



City of Fresno Department of Transportation Fresno Area Express (FAX) 2022 Title VI Program

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INTRODUCTION

Fresno Area Express (FAX) is pleased to present its triennial Title VI Program submission covering the period from July 1, 2019 to June 30, 2022 to the Federal Transit Administration (FTA) Office of Civil Rights. FAX is a substantial provider of fixed-route and paratransit services in Central California. As the City of Fresno's Transportation Department, FAX provides more than 10 million annual passenger trips (pre-COVID), the majority of which are provided directly to minority and disadvantaged individuals.

This Title VI Program reviews the practices and operations of FAX for compliance with Title VI of the Civil Rights Act of 1964. This Program update has been prepared in accordance with the FTA circular 4702.1B dated October 1, 2012. Title VI of the Civil Rights Act states the following:

“No person in the United States shall, on the grounds of race, color, or national origin, shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

It is with this statement in mind that FAX serves the residents of Fresno.

The City of Fresno/FAX 2022 Title VI Program consists of two sections. The first section, General Reporting Requirements, contains information concerning Title VI assurances; Title VI Program requirements for FAX; notification of protections afforded by Title VI; Title VI complaint procedures and form; active complaints, investigations, and lawsuits; public participation; and meaningful access for Limited-English Proficiency (LEP) persons.

The second section, Program-Specific Requirements, contains information regarding requirements to submit a Title VI Program as a fixed-route transit provider; the Title VI internal review process for service standards and policies; the requirements to collect and report on demographic data; the internal monitoring process for transit service; and the evaluation of service and fare changes with respect to the effect on minority and low-income individuals that are specific to the FAX fixed-route transit system.

While protections afforded by Title VI extend to fixed-route and paratransit customers alike, the second section focuses on fixed-route service due to its nature of operating along defined routes serving a variety of communities. Given that paratransit service is on-demand and serves the entire FAX service area, it does not require the same level of monitoring and evaluation as the fixed-route service.

The appendices contained at the end of the 2022 Title VI Program include a sample page from the FAX schedule guide; a signed FTA Civil Rights Assurance; the FAX fixed-route



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service map; a low-income population distribution map of the Fresno-Clovis Metropolitan Area (FCMA); a population and racial distribution chart of the FCMA; a population distribution of LEP persons; the current membership listing of the Social Service Transportation Advisory Council (SSTAC); summary data specific to the Spring 2022 customer satisfaction surveys; the public notice to transit users of their Title VI rights; the FAX Title VI complaint form to be used when filing a complaint; the FAX Title VI Fare Equity Analysis; the Title VI Program approval by the City of Fresno city council; all Title VI workshop materials relating to the 2022 Title VI Plan update, the FAX Language Assistance Plan (LAP) training materials, and Title VI Program update surveys.

As a supplement to this report, FTA requires a census tract base map of the service area to be provided with overlays depicting fixed-transit routes and minority population figures. This is included as Appendix P, along with the other required demographic maps.

I. GENERAL REPORTING REQUIREMENTS

Title VI General Reporting Requirements include the following:

- A. Annual Title VI Certifications and Assurances
- B. Title VI Program Submission
- C. Notification of Protection to Beneficiaries under Title VI
- D. Title VI Complaint Procedures
- E. A list of all active lawsuits, investigations, and/or complaints alleging discrimination on the basis of race, color, or national origin with respect to service or other transit benefits
- F. Promotion of Inclusive Public Participation
- G. Meaningful Access to LEP Persons
- H. Minority Representation on Planning and Advisory Bodies
- I. Provide Assistance to Subrecipients
- J. Monitoring of Sub-recipients
- K. Determination of Site or Location of Facilities
- L. Request of Additional Information

The sections below contain information that satisfies these requirements where applicable.

A. Annual Title VI Certification and Assurance

In accordance with 49 CFR Section 21.7(a), the City of Fresno/FAX has in the past submitted its annual Title VI assurances via TEAMWEB as part of its annual Certifications and Assurances submission to the FTA. With the implementation of the new grant management system, the 2022 Title VI assurance will be submitted as part of the annual Certifications and Assurances via the Transit Asset Management System (TrAMS). A signed FTA Civil Rights statement assures all of the records and other information required under FTA Circular 4702.1B dated October 1, 2012 is retained at the FAX administration office in Fresno (Appendix B).

B. Title VI Program Submission

In compliance with 49 CFR Section 21.9(b), the City of Fresno/FAX is submitting its triennial Title VI report for the period covering July 1, 2019 to June 30, 2022, to the FTA,

Office of Civil Rights. The program submission includes the following as required by Circular 4702.1B:

1. The City/FAX Title VI notice to the public.
2. Instructions for the public on how to file a Title VI complaint.
3. List of any active Title VI investigations, complaints, and/or lawsuits.
4. FAX public participation plan.
5. FAX language assistance plan.
6. Additional information regarding transit specific requirements.

C. Notification of Protection under Title VI

FAX publishes a schedule guide that is updated two to five times annually. The schedule guide is available onboard all FAX buses and at the Manchester Transit Center (major transfer station). Pages 10 and 11 of the schedule guide contain the Title VI statement in English and Spanish, including FAX contact information for additional information (Appendix A). Bus placards informing passengers of their Title VI public rights (Appendix K) are posted onboard all FAX fixed-route buses. Title VI notification is also posted in the reception areas at the FAX administration office, the Manchester Transit Center, and the Handy Ride paratransit office. In addition, this information is available electronically in more than 100 different languages (via Google Translate) on the City of Fresno's website at:

<https://www.fresno.gov/transportation/fax/title-vi-non-discrimination-policy/>

D. Title VI Complaint Procedures

FAX Title VI Policy

The City of Fresno/FAX is committed to ensuring no individual or organization is excluded from participation in; denied the benefits of its programs, activities, or services; or subject to discrimination on the basis of race, color, or national origin, according to Title VI of the Civil Rights Act of 1964, as amended. To that end, every department, division, and employee of FAX is responsible for carrying out FAX's commitment to non-discrimination.

This includes the following:

- To ensure that the same level and quality of transportation services are provided to all, regardless of race, color, or national origin;
- To promote full and fair participation in transportation decision making; and

- To provide meaningful access to FAX services, programs, and activities by persons with limited English proficiency. FAX management is responsible for providing leadership, direction, and policy to ensure compliance with Title VI.

Complaint Procedure

Any person who believes he or she has been excluded from participation in or denied the benefits of the FAX programs, activities, or services due to discrimination based on race, color, or national origin may file a complaint with FAX within 180 days from the date of the alleged discrimination. The FAX Title VI Complaint Form (Appendix M) is available online in both English and Spanish and must be returned to FAX to begin a Title VI investigation. The form can be downloaded at:

<https://www.fresno.gov/transportation/fax/title-vi-non-discrimination-policy/>.

There are several ways to file a complaint:

- **By mail** – Addressed to Fresno Area Express, Title VI Coordinator, 2223 “G” Street, Fresno, CA 93706;
- **By fax** – Addressed to Title VI Coordinator at (559) 457-1589;
- **By phone** – By calling (559) 621-RIDE (7433) or dialing 711 California Relay Service for assistance filling out the Complaint Form; or
- **In person** – By visiting either the Manchester Transit Center (MTC) at 3590 N. Blackstone Avenue, Fresno, CA 93726 or the FAX Administrative Office at 2223 “G” Street, Fresno, CA 93706.

If an individual needs assistance completing the complaint form by phone or in person, FAX staff is available to help.

Once a complaint is filed, the FAX Title VI Coordinator will record the complaint in the FAX Title VI Complaint Log and in the FAX Complaints Database as a Title VI Complaint. The Coordinator will then notify the Senior Administrative Clerk.

Upon determining that the claim raises a Title VI issue, a Title VI investigation will be undertaken. The Title VI Coordinator will send a letter to the individual to notify the complainant that FAX will investigate the claim, copying the City Attorney’s office for its files and assistance. It is FAX’s intent to communicate with the complainant throughout the Title VI complaint review process, regardless of the outcome of the investigation.

The Title VI Coordinator will work directly with the appropriate supervisor. The Title VI Coordinator and/or the supervisor may interview any individuals named as witnesses and any other individuals who may have information. The Title VI Coordinator and/or supervisor may review relevant documentation. Failure of the complainant to respond to requests for information from the Title VI Coordinator and/or supervisor may result in

closure of the complaint. Staff shall complete their investigation no later than 60 calendar days after the date FAX received the signed Title VI Complaint Form. If more time is required, the Title VI Coordinator shall notify the complainant of the estimated timeframe for completing the review.

If it is found that there is or has been a violation of Title VI, staff will identify immediate remediation for consideration by the Director of Transportation and/or the City Manager. FAX will send a letter via certified mail to the complainant stating the outcome of the investigation. If a violation exists, the complainant will be advised that the appropriate level of action has been undertaken. Additionally, staff may recommend improvements to FAX's processes relative to Title VI, as appropriate. Conversely, if the claim is invalid, in error, or does not represent a Title VI violation, the Title VI Coordinator will send a letter via certified mail to the complainant with their findings.

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

If the claim is not related to Title VI, but instead to other issues, the Title VI Coordinator will send the complaint back to the Senior Administrative Clerk to send it to the appropriate department or FAX division for resolution and will send a letter to the complainant explaining the process. Divisions/Departments that are responsible for the resolution of the claim are responsible to investigate the non-Title VI complaint and respond to the complainant. Although FAX management strives to promptly resolve all complaints, this process will differ depending on the complexity of the complaint, the individuals involved, and other factors.

Title VI Complaint to the U.S. Department of Transportation

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color or national origin may submit a complaint to the U.S. Department of Transportation.

Federal Transit Administration
Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Further information, including the federal complaint form, is available at <https://www.transit.dot.gov>.

E. Active Lawsuits and Complaints

FAX was the recipient of no active investigations, complaints, or lawsuits with respect to Title VI during the period of July 1, 2019, through June 30, 2022. FAX has not received any complaints which allege discrimination on the basis of race, color, or national origin and is not currently involved in any active lawsuits alleging discrimination.

F. Public Participation

Requirement

Recipients must develop a Public Participation Plan, including information about outreach methods to engage minority and LEP persons, as well as a summary of outreach efforts made subsequent to the prior Title VI Program submission.

FAX promotes a proactive approach in reaching out to the public for comments on potential transit issues, such as service or fare changes, construction projects, technology upgrades and additions, and other important decisions affecting the passengers' experience. Transparency in decision-making and open lines of communication ensure all stakeholders in the community have an opportunity to contribute to the process.

This document outlines the public involvement strategies for the general public, as well as those strategies targeted towards minority and LEP populations. It also outlines the efforts to engage other constituencies that are traditionally under-represented, such as persons with disabilities, low-income populations, and those with low literacy skills.

Outreach Philosophy

FAX emphasizes involvement with the public in its planning process and looks for inclusive and collaborative participation in its decision-making. FAX's goal is to make decisions regarding plans, projects, and service and fare changes only after providing opportunities for public comment and input, including for all fare changes regardless of

the amount of increase or decrease (except temporary fare reductions that last six months or less), and for all major service changes (except demonstration services, changes to routes due to natural or catastrophic disasters, short route detours, and special event routing). FAX analyzes any feedback received to mitigate concerns brought forth. All perspectives should be considered, and FAX conducts proactive ongoing outreach, as well as project- and proposal-specific outreach.

FAX has participated and provided information in the following outreach events since its prior Title VI Plan submission:

1. Pop-up tents at heavily-used transit stops.
2. Employer sponsored job, transit, and health fairs.
3. Community events, such as parades and back-to-school events.
4. School presentations.
5. Take-one brochures.
6. Informational signage inside FAX buses, at transit kiosks, and via digital message signs at BRT stations.
7. Web postings and FAX newsletters.
8. Media releases and advertisement in local newspapers.
9. Social media (Facebook, Twitter, and Instagram).
10. Presentations at affordable housing complexes.
11. Print advertisements and other public notices.
12. Car cards.
13. Community meetings.

During the COVID-19 pandemic, which included a significant portion of the period covered by this Title VI Program, some of FAX's typical outreach activities were put on hold or converted to a virtual format due to state and federal health restrictions. FAX continued its public outreach through contactless activities (such as informational signage, digital communications, social media, flyers on buses, information at kiosks, and public notices) throughout the pandemic. As of June 2022, FAX has resumed in-person activities using proper health precautions.

Ongoing Public Engagement

Efforts are made on a regular basis to support clear lines of communication between FAX and local community organizations. Maintaining strong working relationships with local advocacy groups, social service organizations, health agencies, major employers, K-12 schools, four-year universities, community colleges, and local leaders ensures that FAX stays aware of the issues, needs, and priorities of low-income and minority populations throughout the community. A representative excerpt of those groups is provided in Exhibit 1.

Exhibit 1 Public Engagement Contact List

Organization
ACLU Fresno Chapter
Alliant University
Amazon
Bethany Christian Services
Bitwise Industries
BPAC
Building Industry Association
California Avenue Neighborhood, Fresno Housing Authority
California Council of the Blind, Fresno
California Regional Medical Center
California Rural Legal Assistance Foundation
California State University, Fresno Rehabilitation Counseling Program
Caltrans District 6
Catholic Diocese of Fresno
Center for Community Transformation, Fresno Pacific University
Central California Asthma Collaborative
Central California Hispanic Chamber of Commerce
Central California Legal Services
Central Valley Air Quality Coalition
Central Valley Regional Center
Central Valley Community Foundation
Centro Binacional Para el Desarrollo Indígena Oaxaqueño
Centro La Familia Advocacy, Inc.
City of Clovis
City of Fresno
Community and Neighborhood Centers:
Dickey Youth Development Center
Einstein Neighborhood Center
El Dorado Neighborhood Center
Community and Neighborhood Centers (continued):
Fink-White Neighborhood Center
Frank H. Ball Neighborhood Center
Highway City Neighborhood Center
Holmes Neighborhood Center
Lafayette Neighborhood Center
Mary Ella Brown Community Center

Organization
Maxie L. Parks Community Center
Melody Neighborhood Center
Mosqueda Community Center
Pinedale Community Center
Quigley Neighborhood Center
Romaine Neighborhood Center
Sunset Neighborhood Center
Ted C. Wills Community Center
Community Food Bank
Cultiva La Salud
Council on American-Islamic Relations (CAIR)
Court Appointed Special Advocates
Deaf and Hard of Hearing Service Center, Inc.
Department of Rehabilitation
Every Neighborhood Partnership
Fresno Arts Council
Fresno Center for New Americans
Fresno Chamber of Commerce
Fresno Council of Governments
Fresno County Bicycle Coalition
Fresno County Department of Social Services
Fresno County Rural Transit Agency
Fresno Downtown Partnership
Fresno Economic Development Corporation
Fresno Economic Opportunities Commission
Fresno Housing Authority
Fresno Housing Alliance
Fresno Interdenominational Refugee Ministries
Fresno Irrigation Department
Fresno Metro Black Chamber of Commerce
Fresno Metro Ministry
Fresno Regional Workforce Investment Board
Fresno Street Saints
Fresno-Madera Area Agency on Aging (FMAAA)
Greater Fresno Area Chamber of Commerce
Habitat for Humanity
Hope Now for Youth

Organization
Housing Authorities of City and County of Fresno
I Bike Fresno
Jakara Movement
Latino Coalition for a Healthy California
Leadership Counsel for Justice and Accountability
Manchester Transit Center
Proteus, Inc.
Resources for Independence, Central Valley
Saint Rest Economic Development Corporation
School Districts/Higher Education Institutions:
California State University, Fresno
Central Unified School District
Clovis Unified School District
Clovis Community College
Fresno City College
Fresno County Office of Education
Fresno Pacific University
Fresno Unified School District
State Center Community College District
Southeast Fresno Community Economic Development Association
Stone Soup
Tree Fresno
Transform Fresno
United Way of Fresno County
Valley Center for the Blind
West Fresno Family Resource Center
Westside Church of God
Workforce Connections
Yonas Paulos (Advocate for Homeless Veterans)
Youth Organizations:
Boys and Girls Club of Fresno
Building Healthy Communities - Youth Engagement Team
Center for Multicultural Cooperation
Fresno Boys and Men of Color (BMoC)
The kNow Youth Group

In addition to engaging community groups, FAX seeks ongoing feedback from the public. Comments can be submitted at any time throughout the year on the FAX website, social media (Facebook, Twitter, and Instagram), by phone through a live customer service agent or other staff member, or by mail or in-person to the FAX administrative office. The FAX website is updated regularly with information on projects to encourage the public to comment on these proposals. When financially and resource-feasible, FAX seeks information from current and prospective riders through onboard or online surveys. These surveys are usually conducted every two to three years. The data is collected and analyzed for inclusion in the most current service or project plans. The most recent customer surveys for fixed-route transit and Handy Ride paratransit services were conducted in Spring 2022 (Appendices H and I).

FAX regularly takes part in numerous cross-agency committees including the Social Service Technical Advisory Committee (SSTAC) hosted by the Fresno Council of Governments (FCOG). The list of SSTAC representatives is included in Appendix G. This committee participates in the annual Unmet Transit Needs Assessment process and advises the FCOG on other significant public transit activities and issues (including the Coordinated Public Transit-Human Services Transportation Plan). Active participation in this committee by FAX provides an ongoing mechanism for feedback and representative stakeholder input from some of its more disadvantaged residents and residents with disabilities.

Input is also sought through the City of Fresno's Disability Advisory Commission (DAC). The DAC is a seven-member body made up of community leaders appointed by the mayor and approved by the Fresno City Council. Five of the seven members must be persons with disabilities. DAC has met continuously on the second Tuesday of the month, 10 months a year, since 2008. The DAC receives input from citizens on the needs and concerns of the disability community, formulates and recommends solutions to those concerns, and conveys such recommendations to appropriate departments within the City of Fresno. The DAC has a Transportation Subcommittee which is charged with developing solutions and/or alternatives to current transit issues in the FAX fixed-route and paratransit programs. This includes addressing approval/disapproval of ADA certification appeals. Additionally, the Fresno City Council meetings are held a minimum of biweekly and in compliance with the "Open Meeting Laws" of California, Section 54950 *et seq.* of the Government Code. The public is invited to attend and provide input on matters under consideration by the board. FAX is a department within the City of Fresno.

Outreach Regarding Major Service or Fare Changes

When preparing for significant changes to the FAX fare structure or transit service, it is vital to gather input from a broad range of sources and through a variety of methods. No singular means of outreach can effectively gather feedback from all relevant stakeholders. FAX relies on traditional and innovative outreach methods to obtain public input on

service and fare changes, both those that meet the major service change threshold as well as those not significant enough to meet the threshold.

Definition of Title VI Major Service Change, Disparate Impact, and Disproportionate Burden Policy

FAX must ensure that there is Title VI consideration whenever there is a change in fares or a change in service that could affect minority or low-income communities. The purpose of conducting fare and service equity analyses prior to implementing changes is to determine whether the planned changes will have a disparate impact on the basis of race, color, or national origin, or disproportionate burdens on the basis of income. This section summarizes the definitions of major service changes, disparate impacts, and disproportionate burdens as adopted by the Fresno City Council in August 2018 and described in detail in Appendix L (Title VI Major Service Change, Disparate Impact, and Disproportionate Burden Policy).

A. Major Service Change

A Major Service Change adds or removes **25%** or more:

- Revenue miles on any route.
- Revenue hours on any route.

B. Disparate Impact Policy

A disparate impact exists if a major service change requires a minority population to bear adverse effects by **20%** or more than the adverse effects borne by the general population in the affected area.

C. Disproportionate Burden Policy

A disproportionate burden exists if a major service change requires a low-income population to bear adverse effects by **20%** or more than the adverse effects borne by the general population in the affected area.

All FAX outreach and participation efforts are emphasized with a focus on the following:

1. Ensure full and fair participation by all potentially affected communities;
2. Avoid, minimize, or mitigate disproportionately high and adverse effects on minority and low-income populations; and
3. Prevent the denial of, reduction of, or significant delay in receipt of transportation benefits by minority and low-income populations.

FAX continually seeks to involve organizations and individuals who may have potential interest in proposed service and fare changes. FAX consults with organizations and agencies that serve environmental justice populations and seeks populations who may

be affected to voice their opinion. Public input is documented, considered, and incorporated into the decision-making process.

Stakeholder Meetings

FAX seeks to capitalize on existing community resources to gather input and feedback on proposed service and fare changes. FAX meets with stakeholders from public schools, universities, healthcare institutions, social service agencies, and other local groups to better understand their community needs. These community experts often have localized knowledge that can help guide FAX staff when developing proposals for the public.

Pop-Up Meetings at Heavily Used Bus Stops

More recently, FAX has adopted the approach of “going to our passengers” by holding bilingual pop-up tent meetings at the most heavily used bus stops throughout the transit system and, more specifically, along routes where service changes are proposed. Staff sets up a FAX-branded tent and a table with information, comment cards, reduced fare applications, schedule guides, FAX system maps, FAX memorabilia, and water bottles or other goodies. Two to three FAX staff members staff the pop-up events for two to three hours at a time. The pop-up tents are generally set up at a minimum of five locations, and sometimes up to 15 locations, depending upon the level of outreach needed. This has proven to be an effective way to communicate directly and conveniently with a wide range of FAX passengers in both English and Spanish, create visibility, promote goodwill, encourage a collaborative relationship with our customers, and help educate our passengers about near-term changes.

Public Meetings

As an important method of seeking community input, significant planning and preparation is conducted in advance of every public gathering. The following considerations assure minority, low income, and disabled populations can attend and actively take part in the decision-making process with respect to potential service and fare changes:

- **Location:** Public meetings are scheduled in locations with transit access near the routes or communities affected by the proposed changes, with added considerations for members of the population with limited accessibility, such as minority, low-income, and disabled populations. All hosting facilities are fully ADA-accessible, familiar, and convenient to the public, including local libraries, community centers, social service organizations, and schools.
- **Time:** Public meetings are scheduled, at a minimum, twice (preferably on two different days) during daytime and evening hours to allow for varied work and school schedules. Start and end times are planned around the nearby transit schedules and hours of operation to encourage participation by transit-dependent individuals.

- **Publicity:** Before major public meetings are held, the following procedures are followed, as appropriate:
 - a. Public meeting notices are posted onboard FAX buses, at major transit centers, and at the FAX administration office.
 - b. Rider Alerts are published on the FAX website.
 - c. Notices are published in newspapers (e.g., *The Advocate*, *The Business Journal*, *Vida en El Valle*, *The Collegian*, and *The FCC Rampage*).
 - d. News releases are sent to the local media.
 - e. All meeting announcements inform the public that auxiliary aids and interpretation services will be provided when requested at a minimum of 72 hours in advance.
 - f. Announcements are made through the FAX newsletter and via social media outlets (e.g., Facebook, Twitter, Instagram, etc.).
 - g. Announcements are made on radio stations, in English and Spanish.
 - h. E-mails are sent to interested stakeholders and groups.
- **Format:** Public meetings follow an informal structure throughout the meeting to allow for dialogue, comments, and questions. Key elements are presented visually through handouts, large print display boards, electronic projection, and presentations. Attendees are free to take part according to their comfort level. Comments can be given verbally or in writing at the time of the meeting or by mail or e-mail at a later date.
- **Accessibility:** Bilingual staff members are in attendance for Spanish interpretation. FAX also accommodates lower literacy skilled populations through clear, concise, and simple language to the greatest degree possible. Auxiliary aids and services, such as translators, sign language interpreters, assistive listening devices, or special seating, are available upon advance request.

Public Participation in Recent Planning Activities

The following is a list of public involvement activities conducted by FAX staff since the last Title VI Program submission. This outreach period covered the time during which the COVID-19 pandemic began, with quarantine orders imposed statewide in March 2020. FAX then held several virtual public outreach events. By summer 2021, FAX staff was back in the community, conducting a combination of in-person and virtual events.

Exhibit 2 FY 2019/2020 Outreach

FY 2020 FAX COMMUNITY ACTIVITIES / OUTREACH EVENTS		
	Date	Organization
1	July 20, 2019	Rest Fest Block Party – Saint Rest Plaza
2	September 17, 2019	Central California Women’s Conference
3	September 21, 2019	Carnival Children’s Festival 2019
4	October 3, 2019	Fresno City College Disability Awareness Day
5	October 8, 2019	Veterans Home In-service presentation
6	October 16, 2019	Central Valley Career Tech Expo 19
7	October 24, 2019	Fresno City Council – 2019 Title VI Program
8	November 11, 2019	Veterans Parade
9	November 16, 2019	Kirk Neighborhood Resource Fair
10	February 4, 2020	African American Student Leadership and College and Career Fair
11	February 10, 2020	Despierta Valle Central TV Interview in Spanish regarding proposed service changes
12	February 10, 2020	Pop-up event at the Blackstone and El Paseo bus stop
13	February 10, 2020	Pop-up event at the El Paseo Shopping Center
14	February 11, 2020	Pop-up event at the Shaw and Brawley bus stop
15	February 12, 2020	Pop-up event at the Blackstone and Shaw bus stop
16	February 12, 2020	Pop-up event at the Manchester Transit Center
17	February 13, 2020	Pop-up event at the Weldon BRT Station near Fresno City College
18	February 19, 2020	Pop-up event at the Cedar and Shaw bus stop
19	February 20, 2020	Pop-up event at the A and B shelters at Courthouse Park
20	February 20, 2020	Pop-up event at the L shelter and Van Ness BRT Stations
21	February 24, 2020	Pop-up event at the Fresno Yosemite International Airport
22	February 25, 2020	Proposed service change workshop – Fresno 93740 – Fresno State – University Center
23	February 25, 2020	Unmet Transit Needs – Public Comment Meeting – Fresno 93740 – Fresno State – University Center
24	February 26, 2020	Unmet Transit Needs – Public Comment Meeting – Clovis 93612 – Clovis Senior Center
25	February 27, 2020	Pop-up event at the Fresno and Pottle bus stop
26	February 29, 2020	Proposed service change workshop – Fresno 93722 – Central Learning Adult School
27	February 29, 2020	Unmet Transit Needs – Public Comment Meeting – Fresno 93722 – Central Learning Adult School
28	March 2, 2020	Proposed service change workshop – Fresno 93706 – Maxie L. Parks Community Center

FY 2020 FAX COMMUNITY ACTIVITIES / OUTREACH EVENTS		
	Date	Organization
29	March 2, 2020	Unmet Transit Needs – Public Comment Meeting – Fresno 93706 – Maxie L. Parks Community Center
30	March 3, 2020	Pop-up event at the Kings Canyon and Cedar BRT Station
31	March 3, 2020	Unmet Transit Needs – Public Comment Meeting – Kerman 93630
32	March 4, 2020	Pop-up event at the Kings Canyon and Chestnut BRT Station
33	March 4, 2020	Unmet Transit Needs – Public Comment Meeting – Fowler 93625
34	March 5, 2020	Pop-up event at the Kings Canyon and Clovis BRT Station
Ongoing Committee Participation		Social Services Transportation Advisory Council (SSTAC)
		City of Fresno Disability Advisory Committee

Exhibit 3 FY 2020/21 Outreach

FY 2021 FAX COMMUNITY ACTIVITIES / OUTREACH EVENTS		
	Date	Organization
1	September 19, 2020	Reopening of FAX Customer Service Office at MTC: Banners at MTC - Blackstone and Mall sides
2	February 26, 2021	Free Fares interview on Univision and a variety of written outreach on six-month free fares pilot project
3	April 16, 2021	ADA Transition Plan report, presentation, and workshop flyer posted to FAX web site
4	April 20, 2021	ADA Transition Plan workshop (virtual), SSTAC Meeting
5	April 28, 2021	ADA Transition Plan workshop (virtual), DAC Meeting
6	June 10, 2021	Advertisement in The Advocate - 2021 Black Grads Issue
7	June 26, 2021	Juneteenth Celebration, Frank H. Ball Park, 93706
Ongoing Committee Participation		
		Social Services Transportation Advisory Council (SSTAC)
		City of Fresno Disability Advisory Commission (DAC)

FY 2022 FAX COMMUNITY ACTIVITIES / OUTREACH EVENTS		
	Date	Organization
1	August 5, 2021	Press Event at FAX Bus Yard: Electric Bus Roll Out at FAX
2	August 6, 2021	Channel 30: City of Fresno to roll out 2 new electric FAX buses
3	August 6, 2021	The Business Journal - Fresno FAX's System to Roll Out Electric Buses
4	August 7, 2021	West Fresno Family Resource Center - 19 th Annual Back to School Health Fair
5	August 8, 2021	Univision Channel 21 - Spanish news story regarding Electric Bus Roll Out
6	August 10, 2021	Disability Advisory Commission: Presentation on New Fare Structure; Outreach Events; Electric Buses
7	August 13, 2021	New Fares Pop-Up Event: Inspiration Park bus stops
8	August 13, 2021	New Fares Pop-Up Event: Riverside-El Paseo bus stop
9	August 13, 2021	New Fares Pop-Up Event: Brawley-Walmart bus stops
10	August 16, 2021	New Fares Pop-Up Event: Walnut-California bus stops
11	August 17, 2021	New Fares Pop-Up Event: Cedar-Ventura BRT Stations
12	August 17, 2021	New Fares Pop-Up Event: Weldon Blackstone BRT Stations
13	August 19, 2021	New Fares Pop-Up Event: Cedar-Shaw bus stops
14	August 23, 2021	New Fares Pop-Up Event: Manchester Transit Center
15	August 24, 2021	New Fares Pop-Up Event: A & B Shelters at Courthouse Park and Van Ness BRT Station,
16	August 24, 2021	New Fares Pop-Up Event: El Paso-Blackstone BRT Stations
17	August 25, 2021	New Fares Pop-Up Event: Shaw-Blackstone BRT Stations
18	August 25, 2021	Live Virtual Workshop, Fresno FAX Facebook and You Tube pages
19	August 26, 2021	New Fares Pop-Up Event: L Shelter at Courthouse Park
20	August 27, 2021	Advertisement in The Advocate: Reinstatement of fares September 1, 2021 and continue to wear masks on buses
21	August 30, 2021	New Fares Pop-Up Event: Clovis-Kings Canyon BRT Stations
22	August 30, 2021	New Fares Pop-Up Event: Chestnut-Kings Canyon BRT Station

FY 2022 FAX COMMUNITY ACTIVITIES / OUTREACH EVENTS		
	Date	Organization
23	September 2, 2021	Central California Blood Bank Event
24	October 15, 2021	Press Event at Water Tower for Free Wi-Fi on BRT-Route 1
25	October 30, 2021	Trunk or Treat event with Parcs & West Fresno Family Resource Center
26	November 11, 2021	Central Valley Veterans Day Parade
27	December 16, 2021	Advertisement in The Advocate: Rte 3 extension, Free WiFi, transfers, 100% electric buses, reduced fares
28	December 22, 2021	Advertisement in La Vida in Spanish: Rte 3 extension, Free WiFi, transfers, 100% electric buses, reduced fares
29	February 2, 2022	2022 Passenger Satisfaction Survey Pop-Up Event: MTC
30	February 3, 2022	2022 Passenger Satisfaction Survey Pop-Up Event: CHP, A and B Shelters
31	February 8, 2022	2022 Passenger Satisfaction Survey Pop-Up Event: Peach BRT Station
32	February 8, 2022	Unmet Transit Needs Workshop, Fresno, Betty Rodriguez Library
33	February 9, 2022	2022 Passenger Satisfaction Survey Pop-Up Event: MTC
34	February 10, 2022	2022 Passenger Satisfaction Survey Pop-Up Event: CHP, L Shelter
35	February 10, 2022	Unmet Transit Needs Workshop, Fresno, Mosqueda Center
36	February 16, 2022	2022 Passenger Satisfaction Survey Pop-Up Event: Weldon BRT Station
37	February 17, 2022	2022 Passenger Satisfaction Survey Pop-Up Event: Cedar and Shaw
38	February 17, 2022	Unmet Transit Needs Workshop, Virtual (3 Virtual Meetings: 9 a.m., 2 p.m., 5:30 p.m.)
39	February 22, 2022	Unmet Transit Needs Workshop, Clovis, Senior Center
40	February 26, 2022	Unmet Transit Needs Workshop, Downtown Fresno
41	February 17, 2022	Advertisement in The Advocate for Black History Month
42	March 8, 2022	"How to Ride the Bus" Community Forum for Afghan Refugees with Bethany Christian Services
43	March 30, 2022	FAX Turns 60 Pop-Up Event: Courthouse Park
44	April 6, 2022	"How to Ride the Bus" PowerPoint Presentations posted to web site in English, Spanish, Punjabi, Hmong, and Farsi

FY 2022 FAX COMMUNITY ACTIVITIES / OUTREACH EVENTS		
	Date	Organization
45	May 9, 2022	Title VI Program Update and Proposed Service Change Workshop - Fresno 93722 - Central High School West
46	May 10, 2022	Title VI Program Update and Proposed Service Change Workshop - Pinedale 93650 - Pinedale Community Center
47	May 10, 2022	Title VI Program Update and Proposed Service Change Workshop - Fresno 93728 - Ted C. Wills Community Center
48	May 10, 2022	Title VI Program Update and Proposed Service Change Workshop - Fresno 93706 - Maxie L. Parks Community Center
49	May 17, 2022	Title VI Program Update and Proposed Service Change Workshop - virtual (Zoom/Facebook)
Ongoing Committee Participation		Social Services Transportation Advisory Council (SSTAC)
		City of Fresno Disability Advisory Commission (DAC)

Ongoing Public Engagement

FAX has continued to work closely with many organizations, community groups, educational institutions, and civic departments to stay current on pertinent local issues. FAX staff has participated in regular cross-agency committee meetings, planning studies, and community workshops. From large-format presentations at regional conferences to one-on-one meetings with local leaders, FAX continues to maintain open communications with the communities it serves.

Passenger Surveys

FAX conducted an onboard customer survey (Appendix H) during the review period to gather information on rider demographics, travel patterns, customer satisfaction, unmet transportation needs, and other useful feedback. This survey was conducted during the ongoing COVID pandemic in Spring 2022. This survey of FAX riders gathered detailed travel information from approximately 900 FAX fixed-route passengers. Origin, boarding, alighting, and destination locations were requested, as well as work hours, frequency of use, method of arrival at bus stop, satisfaction with service, COVID impacts, and other relevant travel and customer satisfaction metrics.

The surveys were available in English and Spanish both onboard the transit vehicles and at key bus stop/transit center locations throughout Fresno. Hmong translation of the survey was also available upon request. The information was gathered for use in service

planning, market analysis, Title VI and Environmental Justice analysis, regional visioning, and other outreach efforts.

A telephone survey of Handy Ride paratransit customers was also conducted in 2022 (Appendix I).

Rider Demographics

Half of respondents (50 percent) were male, and English was the primary language spoken in the home for nearly 9 in 10 (88 percent) respondents. Respondents were primarily Hispanic/Latino (43 percent), African American/Black (15 percent), and White (27 percent).

Just over two-fifths (41 percent) earned an annual household income of less than \$10,000 and another 22 percent earned between \$10,000 and \$19,000 on an annual basis. The median respondent annual household income was \$13,800.

Nearly a third of respondents (32 percent) were between 18 and 34 years of age with another 36 percent recorded as between 35 to 54 years of age. More than 6 in 10 (62 percent) had a high school education or less, while 26 percent had a college degree or higher.

Thirty-nine percent of these respondents were employed full-time (25 percent) or part-time (14 percent), and 17 percent were students (seven percent employed and 10 percent unemployed). Among non-student respondents, 13 percent were unemployed.

Outreach for 2020 Service Changes

In April 2020, FAX released its final report on the service equity analysis for proposed changes to five of its 17 routes, including Routes 12/35, 20, 28, and 45, and the introduction of a new route (Route 3). In February and March 2020, right before the COVID-19 state-imposed mandatory shut-down, FAX held a series of bilingual outreach events, including 14 pop-up events at key bus stops and three public workshops throughout the city, to gauge support and collect input on the proposed route changes. FAX also conducted a rider survey in both English and Spanish asking passengers for their opinions on the proposed service changes and collected information on respondent demographics so results could be considered in a Title VI context, along with census information and demographic information from the 2018 FAX passenger survey. The analysis found that no mitigation measures were necessary because the proposed changes, when examined in context and taken as a whole did not cause any disparate impacts or disproportionate burdens. The Fresno City Council approved the Title VI Service Equity Analysis in May 2020, and the service changes were implemented in multiple phases over the course of this Title VI Program. The full text of the service equity analysis is provided in Appendix Q.

Outreach for Fare Changes

From March 1 to August 31, 2021, FAX implemented free fares to ease the financial burden of the COVID-19 pandemic on transit riders. A comprehensive public information campaign was conducted to inform passengers of the free fares. The Fresno City Council then directed staff to permanently reduce fares after the six-month free fare period with a new fare structure. In August 2021, FAX issued its final report on the fare equity analysis conducted in support of its new fare structure, to be implemented on September 1, 2021. The new fare structure reduced the cost of a base fare from \$1.25 to \$1.00, decreased the cost of passes and reduced fares for seniors 65 and older, disabled, and Medicare cardholders on both fixed route service and Handy Ride, and eliminated costs for veterans/military with proper ID and for children under 12 for them to ride for free. The purpose of the fare equity study was to ensure the reduction in fares following the six-month fare-free period during the COVID-19 pandemic did not result in a disparate impact or disproportionate burden. FAX used fare survey data collected in 2018 as well as public outreach to gauge the impacts of these changes. FAX conducted public outreach throughout August 2021 to inform riders of the fare changes and ask for feedback. A virtual workshop was held on August 25, 2021, at 5 pm on the Fresno FAX Facebook and YouTube pages. In addition, FAX held 14 pop-up events geographically dispersed throughout the 7 council districts and at the highest ridership stops in the FAX system to reach the greatest number of passengers. Both the virtual workshop and the series of pop-up events were held in both English and Spanish with sign-language interpretation at the virtual workshop. In addition to the workshop and pop-up events, FAX undertook an extensive advertising effort in English and Spanish to inform riders about the fare changes and the dates, times, and locations of the outreach events. In conversation with FAX staff at the pop-up events, riders expressed appreciation for the six months of free fares and understood why fares needed to be reinstated. The lower fares, and the decreased prices for 10-day and 31-day passes were popular, with the free fares for active military members and veterans especially popular. Comments received via comment cards were similar, expressing support for the lower fares. In addition to comments on the fare changes, riders also expressed appreciation for FAX service during COVID and for FAX staff supplying information on the fare changes in both English and Spanish.

The fare equity analysis found that there were no impacts that exceeded the 20 percent disparate impact or disproportionate burden thresholds. The Fresno City Council approved the Title VI Fare Equity Analysis in October 2021. The full text of the fare equity analysis is provided in Appendix R.

Outreach regarding this 2022 FAX Title VI Program

Every three years, FAX updates its Title VI Program and conducts public outreach to ask for feedback regarding Title VI issues relating to the transit system; make the public aware of their rights under Title VI, including how to file a Title VI complaint; conduct an analysis of the demographic make-up of its service area; and detail the actions it has taken and/or

will take to prevent discrimination. Prior to submission to the FTA, the FAX Title VI Program must be approved by the City Council, which serves as the governing entity of the transit system.

The outreach specific to the preparation of this 2022 FAX Title VI Program occurred during May 2022 and focused on ensuring meaningful access to FAX services for Limited-English Proficiency (LEP) individuals. These efforts included conducting a bilingual survey sent to 103 community stakeholders throughout the FAX service area as well as FAX front-line staff to assess the manner and frequency in which FAX staff interact with LEP individuals. The results of these surveys supplemented data gathered through the Spring 2022 FAX Bus Customer Satisfaction survey.

Collectively, these three data sources were used to prepare the Four-Factor Analysis required by the U.S. Department of Transportation Policy Guidance to prepare the Language Assistance Plan (LAP), which is included in this 2022 Title VI Program. The LAP details FAX's program for ensuring that appropriate language assistance is provided to persons with limited-English proficiency, and includes a wide range of actions including translation of written vital documents into Spanish; bilingual presentation of written information such as flyers, kiosk displays, advertisements, presentations, and monthly newsletters; real-time interpretation for Spanish, Hmong, and Punjabi callers contacting the FAX customer information phone service; Spanish-language interpretation at public meetings and hearings; and advanced request for additional interpretation including American Sign Language¹ at public meetings.

In addition to the public engagement activities discussed above, the FAX also conducted five public workshops in May 2022 to provide a direct opportunity for public input specifically about the Title VI Update as well as ask questions and/or discuss potential concerns regarding FAX services with qualified FAX staff. The workshops were held both during the day as well as in the evening at locations that were both ADA-accessible as well as transit accessible. The workshops were held at the following locations:

- May 9, 2022: Central High School East (library)
- May 10, 2022: Pinedale Community Center
- May 10, 2022: Ted C. Wills Community Center
- May 10, 2022: Maxie L. Parks Recreational Center
- May 17, 2022: Virtual workshop conducted via Zoom

The workshops were promoted via hard copy flyers sent to the community stakeholder database, flyers posted onboard FAX and Handy Ride vehicles, information posted onto

¹ Interpretation in American Sign Language (ASL) falls under the Americans with Disabilities Act (ADA), not Title VI.

the FAX web site, an article via the FAX newsletter, and via FAX social media channels. Content was provided in English and Spanish.

Workshop attendees were provided with a written summary (available in English and Spanish) and a verbal overview of the Title VI process and initial findings, and provided the opportunity to ask questions and provide feedback. Spanish-language interpretation was available at all workshops. In total, there were four attendees at the four in-person workshops, and two attendees at the virtual workshop.

While the primary goal of the workshops was to provide public feedback specific to the Title VI Program Update, attendees also discussed other topics. Discussion included concerns about the distance between FAX bus stops, lack of shade at FAX bus stops, and problems using the predictive-arrival phone messaging (i.e., ambient noise causes the messaging to cut-out/end). Attendees also expressed concerns about the MyFAXbus app as well as indicating a preference for the Moovit app. Finally, questions on the potential for additional FAX bus service into neighboring Clovis were raised.

In addition to the community workshops, bilingual FAX staff conducted seven information-sharing pop-up events on May 19, 23, 24, and 26, 2022. Bus stop locations were selected to ensure coverage of a wide number of FAX routes.

Following the workshops and pop-up events, the Final Draft version of the Title VI Program was posted on the FAX website for a four-week public review period from July 22 through August 19, 2022, prior to its proposed approval by the Fresno City Council as part of its October 13, 2022 meeting agenda. An e-mail was sent to every person who attended the workshops, to the stakeholders that were asked to fill out the survey, to the FAX e-mail distribution list, to the Mayor's Office of Community Affairs, to all City Council members, and to the City of Fresno Disability Advisory Commission (DAC) Transportation Subcommittee, letting them know of the availability of the Draft Title VI Program for review and comment. FAX also posted social media posts, added information on the front page of the FAX web site, added messages at Manchester Transit Center, posted flyers at the Handy Ride office, and posted information on the Bus Rapid Transit digital message signs at all 52 BRT stations. In addition, FAX delivered a copy for public review to the Fresno County Public Library in downtown Fresno.

Concurrent with outreach for the 2022 FAX Title VI Program update, FAX also conducted outreach about proposed frequency enhancements to Routes 3, 20, and 45, and a proposed extension of Route 45.

G. Meaningful Access to Limited-English Proficiency (LEP) Persons

The Language Assistance Plan, which is incorporated into this Title VI Program further below, is one part of FAX's effort to provide an appropriate level of language assistance to meet the needs of individuals within its service area who are considered to be LEP. LEP individuals are those who have a limited ability to read, write, speak, or understand English. This plan includes a summary of language assistance measures currently provided by FAX as well as future proposed measures.

Background

Title VI of the Civil Rights Act of 1964, as amended, provides 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 be otherwise subjected to discrimination under any program or activity that receives federal financial aid. Title VI regulations have been interpreted to hold that Title VI prohibits actions that have a disproportionate effect on LEP persons because such conduct is a form of national origin discrimination. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," directs each federal agency to examine the services it provides and implement a system by which LEP persons can meaningfully access those services, and to publish guidance for their respective recipients to assist them in meeting their obligations to LEP persons under Title VI.

FAX has prepared the Language Assistance Plan using the "Four-Factor Framework" outlined in the U.S. Department of Transportation Policy Guidance.

Analysis using the Four-Factor Framework

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

Examine Experiences with LEP Individuals

Staff Survey: A survey of front-line FAX staff was conducted in April and May 2022 to assess the type of experiences staff have had with LEP individuals. Fifty-two FAX staff members completed the survey. Of those respondents, 18 were transit operators, 14 were customer service representatives/dispatchers, 12 were supervisor/managers, and 11 reported some other position (respondents were given the opportunity to select more than one role). Both drivers and other public-facing staff reported interacting with multiple LEP individuals in a week. Among the drivers, 20 percent said they interacted with fewer than five LEP individuals a week, 20 percent said they interact with five to ten, and 60 percent said they interact with more than 10. Among the customer service representatives/dispatchers, 40.7 percent said they interact with less than five LEP individuals in a week, while 25.9 percent said five to ten and 25.9 percent said more than 10.

Spanish was the most frequent language encountered (cited by 86.5 percent of respondents), followed by Punjabi (34.6 percent). Other languages cited were Hmong (28.8 percent), Chinese (two respondents), and American Sign Language (ASL)² (one respondent). Most respondents (60 percent) said they have occasional issues communicating with LEP customers. Only 16 percent (eight respondents) cited frequent issues.

Staff members were asked what the most beneficial resources would be to communicate with LEP individuals. Website or app-based visual or live-voice translation services such as Google Translate were cited most frequently (39.6 percent), followed by translation services through call center/dispatch (20.8 percent), and translated service brochures or brochures in multiple languages (14.6 percent).

The most common topic where communication barriers arise is routes and destinations (55.8 percent of respondents), followed by where to get off or when the destination is reached (32.7 percent), how to use the service (26.9 percent), and fares and how to pay (21.2 percent). One respondent said communication about lost and found items can be an issue as well.

Staff suggestions about how FAX could serve the community more effectively included the following Title VI-related comments:

- Find a way to use Google Translate for different language barriers.
- Hire more bilingual drivers.
- Have audio messages of frequently asked questions in multiple languages playing on a loop at bus stations and hubs.
- Add signage in Hmong and Punjabi.
- Offer basic language training for those interested such as Rosetta Stone or Babbel.

Public Meetings: Occasionally Spanish interpretation is requested; however, none of the outreach meetings for the Service Equity Analysis, Fare Equity Analysis, or 2022 Title VI meetings required language translation services³. It is more common to need translation for a single request on service-related issues.

Onboard Survey: FAX conducted an onboard survey in March 2022 that was offered in English and Spanish. Five percent of the survey responses were in Spanish. No requests for the survey in Hmong or Punjabi were received.

² Interpretation in American Sign Language (ASL) falls under the Americans with Disabilities Act (ADA), not Title VI.

³ One participant in the 2022 virtual Title VI meeting requested American Sign Language interpretation, which is covered under the Americans with Disabilities Act (ADA) rather than Title VI. Sign Language interpretation had already been arranged and was provided as part of the meeting.

Identify the Geographic Boundaries of the Area your Agency Serves

The FAX Service Area: The FAX service area is located primarily within the city of Fresno (Appendix C). FAX service extends into Clovis on Route 9 east of Willow Avenue, which is funded by the City of Clovis. An express FAX service via Route 58E to Valley Children's Hospital in Madera is funded by the hospital.

Obtain Census Data on LEP Populations in your Service Area

Nearly 15 percent of persons over the age of five living within the Fresno Urbanized Area do not speak English well or at all, representing 95,458 individuals who are in need of language assistance.

The FTA has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. (This is incorporated into the Title VI regulations.) The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5 percent) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5 percent) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials.⁴

It is important to note that the Safe Harbor Provision applies to those LEP populations that are "likely to be affected or encountered" during the provision of service. Therefore, identification of language groups that appear to fall under the Safe Harbor Provision using census data is only one consideration. The purpose of the Four-Factor Analysis is to determine whether those populations are "likely to be affected or encountered" by FAX. Consequently, not all of the languages initially identified as meeting the Safe Harbor threshold through census data alone will ultimately be identified for written translation of vital documents under Title VI. This will be examined further in Factors 2 and 3.

⁴ FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012, page III-9.

Exhibit 5 Persons Who Speak English Less Than “Very Well” (2020)

Language	Estimate	Percent
Total Population 5 Years and Older in the Fresno Urbanized Area	647,977	100.00%
Speaks Only English	390,472	60.26%
Speak English less than “very well”		
Spanish	61,403	9.48%
Other Asian and Pacific Island Languages	15,246	2.35%
Other Indo-European Languages	9,403	1.45%
Chinese (including Mandarin and Cantonese)	2,579	0.40%
Arabic	1,922	0.30%
Tagalog (including Filipino)	1,798	0.28%
Vietnamese	1,176	0.18%
Other and unspecified languages	660	0.10%
[1] Source: US Census Bureau – 2016-2020 ACS 5-Year Summary File		
[2] The following languages represent languages spoken at home with the ability to speak English less than “very well” by less than 0.10% of the population in the FAX service area: Russian, Polish, or other Slavic languages; Korean; French, Haitian, or Creole; and German or other West Germanic Languages.		
[3] Average % LEP in Fresno Urbanized Area = 14.73%		

Recent changes to the data available through the American Community Survey have made it more difficult to identify potential LEP languages. For the 2020 ACS five-year estimates, Spanish, Vietnamese, Chinese, Tagalog, Arabic, Korean and German are identified individually. All other languages are grouped into three broad categories: Other Asian and Pacific Islander Languages, Other Indo-European Languages, and All Other Languages. These broad categories include the following languages (among others):

- Other Asian and Pacific Islander Languages: Japanese, Hmong, Khmer, Thai, Lao, Samoan, and Hawaiian.
- Other Indo-European Languages: Italian, Portuguese, Greek, Serbo-Croatian, Armenian, Persian/Farsi, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, Telugu, Tamil, and Kannada.
- All Other Languages: Navajo, other native languages of North America, Hebrew, Amharic, Somali, Yoruba, Igbo, Swahili, and Hungarian.

Prior to 2016, the ACS provided a detailed analysis of English proficiency for speakers of individual languages. Beginning in 2016, this data was still available at the state level and for several major metropolitan areas, but not for smaller locations such as Fresno. As a

result, it is necessary to draw on other localized sources (such as English learner data, discussed later in this section) to identify language needs in the service area.

Only Spanish meets the Safe Harbor threshold of five percent of the total population. Nearly 10 percent of persons over the age of five in the Fresno Urbanized Area are Spanish-speakers who speak English less than “very well” and are therefore considered to be LEP. Chinese, Arabic, Tagalog, and Vietnamese are spoken by LEP populations greater than 1,000, but do not comprise more than five percent of the population.

There are significant LEP populations represented by two language groups in the 2016-2020 American Community Survey. These include Other Asian and Pacific Island Languages and Other Indo-European Languages. While neither group comprises five percent of the total population, each is well above 1,000 individuals. As cited above, these groups include languages such as Japanese, Hmong, Khmer, Thai, Lao, Samoan, Hawaiian, Italian, Portuguese, Greek, Serbo-Croatian, Armenian, Persian/Farsi, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, Telugu, Tamil, and Kannada. Based on feedback from FAX staff, the most prevalent languages from these groups appear to be Punjabi and Hmong.

English Learner Data

In addition to the census, data from the California Department of Education’s DataQuest resource (<https://dq.cde.ca.gov/dataquest/>) can be used to identify concentrations of English learners within the FAX service area. In total, Fresno Unified School District identified 14,130 English learners from grades K-12 in the 2021/22 school year. Of those, the vast majority (82.6 percent) speak Spanish. The next most common language is Hmong, with 11.3 percent of English learners. Exhibit 6 shows languages that comprise 0.05 percent or greater of the total number of English learners in the district.

While 2021-2022 data provides a revealing snapshot of English learners in Fresno USD, it is also helpful to look at trends across several years. English learners are considered to be English learners until they are reclassified as proficient in English. As a result, a downward trend in English learners can mean some are achieving proficiency and being reclassified, or alternately leaving the District. An increase in English learners would reflect new English learners moving into the district, which can be indicative of an increasing population of speakers of those languages in the community.

Spanish, which has the greatest number of English learners, had a net decrease of approximately seven percent over the past six years but a net increase of nine percent over the last three years. Hmong experienced a net two percent increase over the past three years, but a net 19 percent decline since 2016-2017. Arabic has seen the steadiest growth, increasing 73 percent in six years and 20 percent in the last three years. Punjabi had a net five percent increase over the last six years but a net 10 percent decrease in the last three years.

Exhibit 6 Fresno Unified School District English Learner Data, 2021-2022

Language	K	1	2	3	4	5	6	7	8	9	10	11	12	Total	Percent
Spanish	1,335	995	1,090	1,180	1,011	924	825	935	841	734	665	596	542	11,673	82.61%
Hmong	143	128	140	183	201	113	124	137	117	88	70	87	72	1,603	11.34%
Arabic	29	21	18	18	25	11	19	7	13	10	5	8	6	190	1.34%
Punjabi	18	18	12	17	7	9	4	6	7	3	3	8	6	118	0.84%
Khmer (Cambodian)	13	8	2	12	10	10	9	14	10	10	4	6	4	112	0.79%
Lao	9	7	12	7	4	13	9	5	9	9	11	8	5	108	0.76%
Mixteco	7	7	6	8	9	8	6	5	4	0	4	2	2	68	0.48%
Other non-English languages	2	6	3	1	5	5	3	2	4	2	1	1	6	41	0.29%
Hindi	6	3	2	5	5	1	3	1	1	1	2	0	3	33	0.23%
Armenian	4	3	2	1	6	1	2	4	2	3	1	2	2	33	0.23%
Vietnamese	2	5	2	3	1	1	1	3	4	0	1	1	1	25	0.18%
Filipino (Pilipino or Tagalog)	0	1	3	1	1	2	2	1	0	2	1	1	1	16	0.11%
Cantonese	2	2	3	2	1	0	0	1	0	1	2	0	0	14	0.10%
Mandarin (Putonghua)	0	0	0	4	3	2	1	0	0	1	1	0	0	12	0.08%
Farsi (Persian)	1	0	1	1	1	1	0	2	0	0	0	2	1	10	0.07%
Somali	0	0	0	0	0	2	1	1	1	0	0	0	3	8	0.06%
Thai	0	0	2	0	0	0	0	1	1	0	1	0	2	7	0.05%
Russian	0	2	1	1	1	2	0	0	0	0	0	0	0	7	0.05%
Urdu	3	3	0	0	1	0	0	0	0	0	0	0	0	7	0.05%

Analyze the Data You Have Collected

The six languages within the FAX service area with more than 1,000 persons who speak English less than very well are Spanish, Other Asian and Pacific Island languages, Other Indo-European languages, Chinese, Arabic, and Tagalog. FAX analyzed census data from the 2016-2020 American Community Survey for each of these nine languages/language categories:

- Spanish: The data identified 61,403 individuals within the FAX service area who speak English less than very well.
- Other Asian and Pacific Island Languages: The data identified 15,246 individuals within the FAX service area who speak English less than very well. The languages included in the category of other Asian and Pacific Islander languages are Japanese, Hmong, Khmer, Thai, Lao, Samoan, and Hawaiian. However, given this is a grouping of languages and no individual languages are identified, there is no way to know whether any of these languages meets the Safe Harbor threshold of 1,000 individuals.
- Other Indo-European Languages: The U.S. Census aggregates multiple languages in the category of "Other Indo-European Languages." The data identified 9,403 individuals within the FAX service area who speak English less than very well. The languages included in the category of other Indic languages are Italian, Portuguese, Greek, Armenian, Persian/Farsi, Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, Telugu, Tamil, and Kannada. However, given this is a grouping of languages and no individual languages are identified, there is no way to know whether any of these languages meets the Safe Harbor threshold of 1,000 individuals.
- Chinese: The data identified 2,579 individuals within the FAX service area who speak English less than very well.
- Arabic: The data identified 1,922 individuals within the FAX service area who speak English less than very well.
- Tagalog: The data identified 1,798 individuals within the FAX service area who speak English less than very well.
- Vietnamese: The data identified 1,176 individuals within the FAX service area who speak English less than very well.

Consistent with the American Community Survey, the English Learner data identified two languages with student populations greater than 1,000: Spanish and Hmong. This is also consistent with the most frequently cited languages among persons with limited English proficiency.

Factor 2: The frequency with which LEP persons come into contact with the program.

Consult Directly with LEP Persons

FAX monitors the frequency with which LEP persons come in contact with the program by periodically reviewing requests for language assistance through calls to customer service, passengers on the bus, attendance at public meetings, and walk-in individuals to the administration office. FAX interacts with Spanish-speaking individuals and provides verbal interpretation and written translation services in Spanish. FAX has provided translation services in Hmong on an as-needed basis. Most recently, there were requests for the Handy Ride application to be provided in Punjabi and for information on fixed-route services in Farsi. The Handy Ride application was translated via Google Translate and reviewed/confirmed by a Punjabi-speaking FAX staff member, and FAX prepared a PowerPoint presentation on how to ride the fixed route bus in multiple languages, including Farsi, with assistance from bilingual members of the Afghan community. The presentation was also translated into Spanish, Hmong, and Punjabi with assistance from professional interpreters.

In addition, FAX conducted an onboard customer survey during the review period to gather information on rider demographics, travel patterns, customer satisfaction, unmet transportation needs, and other useful feedback. The Spring 2022 survey of FAX riders gathered detailed travel information from approximately 900 FAX fixed-route passengers. Origin, boarding, alighting, and destination locations were requested, as well as work hours, frequency of use, method of arrival at bus stop (i.e., park & ride, walk, bike), satisfaction with service, and other relevant travel metrics. Responses are used for general service planning.

The surveys were available in English and Spanish both onboard the transit vehicles and at key bus stop/transit center locations throughout Fresno. Respondents were primarily Hispanic/Latino (43 percent), African American/Black (15 percent), and White (27 percent). For 12 percent of the respondents, English was not the primary language spoken in the home. Eleven percent of respondents spoke Spanish or Spanish Creole as the primary language in their homes, while one percent spoke various Asian languages.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.

Identify Community Organizations

Community organizations and social service agencies potentially serving significant numbers of LEP individuals were identified. FAX provided a stakeholder survey to these organizations during April and May 2022. Those organizations marked with an asterisk (*) provided a response to the survey, and the results are summarized below.

1. ACLU Fresno Chapter
2. Alliant University
3. Bethany Christian Services
4. Bitwise Industries
5. Boys and Girls Club of Fresno
6. BPAC
7. Building Industry Association
8. California Council of the Blind, Fresno
9. California Regional Medical Center
10. California Rural Legal Assistance Foundation
11. California State University, Fresno
12. California State University, Fresno Rehabilitation Counseling Program
13. Caltrans District 6
14. Catholic Diocese of Fresno
15. Center for Community Transformation, Fresno Pacific University
16. Center for Multicultural Cooperation
17. Central California Asthma Collaborative
18. Central California Hispanic Chamber of Commerce
19. Central California Legal Services
20. Central Unified School District*
21. Central Valley Air Quality Coalition
22. Central Valley Regional Center
23. Central Valley Community Foundation
24. Centro Binacional Para el Desarrollo Indígena Oaxaqueño
25. Centro La Familia Advocacy, Inc.
26. City of Clovis
27. City of Fresno
28. Clovis Community College
29. Clovis Transit*
30. Clovis Unified School District
31. Dickey Youth Development Center
32. Diocese of Fresno*
33. Einstein Neighborhood Center
34. El Dorado Neighborhood Center
35. Fink-White Neighborhood Center
36. Frank H. Ball Neighborhood Center
37. Community Food Bank
38. Cultiva La Salud
39. Council on American-Islamic Relations (CAIR)
40. Court Appointed Special Advocates
41. Deaf and Hard of Hearing Service Center, Inc.
42. Department of Rehabilitation
43. Every Neighborhood Partnership*
44. Fresno Arts Council*

45. Fresno Boys and Men of Color (BMoC)
46. Fresno Building Healthy Communities*
47. Fresno Center for New Americans
48. Fresno Chamber of Commerce
49. Fresno City College
50. Fresno Council of Governments
51. Fresno County Bicycle Coalition
52. Fresno County Department of Social Services
53. Fresno County Office of Education
54. Fresno County Rural Transit Agency
55. Fresno Downtown Partnership
56. Fresno Economic Development Corporation
57. Fresno Economic Opportunities Commission
58. Fresno Housing Alliance
59. Fresno Interdenominational Refugee Ministries*
60. Fresno Irrigation Department
61. Fresno-Madera Area Agency on Aging (FMAAA)
62. Fresno Metro Black Chamber of Commerce*
63. Fresno Metro Ministry
64. Fresno Pacific University
65. Fresno Regional Workforce Investment Board
66. Fresno Street Saints
67. Fresno Unified School District
68. Greater Fresno Area Chamber of Commerce
69. Habitat for Humanity
70. Highway City Neighborhood Center
71. Holmes Neighborhood Center
72. Hope Now for Youth
73. Housing Authorities of City and County of Fresno
74. I Bike Fresno
75. Jakara Movement
76. The kNow Youth Group
77. Lafayette Neighborhood Center
78. Latino Coalition for a Healthy California
79. Leadership Counsel for Justice and Accountability*
80. Manchester Transit Center
81. Mary Ella Brown Community Center
82. Melody Neighborhood Center
83. Mosqueda Community Center
84. Pinedale Community Center
85. Proteus, Inc.
86. Quigley Neighborhood Center
87. Resources for Independence, Central Valley
88. Reading and Beyond*

89. Romaine Neighborhood Center
90. Saint Rest Economic Development Corporation
91. Southeast Fresno Community Economic Development Association
92. State Center Community College District
93. Stone Soup
94. Sunset Neighborhood Center
95. Ted C. Wills Community Center
96. Tree Fresno
97. Transform Fresno
98. United Way of Fresno County
99. Valley Center for the Blind
100. West Fresno Family Resource Center*
101. Westside Church of God
102. Workforce Connections
103. Yonas Paulos (Advocate for Homeless Veterans)

Contact Relevant Community Organizations

Organizations and agencies contacted were prioritized based on their apparent level of involvement with LEP individuals. Staff members at representative community organizations were contacted via direct mail or a telephone interview.

The responding organizations provided health services, social services, employment services, and/or educational services, or were representatives of government/business/industry, faith-based organizations, community-based organizations, or non-profit organizations.

Respondents were asked to identify the languages spoken by their customers, clients, members, or employees. Spanish was the most frequently cited (83.3 percent of respondents), followed by Hmong (77.8 percent), Punjabi (44.4 percent), and Chinese (16.7 percent). Other languages cited included Armenian, Arabic, Farsi, Khmer, Lao, Mien, Pashto, Russian, Thai, and Ukrainian.

Stakeholders were also asked to prioritize the languages used within their organization, with number one being the most frequently used and number 6 being the least used. In many cases, only two or three languages were identified. Overall, the order of priority was English, Spanish, Hmong, Punjabi, and Chinese/Other (tied for a rank of five). Lao, Arabic, and Cambodian were most frequently specified under "Other."

Stakeholders were asked how often they experience language barriers at their organization. Twenty-five percent said they "rarely" or "never" experience language barriers. Another 56.3 percent said they "occasionally" experience language barriers. More than 18.8 percent said they "often" experience language barriers.

Stakeholders were asked whether their customers, clients, or members use FAX. Nearly 72 percent said yes, while all other respondents said, “I don’t know.” The 72 percent who indicated “yes” were then asked to estimate what percent of their customers, clients, or members were non-native English speakers⁵. Nearly 55 percent of the stakeholders responded that more than half of their clients are non-native English speakers, as shown below.

- Less than one-quarter non-native English speakers – 18.2 percent
- One-quarter to one-half non-native English speakers – 27.3 percent
- One-half to three-quarters non-native English speakers – 27.3 percent
- More than three-quarters non-native English speakers – 27.3 percent

Stakeholders who indicated their customers, clients, or members use FAX were asked if they were aware of any instances where a language barrier prevented use of public transit services. Nearly 22 percent of those stakeholders said they were aware of such instances. Of those, one indicated significant challenges. One said they were aware of 11 instances in the last 12 months, while the other simply said “many.” Instances included riders getting lost or having trouble on the bus, but not being able to ask the driver for assistance due to a language barrier. Others were unable to travel to a vaccination site because they did not know how to ride the bus due to a language barrier. There were also some anecdotal reports of alleged anti-Asian harassment where the driver would not intervene; however, these do not appear to have been reported so it is impossible to know whether the driver even knew about the harassment. The most frequently cited languages among stakeholders reporting language barriers were Spanish and Hmong, but also included Arabic, Khmer, Lao, Pashto, Punjabi, Russian, and Ukrainian.

Almost 39 percent of respondents said they provided translation services. More than 85 percent provide Spanish translation. Others include Hmong (42.9 percent), Punjabi (28.6 percent), Chinese (14.3 percent), Farsi (14.3 percent), Russian (5.6 percent), Arabic (5.6 percent), Armenian (5.6 percent), Cambodian (5.6 percent), Khmer (5.6 percent), Lao (5.6 percent), Thai (5.6 percent), and Vietnamese (5.6 percent).

When asked to share suggestions as to how FAX could serve the organizations more effectively, Title VI-related comments included the following:

⁵ “Non-native English speaker” refers to individuals for whom English is not their native language. It does not indicate how well a given individual speaks English, nor whether that individual is considered to have limited proficiency in English. The stakeholder survey did not ask stakeholder representatives to determine whether the individuals they serve are LEP, only whether they speak a primary language other than English (which can easily be observed).

- Provide personnel and/or signage in various languages.
- Hire more Hmong-speaking drivers and train drivers on cultural humility.
- Teach drivers basic Spanish.
- Hire staff that reflect the diversity of the city.

It is worth noting that through the mayor's new Office of Community Affairs, FAX has worked collaboratively with local immigrant groups to prepare a "How to Ride the Bus" power point presentation in English and translate it into Spanish, Hmong, Punjabi, and Farsi. FAX is currently working with Ukrainian groups to translate the presentation into Ukrainian. The English and all translated Power Point presentations are posted on the FAX web site.

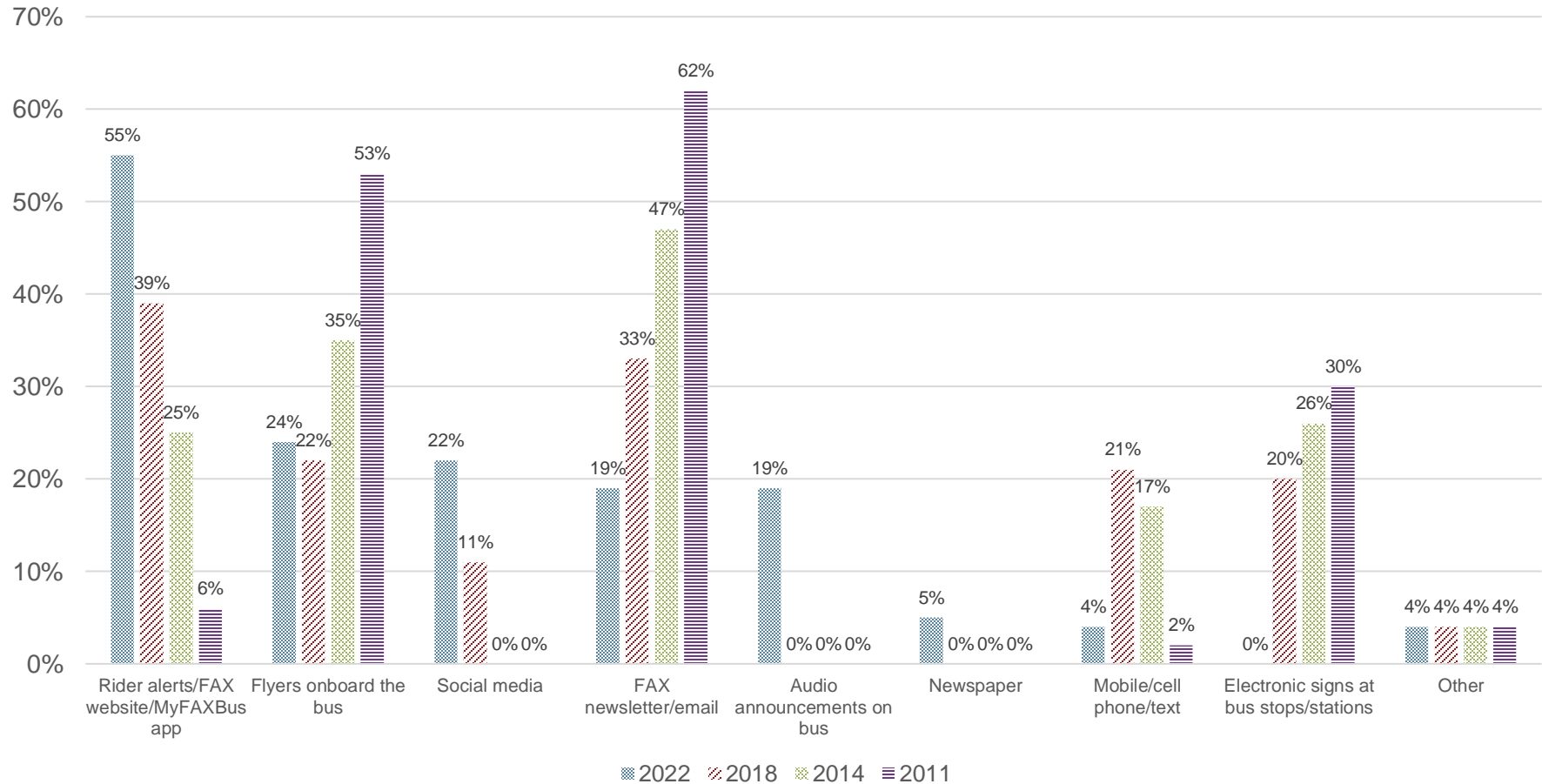
Identify Your Agency's Most Critical Services

Public transportation provides a vital service, allowing passengers to access jobs, medical facilities, shopping, and other necessary programs. Although public transportation does not traditionally provide lifesaving or emergency type access to medical services (such as an ambulance), FAX considers its services to be extremely important and believes it is essential to facilitate fixed-route transit and Handy Ride paratransit usage by all, including those who speak English less than very well.

Critical services are defined by federal DOT guidance as programs or activities that would have serious consequences for individuals if language barriers prevented a person from benefiting from the activity. Serious consequences could include the inability of an LEP individual to effectively utilize public transportation to obtain health care, education, or access to employment. Critical services provided by FAX include:

1. Route and schedule information,
2. Fare media (payment) information,
3. System rules, particularly transfer rules,
4. Information on how to ride the system,
5. Communication related to transit planning and service changes,
6. Information on ADA Paratransit services, and
7. Non-discrimination (Title VI) policy.

Exhibit 7 Preferred Method of Receiving Route, Schedule, and Fare Information



Review Input from Community Organizations and LEP Persons

Input suggests route, schedule, and fare information is the most vital information needed by LEP individuals. Additionally, community organizations would like to see additional information (such as videos on the website or through social media) on how to ride the system, use the ticket machines, etc.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

These are resources available to the FTA grant recipient for LEP outreach, as well as the costs associated with that outreach.

FAX has sixty-four staff members who speak Spanish; eight who speak Hmong, five who speak Punjabi, and one who speaks Cambodian. FAX provides written translation of vital documents, including schedules in Spanish, telephone customer service in Spanish, and Spanish translation at public meetings and hearings. By providing access to services and vital documents in English and Spanish, FAX reaches approximately 94 percent of the population within the FAX service area. FAX provides translation of its website through Google Translate to more than 100 languages including Spanish, Hmong, Laotian, Chinese, Cambodian, Armenian, Tagalog, and Vietnamese. While these may not be “perfect” translations, they do cover a very broad range of languages and can be incredibly useful.

Additionally, FAX strives to present key service information in a format that is easily understandable by LEP individuals. These measures include simple formatting and verbiage for schedules and other sources of passenger information and the use of graphics whenever possible. All FAX bus stops feature the international bus symbol for ease of identification, as well as key stop information in Braille and raised print format.

FAX public-facing staff at the Administration Building and the Customer Service office at Manchester Transit Center are equipped with the federal Census language identification card in order to identify additional language needs.

Exhibit 8 Language Identification Cards

Language Identification Cards Side 2 of 2		Instructions: Place a check by the language spoken <input checked="" type="checkbox"/>
<input type="checkbox"/> Marchi questa casella se legge o parla italiano.		Italian
<input type="checkbox"/> 日本語を話したり、読める場合はここに印を付けてください。		Japanese
<input type="checkbox"/> Mark this box if you read or speak English.		English
<input type="checkbox"/> وضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث بالإنجليزية.		Arabic
<input type="checkbox"/> Ինքնուրույն կերպով կարդա՞ցիք կամ խոսո՞ւք անգլերեն:		Armenian
<input type="checkbox"/> আমি বাংলা বলতে পারি বা বাংলা ভাষায় লিখতে পারি।		Bengali
<input type="checkbox"/> ខ្ញុំអាចអានឬនិយាយអង់គ្លេសបាន។		Cambodian
<input type="checkbox"/> Marka i kahoe yo yangin hantigaf maruini pa/ faniogun kumanta Chamorro.		Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。		Simplified Chinese
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。		Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.		Croatian
<input type="checkbox"/> Zaškrtnite tuto kolonku, pokud čtete a hovoříte česky.		Czech
<input type="checkbox"/> Kreis dit vakje aan als u Nederlands kunt lezen of spreken.		Dutch
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.		Farsi
<input type="checkbox"/> Cochez ici si vous lisez ou parlez le français.		French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.		German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.		Greek
<input type="checkbox"/> Make kanye sa u si ou li oswa ou pale kreyòl ayisyen.		Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएं।		Hindi
<input type="checkbox"/> Kos luh voj no yag koj pash twm thab hais ins Hmong.		Hmong
<input type="checkbox"/> Jelkyje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.		Hungarian

Language Identification Cards Side 1 of 2		Instructions: Place a check by the language spoken <input checked="" type="checkbox"/>
<input type="checkbox"/> Mark this box if you read or speak English.		English
<input type="checkbox"/> وضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث بالإنجليزية.		Arabic
<input type="checkbox"/> Ինքնուրույն կերպով կարդա՞ցիք կամ խոսո՞ւք անգլերեն:		Armenian
<input type="checkbox"/> আমি বাংলা বলতে পারি বা বাংলা ভাষায় লিখতে পারি।		Bengali
<input type="checkbox"/> ខ្ញុំអាចអានឬនិយាយអង់គ្លេសបាន។		Cambodian
<input type="checkbox"/> Marka i kahoe yo yangin hantigaf maruini pa/ faniogun kumanta Chamorro.		Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。		Simplified Chinese
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。		Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.		Croatian
<input type="checkbox"/> Zaškrtnite tuto kolonku, pokud čtete a hovoříte česky.		Czech
<input type="checkbox"/> Kreis dit vakje aan als u Nederlands kunt lezen of spreken.		Dutch
<input type="checkbox"/> اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.		Farsi
<input type="checkbox"/> Cochez ici si vous lisez ou parlez le français.		French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.		German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.		Greek
<input type="checkbox"/> Make kanye sa u si ou li oswa ou pale kreyòl ayisyen.		Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएं।		Hindi
<input type="checkbox"/> Kos luh voj no yag koj pash twm thab hais ins Hmong.		Hmong
<input type="checkbox"/> Jelkyje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.		Hungarian

	Korean
	Laotian
	Marshallese
	Polish
	Portuguese
	Romanian
	Russian
	Serbian
	Slovak
	Spanish
	Tamil
	Telugu
	Thai
	Tongan
	Ukrainian
	Urdu
	Vietnamese
	Yiddish
	Yoruba

Source: Language Identification Placard - 2004 Census Test
U.S. Census Bureau, Economics and Statistics Administration, U.S. Department of Commerce
www.fax.mvhi.gov/2004.pdf

AOC 2012

Determine What, if Any, Additional Services are Needed

FAX has experienced very few direct requests for providing transit service information in languages other than English and Spanish. Where requested FAX has been able to address these requests using City of Fresno staff. The City of Fresno maintains a list of 510 bilingual staff members throughout the City who speak Armenian, Cambodian, Hindi/Punjabi, Hmong, Laotian, Spanish, and American Sign Language. City staff also have access to a third-party telephone interpretation service when additional languages are needed or when bilingual staff are not available. If a driver encounters an individual that requires translation services and they are unable to translate, they are trained to contact a supervisor who will connect the LEP individual to other City staff or third-party interpretation services.

Analyze Your Budget

FAX translates documents to Spanish and provides verbal Spanish translation in-house with staff and will continue to do so. In FY 2022, FAX resources for additional translation services and outreach efforts include \$79,400 budgeted for Public Relations and Information.

Costs of Additional Services

Written translation costs through a professional translator for languages other than Spanish cost approximately \$0.08 to \$0.40 per word or \$30 to \$125 per page, depending on document type and language. Live verbal translation via telephone is approximately \$2.00-\$5.00 per minute, with costs dependent upon frequency of use and languages used.

While the accuracy of web-based platforms such as Google Translate have improved significantly over the years, it should not be used for preparing written translations of documents unless a staff member fluent in that written language is available to review the translation. Professional translators should always be used for creating written translations of vital information and documents.

Consider Cost-Effective Practices for Providing Language Services

Three cost-effective practices for providing language services were included in the prior Title VI Program, all of which have been implemented.

1. Partnering with community organizations to assist with translation or interpretation – FAX has partnered with a group called Jakara Movement that represents a growing Sikh population in West Fresno. In addition, as stated previously in the report, working in collaboration with the mayor's Office of Community Affairs, FAX has worked collaboratively with local immigrant groups to prepare a "How to Ride the Bus" power point presentation in English and translate it into Spanish, Hmong, Punjabi, and Farsi. All versions of the presentation are posted onto the FAX web site.
2. Partnering with community organizations to assist with distribution of printed information to LEP individuals, or to provide educational or outreach opportunities to LEP individuals – FAX has moved forward with this practice and consistently provides materials in Spanish at community events and at its own outreach events.
3. Live verbal translation service for customer service calls in languages other than English and Spanish – this option is currently available to office-based customer service staff and front-line supervisors, either through bilingual staff or a third-party interpretation service.

Results of Four-Factor Analysis

The Four-Factor Analysis showed approximately 15 percent of the population within the FAX service area speaks English less than very well. Spanish is the most commonly used language other than English. The other languages that exceed 1,000 persons represent less than 4.7 percent of the population within the FAX service area. These include Chinese, Arabic, Tagalog, and Vietnamese. An additional nearly 25,000 LEP individuals are represented by two language groups (Other Asian and Pacific Island Languages and Other Indo-European Languages); however, individual languages within those groups (such as Hmong and Punjabi) are not specified.

Based on the 2022 Customer Satisfaction Survey, 88 percent of FAX fixed-route transit passengers speak English; 11 percent speak Spanish; 0.4 percent speak Hmong, and 0.2 percent (each) Lao, Mon-Khmer/Cambodian, or Chinese; and 0.6 percent speak other languages (including Punjabi, Vietnamese, Armenian, and Tagalog).

The Safe Harbor Provision stipulates if a recipient of Federal funding provides written translation of vital documents for each eligible LEP language group that constitutes five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, this action will be considered strong evidence of compliance with the recipient's written translation obligations. The Four-Factor Analysis demonstrated regular, frequent contact with LEP individuals who speak Spanish, but not the same level of contact with those speaking other languages. While Hmong represents a growing LEP population that otherwise meets the Safe Harbor threshold, it has not been demonstrated that there is significant contact with Hmong-speaking LEP individuals by FAX. Therefore, continued translation and distribution of written vital documents in Spanish is required in order to satisfy this provision and ensure FAX services are accessible.

Given the costs and limited resources available, it is not prudent for FAX to invest in formal written translation for a large number of other languages. However, access to online service information in many languages is provided through Google Translate. In addition, providing verbal translation in additional languages by FAX staff will help ensure access, and investing in three-way calling in order to provide access to a broader range of LEP individuals may be warranted.

Based on the outcome of the Four-Factor Analysis, the FAX Language Assistance Plan includes a description of language assistance services provided; notice to LEP persons; a description of staff training; and the procedure for monitoring, evaluating, and updating the Language Assistance Plan in order to ensure meaningful access for LEP individuals to the FAX services.

Language Assistance Plan (LAP)

Based on the results of the Four-Factor Analysis, the Language Assistance Plan (LAP) details FAX's program for ensuring appropriate language assistance is provided to persons with limited English proficiency. Measures currently taken by FAX to provide assistance to LEP individuals are detailed below.

1. Translation of written vital documents in Spanish, including but not limited to, schedules, Title VI forms and notices, complaint form, Handy Ride and Reduced Fare applications, Measure C Taxi Scrip, interior bus car cards regarding fares and passenger rules, and rider alerts.
2. Bilingual (English/Spanish) presentation of information via newspaper advertisements, placards, flyers, kiosk displays, and monthly newsletters.
3. Verbal translation/interpretation to Spanish, Hmong, Punjabi, and other languages for customer calls.
4. Verbal translation/interpretation to Spanish, Hmong, Punjabi, and other languages at public meetings and hearings upon advance request.
5. Translation of website through Google Translate.
6. Simplified transit service information, bus stop signs, and other resources that utilize graphics when feasible.
7. Opportunity for advance requests for other language services, including sign language, at public meetings.
8. Opportunity to accept comments and questions through a number of means, including verbal, written, and electronic comments. FAX makes the public comment period for proposed service changes or other documents as long as possible in order to allow meaningful access for LEP persons. An extended comment period allows LEP individuals to seek clarification and/or assistance from FAX and other resources.

Providing Notice to LEP Persons Regarding the Availability of Language Assistance

FAX publishes schedules, fare information, Title VI notices, passenger rules in the buses, Handy Ride applications, and other key materials in English and Spanish.

Public-facing staff utilize Census Language Identification cards to identify other requested languages. Furthermore, FAX will continue to develop relationships with community organizations in order to notify LEP persons about FAX services and the availability of language assistance.

Notices for all public hearings are published and disseminated through intermediary groups. FAX provides Spanish translation at public meetings and publishes the ability for others to request additional services, such as translation to other languages with advance notice to FAX. Additionally, FAX accepts public comments through a number of avenues including verbal, written, and electronic means. A public comment period is established for all public hearings to provide LEP individuals a meaningful opportunity to comment.

The FAX Title VI policy statement provides information on how to request information in additional languages.

Training

FAX has developed and delivered training for public-facing staff (Appendix T, FAX Language Assistance Plan Instruction) that includes:

1. A summary of responsibilities under the DOT LEP Guidance.
2. A summary of the Language Assistance Plan.
3. A description of the type of language assistance offered by FAX and instructions for accessing these services.
4. Strategies for working effectively with Limited-English Proficient individuals.
5. Cultural sensitivity toward immigrants.

Public-facing staff includes bus operators, supervisors, customer service staff, transit service representatives, paratransit operators, and paratransit eligibility evaluators. Training programs started in April 2022 and will continue annually.

In implementing the training, FAX may make use of additional training resources identified in the DOT LEP Guidance.

Monitoring, Updating, and Evaluating the Language Assistance Plan

At a minimum, the Language Assistance Plan will be evaluated and updated every three years to coincide with submittal of the FAX Title VI Program to the FTA. In the interim, monitoring activities may identify changes that should be made to the Language Assistance Plan. Monitoring activities will include evaluation of the following:

1. Needs identified by public-facing staff during employee training activities related to LEP or in the day-to-day operations of the system.
2. Needs identified by community partners or LEP individuals during outreach activities or other engagement with FAX staff.
3. New data related to LEP populations in the service area.

If evaluation of new information received during monitoring of the plan leads to substantive changes in language assistance policies or practices, the Language Assistance Plan will be updated accordingly.

H. Minority Representation on Planning and Advisory Bodies

Not applicable. Although FAX participates in various planning and advisory bodies, the selection process for membership of those planning and advisory bodies is not determined by the agency.

I. Provide Assistance to Sub-recipients

Not Applicable. FAX is a direct recipient of FTA funds, as well as a subrecipient from the local metropolitan planning agency. FAX has no sub-recipients reporting to it; therefore, it has no obligation to provide assistance.

J. Monitoring of Sub-recipients

Not Applicable. FAX is a direct recipient of FTA funds, as well as a sub-recipient from the local metropolitan planning agency. FAX has no subrecipients reporting to it. Therefore, FAX has no obligation to monitor sub-recipients.

K. Determination of Site or Location of Facilities

Not Applicable. FAX did not acquire or pursue any new sites or facilities during this reporting period.

L. Request of Additional Information from the FTA

FAX has not been asked or directed by the FTA to investigate complaints of discrimination or to resolve concerns about possible non-compliance with the DOT Title VI regulations.

II. PROGRAM-SPECIFIC REQUIREMENTS

This second section contains information regarding the Title VI internal review process for service delivery, the internal monitoring process, the service standard policies, and a description of service changes specific to the FAX fixed-route transit system and its impacts on the minority population. This section contains information that satisfies these requirements.

Title VI Program Specific Requirements include the following subsections:

- A. Requirement to Prepare and Submit a Title VI Program
- B. Requirement to Set System-wide Service Standards
- C. Requirement to Set System-wide Service Policies
- D. Requirement to Collect Demographic Data
- E. Requirement to Monitor Transit Service
- F. Quality of Service Methodology
- G. Requirement to Evaluate Service and Fare Changes

A. Requirement to Prepare and Submit a Title VI Program

In compliance with 49 CFR Section 21.9(b), Fresno Area Express hereby submits its triennial Title VI Report. This report is being submitted to the FTA, Region 9 Civil Rights Officer. All requirements for the General Reporting, as well as the Program-Specific Requirements, have been achieved.

The Fresno City Council adopted the FAX 2022 Title VI Plan on October 13, 2022 (Appendix N).

B. Requirement to Set System-wide Service Standards

FAX established the following minimum standard policies in order to provide the best possible service to all people within the service area. Considerations include cost effectiveness, vehicle load, vehicle headway, access, bus stop frequency, on-time performance, and the distribution of transit amenities.

All standards are applicable to local fixed-routes and the BRT service.

Maximum Vehicle Load

FAX has established a maximum seat-to-passenger load ratio of 1:1.1, or 110 percent of vehicle capacity. This is the desired load factor; however, due to the financial constraints, FAX frequently exceeds this standard on many of its high-occupancy routes.

Vehicle Headway

Vehicle headway is determined primarily by ridership on the route and is limited by available resources. As a policy, FAX will not establish vehicle headways greater than 60 minutes on any route whenever service is operated.

On-Time Performance

FAX should operate its fixed-route buses to achieve on-time performance 90 percent of the time. A bus is considered on time if it arrives no more than five minutes after the scheduled arrival time. The system average for FY 2021 was 91.7 percent. Routes that consistently fall below the system standard are examined and evaluated internally in order to get the routes back to the standard on-time performance rating.

C. Requirement to Set System-wide Service Policies

Distribution of Transit Amenities

FAX does not operate any rail stations, park and ride lots, escalators, or similar amenities and does not have a policy for the distribution of such amenities. However, FAX does place and maintain bus stop signs at all bus stop locations. Other amenities revolve around bus stop improvements, such as benches, shelters, bus bays, and major transfer centers. The determination of how bus stops are improved is limited by financial resources, site specific considerations, accessibility to persons with disabilities, vehicle operating safety, and passenger volume. These standards are published in the FAX Transit Facilities and Development Standards document and are made available to planning agencies and developers upon request. In 2022, FAX worked with the City of Fresno Public Works Department to develop a new bus stop standard providing specifications for street infrastructure that provides sufficient space for placement of amenities and ADA compliance in developing areas. Construction of street infrastructure, such as curb cuts, sidewalks, and bus bays, is the direct responsibility of city and county public works and traffic engineering departments as well as developers based on conditions of approval placed onto development proposals. FAX is required to coordinate with the public works and engineering departments when planning for, constructing, and conditioning such improvements.

Service Availability

The FAX fixed-route bus system should be designed such that a minimum of 85 percent of the service area population resides within one-half mile of a bus route.

Vehicle Assignment

Vehicle assignments are made based on need criteria as follows:

1. Higher-capacity buses are assigned to the heaviest loading coach runs first.
2. Some routes must have smaller vehicles due to maneuvering considerations.
3. All other considerations are demand-driven to allow the best possible service to FAX riders.

Transit Security

FAX customers value safety and security when using the transit system. To address these concerns, FAX has developed a Public Transit Agency Safety Plan (PTASP), the most recent revision of which was adopted by the Fresno City Council in 2022. The PTASP provides for a highly visible security presence for customers and employees, and also details safety performance targets, risk management, and safety and security program promotion. To meet security goals, FAX utilizes uniformed police officers through a contractual arrangement with Fresno PD to deliver system-wide protection, including along the BRT corridor.

All FAX buses have digital video systems on-board. It is believed the presence of the video surveillance cameras serves as a deterrent to vandalism and other crimes. In addition, FAX utilized American Recovery and Reinvestment Act of 2009 (ARRA) funds for transit facility security enhancements, including an access control system and base facility video monitoring. Since the 2019 Title VI Program, video surveillance has been upgraded at the Manchester Transit Center and has been installed at Courthouse Park, as well as at 16 major street intersections that oversee bus routes as they cross one another, and at all 52 BRT stations.

D. Requirement to Collect Demographic Data

Demographic and Service Profile Maps and Charts

FAX is utilizing the data collected in the 2016-2020 American Community Survey (ACS), the most recent period for which this level of detail is available. Concurrent with this Title VI update, FAX is proposing service frequency enhancements to Routes 3, 20, and 45; a service extension of Route 45; and new service to the North Pointe Business Park in the southern industrial area of the city. Given that these changes have yet to be finalized, analyzed from a Title VI perspective, and implemented, further discussion will be included as part of the 2025 Title VI Program update.

FAX was able to utilize Geographic Information System (GIS) technology to generate the recommended maps:

1. Base Map – Service area including major streets and highways, fixed transit facilities, and major activity centers (Appendix C).
2. Demographic Maps – These maps have a 3/4-mile service boundary area and shade those census tracts where the percentage of the minority, low-income, and LEP populations in those areas exceed the average for the service area as a whole (Appendices D, E, and F).
3. Census Tract Chart – The chart outlines the data collected in the 2016-2020 ACS as it relates to minority populations. Highlighted rows represent those tracts where the total minority population percentage exceeds the service area average of 68.8 percent (Appendix O).

Survey Information on Customer Demographics and Travel Patterns

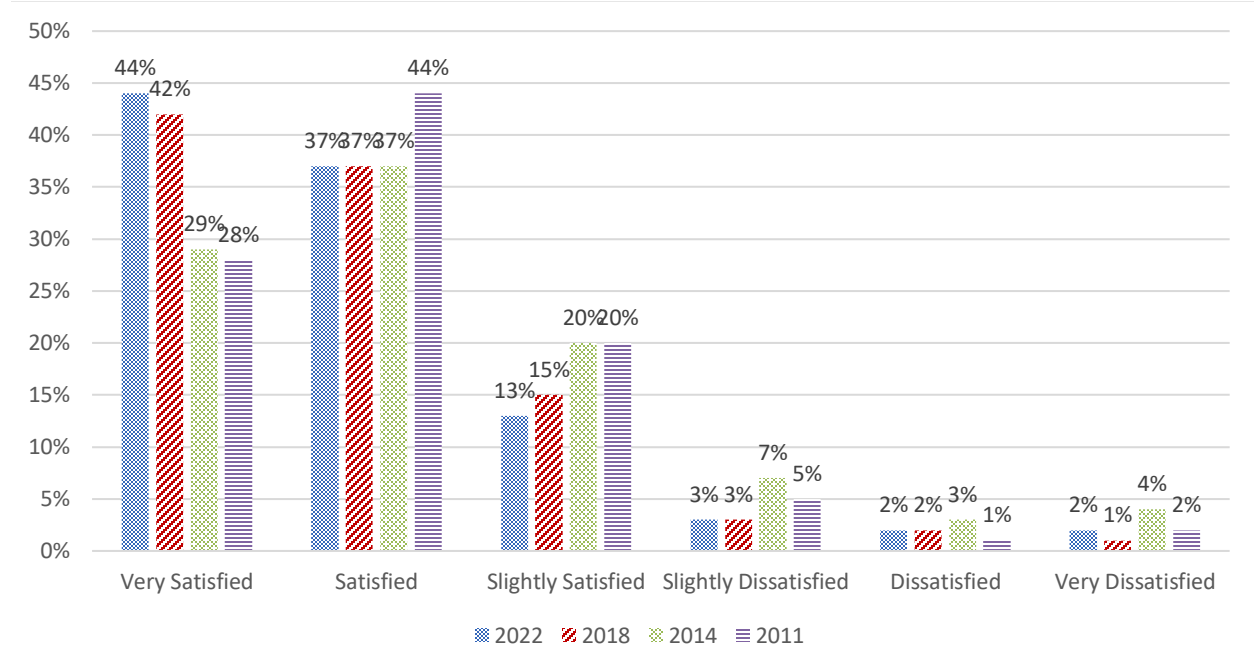
One of the most important elements of the FAX service evaluation process is the passenger survey. These surveys are used to collect information required by federal and state agencies, including passenger demographics, income, origin/destination information, and travel patterns. These surveys are conducted every two to four years. The most recent fixed-route onboard survey was completed in Spring 2022 by Rea and Parker (Appendix H). The survey was available in English and Spanish, and in Hmong upon request. Of the respondents, five percent responded in Spanish, which is consistent with the results of prior surveys. The demographics for this survey are shown in Exhibit 9.

Exhibit 9 Fixed-Route Customer Demographics

Characteristic	2022	2018	2014	2011
Ethnicity				
Hispanic/Latino	43%	47%	46%	38%
African American/Black	15%	22%	18%	28%
White	27%	18%	25%	26%
Asian	4%	3% ¹	6% ²	4%
American Indian/Alaska Native	2%	3%	2%	2%
Pacific Islander	_.3	-	1%	1%
Middle Eastern	_.3	_.3	_.3	1% ⁴
Mixed and Other Ethnicities	10%	7% ⁵	2%	
¹ In 2018, 0.6% identified themselves as Hmong, 0.4% as Filipino, and 0.3% as Cambodian.				
² In 2014, more than one-half (3% of the Asian/SE Asian respondents) indicated they were Hmong and another 1% were Filipino. In 2011, 1% were Filipino and 1.5% identified themselves as Hmong.				
³ Less than 0.5%.				
⁴ Middle Eastern included with Other and Mixed Ethnicities in 2011.				
⁵ 3% were American Indian mixed ethnicities, a plurality of whom were Hispanic and American Indian mixed. 1% were Asian mixed ethnicities.				
Annual Household Income				
Less than \$10,000	34%	54%	57%	33%
\$10,000 - \$19,999	18%	22%	25%	38%
\$20,000 - \$29,999	8%	11%	9%	17%
\$30,000 - \$39,999	7%	5%	5%	9%
\$40,000 - \$49,999	4%	4%	2%	2%
\$50,000 - \$74,999	4%	2%	2%	1%
\$75,000 or more	7%	2%	_.6	_.6
Median Household Income	\$13,800	\$9,300	\$8,700	\$14,500
⁶ These incomes from year-to-year are not directly comparable. In 2011, 33% refused to provide their income; however, in 2018 only 9% refused. In 2014, 14% refused, making the 2018 and 2014 data much less influenced by potential non-response bias. Highest income category provided on 2014 and 2011 surveys was \$50,000 and above. In 2018, there were additional categories for \$50,000 - \$74,999, \$75,000 - \$99,999, and \$100,000 or more.				

FAX fixed-route riders appear to be quite satisfied with the value received for the fare paid. Customers expressed overall satisfaction with the FAX bus system. More than three-quarters (81 percent) are “Very Satisfied” (44 percent) or “Satisfied” (37 percent). On a scale of 1 to 6, where 1 = very satisfied and 6 = very dissatisfied, the mean satisfaction rating is 1.9. This represents a slight improvement over the 2014 and 2011 survey results, where the mean satisfaction ratings were 2.3 and 2.1, respectively.

Exhibit 10 Overall Service Satisfaction



E. Requirement to Monitor Transit Service

Title VI Analysis of Customer Surveys

Fixed-Route Passenger Survey: One of the most important elements of the FAX service evaluation process is the passenger survey. Passenger surveys allow public transit operators to include human aspects of service in the evaluation mix. Measurements of satisfaction, friendliness, and of opinions about services provided are most appropriately collected through customer surveys. Additionally, customer surveys provide an effective way to measure customer expectations, needs, and provide valuable information for quality decision-making.

In conjunction with the Fresno Council of Governments, FAX has hired various firms to conduct detailed customer satisfaction surveys since 1994. These surveys are used to collect information required by federal and state agencies, including passenger demographics, origin/destination information, and travel habits. This data also identifies areas that need improvement and provides FAX with insights into the concerns of its passengers. For example, it was feedback from passenger surveys that allowed FAX to prioritize service improvement options and select late night service (until 1:00 AM) on weekdays in 2017 and provide late night service (till midnight) on Saturdays in 2019. FAX has also developed training programs and procedures to improve customer satisfaction in areas specifically identified by the surveys. The surveys include both telephone and onboard methodologies.

The Spring 2022 fixed-route customer survey consisted of approximately 900 completed survey forms with a margin of error of ± 3.3 percent at a 95 percent confidence level. This survey was conducted during the COVID-19 pandemic. The primary purpose of the surveys was to assess the extent to which FAX customers are satisfied with the service received. Specific areas of inquiry included the following:

- Level of satisfaction with various features of the bus system
- Overall level of satisfaction with the bus system
- Level of importance accorded to various features of the bus system
- Travel characteristics of FAX customers, including:
 - Typical purpose of bus trips
 - Length of time customers have ridden the bus system
 - Number of weekly trips using FAX
 - Use of mobile apps for trip planning
 - Access to a vehicle and reason for using FAX instead of a vehicle that may be available
- Preferences in how customers prefer FAX communicates information to them
- Openness to introduction of an electronic fare payment system
- Demographic characteristics of the respondents

In the 2011, 2014, 2018, and 2022 customer satisfaction reports for FAX, letter grades for FAX performance on the various service characteristics were assigned. These reports assigned grades A, B, C, D, or F (including plus and minus distinctions) based upon the mean ratings provided for each characteristic. The grading scale used in the previous reports, as well as the current report, is depicted in the table below. What emerges from the table is evidence that the FAX system has been a consistent success, with considerable customer satisfaction.

Exhibit 11 Customer Satisfaction Report Card

FAX Customer Satisfaction Report Card and Mean Satisfaction Ratings (Years 2022, 2018, 2014, and 2011)								
Service Characteristic	2022		2018		2014		2011	
	Grade	Mean	Grade	Mean	Grade	Mean	Grade	Mean
Overall Service Provided by FAX Buses	A-	1.88	A-	1.89	B+	2.30	B+	2.12
Value for Price Paid	A-	1.71	A-	1.95	B	2.38	B-	2.70
Drivers' Driving Skills	A-	1.77	A-	1.84	B+	2.14	B+	2.09
Drivers' Safety Awareness	A-	1.80	A-	1.82	B+	2.17	B+	2.06
Accessibility for People with a Disability	A-	1.81						
Audio/Visual Announcement Quality on Bus	A-	1.85						
Drivers' Helpfulness	A-	1.86	A-	1.90	B+	2.17	B+	2.17
FAX Safety During COVID	A-	1.88						
Drivers' Courtesy	A-	1.89	A-	1.98	B	2.44	B+	2.26
Overall Comfort of Bus Rides	A-	1.91	A-	1.99	B	2.42	B+	2.26
Closeness of Bus Stops to Destination	A-	1.93	A-	1.97	B+	2.21	B+	2.28
Closeness of Bus stops to Home	A-	1.94	A-	1.99	B+	2.20	B+	2.30
Availability of Route/Schedule Info	B+	2.00	B+	2.07	B	2.47	B	2.64

FAX Customer Satisfaction Report Card and Mean Satisfaction Ratings (Years 2022, 2018, 2014, and 2011)								
Service Characteristic	2022		2018		2014		2011	
	Grade	Mean	Grade	Mean	Grade	Mean	Grade	Mean
Safety On-Board Buses*	B+	2.03	B+	2.04	B	2.35	A	1.67
Hours of Operation-Weekdays	B+	2.05	B+	2.13	B	2.67	B-	2.93
On-Time Performance	B+	2.14	B+	2.33	B-	2.71	B-	2.71
Time to Complete Trip	B+	2.21	B+	2.27	B-	2.70	B-	2.95
Safety at Bus Stops/Stations*	B+	2.22	B+	2.24	B	2.54	B+	2.05
Frequency of Buses	B+	2.24	B+	2.29	B-	2.83	B-	2.83
Cleanliness Inside Buses	B+	2.25	B	2.37	B-	2.89	B	2.57
Cleanliness of Bus Stops/Stations	B	2.46	B	2.45	B-	2.85	B-	2.80
Hours of Operation-Weekends	B	2.61	B	2.64	C+	3.30	D	4.00
<p>*In 2011, safety questions were asked in a different section of the questionnaire and were on a 4-point scale. The means and percentages have been adjusted but readers are cautioned not to draw significant comparison based upon these differences between 2022, 2018, and 2014 data versus 2011 data.</p>								

Using the Spring 2022 Customer Survey data, a reported 59 percent of respondents are riding the FAX system five or more times per week. Nineteen percent of FAX riders use the service 9-12 times per week, with an additional 13 percent using the system more than 12 times per week. Overall, 34 percent of transit riders are taking at least nine trips per week.

Between 2007 and 2014, the survey allowed individuals to select more than one answer for purpose of trip. However, responses to the 2018 and 2022 survey required respondents to indicate a single response option. The most popular trip purpose in 2022 was work (32 percent) followed by school (21 percent) (combined college and high/middle/elementary school). Errands/personal was next (20 percent) with shopping, medical, recreation, and other finishing up the list. Rider demographics are less reflective of trip purpose findings than in prior years, with 52 percent of all riders interviewed being employed part-time or full-time (or self-employed) and 17 percent of all riders identifying as students.

Exhibit 12 Trip Purposes

Purpose	2022	2018	2014 - Primary Purpose	2014 - Secondary Purpose	2014- Combined Primary and Other Purposes ¹	2011- Combined Primary and Other Purposes ¹
Work/Business	32%	26%	31%	16%	46%	42%
College	12%	19%	23%	8%	30%	30% ²
High/Middle/Elementary School	9%	9%	9%	4%	13%	
Errands/Personal	20%	17%	14%	23%	37%	39%
Shopping	16%	11%	12%	20%	30%	25%
Medical/Dental	7%	8%	7%	11%	18%	17%
Recreational/Social	2%	6%	3%	10%	13%	21%
Other	2%	4%	1%	1%	3%	2%
Make no secondary trip type				7%		

¹ Percentages are of total responses: 2014 = 1,542, 2011 = 1,024. Therefore, sum of percentages is greater than 100%.

² No distinction in 2011 and 2009 for college trips versus other school trips.

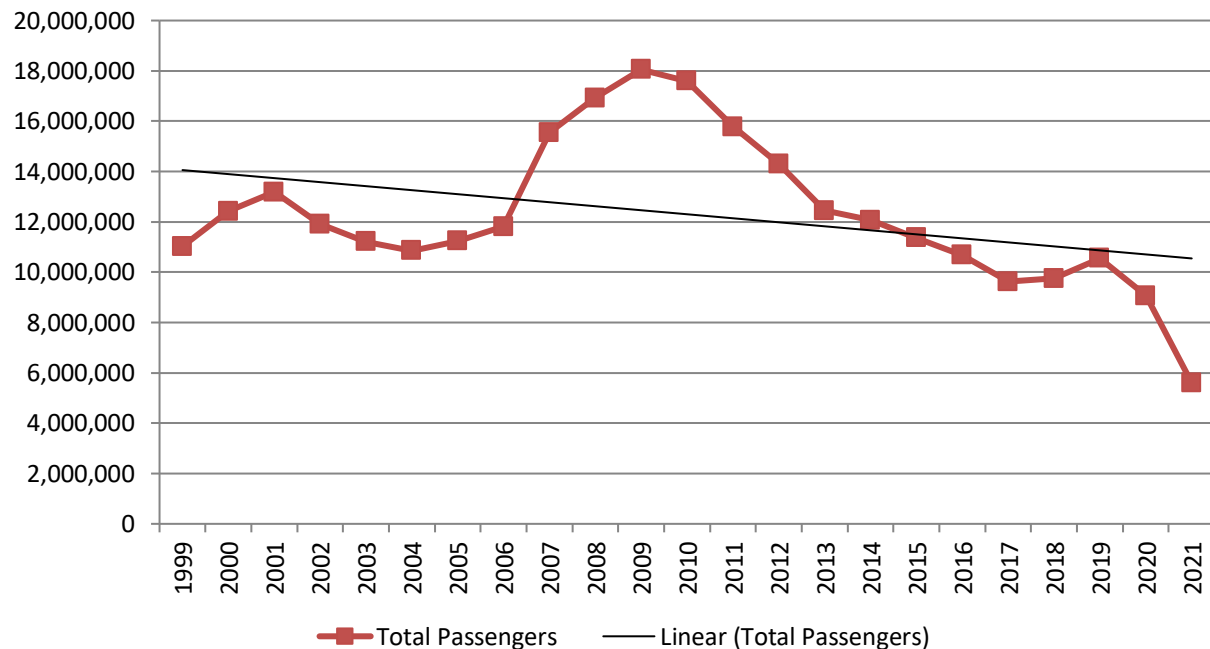
In addition, Hispanic/Latino respondents comprised 43 percent of those surveyed, while Caucasians and African-Americans comprised 27 percent and 15 percent, respectively. Finally, the gender split of the riders interviewed was 50 percent male, 49 percent female, and one percent other. The survey report identified several features considered to be “most important,” including on-time performance, frequency of buses, time to complete

the trip, safety onboard buses, and hours of operation on weekends. 2022 survey findings show overall satisfaction with FAX as a transit provider has increased with a combined score of 81 percent for “Satisfied” or “Very Satisfied” and add in “Slightly Satisfied” for an overall approval of 94 percent. Seventy percent of riders do not have transportation alternatives for work or school. The fact FAX riders tend to be low-income and ethnic minorities serves to underscore the importance of FAX service.

FAX Fixed Route Annual Ridership FY 1999-FY 2021

Annual ridership on FAX bus routes has steadily decreased since its peak in 2009. FY 2018 was the first-time ridership increased since FY 2009, only to decrease dramatically in FY 2020 and FY 2021 as a result of the COVID-19 pandemic. Overall, in the 22-year time period from 1999 to 2021, FAX ridership has decreased a net 54.9 percent, from 12,419,412 riders in FY 1999 to 5,604,778 riders in FY 2021.

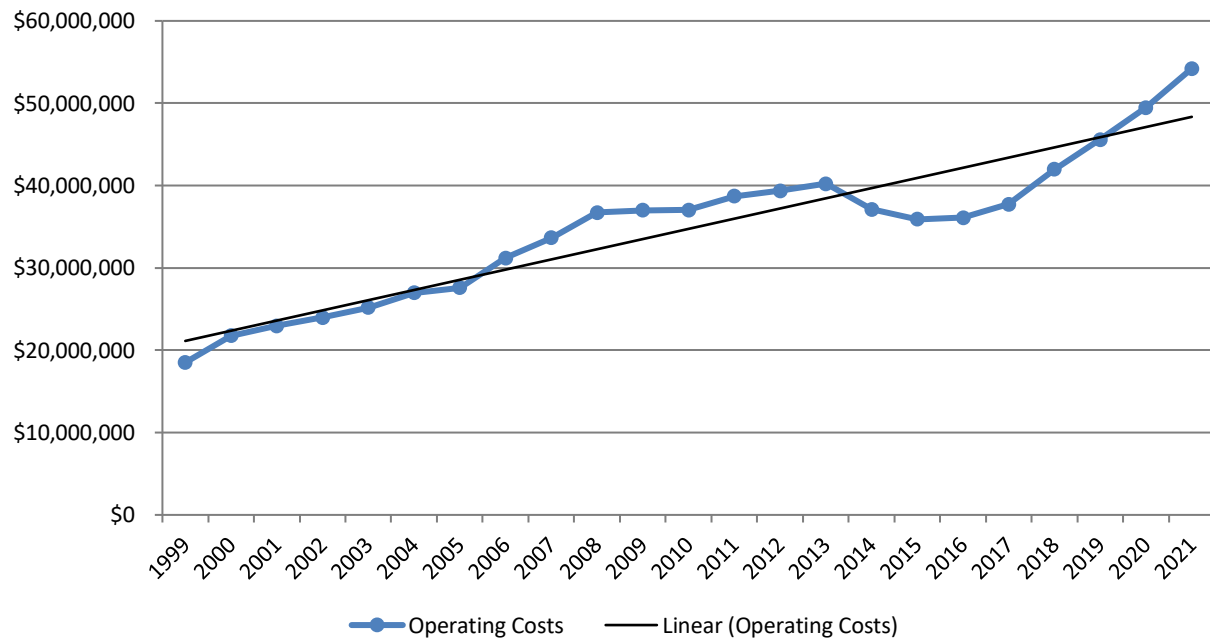
Exhibit 13 Total Ridership, 1999-2021



FAX Fixed-Route Annual Operating Costs FY 1999 – FY 2021

The figure below illustrates how annual operating costs for the FAX system have steadily increased year after year, from \$18.5 million in FY 1999 to more than \$54 million in FY 2021. This represents a 192 percent net increase in costs over a 22-year period. Operating costs did decline slightly in 2014 and 2015, but have risen in the years since.

Exhibit 14 Total Operating Costs, 1999-2022

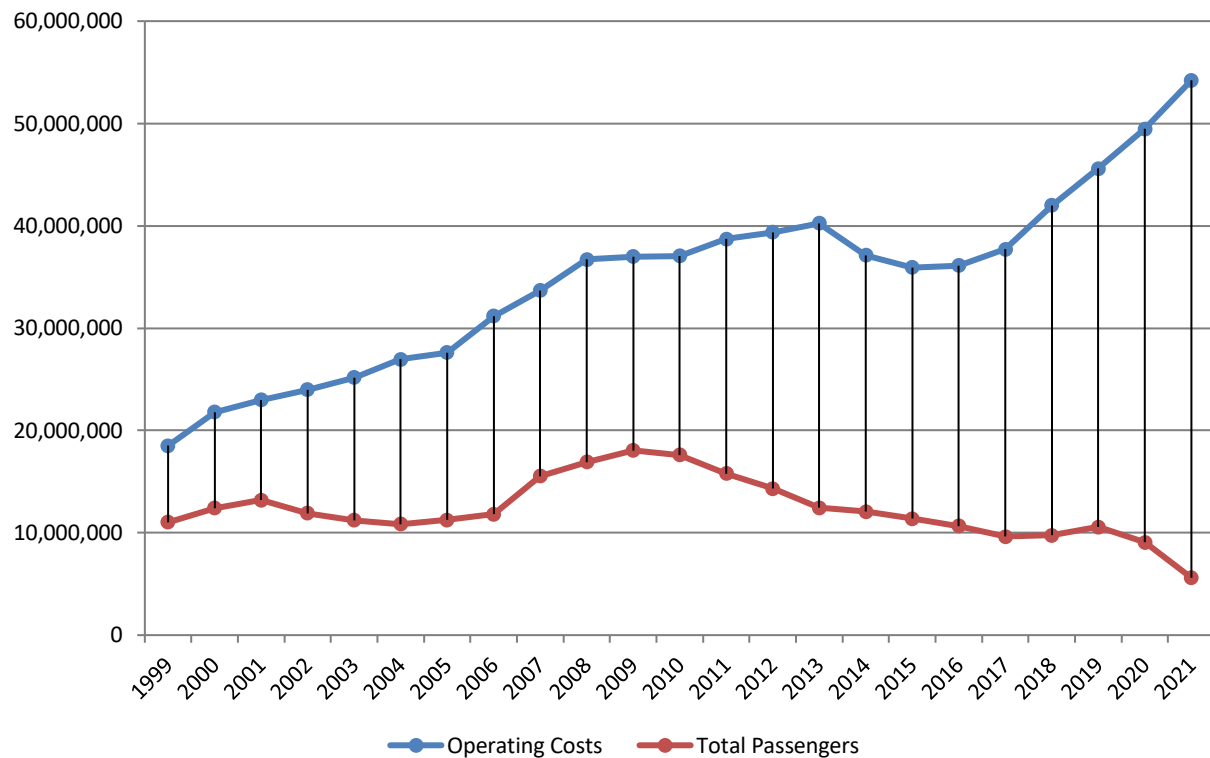


FAX Comparison of Ridership vs. Operating Costs from FY 1999 to FY 2021

The figure below illustrates that ridership, since the economic downturn, has fallen and operating costs have fluctuated. During the most challenging years of the economic downturn (2006 to 2010), ridership was trending up, and operating costs were steadily increasing. Historically, there has been no money being set aside for reserves. In 2011, a reduction in service and a fare increase were needed in order to keep core services operating in the City of Fresno. These actions created a very tight operation, with increased crowding on the peak-hour bus routes and increasing numbers of riders left behind at the bus stops because there was no room for them on the bus. Having learned from these lessons, FAX instituted an operating reserve to provide necessary funding to keep services operating during slower economic times.

In 2020 and 2021, operating costs continued to increase as ridership declined due to the COVID-19 pandemic.

Exhibit 15 Ridership vs. Operating Costs, 1999-2021



Handy Ride: Handy Ride offers demand-responsive, curb-to-curb service seven days a week during the same hours as the fixed-route service. The Handy Ride service area is somewhat larger than the fixed-route area. Reservations for ADA-certified individuals are accepted during normal business hours the day before the desired trip.

Since January 2021, National Express Transit (NEXT) has been providing paratransit services for the City of Fresno. The FAX Administration Division is responsible for directly overseeing the administration of the Handy Ride contract and assuring full compliance with the requirements set forth by the 1990 Americans with Disabilities Act (ADA).

FAX continues to closely monitor Handy Ride service in order to assure compliance with the city contract and ADA. Handy Ride ridership increased from 213,026 passenger rides in FY 2018 to 220,351 in FY 2019, then decreased to 170,721 in FY 2020 and 96,478 in FY 2021, as a result of the COVID-19 pandemic.

Exhibit 16 Handy Ride Annual Mileage and Ridership

Fiscal Year	Vehicle Miles	% Change	Total Pass.	% Change	Miles/Pass.
1999	687,902	8.2%	97,566	1.6%	7.0
2000	773,874	12.5%	95,603	-2.0%	8.0
2001	868,861	12.2%	100,832	5.4%	8.6
2002	920,744	5.9%	102,976	2.1%	8.9
2003	1,011,081	16.9%	133,483	29.6%	7.5
2004	1,182,065	5.9%	169,898	27.0%	6.9
2005	1,084,752	-8.2%	192,556	13.3%	5.6
2006	982,540	-10.4%	182,818	-5.3%	5.4
2007	963,836	-1.9%	180,674	-1.2%	5.4
2008	1,172,610	17.8%	222,428	34.0%	5.3
2009	1,119,986	-4.7%	234,423	5.1%	4.8
2010	1,609,206	30.4%	238,707	1.8%	6.7
2011	1,191,892	-35.0%	227,955	4.7%	5.2
2012	1,123,401	-6.1%	209,473	8.8%	5.4
2013	1,094,217	-2.7%	203,999	2.7%	5.4
2014	1,091,972	-0.2%	207,322	1.6%	5.3
2015	1,147,886	4.9%	209,431	1.0%	5.5
2016	1,140,144	-0.7%	201,826	-3.6%	5.6
2017	1,156,767	1.5%	199,948	-0.9%	5.8
2018	1,212,603	4.8%	213,026	6.5%	5.7
2019	1,220,203	0.6%	220,351	3.4%	5.5
2020	928,054	-23.9%	170,721	-22.5%	5.4
2021	622,633	-32.9%	96,478	-43.5%	6.5

Handy Ride Assessment of Service and Rider Needs

In 2022, FAX engaged Rea and Parker Research to conduct a telephone survey of registered Handy Ride customers regarding their satisfaction with various service attributes. The survey, conducted February 12-20, 2022, included a sample of 254 respondents selected at random from a database of 2,768 registered customers who had used the system within the past three years. This sample size yields a margin of error of +/- 5.9 percent at the 95 percent level of confidence. The prior Handy Ride satisfaction study was conducted in 2018.

Survey data indicates Handy Ride customers demonstrate a very high level of satisfaction for the services provided on the system. This high overall satisfaction with the Handy Ride system has been sustained and documented over an 18-year period – since the 2004 Customer Satisfaction Survey.

The Handy Ride performance report card is shown in Exhibit 17. Features of the Handy Ride system are closely correlated to the performance of the drivers. These include driver courtesy, driver driving skills, and driver safety consciousness. Driver courtesy is particularly relevant because it is not only highly satisfactory in the opinion of the customers, but it is also very important to them. Therefore, this is a core feature of Handy Ride that results in the high regard customers have for the system. Features of the Handy Ride system for which improvement would lead to even higher satisfaction ratings include will-call pickups and scheduled on-time pickups.

Exhibit 17 Handy Ride Report Card 2022

Handy Ride Customer Satisfaction Report Card and Mean Satisfaction Ratings (Years 2022, 2018, 2014, and 2011)								
Service Characteristic	2022		2018		2014		2011	
	Grade	Mean	Grade	Mean	Grade	Mean	Grade	Mean
Overall service provided by Handy Ride	A-	1.81	A-	1.73	A-	1.75	A-	1.75
Drivers' traffic safety consciousness	A	1.56	A	1.45	A	1.40	A	1.40
Drivers' driving skills	A	1.60	A	1.57	A	1.39	A	1.39
Reservation staff's implementation of COVID screening	A	1.64						
Drivers' enforcement of COVID procedures	A	1.64						
Value provided by Handy Ride for the fare/price paid	A	1.65	A	1.58	A	1.62	A	1.62
Cleanliness inside Handy Ride vans and sedans	A-	1.70	A	1.53	A	1.46	A	1.46
Reservation staff's courtesy	A-	1.74	A	1.62	A	1.52	A	1.52
Drivers' courtesy	A-	1.76	A	1.52	A	1.39	A	1.39
Handy Ride's reservation policy - 2 days in advance (1 day in 2011)	A-	1.82	A-	1.95	A-	1.68	A-	1.68
Service hours for Handy Ride vans and sedans	A-	1.84	A-	1.72	A-	1.81	A-	1.81
Monday to Sunday 8 am to 5 pm reservation hours	A-	1.84	A-	1.88	A-	1.85	A-	1.85
Availability of information for Handy Ride from FAX	A-	1.88	A-	1.76	A-	1.72	A-	1.72
Reservation staff's accuracy (correct time and location)	A-	1.94	A-	1.86	A-	1.86	A-	1.86

Handy Ride Customer Satisfaction Report Card and Mean Satisfaction Ratings (Years 2022, 2018, 2014, and 2011)								
Service Characteristic	2022		2018		2014		2011	
	Grade	Mean	Grade	Mean	Grade	Mean	Grade	Mean
Comfort of the Handy Ride vans and sedans	A-	1.98	A-	1.72	A	1.63	A	1.63
Getting you home or to your destination on time	B+	2.12	B+	2.07	B+	2.23	A-	1.89
Locations/methods of payment	B+	2.18						
Scheduled pick-ups (5 minutes before to 30 minutes after scheduled time)	B+	2.22	B+	2.25	B+	2.09	B+	2.09
Will-call pick-ups	B	2.41	B	2.51	B	2.57	B+	2.18

F. Quality of Service Methodology

The procedure for examining the quality of service involved selecting a random sampling of ten minority and ten non-minority census tracts and comparing the level and quality of service between the two sets of tracts. All minority and non-minority tracts within the FCMA are listed in Appendix O. The maps in Appendices D, E, F, and P represent the low-income, minority populations, and LEP by census tract. For this report, the randomly selected census tracts were each evaluated for various indicators, including on-time performance, established headway, vehicle load, and the average time needed to travel to selected destinations. Exhibits 18 and 19 compare service characteristics of the sample minority and non-minority census tracts. As illustrated, overall service characteristics tend to favor minority census tracts within the sample. However, it should be noted the overall population densities of the minority tracts are greater than non-minority tracts.

On-time performance measures are not tract-specific but derived from system-wide numbers for the specific routes that operate to or within the sample tract. During FY 2021, routes in minority census tracts performed at 91.7 percent on-time while routes serving non-minority tracts averaged 91.4 percent on-time. Other important characteristics include average load within the specific tract, the average number of routes servicing a specific tract, and population density per acre for the ten randomly selected minority and non-minority census tracts. For minority tracts, the average load is 2.7; for non-minority tracts, the average load is 3.3. Overall, minority tracts have 2.5 routes per tract, and non-minority tracts have 2.0 per tract. The average population density per acre for the ten randomly selected minority census tracts is 10.16, compared to 7.80 for non-minority tracts. The higher average population density per acre along with the lower average load within the tract justifies FAX's continued operation of a higher level of service in these areas in comparison to the service provided to non-minority census tracts.

In addition, approximately one-third of the minority census tracts in the FCMA lie just outside the central city, the hub of the FAX system. These tracts comprise the older communities of Fresno which, over time, have provided minority population groups with low-cost housing in densely developed areas of the city. Residents of these tracts possess the socio-economic characteristics associated with the typical transit rider; most are low-income and often do not have access to an automobile.

Today, FAX continues to address the transportation needs of minority census tract residents. All 18 FAX routes operate to or within one or more of the 82 minority-termed census tracts. Transit service will continue to be greater in these tracts because of the propensity for lower-income populations to utilize public transit. The following tables compare travel times from minority and non-minority census tracts to primary destinations in the FCMA. Travel times were estimated using trip planning software.

As Exhibits 18 through 21 show, the sampled minority census tracts generally have a slight advantage over the non-minority tracts. This is primarily due to greater ridership demands from those areas, explaining the attention to those areas due to the proximity of heavy generators in the more densely populated minority tracts. Lower average and peak loads in the minority tracts can be attributed to more service in those locations, which spread the ridership across more buses/trips.

Most average travel times between the randomly selected minority census tracts and the major trip generators were lower than for non-minority census tracts. The exceptions are California State University, Fresno and River Park Shopping Center. Both locations are in the northern portion of the service area, which may result in the longer travel times from the census tracts selected. Given the random nature of the census tract selection, the travel times presented in Exhibits 20 and 21 represent only a sampling of travel times. Regardless, FAX should continue to be mindful of potential disparities in travel time and work to minimize its impact on minority communities.

Based on the quality of service evaluation and findings, FAX service does not discriminate against minority census tracts within the FCMA.

Exhibit 18 Service Comparison by Census Tract (Minority)

Minority Tracts	FAX Route Number*	Headway (Minutes) Weekdays	Avg. Peak Load In Tract	Avg. Load in Tract	On-Time Performance	Tract Population	Tract Acres	% of Minorities	Population Density
11.00	34 38	20 15	21.0	2.4	92.1%	3,180	896.0	98.5%	3.55
12.02	41	30	13.0	1.4	92.4%	4,331	832.0	97.9%	5.21
14.11	1 22	10 30	11.0	1.3	91.6%	7,329	640.0	79.5%	11.45
29.03	1 22 26 41	10 30 30 30	26.0	3.5	91.9%	3,845	320.0	87.0%	12.02
33.02	34 38 39	20 15 30	30.0	5.5	92.4%	4,650	320.6	78.4%	14.50
38.05	12 35 39	30 30 30	14.2	1.8	92.4%	7,878	576.0	88.0%	13.68
38.07	35 39	30 30	12.0	1.9	90.8%	3,179	1088.0	79.3%	2.92
42.11	20	45	12.0	2.2	89.9%	7,992	576.0	72.6%	13.88
42.12	9 12 20 41	15 30 45 30	16.0	2.6	92.4%	10,810	1152.0	71.2%	9.38
47.04	20 22 41	45 30 30	21.0	3.9	90.8%	4,790	320.0	90.8%	14.97
Average			17.6	2.7	91.7%				

*GIS routes inside and on the boundary line.

Exhibit 19 Service Comparison by Census Tract (Non-Minority)

Non-Minority Tracts	FAX Route Number	Headway (Minutes) Weekdays	Peak Load In Tract	Avg. Load in Tract	On-Time Performance	Tract Population	Tract Acres	% of Minorities	Population Density
22.00	1 22 33 35	10 30 30 30	22.9	3.8	90.7%	3,616	320.0	68.8%	11.30
30.04	22 26 35	30 30 30	14.3	2.2	90.3%	2,094	320.0	68.5%	6.54
42.13	22 41	30 30	22.0	3.4	91.3%	3,326	320.0	53.6%	10.39
43.01	3	45	15.4	3.1	91.5%	4,326	1344.0	32.2%	3.22
44.09	3 26	45 30	14.3	2.6	91.7%	2,857	704.0	52.6%	4.06
44.11	26	30	26.0	1.6	92.0%	1,624	1088.0	32.7%	1.49
49.02	26 45	30 45	24.4	3.9	90.6%	2,261	256.0	64.9%	8.83
54.03	9 34 38	15 20 15	40.0	6.2	92.1%	5,491	320.0	58.1%	17.16
55.07	58	60	10.7	1.8	92.5%	5,559	640.0	52.2%	8.69
56.02	9	15	23.8	4.1	91.9%	5,009	790.4	48.5%	6.34
Average			21.4	3.3	91.4%				

**GIS routes inside and on the boundary line.*

Exhibit 20 Comparison of Travel Times, Minority Census Tracts

Minority Tracts	Major Trip Generators					
	MTC	FCC	CRMC	CSUF	FSC	RPSC
11.00	41	37	24	47	19	62
12.02	49	59	41	57	45	73
14.11	49	46	35	55	32	73
29.03	41	38	32	49	24	65
33.02	19	10	30	23	30	43
38.05	42	36	60	66	57	70
38.07	26	20	38	50	35	54
42.11	51	39	61	52	58	75
42.12	35	41	56	27	53	46
47.04	17	23	31	41	44	47
Average Travel Time 2022	37.0	34.9	40.8	46.7	39.7	60.8

MTC: Manchester Transit Center/Mall
 FCC: Fresno City College
 CRMC: Community Regional Medical Center
 CSUF: California State University, Fresno
 FSC: Fresno Superior Court
 RPSC: River Park Shopping Center

Exhibit 21 Comparison of Travel Times, Non-Minority Census Tracts

Non-Minority Tracts	Major Trip Generators					
	MTC	FCC	CRMC	CSUF	FSC	RPSC
22.00	19	13	28	39	19	36
30.04	39	34	28	44	33	75
42.13	52	51	59	56	53	70
43.01	48	54	65	60	66	36
44.09	32	40	58	45	49	16
44.11	25	31	46	42	43	10
49.02	23	20	38	33	29	25
54.03	25	39	41	4	40	23
55.07	50	56	62	32	60	23
56.02	59	65	85	32	79	55
Average Travel Time 2022	37.2	40.3	51.0	38.7	47.1	36.9

MTC: Manchester Transit Center/Mall
 FCC: Fresno City College
 CRMC: Community Regional Medical Center
 CSUF: California State University, Fresno
 FSC: Fresno Superior Court
 RPSC: River Park Shopping Center

G. Requirement to Evaluate Service and Fare Changes

Locally Developed Evaluation Procedure

Proposed service and fare changes are reviewed by FAX management and the City Manager's office. If the recommended changes are significant, they are also considered by the full Fresno City Council in a public hearing forum, as required by the FTA, and a service or fare equity analysis is completed to ensure that the service change or fare change does not result in *disparate impact* for minority populations or disproportionate burden for low-income populations.

The FTA defines *disparate impact* as referring to "a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate

objectives but with less disproportionate effect on the basis of race, color, or national origin.”⁶

The FTA defines disproportionate burden as referring to “a neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.”⁷

FAX has developed Disparate Impact and Disproportionate Burden policies to be used in evaluating the impact of major service changes and fare/fare media changes. Those policies are:

Major Service Change

A Major Service Change adds or removes **25 percent** or more:

- Revenue miles on any route.
- Revenue hours on any route.
- **Disparate Impact Policy:** A disparate impact exists if a major service change, fare change, or fare media change requires a minority population to bear adverse effects by **20 percent** or more than the adverse effects borne by the general population in the affected area.
- **Disproportionate Burden Policy:** A disproportionate burden exists if a major service change, fare change, or fare media change requires a low-income population to bear adverse effects by **20 percent** or more than the adverse effects borne by the general population in the affected area.

In accordance with FTA regulation, FAX attempts to notify all concerned stakeholder organizations that may be affected by proposed significant service changes of their opportunity to comment on the proposals via public workshops. Notice is placed in local newspapers, both English and Spanish, at key bus stops, transfer locations, and on-board buses. In addition, FAX posts proposed service changes on its website, which is accessible (via Google Translate) in more than 100 different languages, and via social media. FAX has identified English and Spanish as the primary languages for communicating service and/or fare changes. These two languages represent 94.7 percent of the population within the FAX service area. Overall, the average level of LEP in the FAX service area is 14.7 percent.

⁶ FTA Circular 4702.1B, Chap. I-2.

⁷ FTA Circular 4702.1B, Chap. I-2.

The internal review process for capital program decisions is carried out in the monthly executive staff meetings. The members of the executive staff include the division managers of each of the six divisions, the director of transportation, and two assistant directors of transportation. The Fresno City Council has ultimate responsibility for approving these decisions. If the recommended changes are significant, they are also considered by the Fresno City Council in a public hearing forum, as required by the FTA, and the outreach process described above is also used.

Information concerning route changes is presented in a variety of formats in order to provide minority population groups an opportunity to become acquainted with the changes before they are implemented. The methods used may include:

1. Announcements on English and Spanish radio stations.
2. Media releases to English and Spanish newspapers.
3. Route change information displayed onboard buses.
4. Public notices posted at key bus stops and transfer locations.
5. Rider alerts posted on the FAX website.
6. Articles in the FAX newsletter, which is emailed to the email distribution list and posted on the FAX website.
7. Calls requesting route change information, as well as regular route information, can be referred to various staff members.
8. Social media (Facebook, Twitter, and Instagram).
9. Community workshops and pop-up events at heavily-used bus stops.
10. Advertisements in local newspapers.

Transit service information (schedule guides) are printed in English and Spanish. Spanish-speaking staff members are available to assist in providing route, schedule, and fare information at the FAX administration office and Manchester Transit Center. In addition to these services, FAX provides a variety of services for disabled passengers, including large-print materials for the visually impaired and American Sign Language (ASL) interpreters at public meetings upon advance request.

The final decision on service changes rests with the Fresno City Council, an elected body. The composition of the city council's membership cannot be predetermined, as it is subject to outcomes of local elections. However, the Fresno Council of Governments (FCOG), which contracts the planning services for FAX, established the Social Services Transportation Advisory Council (SSTAC) on May 26, 1989, to aid in its review of transit issues with emphasis on the annual identification of transit needs within Fresno County. These transit needs include the needs of transit-dependent and transit-disadvantaged persons, including the elderly, disabled, and persons of limited mobility. The FCOG establishment of this advisory council is consistent with State law (SB 498, Chapter 673, 1987), which mandates both the purpose and minimum membership of this body. (The composition of the SSTAC and a list of current SSTAC members is in Appendix G.)

The purpose of the SSTAC is:

1. To annually participate in the identification of transit needs (Unmet Transit Needs hearing process).
2. To review and recommend appropriate action by the FCOG for a jurisdiction that finds, by resolution, that:
 - a. There are no unmet transit needs.
 - b. There are no unmet transit needs that are reasonable to meet.
 - c. There are unmet transit needs that are reasonable to meet.
3. To advise the FCOG on any other major transit issues, including the Coordinated Public Transit-Human Services Transportation Plan. The SSTAC solicits comments from agencies and individuals who have concerns about unmet transit needs within the county of Fresno during the Unmet Transit Needs Hearing. A public notice announcing the hearing is placed in all Fresno County and Spanish newspapers, and letters requesting comments are sent directly to agencies and individuals who have concerns.

Service Evaluation

There are many methods for evaluating the efficiency and effectiveness of public transportation service. Because each method has unique strengths and weaknesses, FAX employs several service evaluation methods. Among the methods used are peer review analysis, system minimums assessment, and passenger surveys.

Peer Review Analysis

The peer review analysis uses standard service measurement criteria to compare one system performance against another. This kind of analysis is most valuable when standard, well-controlled data sets are available, and when the systems being evaluated have similar operating environments.

The FAX peer review analysis is an automated peer selection process that identifies comparable transit systems. This approach was derived by the Florida Transit Information System (www.ftis.org) and uses a variety of criteria in the selection process. Criteria include Urban Area Population, Vehicle Miles Operated, Operating Budget, Population Density, Service Area Type, Population Growth Rate, Percent Low -Income, and others. The five transit agencies selected were Albuquerque, NM; Bakersfield, CA (GET); Eugene, OR (Lane Transit District); Spokane, WA; and Stockton, CA (RTD). All five agencies are FTA Grant Recipients; therefore, they are required to provide their system performance data to the National Transit Database (NTD). Furthermore, two are California agencies that must operate under the same California State Transportation Development Act Guidelines as FAX. Exhibit 22 provides a system comparison of the five transit agencies and reflects the most recent NTD data available through the FTIS system, which is 2020.

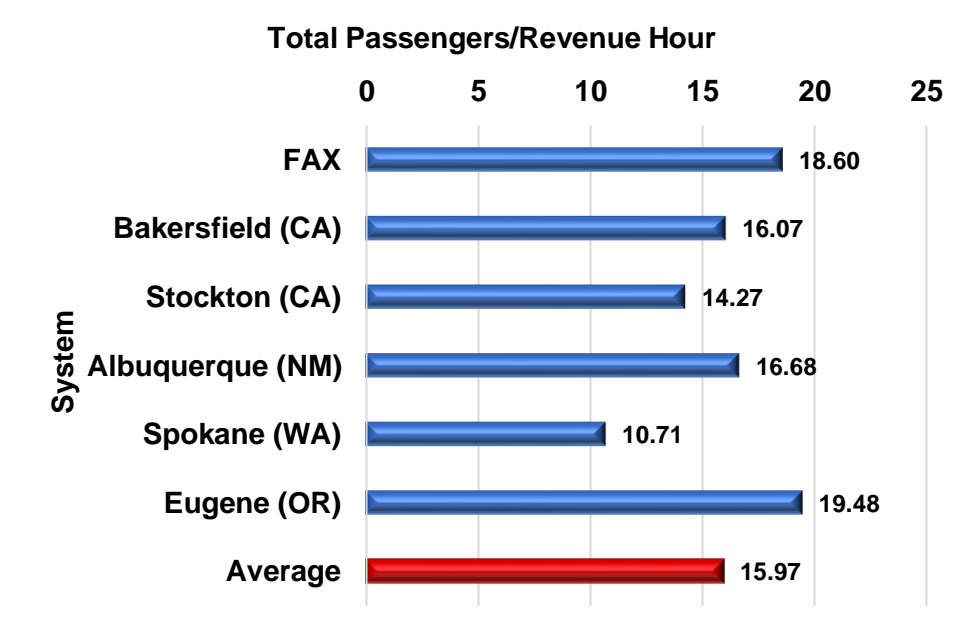
Exhibit 22 System Comparison (2020)

System	Passengers/Hour		Passengers/Mile		Cost/Hour		Cost/Passenger		Farebox Recovery		Score	Rank
	Metric	Rank	Metric	Rank	Metric	Rank	Metric	Rank	Metric	Rank		
FAX	18.60	2	1.64	1	\$114.75	2	\$6.17	2	9.45%	3	2.0	1
Bakersfield (CA)	16.07	4	0.29	6	\$97.20	1	\$6.05	1	14.19%	2	2.8	3
Stockton (CA)	14.27	5	0.95	4	\$174.78	6	\$12.25	6	8.17%	4	5.0	5
Albuquerque (NM)	16.68	3	1.17	3	\$118.95	3	\$7.13	4	5.16%	6	3.8	4
Spokane (WA)	10.71	6	0.73	5	\$125.58	5	\$11.73	5	7.22%	5	5.2	6
Eugene (OR)	19.48	1	1.21	2	\$124.10	4	\$6.37	3	27.19%	1	2.2	2

System Comparison (Cost-effectiveness): FAX places very well among the selected peers in four of the five categories and is ranked first among the selected peers. With an average of 18.60 passengers per hour, 16 percent higher than the peer system average of 15.97, FAX ranked number two in this important productivity indicator.

Exhibit 23 clearly illustrates FAX is operating a highly efficient transit service, carrying nearly three more passengers per hour more than the average of the peer operators.

Exhibit 23 System Comparison: Passengers/Revenue Hour (2020)



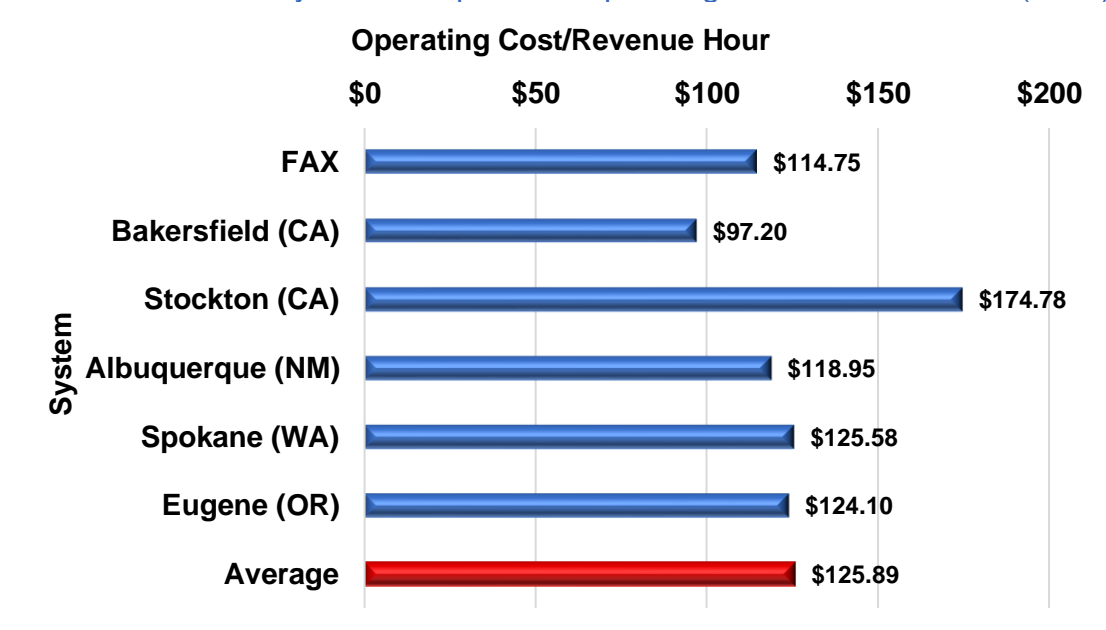
FAX Operating Cost per Revenue Hour Comparison with Peer Operators

At nearly \$115 per hour, FAX is operating below the peer systems average cost per hour and is operating above the cost per hour of just one of the five peer systems. The FAX operating expense per hour is \$114.75, or approximately nine percent less than the peer system average of \$125.89. As shown in Exhibit 24, FAX ranks second in terms of operating expense per hour.

It is important to remember that each of the systems used in this comparative analysis has its own unique set of operating properties that can have significant impacts on various performance measures. The same is true for providing more frequent service. Increasing service frequency from 30 minutes to 15 minutes effectively doubles the number of service hours; however, only in very rare cases would this lead to a doubling of passenger trips. While improved service frequency and longer service hours are important and positive service improvements, they also reduce overall passenger productivity.

Similarly, San Joaquin RTD (Stockton) provides a high level of commuter service to the Bay Area. Commuter services are predominantly composed of long-distance express service. In terms of productivity, commuter services tend to be lower in passengers per hour and mile and higher in cost per passenger. This is certainly reflected in San Joaquin RTD productivity.

Exhibit 24 System Comparison: Operating Cost/Revenue Hour (2020)

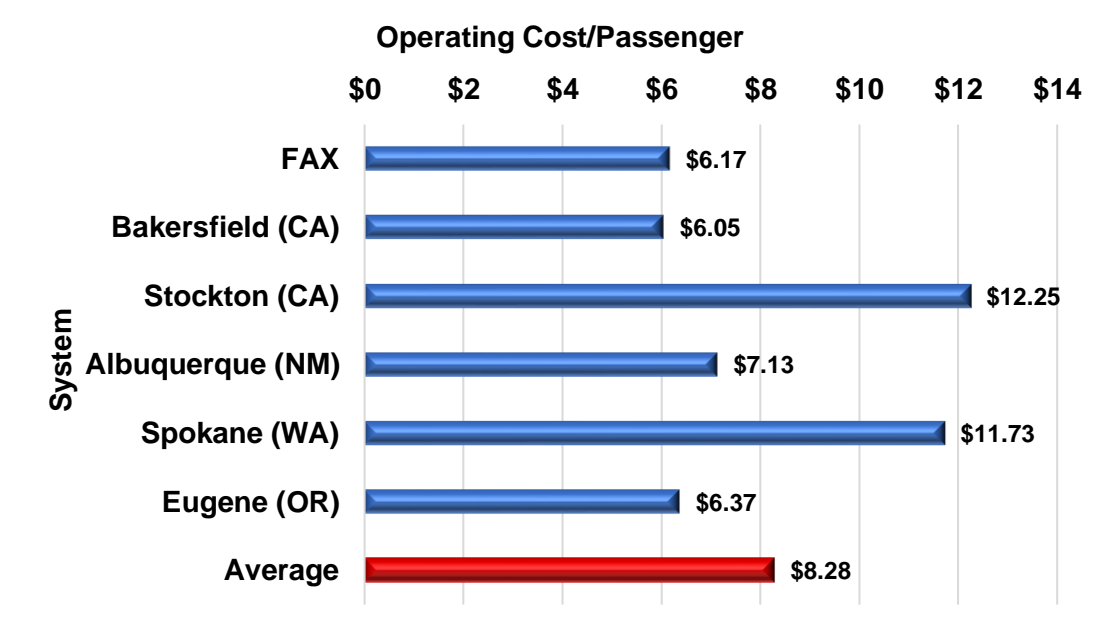


FAX Operating Cost per Passenger Comparison with Peer Operators

FAX operating cost per passenger of \$6.17 is lower than the peer operators' average of \$8.28 and ranks second among the peer operators. FAX operates a very cost-efficient transit service.

As with improved service frequencies and service duration, improvements in passenger amenities and supportive services are positive improvements in customer service; however, these improvements come at a significant cost.

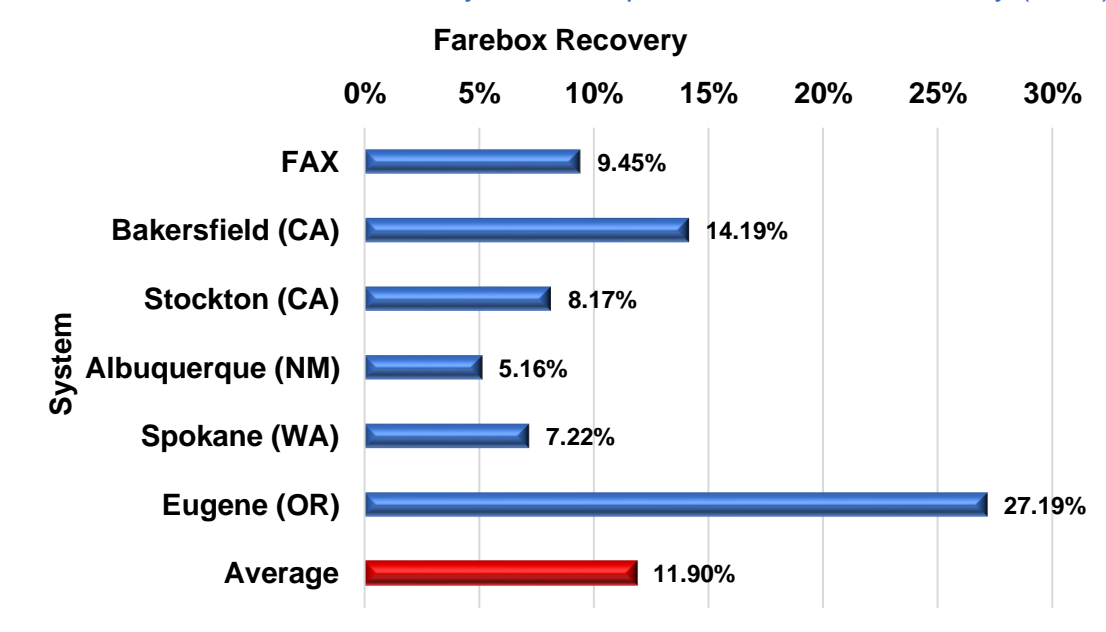
Exhibit 25 System Comparison: Operating Cost/Passenger (2020)



FAX Farebox Recovery Comparison with Peer Operators

The FAX farebox recovery ratio of 9.5 percent was lower than the peer average of 11.9 percent. The State Transportation Development Act (TDA) regulations require FAX to maintain a minimum 20 percent farebox recovery ratio. The data reported to the National Transit Database (NTD) by FAX and all peers (used in the peer analysis) does not necessarily reflect all revenues that can be applied to the farebox recovery ratio under the TDA.

Exhibit 26 System Comparison: Farebox Recovery (2020)



The TDA places restrictions on the use of State Transit Assistance (STA) funds. Regulations require transit agencies to keep cost per hour increases under the State Consumer Price Index (CPI). If cost per hour increases exceed the State CPI, transit agencies are only allowed to use STA funds for capital expenses on a sliding scale. Finally, local and regional concerns are used to develop minimum productivity standards. For FAX, these standards are developed through a coordinated, comprehensive, continuous process carried out by Fresno COG. The Fresno COG Regional Transportation Plan (RTP) and Short-Range Transit Plan for the Fresno Clovis Urbanized Area (SRTP) set guidelines for service evaluation. Additionally, each year Fresno COG prepares the Annual Transit Productivity Analysis. This document assesses all public transit operators in Fresno County and reviews the most recent triennial audit recommendations.

System Minimums Assessment

System minimums assessment uses measurements from the system under evaluation to assess minimum levels of efficiency and effectiveness of its component sub-systems. The strength of this service evaluation method is it makes allowances for unique operating practices and environments. FAX minimum standards are established through legislation and local effort. From a legislative perspective, federal and state regulations require public transit operators to provide and maintain service in some very specific ways.

In 1981, a Transit Corridor Analysis was completed to evaluate the efficiency and effectiveness of service on a route-by-route basis. At the time, service measures were developed to assist in evaluating individual route performance in relation to the system-wide performance. Those minimum performance measures continue to be the basis of local service evaluation.

At a minimum, an individual route should exceed 60 percent of the system-wide average for a number of key indicators. The 60 percent figure is an overall industry standard that assumes a transit system may tolerate some low-performing routes if they provide an important component of the system, especially if the component helps meet the needs of the transit dependent riders. FAX uses several operational indicators to measure the performance and financial status of the system and individual routes. Individual routes should achieve 60 percent of the system average, except for those indicators that measure cost efficiency. Cost performance measures should not exceed 140 percent of the total system average, with 140 percent representing the system maximum. Exhibit 27 shows individual routes and their performance in various categories. Cells in red are those that do not meet the minimum/maximum thresholds for those key indicators.

Exhibit 27 Summary of Key Operation Indicators (FY 2020)

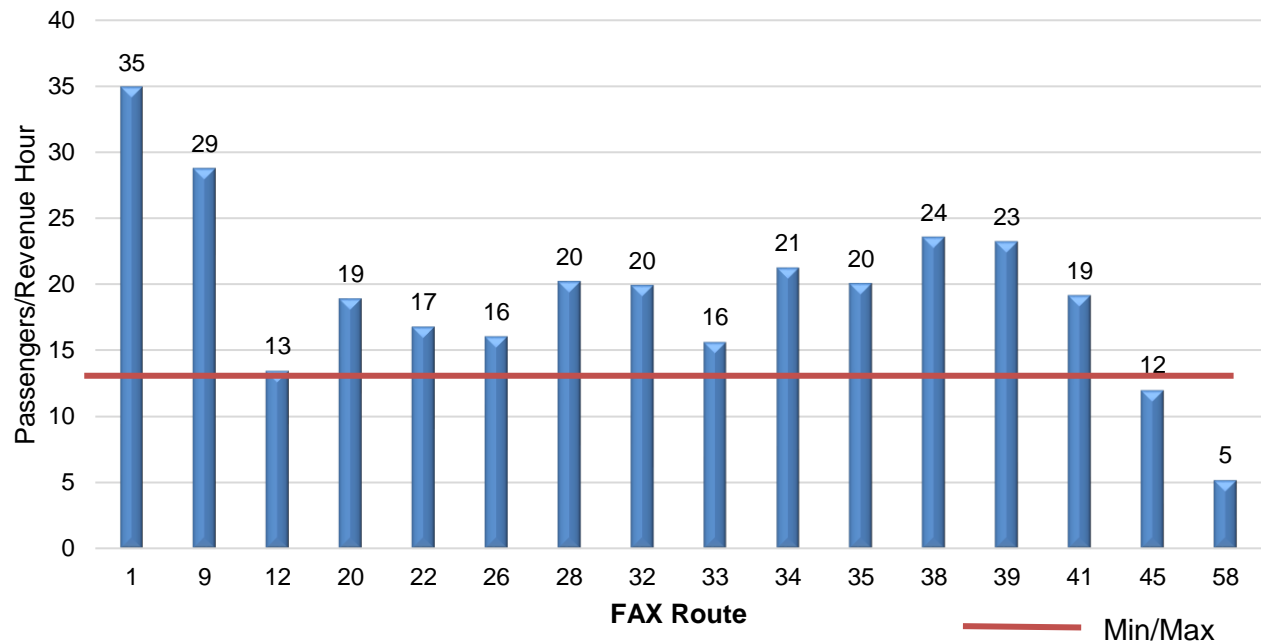
Route	Passengers	Miles	Hours	Farebox	Cost	Pass/ Hour	Pass/ Mile	Cost/ Hour	Cost/ Pass	Fare/ Op. Cost
1	2,284,310	782,719	65,435	\$1,279,214	\$4,769,381	34.91	2.92	\$72.89	\$2.09	26.8%
9	806,530	345,008	28,072	\$451,657	\$2,056,420	28.73	2.34	\$73.26	\$2.55	22.0%
12	189,824	174,661	14,133	\$106,301	\$1,036,400	13.43	1.09	\$73.33	\$5.46	10.3%
20	301,217	172,989	15,924	\$168,682	\$1,141,074	18.92	1.74	\$71.66	\$3.79	14.8%
22	422,896	313,899	25,250	\$236,822	\$1,853,697	16.75	1.35	\$73.41	\$4.38	12.8%
26	469,626	329,221	29,320	\$262,991	\$2,112,982	16.02	1.43	\$72.07	\$4.50	12.4%
28	782,622	399,969	38,709	\$438,268	\$2,750,772	20.22	1.96	\$71.06	\$3.51	15.9%
32	529,637	264,971	26,616	\$296,597	\$1,880,161	19.90	2.00	\$70.64	\$3.55	15.8%
33	153,057	59,546	9,799	\$85,712	\$649,642	15.62	2.57	\$66.30	\$4.24	13.2%
34	768,433	371,210	36,195	\$430,322	\$2,569,004	21.23	2.07	\$70.98	\$3.34	16.8%
35	298,775	172,136	14,903	\$167,314	\$1,079,380	20.05	1.74	\$72.43	\$3.61	15.5%
38	979,091	565,823	41,598	\$548,291	\$3,108,395	23.54	1.73	\$74.72	\$3.17	17.6%
39	330,787	162,449	14,241	\$185,241	\$1,029,148	23.23	2.04	\$72.27	\$3.11	18.0%
41	543,242	314,307	28,366	\$304,216	\$2,039,525	19.15	1.73	\$71.90	\$3.75	14.9%
45	186,186	208,175	15,552	\$104,264	\$1,158,352	11.97	0.89	\$74.48	\$6.22	9.0%
58	33,201	64,883	6,396	\$18,593	\$453,175	5.19	0.51	\$70.85	\$13.65	4.1%
Total/average	9,079,434	4,701,966	410,509	\$5,084,485	\$29,687,508	22.12	1.93	\$72.32	\$3.27	17.1%
					Min/Max	13.27	1.16	\$101.25	\$4.58	10.3%

In January 2022, FAX split Route 58 into two separate routes (58 and 58E) and interlined the service. It is important to note Route 58E is subsidized by an outside agency. Route 58 provides service in the Northeast Fresno Area and Route 58E provides service to Valley Children's Hospital (VCH) and receives incremental funding from VCH. Incremental costs are the direct costs associated with the service (such as fuel, tires, and driver wages). Incremental costs do not include overhead costs (such as FAX administration costs or facility costs). Revenues received from the farebox on route 58E is in addition to the incremental costs.

FAX Passengers per Revenue Hour by Route

As Exhibit 28 illustrates, FAX Routes 45 and 58 were the only routes operating below the minimum standard of 13.27 passengers per hour, which is 60 percent of the system average.

Exhibit 28 Summary of Key Operation Indicators: Passengers/Revenue Hour (FY 2020)



FAX Fare Structure

It is the objective of FAX, as stated in the 2018 Regional Transportation Plan, to “Encourage and prioritize safety, appropriate frequency of bus service, reasonable fares, and the provision of adequate service to satisfy the transit needs which are reasonable to meet.”

FAX maintains a variety of fare media, which are detailed in the City of Fresno Master Fee Schedule. These fees are determined by the Fresno City Council, an elected body. Any changes to the transit fares must undergo a fare equity analysis, including public notification, and presentation before the Fresno City Council. Another factor in determining fares is the State Transportation Development Act (TDA). TDA regulations require FAX to maintain a minimum 20-percent farebox recovery ratio. Since the beginning of the COVID-19 pandemic, compliance with the farebox recovery ratio requirement has been suspended by California State Legislature.

FAX’s last system-wide fare increase was in January 2011. At that time the fare was increased from \$1.00 to \$1.25. The senior or disabled fare increased from \$0.35 to \$0.60 per trip. However, new fare media were introduced on July 24, 2017. A monthly pass was eliminated, and one-ride, 10-ride, and 31-day passes were introduced. At that time, FAX also ceased selling tokens but continued to accept them.

During the COVID-19 pandemic, FAX suspended fare collection for all riders between March 1 and August 31, 2021. When it reinstated fares on September 1, 2021, it lowered the base FAX fixed-route and Handy Ride by 25 cents. It also introduced free fares for children ages seven to 12 and veterans and active members of the military.

Exhibit 29 Fare Structure (2021)

Fare Category	General Public Base Fare	Reduced Fare (Senior/Disabled)
FAX Fixed-Route		
Cash fare (single trip)	\$1.00	\$0.50
1-ride card	\$1.00	\$0.50
10-ride card	\$9.00	\$4.50
31-day pass	\$36.00	\$18.00
Handy Ride		
ADA cash fare (single trip)	N/A	\$1.25
Companion fare (single trip)	\$1.25	N/A
Personal Care Attendant	Free	N/A
Monthly pass (up to 60 rides)	N/A	\$36.00

In 2021, FAX conducted a Fare Equity Analysis in advance of its proposed fare reduction concurrent with the reintroduction of fare collection in September 2021. While all the proposed changes constitute a reduction in fares, they do represent a fare change that warrants a Title VI Fare Equity Analysis.

Using a model comparing minority/low-income use of each fare category to the minority/low-income percentage of ridership, the Fare Equity Analysis found no disparate impact or disproportionate burden that exceeded the 20 percent threshold discussed beginning on page 64 for reductions to fixed-route fares, Handy Ride fares, and transfers. The Fare Equity Analysis also found there was potential for the expansion of the free fare policy to include active military and veterans to have a disparate impact and/or disproportionate burden; however, there was not enough data to determine this. The analysis stated that during FY 2022/23, FAX would utilize data collected as part of its 2022 customer survey to further explore whether changes to its free fare programs cause a disparate impact or disproportionate burden. Since then, per correspondence with the FTA, it has been determined that the expansion of free fares to veterans and active-duty military is not a Title VI issue, as equity analyses are not required for veterans and active duty-military. This updated Fare Equity Analysis will be presented for adoption to the Fresno City Council during the period of the next Title VI Program update.

III. CONCLUSION

As a result of the Title VI compliance assessment requirements as stated in FTA Circular 4702.1B, FAX, as a recipient of federal financial assistance, is operating an accessible, efficient, and affordable transit service to all minority and non-minority groups within the FCMA.

One hundred thirty-five (135) census tracts comprise the FCMA. Of this number, 82 (60.7 percent) of these tracts are deemed minority for the purpose of the Title VI Program analysis. The FCMA minority population makes up 68.8 percent (or 483,794 residents) of the total service area population. Currently, all FAX routes operate to or within one or more of the minority census tracts. On the basis of this and the Title VI Program analysis, FAX has guaranteed that no minority group is excluded from, or denied the benefits of, this federally subsidized transit system.