatible with adjacent land use and minimize adverse impacts on the built and natural environment.

Bus stops should be placed at intersections to maximize pedestrian safety. Near-side and far-side stops are generally preferred over mid-block stops. Specific ridership generators may determine the placement of a bus stop.

Near-side stops allow passengers to board and alight closer to intersection crosswalks, which may facilitate better transfers. Near-side stops also eliminate the potential of alighting passengers waiting through a red light.

Far-side stops are preferred at intersections in which buses make left turns and intersections with a high volume of right turning vehicles. Far-side stops are also preferred on corridors with transit signal priority. Far-side stops encourage pedestrians to cross behind the bus.

Mid-block stops should only be considered if pedestrian crosswalks are present. Mid-block stops may be the only option at major intersections with dedicated turn lanes.

Infrastructure considerations for bus stop placement include lighting, topography, and roadside constraints such as driveways, trees, poles, fire hydrants, etc.

❖ **Bus stop amenities**

Bus stop amenities improve customer comfort and convenience. They also have the potential to increase ridership. Bus stop improvements should promote regional equity rather than focusing on select corridors or areas.

Bus stops generating at least 50 daily boardings qualify for a shelter. Shelters may be considered for stops with 25 daily boardings meeting at least 3 of the following criteria:

- Adjacent major activity/employment centers
- Adjacent hospitals or social service agencies
- Adjacent apartments with 250+ units
- Adjacent schools
- Route intersections
- Service frequency greater than 30 minutes

Bus stops generating at least 15 boardings per weekday qualify for a bench. All bus stops with shelters or benches should also have a litter container. Other stops may have a litter container installed upon request.

Bike racks may be installed at stops in areas of high demand or in concert with other local entities.

Circumstances that might preclude installation of amenities at a stop meeting threshold warrant are as follows:

- Amenities would threaten pedestrian or operational safety.
- Adequate right-of-way is not available.
- Regulations enforced by City, County, State, or Federal government.
- Service to the location is subject to potential changes.
- Installation and maintenance costs are excessive.
- Other circumstances that would negatively impact operations or service.

Bus stop signage should contain route name and number, Capital Metro Customer Service phone number, and website address. Detailed schedule and route information should be provided at major boarding locations and transfer points.

A-6. Vehicle Assignments

The following memorandum explains the practices of vehicle assignments exercised at Capital Metro's 2910 East 5th St. facility and its North Operations Garage at McNeil Rd.

ATTACHMENT A

TO: Planning Staff

FROM: Planning Staff

DATE: March 26, 2015

SUBJECT: Vehicle Assignments by Block and Type (Daily Services)

The following memorandum explains the practices of vehicle assignments exercised at Capital Metro's 2910 East 5th St. facility and its North Operations Garage at McNeil Rd.

Process

As part of each regular service change mark-up, the Planning Department recommends the type of vehicle to be operated on a particular block assignment and route. Various factors are considered when determining these assignments.

Once Planning and Scheduling teams finalize schedules, vehicle blocking assignments required to meet daily operations are started. Assignments are reviewed for entire day operations for Weekday, Saturday and Sunday. However, since Weekday vehicle requirements are the maximum for the agency, this particular day is reviewed more extensively and divided into Morning Peak, Midday, Afternoon Peak, Evening and Late Night requirements.

Vehicle Types by Particular Route Services

Due to the nature of several particular routes in operation, items such as interior/exterior vehicle features and seating types/configurations can influence a vehicle assignment type. The following are route services that require particular vehicle types due to the nature of their operations:

- Express Services – Two types of vehicles are used for this particular service; the 40' Suburban (40' SUB) and 45' Over the Road Coach (45' ORC). Both vehicles use particular seating types suited for long distance travel. Assignments between the two types are based on passenger loads.

- Over the Road Coach (45' ORC) – For efficiency of vehicle utilization, Capital Metro regularly interlines blocks between various route services. However, due to the height and length of this particular vehicle interlines must be limited for use on only Express route operations.
- University of Texas Shuttle – Due to special design schemes on units to identify their use on this particular system, particular buses are assigned to this set of services
- MetroRapid – This federally grant funded program requires use of newly purchased and specialized vehicles for this particular service.

Comprehensive Review of Vehicle Types for All Services

For all routes not uniquely associated with a particular vehicle type, staff uses the following steps to determine appropriate vehicle assignments.

- 1) Trapeze Scheduling software is used to export a file for each day of scheduled operations that lists the block, garage pull-out time and garage pull-in time by day of service (i.e. Weekday, Saturdays, Sundays, Thursday Only, Friday Only, etc.).
- 2) This table of Raw Data is then calibrated to determine its “Make Ready” time.
 - a) The calculation used to determine the “Make Ready” time for a bus uses the scheduled garage pull-out time and allows 3 hours prior to this time as the time when this vehicle must be available for service operation. This ensures that adequate time is available to complete scheduled and unscheduled maintenance work on a vehicle prior to its intended use.
- 3) Planning uses the following data for the most recent time period prior to the scheduled mark-up to help identify initial vehicle type assignments. Information for each of the following is listed in order of frequency to determine priority of vehicle type changes.
 - a) Automatic Passenger Counter (APC) data – Information by route and block are used to identify blocks where maximum passenger loads are exceeding the service standard set for that vehicle and route type. For instance, for local multiple stop service, standing loads are allowed during Weekday morning and afternoon peak hours. However, for Express services which must travel on the highway, only full seated loads are recommended for vehicle types used on this service.
 - b) Radio Delay Logs – Daily listing of all delays related to passenger and capacity loads are reviewed for all blocks. Information catalogues, time of day, day of week, vehicle type in use and location of occurrence.
 - c) Customer Call Reports – Daily calls related to complaints regarding overloads or crowding are reviewed for all blocks. Information is not as detailed compared to other sources, but follow-up is made with customers and field checks are completed by route supervisors to gather more information.
- 4) A comprehensive list is developed depicting blocks, make ready time, garage pull-in time, duration, other assignments (such as School Trips or Interlines) and initial vehicle types based on data outlined in item 3) or particular route services (i.e. Trolley and Express).
- 5) This list is then displayed as Weekday Morning Peak (start of service to 8:30am); Midday (8:30am to approximately 1:00pm); Afternoon Peak (approximately 1:00pm to midnight) and Late Night (specialized services operating until 3am such as EBus, Starlight/Moonlight and Night Owl). Saturday and Sunday operations are listed in the same format.

- 6) Staff must then work to ensure that the maximum available vehicle by type is not exceeded during any of the listed time periods. The maximum available vehicle available by type is calculated as the maximum peak required multiplied by 1.2 (Federal Transit Administration calculations allow for 20% spare ratio). Thus, in the following example, a maximum requirement of 42 vehicles of a particular type, would require 50 vehicles available in the fleet. When this cannot be met, the following steps are needed:
 - a) Identify marginal routes (those that do not normally record ridership issues) and determine whether a change in their initial assignment can assist.
 - b) Identify “tripper” blocks (those whose duration is approximately 1-2 hours) and determine whether a change in their initial assignment can assist.
 - c) Identify those blocks with Interlines and School Trips and verify ridership to determine whether a change in their initial assignment can assist.
- 7) The completed recommended assignments by block and day of operation are then entered into the Trapeze System for use by Maintenance, Yard Supervisors and Operations staff daily.
- 8) During the course of the mark-up, information will begin to be received via operators, customers or data to indicate possible issues with a particular vehicle assignment on a block. When an issue arises, the following steps will be taken:
 - a) Field Verification is to be made by a Route Supervisor within 24 hours of the initial report of an issue. The supervisor is to speak to the operator (particularly if this person is assigned daily to the block) and report back findings.
 - b) Planning staff reviews Radio Logs, APC’s to identify whether this issue has been recorded and its frequency.
 - c) Planning staff initiates a process to schedule a Ridecheck to confirm if additional information is required.

If findings indicate a problem with the assigned vehicle type, then staff must begin the process outlined in step 6) to find a solution. If a particular vehicle type cannot be identified to assist with this situation, then staff must work with the Operations Team to determine whether a “Que” bus or other “tripped” service can assist the situation until a permanent schedule and/or route change can occur at the next mark-up.

B. COLLECTION AND REPORTING OF DEMOGRAPHIC DATA

This section shows demographic service profile maps and information on travel survey.

B-1. Demographic and Service Profile Maps and Charts

Demographic Data

In order to assess the effects of the Capital Metro services, various maps were produced, and data gathered on minority and low-income populations within the Austin service area (see Figure 13-14). Both a visual and database analysis of minority, median household income, and population density was accomplished by using Geographic Information Systems (GIS) software. Census data from the base year 2010 was utilized in each case.

In the case of median household income and minority percentage, both ends of the spectrum were examined by looking at the tracts with both the highest and the lowest incomes and minority percentages. Figure 14 shows the distribution of low-income tracts within Capital Metro service area.

Minority Areas

The census definition of minority groups includes Black, Asian, American Indian, and Other (including individuals of Hispanic origin or multi-racial groups). The average percentage of minority population within the Capital Metro service area was approximately 50 percent. Figure 13 shows the percent minority by census tracts with Capital Metro services overlaid. The high minority areas were mostly located east of I-35, which are in east central and north and southeast parts of the service area. These areas have relatively good access to public transit offerings as shown in Figure 13. Low minority areas were spread throughout the west, north, and northwest, but were more prevalent on the periphery.

Low-Income Population

Figure 14 shows the distribution of low-income population by tracts. Lower income areas were concentrated mostly in the center, north, and south parts of the service area. Lower income areas were concentrated in and around the University of Texas due to the concentration of students living in those areas. Most of these areas are adjacent or near multiple transit routes. Also, there is an isolated low-income area located in the extreme northwest part of the service area which does not have much access to transit. This area is very sparsely populated. High income areas were located throughout the west, north, and southwest parts of the Capital Metro service area and were more likely to be in the newer parts of Austin or the surrounding communities. The Capital Metro service area poverty level for a family of four was calculated to be \$29,999 by the Agency.

Population Density

The areas with the highest population density are those with higher concentrations of residential development and thus a greater demand for mobility. In 2018, the population density per square

mile averaged 2,174 for the census tracts in the Capital Metro service area. Figure 25 (page 133) shows the population density of the Austin metro area. The highest density areas are clustered in central, south, and north parts of Austin metro area and have relatively good access to public transit. The most densely populated areas of the region include those with high concentrations of UT students (West Campus, Far West, and Crossing Place) and affordable rental housing (Rundberg, St. John's, Riverside/Oltorf, Dove Springs). Additional pockets of high residential density are scattered across the service area.

Figure 13. Distribution of Minority Population within Capital Metro Service Area

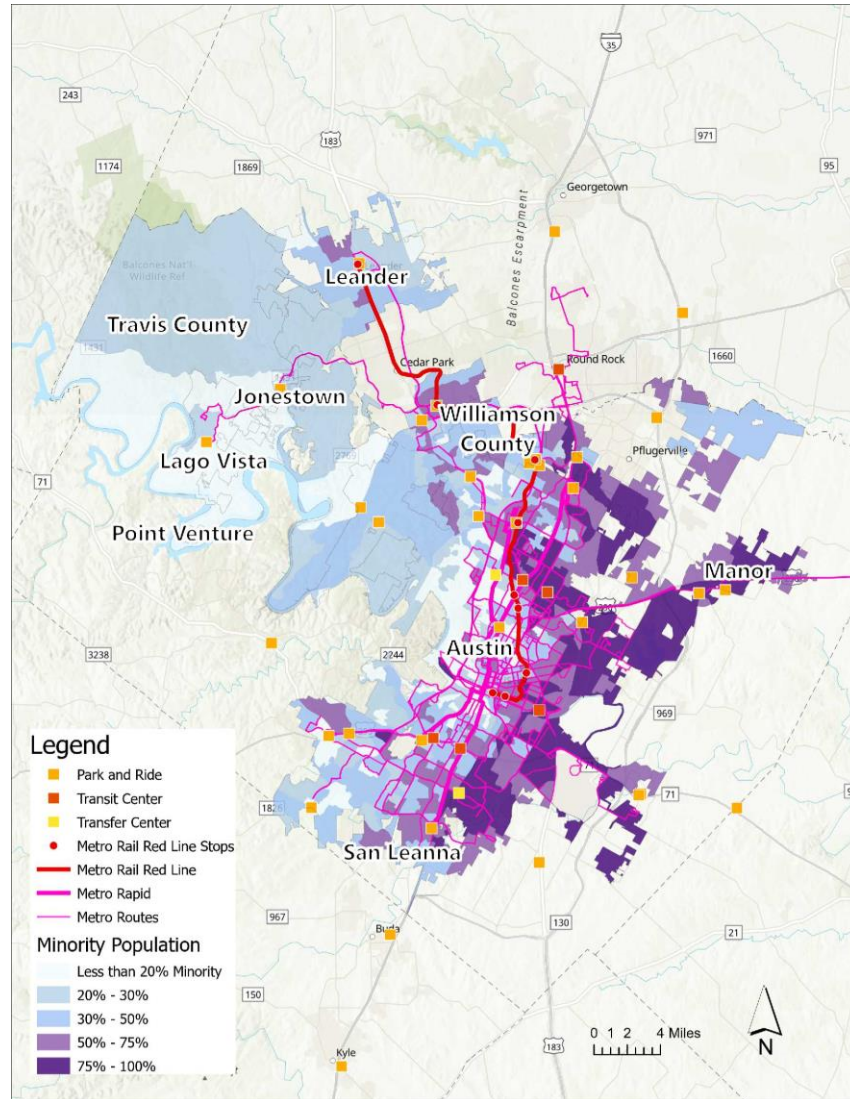
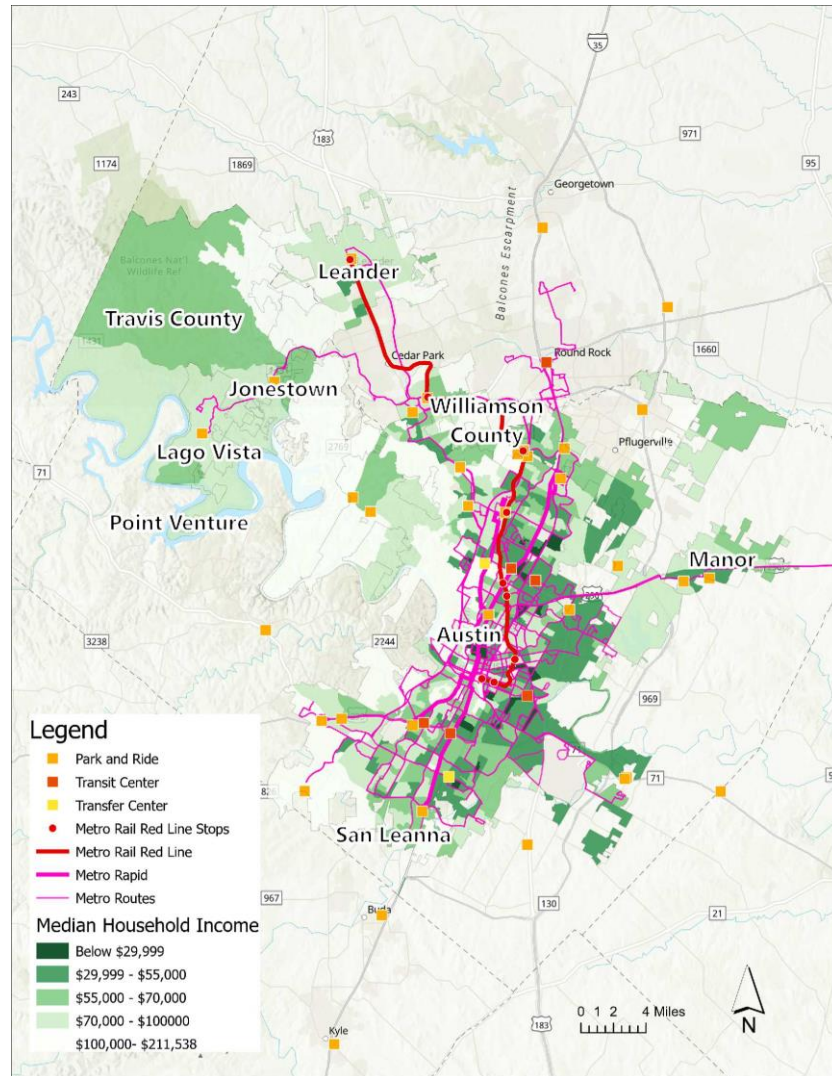


Figure 14. Distribution of Low-income Population within Capital Metro Service Area



B-2. Ridership Demographics and Travel Patterns

Origin and Destination and Customer Satisfaction Surveys:

Capital Metro was unable to conduct its scheduled Origin and Destination ridership survey in 2020 due to the ridership decrease during the pandemic that would not provide an accurate picture of longer time ridership trends. Capital Metro is monitoring ridership data to identify when stability is reached in terms of service & ridership in order to conduct the survey. Although a return to regular ridership trends is unpredictable at this time, Capital Metro expects the survey to be done by fall of 2022, and we will include that information in the 2024 Title VI update. Capital Metro has requested for a waiver from FTA on the delay of collecting demographic data since we are currently completing 2021 Title VI Program update and it has been more than 5 years since the last time VI demographic data was collected in 2015.

The 2015 Origin and Destination and Customer Satisfaction Surveys provide the most current and up to date information on items such as: rider demographics, ridership trends, loyalty, and customer satisfaction. The 2015 Origin and Destination Survey contains information collected by Creative Consumer Research, a contractor hired by the Planning Department, where research surveyors conducted 21,153 surveys which included general rider interviews on board Capital Metro's rail and fixed route bus systems. The survey contained questions used to determine specific information measured in the report such as: frequency of ridership, income, age, and race/ethnicity. Information from the survey was used to complete the tables found in the demographic profile. Questions taken directly from the report were cross tabulated to get more specific demographic data used for the analysis. The survey was also available in Spanish (Appendix B page 138).

In addition to gauging patrons' riding experience, the 2015 surveys also provided demographic information such as age, annual household income, gender, and race/ethnicity, including the following information:

- According to the surveys, 32% of general riders are between the ages of 19-25, while the 26-39 age group accounts for 30% of Capital Metro riders. Patrons who are 65 years and older account for only 3% of Capital Metro ridership (See Figure 15).
- The annual household incomes of general riders vary, with 12% of the population earning between \$10,000 and \$19,999. About 15% of general riders make between \$20,000 and \$29,999. Only 10% of Capital Metro's general riders make over \$60,000 (Figure 17).
- The surveys also provides information about the gender of its riders. For fixed and express routes, about 60% are male and 39% are female. In regard to race/ethnicity, 20% of Capital Metro general riders are African American, 31% Hispanic, 37% Caucasian, 7% Asian, and 3% belongs to other groups. With respect to MetroRail, 70% of Rail riders are Caucasian, while 15% are Hispanics and only 6% are African American. Due to Capital Metro's diverse population some

minority groups may be affected anytime a change is proposed to the Fixed Route system; however, we do not expect changes proposed to MetroRail to affect minority populations given the demographic profile currently exhibited.

- According to the FTA, low income is defined as, a person whose median household income is at or below the Department of Health and Human Services' poverty guidelines. Capital Metro's Planning Department has referenced poverty as 125% of the federal definition of poverty for a family of four. The poverty level for a family of four is \$21,200 and if a 125% measure, as noted above is applied, it would equate to a threshold of \$26,500. However, because information from the survey is collected in \$10,000 increments, low income would be referenced mostly as individuals who make less than \$29,999. Capital Metro's Survey does not have information to pinpoint the threshold of \$26,500.

Figure 15. Age of General Riders

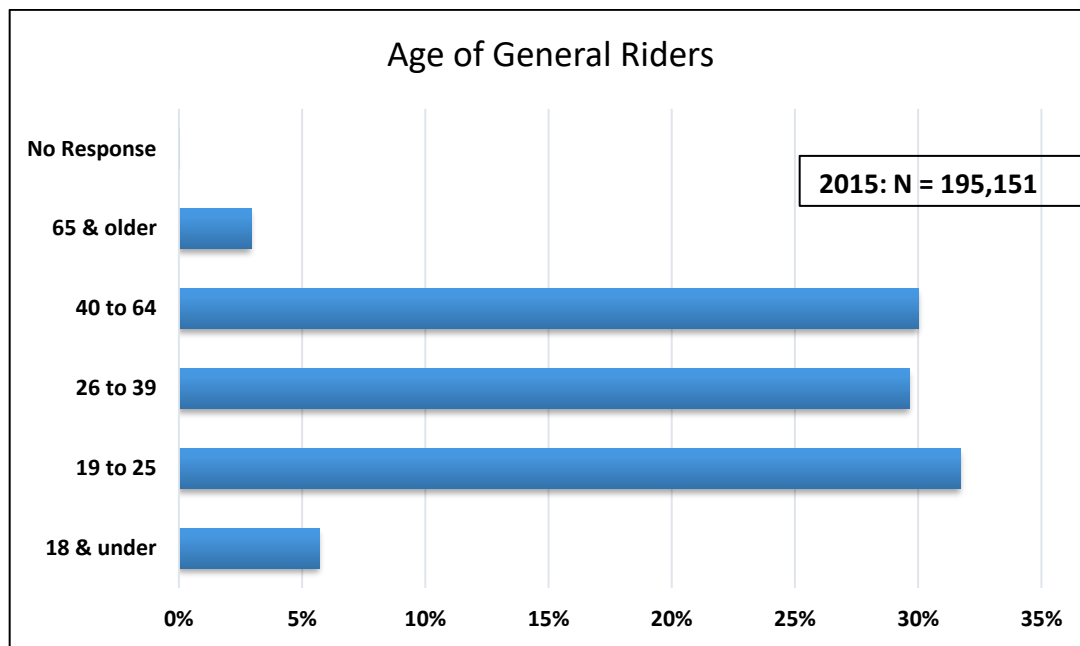
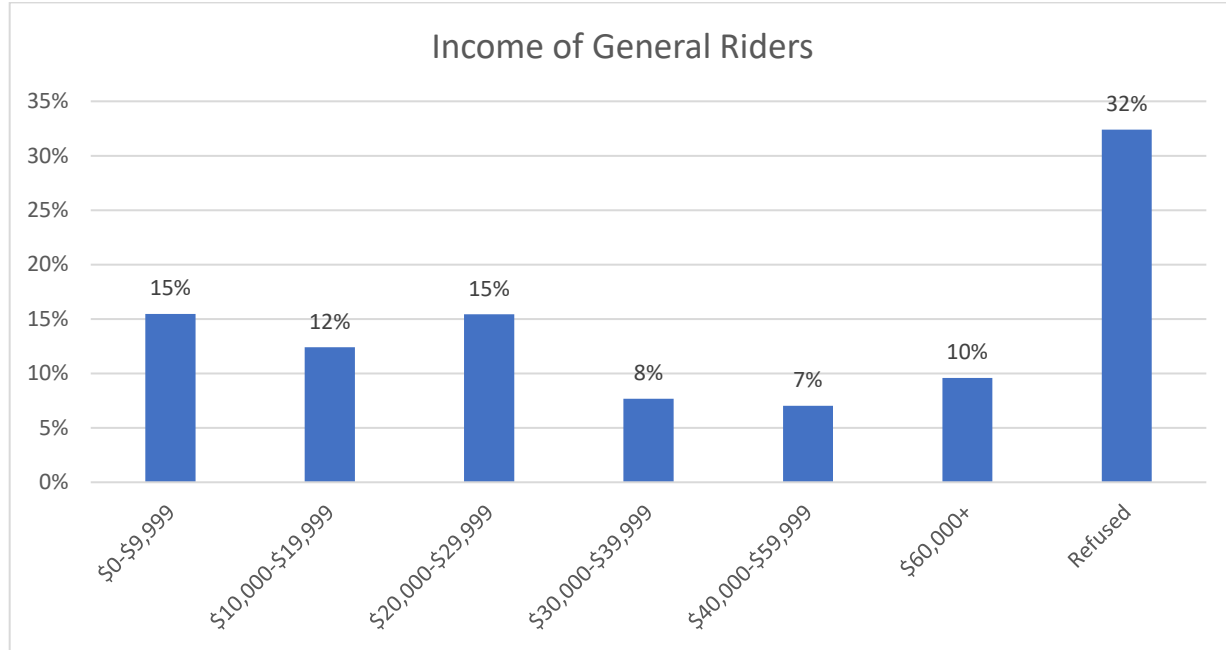


Figure 15 represents Capital Metro ridership by age. Over 60% of Capital Metro riders are between the age of 19 and 39, while 3% of riders are over 65 of age.

Figure 16. Income of General Riders

42% of Capital Metro riders have an income below \$29,999 while only 25% of riders reported to make above \$30,000 (Figure 16).

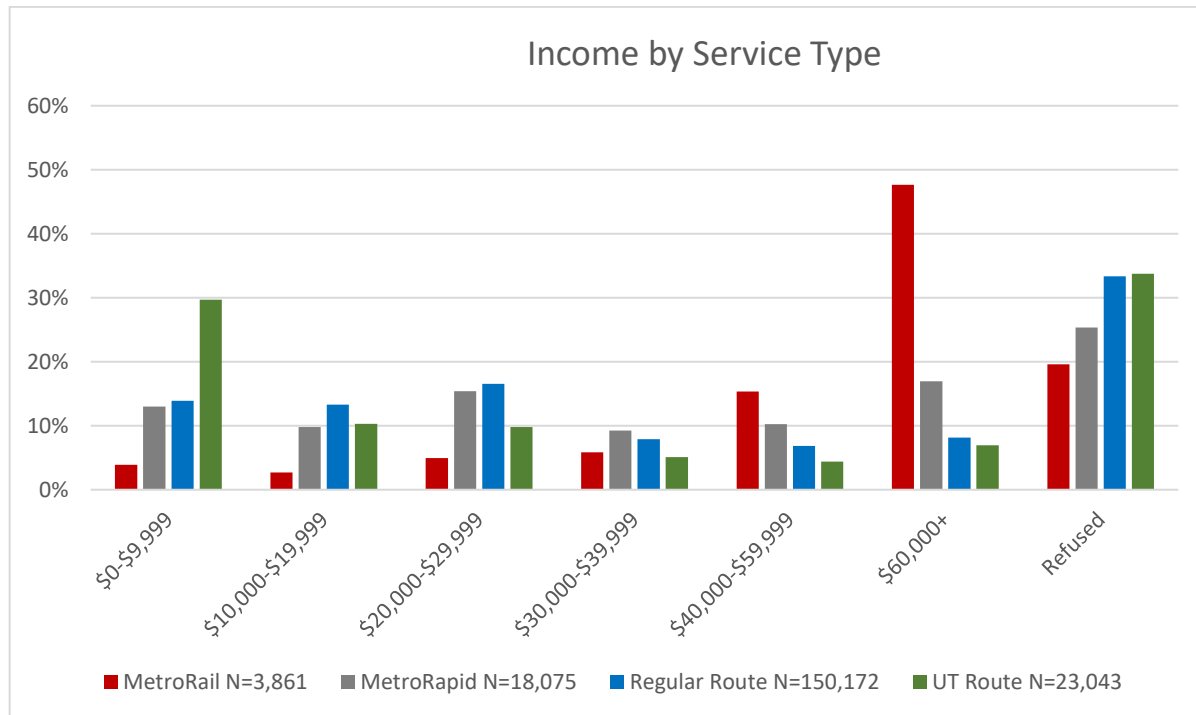
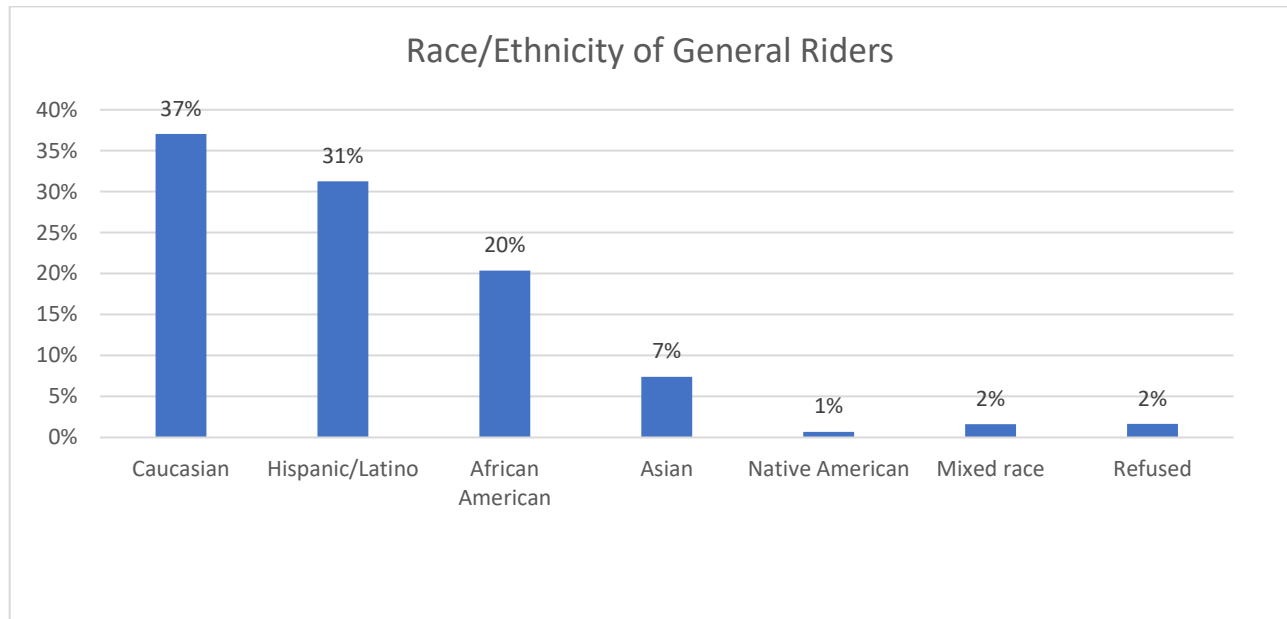
Figure 17. Household Income of Riders by Service Type (Regular, UT, Rail)

Figure 17 above provides Capital Metro ridership by income and service type. A significant portion of riders other than rail earn less than \$30,000.

Table 18. Age by Income for General Riders

Age	\$0-\$9,999	\$10,000-\$19,999	\$20,000-\$29,999	\$30,000-\$39,999	\$40,000-\$59,999	\$60,000+	Refused
18 & under	7%	3%	3%	3%	2%	3%	9%
19 to 25	43%	28%	28%	26%	23%	24%	35%
26 to 39	19%	29%	34%	36%	40%	40%	25%
40 to 64	27%	35%	32%	32%	32%	31%	27%
65 & older	3%	4%	2%	3%	2%	2%	3%
No Response	0%	0%	0%	0%	0%	0%	0%

Table 18 provides a representation of Capital Metro ridership cross-tabulated using age and income information.

Figure 18. Race/Ethnicity of General Riders

Figures 18 and 19 provide a representation of Capital Metro ridership by race/ethnicity. Figure 18 shows that African Americans, Hispanics and Asians account for over half of Capital Metro ridership (61%) of the general ridership. However, when ethnicity is viewed by service (Figure 19), Caucasians are the predominant users of the Metro Rapids, University of Texas, and Rail services.

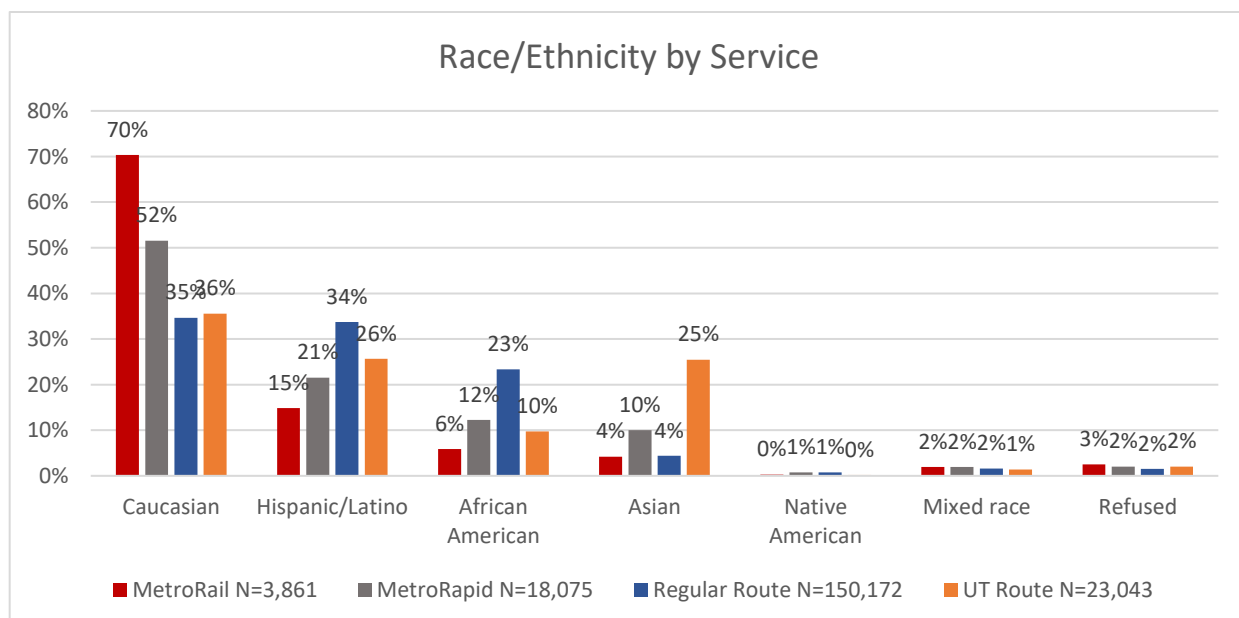
Figure 19. Race/Ethnicity by Service

Table 19. Income by Race & Ethnicity

Race	\$0-\$9,999	\$10,000-\$19,999	\$20,000-\$29,999	\$30,000-\$39,999	\$40,000-\$59,999	\$60,000+	Refused	Grand Total
African American	17%	15%	16%	6%	5%	5%	35%	100%
Asian	23%	8%	12%	4%	7%	11%	36%	100%
Hispanic/Latino	13%	14%	19%	8%	7%	6%	33%	100%
Mixed race	15%	13%	11%	7%	8%	11%	35%	100%
Native American	22%	14%	12%	5%	5%	14%	28%	100%
Refused	10%	7%	8%	6%	4%	6%	59%	100%
White/Anglo	15%	11%	13%	9%	9%	15%	29%	100%
System Average	15%	12%	15%	8%	7%	10%	32%	100%

African Americans and Hispanics make up over half of Capital Metro's ridership (Table 19). Nearly half of African Americans riders earn less than \$30,000 annually. The same is also true for Capital Metro's Hispanic ridership population. The system average shows that about 42% of Capital Metro patrons earn less than \$30,000 per annum. Low income would be referenced mostly as individuals who make less than \$29,999.

Figure 20. Transit Dependency

2015 Household Vehicles

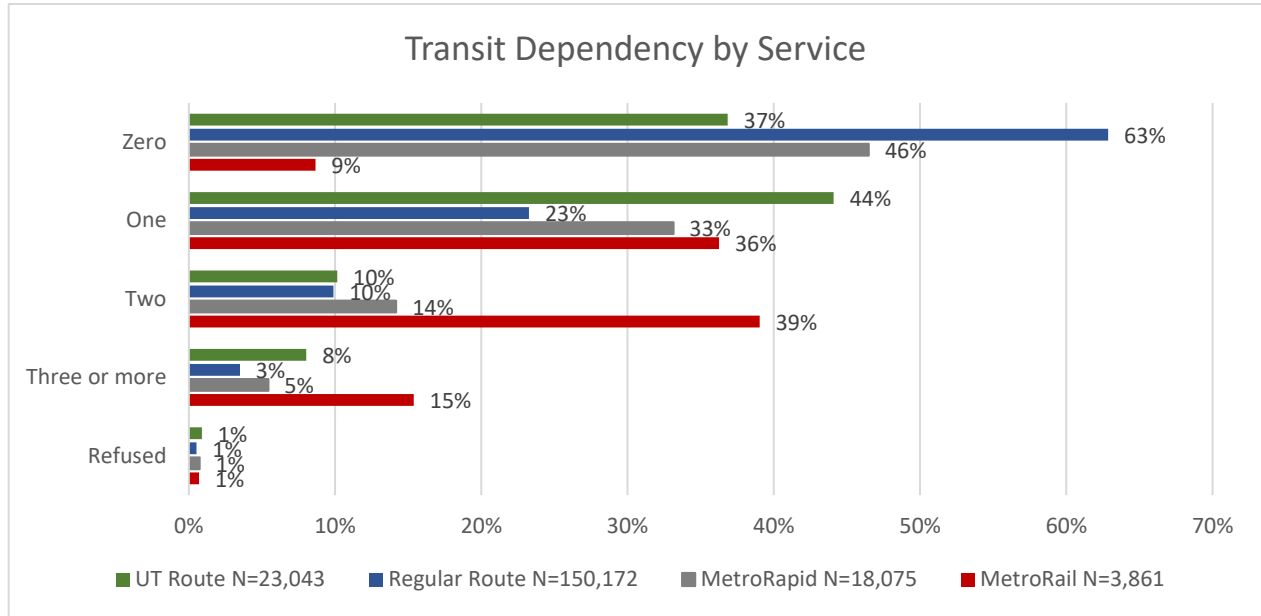


Figure 21. Options to Use Household Vehicle

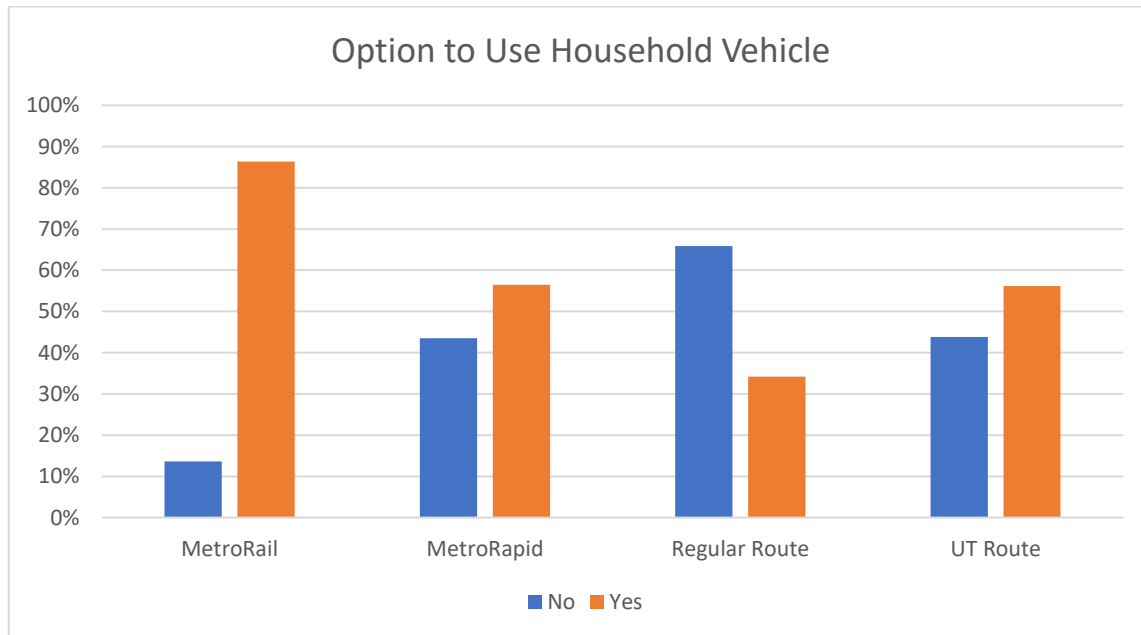
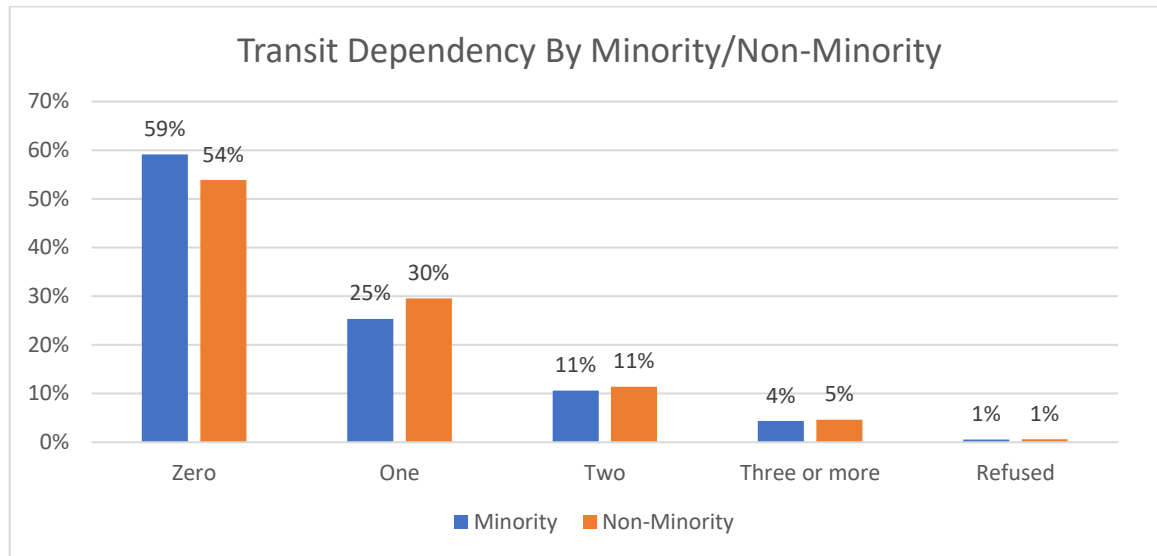
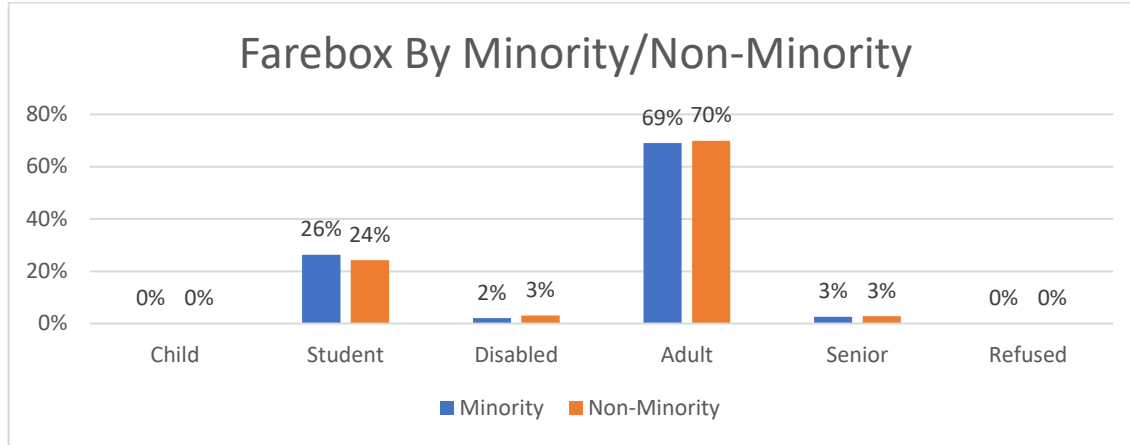
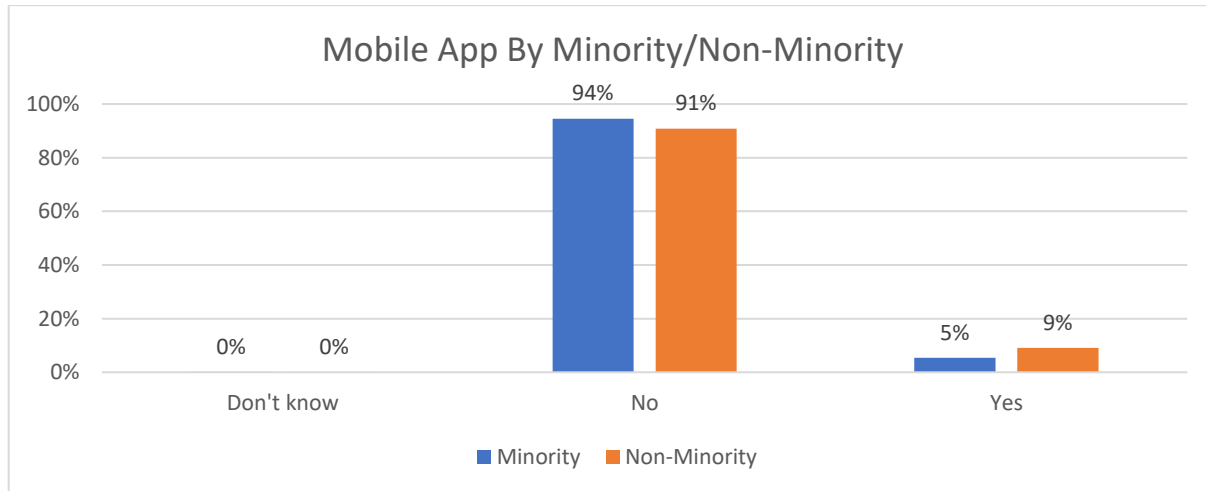


Figure 22. Transit Dependency – Minority and Non-Minority

Figures 20-22 provide various transit dependency information. Transit dependent riders consist of individuals who have no access to a vehicle or other means outside of Capital Metro to take a trip. Choice riders are riders who have other alternatives to make their trip. Choice riders (34%) ride the regular route system less than transit dependent riders (66%). 63% of regular route riders do not have any vehicle. Figure 22 shows minority and non-minority riders have a very similar transit dependency based on ownership of vehicles.

While the majority of those riding the Local/Express routes do not have a working vehicle available in their household, most MetroRail riders have at least one working vehicle in their household. 86% of Rail riders chose to ride the rail when they could have used a personal vehicle. This is in stark opposition to riders of the Fixed and Express routes, which by comparison, have extremely limited ability to use a personal vehicle for their daily travels. UT and MetroRapid riders also have limited options to use a personal vehicle.

Figure 23. Farebox usage**Figure 24. Mobile App usage – Minority and Non-Minority**

Figures 23 and 24 show minority and non-minority have a very similar usage pattern on farebox and mobile app.

C. EVALUATION OF SERVICE AND FARE CHANGES


This section provides information on Capital Metro's policies regarding service and fare changes. The applicable Board-approved resolution is available in Appendix A.

C-1. Service And Fare Equity Analysis (SAFE) Policies

On June 28, 2021, Capital Metro Board adopted revised SAFE policies that were initially done in 2013. Three separate policies: Major Service Change Policy, Disparate Impact (DI), and Disproportionate Burden (DB) are being consolidated into one policy. The highlights of changes are provided below.

- Changes to major service change policy include:
 - Removing specific references to modes to make the policy universal.
 - Clarifying that a Major Service Change is defined as a change of 25% or greater in the number of annual revenue hours/miles provided. The policy used to define a Major Service Change as “more than 25% of its route miles” and “25% or greater change in the number of daily service hours”.
 - Added exceptions such as road closures, emergency service adjustments associated with weather or other emergency conditions, and circumstances beyond the control of Capital Metro such as construction.
 - Added language that all fare changes will result in an equity analysis.

DRAFT Title VI Policies

	TITLE VI POLICIES: Major Service Change, Disparate Impact, Disproportionate Burden Mgr., Office of Diversity	Issued: 6/28/2021 Revised: Approved by: Board of Directors
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Purpose

Title VI of the Civil Rights Act of 1964 (codified at 42 U.S.C. §2000D et seq.) prohibits discrimination on the basis of race, color, or national origin. As a recipient of federal funds, Capital Metropolitan Transportation Authority (Capital Metro) must ensure that it provides its services without discrimination on the basis of race, color, or national origin.

On October 1, 2012, the Federal Transit Administration (FTA) Title VI Circular 4702.1B became effective, requiring transit providers that have greater than 50 fixed-route vehicles in peak service operating fixed-route service to conduct equity analyses on service or fare changes that meet the agency’s definition of a “Major Service Change”. The purpose of this policy is to define what constitutes a “Major Service Change” and to establish thresholds for determining if service and fare changes would result in either a “Disparate Impact” on minority populations or a “Disproportionate Burden” on low-income populations.

Definitions

The following terms and definitions are to address the FTA Title VI Circular 4702.1B (October 1, 2012) and relate to the policies below.

- **Adverse Effects/Impacts** - Adverse effects/impacts are defined as impacts that may have negative consequences as a result of a contemplated service or fare change. An adverse effect for service can be defined as a geographical or temporal reduction in service that includes but is not limited to: elimination of a route, rerouting an existing route, or a decrease in frequency or span of service. For fare changes, an adverse effect can include, but is not limited to: increases in average fare, reduction of discounts for passes or groups of riders, or a reduction in access to discounted fare products such as those that may result from the introduction of new fare payment technology or other actions. Capital Metro will consider the degree of adverse effects, and analyze those effects, when planning Major Service Changes and all fare changes.
- **Disparate Impact** - A neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where Capital Metro's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- **Disproportionate Burden** - A neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires Capital Metro to evaluate alternatives and mitigate burdens where practicable.
- **Emergency Service Adjustment** - Changes to routes, service frequencies, or service spans that may be necessitated by emergency situations (weather or otherwise) or a major catastrophe that severely impairs public health or safety, results in changes in access to public streets or rights-of-way, or restricts the ability to access Capital Metro equipment needed to operate service.
- **Environmental Justice** - The fair distribution of the benefits and/or the burdens associated with Federal programs, policies, and activities, including recipients of Federal funding such as Capital Metro.
- **Equity Analysis** - Analysis of proposed service or fare changes to determine if the burdens and benefits are equally distributed between minority and non-minority populations, and low-income and non-low-income populations.
- **Fare Change** - An increase or decrease in the riders' fare whether applicable to the entire system, or by mode, or by type of fare product or fare media. All fare changes regardless of the magnitude would require a Fare Equity Analysis, not including exceptions.

- **Fixed-Route** - Refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.
- **Low-Income population** - For purposes of this policy, low-income population is defined as any readily identifiable group of households who are at or below 125% of the United States Department of Health and Human Services Poverty Guidelines.
- **Minority Persons** - Persons who self-identify as being non-white under the United States Census Bureau guidelines. This includes American Indian and Alaskan Native, Asian, Black or African American, Hispanic, Latino or LatinX, and Native Hawaiian or Other Pacific Islander.
- **Minority Population** - Any readily identifiable group of minority persons who live in geographic proximity and if circumstances warrant, geographically dispersed/transient populations (such as migrant workers of Native Americans) who will be similarly affected.
- **Service Adjustment** - Any changes to service, such as reductions or increases to frequency, hours of operation (service span) or routing. Not all service adjustments will be considered Major Service Changes.
- **Title VI** - Title VI of the Civil Rights Act of 1964 (codified at 42 U.S.C. §2000D et seq.) prohibits discrimination on the basis of race, color or national origin by programs and activities receiving federal financial assistance.

Major Service Change Policy and Use

The Major Service Change Policy has been developed in compliance with applicable federal requirements (Title VI of the Civil Rights Act 1964, 49 CFR Section 21 and FTA Circular 4702.1B). All Major Service Changes will be subject to a Service Equity Analysis that includes an analysis of adverse effects, as previously defined, along with any associated positive impacts. Capital Metro shall consider the degree of adverse effects, and analyze those effects, when planning Major Service Changes. Additionally, when changes to service or fares involve improvements, the accrual of benefits should also be analyzed.

Capital Metro will conduct a Title VI Service Equity Analysis whenever there is a Major Service Change, as defined below.

A Major Service Change is defined as the following:

1. The establishment of new fixed-route bus route;
2. The elimination of any fixed-route bus or rail route in its entirety;
3. A geographic change on a given transit route of 25% or more of its annual revenue miles;
4. A change of 25% or greater in the number of annual revenue hours provided; or
5. Six months prior to the opening of any new fixed-guideway project (e.g. BRT line or rail line) regardless of whether or not the amount of service being changed meets the requirements above.

A Major Service Change is not defined as the following:

- Temporary additions to service lasting less than 12 months;
- Route renumbering with no underlying change;
- Schedule or service adjustments required by a third party that operates or controls the same right-of-way (such as road closure);
- New fixed-route bus or rail “Break in period” prior to the commencement of revenue service, lasting less than 12 months;
- Emergency service adjustments associated with weather or other emergency conditions; or
- Operations that result from circumstances beyond the control of Capital Metro (such as construction).

Capital Metro will conduct a Fare Equity Analysis under Title VI whenever a Fare Equity Analysis is required, as defined below.

A Fare Equity Analysis is required for the following:

- a. All fare changes, regardless of the percent of increase or decrease, are subject to a Fare Equity Analysis when contemplating a change; or
- b. For fare changes associated with the opening of a new fixed-guideway project, an equity analysis must be completed six months prior to the commencement of revenue service.

A Fare Equity Analysis is not required for the following exceptions:

- a. “Ozone Action Days” or other instances when Capital Metro has declared that all passengers ride free;
- b. Temporary fare reductions that are mitigating measures for other actions. For example, a reduced fare for passengers impacted by the temporary closure of a segment of a rail system for construction; or
- c. Promotional fare reductions. If a promotional or temporary fare reduction (such as response to emergency) lasts longer than six months, then FTA considers the fare reduction permanent and the transit provider must conduct a fare equity analysis.

Capital Metro will also conduct a Service Equity Analysis for changes which, when considered cumulatively over a three-year period, meet the Major Service Change threshold. For Major Service Changes, the Service Equity Analysis will assess the quantity and quality of service provided and populations affected.

Equity Analyses will be based on the most recent passenger survey data for fare analyses, and ridership or census block group data for service changes if ridership survey data is not appropriate for the analysis undertaken.

Each Title VI Equity Analysis will be presented to the Capital Metro Transportation Authority Board of Directors for its consideration and the results will be included in the subsequent Capital Metro Title VI Program Update with a record of action taken by the Board.

Disparate Impact Policy and Use

This Disparate Impact Policy establishes a threshold that identifies when the adverse effects of a Major Service Change (defined above) as well as any fare changes, are borne disproportionately by minority populations (defined above), discovered through the conduct of a Service or Fare Equity Analysis.

Service and Fare Equity Analyses will compare existing service or fares to the proposed changes being contemplated, and calculate the absolute change as well as the percent change experienced by both minority and non-minority populations or riders.

For Service and Fare Equity Analyses, a Disparate Impact threshold of 2% will be used to determine if minority riders are more adversely affected, or less positively affected by the proposed change.

- Service or fare changes are determined to have a Disparate Impact on minority populations if the adverse impacts experienced by minority riders is greater than 2% when compared to the adverse impacts experienced by non-minority populations.
- Additionally, if benefits associated with service or fare changes accrue to non-minority populations greater than 2% when compared to minority populations, then this change will be determined to have a Disparate Impact.

Disparate Impact Mitigations

Should a proposed Major Service Change and/or Fare Change result in a Disparate Impact, Capital Metro will consider modifying the proposed change to avoid, minimize or mitigate the Disparate Impact of the change. If Capital Metro finds potential Disparate Impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate Disparate Impacts, Capital Metro will reanalyze the proposed changes in order to determine whether the modifications actually removed the potential Disparate Impacts of the changes.

After analyzing proposed mitigations, if a less discriminatory alternative does not exist, Capital Metro may implement the proposed change only if:

- Capital Metro has a substantial legitimate justification for the proposed change; and
- Capital Metro can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish Capital Metro's legitimate program goals.

Where disparate impacts are identified, Capital Metro will provide a meaningful opportunity for public comment on any proposed mitigation measures, including the less discriminatory alternatives that may be available.

Disproportionate Burden Policy and Use

The Disproportionate Burden Policy establishes a threshold that identifies when the adverse effects of a Major Service Change (defined above) as well as any fare changes are borne disproportionately by low-income populations, discovered through the conduct of a Service or Fare Equity Analysis. While low-income populations are not a protected class under Title VI, there is a recognized overlap in environmental justice principles and the FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes.

Equity Analyses will compare existing service or fares to the proposed changes and calculate the absolute change as well as the percent change experienced by both low-income and non low-income populations or riders.

For Service and Fare Equity Analyses, a Disproportionate Burden threshold of 2% will be used to determine if low-income riders are more adversely affected, or less positively affected, by the proposed change.

- Service or fare changes are determined to have a Disproportionate Burden on low income populations if the adverse impacts experienced by low-income riders is greater than 2% when compared to the adverse impacts experienced by non low-income populations.
- Additionally, if benefits associated with service or fare changes accrue to non low-income populations is greater than 2% when compared to low-income populations, then this change will be determined to have a Disparate Impact.

Disproportionate Burden Mitigation

Should a proposed Major Service Change and/or Fare Change result in a Disproportionate Burden, Capital Metro will take steps to avoid, minimize or mitigate impacts when practicable. Capital Metro should also describe the alternatives available to low-income riders affected by service changes.

C-2. Public Outreach for the Title VI Policies

Capital Metro conducted public outreach as required by the FTA Circular. Four meetings were held from Friday, April 30th through Wednesday, May 19th throughout the service area during day and evening hours. Presentations were in English and Spanish. For the virtual public presentations closed captioning was also available.

- Friday, April 30th at 10 am – Presentation to One Voice. Representatives from thirteen organizations attended including Transit Empowerment Fund, Reentry Roundtable, Central Texas Food Bank, Meals on Wheels, Community First Village, Travis County Healthy and Human Services Department, Community Advisory Network, Any Baby Can, Goodwill Central Texas, and Drive a Senior.
- Monday, May 3rd at 6:00 pm: Virtual Public Meeting held on Zoom, Facebook, and Youtube.
- Monday, May 10th at 5:00 pm: Virtual Project Connect Equity Tool Catalysts.
- Wednesday, May 19th at 6:00 pm: Virtual Public Meeting held on Zoom, Facebook, and Youtube.

A public hearing was held on May 12 at 12pm where the presentation was made and comments received. In addition, a presentation was made to the Access Committee at their monthly regularly scheduled meeting on Wednesday, May 5th and to the CSAC Committee at their monthly regularly scheduled meeting on Wednesday, May 12th.

C-3. Processes for Conducting Equity Analyses

Chapter IV of the Title VI Circular 4702.1B talks about the requirements for all transit providers 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 to prepare and submit service and fare equity analyses. Capital Metro falls in this category and is required to evaluate the impacts that would result from a major service change or any fare changes, to ensure that minority populations are not disparately impacted from these changes.

Capital Metro is also required to conduct such an analysis on the impacts to low-income populations. Low-income populations are not a protected class under Title VI. However, as mentioned in the circular, recognizing the inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes.

Capital Metro has adopted a Major Service Change policy as well as Disparate Impact and Disproportionate Burden policies which are identified at the beginning of this section. All service changes that meet Capital Metro's threshold of a major service change as well as any fare changes that are proposed are required for conducting an impact analysis to determine whether a disparate impact toward minorities or a disproportionate burden toward low-income populations will occur. Capital Metro also defines its policies for what constitutes a disparate impact and a disproportionate burden in this section.

The following evaluation focuses on those changes where services will be either realigned, eliminated, or added. Our evaluation:

- Assesses the effects of the proposed changes on minority and low-income populations.
- Assesses the alternatives available for people affected by these changes.
- Determines which, if any of the proposals would have a disproportionately high effect on minority and low-income riders.
- Describes the actions Capital Metro will take to minimize, mitigate or offset any adverse effect of these changes on minority and low-income riders.

Low-income is considered as 125% of the federal poverty level. Capital Metro has identified household incomes less than \$29,999 as low-income. The threshold for this is set at 18% which is the reported percentage of Low-Income households for Travis County (of which over 95% of Capital Metro's Service Area encompasses).

Capital Metro combines information from Census Tract and Automatic Passenger Counter bus stop level data to evaluate impacts on routes that receive major service changes. To determine disproportionate impacts to populations within the Capital Metro service area, minority and low-income populations are quantified by route for all impacted census tracts. For the analysis, Capital

Metro used 2010 Census for Minority identification and 2015 American Community Survey for Income.

The thresholds that are used in the equity analysis for Capital Metro population demographics are 33% for minority population (which is changed to 50% in recent policy update) and 18% for low income population. When the percentages for impacted minority populations were higher than the threshold, impacts were considered disparate. When the percentages for impacted low-income populations were higher than the threshold, impacts were considered as a disproportionate burden on transit dependent low-income populations. Capital Metro then has identified the actions and/or alternatives to minimize, mitigate or offset any adverse effect of these changes on minority and low-income riders.

The fare equity analysis examined the impact of the proposed fare changes on minority and low-income riders and whether that impact is of a disproportionate nature to the impact on the ridership as a whole. According to 2015 Origin & Destination Survey, Capital Metro ridership demographics are 61% minority and 43% low-income. The analysis looked at the alternatives available for those affected by the increases and the attempts to minimize, mitigate or avoid any impacts to the protected classes and low-income. The document described Capital Metro's efforts to engage the public in its decision-making process regarding the proposed fare changes. Equity analyses were conducted during the planning process and were submitted to the board for approval.

C-4. Summary of Equity Analyses for Service and Fare Changes and Board Approved Resolutions 2018-2020

Since the last triennial update of the Title VI Program, there were three service changes that met the adopted threshold of being considered a "major service change," which requires a minimum of 25% service change of revenue hours or miles of any route, or a service elimination, or a service addition. All other service changes were considered minor and a Title VI equity analysis would not have been necessary. In addition, there was a fare change that occurred in 2018 that required equity analysis.

All equity analyses examined the impact of the proposed service or fare changes on minority and low-income riders and whether that impact had a disparate impact and/or disproportionate burden for the ridership as a whole. It looked at the alternatives available for those affected by the service or fare changes and attempted to avoid, minimize, or mitigate any impacts to the protected classes and low-income population. Finally, the document described Capital Metro's efforts to engage the public in its decision-making process regarding the proposed service or fare changes.

Capital Metro used the guidelines of Circular 4702.1B for these equity analyses. Changes analyzed according to adopted policies and thresholds for disparate impact and disproportionate burden in order to comply with new federal guidelines. The list of all equity analyses conducted during the last three years is provided below with summary of changes, mitigations if needed, timeframes, and board's approval dates.

Fare Equity Analysis

❖ January 2018 Fare Equity Analysis.

- Capital Metro started a pilot program to offer free fares to all students in grades K-12. Initially, this pilot project was proposed to run for four months. But due to its success, Capital Metro made this project permanent where students of grades K-12 will always ride free. Teenagers can get a free ride using their school ID while children five and younger with an accompanying adult always ride free under the existing fare structure. This project allowed all kids to take advantage of free and safe public transportation to explore the region and have better access to summer programs and beyond.
- To compliment this fare change, Capital Metro also started offering free fare for MetroAccess riders who are under 19 years of age. MetroAccess is the ADA paratransit service of Capital Metro. Since Capital Metro is reducing a type of fare, it examined if the benefit from the proposed fare reduction was distributed to minority and low-income riders equitably.
- Capital Metro collected the boarding data for all K-12 students who rode buses during the trial phase. This customer segment was not required to have any type of pass, therefore, a special Key on the farebox was set up to collect data for K-12 students.
- Then, Capital Metro used GIS to geocode and group those points into polygons. These polygons were overlaid on minority and low-income layers. The rider counts were generated by selecting the rider count polygons that have their centroid within a minority or low-income tract. Since there was no data available on race or income of those student riders, Capital Metro assumed that riders who boarded from minority or low-income tracts very likely belonged to those groups. This was the closest race or income data we could get to study the equity analysis.
- Capital Metro found a significant number of students boarded the buses from minority or low-income tracts. 82% are from minority tracts and 85% are from low-income tracts. The possibilities were: 21% more minority students than the average and 39% more low-income students than the average got this benefit of a free fare.
- When applying the Board adopted Disparate Impact and Disproportionate Burden Policies, this analysis demonstrated that the proposed free fare for K-12 students would not have any disparate impact and disproportionate burden on minority and low-income populations, respectively. Based on the location of students' boarding in minority and low-income tracts, there was a significant benefit to minority and low-income populations from this fare reduction.
- This analysis was approved by the board in December 2018.

Service Equity Analysis

❖ August 2018 Service Equity Analysis

- Capital Metro proposed a new Route 493 senior Route for implementation in August 2018. It fell under the definition of a “major service change” and triggered a Title VI Equity Analysis.
- Capital Metro received a Section 5310 Grant in 2016 to evaluate and implement Senior type routes with the goal of connecting senior living centers and major activity centers. The route was designed with the help of data provided by the Travis County Health and Human Services. Additional data used in the design of the service was provided by Capital Metro’s Office of Mobility Management and MetroAccess. The new service had received letters of support from several area agencies that supports seniors including Area Agency on Aging.
- This analysis found no disparate impact on minorities or the classes protected by Title VI because this new service would serve predominantly minority population. All census tracts were minority tracts and the overall minority population was 71%, well above 33% threshold.
- This analysis also found no disproportionate burden on low-income riders since this service would serve predominantly low-income population. All except one tract is below the poverty level and the overall low-income population is 34%.
- This service would be concentrated in an area where a significant portion of Minority and Low-Income populations would receive a direct benefit. The grant funds received from CAMPO were limited to particular type of service. There was no additional mitigation required for minority or low-income riders at this point.
- This analysis was approved by the board in July 2018.

❖ June 2019 Service Equity Analysis

- Capital Metro proposed Route 470 for elimination and introduced a new demand response service, Pickup, in Manor to mitigate lost services to existing riders. Route 470 Manor Circulator began service in June 2016. The route was operated once an hour between 7:00 a.m. and 7:00 p.m. Monday through Friday and between 10:00 a.m. and 5:00 p.m. on Saturday. The route served an urgent care, Walmart, Post Office, City Hall, and a park & ride. In 2018, the average weekday ridership was 7 and the average Saturday ridership was

3. Due to the low ridership, Capital Metro proposed to replace the fixed route service with a demand response service called Pickup.

- Pickup is a mobility on demand service that would allow users to schedule rides within a designated zone through an app or by phone. Users would be picked up within 15 minutes of scheduling the ride. The vehicles would be vans or small buses that were wheelchair accessible. Zones were designed to provide access to Capital Metro bus routes and destinations within the zone.
- The Pickup service in Manor was provided in partnership with Travis County to allow for service outside of Capital Metro's service area. This allowed for links to goods and services from most of the neighborhoods in and around Manor.
- The proposed transition of Route 470 to Pickup service creates a potential disparate impact analysis since the population along the route was minority & low-income:
 - All census tracts were minority – overall minority population was 66%, well above 33% threshold.
 - All except two tracts were poverty – overall poverty population was 19%.
- Capital Metro determined that the impact to minority and low-income populations would be minimized by providing Pickup service. The Pickup service could be accessed by more residents than Route 470. It would provide access to more locations and the wait to access transit would likely be less. Service was eliminated on Saturday due to the very low ridership of 3 boardings per Saturday.
- This analysis confirmed that there might be a disparate impact on minority populations or the classes protected by Title VI. However, it was minimized and mitigated by a new Pickup service that provided transit access to more people. Additionally, disproportionate burden might exist on low-income riders, however, it was too mitigated by the new Pickup service. This new Pickup service was the best alternative to minimize the impact on minority and low-income riders. In fact, this service would encompass greater number of minority and low-income riders than the existing Route 470. So, there was no additional mitigation required for minority or low-income riders at this point.
- This analysis was approved by the board in March 2019.

❖ Board Approved Resolutions

3.2.a



**RESOLUTION
OF THE
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS**

**STATE OF TEXAS
COUNTY OF TRAVIS**

**RESOLUTION (ID # AI-2018-930)
Fare Structure Change for K-12 Students**

WHEREAS, pursuant to the Texas Transportation Code Sec. 451.061(D) the Capital Metropolitan Transportation Authority is required to impose reasonable and nondiscriminatory fares, tolls, charges, rents and other compensation for the use of the transit authority system sufficient to produce revenue, together with the tax revenue received by the authority in an amount adequate to pay all expenses necessary to operate and maintain the transit authority system; and

WHEREAS, the Capital Metro Board of Directors endeavors to accomplish the objectives of the fare policy adopted by the board in 2011; and

WHEREAS, the Capital Metro Board of Directors desires to provide for free fares for K-12 students in order to provide access to the system for this segment of the population; and

WHEREAS, the Capital Metro Board of Directors has sought input from the public at a public hearing as required by the Fare Policy; and

WHEREAS, Capital Metro has conducted a Fare Equity Analysis for the proposed change to the Fare Structure as is required by FTA Title VI Circular 4702.1B and finds no disparate impact or disproportionate burden on minority and low-income individuals.

NOW, THEREFORE, BE IT RESOLVED that the Capital Metropolitan Transportation Authority Board of Directors adopts a change to the Capital Metro Fare Structure to provide for Free Fares for K-12 students with a valid student ID and MetroAccess passengers under the age of 19 on all Capital Metro services and authorizes the President & CEO, or his designee, to implement the change immediately.


Secretary of the Board

Date: December 5, 2018

Attachment: Resolution-AI-2018-930 (CMTA-2018-95 : Fare Structure Change for K-12 Students)

Attachment: TITLE VI COMPLIANCE REPORT Final (4889 : Approval of Title VI Policy Revisions)

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6.6.a



RESOLUTION
OF THE
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS

STATE OF TEXAS
COUNTY OF TRAVIS

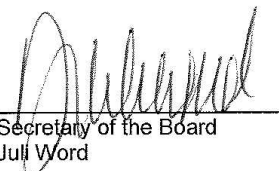
RESOLUTION (ID # AI-2018-844)
August 2018 Service Changes

WHEREAS, the Capital Metropolitan Transportation Authority Board of Directors and Capital Metro management endeavor to support the recent changes of CapRemap which were designed to provide cost-effective fixed-route transit services that respond to and build ridership demand while minimizing impacts on current riders; and

WHEREAS, the Capital Metropolitan Transportation Authority Board of Directors and Capital Metro management recognize the need to consider citizen comments and staff recommendations received during several public meetings and at the June 18, 2018 Public Hearing; and

WHEREAS, an equity analysis (required under the Federal Transit Administration's (FTA) Title VI to ensure no disparate impact (minority) or disproportionate burden (low-income) occurs on affected populations) was not required for these minor Service Changes because they did not exceed the minimum threshold of change of more than 25% of any one service.

NOW, THEREFORE, BE IT RESOLVED by the Capital Metropolitan Transportation Authority Board of Directors that the President & CEO, or his designee, is authorized to implement August 2018 Service Changes described in the attached document beginning Sunday, August 19, 2018.


Secretary of the Board
Juli Word

Date: July 30, 2018

Attachment: Resolution-AI-2018-844 (CMTA-2018-51 : Proposed August 2018 Service Changes)

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Attachment: TITLE VI COMPLIANCE REPORT Final (4889 : Approval of Title VI Policy Revisions)



**RESOLUTION
OF THE
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS**

**STATE OF TEXAS
COUNTY OF TRAVIS**


**RESOLUTION (ID # AI-2019-984)
June 2019 Service Changes**

WHEREAS, the Capital Metropolitan Transportation Authority Board of Directors and Capital Metro management endeavor to support the recent changes of Cap Remap which were designed to provide cost-effective fixed-route transit services that respond to and build ridership demand while minimizing impacts on current riders; and

WHEREAS, the Capital Metropolitan Transportation Authority Board of Directors and Capital Metro management recognize the need to consider citizen comments and staff recommendations received during several public meetings and at the March 13, 2019 Public Hearing; and

WHEREAS, an equity analysis, required under the Federal Transit Administration's (FTA) Title VI finds no disparate impact (minority) or disproportionate burden (lowincome) on affected populations.

NOW, THEREFORE, BE IT RESOLVED by the Capital Metropolitan Transportation Authority Board of Directors that the President & CEO, or his designee, is authorized to implement June 2019 Service Changes described in the attached document beginning Sunday, June 2, 2019.



Secretary of the Board
Eric Stratton

Date: 3/25/19

Attachment: Resolution-AI-2019-984 (CMTA-2019-17 : Approval of Proposed June 2019 Service Changes)

Attachment: TITLE VI COMPLIANCE REPORT Final (4889 : Approval of Title VI Policy Revisions)

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D. MONITORING OF TRANSIT SERVICE

The following section details Capital Metro's service monitoring results.

Introduction

Federal Transit Administration (FTA) Circular 4702.1B requires providers of public transportation that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more to monitor the performance of their transit system relative to their system-wide service standards and policies at least once every three years. Capital Metro meets this threshold and monitors its service every three years.

The FTA service monitoring program requires transit agencies to monitor the performance of minority routes compared to non-minority routes against their service standards. The FTA requires agencies to monitor:

1. Vehicle Load standard.
2. Vehicle Frequency standard.
3. On-Time Performance standard.
4. Service Availability standard.
5. Transit Amenities policy.
6. Vehicle Assignment policy.

Capital Metro's service monitoring process has two steps:

1. Determine minority routes.
2. Assess the performance of each selected route compared to the board approved Service Guidelines and Standards.

Classification of Routes

The first step was to classify routes as minority and non-minority. A minority transit route is defined as one in which at least one-third of the revenue miles are located in a Census block group where the percentage of minority population exceeds the Capital Metro defined minority population threshold (50%). Using Census data, Planning determined that 48 of Capital Metro's 70 routes⁷ are classified as minority routes.

Capital Metro chose to monitor all of its routes. This provides a greater level of precision by avoiding "luck of the draw" issues if a random sample is used. Luck of the draw means that if good performing routes are selected the results will be more positive. If poor performing routes are selected, the results will be more negative.

⁷ Routes 50, 51, 150, 152 are Round Rock routes and Capital Metro is not responsible for their Title VI since Round Rock is a direct recipient. Routes 214, 410, 411, 412, 490, 491, 492, and 493 are exempt from service monitoring due to their operating characteristics. Route 214 is contracted and does not have load factor data. Routes 410, 411, and 412 are OTP exempt. Routes 490, 491, 492, and 493 are senior shopping routes that only operate one day per week.

The following sections assess the performance of minority routes to non-minority routes using Capital Metro's Service Guidelines and Standards⁸. All analysis used February 2020 data. Capital Metro chose February 2020 since this is the last month with full system operation and ridership prior to the impacts of the COVID-19 pandemic.

Vehicle Load

Load factor is the ratio of passengers to total seated capacity. Capital Metro's Service Standards state that the load factor should not exceed the following percentages:

- Express/Flyer routes: 100% of seated load during peak and off-peak hours.
- All other routes: 140% of seated load during peak hours and 120% during off-peak hours.

An analysis of February 2020 ridership data showed that:

- Neither minority nor non-minority routes exceed service standard.
- Minority routes have larger loads in the midday compared to non-minority routes.
- Minority routes have more ridership and therefore have a higher load factor.

Table 20. Vehicle Load

Average Performance	Average Peak Load Factor	Average Standard	Average Midday Load Factor	Average Midday Standard
Minority Routes	.30	1.30	.35	1.15
Non-Minority Routes	.30	1.30	.27	1.15

Vehicle Frequency

Vehicle frequency describes how often a bus passes by a bus stop during an hour.

An analysis of February 2020 ridership data showed that:

- Neither minority or non-minority routes exceed service standard.
- Minority routes are less frequent than non-minority routes during the midday.
- Capital Metro recently increased frequency on five minority routes: 1, 7, 10, 20, & 300. This will improve the performance of minority routes compared to non-minority routes.

Table 21. Frequency standards

Average Performance	Average Peak Frequency	Average Standard	Average Midday Frequency	Average Midday Standard	Average Night Frequency	Average Standard	Average Weekend Frequency	Average Weekend Standard
Minority Routes	22.7	22.9	32.3	38.3	37.1	40	32.8	48
Non-Minority Routes	21.2	22.9	28.5	38.3	32.5	40	27.5	48

⁸ http://capmetro.org/uploadedFiles/Capmetroorg/About_Us/Service_Changes/capital-metro_service-guidelines-and-standards.pdf

On-Time Performance

Capital Metro considers buses on-time if they depart a designated timepoint between 0 seconds earlier and 6 minutes later than scheduled. System-wide on-time performance (OTP) should exceed 82%. Capital Metro's overall OTP is 81.5%.

An analysis of February 2020 ridership data showed that:

- Both minority and non-minority routes fail to meet Capital Metro's OTP standard.
- Minority routes perform worse than non-minority routes.

Table 22. On-time performance

Average Performance	Average Peak Load Factor	Average Standard
Minority Routes	70%	82%
Non-Minority Routes	74%	82%

Capital Metro realizes that OTP is a critical measure of the quality and reliability of its services. A task force meets monthly to identify OTP root causes and make the appropriate running time adjustments at each service change.

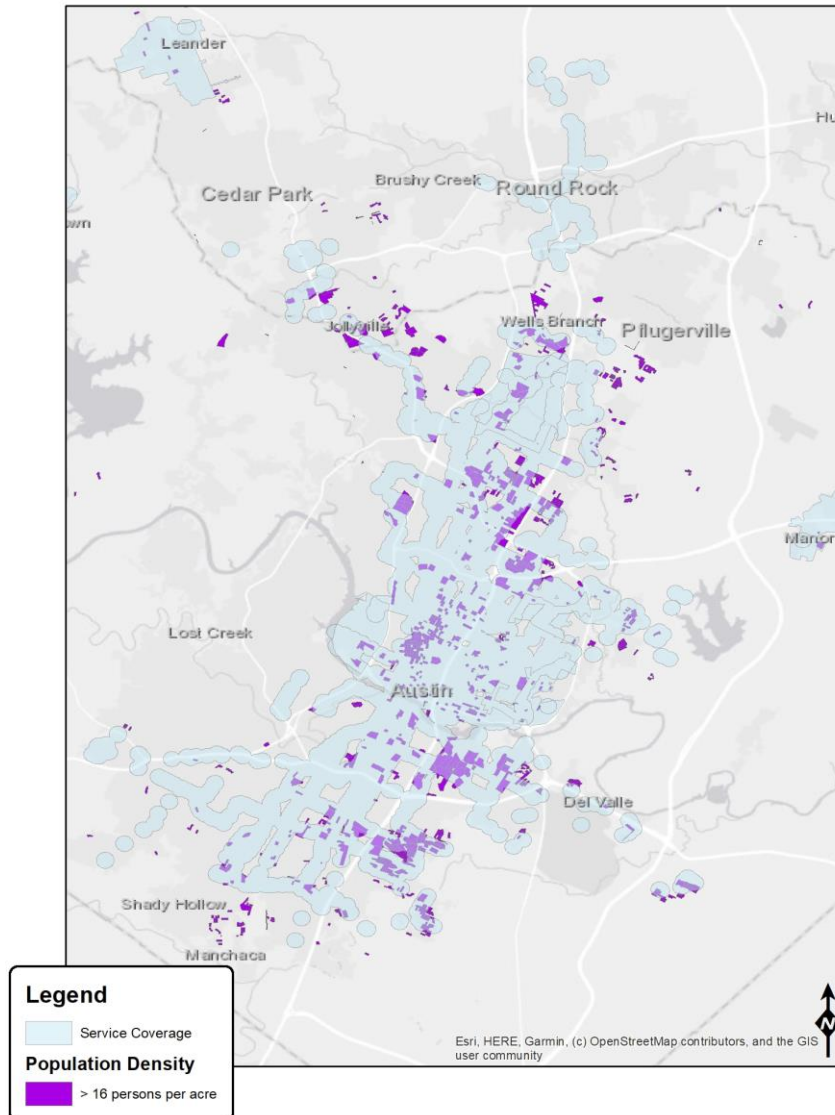
Service Availability

Service availability is a general measure of the distribution of routes within Capital Metro's service area. Capital Metro's guideline is to prioritize service within walking distance (quarter mile) of areas with a residential density of 16 persons per acre. Residential density is a primary influence on transit demand and this guideline reflects industry standards for minimum density needed to support cost-effective transit service.

By creating a quarter mile buffer around every bus stop and then determining the overlap with density of 16 persons per acre, Planning was able to determine that 82% of areas meeting the residential density threshold meet the service availability guideline. This is an increase from 78% in 2018. Most of the increase is the result of the implementation of Pickup service.

Figure 25. Capital Metro Service Area Population Density

Capital Metro Service Coverage



There are two major reasons why more area isn't covered. First, some of the areas are not contiguous; making them difficult to serve effectively. Second, the road network in Capital Metro's service area does not allow transit to access certain areas.

Transit Amenities

Capital Metro has two guidelines to guide the placement of amenities at bus stops:

- Bus stops generating at least 50 daily boardings qualify for a shelter.
- Bus stops generating at least 15 daily boardings qualify for a bench.

Amenities may be placed at locations not meeting these guidelines if the stop is located near:

- Major activity/employment centers.
- Hospitals or social service agencies.
- Apartments with 250+ units.
- Schools.
- Route intersections.
- Service frequency greater than 30 minutes.

Planning analyzed bus stops in minority and non-minority Census block groups to determine the number of stops that meet the guideline. Bus stops in minority Block Groups meet the guidelines for shelters more than stops in non-minority areas.

Table 23. Bus stops and shelters that meet the guidelines

	Benches	Shelters
	Meets Guideline and has a bench	Meets Guideline and has a shelter
Minority	83.6%	76.0%
Non-Minority	84.8%	56.5%

Vehicle Assignment

Vehicle assignments are guided by a memorandum previously reviewed by the FTA (see Attachment A on page 98). Planning compared actual vehicle assignments to recommended assignments for February and observed:

- 3,821 instances of vehicle assignment to minority routes with 681 instances of the wrong vehicle being assigned (17.8%)
- 1,828 instances of vehicle assignment to non-minority routes with 366 instances of the wrong vehicle being assigned (20.0%)
- Minority routes have the correct vehicle assigned more often than non-minority routes.

Summary

Overall, Planning found no disparate impact existing on the basis of race, color, or national origin. The only corrective action that needs to take place is the improvement of on-time performance. The following table summarizes the finding for each standard, guideline or policy that was monitored:

Table 24. Summary of Service Monitoring Results

Standard	Results
Vehicle Load	Neither minority or non-minority routes exceeded service standards
Vehicle Frequency	Neither minority or non-minority routes exceeded service standards
On-Time Performance	Both Minority & non-minority routes failed to meet the standard
Service Availability	82% of area within service area meets the guideline
Transit Amenities	Bus stops in minority Block Groups meet the guidelines for shelters more than stops in non-minority areas
Vehicle Assignments	Minority routes have the correct vehicle assigned more often than non-minority routes.

The next time a service monitoring will take place is when ridership recovers to 80% to pre-COVID levels.

IV. Appendices



A. BOARD RESOLUTION APPROVING THE TITLE VI POLICIES, SERVICE MONITORING RESULTS, AND 2021 TITLE VI PROGRAM COMPLIANCE REPORT

[INSERT SIGNED RESOLUTION]

B. ORIGINS AND DESTINATION SURVEY IN SPANISH

CCR #10-6527

1/29/15

Draft # 2

Ruta #:	Dirección	Fecha:	Hora:
Bloque #:	NB () EB () IB () CW ()	Entrevista #:	
	SB () WB () OB () CCW ()	Entrevistador #:	

ENCUESTA DE INTERCEPCION DE AUTOBUS/TREN

CUENTE CADA CUARTA PERSONA EN EL AUTOBUS/TREN Y PIDA ENTREVISTAR A LA PERSONA.

Hola, me llamo _____y me ha contratado Capital Metro para llevar a cabo una breve entrevista acerca de su experiencia utilizando el transporte de (autobús/tren). Esta encuesta asistirá a Capital Metro a mejorar los servicios existentes y sólo llevará unos cinco minutos. Sabemos que su tiempo es valioso así que como agradecimiento, si completa esta entrevista y nos provee su nombre y número de teléfono o dirección de email, añadiremos su nombre a un concurso para ganar un pase mensual. Si ya viaja gratis, puede darle el pase a un familiar o amigo.

S1. ¿Ha participado en una encuesta cuando viajaba en autobús o tren para Capital Metro en los pasados 3 meses?

- () Sí - **De Gracias y Termine**
 () No - Continúe

a. ¿Preferiría continuar esta encuesta en inglés o en español?

- () Inglés () Español

1. ¿Qué edad tiene? _____ años (Si <16, De Gracias y Termine)

2. ¿Dónde se SUBIO a este (Bus/Tren)? (Número de Parada de la lista)

Parada # _____

3. ¿De dónde viene?

- () Casa () Compras (Comestibles)
 () Trabajo () Compras (Otro)

- () Médico () Universidad (que no sea
Universidad de Texas)
- () Personal/Recreacional () La Universidad de Texas
- () Escuela (Escuela Primaria/Secundaria/Preparatoria) () Aeropuerto
- () Otro (especifique)_____

4. ¿Cuál es la dirección **O** la intersección más cercana del lugar donde comenzó su viaje hoy?
**(Por favor especifique el tipo de calle por su nombre en inglés, "street", "lane", "road",
etc... y si se aplica, este, oeste, norte o sur)**

Dirección

Número de Cuadra Nombre de Calle

Intersección más cercana_____y

Nombre de primera calle Nombre de segunda calle

SI EL RESPONDIENTE NO PUEDE PROPORCIONAR LA DIRECCION, TRAS INDAGAR,
PREGUNTE:

¿Cuál es el punto de referencia o edificio más cercano desde el lugar de donde comenzó hoy
su viaje?

5. ¿Cómo llegó a la PARADA de (Bus/Tren)?

- () Transbordo de Autobús/Tren de la Ruta #:_____. ¿Cuántas cuadras
caminó desde este autobús/tren a éste? _____ (0 ó más)
- () Me llevó o me recogerá alguien en carro – manejaremos _____ millas.
- () Manejé mi carro _____ millas.
- () Caminé _____ cuadras (0 ó más).
- () Monté en bici _____ millas.
- () Otro (especifique) _____

6. ¿Cómo piensa llegar de este (Bus/Tren) a su destino final?

- () Haré un transbordo al Autobús/Tren de la Ruta #:_____. ¿Cuántas cuadras
caminó desde este autobús/tren a éste? _____ (0 ó más)
- () Me llevará o recogerá alguien en carro – manejaremos _____ millas.
- () Manejaré un carro _____ millas.
- () Caminaré _____ cuadras (0 ó más).

- () Montaré en bici _____ millas.
 () Otro (especifique) _____

7. ¿A dónde va?

- () Casa () Compras (Comestibles)
 () Trabajo () Compras (Otro)
 () Médico () Universidad (que no sea
 Universidad de Texas)
 () Personal/Recreacional () La Universidad de Texas
 () Escuela (Escuela Primaria/Secundaria/Preparatoria) () Aeropuerto
 () Otro (especifique) _____

8. ¿Cuál es la dirección **O** la intersección más cercana de su destino final? **(Por favor especifique el tipo de calle por su nombre en inglés, "street", "lane", "road", etc... y si se aplica, este, oeste, norte o sur)**

Dirección

 Número de Cuadra Nombre de Calle

Intersección más cercana _____ y

 Nombre de primera calle Nombre de segunda calle

SI EL RESPONDIENTE NO PUEDE PROPORCIONAR LA DIRECCION, TRAS INDAGAR, PREGUNTE:

¿Cuál es el punto de referencia o edificio más cercano desde el lugar de donde comenzó hoy su viaje?

9. ¿Cómo pagó para subirse a este (Bus/Tren)? **(ENTREGUE AL RESPONDIENTE TARJETA)**

- () Pasaje sencillo (en efectivo)
 () Pasaje sencillo de Tarifa Reducida (en efectivo)
 () Pase de Un día (en efectivo)
 () Pase de Un día de Tarifa Reducida (en efectivo)
 () Pase de 7 Días
 () Pase de 31 Días

- ☐ Pase de 31 Días de Tarifa Reducida
☐ Business Pass (COA, ACC, Condado de Travis)
☐ MetroAccess
☐ Tarjeta de Identificación de UT
☐ Familiar dependiente de un empleado
☐ Gratis
☐ Otro, especifique _____
10. ¿Utilizó una aplicación de su celular para comprar su pase? ☐ Sí ☐ No
11. Qué categoría de pasaje pagó
- | | |
|---------------------------------------|--|
| <input type="checkbox"/> Adulto | <input type="checkbox"/> Niño |
| <input type="checkbox"/> Tercera Edad | <input type="checkbox"/> Discapacitado |
| <input type="checkbox"/> Estudiante | |
- [Q12-Q14 PREGUNTE SOLO SI RUTA = 550(MetroRail), 801(MetroRapid), y 803(MetroRapid)]
12. ¿Cuánto tiempo ha utilizado el servicio de (MetroRapid/MetroRail)?
- ☐ Menos de 1 mes
☐ 2-4 meses
☐ 4-6 meses
☐ 6-12 meses
☐ 1-2 años
☐ 2-3 años
☐ 4-5 años
☐ Esta es mi primera vez
13. Antes de que empezara a usar el (MetroRail/MetroRapid), ¿qué método de transporte usaba para llegar a su destino actual?
- ☐ Usaba MetroBus
☐ Iba en carro con alguien o me recogían
☐ Manejaba mi carro
☐ Caminaba
☐ Montaba en bici
☐ Ninguno, siempre he usado el MetroRail/MetroRapid para este destino
☐ Otro (especifique) _____
14. ¿Qué fue lo que le hizo decidir usar este servicio en vez de su anterior método de transporte (**marque todos los que se apliquen**)?
- ☐ Llegar más rápido a mi destino
☐ Más fiable
☐ Mayor frecuencia de servicio

- ☐ Wi-Fi
☐ Capacidad de portar bicicletas
☐ Información en tiempo real
☐ Línea/estación dedicada
☐ Ayuda al medioambiente
☐ Ayuda a bajar el coste de transporte
☐ Mejorar saludablemente/mentalmente
☐ Otro (especifique) _____
15. ¿Cuántos carros, trocas, o furgonetas que funcionen están disponibles para su uso en su hogar?
- ☐ Cero ☐ Uno ☐ Dos ☐ Tres o más
16. ¿Podría haber usado uno de esos vehículos para **ESTE VIAJE** en vez de usar el autobús?
- ☐ Sí
☐ No
17. ¿Cuánta gente reside en su hogar? (Familia y miembros que no sean de la familia)
- ☐ Una ☐ Dos ☐ Tres ☐ Cuatro ☐ Cinco ☐ Seis ☐ Siete o más
18. (RAZA/ETNIA) ¿Es usted...?
- ☐ Blanco(a)/Anglo ☐ Afroamericano(a) ☐ Hispano(a)/Latino(a)
☐ Asiático(a) ☐ Nativo-americano(a) ☐ Otro _____
 (especifique)
19. ¿En qué idioma se prefiere hablar en su casa?
- ☐ Inglés ☐ Español ☐ Chino mandarín
☐ Vietnamita ☐ Otro (especifique) _____
20. POR OBSERVACION: SEXO
- ☐ Hombre
☐ Mujer

(ENTREGUE AL RESPONDIENTE LA TARJETA A)

21. Por favor lea la letra en esta tarjeta que represente mejor el ingreso anual total combinado de usted y todos los miembros de su hogar (incluyendo miembros que no sean familia que viven en su hogar).

A	\$0 - \$4,999	E	\$20,000 - \$24,999	I	\$60,000 - \$69,999
B	\$5,000 - \$9,999	F	\$25,000 - \$29,999	J	\$70,000 - \$79,999
C	\$10,000 - \$14,999	G	\$30,000 - \$39,999	K	\$80,000 - \$100,000
D	\$15,000 - \$19,999	H	\$40,000 - \$59,999	L	Más de \$100,000

SI REHUSO --- ¿El ingreso anual de su hogar está por encima o por debajo de \$20,000?

() Por encima de \$20,000 () Por debajo de \$20,000 () Rehusó

22. ¿Con qué frecuencia utiliza Capital Metro?

- | | |
|--------------------------|----------------------------|
| () 6-7 días a la semana | () 1-2 días al mes |
| () 5 días a la semana | () Menos de 1 día al mes |
| () 3-4 días a la semana | () Esta es mi primera vez |
| () 1-2 días a la semana | |

23. ¿Cuánto tiempo ha vivido en el área de Austin?

- | | |
|--------------------|------------------|
| () Menos de 1 año | () 4-5 años |
| () 1-2 años | () 5-6 años |
| () 2-3 años | () 6-7 años |
| () 3-4 años | () 7 o más años |

Gracias por su tiempo. Para poder incluirle en un concurso para ganar un pase mensual o anual, ¿me podría dar su nombre y número de teléfono?

Nombre _____

Teléfono: _____

ARJETA A

- | | |
|---|---------------------|
| A | 0 - \$4,999 |
| B | \$5,000 - \$9,999 |
| C | \$10,000 - \$14,999 |
| D | \$15,000 - \$19,999 |
| E | \$20,000 - \$24,999 |
| F | \$25,000 - \$29,999 |

G	\$30,000 - \$39,999
H	\$40,000 - \$59,999
I	\$60,000 - \$69,999
J	\$70,000 - \$79,999
K	\$80,000 – 100,000
L	Más de \$100,00

Capital Metro's Language Assistance Plan **2021**

A Resource Manual for Limited English Proficiency



Attachment: Capital Metro's LAP (4889 : Approval of Title VI Policy Revisions)

Language Assistance Plan for Limited English Proficient Populations

Final

June 10, 2021

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Appendix A: LEP Public Involvement Summary

1. Introduction

The following document serves as the Title VI Language Assistance Plan (LAP) for Limited English Proficient (LEP) Populations for Capital Metro Transportation Authority (Capital Metro) and demonstrates the Agency's commitment to provide meaningful access to all individuals accessing services provided by the Agency. The plan is intended for managers and staff who interact directly or indirectly with LEP individuals. Title VI prohibits discrimination by recipients of Federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for Limited English Proficient people. As a sub-recipient of Federal funds, Capital Metro must "take reasonable steps to ensure meaningful access to their programs and activities by LEP persons."¹

On August 11, 2000, President William Jefferson Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" that requires Federal agencies and recipients of Federal funds to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those needed services so that LEP persons can have meaningful access to them. Further guidance was provided in 2012 with the release of the Federal Transit Administration's (FTA) circular FTA C 4702.1B that further codified the FTA's objective to "promote full and fair participation in public transportation decision-making without regard to race, color, or national origin; and ensure meaningful access to transit-related programs and activities by persons with limited English proficiency."²

As a means of ensuring this access, the FTA Office of Civil Rights has created a handbook³ for public transportation agencies that provides step-by-step instructions for conducting the required LEP needs assessment and developing a LAP. The LAP becomes a blueprint for ensuring that language does not present a barrier to access to the agency's programs and activities.

To develop the LAP necessary to comply with the guidance, an individualized agency assessment is required that balances the following four factors:

- Factor 1: The number or proportion of LEP persons eligible to be served or likely to encounter a program, activity, or service of the recipient or grantee;
- Factor 2: The frequency with which LEP individuals come in contact with the program;
- Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives; and
- Factor 4: The resources available to the recipient and costs for language services.

To ensure compliance with federal guidance, Capital Metro undertook an assessment with the goal that all reasonable efforts be made to ensure that customers are not denied access to their services due to a limited

¹ Federal Register Volume 70, Number 239 (Wednesday, December 14, 2005)

² FTA Circular 4702.1B- TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS, October 1, 2012.

³ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers. The Federal Transit Administration Office of Civil Rights, April 13, 2007

ability to speak, read, write or understand English. Capital Metro believes in the rights of all residents within its community, and furthermore supports the overriding goal of providing meaningful access to its services to LEP persons. Given the diverse nature of the service area, eliminating the barrier to persons with limited English-speaking ability will have a positive impact not only on LEP individuals themselves, but also on the impact that Capital Metro services have on the community.

Agency Background

In January 1985, voters approved the creation of Capital Metro as the entity to provide mass transportation service to the greater Austin metropolitan area by agreeing to fund part of the organization with a one percent sales tax levied by members of its service area. The Capital Metro service area is located in Travis and Williamson Counties and includes the cities of Austin, Jonestown, Lago Vista, Leander, Manor, Point Venture, San Leanna, Volente, the Anderson Mill area in Williamson County and Precinct 2 (an unincorporated area in north Travis County). The Cities of Round Rock, Pflugerville and Georgetown do not pay the one percent sales tax and currently contract for Capital Metro service.

The service area is approximately 544 square miles and serves a population of over 1,300,000. The regional transit system carries over 31 million passengers per year and provides bus service, a commuter rail system and paratransit services⁴. Capital Metro provides the following services:

- Bus service that includes frequent service with a limited number of stops and faster travel times, commuter rail service to and from downtown, and a shuttle system that provides access to the University of Texas campus.
- Americans with Disabilities Act (ADA) paratransit service (MetroAccess) for those who are unable to use bus and rail services.
- On-demand shared ride service (Pickup) that can accommodate customers in a wheelchair.
- Vanpool service (MetroRideShare) for a group of 4 or more people who regularly travel together in a rideshare vehicle for the purpose of commuting to and from work.
- Fixed-route bus service, non-emergency medical transportation, and other services of varying frequency to riders who live outside of the Capital Metro service area that covers a 7,200 square mile area surrounding Austin. Capital Metro partners with Capital Area Rural Transportation System (CARTS) to support these services.
- Guaranteed Ride Home that provides registered customers with a taxi ride home in the event of an unexpected emergency from work.
- Bike rental and secure bike parking for bicycles (MetroBike) is designed for those trips that are too far to walk but too short to drive.

Cap Metro has 83 standard bus routes, 14 high-frequency routes, 368 MetroBuses, 12 E-Buses, 55 MetroRapid vehicles, 10 diesel electric trains, 257 vanpools, and 213 paratransit vehicles.

Methodology and Recommendations

The development of the LAP and associated Four Factor Analysis included the following components:

1. Research of peer agencies
2. Data analysis
3. Surveys and Community Based Organization (CBO) participation

⁴ Fast Facts on Capital Metro website at <https://www.capmetro.org/facts>

4. Capital Metro staff interviews
5. General plan findings that include the Four Factor Findings and Top Languages and Safe Harbor languages

Based on the Four Factor Findings, the following are categories of recommendations that would improve the level of service that Capital Metro provides to its LEP customers and that can be implemented over time as budget and staff permits:

1. General, including such things as internal awareness and public outreach strategy
2. Materials and Documents
3. Translation and Interpretation Tools and Protocols
4. Employees, including training or incentives to empower employees to provide assistance

2. Four Factor Analysis Overview

The cornerstone of the LAP is the Four Factor Analysis that serves as a needs assessment for developing language assistance measures for those with a limited ability to read, write, speak or understand English. These LEP populations are those who reported to the U.S. Census that they speak English “less than very well,” “not well,” or “not at all.” It’s important to note that LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information (trip planning needs, origin and destination needs) in English.

The FTA circular FTA C 4702.1B provides guidance to recipients on how to ensure that they provide meaningful access to persons who are LEP. The guidance notes that recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. The analysis can help Capital Metro determine if it communicates effectively with LEP persons and will inform the development of the LAP.

The Four Factor Analysis is an individualized agency assessment that balances the following four factors: 1) determining the number or proportion of LEP persons in the service area who may be served or are likely to encounter a Capital Metro program, activity or service; 2) the frequency with which LEP Populations come in contact with Capital Metro’s programs, activities and services; 3) the nature and importance of the program, activity, or service provided by the recipient to people’s lives; and 4) the resources available to Capital Metro and costs associated with language assistance services. This section describes the step-by-step instructions for conducting the required LEP needs assessment according to the FTA’s handbook as it applies to Capital Metro.

2.1 Data Sources and Use

A variety of data sources were consulted for each of the steps in the Four Factor Analysis. This section presents a description of each of the data sources and what they were used for in the analysis.

Data that were consulted to determine the most prevalent languages spoken in the service area, as well as those that may benefit from language assistance for the Factor 1 analysis included:

- American Community Survey (ACS) 2018 one-year sample languages of people that speak English less than “Very Well” for Travis County, Table B16001
- ACS 2015 five-year sample of languages of people that speak English less than “very well” for Williamson County, Table B16001

- ACS 2019 one-year sample of LEP Households, Table S1602
- Austin Independent School District English Language Learner Data (Bilingual and English as a Second Language Programs and Demographic Summary Report 2019-2020, Austin Independent School District)
- Capital Metro Customer Service Information

Because the service area includes both portions of Travis and Williamson County, the data includes different data years by county, as the most recent available data for Williamson County is from 2015. Each county is displayed independently so that the differences can be compared. Had 2018 data been available for both counties, a cumulative display could be presented. However, the data is separated for accuracy.

The data that were consulted for Factors 2 and 3 (the frequency with which LEP Populations come in contact with Capital Metro's programs activities and services, and the nature and importance of the program, activity, or service provided by Capital Metro to people's lives) included:

- Employee/contractor surveys
- Language Line telephone data
- On board surveys (if applicable, so may not be available)
- CBO consultation/survey data
- Employee/contractor interviews
- ACS 2019 one-year sample of commuting characteristics for Travis and Williamson counties, Table S0801

Data that were consulted for Factor 4 to determine the resources available to Capital Metro and costs associated with language assistance services included:

- Department budgets for translation and interpretation expenses
- Language Line telephone data costs
- Document translation services costs

2.2 Factor 1 Overview

Factor 1 includes determining the number or proportion of LEP persons in the service area who may be served or are likely to encounter a Capital Metro program, activity or service.

The first step in the LAP development process is to quantify the number of persons in the service area who do not speak English fluently and would benefit from language assistance. This process includes examining the agency's prior experience with LEP populations, and using census and other available data to identify concentrations of LEP persons in the service area, including those that qualify under the "Safe Harbor Languages" definition.

Safe Harbor languages are defined by the Circular as languages spoken by at least 1,000 individuals with LEP within the service area, stating, "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."

To determine Safe Harbor languages in the Capital Metro service area, the most recent available ACS data was used from Travis County and Williamson County as described above. While the data is not as

contemporary as desired, it represents the most recent data available with the granularity necessary to review the specific languages for consideration.

The 2019-2020 Austin Independent School District's Language Learner data also provided corroborating data to support the findings.

2.2.1 Data Analysis

Linguistic Isolation

The first data reviewed related to the percentage of limited English-speaking households within the two counties in which no member 14 years or older (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and older have at least some difficulty with English.⁵ Previous Census Bureau data products have referred to these households as "linguistically isolated."

About 6% of all Travis County households would be considered LEP households, while about 3% of Williamson County households would fall into that category (see **Table 1: Linguistic Isolation for Households in Travis and Williamson Counties**). Similar differences in the two counties reveal that of the total Spanish-speaking households in Travis County, about 20% of those are LEP households, or linguistically isolated. This compares to about 11% of the Williamson county Spanish-speaking households.

What is notable is that the percentage of households that speak Asian and Pacific Island languages and are LEP are also about 20% of the total in Travis County. However, in Williamson County, the percentage of Asian language speaking households is almost double that of Spanish speaking households at almost 19%.

Table 1: Linguistic Isolation for Households in Travis and Williamson Counties

	Travis County, Texas			Williamson County, Texas		
	Total Households	Limited English-speaking households	Percent limited English-speaking households	Total Households	Limited English-speaking households	Percent limited English-speaking households
All households	472,361	28,409	6.00%	180,160	5,279	2.90%
Households speaking--						
Spanish	104,174	21,809	20.90%	28,132	3,007	10.70%
Other Indo-European languages	18,782	1,601	8.50%	7,885	677	8.60%
Asian and Pacific Island languages	19,541	3,923	20.10%	7,905	1,462	18.50%
Other languages	5,524	1,076	19.50%	1,285	133	10.40%

Source: ACS, 2019 one-year sample Table S1602.

⁵ ACS 2019 one-year sample Table S1602 Table Notes

While this data presents the broad language categories of those LEP households, it is necessary to review other census data tables to determine the languages of the LEP population. The most current ACS data was reviewed for this analysis, which includes Table B16001, that presents the population's ability to speak English.

ACS Safe Harbor Languages

The Safe Harbor language determination began with a review of the 2018 ACS one-year sample data, Table B16001 for Travis County and the 2015 ACS five-year sample data, and Table B16001 for Williamson County. As previously mentioned, it was necessary to consult two different sample years for the analysis, as the most current data for Williamson County was 2015. As a result, these two counties are presented independently, as shown in **Table 2: Travis County LEP Population (ACS 2018 1-Year Sample)** and **Table 3: Williamson County LEP Population (2015 ACS 5-Year Sample)** below. However, comparisons for languages that may have been under the 1,000 or the 5% threshold in one county were compared to the same language in the other county to see if the threshold could be reached. This data, below, is slightly different than the "Linguistic Isolation" table, above, as that data considers only those 14 years of age and older.

Seven unique Safe Harbor languages meeting the 1,000 or 5% threshold were identified using the 2018 and 2015 ACS data:

1. Spanish
2. Punjabi
3. Telegu
4. Chinese
5. Korean
6. Vietnamese
7. Arabic

English-only is still spoken by the majority of the population in the service area, with about 70% in Travis County and 80% in Williamson County. Spanish, by a large margin, continues to be the most prevalent LEP language in the service area, at 29% of the LEP population in Travis County and 24% of the LEP population in Williamson County. However, while Spanish is the most prevalent LEP population, this only accounts for about 9% of the entire population in Travis County and 5% in Williamson County.

Several other language groups also met the threshold but were in groups of languages rather than in discrete, unique languages. For example, over 1,100 residents indicated they spoke English less than "very well" in the Nepali, Marathi or other Indic languages (languages of India). However, that group includes greater than 10 common languages, including Hindi. As a result, while specific languages within the group are not included in the Safe Harbor list, there may a need to investigate whether there are unmet needs within this or other of these language groups that may result in some languages being included for written translations. This will be further discussed in Factors 2 and 3.

One language, Punjabi, was included as a Safe Harbor language even through it did not meet the 1,000 or 5% threshold due to the close proximity to meeting this threshold. At 997 respondents who indicated they spoke English less than "very well," it was included. Should new data be available in the next LAP update, it can be reviewed for relevance at that time.

Table 2: Travis County LEP Population (ACS 2018 1-Year Sample)

Travis County LEP Population			
Languages	Population	Percent of Total	Percent of LEP
Total:	1,170,348		
Speak only English	806,078	68.88%	
Spanish:	265,593		
Speak English "very well"	159,876		
Speak English less than "very well"	105,717	9.03%	29.02%
Punjabi:	1,164		
Speak English "very well"	167		
Speak English less than "very well"	997	0.09%	0.27%
Nepali, Marathi, or other Indic languages:	2,894		
Speak English "very well"	1,754		
Speak English less than "very well"	1,140	0.10%	0.31%
Other Indo-European languages:	2,209		
Speak English "very well"	1,076		
Speak English less than "very well"	1,133	0.10%	0.31%
Telugu:	4,602		
Speak English "very well"	3,433		
Speak English less than "very well"	1,169	0.10%	0.32%
Chinese (incl. Mandarin, Cantonese):	12,584		
Speak English "very well"	8,605		
Speak English less than "very well"	3,979	0.34%	1.09%
Korean:	3,422		
Speak English "very well"	1,863		
Speak English less than "very well"	1,559	0.13%	0.43%
Vietnamese:	9,956		
Speak English "very well"	5,080		
Speak English less than "very well"	4,876	0.42%	1.34%
Arabic:	7,782		
Speak English "very well"	5,504		
Arabic Speak English less than "very well"	2,278	0.19%	0.63%
Yoruba, Twi, Igbo, or other languages of Western Africa:	3,041		
Speak English "very well"	2,005		
Speak English less than "very well"	1,036	0.09%	0.28%
Swahili or other languages of Central, Eastern, and Southern Africa:	2,171		
Speak English "very well"	1,132		
Speak English less than "very well"	1,039	0.09%	0.29%

Source: ACS, 2018 one-year sample Table B16001.

Table 2: Travis County LEP Population (ACS 2018 1-Year Sample) presents the Travis County LEP population and **Table 3: Williamson County LEP Population (2015 ACS 5-Year Sample)** presents the Williamson County LEP population.

Table 3: Williamson County LEP Population (2015 ACS 5-Year Sample)

Williamson County LEP Population			
Languages	Population	Percent of Total	Percent of LEP
Total:	440,120		
Speak only English	349,018	79.3%	
Spanish or Spanish Creole:	64,037		
Speak English "very well"	42,227		
Speak English less than "very well"	21,810	5.0%	23.9%
Chinese:	3,226		
Speak English "very well"	1,858		
Speak English less than "very well"	1,368	0.3%	1.5%
Korean:	1,398		
Speak English "very well"	626		
Speak English less than "very well"	772	0.2%	0.8%
Vietnamese:	2,411		
Speak English "very well"	1,203		
Speak English less than "very well"	1,208	0.3%	1.3%
Arabic:	577		
Speak English "very well"	414		
Speak English less than "very well"	163	0.0%	0.2%

Source: ACS, 2015 one-year sample Table B16001.

According to the guidelines set forth by the FTA, the LEP analysis should also review alternate and local sources of data to assist in Factor 1 findings. To provide further understanding of the languages that may require language assistance, the Austin Independent School District data on bilingual and English language learners was reviewed. The English Learner survey does not provide the most useful data for the LEP analysis, as it is collected among students and not the population as a whole. However, it provides another means of cross-checking census data analyses. As anticipated, Spanish remains the top language spoken by language-learners at 92% of the language learners. While this list does not present any unique observations, it does provide more clarity on several findings:

- 1) Mandarin is the Chinese language most spoken by language learners, which is not specified in the ACS data
- 2) Several of the languages coincide with the ACS data and corroborate the findings, including Spanish, Arabic, Vietnamese, Korean, and Telugu.
- 3) Several other languages are not represented in the ACS data but may require further evaluation to determine if they should be considered languages requiring written translations, including Burmese, Pashto, Hindi, French or Tamil.

Table 4: Austin Independent School District Language Learner Data 2019 provides a breakdown of the primary languages of the Austin Independent School District English Learners reported for the school district.

Table 4: Austin Independent School District Language Learner Data 2019

2019 Austin Independent School District English Learner Data				
Number	Languages	Number of Learners	% of LEP	Rank
1	Spanish	19,876	92.3%	1
2	Arabic	415	1.9%	2
3	Vietnamese	296	1.4%	3
4	Pashto	217	1.0%	4
5	Mandarin	146	0.7%	5
6	Burmese	122	0.6%	6
7	Korean	121	0.6%	7
8	Telugu	102	0.5%	8
9	Hindi	89	0.4%	9
10	French	74	0.3%	10
11	Tamil	74	0.3%	11

Source: Bilingual and English as a Second Language Programs and Demographic Summary Report 2019-2020, Austin Independent School District

Using a compound analysis of the three data sources, we find that all of the most prevalent languages are represented in the data. **Table 5: Composite of LEP Languages** presents the ranking of the three data sets that were used to help identify the Safe Harbor languages. Based on Factors 2 and 3, additional languages may be added to reflect the better understanding of the service area's language needs.

Table 5: Composite of LEP Languages

Language	Travis County ACS Ranking	Williamson County ACS Ranking	AISD Learner Ranking
Spanish	1	1	1
Vietnamese	2	3	3
Chinese (Mandarin)	3	2	5
Arabic	4	5	2
Korean	5	4	7
Telugu	6	N/A	8
Pashto	N/A	N/A	4
Punjabi	7	N/A	N/A
Burmese	N/A	N/A	6
Hindi	N/A	N/A	9
French	N/A	N/A	10
Tamil	N/A	N/A	11

Sources: ACS, 2019 one-year sample Table S1602; Source: ACS, 2018 one-year sample Table B16001; and Bilingual and English as a Second Language Programs and Demographic Summary Report 2019-2020, Austin Independent School District.

Past Practice

In the past several years, the Community Advancement Network (CAN) in Austin has provided guidance to Capital Metro on ways to enhance their language assistance measures to refugee and immigrant populations in the area. CAN is a partnership of government, non-profit, private and faith-based organizations who work together to enhance the social, health, educational and economic well-being of Central Texas. CAN provides

a collaborative forum to enhance awareness of issues, strengthen partnerships, connect efforts across issue areas, and facilitate development of collaborative strategies.

CAN alerted Capital Metro staff to the language assistance needs of several immigrant and refugee populations that have been underrepresented in census data, but whose language assistance needs may represent a barrier to using Capital Metro's service. The languages include French, which is used by a number of countries including Haiti and a variety of African counties; Burmese which is spoken in Myanmar; and Pashto, which is spoken in Afghanistan and parts of Pakistan. Capital Metro and other agencies in Central Texas have provided targeted translations to these languages.

As a result of this past practice, French, Burmese and Pashto will be added to the list of Safe Harbor languages.

2.2.2 Factor 1 Findings

As a result of the Factor 1 analysis, the following languages should be included in Capital Metro's LAP :

- Primary: Spanish represents the language spoken in the heaviest concentration within the service area
- Safe Harbor languages:
 - i. Arabic,
 - ii. Burmese,
 - iii. Chinese (Mandarin),
 - iv. French,
 - v. Korean,
 - vi. Pashto,
 - vii. Punjabi,
 - viii. Telugu, and
 - ix. Vietnamese.

2.3 Factor 2 Overview

Factor 2 includes the frequency with which LEP Populations come in contact with Capital Metro's programs activities and services. This factor can also influence the languages that are included in the LAP, as some language groups may require language assistance even though they are not identified by data.

Assessing the frequency with which LEP populations come in contact with Capital Metro's programs, activities and service helps the agency determine which languages need to be considered for language services. Generally, "the more frequent the contact, the more likely enhanced language services will be needed."⁶ Strategies that help serve an LEP person on a one-time basis will be very different than those that may serve LEP persons on a daily basis. This analysis provides more clarity on the languages encountered and can help refine the languages requiring language assistance. This can also include adding languages for potential language assistance based on the agency employee's interaction with specific language populations.

For purposes of estimating the frequency of contact with LEP individuals, Capital Metro programs and services were reviewed, and front-line employees that have direct connection with LEP populations were surveyed and/or interviewed. Surveys and interviews with CBOs were also reviewed for relevance. Other

⁶ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons--A Handbook for Public Transportation Providers, 2007

data sources were also consulted including ACS data and the Capital Metro Origin and Destination Survey (2015).

Capital Metro Services and Programs

Capital Metro provides a variety of services and programs that were reviewed to better understand the populations that Capital Metro may serve. In addition to bus and light rail transit service, the agency also offers a number of customer-service related programs that assist the community to access their services. This includes, trip-planning, providing information on how to purchase tickets or ride transit, ADA paratransit trip-scheduling, Pickup trip scheduling, lost and found, MetroBike scheduling, planning and marketing their services and general management of the system. **Table 6: Capital Metro Programs and Services** provides an overview of the broad categories of services that Capital Metro provides, along with the activities that may be relevant to LEP populations.

Table 6: Capital Metro Programs and Services

Program	Description of Relevant Activities
General Administration, Planning and Marketing Activities	Includes outreach to communities on new projects or programs, communication with community on important decision-making, safety and security of system, general administration and system management.
Fixed Route Bus and Rail Service	Bus and rail transit service to bus stops and stations within the service area.
Customer Service Activities	Trip Planning, wayfinding, information on fares, schedules and service disruptions, lost and found and other essential information.
MetroAccess	Service provision of demand-responsive ADA paratransit service. Trip scheduling of paratransit trips.
Pickup	App or Phone based general demand responsive service.
MetroRideShare	Vanpool subscription service for a group of 4 or more.
MetroBike	Bike rental and secure bike parking for bicycles.
Guaranteed Ride Home	Provides registered customers with taxi in event of an unexpected emergency.

Source: Capital Metro, 2021.

Capital Metro On-site Language Assistance Services

The majority of the agency-wide language assistance services are accomplished in one of two ways: Staff-derived translations or interpretations, or the telephone Language Line service.

Capital Metro contracts with Language Line phone service for interpretation assistance that can be used by Capital Metro employees that need interpreters for languages for which no Capital Metro staff is available to provide interpretations. Currently, there are multiple Capital Metro Customer Service and Marketing staff that speak Spanish, which can provide direct customer communication if they are available. There are no dedicated staff for this function, as staff fulfills translations and interpretation as part of their general duties. When Capital Metro staff is assisting other calls or is not available, Language Line services provides interpretation.

Customer Service employees are trained on how to handle the Language Line transactions, which require that the customers be placed on hold, then added to a three-way call between the customer, the Customer Service staff and the language line interpreters. If the Customer Service staff can recognize the language, Spanish for example, the Customer Service employee can request that language from Language Line

operators prior to adding the customer to the call. For languages that are not recognized, Language Line staff speak directly with the customer to identify the language.

Both fixed route and paratransit customer service staff use Language Line service. While 65% of ADA trips booked per day are handled by customer service, there are times when Language Line services are required; when Spanish-speaking staff are not available, or when staff does not speak the language requested. The ADA customer service database of riders includes a note related to languages, so even languages that are not common can be addressed in an effective and efficient manner. Spanish speaking customers can also book trips using the automated system. Paratransit eligibility is typically handled by service representatives. However, contractors can provide functional assessments and the contractors are required to have at least one Spanish speaker to address language access.

Marketing and Planning typically provide language assistance when conducting public meetings, including holding meetings in Spanish or having Spanish/English simultaneous interpretation. Many outreach campaigns also include Spanish translations for targeted materials for service changes along with information documents such as the Destinations Schedules Book and MetroAccess Rider Guide. Capital Planning also includes both meetings in Spanish, as well as translated outreach materials in other languages intended to help the community understand the contemplated capital projects and the public's role in decision-making. These efforts include advertising the meetings in foreign language newspapers and social media posts that can be translated within the app.

Information campaigns can also include videos aimed at improving the rider's understanding of the service or program that have been translated into Spanish. There are a number of embedded videos in Spanish on Capital Metro's website, in addition to videos on YouTube that provide Spanish subtitles to a variety of subjects, including Project Connect, safety and other issues. There are also YouTube videos in English that provide Spanish subtitles on basic riding attributes (e.g. fare payment methods).

Spanish translations also are provided on Capital Metro bus stop signs, and occur within the Ticket Vending machines so that Spanish speaking riders can purchase tickets in their preferred language. Real time information signs located at stops and stations also include Spanish translations, as do the automated announcements on-board vehicles and at stations. Currently the Pickup mobile application includes Spanish translation.

Capital Metro Website

While Capital Metro primarily operates fixed route bus and rail service, and federally required complementary paratransit service, it also offers a number of other services that may have unique translation needs that should be considered. As a result, a review of the web-based forms and informational materials posted on the Capital Metro website was undertaken to help establish which documents would need to have appropriate translations.

The Capital Metro website currently uses Google Translate for a variety of languages that have historically been requested. While not as accurate as a translator, Google Translate provides cost effective methods of addressing the immediate needs of LEP populations that speak lightly used languages. It can also be used as a method of translating text in a rough manner that can then be corrected by native speakers, thereby saving time on translations.

The website does have some translation issues that are being corrected. For example, some text or picture buttons that navigate to other areas of the website are in English and are incapable of being translated using Google Translate. Additionally, the Google Translate bar with translatable languages is at the bottom of the

page, requiring users to scroll to the bottom to select the language. Moving the bar to the top and adding in the flag of the predominant country of the language will also help non-English speakers identify and use the translate function. Adding a text block in the mast head of the website that indicates the availability of free translation assistance along with the Customer Service telephone number that can connect to Language Line would provide an alternative to Google Translate and provide additional tools.

Additionally, some programs and some functions of the website have pdf fact sheets or participation guidelines that cannot be translated using the Google Translate function and would take multiple steps to translate with other third-party applications. One example is the “Report a Problem” and “Customer Contact Form”, which does not translate even after the user has selected a language. This is especially problematic, as customers may wish to report a Title VI complaint, but would be unable to unless they had additional assistance.

Another example is the MetroBike Shelter program, whose participation form does not translate using Google Transit. Similar issues exist with the Guaranteed Ride Home program in which pdfs related to how to register are not translated. As Capital Metro moves ahead with additional ground-breaking services, ensuring that all website applications and forms can be translated using Google Translate will help ensure that LEP populations have access to all of the Capital Metro services.

Frontline Staff Consultation

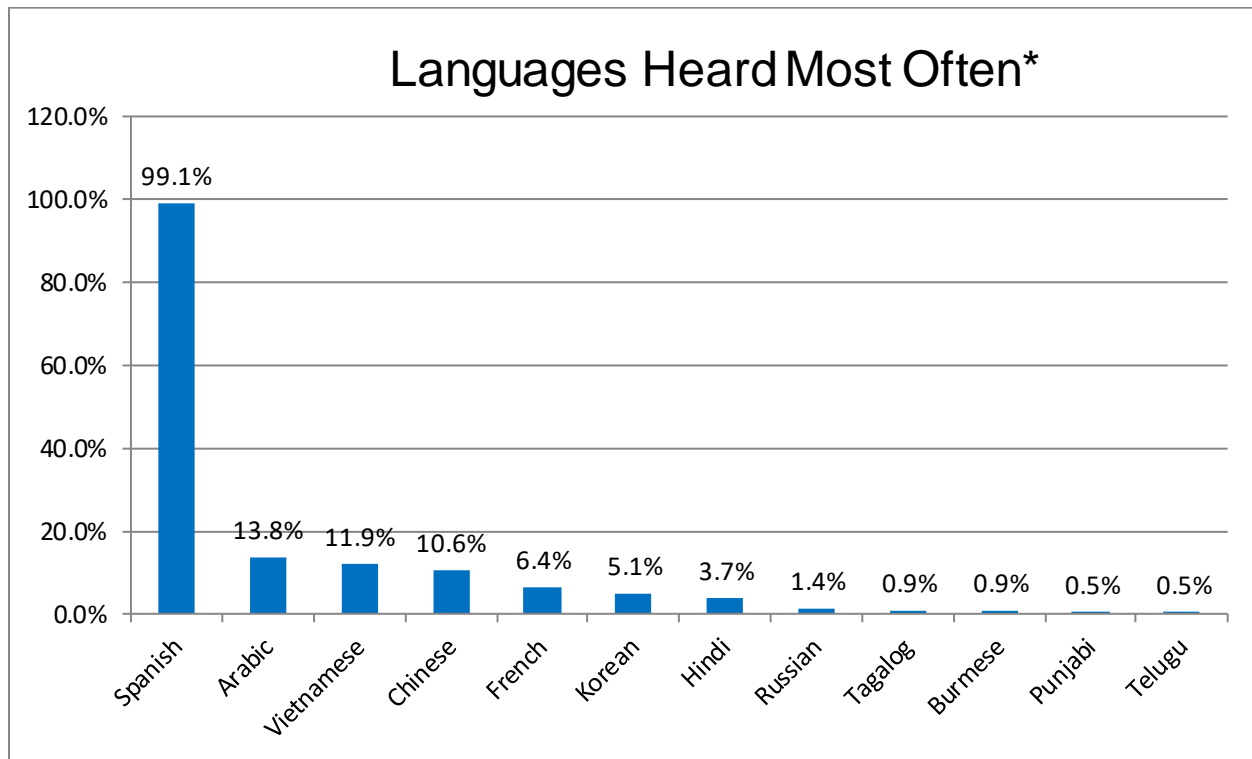
To better understand the languages that are most encountered by Capital Metro staff, both surveys and interviews were conducted. These surveys provided some broad understanding of the frequency of contact, while the interviews provided an in-depth look at the practices of those encountered and the language needs of the rider population and broader community. In addition to asking questions about language interactions and requests, the survey asked questions on methods that could improve Capital Metro’s outreach and communication to LEP communities.

The employee survey was posted online via SurveyMonkey.com to ensure that all employees would be able to participate. Capital Metro publicized and distributed the survey to Capital Metro staff, Austin Transit Partnership, contracted service providers and consultants. Capital Metro staff received the internal survey through an email and had verbal reminders during their team meetings. Contracted service providers received the internal survey via email, distributed via operator mailboxes, social media platforms, and via text. Promotional material was also available on the Timepoint TV which is a display of current bus operations located in the driver ready room. The full survey results are included in **Appendix A: LEP Public Involvement Summary**.

Approximately 229 surveys were conducted, representing about 10% of the employees surveyed. However, the departments having the most direct communication with the public had much better response rates, including 100% for customer service and community engagement employees. Even bus and rail operators supplied responses and comments, which is often hard to achieve for “in the field” employees.

The survey results found that Spanish was the predominant language most often heard when interacting with the customers or members of the public. This corresponds to the ACS data and on-board survey data discussed in Factor 1. Other languages from Factor 1 are also heard in significant numbers, including Chinese, Vietnamese, Korean, Punjabi, Telugu, Arabic, Hindi, French and Burmese. **Figure 1: Languages Most Often Heard** provides the survey results for the languages heard most often by frontline customers.

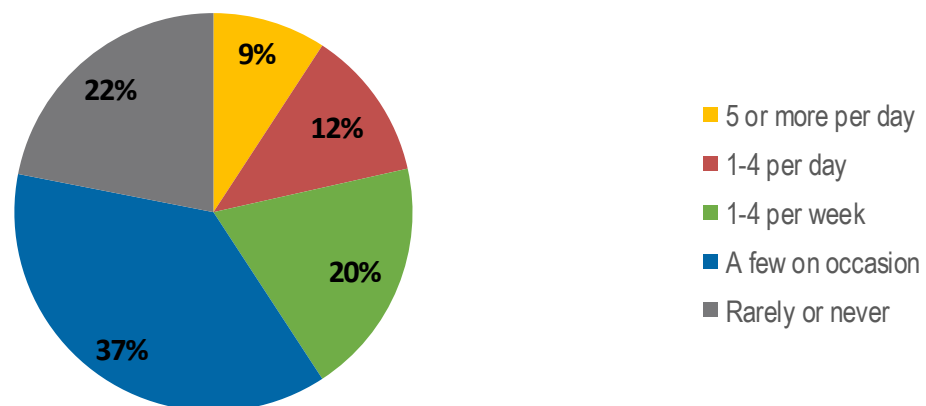
Figure 1: Languages Most Often Heard



Note: Does not add to 100%, as respondents could choose as many as applied.
Source: Language Assistance Plan Agency Survey Results, 2021.

About 21% of the survey respondents indicate that they encounter LEP customers fairly frequently (between 1-4 per day, and 5 or more per day). However, the survey results show that a significant percentage (59%) of respondents rarely or never encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in in English. About 20% indicate that they encounter LEP customers about 1-4 per week. **Figure 2: Frequency of LEP Customer Encounters** presents the frequency of contact with LEP customers.

Figure 2: Frequency of LEP Customer Encounters

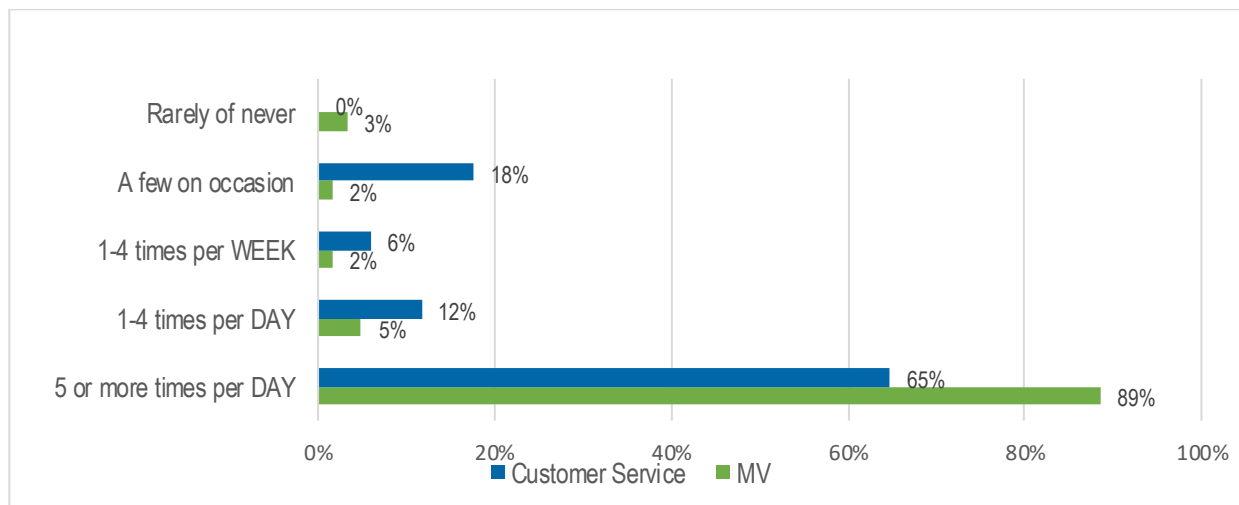


Source: Language Assistance Plan Agency Survey Results, 2021.

MV bus operators, Herzog rail operators, and Capital Metro Customer Service employees are the respondents who have the most public-facing interaction on a daily basis. To best serve the purpose of this survey, it was important to see if there was commonality in their experience. Only 3% of MV respondents Service staff indicated that they have little to no interaction with LEP individuals, while no Customer Service staff indicated that they have no LEP interactions.

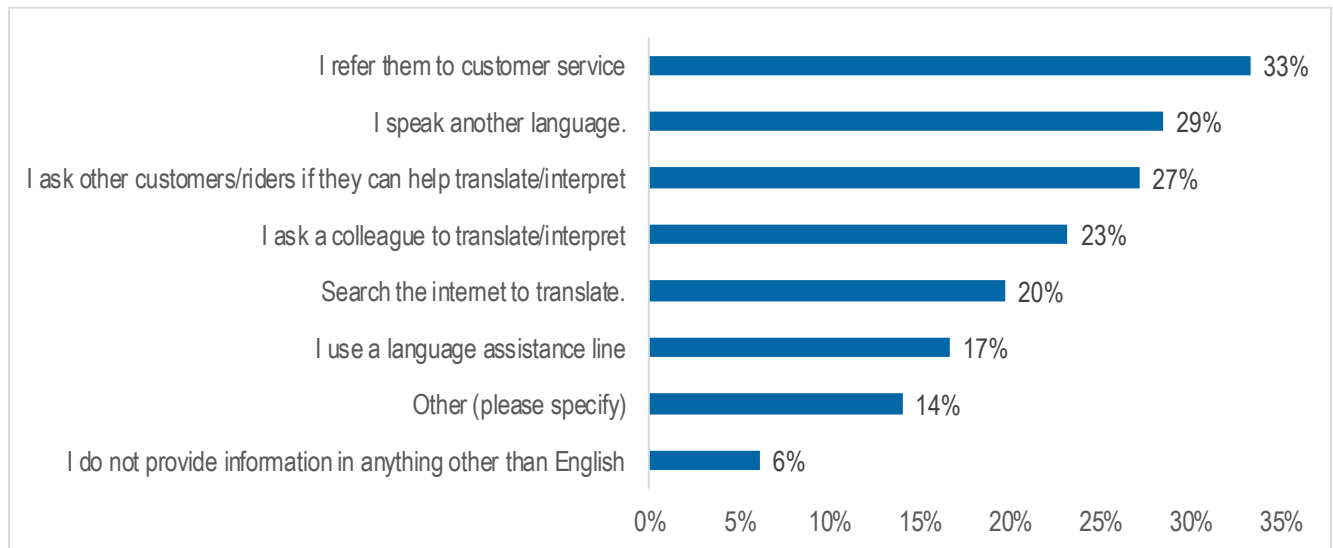
89% of the MV respondents interact with customers and/or members of the public 5 or more times per day, compared to about 65% of the Customer Service staff. Respondents listed Spanish as the language most often heard by customers and/or members of the public, followed by Arabic, Chinese, and then Vietnamese. 5% of the MV respondents encounter LEP customers and/or members of the public 1-4 times per day, compared about 12% of Customer Service staff. **Figure 3: Customer Service Staff and MV Operators' Frequency of LEP Encounters**, presents the MV bus operators' and Customer Service representative's frequency of contact.

Figure 3: Customer Service Staff and MV Operators' Frequency of LEP Encounters



Source: Language Assistance Plan Agency Survey Results, 2021.

The employee survey also provided insight into how Capital Metro handles requests for language assistance which can help refine how Capital Metro can improve their language assistance measures. When asked about how they currently provide information to customers who do not communicate well in English, the vast majority of respondents indicate that they provide some level of direction so that customers can be helped. Only 6% indicated that they do not provide information in anything other than English, although these respondents could have also asked other riders for help or other methods to provide assistance. **Figure 4: Methods of Providing Information to LEP Customers** provides the survey responses for how employees provide information to LEP customers.

Figure 4: Methods of Providing Information to LEP Customers

Note: Does not add to 100%, as respondents could choose as many as applied.

Source: Language Assistance Plan Agency Survey Results, 2021.

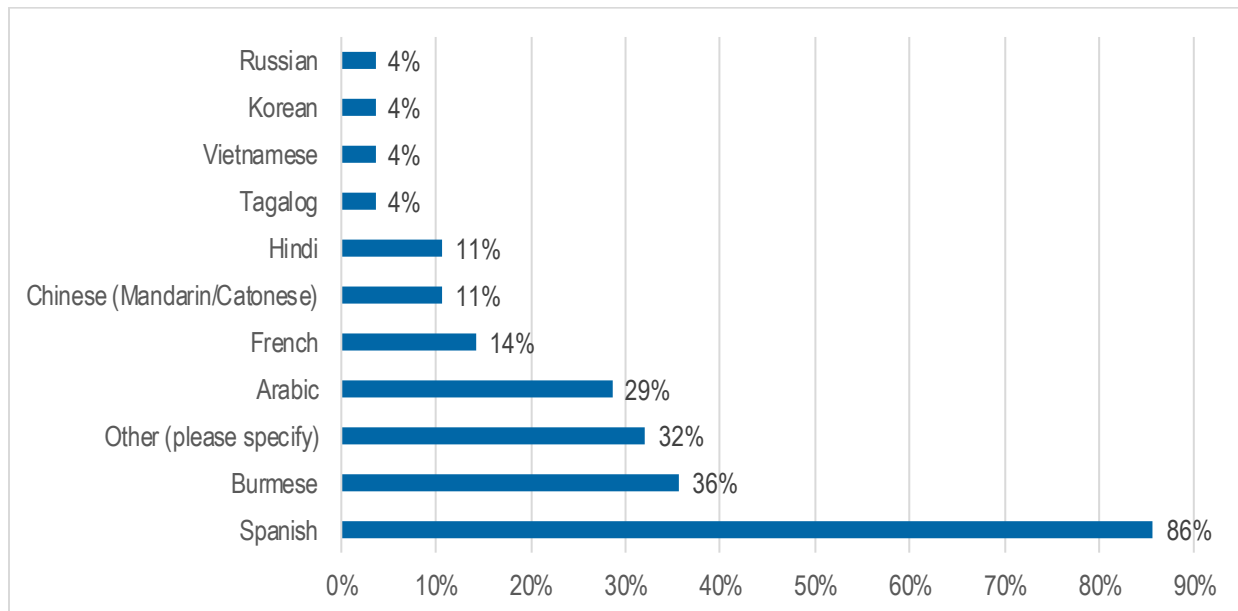
Community Based Organization Consultation

Feedback from employees was not the only feedback obtained as Capital Metro sought to update its LAP. Via an online survey, over 30 CBOs maintained in Capital Metro's database were asked to speak for the communities they represent, and offer their insights about the needs of community members with LEP and how Capital Metro could better meet those needs. See **Appendix A: LEP Public Involvement Summary** for the CBO's survey questions.

CBOs were also consulted so that Capital Metro could understand how their constituents both used Capital Metro services, the languages their constituents speak and what types of language assistance services would be useful. Due to COVID-19, it was not feasible to speak to LEP populations in person through focus groups or surveys. As a result, we relied on CBOs to represent their clients' needs.

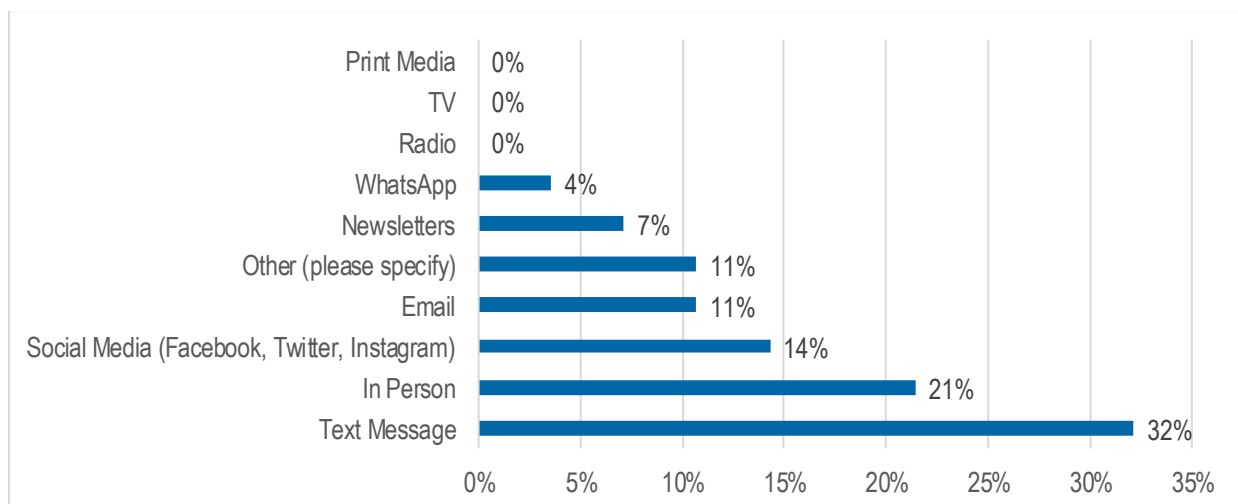
The survey was designed to include people representing non-profit organizations, such as those providing social services, immigration or legal information as well as other governmental agencies and educational and business organizations. In total, 28 representatives of 8 different CBOs completed the survey.

When asked which languages that the CBOs typically translate to provide information to their community, the overwhelming response was Spanish at 86%, followed by Burmese, Arabic, French, Chinese and Hindi. Other responses included Dari, Pashto, Swahili and Kinyarwanda. This corresponds with the Austin Independent School District English Learner data reviewed in Factor 1. **Figure 5: Translated Languages by CBOs** below, provides the full CBO responses.

Figure 5: Translated Languages by CBOs

Source: Community Based Organizations Survey Results, 2021.

The CBO survey also provided insight into how their clients wanted to receive communications. As anticipated, the most common response was “text message”, at 32%, followed by “In person” at 21%. Those who responded “other” indicated that phone calls were preferred. Due to the popularity of online/electronic methods (social media, WhatsApp, text) the historical methods of communication that transit agencies have used (print, radio or TV) may not reach the LEP populations. **Figure 6: Preferred Method of Communication for LEP Clients** presents the preferred method of communication for LEP clients.

Figure 6: Preferred Method of Communication for LEP Clients

Source: Community Based Organizations Survey Results, 2021.

Language Line Data

Capital Metro reviewed Language Line call data for 2019 to 2020 to understand the languages that were requested within the last year and the frequency with which the service was used. Additional data will be

reviewed in Factor 4, as the costs and resources to provide this service will be considered. The Language Line data includes general customer service calls, trip planning for fixed route bus and paratransit trip scheduling. **Table 7: Language Line Calls November 2019 to October 2020** presents the Language Line usage for October 2019 to October 2020. The monthly totals show, a decrease in calls beginning in March 2020 due to COVID-19, as people were sheltering in place. However, the languages reflected similar concentrations regardless of the reduced use.

As expected, Spanish remains the predominant language, followed by Swahili and Arabic; languages that were not identified in any unique concentration in the ACS data. Further follow up with the Paratransit department has revealed that the calls in Swahili relate to one customer who uses the Language Line services regularly to schedule their trip.

Five languages were not represented in any significant concentrations in any of the other data reviewed: Tagalog, Farsi, Kinyarwanda, Urdu and Portuguese. For these several customers, Language Line may be the most efficient way to provide language assistance.

Table 7: Language Line Calls November 2019 to October 2020

Language	Minutes	Calls	Avg Length of Call	% Total (Minutes)	Avg Interpreter Connect Time (Seconds)
Spanish	20,459	2,543	8.0	94.0%	79
Swahili	465	27	17.2	2.1%	267
Arabic	60	2	30.0	0.3%	8
Kinyarwanda	30	4	7.5	0.1%	18
Vietnamese	41	4	10.3	0.2%	6
Farsi	2	1	2.0	0.0%	2
Tagalog	42	3	14.0	0.2%	8
French	503	33	15.2	2.3%	56
Korean	2	1	2.0	0.0%	1
Urdu	48	2	24.0	0.2%	249
Mandarin	89	4	22.3	0.4%	61
Portuguese	22	2	11.0	0.1%	4
Total	21,763	2,626	8.3	100.0%	759

Source: Capital Metro: LanguageLine Services Inc. Invoices, November 2019 – October 2020.

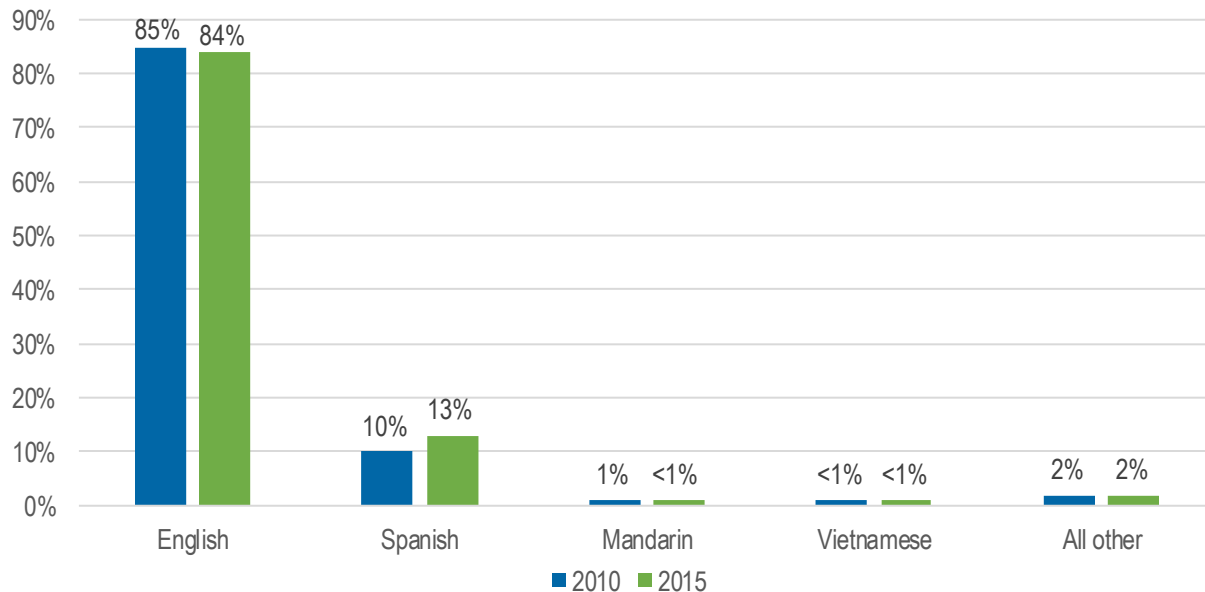
Origin and Destination Survey

The Origin Destination Survey conducted in 2015 provides a unique view of the ridership with regard to language and other characteristics that are useful to the Four Factor Analysis. Approximately 21,000 surveys were collected via intercept in the spring of 2015. The questionnaire was developed to determine riders' origins, destinations, fare payment and other information to develop models of travel patterns as well as profiles of the riders.

Question 19 of the survey asked riders to select the language they preferred to speak in the home. While not a surrogate for LEP status, it does provide a better understanding of the ridership of the system compared to the general countywide data contained in the ACS data.

Figure 7: Preferred Home Language 2010 and 2015 provides a comparison between 2010 and 2015 survey results, showing that approximately 13% of the rider population prefer to speak Spanish in the home, followed by about 1% of both Vietnamese and Mandarin. Spanish is up a few percentage points from 2015, which may signal that Spanish language needs may be growing.

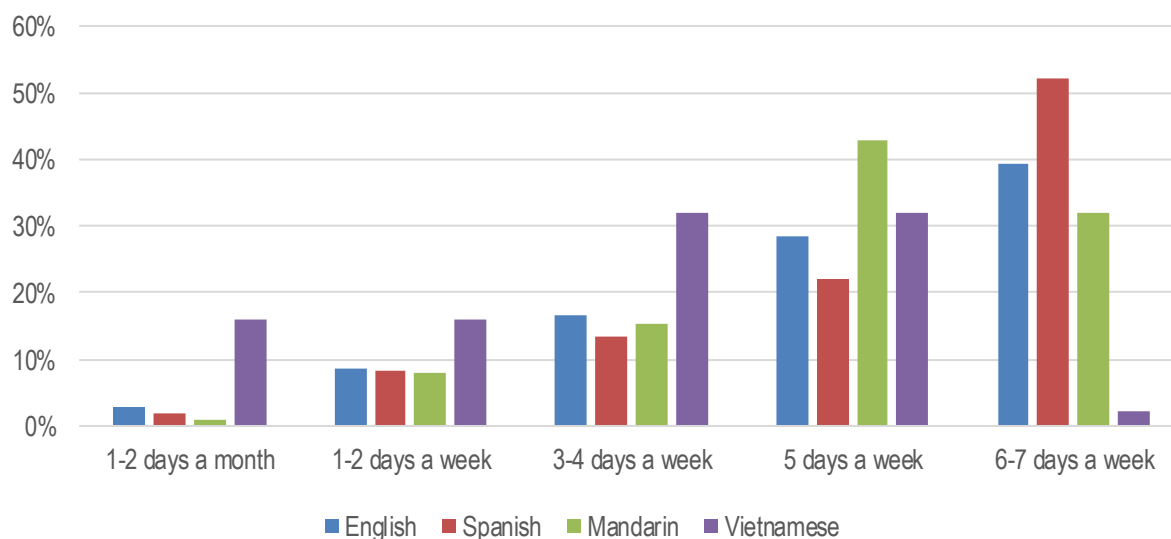
Figure 7: Preferred Home Language 2010 and 2015



Source: Capital Metro Origin and Destination Study Summary of Findings 2015; Creative Consumer Research

The Origin and Destination Survey also provided a snapshot of transit use among those who prefer to speak another language at home (see **Figure 8: Frequency of Transit Use by Preferred Language**). Question 22 asked how often users rode the system. This response was cross tabulated with those who prefer to speak another language at home. While not a surrogate for LEP status, Spanish speakers are frequent transit users of the systems with more than 50% indicating that they use the system 6-7 days a week. Over 30% of Chinese speaking riders also indicate they use the system 6-7 days per week and 30% of the Vietnamese speaking population indicate they use the service at least 5 days a week. This helps provide a better understanding of the importance of the transit system, as well as how frequently staff may encounter LEP riders on board their vehicles.

Figure 8: Frequency of Transit Use by Preferred Language



Source: Capital Metro Origin and Destination Study Summary of Findings 2015; Creative Consumer Research

2.3.1 Factor 2 Findings

Contact with people who do not speak English very well was assessed through the Factor 2 analysis, which confirms that the LEP community frequently uses Capital Metro services, and that Capital Metro employees often cross paths with persons needing language assistance. About eight in ten of all employees who responded to the survey have some level of contact with the public. More than a third of them also encounter people who do not speak English very well on a daily basis.

Asked what people with LEP are typically seeking, employees most often point to schedule information (55%), connections (53%), routes/wayfinding (34%) and fares (33%). Almost 40% of employees report LEP persons were seeking information about service changes or detours, which comports with changes associated with COVID-19 service changes.

The languages encountered by Capital Metro employees and contractors mirror those identified in the Factor 1 analysis: 99% say Spanish is one of the top languages spoken by people who do not speak English very well. All other languages rank between 13% and 3%, with several lightly spoken languages reaching only 1%.

CBO outreach also helped assess contact between the LEP population and Capital Metro, with about 57% indicating that their LEP clients sought information from Capital Metro at least monthly. The CBO input also provided corroboration for the addition of several languages, including Burmese, French and Pashto.

2.4 Factor 3 Overview

Factor 3 includes the nature and importance of the program, activity, or service provided by the recipient to people's lives. "The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed... An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment."⁷

While not a surrogate for LEP status, Spanish speakers are frequent transit users of the systems with more than 50% indicating that they use the system 6-7 days a week according to the Origin and Destination survey described in Factor 2. Over 30% of Chinese (Mandarin) speaking riders also indicate they use the system 6-7 days per week. This helps provide a better understanding of the importance of the transit system, as well as how frequently staff may encounter LEP riders on board their vehicles.

Several data sources were consulted in the development of this task, including ACS data, employee survey data and CBO survey data.

Capital Metro Services

While Capital Metro's services are predominantly fixed route bus service, there are a number of other services that must be considered when developing the LAP to ensure that language assistance is not a barrier to participation. This includes a thorough understanding of the programs and activities that Capital Metro operates, which includes fixed route services, MetroAccess ADA paratransit, Pickup demand responsive services, Metrobike, Vanpool, and the Guaranteed Ride Home program.

ACS Data

To understand the importance of public transit to the general population, ACS data was reviewed for LEP worker populations as well as for all workers over the age of 16. While this does not fully address the role that Capital Metro's service play in overall mobility, it does present a snapshot of those commuters who rely on public transit within the two counties to access their jobs. As presented in the **Table 8: Travis and Williamson County Transit Use** below, approximately 13% of the LEP population in Travis County use public transportation to commute to work, compared to almost 3% of the general population.

Table 8: Travis and Williamson County Transit Use

	Travis County Public Transit Use Percentage	Williamson County Public Transit Use Percentage
All Workers 16 years or over	2.6%	1.1%
Speak English Less Than Very Well	13.4%	0.0%

Source: ACS, 2019 one-years sample Table S0802

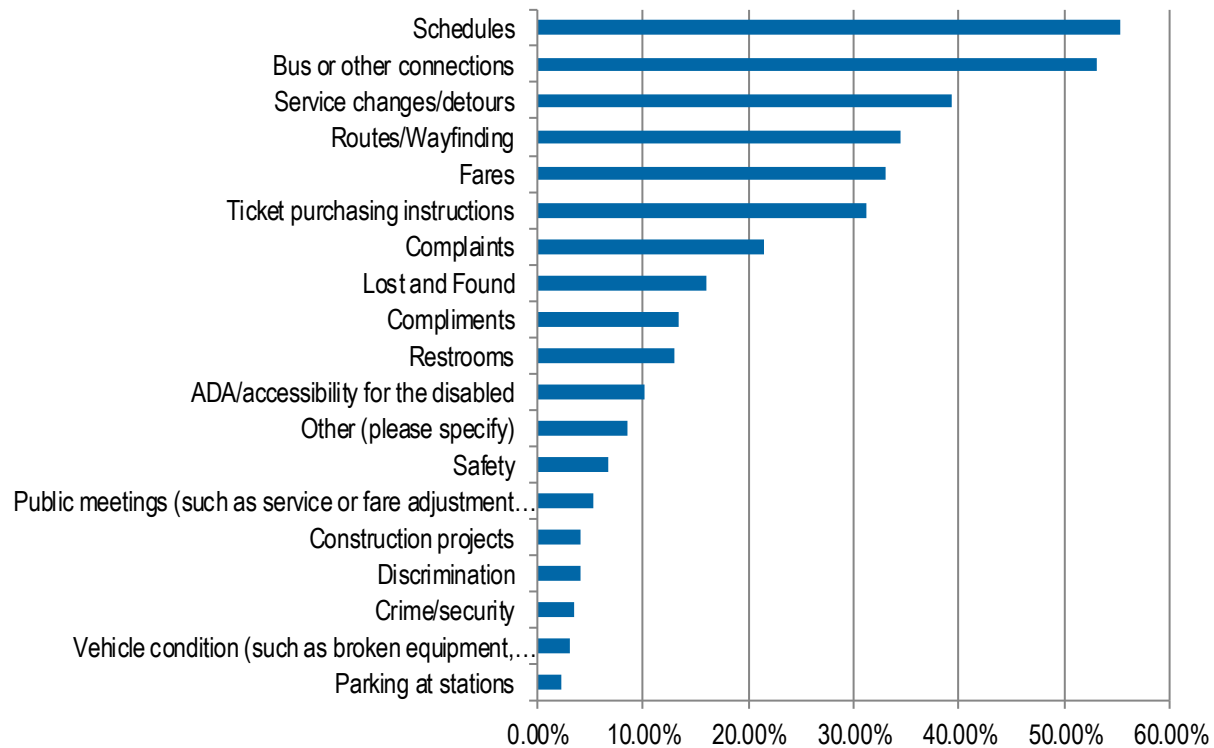
Employee Survey

Employees were asked what information was being sought by the LEP population which provides more clarity on how LEP riders may be interacting with the agency (see **Figure 9: Information Sought by LEP Customers**). Almost 60% of the respondents indicated that those who do not speak English very well are typically seeking information about schedules/routes/wayfinding followed by information on fares and ticket

⁷ Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons--A Handbook for Public Transportation Providers, 2007

purchasing. This signals that customers calling into the service were actually using the services and were likely to need service-related language assistance. (see **Appendix A: LEP Public Involvement Summary** for the Agency Survey Questions).

Figure 9: Information Sought by LEP Customers

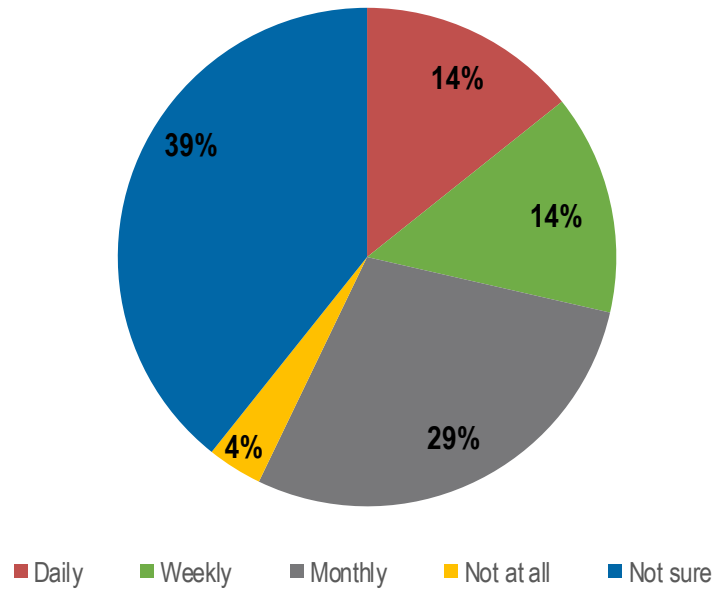


Source: Language Assistance Plan Agency Survey Results, 2021.

CBO Survey Results

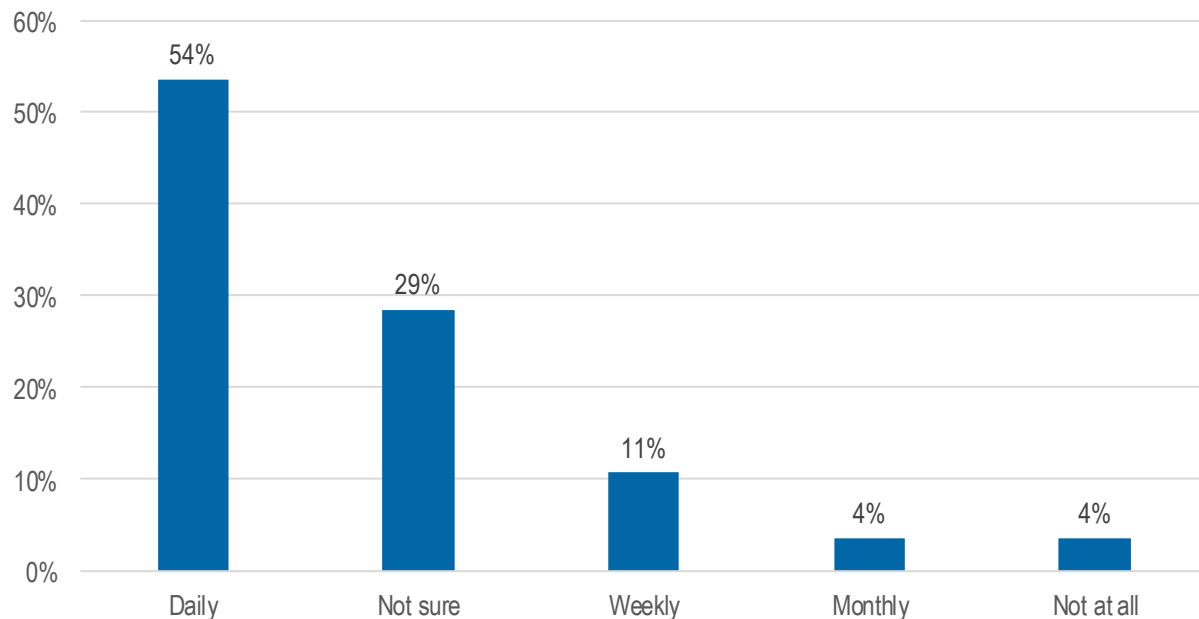
The CBOs also provided information about their clients use of the Capital Metro services that helps explain how important the services may be for them. Over 57% responded that their clients sought information about Capital Metro's services at least monthly, with 14% seeking information daily (see **Figure 10: Frequency of Seeking Information**).

Figure 10: Frequency of Seeking Information



Source: Community Based Organizations Survey Results, 2021.

Figure 11: Frequency of Use of Capital Metro Services.



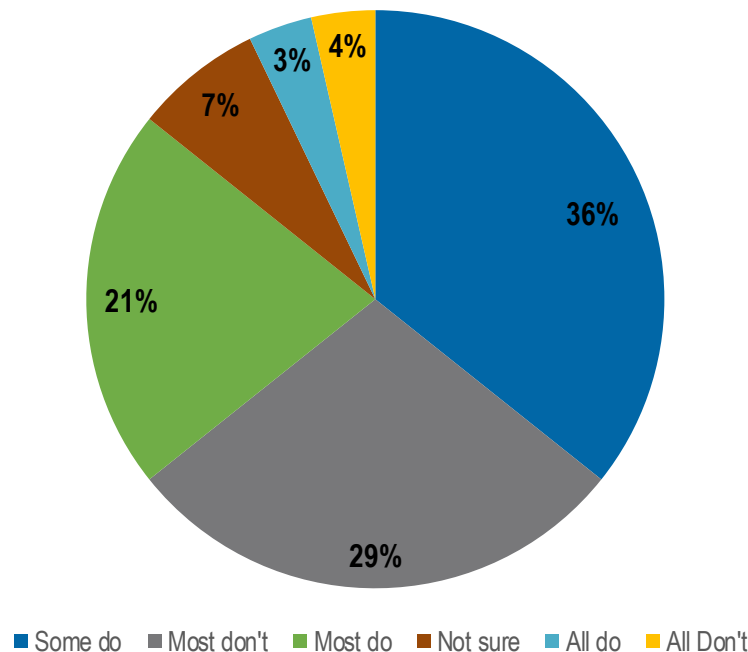
Source: Community Based Organizations Survey Results, 2021.

Even more crucial to our understanding of the LEP populations that the CBOs serve was how often their clients use Capital Metro service for general mobility (see **Figure 11: Frequency of Use of Capital Metro Services**). 54% indicate that their clients use the service daily, and 11% indicate at least monthly. This

signals that Capital Metro services are important to the LEP community that they serve and may represent the primary means of mobility.

CBOs also provided insight on auto availability and how important transit services might be to their community presented in **Figure 12: Auto Availability of CBO Clients**. Over 30% indicate that autos are mostly or not at all available to their clients. This is contrasted with 57% indicating that most or some of their clients do have an auto available. This may mean that most indicate that their clients used Capital Metro services daily, they may also have used a car for the trip.

Figure 12: Auto Availability of CBO Clients



Source: Community Based Organizations Survey Results, 2021.

2.4.1 Factor 3 Findings

Transit service is arguably an important public service for many riders. However, to LEP populations, Capital Metro is a vital service that provides both commuting options as well as general mobility. When asked, 30% of the CBO respondents indicated that most of their clients do not have a car available for their use. As the research underscores, Capital Metro service is a vital means of transportation for those who do not speak English very well. Employees and CBO leaders agree there is a need to ensure Capital Metro is able to communicate with those who do not speak English very well and that the LEP community is able to successfully navigate using the system without knowing English.

Providing critical information in languages most commonly used by the LEP community ensures that LEP riders can access the services and programs that Capital Metro provides. Frequent connection with CBOs serving these populations, with LEP riders themselves, and with the agency's own employees will provide feedback on Capital Metro's success in continuing to ensure all have equal access to the services and programs that Capital Metro provides.

2.5 Factor 4 Summary

The final step in the four-factor analysis is designed to weigh the demand for language assistance against current and projected financial and personnel resources. The DOT Guidance says, “A recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, “reasonable steps” may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.”

Annual costs associated with the current measures to provide services and information in other languages for the last fiscal years are estimated below. Capital Metro does not have a specific line item to capture the budgeted costs and expenditures that can be easily tracked. Language assistance services are not specifically called out in departmental budgets, but rather are seen as a necessary effort within the greater department’s operation. This is the case in the audible announcement program, whose costs include translations and interpretations as requested for up to 5 languages in addition to English. Additionally, translations or interpreting associated with the functional assessments of disabled individuals that are seeking ADA paratransit eligibility undertaken by a contractor are also included in that contractor’s budget. As such, these amounts are not the absolute costs, as some language assistance expenses are either included in other contractors’ budgets or are included in line items such as “Other Services.”

Additionally, no cost estimates exist for the translation or interpretation assistance that are provided by existing staff who speak other languages and provide ad hoc translation or interpretation services such as the Customer Service representatives that provide Spanish interpretation on wayfinding, schedules and other customer requests. While Spanish translation or interpretation is not the Customer Service representatives’ only function in the agency, it does represent a significant portion of their job and should be considered in the overall effort that Capital Metro expends to provide language assistance. Further, the translation and interpretation costs below do not take into consideration language assistance measures provided through Capital Projects contractors, which are internalized with the total contract costs and may be independently funded through grants. The greatest expense to the agency currently is associated with the provision of interpretation services through the third-party contract with Language Line services, indicated below. **Table 9: Estimated Translation Costs** and **Table 10: Language Line Costs** below, highlights the magnitude of costs associated with Spanish language assistance services that were provided by the service in comparison to the other languages that are served.

Table 9: Estimated Translation Costs

Expenses	FY 2020
Total Agency Expenses	294,020,916
Language Line Services	\$12,687.00
Marketing/Communications	\$7,351.00
Customer Service	\$1,673.00
Civil Rights	\$5,000
Total	\$26,711.00
% for Translations	0.01%

Source: Capital Metro, 2021.

Table 10: Language Line Costs

Language	Charges
Spanish	\$11,866.22
Swahili	\$292.95
Arabic	\$37.80
Kinyarwanda	\$18.90
Vietnamese	\$25.83
Farsi	\$1.26
Tagalog	\$26.46
French	\$316.89
Korean	\$1.26
Urdu	\$30.24
Mandarin	\$56.07
Portuguese	\$13.86
Total	\$12,687.74

Source: Capital Metro: Language Line Services Inc. Invoices, November 2019 – October 2020.

2.5.1 Factor 4 Findings

Capital Metro understands that reducing barriers to services and benefits of Capital Metro to the extent resources are available will reap symbiotic benefits for the LEP populations as well as the agency. With more LEP individuals using Capital Metro, revenue may increase as well, likely making more funds available for increased language assistance programs. Capital Metro commits to devoting resources – monetary and staff time – to enhance LEP persons' use of the Capital Metro programs and services. Insofar as it is practical, ensuring that critical information is available in languages most commonly spoken within the Capital Metro service area is important to providing access to Capital Metro's services for LEP populations.

It may be impossible to determine the true costs of language assistance services as many costs are unaccounted for or are included in line items that are hard to separate. Additionally, staff who currently speak another language and provide ad hoc language assistance are not accounted for in the agency's total costs. However, while there are some costs that are included in other budgets within the agency's operation, the agency has a relatively small translation budget associated with language assistance to LEP populations.

Having a separate line item for language services within the agency would help quantify the costs associated with additional assistance outside of providing staff-related translations or interpretations. This way, costs can be tracked in the departments that have on-going expenses related to language services and planning for larger scale translation efforts could be more easily estimated, such as those associated with service or fare changes. Additionally, contracts that include outreach or scoping efforts should ensure that translation and interpretation costs are budgeted and tracked through the life of the contract. This can be especially useful, as grant funds used for capital projects can help offset agency language assistance costs, particularly if grant funding is anticipated for projects included in the Project Connect Vision Plan.

2.6 Four Factor Findings and Strategies

The Four-Factor analysis provides clear support for Capital Metro's approach to universal access to its services and system regardless of English language proficiency and language spoken. Among the highlights of this analysis are:

- **Factor One:** Over 15% of the population in the service area do not speak English very well and are considered to have Limited English Proficiency. One language—Spanish—remains the predominant LEP language in both counties, amounting to 9% of the population in Transit County and 5% in Williamson County. 10 languages are included as Safe Harbor languages including languages that were added for translations due to community and staff input. The languages are: Spanish, Arabic, Burmese, Chinese (Mandarin), French, Korean, Pashto, Punjabi, Telugu and Vietnamese.
- **Factor Two:** The LEP community frequently accesses Capital Metro services and information, and Capital Metro employees often cross paths with persons needing language assistance. About 20% of all surveyed employees encounter people who do not speak English very well on a daily basis, while almost 90% of MV bus operators and Customer Service staff regularly encounter LEP populations. Additionally, almost 60% of the CBOs responded that their clients frequently sought information for Capital Metro about their services and programs.
- **Factor Three:** Capital Metro's services are important to the LEP community. The LEP population either regularly uses Capital Metro, or uses it at least sometimes, according to the CBOs. Census data also shows that LEP populations use transit about 5 times more than non-LEP populations in Travis County. CBOs also indicated that about 1/3 of their LEP clients do not have a car available for their trip and must rely on Capital Metro for their general mobility.
- **Factor Four:** The analysis shows that Capital Metro plans for the myriad activities that they currently undertake to ensure that people who do not speak English very well are able to access the system as easily as the general population. While, Capital Metro only spends a little over 1/10th of the operating budget on language assistance services, this does not include the hidden costs associated with staff providing on-site and ad hoc translation and interpretation services. Recommended changes will help Capital Metro plan into the future to monitor and budget their activities to ensure they are cost effective and help those with the greatest need.

3. Language Assistance Plan Overview

The Department of Transportation (DOT) LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP Guidance notes that effective implementation plans typically include the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons; and 5) monitoring and updating the plan.

This plan represents a continuing approach to providing language assistance. While some language assistance measures are in place, other methods of providing language assistance are being implemented over time to ensure continued compliance with federal requirements. This plan also includes recommendations that would assist Capital Metro to reach best industry standards for providing language assistance for those needing to access Capital Metro programs and services

3.1 Identifying LEP Individuals Who Need Language Assistance

The Four Factor analysis considered a number of data sets to determine the languages that would require “Safe Harbor” consideration, in addition to languages predominantly used by Capital Metro riders. These data included Census data (American Community Survey 5-year sample 2015 for Williamson County and 1-year sample for Travis County), the Austin Independent School District English Learners data 2019 and the Capital Metro 2015 Origin and Destination Survey. A little over 10% of the population in Travis County and 5% of the population in Williamson County speak English less than “Very Well” and would be considered the LEP population.

Based on the Four Factor analyses, the most frequently encountered languages broken into two groups:

- Primary: Spanish represents the language spoken in the heaviest concentration within the service area
- Safe Harbor and additional languages: Arabic, Burmese, Chinese (Mandarin), French, Korean, Pashto, Punjabi, Telugu and Vietnamese.

3.2 Providing Language Assistance Measures

Capital Metro is committed to providing meaningful access to information and services to its LEP customers. Capital Metro uses various methods to accomplish this goal. Along with enabling persons who do not speak English very well to navigate the system with the same ease as the general population, it is necessary to provide a meaningful opportunity for LEP persons to participate in the public comment process for planning activities and major capital projects. Specific methods pertaining to outreach will be discussed in Capital Metro’s Public Participation Plan.

Currently, the Capital Metro primary language tools include the following:

- Providing Notice to Beneficiaries and Title VI complaint procedures and forms in all Safe Harbor Languages
- Providing Google Translate on the Capital Metro website, allowing translations for most content
- Providing bilingual customer service and marketing staff to provide on-site Spanish speaking translations and interpreting in a variety of settings
- Making Language Line services available for any staff, including Customer Service staff, to address language assistance needs for any language

- Holding public meetings in Spanish or with simultaneous English/Spanish translations
- Offering interpreters by request for public meetings, public hearings or board meetings
- Posting public meeting notices in foreign language newspapers to reach LEP populations
- Providing Spanish translations and pictograms on board vehicles, on Ticket Vending Machines, at bus stops and at stations
- Producing Spanish language video content
- Creating Spanish translations for some informational brochures and marketing materials
- Tapping into CBO assistance in outreach to LEP populations and language assistance.

The following are recommendations that would improve the level of service that Capital Metro provides to its LEP customers and that can be implemented over time as budget and staff permits. These activities are organized into four categories:

1. General, including such things as internal awareness and public outreach strategy
2. Materials and documents
3. Translation and interpretation tools and protocols
4. Employees, including training or incentives to empower employees to provide assistance

General Title VI and LEP Awareness

Title VI and LEP awareness are the cornerstone of the entire Title VI program and can further understanding within the agency. A number of recommendations may help to improve the practice:

- **Title VI Awareness Training:** integrate Title VI awareness into all activities of the agency
- **Public Engagement Needs and strategies:** draft a handbook with protocols and procedures for all departments that interact with the public including incorporating language assistance measures; consider designating a “Language Access Coordinator” to act as point person for implementation and monitoring of language assistance needs.
- **Project Charter:** develop a protocol to ensure that Title VI and/or LAP issues are acknowledged and addressed by each department’s project manager, including a form outlining the LEP strategy that is submitted to the Title VI office for approval.
- **Demographic analysis of new project areas:** consider the attributes of the new projects’ geography.
- **Eliminating English-only informational campaigns:** include “Free Language Assistance” text box at a minimum to ensure participation of LEP populations.
- **Develop or enhance relationships with Community Based Organization :** continue to expand the CBO database and engage CBOs to improve communication methods.
- **Contract compliance:** ensure that contract terms includes requirements for contractors to provide public information that complies with Title VI LEP guidelines.

Materials and Documents

- **Title VI Public Notice, Complaint Form and Procedures** (Vital Document): notice should be in all Safe Harbor languages on the website and posted on-board vehicles, in the Board room, at the General Office lobby, Transit Store, stations, or other public areas.
Notice of Free Language Assistance (Vital Document): notice of free language assistance should be located on the mast head of Capital Metro's website and included in all printed and digital materials; this should also be posted with the Title VI information in the Board room, at the General Office lobby, Transit Store, stations, on-board vehicles or any location where riders may congregate.
- **Legal Notices** (Vital Document): translations of legal documents should be translated upon request.
- **Registration Forms** (Vital Document): make sure that all registration forms on the website can be translated using online tools (Google Translate or others) and for printed materials, forms should be translated into Spanish with "Free Language Assistance" printed at the bottom of all forms for other Safe Harbor languages.
- **Fare and Service Change Information** (Vital Document): translate into Spanish with "Free Language Assistance" text box printed on all documents.
- **Safety and Security Information**: use pictographs as much as practicable.
- **TVMs, fareboxes, bus stops and onboard equipment**: translate into Spanish as needed and use pictographs onboard vehicles when applicable. Translate bus/train/station announcements into Spanish and other languages as budget permits.
- **General Promotional Materials**: Translate into Spanish as budget permits or as required by issue. Print "Free Language Assistance" on all promotional materials.
- **Construction, Detour, Stop Move, and Other Courtesy Notices**: translate into Spanish when feasible, and other languages as determined by analysis of location.
- **Website Materials**: make sure that all content (including navigation buttons) is in a form that can be translated using online tools; upload documents in original form and not scanned so documents can be translated. Use pictograms as necessary instead of printed text.
- **Rider Guides and Materials**: develop rider guides or other materials in Spanish and other languages as funding permits; incorporate illustration and pictograms as feasible; produce how to ride videos with translations, create "how to ride" curriculum for ESL schools in the area.

Translation Tools and Protocols

- **Language Line Service**: promote the use of service via "Free Language Assistance" text block that lists the Customer Service telephone number that can connect to Language Line services, including on the website, in all printed and digital material; investigate options to improve language recognition on phone tree when engaging calls.
- **Line Item for Translation and Interpretation**: use budget codes to monitor and plan for translation and interpretation expenses, including grant-funded capital projects that can be used to help fund necessary language assistance.
- **Public Hearing Protocol**: provide Spanish interpreter for all public hearings and offer other Safe Harbor interpreters with advanced notice.
- **Board Meeting Protocol**: provide requested interpreters with a 72-hour notice for all Safe Harbor languages.

- **Community Meetings Protocol:** provide Spanish interpreters for at least one meeting within the outreach subject matter (such as service changes or major project outreach); offer interpretation or translation of materials in advance of the meetings.
- **Simultaneous Interpretation Equipment:** consider simultaneous interpretation equipment to offer greater flexibility for language translation.
- **Language Identification Cards:** create and distribute language identification cards to all employees (and in operators' pouches) with Language Line phone and account numbers included for remote or emergency situations. Consider adding QR code that directs employees to Language Line.
- **Language Manual:** create language manual that includes common phrases used by riders in other languages that can be phonetically spelled out.
- **Digital Tools or Language Technology:** help employees take initiative to use new technology to provide language assistance for users; provide training on new apps and technology.
- **Mobile Apps:** ensure that new Capital Metro sponsored apps allow for interpretation and translations into Safe Harbor languages; ensure that existing apps such as required for Pickup can accommodate additional languages beyond the current Spanish translations.
- **Website Administration and Management:** move Google Translate to the top of the webpage and add all languages to the Google Translate function; Add "Free Language Assistance" in all Safe Harbor languages with the Customer Service telephone number that connects to Language Line or consider creating a Language Assistance page that can provide translated materials along with the Customer Service telephone to obtain translated materials or interpretation services; Remove pictures with text that cannot be translated; Add Google Analytics to determine how LEP users interact with the website.

Employees

- **New Employees** (and contractors): Include ability to speak another language as a desired qualification in hiring.
- **Bilingual Employees:** Identify jobs where bilingual ability is required or desired; Investigate the ability to pay a shift differential for employees who speak another language and whose job requires customer contact.
- **Employee and Contractor Training:** hold Title VI and LEP training for all new hires (both agency and contractors), including operator refresher training; conduct training for planning and marketing staff to integrate consideration of Title VI protected populations (including LEP) into planning.
- **Training for Title VI-Related Complaints for Employees and Contractors:** Expand diversity training for operators on the need to accommodate LEP populations to avoid Title VI related complaints.
- **Language Identification Cards:** Distribute language identification cards to operators or other employees; Consider adding QR code that directs staff users to Language Line.
- **Employee Tuition Assistance:** Promote the availability of tuition-reimbursement for all applicable employees who take a course to learn the primary languages in the Capital Metro service area.
- **Employee Shift Differential:** Consider offering monetary shift differential for positions that require frontline contact with LEP populations for those who speak a Safe Harbor language fluently.

3.3 Training Staff

Training staff on the protocols to provide language assistance and Title VI in general helps to ensure that employees understand the guidance and consider the needs of LEP individuals in the course of doing their job. Currently, only transit operators receive general Title VI training, which does not specifically describe how drivers are to provide language assistance if requested. Customer service staff are instructed on how to use the Language Line service but not on more general Title VI requirements and general language assistance measures. Other employees are not given formal Title VI training, nor are they given specific LEP training to help them understand the agency's role in language assistance.

It is recommended that both general Title VI training and specific LAP training occur within the following framework:

- ***New Employee Orientation (Title VI)***: all new employees should be provided an overview of the agency's Title VI responsibilities, including general information about language assistance measures that the agency provides.
- ***LEP Training***: All frontline employees (and contractors) should attend LEP related training, with specific emphasis on elements under their job description at least upon orientation. Frontline employee classifications will be selected based on their likelihood of coming in contact with the public or being in departments that have broad community engagement activities. This will likely include Customer Service staff, bus and rail operators, Marketing and Communication staff, ADA paratransit staff and contractors, Planning and Capital Projects; however, there may be other positions that would qualify and should undertake the training. The training should be targeted to help the employees understand how to provide the language assistance measures that Capital Metro offers. This could include new tools, existing or new technology that is available, or methods to provide language assistance to ensure competency. This should also be job-specific so that participants will come away from the training with real world understanding of how to provide language assistance given Capital Metro's tools.
- ***Refresher Training (Title VI)***: Transit operators should attend Title VI training with an additional emphasis on providing language assistance as part of their normal refresher training series to address any questions that they may have regarding either encounters with LEP populations or how to provide language assistance. Training on technology or tools that are available to operators should be included.

Training can be accomplished using methods such as video learning, PowerPoint presentations, or small group learning so that the task associated with staff training does not become onerous to the agency. Videos on the subject can be produced in a cost-effective way that can be used in new employee orientation, contractor training or refresher training. This would be especially helpful when demonstrating new technology that may be available for language assistance.

3.4 Providing Notice to LEP Persons of Language Assistance Measures

As the most far reaching and important aspect of language assistance, providing notice to the public on the available language assistance is crucial. Consequently, ensuring that informing the public of how to seek language assistance plays a substantial role in the LAP. Web-based information has taken center stage in the last year, with most documentation about service disruptions, COVID protocols or other crucial information. As a result, changes to the website are being undertaken to ensure that notices of free language assistance can be front and center in the users' Capital Metro website experience. To ensure that notification

of language assistance is undertaken with a comprehensive view, there are number of recommendations that are being made to improve this practice.

One easy and effective method to provide notification of language assistance measures is to produce a text box that includes all the Safe Harbor languages, the phrase “Free Language Assistance”, and the customer service number that can be connected to Language Line. The text box can then be used on all printed materials and in the digital realm such as the example, below.

Free language assistance | Asistencia gratis en su idioma | Libreng tulong para sa wika | 免費語言幫助
Hỗ trợ giúp thông dịch miễn phí | 무료 언어 지원 | शुल्क भाषा समर्थन | бесплатная языковая помощь

The establishment of vital documents also helps Capital Metro communicate the language assistance measures and translations that should occur given the importance of the documents. **Table 11: Vital Documents Guidance** lists both vital and non-vital documents, categories of documents, and identifies the language category into which they should be translated. As has happened in the past, Capital Metro may provide a summary of a vital document and/or notice of free language assistance for the “Safe Harbor” languages, rather than a word-for-word translation of each of the vital documents.

Capital Metro should not limit itself to these guidelines, intending to translate documents into more languages as circumstances dictate and resources allow. As necessary, Capital Metro may also rely on pictographs to communicate information regardless of language spoken.

Table 11: Vital Documents Guidance

Document	Languages	Vital Document?
Title VI Public Notice	All Safe Harbor Languages	Yes
Title VI Complaint Form and Procedures	All Safe Harbor Languages	Yes
Notice of Free Language Assistance	All Safe Harbor Languages	Yes
General Promotional Materials (such as FAQs or other materials that provide direction on how to access services and public meeting notices)	Spanish and Safe Harbor Languages as funding permits	Depends on content
Public Meeting and Hearing Notices	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
“Participation” or “Intake” forms (such as Americans with Disabilities Act (ADA) Determination letter and appeal forms, and incentive forms)	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
Ridership and/or Customer Satisfaction Surveys	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Yes
Legal Notices, construction notices, or environmental findings notices	Spanish, with written notice in multiple languages that information will be translated upon request in all safe harbor languages	Depends on content

Source: Capital Metro, 2021.

3.5 Monitoring and Updating the Plan

Monitoring the LAP is an important element of keeping the plan not only up to date but relevant to the population being served. New immigrant populations with languages that were not originally identified may require additional consideration in the LAP.

Additionally, new technology changes our understanding of the best methods to use in establishing a comprehensive approach to language assistance. For example, smart phones were not as prevalent in prior years, and translation applications were not as commonplace. Social media applications like Facebook Live, YouTube live are more recent advancements to public engagement that have changed the landscape of communication. We have also seen LEP populations move away from receiving information in more historically standard formats (print, radio, TV) and opt for more text-based communications. All of these changes would not have been considered without a comprehensive review of the plan.

While a review of the LAP every three years to coincide with the Title VI update is standard, it is also important to monitor the language assistance measures periodically, along with how well the outreach activities are engaging LEP populations, so that if mid-course corrections are needed, they can be accomplished within the framework of the overall LAP. Keeping track of subtle changes in how LEP populations are engaging in outreach activities may also help understand new methods of assistance.

An annual review of the LAP would ensure that methods of outreach and communication consider small and large changes associated with the languages being requested for language assistance or to address changes in the most effective means of communicating.

This includes providing an opportunity for staff to provide feedback on the plan and the language assistance measures that may not be as effective. Informal “brown bag” sessions can provide an inviting forum that may encourage staff to become LEP experts and problem solvers for this serious concern. Community members may also play a role in the continual monitoring of the language assistance measures, as the broader community can often understand the issue in ways that the agency may not.

Informal focus groups can also be employed to help identify what language skills employees might have, how they might be able to employ them, and what activities they might best enjoy or be good at. These focus groups could include the general staff as well as job-specific as a way to further the LAP practice without significant cost.

Additionally, while the LAP provides guidance for how to approach LEP considerations in establishing new outreach campaigns, staff needs to be responsive to the community's needs in providing language assistance. This may include a targeted outreach approach that reviews demographic changes in the area to anticipate language assistance needs.

Appendix A: LEP Public Involvement Summary

LEP Public Involvement Summary

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Language Assistance Plan Public Engagement Summary

Capital Metro used a community-based public involvement strategy to obtain input from stakeholders to inform the development of the Language Assistance Plan by coordinating with institutions and community-based organizations to reach members in the LEP communities.

LAP Internal Outreach Summary

This survey summary provides an overview of survey response received as part of Capital Metro's Language Assistance Plan study. The internal survey was available between Monday, March 1st 2020 through Wednesday, March 10th, 2020. The internal survey was publicized via different communication channels outlined in the survey distribution section. The survey included a range of questions designed to capture the communication needs of Capital Metro's riders who have a limited English proficiency, how we are currently serving these individuals, and capture ways we can improve our service to these communities.

Outreach Material

- Development (Items produced)
- Example Figures (Flyer)

Survey Development

Capital Metro and the Title VI project team developed an internal survey in order to better understand the communication needs of Capital Metro's riders who have a limited English proficiency. Questions and answer categories were designed to reflect surveys used by other transit agencies, making changes that provided choices that reflect Capital Metro services. The intent of question selection was to gather valuable information on the communication needs of riders and identify what staff needs to feel equipped with helpful language assistance tools. The goal is that answers to the questions will inform the team to develop recommendations for the language assistance plan update.

Survey Distribution

The survey was posted online via SurveyMonkey.com. Capital Metro publicized and distributed the survey to Capital Metro staff, Austin Transit Partnership, contracted service providers and consultants. Capital Metro staff received the internal survey through an email and had verbal reminders during their team meeting. Contracted service providers received the internal survey via email, distributed via operator mailboxes, social media platforms, and via text. Promotional material was also available on the Timepoint TV. The survey was open from Monday, March 1st – Wednesday, March 10th.

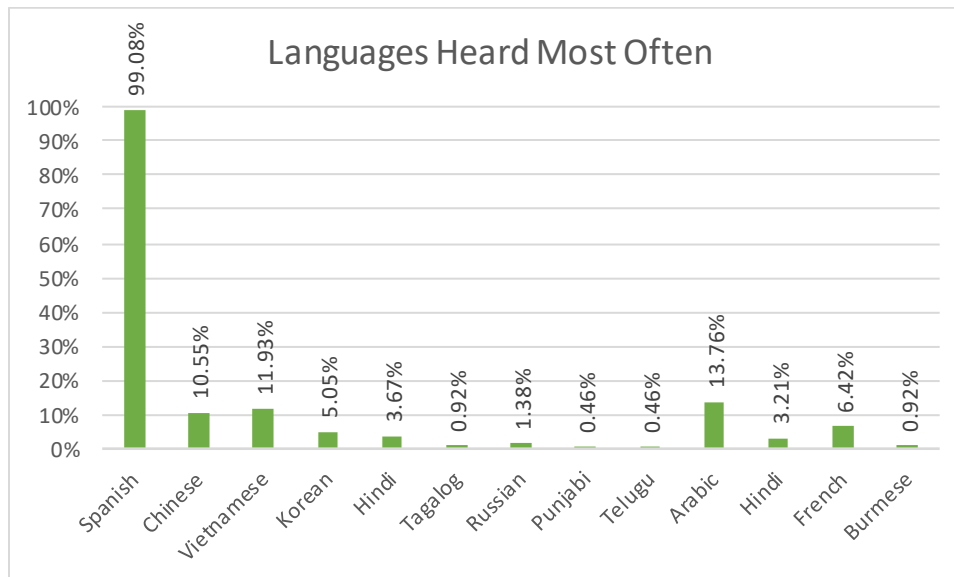
Survey Results

Capital Metro developed an internal survey, for public-facing employees and contractors. To encourage a large percentage of staff participation, Capital Metro conducted a drawing for an award available for employees who participated in the survey. A total of 229 responses were received during the survey period. Timeframe for the survey distribution was affected by the Winter Storm 2021 experienced in Texas. While an extension was offered to increase participation, the Winter Storm was a distraction. The internal employee and contractor survey aimed to identify:

1. The languages Capital Metro is regularly interacting with.
2. The frequency Capital Metro encounters individuals who speak each language.
3. The types of services Capital Metro provides to LEP communities (bus/rail service, customer service, wayfinding, etc.).
4. Methods for how Capital Metro can best reach LEP communities in Central Texas (etc. in writing, verbally, or through an interpreter).

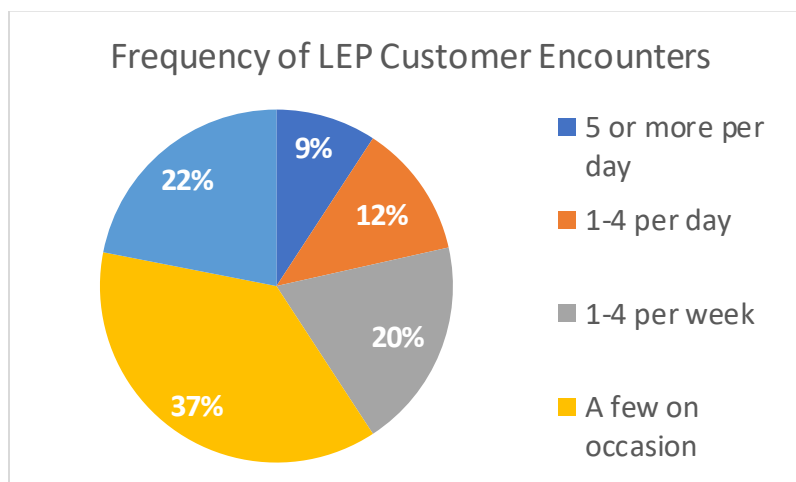
The survey found that respondents reported that Spanish is the language most often heard when interacting with customers or members of the public. Second language most often heard is Arabic, third is Vietnamese, and fourth is Chinese. Other languages that staff heard were French, Korean, Hindi, Russian, Burmese, and Tagalog, Figure 1.

Figure 1: Languages Heard Most Often by Capital Metro Staff



The survey results show that 40% (85) of respondents encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in English a few on occasion. About 22% (50) people rarely or never encounter people seeking assistance in another language than English. About 19% (44) respondents encounter people seeking assistance in another language than English 1-4 times a week, Figure 2.

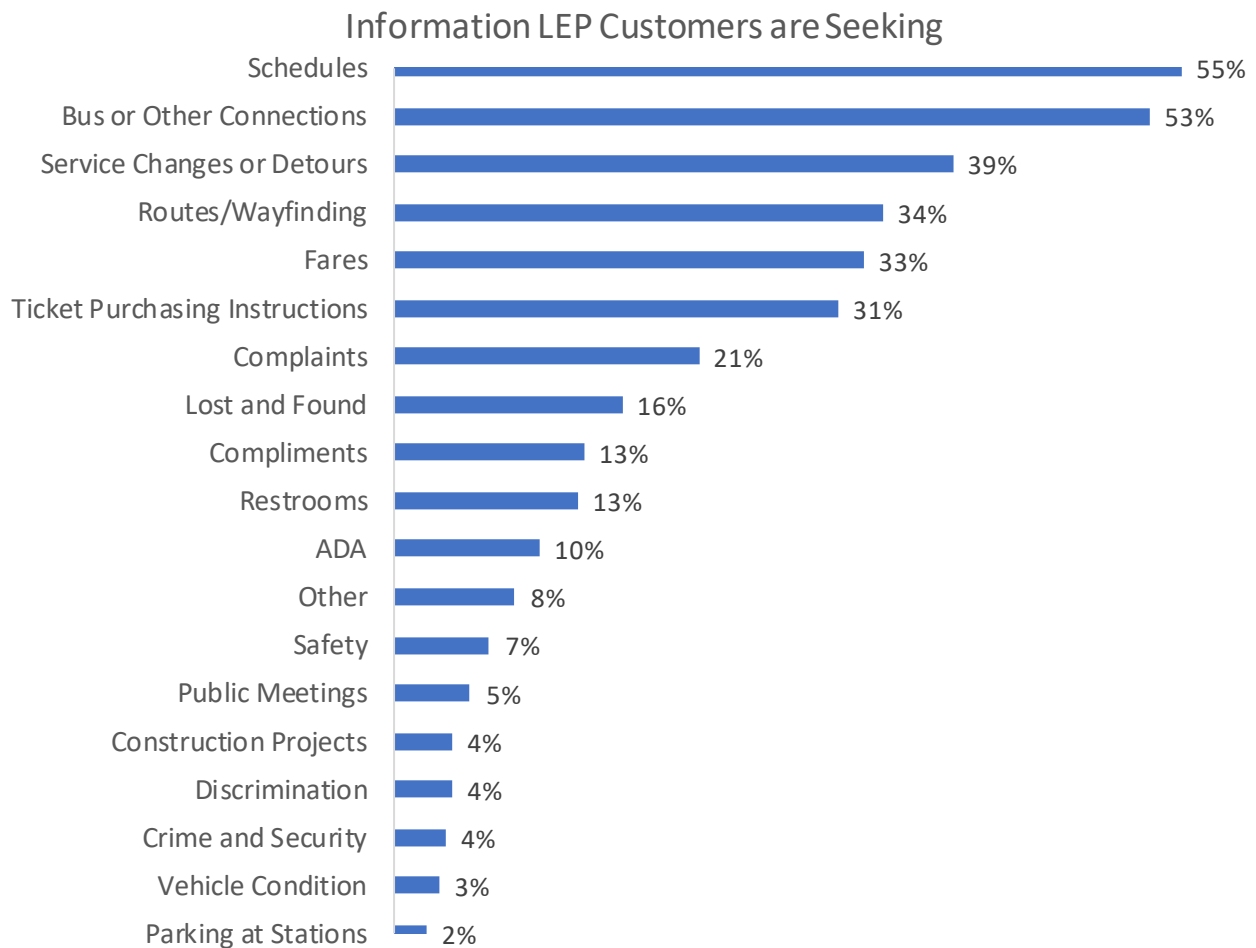
Figure 2: Frequency of LEP Customer Encounters



The survey results showed that when respondents select all the options that applied about the information customers are seeking, information regarding: schedules, bus or other connections, service change/detours, routes/wayfinding, fares, ticket purchasing instructions, complaints,

lost and found, compliments, and restrooms were the most prevalent. In the other options, some recurring themes covered questions about MetroAccess and PickUp services, along with questions about routes and destinations. There was only one response regarding a question about contact tracing for COVID-19.

Figure 3: Information LEP Customers are Seeking



Methods for how Capital Metro can best reach LEP communities in Central Texas (etc. in writing, verbally, or through an interpreter).

The following list is a summary of what was heard with the topics most suggested at the top of the list.

1. Provide Staff Language Education
2. Staff Translation App (Tablets)
3. Language Line
4. Quick Reference Guide for Transit Vocabulary in Other Languages

5. Produce Marketing Content in Other Languages
6. Sign Language Staff/Interpreters
7. Translate Capital Metro Website
8. Capital Metro Hire More Bilingual Personnel
9. Interpreters
10. More Languages on Intercom
11. Mobile Language Line
12. Capital Metro Social Media Translated
13. Capital Metro App Translated
14. CART Computer Aided Real Time Translation Device for Stops and Buses
15. Public Meetings offered in other languages
16. Capital Metro Spanish Speaking Dispatcher Available at All Times
17. Braille Reading Class
18. Provide Interpreters
19. Familiarity with Assistive Accommodating Devices
20. Material available in Chinese
21. Consider African Languages
22. Consider Farsi

LAP External Outreach Summary

This survey summary provides an overview of responses received as part of Capital Metro's Language Assistance Plan study. The external surveys were available between Monday, March 3rd 2021 through Friday, March 19th, 2021. To allow for open-ended survey questions, community conversations were held between Monday, March 3rd 2021 through Wednesday, March 31st, 2021. The external surveys were publicized via different communication channels outlined in the survey distribution section. The surveys included a range of questions designed to capture the communication needs of Capital Metro's riders who have a limited English proficiency, how we are currently serving these individuals, and capture ways we can improve our service to these communities.

Outreach Materials

- Development
- Example Figures

Community Conversations

Outreach

Capital Metro publicized the community conversations to 31 community-based organizations (CBO) that serve people who speak different languages via email communication. Community-based organizations were provided with three participation options. CBO's could ask staff to take the survey, host a community conversation with staff to allow time for open-ended questions and answers, and/or promote the translated individual survey with their community members. Questions were designed to expand on survey questions and allow for open-ended

answers and conversation on best translation and interpretation practices. The intent of question selection was to gather valuable on the communication needs of riders and identify what staff needs to feel equipped with helpful language assistance tools. The goal is that answers to the questions will inform the team to develop recommendations for the language assistance plan update. Community conversations with CBO's took place between Wednesday, March 3rd and Wednesday, March 31st.

Summary of Responses

A total of 2 responses were received during the community conversation period. Two community conversations took place with Austin Independent School District (AISD) departments. The two conversations were held with AISD's Refugee Family Support Office on Tuesday, March 23rd, 2021 and AISD's Office of Translation and Interpretation on Wednesday, March 31st, 2021. Recommendations included offering a language assistance line accessible to bus operators and public-facing employees. Training on how to use the language assistance line should be a recurring event through the year. A recommendation was to communicating a generic message in different languages such as "Bus is running late" is better than no communication at all. Both offices recommended setting up a partnership with community leaders who speak different languages to review translated material.

External Survey

Survey Development

Capital Metro and the Title VI project team developed two surveys for the public to collect feedback on the communication needs of Capital Metro's riders who have a limited English proficiency. One survey targeted community-based organizations and the second survey targeted individuals. Questions and answer categories for both surveys were designed to reflect surveys used by other transit agencies, making changes that provided choices that reflect Capital Metro services. The intent of question selection was to gather valuable on the communication needs of riders and identify what staff needs to feel equipped with helpful language assistance tools. The goal is that answers to the questions will inform the team to develop recommendations for the language assistance plan update. The surveys were brief, optimized for accessibility, translatable to multiple languages, and mobile-friendly.

For the survey targeting individuals, Capital Metro coordinated with community-based organizations (CBOs) that work with LEP communities to respond to the survey. Capital Metro provided social media messaging to make it easy for CBO's to promote the survey in the targeted languages. The second survey was translated into Spanish, Hindi, Arabic, Chinese, Vietnamese, and Koren. Survey questions were drafted in English and a translation service was contracted to provide translations into these languages.

Survey Distribution

The survey was posted on online via SurveyMonkey.com. Capital Metro publicized and distributed the CBO survey to community-based organizations that serve people who speak different languages via email communication. Community-based organizations were provided

with three participation options. CBO's could ask staff to take the survey, host a community conversation with staff to allow time for open-ended questions and answers, and/or promote the translated individual survey with their community members. The translated individual survey was publicized via Capital Metro's social media channels and on the Capital Metro Title VI webpage. The English version of the individual survey was not publicized to allow feedback to come from directly from the targeted population. Both surveys were open from Wednesday, March 3rd – Friday, March 19th. Capital Metro provided grocery gift cards as an incentive to the community for their participation.

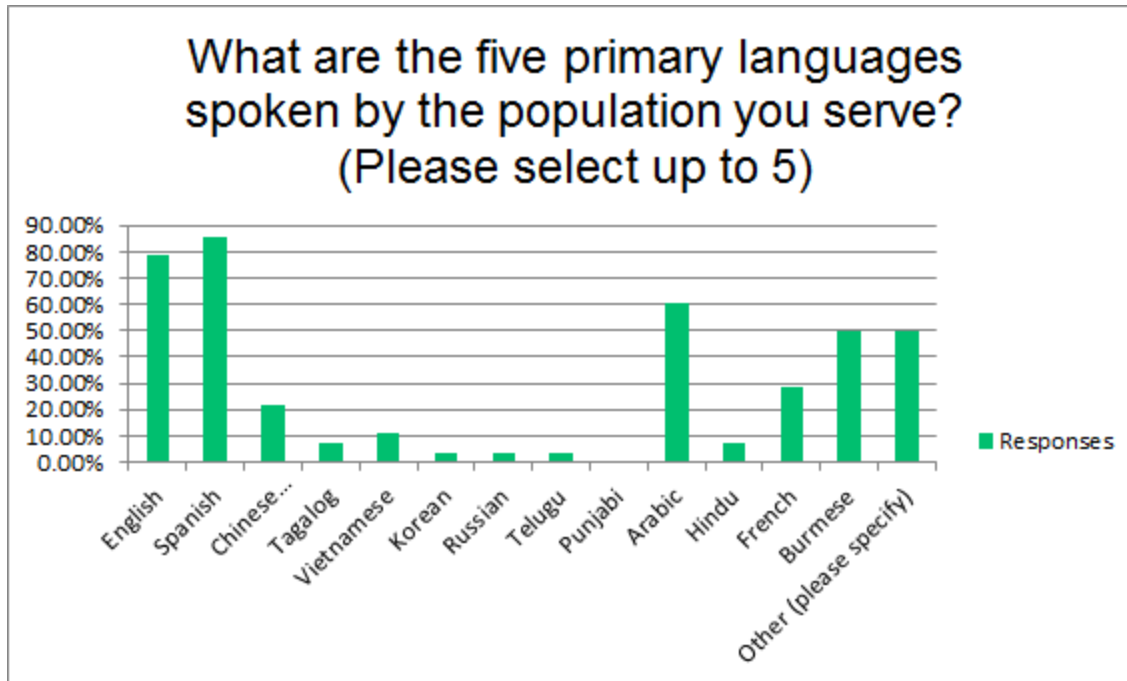
Survey Results:

Capital Metro developed two external surveys and hosted community conversations with community-based organizations. A total of 28 responses were received during the community-based organizational survey period. A total of 4 responses were received during the individual survey period for all translated surveys. Timeframe for the survey distribution was affected by the Winter Storm 2021 experienced in Texas. While an extension was offered to increase participation, the Winter Storm was a distraction. The public surveys aimed to identify:

- The languages Capital Metro is regularly interacting with.
- The frequency Capital Metro encounters individuals who speak each language.
- The importance of the Capital Metro service to the LEP customers.
- Methods for how Capital Metro can best to reach LEP communities in Central Texas (etc. in writing, verbally, or through an interpreter).

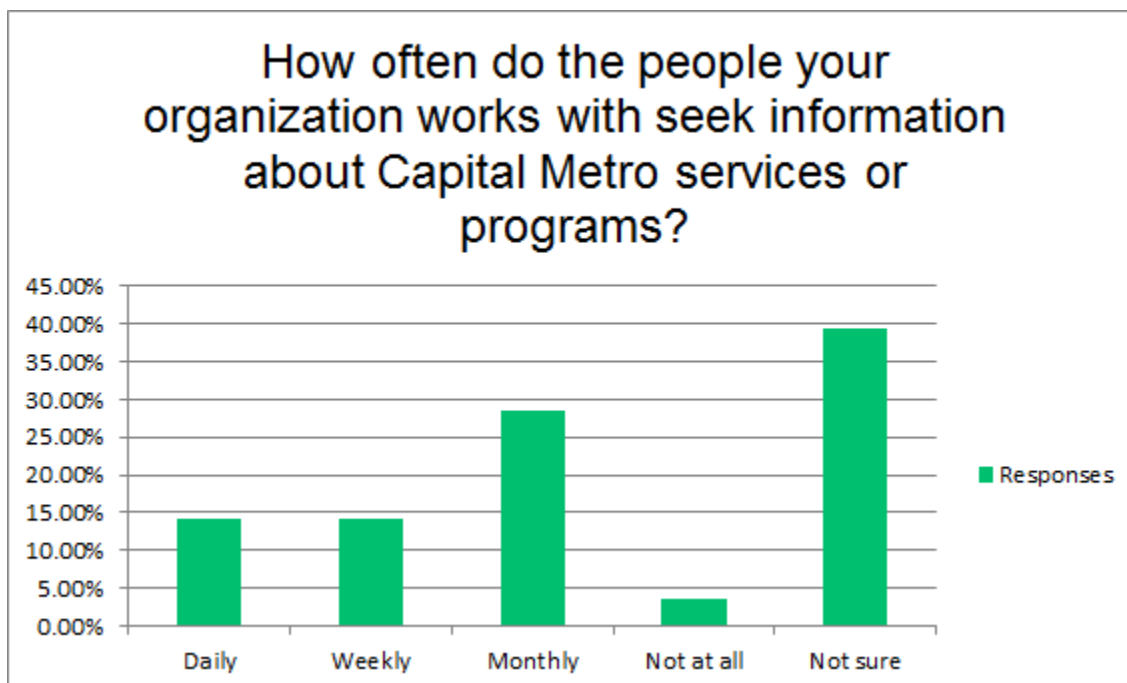
The survey found that respondents reported that Spanish is the language most often heard when interacting with their community members. Second language most often heard is English, third is Arabic, fourth is Burmese, fifth is French, and sixth is Chinese. The following languages had were selected by 1-3 respondents: Tagalog, Vietnamese, Korean, Russian, Telugu, and Hindi.

Figure 4: Languages Heard Most Often by Community-Based Organizations



The survey results showed that 82% (23) of respondents have had a community member inquire about how to access public transportation or expressed a need for public transportation service. This shows the importance of Capital Metro services to the LEP community. 60% of responded community members seek information about Capital Metro services or programs varying from daily, weekly, and monthly. 39% respondents said they were not sure how often community members sought Capital Metro services or programs.

Figure 2: Importance of Capital Metro services to LEP communities



Survey: Community-based organizations

Respondents recommended the following methods for how Capital Metro can best to reach LEP communities in Central Texas including having the website in different languages, having a language assistance line available to staff, in particular bus operators. Text messages sent in riders preferred language with general messaging such as “bus is running late” This generic messaging is better than no message at all. Additionally, training staff about the language assistance services available to them 8-10 times a year, with emphasis on frontline staff.

Survey Results: Individuals

Response from the individual translated service was low. The Spanish survey had 3 respondents and the Vietnamese survey had 1 respondent. All 4 respondents are users of Capital Metro services and are familiar with several services and programs including bus, train, PickUp, MetroBike, CARTS, Project Connect, Transit Store, Trip-planning, Transit Adventures, and Customer Service or Go Line.

No responses were received from the Arabic, Mandarin, Korean, and Hindi.

Title VI Program Update Public Involvement Summary: DDB

Stakeholder Outreach

Capital Metro used a community-based public involvement strategy to obtain input from stakeholders to inform the development of the Title VI Program Update by coordinating with institutions and community-based organizations to reach members in the low-income and minority community. Over 52 Community based organizations who serve and advocate for people who are in the low-income and minority community were identified as promotional partners for the public meetings. Community-based organizations were provided with a flyer in English and Spanish for promotional use and were invited to host an informational meeting with the same presentation information as the public meeting for their community. The purpose for this is to meet people where they are and have a captured audience when presenting the information. Presentations were offered in English and Spanish.

Promotional material went out on Monday, April 26th, 2021 for the first public meeting on Monday, May 3rd, 2021. Promotional material for the second public meeting went out to community-based organizations on Thursday, May 6th, 2021 which took place on Wednesday, May 19th, 2021. Based on the feedback from the community, Capital Metro extended the public comment period from May 24th, 2021 to June 28th, 2021. Promotional partners who responded with their commitment included: Council Member Fuente’s office, One Voice, The City of Austin Equity Office, The City of Austin Economic Development Department, Foundation Communities, Communities in Schools, Austin Voices, Dress for Success, Dove Springs Proud, Community Resiliency Trust, and Austin Public Health. One Voice hosted a nonprofit forum via zoom on Friday, April 30th at 10 am for their members and promoted this meeting with the community. The presentation material was in English as participants were staff members from nonprofits. A total of 13 nonprofits had staff in attendance including, Woollard Nichols & Associates, Transit Empowerment Fund, Reentry Roundtable, Central Texas Food Bank, In Home Care for Meals on Wheels, Community First Village, Travis County Healthy and Human Services Department, Community

Advisory Network, Any Baby Can, Goodwill of Central Texas, and Drive a Senior. Feedback from the nonprofit forum was that the wording is difficult to follow and that we needed a slide to explain DIDB further.

To reach Capital Metro riders, at-stop outreach was conducted at selected stops to reach members in the low-income and minority community. At-stop outreach was conducted to promote the public meetings the week of Monday, April 26th – Friday, April 30th. A total of 443 Capital Metro riders were reached at the selected stops. Outreach took place during the morning and afternoon peak hours.

Outreach Materials

- Development

A bilingual flyer in English and Spanish was designed to include information about the public meeting. The language used on the flyer were chosen to make it clear that low-income and minority populations were the target audience. Flyers were distributed both digitally and in paper format.

A powerpoint presentation was create to provide background on the Title VI Program, DIDB Policy, and explain the national standards for DIDB. The presentation was in English and Spanish.

- Example Figures

Public Meeting

- Capital Metro hosted two virtual public meetings about Title VI policy updates on Monday, May 3rd at 6 pm and Wednesday, May 19th, at 6:00 pm via zoom webinar. The meetings were hosted in English and Spanish. Attendees were able to register for the public meetings. Interpretation services were available upon request. For accessibility to those who did not register in advance, the meetings were streamed live on Capital Metro's Facebook page too. Close captioning was available in English. Live Spanish interpretation was available during the question and answer portion of the meeting. Meeting attendees could submit questions through the question and chat option in zoom, in the comment section of Facebook and YouTube, and to a phone line where a staff member could help take questions in English and Spanish.

The presentation provided background on the Title VI Program, DIDB Policy, and explain the national standards for DIDB. An email address was provided for participants to send comments during and after event. The virtual meeting was recorded and shared on social media to be viewed at any time.

The total number of registered participants for the meeting on Monday, May 3rd was 26. The total number of actual attendees was 3 on the zoom webinar. Participation on Facebook and Youtube had an average of 3 viewers, with a maximum of 9 at one point. Duration of the meeting was 41 minutes and 3 seconds. Questions and comments after this meeting presentation focused on what was the impact for accessibility for person with disabilities.

The total number of registered participants for the meeting on Wednesday, May 19th was #. The total number of actual attendees were 7 on the zoom webinar, 2 on Youtube and 7 on Facebook. Questions and comments after this meeting presentation focused on the program update threshold of 2% to 10% helps low-income and minorities. Specific question about routes and how this would help people who were impacted by Cap Remap were part of the conversation.

Question Report

2. Report on Virtual Meeting event location, date, time, the total number of participants, a summary, and the key themes from the feedback received.
3. Report on location, date, time of the public hearing, and a summary from the feedback received.
4. Report on location, date, time of the board meetings, and a summary from the feedback received.
5. Appendix: Marketing Materials
6. Appendix: Digital Marketing Records

- Example Figures

Public Hearing

- The public hearing took place on Wednesday May 12 at 12 p.m. Due to the COVID-19 pandemic, at this hearing Public Comment was allowed via telephone only. Advance registration was required via phone or email. Interested participants needed to give a name, email address and telephone number. The deadline to register was one business day in advance of the hearing (noon on Tuesday, May 11). Reasonable modifications and equal access to communications are provided upon request with at least two days notice in advance via phone or email. Two people signed up to comment.
- Example Figures

Board Meetings

- Development/Summary

FTA Coordination

- Summary

Appendix

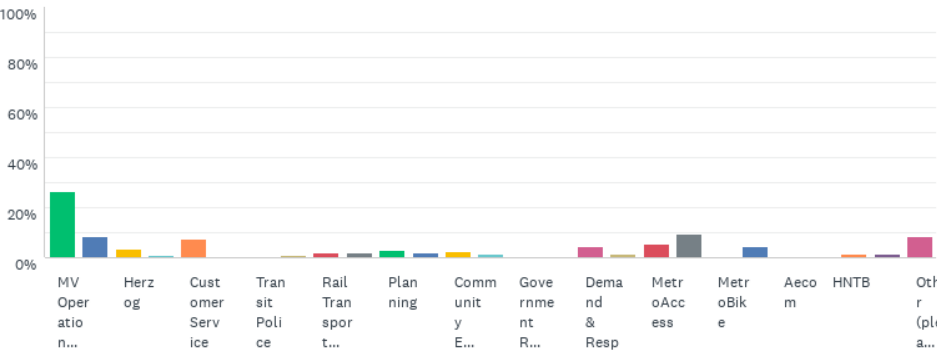
- Appendix K: All Digital Marketing Records

Appendix A

Appendix B

Question 1: Which organization/department do you work in?

Q1 Which organization/department do you work in?

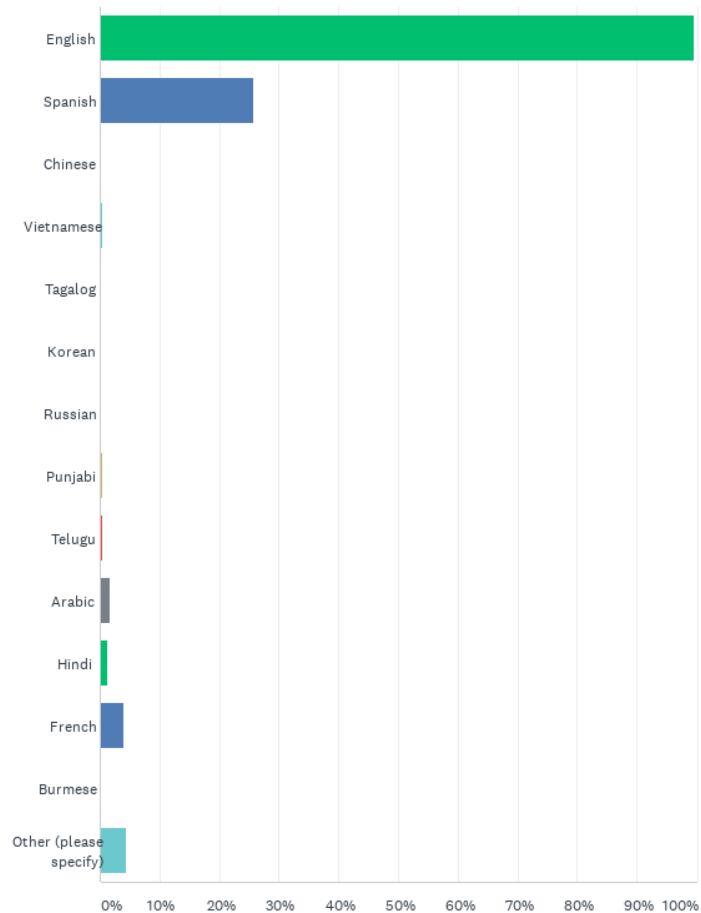


Q1 response summary:

There was a total of 229 respondents. The largest group of respondents were MV Operations/Bus Operators at a 27% response rate. Second highest response rate was from Operations and Maintenance at a 10% response rate, followed by Customer Service at 7% rate.

Question 2: Which languages do you speak? Please select the language(s).

Q2 Which languages do you speak? Please select the language(s).

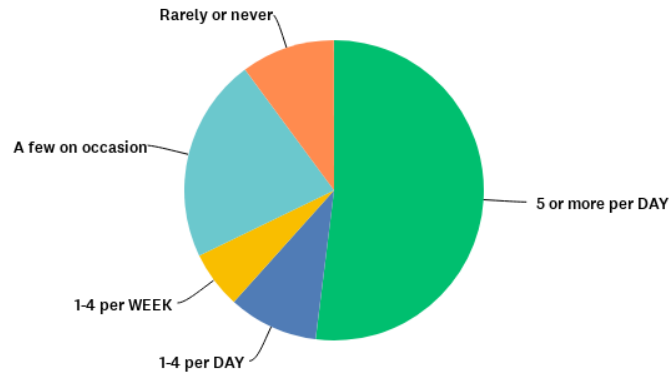


Q2 response summary:

All 229 respondents speak English. A total of 26% of the respondents speak Spanish, followed by 4% speaking French. There was a 4% response rate of people knowing a second language that were not listed as an option including Italian, sign-language, Yoruba, Igbo, Berber, Swahili, and Turkish.

Question 3: How many customers and/or members of the public do you interact with?
Please select one.

Q3 How many customers and/or members of the public do you interact with? Please select one.

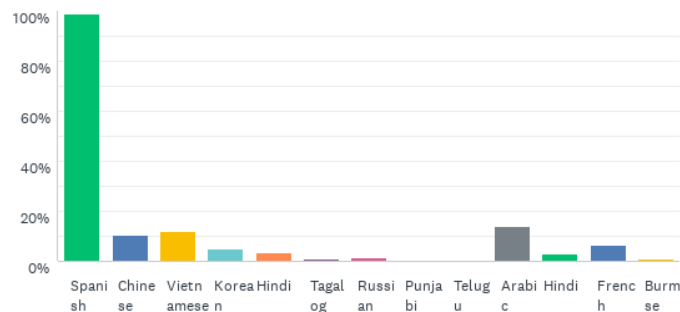


Q3 response summary:

A total of 227 respondents answered this question and two respondents skipped this questions. A total of 118 or 52% of the respondents interact with customers or members of the public who speak a different language other than English 5 or more times per day. A total of 50 or 22% of the respondents interact with customers or members of the public who speak a different language other than English a few on occasion.

Question 4: Besides English, what are the languages you hear most often by customers and/or members of the public you encounter? Please select all that apply.

Q4 Besides English, what are the languages you hear most often by customers and/or members of the public you encounter? Please select all that apply.

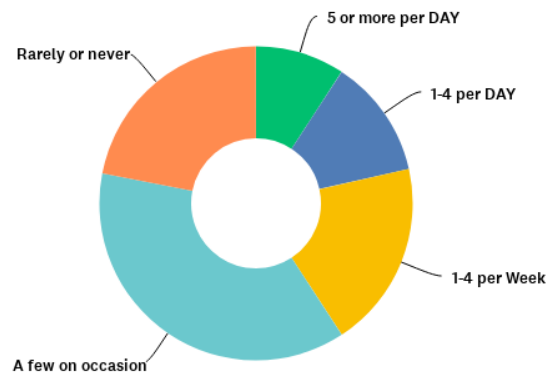


Q4 summary response:

A total of 218 survey participants responded and 11 skipped this question. Respondents selected Spanish as the language most often heard when interacting with customers or members of the public. Second language most often heard is Arabic, third is Vietnamese, and fourth is Chinese.

Question 5: How often do you usually encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in English? Please select one.

Q5 How often do you usually encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in English? Please select one.

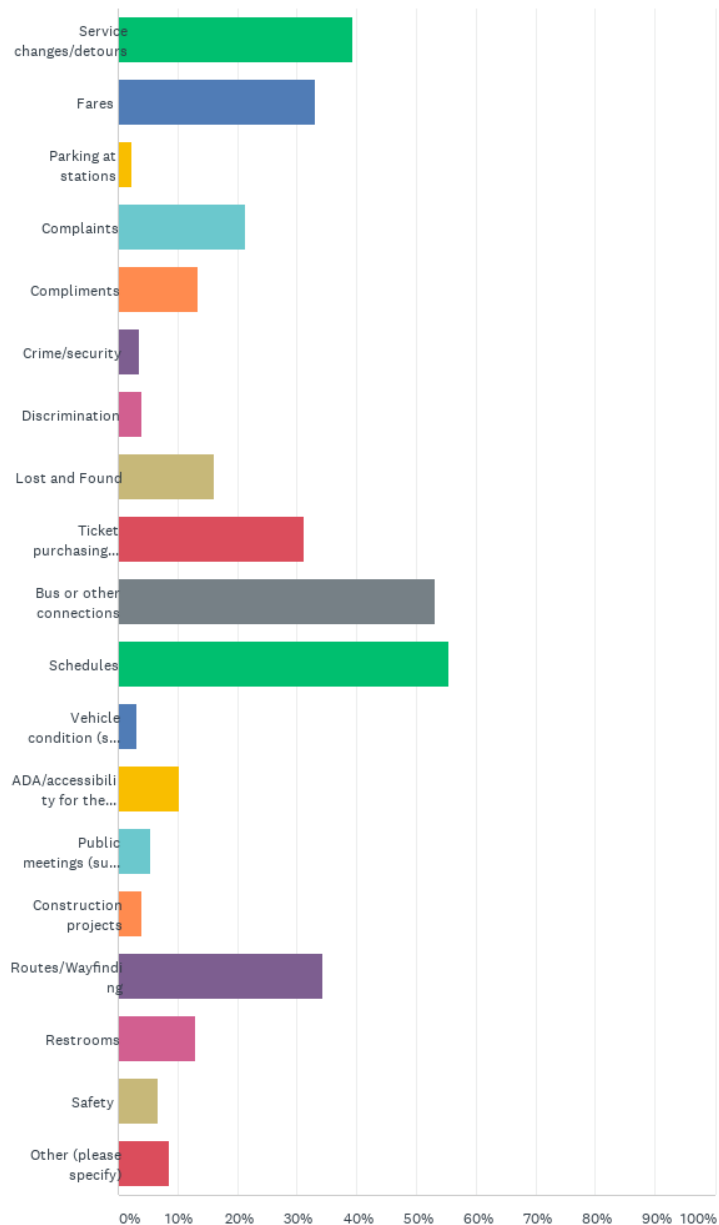


Q5 response summary:

There was total of 228 respondents and one person skipped this question. 40% (85) of respondents encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in English a few on occasion. 22% (50) people rarely or never encounter people seeking assistance in another language than English. 19% (44) respondents encounter people seeking assistance in another language than English 1-4 times a week.

Question 6: What information are those customers and/or members of the public usually seeking? Please select all that apply.

Q6 What information are those customers and/or members of the public usually seeking?
Please select all that apply.



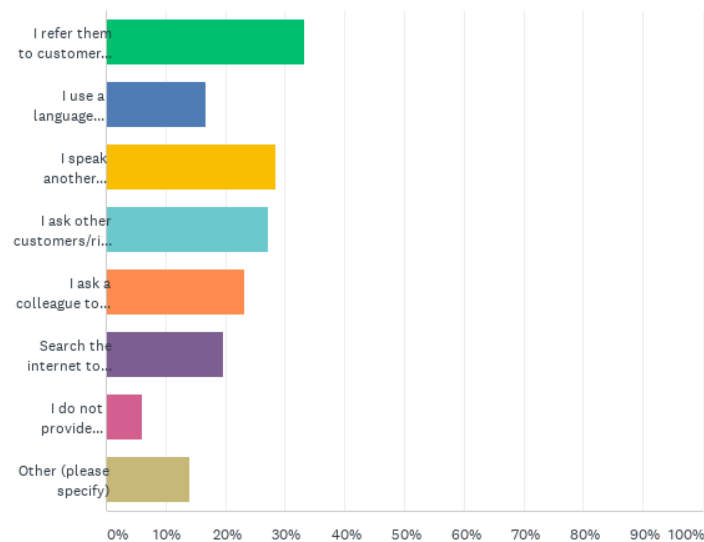
Q6 response summary:

A total of 224 individuals responded to this question and 5 people skipped this question. Respondents were asked to select all the options that applied to learn what information are those customers and/or members of the public usually seeking. A total of 124 selected schedules, 119 selected bus or other connections, 88 selected service change/detours, 77 selected routes/wayfinding, 74 selected fares and 70 lost and found, 48 selected complaints, and 30 compliments. All other items selected were lower than 29 and less. In the other

options, some recurring themes covered questions about MetroAccess and PickUp services, along with questions about routes and destinations. There was only one response regarding a question about contact tracing for COVID-19.

Question 7: How are you currently providing information to riders/customers of the public who are seeking assistance and are unable to communicate well in English? Please select all that apply.

Q7 How are you currently providing information to riders/customers of the public who are seeking assistance and are unable to communicate well in English? Please select all that apply.



Q7 response summary:

A total of 228 individuals responded to this question and 1 person skipped this question. Respondents were asked to select all the options that applied to learn how information is being provided to riders/customers of the public who are seeking assistance and are unable to communicate well in English. 76 respondents refer customers to customer service, 65 respondents speak another language and can directly answer questions if the customer is speaking the language they know. 62 respondents ask other customers/riders if someone can translate or interpret. 53 respondents ask a colleague to translate/interpret. 45 respondents use the internet translation. 38 respondents use the language assistance line. In the open ended answers, google translation was a recurring answer a tool used for language assistance.

Question 8: Are there any resources you need to help you assist you in communicating with customers? Please use the space below for suggestions to improve Capital Metro's communication or for any comments you may have. If you have a specific language in mind, please include it.

Q8 response summary:

A total of 145 respondents for this question and 84 skipped this question. A few themes for how Capital Metro can best reach Limited English Proficiency communities in Central Texas include these methods:

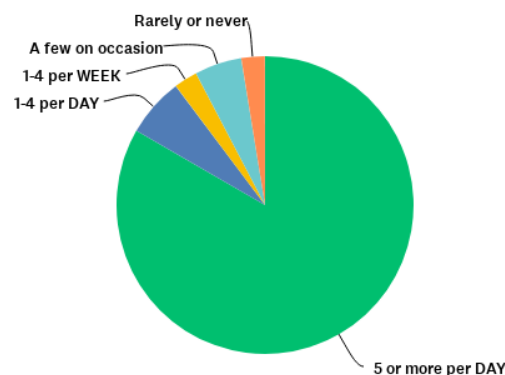
- Mobile Language Line
- Computer Aided Real Time Translation/
- Onboard system that's accessible in different languages
- Provide basic transit vocabulary to staff
- Include American Sign Language in all language plans and options

MV Operations and Customer Service results:

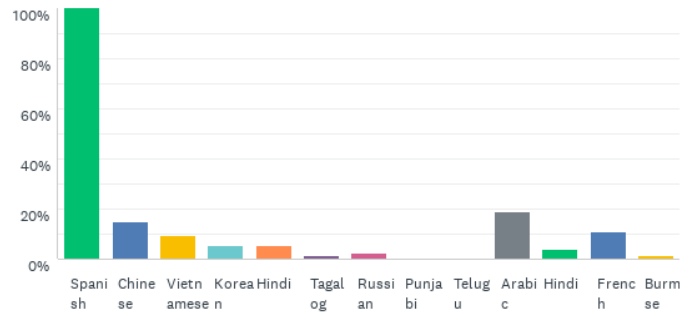
MV Bus Operators and Capital Metro Customer Service are the respondents who have the most public-facing interaction on a daily basis. To best serve the purpose of this survey, it was important to see if there was commonality in their experience.

Response Summary: 83% (65) respondents interact with customers and/or members of the public 5 or more per day. Respondents listed Spanish as the language most often heard by customers and/or members of the public, followed by Arabic, Chinese, and then Vietnamese. 29% of respondents encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in English 1-4 times a week, followed by 23% of respondents with 5 or more encounters per day. See figures below:

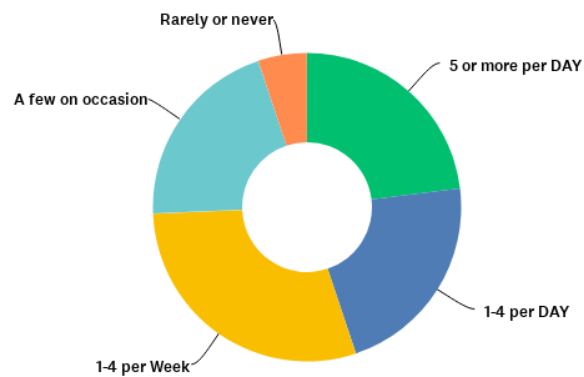
Q3 How many customers and/or members of the public do you interact with? Please select one.



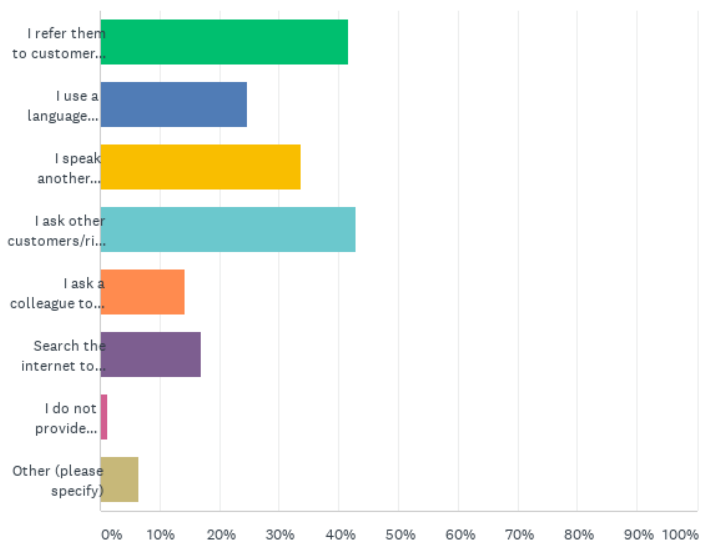
Q4 Besides English, what are the languages you hear most often by customers and/or members of the public you encounter? Please select all that apply.



Q5 How often do you usually encounter customers and/or members of the public who are seeking assistance and are unable to communicate well in English? Please select one.



Q7 How are you currently providing information to riders/customers of the public who are seeking assistance and are unable to communicate well in English? Please select all that apply.



Question 1:

Answer Choices	Responses	
MV Operations/Bus Operator	26.64%	61
MTM North/South	8.73%	20
Herzog	3.49%	8
Austin Transit Partnership	0.87%	2
Customer Service	7.42%	17
Central Control Facility Dispatcher	0.44%	1
Transit Police	0.00%	0
Security	0.87%	2
Rail Transportation	2.18%	5
Administration	2.18%	5
Planning	3.06%	7
Capital Projects	2.18%	5
Community Engagement	2.62%	6
Marketing and Communications	1.75%	4
Government Relations	0.44%	1
Legal	0.00%	0
Demand & Response	4.37%	10
People & Culture	1.31%	3

MetroAccess	5.68%	13
Operations & Maintenance	9.61%	22
MetroBike	0.00%	0
Information Technology	4.37%	10
Aecom	0.00%	0
Movitas Mobility	0.00%	0
HNTB	1.75%	4
Rifeline	1.31%	3
Other (please specify)	8.73%	20
	Answered	229
	Skipped	0

Other (please specify)
Internal Audit
Finance Dept Capital Metro
CMTA Property & Asset Management
Strategic Operations and Management
Transit Store
Finance
Risk & Safety
Finance
Procurement
Eligibility
Safety
Safety, Risk and Accessible Services
MTM Functional Assessment Contract
Real Estate
Property Asset Management
Finance
Safety
Transit Store
finance
Real Estate and Asset Management

Question 2:

Answer Choices	Responses	
English	99.56%	228

Spanish	25.76%	59
Chinese	0.00%	0
Vietnamese	0.44%	1
Tagalog	0.00%	0
Korean	0.00%	0
Russian	0.00%	0
Punjabi	0.44%	1
Telugu	0.44%	1
Arabic	1.75%	4
Hindi	1.31%	3
French	3.93%	9
Burmese	0.00%	0
Other (please specify)	4.37%	10
	Answered	229
	Skipped	0

4
Italian- some
Italian
little bit of sign
Yoruba
Igbo
Berber
Berber
Berber
Swahili
Turkish

Question 3:

Answer Choices	Responses	
5 or more per DAY	51.98%	118
1-4 per DAY	9.69%	22
1-4 per WEEK	6.17%	14
A few on occasion	22.03%	50
Rarely or never	10.13%	23
	Answered	227
	Skipped	2

Question 4:

Answer Choices	Responses	
Spanish	99.08%	216
Chinese	10.55%	23
Vietnamese	11.93%	26
Korean	5.05%	11
Hindi	3.67%	8
Tagalog	0.92%	2
Russian	1.38%	3
Punjabi	0.46%	1
Telugu	0.46%	1
Arabic	13.76%	30
Hindi	3.21%	7
French	6.42%	14
Burmese	0.92%	2
	Answered	218
	Skipped	11

Question 5:

Answer Choices	Responses	
5 or more per DAY	9.21%	21
1-4 per DAY	12.28%	28
1-4 per Week	19.30%	44
A few on occasion	37.28%	85
Rarely or never	21.93%	50
	Answered	228
	Skipped	1

Question 6:

Answer Choices	Responses	
Service changes/detours	39.29%	88
Fares	33.04%	74
Parking at stations	2.23%	5
Complaints	21.43%	48
Compliments	13.39%	30
Crime/security	3.57%	8
Discrimination	4.02%	9
Lost and Found	16.07%	36
Ticket purchasing instructions	31.25%	70

Bus or other connections	53.13%	11 9
Schedules	55.36%	12 4
Vehicle condition (such as broken equipment, cleanliness, etc.)	3.13%	7
ADA/accessibility for the disabled	10.27%	23
Public meetings (such as service or fare adjustment hearings, Board meetings, etc.)	5.36%	12
Construction projects	4.02%	9
Routes/Wayfinding	34.38%	77
Restrooms	12.95%	29
Safety	6.70%	15
Other (please specify)	8.48%	19
		22
	Answered	4
	Skipped	5

Other (please specify)
Benefits
Scheduling rides
Not sure
Booking ride to and from their destinations
How to use MetroAccess Services
Call to schedule rides or to cancel rides
General Information about MetroAccess Services; information about our App/purchasing tickets online; safety tethers for wheelchair securement
Scheduling trips with MetroAccess
COVID contact tracing messaging
MetroAccess services
new to this organization - no interactions yet due to Covid
None
For Cap Remap outreach, it was difficult to communicate with riders who did not speak English; most were Spanish speaking and many were hesitant to interact with us at all seeing us a "authority figures" that might question their immigration status.
How to get to where they want to go
Utilities crossing our Rail Line or those that have sidings on our Rail line to access freight or landowners with Private Crossings.
N/A
this was when i was working in a different department it is not my current experience
Asking for to expand the zones
Some have complained about waiting too long for PICK UP. Up to an hour wait sometimes. They are frustrated being late to work.

Question 7:

Answer Choices	Responses	
I refer them to customer service	33.33%	7
I use a language assistance line	16.67%	3
I speak another language.	28.51%	6
I ask other customers/riders if they can help translate/interpret	27.19%	6
I ask a colleague to translate/interpret	23.25%	5
Search the internet to translate.	19.74%	4
I do not provide information in anything other than English	6.14%	1
Other (please specify)	14.04%	3
	Answered	25
	Skipped	

Other (please specify)
I get by with a little Spanish
NA
If all fails I use hand gesture
I'm usually contacted by Spanish speakers
use phone to help via google maps, for example
visuals
Google translate and usually refer to customer service.
I use my hands a lot and do the best I can.
n/a
I am a cap metro rider myself. Knowledgeable of routes and bilingual so I can easily assist!
I usually provide information to spanish speaking customers
I speak Spanish and know how to use the CapMetro app so am able to help them plan/explain their route
Preparing materials in Spanish and providing Spanish translators
Write in English to answer question
I know little Spanish to assist.
I use Google Translate.
Spanish(not fluent) I am usually able to translate/interpret, other language we have a language line to contact
Try using a system map to have point out there destination!!!
N/A (so far)
Translate on phone
i speak a little spanish so i try and communicate the best i can (not fluent)
Rely on translators provided by community orgs
Understand some spoken languages
I do speak intermediate Spanish.
I speak to internal employees only
very little Spanish but manage to give response to meet need.
I have not encountered this
Point to what is needed.

Although I'm not fluent in Spanish, I can get by with the Spanglish I know.
I provide a schedule booklet
Write down names of locations. Body language...pointing directions...pointing out other names buses and route headways
Try to explain slowly

Question 8:

Answered	145
Skipped	84

Responses
Language class
The language line we use is a very helpful tool. Not only does it assist our team with our Spanish speaking customers, there are other languages on the language line to choose from as well if needed.
Shorter videos that are more engaging, technical descriptions of project connect tunnel and other engineering aspects of the project
Interpreters
various versions of materials
If y'all could provide the public with a system in they units that they can look up routes, times, weekend schedules and where in a language that they speak.
Google Translator
None
n/a
I am taking the Rosetta Stone training in Spanish provided by Metro. It is very helpful.
Sign language personnel
Not at this time
CMTA needs a basic transit vocabulary and easy phrases list for those of us that speak another language (e.g. Spanish). Something very simple. In addition a class on "conversation al-basic" is needed either internally or externally. I can assist.
N/a
N/A
update Cap Metro/ Metro Access website to include information for Spanish speakers or other predominate language on rider's guide, detours, closures etc...
Maybe lessons in different foreign languages. We try to make sure we send out people who speak the necessary languages to events but that isn't always the case.
maybe a translator App for the very few people that might use another language besides spanish.
N/A
None
NA

I often find a lot of refugees from African countries speaking various languages that I'm not familiar with usually looking for the Trinity Center Downton or For The City from paper work but I'm at a lost to direct them. I love the translate app if we could get a list of the various language for their region I would feel more able to assist them.
N/A
Language line is the only resource that I use to communication with non-English speaking clients
Language line works
I really don't know of any resources that could assist me.
Would it not be nice to have a transaltion app on the bus or operator could use?
no
N/A
not at this time
Would like to have sore translated material in Chinese.
On-demand translation services, especially for written and web documents.
No
None that I can think of
N/A
Ensuring that maps/rerouting is available in Spanish - either at stops, on buses or the app is important. Making sure route changes are communicated through avenues that will reach individuals that may have limited capability to communicate in English. Now that at-stop outreach may be limited, maybe having MetroAlerts go out in different languages, or sharing route changes on Facebook or in a Facebook group,
App with common questions and answers
No
Drivers should have a translator app on their tablets to use when they're unable to communicate with clients.
To know whether we have interpreters available in the most commonly spoken languages in our community
Translation app
Yes if we can use a translater app on our phones!!!
Farsi
Language line
Point customers to the Spanish version of the CapMetro.org website.
None that i can think of
I would like schedules to combine with my route because there are routes that don't meet at my destination
n/a
Basic word Chart translator.
When completing in office appointments/interviews I used the language line for any non-Spanish speakers. Most common is Vietnamese, Mandarin, occasional Tagalog.
Spanish is most u need to communicate with
Maybe have have more than just English n Spanish come over the intercom n more pamphlets on the bus. To show more of diversity among capital metro. Because it is more than Hispanics, caucasian and African-American passengers. We need to be able to assist everyone in the community.

None
mobile language line
No
Cool to have on board lang translate
Translator device on buses would be nice
I have a booklet that Capital Metro gave me with the basic words of Spanish that I use so that's only resource I have gnats good enough thank you
Online language learning resources.
None
n/a
Make sure ALL the lecturer is in different languages. Make sure the announcements are in different languages also, and working. Maybe Supervisor can take some classes too. I know it was offered but hear nothing else about it.
More Spanish and other languages available for online learning
No
Quicker response from customer service
None
google translate works for me and some smart phones will take photos of signs and translate them which can help many people.
Would like to take a sign language class.
Would like to learn Spanish.
We also use text/whiteboards for individuals that are deaf/hearing impaired. We also utilize a lot of in-person sign language interpreters with our eligibility process.
Need to learn Spanish
Maybe a computer based program as well as a language line. I think having more than one option would be a good idea.
Language line. Someone familiar with assistive accommodating devices such as screen readers etc.
no
In Europe the busses speak more then 2 languages just like at the airport so maybe we should look to having our AVA system speak more then one language
Spanish
I would like to brush up on Spanish so that I can directly answer questions. CMTA should encourage us to take Spanish or other languages.
n/a
More languages in the cap metro maps
Just listen to them
Translator available over the radio
Can't think of anything
Instruction in spanish
The internet is great for translating, but I have to get off the bus to look it up. Maybe a translation book for Spanish which is most often the language to translate.
Taking a course to brush up on my Spanish would be a great tool to assist customer s.
None
I speak different languages and i understand foreign cultures

To have a Spanish or sign language class
No
The Language Line. Forward call to a bilingual rep. We could use resources to learn to speak Spanish to customers. It would be just basic language skills to ask people to hold and to wait for the translator.
I would like to go back to school to re-learn Spanish.
Language options at Bus stops-example customer could use enunciator in native language at Metro Rapid and Metro Rail stations.
None
n/a
no the language line is very useful
Customer Care offers the Language line
Can't think of any at this time
none
Having Cap Metro App in other languages would be helpful.
It would be nice to have a card with pre printed information for most asked questions in English and Spanish. This way I/we could assist the passengers better.
Spanish and Basic Sign Language
Need to include ASL - American Sign Language just as any other language as well as interpreter services and CART - computer aided real time translation as other languages/forms of communication.
language board with examples so a non-English speaker can find their language and point, and an English speaker can know what language/s to use to help them.
Having the Go Line written on most signage is very helpful. Sometimes I forget the number, but it is usually right there on the bus stop sign.
No additional resources needed that aren't already publicly available. Google Translate has been a useful tool.
If Capmetro website supports transforming Web pages into audio that may help. At least for top 3 to 5 languages and the top service functions
Yes the language line is helpful.
None
No
The Language Assistance line is a very good tool.
no comments
N/A
I've been taking Spanish classes for a couple years, paid by the agency. They're super helpful and I recommend the agency have other staff members take these classes too. In Spanish, Vietnamese, Chinese, etc.
all is good. I would use the metro app and show them visually and let them know what unit they need.
I speak Spanish but sometimes don't have all the information customers need. It would be helpful to know I am referring/transferring customer to a Spanish speaker.
na
none
N/A

Language of patience.
None
I think that Cap Metro need more bilingual personal.
MDT need and updated with specific tools for operators to communicate in spanish.
Maybe some pamphlets in different languages
A hand held translator would be nice. Just put the announcements on the train in more languages.
Add language app on the tablets
Braille reading classes and other classes to help!
There should be a Capital Metro dispatcher who speaks/understands Spanish available at all times.
Some of the info should be in a localized place and all drivers should be aware of it to tell clients.
Have translator on phone
Rosetta stone, Duo Lingo, and Basic Spanish for Transit Employees
Translator
Tranlation booklet
No, some of my Spanish speaking customers also can get by with their somewhat English. We can get our point across usually.
N/A
I believe that much is being done to assist, and more could be done to assure the assistance is be heard on every bus.
Yes, schedule booklets and pamphlets which are in other community languages spoken in the respective service regions.
No
Maybe a different layout of the bus system map. More information on the pocket schedules.
No
No
No
No
Being able to learn spanish
None that I can think of
There should be more stops in the routes
More info that I can Refer to. I didnt Know there was a language line. We need maps in other languages.
They can hire more people who speak foreign languages.

Appendix C

Community Conversation Q1: *Do you have any suggestions for communicating with your population? (Please be as specific as possible.)*

AISD Refugee Family Support Office. Meeting with Salimah Shamsuddin on Tuesday, March 23rd at 2:30 pm.

Translated surveys: we can't just copy and paste translations. They need to upload from a pdf because if not translation may be backwards. There are languages that read right to left.

Reach out to community leaders when you have information to give out. Connecting with them is possible through Refugee Roundtable.

AISD Office of Translation and Interpretation. Meeting with Jennifer Williams, Language Support Coordinator on Wednesday, March 31st at 2:00 pm.

- Most parents served are Spanish speaking. 7 additional languages recently added is Arabic, Vietnamese, Burmese, Pashto, Swahili, Dari, and Kinyarwanda. If African and Arabic interpreters are hard to find, at least translate into one.
- All information is always go in Spanish and English.
- Refugee families have different needs than Spanish speaking families. For refugee is only crucial information that is needed to know about AISD and resources.
- When it comes to translation we have to respect the register of the translation. We are trying to make it under stable in English at 8th grade level. The English needs to be clear, concise and at an 8th grade level. Avoid being wordy.
- Spanish written translation is done in-house. Helps with agreeing on word meanings. 20 approved vendors. Masterword is one of them, available 24 hours, with most languages for the prices. American International Translators is another. Owner is local, small business and is very responsive. Really useful for last minute request. Language USA is responsive and work well with longer projects. Able to translate PDF's.
- Interpretation: AIT is a good local vendors, helped with getting equipment to a location. Simultaneous interpretation if you can get equipment to public. For consecutive, meetings are longer.
- Burmese is really hard to translate. You need to have a Burmese font downloaded on keyboard. If you have a translation need always send in a PDF because word format will change the translation. Ask community organization who have an interpreter available to review. For surveys, have interpreter input the survey directly onto website to avoid issues with cut and paste.

Community Conversation Q2: How is Capital Metro currently communicating with the people you work with in regards to explaining access to services and communicating how to navigate the transit system?

AISD Refugee Family Support Office. Meeting with Salimah Shamsuddin on Tuesday, March 23rd at 2:30 pm.

Not sure how CapMetro is working with clients. But she gives them bus passes.

AIISD Office of Translation and Interpretation. Meeting with Jennifer Williams, Language Support Coordinator on Wednesday, March 31st at 2:00 pm.

N/A. Her department doesn't work directly with families. Kids ride free is helpful

Community Conversation Q3: Which public agencies – transit or other – do you think do a particularly good job of reaching your community? Why?

AIISD Refugee Family Support Office. Meeting with Salimah Shamsuddin on Tuesday, March 23rd at 2:30 pm.

Refugee Resettlement Services – translate all forms are in other languages, diverse staff. AIISD has website is in different languages. Language Line Solutions with 24/7 access. Teachers use it to call to parents. They are a pricey, but they are a good vendor because they are 24/7. AIISD sends text messages can be in their preferred language. School messenger is the platform used for this. But would need to have employees who can speak the language to record the message. It would be good to have some generic messaging to send out in different language like "Bus is running late" so that at least people know. Once you have tools in place, agency needs to do an employee training so everyone knows about the service and best practices. Salimah recommends training take place 8-10 times a year, include as part of new employee orientation too. Training should be for frontline and admin.

Austin Public Health Job and Community Clinics do a good job.

AIISD Office of Translation and Interpretation. Meeting with Jennifer Williams, Language Support Coordinator on Wednesday, March 31st at 2:00 pm.

The City of Austin – Houmma Garba. Who they look to when needing to provide translation in other languages than Spanish.

Community Conversation Q4: How well generally does your community read in their native language?

- Below basic
- Basic
- Intermediate
- Proficient
- Not sure

Q4 Summary Response: Respondents did not answer this question because they did not feel comfortable generalizing their community members into one question.

Community Conversation Q5: Question to Ask in CBO Conversation: How well do they read in English?
N/A

- Below basic
- Basic
- Intermediate
- Proficient
- Not sure

Q5 Summary Response: Respondents did not answer this question because they did not feel comfortable generalizing their community members into one question.

Appendix D

External Survey Results – Community-based organizations

Question 1: Organization Name

Answered	28
Skipped	0

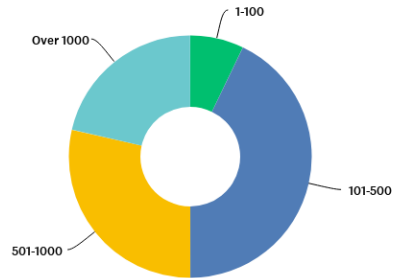
Q1 response summary: The public involvement included outreach to fifty contacts in thirty-two community-based organizations. A total of 28 respondents from eight organizations included:

Workers Defense Project
Austin Independent School District
Refugee Services of Texas
East Austin College Prep
Caritas of Austin
SAFE Alliance – Family Shelter
Greater Austin Black Chamber of Commerce
Greater Austin Asian Chamber of Commerce

Question 2: How many people were served by your organization?

Answer Choices	Responses	
1-100	7.14%	2
101-500	42.86%	12
501-1000	28.57%	8
Over 1000	21.43%	6
	Answered	28
	Skipped	0

Q2 How many people are served by your organization?

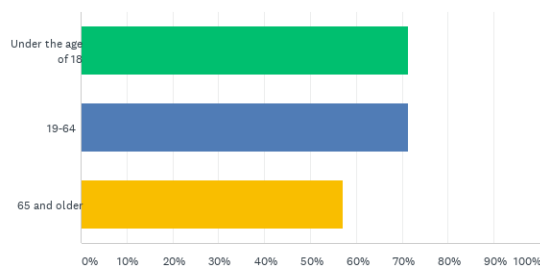


Q2 response summary: A total of twenty-eight individuals responded. Twelve organizations served 101-500 people, eight served 501-1000 people, six served over 1000 people, and two served 1-100 people.

Question 3: What age groups do you serve? (Please check all that apply)

Answer Choices	Responses	
Under the age of 18	71.43%	20
19-64	71.43%	20
65 and older	57.14%	16
	Answered	28
	Skipped	0

Q3 What age groups do you serve? (Please check all that apply)

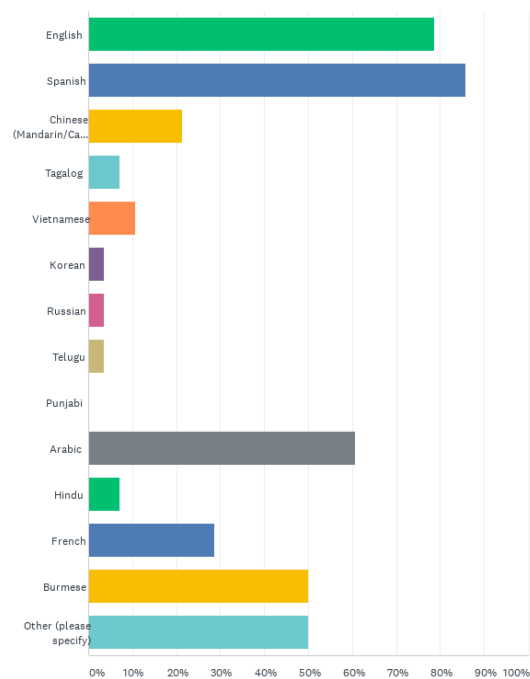


Q3 response summary: Twenty respondents listed their organization as serving youth under the age of 18, twenty respondents listed their organization as serving people aged between 19-64, and sixteen respondents listed their organization as serving people aged 65 and older.

Question 4: What are the five primary languages spoken by the population you serve?
(Please select up to 5)

Answer Choices	Responses	
English	78.57%	22
Spanish	85.71%	24
Chinese (Mandarin/Catonese)	21.43%	6
Tagalog	7.14%	2
Vietnamese	10.71%	3
Korean	3.57%	1
Russian	3.57%	1
Telugu	3.57%	1
Punjabi	0.00%	0
Arabic	60.71%	17
Hindu	7.14%	2
French	28.57%	8
Burmese	50.00%	14
Other (please specify)	50.00%	14
	Answered	28
	Skipped	0

Q4 What are the five primary languages spoken by the population you serve? (Please select up to 5)

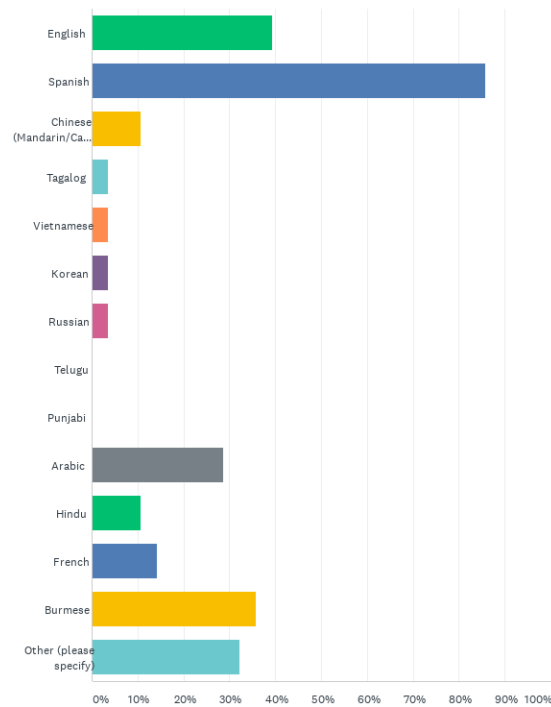


Q4 response summary: The top 5 languages spoken by the people the organizations serve are listed in the following order: Spanish (24 respondents), English (22 respondents), Arabic (17 respondents), Burmese (14 respondents), and other (14 respondents). In the other category, the languages listed included Dari, Pashto, Swahili, Kinyarwanda, Farsi, Kurdish, Persian, Urdu, Creole, American Sign Language, Tigrinya, Somali, Thai, and Yoruba. The remaining languages listed had responses ranging 0-8.

Q5: Which languages do you typically translate to provide information to your community?

Answer Choices	Responses	
English	39.29%	11
Spanish	85.71%	24
Chinese (Mandarin/Catonese)	10.71%	3
Tagalog	3.57%	1
Vietnamese	3.57%	1
Korean	3.57%	1
Russian	3.57%	1
Telugu	0.00%	0
Punjabi	0.00%	0
Arabic	28.57%	8
Hindu	10.71%	3
French	14.29%	4
Burmese	35.71%	10
Other (please specify)	32.14%	9
	Answered	28
	Skipped	0

Q5 Which languages do you typically translate to provide information to your community?

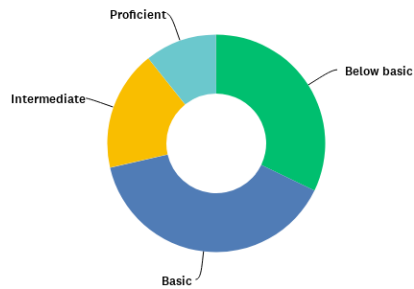


Q5 response summary: English was listed as the second highest language that information is translated into, however for the purpose of this summary, we will focus on the non-English languages. The top five languages other than English that information is translated into are Spanish (24 respondents), Burmese (10), Other (9), Arabic (8), and French (4). In the other category, the languages listed included Dari, Pashto, Swahili, and Kinyarwanda. The remaining languages had respondents from 0-3.

Question 6: How well do your clients or constituents speak English?

Answer Choices	Responses	
Below basic	32.14%	9
Basic	39.29%	11
Intermediate	17.86%	5
Proficient	10.71%	3
Not Sure	0.00%	0
	Answered	28
	Skipped	0

Q6 How well do your clients or constituents speak English?

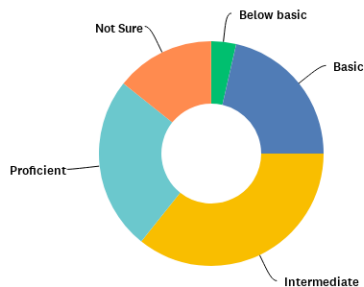


Q6 summary response: Eleven respondents said their clients or constituents speak English basic, nine said below basic, five intermediate, and three proficient.

Question 7: In general, how well does your community read in their native language?

Answer Choices	Responses	
Below basic	3.57%	1
Basic	21.43%	6
Intermediate	35.71%	10
Proficient	25.00%	7
Not Sure	14.29%	4
	Answered	28
	Skipped	0

Q7 In general, how well does your community read in their native language?

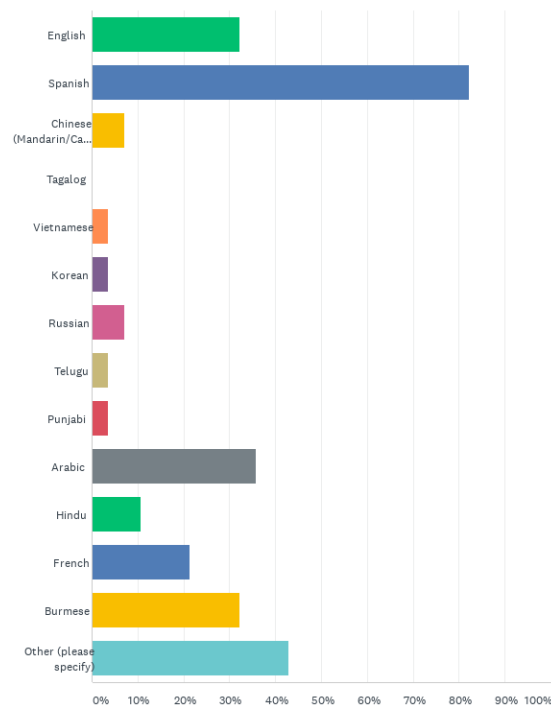


Q7 summary response: A total of 10 respondents said their community read at an intermediate level in their native language, 7 respondents said they read at a proficient level, six said below basic, four were not sure, and one said below basic.

Question 8: Which languages do you use interpreters for when hosting live or virtual events with your community?

Answer Choices	Responses	
English	32.14%	9
Spanish	82.14%	23
Chinese (Mandarin/Catonese)	7.14%	2
Tagalog	0.00%	0
Vietnamese	3.57%	1
Korean	3.57%	1
Russian	7.14%	2
Telugu	3.57%	1
Punjabi	3.57%	1
Arabic	35.71%	10
Hindu	10.71%	3
French	21.43%	6
Burmese	32.14%	9
Other (please specify)	42.86%	12
	Answered	28
	Skipped	0

Q8 Which languages do you use interpreters for when hosting live or virtual events with your community?



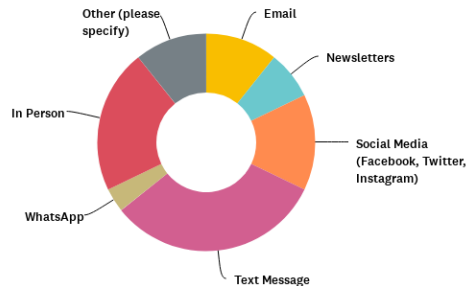
Q8 summary response: The top 5 languages community-based organizations hire interpreters for when hosting a live or virtual event with the community are listed as follows: Spanish (23 respondents), Other (12 respondents), Arabic (10 respondents), Burmese (9 respondents), French (6 respondents). English received 9 respondents but is not listed in the top five to best serve the purpose of this analysis. The languages listed in the other category include Dari, Pashto, Kinyarwanda, and Swahili.

Question 9: What is the preferred method of communication for your community?

Answer Choices	Responses	
Radio	0.00%	0
TV	0.00%	0
Email	10.71%	3
Newsletters	7.14%	2
Social Media (Facebook, Twitter, Instagram)	14.29%	4
Print Media	0.00%	0
Text Message	32.14%	9
WhatsApp	3.57%	1
In Person	21.43%	6
Other (please specify)	10.71%	3

	Answered	28
	Skipped	0

Q9 What is the preferred method of communication for your community?

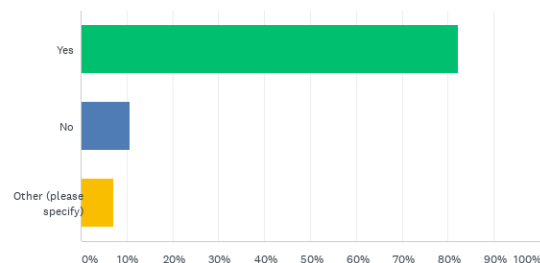


Q9 summary response: The preferred method of communication were listed in the following order: text message (9 respondents), in person (6 respondents), social media (4 respondents), other (3 respondents), newsletters (2 respondents), and WhatsApp (1 respondent). In the other category, 3 respondents listed phone calls.

Question 10: Has anyone your organization works with inquired about how to access public transportation or expressed a need for public transportation service?

Answer Choices	Responses	
Yes	82.14%	23
No	10.71%	3
Other (please specify)	7.14%	2
	Answered	28
	Skipped	0

Q10 Has anyone your organization works with inquired about how to access public transportation or expressed a need for public transportation service?

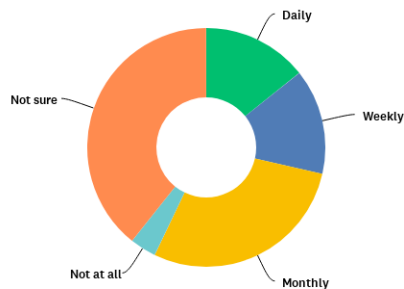


Q10 summary response: A total of 23 respondents said someone in their organization inquired about public transportation services, 3 respondents said no, and 2 respondents listed other. In the other category, respondents said they did not know.

Question 11: How often do the people your organization works with seek information about Capital Metro services or programs?

Answer Choices	Responses	
Daily	14.29%	4
Weekly	14.29%	4
Monthly	28.57%	8
Not at all	3.57%	1
Not sure	39.29%	11
	Answered	28
	Skipped	0

Q11 How often do the people your organization works with seek information about Capital Metro services or programs?

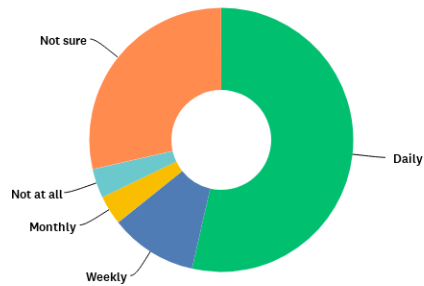


Q11 summary response: A total of 11 respondents said they were not sure how often people in their organization seek information about Capital Metro services or programs, 8 respondents said monthly, 4 respondents said daily, 4 respondents said weekly, and 1 respondent said not at all.

Question 12: How much do the people your organization works with use Capital Metro services to get around?

Answer Choices	Responses	
Daily	53.57%	15
Weekly	10.71%	3
Monthly	3.57%	1
Not at all	3.57%	1
Not sure	28.57%	8
	Answered	28
	Skipped	0

Q12 How much do the people your organization works with use Capital Metro services to get around?

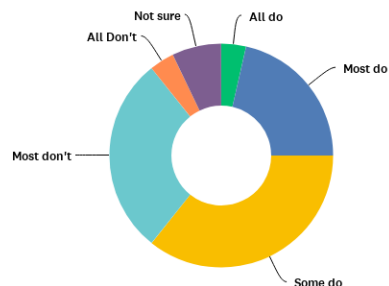


Q12 summary response: A total of 15 respondents said people in their organization use Capital Metro services to get around, 8 respondents said they were not sure, 3 respondents said weekly, 1 respondent said monthly, and 1 respondent said not at all.

Question 13: Do the people your organization works with have a vehicle available to them?

Answer Choices	Responses	
All do	3.57%	1
Most do	21.43%	6
Some do	35.71%	10
Most don't	28.57%	8
All Don't	3.57%	1
Not sure	7.14%	2
	Answered	28
	Skipped	0

Q13 Do the people your organization works with have a vehicle available to them?



Q13 summary response: A total of 10 respondents said some people in their organization have a vehicle available to them, 8 respondents said most don't, 6 respondents said most do, 2 respondents said not sure, 1 respondent said all do, and 1 respondent said all don't.

Appendix E

External Survey Results – Translated Surveys into Spanish, Hindi, Arabic, Vietnamese, Korean, and Chinese

No responses from the Mandarin, Hindi, Arabic, Korean surveys.

Question 1: Select your age group?

Q1 summary response: A total of 4 responses from individuals, 3 responded to the Spanish survey and 1 from the Vietnamese survey. All 4 respondents were between 19-64 years of age.

Question 2: What is your zip code?

Q2 summary response: 3 respondents from the Spanish translated survey were from 78748, 78750, and 78702, and the 1 respondent from the Vietnamese survey was from 78642.

Questions 3: How often do you ride Capital Metro to get around?

Q3 summary response: Each of the 3 Spanish survey respondents answered 3 different options including 6 to 7 days a week, 5 days a week, and never. The respondent from the Vietnamese survey responded 1 to 2 days a month.

Question 4: Which Capital Metro service(s) do you use? Select all that apply?

Q4 summary response: 2 of the Spanish survey respondents answered they use the bus, 1 respondent answered MetroBike. The respondent from the Vietnamese survey answered train.

Question 5: Which language(s) do you speak at home other than English?

Q5 summary response: The 3 Spanish survey respondents answered they speak Spanish at home, The Vietnamese respondent answered Vietnamese. No other languages were selected.

Question 6: How well do you speak English?

Q6 summary response: All 3 Spanish survey respondents answered they speak English very well. The Vietnamese respondent answered very well too.

Question 7: Does Capital Metro currently communicate with you in a language you know?

Q7 summary response: The 3 Spanish survey respondents answered yes, Capital Metro communicates with them in a language they know. The Vietnamese respondent answered no, Capital Metro does not communicate with them in a language they know.

Question 8: Have you heard of any of these Capital Metro Services and Programs? (Select all that apply)

Q8 summary response: The 3 Spanish survey respondents answered bus, then the following services and programs had 1 selection for the following options train, PickUp, MetroBike, CARTS, and Project Connect. The Vietnamese respondent selected all options available including bus, rail, MetroAccess, PickUp, MetroBike, MetroRideShare, CARTS, Project Connect, Transit Store, Trip-planning, Transit Adventures, and Customer Service or Go Line.

Question 9: Do you currently receive notices and news from Capital Metro?

Q9 summary response: 2 of the Spanish survey respondents said no, they do not receive notices and news from Capital Metro, 1 Spanish survey respondent said yes, they did. The Vietnamese survey respondents answered yes.

Question 10: Are these notices in English or other languages?

Q10 summary response: 2 of the Spanish survey respondents said their notices were in English, 1 skipped the question. The Vietnamese respondent responded other.

Question 11: Do you ever attend meetings sponsored by Capital Metro?

Q11 summary response: 2 of the Spanish survey respondents said yes, they did attend Capital Metro sponsored meetings and 1 Spanish survey respondent no. The Vietnamese survey respondent answered not sure.

Question 12: What is your preferred method of communication? (Please rank your top 3.)

Q12 summary response: 1 Spanish survey respondent selected email as their preferred method of communication, two Spanish survey respondents selected social media (Facebook, Twitter, and Instagram). The Vietnamese respondent selected email.

Question 13: Is there anything Capital Metro can do to communicate better with you? (Please be as specific as possible.)

Q13 summary response: There were no additional comments from any of the survey respondents to this question.



MEMORANDUM

To: Capital Metro Board of Directors

CC: Diversity and Compliance

From: Sharmila Mukherjee, Executive Vice President, Planning & Development

Date: June 17, 2021

Subject: Title VI Service Monitoring Program

Introduction

Federal Transit Administration (FTA) Circular 4702.1B requires providers of public transportation that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more to monitor the performance of their transit system relative to their system-wide service standards and policies at least once every three years. Capital Metropolitan Transportation Authority (Capital Metro) meets this threshold and monitors its service every three years.

The FTA service monitoring program requires transit agencies to monitor the performance of minority routes compared to non-minority routes against their service standards. The FTA requires agencies to monitor:

1. Vehicle Load standard
2. Vehicle Frequency standard
3. On-Time Performance standard
4. Service Availability standard
5. Transit Amenities policy
6. Vehicle Assignment policy

Capital Metro's service monitoring process has two steps:

1. Determine minority routes
2. Assess the performance of each selected route compared to the board approved Service Guidelines and Standards

Classification of Routes

The first step was to classify routes as minority and non-minority. A minority transit route is defined as one in which at least one-third of the revenue miles are located in a Census block group where the percentage of minority population exceeds the Capital Metro defined minority population threshold (50%). Using Census data, Planning determined that 48 of Capital Metro's 70 routes¹ are classified as minority routes.

¹ Routes 50, 51, 150, 152 are Round Rock routes and Capital Metro is not responsible for their Title VI since Round Rock is a direct recipient. Routes 214, 410, 411, 412, 490, 491, 492, and 493 are exempt from service

Capital Metro chose to monitor all of its routes. This provides a greater level of precision by avoiding “luck of the draw” issues if a random sample is used. Luck of the draw means that if good performing routes are selected the results will be more positive. If poor performing routes are selected, the results will be more negative.

The following sections assess the performance of minority routes to non-minority routes using Capital Metro’s Service Guidelines and Standards². All analysis used February 2020 data. Capital Metro chose February 2020 since this is the last month with full system operation and ridership prior to the impacts of the COVID-19 pandemic.

Vehicle Load

Load factor is the ratio of passengers to total seated capacity. Capital Metro’s Service Standards state that the load factor should not exceed the following percentages:

- Express/Flyer routes: 100% of seated load during peak and off-peak hours
- All other routes: 140% of seated load during peak hours and 120% during off-peak hours

An analysis of February 2020 ridership data showed that:

- Neither minority nor non-minority routes exceed service standard
- Minority routes have larger loads in the midday compared to non-minority routes.
- Minority routes have more ridership and therefore have a higher load factor.

Average Performance	Average Peak Load Factor	Average Standard	Average Midday Load Factor	Average Midday Standard
Minority Routes	.30	1.30	.35	1.15
Non-Minority Routes	.30	1.30	.27	1.15

Vehicle Frequency

Vehicle frequency describes how often a bus passes by a bus stop during an hour.

An Analysis of February 2020 ridership data showed that:

- Neither minority or non-minority routes exceed service standard
- Minority routes a less frequent than non-minority routes during the midday,
- Capital Metro recently increased frequency on five minority routes: 1, 7, 10, 20, & 300. This will improve the performance of minority routes compared to non-minority routes.

monitoring due to their operating characteristics. Route 214 is contracted and does not have load factor data. Routes 410, 411, and 412 are OTP exempt. Routes 490, 491, 492, and 493 are senior shopping routes that only operate one day per week.

² http://capmetro.org/uploadedFiles/Capmetroorg/About_Us/Service_Changes/capital-metro_service-guidelines-and-standards.pdf

Average Performance	Average Peak Frequency	Average Standard	Average Midday Frequency	Average Midday Standard	Average Night Frequency	Average Standard	Average Weekend Frequency	Average Weekend Standard
Minority Routes	22.7	22.9	32.3	38.3	37.1	40	32.8	48
Non-Minority Routes	21.2	22.9	28.5	38.3	32.5	40	27.5	48

On-Time Performance

Capital Metro considers buses on-time if they depart a designated timepoint between 0 seconds earlier and 6 minutes later than scheduled. System-wide on-time performance (OTP) should exceed 82%. Capital Metro's overall OTP is 81.5%.

An Analysis of February 2020 ridership data showed that:

- Both minority and non-minority routes fail to meet Capital Metro's OTP standard.
- Minority routes perform worse than non-minority routes.

Average Performance	Average Peak Load Factor	Average Standard
Minority Routes	70%	82%
Non-Minority Routes	74%	82%

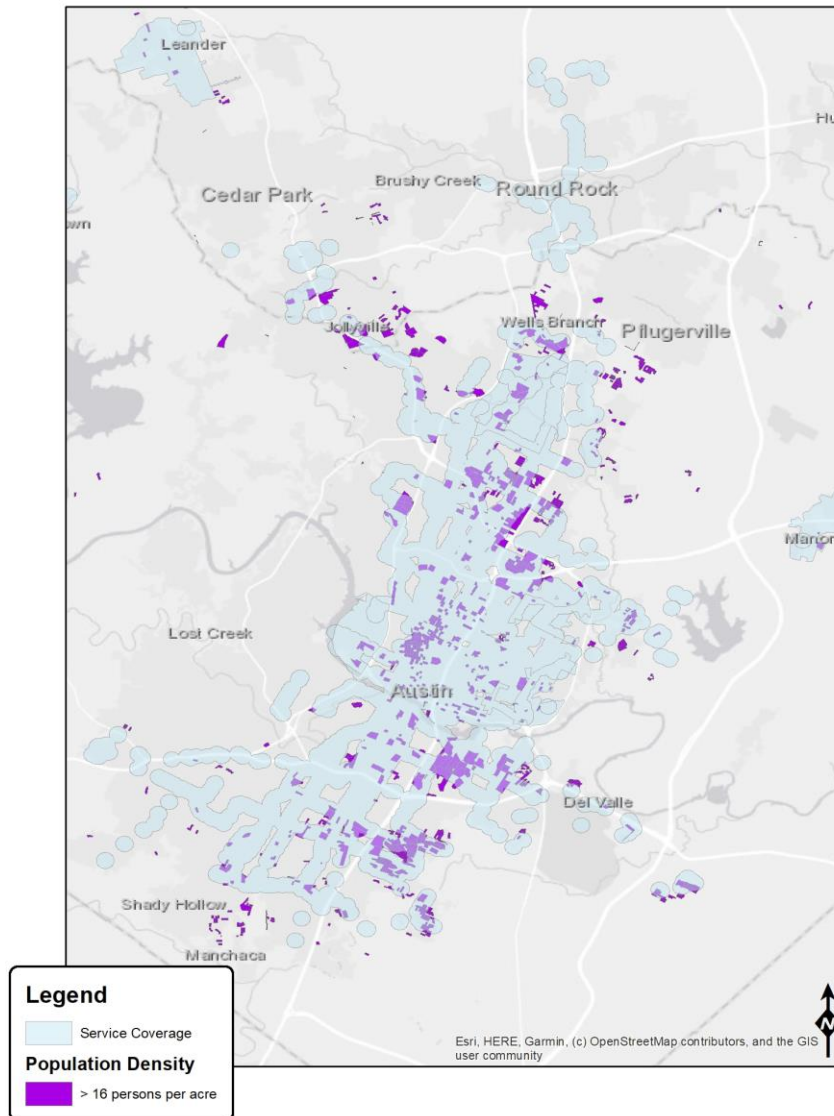
Capital Metro realizes that OTP is a critical measure of the quality and reliability of its services. A task force meets monthly to identify OTP root causes and make the appropriate running time adjustments at each service change.

Service Availability

Service availability is a general measure of the distribution of routes within Capital Metro's service area. Capital Metro's guideline is to prioritize service within walking distance (quarter mile) of areas with a residential density of 16 persons per acre. Residential density is a primary influence on transit demand and this guideline reflects industry standards for minimum density needed to support cost-effective transit service.

By creating a quarter mile buffer around every bus stop and then determining the overlap with density of 16 persons per acre, Planning was able to determine that 82% of areas meeting the residential density threshold meet the service availability guideline. This is an increase from 78% in 2018. Most of the increase is the result of the implementation of Pickup service.

Capital Metro Service Coverage



There are two major reasons why more area isn't covered. First, some of the areas are not contiguous; making them difficult to serve effectively. Second, the road network in Capital Metro's service area does not allow transit to access certain areas.

Transit Amenities

Capital Metro has two guidelines to guide the placement of amenities at bus stops:

- Bus stops generating at least 50 daily boardings qualify for a shelter
- Bus stops generating at least 15 daily boardings qualify for a bench

Amenities may be placed at locations not meeting these guidelines if the stop is located near:

- Major activity/employment centers
- Hospitals or social service agencies
- Apartments with 250+ units
- Schools
- Route intersections
- Service frequency greater than 30 minutes

Planning analyzed bus stops in minority and non-minority Census block groups to determine the number of stops that meet the guideline. Bus stops in minority Block Groups meet the guidelines for shelters more than stops in non-minority areas.

	Benches	Shelters
	Meets Guideline and has a bench	Meets Guideline and has a shelter
Minority	83.6%	76.0%
Non-Minority	84.8%	56.5%

Vehicle Assignment

Vehicle assignments are guided by a memorandum previously reviewed by the FTA (see Attachment A). Planning compared actual vehicle assignments to recommended assignments for February and observed:

- 3,821 instances of vehicle assignment to minority routes with 681 instances of the wrong vehicle being assigned (17.8%)
- 1,828 instances of vehicle assignment to non-minority routes with 366 instances of the wrong vehicle being assigned (20.0%)
- Minority routes have the correct vehicle assigned more often than non-minority routes.

Summary

Overall, Planning found no disparate impact existing on the basis of race, color, or national origin. The only corrective action that needs to take place is the improvement of on-time performance. The following table summarizes the finding for each standard, guideline or policy that was monitored:

Standard	Results
Vehicle Load	Neither minority or non-minority routes exceeded service standards
Vehicle Frequency	Neither minority or non-minority routes exceeded service standards
On-Time Performance	Both Minority & non-minority routes failed to meet the standard
Service Availability	82% of area within service area meets the guideline
Transit Amenities	Bus stops in minority Block Groups meet the guidelines for shelters more than stops in non-minority areas
Vehicle Assignments	Minority routes have the correct vehicle assigned more often than non-minority routes.

The next time a service monitoring will take place when ridership recovers to 80% to pre-COVID levels.

ATTACHMENT A

TO: Planning Staff

FROM: Planning Staff

DATE: March 26, 2015

SUBJECT: Vehicle Assignments by Block and Type (Daily Services)

The following memorandum explains the practices of vehicle assignments exercised at Capital Metro's 2910 East 5th St. facility and its North Operations Garage at McNeil Rd.

Process

As part of each regular service change mark-up, the Planning Department recommends the type of vehicle to be operated on a particular block assignment and route. Various factors are considered when determining these assignments.

Once Planning and Scheduling teams finalize schedules, vehicle blocking assignments required to meet daily operations are started. Assignments are reviewed for entire day operations for Weekday, Saturday and Sunday. However, since Weekday vehicle requirements are the maximum for the agency, this particular day is reviewed more extensively and divided into Morning Peak, Midday, Afternoon Peak, Evening and Late Night requirements.

Vehicle Types by Particular Route Services

Due to the nature of several particular routes in operation, items such as interior/exterior vehicle features and seating types/configurations can influence a vehicle assignment type. The following are route services that require particular vehicle types due to the nature of their operations:

- Historical - Downtown Circulator Services (The Dillo's) – Diesel Trolleys (29' TR) were used for these particular services due to their external and interior configurations. The vehicles helped "brand" the service and enabled users (typically non-traditional bus riders) to easily identify the service. The vehicles were not designed for long distance or fast speed travel and were confined to short route configurations. As of Fall 2009, this service was eliminated and these vehicles are no longer in service.
- Express Services – Two types of vehicles are used for this particular service; the 40' Suburban (40' SUB) and 45' Over the Road Coach (45' ORC). Both vehicles use particular seating types suited for long distance travel. Assignments between the two types are based on passenger loads.
- Over the Road Coach (45' ORC) – For efficiency of vehicle utilization, Capital Metro regularly interlines blocks between various route services. However, due to the height

and length of this particular vehicle interlines must be limited for use on only Express route operations.

- University of Texas Shuttle – Due to special design schemes on units to identify their use on this particular system, particular buses are assigned to this set of services
- MetroRapid – this federally grant funded program requires use of newly purchased and specialized vehicles for this particular service.

Comprehensive Review of Vehicle Types for All Services

For all routes not uniquely associated with a particular vehicle type, staff uses the following steps to determine appropriate vehicle assignments.

- 1) Trapeze Scheduling software is used to export a file for each day of scheduled operations that lists the block, garage pull-out time and garage pull-in time by day of service (i.e. Weekday, Saturdays, Sundays, Thursday Only, Friday Only, etc.).
- 2) This table of Raw Data is then calibrated to determine its “Make Ready” time.
 - a) The calculation used to determine the “Make Ready” time for a bus uses the scheduled garage pull-out time and allows 3 hours prior to this time as the time when this vehicle must be available for service operation. This ensures that adequate time is available to complete scheduled and unscheduled maintenance work on a vehicle prior to its intended use.
- 3) Planning uses the following data for the most recent time period prior to the scheduled mark-up to help identify initial vehicle type assignments. Information for each of the following is listed in order of frequency to determine priority of vehicle type changes.
 - a) Automatic Passenger Counter (APC) data – Information by route and block are used to identify blocks where maximum passenger loads are exceeding the service standard set for that vehicle and route type. For instance, for local multiple stop service, standing loads are allowed during Weekday morning and afternoon peak hours. However, for Express services which must travel on the highway, only full seated loads are recommended for vehicle types used on this service.
 - b) Radio Delay Logs – Daily listing of all delays related to passenger and capacity loads are reviewed for all blocks. Information catalogues, time of day, day of week, vehicle type in use and location of occurrence.
 - c) Customer Call Reports – Daily calls related to complaints regarding overloads or crowding are reviewed for all blocks. Information is not as detailed compared to other sources, but follow-up is made with customers and field checks are completed by route supervisors to gather more information.
- 4) A comprehensive list is developed depicting blocks, make ready time, garage pull-in time, duration, other assignments (such as School Trips or Interlines) and initial vehicle types based on data outlined in item 3) or particular route services (i.e. Trolley and Express).
- 5) This list is then displayed as Weekday Morning Peak (start of service to 8:30am); Midday (8:30am to approximately 1:00pm); Afternoon Peak (approximately 1:00pm to midnight) and Late Night (specialized services operating until 3am such as EBus, Starlight/Moonlight and Night Owl). Saturday and Sunday operations are listed in the same format.

- 6) Staff must then work to ensure that the maximum available vehicle by type is not exceeded during any of the listed time periods. The maximum available vehicle available by type is calculated as the maximum peak required multiplied by 1.2 (Federal Transit Administration calculations allow for 20% spare ratio). Thus, in the following example, a maximum requirement of 42 vehicles of a particular type, would require 50 vehicles available in the fleet. When this cannot be met, the following steps are needed:
 - a) Identify marginal routes (those that do not normally record ridership issues) and determine whether a change in their initial assignment can assist.
 - b) Identify “tripper” blocks (those whose duration is approximately 1-2 hours) and determine whether a change in their initial assignment can assist.
 - c) Identify those blocks with Interlines and School Trips and verify ridership to determine whether a change in their initial assignment can assist.
- 7) The completed recommended assignments by block and day of operation are then entered into the Trapeze System for use by Maintenance, Yard Supervisors and Operations staff daily.
- 8) During the course of the mark-up, information will begin to be received via operators, customers or data to indicate possible issues with a particular vehicle assignment on a block. When an issue arises, the following steps will be taken:
 - a) Field Verification is to be made by a Route Supervisor within 24 hours of the initial report of an issue. The supervisor is to speak to the operator (particularly if this person is assigned daily to the block) and report back findings.
 - b) Planning staff reviews Radio Logs, APC's to identify whether this issue has been recorded and its frequency.
 - c) Planning staff initiates a process to schedule a Ridecheck to confirm if additional information is required.

If findings indicate a problem with the assigned vehicle type, then staff must begin the process outlined in step 6) to find a solution. If a particular vehicle type cannot be identified to assist with this situation, then staff must work with the Operations Team to determine whether a “Que” bus or other “tripped” service can assist the situation until a permanent schedule and/or route change can occur at the next mark-up.

Capital Metro Title VI Policies and Peer Review

Final

June 15, 2021

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1 Purpose

This technical memorandum documents the examination of the rationale for the Capital Metro Transportation Authority (Capital Metro) recommended changes to their Major Service Change, Disparate Impact and Disproportionate Burden (DI/DB) Policies along with examples from peer agencies as applicable to clarify the policy development process and provide context for potential changes. The examination of the rationale for policy changes and peer agency examples are followed by a description of recommended policy updates.

2 Overview

Capital Metro has elected to revise their Major Service Change and DI/DB Policies to ensure their continued compliance with FTA regulations related to Title VI of the Civil Rights Act of 1964 and Environmental Justice Executive Order 12898. The objective is to establish new Title VI policies that are easy to quantify, explain, and use during planning and decision-making. The policies should be transparent, easy to understand and “evergreen”, to ensure lasting relevance.

Any transit agency that operates greater than 50 peak vehicles and is a recipient of federal funds must develop Title VI policies that determine when service and fare changes will undergo a formal equity analysis to assess whether the impacts of the change will result in a Disparate Impact to minority riders or a Disproportionate Burden to low income riders.

Capital Metro adopted their Title VI policies in 2013; shortly after the federal Title VI guidance under C4702.1B¹ was released. While agencies can change the policies, it must occur with the triennial submittal of their Title VI program. Changes to both demographics and services since the policies were adopted, necessitates a thorough review of the policies and thresholds and provides an opportunity to consider further anticipated changes associated with Project Connect to ensure that the policies remain relevant and appropriate.

3 Peer Agency Benchmarking

The peer benchmarking review is intended to provide context and comparison of other agencies’ approach to Title VI policies, including the Major Service Change and DI/DB Policies and to provide a setting for recommended changes. The benchmarking is not intended to provide an agency-by-agency comparison of the rationale that went into the policies’ development. Rather, it presents an opportunity to review general demographic and mode characteristics along with the agencies’ thresholds and policies so that Capital Metro staff could see how other agencies have approached this complex subject matter.

Thresholds relate to the magnitude or intensity that must be exceeded for a certain condition to be manifested. The thresholds needed for Title VI policies include the following:

- Threshold for the amount of change that would necessitate a Service Equity Analysis (Major Service Change Policy)
- Threshold of impacts from service or fare change that if exceeded would render a finding of Disparate Impact or Disproportionate Burden (DI/DB policy)

¹ FTA Circular 4702.1B- TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS, October 1, 2012.

- Income threshold for determining what would be considered “low income” for purposes of conducting a service or fare equity analysis (DI/DB policy)

The peer benchmarking presents the agencies’ thresholds, comparative data sets, and definitions as a way to improve Capital Metro’s existing policies and better address future conditions such as demographic shifts or service expansions.

While the federal guidance under C4702.1B requires transit providers to set numerical thresholds for the DI/DB policies, they do not suggest actual threshold levels or dictate how agencies should choose appropriate numbers. Further, because the thresholds do not represent a statistical significance, there are no statistical methods available to assist in selecting the thresholds.

As such, the DI/DB thresholds do not represent a threshold at which a change is statistically significant. Rather, it represents what thresholds are appropriate to depict the impacts of service changes to protected populations given the demographics of the region balanced against flexibility the agency requires to update service and fares to meet the needs of the agency.

Similarly, the thresholds for establishing a Major Service Change are also not statistically significant and may simply represent a “cut off” for service changes that would provide direction on when to conduct a federally required equity analysis, rather than whether a service change would have any major impacts to riders.

4 Peer Agency Selection and Characteristics

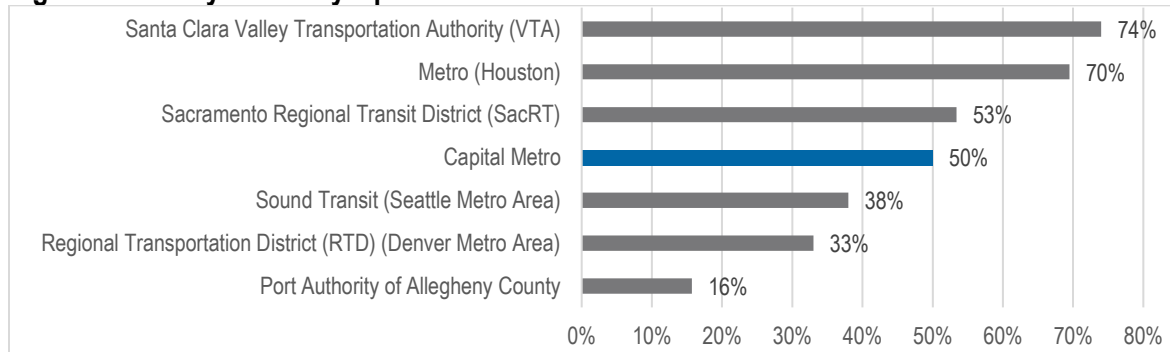
Peers were selected to reflect a variety of operating and demographic characteristics to be comparative to the Capital Metro operating environment. This included the operation of multiple modes, such as Light Rail Transit (LRT) or Bus Rapid Transit (BRT), to review how multimodal operation was addressed. In addition, a number of other elements such as the size of the agency, the fleet composition, the annual budget, service hours and miles, ridership and population per service mile were also reviewed. This also helped to provide context on each agency’s approach. It is important to point out that each agency is unique, including Capital Metro, and no agency can be exactly comparable on all metrics that were reviewed.

Capital Metro selected the following agencies for formal peer review:

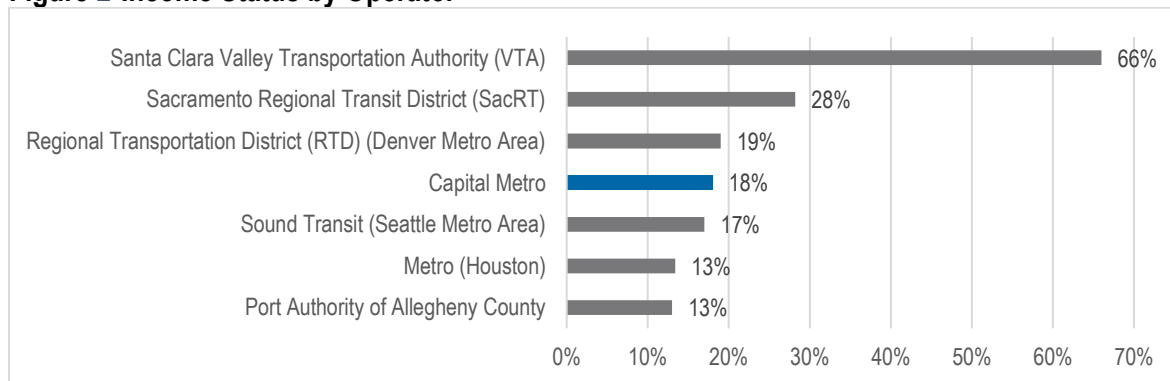
1. Regional Transportation District (RTD) (Denver Metro Area)
2. The Metropolitan Transit Authority of Harris County (Houston Metro)
3. Port Authority of Allegheny County
4. Sacramento Regional Transit District (SacRT)
5. Santa Clara Valley Transportation Authority (VTA)
6. Sound Transit (Seattle Metro Area)

Additional agencies have been included in **Appendix A: Agency Characteristics and Disparate Impact/Disproportionate Burden Policies** for perspective.

For both the minority and income metrics, Capital Metro is in the middle of the peers, with 50% of their service area population designated as minority and 18% designated as low income. **Figure 1: Minority Status by Operator** and **Figure 2: Income Status by Operator** below presents the minority and income percentages for peer operators.

Figure 1 Minority Status by Operator

Source: Various (see Appendix A.10)

Figure 2 Income Status by Operator

Source: Various (see Appendix A.10)

Sacramento Regional Transit District (SacRT) is closest to Capital Metro in terms of percentage of minority population, while Sound Transit and Denver RTD are closest in terms of income. It should be noted that each agency defines their low-income population a bit differently, which we will examine further in this review. National Transit Database (NTD) 2019 statistics were used to review the operational characteristics of the agencies chosen to view the comparisons to Capital Metro, provided below in **Table 1: Agency Operating Characteristics**.

Table 1: Agency Operating Characteristics

Agency	Annual Bus Miles	Service Area Population per Square Mile	Peak Bus Fleet	Peak Rail Fleet	Annual Operating Expenses*
Capital Metro	17,100,313	2,391	353	12	\$234,119,568
Metro (Houston)	44,864,064	2,871	1,024	54	\$574,298,124
Port Authority of Allegheny County	20,926,821	1,826	603	58	\$433,535,787
Denver RTD	35,920,638	1,247	838	204	\$644,361,264
Sacramento RTD	6,234,944	4,740	161	69	\$167,268,439
VTA (Santa Clara)	15,948,425	5,648	394	57	\$418,667,005
Sound Transit (Seattle)**	11,982,301	2,906	274	126	\$336,356,444

*Expenses include demand responsive reported under NTD.

**Reflects service characteristics only reported under NTD 00040.

Source: National Transit Database, 2019.

Again, in terms of annual bus miles and peak fleet, Capital Metro is toward the middle of the peers. In terms of the operating characteristics, Capital Metro is closest to VTA. However, in terms of Service Area Population per Square Mile, Capital Metro is more similar to Houston Metro.

5 Peer Agency Review - Major Service Change Policies and Thresholds

The Major Service Change Policy is designed to assist transit agencies in determining when it would be necessary to conduct a service or fare equity analysis. All of the peer agencies took a relatively similar approach to defining what constitutes a Major Service Change. All of the agencies used a percentage change in the number of service hours or miles, often 25% of route miles/hours on a given route. This metric likely coincides with federal requirements according to 49 U.S.C. 5307 (c)(1)(I), which calls for agencies to have a locally developed process to solicit and consider public comments before raising a fare or implementing a major reduction in public transportation service.

All of the agencies but two (Denver RTD and Sound Transit) indicated that any full establishment or elimination of transit service would constitute a Major Service Change. Some agencies use service hours, while other agencies use revenue hours. Also, most agencies indicate that the change should be viewed on a route or line level. About half of the peer agencies do not indicate whether the change applies to a yearly, daily or weekly percentage change while several of the peers applied the percentage change to either weekly, daily or Saturday/Sunday hours. Capital Metro uses daily service hours but does not indicate that same temporal envelope for route miles, which may add some confusion when assessing whether a route mile change would be classified as a major service change. **Table 2: Service Hours/Miles in Major Service Change Policies**, presents the service hours/miles thresholds by agency.

Table 2: Service Hours/Miles in Major Service Change Policies

Agency	Change in Route or Revenue Miles
Capital Metro	Modification of greater than 25% of daily service hours or 25% of route miles
Regional Transportation District (RTD) (Denver Metro Area)	Greater than 25% reduction or addition of service hours of any route
Santa Clara Valley Transportation Authority (VTA)	Greater than 25% of the route miles or revenue hours
Port Authority of Allegheny County	Change of more than 30% of weekly trips or service hours on a given route
Sacramento Regional Transit District (SacRT)	Change to an existing route that affects more than 15% of the daily revenue miles
Sound Transit (Seattle Metro Area)	Span or frequency change affecting 25% or more of line's weekly platform hours
Metro (Houston)	Greater than 25% of revenue hours on a given transit route or route branch, for any weekday, Saturday or Sunday Service

Source: Various (see Appendix A.10)

Capital Metro does not currently include exceptions in their Major Service Change Policy. Half of the peers include exceptions to the Major Service Change policy, while the other half does not; even though exceptions are referenced in FTA Circular 4702.1B. Typically, agencies use exceptions that represent situations beyond the control of the agency in addition to conditions associated with temporary service (such as those changes necessitated by roadway construction or emergencies). The full comparison of the Major Service Change Policies of the peers is included in **Appendix A: Agency Characteristics and Disparate Impact/Disproportionate Burden Policies**.

6 Peer Agency Review - Disparate Impact and Disproportionate Burden Policies and Thresholds

The federal Title VI guidance under C4702.1 B states that a DI/DB policy shall present a threshold for determining when adverse effects of service or fare changes are borne disproportionately by minority (and low income) populations by presenting the percentage of impacts borne by minority (or low income) populations compared to impacts borne by non-minority (or non-low income) populations.²

The review of the DI/DB thresholds of the peer agencies presented a number of elements that Capital Metro should consider when establishing their own thresholds. This includes the comparative populations as well as the percentages used to determine when service and fare changes would result in Disparate Impacts to minority populations or a Disproportionate Burden to low income populations.

6.1 Peer Fare and Service Policy Threshold Metrics

The following three metrics for defining DI/DB thresholds were discovered as part of the peer benchmarking review:

- Percentage of protected riders subjected to adverse effects compared to percentage of non-protected riders subjected to the adverse effect.
- Percentage change experienced by protected riders compared to percentage change experienced by non-protected or all riders.
- Percentage of adversely affected protected population compared to the overall percentage of the protected population of the service area.

Figure 3: Peer Fare and Service Policy Metrics shows the three metrics and the metric that each respective peer agency is using to define DI/DB thresholds.

Figure 3: Peer Fare and Service Policy Metrics

Metric	Houston	Port Authority of Allegheny County	Denver RTD	VTA	SacRT	Sound Transit
Percentage of protected riders subjected to adverse effects compared to the percentage of non-protected riders subjected to the adverse effect	✓	✓				
Percentage change experienced by protected riders compared to percentage change experienced by non-protected or all riders			✓	✓	✓	
Percentage of adversely affected protected population compared to the overall percentage of the protected population of the service area						✓

Source: Various (see Appendix A.10)

The Houston Metro and Port Authority metric of comparing the percentage of protected riders subject to adverse effects to other rider populations can work for assessing service changes where there can be winners and losers when adding or eliminating service. However, it can be difficult to use this approach for fare changes, because generally all fare products (and all riders) will be impacted by a systemwide fare change.

² FTA C4702.1B, Chapter IV-13

The Denver RTD, VTA, and SacRT approach of comparing the percentage change experienced by protected riders compared to percentage change experienced by non-protected or all riders is reasonable to use for fare changes. This approach meets the C4702.1B requirement for agencies to provide both the absolute and the percentage change for all fare changes. Further, using the percentage change experienced by riders as the basis for analysis satisfies both the federal requirement and facilitates fare equity analyses.

One agency (Sound Transit) uses the comparison of the percentage of adversely affected protected population compared to the overall percentage of the protected population of the service area. However, this does not meet the definitions included in the federal guidance—which requires agencies to analyze the changes experienced by protected populations compared to the changes experience of non-protected populations. It also does not provide for an accurate analysis for systemwide fare changes, as all of the protected population would be likely impacted.

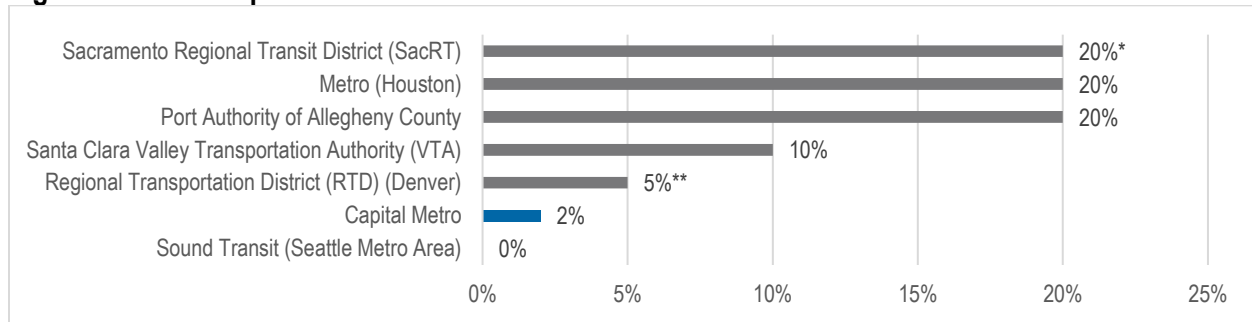
6.2 Service and Fare Peer Thresholds

As previously mentioned, while the FTA requires transit operators to set numerical thresholds for determining when service or fare changes would result in a disparate distribution of impacts, the guidance under C4702.1B does not suggest thresholds nor do they provide guidance on how they should choose thresholds appropriate to their service operation. As such, setting the numerical threshold is generally arbitrary, as there is no way to use statistical methods to select an appropriate threshold.

Further, during training sessions on the new guidance in 2012, FTA used a variety of thresholds ranging from 2% to 10% in discussing how to conduct service and fare equity analyses which led some agencies to adopt the thresholds used in the training sessions. Some agency Civil Rights professionals who were also responsible for Equal Employment Opportunity (EEO) previously used the Department of Labor's 4/5ths policy³ in determining "substantially different rate of selection" for employment analysis as required under 41 CFR §60-3.4. As a result, many agencies currently use 20% as their threshold as it corresponds to already understood percentages.

The peer agencies' thresholds were between 0% and 20%, with some exhibiting variations between the thresholds they had established for fares and the thresholds they established for service. Other than Sound Transit, Capital Metro has the lowest threshold at 2%. Additionally, all agencies had the same numerical threshold for both Disparate Impacts as well as Disproportionate Burden. **Figure 4: Peer Comparison for Fare Thresholds** presents the peer comparison for thresholds for fares, while **Figure 5: Peer Comparison for Service Thresholds** presents the peer comparison for systemwide service changes. The full comparison of the DI/DB Policies of the peers is included in **Appendix A: Agency Characteristics and DI/DB Policies**.

³ 41 CFR §60-3.4 A selection rate for any race, sex, or ethnic group which is less than four-fifths (4/5ths or eighty percent) of the rate for the group with the highest rate will generally be regarded by the Federal enforcement agencies as evidence of adverse impact.

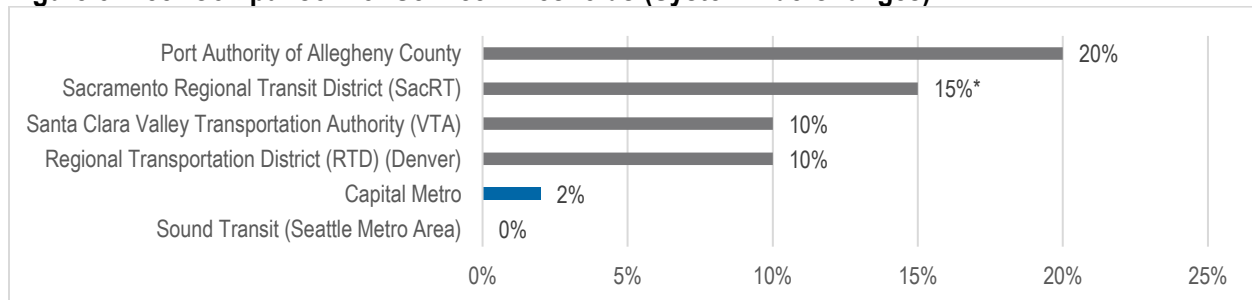
Figure 4: Peer Comparison for Fare Thresholds

*+/-20% of the change

**+/-5%

Note: These thresholds are the same for single and multiple fares

Source: Various (see Appendix A.10)

Figure 5: Peer Comparison for Service Thresholds (Systemwide Changes)

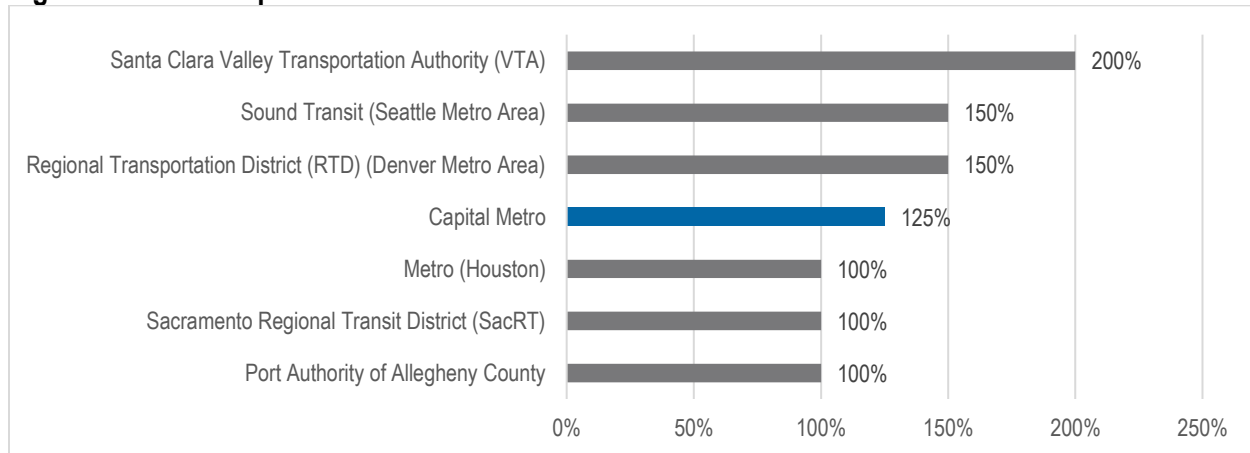
*15% greater than the % of protected riders

Note: Data for Houston Metro is not comparable, as it relates to changes to travel time in excess of 15 minutes as the determination of DI/DB

Source: Various (see Appendix A.10)

6.3 Low-Income Peer Thresholds

Each agency must determine the low-income threshold for their service area. Capital Metro reviewed each agencies' low-income classification in comparison to Capital Metro's definition which is currently 125% of the Federal Poverty Guidelines. Again, Capital Metro is in the middle of the peers between VTA (Santa Clara) at twice the Federal Poverty rate, and the remaining three agencies (Houston, SacRT and Port Authority) who define low income at the Federal Poverty Rate. Typically, agencies consider the cost of living when defining low income parameters so that metro areas can account for high local costs. For a point of comparison, the Federal poverty rate for a family four in 2021 would equate to earning about \$12 per hour. Using Capital Metro's definition, the low-income household income would equate to earning almost \$16 per hour for a family of four. **Figure 6: Peer Comparison of Low-Income Definition** presents the peer agencies' low-income definition as it relates to the Federal Poverty Guidelines.

Figure 6: Peer Comparison of Low-Income Definition

Source: Various (see Appendix A.10)

7 Recommendations

7.1 Overview

To ensure consistency of application and to promote understanding, it is recommended that the three current policies be consolidated into one, central Title VI Policy that includes the Major Service Change Policy and the DI/DB Policies. The Major Service Change policy establishes when an equity analysis should be conducted, and the DI/DB policies establish whether the equity analyses result in inequitable impacts. Having all three policies under one umbrella will also help establish the inherent connectedness of the policies represented in the spirit of the federal guidance.

Toward the goal of increasing consistency of application, the recommendations also include a number of elements that will help the board and public understand Capital Metro's obligations under Title VI.

The thresholds contained in the DI/DB policies represent the most significant change to the policies. While the thresholds may represent an arbitrary standard, the thresholds do represent the agency's commitment to equity when developing service and fare change proposals. As such, we considered what the threshold represents given the unique operating characteristics of Capital Metro, which is currently approximately 50/50 minority/non-minority of the total population.

The Capital Metro service area's demographic composition suggests that the threshold could be increased from the current (2%) to be in alignment with industry practices and peers and their demographics and allow the agency flexibility for reasonable adjustments to service and fares without undue burden to minority populations. As an example, if the service area were 95% minority, most proposals would not render a disparate impact as the majority of the population would be subject to similar impacts. Should the opposite be the case and the service area had a very small minority population of 5%, much more precision in the threshold would be appropriate to ensure that all the benefits or impacts would be equally distributed. Consequently, having a slightly higher threshold both demonstrates the agency's commitment to equity while helping to ensure that reasonable service or fare proposals can occur without mitigation.

7.1.1 Changes to Major Service Change Policy

Several changes will assist in uniform application by staff, including providing definitions for commonly used terms; standardizing the percentages that trigger a major service change; standardizing the percentages used; and including exceptions used in the Major Service Change definition. Changes were not made to the actual percentages used or to the elimination or the establishment of fixed route service.

7.1.2 Definitions

Adding definitions provides additional context for the recommended policy changes. First, they provide needed guidance and further understanding for the broad concepts identified in the federal guidance. Next, they define specific elements such as what would constitute adverse effects, which is required by the federal guidance. As a result, we have suggested a number of definitions that can help codify some needed elements (such as Low-Income Population and Adverse Effects/Impacts) while providing helpful definitions for staff who will be responsible for Title VI compliance activities now and in the future. The recommended Title VI Policies are included in **Appendix B: Title VI Policies**.

7.1.3 Revenue Hours/Miles Versus Service Hours/Miles

Currently, the Major Service Change Policy uses “daily service hours” and “route miles” which can be open to interpretation by staff. To promote clarity, it is recommended that the policy use “annual revenue hours” and “annual revenue miles” which are standard data references used by agencies and the NTD. Additionally, by using “annual” instead of “daily” the metric captures weekend changes that may have less of an impact than weekday hours but may trigger the 25% threshold.

From a peer perspective, there is no commonality, as each agency uses a somewhat different definition. However, using annual revenue hours and miles not only comports with data that is currently required by NTD and will assist in consistent reporting, but it standardizes the definition for both miles and hours.

7.1.4 Exceptions

Not every service change warrants an equity analysis, and providing exceptions will set expectations for both board, staff and the public as to when service equity analyses would be required. Half of the peer agencies included exceptions; of those that did, all of them included exceptions for emergencies, street closures or situations outside of the agencies’ control. However, it is also recommended that the policies include other issues that may not rise to the level of needing an equity analysis such as route renumbering associated with rebranding and temporary additions to service that last less than one year.

7.1.5 Fares

Other than for specific exceptions, FTA guidance requires that all fare changes regardless of the size must be the subject of a fare equity analysis. As such, it is recommended that the Major Service Change Policy include guidance for fare changes so that staff has a clear understanding when equity analysis shall occur and which exceptions would negate that requirement, such as promotional fares.

7.2 Recommended Changes to Disparate Impact and Disproportionate Burden Policies

As noted previously, the thresholds established for DI/DB findings do not represent a statistical approach to determining equity. In addition to updating the thresholds, it is recommended that the agency codify the data sets used for evaluating the change, and should include both the absolute change and the percentage change experienced by protected (minority and low-income) and non-protected (non-minority and non-low-income)

populations. The recommended changes are based on the following policy objectives that were developed by Capital Metro:

1. Do the thresholds account for flexibility for future Project Connect modes, service expansions and anticipated fare changes?
2. Are the thresholds responsive to 50/50 service area demographics?
3. Do the thresholds allow for rounding?
4. Are the thresholds consistent with the state of the practice and the peer agency review?

7.2.1 Thresholds

Through reviewing the policy objectives, discussions with the agency staff and evaluation of the peer benchmarking data, a 10% threshold for establishing when changes would result in a finding of Disparate Impacts or a Disproportionate Burden was determined as a best fit for the following reasons:

- Rounding: Having a threshold that is below 5% could result in negative findings when the changes could be the result of a rounding error.
- It represents differences that most people can understand as being inequitable should the threshold be exceeded.
- It can appropriately assess potential impacts while still allowing for some variance between the comparative groups to be acceptable.

As a result of stakeholder input, Capital Metro staff has elected to retain the 2% threshold for the next three years. Staff may revisit the decision during the next Title VI triennial update period.

7.2.2 Comparative Data Sets

Similar to the current Capital Metro DI/DB thresholds, the guidance requires the comparison of the adverse impacts experienced by protected populations compared to the adverse impacts experienced by non-protected populations. Additionally, when benefits are associated with changes, assessing the percentage of benefits that accrue to protected populations compared to the benefits that accrue to non-protected populations is necessitated. The policies have been updated to reflect the intent of the federal guidance contained in Appendix K of FTA Circular 4702.1B⁴.

7.2.3 Mitigations

Under C4702.1B, agencies are required to avoid, minimize or mitigate proposed changes should the service or fare change result in a Disparate Impact.

While Capital Metro's Major Service Change and DI/DB policies address mitigations, some recommendations were made to strengthen the understanding on what would be required should a service or fare change result in a Disparate Impact finding. These recommendations include the provision of a meaningful opportunity for public comment on any proposed mitigation measures, including the less discriminatory alternatives that may be available.

Additionally, the recommendations also include language to help better describe Capital Metro's obligations should changes result in a Disproportionate Burden to low income populations, which is not a protected class under Title VI. These recommendations include describing the alternatives available to low income riders affected by service changes.

⁴ FTA Circular 4702.1B- TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS, October 1, 2012.

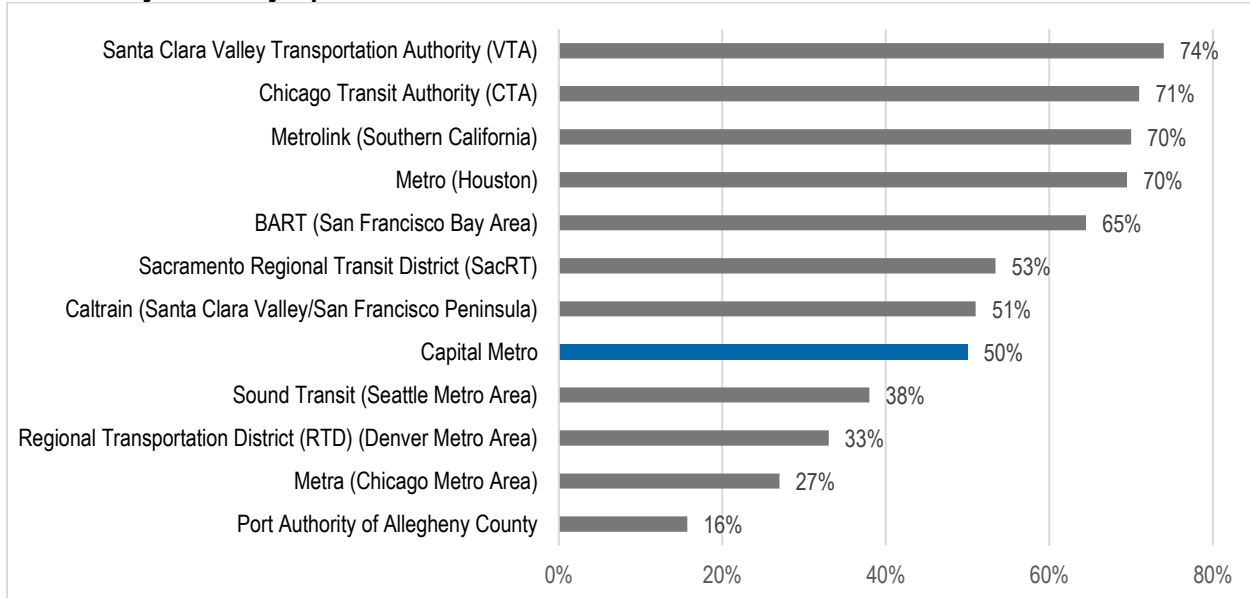
If Capital Metro finds potential Disparate Impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate Disparate Impacts, Capital Metro will reanalyze the proposed changes in order to determine whether the modifications actually removed the potential Disparate Impacts of the changes.

After analyzing proposed mitigations, if a less discriminatory alternative does not exist, Capital Metro may implement the proposed change only if:

- Capital Metro has a substantial legitimate justification for the proposed change; and
- Capital Metro can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish Capital Metro's legitimate program goals.

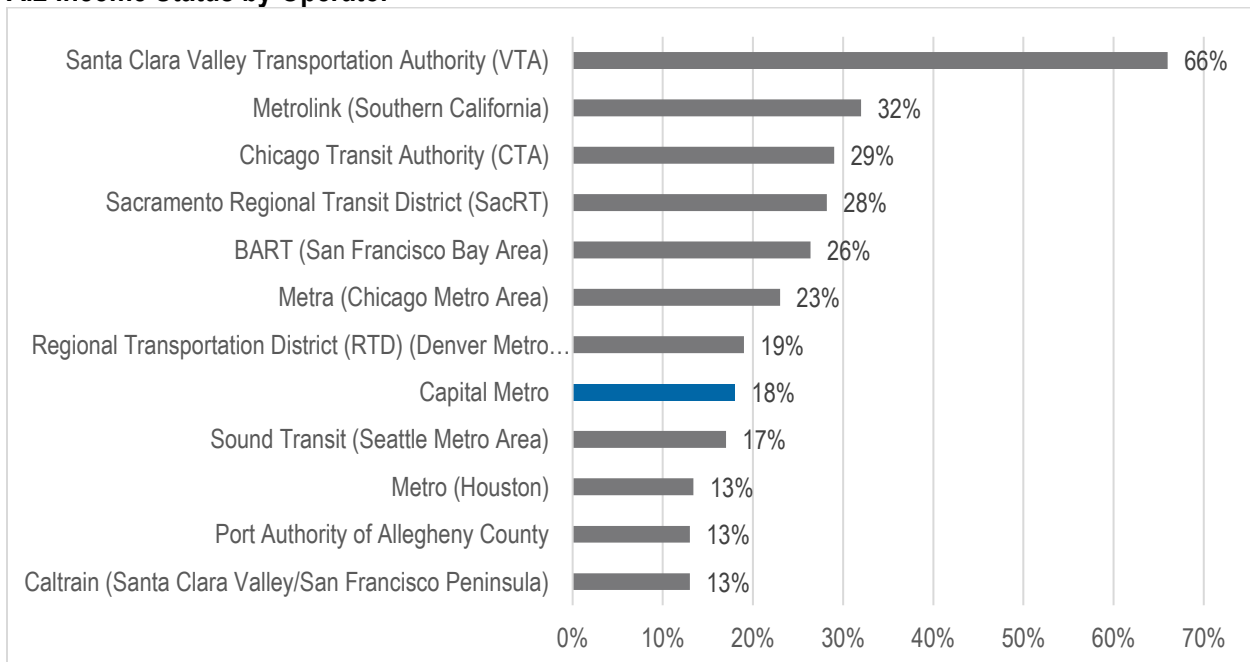
Appendix A: Agency Characteristics and Disparate Impact/Disproportionate Burden Policies

A.1 Minority Status by Operator



Source: Various (see Appendix A.10)

A.2 Income Status by Operator



Source: Various (see Appendix A.10)

A.3 Agency Operating Characteristics

Agency	Annual Bus Miles	Service Area Population per Square Mile	Peak Bus Fleet	Peak Rail Fleet	Annual Operating Expenses*
Capital Metro	17,100,313	2,391	353	12	\$234,119,568
BART (San Francisco Bay Area)	N/A	16,431	N/A	605	\$672,662,833
Caltrain (Santa Clara Valley/San Francisco Peninsula)	493,930	8,505	29	111	\$140,063,276
Chicago Transit Authority (CTA)	52,816,557	10,454	1,566	1,164	\$1,447,704,226
Metra (Chicago Metro Area)	N/A	3,743	N/A	1,066	\$782,173,784
Metro (Houston)	44,864,064	2,871	1,024	54	\$574,298,124
Metrolink (Southern California)	N/A	3,641	N/A	195	\$243,009,658
Port Authority of Allegheny County	20,926,821	1,826	603	58	\$433,535,787
Regional Transportation District (RTD) (Denver Metro Area)	35,920,638	1,247	838	204	\$644,361,264
Sacramento Regional Transit District (SacRT)	6,234,944	4,740	161	69	\$167,268,439
Santa Clara Valley Transportation Authority (VTA)	15,948,425	5,648	394	57	\$418,667,005
Sound Transit (Seattle Metro Area)***	11,982,301	2,906	274	126	\$336,356,444

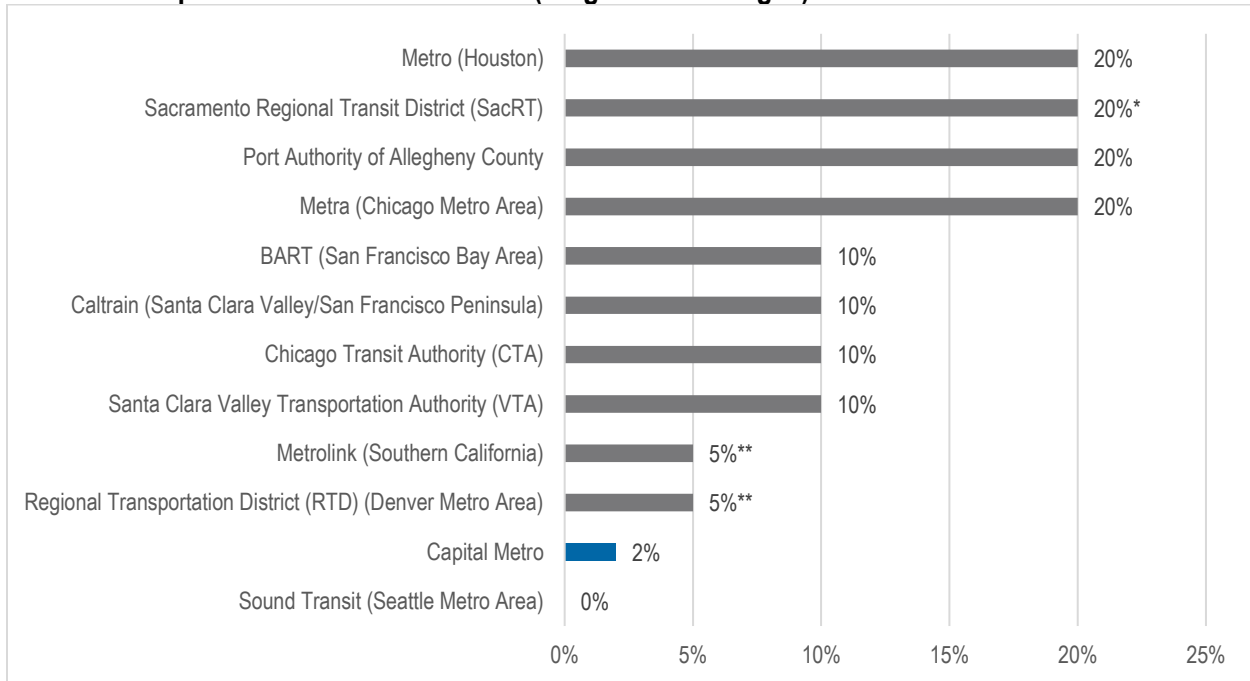
*Operating expenses include demand response reported under NTDID.
Source: Various (see Appendix A.10)

A.4 Service Hours/Miles in Major Service Change Policies

Capital Metro	Greater than 25% of route miles
Regional Transportation District (RTD) (Denver Metro Area)	Greater than 25% reduction or addition of service hours of any route
Santa Clara Valley Transportation Authority (VTA)	Greater than 25% of the route miles or revenue hours
Chicago Transit Authority (CTA)	No Data
Metra* (Chicago Metro Area)	No Data
Caltrain (Santa Clara Valley/San Francisco Peninsula)	Greater than 25% of the revenue miles on any given service day
BART (San Francisco Bay Area)	Greater than 25% in annual route miles
Metrolink (Southern California)	Greater than 25% per route
Port Authority of Allegheny County	Change of more than 30% of weekly trips, service hours on a given route
Sacramento Regional Transit District (SacRT)	Change to an existing route that affects more than 15% of the daily revenue miles
Sound Transit (Seattle Metro Area)	Span or frequency change affecting 25% or more of line's revenue hours
Metro (Houston)	Greater than 25% of revenue hours on a given transit route or route branch, for any weekday, Saturday or Sunday Service

Source: Various (see Appendix A.10)

A.5 Peer Comparison for Fare Thresholds (Single Fare Changes)

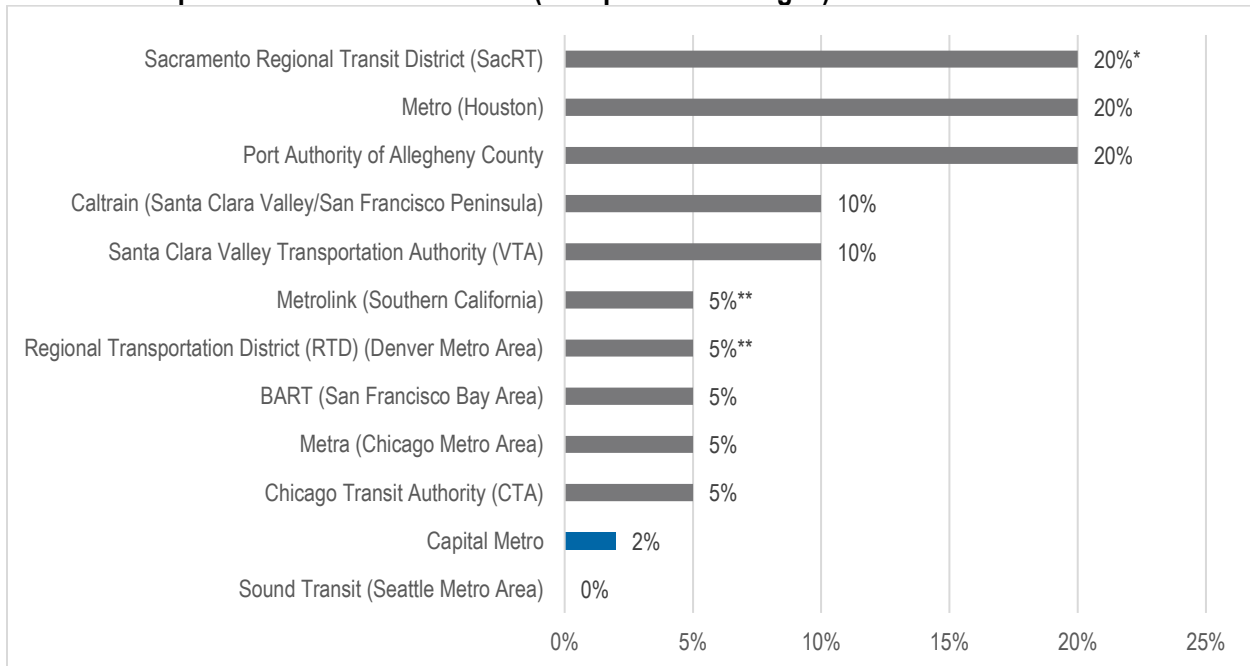


*+/-20% of the change

**+/-5%

Source: Various (see Appendix A.10)

A.6 Peer Comparison for Fare Thresholds (Multiple Fare Changes)

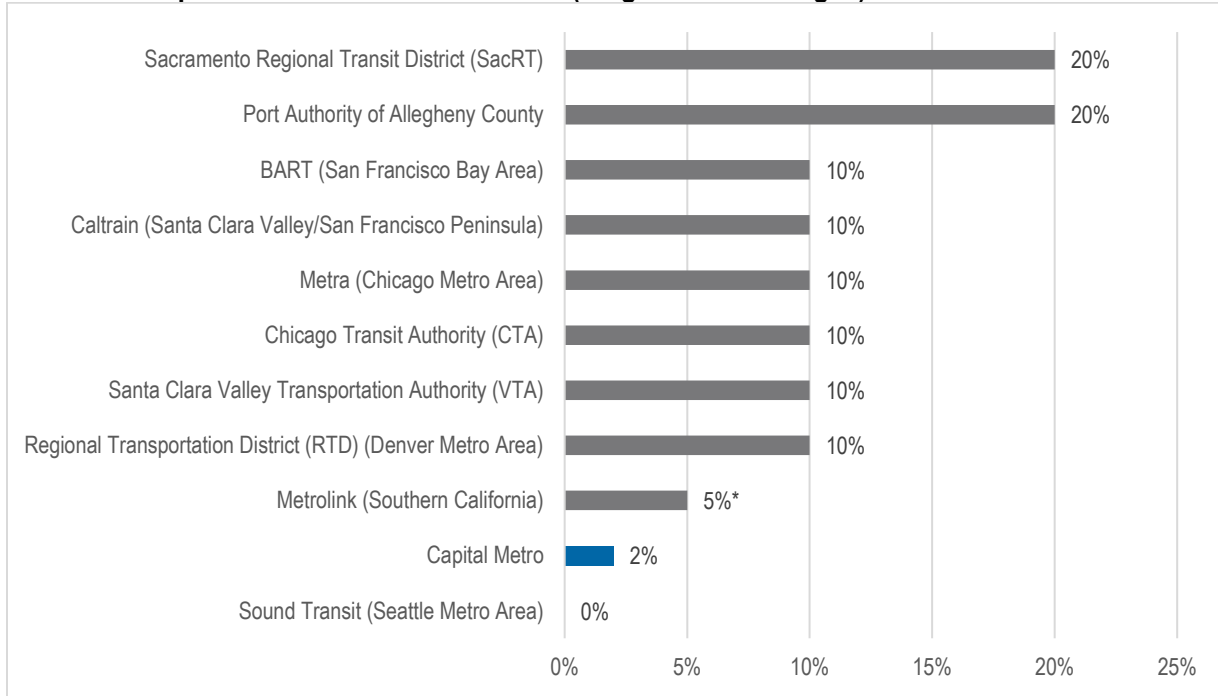


*+/-20% of the change

**+/-5%

Source: Various (see Appendix A.10)

A.7 Peer Comparison for Service Thresholds (Single Route Changes)

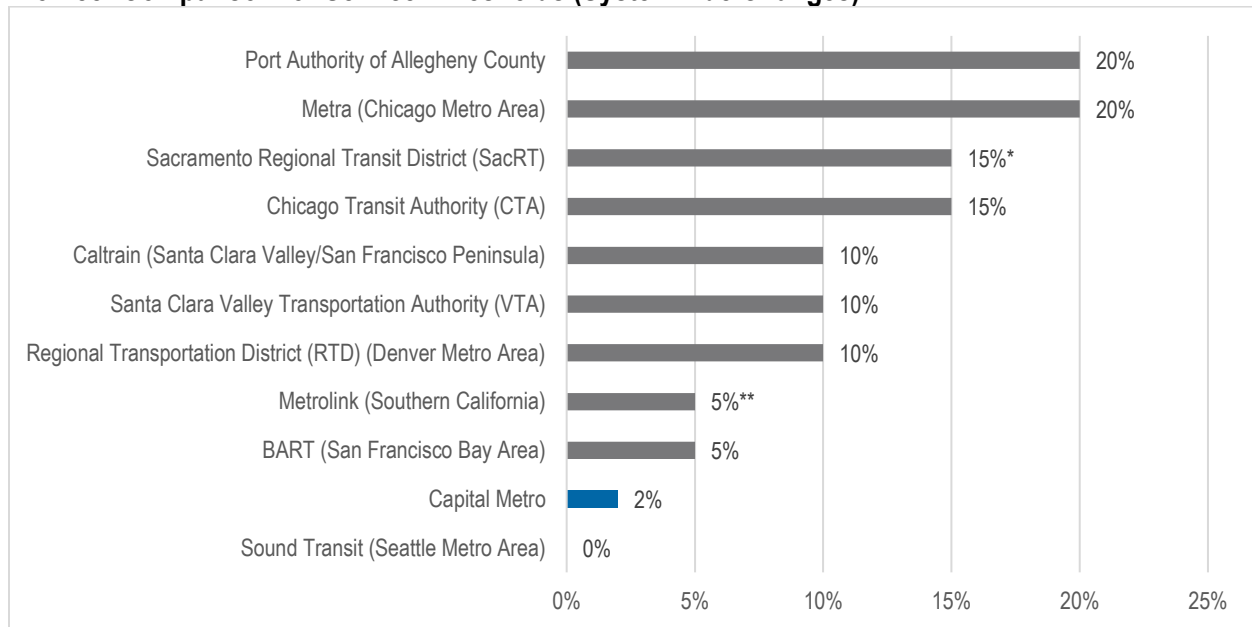


*+/-5%

Note: Data for Houston Metro is not available

Source: Various (see Appendix A.10)

A.8 Peer Comparison for Service Thresholds (Systemwide Changes)



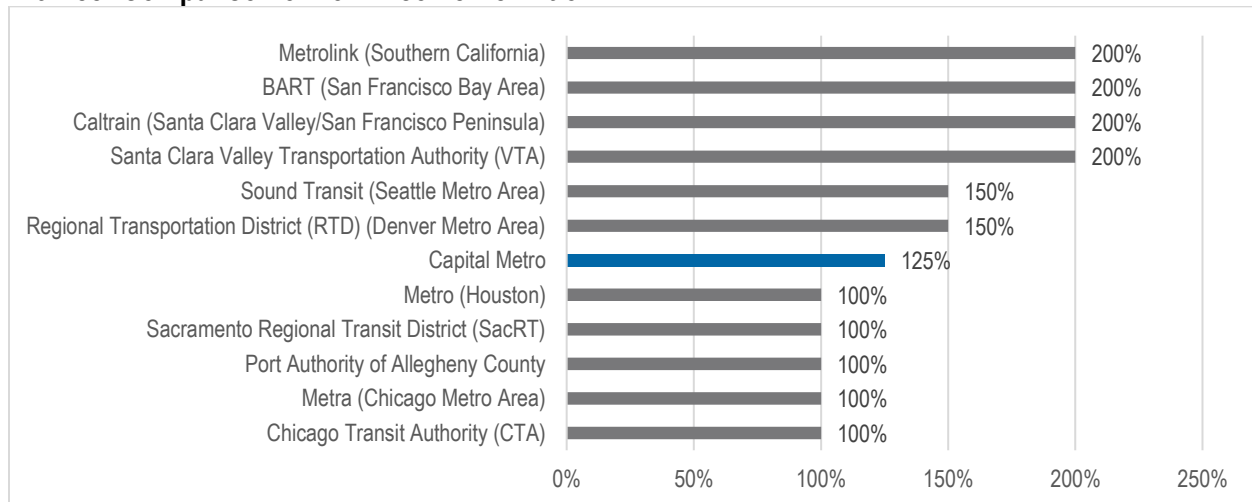
*15% greater than the % of protected riders

**+/-5%

Note: Data for Houston Metro is not available

Source: Various (see Appendix A.10)

A.9 Peer Comparison of Low-Income Definition



Note: Percentages are shown as percentage of Federal Poverty Guidelines

Source: Various (see Appendix A.10)


A.10 Sources

	Agency	Description
1	Capital Metro	Capital Metro. "Title VI Compliance Report." 2020.
2	Regional Transportation District (RTD) (Denver Metro Area)	Denver RTD. "Title VI Program Update." 2019.
3	Santa Clara Valley Transportation Authority (VTA)	VTA. "Major Service Change, Disparate Impact, & Disproportionate Burden Policies." 2013.
4	Chicago Transit Authority (CTA)	CTA. "Service and Fare Equity Policy." 2013.
5	Metra* (Chicago Metro Area)	Metra. "Metra Major Service Change, Disparate Impact, and Disproportionate Burden Policies ." 2013.
6	Caltrain (Santa Clara Valley/San Francisco Peninsula)	Caltrain. "Title VI - Standards and Policies." 2013.
7	BART (San Francisco Bay Area)	BART. "Disparate Impact and Disproportionate Burden Policy." 2013. BART. "Major Service Change Policy." 2013.
8	Metrolink (Southern California)	Metrolink. "Title VI DI DB Policy Fare Changes." 2019. Metrolink. "Title VI DI DB Policy Service Changes." 2019. Metrolink. "Major Service Change Policy." 2019.
9	Port Authority of Allegheny County	Port Authority of Allegheny County. "Disparate Impact and Disproportionate Burden Analysis Policy for Major Service Changes or Fare Changes ." 2017.
10	Sacramento Regional Transit District (SacRT)	Sacramento Regional Transit District. "Fare Change Policy." 2015. Sacramento Regional Transit. "Service Change Policy." 2015.
11	Sound Transit (Seattle Metro Area)	Sound Transit. "RESOLUTION NOs. R2013-18 and R2013-19." 2019.
12	Metro (Houston)	Metro. "Service & Fare Equity Policy." 2013.
13	National Transit Database	National Transit Database. 2019.

Note: American Community Survey (ACS) U.S. Census Data were used to determine income and minority percentages.

Attachment: Final_DIDB_Tech_Memo_061502021_DQC_CLEAN (4889 : Approval of Title VI Policy Revisions)

Appendix B: Title VI Policies

	<p>TITLE VI POLICIES:</p> <p>Major Service Change, Disparate Impact, Disproportionate Burden</p> <p>Mgr., Office of Diversity</p>	<p>Issued: X/X/2021</p> <p>Revised:</p> <p>Approved by: Board of Directors</p>
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B.1 Purpose

Title VI of the Civil Rights Act of 1964 (codified at 42 U.S.C. §2000D et seq.) prohibits discrimination on the basis of race, color, or national origin. As a recipient of federal funds, Capital Metropolitan Transportation Authority (Capital Metro) must ensure that it provides its services without discrimination on the basis of race, color, or national origin.

On October 1, 2012, the Federal Transit Administration (FTA) Title VI Circular 4702.1B became effective, requiring transit providers that have greater than 50 fixed-route vehicles in peak service operating fixed-route service to conduct equity analyses on service or fare changes that meet the agency's definition of a "Major Service Change". The purpose of this policy is to define what constitutes a "Major Service Change" and to establish thresholds for determining if service and fare changes would result in either a "Disparate Impact" on minority populations or a "Disproportionate Burden" on low-income populations.

B.2 Definitions

The following terms and definitions are to address the FTA Title VI Circular 4702.1B (October 1, 2012) and relate to the policies below.

- **Adverse Effects/Impacts** - Adverse effects/impacts are defined as impacts that may have negative consequences as a result of a contemplated service or fare change. An adverse effect for service can be defined as a geographical or temporal reduction in service that includes but is not limited to: elimination of a route, rerouting an existing route, or a decrease in frequency or span of service. For fare changes, an adverse effect can include, but is not limited to: increases in average fare, reduction of discounts for passes or groups of riders, or a reduction in access to discounted fare products such as those that may result from the introduction of new fare payment technology or other actions. Capital Metro will consider the degree of adverse effects, and analyze those effects, when planning Major Service Changes and all fare changes.
- **Disparate Impact** - A neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where Capital Metro's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
- **Disproportionate Burden** - A neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires Capital Metro to evaluate alternatives and mitigate burdens where practicable.

- **Emergency Service Adjustment** - Changes to routes, service frequencies, or service spans that may be necessitated by emergency situations (weather or otherwise) or a major catastrophe that severely impairs public health or safety, results in changes in access to public streets or rights-of-way, or restricts the ability to access Capital Metro equipment needed to operate service.
- **Environmental Justice** - The fair distribution of the benefits and/or the burdens associated with Federal programs, policies, and activities, including recipients of Federal funding such as Capital Metro.
- **Equity Analysis** - Analysis of proposed service or fare changes to determine if the burdens and benefits are equally distributed between minority and non-minority populations, and low-income and non-low-income populations.
- **Fare Change** - An increase or decrease in the riders' fare whether applicable to the entire system, or by mode, or by type of fare product or fare media. All fare changes regardless of the magnitude would require a Fare Equity Analysis, not including exceptions.
- **Fixed-Route** - Refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.
- **Low-Income population** - For purposes of this policy, low-income population is defined as any readily identifiable group of households who are at or below 125% of the United States Department of Health and Human Services Poverty Guidelines.
- **Minority Persons** - Persons who self-identify as being non-white under the United States Census Bureau guidelines. This includes American Indian and Alaskan Native, Asian, Black or African American, Hispanic, Latino or LatinX, and Native Hawaiian or Other Pacific Islander.
- **Minority Population** - Any readily identifiable group of minority persons who live in geographic proximity and if circumstances warrant, geographically dispersed/transient populations (such as migrant workers of Native Americans) who will be similarly affected.
- **Service Adjustment** - Any changes to service, such as reductions or increases to frequency, hours of operation (service span) or routing. Not all service adjustments will be considered Major Service Changes.
- **Title VI** - Title VI of the Civil Rights Act of 1964 (codified at 42 U.S.C. §2000D et seq.) prohibits discrimination on the basis of race, color or national origin by programs and activities receiving federal financial assistance.

B.3 Major Service Change Policy and Use

The Major Service Change Policy has been developed in compliance with applicable federal requirements (Title VI of the Civil Rights Act 1964, 49 CFR Section 21 and FTA Circular 4702.1B). All Major Service Changes will be subject to a Service Equity Analysis that includes an analysis of adverse effects, as previously defined, along with any associated positive impacts. Capital Metro shall consider the degree of adverse effects, and analyze those effects, when planning Major Service Changes. Additionally, when changes to service or fares involve improvements, the accrual of benefits should also be analyzed.

Capital Metro will conduct a Title VI Service Equity Analysis whenever there is a Major Service Change, as defined below.

A Major Service Change is defined as the following:

1. The establishment of new fixed-route bus route;
2. The elimination of any fixed-route bus or rail route in its entirety;
3. A geographic change on a given transit route of 25% or more of its annual revenue miles;
4. A change of 25% or greater in the number of annual revenue hours provided; or
5. Six months prior to the opening of any new fixed-guideway project (e.g. BRT line or rail line) regardless of whether or not the amount of service being changed meets the requirements above.

A Major Service Change is not defined as the following:

1. Temporary additions to service lasting less than 12 months;
2. Route renumbering with no underlying change;
3. Schedule or service adjustments required by a third party that operates or controls the same right-of-way (such as road closure);
4. New fixed-route bus or rail "Break in period" prior to the commencement of revenue service, lasting less than 12 months;
5. Emergency service adjustments associated with weather or other emergency conditions; or
6. Operations that result from circumstances beyond the control of Capital Metro (such as construction).

Capital Metro will conduct a Fare Equity Analysis under Title VI whenever a Fare Equity Analysis is required, as defined below.

A Fare Equity Analysis is required for the following:

- a. All fare changes, regardless of the percent of increase or decrease, are subject to a Fare Equity Analysis when contemplating a change; or
- b. For fare changes associated with the opening of a new fixed-guideway project, an equity analysis must be completed six months prior to the commencement of revenue service.

A Fare Equity Analysis is not required for the following exceptions:

- a. "Ozone Action Days" or other instances when Capital Metro has declared that all passengers ride free;
- b. Temporary fare reductions that are mitigating measures for other actions. For example, a reduced fare for passengers impacted by the temporary closure of a segment of a rail system for construction; or
- c. Promotional fare reductions. If a promotional or temporary fare reduction (such as response to emergency) lasts longer than six months, then FTA considers the fare reduction permanent and the transit provider must conduct a fare equity analysis.

Capital Metro will also conduct a Service Equity Analysis for changes which, when considered cumulatively over a three-year period, meet the Major Service Change threshold. For Major Service Changes, the Service Equity Analysis will assess the quantity and quality of service provided and populations affected.

Equity Analyses will be based on the most recent passenger survey data for fare analyses, and ridership or census block group data for service changes if ridership survey data is not appropriate for the analysis undertaken.

Each Title VI Equity Analysis will be presented to the Capital Metro Transit Authority Board of Directors for its consideration and the results will be included in the subsequent Capital Metro Title VI Program Update with a record of action taken by the Board.

B.4 Disparate Impact Policy and Use

The Disparate Impact Policy establishes a threshold that identifies when the adverse effects of a Major Service Change (defined above) as well as any fare changes, are borne disproportionately by minority populations (defined above), discovered through the conduct of a Service or Fare Equity Analysis.

Service and Fare Equity Analyses will compare existing service or fares to the proposed changes being contemplated, and calculate the absolute change as well as the percent change experienced by both minority and non-minority populations or riders.

For Service and Fare Equity Analyses, a Disparate Impact threshold of 2% will be used to determine if minority riders are more adversely affected, or less positively affected by the proposed change.

- Service or fare changes are determined to have a Disparate Impact on minority populations if the adverse impacts experienced by minority riders is greater than 2% when compared to the adverse impacts experienced by non-minority populations.
- Additionally, if benefits associated with service or fare changes accrue to non-minority populations greater than 2% when compared to minority populations, then this change will be determined to have a Disparate Impact.

B.4.1. Disparate Impact Mitigations

Should a proposed Major Service Change and/or Fare Change result in a Disparate Impact, Capital Metro will consider modifying the proposed change to avoid, minimize or mitigate the Disparate Impact of the change. If Capital Metro finds potential Disparate Impacts and then modifies the proposed changes in order to avoid, minimize, or mitigate Disparate Impacts, Capital Metro will reanalyze the proposed changes in order to determine whether the modifications actually removed the potential Disparate Impacts of the changes.

After analyzing proposed mitigations, if a less discriminatory alternative does not exist, Capital Metro may implement the proposed change only if:

- Capital Metro has a substantial legitimate justification for the proposed change; and
- Capital Metro can show that there are no alternatives that would have a less disparate impact on minority riders but would still accomplish Capital Metro's legitimate program goals.

Where disparate impacts are identified, Capital Metro will provide a meaningful opportunity for public comment on any proposed mitigation measures, including the less discriminatory alternatives that may be available.

B.5 Disparate Burden Policy and Use

The Disproportionate Burden Policy establishes a threshold that identifies when the adverse effects of a Major Service Change (defined above) as well as any fare changes are borne disproportionately by low-income populations, discovered through the conduct of a Service or Fare Equity Analysis. While low-income populations are not a protected class under Title VI, there is a recognized overlap in environmental justice principles and the FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes.

Equity Analyses will compare existing service or fares to the proposed changes and calculate the absolute change as well as the percent change experienced by both low-income and non low-income populations or riders.

For Service and Fare Equity Analyses, a Disproportionate Burden threshold of 2% will be used to determine if low-income riders are more adversely affected, or less positively affected, by the proposed change.

- Service or fare changes are determined to have a Disproportionate Burden on low income populations if the adverse impacts experienced by low-income riders is greater than 2% when compared to the adverse impacts experienced by non low-income populations.
- Additionally, if benefits associated with service or fare changes accrue to non low-income populations is greater than 2% when compared to low-income populations, then this change will be determined to have a Disparate Impact.

B.5.1. Disproportionate Burden Mitigations

Should a proposed Major Service Change and/or Fare Change result in a Disproportionate Burden, Capital Metro will take steps to avoid, minimize or mitigate impacts when practicable. Capital Metro should also describe the alternatives available to low-income riders affected by service changes.

Capital Metropolitan Transportation Authority
Board of Directors

MEETING DATE: 06/28/2021
(ID # 4872)

Contract for Benefits, Compensation and Retirement Consulting

Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract for benefits, compensation and retirement consulting services with Gallagher Benefits Services, Inc., in an amount not to exceed \$953,400.

**Capital Metropolitan Transportation Authority
Board of Directors**

MEETING DATE: 6/28/2021

(ID # AI-2021-1467)

Benefits, Compensation and Retirement Consulting

SUBJECT:

Approval of a resolution authorizing the President & CEO, or his designee, to finalize and execute a contract for benefits, compensation and retirement consulting services with Gallagher Benefits Services, Inc., in an amount not to exceed \$953,400.

FISCAL IMPACT:

Funding for this action is available in the FY2021 Operating Budget.

STRATEGIC PLAN:

Strategic Goal Alignment:

2. Engaged Workforce

Strategic Objectives:

2.1 Be an Employer of Choice.

EXPLANATION OF STRATEGIC ALIGNMENT: In order for Capital Metro to be an employer of choice and to attract and retain the best employees in the industry, we must provide total rewards that are competitive in the employment marketplace. This contract provides services across a wide range of employee compensation and benefits to support that objective.

BUSINESS CASE: Access to experts in employee compensation and benefits practices provides Capital Metro with support to understand and administer the complexities of compensation, health and other employee benefits and retirement programs as well as changes in related government regulations.

COMMITTEE RECOMMENDATION: This item will be presented to the full board on June 28, 2021.

EXECUTIVE SUMMARY: The current contract for Benefit, Retirement and Compensation Plan Consulting services ends on August 12, 2021. Gallagher Benefits Services, Inc. is the current vendor providing these services. Due to the complexities of benefit, retirement and compensation administration and compliance with government regulations and laws, it is recommended that the Authority obtain services from experts in these areas. Under this contract, consulting services will be provided to ensure that the Authority is in compliance with current and any new federal laws and regulations as well as maintain a diverse total reward program that will assist in attracting and retaining top talent for future success.



The benefit, compensation and retirement consulting services to be provided include but are not limited to:

- A comprehensive annual review of the current health benefits, compensation and retirement plans and employee benefit requirements to determine adequacy and appropriateness of coverage, pricing, premium development, projected cost determination for fiscal year budgeting, federal and state compliance, trend comparisons and market competitiveness.
- Assistance in the preparation and review of Requests for Proposals as needed for health plan and retirement plan administrators, financial investment advisement and other related contracts.
- Technical assistance and marketing advice as requested for plan changes and special programs as needed.
- Monitoring of current benefit programs to ensure compliance to contracts and service agreements.
- Actuarial services as needed for retiree health program and pension benefits.
- A biennial compensation review of the pay ranges for benchmark positions to maintain internal and external equity.
- Web based salary survey tools to allow management review of current salary data as needed for special reviews.

DBE/SBE PARTICIPATION: No SBE goal is assigned to this procurement due to limited subcontracting opportunities. We have discussed with the selected vendor a commitment towards small business participation. However, due to many proprietary elements in this project, there is no opportunity for any race/gender neutral SBE participation. However, the vendor has a commitment to a supplier diversity program that applies to many other projects they are involved in.

PROCUREMENT: On 12/18/2020, a Request for Proposals was issued and formally advertised on Planet Bids. By the closing date of 1/19/2021, two (2) proposals were received. The Evaluation Factors used were:

- (1) The offeror's demonstrated understanding of the project undertaking, the proposed plan for the performance of the work and the technical approach proposed by the offeror.
- (2) The offeror's demonstrated, relevant work experience and capabilities of the firm as a whole, on projects of a similar size, scope, complexity and nature, and qualifications of the proposed personnel.



(3) Offeror's Staffing Plan demonstrates that it provides necessary coverage and resources to perform the services identified in Exhibit F, Scope of Services.

Gallagher Benefit Services, Inc., was rated highest, all factors considered. The price was determined to be fair and reasonable based on adequate competition. The contract is a fixed price type contract. The term of the contract is two (2) base years with four (4) option periods of one year each.

Base Period 1, Contract Year 1	\$158,900.00
Base Period 2, Contract Year 2	\$158,900.00
Option Period 1, Contract Year 3	\$158,900.00
Option Period 2, Contract Year 4	\$158,900.00
Option Period 3, Contract Year 5	\$158,900.00
Option Period 4, Contract Year 6	\$158,900.00
Total Base and Options (6 Years)	\$953,400.00

RESPONSIBLE DEPARTMENT: Human Resources



**RESOLUTION
OF THE
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS**

**STATE OF TEXAS
COUNTY OF TRAVIS**

**RESOLUTION (ID # AI-2021-1467)
Benefits, Compensation and Retirement Consulting**

WHEREAS, the Capital Metropolitan Transportation Authority Board of Directors and Capital Metro management recognize the need for benefit, compensation and retirement consulting services to ensure compliance with all government regulations and laws.

NOW, THEREFORE, BE IT RESOLVED by the Capital Metropolitan Transportation Authority Board of Directors that the President & CEO, or his designee, is authorized to finalize and execute a contract for Benefit, Compensation and Retirement Consulting services with Gallagher Benefits Services, Inc., in an amount not to exceed \$953,400. The term of the contract is two (2) base years and four (4) option year periods of one (1) year each.

**Secretary of the Board
Eric Stratton**

Date: _____

Attachment: Resolution-AI-2021-1467 (4872 : Contract for Benefits, Compensation and Retirement Consulting)

**Capital Metropolitan Transportation Authority
Board of Directors**

**MEETING DATE: 06/28/2021
(ID # 4873)**

Appointment to Capital Metro Investment Committee

Approval of a resolution appointing Catherine Walker, Chief Financial & Risk Officer, to the Capital Metro Investment Committee as an investment officer, with the authorization to withdraw, invest, reinvest, and accept payment with interest, consistent with the investment policy.

**Capital Metropolitan Transportation Authority
Board of Directors**

**MEETING DATE: 6/28/2021
(ID # AI-2021-1459)
Investment Committee Replacement**

SUBJECT:

Approval of a resolution appointing Catherine Walker, Chief Financial & Risk Officer, to the Capital Metro Investment Committee as an investment officer, with the authorization to withdraw, invest, reinvest, and accept payment with interest, consistent with the investment policy.

FISCAL IMPACT:

This action has no fiscal impact.

STRATEGIC PLAN:

Strategic Goal Alignment:

5. Finance

Strategic Objectives:

5.1 Continue improvement of the financial systems of the agency.

EXPLANATION OF STRATEGIC ALIGNMENT:

This appointment ensures that Capital Metro is in compliance with its investment policy.

BUSINESS CASE:

This appointment ensures that Capital Metro is in compliance with its investment policy.

COMMITTEE RECOMMENDATION:

This agenda item will be presented to the full board on June 28, 2021.

EXECUTIVE SUMMARY:

Capital Metro's investment policy provides for the delegation of authority to invest Capital Metro funds and the execution of any documentation necessary to evidence the investment of Capital Metro funds to the investment advisory firm under current contract (PFM Asset Management LLC) and those Capital Metro personnel authorized as investment officers. The policy further provides that Capital Metro's Board of Directors will designate in writing those Capital Metro personnel serving as investment officers and authorized to invest on behalf of Capital Metro. These designated investment officers shall perform their duties in accordance with the investment policy adopted annually by the Board of Directors. The investment officers form an investment



committee that meets quarterly with the investment advisory firm to review performance results. The investment policy dictates the type of investments that can be made and the maximum percentages of the portfolio for each type of investment. Decisions on how to invest Capital Metro's funds are made with the advice of the investment advisory firm and concurrence from the investment committee.

DBE/SBE PARTICIPATION: Does not apply.

PROCUREMENT: Does not apply.

RESPONSIBLE DEPARTMENT: Finance



**RESOLUTION
OF THE
CAPITAL METROPOLITAN TRANSPORTATION AUTHORITY
BOARD OF DIRECTORS**

STATE OF TEXAS

COUNTY OF TRAVIS

**RESOLUTION (ID # AI-2021-1459)
Investment Committee Replacement**

WHEREAS, the Capital Metropolitan Transportation Authority Board of Directors is required by Capital Metro's investment policy to designate in writing investment officers to invest on behalf of Capital Metro with the advice of Capital Metro's investment advisory firm under contract.

NOW, THEREFORE, BE IT RESOLVED by the Capital Metropolitan Transportation Authority Board of Directors that Catherine Walker, Chief Financial & Risk Officer, is hereby appointed as an investment officer to the Capital Metro Investment Committee and is authorized to withdraw, invest, reinvest and accept payment with interest consistent with the investment policy.

**Secretary of the Board
Eric Stratton**

Date: _____

Attachment: Resolution-AI-2021-1459 (4873 : Appointment to Capital Metro Investment Committee)

Capital Metropolitan Transportation Authority MEETING DATE: 06/28/2021

Board of Directors

(ID # 4874)

**Initial Review and Discussion of FY2022
Budget**

TITLE: Initial Review and Discussion of FY2022 Budget

FY2022 Budget Development Update


Presented on June 16, 2021

1



METRO

FY2022 Budget Development Calendar

- Feb 4 Operating and Capital Budget kick-off meeting with departments
- Apr 16 Capital and Operating Budget requests received from departments
- May 12 Board Committees review proposed budget calendar
- Jun 2 Initial review with Access Advisory Committee
- Jun 9 Initial review with Customer Satisfaction Advisory Committee
-  Jun 16 Board Committees initial review and discussion
- Jul 14 Budget proposal presented to Board Committees
- Jul 19 Budget proposal presented to Board of Directors

FY2022 Budget Development Calendar

PUBLIC OUTREACH / FEEDBACK PROCESS

- Aug 4 Presentation to Access Advisory Committee
- Aug 11 Presentation to Customer Satisfaction Advisory Committee
- Aug 23-27 Public outreach either virtually or at transit centers and rail stations
- Aug 24 Proposed budget document is published online
- Aug 24 Notice of public hearing on proposed budget and capital improvement plan
- Sep 15 Update Board Committees
- Sep 15 Public hearing on proposed budget and capital improvement plan at noon
- Sep 27 Board of Directors considers budget proposal for adoption

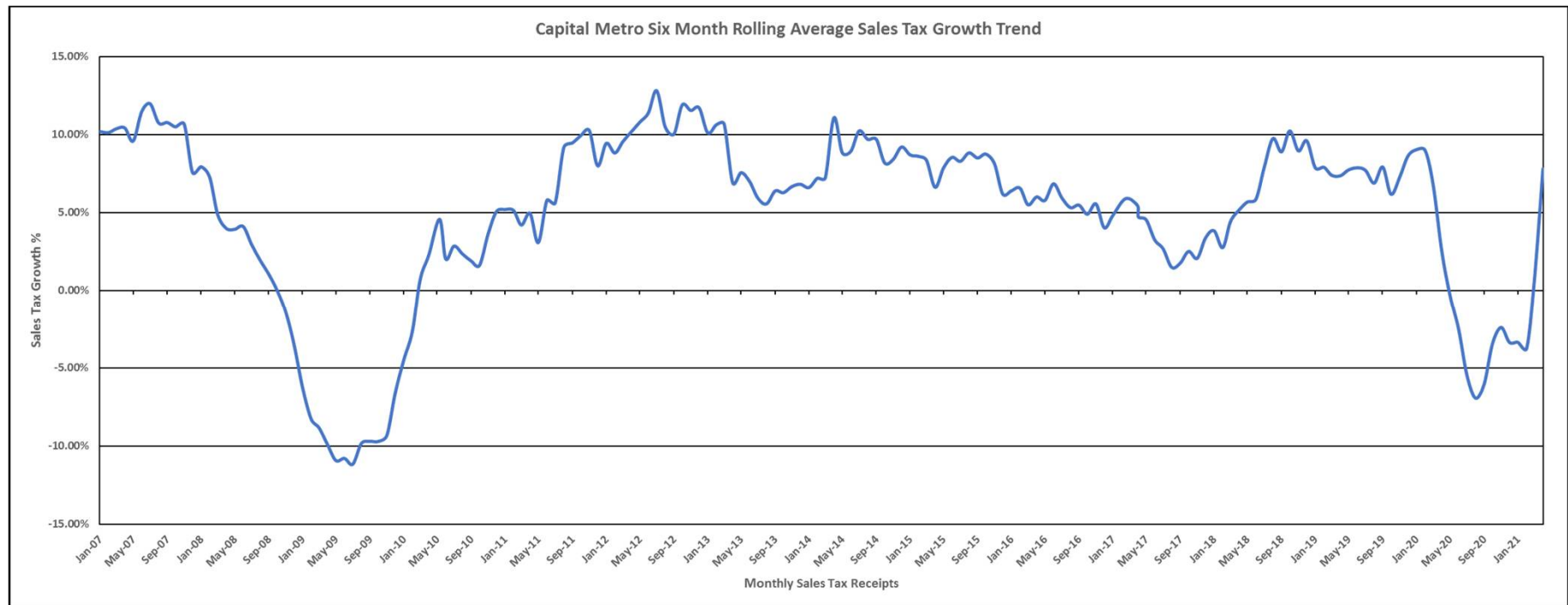


Discussion Outline

- Key FY2022 budget assumptions
- Major operating budget assumptions
 - Revenue and cost drivers
- Service priorities and funding
- Capital Improvement Plan update
- Long-Range Financial Model used to balance operating and capital budget requests against estimated available funds over 5-year period and long-term outlook



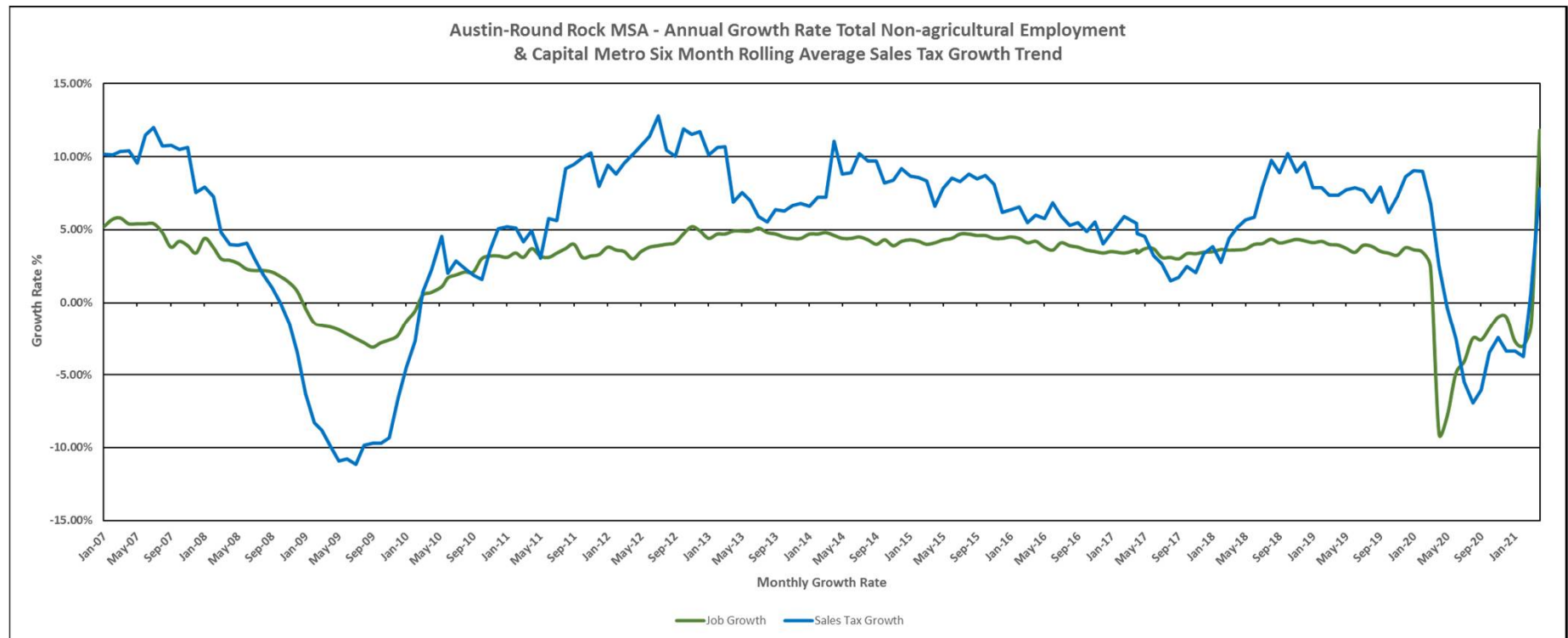
Sales Tax Growth



Projected sales tax growth for Fiscal Years 2021 and 2022 to be determined based on upcoming sales tax receipts.
Year to Date April 2021 sales taxes increased by 5% compared to the last fiscal period.



Job Growth



6


METRO

The Austin-Round Rock MSA annual growth rate improved to 11.8 percent in April 2021

Operating Revenue

- Fare Revenue
 - Fare revenue to be developed with updated ridership projections
 - No fare increase proposed for FY2022
- Federal Grants
 - Approximately \$33.7 million annually in Section 5307 funds
 - CRRSAA funding of \$66.2 million awarded in January 2021
 - American Rescue Plan Act funding of \$128.2 million awarded in March 2021
- Freight Railroad Revenue on target with budget estimates
 - Mainline Revenue on target with FY2021 Budget
 - Section 45G Railroad Track Maintenance Tax Credit of ~ \$545 thousand



Operating Expenses

- Service levels based on August Service Plan changes
- Fuel prices to remain stable over the next fiscal year with hedging in place
 - Estimate of \$1.90 per gallon, net of hedging activities
- 3.0% average annualized pay increase for employees
 - Performance-based program that represents an average cost across the agency
- New position requests under review by Senior Management Team
- Strategic plan initiatives considered in budget preparation



Capital Budget Highlights

- Electric bus purchases and infrastructure construction
- Broadmoor rail development
- Bus stop enhancements
- Railroad state of good repair
- ERP system replacement
- Customer experience technology enhancements
- Demand Response van replacements and fleet expansion



Project Connect Highlights

- Implementation of Interlocal Agreement for staffing and support services
- MetroRapid Lines
 - Stations, electric charging and vehicles
- MetroExpress Park & Rides
- New Pickup Zones operations
- Red Line improvements
 - Broadmoor Station, McKalla-MLS Station and Lakeline-Leander Siding
- Organizational development and operational readiness





METRO

THANK YOU!

Capital Metropolitan Transportation Authority
Board of Directors

MEETING DATE: 06/28/2021

(ID # 4890)

August 2021 Service Changes

TITLE: August 2021 Service Changes

August 2021 Service Changes

Roberto Gonzalez
Director, Service Planning

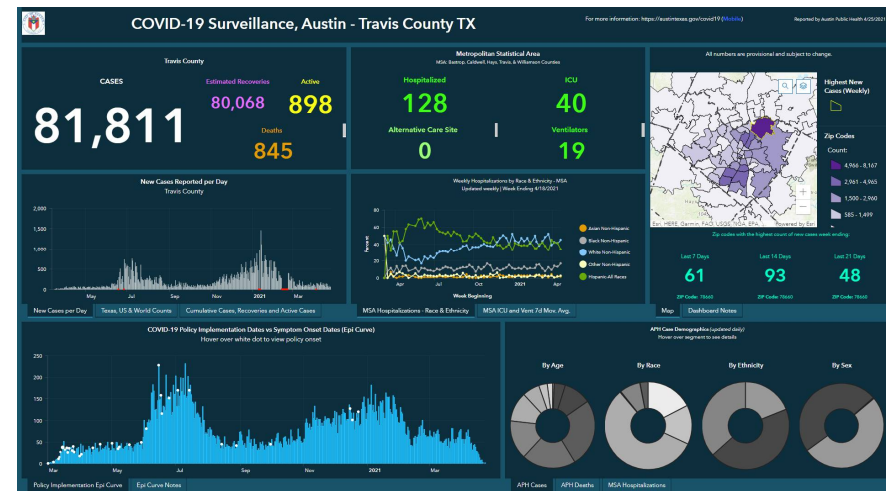
Discussion Item - Informational
June 2021 Board Meeting

1

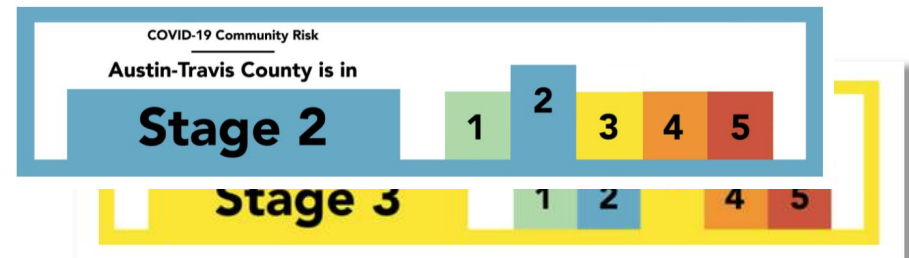
**METRO**

Covid-19 Current Conditions

- **COVID** - Growing positive outlook for community. Precautions still in place for Travis County, City of Austin, Capital Metro and major stakeholders (State, UT and AISD).
- **Vaccinations** - Increase in availability and prioritization. Most adults and most teens could be vaccinated by Fall (children over 12 now eligible)
- **Employment** - State Office complex confirmed offices will return by September 1st. Private Downtown employers still not fully committed to return.



Travis County Moved to Stage 2 on May 18th, 2021



Covid-19 Current Conditions

- **University of Texas / AISD** - Working through details for the Fall (expectation of full return with all students eligible for vaccinations)
- **Resources and Manpower** – Services operating on COVID levels with future changes anticipated to meet demand



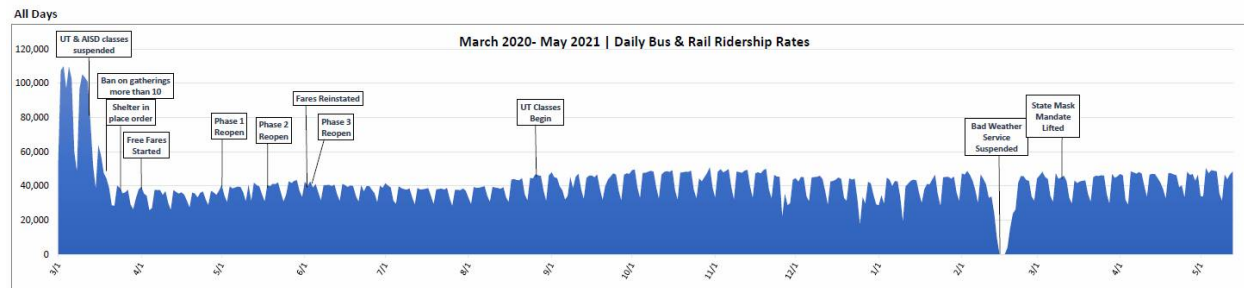
Covid-19 Current Conditions

- **System Ridership** – holding steady during previous 6 months
- **Commuter** - Rail and Express/Flyers down over 90%
- **High Frequency/Local Network** - down 50% but holding steady
- **UT Routes** - down 75%
- **Late Night** - Night Owls and E-bus (currently suspended)

Cumulative riders Bus, Rail Rapid March 23, 2020 – May 13, 2021
16,354,959

Last 8 Days Ridership

Category	Pre-Covid			Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu
	May 2019	May 2019	May 2019								
Express	2,894	-	-	121	128	-	-	141	141	161	134
Local	66,987	46,852	39,486	38,199	38,198	30,093	25,737	36,342	34,437	36,443	37,434
Rail	2,850	2,012	-	756	740	-	-	836	711	706	776
Rapid	15,802	10,620	8,421	7,939	7,785	5,364	5,140	7,609	6,839	7,614	8,162
UT Shuttle	7,763	2,246	443	1,821	1,655	-	343	1,581	1,682	1,799	1,985
Grand Total	96,296	61,731	48,349	48,836	48,506	35,457	31,220	46,509	43,810	46,723	48,491
Express				-95.8%	-95.6%			-95.1%	-95.1%	-94.4%	-95.4%
Local				-43.0%	-43.0%	-35.8%	-34.8%	-45.7%	-48.6%	-45.6%	-44.1%
Rail				-73.5%	-74.0%	-100.0%		-70.7%	-75.1%	-75.2%	-72.8%
Rapid				-49.8%	-50.7%	-49.5%	-39.0%	-51.8%	-56.7%	-51.8%	-48.3%
UT Shuttle				-76.5%	-78.7%	-100.0%	-22.5%	-79.6%	-78.3%	-76.8%	-74.4%
Grand Total				-49.3%	-49.6%	-42.6%	-35.4%	-51.7%	-54.5%	-51.5%	-49.6%



Current Service Levels

Routes at Pre-COVID Service Levels

- High Frequency Network
- MetroRapids
- Local Routes

Routes with Limited Service

- Express Routes
- Flyers
- UT Shuttles
- MetroRail
- PickUp

Suspended Routes

- MetroExpress 980, 981, & 987
- Night Owls
- E-Bus



Recommended August Service Levels

Routes at Pre-COVID Service Levels

- High Frequency Network - no change
- MetroRapid - Weekday Evenings (8pm to 10pm) to 15-min vs 20-min / Resume Late Night Thursday, Friday and Saturday to 3am
- Local Routes - no change

Routes with Limited Service

- Express Routes – resume Route 980 with limited 1 AM/PM trip
- Flyers - no change
- UT Shuttles - resume Regular Fall levels (Weekdays, Registration, Finals and Sundays)
- MetroRail - resume Friday Late Night / continue with Saturdays (Regular and Special Event MLS)
- PickUp – resume Saturday service on Northeast ATX and East ATX / introduce Saturday service on Walnut Creek and Leander

Suspended Routes

- MetroExpress 981 & 987 – remain suspended (exception of Route 980 to resume with limited service)
- Night Owls - resume Regular late-night service
- E-Bus – likely resume Regular Thursday, Friday and Saturday service (contingent on UT fall return)





METRO

THANK YOU!

Capital Metropolitan Transportation Authority
Board of Directors

MEETING DATE: 06/28/2021

(ID # 4892)

Sustainability Climate Plan

TITLE: Sustainability Climate Plan

CapMetro Sustainability Vision



1

 **METRO**

Sustainability Plan – Why now?

- Integrate sustainability into Project Connect planning
- Necessary to guide Capital Metro fleet and facilities operations and capital improvements
- New! Federal Transit Administration Sustainable Transit for a Healthy Planet Challenge – June 15 through April 2022



Timeline

draft subject to change



Internal Action Plans will be updated annually to inform budget.
After adoption, Annual Report on Sustainability will be produced.

Elements of the Plan

Sustainability Vision Plan and Climate Leadership Policy

- Establish goals and reporting requirements
- Align with CMTA Strategic Plan; a route map to APTA Sustainability Platinum Level
- Transparent to the community

Internal Action Plans

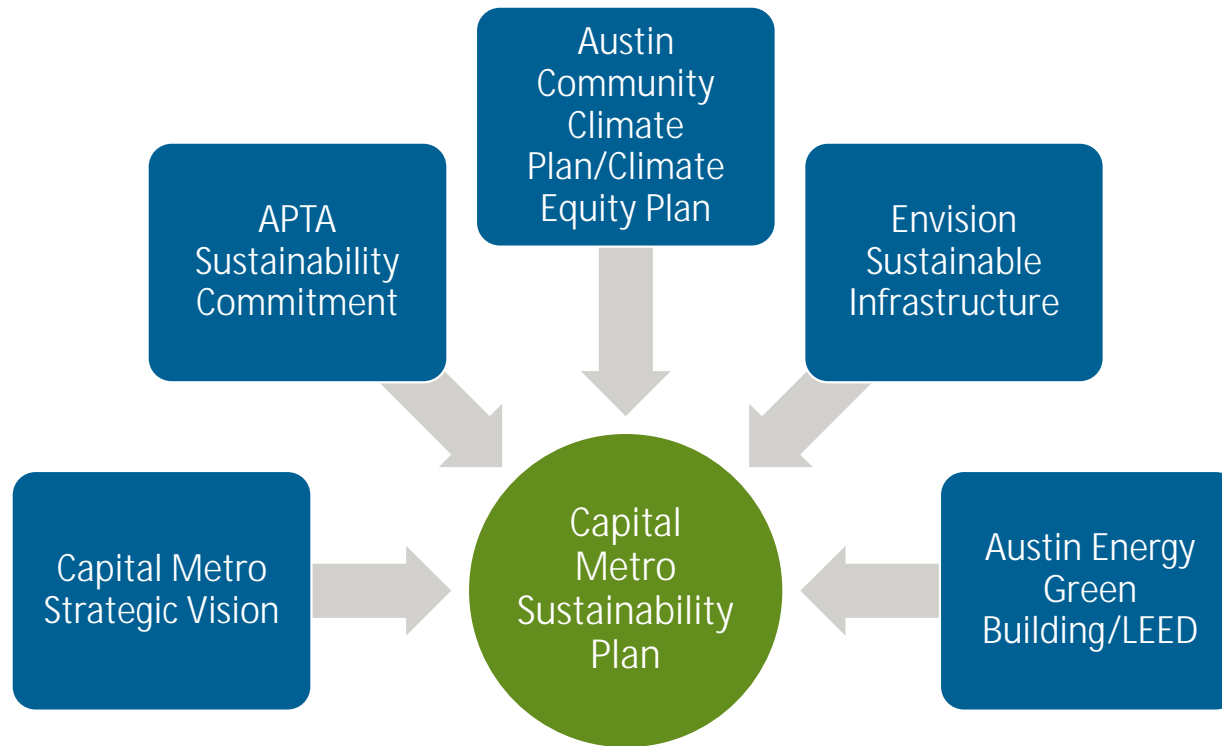
- Set department-level sustainability goals and commitments
- Identify strategies and track action items
- Monitor and report metrics on GHG/Carbon, Air Emissions, Energy, Water, Waste/Reuse
- Establish departmental leads and responsibilities

Annual Report

- Report metrics and key activities
- Track APTA Sustainability Commitment
- Available to the community and stakeholders

Sustainability Guiding Frameworks

Building on existing programs



Sustainability Plan Structure

Internal Action Plans

Adopted Sustainability Vision Plan

Energy and
Climate

Transportation
and Fuel

Zero Waste

Water and
Natural World

Active
Transportation

Financing and
Procurement

Staff Action Plans will contain specific owners, strategies, timelines and metrics.

Plan Implementation and Support

Proposed leadership structure

Capital Metro Board of Directors

- Adopt Sustainability Vision Plan

Senior Management Team (Internal)

- Approve goals

Sustainability Leadership Committee (Capital Metro & ATP)

- Implement Sustainability Vision Plan and Action Plans
- Led by Sustainability Officer

Sustainability Work Group (External)

- Regional sustainability partners; Transit sustainability peers
- Guide implementation, collaboration, exchange knowledge and experience

Green Team and Sustainability Contractor

- Support leadership staff committee in implementation and communication efforts
- Assist the Sustainability Officer in developing and coordinating plans and tools for implementation



Sustainability Focus Areas and Examples

Energy and Climate

- Green Choice and clean energy LEED planning
- Austin Energy Green Building program

Transportation and Fuel

- Zero emission fleets
- Agency ZEV transition plan

Zero Waste

- Construction waste recycling
- Re-purposing materials and surplus materials program

8

**METRO**

Attachment: Sustainability-ClimatePlan - BCredits (4892 : Sustainability Climate Plan)

Sustainability Focus Areas and Examples

Water and Natural World

- Envision Sustainable Infrastructure project management
- Native plants and regenerative landscaping

Active Transportation and Mobility

- MetroBike: shared e-bikes, shelters, bike amenities
- Station and stop connectivity

Financing and Procurement

- Establish Sustainability Capital Fund (FY22)
- Identify applicable grants, rebates, financing mechanism
- Integrate sustainability goals into purchasing and procurement

9



METRO



Next Steps

- Onboard consultant to assist with Vision Plan and alignment of Staff Action Plans
- Engage stakeholders (our partners and the community)
- Board action to adopt Vision Plan – 2022



METRO

THANK YOU!

Capital Metropolitan Transportation Authority MEETING DATE: 06/28/2021

Board of Directors

(ID # 4893)

**Public Transportation Agency Safety Plan
(PTASP) Annual Review**

TITLE: Public Transportation Agency Safety Plan (PTASP) Annual Review

Public Transportation Agency Safety Plan Review

Capital Metro Board Meeting
Monday, June 28, 2021

1

**METRO**

To Whom Does The PTASP Apply?




- Recipients or sub-recipients of financial assistance under 49 USC § 5307 that operate a public transportation system
- Large bus operators (operating more than 100 vehicles in peak revenue service)
- Rail transit agencies
- Small bus operators

PTASP Effective

- July 2019 – Effective Date of law
- July 2020 – Implementation Date
- December 2020 & July 2021
FTA utilized discretion to extend enforcement deadline due to COVID-19
- May 2020 - Capital Metro PTASP approved by Board of Directors
- September 2020 - FTA certified CapMetro PTASP for use

Employee Reporting Systems (ERS)



Serious About Safety!

REPORT YOUR SAFETY CONCERN

Voice your concern here:

Call this number: “Safety Reporting” Hotline at (512)852-SAFE provides a way for you to leave a message anonymously, with or without contact information.

or

Report Online: <https://app.capmetro.org/safety>



PTASP | General Plan Requirements



- Approval by the agency's Accountable Executive and Board of Directors (or equivalent)
- Chief Safety Officer Designation
- CapMetro Safety Management Systems Established and Documented
- Employee Safety Reporting System Program Created

Safety Management Systems

- Safety Management Systems (SMS) is a formal, top-down, organization-wide approach to managing safety risks and assuring the effectiveness of safety risk mitigations. SMS helps a transit agency focus its safety management efforts by ensuring that:
 - Senior management has access to the information necessary to strategically allocate resources to address safety concerns
 - Lines of safety decision-making accountability are established throughout the organization to promote a proactive safety culture
 - Address organizational factors that may lead to safety breakdowns, identify system-wide trends in safety, and manage hazards before they result in accidents or incidents

SMS Principles



Safety Management Policy Requirements



- Signed by the highest executive in the agency, and board of directors.
- Clear statement about the provision of resources for the management of safety necessary for service delivery.
- Safety reporting procedures.
- Conditions under which exemptions from disciplinary action would be applicable.
- Unacceptable operational behaviors.
- Communication, with visible endorsement, throughout the transit agency.

Safety Risk Management



Identify hazards



Assess hazards and associated risks



Mitigate hazards, reduce risk



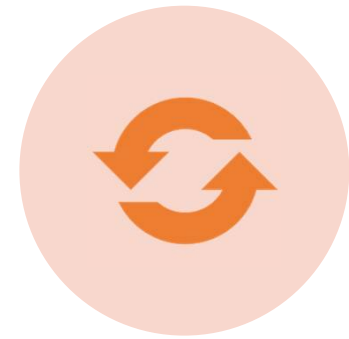
Safety Assurance



MONITOR AND MEASURE
SAFETY PERFORMANCE




MANAGEMENT OF
CHANGE



CONTINUOUS
IMPROVEMENT

Safety Promotion

- Comprehensive safety training program
- Safety communication


Safety Bulletin

Issue Date: June 5, 2020
 Bulletin No.: SRA-SB-014-2020

SUBJECT: Heat Advisory

The National Weather Service (NWS) has issued an Excessive Heat Warning for the Austin area that will be in effect for the next several days. As such, we have the following related information and safety tips.

Heat-Related Disorders	
Heat stroke occurs when the body no longer sweats, and body temperature reaches dangerous levels. Symptoms of heat stroke include: <ul style="list-style-type: none"> • Dry, hot reddish skin and lack of sweating • High body temperature • Strong, rapid pulse • Chills • Confusion • Slurred speech 	Heat exhaustion is the body's response to the loss of water and salt, typically through sweating. Symptoms of heat exhaustion include: <ul style="list-style-type: none"> • Excessive sweating • Weakness or fatigue • Dizziness and/or confusion • Clammy skin • Muscle cramps • Flushed complexion
Heat cramps are painful cramps in the body's muscles due to low salt levels and are typically caused by excessive sweating. Symptoms of heat cramps include: <ul style="list-style-type: none"> • Muscle pain usually in the abdomen, arm, or legs • Muscle spasms usually in the abdomen, arm, or legs 	Heat rash is an irritation of the skin caused by excessive sweating. Symptoms of heat rash include: <ul style="list-style-type: none"> • Red cluster of pimples or small blisters • Usually on neck and upper chest, groin area, under the breasts, and in elbow creases

Ten Hot Weather Safety Tips:

1. **Stay hydrated.** Drink plenty of fluids; drink about 16 ounces before starting and 5 to 7 ounces every 15 to 20 minutes.
2. **Avoid dehydrating liquids.** Alcohol, coffee, tea, and caffeinated soft drinks can hurt more than help.
3. **Wear protective clothing.** Lightweight, light-colored, and loose-fitting clothing helps protect against heat. Change clothing if it gets completely saturated.
4. **Pace yourself.** Slow down and work at an even pace. Know your own limits and ability to work safely in heat.
5. **Schedule frequent breaks.** Take time for rest periods and water breaks in a shaded or air-conditioned area.
6. **Use a damp rag.** Wipe your face or put it around your neck.
7. **Avoid getting sunburn.** Use sunscreen and wear a hat if working outside.
8. **Be alert to signs of heat-related illness.** Know what to look for and check on other workers that might be at high risk.
9. **Avoid direct sun.** Find shade or block out the sun if possible.
10. **Eat smaller meals.** Eat fruits high in fiber and natural juice. Avoid high protein foods.

Gardner C. Tabon – Vice President, Chief Safety Officer Page 1 of 1





METRO

THANK YOU!

Capital Metropolitan Transportation Authority MEETING DATE: 06/28/2021
Board of Directors (ID # 4891)
Project Connect Orange Line Update

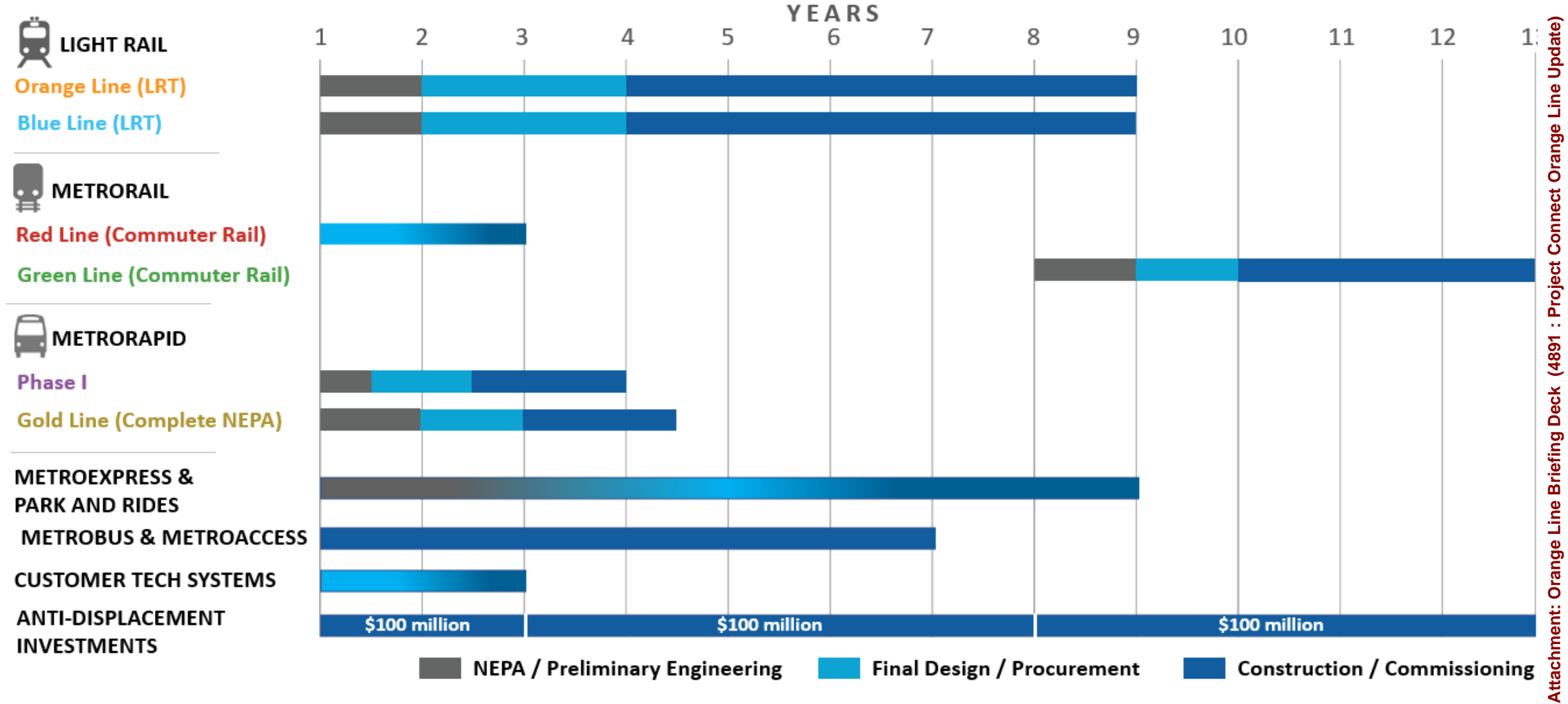
TITLE: Project Connect Orange Line Update

PROJECT CONNECT OVERVIEW

ORANGE LINE ALIGNMENT BRIEFING

SOUTH: SLAUGHTER to OLTORF
NORTH: TECH RIDGE to the DRAG

Program Sequence Plan



PROGRAM UPDATES:

Red Line & Pick-Up Service

Red Line

McKalla Station

- Preliminary engineering & ENV in progress
- Safety analysis underway
- Ongoing coordination with City of Austin

Broadmoor Station

- Ongoing coordination with station neighbors regarding drainage, and construction easements
- Coordination with Urban Trail team on Red Line Trail

Lakeline-to-Leander

- Construction bidding in progress

Park & Rides

Under planning review

Neighborhood Circulators

- First of the three zones (Dessau) goes live on June 15th
- In-depth community engagement has begun for the remaining two zones, being launched this summer
- Public-facing dashboards in development for a late summer release



PROGRAM UPDATES:

MetroRapid

Expo & Pleasant Valley

- Published in the *FY22 Annual Report on Funding Recommendations*
- Project Management Oversight Consultant (PMOC) assigned by FTA
- Categorical Exclusion (CE) approved by FTA
- Completed 30% design
- 100% design consultant selected and NTP forthcoming
- Progressed FTA Small Starts Readiness Documents
- Continued station location and guideway coordination with the City of Austin (ATD and CPO)
- Bus procurement underway, anticipate Board action in September

Gold Line, Menchaca, South Lamar / Oak Hill

- Conducted station site visits and operational discussions;
- Developing 30% design scope
- Analyzing options for federal funding and project implementation phasing

PROGRAM UPDATES:

Blue & Orange Line Field & Engineering Activities

- Blue Line 15% Draft Design Package comment disposition completed and revisions for final submittal underway
- Orange Line 15% Draft Design Package submitted and conducted reviews with technical stakeholders
- Surveys complete for geotechnical boring locations
- Completed drilling for 7 out of 10 borings for tunnel
- Archeological and environmental field investigation underway
- Continued coordination with City on guideway, roadway, bike/ ped facilities and planned development ongoing



5.5.a

Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

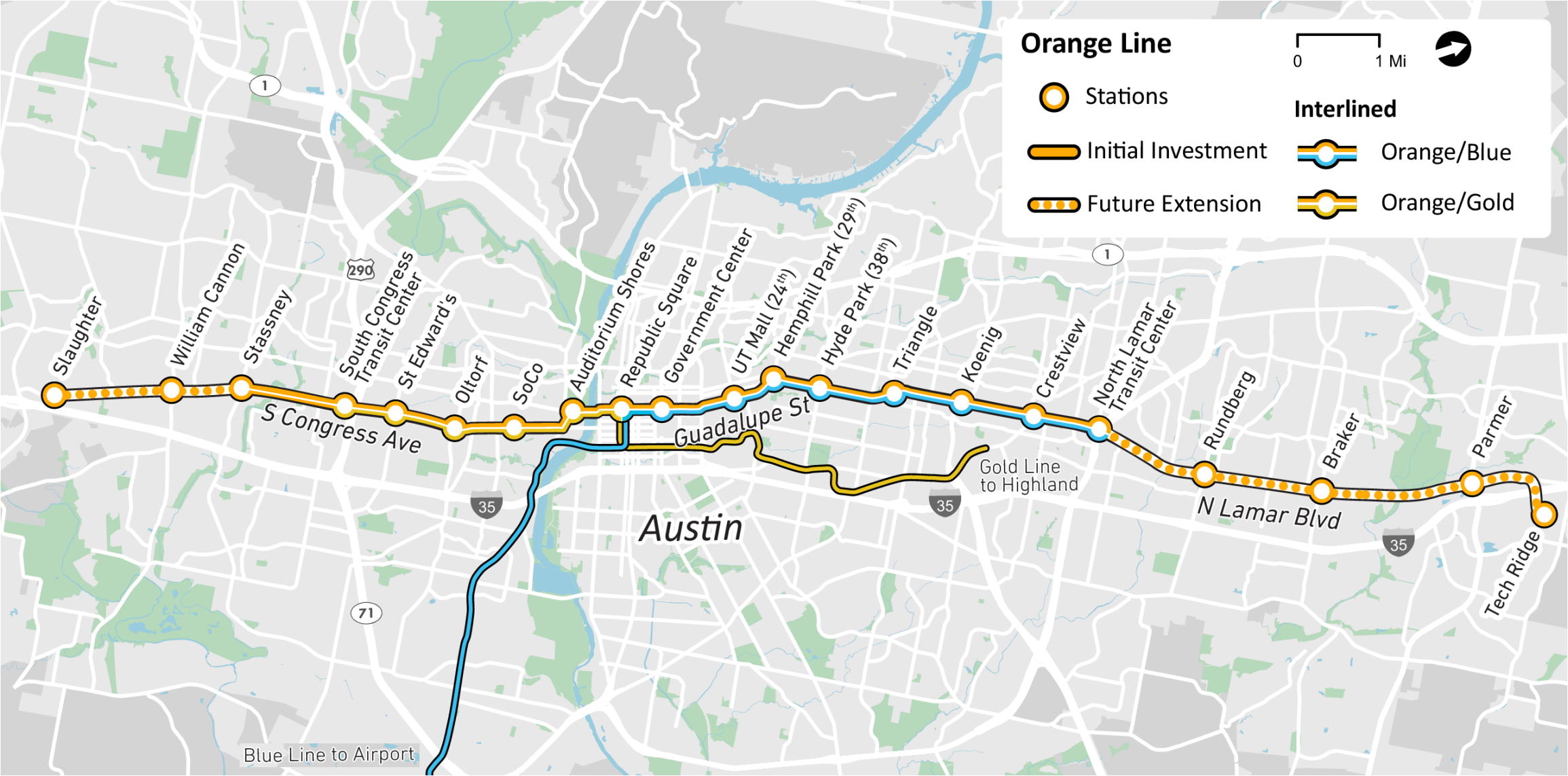
PROGRAM UPDATES:

Blue & Orange Planning/NEPA Progress

- Notice of Intent Published
- Submitted Entry into Project Development Letter
- Continue to develop various Resource Technical Reports
- Drafting EIS Document
 - Chapter 1 – Introduction, Description, Purpose and Need
 - Chapter 2 – Alternatives Considered
 - Overall, there are 7 Chapters and numerous sections and reports that comprise the EIS
- Continued coordination with Agencies and Partners



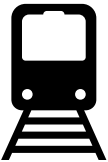
Orange Line Stations



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Alignment Briefing Sequence

MAY

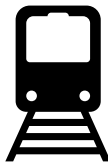


BLUE LINE



Airport to Lady Bird Lake

JUNE



ORANGE LINE

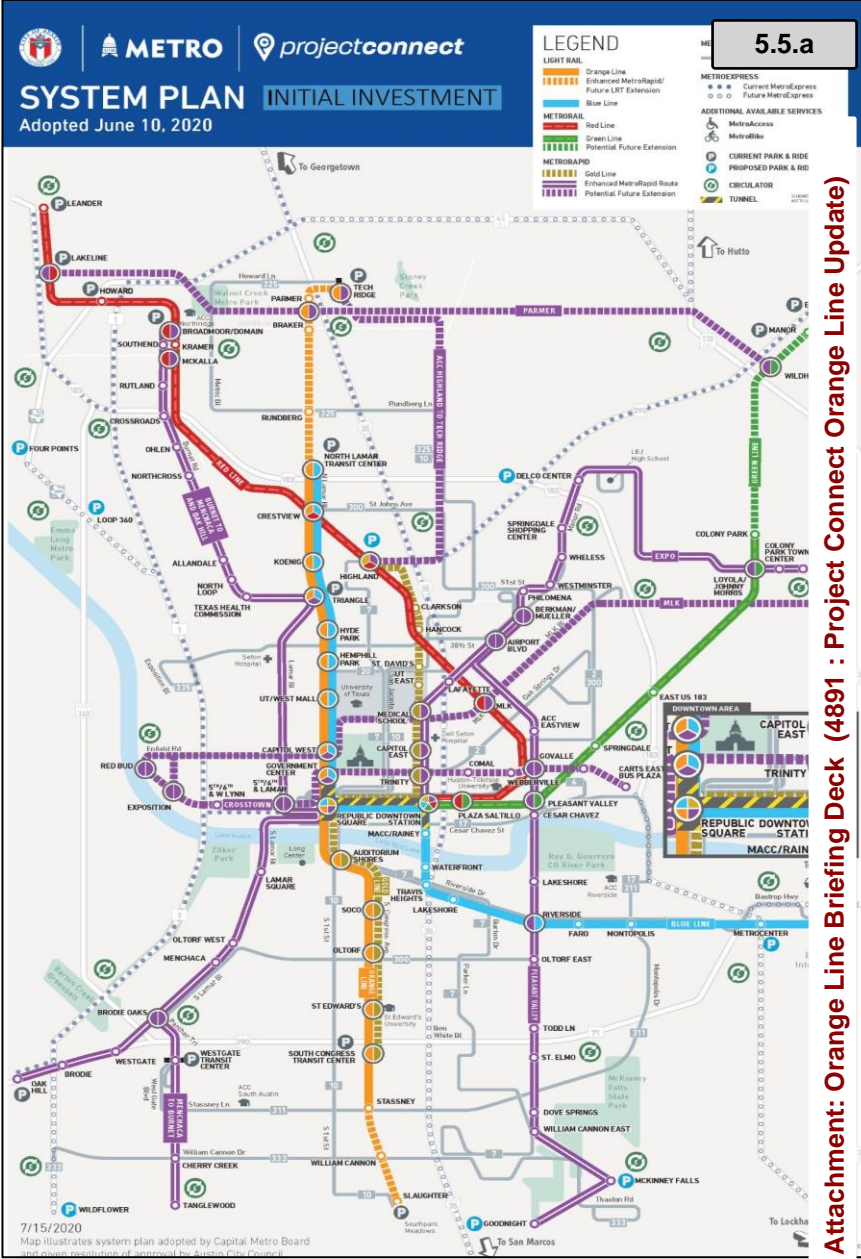


South: Slaughter to Oltorf
North: Tech Ridge to the Drag

JULY

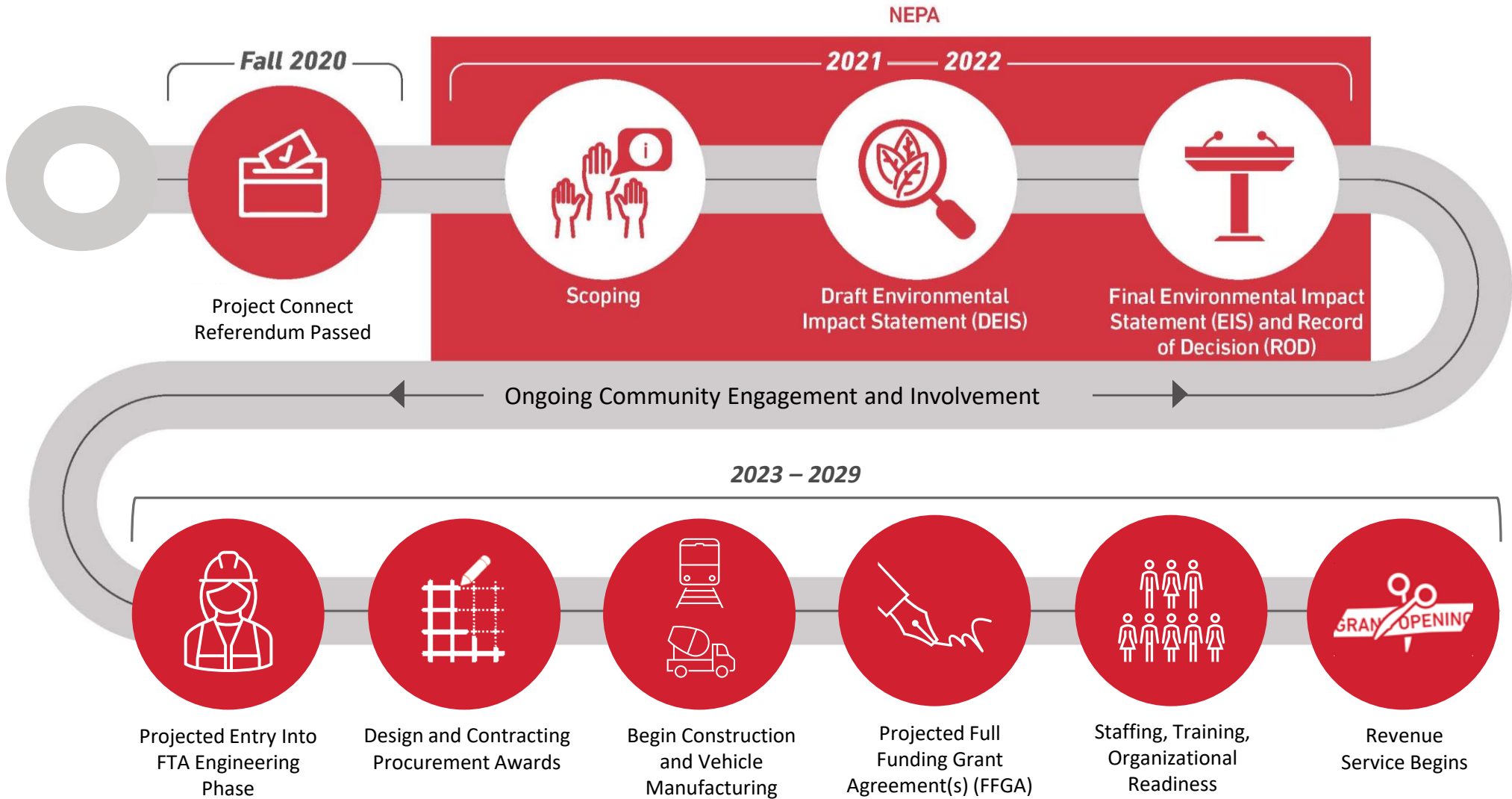


Downtown - SoCo

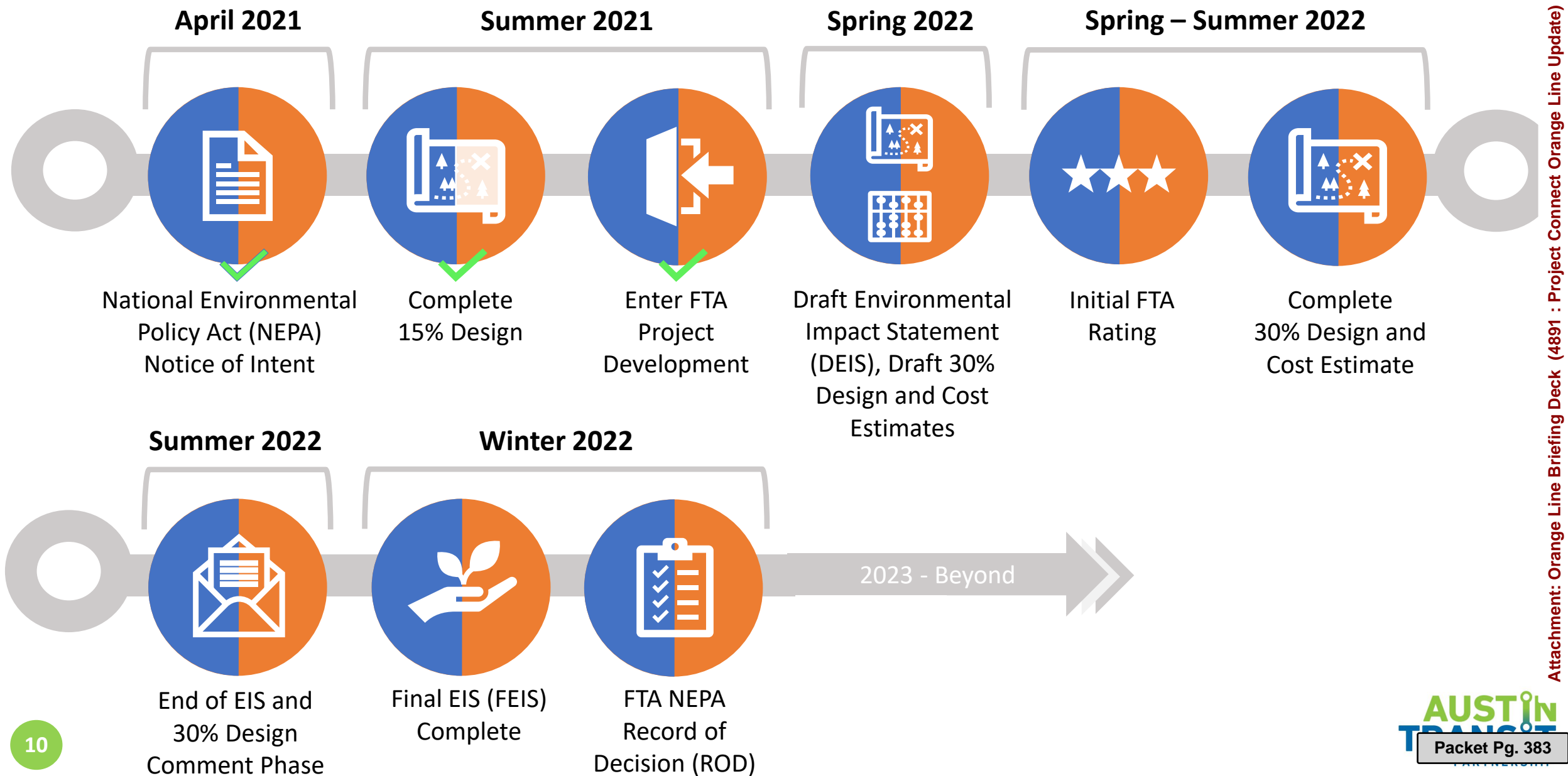


Orange & Blue Line Projects – Overall Timeline

June 2020
Orange & Blue Line
Locally Preferred
Alternatives (LPAs)
Adopted



Orange & Blue Line Key Milestones (2021 – 2022)



Community Engagement Updates

- “Let’s Talk Station Alignment” virtual community meetings
April 26-May 21 final numbers:

Event Participation	Totals
Total Live Meeting Views	293
Total Self-Guided Meeting Unique Users	1,235
Total Participation	1,528

- CAC Meeting May 26
- PCAN Meeting May 27
- Blue Line Working Groups May 24
- Orange Line Working Groups June 7-10



***What do you love about your community?
How do you think a new station could be
designed to reflect what you love about
your community?***

- “Stations should feature local art and be context sensitive (locally sourced colors/materials where possible); they need substantial shade structures designed to maximize shade in the hottest parts of the year and time of day...also need to be built with sustainable materials and designed to be energy efficient.”
- “I love the parks and open space. All of the retail activity should be at the street level to create vibrancy and make the City come alive through its natural amenities.”

***What improvements are needed at and
around stations to make getting to and
from stations safe and convenient?***

- “Parking. There will need to be ample parking, and it must have accommodations for disabled community members. (Easy and convenient ramps, textured ground guides for the blind, lots of seating for the elderly and less mobile, ticket booths that speak so the blind can use them) Please make sure these accommodations are not afterthoughts...”
- “Pedestrian and cycling infrastructure **must** be present. As a full-time pedestrian and cyclist for more than 12 years, I know that most of these station locations are terrible and stressful for pedestrians...so investing in fully protected bicycle lanes and wide sidewalks are essential...”

What features do you envision when imagining your experience at a station (when accessing the station, waiting for the next train and boarding a train)?

- “Nice architecture, shade, benches, trees. Ideally a screen that displays when trains will arrive, rather than annoying announcements on the loudspeaker...”
- “I would like the ability to park a food truck, have a kiosk or micro business at the station. Allow busking for local musicians or artists at stations. Include vending machines and Wifi...”

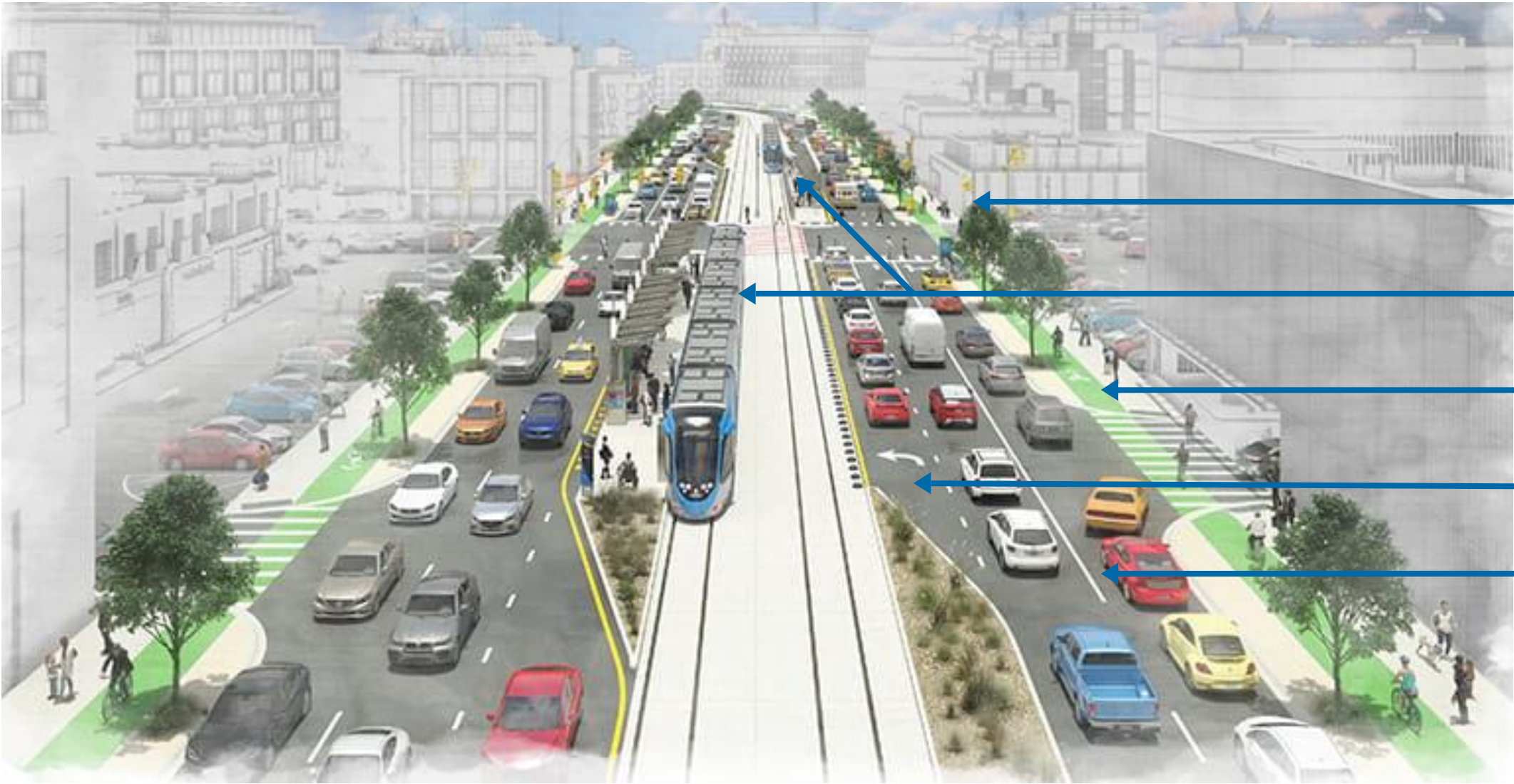
Please share any additional comments or questions you have.

- “Various mockups have been shown of the airport station T'ing into the terminal. However, designing the station so that it runs alongside the terminal would better accommodate potential/future extensions of the Blue line further east.”
- “It’s important to ensure that bus timetables align with train timetables to make connections efficient. I’m hoping that the speed of these trains actually makes it feasible to travel from south to north Austin...”
- “For far too long, American transit has been built at minimum cost. We need to fully invest in this system and go the extra mile...”

Upcoming Engagement Activities

- **Next round of Community Conversations (Orange & Blue Lines 15% Design) July 26-31**
 - Six virtual meetings
 - One in-person open house meeting
 - Self-guided virtual open house meeting July 26 through August
- **Community Advisory Committee meeting:**
 - June 30
- **Project Connect Ambassador Network Meetings:**
 - June 23
 - July 22

Reimagining the Right of Way – Complete Streets



Example
Right of Way
Elements

Tree Canop

Station
Platforms

Bike Paths

Turn Lane

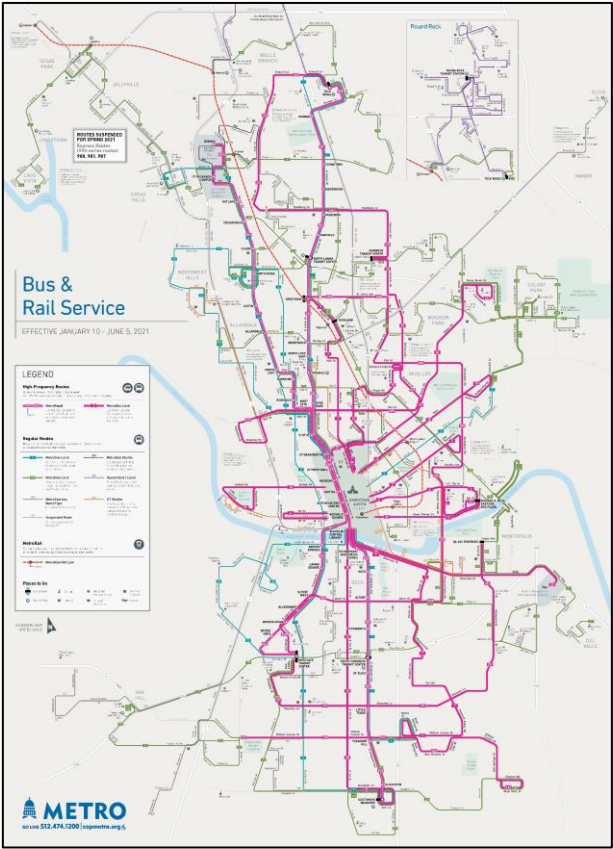
Travel Lane

Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

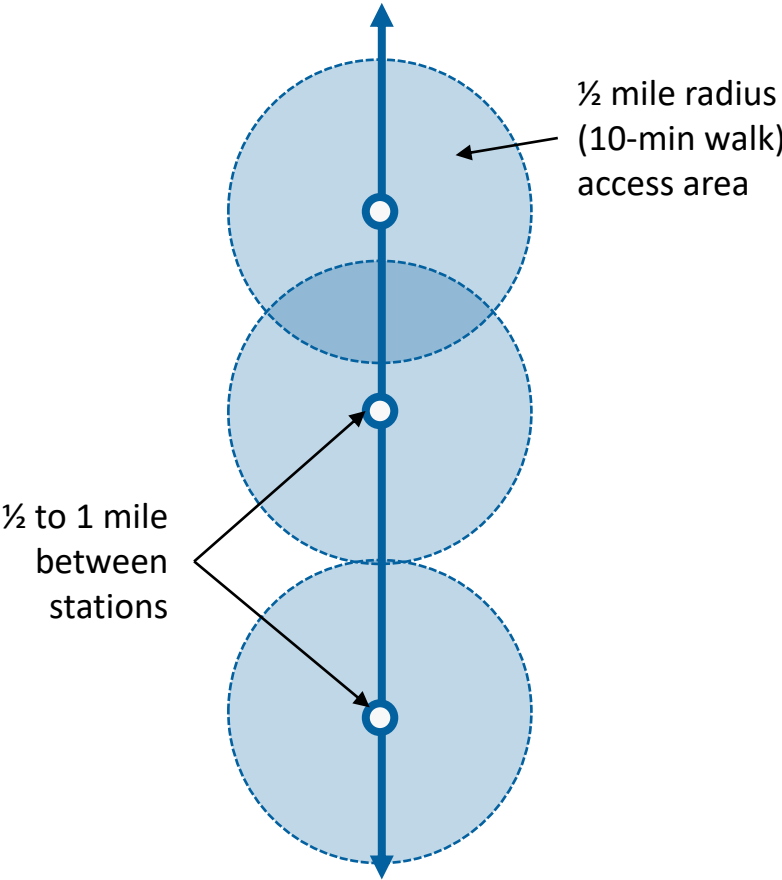
Station Location Principles

5.5.a
* Reviewed at April virtual community meetings

Maximize connectivity to transit network



Balance speed and access with station spacing



Serve high-activity corridor destinations

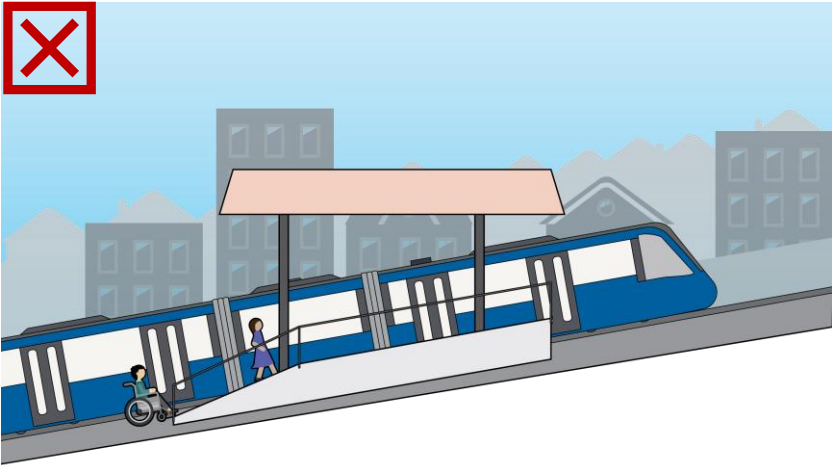


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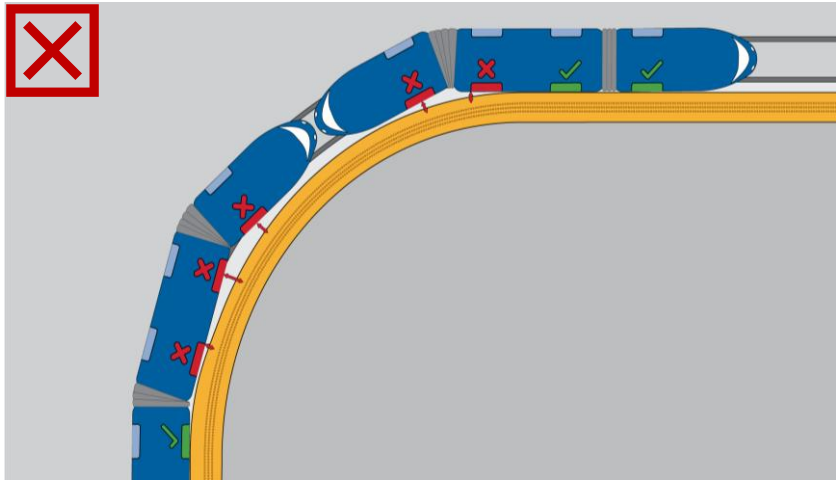
Station Geometry

* Reviewed at April virtual community meetings 5.5.a

Station on an incline



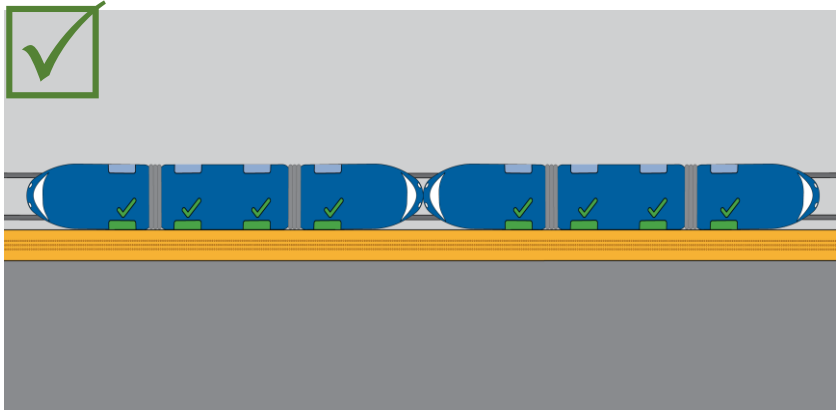
Station on a curve



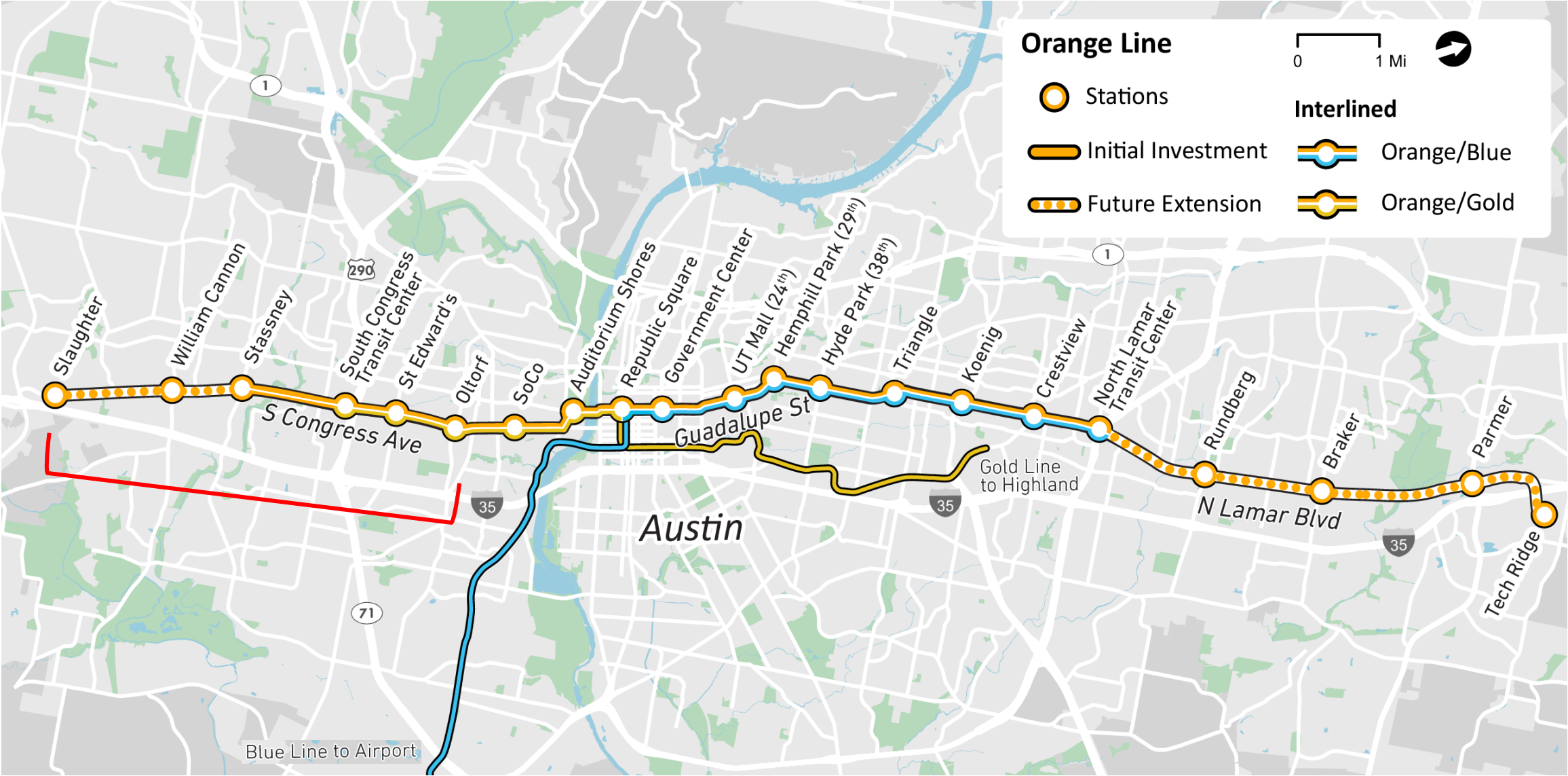
Station on flat land



Station on a straight line

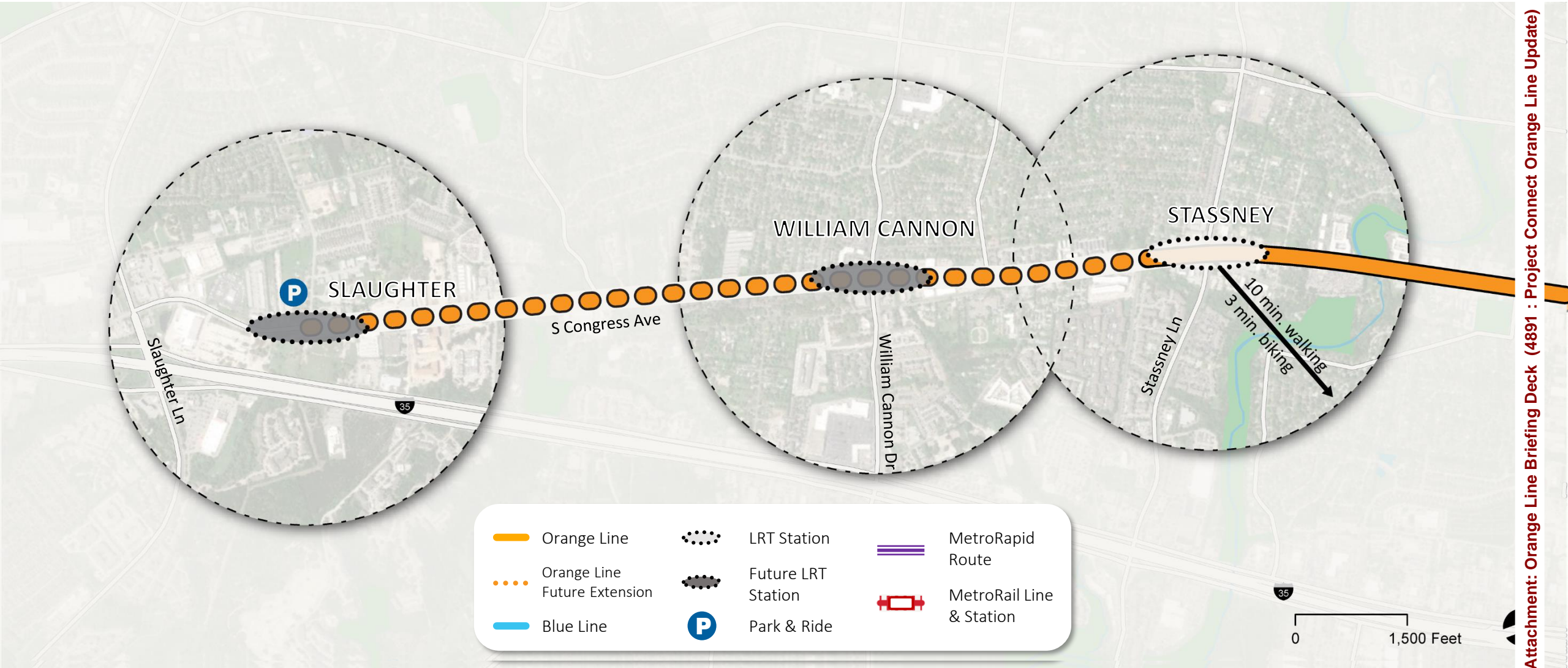


Orange Line Stations - South



Orange Line – Slaughter to Stassney

Note: Station locations and names subject to change



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line Extensions - South

5.5.a

- Initial Investment Begins / Ends at Stassney.
- Future Extension would continue to Slaughter Lane.
- Until the future extension is complete, the Orange Line Extensions will be served by enhanced MetroRapid.
- Current federal review process (NEPA) includes the Orange Line Extensions to expedite design and implementation once funding is secured.



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Slaughter Transit Center

*Station locations and names subject to change
*Station proposed to be off-alignment with parking

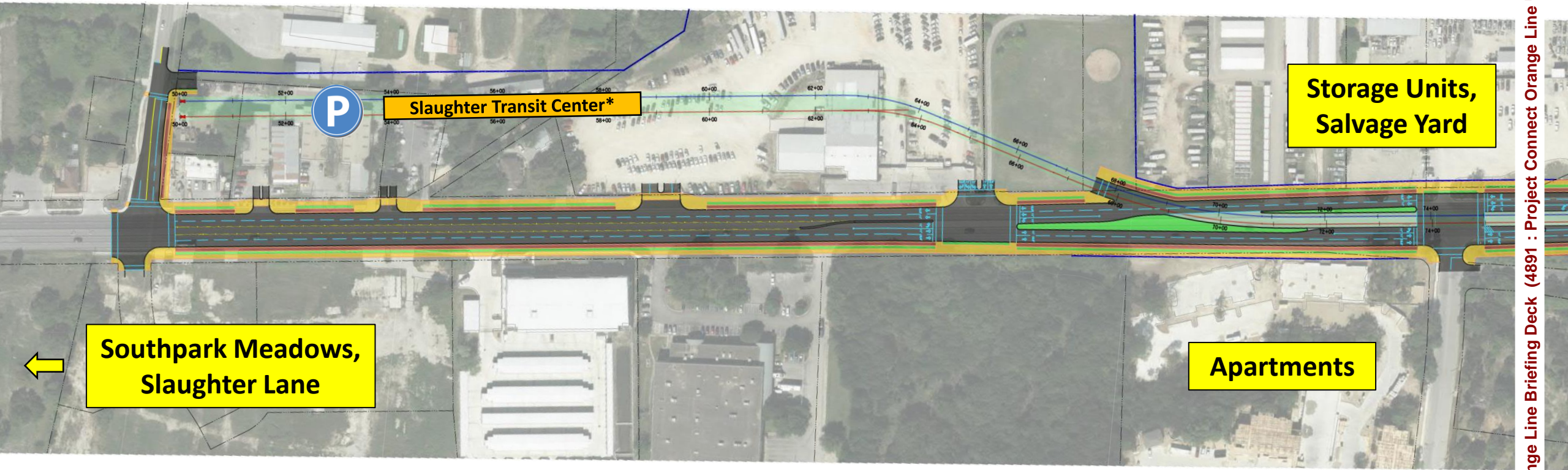
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

South Congress at Ditmar Road

*Station locations and names subject to change

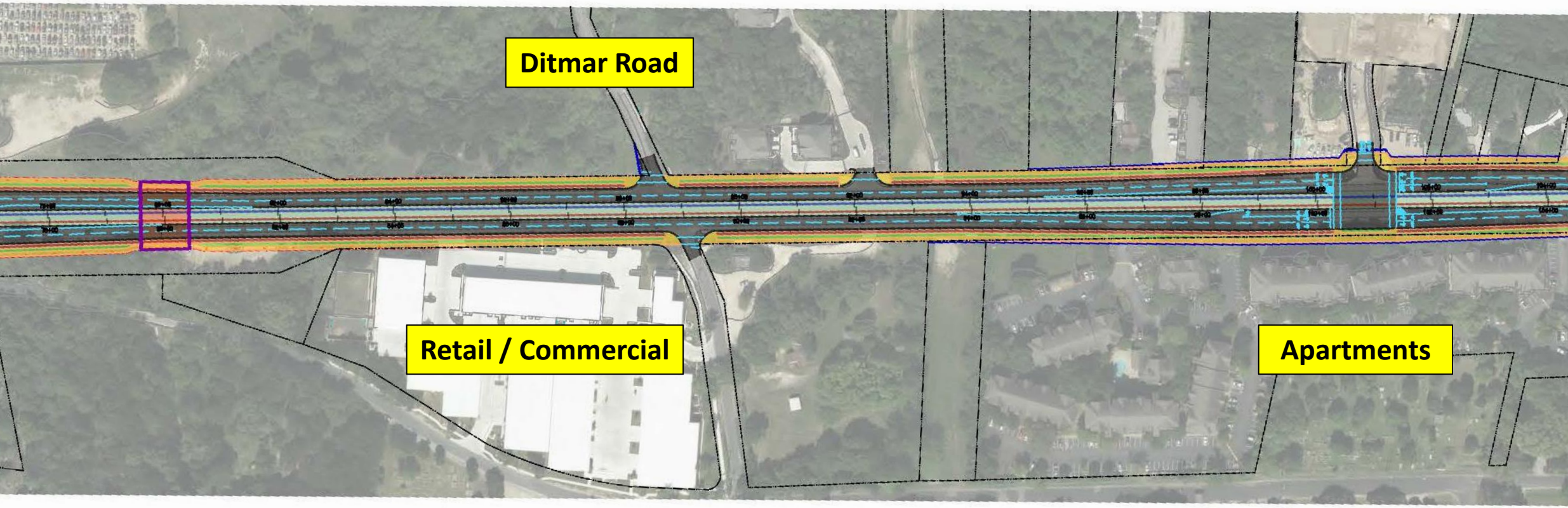
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

South Congress at William Cannon Station

*Station locations and names subject to change

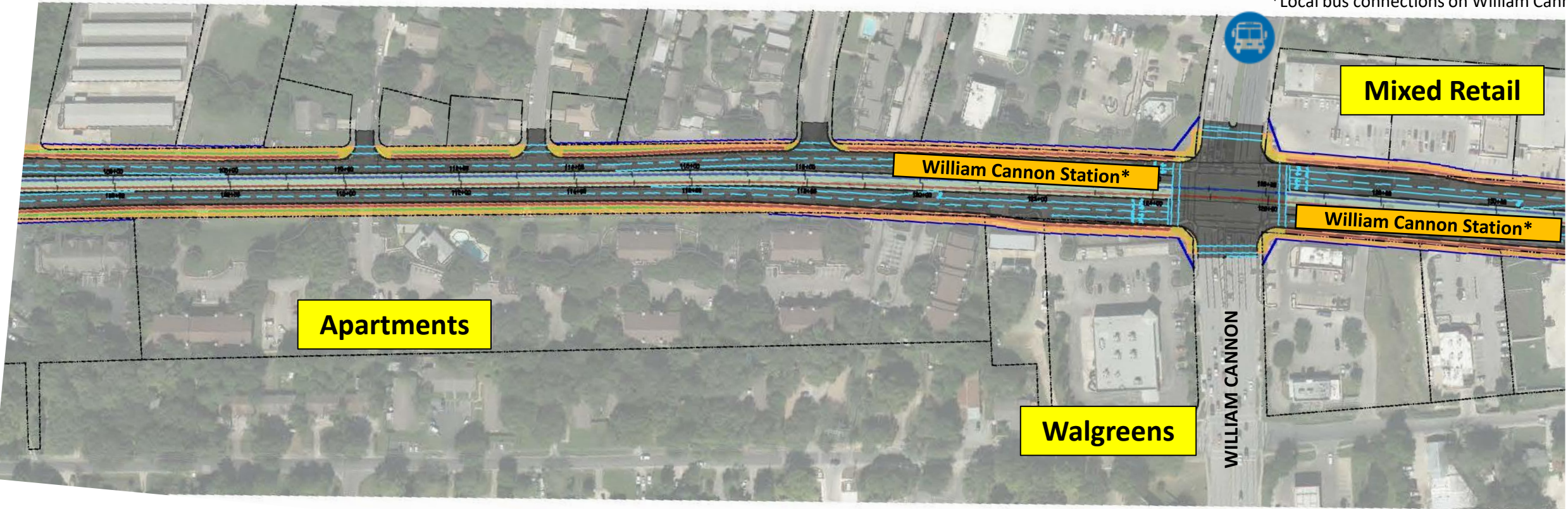
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



*Local bus connections on William Cannon



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

South Congress to Little Texas Lane

*Station locations and names subject to change

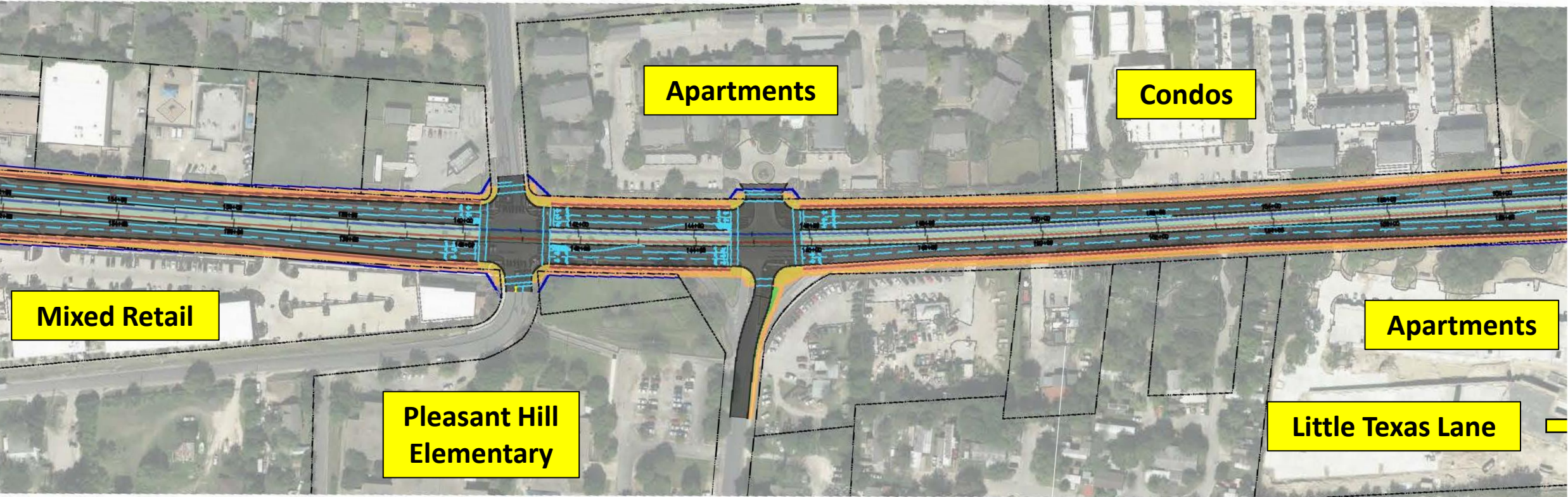
Tree Zone / Median

Bikeway

Roadway

Sidewalk

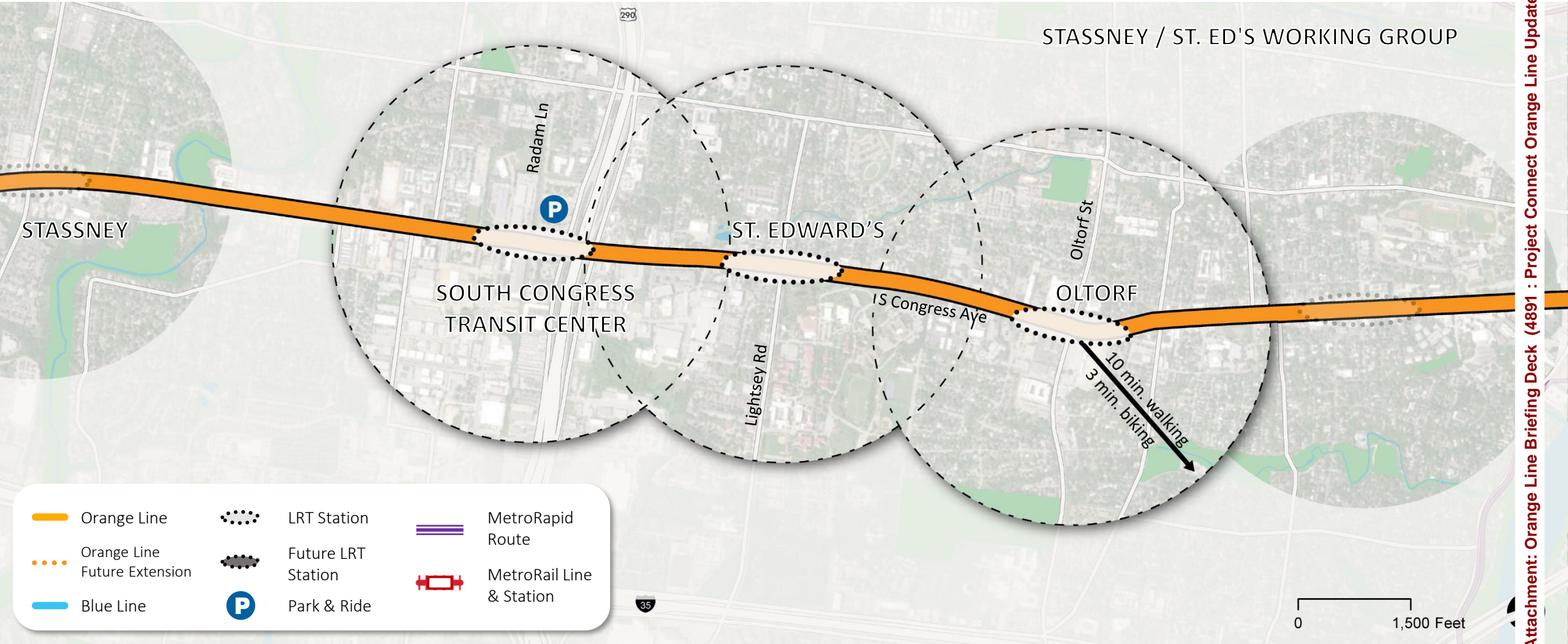
5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line – Stassney to Oltorf

Note: Station locations and names subject to change



South Congress at Stassney Station

*Station locations and names subject to change

Elevated Track

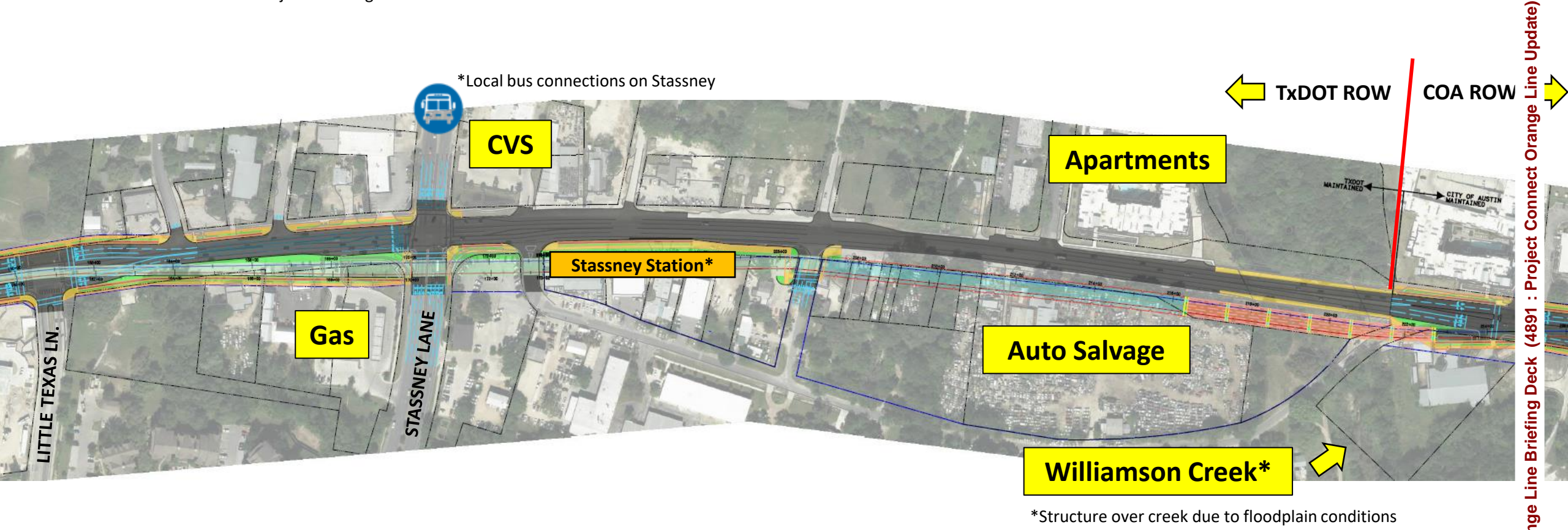
Tree Zone / Median

Roadway

Bikeway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Stassney to South Congress Transit Center

*Station locations and names subject to change

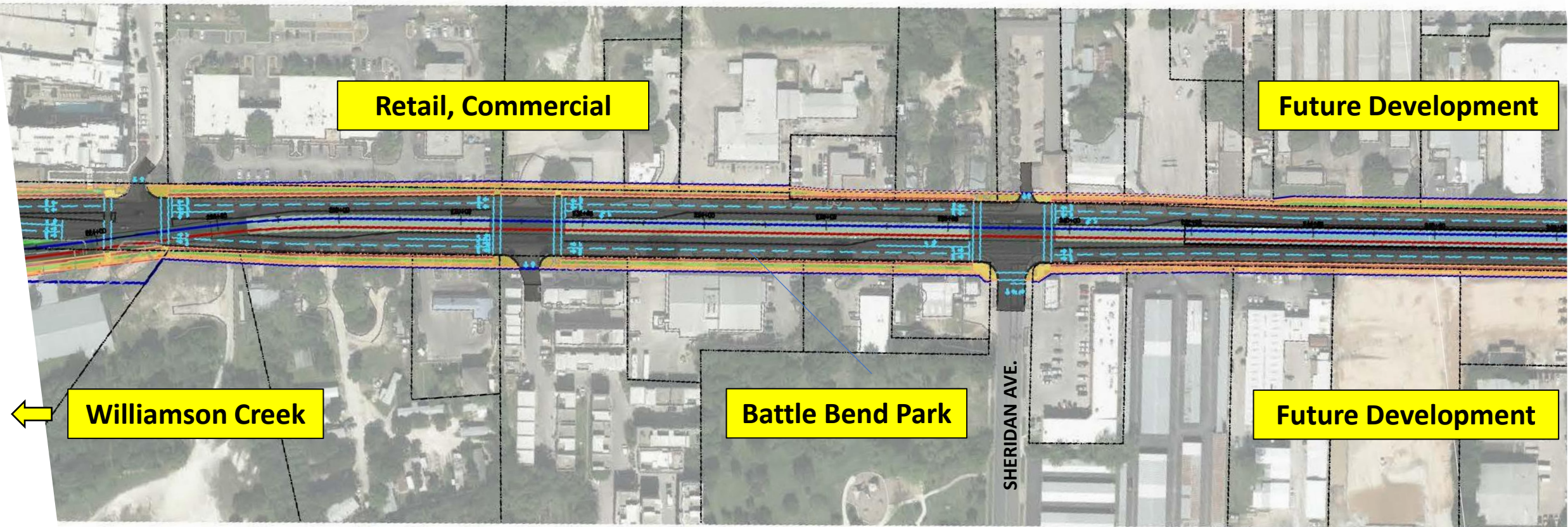
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



South Congress Transit Center

*Station locations and names subject to change

Elevated Track

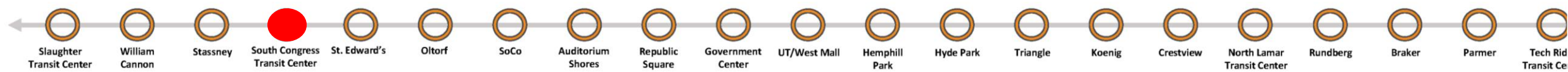
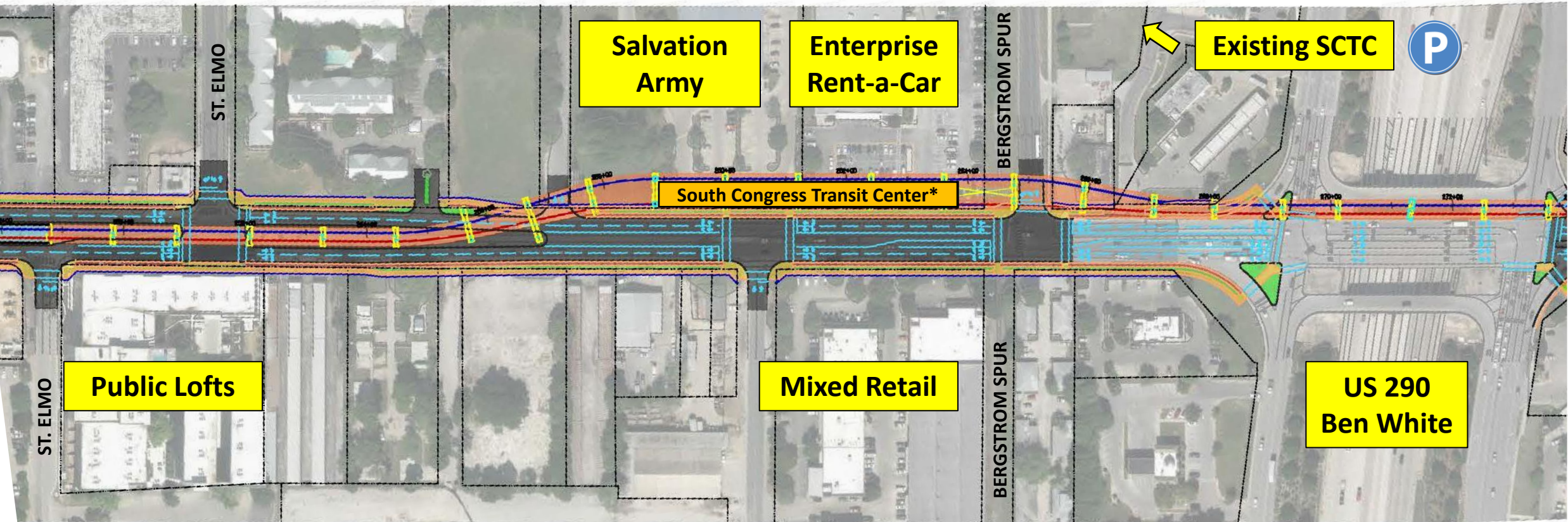
Tree Zone / Median

Roadway

Bikeway

Sidewalk

5.5.a

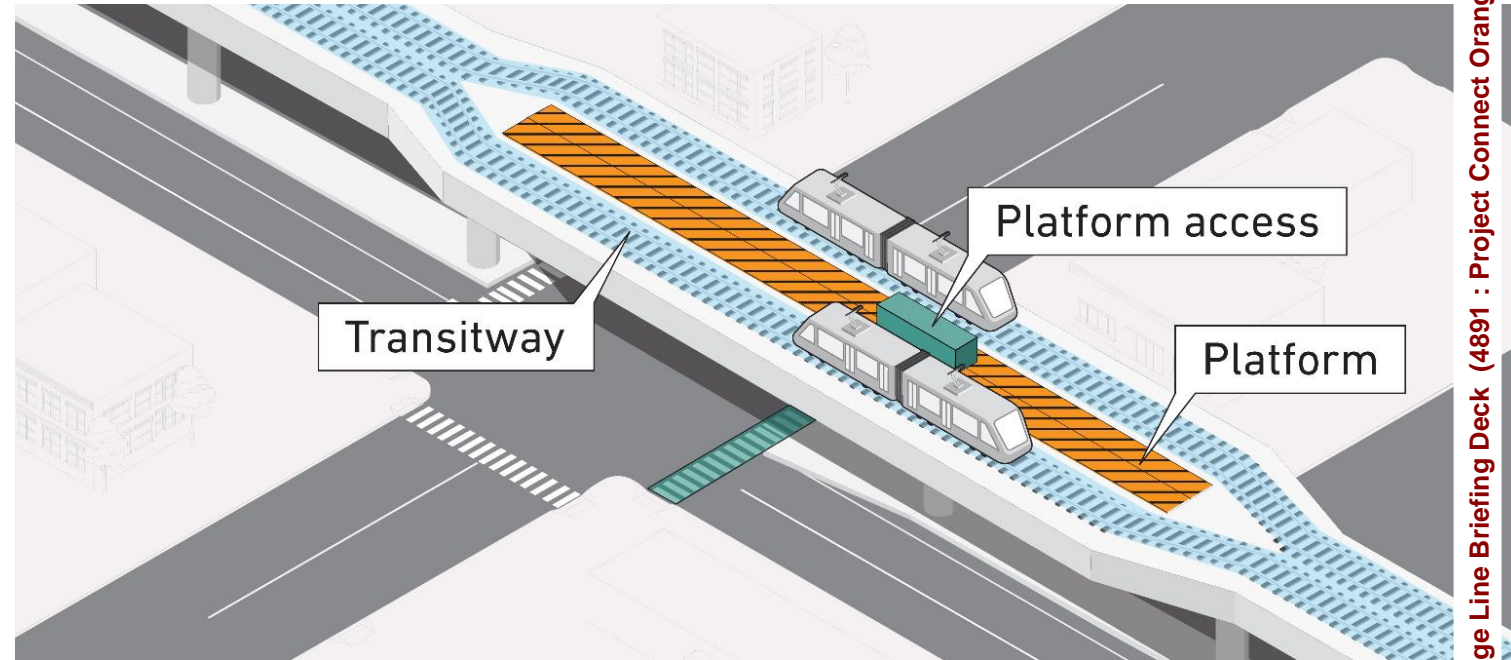


Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Elevated Platform – Typical Layout

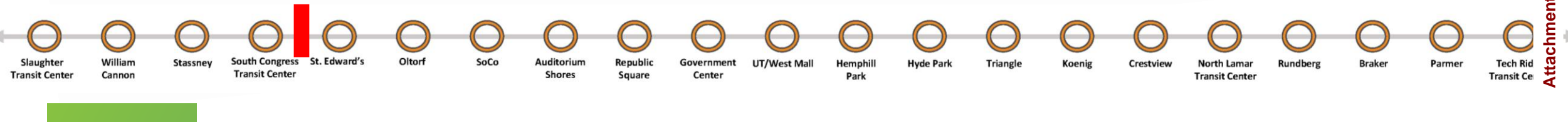
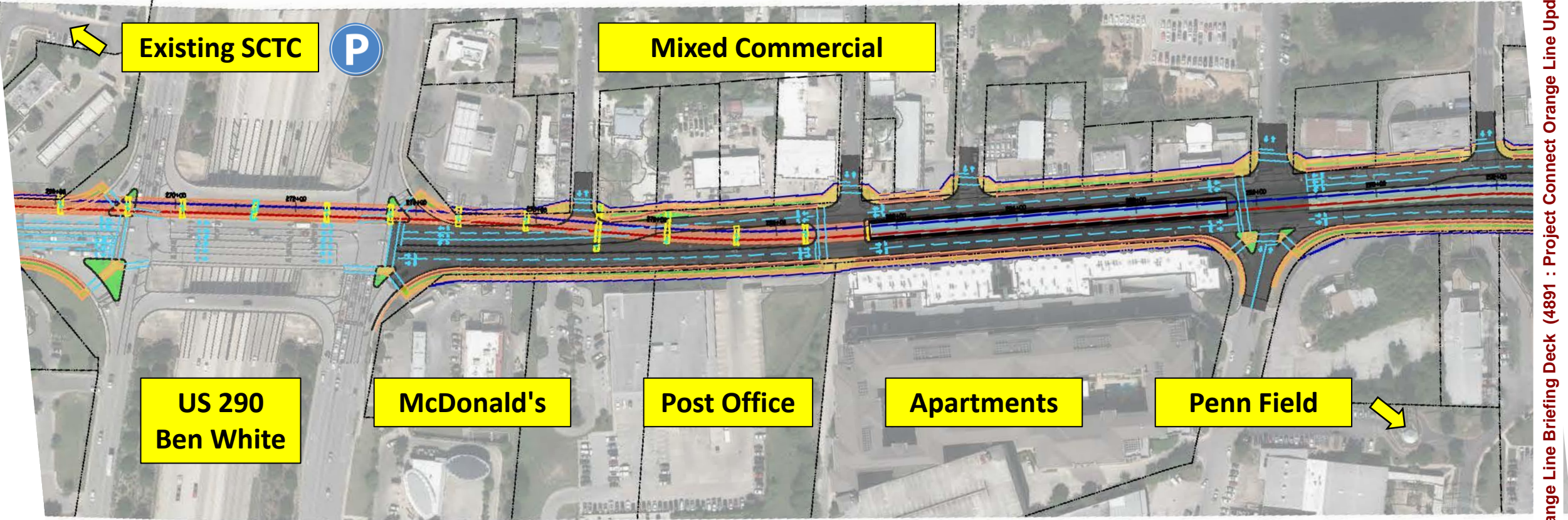
Platforms are elevated above the street and can be placed to the side or in the center of the transitway.

- Passengers access platforms directly from the sidewalk.
- Elevated transitway and stations are used to address engineering or environmental challenges, including:
 - Crossing other major transportation infrastructure



US 290 to Penn Field

*Station locations and names subject to change



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

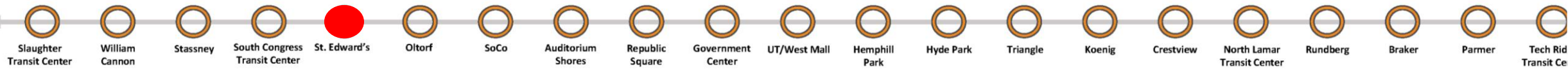
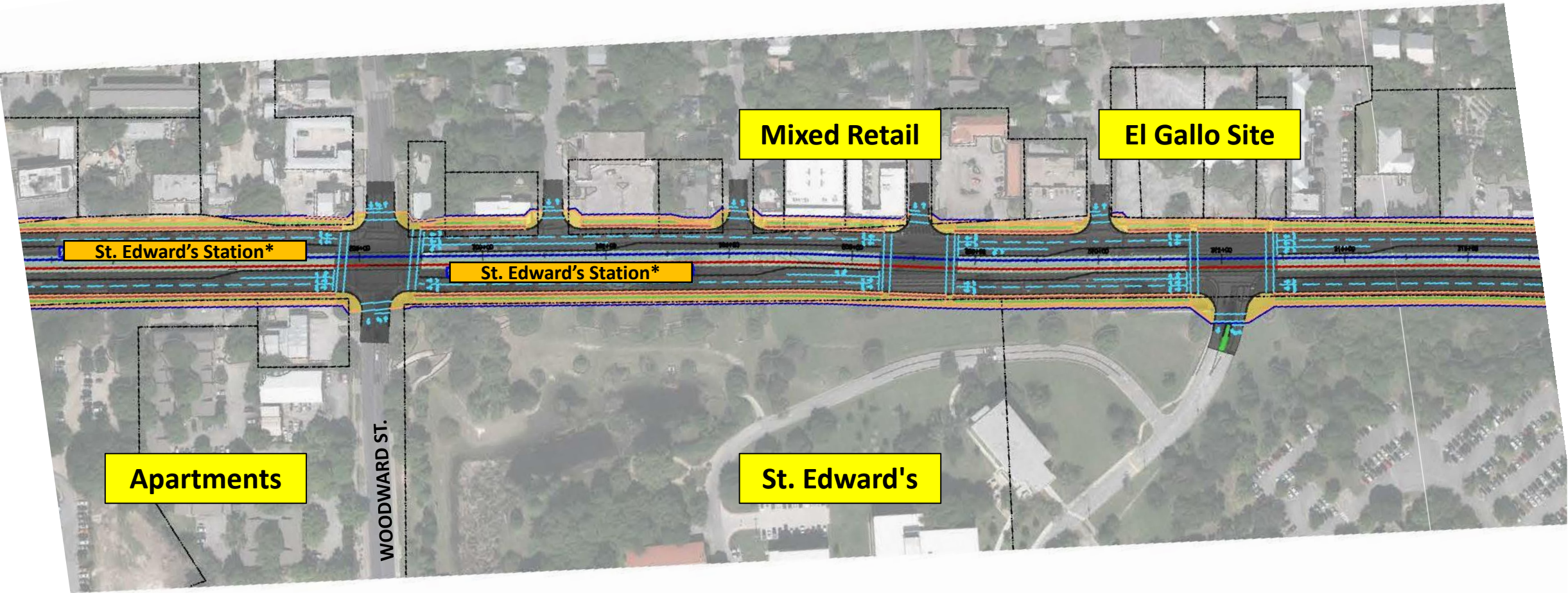
St. Edward's University (Split Platform Option)

*Station locations and names subject to change

- Tree Zone / Median
-
- Roadway

Bikeway

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

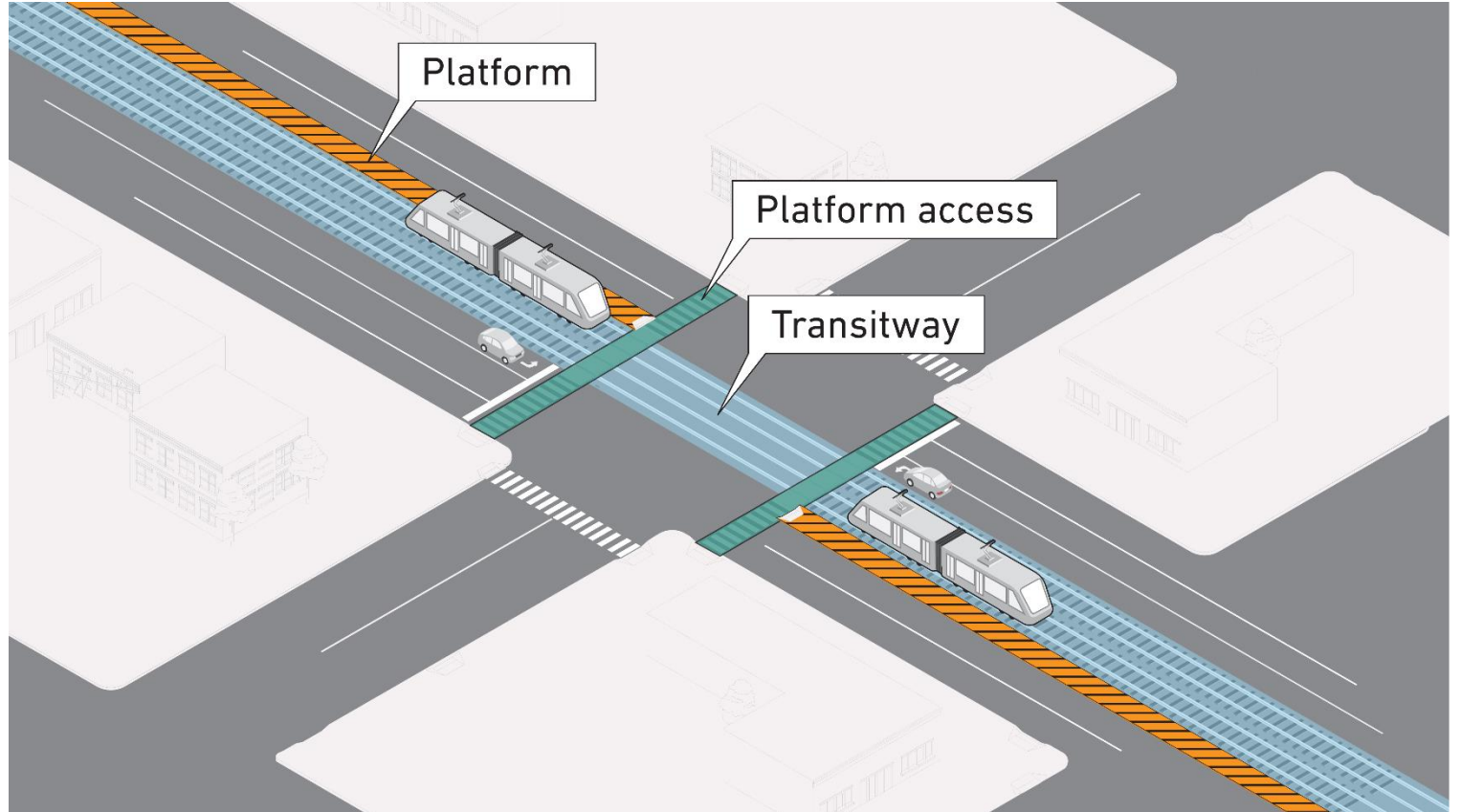
Split Platform Station – Typical Layout

5.5.a



Each direction served by its own platform, usually located on opposite sides of an intersection.

- Platforms are narrower since they only serve one direction.
- Offset platforms can provide more space for left turn lanes.



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

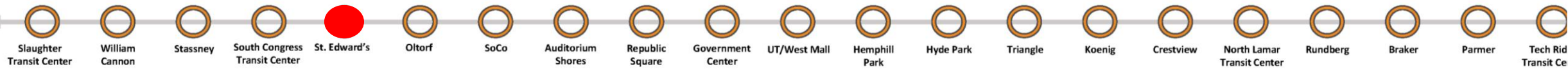
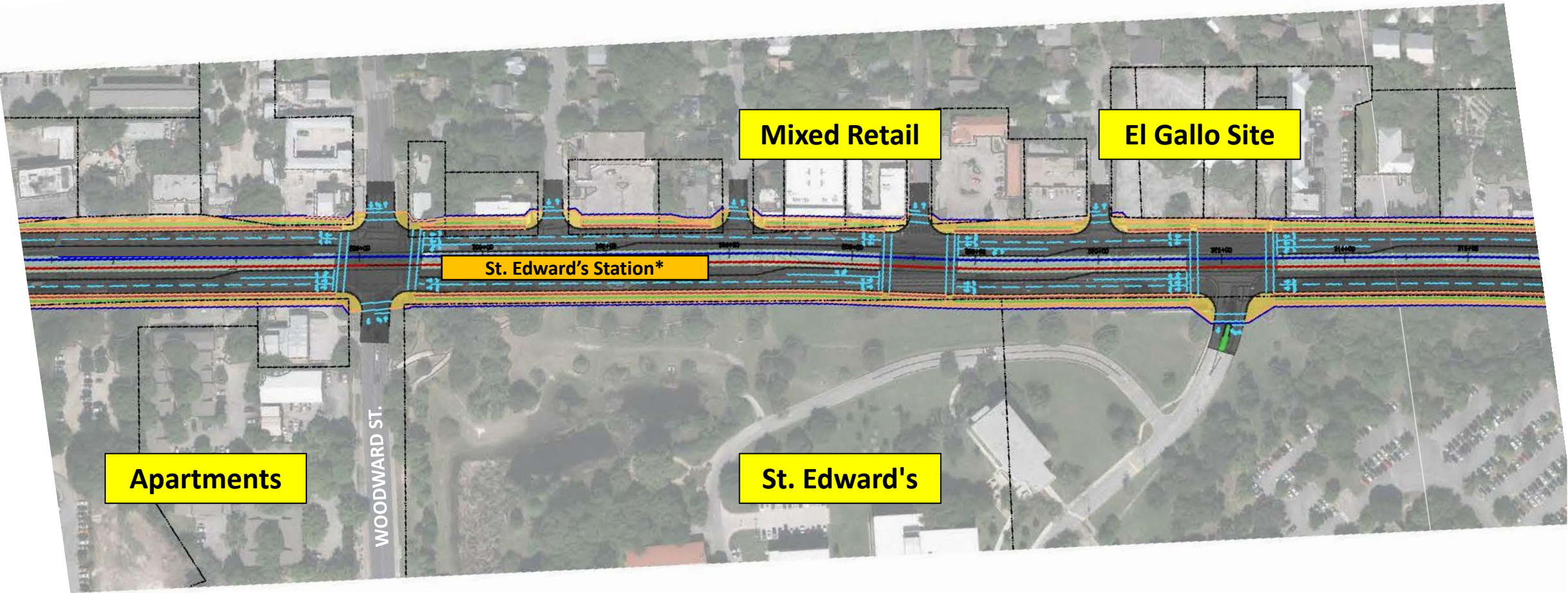
St. Edward's University (Center Platform Option)

*Station locations and names subject to change

- Tree Zone / Median
-
- Roadway

Bikeway

5.5.a

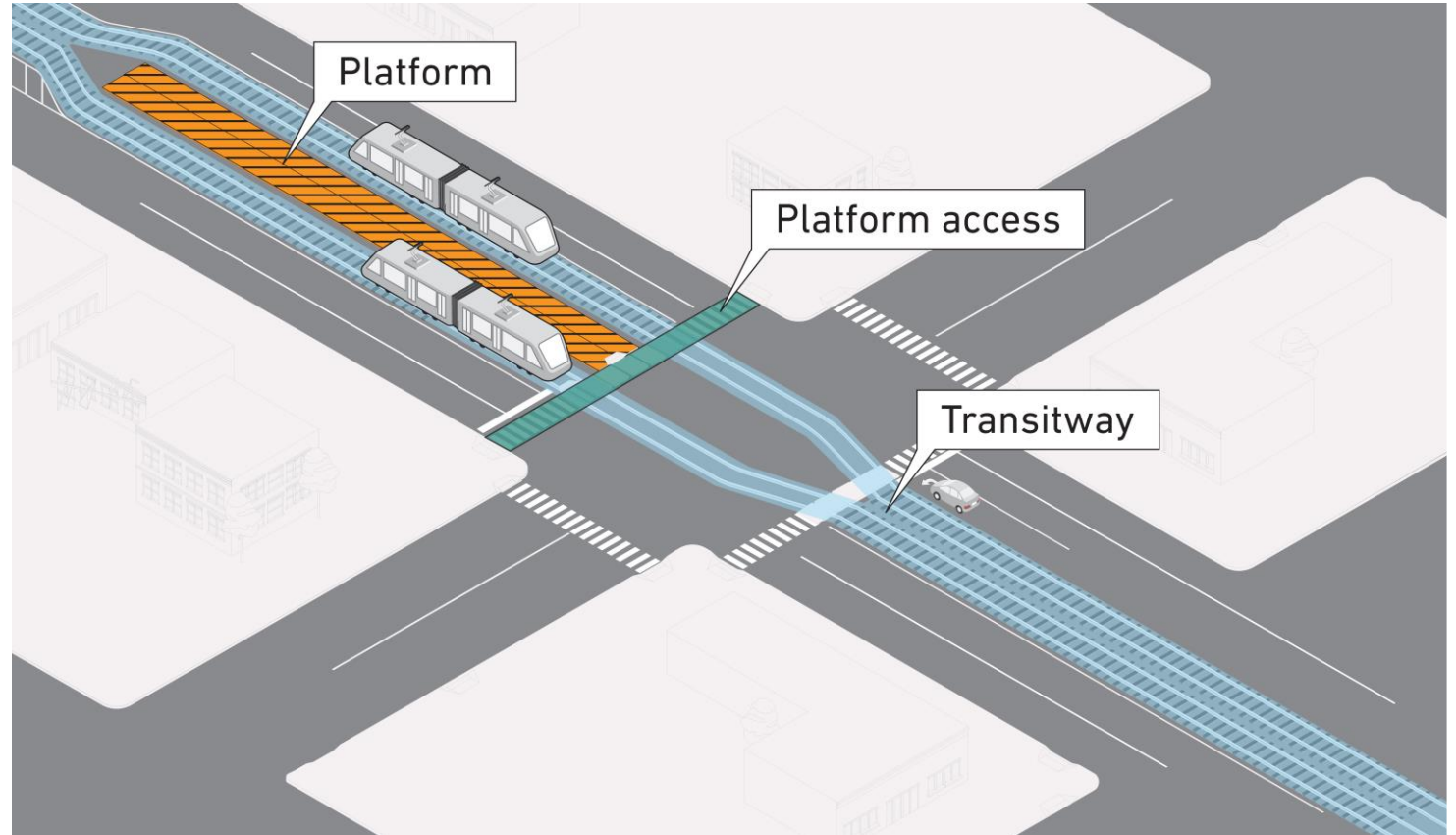


Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Center Platform Station – Typical Layout

5.5.a

- Both directions served by a single platform.
- Platform is typically wider to accommodate passengers loading in both directions.
- Allow facilities to be shared between both tracks
- Offer a more comfortable waiting space for passengers, who are separated from traffic by the tracks
- Cost effective



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

South Congress at Oltorf Station

*Station locations and names subject to change

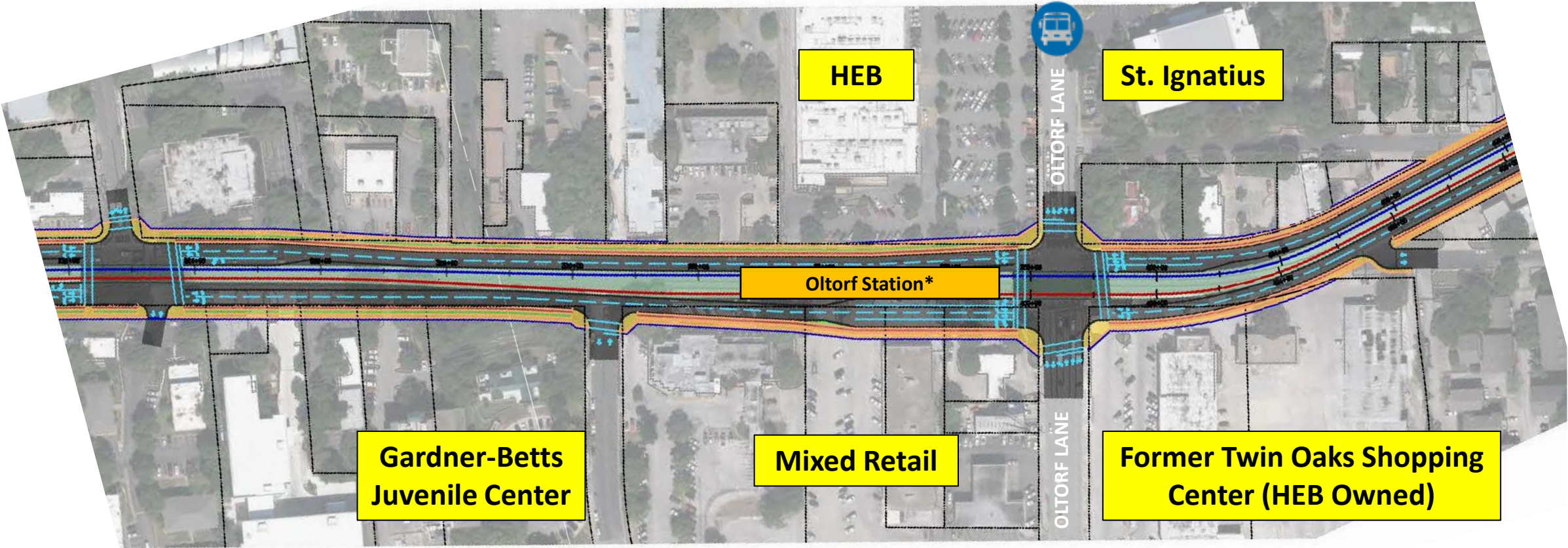
*Local bus connections on Oltorf

- Tree Zone / Median

Bikeway
- Roadway

Sidewalk

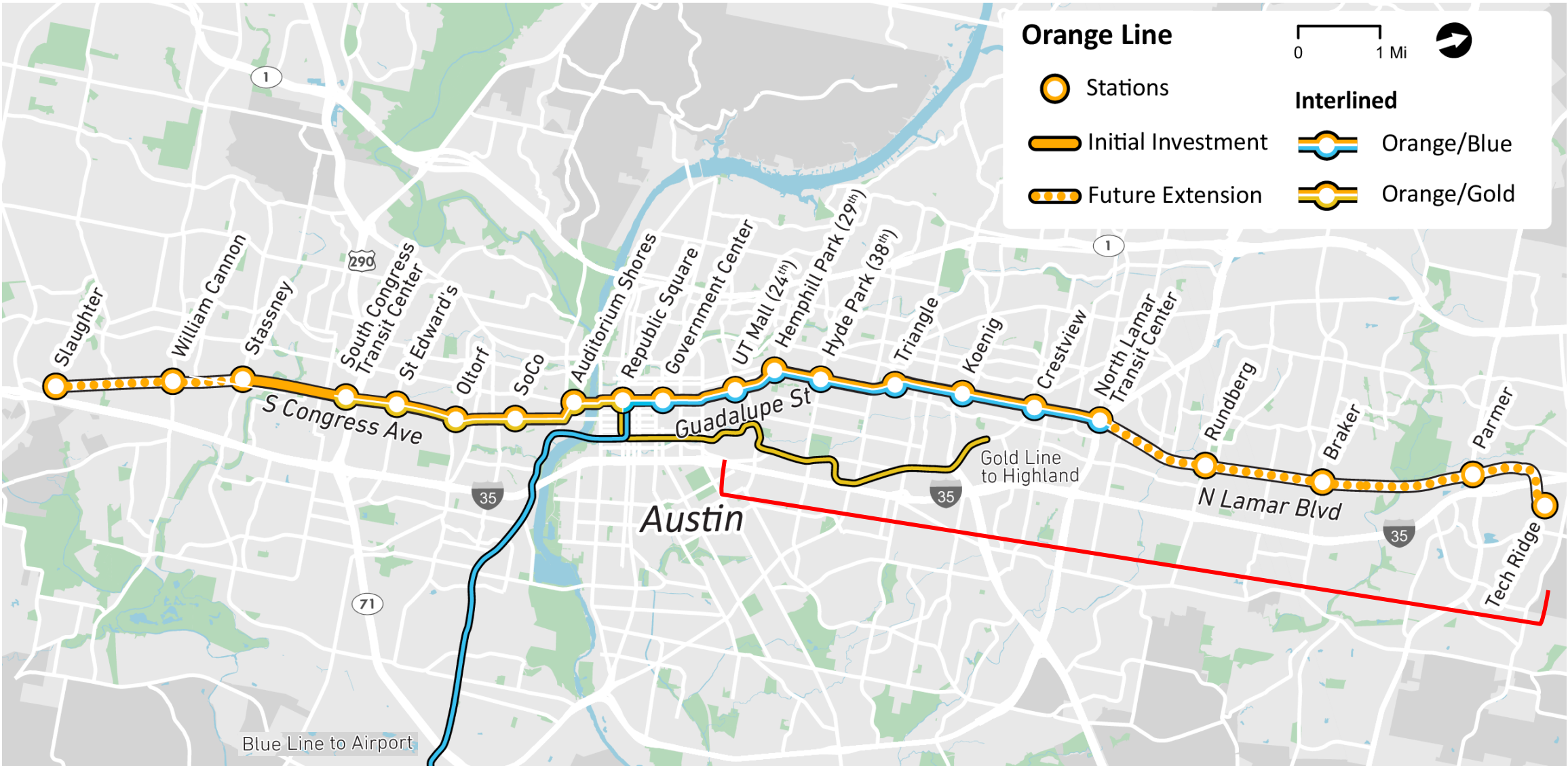
5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line Stations - North

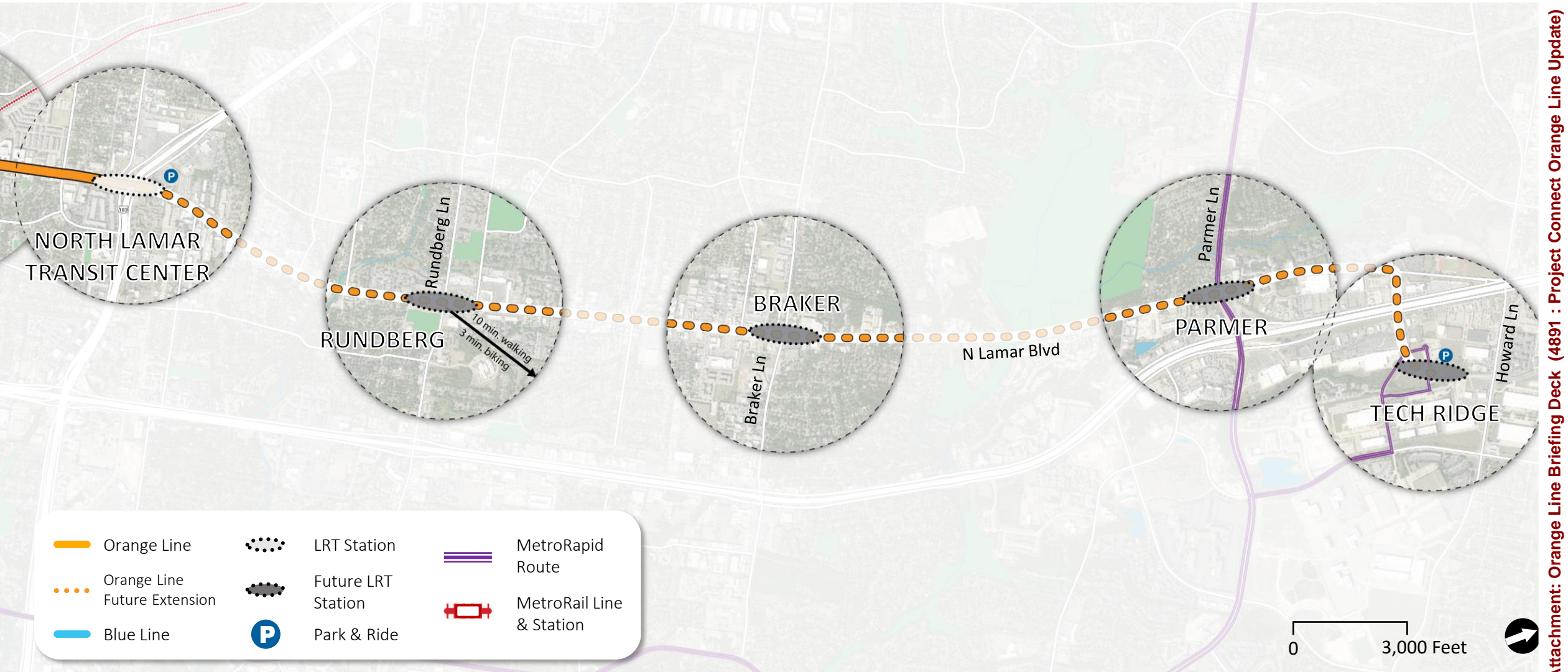
Note: Station locations and names subject to change 5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line – Rundberg to North Lamar Transit Center

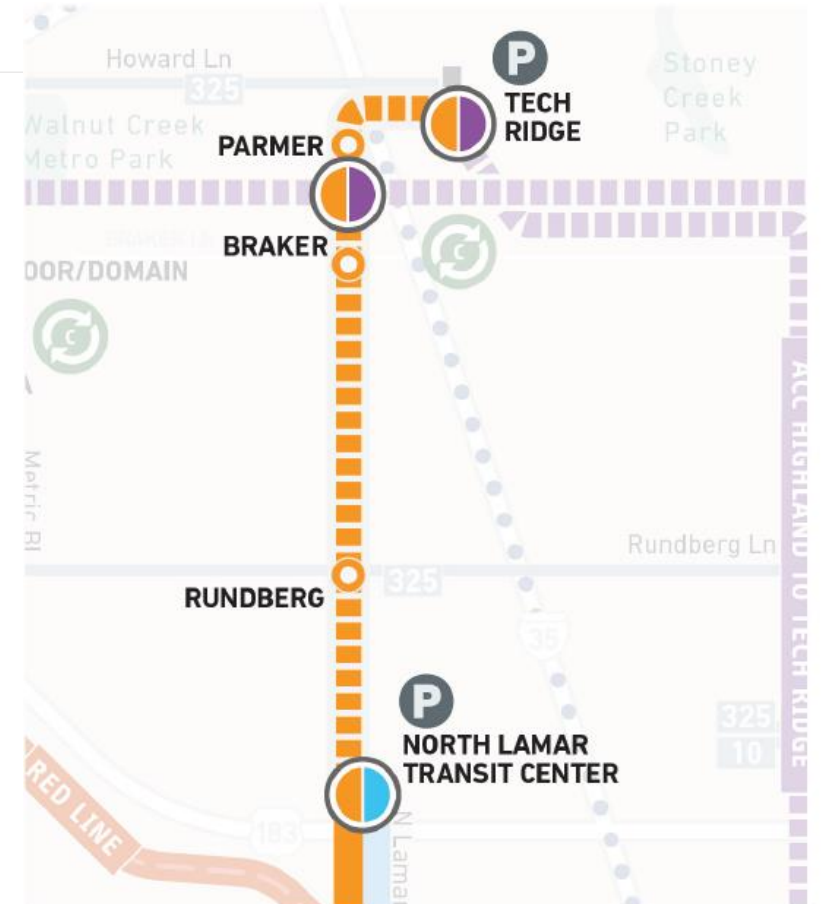
Note: Station locations subject to change 5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line Extensions - North

- Initial Investment Begins / Ends at North Lamar Transit Center.
- Future Extension would continue to Tech Ridge
- Until the future extension is complete, the Orange Line Extensions will be served by enhanced MetroRapid.
- Current federal review process (NEPA) includes the Orange Line Extensions to expedite design and implementation once funding is secured.



5.5.a

Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Tech Ridge Transit Center at I-35

*Station locations and names subject to change

Elevated Track

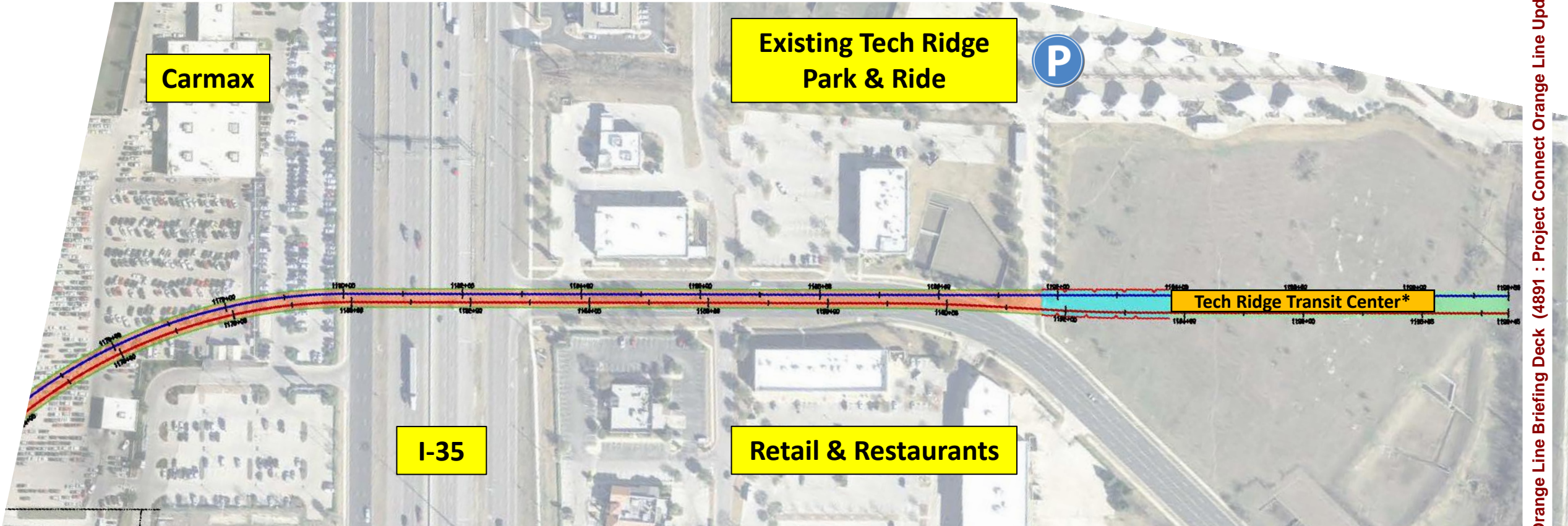
Tree Zone / Median

Roadway

Bikeway

Sidewalk

5.5.a



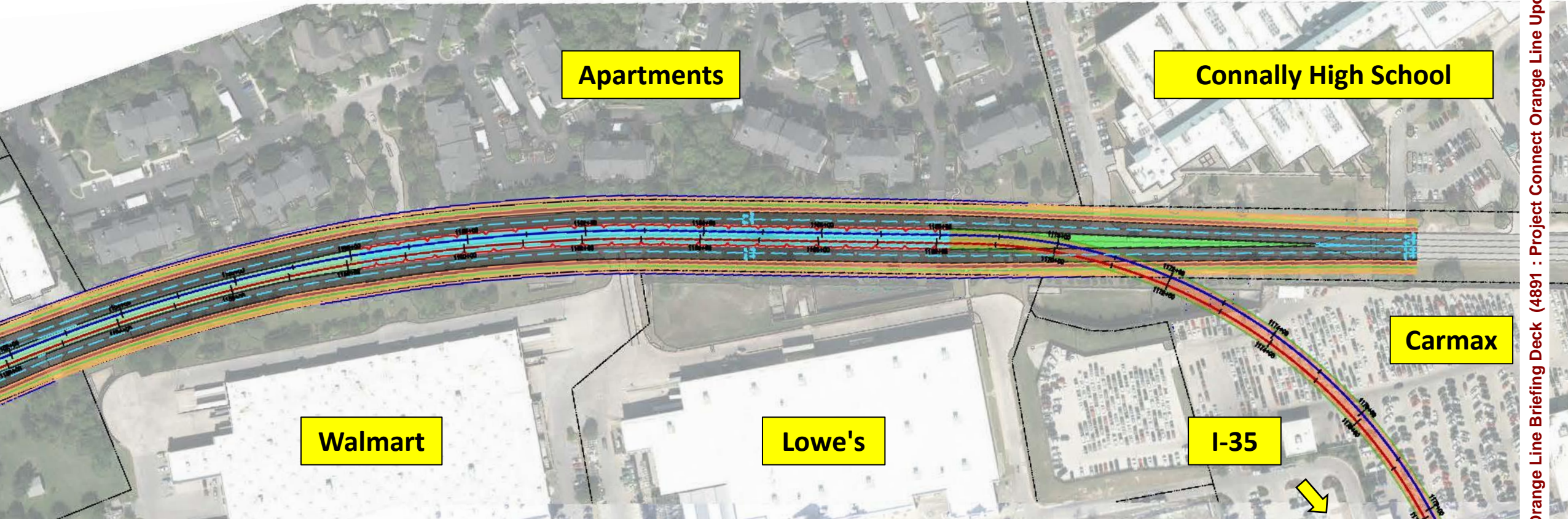
Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

*Station locations and names subject to change

*Station locations and names subject to change

- Roadway
- Sidewalk

5.5.a



Attachment: Orange Line Brieling Deck (4891 : Project Connect Orange Line Update)

North Lamar at Parmer Station

*Station locations and names subject to change

Tree Zone / Median

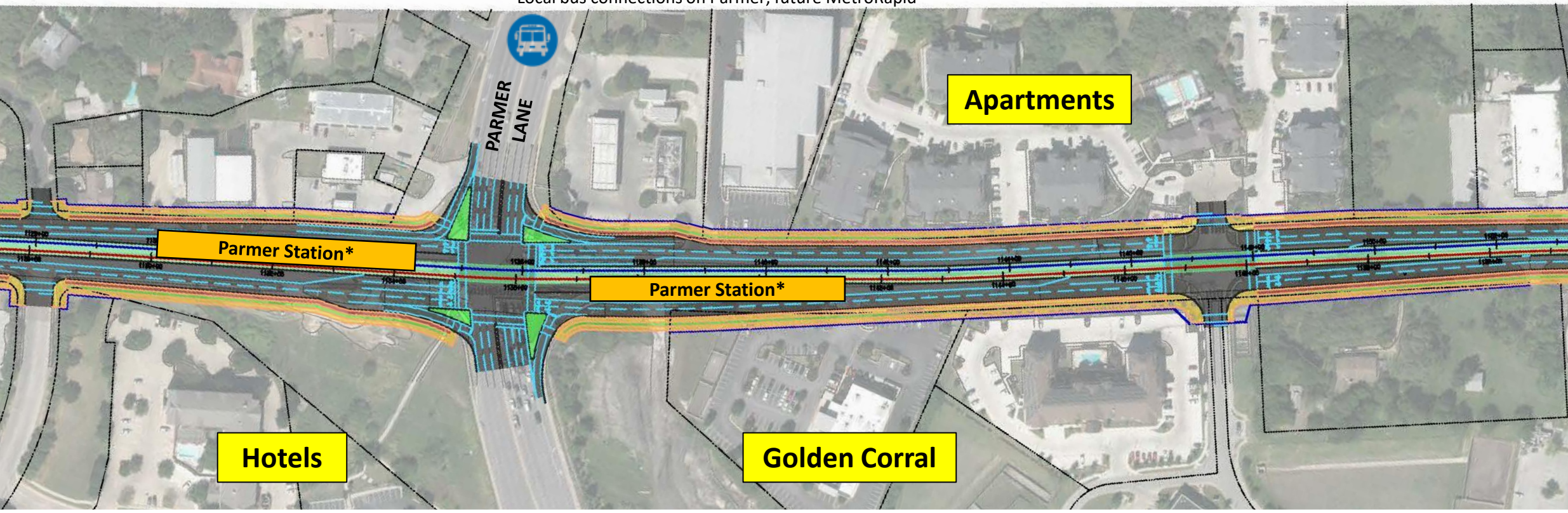
Bikeway

Roadway

Sidewalk

5.5.a

*Local bus connections on Parmer, future MetroRapid



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar at Yager Lane

*Station locations and names subject to change

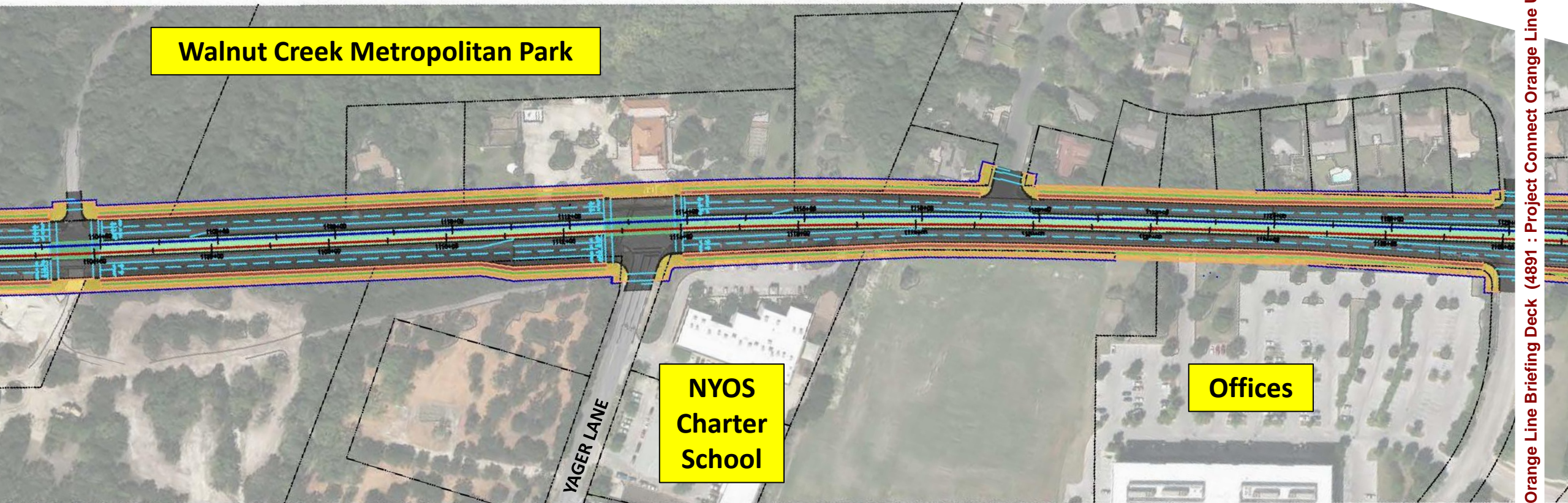
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar at Walnut Creek

*Station locations and names subject to change

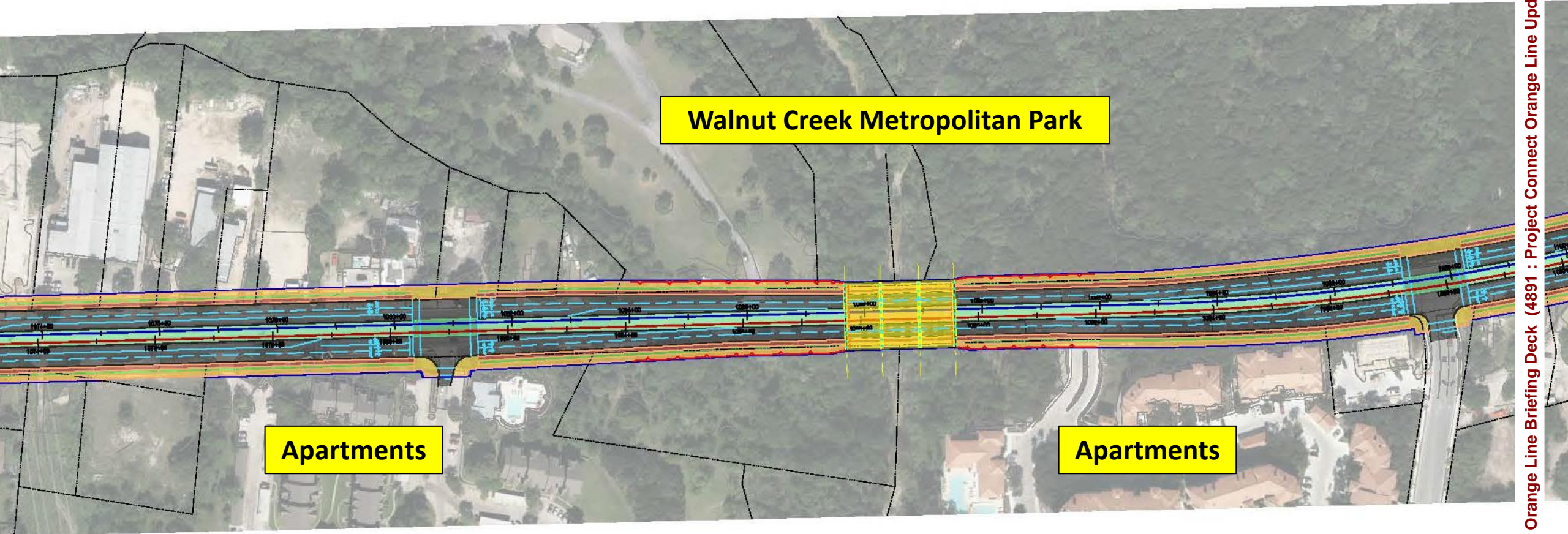
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar at Braker Station

*Station locations and names subject to change

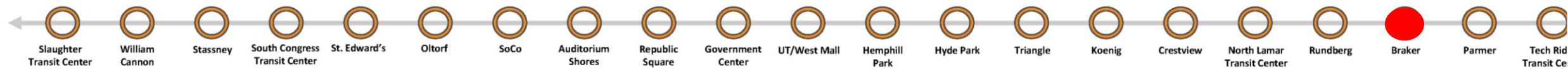
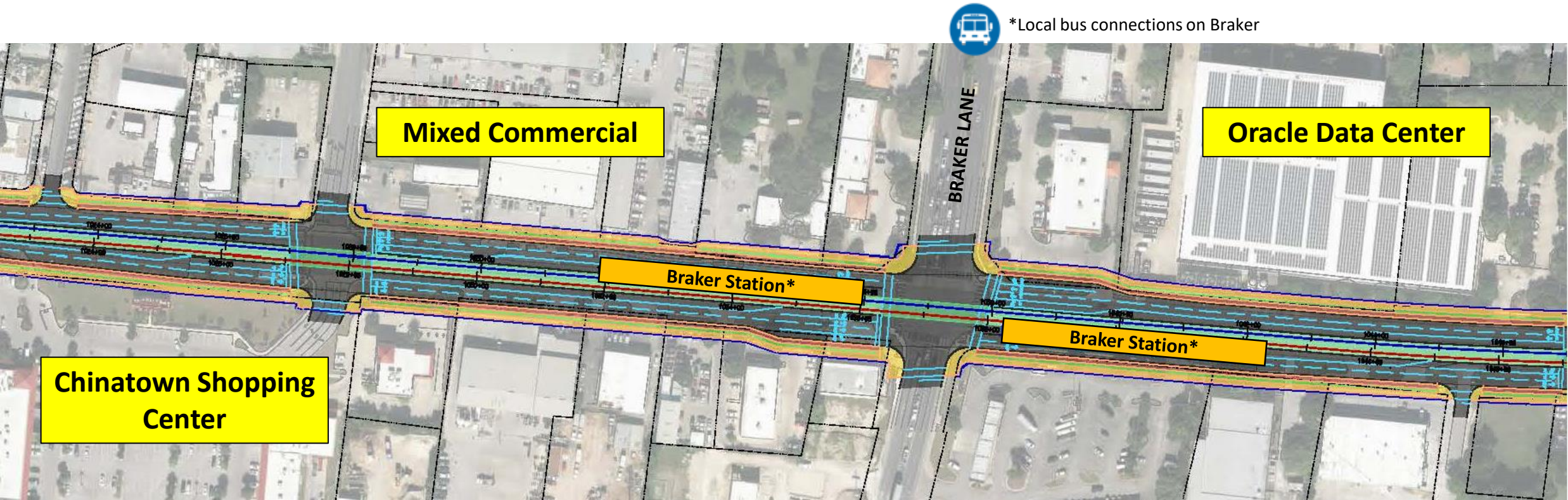
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar - Chinatown to Masterson

*Station locations and names subject to change

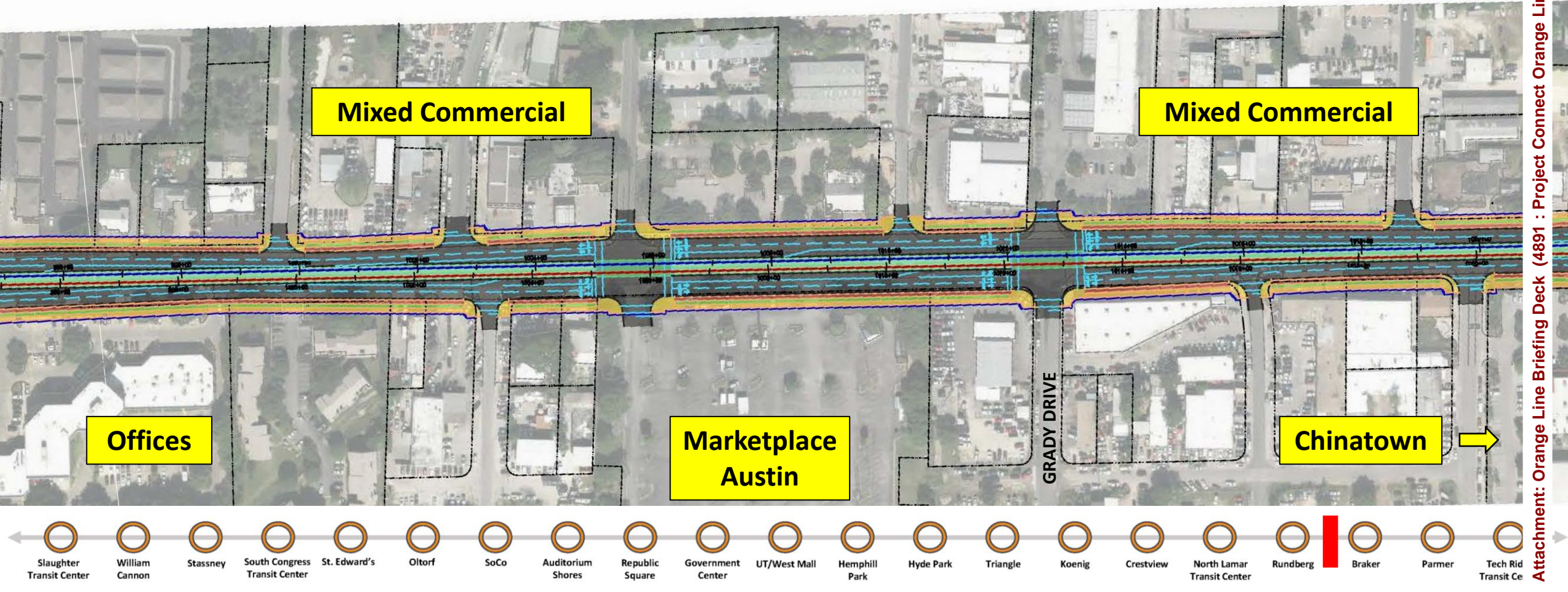
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar at Rutland Drive

*Station locations and names subject to change

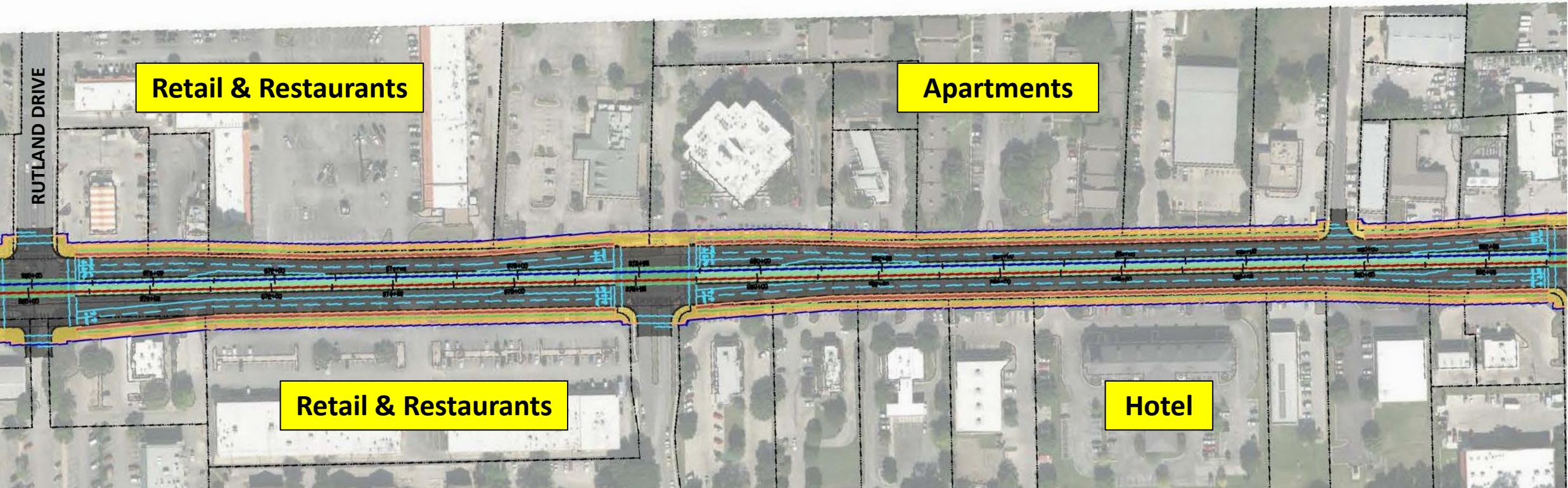
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar at Rundberg Station

*Station locations and names subject to change

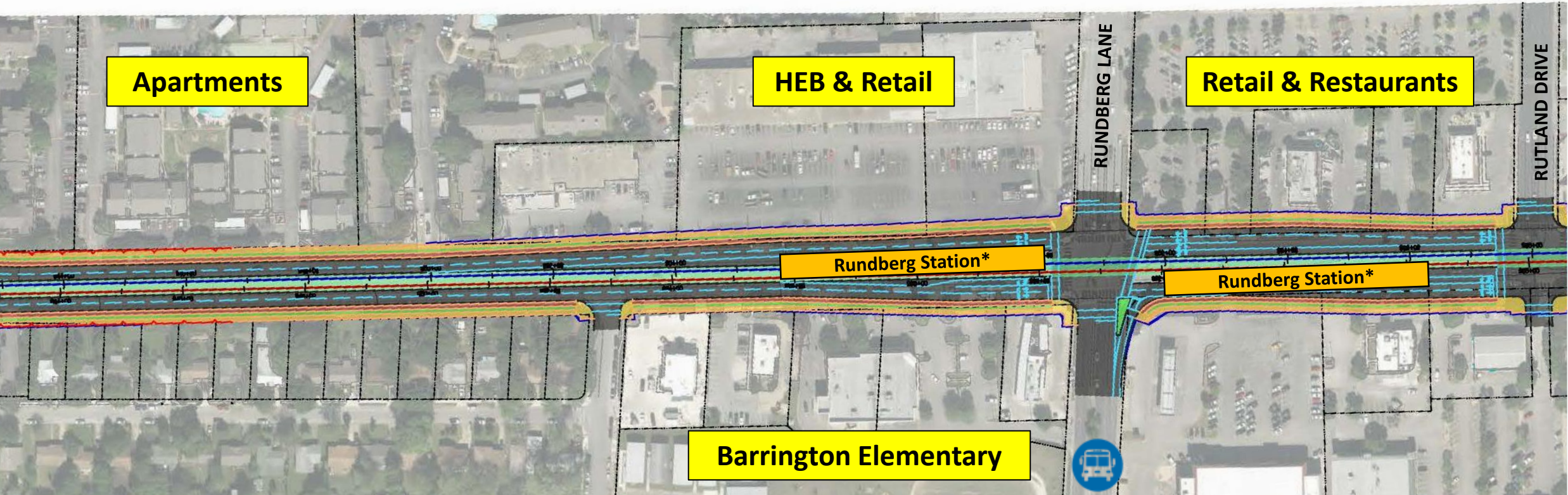
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



*Local bus connections on Rundberg



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar at Little Walnut Creek

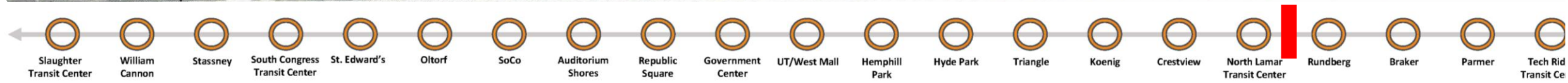
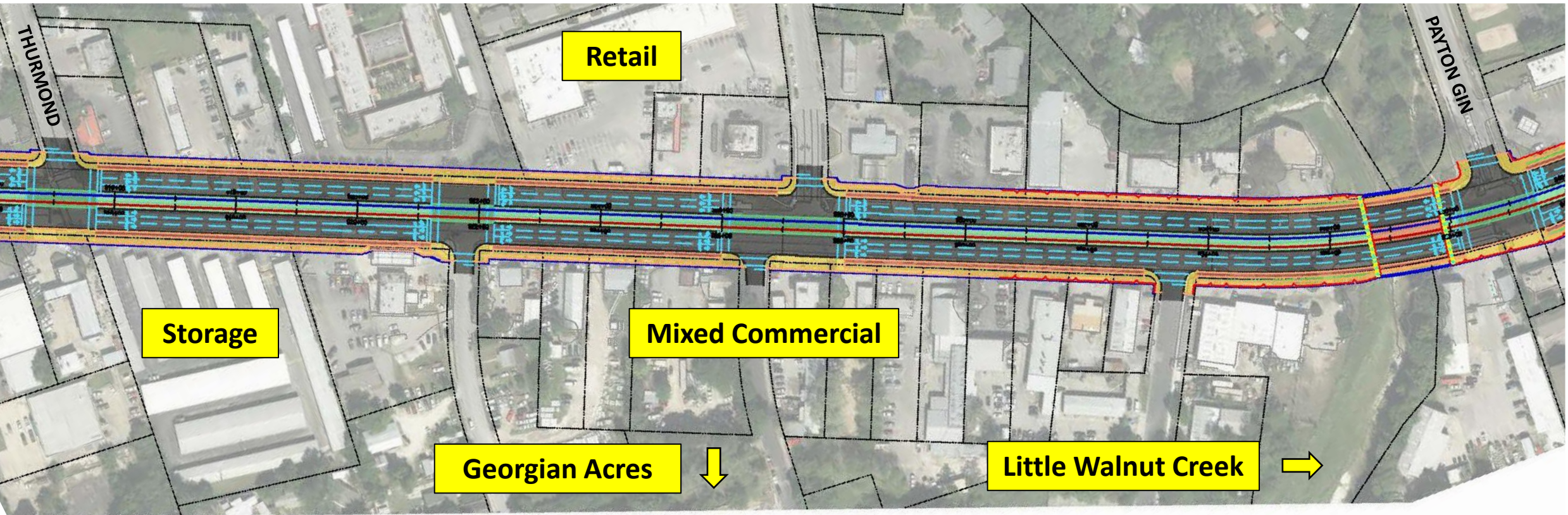
*Station locations and names subject to change

Tree Zone / Median

Bikeway

Roadway 5.5.a

Sidewalk



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar Transit Center

*Station locations and names subject to change

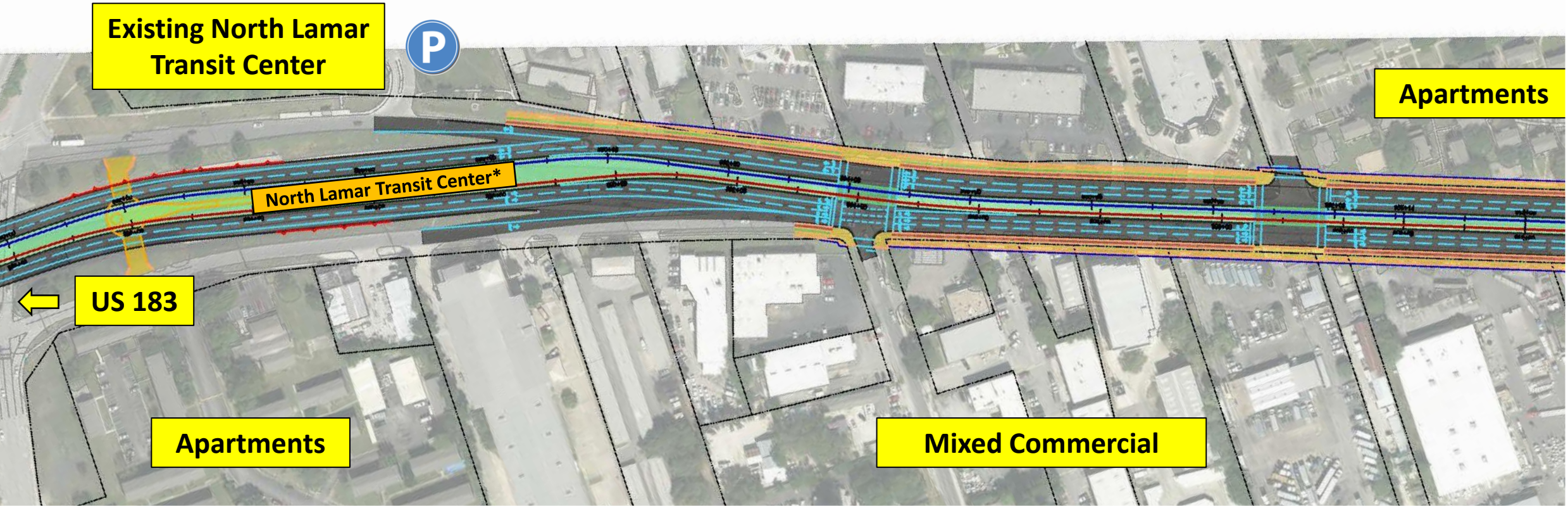
Tree Zone / Median

Bikeway

Roadway

Sidewalk

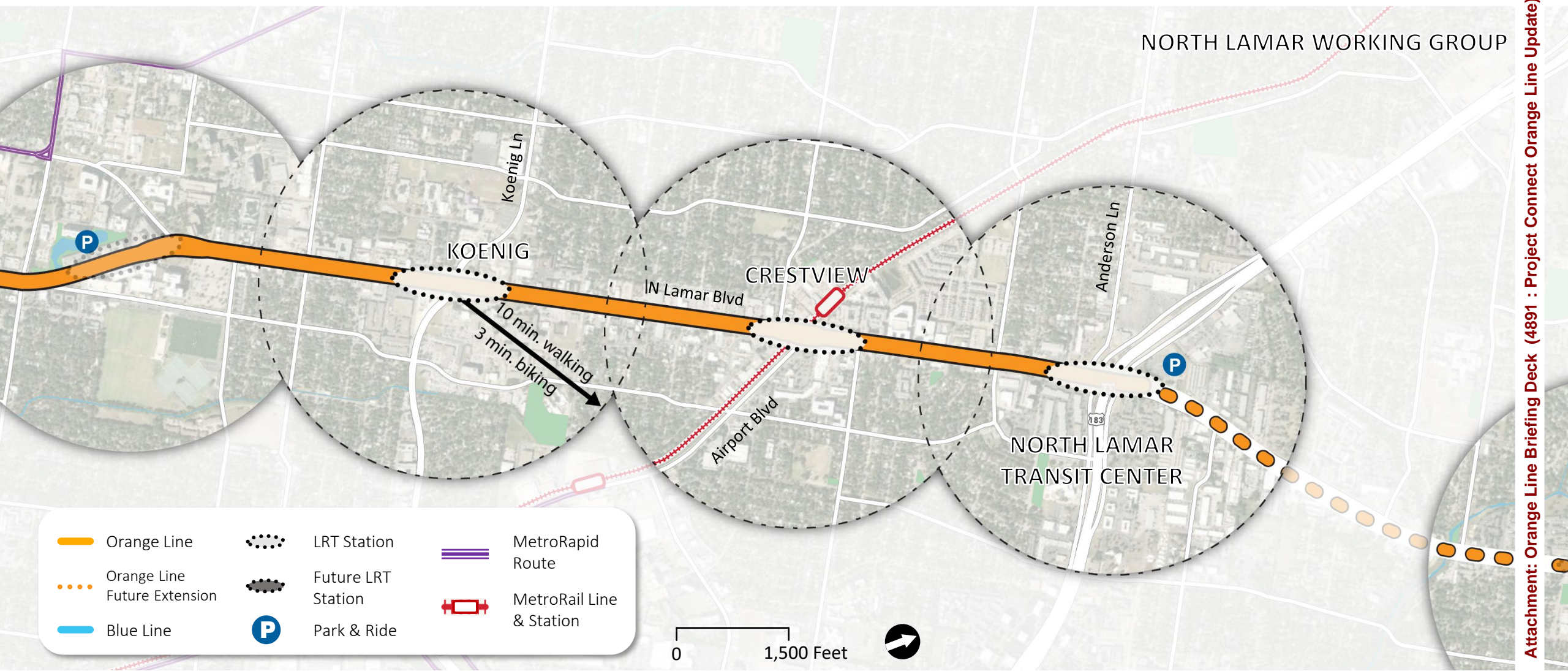
5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line – North Lamar Transit Center to Koenig

Note: Station locations and names subject to change



North Lamar Transit Center and US 183

*Station locations and names subject to change

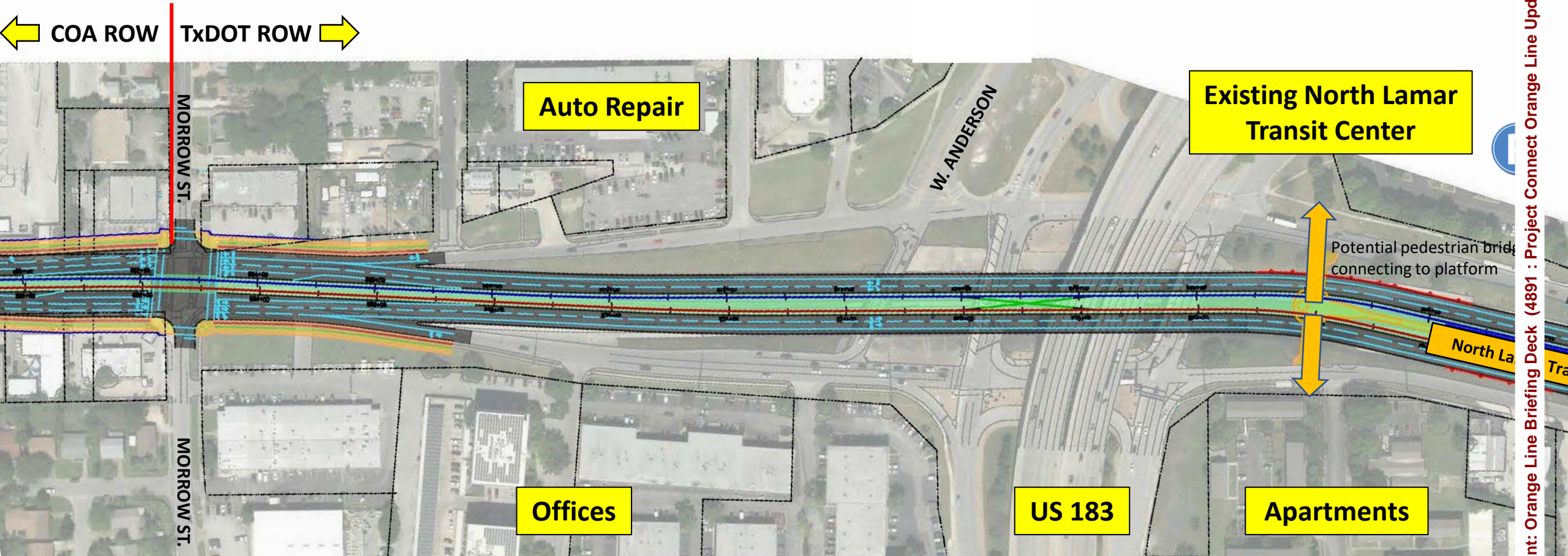
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar to Crestview Station

*Station locations and names subject to change

Elevated Track

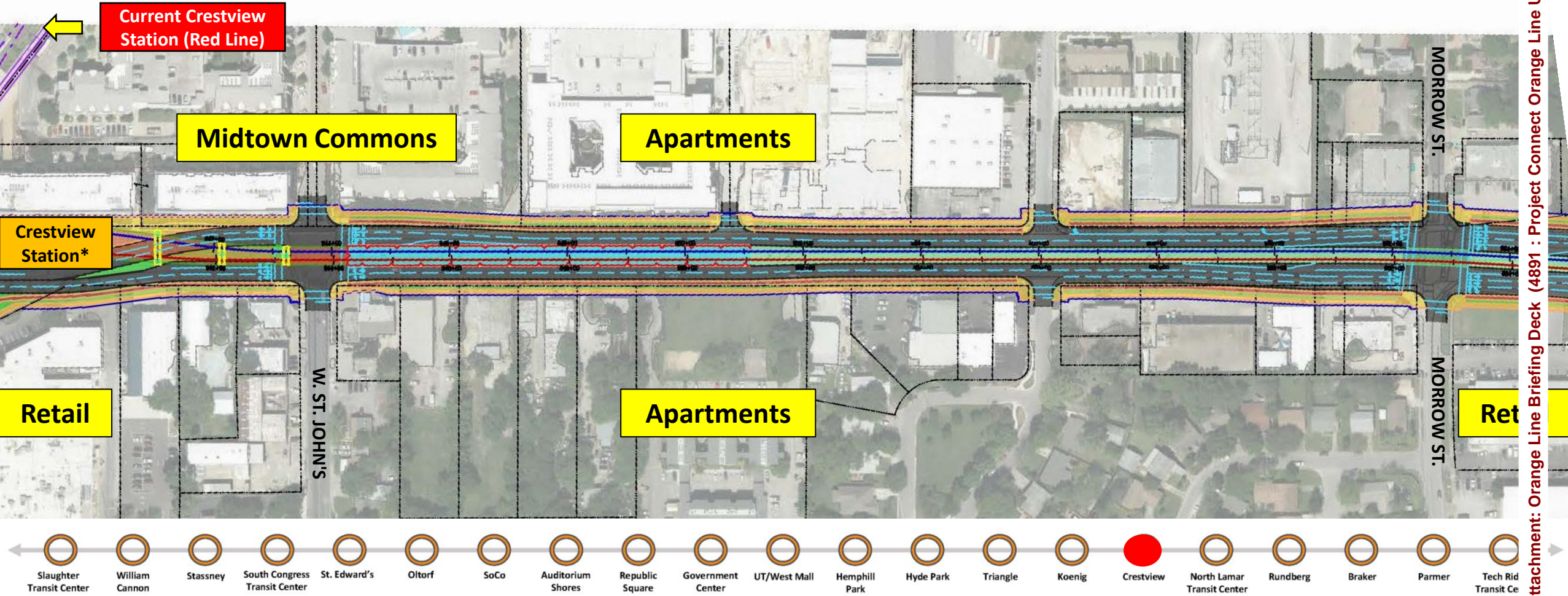
Tree Zone / Median

Roadway

Bikeway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Crestview Station at Airport Blvd.

*Station locations and names subject to change

Elevated Track

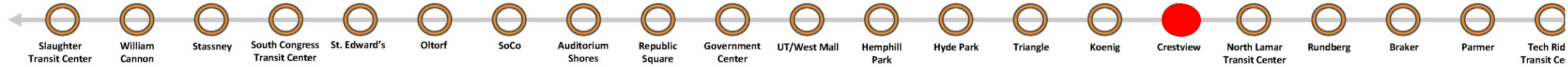
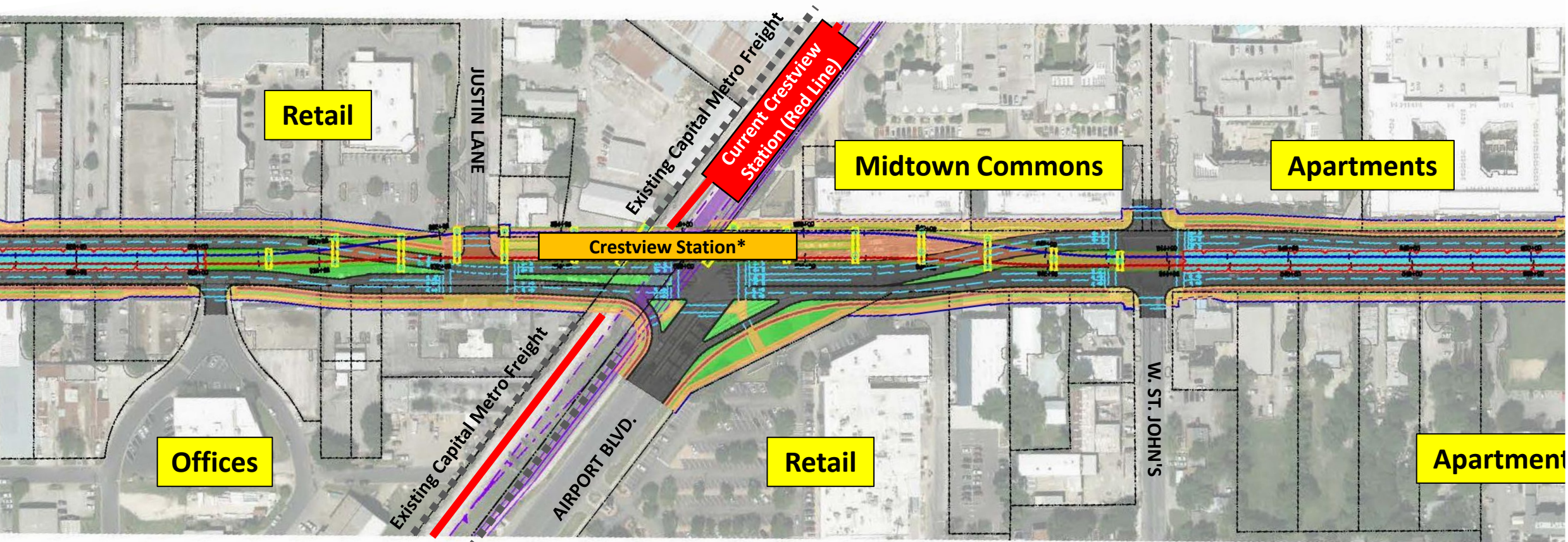
Tree Zone / Median

Roadway

Bikeway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar to Denson Drive

*Station locations and names subject to change

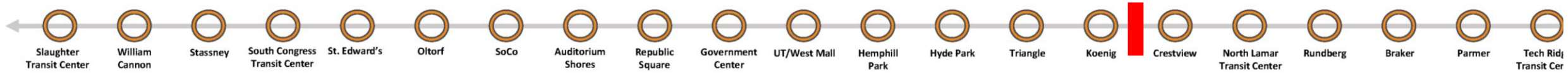
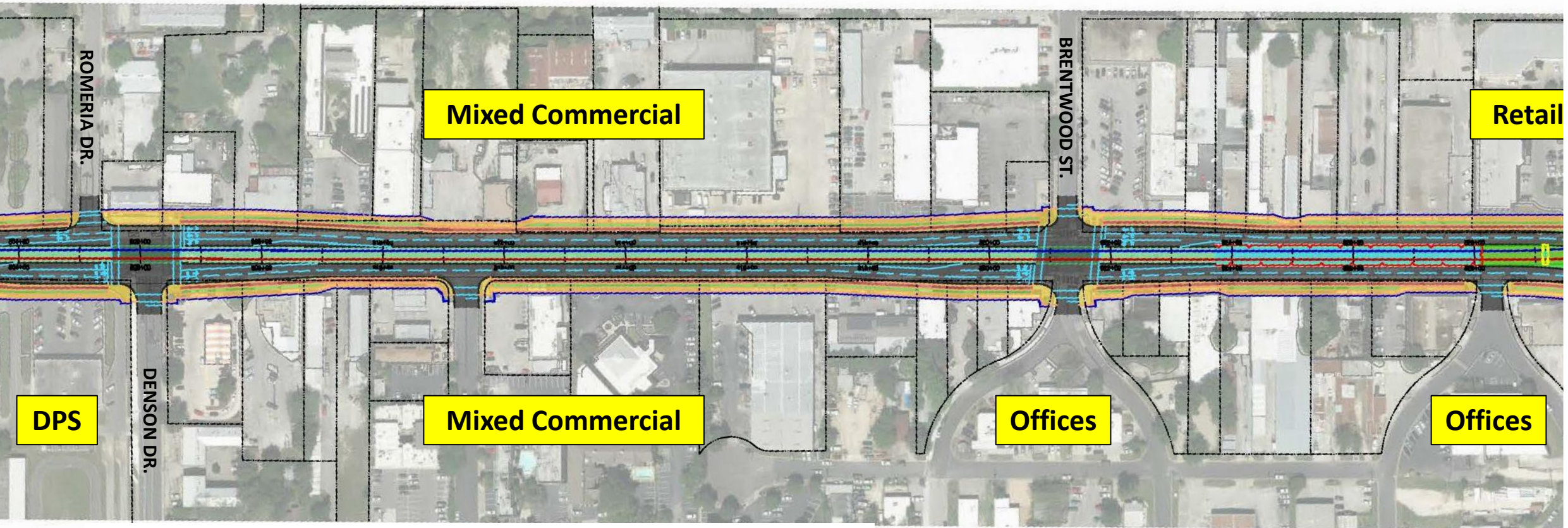
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar at Koenig Station

*Station locations and names subject to change

Tree Zone / Median

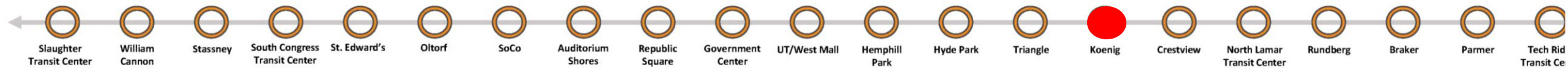
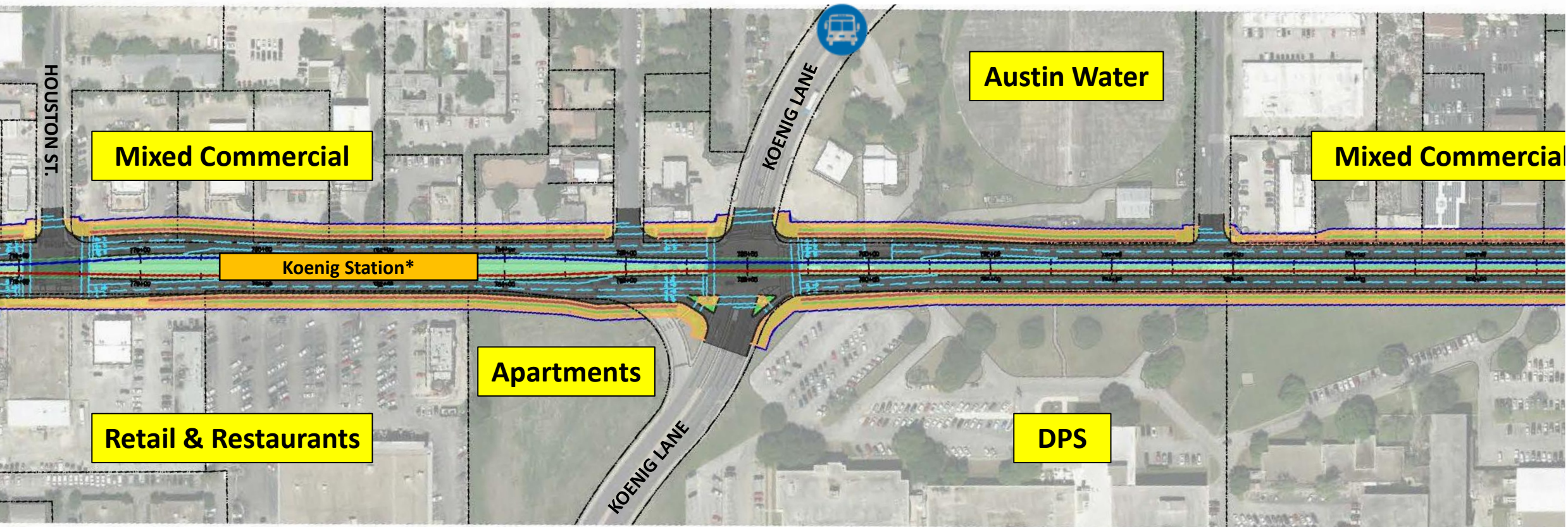
Bikeway

Roadway

Sidewalk

5.5.a

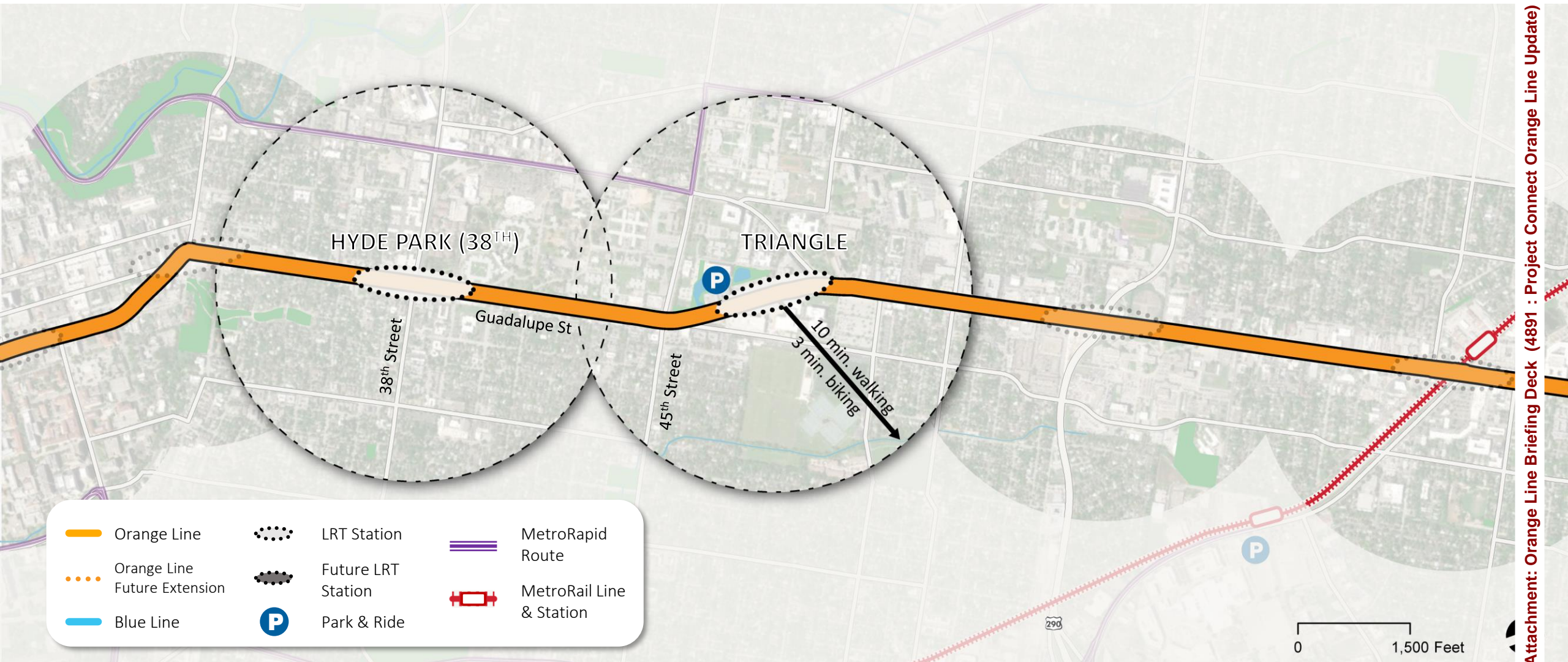
*Local bus connections on Koenig



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line – Koenig to Hyde Park (38th)

Note: Station loc 5.5.a
names subject to change



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Lamar to the Triangle

*Station locations and names subject to change

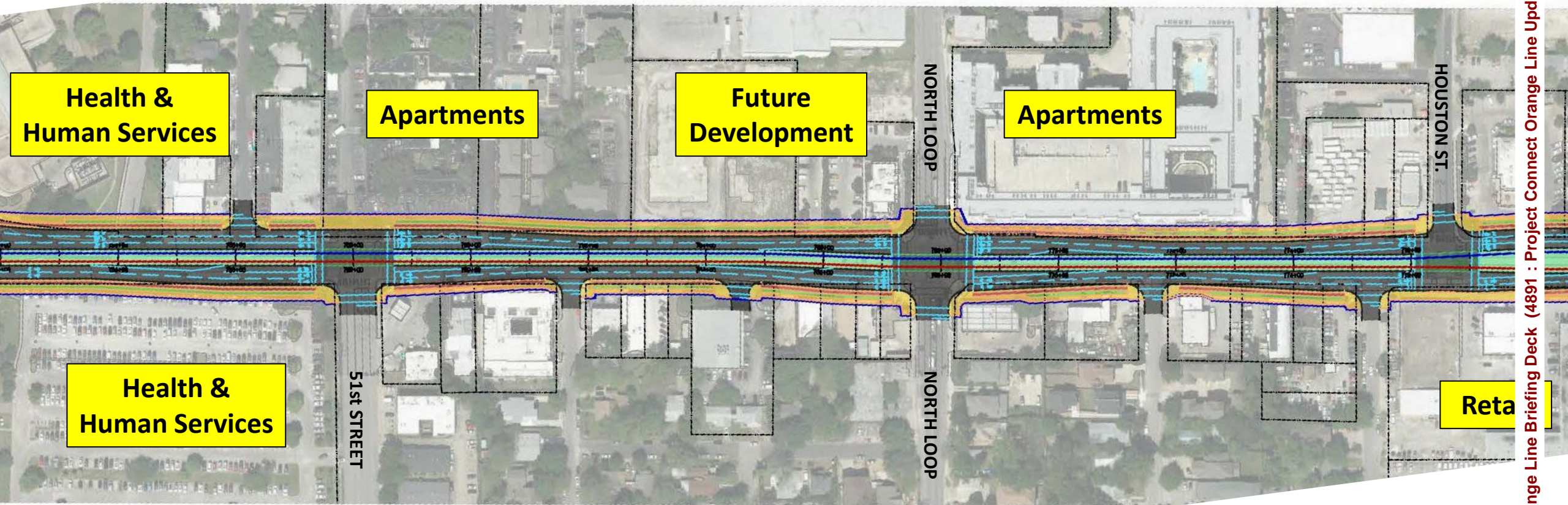
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



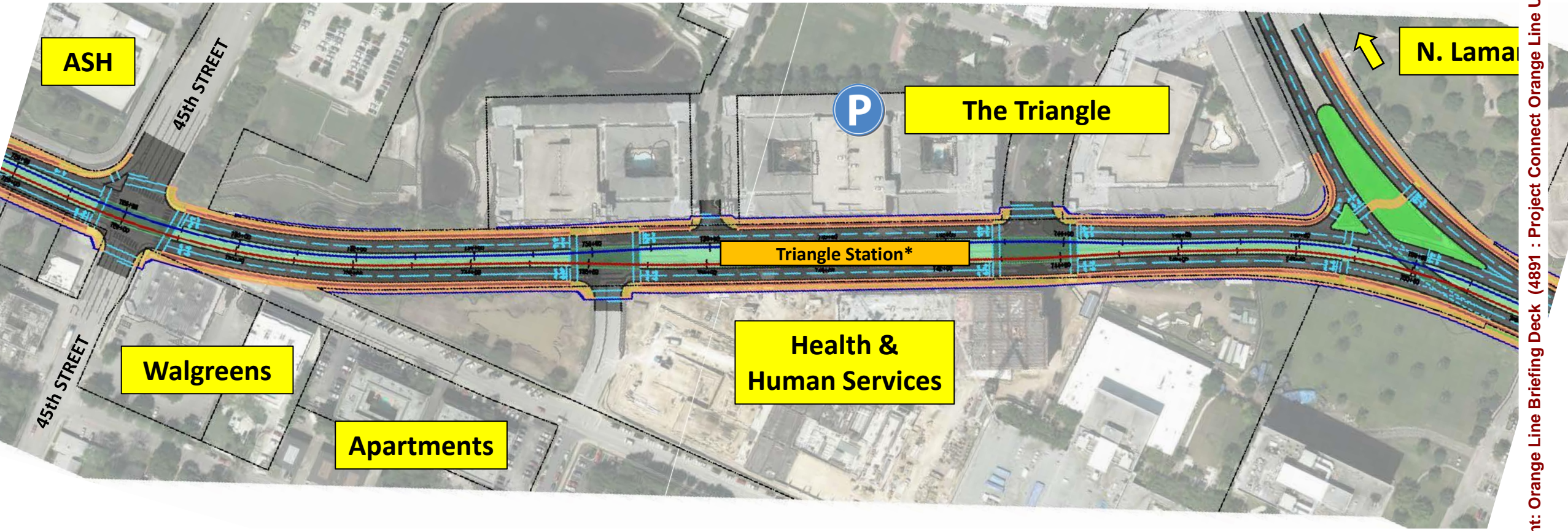
Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Guadalupe at Triangle Station

- Tree Zone / Median

Bikeway
- Roadway

Sidewalk
- 5.5.a



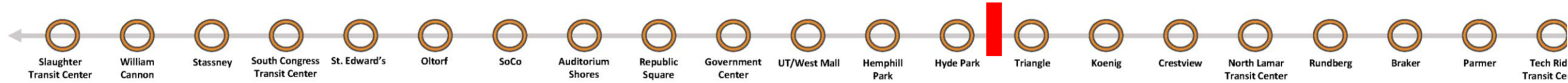
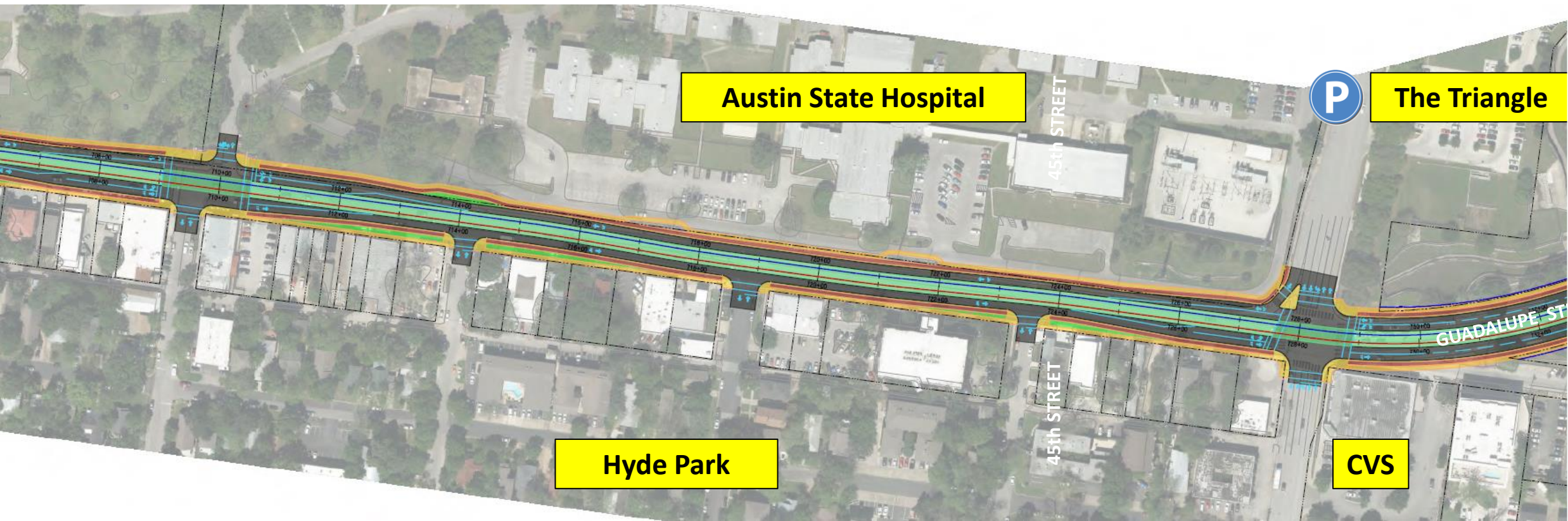
Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Guadalupe (38th – 45th) - Existing Conditions



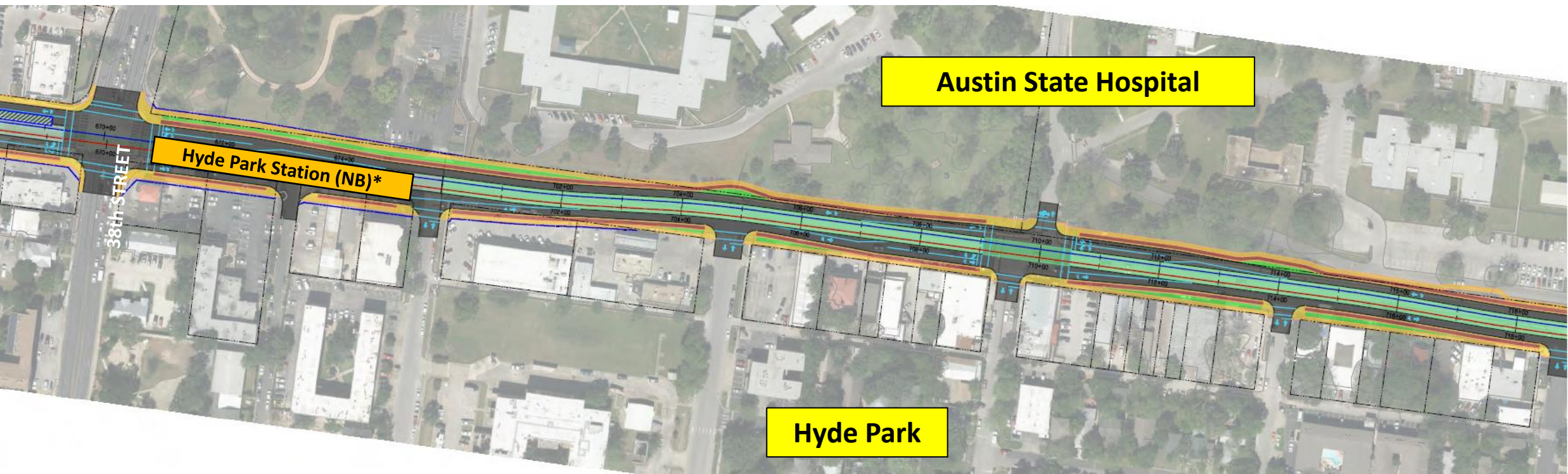
Looking North at 41st Street

North Guadalupe at 45th Street (Austin State Hospital)



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Hyde Park Station & Austin State Hospital



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

North Guadalupe (38th Street to Wheatville)

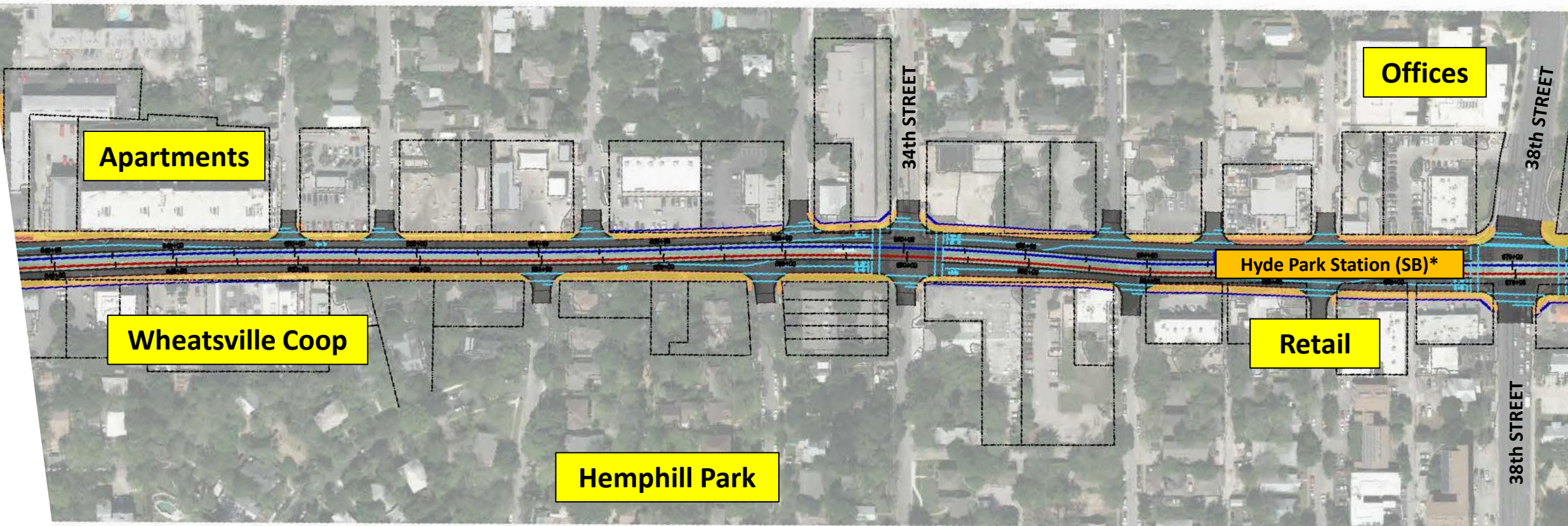
Tree Zone / Median

Bikeway

Roadway

Sidewalk

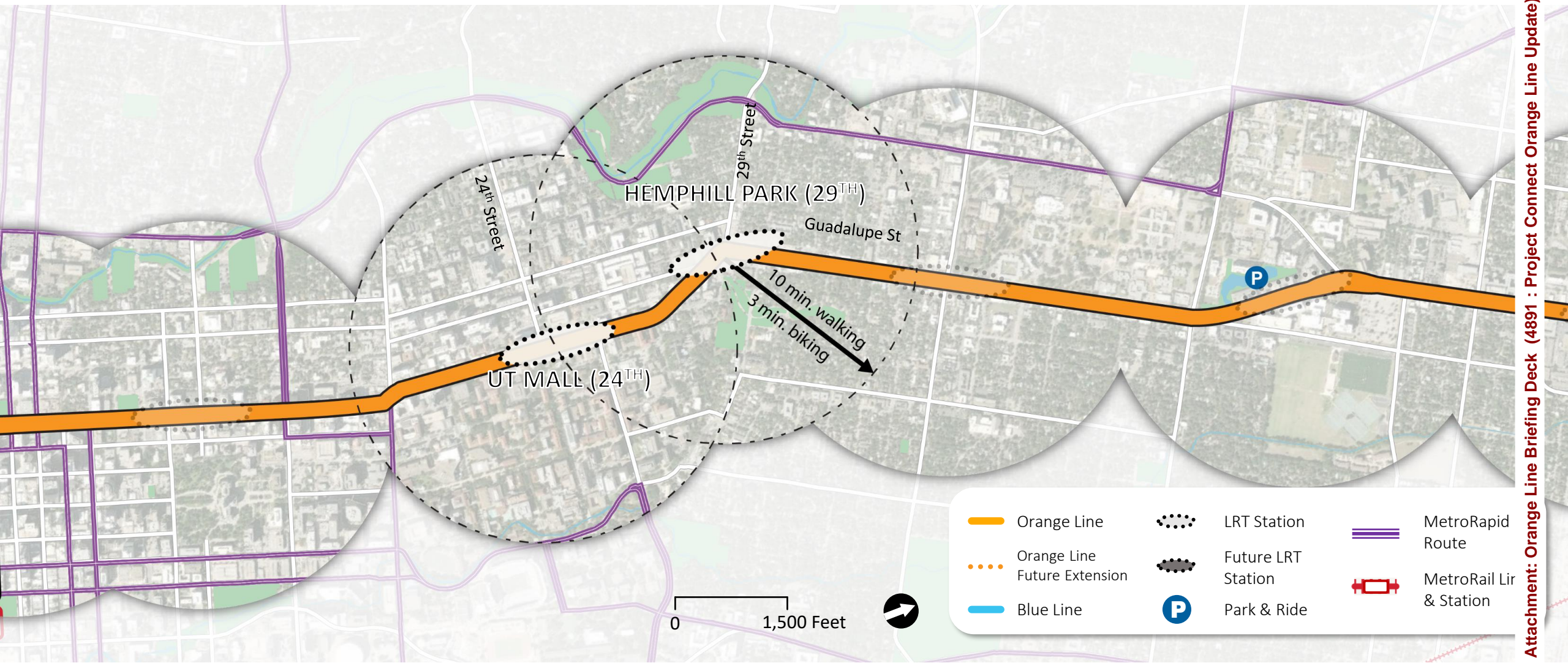
5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line – Hemphill Park to the Drag

Note: Station location names subject to change **5.5.a**



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

The Drag: 29th Street to MLK

*Station locations and names subject to change

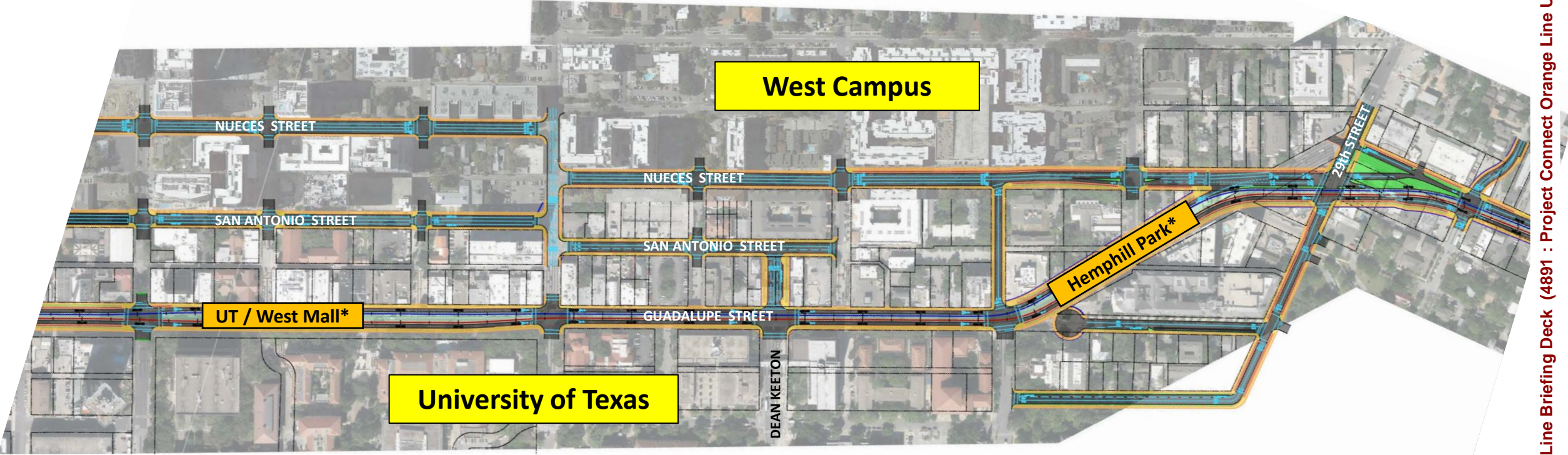
Tree Zone / Median

Bikeway

Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

The Drag – Current conditions



Robust pedestrian and retail activity



Narrow street width



Traffic congestion



Multiple mobility modes

Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

The Drag - Aspirations

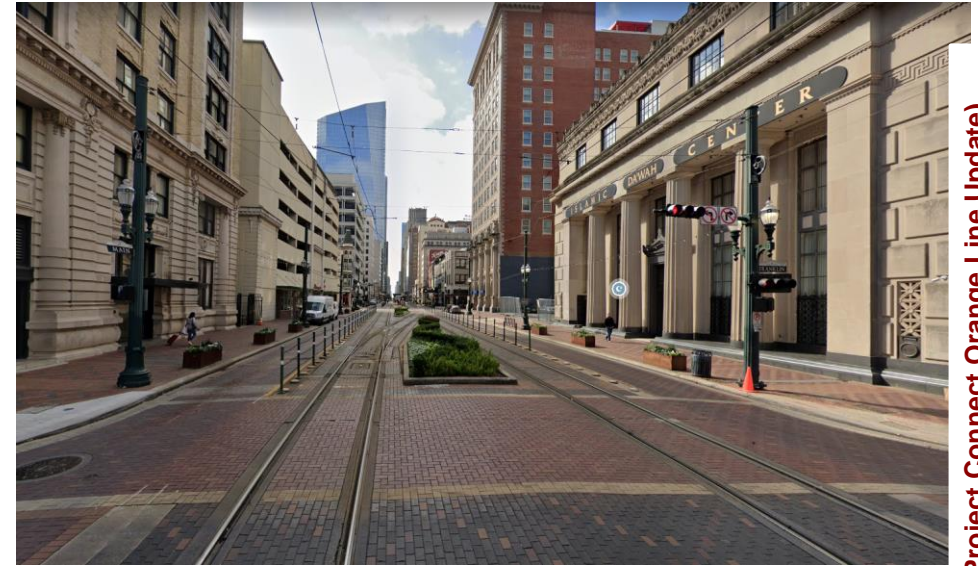
- Enhance the Drag as one of Austin's defining places
 - Enhanced safety and accessibility to UT (students, staff, faculty, visitors), West Campus housing, and local businesses
 - Enhanced pedestrian experience
 - Improved environment for local businesses
- Maintain access for local bus service in addition to new Light Rail Transit (LRT) service
- Maintain north-south vehicular throughput for the area
- Maintain historic UT campus edge

The Drag – Options*

- LRT / Pedestrians and bikes only
- LRT / Bus / Pedestrians and bikes
- LRT / Bus / Pedestrians and bikes / General Purpose Traffic (one lane in each direction)
- Hybrid – different modes in different sections of the Drag

*All options to be considered with community and local stakeholders through the Drag Working Group

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

The Drag - Precedents



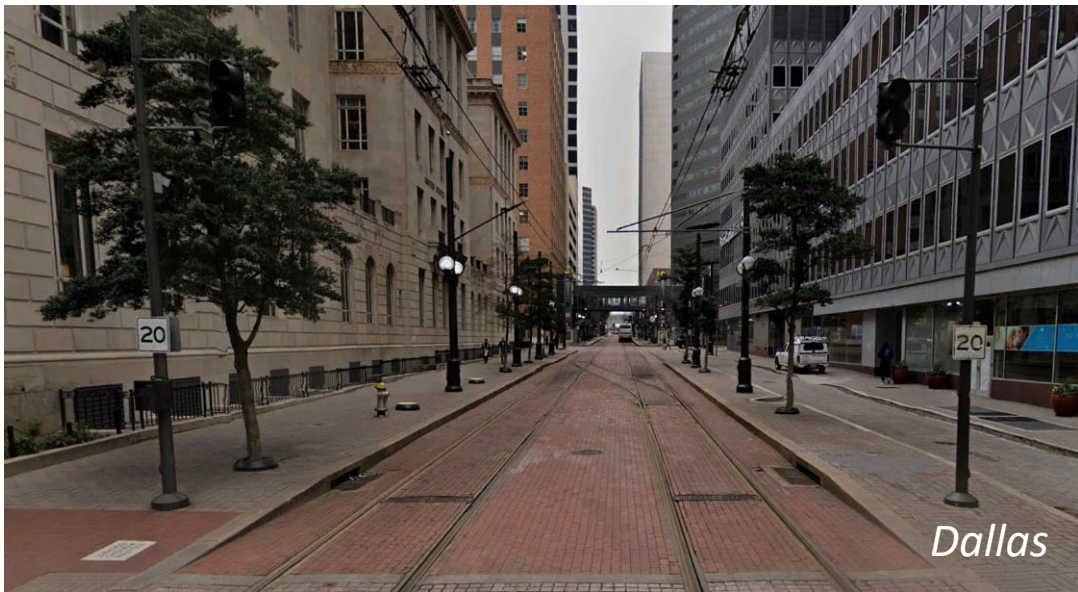
Minneapolis



Auckland, NZ



Denver



Dallas

Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Hemphill Park Station and 29th Street

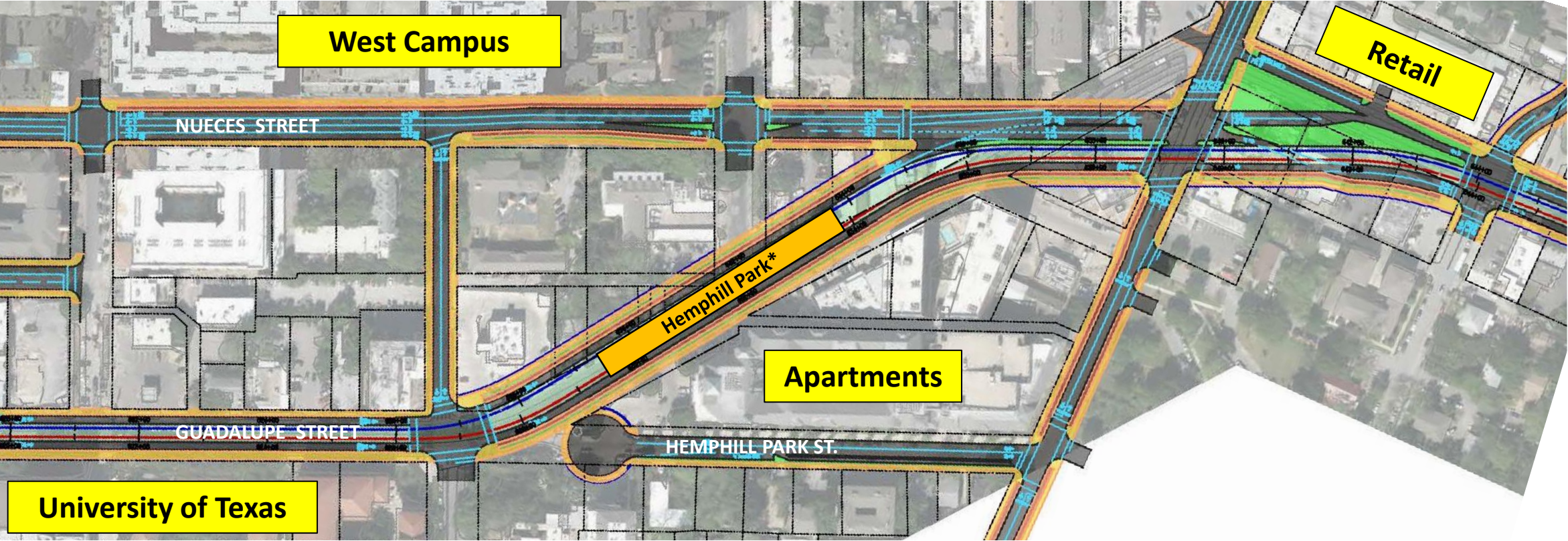
*Station locations and names subject to change

- Tree Zone / Median

Bikeway
- Roadway

Sidewalk

5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Dean Keaton and West Campus

*Station locations and names subject to change

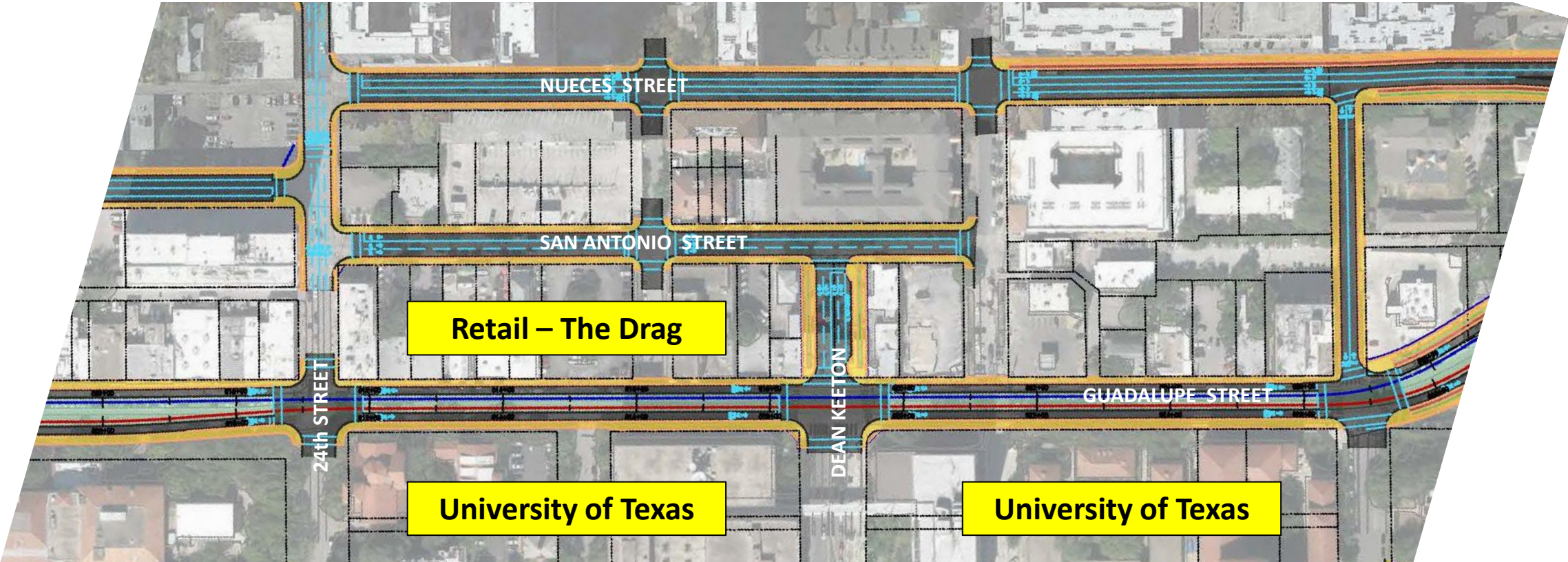
Tree Zone / Median

Bikeway

Roadway

Sidewalk

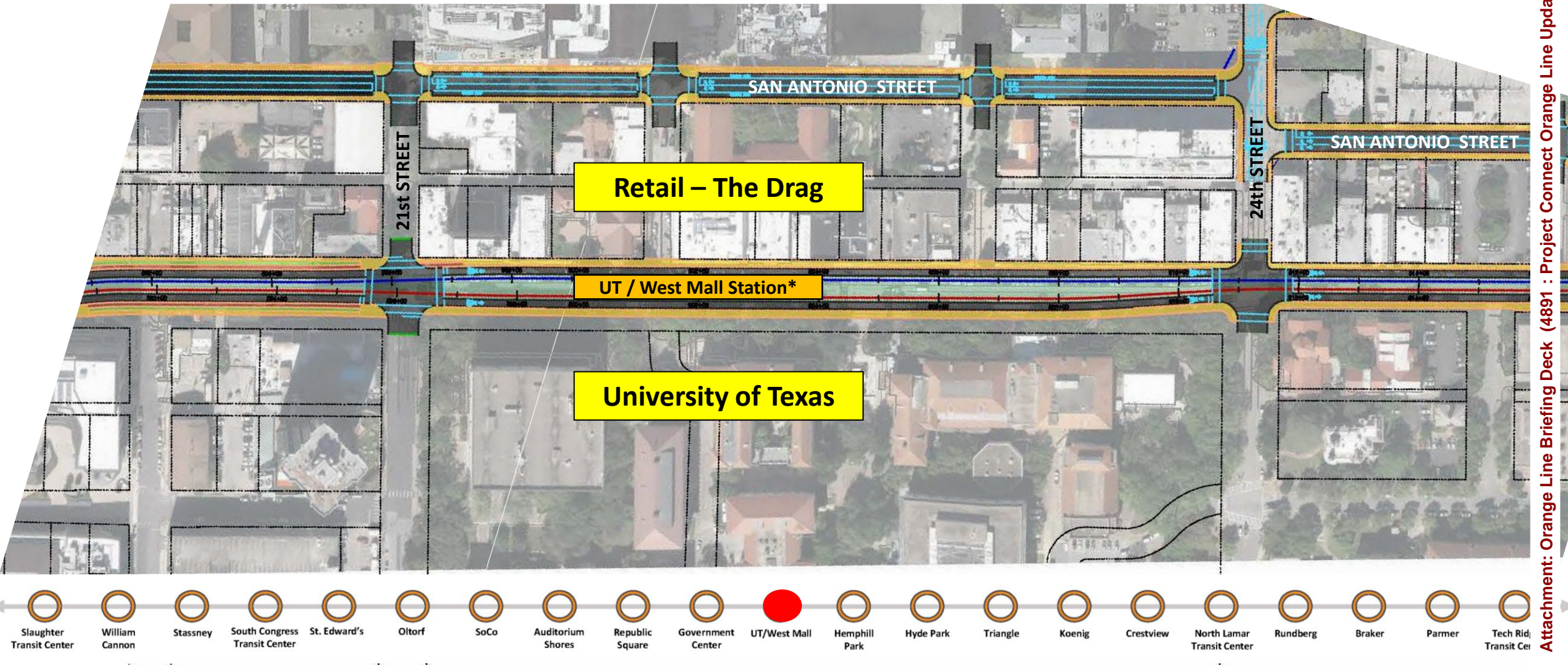
5.5.a



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

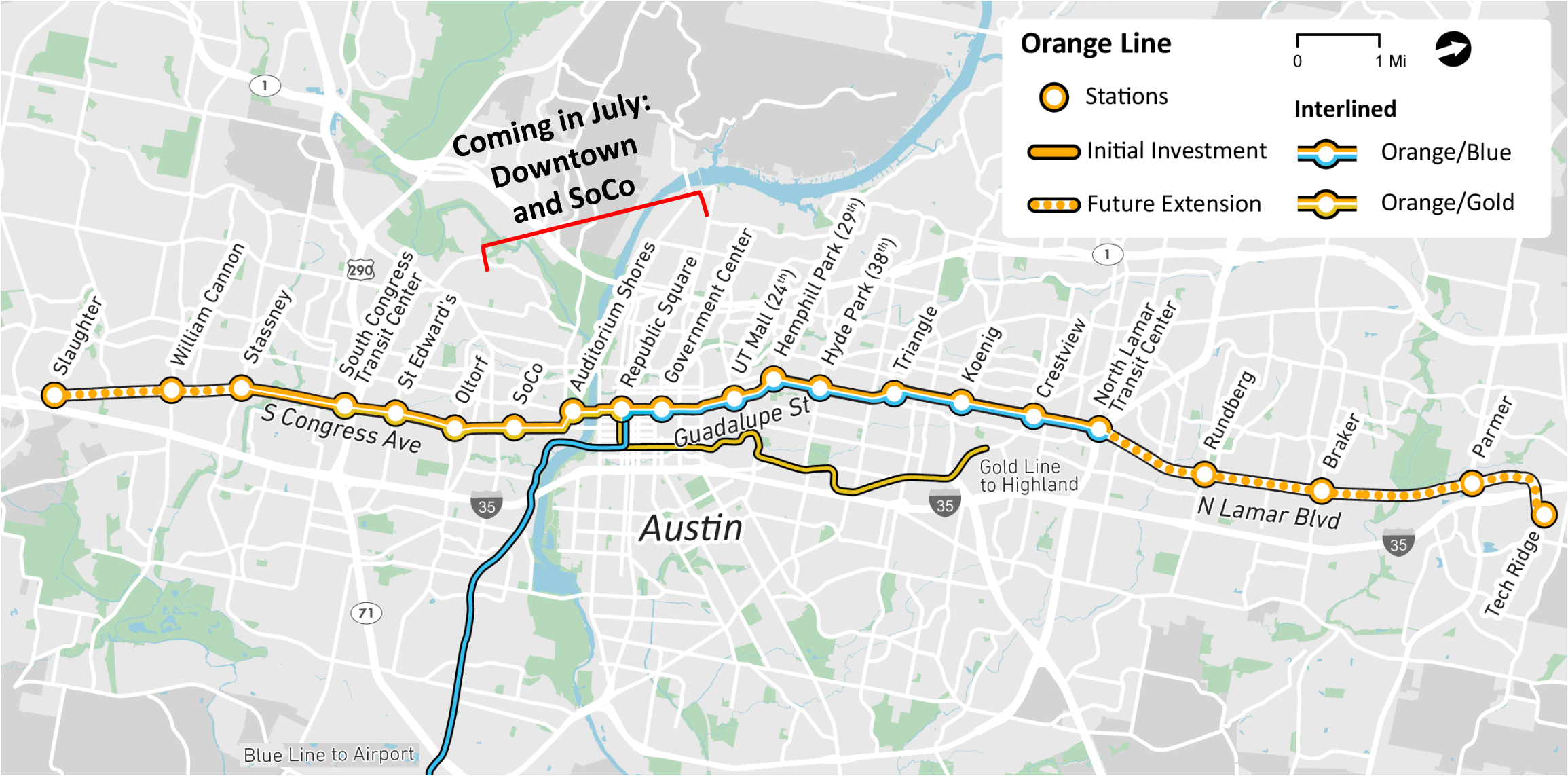
UT / West Mall Station

*Station locations and names subject to change



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Orange Line Stations – July Briefings



Attachment: Orange Line Briefing Deck (4891 : Project Connect Orange Line Update)

Next Steps

- Stakeholder meetings for Orange Line 15-percent design this month, Downtown and SoCo areas in June-July
- Soliciting community comments on 15-percent design for Orange and Blue Lines through Summer 2021 (NEPA milestone). Public meetings on 15-percent design to be held in July
- Continuing to work closely with City of Austin, TxDOT, State of Texas and other partner agency staff on program coordination
- Hold first Technical Advisory Committee (TAC) meetings this month

Orange & Blue Line Key Milestones (2021 – 2022)

