



City of  
**Gainesville**

**REGIONAL  
TRANSIT SYSTEM**

Enhancing the Quality of Life and Transportation In the Gainesville, FL Community

**TITLE VI PLAN  
2022-2025**



**TITLE VI of the CIVIL RIGHTS ACT of 1964**

**PROGRAM UPDATE**

**CITY OF GAINESVILLE, FLORIDA**

**RECIPIENT ID #1084**

**2022 – 2025 Implementation Plan**

**Adopted Date**

**August 2022**

## TABLE OF CONTENTS

I. INTRODUCTION.....	1
II. OVERVIEW OF SERVICES .....	2
III. POLICY STATEMENT AND AUTHORITIES .....	3
IV. NONDISCRIMINATION ASSURANCES TO FDOT .....	5
V. PLAN APPROVAL DOCUMENT .....	5
VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES .....	6
VII. GENERAL REPORTING REQUIREMENTS.....	8
Title VI Notice To The Public.....	9
Title VI Complaint Procedures and Complaint Form .....	11
Transportation-Related Title VI Investigations, Complaints, and Lawsuits.....	15
Public Outreach And Involvement Activities.....	19
RTS Public Participation Plan .....	20
Access For Limited English Proficient (LEP) Persons.....	25
Minority Representation On Planning and Advisory Bodies.....	39
VIII. SERVICE STANDARDS.....	40
IX. APPENDICES.....	45
Appendix A.....	46
Appendix B.....	50
Appendix C.....	51
Appendix D.....	53
Appendix E.....	58
Appendix F.....	61
Appendix G.....	63
Appendix H.....	87
Appendix I.....	89
Appendix J.....	92
Appendix K.....	102
Appendix L.....	105

## I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

During the Obama Administration, the Federal Transit Administration ("FTA") placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency ("LEP").

Recipients of public transportation funding from FTA and the Florida Department of Transportation (FDOT) are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory, as required under Title VI.

This document details how the Regional Transit System, RTS, incorporates nondiscrimination policies and practices in providing services to the public.

## II. OVERVIEW OF SERVICES

Being a part of the City of Gainesville, RTS' mission as a transportation provider is to enhance the quality of life in our community by providing safe, courteous, equitable, reliable and energy-efficient transportation services. Transportation services are provided in accordance with the RTS System Safety and Security Program Plan, Transit Asset Management Plan, Public Transportation Agency Safety Plan and its Transportation Disadvantaged Service Plan.

Our service incorporates fixed-route bus routes connecting the City of Gainesville, the University of Florida (UF), Santa Fe College (SF), and some unincorporated parts of Alachua County. In addition to the fixed-route services, RTS contracts with a for-profit company to provide paratransit service. RTS contracts with MV Contract Transportation, which is a for profit company, to provide ADA complementary paratransit. MV Transportation has been designated as the Community Transportation Coordinator (CTC) by the State of Florida.

RTS transit services fulfill a wide range of trip purposes that include: medical, nutrition, shopping, social services, education, employment, leisure and recreation. The agency primarily uses 40' buses on the fixed-route to provide passenger services. RTS is also providing microtransit services to address last mile/first mile issues related to accessing bus stops and transit services, especially in areas commonly referred to as transit service deserts. The fleet also includes cutaway vans used for paratransit services, and a variety of support vehicles. All service vehicles are equipped for wheelchair service.

RTS' service area covers over 80 square miles, which encompasses the Gainesville metropolitan area and portions of unincorporated Alachua County. Ridership is monitored carefully and routes are assessed for serviceability to riders, and when frequency of overcrowding or underutilization of routes is observed, RTS modifies its routes based on ridership needs. In partnership with local and regional planning agencies, routes and levels of service are also adjusted, based on emerging land development in order to address new service areas. In FY19 RTS provided service on 54 fixed routes and served over 9 million passenger trips. RTS' ADA complementary, non-fixed route paratransit service provides door-to-door service to anyone who is paratransit-certified on an appointment basis. Meeting the community's needs with paratransit service is critical to RTS mission in delivering transportation services to all who need transit mobility. FY19 performance measures document a total ridership of over 55,000 passenger trips on non-fixed routes, utilizing a fleet of 35 paratransit vans. The agency also contracts with another provider for vanpool services, utilizing a fleet of 14 vehicles covering over 280,000 revenue miles. This represents the number of miles covered in these vehicles with car-pool passengers on board. However, due to the pandemic, in FY21 RTS was able to only provide 2.9 million passenger trips on 46 fixed routes. For contracted services, the vanpool service operated only 10 vehicles and completed 146,000 revenue miles.

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally-assisted or not.

The City of Gainesville Regional Transit System (RTS) assures the Florida Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency, and assures the public that as a matter of state and local law in Section 760.01, Florida Statutes, and Chapter 8, Article I, Gainesville Code of Ordinances, in addition to the foregoing, no person shall be excluded on the basis of gender, gender identity, or sexual orientation.

RTS is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

RTS' Title VI Manager will participate in monitoring Title VI activities and other responsibilities, as required by Title 23 Code of Federal Regulations (“CFR”) Part 200, and Title 49 CFR Part 21.

#### Authorities

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

In addition to assuring the Florida Department of Transportation that RTS will not discriminate against any individual on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992, or be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the RTS, the agency further agrees to the following responsibilities with respect to its programs and activities:

1. Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient's Chief Executive Officer or authorized representative.
2. Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient's organization and to the general public. Such information shall be published where appropriate in language other than English.

3. Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
4. Develop a complaint process and attempt to resolve complaints of discrimination against RTS.
5. Participate in training offered on the Title VI and other nondiscrimination requirements.
6. If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.
7. Have a process to collect racial and ethnic data on persons impacted by the agency's programs.

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

Signature

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Jesus Gomez  
Transit Director, RTS

## IV. NONDISCRIMINATION ASSURANCES TO FDOT

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

As part of the Certifications and Assurances submitted to FDOT at the time of grant application and award, RTS will submit a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring ("EEO") and contracting ("DBE"), and nondiscrimination because of a disability ("ADA").

In signing and submitting the assurance, the Regional Transit System confirms to FDOT our commitment to nondiscrimination and compliance with federal and state requirements RTS will remain in compliance with this requirement by annual submission of certifications and assurances as required by FDOT.

## V. PLAN APPROVAL DOCUMENT

This Title VI Implementation Plan 2022-2025 received FDOT concurrence on \_\_\_\_\_. The Plan was approved and adopted by RTS' governing body, the City of Gainesville City Commission, during a meeting held on \_\_\_\_\_. **A copy of the meeting minutes and FDOT concurrence letter are hereby inserted.**

I am committed to ensuring that no person is excluded from participation in, or denied the benefits of RTS transportation services on the basis of race, color or national origin, as protected by Title VI according to FTA Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

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Signature of Authorizing Official

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DATE

Jesus Gomez, Director  
Regional Transit System



## VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of RTS Krys Ochia will serve as the Title VI Manager and, in collaboration with the City of Gainesville staff (Office of Equity and Inclusion), be responsible for ensuring implementation of the transit agency's Title VI program

### Overall Organization for Title VI

RTS Title VI Manager and City of Gainesville staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, reviews and updates, and internal education. Specifically, the responsibilities of RTS Title VI Manager include:

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

### General Title VI responsibilities of the agency

The City of Gainesville is responsible for ensuring the aforementioned elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery, in coordination, as appropriate, with RTS Title VI Manager.

#### 1. Data collection

To ensure that Title VI reporting requirements are met, City and RTS will maintain:

- A database of Title VI transit-related complaints received that tracks the investigation of and response to each complaint.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

#### 2. Annual review of Title VI program

Each year the Agency may review its Title VI program to ensure implementation of the Title VI plan. In addition, RTS Title VI manager may review agency operational guidelines and Publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

### 3. Dissemination of information related to the Title VI program

Information on RTS' Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document and according to federal and state laws/regulations. The Title VI Program will be available in other languages, when needed, according to the LEP plan.

### 4. Resolution of complaints

Any individual may exercise his or her right to file a complaint, if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. The reporting and resolution of complaints will follow procedures identified in City of Gainesville EEO-8: City of Gainesville Office of Equity and Inclusion EEO-8 Policies ([Appendix A](#)).

### 5. Written policies and procedures

RTS' Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise.

### 6. Internal education

RTS employees will receive training on Title VI and procedures, as part of City of Gainesville policies and hiring procedures. The training will include requirements of:

Title VI, and RTS obligations under Title VI. In addition, training will be provided when any Title VI-related policies or procedures change or when appropriate in resolving a complaint.

Title VI training is the responsibility of the City of Gainesville in collaboration with RTS.

### 7. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), RTS' contracts shall include appropriate non-discrimination clauses.

## VII. GENERAL REPORTING REQUIREMENTS

### REQUIREMENTS TO PROVIDE A TITLE VI NOTICE

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

RTS is disseminating this information to the public by posting Title VI Notice:

- (a) On the agency's website,
- (b) In public areas, including the kitchen, employees-only spaces, and drivers' lobby, and
- (c) On federally-funded vehicles in passenger fleet.

RTS also includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

RTS is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on RTS's non-discrimination policies and procedures, or to file a complaint, please visit RTS' website at: [http://go-rts.com/about\\_rts/title-vi](http://go-rts.com/about_rts/title-vi).

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also included within RTS ride guide and other brochures.

- (d) The following is the public notice used by RTS.

## Title VI Notice to the Public



Regional Transit System  
 PO Box 490, Station 5  
 Gainesville, FL 32627-0490  
 (352) 334-2609  
 (352) 334-3681 (fax)  
 www.go-rts.com

### *GAINESVILLE RTS: Title VI Notice to Public*

#### 1. Gainesville Regional Transit System (RTS) Title VI Notice to the Public

RTS operates its transit services without regard to race, color, national origin, age, disability, gender, family or religious status, as provided by Title VI of the Civil Rights Act of 1964 as amended in 1991, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992 and Gainesville Code of Ordinance, Chapter 8, Article 1.

#### 2. RTS Title VI Statement

Title VI of the Civil Rights Act states that no person in the United States shall, on the grounds of race, gender, color, religious or ethnic considerations be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. RTS is committed to complying with the requirements of Title VI in all its federally-funded programs and activities.

#### 3. Making Title VI Complaint

Any person who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Acts of 1964, its amendments and related statutes, by the Gainesville Regional Transit System (RTS) in its role of planning and programming of federal funds, may submit a written complaint. Any such complaint must be in writing and filed with the Office of Equity and Inclusion (formerly known as the Equal Employment Opportunity, EEO) within 180 days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the Office of Equity and inclusion by any of the following methods:

##### 3.1. Internet

Download the Title VI Complaint Form or Title VI Complaint Procedure:

<https://www.go.rts.com/feedback.php#titlevi>

##### 3.2. Walk-in and Mailing Address

Forms can also be picked up at the  
 Old Library Building,  
 222 E University Ave, 2<sup>nd</sup> Fl,  
 Gainesville, FL 32602.

Mail completed forms to  
 City of Gainesville, Office of Equity and Inclusion  
 P.O. Box 490, Mail Station 52  
 Gainesville, FL 32602

OUR VISION: *The City of Gainesville will set the standard of excellence for a top ten mid-sized American city; recognized nationally as an innovative provider of high-quality, cost-effective services.*

### 3.3 Telephone

Contact the Office of Equity and Inclusion by phone to request a Complaint Form:  
352-334-5051

Hearing Impaired: (800) 955-8771

### 3.4. Email/Fax

Send an email to the Office of Equity and Inclusion to request a Complaint Form:  
[equalopportunity@cityofgainesville.org](mailto:equalopportunity@cityofgainesville.org)

[Fax Number: \(352\)334-2088](tel:(352)334-2088)

### 3.5 FTA Civil Rights Complaint

Persons who wish to file a complaint with the FTA are free to email the complaint form to [FTACivilRightsCommunications@dot.gov](mailto:FTACivilRightsCommunications@dot.gov) with “FTA complaint form” included in the subject.

Alternatively, complaints may be mailed to:

Federal Transit Administration  
Office of Civil Rights  
Attention: Complaint Team  
East Building, Fifth Floor –TCR  
1200 New Jersey Avenue, SE

Sample Public Notice in other languages can be found in [Appendix B](#). As part of Title VI requirements, RTS’ sub-recipients are also required to maintain a list of locations where their Title VI Notices have been posted or displayed. However, RTS does not have sub-recipients, as outlined in a letter to the FTA dated August 16, 2021 ([see Appendix C](#)).

## **Title VI Complaint Procedures and Complaint Form**

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

### **Complaint Procedure**

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

### **How to Submit a Title VI Complaint**

Complaints may be submitted for discrimination on the basis of race, color, national origin or language. Any such complaint shall be submitted in writing no later than 180 days after the date the person believes the discrimination occurred. Written complaints shall be submitted to the City of Gainesville, Office of Equity and Inclusion (formerly known as the EEO Office). The Office of Equity and Inclusion shall maintain and follow the complaint procedures outlined in EEO-8 Policies.

All telephone calls, walk-ups, or emails related to discrimination, including those identified in Title VI, shall be directed to the City of Gainesville Office of Equity and Inclusion. The person wishing to file a complaint must complete and sign a Complaint Form and return it by mail to the address on the form or drop the form off at the Office of Equity and Inclusion at City Hall. The Complaint Form can be picked up at the Old Library Building address below or downloaded from the RTS website at: [http://go-rt.com/about\\_rts/title-vi](http://go-rt.com/about_rts/title-vi)

### **Walk-in Address:**

Old Library Building  
222 E. University Ave., 2nd Floor  
Gainesville, FL 32602

### **Phone Numbers:**

(352) 334-5051 (Voice)  
(352) 334-2069 (TDD)

### **Mailing Address:**

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

### **Review of Complaints**

Upon receipt of non-Title VI complaint from a transit customer, RTS will review the complaint and provide a written response within ten (10) business days. For complaints of discrimination, the individual must submit a “Complaint of Discrimination” form to the Office of Equity and Inclusion within one hundred-eighty (180) days of the alleged act of Discrimination.

For complaints related to discrimination, the review will include the gathering of additional information from the complainant and/or the alleged discriminating party(ies). If the complaint is found to have merit, the report of the Office of Equity and Inclusion shall also include proposed resolutions and/or recommended actions, such as:

- Identifying remedial actions that are available to offer redress.
- Identifying possible improvements to the RTS Title VI process.

### **Resolution of Complaints**

For non-discrimination complaints, RTS shall issue a written or email response or complete a telephone call with the complainant within ten (10) working days of receiving the complaint. For complaints related to discrimination, the City of Gainesville Office of Equity and Inclusion Director shall follow the process outlined in EEO-8 for addressing such complaints.

### **Concurrent Complaints and Appeal**

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

### **Complaint Tracking**

The City of Gainesville maintains a database of discrimination complaints that are related to Title VI. This information (excluding details about the complainant) will be available for public review at the City of Gainesville Office of Equity and Inclusion, at 222 E. University Avenue, 2nd Floor, Gainesville, FL 32602, during business hours. The log will include the date of investigation, a summary of allegations, status of investigation, and the action taken by RTS, the recipient of federal funds.

- **Complaint Form**

Copies of the complaint form in English, Spanish and Chinese are provided in **Appendix D** and on RTS’s website (<http://go-rt.com/about-RTS/title-VI>)



- **Record Retention and Reporting Policy**

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

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

- **Sub-recipient Assistance and Monitoring**

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

- **Contractors and Subcontractors**

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

#### 6.1 Non-discrimination clause

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

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.
2. **Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix C of the Regulations.



3. **Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor's obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.
4. **Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the *Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration* as appropriate, and shall set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, RTS shall impose contract sanctions as appropriate, including, but not limited to:
  - a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
  - b. cancellation, termination or suspension of the contract, in whole or in part.
6. **Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the RTS, Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

Since 2009, RTS has contracted with MV Transportation, Inc. as the sole provider of paratransit services in the RTS service area. As part of their contractual obligation and in accordance with Title VI of the Civil Rights Act, MV Transportation does not discriminate on the grounds of race, color, or national origin and it agrees to comply with applicable Federal implementing regulations and other implementing regulations that FTA may issue. MV Transportation notifies employee of their obligation under Title VI

in their employee handbook, as well as informational notices in their employee break room. Any Title VI complaints received by MV Transportation, Inc. are required to be reported to RTS as they occur.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also included within RTS' ride guides, website and brochures.

A copy of the City's Complaint Form (in English) is attached as [Appendix E](#).

## Transportation-Related Title VI Investigations, Complaints, and Lawsuits

### Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to the FTA every three years (3).

1. A summary of these complaints and status is attached as [Appendix F](#).
2. The following is a description of all pending applications for financial assistance and all financial assistance currently provided by other Federal agencies to RTS.

Current & pending FTA funding:

Current Active FTA grants: \$52,303,851.00

FTA Grant	Description	Agency	Date Awarded
FL-2018-009	FTA: 5307 – Capital & Op Asst.	FTA online	1/30/2018
FL-2018-032	FTA: 5307 – Capital & Op Asst.	FTA online	5/21/2018
FL-2018-094	FTA: 5307 – Capital & Op Asst.	FTA online	9/4/2018
FL-2018-041	FTA: U.S.C. 5339 c Competitive Capital Assistance	FTA online	6/28/2018
FL-2018-073	FTA: 49 U.S.C. 5339 ( c) – Capital Asst.	FTA online	8/22/2018
FL-2019-089	FTA 5339-c Competitive	FTA online	9/25/2019

	Capital Assistance		
FL-2019-091	FTA 5307 – Capital & Op Asst.	FTA online	9/25/2019
FL-2020-005	FTA 5339 – Capital Assistance	FTA online	1/9/2020
FL-2020-030	FTA: 5307-6 Emergency Relief CARES Act	FTA online	5/15/2020
FL-2021-012	FTA: 5339-c Competitive Capital Assistance	FTA online	3/5/2021
FL-2020-108	FTA 5307 – Capital & Op Asst.	FTA online	9/11/2020
FL-2020-110	FTA 5339 – Capital Assistance	FTA online	9/21/2020
FL-2021-069	FTA 5307 – Capital & Op Asst.	FTA online	9/8/2021
FL-2021-056	FTA: 5307 Emergency Relief CRRSAA	FTA online	8/17/2021

Current Pending FTA grants: \$40,718,054.00

Grant Appl #	Description	Agency	Date filed
WS00783868	#1084 Gainesville RTS FY22 Route Planning Restoration Application	FTA via Grants.gov	11/15/2021
WS00786177	Gainesville RTS FY21 FTA 5339(b) Bus & Bus Facilities Application	FTA via Grants.gov	11/19/2021
1084-2021-5	FY21 ARP (American Rescue Plan) Relief Funding, RTS, Gainesville FL	FTA	2/7/2022

## Current FDOT funding:

1. Service Development grants: \$5,809,010.00
2. Section 5310 and 5311 grants: \$250,000.00
3. Commuter Assistance grant: \$400,102
4. FY22-23 Block Grant operating assistance grant: \$2,371,784.00

FDOT Grant Number	Service Development Grant Description	Agency	Date Awarded
G1803	Route 33, Yr 2/Op Asst.	FDOT Svc Dev.	5/6/2019
G1J97	Route 33, Yr 3/Op Asst./Ext #1	FDOT Svc Dev	5/20/2020
G1785	Holiday Service, Year 3/Op Asst./Ext #2	FDOT Svc Dev.	5/6/2019
G1784	Route 800, Year 2/Op Asst.	FDOT Svc Dev.	5/1/2019
G1J99	Route 800, Year 3/Op Asst./Ext #1	FDOT Svc Dev.	5/20/2020
G1U96	Autonomous Vehicle Project/Year 2	FDOT Svc Dev.	2/23/2021
G1787	Route 300, Year 3/Op Asst.	FDOT Svc Dev.	5/6/2019
G1786	Route 601(Proj. Connect), Year 1/Op Asst.	FDOT Svc Dev.	5/1/2019
G1K01	Route 150, Yr. 1-3/Op Asst.	FDOT Svc Dev	5/20/2020
Go160	Route 601 (Proj. Connect), Year 2 & 3/Op Asst.	FDOT Svc Dev	6/18/2020
G1788	Signs & TVMs Vending Machines, Year 1/Capital Asst./Ext #2	FDOT Svc Dev.- CAPITAL ONLY	5/6/2019

FDOT Grant Number	5310 & 5311, Commuter Assistance & Block Grants Description	Agency	Date Awarded
G1694	5310-Operating Assistance/trips	FDOT (FTA funds)	4/5/2019
G1B19	Commuter Assistance/Rideshare Van Pool Svc	FDOT	6/26/2019
G1L19	5310-Operating Assistance/trips	FDOT (FTA funds)	4/21/2020
G1L18	5311-Op Asst./trips	FDOT (FTA funds)	4/21/2020
G1M45	5311 CARES Act grant/trips ONLY	FDOT (FTA funds)	6/19/2020
G2587	FY22-23 Block Grant/op assistance	FDOT	2/4/2022
G2585	Commuter Assistance/Rideshare Van Pool Service	FDOT	2/2/2022

Pending FDOT funding:

1. Service Development: \$1,080,000
2. Section 5310 operating assistance grants: \$50,000
3. Section 5310 capital assistance grant: \$530,000
4. Section 5311 capital assistance grant: \$160,152
5. Block grant: none pending at this time

FDOT Application #	Application Description	Agency	Date Filed
N/A	Mobility Enhancements	FDOT	5/4/2021
N/A	Bus Stop Amenities	FDOT	5/4/2021
N/A	Sec. 5310 Operating Assistance (trips)	FDOT	12/17/2021
N/A	Sec. 5310 Capital Assistance (bus)	FDOT	12/17/2021
N/A	Sec. 5311 Capital Assistance 2 vans)	FDOT	12/17/2021
N/A	Sec. 5310 Snr Free Fare	FDOT	2/9/2022

1. Summary of all civil rights compliance reviews conducted by other local, state or Federal agencies in the last three (3) years. Details are shown in [Appendix G](#).

	YEAR	AGENCY CONDUCTING RVEVIEW	RESULT	ACTION(S) TAKEN
REVIEW TYPE				
Triennial	2021	FTA	In Compliance	Completed

## Public Outreach and Involvement Activities

### Introduction

The Public Participation Plan (“PPP”) is a guide for ongoing public participation endeavors. Its purpose is to ensure that RTS utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (“LEP”) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that LEP persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

RTS established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

RTS will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in the agency’s decision-making process.

Examples of effective public outreach practices followed by RTS include:

1. Determining and identifying what meetings and program activities lend themselves to benefit public participation;
2. Scheduling meetings at times and locations that are convenient and accessible to minority and LEP communities.
3. Employing different meeting sizes and formats.
4. Coordinating with community and faith-based organizations, educational institutions, and other organizations to conduct meetings.
5. Radio, television, newspaper ads, and inserts, social media specifically-directed to benefit or serve LEP and minority populations.
6. Attending community meetings, fairs and other events holding in the community.

A copy of RTS's Summary of Outreach Efforts is attached as [Appendix H](#).

## **RTS Public Participation Plan and Procedures**

### **1 Introduction**

Development of premier transit services depends on public outreach that engages local citizens, businesses, regional and corridor-wide governmental bodies, and interested groups. As such, the City of Gainesville's Regional Transit System (RTS) places priority on active, inclusive public involvement, and makes a concerted effort to include minority and Limited English Proficient (LEP) populations and other constituencies that are traditionally underserved during its planning and project development processes. More specifically, RTS recognizes its obligations under Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898, and the Florida Civil Rights Act of 1992, and is therefore committed to ensuring that no person shall, on the basis of race, color, national origin, marital status, handicap, sex, age, disability, family, income, or religious status, be excluded from participation in, be denied the benefits or services of, or be otherwise subjected to discrimination or retaliation under any RTS program or activity.<sup>1</sup> The processes described here are also used for developing RTS service and fare changes in order to address potential disparate and adverse impacts or disproportionate burden, and for setting policies. (For major/minor service and fare changes, see additional information in Appendix K).

To the greatest extent possible, RTS creates unique public involvement plans, tailored to meet the individual needs of each project or activity rather than a single, monolithic document that attempts to cover all situations.<sup>2</sup> For that reason, the following public involvement plan simply summarizes strategies and efforts that RTS pulls from when developing these more definite plans. These public involvement plans are also shaped in accordance with RTS' Transit Development Plan (TDP), which is mandated by

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<sup>1</sup> Persons who require special accommodations under the Americans with Disabilities Act (ADA) or persons who require translation services to participate in public meeting activities are requested to notify RTS at least seven days prior to workshops or meetings. RTS public meeting notices include RTS contact information and a deadline date for requesting special accommodations.

<sup>2</sup> Considerations that go into deciding the type of plan developed include fiscal impact of the action and size of the action (stop-based versus service area based).

Florida Administrative Code (F.A.C) Rule 14-73.001 and submitted to the Florida Department of Transportation (FDOT), and annually updated as an Annual Progress Report, APR. The RTS TDP outlines existing and future conditions, priorities and financial planning strategies, and public outreach approaches and policies for riders and citizens within the service area, with particular attention to LEP customers/citizens. RTS' TDP was developed to be consistent with the Metropolitan Transportation Planning Organization (MTPO) for the Gainesville Urbanized Area's Public Participation Plan.

## **2 Public Participation Plan Techniques**

The public involvement plan contains a variety of techniques to maximize the active participation by citizens or their representatives and to build trustworthiness between RTS and these individuals.<sup>3</sup> These techniques are transparent and flexible and can be classified as direct involvement activities or information distribution activities. The former refers to engaging the public in "hands on" workshops and/or discussions about a project while the latter refers to the dissemination of public information materials.

- **Direct Participation Activities**

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

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

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

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

- Regional Workforce Board (Florida Works)
- University of Florida (UF) and Santa Fe College (SFC)
- UF Health Shands Hospital and Malcom Randall Veterans Administration Medical Center
- Alachua County Housing Authority
- Gainesville Chamber of Commerce
- Gainesville Community Redevelopment Agency
- Transportation Disadvantaged Board
- Builders Association of North Central Florida
- Alachua County School Board

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<sup>3</sup> This acknowledges that individuals' purposes like elected officials are to summarize and represent the opinions of their constituency. This does not imply that RTS bypasses direct interaction with citizens. For example, while RTS frequently uses informational booths on the University of Florida campus to collect information from students, it recognizes the value of speaking with UF officials who receive frequent feedback regarding RTS services and thereby meets every two weeks to confer and obtain updates/input.



- Elected officials from surrounding Communities
- Miscellaneous Community-based organizations, including those representing different ethnic and race-based groups.

2.3 System-wide, statistically valid, on-board surveys of RTS fixed-route bus patrons provide information about passenger demographics, travel behavior, satisfaction, needs, and issues. On-board surveys typically coincide with major updates to the TDP and, the occasional Comprehensive Operational Analyses. The major update to the 10-Year TDP occurs every five years.

RTS also effectively uses non-statistically valid surveys to gather the opinions, ideas, or needs of operators and the community. Some examples include the use of surveys to identify the languages operators speak, and preferred alignments and amenities for possible premium transit services. Social media sites, like Facebook and Twitter, have introduced a whole new range of opportunities for impromptu, informal surveys to gather immediate feedback.<sup>4</sup>

2.4 Public workshops and Open Houses are recognized as effective techniques for obtaining substantive public participation during planning and policy development processes and are the primary mechanism for soliciting public input regarding transit needs and impacts within RTS service area. Public workshop locations are distributed across the RTS service area to ensure substantial spatial coverage and are identified based upon their presence near high frequency transit routes, ability to accommodate the physically disabled, and well-known status in the area.<sup>5</sup> At workshops and public meetings, attendance sheets are provided so individuals who want to stay involved are able to provide their contact information for future outreach and provide comments in case they are uncomfortable speaking in front of a group.

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

- Presentations
- Surveys
- Dot polling (expressing preferences with dots or stickers)
- Visual displays
- Question and answer sessions
- Discussion groups

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<sup>4</sup> In addition to Facebook, the RTS website, project websites like those developed for the Premium Transit Alternatives Analysis, and the TransLoc Automatic Vehicle Location (AVL) interface all allow for customer feedback. These feedback forms are available on each bus, as well and can be filled out directly by a passenger or with the assistance of a driver. RTS maintains the information it receives in a Microsoft Office Access database where it can quickly query input by route, stop, time of day, day, and a host of other variables. RTS looks to this information when planning service changes or making other service recommendations.

<sup>5</sup> RTS most frequently hosts its meetings at City Hall (200 East University Avenue, Gainesville, FL 32601), Gainesville Regional Utility Multi-purpose Room (301 Southeast 4<sup>th</sup> Avenue, Gainesville, FL 32601), or RTS Administration (34 SE 13<sup>th</sup> Road, Gainesville, FL 32601), and in the community, as appropriate. All facilities are within or adjacent to Census Block Groups that are identified by the most recent American Community Survey or United States Census as having above average levels of individuals and households without a vehicle, designated as below poverty, designated as a LEP individual or minority, and a non-high school graduates. It is important to note, however, that this information also shows that these groups are distributed throughout the RTS service area rather than being geographically isolated.

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

2.5 RTS also regularly engages with the community at monthly or bimonthly meetings for:<sup>6</sup>

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

### **3 Information Distribution Activities**

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

- RTS website
- Information booths
- RTS Facebook and YouTube accounts
- Phone-based language interpretation<sup>7</sup>
- City and County websites
- Newspapers, including the Gainesville Sun and Gainesville Guardian<sup>8</sup>
- Florida Administrative Register
- RTS and City facilities, including City Hall, all RTS buses, primary bus stops or transfer locations
- Email distribution lists<sup>9</sup>
- Gainesville Public Television Channel-12

### **4 Measures of Effectiveness**

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

Examples include:

- Participating in a certain number of local job fairs, community organization meetings and events

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<sup>6</sup> RTS Marketing maintains a checklist of required items and actions for all events/meetings, including sign-up sheets, cameras, pencils/pens, schedules, and ridership and bus stop information.

<sup>7</sup> RTS contracts with Language Line to provide phone translation services in over 200 languages.

<sup>8</sup> All RTS public workshops and public meetings are advertised at least one week in advance in these newspapers.

<sup>9</sup> Email distribution lists are compiled from sign-in sheets and used to distribute project reports, surveys, future meeting dates and times.

- Distributing service information to all businesses, community facilities, and residences within a certain distance of RTS routes
- Reducing the number of customer complaints per 100,000 riders.

## **Access for Limited English Proficient (LEP) Persons**

### **RTS Language Assistance Plan for Persons with Limited English Proficiency (“LEP”)**

#### Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program must meet the objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, *Improving Access to Services for Persons with Limited English Proficiency (LEP)*. This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan developed by RTS is based on FTA guidelines.

As required, RTS has developed a written LEP Plan (below). Using 2010 census data and 2013-2017 American Community Survey (ACS) 5-Year Estimates projected to 2022 RTS has evaluated the data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit; therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

#### Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis, as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

#### **U.S. Census Data and American Community Survey**

Data from the US Census Bureau’s American Community Survey (ACS) through [www.census.gov](http://www.census.gov) for RTS shows that the service area includes a total of 10,349 (or 4.07%) persons with Limited English Proficiency (those persons who indicated that they spoke English “not well,” and “not at all”) in the ACS Census.

Information from the ACS also provides more details on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

## Demographic Data, US Census Bureau 2013-2017 Projected to 2022

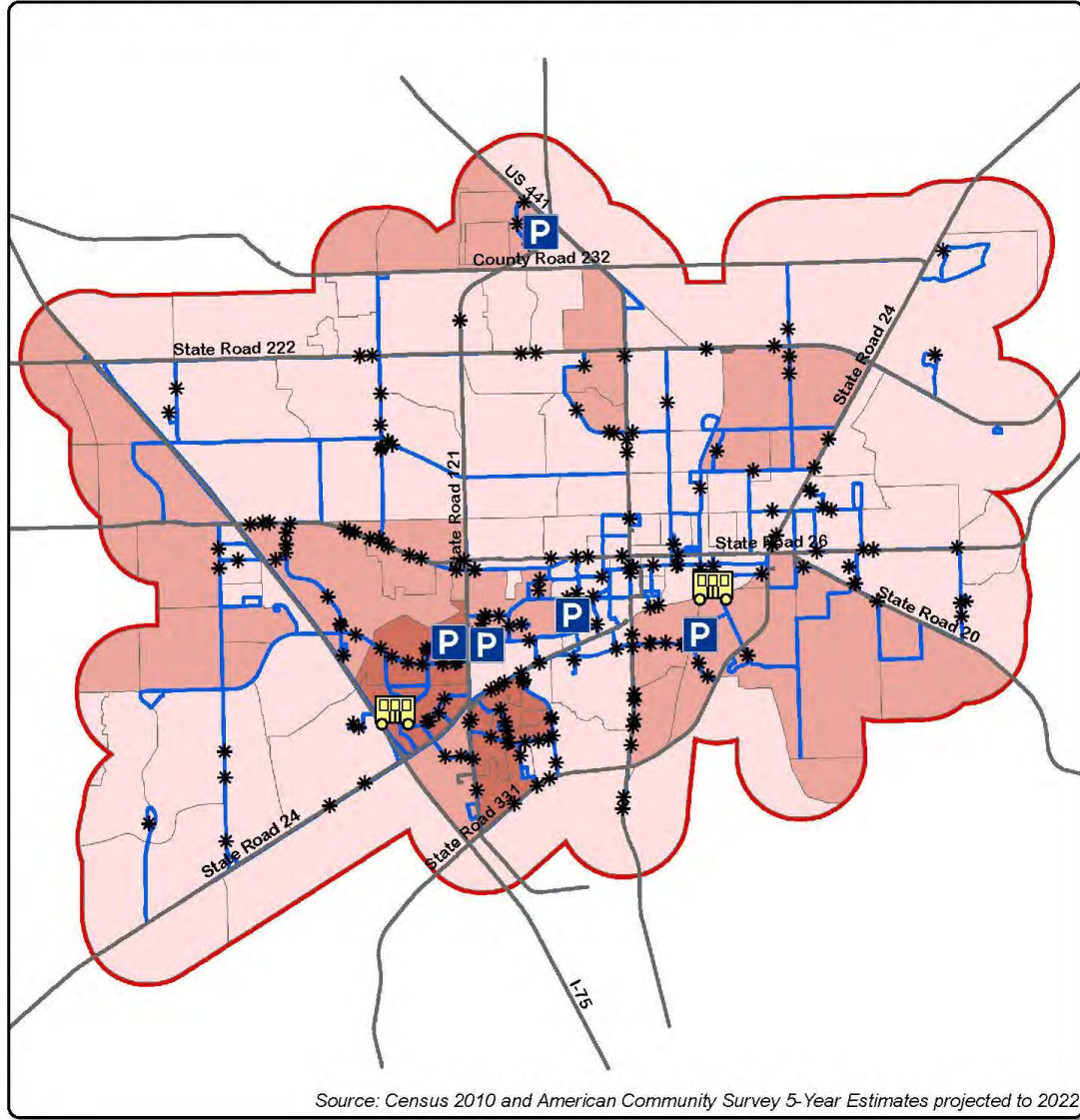
<u>Language</u>	<u>County</u>	<u>Percent of Population</u>
Total	251,345	100%
<b>5 to 17 Years:</b>	33,644	13.39%
Speak Only English	30,167	12.00%
Speak Only Spanish	1,130	0.45%
Speak other Indo-European languages	1,010	0.40%
Speak Asian and Pacific Island languages	1,252	0.50%
Speak other languages	85	0.03%
<b>18 to 64 Years:</b>	181,388	72.17%
Speak Only English	152,503	60.67%

<b>Total:</b>	<b>251,345</b>
Speak only English	215,714
Spanish:	16,230
Speak English "very well"	12,545
Speak English less than "very well"	3,685
French, Haitian, or Cajun:	1,927
Speak English "very well"	1,367
Speak English less than "very well"	560
German or other West Germanic languages:	965
Speak English "very well"	877
Speak English less than "very well"	88
Russian, Polish, or other Slavic languages:	1,247
Speak English "very well"	1,057
Speak English less than "very well"	190
Other Indo-European languages:	4,673
Speak English "very well"	3,414
Speak English less than "very well"	1,259
Korean:	1,399
Speak English "very well"	613
Speak English less than "very well"	786
Chinese (incl. Mandarin, Cantonese):	3,536
Speak English "very well"	2,136

Speak English less than "very well"	1,400
Vietnamese:	1,684
Speak English "very well"	634
Speak English less than "very well"	1,050
Tagalog (incl. Filipino):	1,066
Speak English "very well"	768
Speak English less than "very well"	298
Other Asian and Pacific Island languages:	1,689
Speak English "very well"	988
Speak English less than "very well"	701
Arabic:	675
Speak English "very well"	464
Speak English less than "very well"	211
Other and unspecified languages:	540
Speak English "very well"	419
Speak English less than "very well"	121
<b>Data Source: US Census Bureau ACS Projected to 2022</b>	

For better understanding, a spatial distribution is shown in the map below.

## All Languages: Speak English Less Than "Very Well"



\*Created Using TBEST Software

<p>— Major Roads</p> <p>— RTS Bus Routes</p> <p>▭ RTS Service Area</p> <p>City of <b>Gainesville</b></p>	<p><b>Limited English Proficiency</b></p> <p><b>All Languages</b></p> <p>0 - 5%</p> <p>5 - 10%</p> <p>10 - 25%</p> <p>25 - 50%</p> <p>50 - 100%</p>	<p> Transit Stations</p> <p> Transit Facilities</p> <p> Shelters</p> <p>— Major Roads</p> <p>0 0.5 1 2 3 4 Miles</p>
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**Factor 2:** Assessment of Frequency LEP Individuals Come into Contact with the Transit Services or System

RTS reviewed the relevant benefits, services, and information provided by the agency and determined that LEP persons have encountered these functions through one or more of the following channels

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to RTS customer service telephone line;
- Visits to the agency's headquarters;
- Access to the agency's website;
- Attendance at community meetings or public hearings hosted by RTS; and
- Contact with the agency's ADA complementary para-transit system (including applying for eligibility, making reservations, and communicating with drivers),

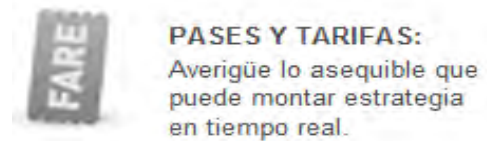
and developed the following analyses to reflect how the agency is involved in serving customers with Limited English Proficiency.

**RTS Experiences with LEP Individuals**

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

*RTS Customer Service Representative and Transit Operator Interactions*

Interviews with CSRs revealed that they only interact with LEP persons on an infrequent basis.<sup>10</sup> Most CSRs felt that even when customers did not speak English well they were still able to communicate at a level that allowed them to figure out how to use the system.



<sup>10</sup> CSRs are located at the Rosa Parks Downtown station and Butler Plaza Transfer Station. These are the primary transfer points for most non-UF based routes.



Figure 1: Transit Operator LEP Persons Survey

**RTS Employee - Limited English Proficient (LEP) Survey**

1. What is your driver number? \_\_\_\_\_

2. How many years have you been with RTS? \_\_\_\_\_

3. What other languages do you speak besides English? \_\_\_\_\_

4. Limited English Proficient (LEP) individuals include those persons who do not speak, read, or understand English well. How often do you encounter LEP people at work?  
 Daily  Weekly  Monthly  Yearly  Never

5. If you are able to tell, which language do you encounter the most?  
 Spanish  Korean  Chinese  French  Other \_\_\_\_\_  
*(Specify)*

6. To the best of your knowledge, which three routes do you encounter the most LEP people?

<input type="checkbox"/> 1 (Downtown to Butler Plaza)	<input type="checkbox"/> 37 (Reitz Union to Butler Plaza)
<input type="checkbox"/> 2 (Downtown to NE Walmart supercenter)	<input type="checkbox"/> 38 (The Hub to Gainesville Place)
<input type="checkbox"/> 3 (Downtown to N Main Post office)	<input type="checkbox"/> 39 (Santa Fe to Airport)
<input type="checkbox"/> 5 (Downtown to Oaks Mall)	<input type="checkbox"/> 40 (The Hub to Hunters Crossing)
<input type="checkbox"/> 6 (Downtown to N Walmart supercenter)	<input type="checkbox"/> 43 (Shands to Santa Fe College)
<input type="checkbox"/> 7 (Downtown to Eastwood Meadows)	<input type="checkbox"/> 46 (Reitz Union to Downtown)
<input type="checkbox"/> 8 (Shands to N Walmart supercenter)	<input type="checkbox"/> 62 (Oaks Mall to Lexington Crossing)
<input type="checkbox"/> 9 (Reitz Union to Hunters Run)	<input type="checkbox"/> 75 (Oaks Mall to Butler Plaza)
<input type="checkbox"/> 10 (Downtown to Santa Fe College)	<input type="checkbox"/> 76 (Santa Fe to Haile Market Square)
<input type="checkbox"/> 11 (Downtown to Eastwood Meadows)	<input type="checkbox"/> 77 (Santa Fe to Cabana Beach Apts)
<input type="checkbox"/> 12 (Reitz Union to Butler Plaza)	<input type="checkbox"/> 711 (Downtown to Eastwood Meadows)
<input type="checkbox"/> 13 (Beaty Towers to Career Source)	<input type="checkbox"/> 117 (Park-N-Ride 2)
<input type="checkbox"/> 15 (Downtown to NW 13th St)	<input type="checkbox"/> 118 (Park-N-Ride 1)
<input type="checkbox"/> 16 (Beaty Towers to Sugar Hill)	<input type="checkbox"/> 119 (Family Housing)
<input type="checkbox"/> 17 (Beaty Towers to Downtown)	<input type="checkbox"/> 120 (West Circulator)
<input type="checkbox"/> 19 (Reitz Union to SW 23rd Terrace)	<input type="checkbox"/> 121 (Commuter Lot)
<input type="checkbox"/> 20 (Reitz Union to Oaks Mall)	<input type="checkbox"/> 122 (UF North South Circulator)
<input type="checkbox"/> 22 (The Hub to Old Archer Rd at SW 34th St)	<input type="checkbox"/> 125 (Lakeside)
<input type="checkbox"/> 23 (Oaks Mall to Santa Fe College)	<input type="checkbox"/> 126 (UF East West Circulator)
<input type="checkbox"/> 24 (Downtown to Job Corps)	<input type="checkbox"/> 127 (East Circulator)
<input type="checkbox"/> 25A (UF Commuter Lot to Airport)	<input type="checkbox"/> 129 (Sorority Row)
<input type="checkbox"/> 26 (Downtown to Airport)	<input type="checkbox"/> 300 (Later Gator A)
<input type="checkbox"/> 27 (Downtown to NE Walmart Supercenter)	<input type="checkbox"/> 301 (Later Gator B)
<input type="checkbox"/> 28 (The Hub to forest Park)	<input type="checkbox"/> 302 (Later Gator C)
<input type="checkbox"/> 29 (Beaty Towers to Kiwanis Park)	<input type="checkbox"/> 303 (Later Gator D)
<input type="checkbox"/> 34 (Hub to Lexington Crossing)	<input type="checkbox"/> 305 (Later Gator E)
<input type="checkbox"/> 35 (Reitz Union to SW 35th Place)	

**RTS Employee - Limited English Proficient (LEP) Survey**

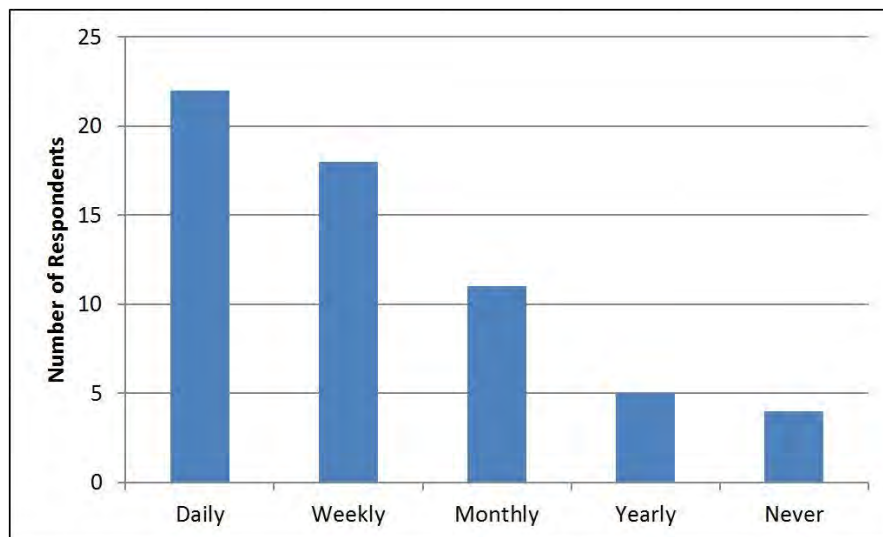
7. If applicable, what is your common response to a customer that has difficulties with English?  
 Contact dispatch  Try to interpret  Ask other people on the bus to interpret  
 Other (Please Explain) \_\_\_\_\_

8. If applicable, describe a specific interaction you have had with a customer that has difficulties with English.  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
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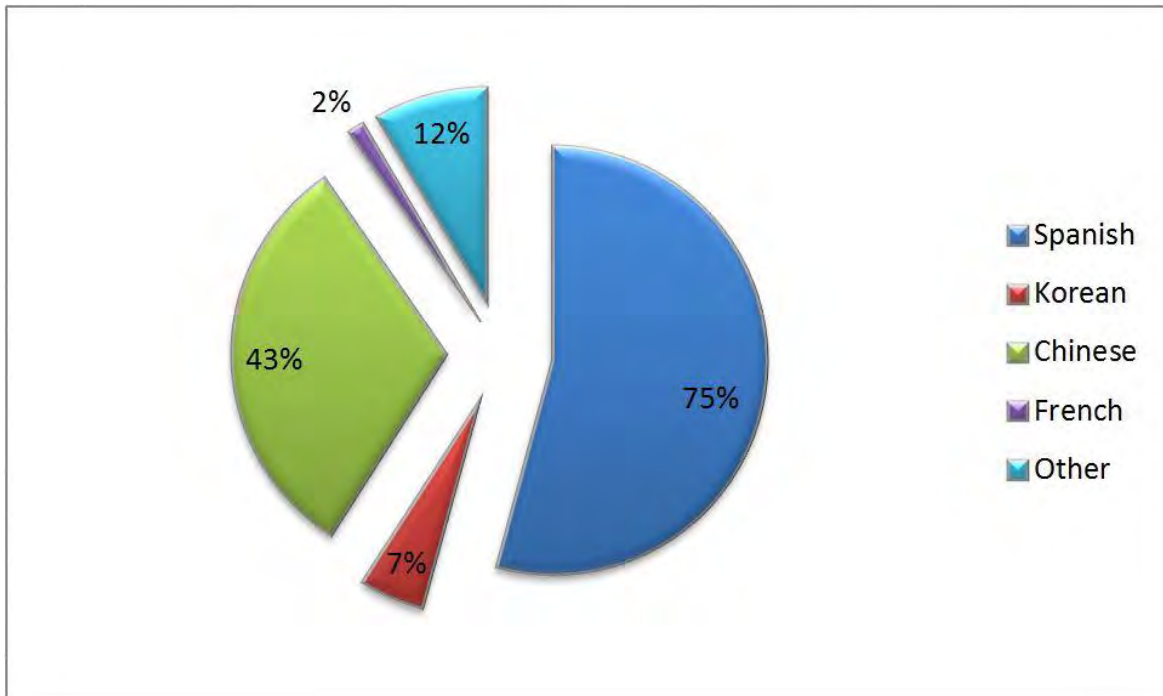
9. If applicable, when you have interacted with a LEP person what is the conversation typically about?  
 Payment  Planning a trip  Schedule  Do not know  
 Other (Please Explain) \_\_\_\_\_

Figure 2 shows that transit operators more frequently encounter LEP persons than CSRs. Of the occurrences, 75% involved Spanish and 43% involved Chinese, see Figure 3 reflecting the routes (1, 5, 12, 20, and 35) that have the most incidences of LEP patrons, according to bus operators.

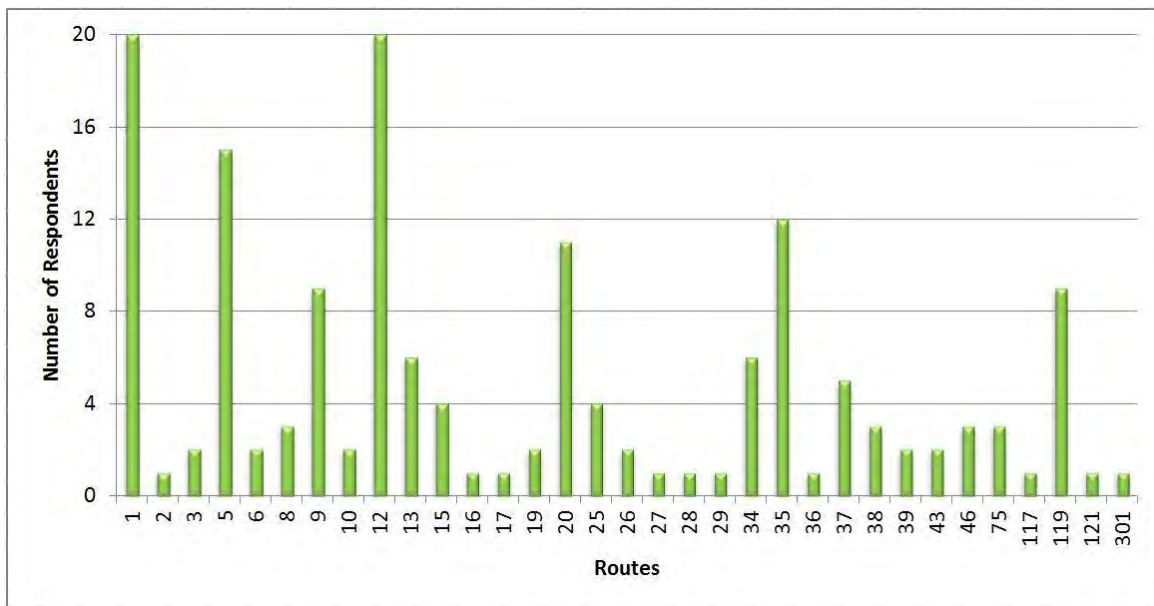
Figure 2: Transit Operator Survey - How Often Drivers Interact with LEP Persons



**Figure 3: Transit Operator Survey – Which Languages Drivers Encounter the Most**



**Figure 4: Transit Operator Survey - Which Routes Encounter More LEP Persons**



RTS recognizes the limitations of memory recall in forming an accurate count of LEP persons encountered and the language they speak, but for current purposes, this suffices to give the agency some working knowledge of its customers.

## Demand Response – MV Transportation Interactions

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

### *Information Obtained from Community-based Organizations*

Following the Factor 1 analysis and operator and CSRs surveys, RTS reached out to Community-based organizations (CBOs) that were perceived as having knowledge on or interaction with Chinese and Spanish LEP populations.<sup>11</sup> RTS felt that these groups could more specifically reveal LEP person interactions with RTS, their transit needs, and their transit desires to assist the agency’s plan development and service needs. The Table below shows the CBOs that RTS contacted, which include government, religious, employment, and university organizations, as well as ethnic restaurants and markets.

### **CBOs contacted**

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

<sup>11</sup> A number of agencies reflected in this table were based on recommendations from other CBOs.

<b>CBO</b>	<b>Completed Survey</b>
<b>La Aurora Latin Market</b>	Yes
<b>Mi Apa Latin Café</b>	
<b>Chun Ching Oriental Food Supply</b>	Yes
<b>Small House Chinese Restaurant</b>	Yes
<b>Gator Suyaki</b>	Yes
<b>Wah Ha Ha Thai Food &amp; Noodle Soup</b>	Yes
<b>Good Fortune Buffet</b>	Yes
<b>Eastern Market</b>	Yes
<b>Oriental Food &amp; Gift Market</b>	Yes

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

### *Chinese CBOs*

The three City of Gainesville Asian markets, four Asian restaurants, and the Gainesville Chinese Christian Church (GCCC) all completed surveys or provided direct input regarding the transit needs of Chinese LEP persons. An example of a completed Chinese CBO survey is shown in the next page.

Figure 5: Chinese Community Based Organization Survey Response

1. 您的单位或组织名称及联系方式（邮件或电话号码）：  
 洪州市场 (Eastmarket)  
 302-371-3085

2. 您单位或组织内部日常用语是：  
 西班牙语  中文  韩语  
 印度语  其他

3. 您单位或组织内英语能力有限人群的年龄段主要为：  
 18 以下  18-24  25-34  
 35-44  45-54  55-64  
 65-74  74 以上  不知道

4. 您单位或组织内英语能力有限人群的性别主要为：  
 男  女

5. 您单位或组织内英语能力有限人群使用公交的比例为：  
 少于 25%  25-50%  51-75%  
 多余 75%  没有  不知道

6. 您单位或组织内英语能力有限人群在盖恩斯维尔市内的主要居住区片为：  
 西北  东北  佛罗里达大学  
 西南  东南  盖恩斯维尔市中心  
 不知道  其他

你所了解的英语能力有限人群对于本市公交系统的意见与建议：  
 车少时间太长

7. 您单位或组织内英语能力有限人群使用公交系统的次数是：  
 1-2 天/周  3-5 天/周  每天  
 每月几次或者更少  从不使用公交

8. 英语能力有限人群出行的主要地点和目的是：  
 在家  医疗  
 工作  宗教活动  
 购物  出游/娱乐  
 学校  其他

9. 英语能力有限人群常去的地点是：  
 超市

10. 请列出本市公交系统服务范围 内英语能力有限人群不方便到达的地点：  
 \_\_\_\_\_

11. 英语能力有限人群有私家车的比例为：  
 少于 25%  25-50%  50-75%  多于 75%  没有车  不知道

12. 如何获得英语能力有限人群的意见与建议：  
 中文交流

13. 英语能力有限人群最信任的代表人是：  
 \_\_\_\_\_

14. 英语能力有限人群认为参加公开会议最合适的地点是：  
 私人机构  政府机关  宗教场所  其他

15. 英语能力有限人群认为参加公开会议最合适的时间是：  
 上午  晚上  周六  周日

16. 你是否愿意本市公交系统在你的单位或组织内张贴发布公交服务的通知？  
 同意  不同意

17. 您单位或组织内部英语能力有限人群是否可以熟练使用他们的母语？  
 是  否

18. 以下哪个方式可以最好的帮助英语能力有限人群享受公交服务？  
 提供“如何阅读时刻表”中文说明  提供中文的票价说明  
 提供中文的地图与时刻表  提供中文的服务变更通知  
 提供中文的活动通知  在车站与车内提供图片说明  
 双语的公交运输系统员工  在公共交通系统网站提供中文信息  
 在公开场合提供双语翻译  在车站与车内提供多语种的自动语音提示

19. 请对以下问题给予评价：

	非常不同意	不同意	中立	同意	非常赞同
英语有限能力人群使用公交时刻表会有困难	1	2	3	4	5
提供多语种公交报知提示会为英语能力有限人群乘坐公交带来便利	1	2	3	4	5
英语能力有限人群无法阅读公交地图	1	2	3	4	5
提供多语种的标识以及车内通知会为乘坐公交带来便利	1	2	3	4	5
公交司机可以为英语能力有限人群提供帮助	1	2	3	4	5

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

### Hispanic CBOs

RTS also reached out to a number of Hispanic CBOs, including the UF English Language Institute, Santa Fe College Adult Education for Speakers of Other Languages (ESOL), and local food service businesses. An example of a completed Hispanic CBO survey can be found below. Similar to the Chinese CBOs, most feedback focused on improving materials that dealt with system navigation. For example, many survey respondents felt that translated electronic system maps and timetables would be the most beneficial to the LEP population. In addition, the English Language Institute felt that more weekend students would benefit from Saturday and Sunday services and that will help the Hispanic LEP population. Overall, though, most CBOs saw a benefit in having all RTS material translated to Spanish, such as event notices and service change announcements (which the agency now provides).

## Hispanic Community Based Organization Survey Response

*La Aurora*

1. ¿Cuál es el nombre de su organización/negocio y a quien deberíamos contactar para más información? (Teléfono y correo electrónico)  
*La Aurora Latin Market*  
*352 271 9035 (Pedro)*

2. ¿Cuál es el idioma hablado por las personas de Ingles limitado (LEP) que usted sirve?  
 Español  Hindi  Chino  Coreano  Otro *English*

3. ¿Cuál es la edad más común de las personas LEP que usted sirve?  
 Menos de 18  18-24  25-34  35-44  45-54  55-64  65-74  Más de 74  No sé

4. ¿Típicamente, cual es el sexo de las personas LEP que usted sirve?  
 Masculino  Femenino

5. ¿Qué porcentaje de las personas LEP que usted sirve usan los buses de RTS?  
 Menos de 25%  25-50%  50-75%  Más de 75%  0  No sé

6. ¿Típicamente, en que área de Gainesville viven las personas LEP que usted sirve?  
 Noroeste  Noreste  UF Campus  Sudoeste  Sudeste  Downtown Gainesville  No sé  Otro

7. ¿Qué expectativas ha expresado esta población LEP de RTS?  
*(Especifique)*

8. ¿Cuántas veces a la semana estima usted que las personas LEP que usted sirve usan el sistema de tránsito?  
 1-2 días  3-5 días  Diario  Una vez al mes o menos  No usan los buses

9. ¿Para qué tipos de viajes usan los autobuses las personas LEP que usted sirve?  
 Casar  Doctor  Trabajo  Religión  Compras  Recreo  Colegio/Universidad  Otro

10. ¿Qué lugares piensa usted que las personas LEP que usted sirve visitan más a menudo?  
*N/A*

11. ¿Qué lugares son los más difíciles para llegar usando RTS para las personas LEP que usted sirve?  
*N/A*

12. ¿Qué porcentaje de las personas LEP que usted sirve tienen su propio carro?  
 Menos de 25%  25-50%  50-75%  Más de 75%  Ningunos  No sé

13. ¿Cuál es la mejor manera de obtener participación de las personas LEP que usted sirve?  
*(Especifique)*

14. ¿En quién confían las personas LEP que usted sirve para mejor presentar mensajes en su idioma?  
*(Especifique)*

15. ¿Dónde estarán más cómodas las personas LEP para una reunión pública?  
 Facilidades Privadas  Facilidades del Gobierno  Lugares Religiosos  Otro *(Especifique)*

16. ¿Cuál sería la hora más cómoda para las personas LEP para una reunión pública?  
 En la mañana  En la tarde  Sábado  Domingo  Otro *(Especifique)*

17. ¿Permitiría usted que RTS coloque información de sus servicios en su facilidad o negocio?  
 Sí  No

18. ¿Piensa usted que la mayoría de las personas LEP que usted sirve leen y escriben bien su propio idioma?  
 Sí  No

19. ¿Cuáles de las siguientes opciones ayudarían a las personas LEP que usted sirve a usar los servicios de RTS?  
 Traducir las instrucciones de como leer los horarios  Traducir las instrucciones de como pagar  Traducir los horarios y mapas del sistema  Traducir los anuncios de cambios de horarios  Traducir notificaciones de eventos  Usar pictogramas en las estaciones y los vehículos  Tener empleados bilingües  Traducir la página web de RTS  Tener intérpretes bilingües en las reuniones públicas  Traducir los anuncios altoparlantes en los vehículos/estaciones

20. Por favor indique su nivel de acuerdo con las siguientes declaraciones:

	Muy en Desacuerdo	En Desacuerdo	Neutral	De Acuerdo	Muy de Acuerdo
Las personas LEP pasan trabajo usando los horarios de los buses	1	2	3	4	5
Usar los buses sería más fácil si hubiesen anuncios en Español	1	2	3	4	5
Las personas LEP no entienden como leer los mapas de los buses	1	2	3	4	5
Usar los buses sería más fácil si los letreros fuesen en Español	1	2	3	4	5
Los conductores de los buses son ayudables a las personas LEP	1	2	3	4	5

\*LEP = Limited English Proficient

As will be seen below, a number of these improvements, such as translated fare payment instructions and, translated information on the RTS website are already offered to the public by RTS.

### Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population

RTS provides the following programs, activities and services:

- **Transit Services**

Public transportation is vital to many people's lives. According to the Department of Transportation's Policy Guidance Concerning Recipient's Responsibilities to LEP persons, providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize public transportation effectively may adversely affect his or her ability to access health care, education, or employment. As a result, RTS provides transit services to meet the needs of the community, including LEP persons.

- **Interpretation services by telephone**

RTS added interpretation call service in July 2013. The most frequent interpretation calls were in Haitian Creole and Spanish. According to FY 2019 Language Line call data, calls in Spanish totaled 42 minutes, and all Haitian Creole calls totaled 40 minutes. However, from January to December 2020, there were 17 calls and calls in Spanish (94.12%) totaled 130 (with one call lasting 38 minutes), and the only other language was Vietnamese (with a single call that lasted

2 minutes).

- **RTS website**  
The website has travel training guide and provides trip planning tool to assist individuals to easily navigate the site. This allows them to plan their trip by inputting trip origin/destination. The result shows what buses to ride and scheduled arrival times. It also shows the bus route in case the traveler wishes to make intermediate stops. In addition, the web site has fare schedule information in major languages
- **Driver/Customer Service Staff training to respond to immediate needs**  
RTS provides bus evacuation information in LEPs' major languages. Given the makeup of RTS driver workforce a good number of drivers also speak other than the English language and are great assets in meeting the needs of LEP persons. For example, driver nametags lets patron know that the driver is available and ready to provide on the spot translation services, as appropriate.
- **Complaint processes in major languages**  
As shown in Appendices A & C RTS' complaint process is explained in other languages to facilitate the process.
- **Interpreters at public/community meetings**  
Through the City of Gainesville, interpreters are provided at public meetings to assist community members who have limited ability to speak and/or understand the English language.

Based on past experience serving and communicating with LEP persons, and interviews conducted as part of RTS transit planning services, the agency has learned that the following routes, in addition to services provided in the preceding discussion, are of particular importance to LEP customers in the community, and those are Routes 1, 5, 12, 20 and 35. Again these individuals and low income/minority residents are spatially distributed throughout RTS' service area. Incidentally, these routes connect the existing transfer stations and major shopping centers and pass through the University of Florida.

The following are the most critical services provided by RTS for all customers, including LEP persons:

- Safety and security awareness instructions;
- Emergency evacuation procedures;
- Public transit services;
- ADA paratransit services (as a pass-through agency);
- Vanpooling services (as a pass-through agency);
- Microtransit Last Mile/First Mile services currently targeted at low income and minority/LEP neighborhoods with limited fixed route services.

#### Factor 4: Assessment of Resources Available to the Agency and Costs

RTS currently provides the following LEP services as part of Transit Operations and Customer Services:

- The RTS website is available in over 50 languages using the Google translation widget.

Universal symbols to convey system information





- System maps and bus schedules in major languages.
- Title VI Notice to the Public, Title VI Complaint Procedure, and (Title VI) Complaint Form in Spanish and Chinese;
- Phone Translation Services for Customer Service calls made to RTS.
- Pictographs and signs in vehicles depict and emphasize common instructions.

We anticipate that these activities (and cost) may increase as follows:

- Calls to RTS as the population increases and the service area expands;
- Requests for telephone calls for translation services increases;
- As RTS acquires and installs/upgrades additional communication software to enhance bus services; and,
- As the agency expands services to existing transit deserts.

Based on the analysis of demographic data and contacts with community organizations and LEP persons, RTS has determined that no additional service areas may be needed in order to provide meaningful services. RTS appears to cover those areas relevant for LEP persons (and others) to benefit from services provided by the agency, especially as the agency expands MOD (Mobility on Demand) Zones for Microtransit, Last-Mile/First-Mile, transit services.

### LEP Implementation Plan

Through the four-factor analysis, RTS determined that the following types of language assistance are most needed and feasible and are being delivered:

A. Translation of vital documents into Spanish. These documents include

- Fare structure
- How to ride the bus
- Trip planning
- Printed materials on ADA Paratransit service
- Bus emergency evacuation

B. Language Line Translation Services for telephone contacts

*Staff Access to Language Assistance Services:*

RTS drivers provide a diversity of language backgrounds. As front line staff, they have access on the bus to multiple documents that they can make available to LEP persons. Customer Service Representatives at the two RTS transfer stations have information about City of Gainesville/RTS Language Line Translation Services for telephone contacts. Moreover, staffs are willing to assist candidates who need translation during driver (operator) job interviews.

*Responding to LEP Callers:*

These callers typically have a friend or relative dial the phone. They help them to explain what language the actual caller needs help with. The City has a list of individuals who will be contacted through Telephone Translation services.



### *Responding to Written Communications from LEP Persons*

Based on RTS records, the agency rarely receives written communication in other than English.

### *Responding to LEP Individuals in Person*

Lobby clerks have been trained on how to handle visits by LEP persons. Typically, an LEP person arrives with a friend or relative who is relatively more fluent in English. Lobby Clerks have a list of administrative staff and drivers who are fluent in the major languages. They are called upon to serve as interpreters for the visitor.

### *Staff Training*

In addition to printing brochures, Marketing Staff also provides training to RTS staff that addresses:

1. Awareness of the type of language services available and how LEP persons can obtain these services.
2. How to respond to calls from LEP persons.
3. How to document encounters with LEP persons.
4. How to respond to a Title VI complaint (found at <http://go-rtis.com/title-vi/>)

In addition, each summer all operators participate in a weeklong training course. Since summer 2013, the course has featured a presentation on Title VI responsibilities. During the course, City staff present information regarding Title VI requirements to operators. Operators are reminded of the availability of translated schedules, a phone translation service, and the requirement to notify dispatch of all encounters with LEP persons. Each Title VI presentation is followed by a question and answer session that go over appropriate and inappropriate responses to LEP individuals, as well as ideas for better interaction with these customers. From these interactions, RTS develops, distributes and has available information brochures/handouts/leaflets on frequently asked transit questions in English, Chinese, and Spanish.

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

### *Providing Notice to LEP Persons*

LEP persons are notified of the availability of language assistance through the following:

- RTS Title VI policy statement included on agency's vital documents;
- On RTS website, with links to translations of vital documents in other languages;
- Through signs posted on RTS vehicles and in customer service and administrative offices;
- Through ongoing outreach efforts to community organizations and institutions;
- Use of an automated telephone menu system in the most common languages encountered;

- RTS language translation line identified on all materials; and.
- Staffing a table with bilingual staff at community service events of interest to LEP groups.

### Monitoring, Evaluating and Updating RTS LEP Plan

At least every three years, this plan is updated to reflect LEP community needs identified through feedback, demographic data and resource priorities. RTS will review staff and phone translation service records to assess the number of encounters with LEP persons (by language) experienced by RTS. RTS will also assess the rate at which it distributes translated materials, including online and electronically. It will be important for RTS to consider if continued low consumption of these materials is due to the relatively small proportion of LEP individuals in the RTS service area, or other possible factors. RTS will continue to enhance use of modern technology to increase the accessibility of LEP material and information. Additionally, continuous collaboration and consultation with relevant Community Based Organizations will be critical to the evaluation and update to assist in gauging the adequacy of LEP services provided by RTS. It is important to note that certain services will always be provided regardless of their consumption rate, like the translated Title VI notice and form, while others may be adjusted, like the number of hard copies of translated brochures, as these could be done through Google Translate. Irrespective of this assertion, as the community grows and new LEP groups emerge, RTS will strive to address the needs for additional language assistance.

Excerpt from Spanish “Rules of the Road” brochure



A copy of RTS' Language Assistance Plan is attached as **Appendix I**

### Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, **“deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”**

The RTS Citizen’s Advisory Board (CAB) is appointed by the Gainesville City Commission. Open vacancies are duly advertised and applicants are evaluated and appointed by the Board during a public meeting. The Board can only evaluate applicants who have formally applied to fill the open vacancy; therefore, this criterion may not apply.

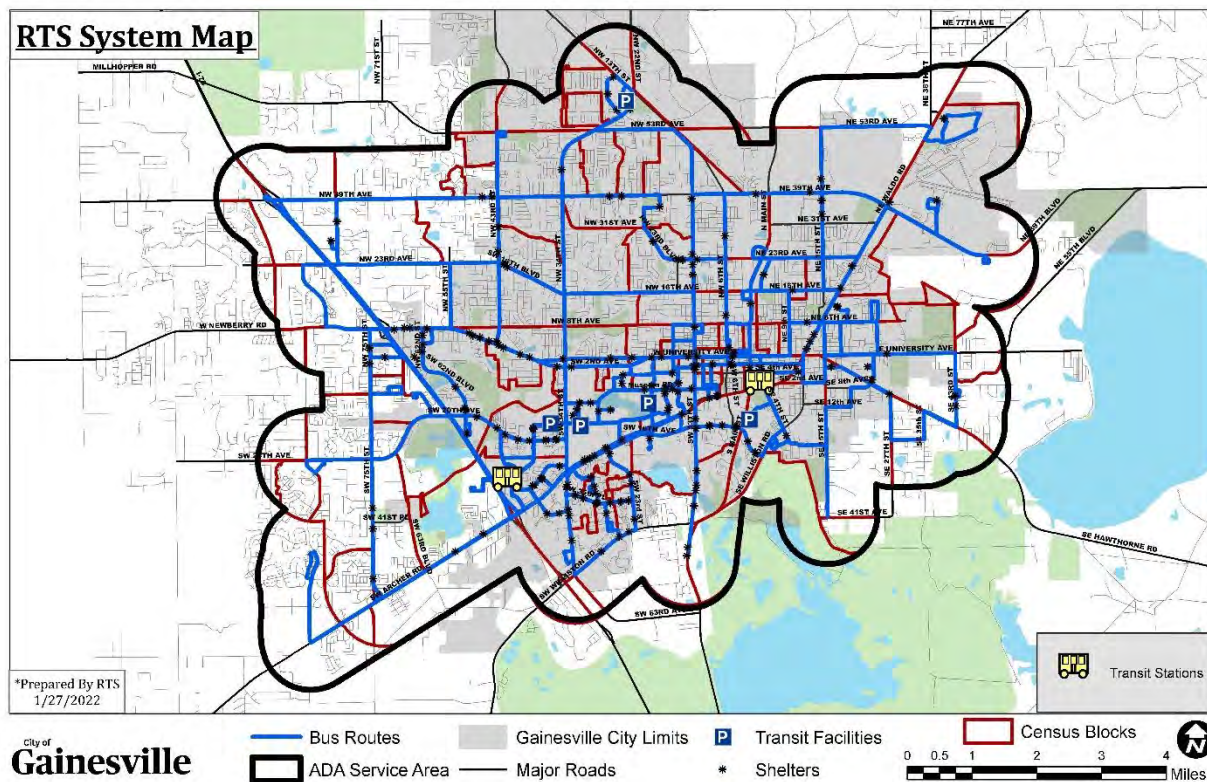
## VIII. SERVICE STANDARDS

Service Standards include Vehicle load, On-time performance, Service availability and Vehicle Headway; and, Service Policies will focus on Transit amenities, and Vehicle assignment

RTS is required to plan and deliver transportation services in an equitable manner. This means that the distribution of service levels and quality is to be equitable between minority and low-income populations and, the overall population. RTS has reviewed its services and policies to ensure that those services and benefits are provided in an equitable manner to all persons.

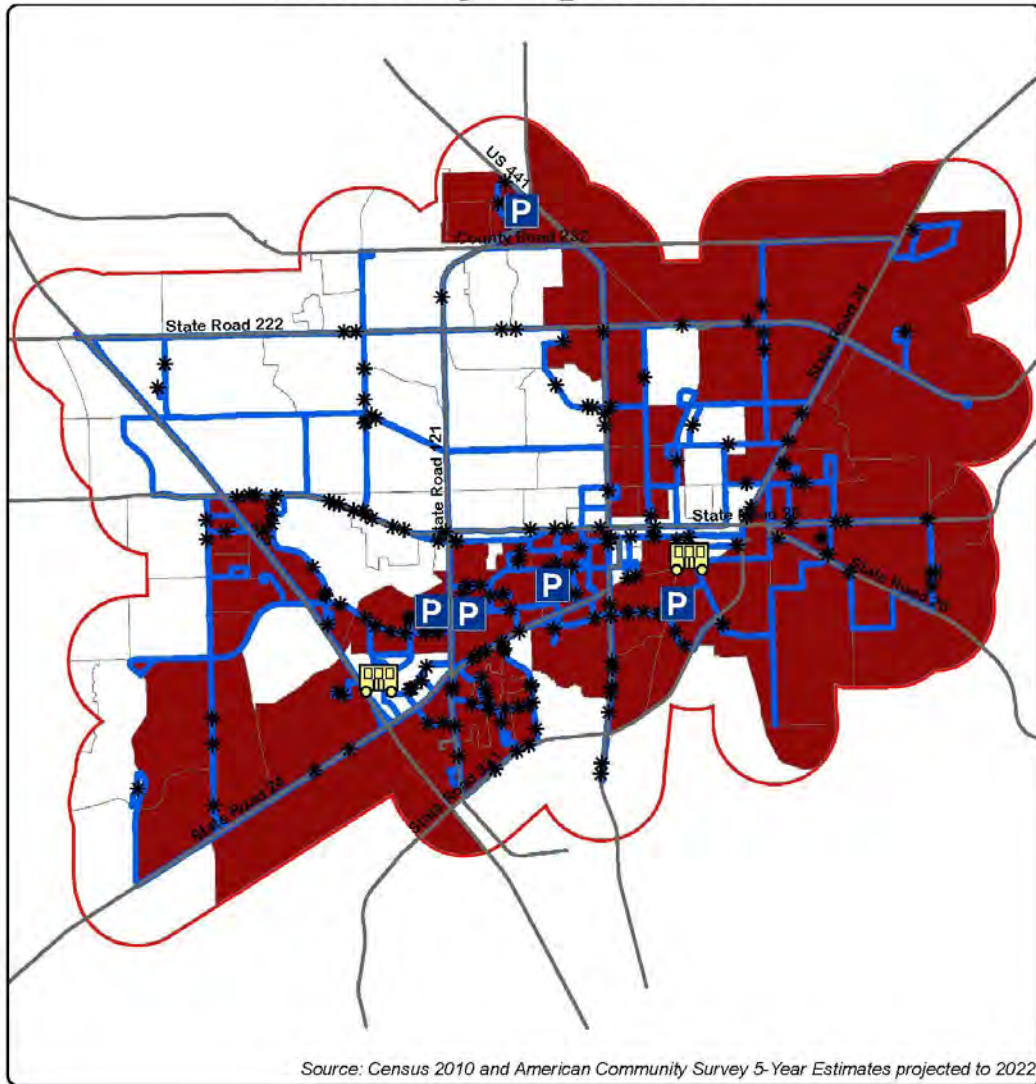
### Existing Service Standards

The agency has set standards and policies that address how services are distributed across the transit system service area to ensure that the distribution affords users equitable access to these services. As shown in the following maps, the agency’s routes appear to serve low income and minority areas. The first map is the system map and it shows the entire alignment or route system. Subsequent maps show the same route system map but with low income and minority populations superimposed on the route or system map. Looking at RTS bus routes shown in the RTS System Map, and comparing the services provided in major LEP, minority and low income areas to those provided in other parts of the service area, it is certainly acceptable to say that RTS routing system are equitable and provide good coverage in all areas with the highest concentration of minority and low income transit users. RTS regularly keeps an eye on providing and maintaining adequate services for customers. Notice the spatial distribution (last map) of Low Income and Minority Households vis-à-vis RTS system bus routes.













# Minority Population




Source: Census 2010 and American Community Survey 5-Year Estimates projected to 2022

\*Created Using TBEST Software

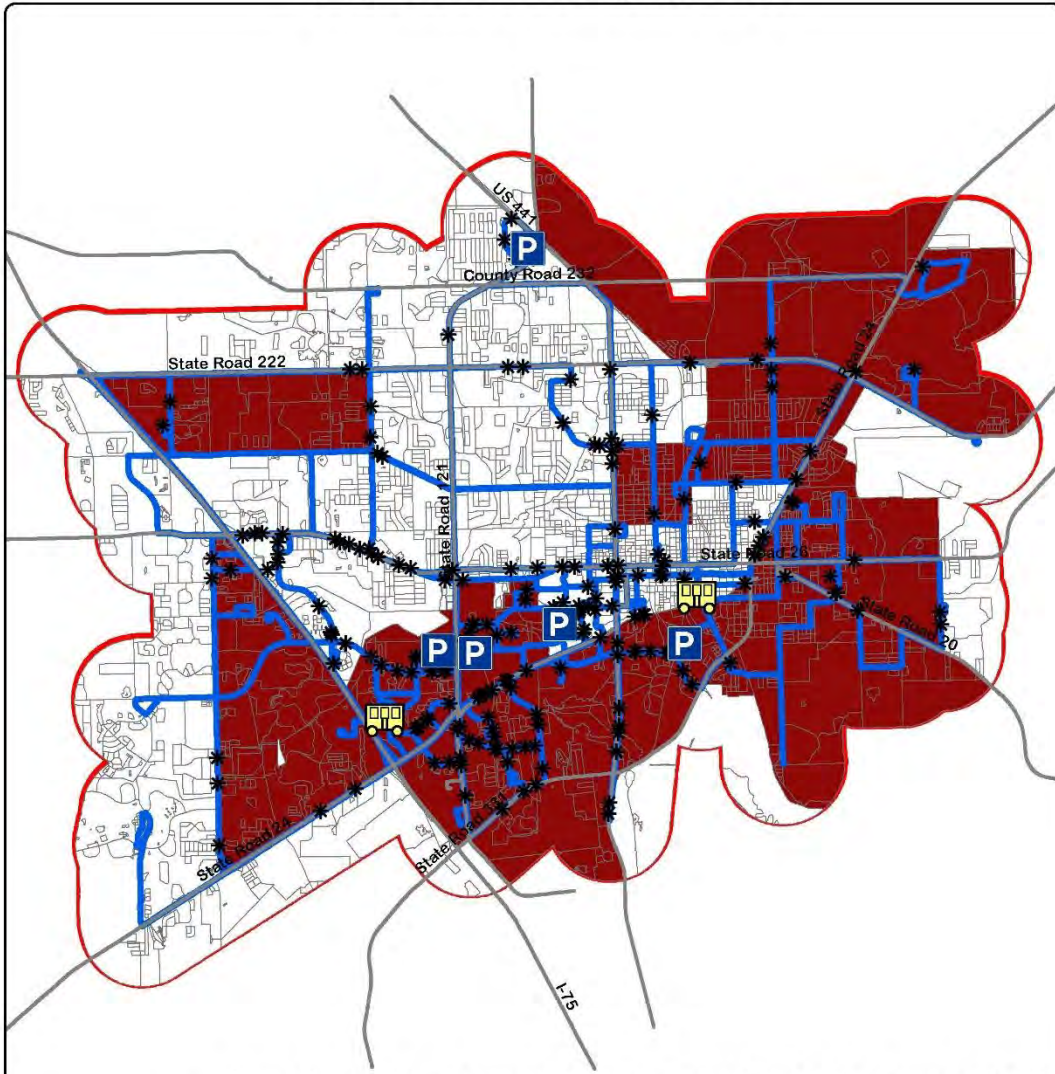
 Transit Facilities	 Transit Stations
 Shelters	
 Major Roads	
 RTS Bus Routes	
 RTS Service Area	
<b>Minority Population</b>	
<b>Population Percentage</b>	
 Less Than or equal to the system average of 34.56%	
 Greater than the System Average of 34.56%	

**City of Gainesville**

0 0.5 1 2 3 4 Miles



## No Vehicle Available



Source: Census 2010 and American Community Survey 5-Year Estimates projected to 2022

*\*Created using TBEST Software*

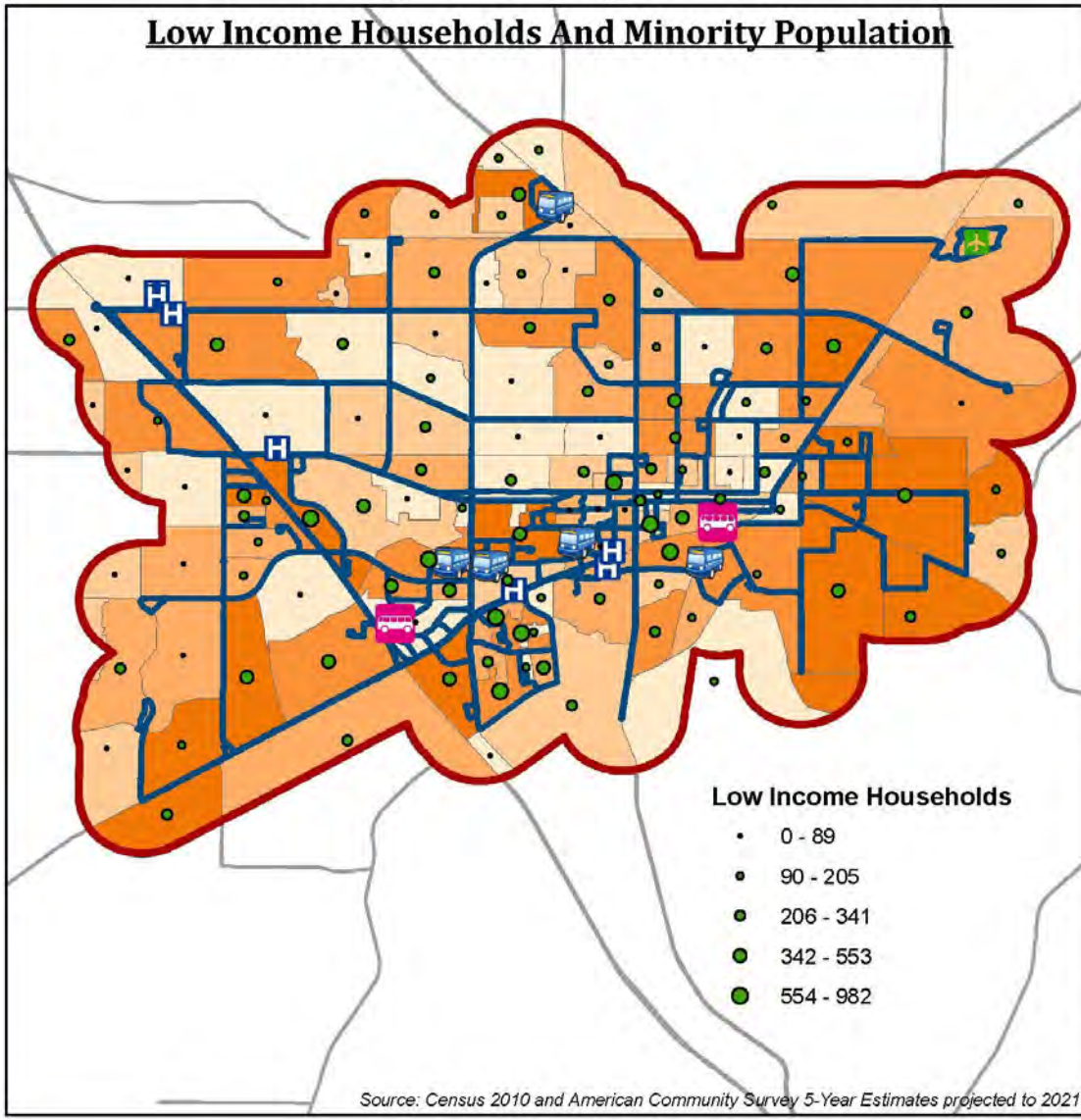
<b>P</b>	Transit Facilities	<b>No Vehicle Available</b>
*	Shelters	
	Transit Stations	<b>Zero Vehicle Households</b>
—	Major Roads	<span style="display: inline-block; width: 20px; height: 10px; border: 1px solid black; background-color: white;"></span> Less than or equal to the System Average of 7.05%
—	RTS Bus Routes	<span style="display: inline-block; width: 20px; height: 10px; background-color: red;"></span> Greater than the System Average of 7.05%
<span style="border: 2px solid red; display: inline-block; width: 15px; height: 10px;"></span>	RTS Service Area	

City of  
Gainesville



# Map of Study Area

## Low Income Households And Minority Population



### Low Income Households

- 0 - 89
- 90 - 205
- 206 - 341
- 342 - 553
- 554 - 982

Source: Census 2010 and American Community Survey 5-Year Estimates projected to 2021

Bus Routes	<b>Minority Population</b>	Airport
Major Roads	39 - 292	Hospital
RTS Service Area	293 - 530	
Transit Facilities	531 - 873	
Transit Stations	874 - 1377	
	1378 - 2489	

City of **Gainesville**

0 0.00275 0.0055 0.011 Miles

In addition, the agency's demand response services are available to all callers on a first-come first serviced basis, without regard for race, color or national origin.

The following system-wide service policies, standards and procedures are used to guard against service design or operations decisions from having disparate impacts or disproportionate burden on relevant demographic groups. (For complete information on Service Standards, [See Appendix J](#)). All of RTS services are designed to meet the agency's established standards; thus, it is judged that services are provided equitably to all persons in the service area, regardless of race, color or national origin.

- **Vehicle load** - Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. The standard for maximum vehicle load is 1.12 to 1.25, and all of RTS services attempt to meet this standard. This could be challenging for University of Florida and Santa Fe College routes at the beginning of the semester as new students adjust to campus life and some students may still be evaluating whether or not they want to stay or abandon school. As the term progresses and student counts decline, vehicle load tends towards the lower end of the range.
- **Vehicle headway** - Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service. The standard for RTS vehicle headways is 20 - 60 minutes, and all of RTS services strive to meet this standard. Time points established along the routes and use of modern technology contribute to the achievement of the goal.
- **On-time performance** - On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time" by the individual agency. The standard for on-time service at RTS is +2 to -5 minutes, but not all of RTS services meet this standard. Recent results show that about 51-65% of all trips arrive on time, with 19-24% of buses being late.
- **Service availability** - Service availability (also known as span of service) is a general measure of the distribution of routes within a transit provider's service area. The standard for service availability at RTS is 6:00 AM to 11:00 PM, and all of RTS services meet this standard, (Agency Service Change Policy is included in [Appendix K](#))

### Service and Operating Policies

RTS service and operating policies also ensure that operational practices do not result in discrimination on the basis of race, color, or national origin.

- **Distribution and Siting of Transit Amenities** - Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. RTS has a policy to ensure the equitable distribution of transit amenities across the system. This policy applies to seating (i.e., benches, seats), bus shelters and canopies, the provision of information and Intelligent Transportation Systems (ITS), and waste receptacles (including trash and recycling). Passenger amenities are sited based on customer convenience, ridership demand, and vehicle speed. Closely spaced stops reduce walking distance but slow buses down, while stops spaced further apart increase walking distance but speed buses up. RTS' service standard for this measure is system-wide and pegged at six to eight stops per mile or every 660 to 880 feet. This interval will fluctuate depending on the presence or absence of trip generators and safety and accessibility concerns. Bus stops with less than five daily passengers over a year long period are typically reviewed for elimination and/or consolidation.

- Distribution and Siting of Fixed Facilities – RTS shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Facilities include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Facilities do not include bus shelters but transit stations and power substations, etc. are evaluated during project development of the NEPA process.
- Vehicle assignment refers to the process by which vehicles are placed on routes throughout the transit system. Assignment standards relate to vehicle age, which serves as proxy for condition and comfort. RTS uses a 12 year lifespan for all standard 40-foot buses and seeks to implement this standard within existing financial constraints to combat fuel economy and maintenance issues associated with older vehicles. RTS provides Automatic Vehicle Location (AVL) services to its patrons. Presently, the agency operates 99 -116 vehicles in peak service and in turn has equipped 144 buses with AVL equipment. Moreover, RTS utilizes APC (Automatic Passenger Count) technology to collect passenger information and 107 buses are equipped with these units. These buses are rotated to cover all system service attributes (weekday, weekend, Holiday, Reduced Service, short/long routes, span of service, rural/urban) to capture and reflect an accurate characteristics customers on all service routes.

RTS assigns vehicles to its fixed route bus system with the goal of providing equitable benefits to minority and low-income populations. Vehicles are assigned with regard to ridership demand patterns as routes with greater numbers of passengers need vehicles with larger capacities. For each type of assignment, newer vehicles are rotated to ensure that no single route or service always has the same vehicle. However, to ensure that low income, minority and LEP individuals benefit from new buses, RTS swapped out and assigned 10 out of the 14 new buses it acquired in FY21 to areas with the highest concentrations of these groups - a demonstration of the agency's commitment to serving the population. Also low-floor buses are deployed along routes with elderly and/or those in wheelchairs, or those who need help to board the bus. RTS Title VI Manager routinely reviews vehicle assignments to ensure that vehicles are indeed being rotated and that no single route or service always has the old or new vehicles and also meet other assignment criteria.

### Fare and Service Changes

RTS follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, RTS considers the relative impacts on, and benefits to, minority and low-income populations, including LEP populations. All planning efforts for changes to existing service or fares, as well as new services, have a goal of providing equitable service, (See [Appendix L](#) for Fare Equity Analysis). RTS did not change its fares during this reporting period.



## **IX. APPENDICES**

**Appendix A**  
**City of Gainesville Equal**  
**Opportunity Complaint Policy**



Equal Opportunity Policies

Number EO-8

## Equal Opportunity Complaint Policy

The City is committed to maintaining a workplace free of discrimination, harassment, and inappropriate behavior on the basis of race, color, gender, age, religion, national origin, marital status, sexual orientation, disability, or gender identity (protected characteristics). The City is responsible for ensuring that all actions dealing with personnel and employment practices will be in accordance with equal employment laws, policies, and procedures and that services, programs and activities will be in accordance with applicable laws, policies, and procedures.

Employees and applicants for employment and citizens utilizing City services will be given the opportunity to voice complaints of discrimination, harassment, or inappropriate behavior. Such complaints will be given prompt and full consideration and every effort will be made to resolve them rapidly. Employees, applicants, or citizens registering complaints of discrimination, harassment or inappropriate behavior will be free from reprisal, harassment, intimidation, or retaliation. The receipt, investigation and resolution of complaints shall be in accordance with equal opportunity laws, policies, and procedures. The Equal Opportunity Department Director shall develop procedures for investigation of complaints.

An employee, applicant, or other individual maintains the right to file a complaint with an outside agency or to use existing collective bargaining procedures, as applicable, at any stage in the complaint process.

In carrying out the City's formal or informal Equal Opportunity Complaint investigations, all information either received, solicited, or compiled during the course of said investigation, whether in written, oral, or other form, will be protected and remain strictly confidential to the extent allowed by Florida law. All City employees are required to cooperate fully with the Equal Opportunity Department during any formal or informal investigation.

Equal Opportunity Complaint

Number EO-8

Formal Complaints:

1. The affected employee or citizen will complete a "Complaint of Discrimination" form in the Equal Opportunity Department within one hundred-eighty (180) days of the employee's or citizen's knowledge of the alleged act of Discrimination.
2. The Charter Officer or designee will have ten (10) working days from receipt of the complaint and request in which to provide information and/or documents requested by the Equal Opportunity Department Director. Any additional requests for information and/or documents should be completed within the timeframe specified by the Equal Opportunity Department Director. The response deadlines may be extended by the Equal Opportunity Department Director.
3. The Equal Opportunity Department Director or designee, may work alone or in conjunction with other investigator (s) selected by the Equal Opportunity Department Director to conduct a formal investigation of the alleged charges, which may include an informal hearing of persons involved, and on-site interviews of other employees who may have witnessed the alleged discriminatory act(s). If other investigators are used, they will work under the direction and supervision of the Equal Opportunity Department Director or designee and all investigative plans, interviews, requests for information, work, and scope of work will be coordinated and approved through the Equal Opportunity Department Director or designee. All reports of the investigator(s) will be submitted to the Equal Opportunity Department Director or designee.
4. The complainant and the alleged discriminating party may give a list of witnesses to be interviewed by the Equal Opportunity Department Director or other investigator(s) in support or denial of the charge(s) of discrimination. Also, any documents related or pertinent to the allegation(s) should be submitted to the Equal Opportunity Department Director or designee.
5. Prior to completing the final written investigation report, the Equal Opportunity Department Director will meet with the Charter Officer or designee and will consult with the City Attorney's Office regarding the preliminary results of the investigation. The Charter Officer or designee will be allowed to present additional information.
6. Upon completion of the investigation, the Equal Opportunity Department Director will submit a written investigative report of findings directly to the Charter Officer. If the complaint makes personal and direct allegations against a Charter Officer, the written investigative report will be submitted to the City Commission by the Equal Opportunity Department Director and the City Auditor.
7. If the complaint is against an employee working under the Charter Officer, the respective Charter Officer will meet with the Equal Opportunity Department Director to discuss the complaint or report. The Charter Officer will issue a written response directly to the Equal Opportunity Department Director and the complainant within fifteen (15) working days after receipt of the Equal Opportunity Department

Equal Opportunity Complaint

Number EO-8

Director's written investigative report.

Investigation Coordination:

If the investigation will be conducted by external investigators, the Equal Opportunity Department Director shall prepare the necessary paperwork and develop any evaluative criteria to be used. The Equal Opportunity Department Director shall be responsible for selecting the investigator(s). The Equal Opportunity Department Director shall receive the report(s) of the investigator(s) and ensure that any contractual terms have been fulfilled. Funds for contracting with external investigators will be allocated in the Equal Opportunity Department's budget.

Informal Complaints:

Informal Complaints are complaints that have not been notarized. An employee/applicant or citizen who believes that he/she is the victim of discrimination may informally contact the Equal Opportunity Department Director or designee or a supervisor or manager. The Equal Opportunity Department Director or designee will attempt to resolve the issue or concern, if necessary.

Confidentiality of Negotiations for Resolution:

During formal negotiations for resolution of formal or informal complaints, offers and statements made by parties shall not be used by or against either party if resolution attempts fail. Parties involved in resolution attempts should be given the opportunity to explore reasonable avenues of relief.

Effective Date: 06/26/00

Revised: 03/28/08

Revised: 09/04/08

Revised: 08/18/16

# **APPENDIX B**

## **Public Notice in Other Languages**

## Title VI Notice to Public - Spanish Version



### 1. Título VI Aviso al Público del Sistema de Transito Regional de Gainesville

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

### 2. RTS Título VI Declaración

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

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

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

### 3. Realizando una Queja de Título VI

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

- **Internet:**

La Forma de Quejas de Título VI o el Procedimiento de Quejas de Título VI pueden ser encontrados en: <http://go-rt.com/feedback-page/#titlevi>



- **Dirección de correo:**

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

- **Teléfono:**

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

- **Email:**

Para mandar un email a la Oficina de Igualdad de Oportunidades para pedir una Forma de Quejas de Título VI, envíe su mensaje a [equalopportunity@cityofgainesville.org](mailto:equalopportunity@cityofgainesville.org).

### **Cómo presentar una queja de Título VI**

Se pueden presentar quejas por discriminación por motivos de raza, color, origen nacional o idioma. Cualquier queja de este tipo deberá presentarse por escrito a más tardar 180 días después de la fecha en que la persona cree que ocurrió la discriminación. Las quejas por escrito se presentarán a la Oficina de Igualdad de Oportunidades de la Ciudad de Gainesville.

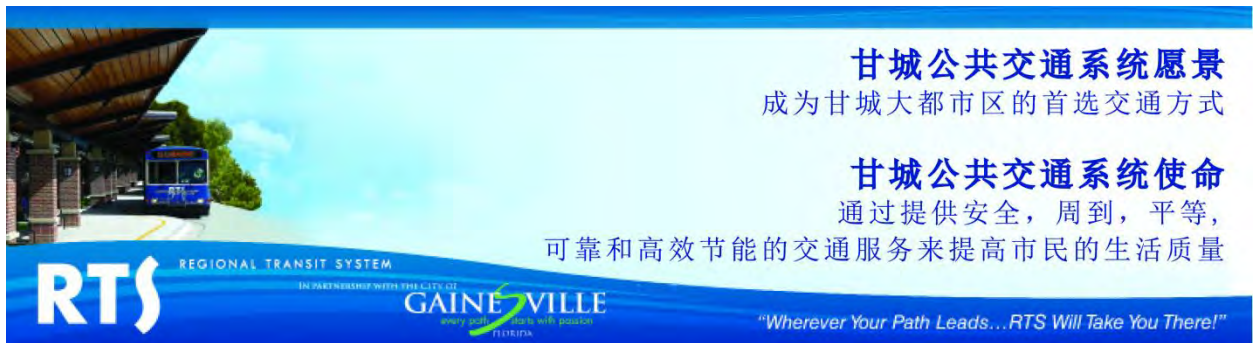
Todas las llamadas telefónicas, visitas o correos electrónicos con respecto a una queja del Título VI se dirigirán a la Oficina de Igualdad de Oportunidades de la Ciudad de Gainesville. La persona que desee presentar una queja debe completar y firmar un Formulario de queja del Título VI y devolverlo por correo a la dirección que figura en el formulario o dejarlo en la Oficina de Igualdad de Oportunidades del Ayuntamiento. El Formulario de queja del Título VI se puede recoger en la dirección del Edificio de la Biblioteca anterior a continuación o descargarse del sitio web de RTS en: <http://www.go-rt.com/feedback.php#titlevi>.

Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja ante:

Oficina de Derechos Civiles, Atención: Coordinador del Programa del Título VI, Edificio Este, 5to Piso-TCR,  
1200 New Jersey Ave., SE, Washington, DC 20590



## Title VI Notice to Public - Chinese Version



### 1 甘城公共交通系统(RTS)关于民权法案第六章对公众的通告

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

### 2 RTS民权法案第六章

1964年民权法案声明：

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

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

### 3 针对民权法案第六章进行投诉

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

- **网络下载地址:**

<http://go-rtts.com/feedback-page/#titlevi>

- **邮寄联系方式：**

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

- 电话联系方式：

(352) 334-5051

- 电子邮件 (email) 联系方式：

[equalopportunity@cityofgainesville.org](mailto:equalopportunity@cityofgainesville.org)

### 如何提交標題VI投訴

投訴可以根據種族，膚色，國籍或語言提交歧視。任何此類投訴應在該人認為發生歧視之日起180天內以書面形式提交。書面投訴應提交給平等機會辦公室蓋恩斯維爾市。

有關TitleVI投訴的所有電話，步行或電子郵件均應發送至蓋恩斯維爾市平等機會辦公室。希望提出投訴的人必須填寫並簽署標題VI投訴表，並通過郵件將其寄回表格上的地址，或將表格放在市政廳平等機會辦公室。標題VI投訴表可以在下面的舊圖書館大樓地址領取，也可以從RTS網站下載：<http://www.go-rts.com/feedback.php#titlevi>。

投訴人可以通過以下方式直接向聯邦運輸管理局投訴：

公民權利辦公室，注意：東區五樓TCR第六章計劃協調員，

新澤西州新澤西州大街1200號，華盛頓特區20590

# **Appendix C**

## **Letter of Non-Sub Recipient to FTA**



Regional Transit System  
PO Box 490, Station 5  
Gainesville, FL 32627-0490  
(352) 334-2609  
(352) 334-3681 (fax)  
[www.go-rts.com](http://www.go-rts.com)

August 16, 2021

Michele Foster, Regional Civil Rights Officer  
FTA Region IV – Atlanta  
230 Peachtree Street, NW, Suite 1400  
Atlanta, GA 30303

Dear Ms. Foster:

Re: RTS and Sub-recipients

RTS does not have any sub-recipients to provide monitoring and assistance. Therefore, in the future, if RTS has sub-recipients, we will provide assistance and monitoring in areas as required by FTA Circular Letter 4702.1B.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jesus Gomez".

Jesus Gomez, Transit Director  
Regional Transit System  
Email: [gomezjm@cityofgainesville.org](mailto:gomezjm@cityofgainesville.org)

OUR VISION: *The City of Gainesville will set the standard of excellence for a top ten mid-sized American city; recognized nationally as an innovative provider of high-quality, cost-effective services.*

# **Appendix D**

# **Complaint Form**



### Title VI Complaint Form

RTS se compromete a garantizar que ninguna persona es excluida de la participación en o negada los beneficios de sus servicios sobre la base de raza, color u origen nacional, conforme a lo dispuesto por el título VI de la ley de derechos civiles de 1964, enmendada. Quejas de título VI deben ser presentadas dentro de 180 días desde la fecha de la supuesta discriminación

Nota: La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, por favor llame la oficina de igualdad de oportunidades al (352) 334-5051. Llenar y devolver este formulario a la ciudad de Gainesville oficina de igualdad de oportunidades: 222 E. University Avenue, Gainesville, FL 32602.

- 1.-Nombre del que pone la queja \_\_\_\_\_
  2. Dirección \_\_\_\_\_
  3. Ciudad, Estado y Zona Postal \_\_\_\_\_
  4. Número de Teléfono ( Del hogar) \_\_\_\_\_ (Del trabajo) \_\_\_\_\_
  5. Persona discriminada (si es alguien que no es el que pone esta queja)  
 Nombre \_\_\_\_\_  
 Dirección \_\_\_\_\_  
 Ciudad, Estado y Zona Posatal \_\_\_\_\_
  6. Cuál, cree usted, de los siguientes incisos describe la razón de la discriminación que tuvo lugar? Esta fue debido a:
    - a. Raza \_\_\_\_\_
    - b. Color \_\_\_\_\_
    - c. Nacionalidad de origen (idioma inglés no competente) \_\_\_\_\_
  7. En que fecha su alegato de discriminación tiene lugar? \_\_\_\_\_
  8. En sus propias palabras, describir la discriminación alegada. Explicar lo que sucedió y que crees era responsable. Utilice la parte posterior de esta forma si se requiere espacio adicional.
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

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**9. Ha presentado esta queja con cualquier otro nivel federal, estatal o agencia local; ¿o con cualquier tribunal federal o estatal?  Sí  No**

**De responder si, marque todos en los que se relaciona su queja anterior:**

Agencia Federal  Corte Federal  Agencia Estatal  Corte Estatal  
 Agencia local.

**10. Sírvanse facilitar información sobre una persona de contacto en la Agencia/tribunal donde se presentó la queja**

**Nombre** \_\_\_\_\_

**Dirección** \_\_\_\_\_

**Ciudad, Estado y Zona Postal** \_\_\_\_\_

**Número del Teléfono** \_\_\_\_\_

**11. Por favor firme abajo. Usted puede adjuntar cualquier material escrito u otra información que crees que es relevante para su queja**

\_\_\_\_\_  
**Firma del que pone la queja** **Fecha**

**Escriba con letra del molde el nombre del que pone la queja**

Fecha de recibida: \_\_\_\_\_

Recibida por: \_\_\_\_\_



## 条例六投诉表

根据1964年公民权利法修订案第六条规定，不论种族，肤色和国籍，区域公交系统将致力于保护所有人参与和享有服务的权利不被损害。条例六投诉必须在歧视声明日之后的180天内被受理。

备注：以下必要信息将有助于我们处理您的投诉。如果您需要任何帮助来完成这个表格，请拨打市平等权益保障办公室电话(352) 334-5051。请将完成的表格提交到市平等权益保障办公室。地址：222 E. University Avenue, Gainesville, FL 32602.

1. 投诉人： \_\_\_\_\_

2. 地址： \_\_\_\_\_

3. 城市、州、邮编： \_\_\_\_\_

4. 家庭电话： \_\_\_\_\_ 办公室电话： \_\_\_\_\_

5. 被歧视人信息（如果非投诉者本人）

姓名： \_\_\_\_\_

地址： \_\_\_\_\_

城市、州、邮编： \_\_\_\_\_

6. 以下哪项最能描述您受到歧视的原因？理由为：

a. 种族 \_\_\_\_\_

b. 肤色 \_\_\_\_\_

b. 国籍（有限的英语表达能力） \_\_\_\_\_

7. 歧视发生时间 \_\_\_\_\_



8. 请您描述该歧视事件，包括事件发生经过以及事件责任人。如果此页面不够，请继续填写在表格背面。

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9. 您是否在其它联邦、州立、或本地机构，或其它联邦、州立法院填写过此表格？

是  否

如果是，请勾选所有符合的选项：

联邦机构  联邦法院  州立机构  州立法院

本地机构

10. 请提供所在投诉受理机构/法院的联系人信息。

姓名： \_\_\_\_\_

地址： \_\_\_\_\_

城市、州、邮编： \_\_\_\_\_

电话： \_\_\_\_\_

11. 投诉人签名。您可以附带任何您觉得与此投诉案件相关的手写文件和信息。

\_\_\_\_\_  
投诉人签名

\_\_\_\_\_  
日期

\_\_\_\_\_  
投诉人姓名

受理日期： \_\_\_\_\_

受理人： \_\_\_\_\_

# **Appendix E**

## **Complaint Form (English)**

**RTS  
Title VI Complaint Form**

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

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

1. Complainant's Name \_\_\_\_\_

2. Address \_\_\_\_\_

3. City, State and Zip Code \_\_\_\_\_

4. Telephone Number (home) \_\_\_\_\_ (business) \_\_\_\_\_

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

Name \_\_\_\_\_

Address \_\_\_\_\_

City, State and Zip Code \_\_\_\_\_

6. Which of the following best describes the reason you believe the discrimination took place?

Was it because of your:

a. Race \_\_\_\_\_

b. Color \_\_\_\_\_

b. National Origin (Limited English Proficiency) \_\_\_\_\_

7. What date did the alleged discrimination take place? \_\_\_\_\_

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

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, check all that apply:

\_\_\_\_\_ Federal agency \_\_\_\_\_ Federal court \_\_\_\_\_ State agency \_\_\_\_\_ State court  
\_\_\_\_\_ Local agency

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

Name \_\_\_\_\_

Address \_\_\_\_\_

City, State, and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

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

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print or Type Name of Complainant

Date Received: \_\_\_\_\_

Received By: \_\_\_\_\_

# **Appendix F**

## **Complaint Status**

## COMBINED TITLE VI, ADA, EEO COMPLAINT STATUS REPORT

### Internal RTS Complaints: FY 18 - FY 22

Case #	Status	Date Filed	Disposition	Basis
EO-I-2020-46	Under review -Legal	9/15/2020	Pending	Gender/Age
EO-I-2018-01	Under review - CM*	11/1/2017	Pending	Race/Gender
EO-I-2018-01(b)	Under review - CM	11/1/2017	Pending	Race/Gender
EO-I-2021-06	Under review - CM	12/9/2020	Pending	Disability
EO-I-2022-12	New case - awaiting Position Statement	1/13/2022	Pending	Race/Gender
EO-E-2020-10	New case - awaiting Position Statement	12/20/2021	Pending	Race/Color

\*CM = City Manager

# **APPENDIX G**

## **Compliance Review**



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IV

Alabama, Florida, Georgia,  
Kentucky, Mississippi, North  
Carolina, Puerto Rico, South  
Carolina, Tennessee, Virgin  
Islands

230 Peachtree St., N.W.,  
Suite 1400  
Atlanta, GA 30303  
404-865-5600  
404-865-5605 (fax)

August 10, 2021

Mr. Jesus Gomez  
Transit Director  
City of Gainesville Regional Transit System (RTS)  
P.O. Box 490, Mail Station #5  
Gainesville, FL 32627-0490

**Re: Federal Transit Administration (FTA) Fiscal Year 2021 Triennial Review – Draft Report**

Dear Mr. Gomez:

I am pleased to provide you with a copy of this FTA report as required by 49 U.S.C. Chapter 53 and other Federal requirements. The enclosed draft report documents the FTA's Triennial Review of RTS in Gainesville, FL. Although not an audit, the Triennial Review is the FTA's assessment of RTS's compliance with Federal requirements, determined by examining a sample of award management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with award requirements.

The Triennial Review focused on RTS's compliance in 21 areas. No deficiencies were found with the FTA requirements in 18 areas. Deficiencies were found in three areas: Financial Management and Capacity, Satisfactory Continuing Control, and Equal Employment Opportunity. RTS had no repeat deficiencies from the 2017 Triennial Review.

Given the delay in completing the FY 2020 reviews until FY 2021 and the significant amount of additional Federal financial support provided through CARES Act, FTA developed a supplement to the FY2020 Contractors' Manual to assist in the evaluation of how recipients have used CARES Act and Emergency Relief funding. This supplement details the specific flexibilities and administrative relief provided by FTA for the use of these funds.

Please review this draft report for accuracy and provide your comments to both the reviewer and your FTA Program Manager **within ten business days from the date of this letter**. A final report that incorporates your comments to the draft report will be provided to you within 14



Mr. Gomez  
Page 2 of 2

business days of your response.

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Mr. Chris White, Program Manager, at 404-865-5619 or by email at [christopher.white@dot.gov](mailto:christopher.white@dot.gov), or Ms. Patti Monahan, your reviewer, at 617-291-8431 or by email at [patti.monahan@monahanmobility.com](mailto:patti.monahan@monahanmobility.com).

Sincerely,



Robert Buckley, AICP  
Director, Office of Financial Management and Program Oversight

Enclosure

cc: Christopher White, Program Manager  
D. Michele Foster, Regional Civil Rights Officer  
Dwight Hill, FTA Procurement Specialist  
Patti Monahan, IEI Reviewer

**DRAFT REPORT**

**FISCAL YEAR 2021  
TRIENNIAL REVIEW**

**of**

**City of Gainesville RTS  
RTS  
Gainesville, FL  
ID: 1084**

*Performed for:*

**U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL TRANSIT ADMINISTRATION  
REGION IV**

*Prepared By:*

**Interactive Elements Inc.**

**Scoping Meeting Date: February 27, 2020**

**Virtual Site Visit Date: July 13-14, 2021**

**Draft Report Date: August 10, 2021**

## Table of Contents

I. Executive Summary .....	1
II. Review Background and Process .....	2
1. Background.....	2
2. Process .....	2
3. Metrics.....	3
III. Recipient Description.....	4
1. Organization .....	4
2. Award and Project Activity.....	4
IV. Results of the Review .....	6
1. Legal .....	6
2. Financial Management and Capacity .....	6
3. Technical Capacity – Award Management .....	7
4. Technical Capacity – Program Management & Subrecipient Oversight.....	7
5. Technical Capacity – Project Management.....	7
6. Transit Asset Management.....	7
7. Satisfactory Continuing Control.....	7
8. Maintenance.....	8
9. Procurement.....	8
10. Disadvantaged Business Enterprise (DBE).....	9
11. Title VI.....	9
12. Americans with Disabilities Act (ADA) – General.....	10
13. ADA – Complementary Paratransit.....	10
14. Equal Employment Opportunity.....	10
15. School Bus.....	11
16. Charter Bus .....	11
17. Drug Free Workplace Act.....	11
18. Drug and Alcohol Program .....	11
19. Section 5307 Program Requirements.....	11
20. Section 5310 Program Requirements .....	12

21. Section 5311 Program Requirements .....	12
V. Summary of Findings.....	13
VI. Attendees.....	15
VII. Appendices .....	16

## I. Executive Summary

This report documents the Federal Transit Administration's (FTA) Triennial Review of the City of Gainesville Regional Transit System (RTS) of Gainesville, FL. FTA wants to ensure that awards are administered in accordance with the requirements of Federal public transportation law 49 U.S.C. Chapter 53. The review was performed by Interactive Elements Inc. During the virtual site visit, administrative and statutory requirements were discussed and documents were reviewed.

The Triennial Review focused on RTS's compliance in 21 areas.

Deficiencies were found in the areas listed below.

Review Area	Deficiencies	
	Code	Description
Financial Management and Capacity (FM)	F4-1	ECHO documentation deficient
Satisfactory Continuing Control (SCC)	SCC8-3	Insufficient equipment records
Equal Employment Opportunity (EEO)	EEO1-3	Revisions to EEO program not made

## II. Review Background and Process

### 1. Background

The United States Code, Chapter 53 of Title 49 (49 U.S.C. 5307(f)(2)) requires that “At least once every 3 years, the Secretary shall review and evaluate completely the performance of a recipient in carrying out the recipient’s program, specifically referring to compliance with statutory and administrative requirements...” This Triennial Review was performed in accordance with FTA procedures (published in FTA Order 9010.1B, April 5, 1993).

The Triennial Review includes a review of the recipient’s compliance in 21 areas. The basic requirements for each of these areas are summarized in Section IV.

This report presents the findings from the Triennial Review of RTS. The review concentrated on procedures and practices employed during the past three years; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of award funds. The specific documents reviewed and referenced in this report are available at the FTA’s regional office or the recipient’s office.

### 2. Process

The Triennial Review process includes a pre-review assessment and scoping meeting with the FTA regional office, and a virtual site visit (to the recipient’s location). The review scoping meeting was conducted with the Region IV Office on February 27, 2020. Necessary files retained by the regional office were sent to the reviewer(s) electronically. A recipient information request was sent to RTS on November 1, 2019, indicating a review would be conducted during Fiscal Year 2020. In March 2020, all work on Reviews was halted due to the Public Health Emergency. A subsequent recipient information request was sent to RTS on January 8, 2021, advising it that a virtual site visit would be taking place and indicating additional information that would be needed and issues that would be discussed. The virtual site visit to RTS occurred on July 13-14, 2021.

The virtual site visit portion of the review began with an entrance conference, at which the purpose of the Triennial Review and the review process were discussed. The remaining time was spent discussing administrative and statutory requirements and reviewing documents. In addition, the reviewers evaluated how RTS has used CARES Act and ER funding and the impacts of COVID-19 Public Health Emergency on the agency by discussing a series of questions included in the supplement to the FFY 2020 Contractors’ Manual. Additional documentation was requested for the Financial Management and Capacity and Procurement areas only. The reviewer examined ECHO drawdown documentation, sample procurement history files and a sample of maintenance records for FTA-funded vehicles and equipment.

Upon completion of the review, FTA and the reviewer provided a summary of preliminary findings to RTS at an exit conference. Section VI of this report lists the individuals participating in the review.

### 3. Metrics

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are:

- *Not Deficient*: An area is considered not deficient if, during the review, nothing came to light that would indicate the requirements within the area reviewed were not met.
- *Deficient*: An area is considered deficient if any of the requirements within the area reviewed were not met.
- *Not Applicable*: An area can be deemed not applicable if, after an initial assessment, the recipient does not conduct activities for which the requirements of the respective area would be applicable.



### III. Recipient Description

#### 1. Organization

The City of Gainesville, through the Regional Transit System (RTS), provides transit service within Gainesville and Alachua County. It serves an estimated population of 187,781 persons. The RTS is organizationally structured within the City of Gainesville's Department of Transportation and Mobility. The City Commission is the policy-making body for the RTS and is advised by a seven-member RTS Citizens Advisory Board. The RTS directly operates the fixed route service and contracts with a private operator for ADA complementary paratransit service. Under rules established by the State of Florida Transportation Disadvantaged Commission, a Community Transportation Coordinator (CTC) provides paratransit operations in the community. MV Transportation, Inc. is the current contractor operating the paratransit service in the Gainesville area.

The RTS directly operates a network of 52 fixed routes, and MV Transportation provides complementary door-to-door paratransit services along the routes within the service area. Individuals certified to ride the paratransit service can ride the fixed route service for free with a valid ADA eligibility card.

Transit service is provided Monday through Friday from 5:27 a.m. to 2:47 a.m., from 5:30 a.m. to 2:00 a.m. on Saturday, and from 7:00 a.m. to 5:47 p.m. on Sunday. The complementary paratransit service is provided Monday through Friday from 5:30 a.m. to 9:00 p.m., from 6:00 a.m. to 7:00 p.m. on Saturday, and from 9:00 a.m. to 6:00 p.m. on Sunday.

The basic adult fare for bus service is \$1.50 per one-way trip. A reduced fare of \$0.75 is available to senior citizens 65 years and older, students (Grade K-12 and college students), Medicaid and Medicare cardholders, veterans, active-duty military, and persons with disabilities during all hours of fixed route service. Children shorter than 40 inches, and accompanied by an adult, ride the fixed route for free. The fare for ADA paratransit service is \$3.00 per one-way trip.

RTS operates a fleet of 135 buses for fixed-route service. Its bus fleet consists of standard 35-foot and 40-foot low floor Gillig transit coaches, and five hybrid Gillig buses. The current peak requirement is for 116 vehicles. RTS also has a fleet of 18 vans and cutaways that it provides to MV Transportation to operate paratransit services.

RTS operates from a single maintenance, operations, and administration facility located at 34 SE 13th Road in Gainesville. Its service is oriented around the Rosa Parks Downtown Transfer Station located at 700 SE 3rd Street in Gainesville, and the Butler Plaza Transfer Station located at 4231 SW 30th Avenue.

#### 2. Award and Project Activity

Below is a list of RTS's open awards at the time of the review.



Award Number	Award Amount	Year Executed	Description
FL-2018-094-00	\$6,464,349	2018	5307 operating assistance, diesel bus replacements, preventive maintenance, bus shelters, equipment, and support vehicles
FL-2020-030-00	\$13,126,429	2020	CARES Act operating assistance, fuel, preventive maintenance, diesel buses, PPE, ADP equipment for buses
FL-2021-012-00	\$1,205,620	2021	5339 Low-No Emission vehicle (1 electric bus), charging station modifications, third-party bus line inspections, project management Center for Transportation and the Environment
FL-2018-032-00	\$767,146	2018	5307 diesel bus replacement, 2 vans, radios and equipment
FL-2019-089-00	\$1,000,000	2019	5339 Low-No Emission Vehicle (1 electric bus), charging station modifications, third-party bus line inspections, project management Center for Transportation and the Environment
FL-2018-009-00	\$6,371,793	2018	5307 electric bus, operating assistance, preventive maintenance, bus shelters, equipment, support vehicles; ADA paratransit service
FL-2020-110-00	\$673,791	2020	5339 rolling stock, infrastructure and equipment for electric bus fleet
FL-2020-108-00	\$5,284,538	2020	5307 operating assistance, 3 diesel buses, surveillance and security equipment, preventive maintenance, ADP software and hardware; ADA paratransit service
FL-2020-005-00	\$369,259	2020	5339 Infrastructure and equipment for electric bus fleet, APCs, maintenance equipment
FL-2019-091-00	\$5,667,796	2019	5307 operating assistance, preventive maintenance, diesel bus replacements, surveillance/security equipment, passenger amenities, support vehicles, computer and other equipment; ADA paratransit service
FL-2018-073-00	\$290,333	2018	5339 2 expansion paratransit vehicles, APCs and AVL equipment, radios
FL-2018-041-00	\$1,400,000	2018	Low or No Emission Vehicle (1 electric bus), charging equipment

### Projects Completed

In the past few years, RTS completed the following noteworthy project:

- Giro/Hastus project acquiring and implementing fixed route scheduling software. While RTS continues to work with the vendor on the software for additional modules, the initial major project was completed using funds from FL-90-X889.

### Ongoing Projects

RTS is currently implementing the following noteworthy projects:

- CAD/AVL project – this will give RTS the opportunity to replace obsolete AVL equipment as well as give capability for Wi-Fi in all buses.
- Farebox upgrades – RTS is working with University of Florida to identify funding sources to enable farebox improvements that will allow students to use electronic/digital passes.

### Future Projects

RTS plans to pursue the following noteworthy projects in the next three to five years:

- FTA-funded projects for the upcoming 3-5 years include continuing to apply for capital grants for new transfer stations, technology improvements and passenger amenities.

## IV. Results of the Review

### 1. Legal

**Basic Requirement:** The recipient must promptly notify the FTA of legal matters, include clauses in its third party and subrecipient agreements, and additionally notify the U.S. DOT Office of Inspector General (OIG) of any instances relating to false claims under the False Claims Act or fraud. Recipients must comply with restrictions on lobbying requirements.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Legal.

### 2. Financial Management and Capacity

**Basic Requirement:** The recipient must have financial policies and procedures; an organizational structure that defines, assigns and delegates authority; and financial management systems in place to match, manage, and charge only allowable cost to the award. The recipient must conduct required single audits and provide financial oversight of subrecipients.

**Finding:** During this Triennial Review of RTS, one deficiency was found with the FTA requirements for Financial Management and Capacity. For three of the nine ECHO draws that were examined as part of the review, supporting source documents, such as invoices, for underlying transactions were incomplete.

DEFICIENCY CODE F4-1: ECHO documentation deficient

**Corrective Action(s) and Schedule:** Gainesville must submit to the FTA regional office procedures for documenting ECHO draws, and documentation of training conducted of the appropriate staff on new policies and procedures.

### 3. Technical Capacity – Award Management

**Basic Requirement:** The recipient must report progress of projects in awards to the FTA timely.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Technical Capacity – Award Management.

### 4. Technical Capacity – Program Management & Subrecipient Oversight

**Basic Requirement:** The recipient must follow the public involvement process for transportation plans; develop and submit a State Management/Program Management Plan to the FTA for approval; report in the Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) on subawards; and ensure subrecipients comply with the terms of the award.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Technical Capacity – Program Management & Subrecipient Oversight.

### 5. Technical Capacity – Project Management

**Basic Requirement:** The recipient must be able to implement FTA-funded projects in accordance with the award application, FTA Master Agreement, and all applicable laws and regulations, using sound management practices; and prepare force account plans.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Technical Capacity – Project Management.

### 6. Transit Asset Management

**Basic Requirement:** Recipients must comply with 49 CFR Part 625 to ensure public transportation providers develop and implement transit asset management (TAM) plans.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Transit Asset Management.

### 7. Satisfactory Continuing Control

**Basic Requirement:** The recipient must ensure that FTA-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.

**Finding:** During this Triennial Review of RTS, one deficiency was found with the FTA requirements for Satisfactory and Continuing Control. Equipment management requirements for non-state recipients include maintaining equipment records that contain certain required information. Some of the required elements are tracked in the annual inventory of all city-owned assets conducted by the city's Finance Department; others are included in detailed vehicle records maintained by RTS. While equipment records may be kept in more than one location, several required items are not currently tracked in either system.

**Corrective Action(s) and Schedule:** Gainesville must submit to the FTA regional office updated equipment records which include all of the required information.

## B. Maintenance

**Basic Requirement:** Recipients must keep federally funded vehicles, equipment, and facilities in good operating condition. Recipients must keep ADA accessibility features on all vehicles, equipment, and facilities in good operating order.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Maintenance.

## 9. Procurement

**Basic Requirement:** The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, and conform to applicable Federal law and the standards identified in 2 CFR Part 200. State recipients can use the state's overall policies and procedures. When applied to Federal procurements, those policies and procedures must still be compliant with all Federal requirements as applied to non-state recipients. The flexibility afforded by 2 CFR Part 200 should not be misconstrued as absolving a state from Federal requirements. For example, FTA does not require each State DOT to have policies and procedures separate from the state education department.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Procurement.



**Procurement History Files Examined during this Triennial Review:**

<b>Goods/Services Procured</b>	<b>Award Date</b>	<b>Method</b>	<b>Type</b>	<b>Amount</b>
2 Gillig 40' low-floor battery electric buses and charging equipment	3/29/19	Specified Source	Rolling Stock	\$2,185,531
Hicks Seal Coating and Striping	10/18/17	IFB	Construction	\$319,683
Clever Devices, 112 upgraded vehicle annunciators	12/14/18	Sole Source	Equipment	\$1,356,268
Creative Bus Sales, 2 Champion Cutaway transit vehicles	10/12/18	Piggyback (FDOT, TRIPS)	Rolling Stock	\$168,902
10 Gillig 40' low-floor diesel buses	6/12/20	Piggyback (JTA)	Rolling Stock	\$5,052,710

**10. Disadvantaged Business Enterprise (DBE)**

**Basic Requirement:** Recipients must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of USDOT assisted contracts. Recipients also must create a level playing field on which DBEs can compete fairly for US DOT-assisted contracts.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the US DOT requirements for DBE.

**11. Title VI**

**Basic Requirement:** The recipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance without regard to whether specific projects or services are federally funded. The recipient must ensure that all transit services and related benefits are distributed in an equitable manner.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Title VI.

## 12. Americans with Disabilities Act (ADA) – General

**Basic Requirement:** Titles II and III of the ADA of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the US DOT requirements for ADA – General.

## 13. ADA – Complementary Paratransit

**Basic Requirement:** Under 49 CFR 37.121(a), each public entity operating a fixed-route system shall provide paratransit or other special service to individuals with disabilities that is comparable to the level of service provided to individuals without disabilities who use the fixed route system. “Comparability” is determined by 49 CFR 37.123-37.133. Requirements for complementary paratransit do not apply to commuter bus, commuter rail, or intercity rail systems.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with US DOT requirements for ADA – Complementary Paratransit.

## 14. Equal Employment Opportunity (EEO)

**Basic Requirement:** The recipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving Federal financial assistance under the Federal transit laws. (Note: Equal Employment Opportunity Commission’s regulation only identifies/recognizes religion and not creed as one of the protected groups.)

**Finding:** During this Triennial Review of RTS, one deficiency was found with the FTA requirements for Equal Employment Opportunity. RTS submitted an updated EEO program in TrAMS on February 25, 2020 and revised the program several times in response to FTA comments. FTA responded to the August 11, 2020 upload with a concur letter dated August 12, 2020 and including a checklist of requested revisions. An explicit statement that RTS has no subrecipients has not yet been added to the 2020 EEO program.

DEFICIENCY CODE EEO1-3: Revisions to EEO program not made

**Corrective Action(s) and Schedule:** Gainesville must revise and upload its EEO program to TrAMS and notify the RCRO once completed.

## 15. School Bus

**Basic Requirement:** Recipients are prohibited from providing school bus service in competition with private school bus operators unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for School Bus.

## 16. Charter Bus

**Basic Requirement:** Recipients are prohibited from using FTA-funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Recipients are allowed to operate community-based charter services pursuant to certain regulatory exceptions.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Charter Bus.

## 17. Drug Free Workplace Act

**Basic Requirement:** Recipients are required to maintain a drug free workplace for all award-related employees; report any convictions occurring in the workplace timely; and have an ongoing drug-free awareness program.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Drug-Free Workplace Act.

## 18. Drug and Alcohol Program

**Basic Requirement:** Recipients receiving Section 5307, 5309, 5311, or 5339 funds that have safety-sensitive employees must have a drug and alcohol testing program in place for such employees.

**Finding:** During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Drug and Alcohol Program.

## 19. Section 5307 Program Requirements

**Basic Requirement:** For fixed-route service supported with Section 5307 assistance, fares charged seniors, persons with disabilities or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.



Recipients are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.

Recipients shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a program of projects (POP).

Finding: During this Triennial Review of RTS, no deficiencies were found with the FTA requirements for Section 5307 Program Requirements.

## 20. Section 5310 Program Requirements

Basic Requirement: Recipients must expend funds on eligible projects that meet the specific needs of seniors and individuals with disabilities. Projects selected for funding under the Section 5310 program must be included in a locally developed, coordinated public transit-human services transportation plan. Recipients must approve all leases of Section 5310-funded vehicles and ensure that leases include required terms and conditions. Either the recipient or subrecipient must hold title to the leased vehicles.

Finding: This section only applies to recipients that receive Section 5310 funds directly from FTA; therefore, the related requirements are not applicable to the review of RTS.

## 21. Section 5311 Program Requirements

Basic Requirement: Recipients must expend funds on eligible projects to support rural public transportation services and intercity bus transportation.

Finding: This section only applies to recipients that receive Section 5311 funds directly from FTA; therefore, the related requirements are not applicable to the review of RTS.



## V. Summary of Findings

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
1. Legal	ND				
2. Financial Management and Capacity	D	F4-1: ECHO documentation deficient	Gainesville must submit to the FTA regional office procedures for documenting ECHO draws, and documentation of training conducted of the appropriate staff on new policies and procedures.	9/30/21	
3. Technical Capacity – Award Management	ND				
4. Technical Capacity – Program Management and Subrecipient Oversight	ND				
5. Technical Capacity – Project Management	ND				
6. Transit Asset Management	ND				
7. Satisfactory Continuing Control	D	SCC8-3: Insufficient equipment records	Gainesville must submit to the FTA regional office updated equipment records which include all of the required information.	9/30/21	
8. Maintenance	ND				
9. Procurement	ND				
10. Disadvantaged Business Enterprise	ND				
11. Title VI	ND				
12. Americans with Disabilities Act (ADA) – General	ND				

Review Area	Finding	Deficiency Code(s)	Corrective Action(s)	Response Due Date(s)	Date Closed
13. ADA – Complementary Paratransit	ND				
14. Equal Employment Opportunity	D	EEO1-3; Revisions to EEO program not made	Gainesville must revise and upload its EEO program to TrAMS and notify the RCRO once completed.	9/30/21	
15. School Bus	ND				
16. Charter Bus	ND				
17. Drug-Free Workplace	ND				
18. Drug and Alcohol Program	ND				
19. Section 5307 Program Requirements	ND				
20. Section 5310 Program Requirements	ND				
21. Section 5311 Program Requirements	ND				

The metrics used to evaluate whether a recipient is meeting the requirements for each of the areas reviewed are: Deficient (D)/Not Deficient (ND)/Not Applicable (NA)

## VI. Attendees

Name	Title	Phone Number	E-mail Address
<b>Gainesville RTS</b>			
Jesus Gomez	Transit Director	352-393-7860	gomezjm@cityofgainesville.org
Kimberly Sweigard	Business Services Manager	352-393-7852	sweigardka@cityofgainesville.org
Margie Allen	Transit Grants Program Specialist	352-393-7819	allenme@cityofgainesville.org
Carla Benison	Accounting Manager	352-393-8741	benisoncd@cityofgainesville.org
Diane Wilson	Assistant Finance Director	352-393-8775	wilsondm@cityofgainesville.org
Roy Darnold	Transit Operations Manager	352-393-7861	darnoldrt@cityofgainesville.org
Krys Ochia	Transit Planning Manager	352-393-7820	ochiak1@cityofgainesville.org
Paul Starling	Fleet Maintenance Manager	352-393-7840	starlingpk@cityofgainesville.org
Patti Wiggs	Transit Customer Advocate	352-393-7870	wiggspk@cityofgainesville.org
Millie Crawford	ADA Paratransit Coordinator	352-393-7826	crawfordmal@cityofgainesville.org
Daphne Seseo	Procurement Specialist 3	352-393-8794	sescoda@cityofgainesville.org
Kathryn Alford	Transit Asset Management Analyst	352-393-7876	alfordkd@cityofgainesville.org
Jason Bunce	Transit Safety & Security Officer	352-393-7843	bunceje@cityofgainesville.org
Cintya Ramos	Budget & Finance Director	352-393-8782	ramoscg@cityofgainesville.org
<b>FTA</b>			
Chris White	General Engineer	404-865-5619	christopher.white@dot.gov
Dwight Hill	Procurement Specialist	404-865-5641	dwight.hill.CTR@dot.gov
Michele Foster	Regional Civil Rights Officer	404-865-5600	doretha.foster@dot.gov
<b>Interactive Elements Inc.</b>			
Patti Monahan	Reviewer	617-291-8431	patti.monahan@monahanmobility.com

## **VII. Appendices**

No appendices included in this report.

**Ochia, Krys**

**Subject:** FW: ID: 1084; City of Gainesville Regional Transit System (RTS), FL., Region IV FY21 Triennial Review FINAL Report

**From:** Allen, Margery E. <[allenme@cityofgainesville.org](mailto:allenme@cityofgainesville.org)>  
**Sent:** Thursday, September 30, 2021 4:16 PM  
**To:** Hill, Dwight CTR (FTA) <[Dwight.Hill.CTR@dot.gov](mailto:Dwight.Hill.CTR@dot.gov)>; White, Christopher (FTA) <[Christopher.White@dot.gov](mailto:Christopher.White@dot.gov)>; [doretha.foster@dot.gov](mailto:doretha.foster@dot.gov)  
**Cc:** Gomez, Jesus M. <[gomezjm@cityofgainesville.org](mailto:gomezjm@cityofgainesville.org)>; Sweigard, Kimberly A. <[sweigardka@cityofgainesville.org](mailto:sweigardka@cityofgainesville.org)>; Ochia, Krys <[OchiaK1@cityofgainesville.org](mailto:OchiaK1@cityofgainesville.org)>  
**Subject:** RE: ID: 1084; City of Gainesville Regional Transit System (RTS), FL., Region IV FY21 Triennial Review FINAL Report

Good afternoon Dwight, Chris and Michelle,

I hope you are doing well. Gainesville Regional Transit has completed the requested steps for its finding #14, EEO1-3: "Gainesville must revise and upload its EEO program to TrAMS and notify the RCRO once completed." This item's due date is 10/29/2021, however, we were able to complete it ahead of schedule.

Due to the size of the file I have not attached it to this e-mail; the information is uploaded to our TrAMS documents. The revised plan was approved by the Gainesville City Commission on 9/23/2021, and that information is included with the revised plan. Below is a screen snip of the TrAMS information.

<b>Existing Documents</b>			
Document Context	Document Type	Document File Name	Document Di
Civil Rights	EEO Other Documentation	#1084 Gvl RTS EEO Program Revised & Approved by CC 9-23-2021.pdf	#1084 Revise Triennial Finc

Please advise if any questions or if you need anything else to complete this finding. Thank you.

Margie  
 Transit Grants Program Specialist  
 352.393.7819

**From:** Hill, Dwight CTR (FTA) <[Dwight.Hill.CTR@dot.gov](mailto:Dwight.Hill.CTR@dot.gov)>  
**Sent:** Wednesday, September 8, 2021 4:11 PM  
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**Subject:** ID: 1084; City of Gainesville Regional Transit System (RTS), FL., Region IV FY21 Triennial Review FINAL Report  
**Importance:** High

Hello Mr. Feldman,

We hope all is well. Please find attached the subject report for your review/records. We look forward to working w/Gainesville, to close this review. If you have any questions please don't hesitate to contact the POC noted in the report and/or the undersigned.

v/r

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Contact for Region IV 'Virtual' Procurement Training

# **Appendix H**

## **Outreach Efforts**

## Summary of RTS Outreach Efforts

FY 2020

### October

- October 1 GHA Stakeholder Strategic Planning Meeting/ Cotton Club 837 SE 7th Ave Gainesville
- October 2 AIGA Design Palomino
- October 9 UF's Sustainable Transportation Fair
- October 14 GCRA Stakeholder Workshop Cotton Club
- October 22 The City Commission is hosting the first of four district-specific town hall meetings at 6:30 p.m. at Ironwood Golf Course. Commissioner Gigi Simmons will preside over the District 1 Town Hall

### November

- November 4 GCRA John Dukes Cafeteria Duval Early Learning Center
- November 5 UF CISE event at Reitz Union
- November 12 Job Fair Career Source "pay checks for patriots"
- November 14 LEAN Continuous Improvement Green Belt Workshop, HR Training Room, Old Library Building

### December

- December 6 SFC Internship fair
- December 6 Depot Park Lighting of the park, hosted by Commissioner Gigi Simmons and City Manager Lee Feldman

FY 2021

- 7/28/21 Citizen Advisory Board (At RTS)
- 7/22/21 Greater Duval Summer Program Tour of RTS
- 11/10/21 Job Fair Duval Heights 8<sup>th</sup> Ave NE17th St.
- 12/01/21 Gainesville Housing Authority Job Fair
- 12/1/21 Rosa Parks day at Rosa parks Transfer Station



# **Appendix I**

## **RTS LAP**

## RTS LAP PLAN

### 4 Language Assistance Plan

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

- #### LEP Population Served

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

- #### Language Assistance Services

Existing LAP elements at RTS is shown in the table below. These are the services that will be evaluated and updated, as necessary. They are divided into three types of services: written, oral, and community outreach, and some of them are being monitored for relevance; and, therefore, are designated NA.

#### RTS LAP Program Elements

##### A. Written Language Assistance

*Translated "How to Ride" Brochures*  
*Translated fare payment instruction*  
*Translated system maps and timetables*  
*Translated safety and security announcements*  
*Translated Title VI forms*  
*Pictographs in stations and bus fleet*  
*Ticket vending machines with multilingual options*

##### B. Oral Language Assistance

*Contracting for interpreters on "as needed" basis*  
*Using RTS bi-lingual personnel to interpret information*  
*Using telephone interpreter services*  
*Translated recorded information in buses and transfer stations*

#### Fare Schedule in Spanish and English

Bus Fare Tarifa de Autobús	Cash Fare Tarifa Efectiva Efectivo (Solo Vía)	All-Day Pass Pase Para Todo el Día
Adulto Adulto	\$1.50	\$3.00
Senior Citizens 65+ Adultos de 65 o más años	\$0.75	\$3.00
Students Grade K-12 Estudiantes de grado K-12	\$0.75	\$3.00
<small>No se requiere identificación</small>		
Santa Fe College & City College Students Estudiantes de SFC y City College	\$0.75	\$3.00
<small>No requiere identificación de estudiantes con foto</small>		
Medicaid & Medicare Recipients Acreditado de Medicaid y Medicare	\$0.75	\$3.00
<small>No requiere identificación con foto</small>		
Veterans & Active Duty Military En servicio activo y veteranos militares	\$0.75	\$3.00
<small>No requiere identificación con foto</small>		
University of Florida Students, Faculty & Staff Estudiantes, facultad y personal de Universidad de Florida		Válido (suma 1 \$)
<small>Válido (suma \$10.00)</small>		
Shands, City of Gainesville & GRU Employees Empleados de Shands, City of Gainesville y GRU		Válido (suma \$10.00)
<small>Válido (suma \$10.00)</small>		
Veterans Affairs & Alachua County Employees Empleados de Veterans Affairs y Alachua County		Válido (suma \$10.00)
<small>Válido (suma \$10.00)</small>		
ADA Certified Persons Personas con certificado ADA		Válido (suma \$10.00)
<small>Válido (suma \$10.00)</small>		

**No Fare, No Pass, No Ride!**  
**Si No Paga o No Tiene Pase, No Viaja!**

It is a crime to refuse to pay a fare or attempt to evade payment of fare.  
 Violators may be prosecuted under §12.015 Florida Statutes.  
 Es un crimen negarse a pagar el pasaje o intentar evadir el pago del pasaje.  
 Los violadores pueden ser procesados judicialmente según  
 el estatuto §12.015 del estado (Florida).

C. Community Outreach

*Translated TV and newspaper notices*

*Translated radio announcements*

*Placing notices in community media*

*Ensuring that interpreters are available (when requested) at public meetings*

***Note: RTS currently does not have electronic signs at its bus stops.***

# **Appendix J**

## **RTS Service Standards**

## RTS Service Standards

The RTS service standard framework includes measures or policies related to route design, bus stop and amenity provision, service delivery, safety and customer satisfaction, and effectiveness and efficiency. Depending on the measure, standards either represent a minimum or maximum threshold. For example, standards related to operating expense measures represent maximum thresholds not to be exceeded, while standards related to productivity measures represent minimum thresholds to be exceeded and, standards related to service changes relate to whether or not the 5% threshold is exceeded.

A potential adverse effect is a geographical or time-based addition or reduction in service that includes but is not limited to: changes to span of service, changes to frequency of service, or elimination of routes or route segments.

A disparate impact occurs when the minority percentage of the population adversely affected by a major service change is greater than the average minority percentage of the population of RTS' service area.

A disproportionate burden occurs when the low income percentage of the population adversely affected by a major service change is greater than the average low-income percentage of the population of RTS' service area (see Appendix K). RTS did not undertake any major service changes during this reporting period.

- **Effectiveness and Efficiency**

In transit terminology, effectiveness refers to comparisons of passenger travel to another service attribute while efficiency refers to comparisons of time and money or distance and money.<sup>12</sup> Effectiveness and efficiency measures generally result from comparing:

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

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

Service effectiveness:

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

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

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

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<sup>12</sup> Data for all measures comes from Automatic Vehicle Location (AVL), Automatic Passenger Counters (APC), GIS, or farebox software.

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

Revenue Miles between Vehicle Failures:

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

#### 4..1.1 **Passenger Miles per Seat Miles**

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

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

Historically, RTS's average trip length has been short, especially for UF-based routes.<sup>13</sup> This measure, however, serves to balance longer, moderately productive RTS routes against those short, highly productive campus-bound routes. RTS's service standard for this measure is 25% per route.

#### 4..2

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

#### 4..2.1 **Operating Expense per Passenger Trip**

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

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

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

#### 4..2.2 **Farebox Recovery Ratio**

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

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

<sup>13</sup> In 2010 and 2011, RTS had the shortest trip length of all Florida transit agencies reporting to the NTD. The only other system with a similar average, StarMetro, is also in a student concentrated area.

Fare revenues do include UF or Santa Fe College (SFC) service agreement funding.<sup>14</sup> A route with operating expenses of \$100,000 and fare revenue of \$25,000 has a farebox recovery ratio of 25% and is less cost effective than a route with a farebox recovery ratio of 50%. RTS's service standard for this measure is set system-wide at 18%.

#### 4..2.3 *Subsidy per Passenger Trip*

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

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

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

#### 4..3

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

#### 4.3.1 *Operating Expense per Revenue Mile and Operating Expense per Revenue Hour*

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

#### 4.3.2 *Passenger Trips per Employee Full-time Equivalent (FTEs)*

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

- **Safety and Customer Satisfaction**

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

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<sup>14</sup> There are limitations in both including and not include service agreement funding. Including it fails to capture instances where UF students utilize non-UF-funded routes, but not including it is misleading where UF students occupy the majority of route ridership and there is no expectation they will pay a fare. In its absence, the local subsidy will appear much larger than what it actually is, since the student fee is supposed to estimate the revenue that RTS would earn if students had to pay. The revenue RTS collects from its Employee Pass Program is not included in fare revenue since it cannot be allocated to specific routes. RTS will primarily evaluate fare structure changes based on those routes not subsidized by UF and SFC.

## 4.1

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

## 4.2

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

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

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

### • Service Delivery

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

## 4.1

Beyond safety, no other factor has a bigger influence on ridership than on-time performance. As routes fall off schedule, passenger loads shift and vehicles bunch forcing customers to seek out other modes of travel to combat transit travel discomfort and apparent capriciousness. *On-time performance* compares scheduled arrival and departure times against actual arrival and departure times at all specified time points. The measure may bifurcate further by time of day, day of week, and block (as surrogate for personnel) and reflect needed adjustments related to traffic conditions, passenger loads, and layover requirements.<sup>16</sup>

**Table 1. On-time Performance Example**

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

<sup>15</sup> RTS currently tracks customer suggestions and complaints in different databases depending on whether they are maintenance or planning related, which is itself often a judgment call. This separate storage of information results from historic organizational dynamics, and the separate electronic interfaces RTS customers have to submit comments. Future plans involve combining both databases into a single location.

<sup>16</sup> RTS will utilize APC for all measures related to on-time performance. Though APC units are not installed on the entire RTS fleet, the sampling methodology developed by RTS allows for full system coverage.



On-time performance standards consistent of the margin of lateness and earliness for which a vehicle can still be classified as on-time and the overall desired performance of each route. For RTS, a vehicle is considered on time if it departs a scheduled timepoint no more than 1 minute early and no more than 5.5 minutes late.<sup>17</sup> Table 9 specifies on-time performance standards.<sup>18</sup> RTS will pay particular attention to on-time performance for low frequency routes since the penalty to the patron is so much greater.

**Table 2. On-time Performance Standards**

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

#### 4.2

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

RTS provides Automatic Vehicle Location (AVL) services to its patrons. RTS operates 99-116 vehicles in peak service during the primary UF semesters and in turn has equipped 144 buses with AVL equipment. Moreover, RTS utilizes APC to collect passenger information. APC equipment resides on 108 vehicles. As a result, these vehicles may be rotated system-wide on a weekly basis to ensure adequate sampling. RTS' service standard for this measure is at the system level and stated as "Vehicles will be assigned to routes such that the average age of the fleet serving each route does not exceed 12 years and no route or set of routes will routinely have the vehicles towards the end of their useful life."

#### 4.3

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

##### 4.3.1 *Temporal Availability*

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

<sup>17</sup> "On-time" relates directly to an agency's definition of early and late. The wider the margin, the more leniency an agency is providing itself. Early departures are viewed as more problematic than late arrivals since individuals are required to wait the entire length of the scheduled frequency for the next bus.

<sup>18</sup> When calculating on-time performance as part of the route performance value, RTS will look at overall on-time performance across these periods.

on 80% of all fixed routes running on those days.”<sup>19</sup>

**Table 3.Desired minimum service span**

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

#### 4..3.2 *Spatial Availability*

Areas within ¼ to ½ mile of a transit stop are considered to have transit access. RTS’s service standard for spatial availability is at the system level and stated as “80% of the Census Block Groups with their geographic center completely within the RTS service area will be considered served if the geographic center of the Block Group is within ½ mile of a transit stop.”<sup>20</sup>

#### 4..4

Service frequency measures the amount of time between two transit vehicles passing the same point in the same direction on the same route. As frequencies increase, so do costs. Thus, frequencies should be based on existing or potential demand.<sup>21</sup> Nonetheless, below a certain level (typically >60 minutes), passengers cannot reach their destination in a meaningful period of time. Table 3 sets the system-wide service frequency standards RTS will seek to achieve; these are set regardless of demand in order to provide attractive service level. Individual route frequency will derive from the productivity measures outlined above; all minimum peak frequencies are subject to funding but will never be diminished to more than 75 minutes.

**Table 4.Desired minimum frequency**

Route type	Peak <sup>22</sup>	Off-Peak	Saturday	Sunday
<b>UF campus routes</b>	20 minutes	45 minutes	45 minutes	60 minutes
<b>City/County routes</b>	20 minutes	45 minutes	45 minutes	60 minutes
<b>Later Gator routes</b>	N/A	45 minutes	45 minutes	N/A

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

<sup>19</sup> Note that a route meeting the minimum service span standards in Table 10 for City/County routes would be in service for almost 4,700 hours, less any holidays or reductions in service. Given the continued growth in ridership, RTS also plans to strategically add a minimum of 4,000 service hours each year.

<sup>20</sup> RTS acknowledges that geographic proximity and access to transit are not synonymous due to access barriers like walls, train tracks, and the absence of sidewalks. However, RTS lacks access to more sophisticated network analysis tools to develop a more refined measure.

<sup>21</sup> As an example, RTS has a FDOT Transit Development Plan (TDP) initiative to provide 20 minute frequencies or better to all areas zoned as High Density Residential, Activity Center, or Urban Mixed Use because these areas have the greatest concentrations of employment and housing and thus the greatest propensity to use transit.

<sup>22</sup> Peak service is defined as Monday thru Friday between 8:00 AM and 10:30 AM and 4:00PM and 6:30 PM.

## 4..5

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

**Table 5. Vehicle Load Maximum Standards**

Vehicle Type	Seats	Maximum Peak Loading Standard <sup>23</sup>	% of Max. Capacity to Seats on Vehicle in Peak	Maximum Off-Peak Loading Standard	% of Max. Capacity to Seats on Vehicle in Off-Peak
40-foot standard bus	40	50	125%	45	112%

- **Bus Stops**

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

## 4..1

Bus stop amenities ensure safety, accessibility, and comfort at RTS stops. RTS uses ridership levels to ensure equitable distribution of amenity provision rather than just focusing on select corridors or sections of the RTS service area.<sup>24</sup> Table 13 shows the thresholds RTS uses when allocating amenities.

**Table 6. Bus Stop Amenity Thresholds**

Stop Type	Daily Passengers	Amenities
I	<15	Stop Sign And Landing Pad
II	≥15 and ≤80	Shelter Types I, II, And III
III	>80	Bus Bay And Shelter

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

<sup>23</sup> A value of 50 with a seating capacity of 40 assumes that 40 individuals are seated and 10 are standing.

<sup>24</sup> Most local funding for stop improvements comes from developer fees. These funds must be expended within ¼ to ½ mile from where they were collected. Since state and federal grants typically require a local match, their expenditures are often tied together. Since fiscal year 2014, RTS is coordinating with City and County Public Works to give them lists of the most active stops that lack sidewalk connections, lighting, and street crossing signage to take advantage of any funding they may have for stop improvements.

## 4.2

Bus stop spacing is based on several factors, including customer convenience, ridership demand, and vehicle speed. Closely spaced stops reduce walking distance but slow buses down, while stops spaced further apart increase walking distance but speed buses up. RTS's service standard for this measure is system-wide at six to eight stops per mile or every 660 to 880 feet. This interval will fluctuate depending on the presence or absence of trip generators and safety and accessibility concerns.<sup>25</sup> Bus stops with <5 daily passengers over a year long period will be reviewed for elimination.

- **Route Design**

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

## 4.1

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

## 4.2

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

- Zero-vehicle households (>8.04%)<sup>26</sup>
- ≥ 65 years old (>12.81%)<sup>27</sup>
- Below Poverty (>35.15%)<sup>28</sup>

## 4.3

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

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<sup>25</sup> All stops to the greatest extent possible should follow Crime Prevention through Environmental Design (CPTED) policies regarding landscaping and lighting to allow for safety from injury and crime. This includes removing landscaping that hinders vision of a stop from a driver's perspective and relocating stops to allow drivers to easily see waiting passengers when approaching a bus stop. All stops must also be accessible to any persons waiting to use transit, including disabled riders.

<sup>26</sup> U.S. Census Bureau, 2017 American Community Survey 5-year estimates, B25044: Tenure by Vehicles Available.

<sup>27</sup> U.S. Census Bureau, 2017 American Community Survey 5-year estimates, B01001: Sex by Age.

<sup>28</sup> U.S. Census Bureau, 2017 American Community Survey 5-year estimates, B17017: Poverty Status in the Past 12 Months by Household Type by Age of Householder.

175% of the shortest possible driving distance between these two points by personal automobile.”<sup>29</sup>

Deviations from the basic alignment of a fixed route should only occur to serve major activity centers or to provide coverage to areas with limited access to transit, and they should result in an increase in productivity. The additional time needed to deviate from the basic alignment should not exceed 5 minutes or 10% of the one-way travel time of the existing route without deviation and be of no greater distance than 1 mile.

Branches or short-turns should be reviewed as possible alternatives where passenger load after a certain point is only a fraction of the maximum load.<sup>30</sup> Routes may include up to 2 branches but only 1 short-turn.

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

#### 4.4

Slow travel speeds mean more time spent on unproductive activities and, in particular, can result in lost wages. Travel speed will compare system-wide average speeds against a weighted average (miles of roadway) of roadway speeds.<sup>31</sup> RTS’s service standard for this measure is system-wide and sets transit speeds at no less than 66% of the weighted average roadway speed.

#### 4.5

Route spacing indicates the extent of service duplication, unused capacity, and how well RTS distributes its services. While routes should intersect with other routes to allow transfers, parallel routes operating closely together have the potential to split service demand. RTS will calculate for each route, the miles it overlaps with all other individual routes relative to its own total length and then consider the maximum of these numbers. No RTS route should overlap with any other single route for more than 33% of its length.<sup>32</sup>

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<sup>29</sup> RTS will use widely available, internet-based trip planning algorithms to make these calculations. The measure will consider distance traveled from one bus endpoint to the other divided by the optimal driving distance between these two points as identified by the trip planning software.

<sup>30</sup> A branch is one of two or more outer route segments served by a single route. Short turns are routes where some vehicles travel the entire length of the route while others turn around at a designated point along the route.

<sup>31</sup> RTS recognizes the limits of this approach since it does not include walk time, wait time, or fully capture in-vehicle time. Future service standard versions may create a set of 5-10 origin/destination pairs identified through origination/destination surveys and compare auto versus transit travel times.



<sup>32</sup> Special conditions may exist that necessitate routes to operate within closer proximity than this guideline suggests.

# **Appendix K**

## **RTS Service/Fare Change Policy**

CITY OF GAINESVILLE  
PUBLIC WORKS OPERATIONS MANUAL

**CHAPTER 35 – Public Comment**

DIVISION: Regional Transit System (RTS)  
SECTION:  
PROCEDURE #: 35.12  
SUBJECT: Public Comment  
EFFECTIVE DATE: 10/31/09 REVISED: 09/29/11, 11/18/13, 11/16/16  
PREPARED BY:  Jesus Gomez, RTS Director  
APPROVED BY:  Teresa Scott, P.E., Public Works Director

**POLICY:**

The City of Gainesville Regional Transit System (RTS) adopts and is in compliance with the policies set forth by the City of Gainesville, the Department of Transportation's (DOT) Title 49 Code of Federal Regulations (C.F.R.) Transportation (current as of November 16, 2016), the Federal Transit Administration (FTA), and the Florida Department of Transportation (FDOT). RTS shall post information, conduct public meetings, and hold public hearings to ensure that the public, and affected organizations, have an opportunity to comment on proposed transit service changes or fare changes.

**PRACTICE:**

All major service changes or fare changes shall be presented to the RTS Citizens Advisory Board (RTS CAB) for their review and recommendation to the City Commission. Based on feedback from the RTS CAB applicable changes are made and then presented at a public meeting for final review and feedback. Necessary modifications are made again to respond to public comment. . A major service change shall be defined as any change that exceeds 5% of the total revenue hours by route or total revenue miles by route. All fare changes are subject to City Commission approval.

All minor service changes shall be presented to the RTS CAB for their review and recommendation to the RTS Director prior to implementation. Minor service changes shall be defined as any change equal to or less than 5% of the total revenue hours by route or total revenue miles by route.

**GUIDELINES:**

RTS follows the public comment process for service and/or fare changes as shown below.

1. RTS proposes a service change and determines if the service change is a major or minor service change. Major service changes shall be presented to the RTS CAB and public at two public meetings. Minor service changes shall be presented to the RTS CAB only. All fare changes shall be presented to the RTS CAB at a public meeting and to the City Commission for approval at a public hearing.
  - a. For Major Service Changes, a noticed public meeting shall be provided in a newspaper of general circulation for the RTS service area, at least two (2) weeks prior to the advertised public meeting. Such advertisement shall include information such as the meeting date,



CITY OF GAINESVILLE  
PUBLIC WORKS OPERATIONS MANUAL

time, location, brief description of the proposed changes and special accommodations and/or transportation that may be available to attend the public meeting.

- b. After presenting the proposed service changes at the RTS CAB and general public meetings, RTS staff will notify the City Commission of any RTS CAB concerns or opposition and respond appropriately.

# **Appendix L**

## **Fare Equity Analysis**

### **Title VI Equity Analysis**

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

Identifying a site or location for a new facility (excluding bus shelters) or constructing a facility during the period covered by the RTS Title VI program does not apply for this Plan.