

**Title VI Program**  
**of**  
**Valley Regional Transit**

The Regional Public Transportation Authority  
of Ada and Canyon Counties, Idaho  
updated October 2014

Submitted in Fulfillment of  
Title VI of the Civil Rights Act of 1964  
and  
FTA Circular 4702.1B (October 1, 2012)



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**Exhibits**

- Exhibit A Signed Annual Title VI Assurances
- Exhibit B VRT’s Notice to the Public
- Exhibit C Title VI Policy Statement
- Exhibit D Title VI Complaint Form
- Exhibit E Public Participation Plan
- Exhibit F Limited English-speaking Persons (LEP) Plan
- Exhibit G Sample Subrecipient Agreement
- Exhibit H Board Memo on Title VI Route Analysis and Designation
- Exhibit I Title VI Route Analysis and Designation
- Exhibit J Current Routes and Headways
- Exhibit K Bus Stop Location and Transit Amenities Guidelines
- Exhibit L Fixed Route System Map

## Introduction

This report documents the efforts of Valley Regional Transit (VRT), the regional public transportation authority of Ada and Canyon counties, to provide a level of transit service that is fairly distributed to all of the authority populations to the extent possible. The content and organization of this report is based on the guidelines of FTA Circular FTA C 4702.1B (October 1, 2012), —Title VI Requirements and Guidelines for Federal Transit Administration Recipients. Questions regarding the content or preparation of this report should be directed to Kelli Fairless, VRT Executive Director.

## Annual Civil Rights (Title VI) Assurances

VRT enters the annual Certification and Assurances into TEAM each year and provides an electronic signature through a personal identification number (PIN). Attached as **Exhibit A** is a signed copy for the Annual Civil Rights Title VI Assurances. VRT executive director will sign a hard copy each year going forward.

## Title VI Complaint Procedures

VRT has developed complaint procedures for filing, investigating and tracking Title VI complaints filed against the authority. VRT's complaint procedure is available on the Web and on the revenue service vehicles, and in public view at capital facilities.

The complaint procedures are as follows:

Any person who believes that he or she has been excluded from participation in or denied the benefits of VRT's programs, activities or services due to discrimination, may file a complaint with VRT within 180 days from the date of the alleged discrimination. VRT encourages use of its complaint form which is available on the VRT Website at

<http://www.valleyregionaltransit.org> or by calling 208-345-7433.

There are several ways to file a complaint:

**By mail** addressed to:

Title VI Coordinator  
700 NE 2<sup>nd</sup> St Suite 100  
Meridian ID 83642

**By fax** addressed to: Title VI Coordinator, 208-846-8564

**By email** to [TitleVICoordinator@valleyregionaltransit.org](mailto:TitleVICoordinator@valleyregionaltransit.org)

Once a complaint is filed, the VRT Title VI Coordinator will record the complaint in a database and an investigator will be assigned. There are no strict guidelines for investigating a complaint. The investigator may interview any individuals named as witnesses and any other individuals who may have information. The investigator may review relevant documentation. Failure of the

complainant to respond to requests for information from the investigator may result in closure of the complaint.

Although VRT strives to promptly resolve complaints, this process will differ depending on the complexity of the complaint, the individuals involved, and other factors. The complainant will receive a final written response to the complaint, which shall be reviewed and approved by the VRT Management Committee.

### **Title VI Complaint to the U.S. Department of Transportation**

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to the discrimination on the grounds, of race, color or national origin may submit a complaint to the U.S. Department of Transportation:

#### **Federal Transit Administration's Office of Civil Rights**

Attention: Title VI Program Coordinator

East Building, 5th Floor-TCR

1200 New Jersey Ave, SE

Washington, DC 20590

Further information, including the complaint form, is available at [www.fta.dot.gov](http://www.fta.dot.gov)

The notice to the public and instructions is attached as **Exhibit B**.

Title VI Policy Statement **Exhibit C**.

The complaint form is attached as **Exhibit D**.

## **Title VI Investigations, Complaints and Lawsuits**

VRT's data related to allegations of discrimination, both with respect to employment and in the provision of transit services, comes from several sources. The data includes customer reports, reports to federal and state regulatory agencies, lawsuits filed in federal, state or local courts, and internal employee complaints.

### **Customer Reports**

Customer complaints are collected from the public through VRT's customer call center at 208-345-RIDE (7433). The call center is supported by VRT's Customer Service Department. Calls are tracked in Service Desk, a module of VRT's Fleet-Net information management system. Each complaint is assigned a unique tracking number and tracked by the Customer Service Coordinator through the resolution of the complaint.

VRT received no Title VI related complaints from a customer during the report period.

### **Employee Reports**

VRT received no Title VI related complaints from current or former employees during the report period.

## Summary of Title VI Compliance Reviews

No compliance reviews were conducted during the reporting period.

## Public Participation

VRT's Public Involvement Policy outlines the agency's process for soliciting and considering public comment prior to implementing fare changes, service changes or adjustments or adoption of, or modifications to, the VRT annual budget. A minor service adjustment is defined as any action that reduces service hours and/or service miles by less than 10 percent of the entire system, or results in time point changes. A major service adjustment is defined as any action that increases or decreases service hours and/or miles by at least 10 percent of the entire system. A public hearing and comment period are mandatory for any fare changes.

In the effort to get meaning full input from the entire public, including minority and low income populations VRT will hold a series of open houses, public meetings and/or public hearings and advertise the outreach to and with advocacy groups and social service agencies in an effort to reach affected populations.

VRT had no major service adjustments or fare changes during the report period.

The Public Involvement Policy is attached as **Exhibit E**.

## Regional Coordination Council (RCC)

The RCC supports the VRT governance process by advising the Board through a forum for transportation and human service stakeholders and advocates centered on sharing information and collaborating on mobility issues. The members of the RCC are composed of key representatives from human service and transit providers in the following categories:

- a. Blind/visually impaired
- b. Transit consumer
- c. Vocational/labor
- d. Housing
- e. Non-emergency medical transport
- f. Neighborhood associations
- g. Statewide coordination
- h. Urban transportation provider
- i. Rural transportation provider
- j. Limited English proficiency (LEP)**
- k. Educational programs
- l. Older adults
- m. Local governments
- n. Employers
- o. Low income families and individuals**
- p. Persons with disabilities

- q. Veterans
- r. Health and Welfare

The RCC, which meets quarterly, formulates and reviews policies, services and programs that affect groups represented on the RCC. Recommendations on policies, services and programs shall be submitted to the VRT Board for final action.

## Limited English-speaking Persons (LEP) Plan

### Language Assistance

VRT customer service (Rideline) utilizes LanguageLine Solutions ([www.language.com](http://www.language.com)) for translation services in the occasion that a customer calls in as is not able to communicate with one of our customer service specialists. Rideline also employs a one full time position that is designated as a Bilingual Customer Service Specialist and must be fluent in both English and Spanish. Based on 2010 Census data, in VRT's two county service area, Spanish/Spanish Creole is the language category with the highest representation with 8.5% of residents speaking this language. All other language subcategories comprise 3.8% of the residents.

### Limited English-speaking Persons (LEP) Plan

VRT has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to VRT services as required by Executive Order 13166. This plan adopted in 2012 details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan while determining VRT's extent of obligation to provide LEP services, VRT undertook a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the VRT service area who may be served or likely to encounter VRT service; 2) the frequency with which LEP individuals come in contact with VRT services; 3) the nature and importance of the program, activity or service provided by VRT to the LEP population; and 4) the resources available to VRT and overall costs to provide LEP assistance.

The LEP plan is attached as **Exhibit F**.

## Subrecipients

VRT currently has one subrecipient that operates service, Treasure Valley Transit(TVT). VRT's contract with TVT is a purchase of service agreement to operate demand response services utilizing formula grants 5310 and 5307 for the cities of Eagle and Meridian Idaho, respectively.

The Title VI language of the subrecipient agreement is attached as **Exhibit G**.

## Route Demographic Analysis and Designation

In 2012 VRT staff conducted a demographic analysis of the populations served by each route. The purpose of the project was to identify which fixed routes served areas with greater than system average rates of minority and/or low income populations. Staff will use this analysis and designation to determine if any route, schedule, or vehicle allocation procedure changes will be compared to the baseline to determine if it has a disproportionate impact on low income and minority populations.

The staff memo to the VRT board of directors is attached as **Exhibit H**.

The route designation is attached as **Exhibit I**.

## SERVICE STANDARDS

### Vehicle Load

Vehicle Type	Length	Number of Vehicles	Seated	Standing	Max Load Factor
New Flyer Bus	35'	13	30	13	1.4
AeroTech	28'	3	20	8	1.4
Allstar	28'	5	20	8	1.4
AeroTech	28'	5	20	10	1.5
Gillig	40'	8	38	19	1.5
Gillig	35'	1	32	16	1.5
Gillig	40'	2	38	19	1.5
Gillig	35'	7	32	42	2.3
Phoenix	26'	3	21	10	1.5
ElDoradoAerotech	33'	4	24	12	1.5

### Vehicle Headway

VRT categorizes its existing and planned service by type of service and vehicle headway or frequency. These categories help planners establish the appropriate level of service throughout the service area. The categories are as follows.

SERVICE CATEGORY	FREQUENCY	SERVICE PERAMETERS
Premium Service	15 – 30 minute all day	Dedicated right of way limited stops
Express Service	15 – 30 minute peak 30 – 60 minute mid-day	Limited stops

Employer Express Service	30 minute peak No service mid-day	Limited stops To specific employment sites
Primary Service – frequent stops	15 – 30 minute peak 30 – 60 minute mid-day	Frequent stops
Secondary Service – frequent stops	30 – 60 minute all day	Frequent stops
Rural Service	60 minute all day	Frequent stops
Flex Route Service	Up to 60 minutes all day	Route deviation

The level of service categories of current routes were determined by vehicle load, population density, activity centers, previous ridership and funding availability. VRT’s valleyconnect plan and the Community Planning Association of Idaho’s Communities In Motion plan identify the planned service category for existing route. These plans also identify the service levels planned for new routes. These determinations were made by modeling future growth and traffic. VRT will assess vehicle headway any time the vehicle load standard has been exceeded or any time there is a change in funding availability and will use the following criteria to prioritize frequency improvements.

- 1) Current vehicle load
- 2) Current service category of the route currently compared to its planned service category
- 3) Degree the route serves low income and minority populations compared to other routes
- 4) Population level changes
- 5) Activity centers that have moved into or out of the service area
- 6) Financial implications
- 7) Service implications

Current Route Headways are attached as **Exhibit J**.

### **On-Time Performance**

VRT tracks and report on-time performance by service on a monthly basis. If driver and/or customer comments indicate that a route is consistently late, the analysis may be done prior to the scheduled date. On-time performance will be expressed as the ratio of trips a route is on time to the total number of trips. Timepoints are randomly sampled by supervisory personnel. A vehicle is considered on-time if it leaves a timepoint no earlier than the latest published schedule, and no later than 5 minutes than the published time. A route will be considered on-time if actual time checks are within scheduled time 75 percent of the time. Late trips due to vehicle breakdowns will not be considered in the on-time calculation.

### **Service Availability**

VRT’s guideline for establishing service availability is 70% of its service based on ridership and demand and 30% of its service based on serving the transit dependent populations. VRT uses the industry standard of ¼ mile walking distance when assessing what area a route serves and



how far customers can travel to a bus stop. Initial stop locations on primary, secondary and flex route services are identified using the ¼ mile walking standard. Exact stop placement may be adjusted from this target location based on destinations, passenger safety, bus safety, vehicle safety or site restrictions. Within downtown areas, the service standard is to have stops every two blocks. Stop locations on premium, express, employer express and rural services are typically park & rides and therefore are not assessed using the ¼ mile walkability standard.

### **Vehicle Assignment**

The primary factor for vehicle assignment is ridership demand. Larger buses are assigned to routes with higher ridership and smaller buses are assigned to routes with lower demand. In most cases, a vehicle runs a route all day, so the peak period demand dictates the size of vehicle needed. Within these size categories, buses are rotated daily to different routes so that mileage and vehicle wear and tear is evenly distributed throughout the fleet. There is no consideration given to the age or condition of the vehicle when assigning it to a route. Given the relatively small size of VRT's fleet, each bus within a size category will run each route within a month's time, thereby eliminating any difference in quality of vehicle to a particular route or population. All VRT fixed route vehicles are lift equipped and bike rack equipped, so all routes and populations have equal access to these amenities. Additionally, all VRT fixed route vehicles are equipped with security cameras with audio, so no routes or passengers are provided with a lesser amount of security.

## **Distribution of Transit Amenities**

Transit amenities for the VRT system include, but are not limited to, ADA accessible bus stops, benches, shelters, bike racks, bike lockers, transit centers, schedules, system maps, intelligent transportation systems, language proficiency measures and travel training. VRT implemented a fixed bus stop program in 2009. Prior to that, a flag-stop system was used. VRT has been working since then to implement transit amenities at fixed bus stops.

**Exhibit K** is VRT's Bus Stop Location and Transit Amenities Guidelines in full.

### **ADA Accessible Bus Stops**

VRT's service standard is to provide, at a minimum, landing pads at all bus stops. Where funding and right-of-way allow, VRT will also improve sidewalks and pedestrian ramps. VRT recently initiated a program to upgrade bus stops to meet ADA recommended standards. VRT conducted an analysis of all current bus stops using the following factors to prioritize which bus stops should receive ADA enhancements and to determine what enhancements to implement.

- 1) Stop usage
- 2) Number of routes serving stop

- 3) Existing condition of stop
- 4) Need to acquire right of way (ROW) to make necessary improvements
- 5) Improvements already planned by local and state jurisdictions
- 6) Density of elderly population in area
- 7) Density of low income population in area
- 8) Density of minority population in area
- 9) Nearby destinations
- 10) Walk-ability to the bus stop
- 11) Pedestrian safety concerns

Stops serving elderly, low income and minority origins and destinations were weighted higher, therefore receiving higher priority. With the completion of the study, VRT has been implementing the suggested modifications to the transit amenities at the fixed stops. . This work is being done with one time funding from the American Recovery and Reinvestment Act (ARRA). VRT will use its ongoing federal transit enhancement funds to continue this work.

### **Benches**

The VRT service standard is to have a bench at every stop that has enough right-of-way (ROW) to allow for a bench and to meet ADA clearance requirements. If the ROW is limited, ADA clearance standards take priority and a bench may not be able to be located at that stop. In 2010, VRT contracted with an external vendor to furnish, install and maintain benches at all feasible bus stops.

The vendor installs benches where advertising has been sold first and installs benches at other feasible sites as a second priority. If a specific need is identified by drivers or customer comments, based on the stop usage or demographics of the population using a stop, VRT may request that a bench be installed at a particular stop prior to advertising being sold.

### **Shelters**

The VRT service standard for shelters is to have a minimum of two (2) passengers boarding or off boarding at a stop on average each time the bus stops at that location. The number of passengers using each stop comes from the NTD survey sampling conducted by VRT on an on-going basis. VRT currently has shelters at 48 of its 863 stops and has funding and plans to install new and replacement shelters at 41 additional existing bus stops. VRT will continue to use its ongoing federal capital enhancement funding to place shelters at qualifying stops.

### **Bike Racks**

The VRT service standard is to have three-bike bike racks on all large buses and two-bike bike racks on all small fixed line buses. VRT currently has bike racks on all fixed line buses.

### **Schedules**

The VRT service standard is to provide schedules on buses and at outlets throughout the region. Outlets are selected based on the location and availability of the facility to the general public. There is no charge for the schedules. Currently, VRT schedules are distributed at approximately 20 outlet locations that also sell bus passes and tickets and at 64 locations that provide bus information only. Schedule information for appropriate routes is also on the buses.

VRT posts all schedule information, including maps and times, on its website. The VRT service standard also calls for providing the schedule information in large type on the website and providing translation services upon request. Detailed routing information, including left/rights, is also provided on the website.

### **System Maps**

The VRT service standard is to provide a system map and customer service number on all bus shelters and major transfer locations. **Exhibit L** is an example of the system map provided at all bus shelters.

### **Determination of site of location of facilities:**

Valley Regional Transit analyzes construction impacts through the Federal Environmental Impact Statement, Environmental Assessment, or Categorical Exclusion processes to assess the effects on minority and low income populations, including mitigation of impacts on businesses and households, and ensuring affected minority and low-income communities are included in decision making processes.

During this report period VRT completed the purchase of an existing facility in Canyon County to retro fit as a maintenance, storage and operations center for the services based out of that county. The Happy Day Transit Center located at 5807 Cleveland Boulevard Caldwell.