



City of Boulder Transit Program

Title VI Plan

December 2021



Title VI Plan – City of Boulder Transit Program

INTRODUCTION

Title VI of the Civil Rights Act of 1964 requires that no person in the United States of America shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise subjected to discrimination under any program or activity provided by the recipient of federal assistance. To fulfill this basic civil rights mandate, each federal agency that provides financial assistance for any program is authorized and directed by the United States Department of Justice to apply provisions of Title VI to each program by issuing applicable rules, regulations, or requirements.

This document serves as the City of Boulder Transit Program's Title VI Plan, as required of subrecipients of Federal Transit Administration (FTA) funding per FTA Circular 4702.1B dated October 1, 2012. The City of Boulder is a subrecipient of the Colorado Department of Transportation (CDOT) Division of Transit and Rail and is eligible to receive FTA funding in support of its transit program.

The City of Boulder is fully 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.



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BACKGROUND

The City of Boulder is located along the Front Range in north-central Colorado and in the northwest part of the Greater Denver region. Boulder is part of the Boulder, CO metropolitan statistical area (MSA) and the Denver-Aurora, CO combined statistical area. Per the 2019 American Community Survey, the city has an estimated population of 105,673.¹ Table 1 reflects the estimated race and Hispanic origin percentages of Boulder.

Table 1: 2019 Racial and Hispanic Origin Population Percentages, Boulder, CO

US Census ACS Population Estimates, July 1, 2019 Boulder city, Colorado	
Race and Hispanic Origin	Percentage
White alone	87.4%
Black or African American alone	1.2%
American Indian and Alaska Native alone	0.2%
Asian alone	5.8%
Native Hawaiian and Other Pacific Islander alone	0.1%
Two or More Races	2.8%
Hispanic or Latino	9.7%
White alone, not Hispanic or Latino	79.6%

Since 1994, the City of Boulder has managed the contracted service of the HOP fixed-route bus service in Boulder that is operated by Via Mobility Services. HOP annual operations are funded in partnership agreements between the Regional Transit District (RTD), University of Colorado Boulder (CU), and the City of Boulder. Contract management and compliance monitoring of the contracted HOP transit service is the responsibility of the City of Boulder Transit Program Manager, who works within the Transportation Planning Division of the Transportation & Mobility Department. The Transit Program office is located at 1101 Arapahoe Avenue, Boulder, CO 80203.

The HOP routes, clockwise and counterclockwise, have been in service since 1994 and travel on a 5.5-mile loop throughout the city, connecting Pearl Street, the Downtown Boulder Transit Center, University of Colorado Boulder, Twenty Ninth Street Mall, and Boulder Junction and with multiple RTD regional and local bus routes. The route operates seven (7) days a week and provides approximately 750,000 annual rides with passengers using the route to access education, work, medical and social services, retail, and recreational opportunities.

¹ The 2019 population estimate does not reflect group quarters data, such as CU dormitory residents. The 2018 5-Year ACS used to develop the language assistance plan estimates the Boulder County (Central) – Boulder City Public Use Microdata Area (PUMA) population as 125,612 which includes group quarters data.



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CITY OF BOULDER TITLE VI ASSURANCES

This City of Boulder is committed to ensuring its transit program and services comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21.

The City of Boulder assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. The City of Boulder further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

NOTICE TO THE PUBLIC

Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964

The City of Boulder operates its transit program and services without regard to race, color, or national origin. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination because of their race, color, or national origin may file a Title VI discrimination grievance.

For more information on the City of Boulder Transit Program’s civil rights VI plan and the procedures to file a grievance, please visit the following website:

<https://bouldercolorado.gov/services/hop-bus>

Or contact:

City of Boulder Transit Program
1101 Arapahoe Avenue
Boulder, CO 80203
Email: HOPBus@bouldercolorado.gov

If information is needed in another language, please send an email to HOPBus@bouldercolorado.gov or call (303) 441-3217.

Additional information about Title VI is available on the Federal Transit Administration’s website at: <https://www.transit.dot.gov/title6>



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Notice Locations:

The Notice to the Public is posted on the city's webpage for its transit program and on-board the HOP bus fleet in Boulder. The notice can be accessed at the following weblink: <https://bouldercolorado.gov/services/hop-bus>

GRIEVANCE PROCEDURE

Grievance Submission

If a person believes that they or specific class of persons has been discriminated against by the City of Boulder's Transit Program or one of its contracted subrecipients on the basis race, color or national origin in violation of Title VI, such person has the right to file a grievance with the city's Title VI Coordinator. The grievance should be documented in writing and submitted within one hundred eighty (180) days of the alleged discriminatory act or decision.

Title VI grievance forms, in English and Spanish, are available on the city's Transit Program webpage at the following link: <https://bouldercolorado.gov/services/hop-bus>The forms are also located in **Appendix A**.

Should a complainant choose to not use the grievance form, a written statement can be submitted that includes the following:

1. Grievant name, address, telephone number and any other contact information.
2. The basis of the grievance (race, color, national origin)
3. Date(s) on which the alleged discriminatory event(s) occurred
4. Details of the incident(s)
5. Names and contact information of witnesses
6. Other agencies where a grievance was filed regarding the same incident(s)

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, or for information in another language, please contact the City of Boulder Transit Program at HOPBus@bouldercolorado.gov or (303) 441-3217.

Completed Title VI grievance forms or written statements can be delivered or emailed to the following addresses:

City of Boulder Transit Program
1101 Arapahoe Avenue
Boulder, CO 80203
Email: HOPbus@bouldercolorado.gov
Title VI program information: <https://bouldercolorado.gov/services/hop-bus>



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A Title VI grievance may also be filed directly with the following agencies:

Via Mobility Services (HOP operator)
2855 N. 63rd Street
Boulder, CO 80301
Phone: (303) 447-2848, extension 1047
Email: title.vi.complaint@viacolorado.org
Title VI program information: <https://viacolorado.org/contact/file-a-complaint/>

Regional Transit District (RTD) (HOP funding partner)
1660 Blake Street, FAS-73
Denver, CO 80202
Phone: (303) 299-6000
Email: titlevicomplaints@rtd-denver.com
Title VI program information: <https://www.rtd-denver.com/reports-and-policies/title-vi-policy>

Colorado Department of Transportation
Civil Rights & Business Resource Center
2829 W. Howard Place, Suite 139
Denver, CO 80204
Phone: (800) 925-3427
Email: dot_civilrights@state.co.us
Program information: <https://www.codot.gov/business/civilrights/titlevi>

Federal Transit Administration (FTA)
Office of Civil Rights
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington, DC 20590
Email: FTACivilRightsCommunications@dot.gov
Program information: <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>

Grievance Review and Response

Once a Title VI grievance is received by the City of Boulder, the City of Boulder will determine if it has jurisdiction to investigate. If City of Boulder has jurisdiction, it will issue an acknowledgment letter to the Grievant.

The City of Boulder has sixty (60) days to investigate the grievance. If more information is needed to resolve the case, the City of Boulder may contact the Grievant. The Grievant



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will have fifteen (15) business days from the date of the information request to send any information to the investigator assigned to the case. If the investigator is not contacted by the Grievant or does not receive the additional information within fifteen (15) business days, the City of Boulder can administratively close the case. A case can also be administratively closed if the Grievant no longer wishes to pursue their case.

After the investigator reviews the grievance, the investigator will issue one (1) of two (2) letters to the Grievant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the Grievant wishes to appeal the decision, Grievant has fifteen (15) business days after the date of the letter or the LOF to do so.

The Grievant or authorized representative may appeal the investigator's final close-out response through writing the City Manager:

City Manager
City of Boulder
P.O. Box 791
Boulder, CO 80306

Grievant's appeal, including a detailed description of its basis, shall be sent no later than thirty (30) calendar days after the date of the investigator's final close-out response. Within thirty (30) calendar days after receipt of the appeal, the City Manager will designate a third party to act as appeal officer (the "Appeal Officer"). The Appeal Officer shall attempt to meet with the Grievant to discuss the grievance and possible resolutions. The Appeal Officer will be a representative well-versed in Title VI law, rules and regulations. Within forty-five (45) days calendar days after the filing of the appeal, the Appeal Officer shall respond, with a final resolution of the grievance.

The investigator, the City Manager or his/her designee and the Appeal Officer may extend the deadlines noted herein for cause and with notification to the Grievant.

If the Grievant is not satisfied with the outcome, such person also has the right to file a grievance with an external entity, including the FTA which provides federal assistance to the City of Boulder Transit Program. Information about filing a Title VI complaint with the FTA is at the following link:

<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/file-complaint-fta>

Grievance Record Retention:

The Transit Program Manager will retain Title VI grievances, investigative records, and close-out responses for a period of at least three (3) years to coincide with the recurring triennial update requirement of the city's Transit Program Title VI Program.



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Grievance forms submitted to the Transit Program are open to inspection pursuant to the Colorado Open Records Act, Colorado Revised Statutes §24-72-101, et. seq.

LIST OF TITLE VI GRIEVANCES, INVESTIGATIONS AND/OR LAWSUITS

Under the requirements of Title VI, the City of Boulder maintains a list of any formal grievances, active investigations, and lawsuits related to an allegation of discrimination on the basis of race, color, or national origin specific to the city's Transit Program and Services. At present time, the City of Boulder has no grievances, investigations, or lawsuits to report.

Title VI grievances, investigations, and lawsuits will be tracked and reported in subsequent Title VI Program updates.

PUBLIC PARTICIPATION PLAN

The City of Boulder has long been a community that values and supports inclusive public participation and processes, and this approach is central to ensuring the city's Transit Program and Services are responsive to community needs and provided with equity.

Boulder defines engagement as an active, expansive relationship between the city and the community that includes any level of public participation; this typically encourages two-way dialogue. Public participation is a type of engagement that usually occurs in decision-making processes. It can define minimum standards, such as public hearings, comment periods and open records. It also can indicate a range of public involvement approaches from informing to partnering and collaboration.

The City of Boulder employs the following methods to reach and engage the public—including minority, low-income, and LEP populations—in providing updates and soliciting feedback related to the city's current and future transit programs and services:

1. **Dedicated webpage for HOP Bus services:** Information about HOP bus service is provided on a dedicated webpage on the city's website at the following link: <https://bouldercolorado.gov/services/hop-bus>. The webpage also includes information about the Title VI program and grievance procedures.
2. **Dedicated email address for HOP Bus comments and inquiries:** Comments and inquiries about the HOP bus are accepted, monitored, and responded through a dedicated email address, HOPbus@bouldercolorado.gov, that is advertised on the HOP Bus webpage and in printed schedule brochures.
3. **Social Media Channels:** The city employs and actively manages social media channels to inform community members about city services and programs and to



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provide additional engagement opportunities outside of scheduled public meetings.

4. **Printed Pocket Schedules and Passenger Information:** Printed HOP schedules and passenger information are available on buses and at Downtown Boulder Station.
5. **Passenger Surveys:** HOP passenger surveys may be periodically conducted to better understand HOP passenger demographics, fare trends, trip needs, and service preferences.
6. **City Newsroom:** The City of Boulder's online newsroom serves as a one-stop destination for the latest city news and information, including articles, news releases, photos and videos.
7. **Dedicated City Webpage for Information in Spanish:** A city webpage is dedicated to providing public information in Spanish, including:
 - Existing city programs, services and content available online in Spanish;
 - Requesting a free interpreter for any city meeting;
 - Signing up to receive city information in Spanish through a text message communication pilot known as City Text Boulder; and

The webpage is at: <https://bouldercolorado.gov/informacion-en-espanol>

The city's website also features a Google translate button on each webpage to translate English text to Spanish.

8. **Electronic Newsletters:** The public can sign up for the city's electronic newsletters for periodic updates on popular topics, including updates from the Transportation & Mobility Department.
9. **Community Newsletter:** Boulder's quarterly community newsletter aims to keep residents informed about the myriad city projects and plans happening every day. It is mailed to city residents and can be accessed online.
10. **Boulder 8 Television:** The city government's television station records and broadcasts City Council meetings, public service announcements (PSAs), and weekly news/talk show to highlight important issues impacting the city. Public is able to watch via local cable television and online (live broadcasts and playback).
11. **Inquire Boulder submissions and response:** Inquire Boulder is the city's online 24/7 customer service portal used by members of the public to submit issues to the city, which includes a category for issues specific to transit. Issue status is tracked from the time an issue is opened through completion, with goal of timely



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and superior customer service response within 10-days of issue submission. Customer satisfaction surveys are sent to respondents and used to track response trends.

12. **Be Heard Boulder:** Be Heard Boulder is the city's online, 24/7 digital engagement platform that offers a variety of includes of interactive tools, including discussion forums, polls, surveys and crowdsource mapping on featured projects and issues. This medium will be used when community discussion and feedback is sought for specific transit programs, services and projects.
13. **Group Meeting or Presentation:** City staff are available as schedules and resources permit to speak to community groups about the city's transit program and services.
14. **Open Houses and Public Meetings:** The City of Boulder will often use online feedback in conjunction with face-to-face consultation activities – such as meetings, open houses or surveys – to reach a more representative cross-section of our community. Concerted efforts to offer open houses and public meetings at times and locations that are convenient and accessible for minority and low-income populations.
15. **Transportation Advisory Board (TAB) Meetings:** The Transportation Advisory Board (TAB) meets monthly in a public forum and advises City Council, Planning Board and city staff on community transportation issues – including the city's transit program and services. Transit programs, projects, and issues are routinely formally discussed with TAB. Opportunities for public participation and comment are solicited and available at TAB meetings.
16. **City Council Meetings:** Boulder City Council values hearing from community members and provides open comment feedback and public hearing opportunities at all regular meetings.

LANGUAGE ASSISTANCE PLAN

The City of Boulder's language assistance plan is a critical guide for ensuring meaningful access to benefits, services, and information related to its transit program and services for individuals who are limited-English proficient (LEP).

Please see **Appendix B** for the language assistance plan. The language assistance plan is also available on the City of Boulder's Transit Program webpage at the following link: <https://bouldercolorado.gov/services/hop-bus>



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ADVISORY BOARDS

The Transportation Advisory Board (TAB) advises City Council, Planning Board and city staff on community transportation issues, including those specific to the city's transit program and services. TAB is comprised of five (5) members appointed by the City Council. TAB meets monthly in open forum, where inclusive opportunities for public comment are advertised and encouraged for the consideration of the public good.

The City Council advertises and seeks to fill vacancies for boards and commissions, including TAB, on an annual basis. Board membership diversity is sought and welcomed, as reflected in the following diversity statement that guides the application process:

The City of Boulder believes that a diverse work force adds quality and perspective to the services we provide to the public. Therefore, it is the ongoing policy and practice of the City of Boulder to strive for equal opportunity in employment for all employees and applicants. No person shall be discriminated against in any term, condition or privilege of employment because of race, national origin, religion, disability, pregnancy, age, military status, marital status, genetic characteristics or information, gender, gender identity, gender variance or sexual orientation.

The Boulder City Charter requires representation of both genders on City Boards and Commissions.

Council is seeking individuals with extensive experience on government boards and/or bodies, with knowledge of public policy development and government processes, to actively collaborate and build a strong board foundation.

The following list provides the racial makeup and term of the current TAB members:

1. Member 1: White Male, (April 2020 - March 2022)
2. Member 2: White Male, (April 2018 - March 2023)
3. Member 3: White Female, (April 2021 - March 2025)
4. Member 4: White Male (April 2019 - March 2024)
5. Member 5: White Male (April 2021 - March 2026)



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SUBRECIPIENT MONITORING

The City of Boulder contracts the operations of the HOP fixed-route transit services with Via Mobility Services. As part of this financial arrangement, Via Mobility Services is a subrecipient of federal transit funds that are passed through the City of Boulder from CDOT.

As part of its annual service contract for the HOP route, the city requires Via Mobility Services to maintain Title VI program compliance with CDOT, post notice of rights to the public on the HOP bus fleet and its website, and report any Title VI grievances specific to the HOP service to the city. The city monitors Via's Title VI compliance on an annual basis through requesting, reviewing, and keeping on file Via's current Title VI plan; verifying and documenting Via's efforts in posting its Title VI Notice to the Public online and on-board the HOP buses; and keeping a three-year digital library of Title VI grievance files specific to the HOP service that were filed and investigated by Via.

FACILITY LOCATION AND EQUITY ANALYSIS

In the past three (3) years, the City of Boulder has not planned to construct, expand, or purchase a transit facility.

TRANSIT PROVIDER: FIXED ROUTE SYSTEMWIDE SERVICE STANDARDS

FTA requires operators of fixed-route transit services to set systemwide service standards for each fixed route mode of service provided and include the service standards in the Title VI Plan. The following service standards are specific to HOP bus operations:

Vehicle loads: Passengers per service hour should not exceed 95% of seated capacity per direction. Seated capacity for HOP buses is 27.

Vehicle headway: Consistent with RTD service standards for local routes, HOP service frequency standards include a minimum of 30-minutes during weekday peak hours and 60-minutes during weekday off-peak hours, weekends, and holidays.

On-time performance: On-time performance is considered between one minute early and five minutes late (excluding terminal departures) from timepoint departure. The on-time performance standard is 90% for HOP trips.

Service availability: As feasible, the HOP operates with a 15-hour service span, 7:00 AM to 10:00 PM on weekdays, Saturdays and Sundays. Reduced service spans are provided on holidays.



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FIXED ROUTE SYSTEMWIDE SERVICE POLICIES

Transit Amenities: Bus stop design and amenity placement is coordinated with RTD design guidelines. Generally, shelter placement is prioritized for bus stops where ridership exceeds 50 passenger boardings per day, and as determined by RTD’s shelter installation criteria evaluation process. The criteria include service levels, available physical space, operational safety, ADA access, Title VI, and other considerations.

Vehicle Assignment: The 15-bus fleet assigned to the HOP route is rotated to spread fleet mileage across the entire fleet, allow for ongoing preventative maintenance work, and maximize the useful life of the fleet.

COPY OF GOVERNING ENTITY APPROVAL

The City of Boulder Transit Program Title VI Plan was approved by _____ on _____ . Related documentation is in **Appendix C**.



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APPENDIX A Title VI Grievance Forms



City of Boulder Transit Program Title VI Grievance Form

Contact information of person completing this grievance:

Name: _____

Address: _____ City: _____ Zip: _____

Phone: _____

Email: _____

Basis of Grievance (circle all that apply):

Race	Color	National Origin
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Who discriminated against you?

Name: _____

Name of Organization: _____

Address: _____ City: _____ Zip: _____

Phone: _____

How were you discriminated against? (Please provide specific details - attach additional pages if more space is needed)

Where did the discrimination occur?

Dates and times discrimination occurred?



City of Boulder Transit Program Title VI Grievance Form

Were there any other witnesses to the discrimination?

Name	Organization/Title	Telephone	Email

How would you like to see this situation resolved?

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who: _____ When: _____

Status (pending, resolved, etc.): _____ Result, if known: _____

Complaint number, if known: _____

Do you have an attorney in this matter?

Name: _____ Phone: _____

Address: _____ City: _____ Zip: _____

Signed: _____ Date: _____

Please return signed form to the following address:

Title VI Coordinator
 City of Boulder Transit Program
 1101 Arapahoe Avenue
 Boulder, CO 80203
 Email: HOPbus@bouldercolorado.gov



Programa de Tránsito de la Ciudad de Boulder Formulario De Queja Del Título VI

Información de contacto de la persona que completa esta queja:

Nombre: _____

Dirección: _____ Ciudad: _____ Código Postal:

Teléfono: _____

Correo electrónico: _____

Base de queja (circule todo lo que corresponda):

Raza	Color	Origen nacional
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¿Quién lo discriminó?

Nombre: _____

Nombre de la organización: _____

Dirección: _____ Ciudad: _____ Código Postal: _____

Teléfono: _____

¿Cómo lo discriminaron? (Proporcione detalles específicos - adjunte páginas adicionales si se necesita más espacio)

¿Dónde ocurrió la discriminación?

¿Se produjeron fechas y horas de discriminación?



**Programa de Tránsito de la Ciudad de Boulder
Formulario De Queja Del Título VI**

¿Hubo otros testigos de la discriminación?

Nombre	Organización/Título	Teléfono	Correo electrónico

¿Cómo le gustaría que se resolviera esta situación?

¿Ha presentado su queja, o demanda ante alguna otra agencia o tribunal?

Quién: _____ Cuando: _____

Estado (pendiente, resuelto, etc.) : _____ Resultado, si se conoce: _____

Número de reclamo, si se conoce: _____

¿Tiene a un abogado en este asunto?

Nombre: _____ Teléfono: _____

Dirección: _____ Ciudad: _____ Código Postal: _____

Firmado: _____ Fecha: _____

Por favor, devuelva el formulario firmado a la siguiente dirección:

Coordinador del Título VI
Programa de Tránsito de la Ciudad de Boulder
1101 Arapahoe Avenue
Boulder, CO 80203
Correo electrónico: HOPbus@bouldercolorado.gov



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APPENDIX B Language Assistance Plan



City of Boulder Transit Program

Language Assistance Plan

November 2021



Language Assistance Plan, City of Boulder Transit Program

INTRODUCTION

The Need for a Language Assistance Plan

Individuals with a limited ability to read, write, speak, or understand English are limited English proficient, or “LEP.” This language barrier may prevent individuals from accessing public services and benefits—including public transit services.

Consistent with Title VI of the Civil Rights Act of 1964, the U.S. Department of Transportation’s (DOT) implementing regulations, and Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (65 FR 50121, Aug. 11, 2000), recipients and subrecipients of federal funding shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-LEP. The Federal Transit Administration (FTA) further details responsibilities and requirements of its recipients and subrecipients in FTA Circular 4702.1B (October 1, 2012) “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” including the program requirement for a language assistance plan.

As a subrecipient of FTA funding through the Colorado Department of Transportation (CDOT), the City of Boulder has developed this language assistance plan to meet federal LEP requirements for its transit program and services. The primary plan components include an assessment of the LEP population and needs in the service area, a summary of current language assistance efforts, and future monitoring steps to ensure meaningful access to the city’s transit programs and services by persons with limited English proficiency.



Language Assistance Plan, City of Boulder Transit Program

FOUR FACTOR ANALYSIS

The DOT guidance outlines “four factors” recipients are to consider when assessing language needs and determining appropriate steps to ensure meaningful access to services for LEP services. Through conducting the “Four Factor Analysis,” the City of Boulder Transit Program is better positioned to formalize and implement a cost-effective and appropriate mix of proactive language assistance measures and to respond to requests for LEP assistance from constituents.

The four factors are as follows:

- 1.) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
- 2.) The frequency with which LEP individuals come in contact with the program.
- 3.) The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
- 4.) The resources available to the recipient and the overall cost.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.

For planning and assessment purposes, the City of Boulder considers its transit service area as its city limits that has a geographic area of 24.66 square miles. Per the 2019 U.S. Census American Community Survey (ACS), the city has an estimated population of 105,673. ACS 2019 language data is currently not available at the city geographic level.

The most recent ACS data release with language data specific to Boulder is available for larger geographic area than the Boulder city limits, known as the “Boulder County (Central) – Boulder City Public Use Microdata Area (PUMA).” The PUMA includes the City of Boulder, and parts of unincorporated Boulder County, City of Lafayette, and City of Louisville (see **Appendix A** for a related map). Per the 2018 ACS 5-Year estimates, the estimated total population of the Boulder County (Central) – Boulder City PUMA is 125,612. For the purposes of this assessment, the PUMA dataset is used below in discussing LEP population totals and percentages in the community.



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Per the 2018 ACS estimates, it is estimated that 4.0% (5,050 of 125,612) of the area’s population speak English less than “Very well” and likely have limited English proficiency as detailed in Table 1.

Table 1: ACS 5-Year Estimates (2018) – Ability to speak English (ENG)

ACS 5-Year Estimates (2018) - Ability to speak English (ENG) Census Geography: Boulder County (Central)--Boulder City PUMA, Colorado		
	Population	Percentage
N/A (less than 5 years old/speaks only English)	107,574	85.6%
Very well	12,978	10.3%
Well	3,314	2.6%
Not well	1,499	1.2%
Not at all	247	0.2%
Total Population	125,612	100.0%
Subtotal Population: Less Than "Very well"	5,060	4.0%

Specific to the HOP route alignment, demographic analysis indicates an estimated population of 18,881 reside within ¼-mile of the HOP route and 4.0% of that population (estimate 755 of 18,881) speak English less than “Very well.”

Federal guidance recommends translation services of vital documents be considered for LEP language groups that constitute 5% or 1,000 persons (whichever is less) of the total population to be served by transit programs and services. The 5% or 1,000 persons LEP population subset within a geographic area is also referred to as the Safe Harbor threshold.

For the Boulder PUMA, 2018 ACS data reveals there are four (4) languages other than English spoken at home by more than 1,000 people: Spanish, Chinese, German, and French as detailed in Table 2.



Table 2: ACS 5-Year Estimates (2018) – Language spoken at home (LANP)

ACS 5-Year Estimates (2018) - Language spoken at home (LANP) Census Geography: Boulder County (Central)--Boulder City PUMA, Colorado		
Language*	Population	Percentage
English	107,574	85.6%
Spanish	8,008	6.4%
Chinese	1,411	1.1%
German	1,234	1.0%
French	1,097	0.9%
All other languages	6,288	5.0%
Total population	125,612	100.0%
Subtotal - Languages other than English	18,038	14.4%

* NOTE: Language with 1,000+ speakers or greater than 5% of total population (Safe Harbor provision)

Factor 2: The frequency with which LEP individuals come in contact with the program.

As the City of Boulder’s HOP transit service is open to the public, LEP individuals are likely to seek route information and access to the service.

Without a recent demographic survey of HOP riders, the frequency of LEP individual contact with the HOP route is undetermined. Yet, ridership data from Via Mobility Services was used to estimate the frequency in which LEP individuals may come in contact with the HOP services. Via Mobility Services operates paratransit services across the metropolitan area as well as the HOP bus route in Boulder. Via’s Routematch reservation and scheduling software system for paratransit services includes a rider database that identifies rider by language spoken. According to 2019 data from the Routematch database, approximately 8% of Via’s riders self-identified as Spanish-speakers. Another 7% of Via’s riders self-identified as speaking a variety of languages other than English—though less than 1% for any specific language. Hence, approximately 15% of Via riders may be LEP individuals.

Assuming Via’s 15% LEP ridership, an estimated 324 of the 2,162 average daily riders (2019 count) may be LEP.



Language Assistance Plan, City of Boulder Transit Program

Factor 3: The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.

The nature and importance of the Boulder transit program and services is high for the LEP Community, as the HOP transit service provides critical mobility for people to access employment, education, medical, retail, social, and other opportunities central to life.

Factor 4: The resources available to the recipient and the overall cost.

Language resources available for those seeking route information and how to access the HOP are provided by both the City of Boulder and Via Mobility Services, the operator of the HOP.

City of Boulder resources:

- The city's webpages specific to the city's transit program and the HOP bus route, have a Google translate feature that allows for the interpretation of text into 98 languages – including the four languages identified in the Four Factor Analysis with more than 1,000 speakers in the community (Spanish, Chinese, French, and German).
- The city has Spanish translation services available to ensure vital documents related to the city's transit program and services can be translated in Spanish.
- The city also has trained staff and volunteers who are available to provide Spanish translation services at community meetings and outreach events regarding the city's transit program and services.
- City staff has access to a telephone service that provides language interpreters in multiple languages, and third-party calls involving the LEP individual, city staff, and interpreter can be arranged.
- The city routinely publishes community news and produces news videos in Spanish.

Via Mobility Services resources:

- Via Mobility Services website has a Google translate feature that provides Spanish translation for its webpages.
- Callers to Via's Call Center hear a bilingual recorded message that includes a prompt to reach Spanish bilingual customer service representatives.



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- Via has a Spanish bilingual Mobility Specialist that serves as the first point of contact for prospective riders and provides rider training. This is a customer-friendly transportation counseling service in which the various mobility options are explored and the customer is directed to the most appropriate program to meet his or her transit needs.
- Via conducts travel training sessions with Spanish bilingual Mobility Specialists and printed materials in Spanish
- Via publishes and posts on its website outreach materials and critical user information in Spanish, including the following:
 - Information guides for new riders
 - Informational brochures about Via Mobility Services, transportation services, and mobility options.
 - Via's Title II ADA Policy and Complaint Process
 - Via' Title VI Civil Rights Notice to the Public and Complaint Form

These services are currently available and related costs are incurred by respective city and Via Mobility Services operating budgets.

IMPLEMENTING THE LEP PLAN

The DOT LEP Guidance recommends that recipients develop an implementation plan to address the needs of the LEP populations they serve. The DOT LEP notes that effective implementation plans typically include the following five steps:

1. Identifying LEP individuals who need language assistance.
2. Providing language assistance measures.
3. Training staff.
4. Providing notice to LEP persons.
5. Monitoring and updating the plan.

Step 1. Identifying LEP individuals who need language assistance.

As detailed in the Four Factor Analysis, latest census data and Via's ridership demographics confirms the continued need to provide language assistance services for Spanish speakers in relation to the city's transit services and program, particularly the HOP route.



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The city will continue to coordinate with Via Mobility Services in monitoring the frequency LEP individuals contact the Via Call Center, attend rider training and outreach events, and interact with HOP operators. Demographic trends and the frequencies of LEP individual encounters may direct the need to offer language assistance in languages other than Spanish.

A demographic passenger survey of HOP riders is recommended in the future as another resource to further understand the estimated percentage of LEP riders.

Step 2. Providing language assistance measures.

The following language assistance materials and services in Spanish are recommended for continued use and updates:

Materials:

- Information guides for new riders
- Passenger bulletins
- On-board placards notifying riders of language assistance via
- Title II ADA Policy and Complaint Process
- Title VI Civil Rights Notice to the Public and Complaint Form

Services:

- Google webpage translation services – Spanish plus multiple languages (City of Boulder and Via Mobility Services)
- Spanish-speaking call center agents at the Via Call Center
- Travel training services by a Spanish bilingual Mobility Specialist
- Interpreters at community meetings and outreach activities.

As financially feasible, language line access for Via Call Center representatives is recommended to provide language assistance for individuals needing route and service information in languages other than Spanish.

Step 3. Training staff.

The city will annually ensure that Via Mobility Services continues the following staff training activities to serve Spanish-speaking customers of the HOP transit service:

- **Call Center Agents:** The Call Center is staffed by several Spanish bilingual



Language Assistance Plan, City of Boulder Transit Program

reservationists who are trained in cultural competency.

- **Operators:** Each new operator receives a “Basic Spanish for Transit Employees” handbook. Training includes a session in cultural competency.
- **Travel Trainers:** Cultural competency and Spanish bilingual training as necessary to ensure one Spanish-speaking travel trainer is on staff.

The city will also continue its training program of staff and volunteers to provide interpretation at community engagement activities.

Step 4. Providing notice to LEP persons.

The city posts its language assistance plan on its webpage specific to its HOP transit services. Digital copies of the language assistance plan are provided to the operational partners of the HOP—Via Mobility Services, RTD, and University of Colorado Boulder. Digital copies are also provided to the Boulder County Local Coordinating Council, Mobility for All,

Step 5. Monitoring and updating the plan.

The city will annually monitor Census and ACS data releases specific to community LEP demographics. The city will also annually assess the call volume and frequency of encounter Via Mobility Services and city staff have with LEP individuals seeking information on the HOP service. Emerging LEP demographic and rider trends may result in the need to accordingly adjust the language assistance plan.

Full review and update of the LEP Plan will occur with each triennial Title VI program submission to CDOT and FTA.

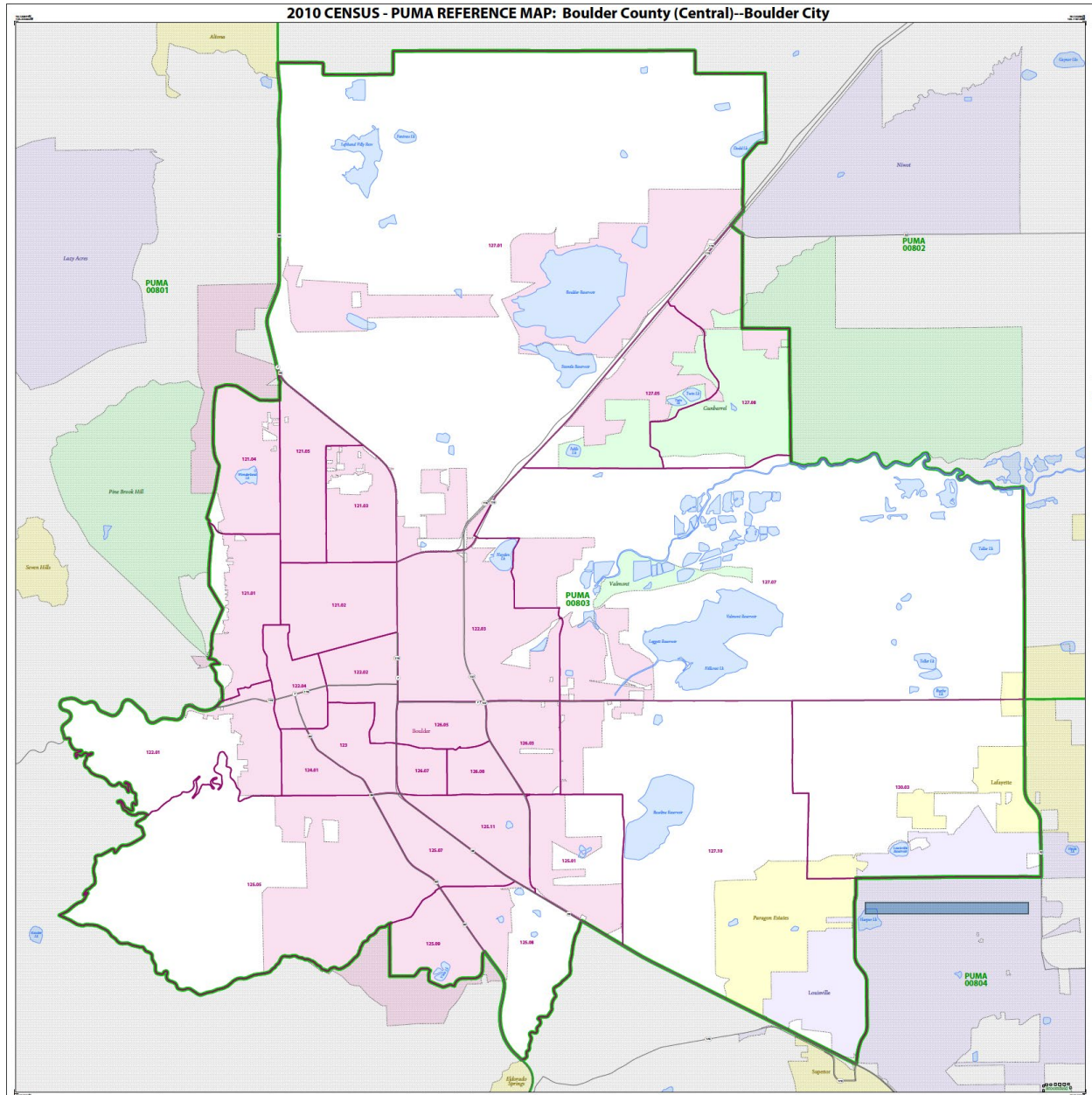


Language Assistance Plan, City of Boulder Transit Program

APPENDIX A: MAP - Boulder County (Central) – Boulder City PUMA



MAP - Boulder County (Central) – Boulder City PUMA





Title VI Plan – City of Boulder Transit Program

APPENDIX C Governing Entity Approval

THE CHARTER OF THE CITY OF BOULDER, COLORADO
ARTICLE V. - ADMINISTRATIVE SERVICE
The City Manager

The City Manager

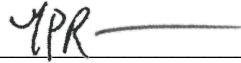
Sec. 63. The city manager-qualifications and appointment.

The city manager shall be the chief executive and administrative officer of the city. As such, the manager shall possess, have, and exercise all the executive and administrative powers vested in the city. The manager shall be chosen by the council solely on the basis of executive and administrative qualifications. The choice need not be limited to the inhabitants of the city or state.

The city manager shall devote full time and business interest to the management of the city's affairs, and shall not, during the manager's term of office, be an employee of, or perform any executive duty for any person, firm, corporation, or institution other than the City of Boulder. The manager's salary shall be fixed by the council. The manager shall be appointed for an indefinite period, and shall be removable by the council at pleasure. If removed at any time after six months of service, the manager may demand written charges and a public hearing on the same before the council, and the same shall be given the manager prior to the date on which the manager's final removal shall take effect. Pending such hearing, the council may suspend the manager from office; and during such suspension, or in case of the manager's absence or disability from any other cause, the council shall designate some properly qualified person, other than a member of the council, to perform the duties of the office.

APPROVAL OF CITY OF BOULDER TRANSIT PROGRAM TITLE VI PLAN

CITY OF BOULDER



City Manager

ATTEST:



City Clerk

APPROVED AS TO FORM:



12-10-2021

City Attorney's Office