STAFF REPORT

TO: AC Transit Board of Directors
FROM: Michael A. Hursh, General Manager
SUBJECT: AC Transit 2017 Title VI Program

ACTION ITEM

RECOMMENDED ACTION(S):

Consider approving the 2017 update to AC Transit’s Title VI Program.

BACKGROUND/RATIONALE:

As a recipient of Federal funds, AC Transit must follow Federal Transit Administration (FTA) directives to ensure that access to all transit services and the ability to participate in planning processes is equitable and provided in accordance with civil rights and environmental justice laws, orders, and regulations. Recipients of Federal funds must document their compliance with regulations by submitting an updated Title VI Program to the FTA every three years. The last Title VI Program was adopted by the Board in September 2014, and this year’s program must be submitted to the FTA by October 1, 2017. Staff presented the proposed updated program to the Board on August 9th for review; approval of the program now will ensure that AC Transit remains in full compliance with civil rights and environmental justice mandates.

Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Recognizing that low income neighborhoods and communities of color disproportionately bear environmental burdens, Executive Order 12898 mandates a commitment to address environmental justice for people of color and low income populations, and Executive Order 13166 requires recipients of Federal financial assistance to provide meaningful access to persons with limited proficiency in English.

In 2012 the FTA issued guidance to help transit agencies comply with these mandates. As a recipient of Federal funds, the District follows this guidance to ensure that all transit services, access to services, and the ability to participate in planning processes are equitably distributed and provided without regard to race, color, or national origin. Attachment 1 contains this year’s proposed updated program.

The updated program contains a record of compliance efforts since the last update, identifies activities for the District’s ongoing compliance, and describes efforts which will be undertaken to monitor the District’s performance. Integrating awareness of Title VI and environmental justice into the general knowledge base and all activities of the agency continues to be the main goal of the program. Specific processes and activities to support this goal are included in all elements of the program.
The 2017 Title VI Program describes how District staff implemented new elements from the 2014 program, includes updated Public Participation and Language Assistance Plans, and codifies subrecipient monitoring and assistance policies and protocols. It includes a summary of public engagement efforts, equity analyses, and service monitoring conducted since the last program update; new data, in tables and maps, that describe the AC Transit service area and ridership; and information about how the District handles complaints, recruits to advisory committees, and notifies the public of their rights under the program. The program lays out many activities, broad and detailed, which staff will undertake next.

The Title VI Program must be submitted to the FTA by October 1, 2017. Board approval of the program will ensure that AC Transit remains in full compliance with civil rights and environmental justice mandates.

**BUDGETARY/FISCAL IMPACT:**

The Federal guidance driving this program update mandates a number of ongoing procedures, including data collection and analysis, monitoring of programs and activities, providing translation and interpretation, and training, to name a few.

Implementing language assistance measures is likely to carry the greatest ongoing cost, however staff has developed standards to streamline these efforts for efficiency and effectiveness. Money has already been spent for these activities through individual project budgets for several years, so this should not result in a big increase in expenditures. Development of materials and conducting training throughout the District will also carry costs, mostly associated with staff hours.

Implementation of other specific recommendations included in the program will carry undetermined costs, however as implementation steps are identified, proposals will be included in the District budgeting process.

**ADVANTAGES/DISADVANTAGES:**

The District is required to update its Title VI Program every three years, and to follow FTA guidance when updating the program; failure to do so may result in FTA withholding access to pending District grants. Timely adoption of the proposed program will allow staff to meet the FTA mandated submittal date of October 1, 2017.

There are no disadvantages to receiving approving the program.

**ALTERNATIVES ANALYSIS:**

Staff found no alternatives that would be in compliance with FTA regulations. Noncompliance may result in a loss of Federal funding.

**PRIOR RELEVANT BOARD ACTION/POLICIES:**

<table>
<thead>
<tr>
<th>SR13-305e</th>
<th>AC Transit 2014 Title VI Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>SR17-218</td>
<td>2017 Title VI Program Update</td>
</tr>
</tbody>
</table>
ATTACHMENTS:

1. AC Transit 2017 Title VI Program

Approved by: Michael A. Hursh, General Manager
Reviewed by: Denise C. Standridge, General Counsel
Prepared by: Sally Goodman, Senior Transportation Planner
AC Transit
Title VI Program
Adopted [September 13, 2017]

1600 Franklin Street
Oakland, CA 94612
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1. Introduction

The Alameda-Contra Costa Transit District (AC Transit) is an innovative, modern bus system owned by the people of the East Bay and governed by a seven-member, publicly elected board of directors. The District operates bus lines throughout a 364-square mile service area from San Pablo Bay to Fremont, serving 1.5 million people in 13 cities and adjacent unincorporated areas in Alameda and Contra Costa counties.

AC Transit is the East Bay’s largest transit provider and the third-largest public bus system in California, providing almost 180,000 rides per day. AC Transit plays a critical role in the Bay Area’s transportation network, connecting with 16 other public and private bus systems, 25 BART stations, six Amtrak stations, and three ferry terminals.

The District operates three main types of fixed-route bus service: East Bay local, Transbay, and Rapid. East Bay local routes provide local-stop service within the AC Transit service area. Transbay routes provide limited-stop and/or direct service from areas in the East Bay to either the Transbay Terminal in downtown San Francisco, or to other areas outside the immediate local area, such as in San Mateo and Santa Clara Counties. Rapid Service is a designation aimed at a limited-stop frequent service that operates along the District’s major corridors and will include the District’s Bus Rapid Transit route that is currently under construction.

The District also participates in the East Bay Paratransit Consortium with the Bay Area Rapid Transit District (BART) to provide complementary paratransit service under the Americans with Disabilities Act (ADA). The Consortium contracts with a central broker, who in turn, contracts with multiple service providers to provide over 700,000 trips each year. By consortium agreement, BART is responsible for the Title VI compliance requirements of the service.

Title VI of the Civil Rights Act of 1964 provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d). The Federal Transit Administration (FTA) is responsible for ensuring that its funding recipients fully comply with Title VI in their planning and implementation processes. Pursuant to Title 49 U.S.C. Chapter 53, as amended, AC Transit is a designated recipient of funds under FTA sections 5307 and 5309.

AC Transit operates service without regard to race, color, or national origin and is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services.
on the basis of race, color, or national origin, as outlined by the provisions in Federal Transit Administration (FTA) Circular 4702.1.B.

The 2017 AC Transit Title VI Program includes the following General and Transit-specific requirements per Appendix A of FTA circular 4702.1B, as reflected in the table of contents:

**General Requirements (Chapter III)**

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage Minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- A description of how the District monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
- A Title VI equity analysis if the District has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program.

**Requirements of Fixed Route Transit Providers**

- Service standards
  - Vehicle load for each mode
  - Vehicle headway for each mode
  - On time performance for each mode
  - Service availability for each mode
- Service policies
  - Transit Amenities for each mode
  - Vehicle Assignment for each mode
- Demographic and service profile maps and charts
- Demographic ridership and travel patterns, collected by surveys
Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, was aware of the results, and approved the analysis.

A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy.

Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, was aware of, and approved the results of the analysis.

Overview of Title VI Program

The commitment to civil rights compliance is an essential element of the District’s operation. A key aspect of the Program is the goal of integrating Title VI and Environmental Justice awareness into all activities and the general knowledge base of the agency. The efforts associated with updating this Program have assisted the District in developing strategies and practices that will continue to ensure on-going compliance with Title VI and Environmental Justice principles. These strategies include:

1. Title VI/Environmental Justice policies (Major Service Change, Disproportionate Burden, Disparate Impact, Transit Service Monitoring, Notice to Beneficiaries, and Complaint policies) that lay out methods and practices of ensuring compliance, adopted in 2014.
2. District wide Title VI awareness training and materials aimed at educating staff about how Title VI applies to the District as well as to department work activities.
3. Updated Language Assistance Plan and Public Participation Plan that focus on improving and integrating language assistance measures, including enhanced language assistance infrastructure that supports targeted approaches to LEP populations by promoting universal access for all.
4. Language assistance training and materials for frontline staff to ensure that they understand how to request and receive language assistance for their customers, regardless of the language being requested or under what circumstances the assistance is needed.
5. Website improvements for providing information about Title VI, and in languages other than English, by creating a civil rights page that has become the repository for notices, reports, translations, and other relevant information. Also, creation of an “In Translation” page that promotes language assistance availability and provides translated materials for individuals with Limited English Proficiency.
6. Blueprint for future improvements to Board policies and District practices to ensure effectiveness of compliance and monitoring activities, including enhanced guidance for the District’s subrecipient oversight.
2. Certifications and Assurances—Board Adoption of Program
The FTA’s Fiscal Year 2017 Certifications and Assurances were published on December 20, 2016 and current FTA recipients such as AC Transit were required to submit their FY 2017 Certifications and Assurances within ninety (90) days from the date of that publication. The District’s Fiscal Year 2017 Certifications and Assurances were signed and uploaded to TrAMS – the FTA’s online reporting site for recipients of FTA funds – on January 9, 2017. Here is a screenshot from TrAMS of that proof:

![Certifications & Assurances | FY 2017 C&A Affirmations](image)

Certification and Assurance Information
- Fiscal Year: 2017
- Assigned Date: 12/20/2016
- Due Date: 3/20/2017
- Certified Date: 1/9/2017

The AC Transit Board of Directors adopted the Title VI Program contained herein on, [date to be added after Board adoption]
3. Title VI Notice to Beneficiaries

Based upon the adoption of Board Policy 518, a notice to the public about their rights under Title VI has been placed on-board buses, in public ticket offices, at public meeting rooms (such as the AC Transit Board Room), and on the AC Transit website. It is also AC Transit’s practice to place the notice at all major transit stations, such as those being constructed as part of the East Bay Bus Rapid Transit project. The notice contains a commitment to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color, or national origin as protected by Title VI; and details about how to get more information about the District’s Title VI program, including instructions for filing a Title VI complaint. It includes the District’s mailing address, telephone number, and online contact information, and is presented in English, Spanish, and Chinese, along with a statement of Free Language Assistance for persons who speak other languages.

Currently, BART handles Title VI compliance for the East Bay Paratransit Consortium, of which AC Transit is a member. However, the District has been working with the East Bay Paratransit Consortium to make changes to its website that will improve access to information for riders who have limited proficiency in English. Currently, the website includes translations in Spanish and Chinese.

Appendix A contains the Civil Rights Notice to Beneficiaries and complaint form in English, which is available in all of the Safe Harbor Languages from the 2014 Language Assistance Plan. An additional language, Urdu, is added with this program update; associated notices, complaint forms, and other materials will be updated to include that language.
4. Title VI Complaint Procedures

AC Transit's Title VI Complaint procedures are outlined in Board Policy 518, provided in Appendix B, and provided here for reference. Per the previous section, the Title VI Complaint Form is provided in Appendix A in English and is available in all “Safe Harbor” languages other than Urdu, which is currently being translated for the 2017 program year.

**TITLE VI COMPLAINT PROCESS**

The District shall take any Title VI violation complaint seriously and act quickly to identify, resolve, or remediate any identified issue. Additionally, as part of the District’s goal to incorporate environmental justice into its mission and ongoing activities, although low-income populations are not a protected class under Title VI, the District is prepared to receive complaints related to low-income status through the Title VI complaint process.

**A. Communication with Claimant**

It is AC Transit’s intent to communicate with the claimant throughout the Title VI complaint review process, regardless of the outcome of the investigation.

**B. Posting of Title VI Complaint Notification**

The following notice is placed on-board buses, in public ticket offices, and public meeting rooms (such as the AC Transit Board Room) in English, Spanish, and Chinese, with free language assistance offered in all safe harbor languages. Additionally, the notice is available on the AC Transit website, including the complaint form that is available in all safe harbor languages:

AC Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964.

AC Transit also complies with the Americans with Disabilities Act (ADA), which requires transportation providers to make reasonable modifications to ensure programs are accessible to individuals with disabilities. For more information on AC Transit’s civil rights programs and the procedures to file a complaint, please contact us at:

AC Transit Customer Relations

1600 Franklin Street
Oakland, CA 94612
actransit.org/CivilRights
(510) 891-5470
TDD/TTY 771
C. Receipt of Complaint

There are several ways that Title VI complaints are received:

- **Mail**—On-board buses and AC Transit's website currently list instructions on filing a Title VI complaint and provides an address for submitting a Title VI claim. The complaint form is available in all safe harbor languages.
- **Online**—Individuals can register a Title VI complaint through the AC Transit customer feedback webpage, which forwards the item to the Title VI Compliance Review department for Title VI review.
- **Phone**—Individuals may also make a complaint by phone by calling the Customer Service call center.

D. Review of Complaint

A complaint must be filed within 180 calendar days of the date the claimant believes the discrimination occurred. Upon receipt of a complaint, either directly or through the Customer Relations database, the Title VI Coordinator reviews the issue to determine if it raises a Title VI concern (i.e., relates to the exclusion from participation in, or denial of benefits of, services on the basis of race, color, national origin, or low-income status). All Title VI Complaint files are kept for a minimum of 10 years.

If the claim is not related to Title VI, but to other issues, the Title VI Coordinator forwards the complaint to the appropriate department for resolution and sends a letter to the claimant explaining the process, providing a copy to the Legal Department for its files. Departments that are responsible for the resolution of the claim are responsible to investigate the issue and respond to the claimant.

Upon determining that the claim raises a Title VI issue, a Title VI investigation will be undertaken. The Title VI Coordinator will send a letter to the individual to notify the claimant that AC Transit will conduct an investigation of the claim, copying the Legal Department for its files and assistance.

E. Investigating Title VI claims

Staff shall review the complaint to determine if it raises any Title VI issues, using Federal Transit Administration guidance. Staff shall complete their review no later than 60 calendar days after the date AC Transit received the complaint. If more time is required, the Title VI Coordinator shall notify the claimant of the estimated time-frame for completing the review.

If it is found that there is or has been a violation of Title VI, staff will identify immediate remediation for consideration by the General Manager and/or Board of Directors. AC Transit will send a letter to the claimant stating the outcome of the investigation. If a violation exists the claimant will be advised of any remediation action that is being proposed or undertaken. Additionally, staff may recommend improvements to AC Transit's processes relative to Title VI and environmental justice, as appropriate.
Conversely, if the claim is invalid, erroneous, or does not represent a Title VI violation, the Title VI Coordinator will send a letter to the claimant with their findings.

F. Request for Reconsideration

If the claimant disagrees with the response, they may request reconsideration by submitting the request in writing to the General Manager within 10 calendar days after receipt of the response. The request for reconsideration shall be sufficiently detailed to contain any items the claimant feels were not fully understood by the Title VI Coordinator and/or other staff reviewing the claim. The General Manager will notify the claimant of their decision either to accept or reject the request for reconsideration within 10 calendar days. In cases where the General Manager agrees to reconsider, the matter shall be returned to the Title VI Coordinator to re-evaluate.

G. Submission of Complaint to the Federal Transit Administration

Claimant may also file a complaint directly with the Federal Transit Administration at FTA Office of Civil Rights within 180 days of the alleged discrimination at:

Federal Transit Administration
Attention: Title VI Program Coordinator
1200 New Jersey Ave. SE
Washington, DC 20590
5. List of Transit Related Title VI Investigations, Complaints and Lawsuits

No lawsuits or Investigations have occurred during the program update period. The following complaints have been received and completed between July 1, 2014 and June 30, 2017.

Complaints, if any, are tracked in the following format, with the name of complainant protected for privacy concerns.

<table>
<thead>
<tr>
<th>Date Complaint Signed</th>
<th>Date Complaint Received</th>
<th>From (Name)</th>
<th>Category</th>
<th>Description of Complaint</th>
<th>Finding</th>
<th>Staff Response / Action</th>
<th>Date of Response</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>R=Race</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>C=Color</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>L=National Origin/LEP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Title VI Lawsuits, Investigations and Complaints July 1, 2014 to June 30, 2017

<table>
<thead>
<tr>
<th>Number</th>
<th>Date Complaint Signed</th>
<th>Date Received</th>
<th>From (Name)</th>
<th>Category</th>
<th>Description of complaint</th>
<th>Finding</th>
<th>Staff Response / Action</th>
<th>Date of Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>8/28/2014</td>
<td>9/8/2014</td>
<td>R</td>
<td></td>
<td>Complaint of pass up - no mention of why they thought it was discriminatory</td>
<td>Claim of one driver’s behavior, not discrimination</td>
<td>Responded and referred complaint to Transportation</td>
<td>9/18/2014</td>
</tr>
<tr>
<td>2</td>
<td>9/10/2014</td>
<td>9/18/2014</td>
<td>Other</td>
<td></td>
<td>ADA complaint</td>
<td>Not a Title VI complaint</td>
<td>Referred complaint to Transportation</td>
<td>9/18/2014</td>
</tr>
<tr>
<td>3</td>
<td>9/11/2014</td>
<td>9/15/2014</td>
<td>R, C</td>
<td></td>
<td>Complaint of rude behavior by operator - no mention of why they thought it was discriminatory</td>
<td>Claim of one driver’s behavior, not discrimination</td>
<td>Responded and referred complaint to Transportation</td>
<td>9/18/2014</td>
</tr>
<tr>
<td>4</td>
<td>not provided</td>
<td>10/6/2014</td>
<td>Other</td>
<td></td>
<td>Wanted a response to comments provided to Public Hearing on 2014 Title VI Program</td>
<td>Public hearing comment, not complaint about discrimination</td>
<td>Provided explanation of public hearing process and how complainant’s comments were received/heard by the Board and considered in the Planning process</td>
<td>10/17/2014</td>
</tr>
<tr>
<td>5</td>
<td>not provided</td>
<td>11/14/2014</td>
<td>R</td>
<td></td>
<td>Complaint of harassment by supervisor - no mention of why they thought it was discriminatory</td>
<td>Claim of one employee’s behavior, not discrimination</td>
<td>Responded and referred complaint to Transportation</td>
<td>11/19/2014</td>
</tr>
<tr>
<td>6</td>
<td>11/3/2015</td>
<td>11/10/2015</td>
<td>R, C, L</td>
<td></td>
<td>Alleged that buses in communities of color are always late, specifically Routes 1/1R and 72/72R.</td>
<td>Possible Title VI complaint</td>
<td>Conducted research and provided information about on time performance and reliability throughout the District, including in communities with Title VI-protected populations; encouraged complainant to participate in the service expansion plan public hearing process underway at time of complaint.</td>
<td>11/16/2015</td>
</tr>
<tr>
<td>7</td>
<td>5/7/2016</td>
<td>5/8/2016</td>
<td>C</td>
<td></td>
<td>Complaint of discourteous conduct by an Operator - no mention of why they thought it was discriminatory</td>
<td>Claim of one driver’s behavior, not discrimination</td>
<td>Responded and referred complaint to Transportation</td>
<td>5/10/2016</td>
</tr>
<tr>
<td>8</td>
<td>2/28/2017</td>
<td>2/22/2017</td>
<td>Doesn’t state</td>
<td></td>
<td>Complainant doesn’t see newer buses where he rides; thinks it’s discriminatory</td>
<td>Data did not support allegation</td>
<td>Responded with data and information</td>
<td>2/28/2017</td>
</tr>
</tbody>
</table>
6. Public Participation Plan

In order to carry out its mission of connecting communities with safe, reliable, and sustainable service to its fullest potential, the Alameda-Contra Costa Transit District (AC Transit) is committed to engaging all members of the community – informing riders, residents, and businesses about changes in service or fares, and providing opportunities to participate in meaningful decision-making about plans and projects that may affect their lives or livelihoods.

Public engagement efforts at AC Transit recognize the diversity in the District’s service area and among riders. This Public Participation Plan (PPP) was created to identify effective methods of engaging with communities regardless of race, color, national origin, ability to speak English, or income status, as protected by Title VI of the Civil Rights Act and associated regulations. In addition, the District strives to reach people who may have been traditionally underserved or who are protected by other civil rights legislation and regulations, including on the basis of sex, disability, age, citizenship or legal status, religion, sexual orientation, gender identity, and military or veteran status.

The Public Participation Plan aims to encourage partnerships with these diverse communities, ensuring that their concerns are heard and their contributions are included along with those of the greater population. The plan provides an assessment of how well we are doing toward that goal along with a recent history of public engagement activities carried out by AC Transit.

Appendix C provides the Public Participation Plan in its entirety.

Plan Background

The plan was developed by an inter-departmental working group to gain an understanding of how public engagement occurs within the AC Transit District and build on members’ intimate knowledge of the community. The working group considered past engagement efforts to identify methods that have been successful in the past, and considered the needs of people with limited proficiency in English, in addition to the needs of people of color and low-income populations in determining outreach and engagement strategies.

Plan Context

The AC Transit service area is a very diverse district: according to 2015 population estimates, approximately 71% of the population is people of color, with Asian or Pacific Islander (27%), Latino/Hispanic (26%), and African American/Black (14%) making up the largest groups. A large number of residents speak languages other than English and many of them (20%) have limited English proficiency (LEP).

Income diversity is also a critical piece in understanding the community, as more than 30% of the population has low or very low household income. A large number of area residents are transit dependent; they do not have a driver’s license or access to a car. The service area is also home to
businesses and employers, a strong percentage of which are Asian, Latino, and African-American owned. Because of this broad diversity in the District, it is crucial that engagement with stakeholders includes a wide array of inclusive and representative methods.

Understanding these demographics is especially critical when seeking public engagement for issues associated with service or fare changes, as the outreach should engage all communities in decision-making as well as provide advance notification after changes have been approved.

The PPP is guided by the following principles:

- That the District’s decisions consider the interests and concerns of affected people and entities;
- That the public engagement techniques and activities are relevant in terms of timeliness, communities reached, and issues examined;
- That the full range of opportunities for participation is made known and communicated broadly throughout the District; and
- That community input received through public engagement processes is considered and incorporated to the extent possible.

Existing Outreach and Public Participation Tools
AC Transit currently has a number of outreach tools that have been used to communicate information on programs and plans to the public, in addition to strategies that are used to engage the public during the planning and development phase of service and fare changes, studies, or projects. These tools include the following measures that are identified in the AC Transit Public Participation Plan, described in greater detail in the full plan in the Appendix:

1. Traditional Media (Paid Advertising, Editorial Coverage)
2. Digital Communications (Website, Social Media, Email, Videos)
3. Printed Materials (Brochures, Signage, Flyers, Maps, Direct Mail)
4. Public Meetings, Workshops, and Hearings
5. Community Engagement (CBO partnership, Community Events and associated Outreach)
6. Dedicated Project or Program Centers (BRT Information Center and Customer Service Center)
7. Telephone Information and Comment Lines
8. Market Research and Surveys

Plan Recommendations
Several key recommendations emerged through the Public Participation Plan development process that will help to strengthen the consistency and continuity of the District’s community engagement efforts:
A. **Develop Public Engagement Strategies that Reflect the Community**

When planning public outreach and involvement activities, staff should consider the unique characteristics and needs of the community, especially those of Title VI-protected populations and traditionally underserved communities. Each opportunity for public engagement should follow the public engagement process outlined in the plan as a guide to help identify stakeholders’ needs and the methods of outreach most likely to be effective. The goal of this approach is to provide information and opportunities to these communities in formats, locations, and times that maximize their participation.

B. **Be Flexible and Creative When Planning Public Engagement**

The PPP recommends a consistent, strategic approach to community engagement. At the same time, each situation demands its own approach and process. Staff should be encouraged to be creative when developing engagement plans, making use of new information, technology, and trends as they arise. Doing so will help to ensure more meaningful, inclusive, and effective public involvement.

C. **Continue Integrating Language Assistance Measures In Public Engagement Activities**

The Language Assistance Plan (LAP), contained separately in the Title VI Program, offers recommendations on how best to communicate with people with limited English proficiency (LEP). Using methods recommended by the Federal Transit Administration, staff identified languages spoken in the District, conducted an internal audit of existing outreach efforts, and received suggestions from Community Based Organizations (CBOs) to help enhance AC Transit’s communications with LEP residents. The District has made great strides incorporating LAP recommendations, and should continue incorporating these strategies and techniques into every outreach and public engagement activity.

D. **Encourage Opinions and Involvement Across A Broad Spectrum**

AC Transit welcomes all input received through the public engagement process and is committed to using that feedback to improve its community engagement efforts. The PPP recommends that staff embrace the development of tools, such as community feedback forms, that allow them to evaluate the effectiveness of their engagement activities.

E. **Develop Internal Handbook To Streamline And Enhance Public Engagement Efforts**

District staff have expressed their desire for a resource that integrates basic outreach guidance, protocols, and experiences from past projects, and which can serve as a reference for future public engagement efforts. Toward this end, an interdepartmental public engagement working group (PEWG), consisting of staff from seven departments, has formed to guide the development of an internal public engagement handbook. The envisioned handbook will define roles and responsibilities in the community engagement process; improve
communication and internal coordination between departments; provide sample process flow charts, budgets, and public information collateral; establish methods for retaining and reusing draft materials, including narrative content and translations; and point to a repository for past and ongoing projects. The handbook will also provide examples of major activities requiring public engagement and recommended baseline activities. The handbook will provide clear and practical instructions for both experienced staff and those new to AC Transit.
7. Language Assistance Plan

AC Transit wholeheartedly supports the overriding goal of providing meaningful access to its services by persons with limited English proficiency (LEP) and the entire community.

Federal regulations require that agencies receiving federal funds, including AC Transit, “must take reasonable steps to ensure meaningful access to their programs and activities by Limited English Proficient persons.” Toward helping agencies meet that goal, the U.S. Department of Transportation (DOT) created a handbook which provides step-by-step instructions for conducting the required LEP needs assessment with the use of a four-factor analysis.

AC Transit undertook the needs assessment with a determination that all reasonable efforts will be made to ensure no member of its public is left underserved due to a limited ability to speak, read, write, or understand English. AC Transit believes that providing language assistance to persons of limited-English-speaking abilities will have a positive impact not only on LEP persons themselves, but also on AC Transit ridership in general. Reaching out to the LEP population sends a positive – and truthful – message that they are welcome and appreciated.

Appendix D provides the full four-factor analysis and Language Assistance Plan.

The Four-Factor Assessment

This four-factor framework consists of assessing:

1. Number and proportion of LEP persons served or encountered in the eligible service population;
2. Frequency with which LEP individuals come into contact with the program, activity, or service;
3. Nature and importance of the program, activity, or service provided by the program; and
4. Resources available to the recipient and costs.

Factor 1 Results: Identification of LEP Individuals

Community-based organizations collectively serving hundreds of thousands of persons with LEP and other populations each year answered survey questions online and spent additional time answering follow-up questions for this assessment. In addition, a staff review of Census data shows that of the total population in the AC Transit Service Area that speaks a language other than English, 20.45% of the total population speak English less than very well. This is the LEP population.

By far, the most prevalent languages spoken in the AC Transit Service Area are Spanish and Chinese, accounting for nearly seven in ten of all LEP speakers in the AC Transit Service Area. The updated analysis identifies the number of languages spoken by more than 1,000 people within the service area, which is the DOT’s “safe harbor” designation threshold. That number has increased to 16 since the
last update three years ago, with the addition of Urdu. As in previous years, the top five languages – adding Tagalog, Vietnamese, and Korean to Spanish and Chinese – account for more than 80% of all LEP speakers.

AC Transit has effectively two tiers of languages based on predomination of speakers. The “predominant” or “primary” languages are Spanish and Chinese. All other languages are “Safe Harbor” languages.

Factor 2 Results: Frequency of Contact by LEP Persons with AC Transit Services
About 17% of all AC Transit employees surveyed say they encounter LEP riders many times a day. These LEP riders are most often seeking routes/wayfinding information, fares, and schedules. Requests regarding detours and deviations have increased since the last update.

AC Transit’s employees’ assessments of the most predominant languages spoken using AC Transit are in line with the Factor 1 data on the types of languages spoken in the service area. As reported by employees, the top three languages spoken by riders with LAP are Spanish (76.8%), Chinese (68.6%) and Vietnamese (23.2%). Additionally, since the last Title VI Program Update, 812 LEP callers have been helped using over-the-phone interpretation from the AC Transit call center, with the overwhelming majority (80.4%) of these callers speaking Spanish. Nearly all of the remainder, or 17.1% of all calls, were in Chinese, either Cantonese or Mandarin.

LEP persons themselves indicated that they use public transportation for a wide range of destinations and the level of use indicates clearly how the LEP community relies heavily on public transportation in all aspects of daily life. According to the 2012 Ridership survey, nearly one-third (32%) of all riders speak a language other than English at home. Spanish speakers make up 17% of AC Transit’s ridership base. The next-most often spoken languages among riders are Mandarin (3%), Cantonese (2%), and Tagalog (2%).

Factor 3 Results: Importance to LEP Persons of AC Transit’s Programs, Activities, and Services
According to direct communication with riders with LEP in 2014, LEP persons reported a heavy reliance on AC Transit. Despite an overall satisfaction with the system, and while most find it easy to use, about 45% of all riders reported encountering problems when riding AC Transit because they do not speak English. Generally speaking, however, the problems they encounter are ones that any rider might encounter. They place great importance, however, on the types of information that AC Transit shares with its English-speaking riders. Of greatest importance are signs at the bus stop and on the bus in their native languages and the ability to communicate in their native language when they call AC Transit or visit its Customer Service Center or its website.
Asked in 2017 about the best way to obtain input from their populations in order to better serve them, the CBOs suggested a number of steps that would assist their LEP populations. In many cases, they were efforts that AC Transit already carries out, including conducting intercept surveys, attending community meetings, and asking employees for input. Ensuring that critical information is available in languages most commonly spoken within AC Transit’s service territory ensures the access of these LEP riders to AC Transit service.

Factor 4 Results: Available Resources and Costs of Language Assistance Services
Over the last three years, AC Transit has undertaken many programs to assist riders with LEP use AC Transit services and participate in planning activities. In FY 16/17, a little under $70,000 was spent toward language assistance measures. This does not include project-specific expenditures associated with the East Bay BRT project, which includes translations of printed materials and interpretation services in their own project budget, or other translation and interpretation efforts that may have been associated with specific projects (and rolled into those project budgets) It is AC Transit’s intention to fully maximize available funds to reach the greatest number of LEP persons and have the greatest impact within its service territory.

Language Assistance Plan
There are a number of recommended initiatives stemming from the four factor analysis that AC Transit intends to undertake to support the goal of improving LEP persons’ meaningful access to AC Transit’s services, programs, and activities, including:

- Expansion and publicizing of over-the-phone interpretation services for use by all AC Transit staff and LEP riders
- Standards for posting documents or text online in a format which enables the content to be easily translated
- Creation of an internal interdepartmental Public Engagement Working Group to develop and advance public engagement strategy, including language assistance policy and practices
- Review of data about languages spoken within the immediate geographic area of specific projects and providing language assistance as appropriate for the area.
- Tracking non-English use by callers, visitors to Customer Service Center, and website
- Regular review and updating of data and the LAP as appropriate.

Many of the recommendations included in the Language Assistance Plan are reflected in the Public Participation Plan. It is AC Transit’s intention to integrate the results of the four-factor analysis and the goals of the LAP into all public-facing activities carried out by the District.
8. Membership of Transit Related Decision-Making Bodies

The AC Transit Board of Directors is directly elected and Board Members are not required to provide information about their ethnicity. Additionally, the District has only one Board-appointed advisory group, whose racial and ethnic composition is provided below.

<table>
<thead>
<tr>
<th>Committee Name</th>
<th>White - Not Hispanic Origin</th>
<th>Latino/Hispanic</th>
<th>African American/Black</th>
<th>Asian or Pacific Islander</th>
<th>American Indian/Alaska Native</th>
<th>Did Not Respond</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accessibility Advisory Committee</td>
<td>6</td>
<td>2</td>
<td>5</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>14</td>
</tr>
<tr>
<td>(June 2017)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
9. Sub-recipient Monitoring Program

AC Transit recognizes the need to monitor their subrecipients’ compliance with the FTA circular. While AC Transit does not regularly have subrecipients, AC Transit sometimes is requested to participate in a funding relationship in order to pass through federal funds to other public agencies, non-profits, or community based organizations. AC Transit currently has two subrecipients that generate compliance monitoring:

The City of Emeryville has been a subrecipient since 2014, and has been monitored annually since that time. Their Title VI program was adopted in 2015.

Eden I & R is a new subrecipient since the 2014 Title VI Program update; AC Transit assisted this subrecipient in preparing their first Title VI program which was adopted in April 2017.

Subrecipient Assistance and Monitoring

AC Transit conducts the following subrecipient procedures and protocols to facilitate subrecipient compliance with C4702.1B:

The Grants department subrecipient management policies and procedures provide instructions and timelines for how AC Transit staff monitor subrecipients’ Title VI compliance in accordance with the FTA circular. The procedures state that AC Transit staff will:

- notify subrecipients of their responsibilities;
- offer resources and information as needed, and provide technical assistance as requested, to support subrecipient’s development of a Title VI program;
- check in monthly until the subrecipient’s Title VI program is adopted by their governing body;
- provide any assistance requested to assist subrecipient’s full implementation of their program; and
- conduct annual compliance checks to verify subrecipient’s compliance with their Title VI program.

The following provides a summary of the direct activities related to subrecipient monitoring and assistance that was conducted for each subrecipient since the 2014 Title VI Program.

CITY OF EMERYVILLE

11/2014 to 1/2015: AC Transit staff provided assistance with Complaint Forms, Notice to Beneficiaries, demographic mapping help, and other general requirements of C4702.1B

5/2015 to 7/2015: Communication regarding City Council adoption of program; review of draft Title VI program and other technical assistance
10/2016 to 1/2017: Communication regarding Title VI program implementation, including Title VI complaints or other implementation issues.

1/2017 to 7/2017: AC Transit staff site visit that resulted in compliance issues and no evidence of program implementation. Follow up by City of Emeryville staff to get city into compliance that resulted in verification of compliance of the majority of Title VI elements. Will need continued monitoring for provision of language assistance measures.

EDEN I & R

3/2017 to 4/2017: Notification by AC Transit of Eden I & R’s Title VI responsibilities, including offered technical assistance, draft policy templates, FTA Title VI web resources, example documents and board resolutions.

4/2017: Provided technical assistance for developing language assistance measures, addition of Google Translate to website, and confirmation of telephone interpretation services already in place at Eden I & R. Eden I & R provided draft Title VI program.

5/2017: Assisted in minor edits to Title VI program. Eden I & R verified Final Title VI Program along with board adoption. AC Transit staff notified them of continuous compliance monitoring.
10. Facility Equity Analysis

During the last three years, AC Transit has not undertaken a Facility Equity Analysis nor proposed the construction of a transit facility.

AC Transit has one major investment currently under construction—the East Bay Bus Rapid Transit (BRT) project—that was the subject of a NEPA planning and environmental process in 2012. The Record of Decision is included in Appendix E for reference.
11. Service Standards

Board Policy 545 establishes the District’s standards for fixed route service allocation and delivery. It provides the basis for the Title VI monitoring program contained in section 15 of this Program Update. Policy 545 is located in Appendix F.

Policy 545 is based on the District goal of providing service in an efficient, effective, and equitable manner that is continually examined to ensure that service is allocated correctly, in accordance with stated objectives. Its primary tenets are that AC Transit lines with high patronage should run frequently enough that, over most of the service period, passengers do not need a schedule to use the system. It also recognizes that density of population is a key driver of high frequency, well-used transit service. As such, routes in the denser parts of the service area will run more frequently, routes will be spaced closer together, and the evening service will run later. More frequent service allocation will be based upon a combination of both density and demand.

Board Policy 545 contains service standards for the following elements, as required by C4702.1B:

- Vehicle load for each mode
- Vehicle headway for each mode
- Service availability for each mode

Board Policy 545 does not currently include a standard for on-time performance. However, AC Transit does monitor on time performance, using the definition that service that is no greater than one minute early and no greater than 5 minutes late—measured upon arrival at a timepoint—is considered on time. The District’s on-time performance target of 72% applies to all the service that AC Transit operates. This standard will be more fully clarified when Board Policy 545 is next updated.
12. Service Policies
Board Policy 545 contained in Appendix F includes both service standards and service policies. The service policies include:

- Transit Amenities for each mode
- Vehicle Assignment for each mode

Even though AC Transit does not install or own shelters or benches, it does provide guidance on bus stop amenities. Specifically, District staff will recommend shelter and bench placement locations based on the geometry of the landing areas for the bus wheelchair ramps to the municipalities responsible for the locations. Due to the availability of new technology, the existing Board Policy 545 does not include recommendations for the installation of “Next Bus” type of improvements or other high tech items that are now more cost effective to implement. These types of amenities will be addressed in future updates to Board Policy 545.

According to Board Policy 545, vehicle assignment is made primarily on route service characteristics, such as geography and ridership demands of each bus route.
13. Demographic and Service Profile Maps

Demographic and service profile maps were created for the Title VI report and are presented in Appendix G. The maps represent AC Transit’s capacity to analyze and depict geospatial data about population relative to the built environment and transit service operated. While not all the maps depict all of the underlying data, because that would add too much clutter and make the maps difficult to read, AC Transit has the ability to develop maps and analytical tools necessary to aid planning and analysis in their service area.

All of the attached maps include the AC Transit service area boundary as defined in the 2010 redistricting effort carried out by the AC Transit service development staff. The maps also include an “AC Transit Route” layer that shows all AC Transit bus routes effective March 26 2017. This data is available on the AC Transit website (www.actransit.org).

Map 1 shows the attractors and generators of trips in the AC Transit service area. These include hospitals, parks, airports, high schools, colleges and universities, and large retail centers. This map also includes important elements of the transportation network: highways, arterials, BART stations, Amtrak stations, ferry terminals, and transit centers. These data come from the following sources: AC Transit service development, the Metropolitan Transportation Commission, the Association of Bay Area Governments, and from the US Geological Survey (USGS).

RACE AND ETHNICITY

The analysis shows that people of color make up 71.31% of the AC Transit service area.

Map 2 highlights the census block groups that have a higher percentage of residents that self-identify as people of color (POC) than the percentage in the service area as a whole. These percentages were calculated using data from the 2011-2015 5-Year Estimate from the American Community Survey (ACS) and rounded to the closest whole number. The block groups with a greater than average POC population are identified in green.

To create Maps 3-5, staff first calculated the service area-wide average percent of each racial or ethnic classification (African American/Black, Asian American or Pacific Islander, and Latino/ Hispanic), as well as in each block group. This was done using data from the ACS 2011-2015 5YR Estimates. The block groups that have equal to or lower representation of the specific group than the system-wide average are not shaded. Shading of the block group increases according to the percentage of the concentration. The service area totals for each race/ethnicity are displayed below. For display, the percentages have been rounded to the closest whole number.
<table>
<thead>
<tr>
<th>Map</th>
<th>Ethnicity</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Map 3</td>
<td>African American/Black</td>
<td>14%</td>
</tr>
<tr>
<td>Map 4</td>
<td>Asian-American or Pacific Islander</td>
<td>27%</td>
</tr>
<tr>
<td>Map 5</td>
<td>Latino/Hispanic</td>
<td>26%</td>
</tr>
</tbody>
</table>

**INCOME**

Map 6 is similar to Maps 3-5, but instead of portraying the racial or ethnic makeup of the AC Transit service area, it shows the percentage of low-income residents for each census tract. “Low-income” is defined as a household income of less than 200% the federal poverty level. This is calculated with ACS 2011-2015 5YR Estimates data. The percentage of low-income residents in the service area is 30.24%. For display, this number has been rounded to 30% in the map.
14. Demographic Rider and Travel Survey Results

The Metropolitan Transportation Commission (MTC) has been conducting a coordinated effort to collect transit passenger data from all Bay Area transit properties as part of the region’s Transit Sustainability Project (TSP); AC Transit riders were surveyed in 2012 as part of that effort. Along with accurate trip information, the survey also included traditional demographics such as ethnicity and income, languages spoken, fare media use, and several attitudinal questions. The data collected from AC Transit riders were used to determine impacts associated with the most recent fare equity analysis conducted in November 2013 (for a fare change implemented in July 2014). The full results of the survey are presented in full in Appendix H.

The survey employed a methodology that included a brief, two-minute onboard survey that was limited to origin and destination types and rider contact information. This was followed up by a telephone survey.

The goal of the survey was to collect a representative sample of five percent of all boardings for riders 16 or older. The sampling plan for weekday riders was established at 8,777 which was 5.5 percent of weekday riders. The actual number of weekday surveys completed was 9,512, or 6.0 percent of weekday riders. This included survey quotas by line, by direction, and by daypart (peak, mid-day, and night). Field surveying was conducted between September 13th and December 20th, 2012. Follow-up telephone surveying was between September 19th and December 20th. Final results for the surveying process included a total of 9,512 weekday and 519 weekend phone surveys, and 28,028 weekday and 1,731 weekend field surveys.

The key findings were:

- Over half of AC Transit riders (56%) complete their one-way trip riding one bus. Slightly more than a third (36%) make one transfer and less than a tenth (9%) require two or more transfers (which include BART, Muni, or other agencies).
- Cash, at 50 percent, is the most common form of fare payment, with passes only slightly lower at 47 percent. The 50 percent that use cash includes 31 percent that pay with bills and coins and 18 percent that use declining cash value on a Clipper (electronic fare media) card.
- The largest proportion (39%) of AC Transit riders indicate they are African American, followed by riders who identify themselves as White (24%) or Asian (13%). Four percent of riders identify themselves as more than one race. Twenty percent of riders identify themselves as Latino or Hispanic.
- The vast majority of riders (95%) access transit from home by walking, while the remaining five percent includes those who drive alone (2%), are dropped off (1%), carpool (1%), or bicycle (1%). The average access walk time is 6.0 minutes.
44% of riders use the bus to get to work, 22% to get to school, and 15% both work and go to school.

Nearly 1/3 of riders speak a language other than English at home.

Household incomes of riders reflect that the large majority (74%) would be considered low-income, meaning that their household income is below $50,000.

Approximately half of AC Transit trips are made by riders that are transit dependent, as indicated by 51 percent of riders saying they do not have a driver’s license. Further, 40 percent have no drivable vehicles in their household.

A majority of riders (61%) pay full adult fares with the largest discount groups being disabled riders (11%), EasyPass or Class Pass (11%), youth (9%), seniors (6%), and other discounts (1%).

It should be noted that because the on-board data is currently over 4 years old, no new decisions related to fare changes are being made until there is sufficient contemporary data to support the planning efforts and to enable fare equity analyses. A new survey is scheduled to be conducted in 2017 in order to comply with federal guidelines.
15. Monitoring Program

The FTA requires providers of public transportation that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population to monitor the performance of their transit system relative to their system-wide service standards and service policies (i.e., vehicle load, vehicle assignment, transit amenities, etc.) not less than every three years.

The guidelines lay out the following methodology:

- Identify routes as Minority or non-Minority transit routes based on methods defined in federal circular C4702.1B – a route that has at least one-third of its total revenue mileage in a Minority Census block group.
- Assess the performance of each Minority and non-Minority route for each of the transit provider’s service standards and service policies;
- Compare the transit service observed in the assessment to the transit provider’s established service policies and standards;
- For cases in which the observed service for any route exceeds or fails to meet the standard or policy, analyze why the discrepancies exist, and take steps to reduce the potential effects;
- Evaluate transit amenities policy to ensure amenities are being distributed throughout the transit system in an equitable manner;
- Develop a policy or procedure to determine whether disparate impacts exist on the basis of race, color, or national origin, and apply that policy or procedure to the results of the monitoring activities; and
- Submit the results of the monitoring program as well as documentation to verify the board’s awareness, consideration, and approval of the monitoring results to FTA every three years as part of the Title VI Program.

According to Board Policy 518 contained in Appendix B, staff assessed the performance of each route according to definitions in Board Policy 545, “Service Standards and Design Policy,” contained in Appendix F and methods described in the FTA Circular. Following are the results of that analysis. In addition to the triennial monitoring policy, following Board Policy 545, staff submit an annual route performance report to the Board, including consideration of Minority Routes as defined by the FTA.

Over the next several years, AC Transit will be implementing a new Automated Vehicle Location (AVL) system that will increase the availability and amount of operational data that can be analyzed relative to a number of operational metrics such as on-time performance and vehicle load.
Identification of Minority and Non-Minority Routes

According to the methodology outlined in the FTA guidance, a Minority transit route is a route that has at least one-third of its total revenue mileage in the Minority Census Block Group. For Transbay routes that operate “closed door” for a significant portion of their route, staff used the total length of all street segments from its first stop to last stop in the East Bay as the total revenue mileage. Following this process, staff found that 103 out of 155 total AC Transit routes are designated “Minority routes.” This list of routes provided the basis for the analyses that follow.

Transit Service Monitoring: Vehicle Load, Vehicle Headway, and On Time Performance

Average Load and Average Maximum Load

Over 3 years, two calculations of the differences between Minority and non-Minority groups for Average Load or Average Maximum Load returned a finding that surpass the District’s 15% threshold for a finding of Disparate Impact (Sunday Average Load and Average Maximum Load). However in both cases, the load on Minority routes is lower than the non-Minority routes’ load, so there is no adverse effect on protected populations. The differences between impacts on Minority and non-Minority populations have subsequently decreased to lower than threshold levels. Table 15-1 presents the Average Load analysis.

Table 15-1 Load

<table>
<thead>
<tr>
<th>WEEKDAY</th>
<th>Average Load</th>
<th>Average Max Load</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fall 2014</td>
<td>Fall 2015</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>10.11</td>
<td>10.03</td>
</tr>
<tr>
<td>Non-Minority Routes</td>
<td>11.38</td>
<td>10.29</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>1.27</td>
<td>0.27</td>
</tr>
<tr>
<td>Average of two groups</td>
<td>10.39</td>
<td>10.08</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>-12.24%</td>
<td>-2.67%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SATURDAY</th>
<th>Average Load</th>
<th>Average Max Load</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fall 2014</td>
<td>Fall 2015</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>9.31</td>
<td>8.52</td>
</tr>
<tr>
<td>Non-Minority Routes</td>
<td>9.94</td>
<td>8.92</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>0.64</td>
<td>0.39</td>
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<tr>
<td>Average of two groups</td>
<td>9.43</td>
<td>8.60</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>-6.76%</td>
<td>-4.56%</td>
</tr>
<tr>
<td>SUNDAY</td>
<td>Average Load</td>
<td>Average Max Load</td>
</tr>
<tr>
<td>----------------</td>
<td>--------------</td>
<td>------------------</td>
</tr>
<tr>
<td></td>
<td>Fall 2014</td>
<td>Fall 2015</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>7.79</td>
<td>5.56</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>0.14</td>
<td>4.80</td>
</tr>
<tr>
<td>Average of two groups</td>
<td>7.82</td>
<td>6.47</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>-1.78%</td>
<td>-74.20%</td>
</tr>
</tbody>
</table>

**Headway**

For the purpose of this data analysis, routes with only 2-5 trips per day were not included, and Headway measures were calculated on the lowest value if a range of values is shown.

Two findings below (for Weekday Average Peak and Average Off-Peak Headway) exceed the disparate impact threshold established to measure equity in service provision. Additional statistical tests were performed on these two findings that confirmed the group differences between Minority and non-Minority groups were statistically significant. According to the methodology mentioned above, staff analyzed why these discrepancies exist.

The data reflect changes made in the first round of AC Transit’s ACGo service improvement plan in June 2016, which included a significant change in service to lines serving East Oakland and San Leandro to facilitate construction of the future East Bay Bus Rapid Transit project. These initial changes eliminated Line 1R because the rapid bus would not be able to pass local buses in a constrained roadway during construction, and split Line 1 into three new lines: 1, 6, and 10. While lines 1 and 1R were formerly categorized as “Minority” using the FTA’s methodology, two of the new shorter lines—6 and 10—are now categorized as “non-Minority.” Together these lines are among the most frequent in the system; their separation and reclassification have led to a significant change – and a disparate impact finding – in the headway service standard calculation. Once the BRT is implemented, it is anticipated that the route would be again classified as “Minority” as it travels through the most densely populated Minority neighborhoods in the District.

Staff found that while this three-year monitoring window includes initial ACGo service changes, it does not include additional up-coming roll-outs of the ACGo program that focus on improvements to communities with Title VI-protected populations. The entire package of ACGo improvements was analyzed for Title VI impacts and yielded a positive result, and the District is confident the disparate impact findings will be reduced by changes made since June 2016 as well as those coming across the
next 6-12 months as ACGO is phased in. Consequently, no immediate changes to the route network are proposed to correct the disparate impact finding beyond what are envisioned with the continued phase in of the ACGO network. Table 15-2 presents the Headway Analysis.

Table 15-2 Headway Analysis

<table>
<thead>
<tr>
<th>WEEKDAY</th>
<th>Average Peak Headway</th>
<th>Average Off-Peak Headway</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fall 2014</td>
<td>Fall 2015</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>26.20</td>
<td>24.21</td>
</tr>
<tr>
<td>Non-Minority Routes</td>
<td>23.45</td>
<td>21.67</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>2.74</td>
<td>2.54</td>
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<tr>
<td>Average of two groups</td>
<td>25.50</td>
<td>23.57</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>10.76%</td>
<td>10.77%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SATURDAY</th>
<th>Average Headway</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor</td>
<td>Fall 2014</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>23.57</td>
</tr>
<tr>
<td>Non-Minority Routes</td>
<td>22.72</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>0.85</td>
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<tr>
<td>Average of two groups</td>
<td>23.41</td>
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<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>3.64%</td>
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</table>

<table>
<thead>
<tr>
<th>SUNDAY</th>
<th>Average Headway</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor</td>
<td>Fall 2014</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>31.92</td>
</tr>
<tr>
<td>Non-Minority Routes</td>
<td>29.34</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>2.58</td>
</tr>
<tr>
<td>Average of two groups</td>
<td>31.39</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>8.22%</td>
</tr>
</tbody>
</table>

On Time Performance

On time service is defined as service that is no greater than 5 minutes late or 1 minute early upon arrival at a timepoint. An examination of on time performance data over the three year period indicates no significant difference between Minority and non-Minority Routes. Table 15-3 presents the On-Time Performance Analysis.
Service Accessibility

Service Accessibility (or service availability) is evaluated in the AC Transit service area by two variables: the distance from the centroid of each Census Block Group in our service area to its nearest bus stop, and the daily trip count of that nearest bus stop. If, for a Census Block Group, the distance is less than or equal to one-quarter mile and the daily trip count of the nearest stop is at least 14 (equivalent to hourly service from 6 am to 8 pm), this would indicate that it has good service accessibility. Census Block Groups designated as Minority have over 78% good service accessibility on Weekdays, and over 67% on Saturdays and Sundays. In all service periods, communities of people of color have better service accessibility than non-protected populations. Table 15-4 presents the Service Availability Analysis.

Table 15-3 On Time Performance Analysis

<table>
<thead>
<tr>
<th>WEEKDAY</th>
<th>Average On Time Performance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fall 2014</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>66.00%</td>
</tr>
<tr>
<td>Non-Minority Routes</td>
<td>68.47%</td>
</tr>
<tr>
<td>All Routes</td>
<td>66.43%</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>2.48%</td>
</tr>
<tr>
<td>Average of two groups</td>
<td>67.24%</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>3.68%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SATURDAY</th>
<th>Average On Time Performance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fall 2014</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>63.54%</td>
</tr>
<tr>
<td>Non-Minority Routes</td>
<td>68.27%</td>
</tr>
<tr>
<td>All Routes</td>
<td>64.28%</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>4.73%</td>
</tr>
<tr>
<td>Average of two groups</td>
<td>65.90%</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>7.17%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SUNDAY</th>
<th>Average On Time Performance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Fall 2014</td>
</tr>
<tr>
<td>Minority Routes</td>
<td>68.67%</td>
</tr>
<tr>
<td>Non-Minority Routes</td>
<td>70.92%</td>
</tr>
<tr>
<td>All Routes</td>
<td>69.03%</td>
</tr>
<tr>
<td>Absolute diff between two groups</td>
<td>2.25%</td>
</tr>
<tr>
<td>Average of two groups</td>
<td>69.79%</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
<td>3.23%</td>
</tr>
</tbody>
</table>
Table 15-4 Percentage of Census Block Groups with Good Service Accessibility

<table>
<thead>
<tr>
<th>Service Types</th>
<th>Weekday</th>
<th>Saturday</th>
<th>Sunday</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Census Block Groups in the Service Area</td>
<td>72.21%</td>
<td>60.97%</td>
<td>60.97%</td>
</tr>
<tr>
<td>Minority Census Block Groups</td>
<td>78.42%</td>
<td>67.37%</td>
<td>67.37%</td>
</tr>
<tr>
<td>Non-Minority Census Block Groups</td>
<td>65.22%</td>
<td>53.75%</td>
<td>53.75%</td>
</tr>
</tbody>
</table>

**Vehicle Assignment**

Throughout the service area, vehicle assignment is generally based on consideration of capacity, ridership, and loads. AC Transit is committed to ensuring vehicle assignment is equitable for all riders by evaluating whether the likelihood of crush loads (or standees) is distributed in a non-discriminatory fashion. Should standees occur at higher incidence on FTA-designated Minority lines, the District will strive to ensure capacity is improved on those lines through larger rolling stock or more frequent service. Although vehicle assignments are typically made on the basis of capacity, the Title VI Program update provides an opportunity to also investigate whether older and newer buses are distributed equitably.

In this analysis, this was measured by compiling and analyzing the average age of vehicles as they have been actually assigned over the last three years. While this information has been consistently recorded by the District’s automated vehicle location (AVL) system over this time, there are a few missing data points, particularly for routes that have been part of a service change. The designation of Minority and non-Minority routes is based on Fall 2016 data; newer routes have not been included in this analysis, nor have a few routes that are no longer in service.

Table 15-5 presents the results of the data analysis that show that while the average age of buses overall has grown in the past three years, the average age of buses assigned to Minority routes is consistently lower than those assigned to non-Minority routes. In no years did the difference between Minority and non-Minority represent a discriminatory effect.

Table 15-5: Average Age by Vehicle Assignment

<table>
<thead>
<tr>
<th>Average Age of Assigned Vehicles in Years by Route</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date Range</td>
</tr>
<tr>
<td>Minority routes</td>
</tr>
<tr>
<td>Non-Minority routes</td>
</tr>
<tr>
<td>Absolute difference between two groups</td>
</tr>
<tr>
<td>Difference between Minority &amp; non-Minority</td>
</tr>
</tbody>
</table>
Distribution of Transit Amenities
AC Transit does not have any direct jurisdiction over the siting and installation of transit amenities. In some cases, locations are selected by other jurisdictions (for example, Park & Ride facilities' locations are determined by Caltrans) or owned entirely by other agencies. Nearly all bus shelters are currently provided under contract through a Joint Powers Agreement between AC Transit and a number of cities in the District. Shelters in the City of Alameda serve as an exception to this agreement, as Alameda owns and maintains its own bus shelters. Decisions about where to place shelters are made with input from the municipality, the shelter contractor (where applicable), and AC Transit, and are based on a variety of factors – including advertising revenue, feasibility, ridership, visibility and safety – but the District itself has no final say on where shelters and the amenities associated with them are placed.

Despite having little say over their placement, AC Transit performs an analysis of the distribution of the various types of transit amenities to show their distribution based on race/ethnicity. To determine the equity of the distribution of transit amenities, AC Transit compares the number of bus stops with transit amenities within one-quarter mile of the stop for Minority routes and for non-Minority routes. Because some sections of many routes overlap, some amenities are counted as accessible to both Minority and non-Minority route stops.

Table 15-6 below shows that 35.6% of all bus stops have at least one transit amenity within one-quarter mile of the stop. Over 38% of Minority route bus stops have at least one transit amenity within one-quarter mile compared to 31.5% of non-Minority route bus stops. Stops on lines that serve primarily people of color have more amenities than the District average, while stops on lines that are not majority-people of color have fewer amenities than the District average.

Table 15-6: Transit Amenities for Minority and Non-Minority Tracts

<table>
<thead>
<tr>
<th></th>
<th>Minority route</th>
<th>Non-Minority route</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of stops</td>
<td>8,101</td>
<td>3,658</td>
<td>11,759</td>
</tr>
<tr>
<td>Shelters or Kiosks</td>
<td>521</td>
<td>259</td>
<td>556</td>
</tr>
<tr>
<td>Real Time Arrival (NextBus) Signs</td>
<td>108</td>
<td>71</td>
<td>113</td>
</tr>
<tr>
<td>BART Stations</td>
<td>19</td>
<td>6</td>
<td>20</td>
</tr>
<tr>
<td>Park &amp; Ride Lots</td>
<td>12</td>
<td>6</td>
<td>20</td>
</tr>
<tr>
<td>Ferry Terminals</td>
<td>3</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td>Percentage of bus stops with any amenity within 1/4 mile</td>
<td>38.1%</td>
<td>31.5%</td>
<td>35.6%</td>
</tr>
</tbody>
</table>

The map in Figure 15-1 shows the location of many amenities available to AC Transit passengers, including Park & Ride facilities, ferry terminals, commuter rail (BART) stations, bus shelters and kiosks,
and real time arrival (NextBus) signs. Amenity locations are shown in comparison to census block groups that have populations of people of color either above or at/below the service area average (71%).

**Figure 15-1: Transit Amenities Map**
16. Major Service Change Policy, Disproportionate Burden Policy, and Disparate Impact Policy

Board Policy 518 includes the Major Service Change Policy, Disproportionate Burden Policy and the Disparate Impact Policy. Board Policy 110 includes the definition of changes that qualify as “major” service changes. Both policies were adopted by the Board of Directors on August 13, 2014 to accommodate the Title VI requirements.

Appendix B provides Board Policy 518, and Appendix I provides Board Policy 110. Policies were renumbered over the last several years, but the Title VI content has remained the same.

The following reflects the text included in Board Policy 518 for the Major Service Change Policy, the Disparate Impact Policy, and the Disproportionate Burden Policy:

**TITLE VI SERVICE EQUITY ANALYSIS**

The District will conduct a Title VI service equity analysis whenever there is a major service change, as defined below. The District will also conduct a service equity analysis for changes which, when considered cumulatively over a three year period, meet the major service change threshold. In addition, the Board may request additional service equity analyses for the consideration of changes as it deems appropriate. For major service changes, the Title VI service equity analysis will assess the quantity and quality of service provided and populations affected.

**MAJOR SERVICE CHANGE POLICY**

A Title VI analysis shall occur whenever there is a significant change to service provision. Service changes covered by this policy are those indicated as “Major Adjustments of Transit Service” under Board Policy 110 (“Public Hearings Processes for the Board of Directors”). A major service change is generally one that constitutes a significant aggregate change in route miles or hours, and could include system wide route restructuring, changes in frequency, or adding and deleting service. For such major service changes, the Title VI service equity analysis will assess the quantity and quality of service provided and populations affected.

One exception listed in Policy 110 – restoration of service which had been eliminated due to budget constraints – is not a permissible exception for Title VI purposes. Staff will continue to conduct service equity analyses for restoration of services, if such proposed change otherwise fits the definition of a major service change.

**DISPARATE IMPACT POLICY**

As defined by the FTA Circular:
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[...] The policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations.

The measure of disparate impact involves a comparison of impacts borne by minority populations compared to impacts borne by non-minority populations. For a major service equity analysis, the District will measure service in terms of current AC Transit standards for frequency, span of service, and/or distance to bus routes. Title VI equity analyses will compare existing service or fares to proposed changes, and calculate the absolute change as well as the percent change. When minority populations or riders as a whole will experience a 15% (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. An adverse effect is defined as a geographical or time-based reduction in service which includes but is not limited to: elimination of a route, short turning a route, rerouting an existing route, or an increase in headways.

DISPROPORIONATE BURDEN POLICY

As defined by the FTA Circular:

Disproportionate burden refers to a facially 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 where practicable.

Low-income populations are not a protected class under Title VI. However, recognizing the inherent overlap of environmental justice principles in this area, and because it is important to evaluate the impacts of service and fare changes on passengers who are transit-dependent, FTA requires transit providers to evaluate proposed service and fare changes to determine whether low-income populations will bear a disproportionate burden of the changes.

AC Transit will conduct Title VI equity analyses by comparing existing service or fares to proposed changes, and calculating the absolute change as well as the percent change. When the proportion of low-income populations or riders as a whole adversely affected by the proposals is 15% (or more) than the proportion of non-low-income populations or riders adversely affected, such changes will be considered to have a disproportionate burden.

The following reflects the text included in Board Policy 110 for Major Adjustments of Transit Service:

MAJOR ADJUSTMENTS OF TRANSIT SERVICE include:
(a) A new transit route; or

(b) New service on streets (excluding major arterial streets and streets designated as a truck route) not previously used by any route; or

(c) Any aggregate change of 10 percent or more of the number of transit revenue miles or hours system-wide; or

(d) Any aggregate change of 20 percent or more of the number of transit revenue miles or hours in one of the 4 planning areas of the District (West Contra Costa County, North Alameda County, Central Alameda County, South Alameda County); or

(e) Any aggregate change of 25 percent or more of the number of transit revenue vehicle hours or miles of a route computed on a daily basis for the day of the week for which the change is proposed.

(f) EXCEPTIONS: Exceptions to the major adjustments of transit service include:

- A reassignment of route numbers resulting from combining existing routes, which results in the creation of a new route "number"

- Standard seasonal variations, unless the variation, as compared to operations during the previous season, falls within the definitions of major adjustments of transit service listed above

- Emergency service changes, including changes in routes or service frequencies which may be necessitated due to a disaster which severely impairs public health or safety, changes in access to public streets, or the ability of District equipment to travel on public streets. Emergency service changes may be implemented immediately without a public hearing provided that a finding identifying the circumstances under which the change is being taken is made by the General Manager and a subsequent public hearing is held if the change is to remain in effect longer than 180 days

- The restoration of service which had been eliminated within the past ten years due to budget constraints, provided the service runs on the same route as it had prior to its elimination, subject to minor deviations which do not exceed the major adjustment of transit service requirements above

- The introduction or discontinuance of short-term or temporary service which will be/has been in effect for less than twelve months

- Changes to service on a route with fewer than ten total trips in a typical service day

- Discontinuance of District-operated service that is replaced by a different mode or operator, providing a service with the same or better headways, fare, transfer options, span of service, and stops served
17. Public Engagement Process for Title VI Policies

On August 13, 2014 the AC Transit Board adopted revisions to Board policies that were required for compliance with Title VI (Civil Rights Act) and FTA Regulations. This included updating Board Policy 518 (numbered 551 in 2014 and presented in Appendix B) that includes the District's Title VI complaint and Major Service Change policies, established Disparate impact and Disproportionate Burden policies, and established a Title VI transit service monitoring program.

As part of the public engagement process leading up to the public hearing for these policies, staff made presentations at over 25 community events and included a number of traditional and non-traditional methods of soliciting input on this important topic, including the use of social media, notices in English, Spanish, Chinese, and Korean newspapers, press releases, and using Community Based Organizations and schools to publicize the hearing the subject matter.

No comments were received during the outreach that suggested alternatives to the definitions or thresholds in the proposed policies. However, most of the comments generally addressed broad concerns about civil rights and environmental justice that were reflected in the policies.

At a Public Hearing on June 11, 2014, members of the public presented several alternative recommendations for policy revisions, and staff were directed to analyze and provide feedback about those recommendations and other questions posed by the Board. As a result, Staff returned to the Board on August 13, 2014 with their results and a recommendation that the Board select the DI and DB thresholds from a proposed range, along with a recommendation to continue incorporating statistical methods into all Title VI Service and Fare Equity Analyses. The Board of Directors elected to approve a 15% threshold for Disparate Impact and Disproportionate Burden, and approved all amendments to Board Policies 163 (now Policy 110) and 551 (now Policy 518).

Appendix J provides the staff reports for the June 11, 2014 and the August 13, 2014 Board meetings where the policies were discussed and the policy was adopted.

The following outreach activities were included in this policy development process and are also referenced in the Staff reports contained in Appendix J.
<table>
<thead>
<tr>
<th>Community Meetings</th>
<th>Dates</th>
<th>Event Description</th>
<th>Attendance</th>
<th>Comment Cards Rec’d</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>5/29/2014</td>
<td>AC Transit Community Meeting: Fremont</td>
<td>8</td>
<td>4</td>
</tr>
<tr>
<td>2</td>
<td>5/31/2014</td>
<td>AC Transit Community Meeting: Oakland</td>
<td>23</td>
<td>9</td>
</tr>
<tr>
<td>3</td>
<td>6/4/2014</td>
<td>AC Transit Community Meeting: Hayward</td>
<td>10</td>
<td>5</td>
</tr>
<tr>
<td>4</td>
<td>6/5/2014</td>
<td>AC Transit Community Meeting: San Pablo</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>5</td>
<td>4/28/2014</td>
<td>Presentation: Oakland Sustainable Neighborhoods Initiative, Transportation Working Group</td>
<td>7</td>
<td>0</td>
</tr>
<tr>
<td>6</td>
<td>5/7/2014</td>
<td>Announcement/Material Distribution: Alameda County Central Committee Meeting</td>
<td>70</td>
<td>0</td>
</tr>
<tr>
<td>7</td>
<td>5/8/2014</td>
<td>Announcement/Material Distribution: Oakland Community Organizations, Citywide leadership meeting</td>
<td>17</td>
<td>0</td>
</tr>
<tr>
<td>8</td>
<td>5/8/2014</td>
<td>Announcement/Material Distribution: Emeryville, Berkeley, Oakland Transit Study (EBOTS) Meeting</td>
<td>12</td>
<td>0</td>
</tr>
<tr>
<td>9</td>
<td>5/12/2014</td>
<td>Announcement/Material Distribution: Richmond Neighborhood Councils Meeting</td>
<td>40</td>
<td>0</td>
</tr>
<tr>
<td>10</td>
<td>5/13/2014</td>
<td>Presentation/Material Distribution: Richmond Senior Center (English/Spanish)</td>
<td>40</td>
<td>7</td>
</tr>
<tr>
<td>11</td>
<td>5/13/2014</td>
<td>Announcement/Material Distribution: TEP Meeting with Genesis, Alameda Labor Council, ACTC</td>
<td>30</td>
<td>0</td>
</tr>
<tr>
<td>12</td>
<td>5/13/2014</td>
<td>Presentation: ACCE - Riders for Transit Justice</td>
<td>7</td>
<td>1</td>
</tr>
<tr>
<td>13</td>
<td>5/14/2014</td>
<td>Richmond 32nd Annual Senior Health Fair, Richmond Auditorium</td>
<td>200 (50 individual interactions)</td>
<td>0</td>
</tr>
<tr>
<td>14</td>
<td>5/15/2014</td>
<td>Presentation: East Oakland Neighborhood Crime Prevention Council @ 81st Ave Library (English with Spanish Translation)</td>
<td>17</td>
<td>3</td>
</tr>
<tr>
<td>15</td>
<td>5/18/2014</td>
<td>Announcement/Material Distribution: Immigration Forum - St. Anthony’s Parish (Spanish)</td>
<td>100</td>
<td>0</td>
</tr>
<tr>
<td>16</td>
<td>5/19/2014</td>
<td>Presentation: Street Level Health Project (2 Spanish presentations)</td>
<td>45</td>
<td>0</td>
</tr>
<tr>
<td>17</td>
<td>5/19/2014</td>
<td>Presentation: Elmhurst District Community District Board</td>
<td>12</td>
<td>1</td>
</tr>
<tr>
<td>18</td>
<td>5/21/2014</td>
<td>Presentation: East Oakland Neighborhood Crime Prevention Council @ Eastmont Substation</td>
<td>15</td>
<td>1</td>
</tr>
<tr>
<td>19</td>
<td>5/21/2014</td>
<td>Presentation: Fruitvale Unity (English/Spanish)</td>
<td>24</td>
<td>5</td>
</tr>
<tr>
<td>20</td>
<td>5/22/2014</td>
<td>Presentation: East Oakland Neighborhood Crime Prevention Council @ St. Bernard’s Parish</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>21</td>
<td>6/2/2014</td>
<td>Presentation: Youth Uprising</td>
<td>50</td>
<td>0</td>
</tr>
<tr>
<td>Community Meetings</td>
<td>Dates</td>
<td>Attendance</td>
<td>Comment Cards Rec'd</td>
<td></td>
</tr>
<tr>
<td>--------------------</td>
<td>-------------</td>
<td>------------</td>
<td>---------------------</td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>6/3/2014</td>
<td>Presentation: RYSE Youth Center, Richmond</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>23</td>
<td>6/5/2014</td>
<td>Presentation/Material Distribution: North Berkeley Senior Center</td>
<td>75</td>
<td>0</td>
</tr>
<tr>
<td>24</td>
<td>6/6/2014</td>
<td>Presentation: Centro Legal De La Raza</td>
<td>10</td>
<td>0</td>
</tr>
<tr>
<td>25</td>
<td>6/6/2014</td>
<td>Material Distribution: Four Seasons of Health Expo, Fremont</td>
<td>8</td>
<td>0</td>
</tr>
<tr>
<td>26</td>
<td>6/10/2014</td>
<td>Material Distribution: Mastik Senior Center, Alameda</td>
<td>25</td>
<td>0</td>
</tr>
<tr>
<td>TOTALS</td>
<td></td>
<td></td>
<td></td>
<td>708</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Supplemental Outreach</th>
<th>Dates</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>4/29/14 - 6/6/14</td>
<td>Direct outreach via phone and/or email to 160 organizations (transportation advocacy, civil rights organizations, environmental justice organizations, business organizations and various non-profit organizations) all of whom were invited to the 4 community meetings, the public hearing and were offered the opportunity to have AC Transit staff make a presentation to their staff and/or members - those that requested a presentation are the organizations listed above. Mailed packets of brochures and postcards to those that made requests for additional materials.</td>
</tr>
<tr>
<td></td>
<td>5/13/14-5/15/14</td>
<td>Mailed packets of brochures and postcards to 320 community locations including libraries, senior centers, non-profits and other community based organizations</td>
</tr>
<tr>
<td>General Manager's Newsletter</td>
<td>5/27/2014</td>
<td>Meeting dates and article included in May edition of On The Move</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Printed Materials</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Multilingual Brochure in English, Spanish, Chinese (On-board)</td>
<td>60,000</td>
</tr>
<tr>
<td>Multilingual Postcard in English, Spanish, Chinese</td>
<td>10,000</td>
</tr>
<tr>
<td>Multilingual Ad Card in English, Spanish, Chinese (On-board)</td>
<td>217</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td>Set Up Public Hearings/Title VI Page on actransit.com with links to the staff report in English, Spanish, Chinese, Tagalog, Korean, and Vietnamese</td>
</tr>
<tr>
<td>Web article on actransit.org</td>
</tr>
<tr>
<td>Staff report in English, Spanish, Chinese, Tagalog, Korean, and Vietnamese posted on the “In-Translation” page of <a href="http://www.actransit.org">www.actransit.org</a></td>
</tr>
</tbody>
</table>
18. Prior Service and Fare Equity Analyses

Since the last program update, no fare changes were proposed and no fare equity analyses were conducted. Five planning activities were significant enough to require public hearings, as required by FTA guidance and AC Transit Board Policy 518. All of them involved expansion of service, not reductions.

The following Equity Analyses were completed within the time horizon of this Title VI Program Update and are included in Appendix K of this update along with the supporting Staff Reports that indicate Board consideration:

- September 2015 Title VI Evaluation of Changes to Late Night Service
- September 2015: Title VI Evaluation of Continuation of Service Pilot (Line 46L)
- January 2015: Title VI Evaluation of Spring Service Improvements
- March 2016: Title VI Evaluation of Service Expansion Plan
- March 2016: Title VI Evaluation of Changes to lines 667, 668, and 675
Appendix A: Notice to Beneficiaries and Title VI Complaint Forms

The attached Civil Rights Notice to Beneficiaries and complaint form contained in the AC Transit Title VI Program is provided in English and available in all Safe Harbor Languages. They are also available on the following AC Transit website: http://www.actransit.org/ac-transits-commitment-to-civil-rights/ and as depicted below:

AC Transit’s Commitment to Civil Rights

- Title VI
- en español, Título VI
- 在中文: 第六章
- Language Assistance/Asistencia en su idioma: 語言協助
- Americans with Disabilities Act (ADA): Reasonable Modification
- Ley sobre Estandares de Deseos para personas con Discapacidades (Americans with Disabilities Act, ADA): Modificación razonable
- 《美國殘疾人法案》(ADA): 合理修正

Title VI

<table>
<thead>
<tr>
<th>Complaint Form</th>
<th>報狀六lingね言語</th>
<th>Formulario de queja del Título VI</th>
</tr>
</thead>
<tbody>
<tr>
<td>مذكرة اتهام</td>
<td>مذكرة اتهام</td>
<td>مذكرة اتهام</td>
</tr>
<tr>
<td>Formulario de reclamación</td>
<td>Formato de reclamación</td>
<td>Formulario de reclamación</td>
</tr>
<tr>
<td>Formulirio de plante</td>
<td>申述書</td>
<td>Formulirio de plante</td>
</tr>
<tr>
<td>投訴書</td>
<td>投訴書</td>
<td>投訴書</td>
</tr>
<tr>
<td>Formulirio de plante</td>
<td>申述書</td>
<td>申述書</td>
</tr>
</tbody>
</table>

AC Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color, or national origin as protected by Title VI of the Civil Rights Act.

If you believe you have been subjected to discrimination under Title VI, you may file a written complaint. Please complete the online complaint form or download a printable complaint form and mail it to us at the address below.

For more information on AC Transit’s civil rights programs and the procedures to file a complaint, please contact us:

- (510) 891-5470
- TDD/TTY 711
- AC Transit Customer Relations
  1600 Franklin St, Oakland CA 94612
Appendix B: Board Policy 518

Board Policy 518, “Title VI and Environmental Justice Service Review and Compliance Report Policy,” was adopted in 2004 and amended by the Board of Directors on August 13, 2014. It is incorporated in the Title VI Program by reference, and is available on the following AC Transit website: http://www.actransit.org/about-us/board-of-directors/board-policies/
AC Transit
2017 Public Participation Plan
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EXECUTIVE SUMMARY

In order to carry out its mission of connecting communities with safe, reliable, and sustainable service to its fullest potential, the Alameda-Contra Costa Transit District (AC Transit) is committed to engaging all members of the community – informing riders, residents, and businesses about changes in service or fares, and providing opportunities to participate in meaningful decision-making about plans and projects that may affect their lives or livelihoods.

Public engagement efforts at AC Transit recognize the diversity in the District’s service area and among riders. This Public Participation Plan (PPP) was created to identify effective methods of engaging with communities regardless of race, color, national origin, ability to speak English, or income status, as protected by Title VI of the Civil Rights Act and associated regulations. In addition, the District strives to reach people who may have been traditionally underserved or who are protected by other civil rights legislation and regulations, including on the basis of sex, disability, age, citizenship or legal status, religion, sexual orientation, gender identity, and military or veteran status.

The plan aims to encourage partnerships with these diverse communities, ensuring that their concerns are heard and their contributions are included along with those of the greater population. The plan provides an assessment of how well we are doing toward that goal along with a recent history of public engagement activities carried out by AC Transit.

The PPP is designed to be a living document that will be updated regularly to incorporate new data, technology, and methods, as identified through specific activities and experiences in the field. AC Transit will continue to work with community partners to identify and implement strategies that remove barriers to access and participation for all community members.
I. OVERVIEW

AC Transit provides fixed route bus service to approximately 1.6 million people in 13 cities and adjacent unincorporated areas in Alameda and Contra Costa counties within the greater East Bay area. This population is very diverse: according to 2015 population estimates, approximately 71% of the population is people of color, with Asian or Pacific Islander (27%), Latino/Hispanic (26%) and African American/Black (14%) making up the largest groups. A large number of residents speak languages other than English and many of them (20%) have limited English proficiency (LEP). Income diversity is also a critical piece in understanding the community, as more than 30% of the population has low or very low household income. A large number of area residents are transit dependent; they do not have a driver’s license or access to a car. The service area is also home to businesses and employers, a strong percentage of which are Asian, Latino, and African-American owned. Because of this broad diversity in the District, it is crucial that engagement with stakeholders includes a wide array of inclusive and representative methods.

As clarified in the Federal Transit Administration (FTA) circular 4702.1B, Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Further, Executive Order 12898 and FTA circular 4703.1 provide that environmental justice for low income populations should be part of the mission of federally funded programs. Under these mandates, transit operators must take reasonable steps to ensure all persons have access to participate in their activities and programs. Additionally, under Executive Order 13166, public engagement activities must be made accessible to persons who have limited English proficiency. Specific recommendations for providing language assistance are contained in the AC Transit Language Assistance Plan section of this Title VI program update.

A. PURPOSE OF THE PUBLIC PARTICIPATION PLAN

This PPP formalizes the public engagement policies of AC Transit to ensure adequate representation from the general public, riders, and other stakeholders while soliciting input for AC Transit’s service design, policies, and operations. The PPP is a living document that considers past outreach practices as well as new or innovative efforts to increase community engagement.

Since its inception, AC Transit has actively sought to include the knowledge, experience, and needs of the people living in the District by actively soliciting and incorporating such input in its decision-making process.

The PPP is guided by the following principles:

- That the District’s decisions consider the interests and concerns of affected people and entities;
That the public engagement techniques and activities are relevant in terms of timeliness, communities reached, and issues examined;
That the full range of opportunities for participation is made known and communicated broadly throughout the District; and
That community input received through public engagement processes is considered and incorporated to the extent possible.

These principles form the basis of the District’s public engagement policies and procedures. The Plan identifies existing outreach and public engagement methods that are used to solicit input and provide information about AC Transit’s programs and services. It also identifies additional ways in which the District can enhance its efforts to engage traditionally underrepresented and/or underserved groups in order to achieve more inclusive transit planning. It documents how it intends to proceed in the future to ensure continued success in working with and for the community.

B. SUMMARY OF PLAN DEVELOPMENT
The PPP considered input from agency staff to gain an understanding of how public engagement occurs within the AC Transit service area and how public comment is incorporated into planning processes. This consideration included methods that the AC Transit Board of Directors uses to conduct board meetings, public hearings, and advisory committee meetings, along with how recruitment to those committees is conducted.

The PPP considered the past engagement efforts with community forums and advisory groups to identify engagement methods that have been successful in the past. Work with community based organizations, chambers of commerce, other community or neighborhood groups, and local governments, as well as employers and other local agencies, helped inform the plan due to these stakeholders' intimate relationships with the community and understanding of local concerns. The groups the District has worked with since the last Title VI Program Update are listed in Appendix B.

This plan development also included an attempt to integrate the needs of those who may not be proficient in English or for whom the inability to speak English very well may be a barrier to participation. In addition, the AC Transit Language Assistance Plan spells out efforts to reach persons with Limited English Proficiency (LEP) and documents recommended methods of providing translation and interpretation services to people with LEP.

C. SERVICE DISTRICT PROFILE
AC Transit community and rider demographics and characteristics were viewed to establish a context for the outreach and engagement techniques to be considered. Large scale demographic
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C. SERVICE DISTRICT PROFILE

AC Transit community and rider demographics and characteristics were viewed to establish a context for the outreach and engagement techniques to be considered. Large scale demographic
data may mask pockets of diversity that should also be considered. A full description of the needs of individuals with LEP is included in the AC Transit Language Assistance Plan.

Race and Ethnicity in the Community

The AC Transit service area is a diverse district with people of color making up 71% of the population. Table 1 provides a racial and ethnic breakdown of the service area population.

Table 1: Service District Race and Ethnicity

<table>
<thead>
<tr>
<th>Total People of Color</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>People of Color</td>
<td>71%</td>
</tr>
<tr>
<td>White, not Latino/Hispanic</td>
<td>29%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Latino/Hispanic</td>
<td>26%</td>
</tr>
<tr>
<td>Not Latino/Hispanic</td>
<td>74%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Race</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>White, not Latino/Hispanic</td>
<td>29%</td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>27%</td>
</tr>
<tr>
<td>African American/Black</td>
<td>14%</td>
</tr>
<tr>
<td>Other race alone</td>
<td>24%</td>
</tr>
<tr>
<td>More than one race</td>
<td>6%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Included in “Other race alone”</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Latino/Hispanic white</td>
<td>13%</td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td>1%</td>
</tr>
<tr>
<td>American Indian or Alaska Native</td>
<td>1%</td>
</tr>
<tr>
<td>Other alone (Census category)</td>
<td>10%</td>
</tr>
</tbody>
</table>

Source: ACS 5YR Estimates, 2011-2015, Table B03002

Race and Ethnicity among Riders

The AC Transit ridership is also diverse. Data about riders are based on onboard surveys, which are conducted every five years. The survey conducted in 2012 found that the African American/Black rider population is more than double the service area residential average. The Asian or Pacific Islander rider population is about half of the service district average and the Latino/Hispanic and the white rider population are both very close to the service district average. Table 2 presents the race and ethnicity of the rider population. (Following the Census bureau method of asking whether or not a person is Latino/Hispanic separately from asking about race, Latino/Hispanic identification is listed separately from the racial percentages.) The next onboard survey will be conducted in 2017 and will inform implementation of this plan and the Title VI program in general.
Table 2: Ridership Race and Ethnicity

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Latino/Hispanic</td>
<td>20%</td>
</tr>
<tr>
<td>Not Latino/Hispanic</td>
<td>80%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Race</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>African American/Black</td>
<td>39%</td>
</tr>
<tr>
<td>White</td>
<td>24%</td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>13%</td>
</tr>
<tr>
<td>Other</td>
<td>19%</td>
</tr>
<tr>
<td>More than one race</td>
<td>4%</td>
</tr>
</tbody>
</table>

Source: 2012 Rider Survey

Languages within the Service District

Within the AC Transit service area, almost one in five people indicate they speak English less than very well. This is considered the population with limited English proficiency (or LEP). The following five languages are spoken by nearly 83% of those residents as self-identified in the American Community Survey¹:

- Spanish
- Chinese
- Tagalog
- Vietnamese
- Korean

There are an additional eleven languages that are each spoken by more than 1,000 residents with LEP within the service area; such languages are protected by the “safe harbor” provisions of federal regulations. Together LEP speakers of the 11 languages make up about 8% of the LEP population. (In all cases, languages or language categories are those provided as options in the U.S. Census.)

Spanish is spoken by the largest number of persons with LEP in the AC Transit service area (44%). Another 24% who speak English less than very well speak a Chinese dialect. Accordingly, vital documents and publicity and outreach materials should be routinely translated into Spanish and Chinese in order to increase access to AC Transit service and programs by non-English speaking populations.

Other languages should be considered based on the targeted nature of the outreach methods or the geographic scope of a project. For example, a large number of Vietnamese speakers who

¹ ACS 5YR Estimates, 2011-2015, Table B16001
have LEP live in the area adjacent to the Bus Rapid Transit (BRT) project currently under construction. While Vietnamese is spoken by only 5.5% of residents with LEP District-wide, it is spoken by more than 10% of residents with LEP in nearly one-quarter of the census tracts in the BRT corridor, and in one census tract in the corridor almost 26% of residents with LEP speak Vietnamese. Due to the high number of LEP Vietnamese speakers affected by this project, public engagement and information materials related to the BRT are typically translated into Spanish, Chinese, and Vietnamese. The AC Transit Language Assistance Plan describes populations with limited English proficiency and recommended actions in greater detail.

**Languages among Riders**

According to the 2012 Rider Survey, nearly one-third (32%) of riders speak a language other than English at home. More than seven in ten riders of Asian or Latino heritage indicate that they speak a language other than English at home. Spanish is spoken by the majority of riders who speak a language other than English at home, followed by Mandarin Chinese, Cantonese Chinese, and Tagalog. Table 3 presents the languages spoken at home as reported by the Rider Survey.

**Table 3: Languages Spoken at Home by AC Transit Riders**

<table>
<thead>
<tr>
<th>Languages Spoken at Home</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>68%</td>
</tr>
<tr>
<td>Spanish</td>
<td>17%</td>
</tr>
<tr>
<td>Mandarin</td>
<td>3%</td>
</tr>
<tr>
<td>Cantonese</td>
<td>2%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>2%</td>
</tr>
<tr>
<td>French</td>
<td>1%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>1%</td>
</tr>
<tr>
<td>Korean</td>
<td>1%</td>
</tr>
</tbody>
</table>

*Source: 2012 Rider Survey*

The 2012 Rider Survey did not ask the proficiency in English of people who said they spoke another language at home. However this information helps AC Transit identify needs in the community and additional useful methods of outreach and communication, such as ethnic media.

**Income and Economic Characteristics**

Table 4 presents information about household income in the AC Transit service area.
Household income alone, without knowing household size, is not sufficient to know if people are struggling economically. Federal guidelines require us to identify how many low income people are served by AC Transit by comparing household income and size to the federal poverty rate.

To adjust for the high cost of living in the Bay Area, regional governmental organizations have elected to use a definition of low income that equals 200% of the federal poverty rate. According to this definition, for example, in 2015 a couple earning less than approximately $32,000 and a family of four with income under $48,500 would qualify as low income; these incomes would still be significantly lower than the median household income in the area, estimated at over $75,000 in Alameda County and over $80,000 in Contra Costa County. Applying this definition, approximately 31% of the population living in the AC Transit service area qualifies as low income.

Table 5 presents the household income from the On-Board Rider survey conducted in 2012. Although the income categories in the two tables do not match entirely, it is clear that there is a greater preponderance of lower income households among AC Transit riders when compared to the general population. The difference is most striking in the lowest income category (less than $25,000), where the percentage of riders within that income category is more than three times the percentage of households in the service area population with income under $25,000.

Table 5: Ridership Household Incomes

<table>
<thead>
<tr>
<th>AC Transit Riders Household Income</th>
<th>Percentages</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than $25,000</td>
<td>49%</td>
</tr>
<tr>
<td>$25,000 to $34,999</td>
<td>15%</td>
</tr>
<tr>
<td>$35,000 to $49,999</td>
<td>10%</td>
</tr>
<tr>
<td>$50,000 to $74,999</td>
<td>11%</td>
</tr>
<tr>
<td>$75,000 or more</td>
<td>15%</td>
</tr>
</tbody>
</table>

Source: 2012 Rider Survey
Understanding the diverse business environment in the service area may be helpful in determining how best to engage the local workforce. Table 6 represents the designation of businesses owned by people of color in Alameda and Contra Costa counties.

Table 6: Designation of Alameda and Contra Costa County Firms by Race and Ethnicity

<table>
<thead>
<tr>
<th>Race and Ethnicity of Alameda and Contra Costa County Business Owners</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>African American/Black</td>
<td>8%</td>
</tr>
<tr>
<td>Chinese</td>
<td>10%</td>
</tr>
<tr>
<td>Latino/Hispanic</td>
<td>13%</td>
</tr>
<tr>
<td>Other Asian</td>
<td>14%</td>
</tr>
<tr>
<td>Other races/ethnicities</td>
<td>5%</td>
</tr>
<tr>
<td>Not owned by people of color</td>
<td>50%</td>
</tr>
</tbody>
</table>

Source: 2012 Survey of Business Owners, Table SB1200CSA01

Reaching out to chambers of commerce, such as the African American, the Hispanic, the Chinatown, or the Korean American Eastbay Chamber, for example, is an additional method of reaching the diverse population of the service area.

Traditionally Underserved Communities

The data reviewed indicated that residents with limited English proficiency (LEP) and lower income are at the greatest risk of being unaware of AC Transit’s services and programs. This information may be especially critical when seeking public input on issues associated with service or fare changes. For instance, residents who work non-traditional shifts (in jobs that are typically associated with lower wages) might have a harder time attending an outreach meeting on a workday evening, even though a service change proposal being discussed at such a meeting could considerably affect them. This example illustrates that AC Transit must consider specific and targeted techniques to engage underrepresented communities.

Such strategies may include, but are not limited to:

- Holding meetings in a variety of locations and times to ensure that access to the meetings will not present an unnecessary burden;
- Holding meetings in locations that are accessible to persons with disabilities, and are easily reachable by public transportation
- Considering a variety of types of meetings that might provide more flexibility for attendees, such as workshops, open houses, etc.
- Partnering with community based organizations, faith-based centers, civic institutions, elected officials, and/or neighborhood leaders to help publicize outreach activities
- Asking to be invited to meetings already scheduled in the community to reach audiences at times and locations that are convenient for them
• Ensuring that language assistance measures are geared toward encouraging full engagement in planning activities, such as providing translation of materials in advance and including on-site interpretation at meetings
• Dedicated telephone comment “Hotlines,” website information, and social media that can publicize outreach activities or provide information at all times and can be accessed in a variety of languages.

D. PUBLIC ENGAGEMENT STRATEGY

Acknowledging the diversity in the AC Transit service area and among riders is essential to developing public engagement strategy. Public engagement is not an information “one-way street” – it includes consultation with the community, reviewing input, and revising plans when possible. AC Transit intends to approach public engagement by asking a question – what is the issue that needs to be solved and what are your ideas for solving it? – instead of simply soliciting feedback for a pre-decided solution.

In order to reach the greatest number of people and ensure effective public participation and engagement within the service area, AC Transit staff will develop targeted approaches based on considerations such as stakeholders affected, general audience, and complexity of the issues involved. Staff will identify resources for public engagement early in the process, including staff availability and expertise, time and schedule, and budget dollars. Identifying needs for, acquiring, and providing translations and interpreters for people who don’t speak English very well will also be considered early in planning for engagement activities. This requires considering public engagement at the very beginning of processes, planning activities, grant applications, etc.

Staff are constantly reviewing and improving upon existing techniques. By matching the level and type of outreach to the issue at hand, AC Transit can use outreach dollars in a way that best meets the needs of our riders, our community, and the District; we can ensure mobility, access, and connectivity; and we can engender good will and enhance ongoing partnerships in the community.

The flowchart in Figure 1 presents the framework that staff use when considering public engagement. Using this process, each public engagement campaign is based upon the unique characteristics of the community and/or the audience that is affected by an issue. Stakeholders are consulted early and often throughout the campaign so that outreach activities can be adapted as necessary, input can be considered and incorporated when possible, and staff can “close the loop” – providing full information and enriching ongoing relationships with riders and community members.
Figure 1: Public Engagement Process

- Identify Issue
  - Convene Internal Stakeholders
    - Define Scope
    - Develop Broad List of Possible Options
    - Identify Regulatory/Legal Requirements
    - Discuss Possible Impacts (Who, What, When, Where, Why, How?)
  - Check In with External Stakeholders
  - Create Outreach Strategy
    - Goals & Objectives
    - Tools
    - Reflect Unique Community
    - Budget & Scope
    - Timeline
- Refine
- Implement Plan
- Receive Feedback
- Complete Public Engagement and Evaluate
Separately, staff are working on an internal handbook which will provide more specific tools to plan and carry out particular public engagement efforts. Together these tools provide a structure of necessary steps yet leave room for creativity, flexibility, and innovation throughout the engagement process.

Appendix C presents the outreach activities undertaken in the last three years.
II. Existing Outreach and Engagement Tools

AC Transit has a wide array of marketing and communications tools and strategies that staff may use to inform and engage the public in the planning and development phases of service and fare changes, studies, and activities. These tools have been developed over time with the goal of reaching diverse audiences across a variety of mediums when and where they are most receptive to the information. Information is developed in multiple languages with consideration of the cultural needs and sensitivities of all customers.

A. TRADITIONAL MEDIA

Traditional media is one means to reach a large audience through newspaper, radio and television. There are two ways to tap into these resources: paid advertising and unpaid editorial coverage.

Paid Advertising

Paid advertising provides a guaranteed line of communication to an identified audience with a message controlled by the District.

- Print display ads, classified ads, legal notices, front page strip ads, flyers, foldings, and inserts that are included with a newspaper.
- Radio spots, sponsorships, live remotes, and advertorials (paid placements designed to look like a news article, often presented under the byline of the general manager).
- Television spots.

Editorial Coverage

Editorial coverage includes stories written by a reporter where AC Transit gives up control of the message in exchange for journalistic authority. Media relations staff use appropriate tactics to encourage reporters to write accurate and balanced stories, generally in traditional media.

- Press release: a press release is issued to reporters who have asked to receive them or whose beats or interests match those of AC Transit. A press release can be used to introduce a new service or product, to explain a change or addition to service, or to highlight accomplishments.
- Media advisory: a media advisory is issued to share specific information with reporters. For example, a media advisory might invite reporters to a press conference or provide a statement about a specific topic.
- Editorial board meeting: the AC Transit general manager might be invited to talk to an editorial board about an important initiative or change in the organization. It provides the opportunity for the parties to talk in depth so that resulting coverage is accurate and balanced.
- Familiarization tour or visit: reporters may be invited to visit a location as part of their research of a story.
- Live shot: television and radio reporters will broadcast live from the location of an event or announcement.

B. DIGITAL COMMUNICATIONS
The Internet has had a significant impact on how AC Transit communicates directly with its riders and community. The ability to disseminate a specific, controlled message through a website or email message has changed how stakeholders are informed and engaged. It is also a constantly changing and evolving world, providing new tactics regularly.

- Website: actransit.org provides detailed information about current service, upcoming service changes, long- and short-term planning projects, Board of Directors agendas and staff reports, and other initiatives.
- Email messages: Riders are encouraged to subscribe to the eNews distribution list that corresponds with the service lines they use regularly. This tool is used to provide detour notices and service change information to riders in three languages.
- Social media: information can be shared with riders in real time using digital channels such as Twitter, Facebook, and Linkedin. Social media provide another avenue for customer service as well a way to drive people to the website for detailed information.
- Video tutorials: short video snippets are used to grab the attention of riders in the case of fare increases or service changes. These videos are distributed via social media with the goal of driving riders to the website for detailed information.

C. PRINTED MATERIALS
Printed pieces, or collateral, are created to support almost every marketing or communication effort the District undertakes. Information is presented in three languages with directions on how to access additional language support.

- Brochures: brochures generally include detailed information that helps a rider understand upcoming service changes, planning projects, rider resources and other topics. Brochures can be produced with multiple pages or they can be the size of a bookmark. Because of the variety of ways a brochure can look, they are sometime broadly referred to as “take ones.” They are distributed in holders on the bus and via direct mail to social service, local government, and stakeholder organizations.
- Signage: this includes signs or bags at bus stops, posters at shelters, car cards behind the operator’s seat inside the coach, pop-up signs attached to the fare boxes, ad cards that run along the interior of the bus, and interior and exterior bus ads.
- Flyers: for major initiatives, the district may choose to drop flyers on every seat in the fleet.
- Maps, schedules, and timetables: printed system maps, schedules at high-traffic locations, and timetables that include maps and schedule information are distributed through social service, local government, and stakeholder organizations as well as AC Transit customer service centers.
• Direct mail and door hangers: these tactics get information directly into the hands of riders, or potential riders, in their homes.

D. PUBLIC MEETINGS, WORKSHOPS, AND HEARINGS
In-person workshops and meetings serve a variety of roles, from fulfilling legal obligations in the case of public hearings, to fostering in-depth discussion and opportunities for input in the case of public workshops. These meetings function best when serving as venues for open discussion of proposals, challenges, and issues facing a particular community or set of stakeholders.

• Public meetings at various times and locations across the District to solicit community input, and to share information about projects, studies, and proposed changes.
• Board meetings held in locations outside the District’s downtown Oakland Board Room – in West Contra Costa County and Special District 2 in Southern Alameda – to foster greater interaction between the Board and the community.
• Public hearings in communities where projects or plans are under consideration. Notices for public hearings are based on Board Policy 110 (contained in Appendix A), which has strict guidelines to ensure that appropriate legal notification occurs. This includes placing notices within a specific timeline in newspapers or publications that serve non-English speaking populations with a goal of maximizing visibility and community participation.
• In-person meetings with stakeholders, community partners, elected officials, and other transportation partners.
• In-house presentations or joining existing meetings to reach community members where they are already gathered.
• Live webinars and telephone town halls, with opportunities for questions and comments, and recordings of webinars and Board Meetings that can be accessed at all times.
• Provide meetings at locations accessible for persons with disabilities, and close to public transportation for people who work non-traditional times.
• Provide interpreters and use District-owned interpretation equipment for non-English speaking people when warranted.

E. COMMUNITY ENGAGEMENT
Many other public, private, and non-profit organizations conduct activities related to the services provided by AC Transit. When and where possible, AC Transit works with these organizations to gather input, provide information, or raise awareness about District services.

• Partnerships with community based organizations (CBOs), local governments, social service agencies, and faith-based organizations, including organizations that serve non-English speaking populations.
• Field and respond to inquiries from community, government, and business leaders.
• Participation in community events, including fairs, festivals, and parades.
• Inclusion of bilingual staff when possible and appropriate.
• Outreach by staff and brand ambassadors, including use of digital technology when appropriate to provide information and access to services.
• Distribution of marketing materials (including translations) and meeting notices on buses and through CBOS, social service partners, and other public agencies.
• Advertise recruitment to membership on advisory boards and committees through relationships with community partners.

F. DEDICATED PROJECT OR PROGRAM CENTERS
AC Transit is involved in a number of large projects, including construction of a new Bus Rapid Transit line. For projects of this scope, the District may opt to open a dedicated space to improve access to information and service for the community.

• East Bay Bus Rapid Transit Information Center, centrally located in the BRT corridor, serves as a project resource center providing up-to-date information about the BRT project and construction activity. Staff, including Spanish-speaking staff, provide information in English, Spanish, Chinese, and Vietnamese, and use an over-the-phone interpretation system to communicate with individuals who speak a language other than English or Spanish.
• AC Transit Customer Service Center and Clipper Customer Service Center, including Spanish- and Chinese-speaking staff to provide assistance at in-person locations for residents to access information, buy transit passes, address concerns, and conduct Clipper Card transactions.

G. TELEPHONE INFORMATION AND COMMENT LINES
Many customers rely upon the telephone for trip planning, information about upcoming changes or projects, and to relay complaints and compliments.

• Use of dedicated telephone numbers to provide information and an opportunity for public to comment on relevant issues.
• Use of language-specific telephone lines.
• Over-the-phone interpretation services easily accessed by Customer Call Center and local District staff to provide immediate support in the customer's own language.

H. MARKET RESEARCH, SURVEYS
Surveys play a crucial role to collect data about riders, the service, and impacts of specific projects. They also can measure changes over time.

• Printed and online surveys of rider demographics and travel characteristics to comply with Title VI and Environmental Justice requirements, and to understand customer transit behavior.
• Surveys and focus groups to understand the needs of customers and the opinions of the community at large, including customer satisfaction.
• One-time, small sample, and project specific surveys, including pilot projects.
• Post-activity surveys to assess the activity and/or to assess the outreach conducted in advance of the activity.
• Surveys in various languages and in additional languages upon request.
III. RECOMMENDED STRATEGIES

Several key recommendations emerged during the refinement of this Public Participation Plan that can help to strengthen the consistency and continuity of the District’s community engagement efforts. Adopting these recommendations will help to ensure a robust public process that responds to civil rights and environmental justice considerations, while ensuring meaningful public involvement in AC Transit planning activities and decision-making processes.

A. DEVELOP PUBLIC ENGAGEMENT STRATEGIES THAT REFLECT THE COMMUNITY

When planning public outreach and involvement activities, staff should consider the unique characteristics and needs of the community, especially those of Title VI-protected populations and traditionally underserved communities. Each opportunity for public engagement should follow the process outlined in Figure 1 on page 11 as a guide to help identify stakeholders’ needs and the methods of outreach most likely to be effective. The goal of this approach is to provide information and opportunities to these communities in formats, locations, and times that maximize their participation.

B. BE FLEXIBLE AND CREATIVE WHEN PLANNING PUBLIC ENGAGEMENT

The PPP recommends a consistent, strategic approach to the community engagement process. At the same time, each situation demands its own approach and process. Staff should be encouraged to be creative when developing engagement plans, making use of new information, technology, and trends as they arise. Doing so will help to ensure more meaningful, inclusive, and effective public involvement.

C. CONTINUE INTEGRATING LANGUAGE ASSISTANCE MEASURES IN PUBLIC ENGAGEMENT ACTIVITIES

The Language Assistance Plan (LAP), contained separately in the Title VI Program, offers recommendations on how best to communicate with people with limited English proficiency (LEP). Using methods recommended by the Federal Transit Administration, staff identified languages spoken in the District, conducted an internal audit of existing outreach efforts, and received suggestions from Community Based Organizations (CBOs) to help enhance AC Transit’s communications with LEP residents. The District has made great strides incorporating LAP recommendations, and staff should continue incorporating these strategies and techniques in every outreach and public engagement activity.

D. ENCOURAGE OPINIONS AND INVOLVEMENT ACROSS A BROAD SPECTRUM

AC Transit welcomes all input received through the public engagement process and is committed to using that feedback to improve its community engagement efforts. The PPP recommends that
staff embrace the development of tools, such as community feedback forms, that allow them to evaluate the effectiveness of their engagement activities.

E. DEVELOP INTERNAL HANDBOOK TO STREAMLINE AND ENHANCE PUBLIC ENGAGEMENT EFFORTS

District staff have expressed their desire for a resource that integrates basic outreach guidance, protocols, and experiences from past projects, and which can serve as a reference for future public engagement efforts. Toward this end, an interdepartmental public engagement working group (PEWG), consisting of staff from seven departments, has formed to guide the development of an internal public engagement handbook. The envisioned handbook will define roles and responsibilities in the community engagement process; improve communication and internal coordination between departments; provide sample process flow charts, budgets, and public information collateral; establish methods for retaining and reusing draft materials, including narrative content and translations; and point to a repository for past and ongoing projects. The handbook will also provide examples of major activities requiring public engagement and recommended baseline activities. The handbook will provide clear and practical instructions for both experienced staff and those new to AC Transit.

IV. PERFORMANCE MONITORING

Given the District’s commitment to public involvement, outreach must focus on high quality public engagement rather than simply large and expensive efforts of public outreach. AC Transit will continue to work to provide the general public and targeted communities with the information and tools necessary to provide thoughtful and considered input. AC Transit will also strive to incorporate that input into decision-making, policy and plan development, and overall system performance whenever possible.

AC Transit will measure and report on its efforts to engage the public to participate in its decision-making processes, including:

- Maintaining records of meetings and input, particularly in low income and non-English speaking communities, when soliciting public comment
- Surveying community partners and other key stakeholders to get feedback about AC Transit’s engagement methods and processes
- Including the content and amount of the public comment received, and opportunities to incorporate such comment, in reports to the Board of Directors
- Examining the results of the outreach efforts to determine if the outreach was effective
- Comparing engagement efforts with best practices
- Adapting future efforts to enhance the ability of the public to participate in the AC Transit public engagement process
V. CONCLUSION

AC Transit is committed to a thorough and robust public engagement process that includes standard and collaborative public outreach techniques and creative targeted engagement activities while using resources effectively and efficiently. With the integration of measures identified in the Language Assistance Plan, AC Transit will codify baseline outreach practices to meet the needs of the customer, the general public, and the District, and allow for every opportunity for the public to become a full partner in decision-making.
Appendix A: Board Policy 110

Board Policy 110, Public Hearing Process for the Board of Directors, was last updated in February 2015. It can be accessed on the AC Transit public website: http://www.actransit.org/about-us/board-of-directors/board-policies/
Appendix B: Community Based Organizations and Groups

The following list includes the CBOs that AC Transit has contacted and/or partnered with between 2014 and 2017.

23rd St. Merchants Association
A Safe Place
AARP
Abode Svcs
AC Transit Accessibility Advisory Committee
Academy of Chinese Culture
Academy of Chinese Performing Arts
Adept Community Management
Adventist Homeless Action Team
Afghan & International Refugees Support Svcs
Afghan Coalition
Airport Area Business Assoc
Ala Costa Ctr
Alameda Alliance for Health
Alameda Chamber of Commerce
Alameda Co. Community Food Bank
Alameda Co. Family Justice Ctr
Alameda Co. Health Care Svcs Agency
Alameda Co. Public Health
Alameda Co. Public Health Asthma Start Program
Alameda Family Svcs
Alameda Hospital
Alameda Korean Presbyterian
Alameda Multi-Cultural Community Ctr
Alameda One Stop Career Ctr
Alameda Public Library
Albany Chamber of Commerce
Albany High School
Albany Public Library
Albany Senior Ctr
Albany Strollers and Rollers
All Nations Church of God in Christ
Allen Temple Baptist Church
Alliance of Californians for Community Empowerment
Alta Bates Summit Medical Ctr
Amalgamated Transit Union, Local 192
American Indian Model Schools
American Lung Assoc in California- East Bay
American Muslim Alliance
Amtrak Station Emeryville
Anchor Education, Inc.
AnewAmerica
Anna Yates Elementary School
Another Road to Safety (Prescott-Joseph)
Arc of Alameda County
Ashland Youth Ctr
Asian Community Mental Health Svcs
Asian Employees Association at the Port of Oakland (AEA)
Asian Immigrant Women Advocates
Asian Pacific Environmental Network
Asian Pacific Fund
Asian Week Foundation
Asians & Pacific Islanders with Disabilities
Associated Residents of Sequoyah Highlands, Inc.
At the Cross Roads
Atchison Village Neighborhood Council
Bancroft Senior Homes
Bauman College
Bay Area Cancer Partnership - California Health Collaborative
Bay Area Community Svcs
Bay Area Legal Aid
Bay Area Outreach & Recreation Program
Bay Area Rapid Transit
Bay Area Regional Health Inequities Initiative
Bay Area Telugu Assoc
Bay Area Urban Debate League
Bay Community Fellowship
Baywood Court Senior Residency
Belding Woods Neighborhood Council
Berkeley Adult School
Berkeley Art Museum
Berkeley Chamber of Commerce
Berkeley Chinese Community Church & Senior Ctr
Berkeley City College
Berkeley Daily Planet
Berkeley Food & Housing Project
Berkeley Gateway Shuttle
Berkeley PACE Ctr
Berkeley Public Library
Berkeley Transportation Commission
Berkeley Zen Ctr
Berkely Property Owners Assoc
Beth Eden Baptist Church of Oakland
Beth Israel Congregation
Bike Alameda
Bike East Bay
BOSS Multi Agency Service Ctr
Breathe California of the Bay Area
Brickyard Cove #1 Neighborhood Council
Brickyard Cove #2 Neighborhood Council
Brickyard Landing Homeowners' Assoc
Brickyard Landing Homeowners Neighborhood Council
Broadway-Manila Neighborhood Committee
Buddhist Temple of Alameda
Building Opportunities for Self-Sufficiency
CALICO Center
California Autism Foundation
California School for the Blind
California School for the Deaf
California State University East Bay
California Walks
Californians for Justice
Caltrans
Cambodian Community Development, Inc.
Cantonese Assoc of Oakland
Carriage Hills Neighborhood Council
Castro Heights Neighborhood Council
Castro Valley / Eden Area Chamber of Commerce
Castro Valley Public Library
Catholic Charities of the East Bay
Causa Justa: Just Cause

Center for Cities and Schools (Y-PLAN)
Center for Elders Independence
Center for Family Counseling
Center for Independent Living
Center for Lesbian & Gay Studies in Religion & Ministry
Center of Hope Church
Center St Missionary Baptist Church
Centerville Presbyterian Church
Centro de Servicios Corp.
Centro Legal de la Raza
Cerebral Palsy Center for the Bay Area
Chabad of the Tri-Valley
Chabot College
Chabot-Las Positas Community College District
Children's Hospital & Research Ctr - Oakland
Chinese American Citizens Alliance - Oakland Lodge
Chinese Community United Methodist Church
Chinese Independent Baptist Church
Chinese Presbyterian Church
Christ Episcopal Church
Christian Church Homes
Chrysalis
Church of Christ Emeryville
Church of Living God Faith
Church of Soul/Macedonia Baptist Church
Church of St Leo the Great
Citizens for Better Community
Citizens of Oakland Respond to Emergencies
City CarShare
City of Pinole
CityServe's Compassion Network
CityTeam Ministries
Civic Center Improvement Association
Civic Pride
Claremont Canyon Conservancy
Claremont Elmwood Neighborhood Association
Claremont Rockridge Neighborhood Association
College of Alameda
Communities for a Better Environment
Community Christian Ctr
Community Education Foundation for San Leandro
Community Housing Development Corp. of North Richmond
Community of Grace
Community Resources for Independent Living
Community Violence Solutions
Congregations Organizing for Renewal
Contra Costa Central Labor Council
Contra Costa College
Contra Costa Interfaith Supporting Communication Organization (CCISCO)
Coronado Neighborhood Council
Cortez/Stege Neighborhood Council
Crescent Park Family Resource Ctr
Crescent Park Neighborhood Council
Davis St Family Resource Ctr
Deaf Community Advocacy & Referral Agency
Deaf Community Ctr
Defremery Park Rec Ctr
Disabled American Veterans
DMV Neighbors Association
Downs Memorial United Methodist Church
Downtown Association
Downtown Berkeley Assoc
Downtown Oakland Assoc
Downtown Oakland PACE Ctr
Downtown Oakland Senior Ctr
Dublin Chamber of Commerce
East Bay Asian Local Development Corp
East Bay Asian Youth Ctr
East Bay Center for the Blind
East Bay Community Law Ctr
East Bay Community Recovery
East Bay Housing Organizations
East Bay Innovations Inc.
East Bay Korean-American Senior Svcs Ctr
East Bay Refugee Forum
East Bay Rental Housing Assoc
East Bay Resource Center for Non-Profit Support
East Bay Scraper Bikes
East Bay Vietnamese Alliance Church of Christian & Missionary
East Bay Vietnamese American Buddhist Assoc
East Lorin Neighborhood Association
East Oakland Boxing Assoc
East Oakland Recovery Ctr
East Oakland Senior Ctr
East Oakland Youth Development Ctr
East Side Arts Alliance
Eastbay Works
Eastshore Community Neighborhood Council
EBASE
Echo Housing
Ecole Bilingue
Ecology Center
Ed Roberts Campus
Eden Area One Stop Ctr - Hayward
Eden Area Regional Occupational Program
Eden Housing, Inc.
Eden Medical Center
EE Cleveland Manor Affordable Senior Housing
El Cerrito Public Library
El Sobrante Hills Neighborhood Council
El Sobrante Public Library
Emery-Go-Round
Emeryville Chamber of Commerce
Emeryville Citizens Assistance Program (ECAP)
Emeryville Property Owners Assoc
Emeryville Rec Ctr
Emeryville Senior Ctr
Ephesian Baptist Church
Episcopal Church of the Good Shepherd
Epworth United Methodist Church
Equal Justice Society
Ernie Raimondi Park
Escuela Bilingue
E'ville Eye
Fairmede Hilltop Neighborhood Council
Fairview Park Neighbors Association
Fairway Park Baptist Church
Familias Unidas
Family Bridges, Inc.
Family Paths
Family Service Counseling Center
Family Violence Law Center
Farrelly Pond Neighborhood Association
Federation of Indo-American Association of Northern California
Filipino Advocates for Justice
Filipino Community Christian Church
Filipino-American Community Svcs Agency
First Missionary Baptist Church of Antioch
First Morning Star Baptist Church
First Presbyterian Church
First Unitarian Church of Oakland
Forward Together
Foundation for Rehabilitation & Development of Children & Family
Fourth Bore Coalition
Fred Finch Youth Center
Fremont Freewheelers Bicycle Club
Fremont Chamber of Commerce
Fremont Community Ambassador Program for Seniors
Fremont Family Resource Ctr
Fremont Hindu Temple
Fremont Multi-Service Senior Ctr
Fremont Public Library
Fremont Transportation Div.
Friends of Alhambra Creek
Friends of Bus Rapid Transit
Friends of Livermore
Friends of Sausal Creek
Friendship Christian Ctr
Fruitvale - San Antonio Senior Ctr
Fruitvale Business Improvement District (Unity Council)
Fundamental Gospel Baptist Church
Genesis, Transportation Task Force
Girls, Inc.
Glad Tidings Community Church
Gladman Mental Health Rehab Ctr
Glenview Neighborhood Assoc
Golden Gate Bridge Highway & Transportation
Golden Gate Community Alliance
Good Hope Baptist Church/Bapt. Union
Grace Baptist Church
Grace Chinese Church
Gray Panthers
Great Communities Collaborative
Greater Cooper AME Zion Church
Greater Galilee Church
Greater New Beginnings Youth Svcs, Inc.
Greater Richmond Interfaith Program
Greek Orthodox Cathedral
Green Party of Alameda County
Green Ridge Heights Neighborhood Council
Greenbelt Alliance
Greenbriar Neighborhood Council
Grizzly Peak Homeowners Assoc
Gujarati Cultural Assoc of Bay Area
Gurdwara Sahib
Halcyon Neighborhood Assoc
Harbor House Ministries
Harvest Holy Ground Church
Hasford Heights Neighborhood Council
Hayward Area Planning Association (HAPA)
Hayward Chamber of Commerce
Hayward Day Labor Ctr
Hayward Democratic Club
Hayward Nonprofit Alliance
Hayward Police Department
Hayward Public Library
Hayward Senior Ctr
Hayward Unified School District
Healthy Communities
HEPPAC - HIV Education & Prevention
Project of Alameda County.
High Street Neighborhood Alliance
Hills Conservation Network
Hilltop District Neighborhood Council
Hilltop Family YMCA
Hilltop Green Homeowners Assoc
Hilltop Green Homeowners Neighborhood Council
Hispanic Chamber of Commerce of Alameda County
Hispanic Community Affairs Council
Homeless Action Ctr
Hong Lok Senior Ctr
Housing Opportunities Make Economic Sense
Human Outreach Agency: Flagg St House
Iglesia Bautista Ebenezer
Iglesia Luz Del Valle
Independent Living Skills Program
Indian Community Ctr
Indigenous Nations Child & Family Agency
Indo-American Community Federation
Interfaith Council
Intertribal Friendship House
Iron Triangle Neighborhood Council
Islamic Center of Fremont
Islamic Center of Pleasanton-Dublin
Jack London Business Development Improvement Dist
James Kenney Community Center
Japan Pacific Resource Network
Jewish Community Ctr of East Bay
Jewish Family & Children's Svcs
Joaquin Miller Heights Improvement Assoc
John George Democratic Club
Josie Barrow PACE Ctr
J-Sei Office
Kenneth C. Aitken Senior & Community Ctr
Kensington Public Library
Keys to the Heart International Church
Kidango
Kids First Oakland
Korean Berkeley United Methodist Church
Korean Community Center of the East Bay
Korean Grace Presbyterian Church
Korean Oakland United Methodist Church
Korean Youth Cultural Center
Koreatown Northgate Business District
La Clinica de la Raza
La Familia
Lake Merritt/Uptown District Assoc
Lakeshore Ave Business Improvement District
Lakeshore Homes Association
Laney Campus/Channel Park Neighborhood Coalition
Laney College
Laney College Student Group Contacts
Lao Family Community Development
Latham Terrace Assoc
Laurel District Association
Laurel Park Neighborhood Council
League of Women Voters
Lighthouse Mission Church
Livable Berkeley
Living Hope Christian Ctr
Longfellow Community Association
Lorin District Neighborhood Assoc
Love Temple Missionary Baptist Church
Lower Rockridge Parents Group
Lutheran Church of the Cross
Marina Bay Neighborhood Council
Marina Community Ctr
Market St Corridor Neighborhood Assoc, Inc.
Masjid Abu Bakr Al-Siddiq
Masjid Muhajireen
Masonic Ave Neighborhood Assoc
Masonic Home for Adults
Mastick Senior Ctr
May Valley Neighborhood Council
McClymonds High School
Memorial Tabernacle Church
Merritt College
Metro Walk Homeowners Neighborhood Council
Mid Pen Housing
Mills College
Mills Garden Neighborhood Association
Millsmont Homeowners
Montclair Village Assoc
Morning Star Church of God
Movement Generation
NAACP
Ralph & Mary Ruggieri Senior Ctr
Rebuilding Together Oakland
Refugee Transitions
Resources for Community Development
Richmond Annex Neighborhood Council
Richmond Annex Senior Ctr
Richmond BPAC
Richmond Chamber of Commerce
Richmond Heights Neighborhood Council
Richmond Improvement Association
Richmond Main St Merchants
Richmond Native Wellness Ctr
Richmond Neighborhood Coordinating Council
Richmond Public Library
Richmond Senior Ctr
Richmore Village Neighborhood Council
Rising Sun Energy Ctr
Rockridge Community Planning Council
Rockridge District Assoc
Rooted in Resilience
Rose Foundation For Communities & The Environment
Rose Garden Neighborhood Preservation Association
Rotary Club
Rubicon Programs, Inc.
Ruby's Place
RYSE Youth Ctr
Salvation Army
San Antonio Community Development Corporation
San Francisco Bay Area Rapid Transit District
San Leandro Chamber of Commerce
San Leandro Fair Housing Committee
San Leandro Hebrew Congregation-Temple Beth Sholom
San Leandro Library
San Leandro Village Homes Assoc
San Mateo County Transit District
San Pablo Avenue - Golden Gate Improvement Association
San Pablo Councilmember
San Pablo Neighborhood Council Assoc., Inc.
San Pablo Senior Adult Ctr
Santa Fe Neighborhood Council
Sanville Institute
Satellite Senior Homes
Second Chance Phoenix Project
SEIU, Local 1021
Senior Support Program of the Tri-Valley
Sequoyah Highlands Homeowners Assoc
Serra Center
Shattuck Neighborhood Crime Prevention Council (NCPC)
Shields-Reid Neighborhood Council
Sierra Club
Sikh Temple - Fremont and Hayward
Silliman Activity and Family Aquatic Center
Sindhi Community Of Northern California (SCNC)
Slater/Evergreen Homeowners Assoc
South Berkeley Senior Ctr
South County Homeless Project
South of The Nimitz Improvement Council (SONIC)
Southern Alameda County Buddhist Church
Southwest Richmond Annex Neighborhood Council
Spanish Speaking Citizen's Foundation
Special Olympics Northern California
Spectrum Community Svc
St John's Church
St Joseph’s Center for the Deaf
St Lukes Missionary Church
St Patrick Church St Vincent de Paul
St Paul Lutheran Church
St Vincent Day Home
St. Elizabeth Elementary School
St. Joseph the Worker Church, Berkeley
St. Mary's Gardens
St. Rose Hospital
Street Level Health
Sunkist Drive Neighbors
Tassafaronga Recreation Ctr
Taylor Memorial United Methodist Church
Telegraph Ministry Community Ctr
Temescal Telegraph Business Improvement District
Temple of Peace Baptist Church
The Greenlining Institute
The Open House Senior Ctr
The Stride Ctr
The Unity Council
The Webster Tract Neighbors Assoc
Tiburcio Vasquez Health Center
TMASF Connects
Top of Grand Ave Neighborhood Improvement League
TransForm
Tri-City African Methodist Episcopal Church
Tri-City Free Breakfast Program - Irvington Presbyterian Church
Tri-City Volunteers
Triumph Church
Tri-Valley Chinese Bible Church
Tri-Valley Haven
Tri-Valley Housing Opportunity Ctr
Tri-Valley One-Stop Ctr
Truelight Baptist Church
UC Berkeley College of Environmental Design/Dept. of City & Regional Planning
Ujamaa Youth Education Foundation
Union City Chamber of Commerce
Union City Public Library
United Democratic Campaign, Alameda County
United Filipinos of Alameda
United Neighborhood Councils of Oakland
United Roots Oakland
United Seniors of Oakland & Alameda County
University Ave Assoc
University Village Berkeley
Upper Zodiac Neighborhood Assoc
Urban Habitat
Urban Strategies Council
Urbanists for a Livable Temescal Rockridge Area
Urojas Ministry Ctr
Vet Center
Vietnamese Alliance Church
Vietnamese American Community Center of East Bay
Villa Fairmont Mental Health Rehab Ctr
Viola Blythe Community Svcs
Walk & Roll Berkeley
Walk Oakland Bike Oakland WOBO
Waterfront Action
Watergate Community Assoc
Welcome Home Baby
Wellstone Democratic Renewal Club
West Berkeley Neighborhood
West Berkeley Senior Ctr
West Grand Improvement Assoc
West Oakland Church of Christ
West Oakland Commerce Association
West Oakland Community Collaborative
(Prescott-Joseph)
West Oakland Environmental Indicators Project
West Oakland Health Council
West Oakland Project Committee
West Oakland Senior Ctr
West Oakland Web
West Side Baptist Church
Westlake Christian Terrace
Women on the Way Recovery Ctr
Women Organized to Respond to Life Threatening Diseases
Women’s Transportation Seminar
YMCA
Young Professionals in Transportation
Youth Employment Partnership
Youth Together
Youth Uprising
Zion First Church of God in Christ
Appendix C: Outreach Undertaken 2014 to 2017

This is a table that describes all the campaigns and activities that had a public engagement component between 2014 and 2017: what the events were, how they were publicized, the population targeted, how many people participated, what languages were used for publicizing/at the event, etc.

<table>
<thead>
<tr>
<th>Campaign</th>
<th>Dates</th>
<th>Target Audience</th>
<th>Outreach Strategies</th>
<th>Languages/Formats</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line 51 Project</td>
<td>2013-2017</td>
<td>General</td>
<td>Alameda</td>
<td>• All noticing materials, including information at bus stops printed in English, Spanish, and Chinese.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Public meetings</td>
<td>• Spanish, Mandarin, and Cantonese interpretation provided at all public meetings.</td>
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<td></td>
<td></td>
<td></td>
<td>• Transportation Commission &amp; Business Association meetings</td>
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<td></td>
<td></td>
<td></td>
<td>• Press Releases</td>
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<td></td>
<td></td>
<td></td>
<td>• Community mailer notification of bus stop changes and public meeting announcements</td>
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<td></td>
<td></td>
<td>• Council Meeting</td>
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<td></td>
<td>• Public construction announcement notification mailer</td>
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<td></td>
<td>• Bus Stop changes flyer posted at each bus stop</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>• Construction notification flyers on adjacent business/resident door knobs</td>
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<td>Berkeley</td>
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<td>Berkeley</td>
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<td></td>
<td></td>
<td></td>
<td>• Transportation Committee, Business Association, UC Berkeley meetings</td>
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<td></td>
<td></td>
<td>• Meetings with private business owners</td>
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<td></td>
<td></td>
<td></td>
<td>• Community mailer notification of bus stop changes and public meeting announcements</td>
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<td></td>
<td></td>
<td></td>
<td>• Public resident meetings</td>
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<td></td>
<td>• City Council meeting</td>
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<td>• Press releases</td>
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<td></td>
<td>• Construction notification announcement mailer &amp; flyers on business/resident doorknobs</td>
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<td></td>
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<td></td>
<td>• Bus Stop changes flyer posted at each bus stop</td>
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<td>• BPAC Meeting Announcement</td>
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<td>• Business Association Meetings (including Chinatown)</td>
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<td>• Meetings with business owners</td>
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<td>• Community mailer notification of bus stop changes and public meeting announcements</td>
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<td>• Public resident meetings</td>
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<td>• City Council meetings</td>
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<td>• Press releases</td>
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</tbody>
</table>
| Measure BB Public Education | 2014 | General | • Construction notification announcement mailer & flyers on business/resident doorknobs  
• Bus Stop changes flyer posted at each bus stop | • English  
• Translation & accessible formats provided upon request |
| A Better Ride: "I Ride" | 2014-2015 | AC Transit riders | • Bus exteriors and shelter ads  
• Digital advertising  
• Website and social media | • English  
• Translation & accessible formats provided upon request |
| Safety/Accident Prevention | 2014-2015 | AC Transit riders | • Print advertising  
• Website and social media | • English  
• Translation & accessible formats provided upon request |
| Plan ACT | 2014-2015 | General | • Print and digital advertising  
• Website and social media  
• Online and printed surveys  
• Community workshops  
• eNews, notice, and press release | • English  
• Spanish & Chinese (website, printed advertisement)  
• Safe Harbor Language Assistance & accessible formats provided upon request |
| Service Change Implementation | 2014-2015 | AC Transit riders | • Print and digital advertising  
• Direct mail  
• Community meetings  
• Notices and press release  
• Website and eNews  
• Public hearing | • English  
• Spanish & Chinese (website, printed advertisement)  
• Safe Harbor Language Assistance & accessible formats provided upon request |
| Stand Up 4 Transportation | 2015 | AC Transit riders | • Print advertising  
• Website and social media | • English  
• Translation & accessible formats available upon request |
| Transbay Service | 2015 | AC Transit riders | • Print advertising  
• Website and social media | • English  
• Translation & accessible formats available upon request |
| Americans with Disabilities Act 25th Anniversary | 2015 | General | • Print advertising: ad cards, car cards, brochure, posters, displays, banners  
• Video (YouTube, Gillie rooms, Board Meeting)  
• Website, eNews, and social media  
• Community events | • English  
• Spanish & Chinese (website, printed advertisement)  
• Safe Harbor Language Assistance & accessible formats |
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<th>Year(s)</th>
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<td>2015</td>
<td>General</td>
<td>Print and digital advertising, Notices and press release, Website and eNews, Signage and survey, Brand ambassadors, Demonstration event</td>
<td>English, Spanish, Chinese</td>
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<td>2015</td>
<td>Riders of these lines</td>
<td>Print and digital advertising, Website and social media, Survey, Community meetings and presentations, Stakeholder outreach</td>
<td>English, Spanish, Chinese</td>
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<tr>
<td>Schedule Expansion Plan</td>
<td>2015</td>
<td>AC Transit riders</td>
<td>Print and digital advertising, Direct mail, Community meetings, Notice, eNews, and press release, Website and social media, Brand ambassadors, At-stop signage</td>
<td>English, Spanish &amp; Chinese (website, printed advertisement), Safe Harbor Language Assistance &amp; accessible formats provided upon request</td>
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<tr>
<td>Late Night Bus Program</td>
<td>2015</td>
<td>AC Transit riders</td>
<td>Print and digital advertising, Community meetings, Notice, eNews, press conference, and press releases, Website and social media, At-stop signage</td>
<td>English, Translation &amp; accessible formats available upon request</td>
</tr>
<tr>
<td>Major Corridors Study</td>
<td>2015-2016</td>
<td>General</td>
<td>Print and digital advertising, Notices on buses, Printed materials, Website and social media, Customer surveys</td>
<td>English, Spanish and Chinese for surveys, noticing, and some materials, Spanish, Mandarin, and Cantonese interpretation at public meetings</td>
</tr>
<tr>
<td>Clipper Campaign</td>
<td>2015-2017</td>
<td>AC Transit riders</td>
<td>Print (shelter ad, ad cards, display ads), Radio advertising (KCBS, KEST, Univision), Website, eNews, and social media, Community presentations, Brand ambassadors</td>
<td>English, Spanish &amp; Chinese (website, printed advertisement), Safe Harbor Language Assistance &amp; accessible formats provided upon request</td>
</tr>
<tr>
<td>Measure C1 Public Education</td>
<td>2016</td>
<td>General</td>
<td>Print and digital information and FAQs, Telephone town hall, Community meetings, info booths, and presentations</td>
<td>English, Spanish &amp; Chinese (website, printed information)</td>
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<tr>
<td>Service</td>
<td>Years</td>
<td>Target Audience</td>
<td>Participation Methods</td>
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<td>-----------------------------------------------------------------</td>
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<tr>
<td>East Bay Bus Rapid Transit</td>
<td>2014-2017</td>
<td>General</td>
<td>Printed materials, Print and digital advertising, Direct mail, Community meetings and presentations, Notices, eNews, and press releases, Website and social media, Brand ambassadors, At-stop signage</td>
<td>English, Spanish, Chinese, Vietnamese (website, digital &amp; printed materials)</td>
</tr>
<tr>
<td>AC Go</td>
<td>2016-2017</td>
<td>AC Transit riders</td>
<td>Print and digital advertising, Direct mail, Community meetings and info booths, Notice, eNews, and press release, Website and social media, Brand ambassadors, At-stop signage</td>
<td>English, Spanish &amp; Chinese (website, printed advertisement)</td>
</tr>
<tr>
<td>Dumbarton Express</td>
<td>2017-2017</td>
<td>Riders in the Dumbarton Bridge area</td>
<td>Print and digital advertising, Website and social media, Press release, Info booths</td>
<td>English, Spanish, Chinese, Safe Harbor Language Assistance &amp; Accessible Formats Provided Upon Request</td>
</tr>
<tr>
<td>TipNow</td>
<td>2016-2017</td>
<td>AC Transit riders</td>
<td>Print and digital advertising, Website and social media, Press release</td>
<td>English, Spanish, Chinese, Safe Harbor Language Assistance &amp; Accessible Formats Provided Upon Request</td>
</tr>
<tr>
<td>Flex Pilot Program</td>
<td>2016-2017</td>
<td>Riders in Newark and Castro Valley areas</td>
<td>Print and digital advertising, Direct mail, Community presentations and info booths, Travel training &amp; train-the-trainer, Notice, eNews, and press releases, Website and social media, Brand ambassadors, At-stop signage</td>
<td>English, Spanish, Chinese, Safe Harbor Language Assistance &amp; Accessible Formats Provided Upon Request</td>
</tr>
<tr>
<td>Lines 14 and 19</td>
<td>2016-2017</td>
<td>Riders in Alameda</td>
<td>Print and digital advertising, Website and social media, Email to community organizations and elected officials, Community ribbon-cutting and photo-op, Brand ambassadors</td>
<td>English, Spanish, Chinese, Safe Harbor Language Assistance &amp; Accessible Formats</td>
</tr>
</tbody>
</table>
| Transbay Tomorrow | 2017 | AC Transit riders | At-stop signage  
| - | - | - | Email to community organizations and elected officials  
| - | - | - | Community presentations  
| - | - | - | Presentations at the Temporary Terminal  
| - | - | - | Presentation at ACTC  
| - | - | - | Printed advertising  
| - | - | - | Website, eNews, social media, and online surveys  
| - | - | - | On-Board Survey  
| - | - | - | At-stop signage (Transbay Terminal) | English  
| - | - | - | Spanish & Chinese (website, printed advertisement)  
| - | - | - | Interpreters available at community meetings  
| - | - | - | Safe Harbor Language Assistance & accessible formats provided upon request |

| Fare Change | 2017 | AC Transit riders | Email to community organization, and elected officials  
| - | - | - | Print and digital advertising  
| - | - | - | Direct mail  
| - | - | - | Community meetings  
| - | - | - | Notice, eNews, and press releases  
| - | - | - | Website and social media  
| - | - | - | Brand ambassadors  
| - | - | - | At-stop signage  
| - | - | - | Community presentations and info booths | English  
| - | - | - | Spanish & Chinese (website, printed advertisement)  
| - | - | - | Tagalog, Korean, Vietnamese (website)  
| - | - | - | Safe Harbor Language Assistance & accessible formats provided upon request |
Appendix D: Language Assistance Plan for those with Limited English Proficiency
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I. Executive Summary

Federal regulations require that agencies that receive federal funds, including AC Transit, “take reasonable steps to ensure meaningful access to their programs and activities by Limited English Proficient persons.” As a means of ensuring this access, the U.S. Department of Transportation (DOT) created a handbook which provides step-by-step instructions for conducting the required LEP needs assessment with the use of a four-factor analysis.

AC Transit undertook the needs assessment with determination that all reasonable efforts are made to ensure no member of its public is left underserved due to a limited ability to speak, read, write, or understand English. AC Transit wholeheartedly supports the goal of providing meaningful access to its services by persons with LEP and the entire community. AC Transit additionally supports the idea that providing language assistance to persons of limited-English-speaking abilities will have a positive impact not only on those with limited English skills themselves, but also on AC Transit ridership in general. Reaching out to the population with Limited English Proficiency (LEP) sends a positive – and truthful – message that they are welcome and appreciated. Making it easier for those with LEP to use its system will likely have a positive impact on AC Transit usage.

The needs assessment drives the development of the Language Assistance Plan (LAP) itself. The LAP identifies key measures the District currently takes and will undertake to enable people who don’t speak English very well to participate meaningfully in decision-making activities and to access the services AC Transit provides. The DOT guidance also specifies what the LAP must, at a minimum, include. The LAP includes general and specific recommendations, an analysis of resources, and an implementation plan.

A note on terminology: according to the federal regulations, the definition of “a person with Limited English Proficiency or LEP” is simply a person who does not read, write, speak, or understand English very well, and so may need language assistance in order to participate in decision-making activities or access service provided by a transit provider such as AC Transit. In this Language Assistance Plan, terms such as “LEP person (or community),” “person who doesn’t speak English very well,” and “person who needs language assistance” are used interchangeably.
II. The Four-Factor Assessment

The four-factor framework spelled out by the DOT was undertaken by AC Transit in the spring and summer of 2017 following prior assessments in 2011 and 2014.

The four-factor analysis is outlined in the following pages and consists of assessing the:

1. Number and proportion of people with Limited-English Proficiency served or encountered in the eligible service population;
2. Frequency with which those members of the LEP community come into contact with the program, activity, or service;
3. Nature and importance of the program, activity, or service provided by the program; and
4. Resources available to the recipient and costs.

The assessment was conducted by NWC Partners and Quantum Market Research with key support from AC Transit staff.

Factor 1: Identification of Individuals with LEP

Since the initial Language Assistance Plan created in 2011, a variety of analyses have been conducted to identify those who do not speak English very well. These utilized the American Community Survey 5-year samples (most recently 2011-2015 data) and data collected by the California Department of Education. Additionally, primary research was conducted with AC Transit employees to assess their level of interaction with the LEP community, and has been conducted with riders and the general public.

The employee survey is designed to provide information for both the Factor 1 and Factor 2 analyses. Among AC Transit employees, the level of contact with people who do not speak English very well varies, according to the types of jobs employees have.

Of the nearly 1.47 million persons within AC Transit’s service territory, a total of 20.45% do not speak English very well and are considered to have limited English proficiency. This level is at about the same level as it was three years ago.

Spanish and Chinese are the predominant languages spoken by those with LEP, accounting for nearly seven in ten of all LEP speakers. Spanish speakers alone account for 44% of service area residents who do not speak English very well (132,666). The number of Chinese speakers with LEP is 73,657.

The updated analysis shows the number of languages spoken by more than 1,000 people within the service area – the DOT’s “safe harbor” designation threshold – has increased to 16 since the last update three years ago, with the addition of Urdu.

The top five languages have not changed since the first LAP in 2011. The predominant languages are Spanish and Chinese (both Cantonese and Mandarin) followed by Tagalog, Vietnamese,
Korean. Speakers of these languages account for 83% of all of those who do not speak English very well.

**Factor 2: Frequency of Contact by LEP Persons with AC Transit Services**

Contact with people who do not speak English very well was assessed through the Factor 2 analysis, which confirms that the LEP community frequently uses AC Transit services, and AC Transit employees often cross paths with persons needing language assistance. About nine in ten of all employees who responded to the survey have some level of contact with the public. More than a third of them also encounter people who do not speak English very well on a daily basis.

Asked what people with LEP are typically seeking, AC Transit employees most often point to routes/wayfinding information (62% of employees cite this), schedules (46%), and fares (38%). Another 25% of employees report LEP persons seeking information about service changes or detours.

The languages encountered by AC Transit employees mirror those identified in the Factor 1 analysis: 77% say Spanish is one of the top three languages spoken by people who do not speak English very well. Close to that many (69%) say Chinese is one of the top languages, while 23% point to Vietnamese and 17% to Korean.

**Factor 3: Importance of AC Transit’s Programs, Activities, and Services to People with LEP**

Nothing speaks more to the reliance LEP persons have on transit in general and on AC Transit in particular than the fact that all but one of the community-based organizations (CBOs) who participated in the survey said the people they serve either use AC Transit as their main mode of transportation or use it at least sometimes. Eight in ten CBOs report their clients or members regularly ask about accessing public transportation options or have expressed a need for it.

Past research conducted with riders and the population at-large supports what employees and CBOs report: the type of information being sought by the LEP community is the same type of information being sought by the community at-large. The layer added on by those in the LEP community is that the information must be accessible in their native language. The on-board survey to be conducted later this year will, in addition to posing questions specifically relating to language proficiency and language spoken at home, ideally provide additional direction about what is needed by those who do not speak English very well.

It is critical that information is available in languages most commonly spoken within AC Transit’s service area in order to ensure access to AC Transit service by all. In addition to conducting research as part of LAP updates, AC Transit conducts other research designed to learn more about this population. AC Transit continues to improve by frequently connecting with all of its constituents: CBOs, riders themselves, business owners and residents near AC Transit projects, and its employees.
Factor 4: Available Resources and Costs of Language Assistance Services

The last step reviews current activities and budgets and then weighs the demand for additional language assistance against AC Transit’s existing and projected resources, both personnel and financial. The very detailed Factor Four analysis shows the myriad activities AC Transit currently undertakes to ensure that people who do not speak English very well are able to access the system as easily as the general population. Many changes recommended by the last update in 2014 have been implemented, and more are proposed, to further enhance the efforts to ensure access for all. Some proposed changes will have an impact on resources; some are related to policy changes that should be cost-neutral to implement. AC Transit remains committed to fully maximizing its resources to serve the greatest number of LEP persons with the greatest impact.

The following data inquiries and analyses were conducted to meet the requirements of the four-factor assessment and to assist the development of the Language Assistance Plan.
A. Analysis of Existing Data

Data Sources

For the District’s analysis, data from the American Community Survey (ACS) 2011-2015 5-year estimates were used. People are considered to have limited English proficiency if they indicated that they speak English “less than very well.”

A Note About Service Area Boundaries

The AC Transit Service Area boundary covers parts of both Alameda County and Contra Costa County, and does not align perfectly with U.S. Census boundaries. Census Tracts and Block Groups used for this analysis were identified during the redistricting process the District undertook following the 2010 Decennial Census, and include all geographies that are completely within the AC Transit boundary plus all areas within Union City. (Although Union City itself is not part of the AC Transit service area, the District supplies much service to and from Union City, and to Transit Centers within it.) The analysis area (hereafter referred to as the “service area”) also includes Tracts and Block Groups that overlap with the AC Transit boundary and whose population largely resides within the boundary. There are 363 Census Tracts and 1,076 Census Block Groups within the AC Transit service area.

Data Analysis

Safe Harbor languages are defined by FTA Circular 4702.1B as languages spoken by at least 1,000 individuals with Limited English Proficiency (LEP) within the service area, stating, “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.”

The methods used here to determine Safe Harbor languages in the AC Transit service area used Census Bureau data as described above and also drew from the 2014 AC Transit Language Assistance Plan and a previous analysis that followed the FTA Circular recommendations on assessing language assistance needs.

The 2011-2015 ACS data was used to identify LEP population by language within the service area. Sixteen languages were identified as Safe Harbor languages, fifteen of which are the same as identified in the last language assistance plan, and one — Urdu — which is new to the list with slightly more than 1,200 estimated LEP speakers (Table 1). The only individual language that is close but does not meet the Safe Harbor threshold is Thai, with 897 LEP speakers. In future studies, AC Transit may need to be prepared to respond if Thai or another language passes the threshold, as the total population of people with LEP is increasing in the District. Other language
groups also passed the 1,000 person threshold for Safe Harbor languages, but the data is not specific enough to determine if a single language within any group meets the threshold.

Of the nearly 1.47 million persons within AC Transit’s service territory, a total of 20.45% do not speak English very well and are considered to have limited English proficiency.

Some specific findings:

Between 2014 and 2017, the number of LEP speakers in the AC Transit service area increased by 10,683 (a 3.67% rise) to 301,737 total LEP speakers. The increase was concentrated in eight languages; there was a decline in LEP speakers of nine other languages. The biggest percentage increases occurred among LEP speakers of Arabic (+27.75%), Gujarati (+22.05%), Tagalog (+17.73%), and Chinese (+6.6%). Additionally, an increase in the number of Urdu-speaking persons with LEP moved it onto list with 1,209 LEP speakers.

Certain language groups saw sizeable increases. These included Other Indic Languages (+32.34%), African Languages (+22.91%), Other Asian Languages (+15.64%), and Other Pacific Island Languages (+10.03%).

When taken together, 16,120 persons with LEP speak South Asian languages (including Hindi, Gujarati, Urdu, and other languages in the Other Indic Languages group). This represents 5.35% of the total LEP population, placing the population of people with LEP from this part of the world high on the list. While these populations don’t speak the same language, it might be worth considering how resources can be effectively (and efficiently) used to reach people in these possibly overlapping communities within our service area.
Table 1
LEP Population in AC Transit Service Territory

<table>
<thead>
<tr>
<th>Language/Regional Group</th>
<th>2011-2015</th>
<th>2008-2012</th>
<th>Percentage of Total 2011-2015</th>
<th>Change in Number</th>
<th>Change in Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total LEP Population</td>
<td>301,737</td>
<td>291,054</td>
<td>100%</td>
<td>10,683</td>
<td>3.67</td>
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<tr>
<td>Spanish or Spanish Creole</td>
<td>132,666</td>
<td>131,987</td>
<td>43.97%</td>
<td>679</td>
<td>0.51</td>
</tr>
<tr>
<td>Chinese</td>
<td>73,657</td>
<td>69,099</td>
<td>24.41%</td>
<td>4,558</td>
<td>6.6</td>
</tr>
<tr>
<td>Tagalog</td>
<td>20,814</td>
<td>17,680</td>
<td>6.90%</td>
<td>3,134</td>
<td>17.73</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>16,491</td>
<td>16,422</td>
<td>5.47%</td>
<td>69</td>
<td>0.42</td>
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<tr>
<td>Korean</td>
<td>5,685</td>
<td>6,430</td>
<td>1.88%</td>
<td>-745</td>
<td>-11.59</td>
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<tr>
<td>Hindi</td>
<td>4,248</td>
<td>4,508</td>
<td>1.41%</td>
<td>-260</td>
<td>-5.77</td>
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<tr>
<td>Persian</td>
<td>3,924</td>
<td>4,421</td>
<td>1.30%</td>
<td>-497</td>
<td>-11.24</td>
</tr>
<tr>
<td>Arabic</td>
<td>2,928</td>
<td>2,292</td>
<td>0.97%</td>
<td>636</td>
<td>27.75</td>
</tr>
<tr>
<td>Japanese</td>
<td>2,366</td>
<td>3,034</td>
<td>0.78%</td>
<td>-668</td>
<td>-22.02</td>
</tr>
<tr>
<td>Portuguese or Portuguese Creole</td>
<td>2,047</td>
<td>2,258</td>
<td>0.68%</td>
<td>-211</td>
<td>-9.34</td>
</tr>
<tr>
<td>Russian</td>
<td>1,674</td>
<td>1,978</td>
<td>0.55%</td>
<td>-304</td>
<td>-15.37</td>
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<tr>
<td>Mon-Khmer, Cambodian</td>
<td>1,570</td>
<td>2,095</td>
<td>0.52%</td>
<td>-525</td>
<td>-25.06</td>
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<tr>
<td>Gujarati</td>
<td>1,533</td>
<td>1,256</td>
<td>0.51%</td>
<td>277</td>
<td>22.05</td>
</tr>
<tr>
<td>Laotian</td>
<td>1,459</td>
<td>1,528</td>
<td>0.48%</td>
<td>-69</td>
<td>-4.52</td>
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<tr>
<td>French</td>
<td>1,244</td>
<td>1,191</td>
<td>0.41%</td>
<td>53</td>
<td>4.45</td>
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<tr>
<td>Urdu</td>
<td>1,209</td>
<td>(new to list)</td>
<td>0.40%</td>
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<tr>
<td>Other Indic Languages</td>
<td>9,130</td>
<td>6,899</td>
<td>3.03%</td>
<td>2,231</td>
<td>32.34</td>
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<tr>
<td>Other Asian Languages</td>
<td>7,069</td>
<td>6,113</td>
<td>2.34%</td>
<td>956</td>
<td>15.64</td>
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<tr>
<td>African Languages</td>
<td>3,755</td>
<td>3,055</td>
<td>1.24%</td>
<td>700</td>
<td>22.91</td>
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<tr>
<td>Other Pacific Island Languages</td>
<td>2,764</td>
<td>2,512</td>
<td>0.92%</td>
<td>252</td>
<td>10.03</td>
</tr>
<tr>
<td>All Other Non-English Languages*</td>
<td>5,504</td>
<td>6,296</td>
<td>1.82%</td>
<td>-792</td>
<td>-12.58</td>
</tr>
</tbody>
</table>

Data obtained from the 2008-2012 American Community Survey 5-Year Estimates, Table B16001 “Language Spoken at Home by the Ability to Speak English” and 2011-2015 American Community Survey 5-Year Estimates, Table B16001 “Language Spoken at Home by the Ability to Speak English for the populations 5 Years and Over”

*LEP population for each language included is below the 1,000 person Safe Harbor threshold. These languages include: French Creole, Italian, German, Yiddish, other West Germanic languages, all Scandinavian languages, Greek, Polish, Serbian, other Slavic languages, Armenian, other Indo-European languages, Hmong, Thai, Navajo, all other North American Native languages, Hungarian, Hebrew, and any other languages. Only Thai and other Indo-European languages come close to meeting the Safe Harbor threshold, at 897 and 945 LEP speakers, respectively.
Staff also examined English Learner data from the California Department of Education (Table 2). The most common languages spoken by English learners are Spanish, Chinese, Arabic, Tagalog, and Vietnamese. As with languages spoken by persons with LEP in the District overall, South Asian languages individually and as a group are spoken by a large number of English learner students, with Punjabi, Hindi, Telugu, and Urdu being the most common.

Table 2
Most Common Languages Spoken by English Learners in Schools Served By AC Transit

<table>
<thead>
<tr>
<th>English Learner Population</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>36,632</td>
</tr>
<tr>
<td>Chinese languages</td>
<td>4,402</td>
</tr>
<tr>
<td>Cantonese</td>
<td>2,651</td>
</tr>
<tr>
<td>Mandarin</td>
<td>1,680</td>
</tr>
<tr>
<td>Arabic</td>
<td>1,966</td>
</tr>
<tr>
<td>Tagalog</td>
<td>1,610</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>1,407</td>
</tr>
<tr>
<td>South Asian Languages</td>
<td>3,124</td>
</tr>
<tr>
<td>Punjabi</td>
<td>928</td>
</tr>
<tr>
<td>Hindi</td>
<td>674</td>
</tr>
<tr>
<td>Telugu</td>
<td>528</td>
</tr>
<tr>
<td>Urdu</td>
<td>393</td>
</tr>
<tr>
<td>Farsi/Persian</td>
<td>546</td>
</tr>
<tr>
<td>Korean</td>
<td>253</td>
</tr>
<tr>
<td>Portuguese/Portuguese Creole</td>
<td>238</td>
</tr>
<tr>
<td>Khmer</td>
<td>220</td>
</tr>
<tr>
<td>Russian</td>
<td>176</td>
</tr>
<tr>
<td>Japanese</td>
<td>171</td>
</tr>
<tr>
<td>French</td>
<td>147</td>
</tr>
</tbody>
</table>

There are a total of 1,076 Census block groups within the ACT service area. More than 20% of residents do not speak English very well in 475 of these block groups, and more than 50% of residents do not speak English very well in 28 of them. Although there has been a significant increase in the number of residents who do not speak English very well (a 3.67% rise compared to the 2014 update), the overall percentage of persons with LEP in the service area population has remained at just over 20%.

Figure 1 shows the distribution of the LEP population within the ACT Service Area. Four groupings of blocks were created: where the LEP population percentage is less than 20% (the actual LEP
average for the service area), where it is between 20.1% and 50%, 50.1% and 75%, and greater than 75%.

Figures 2-3 present maps for the top languages in the AC Transit service area: Spanish and Chinese, using the same approach.
Figure 3: Chinese Speakers in the AC Transit Service Area with Limited English Proficiency
Summary

Data sources such as the American Community Survey and the California Department of Education were reviewed as a means of classifying the languages spoken in the AC Transit service area into two categories for the purposes of developing the LAP. These categories are as follows:

- **Primary**: This represents the two languages that are spoken in the heaviest concentrations in the District (Spanish and Chinese)
- **Safe Harbor**: This represents the remaining languages in the service area that meet the safe harbor definition and includes a total of 14 additional languages (up from 13 languages in the 2014 update with the increase in the number of residents speaking Urdu).

The data analysis found that people who do not speak English very well make up 20.45% of the population living in the AC Transit service area.
B. EMPLOYEE SURVEY ON CONTACT WITH LEP PERSONS

Approach

Surveys with AC Transit employees were a vital component in assessing interactions with riders and members of the public who do not speak English very well. Employees represent all of AC Transit in their encounters with people, including those with LEP. Three different survey versions were required: one for bus operators (online and hard copy), one for all other AC Transit employees, and one for employees at the customer call center. (Copies of all surveys can be found in the Appendix.) All employees with email addresses received a link from the General Manager to the online survey, and bus operators were notified by district superintendents that the survey was available online as well at computers in all four Gillie Rooms. To boost participation by the drivers, QMR staff visited the four yards in June to distribute hard copy surveys and encourage their participation. In the end, 219 people answered the internal survey:

<table>
<thead>
<tr>
<th>Table 3</th>
<th>Number of Surveys Completed by Type</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>#</td>
</tr>
<tr>
<td>Non-drivers</td>
<td>115</td>
</tr>
<tr>
<td>Bus drivers</td>
<td>88</td>
</tr>
<tr>
<td>Call center</td>
<td>16</td>
</tr>
</tbody>
</table>

It should be noted that some differences this time compared to the last update may reflect the types of positions held by employees completing the survey; they do not necessarily reflect a difference in the overall number of people with LEP within AC Transit’s service territory.

Results

Initial questions were designed to assess contact with any members of the public or riders, asking all non-drivers if they encounter the public on a typical day and, if not, if they interact with the public over the course of the year.

Among non-drivers, 52% say they encounter members of the public on a typical day.

<table>
<thead>
<tr>
<th>Table 4</th>
<th>Whether Encounter Riders/Members of Public in Typical Day</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(Base = 59.8% Non-drivers)</td>
</tr>
<tr>
<td></td>
<td>%</td>
</tr>
<tr>
<td>Yes</td>
<td>52.2%</td>
</tr>
<tr>
<td>No</td>
<td>47.8%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>
Twenty-five percent of all respondents were non-drivers who do not interact with the public on a typical day. Table 5 shows that more than half of them have interaction with members of the public during the year.

**Table 5**

<table>
<thead>
<tr>
<th>Whether Encounter Riders/Members of Public over Course of Year</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Base = 25.1% Non-drivers Who do not Encounter Public in Typical Day)</td>
<td></td>
</tr>
<tr>
<td>Yes</td>
<td>54.5%</td>
</tr>
<tr>
<td>No</td>
<td>45.5%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Everyone with at least some contact with riders or members of the public – about nine in ten respondents – were asked how many riders or members of the public they encounter daily. Three years ago, three in ten said they never encounter riders or members of the public on a typical day; today that number stands close to that at nearly three in ten with no daily contact.

One-third of all respondents encounter 50 or more members of the public and riders each day.

**Table 6**

<table>
<thead>
<tr>
<th>Number of Riders/Members of Public Encountered Daily</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero</td>
<td>27.4%</td>
</tr>
<tr>
<td>1 to 9</td>
<td>17.4%</td>
</tr>
<tr>
<td>10 to 49</td>
<td>21.9%</td>
</tr>
<tr>
<td>50+</td>
<td>33.3%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

As was the case in the update three years ago, six in ten employees say riders and members of the public they encounter are looking for information on routes/wayfinding. This year, even more report the public is seeking information on schedules (vs. 54.7% in 2014). The most significant change is the increase in employees reporting the public is looking for information on service changes/detours: now 44.1% say this is what the public is seeking, but in 2011 only 25.7% said this is what was being sought. One reason for this is that there have been major and ongoing service changes throughout the District since the last update, and there have been many more city-wide activities that led to service disruptions, such as marathons, parades, protests, etc. An additional explanation is that printed schedules are not reprinted automatically on many routes as increasing numbers of riders are downloading information rather than turning to printed schedules.
Table 7
Services/Information Sought by Riders/Public*

<table>
<thead>
<tr>
<th>Service/Information</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Schedules</td>
<td>63.6%</td>
</tr>
<tr>
<td>Routes/wayfinding</td>
<td>61.5%</td>
</tr>
<tr>
<td>Fares</td>
<td>46.2%</td>
</tr>
<tr>
<td>Service changes/detours</td>
<td>44.1%</td>
</tr>
<tr>
<td>Complaints/commendations</td>
<td>40.5%</td>
</tr>
<tr>
<td>Bus conditions (broken equipment, cleanliness, etc.)</td>
<td>28.2%</td>
</tr>
<tr>
<td>ADA/accessibility for the disabled</td>
<td>22.6%</td>
</tr>
<tr>
<td>Public information (hearings, board meetings, etc.)</td>
<td>13.8%</td>
</tr>
<tr>
<td>Discrimination</td>
<td>9.2%</td>
</tr>
<tr>
<td>Crime/security</td>
<td>9.2%</td>
</tr>
<tr>
<td>Accidents</td>
<td>8.7%</td>
</tr>
<tr>
<td>Other</td>
<td>10.3%</td>
</tr>
<tr>
<td>Don't know</td>
<td>5.6%</td>
</tr>
</tbody>
</table>

* Multiple responses accepted

Encounters with people with limited proficiency in English have lessened a bit. Slightly more respondents in the current survey encounter fewer than 5% or no riders who don't speak English very well – 32.5% this year vs. 30.4% in 2014. Additionally, the number of respondents who estimate riders with LEP to be at least 20% of all they encounter each day has fallen; now, 35.6% estimate those with LEP represent 20% or more of their encounters each day, vs. 41% in 2014. Taken together, those two differences represent an overall lowering in the number of AC Transit employees who encounter many people with LEP.

Table 8
Percent of Riders Encountered With LEP

<table>
<thead>
<tr>
<th>Percentage</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zero/Not applicable</td>
<td>18.3%</td>
</tr>
<tr>
<td>Less than 5%</td>
<td>14.2%</td>
</tr>
<tr>
<td>5% to 19%</td>
<td>32.0%</td>
</tr>
<tr>
<td>20% to 49%</td>
<td>19.6%</td>
</tr>
<tr>
<td>50% or more</td>
<td>16.0%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

One-third of employees report encountering people who do not speak English very well at least daily. This represents a significant drop compared to respondents in 2014, when four in ten of those employees encountered those with LEP on a daily basis. More this year – 43.4% – encounter people with LEP less often than once a month, rarely, or never, compared to 33.6% in 2014.
Table 9
How Often Are LEP Riders Typically Encountered

<table>
<thead>
<tr>
<th></th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Many times a day</td>
<td>17.4%</td>
</tr>
<tr>
<td>A few times a day</td>
<td>15.5%</td>
</tr>
<tr>
<td>A few times a week</td>
<td>12.3%</td>
</tr>
<tr>
<td>A few times a month</td>
<td>11.4%</td>
</tr>
<tr>
<td>Less than once a month</td>
<td>15.5%</td>
</tr>
<tr>
<td>Rarely or never</td>
<td>27.9%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Just as employees were asked what information was being sought by all riders, they were also asked what information the LEP population was specifically seeking. More than six in ten employees report that riders who don’t speak English very well are typically seeking information about routes/wayfinding, which is also sought by all riders at the same level regardless of English proficiency. Other primary types of information sought by those riders and members of the public with LEP include schedules, fares, and service changes/detours. As has consistently been the case, far fewer employees felt riders with LEP were interested in making complaints or commendations than riders in general are, with 18.6% of employees saying riders with LEP are seeking that compared to 40.5% saying the same about riders generally.

Table 10
Services/Information Sought by Riders/Public with LEP*

<table>
<thead>
<tr>
<th></th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Routes/wayfinding</td>
<td>61.9%</td>
</tr>
<tr>
<td>Schedules</td>
<td>45.9%</td>
</tr>
<tr>
<td>Fares</td>
<td>38.1%</td>
</tr>
<tr>
<td>Service changes/detours</td>
<td>25.3%</td>
</tr>
<tr>
<td>Complaints/commendations</td>
<td>18.6%</td>
</tr>
<tr>
<td>ADA/accessibility for the disabled</td>
<td>10.3%</td>
</tr>
<tr>
<td>Bus conditions (broken equipment, cleanliness, etc.)</td>
<td>7.2%</td>
</tr>
<tr>
<td>Public information (hearings, board meetings, etc.)</td>
<td>7.2%</td>
</tr>
<tr>
<td>Accidents</td>
<td>4.6%</td>
</tr>
<tr>
<td>Discrimination</td>
<td>4.1%</td>
</tr>
<tr>
<td>Crime/security</td>
<td>3.1%</td>
</tr>
<tr>
<td>Other</td>
<td>6.2%</td>
</tr>
<tr>
<td>Don't know</td>
<td>13.9%</td>
</tr>
</tbody>
</table>

* Multiple responses accepted

The languages reported as commonly being used by speakers with limited English skills are similar to those reported in the past: Spanish is clearly encountered most, followed closely by Chinese. One-
quarter of employees say they encounter Vietnamese speakers, while just under two in ten encounter Tagalog or Korean speakers.

### Table 11
**Languages Commonly Spoken by Riders with LEP**

<table>
<thead>
<tr>
<th>Language</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>84.0%</td>
</tr>
<tr>
<td>Chinese</td>
<td>75.8%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>25.3%</td>
</tr>
<tr>
<td>Korean</td>
<td>18.0%</td>
</tr>
<tr>
<td>Tagalog (Filipino)</td>
<td>17.0%</td>
</tr>
<tr>
<td>Other</td>
<td>8.8%</td>
</tr>
<tr>
<td>Don’t know/Not applicable</td>
<td>6.2%</td>
</tr>
</tbody>
</table>

*Multiple responses accepted

Asked to pick the top three languages spoken by the riders with limited English skills, employees’ answers mirror those of the common languages they encounter. Spanish tops the list, followed by Chinese.

### Table 12
**Top Three Languages Spoken by Riders with LEP**

<table>
<thead>
<tr>
<th>Language</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>76.8%</td>
</tr>
<tr>
<td>Chinese</td>
<td>68.6%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>23.2%</td>
</tr>
<tr>
<td>Korean</td>
<td>17.0%</td>
</tr>
<tr>
<td>Tagalog (Filipino)</td>
<td>11.9%</td>
</tr>
<tr>
<td>Other</td>
<td>6.2%</td>
</tr>
<tr>
<td>Don’t know/Not applicable</td>
<td>5.7%</td>
</tr>
</tbody>
</table>

*Multiple responses accepted

Employees were also asked about their own language skills. One-quarter of all employees report being proficient in another language.

### Table 13
**Respondent Non-English Proficiency**

<table>
<thead>
<tr>
<th></th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>24.2%</td>
</tr>
<tr>
<td>No</td>
<td>75.8%</td>
</tr>
<tr>
<td>Total</td>
<td>100.0%</td>
</tr>
</tbody>
</table>
Nearly two-thirds of the employees who speak another language well report speaking Spanish, while another one in ten speaks Chinese. In addition to Filipino, other languages spoken by these employees include Indian languages (including Hindi and Punjabi), French, and Portuguese.

Table 14
What Other Languages Do You Speak Well?*  
(Base = 24.2% Who Speak Other Language Well)

<table>
<thead>
<tr>
<th>Language</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>64.2%</td>
</tr>
<tr>
<td>Chinese</td>
<td>11.3%</td>
</tr>
<tr>
<td>Tagalog (Filipino)</td>
<td>1.9%</td>
</tr>
<tr>
<td>Other</td>
<td>22.6%</td>
</tr>
<tr>
<td>Don’t know/Not applicable</td>
<td>5.7%</td>
</tr>
</tbody>
</table>

*Multiple responses accepted

Employees offered a variety of ideas in response to the question, “What training, assistance and/or tools could AC Transit give employees to help them assist people who don’t speak English well, are from other countries, don’t have much education, etc.?" While a complete list of verbatim responses is provided in the appendix, the following are some of the responses made grouped into major categories including more printed information in other languages, additional in-house translation and interpretation, language classes, etc.

Printed Information in Other Languages

- Simple conversation paper that converts English into other languages. Example: The fare, greetings and to take a seat for safety.
- Signs on buses/in shelters in different languages. Brochures that have simple pictures to tell information.
- It would be great if AC Transit provided a small card with language assistance info. I could give away those cards as I come across with people who are needing assistance in languages other than English.
- Basic phrases in the languages they may encounter as well as cards with FAQs in a variety of languages they can hand to a customer.
- Placards w/pictures.
- It might be helpful to have language "flash cards" with clear graphics covering some of the common topics that the non-English-speaking public may need to know. These may be especially helpful for drivers. I am not a driver so drivers should really decide if flash cards would be helpful.
- Bilingual information about routes and schedules, in hard copy and on-line form.
I prefer that bus operators have printed materials available with words/phrases in other languages instead of technology based for this reason: it is against District policy to use electronic devices when operating District vehicles. Not all customers have access to smartphones and social media platforms.

**Additional in-house Translation and Interpretation**

- Referral to language translation services phone numbers.
- Interpreter call-in line.
- Instruction in the use of Language Link.
- We have an over-the-phone interpretation service that is very helpful.
- Maintain an active list of multi-lingual District employees who are willing to assist in any translation needs. If assistance is needed any worker would pull out the list and see who's available to help based on the language spoken and proximity. IS department could possible come up with the infrastructure (web site or application) to support all this.

**Language Classes for Employees**

- Spanish refresher course focused on AC Transit's service related terminology will help me.
- Encourage staff to take classes to learn another language so they can communicate better.
- Incentives for language training for operators.
- A training course in different languages.
- Language classes, to convey our basic information about services.
- As drivers, we can take classes to learn other languages and AC Transit can help the drivers who want to learn the languages.
- Help me, as a driver, learn simple phrases in other languages. “Good morning. What is your destination?” Other phrases.

**Translation apps/devices**

- Electronic device that can be spoken into and translated to us and in reverse.
- Ipad with app translator. Use iphone app for translation.
- Provide employees who frequently interact with people who do not speak English with training and a translation app for smartphones. This will assist our employees to understand our customer's need and better guide them to a solution.
- Install an App to translate their language, for instances Siri's.
- Teach us about things like how to create a message that can be put through Google translate and come out easily.
- Voice apps for smartphone.

All employees (except call center representatives) were asked where AC Transit should focus its efforts in improving communications with all riders and members of the public. Allowed to pick as many as
three from a list of 11 possible efforts, six in ten employees – far and away the greatest number – ask for AC Transit to focus on signs and information in different languages.

Table 16
Where Should AC Transit Focus its Efforts to Improve Communications with all Riders/Members of the Public*

<table>
<thead>
<tr>
<th>%</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Signs and information in different languages</td>
<td>58.8%</td>
</tr>
<tr>
<td>Voice recognition apps for smartphones</td>
<td>34.7%</td>
</tr>
<tr>
<td>Access to in-house translators through a telephone language line</td>
<td>33.2%</td>
</tr>
<tr>
<td>Providing employees with manuals containing common terms and phrases in other languages</td>
<td>31.7%</td>
</tr>
<tr>
<td>More customer service information</td>
<td>29.1%</td>
</tr>
<tr>
<td>More bilingual employees</td>
<td>22.6%</td>
</tr>
<tr>
<td>Website</td>
<td>21.6%</td>
</tr>
<tr>
<td>Advertising</td>
<td>17.1%</td>
</tr>
<tr>
<td>Social media (Facebook, Twitter, etc.)</td>
<td>17.1%</td>
</tr>
<tr>
<td>Employees wearing “I speak...” buttons indicating other languages they speak</td>
<td>16.6%</td>
</tr>
<tr>
<td>Community meetings</td>
<td>13.1%</td>
</tr>
</tbody>
</table>

* Multiple responses accepted

What is most noteworthy, however, is the fact that more than one-third of all employees want AC Transit to focus its efforts on voice recognition apps for smartphones. Three years ago, “light years ago” in technology terms, just two in ten named these apps as one of the three top focuses for the agency. As evidenced when offering their own suggestions on what tools AC Transit can give employees to help them assist those who don’t speak English very well, the desire for the translator or interpreter apps is increasing, even as it is acknowledged that drivers are restricted in their use of phones while operating the bus. Also chosen by about one-third of employees were access to in-house interpreters through a telephone language line (which the District has but which has not been rolled out for drivers) and more customer service information.

Summary

The surveys asked AC Transit’s workforce to describe the landscape as they see it, on the front lines as drivers and call center representatives, management and supervisory personnel, and others, providing support toward achieving the goal of providing the best possible assistance to riders and members of the public who do not speak English very well. This landscape shows:
• Nine in ten employees encounter members of the public or riders, and one-third of all surveyed employees report encountering 10 or more members of the public/riders each day.

• Three in ten report that 20% or more of the people they encounter are those with limited English skills, and a third say they encounter people needing language assistance on a daily basis.

With such a landscape, it is valuable to see employees’ desire to communicate with and assist all riders and members of the public, regardless of language spoken or education level or disability or any other potential barrier to service. What the survey showed was that employees believe:

1. The best tools and training AC Transit can provide to help employees serve those with limited English skills are printed information in other languages, additional in-house translation and interpretation, language instruction for employees, and the use of translation apps. Although printed information in other languages is clearly the top desire by far, the increase in the number of employees clamoring for translation apps is worth noting.

2. Persons with LEP are most often seeking routes/wayfinding information, information about schedules, and fare details. Employees want such in-language information readily and easily accessible to them, be it printed or accessible via an app.

3. As was the case three years ago, riders who don’t speak English very well are less likely to be seeking to make complaints or commendations than riders and members of the public in general.

4. Spanish is the language most often spoken by riders with limited English skills, but Chinese is also quite often spoken. Perceived as being spoken by fewer yet still sizeable numbers is Vietnamese, followed by Korean and Tagalog.
C. **INTERVIEWS WITH COMMUNITY-BASED ORGANIZATIONS**

**Approach**

Feedback from employees was not the only feedback obtained as AC Transit sought to update its Title VI program. Via an online survey, all of the community-based organizations (CBOs) maintained in AC Transit’s database were asked to speak for the communities they represent, and offer their insights about the needs of community members with LEP and how AC Transit can better meet those needs.

The survey was designed to include people representing non-profit organizations, such as those providing social services, immigration or legal information, and health care, as well as other governmental agencies and educational and business organizations. In total, representatives of 26 different CBOs completed the survey. Although the survey did not require the respondents to provide their name of their organizations due to a guarantee of confidentiality, most indicated what type of organization they represented, with the bulk representing non-profits that focus on a variety of issues, including:

- ESL programs and family support services
- Community and economic development
- Disability and technology services
- Adaptive sports and recreation
- Voter services
- Transportation
- Providing food
- Domestic violence program
- Community organizing coalition
- Housing
- Legal
- Neighborhood groups

Others represented in the survey include four with an academic focus and several in government or transit.

About half provided their organization’s name. Known participants in the survey included:

- A Safe Place
- Bay Area Outreach & Recreation program
- Berkeley City College
- Bike Walk Alameda
- Center for Accessible Technology
- Coolidge Court, Inc.
- First Unitarian Church of Oakland
Speaking for their communities, the representatives answered questions about the demographic information of the populations they serve, their clients’ or members’ transportation needs and use of public transit, difficulties of persons with LEP in using public transit, the types of information needed, methods of communication with the populations, and methods of delivering the information.

Findings

The CBOs represented in the survey reflect a wide range of organizations serving relatively small numbers of people, 1,000 or less, to those serving 100,000 or more within AC Transit’s service territory. All told, 13 of the CBOs serve smaller numbers of people, while six represent the largest organizations. The remainder falls between representing 2,000 and 10,000 in total. It should be noted that respondents were asked to focus only on the people within the District’s territory. Some of the organizations work for the interests of people throughout the Bay Area and beyond.

Stepping back to assess the size of the population they serve, more than half of the CBOs say the number has increased over the past three years. Just one – the smallest of the organizations represented – reports it has decreased, with the remainder indicating the size has stayed the same.

Asked the top countries of origin of their members or clients, more than half included the United States as one of the primary native countries. About one-third said Mexico is the country of origin, and about as many named China or other Asian countries. Countries specifically named (in addition to the U.S., Mexico, and China) included:

- Other Asian countries generally and Thailand and Vietnam specifically
- Non-specific Central American and South American countries as well as Bolivia specifically
- European countries generally
- Yemen
- Ethiopia
- Eritrea

Limited to selecting the three primary languages the people they serve speak, nearly everyone selected English and Spanish. For the remaining primary third language, half selected Chinese. The other languages listed as in the top three were cited by no more than one CBO representative each (Tagalog, Vietnamese, Japanese, and several Chinese and African dialects).
Most of the CBOs provide services to two or more of three age categories – youth, adults, and seniors – with just a few limiting it to either only youth or seniors.

The literacy levels of their populations were assessed in two ways: their native language and in English. When it comes to gauging literacy in native language, nearly all of the CBOs reported their populations had at least an intermediate level of literacy. But when it comes to gauging literacy in English, four in ten of the CBOs said the people they serve have literacy levels of basic or below basic. Less than half said it was greater than intermediate.

When it comes to the degree the populations rely on AC Transit for their transportation, just one of the CBOs reported that the population they serve never uses public transit. Those able to gauge were as likely to say AC Transit was their main transportation as they were to say that, while their clients might not rely on public transit, they do use it sometimes.

Fully eight in ten say the population they serve regularly asks how to access public transportation or has expressed the need for public transit.

The remainder of the questions asked for detailed answers about difficulties in using public transit, how best to gather input from the communities, what needs are not being met by AC Transit, and the best ways to communicate with their communities.

The CBO representatives pointed to a number of difficulties their populations have in using the public transportation system, although difficulties relating to lack of English were only specifically named by a few. More difficulties related to affordability, service frequency, and accessibility. Below are some of the comments made about the difficulties:

- “Accessibility issues, including physical access, reading printed material due to literacy or vision issues, gaining access to online info from inaccessible websites.”
- “Don’t speak English.”
- “Mainly getting route information in an area where they are unfamiliar.”
- “Accessing Clipper cards and passes (obtaining the cards and passes themselves, and getting information about the programs). Also affording fares.”
- “Youth who go to public school face barriers if they rely on public transit and don’t have enough funds to by bus fare.”
- “Clients with mental health disabilities have difficulty accessing paratransit. For many of our homeless and disabled clients, the $20 fee for a monthly sticker is still too high for them to afford due to General Assistance income of only $336 per month. Additional funding to improve access to indigent Alameda County residents would be extremely beneficial, and would help agencies deliver services to more people.”
- “Lack of money.”
- “The population we served are very, very low income. Price is the main factor. Someone brought in AC rate hike starting July 1st. Recent bus route changes have made our clients confused.”
- "Buses not running frequently enough or not enough routes; difficulty accessing paratransit; expense of bus tickets."
- "Not as many buses running to where they are going or where they need to be picked up. Hours of buses don’t always fit with the transportation needs."
- "Matching their schedules with actual bus times."
- "We are located right next to both the Bart and AC transit stops, so the only thing that we hear concerns about is the frequency of the service."
- "Not enough bus routes, long times to reach destination."
- "Not within walking distance and wait times are long between buses."
- "Our neighborhood is isolated so it would be nice to have bus service more frequent."
- "Personal mobility difficulties."
- "The general population relies on personal vehicles or TNCs (e.g. Uber, Lyft). A subset uses BART, and then the TNCs for ‘the last mile.’ From our perspective, TNCs have negatively impacted AC Transit ridership except for its most dependent users that is primarily composed of seniors, low-income community members and students."

Suggestions on the best ways to obtain input from their populations were also requested, and respondents provided a litany of ways, with personal contact leading the list, including offers from quite a few of the CBOs to serve to foster the connection. Surveying the populations, in person as well as via other means, was mentioned several times, echoing the recommendation for personal contact.

Comments included:
- "Come and listen to them directly."
- "Direct (person to person), at events, schools, etc."
- "Focus groups, near transit. Provide food to eat in the session and some food to go. Provide a $10-15 stipend for their time. Cash is best."
- "Hold a seminar at the Senior center."
- "Outreach directly to the population."
- "Talk in person."
- "We have challenges with our own surveys and not sure there is a best way outside of doing a little of every type of outreach (e.g. in person, phone, email, social media, etc.). In terms of turning out people to events, we’ve been most successful when we partner with community- and faith-based organizations."
- "No idea which is best. All ways to reach out are valid, direct email, social media, phone surveys, newspapers soliciting input, community meetings."
- "Contracting with community based organizations and institutions that have trusted relationships with the population, and speak their language."
- "We interact with them directly to determine what their specific needs are so that we can assist them in their transportation."

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- "Surveys taken on the bus or at bus stops; surveys of homeless encampments."
- "Direct feedback from public transit users, if possible."
- "Having people administer surveys in person would be extremely effective, especially if there was a small incentive offered for participation like a $5 Subway gift card or something similar."
- "Surveying and having a day where you come to [school] to hear feedback. You can email surveys to [contact] so that she can advertise them and distribute them. She can also develop surveys according to AC Transit guidelines."
- "Surveys or letters addressed to their homes."

Respondents clearly spent time crafting answers to the question of what their populations need from AC Transit to be better served. Many responses were applicable to all populations, not just to persons with LEP, and they centered on the general desires for increased service frequency, greater accessibility, and lower fares.

- "More funding to subsidize low income, disabled transit users. Greater attention to accommodation of mental health disabilities, as well as physical. Education of transit operators and staff regarding accommodation, understanding, and compassion for people with mental health disabilities."
- "Access to discount tickets (and easy eligibility determination process); easy information about access to paratransit."
- "Again personal finances are the problem. We serve homeless people."
- "A clear plan to try to fully fund school transportation so that it is free and universal. A way to engage on issues that is not just speaking two minutes at a Board meeting—something that is more engaging like a focus group."
- "Come and listen to them."
- "Contract with CBO's, institutions or service providers to relay information to populations. This will work much better than traditional marketing efforts. Make Clipper Cards accessible via outlets beyond Walgreens. Why not partner with libraries or community based institutions. It seems AC Transit could employ a contracts coordinator to contract local CBO's off and on to get information to populations. This is what PG&E and other utilities do. Why not AC Transit? Find a way to make fares free on Sundays the way parking is free on Sundays. Cities could be better partners in this"
- "Talk in person."
- "Because many of the events are at night when AC transit runs less frequently, the thing that I have heard most about is more regular service."
- "Better hours, early morning hours (5 a.m. to 6 a.m.). Routes that are closer to neighborhoods, not just on the main thoroughfares."
- "Buses that run more frequently, more bus routes."
- "Closer bus Stops, frequency of bus services and less cost (daily fares)."
- "Better access to information, including routes and schedules, and a more accessible web presence."
- "Convenient locations of bus stops."
- "More routes and more frequent service, especially in peak times."
- "More transportation times, better routes and reestablishing prior lines."
- "Flexibility in accommodating bicycles on board or other means, so that a rider does not get abandoned."
- "I feel AC Transit is doing an excellent job."
- "We love Flex and are so thankful for it. Add more stops throughout Castro Valley."

Finally, respondents were welcomed to give any additional suggestions for how AC Transit communicates with their populations. A number repeated suggestions and comments made earlier in the survey. Again, the in-person touch was touted most strongly.

- "Face-to-face, understanding and competent language interpreters."
- "Participating in our community events, hosting more community feedback events in Richmond."
- "Talk in person."
- "For the youth leaders, find ways to use social media and creative ways to engage them via a focus group."
- "They like in-person contact. On-site Clipper Card registration. Bring services to them, make it easier. "Having Town Hall meetings on a regular basis. Use the cities to get your information out to the masses."
- "I don't there is any communication. So announcements should be on buses, representatives should present at Neighborhood Councils and City Council Meetings."
- "Emails, flyers, and in-person interactions on our campus work best."
- "Please do more partnering with local Community Based Organizations to do your outreach."
- "Surveys for desired routes and times."

Summary

AC Transit has made use of its efforts to expand its cadre of CBOs, partnering with them more frequently to be able to speak directly with communities in the District. One-on-one contact appears to be seen as most valuable and valued by the communities these CBOs serve, with quite a few of the CBOs offering to enable such interactions. Speaking directly with community members with LEP, at fairs or meetings or as guests at organizations’ own meetings, and with the added weight of a CBO leader beside them, helps AC Transit staff ensure populations with LEP and all people within the service area are receiving the best possible service. The populations these CBOs serve are growing and, with it, so are the needs of those within the territory. Continuing to seek advice and input from and partner with the CBOs will prove beneficial to expanding AC Transit’s contact with their customers.
D. **Frequency of Contact with LEP Persons**

The DOT handbook advises for Factor 2, “Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.”

Specifically for this update, surveys were conducted with bus drivers, other employees, customer service representatives at AC Transit’s third-party call center vendor, and representatives of community-based organizations (CBOs). In addition, information on requests for language assistance that were received and use of translation on the website was also reviewed. Findings from the 2015 AC Transit Perception Survey were also reviewed for further insights into the needs of those with limited English skills.

A breakdown of the calls to the AC Transit call center that used over-the-phone (OTP) interpretation shows, not surprisingly, that the top languages are Spanish and Chinese (both Cantonese and Mandarin), followed by Vietnamese and Filipino. The data are from mid-2014 through the end of March, 2017.

**Table 17**

<table>
<thead>
<tr>
<th>Language</th>
<th>#</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>653</td>
</tr>
<tr>
<td>Cantonese</td>
<td>100</td>
</tr>
<tr>
<td>Mandarin</td>
<td>39</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>4</td>
</tr>
<tr>
<td>Filipino</td>
<td>4</td>
</tr>
<tr>
<td>Hindi</td>
<td>3</td>
</tr>
<tr>
<td>French</td>
<td>2</td>
</tr>
<tr>
<td>Arabic</td>
<td>1</td>
</tr>
<tr>
<td>Canadian French</td>
<td>1</td>
</tr>
<tr>
<td>Farsi</td>
<td>1</td>
</tr>
<tr>
<td>German</td>
<td>1</td>
</tr>
<tr>
<td>Gujarati</td>
<td>1</td>
</tr>
<tr>
<td>Japanese</td>
<td>1</td>
</tr>
<tr>
<td>Thai</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>812</strong></td>
</tr>
</tbody>
</table>

2017 AC Transit Language Assistance Plan
Of the 812 non-English language calls received in that time period, the overwhelming majority—80.4%—were made by Spanish speakers. Nearly all of the remainder, or 17.1% of all calls, were in either Cantonese or Mandarin.

**Non-English Website Use**

As part of the Title VI Plan update, Title VI staff researched the ways people use and navigate the AC Transit website (actransit.org) in languages other than English. Google Analytics provides many metrics by which to measure user behavior and demographics. Using the period July 1, 2014, through May 31, 2017, staff found that among people who have their browsers set in a language other than English, the most common languages are Chinese and Spanish, followed by French and Japanese. The majority of these users search for trip planning information, i.e. bus arrival times and bus line descriptions, like the majority of site users of any language. A substantial number of these users navigate to the “In Translation” page, either directly or from the homepage. From there, the drop-off rate—people who next leave the AC Transit website—ranges from 0% to 66% depending on the language and how direct the user’s path. It is difficult to say, based on the current information, whether drop-off rates primarily represent users finding the information they need or instead users reaching a point of frustration and giving up.

Staff also looked at the behavior of visitors to the “In Translation” page itself. The report shows that 80% of views during this period came directly from the AC Transit homepage, and 44% of viewers went directly to the homepage from the “In Translation” page without clicking anything on the page itself. While it is again difficult to draw conclusions based on this limited analysis, it seems reasonable that while the “In Translation” page is attractive to users, it may not provide all the translated information users need in its current form.

Based on this initial research, some changes are already in motion to make the website more accessible in languages other than English. Language assistance information (including simple instructions on how to use the Google Translate button) currently found on the Civil Rights page in English, Spanish, and Chinese has been made available on the In Translation page. Additionally, the Google Translate button has been moved to the top of all webpages for easier access.

AC Transit is scheduled to conduct its ridership study in 2017, updating the survey which was last conducted five years ago. Although general perceptions surveys have been conducted in the interim, the 2012 ridership study is the last one to specifically address languages spoken by its riders.

According to the 2012 Ridership survey, nearly one-third (32%) of all riders speak a language other than English at home. Table 18 shows the breakdown of those riders that speak a language other than English at home and the languages that they speak.
Table 18
What Language Other than English do you Speak at Home?*

<table>
<thead>
<tr>
<th>Language</th>
<th>Percent of Riders 2012</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>17%</td>
</tr>
<tr>
<td>Mandarin Chinese</td>
<td>3%</td>
</tr>
<tr>
<td>Cantonese Chinese</td>
<td>2%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>2%</td>
</tr>
<tr>
<td>French</td>
<td>1%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>1%</td>
</tr>
<tr>
<td>Korean</td>
<td>1%</td>
</tr>
<tr>
<td>Russian</td>
<td>**</td>
</tr>
<tr>
<td>Portuguese</td>
<td>**</td>
</tr>
<tr>
<td>All other</td>
<td>6%</td>
</tr>
</tbody>
</table>

* Multiple responses accepted
**Less than 1% of all riders

As part of the commitment to acquiring the most recent data possible, the 2017 Ridership Survey is expected to include additional questions about languages spoken at home and access to AC Transit information in their native languages.
E. IMPORTANCE OF AC TRANSIT SERVICES TO LEP PERSONS

The third step in the four-factor assessment evaluates the importance of AC Transit’s programs, activities and services to persons with limited English skills. Here, the guidance says, “The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed. The obligations to communicate rights to an LEP person who needs public transportation differ, for example, from those to provide recreational programming. A recipient needs to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual...providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, education, or access to employment.”

As the research underscores, AC Transit service is a vital means of transportation for those who do not speak English very well. In the last ridership study, one in three riders indicated they spoke a language other than English at home. Employees, CBO leaders, and riders all agree there is a need to ensure AC Transit is able to communicate with those who do not speak English very well and that the LEP community is able to successfully navigate using the system without knowing English.

Services in their own languages LEP persons have expressed taking advantage of include:

- Language assistance over the telephone;
- Google Translate button;
- Translations on website;
- Signs at bus stops and on the buses themselves;
- AC Transit’s Customer Service Center;
- Printed collateral;
- On-board vehicle announcements;
- Notices about proposed service changes, temporary service changes, and implementation of service changes;
- Title VI public notices, complaint form and procedures.

Providing critical information in languages most commonly spoken within AC Transit’s service area ensures the access of LEP riders to AC Transit service. Frequent connection with CBOs serving these populations, with LEP riders themselves, and with the District’s own employees will provide feedback on AC Transit’s success in continuing to ensure all have equal access.
F. Resources Available to the Recipient and Costs

The final step in the four-factor analysis is designed to weigh the demand for language assistance against current and projected financial and personnel resources. The DOT Guidance says, "A recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, 'reasonable steps' may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns."

Current measures and costs

Annual costs associated with the current measures to provide services and information in other languages for the last three fiscal years are shown below.

Table 18

<table>
<thead>
<tr>
<th>Vendor/Project/Department</th>
<th>FY2015</th>
<th>FY2016</th>
<th>FY2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>CTS Language Link (note 1)</td>
<td>$ -</td>
<td>$ -</td>
<td>$132.32</td>
</tr>
<tr>
<td>Accent On Languages (note 2)</td>
<td>$2,399.80</td>
<td>$12,731.46</td>
<td>$33,943.64</td>
</tr>
<tr>
<td>CHINESE JOURNAL LLC</td>
<td>$431.76</td>
<td>$ -</td>
<td>$671.92</td>
</tr>
<tr>
<td>Project 1909 (note 3)</td>
<td>$ -</td>
<td>$26,680.55</td>
<td>$7,841.41</td>
</tr>
<tr>
<td>TOTAL</td>
<td>$2,831.56</td>
<td>$39,412.01</td>
<td>$67,589.29</td>
</tr>
</tbody>
</table>

Note 1: CTS Language Link is the service used by local area staff for realtime over the phone.
Note 2: Accent on Languages is the contractor used most often for translation and interpretation. The Marketing & Communications department has a standing PO. See breakdown below of different departments that used A on L in last 3 years.
Note 3: Project 1909 is a way to record expenses if they are specific to a singular use (like a project). 1909 is not a specific project; it is more like a bucket for when specific translation service expenses are needed.

<table>
<thead>
<tr>
<th>Accent on Languages</th>
<th>FY2015</th>
<th>FY2016</th>
<th>FY2017</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>BOARD OF DIRECTORS</td>
<td>$462.80</td>
<td>$100.00</td>
<td>$100.00</td>
<td>$462.80</td>
</tr>
<tr>
<td>Customer Service Admin</td>
<td>$694.20</td>
<td>$2,314.00</td>
<td>$200.17</td>
<td>$3,208.37</td>
</tr>
<tr>
<td>DISTRICT SECRETARY</td>
<td>$150.00</td>
<td>$2,253.55</td>
<td>$2,403.55</td>
<td></td>
</tr>
<tr>
<td>Legislative Affairs &amp; Community Outreach</td>
<td>$10,267.46</td>
<td>$30,789.92</td>
<td>$41,057.38</td>
<td></td>
</tr>
<tr>
<td>Media Relations</td>
<td>$600.00</td>
<td>$600.00</td>
<td>$600.00</td>
<td></td>
</tr>
<tr>
<td>SERVICE PLANNING</td>
<td>$1,242.80</td>
<td>$1,242.80</td>
<td>$1,242.80</td>
<td>$3,730.40</td>
</tr>
<tr>
<td>TOTAL (see note)</td>
<td>$2,399.80</td>
<td>$12,731.46</td>
<td>$33,943.64</td>
<td>$49,074.90</td>
</tr>
</tbody>
</table>

It should be noted that, prior to 2016, much of the costs were not separated out, but instead were managed and spent by individual departments. It is possible that additional costs related to translation...
or interpretation were carried by specific projects under “marketing” or “public engagement” budget lines. Beginning in FY 2017, those costs were given their own code so more accurate tracking could be done. In FY 2017, the total expenditures were just under $70,000.

The majority of language assistance is provided by contractors via an over-the-phone interpretation service through the AC Transit call center, and local translation and interpretation services. The range of information accessed in native languages varies depending on the language spoken. Nearly all printed materials are available in English, Spanish, and Chinese; information on AC Transit’s website can be translated through the Google Translate button, which currently provides translations in more than 100 languages. At public meetings, interpreters can be requested in advance at no cost to speakers of any of the primary or Safe Harbor languages. LEP persons can also communicate directly with local District staff using a real-time phone interpretation service. AC Transit’s Customer Service Center employees include those who speak Spanish, Cantonese, and Tagalog. Signage on buses and at bus stops is, at a minimum, in English, Spanish, and Chinese.

AC Transit understands that reducing barriers to services and benefits of AC Transit to the extent resources are available will reap symbiotic benefits for the LEP populations as well as the District. With more LEP individuals using AC Transit, revenue will increase as well, likely making more funds available for increased language assistance programs. AC Transit management commits to devoting resources – monetary and staff time – to enhance LEP persons’ use of AC Transit programs and services.

For FY18, the budget for interpretation and translations is set to increase to $110,500, representing an increase of 63%, as shown below.

**Table 19**

| Department                        | Element                                | Note                                                                 | Amount requested |
|-----------------------------------|----------------------------------------|                                                                     | $110,500.00      |
| Marketing & Communications        | Professional and Technical Services    | FY17 was the first full year of full translations. Requested budget reflects needs based on cost from FY17. | $35,000.00       |
| Marketing & Communications        | Printing Services                      | Additional pages required to accommodate translations have added to the cost of in-house printing. | $35,000.00       |
| Accessible Services               | Professional and Technical Services    | American Sign Language - Translator for AAC Meetings. Overlap with Title VI or District Secretary | $4,500.00        |
| Legislative Affairs & Community Relations | Professional and Technical Services | BRT project might cause these costs to go up exponentially, due to street work, required to translate everything. Cost per word. | $10,000.00       |
| Compliance & Diversity Contracts  | CTS Language Link (only pay as is used), $25k translations |                                                             | $26,000          |
| **TOTALS**                        |                                        |                                                                     |                  |
|                                   |                                        |                                                                     | $110,500.00      |

Notes:
1. Starting in FY18, Departments other than Title VI have started including planning to spend funds on translation and interpretation as part of their budgets. This number includes Marketing & Communications ($35K – translations, $35K – additional printing required to accommodate translation); Accessible Services ($4.5K for ASL interpreter for ACC meetings); and Legislative Affairs & Community Relations (LACR, $10K, mostly for BRT project)
III. FOUR-FACTOR FINDINGS AND STRATEGIES

The Four-Factor analysis provides clear support for AC Transit’s approach to universal access to its services and system regardless of English language proficiency and language spoken. Among the highlights of this analysis are:

- **Factor One**: Of the nearly 1.47 million persons within AC Transit’s service territory, a total of 20.45% do not speak English very well and are considered to have limited English proficiency. Two languages – Spanish and Chinese – are the predominant languages spoken by those with LEP, accounting for nearly seven in ten of all LEP speakers. The number of languages spoken by more than 1,000 people within the service area – the DOT’s “safe harbor” designation threshold – has increased to 16 since the last update three years ago.

- **Factor Two**: The LEP community frequently uses AC Transit services, and AC Transit employees often cross paths with persons needing language assistance. About nine in ten of all employees have some level of contact with the public. More than a third of those who responded to the survey encounter people who do not speak English very well on a daily basis.

- **Factor Three**: The LEP population either uses AC Transit as its main mode of transportation or uses it at least sometimes, according to the community based organizations. Research shows that the LEP community seeks the same type of information as the community at-large, with the added imperative that the information has to be accessible in their native language(s).

- **Factor Four**: This analysis shows how AC Transit plans and budgets for the myriad activities that AC Transit currently undertakes to ensure that people who do not speak English very well are able to access the system as easily as the general population. Significant changes recommended by the last update in 2014 have been implemented to further enhance the efforts taken to ensure access for all.

LANGUAGE ASSISTANCE RECOMMENDATIONS

AC Transit supports the goal of improving LEP persons’ meaningful access to AC Transit’s services, programs, and activities. Along with enabling persons who don’t speak English very well to navigate the system with the same ease as the general population, it is necessary to provide a meaningful opportunity for LEP persons to participate in the public comment process for planning activities. Key measures AC Transit takes to do this include:

- Expansion and publicizing of over-the-phone interpretation services for use by all AC Transit staff and LEP riders
- Standards for posting documents or text online in a format which enables the content to be easily translated
- Creation of an internal interdepartmental Public Engagement Working Group to develop and advance public engagement strategy, including language assistance policy and practices
Review of data about languages spoken within the immediate geographic area of specific projects and providing language assistance as appropriate for the area
- Tracking non-English use by callers, visitors to Customer Service Center, and website
- Regular review and updating of data and the LAP as appropriate

Contained in Appendix C is a spreadsheet listing 33 recommended activities that are currently either entirely or partially in place or are ones AC Transit desires to undertake to fully support its Language Assistance Plan and corresponding Public Participation Plan. These activities are organized into four categories:

1. General, including such things as internal awareness and public outreach strategy
2. Materials and Documents
3. Translation and Interpretation Tools and Protocols
4. Employees, including training and incentives to empower employees to provide assistance

The following spells out the specific measures in greater detail.

**GENERAL**

**Title VI Internal Awareness and Training** is one of the linchpins supporting the entire Title VI program. Since the initial LAP was created in 2011, AC Transit has striven to ensure all its staff and contractors consider the needs of all constituents when undertaking any tasks, including service or fare changes, construction, etc. Reinforced communications surrounding this has engrained the awareness of those with limited English skills and the knowledge of how to access AC Transit tools to guarantee successful interactions into the District's culture.

Much progress has been made with **Public Engagement Needs And Strategies**, with the convening of the internal interdepartmental Public Engagement Working Group. This group is tasked with developing public engagement strategy and creating an internal handbook to clearly define protocols and procedures, including roles and responsibilities for all departments that interact with the public, including incorporating language assistance measures. One of these strategies is the demographic analysis of new project areas: requiring that new projects identify the attributes of the people in the geography affected (including primary languages spoken), and include strategies to reach those constituents.

In order to reduce barriers to meaningful participation in planning activities, staff conduct **Demographic Analyses of New Project Areas**, reviewing data such as primary languages spoken, income status, racial composition, etc., within the immediate geographic area of new projects. The analysis generates recommendations for language assistance measures appropriate for the specific project. Project staff check-in with Title VI staff about any recommendations prior to implementation.
AC Transit has made significant strides to provide universal language access by providing over-the-phone interpretation services, to ensure that all those with LEP have access to AC Transit’s services regardless of the language they speak. A Free Language Assistance text block advertising this service in all Safe Harbor languages has been created to add to printed documents. Also, the Elimination of English-only Campaigns commits that all future promotional/marketing or awareness campaigns include communications in Spanish and Chinese, at a minimum, to ensure participation beyond English-proficient riders.

Engagement and Communication with Community Based Organizations continues to grow since the last update in 2014. Several District departments partner with community organizations and governmental and other transit agencies as the District continues to expand the community outreach database and to identify best practices for communicating and working with CBOs, including those whose members may need language assistance. Part of continuing to Develop Relationships with CBOs includes not only communicating with them about new and existing activities but surveying CBOs after projects for feedback to assess and improve communication methods.

Contract Compliance with Title VI standards, including language assistance measures, is required. When AC Transit enters into an agreement to contract service for another agency, it is AC Transit’s intent to add into those contracts the requirement to provide any public information about that service in a way that complies with Title VI and LEP guidelines. For example, when BART contracted with AC Transit to provide late night “BART to Bus” service (which provides additional service paralleling BART’s during the hours it is shut down), the signage developed by BART was initially only in English. When the contract came up for extension, AC Transit indicated that BART must provide the publicity in their Title VI languages, particularly given that a larger percentage of riders on this survey are lower-income service workers who often also have limited English skills.

MATERIALS AND DOCUMENTS

Translation of five Vital Documents is included in the recommendations list and is existing practice. These Vital Documents include:

- **Title VI Public Notice** – Provide notice in English, Spanish, and Chinese along with Free Language Assistance text block in all Safe Harbor languages at many locations; provide English version on website that can be translated using Google Translate.

- **Title VI Complaint Form and Procedures** – Translate and provide downloadable version in all Safe Harbor languages on website and provide in printed form available on request.

- **Notice of Free Language Assistance** – Provide notice in English, Spanish, and Chinese with Free Language Assistance text block in all Safe Harbor languages on website. Include Free Language Assistance text block where possible on all printed and digital materials.

- **Legal Notices** – Offer translation into all Safe Harbor languages upon request.
- **Fare and Service Change Information** – Translate into Spanish and Chinese. Offer translation in all Safe Harbor languages upon request. For key campaigns, translate into the top predominant languages.

Other, non-Vital Documents include **Safety and Security Information**. AC Transit has incorporated pictographs to a degree to ensure understanding by all riders, particularly in case of emergency. Other opportunities to include pictographs are being considered in future material production.

**General Promotional Materials** are translated into Spanish and Chinese as funding permits and into other Safe Harbor languages as determined by demographic analysis of location or marketing reach.

**Construction, Detour, Stop Move, and Other Courtesy Notices** are translated into Spanish and Chinese when feasible and into other Safe Harbor languages as determined by analysis of location and marketing reach. An example of additional languages being added following such an analysis is the inclusion of Vietnamese translations within the BRT corridor because of the large number of Vietnamese speaking residents along the route who also have LEP. The Title VI team and Public Engagement Working Group are working to improve interdepartmental collaboration to allow sufficient time for such translations to occur.

**Website Materials** have been refined following the 2014 update to ensure all web content is provided in a form that can be translated, so persons with LEP can access all information through the use of the Google Translate button. New documents are posted in a format that works with the button, which requires uploading in original formatting or as text rather than as a scan or image because scans and images cannot be translated with the button. Since implementation of this formatting requirement, far more information on the website is now able to be translated. Staff will implement these practices into the upcoming re-design of the website.

Changes in current materials and the development of **Rider Guides and Materials** are desired. Specifically, AC Transit aims to develop rider guides in English, Spanish and Chinese, with options to provide in Safe Harbor languages. These would incorporate a greater use of illustrations and pictographs and include sources of additional information in multiple languages. Providing videos on the website and via social media, including "How to Ride" videos aimed at non-English speakers, youth, seniors, and new users in English with Spanish and Chinese versions or subtitles is also desired. Ongoing collaboration with CBOs should result in increased opportunities for distribution channels for such media.

**TRANSLATION AND INTERPRETATION TOOLS AND PROTOCOLS**

The most substantive tools and protocols are already in place, including increased use of over-the-phone interpretation services, also known as a **Language Assistance Hotline**, which is available to the Customer Call Center and throughout the District. Publicity about these services is included on the website, in all printed materials, and on the buses (via the Free Language Assistance text block), so
riders have multiple reminders of how these services can be accessed. These efforts will continue to be used and publicized to provide language assistance that is personalized to the user and language.

As mentioned, a **Budget Line Item for Translation and Interpretation** was adopted since the 2014 update to ensure the translation and interpretation requirements of the plan are met consistently across departments and projects. The added budget code facilitates budgeting and monitoring expenditures for all Departments.

The **Public Hearing Protocol** requires AC Transit to provide Spanish and Chinese interpreters, provide Safe Harbor interpreters upon request, and advertise that option in advance of the meeting. Availability of interpreters should be promoted well in advance of the meetings and in the language of provided interpretation. **Board Meeting Protocol** offers interpretation upon request within 72-hours.

When an outreach topic series of meetings is held, the **Community Meetings Protocol** requires Spanish and Chinese interpreters for at least one meeting within the outreach topic series and also requires additional Safe Harbor language interpretation upon request. Availability of interpreters is promoted well in advance of the meetings and in the language of the interpretation being provided.

**Simultaneous Interpretation Equipment** was purchased following the 2014 update. It is now on hand at public meetings to enable greater flexibility in languages used and to make it easier for persons with LEP to participate more fully.

The use of "**I Speak** Cards remains an activity AC Transit desires to undertake. These cards would be produced and distributed to all employees (including in Operators’ pouches) for emergency situations requiring language assistance. These will enable drivers to quickly keep LEP riders informed with the use of the language assistance hotline.

Another activity AC Transit aspires to create and distribute to employees is a small **Language Manual**. This would be a manual of translated common phrases used by operators and riders in using AC Transit system. This manual could, for example, phonetically spell out in different languages phrases including “This bus goes to...” and “You need to take the #X bus to go to...” and "This bus is out of service. Please wait for next bus..." etc.

The desire to use **Digital Tools or Language Technology** has increased as technology has improved. In the employee survey, the request to use translation apps was repeatedly made. The activity here is to empower and encourage all employees to use individual initiative when it comes to their use of new technology (such as the over-the-phone interpretation service or mobile apps) to communicate with persons who speak languages other than English.

While the Google Translate button has been added to all web pages since the 2014 update, there are additional things that can be done for the AC Transit website through **Website Administration and Management**. To ensure greater ease of LEP access, the design and organization of the website and mobile website can be improved. Although gains have been made in this area, further steps are needed...
to ensure that all web content is provided in formats that can be used by modern online translations tools. It is AC Transit’s hope that webpage protocols will be implemented that will allow the use of Google Analytics to understand how persons who use the Internet in languages other than English use the District website.

**EMPLOYEES**

Of the seven activities in this category, one is currently underway and the rest are under consideration. Changes in policies for those covered by collective bargaining agreements would have to be discussed as part of the CBA process. Other activities would require consideration by intra-departmental groups prior to implementation. For example, further discussions would be required prior to adding the desirability of New Employees to speak multiple languages in all new hiring, regardless of position. Any new duties or additional compensation or rights for Bilingual Employees, including, for example, providing a bidding preference that would allow bilingual drivers to sign up for routes with a high density of LEP speakers, would likely need to be discussed and agreed upon by unions and management during contract negotiations.

AC Transit has made great headway in Employee Training. The Operators User Guide is reviewed during Operator refresher training and includes information about Title VI and drivers’ responsibilities under the Civil Rights Act.

Since the last LAP update, Title VI staff have developed and conducted a number of trainings:

- Civil rights – Title VI, EJ, and language assistance – training for managers and above; attended by 84 staff including all members of Executive Staff and Department heads.
- LanguageLink (over the phone interpretation service) training for public-facing employees; including 56 office and outreach staff and 57 road supervisors. Additional trainings are being conducted for new employees and those who missed the first rounds of training.
- Targeted Title VI compliance training for Operators of demand-response (“Flex”) pilot project
- Title VI considerations for public outreach campaigns for Planning staff

In November 2016, AC Transit hosted the National Transit Institute (NTI) course, Public Involvement in Transportation Decisionmaking. As host, the District had 10 seats, which were filled with the Title VI Coordinator and staff from the Capital Projects, Marketing and Communications, Legislative Affairs and Community Relations, Planning, and East Bay Bus Rapid Transit departments.

In addition, the Title VI coordinator attended a number of trainings to expand professional capacity and to support understanding of Title VI issues in various projects, including DOT, NTI, and FTA courses, workshops, webinars and symposia. She also participated in regional Title VI- and data-focused meetings and attended the APTA Bus & Paratransit conference.

Going forward, AC Transit aims to provide Title VI training as part of new-employee orientation and to other staff. In addition to introducing general Title VI concepts, such training provides information
about language assistance measures and how to access them. Training will continue for staff involved in planning and marketing of new activities and projects to integrate consideration of Title VI-protected populations into planning.

**Training for Title VI-Related Complaints** is another important activity. The District desires to provide assistant superintendents with additional diversity training and assistance, to enable enhanced counseling with drivers found to have violated Title VI procedures following customer complaints related to language proficiency. This would require all such drivers to go through "refresher" diversity training.

The concept of an **Employee Ambassador Program** flows from direct input from employees. An ambassador program would be created using AC Transit employee volunteers who represent various LEP and other traditionally underrepresented populations. Ambassadors could attend meetings at appropriate CBOs to talk about AC Transit, how to ride and where to get information, and to get feedback from riders about issues they encounter. Ambassadors' skills could be used in-house as well, serving as a reviewer of translated District materials to ensure proper translations and to provide on-demand interpretation in the event of an emergency. Compensation for employee ambassadors would have to be considered.

AC Transit is considering creating and distributing **I speak...** **Buttons** to all volunteer employees who speak multiple languages, including the employee ambassadors, as suggested by employees as well as some in the LEP community.

The final activity AC Transit is considering is promoting the availability of **Employee Tuition Assistance** to all employees and encouraging them to learn primary languages in the AC Transit service area.
IV. Language Assistance Plan

AC Transit’s Language Assistance Plan is the District’s implementation plan for assuring that their services and programs are accessible to those who may not speak English very well. According to the DOT’s guidance, “recipients have considerable flexibility in developing a Language Assistance Plan, or LEP Plan. An LEP Plan shall, at a minimum: (a) Include the results of the Four-Factor Analysis, including a description of the LEP population(s) served; (b) Describe how the recipient provides language assistance services by language; (c) Describe how the recipient provides notice to LEP persons about the availability of language assistance; (d) Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.” (e) Describe how the recipient monitors, evaluates and updates the language access plan;

DESCRIPTION OF THE LEP POPULATIONS SERVED

As detailed elsewhere, using a variety of data sources, AC Transit identified and grouped the LEP populations into two categories:

- Primary: The two languages that are spoken in the heaviest concentrations in the District (Spanish and Chinese)
- Safe Harbor: The 14 additional languages meeting the safe harbor definition (Vietnamese, Tagalog, Korean, Hindi, Persian, Arabic, Arabic, Portuguese or Portuguese Creole, Russian, Mon-Khmer/Cambodian, Gujarati, Laotian, French (including Patois and Cajun), and Urdu).

Of the nearly 1.47 million persons within AC Transit’s service territory, a total of more than 301,000, or 20.45%, do not speak English very well and are considered to have limited English proficiency. Spanish and Chinese remain the two predominant languages spoken by those with LEP, accounting for nearly seven in ten of all LEP speakers. Spanish speakers alone account for 44% of service territory residents who do not speak English very well (132,666). The number of Chinese speakers is 73,657.

LANGUAGE ASSISTANCE SERVICES PROVIDED

The Factor Four analysis generated an extensive list underscoring AC Transit’s continued commitment to ensuring people who do not speak English very well are able to access the District’s information and services. AC Transit successfully achieves this by:

- Providing translators for at least one meeting during an outreach cycle and at all public hearings;
- For all new projects, identifying attributes of the people in the geography affected (i.e., primary languages spoken, income status) and using strategies to reach those constituents;
- Having language assistance service available through the AC Transit call center and training public-facing employees in the use of LanguageLink (over the phone interpretation service);
- Including the Google Translate button on all possible pages on the District website;
- Hiring bilingual employees for its Customer Service Center;
• Working with CBOs to extend outreach to LEP populations;
• Conducting primary research in English, Spanish, and Chinese to address changes in needs;
• Eliminating all English-only campaigns, whenever AC Transit teams with other entities, just as it has eliminated its own use of English-only information.

The spreadsheet of LEP recommended activities includes both current actions, some of which are described above, as well as potential measures AC Transit is considering undertaking. Some of the tasks we hope to carry out include:

• Working with CBOs to develop, produce, and publicize new content such as “How to Ride” videos and brochures;
• Enabling successful translation of documents into more than 100 Google Translate languages by posting documents or text which can be interpreted by the button;
• Increasing the use of pictographs to assist both the LEP population and others with limited education;
• Expanding the promotion of the over-the-phone interpretation service both internally and externally, increasing its use;
• Strongly encouraging all employees to use individual initiative to use new technology (such as Language Link or mobile apps) to communicate with persons who speak languages other than English;
• Further enhancing website administration and management, including the mobile website.

NOTICE TO LEP PERSONS ABOUT AVAILABILITY OF LANGUAGE ASSISTANCE

For this task, federal guidance states, “vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services.”

Two primary languages were identified through the four-factor analysis: Spanish and Chinese. Safe Harbor languages for vital document translation (in addition to the two primary languages) are Vietnamese, Tagalog, Korean, Hindi, Persian, Arabic, Arabic, Portuguese or Portuguese Creole, Russian, Mon-Khmer/Cambodian, Gujarati, Laotian, French (including Patois and Cajun), and Urdu.

The table below lists both vital and non-vital documents, categories of documents, and identifies the language category into which they should be translated. As it has done in the past, AC Transit may provide a summary of a vital document and/or notice of free language assistance for the “Safe Harbor” languages, rather than a word-for-word translation of the vital document.

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2 FTA Circular 4702.1B
As it has also done in the past, AC Transit is not limiting itself to these guidelines, intending to translate documents into more languages as circumstances dictate and resources allow. For example, based on the demographics of the BRT route, notices are translated into Vietnamese as well as Spanish and Chinese and communicated to residents and business owners in the vicinity of the project, alerting them to the construction and detour details. As necessary, AC Transit may also rely on pictographs to communicate information regardless of language spoken.

Table 20: Vital and Non-Vital Document List

<table>
<thead>
<tr>
<th>Document</th>
<th>Languages</th>
<th>Vital Document?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title VI Public Notice</td>
<td>All Safe Harbor Languages</td>
<td>Yes</td>
</tr>
<tr>
<td>Title VI Complaint Form and Procedures</td>
<td>All Safe Harbor Languages</td>
<td>Yes</td>
</tr>
<tr>
<td>Notice of Free Language Assistance</td>
<td>All Safe Harbor Languages</td>
<td>Yes</td>
</tr>
<tr>
<td>Legal Notices</td>
<td>All Safe Harbor Languages</td>
<td>Yes</td>
</tr>
<tr>
<td>Safety and Security Information</td>
<td>Use of Pictographs</td>
<td>Depends on subject matter</td>
</tr>
<tr>
<td>Fare &amp; Service Change Information</td>
<td>Primary and Secondary</td>
<td>Yes</td>
</tr>
<tr>
<td>General Promotional Materials</td>
<td>Primary, plus Secondary Languages as funding permits &amp; as determined by location</td>
<td>No</td>
</tr>
<tr>
<td>Construction &amp; other Courtesy Notices</td>
<td>As determined by location</td>
<td>No</td>
</tr>
</tbody>
</table>

To ensure LEP persons are aware of the existing and new language assistance, AC Transit will continue or begin:

- Posting a notice of the availability of language assistance in safe harbor languages on vital documents;
- Inserting language assistance notification on the AC Transit website, in its Customer Service Center, and in promotional materials promoting LanguageLink;
- Including the Free Language Assistance text block on all appropriate materials as possible (including all public hearing notices, fare and service change information notices, Title VI notices, and complaint forms)
TRAINING STAFF TO PROVIDE TIMELY AND REASONABLE LANGUAGE ASSISTANCE

This final task in the creation of the LAP describes how AC Transit trains employees to provide “timely and reasonable language assistance to LEP populations.” Following the 2014 update, AC Transit took additional efforts to ensure that District employees understood how to provide language assistance for their customers as well as the importance of federal Title VI requirements. Training materials, which all bus drivers receive on an annual basis, were updated to include information relating to Title VI and interactions with LEP riders. Customer Call Center employees, who are reached by calling into the regional 511 telephone information system or by calling AC Transit directly, receive training about both language assistance measures as well as the protocol for Title VI complaints. Additional training has been conducted with AC Transit staff to inform them of AC Transit’s responsibilities under the DOT LEP Guidance.

As described above, since the last Program update Title VI staff developed and conducted a number of trainings, and also attended trainings to improve professional capacity, relative to civil rights, Title VI, environmental justice, and issues related to limited English proficiency. The District hosted – and staff from several departments attended – the NTI’s Public Involvement in Transportation Decisionmaking course.

Although not training directly, there are a number of low- or no-cost human resource activities under consideration that could expand AC Transit’s ability to ensure access by people with limited English proficiency. These include:

- **Conduct focus group interviews to help identify what language skills employees have, how they might use them, what activities they might best enjoy or be good at, what compensation they might expect for using those skills, etc.** Such focus groups should include Union leadership, Executive staff, employees who’ve volunteered these skills in the past, etc.
- **Survey how other transit agencies utilize employees’ non-English skills and compensate them for it.**
- **Propose practices to utilize AC Transit employees’ existing skills.** These might include identifying a cadre of volunteers who would occasionally proofread/check professionally translated materials, recommend whether to require certification and how to pay for employees’ time and effort when those skills are used. Also, consider developing printed materials for employees with some non-English language skills to communicate better, and consider pay for training for employees that wanted to increase their language skills.
- **Add non-English language skills as a desired qualification in recruitment efforts.** While it would take a bit of time to identify appropriate positions requiring language skills (and determining appropriate compensation for such additional skill), it should be fairly easy to include this as a desired qualification for any position involving public-facing activities. It might be necessary (or good practice) to memorialize this desire in particular job specs or in Human Resource department recruiting guidelines to ensure this approach is considered in recruitment efforts.
Consider requiring non-English or bilingual skills for new employees; of course, changes to any job specifications will have to be part of the contract negotiating process for Union positions; this process should look at whether this is a reasonable requirement and for which jobs.

**MONITORING, EVALUATING, AND UPDATING THE LAP**

AC Transit commits to continuing to adjust its activities to improve its communications with LEP persons and facilitate their use of the District’s services and programs. Steps to monitor, evaluate and update the plan include:

- On a triennial basis, AC Transit will review and update Census and other data (California Department of Education, ridership surveys, etc.) and update its LAP as appropriate.
- Whenever public meetings are being held, AC Transit staff will review existing data on potential primary and Safe Harbor language usage within the immediate geographic area and seek to provide translation services as appropriate for the area.
- Periodically, AC Transit will solicit feedback about its language assistance performance from employees and CBOs who provide services to LEP persons.
- AC Transit will also conduct periodic on-board surveys, with language-appropriate instruments, to gauge LEP persons’ opinions and usage of AC Transit services and programs.
- AC Transit will annually track the number of calls, noting the language of each, made using its language assistance hotline.
- AC Transit will annually track the number of LEP persons requesting assistance at its Customer Service Center.
- AC Transit will annually review the accessibility of its Vital Documents (and other documents). New documents will be translated and posted on the website.
- As part of its public engagement needs and strategies practices, AC Transit staff will review the goals of all new projects as a means of overseeing staffs’ understanding of the LEP needs in the geographic area of the new project.
- The Title VI budget also includes monies for a “secret shopper” program similar to the one various transit agencies use to assess performance. For example, LA Metro contracts with a local non-profit organization to ride buses, call customer service, and even approach janitors in stations, to see how employees interact with a person who doesn’t speak English very well. Such a project could be used to help identify what types of additional language assistance training might be implemented and for what employee groups.
APPENDIX A: Surveys

- AC Transit Internal Staff
- Driver
- Call Center
- Community Based Organization
Study Name: AC Transit Internal

Thank you for taking the time to complete this brief survey. Your input will help AC Transit assess the needs of all passengers, including those who don’t speak English very well.

This survey information will be used as we prepare our Public Participation Plan, Language Assistance Plan and Title VI Program Update as required by the U.S. Department of Transportation.

Thank you for giving us your input.

==========================
Question Name: Q1
First, we would like to discuss all riders/members of the public you encounter. In a typical day, do you encounter riders/members of the public?
1 Yes
2 No

==========================
Question Name: Q2
Over the course of a year, do you interact with riders/members of the public?
1 Yes
2 No

==========================
Question Name: Q3
In a typical day, how many riders/members of the public do you interact with? (Please give your best guess as a number)

==========================
Question Name: Q4
What subject of services or information are these riders/members of the public typically seeking? (Please check all that apply)
1 Routes/wayfinding
2 Schedules
3 Fares
4 Complaints/commendations
5 Crime/security
6 Accidents
7 ADA/accessibility for the disabled
8 Discrimination
9 Bus conditions (broken equipment, cleanliness, etc.)
10 Public information (hearings, board meetings, etc.)
11 Service changes/detours
12 Other [Respondent Specify]
13 I don't know [Exclusive]

Question Name: Q5
Consider the riders/members of the public you encounter who do not communicate well in English. What percentage of all riders/members of the public you encounter would you estimate are unable to communicate well in English? (Please give your best guess as a percentage)

Question Name: Q6
How often do you typically encounter riders/members of the public seeking assistance who are unable to communicate well in English?
1 Many times a day
2 A few times a day
3 A few times a week
4 A few times a month
5 Less than once a month
6 Rarely or never

Question Name: Q7
What subject of services or information were these riders/members of the public who do not communicate well in English typically seeking? (Please check all that apply)
1 Routes/wayfinding
2 Schedules
3 Fares
4 Complaints/commendations
5 Crime/security
6 Accidents
7 ADA/accessibility for the disabled
8 Discrimination
9 Bus conditions (broken equipment, cleanliness, etc.)
10 Public information (hearings, board meetings, etc.)
11 Service changes/detours
12 Other [Respondent Specify]
13 I don't know [Exclusive]

Question Name: Q8
Which of these languages do you recognize as being commonly used by limited-English-speaking riders/members of the public you encounter? (Please check all that apply)
Question Name: Q9
Which languages are most of your limited-English-speaking riders/members of the public speaking? (Please check up to three)
1. Spanish
2. Chinese (including Mandarin, Cantonese)
3. Tagalog (Filipino)
4. Vietnamese
5. Korean
6. Other languages (please specify) [Respondent Specify]
7. I do not recognize any languages [Exclusive]
8. Not applicable [Exclusive]

Question Name: Q10
Can you speak well in any languages other than English?
1. Yes
2. No

Question Name: Q11
What other languages can you speak well? (Please check all that apply)
1. Spanish
2. Chinese (including Mandarin, Cantonese)
3. Tagalog (Filipino)
4. Vietnamese
5. Korean
6. Other languages (please specify) [Respondent Specify]
7. Not applicable [Exclusive]
Question Name: Q12
What training, assistance and/or tools could AC Transit give employees to help them assist people who don't speak English well, are from other countries, don't have much education, etc.?

Question Name: Q13
In order to improve communications with all riders/members of the public, which of the following do you think AC Transit should focus its efforts? (Please check up to three)
1. Signs and information in different languages
2. More bilingual employees
3. Access to in-house translators through a telephone language line
4. Social media (Facebook, Twitter, etc.)
5. Voice recognition apps for smartphones
6. Community meetings
7. Advertising
8. Employees wearing “I speak...” buttons indicating other languages they speak
9. Providing employees with manuals containing common terms and phrases in other languages
10. More customer service information
11. Website
12. Other [Respondent Specify]
13. I don't know [Exclusive]

Question Name: Q14
What is your department?

Question Name: Q16
In case we have follow-up questions, please provide your name, email address and phone number. This is optional.
Study Name: AC Transit Drivers

Thank you for taking the time to complete this brief survey. Your input will help AC Transit assess the needs of all passengers, including those who don’t speak English very well.

This survey information will be used as we prepare our Public Participation Plan, Language Assistance Plan and Title VI Program Update as required by the U.S. Department of Transportation.

Thank you for giving us your input.

Question Name: Q1
First, we would like to discuss all riders/members of the public you encounter. In a typical day, how many riders/members of the public do you interact with? (Please give your best guess as a number)

Question Name: Q2
What subject of services or information are these riders/members of the public typically seeking? (Please check all that apply)
1 Routes/wayfinding
2 Schedules
3 Fares
4 Complaints/commendations
5 Crime/security
6 Accidents
7 ADA/accessibility for the disabled
8 Discrimination
9 Bus conditions (broken equipment, cleanliness, etc.)
10 Public information (hearings, board meetings, etc.)
11 Service changes/detours
12 Other [Respondent Specify]
13 I don’t know [Exclusive]

Question Name: Q3
Consider the riders/members of the public you encounter who do not communicate well in English. What percentage of all riders/members of the public you encounter would you estimate are unable to communicate well in English? (Please give your best guess as a percentage)
Question Name: Q4
How often do you typically encounter riders/members of the public seeking assistance who are unable to communicate well in English?
1 Many times a day
2 A few times a day
3 A few times a week
4 A few times a month
5 Less than once a month
6 Rarely or never

Question Name: Q5
What subject of services or information were these riders/members of the public who do not communicate well in English typically seeking? (Please check all that apply)
1 Routes/wayfinding
2 Schedules
3 Fares
4 Complaints/commendations
5 Crime/security
6 Accidents
7 ADA/accessibility for the disabled
8 Discrimination
9 Bus conditions (broken equipment, cleanliness, etc.)
10 Public information (hearings, board meetings, etc.)
11 Service changes/detours
12 Other [Respondent Specify]
13 I don’t know [Exclusive]

Question Name: Q6
Which of these languages do you recognize as being commonly used by limited-English-speaking riders/members of the public you encounter? (Please check all that apply)
1 Spanish
2 Chinese (including Mandarin, Cantonese)
3 Tagalog (Filipino)
4 Vietnamese
5 Korean
6 Other languages (please specify) [Respondent Specify]
7 I do not recognize any languages [Exclusive]
8 Not applicable [Exclusive]
Question Name: Q7
Which languages are most of your limited-English-speaking riders/members of the public speaking? (Please check up to three)
1. Spanish
2. Chinese (including Mandarin, Cantonese)
3. Tagalog (Filipino)
4. Vietnamese
5. Korean
6. Other languages (please specify) [Respondent Specify]
7. I do not recognize any languages [Exclusive]
8. Not applicable [Exclusive]

Question Name: Q8
Can you speak well in any languages other than English?
1. Yes
2. No

Question Name: Q9
What other languages can you speak well? (Please check all that apply)
1. Spanish
2. Chinese (including Mandarin, Cantonese)
3. Tagalog (Filipino)
4. Vietnamese
5. Korean
6. Other languages (please specify) [Respondent Specify]
7. Not applicable [Exclusive]

Question Name: Q10
What training, assistance and/or tools could AC Transit give employees to help them assist people who don’t speak English well, are from other countries, don’t have much education, etc.?

Question Name: Q11
In order to improve communications with all riders/members of the public, which of the following do you think AC Transit should focus its efforts? (Please check up to three)
1. Signs and information in different languages
2. More bilingual employees
3. Access to in-house translators through a telephone language line
4 Social media (Facebook, Twitter, etc.)
5 Voice recognition apps for smartphones
6 Community meetings
7 Advertising
8 Employees wearing “I speak...” buttons indicating other languages they speak
9 Providing employees with manuals containing common terms and phrases in other languages
10 More customer service information
11 Website
12 Other [Respondent Specify]
13 I don’t know [Exclusive]

Question Name: Q12
What is your division?

Question Name: Q13
What line(s) are you currently driving? (Please list up to three)

Question Name: Q14
In case we have follow-up questions, please provide your name, email address and phone number. This is optional.
Study Name: AC Transit Call Center

Thank you for taking the time to complete this brief survey. Your input will help AC Transit assess the needs of all passengers, including those who don’t speak English very well.

This survey information will be used as we prepare our Public Participation Plan, Language Assistance Plan and Title VI Program Update as required by the U.S. Department of Transportation.

Thank you for giving us your input.

Question Name: Q1
First, we would like to discuss all riders/members of the public you encounter. In a typical day, how many riders/members of the public do you interact with? (Please give your best guess as a number)

Question Name: Q2
What subject of services or information are these riders/members of the public typically seeking? (Please check all that apply)
1. Routes/wayfinding
2. Schedules
3. Fares
4. Complaints/commendations
5. Crime/security
6. Accidents
7. ADA/accessibility for the disabled
8. Discrimination
9. Bus conditions (broken equipment, cleanliness, etc.)
10. Public information (hearings, board meetings, etc.)
11. Service changes/detours
12. Other [Respondent Specify]
13. I don’t know [Exclusive]

Question Name: Q3
Consider the riders/members of the public you encounter who do not communicate well in English. What percentage of all riders/members of the public you encounter would you estimate are unable to communicate well in English? (Please give your best guess as a percentage)

Question Name: Q4
How often do you <b>typically</b> encounter riders/members of the public seeking assistance who are unable to communicate well in English?
1. Many times a day
2 A few times a day
3 A few times a week
4 A few times a month
5 Less than once a month
6 Rarely or never

Question Name: Q5
What subject of services or information were these riders/members of the public who do not communicate well in English seeking? (Please check all that apply)
1 Routes/wayfinding
2 Schedules
3 Fares
4 Complaints/commendations
5 Crime/security
6 Accidents
7 ADA/accessibility for the disabled
8 Discrimination
9 Bus conditions (broken equipment, cleanliness, etc.)
10 Public information (hearings, board meetings, etc.)
11 Service changes/detours
12 Other [Respondent Specify]
13 I don't know [Exclusive]

Question Name: Q6
Which of these languages do you recognize as being commonly used by limited-English-speaking riders/members of the public you encounter? (Please check all that apply)
1 Spanish
2 Chinese (including Mandarin, Cantonese)
3 Tagalog (Filipino)
4 Vietnamese
5 Korean
6 Other languages (please specify) [Respondent Specify]
7 I do not recognize any languages [Exclusive]
8 Not applicable [Exclusive]

Question Name: Q7
Which languages are most of your limited-English-speaking riders/members of the public speaking? (Please check up to three)
1. Spanish
2. Chinese (including Mandarin, Cantonese)
3. Tagalog (Filipino)
4. Vietnamese
5. Korean
6. Other languages (please specify) [Respondent Specify]
7. I do not recognize any languages [Exclusive]
8. Not applicable [Exclusive]

Question Name: Q8
Can you speak well in any languages other than English?
1. Yes
2. No

Question Name: Q9
What other languages can you speak well? (Please check all that apply)
1. Spanish
2. Chinese (including Mandarin, Cantonese)
3. Tagalog (Filipino)
4. Vietnamese
5. Korean
6. Other languages (please specify) [Respondent Specify]
7. Not applicable [Exclusive]

Question Name: Q10
What training, assistance and/or tools could AC Transit give call center employees to help them assist people who don’t speak English well, are from other countries, don’t have much education, etc.?

Question Name: Q11
In case we have follow-up questions, please provide your name, email address and phone number. This is optional.
Study Name: AC Transit CBO Survey

This survey is part of the work AC Transit is doing as it updates its Civil Rights (Title VI) program. The survey is designed to include people representing non-profit organizations, such as those providing social services, immigration or legal information, or health care, as well as fellow governmental agencies and educational and business organizations.

The survey should take no more than 10 minutes to complete. We know your time is valuable, but we are really in need of your ideas about the needs of the communities we all serve and how AC Transit is performing and where it can improve.

Thank you in advance for completing this online survey. If your organization serves people outside of Alameda and Contra Costa counties, please try to respond in terms of only those who live in the East Bay.

Question Name: Q1
Within the East Bay – Alameda and Contra Costa counties – about how many people does your agency or organization provide services to or advocate on behalf of?

Question Name: Q2
Has the size of the population you serve increased, stayed the same or decreased over the past three years?
1 Increased
2 Stayed the same
3 Decreased

Question Name: Q3
What are the top countries of origin of the population you serve?

Question Name: Q4
What are the three primary languages spoken by the population you serve? (Please select no more than three.)
1 English
2 Spanish
3 Chinese (including Mandarin, Cantonese)
4 Tagalog (Filipino)
5 Vietnamese
6 Korean
7 Other languages (please specify) [Respondent Specify]
Question Name: Q5
What age groups do you serve? (Please check all that apply.)
1  Youth (under the age of 17)
2  Adults (18-64)
3  Seniors (65 and older)

Question Name: Q6
How would you assess the literacy level of the population you serve in the native language? In other words, how well can they read in their native language?
1  Below basic
2  Basic
3  Intermediate
4  Proficient
5  Not sure

Question Name: Q7
How well do they read in English?
1  Below basic
2  Basic
3  Intermediate
4  Proficient
5  Not sure

Question Name: Q8
Focusing on your population’s use of AC Transit, to what degree do they rely upon AC Transit for their transportation? Would you say the population: (Please select one)
1  Relies on AC Transit for their main transportation
2  Relies on other public transit for their main transportation
3  Does not rely on public transit, but uses AC Transit sometimes
4  Doesn’t use public transit
5  I’m not sure [Exclusive]

Question Name: Q9
Does the population you serve regularly inquire about how to access public transportation or express a need for public transportation service?
1  Yes
2  No
Question Name: Q10
What difficulties does this population have in using the public transportation system? (Please be as specific as possible)

Question Name: Q11
What is the best way to obtain input from the population in order to better serve them? (Please be as specific as possible.)

Question Name: Q12
What two or three things do you think this population needs from AC Transit to be better served? (Please be as specific as possible)

Question Name: Q13
What suggestions, if any, do you have for AC Transit when it comes to communicating with your population?

Question Name: Q14
What is the name of your organization?

Question Name: Q15
Which category best describes your organization?

1 Academic
2 Business
3 Government
4 Health
5 Housing
6 Immigration
7 Library
8 Legal
9 Neighborhood Group
10 Other Nonprofit Organization (please specify type) [Respondent Specify]
11 Political Organization
12 Religious
13 Senior Services
14 Social Services
15 Transit
16 Other [Respondent Specify]
APPENDIX B: Survey Verbatim Responses

- Languages/ class.
- Simple conversation paper that converts English into other languages. Example: The fare, greetings and to take a seat for safety. Or provide second language classes for employees.
- I use the language link service provided by AC Transit and I use the language translator on my smart phone.
- Provide them with location of local book stores that have small translation dictionaries. A word-for-word translation book and a "Commonly Used Phrases" book with translations was vital to me when I was living in Germany for three years. We should be encouraging the public to take the initiative to learn the English language. While this opinion won't sit well with many, it is really the only way foreigners will truly become adept at functioning and becoming a part of the culture.
- Send us back to school to learn different languages.
- Send us to school.
- Signs on buses/in shelters in different languages. Brochures that have simple pictures to tell information. More training about what help is available for us to use for communication. Free phone number we can give riders with translators available.
- Translation device.
- Translators.
- Electronic device that can be spoken into and translated to us and in reverse.
- I don't think there is much anyone can do to help those people. There are no tools that exist that can help those who are uneducated, ignorant, or unwilling to learn English. Those are qualities only those individuals can change for themselves.
- Basic statements in different languages to point to people.
- A sign stating the fare, end of the line, out of service, etc.
- Spanish refresher course focused on AC Transit's service related terminology will help me. Also, it will be great if AC Transit provided a small card with language assistance info. I could give away those cards as I come across with people who are needing assistance in languages other than English.
- Training sessions involving scenarios and how to best handle frequent situations.
- Provide basic Spanish language classes.
- Encourage staff to take classes to learn another language so they can communicate better.
- Referral to language translation services phone numbers.
- How to explain why a bus is a no-show, how to ensure that next bus will be coming and how soon will be coming.
- Provide employees who frequently interact with people who do not speak English with training and a translation app for smartphones. This will assist our employees to understand our customer's need and better guide them to a solution.
- Training on how to obtain translation assistance.
- How to greet a member of the public and point to a sign that contains symbols for the information they want.
- Set up a help line for Chinese speaking only.
- Interpreter call-in line.
- Flash cards with information about who to call for assistance.
- None. Let the foreigners assimilate.
- Basic phrases in the languages they may encounter as well as cards with FAQs in a variety of languages they can hand to a customer.
- Ipad with app translator. Use iphone app for translation.
- Language classes.
- Maybe offer Spanish classes.
- They could offer a pay differential to employees that are proficient in other languages. We already have language line, which is helpful.
- We are trained to use Language Link.
- Incentives for language training for operators.
- Tool that could teach basic phrases that are commonly used.
- Head signs on the coaches in various languages.
- An interactive website that switches into the most common languages we encounter.
- As I indicated, I don’t encounter non-English speaking public very often. However, it might be helpful to have language "flash cards" with clear graphics covering some of the common topics that the non-English-speaking public may need to know. These may be especially helpful for drivers. I am not a driver so drivers should really decide if flash cards would be helpful.
- Having a department where translation can be provided.
- (Cards) voice in Chinese saying each stop.
- Placards w/pictures.
- Some speaking languages class.
- Some languages classes.
- I ask other passengers who speaks their language to see if they understand the language.
- A training course in different languages.
- Language Link.
- Basic Spanish and Chinese classes.
- Instruction in the use of Language Link.
- Outside of the translator service, Google translate helps. Having cue cards or an app with common phrases in transit that can be used when encountering passengers with limited English skills would help.
- A translator is used to translate for the individuals that don't speak English well. We also have staff that are bilingual in both Spanish and English to assist if needed.
- Patience.
- Bilingual information about routes and schedules, in hard copy and on-line form.
- I think AC Transit does a lot to help non-English speakers, but we can do more. Used the correct way to translate from Spanish to English.
- Some basic language speaking classes in other languages.
- Some way to translate what they are saying.
- Install an App to translate their language, for instances Siri's.
- Teach us about things like how to create a message that can be put through Google translate and come out easily. Also how we can communicate in ways that don't require speaking a common language (the pamphlets w/16 languages about calling customer support, pointing in the right direction, using maps, etc.).
- Safety messaging in picture format to sit down while riding.
- I prefer that bus operators have printed materials available with words/phrases in other languages instead of technology based for this reason: it is against District policy to use electronic devices when operating District vehicles. Not all customers have access to smartphones and social media platforms.
- Language classes, to convey our basic information about services.
- Offer classes that will help the employees learn some basics in other languages, to at least be able to answer simple questions regarding the service we provide.
- Google Translate app, asking other coworkers.
- Respecting other language speaking cultures and exercising extreme patience with them.
- Continue to post signs to help communicate and announcements/voice communications made in other languages. Often times I'll assist by finding someone that speaks the same language to help communicate.
- Make info in all* other languages, (schedules, service changes, etc.).
- Other language classes.
- Multi-language overhead announcements.
- Ask other passengers who speak the language to help me out.
- Phrase cards, Google translate.
- As drivers, we can take classes to learn other languages and AC Transit can help the drivers who want to learn the languages.
- Simple visual aids. Help me, as a driver, learn simple phrases in other languages. “Good morning. What is your destination?” Other phrases.
- More signs.
- Give free class on other languages.
- Train us to read pamphlet to general questions.
- Foreign language classes.
- Train drivers on 2nd language.
- Teach other languages to employees.
- Put more schedules in other languages.
- Learn a little bit of other languages.
- 18 pamphlets in their languages on schedules or posters of info on the coaches for their languages, directing them in their travels.
- Have more bilingual hires, also give more pay for using 2nd language.
- Signs and information in different languages.
- I'll use my cellphone but not while I'm driving.
- Online translation class.
- Voice apps for smartphone.
- Pamphlets.
- We have a lot of riders in Fremont who are deaf and/or blind. I think they should be on this list.
- Bilingual operators.
- Training (basic) in languages.
- Classes / Books / DVD / CD.
- Give sign language classes and Spanish classes.
- Offer training to be bilingual.
- They should offer classes on site for those who are interested.
- Google Translate (touchscreen or tablet).
- Other languages classes, the basics. Translation card (from English to Spanish or vice versa, etc.), smartphone apps.
- Incentive for second language training.
- I think it’s good the way we have it.
- Have an employees that speak that language and we can transfer them to that employee.
- We have access to Interpretalk to help with those people that don't speak English to help then just as well as we can help those who speak English.
- When a customer calls into AC Transit they are given the option to select a language. This makes the caller think they are being connected to someone that speaks their language. It would be better to have the phone prompter explain in their language that we do not speak their language but will get a translator.
- Nothing really we have a program called Interpretalk that is very helpful.
- Maybe hire in building Spanish speakers to assist with callers.
- Language courses possibly.
- They could have a training class for the employees that could help us learn these different languages, or have people that already speak these languages take those calls.
- Most ACT riders complain that unless they are calling the Customer Relation line that they are not able to speak with anyone else because there is no translator. Also, customers don’t realize that Customer Relations has an option for a translator so I feel that half of them don’t call.
- We need maps of the routes IN ADDITION TO the stops. Stops don’t mean anything to those of us in Iowa who are NOT familiar with the entire Bay Area. Seeing a map would help immensely in answering all kinds of questions.
- 1. Descriptive pictures to relay actions, direction or information visually 2. AC Transit app that includes a language translator 2a. AC Transit app that issues route changes, delays or emergency notices directly to persons that sign up to receive them, with the ability to be translated into a variety of languages.
- I could get around on public transportation when I was in Japan (USMC), but I cannot here. Perhaps looking into their ring system (it identifies locations with patterned rings) may help our processes. Help the customer.
- Maintain an active list of multi-lingual District employees who are willing to assist in any translation needs. If assistance is needed any worker would pull out the list and see who’s available to help based on the language spoken and proximity. IS department could possible come up with the infrastructure (web site or application) to support all this.
- Training on how to offer assistance during these situations to best help the public when necessary.
- Provide them with documentation in their languages to help them understand.
- Educate AC Transit upper management to deal with employees with respect and treat them equal.
<table>
<thead>
<tr>
<th>Activity</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Intergrate Title VI awareness into all activities and the general awareness base of the district.</td>
<td>Training and Awareness</td>
</tr>
<tr>
<td>Existing</td>
<td>Practice</td>
</tr>
<tr>
<td>Incorporating Language Assistance Measures, including the need for and methods of providing Language Assistance.</td>
<td>Needs and Strategies</td>
</tr>
<tr>
<td>Internal/Interdepartmental Public Engagement Working Group developing public engagement materials and strategies, and writing internal handbook to clarify where protocols and procedures include Language Assistance.</td>
<td>Public Engagement</td>
</tr>
<tr>
<td>Project team Project Charter process.</td>
<td>Demographic Analysis</td>
</tr>
<tr>
<td>Training Language Exposure with the people in the Geography affected (i.e., Primary)</td>
<td>Demographic Analysis</td>
</tr>
<tr>
<td>Ongoing communication with community organizations, especially those whose members may need language assistance.</td>
<td>Communications Development and Engagement</td>
</tr>
<tr>
<td>Continue to work with CBOs.</td>
<td>Develop Relationships</td>
</tr>
<tr>
<td>Feedback to assess and improve communication methods.</td>
<td></td>
</tr>
</tbody>
</table>
### 2017 AC Transit Language Assistance Plan

<table>
<thead>
<tr>
<th>X</th>
<th>Language Assistance Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>Develop free aids in English, Spanish, and Chinese, with options to provide in other languages.</td>
</tr>
<tr>
<td>X</td>
<td>Use of pictures and graphics as much as possible.</td>
</tr>
<tr>
<td>X</td>
<td>Post key information and obvious next steps in English, Spanish and Chinese.</td>
</tr>
<tr>
<td>X</td>
<td>Translate into Spanish and Chinese.</td>
</tr>
<tr>
<td>X</td>
<td>Offer translation in all safe harbor languages upon request.</td>
</tr>
<tr>
<td>X</td>
<td>Provide notice in English, Spanish, and Chinese, with free language assistance text block where possible.</td>
</tr>
<tr>
<td>X</td>
<td>Translate into all safe harbor languages on website and in printed form available on request.</td>
</tr>
</tbody>
</table>

#### Materials & Documents

**Material:**
- Student Guide in English, Spanish, and Chinese.
- Free language assistance text block.
- Notice of free language assistance.

**Website:**
- Google Translate button.
- Multilingual navigation.
- Interdepartmental translation.

**Website Notes:**
- Website links are provided in English, Spanish, and Chinese.

**Website Notes (Virtual Document):**
- Notice of free language assistance.
- Language assistance options.

**Legal Notice:**
- Compliant.

**Compliance:**
- AC Transit is committed to providing language assistance to all users.
<table>
<thead>
<tr>
<th>X</th>
<th><strong>Language Technology</strong></th>
<th><strong>Digital Tools or Resources</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>Encourage all employees to use individual initiative to teach new technology (such as language learning apps)</td>
<td>Language Technology and Digital Tools or Resources</td>
</tr>
<tr>
<td>X</td>
<td>Encourage all employees to use individual initiative to teach new technology (such as language learning apps)</td>
<td>Language Technology and Digital Tools or Resources</td>
</tr>
<tr>
<td>X</td>
<td>Use of AC Transit Over-the-Phone and Publicize Availability of the District via the telephone assistance.</td>
<td>Language Assistance and Public Notice</td>
</tr>
</tbody>
</table>

**Note:** The table above outlines various strategies and tools for enhancing language assistance and accessibility, including the use of digital tools, language technology, and manual resources such as cards and manuals. The strategies are designed to make it easier for persons with limited English proficiency to navigate AC Transit services and other government-related information. The table highlights the importance of providing clear, accessible, and culturally sensitive communications to ensure that all individuals can access and understand the information they need.
<table>
<thead>
<tr>
<th>Employee Assistance</th>
<th>Action</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Promote the availability of tuition-reimbursement funds to all employees and encourage</strong></td>
<td><strong>X</strong></td>
<td><strong>Language</strong>: Create and distribute „I speak...“ buttons to all volunteer employees who speak multiple languages.</td>
</tr>
<tr>
<td><strong>Promote the availability of tuition-reimbursement funds to all employees and encourage</strong></td>
<td><strong>X</strong></td>
<td><strong>Ambassadors</strong>: Interpretation in the event of an emergency. Explore options for compensation for employees who speak languages.</td>
</tr>
<tr>
<td><strong>Create an ambassador program using AC Tansport employee volunteers who represent various</strong></td>
<td><strong>X</strong></td>
<td><strong>Train employees to Title VI-</strong> Provide assistant support and facilitate training for all drivers to 80 through „Referesh„ diversity training.</td>
</tr>
<tr>
<td><strong>Provide assistant support and facilitate training for all drivers to 80 through „Referesh„ diversity training.</strong></td>
<td><strong>X</strong></td>
<td><strong>Training for Title VI-</strong> Include Title VI training as part of employee diversity training.</td>
</tr>
<tr>
<td><strong>Provide assistant support and facilitate training for all drivers to 80 through „Referesh„ diversity training.</strong></td>
<td><strong>X</strong></td>
<td><strong>Bilingual employees</strong>:</td>
</tr>
</tbody>
</table>
Appendix E: Record of Decision for the East Bay Bus Rapid Transit Project

AC Transit has not proposed the construction of any new transit facilities during the last three years and has not undertaken any new Facility Equity Analyses. A previous NEPA analysis was conducted for the East Bay Bus Rapid Transit (BRT) project, and the Record of Decision was issued by the Federal Transit Administration on June 8, 2012, and is incorporated in the Title VI Program by reference.
Appendix F: Board Policy 545

Appendix G: Demographic Maps

Map 1: Attractors and Generators of trips within AC Transit Service Area
Map 2: People of Color in AC Transit Service Area
Map 3: African American/Black Population in AC Transit Service Area
Map 4: Asian or Pacific Islander Population in AC Transit Service Area
Map 5: Latino/Hispanic Population in AC Transit Service Area
Map 6: Low Income Population in AC Transit Service Area
Appendix H: ACT 2012 Onboard Survey Report

AC Transit conducted a survey of riders in 2012. Staff report 13-114a was received by the Board of Directors on November 13, 2013, and is incorporated in the Title VI Program by reference, and can be found at the following location on the AC Transit website: [http://www.actransit.org/wp-content/uploads/board_memos/13-114a%20Onboard%20Survey.pdf](http://www.actransit.org/wp-content/uploads/board_memos/13-114a%20Onboard%20Survey.pdf)
Appendix I: Board Policy 110

Board Policy 110, “Public Hearing Process for the Board of Directors,” was adopted in 1994 and amended by the AC Transit Board on August 13, 2014 to comply with Title VI requirements. It is incorporated in the Title VI Program by reference, and is available on the following AC Transit website: http://www.actransit.org/about-us/board-of-directors/board-policies/
Appendix J: Staff Reports for Title VI Policies and Outreach Activities

Staff report 13-305d regarding establishment of thresholds for Disparate Impact and Disproportionate Burden, and related to amendments to Board Policies 110 (formerly 163) and 518 (formerly 551), was approved by the Board of Directors on August 13, 2014, and is incorporated in the Title VI Program by reference. It can be found in the following location on the AC Transit website: http://www.actransit.org/wp-content/uploads/board_memos/13-305d%20Title%20VI.pdf
Appendix K: Prior Service and Fare Equity Analyses

Since September 2014, staff conducted five service equity analyses. They can be found on the website under each link and are included here as reference:

- **September 2015: Title VI Evaluation of Changes to Late Night Service**

- **September 2015: Title VI Evaluation of Continuation of Service Pilot (Line 46L)**

- **January 2015: Title VI Evaluation of Spring Service Improvements**

- **March 2016: Title VI Evaluation of Service Expansion Plan**

- **March 2016: Title VI Evaluation of Changes to lines 667, 668, and 675**