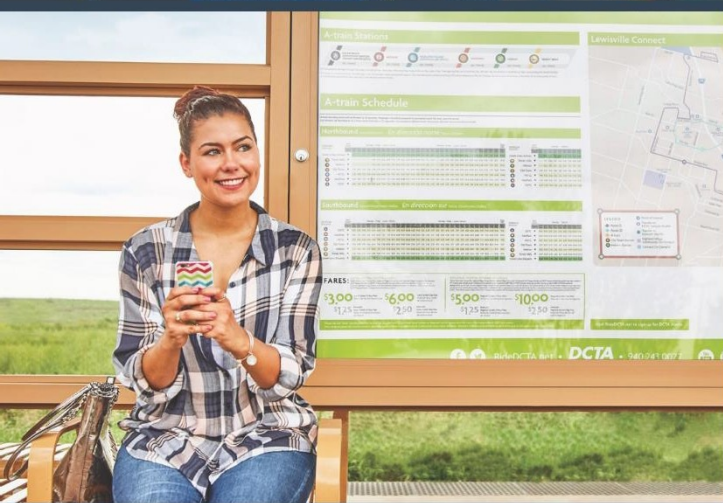




DENTON COUNTY
TRANSPORTATION AUTHORITY



DCTA TITLE VI PROGRAM

April 28, 2022



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1. Introduction

This update of the Denton County Transportation Authority's (DCTA) Title VI program has been prepared to ensure that the level and quality of DCTA's services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to all DCTA's riders and other community members regardless of race, color, national origin, or income status. Additionally, through this program, DCTA has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

The program outlined herein contains all elements required of a transit provider operating in an urban area of 200,000 or more in population with less than 50 vehicles operating in peak service in accordance with FTA Advisory Circular 4702.1B Ch IV, Section 4. This program supersedes DCTA's previous Title VI Program, is effective as of June 1, 2022, was adopted April 28, 2022, and addresses activities since June 2019. This document was prepared using data provided by the United States Census Bureau, the North Central Texas Council of Governments, and DCTA community surveys. DCTA operations staff, community stakeholders, and passengers have provided additional anecdotal data. Appendix A presents documentation that the DCTA Board of Directors reviewed and approved this Title VI Program.

DCTA's Commitment to Civil Rights

It is a matter of principle, policy, and practice that DCTA is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in the receipt of any of DCTA services on the basis of race, color, or national origin. The content of this program has been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964, Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency [LEP]), and Federal Transit Administration (FTA) Circular 4702.1B, dated October 1, 2012:

Title VI of the Civil Rights Act of 1964, as amended, protects any person in the United States on the grounds of race, color, or national origin from being excluded from participation, being denied the benefits of, or being otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the U.S. Department of Transportation (USDOT).

As a regular direct recipient of federal funds under the programs of the FTA and USDOT and pursuant to the federal requirements referenced above, DCTA clearly understands its responsibility and obligation to ensure equitable access and opportunity for participation in the planning and decision-making process. These responsibilities and obligations assure that:

- The benefits of its transit services are shared equitably throughout the service area.
- The level and quality of transit services are sufficient to provide equal access to all riders in its service area.
- No one is precluded from participating in DCTA's service planning and development process.
- Decisions about service changes or facility locations are made without regard to race, color, or national origin.
- Development and urban renewal, which benefit a community, will not unjustifiably be acquired through the disproportionate allocation of adverse environmental and health burdens on any minority population.

- A program is in place for correcting any discrimination, whether intentional or unintentional.

DCTA regularly engages the public in the development of its programs and policies, including its Title VI Program, Public Involvement Program, LEP Program, and its Service and Performance Standards.

Agency Overview

The Texas Legislature created DCTA in 2001 to accelerate transportation solutions critical to reducing traffic congestion and enhancing air quality, while contributing to orderly growth and development and improving the quality of life for current and future residents of Denton County, Texas. Authorized by 70 percent of Denton County voters in 2002 and funded in 2003 by a dedicated sales tax from the cities of Denton, Lewisville, and Highland Village, DCTA fulfilled its initial service plan in 2011. In March 2012, the Agency adopted its updated service plan to include system-wide improvements that build on the initial investments and meet the needs associated with future growth. In March 2012, the Agency adopted system wide performance and design standards to guide future service changes, capital investments, and system expansions. In 2020 and 2021, the Agency removed several fixed-routes and significantly expanded coverage through implementation of new on-demand service, GoZone. Figure 1 depicts DCTA's 2010 urbanized area (UZA), Denton-Lewisville, and adjacent UZAs. Figure 2 shows the population density within Denton and Collin Counties by U.S. Census block groups¹.

¹ For the purposes of this document, DCTA's service area will be defined as all of Denton and Collin Counties.

Figure 1. DCTA Service Area Context.

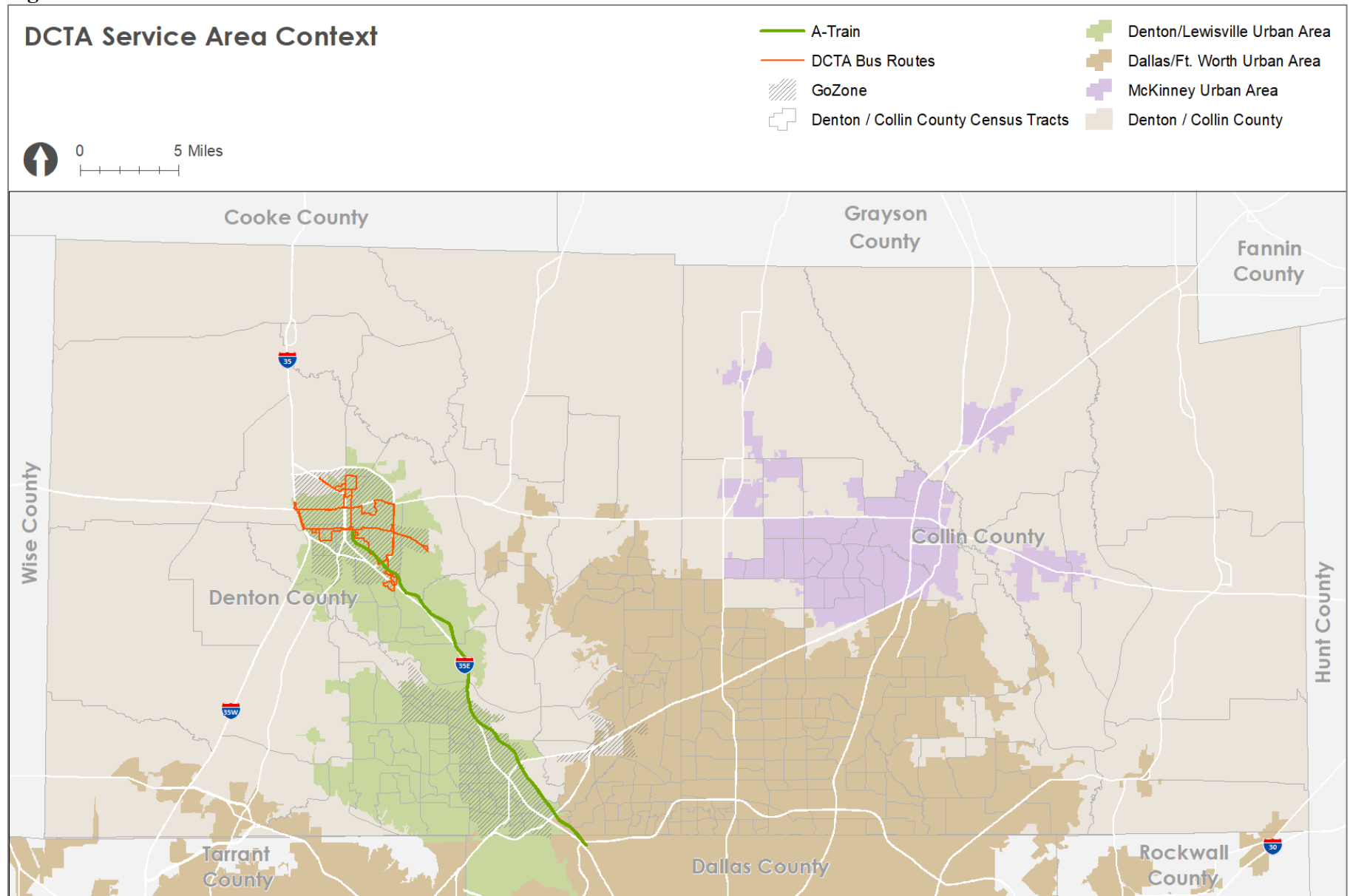
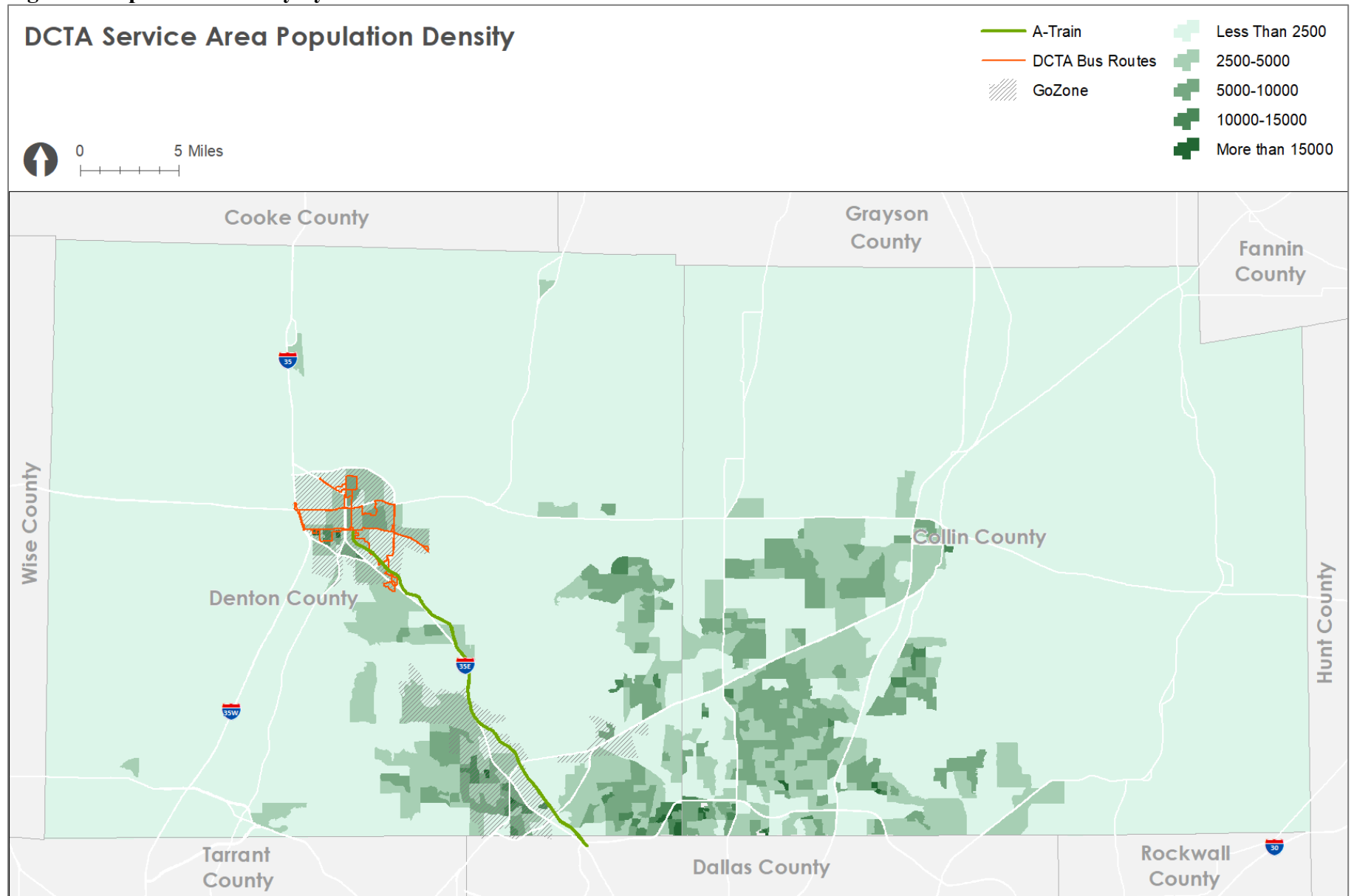


Figure 2. Population Density by Census Tract with DCTA Fixed Routes.



System Overview

DCTA provides transit services within Denton and Collin Counties. DCTA operates eight fixed routes, a 21-mile commuter rail system, on-demand zone services, limited stop shuttle services, demand response/paratransit services, and vanpool services. DCTA also manages contracted services for the University of North Texas (UNT) and the cities of Frisco and Coppell. DCTA's 31 peak-service bus vehicles, four peak-service rail vehicles, and 175 employees and contracted employees serve about one million passengers annually. The transit system serves three colleges or universities, connects to regional transit networks, and serves key employment, healthcare, and government centers.

Local Fixed-Route Services

DCTA operates eight fixed routes in Denton. The routes operate Monday through Saturday. In Denton, peak frequencies vary depending on the route (30–45-minute headways). Off-peak frequencies in Denton also vary by route (40–60-minute headways).

Commuter Rail Service

The A-train, DCTA's commuter rail line, operates Monday through Saturday excluding holidays and serves six rail stations including a station that DCTA shares with Dallas Area Rapid Transit (DART). The A-train, which averages approximately 500 passengers² a day, operates 30-minute frequencies during the peak period and approximately 60-minute frequencies in the off-peak period.

On-Demand Zone Services

DCTA has partnered with Via to provide two on-demand zone services, known as GoZones. The Denton GoZone provides service in Denton with connections to key destinations such as the Golden Triangle Mall, Downtown Denton Transit Center, and Rayzor Ranch Marketplace. The Lewisville/Highland Village GoZone connects residents to major retail and recreation centers in Lewisville such as Music City Mall Lewisville, Wayne Ferguson Plaza, and Lewisville Towne Crossing. The Denton and Lewisville/Highland Village GoZones both operate Monday through Thursday from 5 a.m. to 10 p.m., Friday from 5 a.m. to 11 p.m., Saturdays from 8 a.m. to 11 p.m., and Sundays/major holidays from 8 a.m. to 6 p.m. For night safety, DCTA offers a "Guaranteed Ride Home" GoZone program which allows travel from the DART Trinity Mills Station to any GoZone destination between 10 p.m. and 1 a.m. from Monday through Thursday and between 11 p.m. and 2 a.m. on Fridays and Saturdays.

Limited-Stop Shuttle Service

In September 2016, DCTA launched the North Texas Xpress in coordination with Trinity Metro that operates Monday through Friday. This route operates twice a day on weekdays, at approximately 6 a.m. and 5 p.m. (excluding major holidays). The commuter shuttle serves several points along the I-35W corridor, has two park and ride options, and provides connectivity to employment centers. The limited-stop commuter shuttle provides connections to the Trinity Railway Express (TRE), University of North Texas (UNT) campus shuttles, and local DCTA fixed routes.

ADA/Demand Response

DCTA provides ADA/paratransit service in Denton and Lewisville and elderly and disabled demand-response service in Denton, Lewisville, and Highland Village. Figure 3 shows the percent of the

² Approximately 1,500 passengers per day before the COVID-19 pandemic

population with a disability, and Figure 4 shows the percent of the population that is 65 years of age or older.

Vanpools

DCTA partially subsidizes a monthly vanpool service for groups of 6 to 15 people for trips that either begin or end in Denton or Wise Counties. DCTA offers a “Guaranteed Ride Home” program for vanpool participants as well. This program provides an individual with a subsidized ride home in case of an emergency or unexpected overtime on a day the person vanpooled to work.

Contract Services

DCTA operates contracted service for campus shuttle systems in partnership with UNT which offers connectivity to the local fixed route bus system and A-train. The UNT Shuttle includes 12 routes that operate in Denton, Monday through Friday, during the academic year. Limited service is offered on Saturdays, Sundays, and during summer and winter breaks. The campus shuttle systems are open to the general public with appropriate fare. DCTA also partners with Lyft and UNT to offer students, faculty, and staff free rides on campus from 2 a.m. to 7 a.m. daily.

In October 2019, DCTA, in partnership with the City of Coppell and Lyft, provides local employees first-and-last-mile transportation by offering discounted Lyft rides from several public transit stops to a destination within appropriate workforce zones. Employees can use this service daily from 4 a.m. to 12 a.m. (midnight), excluding major holidays.

On behalf of the City of Frisco, DCTA provides curb-to-curb demand response transit service, as well as subsidized taxi services, to eligible Frisco residents for trips within Frisco and designated portions in the City of Plano. This service is available Monday through Friday from 6 a.m. to 6 p.m., excluding major holidays.

Figure 3. Persons with Disability.

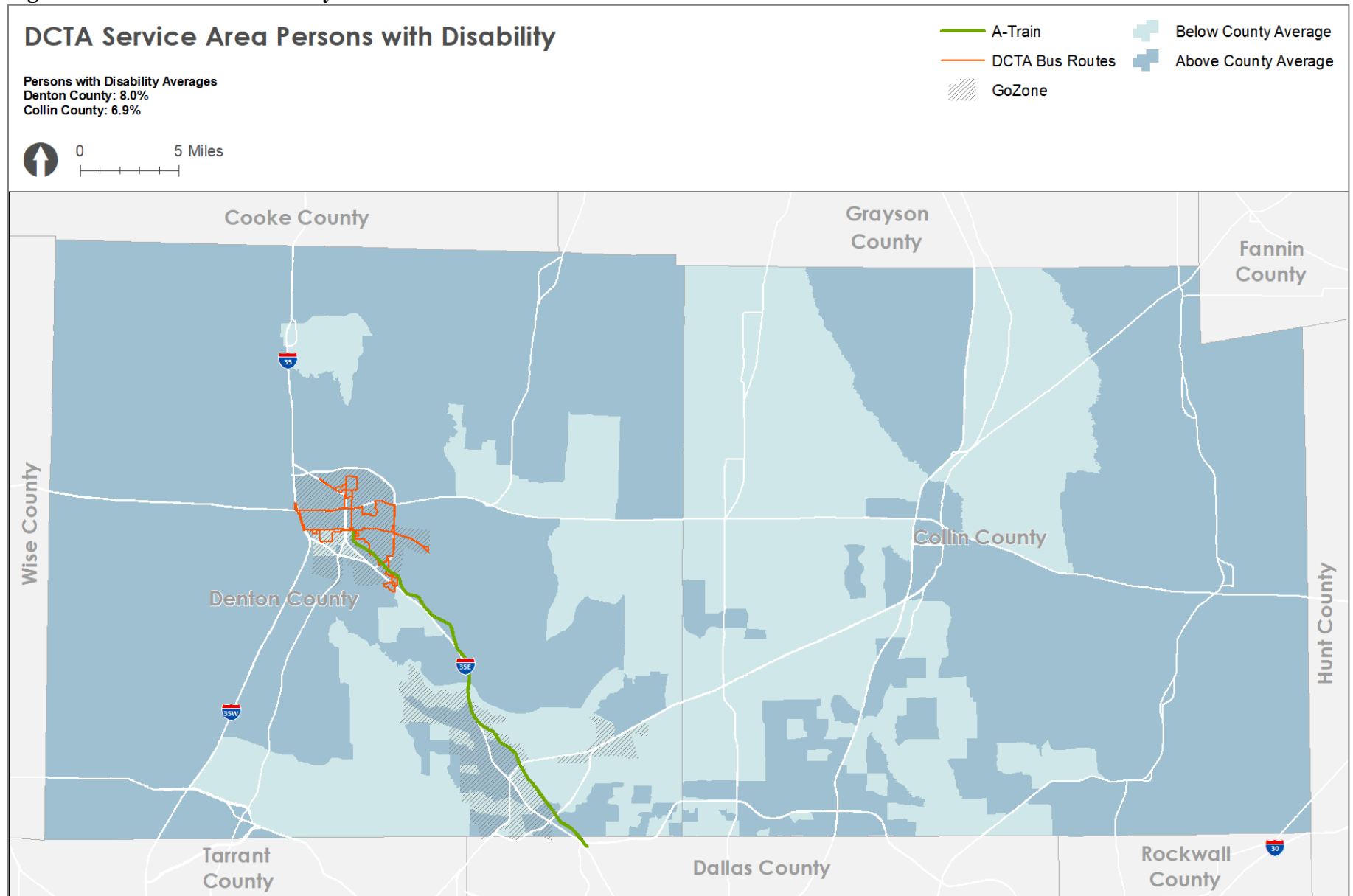
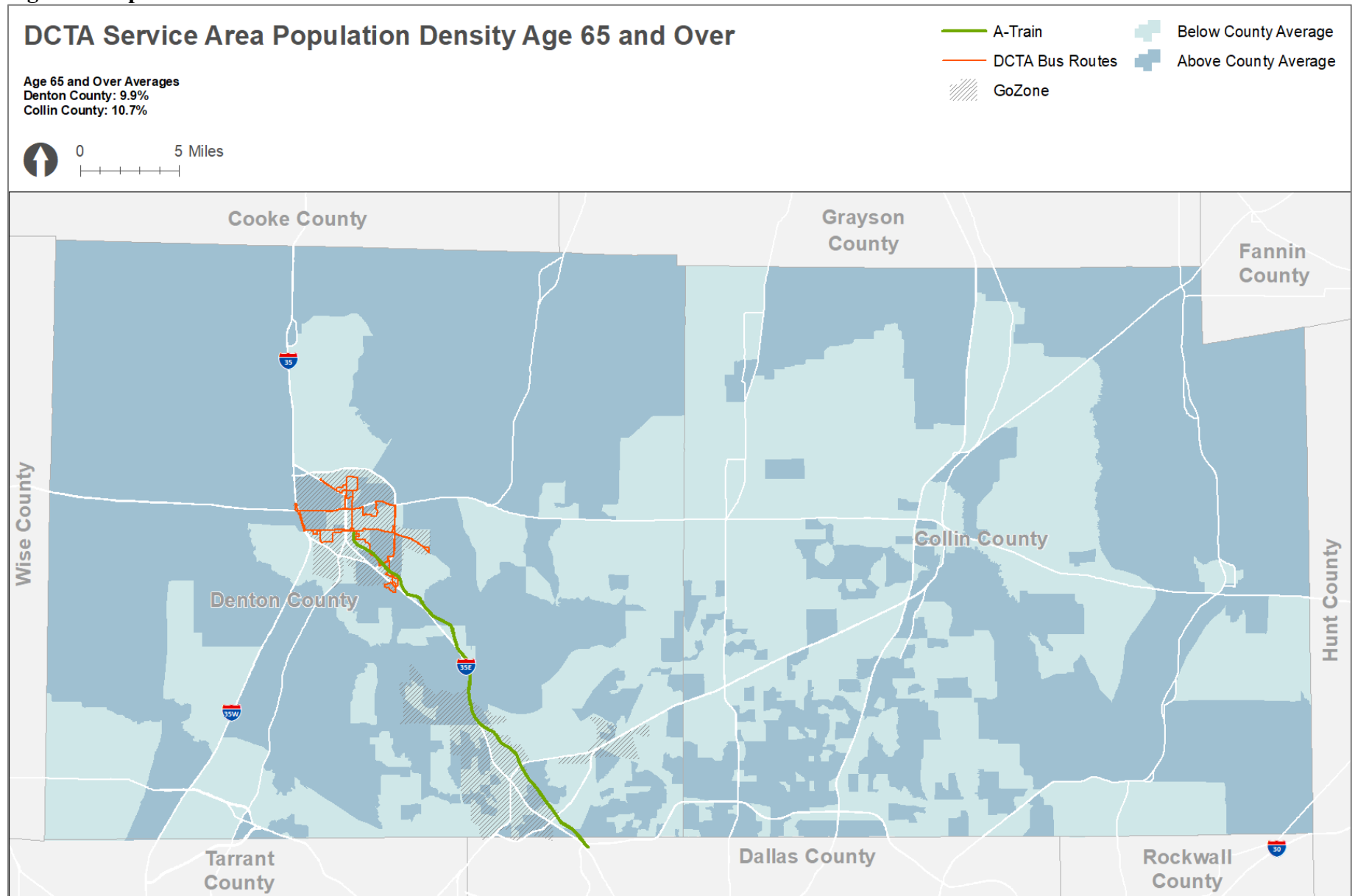


Figure 4. Population 65 Years and Older.



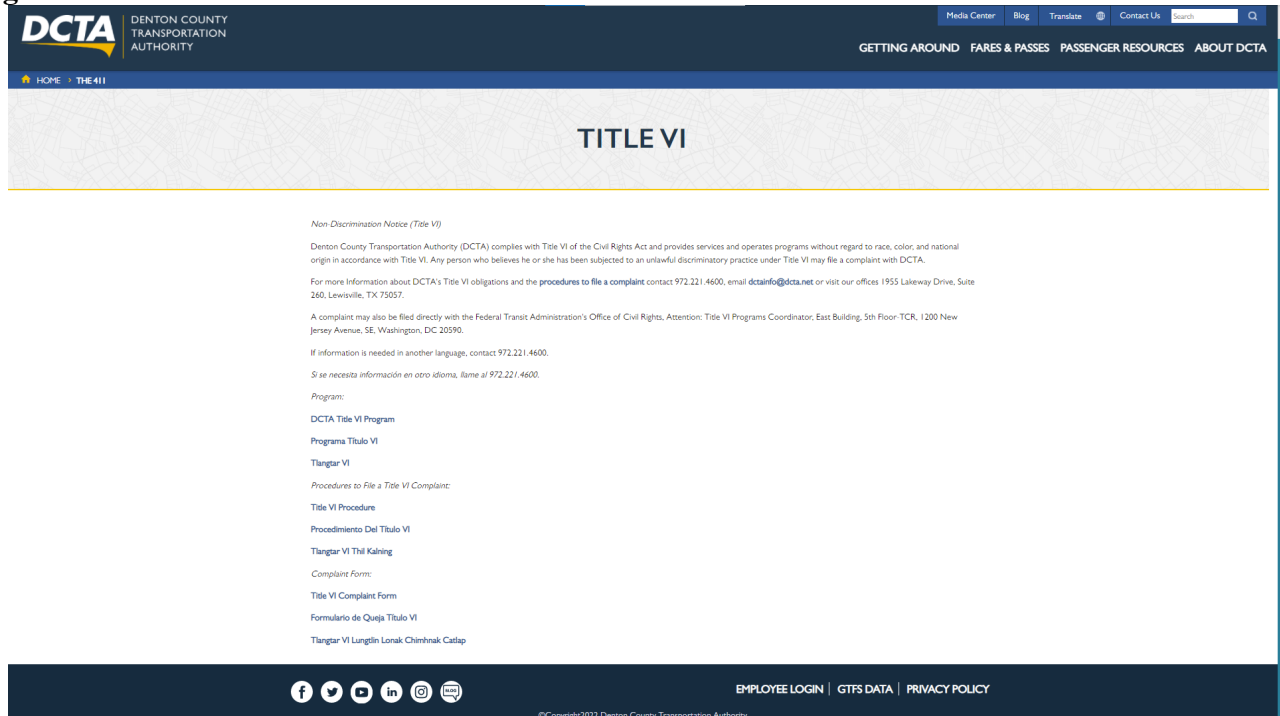
2. General Title VI Requirements

This section documents DCTA’s efforts to meet general Title VI requirements. Included is a description of the following: DCTA’s Title VI public notice; the transit agency’s complaint procedures; the Public Participation Plan; the LEP Plan, program, and activities; an overview of DCTA’s decision-making bodies; and documentation of subrecipient compliance policies.

Notice to the Public

To make DCTA passengers and the general public aware of the agency’s commitment to Title VI compliance and the public’s right to file a civil rights complaint, DCTA posts the following language in English, Spanish, and Hakha Chin on its website, at its transit center and rail stations, and on its bus fleet. Figure 5 presents DCTA’s Title VI notice (also presented in Appendix B and made available to the public on DCTA’s website - <https://www.dcta.net/rider-info/411/title-vi>).

Figure 5. DCTA’s Title VI Notice



Discrimination Complaint Procedures

DCTA has established a process for passengers to file a complaint under Title VI. Any person who believes that he or she has been discriminated against on the basis of race, color, or national origin by DCTA or its contract operators may file a Title VI complaint by completing and submitting the agency's Title VI Complaint form available at DCTA's Administrative Office, DCTA's Downtown Denton Transit Center (DDTC) or on the DCTA website at <https://www.dcta.net/contact-us/title-vi-complaint>. Appendix C presents copies of DCTA's complaint procedures and complaint form in English, Spanish, and Hakha Chin.

DCTA encourages complaints to be filed immediately. DCTA will process complaints that are submitted and will investigate complaints up to 180 days after the alleged incident. Once the complaint is received, DCTA will review, and the complainant will receive an acknowledgement letter within 10 working days informing the complainant whether the complaint will be investigated by DCTA.

Complaints may be filed in writing using the Title VI Complaint form or verbally by calling 972- 221-4600. Completed complaint forms may be mailed to DCTA's Administrative Office at P.O. Box 96, Lewisville, Texas 75067. A person may also file a complaint directly to FTA's Office of Civil Rights at 1200 New Jersey Avenue SE, Washington, DC, 20590, or with The Texas Department of Transportation's Public Transportation Division, Attention: Title VI, 125 East 11th Street, Austin, TX 78701.

DCTA has up to 30 days to investigate the complaint. If more information is needed to resolve the case, DCTA may contact the complainant. The complainant has 30 days from the date of the letter to send requested information to the investigator assigned to the case or the case may be administratively dismissed. A case may also be administratively dismissed if the complainant no longer wishes to pursue their case.

DCTA's Title VI Coordinator conducts all investigations in cooperation with the Operations Department and General Counsel. The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant and other affected parties may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

Based upon all the information received and discovered during the investigation, an investigation report will be written by the Title VI Coordinator for submittal and final determination by the DCTA President/CEO.

Once the final determination is made, the complainant will receive a letter stating the final decision. The letter will either be a letter of finding or closure. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. The closure letter will also include information about the complainant's right to appeal the decision within 10 days. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, explains whether any disciplinary action, additional training of the staff member(s) involved or other action will occur, and the right to appeal the decision within 10 days.

If the complainant simultaneously files a complaint with DCTA and with an external organization such as the state or federal government, the jurisdiction and investigation of the external agency will supersede.

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

DCTA did not receive Title VI complaints during the reporting period. Appendix D confirms no complaints have been submitted in this period.

DCTA's Public Participation Plan

Since the last reporting period, DCTA's public involvement activities have focused on service changes, including those related to COVID-19 impacts and the 2021 GoZone On-Demand service implementation.

Consistent with the principles and elements of the Public Participation Plan, these activities were focused on creating opportunities to engage the public and gather diverse feedback to inform the transportation planning efforts and the policy development of the board. Appendix E presents a list of DCTA's outreach efforts since 2019.

DCTA has implemented a Public Participation Plan that is designed to gather feedback from all constituents and encourage participation in the agency's decision-making process. This section documents the principles and objectives of the plan, procedures used to implement public participation strategies, performance measures, and other relevant details.

Key Principles

DCTA's Public Participation Plan has been prepared to ensure that no individual is precluded from participating in DCTA's service planning and development process. This plan ensures that:

- The public understands and is aware of public transportation's role in the community.
- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity or investment that may affect their environment, community, and/or health.
- The public's contribution can and will influence DCTA's decision making.
- The concerns of all participants involved will be considered in the decision-making process.
- DCTA will actively seek out and facilitate involvement of those potentially affected.

Through an open public process, DCTA has developed a program that uses various techniques to encourage and guide public involvement efforts and enhance access to DCTA's transportation decision-making process by minority and LEP populations. This program is intended to create opportunities for dialogue with passengers and affected communities, enabling them to contribute to and influence DCTA's services. The Public Participation Plan describes the overall objective and outreach methods used to reach passengers and stakeholders.

Program Objectives

DCTA's Public Participation Plan seeks to develop a pro-active public involvement process that provides complete information, timely public notice, and full public access to key decisions. This plan is intended

to support early and continuing involvement of the public in developing services and programs and modifying services or programs and other projects that might impact the public.

DCTA uses a variety of communication methods in order to provide public awareness and understanding about the agency, its functions, programs, and specific initiatives. Additionally, DCTA seeks to engage citizens from various backgrounds, demographics, and income levels while specifically targeting residents typically underserved in transportation decision making.

Through regular review and performance measurement, DCTA continues to improve its public participation methods over time based on feedback from riders and community members, specifically low-income, minority, LEP populations, and customer and community-based organizations.

Public Involvement Procedures

DCTA regularly and frequently seeks citizen and stakeholder input. At a minimum, public involvement action plans are developed and implemented to engage the public in the decision-making process during:

- A major service change in accordance with DCTA's Major Service and Fare Change policy contained in *Appendix G*.
- A fare increase, new fare type, or significant change in the method of fare payment in accordance with DCTA's Major Service and Fare Change policy.
- Key milestones of project implementation of major capital projects.
- Annual Program of Projects development.
- Long-range planning.

While there are minimum thresholds requiring public involvement, DCTA has a history of active public involvement for minor schedule and service changes. In practice, the Authority holds at least two opportunities each year to discuss upcoming service and schedule changes and annual service investments and priorities.

DCTA partners with other agencies and organizations when appropriate. In the past, DCTA has used the North Central Texas Council of Government's adopted Public Participation Plan and process to meet the requirement for presenting the agency's annual Program of Projects. The notices for the regional Transportation Improvement Program meet the notice requirements of the FTA Program of Projects requirements. Additionally, DCTA has partnered with member cities, welcome centers, and social service agencies to garner access to targeted audiences.

DCTA staff reviews all public comment information it receives. All comments are given careful, thoughtful consideration. The comments are incorporated into the planned changes and initiatives, where feasible. All public comments are consolidated and given to the DCTA Board of Directors prior to consideration and adoption of any major service or fare changes.

Performance Measures

DCTA regularly reviews and refines the public involvement process to ensure that the plan's objectives and goals are being achieved. Following each initiative, DCTA staff reviews the process and outcomes and reports to the DCTA Board of Directors with a measurement of the plan's effectiveness. Measurements include, but are not limited to the following:

- Did the public know there was an opportunity to participate?
- Did the public have access to appropriate resources and information to allow for meaningful participation?
- How much input was received?
- How relevant was the input received?
- How many people participated in the meetings?
- What type of media coverage did the initiative receive?
- What types of outreach methods were utilized?
- Did the outreach methods reach the desired audience?
- How did the public's input contribute to the final decision?
- What could have been done differently to achieve a better outcome?

Communication and Involvement Methods

DCTA's public involvement approach is customized to meet the needs of the agency information being presented. The Director of Public Involvement and Communications will determine the appropriate methods and develop an action plan based on the desired outcome and goals for each public/open house meeting.

DCTA strives to provide the public with timely notice of the agency's public involvement opportunities. At a minimum, core communications should be released to the public two weeks prior to the first public involvement opportunity. DCTA will also make a concerted effort to provide adequate time for the public to provide input on key decisions. At a minimum, feedback channels should be open 21 days starting from the first public involvement opportunity.

Although this timeframe is DCTA's goal, there are times when an abbreviated timeline may be necessary to educate, collect feedback, and report findings. This does not supersede any state or federal programs or studies that call for a longer comment period.

Core methods of communication will include, but are not limited to:

- News release sent to local media
- Signage on train and bus vehicles
- Email blast to all riders and stakeholders
- Targeted communications to neighborhood groups and identified populations

DCTA will develop and manage the appropriate databases to ensure proper tracking of outreach efforts.

DCTA recognizes that the traditional meeting format does not work for all. As a result, DCTA typically varies input opportunities to include one or more of the following: one-on-one interactions, online interactions, surveys, hotlines, open houses, and meetings with formal presentations. DCTA posts copies of each presentation following the meeting to allow for additional citizen and stakeholder review and feedback.

Media

DCTA recognizes that the media plays an important role in developing and maintaining a relationship with the public. The media is used whenever possible to provide publicity about key events and

initiatives and to provide key information to the public. A media database, including print, TV, and radio, is maintained to ensure efficient and timely dissemination of information. DCTA also makes a concerted effort to engage media outlets that reach diverse demographic audiences.

DCTA uses a variety of other mediums to provide information about various initiatives and upcoming opportunities for public participation, as well as to provide a method to collect comments and/or hold dialogue, including:

- **Print:** DCTA uses community newspapers within its service area.
- **Outdoor:** DCTA uses electronic boards provided by its member cities and posts notices (in both English and Spanish) on buses and trains and at transit facilities.
- **Website:** DCTA's comprehensive website contains a calendar of events, Public Involvement Plan, respective presentations, and access to an online feedback form. DCTA also uses Social Pinpoint, a web-based community engagement tool, to support outreach efforts.
- **Rider Alerts:** DCTA has nearly 10,000 users subscribing to email rider alerts. These alerts provide information about public input opportunities, upcoming service changes, and service impacts.
- **GOREquest:** GOREquest is an online comment submission system that includes an Apple/Android mobile application and a web-based submission form. GOREquest is used by customers and DCTA customer service staff to input and track comments as well as monitor response and service requests.
- **Social Media:** DCTA uses Twitter, Facebook, YouTube, Instagram, and DCTA's Hop on Board Blog to communicate with and engage customers. DCTA has 18,035 Facebook fans, 6,801 Twitter followers, 52 Instagram followers, and 156 YouTube subscribers. Transit Center TV screens display passenger information and items of community interest.
- **Direct email to passengers, community partners, and stakeholders** are used when appropriate.
- **Speaker's Bureau:** DCTA staff and board solicit opportunities to speak on behalf of the organization to stakeholders and civic groups.
- **Public Information Sessions and Open Houses:** At minimum, DCTA hosts two rounds of three public meetings/open houses each year when appropriate.
- **Community Events:** DCTA sets up trade show booths at key community events.
- **Public Hearings:** DCTA annually holds a public hearing to solicit feedback during the budget development process.
- **Legal Notices:** DCTA uses legal notices as necessary to advertise public participation, employment, and business opportunities.

Appendix F presents an example of a public meeting advertisement.

Community Relations

DCTA establishes regular relationships with key stakeholders, community groups, and identified populations throughout the region to assist with the authority's public participation process and its service to Title VI customers and those with limited English proficiency. These relationships are intended to expand public involvement by:

- Increasing the public's awareness of the role public transportation plays in its community.

- Creating and maintaining an open dialogue with the public.
- Ensuring efficient and timely dissemination of information.
- Assisting DCTA with identifying and understanding the demographics of DCTA's rider groups and potential rider groups.

DCTA maintains a community database that includes elected officials, neighborhood groups, civic groups, minority groups, chambers of commerce, social service agencies, municipalities, and other groups based on their spheres of influence in the community. Any community organization or person can be added to the database by contacting DCTA's Marketing and Communication staff at 972-221-4600 or by emailing dctainfo@dcta.net.

Community Advisory Committee

Another method of encouraging frequent and sometimes focused dialogue in the community is through the creation of Community Advisory Committee. DCTA hosts quarterly Community Advisory Committee meetings, in Lewisville and Denton, as another method for encouraging public dialogue and collecting feedback. The Community Advisory Committee serves as a forum to exchange information between DCTA, its passengers, and the community on transit-related issues and DCTA services and programs.

While the committee is encouraged to meet quarterly, the frequency of the meetings shall be set by the Community Advisory Committee, and should be held in locations accessible by public transit.

Membership is open to anyone from the general public and DCTA regularly communicates meetings to garner new participants. Participation currently includes passengers, transit advocates, representatives from the local universities, and social service organization members.

Limited English Proficiency Plan

DCTA's LEP Plan addresses the agency's responsibilities, as a recipient of federal financial assistance to meet the needs of individuals with limited English language skills. Executive Order 13166, titled *Improving Access to Service for Persons with LEP*, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. This order applies to all state and local agencies that receive federal funds, including DCTA. DCTA receives federal assistance through the U.S. DOT, which includes FTA, the Federal Railroad Administration, and the Federal Highway Administration.

DCTA has developed this LEP Plan as part of its Title VI Program to help identify reasonable mechanisms for providing language assistance to persons with LEP who wish to access DCTA services. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

To ensure meaningful access to programs and activities, DCTA uses the information obtained in a Four Factor Analysis to determine the specific language services that are required by the transit agency's ridership and the appropriate methods to engage those with LEP. This analysis helps DCTA determine if it communicates effectively with LEP persons and informs language access planning and the development of passenger information.

The four-factor analysis is a local assessment outlined by the U.S. DOT that considers:

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

For the purposes of this plan, statistically significant LEP groups are defined as persons with the same first language, comprising two percent or more of the DCTA service area (as defined in the Agency Overview section), who have LEP. Additionally, in accordance with the Safe Harbor Provision of FTA Circular 4702.1B, DCTA provides written translation of vital documents (defined under the Factor 1 discussion, below) for each eligible LEP groups that constitutes 5 percent or 1,000 persons, whichever is less, of the total population served or likely to be encountered or affected. Based on the four-factor analysis outlined more thoroughly below, DCTA has identified Spanish speakers as an eligible population group throughout the service area and Hakha Chin speaking individuals in the Lewisville, TX, service area.

Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.

As defined in the Agency Overview section, for the purposes of this document DCTA's service area includes all of Denton and Collin County, while its fixed route services are focused within the cities of Denton, Lewisville, and Highland Village within the Denton/Lewisville UZA. The A-train has a terminus station in Carrollton which provides transfer opportunities for continued travel into Downtown Dallas and other connections via Dallas Area Rapid Transit (DART) light rail and bus services. The North Texas Xpress, as operated by DCTA, includes nonstop service from the Trinity Metro North Park and Ride to Downtown Denton Transit Center (DDTC), with several stops around Denton. Under contract with the City of Frisco, DCTA operates curb-to-curb demand response transit service to eligible Frisco residents for trips within Frisco as well as designated portions in the City of Plano.

DCTA's demographic profile has been established using the following sources:

- Review of U.S. Census Data: A review of American Community Survey (ACS) 2019 5-Year Estimate data identified a statistically significant representation of Spanish speaking households with limited English in Denton County, Collin County, Denton (city), and Lewisville, as well as Asian and Pacific Island language speaking households with limited English in Denton County, Collin County, Frisco, and Lewisville. Table 1 presents the percent of total household in each geography that identify as LEP organized by the household's primary household language.

Table 1. LEP Household Percentages by Primary Household Language.

Geography		Spanish	Other Indo-European Language	Asian and Pacific Island Language	Other Languages
Key Cities	Denton	7.5%	1.1%	1.9%	0.4%
	Frisco*	1.5%	0.9%	2.2%	0.0%
	Highland Village	0.6%	0.0%	0.3%	0.0%
	Lewisville	11.1%	0.6%	5.4%	0.0%
County Totals	Denton County	5.8%	1.8%	4.5%	0.5%
	Collin County	7.5%	0.9%	3.7%	0.2%

Source: US Census Bureau, 2019 ACS 5-Year Estimates

Note: Key cities represent a portion of Denton or Collin counties, therefore city totals do not sum to county totals.

*The borders of Frisco cross county borders so that the city is in both Denton and Collin counties.

- Review of DCTA Survey Data: DCTA conducts a bi-annual survey of its customers to measure system performance, gather input on service initiatives and priorities, and understand customer demographics. In survey data from 2019, English and Spanish were the predominant languages spoken by DCTA customers. Nearly 7 percent of customers in 2019 indicated that Spanish was their primary language. Other languages submitted via the survey included Hakha Chin (0.06 percent) and English (86 percent).
- Examination of prior experiences: Discussions with DCTA transit operators, customer service representatives, and the call center confirmed frequent and consistent encounters with Spanish speaking individuals who have little or no English proficiency. In most cases, the information requested relates to routes, schedules, connections with other transit systems, key destinations (retail, medical, social services, and employers) and fare information.
- Discussions with partner cities, local school districts, and stakeholders revealed that their data and experience indicated a need to provide Spanish speaking individuals with information in their native language. Knowing that fact, DCTA has worked with the local school districts, Texas Workforce Commission, and social service agencies to ensure the needs of these individuals, especially those with LEP, are met.
- Discussions with the City of Lewisville did indicate another demographic in addition to Spanish speaking individuals that meets the Safe Harbor thresholds. Over 3,500 Chin refugees from Myanmar have relocated to Lewisville with the assistance of Catholic Charities. While representing a small portion of the Lewisville population, a majority of these individuals do not own a car and are likely to need public transportation. DCTA works closely with the City of Lewisville on providing transit information and customized resources. DCTA utilized a translation company to assist with all translations and engages with Catholic Charities and the

City of Lewisville for translations when needed. All DCTA's vital documents are translated in Hakha Chin and available via download. Vital documents for these purposes include:

- All agency Route Guides for bus, the A-train and on-demand services
- Title VI information including DCTA's Title VI Program, policies, procedures, and complaint form
- Access information including policies, procedures, and application.

The analysis conducted in Factor 1 clearly indicates the need for language services in Spanish throughout the service area and in Hakha Chin in Lewisville. Additional understanding of where in the service area populations of LEP reside is also helpful. Figure 6 through Figure 10 present spatial reference for the location of LEP households within the DCTA service area.

Factor 2: The Frequency with Which LEP Individuals Come Into Contact with DCTA Programs, Activities and Services

There are a large number of places where members of the LEP population may come into contact with DCTA services. An important part of the development of DCTA's Language Access Plan is the assessment of major points of contact.

Discussions with DCTA transit operators, customer service representatives, and the agency call center indicate frequent interactions with individuals that speak only Spanish. These individuals are frequent users of DCTA's fixed route and demand response services. While interactions with other individuals that are linguistically isolated but do not speak Spanish is limited, rare occurrences are experienced. African, Asian, and Middle Eastern dialects are the next most frequent occurrences.

DCTA hosts regular discussions and opportunities for engagement at DCTA facilities and other public venues during service changes or to gather feedback on service provision.

Based on Factor 2 and the discussions described, no significant additional languages or populations were identified as eligible participation groups (beyond those identified by Factor 1, Spanish and Hakha Chin).

Figure 6. Limited English-Speaking Households – All Languages.

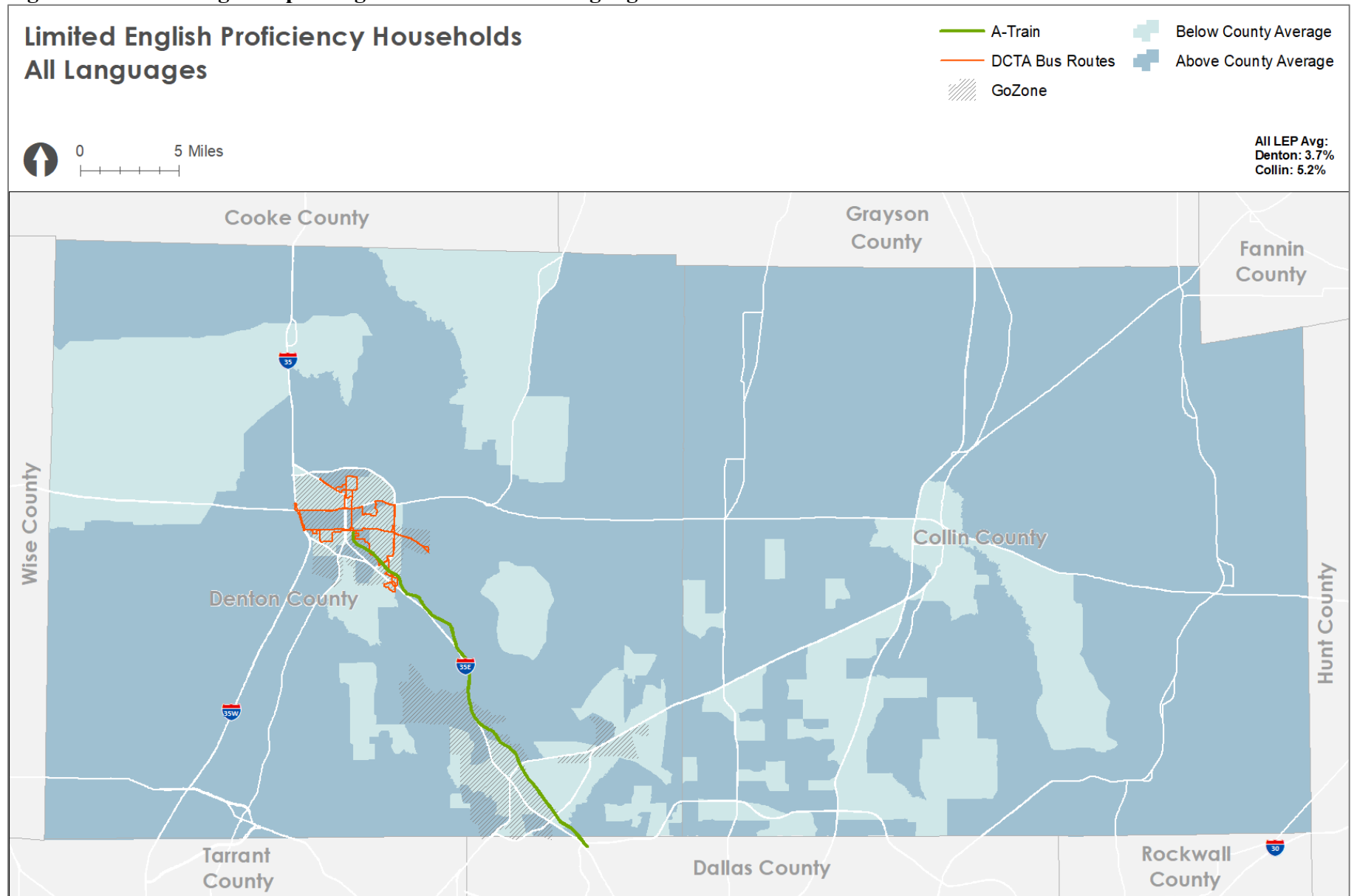


Figure 7. Limited English-Speaking Households – Spanish Language.

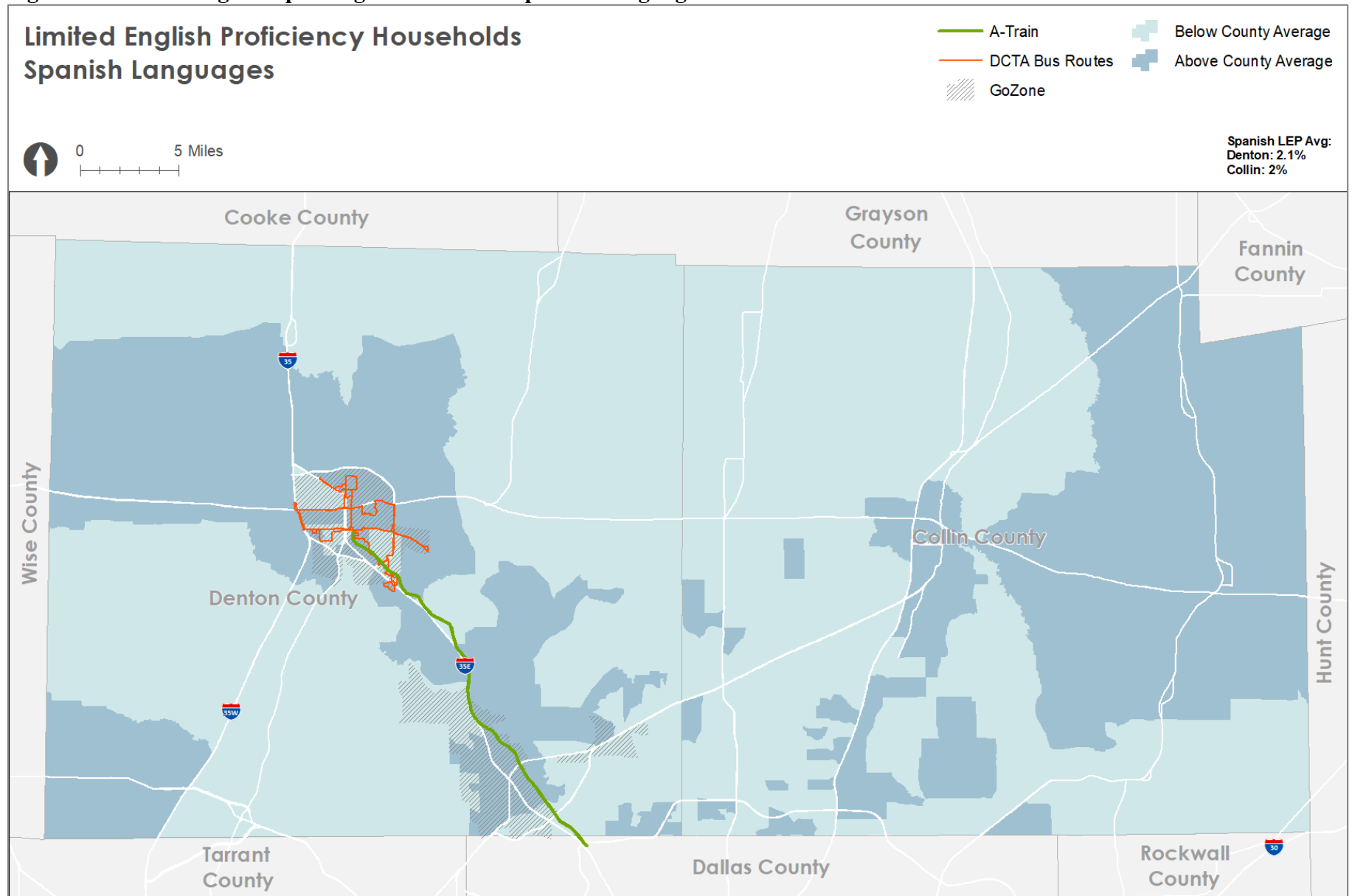


Figure 8. Limited English-Speaking Households – Indo-European Languages

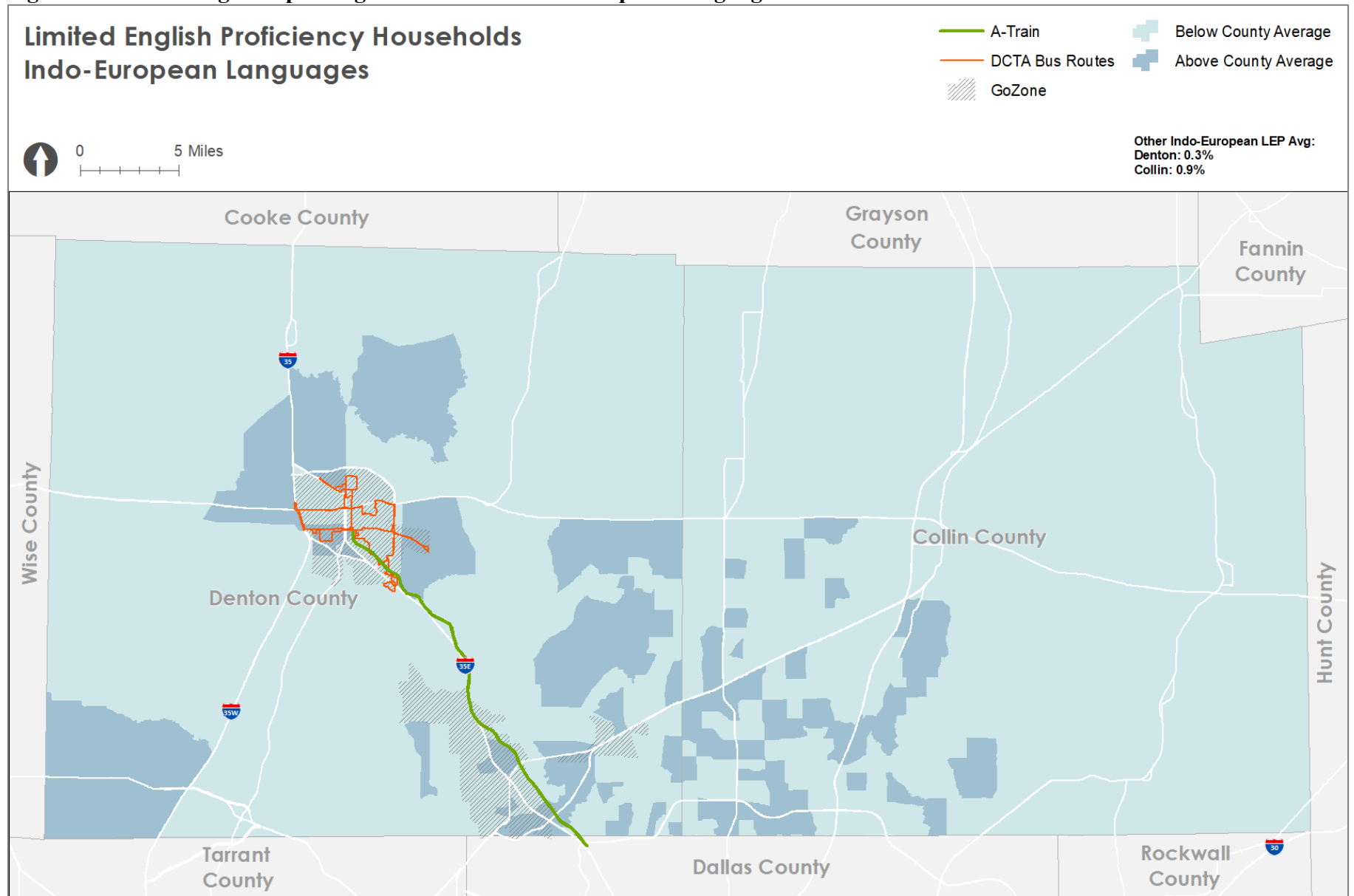


Figure 9. Limited English-Speaking Households – Asian and Pacific Island Languages.

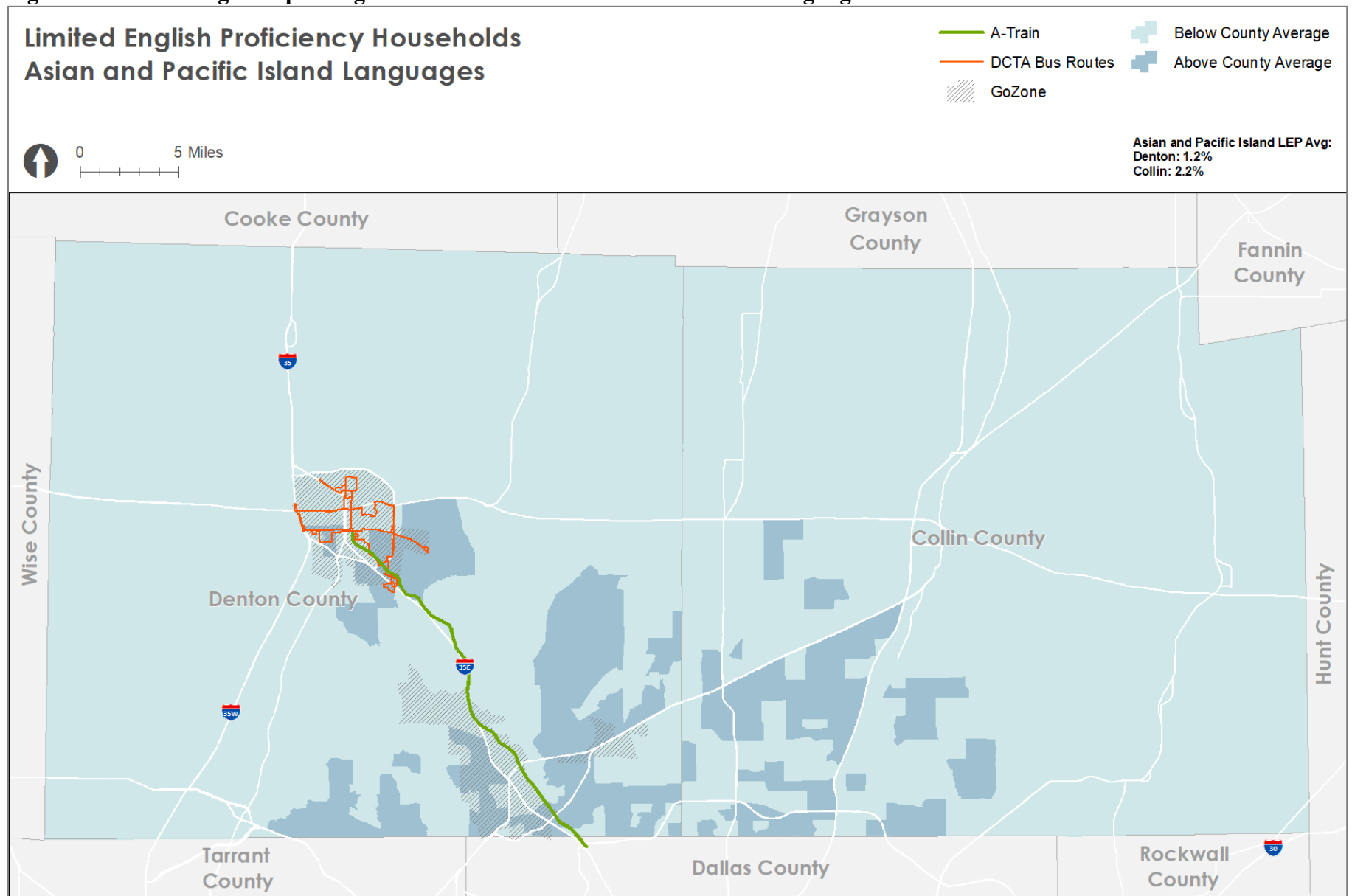
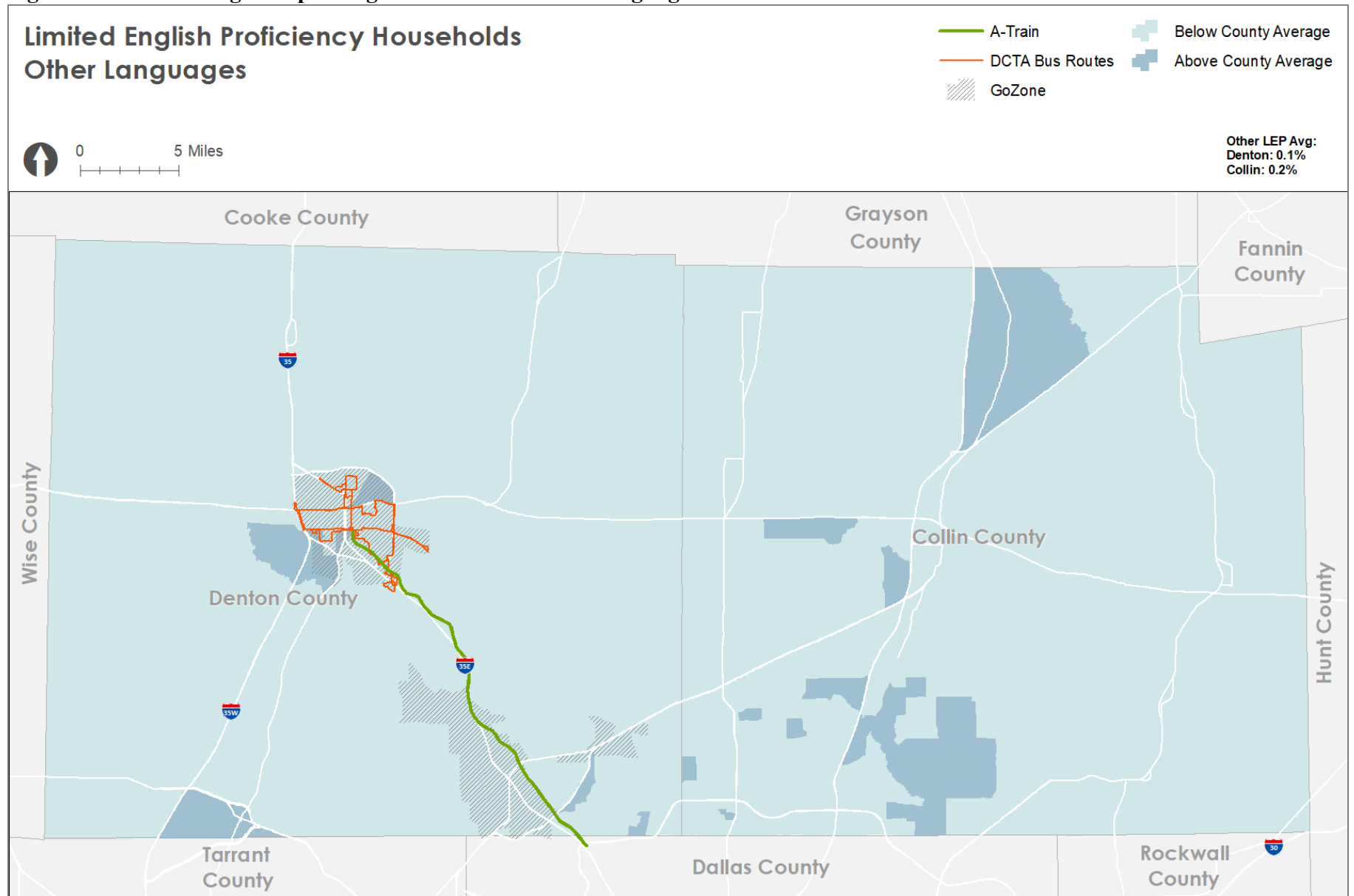


Figure 10. Limited English-Speaking Households – Other Languages



Factor 3: The Importance to LEP Persons of DCTA Programs, Activities and Services

Access to the services provided by DCTA, both fixed route and on-demand are critical to the lives of many in the area. Many depend on DCTA's fixed route services for access to jobs, education, and essential social services. Due to the essential nature of services provided by DCTA, the transit agency needs to make every effort to ensure that language is not a barrier for access to the system.

Through outreach and the agency's community and passenger satisfaction surveys, DCTA has determined that the transit agency's services are often the primary means of transportation for populations with LEP. Critical information that can affect transit access for these populations includes:

- Route Guides
- Fare and Payment Information (as listed in route guides)
- GoZone Service Policies, Procedures and Smartphone Application
- Title VI Notices
- Title VI Complaint Form and Procedures

According to DCTA's service area demographic profile, individuals that speak Spanish are the only LEP population identified as a statistically significant LEP group according to DCTA's threshold for a significant language (a language group comprising 2 percent or more of the DCTA service area, who have LEP) across the service area. All the above documents are available in Spanish.

Factor 4: LEP Resources Available to DCTA and the Costs

DCTA assessed its resources for providing LEP assistance, including cost of translation and printing of additional materials, and identifying materials and information that need to be made immediately available in other languages. Consideration was also given to the amount of staff and vehicle operator training that is needed.

Due to the small size of the agency and limited resources, DCTA has collaborated with community organizations and social service agencies to provide LEP assistance. These agencies may include Lewisville Independent School District (ISD), Denton ISD, Carrollton/Farmers Branch ISD, Lake Dallas ISD, UNT, Texas Woman's University, NCTC, the Salvation Army, the City of Denton, the City of Lewisville, the City of Highland Village, Immaculate Conception Catholic Church, Catholic Charities, Serve Denton, REACH of Denton, Southeast Denton Neighborhood Association, Denton County My Health My Resources (MHMR), Veterans Services Offices in Denton and Collin County, Christian Community Action, and Our Daily Bread.

These organizations help with the dissemination of printed information, travel training, and the identification and joint participation in educational and outreach opportunities to help improve access for LEP persons.

DCTA minimizes annual costs by printing English and Spanish materials and providing Hakha Chin materials in a print-friendly, digital format. DCTA's website makes use of Google Translate, which allows translation of the website's contents into 17 languages, including Spanish, and it is free of charge to DCTA and its customers. DCTA reviews its translation expenditures and budgets accordingly for each fiscal year.

LEP Program and Activities

Following the four-factor analysis, DCTA concluded that, in addition to providing outreach materials in Spanish and vital documents in Hakha Chin, there is a need for additional services to assist other LEP populations within the region.

As a result, DCTA's LEP Program outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. Methods of determination of need and assistance include:

- Examination of records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events.
- A welcome table at any DCTA sponsored event so that a staff person greets participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English.
- Individuals self-identifying as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist DCTA in identifying language assistance needs for future events. Follow-up participation opportunities will be offered to those individuals either via phone call with an interpreter or through written communication in their native language.
- Have Language Identification Flashcards on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to try to obtain contact information to give to the Operations Manager for follow-up with the assistance of Language Line services.
- Actively recruit bilingual employees.
- Dispatchers and schedulers will also have Language Identification Flashcards to assist in correctly identifying the customer's native language of any LEP individuals they encounter, either in person or over the phone. If such individuals are encountered, dispatchers and schedulers have been instructed on how to employ Language Line services for assistance.
- Language Identification Flashcards will be available at the Downtown Denton Transit Center (DDTC) and at the main office reception desk. It will be especially important for the customer service representatives to have these cards available since the station serves both the local transit system and the regional rail network. Employees at both locations have been instructed on how to utilize Language Line services to assist any LEP individuals encountered.
- Specific web content for both DCTA's Title VI and Limited English Proficiency programs can be found at:
 - Title VI - <https://www.dcta.net/rider-info/411/title-vi>
 - LEP - <https://www.dcta.net/rider-info/411/limited-english-proficiency-plan>

Language Assistance Measures

Spanish and Hakha Chin speaking individuals with LEP have been identified as statistically significant populations that require access to vital information in their native languages. DCTA will provide the following measures to ensure access to these individuals and other individuals with LEP:

- Translation services are available at all public meetings with advanced request. This information is included in meeting postings.
- Language Identification Flashcards are available at all times in DCTA vehicles, at the DDTC, and at transit system administrative offices where tickets are sold, or information is distributed.
- The DCTA Title VI Policy, Complaint Form, and LEP Plan is posted on the agency website at www.RideDCTA.net.
- DCTA posts translated versions of the Title VI notice along with the English version on all DCTA vehicles and at the DDTC.
- DCTA provides translations of agency vital documents and information necessary for a passenger to effectively use DCTA services.
- DCTA provides reasonable means for an individual to request public information, comment on DCTA programs or services during the public participation process, or file a complaint to DCTA regarding services or programs.
- DCTA makes every effort to hire bilingual operations staff, customer service representatives, and operators.
- When an interpreter is needed, in person or on the telephone, staff attempts to determine what language is required and to access language assistance services through local colleges and universities, social service agencies, or through www.language.com.
- When staff prepares a document or schedules a meeting for which the target population is expected to include LEP individuals, the documents, meeting notices, flyers, and agendas are printed in an alternative language based on the known LEP population.

Staff Training

The following training is provided to DCTA staff and DCTA operations contractors.³

- Information on DCTA Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Description of agencies and resources that can assist DCTA in providing service to special populations including those with LEP.
- Use of Language Identification Flashcards.
- How to handle a potential Title VI/LEP complaint.

Monitoring and Updating the Plan

The Marketing and Communications Department in conjunction with Planning and Operations staff will monitor the effectiveness of this plan. Monitoring includes annual reviews of census data in coordination with North Central Texas Council of Governments for changing patterns of LEP populations, ongoing collaboration with regional partners and community groups, and post event assessments. Additionally, staff will continue to pursue new media opportunities to offer affordable and effective travel information in multiple languages.

LEP plan updates will include the following:

- How the needs of LEP persons have been addressed.

³ Information is provided by NCTCOG Title VI Onboarding Training documents, last updated 2021

- Determination of appropriate documents for translation.
- Determination of the current LEP and Safe Harbor populations in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether transit system's financial resources are sufficient to fund the language assistance resources needed.
- Determine whether DCTA has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

Dissemination of DCTA's LEP Plan

A link to DCTA's plan is included on the DCTA website at <https://www.dcta.net/rider-info/411/limited-english-proficiency-plan>.

Any person or agency with Internet access will be able to access and download the plan from the DCTA website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation, which DCTA will provide, if feasible.

Questions or comments on the LEP Plan may be submitted to DCTA's President or any member of the agency's Executive Team.

Overview of Decision-Making Bodies, Planning, and Advisory Groups

In addition to the Board of Directors, DCTA has five committees, one of which, the Community Advisory Committee, consists of non-elected members of the general public. The duties of the Board and each committee are summarized below.

Efforts to Encourage Minority Participation on DCTA Decision-Making Bodies

DCTA recognizes the importance of diverse participation on its planning, advisory, and policy making bodies. While DCTA does not directly appoint members to its Board of Directors, DCTA will continue to encourage the appointing entities to consider diversity in their selection process. DCTA will continue to actively solicit participation on its Community Advisory Committee and Social Services Roundtable and will increase its efforts to engage minority, low-income, and LEP populations through direct outreach to social service agencies and the general community. Additionally, DCTA occasionally forms ad-hoc stakeholder workgroups to assist with project planning efforts. DCTA ensures that the work groups adequately reflect the diverse community. For example, between October 2020 and September 2021, DCTA conducted 73 outreach actions to community members and stakeholder groups including employers, social service agencies, senior groups, the Denton Black film festival, student organizations, and residential communities.

Appendix E presents a complete list of these efforts.

Board of Directors

DCTA is governed by a politically appointed 11-member Board of Directors, 5 voting members and 6 non-voting members. Board terms are typically for two years, beginning on November 13. Board officers

(Chair, Vice Chair, and Secretary) serve one-year terms. No positions are directly appointed by DCTA. Board meetings are held the fourth Thursday of each month beginning at 10:00 AM in the DCTA Board Room.

Texas Transportation Code 460 [Section 460.202] outlines eligibility for participation on the board. To be eligible for appointment, a person must: (i) have professional experience in the field of transportation, business, government, engineering, or law; and (ii) reside: (A) within the territory of the Authority; or (B) outside the territory of the authority in a municipality that is located partly in the territory of the Authority.

Table 2. Board of Directors Racial Makeup.

Year	Race	Gender	Total
2019	12 Caucasian, 1 Middle Eastern	11 male, 2 female	13
2020	All Caucasian	8 male, 2 female	10
2021	10 Caucasian, 2 Hispanic, 1 Prefer Not to Answer	11 male, 2 female	13

Community Advisory Committee (CAC)

DCTA routinely recruits passengers, stakeholders, and community members to join the agency's Community Advisory Committee. Recruitment efforts occur monthly through outreach opportunities, partnerships, Rider Alerts, and social media posts.

The Community Advisory Committee provides a forum to exchange information between DCTA staff, its passengers, and the community members on transit related issues. While the Community Advisory Committee is not authorized to make decisions, this team of local volunteers can influence decisions, interact more closely with DCTA staff, and participate in decision making processes. Participation is on a volunteer basis and participants are required to reside in the local service area. The current committee consists of DCTA transit system users, non-transit users, higher education representatives, human service organizations, and interested participants seeking ways to improve the public transportation options available in DCTA's service area. These residents represent a broad range of interests, such as public transportation, community enhancement, environmental issues, economic development, and issues concerning seniors.

Table 3. Community Advisory Team – 2021 Membership Racial Makeup.

Race	Gender	Total
Caucasian	8 male, 1 female	9
Latin American	2 male, 0 female	2
African American	0 male, 0 female	0
Total	10 male, 1 female	11

Social Services Agency Roundtable

DCTA hosts quarterly social service agency (SSA) roundtable meetings for Denton County social service agencies, with one meeting for Denton-focused agencies and one meeting for Lewisville-focused agencies. Many dedicated professionals come to the roundtable to make life better for the people they serve. The SSA meetings are an opportunity for DCTA to provide service updates that they can then pass on to clients, and in return, the SSA partners presents the DCTA with needs and ideas that will potentially make transit more accessible for all users. Attendance to the meetings is not predicated on membership. Table 4 shows the responses to a race/ethnicity and gender questionnaire that was sent to attendees, with 7 responses obtained.

Table 4. Social Services Agency Roundtable – February 2022 Meeting Attendance Responses

Race	Gender	Total
Caucasian	1 male, 3 female	4
Latin American	0 male, 1 female	1
African American	0 male, 2 female	2
<i>Total</i>	<i>1 male, 6 female</i>	<i>7</i>

Subrecipient Compliance

DCTA does not have any subrecipients.

3. Additional Requirements for Transit Providers

DCTA operates a fixed route transit service with less than 50 vehicles during peak service in an area of over 200,000 people. According to FTA Circular 4702.1B, DCTA is required to develop service standards and policies for its services. As DCTA is not operating more than 50 vehicles, DCTA is not required to analyze transit service performance, analyze and summarize the demographics of its service area, nor develop a plan for addressing equity issues related to major service and fare changes. However, DCTA had previously established these Title VI Policy sections when operating 50 or more vehicles in peak service, and these have been brought forward should DCTA elect to continue tracking or analyzing these measures moving forward. This section documents each of these topics.

Service Standards and Policies

DCTA aspires to the following system-wide standards and policies to ensure service design and operations do not result in discrimination based on race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold. Quantitative standards for vehicle load, vehicle headways, on-time performance, and service availability are listed below.

Service standards and policies provide a framework for guiding decisions by which fixed route services are created, expanded, and evaluated. By providing a defined set of performance standards, DCTA staff and the Board have consistent standards regarding on how to allocate, prioritize, and deploy services.

These service performance and design standards include:

- Route classification.
- Desired minimum service spans and frequencies.
- Desired minimum route-level operating standards.
- On-time performance

Route Classification System

Transit services are most effective when they are tailored to the design and needs of the communities they serve. For planning purposes, the following definitions of service types will be used to identify both the types of fixed route services provided by DCTA and those that might be provided by DCTA in the future:

- **Regional Commuter Rail Services:** This service is best characterized as a bidirectional passenger rail service with limited stops, fast travel times, and stations in major population centers or at major employment destinations. The A-train is categorized as this service.
- **Regional Express Bus Services:** The North Texas Xpress service is an example of DCTA's operation of premium commuter service, but regional express bus services may be appropriate in other locations in Denton County. This service type offers fast service during peak commute hours, focusing on linking cities or neighborhoods with high concentrations of workers traveling to a specific employment area or a major transit hub. Express bus services may take advantage of arterial and freeway HOV lanes, allowing them to provide a level of service that is comparable – or in some cases better than – automobile travel times. DCTA's North Texas Xpress (NTX) is an example of regional express bus service.

- **Community Circulators:** Other local fixed-route bus services, typically operating at 30- or 60-minute headways (but with the potential for greater frequencies), are termed community circulator routes. Most of DCTA’s existing Connect routes would be classified as community circulators. Except around universities, these are designed to provide policy level coverage service to neighborhoods that do not have the population density or employment — or design characteristics — to support trunk routes. Services are designed to adapt to the unique characteristics of the neighborhoods or cities they serve. Whenever possible, clockface operations and timed transfer at transit centers should be accommodated in route designs. This suggests very careful attention to the length of the route to ensure there is a reasonable match between the schedule cycle time and the route length. Three types of community circulators are identified for Denton County.
 - **Neighborhood Circulators:** These are traditional fixed route services. Neighborhood circulators should be established when higher levels of service cannot be effectively supported, because they do not compete with private autos. They normally operate every 30 to 60 minutes and should operate on a clockface headway whenever possible.
 - **Feeders:** Feeder buses are designed to “feed” trunk routes, commuter rail, and regional express bus services. Schedules are drawn to provide clockface headways. Feeder routes operate in urban and lower-density suburban neighborhoods and every effort should also be made to provide timed transfers with other routes at the transit centers served by feeders.
 - **University Circulators:** These may look like traditional fixed routes, but have a specific market – student, faculty, and staff ridership – and serve a location with significant parking constraints or costs. These routes normally operate at relatively good frequencies – every 5 to 30 minutes – and clockface headways are often not as critical.

Minimum Service Span and Frequency

Span of Service

The time between the first and last trip operated on a route defines the span of service. In addition, service span specifies the minimum period of time service will operate at any point in the system. This gives customers confidence that direct and connecting service will be provided during the span hours. The table below details the span of service that should be provided by type of service.

Table 5. Desired Minimum Service Span

Route Type	Weekday		Saturday	Sunday
Commuter Rail	5am - 9pm		8am - 11pm	N/A
Regional Express Bus	6am - 6pm		N/A	N/A
Community Circulators	5am - 9pm		9am - 6pm	N/A
GoZone	Monday - Thursday	Friday	8am - 11pm Guaranteed Ride Home 11pm - 2am	GoZone
	5am - 10pm Guaranteed Ride Home 10pm - 1am	5am - 11pm Guaranteed Ride Home 11pm - 2am		

Frequency

Service frequency has a major influence on transit ridership. Frequent service is costly to provide but is valued by regular and occasional customers. Table 6 presents current service frequencies for DCTA fixed-route modes.

Table 6. Existing Fixed-Route Service Frequencies

	Weekday		Weekend	
	Peak	Mid-day	Saturday	Sunday
Commuter Rail: A-train	30	30	60	N.A.
Regional Express Bus: North Texas Express*	N.A.	N.A.	N.A.	N.A.
Community Circulator: Route 2	40	40	45	N.A.
Community Circulator: Route 3	40	40	45	N.A.
Community Circulator: Route 4	40	40	60	N.A.
Community Circulator: Route 5	30	30	30	N.A.
Community Circulator: Route 6	30	40	40	N.A.
Community Circulator: Route 7	30	40	60	N.A.

* North Texas Express operates a single trip only during AM/PM peak periods

DCTA continually evaluates its fixed-route network with an eye towards improving operating efficiencies and service frequencies in areas with high transit demand.

On-Time Performance

The on-time performance standard for all fixed route modes operated by DCTA is measured by arriving no earlier than one (1) minute from scheduled and no later than five (5) minutes after scheduled. Routes which are in the bottom ten percent for this metric should be reviewed to identify any operational improvements or schedule adjustments.

Service Performance Standards

DCTA will monitor key system-wide performance statistics, using pre-established targets to measure organizational success. System service standards cover a wide range of subjects including ridership, safety, reliability, and customer satisfaction. As DCTA's service structure evolves to incorporate on-demand GoZone service, these standards will be updated to reflect the relevant metrics.

Level and Quality of Service Monitoring

DCTA conducts regular analyses to provide an accurate depiction of service quality. Prior comparative analyses tended to indicate a high level of transit service existed in areas with predominate minority populations and suggested minority population centers tended to generate substantial ridership. Comprehensive route analyses inform necessary service changes and ridership statistics to maintain revenue.

Service Provision to Minorities and Low-Income Individuals

Fixed route service provides significant access in the areas of Denton and Lewisville with above average minority populations. DCTA will continue to evaluate available service and demographic information to ensure quality service for all citizens.

Service Area Demographics

As defined in the Agency Overview section, for the purposes of this document DCTA's service area includes all of Denton and Collin County. DCTA's current fixed route services are focused within the Cities of Denton and Lewisville and on-demand service is available in Denton, Lewisville, and Highland Village. For demographic and equity analyses purposes, Denton County's demographic statistics are considered the baseline service area statistics against which other census geographies' statistics will be compared. DCTA also has a regional commuter rail service that connects with the regional transit network in the City of Carrollton. A large portion of DCTA's ridership is comprised of students, faculty, and staff from the UNT, North Central Texas College, and Texas Woman's University.

Figure 11 illustrates the location of census block groups with minority populations that exceed the DCTA's service area's average minority population. Figure 12 depicts the census block groups that exceed the average percentage of low-income populations within the two counties within DCTA's service area.

Figure 11. Minority Population.

ppendix

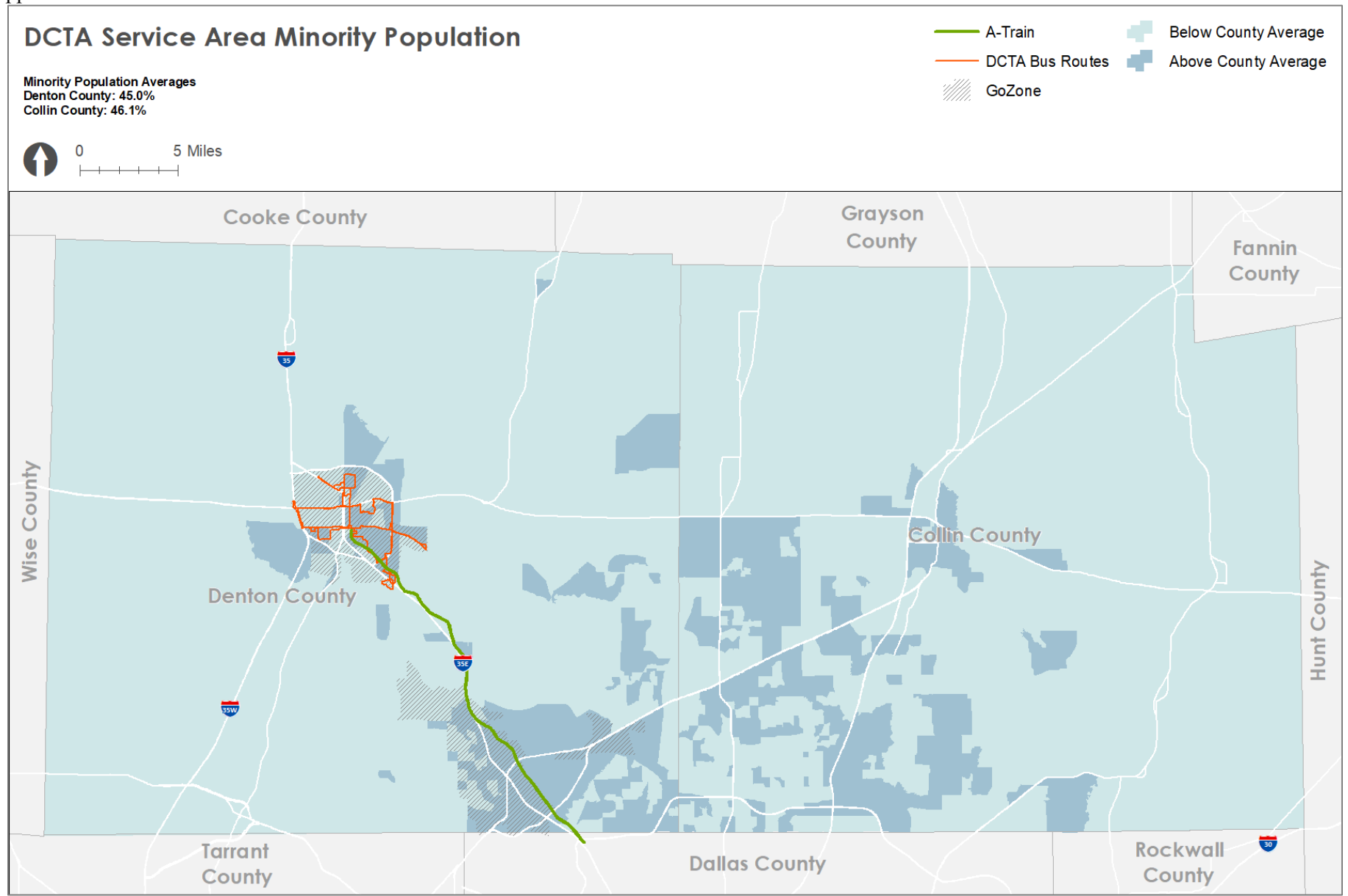
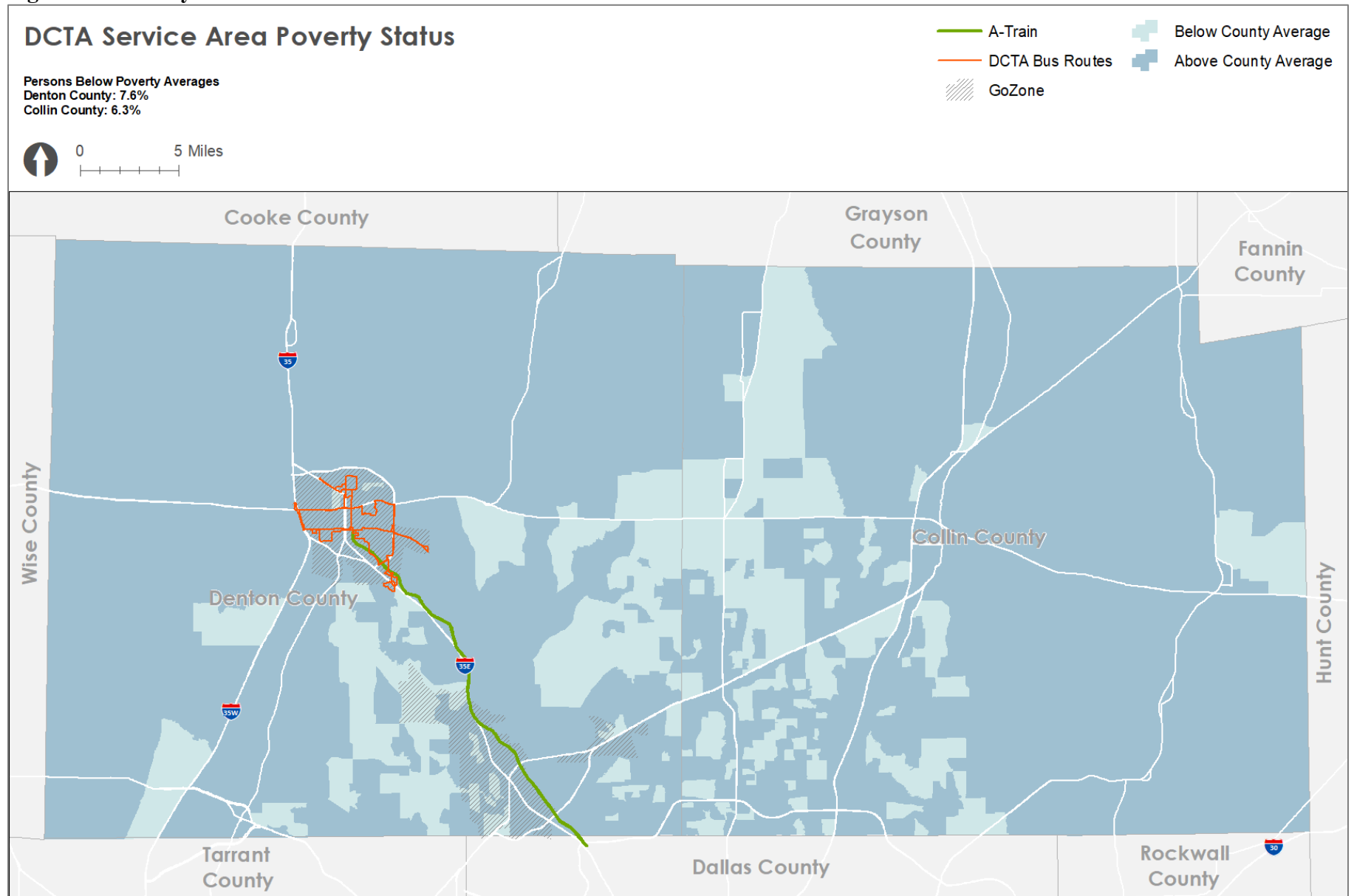


Figure 12. Poverty Status



4. Title VI Equity Analysis

DCTA may elect to conduct an equity analysis to measure any impact of service and fare changes. Suggested guidance on what may be considered significant changes and equity evaluation criteria may be found in Appendix G. To comply with federal requirements, the Title VI equity analyses provided in this report are based on FTA guidance using methods and definitions within the public transit community.

Fare and Service Equity Analysis Process

To conduct a Fare and Service Equity Analysis, DCTA may use the following process:

1. As soon as any change in fare or service is proposed, DCTA staff describes in detail the proposed change. The detailed description included what routes, schedules, and service indicators (level and/or quality of service) would be affected. Additionally, staff describes the need or impetus for change.
2. A determination is then made if the changes qualify as a major fare or service change under the Agency's Major Fare and Service Change Policy. In the future, a record will be kept of both determinations.
3. If the determination is yes, further analysis is required, and public participation is warranted.
4. A comparison is made to determine the difference between the existing service and proposed service for those impacted by the change.
5. To analyze possible adverse effects, DCTA staff uses the following steps:
 - a. Determine the affected area.
 - b. Describe the demographic and ridership data and ridership data being used for the analysis and how they were collected.
 - c. Describe how the data will be used to determine if the proposed change will have an adverse effect.
 - d. Compare the location of the proposed change to the most recent demographic data on file. According to the data, is the affected area a minority, low-income, or LEP area?
 - e. Compare the ridership population that will be affected by the change as compared to the general ridership population. Could there be a potential disparate impact or disproportionate burden? Explain.
 - f. Analyze the data to describe the details and extent of the possible impacts.
 - i. Create maps showing the affected areas and demographic data along with route information.
 - ii. Create tables showing impacts of each type of change and the affected and overall ridership population.
 - iii. Determine whether the proportion of minorities and/or low-income population that is affected is significant when compared to the general population set using thresholds designed in each policy. If not, finalize the analysis and provide to the Board. If so, steps need to be taken to describe these negative effects and to develop alternative options that mitigate, avoid, or minimize these effects.
 - iv. Repeat the analysis for any alternative options.
 - v. Present the finding to the Board of Directors for review and acceptance.

6. The Public Participation Plan determines adequate comment period and appropriate communication and participation methods.
7. All comments are recorded and presented to the Board of Directors as part of the decision-making process.

Appendix H presents the Title VI analysis documentation for each proposed service change that occurred since DCTA's 2019 Title VI Program Update.

Construction Equity Analysis

When DCTA plans to construct or expand a facility, the agency conducts a Title VI Equity Analysis on the location of the facility during the planning stages. The following principles are applied in the analysis:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, or minority and low-income populations.
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

5. Grants, Reviews, and Certifications

DCTA has one (1) competitive application pending, FY21 CRISI funded by FRA, along with formula funding applications that are pending approval and execution by FTA.

DCTA has not been subject to any Civil Rights Compliance Reviews in the past three years. DCTA's 2022 Triennial Review resulted in two findings with respect to its Title VI plan/activities, as presented in Appendix I. DCTA was scheduled for a Triennial Review in 2021, but FTA postponed all reviews due to the Covid-19 pandemic. DCTA is currently in the process of its 2022 Triennial Review which is expected to conclude in July 2022.

DCTA has executed its most recent Certifications and Assurances from the FTA as required.

Contact

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

Athena Forrester, CPPO, CPPB
Assistant Vice President of Regulatory Compliance
Denton County Transportation Authority
afortrester@dcta.net
972-316-6092

**DENTON COUNTY TRANSPORTATION AUTHORITY
RESOLUTION NO. R22-05**

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE DENTON COUNTY TRANSPORTATION AUTHORITY (“DCTA”) APPROVING ITS TITLE VI PROGRAM UPDATE; PROVIDING A REPEALING CLAUSE; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, the Denton County Transportation Authority, as a recipient of federal funds, has been required to comply with Federal Transit Administration Circular 4702.1B and Title VI of the Civil Rights Act of 1964 and its related regulations; and

WHEREAS, the DCTA has developed a Title VI Policy in accordance with FTA Circular 4702.1B as amended; and

WHEREAS, Title VI of the Civil Rights Act of 1964 and related statutes prohibit discrimination on the basis of race, religion, color, national origin, sex, age, or disability; and

WHEREAS, the DCTA, as a recipient of federal financial assistance and a Federal Transit Administration designated recipient, is required to comply with Title VI requirements which include review and approval of a Title VI Program every three (3) years; and

WHEREAS, the DCTA is updating Title VI policies which will be included in the 2022 Title VI Program Update.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE DENTON COUNTY TRANSPORTATION AUTHORITY, THAT:

SECTION 1. The Denton County Transportation Authority Board of Directors hereby approves the DCTA 2022 Title VI Program Update, the original of which shall be maintained in the office of the AVP of Regulatory Compliance referenced by the date and number of this resolution.


SECTION 2. This resolution shall be transmitted to the Federal Transit Administration and other funding agencies as appropriate.

SECTION 3. That all provisions of the resolutions of the Board of Directors of the DCTA, in conflict with the provisions of this resolution be, and the same are hereby, repealed, and all other provisions not in conflict with the provisions of this resolution shall remain in full force and effect.

SECTION 4. This resolution shall become effective immediately upon its passage and approval.

DULY PASSED AND APPROVED BY THE BOARD OF DIRECTORS OF THE DENTON COUNTY TRANSPORTATION AUTHORITY THE 28TH DAY OF APRIL, 2022.

APPROVED:



Cesar Molina, Chair

ATTEST:


Dianne Costa, Secretary



Appendix B – Title VI Notice to the Public

**DENTON COUNTY
TRANSPORTATION
AUTHORITY**

Title VI Policy


The Denton County Transportation Authority (DCTA) designs and operates services and programs without regard to gender, race, color, national origin. For more information regarding the commitment of DCTA to non-discrimination, please contact our offices using the information below. If you feel you or another person has been discriminated against by the actions of the DCTA or its employees, please address your complaint using the information below.

DCTA diseña y opera servicios y programas sin tomar en consideración alguna hacia el género, raza, color y nacionalidad. Para más información relacionada al compromiso de DCTA de no-discriminación por favor contacte nuestras oficinas usando la información proveída abajo. Si usted siente que usted u otra persona ha sido discriminada por las acciones de DCTA o de sus empleados por favor dirija su queja usando la información proveída abajo.

The Denton County Transportation Authority (DCTA) nih hin nu le pa, miphun, taksa, ratnak ram zelhmanh tleidang lo tein bawmhchannak le rian hi a ser i a tuan. DCTA i an i nautat zuamtiahnak dohnak kong he an i pekchannak kong he pehtlai in tam deuh theih na duh ahcun a tang lei ning in kan zung ah pehtlainak rak kan tuah te. Nangmah na siloah midang pakhatkhat nih DCTA asiloah riantuantu pakhatkhat i nautat zuamtaihnak nan ton asiahcun a tang lei ning in theihternak rak kan tuah te.

Denton County Transportation Authority
P.O. Box 96 • Lewisville, TX 75067
972.221.4600 • dctainfo@dcta.net

RideDCTA.net • 940.243.0077



HopOnBoardBlog.com • #RideDCTA

Appendix C – Title VI Complaint Procedures and Forms

English, Spanish, and Hakha Chin

TITLE VI PROCEDURE

DCTA has established a process for passengers to file a complaint under Title VI. Any person who believes that he or she has been discriminated against on the basis of race, color, or national origin by DCTA or its contract operators may file a Title VI complaint by completing and submitting the agency's Title VI Complaint form available at DCTA administrative office, DCTA's Downtown Denton Transit Facility or on our website at www.dcta.net.

DCTA encourages complaints to be filed immediately. DCTA will investigate complaints up to 180 days after the alleged incident. DCTA will process complaints that are complete. Once the complaint is received, DCTA will review it and the complainant will receive an acknowledgement letter within 10 working days informing them whether the complaint will be investigated by DCTA.

Complaints can be filed in writing using the Title VI Complaint form or verbally by calling 972-221-4600. Completed forms are mailed to DCTA's Administrative Office at P.O. Box 96, Lewisville, Texas 75067. A person may also file a complaint directly to FTA's Office of Civil Rights at 1200 New Jersey Avenue SE in Washington, DC 20590.

DCTA has up to 30 days to investigate the complaint. If more information is needed to resolve the case, DCTA may contact the complainant. The complainant has 30 days from the date of the letter to send requested information to the investigator assigned to the case or the case could be administratively dismissed. A case may also be administratively dismissed if the complainant no longer wishes to pursue their case.

DCTA's Title VI Coordinator conducts all investigations in cooperation with the Human Resources Department and the General Counsel. The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant and other affected parties may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

Based upon all the information received and discovered during the investigation, an investigation report will be written by the Title VI Coordinator for submittal and final determination by the DCTA President.

Once the final determination is made, the complainant will receive a letter stating the final decision. The letter will either be a letter of finding or a closure letter. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. The closure letter will also include information about the complainant's right to appeal the decision within 10 days. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, explains whether any disciplinary action, additional training of the staff member or other action will occur, and the right to appeal the decision within 10 days.

If the complainant simultaneously files a complaint with DCTA and with an external organization such as the state or federal government, the jurisdiction and investigation of the external agency will supersede DCTA's procedures and DCTA's investigation will be suspended.

PROCEDIMIENTO DEL TÍTULO VI

DCTA ha establecido un proceso para que los pasajeros presenten una queja bajo el Título VI. Cualquier persona que crea que ha sido discriminada por motivos de raza, color o nacionalidad por DCTA o sus contratistas puede presentar una queja que cumpla con el Título VI completando y enviando el formulario de Queja del Título VI de la agencia, que se encuentra disponible en la oficina administrativa de DCTA, en el Centro de Tránsito de DCTA del Centro de la ciudad de Denton o en nuestro sitio web en www.dcta.net.

DCTA insta a los demandantes a presentar las quejas inmediatamente. DCTA investigará las quejas hasta 180 días después de sucedido el presunto incidente. DCTA procesará las quejas que estén completas. Una vez recibida la queja, DCTA la revisará y el demandante recibirá una carta de reconocimiento dentro de los 10 días hábiles posteriores a su recepción, en la que se le informará si la queja será investigada por DCTA o no.

Las quejas se pueden presentar por escrito usando el formulario de Queja del Título VI, o verbalmente llamando al 972-221-4600. Los formularios completados se envían por correo a la Oficina administrativa de DCTA a la siguiente dirección: P.O. Box 96, Lewisville, Texas 75067. Una persona también puede presentar una queja directamente a la Oficina de Derechos Civiles de la FTA en 1200 New Jersey Avenue SE en Washington, DC 20590.

DCTA cuenta con hasta 30 días para investigar la queja. Si se precisa más información para resolver el caso, DCTA puede contactar al demandante. El demandante tiene 30 días a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso; de lo contrario el caso puede ser desestimado administrativamente. Un caso también puede ser desestimado administrativamente si el demandante ya no desea proseguir con su caso.

El Coordinador del Título VI de DCTA lleva adelante todas las investigaciones en cooperación con el Departamento de Recursos Humanos y el Director de Asesoría Jurídica. La investigación puede incluir una discusión(es) sobre la queja con todas las partes afectadas para determinar el problema. El demandante y las otras partes afectadas pueden ser representados por un abogado o por otro representante de su elección, y pueden aportar testigos y presentar testimonios y evidencia durante el transcurso de la investigación.

A partir de toda la información recibida y exhibida durante la investigación, el Coordinador del Título VI escribirá un informe sobre la investigación para presentarlo al Presidente de DCTA, quien tomará la decisión final.

Una vez tomada la decisión final, el demandante recibirá una carta que contendrá la decisión final. La carta será una carta de resultados o una carta de cierre. Una carta de cierre resume las acusaciones y afirma que no existió una violación del Título VI y que el caso se cerrará. La carta de cierre también incluirá información acerca del derecho de apelación del demandante dentro de los 10 días posteriores. Una carta de resultados resume las acusaciones y las entrevistas con respecto al presunto incidente,

explica si tendrá lugar cualquier medida disciplinaria, capacitación adicional del miembro del personal u cualquier otra acción, y el derecho a apelar la decisión dentro de los 10 días posteriores.

Si el demandante presenta una queja de manera simultánea ante DCTA y ante una organización externa como el gobierno del estado o el gobierno federal, la jurisdicción e investigación de la agencia externa reemplazará a los procedimientos de DCTA y la investigación de DCTA se suspenderá.

TLANGTAR VI THIL KALNING

DCTA nih hin Tlangtar VI tangah lungtlinlonak langhter khawhnak a tuah. Ahohmanh nih miphun, taksa, ratnak ram hna ruangah DCTA le rian ngeih tu pakhatkhat sinin nautat zuamtaih ka tong tiah aa ruah asi ahcun Tlangtar VI ning in lungtlinlonak cu Tlangtar VI lungtlinlonak catlap ah tial in DCTA Tawlreeltu Zung, , DCTA's Downtown Denton Transit Facility ah siseh kan maivan www.dcta.net. Ah siseh arak tial khawh.

Lungtlinlonak a um ahcun makhat te ah chim colh lengmang dingin DCTA nih a duh. Lungtlinlonak langhter hnu ni 180 chung ah DCTA nih hlattlainak a tuah lai. Lungtlinlonak tlamtling te I tuahmi pawl cu DCTA nih rian a thok colh lai. Lungtlinlonak ca a hmuh le cangka, DCTA nih a zohfel lai i, lungtlinlonak catial tu sinah an lungtlinlonak hlattlai piak an si lai maw si lailo timi cu ni 10 chungah thawng an thanh than lai.

Tlangtar VI Lungtlinlonak Catlap mang in siseh, mah te bakin 972-221-4600 ah auh in siseh lungtlinlonak langhter khawh asi. Ca cu tlamtling te in DCTA Tawlreeltu Zung e P.O. Box 96, Lewisville, Texas 75067 ah na kuat lai. Na duh ai ahcun FTA's Office of Civil Rights at 1200 New Jersey Avenue SE in Washington, DC 20590 zongah kuat khawh asi thiamthiam.

DCTA nih hin a tlawmbik ni 30 chung tal lungtlinlonak langhter mi kong ah hlatltainak a tuah lai. Theih aherhmi a um rih ahcun lungtlinlonak a lang tertu sinah DCTA nih a hal chap lai. Lungtlinlonak a lang tertu nih ca a kuat hnu ni 30 chungah thil cang kong hlattlai piak dingin a hal khawh bantukin, hlattlai ti lo ding zongain a hal khawh. Hi thil cang kongah an peh duh tilo asi ahcun lungtlinlonak langhter tu pehzulh tilo dingin a um khawh.

DCTA i Tlangtar VI kong Bawmchantu nih Human Resources Zung le General Counsel he i bawm in hlattlainak a tuah lai. Hi hlattlainak ahhin lungtlinlotu le nawlbualtu hna remdaihnak tuahnak ding caah bia i ruah tinak zong aa tel kho. Lungtling lotu le a dangdang pawl nih hin anmah aiawhtu an ngei lai I cucu anmah te in an I thim chommi zong asi kho thiamthiam/ cun hi thil cang kong i a hmumi midang le thildangdang zonh an ratpi khawh.

Hi hlatltainak chung i a ummi le hmuhmi thil hna chirhchan in, hlatlainak theihternak ca cu Tlangtar VI bawmchantu niha tial lai i a hnu bik apnak le biakhiahnak caah DCTA Hotu sinah a kuat lai.

Biakhiahnak an tuah khawh le cangka, lungtlinglotu sinah biakhiahnak ca kuat colh asi lai. Cu ca cu thilcang kong cung i hmuhmi asiloah tuaktaanmi kong asi lai. Tuaktaanmi ca ahcun Tlangtar VI ning in nautat zuamtaihnak a um lo zia tu langhter asi lai. Tuaktaanmi ca chungah lungtlinlotu nih biakhiahnak cung i a lungtlinlo asiahcun ni 10 chungah a chal tthan khawh timi zong aa tel lai. Thilcang cung I hmuhnak ca ahcun thil a cangmi vialte le biahnak le bia I ruahnak vialte le hi thil kongah zeitindah dantatnak le remhnak a um lai timi le himinung pawl cawnnak pekchap ding kong le thildang dagn kongah ni 10 chungah zungah chimh tthan khawhnak nawl pawl tial asi lai.

Lungtlinglotu nih DCTA kongah lungtlinlonak DCTA sinah siseh adang zung tate le pengtlang zung tibantuk ahsiseh pehzulh in voi tampi a langhter ahcun, biakhiahnak le hlattlainak hi DCTA nih tuah tiloin, cu bu dang pawl nih an pehzulh lai I DCTA nih peh tilo in a ngol ta rih lai.



Title VI Complaint Form
Denton County Transportation Authority (DCTA)

DCTA is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact the Title VI coordinator by calling (972) 221-4600. The completed form must be returned to DCTA, P.O. Box 96, Lewisville, Texas 75067.

Your Name:	Phone:
Street Address:	Alt Phone:
	City, State & Zip Code
Person(s) discriminated against (if someone other than complainant):	
Name(s):	
Street Address, City State & Zip Code:	

Which of the following best describes the reason the alleged discrimination took place? (Circle one)

- Race
- Color
- National Origin (Limited English Proficiency)

Date of the Incident:

Please describe the alleged discrimination incident. Provide the names of and titles of all DCTA employees involved if available. Explain what happened and who you believe was responsible. Please use the back of this form if additional space is required.

Complete reverse side of form

Title VI Complaint Form
Denton County Transportation Authority (DCTA)

Describe the alleged discrimination incident (continued)

Have you filed a complaint with any other federal, state or local agency? (Circle one) Yes / No
If so, list the agency/agencies along with their contact information below:

Agency:	Contact Name:
Street Address, City State & Zip Code:	Phone:
Agency:	Contact Name:
Street Address, City State & Zip Code:	Phone:

I affirm that I have read the above charge and it is true to the best of my knowledge and belief.

Complainant Signature

Date

Print or Type Name of Complainant

Date Received: _____ Received By: _____
--



Formulario de Queja Título VI
Autoridad de Transporte del Condado Denton (DCTA)

DCTA está comprometido con asegurar que nadie sea excluido de participar o sea negado los beneficios de sus servicios basado en raza, color u origen nacional, conforme a lo dispuesto por el Título VI del Acta de Derechos Civiles de 1964, en su forma enmendada. Quejas de Título VI deben ser sometidas dentro de 180 días de la fecha del presunto incidente de discriminación.

La siguiente información es necesaria para asistirnos en procesar su queja. Si usted requiere asistencia para llenar este formulario, por favor comuníquese con un coordinador de Título VI llamando al (972) 221-4600. El formulario completo debe regresarse a DCTA, P.O.Box 96, Lewisville, Texas 75067.

Su Nombre:	Numero de teléfono:
Dirección:	Número de teléfono sustituto:
	Ciudad, Estado & Código Postal
Persona(s) discriminada(s) (si es alguien aparte del acusador):	
Nombre(s):	
Dirección, Ciudad Estado & Código Postal:	

¿Cuál de los siguientes mejor describe la razón por la cual el presunto incidente de discriminación ocurrió?(Circular uno)

- Raza
- Color
- Origen Nacional (competencia de Ingles limitada)

Fecha del incidente:

Por favor describa el presunto incidente de discriminación. Proporcione los nombres y títulos de todos los empleados de DCTA involucrados si es posible. Explique lo sucedido y quien usted cree que fue responsable. Por favor utilice el lado reverso de este formulario si requiere de espacio adicional.

Complete el lado reverso de este formulario

Formulario de Queja Título VI
Autoridad de Transporte del Condado Denton (DCTA)

Describa el presunto incidente de discriminación (continuado)

¿Usted ha sometido una queja con alguna otra agencia federal, estatal o local? (Circular uno) Si/No. De ser así, nombre la agencia/agencias con su información de contacto:

Agencia:	Nombre de contacto:
Dirección, Ciudad Estado & Código Postal:	Teléfono:
Agencia:	Nombre de contacto:
Dirección, Ciudad Estado & Código Postal:	Teléfono:

Yo afirmo que he leído el cargo previo y que este es verdadero de acuerdo a mi mejor entendimiento y creencia.

Firma del acusador

Fecha

Escriba a mano o por computadora el nombre del acusador

Fecha de Recibo: _____ Recibido Por: _____



A tang lei thil pawl hi theihternak na tuahnak ah bawmchantu dingah aherhmi an si. Hi catlap kongah bawmhnak na herh ahcun, Tlangtar VI nak bawmchantu sinah (972) 221-4600 bawmh halh khawh asi.. Hi cca chugn thil pawl na tial dih hnu ah atang lei hmun ah na kuat lai DCTA, P.O. Box 96, Lewisville, Texas 75067.

Na Min:	Phone:
Na umnak:	Phone dang:
	Khua, State & Cabuk Nambat
Nautat zuamtaih a tongmi (hica tialtu asilomi a dang pakhatkhat):	
Min (pawl)	
Umnak, Khua, State & Cabuk Nambat	

Thil a can ni:

- Miphun ruangah
- Taksa
- Rammi sinak (Mirang hol le ca thiam lo ruangah)

Nautat zuamtaihnak na tonnak kong cu hika ah tial. Hi kong i aa telmi DCTA upat pawl min le rengh na theih khawh tak na tial lai. Thil a cangmi tial law, ahonih dah tuanvo ngei bik tiah na ruah timi zong tial chih. Cahmai dang na herh asi ahcun hika catlap a hnu lei zongah tial ko.

[illegible]

Hi catlap a hnu zongah tial chap rih

Tiangtar VI Lungtlin Lonak Chimhnak Catlap
Denton County Transportation Authority (DCTA)

Thil cangmi zeipauh tial (a peh)

Hmun dang, state dang le khua zung pakhatkhat ah lungtlinlonak ca na kuat bal maw? Pakhat I thim kuat/ kuatlo
Ti sicun, cuka phu pawl hi an konglam cu a tang lei ah tial.

Phu min:	Pehtlaihnak Min:
Umnak, Khua, State & Cabuk Nambat	Phone:
Phu min:	Pehtlaihnak Min:
Umnak, Khua, State & Cabuk Nambat	Phone:

A cung lei thilcang pawl hi that e in ka reel i lungthiang le le zumhnak in ka feh ter.

Lungtling lo tuMinsenthut Ni

Lungtling Lotu hi Min tial

Hmuh Ni: _____ A Cohlang tu: _____

Appendix D – Title VI Complaint Documentation

FY 2018 – One complaint filed against DCTA with the legal opinion of “no findings.”

FY 2019 - No complaints/lawsuits were filed against DCTA

FY 2020 - No complaints/lawsuits were filed against DCTA

FY 2021 - No complaints/lawsuits were filed against DCTA

Appendix E – Outreach Efforts, Community Advisory Committee Meetings, and Social Services Agency Roundtable Meetings

April to June 2021

- April 19 – June 25, 2021
 - GoZone On-Demand Service Implementation and Impacts to other Services

June 2020

- June 15 – 26, 2020
 - DCTA's COVID-19 Response
 - Proposed Service Change Modification Overview
 - Proposed Connect Bus Service Modifications
 - Proposed A-train Service Modifications
 - On-Demand Service Modifications
 - University of North Texas Service Modifications
 - City of Coppell Lyft Program Continuation
 - Title VI Analysis

October 2019

- October 14, 2019
 - Annual Program of Projects

May 2019

- May 1 – 31, 2019
 - A-train Service Changes
 - Denton Connect Route Changes
 - Denton Enterprise Airport Zone Expansion
 - UNT Shuttle Route Changes
 - University Pass Program Fares

May 2019

- May 28, 2019
 - Old Town Station Expansion Property Acquisition Meeting

Community Advisory Committee Meetings

- 2019
 - Lewisville
 - Tuesday, July 9
 - Tuesday, October 8
 - Denton
 - Thursday, July 11
 - Thursday, October 10

Social Services Agency Roundtable Meetings

- 2022
 - Lewisville
 - Tuesday, February 8
 - Tuesday, May 10
 - Denton
 - Thursday, February 10
 - Thursday, May 12

- **2021**
 - Lewisville
 - Wednesday, March 10
 - Tuesday, May 18
 - Tuesday, August 17
 - Tuesday, October 19
 - Denton
 - Wednesday, March 10
 - Thursday, May 20
 - Wednesday, August 18
 - Thursday, October 21
- **2020**
 - Lewisville
 - Wednesday, February 19
 - Wednesday, July 8
 - Tuesday, October 27
 - Denton
 - Thursday, February 20
 - Wednesday, July 8
 - Thursday, October 29
- **2019**
 - Lewisville
 - Wednesday, February 6
 - Wednesday, May 1
 - Wednesday, August 7
 - Wednesday, November 6
 - Denton
 - Thursday, February 7
 - Thursday, May 2
 - Thursday, August 8
 - Thursday, November 7

Denton	Date	NOTES
Denton CVB Advisory Council meeting	October 1, 2018	Attended board meeting and shared DCTA updates
CAT meeting outreach	October 1 - 5	Outreach for upcoming CAT meetings via email to GovDelivery and routine care and feeding
General Community Outreach	October	Emails and phone calls to Denton Apts, Denton Neighborhood Assoc., SEDNA
Denton Airport Zone Outreach Target meeting	October 4, 2019	Email outreach and communication with Amber Beltrain Target HR Generalist
Route Guide and SFOT outreach	October 4, 2018	Delivered to Lewisville CVB, Denton CVB and Denton Welcome Center
Denton Airport Zone Outreach Peterbilt meeting	October 5, 2018	Meeting with Terry Harmon
Denton Airport Zone Outreach WinCo Foods meeting	October 7, 2018	Meeting with Monica Odom, HR Generalist
Denton Airport Zone WinCo meeting	October 17, 2018	
General Community Outreach	November	Emails and phone calls to Denton Apts, Denton Neighborhood Assoc., SEDNA

Denton	Date	NOTES
Holiday Express	December 1, 2018	Worked with Denton County Friends of the Family
Denton Airport Zone Outreach	December 11 & 12, 2018	Bag drop out reach to 61 businesses in DAZ zone. Business names/list available on S: drive S:\COMMUNICATIONS & MARKETING\Public Involvement\Community Outreach
Route Guide drop		Denton CVB, Discover Denton, UNT, TWU, NCTC
General Community Outreach	December	Emails and phone calls to Denton Apts, Denton Neighborhood Assoc., SEDNA
CAT meeting outreach	January 21 - 25, 2019	CAT outreach, routine care and feeding, emails sent as reminders of upcoming meetings
General Community Outreach	January	Emails and phone calls to Denton Apts, Denton Neighborhood Assoc. Assoc., SEDNA
UNT flyer drop off	January 24	Dropped UNT specific flyers to Trista Moxley
Denton Black Film Festival	January 25, 2019	Film panel moderator
Denton Social Services Roundtable	February 7, 2019	
Social Service Agency Outreach	February 21, 2019	SSA Roundtable follow-up and survey
Denton Holiday Lighting Festival meeting	March 6, 2019	
General Community Outreach	March	Emails and phone calls to Denton Apts, Denton Neighborhood Assoc., SEDNA
Social Service Agency Outreach	March 1	Inclement Weather Plan update
Denton Holiday Lighting Assoc. Meeting	October 2, 2019	
Denton CAT Meeting	October 10, 2019	
Denton County Friends of the Family	December 7, 2019	
Discover Denton Advisory Board	January 6, 2020	
Rails to Trails Opening Day Planning Committee Meeting	January 16, 2020	

Denton	Date	NOTES
Denton Black Film Festival Opening Night Concert and Reception	January 24, 2020	
Denton Black Film Festival Family Shorts presentation	January 27, 2020	
CAT Denton	January 30, 2020	
City of Denton Art & Jazz Festival Meeting	February 7, 2020	
Rails to Trails Opening Day Planning Committee Meeting	February 12, 2020	
SSA Denton	February 20, 2020	
Denton High Noon Kiwanis	February 24, 2020	
Service Changes Calls	March 20, 2020	
Community Advisory Committee Meeting	April 15, 2020	
Denton Chamber of Commerce Meeting	April 15, 2020	
Community Education Outreach Emails (PTA and Pre-schools)	April 16, 2020	
Community Advisory Committee Bike Month Email	May 5, 2020	
EPP Program Mailing	May 11, 2020	
Service Change Outreach Letters	May 11, 2020	
Denton Chamber Zoom Marketing Meeting	May 19, 2020	
Homeless Coalition Denton	June 11, 2020	
Safety Kids Coloring Sheets	June 2020	
Survey to Social Services Agency	June 15, 2020	
Email to curated Outreach List re: Public Meeting	June 17, 2020	
Social Services Agency Virtual Meeting – Train the Trainer	July 8, 2020	

Denton	Date	NOTES
Delivery of PPE masks to Nonprofits	July 9, 2020	
Outreach email re: Mask Requirements	July 20, 2020	
Community Partner emails	August 5, 2020	
Emails about RAC meetings	August 7, 2020	
Denton ISD New Teacher Welcome	August 7, 2020	
RAC	August 20, 2020	
Community Advisory Committee	August 20, 2020	
Route Guide Distribution	August 26, 2020	
Denton Radio Sponsor	September 2020	
Denton ISD Peachjar Flyer	September 15, 2020	
Community Advisory Committee Meeting	January 2021	
Denton Black Film Festival Free Ride Promo & Sponsorship	Late January 2021	
Social Services Agency Denton	January 2021	
Train the Trainer	February 2021	
TMS Vaccination Shuttle	February 26, 2021	
April Community Advisory Committee	April 14, 2021	
Social Service Agency Roundtable Forums	March 10, 2021	
GoZone Public Involvement	April 19-June 25, 2021	
Celebrate Tails Day Event (Self-Guided/Virtual)	April 24, 2021	
Safety Education Parks and Rec	March – June 2021	
Juneteenth Sponsorship	June 2021	
New Teachers Denton ISD	July 2021	
TWU Pioneer Week Planning	August 2021	

Denton	Date	NOTES
August Social Service Agency Roundtable Forum	August 2021	
GoZone Service Launch	September 7, 2021	
State Fair of Texas	September 2021	
Denton Art and Jazz	October 1, 2021	
Community Advisory Committee	October 19, 2021	
Social Services Agency Denton	October 2021	
Our Daily Bread	December 8, 2021	
Community Outreach News	December 8, 2021	
GoZone Posters	February 1, 2022	
Denton Ministerial Alliance Meeting	February 12, 2022	
Social Services Agency Denton	February 10, 2022	
Point Bank Denton Breakfast	March 1, 2022	
Thin Line Festival	March 7, 2022	
DDTC Service Change Route Guides	March 10, 2022	
GoZone Listening Sessions	March 25, 2022	

Lewisville	Staff Name	Date	NOTES
Outreach to Affected Property/Business Owner (Old Town Station Expansion)		February 11, 2019	In person discussions with Mr. O'Malley about acquisition of property moving past land swap
Editorial meeting with Community Impact (Lewisville/Highland Village/Flower Mound edition)	Adrienne H.	October 3, 2018	Quarterly meeting with Community Impact about editorial ideas and stories
General Community Outreach	Kelly B	October	Emails and phone calls to Lewisville Apts, Lewisville Neighborhood Assoc., Lewisville Neighborhood Outreach city staff
Advertorial meeting with Community Impact	Adrienne H.	October 24	Advertorial meeting to discuss strategic marketing opps

Lewisville	Staff Name	Date	NOTES
Senior Networking Breakfast	Kelly B.	October 17, 2018	
Lewisville CVB	Kelly B.	October	Monthly visit with Kent Boring
Lewisville Chamber Luncheon	Kelly B./Nicole R	October 23, 2018	
General Community Outreach	Kelly B	October	Emails and phone calls to Lewisville Apts, Lewisville Neighborhood Assoc., Lewisville Neighborhood Outreach city staff
Lewisville CVB	Kelly B.	November	Quarterly visit with Kent Boring
Lewisville Community Expo	Kelly B./Adrienne H./Kayleigh B.	November 3, 2018	
Senior Services Alliance Networking Breakfast	Kelly B.	November 28, 2018	
Lakeway Zone Outreach	Kelly B./Kiera G.	December 15	101 letters mailed to Lakeway Zone Businesses, business names/list located on S: drive
General Community Outreach	Kelly B	October	Emails and phone calls to Lewisville Apts, Lewisville Neighborhood Assoc., Lewisville Neighborhood Outreach city staff
Lakeway Zone Outreach	MarCom Staff	December 17 - 21, 2018	Schedule ride arounds to talk to passengers about upcoming service changes affecting Route 21/22
Lakeway Zone Outreach	Kiera G	January 8 & 9, 2019	Bag drops to local businesses; included Spanish guides
Lewisville CVB Route Guide drop	Kiera G.	January 16, 2019	
General Community Outreach	Kelly B	January	Emails and phone calls to Lewisville Apts, Lewisville Neighborhood Assoc., Lewisville Neighborhood Outreach city staff
Lewisville Chamber Luncheon	Kelly B./Nicole R.	January 22, 2019	
CAT meeting outreach	Kelly B.	January 21 - 25, 2019	CAT outreach, routine care and feeding, emails sent as reminders of upcoming meetings
Lakeway Zone Route Guide drop	Kiera G.	January 21	Dropped extra Lakeway Zone and Routes 21,22 to apartments in zone, including Spanish guides
Lewisville Round Table	Kelly B.	February 1, 2019	

Lewisville	Staff Name	Date	NOTES
DCTA Social Services Roundtable	MarCom Staff	February 6, 2019	
General Community Outreach	Kelly B	February	Emails and phone calls to Lewisville Apts, Lewisville Neighborhood Assoc., Lewisville Neighborhood Outreach city staff
Lewisville CVB Route Guide drop	Kiera G.	February 13, 2019	
Lewisville Area Chamber Healthcare Alliance	Kelly B.	February 13, 2019	
TWU Career & Internship Fair	Kelly B.	February 13, 2019	
Chin Festival	Kelly B./Kiera G.	February 19, 2019	Outreach to Chin Community
Social Service Agency Outreach	Kelly B./Kiera G.	February 21, 2019	SSA Roundtable follow-up and survey
State of the Cities Luncheon	Adrienne H./Kiera G.	February 26, 2019	
Lewisville CVB Route Guide drop	Kiera G.	February 27, 2019	
Route guide drops to Lewisville City Hall	Kiera G.	March 4, 2019	
General Community Outreach	Kelly B	March	Emails and phone calls to Lewisville Apts, Lewisville Neighborhood Assoc., Lewisville Neighborhood Outreach city staff
Social Service Agency Outreach	Kiera G./Kelly B.	March 1	Inclement Weather Plan update
Lewisville Senior Center – Flower Mound Lyft		October 7-11, 2019	
Lewisville CAT Meeting		October 8, 2019	
Lewisville Movement on the Parkway		October 19, 2019	
TWU Commuter Luncheon		October 22, 2019	
Charles Emergy Old Town Station Renaming		October 29, 2019	
Lewisville Expo		November 2, 2019	
Evergreen Senior Living Access Presentation		November 13, 2019	
TWU Apartment Fair		November 14, 2019	
Lewisville ISD Resource Fair		November 21, 2019	

Lewisville	Staff Name	Date	NOTES
Lewisville Chamber LEADS		January 17, 2020	
Lewisville Chin Community meeting		January 24, 2020	
Chin Represented Email		January 25, 2020	
Lewisville Chamber Luncheon		January 28, 2020	
CAT Lewisville		January 28, 2020	
Lewisville Latino Meeting		February 6, 2020	
Social Services Agency Lewisville		February 19, 2020	
Chin Family Festival		February 20, 2020	
City of Lewisville Roundtable Meeting		February 28, 2020	
Lewisville ISD Career Out		March 3, 2020	
Special Populations Outreach		March 27, 2020	
Lewisville Chamber LEADs		April 2020	
Lewisville Chamber Tuesday Tips Zoom Meeting		April 28, 2020	
Lewisville Chamber LEADs		May 2020	
Lewisville Morning Rotary Club Speaker		May 28, 2020	
Sounds of Lewisville at Home		June 2020	
Sounds of Lewisville at Home		July 2020	
Lewisville Chamber Partner Lunch		September 15, 2020	
Social Services Agency Lewisville		January 2021	
Safety Education Parks and Rec		March – June 2021	
New Teachers Lewisville ISD		July 2021	
August Social Service Agency Roundtable Forum		August 2021	
City of Lewisville Employees Go Zone		October 7, 2021	
Social Services Agency Lewisville		October 2021	

Lewisville	Staff Name	Date	NOTES
LHS Homecoming Parade		October 20, 2021	
Lewisville ISD Independence ES Career Day		November 18, 2021	
GoZone Flyer Distribution (Lewisville Convention and Visitors Bureau, Salvation Army, CCA Food Pantry)		January 25, 2022	
Social Services Agency Lewisville		February 8, 2022	
Lewisville Chamber Board Meeting		February 17, 2022	
Lewisville ISD Career Out		March 1, 2022	
CARE Program TWU GoZone		March 2022	
Mill Street Career Day		March 10, 2022	
Evergreen Senior Adult GoZone Preso		March 18, 2022	

Highland Village	Staff Name	Date	NOTES
General Community Outreach	Kelly B.	October	Email and phone calls to Highland Village Neighborhood Associations
Editorial and advertorial meeting with Cross Timbers Gazette	Adrienne H.	October 5, 2018	Quarterly editorial and advertorial meeting to discuss strategic marketing opps and story ideas
General Community Outreach	Kelly B.	November	Email and phone calls to Highland Village Neighborhood Associations
Shops of Highland Village	Kelly B.	November	Phone call
General Community Outreach	Kelly B.	December	Email and phone calls to Highland Village Neighborhood Associations
General Community Outreach	Kelly B.	January	Email and phone calls to Highland Village Neighborhood Associations
Highland Village Luncheon	Kelly B.	January 8, 2019	
Highland Village Coffee	Kelly B.	March 7, 2019	
General Community Outreach	Kelly B.	March	Email and phone calls to Highland Village Neighborhood Associations
Highland Village Business Association Luncheon		January 14, 2020	
Highland Village/Lyft Business Outreach		March 24, 2020	

Highland Village/Lyft Business Outreach		May 6, 2020	
Highland Village Business Association Lyft Email Blast		June 2, 2020	
Safety Education Parks and Rec		March – June 2021	
Highland Village Festival		June 2021	
Highland Village Business Association		October 5, 2021	
Highland Village Fallen Officers		October 16, 2021	
McAuliffe Chili Festival		March 31, 2022	

Non Member Cities	City	Staff Name	Date	NOTES
University of North Texas	Denton	Adrienne H.	October 23, 2018	UNT Senior Class Client Project Presentation
Drive.ai Campaign	Frisco	Adrienne H.	October	Conference Calls during the month in coordination of drive.ai demo day events (October 22 and 23)
Lake Cities Luncheon	Lake Dallas	Kelly B	November 13	
Non-Profit Leadership Luncheon	Flower Mound	Kelly B.	February 4, 2019	Luncheon with 65 area non-profits.
Air North Texas	Meeting via phone or in Arlington	Kelly B.	January 17, 2019	
Air North Texas	Meeting via phone or in Arlington	Kelly B	March	
UNT Orientation	Denton		January 6, 2020	
Country Inn and Suites			January 3, 2020	
Cross Timbers Rotary			January 10, 2020	
UNT Transfer Orientation			January 9, 2020	
UNT Discovery Park Orientation			January 13-14, 2020	

Non Member Cities	City	Staff Name	Date	NOTES
UNT Open House and Orientation			February 4, 2020	
OLLI UNT			February 19, 2020	
UNT Retiree Association			February 25, 2020	
Trip Planning for Hodges Family			February 26, 2020	
State of the Cities Luncheon			February 25, 2020	
Point Bank Business Breakfast			March 12, 2020	
Heritage ES Mystery Reader (Facebook)			April 3, 2020	
Flower Mound Chamber Zoom Lunch			April 21, 2020	
Mind Your Business Radio Show			May 9, 2020	
Air North Texas Conference Call			May 21, 2020	
How to Get Around Collateral to UNT Students			July 31, 2020	
Healthcare Alliance Zoom meeting			September 2, 2020	
Air North Texas Conference Call			September 18, 2020	
Trail Moments Partner Email			September 18, 2020	
Western Days			September 26, 2020	

Non Member Cities	City	Staff Name	Date	NOTES
North Texas Fair & Rodeo Sponsorship			Mid-August 2021	
UNT Orientation			August, 2021	
UNT First Flight Week Planning			August 2021	
TX Workforce Solutions Training			October 7, 2021	
Go Zone Presentations (Flower Mound and Communities in Schools)			November 16, 2021	
Castle Hills Celebration Event			November 20, 2021	
Pedia Place – GoZone Flyers and Safety Kids			January 21, 2022	
UNT Off Student Housing Fair			January 26, 2022	
Lake Cities Rotary Presentation			February 1, 2022	
GoZone Castle Hills Material			February 1, 2022	
Single Parents Advocates Golf Swag			March 7, 2022	
UNT Off Student Housing Fair			March 30, 2022	

<https://www.dcta.net/media-center/news/2020/denton-county-transportation-authoritys-june-2020-public-meeting-goes-digital>

Appendix F – Public Meeting Advertisement Example



**DROP BY OUR NEXT OPEN
HOUSE MEETING!**

PROPOSED FARE CHANGES

DCTA is recommending a new fare structure in an effort to simplify your fare options and to provide system-wide access. DCTA's Local Fare Promotion is set to expire on January 13, 2019 and be replaced by the new fare structure on January 14, 2019.

OPEN HOUSE TOPIC:

New Fare Structure and Fare Programs Effective January 14, 2019



LEWISVILLE

Saturday, November 3, 2018 | 9:00 a.m. – noon*
Lewisville Community Resource Expo | Next Steps Center
1305 TX-121 BUS | Lewisville, TX 75067

HIGHLAND VILLAGE

Saturday, November 3, 2018 | 10:00 a.m. – 2:00 p.m.*
City of Highland Village Fall Festival | Unity Park
2200 Briarhill Blvd | Highland Village, TX 75077

DENTON

Thursday, November 8, 2018 | 3:00 p.m. – 6:00 p.m.
Downtown Denton Transit Center | Lobby
604 E. Hickory Street, Denton, TX 76205

DENTON

Saturday, November 10, 2018 | 10:00 a.m. – 2:00 p.m.
Denton Welcome Center on the Square
111 W. Hickory St | Denton, TX 76201

ONLINE

Review the presentation and submit feedback online at dcta.net/about-dcta/public-engagement between Monday, October 29, and Friday, November 16.

*Come to this free event and locate the DCTA table for more information.

Everyone is welcome to attend the open house meetings. Those who need materials in large-print or translated in a different language, or persons with hearing or sight interpretive service needs are asked to contact DCTA at least five (5) days in advance of the specific meeting at 940.243.0077 or via email at dctainfo@dcta.net so that DCTA can accommodate requests.

RideDCTA.net • 940.243.0077



HopOnBoardBlog.com • #RideDCTA

Denton County Transportation Authority's June 2020 Public Meeting Goes Digital

June 01, 2020



The Denton County Transportation Authority (DCTA) invites the public to view its online June public meeting video presentation to provide feedback on upcoming proposed agency projects. In lieu of in-person public meetings, DCTA will host its June public meeting presentation online due to the [coronavirus \(COVID-19\) health emergency](#).

The agency regularly holds public meetings to inform and engage with the community regarding DCTA projects, programs and services. DCTA encourages people to provide feedback that will help the agency deliver mobility options that benefit the many communities DCTA serves.

The online video presentation will be available online from Monday, June 15, until Friday, June 26, and will include all the information on the proposed DCTA service changes and projects usually presented during an in-person public meeting.

Appendix G – Major Service Change and Disparate Impact Guidance

In response to FTA guidance, DCTA developed and proposed an updated Major Service Change policy in 2018 to include disparate impact, disproportionate burden considerations, and a better definition of a major service change. DCTA's Board of Directors approved this updated policy on October 25, 2018, as part of DCTA's 2019 Title VI Program update. DCTA no longer operates over 50 peak vehicles and is not required to establish these policies or conduct major service change analyses, according to FTA Advisory Circular 4702.1B Ch IV, Section 4. However, this information has been provided for use should DCTA return to 50 or more peak vehicles or as DCTA elects to conduct these analyses at its discretion.

Disparate Impact

DCTA establishes that a fare change, major service change, or other policy has a disparate impact if the minority populations will experience five (5) percent more of the cumulative burden, or experience five (5) percent less of the cumulative benefit, relative to the non-minority populations. To avoid, minimize, or mitigate disparate impacts, DCTA will develop and assess alternatives and/or modifications to proposed changes that will result in adverse impacts.

DCTA will implement alternatives or modifications to proposed changes to address adverse impacts unless:

- There is substantial legitimate justification for the change, and
- No other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects based on race, color or national origin.

Disproportionate Burden

DCTA establishes that a fare change, major service change, or other policy has a disproportionate burden if low-income populations will experience five (5) percent more of the cumulative burden, or experience five (5) percent less of the cumulative benefit, relative to non- low-income populations unless the disproportionate effects are mitigated.

Major Service Change Policy

A service equity analysis may be conducted whenever the DCTA implements a major service change. A major service change is a change that results in one or more of the following conditions:

- The establishment or elimination of a fixed bus route.
- A substantial geographical alteration on a given route of more than 25 percent of its revenue miles.
- A modification which causes a change in the number of daily revenue hours provided that is equivalent to a 25 percent or greater increase or decrease of the original daily hours provided.

It is important to note that, as of date of this publication, FTA has not established criteria to define a Major Service change for microtransit or on-demand services like GoZone nor has FTA defined disparate impact thresholds for these services. However, DCTA may also apply these metrics to GoZone and other on-demand services using equivalent thresholds.

Fare Change Policy

A fare equity analysis may be conducted whenever the DCTA implements a fare change, regardless of the amount of increase or decrease, except for those changes identified as exceptions in FTA Circular 4702.1B. A fare change is defined as an increase or decrease in fares:

- On the entire system,
- On certain transit modes, or
- By fare payment type or fare media.

Appendix H – Title VI Analyses

Content

- Old Town Station Expansion
- GoZone
- Fall 2020 Service Changes

Old Town Station Expansion – Equity Analysis

Title VI Equity Analysis: Old Town Station Expansion

Background and Purpose

Denton County is the 25th fastest-growing county in United States with over 850,000 residents, according to the U.S. Census Bureau. On November 5, 2002, Denton County approved the creation of the Denton County Transportation Authority (DCTA) to advance public transportation alternatives. DCTA was funded in 2003 by a dedicated half-cent sales tax from the cities of Denton, Lewisville and Highland Village and fulfilled its initial service plan in June of 2011 with the launch of its A-train commuter rail service. In December 2011, DCTA updated its service plan to include system-wide improvements to build on the initial investments and meet the public transit needs caused by the area's dynamic growth. Today DCTA serves nearly three million passengers annually and provides service within Denton and Collin county as well as service into Tarrant and Dallas counties with transit connections to Trinity Metro and Dallas Area Rapid Transit.

DCTA is committed to improving mobility, air quality, economic development and livability in the areas we serve. For the past 16 years, DCTA has accelerated innovative transportation solutions which have been critical to reducing traffic congestion and enhancing air quality, while contributing to orderly growth and development and improving the quality of life for Denton County residents.

DCTA plans to expand its current A-train commuter rail station in Old Town Lewisville through purchase of the John Burns Construction Company property (± 5 acres) located at 655 East Main Street and adjacent to the existing station. Upon buildout, the Old Town Station will encompass an Intermodal Transportation Center (ITC) and future DCTA administrative offices in downtown Lewisville. The expansion's initial phase will reconfigure existing parking and bus lanes to allow for construction of bus transfer facilities to include a roundabout for bus parking/transfers, first/last mile solutions and pedestrian connections, covered bus bays, passenger information booth, sidewalks, curbs, and driveways. At full buildout, the ITC will include a building for passenger amenities and waiting area, community meeting space and will serve as a regional hub connecting DCTA rail and bus routes with first/last mile solutions through direct access to TNC, taxi, rail, trail, and bicycle/pedestrian connections.

DCTA is committed to ensuring that no person is excluded from participation in, or denied benefits of, its transit services based on race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. The requirements specified FTA C. 4702.1B for complying with 49 CFR Section 21.9(b)(3) state that, *"In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part."*

On October 2019, FTA found that DCTA's proposed station expansion qualifies as a *Categorical Exclusion* ("C List", Type 9) in accordance with 23 CFR 771.117(c).

The Title VI equity analysis contained herein is intended to demonstrate that siting for DCTA's planned station expansion was done without regard to race, color or national origin.

Site Selection Process

The approximately five-acre subject parcel (Figure 1) was selected solely due to its size and location immediately adjacent to the southern boundary of the Old Town Station's park-and-ride lot. Title 46 CFR Part 21, Appendix C, Section 3(iv) provides that "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." The site is now being used as a materials yard for the John Burns Construction Company and is owned by the same. The property or construction company is not owned by a Title VI protected class. Table 1 documents in-person outreach activities between DCTA, its representative (Stateside) and the affected property owner.

Table 1: Outreach to Affected Property/Business Owner

Date	Activity
March 22, 2017	In Person Meeting, discuss acquisition and valuation with Mr. O'Malley & representatives, DCTA and Stateside
February 11, 2019	In Person Meeting, new representative for Mr. O'Malley to discuss acquisition
March 13, 2019	In Person Meeting, DCTA & Mr. O'Malley's representative discussed acquisition of property moving past land swap
May 28, 2019	In Person Meeting, In Person Meeting, DCTA, Mr. O'Malley's representative and Stateside discussed acquisition of property moving past land swap

Figure 1

DCTA Intermodal Center/Administrative Office Complex



 **Subject Property**

0 0.05 0.1 Miles



Benefits and Burdens Analysis

While preparing its *Categorical Exclusion Worksheet*, DCTA reviewed benefits and burdens of locating its ITC and administrative offices at the subject property. The existing development context at and around the site is almost entirely non-residential, light industrial uses and is proximate to the City of Lewisville's Old Town Mixed-Use District which is being incrementally (re)developed in a transit-supportive form to include an integrated balance of homes and businesses. Table 2 summarizes benefits and burdens associated with the site.

Table 2: Benefits and Burdens

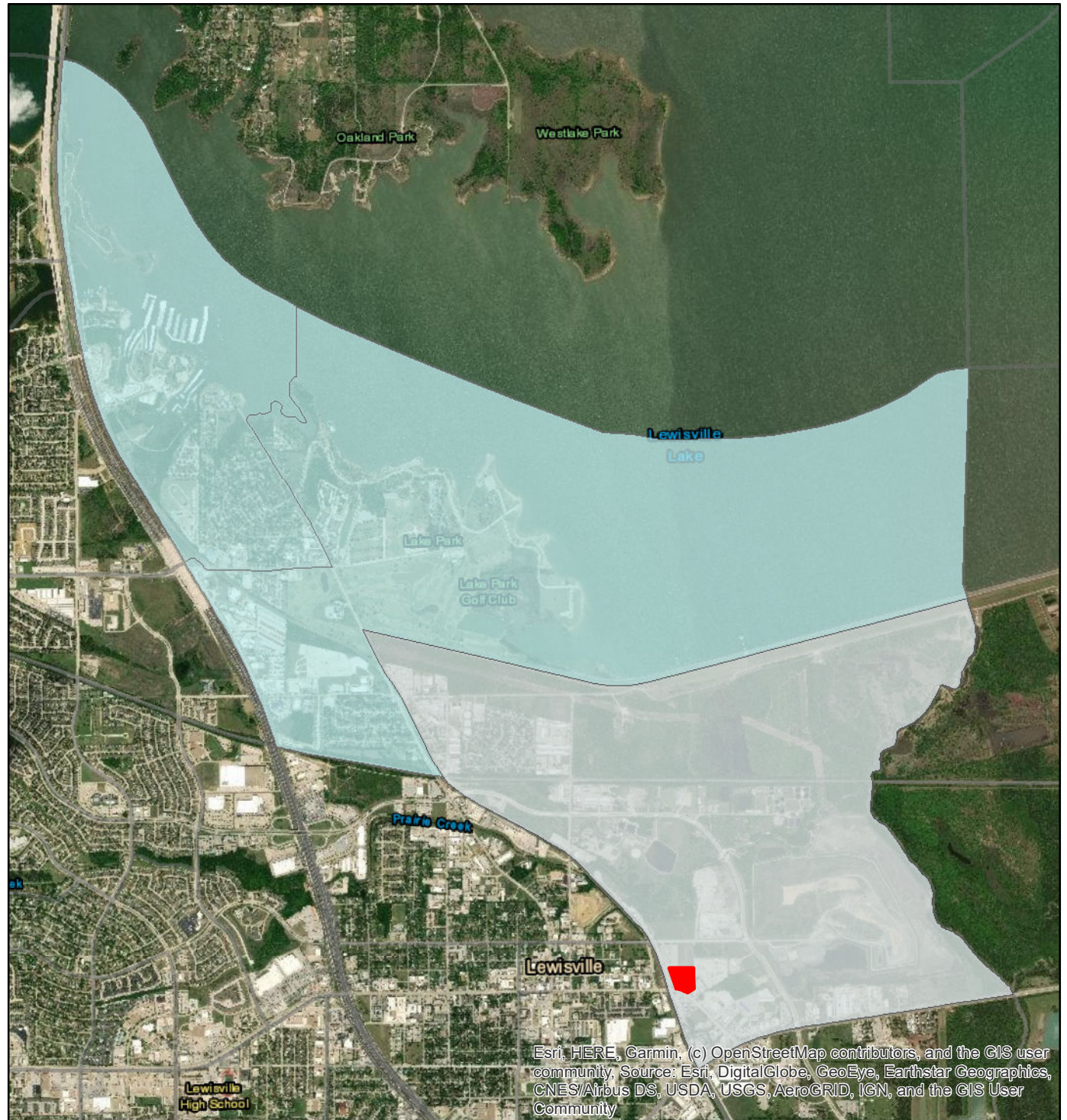
Benefits/Positive Images	Burdens/Adverse Impacts
<ul style="list-style-type: none">• Adjacency to Old Town A-train station• Underdeveloped property• Supportive of City of Lewisville's Main Street redevelopment vision	<ul style="list-style-type: none">• Active business on site

Equity Analysis and Cumulative Impacts

DCTA documented demographics using the 2017 American Community Survey (ACS) 5-year Block Group Estimates associated with the site in ensure its selection did not have yield disparate impacts dues to race, color, or national origin. The site is located entirely within Census Tract 21502, Block Group 3 as depicted in Figure 2. Table 3 presents applicable demographic characteristics associated with Denton County and the Census Tract and Block Group which contain the selected site.

Figure 2

DCTA Intermodal Center/Administrative Office Complex



Census Tract: 21502

Block Group: 3

Subject Property

0 0.5 1 Miles

Table 3: Demographic Characteristics

	Block Group 3 Tract 21502	Tract 21502	Denton County, TX
Total Population	1,242	4,649	859,064
White	1,129	3,560	655,466
Non-White	113	1,089	203,598
Non-White Percent	9%	23%	24%
Percent Below Poverty	35.7%	6.1%	7.3%
Median Household Income	\$32,221	\$86,532	\$83,376
Percent Limited English Proficiency	26.0%	20.3%	23.1%

Source: US Census Geodatabase: 'ACS_2017_5YR_BG_48_Texas.gdb'

Review of demographic characteristics around the site reveals the census block group containing the site contains a significantly lower proportion of non-white persons when compared to the larger census tract or overall Denton County. It is noteworthy that, at the block group level, a significantly higher proportion of households with incomes below the poverty threshold, which is likely due to the location of a large manufactured home community in the block group's northwest corner. No adverse impacts to this low-income community were identified during the NEPA review conducted in support of the *Categorical Exclusion Worksheet* prepared for the site.

Conclusion

Upon review of the documentation contained herein, it is clearly evident that no adverse disparate impacts will result from acquisition of the subject parcel.

GoZone – Title VI – Equity Analysis

DCTA GOZONE TITLE VI AND EQUITY ANALYSIS

April 15, 2022

DCTA GOZONE TITLE VI AND EQUITY ANALYSIS

Prepared for:
Denton County Transportation Authority
1955 Lakeway Drive, Suite 260
Lewisville, TX 75057

Prepared by:
Kittelson & Associates, Inc.
PO Box 256517
Chicago, IL 60625
410.949.5308

Project Manager:
Gibran Hadj-Chikh
Senior Principal Planner

Project Principal:
Mary Raulerson
Senior Principal Planner

Project Number 24618.004

July 9, 2021



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INTRODUCTION

The purpose of this document is to present an analysis of the potential impacts of Denton County Transportation Authority's (DCTA) proposed transition from fixed-route to GoZone on-demand transit services on low-income, minority, and Limited English Proficiency (LEP) populations within DCTA's service area and according to DCTA's current Title VI policy guidance. Title VI guidelines from the Federal Transit Administration (FTA) prohibit transit service changes that disparately impact racial/ethnic minority populations and/or disproportionately burden low-income populations (below 125% federal poverty level in this analysis). Additionally, this analysis considers impacts to people with Limited English Proficiency (LEP).

The full text of DCTA's disparate impact and disproportionate burden policies can be found on the DCTA website.

This methodology is consistent with Federal Transit Administration (FTA) requirements for Title VI analysis; however, as current FTA guidance (as found in Circular 4702.1B, dated October 1, 2012) does not provide explicit direction as to how on-demand services should be analyzed, the study team has provided additional documentation as to how it performed its analysis.

This document is organized as follows:

- Section 1 provides an overview of the proposed changes to DCTA's bus service
- Section 2 summarizes the peer review conducted to understand best practices in Title VI methodology conducted by other transit agencies implementing on-demand service
- Section 3 describes the methodology used to conduct the Title VI analysis of DCTA's proposed transition from fixed-route to GoZone on-demand services
- Section 4 summarizes the results of the initial analysis
- Section 5 provides recommendations associated with this analysis and the proposed GoZone implementation.

According to the methodology used, results of the equity analysis show that the proposed GoZone network results in benefits within the acceptable range for low-income and minority populations, with low-income residents receiving 12.0-13.2% of the service increase in annual person-trips available to them and minority populations receiving 43.4-45.7% of the service increase. Should additional changes be made to service, this analysis would need to be updated.

In addition to this analysis DCTA has conducted a robust outreach and engagement process using demographic information to inform and engage Title VI protected customers and communities. That outreach and results are described in a separate report and are being used to inform decision-makers of concerns to guide service adjustment, data collection, monitoring and outreach important to meeting DCTA's equity goals and objectives.

1. OVERVIEW OF PROPOSED CHANGES

Denton County Transportation Authority (DCTA) is planning to implement GoZone, which will replace the majority of DCTA's existing fixed transit routes with on-demand rideshare service for trips within, and sometimes between, designated zones in Denton County. The project seeks to better serve a wider range of DCTA's service area and provide easy-to-use on-demand rideshare transit service. Immediate implementation will see most fixed-routes be replaced by on-demand service, with future service eliminating all fixed-routes in favor of on-demand service.

1.1 BASELINE SERVICE

In order to understand the potential impacts of the GoZone proposal on populations served by DCTA services, the study team compared service under the GoZone proposal to DCTA services offered in December 2019. The reason for this is that multiple fixed-route services were removed during the COVID-19 Pandemic which would have been considered a Major Service Change under normal circumstances. Comparing the GoZone proposal to pre-COVID operations made it possible to account for the elimination of these routes as well as the addition of GoZone service. In addition, the Highland Village Shuttle is included in the baseline analysis, though this fixed-route service had previously been replaced with on-demand service as part of a pilot project.

This analysis does not include University of North Texas (UNT) Campus Shuttles, which are offered in partnership with the UNT and will remain in-place with GoZone.

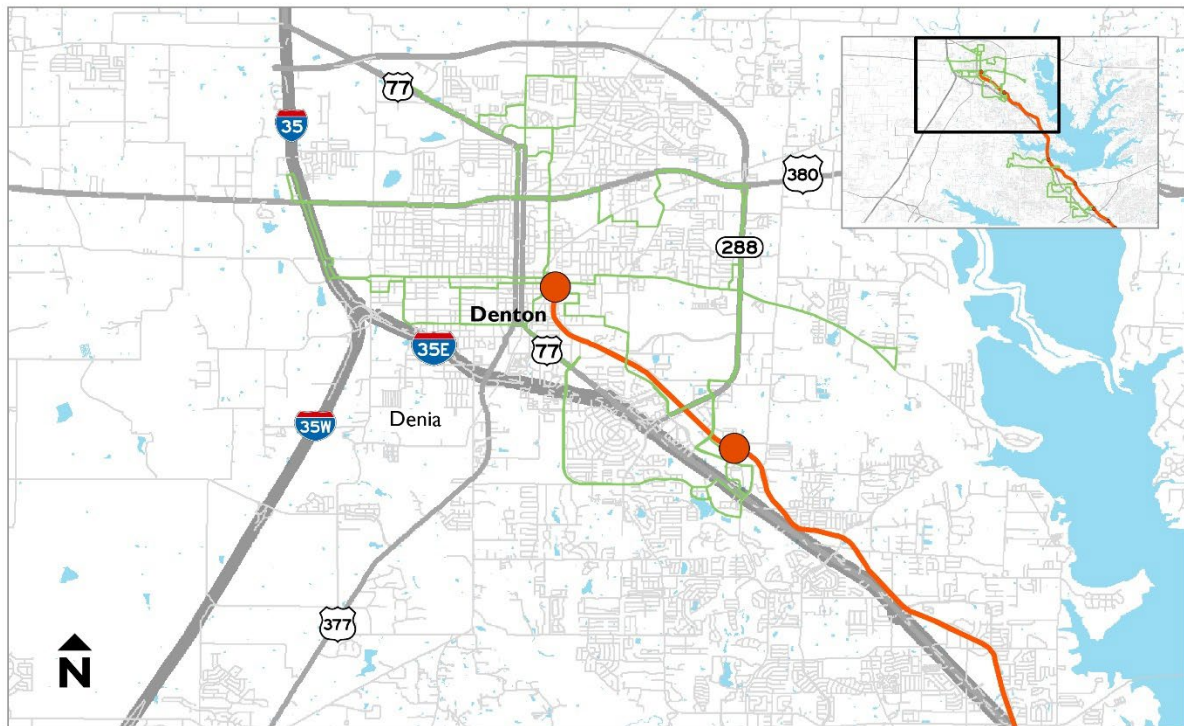
The December 2019 service area and characteristics are shown in Figure 1 and can be found at the following link: <https://platform.remix.com/map/8e183926?latlng=33.11761,-97.08022,10.5&public=true>

The peak headways of routes included in the baseline analysis are provided in Table 1 and Figure 2.

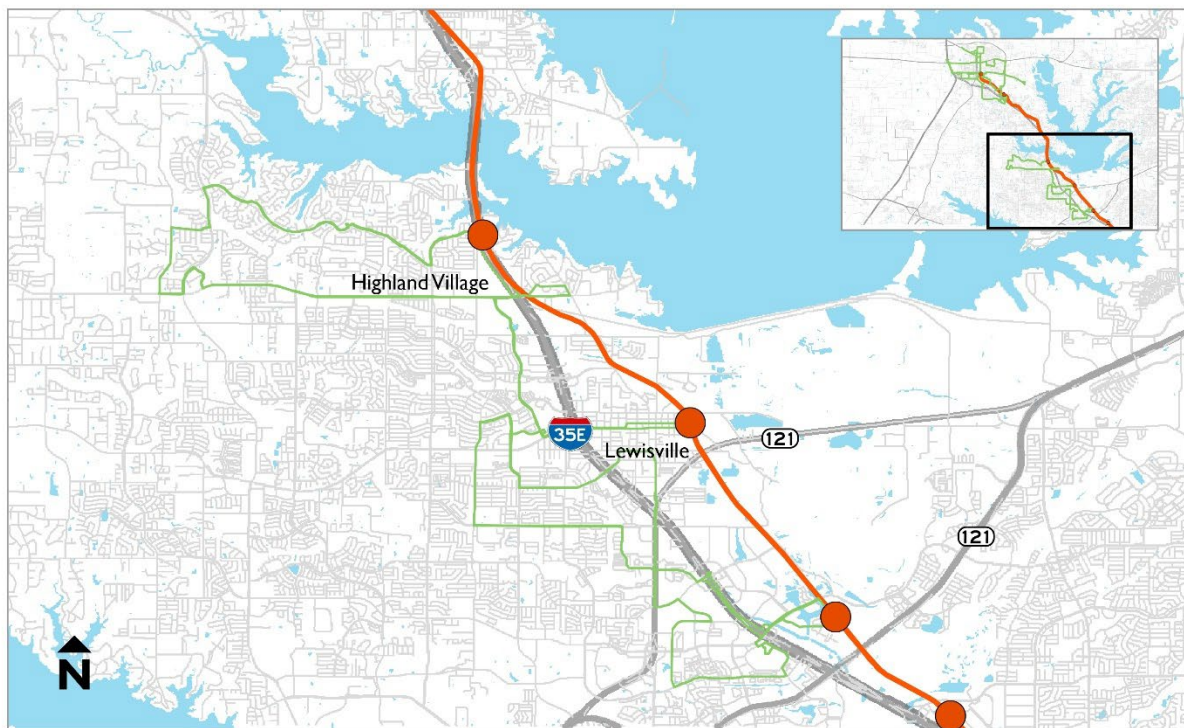
Table 1. Existing Route Headways as of December 2019 (Source: Remix)

Route Name	Peak Headway (mins)
1	44
2	31
3	21
4	30
5	17
6	26
7	30
8	19
21 Lewisville Connect	29
22 Lewisville Connect	30
A-train	29
Highland Village Connect Shuttle	30

Figure 1. Existing DCTA Service (December 2019)

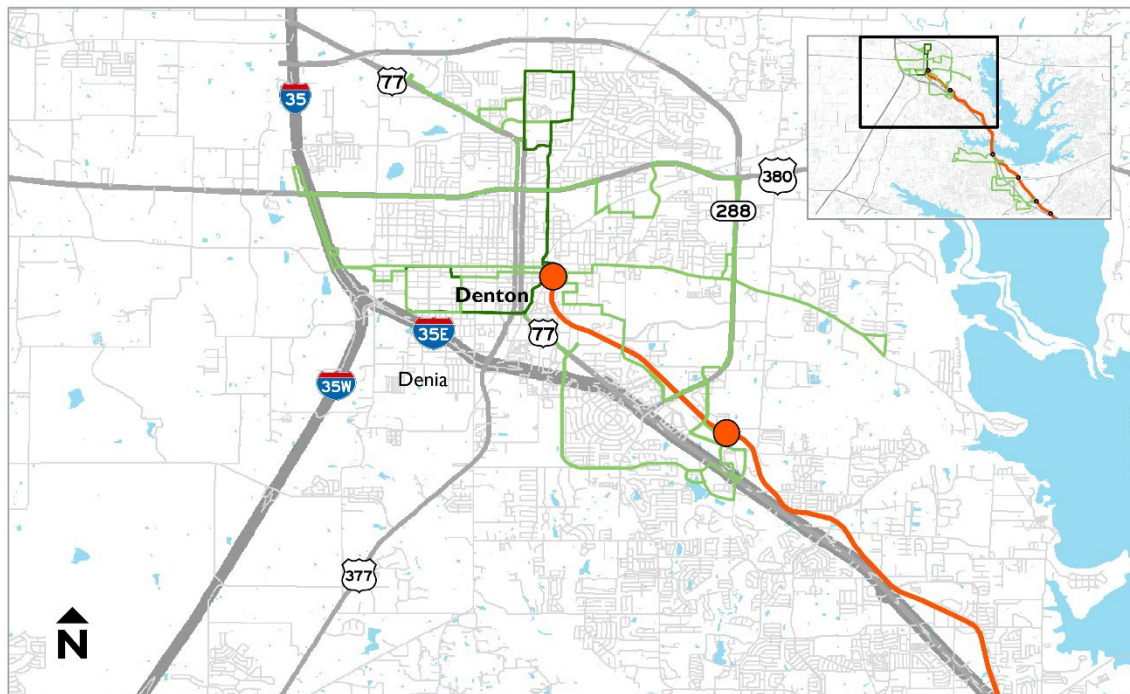


Existing Bus Routes A-Train Roadways Rail Stations

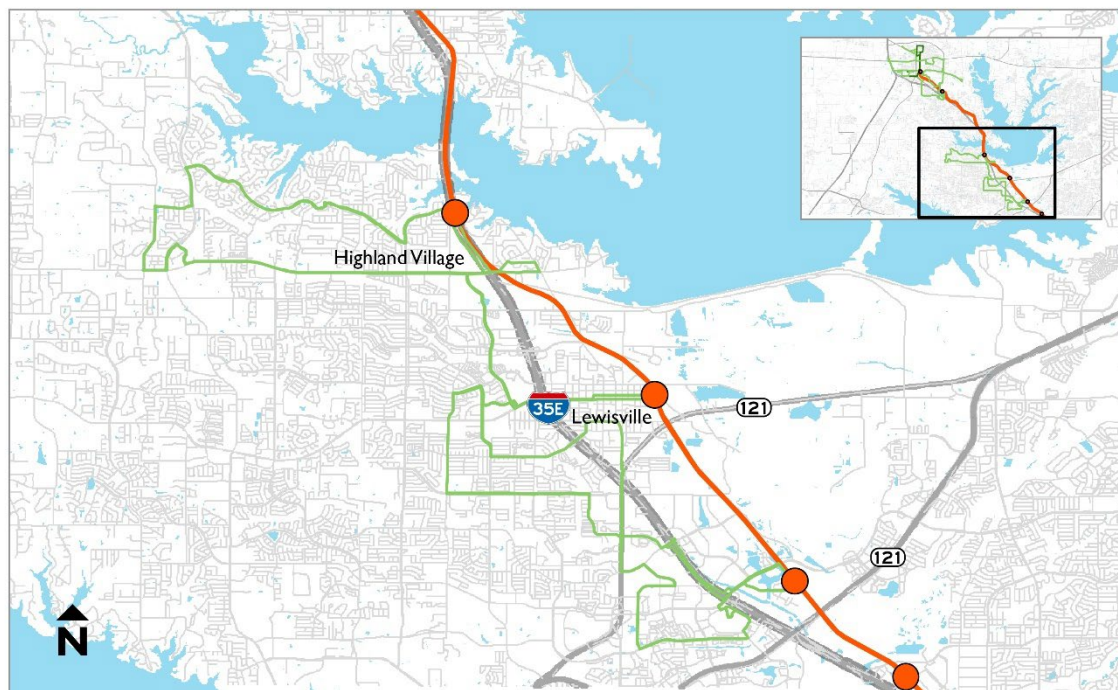


Existing Bus Routes A-Train Roadways Rail Stations

Figure 2. Existing DCTA Service – Peak Headways (December 2019)



- | | |
|---|--|
| — A-Train | Peak Transit Headway (minutes) |
| — Roadways | — 7-20 |
| ● Rail Stations | — 21-94 |



- | | |
|---|--|
| — A-Train | Peak Transit Headway (minutes) |
| — Roadways | — 7-20 |
| ● Rail Stations | — 21-94 |

1.2 SERVICE IMPLEMENTATION PHASES

GoZone service will be implemented in phases, as described on page 147 of the packet for the June 24, 2021 Board of Directors Regular Meeting. This analysis covers Phase I, which is scheduled for implementation in September 2021. Phase II is scheduled for implementation throughout 2022. Phase I fixed-route service, not including GoZones, can be found at the following link:

<https://platform.remix.com/map/14617d69?latlng=33.11761,-97.08022,10.5&public=true>

Phase I fixed-route service and GoZone service areas are shown in Figure 3.

Phase I will have the following service hours upon anticipated launch in September 2021, providing service within the Denton and Lewisville/Highland Village GoZones:

- Monday-Thursday: 5 a.m. – 10 p.m.
- Friday: 5 a.m. – 11 p.m.
- Saturday: 8 a.m. – 8 p.m.

Phase I add-ons provide the following service expansions, if implemented:

- Saturday service hours to 11 p.m.
- Sunday and holiday service: 8 a.m. – 6 p.m. (assumes 10 holidays per year)
- Expand Denton zone to include Denia
- Service within Business 121 North Zone Expansion (with First Park 121)
- Service between the Lewisville/Highland Village GoZone and the Business 121 North Zone Expansion (with First Park 121)
- Service between the Denton and Lewisville/Highland Village zones on Sundays
- Service between the Lewisville/Highland Village GoZone and DART Frankford Station Monday-Thursday 5 a.m. – 10 p.m. and Friday 5 a.m. – 11 p.m.
- "Guaranteed Ride Home" service from the DART Trinity Mills Station to either the Denton Zone or Lewisville/Highland Village Zone for three additional hours after base service ends, Monday-Saturday. These hours of service are not included in the anticipated service hours upon launch in our analysis.
- Sunday A-Train Replacement, 8 a.m. – 6 p.m.

The following bus routes are designated for immediate removal as part of Phase I base service:

- Denton Routes 1, 2, 4, and 6¹
- Highland Village Connect Shuttle
- Lewisville Routes 21 and 22

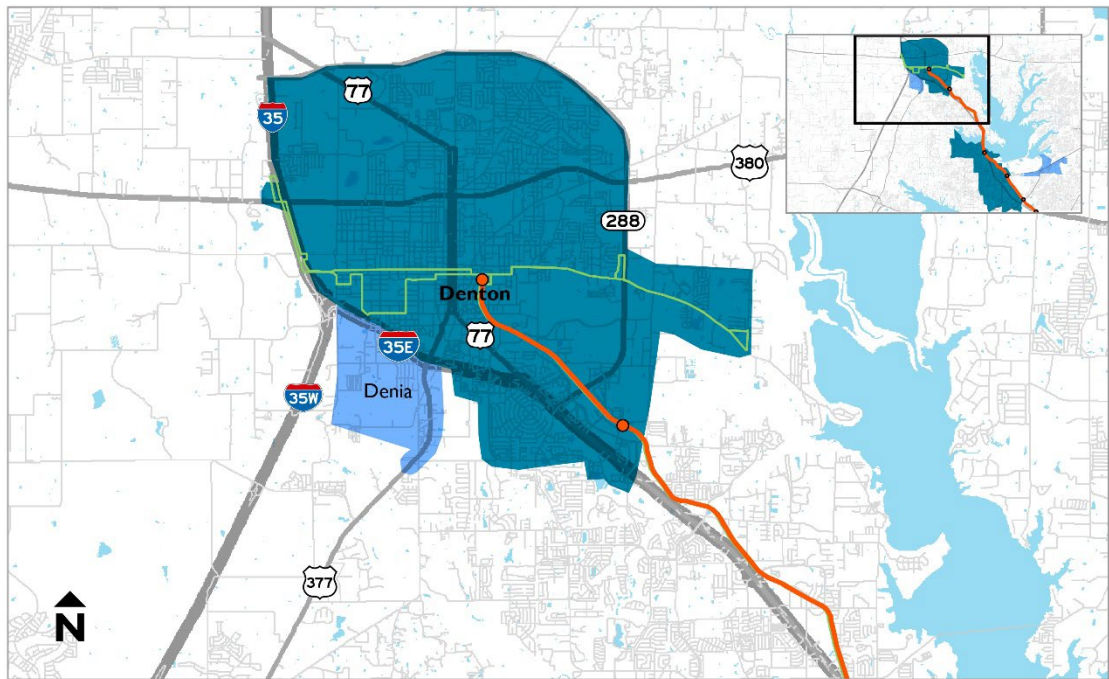
Additionally, Denton Routes 3 and 7 will be monitored for the first six months of GoZone service, with potential consideration for removal. Because a Title VI analysis must be performed no more than six months before implementation of service, a supplemental analysis should be performed before discontinuing Routes 3 and 7 if the service change is expected to last more than 12 months.

The following on-demand zones are also designated for immediate removal as part of Phase I:

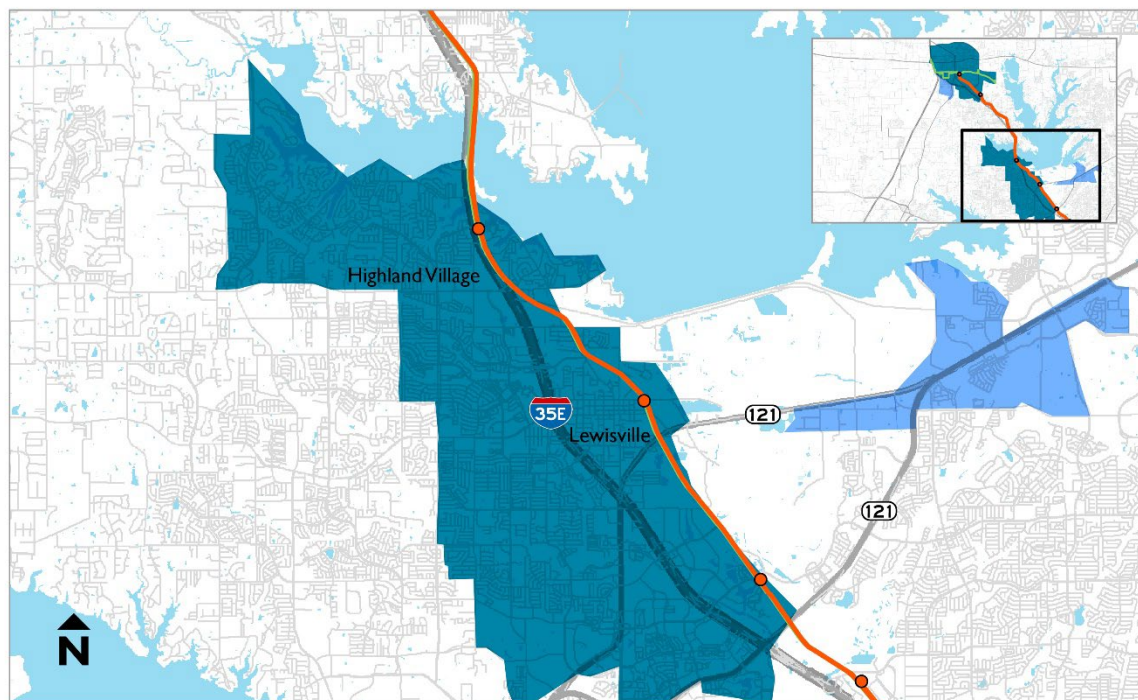
- Lewisville Lakeway Zone
- Highland Village Lyft Zone
- Denton Evening On-Demand Zone
- Lewisville to Flower Mound Lyft Zone

¹ As noted previously, Routes 5 and 8 have not been in operation since pre-COVID; however, as they were removed without a separate Title VI analysis being performed, they are considered part of the initial fixed-route network for this analysis.

Figure 3. Phase I DCTA GoZone Service



- A-Train
- Phase I Bus Routes
- GoZone Base Service Areas
- GoZone Add-On Service Areas
- Roadways
- Rail Stations



- A-Train
- Phase I Bus Routes
- GoZone Base Service Areas
- GoZone Add-On Service Areas
- Roadways
- Rail Stations

2. PEER REVIEW

As the current FTA guidance for Title VI analysis outlined in FTA Circular C 4702.1B, dated 2012, does not specifically cover transitions from fixed-route to on-demand service, the study team conducted a peer review of other agencies that have recently added on-demand service, either as a replacement for existing fixed-route service, a supplement to existing fixed-route service, or as a new service to an area that did not previously have transit service. Table 2 summarizes those agencies that were identified.

Table 2. Peer Agency Discussion Summary

Agency	Location	Change to Service
Green Mountain Transit	Montpelier, VT	Replaced rural fixed-route service with demand-response service.
Maryland Department of Transportation – Maryland Transit Authority	Baltimore, MD	Considered replacing part of a suburban fixed-route service with demand-response service. This pilot project is on hold indefinitely due to COVID-19.
King County Metro	Seattle, WA	Added demand-response service to provide first-/last-mile connections from light rail stations to their surrounding neighborhoods. Did not replace fixed-route service.

Reviews of publicly available documents indicated that none of these agencies was required to perform a Title VI analysis of their service, nor did the study team find an example of an agency converting fixed-route service to demand-responsive service to the degree proposed by DCTA. To confirm this initial assessment and develop a better understanding of how other agencies are approaching on-demand service, the study team followed up with each of the agencies listed above.

These interviews confirmed that none of these agencies were required to perform a Title VI analysis for a demand-response service pilot, and only AC Transit in Oakland chose to perform such an analysis.² Summaries of these interviews were provided to DCTA. The study team also reached out to the Civil Rights Officer for FTA Region 6 and confirmed that no existing guidance has been issued by FTA regarding Title VI analysis of on-demand services.

Similar to DCTA's approach to customer and public engagement, King County Metro found that the best way to reach potential riders of demand-response service is through trusted community-based organizations. These organizations helped the agency identify effective methods for engaging with the groups that they serve, including disadvantaged youth and riders with disabilities. Trusted community partnerships led to an expansion of the service area to an area that was not part of the original service plan, but this expansion is where the program ultimately saw the highest ridership.

Documents provided by peer agencies and interview summaries were provided to DCTA.

3. METHODOLOGY

Having confirmed that there are no existing best practices for Title VI analysis of on-demand services, the team developed the methodology described below, recognizing that this methodology may need to change in the future in response to future guidance from FTA. This methodology is also relying on assumptions provided to the study team regarding the GoZone proposal; these assumptions may need to be revisited once the service is in place and data is available from GoZone operations. This section discusses existing DCTA Title VI Policy, definitions, and the analysis approach.

² Discovered through the interview with MDOT MTA.

3.1 DCTA TITLE VI POLICY

The DCTA Title VI Policy establishes what qualifies as a major service change, what parameters are used to perform a Title VI Analysis, and what potential mitigation strategies or exceptions exist³.

According to DCTA, a major service change is a change that results in one or more of the following conditions:

- i. The establishment or elimination of a fixed bus route.
- ii. A substantial geographical alteration on a given route of more than 25 percent of its revenue miles.
- iii. A modification which causes a change in the number of daily revenue hours provided that is equivalent to a 25 percent or greater increase or decrease of the original daily hours provided.

The Proposed GoZone Network replaces fixed bus routes with demand-response services, and therefore qualifies as a major service change.

DISPARATE IMPACT

DCTA establishes that a fare change, major service change, or other policy has a disparate impact if racial minority populations will experience five (5) percent more of the cumulative burden, or experience five (5) percent less of the cumulative benefit, relative to the non-minority populations. To avoid, minimize, or mitigate disparate impacts, DCTA will develop and assess alternatives and/or modifications to proposed changes that will result in adverse impacts. DCTA will implement alternatives or modifications to proposed changes to address adverse impacts unless:

- i. There is substantial legitimate justification for the change, and
- ii. No other alternatives exist that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.

FARE CHANGE POLICY

A fare equity analysis will be conducted whenever the Authority implements a fare change, regardless of the amount of increase or decrease, except for those changes identified as exceptions in FTA Circular 4702.1B. A fare change is defined as an increase or decrease in fares:

- i. On the entire system,
- ii. On certain transit modes, or
- iii. By fare payment type or fare media.

DISPROPORTIONATE BURDEN

DCTA establishes that a fare change, major service change, or other policy has a disproportionate burden if low-income populations will experience five (5) percent more of the cumulative burden, or experience five (5) percent less of the cumulative benefit, relative to non-low-income populations unless the disproportionate effects are mitigated. Populations are considered low-income if they are at or below 125% of the federal poverty level.

EXISTING THRESHOLDS

DCTA sets a 5% limit on disparate impact on minority and disproportionate burden on low-income populations. In practice, this means that service reductions for minority and low-income populations must

³https://www.dcta.net/sites/default/files/documents/Title%20VI/Title%20VI%20Program%202019_0.pdf

be no more than 5% greater than their respective shares of the population, and furthermore that the proportion of service increases for minority and low-income populations should be at least 5% less than their shares of the population. In Denton County, 41% of the population is a race/ethnicity other than white and/or Hispanic/Latino and 8% of the population has an income at or below 125% of the federal poverty level.⁴ Thus, the service equity analysis must verify that no more than 46% of service reductions (i.e., 5 percentage points greater than 41%) should impact minority residents and that at least 36% of service increases (i.e., 5 percentage points less than 41%) should be accessible to minority residents. The analysis must also verify that no more than 13% of service reductions (i.e., 5 percentage points greater than 8%) should impact low-income residents and that at least 3% of service increases (i.e., 5 percentage points less than 8%) should be accessible to low-income residents.

DCTA does not set thresholds for Limited English Proficiency populations; therefore, impacts to these communities will be assessed quantitatively but with no set thresholds for impact/burden. People who speak English less than “very well” comprise 8% of Denton County’s population.

3.2 DEFINITIONS AND ANALYSIS

To assess service increases and reductions to minority and low-income communities, this analysis uses a “Person-Trips” methodology. Person-Trips are calculated at the 2010 Census Block Group boundaries and ACS 2019 5-Year Counts estimates by multiplying the total number of bus trips that pass through a Census Block Group by the number of people who can access these trips. For fixed-route services, the number of people who can access a bus line is determined by multiplying the population density of the Census Block Group by the total area inside the Block Group that is within ¼ mile of any bus stop on the line. For example, if buses serve a stop 10 times per day, every day of the year (365 days) and there are 10 people living within ¼ mile of that bus stop, this equates to 36,500 annual person-trips (10 x 365 x 10).

Via estimates wait time at 11-to-14-minutes on average and has proposed that additional vehicles will be added to the GoZone fleet as demand increases, maintaining this 11-to-14-minute wait time. For demand-response services, the number of trips is calculated by converting the expected wait time of 11-to-14-minutes to an equivalent fixed-route headway of 12.5 minutes, on average, for all residents of the service area. The number of people who can access the service is determined by multiplying the population density of the Census Block Group by the total area within the demand-response service boundary – in other words, this analysis assumes that all residents have equal access to GoZone trips across the service areas, and that trips will be distributed evenly throughout the service geography. For each relevant population and each relevant service, person-trips are calculated for each service and all Block Groups within the service area, and then summed. Figure 4 shows an example of access, where the yellow highlighted areas are those within ¼ mile of a fixed-route bus stop and the green GoZone are those with access to demand-response service.

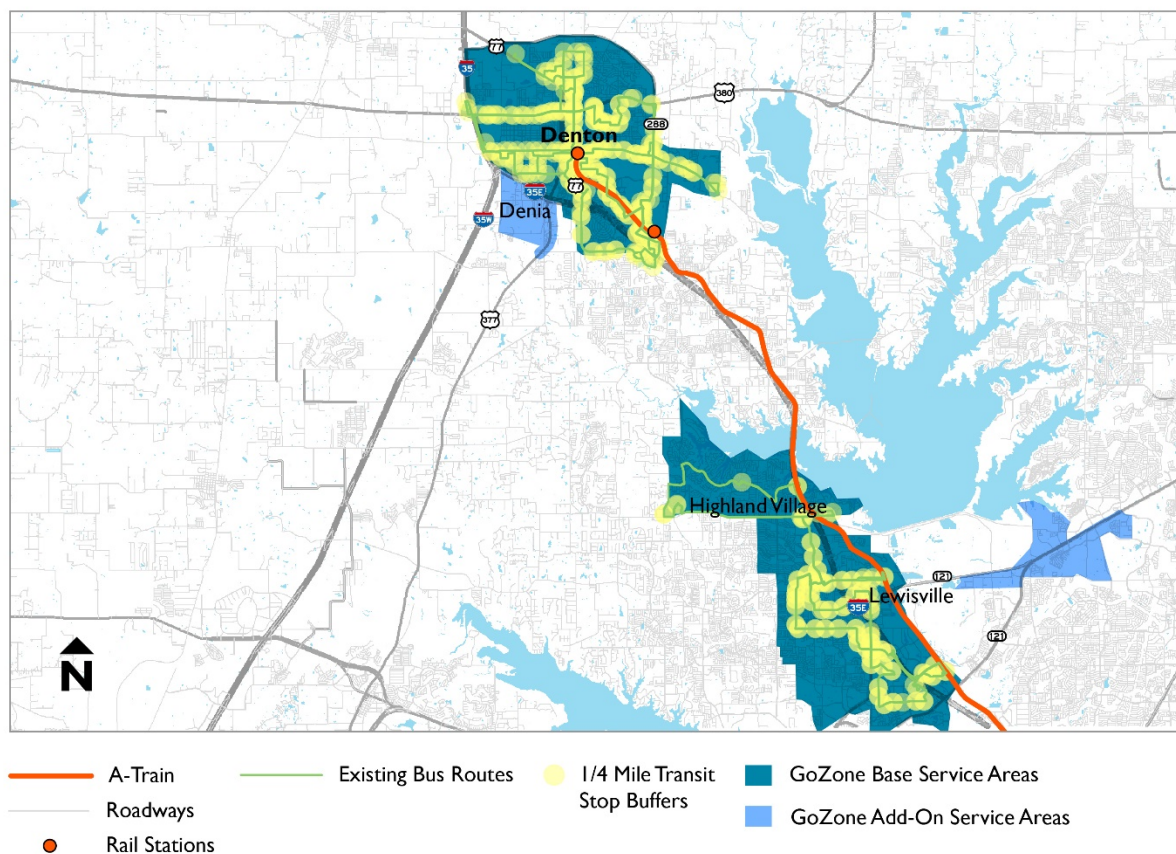
These values are then multiplied by the number of transit trips per year. For fixed-route services, the annual number of vehicle trips is determined by the route schedules. For demand-response services, the annual number of vehicle trips is determined using the Via Simulation Results for Year One, assuming the average number of passengers per vehicle hour, number of vans, and service hours.⁵

See Figure 5 and Figure 6 for a graphical illustration of these calculations.

⁴ American Community Survey, 2019 5-Year Counts

⁵ <https://dctafeedback.net/gozone/home>; Accessed July 8, 2021

Figure 4. Depiction of Access to Transit Service



For example – Via Simulation Results indicate GoZone Base would serve 3.8 rides per vehicle hour on average, or 3.8 “vehicle trips” per hour (only one passenger served at a time). Operating hours are Monday through Thursday, 5 AM to 10 PM, Friday 5 AM to 11 PM and Saturday 8 AM to 8 PM. We assume each year has 51 of each day of the week, per year. This would equate to 4,998 annual operating hours available to each individual. At 3.8 vehicle trips per hour, this is 18,992 trips per year for the GoZones in its first year. With a population of 187,890 among the initial zones, the general population annual person-trips would be 3,568,482,036.

Figure 5. Fixed Route Calculation Methodology and Example

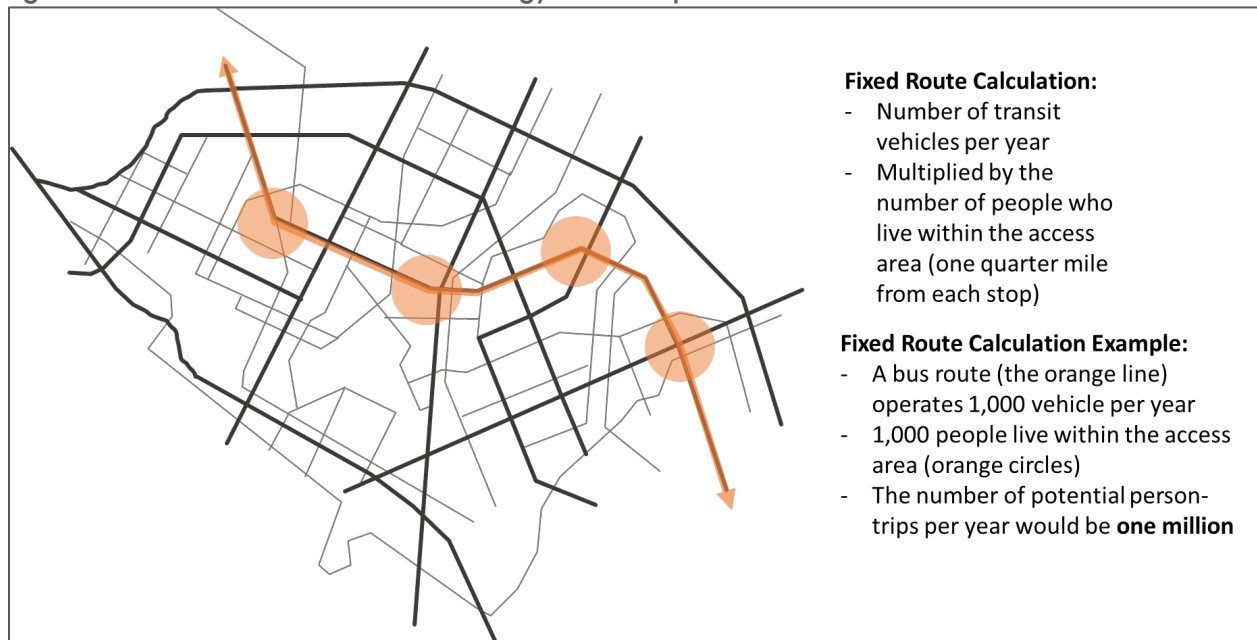
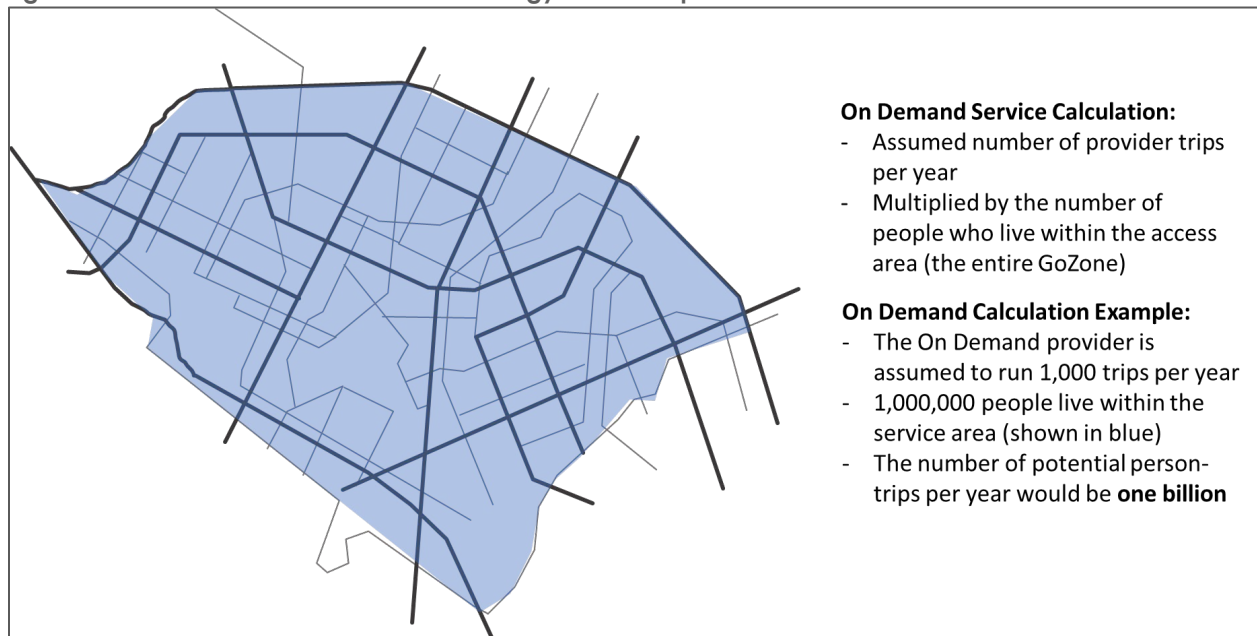


Figure 6. On Demand Calculation Methodology and Example



This analysis calculates person-trips for the following groups under the Existing Network and with the Proposed Network.

- Person-Trips for non-white and/or Hispanic/Latino residents (Minority)
- Person-Trips for residents with incomes below the poverty line (Low-Income)
- Person-Trips for residents with limited English proficiency (LEP)
- Person-Trips for all residents

These values allow for the calculation of the proportion of total service increases or reductions experienced by minority and low-income and then these proportions will be compared to the thresholds identified above to determine compliance.

The analysis was performed in two steps. First, the impacts of removing fixed-route service are evaluated independently. Then the estimated person-trips from GoZone service are estimated and added and the net result is evaluated. This analysis was performed for both the base Phase I GoZone service, as well as a base service with those Phase I add-ons listed in Section 1.2 of this memo.

4. RESULTS

The results of the Title VI analysis excluding the add-on service areas are summarized in Table 3 -- the Limited English Proficiency analysis is summarized in Table 4. Title VI results that include the add-on service areas are summarized in Table 5 -- the Limited English Proficiency analysis with add-ons is summarized in Table 6. The net changes in person-trips are summarized at the Census Block Group-level for GoZone Phase I base service in Figure 7. The net changes in person-trips are summarized at the Census Block Group-level for GoZone Phase I base service with add-ons in Figure 8.

The net change in service with the addition of GoZone is estimated to not have a disparate impact or disproportionate burden, with or without the implementation of add-on service zones.

As discussed above, this analysis assumes the following of GoZone service:

- GoZone is expected to serve an average of 3.8 person-trips per vehicle-hour⁶. For comparison, DCTA's existing bus service provided an average of 17 person-trips per vehicle-hour in 2019.⁷
- Via proposes to maintain 11-to-14-minute wait times by adding vehicles to the fleet during times of peak demand.
- The 11-to-14-minute wait time is the rider-equivalent of a 12.5-minute fixed-route transit service.
- Residents across the GoZone service areas will have equal access to service. Factors that could prevent equal access include, but are not limited to:
 - Disparities in knowledge about how to access GoZone service
 - Disparities based on the ease of use of cash payment and phone call-based reservation systems compared to the use of credit cards and mobile apps, respectively.
 - Unintentional geographic discrimination in the algorithm used to match riders to trips

Figure 9 through Figure 14 depict the existing fixed-route transit system, ¼ mile bus stop buffers, and Title VI populations within Denton and Lewisville. As shown, higher concentrations of Title VI populations live near existing fixed-route service, hence higher impacts to these populations with the removal of fixed-route service. However, implementation of the GoZones can still provide service to these populations, as well as expand service for those not within ¼ mile of bus stops, as in east Denton and south Lewisville.

⁶ <https://dctafeedback.net/gozone/home>; Accessed July 8, 2021

⁷ Federal Transit Administration National Transit Database.

Figure 7. Net Changes in Person-Trips by Census Block Group – GoZone Phase I Base Service

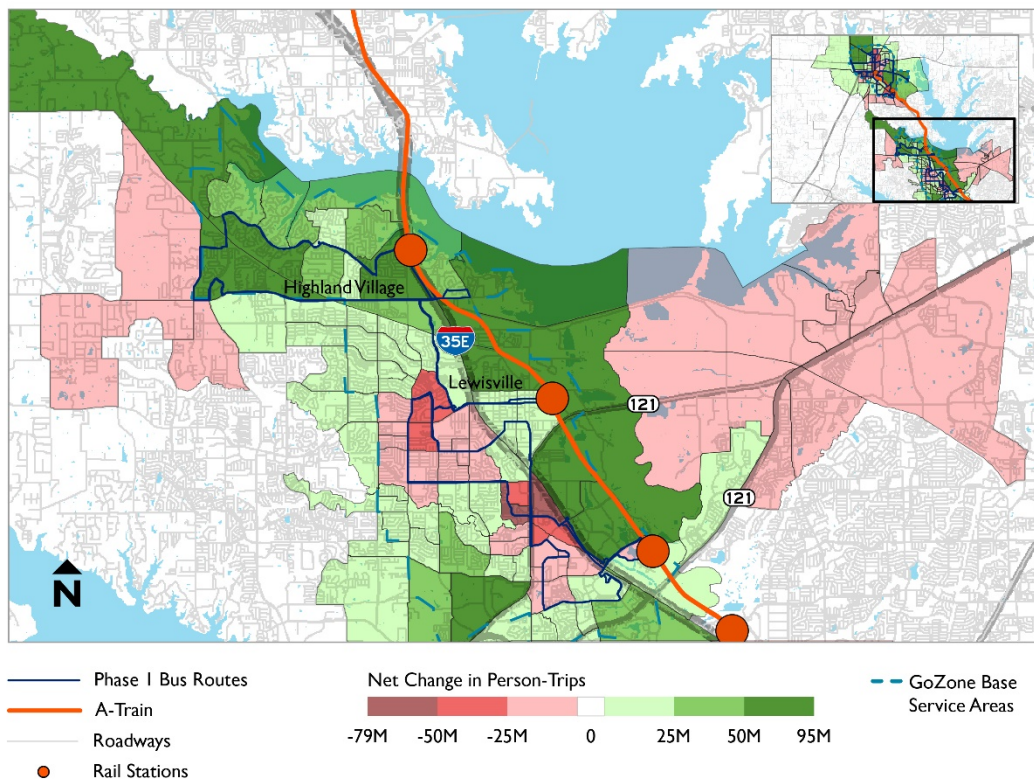
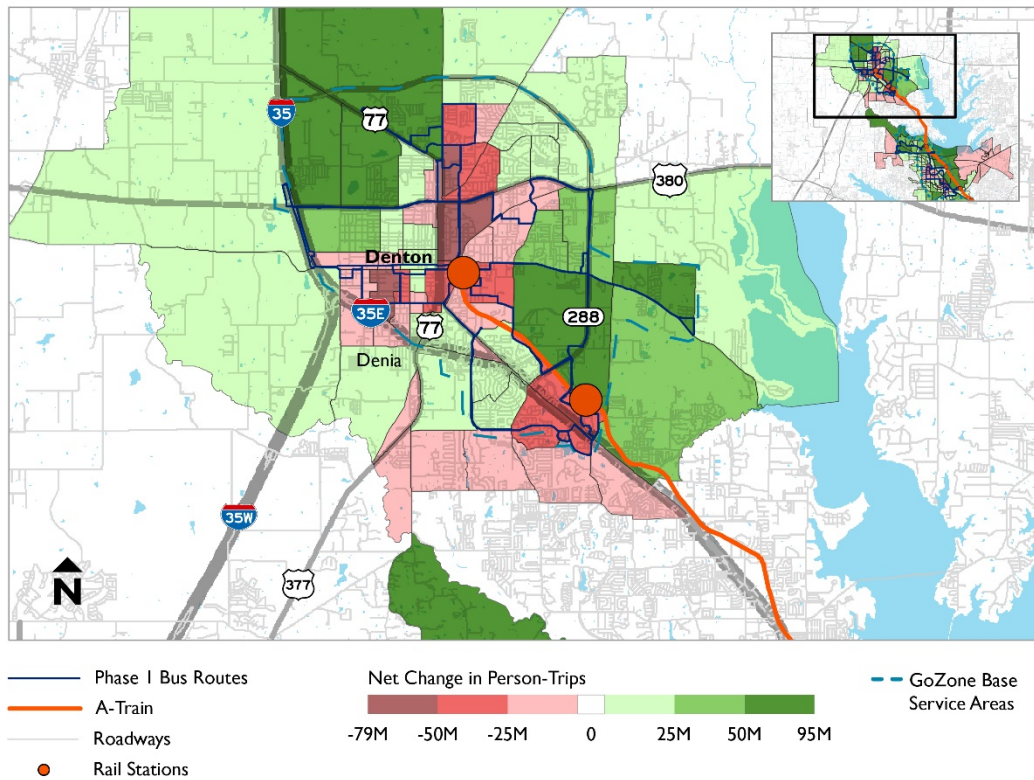


Figure 8. Net Changes in Person-Trips by Census Block Group – GoZone Phase I Base Service with Add-Ons

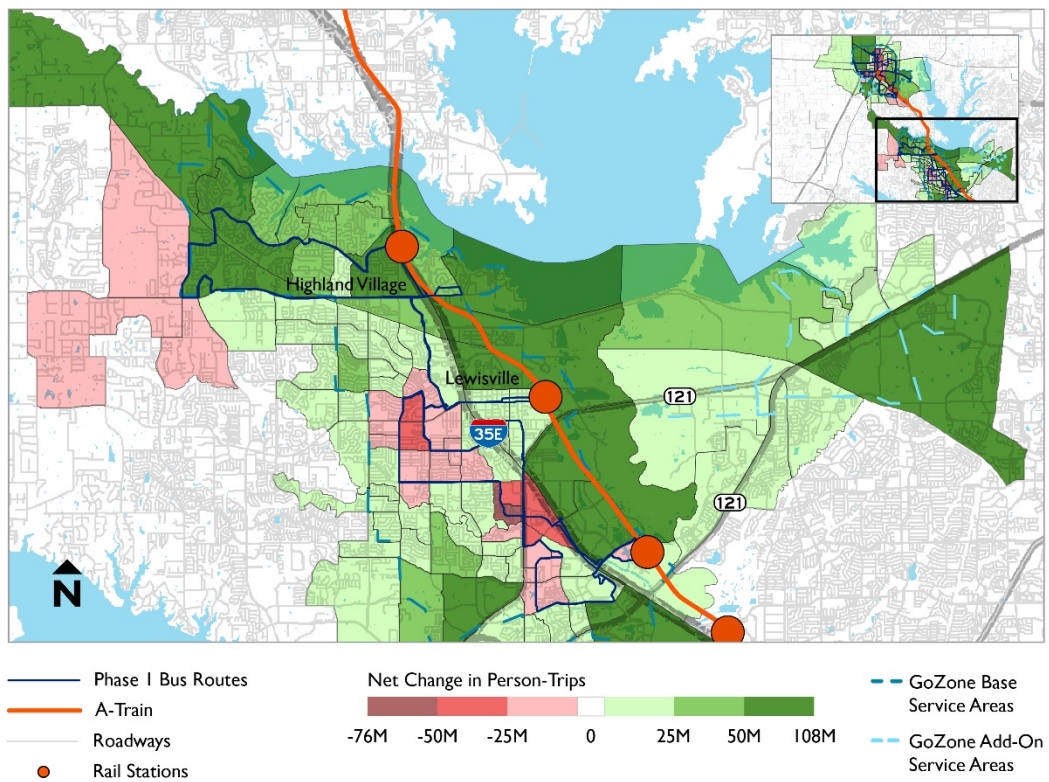
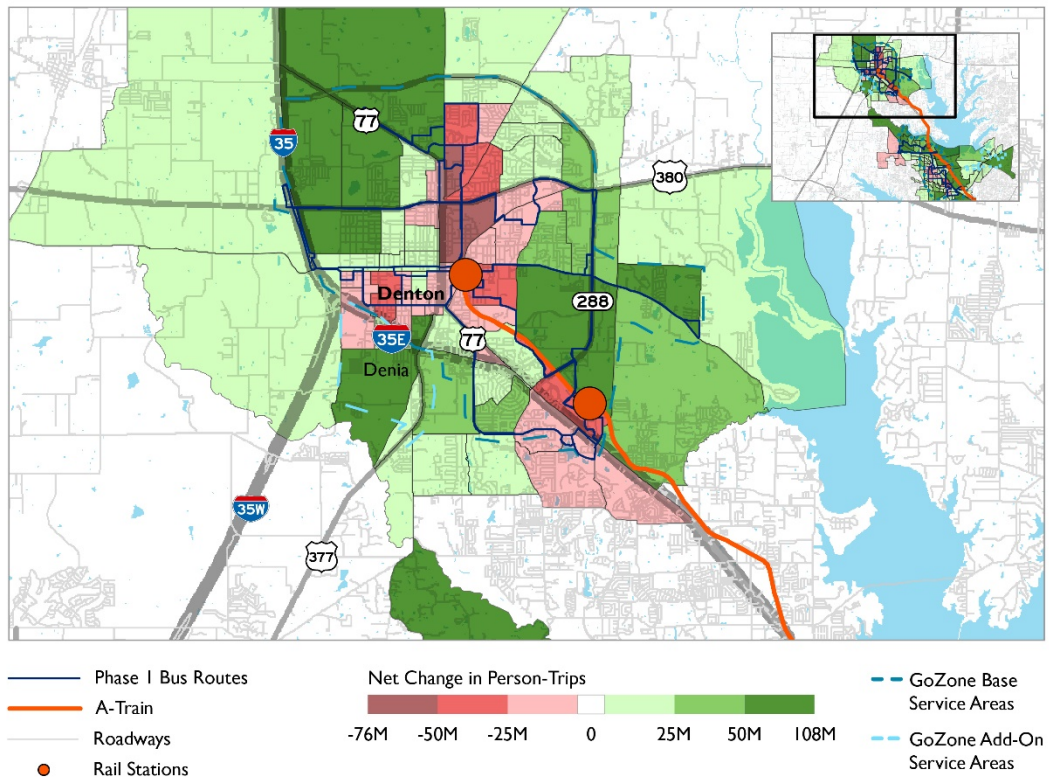


Table 3. Title VI Analysis Results – Phase I Base Service⁸

	Entire Population	Low-Income Population	Minority Population	Low-Income Population Percent Impact	Minority Population Percent Impact	Low-Income Impacts Within Acceptable Range?	Minority Impacts Within Acceptable Range?
Existing Service Annual Person-Trips	1,814,779,200	430,144,600	1,011,819,000	-	-	-	-
Change in Annual Person-Trips with Removal of Fixed-Route Service	-1,524,006,800	-343,503,600	-855,897,500	22.5% (Burden)	56.2% (Burden)	No	No
Annual Person-Trips with Remaining Fixed-Route Service ONLY	290,772,400	86,641,000	155,921,500	-	-	-	-
Estimated GoZone Service Annual Person-Trips	3,553,617,500	587,522,300	1,737,166,500	16.5% (Benefit)	48.9% (Benefit)	-	-
Estimated Annual Person Trips with GoZone and Remaining Fixed-Route Service	3,844,389,900	674,163,300	1,893,088,000	-	-	-	-
Estimated Net Change in Annual Person-Trips	2,029,610,700	244,018,700	881,269,000	12.0% (Benefit)	43.4% (Benefit)	Yes	Yes

Table 4. Limited English Proficiency (LEP) Analysis Results – Phase I Base Service⁹

	Entire Population	LEP Population	LEP Population Percent Impact
Existing Service Annual Person-Trips	1,814,779,200	231,065,300	-
Change in Annual Person-Trips with Removal of Fixed-Route Service	-1,524,006,800	-200,881,900	13.2% (Burden)
Annual Person-Trips with Remaining Fixed-Route Service ONLY	290,772,400	30,183,400	-
Estimated GoZone Service Annual Person-Trips	3,553,617,500	346,264,500	9.7% (Benefit)
Estimated Annual Person Trips with GoZone and Remaining Fixed-Route Service	3,844,389,900	376,447,900	-
Estimated Net Change in Annual Person-Trips	2,029,610,700	145,382,600	7.2% (Benefit)

⁸ Person-Trips are rounded to the nearest 100

⁹ Person-Trips are rounded to the nearest 100

Table 5. Title VI Analysis Results – Phase I Base + Add-On Service¹⁰

	Entire Population	Low-Income Population	Minority Population	Low-Income Population Percent Impact	Minority Population Percent Impact	Low-Income Impacts Within Acceptable Range?	Minority Impacts Within Acceptable Range?
Existing Service Annual Person-Trips	1,814,779,200	430,144,600	1,011,819,000	-	-	-	-
Change in Annual Person-Trips with Removal of Fixed-Route Service	-1,524,006,800	-343,503,600	-855,897,500	22.5% (Burden)	56.2% (Burden)	No	No
Annual Person-Trips with Remaining Fixed-Route Service ONLY	290,772,400	86,641,000	155,921,500	-	-	-	-
Estimated GoZone Service Annual Person-Trips	4,311,087,700	710,081,400	2,130,201,400	16.5% (Benefit)	49.4% (Benefit)	-	-
Estimated Annual Person Trips with GoZone and Remaining Fixed-Route Service	4,601,860,100	796,722,400	2,286,122,900	-	-	-	-
Estimated Net Change in Annual Person-Trips	2,787,080,900	366,577,800	1,274,303,900	13.2% (Benefit)	45.7% (Benefit)	Yes	Yes

Table 6. Limited English Proficiency (LEP) Analysis Results – Phase I Base + Add-On Service¹¹

	Entire Population	LEP Population	LEP Population Percent Impact
Existing Service Annual Person-Trips	1,814,779,200	231,065,300	-
Change in Annual Person-Trips with Removal of Fixed-Route Service	-1,524,006,800	-200,881,900	13.2% (Burden)
Annual Person-Trips with Remaining Fixed-Route Service ONLY	290,772,400	30,183,400	-
Estimated GoZone Service Annual Person-Trips	4,311,087,700	413,105,600	9.6% (Benefit)
Estimated Annual Person Trips with GoZone and Remaining Fixed-Route Service	4,601,860,100	443,289,000	-
Estimated Net Change in Annual Person-Trips	2,787,080,900	212,223,700	7.6% (Benefit)

¹⁰ Person-Trips are rounded to the nearest 100

¹¹ Person-Trips are rounded to the nearest 100

5. RECOMMENDATIONS

The study team developed its analysis based on projected levels of ridership and service outlined in the GoZone proposal. Once data from the initial Phase I deployment is available, it would be appropriate to revisit this analysis and use observed data regarding ridership, virtual stop locations, and hours of revenue service to determine whether the methodology used in this study should be further refined.

In a Title VI analysis for fixed-route transit, the proposed changes represent a commitment from an agency to provide prescribed service. Should the actual service implemented deviate from the assumptions outlined above, it is possible that there may be additional negative impacts to low-income, minority, and/or LEP communities. It is strongly recommended that the assumptions above be confirmed in finalizing the details of the GoZone implementation, and that operations be monitored to ensure consistency with the findings in this analysis. DCTA should also consider requiring any contractors providing on-demand services to provide reporting on trips by Census Block Group to ensure equitable service and compliance with Title VI. Data should be verified by a third party wherever possible. Finally, DCTA should seek demographic information of riders to ensure that service is as equitable as predicted. This should be done through voluntary intercept surveys. Regular surveys are already done as part of DCTA's routine efforts toward improvement.

GoZone service will have a promotional fare for the first six months of service. The long-term fare policy for GoZone service has not yet been finalized. A final fare policy will be presented to the DCTA board in March 2022. The fare policy will require separate analysis for Title VI compliance.

As FTA has yet to establish guidelines for performing Title VI analyses on on-demand services, it would be appropriate to share this initial analysis with FTA for their feedback.

Figure 9. Populations with Low-Income in Denton

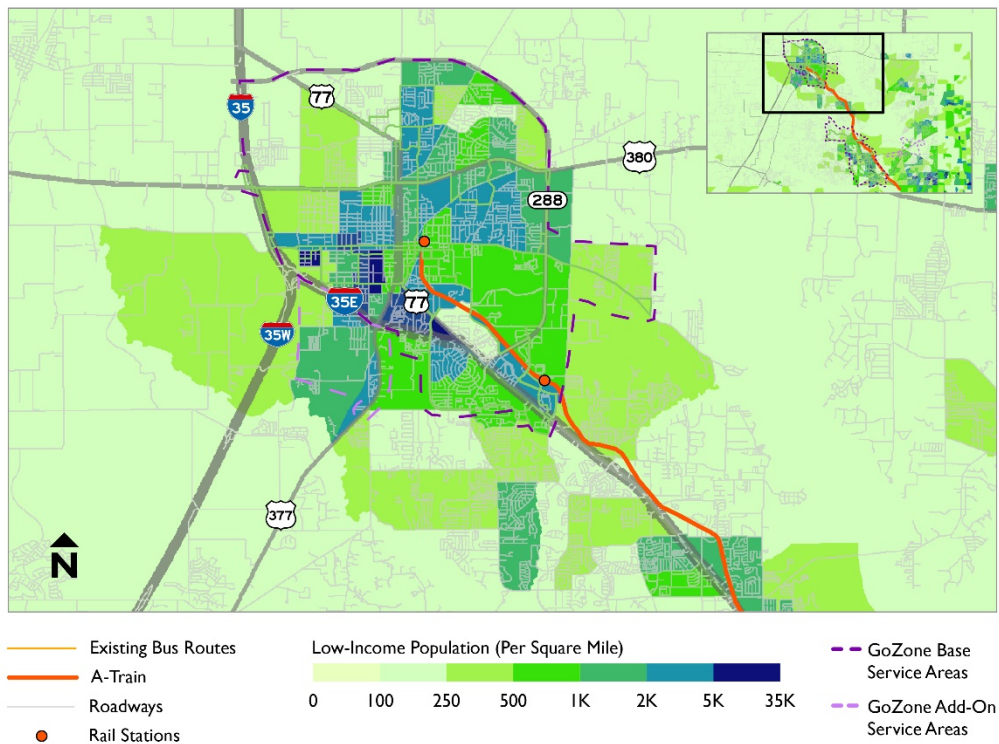


Figure 10. Minority Populations in Denton

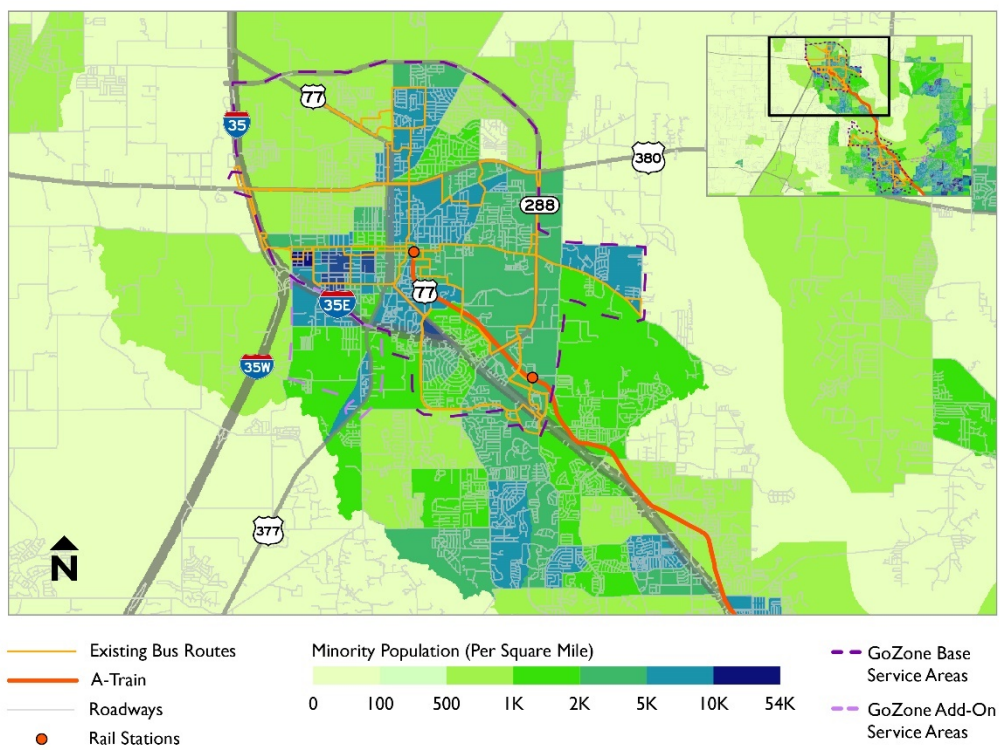


Figure 11. Populations with Limited English Proficiency in Denton

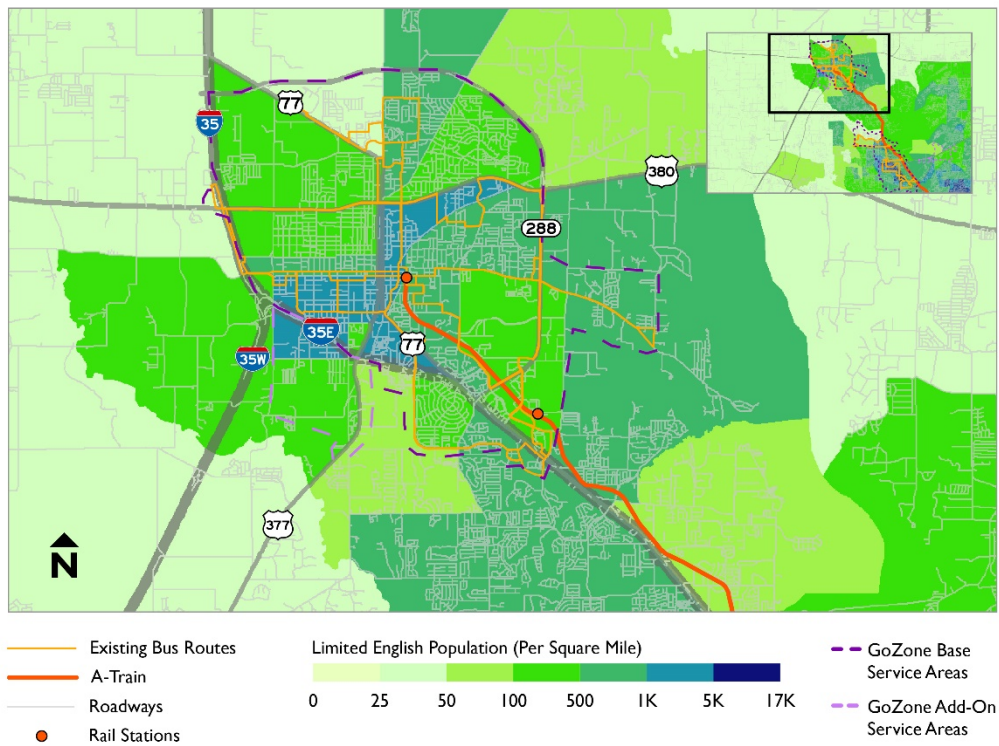


Figure 12. Populations with Low-Income in Lewisville

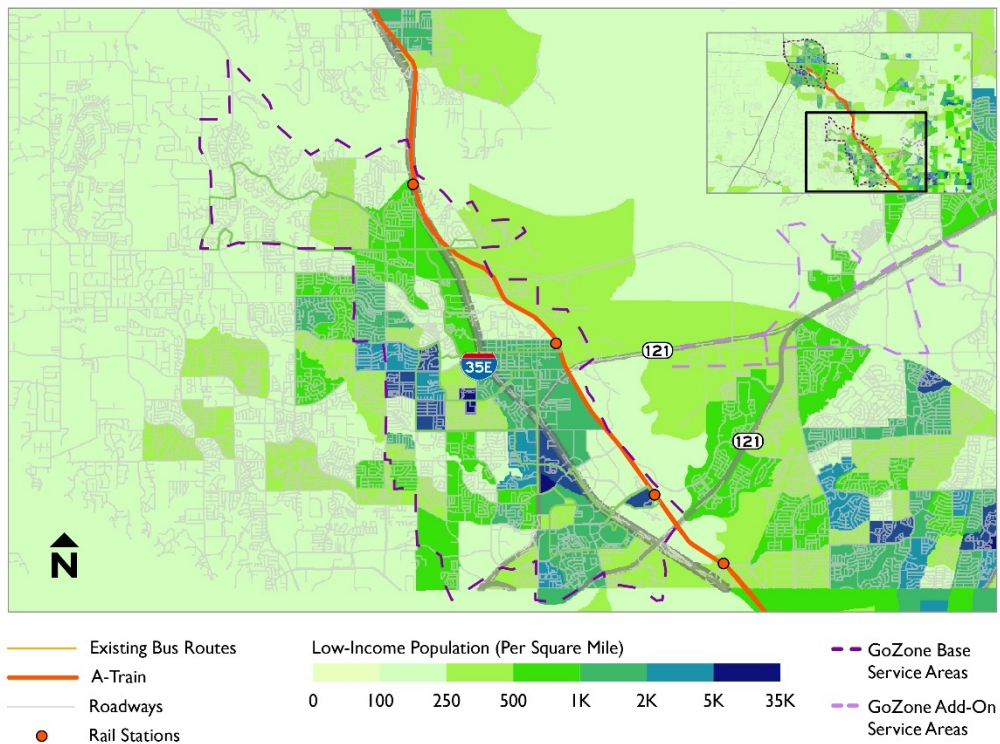


Figure 13. Minority Populations in Lewisville

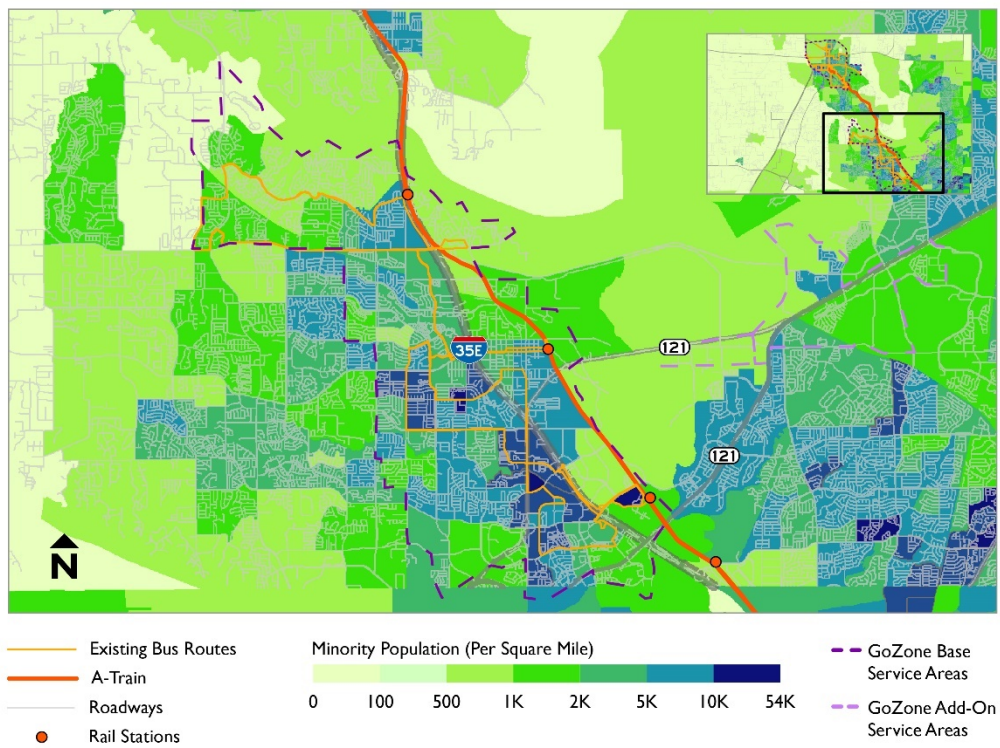
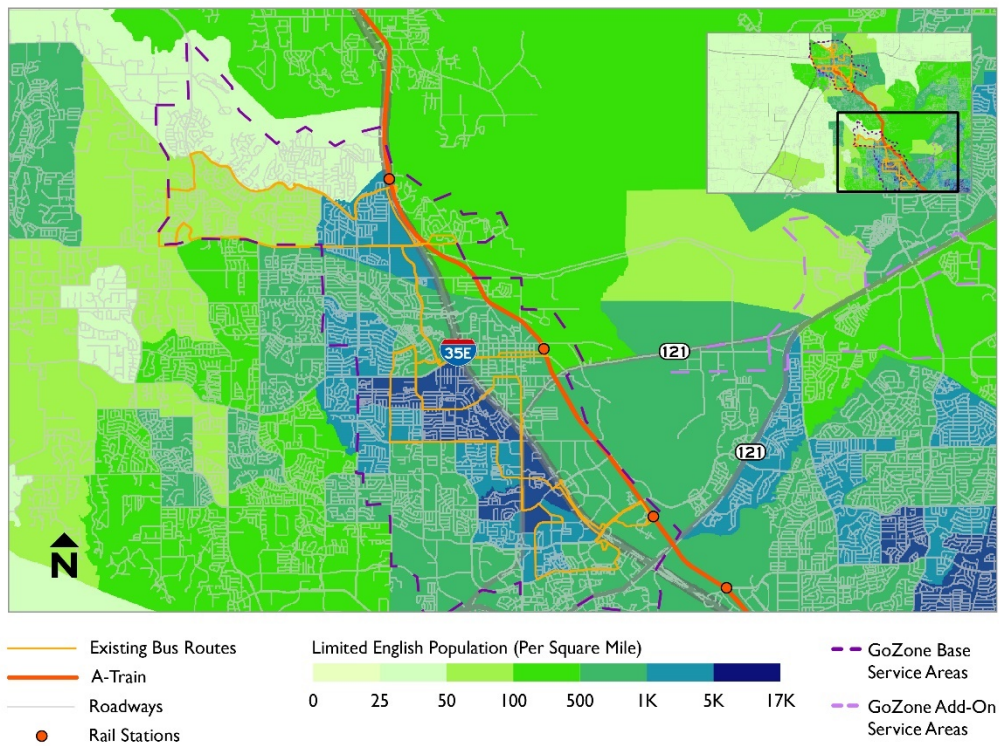


Figure 14. Populations with Limited English Proficiency in Lewisville



Fall 2020 Service Changes



ONLINE OPEN HOUSE MEETING

Presentation and Video Online: June 15 – June 26, 2020
Available at RideDCTA.net

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DCTA'S COVID-19 RESPONSE



DCTA'S COVID-19 RESPONSE

- DCTA is closely monitoring what is happening with the [novel coronavirus \(COVID-19\)](#)
- At DCTA, our top priorities are keeping our passengers and employees healthy and ensure a safe commute for our riders
- DCTA has continued to operate as an essential business during COVID-19
- Due to the current COVID-19 risks, DCTA has increased precautions to protect our passengers and staff and have dedicated a webpage to communicate actions and updates with riders
- Information on the dedicated webpage includes, but is not limited to:
 - Efforts to keep passengers and staff safe
 - DCTA service updates related to COVID-19
 - Appreciation video dedicated to frontline workers
 - COVID-19 facts and resources
 - How to protect yourself and prevent the spread of illness
 - Downloadable resources
 - FAQs
- To view DCTA's dedicated webpage, visit <https://www.dcta.net/media-center/news/2020/denton-county-transportation-authority-coronavirus-covid-19-update>

PROPOSED SERVICE CHANGE MODIFICATION OVERVIEW



PROPOSED SERVICE CHANGE MODIFICATION OVERVIEW



- Due to COVID-19, stay-at-home orders and state-wide disaster declarations, DCTA experienced ridership declines across the system.
- Due to existing ridership declines and the impacts of projected ridership growth as businesses reopen, DCTA is proposing system-wide service modifications.
- On March 23, 2020, DCTA implemented temporary system-wide service modifications due to the impacts of COVID-19
- On May 11, 2020, DCTA implemented additional temporary system-wide service modifications due to the continued impacts of COVID-19
- On August 24, 2020, DCTA is proposing the permanent adoption of the system-wide service modifications made in March and May

PROPOSED CONNECT BUS SERVICE MODIFICATIONS



PROPOSED CONNECT BUS SERVICE MODIFICATIONS

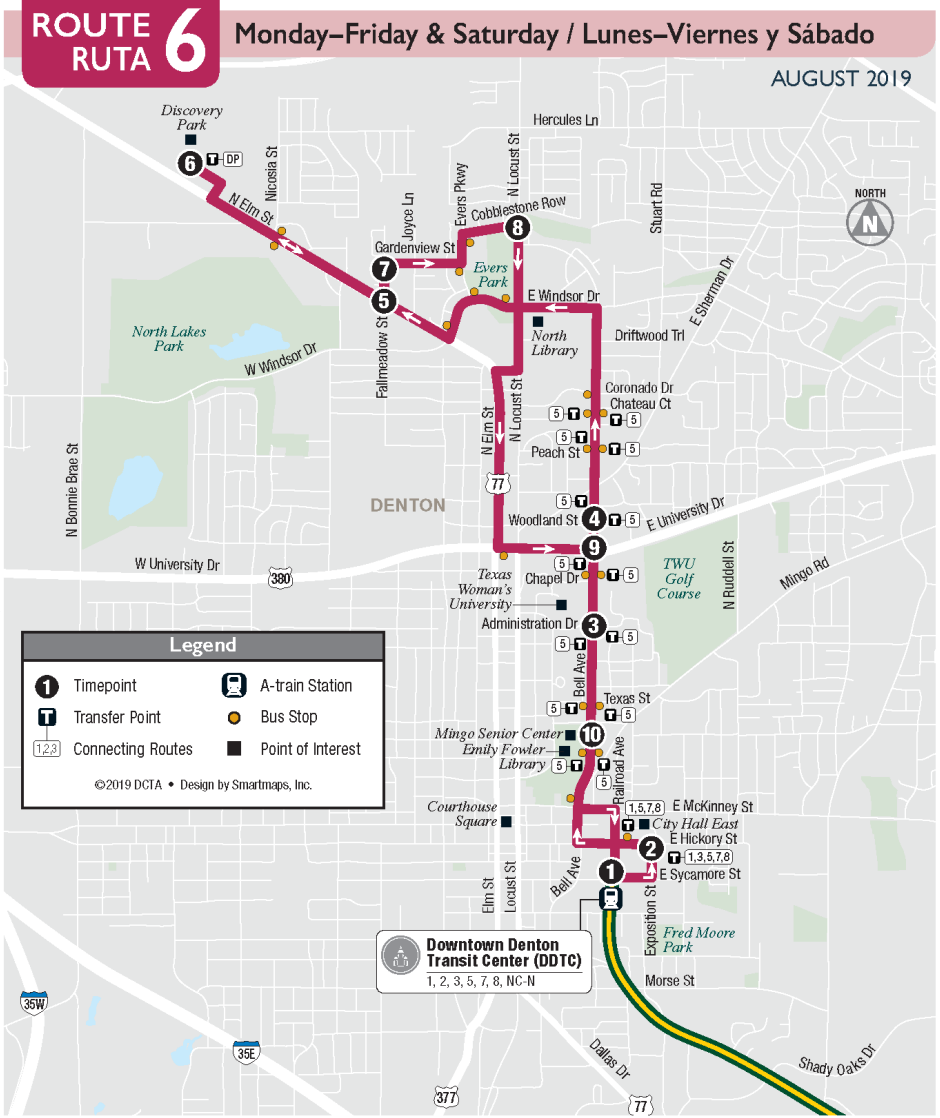
The table below showcases the individual Connect service modifications that were made in both March and April, as well as the proposed modifications slated for August

Service	March 23 Changes	May 11 Changes	August 24 Changes
Route 1	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Continued	Continued
Route 2	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Continued	Continued
Route 3	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Continued	Continued
Route 4	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Continued	Continued
Route 5	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Suspended Service	Removal of Route
Route 6	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Continued	Continued
Route 7	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Continued	Continued
Route 8	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Suspended Service	Removal of Route
Route 21	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Continued	Continued
Route 22	<ul style="list-style-type: none"> • Saturday schedule with 60-minute frequency • Additional morning run 	Continued	Continued
Highland Village Connect Shuttle	<ul style="list-style-type: none"> • Discontinued of service 	N/A	N/A

PROPOSED CONNECT BUS SERVICE MODIFICATIONS



Passengers who previously utilized Denton Connect Route 5 can utilize Denton Connect Route 6 to get to the majority of destinations.



PROPOSED CONNECT BUS SERVICE MODIFICATIONS



Passengers who previously utilized Denton Connect Route 8 can ride Denton Connect Route 7 to get to the majority of their destinations.



PROPOSED A-TRAIN SERVICE MODIFICATIONS



PROPOSED A-TRAIN SERVICE MODIFICATIONS

- A-train service will be provided hourly Monday through Friday from 6 a.m. to 9 p.m.
- Saturday service will remain the same



PROPOSED ON-DEMAND SERVICE MODIFICATIONS



PROPOSED ON-DEMAND SERVICE MODIFICATIONS

- Due to Connect bus service modifications, Connect bus service ends prior to A-train service
- To address last-mile connections during that time, DCTA implemented an on-demand service from four A-train stations
- On May 11, 2020, DCTA maintained the on-demand service at both the Hebron Station and the DDTC Station due to prior ridership trends
- On August 24, 2020, DCTA is recommending maintaining the on-demand service at the DDTC Station and utilizing the existing Lewisville Lakeway on-demand service for trips out of the Hebron Station

March 23 Changes	May 11 Changes	August 24 Changes
Hebron Station	Continued	Discontinued (Lewisville Lakeway Zone meets the needs)
Old Town Station	Discontinued	N/A
MedPark Station	Discontinued	N/A
DDTC Station	Continued	Made Permanent

NOTE: On-demand service was never added to the Highland Village/Lewisville Lake Station due to existing service through the Highland Village Lyft Program that met the last-mile needs of riders

PROPOSED UNT SERVICE MODIFICATIONS



PROPOSED UNT SERVICE MODIFICATIONS – FALL/SPRING ROUTES



- **{NEW} Parking Express (PE)** →

- Will operate two (2) buses from 7:30 a.m. until 3:15 p.m. each scheduled weekday
- Frequency of 20 minutes



- **Mean Green (MG)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 20 minutes



- **North Texan (NT)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- This route will also include one (1) morning peak vehicle that will provide additional service from 7 a.m. until 11 a.m., Monday through Friday on scheduled days
- Frequency
 - 11 minutes from 7 a.m. until 11 a.m.
 - 21 minutes from 11 a.m. until 5 p.m.



PROPOSED UNT SERVICE MODIFICATIONS – FALL/SPRING ROUTES



- **Eagle Point (EP)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 30 minutes



- **Colorado Express (CE)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- This route will also include one (1) morning peak vehicle that will provide additional service from 7 a.m. until 11 a.m., Monday through Thursday on scheduled days



- **Centre Place (CP)**

- Will operate four (4) buses from 7 a.m. until 5 p.m. each scheduled weekday
- This route will also include
 - Extended evening service that will operate one (1) bus until 9 p.m., Monday through Thursday on scheduled days
- Frequency
 - 28 minutes from 7 a.m. until 11 a.m.
 - 55 minutes from 11 a.m. until 5 p.m.

PROPOSED UNT SERVICE MODIFICATIONS – FALL/SPRING ROUTES



- **Discovery Park (DP)**

- Will operate three (3) buses from 7 a.m. until 5 p.m. each scheduled weekday
- This route will also include
 - {NEW} One (1) mid-day peak vehicle that will provide additional service from 9 a.m. until 3 p.m., Monday through Friday on scheduled days
 - Extended evening service that will operate one (1) bus until 9 p.m., Monday thru Friday on scheduled days
- Frequency
 - 12 minutes from 7 a.m. until 9 a.m.
 - 9 minutes from 9 a.m. until 3 p.m.
 - 12 minutes from 3 p.m. until 5 p.m.



- **Bernard Street (BST)**

- Will operate two (2) buses from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 10 minutes

PROPOSED UNT SERVICE MODIFICATIONS – FALL/SPRING ROUTES



- **Mean Green Night Rider (MGNR)**

- Will operate one (1) bus from 6 p.m. until 10 p.m. each scheduled weekday
- Frequency of 30 minutes



- **Mean Green Night Rider Late-Night (MGNR-LN)**

- Will operate one (1) bus from 10 p.m. until 2 a.m. each scheduled weekday
- Frequency of 30 minutes



PROPOSED UNT SERVICE MODIFICATIONS – SUMMER ROUTES



- **Mean Green (MG)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 20 minutes



- **North Texan (NT)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 21 minutes



- **Eagle Point (EP)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 30 minutes



- **Colorado Express (CE)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 55 minutes

PROPOSED UNT SERVICE MODIFICATIONS – SUMMER ROUTES



- **Centre Place (CP)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 27 minutes



- **Discovery Park (DP)**

- Will operate one (1) bus from 7 a.m. until 7 p.m. each scheduled weekday
- Frequency of 35 minutes



- **Bernard Street (BST)**

- Will operate one (1) bus from 7 a.m. until 5 p.m. each scheduled weekday
- Frequency of 20 minutes



- **Mean Green Night Rider (MGNR)**

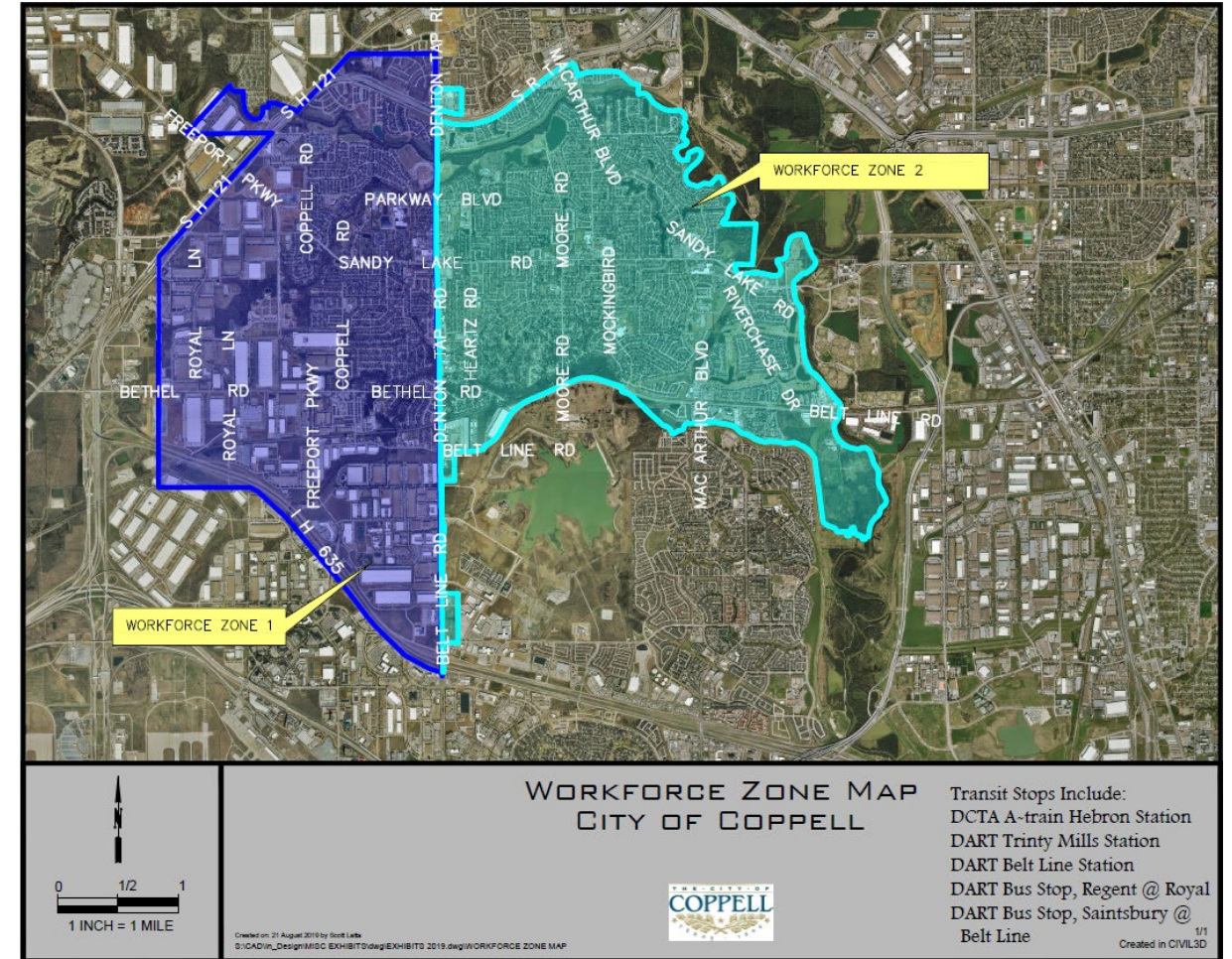
- Will operate one (1) bus from 5 p.m. until 9 p.m. each scheduled weekday
- Frequency of 30 minutes

CITY OF COPPELL LYFT PROGRAM CONTINUATION

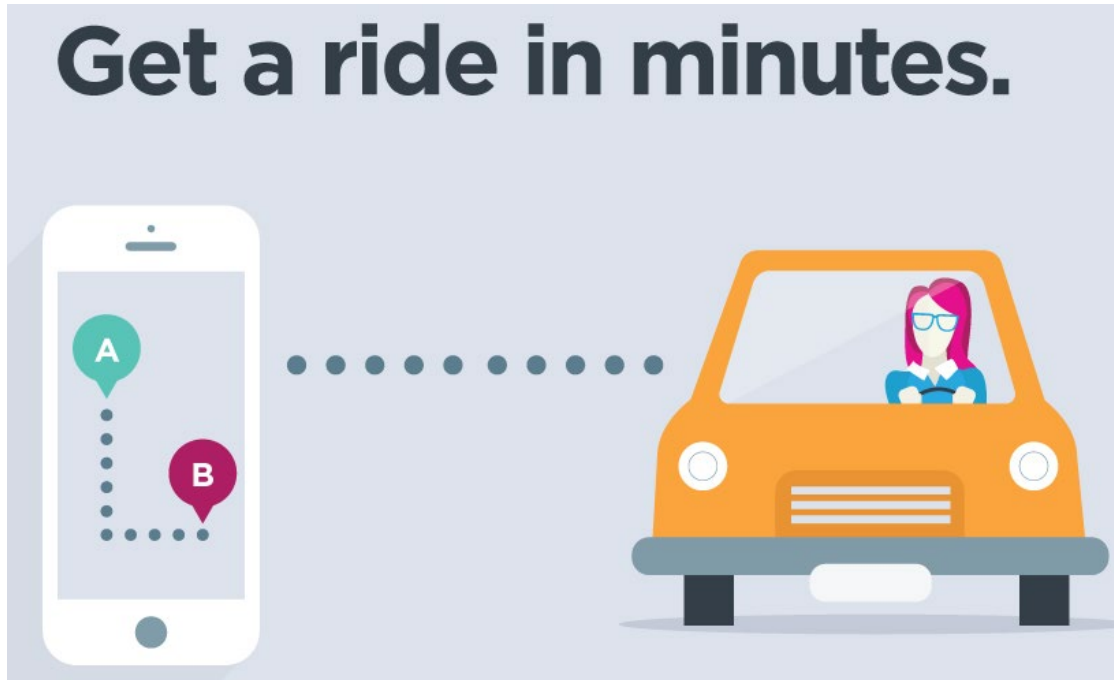


CITY OF COPPELL LYFT PROGRAM CONTINUATION

- DCTA and the City of Coppell partnered to provide workforce transportation to Coppell's west side business park, which includes large distribution facilities, and an east side zone
- The program began on October 1, 2019 as a 12-month pilot, scheduled to end September 30, 2020
- DCTA and the City of Coppell are in discussion to continue the Lyft Program for another 12 months, beginning October 1, 2020
- DCTA's agreement with Lyft provides first/last mile connections between area transit stops and the east and west side zones within the City of Coppell



CITY OF COPPELL LYFT PROGRAM CONTINUATION



- Services are available from 4 a.m. – 12 a.m., Monday - Sunday
- The customer pays the first \$2 and the City of Coppell pays the next \$12 for a total trip cost of \$17
- Anything over \$17 is the customer's responsibility
- The average Lyft trip using this program is \$12

TITLE VI ANALYSIS (FIXED ROUTE ONLY)



TITLE VI ANALYSIS - OVERVIEW

What is Title VI?

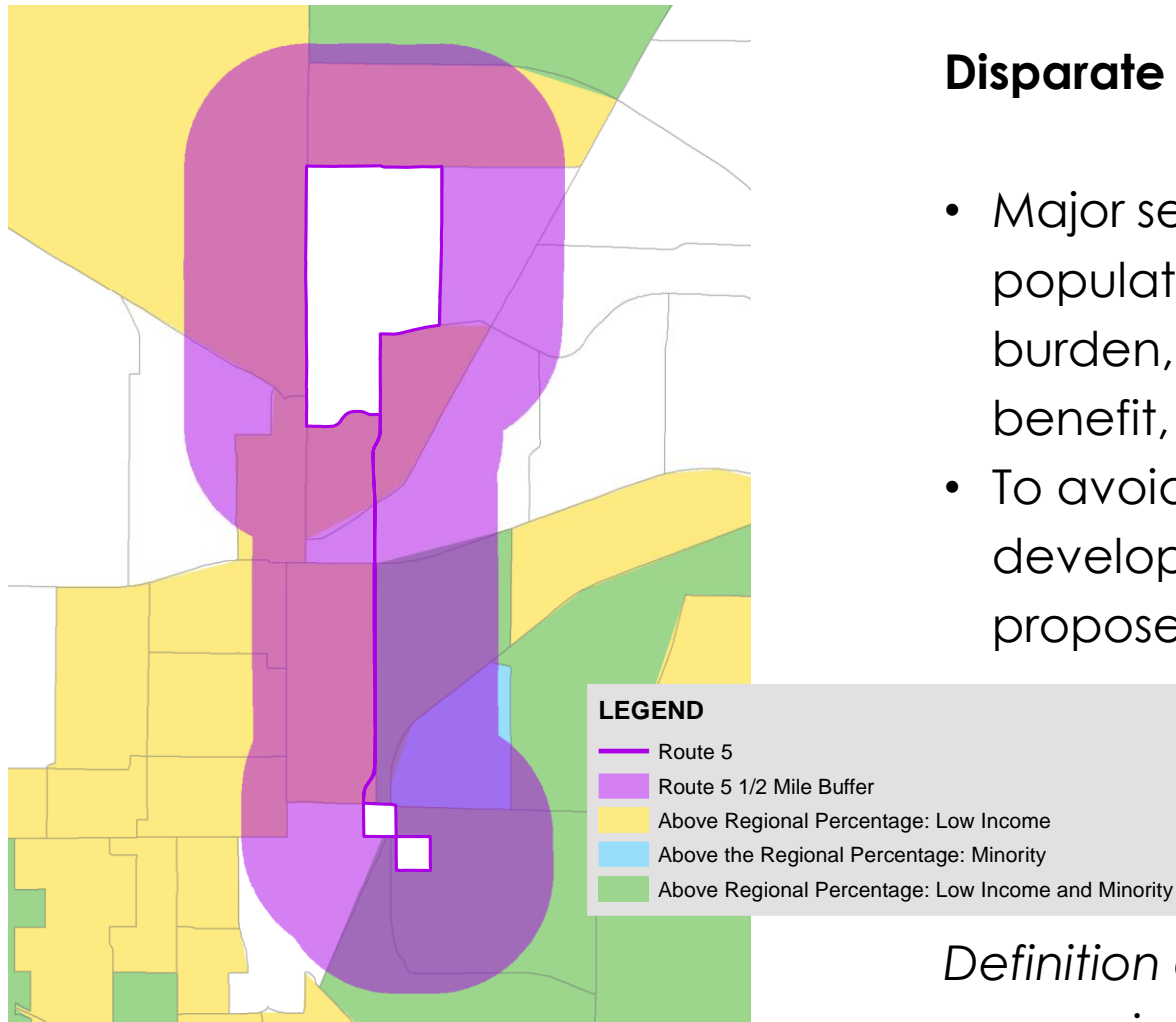
Title VI is part of the Civil Rights Act of 1964 which ensures that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

What is a Title VI Analysis?

It is a detailed analysis of proposed fixed-route bus service modifications and/or fare media adjustments to ensure that those modifications do not result in a disparate impact or a disproportionate burden on low-income populations.

DCTA is committed to ensuring that no person is excluded from participation in, or denied benefits of, its transit services based on race, color, or national origin.

TITLE VI ANALYSIS – DISPARATE IMPACT

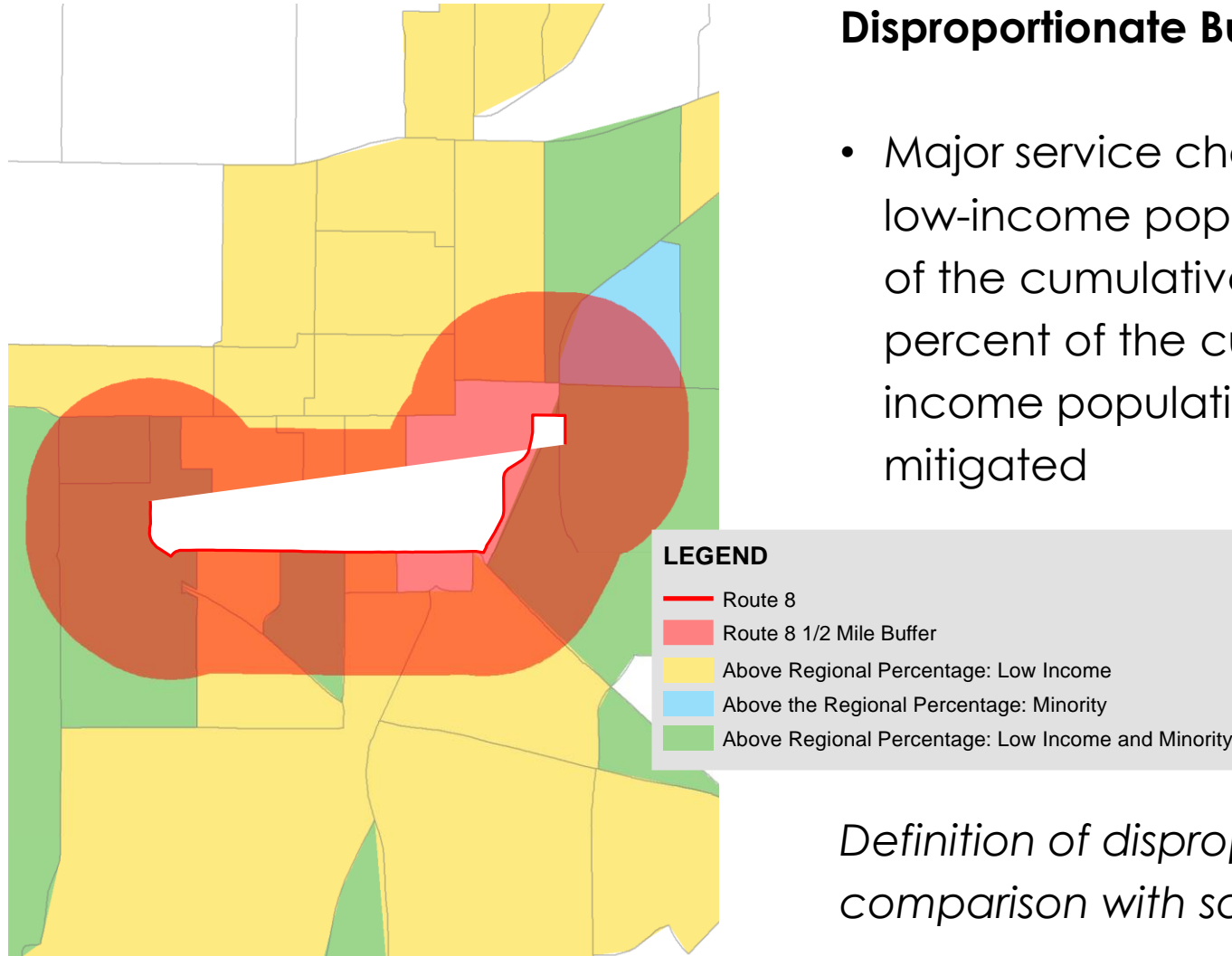


Disparate Impact Test

- Major service changes have a **disparate impact** if the minority populations experience five percent more of the cumulative burden, or experience less than five percent of the cumulative benefit, relative to the non-minority populations
- To avoid, minimize, or mitigate disparate impacts, DCTA develops and assesses alternatives and/or modifications to proposed changes that result in adverse impacts

Definition of disparate – essentially different in kind; not allowing comparison

TITLE VI ANALYSIS – DISPROPORTIONATE BURDEN



Disproportionate Burden Test

- Major service changes have a **disproportionate burden** if low-income populations experience more than five percent of the cumulative burden, or experience less than five percent of the cumulative benefit, relative to non-low-income populations unless the disproportionate impacts are mitigated

Definition of disproportionate – too large or too small in comparison with something else

TITLE VI ANALYSIS – ROUTE 5 RESULTS

Census Block Groups With 1/2 Mile of Denton Connect Route 5

Census Tract	Block Group	Total Population	Total Minority Population	Percent Total Minority	Ratio Total Minority to Regional Percentage	Individuals for Whom Poverty Status in Known	Total Below Poverty Population	Percent Below Poverty	Ratio Below Poverty to Regional Percentage	Minority Population Above Regional Percentage	Low Income Above Regional Percentage	Minority and Low Income Above Regional Percentage	SERVED BY DENTON CONNECT ROUTE 6
0211001	1	883	316	35.8%	0.683	883	129	14.6%	0.803	N	N	N	YES
0205042	2	2,033	979	48.2%	0.919	2,016	655	32.5%	1.785	N	Y	N	YES
0212023	3	2,402	1,628	67.8%	1.293	1,077	485	45.0%	2.475	Y	Y	Y	YES
0205041	1	1,231	725	58.9%	1.124	1,231	286	23.2%	1.277	Y	Y	Y	
0205053	3	950	101	10.6%	0.203	950	88	9.3%	0.509	N	N	N	
0212021	1	1,369	1,281	93.6%	1.785	1,323	593	44.8%	2.463	Y	Y	Y	YES
0206013	3	2,979	1,491	50.1%	0.955	1,197	444	37.1%	2.038	N	Y	N	YES
0205034	4	1,310	539	41.1%	0.785	1,310	234	17.9%	0.982	N	N	N	
0206012	2	813	586	72.1%	1.375	675	339	50.2%	2.760	Y	Y	Y	YES
0206022	2	2,525	1,654	65.5%	1.250	2,525	650	25.7%	1.415	Y	Y	Y	YES
0206023	3	577	500	86.7%	1.653	577	59	10.2%	0.562	Y	N	N	YES
0207003	3	614	203	33.1%	0.631	614	266	43.3%	2.381	N	Y	N	YES
0204011	1	4,984	1,925	38.6%	0.737	4,965	1,448	29.2%	1.603	N	Y	N	YES
0204023	3	1,251	128	10.2%	0.195	1,043	36	3.5%	0.190	N	N	N	YES
0204024	4	762	383	50.3%	0.959	699	132	18.9%	1.038	N	Y	N	YES
0204031	1	628	67	10.7%	0.204	628	206	32.8%	1.803	N	Y	N	YES
0204033	3	834	375	45.0%	0.858	834	380	45.6%	2.504	N	Y	N	YES
0205031	1	3,064	1,799	58.7%	1.120	3,064	1,091	35.6%	1.957	Y	Y	Y	YES
0205032	2	918	374	40.7%	0.777	918	234	25.5%	1.401	N	Y	N	YES
0205033	3	1,376	230	16.7%	0.319	1,376	621	45.1%	2.480	N	Y	N	YES
0205054	4	1,230	110	8.9%	0.171	1,230	17	1.4%	0.076	N	N	N	
0205055	5	1,151	263	22.8%	0.436	1,139	115	10.1%	0.555	N	N	N	
0205051	1	971	99	10.2%	0.195	971	133	13.7%	0.753	N	N	N	YES

Source: US Census Geodatabase: 'ACS_2017_5YR_BG_48_Texas.gdb'

TITLE VI ANALYSIS – ROUTE 8 RESULTS

Census Block Groups With 1/2 Mile of Denton Connect Route 8

Census Tract	Block Group	Total Population	Total Minority Population	Percent Total Minority	Ratio Total Minority to Regional Percentage	Individuals for Whom Poverty Status in Known	Total Below Poverty Population	Percent Below Poverty	Ratio Below Poverty to Regional Percentage	Minority Population Above Regional Percentage	Low Income Above Regional Percentage	Minority and Low Income Above Regional Percentage	SERVED BY DENTON CONNECT ROUTE 7
0211003	3	1,256	622	49.5%	0.945	1,256	859	68.4%	3.758	N	Y	N	YES
0211001	1	883	316	35.8%	0.683	883	129	14.6%	0.803	N	N	N	YES
0212023	3	2,402	1,628	67.8%	1.293	1,077	485	45.0%	2.475	Y	Y	Y	YES
0209002	2	2,575	1,398	54.3%	1.036	493	115	23.3%	1.282	Y	Y	Y	YES
0211002	2	995	506	50.9%	0.970	995	600	60.3%	3.314	N	Y	N	YES
0208001	1	1,570	1,025	65.3%	1.246	1,570	848	54.0%	2.968	Y	Y	Y	YES
0207001	1	1,253	454	36.2%	0.691	1,135	399	35.2%	1.932	N	Y	N	YES
0212021	1	1,369	1,281	93.6%	1.785	1,323	593	44.8%	2.463	Y	Y	Y	YES
0206013	3	2,979	1,491	50.1%	0.955	1,197	444	37.1%	2.038	N	Y	N	YES
0207002	2	935	441	47.2%	0.900	935	589	63.0%	3.462	N	Y	N	YES
0208002	2	3,248	1,069	32.9%	0.628	3,248	1,393	42.9%	2.357	N	Y	N	YES
0210004	4	944	492	52.1%	0.994	944	366	38.8%	2.131	N	Y	N	YES
0206012	2	813	586	72.1%	1.375	675	339	50.2%	2.760	Y	Y	Y	YES
0206022	2	2,525	1,654	65.5%	1.250	2,525	650	25.7%	1.415	Y	Y	Y	YES
0206023	3	577	500	86.7%	1.653	577	59	10.2%	0.562	Y	N	N	YES
0207003	3	614	203	33.1%	0.631	614	266	43.3%	2.381	N	Y	N	YES
0209001	1	2,301	1,498	65.1%	1.242	1,863	1,127	60.5%	3.324	Y	Y	Y	YES
0210001	1	694	303	43.7%	0.833	438	297	67.8%	3.726	N	Y	N	YES
0210002	2	3,704	1,793	48.4%	0.924	715	450	62.9%	3.459	N	Y	N	YES
0210003	3	785	464	59.1%	1.128	726	462	63.6%	3.497	Y	Y	Y	YES
0213011	1	3,254	983	30.2%	0.576	3,254	1,727	53.1%	2.916	N	Y	N	

Source: US Census Geodatabase: 'ACS_2017_5YR_BG_48_Texas.gdb'

TITLE VI ANALYSIS - FINDINGS

Route 5 Results:

- 18 of the 23 census block groups associated with Route 5's service area are also located in the Route 6 service area
- Findings demonstrate that Routes 5 and Route 6 serve the same communities and that minority and low-income populations will be able to access Route 6 to get to their destinations and connect to the larger DCTA network

Route 8 Results:

- 20 of the 21 census block groups associated with Route 8's service area also located in the Route 8 service area
- Findings demonstrate that Routes 8 and 7 serve the same communities and that minority and low-income populations will be able to access Route 7 to get to their destinations and connect to the larger DCTA network

DCTA's initial Title VI Analysis and review of demographic characteristics associated with the proposed fixed route modifications demonstrates that no adverse disparate impacts will result from the proposed service changes.

TITLE VI ANALYSIS

Denton County Transportation Authority (DCTA) complies with Title VI of the Civil Rights Act and provides services and operates programs without regard to race, color, and national origin in accordance with Title VI. Any person who believes he or she has been subjected to an unlawful discriminatory practice under Title VI may file a complaint with DCTA.

For more Information about DCTA's Title VI obligations and the [procedures to file a complaint](#) contact 972.221.4600, email dctainfo@dcta.net or visit our offices 1955 Lakeway Drive, Suite 260, Lewisville, TX 75057.

A complaint may also be filed directly with the Federal Transit Administration's Office of Civil Rights, Attention: Title VI Programs Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.



FEEDBACK OPPORTUNITIES



FEEDBACK OPPORTUNITIES

Your feedback is critical to best inform the agency's decision-making process related to services, programs and projects.

DCTA welcomes all feedback. Below are various options you can use to submit detailed feedback for consideration.

- **Online Feedback Form** – <https://www.dcta.net/about-dcta/public-engagement>
- **Email** – mworthington@dcta.net
- **Mail** – Written feedback can be sent to DCTA, Attn: Community Relations, P.O. Box 96, Lewisville, TX 75067
- **Phone** – Contact Mary Worthington at 972.316.6121
- **GORequest** – Available via mobile and desktop at <https://www.dcta.net/gorequest>



CONTACT INFORMATION



CONTACT INFORMATION



For any questions related to DCTA's public involvement process, please contact:

Mary Worthington
Community Relations Manager
972.316.6121
mworthington@dcta.net

Appendix I – FTA Triennial Title VI Findings

Summary of Findings

10. Title VI	TVI2-1	Language Assistance Plan deficiencies	DCTA must submit to the FTA RCRO documentation that its operating contractors have implemented training according to the LAP. DCTA must provide documentation that the half fare application, has been translated as outlined in the LAP.	September 4, 2018	May 28, 2019
	TVI8-1	Impact of fare and/or service changes not adequately examined	DCTA must submit to the FTA RCRO and updated Title VI program including the required elements. The recipient must also submit to the FTA RCRO revised procedures to ensure that future equity analyses will be conducted as required. DCTA must review and revise the Xpress service equity analysis and submit to the RCRO.	September 4, 2018	May 28, 2019