



## TITLE VI PROGRAM

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*City of Loveland*

*Title VI Program*

*Submitted:*

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## INTRODUCTION

### COLT's Commitment to Civil Rights

This City of Loveland Transit's (COLT) Title VI Program has been prepared to ensure that the level and quality of COLT's fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to COLT's riders and other community members. Additionally, through this program, COLT has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that COLT is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of COLT's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).



*"No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.*

*Civil Rights Act of 1964*

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), COLT has an obligation to ensure that:

- The benefits of its bus services are shared equitably throughout the service area;
- The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in COLT's service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefitting a community not disproportionately allocate adverse environmental and health burdens on the community's minority population; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

This program contains all of the elements required of a transit provider operating in an urbanized area of 200,000 or more in population and operating less than fifty vehicles in peak service. It has been prepared using data from the most recent (Year 2010) U.S. Census.

## GENERAL REQUIREMENTS

### Notice to the Public

To make COLT's riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, COLT will place the following statement, in both English and Spanish, on its website, on posters in each bus and in brochures.

## YOUR CIVIL RIGHTS

**City of Loveland Transit (COLT) operates its programs and services without regard to race, color, national origin, or creed in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with COLT. For more information on COLT's civil rights program and the procedures to file a complaint, please contact 970-962-2372; email [TitleSix@cityofloveland.org](mailto:TitleSix@cityofloveland.org) or visit our Human Resource office at: 500 E 3rd, Loveland, CO 80537 from 8:30 am to 4:30 pm Monday through Friday. For more information about COLT programs and services, visit [www.cityofloveland.org/transit](http://www.cityofloveland.org/transit). If information is needed in another language, please visit the COLT offices at 105 W. 5<sup>th</sup> Street, Loveland, CO 80537 from 8:00 am to 5:00 pm Monday through Friday.**

## Discrimination Complaint Procedures

COLT has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, national origin, or creed, by COLT may file a Title VI complaint by completing and submitting the agency's Title VI Complaint available at the City of Loveland, 500 East Third Street, Loveland, CO 80537 or on our website <http://www.cityofloveland.org/index.aspx?page=178>

## The Procedure

The following procedures cover complaints filed under Title VI of the Civil Rights Act of 1964 for alleged discrimination in any program or activity administered by COLT.

These procedures do not affect the right of the Complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. 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 COLT may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a written complaint and send it to the following:

Title VI Coordinator  
City of Loveland  
500 East Third Street  
Loveland, CO 80537  
Phone: (970) 962-2372  
Email: [TitleSix@cityofloveland.org](mailto:TitleSix@cityofloveland.org)

Complaints may also be filed with the Federal Transit Administration's Office of Civil Rights no later than one-hundred eighty (180) calendar days after the date of the alleged discrimination at 1200 New Jersey Avenue SE, Washington, DC 20590.

The following measures will be taken to resolve Title VI complaints:

1. A formal complaint must be filed within one-hundred eighty (180) calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the Complainant's name, address and telephone number; name of the alleged discriminating person(s), basis of complaint (race, color, national origin), and the date of the alleged act or acts. A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. A copy of the form can be found on the City of Loveland website listed above or may be requested by writing to the Title VI Coordinator at the physical or email address listed above. COLT Transit encourages individuals to submit Title VI complaints in writing using this form and mailing to:

City of Loveland  
Attn.: Title VI Coordinator  
500 East Third Street  
Loveland, CO 80537

2. In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the City of Loveland Title VI Coordinator. Under these circumstances, the Complainant will be interviewed, and the Coordinator will assist the Complainant in converting the verbal allegations to writing.
3. When a complaint is received, the Coordinator will provide written acknowledgment to the Complainant within ten (10) calendar days by registered mail.
4. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided sixty (60) calendar days to submit the required information. Failure to do so may be considered good cause for a determination that the complaint has no investigative merit.

5. Within fifteen (15) calendar days from receipt of a complete complaint, the City of Loveland will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) calendar days of this decision, the Title VI Coordinator or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
  - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - b. If the complaint is to be investigated, the notification shall state the grounds of COLT's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting in the investigation.
6. When COLT does not have sufficient jurisdiction, the Title VI Coordinator or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
7. If the complaint has investigative merit, the Title VI Coordinator or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Title VI Coordinator within sixty (60) calendar days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.
8. The Title VI Coordinator or his/her authorized designee will issue letters of finding to the Complainant and Respondent within ninety (90) calendar days from receipt of the complaint.
9. If the Title VI Coordinator's final response does not satisfactorily resolve the matter, the Complainant or Complainant's authorized representative may appeal the decision of the Title VI Coordinator, in writing, to the City Manager, City of Loveland, 500 East Third Street, Loveland, CO 80537. The Complainant shall file his or her appeal, including a detailed description of its basis, no later than thirty (30) calendar days after the date of the Title VI Coordinator's final written response.



# Title VI Civil Rights Complaint

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City of Loveland  
Attn: Title VI Coordinator  
500 East Third Street  
Loveland, CO 80537  
970-962-2372

**Instructions:** To Submit a Title VI complaint to City of Loveland Transit, please print and complete the following form, sign and return to: City of Loveland, Title VI Coordinator, 500 East Third Street, Loveland, CO 80537 or email to [TitleSix@cityofloveland.org](mailto:TitleSix@cityofloveland.org). For questions or a full copy of City of Loveland Transit’s Title VI policy and complaint procedure, please submit a written request to the above address or visit [www.cityofloveland.org/COLT](http://www.cityofloveland.org/COLT).

## Section I

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**Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Phone numbers:**

Home \_\_\_\_\_

Work \_\_\_\_\_

E-mail \_\_\_\_\_

Accessible Format Requirements?

Large Print:  Audio tape:  TDD:

Other: \_\_\_\_\_

## Section II

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Are you filing this complaint on your own behalf? Yes  No

*[If you answered "yes" to this question, go to Section III.]*

If not, please supply the name and relationship of the person for whom you are complaining: \_\_\_\_\_

Please explain why you have filed for a third party. \_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes  No





### Section III

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I believe the discrimination I experienced was based on (check all that apply):

Race  Color  National Origin

Date of Alleged Discrimination (Month, Day, Year): \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

### Section IV

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Have you previously filed a Title VI complaint with this agency? Yes  No

### Section V

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Have you filed this complaint with any other Federal, State or local agency or with any Federal or State court? Yes  No

Federal Agency \_\_\_\_\_  State Agency \_\_\_\_\_  
 Federal Court \_\_\_\_\_  Local Agency \_\_\_\_\_  
 State Court \_\_\_\_\_

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

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Agency: \_\_\_\_\_  
Address: \_\_\_\_\_  
Phone: \_\_\_\_\_

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Signature \_\_\_\_\_ Date \_\_\_\_\_

*[Note - We cannot accept your complaint without a signature.]*

Please mail your completed form to:  
City of Loveland  
Attention: Title VI Coordinator  
500 East Third Street  
Loveland, CO 80537



## Active Lawsuits, Complaints or Inquiries Alleging Discrimination

The Title VI Coordinator maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming COLT that allege discrimination on the basis of race, color or national origin. This list includes the date that the transit-related Title VI investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by COLT in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there are no known complaints pending which allege discrimination on the grounds of race color or national origin.

## COLT'S PUBLIC PARTICIPATION PLAN

### Key Principles

COLT's Public Participation Plan has been prepared to ensure that no one is precluded from participating in COLT's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The concerns of all participants involved, including the public will be considered in COLT's decision-making process; and
- COLT will seek out and facilitate the involvement of those potentially affected.

Through an open public process, COLT has developed a public participation plan to encourage and guide public involvement efforts and enhance access to COLT's transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the key principles, overall goals and objectives, and outreach efforts that COLT uses to reach its riders.

### LIMITED ENGLISH PROFICIENT (LEP)

**LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.**

## Early, Continuous and Meaningful

The steps outlined in the public participation plan offer early (in the planning process), continuous and meaningful opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions at COLT. It is a guide for how COLT engages its diverse community. COLT may continue to improve its public participation methods over time based on feedback from all of its riders and community members including low-income, minority and LEP populations as well as customer and community-based organizations.

## Goals of the Public Participation Plan

The primary goals of COLT's public participation plan was reviewed and adopted during the Transportation Board Meeting on May 5th, 2014:

- Clarity in Potential for Influence - The process clearly identifies and communicates where and how participants can have an influence and direct impact on decision making.
- Consistent Communication - COLT communicates regularly, develops trust with riders and the community and builds community capacity to provide public input.
- Diversity - Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents with Limited English Proficiency
- Accessibility - Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- Relevance - Issues are framed in such a way that the significance and potential effect is understood by participants.
- Participant Satisfaction - People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- Partnerships - COLT develops and maintains partnerships with communities through the methods described in its public participation plan.
- Quality Input and Participation - That comments received by COLT are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

## Objectives of the Public Participation Plan

COLT's Public Participation Plan is based on the principles below set forth.

- Flexibility - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness - COLT will proactively reach out to and engage low income, minority and LEP populations from the COLT service area.
- Respect - All feedback will be given careful and respectful consideration.
- Proactive and Timeliness - Participation methods will allow for early involvement and be ongoing.

- Clear, Focused and Understandable - Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- Honest and Transparent - Information provided will be accurate, trustworthy and complete.
- Responsiveness – COLT will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income, limited English proficient and minority members of the public and in locations relevant to the topics being presented and discussed.

COLT will use its public participation plan when considering fare changes, modifications to routes and schedules and other transit planning projects when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours;
- Changing any given route or group of routes that affects more than 25% of the riders using the affected route(s); or
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.

For minor schedule and service changes not rising to the level of those above, COLT will post service change notices on appropriate buses and bus stops sixty days in advance of the change date.

## REGIONAL PARTNERSHIP/CAPITAL PROGRAMMING

**For its capital programming, including major facility and bus procurements, COLT uses the adopted public participation plan dated March 5, 2015. This plan clearly indicates that the Metropolitan Planning Organization's public participation process satisfies COLT's public participation requirements for its Program of Projects. The notices for the regional Transportation Improvement Program (TIP) also state that the notice of public involvement activities and time established for public review of and comments on the TIP will satisfy FTA's program of projects requirement.**

## COLT's Public Participation Process

### Outreach Efforts – Alerting Riders and Encouraging Engagement

COLT's public participation plans include many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. While COLT maintains these elements in its outreach program along with traditional seat-drop flyers, COLT has availed itself of the communication methods more widely used by members of our community and riders.

While there may be minor variation in the outreach process from time-to-time, the outline below provides the general steps for engaging riders in the decision making process using a fare or service change as an example.

1. A service/fare change proposal is developed internally or as a result of public comment;
2. Proposals are reviewed by the City of Loveland's Transportation Advisory Board (TAB);
3. A Title VI review of the proposal is conducted;
4. If required, authorization from the City Council is sought to proceed to a public comment period;
5. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the COLT service area;
6. Bilingual (English and Spanish) public outreach materials and a program are developed;
7. Outreach In advance of public information sessions is released (using tool-box of mediums listed below);
8. An Email is transmitted to COLT community partners;
9. The public comment period ends;
10. A City Council summary package is presented detailing the outcome of the public participation process along with staff recommendations;
11. The final service/fare change date is set;
12. Outreach is conducted in advance of any service or fare change;
13. The bilingual system timetable and the City's website are updated in advance of the proposed change.

## SELECTION OF MEETING LOCATIONS

**When determining locations and schedules for public meetings, COLT will:**

- **Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;**
- **Employ different meeting sizes and formats including town hall type meeting formats;**
- **Coordinate with community organizations, education institutions and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;**
- **Consider radio or newspaper ads that serve LEP populations; and**
- **Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments.**

## COLT Mediums (Bilingual)

- Print – Newspapers
- Outdoor – Advertising on board buses (interior) and on bus stops/shelters
- Social media – COLT uses Facebook (570 fans) and Twitter (292 followers)
- Radio – (if available and appropriate)
- Seat Drops, On-board Flyers –COLT uses seat drops and flyers to provide riders with details of service changes and schedules of public meetings and hearings.
- Public Information Meetings
- Legal Notices

### Facebook



## Twitter



## Addressing Comments

### The Incorporation of Public Comments into Decisions

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways riders or community members can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments are assembled into a single document for presentation to the City Council.

### Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefits of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, COLT has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of COLT's community stakeholders can be obtained by contacting COLT.

## STAKEHOLDER LIST

**Any community organization or person can be added to COLT's stakeholder list and receive regular communications regarding service changes by contacting the COLT administrative office at (970) 962-2700. Local organizations and businesses can also request that a speaker from COLT attend their regular meeting at the same number.**

## LANGUAGE ASSISTANCE PLAN

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### Improving Access for People with Limited English Proficiency

In order to ensure meaningful access to programs and activities, COLT uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps COLT to determine if it communicates effectively with LEP persons and informs language access planning.

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by COLT;
2. The frequency with which LEP persons come into contact with COLT services and programs;
3. The nature and importance of COLT's services and programs in people's lives; and
4. The resources available to COLT for LEP outreach, as well as the costs associated with that outreach.

#### Factor 1 - Number of LEP Persons in Service Area

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter COLT's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, COLT evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census Bureau American Community Survey 2016 for the City of Loveland. <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF> Data was reviewed as well for Larimer County in its entirety for comparison purposes only.

## City of Loveland Overview

COLT’s service system encompasses the 35.67 square mile area of the City of Loveland, Colorado. As table-1 shows, there is a relatively low number of persons in the City of Loveland’s permanent population who had difficulty speaking English, 1561 individuals, 2.9% of persons 5 years of age and older, in the year 2016. According to the Census, 85% of those were Spanish speakers.

<b>Table 1- individuals Speaking English "Not Well" or "Not at All"</b>		
<b>Data Category</b>	<b>City of Loveland</b>	
	<b>#</b>	<b>%</b>
Total Population (5 years old & older)	69241	100%
<i>Population Speaking English "Not Well " or Not at All"</i>		
<b>Spanish</b>	<b>3133</b>	<b>4.5%</b>
<i>Other Indo-European</i>	881	1.3%
Asian and Pacific Islander	272	0.4%
<i>Other</i>	114	0.2%
<b>Total</b>	<b>4400</b>	<b>6.4%</b>

Several conclusions can be drawn from this review:

- 6.4% of residents of the City report speaking English “less than well”;
- Of those reporting speaking English “less than well”, the largest population speaks Spanish at home;
- Beyond those reporting speaking Spanish at home and speaking English “less than very well,” there are no other LEP populations at this time which meet the “Safe Harbor” threshold for which COLT will translate vital documents.

Additionally:

- There is a need to translate documents and outreach materials into Spanish (COLT uses Telelanguage Inc., for its Spanish translations).

## Factor 2 - Frequency of LEP Use

There are a number of places where COLT riders and members of the LEP population can come into contact with COLT services including the use of fixed route and demand response buses, calls to customer service representatives, dispatch and COLTS’s outreach materials. An important part of the development of COLT’s Language Access Plan is the assessment of major points of contact, including:

- The use of the bus service (on-board signage);
- Communication with COLT’s customer service staff;
- Bus pass sales;
- Printed outreach materials;
- Web-based outreach materials;

- Public meetings;
- Local news media (print and radio);
- Service related posters at COLT’s bus stops/shelters.

To better understand the frequency with which LEP riders come into contact with COLT services, COLT conducted internal surveys of fixed route drivers. The survey tool was aimed at determining what language skills already exist among COLT employees and the number and nature of encounters with riders or other community members where language might be a barrier.

COLT distributed language surveys to its employees. The objective of the survey was to evaluate the needs of COLT customers who are not able to communicate in English. The first question asked employees was if they could communicate in a language other than English, and if so, what language or languages.

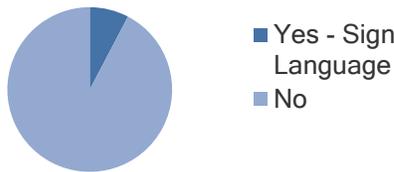
The surveys indicated, 1 of the 12 respondents could speak one or more languages other than English.

Next, the survey asked if in the previous year employees had encountered customers who were unable to communicate in English. A sample was taken in January 2016 with the following results:

ROUTE 100		ROUTE 200		ROUTE 300	
Spanish	Other	Spanish	Other	Spanish	Other
30	6	1	6	38	15

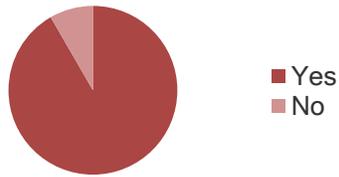
### Driver Survey Results:

Do you speak a Language other than English?



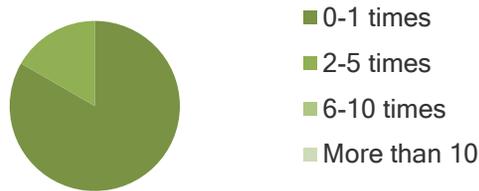
Answer Options	Response Percent	Response Count
Yes - Sign Language	8.3%	1
No	91.7%	11
		<i>answered question</i> 12

Have you encountered customers in the previous year who were unable to communicate in English?



Answer Options	Response Percent	Response Count
Yes	91.7%	11
No	8.3%	1
<i>answered question</i>		12

During a shift how often do you encounter LEP customers (Spanish speaking)?



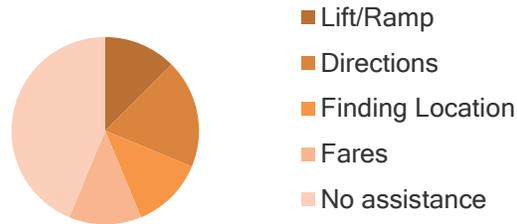
Answer Options	Response Percent	Response Count
0-1 times	83.3%	10
2-5 times	16.7%	2
6-10 times	0.0%	0
More than 10	0.0%	0
<i>answered question</i>		12

Have you encountered customers who speak languages other than Spanish/ English?



Answer Options	Response Percent	Response Count
Yes	75.0%	9
No	25.0%	3

What type of needs request for assistance have you received from LEP customers?



Answer Options	Response Percent	Response Count
Lift/Ramp	12.5%	2
Directions	18.8%	3
Finding Location	12.5%	2
Fares	12.5%	2
No assistance	43.8%	7

### Community Partners

As part of this assessment, COLT also canvassed five of its community partners to assess the extent to which they come into contact with LEP populations. (Note: Only two agencies responded.) COLT asked the partner agencies to estimate the percent of clients they interact with who would have limited English proficiency using the following questionnaire:

*Do you encounter non-English speaking/reading people who need your services?*

Yes, local agencies do encounter non-English speaking people.

*If so, what are the top three languages that you encounter?*

Spanish is the only other language encountered by the local agencies.

*How do you address language barriers?*

Local agencies use current staff or translation services.

*Do you find language to be a barrier in preventing you from providing service?*

No, the use of staff and translators have solved the issue.

## COMMUNITY PARTNERS

- **Thompson School District**
- **House of Neighborly Services**
- **United Way**
- **Department of Human Services**
  - **Larimer County Workforce**
  - **Larimer County Courts**

### Consulting Directly with the LEP Population

In addition to the census data, internal survey of employees and outreach to community partners, COLT offers on board surveys to its riders, to coincide with quarterly ridership surveys. This was established on May 5 2015, currently no rider surveys have been collected.

### Factor 3: The Importance of COLT Service to People’s Lives

Access to the services provided by COLT, both fixed route and demand response busses are critical to the lives of many in the community. Many depend on COLT’s fixed route services for access to jobs and for access to essential community services like schools, shopping and medical appointments. Riders eligible for demand response service under the American’s with Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these programs in the lives of many of the community residents, there is a need to ensure that language is not a barrier to access.

COLT staff conducts a quarterly survey of COLT riders, in addition to the LEP questions, staff will also ask how riders depend on the service for work related transportation.

If limited English is a barrier to using these services, individuals may not be able to obtain health care, education or employment. Critical information from COLT which could affect access by these individuals includes:

- Route and schedule information;
- Fare and payment information;
- Information regarding making the best use of the system (How To);
- Service announcements;
- Safety and security announcements;
- Complaint and comment forms;
- Outreach related to opportunity for public comments;
- Information about demand response services under the ADA and other special programs; and
- What to do in an emergency (where to look for service change announcements).

#### Example: COLT Interior Signage

##### **Do you need assistance?**

The City of Loveland Transit has language interpretation services available at their local office to assist you with any questions you might have about COLT. To utilize this service, please visit our office at 105 West 5<sup>th</sup> Street, Loveland any time during normal business hours Monday – Friday - 8:00 a.m. - 12:00 p.m. and 1:00 p.m. - 4:30 p.m. Thank you.

##### *Spanish version*

##### **¿Necesita ayuda?**

City of Loveland Transit tiene servicios de interpretación de idiomas disponibles en su oficina local para ayudarle con cualquier pregunta que usted pueda tener acerca de COLT. Para usar este servicio, por favor visite nuestra oficina en 105 West 5<sup>th</sup> Street, Loveland en cualquier momento durante horas de oficina de lunes a viernes - 8:00 a.m. a 12:00 p.m. y 1:00 p.m. a 4:30 p.m. Gracias.

## Factor 4 – Resources and Costs for LEP Outreach

COLT has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information (English/Spanish) is distributed in an extensive number of mediums including:

- A complete bilingual English/Spanish system timetable;
- A complete bilingual English/Spanish Rider’s Guide to demand response services (ADA paratransit);
- Bilingual English/Spanish outreach materials (seat drops and service change alerts);
- Bilingual English/Spanish representation at public meetings; and
- Bilingual English/Spanish on-board signage.

To date, the costs associated with these efforts have been absorbed within the COLT marketing and outreach budget. Costs are predominantly associated with translation services and material production.

## OUTCOMES

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### New tools and alerting riders of language assistance

Following the “Four Factor Analysis”, COLT concluded that, while there is currently extensive outreach and materials for the Spanish-speaking LEP population of the service area, additional services would assist other LEP populations regardless of the total population in the region. These include:

1. Maintaining Google Translate on COLT’s website; and
2. Adding translation services for telephone communications with customer service representatives.

The above items were launched, April 1, 2014.

### Oversight

#### Monitoring, Evaluating and Updating the Language Assistance Plan and Public Participation Process

In November 2013, The City of Loveland charged staff with improving community engagement. It is the responsibility of the Human Resources Department to ensure compliance with COLT’s Title VI Plan, Public Participation Program, Language Assistance Plan and other community outreach efforts. The monitoring of the Language Assistance Plan will include:

- Annual reviews of regional census data for changing patterns of LEP populations;
- Ongoing collaboration with regional partners;
- Ongoing review of Google Translate requests at COLT’s website; and

- Post Event Assessments (PEA).

### Post-Event Assessments

Following service changes, fare increases and planning projects, the City of Loveland's Human Resource Department assesses the effectiveness of public involvement against the goals established in this plan. This assessment will ask the questions below set forth:

1. Did the public know there was an opportunity to participate?
2. Was the purpose of the participation clearly articulated to the public?
3. Did the public have access to appropriate resources and information to allow for meaningful participation?
4. Did the decision making process allow for consideration and incorporation of public input?
5. Were there complaints about the public engagement process?
6. Were the public engagement efforts cost effective?
7. What additional methods could have been employed to improve the process?
8. Should the Public Participation Process or Language Assistance Plan be amended?

### Training Employees

The City of Loveland has hired a consultant to provide initial staff training and from there will acquire training materials, including videos, to train additional employees as needed or when hired.

### Translation of Vital Documents

COLT has translated its vital documents into Spanish. Vital documents are identified below.

- Civil Rights Complaint Form – Translated into Spanish in January 2014
- ADA Eligibility Applications – Translated in 2014
- ADA Service Overview Booklet – Translated into Spanish in 2014
- On-board notices – Translated into Spanish in 2014
- Notification of free language services – Translated into Spanish in 2014
- Service Complaint Process and Form – Translated into Spanish in 2014
- Next Stop Signage – Translated into Spanish 2014
- COLT Press Release Template – Translated into Spanish 2015

## DECISION MAKING BODIES

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### Non-Elected Committees and Councils

At COLT, decisions regarding policy, service changes, fares, capital programming and facility locations are reviewed by a municipally appointed Transportation Advisory Board (TAB). This board is composed of seven members of the local community. Meetings of the TAB are always open to the public.

*Transportation Advisory Board*

Body	Caucasian	Latino	African American	Asian American	Other
Population	84.1%	11.8%	0.4%	1.5%	2.2%
Citizen Advisory Board (TAB)	86%	14%	0%	0%	0%

## SERVICE STANDARDS and POLICIES

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### Vehicle Load

Vehicle Load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Vehicle Type	Seated Capacity	Standing Capacity	Total Capacity	Preferred	Average Load	Maximum Load
2004 Ford E450	20	0	20	NA	NA	20
2002 Ford CL100	17	0	17	NA	NA	17
2011 Ford E450	23	0	23	NA	NA	23
2011 Ford E450	23	0	23	NA	NA	23
2007 Ford E350	10	0	10	NA	NA	10
2007 Ford E350	10	0	10	NA	NA	10
2008 Chevy Van	3	0	3	NA	NA	3
2009 Gillig	32	52	84	NA	NA	84
2011 Gillig	32	52	84	1	1.6	84
2011 Gillig	32	52	84	1	1.6	84

## Vehicle Headway (Frequency)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. COLT buses are scheduled on fixed routes with 30 or 60 minute frequencies. COLT will consider more frequent service where funding levels permit and ridership levels warrant and less frequent service where demand dictates.

### *Policy Headways and Periods of Operation*

Service	Weekday Peak	Weekday Off Peak	Saturday	Saturday Off Peak
Fixed Routes 1 & 2	30	30	30	30
Fixed Routes 3, 4 & 5	60	60	60	60

## On-Time Performance

Among the most important service standard for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than 5 minutes late.
- COLT’s on-time performance objective is 90% or greater on fixed routes and 95% on para transit routes.

## Service Availability – Access to the Bus

COLT currently provides transit service so that approximately 85% of all residents of the City of Loveland are within a 1/2 mile walk of bus service. Consideration is given to new markets as demand warrants and as resources become available.

## Vehicle Assignment Policy

With several practical considerations, COLT assigns buses to service so that average age of the buses serving each route does not exceed the average age of the fleet. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.

## Transit Amenity Policy

COLT has 115 stops in the service area – many located and installed more than 15 years ago. Stops, shelters and benches are placed according to industry standards (TCRP Report 19) with consideration of permitting and for local and special needs.

The installation of new bus amenities can be requested by sending an email to COLT at [COLT@cityofloveland.org](mailto:COLT@cityofloveland.org) or calling (970) 962-2700.

When the annual cost of repairs to any amenity (beyond the cost of normal cleaning) is greater than the cost of the structure, COLT reserves the right to permanently remove the amenity.

## Monitoring Service Standards

For the on-going monitoring and measurement of service standards and policies, COLT uses the following schedule and methods

Service/Standard Policy	Sample Schedule	Methodology
Vehicle Load	All routes Quarterly	Surveys on all Fixed Route Buses
Vehicle Headways	Assessed Annually	Annual System Review
On-Time Performance	Assessed Monthly	Monthly System Review
Service Accessibility	Assessed Annually	Geographic Information System Review
Vehicle Assignment Policy	Assessed Quarterly	Quarterly System Review

## Summary of Changes

### Service Change Evaluations/Taking Action/Summary of Significant Service Changes

Since COLT's 2010 Title VI Plan Submission there have been no changes in COLT's fare structure. There has been one service change. This change, the associated outreach and Title VI determination are available by contacting the Transit Manager at (970) 962-2700 or send a written request to 105 W. 5<sup>th</sup> St., Loveland, CO 80537.



## Construction Equity Analysis

When COLT plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, transit hub or operation center, COLT will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility. The following principles will be applied in the analysis:

1. Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations; and
2. Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

COLT will follow federal guidance provided in FTA Circular 4702.1B (October 2012).

## PROGRAM SPECIFIC REQUIREMENTS

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### Title VI Monitoring (from 2018 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the COLT's 2018 program can be obtained by contacting COLT.

### Sub-recipient Compliance

During this report period, COLT did not engage with any sub-recipients.

In the event COLT engages one or more sub recipients it will must monitor each sub recipient for compliance with the Title VI requirements by undertaking the following activities:

1. Document a process for ensuring that all sub recipients are complying with the general reporting requirements of FTA Circular 4702.1B (October 2012), as well as other requirements that apply to the sub recipient based on the type of entity and the number of fixed route vehicles it operates in peak service if a transit provider;

2. Collect Title VI Programs from sub recipients and review programs for compliance. Collection and storage of sub recipient Title VI Programs may be electronic at the option of COLT; and
3. At the request of FTA, in response to a complaint of discrimination, or as otherwise deemed necessary by COLT, COLT will request that sub recipients who provide transportation services verify that their level and quality of service is provided on an equitable basis.

## Equity Analysis for Facility

During the past three years, COLT has not constructed a vehicle storage, operations center or maintenance facility.

## Demographic Service Profile

Because COLT operates 4 buses in peak service, a demographic service profile was not prepared for this plan update.

# CONTACT

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For additional information on the City of Loveland Transit's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Title VI Coordinator  
City of Loveland  
500 East 3<sup>rd</sup> Street  
Loveland, Colorado 80537  
Tel: (970) 962-2372  
E-mail: [TitleSix@cityofloveland.org](mailto:TitleSix@cityofloveland.org)