

2021 Title VI Program Update

2019 to 2021 Report to the Federal Transit Administration
in accordance with The Civil Rights Act of 1964 and FTA Circular 4702.1B
Title VI Program Guidelines for Federal Transit Administration Recipients



City of Los Angeles Department of Transportation
Office of Transit Services

TITLE VI PROGRAM UPDATE

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ATTACHMENTS

- A: LADOT Transit's Annual Certifications and Assurances
- B: Council File 18-1036
- C: Title VI Complaint Form in Tagalog and Spanish
- D: Title VI In-Vehicle Notice
- E: LADOT Transit's Title VI Plan Adoption and Signature Page

APPENDICES

- 1: LAnow Title VI Service Equity Analysis
- 2: DASH to Class Title VI Fare Equity Analysis
- 3: LEP Plan

INTRODUCTION

The City of Los Angeles Department of Transportation's Transit Services Office-LADOT Transit is committed to providing the highest quality and most appropriate levels of transit services for all those who live, work, and visit the City of Los Angeles. It has been 58 years since the passage of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin in programs and activities that receive Federal funding, such as LADOT Transit's services. LADOT Transit's Commuter Express, DASH, Cityride and LAnow services have always been provided with the commitment to equal access for minorities, persons with limited English proficiency (LEP), and low-income populations.

NO PERSON IN THE UNITED STATES SHALL, ON THE GROUND OF RACE, COLOR, OR NATIONAL ORIGIN, BE EXCLUDED FROM PARTICIPATION IN, BE DENIED THE BENEFITS OF, OR BE SUBJECTED TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY RECEIVING FEDERAL FINANCIAL ASSISTANCE.

This program update was prepared to document LADOT Transit's compliance with the Title VI requirements of the Federal Transit Administration's (FTA) Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." This document covers the period from November 18, 2018, to December 1, 2021.

LADOT Transit serves a minority-majority population city.¹ Everyday DASH, Commuter Express, Cityride and LAnow play an important role in the lives of minority, low-income and LEP households. Meeting the needs of these populations is a priority in the planning and delivery of all LADOT Transit services as well as duty of every LADOT Transit employee whether they work for the city or one of LADOT Transit's private contractors. LADOT Transit will use this Title VI program to ensure that its commitment to equity, diversity and inclusion remains steadfast.

Overview – LADOT Transit

Transit services have been provided by the City of Los Angeles Department of Transportation (LADOT Transit) for 37 years, starting with consolidation of city-operated, dial-a-ride services for seniors and the disabled followed by assumption of the operation of the Downtown Mini-Ride shuttle service in 1985. LADOT Transit was first designated by the Los Angeles County Transportation Commission (predecessor to the Los Angeles County Metropolitan Transportation Authority or Metro) as an Included Eligible Municipal Operator in 1991.

The City of Los Angeles Department of Transportation is a department of the City of Los Angeles, an incorporated municipality and charter city under the laws of the State of California. LADOT Transit provides express bus, neighborhood circulator bus, voluntary paratransit services, on-demand micro-transit, and charter bus services to the greater Los Angeles region. In the past five years LADOT Transit services carried more than 100 million riders, the majority of whom were minority and low-income riders.² LADOT Transit's neighborhood circulator, workday commuter,

¹ US Census-2010 and 2020

² LADOT Transit National Transit Database Reports-2016 to 2020

and senior and disabled services consistently receive high ratings from the riders of these services.³ LADOT Transit's services play a major role in the regional transportation infrastructure providing access to the rail, bus rapid transit and bus network developed by the Los Angeles County Metropolitan Transportation Authority (Metro) and providing connections to AMTRAK and Metrolink long-distance rail services.

As the LADOT Transit service area is one of the most diverse in the nation, LADOT Transit provides multilingual customer services and user information. The development of multilingual user information is guided by LADOT Transit's LEP Plan, which identifies the reasonable steps for providing language assistance to persons with limited English proficiency who wish to access its services. The LEP Plan is important to the delivery of LADOT Transit's customer services and the development of its user information as 59% of the service area population speak another language other than English and 40.2% speak English less than very well.⁴

The City of Los Angeles' Bureau of Street Services (StreetsLA) manages the transit shelters and benches that are distributed throughout the city. Streets LA utilizes LADOT Transit ridership as a major factor in its distribution and siting criteria for shelters and benches. That criterion requires that 75% of all bus riders in each of the City's 15 Council Districts can board where shelters or shade structures are installed. Ensuring the equitable distribution of transit amenities is guaranteed through StreetsLA's distribution and siting criteria.

The policies and standards utilized by LADOT Transit to design and deliver its services are reviewed and approved by three representative bodies: the Los Angeles City Council, the Board of Transportation Commissioners, and the City of Los Angeles Taxicab Commission. LADOT Transit contracts with private service providers for the provision of all its services, and those contractors are made aware of and required to comply with the Title VI responsibilities of LADOT Transit as part of their contractual obligations to the agency. The planning, marketing, monitoring, and funding of the services are the responsibility of the LADOT Transit staff under the direction of the General Manager of LADOT and LADOT's Chief of Transit Programs.

LADOT TRANSIT IS COMMITTED TO ENSURING THAT NO PERSON IS EXCLUDED FROM PARTICIPATION IN OR DENIED THE BENEFITS OF ITS SERVICES ON THE BASIS OF RACE, COLOR OR NATIONAL ORIGIN AS PROTECTED BY TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED.

Pursuant to the requirements of the United States Department of Transportation's Federal Transit Administration (FTA) Circular 4702.1B, LADOT Transit has established and monitors the performance of its services utilizing quantitative and qualitative service policies and standards. LADOT Transit has established service and fare equity policies to evaluate the impacts of a major service and fare changes on minority and low-income populations as detailed in this report. Those policies have proven to be beneficial to low-income and minority populations as they have

³ LADOT Transit On-Board Customer Satisfaction Surveys-1992 to 2017

⁴ US Census Bureau, American Community Survey (ACS), 5-Year Estimates 2015-2019

expanded service frequency and coverage, and, introduced low and no fare options that directly benefit these populations.

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the USDOT's Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA.

LADOT Transit's Annual Certifications and Assurances are contained in **Attachment A**.

Overview – Title VI

Title VI removes barriers and conditions that prevent minority, low-income, LEP, and other disadvantaged groups and persons from receiving access to, participating in, and benefitting from federally-assisted public programs, services, and activities. In effect, Title VI promotes fairness and equity in federally-assisted programs and activities and is based on the fundamental principle that all human beings are created equal. Title VI reaffirms the constitutional guarantee that all human beings are entitled to equal protection of the law while specifically addressing the involvement of impacted persons in the decision-making process.

Title VI Discrimination

There are many forms of illegal discrimination based on race, color, or national origin that can limit the opportunity of under-represented communities to gain equal access to public services and programs. In operating a federally-assisted program, a recipient cannot, based on race, color, or national origin, either directly or through contractual means:

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

Additionally, related regulations and statutes expanded the range and scope of Title VI coverage and applicability to prohibit discrimination based on disability, age, sex, income, and limited English Proficiency (as an extension of national origin).

Programs Covered by Title VI

The Civil Rights Restoration Act of 1987 amended each of the affected statutes by adding a section defining the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance. LADOT Transit is a recipient of Federal Transit Administration grants and must comply with this requirement.

The FTA requires that all direct and primary recipients document their compliance with the USDOT's Title VI regulations by submitting a Title VI Program to their FTA Regional Civil Rights

Officer once every three years. For all recipients, the Title VI Program must be approved by the recipient's Board of Directors or appropriate governing entity (City Council) or official(s) responsible for policy decisions prior to submission to FTA.

In 2001, the Los Angeles City Council granted the General Manager of the City's Department of Transportation, or their designee, the authority to execute and file the administrative paperwork on behalf of City of Los Angeles with the Federal Transit Administration (FTA) for Federal Assistance authorized by 49 U.S.C. Chapter 53, Title 23, United States Code, or other Federal statutes authorizing a project administered by the FTA, including the annual certification of assurances and other documents the FTA requires before awarding a Federal assistance grant or cooperative agreement. This authority was reaffirmed in 2004 and 2018 by City Council. A copy of the 2018 council file 18-1036 showing adoption of the motion is included as **Attachment B**.

Current Status of Compliance with Title VI Program Requirements

LADOT Transit submitted its "2018 Title VI Program Update," in compliance with the previous Title VI Circular requirements, on November 1, 2018. The Federal Transit Administration (FTA) reviewed that submission and considered LADOT Transit to be in compliance.

In accordance with this submittal, LADOT Transit has monitored and evaluated system performance, relative to the service standards and policies contained herein, consistently over the past three years in compliance with its own policies and the requirements of Title VI.

PART I – GENERAL REQUIREMENTS

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

1. Public Notice
2. Complaint Procedures
3. List of Investigations, Complaints, and Lawsuits
4. Public Participation Plan
5. Language Assistance Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Equity Analysis (if applicable)

Title VI Notice

LADOT Transit Title VI Policy Statement

The Los Angeles City Department of Transportation complies with all federal requirements under Title VI of the Civil Rights Act of 1964, as amended. LADOT 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.

LADOT Transit posts the Title VI public notice on the agency website, in all vehicles, and in the LADOT Transit Customer Service Center located in the LA Mall in Downtown Los Angeles. The complaint procedures are available on the ladottransit.com website and the Customer Service Center. A Title VI complaint form is available on the website and at the Customer Service Center that can be used to file a complaint. The complaint form, in Tagalog and Spanish, is included as **Attachment C**, and the in-vehicle notice is included as **Attachment D**.

Below is a chart depicting the level of Title VI Notification dissemination by location:

Title VI Notification Displays

Location	Medium for Display	Number⁵
Transit Buses/Vans	Paper Posting	394
Website	Webpage	670 click throughs
Downtown LA locations	Digital Displays Paper Posting	Six (6)
Collateral Materials Service Area Wide	Flyers (for pick up)	310,000
Annual Walk-ins	Pre-Pandemic	5000
Comments Received Through Website		Title VI related 0

Title VI Complaint Procedure

Any person who believes they have been offended by an unlawful discriminatory practice based on race, color, or national origin by LADOT Transit may file a complaint by completing and submitting LADOT Transit's Title VI Complaint form.

LADOT Transit's Title VI complaint procedures are posted on all LADOT Transit vehicles, on the ladottransit.com website, in its Customer Service Center, on its mobile digital display system inside of its Commuter Express and DASH fleets, and its digital kiosk information screens in the LA Mall.

⁵ Average annual numbers for years 2018, 2019 and 2020; Downtown LA locations include Customer Service Center and LADOT offices.

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a Title VI complaint with LADOT.

The complaint must be filed within 180 days of the date of the alleged discrimination. To file a formal complaint, you may download the complaint form in English, (other languages are available at the links above) or you can pick up a form at the LADOT Transit Customer Service Center, 201 N. Los Angeles St, Space 16, Los Angeles, CA 90012. Written complaints may be sent to:

*Title VI Liaison
LADOT Transit Bureau
100 S. Main Street, 10th Floor,
Los Angeles, CA, 90012*

You may also email us (ladot.titlevi@lacity.org) or you may contact the Title VI Liaison at 213-928-9769.

Complainants will receive a written response from LADOT with regard to their complaint. LADOT will endeavor to complete the investigation and send a written response within 60 days of receipt of the complaint.

In addition to the Title VI complaint process at LADOT, a complainant may file a Title VI complaint with the Federal Transit Administration, Office of Civil Rights, Region IX, 201 Mission Street, Suite

Any customer who files a general complaint directly through ladottransit.com or in person to the LADOT Transit Customer Service Center referring to discrimination on the basis of race, color or national origin is directed to or provided with LADOT Transit's Title VI complaint form and complaint procedures.

Any complaints that are received alleging the violation of civil rights are given priority status. LADOT Transit's review, investigation and resolution of Title VI complaints is conducted by the Supervising Transportation Planner/Division Head for Transit Grants, Budget, and Procurement.

LADOT Transit investigates complaints received no more than 30-days after receipt of the complaint. LADOT Transit will process complaints that are complete and verified by investigation. Once a completed complaint is received, LADOT Transit will review it to determine its jurisdiction. The complainant will receive an acknowledgement letter informing whether the complaint will be investigated by LADOT Transit.

LADOT Transit will complete an investigation within 60-days from receipt of a completed complaint form. LADOT Transit may contact the complainant if more information is needed to resolve the case. Unless LADOT Transit specifies a longer period, the complainant will have ten days from the date of the letter to send requested information to the LADOT Transit Investigator assigned to the case.

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

After an investigation is complete, LADOT Transit will issue a letter to the complainant summarizing the results of the investigation, stating the findings, and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with LADOT Transit's determination, a reconsideration request may be made by submitting a request in writing to LADOT Transit's Chief of Transit Programs within seven days after the date of LADOT Transit's letter, stating with specificity the basis for the reconsideration. The LADOT Transit Chief of Transit Programs will notify the complainant of his/her decision either to accept or reject the request for reconsideration within ten days. In cases where reconsideration is granted, LADOT Transit will issue a determination letter to the complainant upon completion of the reconsideration review.

Title VI Complaints, Investigations, and Lawsuits

LADOT Transit received one Title VI complaint for the reporting period of 2018 to 2021. The complaint was investigated by LADOT Transit and its service contractor, MV Transit. It was determined that the dispute was not a valid Title VI complaint, but a fare payment related incident that resulted in a complaint.

Public Engagement Plan

LADOT Transit consistently engages the public to promote the use of its services and to identify unmet needs for transit service especially among minority, low-income and LEP populations. LADOT Transit has a dedicated Outreach Team whose sole purpose is to engage the public at community and special events and through regularly schedule outreach activities at schools and libraries seven days a week. Although the pandemic limited the ability of the Outreach Team to interact with the public directly, LADOT Transit heightened its online and social media activity to maintain its relationship with riders and the communities that it serves.

Public participation is directed by market research, both qualitative and quantitative that informs LADOT Transit's service design and delivery strategies. LADOT Transit's *Transit Service Analysis* (TSA) is the prime example of that strategy. Begun in 2017, the TSA was a data-driven effort to improve the quality and performance of all LADOT Transit services. The recommendations to increase frequencies on routes with the highest ridership, to restructure low-performing routes to better serve key destinations and add new services resulted from a collaborative process that included dozens of public hearings and workshops that engaged the public across the LADOT Transit service area. Community participation in the final recommendations of the analysis with

routing and stops being changed based upon community input. LADOT Transit began implementing the TSA recommendations in 2018 and that process continued through the period of reporting for this Title VI Program update.

Market research and public engagement also influence periodic service enhancements. LADOT Transit conducts surveys of its riders every two to three years to determine their satisfaction with the department's services and to prioritize those characteristics of service most important to riders. Those characteristics identified by riders are regularly monitored to ensure compliance with LADOT Transit's service standards.

LADOT Transit's Public Engagement Plans regularly engage minority, low-income and LEP populations. Engagement materials are developed in multiple languages according to the agency's existing LEP Plan as well as the Outreach Team's knowledge of the ethnic composition and languages spoken in the specific area.

From the previous service and fare equity analysis reports completed by LADOT Transit, those services and routes with significant minority, low-income and LEP populations are well known to the staff. Additionally, LADOT Transit has identified community-based, faith-based, and non-governmental organizations in every area in which services are operated. LADOT Transit regularly engages and coordinates with these organizations, often planning events with the participation and support of these groups.

LADOT Transit regularly engages in extensive community outreach in support of projects or studies to ensure that impacted residences, businesses, schools, community-based and faith-based organizations are informed about the impacts and benefits of a project and are provided an opportunity for input in planning and implementation. These outreach activities are guided by LADOT Transit's LEP Plan, ensuring that there is ready access to language-specific information or language interpretation support for LEP persons.

On routes serving neighborhoods where there are a significant number of LEP riders, LADOT Transit staff translates materials to ensure those populations can participate in outreach events and activities. When LADOT Transit stages Informal Meetings, Outreach Events, or Public Hearings it will often produce posters, handbills, or even advertisements in the languages identified as being spoken in the area that these events are staged. Special attention is paid to the identification of any transit-dependent persons potentially affected by a route or service change by onboard notifications, online promotion, news releases, and communications through the District Offices of the members of the Los Angeles City Council.

LADOT Transit continues to improve the methods by which it communicates with riders and the general public through regular evaluation of outreach activities at monthly internal marketing meetings, its use of social media including Instagram, Facebook, and Twitter, its communications with riders through the LA Mobile fare payment application, LADOT Bus and independent applications, and, most importantly, by solidifying relationships with community and faith-based

organizations, Council District offices, large employers, private and public schools and colleges, social service, and government agencies.

LADOT Transit consistently evaluates the effectiveness of the methods by which it communicates with the populations served by Commuter Express, DASH, Cityride, and LAnow. Outreach events are evaluated based on the number of contacts made at events and resulting ridership of services within the event area. Social media posts are similarly evaluated by measuring the number of followers, examining click through rates, and assessing reactions to posts. Website traffic is measured on a regular basis including overall traffic, average time on the site and average page views per visit.

Public Participation Highlights

The following is a summary of LADOT Transit's inclusive public participation since its 2018 Title VI Program submission. The following summary covers this review period and includes outreach conducted for any fare and service changes as well as for other projects during that period.

1. 2019, 2020, 2021 OUTREACH HIGHLIGHTS

LADOT Transit outreach efforts were significantly impacted by the pandemic during this reporting period. Prior to March 2020, LADOT Transit maintained a seven-day a week schedule of outreach activities that enabled the agency to engage with the public at hundreds of events across its service area.

- Outreach to community and faith-based organizations throughout the City of Los Angeles
- Ambassador Teams riding Commuter Express and DASH buses and attending events in neighborhoods
- Distributed materials through Los Angeles City Council District Offices
- Placed advertising on the interior and exterior of the LADOT Transit fleet to make riders and the public aware of service changes and the availability of the new TAP smart card
- Continued to develop the working relationship with the Los Angeles Unified School District to promote the use of LADOT Transit services to student populations resulting in the sale of DASH passes to LAUSD students
- Participated in more than five dozen employer-sponsored events to promote the use of LADOT Transit services
- Continued the working relationship with the Downtown Los Angeles Arts Community. In 2014, this relationship generated the LADOT Transit TAP Design Competition that enlisted local artists to design LADOT Transit's next generation of TAP smart cards.
- Increased the use of social media and grew the number of followers

2. 2019 OUTREACH HIGHLIGHTS

LADOT Transit also expanded its outreach team, dispatching team members to events seven days a week in an effort to provide more in-person/one on one information to riders and the general public, especially low-income, LEP, and minority riders. The outreach team and mobile sales van visit over 200 events and locations a year with regular monthly outreach at libraries, schools,

farmers markets, and community centers. Below is a partial list of events and locations that the mobile sales van and outreach team visited during this review period:

	2019	2020	2021
January	<ul style="list-style-type: none"> ● Adams & Vermont Farmers Market ● Central Farmers Market ● BofA Farmers Market ● Pico-Union Koreatown Library ● Winter Wonderland 2019 ● DASH Watts/Wilmington Outreach ● Overland Farmers Market ● Exposition Park Library ● Wilmington Farmers Market ● Washington Irving Library ● Highland Park Farmers Market ● Venice Abbot Kinney Library ● DASH Pueblo del Rio Outreach ● Lincoln Heights Farmers Market ● DTLA Farmers Market ● Camino Nuevo School ● Venice Farmers Market ● Echo Park Farmers Market ● Pajama Party: Movie Night Event ● East LA Art Walk ● THRIVE: Senior Fair ● Wilmington Library ● Arroyo Seco Library ● Wilshire Branch Library ● Central Library ● Mar Vista Library ● Vermont Square Library ● San Pedro Farmers Market ● Vernon Library ● Annual Community Day MLK ● 2019 MLK Community Day ● Beautification Day ● MLK Freedom Festival 2019 ● Northridge Library ● Eagle Rock Library ● Hollywood Library ● Studio City Library ● Watts Library ● Vida Sana Farmers Market ● Boyle Heights Carnival Party ● Power to the Youth Wellness Fair ● Westchester Farmers Market ● Leimert Park Art Walk ● LAnow Field Outreach ● Holmes Ave Elementary Parent Workshop ● Maternal & Children Center ● Para Los Niño's "DASH to Class" ● Malabar Library ● CD-9 Community Day 	<ul style="list-style-type: none"> ● Pico-Union Worksource "Reload" ● Maternal & Children Health Center ● LGBT Center "Reload" ● Downtown Value School Presentation ● Wilmington Library ● Arroyo Seco Library ● Highland Park Farmers Market ● Washington Irving Library ● Luther Burbank MS Presentation ● Eagle Rock Library ● Wilshire Branch Library ● Vermont Square Library ● Mar Vista Library ● Central Library ● San Pedro Farmers Market ● New Village Girls "Reload" ● Vernon Library ● MLK 2020 Freedom Festival ● Malabar Library ● William Jefferson Clinton MS Presentation ● Studio City Library ● DASH to Class Outreach "Lincoln Heights" ● Vida Sana Farmers Market ● Watts Library ● St. Anne's - Health & Resource Fair ● Leimert Park Art Walk ● Westchester Farmers Market 	<ul style="list-style-type: none"> ● All Events "Canceled"
February	<ul style="list-style-type: none"> ● BofA Farmers Market ● Pio Pico Library ● Montecito's Heights Open House 	<ul style="list-style-type: none"> ● Next Gen Bus Plan Event ● West LA Farmers Market ● Pico-Union Worksource "Reload" 	<ul style="list-style-type: none"> ● All Events "Canceled"

	<ul style="list-style-type: none"> • Lunar New Year Festival • Overland Farmers Market • Maya Angelou Parent Workshop • Maternal & Children Center • LAnow Field Outreach • Exposition Park Library • San Pedro Library • Junipero Serra Library • Pueblo De Rio Community Meeting • Santa Monica Community Presentation • Little Tokyo Senior Presentation • Central Farmers Market • Venice Farmers Market • New Village Girls "Reload" • Echo Park Farmers Market • Reseda Fit Health & Wellness Event • East LA Art Walk • Wilmington Library • Arroyo Seco Library • Old Adult Transportation Pop-up • Saito High School Community Meeting • Washington Irving Library • Highland Park Farmers Market • Santa Monica Elementary Coffee with the Principal Presentation • Venice-Abbot Kinney Library • City Hall Farmers Market • Lockwood Elementary Parent Presentation • Vernon Library • Wilmington Farmers Market • Para Los Niño's "DASH to Class" • Malabar Library • Camino Nuevo Charter "Reload" • Santa Monica Charter Presentation • Wilshire Branch Library • Central Library • Mar Vista Library • Vermont Square Library • Southeast LA Resource Fair • Echo Park Farmers Market • 5th Annual Bob Baker Day • CD - 9 Clean-Up Event • Westchester Farmers Market • Leimert Park Art Walk • Film Screening & Senior Resource Fair • Pico-Union Koreatown Library • Hollywood Library • Echo Park Library • CN Jane B Eisner Leadership Presentation • Studio City Library • Watts Library • Vida Sana Farmers Market • Movie Night "Avengers" Event • 	<ul style="list-style-type: none"> • Exposition Park Library • Maternal & Children Health Center • Junipero Serra Library • Town Hall Meeting DASH to Class • LGBT Center "Reload" • Central Farmers Market • Ketchum-Downtown YMCA Presentation • Pio Pico Koreatown Library • East LA Art Walk • Wilmington Library • Arroyo Seco Library • Highland Park Farmers Market • Washington Irving Library • Venice Library • Downtown Value School Presentation • City Hall East Farmers Market • Berendo MS Open House Night • Echo Park Farmers Market • Venice Farmers Market • New Village Girls "Reload" • Malabar Library • Homeboy Meeting • Eagle Rock Library • Westlake Farmers Market • Harry Bridge's Coffee with the Principal • Vermont Square Library • Central Library • Mar Vista Library • San Pedro Farmers Market • Alliance Margaret M. Bloomfield HS Presentation • Levitt LA Community Meeting • Vernon Library • LAUSD 5K and Health & Wellness Festival • CicLAvia South LA • Westchester Farmers Market • Leimert Park Art Walk • Woodland Hills Library • Northridge Library • East Hollywood Farmers Market • Hollywood Library • Echo Park Library • DASH to Class Outreach "El Sereno" • Studio City Library • Watts Library • Vida Sana Farmers Market • CAESS (California's Mental Health Cooperative Program) Event • Bob Baker Day 2020 • Westside Central - Older Adult Transportation Pop-Up • Ednovate's PMC Resource Fair • Young Men's Leadership Conference Event 	
March	<ul style="list-style-type: none"> • BofA Farmers Market 	<ul style="list-style-type: none"> • West LA Farmers Market 	<ul style="list-style-type: none"> • All Events "Canceled"

<ul style="list-style-type: none"> • Pio Pico Library • CicLAvia “Mar Vista & Palms” • Overland Ave Farmers Market • Maya Angelou Parent Workshop • Exposition Park Library • San Pedro Library • Junipero Serra Library • LAnow Field Outreach • LAnow Micro Transit Press Event • Central Farmers Market • Mar Vista Art Walk • Venice Farmers Market • Echo Park Farmers Market • New Village Girls “Reload” • Balance for Better “2nd Annual Health & Resource Fair” • Arbor Day CD-6 Celebration • Wilmington Library • Arroyo Seco Library • Harbor Community Clinic Women’s Health Fair • Highland Park Farmers Market • Washington Irving Library • WLCAC Youth Source Event • Venice-Abbot Kinney Library • LGBT Center “Reload” • City Hall East Farmers Market • Vernon Library • Northridge Library • Eagle Rock Library • Pico-Union Neighborhood Council Meeting • Wilmington Farmers Market • Maternal & Children Center • The Source at Exposition Park • Transit To Workday Event • The Valley Center Presentation • LADOT Health & Wellness Event • LA City Youth Council Presentation • Vermont Square Library • Mar Vista Library • Central Library • 11th Annual Community Resource Event • The Wellness Center 5th Anniversary Celebration • La Primera Tardeada Event • New Service Plan Outreach “DTLA” • Westchester Farmers Market • Hollywood Branch Library • Malabar Library • Echo Park Branch Library • The Beverly Center Presentation • Studio City Library • LAnow Outreach “Mar Vista” • Watts Library • Visa Sana Farmers Market • Movie Night Event 	<ul style="list-style-type: none"> • Pico-Union Worksource “Reload” • Pico-Union Library • Exposition Park Library • Maternal & Children Health Center • LGBT Center “Reload” • Junipero Serra Library • AVA Hollywood Outreach • Westlake Farmers Market • Central Farmers Market • DASH to Class Outreach “Panorama City” • Pio Pico Koreatown Library • BofA Farmers Market • Arbor Day LA 2020 Resource Fair • CD-1 & LAPD Resource Fair • Hoover Elementary School Health Fair 2020 • Mar Vista Art Walk • East LA Art Walk • Wilmington Library • Arroyo Seco Library • Washington Irving Library
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	<ul style="list-style-type: none"> • Hoover's 10th Annual Community Fair • Pico-Union Resource Fair • Leimert Park Art Walk 		
April	<ul style="list-style-type: none"> • New Service Plan Outreach "DTLA" • Exposition Park Library • Maternal & Children Center • Homeboy Meeting • Camino Nuevo Presentation • Central Farmers Market • LAnow & Cityride Presentation • New Village Girls "Reload" • BofA Farmers Market • The Help Group's 9th Annual Special Needs Resource Fair • Harbor Community Clinic Women's Health Fair • Highland Park Farmers Market • New Service Plans Press Event • Disney's Environmental Fair • LAnow Outreach "Palms Station" • New Service Plan Outreach • Echo Park Farmers Market • 5K Walk/Run Family Fun Event • Arroyo Vista Adult Health Fair • CD-11 Kids Earth Day • Smurf-Tastic Day Annual Health & Safety Fair • Earth Day Celebration/Green Expo 2019 • East LA Art Walk • Wilmington Farmers Market • Maternal & Children Health Center • San Fernando Valley Pop-up Event • LA Beautiful 2nd Annual Beautification Meeting • Dia del Nino - William Mead Health/Resource Fair • Spring Eggstravaganza Event • Expo Center Spring Festival 2019 • Avalon Gardens Easter Eggstravaganza Health Fair • Earth Day Event • South Park BID Meeting Presentation • Vida Sana Farmers Market • Echo Park Farmers Market • CD-6 Earth Day LA • Community Health & Wellness Fair • Soy Bilingüe Festival • Earth Day LA 2019 • CicLAvia Wilmington • Blumenfield Bike Ride • Leimert Park Art Walk • DR. Sammy Lee Medical & Health Fair/Open House Fair 	<ul style="list-style-type: none"> • All Events "Canceled" 	<ul style="list-style-type: none"> • All Events "Canceled"
May	<ul style="list-style-type: none"> • Outreach CE 439 • New Service Plan Outreach • Central Farmers Market • East LA Occupational Center Fair 	<ul style="list-style-type: none"> • All Events "Canceled" 	<ul style="list-style-type: none"> • All Events "Canceled"

	<ul style="list-style-type: none"> ● Gardena Pop-up Event ● BofA Farmers Market ● Cinco De Mayo Open House/Resource Fair ● Pio Pico Koreatown Library ● 2nd Family Fun Day Resource Event ● Overland Ave Farmers Market ● Exposition Park Library ● Maternal & Children Center ● San Pedro Library ● Junipero Serra Library ● Venice-Abbot Kinney Library ● New Village Girls "Reload" ● Venice Farmers Market ● Echo Park Farmers Market ● Summer Camp Orientation Event ● Miguel Contreras Resource Fair ● Los Feliz LAPL Ice Cream Book Sale Event ● Mother's Day Luncheon ● Wilmington Library ● Arroyo Seco Library ● Harbor Community Women's Health Fair ● Washington Irving Library ● Highland Park Farmers Market ● Equitas Academy #2 Presentation ● Equitas Academy #4 Presentation ● LGBT Center Meeting ● Wilshire Branch Library ● Equitas Academy #3 Presentation ● Equitas Academy #1 Presentation ● Bike to Work Week Fair ● Central Library ● Vermont Square Library ● Vernon Library ● 11th Annual Senior Job Fair ● 2nd Annual LA Beautification Conference/Resource Fair ● Pick Pico 2019 ● Woodland Hills Library ● 8th Annual Community Health & Resource Fair ● Studio City Library ● Watts Library ● Vida Sana Farmers Market ● Echo Park Farmers Market ● Westchester Farmers Market ● Hollywood Library ● Echo Park Library ● Raised on Records Pop-up Event ● Enchanted Forest Family Fun Night 		
June	<ul style="list-style-type: none"> ● Watts Health & Wellness Fair ● Overland Ave Farmers Market ● Vida Sana Farmers Market ● Exposition Park Library ● Maternal & Children Health Center ● San Pedro Library 	<ul style="list-style-type: none"> ● All Events "Canceled" 	<ul style="list-style-type: none"> ● All Events "Canceled"

	<ul style="list-style-type: none"> • Junipero Serra Library • LGBT Center “Reload” • Central Farmers Market • BofA Farmers Market • Pio Pico Koreatown Library • Lincoln Park Health & Awareness Fair • Mid-City Arts & Music Festival • Wilmington Library • Arroyo Seco Library • Harbor Community Clinic Women’s Health Fair • New Village Girls “Reload” • Washington Irving Library • Highland Park Farmers Market • Venice-Abbot Kinney Library • City Hall East Farmers Market • Venice Farmers Market • LAPD V’s LASD “Swing-A-Thon 2019” • Echo Park Farmers Market • Our Pride South LA CD-10 • Book to Action Event • Teen Membership Appreciation Day • 5th Annual CD-13 Senior Citizens Community Resource Fair • Central Library • Mar Vista Library • Vermont Square Library • Vernon Library • Community Picnic @ Moorpark Park Event • Safe Summer Kick-Off Resource Event • Westchester Farmers Market • 2019 Discover Marina del Rey • Annual Summer Japanese Festival • 2nd Annual Sonido Salvadoreño • LGBT Center “Reload” • Hollywood Library • Echo Park Library • Studio City Library • Watts Library • Independence Day Fiesta • CicLAvia Mid-City/Pico-Union • 10th Annual Concerts in the Park & Fireworks Show Event 		
July	<ul style="list-style-type: none"> • Pico-Union Work Source “Reload” • Exposition Park Library • Maternal & Children Health Center • San Pedro Library • Junipero Serra Library • 4th of July Fireworks CD-9 • Pio Pico Koreatown Library • BofA Farmers Market • Gusto Guatemalteco • Overland Ave Farmers Market • Arroyo Seco Library • Harbor Community Clinic Women’s Health Fair • Camino Nuevo Charter “Reload” 	<ul style="list-style-type: none"> • All Events “Canceled” 	<ul style="list-style-type: none"> • DASH Sylmar Outreach

	<ul style="list-style-type: none"> • Washington Irving Library • Highland Park Farmers Market • Venice-Abbot Kinney Library • LGBT Center "Reload" • New Village Girls "Reload" • Central Farmers Market • City Hall East Farmers Market • Venice Farmers Market • Echo Park Farmers Market • Mar Vista Art Walk • 39th Lotus Festival • Concert on the LA Waterfront • 2nd Annual Tamale Fest • Malabar Library • Wilshire Branch Library • Mar Vista Library • Vermont Square Library • Vernon Library • Health & Wellness Funfest 2019 • Back 2 School Health & Safety Fair • Glendale Cruise Night 2019 • Best of Koreatown Event • Pico-Union Library • Best of Downtown Event • Hollywood Library • Echo Park Library • Studio City Library • Watts Library • Vida Sana Farmers Market • 24th Annual Central Ave Jazz Festival • CD-1 Block Party Event • Westchester Farmers Market • Back to School Orientation • Press Event - Hollyhock House • 		
August	<ul style="list-style-type: none"> • LAnow Outreach • Central Farmers Market • Back to School Giveaway Event • BofA Farmers Market • Summer Movie Night "SING" • Summer Movie Night "SELENA" • Watts Learning Center Orientation • Back to School Health & Family Festival • Berendo Middle School Orientation • Carver Church Community Resource Fair • Peace & Unity in the Community • Community Clean Up/Resource Fair CD-1 • 21st Annual Taste of Ecuador Food Festival Event • Pico-Union Worksource • Exposition Park Library • Maternal & Children Health Center • New Village Girls "Reload" • National Night Out Movie Night "UP" • National Night Out- BBQ & Fun Event 	<ul style="list-style-type: none"> • All Events "Canceled" 	<ul style="list-style-type: none"> • DASH Sylmar Press Event • DASH Sylmar Outreach • New Village Girls

	<ul style="list-style-type: none"> ● National Night Out “Central Area” ● National Night Out Movie Night “T-Story 3” ● LGBT Center “Reload” ● Summer Movie Night “Lego Movie 2” ● Back to School BBQ Party Event ● Movie in the Park “UGLY DOLLS” ● Back to School Children’s Health Fair ● CCNP Back to School 2019 ● Back to School Driver Event ● Friday Fun Day ● Echo Park Farmers Market ● Venice Farmers Market ● Summer Movie Night “Hotel Transylvania 3” ● Back to School Fair 2019 ● Back to School Book Bag Giveaway ● Back to School Drive Fair ● Summer Movie Night “Incredibles 2” ● East LA Art Walk ● Mundo Maya Day ● Wilmington Library ● Arroyo Seco Library ● Harbor Community Clinic Women’s Health Fair ● DASH to Class Outreach “San Pedro” ● Washington Irving Library ● Highland Park Farmers Market ● Venice-Abbot Kinney Library ● DASH to Class Outreach “Pico-Union” ● Central Library ● Mar Vista Library ● Vermont Square Library ● Watts Learning Center Orientation ● Vernon Library ● Back 2 School Community Health ● Back to School Resource Fair ● CicLAvia Hollywood ● Mayor Ride-Along Event ● Wilmington Farmers Market ● Westlake Farmers Market ● Wilshire Branch Library ● Watts Library ● Vida Sana Farmers Market ● Echo Park Farmers Market ● Mar Vista Kids & Crafts Festival ● School Family Picnic Event ● Westchester Farmers Market ● Dia del Abuelo Club de Oro 2019 ● Leimert Park Art Walk ● DASH to Class “LACC” ● Woodland Hills Library ● Pico-Union Library ● DASH to Class “South LA” ● Hollywood Library ● Echo Park Library ● Studio City Library ● Camino Nuevo Back to School Event 		
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	<ul style="list-style-type: none"> • 5th Annual Pico-Union Block Party & Resource Fair • 		
September	<ul style="list-style-type: none"> • Maternal & Children Health Center • LGBT Center “Reload” • Junipero Serra Library • Westlake Farmers Market • DASH to Class “Panorama City” • LAnow Outreach “Palms” • Central Farmers Market • Back to School Night • Santee Education Complex Presentation • Coffee with the Principal • BofA Farmers Market • New Village Girls “Reload” • Berendo Middle School Presentation • Pio Pico Koreatown Library • Cypress Park Health Fair • 3rd Annual Harvard Park Community Celebration • Movie Night “Aladdin” • Hero Night “Incredibles 2” • East LA Art Walk • Pico-Union Library • Wilmington Farmers Market • Malabar Library • Downtown Value Middle School Presentation • Wilshire Branch Library • 18th Annual Senior Appreciation “Luncheon” • Central Library • Vermont Square Library • Mar Vista Library • DASH to Class “Koreatown” • Vernon Library • Coastal Cleanup Day Event • Vista Gardens/Del Rey Community Resource Fair • Westchester Farmers Market • Safety and Preparedness Fair • Pico-Union Library • Hollywood Library • Calahan Street Elementary Presentation • Ricardo Lizarraga Elementary Presentation • Studio City Library • David Starr Jordan HS Presentation • Watts Library • Vida Sana Farmers Market • Trinity Street Elementary Presentation • 2nd Annual Resource Fair • Echo Park Farmers Market • Van Nuys Arts Festival 2019 • 4th Annual Latina Conference in CD-9 • Congress of Neighborhoods 	<ul style="list-style-type: none"> • All Events “Canceled” 	<ul style="list-style-type: none"> • LGBT Center • Green Together Collaboration “Prende el Sol” • New Village Girls • Transformative Climate Communities Event

	<ul style="list-style-type: none"> ● 9th Annual Fall Literacy Community Book Festival ● Abbot Kinney Festival 2019 		
October	<ul style="list-style-type: none"> ● Maternal & Children Center ● Augustus F. Hawkins HS Presentation ● Miguel Contreras Presentation ● LGBT Center "Reload" ● Junipero Serra Library ● OTMRP Event Old Adult Transportation Expo ● Aerospace Corporation's Annual Commuter Fair ● Camino Nuevo Charter "Reload" ● Central Farmer Market ● UCLA Rideshare ● El Centro del Pueblo (GRYD) ● BofA Farmers Market ● Pio Pico Koreatown Library ● Calahan Street Elementary Presentation ● Gold Future 50=Senior Expo 2019 ● CicLAvia Heart of LA/Celebrating UCLA100 ● Pico-Union Worksource "Reload" ● New Village Girls "Reload" ● Exposition Park Library ● Highland Park Farmers Market ● Washington Irving Library ● New Heights Charter School Presentation ● Harbor Community Clinic Women's Health Fair ● LACC 14th Rideshare Event ● Venice-Abbot Kinney Library ● Westlake Farmers Market ● City Hall East Farmers Market ● LA County Public Works Rideshare Week Fair ● Ramon C. Cortines "Grand Arts" Presentation ● David Starr Jordan HS Presentation ● Echo Park Farmers Market ● Venice Farmers Market ● 2nd Annual Block Party & Resource Fair ● LACC: Community & Job Fair ● Cultiva LA Pumpkin Patch Event ● The GAS Company Tower - Rideshare Fair ● Benjamin Franklin HS Presentation ● Central Library ● DASH to Class Outreach "Reseda" ● Vermont Square Library ● Mar Vista Library ● Levitt LA CAC Meeting ● Movie Night "Aladdin" CD-1 ● Del Rey Day 2019 ● Downtown Value MS Presentation 	<ul style="list-style-type: none"> ● All Events "Canceled" 	<ul style="list-style-type: none"> ● UCLA Sustainable Transportation Fair ● New Village Girls

	<ul style="list-style-type: none"> • Susan Miller Dorsey Presentation • Westlake Farmers Market • Studio City Library • Cleveland Charter HS Presentation • LADWP Rideshare Fair • Los Angeles HS Presentation • Watts Library • Vida Sana Farmers Market • VA West Los Angeles Medical Center Stand Down 2019 • GRYD & CD-10 Block Party • 2nd Annual Drew St. Block/Resource Fair • Community Clean-Up & Resource Fair CD-1 • Marina Spooktacular • 1st Annual Area B Block Party • Dia de Los Muertos Community Procession/Resource Fair • Halloween Monster Bash Event • Halloween Carnival 		
November	<ul style="list-style-type: none"> • Reseda Elementary School Presentation • Camino Nuevo Charter "Reload" • 4th Annual dia de Los Muertos CD-15 • Dia de los Muertos Movie Night CD-6 • BofA Farmers Market • Panorama City HS Presentation • GIFT Special Needs Expo & Resource Fair • Dia de Los Muertos CD-11 • DASH to Class "Southeast" • Exposition Park Library • 2019 Benefits Open Season Fair • Maternal & Children Health Center • Junipero Serra Library • New Village Girls "Reload" • LGBT Center "Reload" • Central Farmers Market • San Fernando Valley Rescue Mission Presentation • DASH to Class "Vermont/Main" • Venice Farmers Market • Echo Park Farmers Market • 3rd Annual South LA Veterans Day • East LA Art Walk • Harbor Community Clinic Women's Health Fair • Washington Irving Library • Highland Park Farmers Market • Aspire Slauson Academy Coffee with the Principal • DASH to Class Outreach "Leimert/Slauson" • Venice-Abbot Kinney Library • Pierce College LA Transportation Fair • City Hall East Farmers Market • Ritter's Coffee with the Principal 	<ul style="list-style-type: none"> • All Events "Canceled" 	<ul style="list-style-type: none"> • New Village Girls

	<ul style="list-style-type: none"> • Vernon Library • Disabilities Resource Fair & Wheelchair Wash Event • Mini Resource Fair at Mi Centro • Free Information/Enrollment Resource Fair • Students Run LA Event • Thomas Riley HS Presentation • Watts Winter Wonderland Meeting • Malabar Library • DASH to Class Outreach “Studio City” • Wilshire Branch Library • Manual Art HS Presentation • Logan Middle School Presentation • Vermont Square Library • DASH to Class Outreach “Koreatown/Wilshire” • Trinity’s Coffee with the Principal • Fall Festival & Westlake Grand Opening Event • Westchester Farmers Market • Leimert Park Art Walk • 6th Annual - Vida Sana Faithsgiving Community Festival • DASH to Class Outreach “Hollywood/Beachwood” • Hollywood Library • Echo Park Library • DASH to Class Outreach “Lincoln Heights” • Studio City Library 		
December	<ul style="list-style-type: none"> • DASH to Class Outreach “Boyle Heights” • LGBT Center “Reload” • Pico-Union Worksource “Reload” • Exposition Park Library • New Open World Academy’s Presentation • Maternal & Children Health Center • Junipero Serra Library • DASH to Class Outreach “Highland Park” • Central Library • Weigands’s Coffee with the Principal • Raised on Records Pop-Up Event • James A. Foshay Learning Center Presentation • New Village Girls “Reload” • Eagle Rock Tree Lighting Ceremony Event • BofA Farmers Market • Winter Wonderland Family Festival CD-9 • Boyle Heights Winter Wonderland • Merry & Bright “Marina Lights” Event • 8th Annual Venice Holiday Sign Lighting • CicLAvia The Valley 	<ul style="list-style-type: none"> • All Events “Canceled” 	<ul style="list-style-type: none"> • New Village Girls

	<ul style="list-style-type: none"> ● Tarzana Snowflake Festival ● East LA Art Walk ● Assumption School Presentation ● Wilmington Library ● Arroyo Seco Library ● Jack London's School-Wide Event ● Bravo Medical Magnet's Coffee with the Principal ● Harbor Community Clinic Women's Health Fair ● LAnow & Cityride Day ● Burbank Blvd Elementary School Presentation ● Downtown Value "Reload" ● West Adams Coffee with the Principal ● City Hall East Farmers Market ● Watts Winter Wonderland Event ● Venice Farmers Market ● Ulysses Grant's Coffee with the Principal ● Pizza with Santa Event ● Echo Park Farmers Market ● Breakfast with Santa Event ● Community Resource & Holiday Fair ● Snow Wonder CD-11 ● Tree Lighting Ceremony & Winter Jubilee ● Woodland Hills Library ● Northridge Library ● Eagle Rock Library ● DASH to Class Outreach "Chesterfield" ● Community Posada Event ● Avalon Bay Meeting ● Studio City Library ● Wilshire Library ● Central Library ● Mar Vista Library ● Vermont Square Library ● San Pedro Farmers Market ● Winter Wonderland - Miracles on 88th Street Event ● Beach Wonderland Event ● Christmas Lunch, Gift Exchanges & Group Photo Event ● Westchester Farmers Market ● Echo Park Library ● Hollywood Library ● Watts Library ● Leimert Park Art Walk 		
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3. 2020 OUTREACH HIGHLIGHTS

LADOT Transit continued outreach activities until March 4, 2020, when California Governor Gavin Newsom declared California to be in a State of Emergency. Outreach activities from that date were canceled in response to Shelter in Place orders from the State as well as local governments. LADOT Transit did continue to provide Customer Services to riders and the public.

4. 2021 OUTREACH HIGHLIGHTS

LADOT Transit did resume a limited number of outreach activities in July 2021 as the level of Covid-19 transmission subsided. Through the remainder of the year, only a limited number of events were attended. Those events that were attended were prioritized based upon recommendations from City Council or Mayor's Office requests.

Project Specific Public Engagement

1. TRANSIT SERVICE ANALYSIS CONTINUED SERVICE EXPANSION

LADOT Transit began a major reevaluation of all its fixed-route and on-demand transit services in 2015. This multi-year project, called the *Transit Service Analysis*, was conducted in compliance with FTA Circular 4702.1B and 49CFR Section 21.9 (b) with the goal of objectively assessing the performance of all LADOT Transit services. The detailed analysis identified which service design and delivery practices resulted in the most effective and efficient services, as measured by ridership and revenue.

2. LAnow SERVICE EQUITY ANALYSIS

In 2017, LADOT Transit proposed a microtransit pilot for areas underserved by the department's fixed-route services. The city's Westside was chosen for the first pilot, specifically the Palms, Mar Vista, Del Rey and Venice communities that could be served with smaller load vehicles using on-demand technology, which would connect passengers with Metro Regional Rail service at the Palms Station. All areas to be served by the pilot are densely populated with significant Latino/Hispanic, Asian, and African American populations. The LAnow Pilot Program began in March 2019.

In June 2020, LADOT Transit conducted a Service Equity Analysis of LAnow service which identified that just under half or 49.7% of the service area population identified themselves as minorities and that 12.2% of the service area population lives below the poverty line.⁶

The Service Equity Analysis identified that LAnow service is a more convenient option for riders who need and want to travel within the demonstration area. As an example, a connecting Metro bus from the Palms Rail Station to Venice would take more than 60 minutes while the LAnow service averages half that amount of time. LAnow is also competitively priced at \$1.50 a ride compared to a one-way fare on Metro service of \$1.75, or a taxi trip which is \$2.85 just at the flag drop, or a ride-hailing service with a minimum fare of \$3.50.

According to the analysis, LAnow offered a more convenient and less expensive travel option to minority and low-income populations because of the following:

⁶ Los Angeles City Planning Data 2020/American Community Survey 2017

1. LAnow service offers convenient on-demand travel for any rider within the demonstration area;
2. LAnow's cost per trip is lower than other travel options in the area;
3. Offering options to call or access the service at major stops responds to the needs of those riders who may not have smartphone, sufficient telephone data plans or internet access;
4. Focused outreach efforts to minority and low-income populations will ensure equal access to LAnow service.

Minority and low-income populations in the LAnow service area stand to benefit significantly and equally from having a travel option that provides greater cost and time savings.

3. DASH TO CLASS FARE EQUITY ANALYSIS

In August 2019, LADOT Transit began a demonstration of providing free rides for all students enrolled in classes from Kindergarten to Grade Level 12 in public, vocational and parochial schools, and colleges on its network of Community DASH routes. Called DASH to Class, the program was supported by outreach efforts to multiple Los Angeles Unified School District (LAUSD), select private, vocational, and parochial schools, colleges, and universities.

In order to access the free ride program, students were required to apply for and obtain a Student Reduced Fare Transit Access Program-TAP smart card. The Los Angeles County Metropolitan Transportation Authority (Metro) administers all reduced fare programs that are available on the Los Angeles Region's TAP smart card fare payment system including the Student TAP card. Metro assesses student eligibility for the program and issues the TAP card to the eligible student.

The DASH to Class pilot was funded by a grant from the State of California's Climate Investments Low Carbon Transit Operations Program (LCTOP), one of several programs that are part of the Transit, Affordable Housing, and Sustainable Communities Program established by the California Legislature in 2014. LCTOP was created to provide operating and capital assistance for transit agencies to reduce greenhouse gas emission and improve mobility, with a priority on serving disadvantaged communities. LADOT Transit used grant funding to underwrite the loss of revenue resulting from offering free fares to students.

LADOT Transit conducted a Fare Equity Analysis of DASH to Class in accordance with the FTA's Title VI requirements. LADOT Transit's Onboard Survey's documented that 84% of its total student ridership identified themselves as minorities and that 54% of DASH student riders came from low-income households.⁷ The equity analysis determined that student boardings more than tripled during the analysis period from 49,967 to 219,484. The analysis determined that there was not a disparate impact nor a disproportionate burden on minority or low-income populations.

DASH to Class has been replaced by a free fare program for all students enrolled in public, private and vocational schools, and colleges.

⁷ LADOT Transit On-Board Customer Satisfaction Survey 2016

Public Input & Review

A major service or fare change will be subject to public hearings and adoption by the Los Angeles City Council. Public input will be actively sought with regard to the proposed changes prior to public hearings. Customers, stakeholders and the general public will be invited to provide comments through one or more of the following methods: LADOT Transit website, public meetings and hearings, newspaper advertising, on-board advertising, email distribution, direct rider surveys, and various social media.

During the pandemic, public hearings were held virtually in accordance with Governor Newsom's Executive Order N-29-20 (March 17, 2020):

- July 14, 2021, Noon to 1pm, DASH to Class – Proposed Fare Change Public Hearing
- July 14, 2021, 1-2pm, LAnow – Proposed Service Change Public Hearing

In addition to its usual methods of advertising the hearings, LADOT Transit performed outreach by telephone to ensure riders and other stakeholders were aware of the public hearings and could participate.

Public Notification

When required, the public comment process will begin with publishing a legal notice at least seven calendar days in advance of the public hearing dates and locations in local newspapers of general circulation, including ethnic language newspapers in compliance with LADOT Transit's LEP Plan. The notice will set specific places, dates and times for the public hearings. Written comments will also be accepted on the proposed changes. Legal notices will inform the public of the proposed actions that initiated the public comment process. News releases will also be prepared and sent to the local media as appropriate.

In addition to the public hearing process, LADOT Transit employs various outreach methods including:

- Publication on website (ladottransit.com)
- Information posted on buses
- Rider Alerts distributed on buses and through direct emails
- Notices to public officials, key stakeholders and community groups
- Targeted surveys of riders
- Social media such as Twitter and Facebook
- Ambassador personnel stationed at key bus stops to discuss service or fare changes with riders

Protocol for Public Hearings

Public hearings will be scheduled and conducted by LADOT Transit staff at times, dates and places throughout the City of Los Angeles representative of the service levels provided by LADOT; all

must be accessible by transit and to those with disabilities. Translation services will be provided as needed for LEP communities, and literature will be provided in translated form as appropriate for that particular area of the City based upon its census profile.

Sign-in sheets will be provided, and each attendee asked to register his or her name and contact information. The hearing will begin with a recitation by the hearing officer of the purpose of the hearing under Title VI and the proposed action. Attendees will be invited to make comments or submit comments in writing. The Hearing Officer will determine the amount of time each speaker has to comment. After all attendees have had an opportunity to comment, the Hearing Officer will close the hearing.

During the pandemic, LADOT Transit staged all of its public hearings online in compliance with Governor Newsom's Executive Order N-29-20 (March 17, 2020). The public was notified of online procedures and protocols well in advance of the two public hearings staged during this reporting period. Both hearings were attended by members of the public who were able to engage LADOT Transit Staff in question and comment periods following the formal public hearing presentations.

Documentation of Public Hearings

Official records of public hearings on service or fare adjustments will be provided by:

- Affidavits of newspaper publications of public notices
- News releases conveying information on upcoming public hearings
- Audio or video recordings and transcripts of proceedings

Addressing Public Comments

All relevant comments received at public hearings or in writing at public hearings, or otherwise received directly from the public and public officials during the study period, will be entered into the public record of the comment process. Subsequently, staff will evaluate and analyze all relevant comments received and prepare a written report with recommendations for the City of Los Angeles Board of Transportation Commissioners and Los Angeles City Council.

Language Assistance Plan

LADOT Transit is committed to ensuring meaningful access for persons with LEP to its services and programs, and to participate in policy and service decisions. LADOT Transit developed its first LEP Plan in 2012 identifying significant LEP populations within the LADOT Transit service area.

Since the development of the LADOT Transit LEP Plan, every effort has been made to provide LEP populations with ready access to LADOT Transit information and its services. Route and schedule information is available in more than one-dozen languages identified in the LEP Plan; specific outreach materials are developed and distributed in LEP languages; newspaper advertising in these languages is posted in foreign language newspapers published in Los Angeles and distributed among targeted populations.

LADOT Transit last updated its LEP Plan with the results of its 2016 onboard survey data. Onboard surveys were scheduled to be conducted in 2020, but due to the pandemic are now scheduled for early 2022. The LEP Plan will be fully updated following the conclusion of its onboard surveys.

LADOT Transit actively assesses its LEP efforts through the review of its outreach efforts, rider comments, and by using LEP.gov Language Map App as a quick reference tool. LADOT Transit's current LEP Plan is included as **Appendix 3**.

LADOT Transit continues to provide language services via its Customer Service Center and Outreach personnel, website, phone, and printed materials as discussed here.

Updated Four-Factor Analysis

In accordance with FTA's policy guidance, LADOT Transit conducts a Four Factor Analysis to inform how it provides meaningful access to services for LEP persons and how it maintains an effective LEP program. The four factors used for this analysis are:

- 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.*
- 2. The frequency with which LEP persons come into contact with the program.*
- 3. The nature and importance of the program, activity, or service provided by the program to people's lives.*
- 4. The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.*

Determining the presence of LEP populations in the LADOT Transit service district area was done through an analysis of the following data sources:

- LEP.gov Language Map App
- American Community Service 2011 to 2015 5-year estimates
- LADOT 2016 Onboard Survey Data
- Maps showing LADOT Transit service areas with concentrations of LEP individuals (US Census Bureau, 2000 Census data by zip codes)
- Information gathered through discussion with members of community organizations serving LEP constituents
- Driver and other frontline personnel contact with LEP persons
- LADOT Customer Service Center and Outreach contact with LEP persons

This updated Four-Factor Analysis will guide LADOT Transit efforts to retain successful program and activities designed to meet the language needs of LEP populations. It will also identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to LADOT Transit programs and services. The complete analysis is located in the LEP Plan.

LADOT Transit's website, ladottransit.com, will provide transit information in ten languages identified in the agency's updated LEP Plan:

Armenian – Chinese – Japanese – Korean - Russian
Spanish – Tagalog – Thai – Vietnamese - Persian

In addition to these ten languages, LADOT Transit leverages Google Translate that allows voice input for translation in 23 languages and simple translations in more than 50 languages. All LEP customers can access language assistance by calling the LADOT Customer Service Center at 808-2273 from the 213, 310, 323 and 818 area codes.

LADOT Transit's multilingual web pages were also updated to include Title VI Civil Rights notification and complaint procedures as approved by the FTA.

The agency's LEP Plan has been used in the marketing of the agency's services to ensure that LEP populations receive messages about LADOT Transit services and programs. The LEP requirements are also considered in all outreach and community-based activities.

Customer Service: A Program Foundation

LADOT Transit's Customer Service Center fields walk-in, telephone, email, and mail inquiries and comments from riders and the public weekly. On an annual basis, the Customer Service Center serves an average of 5,000 walk-in customers and fields 70,000 calls. The LADOT Transit website, ladottransit.com, accepts comments and suggestions from the public with an annual average of 6,000 comments received through this portal. Every commendation, complaint, and suggestion receives a response.

Non-elected Commissions and Boards Membership and Recruitment

LADOT Transit receives oversight, guidance and policy direction from the City of Los Angeles Board of Transportation Commissioners. The Board of Transportation Commissioners is comprised of volunteers who are nominated by the Mayor of the City of Los Angeles and confirmed by the Los Angeles City Council. The Board of Transportation Commissioners has duties and responsibilities delineated by the Los Angeles Administrative Code including oversight of the fares charged by LADOT Transit.

Cityride, LADOT Transit's voluntary accessible transportation service program for eligible seniors and the disabled, comes under the regulation of the City of Los Angeles Taxicab Commissioners because a significant portion of Cityride services are provided by taxi cabs operated by the city's five franchise taxi companies. The Taxicab Commissioners assess LADOT Transit's recommendations regarding the taxi service that is an option for Cityride program participants.

The Los Angeles City Council approves the service types and levels operated by LADOT Transit as well as the department's use of Proposition A and Proposition C revenues that provide the majority of funding for Commuter Express, DASH and Cityride services. The Los Angeles City Council is an elected body.

The membership of both the Board of Transportation Commissioners and the Taxicab Commissioners are presented below:

Board of Transportation Commissioners

Hispanic/ Latina	White/ Caucasian	Black/African American	Asian/ Pacific Islander	Other
1	3	1	2	0

Board of Taxicab Commissioners

Hispanic/ Latina	White/ Caucasian	Black/African American	Asian/ Pacific Islander	Other
1	2	0	1	0

Subrecipient Monitoring

LADOT does not have sub-recipients and as such does not have Title VI monitoring procedures for subrecipients.

Constructed Facilities

LADOT Transit did not construct any facilities during the period of this Title VI Program update.

Documentation of Governing Body Review and Approval

The Los Angeles City Council is the body that approves LADOT Transit's Title VI Programs. The City Council allows LADOT Transit and its designees to execute and file administrative paperwork on behalf of the City of Los Angeles with the FTA including annual certifications of assurances including Title VI per the Council's Motion 18-1036 previously referenced in this Title VI Program and included as **Attachment B**.

PART II - FIXED ROUTE TRANSIT PROVIDERS REQUIREMENTS

System-Wide Service Standards and Policies; Service Monitoring

Service Design

LADOT Transit fixed-route services are grouped into two service categories for the purposes of establishing service design standards. The majority of these services are the DASH community circulator routes, which operate on fixed routes with set schedules making frequent local stops. LADOT Transit also operates 14 Commuter Express routes, primarily during weekday peak periods, although several routes operate throughout the entire day. Commuter Express routes have limited stops and utilize freeways to transport workday commuters between residential areas and employment centers.

Commuter Express and DASH services have different service standards and expectations based upon the demographic profiles of the markets that are served and the operating protocols required to deliver the services as described below.

Service Category	Network Role	Bus Routes
DASH	Provides low-cost fixed route circulator bus service to activity centers within communities as well as to regional transit hubs.	5 DASH Downtown and 26 Community DASH routes throughout the city.
Commuter Express	Provides express transit service during peak periods between residential areas and employment centers.	Commuter Express 142, 409, 419, 422, 423, 431, 437, 438, 448, 534, 549, 573, 574, Union Station/Bunker Hill Shuttle

LADOT Transit's *LANow* service is a new on-demand service that was operated as a demonstration and then became a permanent service after its demonstration period. Services standards have not yet been developed for this new service. Cityride provides essential van and taxi services to seniors and persons with disabilities and as such the service does not have standards for its operation.

Service Monitoring

LADOT Transit regularly monitors its Commuter Express, DASH, *LANow* and Cityride services in compliance with the FTA's Title VI requirements that "no person or group of persons shall be discriminated against with regard to the routing, scheduling or quality of transportation service furnished as part of the projects in the basis of race, color or national origin."

LADOT Transit monitors its services using the FTA-required service performance metrics including defining minority and non-minority routes; span of service; frequency of service; on-time

performance; passenger/vehicle loads; service availability; bus stop amenities and vehicle assignments.

LADOT Transit uses the FTA minority transit route definition to implement this monitoring program. A minority transit route is one in which at least one-third of the revenue miles are located in a Census block or Census block group where the minority population percentage exceeds average minority population in LADOT Transit's service area. This analysis is supplemented with data from LADOT Transit's onboard surveys to adjust routes as needed.

The methods for evaluating service performance are as follows:

- Analysis of ridership data from automated passenger counting equipment, fare revenue and manual ridership counts
- Service contractor observation and analysis
- LADOT project manager field observations
- Complaints and compliments received from riders
- LADOT Transit's Onboard Surveys

Additionally, LADOT prepares Transit Service Analyses approximately every five years, similar to the Transit Service Analysis completed in 2017, that assess the performance of all Commuter Express and DASH routes, rank the services for evaluation using established performance metrics, while identifying new service opportunities and unmet needs. The 2017 Transit Service Analysis is included as **Appendix 5**.

LADOT Transit applies its Disparate Impact Policy and its Disproportionate Burden Policy to the results of its performance evaluations and fare recommendations to determine if disparate or disproportionate impacts exists as a result of prior actions. LADOT Transit will take steps to remedy any potential disparity where the evaluated service fails to meet established service standards or policies.

The results of the evaluation program will be submitted to the Los Angeles City Council and the FTA as part of the triennial Title VI Program submittal.

Service Standards and Policies

The FTA requires that all fixed-route transit providers develop service standards and policies to provide a context for the monitoring and assessment of transit service. These standards and policies are used to compare the services provided to minorities with the services provided to non-minorities. Service standards and policies include:

- Service Standards
 - Vehicle Load
 - Vehicle Headway
 - On-Time Performance

- Service Accessibility
- Service Policies
 - Vehicle Assignments
 - Distribution of Transit Amenities

Vehicle Loads

Vehicle load is the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. For example, on a 40-seat bus, a vehicle load of 1.5 or 150% means all seats are filled and there are 20 standees.

LADOT Transit has established standards to determine if a bus is overcrowded. These standards are based upon average maximum number of passengers seated and or standing during a peak period trip. Peak periods are defined as 6am to 9am and 4pm to 7pm on a weekday. Maximum load factors are representative of the LADOT Transit Fleet Size, the available fleet to operate service, and ridership activity (demand) with the latter being monitored on a regular basis using automated passenger counting tallies, fare payment totals, and manual ridership counts.

Vehicle overcrowding is dependent upon ridership activity and the seating capacity of each vehicle assigned to the route. LADOT operates two types of vehicles in its fleet. DASH uses 29- to 35-foot heavy-duty, low-floor transit buses that allow for frequent on's and off's carrying heavy passenger loads. Commuter Express service uses 40- to 45-foot over-the-road motor coaches suitable for long distance commutes primarily on freeways at higher speeds. To account for the difference in seating, the vehicle load will be measured as an average from the maximum load point as determined by automated passenger counting data.

LADOT Transit monitors vehicle loads on all its services using data from its automated passenger counting units, fare revenues and service contractor observations. That analysis is done to the stop level for each Commuter Express and DASH route and is informed by census tract and onboard survey data that identifies routes with low income, minority and LEP populations.

Vehicle Load Standard

Service Category	Maximum Load Standard
DASH	100% + 10 to 15 standees
Commuter Express	100% + 6 to 8 standees

Vehicle load standards are consistent for peak and off-peak periods. The maximum number of standees varies depending on vehicle capacity. For DASH, maximum of 10 standees on 29-foot and 30-foot buses and 15 standees on 35-foot buses. For Commuter Express, maximum of 6 standees on 40-foot motor coaches and 8 standees on 45-foot motor coaches.

Vehicle Load Monitoring

LADOT Transit monitors vehicle loads on all its services using data from its automated passenger counting units, fare revenues, rider complaints and project manager/service contractor

observations. That analysis is done monthly to the stop level for each Commuter Express and DASH route and is informed by census tract and onboard survey data that identifies routes with low income, minority and LEP populations.

Vehicle Headway

Vehicle headway is defined as the amount of scheduled time between two vehicles traveling in the same direction on the same route.

Vehicle headways determine how long riders must wait for bus service. Higher frequencies result in reduced wait times, which make the service more attractive to potential riders. Frequent service, which enables riders to use the service spontaneously without consulting a bus schedule, is defined as 15-minute headways or shorter.

Vehicle Headway Standards

Service Category	Maximum Headway Standard
DASH	20 minutes
Commuter Express	Per trip basis

Commuter Express service is scheduled to ridership demand, being heavily peaked and may have variable headways as a result.

Vehicle Headway Monitoring

Vehicle headways are monitored monthly using the automated vehicle locator system, Project Manager/ Service Contractor observations and rider complaints. Service headways are calibrated to the requirements of each service. DASH has short headways required by how the service operates and Commuter Express headways are correlated to the length of the route, travel time and the requirements of riders, as determined by LADOT Transit's onboard surveys.

On Time Performance

On-time performance is a measure of service reliability that determines the percentage of buses that arrive or depart within a certain amount of time before or after the published schedule. On-time performance reflects the quality of service and influences a rider's choice to use transit. LADOT Transit has established measures and standards for on-time performance of its Commuter Express and DASH services and monitors the performance of these services to those standards.

LADOT Transit's on-time performance objective is 85 percent or greater for all its services. LADOT Transit continuously monitors for on-time performance and system results are included as part of monthly performance reports covering all aspects of operations. Measurement is calculated in several ways, but first and foremost is the data from the Syncromatics, the agency's automated vehicle locator system. Other measures of service reliability are visual measurements taken by the agency's service contractors, LADOT Transit Project Managers, and complaints received from riders by the LADOT Transit Customer Service Center.

On-Time Performance Standards

Service Category	On-Time Performance Standard
DASH	85%
Commuter Express	85%

85% is a common industry standard that allows for some level of service variability while maintaining a reasonable expectation of reliability for riders. LADOT Transit believes that 85% is a realistic standard in its service area based upon traffic levels, which are the greatest barrier to achieving a higher standard.

On-Time Performance Monitoring

On-time performance is monitored monthly by LADOT Transit's Automated Vehicle Locator System, rider complaints, the observations of Project Managers and the Service Contractors. A monthly report of on time performance is compiled for review the LADOT Transit Senior Management.

Among the corrective actions that LADOT Transit takes to correct on time performance problems are the following:

- Adjusted times between time points to make the schedule more feasible.
- Reduce/minimize early trips
- Monitor poor driver performance and retrain if necessary
- Move virtual stop locations to prevent false early/late arrivals
- Adjust interlining between buses to make second trips on time
- Utilize incentive programs
- Imposed penalties on contractor for late trips

Analysis of On-Time Performance problems is performed using data from previous Title VI Programs and other service analyses that identify minority and low-income census tracts. When communications to riders are warranted by the corrective actions, areas with significant populations with LEP are identified and materials are disseminated to inform these populations of LADOT Transit's efforts to improve service performance.

Service Availability

LADOT Transit strives to offer convenient access to its services for all those who live and work in, and visit the City of Los Angeles, especially minority and low-income populations. The City of Los Angeles is the most densely populated urban area in the United States, according to the 2010 US Census, with 6,999 resident per square mile. Accordingly, a significant portion of the population resides within walking distance of Community DASH services while Commuter Express services can be accessed by walking, using active transportation, using park and ride lots or regional transit hubs.

Service Availability Monitoring

According to LADOT Transit's Transit Service Analysis conducted in February 2017, the percentage of minority and low-income populations with service available exceeds that of non-minority populations for DASH service. Non-minority populations are more frequent along Commuter Express routes; however, the actual ridership of these routes has a high concentration of minorities (60% according to the most recent LADOT Transit Onboard Survey completed in 2016).

Vehicle Assignment

LADOT Transit contracts with private service providers for the provision of all of its services. LADOT Transit supplies the rolling stock to its contractors for the operation of its services. LADOT Transit requires its service providers to assign vehicles based upon route ridership, operating conditions and the route profiles of Commuter Express and DASH services.

LADOT Transit has standardized its fleet to two primary types of buses: 29 to 35-foot heavy duty transit buses for DASH neighborhood circulator services and 40 to 45-foot over-the-road coaches for Commuter Express. LADOT Transit's Cityride voluntary transportation service for the disabled and seniors utilizes 22-foot cutaway vehicles.

Commuter Express vehicles are fueled by CNG; DASH vehicles are electric or fueled by propane or CNG; Cityride vehicles are fueled by gasoline. The average age of the Commuter Express and DASH fleets is less 6 to 10 years old. Buses are scheduled for replacement when they reach 12 years of age. New vehicles are distributed equitably throughout the fleet based on the retirement schedule, ridership and route profiles.

LADOT Transit's Fleet Management Planning results in an equitable assignment of vehicles throughout LADOT Transit's service contract packages/regions, through the standardization of the fleets, the equalization of vehicular miles, ridership and analyzing the profile of routes to determine the demographic profile of ridership.

The private contractors provide a vehicle maintenance facility and yard for each LADOT Transit service contract package or region. LADOT's vehicles are distributed among the regional yards on the basis of services operated from the facility, the route assignments and the route profile. Vehicles are assigned and inter-changed among routes operating from a specific facility.

Vehicle Assignment Monitoring

LADOT Transit operates a majority of Minority Transit Routes, 29 by census tract but 34 by Onboard Survey results and just seven Non-Minority Transit Routes⁸, and vehicle age is comparable across these routes. A Minority Transit Route is defined as having at least one-third of its total route mileage in Minority Census Tracts, which are defined as those with a minority population percentage greater than 68.2%. Of LADOT's 41 fixed route transit lines, 29 (70%) qualify as Minority Transit Routes. These include all five (5) DASH Downtown routes, 22 of 26 Community DASH routes, and seven of the 14 Commuter Express routes. As mentioned

⁸LADOT Transit's 2012 Title VI Program & Assessment and LADOT Transit's 2017 Transit Service Analysis

previously in this program report, the majority of the riders of both Commuter Express and DASH services are minorities according to the 2016 LADOT Transit Onboard Surveys. The Onboard Surveys since 1992 have defined all Community DASH and Downtown DASH routes as having a majority of their riders identify themselves as being minorities and seven of the 14 Commuter Express routes have a majority of minority riders.

The table below shows:

- LADOT Transit fixed-route services provided in each region
- Minority Transit Routes by region using the FTA-defined census tract data profile
- Number and type of vehicles assigned to each region
- Average age range of vehicles by type in each region
- Average age range of all vehicles by type in the system fleet

Service Region	Transit Services	Minority Transit Route?	Vehicles	Average Age (Region)	Average Age (System)
South	Commuter Express: 142 431 437 438 448 534 Metrolink Shuttle	Yes Yes Yes Yes Yes Yes ---	50 @ 40'-45' motor coach	6-10 years	6-10 years
	Community DASH: Chesterfield Square San Pedro Vermont/Main Watts Wilmington	Yes Yes Yes Yes Yes	45 @ 29'-32' bus	6-10 years	6-10 years
Central	Community DASH: Boyle Heights El Sereno/City Terrace Pico Union/Echo Park	Yes Yes Yes	31 @ 30' bus	6-10 years	6-10 years
North	Commuter Express: 409 419 422 423 549 573 574	No Yes No No No No No	68 @ 40'-45' motor coach	6-10 years	6-10 years
	Community DASH: Northridge	Yes	23 @ 29'-32' bus	6-10 years	

	Panorama City/Van Nuys Van Nuys/Studio City	Yes No			6-10 years
Downtown DASH & Mid-City	DASH Downtown A, B, D, E & F Community DASH: King-East Southeast Pueblo Del Rio Leimert/Slauson Crenshaw Midtown Fairfax Highland Park/Eagle Rock, Hollywood Beachwood Canyon Hollywood/Wilshire Lincoln Heights/Chinatown Los Feliz Observatory Shuttle Wilshire Center/Koreatown	Yes Yes Yes Yes Yes No Yes Yes No Yes Yes No No Yes Yes	63 @ 29'-35' bus 62 @ 29'-35' bus	0-5 years 6-10 years	6-10 years 6-10 years
Cityride	Service-area/City-wide	Yes	44 @ 20'-25' bus	6-10 years	6-10 years
LANow	Westside-Palms, Mar Vista, Del Ray and Venice	Yes	8 @ 20'-25' bus	0-5 years	6-10 years

Vehicles are assigned to each service region based on the services operated out of the facility and the operational needs. New vehicles are deployed on schedule to replace vehicles that are 12 years or older. LADOT Transit's Fleet Management Plan assigns vehicles according to the service types and levels of service operated from a specific yard to address service equity requirements.

Amenity Placement Guidelines

LADOT Transit has guidelines that form a framework for the deployment of amenities as part of its projects and programs. The following sections summarize the major policy documents that govern the deployment of amenities across the LADOT Transit service network.

The use of the term amenities is limited to the Title VI definition for the purposes of this document. This section includes a summary of customer information deployment policy. It should also be noted that project development often requires considerations not accounted for in these written policies.

Bus Stop Guidelines

LADOT Transit bus stops are easily identifiable, safe, accessible and a comfortable place to wait for the bus. LADOT Transit's guidelines call for uniform placement of signs and amenities so that the public has become familiar with the information displayed and the LADOT Transit brand to

readily identify LADOT Transit services from those of other municipal and regional transit service providers.

Bus Shelter Placement

LADOT Transit does not control the placement of bus stop shelters. That responsibility is vested with another City of Los Angeles Department Bureau of Street Services (StreetsLA). StreetsLA controls a combined contract with Outfront and JC Decaux, two outdoor advertising firms. LADOT Transit works closely with the Bureau of Street Services to accommodate shelter requests and to influence the placement of shelters.

Bus Bench Placement

StreetsLA also controls the placement of bus benches throughout the City of Los Angeles, with InSite Media a contractor that places advertising on the benches. LADOT Transit works with StreetsLA to recommend locations for benches based upon requests from riders and the public received at the LADOT Transit Customer Service Center.

Bus Stop Information

All Commuter Express and DASH services are signed with LADOT Transit-branded bus stop signs that include the route name and or number; the corresponding stop number for riders to access “next bus” information from their cell phones or wireless devices, and, at high density stops, information about transferring and wayfinding.

LADOT Transit Bus Stops include information that can link a rider to the LA Bus Application. The rider can dial a number using a smartphone into the LA Bus application and receive real time information on the arrival time for the next bus at that specific bus stop sign.

All bus stop signs, and information are kept current through a perpetual inventory of the sign location; the corresponding routes servicing that location; the type and number of signs; the stop number for “next bus” information; and the presence of related information at the location.

Distribution of Amenities

The City of Los Angeles is a minority-majority city, so the distribution of amenities is equitable across low-income and minority populations by reason of the population. As a result, there is no disparate impact on minority populations or a disproportionate burden on low-income populations from the levels and types of amenities provided to either.

In the development of new amenities, LADOT Transit collaborates with StreetsLA to ensure that LEP, low-income, and minority populations receive appropriate levels and types of amenities. StreetsLA's placement criteria for amenities is based upon Metro and LADOT Transit ridership data. Requests for amenities that are received by the LADOT Transit Customer Service Center are evaluated using census tract, Onboard Survey and route performance data and provided to StreetsLA for its evaluation.

Customer Information

LADOT Transit's primary source of providing customer information to the public is through the LADOT Customer Service Center. The Center serves customers by four methods:

1. Online: The Center manages most of LADOT Transit's online and social media communications
2. Telephone: The Center handles all customer information calls not handled through the agency's website. The Center answers more than 70,000 requests for information a year.
3. Direct Contact/Walk-In: The Center is located in the heart of Downtown Los Angeles, next to City Hall, and serves an average of 5,000 walk-in customers each year, many of whom have special language needs.
4. Outreach: The Center staff, the majority of whom are bilingual, has primary responsibility for LADOT Transit's outreach and engagement efforts, especially to low-income and minority populations.

The location of the Customer Service Center makes it accessible to all targeted populations as the location is well served by public transit. LADOT Transit's customer information is also tailored to the needs of Commuter Express and DASH riders as identified in the numerous onboard surveys conducted over the past two decades. The needs of low-income, minority, and LEP riders are also met through user information in multiple languages and through the extensive outreach efforts of LADOT Transit as documented earlier in this plan update.

Demographic Analysis

LADOT Transit uses demographic data to assess equity in distribution of its services, facilities, and amenities in relation to minority, low-income, and LEP populations. This is data that informs LADOT Transit in the early stages of service, facility, and program planning enabling LADOT Transit to monitor ongoing service performance, analyze the impacts of policies and programs on targeted populations, and to take appropriate measures to avoid or mitigate potential disparities.

LADOT Transit performs this analysis with ridership, market research and population data within the service area. The demographic data shown in this report is from the following sources:

- 2010 US Census Bureau Data
- 2015 American Community Survey 5-Year Estimates
- 2012-2016 LADOT Transit On-board Survey Results
- 2012-2018 LADOT Transit Operating Data

Ridership Demographics

LADOT Transit has provided its most recent ridership demographic profile in its DASH to Class Fare Equity Analysis and LAnow Service Equity Analysis.

PART III: TITLE VI SERVICE AND FARE EQUITY POLICIES

The Los Angeles City Council has approved the following policies:

1. Major Service Change Policy
2. Disparate Impact Policy
3. Disproportionate Burden Policy

Service and Fare Equity Policies

In accordance with FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," effective October 1, 2012, transit providers operating 50 or more fixed route vehicles during peak service and serving a population of 200,000 or greater must evaluate, prior to implementing, any and all proposed changes that exceed the transit provider's major service change threshold to determine whether those changes will have a discriminatory impact on minorities and low-income persons.

To comply with this requirement, LADOT Transit adopted the following three policies:

- Major Service Change Policy
- Disparate Impact Policy
- Disproportionate Burden Policy

The Major Service Change Policy defines what actions constitute a major change and are therefore subject to a service or fare equity analysis. The Disparate Impact Policy establishes a threshold for determining when adverse impacts of a proposed change are borne disproportionately by minorities. The Disproportionate Burden Policy establishes a threshold for determining when adverse impacts of a proposed change are borne disproportionately by low-income persons.

Major Service Change Policy (25% Rule)

Major service changes meet at least one of the following criteria:

- Service changes to existing routes that result in an increase or decrease in revenue service hours equal to or greater than 25% of existing revenue service hours, happening one time or cumulatively within a 12-month period.
- A substantial geographical alteration of an existing route affecting more than 25% of its revenue miles, happening one time or cumulatively within a 12-month period.
- A new route.
- Elimination of an existing route or service without alternate fixed route replacement.
- All fare and fare media changes, whether an increase or a decrease.

Changes exempt from qualifying as a major service change include:

- Route changes caused by an emergency.
- Changing a route name or number.
- Introduction or elimination of a limited-term route that will be, or has been, operated for no more than 12 months.
- Promotional or temporary fare reductions lasting no longer than 6 months.

Disparate Impact Policies

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

A disparate impact occurs when a superficially neutral policy, practice or change disproportionately affects members of a group as identified by race, color or national origin. LADOT Transit's disparate impact policies are used to determine if a service change or fare policy change could discriminate against these persons.

Service Changes ("Four-Fifths Rule")

For non-fare-related major service changes, a disparate impact may occur when:

- Benefits are provided to minority populations at a rate less than 80% (four-fifths) than the benefits provided to the non-minority population.
- Adverse impacts from the change are borne by non-minority populations at a rate less than 80% (four-fifths) than the adverse impacts borne by minority populations.

A disparate impact on routes with span of service or frequency changes will be examined on a cumulative basis by evaluating all changes together. A disparate impact on routes with segment or alignment changes will be examined on an individual basis by evaluating the route changes separately.

Fare Policy Changes

The following Minority Disparate Impact Fare Policy was approved by the Los Angeles City Council on May 29, 2014:

LADOT's ridership is a minority majority, and any fare adjustment will result in minority populations bearing an impact that will be similar to that of non-minority populations. In consideration of this reality, LADOT will only implement fare adjustments on the basis of substantial legitimate justification demonstrating that the necessity to change fares meets a need that is in the public interest and that the alternatives would have a more adverse impact than changing fares.

If evidence of a disparate impact is found, LADOT Transit will determine if there are alternatives that would serve the same objectives but with a lesser impact on minority populations. If there are no viable alternatives, LADOT Transit must have a substantial legitimate justification for making the proposed change.

Disproportionate Burden Policies

This policy establishes a threshold for determining whether a given action has a potential disproportionate burden on low-income populations versus non-low-income populations. LADOT Transit's disproportionate burden policies are used to determine if a service change or fare policy change could discriminate against these persons.

Service Changes (“Four-Fifths Rule”)

- Benefits are provided to low-income populations at a rate less than 80% (four-fifths) than the benefits provided to the non-low-income population.
- Adverse impacts from the change are borne by non-low-income populations at a rate less than 80% (four-fifths) than the adverse impacts borne by low-income populations.

A disproportionate burden on routes with span of service or frequency changes will be examined on a cumulative basis by evaluating all changes together. A disproportionate burden on routes with segment or alignment changes will be examined on an individual basis by evaluating the route changes separately.

Fare Policy Changes

The following Low-Income Disproportionate Burden Fare Policy was approved by the Los Angeles City Council on May 29, 2014:

Nearly half of LADOT’s ridership is low-income and predominantly pay their fares with cash. Any increase in cash fares or any decrease in pre-paid fares, such as those offered on smart cards that have lower utilization among low-income persons, can be assumed to be a disproportionate burden for this population. In consideration of this reality, LADOT will only implement fare adjustments on the basis of substantial legitimate justification demonstrating that the necessity to change fares meets a need that is in the public interest and that the alternatives would have a more adverse impact than changing fares.

If evidence of a disproportionate burden is found, LADOT Transit will determine if there are alternatives that would serve the same objectives, but with a lesser impact on low-income populations. If there are no viable alternatives, LADOT Transit must have a substantial legitimate justification for making the proposed change.

Recent Service and Fare Equity Analyses

LADOT Transit conducted a Title VI Fare Equity Analysis for its DASH to Class Program and a Service Equity for LAnow on-demand service. These reports are included as Appendix 2.

CONCLUSION

LADOT Transit is committed to the implementation and enforcement of USDOT’s Title VI regulations while providing the most effective and efficient transit service possible with accountability to all those it serves. Through the use of its service standards and policies, LADOT Transit will ensure that no person or group of persons shall be discriminated against with regard to routing, scheduling, or quality of transit service on the basis of race, color or national origin.

LADOT TRANSIT TITLE VI PROGRAM UPDATE 2021

ATTACHMENT A

ANNUAL CERTIFICATIONS AND ASSURANCES

Not every provision of every certification will apply to every applicant or award. If a provision of a certification does not apply to the applicant or its award, FTA will not enforce that provision. Refer to FTA's accompanying Instructions document for more information.

Text in italics is guidance to the public. It does not have the force and effect of law, and is not meant to bind the public in any way. It is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

CATEGORY 1. CERTIFICATIONS AND ASSURANCES REQUIRED OF EVERY APPLICANT.

All applicants must make the certifications in this category.

1.1. Standard Assurances.

The certifications in this subcategory appear as part of the applicant's registration or annual registration renewal in the System for Award Management (SAM.gov) and on the Office of Management and Budget's standard form 424B "Assurances—Non-Construction Programs". This certification has been modified in places to include analogous certifications required by U.S. DOT statutes or regulations.

As the duly authorized representative of the applicant, you certify that the applicant:

- (a) Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- (b) Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- (c) Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- (d) Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- (e) Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§ 4728–4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 CFR 900, Subpart F).

- (f) Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to:
 - (1) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin, as effectuated by U.S. DOT regulation 49 CFR Part 21;
 - (2) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§ 1681–1683, and 1685–1686), which prohibits discrimination on the basis of sex, as effectuated by U.S. DOT regulation 49 CFR Part 25;
 - (3) Section 5332 of the Federal Transit Law (49 U.S.C. § 5332), which prohibits any person being excluded from participating in, denied a benefit of, or discriminated against under, a project, program, or activity receiving financial assistance from FTA because of race, color, religion, national origin, sex, disability, or age.
 - (4) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794), which prohibits discrimination on the basis of handicaps, as effectuated by U.S. DOT regulation 49 CFR Part 27;
 - (5) The Age Discrimination Act of 1975, as amended (42 U.S.C. §§ 6101–6107), which prohibits discrimination on the basis of age;
 - (6) The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse;
 - (7) The comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91–616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism;
 - (8) Sections 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§ 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records;
 - (9) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§ 3601 et seq.), as amended, relating to nondiscrimination in the sale, rental, or financing of housing;
 - (10) Any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and,
 - (11) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- (g) Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (“Uniform Act”) (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases. The requirements of the Uniform Act are effectuated by U.S. DOT regulation 49 CFR Part 24.

- (h) Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§ 1501–1508 and 7324–7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- (i) Will comply, as applicable, with the provisions of the Davis–Bacon Act (40 U.S.C. §§ 276a to 276a-7), the Copeland Act (40 U.S.C. § 276c and 18 U.S.C. § 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327–333), regarding labor standards for federally assisted construction subagreements.
- (j) Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- (k) Will comply with environmental standards which may be prescribed pursuant to the following:
 - (1) Institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514;
 - (2) Notification of violating facilities pursuant to EO 11738;
 - (3) Protection of wetlands pursuant to EO 11990;
 - (4) Evaluation of flood hazards in floodplains in accordance with EO 11988;
 - (5) Assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.);
 - (6) Conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§ 7401 et seq.);
 - (7) Protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and
 - (8) Protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93–205).
- (l) Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- (m) Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§ 469a-1 et seq.).
- (n) Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- (o) Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§ 2131 et seq.) pertaining to the care, handling, and treatment of warm blooded

- animals held for research, teaching, or other activities supported by this award of assistance.
- (p) Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§ 4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
 - (q) Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and 2 CFR Part 200, Subpart F, “Audit Requirements”, as adopted and implemented by U.S. DOT at 2 CFR Part 1201.
 - (r) Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing the program under which it is applying for assistance.
 - (s) Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. § 7104) which prohibits grant award recipients or a subrecipient from:
 - (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect;
 - (2) Procuring a commercial sex act during the period of time that the award is in effect; or
 - (3) Using forced labor in the performance of the award or subawards under the award.

1.2. Standard Assurances: Additional Assurances for Construction Projects.

This certification appears on the Office of Management and Budget’s standard form 424D “Assurances—Construction Programs” and applies specifically to federally assisted projects for construction. This certification has been modified in places to include analogous certifications required by U.S. DOT statutes or regulations.

As the duly authorized representative of the applicant, you certify that the applicant:

- (a) Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency; will record the Federal awarding agency directives; and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure nondiscrimination during the useful life of the project.
- (b) Will comply with the requirements of the assistance awarding agency with regard to the drafting, review, and approval of construction plans and specifications.
- (c) Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work confirms with the approved plans and specifications, and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.

1.3. Procurement.

The Uniform Administrative Requirements, 2 CFR § 200.324, allow a recipient to self-certify that its procurement system complies with Federal requirements, in lieu of submitting to certain pre-procurement reviews.

The applicant certifies that its procurement system complies with:

- (a) U.S. DOT regulations, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR Part 1201, which incorporates by reference U.S. OMB regulatory guidance, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR Part 200, particularly 2 CFR §§ 200.317–200.326 “Procurement Standards;
- (b) Federal laws, regulations, and requirements applicable to FTA procurements; and
- (c) The latest edition of FTA Circular 4220.1 and other applicable Federal guidance.

1.4. Suspension and Debarment.

Pursuant to Executive Order 12549, as implemented at 2 CFR Parts 180 and 1200, prior to entering into a covered transaction with an applicant, FTA must determine whether the applicant is excluded from participating in covered non-procurement transactions. For this purpose, FTA is authorized to collect a certification from each applicant regarding the applicant’s exclusion status. 2 CFR § 180.300. Additionally, each applicant must disclose any information required by 2 CFR § 180.335 about the applicant and the applicant’s principals prior to entering into an award agreement with FTA. This certification serves both purposes.

The applicant certifies, to the best of its knowledge and belief, that the applicant and each of its principals:

- (a) Is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily or involuntarily excluded from covered transactions by any Federal department or agency;
- (b) Has not, within the preceding three years, been convicted of or had a civil judgment rendered against him or her for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public or private agreement or transaction; violation of Federal or State antitrust statutes, including those proscribing price fixing between competitors, allocation of customers between competitors, and bid rigging; commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, tax evasion, receiving stolen property, making false claims, or obstruction of justice; or commission of any other offense indicating a lack of business integrity or business honesty;

- (c) Is not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any offense described in paragraph (b) of this certification;
- (d) Has not, within the preceding three years, had one or more public transactions (Federal, State, or local) terminated for cause or default.

1.5. Coronavirus Response and Relief Supplemental Appropriations Act, 2021, and CARES Act Funding.

The applicant certifies:

- (a) To the maximum extent possible, funds made available under title IV of division M of the Consolidated Appropriations Act, 2021 (Public Law 116–260), and in title XII of division B of the CARES Act (Public Law 116–136; 134 Stat. 599) shall be directed to payroll and operations of public transit (including payroll and expenses of private providers of public transportation); or
- (a) The applicant certifies that the applicant has not furloughed any employees.

1.6. American Rescue Plan Act Funding.

The applicant certifies:

- (a) Funds made available by Section 3401(a)(2)(A) of the American Rescue Plan Act of 2021 (Public Law 117-2) shall be directed to payroll and operations of public transportation (including payroll and expenses of private providers of public transportation); or
- (b) The applicant certifies that the applicant has not furloughed any employees.

CATEGORY 2. PUBLIC TRANSPORTATION AGENCY SAFETY PLANS

This certification is required of each applicant under the Urbanized Area Formula Grants Program (49 U.S.C. § 5307), each rail operator that is subject to FTA’s state safety oversight programs, and each State that is required to draft and certify a public transportation agency safety plan on behalf of a small public transportation provider pursuant to 49 CFR § 673.11(d). This certification is required by 49 U.S.C. § 5329(d)(1) and 49 CFR § 673.13.

This certification does not apply to any applicant that receives financial assistance from FTA exclusively under the Formula Grants for the Enhanced Mobility of Seniors Program (49 U.S.C. § 5310), the Formula Grants for Rural Areas Program (49 U.S.C. § 5311), or combination of these two programs.

If the applicant is an operator, the applicant certifies that it has established a public transportation agency safety plan meeting the requirements of 49 U.S.C. § 5329(d)(1) and 49 CFR Part 673.

If the applicant is a State, the applicant certifies that:

- (a) It has drafted a public transportation agency safety plan for each small public transportation provider within the State, unless the small public transportation provider provided notification to the State that it was opting out of the State-drafted plan and drafting its own public transportation agency safety plan; and
- (b) Each small public transportation provider within the State has a public transportation agency safety plan that has been approved by the provider's Accountable Executive (as that term is defined at 49 CFR § 673.5) and Board of Directors or Equivalent Authority (as that term is defined at 49 CFR § 673.5).

CATEGORY 3. TAX LIABILITY AND FELONY CONVICTIONS.

If the applicant is a business association (regardless of for-profit, not for-profit, or tax exempt status), it must make this certification. Federal appropriations acts since at least 2014 have prohibited FTA from using funds to enter into an agreement with any corporation that has unpaid Federal tax liabilities or recent felony convictions without first considering the corporation for debarment. E.g., Consolidated Appropriations Act, 2021, Pub. L. 116-260, div. E, title VII, §§ 744–745. U.S. DOT Order 4200.6 defines a “corporation” as “any private corporation, partnership, trust, joint-stock company, sole proprietorship, or other business association”, and applies the restriction to all tiers of subawards. As prescribed by U.S. DOT Order 4200.6, FTA requires each business association applicant to certify as to its tax and felony status.

If the applicant is a private corporation, partnership, trust, joint-stock company, sole proprietorship, or other business association, the applicant certifies that:

- (a) It has no unpaid Federal tax liability that has been assessed, for which all judicial and administrative remedies have been exhausted or have lapsed, and that is not being paid in a timely manner pursuant to an agreement with the authority responsible for collecting the tax liability; and
- (b) It has not been convicted of a felony criminal violation under any Federal law within the preceding 24 months.

CATEGORY 4. LOBBYING.

If the applicant will apply for a grant or cooperative agreement exceeding \$100,000, or a loan, line of credit, loan guarantee, or loan insurance exceeding \$150,000, it must make the following certification and, if applicable, make a disclosure regarding the applicant's lobbying activities. This certification is required by 49 CFR § 20.110 and app. A to that part.

This certification does not apply to an applicant that is an Indian Tribe, Indian organization, or an Indian tribal organization exempt from the requirements of 49 CFR Part 20.

4.1. Certification for Contracts, Grants, Loans, and Cooperative Agreements.

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (a) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (b) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (c) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

4.2. Statement for Loan Guarantees and Loan Insurance.

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

CATEGORY 5. PRIVATE SECTOR PROTECTIONS.

If the applicant will apply for funds that it will use to acquire or operate public transportation facilities or equipment, the applicant must make the following certification regarding protections for the private sector.

5.1. Charter Service Agreement.

To enforce the provisions of 49 U.S.C. § 5323(d), FTA's charter service regulation requires each applicant seeking assistance from FTA for the purpose of acquiring or operating any public transportation equipment or facilities to make the following Charter Service Agreement. 49 CFR § 604.4.

The applicant agrees that it, and each of its subrecipients, and third party contractors at any level who use FTA-funded vehicles, may provide charter service using equipment or facilities acquired with Federal assistance authorized under the Federal Transit Laws only in compliance with the regulations set out in 49 CFR Part 604, the terms and conditions of which are incorporated herein by reference.

5.2. School Bus Agreement.

To enforce the provisions of 49 U.S.C. § 5323(f), FTA's school bus regulation requires each applicant seeking assistance from FTA for the purpose of acquiring or operating any public transportation equipment or facilities to make the following agreement regarding the provision of school bus services. 49 CFR § 605.15.

- (a) If the applicant is not authorized by the FTA Administrator under 49 CFR § 605.11 to engage in school bus operations, the applicant agrees and certifies as follows:
 - (1) The applicant and any operator of project equipment agrees that it will not engage in school bus operations in competition with private school bus operators.
 - (2) The applicant agrees that it will not engage in any practice which constitutes a means of avoiding the requirements of this agreement, part 605 of the Federal Mass Transit Regulations, or section 164(b) of the Federal-Aid Highway Act of 1973 (49 U.S.C. 1602a(b)).
- (b) If the applicant is authorized or obtains authorization from the FTA Administrator to engage in school bus operations under 49 CFR § 605.11, the applicant agrees as follows:

- (1) The applicant agrees that neither it nor any operator of project equipment will engage in school bus operations in competition with private school bus operators except as provided herein.
- (2) The applicant, or any operator of project equipment, agrees to promptly notify the FTA Administrator of any changes in its operations which might jeopardize the continuation of an exemption under § 605.11.
- (3) The applicant agrees that it will not engage in any practice which constitutes a means of avoiding the requirements of this agreement, part 605 of the Federal Transit Administration regulations or section 164(b) of the Federal-Aid Highway Act of 1973 (49 U.S.C. 1602a(b)).
- (4) The applicant agrees that the project facilities and equipment shall be used for the provision of mass transportation services within its urban area and that any other use of project facilities and equipment will be incidental to and shall not interfere with the use of such facilities and equipment in mass transportation service to the public.

CATEGORY 6. TRANSIT ASSET MANAGEMENT PLAN.

If the applicant owns, operates, or manages capital assets used to provide public transportation, the following certification is required by 49 U.S.C. § 5326(a).

The applicant certifies that it is in compliance with 49 CFR Part 625.

CATEGORY 7. ROLLING STOCK BUY AMERICA REVIEWS AND BUS TESTING.

7.1. Rolling Stock Buy America Reviews.

If the applicant will apply for an award to acquire rolling stock for use in revenue service, it must make this certification. This certification is required by 49 CFR § 663.7.

The applicant certifies that it will conduct or cause to be conducted the pre-award and post-delivery audits prescribed by 49 CFR Part 663 and will maintain on file the certifications required by Subparts B, C, and D of 49 CFR Part 663.

7.2. Bus Testing.

If the applicant will apply for funds for the purchase or lease of any new bus model, or any bus model with a major change in configuration or components, the applicant must make this certification. This certification is required by 49 CFR § 665.7.

The applicant certifies that the bus was tested at the Bus Testing Facility and that the bus received a passing test score as required by 49 CFR Part 665. The applicant has received or will

receive the appropriate full Bus Testing Report and any applicable partial testing reports before final acceptance of the first vehicle.

CATEGORY 8. URBANIZED AREA FORMULA GRANTS PROGRAM.

If the applicant will apply for an award under the Urbanized Area Formula Grants Program (49 U.S.C. § 5307), or any other program or award that is subject to the requirements of 49 U.S.C. § 5307, including the Formula Grants for the Enhanced Mobility of Seniors Program (49 U.S.C. § 5310); “flex funds” from infrastructure programs administered by the Federal Highways Administration (see 49 U.S.C. § 5334(i)); projects that will receive an award authorized by the Transportation Infrastructure Finance and Innovation Act (“TIFIA”) (23 U.S.C. §§ 601–609) or State Infrastructure Bank Program (23 U.S.C. § 610) (see 49 U.S.C. § 5323(o)); formula awards or competitive awards to urbanized areas under the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339(a) and (b)); or low or no emission awards to any area under the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339(c)), the applicant must make the following certification. This certification is required by 49 U.S.C. § 5307(c)(1).

The applicant certifies that it:

- (a) Has or will have the legal, financial, and technical capacity to carry out the program of projects (developed pursuant 49 U.S.C. § 5307(b)), including safety and security aspects of the program;
- (b) Has or will have satisfactory continuing control over the use of equipment and facilities;
- (c) Will maintain equipment and facilities in accordance with the applicant’s transit asset management plan;
- (d) Will ensure that, during non-peak hours for transportation using or involving a facility or equipment of a project financed under this section, a fare that is not more than 50 percent of the peak hour fare will be charged for any—
 - (1) Senior;
 - (2) Individual who, because of illness, injury, age, congenital malfunction, or any other incapacity or temporary or permanent disability (including an individual who is a wheelchair user or has semi-ambulatory capability), cannot use a public transportation service or a public transportation facility effectively without special facilities, planning, or design; and
 - (3) Individual presenting a Medicare card issued to that individual under title II or XVIII of the Social Security Act (42 U.S.C. §§ 401 et seq., and 1395 et seq.);
- (e) In carrying out a procurement under 49 U.S.C. § 5307, will comply with 49 U.S.C. §§ 5323 (general provisions) and 5325 (contract requirements);
- (f) Has complied with 49 U.S.C. § 5307(b) (program of projects requirements);

- (g) Has available and will provide the required amounts as provided by 49 U.S.C. § 5307(d) (cost sharing);
- (h) Will comply with 49 U.S.C. §§ 5303 (metropolitan transportation planning) and 5304 (statewide and nonmetropolitan transportation planning);
- (i) Has a locally developed process to solicit and consider public comment before raising a fare or carrying out a major reduction of transportation;
- (j) Either—
 - (1) Will expend for each fiscal year for public transportation security projects, including increased lighting in or adjacent to a public transportation system (including bus stops, subway stations, parking lots, and garages), increased camera surveillance of an area in or adjacent to that system, providing an emergency telephone line to contact law enforcement or security personnel in an area in or adjacent to that system, and any other project intended to increase the security and safety of an existing or planned public transportation system, at least 1 percent of the amount the recipient receives for each fiscal year under 49 U.S.C. § 5336; or
 - (2) Has decided that the expenditure for security projects is not necessary;
- (k) In the case of an applicant for an urbanized area with a population of not fewer than 200,000 individuals, as determined by the Bureau of the Census, will submit an annual report listing projects carried out in the preceding fiscal year under 49 U.S.C. § 5307 for associated transit improvements as defined in 49 U.S.C. § 5302; and
- (l) Will comply with 49 U.S.C. § 5329(d) (public transportation agency safety plan).

CATEGORY 9. FORMULA GRANTS FOR RURAL AREAS.

If the applicant will apply for funds made available to it under the Formula Grants for Rural Areas Program (49 U.S.C. § 5311), it must make this certification. Paragraph (a) of this certification helps FTA make the determinations required by 49 U.S.C. § 5310(b)(2)(C). Paragraph (b) of this certification is required by 49 U.S.C. § 5311(f)(2). Paragraph (c) of this certification, which applies to funds apportioned for the Appalachian Development Public Transportation Assistance Program, is necessary to enforce the conditions of 49 U.S.C. § 5311(c)(2)(D).

- (a) The applicant certifies that its State program for public transportation service projects, including agreements with private providers for public transportation service—
 - (1) Provides a fair distribution of amounts in the State, including Indian reservations; and
 - (2) Provides the maximum feasible coordination of public transportation service assisted under 49 U.S.C. § 5311 with transportation service assisted by other Federal sources; and

- (b) If the applicant will in any fiscal year expend less than 15% of the total amount made available to it under 49 U.S.C. § 5311 to carry out a program to develop and support intercity bus transportation, the applicant certifies that it has consulted with affected intercity bus service providers, and the intercity bus service needs of the State are being met adequately.
- (c) If the applicant will use for a highway project amounts that cannot be used for operating expenses authorized under 49 U.S.C. § 5311(c)(2) (Appalachian Development Public Transportation Assistance Program), the applicant certifies that—
 - (1) It has approved the use in writing only after providing appropriate notice and an opportunity for comment and appeal to affected public transportation providers; and
 - (2) It has determined that otherwise eligible local transit needs are being addressed.

CATEGORY 10. FIXED GUIDEWAY CAPITAL INVESTMENT GRANTS AND THE EXPEDITED PROJECT DELIVERY FOR CAPITAL INVESTMENT GRANTS PILOT PROGRAM.

If the applicant will apply for an award under any subsection of the Fixed Guideway Capital Investment Program (49 U.S.C. § 5309), including an award made pursuant to the FAST Act's Expedited Project Delivery for Capital Investment Grants Pilot Program (Pub. L. 114-94, div. A, title III, § 3005(b)), the applicant must make the following certification. This certification is required by 49 U.S.C. § 5309(c)(2) and Pub. L. 114-94, div. A, title III, § 3005(b)(3)(B).

The applicant certifies that it:

- (a) Has or will have the legal, financial, and technical capacity to carry out its Award, including the safety and security aspects of that Award,
- (b) Has or will have satisfactory continuing control over the use of equipment and facilities acquired or improved under its Award.
- (c) Will maintain equipment and facilities acquired or improved under its Award in accordance with its transit asset management plan; and
- (d) Will comply with 49 U.S.C. §§ 5303 (metropolitan transportation planning) and 5304 (statewide and nonmetropolitan transportation planning).

CATEGORY 11. GRANTS FOR BUSES AND BUS FACILITIES AND LOW OR NO EMISSION VEHICLE DEPLOYMENT GRANT PROGRAMS.

If the applicant is in an urbanized area and will apply for an award under subsection (a) (formula grants), subsection (b) (buses and bus facilities competitive grants), or subsection (c) (low or no emissions grants) of the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339), the applicant must make the certification in Category 8 for Urbanized Area Formula

Grants (49 U.S.C. § 5307). This certification is required by 49 U.S.C. § 5339(a)(3), (b)(6), and (c)(3), respectively.

If the applicant is in a rural area and will apply for an award under subsection (a) (formula grants), subsection (b) (bus and bus facilities competitive grants), or subsection (c) (low or no emissions grants) of the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339), the applicant must make the certification in Category 9 for Formula Grants for Rural Areas (49 U.S.C. § 5311). This certification is required by 49 U.S.C. § 5339(a)(3), (b)(6), and (c)(3), respectively.

Making this certification will incorporate by reference the applicable certifications in Category 8 or Category 9.

If the applicant will receive a competitive award under subsection (b) (buses and bus facilities competitive grants), or subsection (c) (low or no emissions grants) of the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339) related to zero emissions vehicles or related infrastructure, it must make the following certification. This certification is required by 49 U.S.C. § 5339(d).

The applicant will use 5 percent of grants related to zero emissions vehicles (as defined in subsection (c)(1)) or related infrastructure under subsection (b) or (c) to fund workforce development training as described in section 49 U.S.C. § 5314(b)(2) (including registered apprenticeships and other labor-management training programs) under the recipient's plan to address the impact of the transition to zero emission vehicles on the applicant's current workforce; or the applicant certifies a smaller percentage is necessary to carry out that plan.

CATEGORY 12. ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABILITIES PROGRAMS.

If the applicant will apply for an award under the Formula Grants for the Enhanced Mobility of Seniors and Individuals with Disabilities Program (49 U.S.C. § 5310), it must make the certification in Category 8 for Urbanized Area Formula Grants (49 U.S.C. § 5307). This certification is required by 49 U.S.C. § 5310(e)(1). Making this certification will incorporate by reference the certification in Category 8, except that FTA has determined that (d), (f), (i), (j), and (k) of Category 8 do not apply to awards made under 49 U.S.C. § 5310 and will not be enforced.

In addition to the certification in Category 8, the applicant must make the following certification that is specific to the Formula Grants for the Enhanced Mobility of Seniors and Individuals with Disabilities Program. This certification is required by 49 U.S.C. § 5310(e)(2).

The applicant certifies that:

- (a) The projects selected by the applicant are included in a locally developed, coordinated public transit-human services transportation plan;
- (b) The plan described in clause (a) was developed and approved through a process that included participation by seniors, individuals with disabilities, representatives of public, private, and nonprofit transportation and human services providers, and other members of the public;
- (c) To the maximum extent feasible, the services funded under 49 U.S.C. § 5310 will be coordinated with transportation services assisted by other Federal departments and agencies, including any transportation activities carried out by a recipient of a grant from the Department of Health and Human Services; and
- (d) If the applicant will allocate funds received under 49 U.S.C. § 5310 to subrecipients, it will do so on a fair and equitable basis.

CATEGORY 13. STATE OF GOOD REPAIR GRANTS.

If the applicant will apply for an award under FTA's State of Good Repair Grants Program (49 U.S.C. § 5337), it must make the following certification. Because FTA generally does not review the transit asset management plans of public transportation providers, the asset management certification is necessary to enforce the provisions of 49 U.S.C. § 5337(a)(4). The certification with regard to acquiring restricted rail rolling stock is required by 49 U.S.C. § 5323(u)(4). Note that this certification is not limited to the use of Federal funds.

The applicant certifies that the projects it will carry out using assistance authorized by the State of Good Repair Grants Program, 49 U.S.C. § 5337, are aligned with the applicant's most recent transit asset management plan and are identified in the investment and prioritization section of such plan, consistent with the requirements of 49 CFR Part 625.

If the applicant operates a rail fixed guideway service, the applicant certifies that, in the fiscal year for which an award is available to the applicant under the State of Good Repair Grants Program, 49 U.S.C. § 5337, the applicant will not award any contract or subcontract for the procurement of rail rolling stock for use in public transportation with a rail rolling stock manufacturer described in 49 U.S.C. § 5323(u)(1).

CATEGORY 14. INFRASTRUCTURE FINANCE PROGRAMS.

If the applicant will apply for an award for a project that will include assistance under the Transportation Infrastructure Finance and Innovation Act ("TIFIA") Program (23 U.S.C. §§ 601–609) or the State Infrastructure Banks ("SIB") Program (23 U.S.C. § 610), it must make the certifications in Category 8 for the Urbanized Area Formula Grants Program, Category 10 for the Fixed Guideway Capital Investment Grants program, and Category 13 for the State of Good Repair Grants program. These certifications are required by 49 U.S.C. § 5323(o).

Making this certification will incorporate the certifications in Categories 8, 10, and 13 by reference.

CATEGORY 15. ALCOHOL AND CONTROLLED SUBSTANCES TESTING.

If the applicant will apply for an award under FTA's Urbanized Area Formula Grants Program (49 U.S.C. § 5307), Fixed Guideway Capital Investment Program (49 U.S.C. § 5309), Formula Grants for Rural Areas Program (49 U.S.C. § 5311), or Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339) programs, the applicant must make the following certification. The applicant must make this certification on its own behalf and on behalf of its subrecipients and contractors. This certification is required by 49 CFR § 655.83.

The applicant certifies that it, its subrecipients, and its contractors are compliant with FTA's regulation for the Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations, 49 CFR Part 655.

CATEGORY 16. RAIL SAFETY TRAINING AND OVERSIGHT.

If the applicant is a State with at least one rail fixed guideway system, or is a State Safety Oversight Agency, or operates a rail fixed guideway system, it must make the following certification. The elements of this certification are required by 49 CFR §§ 672.31 and 674.39.

The applicant certifies that the rail fixed guideway public transportation system and the State Safety Oversight Agency for the State are:

- (a) Compliant with the requirements of 49 CFR Part 672, "Public Transportation Safety Certification Training Program"; and
- (b) Compliant with the requirements of 49 CFR Part 674, "State Safety Oversight".

CATEGORY 17. DEMAND RESPONSIVE SERVICE.

If the applicant operates demand responsive service and will apply for an award to purchase a non-rail vehicle that is not accessible within the meaning of 49 CFR Part 37, it must make the following certification. This certification is required by 49 CFR § 37.77.

The applicant certifies that the service it provides to individuals with disabilities is equivalent to that provided to other persons. A demand responsive system, when viewed in its entirety, is deemed to provide equivalent service if the service available to individuals with disabilities, including individuals who use wheelchairs, is provided in the most integrated setting appropriate to the needs of the individual and is equivalent to the service provided other individuals with respect to the following service characteristics:

- (a) Response time;

- (b) Fares;
- (c) Geographic area of service;
- (d) Hours and days of service;
- (e) Restrictions or priorities based on trip purpose;
- (f) Availability of information and reservation capability; and
- (g) Any constraints on capacity or service availability.

CATEGORY 18. INTEREST AND FINANCING COSTS.

If the applicant will pay for interest or other financing costs of a project using assistance awarded under the Urbanized Area Formula Grants Program (49 U.S.C. § 5307), the Fixed Guideway Capital Investment Grants Program (49 U.S.C. § 5309), or any program that must comply with the requirements of 49 U.S.C. § 5307, including the Formula Grants for the Enhanced Mobility of Seniors Program (49 U.S.C. § 5310), “flex funds” from infrastructure programs administered by the Federal Highways Administration (see 49 U.S.C. § 5334(i)), or awards to urbanized areas under the Grants for Buses and Bus Facilities Program (49 U.S.C. § 5339), the applicant must make the following certification. This certification is required by 49 U.S.C. §§ 5307(e)(3) and 5309(k)(2)(D).

The applicant certifies that:

- (a) Its application includes the cost of interest earned and payable on bonds issued by the applicant only to the extent proceeds of the bonds were or will be expended in carrying out the project identified in its application; and
- (b) The applicant has shown or will show reasonable diligence in seeking the most favorable financing terms available to the project at the time of borrowing.

CATEGORY 19. CYBERSECURITY CERTIFICATION FOR RAIL ROLLING STOCK AND OPERATIONS.

If the applicant operates a rail fixed guideway public transportation system, it must make this certification. This certification is required by 49 U.S.C. § 5323(v), a new subsection added by the National Defense Authorization Act for Fiscal Year 2020, Pub. L. 116-92, § 7613 (Dec. 20, 2019). For information about standards or practices that may apply to a rail fixed guideway public transportation system, visit <https://www.nist.gov/cyberframework> and <https://www.cisa.gov/>.

The applicant certifies that it has established a process to develop, maintain, and execute a written plan for identifying and reducing cybersecurity risks that complies with the requirements of 49 U.S.C. § 5323(v)(2).

**CATEGORY 20. PUBLIC TRANSPORTATION ON INDIAN RESERVATIONS
FORMULA AND DISCRETIONARY PROGRAM (TRIBAL TRANSIT
PROGRAMS).**

Before FTA may provide Federal assistance for an Award financed under either the Public Transportation on Indian Reservations Formula or Discretionary Program authorized under 49 U.S.C. § 5311(c)(1), as amended by the FAST Act, (Tribal Transit Programs), the applicant must select the Certifications in Category 21, except as FTA determines otherwise in writing. Tribal Transit Program applicants may certify to this Category and Category 1 (Certifications and Assurances Required of Every Applicant) and need not make any other certification, to meet Tribal Transit Program certification requirements. If an applicant will apply for any program in addition to the Tribal Transit Program, additional certifications may be required.

FTA has established terms and conditions for Tribal Transit Program grants financed with Federal assistance appropriated or made available under 49 U.S.C. § 5311(c)(1). The applicant certifies that:

- (a) It has or will have the legal, financial, and technical capacity to carry out its Award, including the safety and security aspects of that Award.
- (b) It has or will have satisfactory continuing control over the use of its equipment and facilities acquired or improved under its Award.
- (c) It will maintain its equipment and facilities acquired or improved under its Award, in accordance with its transit asset management plan and consistent with FTA regulations, “Transit Asset Management,” 49 CFR Part 625. Its Award will achieve maximum feasible coordination with transportation service financed by other federal sources.
- (d) With respect to its procurement system:
 - (1) It will have a procurement system that complies with U.S. DOT regulations, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR Part 1201, which incorporates by reference U.S. OMB regulatory guidance, “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards,” 2 CFR Part 200, for Awards made on or after December 26, 2014,
 - (2) It will have a procurement system that complies with U.S. DOT regulations, “Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments,” 49 CFR Part 18, specifically former 49 CFR § 18.36, for Awards made before December 26, 2014, or
 - (3) It will inform FTA promptly if its procurement system does not comply with either of those U.S. DOT regulations.
- (e) It will comply with the Certifications, Assurances, and Agreements in:
 - (1) Category 05.1 and 05.2 (Charter Service Agreement and School Bus Agreement),
 - (2) Category 06 (Transit Asset Management Plan),

- (3) Category 07.1 and 07.2 (Rolling Stock Buy America Reviews and Bus Testing),
- (4) Category 09 (Formula Grants for Rural Areas),
- (5) Category 15 (Alcohol and Controlled Substances Testing), and
- (6) Category 17 (Demand Responsive Service).

CATEGORY 21. EMERGENCY RELIEF PROGRAM.

An applicant to the Public Transportation Emergency Relief Program, 49 U.S.C. § 5324, must make the following certification. The certification is required by 49 U.S.C. § 5324(f) and must be made before the applicant can receive a grant under the Emergency Relief program.

The applicant certifies that the applicant has insurance required under State law for all structures related to the emergency relief program grant application.

**FEDERAL FISCAL YEAR 2022 CERTIFICATIONS AND ASSURANCES FOR FTA
ASSISTANCE PROGRAMS**

(Signature pages alternate to providing Certifications and Assurances in TrAMS.)

Name of Applicant: City of Los Angeles

The Applicant certifies to the applicable provisions of all categories: (*check here*) _____.

Or,

The Applicant certifies to the applicable provisions of the categories it has selected:

Category	Certification
01 Certifications and Assurances Required of Every Applicant	<u>X</u>
02 Public Transportation Agency Safety Plans	<u>X</u>
03 Tax Liability and Felony Convictions	<u>X</u>
04 Lobbying	<u>X</u>
05 Private Sector Protections	<u>X</u>
06 Transit Asset Management Plan	<u>X</u>
07 Rolling Stock Buy America Reviews and Bus Testing	<u>X</u>
08 Urbanized Area Formula Grants Program	<u>X</u>
09 Formula Grants for Rural Areas	<u>X</u>
10 Fixed Guideway Capital Investment Grants and the Expedited Project Delivery for Capital Investment Grants Pilot Program	<u>X</u>
11 Grants for Buses and Bus Facilities and Low or No Emission Vehicle Deployment Grant Programs	<u>X</u>

12	Enhanced Mobility of Seniors and Individuals with Disabilities Programs	<u>X</u>
		<u>X</u>
13	State of Good Repair Grants	<u>X</u>
14	Infrastructure Finance Programs	<u>X</u>
15	Alcohol and Controlled Substances Testing	<u>X</u>
16	Rail Safety Training and Oversight	<u>X</u>
17	Demand Responsive Service	<u>X</u>
18	Interest and Financing Costs	<u>X</u>
19	Cybersecurity Certification for Rail Rolling Stock and Operations	<u>X</u>
20	Tribal Transit Programs	<u>X</u>
21	Emergency Relief Program	<u>X</u>

CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

AFFIRMATION OF APPLICANT

City of Los Angeles

Name of the Applicant: _____

BY SIGNING BELOW, on behalf of the Applicant, I declare that it has duly authorized me to make these Certifications and Assurances and bind its compliance. Thus, it agrees to comply with all federal laws, regulations, and requirements, follow applicable federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its Authorized Representative makes to the Federal Transit Administration (FTA) in the federal fiscal year, irrespective of whether the individual that acted on his or her Applicant's behalf continues to represent it.

The Certifications and Assurances the Applicant selects apply to each Award for which it now seeks, or may later seek federal assistance to be awarded by FTA during the federal fiscal year.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. § 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. § 1001 apply to any certification, assurance, or submission made in connection with a federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature  Date: March 23, 2022

Name David Somers Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): City of Los Angeles

As the undersigned Attorney for the above-named Applicant, I hereby affirm to the Applicant that it has authority under state, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on it.

I further affirm that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA assisted Award.

Signature  Date: Mar 30, 2022
Jonathan Groat (Mar 30, 2022 17:25 PDT)

Name Jonathan Groat Attorney for Applicant

Each Applicant for federal assistance to be awarded by FTA must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its electronic signature in lieu of the Attorney's signature within TrAMS, provided the Applicant has on file and uploaded to TrAMS this hard-copy Affirmation, signed by the attorney and dated this federal fiscal year.

LADOT TRANSIT TITLE VI PROGRAM UPDATE 2021

ATTACHMENT B

COUNCIL FILE 18-1036

RESOLUTION

TRANSPORTATION

WHEREAS, the Federal Transit Administration (FTA), as the operating administrator of the United States Department of Transportation, requires periodic renewal of a resolution authorizing the filing of grant applications for Federal transportation assistance, authorized by 49 U.S.C Chapter 53, title 23 United States code and other Federal statutes administered by the FTA; and

WHEREAS, the FTA has been delegated authority to award federal financial assistance for a transportation project; and

WHEREAS, the Los Angeles Department of Transportation (LADOT) has received authority from the Designated Recipient, the Southern California Association of Governments (SCAG), to apply for Urbanized Area Formula Funding program assistance and the FTA has been delegated authority to award federal financial assistance for a transportation project; and

WHEREAS, a grant or cooperative agreement for federal financial assistance will impose certain obligations upon an applicant, and may require an applicant to provide the local share of a project's cost; and

WHEREAS, the FTA requires an applicant to provide all annual certifications and assurances required for a project; and

WHEREAS, LADOT submits grant applications to the FTA, which contain multiple projects that were approved by the City Council through specific Council action on the Transportation Grant Fund (TGF) report and the budget process, and it is important that LADOT have the flexibility to initiate grant submittals that may change funding sources without additional Council approval, as long as any funding changes do not increase the City's monetary funding obligation responsibility and/or liability; and

WHEREAS, in 2004, the City authorized the Los Angeles Department of Transportation (LADOT) to accept and execute FTA grants (C.F. 05-0002-S14); and

WHEREAS, the FTA is requesting the City to reaffirm the grant authorization for LADOT;

NOW, THEREFORE BE IT RESOLVED, that with the concurrence of the Mayor, that by the adoption of this Resolution, the City of Los Angeles hereby AUTHORIZES the General Manager of the Department of Transportation or his/her designee, for projects having received approval by the City Council, as follows:

1. To execute and file applications for federal assistance on behalf of the City of Los Angeles with the Federal Transit Administration (FTA) for federal assistance authorized by 49 U.S.C. Chapter 53, title 23, United States Code, or other federal statutes authorizing a project administered by the FTA; and
2. To execute and file with its applications the annual certifications and assurances and other documents the FTA requires before awarding a federal assistance grant or cooperative agreement; and
3. To execute grant and cooperative agreements with the FTA on behalf of the City of Los Angeles; subject to the approval of the City Attorney as to form and legality.

PRESENTED BY:


MIKE BONIN

Councilmember, 11th District

SECONDED BY:



NOV 02 2018

ORIGINAL

LADOT TRANSIT TITLE VI PROGRAM UPDATE 2021

ATTACHMENT C

TITLE VI COMPLAINT FORM IN TAGOLOG AND SPANISH

PAMAMALAKAD NAUUKOL SA TITLE VI SA LADOT

Sumusunod ang Los Angeles City Department of Transportation sa lahat ng inaatas na federal sa ilalim ng Title VI ng Civil Rights Act of 1964 [batas noong 1964 tungol sa mga karapatang sibil], ayon sa binago. Tapat ang LADOT na siguraduhin na walang tao ang hindi makasama sa, o tanggihang makatanggap ng mga kapakanan ng mga pagsilbi nito batayan sa lahi, kulay o pinanggalingang bansa.

Maaring mag-file [magsampa] ng reklamong nauukol sa Title VI sa LADOT ang sinumang naniniwala na siya, isa-isa, o bilang kasapi sa anumang tiyak na uring mga tao, ay naapi ng discrimination [pagtatanging masama] batayan sa lahi, kulay o pinanggalingang bansa.

Dapat i-file ang reklamo sa loob ng 180ng araw mula sa petsa ng sinumbong na discrimination. Upang mag-file ng isang formal na reklamo, maari ninyong i-download ang complaint form [pangreklamo] sa website na ito, o maari ninyong damputin ang form sa LADOT Transit Store, 201 N. Los Angeles St, Space 16, Los Angeles, CA 90012. Maaring ipadala ang mga nakasulat na reklamo sa:

Title VI Liaison

LADOT Transit Bureau

100 S. Main Street, 10th Floor

Los Angeles, CA 90012

Maari din kayong mag-email sa amin sa ladot.titlevi@lacity.org o maari kayong makiugnay sa Title VI Liaison sa 213-928-9769.

Makatatanggap ang mga nagreklamo ng kasulatan na sagot mula sa LADOT tungkol sa kanilang reklamo. Sisikapin ng LADOT na kumpletuhin ang imbestigasyon at magpadala ng nakasulat na sagot sa loob ng 60ng araw mula sa pagtanggap ng reklamo.

Bukod sa paraang pangreklamo nauukol sa Title VI sa LADOT, maaring mag-file ang mga nagreklamo ng isang reklamong nauukol sa Title VI sa Federal Transit Administration, Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839.



100 S. Main Street, 10th Floor
Los Angeles, CA 90012

Form Pangreklamong nauukol sa Title VI

Inaatas ng Title VI ng 1964 Civil Rights Act [batas noong 1964 tungol sa mga karapatang sibil] na “Walang tao sa United States, dahil sa lahi, kulay o pinanggalingang bansa, ay maaring hindi makasali sa, tangihang makatanggap ng mga kapakanan ng, o makaranas ng discrimination [pagtatanging masama] sa ilalim ng anumang program o gawaing tumatanggap ng tulong na pananalaping federal.”

Kinakailangan namin ang mga sumusunod na impormasyon para sa pagpalakad ng inyong reklamo. Kung sakaling kinakailangan ninyo ng tulong upang kumpletuhin ang form na ito, paki-abisuhan kami.

Kumpletuhin at ibalik ang form na ito sa:

Title VI Liaison
LADOT Transit Bureau
100 S. Main Street, 10th Floor
Los Angeles, CA 90012

Email: ladot.titlevi@lacity.org.

1. Pangalan ng Nagrereklamo: _____
2. Address: _____
3. Lunsod: _____ State: _____ Zip Code: _____
4. Telephone Number (bahay): (negosyo): _____
5. Email Address: _____
6. Ipina-file [isinasampa] ba ninyo ang form na ito para sa sarili ninyo?
☐ Oo ☐ Hindi

Kung hindi, paki-ipahayag ang pangalan ng taong naapi ng pag-discriminate:

Pangalan: _____

Address: _____

Lunsod: _____ State: _____ Zip Code: _____

Kaano-ano ninyo: _____

Dahilang ng ipina-file ninyo ang reklamong ito: _____

7. Alin sa mga sumusunod ang naglalarawan nang pinakamahusay ng dahilan na nangyari ang discrimination? Ito ba ay dahil sa inyong:

a. Lahi/Kulay: ☐

b. Pinanggalingang Bansa: ☐

8. Sa anong petsa nangyari ang sinasabing discrimination? _____

9. Sa inyong sarili salita, paki-isalarawan ang sinasabing discrimination. Ipaliwanag kung anong nangyari at kung sino sa akala ninyo ang may-pananagutan. Tukuyin ang mga pangalan, route number, bus number, pangalan ng mga witness [saksi] o anumang iba pang impormasyon na nauukol sa akala ninyo. Paki-gamitin ang likod ng form na ito kung nangangailangan ng karagdagang susulatan.

10. Nag-reklamo na ba kayo sa anumang iba pang tanggapang federal, state o local [sa kinaroroonan ninyo]; o sa anumang court na federal or state?

☐ Oo ☐ Hindi

Kung oo, paki-check ang bawat bagay na kahon:

☐ Tanggapang federal

☐ Court na federal

☐ Tanggapang state

☐ Court na state

☐ Tanggapang local

11. Kung nai-file din ang reklamong ito sa ibang lugar, paki-ipagkaloob ang impormasyon tungkol sa taong nakiuugnay sa tanggapan/court kung saan nai-file ang reklamo.

Pangalan: _____

Address: _____

Lunsod: _____ State: _____ Zip Code: _____

12. Paki-pirma sa sumusunod. Maari kayong maglakip ng anumang nakasulat na bagay o iba pang impormasyon na sa akala ninyo nauukol sa inyong reklamo.

Pirma ng Nagrereklamo

Petsa

LADOT TITLE VI POLICY (POLÍTICA DEL TÍTULO VI DE LADOT)

El Departamento de Transporte de la Ciudad de Los Angeles (LADOT, por sus siglas en inglés) cumple con todos los requisitos federales estipulados por el Título VI de la Ley de Derechos Civiles de 1964, según su enmienda. LADOT está comprometido a asegurar que ninguna persona sea excluida de participar en los beneficios de sus servicios, o que estos se le nieguen, por motivos de raza, color o nacionalidad.

Toda persona que considere que ha sido, individualmente o como miembro de cualquier grupo específico de personas, víctima de un acto de discriminación por motivos de raza, color o nacionalidad, puede presentar una queja conforme al Título VI ante el LADOT.

La queja debe presentarse dentro de los 180 días de ocurrido el presunto hecho de discriminación. Para presentar una queja formal, puede descargar el formulario de quejas del sitio web o puede recoger un formulario en la Tienda de Tránsito de LADOT en 201 N. Los Angeles St, Space 16, Los Angeles, CA 90012.

Las quejas por escrito deben enviarse a:

Title VI Liaison
LADOT Transit Bureau
100 S. Main Street, 10th Floor
Los Angeles, CA 90012

También puede hacerlo por correo electrónico a ladot.titlevi@lacity.org o bien, puede comunicarse con el Coordinador del Título VI al 213-928-9769.

LADOT le enviará a la persona que presentó la queja una respuesta por escrito. LADOT hará lo posible por completar la investigación y enviar una respuesta por escrito dentro de los 60 días a partir del día en que se recibió la queja.

Además del proceso de queja del Título VI realizado en LADOT, también se puede presentar una queja conforme al Título VI en Federal Transit Administration, Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839.



100 S. Main Street, 10th Floor
Los Angeles, CA 90012

Formulario de quejas conforme al Título VI

El Título VI de la Ley de Derechos Civiles de 1964 estipula que “ninguna persona en los Estados Unidos podrá, por motivos de raza, color o nacionalidad, ser excluida de participar en los beneficios de sus servicios, o que estos se le nieguen, ni podrá ser víctima de ningún acto de discriminación conforme a ningún programa o actividad que reciba asistencia financiera del gobierno federal”.

La siguiente información es necesaria para que podamos procesar su queja. Si necesita ayuda para completar este formulario, háganoslo saber.

Complete y devuelva este formulario a:

Title VI Liaison
LADOT Transit Bureau
100 S. Main Street, 10th Floor
Los Angeles, CA 90012

Correo electrónico: ladot.titlevi@lacity.org.

1. Nombre de quien presenta la queja: _____

2. Dirección: _____

3. Ciudad: _____ Estado: _____ Código postal: _____

4. Número de teléfono (casa): (trabajo): _____

5. Dirección de correo electrónico: _____

6. ¿Está presentando esta queja en su propio nombre? ☐ Sí ☐ No

De no ser así, indique el nombre de la persona contra la cual se realizó un acto de discriminación.

Nombre: _____

Dirección: _____

Ciudad: _____ Estado: _____ Código postal: _____

Relación con usted: _____

Razón por la cual presenta esta queja: _____

7. ¿Cuál de las siguientes opciones describe mejor la razón por la cual cree que ocurrió el acto de discriminación? Fue debido a su:

- a. Raza/color: ☐
- b. Nacionalidad: ☐

8. ¿En qué fecha ocurrió el presunto acto de discriminación? _____

9. En sus propias palabras, describa el presunto acto de discriminación. Explique lo que ocurrió y quién cree usted que fue el responsable. Incluya nombres, números de rutas, números del autobús, nombres de testigos o cualquier otra información que considere que podría ser relevante. Utilice el dorso de este formulario si necesita más espacio.

10. ¿Ha presentado esta queja ante cualquier otra agencia local, estatal o federal, o ante cualquier tribunal estatal o federal? ☐ Sí ☐ No

Si la respuesta es afirmativa, marque todas las casillas que correspondan:

- ☐ Agencia federal
- ☐ Tribunal federal
- ☐ Agencia estatal
- ☐ Tribunal estatal
- ☐ Agencia local

11. Si también presentó esta queja ante cualquier otra entidad, suministre información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.

Nombre: _____

Dirección: _____

Ciudad: _____ Estado: _____ Código postal: _____

12. Firme abajo. Puede adjuntar cualquier material escrito u otra información que usted considere relevante para su queja.

Firma de quien presenta la queja

Fecha

LADOT TRANSIT TITLE VI PROGRAM UPDATE 2021

ATTACHMENT D

TITLE VI IN-VEHICLE NOTICE

YOUR TITLE VI RIGHTS/ SUS DERECHOS CONFORME AL TÍTULO VI

The City of Los Angeles Department of Transportation (LADOT) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended. Any person who believes they have been subjected to discrimination under Title VI may file a complaint with LADOT or with the U.S. Department of Transportation. For additional information about Title VI or to file a complaint, please visit www.ladottransit.com or call 213-412-8921.

A Title VI complaint form is available at www.ladottransit.com. Written complaints must be filed within 180 days of the date of alleged discrimination.

El Departamento de Transporte de la Ciudad de Los Angeles (LADOT, por sus siglas en inglés) está comprometido a asegurar que ninguna persona sea excluida de participar en los beneficios de sus servicios, o que estos se le nieguen, por motivos de raza, color o nacionalidad, conforme a lo establecido por el Título VI de la Ley de Derechos Civiles de 1964, según su enmienda. Toda persona que considere que ha sido víctima de discriminación conforme a lo establecido en el Título VI puede presentar una queja ante el LADOT o ante el Departamento de Transporte de los Estados Unidos. Para mas información sobre título VI o para someter una queja, por favor visite www.ladottransit.com o llame 213-412-8921. El formulario de quejas conforme al Título VI se encuentra disponible en www.ladottransit.com. Las quejas por escrito deben presentarse dentro de los 180 días de ocurrido el presunto hecho de discriminación.

To request information about civil rights in another language, visit ladottransit.com. Para solicitar información sobre los derechos civiles en otro idioma, visite ladottransit.com. Upang humiling ng impormasyon tungkol sa mga civil right [karapatang sibil] sa ibang wika, dalawin ang ladottransit.com.

Для получения информации о гражданских правах на другом языке посетите вебсайт: ladottransit.com.

Քաղաքացիական իրավունքների մասին այլ լեզվով հնֆորմացիա պահանջելու համար այցելել ladottransit.com.

Để yêu cầu thông tin về quyền công dân bằng ngôn ngữ khác, hãy thăm ladottransit.com.

公民権に関する情報を他言語で入手されたい場合は ladottransit.com をご覧ください。

다른 언어로 작성된 민권에 대한 참고자료를 요청하려면 ladottransit.com 을 방문하십시오.

หากต้องการข้อมูลเกี่ยวกับสิทธิพลเมืองในภาษาอื่น โปรดดูที่เว็บไซต์ ladottransit.com.

ដើម្បីស្នើសុំព័ត៌មានអំពីសិទ្ធិពលរដ្ឋជាភាសាផ្សេងទៀត សូមចូលទៅកាន់ ladottransit.com ។

要索取其他語言的民權法案相關信息，請上網查看ladottransit.com。



LADOT TRANSIT TITLE VI PROGRAM UPDATE 2021

ATTACHMENT E

LADOT TRANSIT'S TITLE VI PLAN ADOPTION AND SIGNATURE PAGE

LADOT TRANSIT TITLE VI PROGRAM UPDATE 2021

APPENDIX 1

LANOW SERVICE EQUITY ANALYSIS



City of Los Angeles Department of Transportation

SERVICE EQUITY ANALYSIS FOR LANOW ON-DEMAND, SHARED-RIDE SERVICE



June 2020



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1 INTRODUCTION

The City of Los Angeles' LADOT Transit Bureau (LADOT Transit) demonstrates new services that respond to unmet travel demand and reduce traffic congestion while ensuring equal access and equity for all residents of the City of Los Angeles. The concept of a service that allows riders to book fully accessible trips based upon their own schedule using a mobile application, calling to book a trip or accessing the service at a designated stop, has proven to be a viable service option that can enhance or extend existing services or, as in this case, lure new riders to transit.

In March 2019, LADOT Transit launched an on-demand, shared-ride accessible service that offers circulation inside of a defined demonstration area and connects riders to the regional transportation network at the Los Angeles County Metropolitan Transportation Authority's (Metro) E Line Palms Rail Station. The on-demand service, branded LAnow, was planned for and is being demonstrated on the city's westside in the communities of Del Rey, Mar Vista, Palms and Venice. This is a new service for an area not previously served by the existing LADOT Transit service network.

LADOT Transit's Major Service Change Policy uses a threshold of 25% change to define actions that constitute a major change subject to a service or fare equity analysis. A new route and/or service exceeds the policy's threshold and therefore requires LADOT Transit to conduct a service equity analysis for the establishment of a new service following a demonstration or pilot service that has lasted 12 months or more.

In accordance with Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration's (FTA) Circular 4702.1B, Title VI Requirement and Guidelines for Federal Transit Administration Recipients, LADOT Transit conducted this analysis to identify and document potential disparate impacts on minority populations or disproportionate burdens on low-income populations resulting from the provision of LAnow service.

2 TITLE VI REGULATORY BACKGROUND AND REQUIREMENTS

In addition to LAnow on-demand service, LADOT Transit operates Commuter Express and DASH fixed route transit services, and Cityride paratransit in the Greater Los Angeles Region that serve a population of 3,949,776.¹ As described in the FTA's Circular 4702.1B-Title VI Requirements and Guidelines for Federal Transit Administration Recipients, any recipient of FTA grants that operates 50 or more fixed route vehicles in peak service in an area with population of 200,000 or more must evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact on minority or low-income populations.

As a recipient of FTA financial assistance, LADOT Transit is obligated to ensure that major service changes, expansions as well as reductions, comply with the requirements of Title VI of the Civil Rights Act of 1964, which affirms that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

LADOT Transit is committed to the equitable distribution of its services and access to its facilities. All DASH, Commuter Express, Cityride and LAnow services are provided impartially without regard to race, color or national origin. LADOT Transit's Disparate Impact and Disproportionate Impact policies are the following:

Minority Disparate Impact Service Changes Policy ("Four-Fifths Rule")

For non-fare related major service changes, a disparate impact may occur when:

- Benefits are provided to minority populations at a rate less than 80% (four-fifths) than the benefits provided to the non-minority population.*
- Adverse impacts from the change are borne by non-minority populations at a rate less than 80% (four-fifths) than the adverse impacts borne by minority populations.*

A disparate impact on routes with span of service or frequency changes will be examined on a cumulative basis by evaluating all changes together. A disparate impact on routes with segment or alignment changes will be examined on an individual basis by evaluating the route changes separately.

¹ Los Angeles City Planning Data 2020/American Community Survey Estimate 2017

Low Income Disproportionate Burden Service Changes Policy (“Four-Fifths Rule”)

For non-fare related major service changes, a disproportionate burden may occur when:

- Benefits are provided to low-income populations at a rate less than 80% (four-fifths) than the benefits provided to the non-low-income population.*
- Adverse impacts from the change are borne by non-low-income populations at a rate less than 80% (four-fifths) than the adverse impacts borne by low-income populations.*

A disproportionate burden on routes with span of service or frequency changes will be examined on a cumulative basis by evaluating all changes together. A disproportionate burden on routes with segment or alignment changes will be examined on an individual basis by evaluating the route changes separately.

The policies were reviewed and approved by the Los Angeles Board of Transportation Commissioners and the Los Angeles City Council in 2014.

3 REASON/ RATIONALE FOR THE PROPOSED SERVICE CHANGE

The westside of Los Angeles has experienced significant commercial and residential growth, which has resulted in high levels of traffic congestion.² The concept of on-demand, micro-transit service was in response to the Del Rey, Mar Vista, Palms and Venice communities that had long requested DASH circulator bus service. The area had not previously been served by the agency’s services except for Commuter Express Route 437, which provides point-to-point weekday commuter service to downtown LA from several stops within the Del Rey area.

The demonstration area does have regional fixed-route service provided by the Los Angeles County Metropolitan Transportation Authority (Metro) and Santa Monica’s Big Blue Bus.

LANOW PROJECT DESCRIPTION

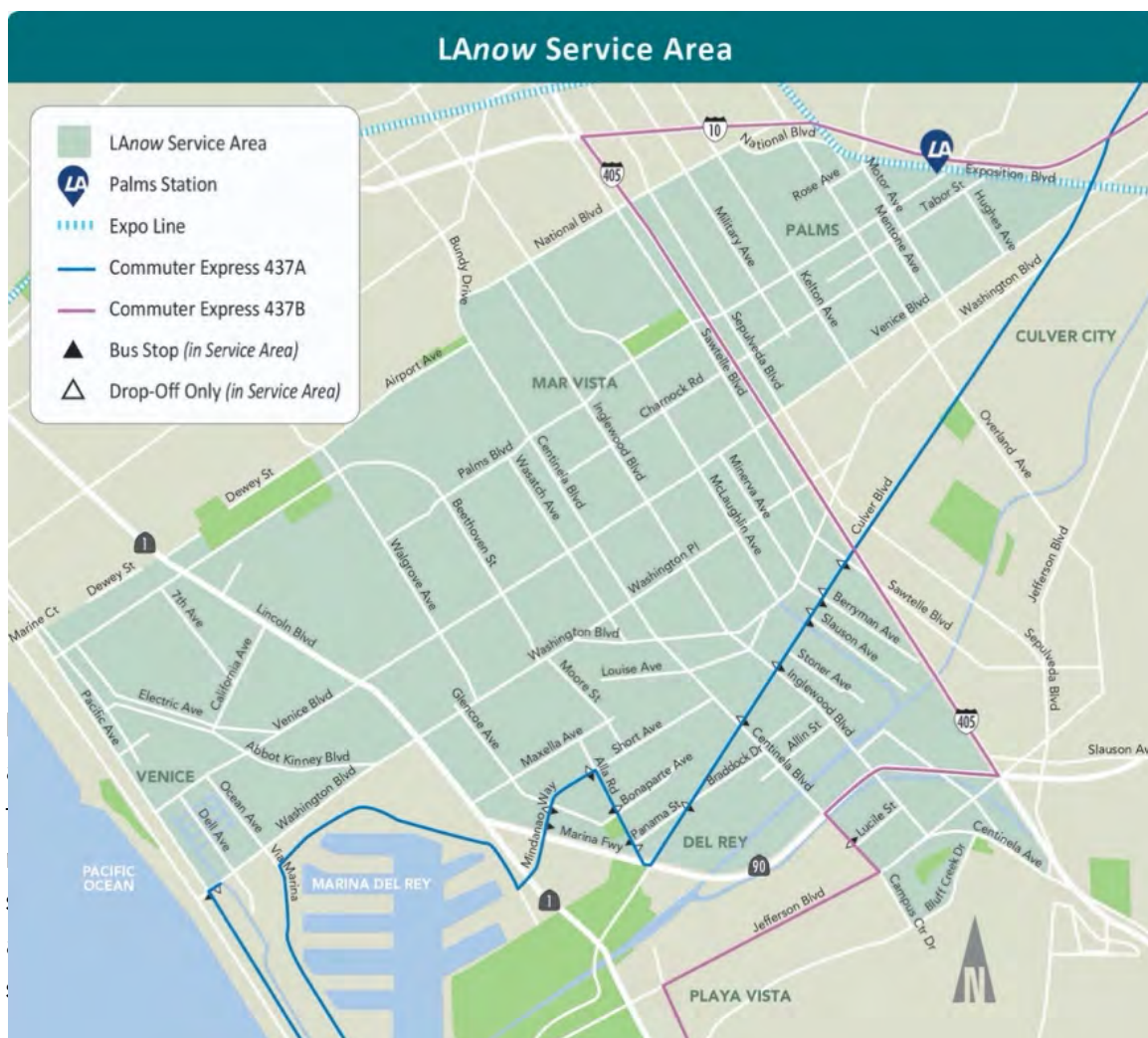
Rather than take a traditional approach with a fixed-route bus service, LANow could provide a type of service where the level can be adjusted to meet demand with a minimum amount of fixed-costs. The LANow service demonstration area was determined by public input gathered by LADOT Transit through outreach efforts and input from Los Angeles City Council Districts 5 and 11, which represent the area. The primary purpose of the service was to provide first and last mile

² USC Annenberg School for Journalism-Crosstown Studies

connection to regional rail service; however, riders tailored the service to meet their own circulation needs inside the demonstration area.

Six vehicles operate during the peak hours and four operate during off-peak hours allowing for LADOT Transit and its service contractor, MV Transportation, to match service levels to demand in an effort to increase service productivity. Over 1000 trips have been taken on the service since its inception and ridership continues to grow. According to passenger surveys done in 2020, the on-demand service has been able to attract discretionary riders as well as those who would have traveled by single-occupant vehicles.

MAP 1 – LAnow Service Area



4 SERVICE EQUITY ANALYSIS

METHODOLOGY

Four neighborhoods make up the LAnow demonstration area: Del Rey, Mar Vista, Palms and Venice. To complete this analysis, LADOT Transit reviewed the City of Los Angeles Department of City Planning 2017 Demographic Profiles of each neighborhood, which sources data from 2013-2017 American Community Surveys (ACS), and boarding data reported from the LAnow trip booking and payment application. LAnow boarding data was used to identify the top ten (10) pick-up and drop-off locations since the service demonstration began.

LANOW SERVICE AREA DEMOGRAPHIC PROFILE

The FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander. The City of Los Angeles is a minority majority city, meaning that the largest part of population (70.1%³) is composed of residents who are American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

The FTA defines a low-income person as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines.⁴ The HHS definition varies by year and household size. For 2020, poverty thresholds range from \$12,760 for a single-person household to \$44,120 for a household of eight. The poverty guideline for a household of four is \$26,200.⁵

³ American Community Survey Estimate-2017

⁴ FTA Circular 4702.1B; Chapter I, Section 5

⁵ US Dept. of Health and Human Services Notice 85 FR 3060; Jan. 17, 2020

Tables 1 and 2 depict the minority and income profiles of the LANow service area.

TABLE 1 – LANow Service Area Minority Profile

Neighborhood	Total Persons	Minority Persons	Minority Percent
Venice	35,806	10,770	30.1%
Palms – Mar Vista Del Rey	115,321	64,304	55.8%
Totals	151,127	75,074	49.7%

Source: 2017 City of LA Dept. of Planning Demographic Profiles

TABLE 2 – LANow Service Area Low-Income Profile

Neighborhood	Total Persons	Persons Below Poverty Level	Percent
Venice	35,806	3,790	10.6%
Palms – Mar Vista Del Rey	115,321	14,607	12.7%
Totals	151,127	18,397	12.2%

Source: 2017 City of LA Dept. of Planning Demographic Profiles

Half of the LANow service area is a minority population and 12.2% live below the poverty level. To better understand the levels of LANow service usage by these populations, in particular low-income populations, LADOT Transit identified the top ten pick up and drop off points. The map on the following page below depicts these points and identifies nearby affordable housing and schools.

MAP 2 – LAnow Top Ten Pick-up/Drop-off Locations



Major Pick-up and Drop-off Locations



Affordable Housing and Schools

- | | | |
|--|--|---|
| 1 Vista Apartments | 16 Tivoli Rainbow Garden Preschool | 30 Redeemer Christian Academy |
| 2 Mar Vista lofts | 17 Daniel Webster Middle School | 31 Clover Avenue Elementary School |
| 3 Washington Courts | 18 Grand View Boulevard Elementary | 32 Charnock Road Elementary School |
| 4 Del Rey Square | 19 Wildwood Elementary School | 33 Venice High School |
| 5 Synergy Corporate Housing | 20 Wildwood Upper and Middle School | 34 Venice Skills Center |
| 6 Grandview Terrace | 21 Beethoven Street Elementary School | 35 Westminster Avenue Elementary School |
| 7 Venice Community Housing | 22 Mar Vista Elementary School | 36 Coeur d'Alene Avenue School |
| 8 New Venice | 23 Mark Twain Middle School | 37 St. Mark School |
| 9 Westminster Villa | 24 Grant Elementary School | 38 Mishkon Tephilo |
| 10 Adda and Paul Safran Senior Housing | 25 John Adams Middle School | 39 Broadway Elementary School |
| 11 Avalon Playa Vista | 26 Palms Elementary School | 40 Stoner Avenue Elementary School |
| 12 Shores | 27 Magnolia Science Academy 6 Palms | 41 Braddock Drive Elementary School and Gifted Magnet |
| 13 Walgrove Avenue Elementary School | 28 The Raymond & Esther Kabbaz High School | 42 Ocean Charter School |
| 14 LAUSD Local District West | 29 Mission: Renaissance West Los Angeles | 43 ICEF Vista Elementary Charter Academy |
| 15 Richland Avenue Elementary School | | |

LAnow performance data has confirmed that on-demand, shared-ride service would be a viable option for other communities with similar travel needs and demographic profiles in the City of Los Angeles.

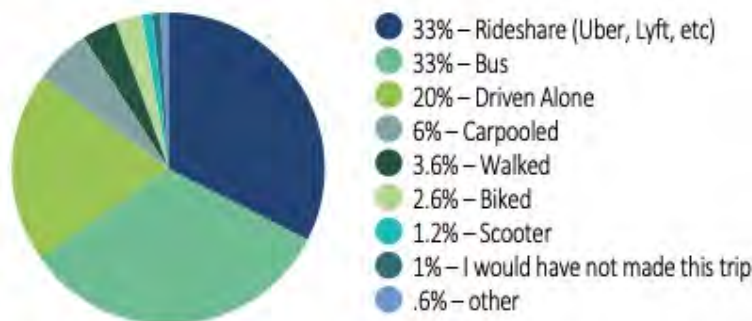
DISPARATE AND DISPROPORTIONATE IMPACTS OF THE PROPOSED SERVICE

LANow is a new service that was introduced as the most effective and efficient mode to meet unmet travel needs in the demonstration area. Prior to the initiation of LANow, the area had fixed-route regional service options provided by Metro, Santa Monica’s Big Blue Bus and LADOT Transit’s Commuter Express that did not accommodate circulation within the four neighborhoods served by the demonstration.

LANow service is a more convenient option for riders who need and want to travel within the demonstration area. As an example, a connecting Metro bus from the Palms Rail Station to Venice would take more than 60 minutes while the LANow service averages half that amount of time. LANow is also competitively priced at \$1.50 a ride compared to a one-way fare on Metro service of \$1.75, or a taxi trip which is \$2.85 just at the flag drop, or a ride-hailing service with a minimum fare of \$3.50.

LANow conducted a survey that demonstrated the ability of the service to change travel habits. The results of the survey, which garnered 500 responses, revealed that over 50% of LANow riders shifted their mode of travel; 20% from driving alone and 33% from UBER, Lyft and other rideshare services.⁶ The following chart depicts rider responses regarding changes in travel habits:

Overall Mode Shift (500 Responses)



The LANow service has earned support from the riding public, leaders of the local communities, elected officials as well as peer agencies. Extensive outreach, especially to minority, low-income and Limited English Proficiency (LEP)

⁶ LANow Rider Survey 2020

populations was carried out with great success raising community awareness and use of the service.

Based upon performance data and comments received from the communities served, LAnow has become an attractive and effective travel option for those living, working or studying in the demonstration area. The introduction of LAnow service creates neither a disparate impact on minorities nor a disproportionate burden on low-income populations.

CONCLUSION

The FTA will allow a transit agency to implement a service change even if the change would have a disproportionately high and adverse impact on minority and low-income populations if the agency demonstrates that its action meets a substantial need in the public interest. LADOT Transit is not in such a situation, as this analysis has revealed that the implementation of LAnow will offer a more convenient and less expensive travel option to minority and low-income populations because of the following:

1. LAnow service offers convenient on-demand travel for any rider within the demonstration area;
2. LAnow's cost per trip is lower than other travel options in the area;
3. Offering options to call or access the service at major stops responds to the needs of those riders who may not have smartphone, sufficient telephone data plans or internet access;
4. Focused outreach efforts to minority and low-income populations will ensure equal access to LAnow service.

Minority and low-income populations in the LAnow service area stand to benefit significantly and equally from having a travel option that provides greater cost and time savings.

PUBLIC PARTICIPATION REQUIREMENTS

For all proposed service changes, LADOT Transit will hold at least one public hearing in every major region of the City of Los Angeles and will publish a minimum of six public notices prior to the hearings in order to receive public comments on the proposed service changes. The first meeting notice will occur at least 30 days prior to the scheduled hearing date, with the second notice being made at least 10 days prior to the scheduled hearing date.

In consideration of the current pandemic and the likelihood of sustained changes to public gatherings, public hearing formats will be adjusted to maintain opportunities for the public to participate in a manner that ensures the safety and well-being of attendees. Public materials will be produced in English and Spanish. LADOT Transit is prepared to stae hearings in person, virtually or using both formats according to health requirements. Additionally, materials will be produced in other languages upon request and according to the geographic location of meeting in order to ensure Limited English Proficient (LEP) populations within the LADOT Transit service area are informed of the proposed service changes and can participate in the discussions.

There are considerable numbers of people who reside in the LAnow demonstration area with Limited English Proficiency (LEP). The primary languages needing LEP support are Spanish and Asian languages.⁷ LADOT Transit has developed its LAnow educational materials in English and Spanish and is currently identifying additional language needs.

In the case of proposed levels of service change at 25% or more, LADOT Transit will conduct a service equity analysis for review by the Los Angeles Board of Transportation Commissioners, the Los Angeles City Council, as well as for the public’s consideration prior to any public hearings.

PUBLIC PARTICIPATION ACTIVITIES

Significant outreach efforts in the community informed the final service design and delivery strategies. That outreach included engagement with low-income and minority populations at the following affordable apartment/housing complexes:

<u>Mar Vista</u>	<u>Venice</u>	<u>Del Rey</u>
Mar Vista Gardens	Venice Community	Del Rey Square
Vista Apartments	Housing	Avalon Playa Vista
Mar Vista Lofts	Adda and Paul Safran	Shores
Grandview Terrace	Senior Housing	

The outreach to these affordable housing complexes resulted in a significant percentage of LAnow ridership as four of these complexes are located within walking distance of the top ten pick-up and drop-off locations for the service.

⁷ Los Angeles City Planning Data 2020/American Community Survey Estimate 2017

Among those living in these affordable housing units are seniors who comprise a significant portion of LAnow's ridership.

In its 2020 fact sheet that profiles enrollment in its schools, the Los Angeles Unified School District reports that 87.9% of its students are minorities and more than 80% of its students live in households at or below the poverty line. LADOT Transit determined that students could be a significant market for the service, especially because a high percentage of students are minorities and/or come from low-income households. As a result of this information, LADOT Transit engaged over two-dozen schools to raise student awareness of the availability of LAnow service:

Mar Vista	Walgrove Avenue Elementary School
Mar Vista	Santa Monica College
Mar Vista	LAUSD Local District West
Mar Vista	Venice High School
Mar Vista	Richland Avenue Elementary School
Mar Vista	Tivoli Rainbow Garden Preschool
Mar Vista	Daniel Webster Middle School
Mar Vista	Grand View Boulevard Elementary
Mar Vista	Wildwood Elementary School
Mar Vista	Wildwood Upper and Middle School
Mar Vista	Beethoven Street Elementary School
Mar Vista	Mar Vista Elementary School
Mar Vista	Mark Twain Middle School
Mar Vista	Grant Elementary School
Mar Vista	John Adams Middle School
Palms	Palms Elementary School
Palms	Magnolia Science Academy 6 Palms
Palms	The Raymond & Esther Kabbaz High School
Palms	Mission: Renaissance West Los Angeles
Palms	Redeemer Christian Academy
Palms	Clover Avenue Elementary School
Palms	Charnock Road Elementary School
Venice	Venice High School
Venice	Venice Skills Center
Venice	Westminster Avenue Elementary School
Venice	Coeur d'Alene Avenue School
Venice	St. Mark School
Venice	Mishkon Tephilo
Venice	Broadway Elementary School
Del Rey	Stoner Avenue Elementary School
Del Rey	Braddock Drive Elementary School and Gifted Magnet

Del Rey	Marina Del Rey Middle School
Del Rey	Ocean Charter School
Del Rey	ICEF Vista Elementary Charter Academy

From 2015 to 2020, employment in the City of Los Angeles grew by 4.7%.⁸ It was determined by LADOT Transit’s outreach activities that the service could meet unmet needs for connections to Metro’s Regional Rail network at the Palms Station. Providing first and last mile connecting service from employment sites to the Palms Station would increase LAnow service productivity. As a result, LADOT Transit also engaged these employers in the demonstration area:

Snap	Direct Partners
ZEFR	UpLoad VR
Maddog Athletics	Twenty20
Stack Commerce	CADFORCE
GOOGLE	GeBBS Healthcare Solutions
JibJab	AmpliPhi Biosciences
Hour Glass Cosmetics	Sony
Amazon Prime	Thrive Market
Bouqs Company	

This engagement resulted in use of LAnow as a connector to the many start-up companies that have located themselves in the demonstration area. GOOGLE’s Venice Beach office is one of the top ten pick up and drop off locations.

⁸ CAO City of Los Angeles Comparative Analysis and Economic Forecast 2015

LADOT TRANSIT TITLE VI PROGRAM UPDATE 2021

APPENDIX 2

DASH TO CLASS FARE EQUITY ANALYSIS



City of Los Angeles Department of Transportation

FARE EQUITY ANALYSIS FOR DASH TO CLASS



May 2020



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APPENDICES

APPENDIX A: DASH TO CLASS FARE TYPE SUMMARY COMPARATIVE ANALYSIS FY2019
vs YTD FY2020

1 INTRODUCTION

In August 2019, the City of Los Angeles Department of Transportation's Transit Bureau (LADOT Transit) began a demonstration of providing free rides for all students enrolled in classes from Kindergarten to Grade Level 12 and College and Vocational schools on its network of Community DASH circulator services. LADOT Transit is proposing to make this free service, known as the DASH to Class Program, permanent based upon the success of the program during the demonstration period.

LADOT Transit intends to continue the demonstration and implement the proposed changes as soon as they have been evaluated by the public, through public hearings and outreach activities, and approved by the Board of Transportation Commissioners and the Los Angeles City Council.

In accordance with Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration's (FTA) Circular 4702.1B, Title VI Requirement and Guidelines for Federal Transit Administration Recipients, LADOT Transit conducted this fare equity analysis to assess if the proposed fare change will have a disparate impact on minority populations or disproportionate burdens on low-income populations resulting from the addition of this free service to LADOT Transit's Fare Policy and Structure.

2 TITLE VI REGULATORY BACKGROUND AND REQUIREMENTS

LADOT Transit operates Commuter Express and DASH fixed route transit services, Cityride paratransit and LAnow on-demand services in the Greater Los Angeles Region that serve a population of 3,949,776¹. As described in the FTA's Circular 4702.1B-Title VI Requirements and Guidelines for Federal Transit Administration Recipients, any recipient of FTA grants that operates 50 or more fixed route vehicles in peak service in an area with population of 200,000 or more must evaluate any fare change and any major service change at the planning and programming stages to determine whether those changes have a discriminatory impact on minority or low-income populations.

As a recipient of FTA financial assistance, LADOT Transit is obligated to ensure that fare changes, increases as well as reductions, comply with the requirements of Title VI of the Civil Rights Act of 1964, which affirms that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from

¹ Los Angeles City Planning Data 2020/American Community Survey Estimate 2017

participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

LADOT Transit is committed to the equitable distribution of its services and access to its facilities. All DASH, Commuter Express, Cityride and LAnow services are provided impartially without regard to race, color or national origin. LADOT Transit’s Disparate Impact and Disproportionate Impact policies are the following:

LADOT Transit’s Minority Disparate Impact Fare Policy

LADOT’s ridership is a minority majority, and any fare adjustment will result in minority populations bearing an impact that will be similar to that of non-minority populations. In consideration of this reality, LADOT will only implement fare adjustments on the basis of substantial legitimate justification demonstrating that the necessity to change fares meets a need that is in the public interest, and that the alternatives would have a more adverse impact than changing fares.

LADOT Transit’s Low Income Disproportionate Burden Fare Policy

Nearly half of LADOT’s ridership is low-income, and predominantly pay their fares with cash. Any increase in cash fares or any decrease in pre-paid fares, such as those offered on smart cards that have lower utilization among low-income persons, can be assumed to be a disproportionate burden for this population. In consideration of this reality, LADOT will only implement fare adjustments on the basis of substantial legitimate justification demonstrating that the necessity to change fares meets a need that is in the public interest, and that the alternatives would have a more adverse impact than changing fares.

The policies were reviewed and approved by the Los Angeles Board of Transportation Commissioners and the Los Angeles City Council in 2015.

3 REASON/ RATIONALE FOR THE PROPOSED FARE CATEGORIES

On August 20th, 2019, Los Angeles Mayor Eric Garcetti announced DASH to Class, a pilot program of the City of Los Angeles Department of Transportation’s LADOT Transit Bureau, that would provide free rides on LADOT Transit’s DASH Circulator Bus Services throughout the City of Los Angeles for all Los Angeles Unified School District (LAUSD) and Los Angeles Community College students.

DASH TO CLASS PROJECT DESCRIPTION

DASH to Class is a pilot program of the City of Los Angeles Department of Transportation's LADOT Transit Bureau that provides year-round free rides on LADOT Transit's DASH Bus Circulator Services for all Los Angeles Unified School District (LAUSD), private, parochial as well as trade and technical college students. In order to access the free ride program, students are required to apply for and obtain a Student Reduced Fare Transit Access Program (TAP) smart card. The Los Angeles County Metropolitan Transportation Authority (Metro) administers all reduced fare programs that are available on the Los Angeles Region's TAP smart card fare payment system including the Student TAP card. Metro assesses student eligibility for the program and issues the TAP card to the eligible student.

The DASH to Class pilot was funded by a grant from State of California's Climate Investments Low Carbon Transit Operations Program (LCTOP), one of several programs that are part of the Transit, Affordable Housing, and Sustainable Communities Program established by the California Legislature in 2014. LCTOP was created to provide operating and capital assistance for transit agencies to reduce greenhouse gas emission and improve mobility, with a priority on serving disadvantaged communities. LADOT Transit will use this grant funding to underwrite the loss of revenue resulting from offering the free fares to students.

The following table outlines the fares paid with a Student TAP card prior to the DASH to Class demonstration:

TABLE 1 – DASH Fare Types Collected from Student TAP Cards

FARE TYPE	CURRENT	PROPOSED
*Electronic Payment Incentive Fare (Regular)	\$0.35	Free
7-Day Rolling Pass (K-12 Student)	\$2.50	Free
7-Day Rolling Pass (College/Vocational Student)	\$2.50	Free
31-Day Rolling Pass (K-12 Student)	\$9.00	Free
31-Day Rolling Pass (College/Vocational Student)	\$9.00	Free

**Single boarding fare discounted from 50 cents to 35 cents when paying with TAP or mobile payment. No student discount available.*

The impact of offering free fares to students on DASH services is expected to be positive, offering benefits for both minority riders and low-income riders. These fare changes are compliant with LADOT Transit's proposed Minority Disparate Impact and Low-income Disproportionate Burden Fare Policies.

4 LADOT TRANSIT DASH RIDERSHIP PROFILE

LADOT Transit has executed onboard research since 1992, which has been updated every three to four years. The most recent onboard survey, completed in 2016, was used to develop the minority and low-income profiles used for this analysis.

Tables 2 and 3 depict the ethnic makeup of and income levels for DASH riders by service type as reported from 2016 Onboard Survey Results.

TABLE 2 – DASH Race/Ethnicity

Race/Ethnicity	DASH Downtown	Community DASH
Asian/Pacific Islander	21%	7%
Black/African American	13%	15%
Latino	47%	67%
Native American	1%	1%
Other	4%	2%
White/Caucasian	14%	8%

Source: LADOT Transit DASH Downtown and Community DASH Onboard Survey Results 2016

TABLE 3 – DASH Household Income Levels

Household Income Levels	DASH Downtown	Community DASH
\$100,000 or more	17%	2%
\$70,000-\$100,000	12%	2%
\$60,000-\$69,999	7%	2%
\$50,000-\$59,999	8%	26%
\$40,000-\$49,999	9%	6%
\$30,000-\$39,999	7%	11%
\$20,000-\$29,999	11%	18%
\$10,000-\$19,999	14%	23%
Less than \$10,000	13%	31%

Low-income
threshold

Source: LADOT Transit DASH Downtown and Community DASH Onboard Survey Results 2016

The FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander. The City of Los Angeles is a minority majority city, meaning that the largest part of population (70.1%²) is composed of residents who are American Indian or Alaska Native, Asian, Black or African American, Hispanic or

² American Community Survey Estimate-2017

Latino, or Native Hawaiian or other Pacific Islander. According to 2016 onboard survey data, 84% of DASH riders are minorities.

The FTA defines a low-income person as a person whose median household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines³. The HHS definition varies by year and household size. For 2020, poverty thresholds range from \$12,760 for a single-person household to \$44,120 for a household of eight. The poverty guideline for a household of four is \$26,200⁴.

The 2016 Onboard Surveys conducted on DASH services included an income question that offered riders options of household income in increments ranging from, "Less than \$10,000," to "Over \$100,000." For the purpose of this analysis, the data collected in categories of "\$20,000 to \$29,999," and lower will be considered low-income. While onboard survey data reports 42% of system-wide riders are low-income, more than half of DASH riders are low-income at 54%.

Prior to the initiation of the DASH to Class Program, students comprised 12.5%⁵ of all DASH riders. Students used Student 7 and 31-Day passes, discounted 50% from regular fare passes, available only on the Metro-issued Student TAP card. In addition to these two fare products, students also used TAP card stored value at a rate of 35 cents per boarding; this fare type is discounted from the 50 cents cash fare as part of LADOT Transit's Electronic Fare Incentives and is widely available on regular TAP cards as well.

Student ridership numbers were derived from a summary report of fares collected from Student TAP cards between July 2018 and January 2020. Students were still required to board with the Metro-issued Student TAP card; however, the program was announced shortly before the school year began creating a surge in applications. To ensure that students could ride for free as soon as possible, LADOT Transit allowed students to show a valid student ID to ride DASH service at no charge while their applications for Student TAP cards were being processed. Boardings with student IDs were entered manually by bus operators into the Driver Control Units (DCUs) as unpaid fares, categorically reported with other types of unpaid fares as "No Fare Received." These boardings were estimated as the

³ FTA Circular 4702.1B; Chapter I, Section 5

⁴ US Dept. of Health and Human Services Notice 85 FR 3060; Jan. 17, 2020

⁵ LADOT Transit Onboard Survey 2016

increase in unpaid fares from FY19 to FY20. They are identified in this report's tables as "Student ID (no TAP card)."

Table 4 compares DASH student ridership between the months of September and January for fiscal years 2019 and 2020 and estimates the number of minority and low-income riders based on the results of 2016 onboard survey results.

TABLE 4 – DASH Student Ridership Comparison Sept. to Jan. FY19 vs. FY20

Fare Type	Cost	Sept. to Jan. FY19	Minority Ridership	Low-income Ridership
Single Trip Fare	\$0.35	13,224	11,108	7,141
7-Day DASH Student	\$2.50	239	201	129
31-Day DASH Student	\$9	36,004	30,243	19,442
Grand Totals		49,467	41,552	26,712
Fare Type	Cost	Sept. to Jan. FY20	Minority Ridership	Low-income Ridership
DASH to Class Free Fare	Free	117,819	98,968	63,622
7-Day DASH Regular	\$2.50	4	3	2
31-Day DASH Student	\$9	877	737	474
Student ID (no TAP card)	\$0	100,784	84,659	54,423
Grand Totals		219,484	184,367	118,521

Sources: DASH to Class Fare Type Summary Comparative Analysis FY2019 vs YTD FY2020; LADOT DASH Downtown and Community DASH Onboard Survey Results 2016- 84% Minority; 54% Low-Income.

While student period passes (7 and 31-Day) were removed from the fare table and from sales outlets on August 1, 2019, the remaining usage of period passes is attributed to those that were purchased prior to this date and retained by riders.

5 FARE EQUITY ANALYSIS

The DASH to Class Program is the second reduced fare program that LADOT Transit has introduced in the past five years. In 2015, LADOT Transit implemented an Electronic Payment Incentive Fare that provided 30% discounts to DASH riders who paid their fares using the regional TAP smart card or LA Mobile, LADOT Transit's mobile fare payment application. That program included further discounts for senior, disabled and student riders up to 50% of regular fares.

LADOT Transit has proposed to offer free rides on DASH services to students using grant funding to compensate for the lost revenue. The analysis of this fare change was conducted in compliance with Federal Transit Administration (FTA) Circular 4702.1B, which requires under Title VI of the Civil Rights Acts of 1964 that LADOT Transit evaluate significant fare changes and proposed improvements at

the planning and programming stages to determine whether those changes have a discriminatory impact on minority and low-income populations. In its Title VI submittal, LADOT Transit will provide a copy of the equity evaluation for these and any other fare changes implemented after the last submission in 2018.

METHODOLOGY

The data used for this analysis were derived from the 2016 Onboard Survey Results for DASH Downtown and Community DASH. LADOT Transit’s DASH to Class Fare Type Summary Comparative Analysis FY2019 vs YTD FY2020 was used to estimate usage for fare types. This data set is included as Appendix A. The fare type data contained in the comparative analysis was collected from onboard validations of Student TAP cards. Boardings for students who boarded using only a student ID were estimated from Driver Control Unit entries for “No Fare Received.” For the purpose of this analysis, the consolidated data in Table 4 – DASH Student Ridership Comparison Sept. to Jan. FY19 vs. FY20 was used to compare the change in fare type usage by students overall and by minority and low-income populations.

Table 5 depicts the level of student ridership prior to the DASH to Class pilot by fare type for the period of September 2018 to January 2019 in FY2019. The table also presents usage of each fare type by the following student population categories:

1. Overall: The total number of student riders, both K to 12 and College/Vocational.
2. Minority: Based on 2016 onboard research, the estimated percent of total student riders that are minorities.
3. Low-income: Based on 2016 onboard research, the estimated percent of total student riders that are low-income.

TABLE 5 – Fare Type Usage Prior to Pilot Program

USAGE FY2019 SEPTEMBER TO JANUARY				
Fare Type	Fare	Usage by Group		
	Existing	Overall	Minority	Low-Income
Single Trip Fare (Regular)	\$0.35	27%	23%	14%
7-Day Rolling Pass (Student)	\$2.50	0.5%	0.4%	0.3%
31-Day Rolling Pass (Student)	\$9.00	73%	61%	39%

Source: Table 4 – DASH Student Ridership Comparison Sept. to Jan. FY19 vs. FY20

Prior to the start of the DASH to Class pilot program, 7-Day and 31-Day Student passes were removed from the fare table and no longer available for sale. Stored value deductions from Student TAP cards for single trips were also shut off. DASH to Class free rides were recorded as single trips each time a student boarded and validated their Student TAP card on the validator. A low percentage of trips were recorded as 7 and 31 day passes likely because some students had purchased multiple passes before the program started. There was no option to return, credit or transfer any previously purchased passes, so riders continued to use them. Once all remaining passes are fully collected, the student can then continue to use the Student TAP card to ride for free.

Table 6 depicts the level of student ridership after the DASH to Class pilot by fare type for the period of September 2019 to January 2020 in FY2020.

TABLE 6 – Fare Type Usage During DASH to Class Pilot Program

USAGE FY2020 SEPTEMBER TO JANUARY				
Fare Type	Fare	Usage by Group		
	Existing	Overall	Minority	Low-Income
DASH to Class (Single Trip)	Free	54%	45%	29%
7-Day Rolling Pass (Student)	Free	<0.1%	<0.1%	<0.1%
31-Day Rolling Pass (Student)	Free	0.4%	0.3%	0.2%
Student ID (no TAP card)	\$0.00	46%	39%	25%

Source: Table 4 – DASH Student Ridership Comparison Sept. to Jan. FY19 vs. FY20

Table 7 depicts the change between existing and proposed fare tables, as well as the change from September to January for fiscal years 2019 and 2020 in the level of usage for each fare type by student riders overall, minority and low-income. The levels of usage by group increase uniformly due to the estimation of minority and low-income populations on static percentages. The dramatic increase in the category “Single Trip Fare” is attributable to student ridership doubling and to DASH to Class trips being counted as single trips.

TABLE 7 – Change in Student Ridership by Fare Type After DASH to Class Pilot

RESULTING CHANGE SEPTEMBER TO JANUARY FY19 VS FY20							
Fare Type	Fare		Change		Change in Usage by Group		
	Existing	Proposed	Absolute	Percentage	Overall	Minority	Low-Income
Single Trip Fare (Regular)	\$0.35	Free	-\$0.35	-100%	791%	791%	791%
7-Day Rolling Pass (Student)	\$2.50	Eliminated	N/A	N/A	-98%	-99%	-99%
31-Day Rolling Pass (Student)	\$9.00	Eliminated	N/A	N/A	-98%	-98%	-98%
Student ID (no TAP card)	\$0.00	\$0.00	None	N/A	N/A	N/A	N/A

Source: Table 4 – DASH Student Ridership Comparison Sept. to Jan. FY19 vs. FY20

DISPARATE AND DISPROPORTIONATE IMPACTS OF THE PROPOSED FARE CATEGORIES

The DASH to Class program is intended to provide student riders greater access to transit by offering them free fares. LADOT Transit requires this benefit to be administered through the Student TAP card for the purpose of accurately tracking and reporting ridership. The overall number of student riders more than tripled during the study period rising from 49,467 to 219,484. In the first five months of DASH to Class, over 99% of students rode for free; an estimated 46% of trips were made with student IDs rather than the Student TAP card.

The level of minority populations is consistently the majority throughout DASH routes, so it can be assumed that the majority of the population of increased student ridership are minorities. And because the program is free and is funded through a grant, any barriers associated with the cost of fares are removed and the burden of recovering lost fare revenue is not shifted onto other riders. These statements would indicate that the fare changes associated with the program will likely not have a disparate impact on minorities, nor a disproportionate burden on low-income persons. Instead, the program yields a positive impact by increasing access to transit at no cost, clearly indicated by 58% more overall Student TAP card boardings.⁶

DASH to Class does require students to apply for and obtain the reduced fare Student TAP card, but students without the TAP card have been allowed to board with just their student IDs. Riders boarding with student IDs are informed by bus operators that they must obtain the reduced fare Student TAP card and are referred to onboard applications or the LADOT Transit Customer Service Center. Boardings with a student ID account for a large portion of DASH to Class ridership, which has the potential to create a disparate impact because there is a value

⁶ Table 4 – DASH Student Ridership Comparison Sept. to Jan. FY19 vs FY20

associated with the time and effort that students and parents, for those riders under 18, put into applying for the Student TAP card and its benefits. Additionally, boardings with non-fare media that cannot be validated electronically, such as photo IDs, are often associated with higher levels of fare evasion.

While the expectation is for student ID boardings to decrease as Student TAP cards are distributed, LADOT Transit recognizes this potential disparate impact and has identified two issues associated with students obtaining Student TAP cards that it will address. First, the timeframe from when the program was announced to its start was short and resulted in a surge of students applying for a Student TAP card. Second, the overwhelming majority of student riders are K-12 students who are under 18 and whose applications require a parent signature. To address these issues and mitigate the potential disparate impact, LADOT Transit will expand its current outreach efforts to schools and colleges to include collaboration with student programs and resources, school administrators, and parent and teacher organizations. Outreach will be done consistently throughout the school year with increased efforts in the months leading up to a new school year or semester. The focus of collaborative efforts will be targeted to support completing applications for students under 18 years of age. In addition to its outreach efforts, LADOT Transit will continue to explore opportunities to make the program easier to administer, easier for students to enroll and easier to track.

PUBLIC PARTICIPATION REQUIREMENTS

For all proposed fare changes, LADOT Transit will hold at least one public hearing in every major region of the City of Los Angeles and will publish a minimum of six public notices prior to the hearings in order to receive public comments on the proposed fare changes. The first meeting notice will occur at least 30 days prior to the scheduled hearing date, with the second notice being made at least 10 days prior to the scheduled hearing date.

In consideration of the current pandemic and the likelihood of sustained changes to public gatherings, public hearing formats will be adjusted to maintain opportunities for the public to participate in a manner that ensures the safety and well-being of attendees. Public materials will be produced in English and Spanish. Additionally, materials will be produced in other languages upon request and according to the geographic location of meeting in order to ensure Limited English Proficient (LEP) populations within the LADOT Transit service area are informed of the proposed fare changes and can participate in the discussions.

In every case of proposed fare changes, LADOT Transit will conduct a fare equity analysis for review by the Los Angeles Board of Transportation Commissioners, the Los Angeles City Council, as well as for the public's consideration prior to any public hearings.

REQUIRED SUPPORT FOR THE PROPOSED FARE CATEGORIES

In order for the DASH to Class program to be successful, LADOT Transit will ensure that Student TAP cards are readily available to minority and low-income riders through a robust outreach and distribution effort. LADOT Transit is committed to ensuring that these populations are made aware of the program through focused marketing that takes into consideration communications to those with Limited English Proficiency (LEP).

LADOT Transit has mounted a significant outreach effort to schools and colleges with the collaborative support of school administrators, and parent and teacher organizations. These outreach efforts help ensure that minority and low-income populations will be made aware of the availability of the free transportation opportunity for students. The current marketing campaign to raise awareness of the DASH to Class program includes the following mediums:

- Transit advertising
- Informational program materials for distribution including applications
- Informational displays
- Social media announcements
- Dedicated webpage: <https://www.ladottransit.com/studentsridefree/>

CONCLUSION

The FTA will allow a transit agency to implement a fare change even if the change would have a disproportionately high and adverse impact on minority and low-income populations if the agency demonstrates that its action meets a substantial need in the public interest. LADOT Transit is not in such a situation, as this analysis has revealed that the fare changes associated with the DASH to Class program will have a positive impact on minority and low-income populations because of the following:

1. The program's free fares increase student access to transit by removing any financial barrier;
2. The program's allowance for travel year-round on all DASH services increases access to opportunities beyond school;



3. Expanded and continuing outreach efforts will support students in obtaining Student TAP cards.

Minority and low-income populations will be afforded multiple benefits through the DASH to Class program.

APPENDIX A

DASH TO CLASS FARE TYPE SUMMARY COMPARATIVE ANALYSIS FY2019 vs YTD FY2020

DASH TO CLASS PROJECT

Analysis - FY2019 vs Year-to-Date FY2020

FY2019	Sep	Oct	Nov	Dec	Jan	Grand Total
31D DASH Student	7,438	9,602	6,569	4,699	5,278	33,586
7D DASH Student	37	64	43	9	26	179
SV Student	2,218	2,769	2,403	1,804	1,944	11,138
Grand Total	9,693	12,435	9,015	6,512	7,248	44,903
FY2020	Sep	Oct	Nov	Dec	Jan	Grand Total
31D DASH Student	477	250	69	57	17	870
7D DASH Student			2			2
SV Student	17,186	25,895	20,167	20,737	20,221	104,206
Grand Total	17,663	26,145	20,238	20,794	20,238	105,078
Difference:						60,175
% Diff FY20 vs 19	82%	110%	124%	219%	179%	134%

FY2019	Sep	Oct	Nov	Dec	Jan	Grand Total
31D DASH College	502	633	498	357	428	2,418
7D DASH College	7	49	4			60
SV College	412	512	376	363	423	2,086
Grand Total	921	1,194	878	720	851	4,564
FY2020	Sep	Oct	Nov	Dec	Jan	Grand Total
31D DASH College			7			7
7D DASH College			2			2
SV College	2,596	3,228	2,221	2,637	2,931	13,613
Grand Total	2,596	3,228	2,230	2,637	2,931	13,622
Difference:						9,058
% Diff FY20 vs 19	182%	170%	154%	266%	244%	198%

FY2019	Sep	Oct	Nov	Dec	Jan	Grand Total
No Fare Received	22,090	25,733	24,733	23,213	25,838	121,607
FY2020	Sep	Oct	Nov	Dec	Jan	Grand Total
No Fare Received	45,897	50,254	36,857	42,609	46,774	222,391
Difference:						100,784
% Diff FY20 vs 19	108%	95%	49%	84%	81%	83%

Student/College
Reduced Fare Users
Increase

69,233

Total DASH to Class
Ridership

219,484

DASH TO CLASS PROJECT

Analysis - FY2019 vs Year-to-Date FY2020

FY2019	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Grand Total
31D DASH Student	2,891	6,120	7,438	9,602	6,569	4,699	5,278	6,815	7,911	5,899	7,290	3,867	74,379
7D DASH Student	29	45	37	64	43	9	26			4	14	25	296
SV Student	1,226	1,722	2,218	2,769	2,403	1,804	1,944	2,329	2,404	2,133	2,564	1,543	25,059
Grand Total	4,146	7,887	9,693	12,435	9,015	6,512	7,248	9,144	10,315	8,036	9,868	5,435	99,734
FY2020	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Grand Total
31D DASH Student	2,689	1,069	477	250	69	57	17						4,628
7D DASH Student	9				2								11
SV Student	1,571	5,649	17,186	25,895	20,167	20,737	20,221						111,426
Grand Total	4,269	6,718	17,663	26,145	20,238	20,794	20,238						116,065
% Diff FY20 vs 19	3%	-15%	82%	110%	124%	219%	179%						

FY2019	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Grand Total
31D DASH College	439	470	502	633	498	357	428	400	349	284	290	244	4,894
7D DASH College	11	17	7	49	4					3	4	3	98
SV College	333	368	412	512	376	363	423	426	517	604	468	585	5,387
Grand Total	783	855	921	1,194	878	720	851	826	866	891	762	832	10,379
FY2020	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Grand Total
31D DASH College	330	140			7								477
7D DASH College	19				2								21
SV College	653	1,417	2,596	3,228	2,221	2,637	2,931						15,683
Grand Total	1,002	1,557	2,596	3,228	2,230	2,637	2,931						16,181
% Diff FY20 vs 19	28%	82%	182%	170%	154%	266%	244%						

FY2019	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Grand Total
No Fare Received	26,112	25,277	22,090	25,733	24,733	23,213	25,838	22,699	27,507	55,567	32,155	30,404	341,328
FY2020	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Grand Total
No Fare Received	32,608	52,788	45,897	50,254	36,857	42,609	46,774						307,787
% Diff FY20 vs 19	25%	109%	108%	95%	49%	84%	81%						

LADOT TRANSIT TITLE VI PROGRAM UPDATE 2021

APPENDIX 3

LANGUAGE ASSISTANCE PLAN

AVAILABLE AT: https://www.ladottransit.com/pdf/CityofLA_LEP.pdf