

# 2022 Title VI Program Update

Submitted in fulfillment of Title VI of the  
Civil Rights Act of 1964 and FTA Circular 4702.1B



**Dear Reader,**

Every three years TriMet is required to review and update our Title VI Program, however our commitment to and focus on civil rights, equity and social justice is an integral part of our daily operations. Fair treatment, equal access, and personal dignity drives our decision making and directs how TriMet provides transportation services to the citizens of the Metro Portland Area.

The historic Civil Rights Act of 1964 created a mandate that public accommodations and services, like public transit, be provided in a manner that does not discriminate against people based upon race, color, national origin, English proficiency, or economic status. TriMet eagerly fulfills the mandate of the Civil Rights Act by having robust compliance with Title VI of the Act and we engage in proactive measures that value equity in the services we provide.

Since being appointed TriMet General Manager in June 2021, I have continued our investments in civil rights by establishing a new Inclusion, Diversity, Equity and Accessibility Office, elevating the oversight and management of this work to an executive level position. This new office will deepen our commitment to the advancement of equity, and continuously monitor compliance with Title VI, moving our work forward with an equity and social justice lens.

During our review of our Title VI program, I thought of civil rights leader Julian Bond who said, “The humanity of all Americans is diminished when any group is denied rights granted to others.” We remain passionately committed to carrying this work forward, ensuring that everyone in our community can fairly access and utilize our transit system.

Sam Desue Jr.  
TriMet General Manager



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# Introduction

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## WHAT IS TITLE VI?

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities of any entity that receive federal assistance.

The **Civil Rights Act of 1964** is a landmark civil rights and labor law in the United States that outlaws discrimination based on race, color, religion, sex,<sup>[a]</sup> and national origin.<sup>[4]</sup> It prohibits unequal application of voter registration requirements, racial segregation in schools and public accommodations, and employment discrimination. The act stands as one of the most significant legislative achievements in American history. The Civil Rights Act of 1964, included eleven “Titles” outlawing several types of race-based discrimination. One of these “Titles” – Title VI – included the following provision:

The United States has a long history of unjust and unequal treatment towards people of color. Although we have come a long way over the past few centuries, we still see disparities throughout our society along the lines of race, ethnicity, and class– even in cases where decisions are made with the best of intentions.

The Civil Rights Movement of the mid-1950’s and 60’s brought the issues of segregation and racial injustice to the forefront of our national consciousness. The movement resulted in the historic passage of the Civil Rights Act of 1964, which included eleven “Titles” outlawing several types of race-based discrimination. One of these “Titles” – Title VI – included the following provision:

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*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.*

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**The intent of Title VI is to remove barriers** and conditions that prevent minority, low-income, and persons with limited English proficiency (LEP) from equal access to public goods and services. In effect, Title VI promotes fairness and equity in federally assisted programs and activities. Title VI is rooted in the Constitutional guarantee that all human beings are entitled to equal protection of the law, and specifically addresses involvement of impacted persons in the decision-making process.

**There are many forms of unlawful discrimination** based on race, color, or national origin that can limit the opportunity of underrepresented communities to gain equal access to services and programs. In

operating a federally assisted program<sup>1</sup>, a recipient cannot, on the basis of race, color, or national origin, either directly or through contractual means:

- Deny program services, aids, or benefits;
- Provide a different service, aid, or benefit, or provide them in a manner different than they are provided to others;
- Omit participation and access by limited English proficient persons; or
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid, or benefit.

## WHAT DOES THIS MEAN FOR TRIMET?

The policies, procedures, standards, practices, and analysis provided in this document illustrate how the Tri-County Metropolitan Transportation District of Oregon (TriMet) ensures compliance with Title VI. As a recipient of federal financial assistance through the Federal Transit Administration (FTA), TriMet is subject to the rules and regulations provided through FTA Circular 4702.1B “*Title VI Requirements and Guidelines for Federal Transit Administration Recipients*” effective October 1, 2012 (“Circular”). This report is provided as documentation of compliance with Title VI of the Civil Rights Act of 1964 in accordance with FTA grant recipient requirements.

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### **About TriMet**

*TriMet is a mass transit district created by the Oregon legislature pursuant to Oregon Revised Statutes (ORS) Chapter 267. TriMet is a local government as defined under Oregon law, providing bus, light rail, commuter rail, and LIFT paratransit public transportation service in the Portland metropolitan area, providing about 100 million rides each year. Guided by a Board of Directors representing seven sub-districts, the organization is directed by a General Manager appointed by the Board and employs about 3,000 union and non-union employees.*

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The General Manager has overall responsibility for carrying out the TriMet’s commitment to the Title VI program. TriMet’s Chief, Inclusion, Diversity, Equity and Accessibility Officer and the Civil Rights and Equity Programs Manager are primarily responsible for administering and monitoring Title VI requirements, but it is the duty of every employee, vendor and contractor of the agency to ensure compliance with nondiscrimination and to further civil rights protections. The TriMet Board of Directors must also approve the agency’s Title VI program prior to its submittal to FTA.

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<sup>1</sup> The Civil Rights Restoration Act of 1987 amended each of the affected statutes by adding a section defining the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance.

## TRIMET'S COMMITMENT TO EQUITY

TriMet's commitment to equity can be seen across our agency, the transportation system we manage, and the community we serve. Equity is integrated into the policies and practices we develop and implement. It is embedded in the investments we make and partnerships we build, our workforce, our approach to contracting and our ever growing connections to our community.

In partnership with our Transit Equity Advisory Committee (TEAC) and our Committee on Accessible Transportation (CAT) we continue to look for areas across the agency to improve our overall equity strategy. Continuing to invest in transit equitably and embracing an inclusive model where equity is a core business objective is critical to TriMet.

As we look to recover from the Global Pandemic and begin to increase our services over the years ahead we look forward to continuing to expand our commitment to equity and fairness within and across our system through the implementation of our Title VI program and beyond.

## DEFINITIONS

The following terms and definitions are from FTA Circular 4702.1B unless otherwise noted.

Direct Recipient – An entity that receives funding directly from FTA. For purposes of Title VI, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to subrecipients, whereas a primary recipient does.

Discrimination – Any action or inaction, whether intentional or unintentional, in any program or activity of a federal aid recipient, subrecipient, or contractor that results in disparate treatment, Disparate Impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate Impact – A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disparate Treatment – Actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e. less favorably) than others because of their race, color, or national origin.

Disproportionate Burden – A neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Environmental Justice – Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," was signed by President Clinton on February 11, 1994. Subsequent to issuance of the Executive Order, the U.S. Department of Transportation (DOT) issued a DOT Order for implementing the Executive Order on environmental justice (EJ). The DOT Order

(Order 5610.2(a), “Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” 77 FR 27534, May 10, 2012) describes the process the Department and its modal administrations (including FTA) will use to incorporate EJ principles into programs, policies, and activities.

Fixed Route – Public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Limited English Proficient (LEP) Persons – 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.

Low-Income Person – As defined by TriMet, for the purposes of Title VI low-income is defined as a person whose median household income is at or below 150 percent of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Low-Income Population – Any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Low-Income Transit Route – A route that has at least one half of its total revenue mileage in a Census block or block group with a percentage of low-income population that exceeds the percentage of low-income population in the transit service area as a whole.

Minority Persons – Include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority Population – Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed Department of Transportation (DOT) program, policy, or activity.



Minority Transit Route – As defined by TriMet and in conformance with FTA C4702.1B. A route that has at least one third of its total revenue mileage in a Census block or block group with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

National Origin – The particular nation in which a person was born, or where the person’s parents or ancestors were born.

New Transit Route - A proposed designation of a transit route not currently listed in the TriMet Code Chapter 22- Routes and Schedules; 22.05 Schedule Notices will be considered as a “New Transit Route” as referenced in Part II: Title VI Policies, Major Service Change Policy when such a route designation, if adopted, is to be included in the list of transit routes by subsequent amendment of the TriMet Code. The only such designation not considered as a “New Transit Route” is a change in route number and/or name only with no associated changes in routing, frequency, hours and days of service.

Non-minority persons – White (non-Hispanic)

Public Transportation – Regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low-income. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation can be either fixed route or demand response service.

Recipient – Any public or private entity that receives federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

Service Standard/Policy – An established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

Subrecipient – An entity that receives federal financial assistance from FTA through a primary recipient.

Title VI Program – A document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

Transit Equity – TriMet defines Transit Equity as:

- Policies that promote the equitable distribution of burdens and benefits
- Promoting equal access to resources and services
- Engaging transit-dependent riders in meaningful planning and decision-making processes

Transit Provider – Any entity that operates public transportation service, and includes states, local and regional entities, and public and private entities. This term is inclusive of direct recipients, primary recipients, designated recipients, and subrecipients that provide fixed route public transportation service.



# Part I: General Requirements

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FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years. For all recipients, the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Attachment A includes a copy of the TriMet Board of Director's (Board) resolution evidencing approval of TriMet's Title VI Program.

The General Requirements section of this report contains Title VI Program components required in Chapter III of FTA Circular 4702.1B. This section includes the following information:

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. List of Title VI Investigations, Complaints, and Lawsuits
4. Public Participation Plan
5. Language Access Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Equity Analysis for Facilities Siting and Construction
9. Equity Analyses of major service and fare changes completed since the 2016 submission

## TITLE VI NOTICE AND COMPLAINT PROCEDURES

TriMet posts the Title VI public notice on the agency website<sup>2</sup>, in all vehicles (bus and rail), and in the administrative offices. TriMet's Title VI complaint form<sup>3</sup> and procedures<sup>4</sup> are also available on the agency website. The complaint form is located in Attachment B, Attachment C shows the vehicle notice, and Attachment D shows the administrative office notice.

TriMet's Title VI website notice is stated below:

### **TriMet Respects Civil Rights**

TriMet operates its programs without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable law.

### **TriMet Title VI Policy Statement**

Title VI of the Civil Rights Act of 1964 states:

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

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<sup>2</sup> <http://www.trimet.org/about/titlevi.htm>

<sup>3</sup> <http://www.trimet.org/pdfs/about/titlevi-complaint.pdf>

<sup>4</sup> <http://www.trimet.org/about/titlevi-procedure.htm>

TriMet is committed to complying with the requirements of Title VI in all of its federally funded programs and activities. To request additional information on TriMet's Title VI nondiscrimination requirements, call us at 503-238-7433 (TTY 7-1-1) or send us an email at [hello@trimet.org](mailto:hello@trimet.org).

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### ***From the Title VI Circular***

*“[Recipients are required] to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency’s website and in public areas of the agency’s office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles.”*

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### **Making a Title VI Complaint**

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with TriMet. Any such complaint must be in writing or submitted via online fillable form and filed with TriMet within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact TriMet by any of the methods below.

#### **Mail**

Civil Rights Title VI Investigator  
1800 SW 1st Avenue, Suite 300  
Portland, OR 97201

**Direct Complaint Phone:** 503-962-3453 (FILE)

**Customer Service Phone:** 503-238-7433

**Fax:** 503-962-2283

**Email:** [hello@trimet.org](mailto:hello@trimet.org)

#### **Web Based Complaint**

Title VI Complaints can also be filed online by visiting the link to the web page below:

<https://trimet.org/about/titlevi-complaint.htm>

You may also file a complaint directly with the Federal Transit Administration:

Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE  
Washington, D.C. 20590

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*From the Title VI Circular*

*“[R]ecipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient’s website. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT’s Title VI regulations.”*

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TriMet’s Civil Rights complaint procedures are as follows:

**Civil Rights Complaint Procedure**

Under Title VI, any person who believes they have been aggrieved by an unlawful discriminatory practice on the basis of race, color or national origin by TriMet may file a complaint by completing and submitting TriMet’s Civil Rights Complaint Form. In addition to Title VI protected categories, TriMet accepts allegations of discrimination complaints based on sex, gender identity, sexual orientation, age, religion, marital status, disability in accordance with Oregon Revised Statute 659A.403.

TriMet investigates complaints received no more than 180 days after the alleged incident. TriMet will process complaints that are complete. Once a completed Complaint Form is received, TriMet will review it to determine if TriMet has jurisdiction. The complainant will receive an acknowledgement letter informing the complainant whether the complaint will be investigated by TriMet.

TriMet will generally complete an investigation within 90 days from receipt of a completed Complaint Form. If more information is needed to resolve the case, TriMet may contact the complainant. Unless a longer period is specified by TriMet, the complainant will have ten (10) days from the date of the letter to send requested information to the TriMet investigator assigned to the case.

If TriMet’s investigator is not contacted by the complainant or does not receive the additional information within the required timeline, TriMet may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue their case.

After an investigation is complete, TriMet will issue a letter to the complainant summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with TriMet’s determination, he/she may request reconsideration by submitting a request in writing to TriMet’s General Manager within seven (7) days after the date of TriMet’s letter, stating with specificity the basis for the reconsideration. The General Manager will notify the complainant of his decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the General Manager will issue a determination letter to the complainant upon completion of the review.

## TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

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### *From the Title VI Circular*

*“FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.”*

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Information regarding investigations, complaints and lawsuits for the reporting period is provided below.

### **Investigations**

There was one State of Oregon Bureau of Labor and Industries (BOLI) public accommodations investigation during the reporting period alleging disability discrimination. It was investigated by BOLI and was dismissed for lack of sufficient evidence to continue investigation on May 19, 2022.

### **Lawsuits**

A complaint was filed in State Court on September 30, 2019, alleging that a bus operator did not allow complainant to bring his bag of cans onto the bus due to racial animus. TriMet settled the claim via \$100 loaded onto a HOP Fastpass fare card.

A pro se complaint was filed in state court on February 13, 2020, that alleged discrimination and a violation of his state constitutional rights based on TriMet’s fare inspection procedures and practices. TriMet moved to dismiss, which the Court granted on April 13, 2021 and a judgment was entered on June 9, 2021.

Pro se plaintiff alleged discrimination on the basis of disability and religion related to TriMet’s mask requirements. He filed the complaint on or about April 30, 2021, in Multnomah County Circuit Court. He also filed a complaint with BOLI about the same set of facts, which was dismissed due to the pending lawsuit. Plaintiff voluntarily dismissed his complaint on or about March 15, 2022, and a general judgment was entered on June 24, 2022.

On or about January 28, 2021, Complainant filed a complaint pro se against TriMet and 43 others alleging civil rights violations and disability discrimination involving various encounters with TriMet

employees and passengers between 2015 and 2018 (as well as other allegations involving law enforcement). TriMet moved to dismiss and, after plaintiff did not file amended claims at the Court's request, the Court dismissed the case. A judgment of dismissal was entered on March 3, 2022.

On March 15, 2021, plaintiff pro se filed a complaint in federal court alleging that his rights were violated when the bus operator did not stop for him. Though not totally clear, the complaint suggests that the failure to stop for him was based on the plaintiff's race. TriMet moved to dismiss, and the motion was granted. The Court entered a judgment of dismissal on November 17, 2021.

## Formal Complaints

Formal complaints submitted to TriMet were received, investigated and resolved by TriMet staff. Table I-1 lists formal complaints received during the reporting period.

The Action Taken/Findings category is designated in accordance with the following:

**Cleared:** The investigation concludes there was no violating conduct by the employee

**Confirmed:** Sufficient information has been obtained to determine the complaint as valid

**Incomplete:** There is insufficient information to make a finding of "Cleared" or "Confirmed"

**Inconclusive:** An irresolvable discrepancy exists between the employee's and the customer's account and no witness or evidence is available to corroborate either account

**TABLE I-1: TITLE VI COMPLAINTS RECEIVED BY TRIMET SINCE LAST PROGRAM SUBMITTAL**

Date Filed	Summary	Status	Actions Taken /Findings
11/9/2019	Complaint filed with TriMet related to asking Customer to remove modesty mask	Closed	Inconclusive
5/8/2020	Complaint filed with TriMet related to Bus leaving stop and opening doors for passenger	Closed	Inconclusive
12/17/2020	Complaint filed with TriMet alleging improper customer service by operator	Closed	Inconclusive
3/3/2021	Complaint filed with TriMet because the 79 bus does not adhere to schedule causing rider to have to use alternative transportation means	Closed	Cleared
3/12/2021	Complaint alleging a title VI violation related to an ongoing issue with an operator related to an event that occurred in November of 2020	Closed	Inconclusive
4/14/2021	Complaint filed with TriMet related to Fare Inspection on Max	Closed	Inconclusive

Date Filed	Summary	Status	Actions Taken /Findings
12/7/2021	Complaint filed with TriMet related to an allegation that a driver did not print out a partial ticket/transfer due to the rider's race.	Closed	Inconclusive
7/22/2021	Complaint filed with TriMet related to Fare Dispute, rider using ineligible Fare	Closed	Cleared
1/5/2022	Complaint filed with TriMet alleging Operator intentionally passed Stop and did not let rider de-board at requested location	Closed	Cleared
2/21/2022	Complaint filed with TriMet related to Rider being asked to de-board near rear bus exit	Closed	Cleared
2/27/2022	Complaint filed with TriMet related to rider argument with operator on customer service	Closed	Inconclusive
5/18/2022	Complaint filed with TriMet related to customer service issue for information regarding Max Train stoppage and explanation from Max Operator	Closed	Cleared
5/29/2022	Complaint filed with TriMet related to a rider appearing to be experiencing a behavioral health issue and arguing with Bus operator	Closed	Incomplete
5/29/2022	Customer service issue related to Bus stopping short of Bus Stop in order to avoid construction.	Closed	Inconclusive
6/1/2022	Customer Service Complaint alleging inconsistent treatment of riders	Closed	Incomplete
6/30/2022	Customer Service Complaint related to rider crossing yellow line near front entrance of bus before doors opened and Bus Stopped	Closed	Cleared
8/8/2022	Complaint filed with TriMet related to Operator leaving the stop before passenger could find their seats	Closed	Inconclusive

## PUBLIC PARTICIPATION PLAN

TriMet has an established comprehensive public involvement process to ensure minority, low-income and LEP populations are engaged through public outreach and involvement activities. TriMet's Public Engagement Framework (Attachment E) was originally submitted to the FTA on January 2013 as part of the response to the FTA's Title VI Program Review, and has been updated as part of this submittal. TriMet's Public Affairs Division and Office of Inclusion, Diversity, Equity and Accessibility serve as resources as a resource to other TriMet divisions to integrate these populations into TriMet's public involvement activities.



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### *From the Title VI Circular*

*“The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient’s established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient’s public participation activities)... Recipients should make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available.”*

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In proposing service or fare changes TriMet uses a variety of methods to communicate and solicit feedback from the community and targeted populations. TriMet also engages in extensive community outreach in conjunction with large-scale projects to ensure that affected residences and businesses are informed about the impacts and benefits of the project and are provided an opportunity for input in planning and implementation. On routes where there are a significant number of limited English proficient riders or households, TriMet staff translates materials to ensure those community members can participate. Special attention is paid to the identification of any transit-dependent persons potentially affected by a route or service change.

Consistent with the requirements of Title VI, TriMet staff use geographic information systems (GIS) mapping software to create maps that identify affected low-income, minority, and limited English proficient communities. The analysis is shared with TriMet staff working with affected communities to identify strategies to engage minority, low-income and LEP populations.

## **Public Participation Highlights**

The following is a summary of TriMet’s inclusive public participation since its 2016 Title VI Program submission. The summary spans from September 2019 to June 2022. During this period, TriMet conducted outreach for:

- Service Enhancement Plans/Forward Together
- Public Transportation Improvement Plan (i.e., TriMet’s STIF Plan)
- Bus service expansion
- Construction Projects
- Southwest Corridor Light Rail Project
- Redistricting Board Districts
- General Manager hiring
- Reimagining Public Safety
- 2022 Community Survey

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### TriMet's Transit Equity Advisory Committee (TEAC)

The Transit Equity Advisory Committee helps to extend the agency's outreach and involvement to transit dependent riders, as well as serve as a link to community organizations. The panel also provides direction on the agency's transit equity strategy, giving input and guidance on:

- Title VI and Environmental Justice analysis;
  - Service Planning, operational and capital investments;
  - Improving service to transit dependent riders; and
  - Disseminating information about transportation services to community-based organizations, social service agencies and the community at large.
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### TEAC & Reimagine Public Safety - Participating Organizations



## Public Participation Continued: Forward Together

Changes to the transit market resulting from the COVID-19 pandemic, such as greater work from home rates, lower peak commuter ridership, and increased demand to areas with essential workers are likely to remain to some degree. Consequently, TriMet is conducting a comprehensive service analysis called Forward Together, which will assess how the market for transit service has changed and reallocate service to new and growing ridership opportunities. The plan, which will supersede the Service Enhancement Plans, also make recommendation for where to direct future service expansions. Specifically, we're exploring:

- where buses serve now and where they should serve in the post-pandemic future,
- whether riders traveling more between suburbs rather than in and out of Downtown Portland, and
- if more buses should operate where people ride the most or spread across the region to serve more neighborhoods, regardless of ridership potential.

TriMet will complete Forward Together-Phase I in fall of 2022. Phase I will provide recommendations of where to reallocate existing transit service and where to direct future service expansions with projected STIF funding over the next several years. Forward Together-Phase II will make recommendations for important service expansions and improvements should new funding be identified.

TriMet staff will conduct outreach to Title VI and LEP communities via email, social media, open and meetings in partnership with community based organizations.

## Public Transportation Improvement Plan

In 2017, the Oregon Legislature passed HB 2017, The Keep Oregon Moving Act. The legislation included a 1/10<sup>th</sup> of 1 percent statewide payroll tax on employees for transit. This tax pays for the Statewide Transportation Improvement Fund, which is dedicated to funding various transit programs. Programs include fare mitigation, transit service expansion to low-income communities, expansion of electric buses, reduction of the fragmentation of services, transit programs for students in grades 9-12, and transit programs for seniors and people with disabilities. The legislation requires the recipient of the funds to work with an advisory committee to submit a plan for how the funds will be spent every two-years. Among the members of the HB 2017 Transit Advisory Committee, 57% identify as female, 43% identify as people of color, and one person identifies as a person with a disability. Many committee members represent people who earn low-incomes.

While the legislation also requires many of the programs to be directed towards low-income communities, it leaves it up to each advisory committee to determine what is low-income. The HB 2017 Transit Advisory Committee chose to rely on TriMet's Equity Index which considers 10 factors including income (200% of poverty), people of color, age – both seniors and youth separately, people with disabilities, limited English proficiency, limited vehicle access, low and medium wage jobs, affordable housing units, and key retail/human/social services. The top quartile of census block groups with the highest index scores are where many of the STIF programs are focused.

While developing the STIF Plan, TriMet staff worked with community based organizations to hold a series of workshops to determine the community's priorities for how to spend the funds. Among the programs, the community prioritized increasing transit service (e.g., new routes, increased frequency, and earlier/later service), a low-income fare program, and a transition to electric buses. As a result, much of the STIF funding that TriMet receives is directed to these programs. Other funds go to a high school pass program, transit programs for seniors and people with disabilities, a high school pass program, and capital projects.

## Bus Service Expansion

HB2017 provided a new statewide transportation funding package allowing for continued expansion of transit service and amenities. During the outreach process, TriMet utilized its multicultural contract with community organizations to reach out to Limited English Proficiency communities. Public outreach was conducted during our Annual Service Change process that includes multiple public meetings in multiple languages. The service expansion included:

New/extended routes or other route changes

- New Line 31-Webster Rd. in Clackamas County
- Streamlined Line 79-Clackamas/Oregon City on 82<sup>nd</sup> Dr. in Clackamas County
- Extension of Line 32-Oatfield to Oregon City High School
- Break Line 4-Fessenden/Division line into two lines to improve on-time performance
- Extend 24-Fremont across the Fremont Bridge to NW 18<sup>th</sup>/19<sup>th</sup> to Goose Hollow

More buses at more times

- 16-Front Ave: additional frequency during weekday peak travel and adding Sunday service
- 20-Burnside/Stark: upgrade to Frequent Service
- 30-Estacada: add Sunday service
- 32-Oatfield Rd.: add Sunday service
- 61-Marquam Hill/Beaverton: earlier/later service
- 64-Marquam Hill/Tigard: earlier/later service
- 66-Marquam Hill/Hollywood TC: earlier/later service
- 68-Marquam Hill/Collins Cir.: earlier/later service
- 73-122<sup>nd</sup> Ave: upgrade to Frequent Service
- 74-162<sup>nd</sup> Ave: increase frequency
- 76-Hall/Greenburg: upgrade to Frequent Service
- 78-Denney/Kerr Pkwy.: earlier/later/weekend service
- 81-Kane/257<sup>th</sup>: increase frequency and operate later/earlier trips
- 87-Airport Way/181<sup>ST</sup>: increased weekday span of hours to later in the evening
- 96-Tualatin/I-5: add midday service
- 155-Sunnyside: increased weekday peak frequency

Speeding up trips

- PBOT Rose Lane project partnership helped improve bus efficiency
- 15-Belmont/NW 23rd eastbound leg in downtown Portland moved to SW Alder to take advantage of the new Rose Lane leading to Morrison Bridge
- 2-Division and 10-Harold St route changes allow for launch of FX high capacity transit with 12 minute frequency

### Construction Projects

In 2015, TriMet began a rail repair and expansion process that addresses FTA required replacement of major sections and operating systems on MAX light rail. The Bus & Rail Reliability Strategic Team (BRRST) was created to plan for service disruptions and rail repair with a 6 to 9 month planning window prior to service disruptions.

Extensive outreach is required to prepare riders, neighbors and businesses for service disruptions, noise, and traffic control. Here are the projects completed from July 2019 through June 2022. TriMet uses a language plan to determine the top languages spoken around each construction area and around the shuttle bus detour area and mailers are sent in those languages explain the project. The most common languages used in mailers for these projects were English, Spanish, Vietnamese, Chinese, Russian, and Ukrainian, Additional mailing are sent if a noise variance or traffic control will impact neighbors.

**TABLE I-3: BRRST CONSTRUCTION PROJECTS**

DATE	LOCATION	
<b>Aug 4-19, 2019</b>	Lloyd District	Rail repair and switch replacement
<b>Sept 22 – Oct 5, 2019</b>	Gresham	Rail repair and operator break room construction
<b>Aug 2-29, 2020</b>	Downtown Portland	Steel Bridge rail and structure repair
<b>Oct 11-17, 2020</b>	Gresham	Rail repair and operator break room construction
<b>April 17-18, 2021</b>	Gateway MAX Improvements	Rail repair
<b>May 15-23, 2021</b>	Gateway/NE 33rd	Rail repair
<b>Oct 10-23, 2021</b>	Lloyd District	Rail repair and switch replacement
<b>Apr 2-9, 2022</b>	Gateway to PDX	MAX Red Line improvement project (Better Red)

## Construction Projects continued...

### Division Transit Project

Civil construction on the Division Transit Project, TriMet's first BRT line, took place from early 2020 through summer 2022. The 15-mile route serves some of the most diverse communities in TriMet's system. Based on demographic analysis, general project information was provided online and at community events in English, Spanish, Vietnamese, Russian and Chinese.

Three staff members – two bilingual English/Spanish – served as a central point of contact for neighbors, businesses and property owners, keeping them informed about construction activities and problem-solving concerns as they arose. TriMet also partnered with three community-based organizations to expand construction communications to LEP populations, including speakers of Chinese, Russian and Vietnamese.

As TriMet prepares to open the new line, FX2-Division, partnerships have expanded to share multilingual information about how to ride the new service.

**EL NUEVO SERVICIO EXPRESS FRECUENTE**  
RÁPIDO • FÁCIL • CONFIABLE

- Los autobuses pasan cada 12 minutos o menos durante las horas pico de viaje
- Autobuses más grandes con espacio para 50% más personas
- Señales de prioridad para el transporte público que prioriza a los autobuses para trayectos más rápidos
- Abordaje en todas las puertas para paradas más rápidas
- Carriles de autobuses en lugares claves para mantener a los autobuses fuera de la congestión
- Las paradas de autobús incluirán servicios como TransiTracker, iluminación y protección en contra del clima

El servicio de FX2-División entre Gresham y el Centro de Portland empieza el 18 de septiembre de 2022, pero espere ver a los nuevos autobuses a lo largo de la ruta durante el entrenamiento de los operadores de autobuses.

**Nuevos servicios de los autobuses y estaciones FX**

- 1 Puerta delantera**  
Tarjeta para el pago de boletos en efectivo y lector de Hop;  
Aborde y baje con dispositivos para movilidad;  
Rampa para dispositivos de movilidad
- 2 Puerta en el medio**  
Pague con Hop
- 3 Puerta trasera**  
Pague con Hop;  
Aborde y baje con una bicicleta
- 4 Asientos de prioridad**  
Para adultos mayores y personas con discapacidades
- 5 Bajar del autobús**  
Banda táctil/Cordón para tirar, para pedir al operador que pare en la siguiente estación;  
Letrero en la parte superior y altavoz para anunciar la siguiente estación
- 6 Rejillas para bicicletas**  
Aborde por la puerta trasera para usar cualquiera de las dos rejillas para bicicletas
- 7 Refugio**  
Cuentan con protección en contra del clima, una banca e iluminación para la noche (en la mayoría de las estaciones)
- 8 Carril para bicicletas**  
Los ciclistas deben dar el paso a los peatones
- 9 Letrero de TransiTracker**  
Muestra la llegada del siguiente autobús en tiempo real

Para obtener más información, llame a TriMet Community Affairs al 503-962-2150

220170-7/22-000

### MAX Red Line Extension and Reliability Improvements (“A Better Red”) Project

Civil construction on the MAX Red Line Extension and Reliability Improvements (“A Better Red”) Project began in Fall 2021. Construction activities are taking place in Hillsboro, a city with a significant Latino population, in the Gateway area of northeast Portland, and at Portland International Airport. Based on demographic analysis, general project information was provided online and at community events in English, Spanish and Vietnamese. Periodic mailings about construction impacts such as nighttime noise or traffic detours are provided in English and Spanish.

Three staff members serve as a central point of contact for neighbors, businesses and property owners, keeping them informed about construction activities and problem-solving concerns as they arise. TriMet is also partnering with a community-based organization to expand construction communications to Spanish- and Vietnamese-speaking populations.

## Rail crossing safety improvements

TriMet has constructed a number of safety improvements at rail crossings in the reporting period. Based on demographic analysis, general project information was mailed to neighbors in English and Spanish. One staff member served as a central point of contact for neighbors, businesses and property owners, keeping them informed about construction activities and problem-solving concerns as they arose.

## Board Redistricting

TriMet conducted public outreach from February to April of 2022 to comply with the Oregon Secretary of State's directive to reassess the boundaries of the seven board districts that make up the TriMet Service area. This is to make sure the districts are balanced when it comes to population after each census. New data from the 2020 census showed an increase of over 182,000 from the previous census. TriMet staff created three scenarios that redraw the district map to roughly balance the populations in each district.

In this effort TriMet presented the scenarios to the TriMet Board of Directors on February 23, 2022 and explained the redistricting process. A redistricting webpage with a language translation tool was created for the public explaining the scenarios and asked for written comment and offered two virtual public meetings on April 5 in Spanish and April 6 in English. An additional opportunity to comment came at the April 27 Board meeting. The public meetings were promoted via news releases, *TriMet On The Move* newsletter, stories in local newspapers and social media. Ten written comments and phone calls were received.

## General Manager Hiring

In February 2021, TriMet began an international search for a new general manager and initiated an outreach process to take the pulse of the community and gather feedback on the qualities and priorities for the person who will set and lead the strategic direction of TriMet.

Community feedback also provided the tools to update the job description, inform the interview questions and the TriMet Board's overall evaluation and decision. A webpage with translation tool was launched February 15 the background on the search process, job description, virtual public meeting information, Board meeting information, and the search timeline. Promotion was done by media releases, newsletters, a story in the Portland Tribune, social media ads, email blasts to over 10,000 people and an online survey in multiple languages.

Virtual public meetings were held on March 8, 9, 11 and 12. Three in English and one in Spanish. We received 3,428 responses to the survey, 191 virtual meeting attendees that garnered 83 comments.

## Reimagining Public Safety

With the support of a third-party analysis of the security challenges facing the region and the feedback from riders and employees, we convened a Transit Public Safety Advisory Committee of regional thought leaders, community representatives and national transit experts. The committee used the feedback gathered through the surveys and the listening sessions, the research results, and the local transit system analysis, to develop recommendations for TriMet's leadership to consider in moving the system forward with community informed strategies.

Between July and November 2020 we received over 13,000 survey responses, supported 300

one-on-one interviews and engaged 271 people in 31 focus groups. We received feedback in English, Arabic, French, Khmer, Lao, Russian, Spanish, Swahili, Ukrainian, Japanese, Korean, Chinese, Rohingya, and Vietnamese.

## 2022 Community Survey

In 2022, TriMet embarked on a comprehensive service analysis called Forward Together. The goal of the analysis is to determine how commutes, work locations, and transit use have evolved since remote working and a surge in job changes have altered how transit is used. The process is scheduled to be completed in April of 2023 when the TriMet will be presented with various transit changes that have been reviewed and commented on by the general public.

We began the process with a Future Transit Survey in multiple languages sent to various community organizations asking for feedback on the kind of service needed today, what priorities should be considered. The survey was distributed through email blasts and social media ads in multiple languages and included a prize drawing for those over 18. The survey garnered 5,214 responses that will inform the next phase of outreach starting in September 2022.

## LANGUAGE ACCESS PLAN

TriMet is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with limited English proficiency, or LEP. In 2019, TriMet updated its **Language Access Plan** and Implementation Schedule after an extensive review of the LEP populations in the TriMet service district and their needs. Staff continue to use the recommended two-tiered approach to meet the needs of LEP populations: Tier One retains successful programs and activities designed to meet the language needs of LEP populations; Tier Two identifies new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services. This plan continues to guide TriMet as to how to best serve LEP populations and is provided as Attachment F.

---

### *From the Title VI Circular*

*Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).*

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## Updated Four Factor Analysis

In accordance with FTA’s policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. TriMet updated its Four Factor Analysis in the spring of 2019. It relied on the most recent data available, including:

- US Census Bureau, 2016-2020 5-year sample, American Community Service data
- Oregon Metro Regional Land Information System (RLIS)
- Oregon Department of Education Student Language of Origin data , 2017-2018
- Oregon Health Authority Public Health Women-Infant-Children program data, 2016-2018
- Oregon Judicial Department court language service request data, 2016-2019
- TriMet Geographic Information System
- Spring 2018 on-board rider survey
- Fall 2018 fare survey
- Summer 2018 operator survey regarding contact with LEP persons
- Fall 2018 road and rail supervisors survey regarding contact with LEP persons
- Call center language interpretation requests and views of translated webpage [www.trimet.org](http://www.trimet.org)
- 2019 TriMet language services survey

This updated analysis will guide TriMet efforts to retain successful programs and activities designed to meet the language needs of LEP populations, and identify new areas of focus to further the agency’s goal of providing LEP customers with meaningful access to TriMet programs and services.

---

### *What is analyzed in a Four Factor Analysis?*

- 1. The **number or proportion** of LEP persons eligible to be served or likely to be encountered by the program or recipient.*
  - 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 to people’s lives.*
  - 4. The **resources** available to the recipient for LEP outreach, as well as the costs associated with that outreach.*
- 

Census data is shown in Table I-4. This data shows that of the estimated total population aged five years and older within Clackamas, Multnomah and Washington counties LEP populations represent 7.6 percent with the largest proportion consisting of Spanish speaking LEP individuals (3.3 percent).

The top five languages (Spanish, Vietnamese, Chinese, Russian and Korean) identified using US Census American Community Survey Tables: 2016 - 2020 (5-Year Estimates) mirror the top five

languages identified in the 2019 Four Factor Analysis performed by TriMet using the ACS 20122016 five-year sample data. These top five languages comprise 76.1 percent of the total LEP population as shown in Table I-4.

Additionally, using Oregon Department of Education data, Somali was identified in 2018 as meeting ODT’s “safe harbor” threshold of 1,000 or five percent of the population. Specifically, the data indicated that Somali is the sixth most common language spoken by students in the ESL Program (see Attachment F – 2019 Language Access Plan and 2019 Four Factor Analysis Update).

The map on page 24 (

Figure I-2: LEP population and TriMet district) depicts where these LEP populations are concentrated in relation to the TriMet service district. Areas are shaded corresponding to census tracts which had a LEP population greater than or equal to the average for the TriMet District (8.3 percent). Most LEP census tracts are located in the western, eastern, and northern parts of the service area.

**TABLE I-4: ACS LANGUAGES SPOKEN BY LEP PERSONS AGE 5 AND OLDER IN TRIMET DISTRICT**

Languages Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	51,133	3.3%	<b>43.1%</b>
Vietnamese	14,807	1.0%	<b>12.5%</b>
Chinese (Cantonese, Mandarin)	10,611	0.7%	<b>8.9%</b>
Russian	9,989	0.6%	<b>8.4%</b>
Korean	3,824	0.2%	<b>3.2%</b>
Arabic	2,748	0.2%	<b>2.3%</b>
Ukrainian	2,713	0.2%	<b>2.3%</b>
Tagalog	2,042	0.1%	<b>1.7%</b>
Japanese	1,858	0.1%	<b>1.6%</b>
Khmer	1,486	0.1%	<b>1.3%</b>

Persian/Farsi	1,118	0.1%	<b>1.0%</b>
Other (e.g., Somali and Thai)	22,171	1.4%	<b>18.9%</b>
<b>Total</b>	<b>118,646</b>	<b>7.6%</b>	

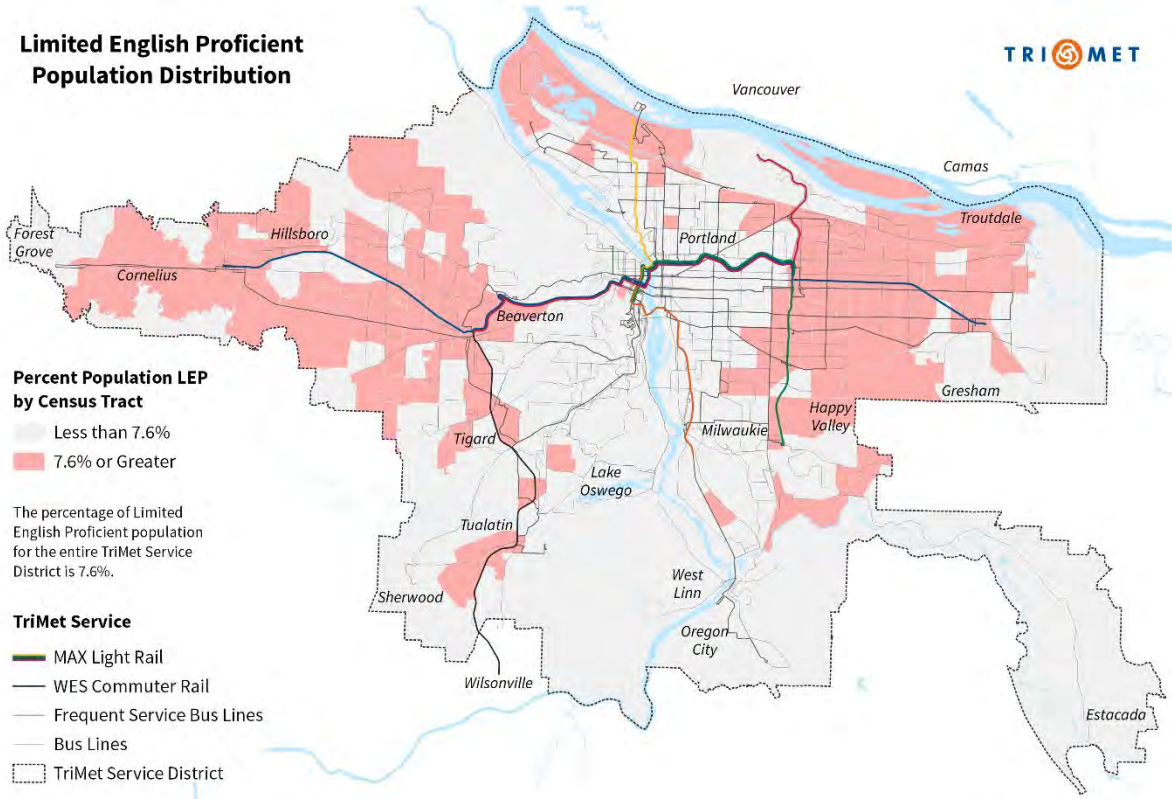
*Sources: TriMet GIS, Metro Regional Land Information System, and US Census ACS Tables: –2016-2020 (5-Year Estimates).*

### CONTINUED LANGUAGE SERVICES

TriMet’s web page contains links to information in Spanish, Vietnamese, Russian, Chinese, and Korean. In addition, the landing page for Spanish contains a Trip Planner en español. Spanish speakers can also access TransitTracker™ (real-time arrival information) en español by calling 503-238-7433 thereby accessing real time information on the next train or bus arrival. All LEP customers can access language assistance by calling 503-238-7433. In the past three years, language assistance has been provided to customers comprising over 50 languages. Seventy percent of all the calls requesting language assistance are from Spanish Speaking customers. TriMet’s multilingual web pages were also updated to include Title VI Civil Rights notification and complaint procedures as approved by the FTA.

The LEP program continues to coordinate with the agency’s outreach efforts regarding budget, service and fare changes, and construction projects to carry out targeted outreach to LEP communities that would be affected by proposed changes. The program continues to use bus bench ads in Spanish to promote the use of public transportation. TriMet also developed bilingual channel cards in English/Spanish for placement on all TriMet vehicles that communicate vital customer information for the following: Fare requirements, availability of TriMet customer assistance, safety and the rules for riding. A concept of a Language Assistance channel card is shown in Figure I-3. Placement on fixed-route, paratransit, and light rail vehicles took place in fiscal year 2020. Existing channel cards shown in Figures I-4 through I-6 have been placed in all vehicles. TriMet continuously modifies and updates this material as illustrated by the current and prior Rules For Riding cards in figure I-6 . TriMet also expanded the number of languages included in its “How to Ride brochure”. Figure I-7 shows the updated brochure cover.

# Limited English Proficient Population Distribution



**Percent Population LEP by Census Tract**  
 Less than 7.6%  
 7.6% or Greater

The percentage of Limited English Proficient population for the entire TriMet Service District is 7.6%.

**TriMet Service**  
 MAX Light Rail  
 WES Commuter Rail  
 Frequent Service Bus Lines  
 Bus Lines  
 TriMet Service District

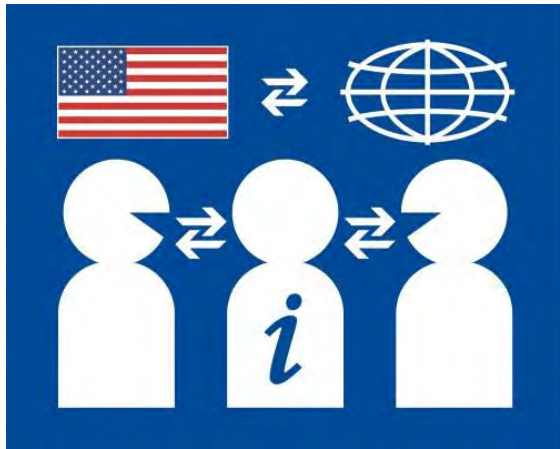
Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Data: Metro RLIS, TriMet, US Census Bureau, Table C16001 Language Spoken at Home for the Population 5 Years and Over 2016-2020 American Community Survey 5-Year Estimates  
 G:\PUBLIC\GIS\Title\_VI\Title\_VI\_Program\_Update\2022\qgis\LEP\_TriMet\_Total.qgz



7/26/22

**FIGURE I-2: LEP POPULATION AND TRIMET DISTRICT**



For Language Assistance call  
 Si necesita interprete, llame al  
 Nếu cần trợ giúp về thông dịch xin gọi  
 如需语言帮助请致电  
 Для службы языковой поддержки  
 언어 통역이 필요하시면, 으로 전화 하시면 됩니다

**503-238-7433**

FIGURE I-3: BILINGUAL LANGUAGE ASSISTANCE CHANNEL CARD



FIGURE I-4: BILINGUAL SAFETY CHANNEL CARD



## FOR YOUR SAFETY

*Para su seguridad*



**Call 9-1-1**

**Need help?** If there's an emergency or an unsafe situation on board, tell the operator or call 9-1-1.

*¿Necesita ayuda? Si hay una emergencia o una situación de inseguridad a bordo, comuníquese con el conductor o llame al 9-1-1.*



**LOOK BOTH WAYS**

**Stop, look and listen** before crossing the street or train tracks. Obey all signs and signals.

*Mire hacia ambos lados. Pare, mire y escuche antes de cruzar la calle o las vías del tren. Obedezca todos los letreros y señales.*



**Stay off the tracks.** Never play, walk, bike, hike or jog on or near the MAX, WES or Streetcar tracks.

*No camine en las vías del tren. No juegue, camine, ande en bicicleta, ni corra cerca de las vías de trenes MAX, WES o el tranvía Streetcar.*



**Riding at night?** Wear light-colored or reflective clothing and carry a cell phone, flashlight or safety strobe.

*¿Viaja de noche? Use vestimenta clara que refleje la luz y cargue su celular, linterna, o luz reflectora!*



**Heads up!** Don't be distracted by your phone, iPod or tablet. Stay alert and stay safe.

*¡Cuidado! No se distraiga con su teléfono, iPod o tableta. Manténgase alerta y cuide su seguridad.*

FIGURE I-5: BILINGUAL FOR YOUR SAFETY CHANNEL CARD



## RULES FOR RIDING

*Reglas para el viaje*



**Valid and correct fare is required.**

*Se requiere boleto apropiado y válido.*



**Don't be so loud that you disturb others.**

*No haga ruidos que molesten a los demás.*



**No eating on board, but you can bring food or drinks in closed containers.**

*No se permite comer a bordo. Puede transportar comida o bebidas en recipientes cerrados.*



**In the priority seating area, move for seniors and people with disabilities.**

*En el área de prioridad, ceda le asiento a personas de edad avanzada y personas con discapacidad.*



**Don't block the aisles or doors.**

*No bloquee los pasillos o puertas.*



**Don't threaten or intimidate riders or operators.**

*No amenace ni intimide a otros pasajeros ni al conductor.*



**Unless it's a service animal, your pet must be kept in a carrier.**

*Su mascota debe viajar en una jaula a menos que sea un animal de servicio.*

MAXIMUM PENALTY: \$250/EXCLUSION + TMC 28-29

FIGURE I-6: BILINGUAL RULES FOR RIDING CHANNEL CARDS

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English • Español • Tiếng Việt • Русский  
中文 • عربي • Română • 한국어 • 日本語  
Tagalog • 𑌆𑌇𑌃 • Somali • Українськи • فارسی

Fares and how to ride  
Tarifas y cómo viajar  
Giá vé & cách đi xe Bus, MAX  
Плата за проезд и как пользоваться  
票价以及如何乘车  
قيمة التذاكر و دليل المواصلات  
Prețul călătoriei și cum să folosiți sistemul de transport  
요금과 탑승 방법  
料金と乗車方法  
Pamasahe at kung paano sumakay  
ឥ.លៃសៃហៃ,យ នីងរៀបរយនៃយានជំនិ  
Noolka iyo sida loo raaco  
Плата за проїзд та як користуватися  
عنوان جلد چگونگی استفاده از وسایل نقلیه



Effective  
Sept. 2, 2018

FIGURE I-7: MULTILINGUAL HOW TO RIDE BROCHURE

## BOARD MEMBERSHIP AND RECRUITMENT

TriMet relies on the oversight and guidance from diverse volunteers at every level of the agency’s structure. The Board of Directors is comprised of volunteers who represent districts spanning the diversity of the agency’s service district and are nominated by the Governor and confirmed by the Oregon State Senate. To provide ongoing feedback on Transit Equity and Accessibility for Seniors/People with Disabilities, the General Manager and Board seek guidance from two additional committees: the Transit Equity Advisory Committee (TEAC) and the Committee on Accessible Transportation (CAT). Members at each level are recruited to provide diverse perspectives necessary for holistic decision-making. Board membership is presented in Table I-5 TriMet Board Membership by Race/Ethnicity below.

**TABLE I-5: TriMET BOARD MEMBERSHIP BY RACE/ETHNICITY**

Body	# of Members	White*	Hispanic	Black*	Asian*	Native American*	Hawaiian Native and Pacific Islander*	Other*
<b>Population**</b>	1,647,046	69.0%	13.1%	3.5%	8.5%	0.5%	0.5%	5.1%
<b>Board of Directors</b>	7	29%	14%	29%	29%	0%	0%	0%
<b>Finance &amp; Audit Committee</b>	3	67%	33%	0%	0%	0%	0%	0%
<b>Transit Equity Advisory Committee</b>	18	22%	28%	17%	17%	0%	0%	17%
<b>Committee on Accessible Transportation</b>	14	100%	0%	0%	0%	0%	0%	0%

\*Non-Hispanic

\*\*US Census American Community Survey 2016-2020 (5-Year Estimates) Table B03002. Hispanic or Latino Origin by Race

### Board and Committee Recruitment

**TriMet’s Board of Directors** is made up of seven members appointed by the Governor of Oregon. Board members represent, and must live in, certain geographical districts. The Board sets agency policy, enacts legislation (taxing and ordinances relating to policy ordinances) and reviews certain contracts. Recruitment and appointment is done through the Governor’s Executive Appointments Office.

The **Finance & Audit Committee** is made up of three Board members. The Committee assists the Board of Directors with oversight of TriMet’s financial strategy and objectives, the integrity of TriMet’s financial statements, the independent auditor’s qualifications and independence, and TriMet’s enterprise risk issues, programs, management practices and initiatives to ensure that systems and risk management tools are in place and functioning effectively. The Committee has an adopted



charter, and an annually adopted work plan. The TriMet Board President appoints Board members to the Finance & Audit Committee.

The **Transit Equity Advisory Committee (TEAC)** was organized in early May 2013 to extend the agency's outreach and involvement to transit dependent riders, as well as serve as a link to community organizations. TEAC also provides direction on the agency's transit equity strategy. The panel provides input and guidance on equity issues related to Title VI and Environmental Justice analysis, service planning, operational and capital investments, improving service to transit dependent riders, and disseminating information about transportation services to community-based organizations, social service agencies and community at large. Committee membership is appointed by the General Manager and currently consists of a 18-member panel (representing 18 community organizations) with one TriMet Board Member.

The **Committee on Accessible Transportation (CAT)** was formed in 1985 to advise the TriMet Board of Directors and staff on plans, policies and programs for seniors and people with disabilities. CAT has 15 community members: eight seniors and/or people with disabilities who use TriMet, six representatives of seniors and/or people with disabilities, as well as one member of the TriMet Board of Directors. All CAT members are appointed by the General Manager for a two-year term. Membership recruitment process outreach includes: 1) general notification to service agencies and organizations that serve seniors and/or people with disabilities of all races; 2) general notification to mailing list of individuals/organizations who have expressed interest in the Committee's activities; 3) specific contacts from current committee members to individuals who may be interested in serving on the Committee; and 4) placement of recruitment notice in the "Public Notice" section of local newspaper.

## SUBRECIPIENT MONITORING

To provide subrecipients of federal funds assistance and information to ensure continued compliance with all grant requirements, TriMet conducts three levels of subrecipient monitoring: project oversight, assessments and ongoing assistance.

### Project Oversight

TriMet's *Subrecipient Monitoring Procedures* outlines programmatic and fiscal responsibilities of various roles to ensure subrecipients are complying with federal requirements and are using federal funds appropriately. Oversight begins after grant applications are awarded by the federal agency and a specific accounting code is assigned by the Senior Financial Analyst, all the way through close out of the grant.

Project managers, who are ultimately responsible for the achievement of subrecipient outcomes, are involved in every step of the process by: ensuring appropriate agreements are in place, agreements contain the required federal, state and local language and verifying that performance measures and all compliance requirements are met throughout the grant period.

### Assessments

In consultation with the Civil Rights and Equity Programs Manager, the Grant Administrator performs audit assessments of subrecipients by conducting annual compliance reviews, which includes reviewing external annual audits, monthly/quarterly performance reports and Title VI plans and other documents. If results of assessments identify known or potential concerns, the Grant Administrator may conduct additional procedures such as testing payments, site audits to gain an understanding of internal controls and ensuring federal requirements are met such as procurement, equipment purchases, prevailing wages, match and suspension and debarment, when applicable.

Further, the Title VI and Equity Programs Administrator and Grant Administrator monitors and provides feedback and training to subrecipients as well as Project Managers on federal compliance requirements.

TriMet's Internal Audit Department also serves as a resource to management in providing special reviews of financial, operational and/or regulatory compliance. Upon request, Internal Audit can review selected programs and assist staff with recommendations by providing independent and objective consulting services.

## Ongoing Assistance

The Project Manager, Civil Rights and Equity Programs Manager, and/or the Grant Administrator provide ongoing assistance to subrecipients through communications, trainings (when requested), and access to subject matter experts within TriMet for information and data. Specifically, TriMet has provided the following to subrecipients:

- Demographic data to update their Title VI public participation and language assistance plans; and
- Procurement reviews to ensure federal requirements are met.

## Subrecipient Title VI Program Review

As a designated recipient of FTA funds, TriMet receives, administers and allocates funds to subrecipients and is responsible for documenting compliance with Title VI. TriMet's responsibilities include monitoring subrecipient compliance with Title VI, collecting and reviewing Title VI documents, including subrecipient Title VI data to FTA and providing assistance and support to subrecipients.

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### *From the Title VI Circular*

*In the case in which a primary recipient extends federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.*

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TriMet developed the *Subrecipient's Guide to Title VI Compliance and Title VI Compliance Template* (Attachment G) to help subrecipient's understand the federal requirements. If a subrecipient is not in

compliance with Title VI regulations, TriMet will work with the subrecipient to ensure compliance, which includes providing data, information, guidance and support for the development and formal adoption of the subrecipient Title VI program components.

To monitor Title VI compliance, TriMet:

- Documents subrecipient compliance with the general requirements;
- Collects and maintains subrecipient Title VI program documents on a designated schedule; and
- Forwards subrecipient Title VI information to the FTA, if requested.

Subrecipients are made aware of the Title VI program requirements prior to acceptance of grant funds. Subrecipients must submit a Title VI Program to TriMet within a fiscal year of their grant award (grants awarded after September 1, 2019) and every three years after initial submission on August 15. TriMet reviews all subrecipient Title VI Programs on a triennial basis and also receives and reviews annual reports submitted by August 15.

## FACILITIES SITING AND CONSTRUCTION

Since the last Title VI Program submission in 2019, TriMet has not selected any new sites meeting the applicable definitions under Title VI, and requiring an equity analysis.). TriMet's process for conducting equity analyses related to facility siting and construction follows the guidance provided in the Circular/Title 49 CFR and included below.

Currently, Title 49 CFR Section 21.9(b)(3) states,

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*In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.*

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Title 49 CFR part 21, Appendix C, Section (3)(IV) provides,

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*The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.*

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According to FTA Circular 4702.1B in order to comply with the regulations when constructing storage facilities, maintenance facilities, or operations centers.

1. Complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
3. If the recipient determines that the location of the project will result in a Disparate Impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less Disparate Impact on the basis of race, color, or national origin. The recipient must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a Disparate Impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

## MAJOR SERVICE AND FARE CHANGE EQUITY ANALYSES

TriMet considers possible equity impacts in developing potential service and fare changes, and evaluates proposals for Major Service Changes and any fare changes for potential adverse effects, Disparate Impacts, and/or Disproportionate Burdens.

Since the time of the last Title VI Program submittal TriMet has implemented several improvements to service and changes to fares. The five reports noted below cover the equity analyses of all Major Service Changes and all fare changes implemented since September 2019, and are provided as

Attachments I – M, along with corresponding documentation of the TriMet board’s consideration, awareness, and approval of each

## Part II: Title VI Policies

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This section provides the following policies and standards, as approved by the TriMet board:

1. Major Service Change Policy
2. Disparate Impact Policy
3. Disproportionate Burden Policy
4. System-wide Service Standards
5. System-wide Service Policies

Policies on Major Service Change, Disparate Impact, and Disproportionate Burden have been shared for public information, awareness, and comment. They were informed by staff presenting at several community meetings (both English and Spanish), a dedicated website<sup>5</sup>, and a questionnaire sent to community service providers in spring and summer 2019, as well as feedback gathered since TriMet’s last submittal in 2016. Information about the Title VI process, complaint procedures, and the proposed standards and policies have been made available via the TriMet website as well by calling the customer service phone number or emailing a dedicated email address.

### MAJOR SERVICE CHANGE POLICY

All changes in service meeting the definition of “Major Service Change” are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the TriMet Board of Directors for its awareness, consideration and included in the subsequent TriMet Title VI Program report with a record of action taken by the Board.

TriMet defines a Major Service Change as:

1. A change to 15% or more of a line’s route miles. This includes routing changes where route miles are either increased or reduced (i.e. re-routes), or;
2. A change of 15% or more to a line’s span of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, or;
3. A change of 15% or more to a line’s cumulative frequency of service on a daily basis for the day of the week for which a change is made as measured by revenue hours, or;
4. A single transit route is split into two or more transit routes.

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<sup>5</sup> <https://trimet.org/equity/title6update>

5. A new transit route is established as defined in the Introduction.
6. A transit route is eliminated or retired from service.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis.

The following service changes are exempted:

1. Standard seasonal variations in service are not considered Major Service Changes.
2. In an emergency situation, a service change may be implemented immediately without an equity analysis being completed. An equity analysis will be completed if the emergency change is to be in effect for more than 180 days and if the change(s) meet the definition of a Major Service Change. Examples of emergency service changes include but are not limited to those made because of a power failure for a fixed guideway system, the collapse of a bridge over which bus or rail lines pass, major road or rail construction, or inadequate supplies of fuel.
3. Experimental service changes may be instituted for 180 days or less without an equity analysis being completed. An equity analysis will be completed prior to continuation of service beyond the experimental period if the change(s) meet the definition of a Major Service Change.

## Public Participation and Board Approval

The strategy TriMet employed to inform the Major Service Change threshold in 2016 was asking community members and non-profit service providers to describe a change in the recent past from which they or the clients they serve felt the impacts (either positive or negative). The idea to lower the Major Service Change threshold to 15 percent (previously 25 percent) arose from community feedback that even relatively small service changes can have significant impacts on those who rely most on TriMet to meet their transportation needs.

In 2019, staff proposed adding the following “a transit route is eliminated or retired from service” to its Major Service Change policy. Although TriMet’s current policy is one of the most sensitive across transit agencies, this change will make the way TriMet handles major service changes an industry standard. It will also help to make the designation easier for internal staff and the public to understand. To inform the policy change, staff sought out feedback from the Transit Equity Advisory Committee and a dedicated web page.

## DISPARATE IMPACT POLICY

The Disparate Impact Policy establishes a threshold for determining whether a given action has a potential Disparate Impact on minority populations.

In the course of performing a Title VI equity analysis for possible Disparate Impact, TriMet will analyze how the proposed Major Service Change or fare change action could impact minority populations, as compared to non-minority populations.

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*Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...*

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In the event the proposed action has an adverse impact that affects minority populations more than non-minority populations at a level that exceeds the thresholds established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

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### *From the Title VI Circular*

*The [Disparate Impact] policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The Disparate Impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The Disparate Impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.*

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The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or

2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of Disparate Impact associated with service changes is defined separately for impacts of changes on individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:
  - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 32 percent compared to 29 percent).
  - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
  - a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
    - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
    - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 26 percent compared to 29 percent).
  - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, health care or public parks/recreation for minority populations.



Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize or mitigate potential Disparate Impacts, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

## Fare Changes

For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders. When minority populations or riders will experience a 10% (or more) greater adverse effect than that borne by the non-minority populations or riders, such changes will be considered to have a disparate impact. Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Differences in the use of fare options between minority populations and non-minority populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

## Public Participation and Board Approval

Feedback on this Program and the policies therein generally did not differ between how TriMet should treat analysis of disparities based on race (Disparate Impact) and income (Disproportionate Burden). Thus, the two policies remain equivalent.

In 2019, TriMet sent a questionnaire to staff at the 103 organizations participating in the agency's Access Transit fare program for low-income transit riders (see Attachment P). The questionnaire asked about Title VI program awareness, observations of changes to service or fares that have had a significant impact on clients served, thoughts on what else should be considered when making service changes, and examples of evaluating policies for potential disproportionate impacts to low-income persons and/or persons of color.

After reviewing survey responses, TriMet decided to expand its access considerations list to include parks, public recreation, and green spaces when performing an equity analysis. Moreover, participants supported the former population-based approach (i.e., looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts) as well as the inclusion of access to jobs, education, food and health care when conducting equity analysis.

## DISPROPORTIONATE BURDEN POLICY

The Disproportionate Burden Policy establishes a threshold for determining whether a given action has a potential Disproportionate Burden on low-income populations.

In the course of performing a Title VI equity analysis for possible Disproportionate Burden, TriMet will analyze how the proposed Major Service Change or fare change action could impact low-income populations, as compared to non-low-income populations.

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*From the Title VI Circular*

*The [Disproportionate Burden] policy shall establish a threshold for determining when adverse effects of fare/ service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations.... The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission....*

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In the event the proposed action has an adverse impact that affects low-income populations more than non-low-income populations at a level that exceeds the thresholds established in the adopted Disproportionate Burden Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disproportionate Burden. Given a potential Disproportionate Burden, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disproportionate Burden Policy defines measures for determination of potential Disproportionate Burden on low-income populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of Disproportionate Burden associated with service changes is defined separately for impacts of changes on individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:
  - a) A Major Service Change to a *single line* will be considered to have a potential Disproportionate Burden if the percentage of impacted low-income population in the service area of the line exceeds the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 31 percent compared to 28 percent).

- b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's low-income population that is impacted is compared to the percentage of the TriMet district's non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent greater than the percentage of the non-low-income population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
- c) A major service change to a *single line* will be considered to have a potential Disproportionate Burden if:
    - iii. The improvement is linked to other service changes that have disproportionate and adverse effects on low-income populations, or;
    - iv. The percentage of impacted low-income population in the service area of the line is less than the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
  - d) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's low-income population that is impacted is compared to the percentage of the TriMet district's non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent less than the percentage of the non-low-income population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disproportionate Burden analysis above may include evaluating impacts to accessing employment, education, or health care for low-income populations.

Upon determination of Disproportionate Burden, TriMet will either:

- c) Alter the service proposal to avoid, minimize, or mitigate potential Disproportionate Burdens, or;
- d) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disproportionate Burden on low-income riders but would still accomplish the project or program goals.

## Fare Changes

For fare changes, a potential disparate impact is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an

impact that exceeds the comparable impact on higher income riders. When low-income populations or riders will experience a 10% (or more) greater adverse effect than that borne by the higher income populations or riders, such changes will be considered to have a disparate impact. Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Differences in the use of fare options between low-income populations and higher income populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

## Public Participation and Board Approval

Feedback on this Program and the policies therein generally did not differ between how TriMet should treat analysis of disparities based on race (Disparate Impact) and income (Disproportionate Burden). Thus, the two policies remain equivalent.

In 2019, TriMet sent a questionnaire to staff at the 103 organizations participating in the agency's Access Transit fare program for low-income transit riders (see Attachment P). The questionnaire asked about Title VI program awareness, observations of changes to service or fares that have had a significant impact on clients served, thoughts on what else should be considered when making service changes and examples of evaluating policies for potential disproportionate impacts to low-income persons and/or persons of color.

After reviewing survey responses, TriMet decided to expand its access considerations list to include parks, public recreation and green spaces when performing an equity analysis. Moreover, participants supported the former population-based approach (i.e., looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts) as well as the inclusion of access to jobs, education, food and health care when conducting equity analysis.

The process to choose the 10 percent threshold for the Disproportionate Burden policy for fare changes started with researching policies from 15 comparable transit agencies and consulting with over 50 Title VI staff leads from FTA Region 9 and 10 transit agencies. The research found a range of thresholds from 5 percent to 35 percent. TriMet staff consulted with the Transit Equity Advisory Committee (April 9, 2019 and July 9, 2019) on what percentage would establish a high standard for identifying differential impacts in the event of fare changes. The feedback received noted that a percentage under 12% would be a good starting point and should serve as a baseline. Additional comments included that the policy should state that TriMet will work to minimize any potential impacts on low-income populations for all fare changes. After considering this input and how it would impact the equity analysis process going forward, TriMet opted to establish a lower threshold (10%) for fare changes. TriMet also opted to not include major and minor fare change definitions given the minimal support from TEAC and community partners.

# Part III: System-Wide Service Policies and Standards

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In December 2014, the TriMet Board adopted the following five priority considerations for service planning decision-making (Attachment N provides TriMet's full Service Guidelines Policy):

- Equity
- Demand
- Productivity
- Connections
- Growth

These considerations guide how TriMet identifies and executes service changes, and are incorporated into each year's Annual Service Plan.

Beyond these priority considerations, TriMet has also established standards and policies as set forward in FTA Circular 4702.1B covering:

Standards:     Vehicle Loads  
                  Service Frequency  
                  On-Time Performance  
                  Service Availability

Policies:        Distribution of Amenities  
                  Vehicle Assignment

These standards and policies assist in guiding the development and delivery of service in support of TriMet's mission to provide valued transit service that is safe, dependable, and easy to use. They also provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. They establish a basis for monitoring and analysis of service delivery, availability, and the distribution of amenities and vehicles to determine whether or not any Disparate Impacts are evident.

Each standard and policy is described, following. Please refer to Part IV: Service Monitoring for a description of the current analysis of performance/outcomes for each respective standard and policy, comparing the service and amenities provided for minority and non-minority populations respectively, and the conclusions in regard to any Disparate Impacts.

## STANDARD – VEHICLE LOADS

Standards for passenger capacity are used to determine if a bus or train is overcrowded. Table III- III-1 shows passenger capacities for buses, light rail cars, and commuter rail cars as the average

maximum numbers of persons seated and standing during the peak one-hour in the peak direction. Maximum load factors represent the maximum achievable capacity, and are calculated by dividing the total capacity by the seated capacity of the vehicle.

Vehicle passenger load is measured by the average load and the ratio of average load to seated capacity (load/seat ratio) during weekday a.m. peak, midday, and p.m. peak periods, respectively. Maximum load factors should not be exceeded during any period, including a.m. and p.m. peak periods on weekdays when highest passenger loads are typically experienced.

Bus and MAX loads are monitored using automatic passenger counters linked to vehicle location technology. WES passenger counts are taken by a train crew member.

**TABLE III-1: VEHICLE CAPACITIES BY MODE AND TYPE**

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Achievable Capacity	Maximum Load Factor
30-ft. Bus	28	2	30	1.1
40-ft. Bus	39	12	51	1.3
MAX Light Rail 2-Car Train	128	138	266	2.1
WES Commuter Rail - 1 Car Train	70	0	70	1.0
WES Commuter Rail - 2 Car Train	146	0	146	1.0

*Notes: All MAX operates as 2-car trains. WES may operate as a single-car or a 2-car train.*

## STANDARD – SERVICE FREQUENCY

Vehicle headway is the measurement of the frequency of service and is the scheduled time between two vehicles traveling in the same direction on the same line at a given location.

TriMet headway standards for lines designated as “frequent service” is that these lines should operate 15-minute or better service for most of the day, seven days a week.

In 2003 TriMet worked with stakeholders and adopted criteria to guide the expansion of frequent service. The most important factor in the criteria is potential ridership, but another consideration is the density of transit-dependent population as measured by proportion of low-income residents, seniors, or persons with disabilities. To meet the criteria for frequent service, a line must be projected to generate high ridership and serve areas with high employment/population density; areas with streets that are friendly to pedestrians and transit service; areas with a high proportion of transit

dependent population and activities, and areas that meet other criteria specified in TriMet’s Service Guidelines Framework.

Seventeen bus lines and all five MAX lines are considered frequent service. TriMet has not adopted headway standards for lines that do not meet the criteria for frequent service; however, at minimum lines should operate with headways of no more than 60 minutes during weekday peak periods.

Due to budget constraints resulting from the Great Recession, beginning in 2009 TriMet was forced to reduce service on most frequent service bus and MAX lines during off-peak hours and on weekends. However, because TriMet made a commitment to prioritize the restoration of frequent service once resources were available, the agency has now fully restored this service to 15 minutes or better, most of the day, every day. Additionally, TriMet maintained 15 min. or better service on all Frequent Service Lines during the COVID-19 pandemic.

Given that MAX lines and frequent service bus lines are designed and operated to serve maximum ridership, these lines also serve above-average shares of minority and poverty populations. Frequent service bus lines and all MAX lines taken together serve 68 percent of the population of the TriMet Service District (about 1,088,000 of a total of 1.6 million). Among minority populations living in the TriMet district, 75 percent are served by at least one Frequent Service line, while 88 percent of people living with a low-income are served by at least one Frequent Service line.

## **STANDARD – ON-TIME PERFORMANCE**

TriMet has established measures and standards for on-time performance of bus, MAX light rail and WES commuter rail service. For bus and MAX service, on-time is defined as vehicle arrivals no more than one minute before to five minutes after scheduled time at all points. TriMet’s on-time performance objective is 90 percent or greater. TriMet continuously monitors for on-time performance and system results are included as part of monthly performance reports covering all aspects of operations. For WES commuter rail, train arrivals at the respective end-of-line stations are noted and all arrivals no more than four minutes before or after the scheduled time are considered as on-time. Reliability has increased significantly with the reduction in traffic due to the COVID-19 pandemic. Reliability is expected to decrease somewhat as the pandemic continues to subside and more people are driving again. As a result, TriMet and the City of Portland have been adding “bus only” lanes throughout the city to help sustain the improved reliability gained during the pandemic.

## **STANDARD – SERVICE AVAILABILITY**

TriMet’s standard for availability of service is that persons residing within one-half mile of bus stops and/or rail stations are considered served. Service availability is expressed as number and percentage of District-wide population and is determined by mode; for bus, MAX, and WES respectively. The calculation of distance is based on March 2018 stop locations and the residential address points within a half-mile buffer around stops. There is no absolute standard for service availability; however the expectation in the context of Title VI is that the share of minority population within the TriMet

District with service available should be no less than the share of non-minority populations with service available.

## AMENITY PLACEMENT GUIDELINES

TriMet has written guidelines that form a framework for the deployment of amenities as part of its projects and programs. The following sections briefly summarize the major policy documents that govern the deployment of amenities on TriMet transit system. Note that the use of the term amenities is limited to the Title VI definition for the purposes of this document. This section is generally organized by mode, but also includes a summary of customer information deployment policy. It should also be noted that project development often requires a scope of deliberation regarding amenities placement to include considerations not accounted for in these written policies.

### Bus Stop Classification Guidelines

It is important that bus stops are easily identifiable, safe, accessible and a comfortable place to wait for the bus. TriMet’s Bus Stop Classification Guidelines (Table III-2) identify elements of the TriMet bus stop, set guidelines for the design of bus stops and the placement of bus stop amenities, and describe the process for managing and developing bus stops.






Stop Type	Illustration	Externally Managed Features	Potential Bus Stop Features	Stop Conditions & Usage
Under-Developed		No clear pedestrian access; no logical, safe street crossing; constrained topography	No pavement; inadequate shoulder; visibility blocked; poor lighting; insufficient ADA clearances; exposure to weather/traffic; shared pole	Poor, or lack of, supporting land uses; few or no boarding rides; closely spaced with another stop
Basic		Legal street crossing (corner ramps); sidewalk or safe shoulder access	Pavement meets ADA clearances; most bus stop signs on dedicated poles; free standing bench	All stops meeting siting criteria
Level 1		<i>Preceding features plus:</i> sidewalk connections; curb extensions; crosswalks	<i>Preceding features plus:</i> Standard (A or B) shelter (larger if justified); shelter lighting; rear door landing when physically possible	High use stops (50+ Ons/day); significant employer program participant; apartments; institutions; hospitals; shopping centers; major business; stops with significant usage by riders who are disabled or elderly
Level 2		<i>Preceding features plus:</i> transit plazas and active public space	<i>Preceding features plus:</i> double B or higher capacity shelter; printed schedule; trash can; additional free standing bench	Major stops (150+ Ons/day); transfer points; stops with significant bus ramp usage
Level 3		<i>Preceding features plus:</i> concession or nearby shop(s); landscaping; robust public and pedestrian infrastructure	<i>Preceding features plus:</i> high capacity shelter; free standing bench(s); bike storage lockers; artwork elements	High Capacity Stops (250+ Ons/day) Bus Rapid Transit service; transit centers; major transfer hubs; transit mall

TABLE III-2: BUS STOP CLASSIFICATION GUIDELINES - 2018

## LIGHT RAIL (“MAX”) STATION DESIGN

TriMet’s Design Criteria governs the design of light rail projects including requirements for amenities. The following is a summary of the deployment requirements by type of amenity.



Seating – Provide benches on platforms and in bus waiting areas (associated with light rail stations); benches are to be 5’ in length with a mid-armrest

Shelters/canopies – Criteria text does not specifically require the provision of shelters, but practice has been to provide cover at light rail stations. Cover is often provided by one or more stand-alone shelters on the platform, but has also provided by cover mounted to adjacent buildings. Stand-alone shelters vary in size. Two stand-alone shelters is the most typical practice, but single stand-alone structures and building mounted canopies have also been used.

Escalators – There are no escalators on TriMet’s system. As such there are no specific criteria related to their deployment.

Elevators – Criteria reference the ADA with respect to deployment of elevators. In practice, TriMet seeks to limit deployment of elevators to only those situations where specifically required by ADA and/or necessary because of project constraints, due to security and maintenance concerns.

Trash Cans – Criteria requires deployment of two 33-gallon “waste receptacles” (trash cans) at all light rail station platforms; while no standard product is cited, criteria includes an extensive list of performance characteristics including 20-year life expectancy, low-life cycle cost, high quality design, considering security, and others that in practice result in high quality receptacles being consistently deployed.

## COMMUTER RAIL (“WES”) DESIGN

TriMet has one commuter rail line. There is no mode-specific policy guidance exists for amenities associated with commuter rail. In practice, the design of the WES project considered the light rail design criteria and followed them where practical, relevant, and possible in consideration of the other constraints of the project. See Light Rail Station Design, preceding, for a summary.

## CUSTOMER INFORMATION

TriMet’s Design Criteria governs the design of light rail projects, is also a key reference for Commuter Rail, and contains the bulk of requirements for customer information items for signage and graphics. TriMet’s Bus Stops Guidelines govern the design of bus stops and contains considerations for customer information. Subsections below summarize typical customer information deployment practices by mode. In addition to these practices, TriMet also considers unique usage factors, transfer locations, service frequency, schedule reliability, special needs, and the specific location of a given stop along a route when identifying placement of customer information amenities.

### Bus

Bus catcher information displays (BCIDs): Displays that include route number; route name; direction; route-specific maps; route schedules; stop name; Stop ID numbers for use with TransitTracker™ via phone, text or at trimet.org; and call-to-action. BCIDs are placed at bus stops with minimum boarding rides of 100 per day, at Transit Centers where multiple bus lines converge, as well as rail at some locations.

Variable stop ID signs: Signs include route number; route name; direction; stop name; Stop ID number for use with TransitTracker™ via phone, text or trimet.org; and call-to-action. These signs are located at bus stops where a standard blue bus stop pole and/or shelter unit is unable to be installed due to existing environmental constraints.

Pole-mounted information displays: Displays that include route number; route name; direction; stop name; simple route map; Stop ID number for use with TransitTracker™ via phone, text or trimet.org; and call-to-action and are placed at all bus stops without BCIDs or variable stop ID signs.

Digital equipment such as electronic real-time arrival displays: Displays are placed along bus routes in complicated transit environments such as high traffic transit centers, the Portland Transit Mall, and private investment partnerships (e.g. Go Lloyd and OHSU).

## Light and Commuter Rail

Pylon information displays: Two-side or four-sided displays that include a rail-specific map; route schedules or frequency charts; Stop ID numbers for use with TransitTracker™ via phone, text or trimet.org; and call-to-action. These are placed at all MAX and WES stations.

Digital equipment such as electronic arrival displays next vehicle arrival displays: Displays are placed along rail/fixed guideway stations at all stations built since 2004. A retrofitted installation of displays at stations that currently have no electronic information began in fall 2013, in approximate order of higher to lower ridership. Stations included in the Blue Line Station Rehabilitation Project (from Hollywood/NE 42nd to Cleveland station) that do not already have displays will receive them as part of that project. Some stations have existing environmental constraints that may delay the installation of electronic information.

## VEHICLE ASSIGNMENT

Assigning vehicles to routes involves several considerations. Vehicles are domiciled at each of the three bus maintenance facilities (Center, Powell and Merlo). For buses, ridership is the primary determinant, so those communities with the greatest need for and use of transit generally are served by newer vehicles. TriMet's fleet as of May 2022 includes 696 buses, all of which are low-floor and are equipped with automated stop announcement systems.

Bus assignments also take account of the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are best operated with 30-foot rather than 40-foot buses.

For MAX light rail, vehicles are based at each of the two rail maintenance facilities (Ruby Junction and Elmonica) and are assigned to respective rail lines based on lines served by the facility, daily car availability, and operational efficiency. TriMet's light rail fleet includes 144 train cars of which 119 are low-floor. All cars are equipped with air conditioning, and high-floor cars are always paired with a low-floor car to provide ADA accessibility.

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### *From the Title VI Circular*

*Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.*

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TriMet's WES commuter rail fleet includes three self-powered diesel-multiple units (DMUs) and one "trailer" non-powered car which were built in 2007 and placed in operation with the start of WES service in 2009. Two additional cars (a "married pair") were built in 1952 and 1953 and were placed in operation in 2011.

In regard to assessing the results of TriMet's vehicle assignment practices in the context of Title VI, the policy is that the average age of vehicles on "minority lines" should be no more than the average age of vehicles on "non-minority" lines. Additionally, TriMet has set the expectation that the average age of vehicles on "low-income lines" should be no more than the average age of vehicles on "higher income" lines.

As of May 2022, TriMet operates 11 completely electric busses serving lines 6, 20, and 62, which are considered minority lines. As TriMet looks to phase in all non-diesel buses, the assignment strategy will consider how these vehicles are deployed throughout the service area to ensure equitable distribution.

# Part IV: Service Monitoring

Part of TriMet’s compliance with FTA Circular 4702.1B is ongoing performance monitoring across all modes of service (bus, MAX, and WES). This monitoring is meant to ensure that TriMet is providing service in a way that does not discriminate on the basis of race, color, or national origin.

As shown in Figure IV-1, the Title VI equity rating scale rubric ranges from “outstanding”, “good”, “fair”, “marginal” to “adverse impact”. To receive an “outstanding” score, access or service distribution for minority and low-income must be good as or better than non-minority and higher income for each measure. A performance finding within the 5% threshold is considered “good”. The target for TriMet’s Business Plan objective is within 5% or better. A greater than 5% but less than 10% difference equates to “fair”. Above the 10% threshold but within 20% would result in a “marginal” score. A marginal score would be flagged as a caution and area for improvement. Any measure that exceeds 20% would indicate “adverse impact” and would result in a system-wide disparate impact/disproportionate burden finding per the FTA. TriMet will work to improve service and access on an on-going basis to ensure TriMet’s equity targets are achieved and for compliance with TriMet’s Title VI Program.

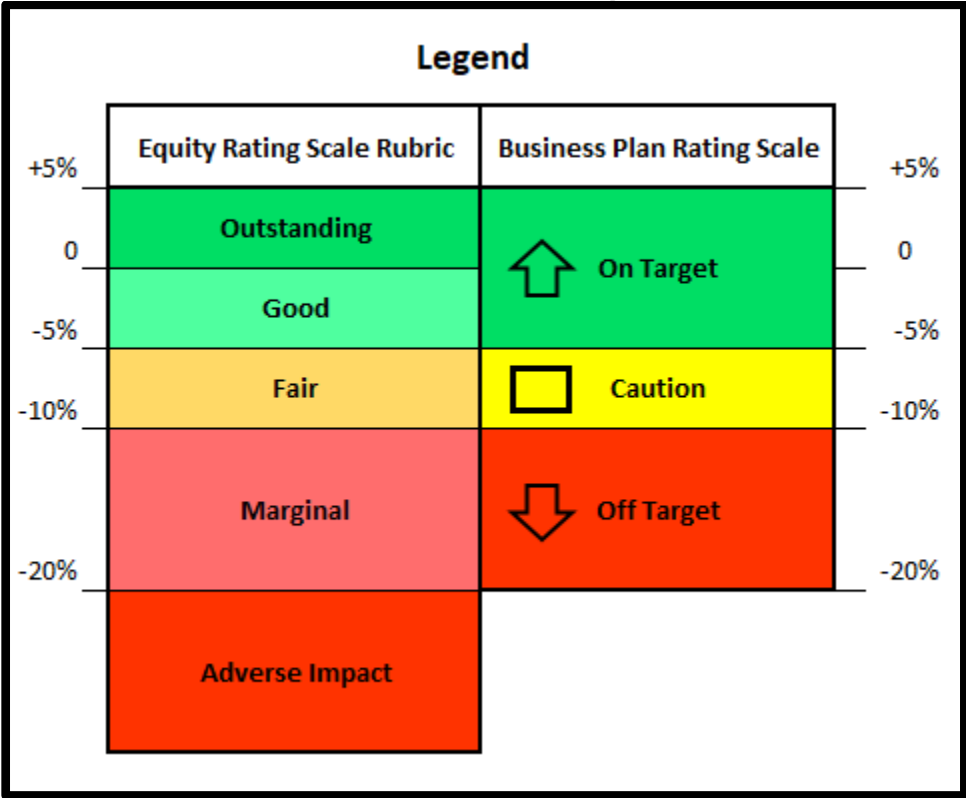


FIGURE IV-1: TITLE VI EQUITY RATING SCALE RUBRIC

TriMet monitors the following service and performance metrics:

1. “Minority” and “Non-minority” lines
2. “Low-income” and “Higher income” lines
3. Service frequency and span
4. On-time performance
5. Vehicle loads
6. Service availability
7. Stop amenities
8. Vehicle assignment

## 1. MINORITY & NON-MINORITY LINES

“Minority” lines, as defined by the FTA, are lines that provide at least 1/3 of their service (measured by revenue hours) in block groups that are above-average minority population. “Non-minority” lines are all others.

Currently, TriMet operates a total of 91 lines, including 83 bus lines, 5 MAX light rail lines, and 1 WES commuter rail line. Of these, 47 bus lines, 4 MAX lines, and WES commuter rail are considered minority lines. The remaining 39 bus lines and 1 MAX line are considered non-minority lines. In the Spring 2016 report, WES had been considered a non-minority line, but updated data from the 2012-2016 American Community Survey indicates a change in demographics around station areas to a higher percentage minority population.

As of Spring 2022, Minority lines account for 66% of TriMet system service (measured by revenue hours). TriMet generally aligns service with mobility needs and ridership, thus lines serving areas with above-average minority populations typically have higher ridership and therefore a higher overall level of service than non-minority lines.

## 2. LOW-INCOME & HIGHER INCOME LINES

“Low-income” lines are lines that provide at least 1/2 of their service (measured by revenue hours) in block groups that are above-average low-income population. 49 bus lines, 5 MAX lines, and the WES commuter rail are considered low-income lines, and accounted for 78% of TriMet’s service in the Spring of 2022. The remaining 36 bus lines are considered higher income lines.

As of Spring 2022, Low Income lines accounted for 88% of TriMet system service (measured by revenue hours), and 90% of system boarding rides.

## 3. SERVICE FREQUENCY & SPAN

The analysis of service frequency and span is by mode of service (bus, MAX, WES) and day of service (weekday, Saturday, Sunday). As shown in Tables IV-1 through IV-3 following, the frequency and time span of service is noted for minority and non-minority lines, with comparisons during each time period and for weekday, Saturday, and Sunday.

## Findings

1. Weekday service on minority bus lines is more frequent than service on non-minority lines during all time periods with the exception of minority MAX lines during early AM.
  2. Saturday service on minority bus lines is more frequent than service on non-minority lines during all time periods with the exception of minority MAX lines during the day.
  3. Sunday service on minority bus lines is more frequent than service on non-minority lines during all time periods with the exception of minority MAX lines during the night and minority bus lines during early AM.
  4. A higher proportion of minority bus lines operate on Saturday (56 percent) and Sunday (56 percent) than non-minority bus lines on Saturday (52 percent) and Sunday (43 percent). All MAX lines operate on Saturday and Sunday.
  5. The average span of service (hours lines are serving riders from start to end of service) on minority lines exceeds the span of service on non-minority lines for bus and MAX on weekdays and Sundays. The average span of service on non-minority lines exceed the span of service on minority lines for bus and MAX on Saturdays
- Minority lines on average provide more frequent service and span of service compared to non-minority lines. Thus, there are no Disparate Impacts on minority population in regard to frequency or span of service on bus, MAX or WES.

**Table IV-1: Frequency and Span of Service**  
 Minority and Non-Minority Transit Lines by Mode and Day of Service  
 Fall 2018 Service – Weekdays Only

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Week-day Lines in Service	Average Frequency of Service (mins.) <sup>1</sup>						Span of Service (hours) <sup>2</sup>
					Early AM	AM Peak	Midday	PM Peak	Evening	Night	
Weekday	<b>Bus</b>	Minority Lines	41	100%	29	30	34	30	29	38	15.3
		Non-Minority Lines	42	100%	31	31	39	34	33	41	14.5
		All Bus lines	83	100%	30	30	36	32	31	39	14.9
	<b>MAX Light Rail</b>	Minority Lines	3	100%	19	12	14	12	14	21	22.2
		Non-Minority Line	2	100%	15	13	15	13	15	21	20.7
		All MAX Lines	5	100%	18	12	14	12	14	21	21.6
	<b>WES Commuter Rail</b>	Non-Minority Line	1	100%	30	30	30	30	30		9.2
	<b>System</b>	Minority Lines	45	100%	28	28	32	29	28	36	15.6
		Non-Minority Lines	44	100%	30	30	37	33	33	39	14.8
All Lines		89	100%	29	29	35	31	30	37	15.2	

**Notes:**

<sup>1</sup> Early AM = Start to 6:59 am; AM Peak = 7-8:59 am; Midday = 9 am - 3:59 pm; PM Peak = 4-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

<sup>2</sup> Span of Service includes only the hours when lines are serving riders. For most lines, this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.

**Table IV-2: Frequency and Span of Service**

Minority and Non-Minority Transit Lines by Mode and Day of Service  
Fall 2018 Service – Saturday Only

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Average Frequency of Service (mins.) <sup>1</sup>				Span of Service (hours) <sup>2</sup>
					Early AM	Day	Evening	Night	
Saturday	<b>Bus</b>	Minority Lines	23	56%	40	31	32	39	15.8
		Non-Minority Lines	22	52%	42	33	36	42	17.6
		All bus lines	45	54%	41	32	33	40	16.7
	<b>MAX Light Rail</b>	Minority Lines	3	100%	25	16	15	19	21.5
		Non-Minority Line	2	100%	25	15	15	19	21.8
		All MAX lines	5	100%	25	15	15	19	21.6
	<b>System</b>	Minority Lines	26	58%	37	29	29	36	16.6
		Non-Minority Lines	24	55%	40	32	33	39	17.8
		All lines	50	59%	38	30	31	37	17.2

**Notes:**

<sup>1</sup> Early AM = Start of service to 7:59 am; Day = 8 am-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

<sup>2</sup> Span of Service includes only the hours when lines are serving riders. For most lines, this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.



**Table IV-3: Frequency and Span of Service**  
 Minority and Non-Minority Transit Lines by Mode and Day of Service  
 Fall 2018 Service – Sunday Only

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Average Frequency of Service (mins.) <sup>1</sup>				Span of Service (hours) <sup>2</sup>
					Early AM	Day	Evening	Night	
Weekday	<b>Bus</b>	Minority Lines	23	56%	43	32	33	42	16.9
		Non-Minority Lines	18	43%	41	33	36	45	15.9
		All bus lines	41	49%	42	32	34	43	16.5
	<b>MAX Light Rail</b>	Minority Lines	3	100%	29	16	15	23	22.2
		Non-Minority Line	2	100%	29	16	15	21	20.7
		All MAX lines	5	100%	29	16	15	22	21.6
	<b>System</b>	Minority Lines	26	58%	40	30	31	38	17.5
		Non-Minority Lines	20	44%	38	31	33	41	16.4
		All lines	46	54%	39	30	32	40	17

**Notes:**

<sup>1</sup> Early AM = Start of service to 7:59 am; Day = 8 am-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

<sup>2</sup> Span of Service includes only the hours when lines are serving riders. For most lines, this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.

## 4. ON-TIME PERFORMANCE

TriMet continuously monitors on-time performance on bus and MAX through CAD-AVL systems, and by direct observation on WES. TriMet defines “on-time” as no more than five minutes late or one minute early. In this analysis, the on-time performance for bus and MAX lines is compared between minority/non-minority and low-income/higher income lines on weekdays, Saturday, and Sunday (Table IV-4 & Table IV-5). WES commuter rail on-time data includes all service, weekdays.

**Table IV-4: On-Time Performance**  
 Minority and Non-Minority Transit Lines by Mode and Day of Service  
 Weekday, Saturday, Sunday  
 Fall 2021 Service

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Minority to Non-Minority +/-(-)
		Minority Lines	Non-Minority Lines	
Bus	Weekday	90.97%	89.23%	2
	Saturday	91.86%	90.96%	1
	Sunday	93.33%	93.95%	(1)
MAX Light Rail	Weekday	88.43%	91.00%	(2)
	Saturday	86.95%	86.10%	(2)
	Sunday	86.75%	89.40%	(2)
WES Commuter Rail	Weekday	99.30%	n/a	n/a

Notes:

<sup>1</sup>For Bus and MAX service, a vehicle is considered “on time” if it departs no more than 1 minute before to 5 minutes after the scheduled time measure at time points. For WES, trains that arrive at the end-of-line stations (Beaverton Transit Center or Wilsonville) no more than 4 minutes before or after the scheduled time are considered “on time”. Weighted by revenue vehicle hours.

### Findings

1. Minority bus lines’ on-time performance is slightly higher than the performance on non-minority bus lines for weekdays and Saturdays, and slightly lower than non-minority bus lines on Sundays.

2. MAX on-time performance for the four minority lines is somewhat lower than the performance of the one non-minority line during weekdays, Saturdays, and Sundays.
3. WES on-time performance is 99.3 percent.

While bus on-time performance indicates no Disparate Impact on minority riders, MAX shows slightly lower performance on minority lines because the one non-minority line is the newest in the system. The differences are within the established system-wide Disparate Impact threshold of 20 percent. Nonetheless, TriMet has recently launched a broad initiative to improve on-time performance for the MAX system, which should serve to make all MAX lines more comparable.

**Table IV-5: On-Time Performance**  
 Low-income and Higher Income Transit Lines by Mode and Day of Service  
 Weekday, Saturday, Sunday  
 Spring 2022 Service

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Low Income to Higher Income +/-
		Low Income Lines	Higher Income Lines	
Bus	Weekday	90.91%	90.22%	1
	Saturday	92.55%	91.59%	1
	Sunday	94.25%	94.25%	0
MAX Light Rail	Weekday	88.36%	n/a	n/a
	Saturday	86.52%	n/a	n/a
	Sunday	88.54%	n/a	n/a
WES Commuter Rail	Weekday	99.3%	n/a	n/a

Notes:

<sup>1</sup>For Bus and MAX service, a vehicle is considered “on time” if it departs no more than 1 minute before to 5 minutes after the scheduled time. For WES, trains that arrive at the end-of-line stations (Beaverton Transit Center or Wilsonville) no more than 4 minutes before or after the scheduled time are considered “on time”. Weighted by revenue vehicle hours.

## Findings

1. On-time performance is generally comparable for both bus lines with OTP on Weekdays and Saturday being slightly better for low income routes.
2. All MAX lines are considered low-income.
3. WES on-time performance is 99.3 percent.

- The average on-time performance for bus, MAX and WES Commuter Rail indicate no Disproportionate Burden on low-income riders

## 5. VEHICLE LOADS

Vehicle loads are examined to determine whether buses or trains are overcrowded. Table IV-6 shows vehicle capacities (including both seating & standing), Table IV-7 compares average vehicle loads for minority and non-minority lines during the A.M. Peak, Midday, and P.M. Peak times. Table IV-8 compares vehicle loads for low-income and higher incomes lines for the same times.

**TABLE IV-6: VEHICLE CAPACITIES BY MODE AND TYPE**

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Achievable Capacity	Maximum Load Factor
30-ft. Bus	28	2	30	1.1
40-ft. Bus	39	12	51	1.3
MAX Light Rail 2-Car	128	138	266	2.1
WES Commuter Rail - 1 Car Train	70	0	70	1.0
WES Commuter Rail - 2 Car Train	146	0	146	1.0

*Notes: All MAX operates as 2-car trains. WES may operate as a single-car or a 2-car train.*

**Table IV-7: Vehicle Loads**  
 Minority and Non-Minority Transit Lines  
 Spring 2022 Service

Vehicle Type	Time Period	Minority Lines		Non-Minority Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.31	9.41.48	0..26	9.49
	Midday	0.23	8.751	0.21	7.71
	PM Peak	0..26	9.96	0.24	9.03
MAX Light Rail (128 seats)	AM Peak	0.31	39.50.44	.34	43.00
	Midday	0.34	43.63	.27	34.00

	PM Peak	.47	159.88	0.34	4.00.62
WES Commuter Rail (146 seats)	AM Peak	0.17	18.00	n/a	n/a
	PM Peak	0.29	21.00	n/a	n/a

<sup>1</sup>AM Peak = 7:00 - 8:59 am; Midday = 9:00 am - 3:59 pm; PM Peak = 4:00 - 5:59pm

## Findings

1. Average load/seat ratios range from a low of 0.36 to a high of 1.15. While the load-to-seat ratio is above 1.0 for the non-minority MAX line during AM Peak and for minority MAX lines during PM Peak, all modes are below the maximum load factor for every time period and across both minority and non-minority lines.
  2. Minority lines have somewhat smaller loads than non-minority lines across all time periods, with the exception of Midday and PM Peak MAX. Observed loads on both groups of lines are well within the established maximum load factor standards.
- Thus, there is no Disparate Impact on minority population in regard to vehicle loads.

**Table IV-8: Vehicle Loads**  
Low-income and Higher Income Transit Lines  
Spring 2022 Service

Vehicle Type	Time Period	Low-Income Lines		Higher Income Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.30	11.60	0.19	6.6.04
	Midday	0.25	9.61	0.17	6.39
	PM Peak	0.31	11.84	0.18	6.54
MAX Light Rail (128 seats)	AM Peak	0.31	40.20	n/a	n/a
	Midday	0.33	41.70	n/a	n/a
	PM Peak	0.44	56.50	n/a	n/a
WES Com-muter Rail (146 seats)	AM Peak	0.17	18.00	n/a	n/a
	PM Peak	0.29	21.00	n/a	n/a

## Findings

1. Average load/seat ratios range from a low of 0.17 to a high of 0.99.44.
2. Low-income lines have larger loads than higher income lines across all time periods. Observed loads on both groups of lines are well within the established maximum load factor standards.

- Thus, there is no Disproportionate Burden on low-income population in regard to vehicle loads.

## 6. SERVICE AVAILABILITY

TriMet considers persons residing within one-half mile of bus stops and/or rail stations as having service available. Service availability is expressed as number and percentage of District-wide population and is determined by mode; for bus, MAX, and WES respectively. Table IV-9 on the next page presents the availability of service by mode for Fall 2021 service.

### Findings

1. The percent of minority population with service available exceeds that of the non-minority populations for bus (90 percent vs. 87 percent), MAX (19 percent vs. 15 percent) and WES (1.2 percent vs. <1 percent).
  2. The percent of low-income population with service available exceeds that of the higher income populations for bus (93 percent vs. 87 percent), MAX (24 percent vs. 15 percent) and WES (1.3 percent vs. <1 percent).
- Thus, there are no Disparate Impacts on minority population or Disproportionate Burdens on low-income population in regard to availability of service on bus, MAX or WES.

**Table IV-9: Availability of Service by Mode**  
 Minority/Non-Minority and Low-Income/Higher Income Population  
 TriMet District  
 Fall 2021 Service

Demographic Analysis of Proximity to TriMet Service (percent)		TM District		Percent within 1/2* Mile of...			Frequent Service	
		Totals (raw num)	Totals (pct.)	Bus	MAX	WES	Bus	Bus & MAX
<b>Popula- tion</b>	Total (ACS 5 year estimate, 2016-2022)	1,647,046	100.0%	88.1%	16.4%	0.9%	51.5%	67.9%
<b>Minority</b>	All Minorities**	511,388	31.0%	89.9%	19.4%	1.2%	55.0%	74.4%
<b>Non-Mi- nority</b>	White (Non-Hispanic)	1,135,659	69.0%	87.4%	15.1%	0.7%	49.9%	65.1%
<b>Popula- tion</b>	Total population with known income (ACS 5 year estimate, 2016-2020)***	1,625,299	100.0%	88.1%	16.3%	0.9%	51.3%	67.7%
<b>Income</b>	Below 150% of Poverty Level	277,968	17.1%	93.1%	23.5%	1.3%	65.4%	88.8%
<b>Income</b>	Above 150% of Poverty Level	1,347,331	82.9%	87.1%	14.9%	0.8%	48.4%	63.3%

**Sources:** TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2016 - 2020 (5-Year Estimates), Table B03002. Hispanic or Latino Origin By Race, and Table C17002. Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data)

To adjust for the fact that some census block groups are only partially within the TriMet Transit District, staff estimated the fraction of each block group's population within the transit district by calculating the percentage of residential address points that fell within the district. Staff then multiplied this address fraction by the Census counts to get the estimated TriMet District population. Staff used Oregon Metro's Master Address File (with non-residential and vacant addresses removed) as the address points for this analysis.

\* Distance calculations based on December 2021 stop and station locations. Similar to the TriMet District level population estimates, we multiplied each block group's counts by the fraction of addresses within it that also fell within a half-mile buffer of a transit stop of the specified type.

\*\* All Minorities include Black (non-Hispanic), Hispanic, Asian (non-Hispanic), Native American (non-Hispanic), Hawaiian Native and Pacific Islander (non-Hispanic), and Other (Including Mixed Race, non-Hispanic).

\*\*\* Population totals for the TriMet district vary between statistics for race and income/poverty in part due to the fact that the Census is a full count and the ACS is an extrapolation based on a sample, and in part because the ACS total excludes those whom poverty status is not determined.





## 7. STOP AMENITIES

TriMet analyzes the distribution of stop amenities in the TriMet system (shelters, seating, waste receptacles, et al.) in order to identify any potential disparities. Table IV10 shows the percentage of stops along minority and non-minority lines containing each amenity. Table IV-11 shows the percentage of stops along low-income and higher income lines containing each amenity.

**Table IV-10: Stop Amenities on Minority and Non-Minority Lines  
Spring 2022**

<b>Category of Amenity</b>	<b>Pct. of Stops on Minority Lines</b>	<b>Pct. of Stops on Non-Minority Lines</b>
Seating	39%	29%
Lighting	57%	64%
Elevators	<1%	<1%
Digital Displays	8%	4%
Shelters	21%	15%
Signs, Maps and/or Schedules	90%	85%
Waste Receptacles	17%	11%

**Table IV-11 Stop Amenities on Low-Income and Higher Income Lines  
Spring 2022**

<b>Category of Amenity</b>	<b>Pct. of Stops on Low-Income Lines</b>	<b>Pct. of Stops on Higher Income Lines</b>
Seating	40%	25%
Lighting	60%	61%
Elevators	<1%	0%
Digital Displays	9%	3%
Shelters	23%	9%
Signs, Maps and/or Schedules	90%	84%

Waste Receptacles	19%	7%
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## Findings

1. The percentage of stops containing each amenity on minority lines exceeds the percentage for non-minority lines in all categories examined with the exception of lighting, which is higher for non-minority lines (64 percent compared to 57 percent of stops). However, this is within the system-wide Disparate Impact threshold of 20%.
  2. The percentage of stops containing each amenity on low-income lines exceeds the percentage for higher income lines in all categories examined with the exception of lighting, which is slightly higher for higher-income lines (61 percent compared to 60 percent of stops). However, this is within the system-wide Disparate Impact threshold of 20%.
- Thus, there is no Disparate Impact on minority population or Disproportionate Burden on low-income population in regard to the distribution of amenities.

## 8. VEHICLE ASSIGNMENT

In regard to assessing the results of TriMet’s vehicle assignment practices in the context of Title VI, the vehicle assignment policy is that the average age of vehicles on minority lines should be no more than the average age of vehicles on non-minority lines. For bus and MAX, average age is calculated by weighting the age of vehicles by the number of hours in service. For WES, the age of primary and spare vehicles are listed separately because vehicle assignment is done differently than for the other modes. Vehicle assignment for minority and non-minority lines is shown in Table IV-12.

**Table IV-13: Vehicle Assignment**  
Average Age of Vehicles Assigned by Mode  
Spring 2022 Service

Mode of Service	Avg. Age of Vehicles (Years)		Difference; Minority to Non-Minority +/-(-)
	Minority Lines	Non-Minority Lines	
Bus	7.26	6.45	(.81)
MAX Light Rail	20.17	21.04.1	(1.87
WES Com-muter Rail	Primary: 15.5.0 Spares: 70.0	n/a	n/a

## Findings

1. The average age of vehicles on minority bus lines (7.26 years) is about 13% older than the average age of vehicles on non-minority bus lines (6.45 years). This is within the system-wide Disparate Impact threshold of 0%.
  2. The average age of vehicles on minority MAX lines (20.17 years) is about 4% newer than the average age of vehicles on non-minority MAX lines (21.1 years).
  3. For WES, TriMet does not maintain a detailed database of specific vehicles used for specific trips. The four main vehicles used for WES service were all built in 2007; the remaining two were built in 1952 and 1953 and are typically used as spares. WES is a non-minority line.
- Thus, there are no Disparate Impacts on minority population in regard to vehicle assignment on bus, MAX or WES.

Additionally, TriMet’s expectation is that the average age of vehicles on low-income lines should be no more than the average age of vehicles on higher income lines. Vehicle assignment for low-income and higher income lines is shown in Table IV-11.

**Table IV-14: Vehicle Assignment**  
Average Age of Vehicles Assigned by Mode  
Spring 2022 Service

Mode of Service	Avg. Age of Vehicles (Years)		Difference; Low Income to Higher Income +/-
	Low Income Lines	Higher Income Lines	
Bus	6.53	7.39	(.86)
MAX Light Rail	20.34	n/a	n/a
WES Com-muter Rail	Primary: 12.0 Spares: 66.5	n/a	n/a

## Findings

1. The average age of vehicles on low-income bus lines (6.53 years) is 12% less than the average age of vehicles on higher income bus lines (7.39 years)
  2. The MAX lines are considered low-income. The average age is 20.3 years.
- Thus, there are no Disproportionate Burden on low-income population in regard to vehicle assignment on bus, MAX, or WES.

## SUMMARY

As summarized in Table IV-12 and Table IV-13, TriMet finds no disparities in terms of performance standards that would indicate lesser service provision to minority or low-income populations. Across nearly every metric, minority/low-income lines actually performed better than non-minority/higher income lines, and minority/low-income populations have better access to the TriMet system based on Residential proximity to service.

Equity Metric: Distribution of Amenities Spring 2021				
Metric % of stops with amenity on minority vs. non-minority lines	<= 20% Difference	<=10% Difference	<=5% Difference	As good or better on minority lines
<i>Seating</i>	✓	✓	✓	✓
<i>Lighting</i>	✓	✓	✓	✗
<i>Elevators</i>	✓	✓	✓	✓
<i>Digital Displays</i>	✓	✓	✓	✓
<i>Shelters</i>	✓	✓	✓	✓
<i>Signs, Maps and/or Schedules</i>	✓	✓	✓	✗
<i>Waste Receptacles</i>	✓	✓	✓	✓

**Table IV-14: Evaluation and Findings – Service Standards and Policies**  
Comparison of Minority and Non-Minority Lines  
Spring 2021

Equity Metric: Service Standards Spring 2021												
Metric Minority and non-minority comparison by mode and for the system as a whole	<=20% Difference			<=10% Difference			<=5% Difference			As good or better on minority lines		
	B u s	M A X	S y s	B u s	M A X	S y s	B u s	M A X	S y s	B u s	M A X	S y s
<b>Vehicle Loads</b> If the average load of minority lines is above the maximum load factor, comparison to average load of non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Service Frequency &amp; Span</b> Revenue hours of service provided on minority vs. non-minority lines.	✓	✓	✓	✗	✓	✓	✗	✓	✓	✗	✓	✗
<b>On-Time Performance</b> Average percent on-time for minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗

<b>Vehicle Assignment</b> Average age of vehicles serving minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Service Availability</b> Percentage of minority vs. non-minority population within ½ mile of service.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

*WES (a minority line) is the only commuter rail line, so it cannot be compared to other commuter rail lines. It is included as part of the overall system analysis.*

✓ = Performance meets metric at level indicated  
 ✗ = Performance does not meet level indicated



**Table IV-15: Evaluation and Findings – Service Standards and Policies**  
 Comparison of Low-Income and Higher Income Lines  
 Spring 2021

Equity Metric: Distribution of Amenities Spring 2021				
Metric	<= 20% Difference	<=10% Difference	<=5% Difference	As good or better on low-income lines
Seating	✓	✓	✓	✓
Lighting	✓	✓	✓	✓
Elevators	✓	✓	✓	✓
Digital Displays	✓	✓	✓	✓
Shelters	✓	✓	✓	✓
Signs, Maps and/or Schedules	✓	✓	✓	✗
Waste Receptacles	✓	✓	✓	✓

Equity Metric: Service Standards Spring 2021												
Metric	<=20% Difference			<=10% Difference			<=5% Difference			As good or better		
	B u s	M A X	S y s	B u s	M A X	S y s	B u s	M A X	S y s	B u s	M A X	S y s
Low-income and non-low-income comparison by mode and for the system as a whole												
<b>Vehicle Loads</b> If the average load of low-income lines is above the maximum load factor, comparison to average load of non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Service Frequency &amp; Span</b> Revenue hours of service provided on low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>On-Time Performance</b> Average percent on-time for low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗
<b>Vehicle Assignment</b> Average age of vehicles serving low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Service Availability</b> Percentage of low-income vs. non-low-income population within ½ mile of service.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

WES (a low-income line) is the only commuter rail line, so it cannot be compared to other commuter rail lines. It is included as part of the overall system analysis. All MAX lines are low-income lines.

✓ = Performance meets metric at level indicated  
 ✗ = Performance does not meet level indicated

# Part V: Demographic Analysis

TriMet uses demographic data to assess equity in distribution of services, facilities, and amenities in relation to minority, low-income, and limited English proficient populations. Such data informs TriMet in the early stages of service, facilities, and programs planning and enables TriMet to monitor ongoing service performance, analyze the impacts of policies and programs on these populations and take appropriate measures to avoid or mitigate potential disparities. TriMet develops GIS maps and comparative charts to perform this analysis, relying on both ridership and population data within the service area.

The demographic data shown in this report is from the following sources:

- 2016-2020 American Community Survey (ACS)
- 2018 TriMet On-board Fare Survey

## CURRENT SERVICE AND SERVICE AREA

The maps shown in Figures V-1 to V-4 display the distribution of minority, low-income, and LEP populations in relation to services throughout the TriMet service area

Service and Service Area in Figure V-1 shows all TriMet bus and rail lines, differentiated by Frequent Service lines and Standard or Rush Hour-only service lines.

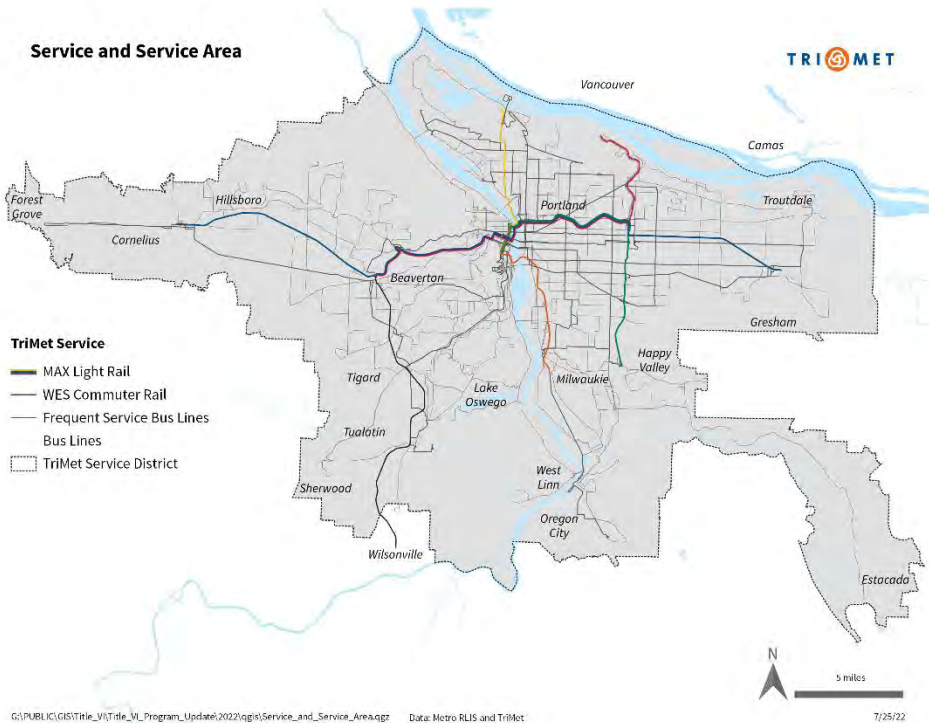
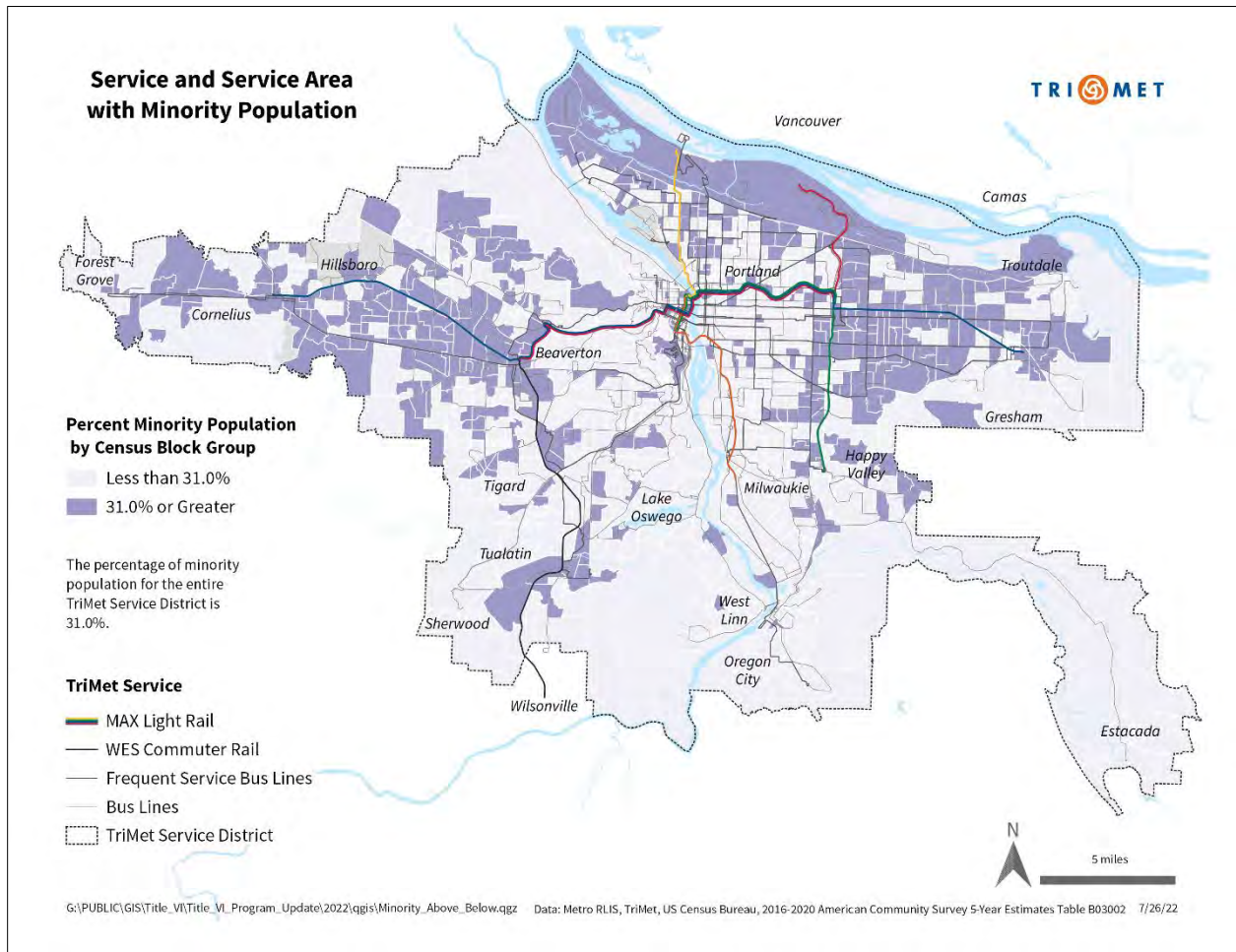


FIGURE V-1: SERVICE AND SERVICE AREA

Service Area with **Minority Population** in Figure V-2 depicts the TriMet network in relation to minority population by Census block group. Areas are shaded corresponding to block groups, which had a minority population greater than or equal to the average for the TriMet District (31.0 percent) as of the 2016-2020 ACS. This is an increase from 29.2% indicated in the 2013-2017 ACS.

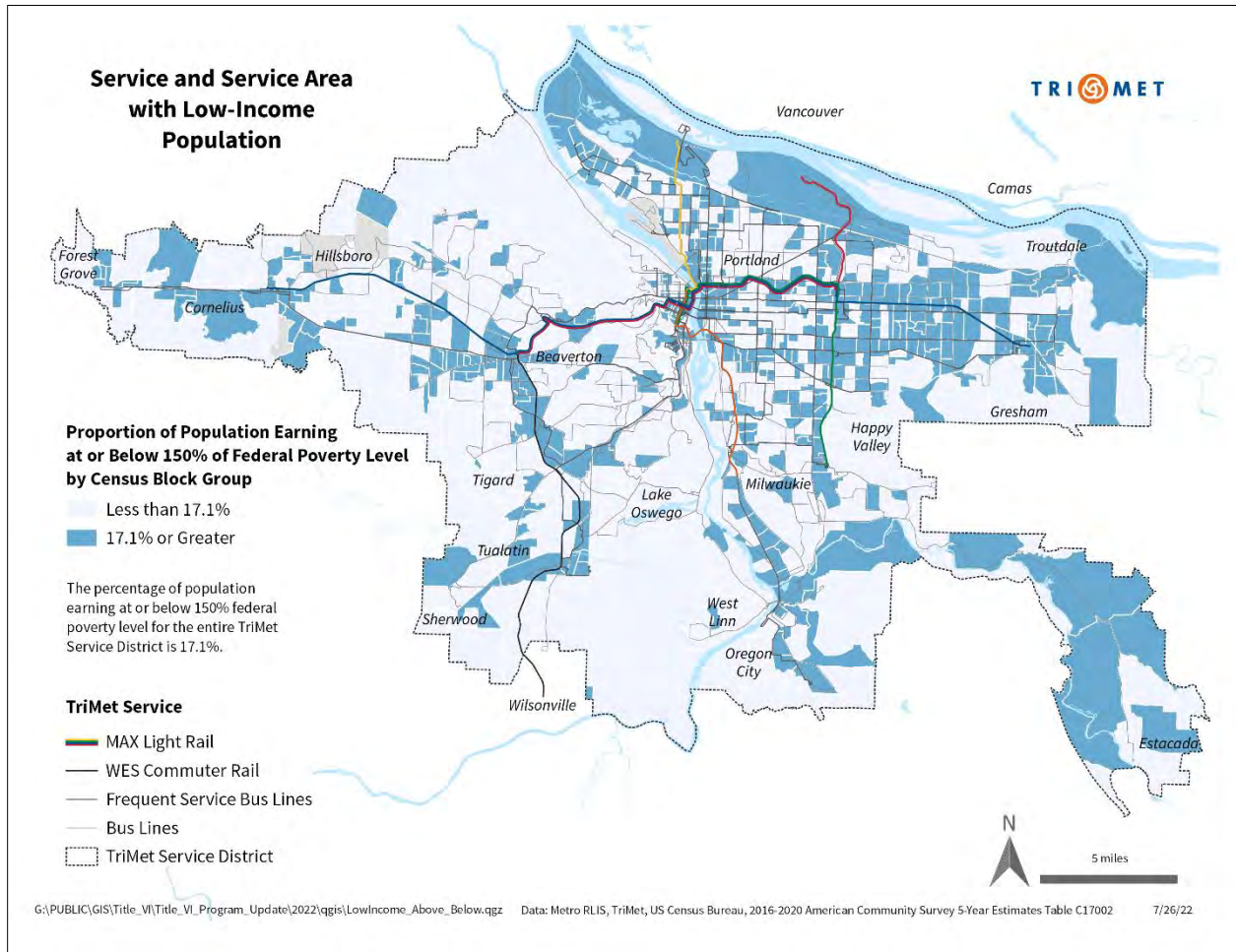
Patterns are largely similar to TriMet’s 2019 Title VI Program submittal: most areas with higher concentration of minority populations are distributed across the western, eastern, and northern parts of the service area. A few block groups in the southwest areas of the TriMet district now have above-average minority populations, whereas in 2019 they were below average (near Tigard and Tualatin, for example).



**FIGURE V-2: SERVICE AND SERVICE AREA WITH MINORITY POPULATION**



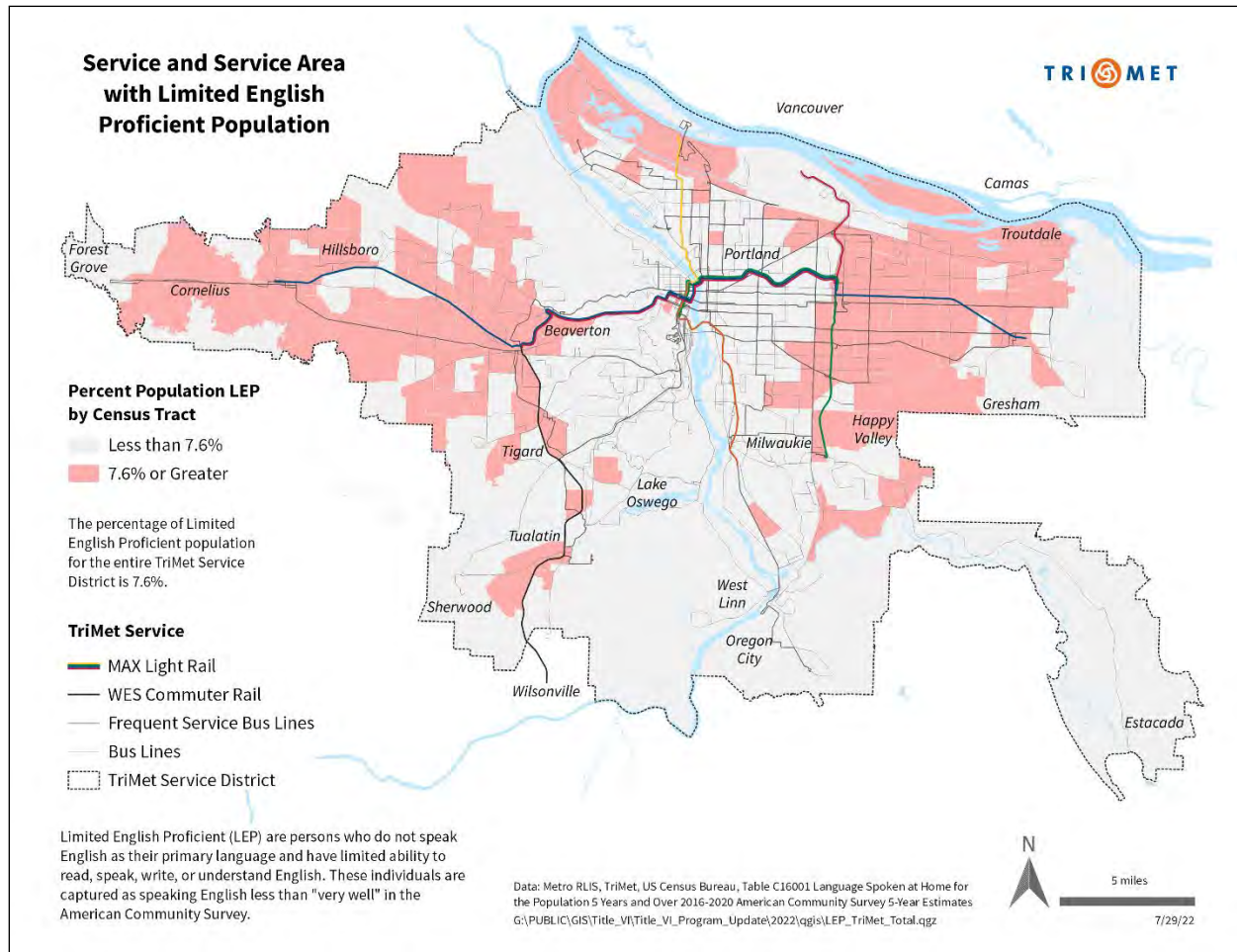
Service and Service Area with **Low-Income Population** in Figure V-3 depicts the TriMet network in relation to low-income population by Census block group. Low-income is defined as earning equal to or less than 150 percent of the Federal Poverty Level. Areas are shaded corresponding to block groups, which had low-income populations greater than or equal to the average for the TriMet District (17.1 percent) as of the 2016-2020 ACS. This is a decrease from 20.7% indicated in the 2016-2017 ACS. There are high concentrations of low-income households found throughout the service area.



**FIGURE V-3: SERVICE AND SERVICE AREA WITH LOW-INCOME POPULATION**

**Limited English Proficient (LEP) Population Distribution** in Figure V-4 depicts the TriMet network in relation to LEP population by census tract, as language information is not available at a smaller geographic scale. Limited English Proficiency is defined as persons who report speaking English less than “very well” in the ACS. Areas are shaded corresponding to census tracts which had a LEP population greater than or equal to the average for the TriMet District (7.6 percent) as of the 2016-

2020 ACS. Similar to the map of minority population, most above-average LEP census tracts are located in the western, eastern, and northern parts of the service area.



**FIGURE V-4: SERVICE AND SERVICE AREA WITH LIMITED ENGLISH PROFICIENT DISTRIBUTION**

## PROXIMITY TO SERVICE

TriMet performed a demographic analysis of proximity to TriMet Service. The information in Table V-1 on the next page shows population counts and percentages of those within one-half mile of service by race/ethnicity and low-income. This is also delineated by type of service, i.e. bus, MAX and WES; and Frequent Service bus and MAX.

Of note, a greater percentage of minorities and low-income populations are located within one-half mile of all forms of service than the population as a whole. Relative to other racial/ethnic groups, the black non-Hispanic population has the highest percentage of minority persons within half mile of bus and MAX service. For the WES commuter rail line, the Hispanic population makes up the largest share of minority population served.



**TABLE V-1: DEMOGRAPHIC ANALYSIS OF PROXIMITY TO TRIMET SERVICE**

Demographic Analysis of Proximity to TriMet Service (percent)		TM District		Percent within 1/2* Mile of...			Frequent Service	
		Totals (raw number)	Totals (pct.)	Bus	MAX	WES	Bus	Bus & MAX
<b>Population</b>	Total (ACS 5 year estimate, 2016-2020)	1,647,046	100.0%	88.1%	16.4%	0.9%	51.5%	67.9%
<b>Minority</b>	All Minorities	511,388	31.0%	89.9%	19.4%	1.2%	55.0%	74.4%
	Black (non-Hispanic)	57,430	3.5%	94.2%	23.4%	0.8%	71.0%	94.3%
	Hispanic	214,941	13.1%	91.8%	19.7%	1.8%	59.9%	79.5%
	Asian (non-Hispanic)	139,846	8.5%	86.1%	18.5%	0.4%	41.7%	60.2%
	Native American (non-Hispanic)	8,085	0.5%	89.0%	22.4%	0.7%	61.2%	83.5%
	Hawaiian Native and Pacific Islander (non-Hispanic)	7,549	0.5%	92.8%	28.7%	2.6%	63.8%	92.6%
	Other (Including Mixed Race, non-Hispanic)	83,537	5.1%	88.1%	16.1%	1.1%	52.4%	68.5%
<b>Non-Minority</b>	White (non-Hispanic)	1,135,659	69.0%	87.4%	15.1%	0.7%	49.9%	65.1%
<b>Population</b>	Total population with known income (ACS 5 year estimate, 2016-2020)**	1,625,299	100.0%	88.1%	16.3%	0.9%	51.3%	67.7%
<b>Income</b>	Below 150% of Poverty Level	277,968	17.1%	93.1%	23.5%	1.3%	65.4%	88.8%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2016 - 2020 (5-Year Estimates)  
 Populations of block groups that are only partially within the TriMet district were adjusted using residential address points from the Oregon Metro Master Address File.

\* Distance calculations based on December 2021 stop and station locations.

\*\* Population totals for the TriMet district vary between statistics for race and income/poverty because the ACS total excludes those whom poverty status is not determined.

## RIDERSHIP CHARACTERISTICS AND DEMOGRAPHICS (TRIP BASED)

Due to the pandemic, TriMet has not been able to conduct an updated on site cross vehicle mode in person survey. Our goal is to conduct an updated in person rider survey in the spring of 2023. TriMet rider weekday trip characteristics and demographic data presented in Attachment O used the TriMet 2018 Fare Survey data to provide a snapshot of weekday trips<sup>6</sup> made by riders in terms of race/ethnicity, household income, and Limited English Proficiency (LEP).

Race/ethnicity and income are compared in the following pages and called out when significantly different at the 95% confidence level. The 2018 Fare Survey was a system wide on-board survey with a 10% sample of trips for bus and MAX, with a 50% sample for WES. Data is weighted to originating rides.

### TRIPS BY RACE/ETHNICITY 2018 FARE SURVEY

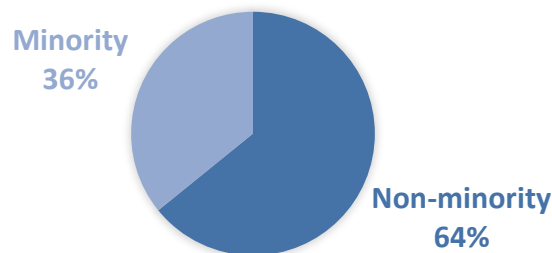


FIGURE V-5 TRIPS BY RACE/ETHNICITY

### TRIPS BY INCOME 2018 FARE SURVEY

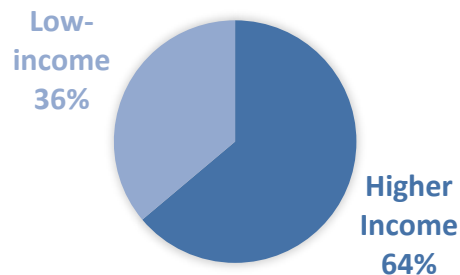


FIGURE V-6 TRIPS BY INCOME

<sup>6</sup> Data for weekend trips was also collected, but was not included in this submittal.

Trips are more likely to be made by non-minority and higher income riders (64%), consistent with the Portland metro population. When looking at the American Community Survey (ACS) demographic analysis in Table V-1, the TriMet Service district is 71% non-minority and 79% higher income. Note the ACS is a survey of people and includes all ages while the Fare Survey is a survey of trips and includes ages 12 or older.

Of those who took the Fare Survey in Spanish (entire survey available) or ten other languages (two questions available)<sup>7</sup>, few speak English very well (3%-6%), with the rest meeting the definition of limited English proficiency, or LEP. The most common languages selected by those who indicated they were not comfortable taking the survey in English were Russian, Vietnamese and Arabic.

### ABILITY TO SPEAK ENGLISH 2018 FARE SURVEY (NON-ENGLISH RESPONSES ONLY)

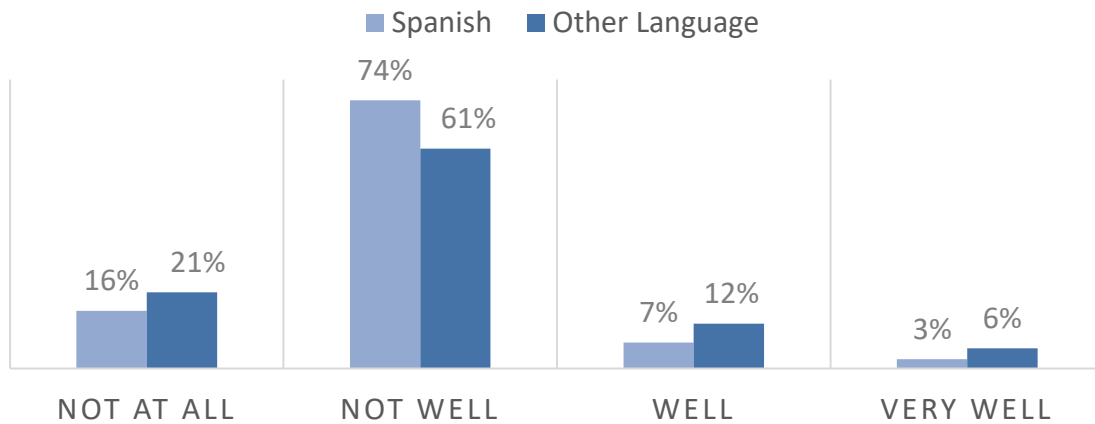


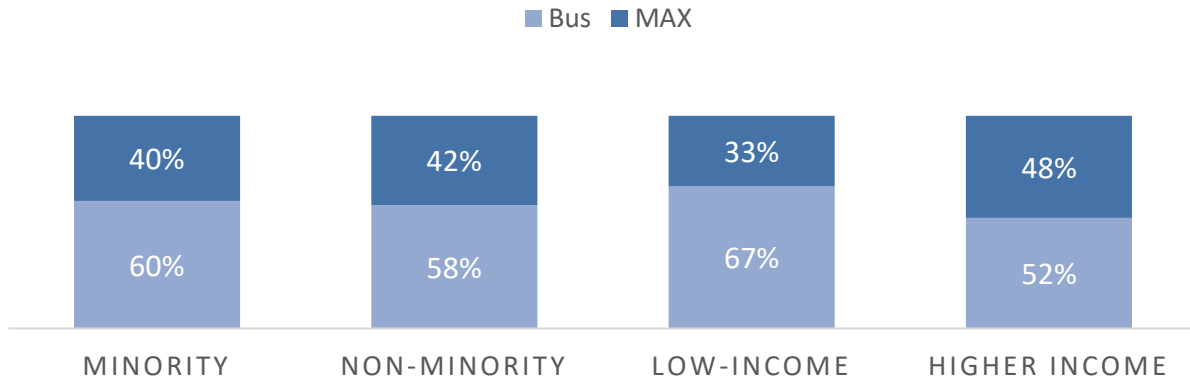
FIGURE V-7 ABILITY TO SPEAK ENGLISH

### Vehicle Modes Used (Bus, MAX, WES)

Across all groups, the majority of trips are made by TriMet bus. However, both minority and low-income riders take a higher proportion of trips on bus and smaller proportion of trips on MAX light rail than non-minority and higher income riders. WES commuter rail trips comprise less than 1% of trips for all groups.

<sup>7</sup> If riders indicated that they spoke neither English nor Spanish, they were asked to identify which language they spoke from a menu. They were then asked in their selected language how well they spoke English.

## VEHICLE MODES USED 2018 FARE SURVEY

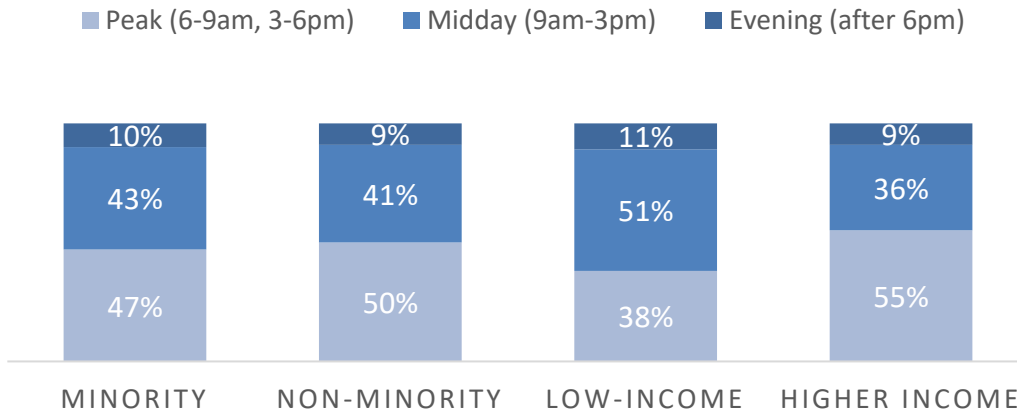


**FIGURE V-8: VEHICLE MODES USED BY RACE/ETHNICITY AND INCOME**

### Ridership by Time of Day

Time of day comparisons show a greater proportion of trips made midday by low-income riders (51%) compared to higher-income riders (36%). Trips made by non-minority riders were more likely to include an AM peak trip when compared to trips made by minority riders.

## RIDERSHIP BY TIME OF DAY 2018 FARE SURVEY



**FIGURE V-9: RIDERSHIP BY TIME OF DAY BY RACE/ETHNICITY AND INCOME**

## Transfers

Most trips on TriMet did not involve a transfer. In other words, the majority of riders enjoyed a one-seat ride to complete their one-way trips. However, 31% of trips taken by low-income riders included a transfer - higher than the 22% of trips made by higher income riders. Trips made by minority riders were more likely to include a transfer than trips taken by non-minority riders (28% and 25%, respectively).

### DOES YOUR TRIP REQUIRE A TRANSFER? 2018 FARE SURVEY

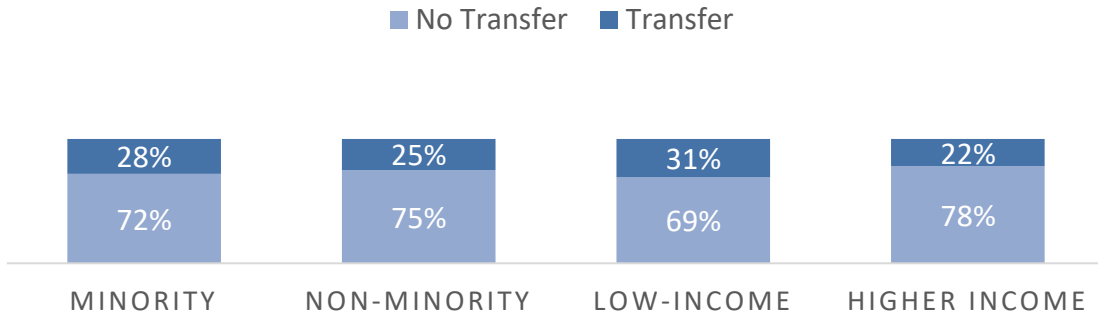


FIGURE V-10: TRANSFER ACTIVITY BY RACE/ETHNICITY AND INCOME

## Frequency of Riding TriMet

The average number of times respondents rode TriMet in the last week was higher for trips made by minorities and low-income riders. When grouped into categories of frequent/regular riders in Figure V-11, 90% of minority and 91% of low-income rode several times a week or more compared to 88% of non-minority and higher-income.

### HOW OFTEN DO YOU RIDE TRIMET? 2018 FARE SURVEY

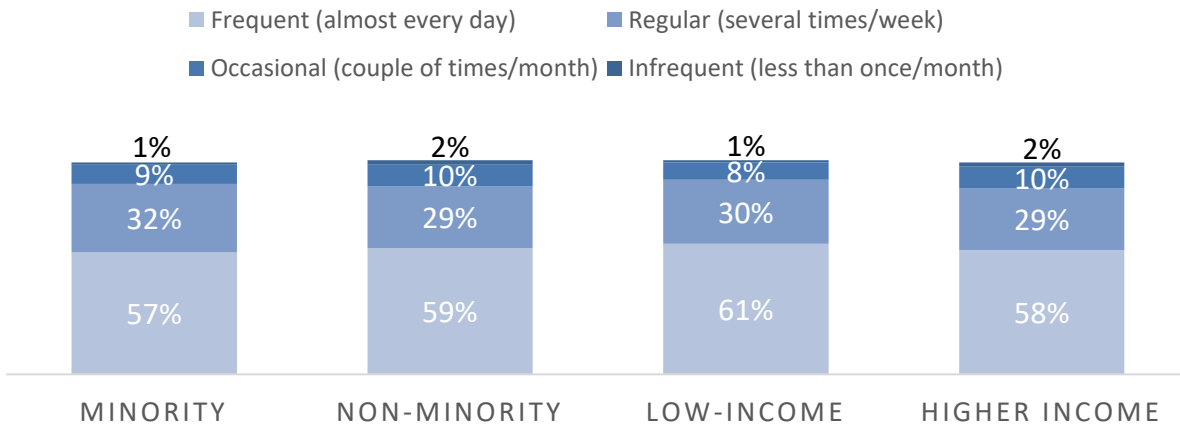


FIGURE V-11: FREQUENCY OF RIDING TRIMET BY RACE/ETHNICITY AND INCOME



### Transit-Dependency

In order to explore transportation options available to TriMet riders, respondents were asked if they had a driver's license. Less than half of minority rider and low-income rider responses indicated they did not have a current driver's license. This was lower than non-minority (66%) and higher income (78%) rider responses.

### DO YOU HAVE A CURRENT DRIVER'S LICENSE? 2018 FARE SURVEY

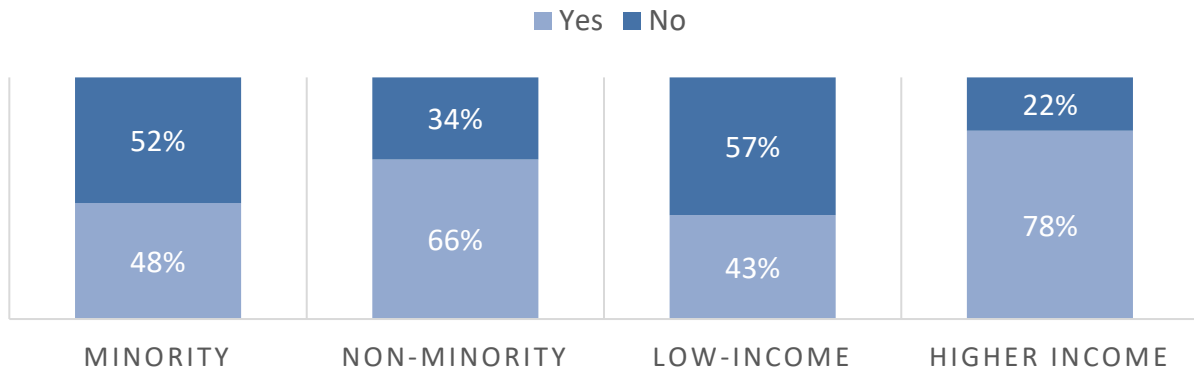
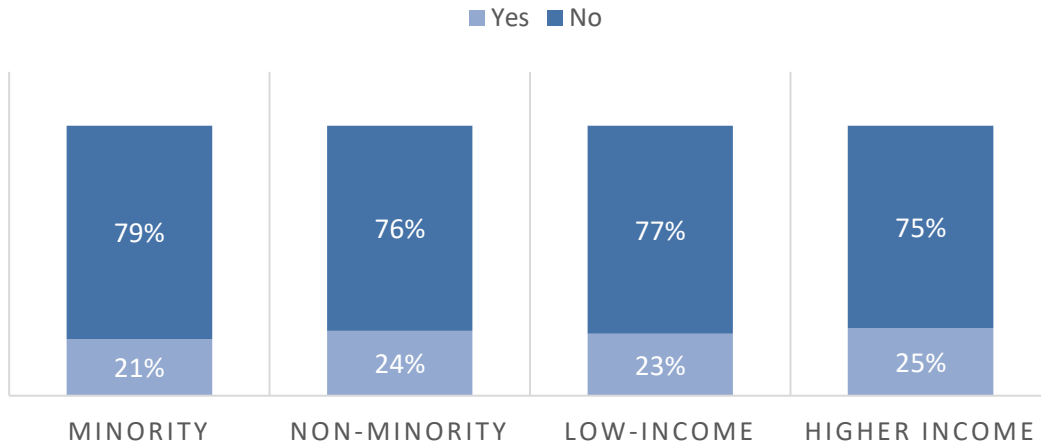


FIGURE V-12: CURRENT DRIVER'S LICENSE BY RACE/ETHNICITY AND INCOME

### Fare Payment

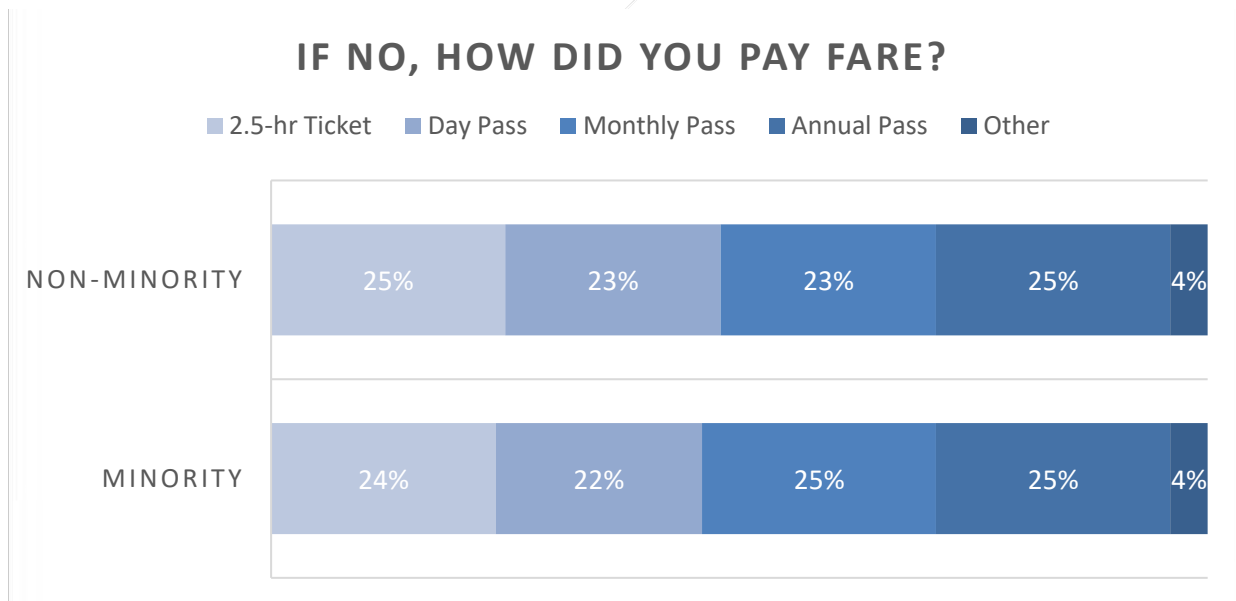
In July of 2017, TriMet introduced a new electronic fare system called Hop Fastpass™. To assess rider payment method, a new question was added to the survey instrument asking: "Did you pay for this trip by using Hop?"

## PAY FOR TRIP USING HOP? 2018 FARE SURVEY



**FIGURE V-13: E-FARE PAYMENT TYPE BY RACE/ETHNICITY AND INCOME**

If Hop was not used as their fare payment method, riders were asked how they paid. As indicated in Figure V-14, the payment of fares across all categories were similar between minority and non-minority riders.

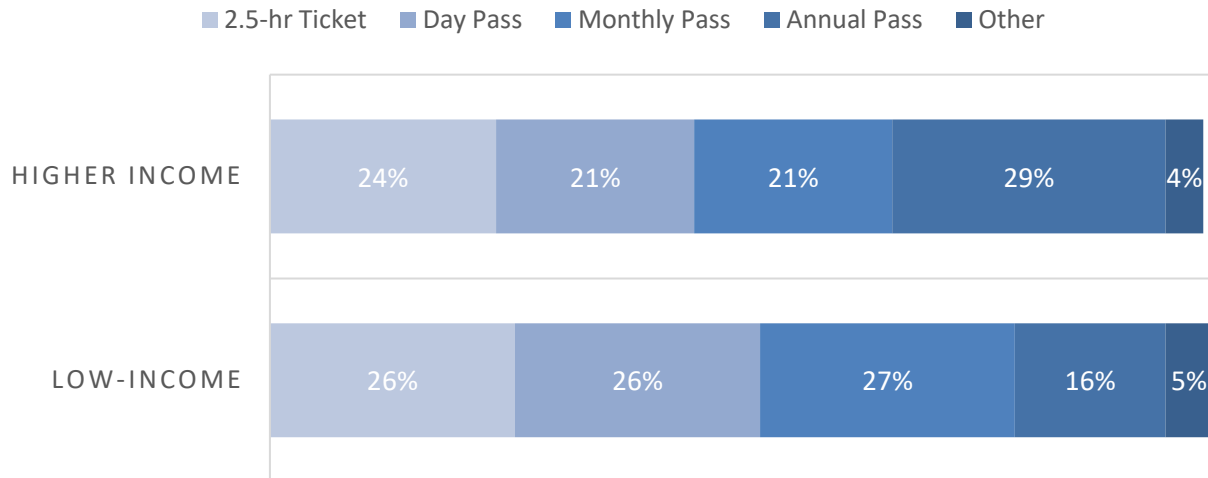


**FIGURE V-14: FARE PAYMENT TYPE BY RACE/ETHNICITY**

Conversely, fare payment comparisons between low-income and higher income riders reveal several differences, as shown in Figure V-15. Compared to fares paid by higher income riders, low-income

fares are more likely to be paid using a monthly pass or a Day Pass. While higher income riders were more likely to pay using an annual pass, most of which are obtained through employers. Trips paid with 2.5-hour tickets are comparable between the groups.

## IF NO, HOW DID YOU PAY FARE?



**FIGURE V-15: FARE PAYMENT TYPE BY INCOME**

In addition to the differences noted above are the following findings about fare purchase locations:

### Minority vs. Non-Minority

1. Non-minority trips were more commonly paid for using the Mobile Ticket App.
2. Fares used by minority riders were more likely to be obtained on-board the vehicle or at school.

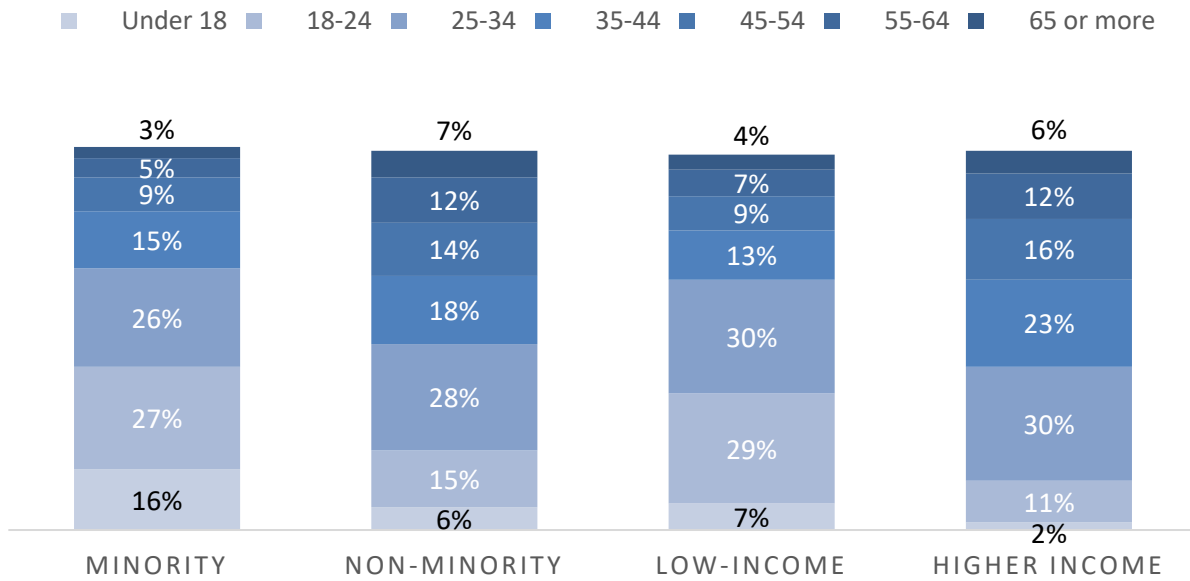
### Low-income vs. Higher Income

1. Higher income trips were more commonly paid for using the Mobile Ticket App.  
Fares used by low-income riders were more likely to be obtained on-board the vehicle, at school, at a retail store, or through a social service agency.

### Age

There were some differences between age groups. Low-income and minority trips were made by younger ages (less than 25) while higher income and non-minority trips were made by older ages (35 or more).

## AGE DISTRIBUTION 2018 FARE SURVEY



**FIGURE V-16: AGE DISTRIBUTION BY RACE/ETHNICITY AND INCOME**

### Future Surveys

TriMet’s intention for surveying passengers is to conduct the Fare Survey every two years. This on-board survey will consist of an approximate 10% sample of trips on all vehicle types. The survey will be translated in full into Spanish since that is by far the foreign language spoken most often in the TriMet Service District. In addition, some LEP questions will be translated into other languages, as was done in 2018. Data collected will be similar to the 2018 Fare Survey, i.e., transfer rate, routes transferred to/from, ridership information, fare payment information and demographics.

The TriMet Attitude & Awareness telephone survey of people ages 16+ in the TriMet Service District is conducted every year or every two years as needed. Sample sizes will be large enough for a 95% confidence level with a margin of error of between +/- 2% to +/- 4%. The survey is conducted in English and Spanish with both riders and non-riders. Respondents rate TriMet’s service and performance, tell about their ridership behavior, give opinions on new projects, and provide demographic information. TriMet may move to an addressed-based surveying methodology due to complications of telephone surveying.

## FACILITIES

Six maps (Figures V-17, V-18, V-19, V-20, V-21, and V-22) are provided to illustrate determination of Title VI program compliance with respect to recent, in progress, and planned major transit facilities. These respective figures highlight transit facilities that:

1. Were recently<sup>8</sup> replaced, improved<sup>9</sup>, or ;
2. Have improvements that are in progress, or;
3. Where improvements are scheduled (planned projects; projects identified in planning documents for an update in the next five years).

Figures V-17 through V-22 show Recent, In Progress, and Planned Facilities organized by facility type. The improvements shown include the following:

### Recently Completed

- Three storage and maintenance facility improvements
- Four battery electric buses
- One high capacity bus corridor
- Three MAX light rail station improvements
- 36 major bus stop improvements
- Two elevator refurbishments
- 240 Digital Display Additions

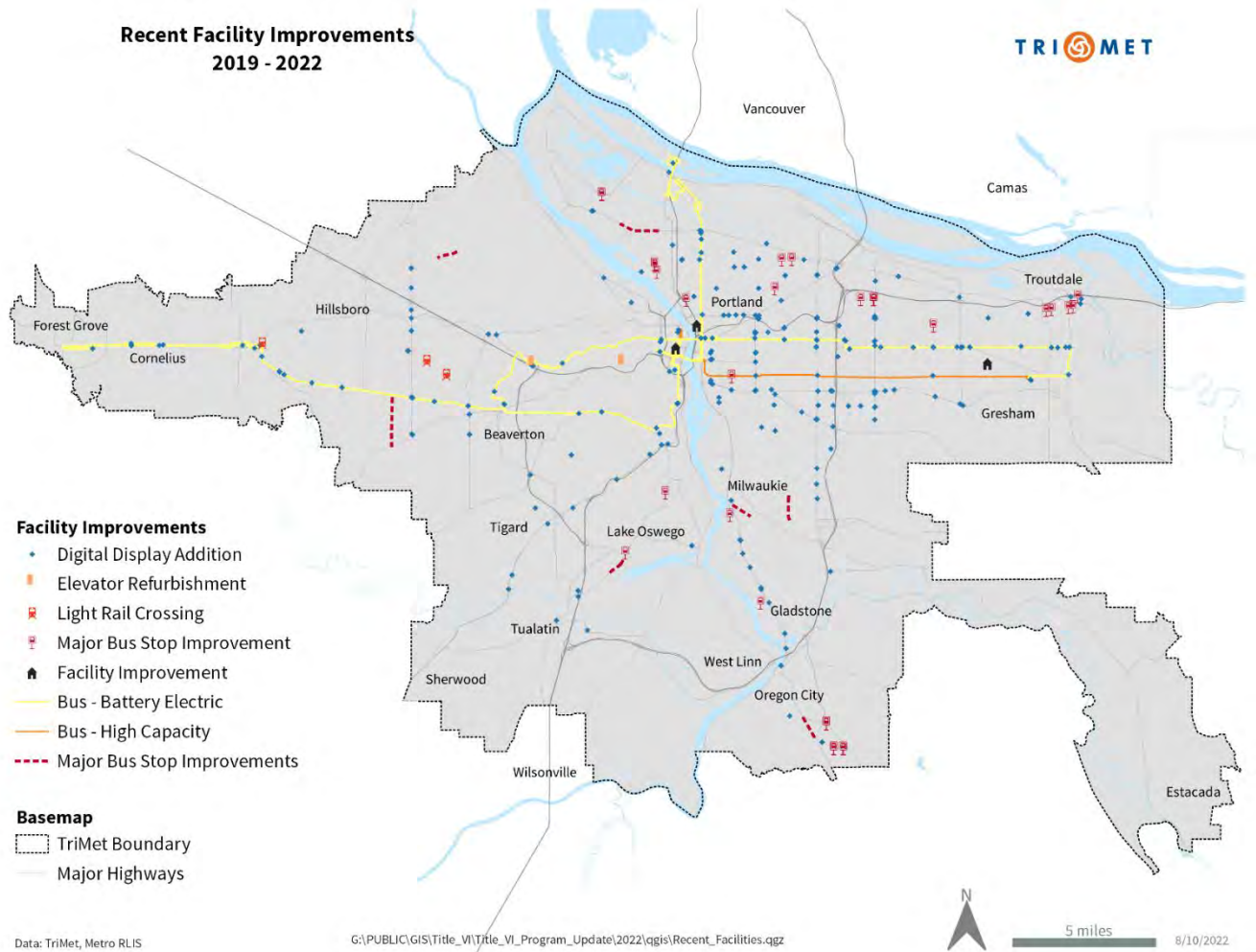
### In Progress and Planned

- One Park & Ride improvement
- Four storage and maintenance facility improvements
- Four transit center improvements
- Two new high capacity bus corridors
- One new high capacity and electric bus corridor
- Six MAX light rail corridor/station improvements
- 20 major bus stop improvements

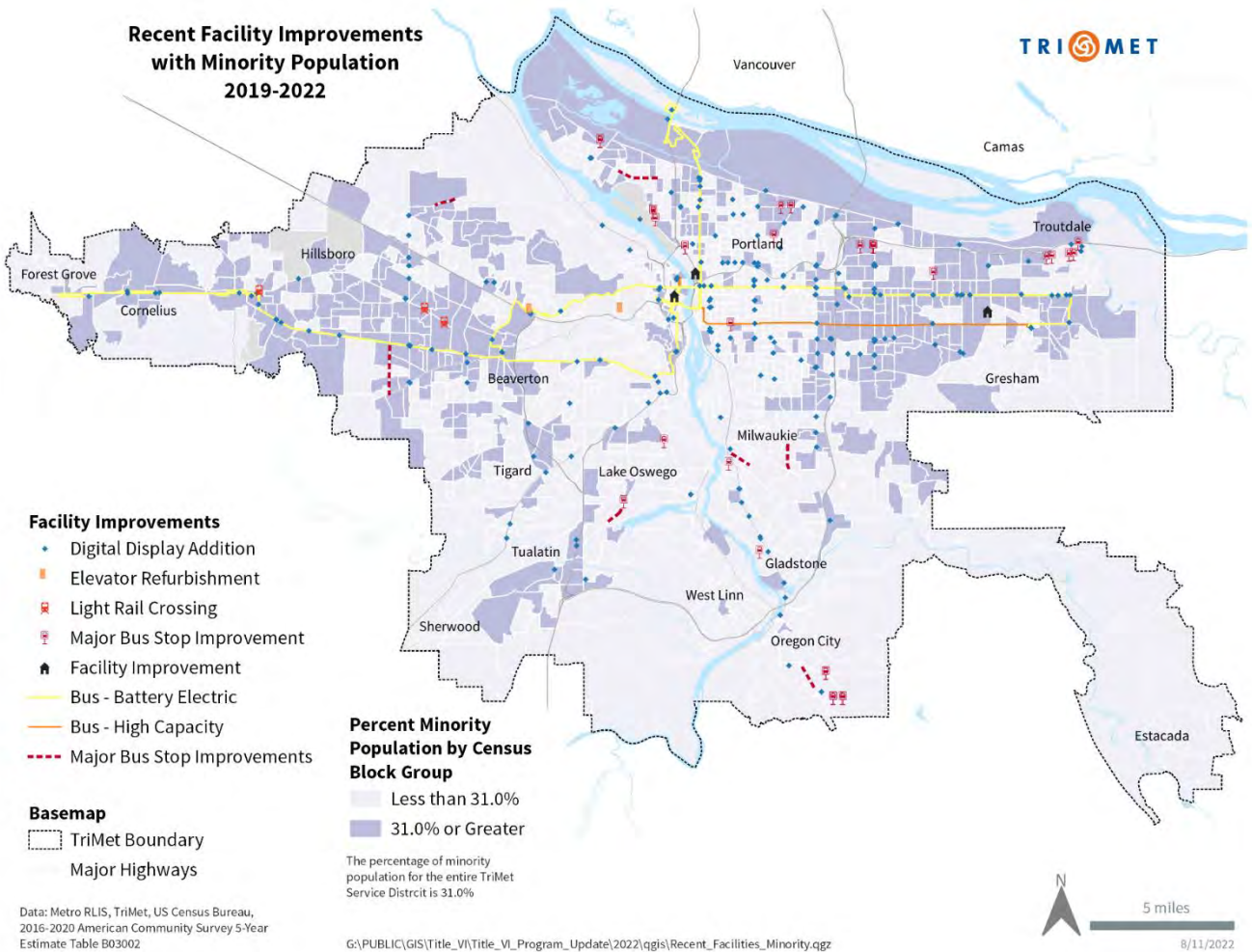
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<sup>8</sup> Recently means since the prior Title VI program submittal in 2019

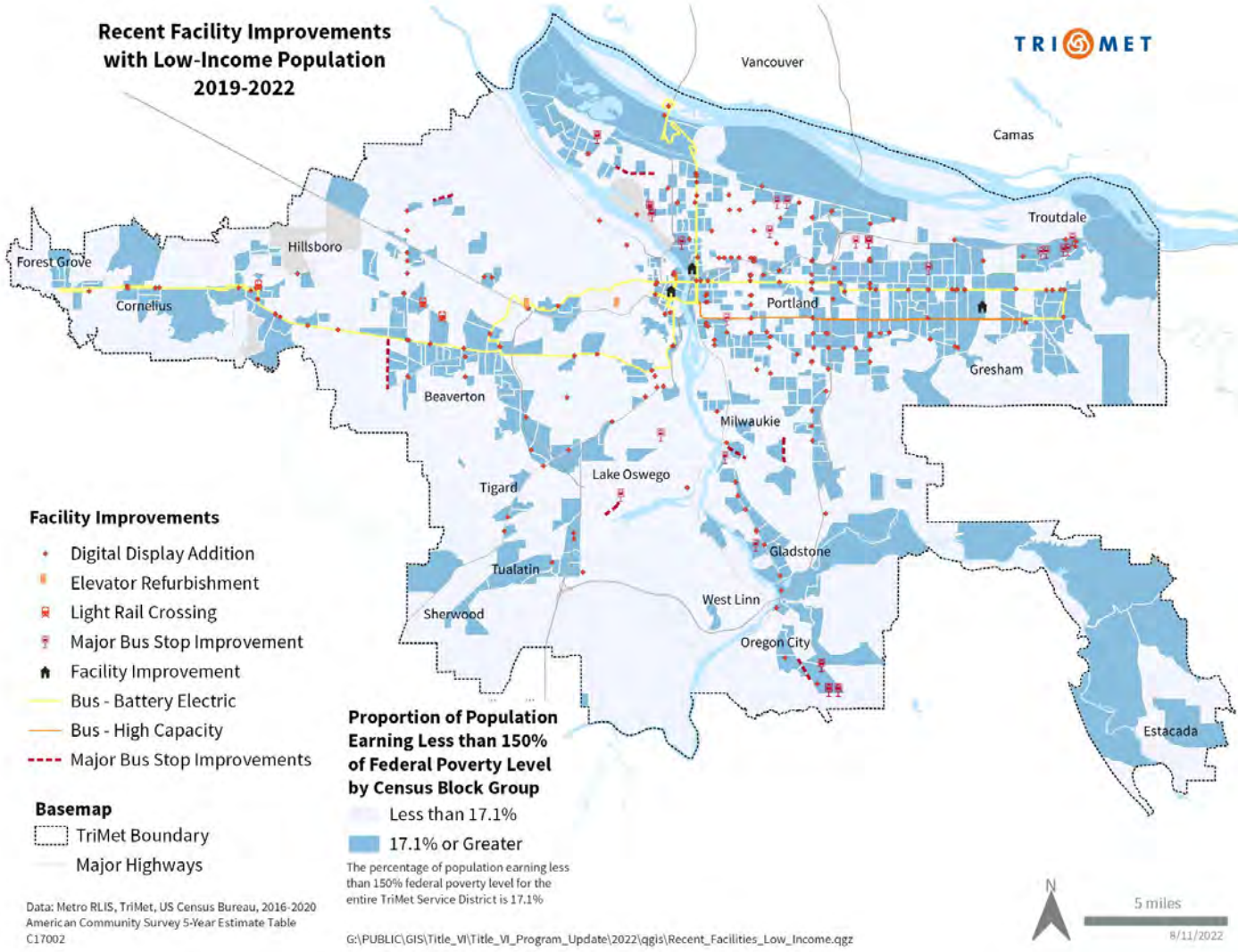
<sup>9</sup> Replacement and improvement excludes maintenance activities.



**FIGURE V-17: RECENT FACILITY IMPROVEMENTS**

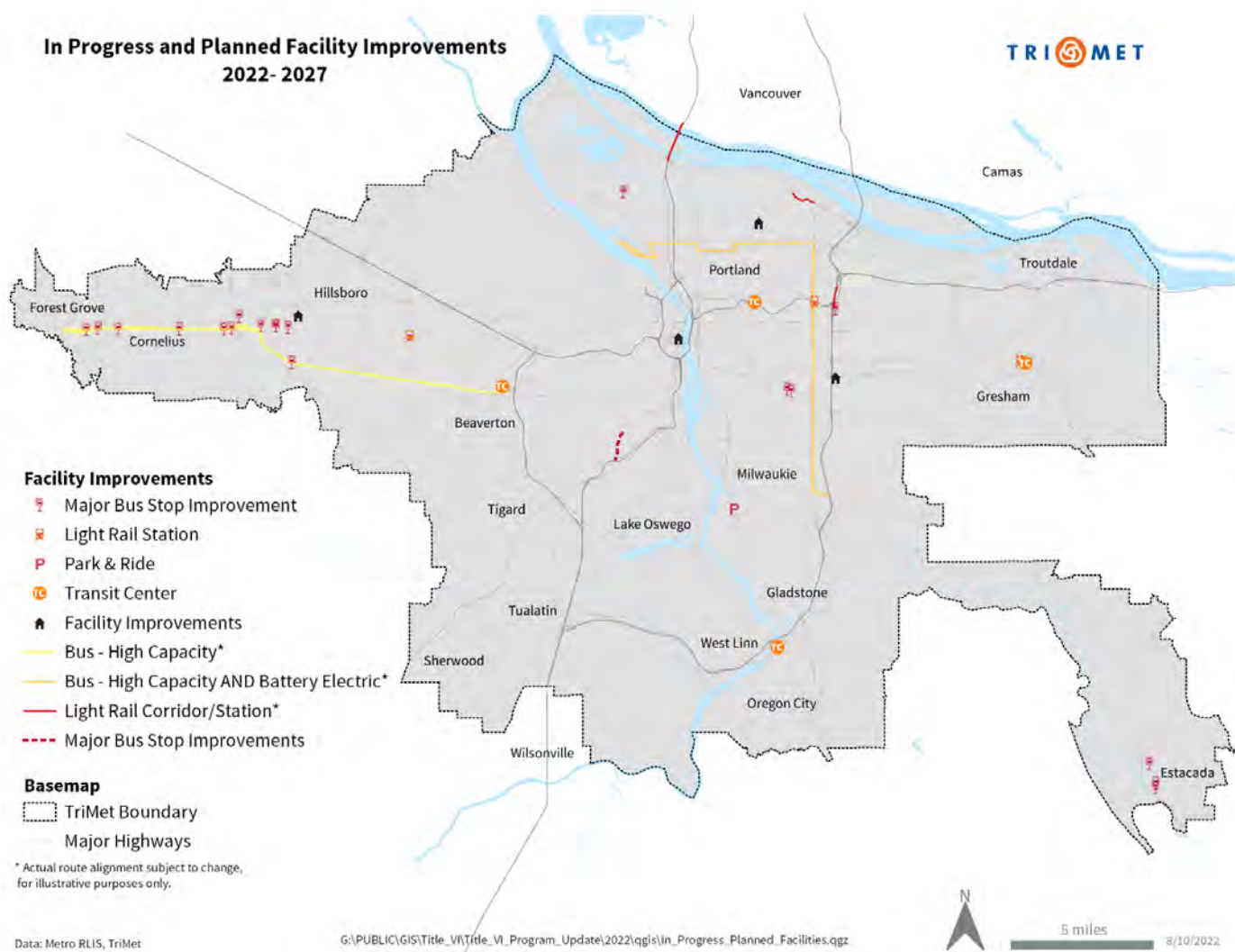


**FIGURE V-18: RECENT FACILITY IMPROVEMENTS WITH MINORITY POPULATION**

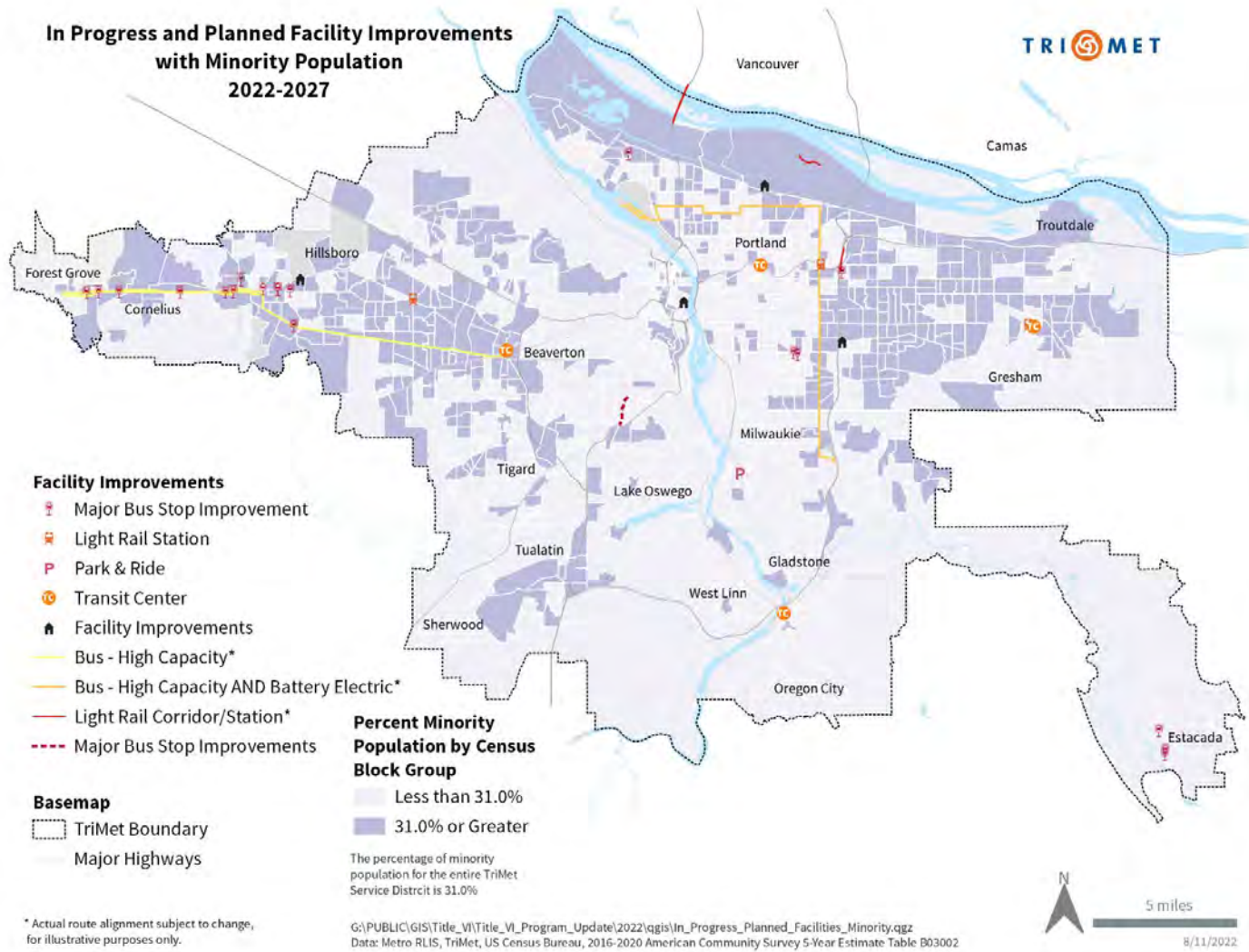


**FIGURE V-19: RECENT FACILITY IMPROVEMENTS WITH LOW-INCOME POPULATION**



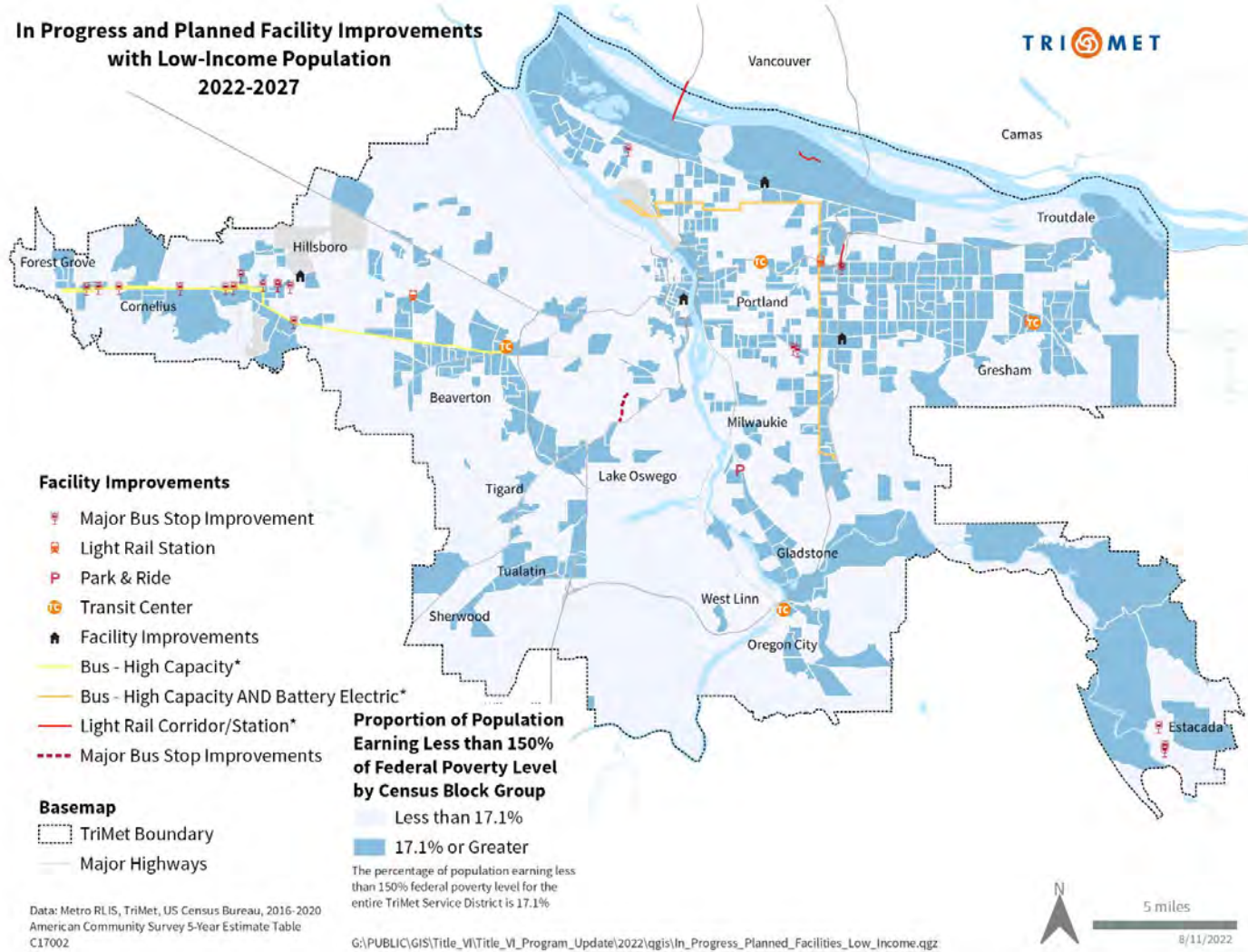


**FIGURE V-20: IN PROGRESS AND PLANNED FACILITY IMPROVEMENTS**



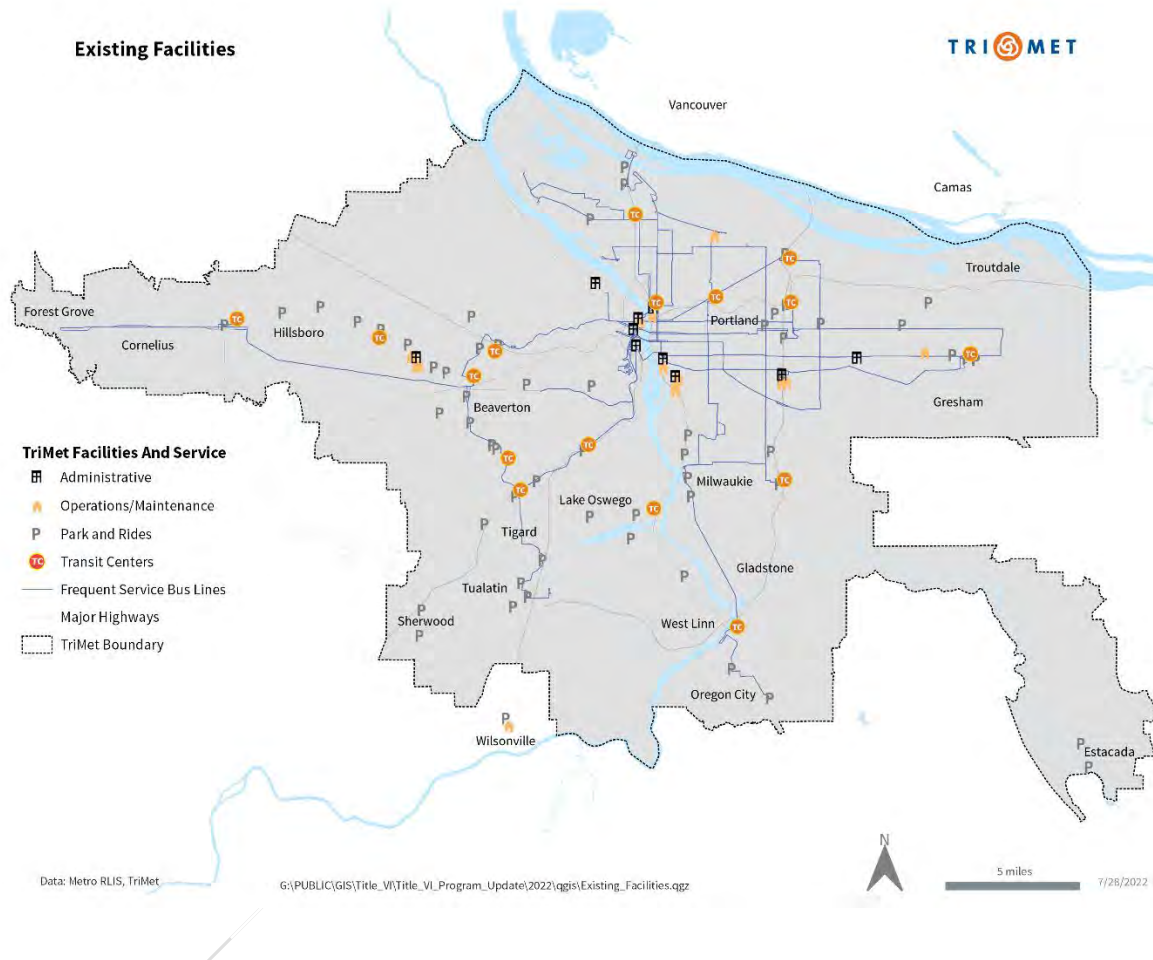
**FIGURE V-21: IN PROGRESS AND PLANNED FACILITY IMPROVEMENTS WITH MINORITY POPULATION**

**In Progress and Planned Facility Improvements  
with Low-Income Population  
2022-2027**



**FIGURE V-22: IN PROGRESS AND PLANNED FACILITY IMPROVEMENTS WITH LOW-INCOME POPULATION**

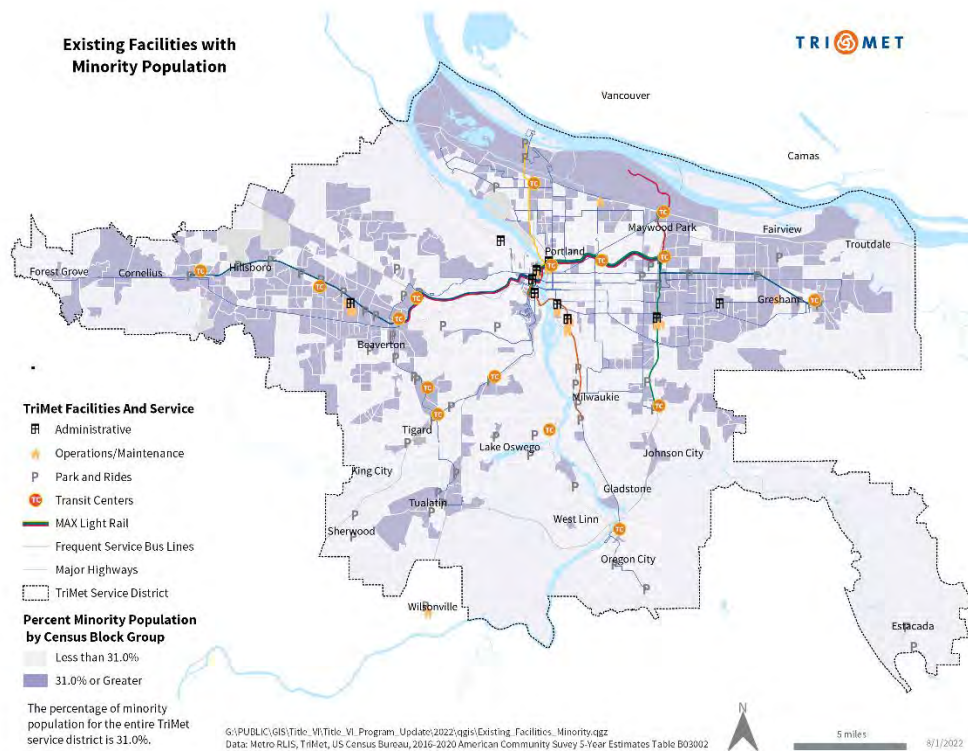
Figure V-23 shows the location of **Existing Facilities** in relation to Frequent Service lines (all five MAX light rail lines and 17 Frequent Service bus lines). Facilities are depicted by type: Administrative, operations/maintenance, Park & Ride, and transit centers.



**FIGURE V-23: EXISTING FACILITIES**

Figure V-24 **Existing Facilities with Minority Population** shows the location of existing facilities and Frequent Service transit lines in relation to Census block groups with above average concentration of minority population (31.0 percent or greater). Facilities are depicted by type: administrative, operations/maintenance, Park & Ride, and transit centers.

Administrative facilities are located in the center of the service district whereas bus and rail operations/maintenance facilities are distributed in central, Westside and Eastside locations.

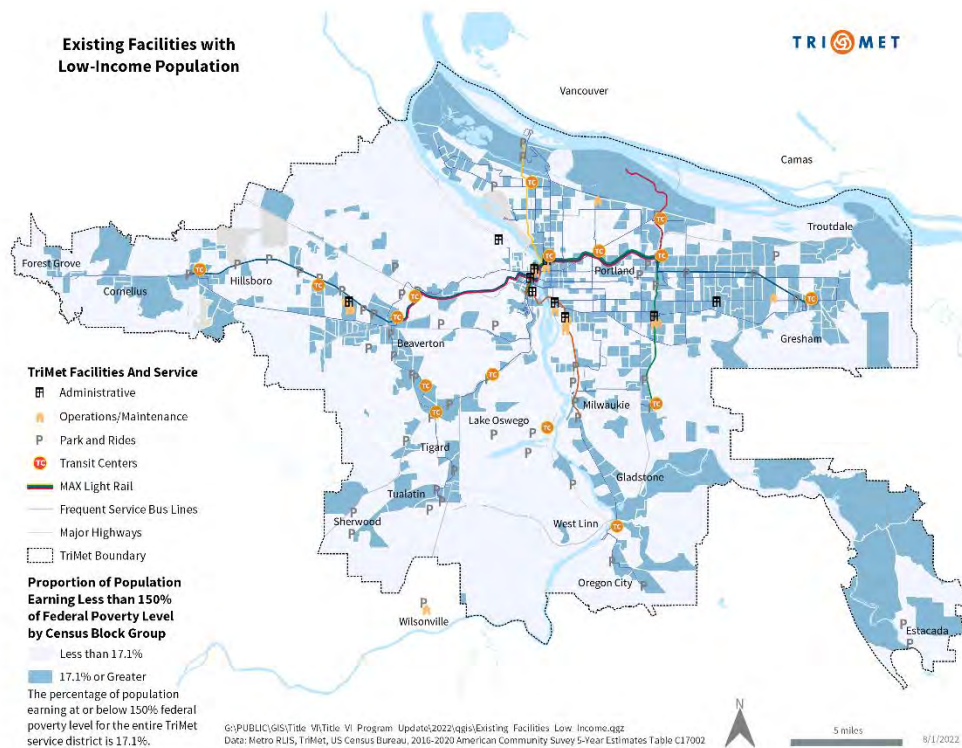


Transit Centers are dispersed throughout the service area and Park & Ride facilities are dispersed along major rail and bus service corridors and are typically five miles or more from the Portland City Center.

**FIGURE V-24: EXISTING FACILITIES WITH MINORITY POPULATION**

Figure V-25 **Existing Facilities with Low-Income Population** shows the location of existing facilities and Frequent Service transit lines in relation to Census block groups with above average concentration of low-income population (17.1% or greater). Facilities are depicted by type: administrative, operations/maintenance, park & ride, and transit centers.

Administrative facilities are located in the center of the service district whereas bus and rail operations/maintenance facilities are distributed in central, Westside, and Eastside locations.



Transit Centers are dispersed throughout the service area and park & ride facilities are dispersed along major rail and bus service corridors and are typically five miles or more from the Portland City Center.

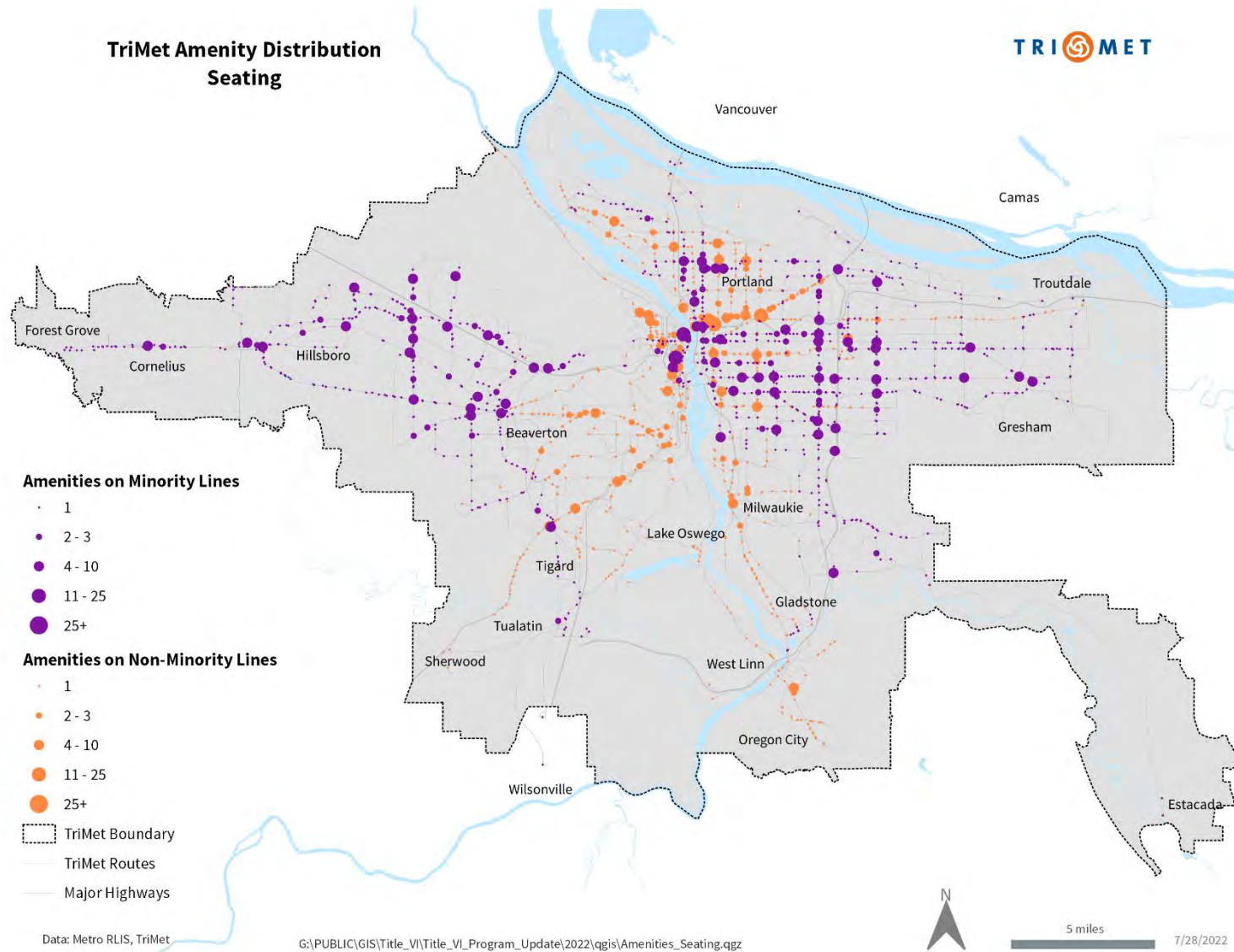
**FIGURE V-25: EXISTING FACILITIES WITH LOW-INCOME POPULATION**

## AMENITIES

Maps of amenities by type and location on minority and on non-minority transit lines that follow illustrate the distribution of amenities overlaid on Census block groups with above-average concentration of minority population:

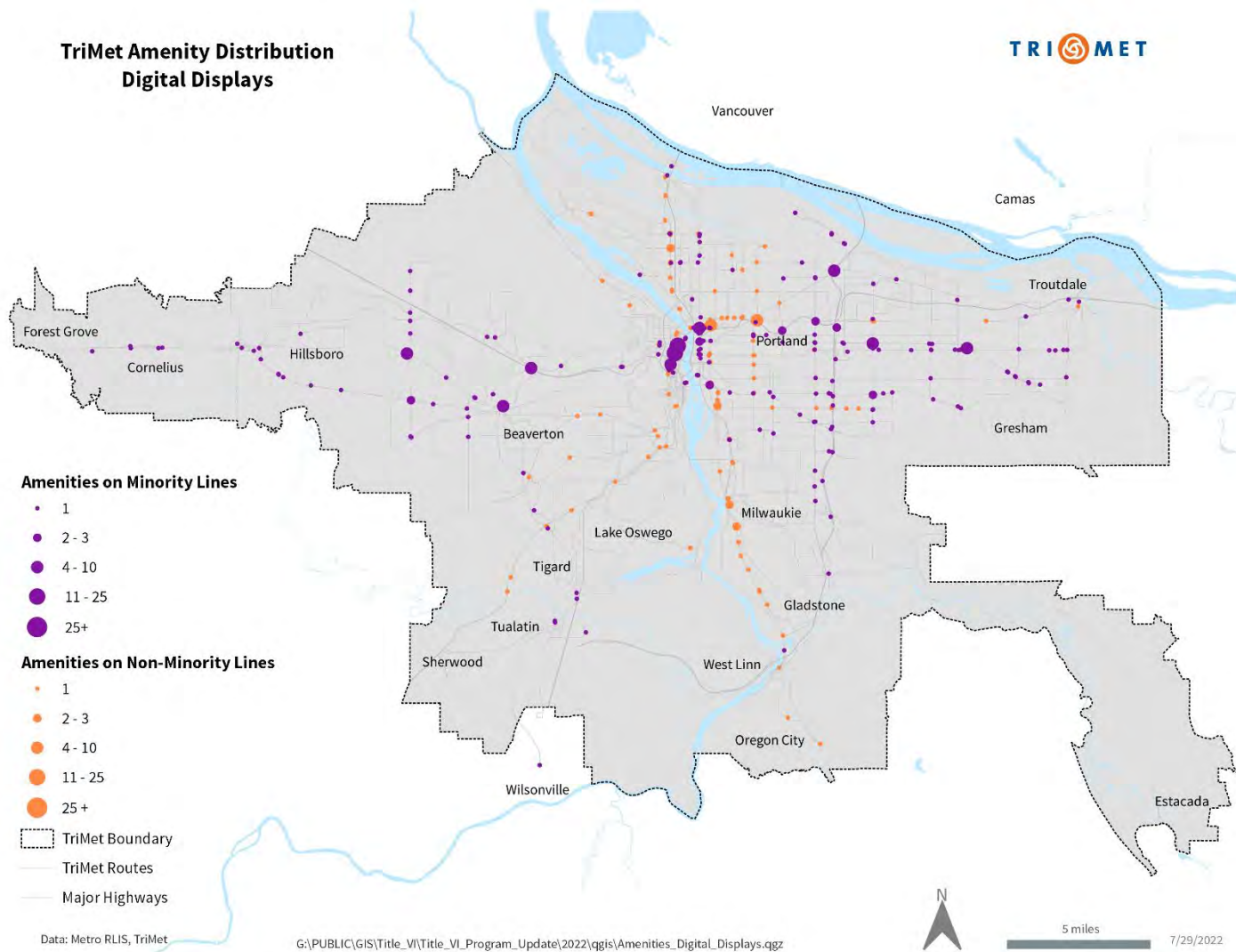
- Figure V-26 Amenity Distribution: Seating
- Figure V-27 Amenity Distribution: Digital Displays
- Figure V-28 Amenity Distribution: Elevators
- Figure V-29 Amenity Distribution: Shelters
- Figure V-30 Amenity Distribution: Signs, Maps, and/or Schedules
- Figure V-31 Amenity Distribution: Waste Receptacles

Due to the scale of the maps presented below, the large number of amenities, and many items' proximity to each other, these features were aggregated for display. To improve the interpretability of features, groups of like-amenities within 750 feet of each other were aggregated and the center of each cluster of points was used as the spatial location representing that group, and the number of individual points that made up each aggregation was added as an attribute of the new central point. In this process, minority amenities were aggregated only with other minority features and likewise with the non-minority group. This technique limited overlap between features while still preserving the majority of their location/spatial relationships to each other. Part IV-Service Monitoring includes a detailed location-based analysis of amenities placement and distribution in relation to minority and non-minority lines as well as low-income and higher income lines.

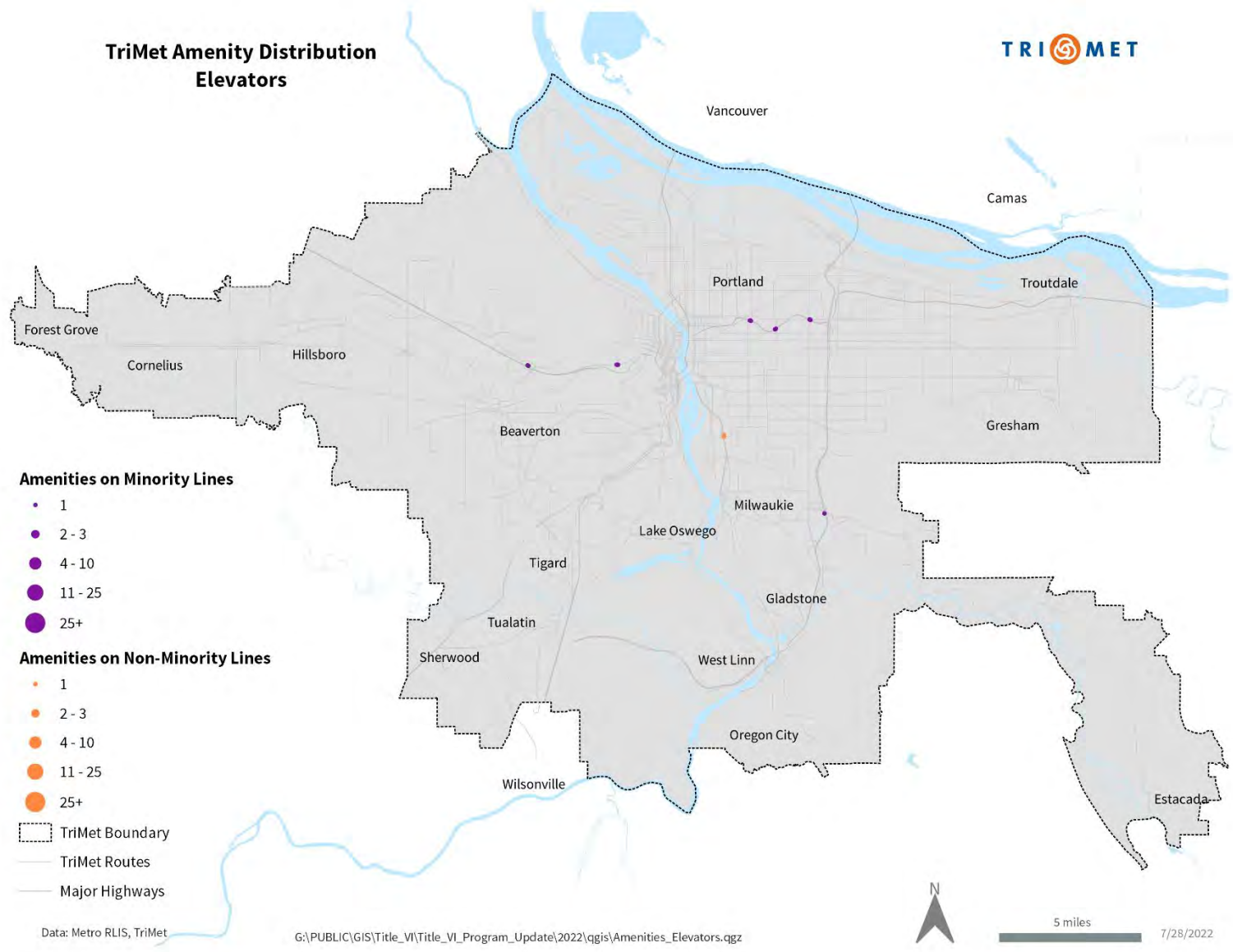


**FIGURE V-26 AMENITY DISTRIBUTION: SEATING**

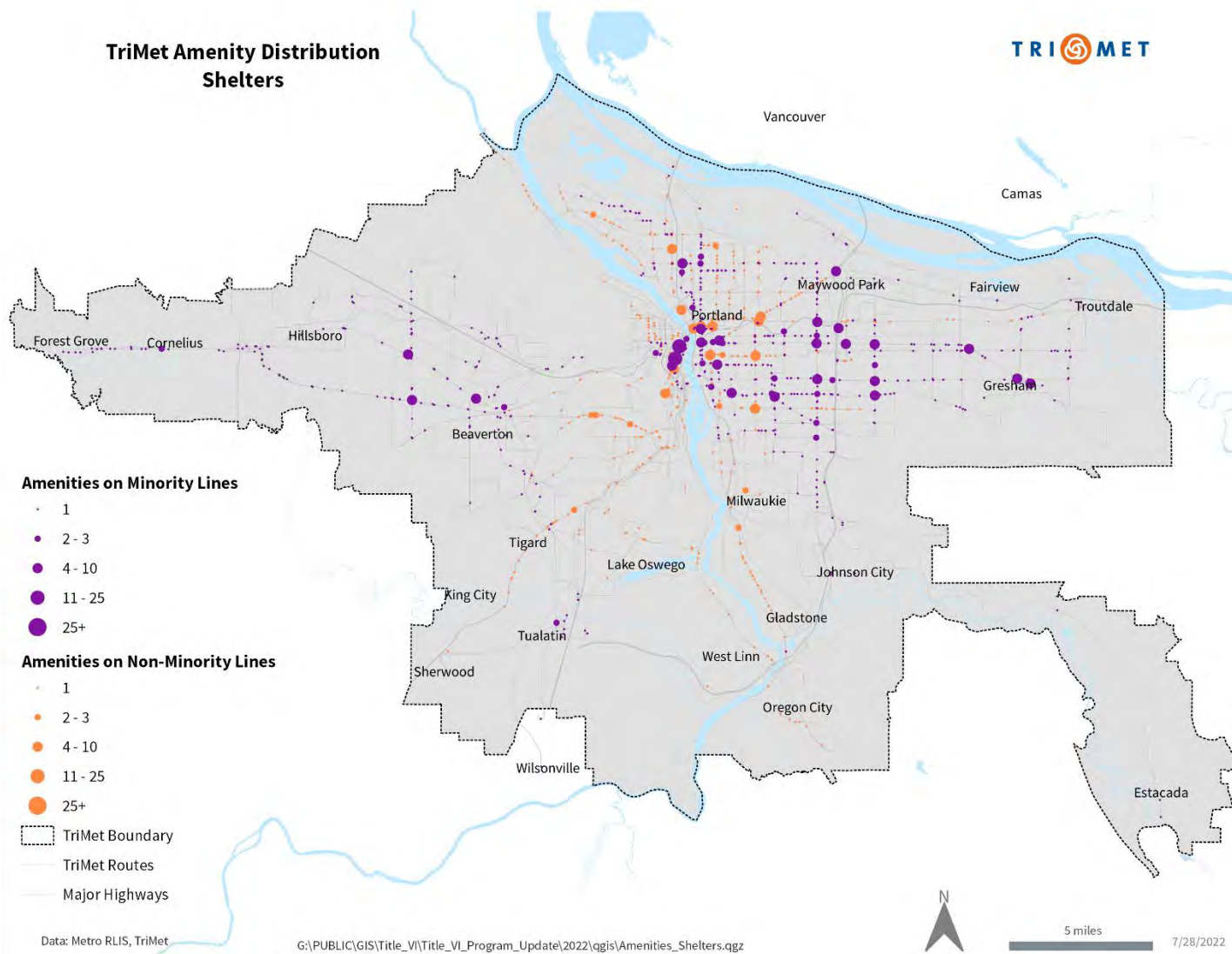




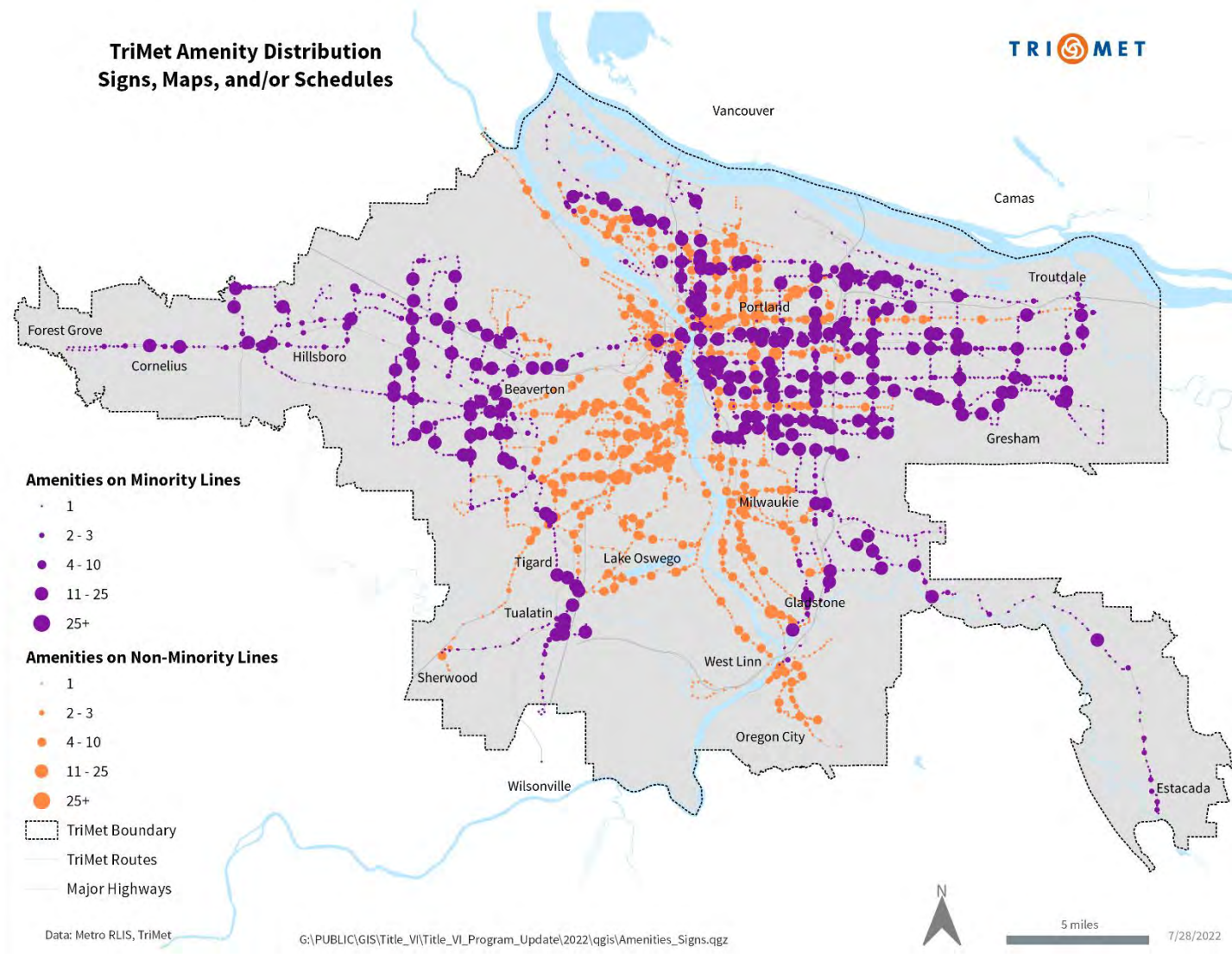
**FIGURE V-27 AMENITY DISTRIBUTION: DIGITAL DISPLAYS**



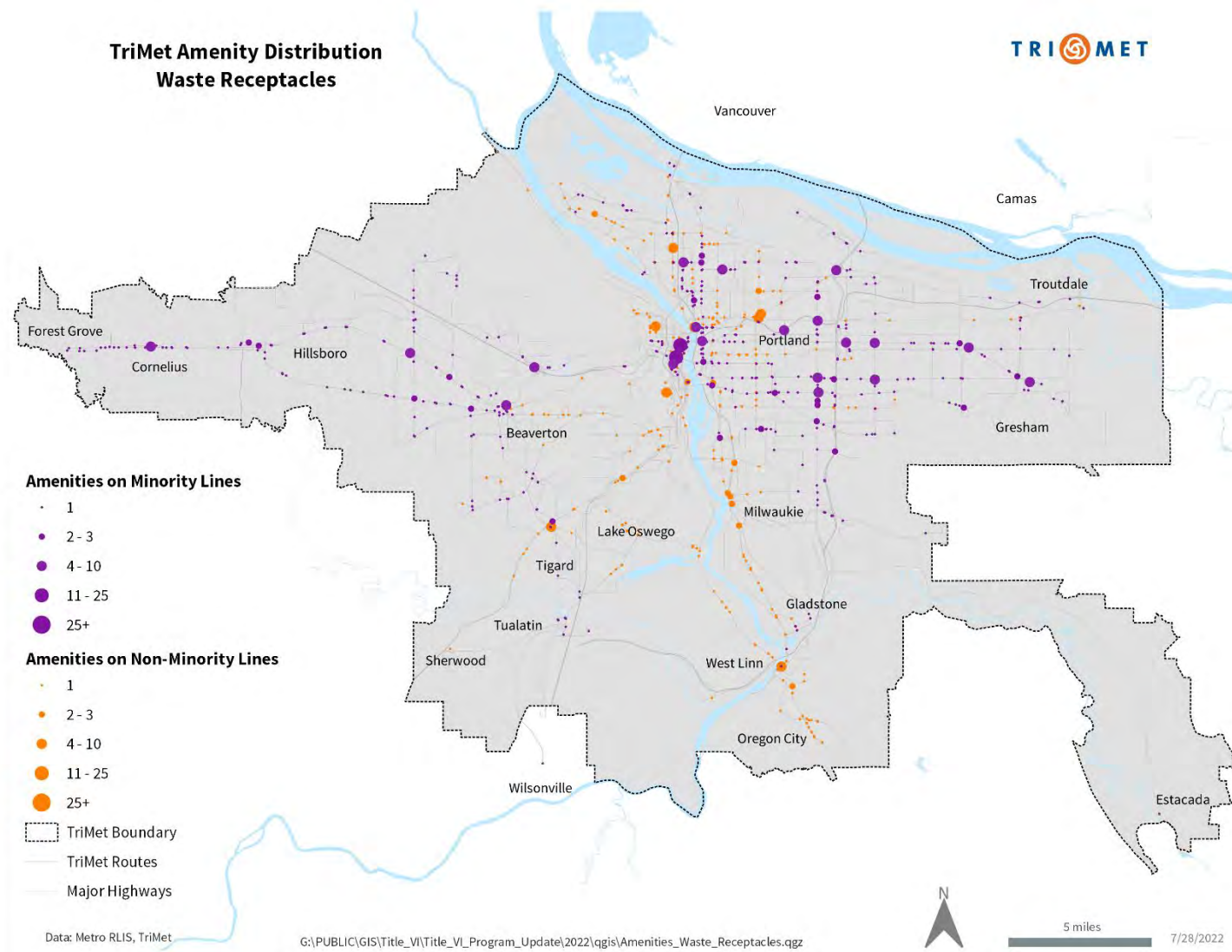
**FIGURE V-28 AMENITY DISTRIBUTION: ELEVATORS**



**FIGURE V-29 AMENITY DISTRIBUTION: SHELTERS**



**FIGURE V-30 AMENITY DISTRIBUTION: SIGNS, MAPS, AND/OR SCHEDULES**



**FIGURE V-31 AMENITY DISTRIBUTION: WASTE RECEPTACLES**


# Attachments

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- A: TriMet Board Resolution 21-09-51 Approving TriMet's Title VI Program and Policies
- B: TriMet Title VI Complaint Form
- C: TriMet Title VI Vehicle Notice
- D: TriMet Title VI Administrative Office Notice
- E: TriMet Public Engagement Framework
- F: Language Access Plan & Implementation Schedule
- G: Subrecipient's Title VI Compliance Template
- I: FY2021 Annual Service Plan Equity Analysis
- K: FY2022 Annual Service Plan Equity Analysis
- L: FY2023 Annual Service Plan Equity Analysis
- M: TriMet Service Guidelines Policy
- N: Equity Index Presentation
- O: Title VI Frequently Asked Questions

**Date:** September 28, 2022

**To:** Board of Directors

**From:** Sam Desue, Jr. 

**Subject:** **RESOLUTION NO. 22-09-51 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) APPROVING ITS UPDATED 2022 TITLE VI PROGRAM**

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**1. Purpose of Item**

This Resolution requests that the TriMet Board of Directors (Board) approve TriMet’s 2022 Title VI Program Update, attached hereto as Exhibit A, for submission to the Federal Transit Administration (FTA) by October 1, 2022.

**2. Type of Agenda Item**

- Initial Contract
- Contract Modification
- Other: Approval of TriMet’s 2022 Title VI Program Update

**3. Reason for Board Action**

TriMet must comply with Title VI regulations issued by the U.S. Department of Transportation (DOT) and the FTA, and as a condition of receiving ongoing federal funds, the FTA requires each transit agency to submit an updated Title VI Program every three years. The FTA regulations require TriMet to brief its Board regarding TriMet’s Title VI Program and related policies (Title VI Program), including the results of its established service monitoring program, and obtain the Board’s approval of the updated Title VI Program before its submission to the FTA.

**4. Type of Action**

- Resolution
- Ordinance 1<sup>st</sup> Reading
- Ordinance 2<sup>nd</sup> Reading
- Other \_\_\_\_\_

**5. Background**

Title VI was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. Pursuant to the Civil Rights Act and DOT and FTA regulations, TriMet has developed and regularly updates its Title VI Program and submits it to the FTA for review every three years on October 1.

Further, in accordance with the Title VI Program, the Board receives extensive Title VI equity analyses related to any proposed service and/or fare changes as part of any proposed Fall and Spring service changes. As a result, the Board is regularly advised as to TriMet’s compliance with Title VI in the delivery of transit services. Each of the previous three

program years of Title VI reviews that have been presented to the Board have been added as attachments to TriMet's updated Title VI Program for submission to the FTA.

The FTA requires the governing board of each large public transit agency to approve Title VI programs, policies and standards concerning the following:

- 1) Major Service Change Policy. A "Major Service Change Policy" is a threshold for when TriMet will conduct a comprehensive analysis of potential adverse effects and disparate impacts of service changes on minority and low-income populations.
- 2) Disparate Impact and Disproportionate Burden Policies. These Policies define the measures and thresholds for determining whether a fare change or major service change will result in a "disparate impact" on minority populations or a "disproportionate burden" on low-income populations.
- 3) System-wide Service Standards and Policies. These Policies are used to determine whether transit service and amenities are distributed equitably to minority and non-minority populations. TriMet's Title VI Program must include the results from monitoring these service standards and policies, as well as document the Board's awareness, consideration and approval of the monitoring results.
- 4) Public Engagement Process. The transit agency must show that its Title VI Program was developed with adequate public engagement, including providing public information and receiving input from minority and low-income populations, non-English speakers and community groups.

TriMet's 2022 updates to its Title VI Program were developed through public input gathered by TriMet's Transit Equity, Inclusion, and Community Affairs Department staff in partnership with community based organizations, as part of the Forward Together initiative and other community engagement efforts.

During the course of the Forward Together public engagement efforts, staff integrated specific Title VI questions into the outreach efforts and surveyed over 5,200 community members, in order to gather community feedback and input on the current Title VI Program and to identify opportunities for growth. TriMet staff worked with non-profit and community-based agency partners in the Access Transit program, Transit Equity Advisory Committee (TEAC), Immigrant & Refugee Community Organization (IRCO) and Portland Neighborhood Associations, and utilized TriMet's monthly Equity on the Move Newsletter to obtain additional input on potential Title VI Program changes. The Forward Together survey was also translated into Spanish, Russian, Chinese, Ukrainian, Vietnamese, and Korean, and TriMet received over 400 non-English responses.

In addition, information on TriMet's Title VI Program, complaint procedures, standards and policies were made available on the TriMet's website for public comment and review beginning in August 2020. During the course of updating the Title VI Program, the TEAC provided feedback on the recommended process changes and helped distribute the Forward Together Title VI Program survey.

As a result of this outreach and review, TriMet has determined that its Title VI Program is working well and has made only minor adjustments to the Program. These minor changes include: 1) continuing to integrate new American Community Survey and 2020 Census Data



into future TriMet Title VI analysis; 2) clarifying that a major service change is measured on service span and service frequency by revenue hours; and 3) continuing to improve Title VI signage to benefit ADA customers and non-English speakers across our vehicles and stations.

The updated 2022 Title VI Program is attached hereto as Exhibit A.

6. **Procurement Process**

This Resolution does not involve a procurement process.

7. **Diversity**

In developing proposed changes to the Title VI Program, TriMet sought input from a wide range of TriMet riders from various ethnic and cultural backgrounds, the general public, community based organizations, and the Transit Equity Advisory Committee (TEAC).

8. **Financial/Budget Impact**

There is no financial impact to making the proposed 2022 updates to TriMet's Title VI Program.

9. **Impact if Not Approved**

TriMet's Title VI Program is required by federal statute and FTA regulations as a condition of receiving federal funding. The Title VI Program must be updated every three years and submitted to the FTA. The Board's approval is required prior to TriMet's October 1, 2022 submission of its updated 2022 Title VI Program to the FTA.

**RESOLUTION NO. 22-09-51**

**RESOLUTION NO. 22-09-51 OF THE TRI-COUNTY METROPOLITAN  
TRANSPORTATION DISTRICT OF OREGON (TRIMET) APPROVING ITS  
UPDATED 2022 TITLE VI PROGRAM**

**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 (DOT) 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, TriMet is required to comply with the requirements of the Act and applicable DOT and FTA implementing regulations; and

**WHEREAS**, pursuant to FTA regulations, TriMet is required to submit its Title VI Program to TriMet's Board of Directors (Board) for approval; and

**WHEREAS**, the Board periodically is briefed on TriMet's Title VI Program in the course of any system service changes or fare changes, including any disparate impacts and/or disproportionate burdens arising from the changes, as well as on the monitoring of TriMet's system-wide service standards and policies, all of which were set forth in the updated 2019 Title VI Program and are continued in the updated 2022 Title VI Program; and

**WHEREAS**, the Board has authority under ORS Chapter 267 to approve by resolution its updated 2022 Title VI Program; and

**WHEREAS**, the Board has determined that TriMet's updated 2022 Title VI Program, attached hereto as Exhibit A, should be approved and submitted to the FTA;

**NOW, THEREFORE, BE IT RESOLVED:**

1. That TriMet's Title VI Program shall conform with applicable law.
2. That the Board hereby approves TriMet's updated 2022 Title VI Program, attached hereto as Exhibit A, and authorizes its submission to the FTA.

Dated: September 28, 2022

  
\_\_\_\_\_  
Presiding Officer

Attest:

  
\_\_\_\_\_  
Recording Secretary

Approved as to Legal Sufficiency:

  
\_\_\_\_\_  
Legal Department

# Tri-County Metropolitan Transportation District of Oregon (TriMet)

1800 SW 1<sup>st</sup> Ave., Suite 300  
Portland, OR 97201

503.962.3453  
trimet.org

## TITLE VI COMPLAINT FORM\*

Title VI of the 1964 Civil Rights Act requires 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.”

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternative formats, please let us know.

Complete and return this form to TriMet, Attn: Civil Rights Title VI Investigator, 1800 SW 1<sup>st</sup> Ave., Suite 300, Portland, OR 97201.

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

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

3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

4. Telephone Number (home): \_\_\_\_\_ (business): \_\_\_\_\_  
Electronic Mail Address: \_\_\_\_\_

5. Are you filing this complaint on your own behalf? \_\_\_\_\_. 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. \_\_\_\_\_

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your (check any box that applies):

a. Race:

b. Color:

c. National Origin:

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

8. In your own words, describe the alleged discrimination. Explain what happened and what policy, program, activity or person you believe was discriminatory.

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

If yes, check each box that applies:

Federal agency

Federal court

State agency

State court

Local agency

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

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

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

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

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

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

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

\_\_\_\_\_  
Date

# TriMet Respects Civil Rights

TriMet operates its programs without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable laws, including Title VI of the Civil Rights Act of 1964 and ORS Chapter 659A. To request additional information on TriMet's Title VI nondiscrimination requirements, or if any person believes they have been aggrieved by an unlawful discriminatory practice under Title VI or other applicable law and would like to file a complaint, contact us at 503-238-7433 (TTY 503-238-5811) or email [administration@trimet.org](mailto:administration@trimet.org).

TriMet tiến hành hoạt động các ban ngành của mình không phân biệt chủng tộc, màu da, nguồn gốc, tôn giáo, giới tính, khuynh hướng tình dục, tình trạng hôn nhân, tuổi tác hoặc khuyết tật sao cho phù hợp với pháp luật hiện hành, bao gồm Điều Khoản Thứ VI của Đạo Luật Dân Quyền Năm 1964 (Title VI of the Civil Rights Act of 1964) và Đạo Luật ORS Chapter 659A. Nếu quý vị cần thêm thông tin về các yêu cầu chống kỳ thị của TriMet dựa trên Điều Khoản Thứ VI, hoặc bất cứ ai cho rằng họ đã bị phiền toái vì những thủ tục kì thị bất hợp pháp như đã nêu trong Điều Khoản Thứ VI hoặc các điều luật khác của pháp luật hiện hành và muốn nộp đơn khiếu nại, xin liên lạc với chúng tôi tại số 503-238-7433 (số cho người khuyết tật 503-238-5811) hoặc gửi điện thư cho chúng tôi tại [administration@trimet.org](mailto:administration@trimet.org).

TriMet(트라이메트)의 모든 프로그램은 1964년 제정된 민권법 VI 편 및 ORS 659A를 포함한 관계 법령에 따라 인종, 피부색깔, 출신국, 종교, 성별, 성적성향, 혼인여부, 나이 또는 장애여부에 따른 차별없이 운영됩니다. TriMet (트라이메트)에서의 VI편 관련 차별 금지 규정에 관한 보다 자세한 자료가 필요하거나, VI편이나 기타 해당 법령에 따른 불법적 차별을 당하여 이의를 제기하고자 하는 분은 전화 503-238-7433 (TTY 503-238-5811)번 또는 전자우편 주소 [administration@trimet.org](mailto:administration@trimet.org) 로 연락하여 주시기 바랍니다.

TriMet opera sus programas sin considerar raza, color, origen nacional, religión, sexo, orientación sexual, estado marital, edad o discapacidad de acuerdo con las leyes pertinentes incluyendo el Título VI del Acta de los Derechos Civiles de 1964, y ORS Capítulo 659A. Para más información sobre los requisitos no discriminatorios de TriMet bajo el Título VI, o si alguna persona piensa que fue agraviada por una práctica discriminatoria bajo el Título VI, y quiere presentar una queja contáctenos al 503-238-7433 (TTY 503-238-5811) o envíe un correo electrónico a [administration@trimet.org](mailto:administration@trimet.org).

Компания «TriMet» осуществляет свою деятельность без дискриминации по расовой принадлежности, цвету кожи, национальному происхождению, религии, полу, сексуальной ориентации, семейному статусу, возрасту, наличию инвалидности в соответствии со всеми применимыми законами, включая часть VI Акта о гражданских правах 1964 года и Главу 659A пересмотренных законов Орегона. Чтобы получить дополнительную информацию о недискриминации, или если кто-либо желает подать жалобу о незаконной дискриминации в соответствии с частью VI или любым другим применимым законом, пожалуйста, свяжитесь с нами по телефону 503-238-7433 (для слабослышащих – 503-238-5811) или напишите эл. письмо на адрес [administration@trimet.org](mailto:administration@trimet.org).

TriMet項目的運作按照適用法律不考慮種族、膚色、國籍、宗教、性別、性取向、婚姻狀況、年齡或殘疾狀況，其中包括1964年民權法案第VI章和ORS第659A章的規定。欲索取更多有關TriMet第VI章非歧視規定，或如果有人已經因為被非法歧視而感到屈辱而希望進行投訴，同時其符合第VI章或其它適用的法律，請聯系我們503-238-7433 (聽力障礙 503-238-5811) 或發電子郵件至[administration@trimet.org](mailto:administration@trimet.org)。

# TriMet Respects Civil Rights

TriMet operates its programs without regard to race, color, national origin, religion, sex, gender identity, sexual orientation, marital status, age or disability in accordance with applicable laws, including Title VI of the Civil Rights Act of 1964, ORS Chapter 659A.403 and the Americans with Disabilities Act of 1990.

## Civil Rights and Public Accommodations is **THE LAW**

TriMet's policy is to fully comply with federal and state laws designed to ensure protected groups who are entitled to enjoy the services of a public accommodation may do so on an equal basis and without discrimination. TriMet's policy is to provide programs and services in which all customers are able to utilize our transit system in a safe and respectful environment, free from discrimination, unfair treatment, or inappropriate conduct by TriMet employees, independent contractors, or other individuals.

Employees are expected to treat our customers respectfully and act professionally in all locations where TriMet work is performed.

TriMet Human Resources Manual Policy 6.14 Civil Rights and Public Accommodations





## TriMet Public Engagement and Outreach Framework May 2022

### Purpose

TriMet recognizes that diverse values and opinions held both individually and as a group contribute to the quality of community life throughout the region. TriMet is committed to engaging the community it serves to ensure diverse public input and equity are part of its transparent policy and decision-making processes.

The general TriMet approach is to engage in a pro-active manner with diverse stakeholders via early, ongoing and meaningful communications. The public engagement process strives to include *all* interested and affected stakeholders – riders, members of vulnerable populations, members of diverse communities, elected officials, civic and business organizations, residents, and property owners to ensure they are provided opportunities for meaningful input.

In proposing any service changes, particularly changes that may result in diminished service, TriMet uses a variety of methods to communicate proposed changes and solicit feedback from the community. TriMet also engages in extensive community outreach in conjunction with large-scale projects to ensure that affected residences and businesses are fully informed of the impacts and benefits and are provided an opportunity for input in planning and implementation. On routes where there are a significant number of limited English proficient riders, TriMet staff will translate materials to ensure those riders can participate. After receiving public input, TriMet will determine whether to continue a service in its current form, change the service, or eliminate the service. Special attention is paid to the identification of any transit-dependent persons potentially affected by a route or service change.

Consistent with the requirements of Title VI, TriMet staff use GIS mapping software.

- Maps are created to identify affected low income, minority, and limited English proficient communities.
- Analysis is shared with TriMet staff working with affected communities to develop strategies to engage minority, low income and LEP populations, and to ensure proposed service changes are in compliance with the requirements of Title VI.

### TriMet Demographic Profile

**Low-income:** TriMet defines low-income persons as someone whose household income is at or below 150% of the federal poverty level. Based on 2012-2016 US Census American Community Survey five-year estimates, 21.6 percent of the population within TriMet's service district are low-income under this definition.

According to the 2012-2016 ACS, 29 percent of the population within TriMet's service district is considered minority. This includes Hispanic or Latino (12.4 percent), Asian (7.5 percent), Black (3.4 percent), American Indian/Alaskan Native (.5 percent), Native Hawaiian/Pacific Islander (.5 percent), and Other Mixed Race (4.2 percent).

TriMet defines LEP by respondent's indication on the Census that they speak English "less than very well."

The US Census Bureau collects data about the ability to speak English as well as the language spoken at home via the American Community Survey (ACS) and allows for the identification of LEP languages falling within the “Safe Harbor” thresholds. The thresholds are 5 percent of total population or 1,000 individuals, whichever is less.

This data below was retrieved for the three-county region (Clackamas, Multnomah, and Washington counties) in which TriMet provides service.

<b>Languages Spoken at Home</b>	<b>LEP Population Estimate</b>	<b>% of Total Population</b>	<b>% of LEP Population</b>
Spanish	51,113	3.3%	43.1%
Vietnamese	14,807	1.0%	12.5%
Chinese (Cantonese, Mandarin)	10,611	0.7%	8.9%
Russian	9,989	0.6%	8.4%
Korean	3,824	0.2%	3.2%
Arabic	2,748	0.2%	2.3%
Ukrainian	2,713	0.2%	2.3%
Tagalog	2,042	0.1%	1.7%
Japanese	1,858	0.1%	1.6%
Khmer	1,486	0.1%	1.3%
Persian/Farsi	1,118	0.1%	1.0%
Other (e.g., Thai & Somali)	22,171	1.4%	18.9%
<b>Total</b>	<b>118,646</b>	<b>7.6.3%</b>	

*Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2016 - 2020 (5-Year Estimates).*



## Public Engagement Process

TriMet's public engagement process is based on nationally-established public participation core values:

1. Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
2. Public participation includes the promise that the public's contribution will influence the decision.
3. Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision makers.
4. Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
5. Public participation seeks input from participants in designing how they participate.
6. Public participation provides participants with the information they need to participate in a meaningful way.
7. Public participation communicates to participants how their input affected the decision.

### A TriMet public engagement plan must include 12 critical elements:

A public engagement plan is required for any significant agency change as well as future planning objectives. Changes include those relating to fares, fare policy, service and capital projects.

A TriMet public engagement plan must include 12 critical elements:

1. Clearly defined purpose and objectives for initiating public dialogue. Shared understanding of the level and type of participation the plan is designed to generate.
2. Clear messages.
3. Specific identification of the potentially-affected public and other stakeholder groups.
  - a. Special effort placed on reaching underserved populations. These may be hard-to-reach groups such as low-income individuals, transit-dependent riders or members of minority communities. Strategies to reach will include going to where people live, work, go to school, practice faith, or shop; and providing culturally-competent materials.
4. Identification of possible barriers to participation among targeted populations and strategies to reduce these barriers.
5. Language needs identified to ensure participation of Limited English Proficiency (LEP) persons.
6. Use four-factor analysis to ensure access for LEP persons:
  - i. number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service;
  - ii. frequency with which LEP individuals come in contact with the program or service;
  - iii. nature and importance of the proposed changes to people's lives; and
  - iv. resources available to the recipient and costs.

7. Identification of engagement strategies and tactics.
8. Education/ information that results in accurate and full public understanding of options (as appropriate) and related issues.
9. Reflection of brand.
10. Info-gathering process outline.
11. Timeline and staff accountabilities.
12. Documentation process.

Before each plan is developed, the following levels of participation are reviewed to ensure clarity on what the agency is seeking. These levels and actions are based on best practices adapted from the International Association for Public Participation.

<b>Possible Level of Participation from Stakeholders</b>			
<b>Inform</b> Provide the stakeholder with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	<b>Consult</b> Obtain stakeholder feedback on analysis, alternatives and/or decisions	<b>Involve</b> Work directly with the stakeholder throughout the process to ensure that stakeholder concerns and aspirations are consistently understood and considered.	<b>Collaborate</b> Partner with the stakeholder in each aspect of the decision including the development of alternatives and the identification of the preferred solution.

<b>Corresponding Commitment</b>			
<b>Inform</b> We will keep you informed	<b>Consult</b> We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how stakeholder input influenced the decision.	<b>Involve</b> We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how stakeholder input influenced the decision.	<b>Collaborate</b> We will look to you for advice in formulating solutions and include your advice and recommendations in the decisions to the maximum extent possible.

## Public Participation Implementation

### Strategies

This section will lay the framework for the public participation strategies to be used in fulfilling the project goals. This will include strategies for:

- Communication and raising awareness about the project.
- Education and discussion about the project and key community issues that could arise with the project.
- Gathering input about what people like and value, as well as what concerns them with the project.
- Gathering input on broader topics of concern related to the project.
- Deliberate possible approaches and changes that are appropriate to achieve the overall goal of the project.

### Methods

Methods used to implement the engagement strategies will be designed to integrate the guiding principles of engagement. Potential methods include:

- Interviews to understand perceptions and attitudes for effective messaging and communication.
- Stakeholder interviews to understand detailed issues, concerns with, and possible approaches to reflect in the service changes.
- Listening sessions with the general public to understand likes and concerns about specific places and gather feedback on the public engagement plan.
- Small-group meetings with existing and new stakeholder groups to gather input on what they value and are concerned about on both specific places and related to the project itself
- Educational open houses to foster more in-depth learning and discussion.
- Booths and presentations at neighborhood and community events and presentations at existing meetings of community organizations

### Tools and Platforms

Specific tools and platforms will be necessary to offer several ways to submit stakeholder feedback. These tools will be used to inform and engage the community about the project, which include:

- Website, including online engagement platform, surveys, etc.
- Social media (Facebook, Twitter, YouTube, Instagram, and others)
- Traditional media, including news releases, press conferences, media interviews and public service announcements
- Email and service alerts
- Traditional advertising in digital and print publications

### Documenting Input and Improving the Process

The final section of the Plan will include the approaches that will be used to gather and document input provided by the public and the methods to help foster a two-way conversation in which questions are answered in a timely, transparent and informed fashion. Also included in this section will be the mechanisms for continually learning from what's working and what needs improvement in the public engagement process. It will include documentation methods for gathering quantitative and qualitative data about participation and strategies for process improvement. This information will be gathered by outreach staff and compiled in CiviCRM, a web-based open-source software for constituency relationship management.



# Language Access Plan

Ensuring meaningful access to TriMet programs and services for people with limited English proficiency.



September 18, 2019

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# MESSAGE FROM THE GENERAL MANAGER

This year, TriMet turns 50!

We believe in a bright future for this region and are committed to being a leader in delivering safe, convenient, sustainable, and integrated mobility options necessary for our region to be recognized as one of the world's most livable places.

As we draw on our values of safety, inclusivity, equity, community and teamwork in all of our activities, our efforts to enhance our service to our Limited English Proficient (LEP) riders and all communities, align with the agency's mission to connect people with valued mobility options that are safe, convenient, reliable, accessible and welcoming to all.

Our updated Language Access Plan reflects our work and commitment to provide meaningful access to vital information and services for LEP stakeholders who use our services, facilities and programs, and whom we engage meaningfully.

Doug Kelsey  
General Manager, TriMet

## EXECUTIVE SUMMARY

On December 14, 2005, the United States Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency.” The Census definition of a Limited English Proficient (LEP) person is “...a person who speaks another language other than English at home and does not speak English well or not at all.”

As a public transit agency, the Tri-County Metropolitan Transportation District of Oregon (TriMet) serves a broad and diverse community. Providing simple access to information about our programs and services for all of our customers, has long been a priority for the agency. TriMet supports the goals of the DOT LEP Guidance and is committed to taking reasonable steps to provide meaningful access to LEP stakeholders who use our services, facilities, and programs, and who attend our meetings and events.

TriMet is committed to complying with the requirements of Title VI, Executive Order 13166, and DOT LEP Implementing Guidance. To prepare a useful Language Access Plan, TriMet conducted a LEP needs assessment as identified in Executive Order 13166. Key elements of the resulting Language Access Plan are as follows:

### LEP Population Identification

LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. Of the LEP populations, the largest group is the Spanish-speakers (46.1%), followed distantly by Vietnamese (11%), Chinese (8.1%), Russian (5.4%), and Korean (2.7%).

Analysis also showed that most of the urban LEP populations located themselves along well-served transit corridors. Comparatively, Spanish-speakers were more widely dispersed than the other language groups – forming both urban and semi-rural communities.

### Language Access Plan Activities

After an extensive review of the of the existing Language Access Plan (LAP), the associated guidelines, and the needs of LEP populations, the LAP Update Committee recommends a continuation of the original two- tiered approach to meeting the needs of LEP communities in the TriMet district.



### Tier One: Successful Activities to Continue

Tier One retained existing programs and activities designed to meet the language needs of regional LEP populations such as: telephone interpreters in virtually any language; multilingual printed materials and multilingual information on the TriMet web site; and continuing development of partnerships with community organizations that serve LEP populations.

### Tier Two: Activities to deepen our focus

Tier Two identified new areas to deepen our focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services. These activities focus on four primary areas:

- 1. Language Assistance:** *How TriMet provides language assistance services by language.* This area relates to providing free language assistance for outreach documents and in-person services. It also guides the evaluation of which documents are vital for translation and the format(s) that most effectively communicate the messages contained in those documents.
- 2. Providing Notice of Language Assistance:** *How TriMet administers notice to LEP persons about the availability of language assistance.* This area provides guidance for providing notice of language assistance on outreach documents, on the system, and providing notice of the Title VI complaint process.
- 3. Monitoring and Updating the LAP:** *How TriMet monitors, evaluates, and updates the LAP.* This area provides guidance for monitoring and compliance of the LAP, maintaining definitions and standards for translation and interpretation services, and program research and administration.
- 4. Training Programs for Personnel:** *How TriMet trains employees to provide timely and reasonable language assistance to LEP populations.* This area provides guidance for the development of curriculum and the incorporation of LAP information into the employee environment in order to prepare all front line and other relevant staff to effectively engage and respond to LEP customers.

As a result of the LEP needs assessment, the agency instituted the *Language Access Plan* dedicated to mitigating language barriers that could prevent LEP customers from accessing agency programs and services. Due to the large size and dispersed nature of the Spanish-speaking LEP population, this community continues to be a main focus of targeted outreach efforts. This outreach program is housed in the Public Affairs Division with the Director of Transit Equity, Inclusion, and Community Affairs Department responsible for the overall program. The Manager for Multicultural Programs is assigned to help develop the program and carry out the day-to-day tasks.

# BACKGROUND

## Legal Basis for Language Assistance Requirements

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations declared by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.
2. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

## Department of Transportation LEP Guidance

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 15, 2005, which states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1A “Title VI and Title VI Dependent Guidelines for FTA Recipients” on April 13, 2007, which requires recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

## Language Access Plan Update Process

Building on the significant work that began in June 2005<sup>1</sup>, a core group from the Transit Equity, Inclusion, and Community Affairs department took on the responsibility to update TriMet's LAP and Guidelines, to develop the 2019-2022 Implementation Schedule, and to update the Four Factor Analysis. Part of the update process included reconvening an inter-divisional workgroup in order to address federal requirements for assessing the needs and providing meaningful access to services to LEP populations, to restore agency commitment for its LEP program and to clarify staff roles and responsibilities.

In September 2018, staff members throughout the agency were selected in accordance with their position and were personally asked to participate. Specifically, the workgroup was to:

1. Complete a needs assessment of LEP persons in the district. The Four Factor Analysis (refer to Exhibit 2) assessment permitted staff to identify high concentrations and frequency of contact of LEP populations, to ascertain the nature and importance of TriMet services and programs as well as to determine if there were language barriers limiting the access of LEP persons to TriMet services.
2. Update the LAP and Implementation Schedule providing a framework for the provision of timely and reasonable language assistance to those with limited English proficiency who access TriMet's services and a method to evaluate and review the effectiveness of a LAP.
3. Report findings to management with recommendations and timelines for compliance with federal regulations.

Staff members from Transit Equity, Inclusion, and Community Affairs and Legal Services were tasked with developing a work plan and helping the inter-divisional workgroup complete the LAP update in a timely manner. To that end, a work plan with designated tasks and timelines was developed. This process allowed for a methodical, focused approach to the assessment; and defined deliverables, assigned tasks, and clarified roles and responsibilities. The following is a summary of the results from their work.

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<sup>1</sup> Of note, TriMet received grant funding from the FTA Civil Rights Division to develop and implement a demonstration program for its LEP program. TriMet was the only transit authority in the nation to receive this grant funding.

# LANGUAGE ACCESS PLAN

## The Language Access Plan

After a review of the 2019 Four Factor Analysis and the programs 2019 LEP awareness survey, for the LEP populations and their needs, the LEP Workgroup recommended a two-tiered approach to meeting the needs of LEP populations in the TriMet district. *Tier One* retains successful programs and activities designed to meet the language needs of LEP populations. *Tier Two* outlines areas of focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services.

### LEP Population Identification

LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. Thirteen languages meet the LEP threshold. The largest proportion consists of Spanish-speaking LEP individuals (3.8% of the total population and 46% of the LEP population), followed by Vietnamese (0.9% of the total population and 11% of the LEP population).

The percentage breakdown for the top five languages is as follows:

- Spanish – 46.1%\*
- Vietnamese – 11.1%
- Chinese – 8.1%
- Russian – 5.4
- Korean – 2.7%

TriMet language access program work has focused on the Spanish-speaking LEP population as it continues to be the largest LEP community in the region followed by the other top four languages. This approach is envisioned to continue while exploring new ways to engage and more effectively serve other LEP communities.

### LEP Activities

#### **Tier One: Successful Activities to Continue**

Tier One retains existing programs and activities designed to meet the language needs of regional LEP populations such as: telephone interpreters in virtually any language; multi-lingual printed materials and multi-lingual information on the TriMet web site; and continuing development of partnerships with community organizations that serve LEP populations. The following activities will continue:

1. Provide telephone interpreters via customer service at 503-238-RIDE to assist LEP customers.
2. Print *How to Ride* brochures in the thirteen languages that meet the LEP threshold.
3. Post PDF files of How to Ride brochure on TriMet website.

4. Feature key transit information and online [Trip Planner](#) in Spanish on TriMet's website.
5. *Transit Tracker by Phone* information in Spanish via 503-238-7433.
6. Place target language ads in publications serving targeted language populations to demonstrate TriMet's commitment to full information, share current service-related announcements.
7. MAX (light rail system) announcements in both Spanish and English.
8. Spanish-language interface for Ticket Vending Machine (TVM) transactions.
9. Establish and nourish partnerships and continue to work closely with community organizations that serve LEP populations.
10. Civil Rights notification and complaint process in all safe Harbor languages on TriMet website.
11. Civil Rights Notification in all TriMet vehicles and transit centers in top five languages.
12. Print multi-lingual Hop Fastpass brochure.
13. Provide printable program application information for the Income-Based Fare Reduction program in all 13 threshold languages on [trimet.org/lowincome](http://trimet.org/lowincome).
14. Identification of LEP language needs as new transit projects are being planned.

## **Tier Two: Activities to Deepen our Focus**

Tier Two identified new areas to deepen our focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services. These activities ensure continuity of our efforts by deepening our understanding of our commitment and responsibility. These activities focus on four primary areas:

- 1. Language Assistance:** *How TriMet provides language assistance services by language.* This area relates to providing free language assistance for outreach documents and in-person services. It also guides the evaluation of which documents are vital for translation and the format(s) that most effectively communicate the messages contained in those documents.
- 2. Providing Notice of Language Assistance:** *How TriMet provides notice to LEP persons about the availability of language assistance.* This area provides guidance for providing notice of language assistance on outreach documents, on the system, and providing notice of the Title VI complaint process.
- 3. Monitoring and Updating the LAP:** *How TriMet monitors, evaluates, and updates the LAP.* This area provides guidance for monitoring and compliance of the LAP, maintaining definitions and standards for translation and interpretation services, and program research and administration.

**4. Training Programs for Personnel:** *How TriMet trains employees to provide timely and reasonable language assistance to LEP populations.* This area provides guidance for the development of curriculum and the incorporation of LAP information into the TriMet employee environment in order to prepare all front line and other relevant staff to effectively engage and respond to LEP customers.

### Implementation Calendar

In consideration of implementation factors including available resources and costs, the LAP utilizes a staggered implementation schedule over several years. The following calendar illustrates LAP activities, tasks, and implementation years.

LAP Update Schedule	Target Completion = X		
Task	FY '20	FY '21	FY '22
<b>Language Assistance</b>			
Create a standard LEP Handbill for use by outreach staff when providing notice of language assistance.	X		
Engage LEP communities in identifying Vital Information and ensuring that it is communicated in language.	X	X	X
Add LEP Materials for partners to order via trimet.org/dc.	X		
Conduct next round of LEP primary research survey and focus groups.			X
Incorporate Language code into Item Code footer for collateral.	X		
Develop a tool that walks staff through the steps to take when determining which languages should be served when translating for a project.	X		
Work with partners to include preferred language for listserve registration forms.	X		
Create updated versions of How To Ride videos in identified languages.	X		
Create file repository for translated documents and Creative Service request forms.	X		
<b>Providing Notice of Language Assistance</b>			
Develop and launch Language Assistance brand.		X	X
Update right to language assistance postings.	X		
Update the Notice of Civil Rights Complaint Process postings.	X		
Build out notice of meetings for different Customer Information Channels.		X	
Identify a way to provide notice of language assistance when using mass emails. (i.e.: .gov)		X	
<b>Monitoring and Updating the LAP</b>			
Build out LAP Program Team and staff roles.	X		

Clarify/formalize proof reading and quality control for translations.	X		
Clarify/formalize process for working with contracted interpreters and translators.	X		
Annual LAP Reviews	X	X	X
Build out process for ensuring language assistance and/or translated information is provided when necessary.	X	X	
Create a LAP Advisory Committee that contains community members who can inform our efforts to engage and support LEP riders.	X		
Build out a network of trusted individuals that are able to help review translated materials.	X	X	X
<b>Training Programs for Personnel</b>			
All frontline staff will be trained on how to use telephone interpretation.			X
Establish TriNET page for LEP resources that can be utilized by TriMet staff.	X		
All relevant staff will be trained in process for requesting translation and interpretation services.	X	X	X
Incorporate LEP resources into onboarding and orientation process for relevant staff.			X
Revisit LAP Training needs for staff.	X		
Update LAP trainings based off of needs assessment.		X	
Develop LEP Resources slides for monitors in breakrooms.	X		
Develop follow up training to LAP Training that is specific to different department staff and covers the resources available and how to use them.			X
Explore the creation of language based Employee Resource Groups.	X		
<b>Campaigns</b>			
Hop Fastpass	X	X	X
Low Income Fare	X	X	X
Southwest Corridor	X	X	X
Division Transit Project	X	X	X
Administrative Citation Process	X	X	X

# PROGRESS SUMMARY

## Major Milestones

In August 2018, TriMet's Transit Equity, Inclusion, and Community Affairs (TEICA) department formed a Language Access Plan Update Committee to assist in the task of updating the LAP to further the agency's effectiveness in providing meaningful access to LEP customers. The committee conducted outreach to LEP communities, convened meetings across TriMet divisions, updated LEP guidelines adopted in 2010, and developed an updated implementation timeline. Refer to Exhibit 1 for the full text of all Guidelines.

A 24-item survey instrument was translated into all 13 "safe harbor" languages. Surveys were distributed in-person at community meetings and events, direct email, and through targeted Facebook ads. The LEP engagement period started February 21, 2019 and ended May 17, 2019. A total of 962 surveys were collected. This represents one of the largest engagements of LEP persons in TriMet history. Refer to Exhibit 2 – 2019 Four Factor Analysis (Appendix A: Language Access Survey Report) to view the survey report.

Staff from the Transit Equity, Inclusion, and Community Affairs (TEICA) department distributed the surveys in-person by attending an immense number of community events and meetings. Through built partnerships with key organizations and established relationships with community leaders, TEICA staff received support from the following key organizations: Latino Network, Verde, El Programa Hispano, Centro Cultural, Consulado Mexicano, Immigrant & Refugee Community Organization (Slavic Advisory Board), and Asian Health and Services Center. Staff contacted other community organizations and public entities working with Spanish-speaking community members via telephone and via e-mail. TEICA staff shared the survey with key individual from the following organizations: Voz Worker Education Project, Consulado Mexicano, Mandos Mundo, Oregon Latino Action Agenda, Oregon Latino Health Coalition, OPAL, Educate Ya, American Friends Service Committee, Multnomah County Library, Multnomah County Health Department, Los Niños Cuentan, Gresham School District, Portland Public Schools ESL and Dual Language Immersion Programs, Hispanic Metropolitan Chamber of Commerce, Human Solutions, Central City Concern, Transition Projects, Virginia Garcia Clinic, Adelante Mujeres, Lara Media, Hispanic Pros, Rosewood Initiative, Archdiocese of Portland Ministerio Hispano, Portland ESL Network, et al.

TEICA staff made presentations and surveyed Spanish-speaking parents participating at Latino Network Juntos Aprendemos Programs at the following schools:

- Ventura Park Elementary
- Mill Park Elementary
- Shaver Elementary
- Cesar Chavez Elementary



- Glenfair Elementary
- Tualatin Elementary
- Harvey Scott Elementary
- Rigler Elementary
- Tigard Elementary
- Bridgeport Elementary

Staff also made presentations and surveyed participants in the Latino Network’s program Soñemos Juntos, Bienestar’s Equipo of Service Providers, El Programa Hispano Catolico, meetings at the Asian Health and Service Center and IRCO Senior Lunch as well as participants at a group gathering at the Baltazar Ortiz Center, Mill Park School Pantry, Madison High School Pantry, Shaver Food Pantry, and the Open Bible Harvest Share. Lastly, staff participated with the survey at Consulado Mexicano’s Ventatilla Financiera event, and at Cinco de Mayo in Portland.

## Program Updates

- LEP outreach and language assistance has been provided to Vietnamese, Russian, Chinese, Korean, and Spanish-speaking LEP persons for issues related to fare changes, capital projects, and new service.
- In advance of migrating to an electronic fare (eFare) system, TriMet held discussion groups to assess potential impacts of such a change. One of these groups was held in Spanish, while two others were held in English with Spanish, Arabic, Somali, and Nepali interpretation.
- In early 2016, TriMet partnered with community-based organizations to conduct focus group meetings with Spanish, Vietnamese, Russian, and Nepalese speakers. Staff also hosted a booth at a community “Noche Latina” event. The purpose of this outreach was to help inform a vision for future bus service in the TriMet district. It included a questionnaire to get a better understanding of how participants use TriMet as well as their needs and priorities.
- As part of an effort to review practices surrounding enforcement of fare payment, TriMet partnered with several Community-Based Organizations to host listening sessions on the topic in summer 2016. Two of these listening sessions were held in Spanish, and another was in English with Vietnamese interpretation as most participants spoke Vietnamese.
- TriMet’s web page contains links to information in Spanish, Vietnamese, Russian, Chinese, and Korean. In addition, the landing page for Spanish now contains a Trip Planner in Spanish.

- Spanish speakers can also access TransitTracker (real-time arrival information) in Spanish by calling 503-238-7433 thereby accessing real time information on the next train or bus arrival. The Spanish “prompt” was moved to first place on the menu.
- All LEP customers can access language assistance by calling 503-238-7433. In the next year, customer service staff will explore the feasibility of having a dedicated telephone number for targeted languages to better serve LEP customers.
- TriMet provides notice to the public regarding its Title VI obligations and has notified the public regarding TriMet’s obligations to provide programs and services without regard to race, color or national origin. TriMet disseminates notice of its Title VI obligations and the right to file a Title VI complaint through the agency’s website, onboard notification on all transportation vehicles, transit centers, and TriMet’s downtown customer assistance office where passes and tickets are sold.
- TriMet has created a website in Spanish for Hop Fastpass, the electronic fare payment system. At myhopcard.com/es Spanish-speaking LEP’s can manage their electronic fares.
- The Division Transit Project includes targeted outreach, including project fact sheets and print advertisements for community events in Spanish, Vietnamese, Russian, and Chinese. A field office will open in late 2019, staffed by bi-lingual staff (English/Spanish) who will work closely with neighbors and businesses as construction begins.
- The Southwest Corridor Light Rail Project team includes bi-lingual staff who conduct outreach at community events. Project materials include fact sheets in Spanish, Swahili, and Arabic. Other outreach efforts include a webpage, survey, and social media targeted promotions in Spanish about the project’s Park & Ride and station access.
- TriMet has developed channel cards in Spanish for placement on all TriMet vehicles that communicate vital customer information for the following: Fare requirements, availability of TriMet customer assistance in Spanish, and the rules for riding. Planning is underway to develop similar channel cards in other targeted languages.
- In 2019, TriMet finalized updating the bilingual (Spanish/English) faceplates for Ticket Vending Machines to reflect Hop Fastpass and the electronic message interface.
- In 2018 TriMet established an administrative process to resolve fare citations and provided code enforcement personnel with a multilingual envelope (including the 13 languages that meet the LEP threshold) with the instruction to call 503-238-7433 to resolve the citation.
- TriMet established a Low Income Fare program and contracted with community organizations to extend its reach to culturally specific and LEP communities. All informational materials were created in either the top 5 languages or in all 13 threshold languages. Targeted media campaigns were conducted in Spanish, Russian, Vietnamese, and Chinese. In addition, TriMet hired an outreach staff

person that is able to communicate in Spanish, Russian, and Ukrainian adding strength to the LEP efforts.

- TriMet conducted multiple budget forums hosted by community-based organizations serving LEP communities through a Multicultural Contract in place that draws from a pool of agencies and community-based organizations serving communities of color and LEP communities.
- TriMet staff is working on updating TriMet's *How to Ride* videos and coordinating with non-profit organization to use in travel training session with LEP newcomers. These videos will be posted on TriMet's YouTube channel and shared through social media.
- TriMet contracted with Lara Media, C + C Consulting, and Asian Pacific Network of Oregon (APANO) to develop marketing concepts to promote Hop Fastpass in the Spanish speaking community and in the Vietnamese and Chinese community. The result of those efforts will be a greater investment on TV, Radio, and print ads in targeted languages in the coming years.
- Options to include Language Assistance notification signage are being explored on TriMet vehicles, bus stop signs, and transit centers.
- Multilingual channel cards on TriMet vehicles for Hop Fastpass will also be considered, as well as on bus benches and bus shelters.

# LAP Program Material Examples



<https://trimet.org/meetings/hb2017/pdfs/public-transportation-improvement-plan.pdf>

**Get Help With Your Transportation Costs**  
**Reduced Fare Based on Income**  
 You may be able to ride public transportation for less. TriMet's Reduced Fare gives you a more affordable way to get to work, school, shopping or services.

**Who Qualifies?**  
 18-65, Oregon Resident, less than twice the federal poverty level

**Learn more and apply today**  
 Visit [trimet.org/lowincome](http://trimet.org/lowincome) or call 503-238-7433

**Obtenga ayuda para sus costos de transporte**  
**Tarifa reducida basada en los ingresos**  
 Es posible que pueda usar el transporte público por menos. La tarifa reducida de TriMet le da una forma más asequible de ir al trabajo, a la escuela, ir de compras o a los servicios.

**¿Quién califica?**  
 18-65, residente de Oregon, menos del doble del nivel de pobreza federal

**Conozca más y solicítela hoy**  
 Visite [trimet.org/lowincome](http://trimet.org/lowincome) o llame al 503-238-7433

**교통 요금에서 도움을 받아보세요**  
 소득 기준 할인 요금  
 당신은 더 적은 비용으로 공공 교통을 이용할 가능성이 있습니다. TriMet 할인 요금은 출근, 등교, 쇼핑, 또는 서비스를 이용할 때 지불에 도움을 드리기 위한 것입니다.

**어떤 사람에게 자격이 있나요?**  
 18-65세, 오리건 주민, 연방 빈곤선 2배 미만

**좀 더 알아보시고 오늘 신청하세요**  
[trimet.org/lowincome](http://trimet.org/lowincome)에 방문 또는 503-238-7433에 전화

**Отримання допомоги для користування транспортом**  
 Зменшені тарифи з урахуванням доходу  
 Можливо, Ви зможете їздити на громадському транспорті дешевше. Зменшений тариф TriMet надає Вам більш доступний спосіб дістатися до роботи, школи, магазину або пошуку.

**Хто може прийняти участь?**  
 18-65, резидент штату Орегон, трохи менше ніж удвічі перевищує федеральний рівень бідності

**Дізнайтеся більше та подайте заявку сьогодні**  
 Відвідайте веб-сайт [trimet.org/lowincome](http://trimet.org/lowincome) або зателефонуйте за номером 503-238-7433

**ទទួលបានជំនួយកាត់ថ្លៃដឹកជញ្ជូនសមស្របសម្រាប់អ្នក**  
 កាត់ថ្លៃដឹកជញ្ជូនសមស្របសម្រាប់អ្នកដែលមានចំណូលទាបជាងមធ្យម  
 អ្នកអាចអាចរៀនសូត្រដោយប្រើប្រាស់ថ្លៃដឹកជញ្ជូនសមស្របសម្រាប់អ្នកបាន។ ថ្លៃដឹកជញ្ជូនសមស្របសម្រាប់អ្នកនេះផ្តល់ជូនការងារដល់អ្នកដើម្បីទៅធ្វើការ រៀនសូត្រ ទៅសាលា ទៅទិញទំនិញ ទៅទិញសម្ភារៈសម្រាប់ការងារ ទៅទិញសម្ភារៈសម្រាប់ការងារ ទៅទិញសម្ភារៈសម្រាប់ការងារ។

**តើនរណាគួរបានជំនួយ?**  
 ពលរដ្ឋដែលរស់នៅ Oregon ដែលមានអាយុចាប់ពី 18-65 ឆ្នាំ និងមានចំណូលទាបជាងមធ្យមស្របតាមការប៉ាន់ស្មានសរុប

**សូមពិនិត្យលក្ខខណ្ឌ និងព័ត៌មានបន្ថែម**  
 ចូលមើលគេហទំព័រ [trimet.org/lowincome](http://trimet.org/lowincome) ឬទូរស័ព្ទទៅលេខ 503-238-7433

**در هزینه های حمل و نقل خود صرفه جویی کنید**  
 تخفیف کرایه بر مبنای درآمد  
 اکنون سفر ارزانتر یا ناگزیر حمل و نقل عمومی میسر است.  
 طرح تخفیف کرایه TriMet را میفرمایید به صرفه نوبی برای رفت و آمد به محل کار، مدرسه، مراکز خرید یا خدماتی پیش پای شما می گذارد.

**افراد واجد شرایط؟**  
 18-65 سال، ساکن اورگن، درآمد کمتر از دو برابر استاندارد فقر فدرال

**اطلاعات بیشتر و ثبت نام**  
 به آدرس [trimet.org/lowincome](http://trimet.org/lowincome) رجوع کنید یا با شماره 503-238-7433 تماس بگیرید.

**TRI MET**  
**Respects Civil Rights**

TriMet respeta los derechos civiles  
 TriMet Tôn trọng Dân quyền  
 TriMet 尊重公民权利  
 TriMet уважает гражданские права  
 TriMet은 시민권을 존중합니다  
 TriMet поважає громадянські права  
 TriMetは市民の権利を尊重します  
 Iginagalang ng TriMet ang Karapatan ng Mamamayan  
 TriMet respectă drepturile civile ale cetățenilor  
 تحترم الحقوق المدنية  
 TriMet គោរពសិទ្ធិពលរដ្ឋ  
 حقوق مدنی را محترم میشمارد  
 TriMet waxay Tixgelligaa Xuuqaha Madaniga ah



## RULES FOR RIDING

- **Don't threaten or intimidate riders or operators.**  
*No amenace ni intimide a otros pasajeros ni al conductor.*
- **Don't be so loud that you disturb others.**  
*No haga ruidos que molesten a los demás.*
- **Don't block the aisles or doors.**  
*No bloquee los pasillos o puertas.*
- **Valid and correct fare is required.**  
*Se requiere boleto apropiado y válido.*
- **In the priority seating area, move for seniors and people with disabilities.**  
*En el área de prioridad, ceda el asiento a personas de edad avanzada y personas con discapacidad.*
- **Unless it's a service animal, your pet must be kept in a carrier.**  
*Su mascota debe viajar en una jaula a menos que sea un animal de servicio.*
- **No eating on board, but you can bring food or drinks in closed containers.**  
*No se permite comer a bordo. Puede transportar comida o bebidas en recipientes cerrados.*

## Proposed Route Change 79 Clackamas/Oregon City



We recently proposed a couple changes — first, we want to reroute Line 79 to 82nd Drive, I-205 and Washington Street. This would provide a more direct trip and eliminate service on Strawberry Lane.

Second, we want to add a new route between Clackamas Town Center and Oregon City Transit Center via Thiessen, Webster, Arlington and McLoughlin (see map).

Before we finalize this plan, we want to know what you think. Weigh in at [trimet.org/plan](http://trimet.org/plan) or call 503-238-7433, open 7:30 a.m. - 5:30 p.m., every day. Comments due by March 4.

## Propuesta de cambio de ruta 79 Clackamas/Ciudad de Oregon

Recientemente propusimos un par de cambios: un primer lugar, queremos redirigir la ruta de la línea 79 hacia 82nd Drive, I-205 y Washington Street. Esto facilitará un viaje más directo y eliminará el servicio en Strawberry Lane.

En segundo lugar, queremos agregar una ruta nueva entre el Clackamas Town Center y el Centro de Tránsito de la ciudad de Oregon hacia Thiessen, Webster, Arlington y McLoughlin (ver mapa).

Antes de terminar este plan, queremos saber lo que piensa. Envíe sus opiniones a [trimet.org/plan](http://trimet.org/plan) o llámeme al 503-238-7433, abierto todos los días, de 7:30 a.m. a 5:30 p.m. Aceptaremos comentarios hasta el 4 de marzo.



TRIMET



*"TriMet ha sido el mejor trabajo que he tenido. Se lo recomiendo a quien disfrute manejar, y esté buscando un cambio de carrera."*

Gana más de \$60,000 al año con excelente beneficios, y disfruta del paisaje.

### Evento de Contratación de Chofer de Autobús\*

Jueves, Junio 20 • 2 a 6 PM

Sesión Informativa 2:30 a 3:30 PM

Sesión sobre Oportunidades Laborales 4 PM a 5 PM

Oregon Convention Center

777 NE Martin Luther King Jr. Blvd

*\*El puesto requiere dominio del inglés, ya que los exámenes y el entrenamiento se dan en inglés.*

TRIMET  
[trimet.org/driveforus](http://trimet.org/driveforus)

\*Met es un empleador con igualdad de oportunidades, y con el compromiso de demostrar una organización que es equitativa y es sensible a las necesidades de todos. Si tiene alguna discapacidad, o si necesita un acomodamiento, por favor comuníquese con el departamento de Recursos Humanos.

Hop Fastpass®: tu tarjeta para viajar en TriMet, C-TRAN y Portland Streetcar.

- ✓ Simplemente toca el lector con tu tarjeta Hop o teléfono\* para pagar tu pasaje
- ✓ Obtén pases automáticamente cuando usas tu tarjeta
- ✓ Recarga desde cualquier parte utilizando el sitio web o la aplicación

\*Puedes comprar un pasaje para Clackamas si estás en un viaje de origen TriMet, Oregon City o Salem. \*Paga con una tarjeta virtual Hop en la aplicación.

CTRAN TRI MET PORTLAND STREETCAR

Para obtener más o obtener una tarjeta, visita [mhopcard.com/es](http://mhopcard.com/es)

1-844-694-6722

For language assistance, call si necesita intérprete, llame al número de ayuda al cliente.

hop es tu nueva tarjeta para viajar.

# Service Alert

## Stop Change

Beginning Sunday, March 3, new Line 31-Webster Rd, with service to Clackamas Town Center, will also serve this stop.



Для службы языковой поддержки 503-238-7433  
Si necesita intérprete, llame al 503-238-7433

TRIMET

[trimet.org](http://trimet.org)  
503-238-RIDE (7433)

TRIMET

English • Español • Tiếng Việt • Русский  
中文 • العربية • Română • 한국어 • 日本語  
Tagalog • Igbo • Somali • Українська • فارسی

Fares and how to ride  
Tarifas y cómo viajar  
Giá vé & cách đi xe Bus, MAX  
Плата за проезд и как пользоваться  
票价以及如何乘车  
قيمة التذاكر و دليل المواصلات  
Prețul călătoriei și cum să folosiți sistemul de transport  
요금과 탑승 방법  
料金と乗車方法  
Pamasahe at kung paano sumakay  
ပုံနှိပ်မှုကုန်ပစ္စည်းများ  
Noolka iyo sida loo raaco  
Плата за проїзд та як користуватися  
عنوان جلد چگونگی استفاده و وسایلتقلیه

Effective  
Sept. 2, 2018

Para resolver esta infracción, visite [trimet.org/citation](http://trimet.org/citation) o llame al 503-238-7433.

Để giải quyết giấy phạt này, xin vào trang mạng [trimet.org/citation](http://trimet.org/citation) hoặc gọi số 503-238-7433

要決定该引证, 访问 [trimet.org/citation](http://trimet.org/citation) 或拨打 503-238-7433.

Для решения ссылки перейдите на [trimet.org/citation](http://trimet.org/citation) или позвоните по номеру 503-238-7433.

이 문장에 대한 문제를 해결하려면, [trimet.org/citation](http://trimet.org/citation)에 방문하거나 503-238-7433 에 전화하세요.

Для вирішення цього посилання перейдіть на [trimet.org/citation](http://trimet.org/citation) або зателефонуйте за номером 503-238-7433.

この召喚状を解消するには、[trimet.org/citation](http://trimet.org/citation)にアクセスするまたは503-238-7433に電話してください。

Upang malutas ang usapin na ito, bisitahin ang [trimet.org/citation](http://trimet.org/citation) o tumawag sa 503-238-7433.

Pentru soluționarea unei citații, vizitați [trimet.org/citation](http://trimet.org/citation) sau sunați la nr. 503-238-7433.

لحل هذا الانتهاك، [trimet.org/citation](http://trimet.org/citation) او اتصل برقم 503-238-7433 لتفضل بزيارة

ដើម្បីដោះស្រាយជំហានការហាមឃាត់: សូមចូលមើលគេហទំព័រ [trimet.org/citation](http://trimet.org/citation) ឬហៅទៅសំព័ន្ធពីការទូរស័ព្ទ 503-238-7433។

مراجعة کنید یا با شماره 503-238-7433 تماس بگیرید. [trimet.org/citation](http://trimet.org/citation) برای حل و فصل این احضاریه به

Si loo xalliyo ka so xigashadaani, booqo [trimet.org/citation](http://trimet.org/citation) ama wac 503-238-7433.



## This envelope contains a citation for not having a valid TriMet fare.

You may be eligible to avoid court and receive a reduced penalty by resolving this citation directly with TriMet. To take advantage, complete one of the options in the green box within the listed time. After 90 days, the yellow box contains your only option.

### Here are your options to resolve this citation with TriMet

WITHIN 45 DAYS

#### A. Appeal your citation

You may be eligible for an appeal hearing to demonstrate that you had the correct fare. Appeals must be requested within **45 days** of receiving this citation. If the citation is not dismissed after the appeal, you can still resolve it in one of the ways below within **90 days** of issuance of the citation. Visit [trimet.org/citation](http://trimet.org/citation) for details.

#### B. Pay a fine

- \$75 (1st offense)  \$150 (3rd offense)
- \$100 (2nd offense)  \$175 (4th offense and beyond)

Within **90 days** pay the reduced fine listed above. Visit [trimet.org/citation](http://trimet.org/citation) or call 503-238-RIDE (7433) for payment options. Note: Your citation will be available to pay online within 5-7 days.

#### C. Perform community service

- 4 hours (1st offense)  12 hours (3rd offense)
- 7 hours (2nd offense)  15 hours (4th offense and beyond)

Community service hours must be completed and approved by TriMet within **90 days**. See [trimet.org/citation](http://trimet.org/citation) for details.

#### D. Enroll in our low-income fare or honored citizen programs

If you successfully sign up for our low-income fare or honored citizen program and load \$10 on your HOP card within **90 days**, your fine could be reduced to zero upon verification by TriMet. Visit [trimet.org/citation](http://trimet.org/citation) or call 503-238-RIDE (7433) to see if you qualify and for additional details.

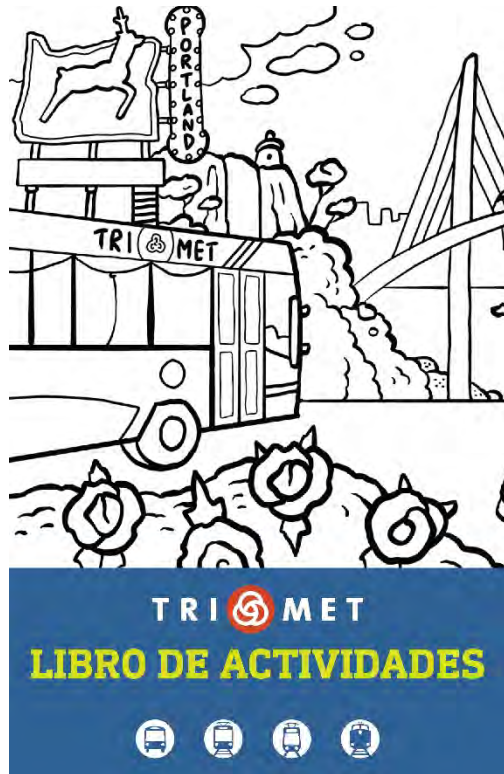
WITHIN 90 DAYS

### If you do not resolve this citation within 90 days

After **90 days**, you **must** resolve this citation in court by following the instructions on the enclosed citation. Your fine will likely increase. Once filed in court, the presumptive fine is \$175 and the maximum fine is \$250.

SOURCE: ORS 267.153; TRIMet Code 29.35

13068 • JUNE 2014



"TriMet ha sido el mejor trabajo que he tenido. Se lo recomiendo a quien disfrute manejar, y esté buscando un cambio de carrera."

Gana más de \$60,000 al año con excelente beneficios, y disfruta del paisaje.

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\*El puesto requiere dominio del inglés, ya que los exámenes y el entrenamiento se dan en inglés.



\*We are an employer with equal opportunity. We are an affirmative action employer. We are an equal opportunity employer. We are an equal opportunity employer. We are an equal opportunity employer.

# EXHIBIT

1. LAP Guidelines
2. Four Factor Analysis

**Exhibit 1: LAP Guidelines**



## Guidelines Index

#	Guideline	Purpose
<b>1</b>	<b>Language Assistance</b>	<b>How TriMet provides language assistance services by language</b>
1A	Use of In-person Interpreter Services at Public Meetings	To provide, at no cost, in-person interpreter services upon request for public meetings, and important events.
1B	Written Translation of Vital Documents	To implement a procedure to provide for written translation of vital documents.
1C	Customer Information Channels	To provide information about TriMet services in multiple languages using the Four Factor Analysis to determine need.
1D	Culturally-Responsive Outreach	To develop and implement culturally-competent outreach to increase awareness of and access to TriMet services and programs.
<b>2</b>	<b>Providing Notice of Language Assistance</b>	<b>How TriMet provides notice to LEP persons about the availability of language assistance</b>
2A	Notice of Right To Language Assistance, Outreach Document	To provide notice of right to language assistance, at no cost, on non-vital yet important outreach documents. Examples may include project fact sheets, service planning open house notices, and other open house materials.
2B	Notice of Right to Language Assistance on the System	To identify areas where TriMet can provide notice of “right to language assistance,” at no cost, to LEP persons.
2C	Notice of Civil Rights Complaint Procedures	To provide information in multiple languages about TriMet’s complaint procedure.
<b>3</b>	<b>Monitoring &amp; Updating the LAP</b>	<b>How TriMet monitors, evaluates, and updates the LAP</b>
3A	Language Skills Competency Standards for Interpreters and Translators	To consistently apply competency standards for interpreters and translators.
3B	Primary Research	To obtain feedback from Spanish-speaking persons on travel behaviors and patterns, fare payment, and demographics. Additional languages that meet the “safe harbor” threshold are accounted for to assess the ability to speak English.
3C	LAP Monitoring & Compliance	To monitor the effectiveness of TriMet’s Language Access Plan on an ongoing basis.
<b>4</b>	<b>Training Programs for Personnel</b>	<b>How TriMet trains employees to provide timely and reasonable language assistance to LEP populations.</b>
4A	Curriculum Development	To ensure that TriMet employees know their obligations to provide meaningful access to information and services for LEP persons.
4B	Incorporate LAP Information Into Employee Environment	To establish a procedure to incorporate LEP Plan information into the employee environment.

## 1A: Use on In-person Interpreter Services at Public Meetings

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

### **PURPOSE**

To provide, at no cost, in-person professional interpreter services upon request for public meetings, and important events.

### **PRACTICE**

Public meetings are an opportunity for the public to learn about, and at designated times, participate in the agency's decision-making process. Subject to application of the Four Factor Analysis, the agency will take reasonable steps to provide Limited English Proficiency (LEP) community members with the opportunity to participate in agency decisions in accordance with established agency procedures. These steps will include:

1. Provide notification that interpretive services are available for meetings on all promotional material; and
2. Provide such services when request is made 48 hours in advance of the meeting.
3. When possible, arrange phone translation at meetings when LEP needs are presented without prior notification less than 48 hours in advance.

### **RESPONSIBILITY**

General Manager's Office, Legal Services, Community Affairs, Transportation Planning, and Communications & Marketing

### **APPROACH**

In the future as in the past, this practice is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

#### **Call-In Requests**

All Outreach and Customer Service staff will be trained on how to use telephone interpretation services and other language assistance resources.

As determined after application of the Four Factor Analysis, when publicizing public meetings, the agency should provide the following information in the key languages:

“To request interpreter services for TriMet meetings, please call 503-238-7433 48 hours in advance of this meeting.”

Staff will immediately submit the request to the coordinating department, who will hire the appropriate interpreter for the meeting.

Prior to utilizing an interpreter:

1. The presenters should schedule a 15 minute briefing with the interpreter. This gives TriMet staff a chance to train the interpreter on specific terminology, procedure, and themes presented.
2. The presenters will discuss the presentation and check for any culturally relevant information as well as receive training on how to communicate effectively through an interpreter, ensuring successful use of the service.

### **Drop-Ins**

To better assist LEP community members who come to public meetings and **have not requested an interpreter in advance**:

1. Staff should provide the guest with the LEP handbill developed by the TEICA division – provided in identified languages –that outlines procedures for receiving information in another language (verbal or written).
2. The handbill also will provide information on how to request interpreter services and how they can testify at public meetings.
3. Staff should prominently display the following sign at registration in the key languages:

***“To access information from this meeting, please call (503) 238-7433.”***

**Targeted Public Meetings:** When TriMet is hosting public meetings in a particular geographic area with a known, significant LEP population:

1. Meeting notices should be produced and distributed in the key language(s) encouraging area residents to: a) participate; and b) request interpreter services 48 hours in advance of the meeting.
2. TriMet will provide at least one qualified interpreter at these meetings who is fluent in the designated language(s).
4. The agency will prioritize the use of bilingual facilitators instead of using interpreters, when possible in informal settings. The use of family members or friends to act as interpreters when a qualified interpreter is unavailable is strongly discouraged.

## 1B: Written Translation of Vital Documents

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

### **PURPOSE**

To implement a procedure to provide for written translation of vital documents.

### **PRACTICE**

The agency will take reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to TriMet programs and services, with respect to identification and written translation of vital documents, as outlined in this Guidance.

### **RESPONSIBILITY**

Marketing, Community Affairs, Customer Experience and Legal Services

### **APPROACH**

This Guideline assumes that to be truly useful, translated materials must communicate clearly and in a culturally appropriate way with the audience. The documents must – to the greatest extent possible – preserve accuracy in meaning, and not be overly-burdened by legalistic terms and technical vocabulary.

In the future as in the past, the determination as to whether to provide a written translation of a vital document is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

Whether or not a document is deemed to be “vital” may depend on the importance of the program, information, encounter or service involved, and the consequence to the LEP person if the information is not accurate or timely. A “vital document” may include information which is critical or required to participate in or benefit from an agency program or activity. For instance, applications for bicycle parking should not generally be considered vital, whereas access to application forms to qualify for accessible transit services like LIFT could be considered vital.

Classifying a document as vital or non-vital is sometimes difficult, especially in the case of outreach materials like brochures or other information on rights and services. Awareness of rights or services is an important part of “meaningful access,” as lack of awareness may effectively deny LEP individuals meaningful access. Where the agency is engaged in community outreach efforts in furtherance of its programs and activities, the needs of

populations frequently encountered or affected by the program or activity should be regularly assessed to determine whether certain critical outreach materials should be translated.

## **PROCEDURE**

All requests for written translations of vital documents shall be submitted to The Multicultural Programs Manager for handling in accordance with the above Guideline. The Multicultural Programs Manager will chair a standing LAP Program Team. This committee will meet quarterly and be comprised of representatives from Capital Projects, Creative Services, Customer Service Customer Information, Operations, and Legal Services to identify agency vital documents and assess LEP written translation services under this Guideline.

Once a determination is made to translate and in what language(s), the requesting party will:

1. Submit request to Creative Services to have the information translated, designed and printed and/or posted to trimet.org.
2. Submit work product and Creative Service Request form to LAP Program Team.
3. LAP Program Team will review submissions quarterly to ensure quality and standards are met, and to provide feedback on any part of the publication process when applicable.

## 1C: Customer Information Channels

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

### **PURPOSE**

To provide information about TriMet services in multiple languages using the Four Factor Analysis to determine need.

### **PRACTICE**

TriMet's customer information will be made available to Limited English Proficiency (LEP) customers through the most effective communication channels per Title VI, Prohibition Against National Origin Discrimination Affecting LEP Persons. In order to avoid discrimination on the grounds of national origin, the agency will take reasonable steps to ensure that LEP customers receive information in the language necessary to allow them meaningful access to programs and services, free of charge.

### **RESPONSIBILITY**

Marketing and Customer Service

### **APPROACH**

In the future as in the past, the determination of the most meaningful and effective communication channel is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

The Project Manager, in concert with the Multicultural Programs Manager, will make the final determination of what customer information will be translated based on the Four Factor Analysis and recommendation of LAP Program Team. Translations should be considered for these basic customer information materials:

1. Fares and How to Ride brochure including information about how to ride the system (bus, light rail, commuter rail and streetcar), fares, and basic riding rules.
2. Major service change Service Alerts.
3. Audio scripts for 238-7433 menu selection to help limited English customers in receiving needed customer service.
4. Audio scripts for ticket vending machines (TVM) to assist LEP customers in purchasing tickets and passes.

## **INFORMATION CHANNELS**

The following information channels will be considered when determining which messages are to be prepared for LEP customers:

- Service alerts
- Print media-public notice and display ads
- Out-of-home media-transit ads, bus benches and shelters, bill boards
- Broadcast media-radio and TV
- Electronic media - website, social media, email, blogs, smart phone apps, etc.
- On street displays/posters
- In-person customer outreach
- Digital displays at MAX platforms and partner locations

## 1D: Culturally-Responsive Outreach

Proposed: 4/28/09

Adopted: 12/1/10

Updated: 2019

### **PURPOSE**

Develop and implement culturally-responsive outreach to increase awareness of, and access to, TriMet services and programs.

### **PRACTICE**

Determine language needs of target audience to develop appropriate communication tools, approach and message.

### **RESPONSIBILITY**

Multicultural Programs Manager, Marketing Department, PIOs, TEICA

### **APPROACH**

The determination of the most meaningful, culturally-responsive outreach measures will be guided by the outcome of the Four Factor Analysis whereby there will be a review of:

1. The number and proportion of eligible Limited English Proficiency (LEP) constituents;
2. The frequency of LEP individuals' contacts with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

1. Develop culturally appropriate materials in the target language.
  - a. Print materials
  - b. Websites and/or webpages
  - c. Video and Audio
2. Test materials with key constituencies.
  - a. Utilize methods such as focus groups or peer review to test materials before going to production.
  - b. Use TriMet Staff and Community Partners in TEAC when other more comprehensive review and feedback processes are not possible.
  - c. Periodically host a focus group to review translated materials.
3. Establish relationships and partner with key community leaders and organizations of target audience.
4. Individual one on one meetings, telephone calls, and e-mail messages to target leadership.
5. Visit/participate in scheduled community events of target audience to promote message.



6. Target outreach to key gathering places such as churches, schools, community colleges, libraries, and social service and community activist organizations.
7. Promote message with community media—create earned media opportunities.
8. Use TriMet vehicles and properties to display message in target language on lines that run through areas with a high percent of residents who speak that language.
9. Develop print, radio, social media, and television ads in target language.
10. Use TriMet personnel that reflect target audience to promote message.
11. Work with culturally specific contractors to engage LEP communities.

## 2A: Notice of Right to Language Assistance, Outreach Documents

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

### **PURPOSE**

To provide notice of right-to-language assistance, at no cost, on outreach documents. Examples may include project fact sheets, webpages, service planning open house notices, and other open house materials.

### **PRACTICE**

TriMet produces hundreds of documents that may be of interest to Limited English Proficiency (LEP) community members. Documents should include a notice in all LEP population languages identified in the Four Factor Analysis alerting customers that the document is available to be translated upon request in accordance with this Guideline. TriMet will develop a collection of standardized language assistance notices on TriNet for use when creating new outreach materials and communications.

### **RESPONSIBILITY**

Marketing & Outreach Services, Community Affairs, and Communications

### **APPROACH**

In the future as in the past, this practice is guided by the outcome of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

1. The Project Manager, working with the Multicultural Programs Manager, will make the final determination if a document warrants including the Language Assistance notification.
2. Documents should include a box with following information translated into languages identified in the Four Factor Analysis – *“For Language Assistance call 503-238-7433.”*
3. Document name, date, and language code (if applicable) will be noted in the footer of the last page to aid the Customer Service Department in efficiently identifying the document.

4. When the LEP customer calls Customer Service, staff will work with the caller and (when necessary) on-call interpreters to determine whether a verbal or a written response is desired.
5. Customer Service staff will then submit the request to appropriate department for processing.
6. If translation is required, every effort will be made to provide a translated document within 10 working days of the request.

**Example of format for Language Assistance notice in the identified Languages:**

Spanish: Si necesita interprete, llame al 503-238-7433

Vietnamese: Nếu cần trợ giúp về thông dịch xin gọi 503-238-7433

Chinese (simplified): 如需语言帮助请致电 : 503-238-7433

Russian: Для службы языковой поддержки 503-238-7433

Korean: 언어 통역이 필요하시면, 503-238-7433 으로 전화 하시면 됩니다

## 2B: Notice of Right to Language Assistance on the System

Proposed: 3/10/2009

Adopted: 12/1/10

Updated: 2019

### **PURPOSE**

Identify areas where TriMet can provide notice of “right to language assistance,” at no cost, to Limited English Proficiency (LEP) persons.

### **PRACTICE**

Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons: In order to avoid discrimination on the grounds of national origin, the agency will take reasonable steps to ensure that LEP customers receive the language assistance necessary to allow them meaningful access to programs and services, free of charge.

### **RESPONSIBILITY**

Marketing & Outreach Services and Customer Experience

### **APPROACH**

In the future as in the past, this practice is guided by the outcome of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

The agency will ensure that a translated notice of the right to language assistance is posted in an easily visible location at all relevant venues.

Based on the Four Factor Analysis and LAP Program Team recommendations, examples of LEP notification points to consider include venues likely to be patronized by a high volume of LEP customers looking for TriMet information:

1. TriMet customer service offices and ticket outlets
2. Signs and handouts available in vehicles and stations
3. Outreach documents
4. Agency website
5. Postings at Community-Based Organizations (CBOs) partnering with the agency made available to partners via [trimet.org/dc](http://trimet.org/dc)
6. Notices in non-English community newspapers

7. Announcements on non-English radio stations
8. Information tables at local events

## 2C: Notice of Civil Rights Complaint Procedures

Proposed: 3/10/2009

Adopted: 2011

Updated: 2019

### **PURPOSE**

Provide information in multiple languages about TriMet's complaint process.

### **PRACTICE**

TriMet's complaint process will be made available to Limited English Proficiency (w) constituents upon request and in key public locations per Title VI.

### **RESPONSIBILITY**

Marketing; Customer Experience; Legal Services; Transit Equity, Inclusion, and Community Affairs

### **APPROACH**

In the future as in the past, the determination as to Title VI notice locations and specific messaging formats is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

Based on the LAP Program Team recommendations and the outcome of the Four Factor Analysis the following locations were identified as the best places to post information about TriMet's complaint process for LEP persons:

1. TriMet's external website in the language of key LEP communities.
2. The TriMet Ticket Office (TTO) in downtown Portland, Oregon, where significant numbers of LEP persons seek TriMet information.
3. Onboard notification on transportation vehicles and transit centers.
4. TriMet Lost and Found
5. TriMet Administrative Offices
6. IDP managed locations

### 3A: Language Skills Competency Standards for Interpreters and Translators

Proposed: 3/10/2009

Adopted: 12/1/10

Updated: 2019

#### **PURPOSE**

Consistently apply competency standards for interpreters and translators.

#### **PRACTICE**

Interpretation and translations arranged by TriMet will be performed by contracted vendors and/or individuals whose competency has been established based on contract awards through a request for proposal (RFP) process. .

#### **RESPONSIBILITY**

Members of the Source Evaluation Committee (SEC), Members were selected from the following departments: Marketing, Customer Services, ATP, Community Affairs, and Planning and Policies

#### **APPROACH**

This task will be accomplished using a combination of methods to provide reliability, flexibility, and cost savings:

1. Work with qualified and certified professional organizations offering services in the fields of interpreting and translation.
2. Utilize bilingual TriMet staff members to check the quality of work produced, when possible.
3. Evaluate and apply key elements from successful programs from state and local governments and healthcare providers.
4. When possible, use local translators and ask that the same individuals be assigned to our projects each time in order to build the contextual knowledge needed to accurately translate our materials.
5. Incorporate language into contracts requiring vendors to certify their proficiency in target languages.

#### **PROCEDURE**

1. Work with the contractors to ensure that all interpreters and translators working for TriMet meet the following standards:
  - a. Communicate fluently – verbally and in writing – in both English and the primary language of the Limited English Proficiency (LEP) individual.

- b. Demonstrate cultural understanding of the LEP customer served.
  - c. Accurately and impartially interpret and/or translate to and from such languages and English.
  - d. Demonstrate an understanding of the role and the ethics associated with being an interpreter or translator.
2. TriMet will conduct “spot checks” on translations and for limited interpreting services, bilingual TriMet staff may provide assistance.
  3. In the event that translation or interpretation services are not up to competency standards TriMet staff will:
    - a. Notify the vendor of their error and give a reasonable opportunity to fix the error.
    - b. Document the error.
    - c. If more than 2 errors are made for a given language then TriMet Staff will move to a secondary contractor.



### 3B: Primary Research

Proposed: 11/16/18

Updated: 2019

#### **PURPOSE**

To obtain feedback from Limited English Proficiency (LEP) riders on travel behaviors and patterns, fare payment, and demographics. When possible questions will ask about other languages spoken at home. For some projects additional languages that meet the “safe harbor” threshold identified by the Four Factor Analysis will be accounted for to assess the ability to speak and/or read English.

#### **PRACTICE**

TriMet will determine when changes in demographics, types of services, or other needs, warrant changes to the Language Access Plan (LAP) or communication strategies.

#### **RESPONSIBILITY**

Research & Analysis, On-Board Survey Team

#### **APPROACH**

This practice will be carried out as part of the TriMet survey research program.

#### **PROCEDURE**

On-board surveys will be in tablet format in English and Spanish with safe harbor languages asked about English comprehension.

1. Add language question to research surveys conducted in a language other than English. Using wording from the U.S. Census Bureau, determine LEP status of those responding to TriMet surveys. Consistent with standard LEP survey practices, anyone answering either question *not well* or *not at all* is considered LEP.
  - Q1. How well do you speak English? Very well, well, not well, not at all
  - Q2. How well do you read English? Very well, well, not well, not at all
2. Add language preference question to research surveys conducted in English.
  - a. Is there a language other than English that you would prefer to take this survey in?

Telephone/mail/panel/surveys will be conducted in English and Spanish. In some surveys respondents will be asked about other languages spoken at home, if English is not their first language. They may also be asked how well they speak/read English.

Focus groups/intercept surveys/1-on-1 interviews/on-line surveys will be conducted in whatever languages are required to meet project plan purposes.

Results of research will be published on TriNet and on TriMet research page.

### 3C: Language Access Plan Monitoring and Compliance

Proposed: 11/16/2018

Updated: 2019

#### **PURPOSE**

Develop a process to monitor the effectiveness of TriMet's Language Access Plan (LAP) on an ongoing basis. Ensure compliance with Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, and Executive Order 13166.

#### **PRACTICE**

TriMet will determine when changes in demographics, types of services, or other needs, warrant changes to the LAP. Updates to the LAP are reserved for FTA guidance memorandums or policy.

#### **RESPONSIBILITY**

Transit Equity, Inclusion, and Community Affairs; Research & Analysis; GIS & Location Based Services; Outreach Services, Multicultural Programs.

#### **APPROACH**

This approach will use a combination of qualitative and quantitative approaches to determine if the LAP is meeting the needs of the Limited English Proficiency (LEP) community. The use of federal and state regulations and policy will determine compliance. Results of the reviews will be posted on TriNet.org.

#### **PROCEDURE**

Regular LAP reviews will be conducted to make sure the LAP continues to include reasonable steps to ensure meaningful access to TriMet's programs and services for LEP communities. Monitoring the LAP program will take two forms:

1. **Ongoing Review:** This is an ongoing process conducted internally and externally throughout the year. Feedback solicited and received from: TriMet staff (front line and management/administration), LEP customers, and Community-Based Organizations (CBOs) serving the LEP populations. In this way, any **critical issues can be immediately addressed** and changes made to the Language Access Plan as needed.
  - a. Internal: Transit Equity, Inclusion, and Community Affairs staff will meet with TriMet colleagues quarterly to evaluate the quantity and quality of LEP activities encountered between TriMet staff and LEP customers. Staff will be asked to evaluate the effectiveness of LAP communication methods, materials, and messaging. Secret shoppers may be utilized to test our effectiveness at providing language assistance for different programs and services. Suggestions for improvements will be requested and acted upon as appropriate.

- i. **Front Line Surveys:** This will be a quantitative survey conducted among front-line staff to track any changes in quantity and quality of LEP customer encounters. Survey questions will include: awareness and use of TriMet's language assistance services; frequency of LEP customer encounters, how they communicate with LEP passengers; what the agency could do to help them.
    - b. **External:** Meet with LEP customers and CBO representatives to find out how well elements of the LAP communications are working. This part of the review will rely on the CBOs and Faith Based Organizations serving LEP populations.
  2. **Triennial Review:** The Language Access Plan will be reviewed on annual basis. Included in the review would be the results of any changes in demographics, types of services, or other needs. The annual review includes:
    - a. A Four Factor Analysis: to gather internal and external program data, analyze results, and report on the status of the program in light of updated information.
    - b. Community Consultations: Conducted with members of the LEP communities to determine how well the agency is working for them and to track any changes due to implementation of the LAP actions. The consultations will focus on:
      - i. Awareness of and use of TriMet's language assistance services
      - ii. Experiences with TriMet's fares/tickets, routes/schedules, and safety/security issues
      - iii. Understanding and evaluation of customer information materials – visual, auditory, and written
      - iv. Suggestions to make riding TriMet easier

The frequency of re-evaluation of the LAP will be based on agency staff review of whether "demographics, services, and needs" remain constant.

## 4A: Curriculum Development

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

### **PURPOSE**

The purpose of the training program is to ensure that TriMet employees know their obligations to provide *meaningful access* to information and services for LEP (Limited English Proficiency) persons.

### **RESPONSIBILITY**

Operations Training – Bus Training Supervisors, Rail Training Supervisor; Manager, Fare Enforcement Administration, Maintenance Training Supervisors, Field Operations Training Supervisors; Dir, Safety Management Sys & Environmental Svcs.; Manager, Security and Emergency Management; Executive Director of Public Affairs; Multicultural Programs Manager; Program Manager, Learning and Development; Recruitment Supervisor; Chief Station Agent.

### **APPROACH**

The approach taken with the training element of the Language Access Plan (LAP) may employ a combination of written materials, PowerPoint slide presentation, eLearning, and in-person question and answer sessions. Trainings are designed to give presenters the flexibility necessary to meet the informational needs unique to each workgroup. While the means of delivering information may vary from audience to audience, the core messages remain consistent throughout. Workgroups identified for training fall into these general categories:

1. Front line employees: Operators, Trainers, Customer Service Representatives, Public Affairs Representatives, Lost and Found, Maintenance
2. Finance & Administration Services
3. Management (all levels)
4. Support staff (Administrative staff)
5. Field Operations
6. Ride Guide & Ask Me Staff
7. Security and Fare Enforcement

The Training Subcommittee has developed LAP training curriculum, and works to maintain a LAP training curriculum, with guidance from the LAP Program Team. The LAP training for front line employees and other TriMet staff focuses on the many elements of the LAP program including:

- Summary of the agency's responsibilities under the DOT LEP Guidance

- LEP populations in the TriMet service district
- Summary of TriMet's LAP
- Summary of the Four Factor Analysis
- Description of the language services available to LEP customers and staff
- How staff and LEP customers can access these services
- How to work effectively with interpreters in-person and over the telephone
- How to communicate with LEP persons face-to-face, over the telephone, and in writing
- How to respond to civil rights complaints

## 4B: Incorporate LAP Information in Employee Environment

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

### PURPOSE

Establish a procedure to incorporate Language Access Plan (LAP) information into the employee environment.

### RESPONSIBILITY

Operations Training, Director/Marketing, Multicultural Programs Manager, Director/Talent Management.

### APPROACH

The approach taken with this element of the training program is to identify the various means of delivering information to TriMet employees. The most effective communication channels identified are varied in form: in-person training, employee meetings, written materials, and electronic delivery systems.

- Training sessions:
  - New Employee Orientation
  - Operator Training Program and Recertification
  - Field Operations Training Program
  - Management and professional development training and events such as “Lunch and Learns” and the “E3 Program”
- Meetings:
  - Division meetings
  - Administrative staff departmental meetings
  - Expanded Directors’ Exchange
  - Executive Team meetings
  - Quarterly Town Hall meetings
  - Employee Resource Group
- Written materials:
  - TriMet Employee Handbook
  - Employee posters or fliers for bulletin boards
  - Operator notices
- Electronic media:
  - TriMet’s internal website – **TriNET**
  - Employee weekly e-newsletter – **Expressline**
  - TV monitors in breakrooms
  - All employee emails

## **PROCEDURE**

The procedure to incorporate the LAP information into new employee orientation, employee handbook, and TriNET will conform to existing procedures used to provide employee required information.

**Exhibit 2: Four Factor Analysis**





# Four Factor Analysis

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2019 Update

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Appendix C: Bus Operator and Field Operations Survey Findings

Appendix D: Bus Operator Survey Instrument

Appendix E: Road and Rail Supervisor Survey Instrument

## Introduction

TriMet strives to provide meaningful access to programs and services for all community members, including those with limited English proficiency (LEP). Beyond compliance with relevant guidelines and regulations, this supports TriMet’s vision, mission, and values:

### **Vision**

*TriMet will be the leader in delivering safe, convenient, sustainable and integrated mobility options necessary for our region to be recognized as one of the world’s most livable places.*

### **Mission**

*Connect people with valued mobility options that are safe, convenient, reliable, accessible and welcoming for all.*

### **Values**

*Safety · Inclusivity · Equity · Community · Teamwork*

TriMet last performed a Four Factor Analysis examining the language needs and services provided to LEP individuals in 2016. The Portland metropolitan region has seen dramatic population growth and demographic changes since that time, calling for an updated assessment.

## Title VI Regulatory Background

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on persons with limited English proficiency (LEP) because such conduct constitutes national origin discrimination.
2. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

## Department of Transportation LEP Guidance

The U.S. Department of Transportation (DOT) LEP guidance states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” requiring recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

### Four Factor Analysis

As per DOT and FTA guidance, there are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient;
- 2) The frequency with which LEP individuals come in contact with the program;
- 3) The nature and importance of the program, activity or service provided by the recipient to people’s lives; and
- 4) The resources available to the recipient for LEP assistance activities and the associated costs.

A description of the self-assessment undertaken in each of these areas follows.

### Evaluation Methods and Data Sources

In accordance with FTA’s policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Determining the presence of LEP populations in the TriMet service district area was done through an analysis of the following data sources:

- US Census Bureau, 2012-2016 5-year sample, American Community Service data
- Oregon Metro Regional Land Information System (RLIS)
- Oregon Department of Education Student Language of Origin data , 2017-2018
- Oregon Health Authority Public Health Women-Infant-Children program data, 2016-2018
- Oregon Judicial Department court language service request data, 2016-2019
- TriMet Geographic Information System
- Spring 2018 on-board rider survey
- Fall 2018 system-wide fare survey
- Summer 2018 operator survey regarding contact with LEP persons
- Fall 2018 road and rail supervisors survey regarding contact with LEP persons
- Call center language interpretation requests and views of translated webpage [www.trimet.org](http://www.trimet.org)
- 2019 TriMet language services survey

In addition to analyzing data, TriMet staff have become familiar with LEP populations in the TriMet service district by working with community organizations that serve these populations. TriMet regularly works with these organizations when conducting outreach concerning service changes or other matters, such as how to enroll in the Reduced Fare Program. TriMet turns to these organizations for assistance in identifying language translation needs and in planning the best ways to inform and involve people with limited English proficiency. Key organizations include the following:

APANO	African Family Holistic Health Organization
Asian Health and Services Center	Bienestar
Catholic Charities	Centro Cultural
Immigrant & Refugee Community Organization	IRCO Africa House
IRCO Asian Family Center	Hacienda CDC/Baltazar Community Center
Latino Network	Portland ESL Network

## **Factor 1: The number and proportion of LEP persons served or likely to be encountered by a TriMet program, activity or service**

### **2012 - 2016 American Community Survey 5-Year Sample**

The US Census Bureau collects data about the ability to speak English as well as the language spoken at home via the American Community Survey (ACS) and allows for the identification of LEP languages falling within the “Safe Harbor” thresholds. The thresholds are 5% of total population or 1,000 individuals, whichever is less. This data was retrieved for the TriMet district, which includes most of Clackamas, Multnomah, and Washington Counties.

For the initial piece of the Factor 1 Analysis, TriMet analyzed 2012-2016 5-year Census ACS data to identify LEP populations within the TriMet service district as well as those populations’ access to TriMet bus and rail service. The LEP population is defined as those who reported to the Census Bureau that they speak English “less than very well.”

DOT “safe harbor” guidance calls for written translations of vital documents for each language group that constitutes at least 5% or 1,000 LEP individuals, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered (i.e. the TriMet service area). Translations of other documents, if needed, can be provided orally. For TriMet’s purposes this means that the “safe harbor” threshold is 1,000 persons because this is much less than 5% of the population.

Failure to provide written translations under the safe harbor criteria does not mean there is non-compliance with LEP access requirements, but adherence to the safe harbor criteria will serve as strong evidence of compliance.

***Population Figures.*** As shown in Table 1 on the next page, LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. The largest proportion consists of Spanish speaking LEP individuals (3.8% of the total population and 46% of the LEP population), followed by Vietnamese (0.9% of the total population and 11% of the LEP population). Eleven other languages meet the Safe Harbor threshold of 1,000 LEP individuals according to the ACS.

**Table 1: Languages spoken by LEP persons age 5 and older in TriMet district**

Languages Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	56,605	3.8%	46.1%
Vietnamese	13,598	0.9%	11.1%
Chinese (Cantonese, Mandarin)	9,892	0.7%	8.1%
Russian	6,656	0.5%	5.4%
Korean	3,259	0.2%	2.7%
Ukrainian	2,948	0.2%	2.4%
Arabic	2,336	0.2%	1.9%
Tagalog	2,095	0.1%	1.7%
Japanese	1,867	0.1%	1.5%
Mon-Khmer, Cambodian	1,658	0.1%	1.3%
Persian/Farsi	1,159	0.1%	0.9%
Other (e.g., Romanian and Somali)	20,799	0.1%	16.9%
<b>Total</b>	<b>122,872</b>	<b>8.3%</b>	

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2012 - 2016 (5-Year Estimates).

**LEP Maps.** The ACS data was also plotted on a series of maps and overlaid with TriMet’s bus and rail service, provided on the following twelve pages:

- Figure 1: LEP populations greater than the region average of 8.3%.
- Figure 2: Distribution of concentrations of Spanish-speaking LEP populations
- Figure 3: Distribution of concentrations of Vietnamese-speaking LEP populations
- Figure 4: Distribution of concentrations of Chinese-speaking LEP populations
- Figure 5: Distribution of concentrations of Russian-speaking LEP populations
- Figure 6: Distribution of concentrations of Korean-speaking LEP populations
- Figure 7: Distribution of concentrations of Ukrainian-speaking LEP populations
- Figure 8: Distribution of concentrations of Arabic-speaking LEP populations
- Figure 9: Distribution of concentrations of Tagalog-speaking LEP populations
- Figure 10: Distribution of concentrations of Japanese-speaking LEP populations
- Figure 11: Distribution of concentrations of Mon-Khmer-speaking LEP populations
- Figure 12: Distribution of concentrations of Persian-speaking LEP populations
- Figure 13: Distribution of concentrations of Indo-European-speaking LEP populations

# Limited English Proficient Population Distribution

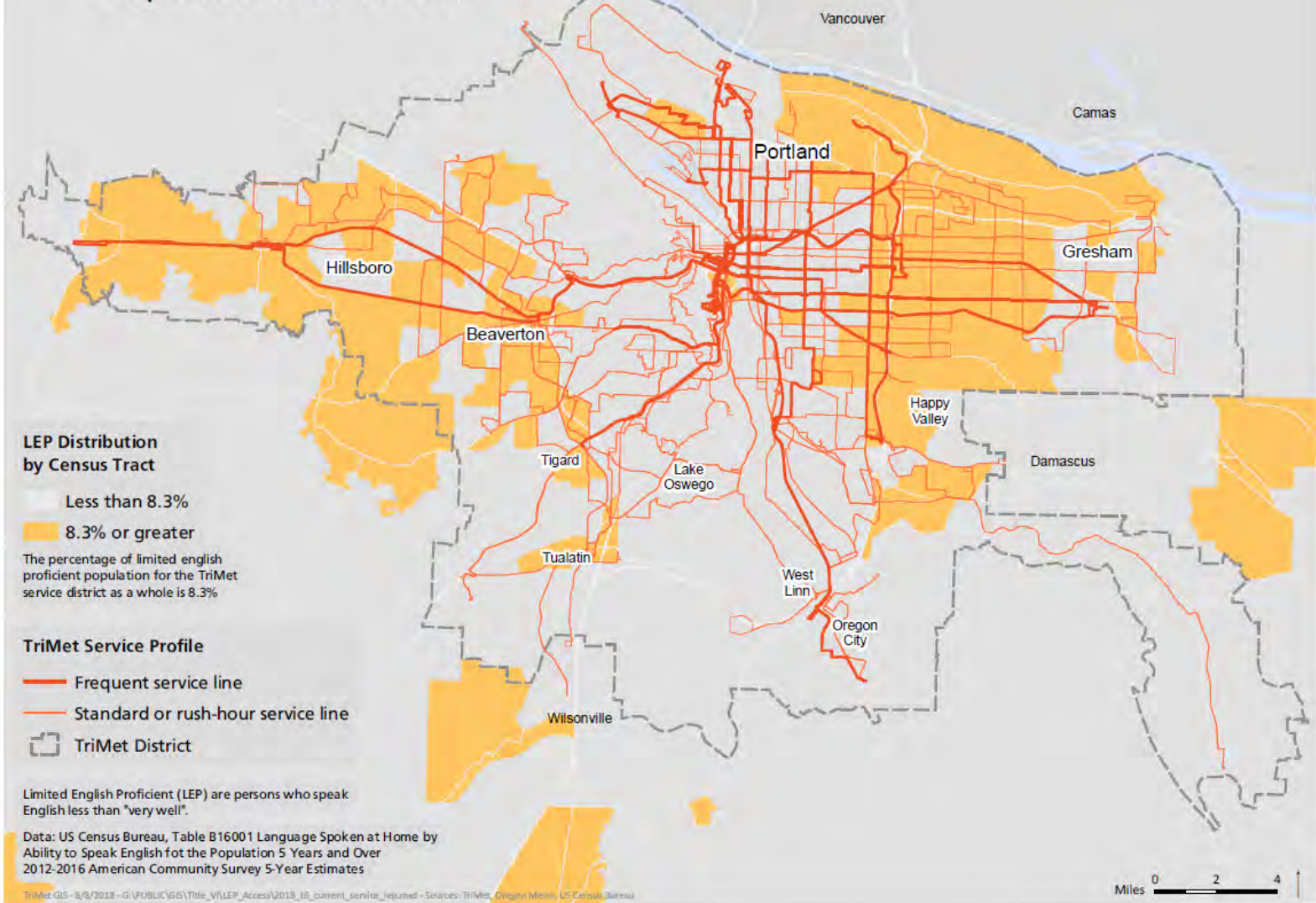


FIGURE 1: LEP POPULATION AND TRIMET DISTRICT



# Limited English Proficient Spanish-speaking population distribution

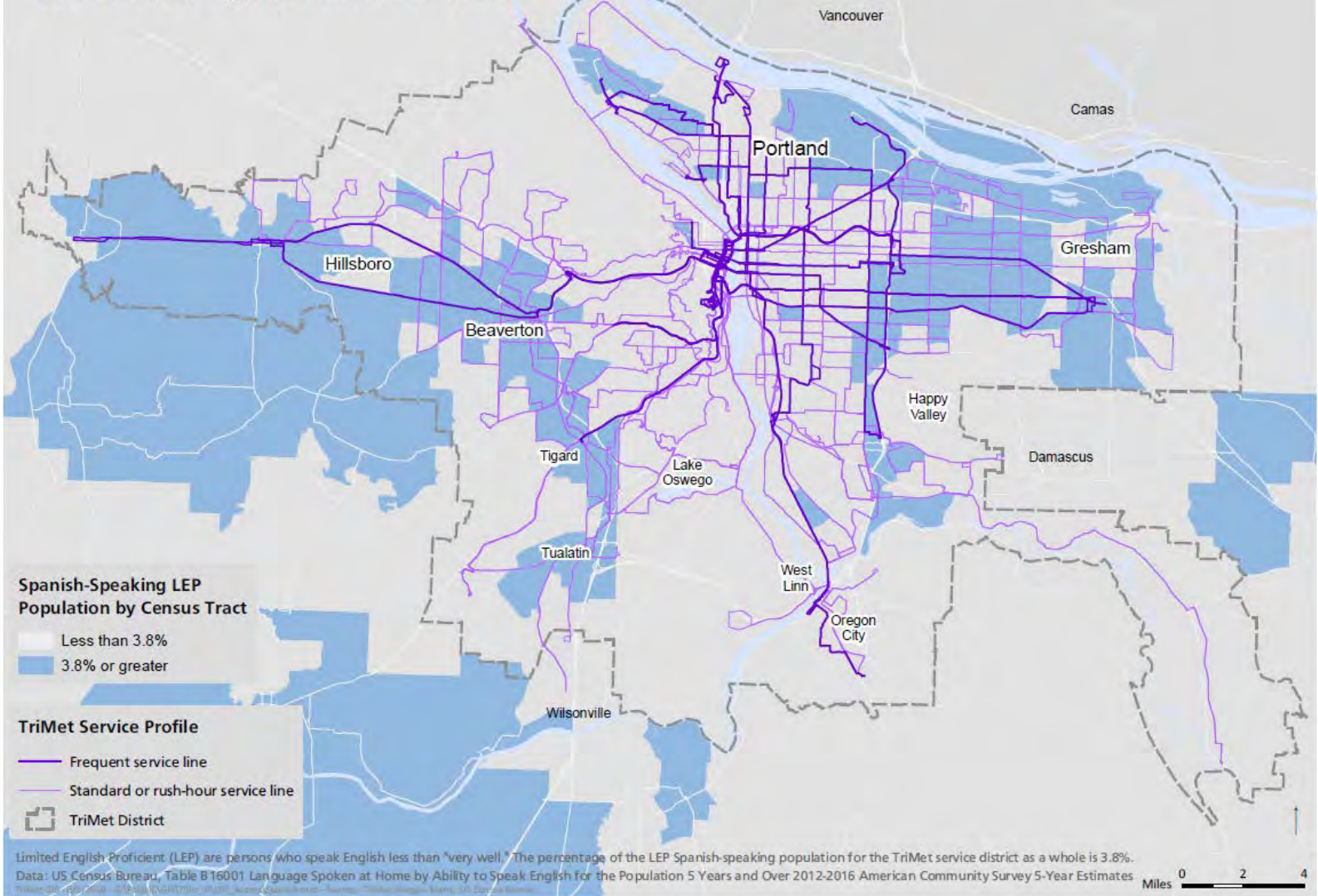


FIGURE 2: SPANISH-SPEAKING LEP POPULATION AND TRIMET DISTRICT

# Limited English Proficient Vietnamese-speaking population distribution

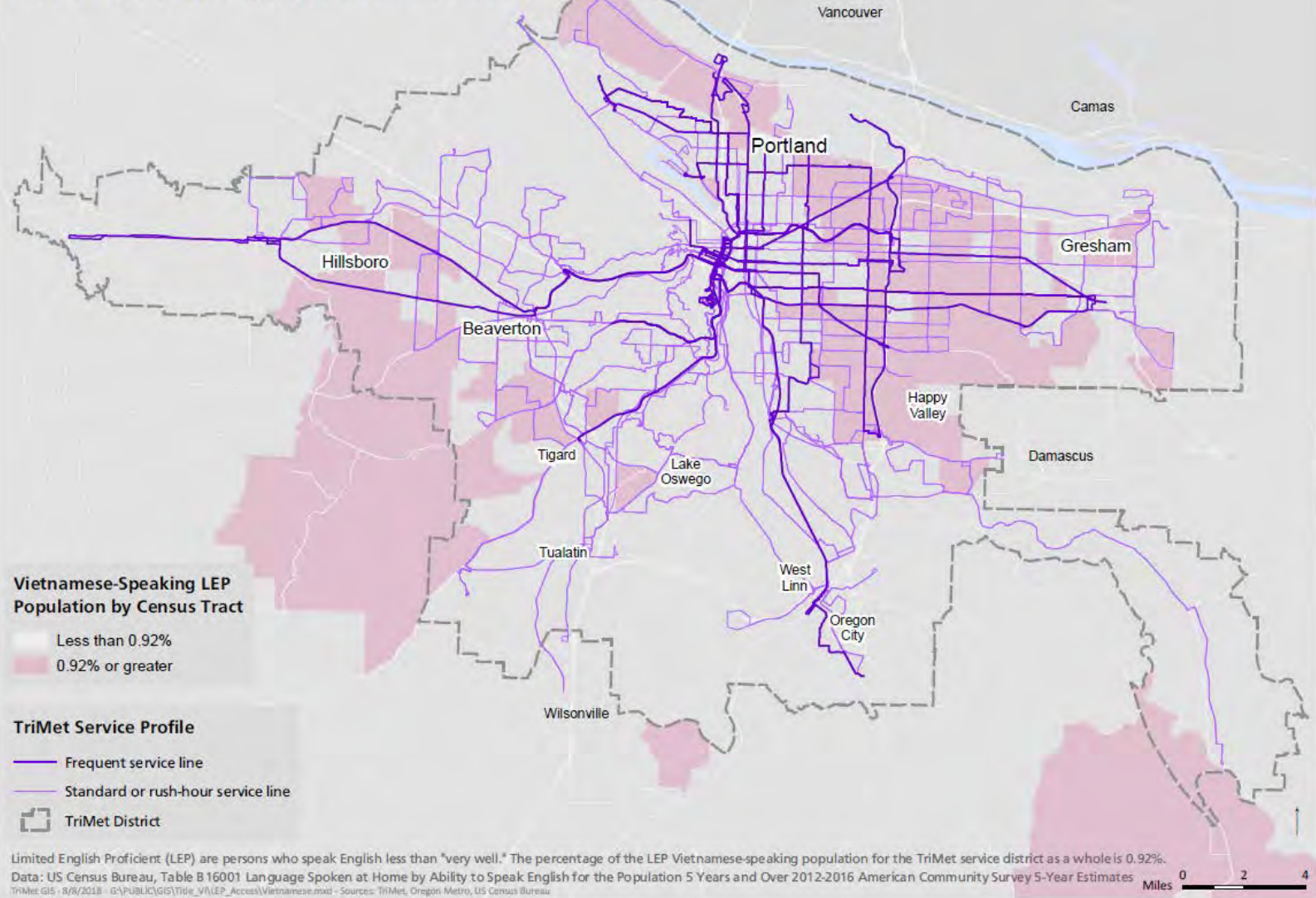


FIGURE 3: VIETNAMESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

# Limited English Proficient Chinese-speaking population distribution

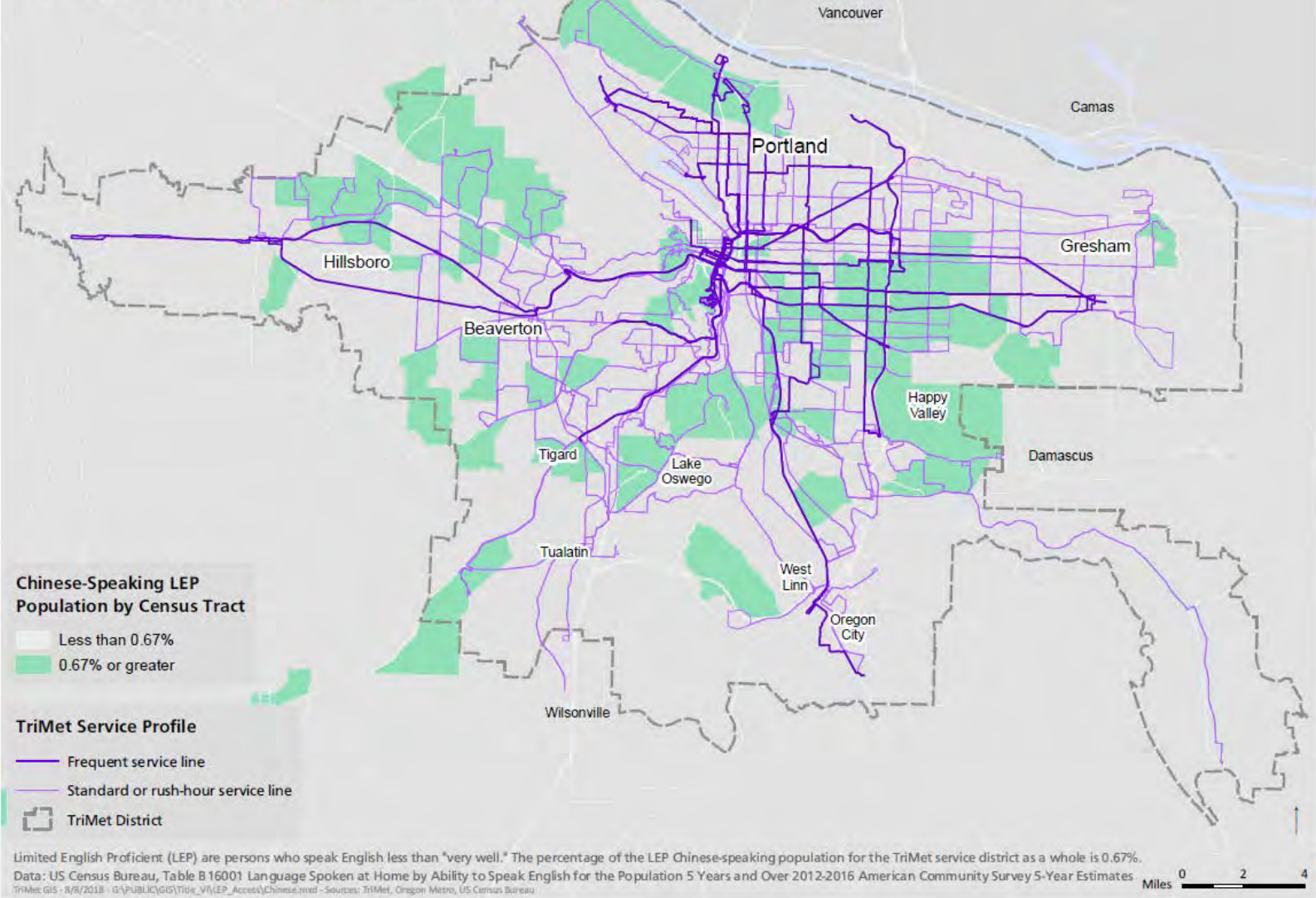


FIGURE 4: CHINESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

# Limited English Proficient

## Russian-speaking population distribution

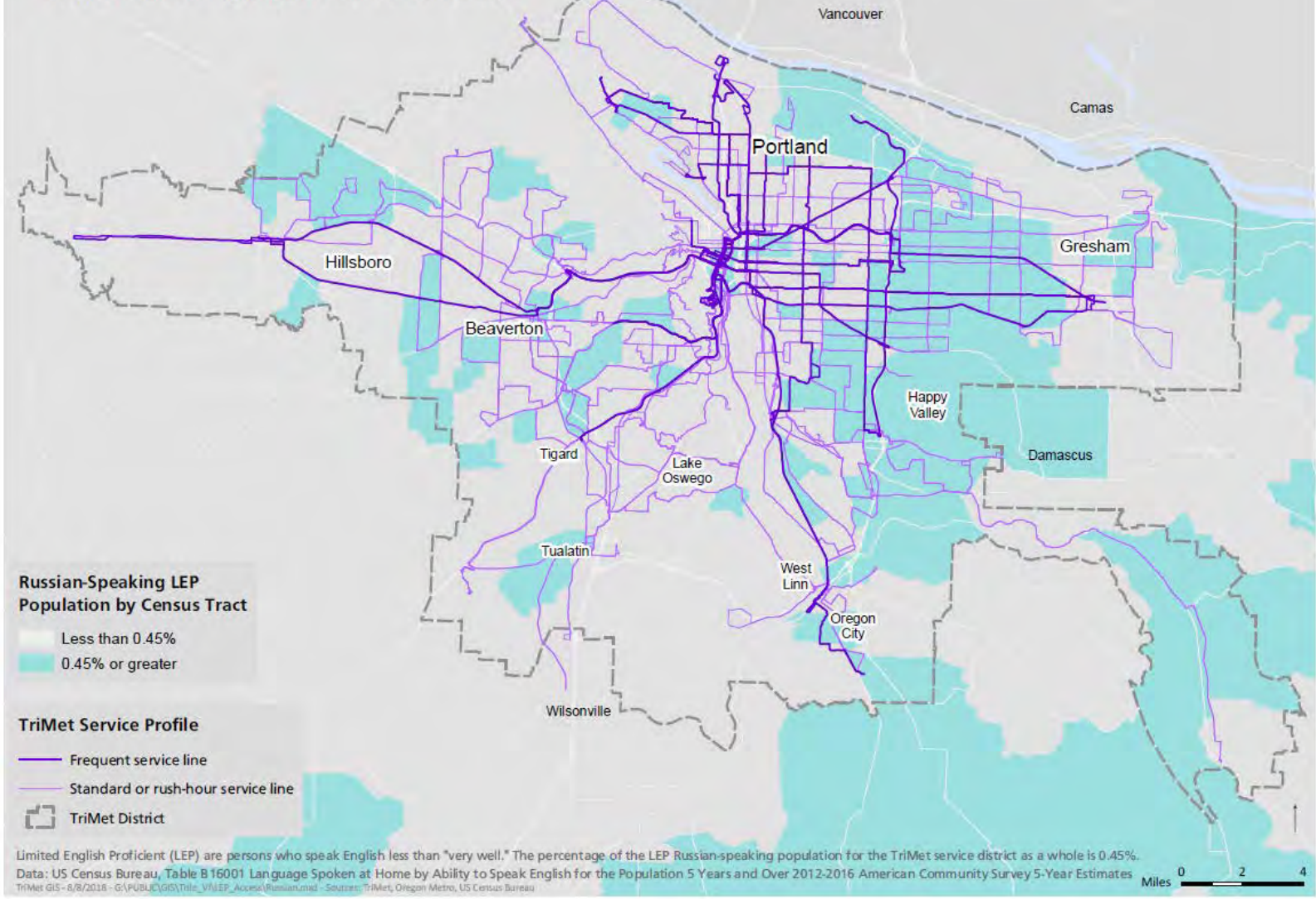


FIGURE 5: RUSSIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

# Limited English Proficient

Korean-speaking population distribution

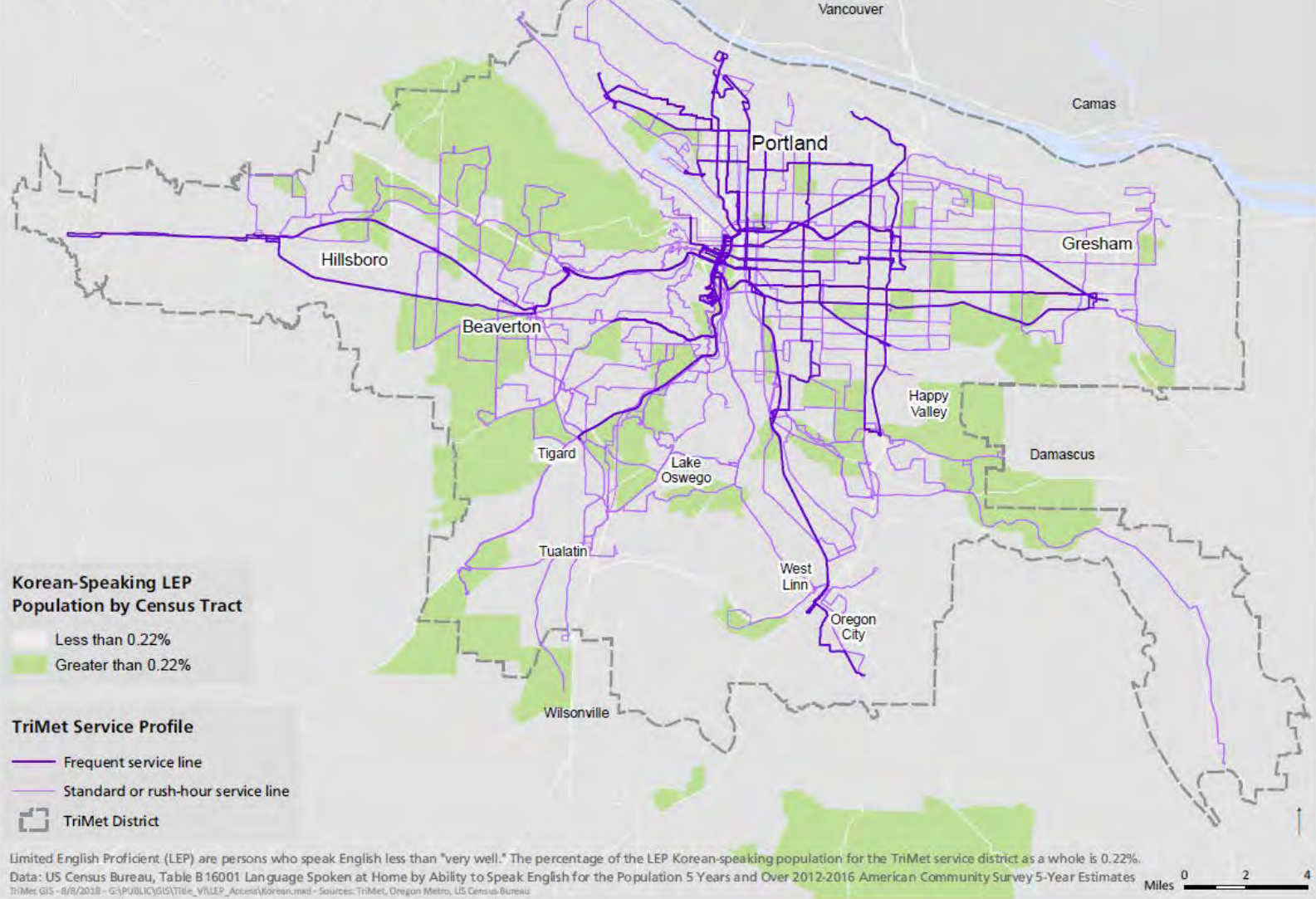


FIGURE 6: KOREAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

# Limited English Proficient

Ukrainian-speaking population distribution

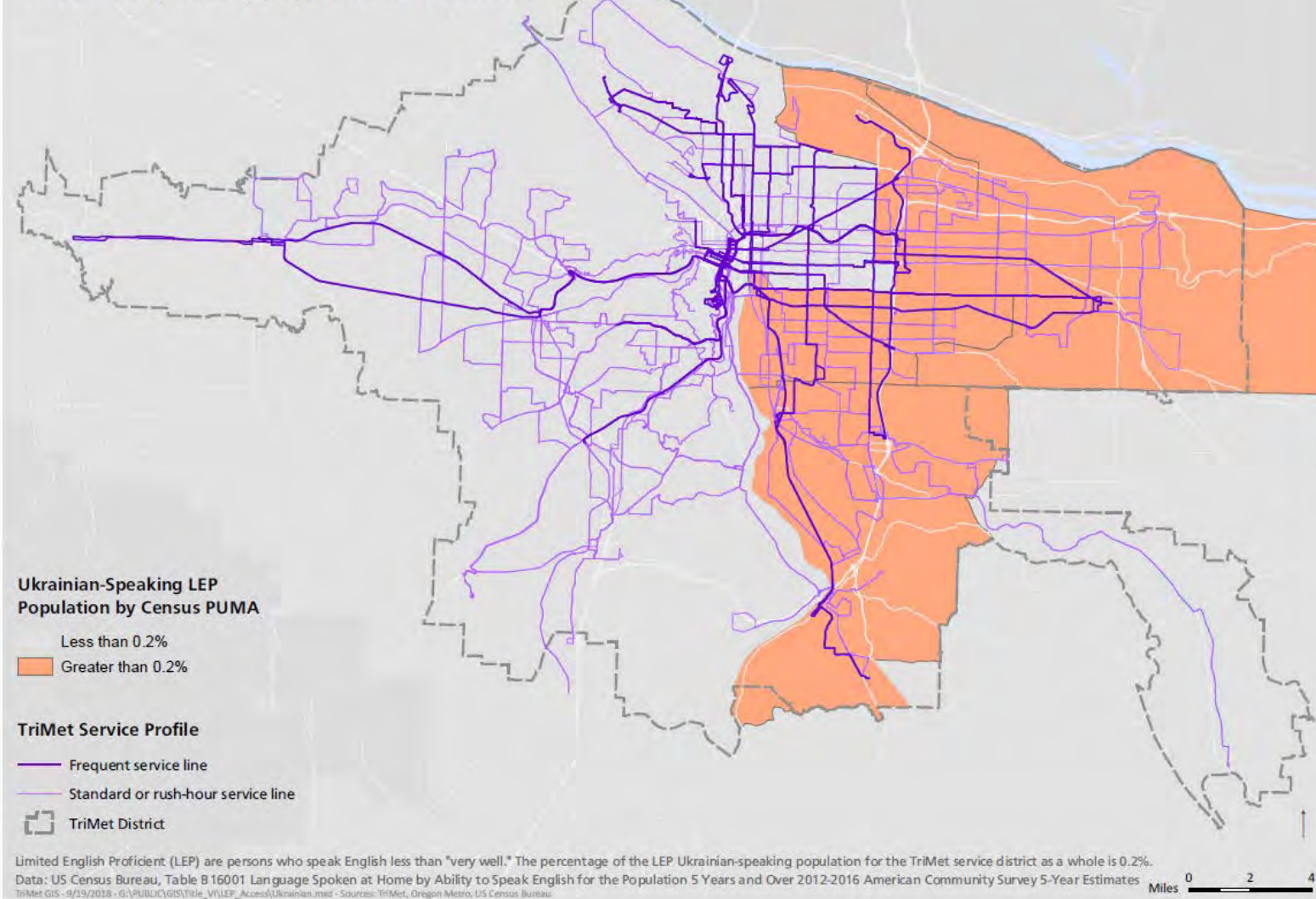


FIGURE 7: UKRAINIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

# Limited English Proficient Arabic-speaking population distribution

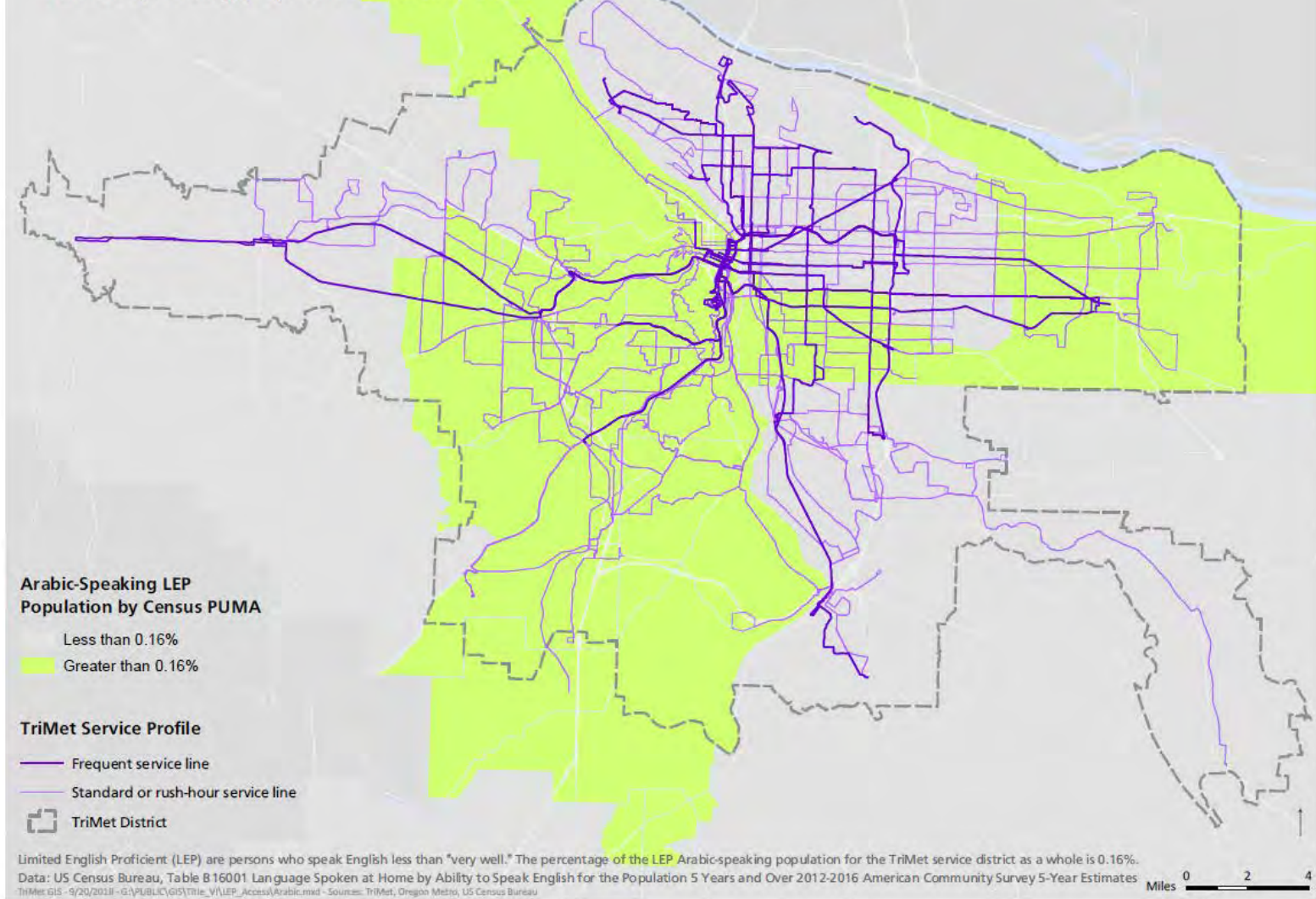


FIGURE 8: ARABIC-SPEAKING LEP POPULATION AND TRIMET DISTRICT

# Limited English Proficient

Tagalog-speaking population distribution

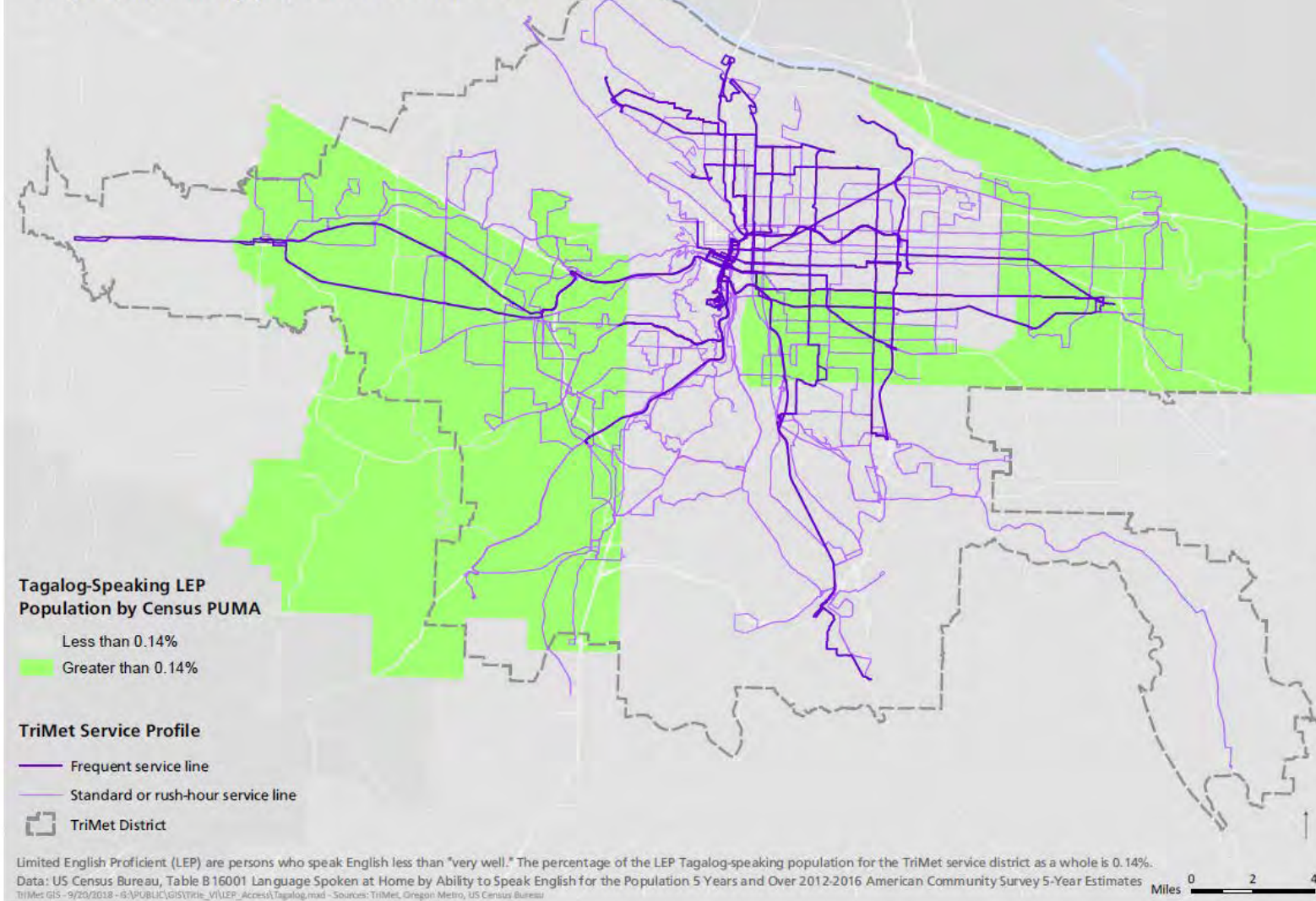


FIGURE 9: TAGALOG-SPEAKING LEP POPULATION AND TRIMET DISTRICT



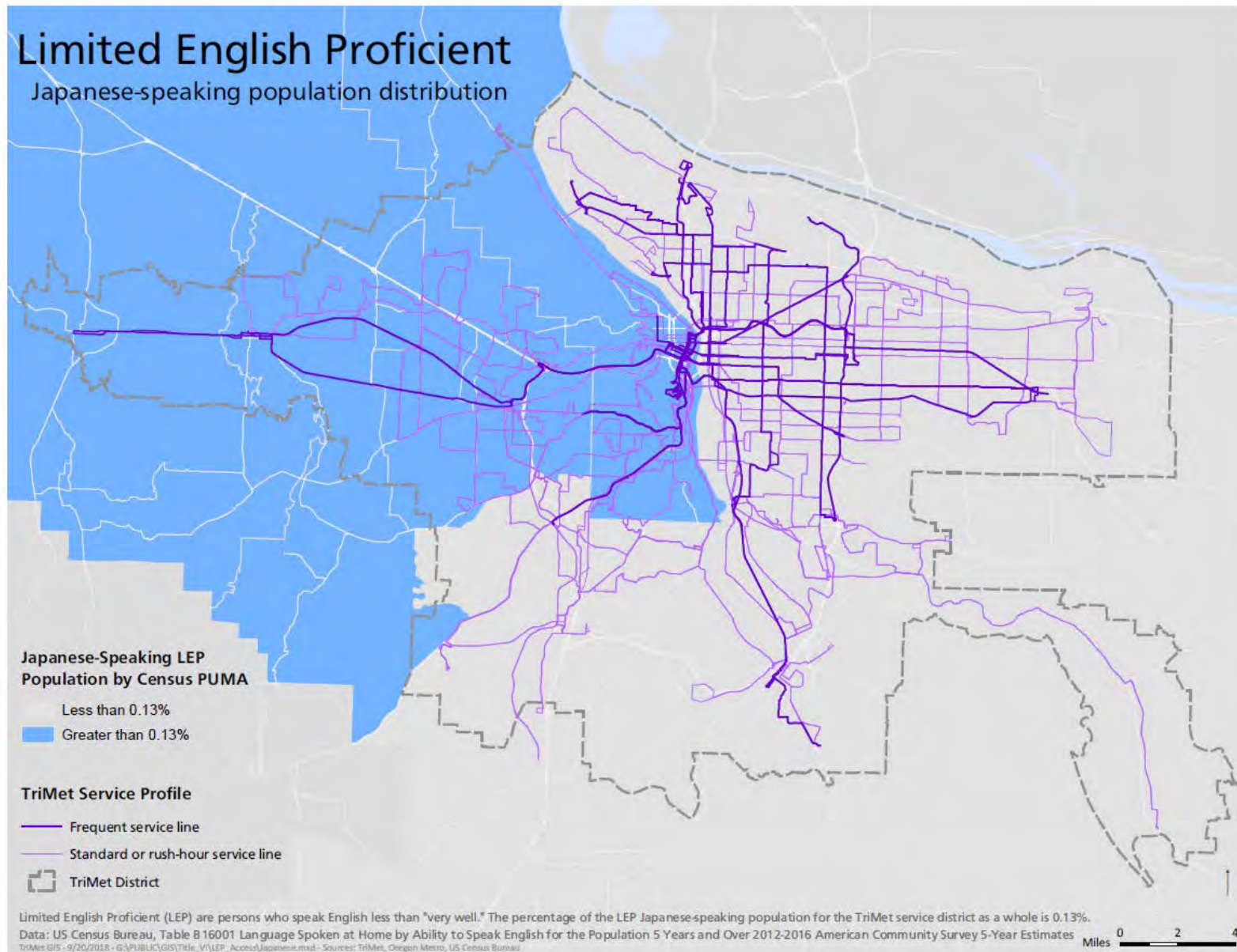


FIGURE 10: JAPANESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

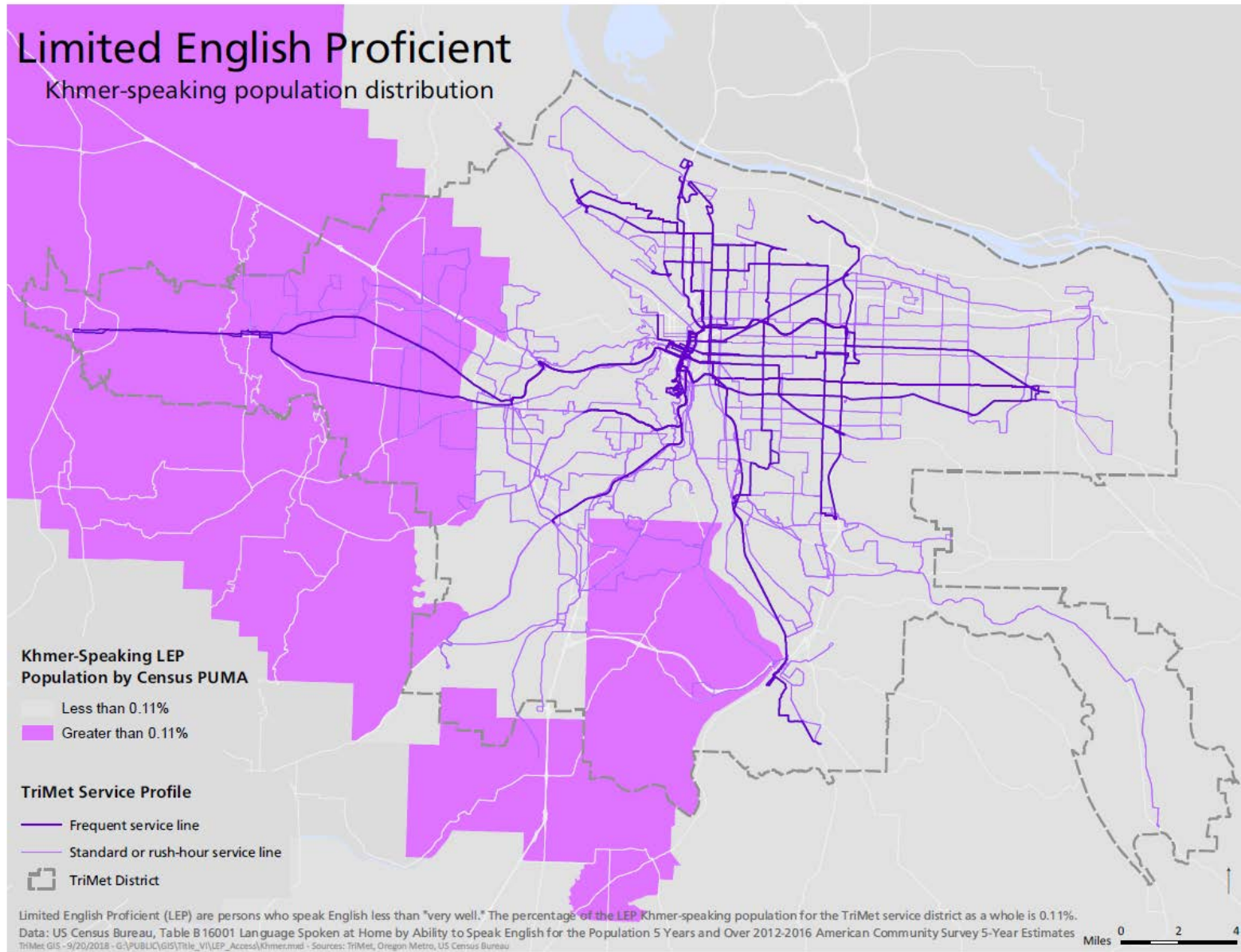


FIGURE 11: MON-KHMER-SPEAKING LEP POPULATION AND TRIMET DISTRICT

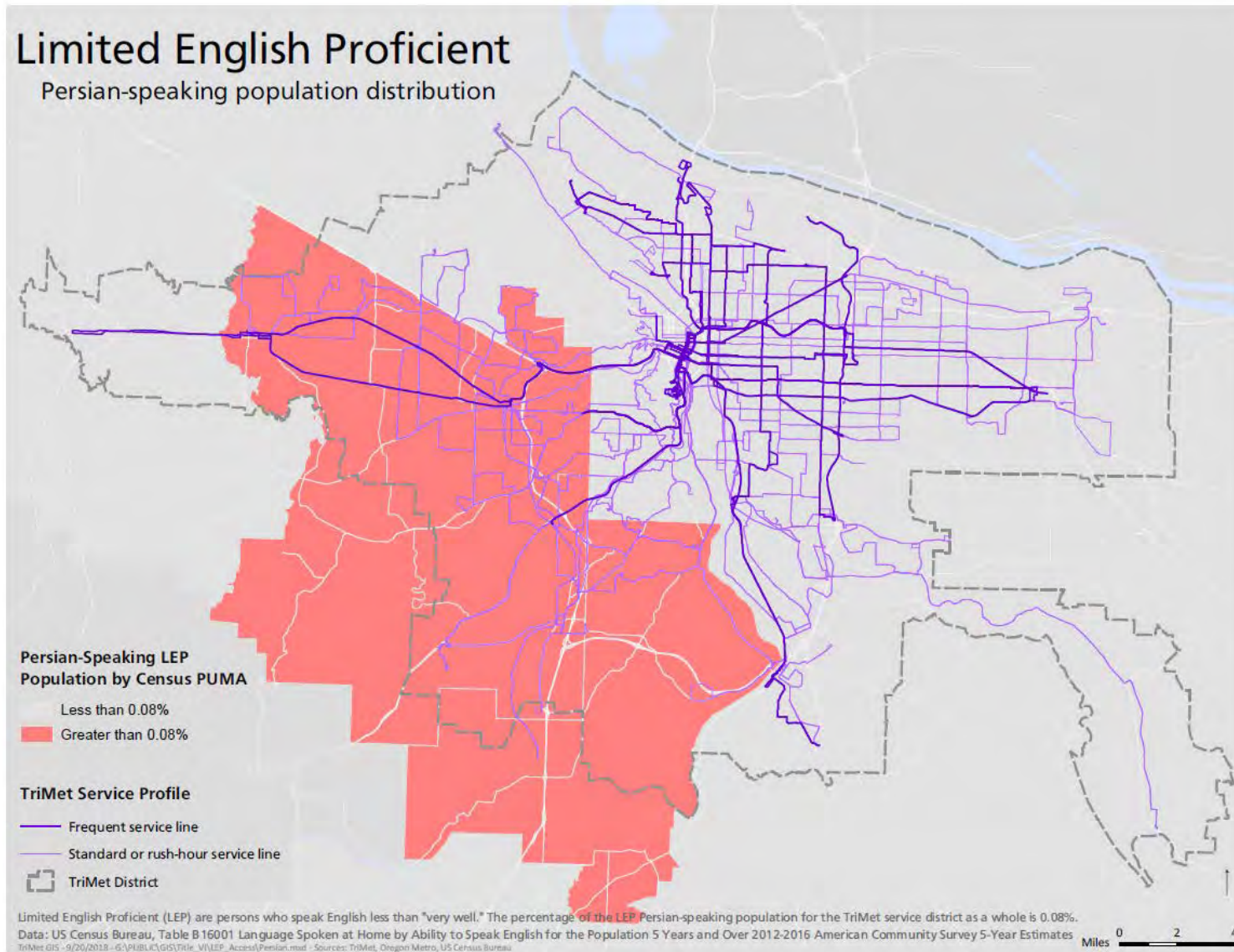


FIGURE 12: PERSIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

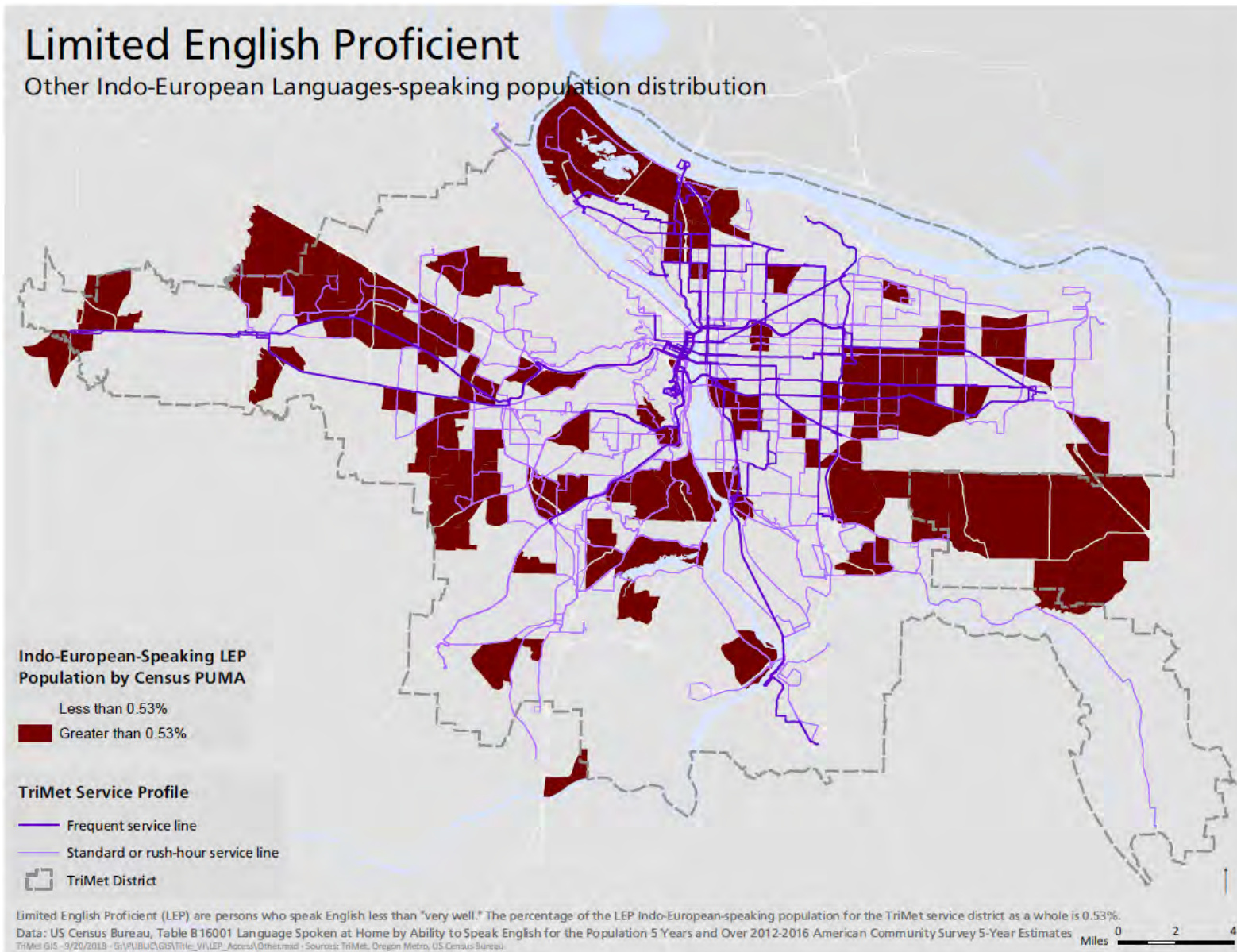


FIGURE 13: INDO-EUROPEAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

## Oregon Department of Education

In addition to considering the American Community Survey estimates, Factor 1 considered the most recent data on the Student Language of Origin from the Oregon Department of Education (ODE) for the 2017-2018 school years. The data includes statistics on the language spoken at home and enrollment in English as a Second Language (ESL) services by students ranging from kindergarten to high school. It is assumed that if children are identified as speaking a language other than English, then their parents or adult guardians are likely to speak the same language at home, especially for students receiving ESL services. While this data set does not identify the number of people above the school age that speak a language other than English, it can be a helpful complement to Census data.

Data was compiled from the following school districts serving students within the TriMet district boundaries: Beaverton, Centennial, David Douglas, Estacada, Forest Grove, Gladstone, Gresham-Barlow, Hillsboro, Lake Oswego, North Clackamas, Oregon City, Parkrose, Portland, Reynolds, Riverdale, Sherwood, Tigard, Tualatin, and West Linn-Wilsonville.

In total, 65,041 students have a language of origin besides English, 26,642 (41%) of whom received ESL services in 2017-2018. The top languages in terms of number of students are shown in Table 2.

**Table 2. Student Languages of Origin for School Districts within TriMet service district  
2017 - 2018**

Language	Number of Students	Pct Receiving ESL Services
Spanish	37,174	45%
Vietnamese	4,095	25%
Russian	3,499	37%
Chinese	2,842	27%
Arabic	1,676	51%
Somali	1,309	59%
Ukrainian	952	36%
Korean	884	26%
Romanian	784	32%
Japanese	794	37%
Chuukese	646	61%
Tagalog	491	33%

The school districts with the highest concentration of ESL students were:

1. **Reynolds** (located in the northeast corner of the TriMet district): 29% of students receiving ESL services.
2. **David Douglas** (located in East Portland): 24% of students receiving ESL services.
3. **Centennial** (portions in East Portland, Gresham, Damascus, and Happy Valley): 21% of students receiving ESL services.
4. **Forest Grove** (located on western edge of TriMet district): 17% of students receiving ESL services).
5. **Hillsboro** (located in western Washington County): 17% of students receiving ESL services.

## Oregon Health Authority

Data was compiled from participating Oregon Women, Infant, and Child (WIC) clinics from Washington, Clackamas and Multnomah counties. The date range was from January 1, 2016 to December 31, 2018. In total, there were 55 distinct languages spoken by clients frequenting the clinics. Utilizing the thirteen “safe harbor” languages in the TriMet service district, Table 3 shows a frequency count of unique clients by spoken language.

**Table 3. Spoken Languages of WIC Clients within the Tri-County Area**

Language	2016	2017	2018
Spanish	8815	7859	7086
Russian	827	840	817
Vietnamese	465	423	383
Chinese (Cantonese)	363	353	332
Chinese (Mandarin)	<30	<30	31
Arabic	209	249	263
Somali	234	213	200
Cambodian	<30	<30	<30
Persian-Farsi	<30	<30	<30
Japanese	<30	<30	<30
Tagalog	<30	<30	<30
Korean	<30	<30	<30
Romanian	<30	<30	<30
Ukrainian	<30	<30	<30

## Oregon Judicial Department

Statewide court language service requests were also compiled from the Oregon Judicial Department. Of note, 60% of all Oregon LEP individuals reside in just five counties: Multnomah, Washington, Clackamas, Marion, and Lane (Oregon Department of Transportation 2012). The date range was from January 1, 2016 to January 1, 2019.

**Table 4. Court Languages Service Requests within the State of Oregon  
2016 - 2019**

Language	Number of Persons	Language	Number of Persons	Language	Number of Persons
Spanish	27,699	Chinese	453	Tagalog	139
Russian	1,061	Somali	418	Korean	110
Chuukese	621	Mam	189	Romanian	97
Vietnamese	563	Persian-Farsi	151	Laos	84
Arabic	550	Swahili	143	Ukrainian	75

## Synthesis

Overall, LEP populations are concentrated primarily in western and eastern suburban locations as well as north Portland.

The ODE and ACS data largely align, with a few exceptions. For one, and as was the case in the 2012 Four Factor update, Somali is identified as one of the top non-English languages spoken in the TriMet district through the ODE data. The recent ODE data indicates that 1,309 Somali-speaking students received ESL services (59% of the total). With the addition of parents or adult guardians to this figure pushes Somali over the “safe harbor” provision of 1,000 speakers who are LEP. This may be a case of population undercount by the ACS.

The Romanian language group met the “safe harbor” provision with a total of 1,862 as of the 2011-2015 ACS. Due to recent Census language category changes, Romanian was added to the Indo-European language category. Additionally, with the number of student speakers (784) and their parents or adult guardians we can consider the threshold to have been met.

Arabic also stands out as potentially having a higher LEP population according to the ODE, WIC, and court data as compared to the ACS. Finally, there may be a larger LEP population of Chuukese speakers than the ACS would indicate, given that the number of student speakers is over 600 and the number of court language service requests.

## Factor 2: The frequency of contact with which LEP persons come in contact with a TriMet program, activity, or service

To conduct Factor 2, this assessment focused on information generated by agency personnel, technological systems and survey research. In the context of Factor 2, “relevant programs, activities and services provided” were defined as ridership, fares and customer information as these are the means by which people use or inquire about transit services and programs.

### Call Center Data

Customers who call TriMet’s Customer Service line (503-238-RIDE) can request language interpretation for 235 different languages. For the period of January 1, 2014 to October 1, 2018, the call center received 10,382 requests for language assistance, which equates to approximately 179 requests per month, or 7-8 requests per day.

Table 5 shows the most commonly requested languages by number of requests. At 70% of requests, the majority language assistance requested is for Spanish. Although Russian-speakers comprise the fourth-highest LEP population in the TriMet service area, Russian language assistance is the second-most frequently requested at 14% of language assistance orders.

**Table 5: Call Center language assistance requests**  
Jan 1, 2014 - Oct 1, 2018

Language	Orders	Percent
Spanish	7,245	70%
Russian	1,432	14%
Arabic	318	3%
Chinese - Cantonese	328	3%
Vietnamese	289	2%
Somali	110	1%
Farsi	74	1%
Chinese - Mandarin	95	1%
Korean	115	1%
Other	376	4%
Total Language Assistance “Requests”	10,382	100%



## Automated Information

Upon calling TriMet Customer Service, callers are asked if they want information in Spanish. From there, they can access Transit Tracker, fare information, or speak to a representative. The automated system logs which options were selected including how many callers requested information in Spanish.

From July 1, 2017 to June 30, 2018, there were a total of 253,103 instances logged of callers accessing Transit Tracker in Spanish, out of over 3 million total calls (or 7.2%). This represents a 73% increase in the proportion of callers selecting the Spanish language option since the last Four Factor Analysis in 2012. However, the actual volume of calls has decreased during that time for both English and Spanish speakers, likely due to more customers accessing information online, via text, and/or smart phone.

## TriMet Website

TriMet's website provides basic How to Ride information in eleven languages besides English (Spanish, Vietnamese, Chinese, Russian, Korean, Japanese, Tagalog, Romanian, Somali, Arabic, Cambodian, and Persian). This includes information on fare payment, rules for riding, safety and security, accessibility, and agency contact information including interpretation services. All these pages also have TriMet's Title VI notice, complaint procedures, and complaint form in the relevant language. As TriMet has prioritized resources on serving the largest group in the LEP population, the Spanish web pages have more extensive content in addition to a Trip Planner in Spanish.

The following table shows the page views for the period June 1, 2013 to March 31, 2016. It should be noted that customers often translate other pages of the site using third party services, such as Google translate or Microsoft translator and these are not trackable. However, the translated page views give a good indication of the balance of demand for those languages provided.

**Table 6. TriMet Website Translated Page View Summary**  
June 1, 2013 - March 31, 2016

Language	Quantity	Percent
Spanish	23,651	53%
Chinese	6,829	15%
Russian	4,985	11%
Korean	4,712	11%
Vietnamese	4,597	10%
Total	44,774	100%

## 2008 On-board Rider Survey

TriMet conducted an on-board rider survey in spring 2018 for the purposes of collecting information about transfers, fare payment, and demographics. The full survey was available in both English and Spanish. Those who took the survey in Spanish and English were asked a question about their native language. Riders were asked to select their native language on a tablet, and then answer a question about English proficiency in their selected language. Results are shown in Table 7, generally reflecting the population distribution with the exception of the Arabic-speaking LEP persons comprising a greater percentage than expected. Survey results also indicate that 38% of riders speak English less than very well.

**Table 7. LEP respondents to on-board survey, by native language**  
Spring 2018

Language	Count	Percent
Spanish	633	39%
Vietnamese	127	8%
Chinese	103	6%
Arabic	67	4%
Russian	65	4%
Japanese	62	4%
Tagalog	53	3%
Korean	25	2%
Somali	23	1%
Romanian	19	1%
Persian-Farsi	16	<1%
Ukrainian	16	<1%
Cambodian, Khmer	4	<1%
Other	430	26%
Total	1643	100%

## 2008 Bus Operator Survey

TriMet conducted a survey of bus operators<sup>1</sup> to further explore the frequency of contact with LEP persons. Since bus operators are often the first contact LEP passengers have with TriMet, this research was designed to find:

- How often and on which routes operators encounter LEP passengers
- How operators communicate with LEP passengers
- What ideas operators have to improve communication with LEP passengers

<sup>1</sup> MAX operators were not surveyed because they have less direct interaction with riders, as they operate the train in a closed compartment.

A total of 225 bus operators were surveyed at Center Street Garage during the summer 2018 schedule sign-up. Interviewing times were spread evenly throughout the two-week sign-up process to ensure operators with varying lengths of service were represented. As a group, these operators had driven 65 of the 80 bus routes in the TriMet system in the past year.

Overall, 80% of operators surveyed indicated that they had encountered LEP riders at least a couple of times a month over the past year. Approximately 60% said they had encountered LEP riders several times a week or more. In fact, only eight out of the sixty-five routes did operators say they had never encountered LEP riders over the past year.

The bus lines where operators reported the most frequent contact with LEP riders were:

- **Line 57-TV Hwy/Forest Grove** - Connects the Washington County cities of Forest Grove, Cornelius, Hillsboro, Aloha, and Beaverton, which is the area with the region's highest concentration of Spanish speakers. Additionally, there high concentrations of LEP persons speaking Persian, Khmer, Japanese and Tagalog.
- **Line 72-Killingsworth/82<sup>nd</sup>** - Travels between Clackamas Town Center and Swan Island, traveling north and south along 82<sup>nd</sup> Ave, which has a particularly high concentration of LEP persons speaking Vietnamese, Chinese, Ukrainian, and Russian.
- **Line 6-Martin Luther King Jr Blvd** - Connects Goose Hollow, Portland City Center, N/NE Portland, Jantzen Beach and Hayden Island, via Jefferson/Columbia, Grand/MLK, and Vancouver Way, the Line 6 serves areas with high concentrations of Vietnamese, Chinese, and Romanian speaking LEP populations.
- **Line 77-Broadway/Halsey** - Travels between Troutdale and downtown Portland, serving areas with high concentrations of Spanish, Vietnamese, Russian, Ukrainian, Arabic, and Tagalog speaking LEP populations.
- **Line 73-122<sup>nd</sup> Ave** - Travels between Parkrose/Sumner Transit Center and SE 94th & Foster, the Line 73 serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, Russian, Ukrainian, Chinese, and Romanian.

The Lines 57, 72, and 77 were all frequent mentions in the 2016, 2011, and 2005 iterations of the operator survey. The 2016 survey revealed Lines 20 and 4 as two additional bus lines where operators reported frequent contact with LEP riders.

- **Line 4-Division/Fessenden** - Once one of the longest routes in the TriMet system, the Line 4 traveled between St. Johns and Gresham via downtown Portland. The Line 4 was split fall of 2018. The Line 4-Fessenden serves areas with high concentrations of Spanish, Russian, and Korean. Whereas, the Line 2-Division serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, Russian, Ukrainian, Chinese, Arabic, Tagalog, Japanese, and Romanian.

- **Line 20-Burnside/Stark** - As the longest route in the TriMet system, the Line 20 serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, and Russian.

## 2018 Road and Rail Supervisors Survey

TriMet conducted a survey of road and rail supervisors. Similar to operators, road and rail supervisors can be one of the first contacts LEP passengers have with TriMet. This research was designed to find:

- How Road and Rail supervisors communicate with LEP passengers
- How often and where Road and Rail supervisors encounter LEP passengers
- What ideas Road and Rail supervisors have to improve communication with LEP passengers

Forty-two road and rail supervisors were surveyed at the Center Street Administration location in the fall of 2018. This represents more than half of the staff dedicated for these positions (63 total). As a group, these road and rail supervisors worked all 13 districts in the TriMet system in the past year. Road supervisors work the eight districts illustrated in Figure 14 as well as district 19 and 20 which are mobile units.

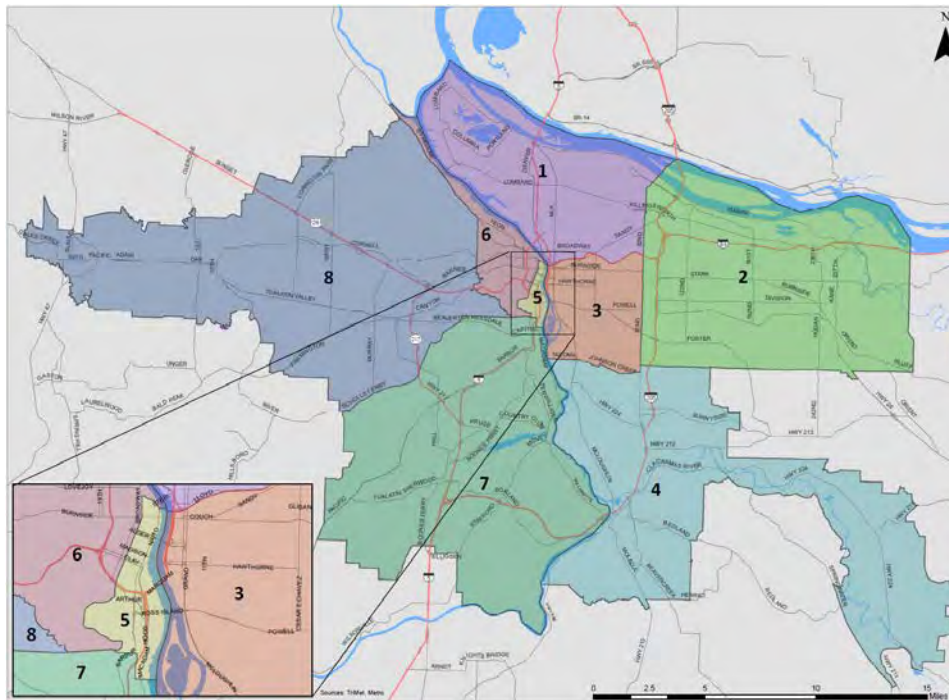


FIGURE 14: ROAD SUPERVISOR BOUNDARY AND TRIMET DISTRICT

The coverage area for rail supervisors are divided into three districts:

- Central coverage is bounded by Expo Center to the north (including the entire Yellow Line), PSU to the south (including the entire Transit Mall), Goose Hollow to the west and NE 82nd to the east (encompassing portions of the Blue Line, Green Line, and Red Line).
- Eastside coverage is bounded by Cleveland Ave. to the east, NE 82nd to the west, Portland Airport to the north and Clackamas Town Center to the south. Includes portions of the Blue, Green and Red Line.
- Westside coverage is bounded by Hatfield Government Center to the west and Washington Park to the east, encompassing portions of the Blue Line and Red Line.

Overall, 70% of road and rail supervisors surveyed indicated that they had encountered LEP riders at least a couple of times a month over the past year. Approximately 40% said they had encountered LEP riders several times a week or more. In fact, all road and rail supervisors said they encountered LEP riders in all districts over the past year.

Districts 5, 8, 6, and 9 were reported to be where road supervisors had the most frequent contact (i.e., asked for information several times a week or more) with LEP riders. Whereas, all 3 districts were comparable for rail supervisors at 43% for Central, 36% for Eastside, and 25% for Westside.

## 2018 Fare Survey

Finally, TriMet conducted a system-wide fare survey. A total of 267 out of 23,420 respondents were LEP. The heat map in Figure 15 illustrates the concentration of trips made by LEP riders.

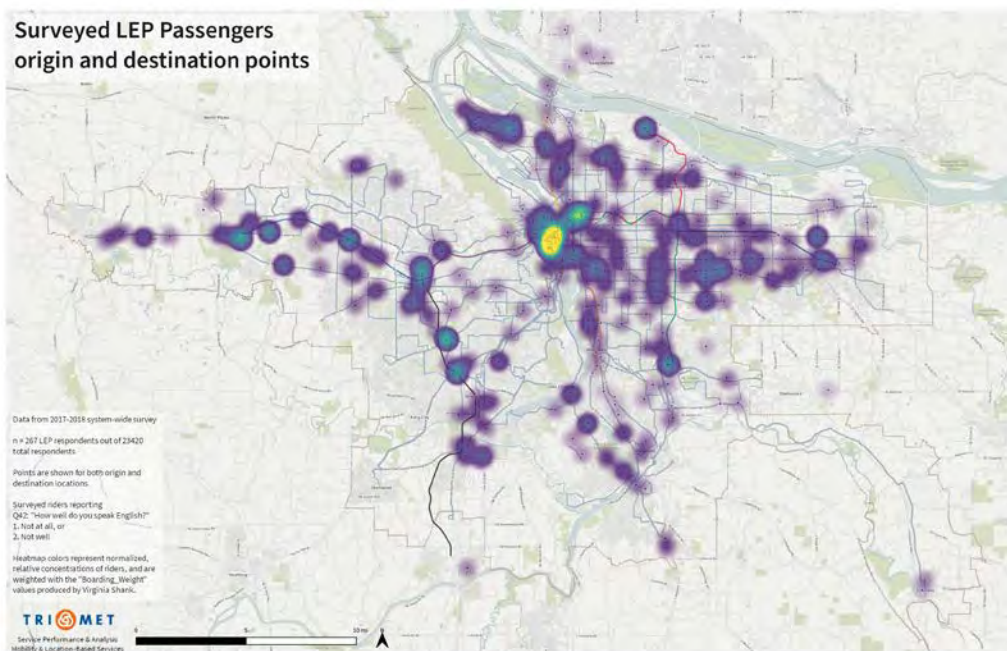


FIGURE 15: LEP CONCENTRATION OF RIDERS AND TRIMET DISTRICT

## 2019 Language Services Survey

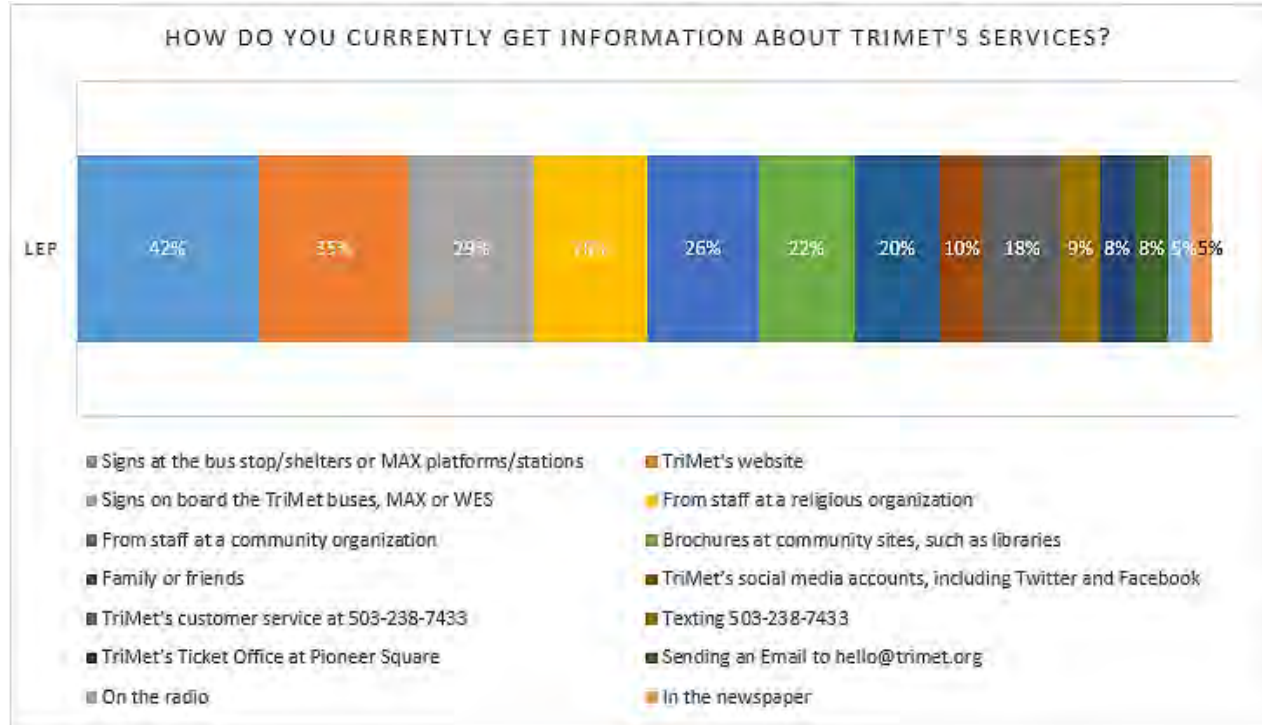


FIGURE 16: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES

### Synthesis

The Factor 2 analysis confirmed much of what has been found previously: LEP persons have frequent contact with TriMet services and programs. One exception to this, however, is the TriMet website. But customer service language assistance data, automated calls (Transit Tracker), an on-board survey, as well as a survey of operators and road and rail supervisors indicate that LEP populations are commonly requesting information and riding TriMet vehicles.

The data shows that Spanish speaking LEP persons continue to have the most frequent contact with TriMet services. This is not surprising given that this population represents the largest portion of the LEP population, and that TriMet places a particular emphasis on providing access for Spanish speakers.

Another important finding to note is the different ways that different language speakers choose to access TriMet information, according to the data. Russian speakers more commonly call TriMet customer service than any other group besides Spanish speakers (by a significant margin), yet they comprise just the fourth-highest LEP population. On the other hand, TriMet receives relatively few requests for language assistance via phone by Vietnamese and Chinese speakers even though they comprise the second and third highest LEP populations, respectively. The implication is that there is no “one size fits all” approach to providing meaningful language assistance. Moreover, there is great importance to understand how LEP populations currently get information about TriMet’s services to help determine the allocation of agency resources. As noted in Figure 16, the top two categories where non-English speakers currently receive information is “Signs at bus stop/shelters or MAX platforms/stations” as well as “TriMet’s website”.

### Factor 3: The importance to LEP persons of your program, activities, and services

TriMet has held roundtable discussions, focus groups, and other outreach events over the past several years with the goal of engaging LEP populations as to how they use TriMet and what suggestions they have for improvement. Most recently, the Transit Equity, Inclusion, and Community Affairs department administered a Language Services Survey to all 13 language groups within the TriMet service district. Additionally, bus operator as well as road and rail supervisor were surveyed to solicit information from more informal engagement with LEP riders, i.e. day-to-day interactions on-board. A summary of these various efforts is provided below, going back to 2005.

#### 2019 Language Services Survey

The Language Services Survey full report can be accessed in the 2019 Language Access Plan. A total of 962 responses, representing 9 out of the 13 safe harbor languages, were received through various engagement efforts. One question asked in the survey that is relevant to Factor 3 is shown in Figure 16. Survey respondents indicated a high importance ranking across all question-type categories. Alternatively stated, LEP populations find it very important to important on being able to get their questions answered in their language.

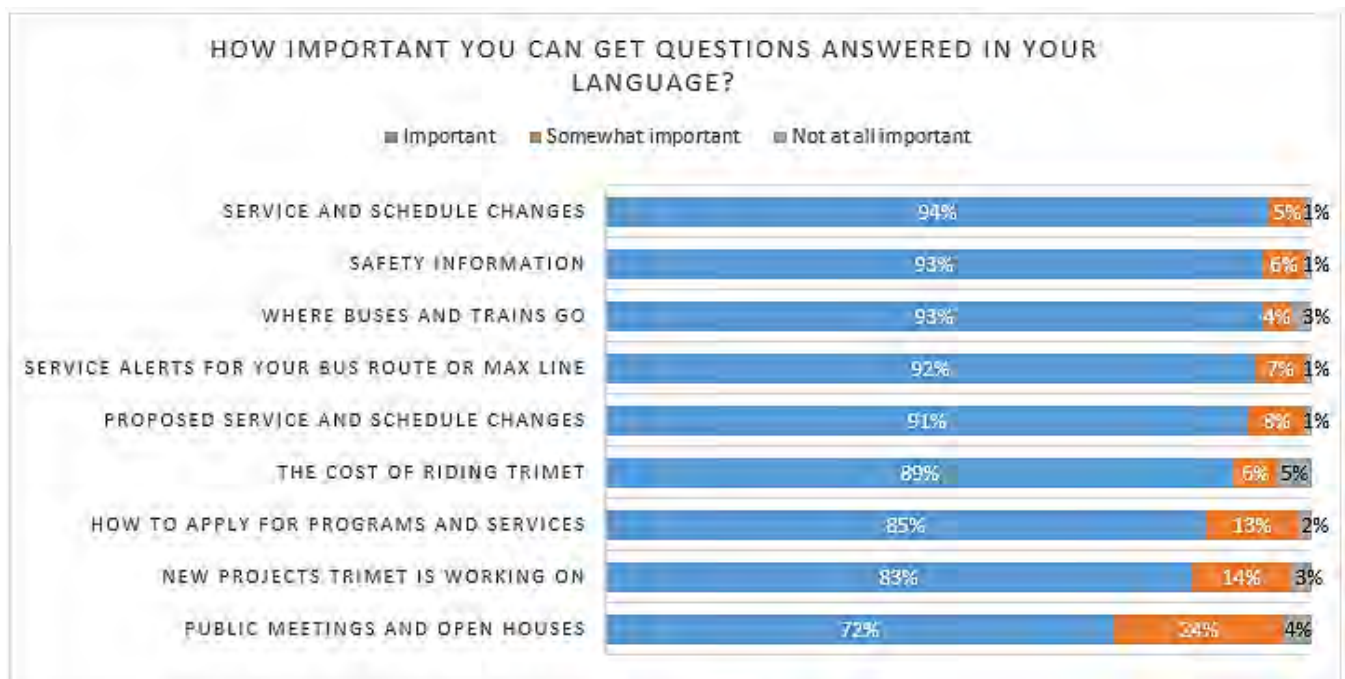


FIGURE 17: HOW IMPORTANT YOU CAN GET QUESTIONS ANSWERED IN YOUR LANGUAGE

## 2018 Bus Operator Survey

The results of the bus operator survey described under Factor 2 are also useful to inform Factor 3. Operators were asked about the types of questions they are commonly asked by LEP riders. Their top responses to this open-ended question were:

- How to get to their destination or building (86% of operators mentioned this).
- Which bus to take or which bus stop to use (57% of operators mentioned this).
- Questions about fares (22% of operators mentioned this).

This is consistent with findings from operator surveys conducted in 2005, 2011, and 2016.

## 2018 Road and Rail Supervisors Survey

The results of the road and rail supervisors survey described under Factor 2 are also useful to inform Factor 3. Road and rail supervisors were asked about the types of questions they are commonly asked by LEP riders. Their top responses to this open-ended question were:

- How to get to their destination or building (85% of operators mentioned this).
- Which bus to take or which bus stop to use (68% of operators mentioned this).
- Questions about fares (45% of operators mentioned this).

## 2017 Service Enhancement Plans – Washington County

TriMet contracted with JLA Public Involvement to work in partnership with community based organizations serving minority, low-income earning, and/or limited English proficiency communities to hold community meetings to discuss transit service priorities in each of the following areas of Washington County:

- Cornelius/Forest Grove
- Aloha/Beaverton
- Tigard/Tualatin/SW Portland

The meetings included five bilingual discussion groups in the following languages: Spanish, Korean, Cantonese, Somali, and Swahili. A total of 123 community members participated in the meetings. Of the participants, 102 community members submitted surveys that provided additional comments on transit improvements and demographic data.

Of relevance to Factor 3, we learned the following:

- 45% of participants were regular or frequent TriMet riders, and 8% were non-riders.
- The most common reasons given for taking TriMet were for shopping, visiting family/friends, school, and medical appointments/hospital visits.
- One-quarter of participants did not have a vehicle in the household and 44% said they usually don't have a car available.
- 59% of participants said they earned an income of \$29,999 or less in 2016.



- Riders with language barriers may have difficulty communicating with bus operators or may not be able to understand on-board announcements, which can have impacts on their travel.

## 2016 Service Enhancement Plans

In early 2016, TriMet partnered with community-based organizations to conduct focus group meetings with Spanish, Vietnamese, Russian, and Nepalese speakers. Staff also hosted a booth at a community “Noche Latina” event. The purpose of this outreach was to help inform a vision for future bus service in the TriMet district. It included a questionnaire to get a better understanding of how participants use TriMet as well as their needs and priorities. A total of 156 individuals participated.

Of relevance to Factor 3, we learned the following:

- 64% of participants were regular or frequent TriMet riders, and only 3% were non-riders.
- The most common reasons given for taking TriMet were for work, shopping, school, and medical appointments/hospital visits.
- One-fifth of participants did not have a vehicle in the household.
- Participants sought better access to industrial employment areas as well as extended and weekend hours to support early/late/weekend shifts.
- Riders with language barriers may have difficulty asking others to move out of priority seating, or may not be able to understand on-board announcements, which can have impacts on their travel.

## 2016 Fare Enforcement

As part of an effort to review practices surrounding enforcement of fare payment, TriMet partnered with several CBOs to host listening sessions on the topic in summer 2016. Two of these listening sessions were held in Spanish, and another was in English with Vietnamese interpretation as most participants spoke Vietnamese. A total of 58 persons participated between these three events, most of whom spoke limited English.

Of relevance to Factor 3, we learned the following:

- Upon first arrival in the U.S./Portland for immigrant and refugee populations, TriMet is relied upon heavily to meet transportation needs. However, navigating the TriMet system and understanding the rules for riding (including fare payment) are made difficult by language barriers.
- Some voiced concerns about discrimination against Hispanic/Latino riders, with participants suggesting more training and more information for the community in Spanish.

## 2015 Electronic Fare

In advance of migrating to an electronic fare (eFare) system, TriMet held discussion groups to assess potential impacts of such a change. One of these groups was held in Spanish, while two others were held in English with Spanish, Arabic, Somali, and Nepali interpretation. A total of 41 LEP persons participated in these discussions.

Of relevance to Factor 3, we learned the following:

- LEP participants voiced some concerns about language barriers to registration of smart cards under the new system.
- Some were concerned about law enforcement/immigration implications of the associated database holding customer information.
- As with non-LEP community members, many LEP participants were looking forward to using the new eFare system, with some concerns about logistics.

## 2011 Spanish Focus Groups

Four focus groups were conducted in Spanish and held at locations in Clackamas, Washington, and Multnomah counties. The sessions were hosted by community organization and organized by an independent contractor. A moderator facilitated the groups and participants spoke in Spanish while staff from TriMet observed and listened to the interactions through the use of a simultaneous interpreter. Most participants (as was the case in 2005) said they were dependent and relied on transit for almost all their travel in the region. In addition, there was limited knowledge of language assistance that could be accessed by calling 503-238-7433 (RIDE). Most participants showed a high level of awareness of the informational channel cards in Spanish found in TriMet’s bus and rail vehicles. Other findings were similar to those identified in 2005. LEP customers who are new to the area and/or don’t understand English well, or have limited literacy in their own language rely heavily on family, friends and trusted community organizations to help them find their way.

## 2008 Spanish-speaking Community Leaders Gathering

In 2008, the LEP program convened key community leaders working with Spanish speaking LEP constituents to review TriMet information pieces, icons and technology offerings to determine usefulness to LEP populations. This group was facilitated by TriMet’s LEP outreach coordinator. The group consisted of 21 participants representing the following organizations: Latino Network, Victory Outreach Community Services, Centro Cultural of Washington County, Ministerio Hispano St. Anthony Church, Santos Futbol Club, El Programa Hispano, Proyecto Unica, Multnomah County Library-Latino Outreach, MEChA, Padres Hispanos Escuelas Públicas de Portland, Instituto de los Mexicanos en el Exterior (IME), Centro Baltazar Ortiz, Hacienda CDC, and Multnomah County Sun Schools. As a result of the input and continued involvement of the group as “community advisors”, major improvements were made to printed materials, web content, and customer service telephone assistance.

## 2005 Community Roundtables

Four roundtables were initially conducted in 2005– two in Spanish, one in Russian, and one in Vietnamese. Discussions were led by a member of each community and interpreters were available for TriMet staff. Results from these LEP community roundtables indicated that:

- TriMet programs and services were very important to LEP community members as most said they were transit dependent<sup>2</sup> and relied on transit for almost all of their travel in the region (work, school, visiting, shopping, etc.)

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<sup>2</sup> Transit Dependent: I don’t have a car available to use, or I can’t drive / don’t know how to drive

- The primary frustrations LEP customers experienced using TriMet were consistent with those experienced by other TriMet riders such as: late buses, pass-ups, concerns for personal safety, rude employees, fares, confusion over zones boundaries, and transfers. However, language barriers inhibited satisfactory resolution of LEP customer issues.
- Most participants were unaware of the language services TriMet has to offer. Thus, few had ever made use of those services.
- Many LEP customers were new to the country and/or don't understand English well, they relied heavily on family, friends and trusted community organizations to help them adapt and find their way.

## Synthesis

A consistent finding from these efforts has been that there are many LEP persons who rely on TriMet to meet their transportation needs, especially those who do not have other means of transportation. This includes a significant number of LEP customers who rely on TriMet's LIFT Paratransit service, which serves those who are unable to fully utilize fixed route transit.

Concerns and feedback from LEP riders largely mirrors that of non-LEP populations, with the exception of language barrier issues. Such barriers can effectively compound frustrations with the TriMet system as LEP riders may not always receive explanations for operational problems in their language of origin, and may feel limited in terms of providing feedback to TriMet. This highlights the importance of continually striving to make LEP riders aware of available language assistance services and to translate important communications.

## Factor 4: The resources available to TriMet and costs to provide LEP assistance

To conduct Factor 4, TriMet assessed the resources available for LEP assistance, the cost of providing those resources, and awareness of our bus operators of these resources.

### Resources and Costs

TriMet reviewed the language assistance services it has provided since the last Four Factor update in 2012 and the associated costs for each. Figures are shown in Table 8.

**Table 8. LEP Spending FY 13-19\***

Item	Total
Telephone Interpretation	\$268,613
In-person Interpretation	\$88,210
Brochures/literature	\$48,633
Customer surveys	\$30,523
Document Translation	\$12,989
Channel Cards	\$7,656
Newspaper Ads	\$6,925
Civil Rights Signage	\$745
<b>Total</b>	<b>\$464,294</b>

*\* Not including staff labor*

TriMet provides a variety of resources to support the needs of LEP customers. Telephone interpretation in 235 languages is available upon request when customers call TriMet customer service. In-person interpretation is provided upon request for community engagement, and TriMet also holds special focus group or other outreach events with the intent of engaging LEP individuals, as discussed under Factor 3. Beyond translation of vital documents, TriMet works to provide materials in multiple languages for programs or projects when significant LEP populations are potentially impacted. One example of this is the development of Service Enhancement Plans by subarea of the TriMet district, for which fact sheets were translated into languages that had high LEP populations in each subarea.

In all, the cost of providing these resources is approximately \$464,294 since July 2012, with the largest portion coming from telephone interpretation services (about 58% of the total). With document translation, costs incurred include both the translation and additional production of printed materials. TriMet also commonly advertises in non-English newspapers in an effort to reach LEP persons.

What is not accounted for in Table 6 is the staff costs incurred in working to provide access to LEP individuals. Various staff from Operations, Policy & Planning, Transit Equity, Inclusion, & Community Affairs, Customer Information Services, Creative Services, Communications, and Engineering & Construction are often involved in these efforts, as TriMet strives to find creative ways to address the diverse customer base it serves, in particular LEP riders.

Additionally, many staff have skills that serve as a non-quantifiable resource for LEP riders. Of the 225 bus operators surveyed, 36% indicated that they spoke a language besides English. The majority of this group speaks Spanish, with Chinese and Japanese as the next two most common languages spoken. About 32% of multilingual operators say they use the non-English language they speak at least several times a week. Of the 42 road and rail supervisors surveyed, 50% indicated that they spoke a language besides English. The majority of this group speaks Spanish, with Arabic as the next most common language spoken. About 33% of multilingual operators say they use the non-English language they speak at least once per day or more.

## Awareness of Resources

When operators were asked if they were aware of any materials, services, or tools that TriMet uses to communicate with LEP riders, only 38% said they were. The most common service mentioned was telephone language interpretation, followed by the TriMet website and channel cards in Spanish. Thirty-seven percent of operators said they felt equipped to communicate with LEP riders and 26% noted that it depends on the language spoken by the passenger (89% indicated they were equipped to communicate with passengers that spoke Spanish). The remaining 36% noted they did not feel equipped to communicate with LEP passengers.

When road and rail supervisors were asked if they were aware of any materials, services, or tools that TriMet uses to communicate with LEP riders, more than three-quarters (76%) said they were. The most common service mentioned was telephone language interpretation, followed by the TriMet brochures (non-specific) and employees/passengers who speak another language. Most road and rail supervisors (77%) said they felt equipped to communicate with LEP riders and less than one-third said they did not.

Equally as important in understanding staff awareness of resources are LEP population’s awareness of TriMet’s services for non-English language services. Figure 17 illustrates the level of awareness for LEP populations. The highest percentage of awareness is “Signs in Spanish on TriMet vehicles and at TriMet stations” at 45% followed by “Materials/brochures in your language” at 31 percent.

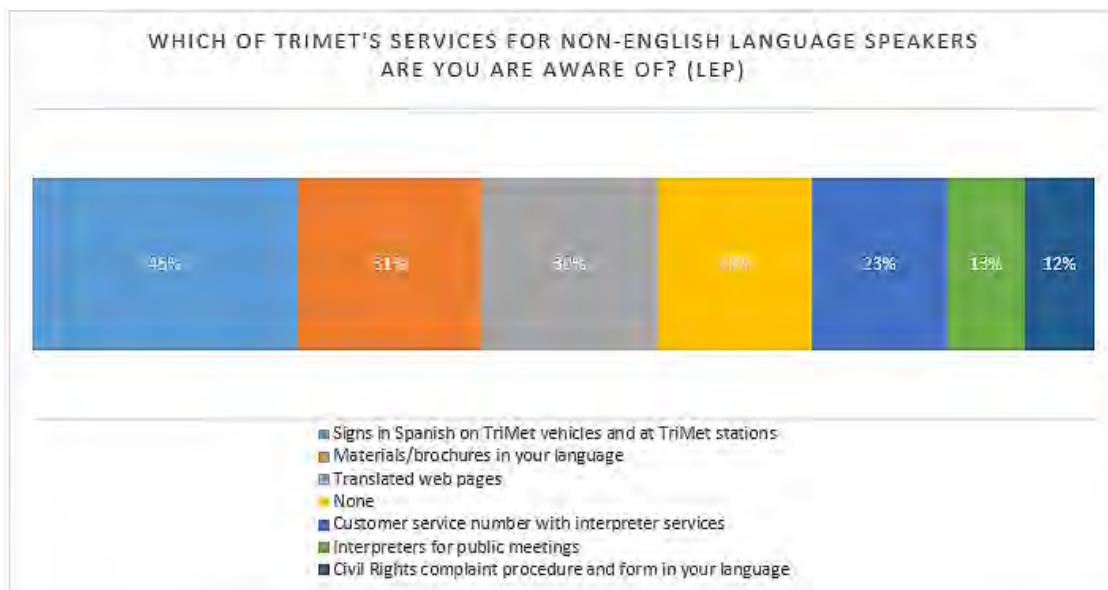


FIGURE 17: HOW IMPORTANT YOU CAN GET QUESTIONS ANSWERED IN YOUR LANGUAGE

## Conclusions

TriMet is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with Limited English Proficiency. This updated Four Factor Analysis will guide TriMet efforts to retain successful program and activities designed to meet the language needs of LEP populations, and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services.

The following conclusions are drawn from this Four Factor Analysis:

1. A significant number of LEP individuals live in the TriMet service district, and at least 13 languages meet the "safe harbor" threshold of at least 1,000 LEP persons (Spanish, Vietnamese, Chinese, Russian, Korean, Ukrainian, Japanese, Tagalog, Romanian, Arabic, Mon-Khmer Cambodian, Persian/Farsi, and Somali).
2. TriMet is an important service for many LEP persons, as evidenced by relatively high rates of transit dependence, high ridership frequency, and the variety of transit trips taken.
3. Various LEP populations access information in different ways, so engagement and communications should be adapted based on what is most effective for each language or culture.
4. For LEP customers, resolving customer concerns can be hindered by the language barriers between them and agency personnel.
5. TriMet uses considerable resources to provide language assistance, but should work to increase awareness of available resources among riders and front-line staff.
6. Reliance on trusted sources for information underlines the importance of growing and maintaining personal relationships within the LEP communities.
7. Initiating, maintaining, and strengthening relationships with community organizations that serve LEP populations is important because they provide help to new arrivals as they adapt and find their way in the region.

# Appendix A: Language Access Survey Report

# Language Access Plan

2019 LANGUAGE ACCESS SURVEY REPORT

Transit Equity, Inclusion, and Community Affairs Department  
TRIMET | 1800 SW 1ST AVENUE | PORTLAND, OR 97201



## Executive Summary

Limited English Proficiency is a diverse category that spans across different linguistic and cultural groups. Although there are common barriers in terms of accessing information about the system, there are also specific concerns that are unique to each of the language groups surveyed. Based on what was learned through this process, staff would like to emphasize there is not a one size fits all approach when it comes to engaging communities of various LEP backgrounds. In order to have effective and clear communication and access, it is important to take these issues into account when choosing and designing outreach methods.

## Key Findings

1. TriMet is an important service for many LEP persons.
2. Various LEP populations access information in different ways, so engagement and communications should be adapted based on what is most effective for each language or culture.
3. Almost all LEP respondents indicated they speak, read, and understand English less than very well. This leads to potential barriers for language groups to access service and program related materials.
4. For LEP customers, resolving customer concerns can be hindered by the language barriers between them and agency personnel.
5. TriMet should work to increase awareness of available language access resources among LEP riders. Reliance on trusted sources for information underlines the importance of growing and maintaining personal relationships within the LEP communities.
6. Initiating, maintaining, and strengthening relationships with community organizations that serve LEP populations is important to expand upon efforts to ensure TriMet is providing meaningful access to its' programs and services.
7. Most LEP communities find information about the system on the system. Further engagement opportunities should explore what information they gather and how they interpret it.
8. Digital respondents wanted more info in digital format, in person respondents wanted more information on the system and at CBOs.
9. Safety and security – a call for more security. Low knowledge of what to do in case of an emergency.
10. Driver interaction was highly important to customer satisfaction. Many request were made for more courteous and/or bilingual drivers.

## Acknowledgements

TriMet staff would like to thank the various community organizations that serve LEP populations throughout the Tri-County area. Without their support, the vast number of survey responses would not have been achieved. The information collected and insight gained will undoubtedly improve TriMet's ability to serve LEP populations as well as increase their access to TriMet's services and programs. Key organizations include the following:

Asian Pacific American Network of Oregon	African Family Holistic Health Organization
Asian Health and Services Center	Bienestar
Catholic Charities	Centro Cultural
Consulado Mexicano	El Programa Hispano Catolico
Hacienda CDC/Baltazar Community Center	Immigrant & Refugee Community Organization
Latino Network	Portland ESL Network
Verde	

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Attachment 1: Language Services Survey Instrument

## I. Background

Dating back to 2005, TriMet has held roundtable discussions, focus groups, and other outreach events with the goal of engaging Limited English Proficiency (LEP) populations as to how they use TriMet and what suggestions they have for improvement. Most recently, the Transit Equity, Inclusion, and Community Affairs department administered a Language Services Survey to “safe harbor<sup>1</sup>” language groups within the TriMet service district. The main goal of this survey was to support the update of TriMet’s Language Access Plan. This plan demonstrates TriMet’s commitment to make our transit system accessible and welcoming to all.

This report documents the survey results, key findings, staff recommendations for the agency at large as well as the lessons learned throughout the survey administration process.

## II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration (“FTA”) financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

*“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.”*

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). TriMet is committed to full compliance with the Circular, Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with limited English proficiency, or LEP.

## III. Survey Instrument Design

Martin González led the development of the survey instrument and survey methodology with assistance from Nathan Jones, Mariya Klimenko, John Gardner, Wendy Serrano, and Carl Green Jr. This core workgroup contributed to reviewing and editing drafts of the survey instrument, survey approach, survey administration, and survey collection.

## IV. Methodology

A 24-item survey instrument was translated into all 13 “safe harbor” languages. Surveys were distributed in-person, direct email, and through targeted Facebook ads. The LEP engagement period started February 21, 2019 and ended May 17, 2019. A total of 962 surveys were collected. Staff from the Transit Equity, Inclusion, and Community Affairs (TEICA) department distributed the surveys in-

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<sup>1</sup> Language groups that meet the Department of Transportation definition of LEP “Safe Harbor” thresholds. The thresholds are 5 percent of total population or 1,000 individuals, whichever is less.

person by attending an immense number of community events and meetings. Through built partnerships with key organizations and established relationships with community leaders, TEICA staff received support from the following key organizations: Latino Network, Verde, El Programa Hispano, Centro Cultural, Consulado Mexicano, Immigrant & Refugee Community Organization (Slavic Advisory Board), and Asian Health and Services Center. Staff contacted other community organizations and public entities working with Spanish speaking folks via telephone and via e-mail. TEICA staff shared the survey with key individual from the following organizations: Voz Worker Education Project, Consulado Mexicano, Mandos Mundo, Oregon Latino Action Agenda, Oregon Latino Health Coalition, OPAL, Educate Ya, American Friends Service Committee, Multnomah County Library, Multnomah County Health Department, Los Niños Cuentan, Gresham School District, Portland Public Schools ESL and Dual Language Immersion Programs, Hispanic Metropolitan Chamber of Commerce, Human Solutions, Central City Concern, Transition Projects, Virginia Garcia Clinic, Adelante Mujeres, Lara Media, Hispanic Pros, Rosewood Initiative, Archdiocese of Portland Ministerio Hispano, Portland ESL Network, etc.

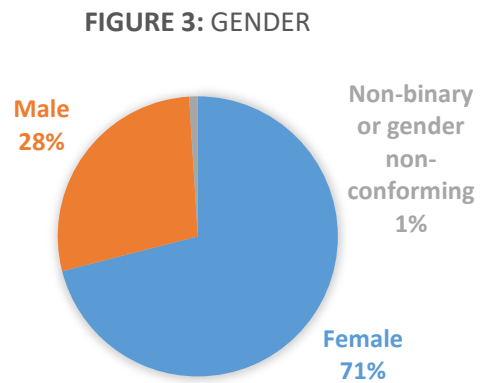
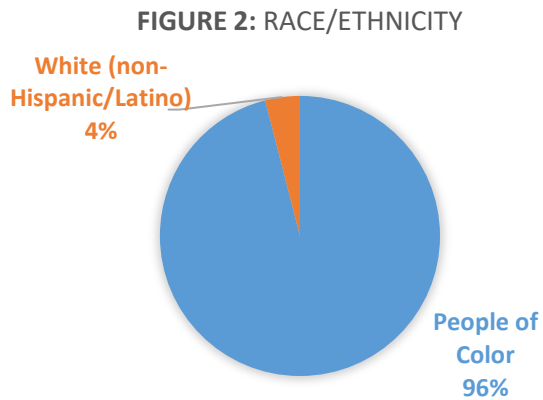
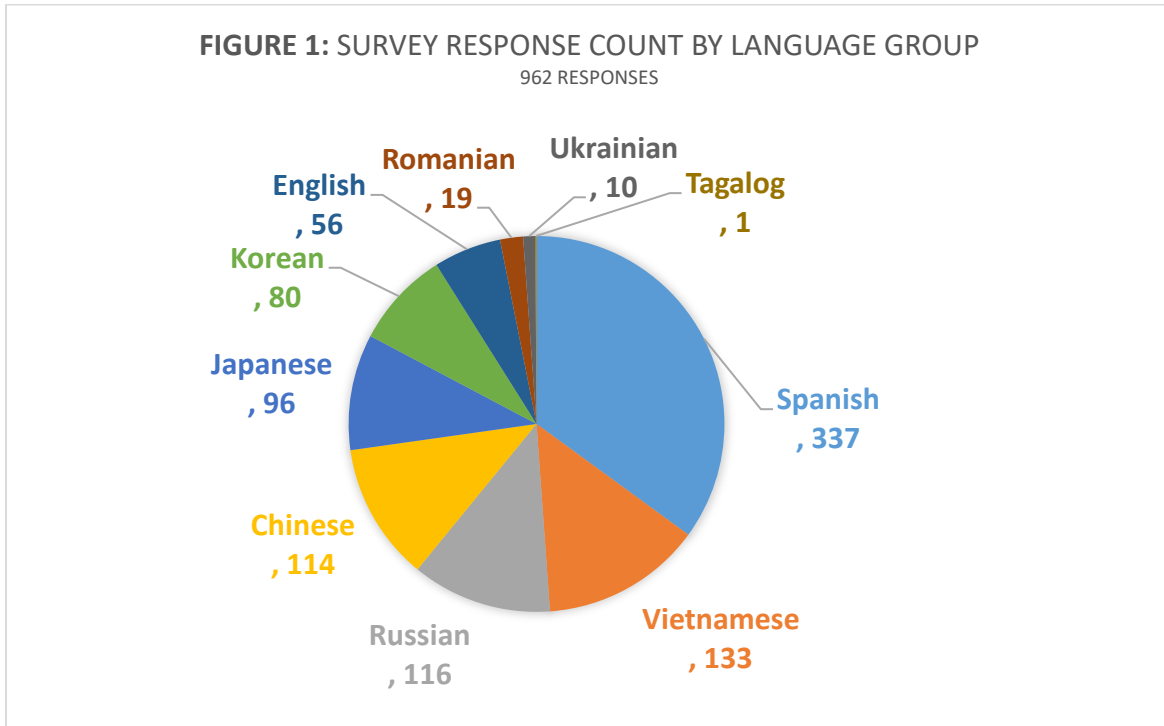
TEICA staff made presentations and surveyed Spanish-speaking parents participating at Latino Network Juntos Aprendemos Programs at the following schools:

- Ventura Park Elementary
- Mill Park Elementary
- Shaver Elementary
- Cesar Chavez Elementary
- Glenfair Elementary
- Tualatin Elementary
- Harvey Scott Elementary
- Rigler Elementary
- Tigard Elementary
- Bridgeport Elementary

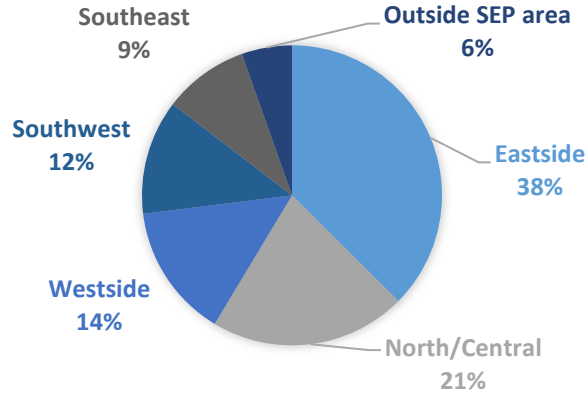
Staff also made presentations and surveyed participants in the Latino Network's program Soñemos Juntos, Bienestar's Equipo of Service Providers, El Programa Hispano Catolico, meetings at the Asian Health and Service Center and IRCO Senior Lunch as well as participants at a group gathering at the Baltazar Ortiz Center, Mill Park School Pantry, Madison High School Pantry, Shaver Food Pantry, and the Open Bible Harvest Share. Lastly staff participated with the survey at Consulado Mexicano's Ventatilla Financiera event, and at Cinco de Mayo in Portland.

## V. Survey Results and Findings

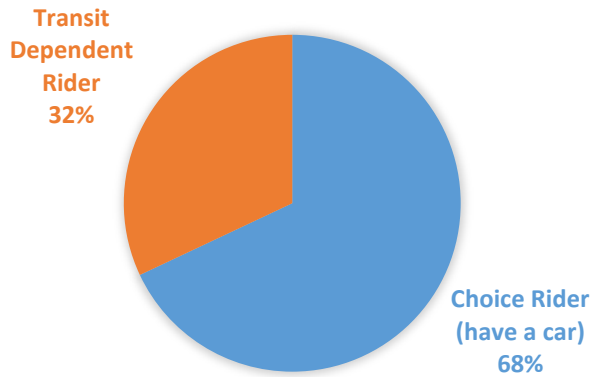
### A. Demographics



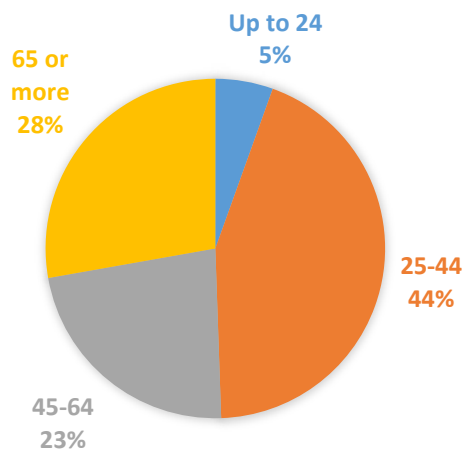
**FIGURE 4: LEP POPULATION BY SERVICE ENHANCEMENT PLAN AREAS**



**FIGURE 5: TRANSIT RIDER STATUS**

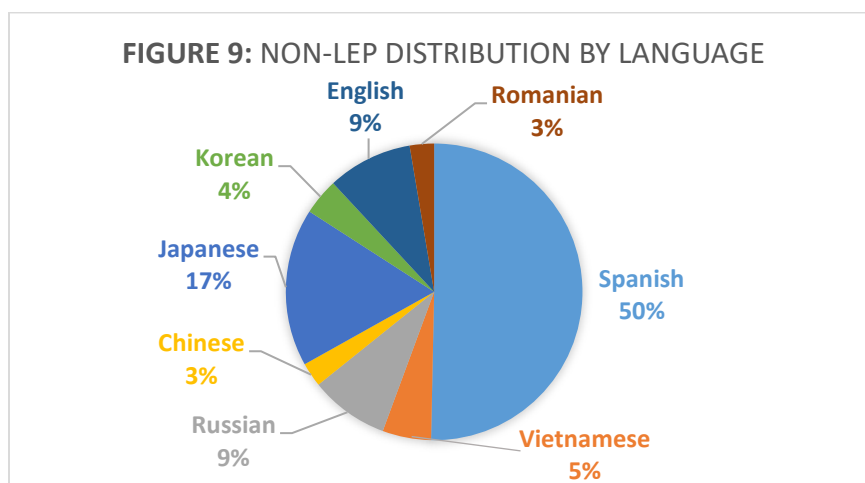
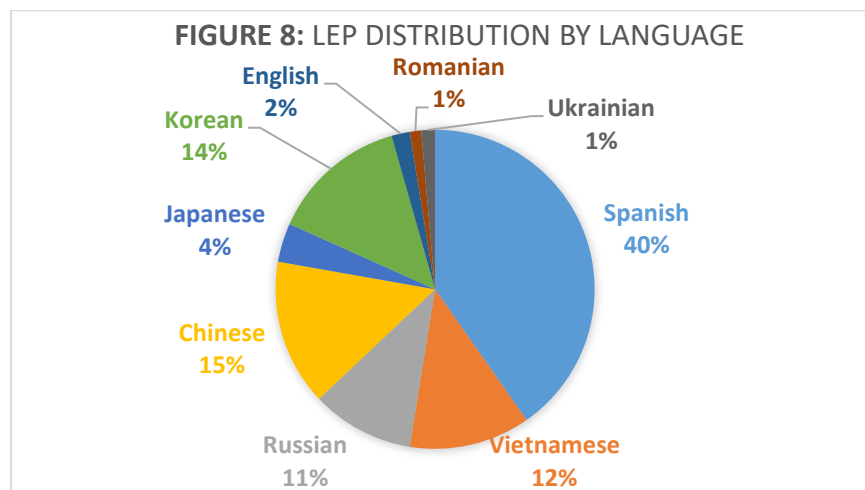
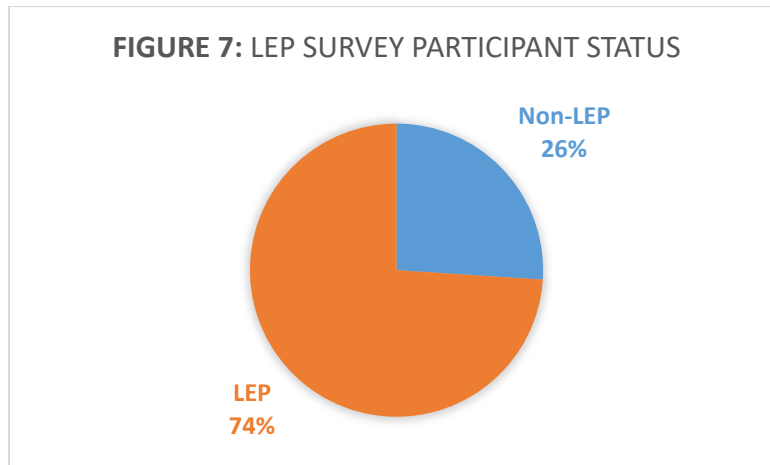


**FIGURE 6: AGE DISTRIBUTION BY LANGUAGES COMBINED**



## B. LEP Assessment

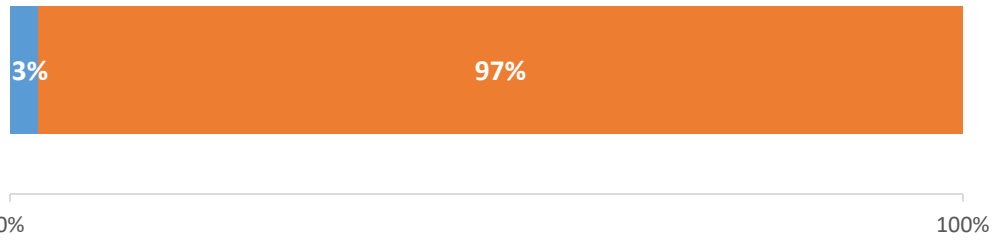
LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.





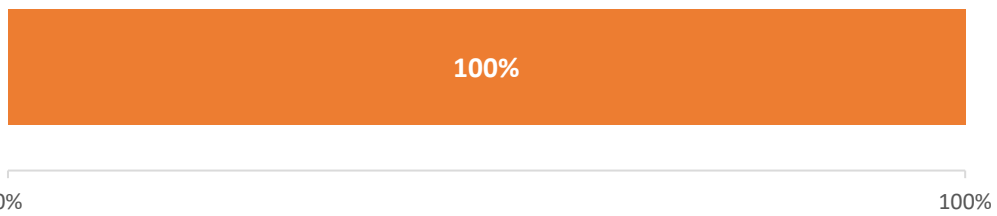
**FIGURE 10: HOW WELL DO YOU READ ENGLISH? (LEP)**

Very Well    Less Than Very Well



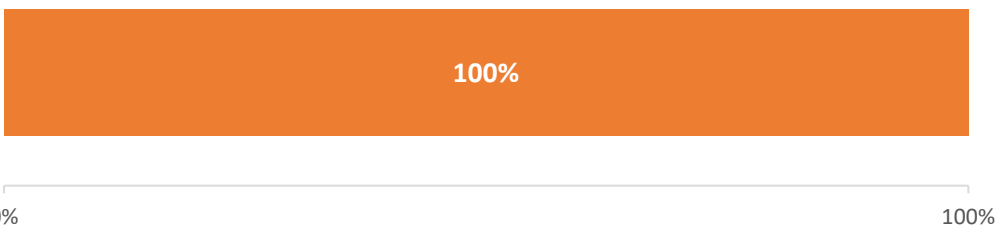
**FIGURE 11: HOW WELL DO YOU SPEAK ENGLISH? (LEP)**

Very Well    Less Than Very Well

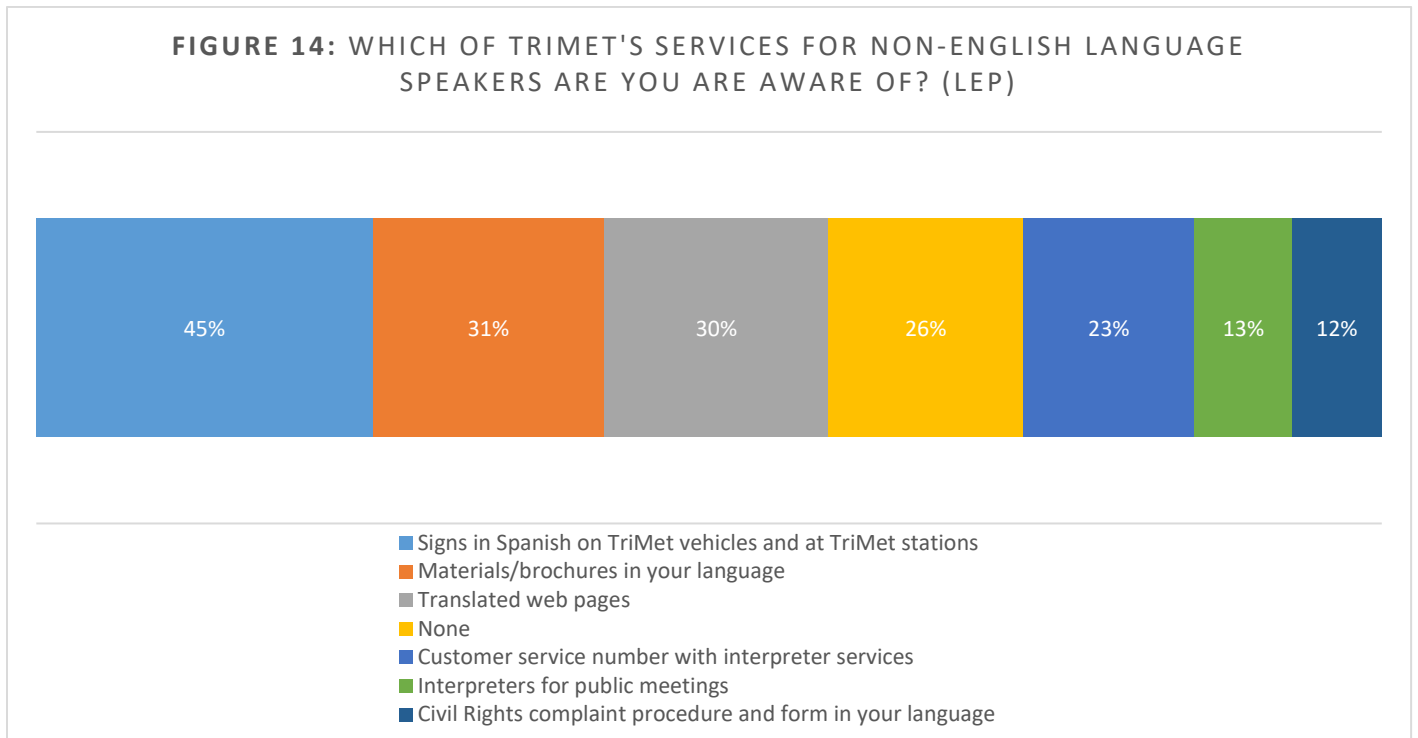
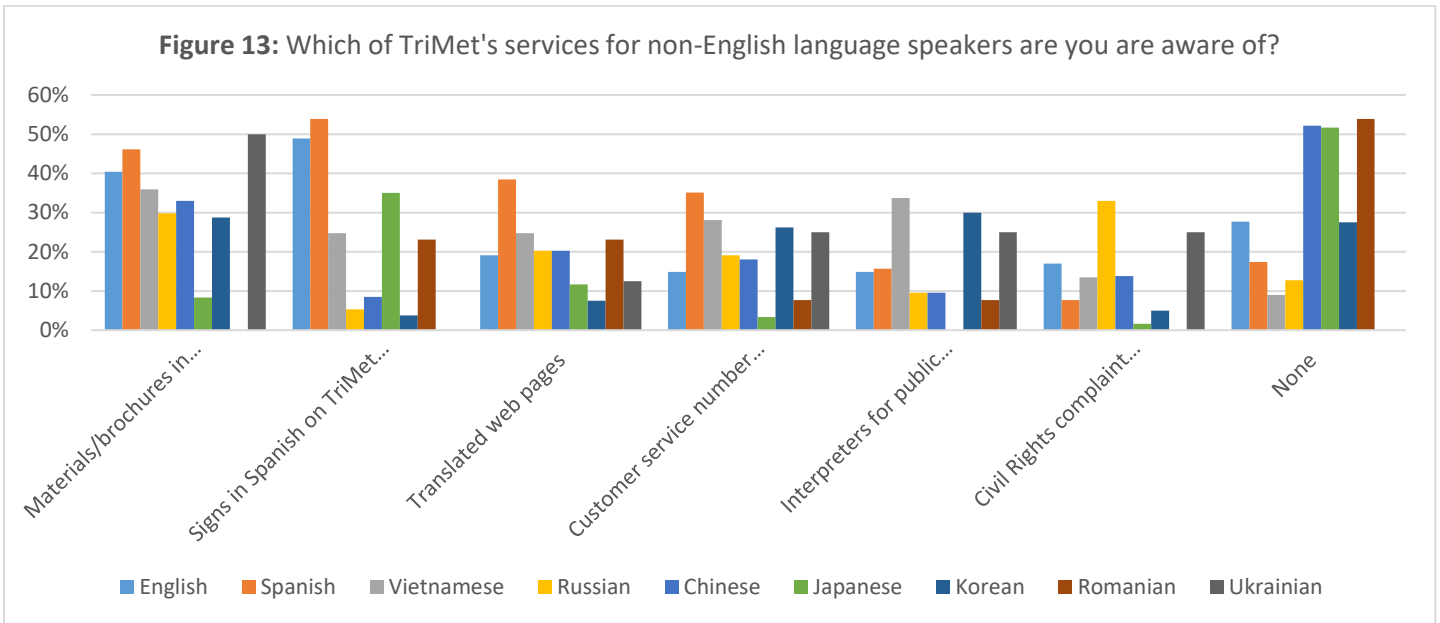


**FIGURE 12: HOW WELL DO YOU UNDERSTAND ENGLISH? (LEP)**

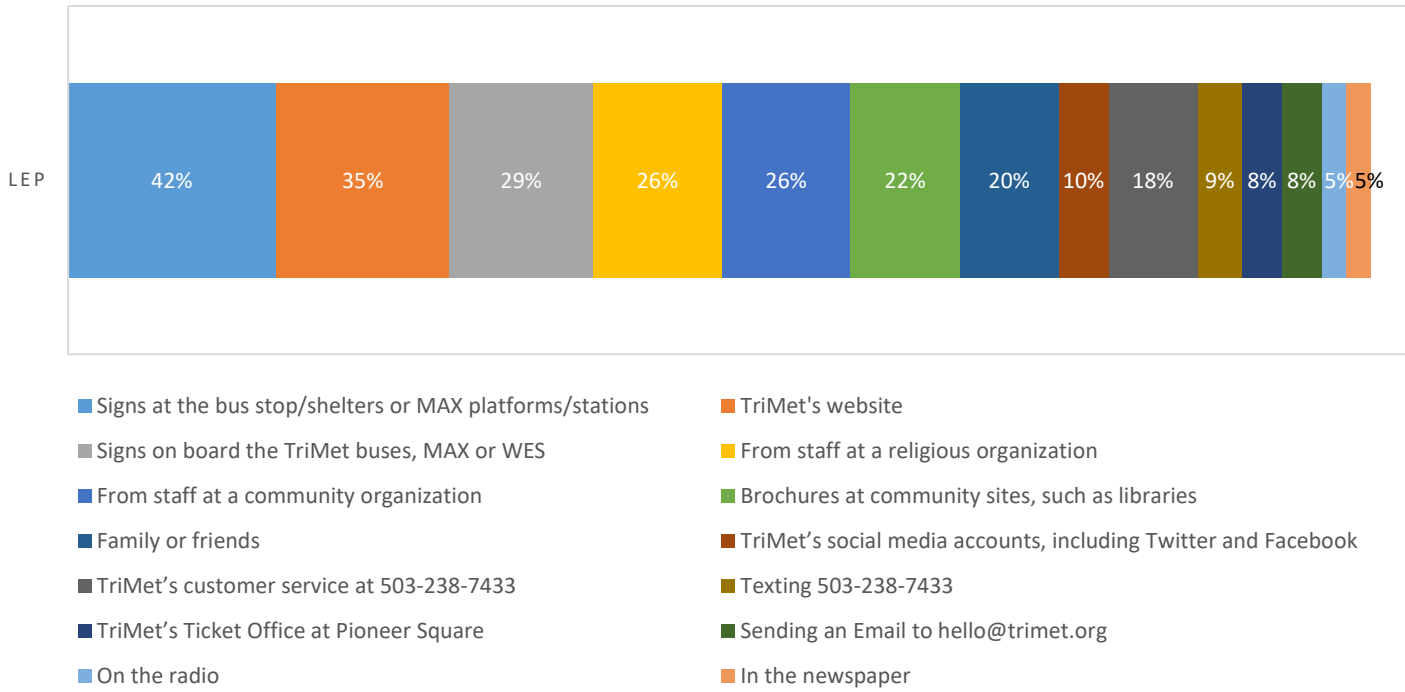
Very Well    Less Than Very Well



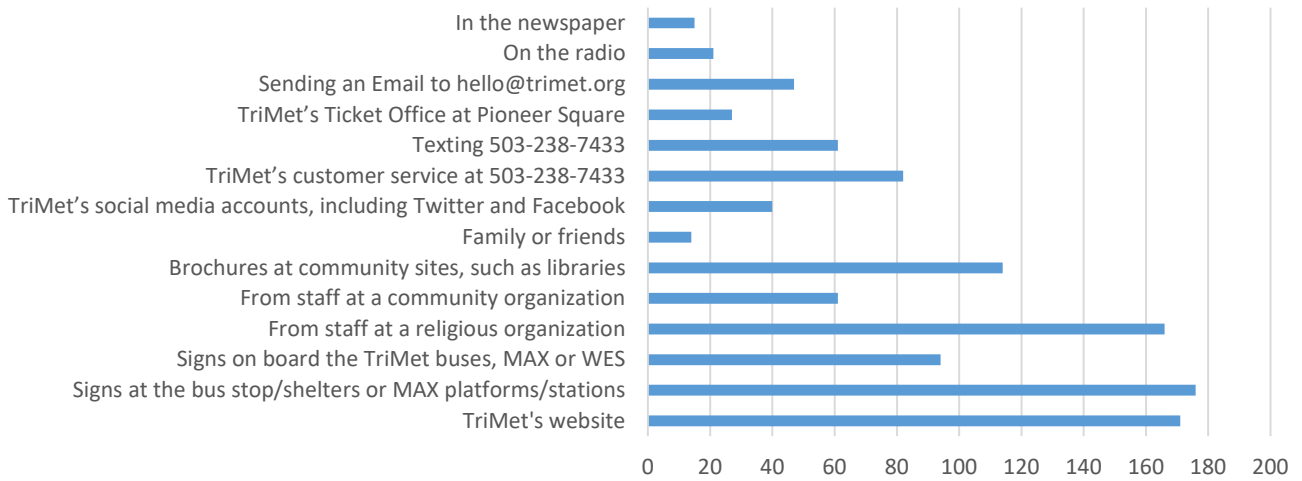
### C. Information Access and Language Services Awareness



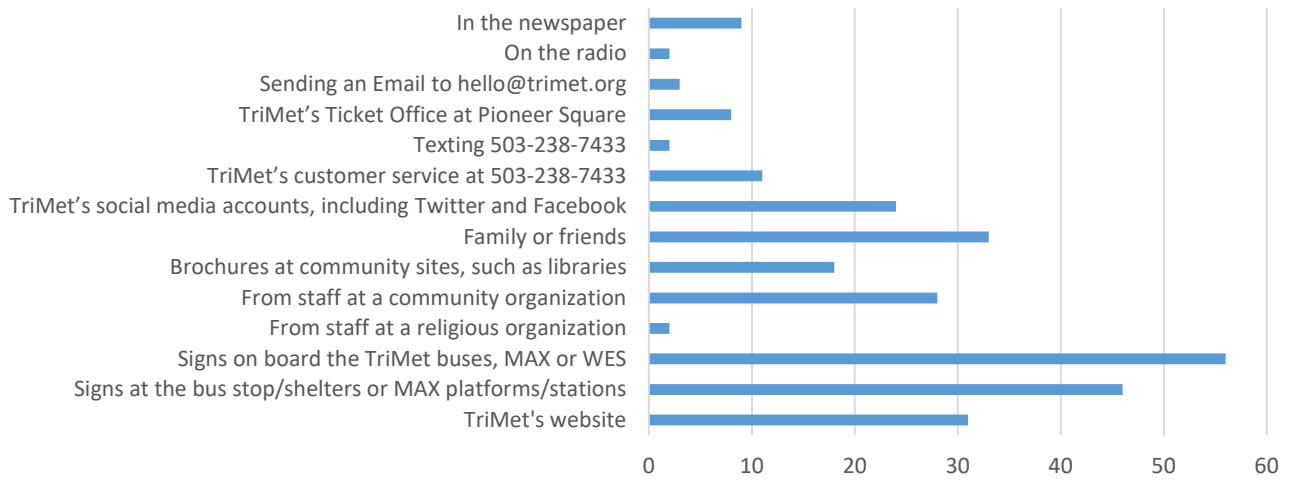
**FIGURE 15: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES?**



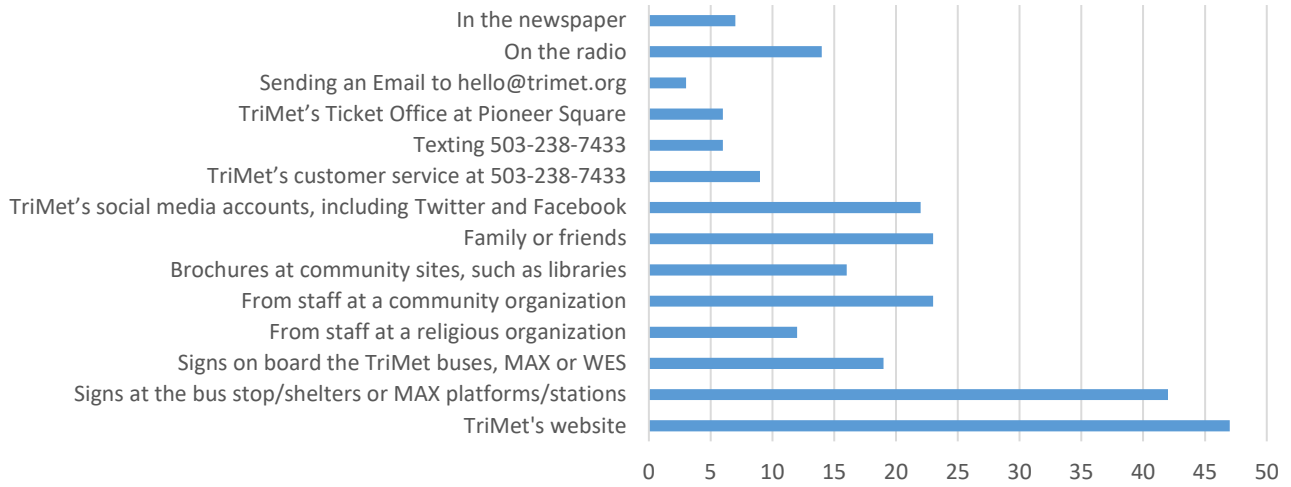
**Figure 16: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES? SPANISH**



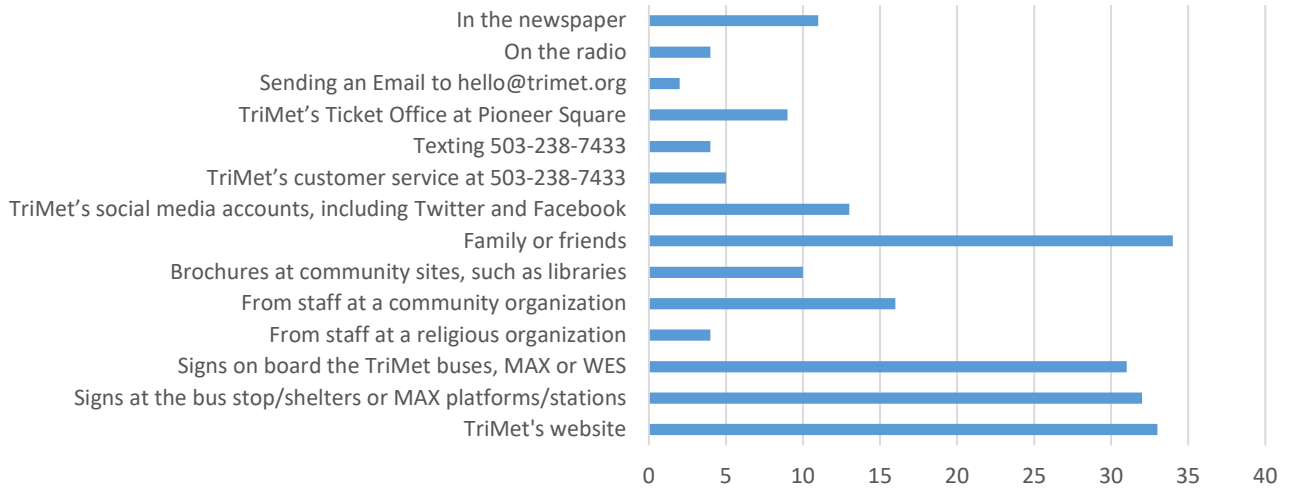
**Figure 17: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES?  
VIETNAMESE**



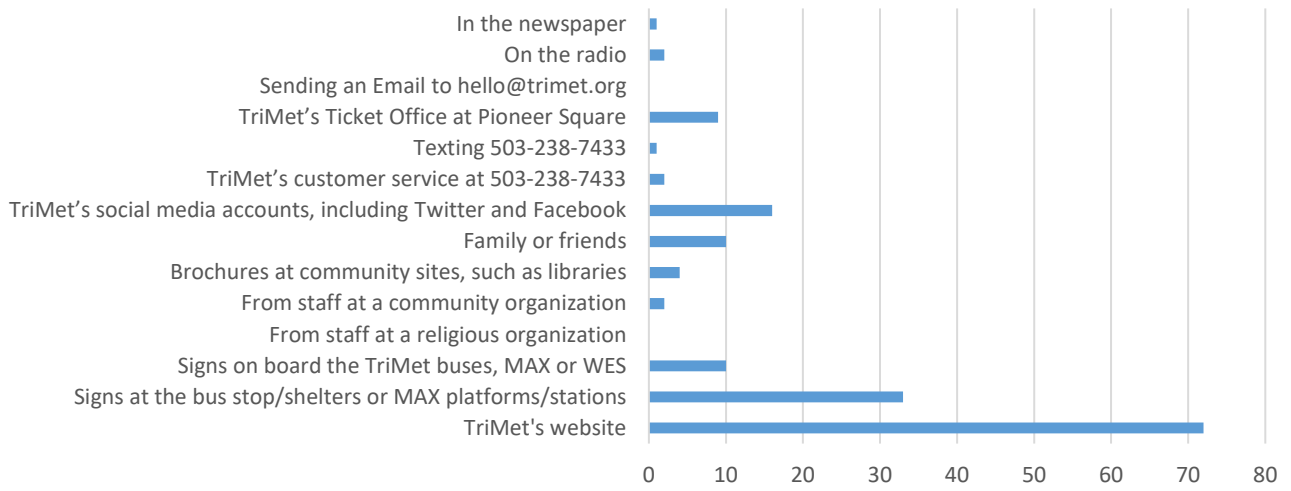
**Figure 18: RUSSIAN**



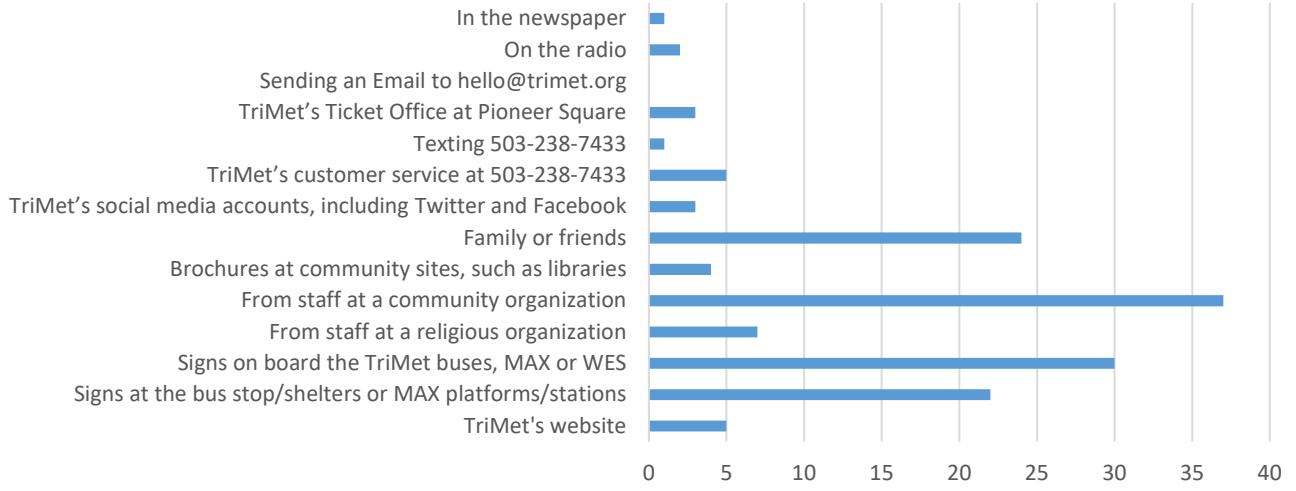
**Figure 19: CHINESE**



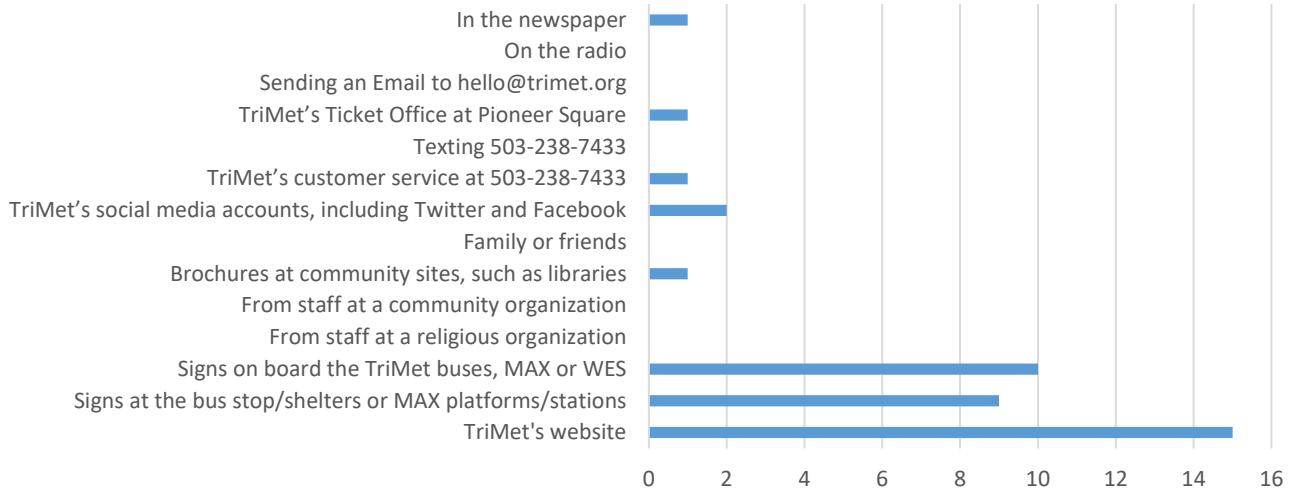
**Figure 20: JAPANESE**



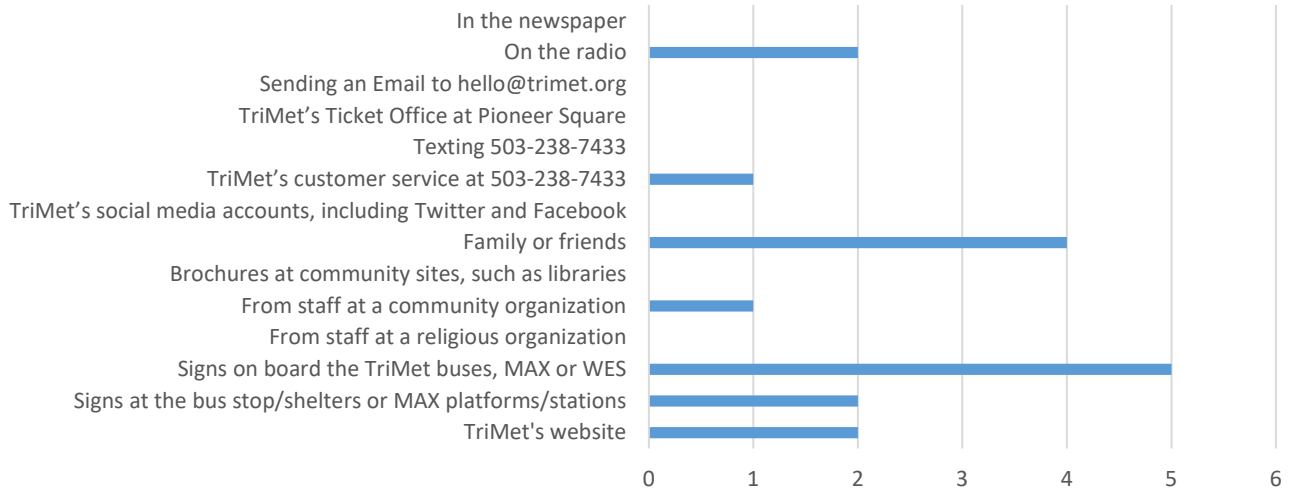
### Figure 21: KOREAN



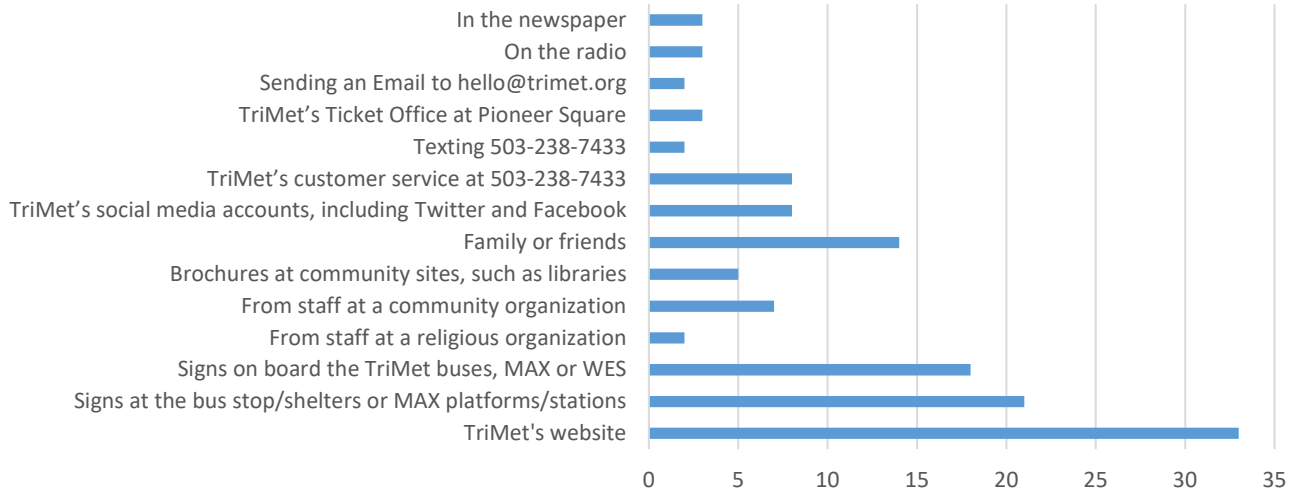
### Figure 22: ROMANIAN



**Figure 23: UKRAINIAN**

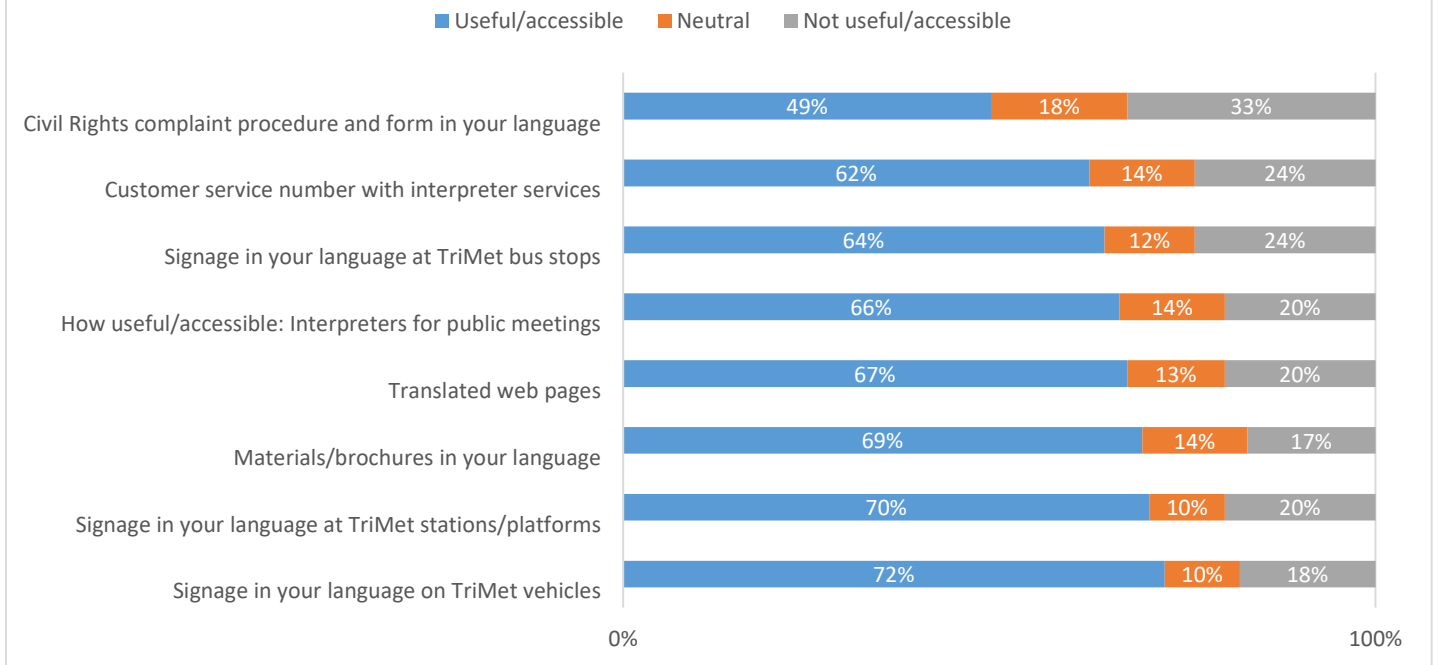


**Figure 24: ENGLISH**



## D. Usefulness/Accessibility

**Figure 25: How useful/accessible are TriMet's language access services?**



## E. Language Services Image Favorability

Participants were asked to select which of the images below best communicated that TriMet language services are available. A total of 558 responses were received.

**Figure 26**



(24%)



(8%)

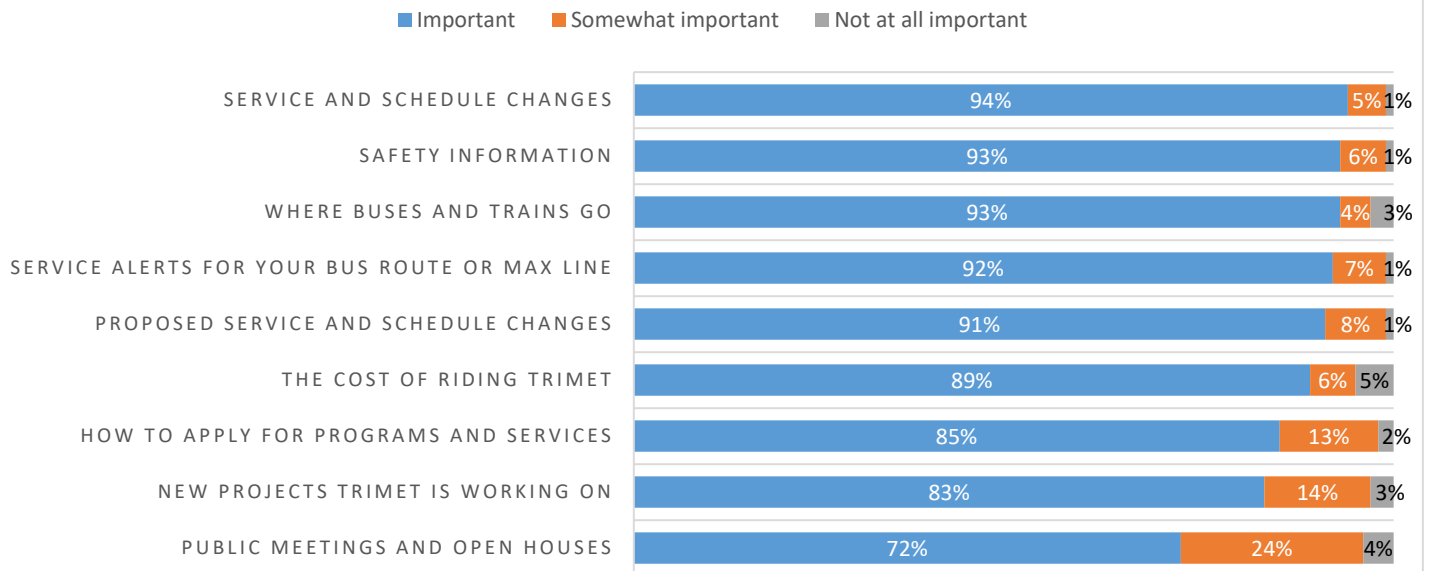


(68%)



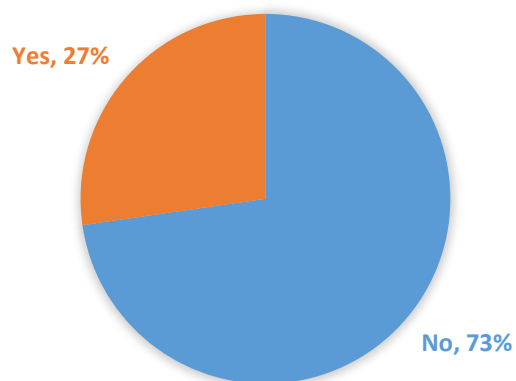
## F. Receipt of TriMet Information in Native Language by Level of Importance

**FIGURE 27: LEVEL OF IMPORTANCE OF RECEIVING ANSWERS (IN YOUR LANGUAGE) TO YOUR QUESTIONS IN THE FOLLOWING AREAS**

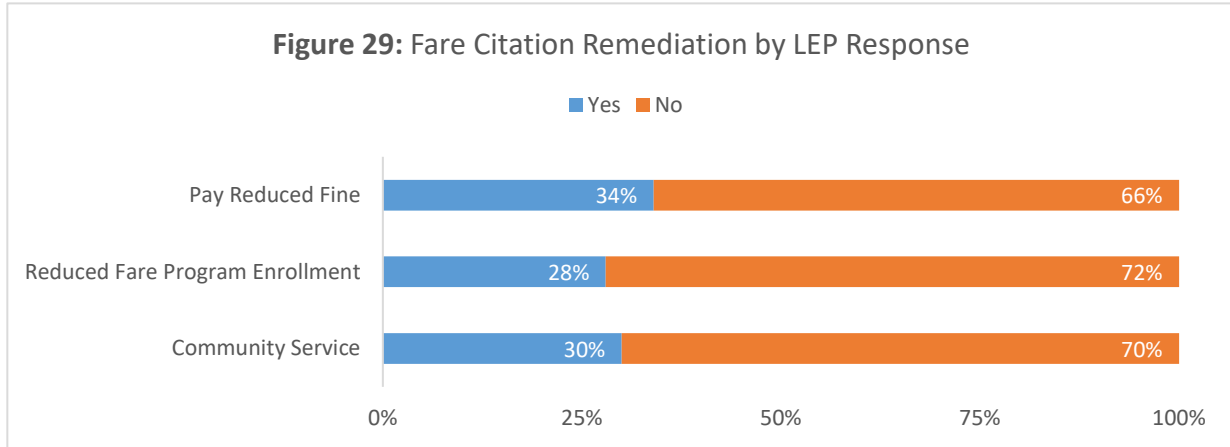


## G. Onboard Vehicle Emergency Awareness

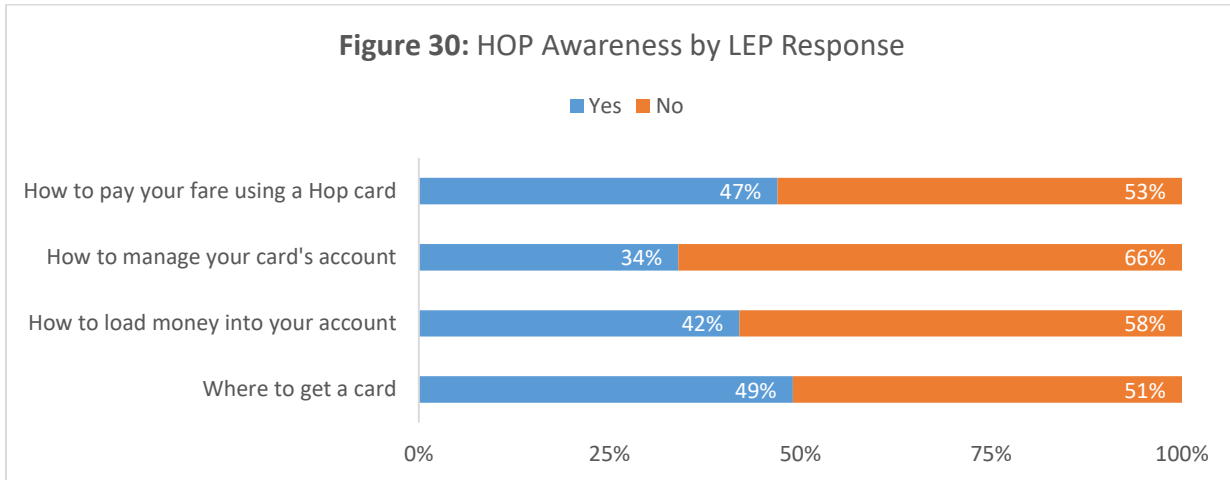
**FIGURE 28: DO YOU KNOW WHAT TO DO IN CASE OF AN EMERGENCY WHILE ONBOARD A TRIMET VEHICLE? (LEP)**



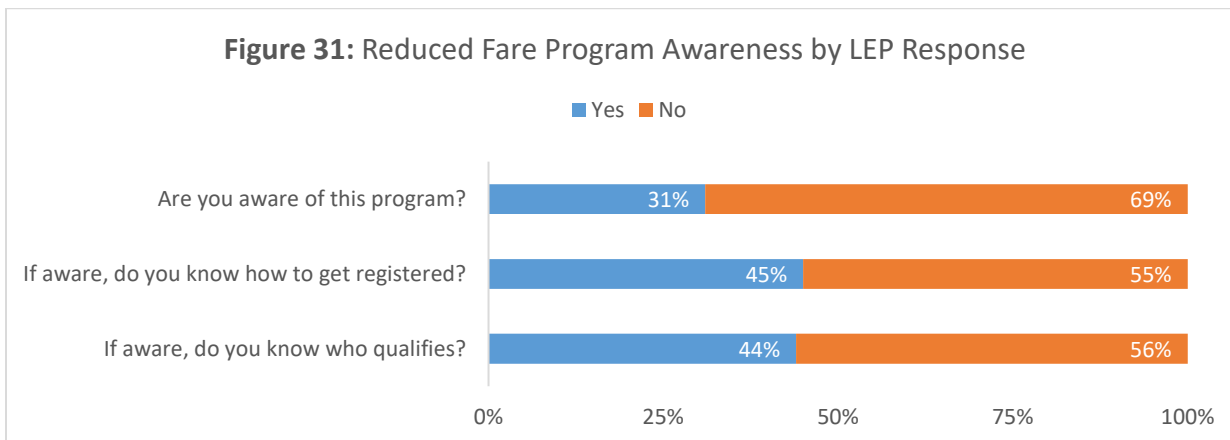
## H. Administrative Citation Awareness



## I. HOP Program Awareness



## J. Reduced Fare Program Awareness



## VI. Summary of Findings

Staff from the Department of Transit Equity, Inclusion, and Community Affairs launched a Language Access Services survey on February 21, 2019. The survey period ended on May 17, 2019. Surveys were distributed via in-person, direct email, and through targeted Facebook ads. Specifically, staff attended over 30 community partner events and engaged with over 900 event attendees. The type of events ranged from parent classes at various elementary schools, luncheons, advisory board meetings, low-income housing, food pantries, culturally-specific events, and places of worship.

The intention behind the surveys were to further understand the best ways to engage and inform limited English proficient populations about TriMet's programs and services, to gauge LEP populations awareness and accessibility of TriMet's current language access services, how and where they currently obtain information about these services as well as what is the best methods for receiving information.

Overall, there was a low to moderate awareness across all TriMet language services for non-English language speakers as in indicated in Figure 13. Alternatively stated, almost all language service category had less than 50% awareness for each language group with the exception of Spanish indicating that 54% have an awareness of "Signs in Spanish on TriMet vehicles and at TriMet stations". Furthermore, there is substantial differences between language groups awareness of TriMet's services. For instance, Romanian, Japanese, and Korean had a relatively high percentage of responses indicating they were not aware of any services that TriMet provides. Moreover, all language groups' awareness of "TriMet's translated web pages" and "Customer service number with interpreter services" were below 30% with the exception of Spanish at 38% for web pages and 35% for interpreter services.

As shown in Figure 14, the aggregation of LEP responses for the question "Which of TriMet's services for non-English language speakers are you aware of?" indicated that 45% were aware of "Signs in Spanish on TriMet vehicles and at TriMet stations", 31% were aware of "Materials/brochures in your language", and 30% were aware of "Translated web pages". The remaining categories were below 30 percent.

When asked, "How do you currently get information about TriMet's services", the top categories as shown in Figure 16 were "Signs at the bus stop/shelters or MAX platforms/stations", "TriMet's website", and "Signs on board TriMet vehicles". A subsequent question was asked how useful are TriMet's language access services?" Figure 26 depicts that the most useful and accessible was "Signage in your language on TriMet vehicles" and "Signage in your language at TriMet stations/platforms". Respondents were also asked, "How important you can get questions answered in your language". As noted in Figure 28, it is significantly important to receive answers across all questions, such as service and schedule changes, safety information, where buses and trains go, and service alerts.

Survey respondents were asked about their awareness of onboard vehicle emergency procedures as well as TriMet programs, such as administrative citation process, the new electronic fare system called Hop Fastpass™, and the new reduced fare program. As indicated in Figures 29-34, LEP respondents had a moderately low awareness of these programs or what to do if they had to respond to an emergency onboard a TriMet vehicle.

Lastly, the Language Access Survey provided participants with the opportunity to give response through several open-ended questions. There was an overwhelming amount of feedback across various languages and communities requesting more digital interaction in their language. The most popular platforms were

social media (Facebook), email, web applications and websites as mediums that can help those communities stay up to date with TriMet's service and programs in their own primary language. Another popular theme amongst languages was having materials and presentations available in community based organization. This was particularly true with senior populations from the Korean community.

TriMet staff also identified three major common themes when asked about ways to improve safety on the system: 1) increase operator training, particularly in learning how to interact with limited English proficient customers; 2) increase security on the system by having more staff presence and; 3) increase surveillance on the system. When asked how to make customers feel more welcomed on the system feedback requested that correct translations were highly important as well as seeing more diverse and bilingual TriMet staff.

## VII. Recommendations

Develop and implement the initiatives below with a high degree of public involvement to ensure that TriMet is providing the needed information in areas where it is accessible to various language groups.

Initiatives should include:

- Language Assistance brand and awareness campaign that focuses on TriMet infrastructure (On-board and at stations). This could involve the deployment of language specific "Ask Me" staff in addition to signage.
- Create resource and information hubs at CBO locations. Resource select partners through the Multicultural Outreach Contract or other opportunity.
- Improve digital engagement and information sharing. Continue to explore and invest in targeted social media promotions and information sharing.
- Identify what information people are looking for and in what places they look through further public involvement.
- Use the available spaces on the TriMet system to create information that LEP people can access in their language.
- Develop and test materials with target audiences before mass distribution.
- Build out staff training regarding how to serve LEP riders and the resources available.
- Focus on educational campaigns for fare administration, LIF, and Hop to create better market saturation for programs.
- Conduct more frequent and targeted surveys to explore the effectiveness of information strategies in achieving increased awareness of issues such as safety and security, Hop, and the Low Income Fare.
- Hire more bilingual and/or bicultural staff.
- Institute more regularly scheduled and ongoing focus groups and other opportunities for LEP community members to provide more in-depth feedback.
- Formalize an external Community Advisory Committee and allocate resources to support it.

Attachment 1: Language Services Survey Template



**As part of our commitment to access, equity, and inclusion, TriMet is conducting a survey to help update our Language Access Plan.**

This plan outlines how TriMet will address the needs of riders whose primary language is not English. TriMet is committed to a public transportation system where all are welcome. Your participation will help us achieve this goal.

**1. How do you currently get information about TriMet’s services?**

- TriMet’s Customer Service at 503-238-7433
- TriMet’s website
- TriMet’s Ticket Office at Pioneer Square
- Sending an email to **hello@trimet.org**
- Texting 503-238-7433
- TriMet’s social media accounts, including Twitter and Facebook
- Signs at the bus stop/shelters or MAX platforms/stations
- Signs on board the TriMet buses, MAX or WES
- On the radio
- In the newspaper
- Brochures at community sites, such as libraries
- From staff at a community organization
- Family or friends
- From staff at a religious organization
- Other (please specify) \_\_\_\_\_

**2. What are the best ways for TriMet to share information with you?**

\_\_\_\_\_

**3. Which of TriMet’s services for non-English Language speakers are you aware of? Check all that apply.**

- Customer service number with interpreter services
- Translated web pages
- Interpreters for public meetings
- Materials/brochures in your language
- Signage in Spanish on TriMet vehicles and at TriMet stations
- Civil Rights complaint procedure and form in your language
- Other (please specify) \_\_\_\_\_

**4. On a scale of 1 to 5, with 5 being the highest, rank how useful/accessible these services are to you.**

Customer service number with interpreter services	1	2	3	4	5
Translated web pages	1	2	3	4	5
Interpreters for public meetings	1	2	3	4	5
Materials/brochures in your language	1	2	3	4	5
Signage in your language on TriMet vehicles	1	2	3	4	5
Signage in your language at TriMet stations/platforms	1	2	3	4	5
Signage in your language at TriMet bus stops	1	2	3	4	5
Civil rights complaint procedure and form in your language	1	2	3	4	5

**5. In addition to providing services in your language, what else can TriMet do to make you feel welcome and included?**

\_\_\_\_\_

**6. TriMet is looking for an image that to communicates that languages services are available. Which of the images below communicates that most clearly?**



**7. How important it is that you can get information or answers to questions about each of the following from TriMet in your primary language?**

	Not at all	Somewhat Important	Important	Very Important
The cost of riding TriMet	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where buses and trains go	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Service and schedule changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Proposed service and schedule changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Service alerts for your bus route or MAX line	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New projects TriMet is working on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public meetings and open houses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How to apply for programs and services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**8. How can TriMet improve your safety while onboard our buses and trains?**

\_\_\_\_\_

9. Do you know what to do in case of an emergency while onboard a TriMet vehicle?  Yes  No

10. Fare is required to ride TriMet vehicles. If you receive a citation for riding without fare, do you know about the following options to resolve it?

Community Service  Yes  No Pay Reduced Fine  Yes  No  
Enroll in a Reduced Fare Program  Yes  No Request an Appeal Hearing  Yes  No

11. We recently launched a new electronic fare system called Hop Fastpass. Do you know the following?

Where to get a card  Yes  No How to manage your card's account  Yes  No  
How to load money into your card  Yes  No How to pay your fare using a Hop card  Yes  No

12. Since July 2018, TriMet began offering a reduced fare program for riders with lower incomes. This program lowers fares by 50% to 72%.

Are you aware of this program?  Yes  No Do you know how to get registered?  Yes  No  
Do you know who qualifies (eligibility requirements)?  Yes  No

13. What is your primary language?

English  Українськи (Ukrainian)  Română (Romanian)  
 Español (Spanish)  عربي (Arabic)  Somali (Somali)  
 Tiếng Việt (Vietnamese)  Tagalog (Tagalog)  Other (please specify) \_\_\_\_\_  
 中文 (Chinese)  日本語 (Japanese)  
 Русский (Russian)  ខ្មែរ (Mon-Khmer, Cambodian)  
 한국어 (Korean)  فارسی (Persian-Farsi)

14. How well do you read, speak, or understand English?

	Very Well	Well	Not Well	Not at All
Read	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Write	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Understand	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15. How many people are in your household (including you)?  1  2  3  4 or more

16. What was your total annual household income before taxes in 2018? (check one)

Under \$18,209  \$37,650 to \$44,129  \$63,570 or more  
 \$18,210 to \$24,689  \$44,130 to \$50,609  Don't know  
 \$24,690 to \$31,169  \$50,610 to \$57,089  
 \$31,170 to \$37,649  \$57,090 to \$63,569

17. How often do you ride TriMet?

Every day  About once a week  Once a month  
 A few times a week  A few times a month  Less than once a month

18. Do you normally have access to car at your place of residence?  Yes  No

19. How many working vehicles do you have access to?  1  2  3  4 or more

20. What is your zip code? \_\_\_\_\_

21. Are you:

African American/Black  Caucasian/White  Multi-racial/bi-racial  
 Asian/Pacific Islander  (non-Hispanic/Latino)  Other (please specify) \_\_\_\_\_  
 Alaska Native/American Indian  Hispanic/Latino

22. How old are you?

Under 18  35-44  65+  
 18-24  45-54  
 25-34  55-64

23. What is your gender?

Male  Non-binary or  Other (please specify) \_\_\_\_\_  
 Female  Gender non-conforming

24. If you would like to receive periodic updates on TriMet's Language Access Plan or if you would like to participate in future surveys, please provide your email address below.

\_\_\_\_\_  
Email Address

Thank you for completing this survey.

## Appendix B: Bus Operator Intercept Survey Report





## **TRIMET LIMITED ENGLISH PROFICIENCY RESEARCH**

### **BUS OPERATOR INTERVIEWS**

**FALL 2016 & FALL 2018**

## **SUMMARY**

### **Background & Methodology**

As part of TriMet's effort to evaluate access to transit for all members of the community, intercept surveys were conducted with bus operators. Since bus operators are often the first contact Limited English Proficiency (LEP) passengers have with TriMet, this research was designed to find:

- Learn how operators communicate with LEP passengers
- Solicit their ideas for better ways to communicate with LEP passengers

To this end, TriMet's Marketing Information Department conducted a total of 190 operator interviews at Center Street Garage during the fall 2016 schedule sign-up. Another survey was conducted by TriMet's Transit Equity, Inclusion, and Community Affairs department during the fall 2018 schedule sign-up with 225 operators. Results from 2016 and 2018 are compared below, along with some subgroup analysis. Included in this report are findings from 2005 when the survey was first conducted as well as the second survey in 2011

The interviewing times for each survey periods were spread evenly throughout the two-week sign-up process to ensure operators with varying lengths of service were represented.

### **Respondent Profiles**

- Twenty-five percent of 2018 respondents had been employed with TriMet up to two years, 49% between two and five years, and 26% over five years. Operators from 2016 had less length of service (4.1 average) than those in 2018 (4.6 average).
- Over two-thirds (72%) of 2018 respondents were full-time operators and the rest (28%) were part-time. Full-time operator status resides with those operators working two or more years at TriMet.
- Most (58%) of the 2018 respondents worked at Center Street garage followed by Powell (23%) and then Merlo (19%).

## Findings

- Operators were asked which routes they had driven in the past year, where they had most often encountered LEP passengers asking for information and how often.

Operators encountered LEP passengers on about 59% of the bus routes in the system. Routes most often mentioned in both 2016 and 2018 were:

- Line 57- Forest Grove. This route serves Forest Grove, the area with the region's highest concentration of Spanish speakers.<sup>1</sup>
- Line 12- Barbur. This is a long route with one end in Sherwood, another area with a large Spanish speaking population.<sup>1</sup>
- Line 4-Division, has one end of the route in Gresham, an area with a high concentration of Spanish speakers, as well as Russian, Ukrainian, Tagalog, and Vietnamese.<sup>1</sup>
- Line 72-Killingsworth/82<sup>nd</sup> was a top mention in 2011 and 2016. This route has one end in Gresham, again an area with a high concentration of Spanish speakers, as well as Romanian, Vietnamese and Chinese.<sup>1</sup> The Green Line MAX, which opened in 2010, connects to Line 72.
- Line 6 – Martin Luther King Jr Blvd. This route serves Hayden Island and North Portland, an area with a high concentration of Chinese, Vietnamese speakers, as well as Romanians.
- Line 77 – Broadway/Halsey. On one end, this route serves outer NE Portland, Fairview, Wood Village and Troutdale, which has moderate concentrations of Tagalog, Ukrainian, Russian, and Arabic speaking populations.
- Line 73 – 122<sup>nd</sup> Ave. This route runs between Parkrose/Sumner Transit Center and SE 94th & Foster, serving a high concentration of Spanish speakers, as well as Ukrainian, Vietnamese, Russian and Chinese.
- Line 76 – Beaverton/Tualatin. This route runs between Tualatin, Tigard, Washington Square and Beaverton, serving a high concentration of Spanish, Tagalog, and Persian speakers.
- Line 99 – Macadam/McLoughlin. On one end, this route serves Oregon City, an area with a high concentration of Ukrainian and Russian speakers.

As for the number of times LEP passengers asked for information, there was a great range depending upon the route. For some routes information requests were only once a week, for others it was as high as 20 times/day.

- Three questions were asked to assess how difficult communicating with LEP passengers was for operators.
  1. The first question asked in general how easy or difficult it was to communicate with LEP passengers. Nearly one-half of the operators interviewed said it was difficult; either *very* (12%) or *somewhat* (33%) difficult.
    - Among the operators who spoke another language, slightly less indicated it was difficult (44%).
    - 2011 operators found it less difficult (59%) than those in 2005 (66%).
    - Among the 2011 operators with up to 1 year length of service, only 45% said it was difficult.

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<sup>1</sup> 2012-2016 American Community Survey 5-year Estimates

2. Next a question was asked to find out how difficult communicating with LEP passengers was when *compared to other operator job issues*. In this case responses came in as being less difficult, on average 3.9 on a 10-point scale where 10 was very difficult. This question was not asked in 2016 or 2018.

- 2011 operators found it more difficult than those in 2005, an average of 4.2 and 3.7 respectively.
- Those who spoke another language found it less difficult, an average of 3.6.

3. The third question was open-ended and a different version of the question was asked in 2005 and 2011. This question was not asked in 2016 or 2018.

a. 2005. Operators were asked about the most difficult issues they faced in their job. Only three percent mentioned communicating with LEP passengers as one of the most difficult issues they faced.<sup>2</sup>

b. 2011. Operators were asked about the most difficult *communication* issues they faced in their job. For this the top mention was language problems in general, 27%.

- Operators were asked what types of questions were most often asked by LEP passengers. In this open-ended question, the top responses were *how to get to a destination* (73%), *which bus to take* (45%) & *fares* (17%). Similar responses were present across all surveys.
- When asked how they communicate with LEP passengers, operators mentioned a variety of strategies including *using hand gestures/sign language* (25%), using English/no other language (25%), *getting them to write down an address* (13%), depends on how well they speak English (9%), non-verbal communication (8%), phrases/key words (6%), listen closely (6%), *ask other passengers* (4%), and *speaking slowly* (2%).
  - There are stark differences compared to 2011 including: *asking other passengers for help* (41%), *using hand gestures/sign language* (29%), *getting them to write down an address* (14%), *pointing to fare signs* (13%), *speaking slowly* (12%), *alerting them to their stop* (12%), *using diagrams or maps* (11%), and *listening closely* (11%).
- Operators were asked if they felt equipped to communicate with passengers who speak limited or no English. Only 37 percent of the 2018 Operators surveyed said yes compared to 56 percent in 2016. The introduction of the “Depends” category in 2018 may have impacted the response selection (i.e., there was no “Depends” category to select in 2016).
- Less than half (38%) of the 2018 operators compared to 50 percent in 2016 were aware of different materials, services or tools TriMet uses to communicate with LEP passengers. This was significantly higher in 2005 and 2011 (92% vs. 74%, respectively).

Unaided Materials/services/tools cited included:

- *Language translation at 238-RIDE* (37%). 2016 had the highest mention (48%). There were lower mentions in 2005 than 2011 (5% vs. 17%, respectively).
- *Channel cards in Spanish* (20%). It was slightly higher in 2016 at 27%. There were lower mentions in 2011 (17%).
- *Website* (16%). It was higher in 2016 at 21%. There were lower mentions in 2005 and 2011 (4% vs. 10%, respectively).
- *Bus/MAX announcements in Spanish* (10%). Lower mentions in 2005, 2011, and 2016 (4%, 11%, and 9%, respectively). During the time between 2005 and 2011 Automatic

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<sup>2</sup> The top six most difficult issues given by 10% or more of the operators were: passengers (38%), traffic (31%), schedules (20%), fare issues (16%), other drivers (12%), and safety/security/danger (10%).

Stop Announcements were installed on all buses which included Spanish language instructions.

- *How to Ride* brochure (8%). It was higher in 2016 at 17%. For 2005 respondents this was a higher mention than in 2011 (34% vs. 10%). Between 2005 and 2011 literature racks on the buses were removed which contained these brochures.

Aided (Read from a list) Materials/services/tools cited included:

- *Bus/MAX announcements in Spanish* (80%).
- *Channel cards in Spanish* (67%).
- *How to Ride* brochure (80%).
- *Website* (27%).
- *Language translation at 238-RIDE* (25%).
- *How to Ride* brochure (22%).
- *Hop multilingual brochure* (19%).

### **Discontinued Tools**

- *Paddle with translations* (49%) for 2011. This was a high visibility item for operators as it stayed on the bus near the driver's seat. It was discontinued before 2005, but 80% of those in 2005 mentioned it.
- *Farebox Spanish* (16%) in 2011. 2005 had higher mentions (22%). This item which gave basic words in Spanish was discontinued after 2005. A shorter one pager developed in 2011 by Operations Training staff was not referenced.
- When asked if TriMet could do something to help operators communicate with LEP passengers, 58% answered *Yes*, and offered a number of suggestions such as *language classes at TriMet* (32%), *brochures/schedules/maps in other languages* (24%), and *announcements/signage* (6%). In 2018, language classes were offered as part of the E3 Program.
  - In 2011, when asked if TriMet could do something to help operators communicate with LEP passengers, 62% answered *Yes*, and offered a number of suggestions such as *language classes at TriMet* (36%), *list of phrases with translations* (16%), *translators on the bus or available so operators could phone TriMet* (11%), and *brochures/schedules/maps in other languages* (8%). After 2005, tuition reimbursement from TriMet was discontinued due to budget cuts.
- More than two-thirds (68%) of the operators interviewed mentioned they had not received any training on how to communicate with LEP passengers. This was lower in 2016 (54%).

Of those asked if they would like to receive training, 78% mentioned yes.

- Overall 36% of the operators interviewed speak another language at some level, either fluently or some words. There were 38% in 2016.

Among those who said they spoke another language, most spoke *Spanish or some Spanish* (68%) followed by *German/some German* (8%), and *French/some French* (4%). In 2018, Operators employed with TriMet more than five years had the highest concentration of those who spoke some level of Spanish — 94%. Whereas in 2016, Operators employed with TriMet between one to five years had the highest concentration of those who spoke some level of Spanish — 82%. Compared to 2005 and 2011, Operators employed with TriMet up to one year had the highest concentration of those who spoke some level of Spanish — 89% in 2005 and 86%, respectively.

## Conclusions and Recommendations

Operators in this project indicated varying degrees of difficulty communicating with LEP passengers. Factors contributing to their difficulties include the route driven and the proportion of LEP passengers encountered, operator experience, ability to speak at least *a few words* of a foreign language, and awareness and use of TriMet foreign language materials.

Based on the results of this work, it is shown that LEP training, knowledge of TriMet LEP materials and tools, and knowledge of another language, especially Spanish, makes it easier for operators to communicate with LEP passengers. Therefore it is recommended that TriMet take the following steps to assist operators and, ultimately, LEP customers:

1. Offer a dedicated training class on how to communicate with LEP customers and have all front-line employees attend.
2. Offer incentives to increase second language proficiency in TriMet's operator force.
3. Operators are most aware of materials when they are used as part of their daily routine. Farebox Spanish, paddles with translations, How To Ride brochures in racks on vehicles are no longer being used. Work with operators to design new language assistance materials to that will be more practical and useful in their interactions with LEP customer. The reintroduction of paddles with translations should be considered as this was the most frequented tool for operators in 2011.
4. Work with a panel of LEP customers to design new language assistance materials, which will be of most use to them while riding TriMet vehicles.
5. Have more written translated placards/stickers/channel cards in the top 5 LEP language groups.
6. Testing translation phone applications
7. Hire bilingual staff

## Appendix C: Bus Operator and Field Operations Survey Findings

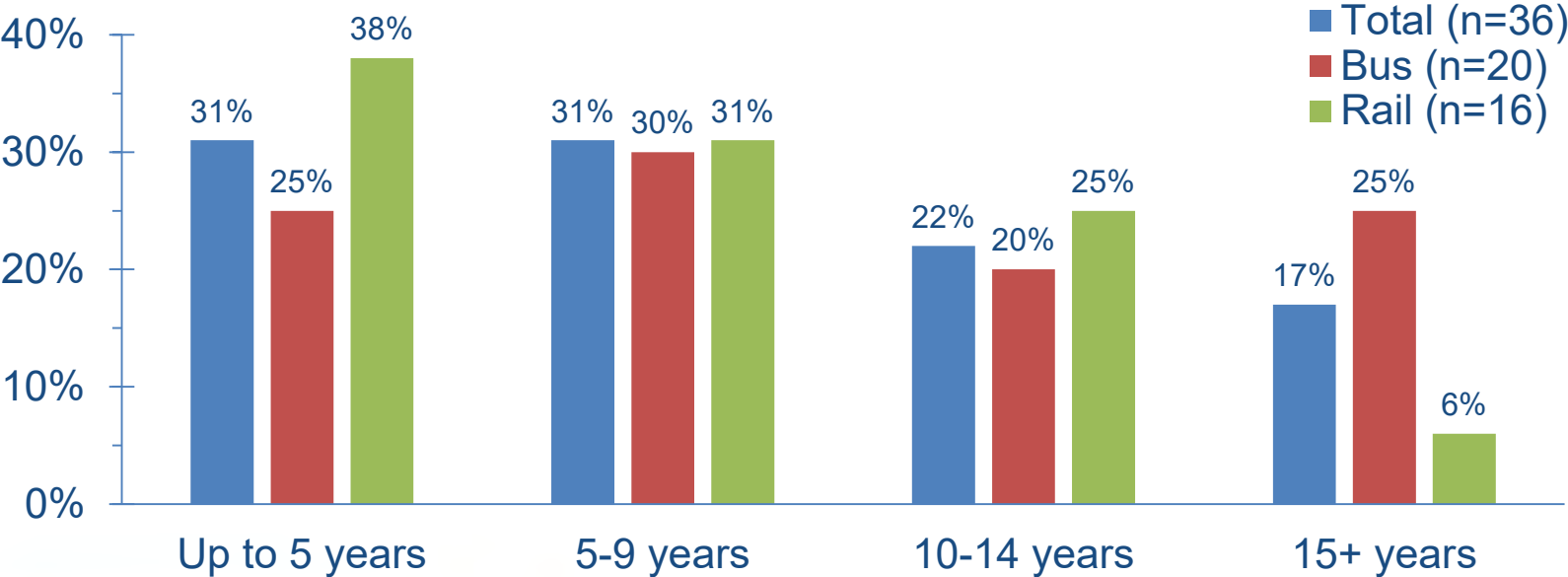
# TriMet LEP Research

## Bus and Field Operations Intercept Survey Results 2018-2019

Research and Administration Subcommittee

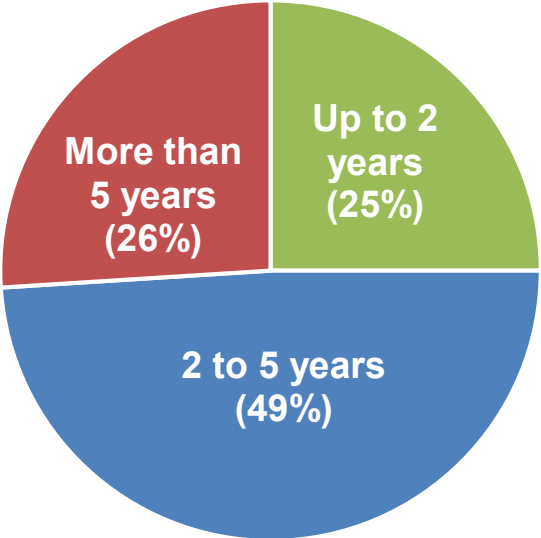
# Respondent Profiles - 2018 Road and Rail Supervisors

## Time with TriMet

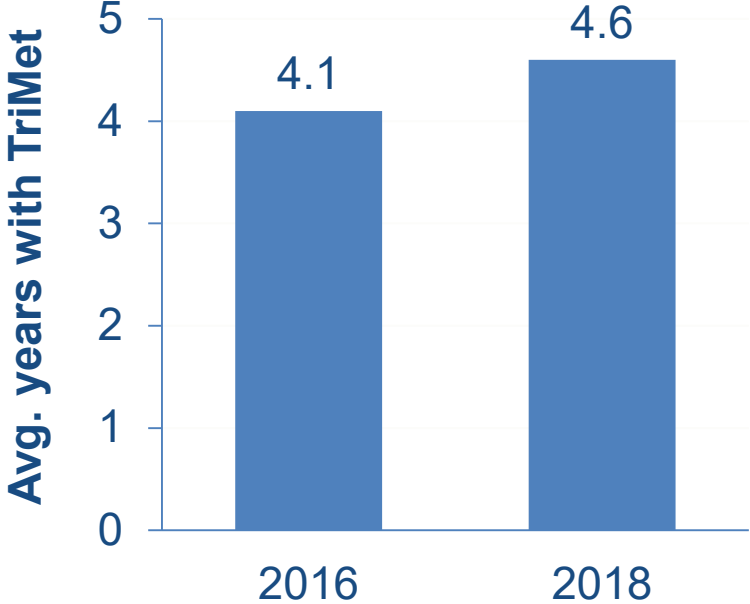




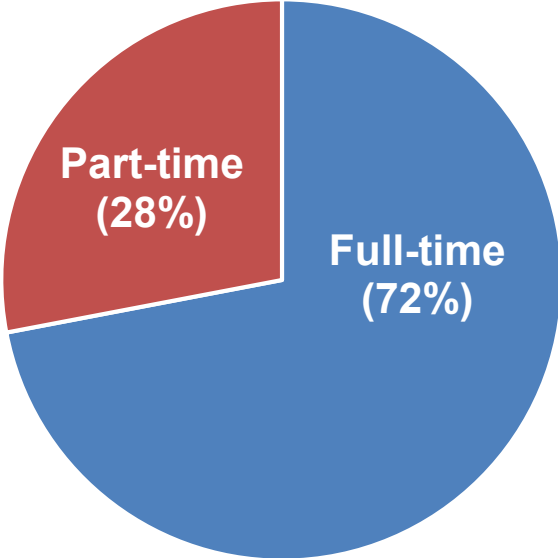
# Respondent Profiles – Bus Operators



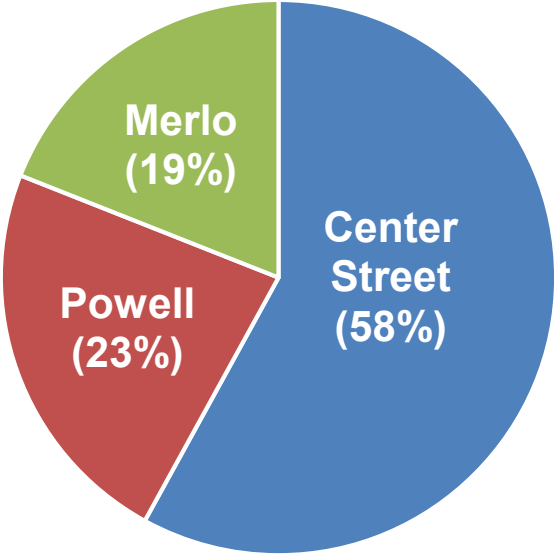
Time with TriMet (2018 survey)



# Respondent Profiles - 2018 Bus Operators (n=225)

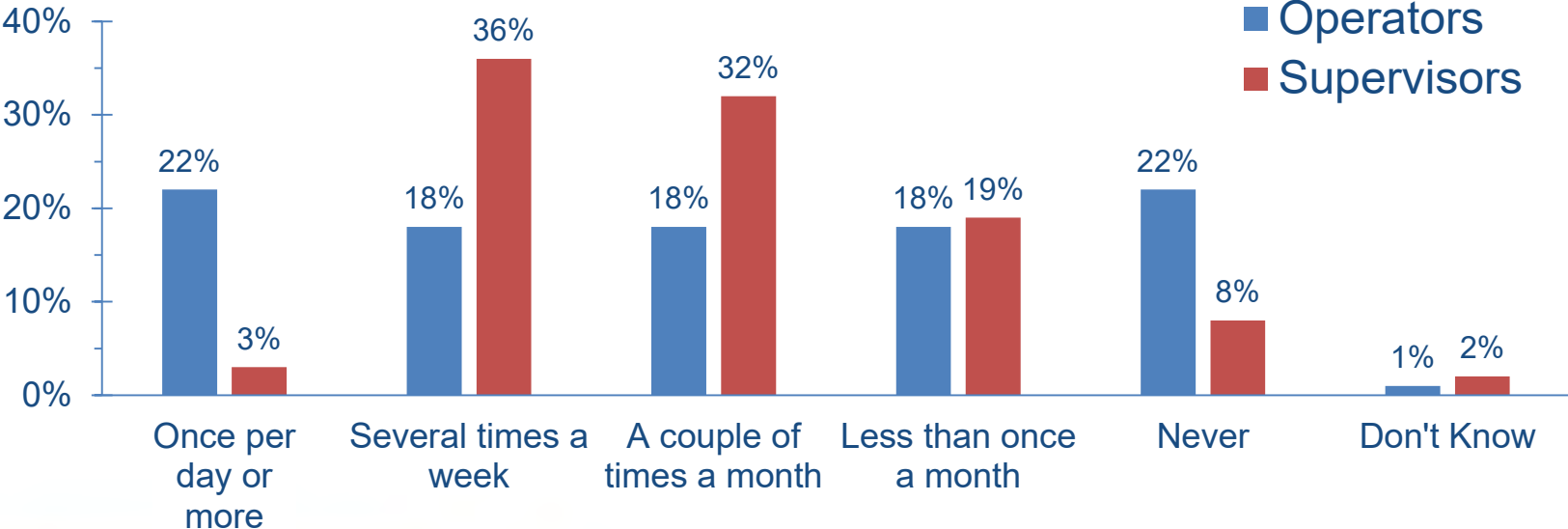


**Schedules**



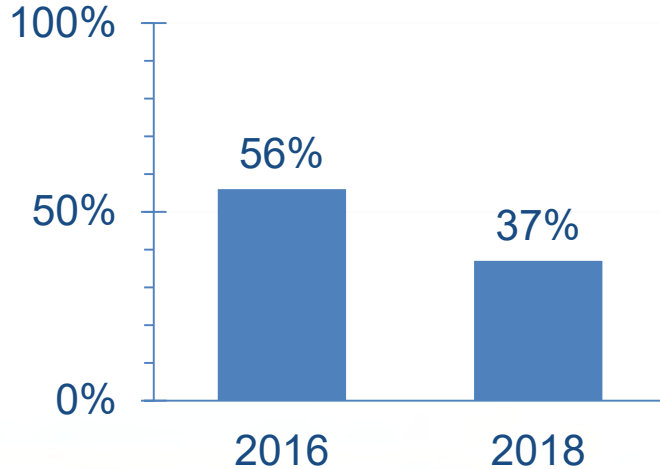
**Home Garage**

# 2018 average results: How often do LEP passengers ask you for information?

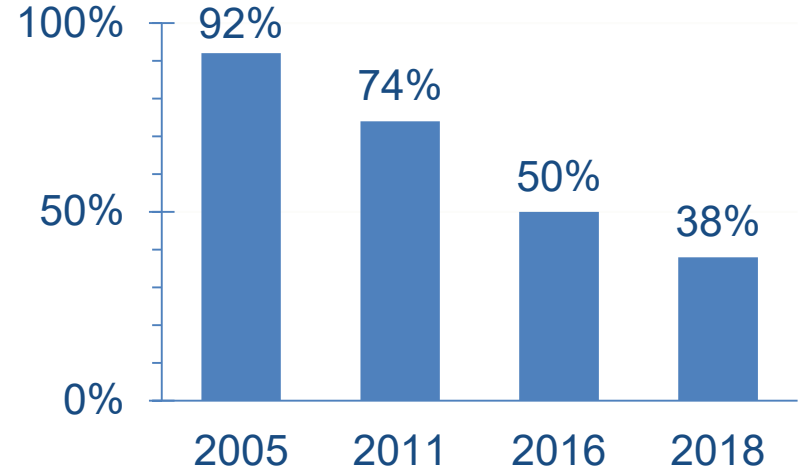


# Key Findings - Operators

**Felt equipped to communicate with LEP Passengers**

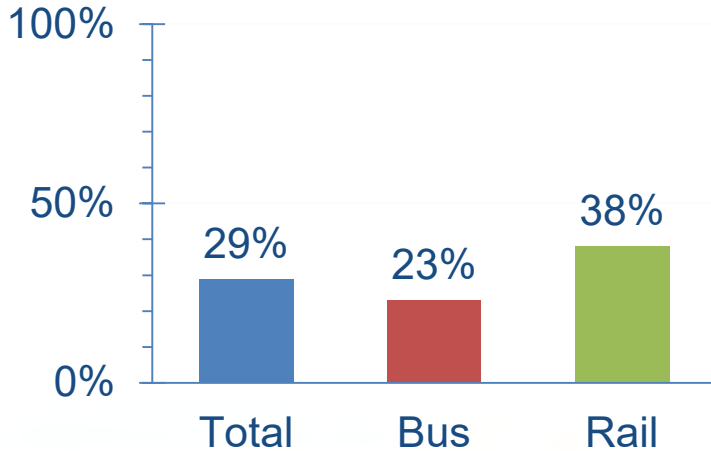


**Aware of TriMet's materials, services and tools for communicating with LEP persons**

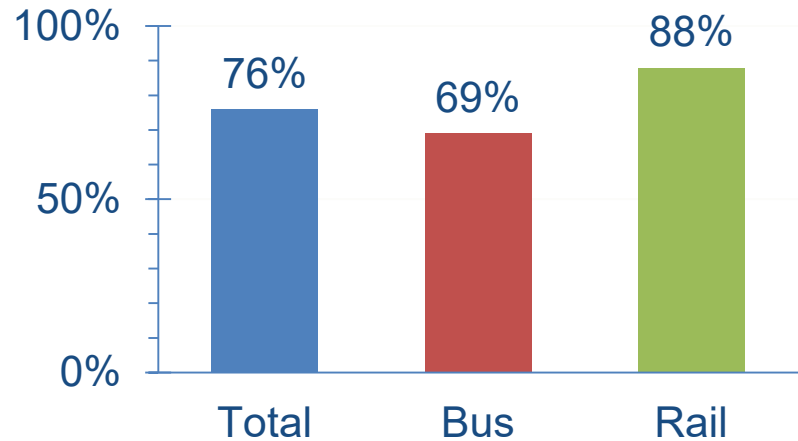


# Key Findings – Supervisors (2018)

Felt equipped to communicate with LEP Passengers

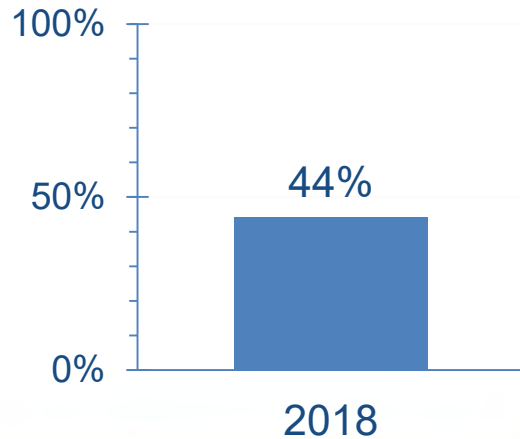


Aware of TriMet's materials, services and tools for communicating with LEP persons

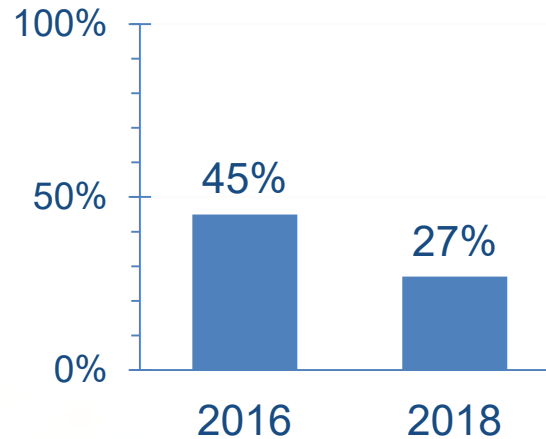


# Key Findings – Operators

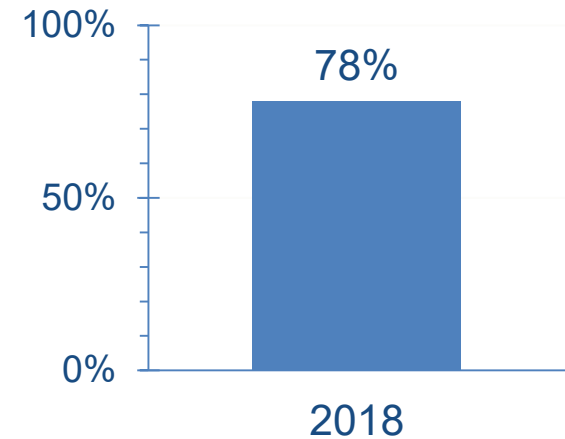
Find it difficult to communicate with LEP passengers



Had received training on how to communicate with LEP passengers

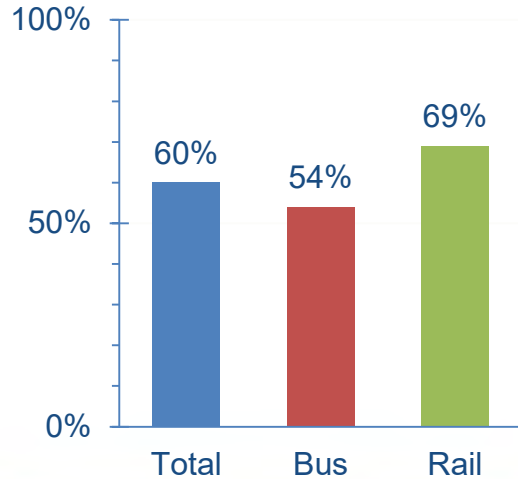


Would like to receive training on communicating with LEP passengers

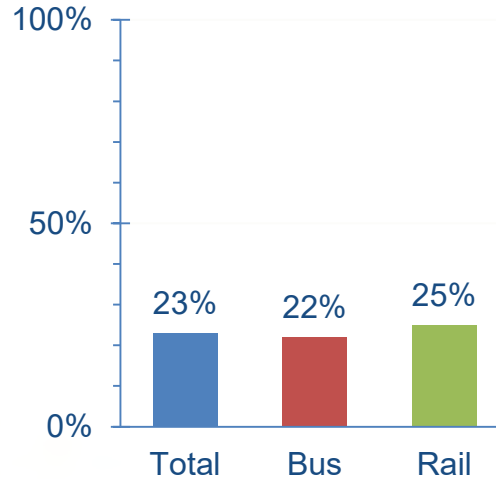


# Key Findings – Supervisors (2018)

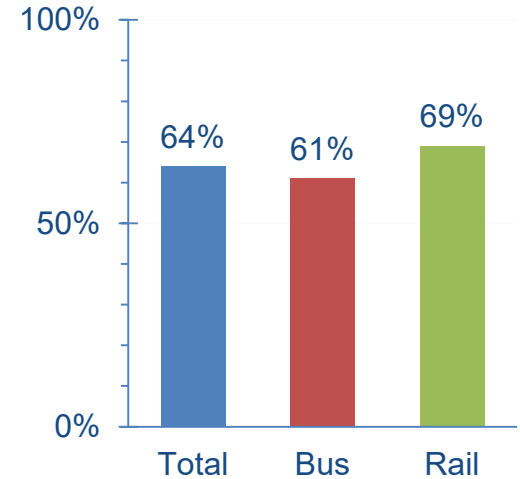
Find it difficult to communicate with LEP passengers



Had received training on how to communicate with LEP passengers



Would like to receive training on communicating with LEP passengers



## Appendix D: Bus Operator Survey Instrument



**TriMet  
Operator Intercept Survey – LEP  
July 2018**

Hello, I am conducting a short survey about your experiences with passengers who speak limited English. We are asking these questions to inform our Title VI reporting. Can I ask you a few questions?

Yes → Thank you. Your answers are confidential and will only be used when combined with the answers of others.

No → Thank, terminate and tally: \_\_\_\_\_

No → Thank, took survey before

Incomplete → End survey

First I'm going to ask you about the last three routes you have driven in the last year. If you've driven less than three routes, tell me only about the route or routes you have driven. If you drive extra-board, tell me about the routes you have driven most frequently.

**1a. What route are you currently driving? (drop down list of bus routes)**

**1b. On that route, about how often do you have passengers who speak limited or no English who asked you for information? Would you say....**

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

**1c. Did you drive another route in the last year?**

1. Yes (continue)
2. No (skip to Q4)

**2a. What is that route? (drop down list of bus routes)**

**2b. On that route, about how often did you have passengers who speak limited or no English who asked you for information?**

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

**2c. Did you drive another route in the last year?**

1. Yes (continue)
2. No (skip to Q4)

**3a. What is that route? (drop down list of bus routes)**

**3b. On that route, about how often did you have passengers who speak limited or no English who asked you for information?**

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

**4. What types of questions do you get asked the most from limited-English-speaking passengers? (Do not read list, check all that apply)**

1. Fares
2. How to get to their destination/building
3. Which bus to take/which bus stop
4. Other (specify) \_\_\_\_\_
5. Don't get asked

**5. Are you aware of any materials, services, or tools that TriMet uses to communicate with limited-English-speaking passengers?**

1. Yes (continue to Q6a)
2. No (skip to Q6b)
3. Don't know (skip to Q6b)

**6a. What are those materials, services or tools? (Do not read list, check all that apply) - Unaided**

1. How to Ride brochure
2. Hop multilingual brochure
3. Language interpretation at 238-RIDE
4. Website
5. Bus/MAX announcements in Spanish
6. Channel cards in Spanish (overhead signs onboard bus/MAX)
7. Other (specify) \_\_\_\_\_

**6b. Are you aware of... (Read list for those not mentioned) - Aided**

1. How to Ride brochure
2. Hop multilingual brochure
3. Language interpretation at 238-RIDE
4. Website
5. Bus/MAX announcements in Spanish
6. Channel cards in Spanish (overhead signs onboard bus/MAX)

**7. In general, how difficult or easy is it for you to communicate with limited English speaking passengers? Would you say:**

1. Very difficult
2. Somewhat difficult
3. Somewhat easy
4. Very easy
5. I don't communicate (don't read)

**8a. Do you feel equipped to communicate with passengers who speak limited or no English?**

1. Yes (continue to Q8b)
2. Depends (continue to Q8b)
3. No
4. Don't know

**8b. In what language or languages do you feel equipped to communicate with passengers who speak limited or no English and how? \_\_\_\_\_**

**9. Is there something TriMet can do to help you communicate with limited-English-speaking passengers?**

1. Yes (continue)
2. No (skip to Q11a)
3. Don't know (skip to Q11a)

**10a. What can TriMet do to better prepare you to assist passengers who speak limited or no English? \_\_\_\_\_**

**10b. Do you have any suggestions on how TriMet can better assist passengers who speak limited or no English?**

1. Yes (specify)

2. No (skip to Q11a)
3. Don't know (skip to Q11a)

**11a. Have you had any training on how to communicate with limited-English-speaking passengers?**

1. Yes (continue to Q11b)
2. No (continue to Q11c)
3. Don't know (continue to Q11c)

**11b. What was the training and who delivered the training or course?**

**11c. Would you like to receive training?**

1. Yes
2. No
3. Don't know

**12. When you need to communicate with limited English speaking passengers, how do you it?**

**(Do not read list; check all that apply)**

1. Alert them to their stop
2. Use diagrams or maps
3. Point to fare signage
4. How to Ride brochure
5. Ask other passengers for help
6. Farebox Spanish
7. I don't communicate (explain: \_\_\_\_\_)
8. Other (specify: \_\_)

**13. There is a Federal Transit Administration guideline that states transit agencies shall work to improve access to services for persons with limited English proficiency. Before today, were you aware of that?**

1. Yes
2. No
3. Don't know

Now I'd like to ask a few questions about you. No identifying information will be asked such as your name or badge number.

**14. How many other languages do you speak besides English? (Enter a number; if the number is 0, then questions 15a and 15b will be skipped; otherwise questions 15a and 15b will be repeated based on the number of other languages spoken)**

**15a. What is that language? (Do not read list, select one)**

1. Spanish
2. Russian
3. Vietnamese
4. Chinese
5. Korean
6. Romanian
7. Japanese
8. Tagalog
9. Mon-Khmer/Cambodian
10. Somali
11. Arabic
12. Ukrainian
13. Persian
14. Other (specify): \_\_\_\_\_

*(If speak more than one language, ask for both...)*

**15b. About how often do you use (restore from Q15a) in your job at TriMet?**

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

**16. How long have you been driving for TriMet? (drop down list of years – up to 40)**

**17. Do you drive full-time or part-time?**

1. Full-time
2. Part-time

**18. Do you currently drive extra-board?**

1. No
2. Yes

**19. What garage do you currently drive from?**

1. Center
2. Merlo
3. Powell

Those are all the questions I have. Thank you for taking part in this survey.

Space for comments (*if needed*) \_\_\_\_\_

-----

Tablet records: Surveyor tablet #, time of day, day of week

## Appendix E: Road and Rail Supervisor Survey Instrument



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

Introduction

As part of TriMet's effort to evaluate access to transit for all members of the community, the Limited English Proficiency (LEP) workgroup would like to conduct intercept surveys with Road and Rail Supervisors, on a volunteer basis, in the next few weeks. Since Road/Rail Supervisors may come in contact with LEP passengers, this research is designed to find:

- How Road and Rail Supervisors communicate with LEP passengers
- Solicit your ideas for better ways to communicate with LEP passengers

All the responses you give are completely confidential. This survey doesn't track who you are or your email address.

Please respond by November 27.

\* 1. First, are you a bus or rail supervisor?

Bus

Rail



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

Everyone ---- these questions are combined bus/rail to simplify.

**In the next pages you will be asked about up to three districts where you have worked in the last year.**

\* 2. What is the main district you currently work in?

\* 3. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

Second district

\* 4. Did you work in another district in the last year?

Yes

No





Road and Rail Supervisors  
Limited English Proficient Passenger Survey

Second district

\* 5. What is the next district where you worked the most often in the last year?

\* 6. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

Third district

\* 7. Did you work in another district in the last year?

Yes

No



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

Third district

\* 8. What is the next district where you worked the most often in the last year?

\* 9. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

10. What types of questions do you get asked the most from limited-English-speaking passengers?(Check all that apply.)

- Fares
- How to get to their destination/building
- Which bus to take/which bus stop
- Don't get asked
- Other (please specify)

\* 11. Are you aware of any materials, services, or tools that TriMet uses to communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know

12. If yes, what are those materials, services or tools?



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

13. Below are ways that TriMet communicates with limited-English-speaking passengers. Check all that you are aware of.

- Fares and How to Ride brochure
- TeleLanguage Card
- TriMet Respects Civil Rights brochure
- Hop multilingual brochure
- Language translation at 238-RIDE
- Website

\* 14. In general, how difficult or easy is it for you to communicate with limited English speaking passengers?

- Very difficult
- Somewhat difficult
- Somewhat easy
- Very easy
- I don't communicate

\* 15. Do you personally feel equipped to communicate with passengers who speak limited or no English?

- Yes
- Depends on the language
- No
- Don't know

\* 16. Is there something TriMet can do to help you communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

17. What can TriMet do to better prepare you to assist passengers who speak limited or no English?

\* 18. Do you have any suggestions on how TriMet can better assist passengers who speak limited or no English?

- Yes
- No
- Don't know

19. *If yes*, what suggestions do you have?



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

\* 20. Have you had any training on how to communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know

21. If yes, what was the training and who delivered the training or course?

\* 22. Would you like to receive training?

- Yes
- No
- Don't know

23. When you need to communicate with limited English speaking passengers, how do you it?(Check all that apply.)

- Use diagrams or maps
- Point to fare signage
- How to Ride brochure
- TeleLanguage Card
- Ask other people for help
- I don't communicate
- Other (please specify)



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

About you

Now we'd like to ask a few questions about you. No identifying information will be asked such as your name or badge number.

24. How many other languages do you speak besides English?

25. If you speak another language, what language (s)? (Check all that apply.)

- |   |  |                                    |
|---|--|------------------------------------|
| <input type="checkbox"/> Spanish                | <input type="checkbox"/> Romanian            | <input type="checkbox"/> Arabic    |
| <input type="checkbox"/> Russian                | <input type="checkbox"/> Japanese            | <input type="checkbox"/> Ukrainian |
| <input type="checkbox"/> Vietnamese             | <input type="checkbox"/> Tagalog             | <input type="checkbox"/> Persian   |
| <input type="checkbox"/> Chinese                | <input type="checkbox"/> Mon-Khmer/Cambodian |                                    |
| <input type="checkbox"/> Korean                 | <input type="checkbox"/> Somali              |                                    |
| <input type="checkbox"/> Other (please specify) |  |                                    |

26. If you speak another language, about how often do you use that language in your job at TriMet?  
Answer for the other language that you speak most often in the job.

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



27. How long have you been a supervisor for TriMet?

- Up to 5 years
- 5 - 9 years
- 10 - 14 years
- 15 years or more

28. Do you currently work an auxillary shift?

- Yes
- No

29. Do you currently, or have you ever, worked a code enforcement shift?

- Yes
- No



Road and Rail Supervisors  
Limited English Proficient Passenger Survey

Thank you!

**Those are all the questions. Thank you for taking this survey.**

30. Comments?

**Subrecipient's Title VI Compliance Template**

**Covering Activities in TriMet's FY2020 (July 1, 2019 - June 30, 2020)**

**Subrecipient(s):**

Updated by:	
Date updated:	

Intergovernmental Agreement Background:

**FY2020**

*The following general requirements are applicable to public transportation provider that operates demand response service, must submit to TriMet:*

Component	Criteria pursuant to FTA Circular 4702.1B (eff. 10/01/12)	Applicable - Yes / No	Due Date	Date of submission	Notes/Comments
Title VI Assurances	Chapter III - Section 2	No	N/A	N/A	
Title VI Program - which includes:	Chapter III				
Public Notice	Chapter III - Sections 4(a)(1)	Yes	August 15th every year		
	Chapter III - Sections 5				
	Appendix B				
Complaint Procedures	Chapter III - Sections 4(a)(2)	Yes	August 15th every year		
	Chapter III - Sections 6				
	Appendix C				
Complaint Form	Chapter III - Sections 4(a)(2)	Yes	August 15th every year		
	Chapter III - Sections 6				
	Appendix D				
List of Transit Related Title VI Complaints, Investigations, and Lawsuits	Chapter III - Sections 4(a)(3)	Yes	August 15th every year		
	Chapter III - Sections 7				
	Appendix E				

Public Participation Plan	Chapter III - Sections 4(a)(4)	Yes	August 15th every year		
	Chapter III - Sections 8				
Language Assistance Plan	Chapter III - Sections 4(a)(5)	Yes	August 15th every year		
	Chapter III - Sections 9				
Minority Representation Table	Chapter III - Sections 4(a)(6)	Yes	August 15th every year		
	Chapter III - Sections 10				
	Appendix F				
Providing Assistance and Monitoring of Subrecipient Compliance	Chapter III - Sections 4(a)(7)	No	August 15th every year		
	Chapter III - Sections 11 & 12				
	Appendix L				
Facility Location Equity Analysis	Chapter III - Sections 4(a)(8)	No	August 15th every year		
	Chapter III - Sections 13				

<i>The following additional requirements (along with general requirements) are applicable to any fixed route transportation provider:</i>					
Component	Criteria pursuant to FTA Circular 4702.1B (eff. 10/01/12)	Applicable - Yes / No	Due Date	Any changes or date of new submission?	Notes/Comments
System-wide Service Standards which includes:	Chapter IV				
Vehicle load for each mode	Chapter IV - Section 4(a)(1) Appendix G-1	Yes	April 30th every 3rd year	August 15th every year	

Vehicle headway for each mode	Chapter IV - Section 4(a)(2) Appendix G-2	Yes	April 30th every 3rd year	August 15th every year	
On time performance for each mode	Chapter IV - Section 4(a)(3) Appendix G-3	Yes	April 30th every 3rd year	August 15th every year	
Service availability for each mode	Chapter IV - Section 4(a)(4) Appendix G-3	Yes	April 30th every 3rd year	August 15th every year	
<b>System-wide Service Policies which includes:</b>	Chapter IV				
Transit Amenities for each mode	Chapter IV - Section 4(b)(1) Appendix H	Yes	April 30th every 3rd year	August 15th every year	
Vehicle Assignment for each mode	Chapter IV - Section 4(b)(2) Appendix H	Yes	April 30th every 3rd year	August 15th every year	

*The following additional requirements (along with general and additional requirements noted above) are applicable to providers of transit service that operate 50 or more fixed route vehicles in peak services and are located in Urbanized Area (UZA) of 200,000 or more people must also submit to TriMet:*

Component	Criteria pursuant to FTA Circular 4702.1B (eff. 10/01/12)	Applicable - Yes / No	Due Date	Any changes or date of new submission?	Notes/Comments
<b>Collect &amp; Report Data which includes:</b>	Chapter IV				
Demographic and service profile maps and charts	Chapter IV - Section 5(a) Appendix I	No	August 15th every year	N/A	
Demographic ridership and travel patterns, collected by surveys	Chapter IV - Section 5(b)	No	August 15th every year	N/A	
Monitor transit service	Chapter IV - Section 6 Appendix J	No	August 15th every year	N/A	
Evaluate service & fare equity changes	Chapter IV - Section 7 Appendix K	No	August 15th every year	N/A	



**Title VI Service Equity Analysis: FY2021 Annual Service Plan**  
**Department of Transit Equity, Inclusion, and Community Affairs**

**October 7, 2020**

## Executive Summary

TriMet is proposing to implement several service improvements in summer 2020, fall 2020 and spring 2021. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an Equity Analysis any time Major Service Changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The service proposal includes Major Service Changes to five bus lines. Thus, an analysis is required prior to the TriMet Board of Directors taking action.

### Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as well as the way in which TriMet conducts Equity Analyses. Major Service Changes are analyzed for both potential adverse effects and distribution of benefits. This is done at both the individual line-level and system-level, and the analysis seeks to identify any potential disparities based on race/ethnicity or income.

### Major Service Changes

The proposed changes to five existing lines meet TriMet's established thresholds for Major Service Changes:

- Line "N" – Baseline (New)
- Line 16 – Front Ave/St Helens Rd
- Line 47 – Main/Evergreen
- Line 87 – Airport Way/181st
- Line 155 – Sunnyside

### Findings

1. **No system level disparate impact or disproportionate burden** for the 5 major service increases.
2. The vast majority of improvements are on lines with **average-or-above minority populations** in their service areas. As a result, a greater share of the region's minority populations stand to **benefit** as compared to higher income populations.
3. A majority of improvements are on lines with **average-or-above low-income populations** in their service areas. As a result, a greater share of the region's low-income populations stand to **benefit** as compared to higher income populations.
4. **Disproportionate and adverse effects** from the one major service reduction (Line 47). The minority and low-income populations in this service area are above the disparate impact and disproportionate burden thresholds. Potential impacts will be mitigated by the new bus line resuming service to the removed portion with a comparable level of service. Results from an on-board survey indicate there were no significant differences found when looking at the new route transfer question by race and income.

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**Attachment A:** Analysis of impact on access to employment, education, health care, food, and parks/public recreation for minority and low-income populations



## I. Background

Building upon several years of ongoing service improvements, TriMet's Annual Service Plan for FY2021<sup>1</sup> proposes Major Service Changes to five bus lines. Other changes will involve changes to improve reliability, travel time, and improvements to on-time performance for lines. Though these changes will represent improvements for riders on those lines, they are not large enough changes to be reviewed as Major Service Changes. The Major Service Changes presented here represent the large majority of TriMet's proposed changes for FY21. The TriMet Board's approval of a ten-year payroll and self-employment tax rate increase in 2015 makes the changes possible.

TriMet has engaged the community for the past few years to develop a shared vision for future transit service that will guide how the additional revenue is invested. Each year, TriMet staff will use information developed from the shared vision planning efforts and outreach, updated analyses and measures, and additional outreach to prioritize incremental service improvements for that year. The efforts will focus on five factors defined by the TriMet Board: *demand, productivity, connections, equity, and growth*. Each year's plan will also consider safety, budget availability, and availability of staff and equipment to provide for expanded service.

This report documents the equity analysis conducted for these changes.

## II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration ("FTA") financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

*"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."*

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B ("Circular"). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations as well as minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

TriMet's Title VI Program<sup>2</sup> outlines the agency's policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as set forth below.

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<sup>1</sup> Fiscal year 2021 runs from July 1, 2020 to June 30, 2021.

<sup>2</sup> TriMet's Title VI Program was updated and submitted to FTA in fall 2019

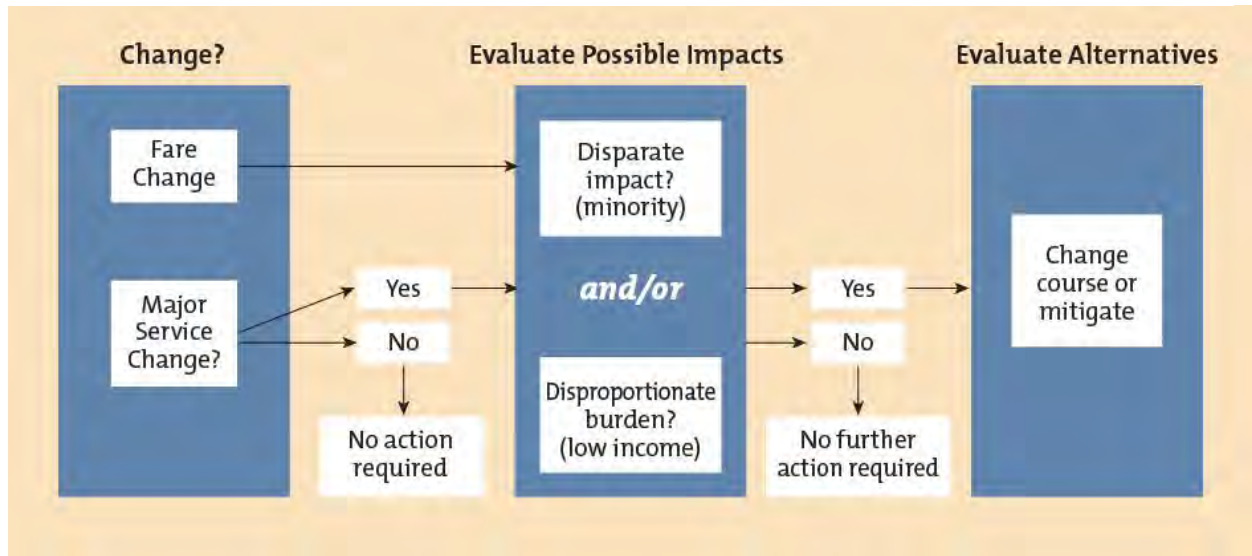
## A. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the Board for its consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is defined as:

1. A change to **15% or more of a line's route miles**. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of **15% or more to a line's span** (hours) of service on a daily basis for the day of the week for which a change is made, or;

**Figure 1: Overview of TriMet's Title VI Equity Analysis process**



3. A change of **15% or more to a line's frequency** of service on a daily basis for the day of the week for which a change is made, or;
4. A single transit line is **split** into two or more transit lines, or;
5. A **new transit line** is established.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis

## B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the benchmarks established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (span in days and/or hours, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disparate impact associated with service changes is defined separately for impacts of changes on an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
  - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 32 percent compared to 29 percent).
  - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district’s minority population that is impacted is compared to the percentage of the TriMet district’s non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.

2. In the event of service improvements:

- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
    - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
    - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 26 percent compared to 29 percent).
  - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

### C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

## III. Proposed Service Changes

### A. Description of Changes

Table 1 lists the proposed service changes by the quarter in which they would take effect. All changes proposed for the next year are service increases.

**Table 1: Proposed Service Changes in FY21 Annual Service Plan**

Quarter	Line	Service Change Description
June 2020	16 - Front Ave/St Helens Rd	➤ Add Sunday Service
Fall 2020	"N" – Baseline	➤ New Transit Line
	47 – Main/Evergreen	➤ Re-route ➤ Increase weekday frequency
		➤
Spring 2021	87 – Airport Way/181 <sup>st</sup>	➤ Add later trips during the weekday
	155 - Sunnyside	➤ Increase weekday peak frequency
		➤

*Note: The FY21 Annual Service Plan also includes minor changes; however, These changes are not included in this analysis because they are too small to reach the Major Service Change threshold.*

## B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed service are compared in terms of route length, frequency, and span (hours) of service. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over the course of three years.

Results of the comparison are shown in Table 2. To summarize, these changes meet TriMet’s adopted Title VI Major Service Change definition:

**Line “N” – Baseline:** New Transit Line

**Line 16 – Front Ave/St Helens Rd:** Add Sunday Service

**Line 47 – Main/Evergreen:** Re-route and Frequency increase of over 15% on weekdays

**Line 87 – Airport Way/181<sup>st</sup>:** Span increase of over 15% on weekdays

**Line 155 – Sunnyside:** Frequency increase of over 15% on weekdays

**Table 2: Results of Major Service Change Test By Line**

Line	Change in Route Length	Change in Span	Change in Frequency	Line Split	New Line or New Service
<b>New Line - Baseline</b>					✓
<b>Line 16 - Front Ave/St Helens Rd (Sunday)</b>					✓
<b>Line 47 - Main/Evergreen</b>	✓				
<b>Line 87- Airport Way/181st</b>		+17%			
<b>Line 155 - Sunnyside (Weekday)</b>			+47%		

### C. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and service increases are analyzed. For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations. The line-level analysis compares minority and low-income populations for the service area of each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. Major Service Reduction
2. Major Service Increases
3. Other Major Service Changes

#### 1. Major Service Reduction

For service reductions, the analysis examines whether *adverse effects* (defined on pg. 3) are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line's minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

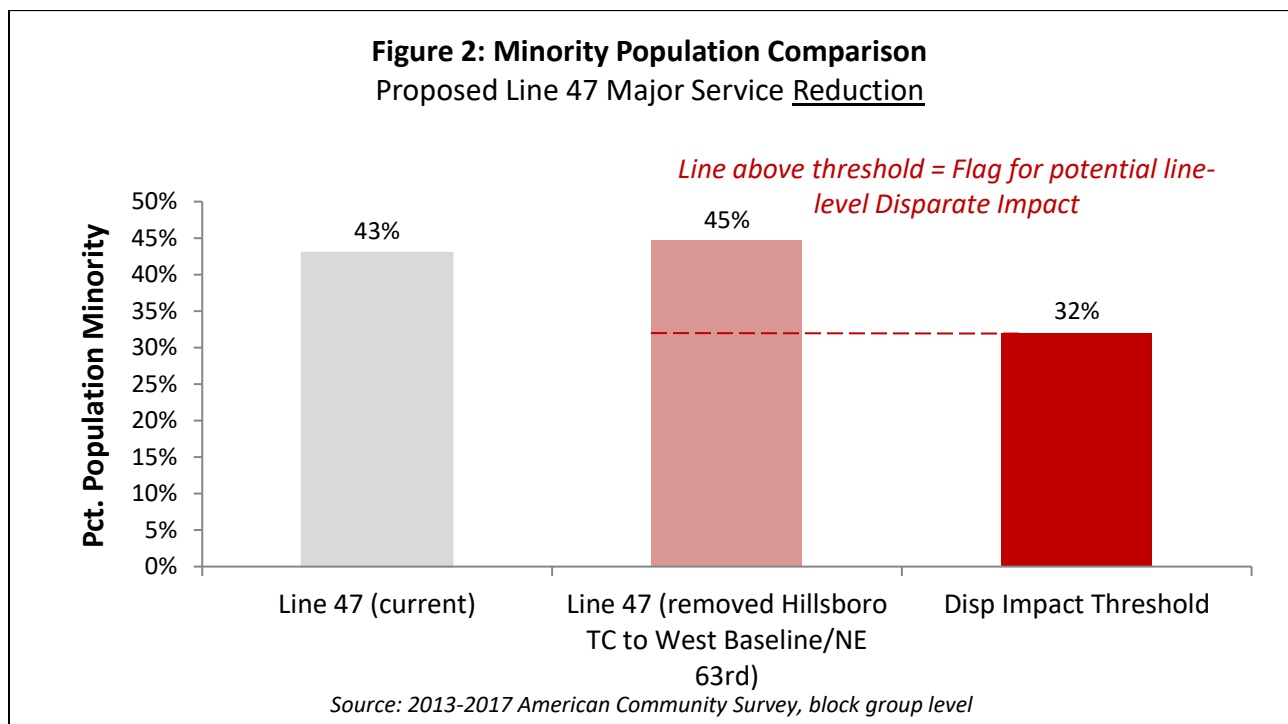
The proposal for the Line 47 includes the only Major Service Reduction in this service plan.

➤ **Line 47 (Route realignment)**<sup>3</sup>

The Line 47 route change would add service between South Hillsboro and Portland Community College-Rock Creek. Doing so would remove Line 47 service from a total of 28 stops, including both directions of service. As shown in Figures 2 and 3, the population in the surrounding area is 45% minority and 30% low-income, which are above the Disparate Impact threshold (32%) and Disproportionate Burden threshold (24%) for Major Service Reductions. Thus, this change is flagged for potential line-level Disparate Impact and no Disproportionate Burden. All stops will have comparable service within ¼ mile due to the new bus line continuing to serve those stops that are currently served by the Line 47. Therefore, adverse effect does not apply and the new bus line will serve as the mitigation for this route change.

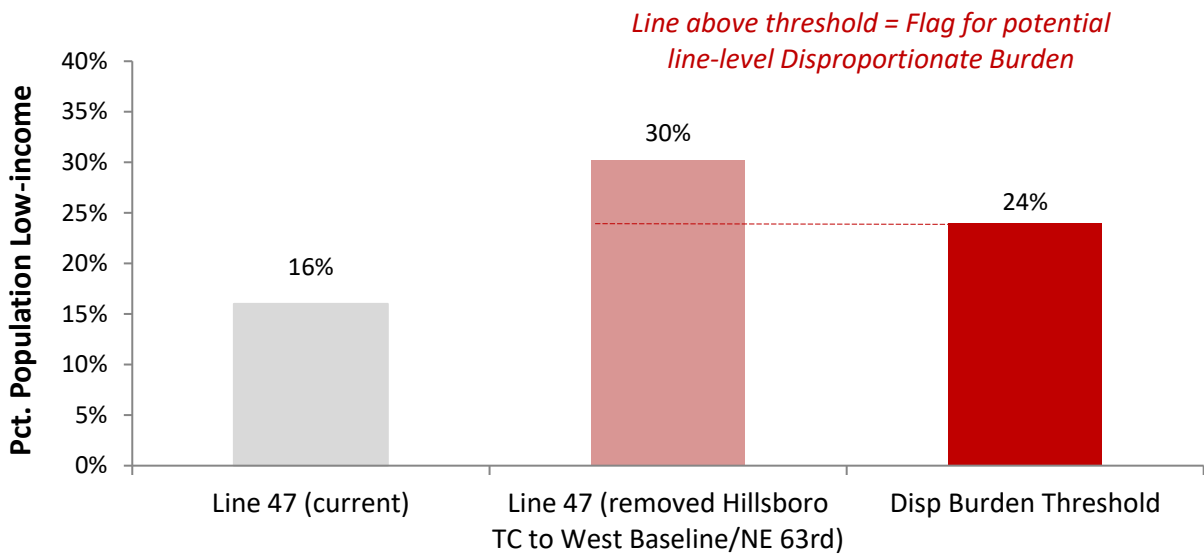
	No. of Stops	Total daily ons/off (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	28	538	45%	30%
<b>Nearest comparable service</b>				
Less than ¼ mile	28	538	45%	30%
Over ¼ mile*	0	0	0%	0%

\*Adverse effect applies



<sup>3</sup> This section only analyzes the service reduction component of the Line 47 service change proposal. The analysis of the service increase component is provided in the next section.

**Figure 3: Low-income Population Comparison**  
Proposed Line 47 Major Service Reduction



Source: 2013-2017 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

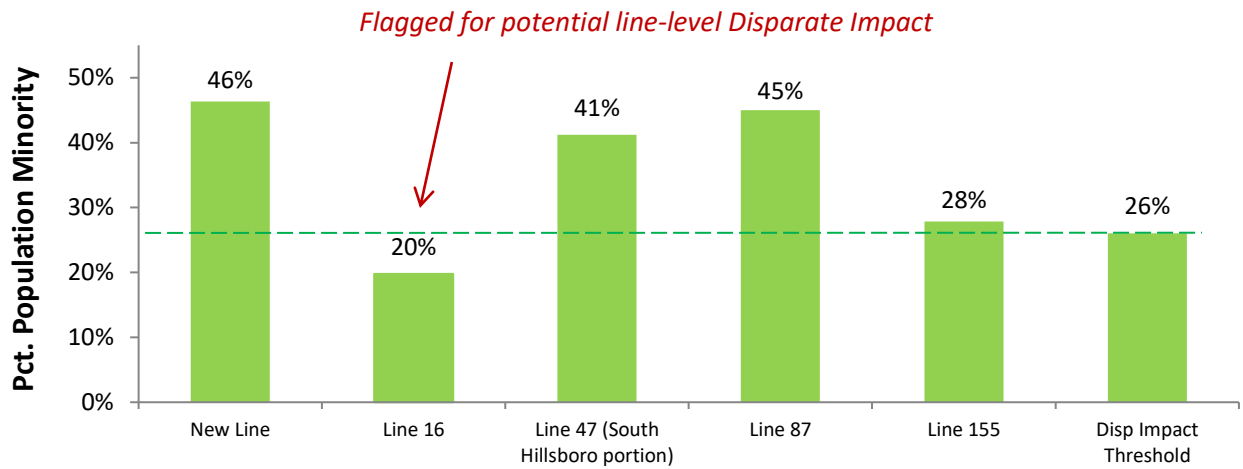
## 2. Major Service Increases

For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

Figure 4 displays the minority population along each line proposed for a major increase as compared to the 26% Disparate Impact threshold. Figure 5 displays the low-income population along each line as compared to the 19% Disproportionate Burden threshold. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, food and parks/public recreation for minority and low-income populations.

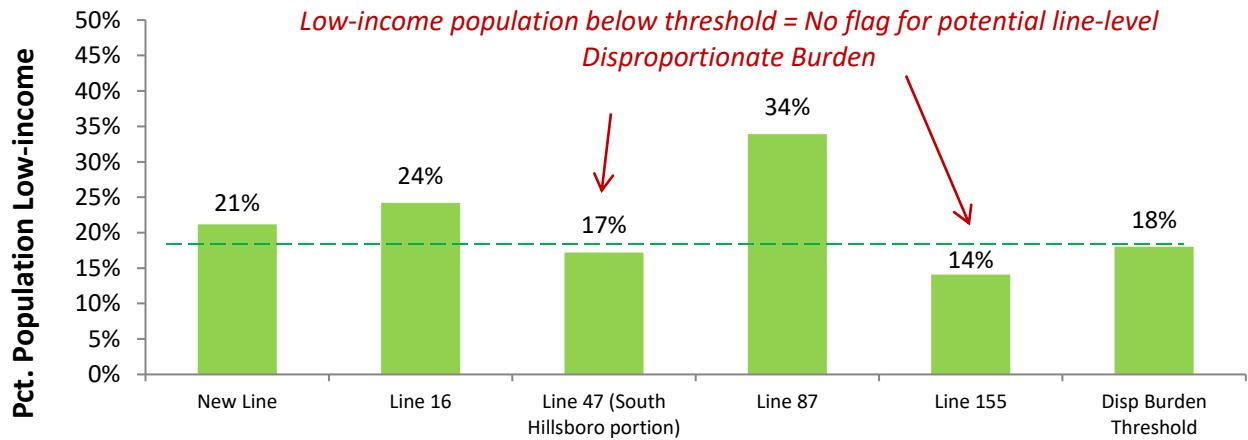


**Figure 4: Minority Population Comparison**  
 Lines with proposed Major Service Increases & Disparate Impact Threshold



Source: 2013-2017 American Community Survey, block group level

**Figure 5: Low-income Population Comparison**  
 Lines with proposed Major Service Increases & Disproportionate Burden Threshold



Source: 2013-2017 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

➤ **Line “N” – Baseline (New bus line)**

The proposed routing for this line would potentially benefit a service area population that is **46% minority** and **21% low-income**, which are at or above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Additionally, the new bus line will take over service from Line 47 between Hillsboro Transit Center and Downtown Hillsboro. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

In terms of access<sup>4</sup>, this line would maintain<sup>5</sup> service from the Line 47 to:

- About 10,761 jobs
  - 80% are low-to-medium wage jobs, which is above the TriMet district average
  - 9% are jobs held by minorities, which is below the TriMet district average
  - 14% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 community college and 2 educational centers
- 6 grocery stores/supermarkets, including 2 Hispanic grocer
- 3 employment resource centers
- 6 human and social services centers
- 1 parks/public recreation

In terms of access, this line would provide new service to:

- About 6,668 jobs
  - 90% are low-to-medium wage jobs, which is above the TriMet district average
  - 16% are jobs held by minorities, which is above the TriMet district average
  - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 middle school
- 1 grocery store/supermarket
- 1 human and social services centers

➤ **Line 16 – Front Ave/St. Helens Rd (Add Sunday Service)**

This service increase would potentially benefit a service area population that is **20% minority**, which is below the Disparate Impact threshold (26%) for Major Service Increases. This indicates a **potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section. The service area population is **24% low-income**, which is above the Disproportionate Burden threshold (18%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level.

In terms of access, this added service would improve service to:

- About 112,233 jobs
  - 85% are low-to-medium wage jobs, which is above the TriMet district average
  - 12% are jobs held by minorities, which is below the TriMet district average
  - 6% are jobs held by Hisp./Latino workers, which is below the TriMet district average
- 1 community college, 1 high school, and 3 educational centers

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<sup>4</sup> Access defined as within ¼ mile of a stop on the line. For full details of access to services by line, see Attachment A.

<sup>5</sup> Service removed from Line 47 will be maintained by the New “N” Line

- 6 grocery stores/supermarkets, including 1 international grocer
- 2 human and social services centers
- 6 employment resource centers

➤ **Line 47 – Main/Evergreen** (Re-route and weekday frequency increase)

The proposed route change would extend service and increase frequency for Line 47 riders. This service increase to the South Hillsboro portion would potentially benefit a service area population that is **41% minority**, which is above the Disparate Impact threshold (26%) for Major Service Increases. Thus, there is **no Disparate Impact** at the line level. The service area population is **17% low-income**, which is below the Disproportionate Burden threshold (18%) for Major Service Increases. This indicates a **potential Disproportionate Burden**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.

In terms of access, the route change would provide new service to:

- About 4,687 jobs
  - 75% are low-to-medium wage jobs, which is much greater than the TriMet district average
  - 18% are jobs held by minorities, which is much greater than the TriMet district average
  - 9% are jobs held by Hisp/Latino workers, which is slightly above the TriMet district average
- 1 community college and one high school
- 9 grocery stores/supermarkets, including 1 international grocer
- 2 human and social services centers

In terms of access, the frequency increase would improve service to:

- About 35,723 jobs
  - 82% are low-to-medium wage jobs, which is well above the TriMet district average
  - 18% are jobs held by minorities, which is well above the TriMet district average
  - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 high school, 1 middle school, and 2 educational centers
- 9 grocery stores/supermarkets, including 1 Hispanic grocer
- 2 human and social services centers

➤ **Line 87 – Airport Way/181st** (Weekday span improvements)

This service increase would potentially benefit a service area population that is **45% minority** and **34% low-income**, which are above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

In terms of access, this added service would improve service to:

- About 64,790 jobs
  - 87% are low-to-medium wage jobs, which is much greater than the TriMet district average
  - 14% are jobs held by people of color, which is above the TriMet district average
  - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 community college, 1 high school, 1 middle school, and 3 educational centers
- 5 community health care service centers
- 12 grocery stores/supermarkets, including 2 international grocer and 1 Hispanic grocer

➤ **Line 155 – Sunnyside** (Weekday frequency increase)

This service increase would potentially benefit a service area population that is **28% minority**, which is above the Disparate Impact threshold (26%) for Major Service Increases. Thus, there is **no Disparate Impact** at the line-level. The service area population is **14% low-income**, which is below the Disproportionate Burden threshold (18%) for Major Service Increases. This indicates a **potential Disproportionate Burden**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.

In terms of access, this added service would improve service to:

- Over 23,390 jobs
  - 77% are low-to-medium wage jobs, which is greater than the TriMet district average
  - 4% are jobs held by minorities, which is well below the TriMet district average
  - 8% are jobs held by Hisp./Latino workers, which is similar to the TriMet district average
- 1 high school and 1 medical school
- 1 employment resource center
- 2 human and social services centers
- 7 grocery stores/supermarkets

### 3. Other Major Service Changes

There are no Other Major Service Changes

## D. System-level Analysis

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

➤ **System-level Disparate Impact Analysis: Major Service Increases**

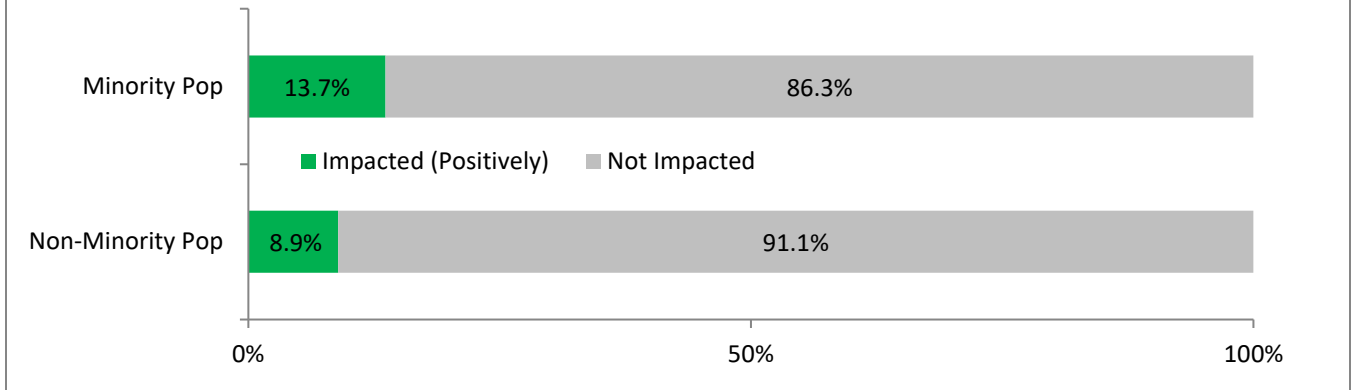
The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District's minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District's non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District's minority than non-minority population stood to benefit from the improvements.

Table 4 and Figure 6 compare the positively impacted minority and non-minority populations. A greater percentage of the District's minority population stands to benefit by the proposed Major Service Increase compared to the non-minority population (13.7% vs. 8.9%, respectively). Therefore, **no System-level Disparate Impact** is found related to the proposed Major Service Increases.

**Table 4: System-level Disparate Impact Analysis of Major Service Increases**

Pct. of TriMet District Non-Minority Pop Positively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Positively Impacted	Potential Disparate Impact?
8.9%	Less than 7%	13.7%	No

**Figure 6: System-level Impacts of Proposed FY21 Major Service Improvements**  
Minority and Non-minority Populations



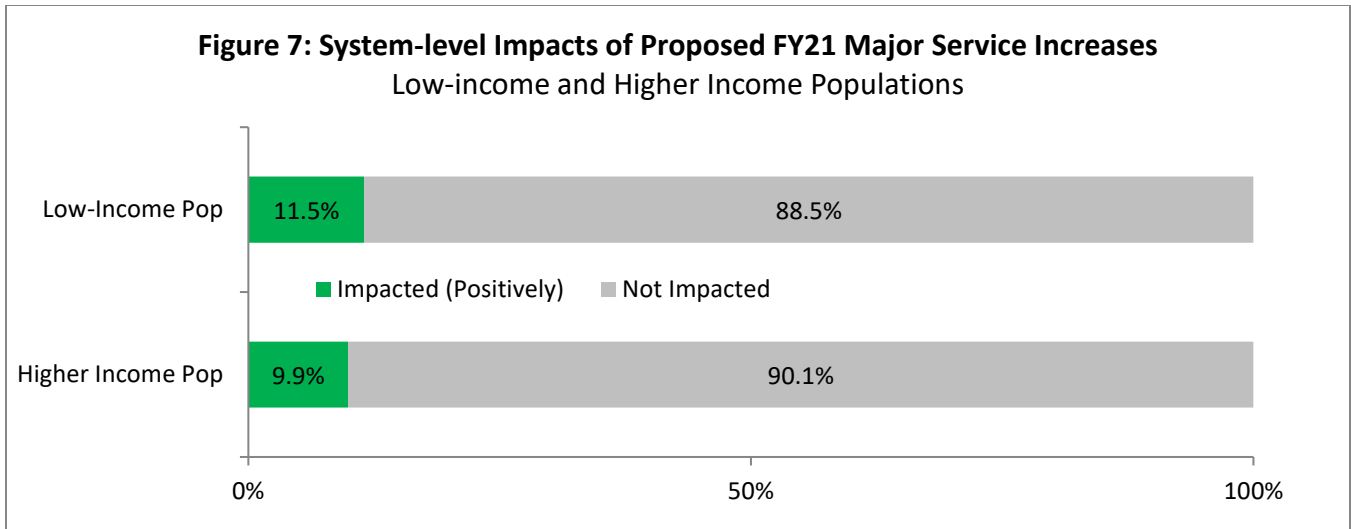
➤ **System-level Disproportionate Burden Analysis: Major Service Increases**

The System-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Increases, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s low-income than higher income population stands to benefit from the improvements.

Table 5 and Figure 7 compare the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Increases as compared to the higher income population (11.5% vs. 9.9%, respectively). Therefore, **no System-level Disproportionate Burden** is found related to the proposed Major Service Increases.

**Table 5: System-level Disproportionate Burden Analysis of Major Service Increases**

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-Income Pop Disparate Impact Threshold	Pct. of TriMet District Low Income Pop Positively Impacted	Potential Disproportionate Burden?
9.9%	Less than 8%	11.5%	No



#### IV. Community Engagement

The service proposals analyzed in this report stem from a multi-year planning and outreach process to develop a vision for future transit service in the Portland metropolitan region. Divided by sub-region of the TriMet service district, these “Service Enhancement Plans” were undertaken to identify and prioritize opportunities to improve bus service as well as pedestrian and bike access to transit, given current and projected population and job growth. These are long-range plans which include dozens of bus service improvements beyond those proposed for implementation over the next year.<sup>6</sup>

An initial FY21 service plan was developed in fall 2019, at which point TriMet posted the proposed changes on [trimet.org](https://trimet.org) to solicit feedback, placed advertisements in newspapers across the service district, conducted on-board outreach and sent postcards to nearby residents of lines with proposed routing changes, presented the proposal to the Transit Equity Advisory Committee, sent emails to riders and other stakeholders, and staff held four TriMet Open Houses. TriMet contracted with the Immigrant & Refugee Community Organization (IRCO) to design, promote, and help run the open house meetings. Open house attendees received HOP cards, while IRCO provided food, interpretation services, and daycare upon request. At this time, there are no modifications requested through the feedback and a majority of the comments were in support of the FY21 service proposal.

For the second phase of outreach, TriMet will hold two open houses in February 2020 to solicit feedback about any updates to the proposal. Many elements of the initial outreach phase will be repeated (postcards, newspaper advertisements, emails). Finally, TriMet will hold a public hearing at its March 25, 2020 board meeting to receive comments on the proposed service changes.

The following is a summary of themes across the feedback received: *[This section will be completed once all public input is reviewed and the TriMet board of directors has been made aware and considered this service proposal and equity analysis.]*

<sup>6</sup> For more information, go to <https://trimet.org/betterbus/serviceimprovements-fy21>

## V. Summary of Findings

Table 6 on the next page summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses. As shown, Title VI concerns are minimal with the proposed FY21 Annual Service Plan. The proposal promises to improve service significantly for minority and low-income populations, with only one improvement (to Line 16) serving areas with relatively low minority populations as compared to the TriMet district. The Lines 47 (South Hillsboro portion) and 155 also serves a relatively low proportion of low-income households as compared to the TriMet district. However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given: a) the results of the system-level analysis; b) that the other 4 lines proposed for improvements did not have any line-level Disparate Impacts; and c) the other 3 lines proposed for improvements did not have any line-level Disproportionate Burdens.

The one proposed service reduction (to the Line 47) does appear to create disproportionate and adverse effects given the high concentrations of minority and low-income populations potentially impacted. These impacts will be mitigated by the new bus line resuming service to the removed portion and with a comparable level of service. The proposed change could potentially create transfers for some riders. In effort to evaluate the impacts of the proposed route change, TriMet Service Planners launched an on-board survey to assess trip patterns. Surveying took place a week after school was back in session at PCC Rock Creek, from September 30 – October 7. The entire survey of 20 questions was available in English and Spanish. Thirteen other languages were available which asked three questions. There were no significant differences found when looking at the new route transfer question by race and income. Thus, the transfer created by the proposed Line 47 route change does not raise a high level of concern with respect to Title VI.

**Table 6: Summary of Disparate Impact and Disproportionate Burden Analysis Results**

		Potential Disparate Impact?	Potential Disproportionate Burden?
<b>Major Service Reduction</b>	47 – Main/Evergreen	<b>Yes</b>	<b>Yes</b>
	“N” – Baseline	<b>No</b>	<b>No</b>
	16 – Front Ave/St Helens Rd	<b>Yes</b>	<b>No</b>
	47 – Main/Evergreen	<b>No</b>	<b>Yes</b>
	87 – Airport Way/181st	<b>No</b>	<b>No</b>
<b>Major Service Increases</b>	155 – Sunnyside	<b>No</b>	<b>Yes</b>
	<i>Combined Improvements (System-level)</i>	<b>No</b>	<b>No</b>
<b>Other Major Service Changes</b>		–	–



**Attachment A: Analysis of impact on access to employment, education, health care, food, and parks/public recreation for minority and low-income populations**

### Line "N" – Baseline

New line connecting Hillsboro TC and Willow Creek TC

Creates new access  
  Improves access  
  Removes access  
  Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation
<b>MAINTAIN ACCESS</b>	<ul style="list-style-type: none"> <li>• <u>Maintains</u> access to an estimated <b>10,761 jobs</b></li> </ul> <p style="text-align: center;"> <span style="color: #003366;">■</span> Line "N" (Line 47 portion)                       <span style="color: #6699CC;">■</span> TriMet District                 </p>	<ul style="list-style-type: none"> <li>• Labor Ready Northwest Inc</li> <li>• Leadpoint Business Services</li> <li>• Convergence Services Group</li> </ul>	<ul style="list-style-type: none"> <li>• Portland Comm. College</li> <li>• Miller Education Center Options Program</li> <li>• Elite Truck School</li> </ul>	<ul style="list-style-type: none"> <li>• Virginia Garcia Hillsboro Health Center</li> <li>• Tuality Community</li> <li>• Hillsboro Senior Resource Center</li> <li>• Domestic Violence Resource Center</li> <li>• Lifeworks NW</li> <li>• De Paul Treatment Center</li> </ul>	<ul style="list-style-type: none"> <li>• Walgreens (2 locations)</li> <li>• Grocery Outlet</li> <li>• Supermercados Mexico Inc</li> <li>• Su Casa Imports</li> <li>• Winco Foods</li> </ul>	<ul style="list-style-type: none"> <li>• Hillsboro Swim Team</li> </ul>
<b>NEW ACCESS</b>	<ul style="list-style-type: none"> <li>• <u>Creates</u> access to an estimated <b>6,668 jobs</b></li> </ul> <p style="text-align: center;"> <span style="color: #003366;">■</span> Line "N" (Baseline portion)                       <span style="color: #6699CC;">■</span> TriMet District                 </p>	N/A	<ul style="list-style-type: none"> <li>• Raymond Arthur Brown Middle School</li> </ul>	<ul style="list-style-type: none"> <li>• Saving Grace Maternity Home</li> </ul>	<ul style="list-style-type: none"> <li>• Walmart</li> </ul>	N/A

\*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.

## Line 16 – Front Ave/St Helens Rd

*Adds Sunday Service*

Creates new access  
  Improves access  
  Removes access  
  Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
<p>• <u>Improves</u> access to an estimated <b>112,233 jobs</b></p> <table border="1" style="margin-top: 10px;"> <caption>Comparison of Job Access</caption> <thead> <tr> <th>Category</th> <th>Line 16</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>85%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>6%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> <span style="color: #003366;">■</span> Line 16                   <span style="color: #6699CC;">■</span> TriMet District             </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 16	TriMet District	Low/Medium Wage Jobs*	85%	53%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	6%	8%	<ul style="list-style-type: none"> <li>• New Avenues for Youth</li> <li>• Central City Concern</li> <li>• Bison Workforce Solutions</li> <li>• Emerald City Medical Staffing</li> <li>• Northwest Staffing Resources</li> <li>• Nonprofit Professionals Now</li> </ul>	<ul style="list-style-type: none"> <li>• Greenhouse Alternative High School</li> <li>• Oregon Council for Hispanic Advancement</li> <li>• Portland Community College</li> <li>• Metro Montessori at Childpeace</li> <li>• Epicodus</li> <li>• Floral Design Institute</li> </ul>	<ul style="list-style-type: none"> <li>• Impact NW</li> <li>• BCFS Health and Human Services</li> <li>• Coalition of Community Health Clinic</li> </ul>	<ul style="list-style-type: none"> <li>• Rite Aid (2 locations)</li> <li>• Safeway</li> <li>• St John Grocery Outlet</li> <li>• World Foods</li> <li>• CVS</li> </ul>	N/A
Category	Line 16	TriMet District															
Low/Medium Wage Jobs*	85%	53%															
Jobs Held by Workers of Color*	12%	13%															
Jobs Held by Hispanic/Latino Workers*	6%	8%															

### Line 47 – Main/Evergreen

Re-route and Weekday Frequency Increase

Creates new access    Improves access    Removes access    Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
<b>IMPROVES ACCESS</b>	<ul style="list-style-type: none"> <li>Improves access to an estimated <b>35,723 jobs</b></li> </ul> <table border="1"> <caption>Job Access Comparison for Line 47 (PCC to Orenco Station) vs TriMet District</caption> <thead> <tr> <th>Category</th> <th>Line 47 (PCC to Orenco Station)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>82%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>18%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p>Legend: ■ Line 47 (PCC to Orenco Station)   ■ TriMet District</p>	Category	Line 47 (PCC to Orenco Station)	TriMet District	Low/Medium Wage Jobs*	82%	53%	Jobs Held by Workers of Color*	18%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	N/A	<ul style="list-style-type: none"> <li>Portland Community College – Rock Creek</li> <li>Early College High School</li> </ul>	<ul style="list-style-type: none"> <li>Kaiser Permanente</li> <li>OHSU Doernbecher Pediatrics</li> </ul>	<ul style="list-style-type: none"> <li>Walgreens (3 locations)</li> <li>QFC</li> <li>Safeway</li> <li>Rite Aid</li> <li>India Supermarket</li> <li>CVS</li> <li>Trader Joes</li> </ul>	N/A
Category	Line 47 (PCC to Orenco Station)	TriMet District																
Low/Medium Wage Jobs*	82%	53%																
Jobs Held by Workers of Color*	18%	13%																
Jobs Held by Hispanic/Latino Workers*	9%	8%																
<b>NEW ACCESS</b>	<ul style="list-style-type: none"> <li>Creates access to an estimated <b>4,687 jobs</b></li> </ul> <table border="1"> <caption>Job Access Comparison for Line 47 (South Hillsboro) vs TriMet District</caption> <thead> <tr> <th>Category</th> <th>Line 47 (South Hillsboro)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>75%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>9%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>13%</td> <td>8%</td> </tr> </tbody> </table> <p>Legend: ■ Line 47 (South Hillsboro)   ■ TriMet District</p>	Category	Line 47 (South Hillsboro)	TriMet District	Low/Medium Wage Jobs*	75%	53%	Jobs Held by Workers of Color*	9%	13%	Jobs Held by Hispanic/Latino Workers*	13%	8%	N/A	<ul style="list-style-type: none"> <li>Century High School</li> <li>South Meadows Middle School</li> </ul>	<ul style="list-style-type: none"> <li>Saving Grace Maternity Home</li> <li>Coda</li> </ul>	<ul style="list-style-type: none"> <li>Walgreens (4 locations)</li> <li>Walmart</li> <li>Safeway</li> <li>Albertsons</li> </ul>	<ul style="list-style-type: none"> <li>Hillsboro Volleyball Club</li> </ul>
Category	Line 47 (South Hillsboro)	TriMet District																
Low/Medium Wage Jobs*	75%	53%																
Jobs Held by Workers of Color*	9%	13%																
Jobs Held by Hispanic/Latino Workers*	13%	8%																

\*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not “White Alone”. Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.

### Line 87 – Airport Way/181st

#### Weekday Span Improvements

Creates new access    Improves access    Removes access    Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation
<p>• <u>Improves</u> access to an estimated <b>64,790 jobs</b></p> <p><b>Low/Medium Wage Jobs*</b>    82% (Line 87) / 53% (TriMet District)</p> <p><b>Jobs Held by Workers of Color*</b>    14% (Line 87) / 13% (TriMet District)</p> <p><b>Jobs Held by Hispanic/Latino Workers*</b>    9% (Line 87) / 8% (TriMet District)</p> <p>■ Line 87    ■ TriMet District</p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	<ul style="list-style-type: none"> <li>• IRCO</li> <li>• Central City Concern</li> <li>• Human Solutions</li> </ul>	<ul style="list-style-type: none"> <li>• Centennial Middle School</li> <li>• Centennial High School</li> <li>• Mt Hood Community College</li> <li>• IRCO Africa House</li> </ul>	<ul style="list-style-type: none"> <li>• Wallace Medical Concern Rockwood</li> <li>• Vibra Speciality Hospital</li> <li>• NW Down Syndrom Support</li> <li>• Addictions Northwest</li> <li>• Human Solutions</li> </ul>	<ul style="list-style-type: none"> <li>• Safeway</li> <li>• Walgreens (2 locations)</li> <li>• Winco</li> <li>• Hong Phat Market</li> <li>• Izobilie Euro Foods</li> <li>• Parkrose Grocery Outlet</li> <li>• CVS</li> <li>• Tienda Y Carniceria La Tapatia</li> <li>• Rite Aid</li> <li>• Walmart</li> </ul>	<p>N/A</p>

## Line 155 – Sunnyside

Weekday Frequency Increase

Creates new access  
  Improves access  
  Removes access  
  Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
<p>• <u>Improves</u> access to an estimated <b>23,390 jobs</b></p> <table border="1" style="margin-top: 10px;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 155 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>77%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>4%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> <span style="color: #000080;">■</span> Line 155                   <span style="color: #6495ED;">■</span> TriMet District             </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 155 (%)	TriMet District (%)	Low/Medium Wage Jobs*	77%	53%	Jobs Held by Workers of Color*	4%	13%	Jobs Held by Hispanic/Latino Workers*	8%	8%	<ul style="list-style-type: none"> <li>• Central City Concern</li> </ul>	<ul style="list-style-type: none"> <li>• Clackamas Middle College</li> <li>• National Dialysis Medical School</li> </ul>	<ul style="list-style-type: none"> <li>• Sunnyside Health and Wellness Center</li> <li>• Kaiser Sunnyside</li> </ul>	<ul style="list-style-type: none"> <li>• Safeway</li> <li>• Walgreens (2 locations)</li> <li>• Natural Grocers</li> <li>• New Seasons</li> <li>• CVS</li> <li>• Rite Aid</li> </ul>	<ul style="list-style-type: none"> <li>• Clackamas United Soccer Club</li> <li>• North Clackamas Volleyball Club</li> </ul>
Category	Line 155 (%)	TriMet District (%)															
Low/Medium Wage Jobs*	77%	53%															
Jobs Held by Workers of Color*	4%	13%															
Jobs Held by Hispanic/Latino Workers*	8%	8%															



**Title VI Service Equity Analysis: FY2022 Annual Service Plan**  
**Department of Transit Equity, Inclusion, and Community Affairs**

**April 28, 2021**

## Executive Summary

TriMet is proposing to implement several service changes in summer 2020, fall 2021 and spring 2022. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an Equity Analysis any time Major Service Changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The service proposal includes Major Service Changes to eight bus lines. Thus, an analysis is required prior to the TriMet Board of Directors taking action.

### Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as well as the way in which TriMet conducts Equity Analyses. Major Service Changes are analyzed for both potential adverse effects and distribution of benefits. This is done at both the individual line-level and system-level, and the analysis seeks to identify any potential disparities based on race/ethnicity or income.

### Major Service Changes

The proposed changes to eight existing lines meet TriMet's established thresholds for Major Service Changes:

- New Line – NW Thurman Street
- Line 11 – Rivergate/Marine Dr
- Line 15 – Belmont/NW 23rd
- Line 19 – Woodstock/Glisan
- Line 32 – Oatfield
- Line 63 – Washington Park/Arlington Hts
- Line 93 – Tigard/Sherwood
- Line 94 – Pacific Hwy/Sherwood

### Findings

1. The 4 major service increases resulted in a **system level disparate impact**.
2. **No system level disproportionate burden** for the 4 major service increases.
3. All improvements are on lines in service areas with **below average minority populations**. However, two of the three improvements will expand the service area for minority populations. Thus, **this would not indicate a potential Disparate Impact** after further examination.
4. All improvements are on lines in areas with **average-or-above low-income populations**. As a result, a greater share of the region's low-income populations stand to **benefit** as compared to higher income populations.
5. **No system level disparate impact or disproportionate burden** for the 4 major service decreases.
6. **Adverse effect** from the major service reduction (Line 11) for minority populations. The service area is above the disparate impact threshold and the level of alternative service is limited for three of the ten stops. Conversely, the low-income populations in this service area is below the disproportionate burden threshold. Therefore, adverse effect does not apply for low-income populations.



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**Attachment A:** Analysis of impact on access to employment, education, health care, food, and parks/public recreation for minority and low-income populations.

## I. Background

Due to the Covid-19 pandemic of 2020, TriMet's Annual Service Plan for FY2022<sup>1</sup> proposes Major Service Changes to eight bus lines that focused on cost neutral/cost saving route and service changes. Other changes will involve changes to improve reliability, travel time, and improvements to on-time performance for lines. Though these changes will represent improvements or reductions for riders on those lines, they are not large enough to be reviewed as Major Service Changes. The Major Service Changes presented here represent the majority of TriMet's proposed changes for FY22.

This report documents the equity analysis conducted for these changes.

## II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration ("FTA") financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

*"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."*

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B ("Circular"). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations as well as minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

TriMet's Title VI Program<sup>2</sup> outlines the agency's policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as set forth below.

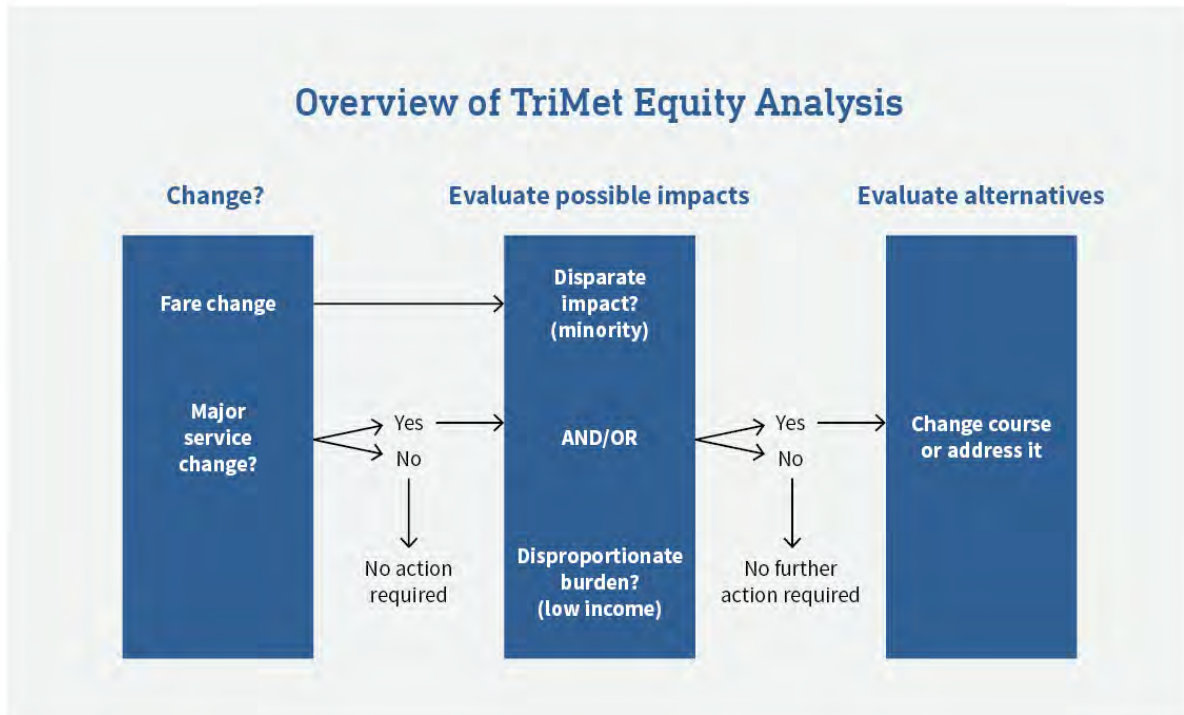
### A. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the Board for its consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

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<sup>1</sup> Fiscal year 2022 runs from July 1, 2021 to June 30, 2022.

<sup>2</sup> TriMet's Title VI Program was updated and submitted to FTA in fall 2019



**Figure 1: Overview of TriMet's Title VI Equity Analysis process**

A **Major Service Change** is defined as:

1. A change to **15% or more of a line's route miles**. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of **15% or more to a line's span** (hours) of service on a daily basis for the day of the week for which a change is made, or;
3. A change of **15% or more to a line's frequency** of service on a daily basis for the day of the week for which a change is made, or;
4. A single transit line is **split** into two or more transit lines,
5. A transit line is retired or eliminated from service, or;
6. A **new transit line** is established.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis

## B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the benchmarks established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (span in days and/or hours, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disparate impact associated with service changes is defined separately for impacts of changes on an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
  - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 33 percent compared to 30 percent).
  - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district’s minority population that is impacted is compared to the percentage of the TriMet district’s non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.

2. In the event of service improvements:

- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
  - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
  - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 27 percent compared to 30 percent).
- b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.

3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

### C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

## III. Proposed Service Changes

### A. Description of Changes

Table 1 lists the proposed service changes by the quarter in which they would take effect.

**Table 1: Proposed Service Changes in FY 2022 Annual Service Plan**

Quarter	Line	Service Change Description
Fall 2021	New Line – NW Thurman St	➤ New Transit Line
	Line 11 – Rivergate/Marine Dr	➤ Remove service from Rivergate
	Line 15 – Belmont/NW 23rd (Thurman St)	➤ Reduce frequency ➤ Reduce weekday span ➤ Eliminate weekend service
	Line 19 – Woodstock/Glisan (Rex Loop)	➤ Reduce frequency on weekday ➤ Remove all service on weekends
	Line 32 - Oatfield	➤ Extend service to Beaver creek Rd and Meyers Rd
	Line 63 - Washington Park/Arlington Hts	➤ Discontinue service to the Oregon Zoo ➤ Extend service into Downtown Portland
	Line 93 - Tigard/Sherwood	➤ Retire Line
	Line 94 - Pacific Hwy/Sherwood	➤ Resume weekend service for the Line 93
Spring 2022	Line 11 – Rivergate/Marine Dr	➤ Remove service from segment of Marine Drive ➤ Add service to Delta Park

*Note: The FY22 Annual Service Plan also includes minor changes to line 15, 19, 39, 51, 66, 75, and 77. These changes are not included in this analysis because they are too small to reach the Major Service Change threshold.*

### B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed service are compared in terms of route length, frequency, and span (hours) of service. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over the course of three years.

Results of the comparison are shown in Table 2. To summarize, these changes meet TriMet’s adopted Title VI Major Service Change definition:

- New Line – NW Thurman St:** New Transit Line
- Line 11 – Rivergate/Marine Dr:** Route length decrease over 15%
- Line 15 – Belmont/NW 23rd:** Frequency decrease over 15%, span decrease over 15% on weekdays, and span decrease over 15% on weekends
- Line 19 – Woodstock/Glisan:** Frequency decrease of over 15% on weekdays and span decrease over 15% on weekends
- Line 32 – Oatfield:** Route length increase over 15%
- Line 63 – Washington Park/Arlington Hts:** Route length increase over 15%
- Line 93 – Tigard/Sherwood:** Retire Line
- Line 94 – Pacific Hwy/Sherwood:** Resume Line 93 service

**Table 2: Results of Major Service Change Test By Line**

Line	Change in Route Length	Change in Span	Change in Frequency	Line Split	Retired Line	New Line or New Service
<b>New Line - NW Thurman</b>						✓
<b>Line 11 - Rivergate/Marine Dr</b>	-19%					
<b>Line 15 - Belmont/NW 23rd</b>		-15%	-15%			
<b>Line 19 - Woodstock/Glisan</b>		-15%	-15%			
<b>Line 32 - Oatfield</b>	+19%					
<b>Line 63 - Washington Park/Arlington Hts</b>	-59% +109%*					
<b>Line 93 - Tigard/Sherwood</b>					✓	
<b>Line 94 - Pacific Hwy/Sherwood (Resume Line 93)</b>						✓

**C. Line-level Analyses**

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and service increases are analyzed. For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations. The line-level analysis compares minority and low-income populations for the service area of each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. Major Service Reduction
2. Major Service Increases
3. Other Major Service Changes

**1. Major Service Reduction**

For service reductions, the analysis examines whether *adverse effects* (defined on pg. 3) are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line’s minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The proposal includes four Major Service Reductions in this service plan.

➤ **Line 11** (Route realignment, including stop removals)

The Line 11 includes several route changes. The first is to end the eastbound route at Delta Park MAX station, returning to Marine Dr. via North Hayden Meadows Rd. and Union Ct. This change removes service from low ridership portions of Marine Dr. and NE Middlefield Road. This also provides access to Safeway on North Hayden Meadows Rd. for residents of the Bybee Lakes Hope Center. The second change is to remove a portion of the westbound line along N Rivergate Blvd and N Ramsey Blvd in order to bring faster and more efficient service to N Lombard and N Marine Dr. Doing so would remove Line 11 service from a total of 15 stops, including both directions of service. As shown in Figures 2 and 3, the population in the surrounding areas are above the Disparate Impact threshold (33%) for Major Service Reductions. Thus, this change is flagged for potential line-level Disparate Impact. As shown in Table 3, three out of the 10 stops will not have comparable service within ¼ mile; therefore, adverse effect does apply to the removal of those stops. Additionally, these stops see low to moderate activity, with a total of twenty-two ons/offers per weekday as of spring 2020. It should be noted there were forty-six on/off per weekday as of spring 2019 (pre-COVID).

As shown in Table 4, the five stops will not have comparable service within ¼ mile; therefore, adverse effect does apply. There is not a Disproportionate Burden because the population in these areas are below the threshold (22%); therefore, adverse effect does not apply. It should also be noted that these stops see no activity, with a total of zero ons/offers per weekday as of spring 2020 and there are no residences along N. Rivergate Blvd. Therefore, adverse effect does not apply.

	No. of Stops	Total daily ons/offers (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	10	46	34%	21.8%
<i>Nearest comparable service</i>				
Less than ¼ mile	7	24	34%	N/A
Over ¼ mile*	3	22	34%	N/A

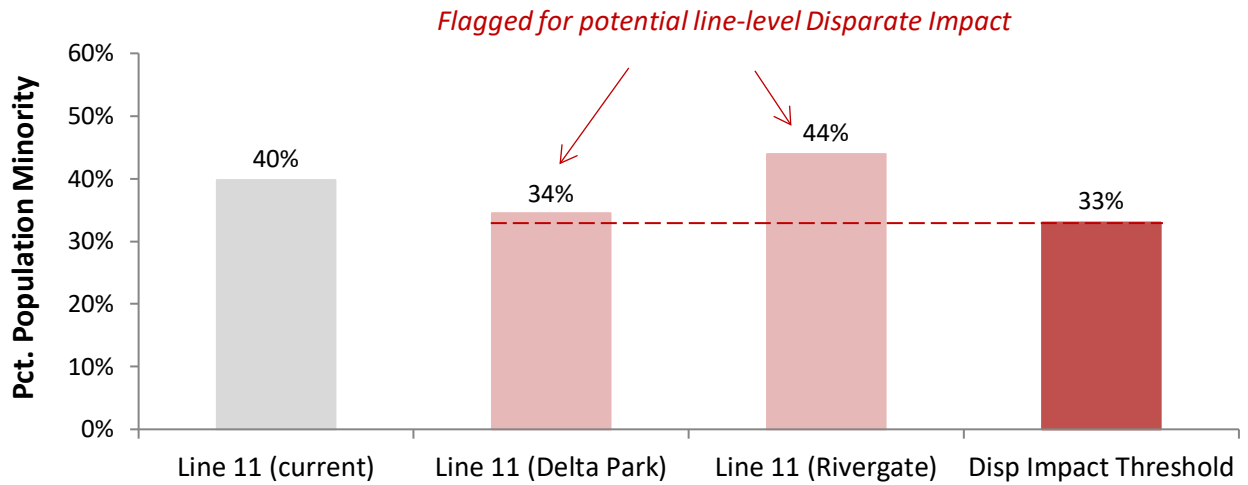
\*Adverse effect applies

	No. of Stops	Total daily ons/offers (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	5	0	44%	21%
<i>Nearest comparable service</i>				
Less than ¼ mile	0	0	0%	0%
Over ¼ mile*	5	0	N/A	N/A



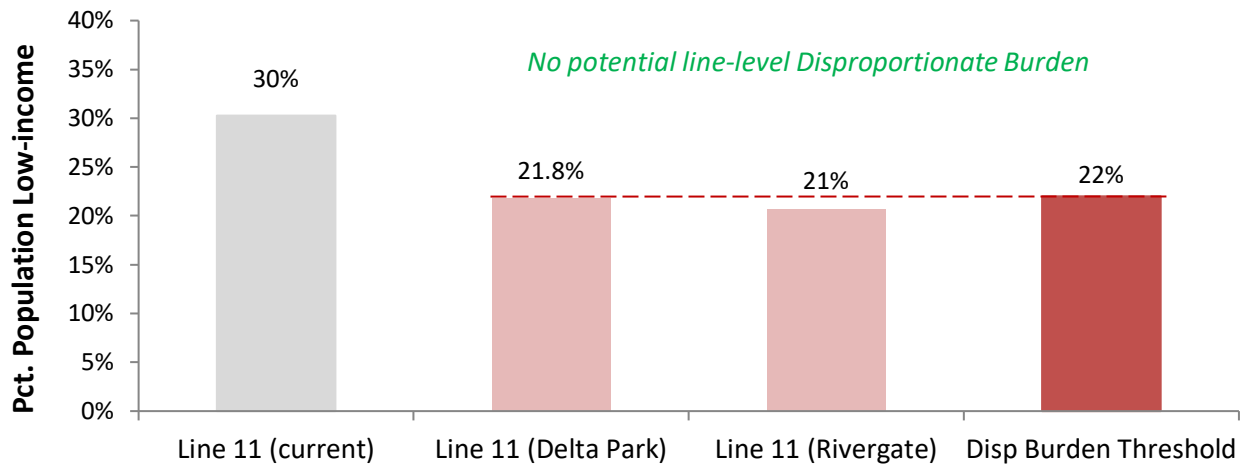
\*Adverse effect applies

**Figure 2: Minority Population Comparison**  
Proposed Line 11 Major Service Reduction



Source: 2014-2018 American Community Survey, block group level

**Figure 3: Low-income Population Comparison**  
Proposed Line 11 Major Service Reduction



Source: 2014-2018 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

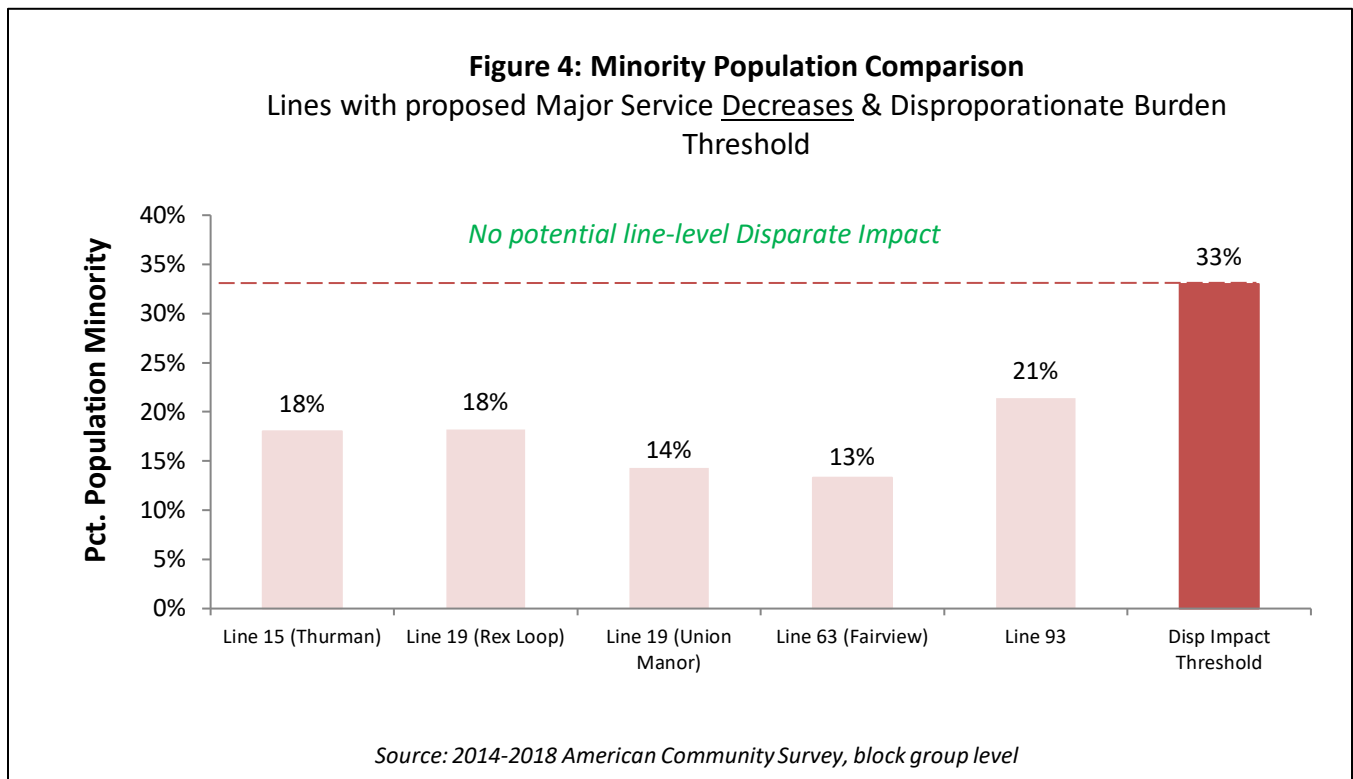
In terms of access<sup>3</sup>, this change would remove service from the Line 11 (Delta Park) to:

- About 14,751 jobs
  - 48% are low-to-medium wage jobs, which is below the TriMet district average
  - 18% are jobs held by minorities, which is above the TriMet district average
  - 12% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 parks/public recreation

In terms of access, this change would remove service from the Line 11 (Rivergate) to:

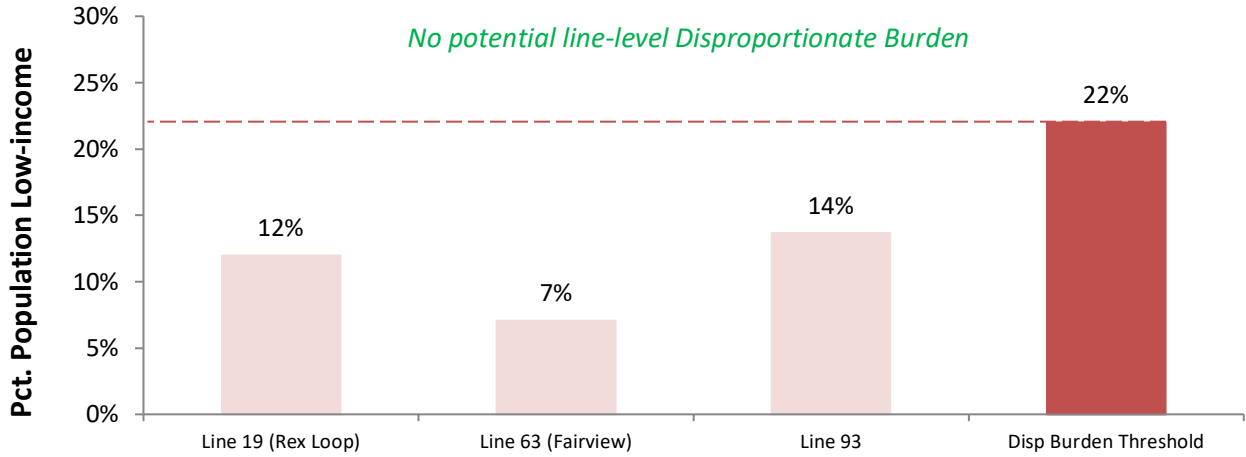
- About 14,295 jobs
  - 48% are low-to-medium wage jobs, which is below the TriMet district average
  - 13% are jobs held by minorities, which is above the TriMet district average
  - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 employment resource center

Figure 4 displays the minority population along each line proposed for a major decrease as compared to the 33% Disparate Impact threshold. Figure 5 displays the low-income population along each line as compared to the 22% Disproportionate Burden threshold. Because these are proposed service decreases, protected populations falling above these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows.



<sup>3</sup> Access defined as within ¼ mile of a stop on the line. For full details of access to services by line, see Attachment A.

**Figure 5: Low-income Population Comparison**  
 Lines with proposed Major Service Decreases & Disproportionate Burden  
 Threshold



Source: 2014-2018 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

➤ **Line 15** (Reduce weekday frequency and span and eliminate weekend service on NW Thurman St)

The proposed changes for this line would potentially burden a service area population that is 18% minority and 8% low-income, which are both well below the Disparate Impact (33%) and Disproportionate Burden (22%) thresholds for Major Service Decreases. Thus, there is no Disparate Impact and no Disproportionate Burden at the line-level.

In terms of access, this change would reduce service from the Line 15 to:

- About 7,559 jobs
  - 40% are low-to-medium wage jobs, which is below the TriMet district average
  - 14% are jobs held by minorities, which is above the TriMet district average
  - 7% are jobs held by Hisp./Latino workers, which is below the TriMet district average
- 1 grocery store/supermarket
- 1 human and social services center

➤ **Line 19** (Reduce weekday frequency and weekend service on the Rex Loop)

The proposed changes for this line would potentially burden a service area population that is 18% minority and 12% low-income, which are both well below the Disparate Impact (33%) and Disproportionate Burden (22%) thresholds for Major Service Decreases. Thus, there is no Disparate Impact and no Disproportionate Burden at the line-level.

In terms of access, this change would remove service from the Line 19 to:

- About 161 jobs
  - 59% are low-to-medium wage jobs, which is above the TriMet district average
  - 9% are jobs held by minorities, which is below the TriMet district average
  - 10% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 human and social services center

➤ **Line 19** (*Reduce weekday span to Union Manor*)

The proposed changes for this line would potentially burden a service area population that is 18% minority and 12% low-income, which are both well below the Disparate Impact (33%) and Disproportionate Burden (22%) thresholds for Major Service Decreases. Thus, there is no Disparate Impact and no Disproportionate Burden at the line-level.

In terms of access, this change would remove service from the Line 19 to:

- About 373 jobs
  - 70% are low-to-medium wage jobs, which is above the TriMet district average
  - 15% are jobs held by minorities, which is above the TriMet district average
  - 10% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 human and social services center
- 1 employment resource center

➤ **Line 63** (*Remove service to Oregon Zoo*)

The removed service for this line would potentially burden a service area population that is 13% minority and 7% low-income, which are both well below the Disparate Impact (33%) and Disproportionate Burden (22%) thresholds for Major Service Decreases. Thus, there is no Disparate Impact and no Disproportionate Burden at the line-level.

In terms of access, this change would remove<sup>4</sup> service from the Line 63 to:

- About 1,225 jobs
  - 52% are low-to-medium wage jobs, which is above the TriMet district average
  - 12% are jobs held by minorities, which is below the TriMet district average
  - 5% are jobs held by Hisp./Latino workers, which is below the TriMet district average
- 3 parks/public recreation

➤ **Line 93** (*Route elimination*)

The retirement of this line would potentially burden a service area population that is 21% minority and 14% low-income, which are both well below the Disparate Impact (33%) and Disproportionate Burden (22%) thresholds for Major Service Decreases. Thus, there is no Disparate Impact and no Disproportionate Burden at the line-level. It should be noted that the service and frequency to these stops will continue to be served by the Line 94.

In terms of access, the Line 94 would resume service to:

- About 44,222 jobs

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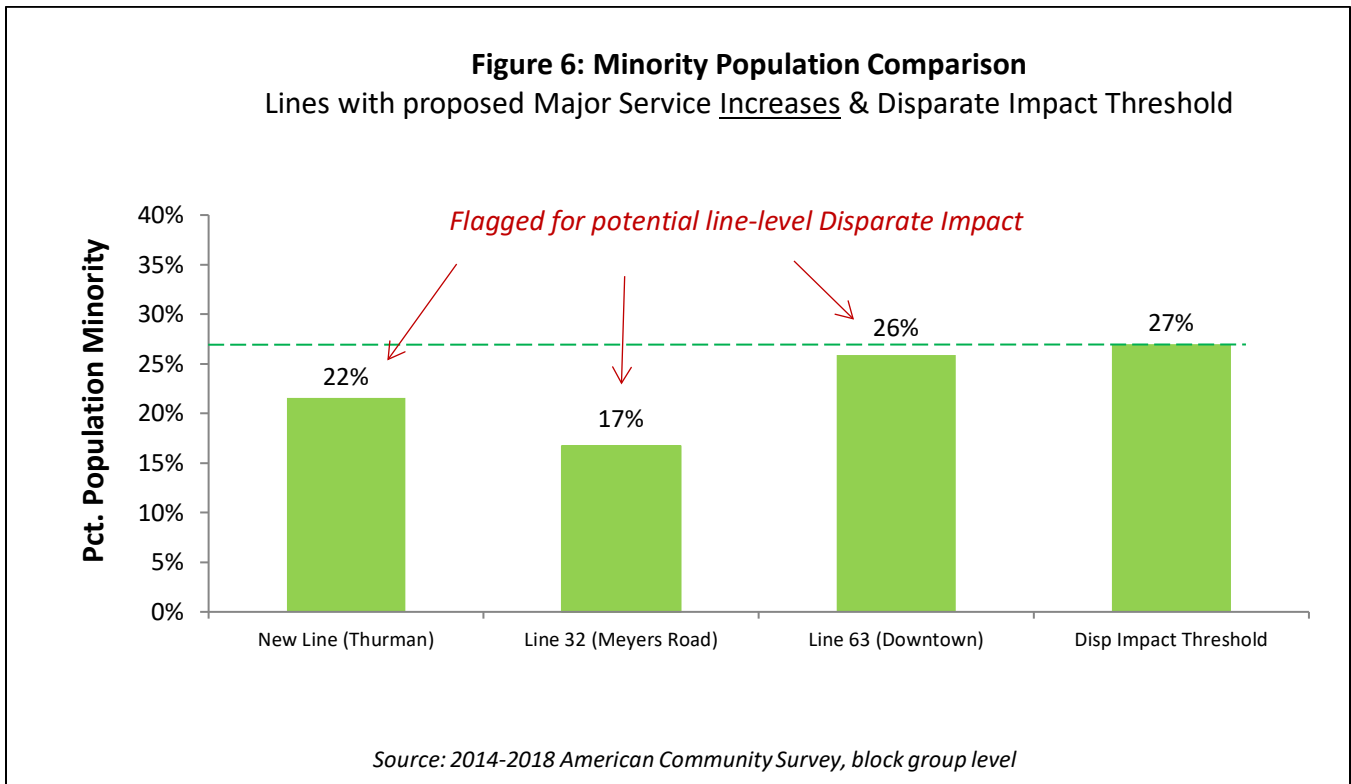
<sup>4</sup> Service will be provided by the Explore Washington Park shuttle

- 54% are low-to-medium wage jobs, which is above the TriMet district average
- 14% are jobs held by minorities, which is above the TriMet district average
- 13% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 9 grocery stores/supermarkets
- 6 employment resource centers
- 7 human and social services centers
- 1 middle school

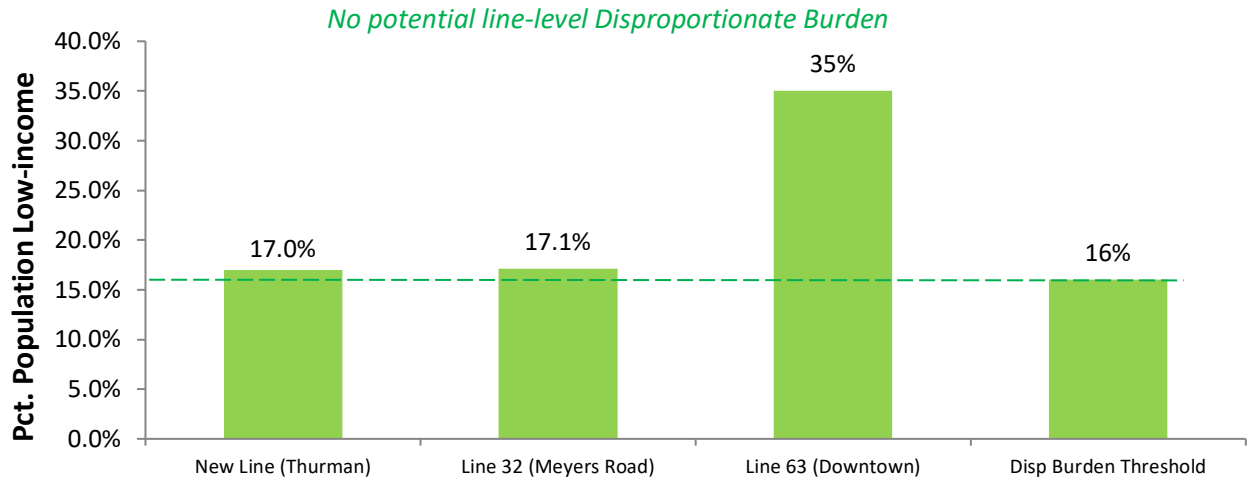
## 2. Major Service Increases

For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

Figure 6 displays the minority population along each line proposed for a major increase as compared to the 27% Disparate Impact threshold. Figure 7 displays the low-income population along each line as compared to the 16% Disproportionate Burden threshold. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, food and parks/public recreation for minority and low-income populations.

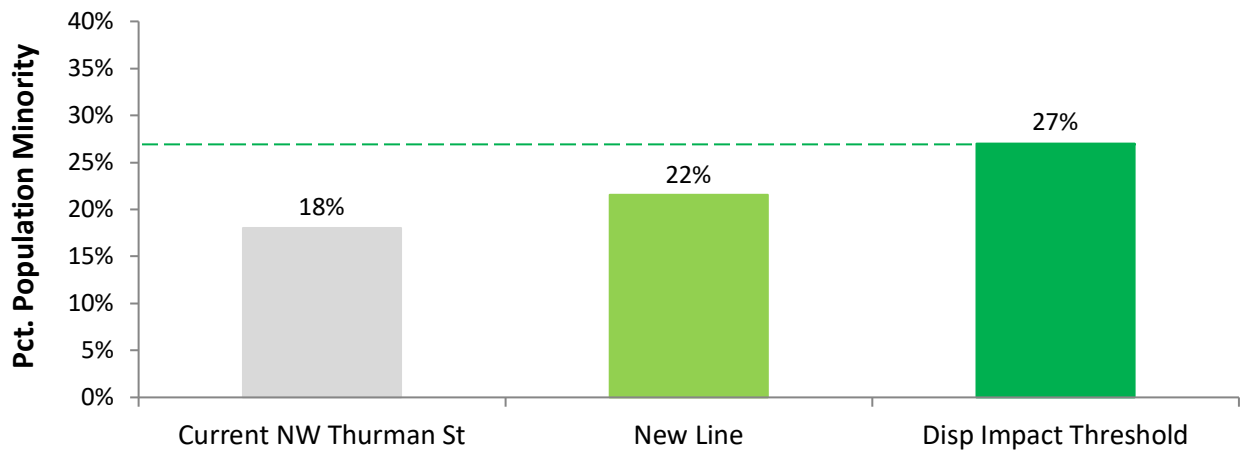


**Figure 7: Low-income Population Comparison**  
 Lines with proposed Major Service Increases & Disproportionate Burden  
 Threshold



Source: 2014-2018 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

**Figure 8: Minority Population Comparison**  
 Proposed Line 15 Major Service Increase



Source: 2014-2018 American Community Survey, block group level

➤ ***New Line – NW Thurman St*** (New bus line)

The new bus line will resume service on NW Thurman St from NW 23rd and to NW Gordon from the Line 15, providing new service on 18th and 19th and ending near Providence Park. As shown in Figure 8, the current service area population is **18% minority**. The proposed routing for this new line would potentially benefit a service area population that is **22% minority**. Although the new line is below the Disparate Impact threshold (27%) for Major Service Increases, the new line will expand the service area for minority populations by 4 percentage points. Thus, **this would not indicate a potential Disparate Impact** after further examination. The service area population is **17% low-income**, which is above the Disproportionate Burden threshold (16%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level.

In terms of access, this line change would provide new service to:

- About 8,783 jobs
  - 59% are low-to-medium wage jobs, which is much greater than the TriMet district average
  - 14% are jobs held by minorities, which is above the TriMet district average
  - 8% are jobs held by Hisp/Latino workers, which is similar to the TriMet district average
- 1 grocery store/supermarket
- 1 human and social services center

In terms of access, this line would maintain service from the Line 15 to:

- About 7,559 jobs
  - 40% are low-to-medium wage jobs, which is below the TriMet district average
  - 14% are jobs held by minorities, which is above the TriMet district average
  - 7% are jobs held by Hisp./Latino workers, which is below the TriMet district average
- 1 high school
- 9 grocery stores/supermarkets
- 3 human and social services centers

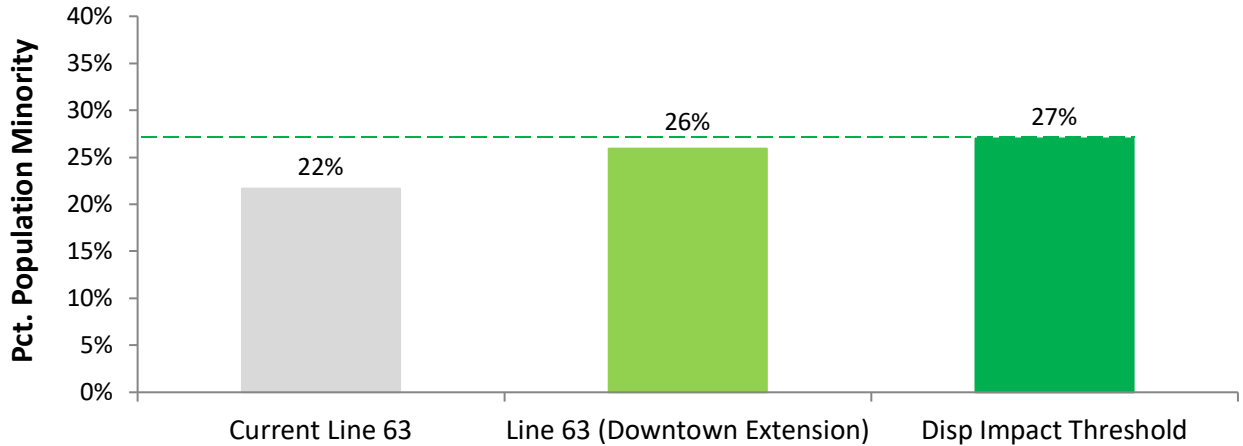
➤ ***Line 32 – Oatfield*** (Route change)

This proposed route change would extend service for Line 32 riders. This service increase to the Beaver Creek Rd portion would potentially benefit a service area population that is **17% minority**, which is below the Disparate Impact threshold (27%) for Major Service Increases. This indicates a **potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section. However, it is important to note that this change would serve the Oregon City High School, which has a minority student population of 23%. The service area population is **17% low-income**, which is above the Disproportionate Burden threshold (16%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level.

In terms of access, this line change would provide new service to:

- About 3,253 jobs
  - 61% are low-to-medium wage jobs, which is much greater than the TriMet district average
  - 8% are jobs held by minorities, which is below the TriMet district average
  - 8% are jobs held by Hisp/Latino workers, which is similar to the TriMet district average
- 1 high school and 1 human and social services center
- 2 employment resource centers

**Figure 9: Minority Population Comparison**  
Proposed Line 63 Major Service Increase



Source: 2014-2018 American Community Survey, block group level

➤ **Line 63 – Washington Park/Arlington Hts (Route change)**

As shown in Figure 9, the current service area population is **22% minority**. The proposed route change would extend service and potentially benefit a service area population that is **26% minority**. Although the service area population is below the Disparate Impact threshold (27%) for Major Service Increases, the downtown extension increases the service area for minority populations by 4 percentage points. Thus, **this would not indicate a potential Disparate Impact** after further examination. The service area population is **35% low-income**, which is well above the Disproportionate Burden threshold (16%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level.

In terms of access, this line change would provide new service to:

- About 64,360 jobs
  - 37% are low-to-medium wage jobs, which is much lower than the TriMet district average
  - 14% are jobs held by minorities, which is above the TriMet district average
  - 7% are jobs held by Hisp/Latino workers, which is slightly below the TriMet district average
- 1 high school and 1 college
- 7 human and social services center
- 12 employment resource centers
- 3 grocery stores/supermarkets

➤ **Line 94 – Pacific Hwy/Sherwood (New weekend service)**

This service increase would potentially benefit a service area population that is **22% minority** the Disparate Impact threshold (27%) for Major Service Increases. **This indicates a potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided



in the next section. The service area population is **17% low-income**, which is above the Disproportionate Burden threshold (16%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level. The new weekend service will resume service from the retired Line 93 and continue with the existing 30-minute frequency from Sherwood to Tigard.

In terms of access, service would be maintained from the Line 93 to:

- About 44,222 jobs
  - 54% are low-to-medium wage jobs, which is above the TriMet district average
  - 14% are jobs held by minorities, which is above the TriMet district average
  - 13% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 9 grocery stores/supermarkets
- 6 employment resource centers
- 7 human and social services centers
- 1 middle school

### **3. Other Major Service Changes**

There are no Other Major Service Changes

## **D. System-level Analysis**

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

### ➤ ***System-level Disparate Impact Analysis: Major Service Increases***

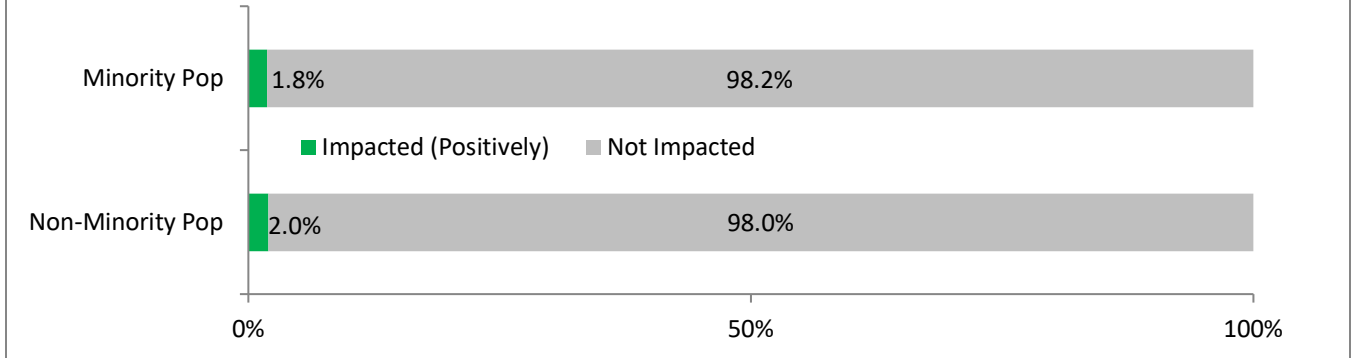
The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District's minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District's non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District's minority than non-minority population stood to benefit from the improvements.

Table 5 and Figure 10 compare the positively impacted minority and non-minority populations. A lower percentage of the District's minority population stands to benefit by the proposed Major Service Increase compared to the non-minority population (1.8% vs. 2%, respectively). Therefore, ***no System-level Disparate Impact*** is found related to the proposed Major Service Increases.

**Table 5: System-level Disparate Impact Analysis of Major Service Increases**

Pct. of TriMet District Non-Minority Pop Positively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Positively Impacted	Potential Disparate Impact?
2%	Less than 1.6%	1.8%	Yes

**Figure 10: System-level Impacts of Proposed FY22 Major Service Improvements**  
Minority and Non-minority Populations



➤ **System-level Disproportionate Burden Analysis: Major Service Increases**

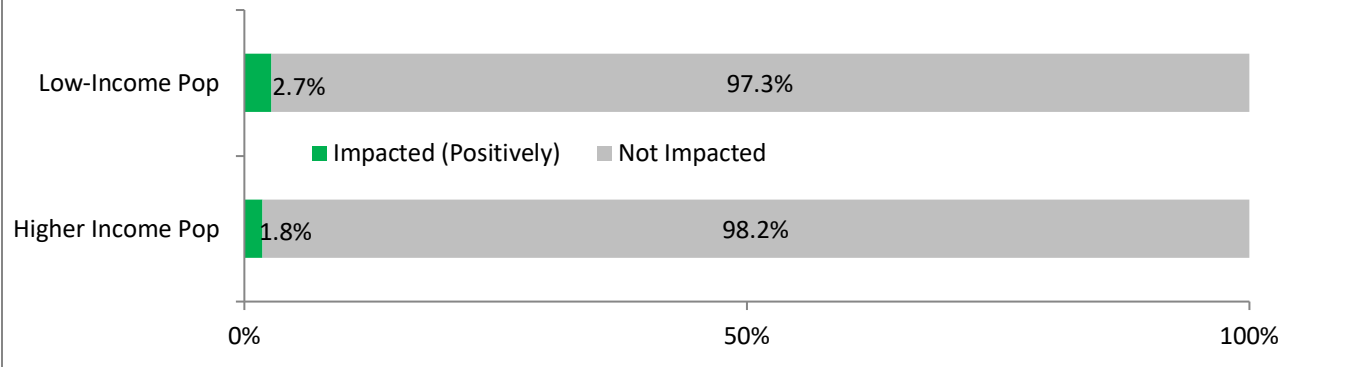
The System-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Increases, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s low-income than higher income population stands to benefit from the improvements.

Table 6 and Figure 11 compare the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Increases as compared to the higher income population (2.7% vs. 1.8%, respectively). Therefore, *no System-level Disproportionate Burden* is found related to the proposed Major Service Increases.

**Table 6: System-level Disproportionate Burden Analysis of Major Service Increases**

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-Income Pop Disparate Impact Threshold	Pct. of TriMet District Low Income Pop Positively Impacted	Potential Disproportionate Burden?
1.8%	Less than 1.5%	2.7%	No

**Figure 11: System-level Impacts of Proposed FY22 Major Service Increases**  
Low-income and Higher Income Populations



➤ **System-level Disparate Impact Analysis: Major Service Reductions**

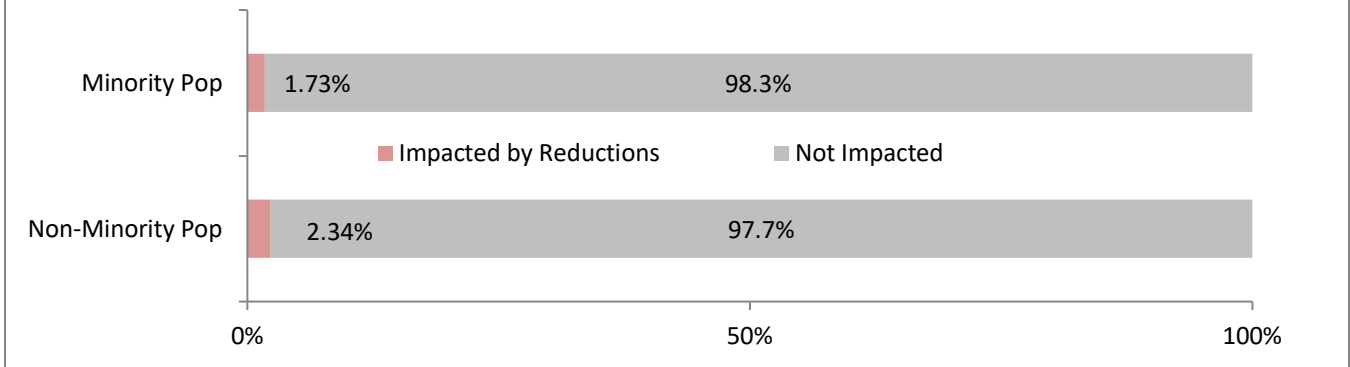
The system-level Disparate Impact analysis of Major Service Reductions is completed by determining what proportion of the TriMet District’s minority population is potentially adversely impacted from the service reductions and comparing that to the District’s non-minority population that may be adversely impacted. A potential Disparate Impact would exist if minority populations were impacted substantially more by service reductions than non-minority populations. The way we measure this is to test whether 20% more of the District’s minority than non-minority population were impacted by the service reductions.

Table 7 and Figure 12 compare the impacted minority and non-minority populations. A greater percentage of the District’s non-minority population is potentially impacted by the proposed Major Service Reductions as compared to the minority population (2.34% vs. 1.73%, respectively). Therefore, ***no system-level Disparate Impact is found related to the proposed Major Service Reductions.***

**Table 7: System-level Disparate Impact Analysis of Major Service Decreases**

Pct. of TriMet District Non-Minority Pop Negatively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Negatively Impacted	Potential Disparate Impact?
2.34%	More than 2.8%	1.73%	No

**Figure 12: System-level impacts of proposed FY22 Major Service Reductions  
Minority and Non-minority Populations**



➤ **System-level Disproportionate Burden Analysis: Major Service Reductions**

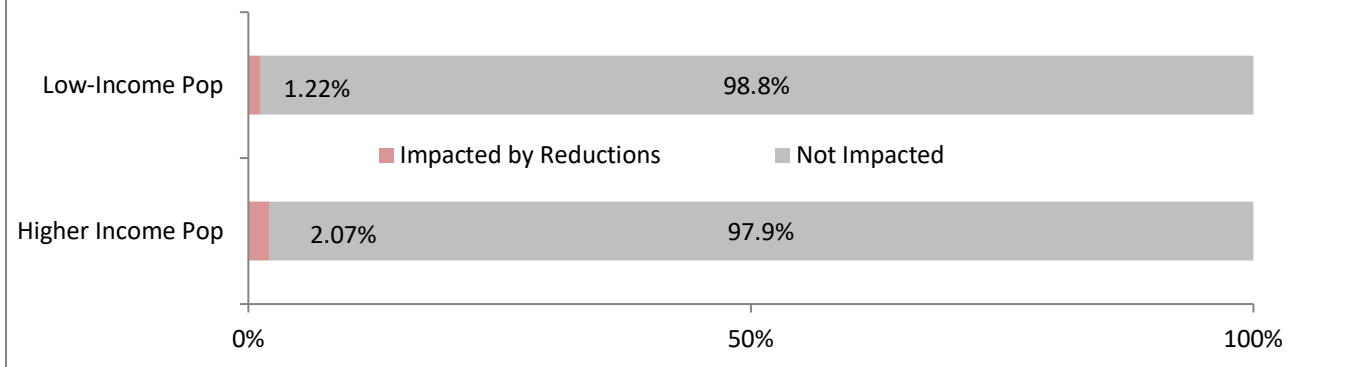
The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is potentially adversely impacted from the service reductions and comparing that to the District’s higher income population that may be adversely impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations were impacted substantially more by service reductions than higher income populations. The way we measure this is to test whether 20% more of the District’s low-income than higher income population were impacted by the service reductions.

Table 8 and Figure 13 compare the impacted low-income and higher income populations. A greater percentage of the District’s higher income population is potentially impacted by the proposed Major Service Reductions as compared to the low-income population (2.07% vs. 1.22%, respectively). Therefore, *no system-level Disproportionate Burden is found related to the proposed Major Service Reductions.*

**Table 8: System-level Disproportionate Burden Analysis of Major Service Decreases**

Pct. of TriMet District Higher Income Pop Negatively Impacted	Low-Income Pop Disparate Impact Threshold	Pct. of TriMet District Low Income Pop Negatively Impacted	Potential Disproportionate Burden?
2.07%	More than 2.5%	1.22%	No

**Figure 13: System-level impacts of proposed FY22 Major Service Reductions**  
Low-income and Higher Income Populations



#### IV. Community Engagement

The service proposals analyzed in this report speed up the bus system by addressing low ridership deviations and extensions, remedy safety issues, and/or increase coverage. All proposals aim to cost neutrally improve the experience for customers and/or increase efficiency at a time when revenues are declining.<sup>5</sup>

An initial FY22 service plan was developed in fall 2020, at which point TriMet posted the proposed changes on [trimet.org](https://trimet.org) to solicit feedback, placed advertisements in newspapers across the service district, posted signs at bus stops and sent postcards with language translations (Spanish, Chinese, Vietnamese, Japanese, Tagalog, Russian, Arabic, and Ukrainian) to nearby residents of lines with proposed routing changes, presented the proposal to the Transit Equity Advisory Committee, sent emails to riders and other stakeholders, and staff held two TriMet Virtual Open Houses in English and Spanish on October 28<sup>th</sup> and October 29<sup>th</sup>, respectively. Based on feedback received, TriMet modified the plan by:

1. Adding the proposed new line on NW Thurman Street,
2. Continuing to serve SE 23rd to Union Manor via Line 19 with hourly trips seven days a week between 9 a.m. and 3 p.m. and serve the SE 28th/Rex/32nd loop with two morning trips to Downtown Portland and two afternoon trips from Downtown Portland for students and commuters on weekdays,
3. Extending the Line 32 onto Meyers Rd to serve Oregon City High School, and
4. Combining Lines 93 and 94 into one line serving the City of Sherwood to Downtown Portland and maintaining the Line 93 thirty-minute frequency weekend service from Sherwood to Tigard.

For the second phase of outreach, TriMet will hold two virtual open houses in February 2021 to solicit feedback about any updates to the proposal. Many elements of the initial outreach phase will be repeated (postcards, newspaper advertisements, emails). Finally, TriMet will hold a public hearing at its March 24, 2021 board meeting to receive comments on the proposed service changes.

<sup>5</sup> For more information, go to <https://trimet.org/betterbus/servicechanges-fy22>

The following is a summary of themes across the feedback received: *[This section will be completed once all public input is reviewed and the TriMet board of directors has been made aware and considered this service proposal and equity analysis.]*

## V. Summary of Findings

Table 9 on the next page summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses. As shown, there are several disparate impacts with the service increases portion of the proposed FY22 Annual Service Plan. All four improvements will serve areas with relatively low minority populations as compared to the TriMet district. After further consideration, improving service on these lines does not raise a high concerns for inequitable distribution of benefits for minority populations. That is, two of the four lines (New Line and Line 63) will both increase their respective service area for minority populations compared to their current service areas. The Line 32 extension will increase access to the Oregon City High School, which has a higher percentage of minority students (23%) and the Line 94 will resume service for the Line 93. On the other hand, the proposal does not raise concerns of an inequitable distribution of benefits for low-income populations. That is, the proposed improvements did not have any line-level Disproportionate Burdens and there were no system-level impacts.

The proposed route reduction to the Line 11 does appear to create a potential adverse effect given the high concentration of minority populations potentially impacted. For the Delta Park stops, there is a comparable level of service for seven out of 10 stops being removed. Additionally, TriMet is partnering with the City of Portland to add safe and accessible stops for Line 6 on N Vancouver Way at N Marine Way to improve connections to the Bridgeton neighborhood in effort to minimize some of the impacts of the discontinued service. However, three out of the 10 stops will not have comparable or alternative service within ¼ mile; therefore, adverse effect does apply to the removal of those stops. To that end, TriMet has made the decision to take no additional action and move forward as planned. This decision is based on the following reasons:

- The balance of benefits to minority populations across many MAX stations and bus stop compared to the negative impacts to the populations near three bus stops is overall positive.
- Other options carry large on-going operations costs, taking operating resources away from other services that could serve larger populations.
- The bus stop pairs of most concern has comparatively low ridership.

These reasons serve as the substantial legitimate justification for why avoiding, minimizing, or mitigating for the adverse effect is not practicable, per FTA guidelines.

For the N. Rivergate Blvd stops, there are no residences along N. Rivergate Blvd. and the stops being removed see no activity at all as of spring 2020. Therefore, adverse effect does not apply. The three remaining proposed service reductions on Line 15, 19, and 63 do not appear to create adverse effects given the low concentrations of minority and low-income populations. Overall, reducing service on these lines does not raise concerns of an inequitable distribution of burdens for minority and low income populations given the results of the line-level and system-level analysis.

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<sup>6</sup> <https://www.publicschoolreview.com/oregon-city-senior-high-school-profile>

**Table 9: Summary of Disparate Impact and Disproportionate Burden Analysis Results**

		Potential Disparate Impact?	Potential Disproportionate Burden?
<b>Major Service Reduction</b>	11 - Rivergate/Marine Dr	Yes	No
	19 - Woodstock/Glisan	No	No
	63 - Washington Park/Arlington Hts	No	No
	93 - Tigard/Sherwood	No	No
	<b>Combined Reductions (System-level)</b>	No	No
<b>Major Service Increases</b>	New Line - Thurman	No	No
	32 - Oatfield	Yes	No
	63 - Washington Park/Arlington Hts	No	No
	94 - Pacific Hwy/Sherwood	No	No
	<b>Combined Improvements (System-level)</b>	No	No
<b>Other Major Service Changes</b>	-	-	

**Attachment A: Analysis of impact on access to employment, education, health care, food, and parks/public recreation for minority and low-income populations**



### Line 11 – Rivergate/Marine Drive

*Route length decrease*

Creates new access  
  Improves access  
  Removes access  
  Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
<b>Delta Park</b>	<ul style="list-style-type: none"> <li>Removes access to an estimated <b>14,751 jobs</b></li> </ul> <table border="1"> <caption>Job Characteristics Comparison (Delta Park)</caption> <thead> <tr> <th>Category</th> <th>Line 11 (Delta Park portion)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>48%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>18%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p> <span style="color: red;">■</span> Line 11 (Delta Park portion)                   <span style="color: blue;">■</span> TriMet District             </p>	Category	Line 11 (Delta Park portion)	TriMet District	Low/Medium Wage Jobs*	48%	53%	Jobs Held by Workers of Color*	18%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	N/A	N/A	N/A	N/A	<ul style="list-style-type: none"> <li>Owens Sports Complex</li> </ul>
Category	Line 11 (Delta Park portion)	TriMet District																
Low/Medium Wage Jobs*	48%	53%																
Jobs Held by Workers of Color*	18%	13%																
Jobs Held by Hispanic/Latino Workers*	9%	8%																
<b>Rivergate</b>	<ul style="list-style-type: none"> <li>Removes access to an estimated <b>14,295 jobs</b></li> </ul> <table border="1"> <caption>Job Characteristics Comparison (Rivergate)</caption> <thead> <tr> <th>Category</th> <th>Line 11 (Rivergate portion)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>48%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p> <span style="color: red;">■</span> Line 11 (Rivergate portion)                   <span style="color: blue;">■</span> TriMet District             </p>	Category	Line 11 (Rivergate portion)	TriMet District	Low/Medium Wage Jobs*	48%	53%	Jobs Held by Workers of Color*	13%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> <li>Cody Staffing</li> </ul>	N/A	N/A	N/A	N/A
Category	Line 11 (Rivergate portion)	TriMet District																
Low/Medium Wage Jobs*	48%	53%																
Jobs Held by Workers of Color*	13%	13%																
Jobs Held by Hispanic/Latino Workers*	9%	8%																

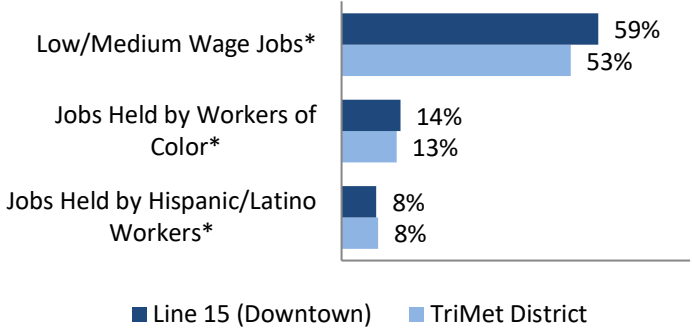
\*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.

**Line 15 – Belmont/NW 23rd**

*New Line and Weekday Frequency and Span Decrease and eliminate Weekend Service*

Creates new access    Improves access    Removes access    Reduces access    Maintains access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
<b>REDUCES ACCESS (Thurman)</b>	<ul style="list-style-type: none"> <li>• <u>Reduces</u> access to an estimated <b>7,559 jobs</b></li> </ul> <table border="1"> <caption>Job Access Comparison (Thurman)</caption> <thead> <tr> <th>Category</th> <th>Line 15 (Downtown)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>59%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p>■ Line 15 (Downtown)   ■ TriMet District</p>	Category	Line 15 (Downtown)	TriMet District	Low/Medium Wage Jobs*	59%	53%	Jobs Held by Workers of Color*	14%	13%	Jobs Held by Hispanic/Latino Workers*	8%	8%	N/A	N/A	<ul style="list-style-type: none"> <li>• Friendly House</li> </ul>	<ul style="list-style-type: none"> <li>• Food Front Cooperative Grocery</li> </ul>	N/A
Category	Line 15 (Downtown)	TriMet District																
Low/Medium Wage Jobs*	59%	53%																
Jobs Held by Workers of Color*	14%	13%																
Jobs Held by Hispanic/Latino Workers*	8%	8%																
<b>MAINTAINS ACCESS (New Line with only Thurman)</b>	<ul style="list-style-type: none"> <li>• <u>Maintains</u> access to an estimated <b>7,559 jobs</b></li> </ul> <table border="1"> <caption>Job Access Comparison (New Line with only Thurman)</caption> <thead> <tr> <th>Category</th> <th>Line 15 (Downtown)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>59%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p>■ Line 15 (Downtown)   ■ TriMet District</p>	Category	Line 15 (Downtown)	TriMet District	Low/Medium Wage Jobs*	59%	53%	Jobs Held by Workers of Color*	14%	13%	Jobs Held by Hispanic/Latino Workers*	8%	8%	N/A	N/A	<ul style="list-style-type: none"> <li>• Friendly House</li> </ul>	<ul style="list-style-type: none"> <li>• Food Front Cooperative Grocery</li> </ul>	N/A
Category	Line 15 (Downtown)	TriMet District																
Low/Medium Wage Jobs*	59%	53%																
Jobs Held by Workers of Color*	14%	13%																
Jobs Held by Hispanic/Latino Workers*	8%	8%																

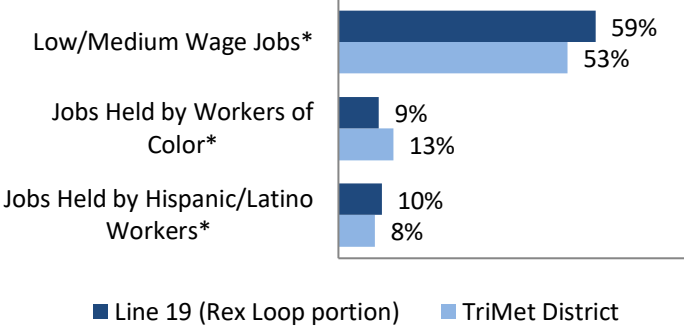
<p><b>NEW ACCESS (Downtown)</b></p>	<ul style="list-style-type: none"> <li>• New access to an estimated <b>8,783 jobs</b></li> </ul>  <table border="1"> <thead> <tr> <th>Category</th> <th>Line 15 (Downtown)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>59%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p>■ Line 15 (Downtown) ■ TriMet District</p>	Category	Line 15 (Downtown)	TriMet District	Low/Medium Wage Jobs*	59%	53%	Jobs Held by Workers of Color*	14%	13%	Jobs Held by Hispanic/Latino Workers*	8%	8%	<p>N/A</p>	<ul style="list-style-type: none"> <li>• Lincoln High School</li> </ul>	<ul style="list-style-type: none"> <li>• Raphael House</li> <li>• The Childrens Institute</li> <li>• Legacy Good Samaritan</li> </ul>	<ul style="list-style-type: none"> <li>• Walgreens (3 locations)</li> <li>• Trader Joes</li> <li>• Lovejoy Market</li> <li>• New Seasons</li> <li>• Zupans Market</li> <li>• Natural Mart</li> <li>• Spring Market</li> </ul>	<ul style="list-style-type: none"> <li>• Hillsboro Volleyball Club</li> </ul>
Category	Line 15 (Downtown)	TriMet District																
Low/Medium Wage Jobs*	59%	53%																
Jobs Held by Workers of Color*	14%	13%																
Jobs Held by Hispanic/Latino Workers*	8%	8%																

\*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.

### Line 19 – Woodstock/Glisan (Rex Loop)

Reduce frequency on weekday and all service on weekends

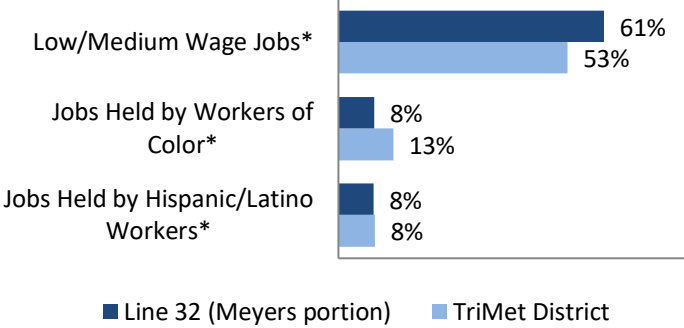
Creates new access    Improves access    Removes access    Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
<p>• <u>Improves</u> access to an estimated <b>161 jobs</b></p>  <table border="1" data-bbox="244 516 927 841"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 19 (Rex Loop portion)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>59%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>9%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>10%</td> <td>8%</td> </tr> </tbody> </table> <p>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</p>	Category	Line 19 (Rex Loop portion)	TriMet District	Low/Medium Wage Jobs*	59%	53%	Jobs Held by Workers of Color*	9%	13%	Jobs Held by Hispanic/Latino Workers*	10%	8%	N/A	N/A	<ul style="list-style-type: none"> <li>Home Care Workers</li> </ul>	N/A	N/A
Category	Line 19 (Rex Loop portion)	TriMet District															
Low/Medium Wage Jobs*	59%	53%															
Jobs Held by Workers of Color*	9%	13%															
Jobs Held by Hispanic/Latino Workers*	10%	8%															

### Line 32 – Oatfield

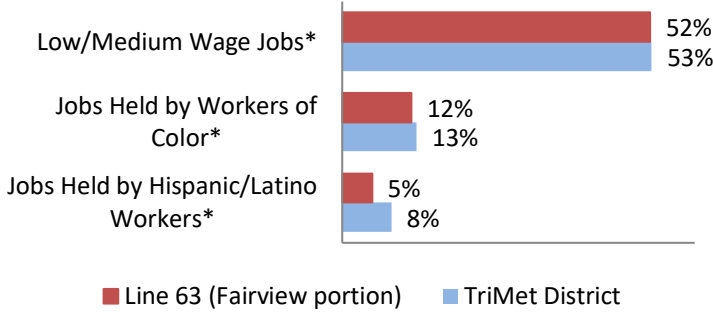
Route change

Creates new access    Improves access    Removes access    Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
<p>• <u>Improves</u> access to an estimated <b>3,253 jobs</b></p>  <table border="1" data-bbox="244 516 927 841"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 32 (Meyers portion)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>61%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>8%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p>■ Line 32 (Meyers portion)   ■ TriMet District</p> <p><i>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</i></p>	Category	Line 32 (Meyers portion)	TriMet District	Low/Medium Wage Jobs*	61%	53%	Jobs Held by Workers of Color*	8%	13%	Jobs Held by Hispanic/Latino Workers*	8%	8%	<ul style="list-style-type: none"> <li>• Rotator Staffing Services</li> <li>• Simplex Solutions</li> </ul>	<ul style="list-style-type: none"> <li>• Oregon City High School</li> </ul>	<ul style="list-style-type: none"> <li>• Home Care Workers</li> </ul>	<p>N/A</p>	<p>N/A</p>
Category	Line 32 (Meyers portion)	TriMet District															
Low/Medium Wage Jobs*	61%	53%															
Jobs Held by Workers of Color*	8%	13%															
Jobs Held by Hispanic/Latino Workers*	8%	8%															

**Line 63 – Washington Park/Arlington Hts**  
 Discontinue service to the Oregon Zoo and Extend Service Downtown

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
<b>NEW ACCESS</b>	<ul style="list-style-type: none"> <li>Improves access to an estimated <b>64,360 jobs</b></li> </ul> <table border="1"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 63 (Downtown)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>37%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>7%</td> <td>8%</td> </tr> </tbody> </table> <p>Legend: ■ Line 63 (Downtown) ■ TriMet District</p>	Category	Line 63 (Downtown)	TriMet District	Low/Medium Wage Jobs*	37%	53%	Jobs Held by Workers of Color*	14%	13%	Jobs Held by Hispanic/Latino Workers*	7%	8%	<ul style="list-style-type: none"> <li>ADA Staffing</li> <li>Northwest Staffing Resources</li> <li>Modis Inc,</li> <li>Hispanic Association</li> <li>CampusPoint</li> <li>Roth Staffing</li> <li>Adecco Medical and Science Staffing</li> <li>Insight</li> <li>Phoenix Staffing</li> <li>Oakridge Staffing</li> <li>Blue Chip Talent</li> </ul>	<ul style="list-style-type: none"> <li>New Avenues for Youth</li> <li>Oregon City High School</li> <li>Portland Community College</li> </ul>	<ul style="list-style-type: none"> <li>National Association for Black Veterans</li> <li>Old Town Clinic</li> <li>Central City Concern</li> <li>Cascade Aids Project</li> <li>Transition Projects</li> <li>BCFS Health and Human Services</li> <li>Big Brothers Big Sisters</li> </ul>	<ul style="list-style-type: none"> <li>Rite Aid</li> <li>Grocery Delivery E-Services</li> <li>Glowing Greens</li> </ul>	N/A
Category	Line 63 (Downtown)	TriMet District																
Low/Medium Wage Jobs*	37%	53%																
Jobs Held by Workers of Color*	14%	13%																
Jobs Held by Hispanic/Latino Workers*	7%	8%																

<p><b>REMOVED ACCESS</b></p>	<ul style="list-style-type: none"> <li>Removes access to an estimated <b>1,225 jobs</b></li> </ul>  <table border="1"> <thead> <tr> <th>Category</th> <th>Line 63 (Fairview portion)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>52%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>5%</td> <td>8%</td> </tr> </tbody> </table> <p>■ Line 63 (Fairview portion) ■ TriMet District</p>	Category	Line 63 (Fairview portion)	TriMet District	Low/Medium Wage Jobs*	52%	53%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	5%	8%	N/A	N/A	N/A	N/A	<ul style="list-style-type: none"> <li>Oregon Zoo</li> <li>Japanese Garden</li> <li>Hoyt Arboretum</li> </ul>
Category	Line 63 (Fairview portion)	TriMet District																
Low/Medium Wage Jobs*	52%	53%																
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\*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.

**Line 93 – Belmont/NW 23rd and Line 94 – Pacific Hwy/Sherwood**

*New Line and Weekday Frequency and Span Decrease and eliminate Weekend Service*

Creates new access    Improves access    Removes access    Reduces access    Maintains access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation
<b>REDUCES ACCESS</b>	<ul style="list-style-type: none"> <li>• <u>Reduces</u> access to an estimated <b>44,222 jobs</b></li> </ul> <p>■ Line 93   ■ TriMet District</p>	<ul style="list-style-type: none"> <li>• Quest Staffing Services</li> <li>• Pacific Labor Supply</li> <li>• Summit Staffing Services</li> <li>• Motivaction Recruiting Corporation</li> <li>• Transforce Inc</li> <li>• Labormax Staffing</li> </ul>	<ul style="list-style-type: none"> <li>• Sherwood Middle School</li> </ul>	<ul style="list-style-type: none"> <li>• Pacific Alcohol &amp; Drug Counseling</li> <li>• Breast Friends</li> <li>• Share and Care House</li> <li>• Helping Hands Home Care</li> <li>• Luke-Dorf Behavioral Health Services</li> <li>• Companion Life Services</li> <li>• McCann’s Medical</li> </ul>	<ul style="list-style-type: none"> <li>• Safeway Stores (2 store locations)</li> <li>• Rite Aid (2 store locations)</li> <li>• Walgreens (3 store locations)</li> <li>• Grocery Outlet of King City</li> <li>• Hi-Mart Portland</li> </ul>	N/A
<b>MAINTAINS ACCESS</b>	<ul style="list-style-type: none"> <li>• <u>Maintains</u> access to an estimated <b>44,222 jobs</b></li> </ul> <p>■ Line 93   ■ TriMet District</p>	<ul style="list-style-type: none"> <li>• Quest Staffing Services</li> <li>• Pacific Labor Supply</li> <li>• Summit Staffing Services</li> <li>• Motivaction Recruiting Corporation</li> <li>• Transforce Inc</li> <li>• Labormax Staffing</li> </ul>	<ul style="list-style-type: none"> <li>• Sherwood Middle School</li> </ul>	<ul style="list-style-type: none"> <li>• Pacific Alcohol &amp; Drug Counseling</li> <li>• Breast Friends</li> <li>• Share and Care House</li> <li>• Helping Hands Home Care</li> <li>• Luke-Dorf Behavioral Health Services</li> <li>• Companion Life Services</li> <li>• McCann’s Medical</li> </ul>	<ul style="list-style-type: none"> <li>• Safeway Stores (2 store locations)</li> <li>• Rite Aid (2 store locations)</li> <li>• Walgreens (3 store locations)</li> <li>• Grocery Outlet of King City</li> <li>• Hi-Mart Portland</li> </ul>	N/A

*\*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not “White Alone”. Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.*





# Overview

- Title VI and service planning
- How TriMet carries out the equity analysis
- Results of the analysis on the service proposal
- Preliminary findings
- Next Steps

# Title VI and Service Planning

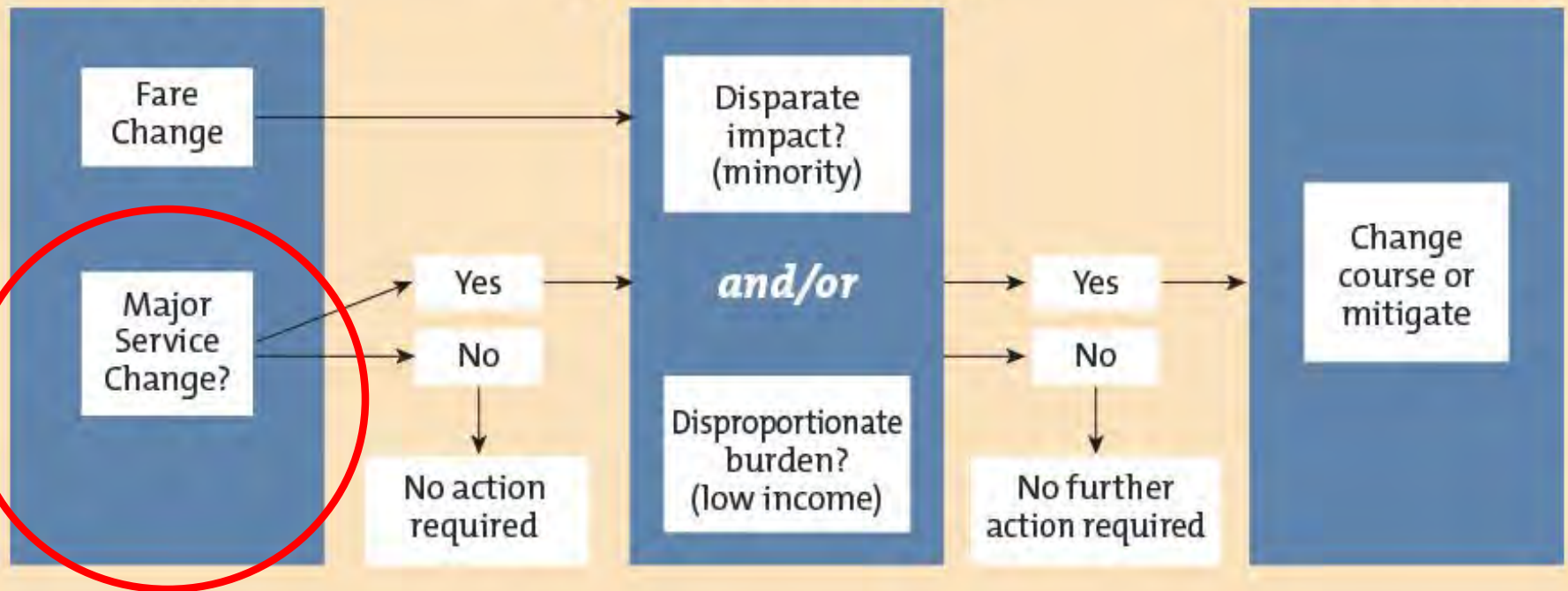


# Overview of TriMet Equity Analysis

## Change?

## Evaluate Possible Impacts

## Evaluate Alternatives



# What qualifies a Major Service Change?

New transit route

Route elimination or retirement

Route split into 2+ transit routes

Changes of 15% or more to:

- route length (miles) \*include re-routes;
- span (hours) of service; or
- frequency (trips per hour)

# Service Plan Proposal Review

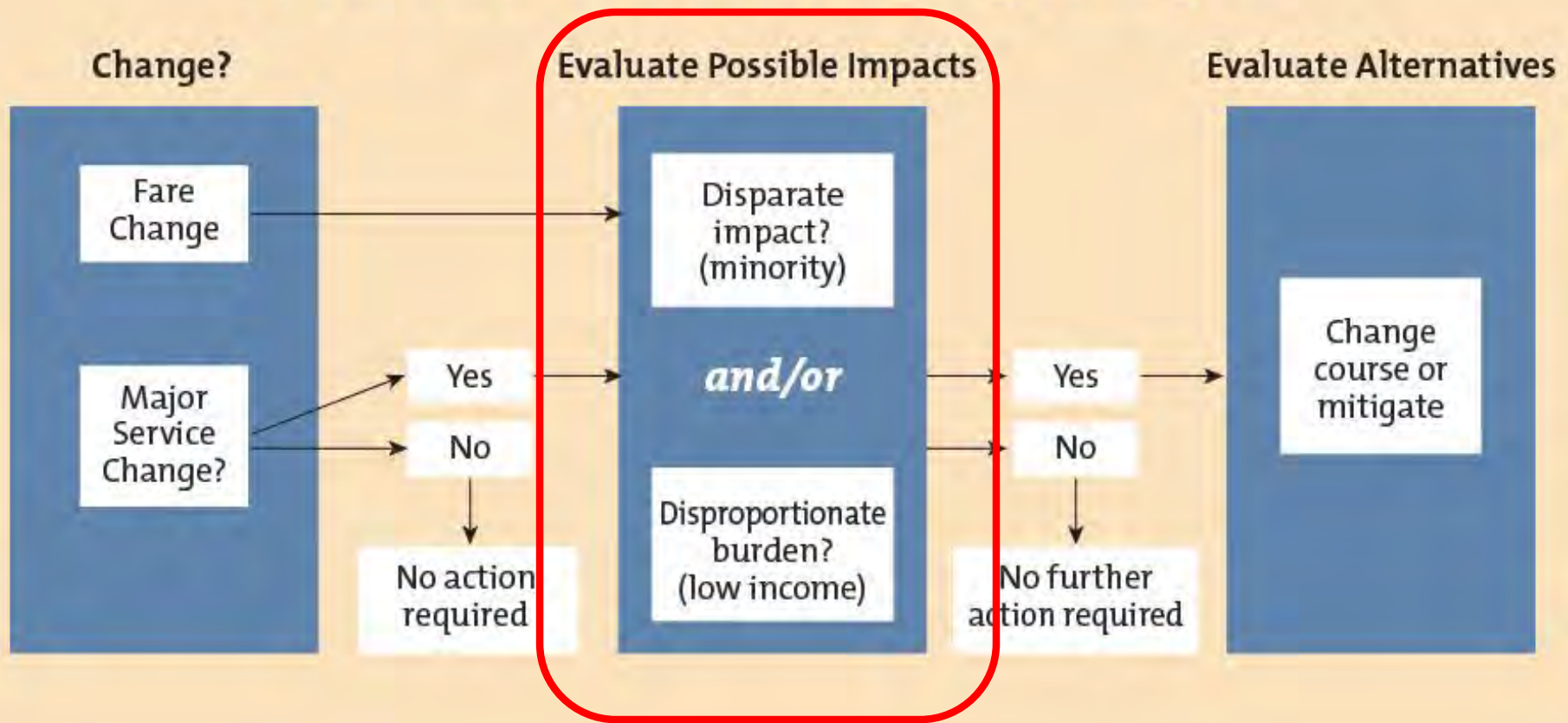
Table 2: Results of Major Service Change Test By Line

Line	Change in Route Length	Change in Span	Change in Frequency	Line Split	Retired Line	New Line or New Service
New Line - FX						✓
Line 2 - Division					✓	
Line 10 - Harold St.	*		+15%			
Line 10 - Harold St. (Saturday)						✓
Line 10 - Harold St. (Sunday)						✓

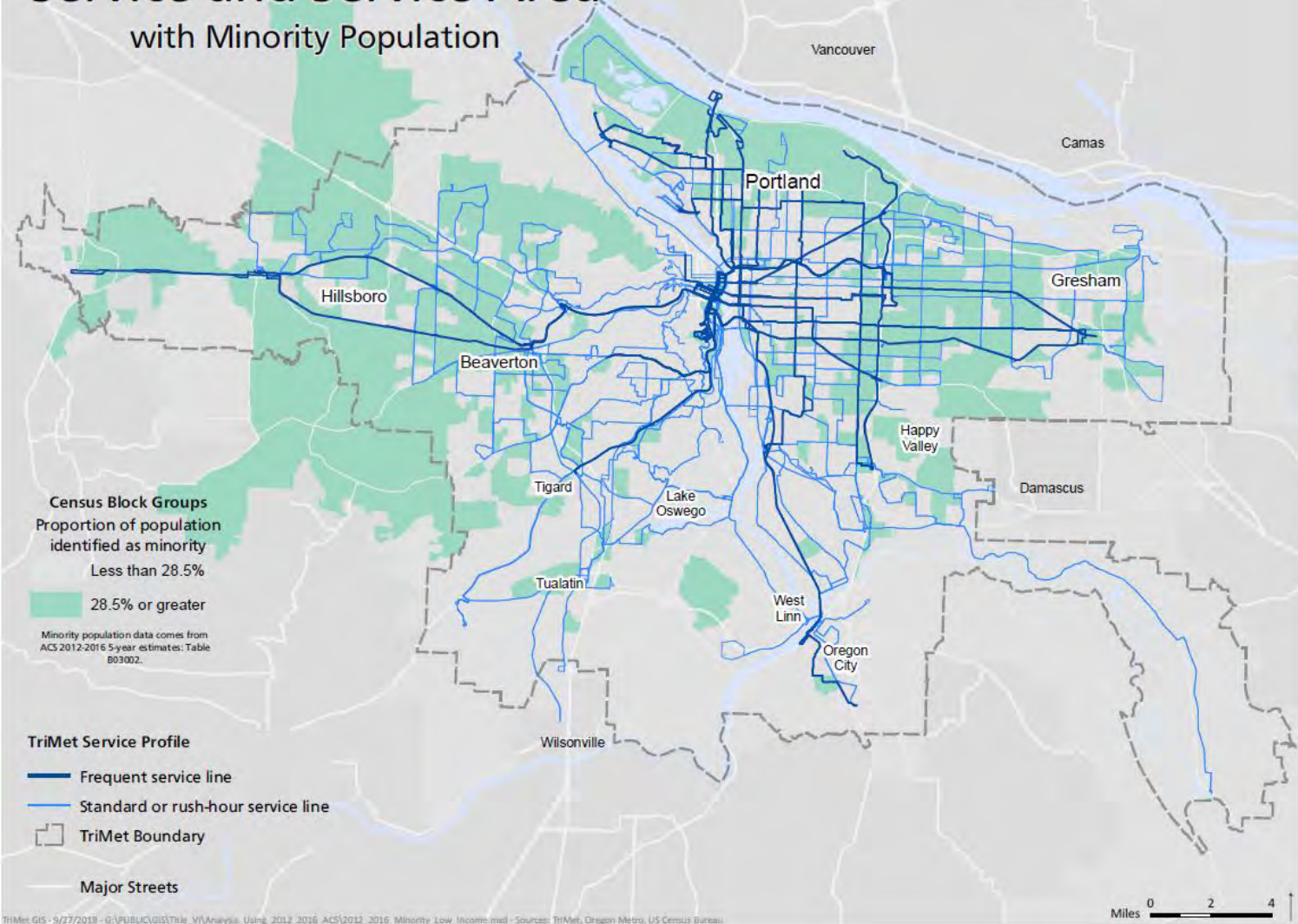
*\*includes routing changes where route miles are neither increased nor reduced (i.e. re-routes)*

Line 80 = No Major Service Change

# Overview of TriMet Equity Analysis



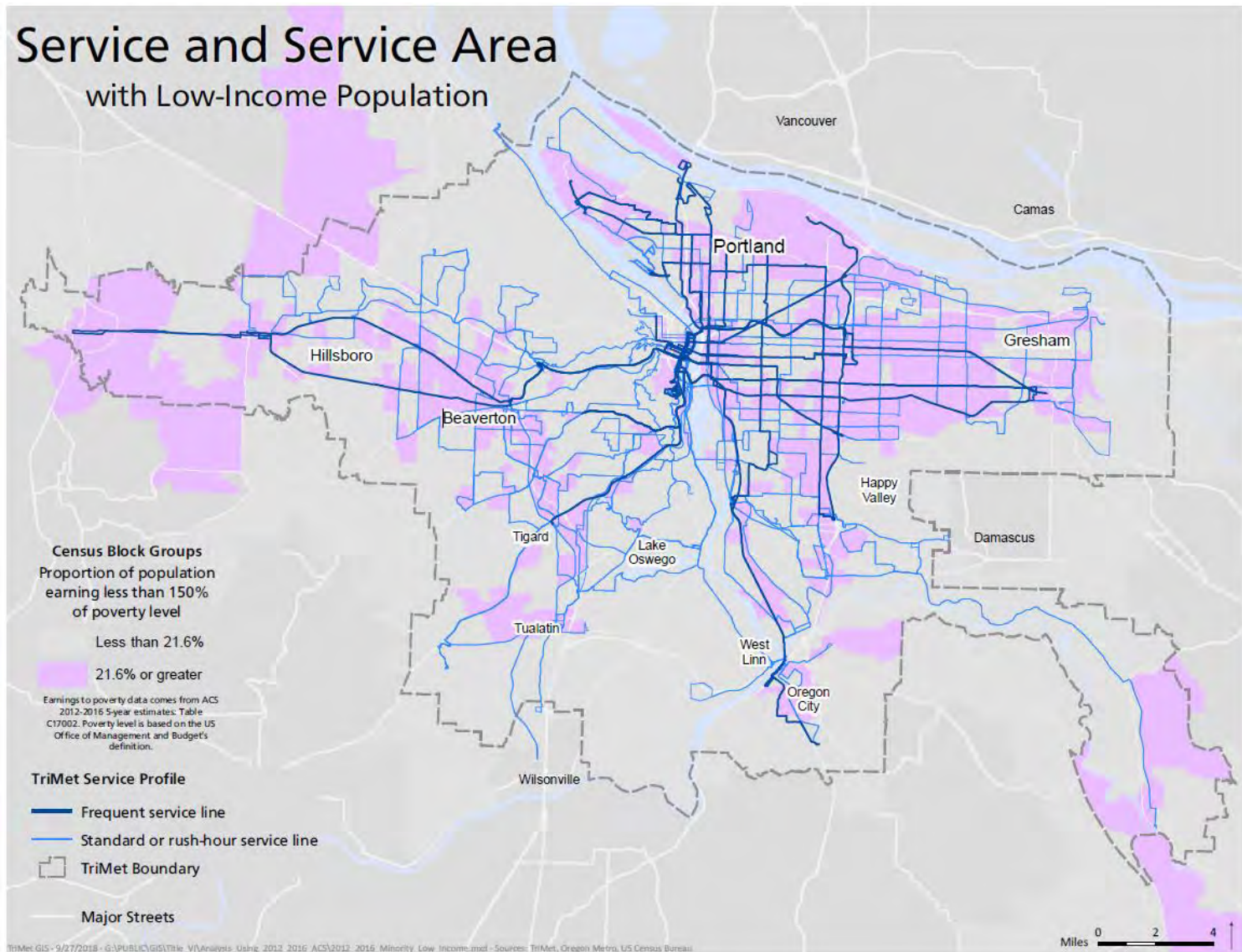
# Service and Service Area with Minority Population



TriMet's Disparate Impact Policy for service increases and decreases



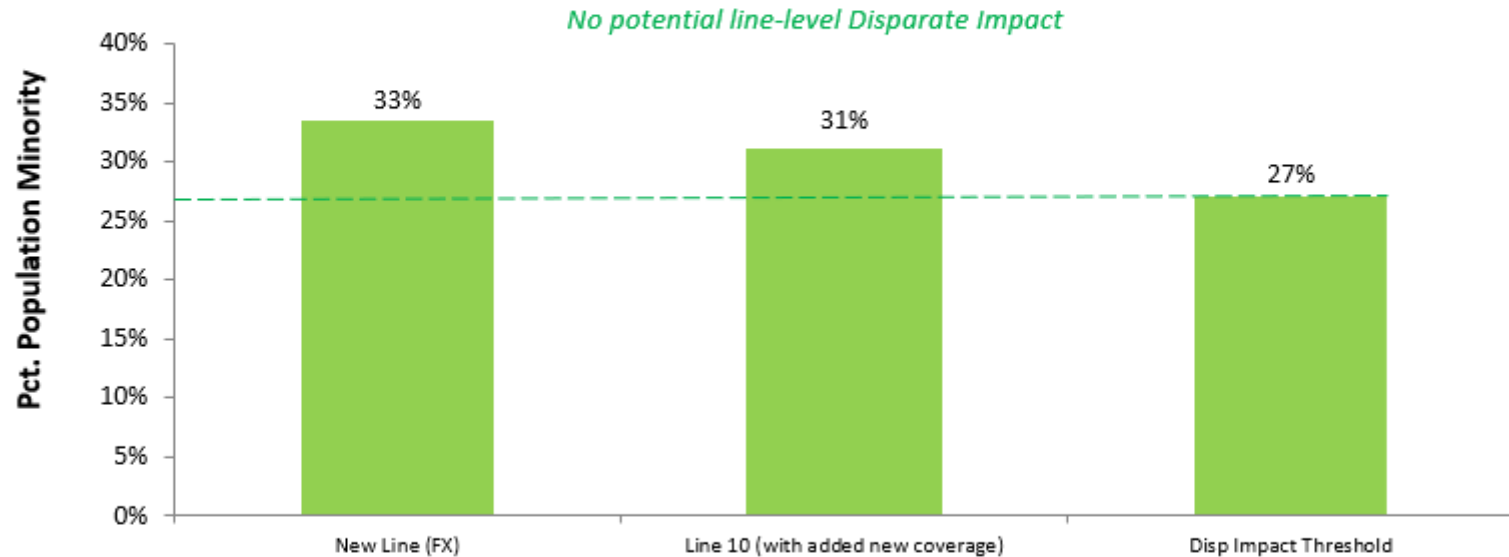
# Service and Service Area with Low-Income Population



TriMet's Disproportionate Burden Policy for service increases and decreases

# Results of 'Line Level' Service Improvements

**Figure 3: Minority Population Comparison**  
Lines with proposed Major Service Increases & Disparate Impact Threshold



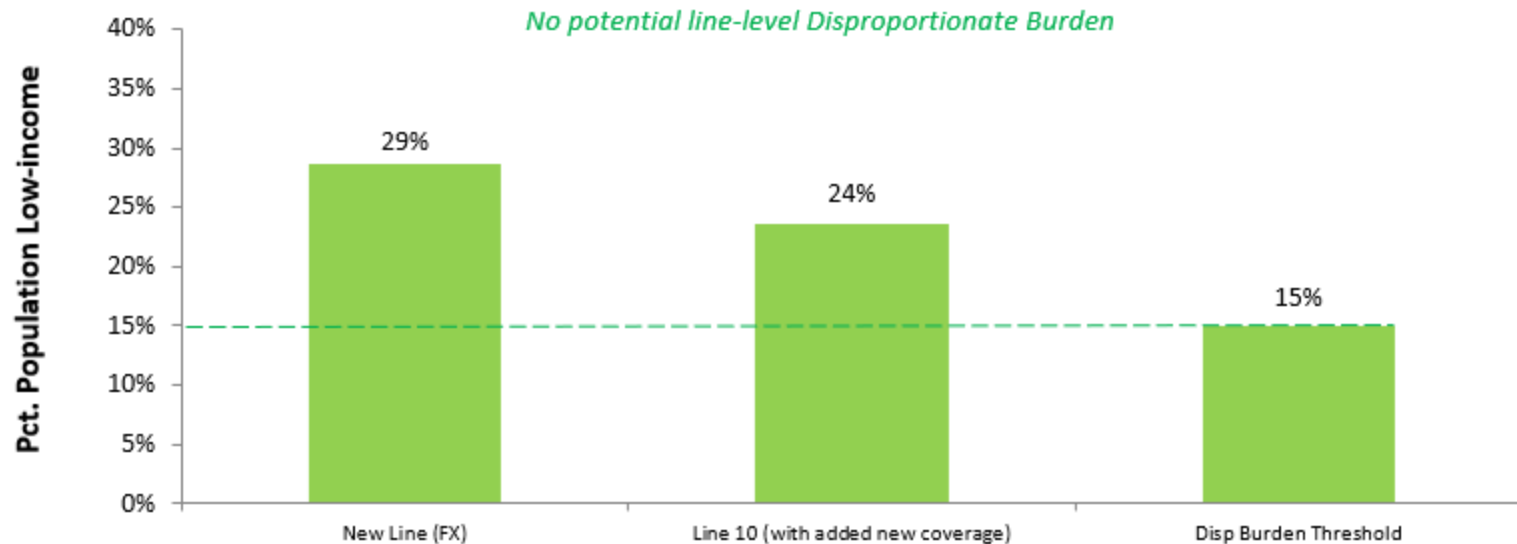
*Source: 2015-2019 American Community Survey, block group level*

**What does “Flagged” mean?** Because these are proposed service increases, protected populations falling below the 27% threshold are flagged. This calls for further examination to include the level of access to jobs, education, and other services are evaluated. System level analysis is also considered

# Results of 'Line Level' Service Improvements

**Figure 4: Low-income Population Comparison**

Lines with proposed Major Service Increases & Disproportionate Burden Threshold

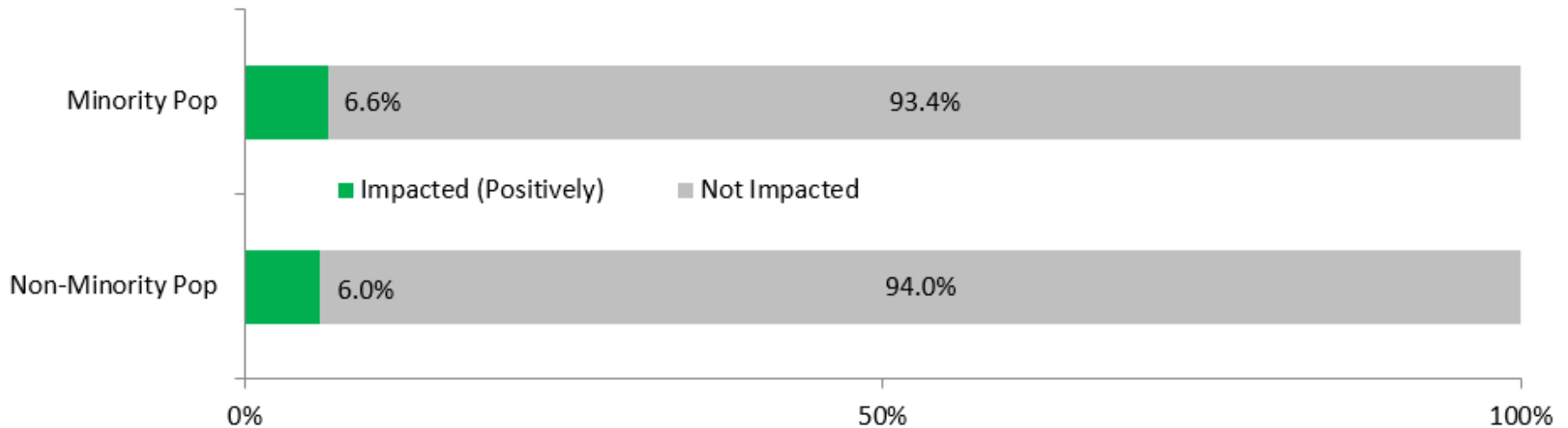


Source: 2015-2019 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

**What does "Flagged" mean?** Because these are proposed service increases, protected populations falling below the 15% threshold are flagged. This calls for further examination to include the level of access to jobs, education, and other services are evaluated. System level analysis is also considered

# Results of 'System Wide' Service Equity Analysis

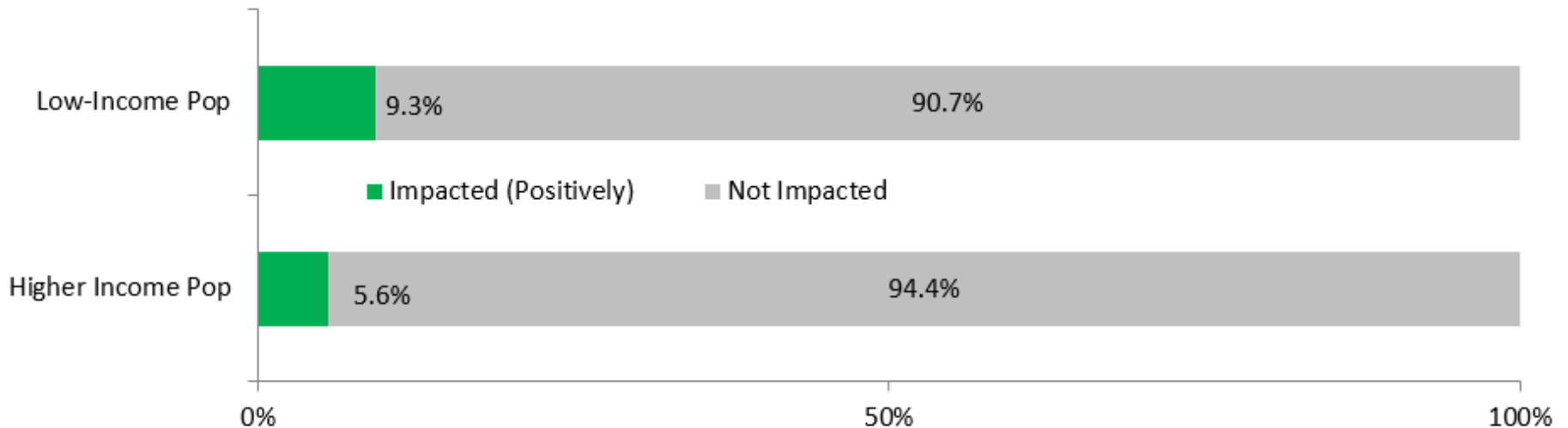
**Figure 5: System-level Impacts of Proposed FY23 Major Service Improvements**  
Minority and Non-minority Populations



Minority population stand to benefit more than the Non-minority population

# Results of 'System Wide' Service Equity Analysis

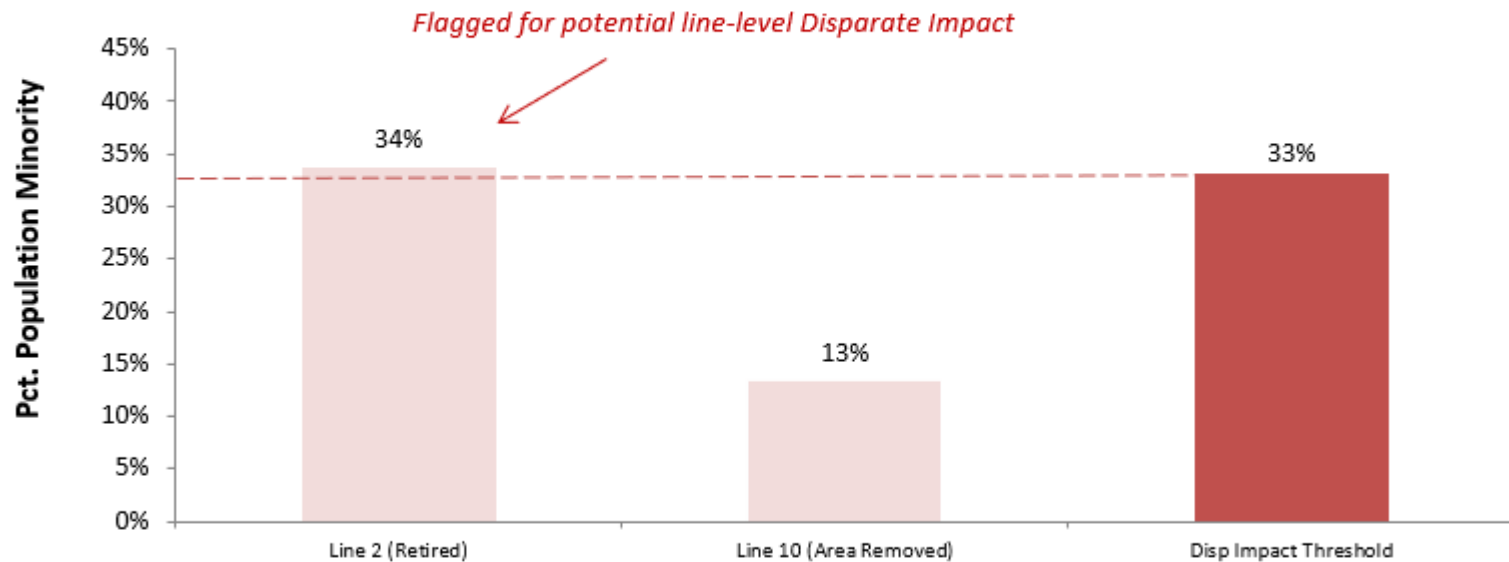
**Figure 6: System-level Impacts of Proposed FY23 Major Service Increases**  
Low-income and Higher Income Populations



Low-income population stand to benefit compared to Higher Income population

# Results of 'Line Level' Service Reductions

**Figure 7: Minority Population Comparison**  
Lines with proposed Major Service Decreases & Disparate Impact Threshold



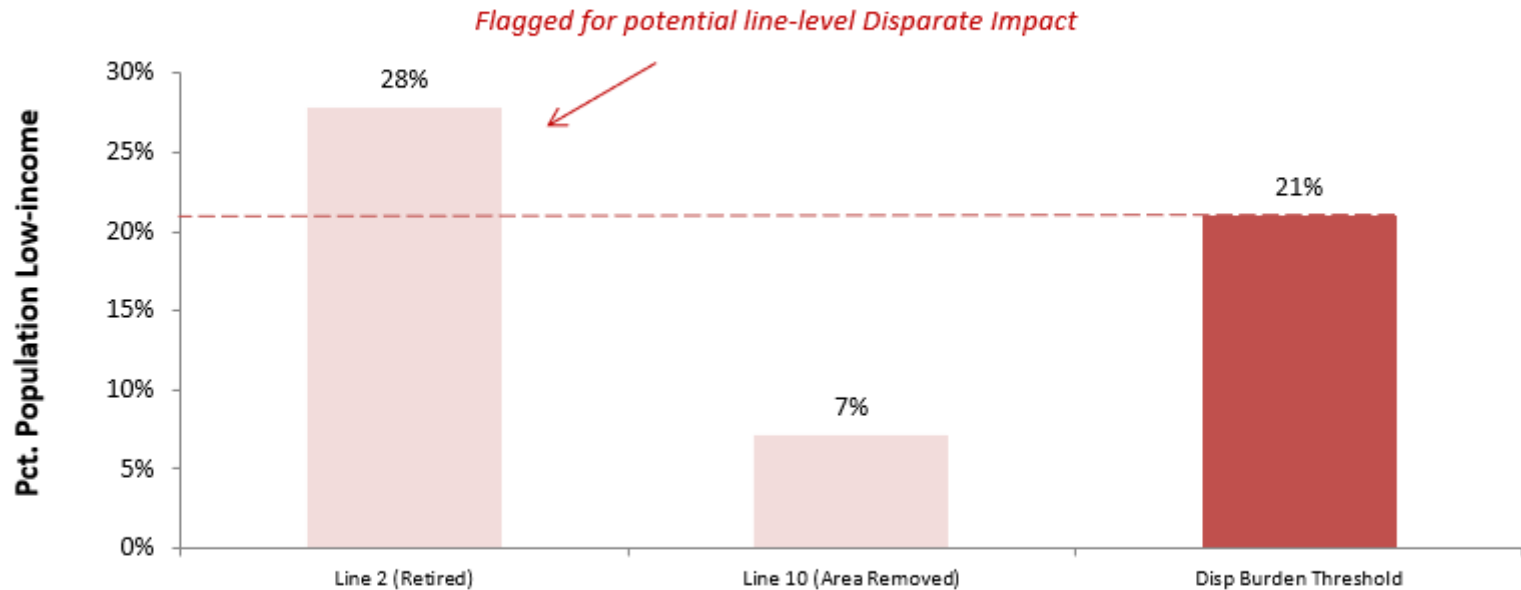
*Source: 2015-2019 American Community Survey, block group level*

**What does “Flagged” mean?** Because these are proposed service decreases, protected populations above the 33% threshold are flagged. This calls for further examination to include the level of access to jobs, education, and other services are evaluated. System level analysis is also considered

# Results of 'Line Level' Service Reductions

**Figure 8: Low-income Population Comparison**

Lines with proposed Major Service Decreases & Disproportionate Burden Threshold

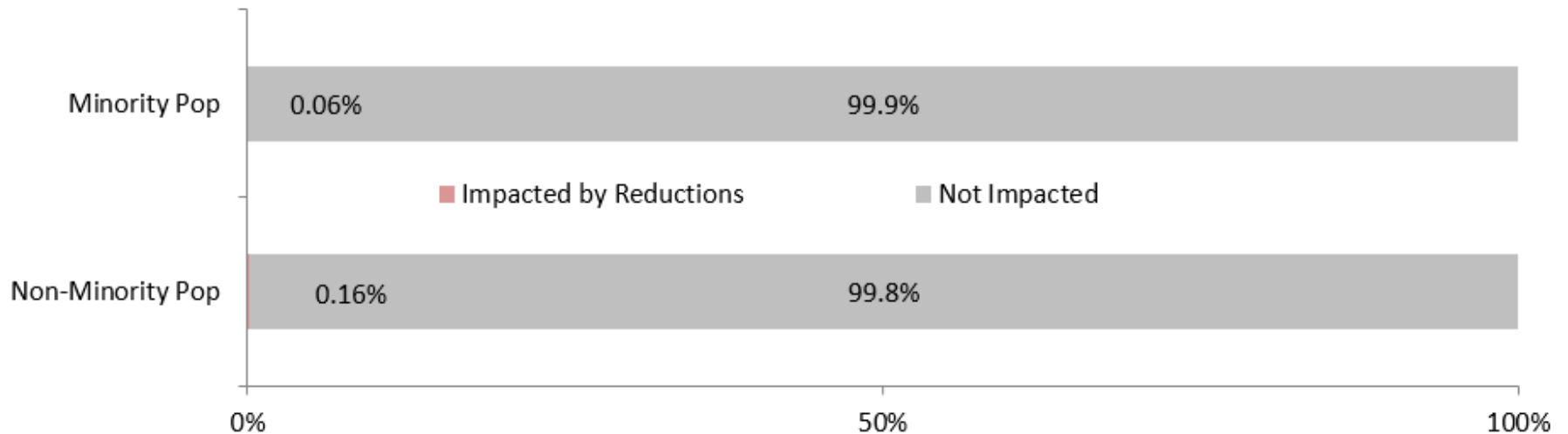


*Source: 2015-2019 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.*

**What does “Flagged” mean?** Because these are proposed service decreases, protected populations above the 21% threshold are flagged. This calls for further examination to include the level of access to jobs, education, and other services are evaluated. System level analysis is also considered

# Results of 'System Wide' Service Equity Analysis

**Figure 9: System-level impacts of proposed FY23 Major Service Reductions**  
Minority and Non-minority Populations

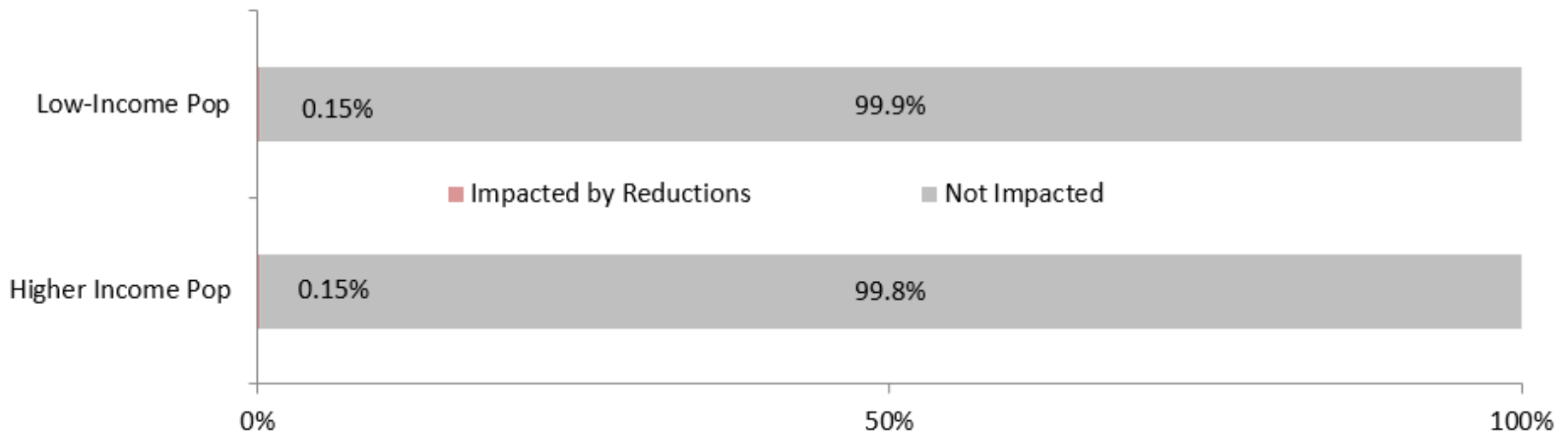


Minority population will receive less of the burden compared to Non-minority population



# Results of 'System Wide' Service Equity Analysis

**Figure 10: System-level impacts of proposed FY23 Major Service Reductions**  
Low-income and Higher Income Populations



Low-income population and Higher Income population will receive an equal share of the burden. Since the percentage of the low-income population does not exceed the disproportionate burden threshold (0.18%) this does not result in a system-wide finding.

# Next Steps

## **November-December**

- Review preliminary Title VI analysis

## **December – January**

- TEAC Presentation

## **January – February**

- Title VI Service Equity Report posted for public comment

## **Spring 2023**

- Finalize Proposal
  
- Finalize Title VI analysis report

# Title VI Service Monitoring Guidebook

*In accordance with FTA Circular 4702.1B and TriMet's 2019 Title VI Program*

## Table of Contents

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<b>Type chapter title (level 1)</b> .....	<b>4</b>
Type chapter title (level 2) .....	5
Type chapter title (level 3) .....	6

## I. FTA Title VI Guidelines

In compliance with FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients (Title VI Circular), transit agencies that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more are required to monitor the performance of their transit system relative to the system-wide service standards and policies at least once every three years. These periodic monitoring activities shall compare the level of service provided to predominately minority or low-income areas with the level of service provided to predominately non-minority or higher income areas to ensure the end result of policies and decision-making is equitable.

Title VI guidelines requires transit agencies adopt quantitative system-wide service standards necessary to guard against discriminatory service design or operations decisions. Guidelines require recipients to develop quantitative standards for vehicle loads, service frequency/headways, on-time performance, service availability, distribution of transit amenities and vehicle assignments.

## II. TriMet Service Monitoring Overview

Although the Title VI Circular only requires that transit agencies monitor service once every three years, TriMet has adopted an annual review process as part of their Strategic Business Plan efforts. Part of TriMet's compliance with the Title VI Circular is ongoing performance monitoring across all service modes (bus, MAX, and WES). The Title VI Circular does not require monitoring for demand response service. The objective is to ensure there is an equitable distribution across TriMet's system.

## III. Service Performance Standards and Policies

TriMet has adopted standards and policies for service, including design, operation and provision of facilities and other amenities. These policies and standards guide TriMet in providing transit service that is safe, dependable, responsive, easy, and welcoming for all riders. They provide a basis for quantitative "yardsticks" to ensure that service design and operations practices do not result in discrimination on the basis of race, color or national origin or a disproportionate burden on low-income populations.

Standards: Service frequency, Service availability, Vehicle loads, On-time performance,

**Service frequency and span (revenue hours):** TriMet evaluates the amount and distribution of revenue hours of service provided. The hours while in service include trip start to finish.

**Service availability:** TriMet considers persons residing within one-half mile of bus stops and/or rail stations as having service available. Service availability is expressed as number and percentage of District-wide population and is determined by vehicle mode.

**Vehicle loads:** TriMet evaluates whether fixed-route buses or light rail vehicles are overcrowded by comparing the load/seat ratio to the maximum load factor for each vehicle type: bus (1.3), MAX (2.1), and WES (1.0). Observed loads are compared with the number of

seats and the size of the vehicle to determine situations where the load exceeded the standard. The loading information will be provided by route electronically. Routes defined as minority/non-minority or low-income/higher income shall be compared to see if a statistical relationship exists between the distribution of overloads and the type of vehicle.

**On-time performance:** TriMet defines “on-time” as no more than five minutes late or one minute early. Measured at timepoints. TriMet’s automatic vehicle location (AVL) system logs the location and on-time performance for every vehicle as it crosses each scheduled timepoint. The on-time percentage by timepoint for a representative quarterly signup (e.g., Spring 2020) is used to evaluate on-time performance for Weekday, Saturday and Sunday.

Policies: Distribution of Amenities and Vehicle assignment

**Stop amenities:** TriMet analyzes the distribution of stop amenities in the TriMet system (shelters, seating, lighting, waste receptacles, etc.) in order to identify any potential disparities.

**Vehicle assignment:** TriMet assesses the vehicle assignment practices for fixed-route buses and light rail vehicles. The expectation is that the average age of vehicles on minority and/or low-income lines should be no more than the average age of vehicles on non-minority and/or higher income lines.

#### IV. Performance Measure Rating Scale Rubric

The Title VI rating scale rubric ranges from “outstanding”, “good”, “fair”, “marginal” to “adverse impact”. To receive an “outstanding” score, access, or service distribution for minority and low-income must be as good or better than non-minority and higher income for each measure. A performance finding within the 5% threshold is considered “good”. The target for TriMet’s Business Plan objective is within 5% or better. A greater than 5% but less than 10% difference equates to “fair”. Above the 10% threshold but within 20% would result in a “marginal” score. A marginal score would be flagged as a caution and area for improvement. Any measure that exceeds 20% would indicate “adverse impact” and would result in a system-wide disparate impact/disproportionate burden finding per the Federal Transit Administration. TriMet will work to improve service and access on an on-going basis to ensure TriMet’s equity targets are achieved and for compliance with TriMet’s board adopted Title VI Program.

#### V. Service Performance Monitoring Process

The process of conducting a Title VI service monitoring report contains several components and should be a collaborative effort by staff from multiple departments. The following provides a summary of the steps and actions TriMet takes when performing the analysis, from data collection through action by the TriMet Board to approve of the report in tandem with the Title VI Program Update.

## A. Key Dates

SEP	OCT	NOV	DEC	JAN	FEB
Send email to Coordinating Staff request for data	Receive data from all Coordinating Staff	Data cleaning and analysis  Present initial findings to Title VI Committee	Draft Report and Memo  Send draft report to internal stakeholders for review  Present to Transit Equity Advisory Committee	Finalize Report and Memo  Business Plan presented to TriMet Board of Directors	Post final report to TriMet Equity Analysis and Service Monitoring website

## B. Components

### 1. Data requirements

To compute minority and low-income routes (Title VI routes) and non-minority and higher income routes (non-Title VI routes), TriMet relies on data from the US Census Bureau American Community Survey (ACS) 5-Year Estimates Table (C17002 and B03002) and Revenue Hours from all modes (bus, MAX, & WES) for the review period (e.g., Spring 2021).

To compare distribution for the six measures across minority/non-minority and low-income/higher income routes, TriMet relies on data from the revenue hours report, quarterly route performance reports, average vehicle age by all modes report, and Stops and Amenities (SAMs) report.

#### *Coordinating Staff*

- Transit Equity, Inclusion, and Community Affairs department
  - Administrator or Analyst
- Service Performance and Analysis department
  - Miles Crumley and Nathan Banks
- GIS Analysts
  - Erin Hamilton and George Roth
- Bus Stop Planner/Analyst
  - Myleen Richardson

### 2. Analyze and display data, determine findings

Title VI Program Administrator with support from Coordinating Staff runs appropriate analysis of the data to identify any potential disparate impacts or disproportionate burdens that may result. The first step is to perform a spatial analysis in ArcGIS to identify minority and low-income routes utilizing revenue hours (and X and Y coordinates) provided by the Service Performance and Analysis department and Census demographic data. Minority routes are defined as routes that have at least 1/3 of its total revenue hours in a census block with a

percentage of minority population greater than the percentage of minority population in the transit service area. Based on 2014-2018 ACS, the minority population is 29.8% for the TriMet service district (Figure 1). Low-income routes are defined as routes that have at least 1/2 of its total revenue hours in a census block with a percentage of low-income population greater than the percentage of low-income population in the transit service area. Based on 2014-2018 ACS, the low-income population is 19.4% for the TriMet service district.

Figure 1: Minority and Non-Minority Lines

Minority Lines	Non-Minority Lines
10-Harold St	1-Vermont
11-Rivergate/Marine Dr	12-Barbur/Sandy Blvd
14-Hawthorne	152-Milwaukie
155-Sunnyside	154-Willamette/Clackamas Heights
156-Mather Rd	15-Belmont/NW 23rd
19-Woodstock/Glisan	16-Front Ave/St Helens Rd
20-Burnside/Stark	17-Holgate/Broadway
21-Sandy Blvd/223rd	18-Hillside
22-Parkrose	24-Fremont/NW 18th
23-San Rafael	291-Orange Night Bus
25-Glisan/Rockwood	297-NW Yeon/OBRC
2-Division	29-Lake/Webster Rd
30-Estacada	32-Oatfield
31-Webster Rd	33-McLoughlin/King Rd
46-North Hillsboro	34-Linwood/River Rd
47-Main/Evergreen	35-Macadam/Greeley
48-Cornell	36-South Shore
4-Fessenden	37-Lake Grove
52-Farmington/185th	38-Boones Ferry Rd
53-Arctic/Allen	39-Lewis & Clark
57-TV Hwy/Forest Grove	43-Taylor's Ferry Rd
59-Walker/Park Way	44-Capitol Hwy/Mocks Crest
62-Murray Blvd	45-Garden Home
67-Bethany/158th	50-Cedar Mill
6-Martin Luther King Jr Blvd	51-Vista
71-60th Ave	54-Beaverton-Hillsdale Hwy
72-Killingsworth/82nd Ave	55-Hamilton
73-122nd Ave	56-Scholls Ferry Rd
74-162nd Ave	58-Canyon Rd
76-Hall/Greenburg	61-Marquam Hill/Beaverton
79-Clackamas/Oregon City	63-Washington Park/Arlington Hts
80-Kane/Troutdale Rd	64-Marquam Hill/Tigard
81-Kane/257th	65-Marquam Hill/Barbur Blvd
82-South Gresham	66-Marquam Hill/Hollywood
84-Powell Valley/Orient Dr	68-Marquam Hill/Collins Cirde
87-Airport Way/181st	70-12th/NE 33rd Ave
88-Hart/198th	75-Cesar Chavez/Lombard
96-Tualatin/I-5	77-Broadway/Halsey
97-Tualatin-Sherwood Rd	78-Denney/Kerr Pkwy
9-Powell Blvd	85-Swan Island
MAX Blue Line	8-Jackson Park/NE 15th
MAX Green Line	92-South Beaverton Express
MAX Red Line	93-Tigard/Sherwood
WES Commuter Rail	94-Pacific Hwy/Sherwood
	99-Macadam/McLoughlin
	MAX Orange Line
	MAX Yellow Line



Figure 2: Low-Income and Higher Income Lines (Spring 2020)

Low Income Lines	Higher Income Lines
10-Harold St	11-Rivergate/Marine Dr
12-Barbur/Sandy Blvd	152-Milwaukie
14-Hawthorne	154-Willamette/Clackamas Heights
15-Belmont/NW 23rd	155-Sunnyside
17-Holgate/Broadway	156-Mather Rd
19-Woodstock/Glisan	16-Front Ave/St. Helens Rd
20-Burnside/Stark	18-Hillside
21-Sandy Blvd/223rd	1-Vermont
23-San Rafael	22-Parkrose
25-Glisan/Rockwood	24-Fremont/NW 18th
291-Orange Night Bus	29-Lake/Webster Rd
297-NW Yeon/OBRC	31-Webster Rd
2-Division	35-Macadam/Greeley
30-Estacada	36-South Shore
32-Oatfield	37-Lake Grove
33-McLoughlin/King Rd	38-Boones Ferry Rd
34-Linwood/River Rd	39-Lewis & Clark
44-Capitol Hwy/Mocks Crest	43-Taylor's Ferry Rd
4-Fessenden	45-Garden Home
52-Farmington/185th	46-North Hillsboro
53-Arctic/Nlen	47-Main/Evergreen
56-Scholls Ferry Rd	48-Cornell
57-TV Hwy/Forest Grove	50-Cedar Mill
61-Marquam Hill/Beaverton	51-Vista
64-Marquam Hill/Tigard	54-Beaverton-Hillsdale Hwy
68-Marquam Hill/Collins Circle	55-Hamilton
6-Martin Luther King Jr Blvd	58-Canyon Rd
70-12th/NE 33rd Ave	59-Walker/Park Way
72-Killingsworth/82nd Ave	62-Murray Blvd
73-122nd Ave	63-Washington Park/Arlington Hts
74-162nd Ave	65-Marquam Hill/Barbur Blvd
76-Hall/Greenburg	66-Marquam Hill/Hollywood
77-Broadway/Halsey	67-Bethany/158th
78-Denney/Kerr Pkwy	71-60th Ave
79-Clackamas/Oregon City	75-Cesar Chavez/Lombard
80-Kane/Trousdale Rd	84-Powell Valley/Orient Dr
81-Kane/257th	85-Swan Island
82-South Gresham	92-South Beaverton Express
87-Airport Way/181st	96-Tualatin/I-5
88-Hart/198th	99-Macadam/McLoughlin
8-Jackson Park/NE 15th	
93-Tigard/Sherwood	
94-Pacific Hwy/Sherwood	
97-Tualatin-Sherwood Rd	
9-Powell Blvd	
MAX Blue Line	
MAX Green Line	
MAX Orange Line	
MAX Red Line	
MAX Yellow Line	
WES Commuter Rail	

The second step is to set up the Service Monitoring Workbook for data cleaning and to run the calculations needed to draw the comparisons and to develop the final results tables (Appendix A).

To determine service availability between Title VI populations and non-Title VI populations, GIS is used to buffer bus stop and MAX/WES station locations using a half-mile service area. The

buffer areas are used to determine which census blocks are served by each bus stop and MAX/WES station locations. GIS Analysts produce the Service Availability Table (Figure 3).

Figure 3: Service Availability

Demographic Analysis of Proximity to TriMet Service (Percent)		TM District		Percent within 1/2* Mile of...			Frequent Service	
		Totals (Raw Num)	Totals (Pct.)	Bus	MAX	WES	Bus	Bus & MAX
<b>Population</b>	Total (ACS 5 year estimate, 2014-2018)	1,614,972	100.0%	88.2%	16.5%	0.9%	43.7%	60.2%
<b>Minority</b>	All Minorities**	481,205	29.8%	90.2%	20.9%	1.3%	46.2%	67.1%
<b>Non-Minority</b>	White (Non-Hispanic)	1,133,765	70.2%	87.3%	14.7%	0.7%	42.6%	57.3%
<b>Population</b>	Total population with known income (ACS 5 year estimate, 2014-2018)***	1,592,945	100.0%	88.1%	16.4%	0.9%	43.4%	59.9%
<b>Income</b>	Below 150% of Poverty Level	309,065	19.4%	93.8%	24.6%	1.5%	55.5%	80.0%
<b>Income</b>	Above 150% of Poverty Level	1,283,880	80.6%	86.8%	14.5%	0.7%	40.6%	55.0%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2014 - 2018 (5-Year Estimates), Table B03002. Hispanic or Latino Origin By Race, and Table C17002. Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data)

To determine vehicle loads between Title VI routes and non-Title VI routes, the Time of Day Ridership report is used to assess the average load/seat ratio for each time period (AM Peak, Midday, and PM Peak) across all modes. The average load/seat ratio for minority routes and non-minority routes (Figure 4) as well as low-income routes and higher income routes (Figure 5) are compared to the maximum load factor for each vehicle type: bus (1.3), MAX (2.1), and WES (1.0).

Figure 4: Vehicle Loads – Minority and Non-Minority Lines

Vehicle Type	Time Period	Minority Lines		Non-Minority Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.12	4.72	0.10	4.55
	Midday	0.15	5.61	0.12	4.83
	PM Peak	0.16	5.92	0.12	5.30
MAX Light Rail (128 seats)	AM Peak	0.16	22.21	0.16	19.43
	Midday	0.24	30.17	0.18	23.50
	PM Peak	0.28	35.00	0.19	24.75
WES Commuter Rail (146 seats)	AM Peak	0.13	9.80	n/a	n/a
	PM Peak	0.03	12.50	n/a	n/a

Figure 5: Vehicle Loads – Low-income and Higher Income Lines

Vehicle Type	Time Period	Low-Income Lines		Higher Income Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.15	5.72	0.09	3.74
	Midday	0.17	6.45	0.10	3.94
	PM Peak	0.19	7.17	0.19	4.27
MAX Light Rail (128 seats)	AM Peak	0.16	21.10	n/a	n/a
	Midday	0.21	27.50	n/a	n/a
	PM Peak	0.24	30.90	n/a	n/a
WES Commuter Rail (146 seats)	AM Peak	0.13	9.80	n/a	n/a
	PM Peak	0.03	12.50	n/a	n/a

To determine on-time performance between Title VI routes and non-Title VI routes, the On-time Performance (OTP) report is used to assess each routes OTP percentage across all modes and for each day period (Weekday, Saturday, and Sunday). The average OTP percentage for minority routes are compared to non-minority routes for each mode (Figure 6). A similar comparison is made for low-income routes and higher income routes (Figure 7).

Figure 6: On-Time Performance – Minority and Non-Minority Lines

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Minority to Non-Minority +/-
		Minority Lines	Non-Minority Lines	
Bus	Weekday	94%	95%	(1)
	Saturday	95%	95%	0
	Sunday	95%	95%	0
MAX Light Rail	Weekday	92%	93%	(1)
	Saturday	92%	89%	3
	Sunday	94%	92%	2
WES Commuter Rail	Weekday	99%	n/a	n/a

Figure 7: On-Time Performance – Low-income and Higher Income Lines

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Low Income to Higher Income +/-
		Low Income Lines	Higher Income Lines	
Bus	Weekday	95%	94%	1
	Saturday	96%	94%	2
	Sunday	95%	95%	0
MAX Light Rail	Weekday	92%	n/a	n/a
	Saturday	90%	n/a	n/a
	Sunday	93%	n/a	n/a
WES Commuter Rail	Weekday	99%	n/a	n/a

To determine the distribution of amenities between Title VI stops and non-Title VI stops, the SAMs report (i.e., list of each stop with amenities), provided by the Bus Stop Planner/Analyst, will need to be modified to ensure each stop is coded as minority, non-minority, low-income, and higher income. The ArcGIS geoprocessing tools used to determine Title VI and non-Title VI routes shall be utilized for coding each stop. Once the data is cleaned, the percentage of Minority stops and Non-Minority stops (Figure 8) as well as Low-income and Higher Income stops (Figure 9). can be compared for each amenity.

Figure 8: Stops Amenities – Minority and Non-Minority Lines

Category of Amenity	Pct. of Stops on Minority Lines	Pct. of Stops on Non-Minority Lines
Seating	39%	33%
Lighting	61%	65%
Elevators	<1%	<1%
Digital Displays	3%	4%
Shelters	20%	18%
Signs, Maps and/or Schedules	97%	98%
Waste Receptacles	15%	14%

Figure 9: Stops Amenities – Low-income and Higher Income Lines

Category of Amenity	Pct. of Stops on Low-Income Lines	Pct. of Stops on Higher Income Lines
Seating	43%	29%
Lighting	66%	61%
Elevators	<1%	<1%
Digital Displays	6%	1%
Shelters	25%	13%
Signs, Maps and/or Schedules	96%	99%
Waste Receptacles	19%	10%

To determine the average vehicle age between Title VI routes and non-Title VI routes, the Vehicle Age by Route report (Bus and MAX), provided by the Service Performance and Analysis team, will be utilized. To calculate, the average age of each route will be inserted next to the routes coded as Minority/Non-Minority and Low-income/Higher Income in the Service Monitoring Workbook. Subsequently, the sum of all averages can then be compared for minority routes and non-minority routes for each mode (Figure 10). A similar comparison is made for low-income routes and higher income routes (Figure 11).

Figure 10: Vehicle Assignment – Minority and Non-Minority Lines

Mode of Service	Avg. Age of Vehicles (Years)		Difference; Minority to Non-Minority +/-
	Minority Lines	Non-Minority Lines	
Bus	6.6	6.7	1.34
MAX Light Rail	17.6	19.1	1.50
WES Commuter Rail	Primary: 14.0 Spares: 68.5	n/a	n/a

Figure 11: Vehicle Assignment – Low-income and Higher Income Lines

Mode of Service	Avg. Age of Vehicles (Years)		Difference; Low Income to Higher Income +/-
	Low Income Lines	Higher Income Lines	
Bus	4.7	5.2	.53
MAX Light Rail	18.2	n/a	n/a
WES Commuter Rail	Primary: 14.0 Spares: 68.5	n/a	n/a

For a detailed step-by-step process refer to Appendix B. This desk guide can be utilized to better understand the behind the efforts with running the calculations, using the geoprocessing tools in ArcGIS, where to download the various quarterly performance reports, and lessons learned in production of the Service Monitoring Report.

## VI. Service Performance Monitoring Report

Transit Equity, Inclusion, and Community Affairs documents the analysis and findings with accompanying tables and charts as illustrated in the FTA Title VI Circular and specifically the Equity Analysis and Service Monitoring website<sup>1</sup>. The draft report and memo will be provided to the Business Planning and Assessment Management (BPAM) and the Title VI Committee for review. Once feedback is received and revisions are made, The Title VI Administrator or Analyst will finalize the report, submit report back to BPAM, and then present the report to the Transit Equity Advisory Committee

TriMet prioritizes the equitable distribution of services and shall prioritize efforts to address any adverse impacts to reach equity targets on an annual basis. The objective is to be aware of possible equity impacts early and thereby avoid or minimize adverse effects in service distribution across TriMet's system. To achieve "On Target" results, the Title VI Administrator or Analyst will coordinate with Bus Maintenance for vehicle assignments, Service Planners and Service Scheduling for on-time performance, revenue hours, service frequency, service availability, and vehicle loads, and Service Planners and Bus Stop Planner/Analyst for stops amenities. The Title VI Administrator or Analyst will also coordinate with BPAM, Service Performance and Analysis department, the Title VI Committee, and TEAC in adding measures or the refinement of the six service performance metrics.

### *Coordinating Staff*

- Transit Equity, Inclusion, and Community Affairs department
  - Administrator or Analyst
- Business Planning and Asset Management department
  - Alan Lehto and John Kitchens
- Service Performance and Analysis department
  - Miles Crumley and Nathan Banks
- GIS Analysts
  - Erin Hamilton and George Roth
- Bus Stop Planner/Analyst
  - Myleen Richardson
- Title VI Committee
  - John Gardner, Shelley Devine, Dee Brookshire, JC Vanatta, Martin Gonzalez, Ginger Shank, Erik Van Hagen, Rhyan Schaub, Jamie Surface, Madeline Steele

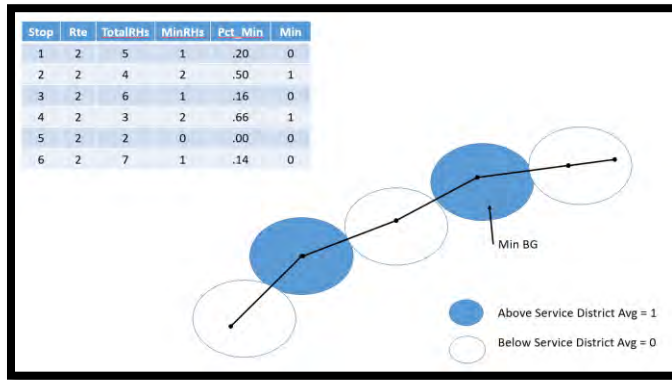
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<sup>1</sup> <https://trimet.org/equity/analysis.htm>



# Appendix B: Service Monitoring Performance Metrics Desk Guide

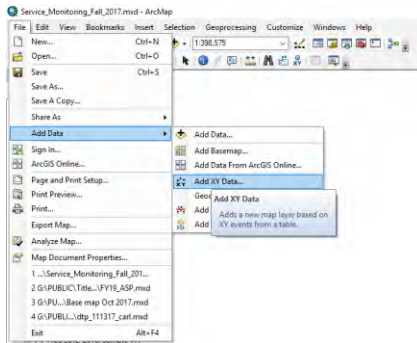
Determine “Minority – Non-minority” and “Low-income – Higher income” lines



Step 1: Request Revenue Hours by Stop and X\_Y Coordinates from Service Performance & Analysis

	A	B	C	D	E
1	PUBLIC_ROUTE_DESCRIPTION	LOCATION_ID	REVENUE_HOURS	X_COORDINATE	Y_COORDINATE
2	1-Vermont	155	1.2111	7642378.6	671230.18
3	1-Vermont	156	2.1194	7642446.76	671453.72
4	1-Vermont	172	1.5736	7643709.2	672699.46

Step 2: Add XY Data to ArcMap



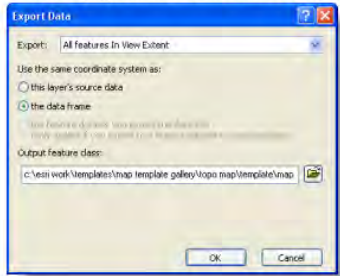


<http://resources.arcgis.com/en/help/main/10.2/index.html#//00s5000001z000000>

### Saving an x,y layer as a feature class

You can save the contents of an x,y layer as a feature class using the following steps:

1. Right-click the x,y layer name and click Data > Export Data. The *Export Data* dialog box opens.



2. Set the output coordinate system and specify the location and name of the new feature class.
3. Click OK to save the new feature class.

### Step 3: Intersect BGs and Revenue Hours

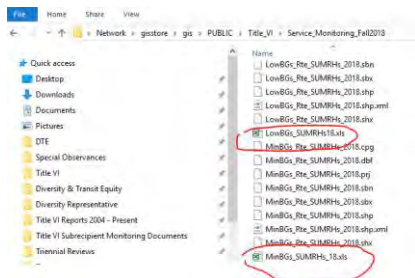
### Step 4: Dissolve Intersect .shp file to FID, Public Route, Location, RH, Geo\_Flps, Low\_BG, and Min\_BG

### Step 5: Dissolve BGs\_Stops\_Dissolve to (check box) Public Route and Min\_BG

Statistical Field => Revenue Hour => SUM

Repeat for 4 & 5 for Low\_BG

### Step 6: Convert Tables into an Excel Spreadsheet and save two .xls files



### Step 7: Prep and clean the data

- Insert a Total\_RH column (add RH from like routes) and a Low\_Pct column (divide sum by total)
  - Routes with only one row of RHs need to be flagged as no for 0 and yes for 1 in the row

	PUBLIC_ROU	SUM_REVENUE HO	TOTAL_RHs	MinPOP	MinBG
	297-NW Yeon/OBRC - no	0	182.9	0.000	0
	32-Oatfield - no	0	97.449	0.000	0
	39-Lewis & Clark - no	0	234.652	0.000	0
	63-Washington Park/Arlington Hts - no	0	313.501	0.000	0
	85-Swan Island - no	0	586.95	0.000	0
	1-Vermont	66.984	216.484	0.309	0
	10-Harold St	744.762	811.746	0.917	1
	11-Duane/Marine Dr	169.222	602.004	0.176	0

- Sort by Low\_Bgs column and remove all the Routes with 0 in the rows leaving all the 1.

- If there are routes with only one row of RHs and they have a 0 (zero) than you don't want to delete those routes. The same for 1 in the row.
- You will now enter this formula =IF(D2>=0.333,1,0) into the MinBG column and drag down.
  - =IF(D2>=0.5,1,0) use this for LowBG

**Revenue Hours Recap Summary Report (Alternative Method)**

Data Source: [https://trinet.trimet.org/static/spa/rpr/current\\_signup/Default.htm](https://trinet.trimet.org/static/spa/rpr/current_signup/Default.htm)

Step 1: Download

Recap Reports			
Route Revenue and Vehicle Hours	Weekday	Saturday	Sunday
Route Hours - With Last Year	Weekday	Saturday	Sunday
Detailed Recap Summary	Weekday	Saturday	Sunday
Detailed Recap Summary by Mode	Weekday	Saturday	Sunday
Service Delivery Report	Weekday	Saturday	Sunday
Vehicle Distribution Report			

Step 2: Export to Excel

Step 3: Utilize previous years' RHweekday\_recap\_summary.xlsx spreadsheet

**Loads**

Step 1: Launch <https://trinet.trimet.org/home/divisions/transportation/operations-support/service-performance-and-analysis/service-perfomance-and-analysis>

Step 2: Select Excel format

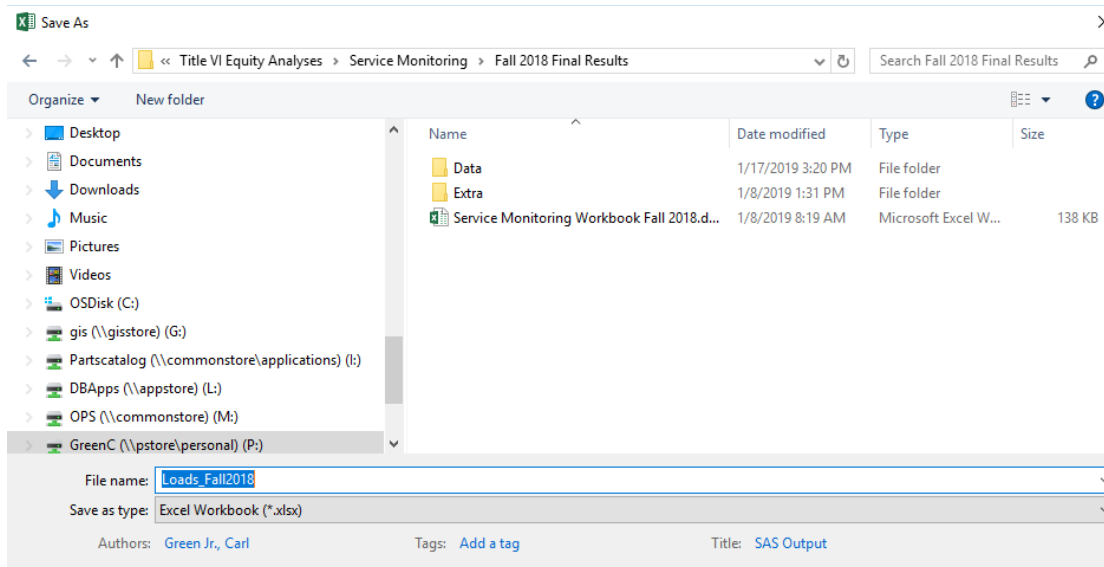
### Quarterly Performance Reports

- Current Signup (Partial) Reports: PDF Excel
- Fall 2018: PDF Excel
- Summer 2018: PDF Excel
- Spring 2018: PDF Excel
- Winter 2017/18: PDF Excel
- Fall 2017: PDF Excel

Step 3: Navigate to appropriate report and download

Ridership by Time of Day Reports			
Weekday Peak Period Ridership Report			
Peak Hour Capacity Report	Weekday	Saturday	Sunday
Time of Day Ridership Report	Weekday	Saturday	Sunday
Boarding Rides/Revenue Hour	Weekday	Saturday	Sunday
Largest Passenger Loads by Time of Day	Weekday	Saturday	Sunday

#### Step 4: Save



Step 5: Clean the data, ensure any missing fields are corrected and make sure it is formatted correctly.

\*Watch out for 96-Tualatin/I-5 when you drag down to copy cell from Column A

Step 6: Sort by Route, then Filter by Time of Day.

Step 7: Calculate the average load by using this formula

=IF(AND(A2=A1,C2=C1),K1,((D2\*G2)+(D3\*G3))/(D2+D3))

Data from this spreadsheet is transposed to the Service Monitoring Workbook via VLOOKUP. Look at the formula in the Service Monitoring Workbook cell... broken down by Time of Day in Loads file.

=VLOOKUP(A2,[Loads\_Spring2020.xlsx]Avg\_Load!\$A\$2:\$K\$158,11,FALSE)

It will be different for AM Peak, Midday, PM Peak

## OTP

Step 1: [https://trinet.trimet.org/static/spa/rpr/fall\\_2018/default1.htm](https://trinet.trimet.org/static/spa/rpr/fall_2018/default1.htm)

Step 2: Select Excel format

### Quarterly Route Performance Reports (Excel)

Please send any questions or comments to [Steve Callas](#) or [Nathan Banks](#).

Fall 2018

Route Level Ridership Reports

Maximum Loads by Trip (NEW!)

Recap Reports

Ridership by Time of Day Reports

Ridership by Trip Reports

On Time Performance (OTP) Reports

Route OTP - Sorted by OTP **Weekday** Saturday Sunday

Route OTP - Sorted by Difference Weekday Saturday Sunday

Step 3. Open Weekday, Saturday, and Sunday reports. Create two tabs in the Weekday spreadsheet (name them Saturday & Sunday. Transfer Column A & B data from the Saturday and Sunday reports into the Weekday spreadsheet and save this file.

Step 4: Change from Web page.html to .xlsx

File Explorer: << Title VI Equity Analyses > Service Monitoring > Fall 2018 Final Results

Search Fall 2018 Final Results

Name	Date modified	Type	Size
Data	1/17/2019 3:20 PM	File folder	
Extra	1/8/2019 1:31 PM	File folder	
Loads_Fall2018.xlsx	1/23/2019 9:37 AM	Microsoft Excel W...	
Service Monitoring Workbook Fall 2018.d...	1/23/2019 9:16 AM	Microsoft Excel W...	

File name: **OTP\_Fall2018.xlsx**

Save as type: Excel Workbook (\*.xlsx)

Authors: Green Jr, Carl      Tags: Add a tag      Title: SAS Output

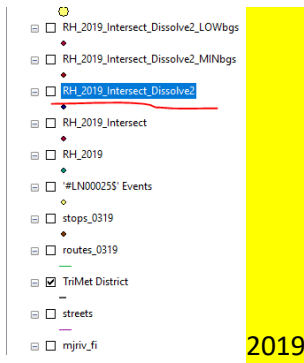
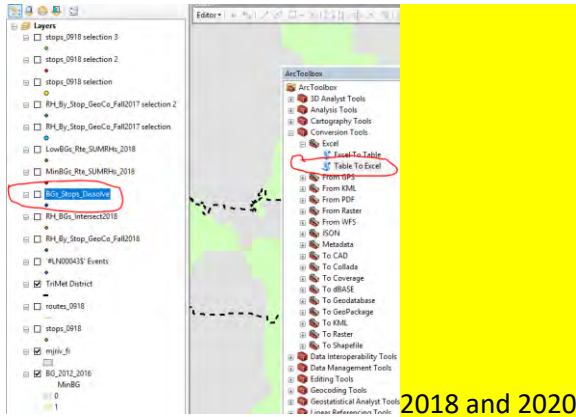
Step 5: Clean the data and format appropriately

WES => <https://trinet.trimet.org/static/financial-analysis/monthly/mpr/>

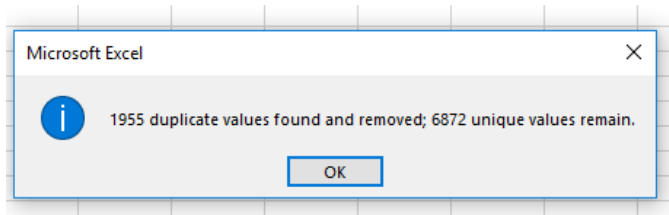
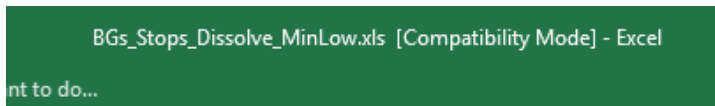
Select the 3 Spring months (March, April, May) if the report is for Spring. Average of three months

## Stops and Amenities

Step 1: Covert below into an Excel spreadsheet



Step 2: Format Min and Low Tables and remove duplicates (check only Location\_ID)



Step 3: Delete PSC/Tram

Step 4: Extract data from Min and Low tabs and insert into StopswithAmenities Table

### Lessons Learned Notes

	A	B	C	D	E
1	PUBLIC_ROU	MinBG	LOCATION_I	Stop ID	Public Stop Name
1327	35-Macadam/Greeley	0	2195	2195	N Greeley & Going Overpass
1328	35-Macadam/Greeley	0	2196	2196	N Greeley & Going
1329	35-Macadam/Greeley	0	2197	2197	N Greeley & Holman
1330	35-Macadam/Greeley	0	2198	2198	N Greeley & Holman
1331	35-Macadam/Greeley	0	2205	2205	N Greeley & Jessup
1332	35-Macadam/Greeley	0	2206	2206	N Greeley & Jessup
1333	35-Macadam/Greeley	0	2208	2208	N Greeley & Killingsworth
1334	35-Macadam/Greeley	0	2209	2209	N Greeley & Killingsworth
1335	35-Macadam/Greeley	0	2212	2212	N Greeley & Lombard St
1336	35-Macadam/Greeley	0	2213	2213	N Greeley & Lombard St
1337	35-Macadam/Greeley	0	2221	2221	N Greeley & Roca Parks Way

\*Note: You are unable to join...

TriMet =>STOP\_0917 Table = 9050 stops

WES Commuter Rail	To Wilsonville	CR	50	13066
WES Commuter Rail	To Beaverton	CR	250	13066
WES Commuter Rail	To Wilsonville	CR	100	13067
WES Commuter Rail	To Beaverton	CR	200	13067
WES Commuter Rail	To Wilsonville	CR	150	13068
WES Commuter Rail	To Wilsonville	CR	200	13069
WES Commuter Rail	To Beaverton	CR	100	13069
WES Commuter Rail	To Wilsonville	CR	250	13070
WES Commuter Rail	To Beaverton	CR	50	13070
WES Commuter Rail	To Beaverton	CR	150	13073

... with N.Banks Revenue Hour (RH) data = 8693 stops

Combines RH for same stop ID for route

RH_By_Stop_GeoCo_Fall2017						
FID	Shape *	PUBLIC_ROU	LOCATION_I	REVENUE_HO	X_COORDINA	Y_COORDINA
8692	Point	WES Commuter	13073	10.6667	7619473.25	651134.88
8691	Point	WES Commuter	13070	13.3333	7616849.36	607850.24
8690	Point	WES Commuter	13069	21.3333	7620364.65	634110.16
8689	Point	WES Commuter	13068	8	7619549.15	651026.05
8688	Point	WES Commuter	13067	12	7615351.35	661230.03
8687	Point	WES Commuter	13066	6.6667	7612062.47	673377.75

Table Does Not Have Object-ID Field

X

The table you specified does not have an Object-ID field so you will not be able to select, query, or edit the features in the resulting layer, or define relates for them.

After you create this layer, you can export it to a shapefile or feature class if you need these functions. To export a layer, right-click it in the Table Of Contents and choose Data>Export Data. Add the exported data to the map as a new layer.

OK Cancel

Explanation for the delta between the RH workbook (8764) and the stops\_0319 file in GIS (9252)

The rev hours file only has a single record for each stop on a route. So if a stop is served in both directions there is only one record. In the GIS data there is a stop record for each direction.

For example the rev hours file has 167 stops for Line 70 while the GIS data has 170. Stops 9368, 13477, and 13633 are served in both directions.

Issues with joining spreadsheet to a .shp file

FIPS and FIPS\_ID have different field types in each of the two files. For example, maybe one file thinks the field is an integer/double but in the other file it's a string.

The fastest workaround for this is weird, but simple. Export the XLS file to a CSV

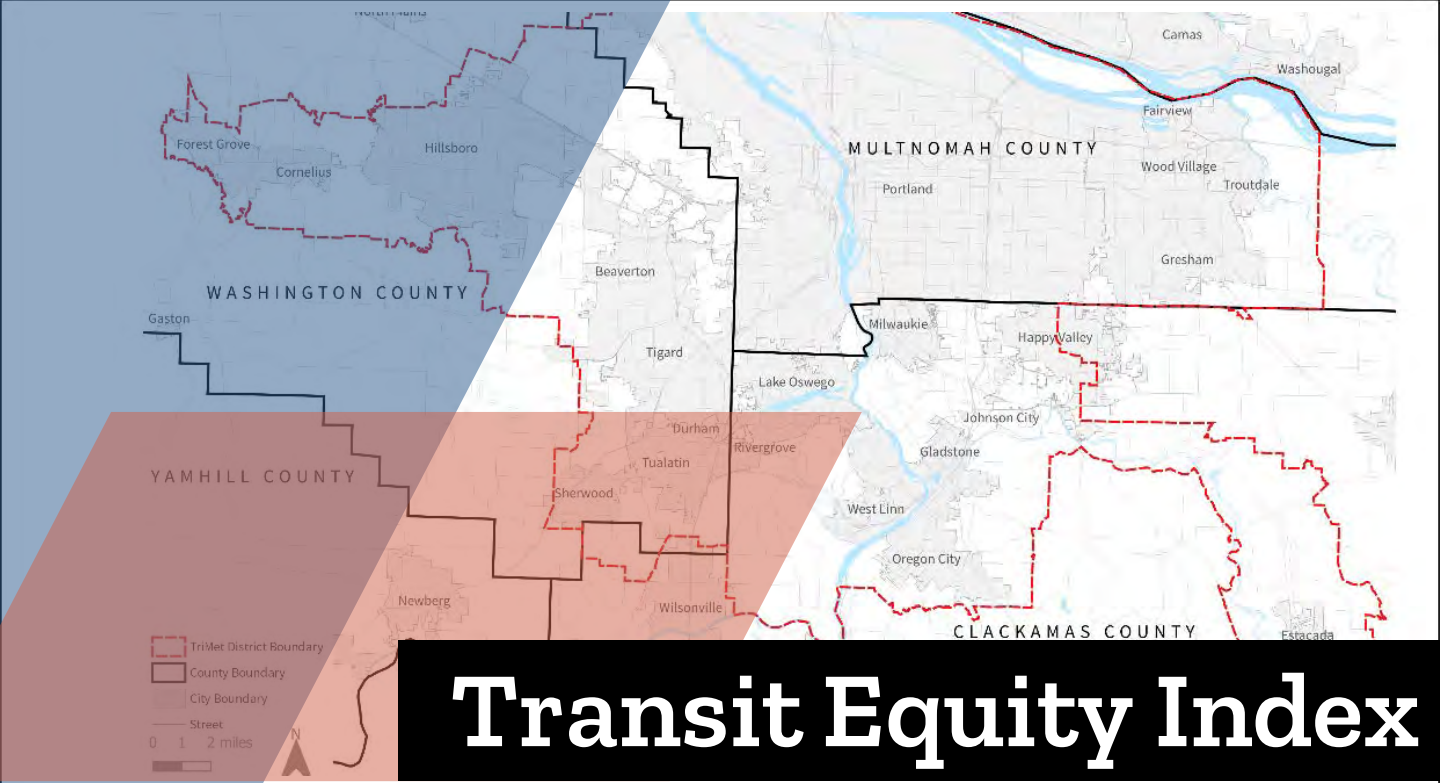
Attached is your spreadsheet as a CSV, along with a file "schema.ini" where you can hard-code specific field types to force Arc to interpret a field as the type you specified. I told it to make sure FIPS\_ID is interpreted as Text, and I can join it to your shapefile now.

You can see the howto for the fix here: <http://desktop.arcgis.com/en/arcmap/10.3/manage-data/tables/adding-an-ascii-or-text-file-table.htm>

Also, if you have it installed, QGIS happily performs joins between numbers and text.

<https://toddata.cnt.org/chapter10.php>

G:\Data\Census\Census2010\geographies\2013\_TM\_Boundary\_Change\bg10\_trico\_tm\_dist13.shp



# Transit Equity Index

**Carl Green Jr., MPA**

**Title VI & Equity Programs Administrator  
Transit Equity, Inclusion, and Community Affairs**





# Presentation Outcomes

## Origin and Foundational Elements

- Title VI of the Civil Rights Act of 1964
- FTA Circular
- Service Equity Analysis

## Transit Equity Index Development and Implementation

- Researching, Testing, and Refining

## A Call for Action and Filling Your Glass


- Equity Defined and Integration

# Title VI of the Civil Rights Act

“No **person** in the United States shall, on the grounds of **race, color** or **national origin**, be excluded from participation in, be denied the benefits of, or be subjected to **discrimination** under **any program or activity receiving Federal Financial assistance.**”



# Stewardship and Compliance

 U.S. Department of Transportation  
Federal Transit Administration

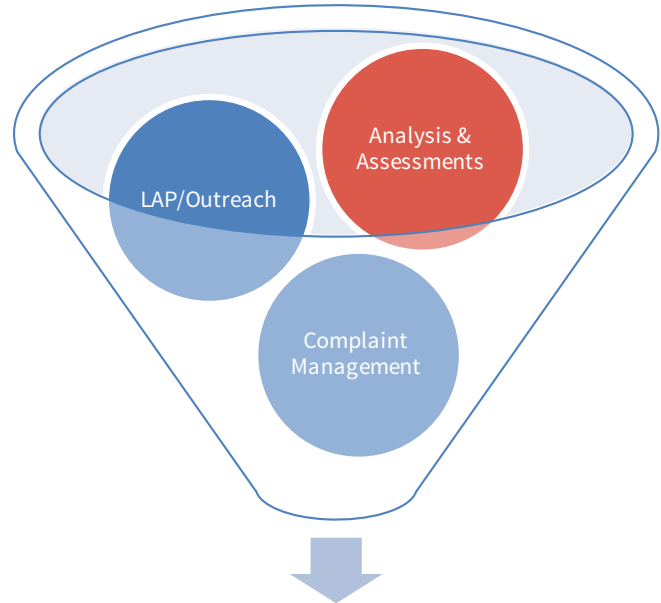
**CIRCULAR**

FTA C 4702.1B

October 1, 2012

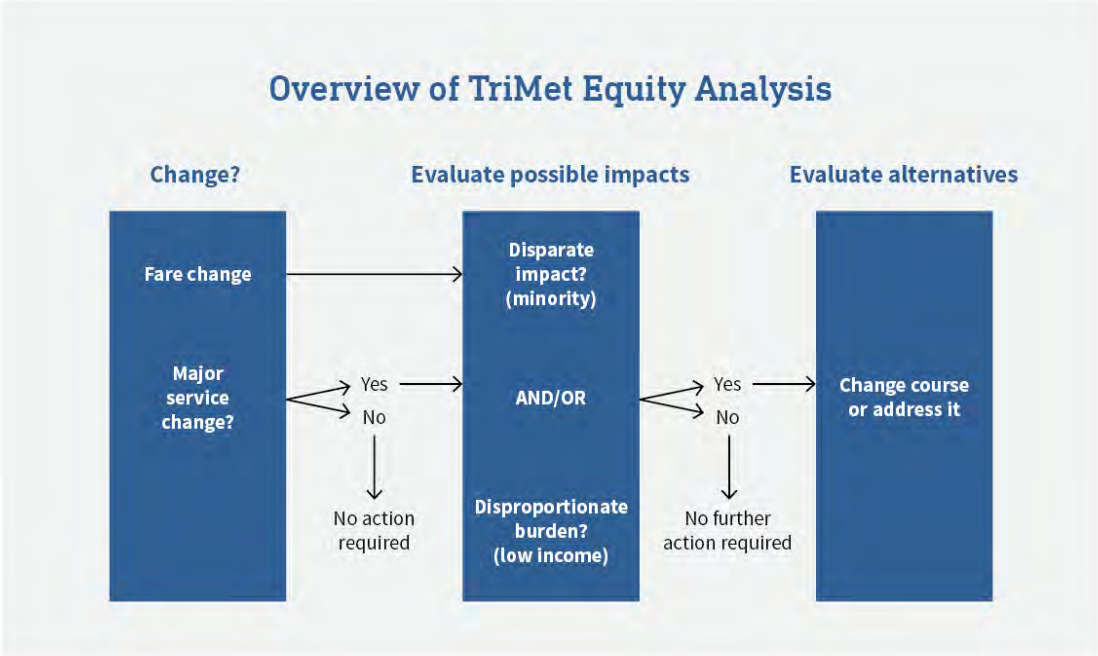
**Subject: TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS**

- PURPOSE.** The purpose of this Circular is to provide recipients of Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out U.S. Department of Transportation ("DOT" or "the Department") Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Persons (70 FR 74087, December 14, 2005).
- CANCELLATION.** This Circular supersedes FTA Circular 4702.1A "Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients," dated May 13, 2007.
- AUTHORITY.**
  - Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.
  - Federal Transit Laws, Title 49, United States Code, Chapter 53.
  - 49 CFR § 1.51.
  - 49 CFR part 21.
  - 28 CFR § 42.401 et seq.
- WAIVER.** FTA reserves the right to waive any requirements of this Circular to the extent permitted by law.
- FEDERAL REGISTER NOTICE.** In conjunction with publication of this Circular, FTA published a notice in the *Federal Register* on August 28, 2012, addressing comments received during development of the Circular.
- AMENDMENTS TO THE CIRCULAR.** FTA reserves the right to update this Circular to reflect changes in other revised or new guidance and regulations that undergo notice and comment, without further notice and comment on this Circular. FTA will post updates on our

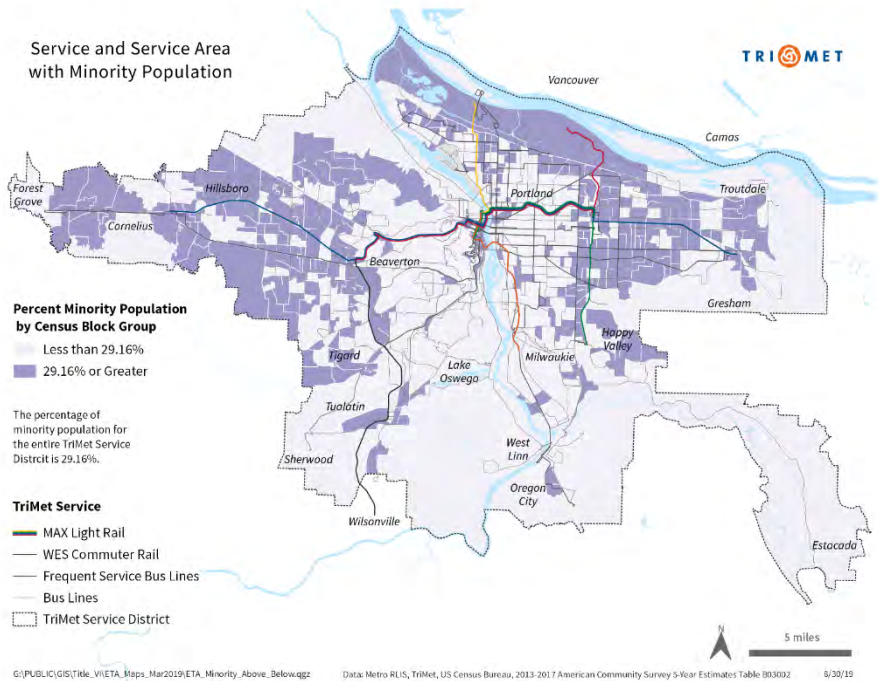


Year-Round and Triennial Review

# Service Equity Analysis



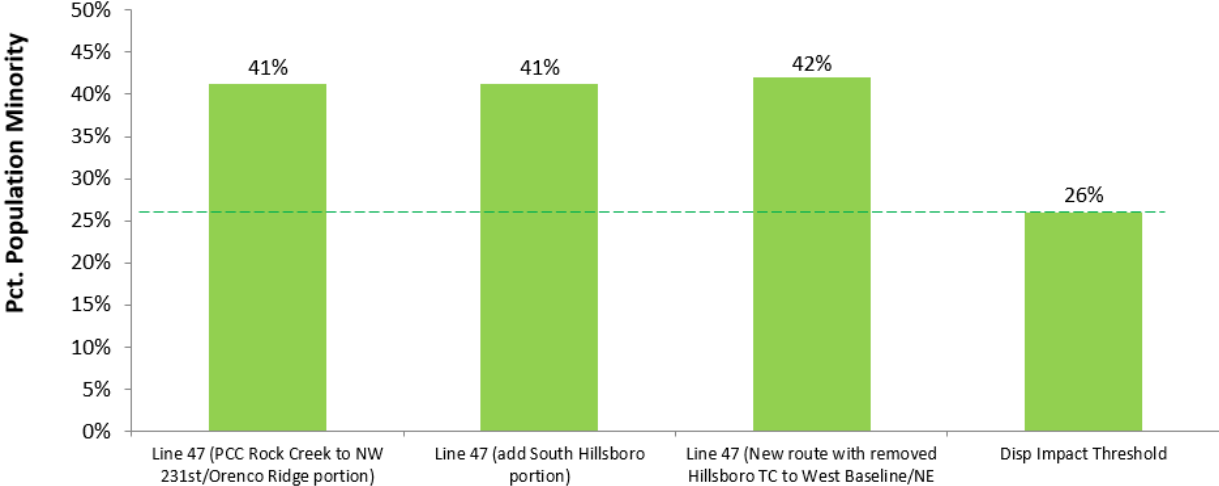
# Service Equity Analysis



G:\PUBLIC\GIS\ETA\_VIETA\_Maps\_Mar2019\ETA\_Minority\_Above\_Below.gxg Data: Metro RLI, TriMet, US Census Bureau, 2013-2017 American Community Survey 5-Year Estimates Table: B03002 9/20/19

# Service Equity Analysis

*Line below threshold = No line-level Disparate Impact*



# Leveraging Title VI

Unified Service Enhancement Plan – Between 2011 and 2016, TriMet engaged Portland area communities in a process to envision a 20-year expansion of TriMet’s bus service

The process divided the region into five sub-areas to help identify geographic and service gaps in the system that can be targeted for new, extended or expanded service.

How can we achieve equity and be more inclusive of other vulnerable, transit-dependent populations?

- Service Equity Analysis a proven and useful assessment
- Three indicators (People of color, low-income, and LEP)

# Equity Index Research

TriMet's Department of Diversity & Transit Equity developed the Transit Equity Index to aid in planning transit service investments

- Transit Equity Advisory Committee
- Leadership Guidance

Only 2 models developed by the University of Illinois-Chicago in 2009 and Northeastern University in 2013 for the purpose of transit service planning

Goal to proactively incorporate equity and accessibility into planning and evaluating potential investments

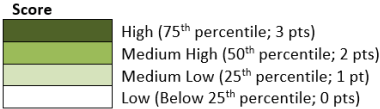


# Measures

1. Minority population
2. Low-income population
3. Limited English Proficiency (LEP) population
4. Senior population
5. Youth population
6. People with disabilities
7. Limited vehicle access households
8. Low and medium wage jobs
9. Affordable housing units
10. Key retail/human/social services/parks

# Initial Application

Equity Indicators for SEP Vision Improvements										
	Minority Pop	Low-Income Pop	LEP Pop	Senior Pop	Youth Pop	Disabled Pop	Ltd. Vehicle Access HHs	Low/Med Wage Jobs	Afford. Housing	Services
Line 3	Medium Low	Medium High	Medium High	Medium Low	Low	Low	High	High	High	High
Line 7	High	High	Medium High	Medium Low	High	Low	Medium Low	Medium High	Medium Low	Medium High
Line 13	Medium High	Low	Medium Low	High	Low	Medium High	Medium Low	Low	Low	Low
Line 26	Medium High	High	High	Medium High	Medium High	High	Medium High	Medium High	Medium High	High
Line 40	High	High	High	Medium High	Medium High	Medium Low	High	Medium Low	High	High
Line 41	Medium Low	Medium Low	Medium Low	High	Low	Medium High	High	High	High	High
Line 60	Low	Low	Low	Low	High	Medium High	Low	Low	Low	Medium Low
Line 73	Low	Medium Low	Low	Low	High	Medium Low	Low	Medium Low	Medium Low	Medium Low
Line 86	Low	Low	Low	Low	High	High	Low	Low	Low	Low
Line 88	Medium High	Medium Low	Medium High	Medium Low	Medium Low	Medium Low	Medium High	High	High	High
Line 97	High	Medium High	High	Medium Low	Medium Low	High	Medium Low	High	Medium High	Medium Low
Line 98	High	High	High	Medium Low	Medium Low	High	High	Medium Low	Medium High	Low
New Line "A"	Medium Low	Medium High	Medium Low	High	Medium High	Low	Low	Medium High	Medium Low	Medium High

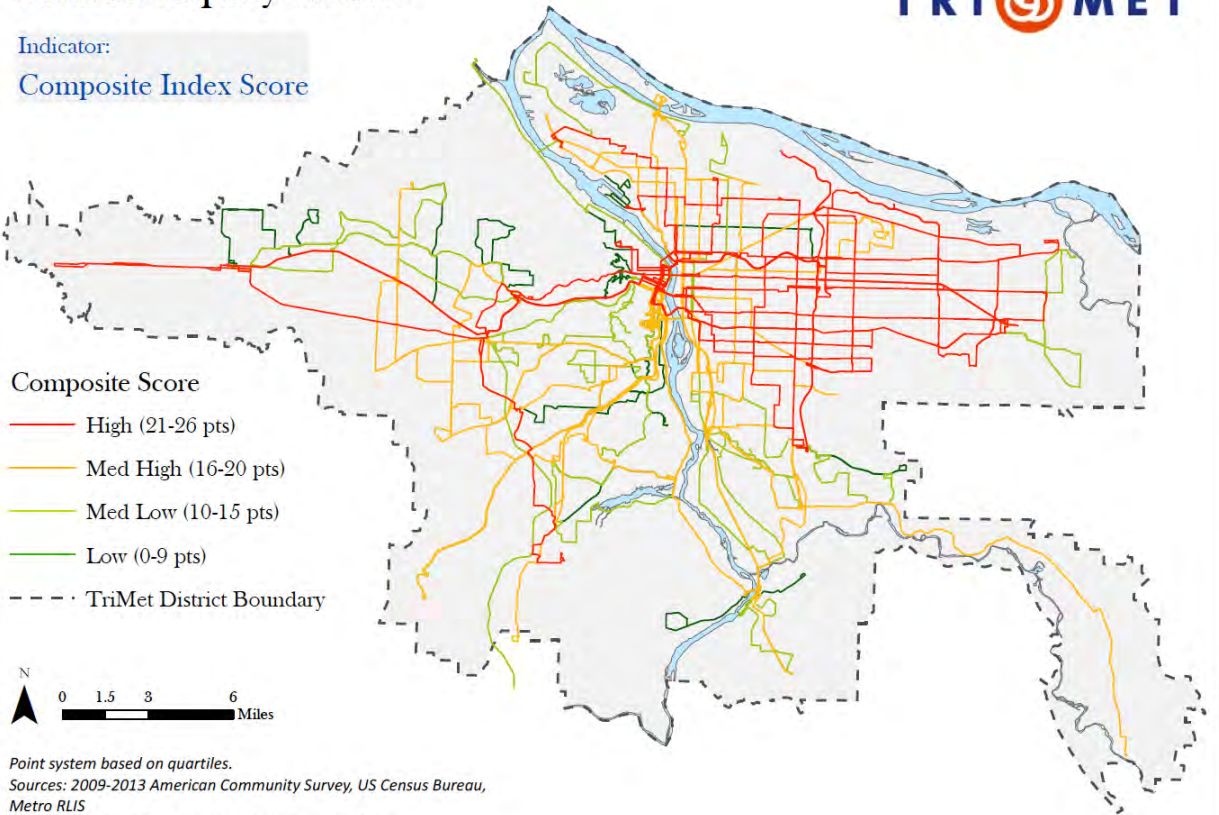


# Transit Equity Index



Indicator:

Composite Index Score



Point system based on quartiles.

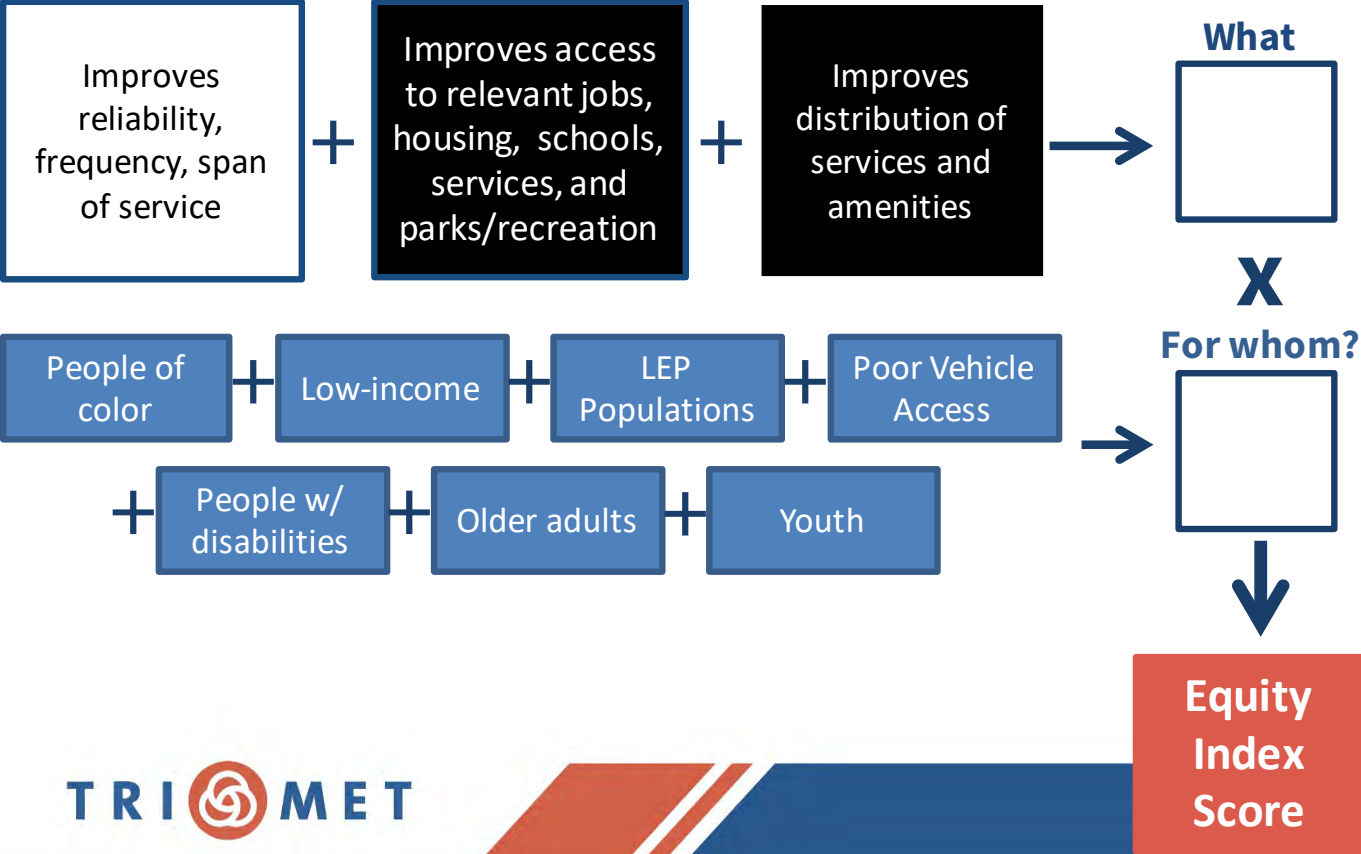
Sources: 2009-2013 American Community Survey, US Census Bureau,

Metro RLIS

2013 Longitudinal Employer-Household Dynamics Survey



# Conceptual Design Flowchart



# Achievable Outcomes

**Equity  
Index  
Score**

**Narrative/  
Qualitative  
Component  
(incl. historical  
context, safety)**

Recommendations  
for equitable  
planning, decisions  
and investments

# Keep Oregon Moving

In July 2017, the Oregon Legislature passed House Bill 2017

Investments to benefit areas with a high percentage of low-income households in the following eight programs:

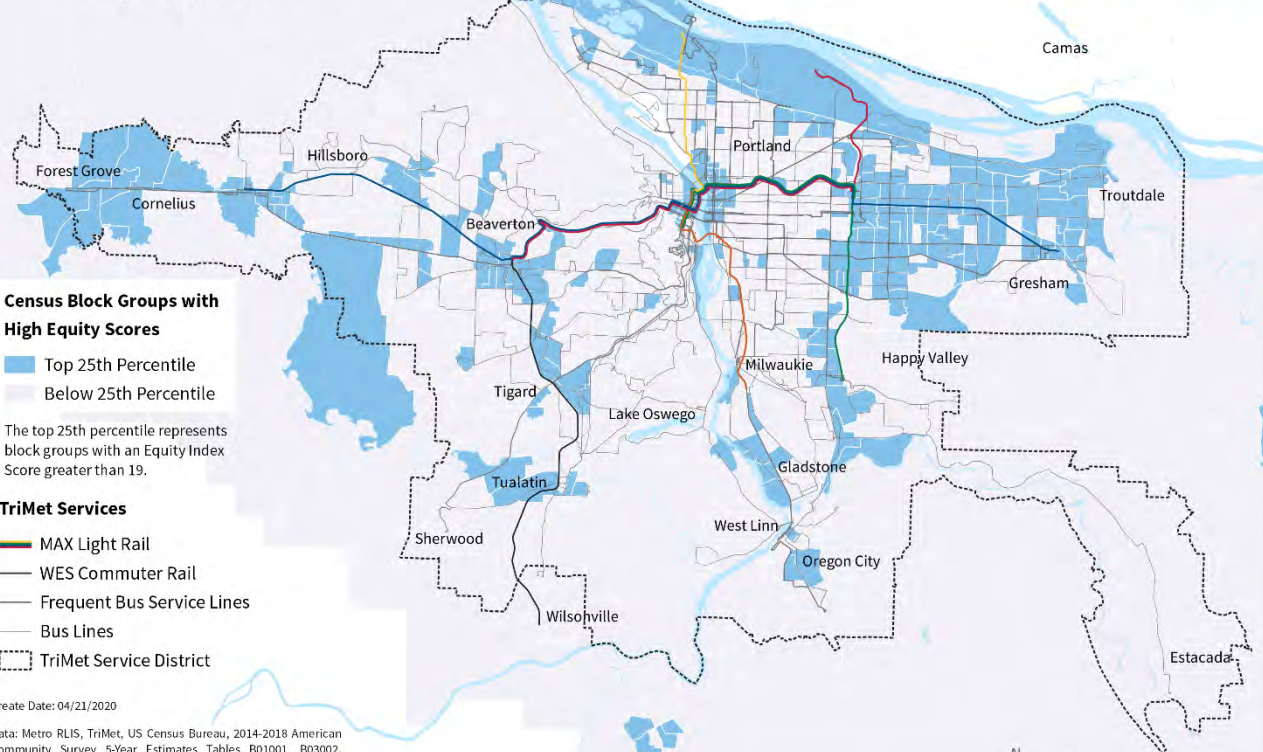
- Low-income Fare
- Regional coordination and community/job shuttles
- Senior and Disabled Transportation Services
- School Transportation
- Electric buses
- Bus Stop Amenities
- Transit Priority
- Physical Security Improvements

# TriMet District Top 25th Percentile of Equity Index Scores



Vancouver

Camas



## Census Block Groups with High Equity Scores

- Top 25th Percentile
- Below 25th Percentile

The top 25th percentile represents block groups with an Equity Index Score greater than 19.

## TriMet Services

- MAX Light Rail
- WES Commuter Rail
- Frequent Bus Service Lines
- Bus Lines
- TriMet Service District

Create Date: 04/21/2020

Data: Metro RLIS, TriMet, US Census Bureau, 2014-2018 American Community Survey 5-Year Estimates Tables B01001, B03002, B08203, B18101, B25056, B25075, B25075, B25085, C16001, C17002, and Longitudinal Employer-Household Dynamics table or\_wac\_s000\_JT00\_2017

Project Location: G:\PUBLIC\GIS\Title\_VI\Equity\_Index\_2020\qgis\_projects\TriMet\_Equity\_Index\_25\_Percentile.ggx



# What you should take away?





# Types of Equity

1. Distributional equity asks if effective and safe transit is available to all, and if its burdens are equally shared. Extensive analysis on how transit serves people measures distributional equity.
  - **Service Equity Analysis**
2. Procedural equity ensures that everyone who would ride transit can contribute opinions, ideas, and information that affect decisions about how transit operates. Robust public engagement creates space for procedural equity.
  - **Public Participation and Language Access Plan** (Open Houses, Transit Equity Advisory Committee, Print and Social Media, Signage at Stops/Platforms, Onboard Surveys and Outreach, Access Transit Partners, and Board Meetings)

# Types of Equity

3. Structural equity relates to who holds decision-making power over operations. Workforces and governing bodies must reflect the diversity of the communities they serve, empower all workers to decision-making, and legitimize their contributions.
  - [TriMet Board and Title VI Committee](#)
4. Restorative equity can be understood as justice. It acknowledges systemic harms — past and ongoing — against certain people and it ensures commensurate investments to repair those harms.

# Title VI/Equity Goals

- Equal access
- Fair distribution of resources and opportunities
- Full and fair participation in decision making
- Meaningful access to programs and services for limited English proficiency populations
- Ensure people of color, low-income, and other vulnerable populations are not unfairly affected by agency level decisions or projects

# Questions?



## **TITLE VI Frequently Asked Questions**

### **1. What is Title VI?**

Title VI of the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal assistance. It prohibits discrimination: whether intentional or where the unintended effect is unduly burdensome. Title VI applies to all recipients of federal financial assistance.

### **2. What is a recipient of federal financial assistance?**

Recipients of federal funds range from state and local agencies (towns, cities, counties, transportation planning agencies, transit agencies, colleges and universities, etc.) to non-profits and contractors. Title VI covers a recipient's entire program or activity. This means that all parts of a recipient's operations are covered. This is true even if only one part of the recipient receives the federal assistance. Sub-recipients are also covered, when federal funds are passed from one recipient to a sub-recipient. Federal financial assistance includes, among other things, grants, training, use of equipment, donations of surplus property, etc.

### **3. What discrimination is prohibited by Title VI?**

Title VI prohibits discrimination based on race, color, or national origin that can limit the opportunity of minorities to gain equal access to services and programs. Among other things, in operating a federally assisted program, a recipient cannot, on the basis of race, color or national origin, either directly or through contractual means:

- deny a program services, aids, or benefits;
- provide a different service, aid, or benefit, or provide them in a manner different than they are provided to others; or
- separately treat individuals in any matter related to the receipt of any service, aid, or benefit.

### **4. Who may file a Title VI complaint?**

Complaints may be filed by any individual or group who believes:

- their rights, under Title VI, have been violated in a discriminatory manner.
- the agency's programs or activities do not comply with federal civil rights laws.
- they have been treated in a disparate manner.

### **5. What is Discrimination?**

An act (or action) whether intentional or unintentional through which a person in the United States, solely because of a protected class such as race, color, or national origin has been otherwise subjected to unequal or unfair treatment under any program or activity receiving financial assistance from a federal agency.

**6. What is Disparate Treatment and Disparate Impact?**

Inconsistent application of rules and policies to one group over another. Discrimination may result when rules and policies are applied differently to members of protected classes.

Adverse effect of a practice or standard that is neutral and non-discriminatory in its intention but, nonetheless, disproportionately affects individuals belonging to a protected group.

**7. What will TriMet do with my complaint?**

Once a complaint is filed, it will be reviewed by the agency to determine whether it has jurisdiction to investigate the issues you have raised. If it is determined that TriMet has jurisdiction to investigate the complaint, the allegations will be investigated. If violations of Title VI are found, TriMet will attempt to resolve them.

**8. What is the time limit for filing a Title VI complaint?**

You should file your complaint as soon as possible, but no later than 180 days after the alleged incident(s).

**9. What if I am subjected to retaliation for making a complaint?**

The civil rights laws prohibit agencies that receive federal funding from retaliating against you, if you report that they engaged in unlawful discrimination. A retaliation claim stands independently from the underlying discrimination claim. If you believe you have been the target of retaliation, you should file a complaint with TriMet's Diversity and Transit Equity department.

**10. Are there any fees connected to filing a complaint?**

No. There are no fees or other charges that a complainant must pay in connection to filing a discrimination complaint.

**11. What is Limited English Proficiency (LEP)?**

Presidential Executive Order 13166 states that people who are limited English proficient should have meaningful access to federally conducted and federally funded programs and activities. Recipients of federal financial assistance must take reasonable steps to provide meaningful access to federally funded programs and activities consistent with Title VI regulations.

**12. Who is an LEP individual?**

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient or "LEP." The individuals may be entitled language assistance with respect to a particular type or service, benefit, or encounter.

**13. What is a federally conducted activity?**

All federal agencies and recipients of federal financial assistance must design and implement a plan to ensure access for LEP individuals to all of its federally conducted programs and activities (basically, everything that it does).

**14. What are recipients of federal funds required to do to meet LEP requirements?**

Recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be flexible and a fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

- 1. Demography** - the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
- 2. Frequency** - the frequency with which LEP individuals come in contact with the program;
- 3. Importance** - the nature and importance of the program, activity, or service provided by the program to people’s lives;
- 4. Resources** - and the resources available to the grantee/recipient or agency, and costs.

As indicated above, the intent of this guidance is to find a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small business, or small nonprofits.

**15. Is Environmental Justice a new requirement?**

No. The recipients of federal-aid have been required to submit assurances of compliance with, and TriMet must ensure nondiscrimination under, Title VI of the Civil Rights Act of 1964, Executive Order 12898 on Environmental Justice, and the U.S. Department of Transportation Order to “Address Environmental Justice in Minority Populations and Low-Income Populations.”

**16. What are the fundamental concepts of Environmental Justice?**

There are three fundamental Environmental Justice principles:

- to avoid, minimize, or mitigate disproportionately high and adverse human health or environmental effects.
- to ensure the full and fair participation of all potentially affected communities in the transportation decision-making process.
- to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

**17. What is the legal basis for addressing the concerns of low-income populations?**

The U.S. Department of Transportation planning regulations (23 C.F.R. 450) require metropolitan planning organizations (MPOs) and States to “seek out and consider the needs of those traditionally underserved by existing transportation systems, including, but not limited to, low-income and minority households.” As required by National Environmental Policy Act (NEPA) and 23 U.S.C. 109(h), impacts on all communities including low-income communities must be routinely identified and addressed.

**18. What types of activities require Title VI and Environmental Justice considerations?**

Title VI and environmental justice apply to all TriMet programs, policies, and

activities, including, but not limited to: contracting, systems planning, project development, implementation, operation, monitoring, and maintenance.

**19. Do all impacts have to be evaluated for Title VI and Environmental Justice, or just health and environmental impacts?**

All reasonably foreseeable adverse, social, economic, and environmental effects on minority populations and low-income populations must be identified and addressed.

**20. How early can issues which give rise to Title VI / Environmental Justice concerns be addressed?**

At the start of the planning process, planners must determine whether Environmental Justice issues exist and use data and other information to: (1) determine benefits to and potential negative impacts on minority populations and low-income populations from proposed investments or actions; (2) quantify expected effects (total, positive and negative) and disproportionately high and adverse effects on minority populations and low-income populations; and (3) determine the appropriate course of action, whether avoidance, minimization, or mitigation. If issues are not addressed at the planning stage, they may arise during project development, or later when they could be more difficult to mitigate and delay project decisions.

Environmental Justice is an important part of the planning process and must be considered in all phases of planning. A truly integrated and effective planning process actively considers and promotes environmental justice within projects and groups of projects, across the total plan, and in policy decisions.