

City of Gainesville  
**REGIONAL  
TRANSIT SYSTEM**

Enhancing the Quality of Life and Transportation in the Gainesville, FL Community



TITLE VI PLAN  
**2025-2028**

**TITLE VI of the CIVIL RIGHTS ACT of 1964  
PROGRAM PLAN  
CITY OF GAINESVILLE, FLORIDA  
RECIPIENT ID #1084**

**2025-2028 Plan Update Draft**

**Scheduled for  
City Commission Meeting  
August 21, 2025**

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## **I. INTRODUCTION**

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

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

The Federal Transit Administration ("FTA") has also placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency ("LEP").

Recipients of public transportation funding from FTA and the Florida Department of Transportation (FDOT) are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory, as required under Title VI.

This is the updated Title VI Program, and it covers the period from October 1, 2025 through September 30, 2028. It details how the Regional Transit System, RTS, incorporates nondiscrimination policies and practices in providing services to the public.

## **II. OVERVIEW OF SERVICES**

Being a part of the City of Gainesville, RTS' mission as a transportation provider is to enhance the quality of life in our community by providing safe, courteous, equitable, reliable and energy-efficient transportation services. Transportation services are provided in accordance with the RTS Transit Planning Process, System Safety and Security Program Plan, Transit Asset Management Plan, Public Transportation Agency Safety Plan and Transportation Disadvantaged Service Plan.

Our service incorporates fixed-route bus routes connecting the City of Gainesville, the University of Florida (UF), Santa Fe College (SF), and some unincorporated parts of Alachua County. In addition to the fixed-route services, RTS contracts with a for-profit company to provide paratransit service. RTS contracts with MV Contract Transportation, which is a for profit company, to provide ADA complementary paratransit. Accordingly, RTS fleet also includes cutaway vans used for paratransit services. All service vehicles are equipped for wheelchair service. MV Transportation has been designated as the Community Transportation Coordinator (CTC) by the State of Florida.

RTS transit services fulfill a wide range of trip purposes that include: employment, education, medical, nutrition, shopping, social services, leisure and recreation. The agency primarily uses 40' buses on the fixed-route to provide passenger services, and a variety of support vehicles. RTS is also providing curb-to-curb microtransit services to promote transit in areas without fixed bus service and commonly referred to as transit service deserts. Service relies on the use of ADA-accessible vans.

RTS' service area covers over 80 square miles (Gainesville covers 65.27 square miles) and serves an UZA with a current population of 213,748, which encompasses the Gainesville metropolitan area and portions of unincorporated Alachua County. Ridership is monitored carefully and routes are assessed for serviceability to riders, and when poor frequency creates overcrowding or, underutilization of routes is observed, RTS modifies its routes based on ridership needs. In partnership with local and regional planning agencies, routes and levels of service are also adjusted, based on emerging land development in order to address new service areas. In FY24 RTS provided service on 46 fixed routes and served over five million passenger trips. RTS' ADA complementary, non-fixed route paratransit service provides door-to-door service to anyone who is paratransit-certified on an appointment basis. Meeting the community's needs with paratransit service is critical to RTS mission in delivering transportation services to all who need transit mobility. FY24 performance measures document a total ridership of over 47,000 passenger trips on non-fixed route ADA services, utilizing a fleet of 27 paratransit vans. The agency also contracted with another provider for vanpool services, utilizing a fleet of six vehicles which completed over 78,000 monthly revenue miles. This represents the number of vehicle miles covered in those vehicles with car-pool passengers on board.

### III. POLICY STATEMENT AND AUTHORITIES

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

The City of Gainesville Regional Transit System (RTS) assures the Florida Department of Transportation that no person shall on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the agency, and assures the public that as a matter of state and local law in Section 760.01, Florida Statutes, and Chapter 8, Article I, Gainesville Code of Ordinances, in addition to the foregoing, no person shall be excluded on the basis of gender, gender identity, or sexual orientation.

RTS is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

RTS’ Title VI Manager will participate in monitoring Title VI activities, in addition to other job responsibilities, as required by Title 23 Code of Federal Regulations (“CFR”) Part 200, and Title 49 CFR Part 21.

Authorities: 49 CFR Part 21.7(a): Every application for Federal financial assistance to which this part applies shall contain, or be accompanied by, an assurance that the program will be conducted or the facility operated in compliance with all requirements imposed or pursuant to [49 CFR Part 21].

In addition to assuring the Florida Department of Transportation that RTS will not discriminate against any individual on the basis of race, color, national origin, age, disability, family or religious status, as provided by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992, or be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination or retaliation under any program or activity undertaken by the RTS, the agency further agrees to the following responsibilities with respect to its programs and activities:

- Designate a Title VI Liaison that has a responsible position within the organization and access to the recipient’s Chief Executive Officer or authorized representative.
- Issue a policy statement signed by the Executive Director or authorized representative, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the Recipient’s organization and to the general public. Such information shall be published where appropriate in language other than English.
- Insert the clauses of Section 4.5 of this plan into every contract subject to the Acts and the Regulations.
- Develop a complaint process and attempt to resolve complaints of discrimination against RTS.
- Participate in training offered on the Title VI and other nondiscrimination requirements.
- If reviewed by FDOT or any other state or federal regulatory agency, take affirmative actions to correct any deficiencies found within a reasonable time period, not to exceed ninety (90) days.

**THIS ASSURANCE** is given in consideration of and for the purpose of obtaining any and all federal funds, grants, loans, contracts, properties, discounts or other federal financial assistance under all programs and activities and is binding. The person whose signature appears below is authorized to sign this assurance on behalf of the agency.

---

Jesus Gomez, Transportation Director  
City of Gainesville

#### **IV. NONDISCRIMINATION ASSURANCES TO FDOT**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with USDOT’s Title VI regulations. This requirement is fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA. The Florida Department of Transportation (FDOT) shall collect Title VI assurances from sub-recipient prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to FDOT at the time of grant application and award, RTS will submit a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (“EEO”) and contracting (“DBE”), and nondiscrimination because of a disability (“ADA”).

In signing and submitting the assurance, the Regional Transit System confirms to FDOT our commitment to nondiscrimination and compliance with federal and state requirements and, RTS will remain in compliance with this requirement by annual submission of certifications and assurances as required by FDOT.

#### **V. PLAN APPROVAL DOCUMENT**

The Plan was approved and adopted by RTS’ governing body, the City of Gainesville City Commission, during a meeting held on August 21, 2025. A copy of the meeting minutes is hereby attached.

I am committed to ensuring that no person is excluded from participation in, or denied the benefits of RTS transportation services on the basis of race, color or national origin, as protected by Title VI according to FTA Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

\_\_\_\_\_  
Signature of Authorizing Official  
Jesus Gomez, Transportation Director  
City of Gainesville

\_\_\_\_\_  
Date

#### **VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES**

Under the authority of RTS, Krys Ochia, Transit Planning Manager, will devote necessary time, as appropriate, as the Title VI Manager and, in collaboration with the City of Gainesville staff (Office of Equity and Inclusion), be responsible for ensuring implementation of the transit agency’s Title VI program plan.

Overall Organization for Title VI

RTS Title VI designated manager and City of Gainesville staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, reviews and updates, and internal education. Specifically, the responsibilities of RTS Title VI Manager include:

- Maintain knowledge of Title VI requirements.
- Attend training on Title VI and other nondiscrimination authorities when offered by FDOT or any other regulatory agency.
- Disseminate Title VI information to the public (working with RTS’ Marketing department) including in languages other than English, when necessary.

- Collate data (relying on Census Information, as appropriate and necessary) related to race, gender and national origin of service area population to ensure low income, minorities, and other underserved groups are included and not discriminated against.
- Support procedures for the prompt processing of RTS Title VI complaints.

#### General Title VI Responsibilities of the Agency

The City of Gainesville is responsible for ensuring the aforementioned elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery, in coordination, as appropriate, with RTS Title VI Manager.

1. Data Collection: to ensure that Title VI reporting requirements are met, City and RTS will maintain:
  - A database of Title VI transit-related complaints received that tracks the investigation of and response to each complaint.
  - A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.
2. Annual review of Title VI program: Each year the Agency may review its Title VI program to ensure implementation of the Title VI plan. In addition, RTS Title VI manager may review agency operational guidelines and Publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.
3. Dissemination of information related to the Title VI program: Information on RTS' Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document and according to federal and state laws/regulations. The Title VI Program will be available in other languages, when needed, according to the LEP plan.
4. Resolution of complaints: any individual may exercise his or her right to file a complaint, if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. The reporting and resolution of complaints will follow procedures identified in City of Gainesville EEO-8: City of Gainesville Office of Equity and Inclusion EEO-8 Policies (Appendix A).
5. Written policies and procedures: RTS' Title VI policies and procedures are documented in this plan, appendices and attachments. This plan will be updated every three years to incorporate changes and additional responsibilities that arise.
6. Internal education: RTS employees will receive training on Title VI and procedures, as part of City of Gainesville's policies and hiring procedures. The training will include requirements of:
  - Title VI, and RTS obligations under Title VI. In addition, training will be provided when any Title VI-related policies or procedures change, or when appropriate, in resolving a complaint.
  - Title VI training is the responsibility of the City of Gainesville, in collaboration with RTS.
7. Title VI clauses in contracts: In all federal procurements requiring a written contract or Purchase Order (PO), RTS' contracts shall include appropriate non-discrimination clauses.

## **VII. REQUIREMENTS OF TRANSIT OPERATORS**

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

RTS is disseminating this information to the public by posting Title VI Notice:

- (a) On the agency's website,
- (b) In public areas, including the kitchen, employees-only spaces, and drivers' lobby, and
- (c) On federally funded vehicles in passenger fleet.

RTS also includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

RTS is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on RTS' non-discrimination policies and procedures, or to file a complaint, please visit RTS' website at: [http://go-rtis.com/about\\_rts/title-vi](http://go-rtis.com/about_rts/title-vi).

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also included within RTS ride guide and other brochures.

- (d) The following is the public notice used by RTS

## Title VI Notice to the Public



Regional Transit System  
PO Box 490, Station 5  
Gainesville, FL 32627-0490  
(352) 334-2609  
(352) 334-3681 (fax)  
www.go-rt.com

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### *GAINESVILLE RTS: Title VI Notice to Public*

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#### 1. Gainesville Regional Transit System (RTS) Title VI Notice to the Public

RTS operates its transit services without regard to race, color, national origin, age, disability, gender, family or religious status, as provided by Title VI of the Civil Rights Act of 1964 as amended in 1991, the Civil Rights Restoration Act of 1987 and the Florida Civil Rights Act of 1992 and Gainesville Code of Ordinance, Chapter 8, Article 1.

#### 2. RTS Title VI Statement

Title VI of the Civil Rights Act states that no person in the United States shall, on the grounds of race, gender, color, religious or ethnic considerations be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance. RTS is committed to complying with the requirements of Title VI in all its federally-funded programs and activities.

#### 3. Making Title VI Complaint

Any person who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Acts of 1964, its amendments and related statutes, by the Gainesville Regional Transit System (RTS) in its role of planning and programming of federal funds, may submit a written complaint. Any such complaint must be in writing and filed with the Office of Equity and Inclusion (formerly known as the Equal Employment Opportunity, EEO) within 180 days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from the Office of Equity and inclusion by any of the following methods:

##### 3.1. Internet

Download the Title VI Complaint Form or Title VI Complaint Procedure:

<https://www.go.rts.com/feedback.php#titlevi>

##### 3.2. Walk-in and Mailing Address

Forms can also be picked up at the  
Old Library Building,  
222 E University Ave, 2<sup>nd</sup> Fl,  
Gainesville, FL 32602.

Mail completed forms to  
City of Gainesville, Office of Equity and Inclusion  
P.O. Box 490, Mail Station 52  
Gainesville, FL 32602

OUR VISION: *The City of Gainesville will set the standard of excellence for a top ten mid-sized American city; recognized nationally as an innovative provider of high-quality, cost-effective services.*

## ***Title VI Complaint Procedures and Complaint Form***

Contact the City's Office of Equity and Inclusion to request a Complaint Form.

Telephone: (352) 334-5051  
Hearing Impaired: (800) 955 8771  
Email: [equalopportunity@cityofgainesville.org](mailto:equalopportunity@cityofgainesville.org)  
Fax Number: (352) 334 2088

**FTA Civil Rights Complaint:** Persons who wish to file a complaint with the FTA are free to mail their FTA Complaint Form obtained from [http://www.fta.dot.gov/civilrights/12328\\_5104.html](http://www.fta.dot.gov/civilrights/12328_5104.html) to the Region 4 Office at the following address.

Federal Transit Administration  
Office of Civil Rights  
Attention: Complaint Team  
230 Peachtree Street, NW, Suite 1400  
Atlanta, GA 30303

Sample Public Notice in other languages can be found in Appendix B. As part of Title VI requirements, RTS' sub-recipients are also required to maintain a list of locations where their Title VI Notices have been posted or displayed. However, RTS does not have sub-recipients, see Appendix C.

To comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

### ***Complaint Procedure***

RTS 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 provided by Title VI of the Civil Rights Act of 1964, as amended. Any person who believes that he or she or any specific class of persons has been subjected to discrimination that is prohibited by Title VI of the Civil Rights Act of 1964, its amendments and related statutes, by the Gainesville Regional Transit System (RTS) in its role of planning and programming of federal funds may submit a written complaint. To comply with 49 CFR part 21.9(b), RTS maintains the following procedure to receive, review, resolve and track complaints related to Title VI.

### ***How to Submit a Title VI Complaint***

Complaints may be submitted for discrimination on the basis of race, color, national origin or language. Any such complaint shall be submitted in writing no later than 180 days after the date the person believes the discrimination occurred. Written complaints shall be submitted to the City of Gainesville, Office of Equity and Inclusion (formerly known as the Equal Employment Opportunity Office). The Office of Equity and Inclusion shall maintain and follow the complaint procedures outlined in City of Gainesville EEO-8 Policies.

All telephone calls, walk-ups, or emails related to discrimination, including those identified in Title VI, shall be directed to the City of Gainesville Office of Equity and Inclusion. The person wishing to file a complaint must complete and sign a Complaint Form and return it by mail to the address on the form or drop the form off at the Office of Equity and Inclusion at City Hall. The Complaint Form can be picked up at the Old Library Building address below or downloaded from the RTS website at: [http://go-rts.com/about\\_rts/title-vi](http://go-rts.com/about_rts/title-vi)

**Walk-in Address:** Old Library Building, 222 E. University Ave., 2nd Floor, Gainesville, FL 32602

**Phone Numbers:** (352) 334-5051 (Voice) (352) 334-2069 (TDD)

**Mailing Address:** City of Gainesville, Office of Equal Opportunity, PO Box 490, Mail Station 52, Gainesville, FL 32602

### ***Review of Complaints***

Upon receipt of non-Title VI complaint from a transit customer, RTS will review the complaint and provide a written response within ten (10) business days. For complaints of Title VI discrimination, the individual must submit a “Complaint of Discrimination” form to the Office of Equity and Inclusion within one hundred-eighty (180) days of the alleged act of discrimination.

For complaints related to discrimination, the review will include the gathering of additional information from the complainant and/or the alleged discriminating party(ies). If the complaint is found to have merit, the report of the Office of Equity and Inclusion shall also include proposed resolutions and/or recommended actions, such as:

- Identifying remedial actions that are available to offer redress.
- Identifying possible improvements to the RTS Title VI process.

### ***Resolution of Complaints***

For non-discrimination complaints, RTS shall issue a written or email response or complete a telephone call with the complainant within ten (10) working days of receiving the complaint. For complaints related to Title VI discrimination, the City of Gainesville Office of Equity and Inclusion Director shall follow the process outlined in EEO-8 for addressing such complaints.

### ***Concurrent Complaints and Appeal***

The procedures described above do not in any way abridge the right of the complainant to file concurrent complaints with other state or federal agencies and/or seek private counsel. The procedures above are part of an administrative resolution process that does not include punitive damages or compensatory payment. The complainant has the right to appeal the City of Gainesville’s response by submitting the complaint to the Federal Transit Administration, as described in FTA Circular 4702.1B (<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>). Notice of this right shall be included in the City of Gainesville’s response to the complainant.

### ***Complaint Tracking***

The City of Gainesville maintains a database of discrimination complaints that are related to Title VI. This information (excluding details about the complainant) will be available for public review at the City of Gainesville Office of Equity and Inclusion, at 222 E. University Avenue, 2nd Floor, Gainesville, FL 32602, during business hours. The log will include the date of investigation, a summary of allegations, status of investigation, and the action taken by RTS, a recipient of federal funds.

### ***Complaint Form***

Copies of the complaint form in English, Spanish and Chinese are provided in Appendix D and on RTS’s website ([http://go-rt.com/about\\_RTS/title\\_VI](http://go-rt.com/about_RTS/title_VI))

### ***Record Retention and Reporting Policy***

FTA requires that all direct and primary recipients document their compliance by submitting an updated Title VI Plan to their FTA regional civil rights officer once every three (3) years. Compliance records and all Title VI related documents will be retained for a minimum of three (3) years.

### ***Sub-recipient Assistance and Monitoring***

RTS does not have any sub-recipients to provide monitoring and assistance. As a sub-recipient to FDOT, RTS utilizes the sub-recipient assistance and monitoring provided by FDOT, as needed. In the future, if RTS has sub-recipients, it will provide assistance and monitoring as required by FTA Circular 4702.1B.

### ***Contractors and Subcontractors***

RTS is responsible for ensuring that contractors are in compliance with Title VI requirements. Contractors may not discriminate in the selection and retention of any subcontractors. Subcontractors also may not discriminate in the selection and retention of any subcontractors. RTS, contractors, and subcontractors may not discriminate in their employment practices in connection with federally assisted projects. Contractors and subcontractors are not required to prepare or submit a Title VI Plan. However, the following nondiscrimination clauses will be inserted into every

contract with contractors and subcontractors subject to Title VI regulations.

**Non-Discrimination Clause:** During the performance of a contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the “Contractor”) must agree to the following clauses:

1. **Compliance with Regulations:** The Contractor shall comply with the Regulations relative to nondiscrimination in Federally-assisted programs of the U.S. Department of Transportation (hereinafter, “USDOT”) Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this Agreement.

**Nondiscrimination:** The Contractor, with regard to the work performed during the contract, shall not discriminate on the basis of race, color, national origin, sex, age, disability, religion or family status in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in the discrimination prohibited by section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix C of the Regulations.

**Solicitations for Subcontractors, including Procurements of Materials and Equipment:** In all solicitations made by the Contractor, either by competitive bidding or negotiation for work to be performed under a subcontract, including procurements of materials or leases of equipment; each potential subcontractor or supplier shall be notified by the Contractor of the subcontractor’s obligations under this contract and the Regulations relative to nondiscrimination on the basis of race, color, national origin, sex, age, disability, religion or family status.

**Information and Reports:** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a Contractor is in the exclusive possession of another who fails or refuses to furnish this information the Contractor shall so certify to the Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

**Sanctions for Noncompliance:** In the event of the Contractor’s noncompliance with the nondiscrimination provisions of this contract, RTS shall impose contract sanctions as appropriate, including, but not limited to:

- a. withholding of payments to the Contractor under the contract until the Contractor complies, and/or
- b. cancellation, termination or suspension of the contract, in whole or in part.

**Incorporation of Provisions:** The Contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontract or procurement as the RTS, Florida Department of Transportation, the Federal Highway Administration, Federal Transit Administration, Federal Aviation Administration, and/or the Federal Motor Carrier Safety Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

Since 2009, RTS has contracted with MV Transportation, Inc. as the sole provider of paratransit services in the RTS service area. As part of their contractual obligation and in accordance with Title VI of the Civil Rights Act, MV Transportation does not discriminate on the grounds of race, color, or national origin and it agrees to comply with applicable Federal implementing regulations and other implementing regulations that FTA may issue. MV Transportation notifies employee of their obligation under Title VI in their employee handbook, as well as informational notices in their employee break room. Any Title VI complaints received by MV Transportation, Inc. are required to be reported to RTS as they occur.

Instructions for filing Title VI complaints are posted on the agency’s website and in posters on the interior of each vehicle operated in passenger service and agency’s facilities, and are also included within RTS’ ride guides, website and brochures.

A copy of the City’s Complaint Form (in English) is attached as Appendix E.

**Transportation-Related Title VI Investigations, Complaints, and Lawsuits**

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to the FTA every three (3) years.

1. A summary of these complaints and status is attached as Appendix F.
2. The following is a description of all pending applications for financial assistance and all financial assistance currently provided by other Federal agencies to RTS.

Current & Pending FTA Funding

Current Active FTA Grants: \$92,960,395.00

Grant Contract Number	Description	Agency	Date Executed
FL-2018-094	5307 & 5339 Formula Grant Capital & Op Asst.	FTA	9/4/2018
FL-2019-091	5307 & 5339 Formula Grant Capital & Op Asst.	FTA	9/25/2019
FL-2020-005	5339 Small Urbanized Area Capital Assistance	FTA	1/9/2020
FL-2020-108	5307 & 5339 Formula Grant Capital & Op Asst.	FTA	9/11/2020
FL-2020-110	5339 Small Urbanized Area Capital Assistance	FTA	9/21/2020
FL-2021-012	5339C Competitive Grant Capital Assistance	FTA	3/5/2021
FL-2021-069	5307 & 5339 Formula Grant Capital & Op Asst.	FTA	9/8/2021
FL-2022-065	5307 CRRSAA Supplemental Grant Capital Assistance	FTA	9/19/2022
FL-2023-048	5339B Bus and Bus Facilities Grant Capital Assistance	FTA	9/20/2023
FL-2023-021	5307 & 5339 Formula Grant Capital & Op Asst.	FTA	9/20/2023
FL-2023-055	5307 & 5339 Formula Grant Capital & Op Asst.	FTA	9/20/2023
FL-2024-065	5307 & 5339 Formula Grant Capital & Op Asst.	FTA	9/10/2024
FL-2025-010	5339C Competitive Grant Capital Assistance	FTA	1/18/2025

Current Pending FTA Grants: \$10,151,066.00

Application Number	Description	Agency	Date Submitted
1084-2025-1	5307 & 5339 Formula Grant Capital & Op Asst.	FTA	6/12/2025
FL-2025-051	5307 Lapsing Funds Grant Capital Assistance	FTA	5/29/2025

Current Active FDOT Grants:

1. Service Development grants: \$1,080,000.00
  2. Section 5310 and 5311 grants: \$1,513,538.00
  3. Block Grant: \$4,131,528.00
-

Grant Contract Number	Description	Agency	Date Executed
G2J34	Bus Stop Amenities Capital Assistance	FDOT Service Development	5/10/2023
G2J35	ADA Bus Stop Improvements Capital Assistance	FDOT Service Development	5/10/2023
G2S68	5311 Capital Vehicle Award	FTA via FDOT	1/3/2024
G2X50	5310 Operating Award (Senior Free Fares)	FTA via FDOT	5/1/2024
G2X76	5310 Capital Vehicle Award	FTA via FDOT	5/16/2024
G2X77	5310 Capital Vehicle Award	FTA via FDOT	5/16/2024
G3528	Block Grant Operating Assistance	FTA via FDOT	11/1/2024
G3726	5311 Operating Award	FTA via FDOT	12/5/2025
G3C66	5310 Capital Vehicle Award	FTA via FDOT	5/19/2025

**Current Pending FDOT Grants:**

1. Service Development Grants: \$1,017,270.00
2. Corridor Development Grants: \$4,424,485.00
3. Section 5310 and 5311 grants: \$381,747.00

Application Number	Description	Agency	Date Submitted
N/A	Compass Route FDOT Corridor Development Grant	FDOT Corridor Development	10/4/2023
N/A	FFY2024 Sec 5310 Operating Award	FTA via FDOT	1/16/2024
N/A	FFY2026 Sec 5310 Capital Vehicle award	FTA via FDOT	1/30/2025
N/A	FFY2026 Sec 5311 Operating Award	FTA via FDOT	1/31/2025
N/A	MOD North State FY26-27 Service Development Grant	FDOT Service Development	5/30/2025

**Other Current Active Grants: Florida Department of Environmental Protection: \$1,200,000.00**

VW303	Electric Bus Transit Grant Program	FDEP	5/5/2023
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Summary of all civil rights compliance reviews conducted by the federal government in the last three (3) years. A Compliance Letter is shown in Appendix G.

	YEAR	AGENCY CONDUCTING REVIEW	RESULT	ACTION(S) TAKEN
REVIEW TYPE				
Triennial	2024	FTA	In Compliance	Completed

***Public Outreach and Involvement Activities***

***Introduction***

The Public Participation Plan (“PPP”) is a guide for ongoing public participation endeavors. Its purpose is to ensure that RTS utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (“LEP”) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that LEP persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

RTS established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

RTS will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in the agency's decision-making process.

Examples of effective public outreach practices followed by RTS include:

1. Determining and identifying what meetings and program activities lend themselves to benefit public participation;
2. Scheduling meetings at times and locations that are convenient and accessible to minority and LEP communities.
3. Employing different meeting sizes and formats.
4. Coordinating with community and faith-based organizations, educational institutions, and other organizations to conduct meetings.
5. Radio, television, newspaper ads, and inserts, social media specifically directed to benefit or serve LEP and minority populations.
6. Attending community meetings, fairs and other events holding in the community.

A copy of RTS' Summary of Outreach Efforts for this plan update is attached as Appendix H.

## ***RTS Public Participation Plan***

### ***Introduction***

Development of premier transit services depends on public outreach that engages local citizens, businesses, regional and corridor-wide governmental bodies, and interested groups. As such, the City of Gainesville's Regional Transit System (RTS) places priority on active, inclusive public involvement, and makes a concerted effort to include minority and Limited English Proficient (LEP) populations and other constituencies that are traditionally underserved during its planning and project development processes. More specifically, RTS recognizes its obligations under Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898, and the Florida Civil Rights Act of 1992, and is therefore committed to ensuring that no person shall, on the basis of race, color, national origin, marital status, handicap, sex, age, disability, family, income, or religious status, be excluded from participation in, be denied the benefits or services of, or be otherwise subjected to discrimination or retaliation under any RTS program or activity.<sup>1</sup> The processes described here will also be used for developing RTS service and fare changes in order to address potential disparate and adverse impacts or disproportionate burden, and for setting policies.

To the greatest extent possible, RTS creates unique public involvement plans, tailored to meet the individual needs of

<sup>1</sup> Persons who require special accommodations under the Americans with Disabilities Act (ADA) or persons who require translation services to participate in public meeting activities are requested to notify RTS at least seven days prior to workshops or meetings. RTS public meeting notices include RTS contact information and a deadline date for requesting special accommodations.

each project or activity rather than a single, monolithic document that attempts to cover all situations.<sup>2</sup> For that reason, the following public involvement plan summarizes strategies and efforts that RTS pulls from when developing these more definite plans. These public involvement plans are also shaped in accordance with RTS' Transit Development Plan (TDP), which is mandated by Florida Administrative Code (F.A.C) Rule 14-73.001 and submitted to the Florida Department of Transportation (FDOT), and annually updated as an Annual Progress Report, APR. The RTS TDP outlines existing and future conditions, priorities and financial planning strategies, and public outreach approaches and policies for riders and citizens within the service area, with particular attention to LEP customers/citizens. RTS' TDP was developed to be consistent with the Metropolitan Transportation Planning Organization (MTPO) for the Gainesville Urbanized Area's Public Participation Plan.

### ***Public Participation Plan Techniques***

The public involvement plan contains a variety of techniques to maximize the active participation by citizens or their representatives and to build trustworthiness between RTS and these individuals.<sup>3</sup> These techniques are transparent and flexible and can be classified as direct involvement activities or information distribution activities. The former refers to engaging the public in "hands on" workshops and/or discussions about a project while the latter refers to the dissemination of public information materials.

### ***Direct Participation Activities***

Direct participation activities used by RTS to obtain public feedback include the following:

Project review committees provide oversight and technical feedback during project development processes. Representatives may be selected from groups such as:

- RTS operators and administrators
- City of Gainesville and Alachua County staff and elected officials
- FDOT and MTPO

Stakeholder interviews solicit ideas, concerns, and comments from organizations, community leaders, and other individuals identified by RTS. RTS typically conducts interviews in person or by phone and follows brief questionnaires to assist with the interview process. In addition to the representatives outlined above, stakeholder interviews may involve:

- Regional Workforce Board (Florida Works)
- University of Florida (UF) and Santa Fe College (SFC)
- UF Health Shands Hospital and Malcom Randall Veterans Administration Medical Center
- Alachua County Housing Authority
- Gainesville Chamber of Commerce
- Gainesville Community Redevelopment Agency
- Transportation Disadvantaged Board
- Builders Association of North Central Florida
- Alachua County School Board
- Elected officials from surrounding Communities
- Miscellaneous Community-based organizations, including those representing different ethnic and race-based groups.

System-wide, statistically valid, on-board surveys of RTS fixed-route bus patrons provide information about passenger demographics, travel behavior, satisfaction, needs, and issues. On-board surveys typically coincide with major updates

<sup>2</sup> Considerations that go into deciding the type of plan developed include fiscal impact of the action and size of the action (stop-based versus service area/route-based based changes).

<sup>3</sup> This acknowledges that individuals' purposes like elected officials represent the opinions of their constituency. This does not imply that RTS bypasses direct interaction with citizens. For example, while RTS frequently uses informational booths on the University of Florida campus to collect information from students, it recognizes the value of speaking with UF officials who receive frequent feedback regarding RTS services. RTS has also worked with the student governing bodies of UF and Santa Fe College to obtain input on services.

to the TDP and, the occasional Comprehensive Operational Analyses. A major update to the 10-Year TDP occurs every five years.

RTS also effectively uses non-statistically valid surveys to gather the opinions, ideas, or needs of operators and the community. Some examples include the use of surveys to identify the languages operators speak, and preferred alignments and amenities for possible premium transit services. Social media sites, like Facebook and Twitter, have introduced a whole new range of opportunities for impromptu, informal surveys to gather immediate feedback.<sup>4</sup>

Public workshops and Open Houses are recognized as effective techniques for obtaining substantive public participation during planning and policy development processes and are the primary mechanism for soliciting public input regarding transit needs and impacts within RTS service area. Public workshop locations are distributed across the RTS service area to ensure substantial spatial coverage and are identified based upon their presence near high frequency transit routes, ability to accommodate the physically disabled, and well-known status in the area.<sup>5</sup> At workshops and public meetings, attendance sheets are provided so individuals who want to stay involved are able to provide their contact information for future outreach and provide comments in case they are uncomfortable speaking in front of a group.

Public workshops employ one or more public participation techniques, with the type of strategy employed depending upon the workshop topic and venue:

- Presentations
- Surveys
- Dot polling (expressing preferences with dots or stickers)
- Visual displays
- Question and answer sessions
- Discussion groups

RTS seeks to vary the time of day when it hosts these meetings so as to accommodate the different work schedules of individuals within the community. To accommodate the student community, RTS works with the institutions to select a favorable date and time for meetings.

RTS also regularly engages with the community at monthly or bimonthly meetings held by:<sup>6</sup>

- Alachua County Board of County Commissioners
- City of Gainesville City Commission
- RTS Citizens Advisory Board (CAB)
- MTPO Board, Technical Advisory and Citizens Advisory Committees.

### ***Information Distribution Activities***

RTS shares information with the public in a variety of ways in order to increase the number of unique groups it reaches and tailors the information to the specific event. For example, with semester schedule changes, a matrix is created showing each route and the proposed action. RTS uses the following methods to distribute information to the public regarding projects, activities, events, and meetings:

- RTS website
- Information booths

<sup>4</sup> In addition to Facebook, the RTS website, project websites such as those for TDP allow for customer feedback. Feedback forms are available on each bus as well and can be filled out directly by a passenger or with the assistance of a driver, if necessary.

<sup>5</sup> RTS' public City Commission Meetings are held at City Hall (200 East University Avenue, Gainesville, FL 32601) and Citizens Advisory Board (CAB) Meetings at RTS Administration (34 SE 13th Road, Gainesville, FL 32601). Project public meetings are held in the community, as appropriate. All facilities are within or adjacent to Census Block Groups that are identified by the most recent American Community Survey or United States Census as having above average levels of individuals and households without a vehicle, designated as below poverty, designated as a LEP individual or minority, and a non-high school graduates. It is important to note, however, that data shows that these groups are distributed throughout the RTS service area rather than being geographically isolated.

<sup>6</sup> RTS Marketing maintains a checklist of required items and actions for all events/meetings.

- RTS Facebook and YouTube accounts
- Phone-based language interpretation<sup>7</sup>
- City and County websites
- Newspapers, including the Gainesville Sun and Gainesville Guardian<sup>8</sup>
- RTS and City facilities, including City Hall, all RTS buses, and transfer locations
- Email distribution lists<sup>9</sup>
- Gainesville Public Television Channel-12

### Measures of Effectiveness

To ensure accountability and improvement, RTS sets specific, numeric initiatives regarding public outreach and customer satisfaction within its TDP and annually reports on its success in meeting these initiatives.

Examples include:

- Participating in a certain number of local job fairs, community organization meetings and events,
- Distributing service information to businesses and community facilities,
- Reducing the number of customer complaints per 100,000 riders. (This is required to be discussed and included in the annual update of Florida Department of Transportation-required TDP).

### Access for Limited English Proficient (LEP) Persons

#### RTS Language Assistance Plan

RTS plans to provide language assistance to persons with limited English proficiency in a competent and effective manner in order to ensure that their services are safe, reliable, convenient, and accessible. Utilizing examples from other transit agencies and considering the unique characteristics of the City of Gainesville and the RTS service area, RTS has developed the following language assistance plan to reach out to its specific LEP populations.

#### LEP Population Served

The four-factor analysis evaluated which LEP populations reside within the RTS service area, the frequency with which RTS has encountered these individuals, what types of services they request, and characteristics of RTS outreach to LEP population. Taking the results of this four-factor analysis into consideration, RTS is choosing to utilize the Department of Justice’s Safe Harbor Provision which focuses on targeting 5% or 1,000 persons, whichever is less, of the population of persons eligible to be served, or likely to be affected or encountered, by RTS, in order to determine if written translation or oral interpretation is necessary. As of this time, those populations in the RTS service area who meet the 5% or 1,000 threshold consist of Spanish- and Chinese-speaking LEP persons.

#### Language Assistance Services

Existing LAP program elements at RTS is shown below. These are the services that will be evaluated and updated, as necessary. They are divided into three types of services: written, oral, and community outreach.

#### RTS LAP Program Elements

##### I. Written Language Assistance

<sup>7</sup> RTS contracts with Language Line to provide phone translation services in over 200 languages, using the portal <https://translation.languageline.com/>

<sup>8</sup> All RTS public workshops and public meetings are advertised at least one week in advance.

<sup>9</sup> Email distribution lists are compiled from sign-in sheets and used to distribute project reports, surveys, future meeting dates and times.

#### Fare Schedule in Spanish and English

Bus Fare Tarifa de Autobús	Cash Fare Tarifa Efectivo (One-Way Only) (Una Solo Via)	All-Day Pass Pase Para Todo el Día
Adults Adultos	\$1.50	\$3.00
Senior Citizens 65+ Adultos de 65 o más años	\$0.75	\$3.00
Students Grade K-12 Estudiantes de grado K-12	\$0.75	\$3.00
<small>No ID Required No se requiere identificación</small>		
Santa Fe College & City College Students Estudiantes de SFC y City College	\$0.75	\$3.00
<small>Valid Student Photo ID Required Se requiere identificación de estudiantes con foto</small>		
Medicaid & Medicare Recipients Acreditado de Medicaid y Medicare	\$0.75	\$3.00
<small>Valid Photo ID Required Se requiere identificación con foto</small>		
Veterans & Active Duty Military En servicio activo y veteranos militares	\$0.75	\$3.00
<small>Valid Veteran/Military Photo ID Required Valida identificación de veteranos a Militar con foto</small>		
University of Florida Students, Faculty & Staff Estudiantes, facultad y personal de Universidad de Florida		Valid Student I.D. Valida identificación de estudiante
Shands, City of Gainesville & GRU Employees Empleados de Shands, City of Gainesville y GRU		Valid Employee Photo ID Valida identificación de empleado con foto
Veterans Affairs & Alachua County Employees Empleados de Veterans Affairs y Alachua County		Valid Employee Photo ID Valida identificación de empleado con foto
ADA Certified Persons Persona con certificado ADA		Valid ADA Photo ID Valida identificación de ADA con foto

**No Fare, No Pass, No Ride!**  
**Si No Paga o No Tiene Pase, No Viaja!**

It is a crime to refuse to pay a fare or attempt to evade payment of fare.  
Violators may be prosecuted under 812.015 Florida Statutes.  
Es un crimen negarse a pagar el pasaje o intentar evadir el pago del pasaje.  
Los violadores pueden ser procesados judicialmente según  
el estatuto 812.015 del estado Florida.

- a. Translated “How to Ride” Brochures
- b. Translated fare payment instruction
- c. Translated system maps and timetables
- d. Translated safety and security announcements
- e. Translated Title VI forms
- f. Pictographs in stations and bus fleet

## II. Oral Language Assistance

- a. Contracting for interpreters on “as needed” basis
- b. Using RTS bi-lingual personnel to interpret information
- c. Using telephone interpreter language services
- d. Translated recorded information in buses and transfer stations

## III. Community Outreach

- a. Translated TV and newspaper notices
- b. Translated radio announcements
- c. Placing notices in community media
- d. Ensuring that interpreters are available (when requested) at public meetings

### ***Introduction and Legal Basis***

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program must meet the objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, *Improving Access to Services for Persons with Limited English Proficiency (LEP)*. This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan developed by RTS is based on FTA guidelines.

As required, RTS has developed a written LEP Plan (below). Using 2023 census data and American Community Survey (ACS) 5-Year Estimates projected to 2025, RTS has evaluated the data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit; therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

### ***Assessment of Needs and Resources***

The need and resources for LEP language assistance were determined through a four-factor analysis, as recommended by FTA guidance in 2023.

#### FACTOR 1

Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

U.S. Census Data and American Community Survey

Data from the US Census Bureau’s American Community Survey (ACS) through [www.census.gov](http://www.census.gov) for RTS shows that the service area includes a total of 9,494 (or 3.48%) persons with Limited English Proficiency (those persons who indicated that they spoke English less than “very well”) in the ACS Census.

Information from the ACS also provides more details on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

Demographic Data, US Census Bureau 2023 ACS 1-Year Estimates

Language	County	Pop. Percentage
<b>Total:</b>	<b>272,942</b>	<b>-</b>
5 to 17 years:	37,677	13.8
Speak only English	32,723	14.5
Speak Spanish	2,329	10.6
Speak all other languages	2,625	0.96
18 to 64 years:	190,952	69.9
Speak only English	152,507	67.7
Speak Spanish	17,622	79.9
Speak all other languages	20,823	7.6
65 years and over:	44,313	16.2
Speak only English	40,005	17.8
Speak Spanish	2,095	9.5
Speak all other languages	2,213	0.81

**Source:** U.S. Census Bureau, U.S. Department of Commerce. "Age by Language Spoken at Home for the Population 5 Years and Over." American Community Survey, 2023 ACS 1-Year Estimates Detailed Tables

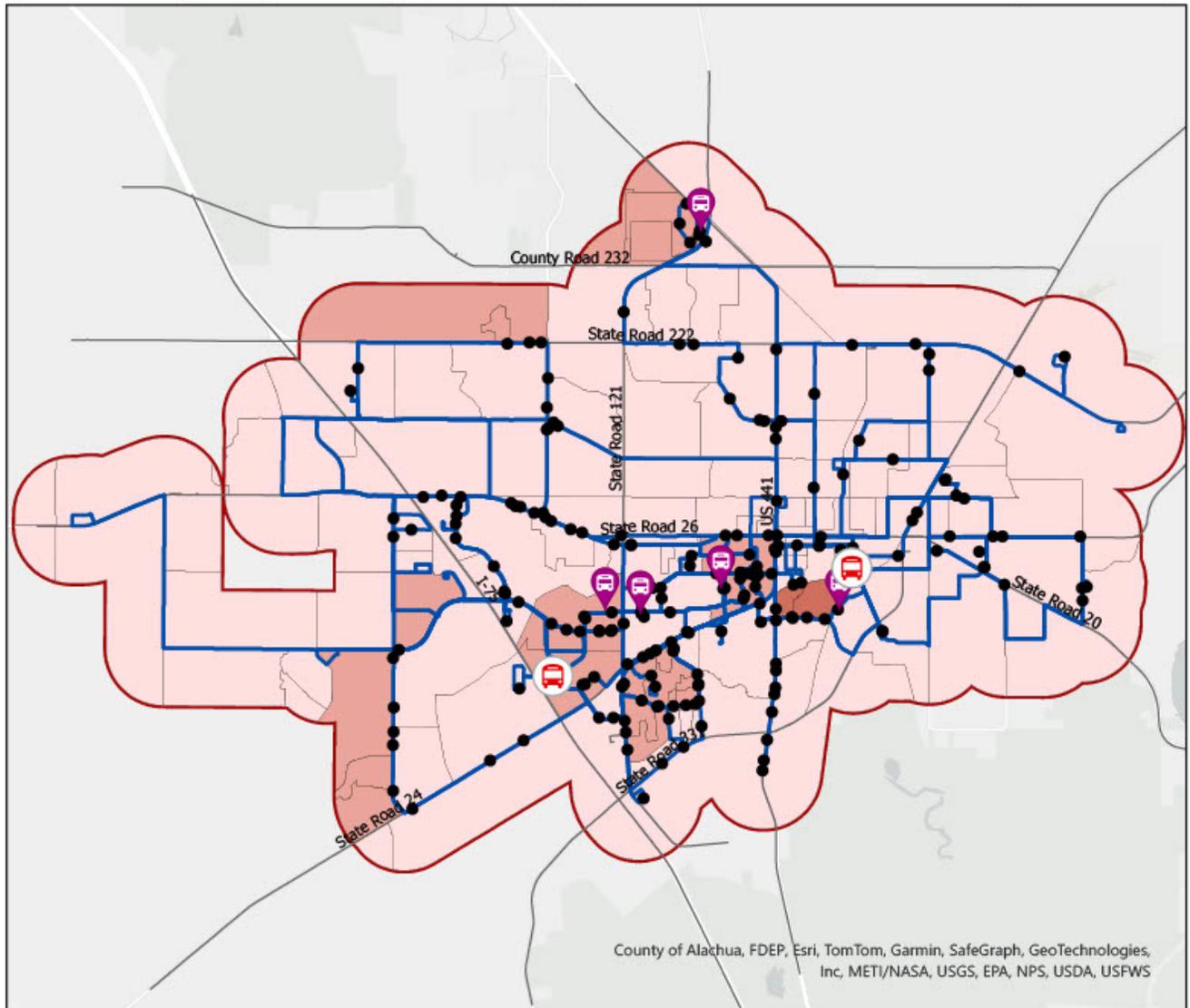
<b>Total:</b>	<b>272,942</b>
Speak only English	225,235
Spanish:	22,046
Speak English "very well"	17,609
Speak English less than "very well"	4,437
French, Haitian, or Cajun:	1,546
Speak English "very well"	1,067
Speak English less than "very well"	479
German or other West Germanic languages:	1,613
Speak English "very well"	1,613
Speak English less than "very well"	0
Russian, Polish, or other Slavic languages:	468
Speak English "very well"	404
Speak English less than "very well"	64
Other Indo-European languages:	8,137
Speak English "very well"	6,904
Speak English less than "very well"	1,233
Korean:	515
Speak English "very well"	112

Speak English less than "very well"	403
Chinese (incl. Mandarin, Cantonese):	3,913
Speak English "very well"	2,228
Speak English less than "very well"	1,685
Vietnamese:	443
Speak English "very well"	184
Speak English less than "very well"	259
Tagalog (incl. Filipino):	3,178
Speak English "very well"	2,812
Speak English less than "very well"	366
Other Asian and Pacific Island languages:	2,798
Speak English "very well"	2,399
Speak English less than "very well"	399
Arabic:	660
Speak English "very well"	660
Speak English less than "very well"	0
Other and unspecified languages:	2,390
Speak English "very well"	2,221
Speak English less than "very well"	169

**Source:** U.S. Census Bureau, U.S. Department of Commerce. "Language Spoken at Home for the Population 5 Years and Over." American Community Survey, 2023 ACS 1-Year Estimates Detailed Tables

For a better understanding of languages spoken, a spatial distribution is provided.

# All Languages: Speak English Less Than "Very Well"



County of Alachua, FDEP, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Source: Census 2023 and 5-Year American Community Survey grown to represent 2025 conditions  
 Employment Data Source: 2022 Employment data grown to represent 2025 conditions

**City of Gainesville**

- Transit Stations
- Transit Facilities
  - Shelters

### Limited English Proficiency

#### All Languages

	0 - 5%
	5 - 10%
	10 - 25%
	25 - 50%
	50 - 100%

- RTS Bus Routes
- Major Roads
- RTS Service Area

0 1.25 2.5 5 Miles

## FACTOR 2

### Assessment of Frequency LEP Individuals Come into Contact with the Transit Services or System

RTS reviewed the relevant benefits, services, and information provided by the agency and determined that LEP persons have encountered these functions through one or more of the following channels.

- Contact with transit vehicle operators
- Contact with transit station managers
- Calls to RTS customer service telephone line
- Visits to the agency's headquarters
- Access to the agency's website
- Attendance at community meetings or public hearings hosted by RTS and
- Contact with the agency's ADA complementary para-transit system (including applying for eligibility, making reservations, and communicating with drivers)

and developed the following analyses to reflect how the agency is involved in serving customers with Limited English Proficiency.

#### ***RTS Experiences with LEP Individuals***

To estimate interactions with LEP populations, RTS interviewed customer service representatives (CSR) individually, and developed and administered a survey to CSR and fixed-route transit operators.

#### ***RTS Customer Service Representative and Transit Operator Interactions***

Interviews with CSRs revealed that they only interact with LEP persons on an infrequent basis.<sup>10</sup> Most CSRs felt that even when customers did not speak English well they were still able to communicate at a level that allowed them to figure out how to use the system – and this has continued to be an on-going trend.



**PASES Y TARIFAS:**  
Averigüe lo asequible que puede montar estrategia en tiempo real.

RTS recognizes the limitations of memory recall in forming an accurate count of LEP persons encountered and the language they speak, but for current purposes, this suffices to give the agency some working knowledge of its customers.

#### Demand Response – MV Transportation Interactions

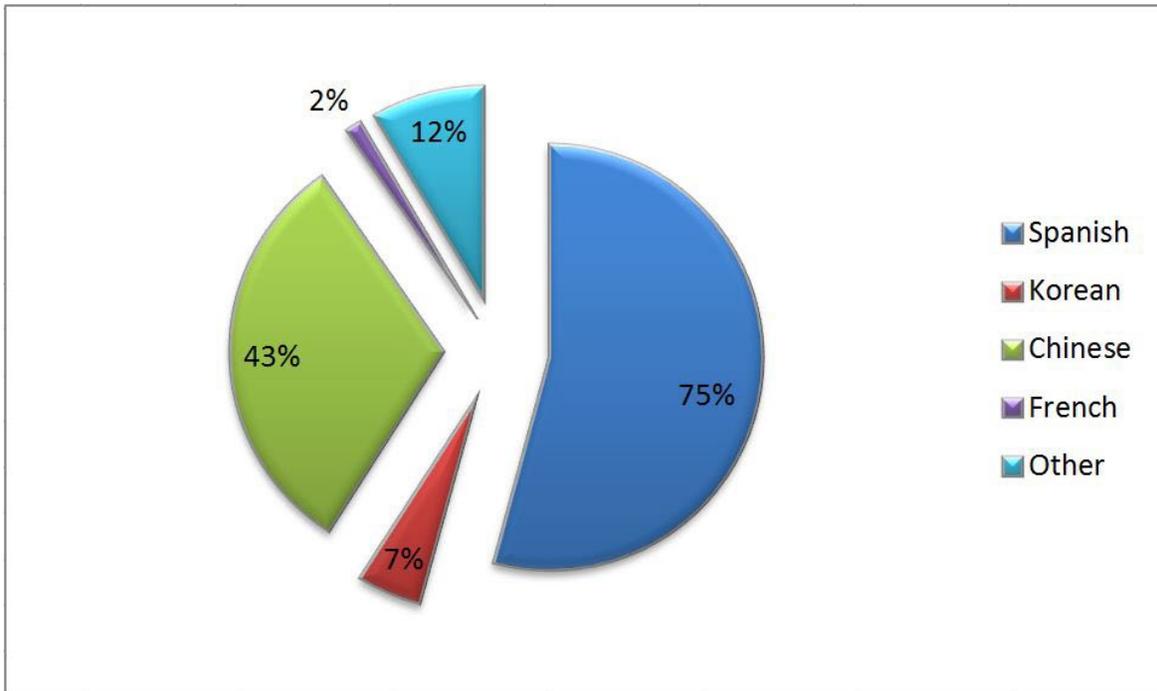
Consultation with the General Manager of MV Transportation, Inc., which provides the City's complementary ADA service, revealed that MV operators encounter LEP individuals only on a monthly or yearly basis. During these relatively rare encounters, Spanish is LEP individuals' major native language; indeed, MV has never encountered a LEP customer who spoke a language other than Spanish. Translation needs often revolve around trip planning assistance.

#### Community-based Organizations

RTS reaches out to Community-based organizations (CBOs) that were perceived as having knowledge on or interaction with Chinese and Spanish LEP populations. RTS felt that these groups could more

Figure 1: Transit Operator Survey – Which Languages Drivers Encounter the Most

<sup>10</sup> 10 CSRs are located at the Rosa Parks Downtown station and Butler Plaza Transfer Station. These are the primary transfer points for most non-UF based routes.



specifically reveal LEP person interactions with RTS, their transit needs, and their transit desires to assist the agency’s plan development, and service needs.

**Chinese CBOs**

The three City of Gainesville Asian markets, four Asian restaurants, and the Gainesville Chinese Christian Church (GCCC) constitute relevant sources for direct input regarding the transit needs of Chinese LEP persons. Many believe that the translated “How to Ride Schedules” instructions were most helpful; and they often suggest to have translated system maps and timetables which now can be accomplished with Google translate.

**Hispanic CBOs**

RTS contacts Hispanic CBOs, including the UF English Language Institute, Santa Fe College Adult Education for Speakers of Other Languages (ESOL), and local food service businesses for information. Through this method, RTS has learned that improving wayfinding and navigational material constitutes the most important need, in addition to enhancing services during the weekend. Overall, there is benefit in having all RTS material translated to Spanish, such as event notices and service change announcements (which the agency now provides). RTS has also translated fare payment instructions and provide information in Spanish language on agency website.

**FACTOR 3**

**Assessment of the Nature and Importance of the Transit Services to the LEP Population**

RTS provides the following programs, activities and services:

- **Transit Services:** Public transportation is vital to many people’s lives. According to the Department of Transportation’s Policy Guidance Concerning Recipient’s Responsibilities to LEP persons, providing public transportation access to LEP persons is crucial. An LEP person’s inability to utilize public transportation effectively may adversely affect his or her ability to access health care, education, or employment. As a result, RTS provides transit services to meet the needs of the community, including LEP persons.
- **Interpretation services by telephone:** RTS added interpretation call service in July 2013. For this reporting period, the most frequent interpretation calls were in Spanish, Haitian Creole, and Vietnamese. According to FY2023 Language Line call data, calls in Spanish totaled 5,037 minutes, and all Vietnamese calls totaled 59 minutes. However, in FY2024, there were 378 calls and calls in Spanish (97.10%) totaled 8,053 minutes with Haitian Creoles totaling 56 minutes with three (3) calls. The Citywide language line service covers the entire RTS service area.

- **RTS Website:** The website has travel training guide and provides trip planning tool to assist individuals to easily navigate the site. This allows them to plan their trip by inputting trip origin/destination. The result shows what buses to ride, nearby stops and scheduled arrival times of buses, and other amenities such as bicycle and electric scooter locations. It also shows the bus route in case the traveler wishes to make intermediate stops. In addition, the web site has fare schedule information in major languages.
- **Driver/Customer Service Staff training to respond to immediate needs:** RTS provides bus evacuation information in LEPs' major languages. Given the makeup of RTS driver workforce, a good number of drivers also speak other than the English language and are great assets in meeting the needs of LEP persons. For example, driver nametags let patron know that the driver is available and ready to provide on the spot translation services, as appropriate.
- **Bus Annunciation:** RTS buses are equipped to announce in-bus destinations, bus stops, guidance on getting off the bus and safety tips in languages other than English. These announcements reduce the frequency at which customers interact with bus drivers with questions while the bus is en-route. This improves safety as it reduces driver distraction.
- **Complaint processes in major languages:** RTS' complaint process is explained in other languages to facilitate the process (see Complaint Form, Appendix D).
- **Interpreters at public/community meetings:** Through the City of Gainesville, interpreters are provided at public meetings to assist community members who have limited ability to speak and/or understand the English language.

Based on past experience serving and communicating with LEP persons, and interviews conducted as part of RTS transit planning services, the agency has learned that the following routes, in addition to services provided in the preceding discussion, continue to be of particular importance to LEP customers in the community, and those are Routes 1, 5, 6, 12, 20 and 35. Again these individuals and low income/minority residents are spatially distributed throughout RTS' service area. Incidentally, these routes connect the existing transfer stations and major shopping centers and pass through the University of Florida.

The following are the most critical services provided by RTS for all customers, including LEP persons:

- Safety and security awareness instructions
- Emergency evacuation procedures
- Public transit services
- ADA paratransit services (as a pass-through agency)
- Vanpooling services (as a pass-through agency)
- Microtransit Last Mile/First Mile on-demand services currently target low income and minority/LEP neighborhoods with limited fixed route services

#### FACTOR 4

##### Assessment of Resources Available to the Agency and Costs

RTS currently provides the following LEP services as part of Transit Operations and Customer Services:

- The RTS website is available in over 200 languages using the Google translation widget.
- System maps and bus schedules in major languages.
- Title VI Notice to the Public, Title VI Complaint Procedure, and (Title VI) Complaint Form in Spanish and Chinese;
- Phone Translation Services for Customer Service calls made to RTS.
- Pictographs and signs in vehicles depict and emphasize common instructions.
- Enhanced bus annunciation

Universal symbols to convey system information



We anticipate that these activities (and cost) may increase as follows:

- Call charges for RTS interpretation services increase and, as service area expands;
- Requests for telephone calls for translation services increases;
- As RTS acquires and installs/upgrades additional communication software to enhance bus services; and,
- As the agency expands services to existing transit deserts relying on on-demand service system.

Based on the analysis of demographic data and contacts with community organizations and LEP persons, RTS has determined that no additional LEP functional service areas may be needed in order to provide existing services. RTS appears to cover those areas relevant for LEP persons (and others) to benefit from services provided by the agency, even as the agency considers expanding the MOD (Mobility on Demand) service structure.

### ***LEP Implementation Plan***

Through the four-factor analysis, RTS determined that the following types of language assistance are most needed and feasible and are being delivered:

- A. Translation of vital documents into Spanish. These documents include
  - Fare structure
  - How to ride the bus
  - Transit Apps and Trip planning
  - Printed materials on ADA Paratransit service
  - Bus emergency evacuation
- B. Language Line Translation Services for telephone contacts

### ***Staff Access to Language Assistance Services***

RTS drivers provide a diversity of language backgrounds. As front line staff, they have access on the bus to multiple documents that they can make available to LEP people. Customer Service Representatives at the two RTS transfer stations have information about City of Gainesville/RTS Language Line Translation Services for telephone contacts. Moreover, line staffs are willing to assist candidates who need translation during driver (operator) job interviews.

### ***Responding to LEP Callers***

These callers typically have a friend or relative dial the phone. They help them to explain what language the actual caller needs help with. The city has a list of individuals who will be contacted through Telephone Translation services. The program has an on-line easy-to-follow steps to complete calls.

### ***Responding to Written Communications from LEP Persons***

Based on RTS records, the agency rarely receives written communication in other than English.

### ***Responding to LEP Individuals in Person***

Lobby clerks have been trained on how to handle visits by LEP persons. Typically, an LEP person arrives with a friend or relative who is relatively more fluent in English. Lobby Clerks have a list of administrative staff and drivers who are fluent in the major languages. They are called upon to serve as interpreters for the visitor.

### ***Staff Training***

In addition to printing brochures, Marketing Staff also provides training to RTS staff that addresses:

1. Awareness of the type of language services available and how LEP persons can obtain these services.
2. How to respond to calls from LEP persons.
3. How to document encounters with LEP persons.
4. How to respond to a Title VI complaint (found at <http://go-rts.com/title-vi/>)

In addition, each summer all operators participate in a weeklong training course that includes a presentation on Title VI

responsibilities. During the course, City staff present information regarding Title VI requirements to operators. Operators are reminded of the availability of translated schedules, a phone translation service, and the requirement to notify dispatch of all encounters with LEP persons. Each Title VI presentation is followed by a question-and-answer session that go over appropriate and inappropriate responses to LEP individuals, as well as ideas for better interaction with these customers. From these interactions, RTS develops, distributes and has available information brochures/handouts/leaflets on frequently asked transit questions in English, Chinese, and Spanish.

A similar training is provided to all RTS customer service representatives (CSR). Like the transit operator course, the CSR course includes information regarding Title VI and how CSRs should interact with LEP people. Moreover, CSRs are provided with a list of all staff members who can provide language assistance services, as well as information regarding where they can access all Title VI documents, such as RTS's Title VI Notice to the Public, Title VI Complaint Procedure, and Title VI Complaint Form.

### ***Providing Notice to LEP Persons***

LEP persons are notified of the availability of language assistance through the following:

- RTS Title VI policy statement included on agency's vital documents
- On RTS website, with links to translations of vital documents in other languages
- Through signs posted on RTS vehicles and in customer service and administrative offices
- Through ongoing outreach efforts to community organizations and institutions
- Use of an automated telephone menu system in the most common languages encountered
- RTS language translation line identified on all materials and
- Staffing a table with bilingual staff at community service events of interest to LEP groups

### ***Monitoring, Evaluating and Updating RTS LEP Plan***

At least every three years, this plan is updated to reflect LEP community needs identified through feedback, demographic data and resource priorities. RTS will review staff and phone translation service records to assess the number of encounters with LEP persons (by language) specifically experienced by RTS. RTS will also assess the rate at which it distributes translated materials, including online and electronically. It will be important for RTS to consider if continued low consumption of these materials is due to the relatively small proportion of LEP individuals in the RTS service area, or other possible factors. RTS will continue to enhance use of modern technology to increase the accessibility of LEP material and information. Additionally, continuous collaboration and consultation with relevant Community Based Organizations will be critical to the evaluation and update to assist in gauging the adequacy of LEP services provided by RTS. It is important to note that certain services will always be provided regardless of their consumption rate, like the translated Title VI notice and form, while others may be adjusted, like the number of hard copies of translated brochures, as these could be done through Google Translate. Irrespective of this assertion, as the community grows and new LEP groups emerge, RTS will strive to address the needs for additional language assistance.

### ***Minority Representation on Planning and Advisory Bodies***

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

The RTS Citizen's Advisory Board (CAB) is appointed by the Gainesville City Commission. Open vacancies are duly advertised and applicants are evaluated and appointed by the Board during a public meeting. The Board can only evaluate applicants who have formally applied to fill the open vacancy; therefore, this criterion may not apply.

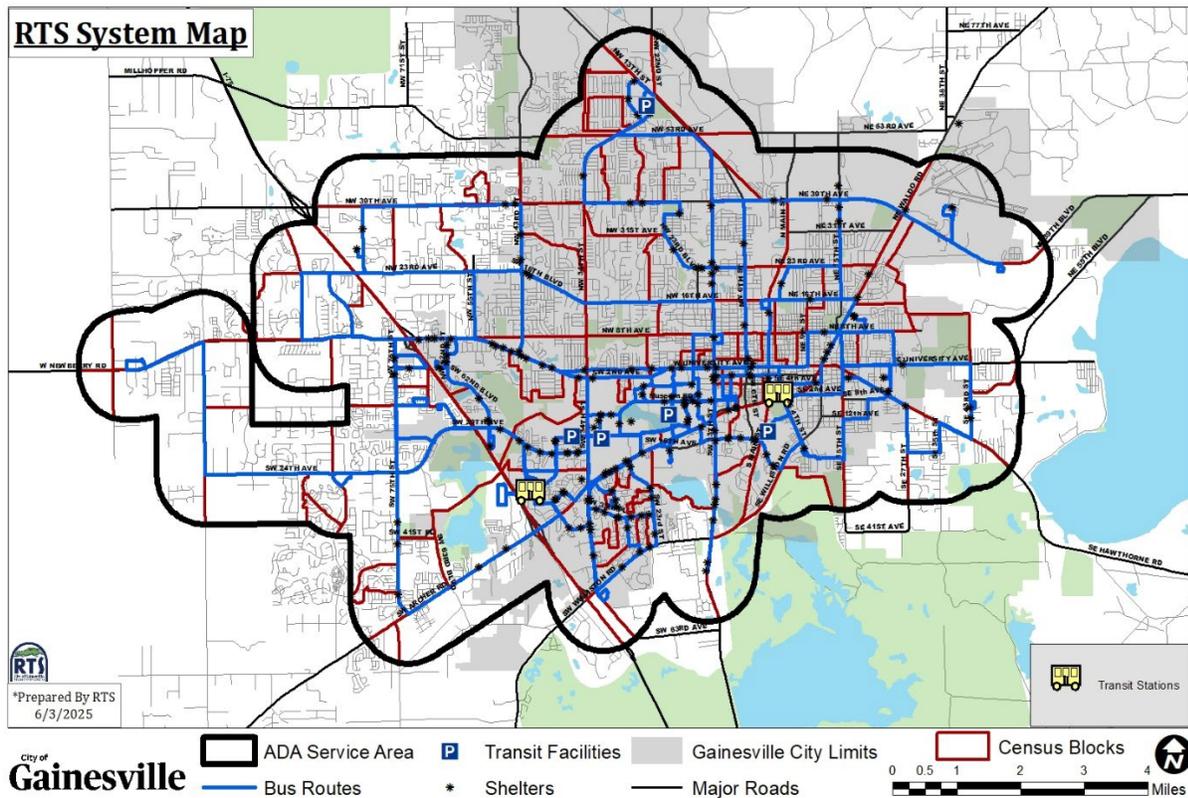
## VIII. SERVICE STANDARDS

Service Standards include Vehicle load, On-time performance, Service availability and Vehicle Headway; and, Service Policies will focus on Transit amenities, and Vehicle assignment

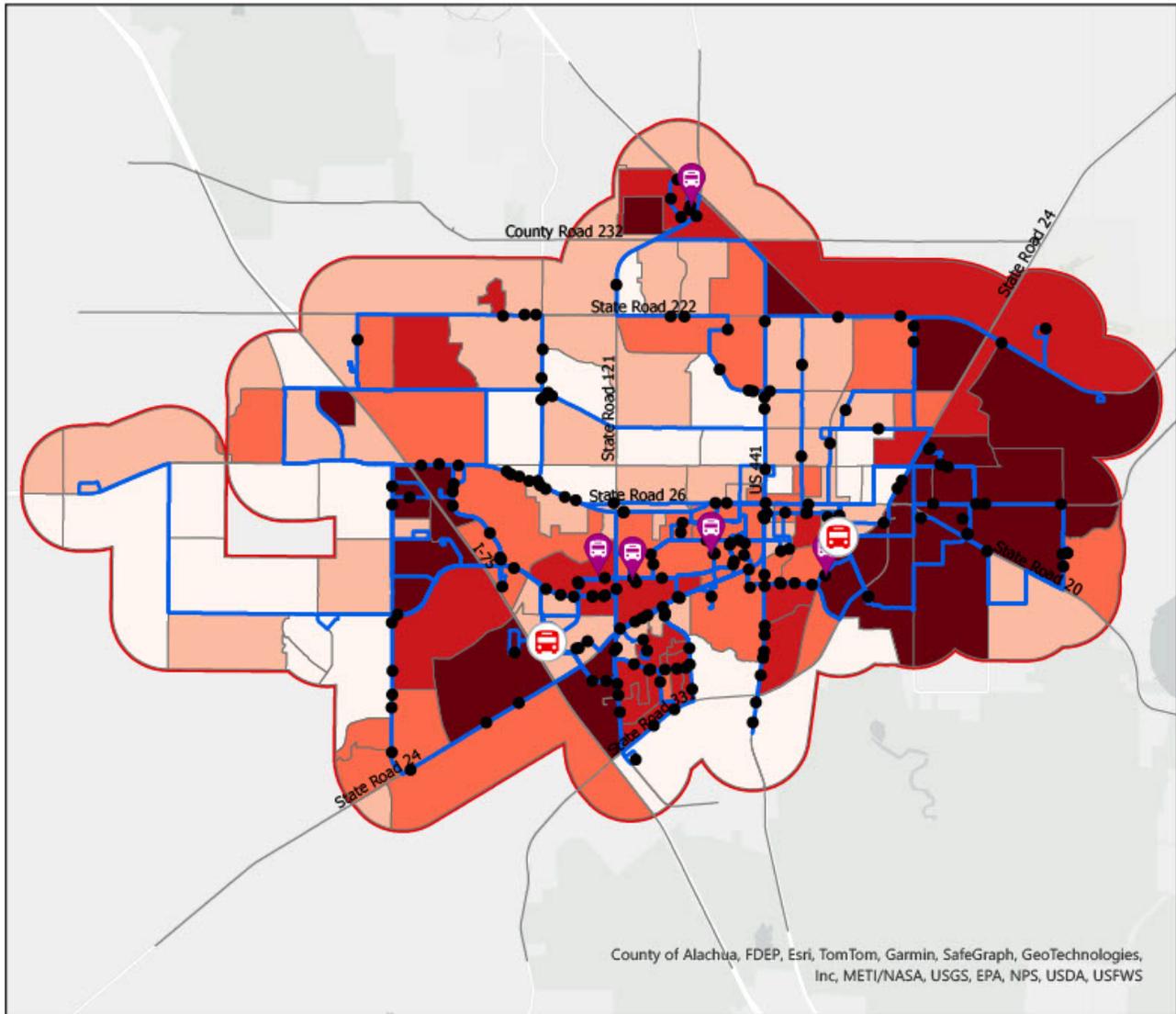
RTS is required to plan and deliver transportation services in an equitable manner. This means that the distribution of service levels and quality is to be equitable between minority and low-income populations and, the overall population. RTS has reviewed its services and policies to ensure that those services and benefits are provided in an equitable manner to all persons.

### *Existing Service Standards*

The agency has set standards and policies that address how services are distributed across the transit system service area to ensure that the distribution affords users equitable access to these services. As shown in the following maps, the agency’s routes appear to serve low income and minority areas. The first map is the system map and it shows the entire alignment or route system. Subsequent maps show the same route system map but with low income and minority populations superimposed on the route or system map. Looking at RTS bus routes shown in the RTS System Map, and comparing the services provided in major LEP, minority and low income areas to those provided in other parts of the service area, it is certainly acceptable to say that RTS routing system are equitable and provide good coverage in all areas with the highest concentration of minority and low income transit users. Even when funding challenges necessitate service restructuring, RTS endeavors to mitigate service change impacts to minimize disparate and disproportionate impacts. RTS keeps an eye on providing and maintaining adequate services for customers. Notice the spatial distribution (last map) of Low Income and Minority Households vis-à-vis RTS system bus routes.



# Minority Population

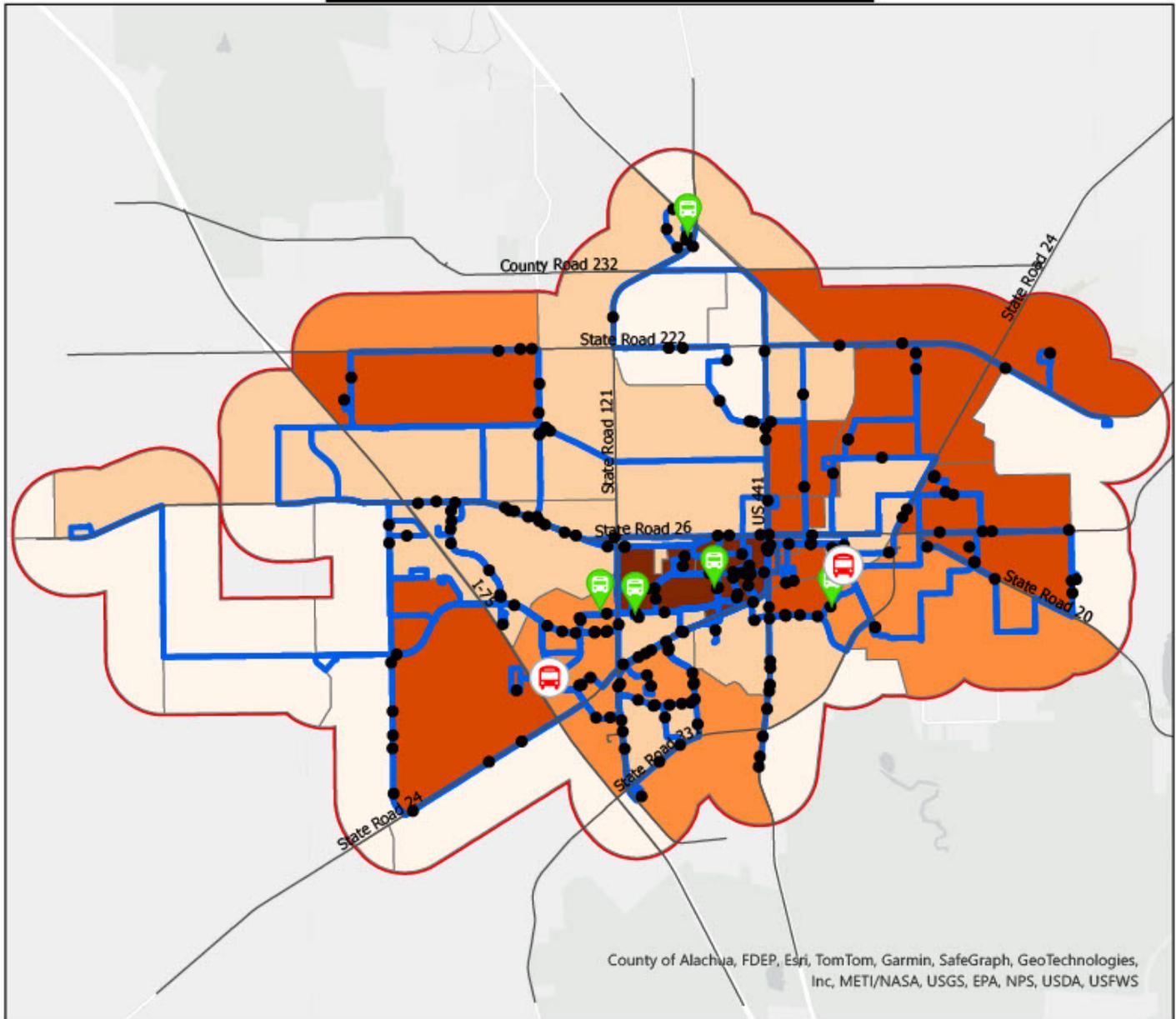


County of Alachua, FDEP, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Source: Census 2023 and 5-Year American Community Survey grown to represent 2025 conditions  
 Employment Data Source: 2022 Employment data grown to represent 2025 conditions

<ul style="list-style-type: none"> <li>● Shelters</li> <li> Transit Facilities</li> <li> Transit Stations</li> </ul>		<p><b>Minority Population Percentage</b></p> <ul style="list-style-type: none"> <li> 0 - 21%</li> <li> 22 - 33%</li> <li> 34 - 46%</li> <li> 47 - 66%</li> <li> 67 - 95%</li> </ul>	<ul style="list-style-type: none"> <li> Major Roads</li> <li> RTS Bus Routes</li> <li> RTS Service Area</li> </ul>
<p>City of <b>Gainesville</b></p>			

# Zero Vehicle Households



County of Alachua, FDEP, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

Source: Census 2023 and 5-Year American Community Survey grown to represent 2025 conditions  
 Employment Data Source: 2022 Employment data grown to represent 2025 conditions

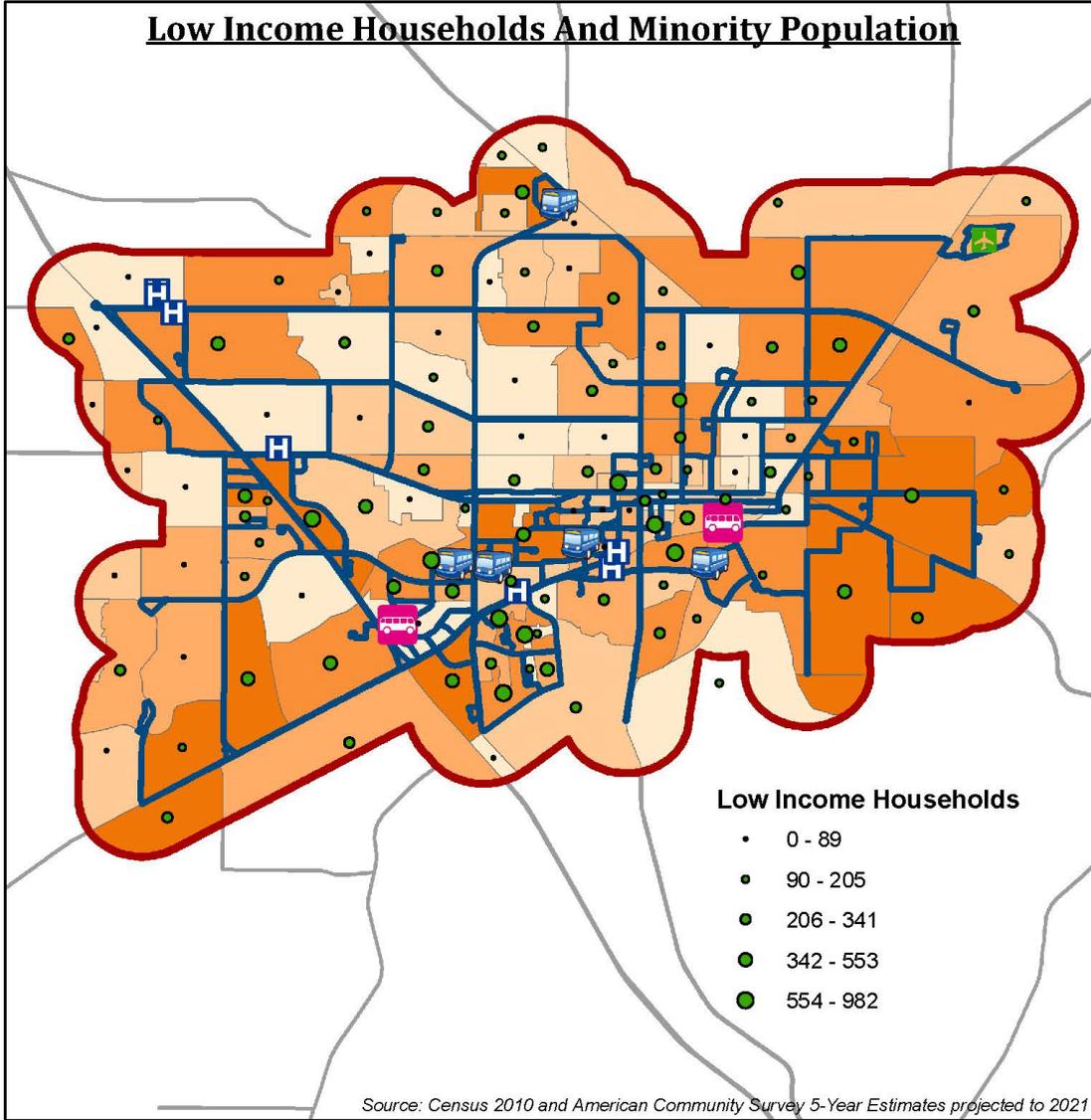
<ul style="list-style-type: none"> <li>• Shelters</li> <li> Transit Facilities</li> <li> Transit Stations</li> </ul>	<h3>Zero Vehicle Households Percentage</h3> <ul style="list-style-type: none"> <li> 0 - 3%</li> <li> 3 - 9%</li> <li> 9 - 15%</li> <li> 15 - 25%</li> <li> 25 - 55%</li> </ul>	<ul style="list-style-type: none"> <li> Major Roads</li> <li> RTS Bus Routes</li> <li> RTS Service Area</li> </ul>
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City of **Gainesville**

0 1.25 2.5 5 Miles

# Map of Study Area

## Low Income Households And Minority Population



### Low Income Households

- 0 - 89
- 90 - 205
- 206 - 341
- 342 - 553
- 554 - 982

### Minority Population

- 39 - 292
- 293 - 530
- 531 - 873
- 874 - 1377
- 1378 - 2489

- Bus Routes
- Major Roads
- RTS Service Area
- Transit Facilities
- Transit Stations

- Airport
- Hospital

City of  
**Gainesville**

0 0.00275 0.0055 0.011 Miles



In addition, the agency's demand response services are available to all callers on a first-come first serviced basis, without regard for race, color or national origin.

The following system-wide service policies, standards and procedures are used to guard against service design or operations decisions from having disparate impacts or disproportionate burden on relevant demographic groups. (For complete information on Service Standards, See Appendix I). All RTS services are designed to meet the agency's established standards; thus, it is judged that services are provided equitably to all persons in the service area, regardless of race, color or national origin.

- **Vehicle load** - Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. RTS standard for maximum vehicle load is 1.12 to 1.25, and all of RTS services attempt to meet this standard. This could be challenging for University of Florida and Santa Fe College routes at the beginning of the semester as new students adjust to campus life and some students may still be evaluating whether or not they want to stay or abandon school. As the term progresses and student counts decline, vehicle load tends towards the lower end of the range. An additional constraint that affects load factor is service restructuring that eliminates and/or combines existing routes.
- **Vehicle headway** - Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service. The standard for RTS vehicle headways is 20 - 60 minutes, and all RTS services strive to meet this standard. Time points established along the routes and use of modern technology contribute to the achievement of the goal.
- **On-time performance** - On-time performance is a measure of runs completed as scheduled. This criterion first must define what is "on time" by the individual agency. The standard for on-time service at RTS is +1 to -5 minutes. The agency standard is 80%, but not all RTS services meet this standard. In FY24, during the weekday system wide average OTP was 63.1%, with 11.4% early and 25.5% late. On Saturdays, the average on-time performance was 60.6% compared to 65% on Sundays. Buses were late 30% of the time on Saturdays compared to 26% on Sundays.
- **Service availability** - Service availability (also known as span of service) is a general measure of the distribution of routes within a transit provider's service area. In FY24, weekday span of service at RTS was 5:45 – 11:30 PM and all of RTS services met this standard, (Agency Fare and Service Change Policy is included in Appendix J)

### ***Service and Operating Policies***

RTS service and operating policies also ensure that operational practices do not result in discrimination on the basis of race, color, or national origin.

- **Distribution and Siting of Transit Amenities** - Transit amenities refer to infrastructure that provides comfort, convenience, and safety that are available to the general riding public. RTS has a policy to ensure the equitable distribution of transit amenities across the system. This policy applies to seating (i.e., benches, seats), bus shelters and canopies, the provision of information and Intelligent Transportation Systems (ITS), and waste receptacles (including trash and recycling). Passenger amenities are sited based on customer convenience, ridership demand, and vehicle speed. Closely spaced stops reduce walking distance but slow buses down, while stops spaced further apart increase walking distance but speed buses up. For bus stops, the system wide standard is six (6) to eight (8) stops per mile or 660-800 feet between stops. This interval will fluctuate depending on the presence or absence of trip generators and safety, accessibility concerns and levels of service restructuring due to financial constraints. When the route system is modified, it leads to elimination and/or combination of routes which affects the distance between remaining stops. In addition, bus stops with less than an average of five (5) daily passenger boarding over a year period are typically reviewed for elimination and/or consolidation.
- **Distribution and Siting of Fixed Facilities** – RTS shall complete a Title VI equity analysis during the planning stage regarding where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Facilities include, but are not limited to storage facilities, maintenance facilities, and operations centers. Facilities do not include bus shelters but transit stations and power substations, etc. are evaluated during project development of the NEPA process.

- Vehicle assignment refers to the process by which vehicles are placed on routes throughout the transit system. Assignment standards relate to vehicle age, which serves as proxy for condition and comfort. RTS uses a 12-year lifespan for all standard 40-foot buses and seeks to implement this standard within existing financial constraints to combat fuel economy and maintenance issues associated with older vehicles. RTS provides Automatic Vehicle Location (AVL) services to its patrons. In FY 2024, the agency operated 86 vehicles in peak service and all 140 buses are AVL-equipped. Moreover, RTS utilizes APC (Automatic Passenger Count) technology to collect passenger information and all buses are equipped with these units. These buses are rotated to cover all system service attributes (weekday, weekend, Holiday, Reduced Service, short/long routes, span of service, rural/urban) to capture and reflect accurate, characteristic customers on all service routes.
- RTS assigns vehicles to its fixed route bus system with the goal of providing equitable benefits to minority and low-income populations. Vehicles are assigned regarding ridership demand patterns as routes with greater numbers of passengers need vehicles with larger capacities. For each type of assignment, newer vehicles are rotated to ensure that no single route or service always has the same vehicle. Also, low-floor buses are deployed along routes with elderly and/or those in wheelchairs, or those who need help to board the bus. RTS Title VI Manager routinely reviews vehicle assignments to ensure that vehicles are indeed being rotated and that no single route or service always has the old or new vehicles and meet other assignment criteria.

### ***Fare and Service Changes***

RTS follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, RTS considers the relative impacts on, and benefits to minority and low-income populations, including LEP populations. All planning efforts for changes to existing service or fares, as well as new services, have a goal of providing equitable service, (See Appendix J for Fare and Service Change Policy). In Fall 2025, RTS made a major change to its service and has completed the required Title VI Equity Analysis for the service change.

The service change has resulted in elimination and/or combination of routes and route reconfigurations to accommodate customers affected by the change. Most of the eliminated routes serve the University of Florida community. Although the routes are no longer controlled by RTS, customers will continue to receive transit services under UF Campus Connector Service system. The service restructuring was necessitated by a funding reduction (from 49.2% in FY24 to a projected 36.9% in FY25) in UF financial contribution to RTS service operating budget. The Title VI Equity Analysis report and supporting documents are hereby submitted as Appendix K.

**IX. APPENDICES**

*Appendix A: City of Gainesville Equal Opportunity Complaint Policy*



Equal Opportunity Policies

Number EO-8

## **Equal Opportunity Complaint Policy**

The City is committed to maintaining a workplace free of discrimination, harassment, and inappropriate behavior on the basis of race, color, gender, age, religion, national origin, marital status, sexual orientation, disability, or gender identity (protected characteristics). The City is responsible for ensuring that all actions dealing with personnel and employment practices will be in accordance with equal employment laws, policies, and procedures and that services, programs and activities will be in accordance with applicable laws, policies, and procedures.

Employees and applicants for employment and citizens utilizing City services will be given the opportunity to voice complaints of discrimination, harassment, or inappropriate behavior. Such complaints will be given prompt and full consideration and every effort will be made to resolve them rapidly. Employees, applicants, or citizens registering complaints of discrimination, harassment or inappropriate behavior will be free from reprisal, harassment, intimidation, or retaliation. The receipt, investigation and resolution of complaints shall be in accordance with equal opportunity laws, policies, and procedures. The Equal Opportunity Department Director shall develop procedures for investigation of complaints.

An employee, applicant, or other individual maintains the right to file a complaint with an outside agency or to use existing collective bargaining procedures, as applicable, at any stage in the complaint process.

In carrying out the City's formal or informal Equal Opportunity Complaint investigations, all information either received, solicited, or compiled during the course of said investigation, whether in written, oral, or other form, will be protected and remain strictly confidential to the extent allowed by Florida law. All City employees are required to cooperate fully with the Equal Opportunity Department during any formal or informal investigation.

Formal Complaints:

1. The affected employee or citizen will complete a "Complaint of Discrimination" form in the Equal Opportunity Department within one hundred-eighty (180) days of the employee's or citizen's knowledge of the alleged act of Discrimination.
2. The Charter Officer or designee will have ten (10) working days from receipt of the complaint and request in which to provide information and/or documents requested by the Equal Opportunity Department Director. Any additional requests for information and/or documents should be completed within the timeframe specified by the Equal Opportunity Department Director. The response deadlines may be extended by the Equal Opportunity Department Director.
3. The Equal Opportunity Department Director or designee, may work alone or in conjunction with other investigator (s) selected by the Equal Opportunity Department Director to conduct a formal investigation of the alleged charges, which may include an informal hearing of persons involved, and on-site interviews of other employees who may have witnessed the alleged discriminatory act(s). If other investigators are used, they will work under the direction and supervision of the Equal Opportunity Department Director or designee and all investigative plans, interviews, requests for information, work, and scope of work will be coordinated and approved through the Equal Opportunity Department Director or designee. All reports of the investigator(s) will be submitted to the Equal Opportunity Department Director or designee.
4. The complainant and the alleged discriminating party may give a list of witnesses to be interviewed by the Equal Opportunity Department Director or other investigator(s) in support or denial of the charge(s) of discrimination. Also, any documents related or pertinent to the allegation(s) should be submitted to the Equal Opportunity Department Director or designee.
5. Prior to completing the final written investigation report, the Equal Opportunity Department Director will meet with the Charter Officer or designee and will consult with the City Attorney's Office regarding the preliminary results of the investigation. The Charter Officer or designee will be allowed to present additional information.
6. Upon completion of the investigation, the Equal Opportunity Department Director will submit a written investigative report of findings directly to the Charter Officer. If the complaint makes personal and direct allegations against a Charter Officer, the written investigative report will be submitted to the City Commission by the Equal Opportunity Department Director and the City Auditor.
7. If the complaint is against an employee working under the Charter Officer, the respective Charter Officer will meet with the Equal Opportunity Department Director to discuss the complaint or report. The Charter Officer will issue a written response directly to the Equal Opportunity Department Director and the complainant within fifteen (15) working days after receipt of the Equal Opportunity Department

Director's written investigative report.

Investigation Coordination:

If the investigation will be conducted by external investigators, the Equal Opportunity Department Director shall prepare the necessary paperwork and develop any evaluative criteria to be used. The Equal Opportunity Department Director shall be responsible for selecting the investigator(s). The Equal Opportunity Department Director shall receive the report(s) of the investigator(s) and ensure that any contractual terms have been fulfilled. Funds for contracting with external investigators will be allocated in the Equal Opportunity Department's budget.

Informal Complaints:

Informal Complaints are complaints that have not been notarized. An employee/applicant or citizen who believes that he/she is the victim of discrimination may informally contact the Equal Opportunity Department Director or designee or a supervisor or manager. The Equal Opportunity Department Director or designee will attempt to resolve the issue or concern, if necessary.

Confidentiality of Negotiations for Resolution:

During formal negotiations for resolution of formal or informal complaints, offers and statements made by parties shall not be used by or against either party if resolution attempts fail. Parties involved in resolution attempts should be given the opportunity to explore reasonable avenues of relief.

Effective Date: 06/26/00  
Revised: 03/28/08  
Revised: 09/04/08  
Revised: 08/18/16

## **Appendix B: Public Notice in Other Languages**

### **Title VI Notice to Public - Spanish Version**

Titulo VI Aviso al Publico del Sistema de Transito Regional de Gainesville



RTS opera sus servicios de transito sin tomar en cuenta raza, color, o nacionalidad de acuerdo con la sección Título VI de la Ley de Derechos Civiles de 1964 y sus enmiendas.

#### RTS Título VI Declaración

La sección Título VI de la Ley de Derechos Civiles dice:

“Ninguna persona en los Estado Unidos será, por motivos de raza, color o nacionalidad, excluida de participar, negada beneficios o ser sometida a actos de discriminación en los programas o actividades que reciben asistencia financiera federal.”

RTS promete cumplir con los requerimientos de Título VI en todos sus programas financiados con dinero federal.

#### Realizando una Queja de Título VI

Cualquier persona que cree que ha sido, o que un grupo de personas específicas han sido, víctimas de discriminación que es prohibida por la Ley de Derechos Civiles de 1964 puede presentar una queja escrita. Dicha queja debe de ser presentada por escrito e archivada con la Oficina de Igualdad de Oportunidades (Office of Equal Opportunity) dentro de 180 días después del acontecimiento de la supuesta discriminación.

**Internet:** La Forma de Quejas de Título VI o el Procedimiento de Quejas de Título VI pueden ser encontrados en: <http://go-rt.com/feedback-page/#titlevi>

**Dirección de correo:** City of Gainesville, Office of Equal Opportunity, PO Box 490, Mail Station 52, Gainesville, FL 32602

**Teléfono:** Para pedir una Forma de Quejas de Título VI llame al (352) 334-5051

**Email:** Para mandar un email a la Oficina de Igualdad de Oportunidades para pedir una Forma de Quejas de Título VI, envíe su mensaje a [equalopportunity@cityofgainesville.org](mailto:equalopportunity@cityofgainesville.org).

#### **Cómo presentar una queja de Título VI**

Se pueden presentar quejas por discriminación por motivos de raza, color, origen nacional o idioma. Cualquier queja de este tipo deberá presentarse por escrito a más tardar 180 días después de la fecha en que la persona cree que ocurrió la discriminación. Las quejas por escrito se presentarán a la Oficina de Igualdad de Oportunidades de la Ciudad de Gainesville.

Todas las llamadas telefónicas, visitas o correos electrónicos con respecto a una queja del Título VI se dirigirán a la Oficina de Igualdad de Oportunidades de la Ciudad de Gainesville. La persona que desee presentar una queja debe

completar y firmar un Formulario de queja del Título VI y devolverlo por correo a la dirección que figura en el formulario o dejarlo en la Oficina de Igualdad de Oportunidades del Ayuntamiento. El Formulario de queja del Título VI se puede recoger en la dirección del Edificio de la Biblioteca anterior a continuación o descargarse del sitio web de RTS en: <http://www.go-rts.com/feedback.php#titlevi>.

Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja ante: Oficina de Derechos Civiles, Atención: Coordinador del Programa del Título VI, Edificio Este, 5to Piso-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

**Title VI Notice to Public - Chinese Version**



**甘城公共交通系统(RTS)关于民权法案第六章对公众的通告**

甘城公共交通系统(RTS)为甘城人们提供公共交通服务, 不分种族, 肤色, 宗教, 性别, 性取向, 国籍, 婚姻状况, 年龄或残疾, 与1964年民权法案及其修正案保持一致。RTS民权法案第六章1964年民权法案声明:

“在美国, 任何人都不得被禁止参与接受联邦资助的活动和项目, 或者被禁止享受由联邦资助项目所带来的好处, 或者在联邦资助项目中受到歧视基于其种族, 肤色或民族等原因。”

甘城公共交通系统(RTS) 致力于在其所有的联邦资助项目和活动中遵守该条款针对民权法案第六章进行投诉任何人, 如果觉得自己或者某一类人在甘城公共交通系统(RTS)规划与使用联邦财政的过程中受到了为1964年民权法案及其相关修正案所禁止的歧视, 都可以提交书面投诉。任何书面投诉必须在歧视事件发生后的180天内写好并提交至在甘城平等机会办公室。民权法案第六章歧视投诉表单可以从下面提供的方法中获取: 网□□□□□: <http://go-rts.com/feedback-page/#titlevi>

□□□□□□□□ City of Gainesville, Office of Equal Opportunity, PO Box 490, Mail Station 52, Gainesville, FL 32602

□□□□□□□ : (352) 334-5051

□□□□□□□ email) □□□□□□□ equalopportunity@cityofgainesville.org

**如何提交标题VI投诉**

投诉可以根据种族, 肤色, 国籍或语言提交歧视。任何此类投诉应在该人认为发生歧视之日起180天内以书面形式提交。书面投诉应提交给平等机会办公室盖恩斯维尔市。

有关Title VI投诉的所有电话, 步行或电子邮件均应发送至盖恩斯维尔市平等机会办公室。希望提出投诉的人必须填写并签署标题VI投诉表, 并通过邮件将其寄回表格上的地址, 或将表格放在市政厅平等机会办公室。标题VI投诉表可以在下面的图书馆大楼地址领取, 也可以从RTS网站下载: <http://www.go-rts.com/feedback.php#titlevi>。

投诉人可以通过以下方式直接向联邦运输管理局投诉:

公民权利办公室, 注意: 东区五楼TCR第六章计划协调员,

新泽西州新泽西州大街1200号, 华盛顿特区20590

***Appendix C: Letter of Non-Sub Recipient to FTA***



**Regional Transit System**  
PO Box 490, Station 5  
Gainesville, FL 32627-0490  
(352) 334-2609  
(352) 334-3681 (fax)  
[www.go-rt.com](http://www.go-rt.com)

August 16, 2021

Michele Foster, Regional Civil Rights Officer  
FTA Region IV – Atlanta  
230 Peachtree Street, NW, Suite 1400  
Atlanta, GA 30303

Dear Ms. Foster:

Re: RTS and Sub-recipients

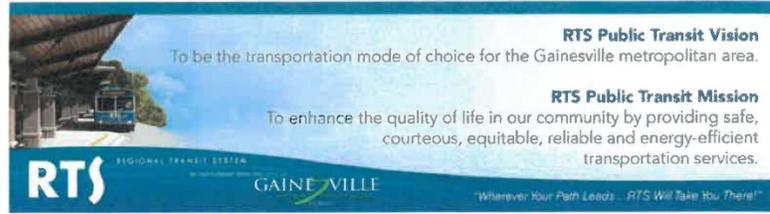
RTS does not have any sub-recipients to provide monitoring and assistance. Therefore, in the future, if RTS has sub-recipients, we will provide assistance and monitoring in areas as required by FTA Circular Letter 4702.1B.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jesus Gomez".

Jesus Gomez, Transit Director  
Regional Transit System  
Email: [gomezjm@cityofgainesville.org](mailto:gomezjm@cityofgainesville.org)

**Appendix D: Complaint Form**



**Title VI Complaint Form**

RTS se compromete a garantizar que ninguna persona es excluida de la participación en o negada los beneficios de sus servicios sobre la base de raza, color u origen nacional, conforme a lo dispuesto por el título VI de la ley de derechos civiles de 1964, enmendada. Quejas de título VI deben ser presentadas dentro de 180 días desde la fecha de la supuesta discriminación

Nota: La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, por favor llame la oficina de igualdad de oportunidades al (352) 334-5051. Llenar y devolver este formulario a la ciudad de Gainesville oficina de igualdad de oportunidades: 222 E. University Avenue, Gainesville, FL 32602.

- 1.-Nombre del que pone la queja \_\_\_\_\_
2. Dirección \_\_\_\_\_
3. Ciudad, Estado y Zona Postal \_\_\_\_\_
4. Número de Teléfono ( Del hogar) \_\_\_\_\_ (Del trabajo) \_\_\_\_\_
5. Persona discriminada (si es alguien que no es el que pone esta queja)  
Nombre \_\_\_\_\_  
Dirección \_\_\_\_\_  
Ciudad, Estado y Zona Posatal \_\_\_\_\_
6. Cuál, cree usted, de los siguientes incisos describe la razón de la discriminación que tuvo lugar? Esta fue debido a:
  - a. Raza \_\_\_\_\_
  - b. Color \_\_\_\_\_
  - c. Nacionalidad de origen (idioma inglés no competente) \_\_\_\_\_
7. En que fecha su alegato de discriminación tiene lugar? \_\_\_\_\_
8. En sus propias palabras, describir la discriminación alegada. Explicar lo que sucedió y que crees era responsable. Utilice la parte posterior de esta forma si se requiere espacio adicional.

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**9. Ha presentado esta queja con cualquier otro nivel federal, estatal o agencia local; ¿o con cualquier tribunal federal o estatal? \_\_\_\_Sí \_\_\_\_No**

**De responder si, marque todos en los que se relaciona su queja anterior:**

Agencia Federal  Corte Federal  Agencia Estatal  Corte Estatal  
 Agencia local.

**10. Sírvanse facilitar información sobre una persona de contacto en la Agencia/tribunal donde se presentó la queja**

**Nombre** \_\_\_\_\_

**Dirección** \_\_\_\_\_

**Ciudad, Estado y Zona Postal** \_\_\_\_\_

**Número del Teléfono** \_\_\_\_\_

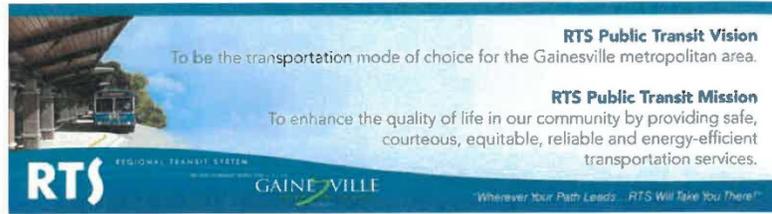
**11. Por favor firme abajo. Usted puede adjuntar cualquier material escrito u otra información que crees que es relevante para su queja**

\_\_\_\_\_  
**Firma del que pone la queja** **Fecha**

\_\_\_\_\_  
**Escriba con letra del molde el nombre del que pone la queja**

Fecha de recibida: \_\_\_\_\_

\_\_\_\_\_  
**Recibida por:** \_\_\_\_\_



## 条例六投诉表

根据1964年公民权利法修订案第六条规定，不论种族，肤色和国籍，区域公交系统将致力于保护所有人参与和享有服务的权利不被损害。条例六投诉必须在歧视声明日之后的180天内被受理。

备注：以下必要信息将有助于我们处理您的投诉。如果您需要任何帮助来完成这个表格，请拨打市平等权益保障办公室电话(352) 334-5051。请将完成的表格提交到市平等权益保障办公室。地址：222 E. University Avenue, Gainesville, FL 32602.

1.投诉人： \_\_\_\_\_

2.地址： \_\_\_\_\_

3.城市、州、 邮编： \_\_\_\_\_

4.家庭 电话： \_\_\_\_\_ 办公室电话： \_\_\_\_\_

5.被歧视人信息（如果非投诉者本人）

姓名： \_\_\_\_\_

地址： \_\_\_\_\_

城市、州、 邮编： \_\_\_\_\_

6. 以下哪项最能描述您受到歧视的原因？理由为：

a.种族 \_\_\_\_\_

b.肤色 \_\_\_\_\_

b.国籍（有限的英语表达能力） \_\_\_\_\_

7.歧视发生时间 \_\_\_\_\_

8. 请您描述该歧视事件，包括事件发生经过以及事件责任人。如果此页面不够，请继续填写在表格背面。

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9. 您是否在其它联邦、州立、或本地机构，或其它联邦、州立法院填写过此表格？

是  否

如果是，请勾选所有符合的选项：

联邦机构  联邦法院  州立机构  州立法院

本地机构

10. 请提供所在投诉受理机构/法院的联系人信息。

姓名： \_\_\_\_\_

地址： \_\_\_\_\_

城市、州、邮编： \_\_\_\_\_

电话： \_\_\_\_\_

11. 投诉人签名。您可以附带任何您觉得与此投诉案件相关的手写文件和信息。

\_\_\_\_\_  
投诉人签名

\_\_\_\_\_  
日期

\_\_\_\_\_  
投诉人姓名

受理日期： \_\_\_\_\_

受理人： \_\_\_\_\_

*Appendix E: Complaint Form (English)*

**RTS  
Title VI Complaint Form**

RTS 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 provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please contact the Office of Equal Opportunity by calling (352) 334-5051. Complete and return this form to the City of Gainesville Office of Equal Opportunity: 222 E. University Avenue, Gainesville, FL 32602.

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

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

3. City, State and Zip Code \_\_\_\_\_

4. Telephone Number (home) \_\_\_\_\_ (business) \_\_\_\_\_

5. Person discriminated against (if someone other than the complainant)

Name \_\_\_\_\_

Address \_\_\_\_\_

City, State and Zip Code \_\_\_\_\_

6. Which of the following best describes the reason you believe the discrimination took place?

Was it because of your:

a. Race \_\_\_\_\_

b. Color \_\_\_\_\_

b. National Origin (Limited English Proficiency) \_\_\_\_\_

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

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

If yes, check all that apply:

\_\_\_\_\_ Federal agency \_\_\_\_\_ Federal court \_\_\_\_\_ State agency \_\_\_\_\_ State court

\_\_\_\_\_ Local agency

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

Name \_\_\_\_\_

Address \_\_\_\_\_

City, State, and Zip Code \_\_\_\_\_

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

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

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

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print or Type Name of Complainant

Date Received: \_\_\_\_\_

Received By: \_\_\_\_\_

***Appendix F: Complaint Status***

COMBINED TITLE VI, ADA, EEO COMPLAINT STATUS REPORT

Internal RTS Complaints: FY 22 – FY25

Case #	Status	Date Filed	Disposition	Basis	
EO-I-2024-06	Closed	2/16/2024	No Cause	Race	

*Appendix G: Compliance Review*



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IV  
Alabama, Florida, Georgia,  
Kentucky, Mississippi,  
North Carolina, Puerto  
Rico, South Carolina,  
Tennessee, Virgin Islands

230 Peachtree St., N.W.,  
Suite 1400  
Atlanta, GA 30303  
404-865-5600  
404-865-5605 (fax)

July 29, 2024

Ms. Cynthia Williams Curry  
City Manager  
City of Gainesville (Gainesville RTS)  
PO Box 490, Station #6  
Gainesville, FL 32627-0490

**Re: Fiscal Year FY2024 Triennial Review– Final Report**

Dear Ms. Curry

I am pleased to provide you with a copy of this Federal Transit Administration (FTA) report as required by 49 U.S.C. Chapter 53. The enclosed draft report documents the results of the FTA's FY2024 Triennial Review of City of Gainesville (Gainesville) in Gainesville, Florida. Although not an audit, the Triennial Review is the FTA's assessment of Gainesville's compliance with Federal requirements, determined by examining a sample of award management and program implementation practices. As such, the Triennial Review is not intended as, nor does it constitute, a comprehensive and final review of compliance with program funding requirements.

Due to the Coronavirus 2019 (COVID-19) Public Health Emergency, the review was expanded to address Gainesville's compliance with the administrative relief and flexibilities FTA granted and the requirements of the COVID-19 relief funds received through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) of 2021, and the American Rescue Plan (ARP) Act of 2021.

The Triennial Review focused on Gainesville's compliance in 23 areas. Deficiencies were found in one (1) area: Legal. Gainesville had no repeat deficiencies from the FY2020/2021 Triennial Review.

Ms. Cynthia Curry, City Manager, Fiscal Year 2024 Federal Transit Administration (FTA)  
Triennial Review  
Page 1

Subsequent to the site visit, Gainesville provided corrective action responses to address and close deficiencies noted in the Legal area of the report that follows.

Thank you for your cooperation and assistance during this Triennial Review. If you need any technical assistance or have any questions, please do not hesitate to contact Ms. Tameka Wimberly, FTA Program Manager at 404-865-5472 or by email at [Tameka.Wimberly@dot.gov](mailto:Tameka.Wimberly@dot.gov).

Sincerely,



Yvette G. Taylor, Ph.D.  
Regional Administrator

cc: Tameka Wimberly, Program Manager, FTA Region IV  
Sherry Snyder, Lead Reviewer, Calyptus Consulting, Inc.

Enclosure

## ***Appendix H: Outreach Efforts***

### **Summary of RTS Outreach Efforts**

#### **2025 to Date**

05\_28\_25\_RTS CAB Meeting  
05\_19\_25\_Community Job and Resource Fair  
05\_08\_25\_Gtec\_SummerB  
05\_08\_25\_DBS\_Blind  
04\_04\_25\_UFService Change Summer  
04\_04\_25\_18\_65over SeniorCenter  
04\_01\_25\_3rd Annual Alachua County High School Senior Job Fair  
03\_26\_25\_RTS\_CAB  
03\_26\_25\_GNVHousing  
03\_19\_25\_Florida Guardian ad Litem  
03\_12\_25\_Santa Fe College Safe Spring Break  
03\_10\_25\_18\_65over SeniorCenter  
03\_04\_25\_18underWestwood  
03\_03\_25\_BuchholtzHS  
03\_01\_25\_COG\_SummerBlitz\_MLK  
02\_26\_25\_VisionZero Open House  
02\_25\_25\_EastsideHS\_Farefree  
02\_19\_25\_8th & Waldo Street project  
02\_17\_25\_AsktheCityKellyCenter  
02\_10\_25\_AsktheCityKellyCenter  
02\_07\_25\_Trenton Highschool  
01\_17\_25\_Meadowbrook

#### **2024**

12\_14\_24\_MLK\_GunViolence  
12\_12\_24\_Community FIRST Walk the Block Event in Phoenix  
12\_11\_24\_CONFIRMED Streatery Engagement  
12\_1\_24\_GNVHousing  
11\_21\_24\_Phoenix Turkey Bowl- and Crime Watch  
11\_14\_24\_Childrens Trust Job Fair  
11\_14\_24\_SF RunwithCops  
11\_12\_24\_Open House for University Avenue and West 13th Street  
10\_26\_24\_Community FIRST – Duval  
10\_23\_24\_VZ\_safety proclamation  
10\_09\_24\_GFR Screaming for safety  
10\_08\_24\_Library Job Fair  
10\_02\_24\_Dylan Roberts  
09\_18\_24\_CAB meeting at RTS  
08\_29\_24\_UF Housing  
08\_28\_24\_UFPD Tailgating for Safety  
08\_15\_24\_FDOT partners  
07\_17\_24\_RTS CAB meeting  
07\_12\_24\_Mayor media day  
07\_03\_24\_Greater Duval Neighborhood Assoc Youth Tour  
06\_27\_2024\_UF Interns Vision Zero field visit  
05\_30\_24\_BishopMiddleSchool  
05\_08\_2024\_Job Hiring Fair  
04\_11\_12\_24\_RTS reimagine  
03\_27\_24\_RTS CAB  
03\_23\_24\_GNV4AALL  
03\_18\_24\_HollyTrintySchool

03\_14\_24 Center for Independent Living  
03\_13\_2024 Job Hiring Fair  
03\_01\_24 Cooper Familytour of RTS  
02\_23\_24 Jobfair Library  
02\_20\_24 VisionZeroOpenHouse  
01\_24\_24 RTS CAB  
01\_18\_2024 JobFair

### **2023**

08\_29\_09\_13\_SFC PD  
08\_23\_25\_23\_FDOT\_UFPD\_ped  
08\_14\_23\_OUTREACHviaEmail  
07\_31\_thru8\_2\_23\_COVID Memorial  
07\_06\_23\_DuvalYouthGroup  
05\_26\_23\_Hampton Court Property jobfair  
05\_24\_23\_FallService\_RTS  
05\_16\_23\_FallService\_AHealth  
05\_15\_23\_Re-Entry Community Job and Resource Fair  
04\_14\_23\_Ray Massey Park GO  
04\_14\_23\_ADAemergencySFC  
04\_13\_23\_Orange&BlueGameDetours  
03\_27\_23\_Mayor\_GroveStreet  
03\_25\_23\_ShandsBikeRodeo  
03\_23\_23\_SFC\_ESOL  
02\_17\_23\_AlachuaLibrary  
02\_04\_23\_CityServicesFAir  
01\_23\_24\_25\_2023 Corridor walk  
01\_23\_23 Job Fair  
01\_11\_23 Job Fair

### **2022**

12\_10\_22\_Touch a truck  
12\_10\_22 Outreach - Recruitment Campaign  
12\_10\_22\_Touch a truck  
12\_01\_22\_RosaParks Day  
11\_19\_22\_COGartfest\_EV  
11\_9\_22\_SFC runwiththecops  
10\_19\_22\_Goverment day  
09\_08\_22\_SFC Jobfair  
07\_27\_22\_CAB  
07\_7\_22\_RTS\_Duval  
07\_05\_22\_Catholiccharities  
06\_30\_22\_PORTER'S Transportation Meeting  
06\_18\_2022\_Juneteeth freedom walk  
06\_14\_2022\_SugarHillCommunityEngagement  
04\_27\_22\_24route  
04\_20\_22\_BoDiddley\_GNV\_Downtown  
04\_6\_22\_Compass  
03\_24\_2022\_Senior center

## **RTS Service Standards**

The RTS service standard framework includes measures or policies related to route design, bus stop and amenity provision, service delivery, safety and customer satisfaction, and effectiveness and efficiency. Depending on the measure, standards either represent a minimum or maximum threshold. For example, standards related to operating expense measures represent maximum thresholds not to be exceeded, while standards related to productivity measures represent minimum thresholds to be exceeded and standards related to service changes relate to whether or not the 5% threshold is exceeded.

A potential adverse effect is a geographical or time-based addition or reduction in service that includes but is not limited to: changes to span of service, changes to frequency of service, or elimination of routes or route segments.

A disparate impact occurs when the minority percentage of the population adversely affected by a major service change is greater than the average minority percentage of the population of RTS' service area.

A disproportionate burden occurs when the low-income percentage of the population adversely affected by a major service change is greater than the average low-income percentage of the population of RTS' service area. RTS completed a major service change during this reporting period (see Appendix K)

### ***Effectiveness and Efficiency***

In transit terminology, effectiveness refers to comparisons of passenger travel to another service attribute while efficiency refers to comparisons of time and money or distance and money.<sup>11</sup> Effectiveness and efficiency measures generally result from comparing:

- Service provided (hours or miles)
- Travel consumed (trips or passengers)
- Cost incurred (dollars and cents)

These comparisons lead to three subcategories: service effectiveness, cost effectiveness, cost efficiency.

Service effectiveness: Service effectiveness typically measures the travel obtained per unit of service. Example measures include passenger trips per revenue mile and passenger trips per revenue hour.

Passenger Trips per Vehicle Revenue Hour: Passenger Trips per Vehicle Revenue Hour measures ridership as a function of the amount of service provided by RTS.

$$\text{passenger trips per vehicle revenue hour} = \frac{\text{annual passenger trips}}{\text{annual revenue hours}}$$

Agencies heavily rely on this measure since service hours are a primary determinant of cost and passenger trips are a primary determinant of fare revenue. RTS' service standard for this measure is 19 passenger trips per revenue hour per route.

### ***Revenue Miles between Vehicle Failures***

Interruptions in service prevent full capitalization of ridership demand. *Revenue Miles between Vehicle Failures* provides an indication of how often delays and disruptions occur and in turn an agency's ability to adhere to its schedule. Both major and minor mechanical problems are included and failures are still counted even if a bus is able to complete its trip when the problem arises. RTS's service standard for this measure is at the system level and set at 8,595 miles.

<sup>12</sup> Data for all measures comes from Automatic Vehicle Location (AVL), Automatic Passenger Counters (APC), GIS, or farebox software.

### ***Passenger Miles per Seat Miles***

*Passenger Miles per Seat Miles* indirectly calculates the degree to which the supplied service matches demand.

$$\text{passenger miles per seat miles} = \frac{\text{average trip length} * \text{total passengers}}{\text{bus capacity} * \text{revenue miles}}$$

Historically, RTS's average trip length has been short, especially for UF-based routes. This measure, however, serves to balance longer, moderately productive RTS routes against those short, highly productive campus-bound routes. RTS's service standard for this measure is 25% per route.

### ***Cost Effectiveness***

Cost effectiveness measures the cost incurred per unit of travel or units of travel per cost. Routes with the greatest cost effectiveness give the most value for the amount of money spent.

### ***Operating Expense per Passenger Trip***

*Operating Expense per Passenger Trip* indicates how much it costs an agency to move each passenger.

$$\text{operating expense per passenger trip} = \frac{\text{annual route operating expense}}{\text{annual route ridership}}$$

As ridership grows this figure typically falls unless additional drivers are needed and is therefore reflective of local transit demand and the efficiency with which it can be met. RTS's service standard for this measure is at the route level and set at \$4.54.

### ***Farebox Recovery Ratio***

Transit services exist to a large degree to provide mobility for individuals experiencing financial or personal hardship. Consequently, transit services often receive state and federal grants so base fares can remain low and affordable. Most agencies offer discounted fares for children, the elderly, the disabled, and the impoverished. *Farebox Recovery Ratio* balances these efforts by setting a revenue goal for passengers to cover a certain percentage of service costs.

$$\text{farebox recovery ratio} = \frac{\text{fare revenues}}{\text{operating expenses}}$$

Fare revenues do include UF or Santa Fe College (SFC) service agreement funding.<sup>12</sup> A route with operating expenses of \$100,000 and fare revenue of \$25,000 has a farebox recovery ratio of 25% and is less cost effective than a route with a farebox recovery ratio of 50%. RTS's service standard for this measure is set system-wide at 18%.

### ***Subsidy per Passenger Trip***

A variation on the above measure, *Subsidy per Passenger Trip* measures the price of providing service to individual passengers beyond fare revenue.

$$\text{subsidy per passenger trip} = \frac{\text{operating expense} - \text{farebox revenue}}{\text{passenger trips}}$$

The interaction between subsidy per passenger trip and farebox recovery highlights changes in ridership and the extent to which those riders are paying full fare. It also helps indicate the extent of subsidization for each route. RTS's service standard for this measure is set system-wide at \$4.40 per passenger.

<sup>12</sup> There are limitations in both including and not include service agreement funding. Including it fails to capture instances where UF students utilize non-UF-funded routes, but not including it is misleading where UF students occupy the majority of route ridership and there is no expectation they will pay an out-of-pocket fare. In its absence, the local subsidy will appear much larger than what it actually is, since the student fee is supposed to estimate the revenue that RTS would earn if students had to pay out of pocket. The revenue RTS collects from its Employee Pass Program is not included in fare revenue since it cannot be allocated to specific routes. RTS will primarily evaluate fare structure changes based on those routes not subsidized by UF and SFC.

### ***Cost Efficiency***

Cost efficiency measures consider cost incurred per unit of service and provide an indication of how expensive it is to operate. By looking at the cost structure of existing routes, RTS can explicate the influence of factors like deadhead and vehicle speed, and in turn make better predictions regarding the cost of adding new service or changing existing services. The more efficient an agency becomes at providing outputs of service, the lower cost efficiency measures become. These measures, however, provide no indication as to the degree of service consumption.

### ***Operating Expense per Revenue Mile and Operating Expense per Revenue Hour***

Both *Operating Expense per Revenue Mile* and *Operating Expense per Revenue Hour* indicate the efficiency with which service can be provided. The primary difference between the two measures is that the latter removes vehicle speeds from the equation. RTS's service standards for these measures are at the system level and set at \$4.80 for Operating Expense per Revenue Mile and \$75.26 for Operating Expense per Revenue Hour.

### ***Passenger Trips per Employee Full-time Equivalent (FTEs)***

Passenger Trips per Employee FTE highlights an agency's ability to function lean and extract maximum productivity from their labor force. RTS's service standard for this measure is system-wide at 25,597.

### ***Safety and Customer Satisfaction***

All agencies strive to minimize accidents and customer service complaints, especially in this digital age where information spreads rapidly and persists. These measures reflect investments in training, vehicle and amenity conditions, and sound operations. They are a top priority across all facets of an agency.

### ***Preventable Accidents per 100,000 Miles***

Preventable Accidents are those where RTS is identified as the responsible party. Accidents are not only problematic for the potential harm they cause to passengers but also because of the impact they have on maintenance costs, the ability to meet peak level service, and increase in lawsuits and insurance rates. RTS's service standard for this measure is system-wide at 1.5 preventable accidents per 100,000 miles.

### ***Customer Service Complaints per 100,000 Trips***

Customer complaints can be minor, like an outdated webpage, or serious and require immediate action, like a discrimination complaint. Classifying customer interaction, though, as a complaint can be ambiguous and requires some discretion by the customer service representative. Consider for example, the following comments:

- Customer #1: "Please add more service to the route 12."
- Customer #2: "The route 12 runs so infrequently I can never get to class on time. This is ridiculous and inefficient."

In both scenarios, the patrons want more service on the route 12 but while customer #1 phrased their sentiments as a suggestion, customer #2 spoke much more critically. RTS stores customer suggestions and complaints in a database to better track trends.<sup>13</sup> RTS's service standard for this measure is system-wide at 15 complaints per 100,000 trips. There is also an expectation that all customer comments will be given a response within two working days of being received.

### ***Service Delivery***

Service delivery measures generally involve those factors that revolve around the customer experience and directly influence whether non-captive riders will utilize the transit system.

### ***On-Time Performance***

Beyond safety, no other factor has a bigger influence on ridership than on time performance. As routes fall off schedule, passenger loads shift and vehicles bunch forcing customers to seek out other modes of travel to combat transit travel discomfort and apparent capriciousness. On-time performance compares scheduled arrival and departure

<sup>13</sup> RTS currently tracks customer suggestions and complaints in in a single location using TrackIt. Complaints are often related to maintenance or planning related, which is itself often a judgment call.

times against actual arrival and departure times at all specified time points. The measure may bifurcate further by time of day, day of week, and block (as surrogate for personnel) and reflect needed adjustments related to traffic conditions, passenger loads, and layover requirements.<sup>14</sup>

On-time performance standards consist of the margin of lateness and earliness for which a vehicle can still be classified as on-time and the overall desired performance of each route. For RTS, a vehicle is considered on time if it departs a scheduled time point no more than 1 minute early and no more than 5 minutes late.<sup>15</sup> Table 1 specifies on-time performance standards.<sup>16</sup> RTS will pay particular attention to on-time performance for low frequency routes since the penalty to the patron is so much greater.

**Table 1. On-Time Performance Standards**

Time Period	Frequency ( $\leq 30$ minutes)	Frequency ( $> 30$ minutes)
Peak Hours	70%	75%
Off-Peak Hours	80%	80%
Weekend	80%	80%

### ***Vehicle Assignment***

Vehicle assignment refers to the process by which vehicles are placed on routes throughout the transit system. Vehicle assignment standards relate to vehicle age, which serves as proxy for condition and comfort. RTS uses a 12 year lifespan for all standard 40-foot buses and seeks to implement this standard within existing financial constraints to combat fuel economy and maintenance issues associated with older vehicles.

RTS provides Automatic Vehicle Location (AVL) services to its patrons. RTS operates 86 vehicles in peak service during the primary UF semesters and in turn has equipped 140 buses with AVL equipment. Moreover, RTS utilizes APC to collect passenger information. APC equipment is installed on all RTS service buses. As a result, these vehicles may be rotated system-wide on a weekly basis to ensure adequate sampling. RTS’ service standard for this measure is at the system level and stated as “Vehicles will be assigned to routes such that the average age of the fleet serving each route does not exceed 12 years and no route or set of routes will routinely have the vehicles towards the end of their useful life.”

### ***Service Availability***

Service availability looks at the distribution of service within the RTS service area both spatially and temporally.

### ***Temporal Availability***

Service span refers to the hours of the day and days of the week when service is available. A route’s hours of availability reflect the area it transverses and historic ridership trends and influences the types of trips it makes possible. RTS’s service standard for service span (Table 2) is at the system level: “Provide transit service on City/County routes for a minimum of 14 hours per weekday, 12 hours per Saturday, and 8 hours per Sunday on 80% of all fixed routes running on those days.”

<sup>14</sup> RTS will utilize APC for all measures related to on-time performance. Though APC units are not installed on the entire RTS fleet, the sampling methodology developed by RTS allows for full system coverage.

<sup>15</sup> “On-time” relates directly to an agency’s definition of early and late. The wider the margin, the more leniency an agency is providing itself. Early departures are viewed as more problematic than late arrivals since individuals are required to wait the entire length of the scheduled frequency for the next bus.

<sup>16</sup> When calculating on-time performance as part of the route performance value, RTS will look at overall on-time performance across these periods.

**Table 2. Desired Minimum Service Span**

Route Type	Weekday	Saturday	Sunday
UF Campus Connector	7:00 AM to 7:00 PM	11:00 AM to 7:00 PM	11:00 AM to 7:00 PM
City/County Routes	5:45 AM to 11:30 PM	6:45 AM to 9:30 PM	8:47 AM to 6:01 PM

***Spatial Availability***

Areas within ¼ to ½ mile of a transit stop are considered to have transit access. RTS’s service standard for spatial availability is at the system level and stated as “80% of the Census Block Groups with their geographic center completely within the RTS service area will be considered served if the geographic center of the Block Group is within ½ mile of a transit stop.”<sup>17</sup>

***Service frequency***

Service frequency measures the amount of time between two transit vehicles passing the same point in the same direction on the same route. As frequencies increase, so do costs. Thus, frequencies should be based on existing or potential demand.<sup>18</sup> Nonetheless, below a certain level (typically >60 minutes), passengers cannot reach their destination in a meaningful period of time. Table 3 sets the system-wide service frequency standards RTS will seek to achieve; these are set regardless of demand in order to provide attractive service level. Individual route frequency will derive from the productivity measures outlined above; all minimum peak frequencies are subject to funding but will never be diminished to more than 75 minutes.

**Table 3. Desired Minimum Frequency**

Route Type	Peak <sup>19</sup>	Off-Peak	Saturday	Sunday
UF Campus Routes	20 minutes	45 minutes	45 minutes	60 minutes
City/County Routes	20 minutes	45 minutes	45 minutes	60 minutes

When possible, RTS will utilize clock headways (frequency intervals of 15, 20, 30, 40 or 60 minutes) since they are easier for passengers to remember and facilitate better transfer connections between routes. This will be less true for SFC and UF routes where headways are timed to coincide with class schedules.

***Vehicle Load***

*Vehicle Load* serves as a measure of passenger comfort and service availability and is expressed as the ratio of passengers to the number of seats on a vehicle. Therefore, a load factor of 1.0 or 100% for a 40 seat vehicle means that all seats are occupied. When load factors exceed these values, passengers are forced to stand. This is uncomfortable and inconvenient for extended durations, and it also slows boarding and alighting, Table 4.

17 RTS acknowledges that geographic proximity and access to transit are not synonymous due to access barriers like walls, train tracks, and the absence of sidewalks. However, RTS lacks access to more sophisticated network analysis tools to develop a more refined measure.

18 City of Gainesville Transportation Mobility Element policy states that City shall strive to provide peak hour frequencies of 20 minutes or less within ¼ mile of all high density residential and UMU-1 (Urban Mixed Use) and UMU-2 land uses areas in city limits. Areas zoned as High Density Residential, Activity Center, or Urban Mixed Use have the greatest concentrations of employment and housing and thus the greatest propensity to use transit.

19 Peak service is defined as Monday thru Friday between 8:00 AM and 10:30 AM and 4:00PM and 6:30 PM.

**Table 4. Vehicle Load Maximum Standards**

Vehicle Type	Seats	Maximum Peak Loading Standard <sup>20</sup>	% of Max. Capacity to Seats on Vehicle in Peak	Maximum Off-Peak Loading Standard	% of Max. Capacity to Seats on Vehicle in Off-Peak
40-foot standard bus	40	50	125%	45	112%

### ***Bus Stops***

Bus stops serve as the gateway for accessing RTS services and have a direct influence on transit desirability. All stops are cleaned on a rotating basis as outlined in RTS bus stop maintenance plan, including route and stop identification information.

### ***Bus Stop Amenities***

Bus stop amenities ensure safety, accessibility, and comfort at RTS stops. RTS uses ridership levels to ensure equitable distribution of amenity provision rather than just focusing on select corridors or sections of the RTS service area.<sup>21</sup> Table 5 shows the thresholds RTS uses when allocating amenities.

**Table 5. Bus Stop Amenity Thresholds**

Stop Type	Daily Passengers	Amenities
I	<15	Stop Sign And Landing Pad
II	≥15 and ≤80	Shelter Types I, II, And III
III	>80	Bus Bay And Shelter

Apart from amenities in the field, RTS will strive to provide in-bus amenities or other services to aid in passenger safety, expediency, and system use. This includes: real-time bus location information; print and electronic service media regarding schedules, route maps, and transfers; audible stop announcements; and trip planning software

### ***Bus Stop Placement***

Bus stop spacing is based on several factors, including customer convenience, ridership demand, and vehicle speed. Closely spaced stops reduce walking distance but slow buses down, while stops spaced further apart increase walking distance but speed buses up. RTS’s service standard for this measure is system-wide at six to eight stops per mile or every 660 to 880 feet. This interval will fluctuate depending on the presence or absence of trip generators and safety and accessibility concerns.<sup>22</sup> Bus stops with <5 daily passengers over a year long period will be reviewed for elimination.

### ***Route Design***

RTS considers route design factors when developing or modifying routes. When doing this, it is vital to acknowledge that transit achieves the most success where certain urban form characteristics and route patterns exist.

### ***Sidewalk characteristics***

Limitations in street network connectivity, poor pedestrian access and mobility, physical barriers, and other conditions make accessing transit unsafe or unfeasible for prospective riders. RTS’s service standard for this measure is system-

20 A value of 50 with a seating capacity of 40 assumes that 40 individuals are seated and 10 are standing.

21 Most local funding for stop improvements comes from developer fees. These funds must be expended within ¼ to ½ mile from where they were collected. Since state and federal grants typically require a local match, their expenditures are often tied together. Since fiscal year 2014, RTS is coordinating with City and County Public Works to give them lists of the most active stops that lack sidewalk connections, lighting, and street crossing signage to take advantage of any funding they may have for stop improvements.

22 All stops to the greatest extent possible should follow Crime Prevention through Environmental Design (CPTED) policies regarding landscaping and lighting to allow for safety from injury and crime. This includes removing landscaping that hinders vision of a stop from a driver’s perspective and relocating stops to allow drivers to easily see waiting passengers when approaching a bus stop. All stops must also be accessible to any persons waiting to use transit, including disabled riders.

wide: “Sidewalks will accompany all routes for at least 50% of their length.”

### ***Demographic and Social Characteristics***

RTS riders who lack access to a personal automobile rely on transit as their lifeline to employment, educational opportunities, medical facilities, shopping, and other necessary services. RTS will provide services within ¼ mile of the block groups within its service area that have a value for the below variables that is higher than the RTS service area average:

- Zero-vehicle households (>8.04%)<sup>23</sup>
- ≥ 65 years old (>12.81%)<sup>24</sup>
- Below Poverty (>35.15%)<sup>25</sup>

### ***Route Directness***

RTS routes are designed to operate as directly as possible in order to minimize travel time, eliminate transfers, and compete with standard automobile speeds. To do this, RTS buses often operate on arterial and collector roads, minimizing turning movements and operation on local roads. RTS’s service standard for this measure is system-wide: “The distance between a route’s origin and destination should not exceed 175% of the shortest possible driving distance between these two points by personal automobile.”<sup>26</sup>

Deviations from the basic alignment of a fixed route should only occur to serve major activity centers or to provide coverage to areas with limited access to transit, and they result in an increase in productivity. The additional time needed to deviate from the basic alignment should not exceed 5 minutes or 10% of the one-way travel time of the existing route without deviation and be of no greater distance than 1 mile. Branches or short-turns should be reviewed as possible alternatives where passenger load after a certain point is only a fraction of the maximum load.<sup>27</sup> Routes may include up to 2 branches but only 1 short-turn.

Route directness should also take into consideration route length. Longer routes are subject to more sources of delay and in turn have a greater difficulty staying on schedule.

### ***Travel Speed***

Slow travel speeds mean more time spent on unproductive activities and, in particular, can result in lost wages. Travel speed will compare system-wide average speeds against a weighted average (miles of roadway) of roadway speeds.<sup>28</sup> RTS’s service standard for this measure is system-wide and sets transit speeds at no less than 66% of the weighted average roadway speed.

### ***Route Spacing***

Route spacing indicates the extent of service duplication, unused capacity, and how well RTS distributes its services. While routes should intersect with other routes to allow transfers, parallel routes operating closely together have the potential to split service demand. RTS will calculate for each route, the miles it overlaps with all other individual

23 U.S. Census Bureau: Tenure by Vehicles Available.

24 U.S. Census Bureau: Sex by Age.

25 U.S. Census Bureau: Poverty Status in the Past 12 Months by Household Type by Age of Householder.

26 RTS will use widely available, internet-based trip planning algorithms to make these calculations. The measure will consider distance traveled from one bus endpoint to the other divided by the optimal driving distance between these two points as identified by the trip planning software.

27 A branch is one of two or more outer route segments served by a single route. Short turns are routes where some vehicles travel the entire length of the route while others turn around at a designated point along the route.

28 RTS recognizes the limits of this approach since it does not include walk time, wait time, or fully capture in-vehicle time. Future service standard versions may create a set of 5-10 origin/destination pairs identified through origination/destination surveys and compare auto versus transit travel times.

routes relative to its own total length and then consider the maximum of these numbers. No RTS route should overlap with any other single route for more than 33% of its length.<sup>29</sup>

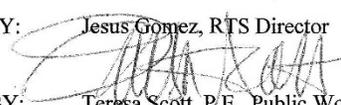
<sup>29</sup> Special conditions may exist that necessitate routes to operate within closer proximity than this guideline suggests.

**Appendix J: RTS Service/Fare Change Policy**

CITY OF GAINESVILLE  
PUBLIC WORKS OPERATIONS MANUAL

**CHAPTER 35 – Public Comment**

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DIVISION: Regional Transit System (RTS)  
SECTION:  
PROCEDURE #: 35.12  
SUBJECT: Public Comment  
EFFECTIVE DATE: 10/31/09 REVISED: 09/29/11, 11/18/13, 11/16/16  
PREPARED BY: Jesus Gomez, RTS Director  
APPROVED BY:  Teresa Scott, P.E., Public Works Director

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**POLICY:**

The City of Gainesville Regional Transit System (RTS) adopts and is in compliance with the policies set forth by the City of Gainesville, the Department of Transportation's (DOT) Title 49 Code of Federal Regulations (C.F.R.) Transportation (current as of November 16, 2016), the Federal Transit Administration (FTA), and the Florida Department of Transportation (FDOT). RTS shall post information, conduct public meetings, and hold public hearings to ensure that the public, and affected organizations, have an opportunity to comment on proposed transit service changes or fare changes.

**PRACTICE:**

All major service changes or fare changes shall be presented to the RTS Citizens Advisory Board (RTS CAB) for their review and recommendation to the City Commission. Based on feedback from the RTS CAB applicable changes are made and then presented at a public meeting for final review and feedback. Necessary modifications are made again to respond to public comment. . A major service change shall be defined as any change that exceeds 5% of the total revenue hours by route or total revenue miles by route. All fare changes are subject to City Commission approval.

All minor service changes shall be presented to the RTS CAB for their review and recommendation to the RTS Director prior to implementation. Minor service changes shall be defined as any change equal to or less than 5% of the total revenue hours by route or total revenue miles by route.

**GUIDELINES:**

RTS follows the public comment process for service and/or fare changes as shown below.

1. RTS proposes a service change and determines if the service change is a major or minor service change. Major service changes shall be presented to the RTS CAB and public at two public meetings. Minor service changes shall be presented to the RTS CAB only. All fare changes shall be presented to the RTS CAB at a public meeting and to the City Commission for approval at a public hearing.
  - a. For Major Service Changes, a noticed public meeting shall be provided in a newspaper of general circulation for the RTS service area, at least two (2) weeks prior to the advertised public meeting. Such advertisement shall include information such as the meeting date,

CITY OF GAINESVILLE  
PUBLIC WORKS OPERATIONS MANUAL

time, location, brief description of the proposed changes and special accommodations and/or transportation that may be available to attend the public meeting.

- b. After presenting the proposed service changes at the RTS CAB and general public meetings, RTS staff will notify the City Commission of any RTS CAB concerns or opposition and respond appropriately.

*Appendix K: Service Equity Analysis*

July  
2025

# Title VI Equity Analysis: Fall 2025 Service Change

CITY OF GAINESVILLE REGIONAL  
TRANSIT SYSTEM (RTS)

DEPARTMENT OF TRANSPORTATION

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## I. Introduction

According to the Federal Transit Administration (FTA) Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, transit providers that operate 50 or more fixed route vehicles in peak service and are located in urbanized areas (UZA) of 200,000 or more people must conduct a Title VI equity analysis when they plan a fare change and/or a major service change. In 2024, the City of Gainesville's Regional Transit System (RTS) had 86 vehicles operating in maximum (VOM) service and served a UZA with a total population of 213,748 and, is therefore, required to perform an Equity Analysis for its proposed Fall 2025 service change. The following report fulfills that requirement.

## II. Proposed Changes

Gainesville Regional Transit System (RTS) annually undertakes three service changes – Fall, Spring and Summer. University of Florida (UF) and Santa Fe College (SF) students comprise about 80% of RTS transit riders; therefore, during the summer, while serving the entire community, RTS provides reduced (skeletal) services to meet the travel needs of the fewer students who are taking advantage of summer courses. Along those lines, RTS' fall and spring service levels regularly remain unchanged to sustain students' familiarity with agency services for the regular academic year. RTS is engaging in a service equity analysis to evaluate the impacts of service changes on transit users for Fall 2025, a LOS that will carry over to Spring 2026. The service change analysis compares Fall 2025 service levels with those offered in Fall 2024.

RTS operated 38 routes in Fall 2024 (see Figure 1). RTS is proposing a major service change that will be effective at the beginning (August 18) of the University of Florida's (UF) Fall Semester 2025. Part of the change includes the consolidation of the 100-series routes into the existing UF Campus Connector routing system, except that RTS will still retain Route 118 in its system. The university's TAPS (Transportation and Parking Services) department will, however, continue to provide transit services to the UF population that previously had access to those routes when they constituted parts of the RTS service structure. Routes 1, 3, 6, 7, 12, 13, 20, 23, 33, 75 and 711 will be modified.\* Moreover, there will be reductions in service frequency (from 2 to 1 bus) on routes 5, 8, 15 and 43. The service change will also include the reconfiguration of Routes 12, 34 and 35 into Route 12, Routes 16 and 17 into Route 17, and Routes 20 and 21 into Route 20. In total, 11 routes will be modified (see Figure 2), while four routes (16, 21, 34 and 35) will be eliminated. The result will be a system with 27 fixed routes (see Figure 3). A summary of the proposed changes is shown in Table 1.

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\*Route 711 is a combination of Routes 7 and 11 during evening service.

Figure 1: Fall 2024 Service Map

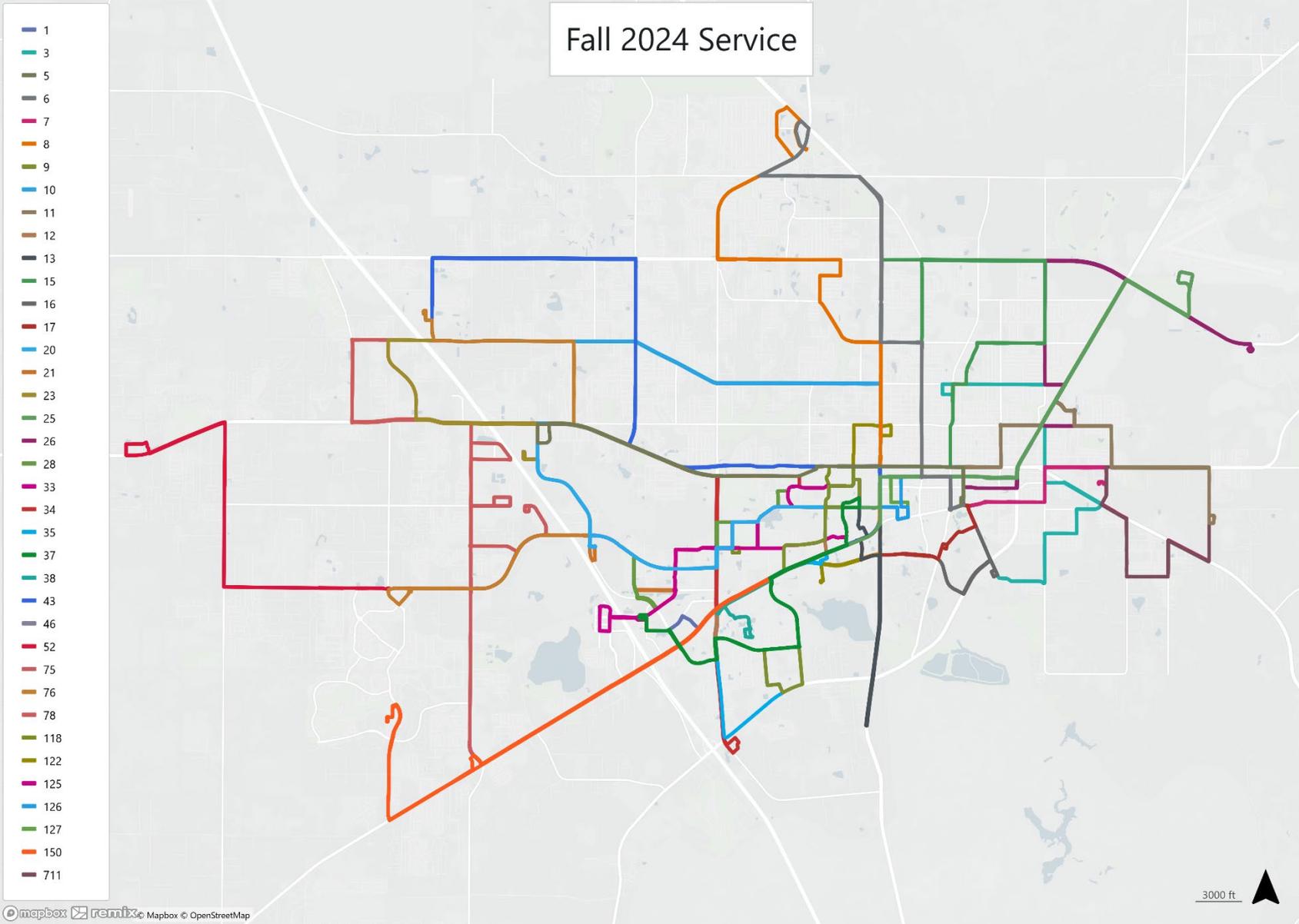


Figure 2: Modified Route Map

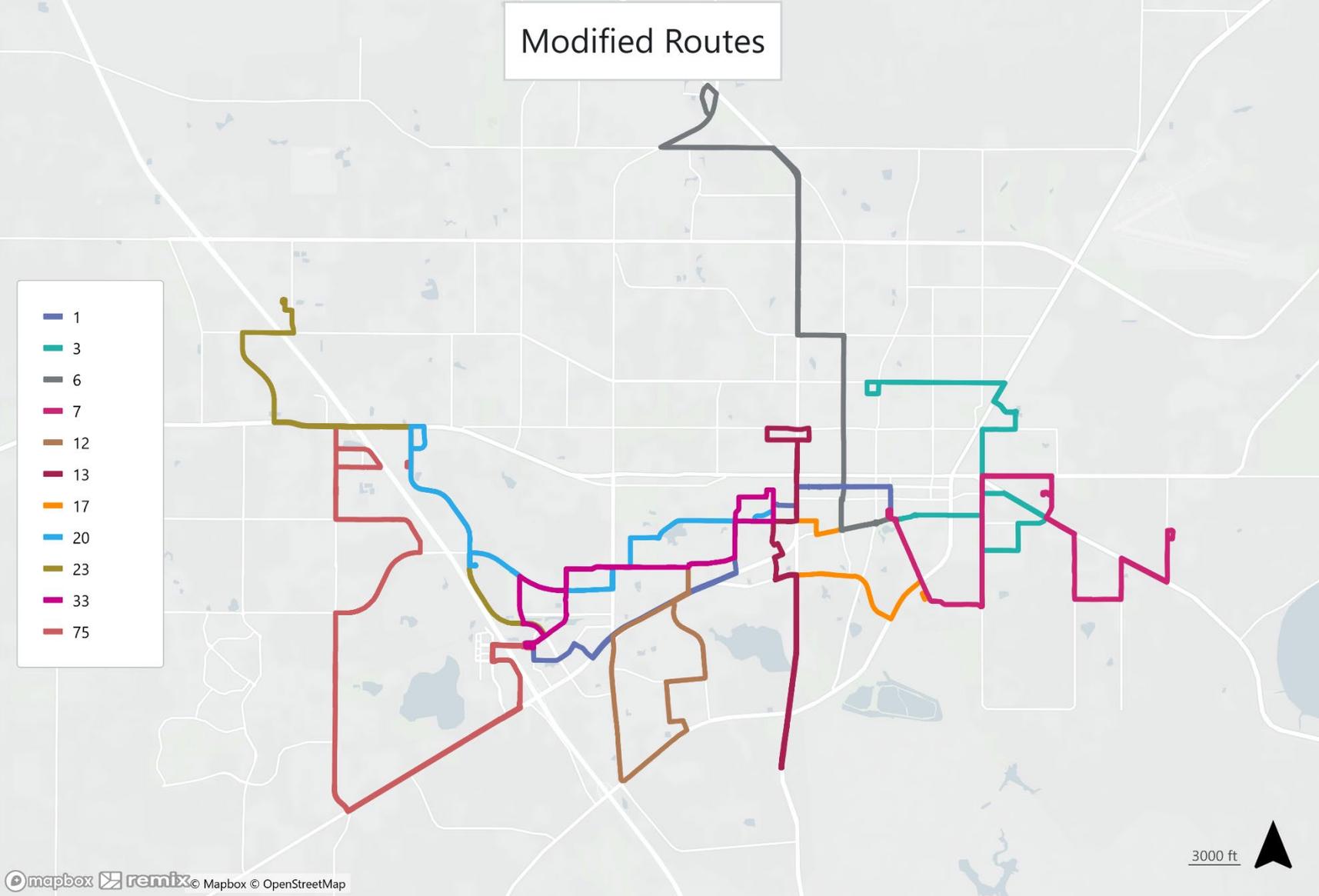


Figure 3: Proposed Service Map

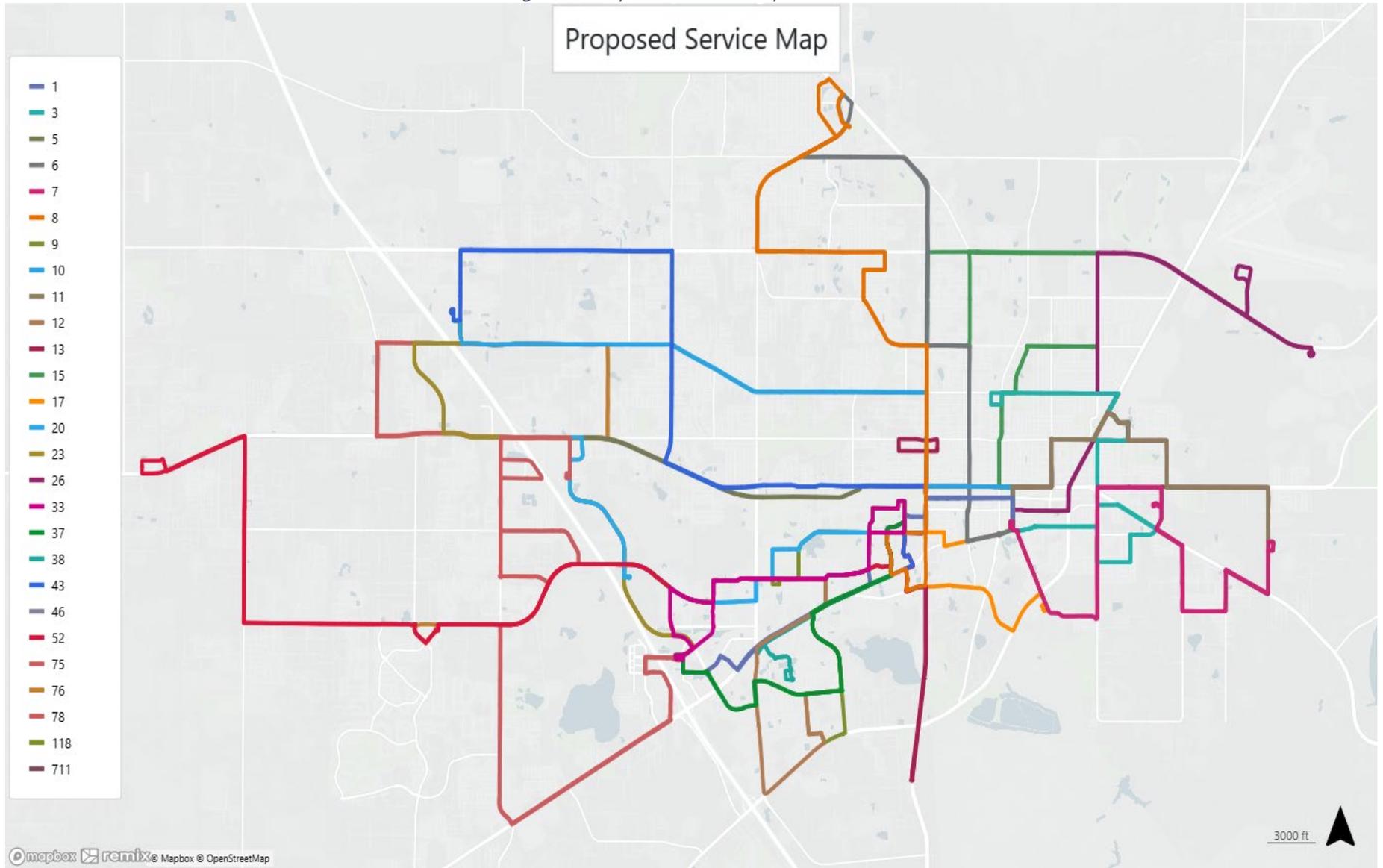


Table 1: Summary of Proposed Service Changes

Route #	Route Name	Modified Route	Eliminated Route
1	Downtown Station to Butler Plaza	X	
3	Downtown Station to N Main Post Office	X	
6	Downtown Station to N Walmart Supercenter	X	
7	Downtown Station to Eastwood Meadows	X	
12	Reitz Union to Butler Plaza Transfer Station	X	
13	Beaty Towers to Cottage Grove Apartments	X	
16	Beaty Towers to Downtown Station		X
17	Beaty Towers to Rosa Parks Downtown Station	X	
20	Reitz Union to Oaks Mall	X	
21	Reitz Union to Cabana Beach		X
23	Oaks Mall to Santa Fe College	X	
33	Butler Plaza Transfer Station to The Hub	X	
34	The Hub to VA Med Clinic		X
35	Reitz Union to SW 35 Place		X
75	Oaks Mall To Butler Plaza	X	
711	Downtown Station to Eastwood Meadows*		X
100-Series	UF Campus Routes (122,125,127,150)		X

\*This is a combination of existing routes during evening service

### III. Major Service Change Policy

The RTS Major Service Change Policy defines a major service change as a change in revenue miles or hours that is greater than or equal to five percent. RTS is proposing a reduction of weekday revenue hours from 1,025.3 hours (Fall 2024) to 714.5 hours (Fall 2025) effective August 18, 2025. This change will constitute a 310.80-hour reduction in total weekday revenue hours, or 30.31%, which qualifies as a Major Service Change.

#### A. Engagement Process

The RTS Service/Fare Change Policy states that all major service or fare changes shall be presented to the RTS' Citizens Advisory Board (CAB) for their review and recommendation to the City Commission. Based on the feedback from CAB, applicable changes are made and then presented at a public meeting for final review and feedback. Necessary modifications are made again to respond to public comments. The guidelines for the public comment process also state that major service changes must be presented at two public meetings in addition to the RTS' CAB Meeting. These public meetings are to be advertised in a newspaper of general circulation for the RTS service area at least two weeks before the meeting date and should include the meeting date, time, location, a brief description of the proposed changes, and special accommodations and/or

transportation that may be available to the public meeting. Those public meetings were held on April 4 and May 8, 2025 and CAB meetings were held on May 28 and July 23, 2025.

In addition, the FTA (Federal Transit Administration) requires that the transit provider's governing entity be briefed on the equity impacts. The approved Service or Fare Equity Analysis, including documentation, that supports the governing entity's consideration, awareness, and approval of the analysis, will be submitted with the next scheduled Title VI Program submission. RTS is expected to submit the next Title VI Program plan by September 30, 2025.

## IV. Adverse Effects

A potential adverse effect is a geographical or time-based addition or reduction in service that includes but is not limited to: changes to span of service, changes to frequency of service, or elimination of routes or route segments.

### A. Disparate Impact Policy

A disparate impact occurs when the minority percentage of the population adversely affected by a major service/fare change is greater than the average minority percentage of the population of RTS' affected service area.

### B. Disproportionate Burden Policy

A disproportionate burden occurs when the low-income percentage of the population adversely affected by a major service/fare change is greater than the average low-income percentage of the population of RTS' affected service area.

## V. Analysis Framework

Demographic data for this analysis is derived from the US Census Bureau's 2018-2022 American Community Survey (ACS) 5-Year Estimates. For this analysis, minorities are defined as people who are non-white or are of Hispanic or Latino origin. Low-income populations are defined as those who fall below the US federal poverty level, as set forth by the US Census Bureau.

In order to determine the share of minority and low-income populations within RTS service area, a 0.25 mile buffer was created around each RTS bus stop to represent the population within walking distance of the system. For each block group that has an overlap with this catchment area, the block group's statistics (minority and low-income percentages) were multiplied by the percentage of overlap to find the service area's overall minority and low-income percentages, and these come out as 45% and 30%, respectively. The same methodology was applied to determine the minority and low-income population percentages served by each individual route. This comparison population was selected because RTS does not currently collect demographic data from its riders.

## VI. Assessing Impacts

### A. Disparate Impact

After calculating the minority population served by each route modified or eliminated under the proposed service change, seven (Routes 3, 7, 23, 34, 35, 75, and 711) out of fifteen were found to have disparate impact, or a higher minority population than the RTS Service Area: Overall, the *average* minority population across all routes affected by the major service change is 48%. The minority population for each affected route is shown in Table 2. The *average* minority population for all modified routes is 59% (see Figure 4), while the average minority population for eliminated routes is 44% (see Figure 5).

*Table 2: Disparate Impact by Route*

<b>Percent (absolute) in Minority - affected Service Area Routes: 45%</b>			
Route #	Route Name	% Minority**	Disparate Impact**
1	Downtown Station to Butler Plaza	39%	NO
3	Downtown Station to N Main Post Office	66%	YES
6	Downtown Station to N Walmart Supercenter	42%	NO
7	Downtown Station to Eastwood Meadows	78%	YES
12	Reitz Union to Butler Plaza Transfer Station	44%	NO
13	Beaty Towers to Cottage Grove Apartments	39%	NO
16	Beaty Towers to Downtown Station	43%	NO
17	Beaty Towers to Rosa Parks Downtown Station	40%	NO
21	Reitz Union to Cabana Beach	40%	NO
23	Oaks Mall to Santa Fe College	52%	YES
33	Butler Plaza Transfer Station to The Hub	44%	NO
34	The Hub to VA Med Clinic	46%	YES
35	Reitz Union to SW 35 Place	50%	YES
75	Oaks Mall to Butler Plaza	60%	YES
711	Downtown Station To Eastwood Meadows	63%	YES
	<i>**These and similar subsequent data are generated by Remix planning software which is designed in part for this purpose.</i>		

Figure 4: Modified Routes and Minority Population Map

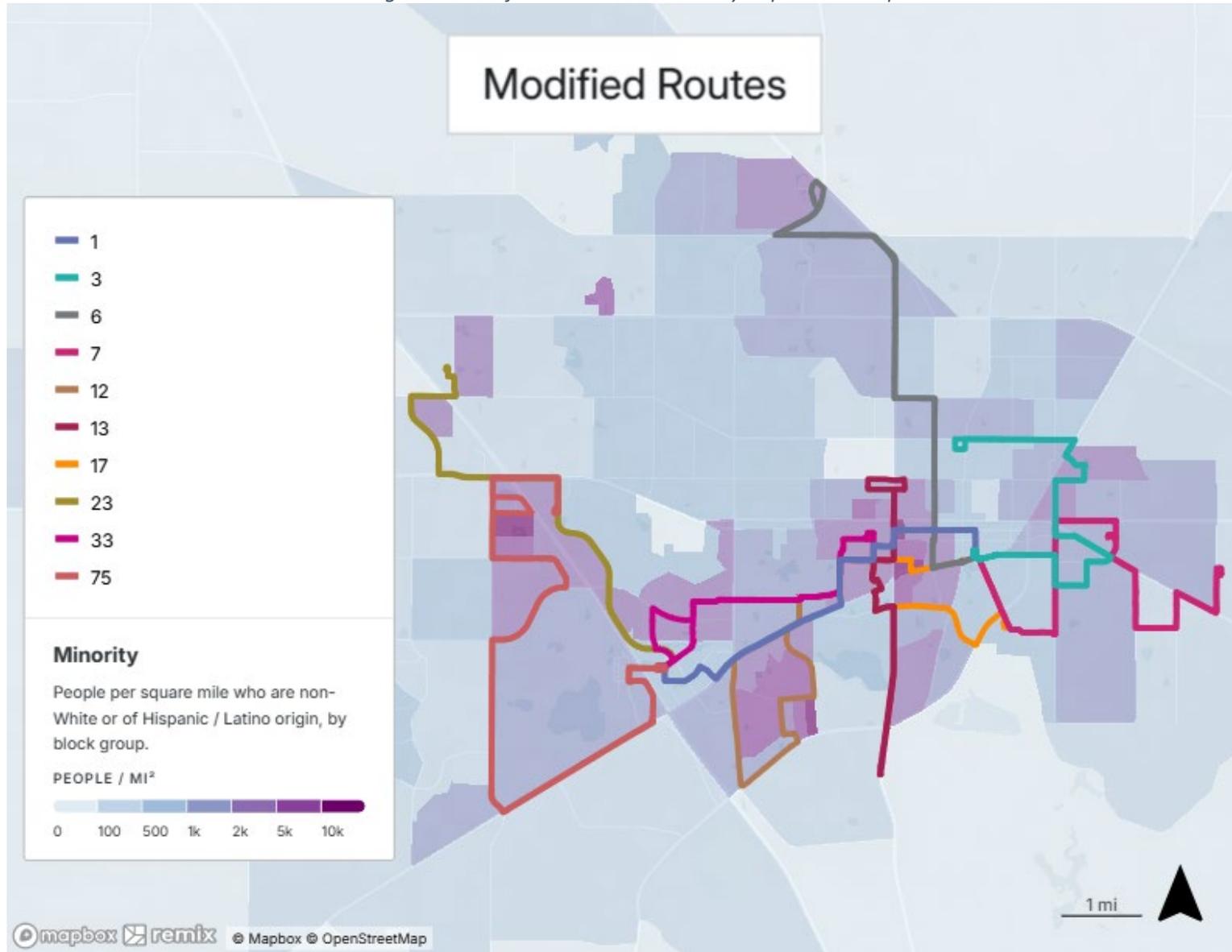
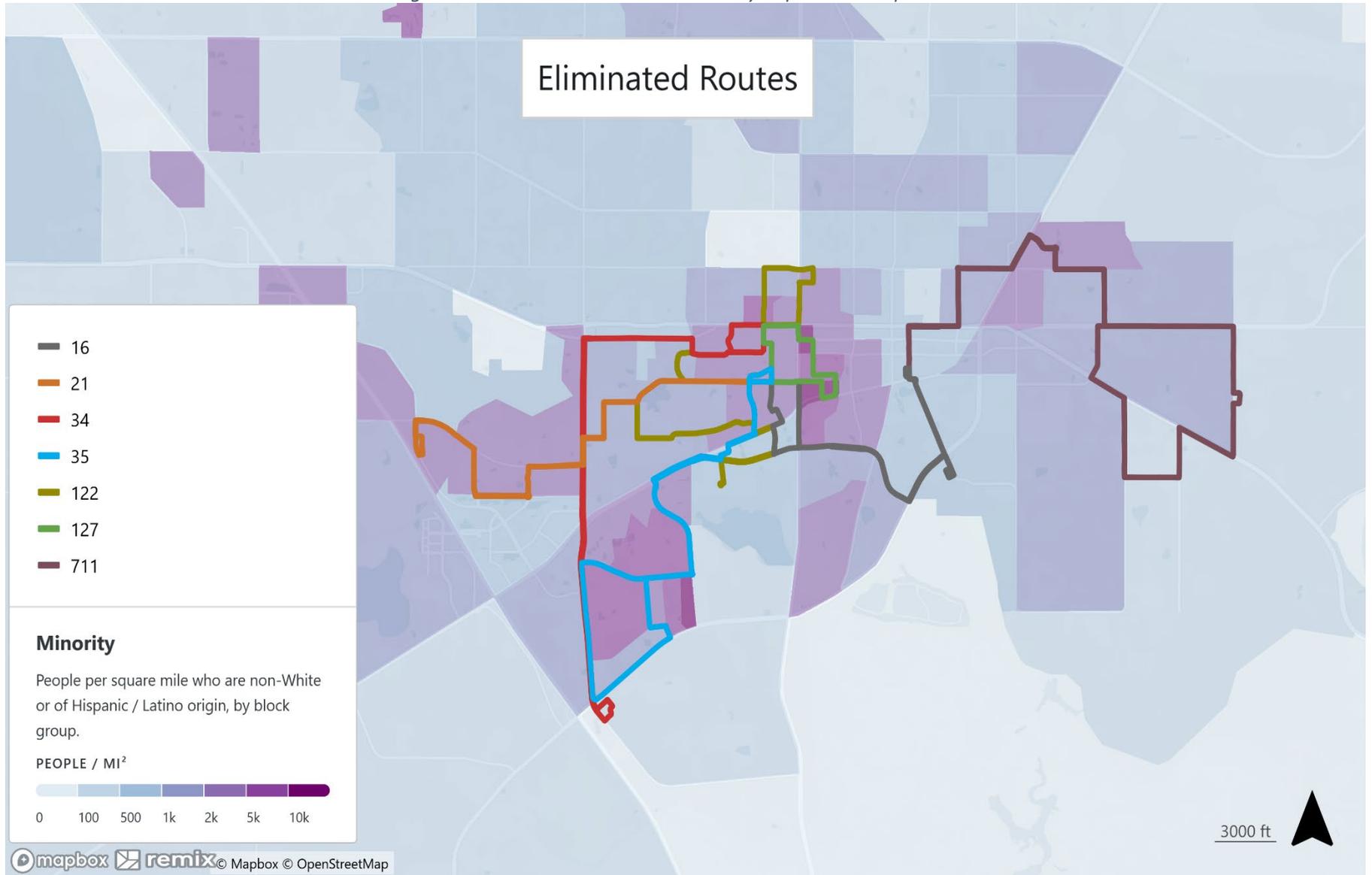


Figure 5: Eliminated Routes and Minority Population Map



## B. Disproportionate Burden

In contrast, after calculating the low-income population served by each route modified or eliminated under the proposed major service change, eleven out of fifteen routes were found to have a disproportionate burden (Table 3). Overall, the *average* low-income population across all routes affected by the major service change is 40%. The low-income population for each route is shown in Table 3. The low-income population for all modified routes is 36% (see Figure 6), while the minority population for eliminated routes is 46% (see Figure 7).

*Table 3: Disproportionate Burden by Route*

<b>Percent (absolute) of Poverty along affected RTS Service Routes : 30%</b>			
Route #	Route Name	% in Poverty	Disproportionate Burden
1	Downtown Station to Butler Plaza	49%	YES
3	Downtown Station to N Main Post Office	26%	NO
6	Downtown Station to N Walmart Supercenter	32%	YES
7	Downtown Station to Eastwood Meadows	30%	NO
12	Reitz Union to Butler Plaza Transfer Station	37%	YES
13	Beaty Towers to Cottage Grove Apartments	46%	YES
16	Beaty Towers to Downtown Station	49%	YES
17	Beaty Towers to Rosa Parks Downtown Station	52%	YES
21	Reitz Union to Cabana Beach	37%	YES
23	Oaks Mall to Santa Fe College	31%	YES
33	Butler Plaza Transfer Station to The Hub	33%	YES
34	The Hub to VA Med Clinic	41%	YES
35	Reitz Union to SW 35 Place	40%	YES
75	Oaks Mall to Butler Plaza	23%	NO
711	Downtown Station to Eastwood Meadows	24%	NO

Figure 6: Modified Routes and Low-Income Population Map

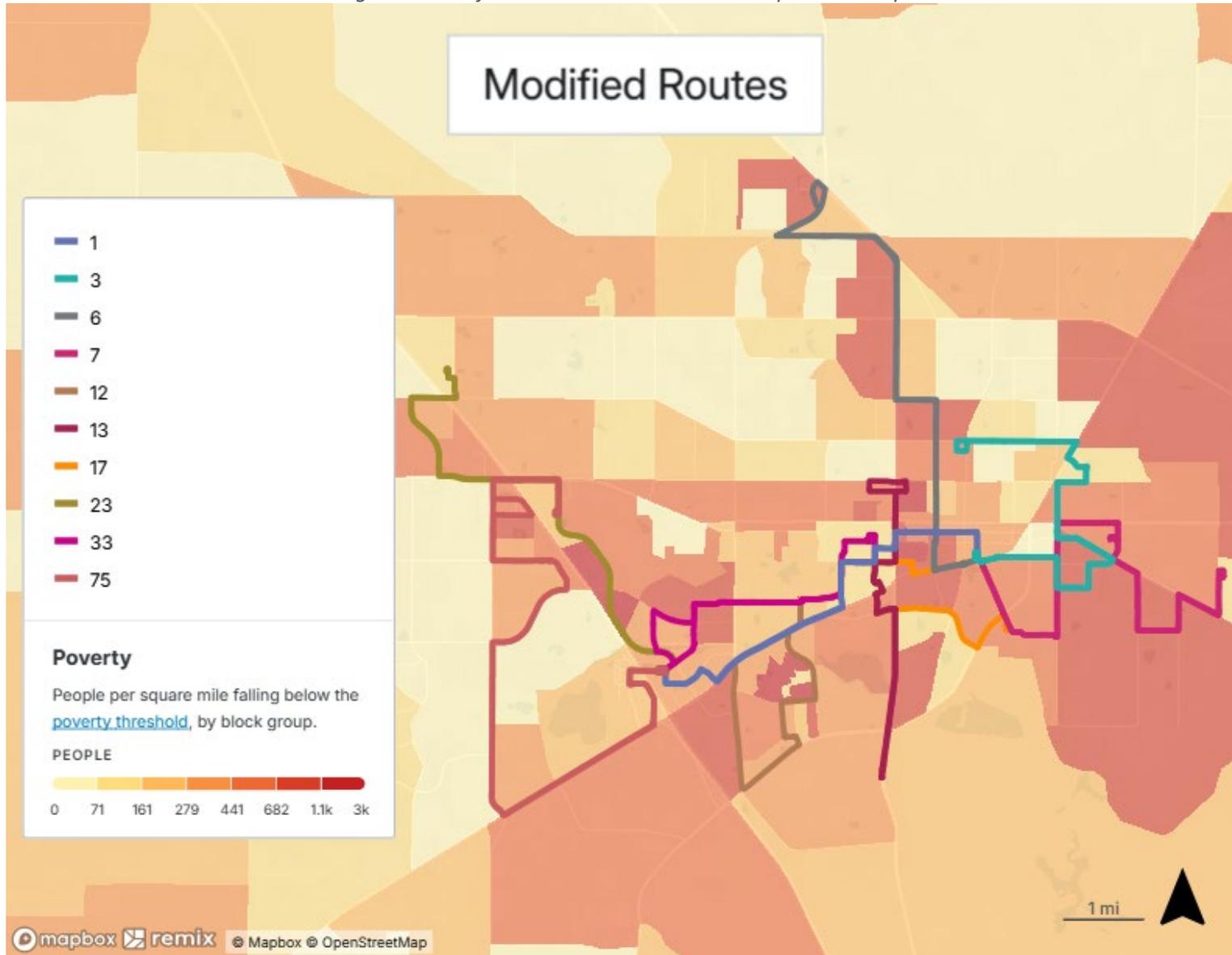
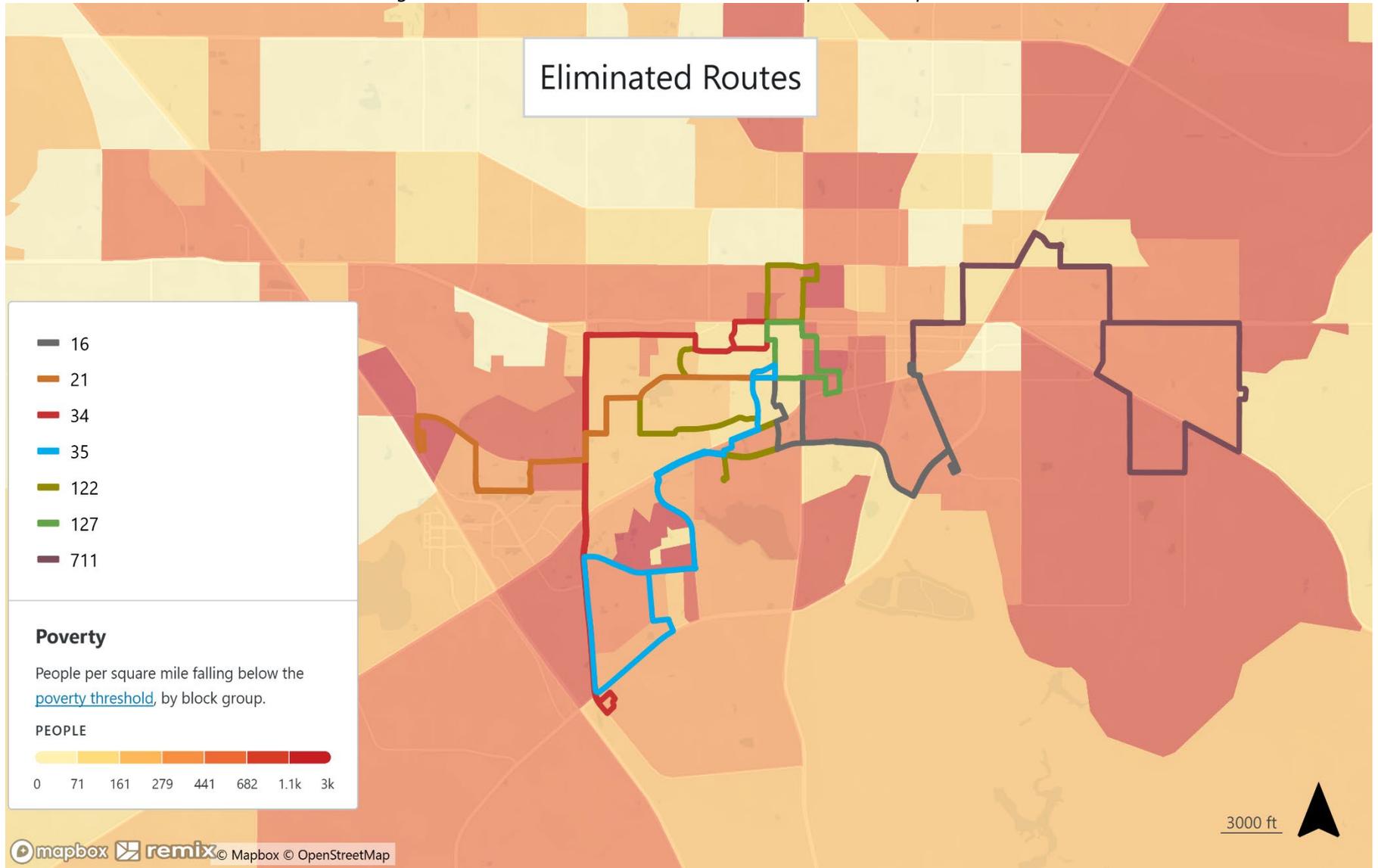


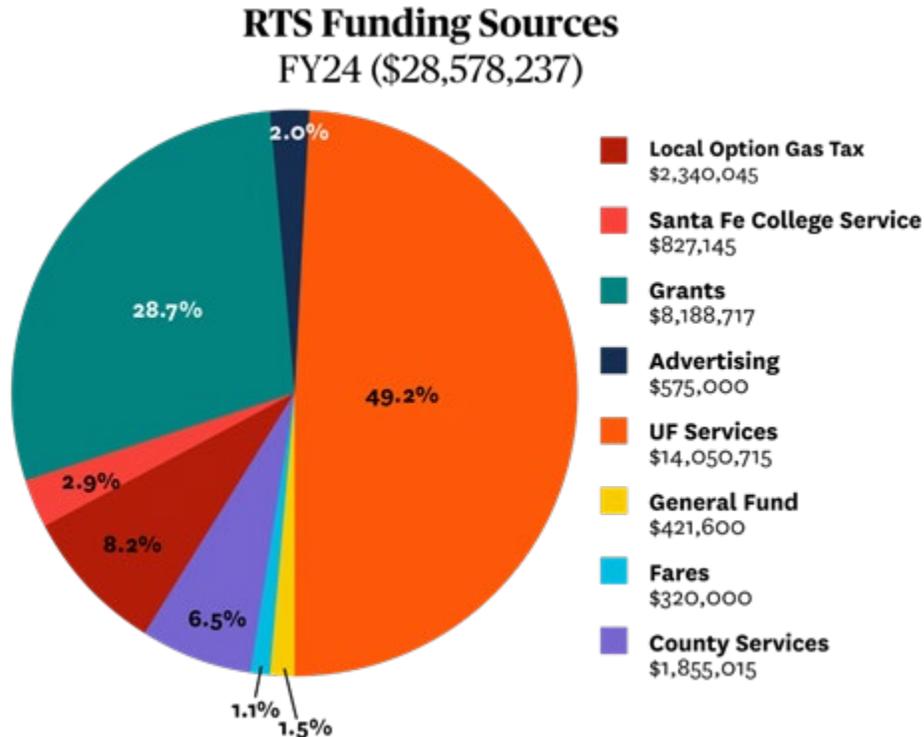
Figure 8: Eliminated Routes and Low-Income Population Map



## VII. Justification

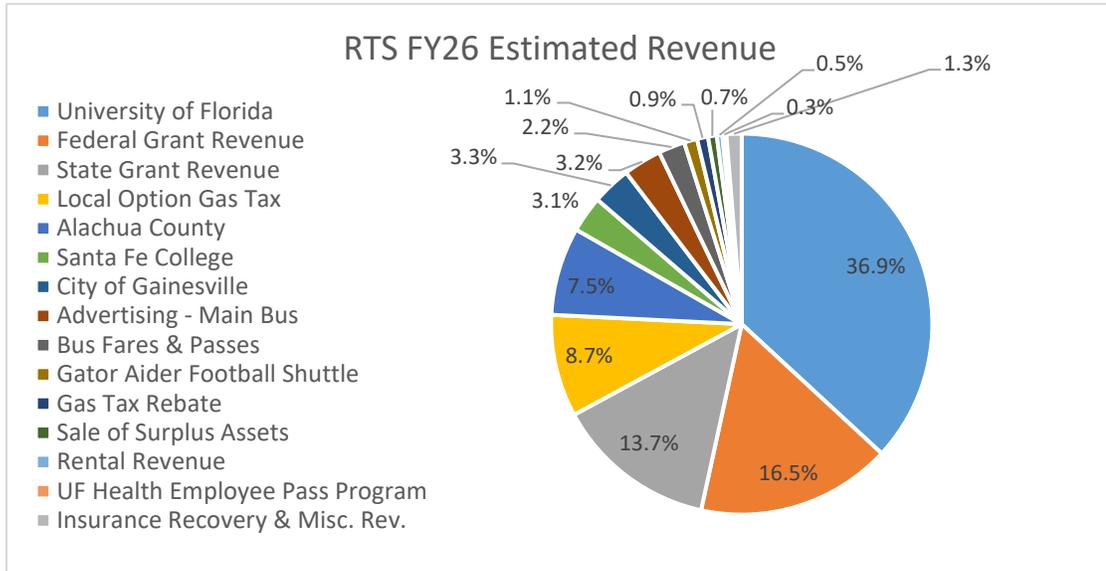
Despite finding disparate impact and/or disproportionate burden associated with all affected routes, RTS will implement the proposed major service change based on substantiated justification – funding shortages. In Fiscal Year 2024 (FY24), UF funding accounted for \$14,050,715, or 49.2% of RTS’ operating budget (see Figure 8). \$13,705,715 was derived from UF’s

Figure 8: RTS Funding Sources, FY 24



transportation bus fees, a tuition fee which the University charges its students in order to subsidize their free, unlimited use of RTS fixed-route service. Of the remaining \$345,000 UF contribution to RTS’ budget, \$270,000 came from UF’s fund for providing the Gator Aider Bus Service, a special service offered on UF Football home game days, and \$75,000 was contributed by Shands Health Employee Pass Program. When compared to estimated FY26 funding outlay, (Figure 9), UF will significantly reduce its financial contribution to RTS to 36.9% or \$9,940,858, and this funding level may carry over to subsequent semesters and service levels – and that constitutes the driving force behind the proposed major service reductions. The affected routes are either entirely or mostly funded through the University’s transportation fee, and will be modified or eliminated based on the university’s budget constraints. Presently, RTS has no alternatives or dedicated funds and/or funding source(s) to prevent the reduction in services. Any future funding challenges will impact RTS’ future levels of service, which will result in additional service cuts.

Figure 9: RTS Projected Funding FY 2026



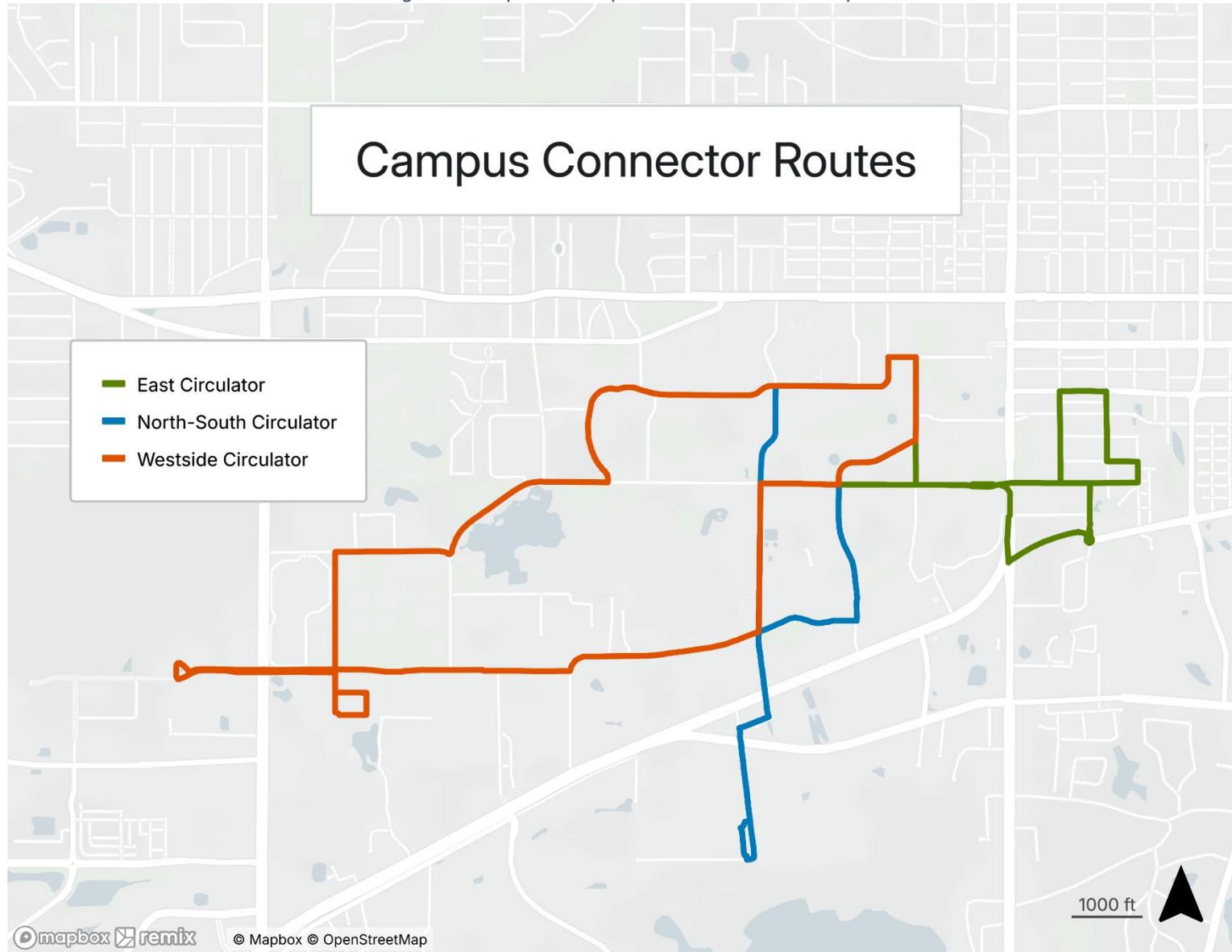
### VIII. Mitigating Impact

UF TAPS, as previously mentioned, will take over the operation of RTS' campus routes – 122, 125, 126, 127 and 150 (the 100-series) – even though these routes have some of the highest low-income populations; therefore, the services will still exist, but they will not be parts of the RTS network system. UF TAPS will continue to separately provide the service to UF students, faculty, and staff as a premium service, operating at a high frequency with 12-seater vans. Following the major service change, UF will turn these routes into three campus connector routing system (see Figure 9) that will operate at a longer span and, at a higher frequency. Monday through Friday, these routes will operate from 7 AM to 7 PM (compared to the previous 7:30-5:30 PM service structure) with 10 to 15 minute service intervals (compared to 25-60 minutes frequency in Fall 2024). UF TAPS will also add weekend service to the routes, which is not currently available. On Saturday and Sunday, they will operate from 11 AM to 7 PM. Overall, these changes are expected to yield to increases in total service hours due to increases in service span and frequency to be implemented by TAPS, Table 4.

Table 4: Campus Connector Routes: Span and Frequencies

	Monday - Friday		Saturday and Sunday	
	Span	Frequency	Span	Frequency
	7:00 AM - 7:00 PM	10-15 min	11 -7 PM	On-demand

Figure 9: Proposed Campus Connector Route Map



The proposed modifications will result in minimal changes to route alignments: modifications on route 1 will only change how the route accesses UF's Campus (see Figure 10); Route 3 will take over Route 7's former 7<sup>th</sup> Avenue section (see Figure 11), while Route 7 will take over Route 3's former SE 4<sup>th</sup> Street segment and 21<sup>st</sup> Avenue section (see Figure 12). Route 6 will travel up 6<sup>th</sup> Street after leaving Depot Avenue rather than taking Main Street (see Figure 13). Route 12 will absorb the former Route 34 and 35 services (see Figure 14) while Route 13 will remain practically unchanged except that it will travel further north to 8<sup>th</sup> Avenue (see Figure 15). Route 17 will change to absorb the former Route 16 service (see Figure 16) and Route 23 will be extended to Butler Plaza Transfer Station (see Figure 17). Route 33 will also be modified to end at the Butler Plaza Transfer Station rather than at Celebration Pointe (see Figure 18). Route 75 will travel along 61<sup>st</sup> Street between 8<sup>th</sup> Avenue and 24<sup>th</sup> Avenue rather than 75<sup>th</sup> Street (see Figure 19). Major impacts are observed in routes that will be absorbed through route combinations.

Figure 10: Route 1 Modifications

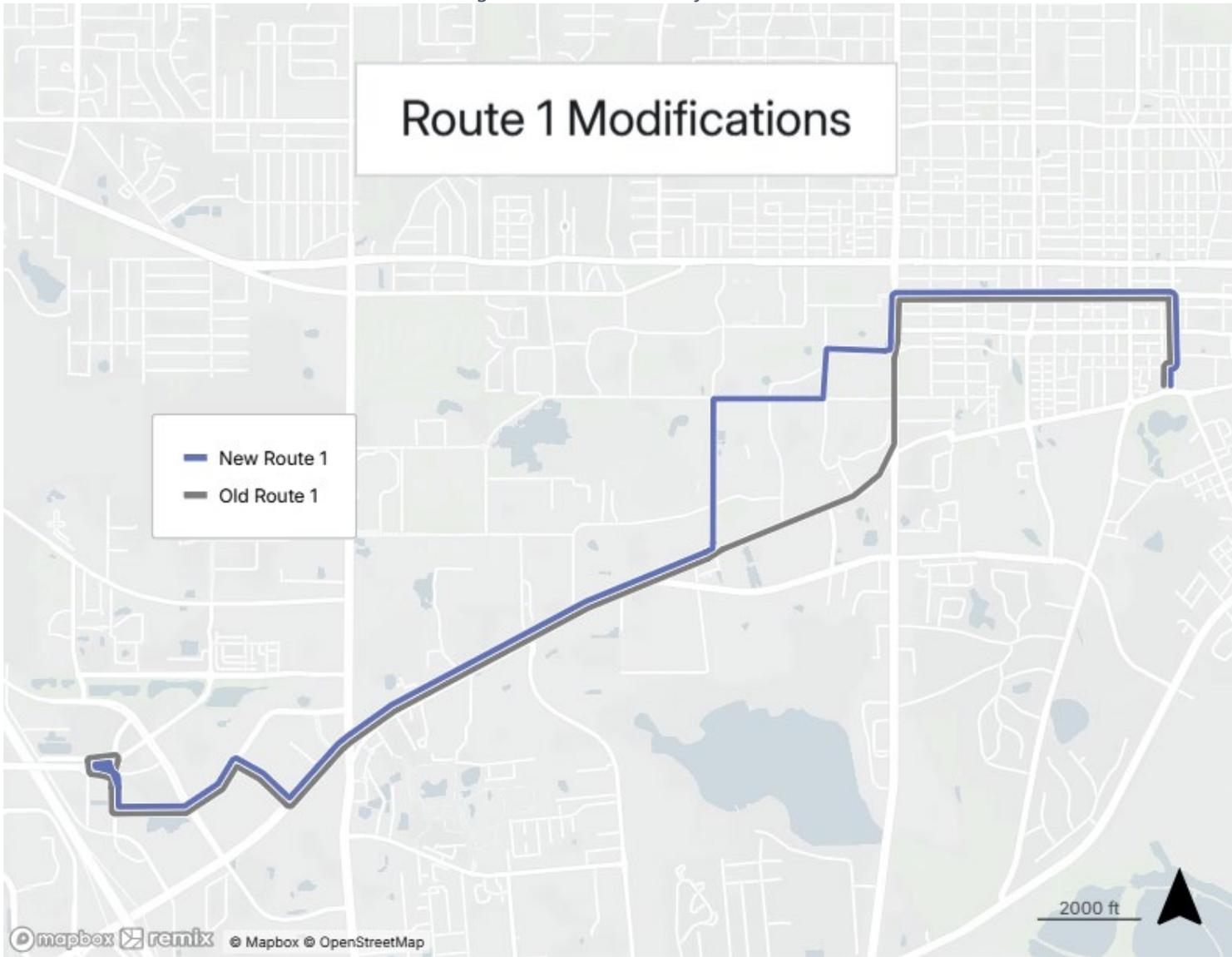


Figure 11: Route 3 Modifications

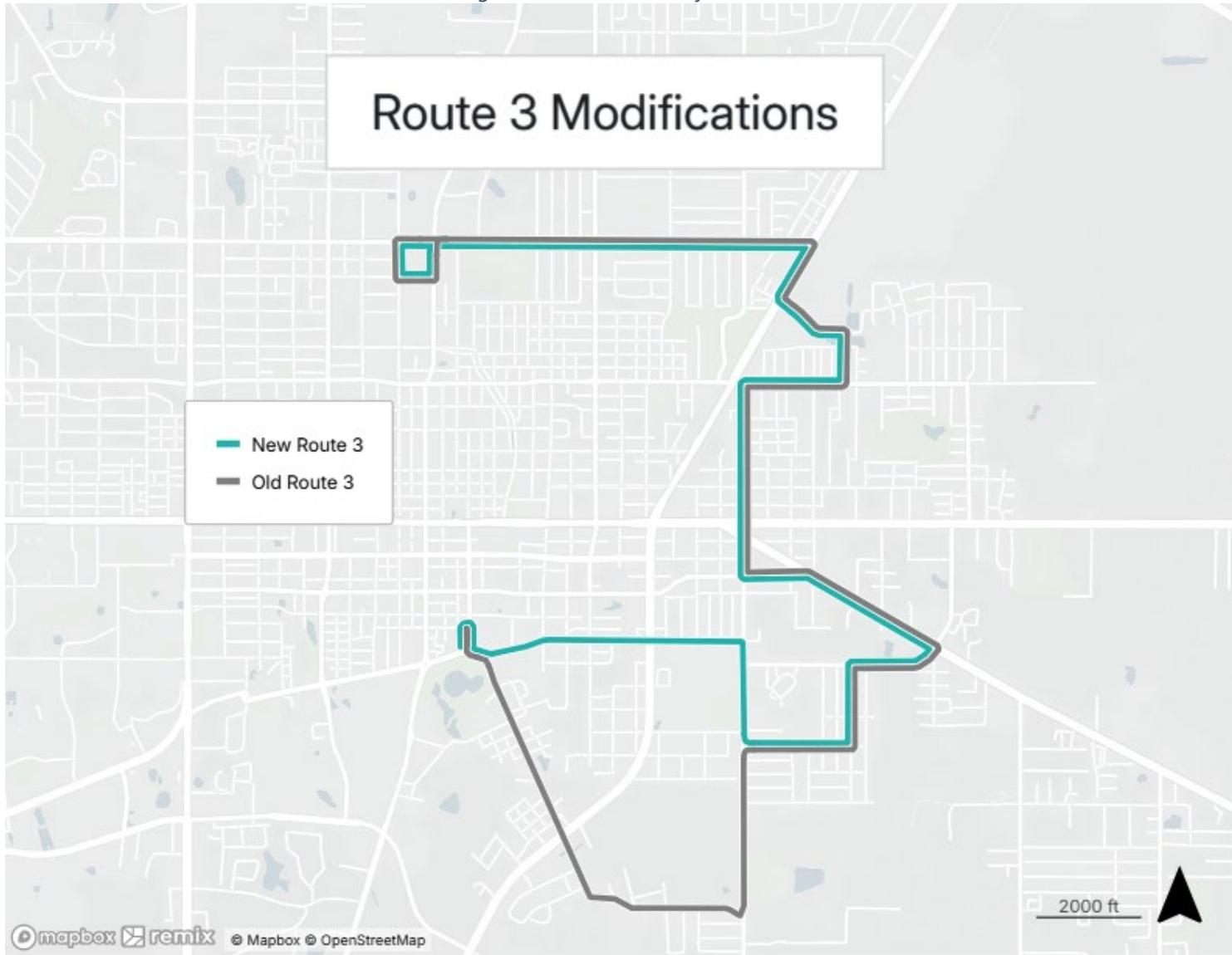


Figure 12: Route 6 Modifications



Figure 13: Route 7 Modifications

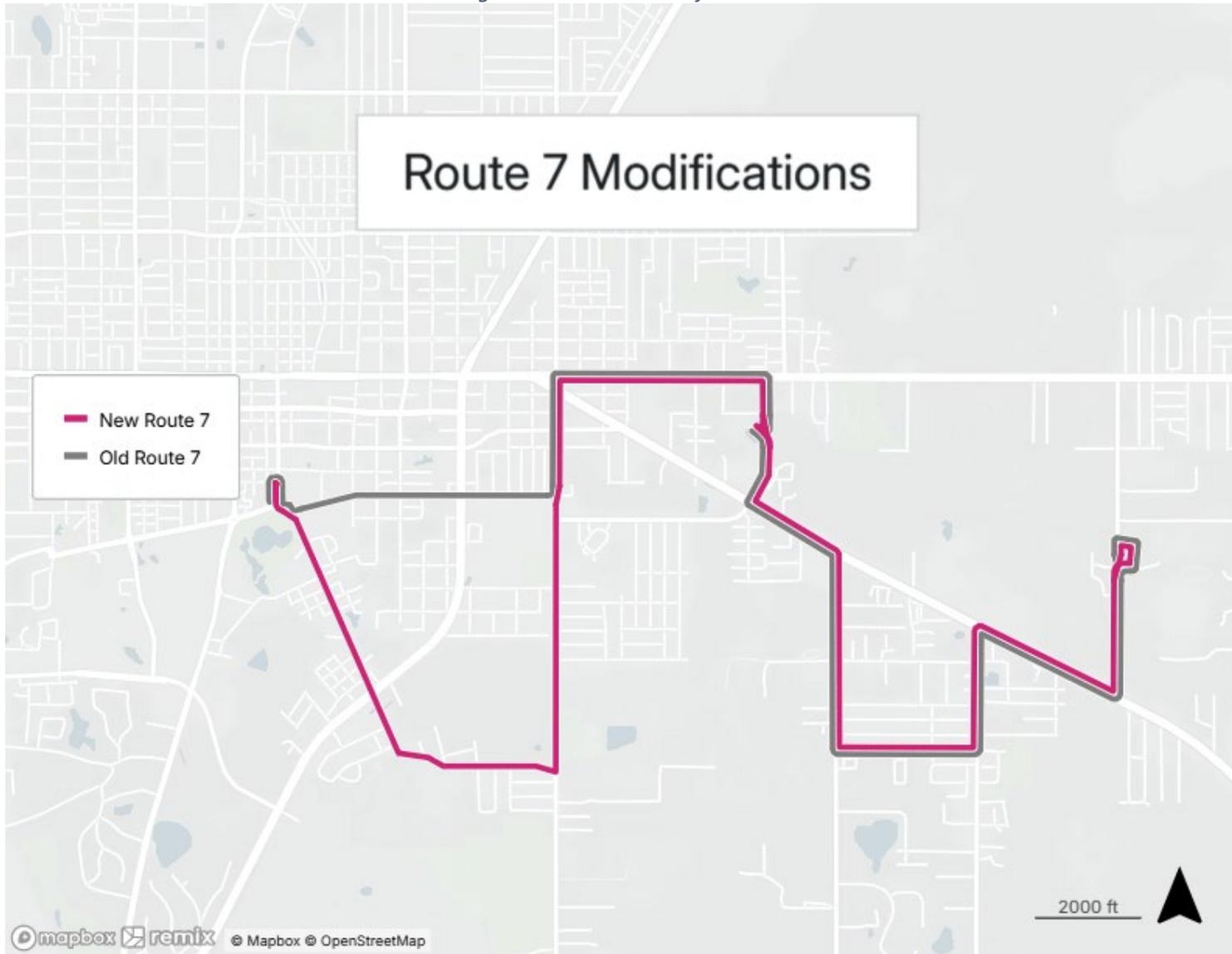


Figure 14: Route 12 Modifications

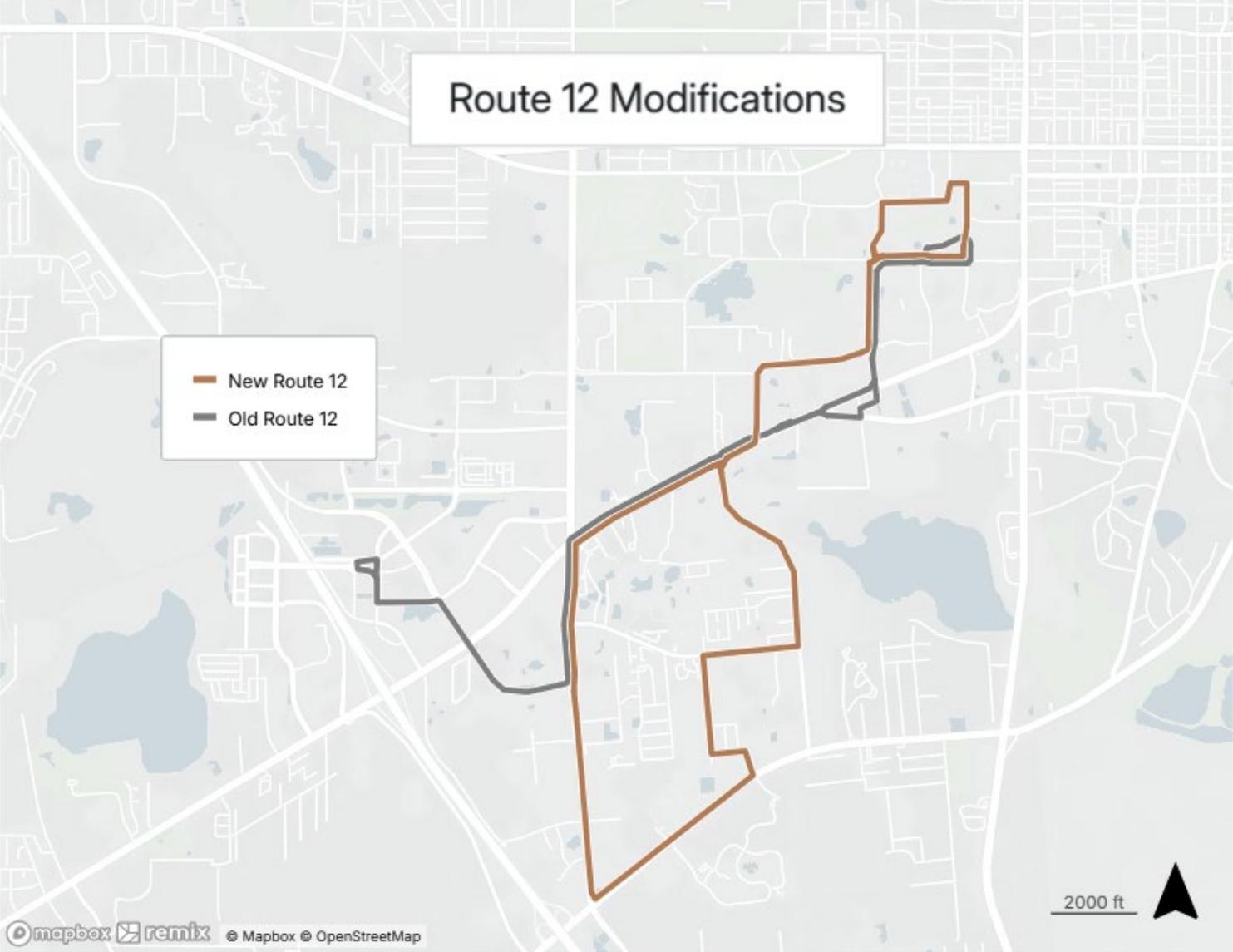


Figure 15: Route 13 Modifications



Figure 16: Route 17 Modifications

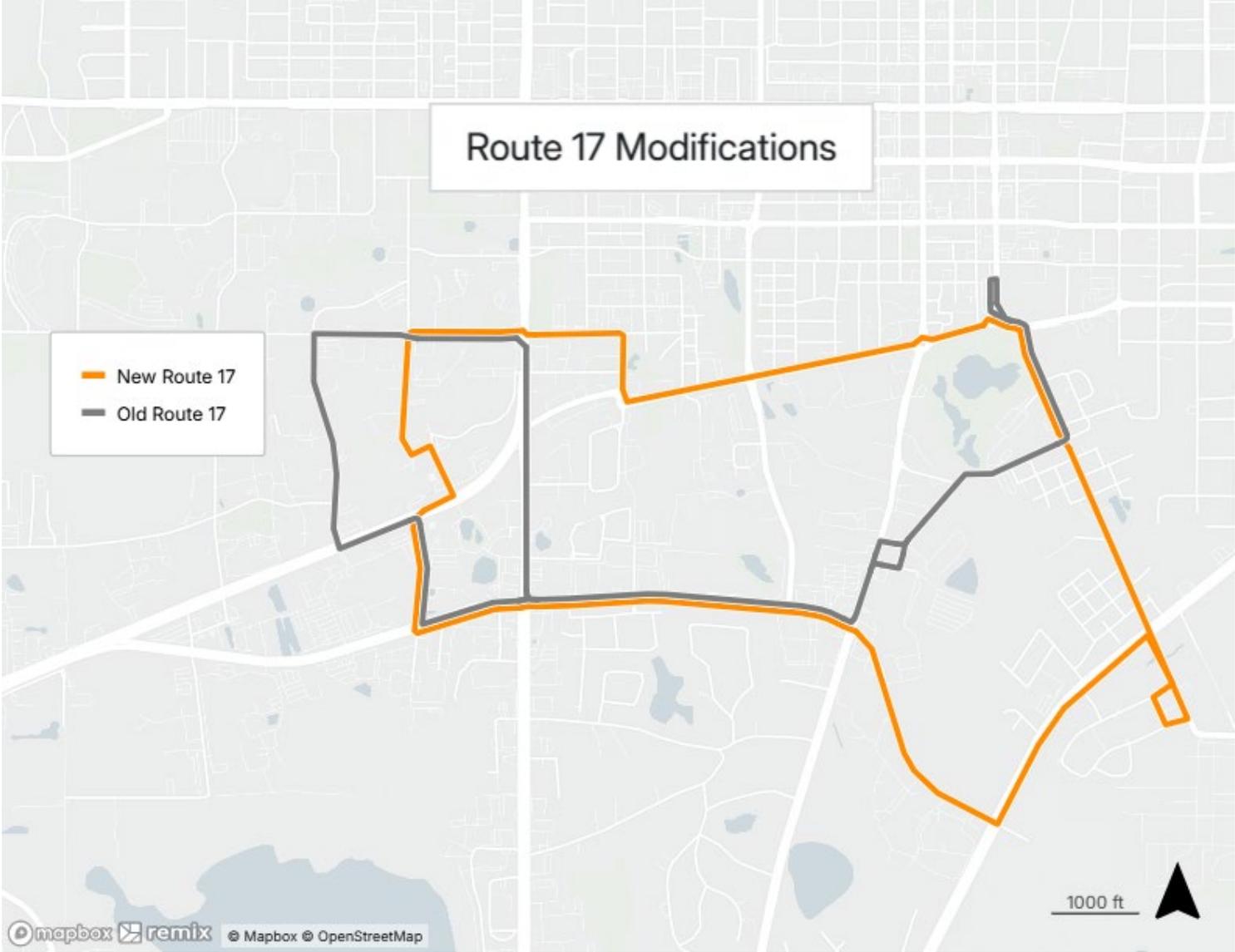




Figure 18: Route 33 Modifications

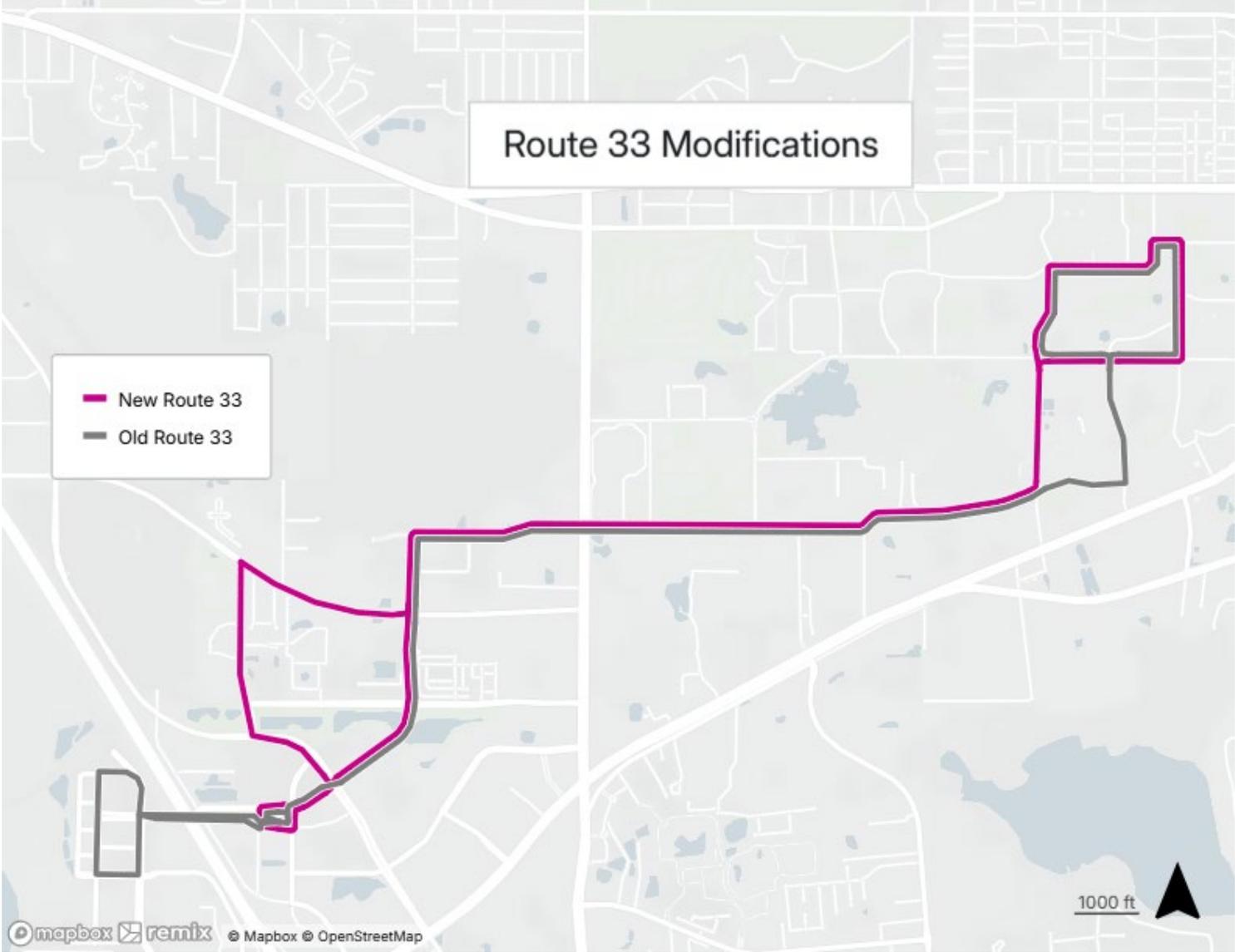
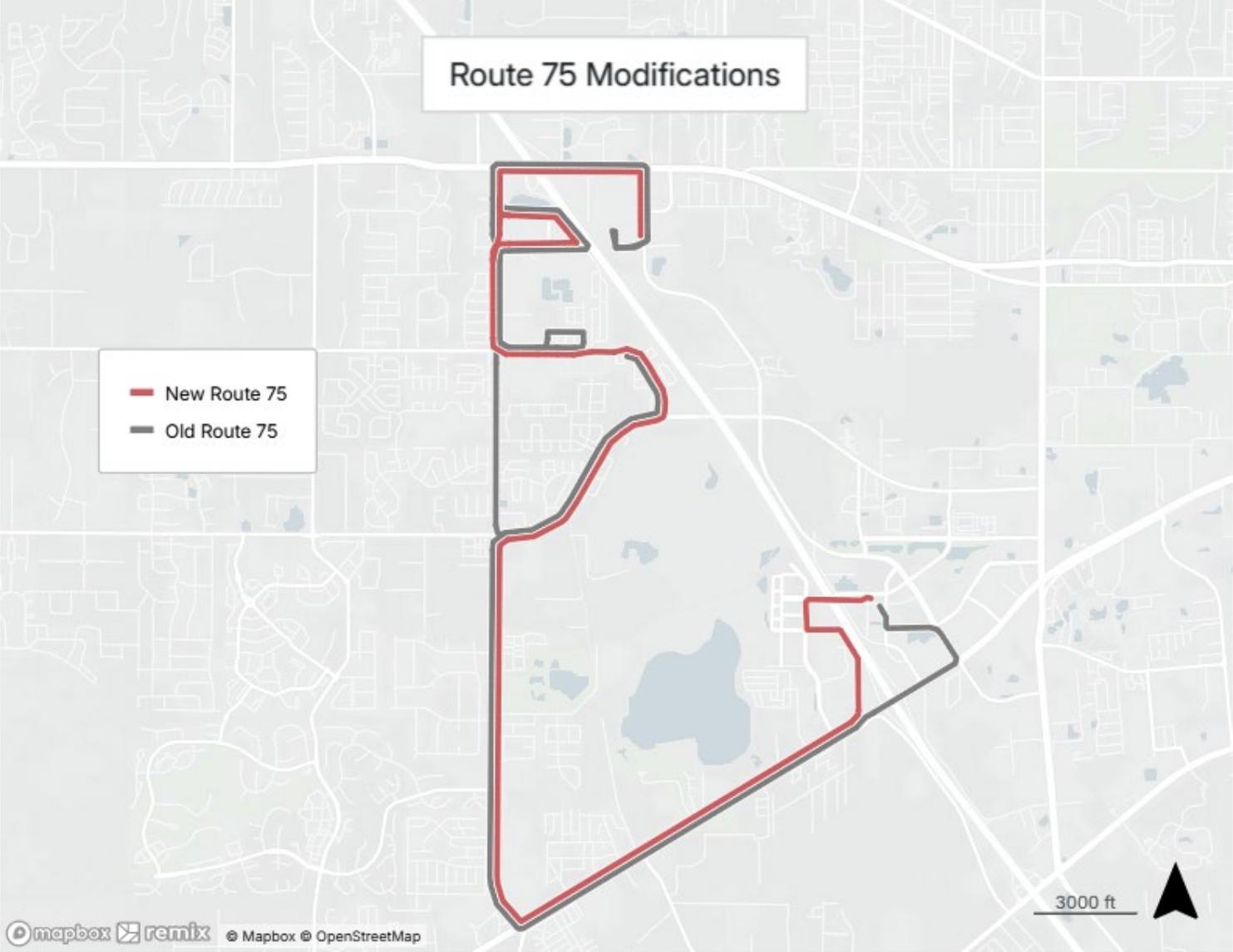


Figure 19: Route 75 Modifications



The following paragraphs describe additional conditions that will assist the agency in managing the impacts of routes slated for elimination – portions of those routes will be served by RTS' unaffected routes. In order to illustrate this, maps of each eliminated route and associated complementary routes have been developed. They show how the remaining routes will duplicate a 0.25 mile or longer portions of each eliminated route. The Newell Drive portion of Route 16 is supplanted by Routes 17 and 43. The 16<sup>th</sup> Avenue and 16<sup>th</sup> Street portions are covered by Routes 8 and 17 before 13<sup>th</sup> street, and Route 17 continues to cover the 16<sup>th</sup> Avenue portion and Williston Road portion after 13<sup>th</sup> Street. The 4<sup>th</sup> Street portion is covered by Route 17. The 13<sup>th</sup> Street portion is covered by Routes 1, 8, and 13, and finally, the Museum Road portion will be covered by Routes 1, 8, 13, 17, and 43. Nearly all of Route 16 segment will be supplanted by the modified Route 17 (see Figure 20).

Meanwhile, Route 21 will be duplicated almost in its entirety by Route 20 (see Figure 21). The Museum Road, Radio Road and Bledsoe Drive portions will be covered by Routes 20, (118, 126, and the *Westside Circulator*). Meanwhile, the Hull Road portion will be covered by Routes 20, 33, 52, and (the *Westside Circulator*). The 34<sup>th</sup> Street portion will be covered by Route 20. The 38<sup>th</sup> Terrace portion will be covered by Route 33 and the 43<sup>rd</sup> Street portion will be covered by Route 78. The 20<sup>th</sup> Avenue portion will be covered by Routes 20, 52, and 78. Only two portions of the Route 21 will not be supplanted - the 24<sup>th</sup> Street portion, which contains no stops on the Route 21 in the first place, but will be walkable to Route 33 and 78 stops, and the 52<sup>nd</sup> Street portion south of 16<sup>th</sup> Place, whose stop will be walkable to the nearest Route 20 stop.

The overlap between Route 28 and the remaining routes is shown in Figure 22. The University Avenue portion of Route 28 is replicated by Routes 5 and 43. The Museum Road, Radio Road, and 34<sup>th</sup> Street portions are covered by Route 20. The 20<sup>th</sup> Avenue portion is covered by Routes 20 and 52, while the 43<sup>rd</sup> Street and Clark Butler Boulevard portions are covered by Route 78. The Stadium Road portion east of Gale Lemerand Drive is covered by Routes 9, 12, 33, 38, and 126, as well as the North-South and Westside Circulators. The portion west of Gale Lemerand will be covered by the 126 and the Westside Circulator. Although that portion of Route 28 that runs along Village Drive is not duplicated, the portion contains no stops, but is walkable to the nearest Route 20 stop and the Westside Circulator service.

The overlap map for Route 34 is shown in Figure 23. The University Avenue portion of Route 34 is duplicated by both Routes 5 and 43, and Route 5 also duplicates Route 34's 2<sup>nd</sup> Avenue portion. The 34<sup>th</sup> Street portion is covered by Route 20 between Hull Road and 20<sup>th</sup> Avenue, by Route 37 between 35<sup>th</sup> Place and 39<sup>th</sup> Boulevard, and by Route 12 south of Archer Road. Like Route 28, the Stadium Road portion, east of Gale Lemerand Drive, is covered by Routes 9, 12, 33, 38, and 126, as well as the North-South and Westside Circulators. The portion west of Gale Lemerand will be covered by Route 126/Westside Circulator.

Route 35 is almost entirely covered by remaining system routes and is very similar to Route 12 (see Figure 24). The portion of Route 35 on Center Drive will be covered by Routes 8, 37, 38, 43, and 52, as well as the North-South Circulator. The Archer Road portion will be covered by Routes 1, 9, 12, 37, and 38. The portion of Route 35 connecting Gale Lemerand and Shealy Drive will be replicated by the North-South Circulator. The 23<sup>rd</sup> Street and 23<sup>rd</sup> Terrace portions will be covered by Routes 9, 12, and 37. The 35<sup>th</sup> Place portion will be covered by Routes 9, 12, and 37. Routes 9 and 12 will also cover the 27<sup>th</sup> Street portion. Route 12 will cover the Williston Road portion. Finally, Routes 12 and 37 will cover the 34<sup>th</sup> Street portion.

Finally, Route 711 will be fully absorbed by Routes 7 and 11 (see Figure 25). The 3<sup>rd</sup> Street portion of route 711 will be covered by Routes 1, 5, 10, 11, 15, and 26. Route 711's University Avenue, 9<sup>th</sup> Street, 8<sup>th</sup> Avenue, Waldo Road, and 25<sup>th</sup> Street portions will all be covered by Route 11. The 12<sup>th</sup> Avenue portion will be covered by Routes 3, 11, and 26. The 43<sup>rd</sup> Street portion will be covered by Routes 7 and 11. Route 7 will cover the Hawthorne Road, 35<sup>th</sup> Street, 21<sup>st</sup> Avenue, 27<sup>th</sup> Street, and 24<sup>th</sup> Street portions.

Figure 20: Route 16 Overlap Map

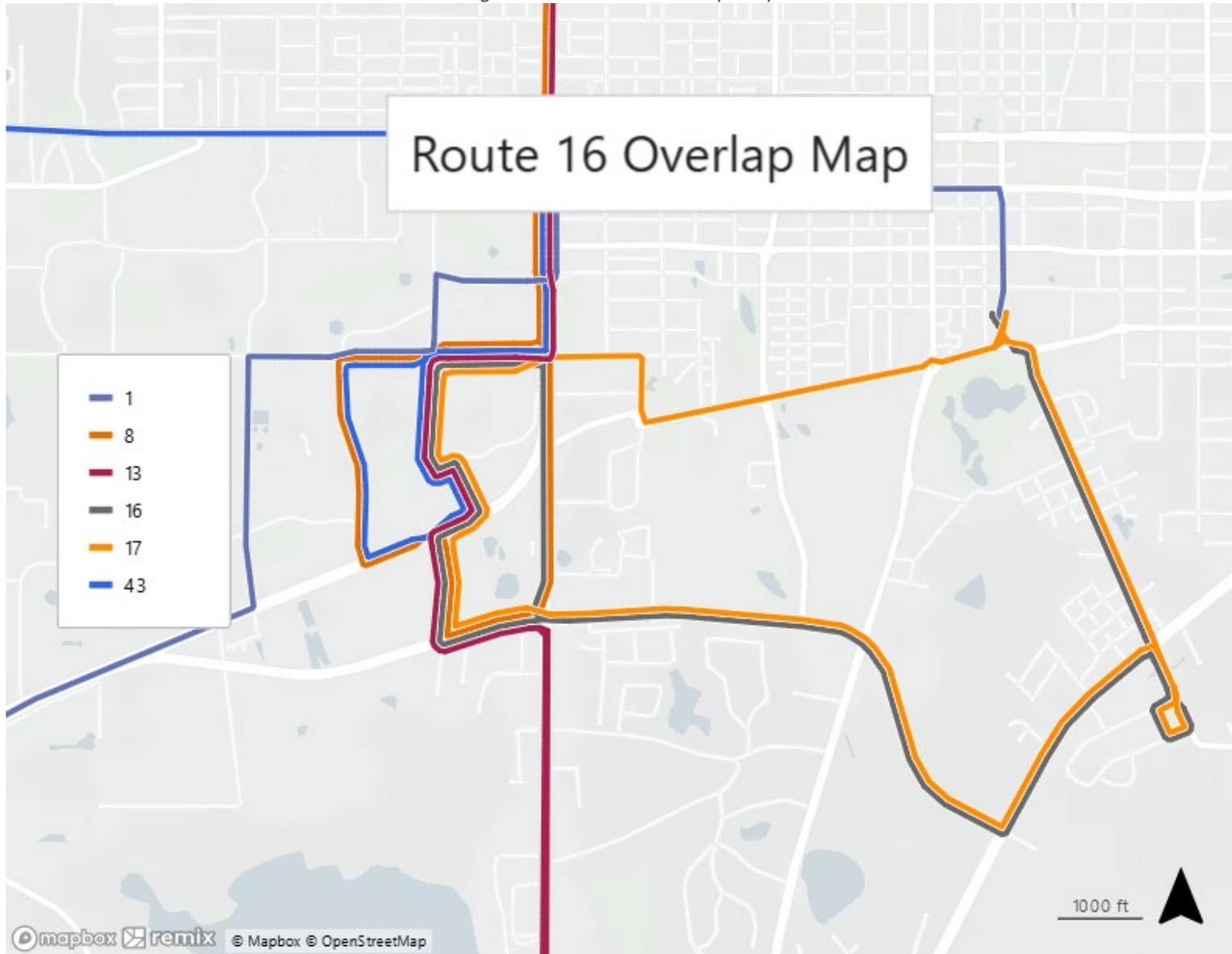


Figure 21: Route 21 Overlap Map

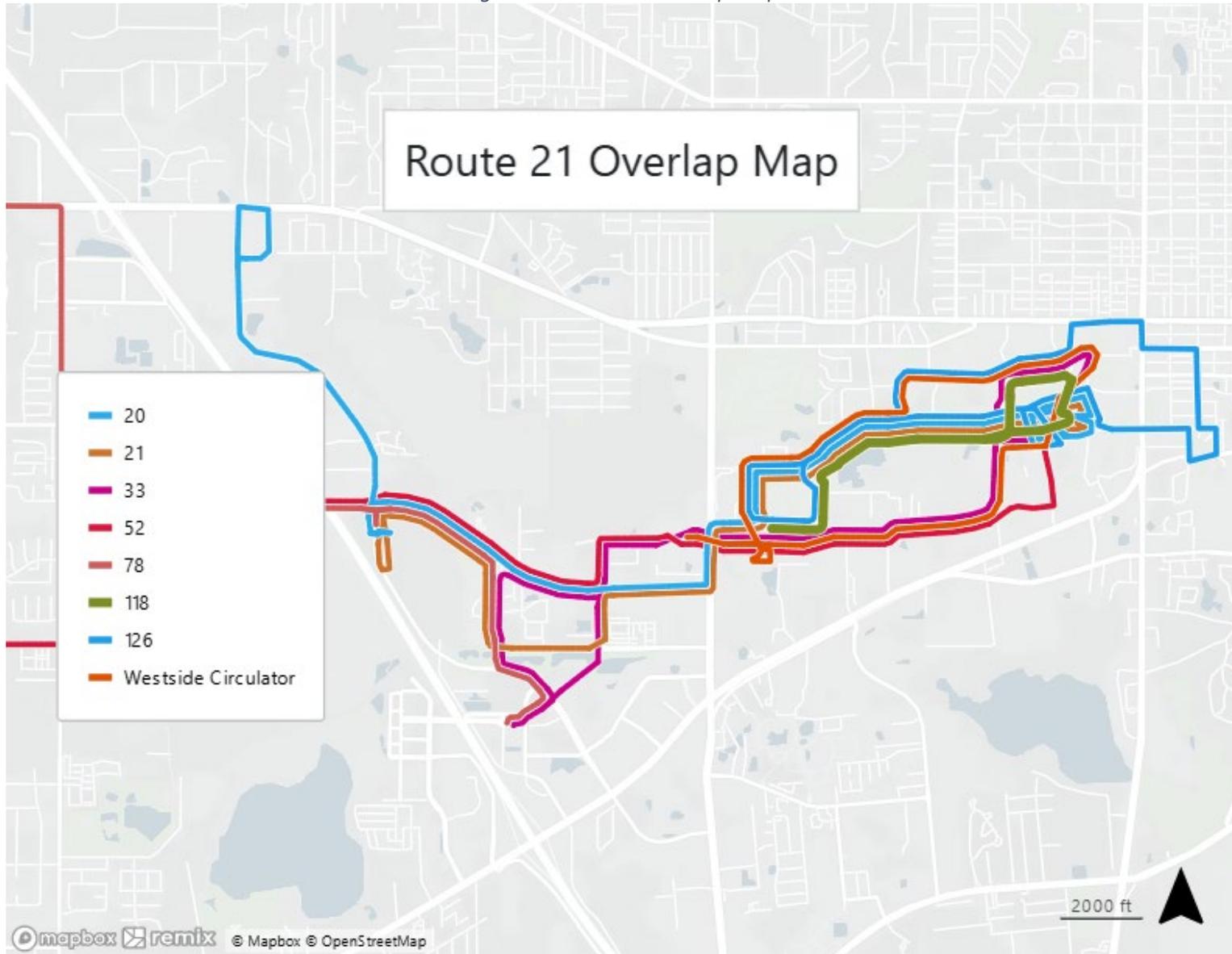


Figure 22: Route 28 Overlap Map

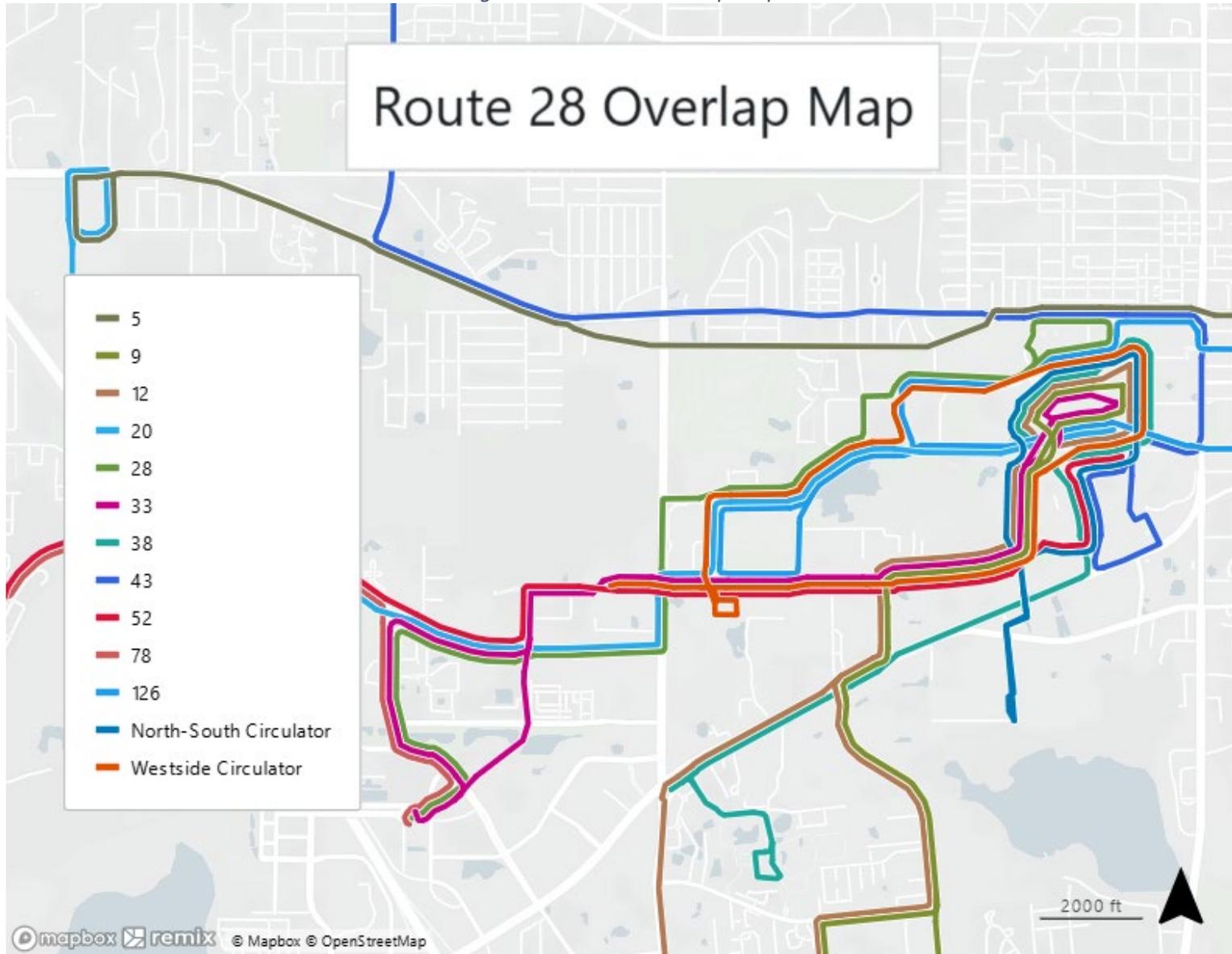


Figure 23: Route 34 Overlap Map

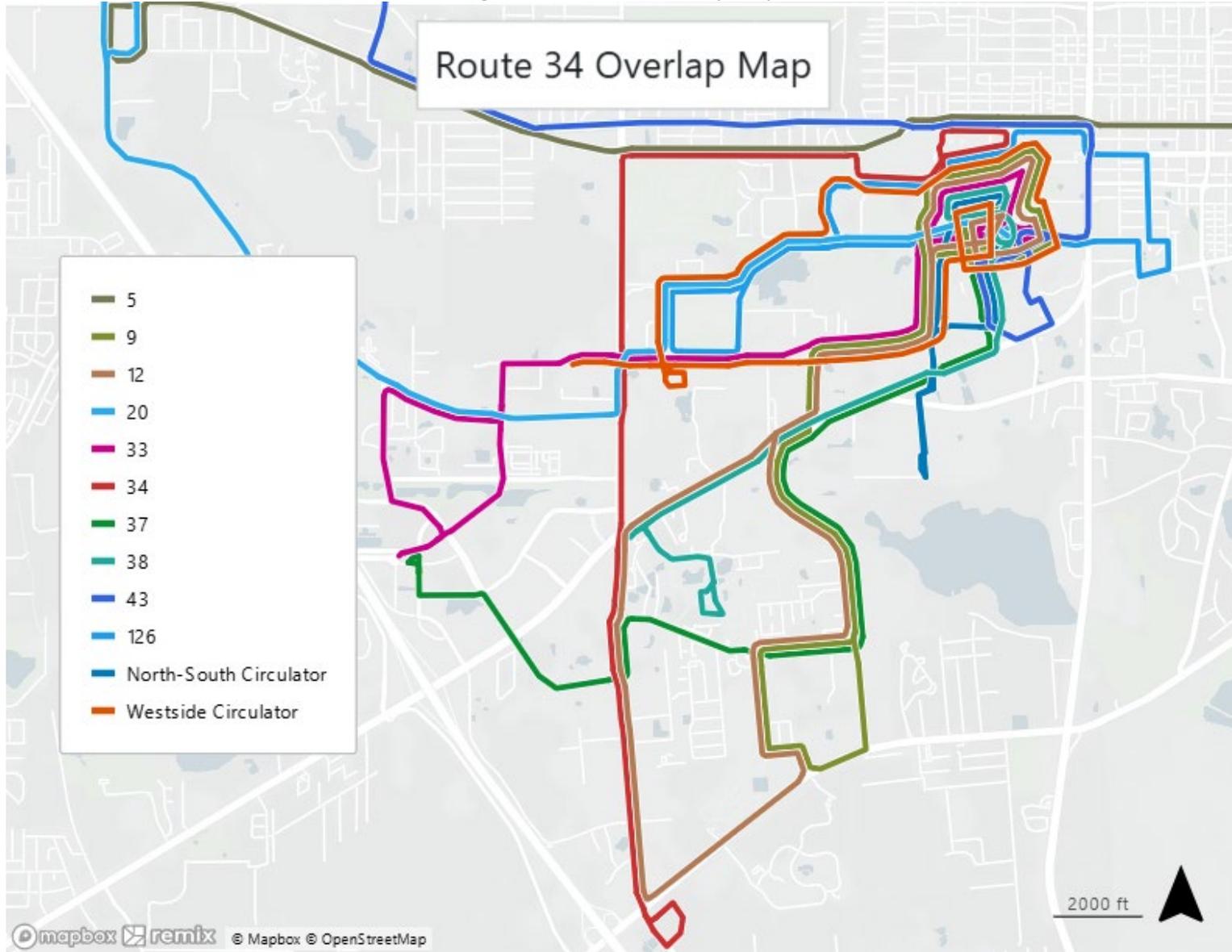


Figure 24: Route 35 Overlap Map

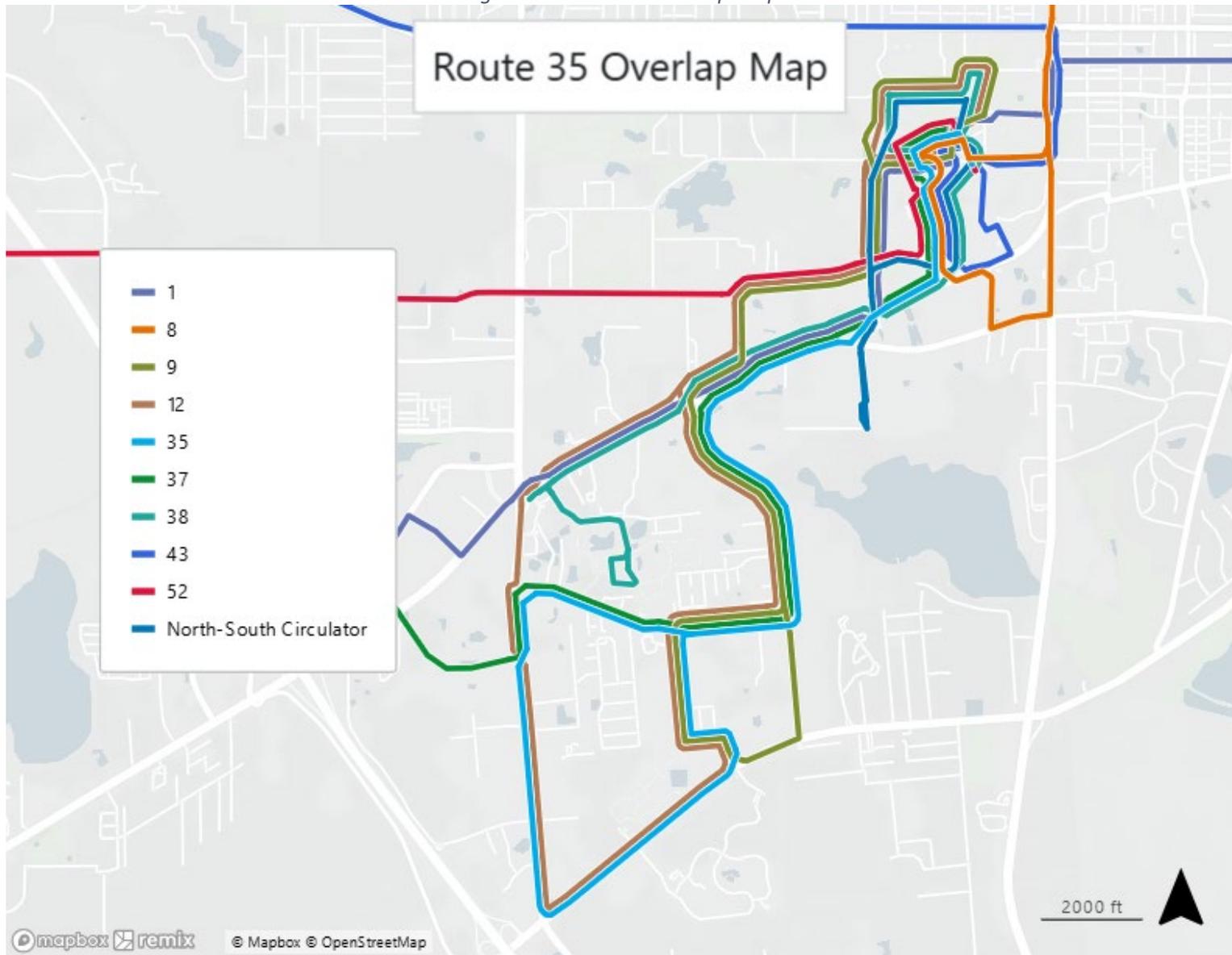
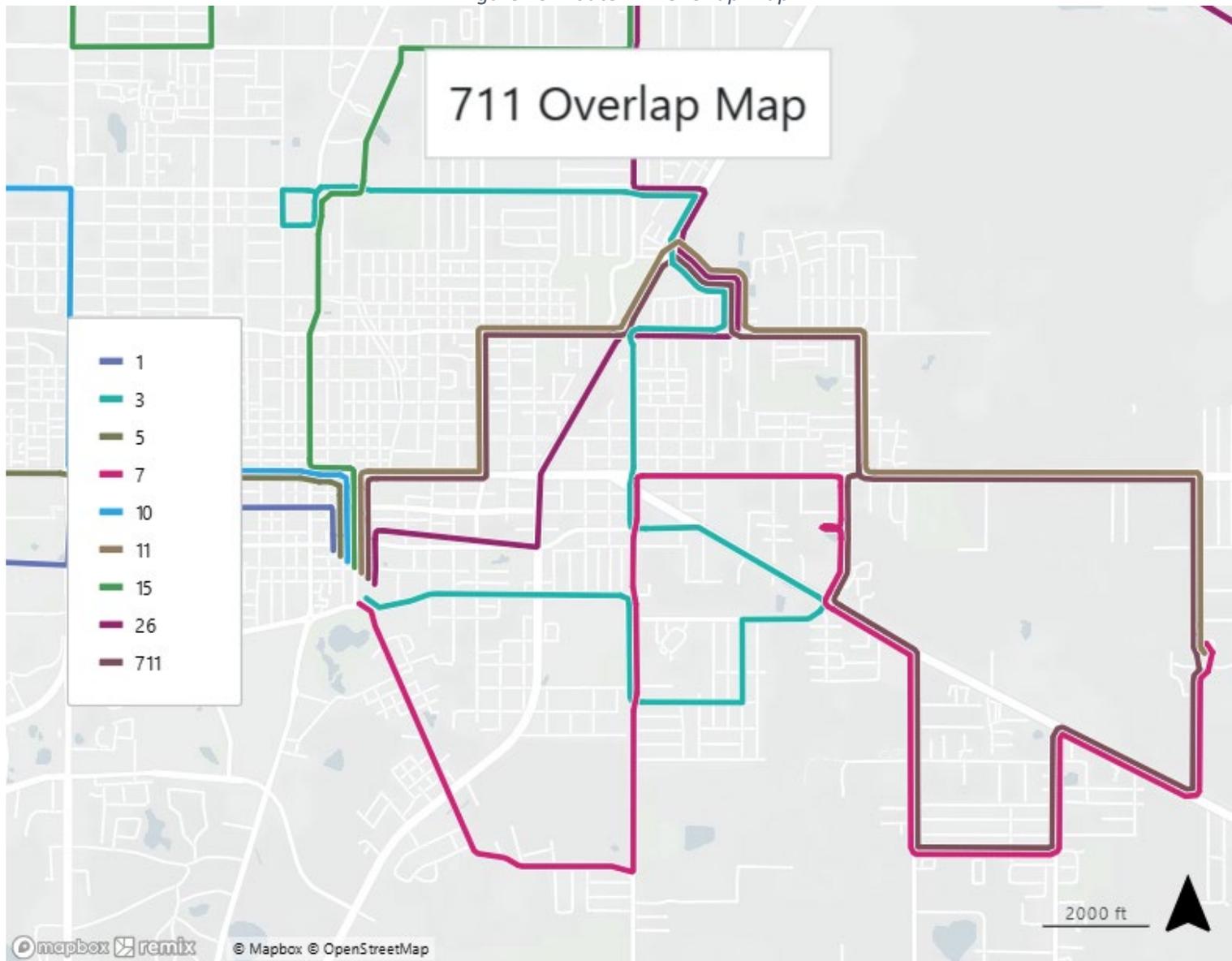


Figure 25: Route 711 Overlap Map



## IX. Conclusion

The Gainesville Regional Transit System is proposing a major service change in Fall 2025 involving the modification of ten routes (1, 3, 6, 7, 12, 13, 17, 20, 23, 33, and 75), the elimination of four routes (16, 21, 34, 35), and the absorption of Route 711 by Routes 7 and 11. Although all routes affected by the major service change result in either disparate impact, disproportionate burden, or both, RTS intends to move forward with these proposed changes, as the changes come as the result of the reduction in the level of financial contribution (from 49.2% to 36.9%) by the University of Florida to RTS' operating funds. The financial reduction translates to a reduction in the number of RTS' fixed routes and total hours of service. As noted before, UF TAPS will take over the operation of the 100-series routes and make them parts of the three Campus Connector route system which will operate as a premium service using ADA-accessible vans. According to the University, they are also designed to operate at higher frequencies, and greater spans than are currently available. Finally, some sections of the routes proposed for elimination will be covered by routes that will remain in RTS service. This, in addition to the service offered by UF Connector Service structure, will minimize and mitigate the impacts of the Major Service Change proposed by RTS for Fall 2025.