

ROGUE VALLEY TRANSPORTATION DISTRICT TITLE VI PROGRAM

Program Years 2024-2027

October 1, 2023 – September 30, 2026

ROGUE VALLEY TRANSPORTATION TITLE VI PROGRAM

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ROGUE VALLEY TRANSPORTATION DISTRICT

JACKSON COUNTY

OREGON

* * *

RESOLUTION NO. 23-04

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C.§2000d et seq ("the Act") and 49 CFR Part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

WHEREAS, as a recipient of federal funds, Rogue Valley Transportation District ("RVTD") is required to comply with the requirements of the Act and applicable implementing regulations; and

WHEREAS, pursuant to FTA Circular 4702.1B, RVTD is required to submit its Title VI Program to the government board for approval; and

WHEREAS, the RVTD Board of Directors has considered and determined to approve RVTD's Title VI Program, attached hereto as Exhibit A, to be effective through September 30, 2026; and

WHEREAS, the RVTD Board has the authority under ORS Chapter 267 to approve by resolution the "Title VI Program."

NOW, THEREFORE, BE IT RESOLVED that the RVTD Board of Directors approves RVTD's FFY 2024-2027 Title VI Program, policies and activities as set forth in Exhibit A.

This Resolution adopted this 15th day of November 2023.

Chair of the Board

ATTEST:



ROGUE VALLEY TRANSPORTATION DISTRICT TITLE IV PROGRAM

Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

I. PLAN STATEMENT

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

II. PROGRAM OVERVIEW

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

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

III. GOALS AND OBJECTIVES

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

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

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

IV. TITLE VI COORDINATOR ACTIVITIES

CONTACT

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

or

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

Luanne Spencer, Administration Manager Compliance Coordinator Rogue Valley Transportation District 3200 Crater Lake Avenue Medford, OR 97504-9075 lspencer@rvtd.org

Phone: 541-608-2401 Fax: 541-773-2877 Julie Brown, General Manager Compliance Officer Rogue Valley Transportation District 3200 Crater Lake Avenue Medford, OR 97504-9075 jbrown@rvtd.org

Phone: (541) 779-5821 Fax: (541) 773-2877

TITLE VI NOTICE TO THE PUBLIC

See Exhibit A for the Title VI Public Notice in English and Spanish full text version. See Exhibit B for the Title VI Public Notice in English and Spanish abbreviated versions used in the fixed-route and paratransit vehicles.

List of locations where notice is posted:

- All RVTD fixed-route motor bus vehicles
- All RVTD paratransit vehicles
- All RVTD Connector Services vehicles
- Within the Administrative Building receptionist lobby
- Within the Valley Lift/Translink receptionist lobby
- Online at www.rvtd.org on the main How To Ride webpage

V. PUBLIC PARTICIPATION PLAN

i. REVIEW OF CURRENT SERVICE

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

RVTD's planned service enhancements are described in full detail in RVTD's 2040 Transit Master Plan (2017-2042). In September 2003 RVTD adopted two trunk routes, Route 10 serving Medford, Phoenix, Talent and Ashland and Route 60 serving Medford and White City; when combined these routes support 60% of the ridership. The 2040 Transit Master Plan identifies service enhancements that will be implemented over the course of 25 years. Each service enhancement was individually evaluated to quantify the effect on surrounding communities with a specific focus on low-income, LEP, and minority populations.

The 2040 Transit Master Plan was vetted extensively with community groups and jurisdictions prior to adoption by the RVTD Board in 2019. As of 2023, RVTD has nearly completed the short range planning list due to additional state funding growing the service from 9 routes to 14 routes between 2019-2023. The following service was added:

- Route 24 to East Medford enhanced to 20 minute headways along with expanding the route into a previously unserved neighborhood.
- Route 26 in East Medford provides service to medical campuses as well as educational facilities and affordable shopping options.
- Route 27 is a crosstown route which connects to eight different routes across the system allowing for greater access and increased transfer ability.

- Route 63 connect between White City and Eagle Point, a previously unserved city, one-hour headways.
- Route 1X is an express route from Medford to Ashland using I-5 on one hour headways allows students and service workers commuting into Ashland a higher level of service than they have traditionally had.
- Most recently Route 17 was added in Ashland serving neighborhoods with lower incomes and minorities.

RVTD will continue to monitor the progress of implementing services outlined in the 2040 Transit Master Plan and update the plan when deemed necessary. A checklist of performance monitoring questions will be reviewed to determine if updates to the 2040 Transit Master Plan are necessary.

ii. REVIEW OF RECENT SERVICE CHANGES

In 2017 the Oregon state legislature passed HB 2017 which created a permanent funding source for transit agencies across the state. Funding is collected by the state through a 0.1% employee payroll tax and is distributed to transportation providers statewide to increase access to jobs, improve mobility, relieve congestion, and reduce greenhouse gas emissions, while providing a special focus on low-income populations. The new funding source created by the passage of HB 2017 allowed RVTD to implement service enhancements outlined in the short-range timeframe of the 2040 Transit Master Plan.

To conduct Title VI analysis RVTD began using the FDOT and CUTR Transit Boarding Estimation Tool (TBEST) in 2013 which can analyze not only ridership changes due to service availability but also demographics of residents in the service area at the parcel level. RVTD has the capacity to run the model to see the impacts of service changes to certain populations including Title VI designated populations. More recently, RVTD began using a web-based transit modeling tool called Remix that can provide data about Title VI impacts to aid with service planning decisions.

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

Service Changes Overview:

In 2016 RVTD was successful with gaining support for a local property tax levy that added Saturday service and two additional routes. RVTD was forced to cut service in 2015 due to funding shortfalls and the levy also included 9 cents toward sustaining services. New routes introduced in 2016 included a route to serve the RCC Table Rock Campus in White City with high non-traditional student enrollment. The Route 61 also achieved a Medford School District vision to have Senior Highschool students access a direct transportation link to the RCC TRC which is 12 miles away and provided early college education opportunities. The

Route 25 to southwest Medford was increased from 60 minute to 30 minute frequency and serves a higher than average low-income and LEP population area.

- In 2018 Route 21 to north Medford resumed service providing access to several modestly priced grocery stores and a high older adult population residential area along Royal Ave and Poplar Ave.
- Also in 2018 RVTD increased service on the busy Route 10 on Saturdays to 30 minute frequency to mitigate passenger load concerns. Previously at one hour frequency the Route 10 was seeing 18 PPRH average over the day on Saturdays. Weekdays, the Route 10 is at 20 minute service.
- In July of 2019 RVTD realigned the Route 24 to expand the route's footprint into an additional neighborhood that was previously unserved by transit. In addition to expanding the physical footprint of the route, the frequency was increased from 30 minutes to 20 minutes as well as adding an additional three service hours on Saturdays.
- The Route 26 also provides service to the East Medford neighborhood which did not previously have access to public transit services. The new route originally operated on a 30-minute frequency Monday through Friday and hourly service on Saturdays. However due to COVID and the shortage of drivers RVTD cut service back to 60-minutes and has not resumed to pre-COVID levels. Route 26 provides a key connection to one of the region's largest employers, the Rogue Regional Medical Center.
- An express service named the Route 1X was added to the RVTD system in September of 2019 which connects Medford to Ashland with limited stops. Prior to the implementation of the 1X the only available transit connection between Ashland and Medford was the Route 10 which often faces delays and takes approximately one hour to complete a one way trip between the cities while also service Phoenix and Talent on the way. The 1X operates Monday through Friday on an hourly basis and allows passengers seeking a direct connection from Medford to Ashland a condensed travel time. Using the 1X allows students commuting to the Southern Oregon University campus or retail and food service jobs within Ashland's commercial district to complete the trip in approximately 20 minutes, rather than an hour.
- In December of 2019 RVTD utilized STIF funding allocated to providing service out of the district boundary to implement a new route to serve Eagle Point. Eagle Point is not within the RVTD district. Route 63 provides service to the city of Eagle Point which has never had access to a fixed-route transportation system. The route operates on an hourly frequency Monday through Saturday and allows residents of Eagle Point to travel down the Highway 62 corridor into the city of Medford where they are able access an increased number of services and jobs as well as access to the region's VA Rehabilitation Center and Clinic.
- The last of RVTD's fixed route service enhancements in 2019 was the Route 27 to the West Medford area. The West Medford neighborhood that is served by Route 27 previously did not have transit services and now has access to 60 minute service

Monday through Friday and hourly service on Saturdays. This route also ran on 30 minutes headways initially but was cut to 60 minutes due to driver shortages. Route 27 functions as a crosstown route and allows passengers from West Medford to travel to the East Medford neighborhood without requiring a trip to the main transfer station. Route 27 creates connections to eight other routes across the RVTD system and removes the need for many passengers to travel to the main transfer station to make a connection to another route.

• Most recently in June 2023 RVTD introduced Route 17, a new crosstown route in Ashland that provides connections to medical services, low-income housing, SOU and neighborhoods that were previously without fixed route service. This route replaced the Ashland Connector that operated between December 2019 through December 2021. Due to driver shortages and a pending Union grievance over the service RVTD decided to suspend the Microtransit service. The service was very successful with over 5 PPRH.

Changes to RVTD Fare:

- In 2016 RVTD piloted the nation's first account-based electronic fare collection system provided by Delerrok (now owned by Cubic). The TouchPass product is available to passengers on smart phone mobile app or a thick mil card. Account holders can access their account through the cloud to load fare, call RVTD personnel to add fare by phone, send a check to RVTD to add fare or visit one of three RVTD locations to add fare. Most time based and value based paper passes remained unchanged until 2019. Cash, tokens and some paper passes are still eligible on RVTD's services. The product branding changed to 'Umo' and accounts for approximately 70% of RVTD transactions. This electronic fare allows greater access to fare products where before passengers were required to visit one of the three locations to purchase fare in person. Additionally it has greatly improved schedule adherence by reducing delays at the farebox.
- In 2022 RVTD made two improvements to the Umo fare products through stored value and fare capping. These options provide passengers with a simple and affordable way to ride RVTD. With stored value there is no need to purchase a pass up-front which may be cost prohibitive for some passengers. Passenger instead can pay their fare as they ride and once they spend \$6 per day (\$3 for reduced fare riders) or \$56 per month (\$28 for reduced fare riders) the Umo system will 'cap' the account so that the passenger won't have to pay for any additional rides that day or for the rest of that month. Passengers can load anywhere from \$5 -\$120 at a time to their account. As they ride, the system deducts fare value from their account for each trip. This change significantly improves affordability while helping passengers choose the right fare product for their traveling habits.
- HB 2017 and the STIF funds for transit providers required mitigation to low-income communities by adopting fare subsidies or reduction programs. In 2019 RVTD began allocating \$50,000 annually toward this goal through a program called STIF Low Income Bus Passes. RVTD accepts applications from the region's low-income service providers to receive sums of single-ride, 6-ride and 20-ride passes. The

passes are distributed based on need and evaluated by the STIF Advisory Committee. To date RVTD has awarded fare to nearly 40 nonprofits who provide the passes to their clients and community members receiving their services. Based on the reports submitted to RVTD between 2021-2023, the majority of individuals receiving the passes are using them to access work and medical services.

Public Participation Activities:

- Public presentations and Public Hearings at regular Board meetings
- Public Notices in the newspaper and online at rvtd.org
- Rider Alerts posted in buses and at Front Street Station
- Public Notice in Caminos (local Latino publication)
- Comment forms provided to all reception personnel for phone comments
- Announcements at community groups and meetings
- Press Releases and articles written in local publications

iii. PLANNING ACTIVITIES COMPLETED DURING 2020-2023 REPORT PERIOD

- 1. In December 2020-January 2021 RVTD completed an electronic passenger survey that was available online. Due to COVID, RVTD was restricted from riding buses and for the first time conducted this survey electronically through links sent to passengers, QR codes they could scan on buses, emails sent to Umo customers and passenger alerts asking to visit the website. 95% of responses reported using RVTD's services in the past year providing RVTD with representative sample.
- 2. In March 2023 RVTD did an actual onboard survey. Onboard surveys are completed every three years (except for the aforementioned electronic survey) and will be conducted again in 2026. Each route and each run of the day are surveyed for both the weekday and weekend schedules. A total of 808 valid surveys were collected during the 2023 process (Route 17 was not in service during the survey).
- 3. In the 2020-2023 Title VI plan horizon, RVTD updated the Coordinated Human Services Public Transportation document, "United We Ride Plan 2021-2024". The planning process was unique because it was during COVID and no in-person meetings were being held. Instead, RVTD relied on a survey sent to human service agencies, employers, education institutions and agencies that primarily serve people with disabilities and low-income individuals. RVTD also incorporated plans pertinent to the UWR topic that were recently completed by area agencies just prior to the pandemic. This plan will need to be updated in 2024.
- 4. A Campus Master Plan kicked off in 2020 to assist RVTD with facilities, environmental review, and preparing plans for additional staff offices and ancillary buildings that support transit operations at the RVTD headquarters located at 3200 Crater Lake Ave. The first planning phase is complete and resulted in recommendation for a new 10,000 sf Transportation Office building. Funding for the project was secured in FFY 2021 through the Bus and Bus Facilities competitive program. Phase two has not begun but will include considerations for expanded fleet parking and a ZEB transition.

- 5. RVTD hoped to complete a strategic plan for Transportation Options, otherwise known as Transportation Demand Management. However due to COVID and the ongoing staff management and implementation of state and federal regulation this project was postponed. Unfortunately, RVTD has also been notified that TO funding may diminish in coming years due to changes in ODOT programming across the state of Oregon. RVTD has housed a TDM program for 30 years providing employer, school and residential based programs and subsidized transit passes. The program reaches youth, older adults, people with disabilities and LEP populations with travel training and other efforts to improve their mobility.
- 6. STIF 2023-2025 Plan- the state of Oregon requires transit providers to prepare and adopt a new STIF project list each biennium. RVTD prepared the 2023-2025 biennium plan in the spring of 2023 with implementation over the biennium. The first STIF plans included the four routes that have been added in recent years and are fully funded with STIF dollars. The current STIF plan includes additions to frequency and a new route in Central Point that are currently being planned.
- 7. The 2040 Transit Plan transitions RVTD from a hub and spoke or pulse system to a network. Routes added in 2019 were away from the main hub in downtown Medford and have required staff to be creative with transfers. Instead of only allowing one transfer within a 90-minute period, RVTD now offers two transfers to be taken on the same ticket within a 90 minute period. This allows all passengers to complete a full one-way trip across the system. To better serve passengers at these new transfer sites, RVTD had hoped to complete a transfer center facilities plan that would identify real estate acquisition, public private partnerships and other transit center concepts to support the new routes. This effort was also postponed due to managing the effects of COVID. However one of the transfer sites at RRMC was greatly improved by the RRMC campus construction providing RVTD with an improved location.

iv. ANTICIPATED PLANNING ACTIVITIES 2024-2027

2024-2025	2025-2026	2026-2027
 UWR Plan Central Point service analysis Develop TDM campaign 	 STIF 2025-2027 Plan Implement TDM campaign focused on Hispanic/Latino 	 Triennial Onboard Passenger Survey Campus Master Plan Phase II
focused on Hispanic/Latino community	community	

v. ANALYSIS OF CONSTRUCTION PROJECTS

During the report period RVTD purchased a 12,000 sf building adjacent to the Front Street Station in downtown Medford. The building will be renovated beginning in the fall of 2023 to provide new space for RVTD's Administrative staff including the Executive staff, Finance, HR, IT, Planning and TDM personnel. The building also will provide a large community meeting room where RVTD's Board of Directors meetings will be held. This meeting room is conveniently located near RVTD's main hub for future community engagement activities. The project has been reviewed by FTA and received a categorical exclusion under NEPA. An architect and construction company are under contract to complete the renovations which include all ADA required state and local code design.

The Transportation Office building located on RVTD's main campus at 3200 Crater Lake Ave. has broken ground with construction to be complete by the end of 2024. This facility and an adjacent parking structure is part of the first phase of the campus planning process to accommodate planned growth in the transit system. The 10,000 sf building will house the Transportation department staff now at nearly 85 personnel. This building will have a public entrance primarily for employee recruitment and will not serve as the primary public interface for RVTD.

RVTD is familiar with and has used Chapter IV, Section 8, Guidance on Conducting an Analysis of Construction Projects, components a-f.

In 2021 RVTD completing a major ITS project to replace the CAD/AVL system on board fixed route buses. The vendor is Equans (owned by Ineo Systrans) and comes with enhancements such as LCD screen on board buses for next stop and route information in both English and Spanish, a higher quality stop enunciation system in both English and Spanish to the interior and exterior of the buses and enhanced GPS for mobile trip planning apps supported through Trillium Solutions. The features of the new system have greatly benefited RVTD's passengers, especially those with visual or hearing impairments and LEP.

RVTD has received STIF-D funding from ODOT to replace an approximate 300-foot stretch of sidewalk at Front Street Station (in front of the new Administration building). This stretch of sidewalk serves two routes and was granted by the City of Medford for permanent transit use in 2016. The sidewalk is cracked and has sections that are not ADA compliant. The funding will be used to renovate the sidewalk to have more tactile features and bus stop improvements while beautifying the area using tree planters and a mosaic design on the building. The project is expected to take place in 2024-2025.

vi. SERVICE STANDARDS

Pursuant to requirements set forth in the Federal Transit Administration's (FTA) Circular 4702.1B, RVTD must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. These service standards contained herein are

used to develop and maintain efficient and effective fixed-route transit service. In some cases, these standards differ from standards used by RVTD for other purposes.

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

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

A. VEHICLE LOAD

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

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

Vehicle Load Factor is monitored to ensure customer comfort and to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns. RVTD calculates Vehicle Load Factor by dividing the average passenger load on each route by the number of seats on the type of bus typically assigned to that route. RVTD calculates the number of seats available by the number of buses in service on the route each hour multiplied by the number of seats on the buses used for that route. RVTD has 30-foot (24 seats) and 35-foot (30 seats) buses currently in service. For example, the Route 10 uses 5 buses over its 120-minute trip length to provide 20 minute headways; each bus is a 35-foot vehicle providing 150 seats each hour of service. For this analysis RVTD used average daily ridership on each route during the first full week of October 2023. Vehicle Load Factor results are presented in the exhibit below.

TABLE 3. Vehicle Load by Route

Route	Weekday Load Factor	Saturday Load Factor
1X	0.43	N/A
2	0.46	0.37
10	1.22	1.04

17	0.29	N/A
21	0.58	N/A
24	0.37	0.50
25	0.35	0.23
26	0.24	0.29
27	0.32	0.46
30	0.44	0.47
40	0.81	0.83
60	0.72	0.47
61	0.40	0.30
63	0.48	0.21

Observations of the Vehicle Load by Route

The current passenger loads are acceptable in that every route except the Route 10 has seating available for passengers. The Route 10 was at 30-minute headways prior to 2016 and experienced severe capacity issues often seeing 75 people abord buses in the afternoons. RVTD added service to provide 20 minute headways to alleviate these issues. The average of 1.22 loads means all the seats are occupied and approximately seven passengers are standing but this assumes every passenger stays on the bus for the duration of the route which is likely not occurring.

B. VEHICLE HEADWAYS

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

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 30 minutes); service frequency is measured in vehicles per hour (e.g., two buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15-minute peak headways and 30-minute off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For example, a service

standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes that have the highest load factors.

RVTD calculates headway by determining the average length of time between buses on each route. Currently RVTD does not have a peak service time. The exception is the Route 10 which has 30-minute headways before 7:00AM and after 6:00PM weekdays. All other routes have the same headways throughout their service day. In the event a route regularly exceeds Vehicle Load Factor standards, RVTD will evaluate whether frequency on that route should be adjusted within the confines of existing or expected funding levels. Vehicle headways are presented in the exhibit below

TABLE 4. Vehicle Headways by Route

Route	Weekday Headway	Saturday Headway
1X	60	no service
2	30	60
10	20	30
17	60	60
21	60	no service
24	20	40
25	30	60
26	60	60
27	60	60
30	60	60
40	30	60
60	30	60
61	60	60
63	60	60

Observations of Vehicle Headways

RVTD has added five new routes since 2019 (Route 1X, 17, 26, 27, 63) with the minimum level of service at 60-minute headways. For a brief time Routes 26 and 27 were at 30-minute headways between September 2019 to March 2021 right before the COVID pandemic required RVTD to cut service. These two routes had the lowest ridership due to their recent implementation and the least impact to the community to reduce service to 60-minute headways. Other routes were also impacted by the COVID service cuts including removal of 1 hour of evening service systemwide, suspension of the Route 63 and 1X for brief periods of time until drivers could be retained.

Although it is common practice to begin new routes at 60-minute headways it has also caused a disproportionate number of routes in the system to be at this minimal level. Before 2019 and the addition of these routes, RVTD had 9 routes with 6 of them at 30-minutes or

better. Now at 14 routes these same 6 routes are still at their headways and the remainder of the system, more than half, are at a lower level of service.

RVTD does not have a policy for how to assign headways to routes due to cost, funding and performance monitoring being a major part of these decisions. However, RVTD generally views 60-minute headways as being a base level of service and 30-minute headways to be more typical of a good level of service and 20-minutes to be the highest level of service. Table 4 above indicates the routes with the basic level in orange, a good level in green and the highest level of service in purple.

It is due to this observation of the majority of routes being at a basic level of service that RVTD has decided the next service enhancement will be to bring Route 27 back to 30-minute (pre-COVID) service levels. The Route 27 as seen in Tables 1 and 2 has the highest Hispanic/Latino population of the entire system and the second highest ridership with those earning less than \$10,000. This decision will postpone the service enhancement in Central Point that will now be scheduled for 2024. As seen in the Planning Activities list, the Central Point route is being planned and several surveys and data are being collected in late 2023.

C. ON-TIME PERFORMANCE

On-time performance is described as follows by FTA circular 4702.1B: On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and Category measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed "on-time" window.

A bus is determined to be late if it arrives at its scheduled "time point" five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure. It is RVTD's goal to be on-time at least 95% of the time during off peak commute times and 90% of the time during peak commute times. Transportation staff regularly monitor on-time performance and counsel operators who consistently fail to meet on-time performance standards that are within their control. Discussions with bus operators are also used to identify vehicle scheduling issues which are corrected through service changes four times annually. On-time performance of each route are presented in the exhibit below:

TABLE 5. On-Time Performance by Route

Route 1X

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
100420	Ashland Hospital	91%	N/A
100450	Ashland Plaza	91%	N/A
100510	Southern Oregon University	93%	N/A
100570	Shop'n Kart	85%	N/A
1	Front Street Station	66%	N/A

Route 2

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
220030	Oakdale and Dakota	99%	100%
220080	Stewart and Columbus	98%	92%
220140	Hamilton and West Main	93%	92%
300130	Albertsons	87%	73%
300340	West Main Bi-Mart	94%	82%
300350	Thunderbird	95%	82%
220300	Medford City Hall	88%	82%
1	Front Street Station	95%	82%

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
170080	SOU's The Hawk	93%	N/A
170130	North Mountain Park	93%	N/A
100830	N Main St - South of Glenn	93%	N/A
170190	Ashland Hospital	87%	N/A
100420	Ashland Hospital	86%	N/A
170240	North Mountain Park	77%	N/A
170290	SOU's The Hawk	78%	N/A
100570	Shop'n Kart	80%	N/A
170010	Albertsons	80%	N/A

Route 10

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
100070	South Gateway - Walmart	100%	100%
100100	Harry & David Corporation	97%	98%
100180	Phoenix - Ray's Food Place	96%	98%
100270	Talent and Main	96%	93%
100370	Jackson Wellsprings	96%	91%
100450	Ashland Plaza	94%	90%
100480	Siskiyou Blvd & Sherman St	93%	71%
100510	Southern Oregon University	91%	71%
100540	Ashland and Walker	88%	53%
100640	Ashland Bi-Mart	91%	67%
100690	Siskiyou and Bellview	99%	96%
100760	Siskiyou and Palm	98%	98%
100790	Siskiyou Blvd & Sherman St	98%	96%
100810	Lithia and Oak	97%	96%
100880	Jackson Wellsprings	92%	76%
101010	Talent and Main	92%	74%
101100	Phoenix - Ray's Food Place	77%	35%
101160	Harry & David Corporation	79%	50%
101195	South Gateway - Walmart	81%	57%
1	Front Street Station	90%	83%

Route 21

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
610020	Medford Center	96%	N/A
610070	Biddle and McAndrews	81%	N/A
210090	Food 4 Less	73%	N/A
610490	Poplar Square	72%	N/A
610590	Medford Center	63%	N/A
1	Front Street Station	56%	N/A

Route 24

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
240070	East Barnett and Ellendale	97%	82%
240100	Black Oak and Siskiyou	96%	82%
240130	RRMC	100%	91%
240160	Juanipero and Olympic	98%	97%
240210	East Barnett and Murphy	100%	97%
240330	McDonalds	99%	97%
100070	South Gateway - Walmart	96%	88%

Route 25

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
250030	West Main and Hamilton	94%	100%
250070	Columbus and Stewart	88%	91%
250110	South Medford High School	93%	100%
250160	Stewart and Peach	97%	100%
250190	Oakdale and Dakota	98%	100%
1	Front Street Station	94%	100%

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
260220	Bonaventure	80%	96%
260240	North Medford High School	86%	96%
260260	Springbrook and Northbrook	89%	100%
600270	North Medford Walmart	91%	100%
260360	Kennedy Park	76%	58%
260390	North Medford High School	96%	96%
260420	Donahue Frohnmayer Park	96%	96%
260450	Ruhl Park	96%	96%
240130	RRMC	96%	100%

Route 27

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
270100	Thunderbird	89%	86%
250100	Orchard Home & Cunningham	44%	36%
270180	Thunderbird	36%	18%
400445	Northgate Shopping Center	100%	100%
270280	Providence Hospital	97%	91%
260420	Donahue Frohnmayer Park	96%	91%
270380	McAndrews Marketplace	73%	68%
400050	Rogue Valley Mall	73%	68%
400445	Northgate Shopping Center	100%	95%

Route 30

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
300090	Columbus and Main	87%	100%
300130	Albertsons	85%	95%
300150	Oak Grove Elementary	90%	100%
	C and 4th Street -		
300250	Jacksonville	83%	86%
300340	West Main Bi-Mart	86%	95%
300350	Thunderbird	89%	95%
1	Front Street Station	81%	95%

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
400050	Rogue Valley Mall	96%	100%
400130	Beall and Bursell	90%	89%
400190	Albertsons	87%	86%
400240	N 3rd St - South of 10th St	78%	67%
400280	US Bank	82%	89%
400310	Albertsons	72%	72%
400360	Beall and Bursell	77%	78%
400445	Northgate Shopping Center	84%	86%
400447	Rogue Valley Mall	82%	86%
400470	Salvation Army	90%	97%
1	Front Street Station	86%	94%

Route 60

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
600040	Main and Crater Lake Avenue	97%	97%
600120	North Medford High School	97%	100%
600270	North Medford Walmart	97%	94%
600370	Cascade Shopping Center	87%	85%
600380	Goodwill	87%	67%
600400	VA SORCC	85%	70%
600470	Aloha Sun	81%	52%
600600	Cascade Shopping Center	88%	85%
600700	North Medford Walmart	90%	88%
600760	North Medford High School	86%	79%
600840	Main and Crater Lake Avenue	88%	85%
1	Front Street Station	88%	88%

Route 61

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
610120	Poplar Square	84%	97%
610140	Airport	67%	92%
610270	RCC Table Rock	53%	56%
600600	Cascade Shopping Center	49%	64%
610270	RCC Table Rock	46%	56%
610140	Airport	45%	67%
610490	Poplar Square	71%	83%
1	Front Street Station	60%	78%

Timed Stop	Stop Name	Weekday % on Time	Saturday % on Time
600380	Goodwill	99%	100%
630010	Shasta and Alta Vista	97%	100%
630060	Royal and Main	97%	100%
630090	Crystal and Teakwood	97%	100%
630120	City Hall	99%	100%
630130	Eagle Point Walmart	99%	100%
630140	City Hall	95%	100%
630170	Crystal and Teakwood	92%	100%
630200	N Royal Ave and Main	93%	100%
600600	Cascade Shopping Center	93%	100%

Observations of On Time Performance

RVTD has 127 'timed stops' throughout the system on weekdays and out of these 59 stops are showing less than a 90% schedule adherence or 47% of stops. The routes with the worst schedule adherence are Routes 21 and 61 which serve similar areas in north Medford. RVTD is currently examining service changes that will affect the Route 61 with the Central Point service enhancement scheduled for 2024. Routes with the best weekday schedule adherence are Routes 2, 10, 24, 25 and 63. On Saturdays, 48 out of 107 stops (three routes are not in service Saturdays) are showing less than a 90% schedule adherence or 45% of stops.

Due to the percentage of stops being nearly the same between weekdays and Saturdays it could be argued that the lateness to stops is not due to differing traffic patterns or congestion but the service needs to be altered to provide better reliability for passengers. Further analysis will be conducted beyond one week's worth of data to verify the accuracy of this information.

RVTD offers trip planning and next-bus-arrival information through mobile apps and on google and safari maps for passengers to get expected wait times and lateness of buses.

D. SERVICE AVAILABILITY

Service availability/transit access is described as follows by FTA Circular 4702.1B: Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distance might be a shorter distance than it would be in less densely populated areas, and the percentage of the total population within a one-quarter mile walk of routes or lines might be higher in more densely populated areas than it would be in less densely populated areas. Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.

Service availability compares the distribution of populations within ½ mile of a transit route compared to the region, in this case Jackson County. Populations for Title VI purposes are defined as low income and minorities. RVTD measures service availability using the Remix transit planning tool. ODOT provides a license for all transit agencies in the state of Oregon. RVTD has used this tool for several years and more recently for analyzing demographic date with transit planning decisions.

Although the 2020 Decennial Census was completed three years ago, there still remains a delay in certain data especially for smaller geographic analysis. There is 2021 ACS 5-Year Estimates available for Jackson County, OR for <u>Race and Ethnicity</u> and <u>Income</u> but not the

Medford-Ashland Metropolitan Statistical Area (the most recent being 2016). Therefore, the following service availability to Title VI populations is compared to Jackson County which covers all of RVTD's District territory. For context the County has 223,734 persons and RVTD's District has approximately 179,000 persons and there are no major cities (above 5,000 population) outside the RVTD District so it remains an accurate comparison to determine service availability.

The 2022 Federal Poverty Level for a two-person person household in the United States is \$18,310 at the 100% level and \$36,620 for the 200% threshold. The 2022 5-Year Estimates do not have a 100% threshold (it lists 50% and 125%). Therefore RVTD is using the Income in the past 12 months data for households earning less than \$15,000 and \$35,000. The average persons per household in Jackson County is 2.44 making the comparison to a 2-person household for the poverty threshold.

RVTD uses the Remix tool to identify service that is available to Title VI populations with the defined market capture distance of .25 miles around each route. Tables 4 and 5 below show the composition of minority population and low-income households within each of the boundaries.

TABLE 6. Title VI Populations within Jackson County versus 1/2 Mile of the System

System Area	Total Population Affected	Total Minority Population Affected	Percent Minority	Latino Minority*	Percent Latino	Percent Low Income Households 100%	Percent Low Income Households 200%
Jackson County	221,662	46,056	20.7%	30,368	13.7%	9.4%	28.3%
.25 mile around All Routes	91,200	21,888	24%	16,234	17.8%	17.2%	39.8%

Observations:

RVTD has approximately 91,200 people living within .25 mile of any route which is 41% of the County population. Yet, within this .25 mile more than half (54%) of the County's Latino minority population lives and slightly less than half (48%) of the County's minority populations live. Additionally, 15,686 households that live below the 100% poverty line are within .25 mile of an RVTD route compared to 20,836 throughout the entire County, resulting in 75.3% of these households living near transit. RVTD is required to use the 200% poverty threshold for ODOT STIF fund planning and this data also shows 62,730 households live within the County compared to 36,298 households living within .25 mile of transit. Again the majority of these households below 200% poverty level (57.9%) live close to transit.

TABLE 7. Title VI Populations within 1/2 Mile by Route

Individual Route	Total Population Affected	Total Minority Population Affected	Percent Minority	Latino Minority*	Percent Latino	Percent Low Income HH 100%	Percent Low Income Households 200%
1X	4,400	748	17.0%	304	6.9%	18%	40%
2	12,300	2,670	21.7%	1,427	11.6%	20%	45%
10	23,100	3,142	13.6%	9,937	7.5%	18%	42%
17	9,600	1,584	16.5%	912	9.5%	21%	41%
21	6,100	1,592	26.1%	714	11.7%	25%	52%
24	6,100	719.8	11.8%	360	5.9%	10%	30%
25	14,200	3,436	24.2%	1,548	10.9%	18%	43%
26	9,500	1,368	14.4%	665	7%	10%	25%
27	12,900	2,541	19.7%	1,251	9.7%	21%	44%
30	7,100	1,434	20.2%	589	8.3%	24%	50%
40	14,900	3,129	21.0%	1,743	11.7%	14%	39%
60	15,900	4,277	26.9%	2,910	18.3%	22%	45%
61	8,000	1,928	24.1%	888	11.1%	23%	47%
63	7,000	665	9.5%	322	4.6%	11%	31%

*The 2020 Census and recent ACS used two separate questions for race and ethnicity that collected data on Hispanic origins and race differently. Hispanic/Latino persons are under the White race as Hispanic ethnicity while all other race categories are separate.

To visualize the largest Title VI populations the cells shaded in blue are the top three in each category for either percentage or whole numbers. Routes 21 and 60 have four of the seven categories representing a higher than average Title VI population within .25 miles while Routes 10, 25, 30, 40 and 61 have two categories with a higher than average Title VI population.

In March 2023 RVTD completed an onboard survey. Onboard surveys are completed every three years (except for the 2021 electronic survey due to COVID). Each route and each run of the day are surveyed for both the weekday and weekend schedules. A total of 808 valid surveys were collected during the 2023 process (Route 17 was not in service during the survey). Below are key findings from the survey report that are pertinent to Title VI.

TABLE 2. Income by Route

Route	Less than \$10,000	\$10,000- \$14,999	\$15,000- \$24,999	\$25,000- \$49,999	\$50,000 or More	Prefer Not to Answer
1X	20%	8%	12%	48%	0%	12%
2	39%	19%	9%	9%	0%	24%
10	30%	17%	15%	9%	4%	25%
21	12%	18%	24%	29%	0%	17%
24	39%	6%	14%	0%	11%	30%
25	38%	8%	13%	9%	9%	23%
26	38%	0%	0%	25%	0%	37%
27	42%	8%	25%	0%	0%	25%
30	35%	35%	0%	6%	6%	18%
40	40%	9%	8%	7%	0%	36%

60	29%	11%	20%	15%	2%	23%
61	30%	16%	16%	24%	0%	14%
63	56%	11%	0%	0%	0%	33%
Total	32%	14%	14%	12%	2%	26%

Income by Route Observations

Income disparity continues to be a major issue for those using RVTD's transit system. In recent years wage growth nationwide and globally has benefited most sectors of the economy providing increases in personal income. However, RVTD's riders have seen an increase from 27% to 32% who earn less than \$10,000 annually from the prior Title VI Plan. Riders earning between \$10,000-\$15,000 also increased from 11% to 14% while there is a small dip in those earning between \$15,000-\$24,999 losing 2%. However an increase does occur for those earning between \$25,000-\$49,999 growing from 3% to 12%. Typically incomes below \$25,000 make up the majority of RVTD's riders and this recent data seems to indicate a slight shift to a higher income for a small portion of our riders.

vii. SERVICE POLICIES

RVTD adopted a service policy in 2006 which reads as follows:

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

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

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

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

VII. LIMITED ENGLISH PROFICIENCY (LEP) PLAN

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

AUTHORITY AND GUIDANCE

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

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

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

The following federal publications provide implementing guidance:

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

i. FOUR FACTOR ANALYSIS

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

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

FACTOR 1

The table below provides data on the total Hispanic/Latino population within Jackson County from the <u>ACS 2017-2021 5-year estimates</u>.

TABLE 8. Jackson County ACS Data Race Estimates

Race and Ethnicity	Percentage of County Population
White, percent (b)	94.6%
Black or African American alone, percent (a)	0.6%
American Indian and Alaska Native alone, percent (a)	0.7%
Asian alone, percent (a)	1.2%
Native Hawaiian and Other Pacific Islander alone, percent (a)	0.4%
Some other race, percent	0.3%
Hispanic or Latino, percent (b)	13.7%

- (a) Includes persons reporting only one race
- (b) Hispanics may be of any race, so are also included in applicable race categories

The 2017-2021 ACS data for Language Spoken at Home provides the data for the Factor 1 analysis. Of the total 221,662 Jackson County population, the estimated population who are Hispanic/Latino and speak Spanish but speak English less than very well is 2,287. There 30,368 persons of Hispanic/Latino ethnicity living in the County which results in 7.5% of this population speaking English Less than well.

Remix analysis shows us that within .25 mile of RVTD's transit system 2,413 persons of Hispanic/Latino origin do not speak English very well. There are 16,234 Hispanic/Latino persons living within that .25 mile resulting in 14.9% of this population needing language assistance.

Of those who speak other languages than Spanish and do not speak English very well there are approximately 588 individuals within the County. The Census provides further analysis on which ethnicities these may are but not the specific language. An estimated 487 persons of Indo-European origin and 723 of Asian or Pacific Island origin make up this population. (The margins of error for this section range from +- 111 to +- 525 which is why the totals are not 588 individuals). Remix shows us that within .25 mile of transit persons who do not speak English well and are not Hispanic/Latino identified as white alone (2.6%), Asian (0.5%), some other race (0.5%) and Native American and Alaskan Native (0.1%). This is enough of an indicator that there are other language assistance tools RVTD may need to consider as we encounter languages spoken other than Spanish. The I Speak card is available to all customer service agents to assist with identifying these other languages.

FACTOR TWO

1. In March 2023 RVTD completed an onboard survey. Onboard surveys are completed every three years (except for the 2021 electronic survey due to COVID). Each route and each run of the day are surveyed for both the weekday and weekend schedules. A total of 808 valid surveys were collected during the 2023 process (Route 17 was not in service during the survey). Below are key findings from the survey report that are pertinent to Title VI and the Factor Two analysis.

TABLE 1. Ethnicity by Route

Route	Asian	Black/ African American	Hispanic/ Latino	Native American	White	Other/ Prefer Not to Answer
1X*	0%	0%	12%	5%	78%	5%
2	0%	6%	10%	16%	62%	6%
10	2%	4%	4%	4%	76%	10%
21	0%	0%	12%	6%	76%	6%
24	0%	6%	11%	6%	60%	17%

25	0%	4%	29%	0%	63%	4%
26*	0%	13%	13%	0%	74%	0%
27*	0%	0%	50%	0%	42%	8%
30	0%	6%	12%	12%	58%	12%
40	0%	2%	6%	6%	77%	9%
60	4%	4%	3%	3%	70%	16%
61	10%	6%	10%	6%	60%	8%
63*	0%	1%	0%	0%	78%	1%
Total	2%	4%	12%	5%	65%	12%

^{*}Routes added since 2019

Ethnicity by Route Observations:

Overall ridership appears to have become more diverse with a drop from 68% to 65% in white riders. Compared to the 2021-2024 Title VI analysis for ethnicity by route there is a slight increase in overall Hispanic/Latino representation across the transit system (10% versus 12%) however certain routes saw significant changes in this ethnicity. For example, the Route 10 decreased from 11% to 4% and the Route 40 decreased from 14% to 6%. The 2020 Almeda fire disaster which destroyed more than 3,000 homes, the majority of which housed low income and more diverse residents, likely drives the change in the Route 10 ridership which serves this area. It is unclear why the Route 40 has changed however. Routes that have the largest Hispanic/Latino usage are newer routes including Route 27 (added in 2019) with 50% and Route 25 (added in 2017) with 29%. Both of these routes serve west Medford and was observed during service planning to have a higher-than-average Hispanic/Latino population. This demonstrates RVTD's commitment to serving historically underrepresented communities of color.

Similarly Black/African American dropped on Route 10 while the Route 24 rose from 4% to 6% and the strongest ridership is on Route 26 at 13%. Both of these routes serve East Medford and have recent service enhancements with higher frequency and extent on the Route 24 and adding the Route 26 in 2019.

Riders who preferred not to answer stayed nearly the same at 12% compared to 13% previously but this makes it difficult to determine true ethnicity across the system with this gap in data.

FACTOR THREE

RVTD is the only public transportation provider in Jackson County. RVTD provides an average of 850,000 trips per year and operates Monday through Friday between 5:00am to 8:00pm and Saturday 7:00am to 6:00pm. The transit service is an effective way to get to employment, medical appointments, shopping trips and higher education. The majority of passengers are low-income and do not own a vehicle, making transit a dependable transportation option.

FACTOR FOUR

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

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

- Translate "vital documents" into Spanish and, if necessary, replace text with pictograms or universal icons if economically feasible.
- Subscribe to a translation service to assist call takers and other staff in communicating to customers by patching through a linguistic specialist.
- Notify the Spanish-speaking population of the availability of free translation and interpretation services, upon request, for non-vital but important documents and information.
- Identify service changes that affect areas with high concentrations of LEP persons and develop mitigation strategies.
- To develop programs and materials to educate both community leaders who serve Spanish speaking LEP populations and LEP community members about RVTD's services and programs.
- Contact LEP partners to determine culturally appropriate travel-training materials and contact methods for members of their specific communities.
- Using input from community leaders, develop and provide customer orientation to familiarize transit coordinators at community centers and LEP customers with all RVTD services and programs.
- Gather community input for designing new pictograms to replace the text in signage where possible.

To educate RVTD staff regarding LEP programs and policies:

- Work with the Operations Department Transportation Trainer to improve bus operator training programs related to transporting and communicating with LEP customers.
- Provide staff with translation service information to have available near all phones.
- Ensure the I Speak card is available to all customer service personnel and understand how to use the tool when communicating with someone with Limited English.

ii. <u>LEP PARTICIPATION</u>

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

To research which Indo-European languages are primarily spoken in Jackson County (2.6% of White alone are LEP). This will be difficult as we have not received complaints or heard from community organizations about the lack of translated materials for Indo-European languages. To research the possible languages RVTD will begin by asking other transit agencies in Oregon and Northern California if they have similar data or encounters. RVTD will also ask Health organizations such as Oregon Health Authority and Community Care Organizations if they have similar data or encounters. At this stage RVTD is only trying to identify which languages we may need to translate vital materials into but will not translate materials in other languages except Spanish.

<u>Primary Target Audience</u>: Latino community members whose primary language is Spanish and have limited English proficiency. Members of this group vary in age, education, and income. However, they tend to live in urban or suburban settings, have access to RVTD services, have low incomes, and are transit dependent. Ridership patterns include men and women commuting to work and school, men and women taking children to school and medical appointments, youth riding to school and jobs, and the elderly going to medical appointments and social activities.

<u>Secondary Target Audience</u>: Recent immigrants from rural areas of Mexico, Central America, and South America.

Internal: RVTD management and staff needing to communicate with the Spanish-speaking LEP community regarding existing service, service changes and future service plans.

External: Spanish-speaking LEP communities; community-based organizations (CBOs) serving Spanish-speaking LEP populations; English language course teachers; and state, county and city governments serving Spanish-speaking LEP populations.

Program Elements

Outreach – External Stakeholders:

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

Outreach – Internal Stakeholders:

- Employee training
- Communications to the RVTD Board of Directors

Media -

- Include Spanish translated campaigns promoting RVTD when financially feasible.
- Place advertising in the Caminos publication.

Planning Activities –

- Onboard Passenger survey will be translated into Spanish to provide an option for LEP Spanish speaking passengers.
- Service changes that are posted to the rvtd.org website and rider alerts within buses will be translated into Spanish for LEP Spanish speaking passengers.

Training – RVTD Employees and Contracted Service Employees –

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

Translation Service –

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

Recruit/Hire Bilingual/Bicultural Individuals –

• Place job announcements at the state employment office, in local newspapers, on RVTD's website, in e-mail notifications, and any other media used to attract potential employees who are bilingual (English/Spanish).

iii. LANGUAGE ASSISTANCE PLAN

Options for providing language assistance are:

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

Language Assistance Resources/ Translation of Vital Documents

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

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

MONITORING AND UPDATING THE LEP PLAN

This plan is designed to be flexible and change to the needs of the community. For example, in this planning preparation RVTD identified a growing number of Indo-European community members who are LEP and additional research will need to occur to identify which languages may be spoken other than English and Spanish. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons and it will be important to monitor changes in demographics and types of services as new census information becomes available.

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

VIII. TITLE VI INFORMATION DISSEMINATION

RVTD will post the LEP Plan, complaint procedures and complaint form on its website at www.rvtd.org. A copy of the Public Notice Concerning Title VI of the Civil Rights Act will

be posted in English and Spanish at the District's Front Street bus transfer station, in the receptionist lobby of the Administration and TransLink buildings, and on all District buses and Paratransit vehicles (Attachment B). Copies of the Title VI Plan will be provided to District staff and to any person or agency requesting a copy. LEP persons may obtain copies/translations of the plan upon request.

PROGRAM ELEMENTS – ACTION AND PRELIMINARY TIMELINE

2024	2025	2026
 Continue to evaluate and monitor existing plan (ongoing) Provide LEP "I Speak" card training to staff (ongoing) Research Indo-European languages spoken in Jackson County 	 Continue to monitor existing plan (ongoing) Incorporate LEP information into RVTD employee handbook Develop 2025-2027 STIF Plan using Title VI data 	 Continue to monitor plan (ongoing) Provide select advertising in Spanish

IX. TITLE VI COMPLAINTS

RVTD had no Title VI civil rights complaints during the current reporting period.

ROGUE VALLEY TRANSPORTATION DISTRICT (RVTD) NONDISCRIMINATION COMPLAINT PROCEDURES

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990 as amended, relating to any program or activity administered by RVTD or its sub-recipients, consultants and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

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

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

Procedures.

- 1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by title VI nondiscrimination provisions may file a written complaint within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s).
 - b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individual perceived as parties in the complained-of incident.
 - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for RVTD to be able to process it.
 - e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to RVTD for processing.

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

Title VI/ADA Complaint Form

Note: The following information is needed to assist in processing your complaint.

Complainant's Information:	
Name:	
Address:	
City/State/Zip:	
relephone Number (nome):	
Telephone Number (Work):	
Person Discriminated Against (someon	ne other than complainant):
Name:	
City/State/Zip:	
Telephone Number (Home):	
Telephone Number (Work):	
Which of the following best describes t	the reason you believe the discrimination took place:
Race/Color (Specify):	National Origin (Specify):
Gender/Age (Specify):	National Origin (Specify): Disability:
On what date(s) did the alleged discrin	nination take place:
Describe the alleged discrimination. Expresponsible (if additional space is needed	plain what happened and whom you believe was d, add a sheet of paper):

Title VI Complaint Form (cont.)

List names and contact info discrimination:	rmation of persons who may have knowledge of the alleged
Have you filed this complai state court? Check all that	nt with any other federal, state, or local agency, or with a federal or apply.
Federal Agency	Federal Court
State Agency Local Agency	State Court
Please provide information was filed.	about the contact person at the agency/court where the complaint
Name:	
Address:	
City/State/Zip:	
Telephone Number (Work)	:
Please sign below. You may relevant to your complaint.	y attach any written materials or other information that you think is
Complainant Signature	Date
Attachments: Yes	_ No
Submit form and any add	itional information to:
Rogue Valley Transportation	on District

Rogue Valley Transportation District Title VI Compliance Officer 3200 Crater Lake Avenue Medford, OR 97504-9075

Phone: (541) 779-5821 Fax: (541) 773-2877

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

<u>Título VI Formulario de Queja</u>

Nota: La siguiente información es necesaria para ayudar en la tramitación de su queja.

Información del Demandante:	
Nombre:	
Dirección:	dad
/ Estado / Código Postal:	
Número de Teléfono (Casa): Número de Teléfono Número de Teléfono	
(Trabajo):	
Persona discriminada (alguien que no sea demandante): Nombre:	
Dirección:	
Ciudad / Estado / Código Postal:	
Número de Teléfono (Casa): Número de Teléfono (Trabajo): Cuál de las siguientes opciones describe mejor la razón que usted cree que la discriminación tuvo lugar: Raza / Color (Especificar): Género / Edad (Especificar): Discapacidad:	
¿En qué fecha (s) ocurrió la supuesta discriminación llevará a cabo:	
Describa la presunta discriminación. Explique lo que ocurrió y quien considera que fue responsable (si necesita más espacio, agregue una hoja de papel):	

Título VI Formulario de Queja (cont.)

Lista de nombres e información de cont supuesta discriminación:	tacto de las personas c	ue puedan tener conocimiento de la
¿Ha presentado esta queja ante cualque o estatal? Marque las que corresponda		al o local, o ante un tribunal federal
Agencia Federal para el Tr	ribunal Federal de Agencia Local o	Agencia Estatal de la le
Sírvanse proporcionar información sob donde se presentó la queja.	ore la persona de cont	acto en la corte de la agencia /
Nombre:		
Dirección:		G: 1.1/
Estado / Código Postal:		Ciudad /
Número de Teléfono (Trabajo):		
Por favor firme abajo. Usted puede adj información que considere relevante pa	<u>-</u>	rial escrito o cualquier otra
Demandante Fecha Firma Archivos ad	juntos: Si No)
Envíe el formulario y cualquier otra inf Rogue Valley Transportation District Título VI Compliance Manager 3200 Crater Lake Ave. Medford, OR 97504-9075 Teléfono: (541) 779-5821 Fax: (541) 77		

EXHIBIT B



ROGUE VALLEY TRANSPORTATION DISTRICT

Public Information Concerning <u>Title VI of the Civil Rights Act of 1964 and the Americans with</u> <u>Disabilities Act (ADA) of 1990, as amended</u>

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

The following examples, without being exhaustive, illustrate the application of the nondiscrimination provisions of certain Department of Transportation operating administrations.

• Any person who is, or seeks to be, a patron of any public vehicle which is operated as a part of, or in conjunction with, a project shall be given the same access, seating, and other treatment with regard to the use of such vehicle as other persons without regard to their race, color, national origin, or disability.

Title VI / ADA information and documents are available on the District's website at www.RVTD.org or upon request by calling (541) 779-5821 or at the Administrative Offices located at 3200 Crater Lake Ave. Medford, OR.

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color national origin, or disability by Rogue Valley Transportation District (RVTD) may file an administrative complaint with RVTD under Title VI of the Civil Rights Act of 1964 or the Americans with Disabilities Act (ADA) of 1990. If the complaint is not resolved satisfactorily by RVTD, individuals may file a complaint with the FTA Office of Civil Rights. Information is available at http://www.fta.dot.gov/civil_rights.html.

UPDATED 6/20/2018

EXHIBIT B (Spanish Version)



ROGUE VALLEY TRANSPORTATION DISTRICT

Información Pública en relación a Título VI del Ley de Los Derechos Civiles de 1964 y la Ley de Estadounidenses con Discapacidades (ADA), versión modificada

Rogue Valley Transportation District (RVTD) es el recipiente de financiamiento federal para proporcionar transporte público. RVTD opera programas en acuerdo con los requisitos de no discriminación bajo Título VI y ADA.

Los siguientes ejemplos, sin ser exhaustivos, ilustran el uso de las provisiones de no discriminación de cierto Departamento de Transportación funcionamiento administraciones.

• Toda persona que sea, o intenta ser, un patrón de cualquier vehículo público de quien se funcione como parte, o juntamente con, un proyecto será dado el mismo acceso, asientos, y otro tratamiento con respecto al uso del vehículo tal como otras personas sin consideración de su raza, color, u origen nacional.

La información y los documentos del Título VI están disponibles en el sitio de web de RVTD en www.RVTD.org o a pedido si llames (541) 779-5821 o en la oficina administrativa de RVTD en 3200 Crater Lake Avenue, Medford, Oregon.

Individuos o organizaciones que creen que han sido denegado de las ventajas de, excluidas de la participación, o expuesto a discriminación sobre la base de la raza, del color o del origen nacional por Rogue Valley Transportation District (RVTD) puede entrar una queja administrativa con RVTD bajo Título VI del Ley de los Derechos Civiles de 1964 y la Ley de Estadounidenses con Discapacidades (ADA) de 1990. Si la queja no resulta en acción satisfactoria por RVTD, individuos pueden entrar una queja con la oficina de FTA de las derechas civiles (FTA: Office of Civil Rights). Información está disponible en http://www.fta.dot.gov/civil_rights.html.

UPDATED 6/20/2018

Exhibit C

	2004 Census Test Consus Language Identification Flashcard	
	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
	խողըում ենւը նչում կատարեք այս քառակուսում, հթե խոսում կամ կարդում ևջ Հայհրեն:	2. Armenia
	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্ষে দাগ দিন।	3. Bengali
	ឈូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយកាសា ខ្មែរ ។	4. Cambod
	Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorr
	如果你能读中文或讲中文,请选择此框。	6. Simplifie Chinese
	如果你能讀中文或講中文,請選擇此框。	7. Traditiona Chinese
	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8.Croatian
	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
	Mark this box if you read or speak English.	11. English
	اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد.	12. Farsi
DB-3309	U.S. DEPARTMENT OF COMMERCE Economies and Statisties Administration U.S. CENSUS BUREAU	

	Cocher ici si vous lisez ou parlez le français.	13. French
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
	अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
	Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
	Marchi questa casella se legge o parla italiano.	21. Italian
	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish
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	Assinale este quadrado se você lê ou fala português.	26. Portuguese
	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
	Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
	Marque esta casilla si lee o habla español.	31. Spanish
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
	Відмітьте що клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
	اگرآپاردوپڑھتے یابولتے ہیں تواس خانے میں نشان لگا کیں۔	36. Urdu
	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish
DB-3309	U.S. DEPARTMENT OF COMMERCI Economics and Statistics Administration U.S. CENSUS BUREAL	