



2024 TITLE VI PLAN TRIENNIAL REPORT

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Orange County Transportation Authority does not discriminate on the basis of race, color, or national origin or any other mandate prohibited by law.

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INTRODUCTION

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

Since 1972, the Federal Transit Administration (FTA) has required recipients of federal assistance to certify compliance with the requirements of Title VI as part of the funding eligibility process.

Purpose of the Title VI Report

The purpose of this report is to document the practices and operations of the Orange County Transportation Authority (OCTA) for compliance with Title VI. This report’s intent is to document the steps OCTA has taken and will take to ensure that all services, programs, and activities supported by federal financial assistance are implemented without regard to race, color, or national origin and eliminate any additional barriers such as language or low-income status that may inhibit the use of the OCTA transit system.

Consistent with its commitment to meet FTA regulatory requirements, OCTA updates and submits a Title VI report on a triennial basis to the FTA Region 9 office via the Transit Award Management (TrAMS) portal.

OCTA is submitting this report as of the published due date of October 1, 2024, in accordance with FTA Circular 4702.1B guidance.

The Title VI reporting requirements as they relate to specific sections in this report are prepared in five main sections:

Section 1: General Reporting addresses the general reporting requirements that apply to all recipients of federal funds. These requirements include procedures for filing civil rights complaints, a list of Title VI investigations, complaints, and lawsuits, plans for providing meaningful access to persons with limited English proficiency; notification regarding protection under Title VI, means by which the public is involved in decision making processes, and provides documentation that the governing Board has been provided an opportunity to review and approve the Title VI Plan document prior to submitting the triennial report to the FTA.

Section 2: System-Wide Service Standards & Policies describes the OCTA system-wide service standards and policies for vehicle load, vehicle headway, on-

time performance, service availability, and vehicle assignment to ensure high-quality and safe levels of service to the public.

Section 3: Demographics & Service Profile Maps provides demographic and service profile maps, charts, and travel patterns which include minorities and low-income in the context of the programs and services that OCTA provides.

Section 4: Transit Service Monitoring evaluates the extent to which OCTA has met its service standards and the levels of service provided to the various communities served by OCTA.

Section 5: Evaluation of Service and Fare Changes describes the service change process and summarizes the major service changes and/or fare increases/decreases during the triennial reporting cycle.

Title VI Certifications and Assurances

At the start of each federal fiscal Year, OCTA executes and submits the FTA Certifications and Assurances within 90 days of the date a notice of availability is published by FTA in the Federal Register. OCTA submits these assurances to FTA to convey intent and ability to comply with all applicable provisions, including those of Title VI. A copy of the 2024 FTA Certifications and Assurances is provided in **Attachment A**.

SECTION 1: GENERAL REPORTING REQUIREMENTS

The general reporting requirements apply to all recipients of federal funds regardless of the size of its urban area population. These general reporting requirements include: procedures for notifications regarding protection under Title VI; methods for filing civil rights complaints; a list of Title VI investigations, complaints, and lawsuits; distribution of information and outreach efforts for programs and services plans; means for providing meaningful access to persons with limited English proficiency; the racial composition of the membership of non-elected boards; and a summary of the monitoring policies utilized to ensure all sub-recipients are in compliance with Title VI regulations.

Notification of Protection Under Title VI

As required by Title VI circular guidance, OCTA has developed various media to notify its beneficiaries of their rights and protections under Title VI. The OCTA Title VI protection notification and multi-language permanent bus placards are on all revenue vehicles. Brochures are available on all revenue vehicles and in the OCTA lobbies in English and Spanish. The OCTA store also has the abovementioned brochures in addition to Title VI electronic signage in English, Spanish, and Vietnamese. Title VI information can also be translated into all identified Safe Harbor provision languages at [OCTA.net/about/about-octa/title-vi](https://www.octa.net/about/about-octa/title-vi). The OCTA electronic bus book also includes notification protection information and is available in English and Spanish. OCTA bus stop and transportation center informational kiosks include Title VI protection information in English and Spanish. Examples of the protection notice media are provided in **Attachment B**.

OCTA's Title VI Complaint Procedure & Complaint Form

It is the policy of OCTA to employ its best efforts to ensure that all programs, services, activities, and benefits are implemented without discrimination. This section provides information on OCTA's procedure for filing a complaint alleging discrimination on the basis of race, color, or national origin.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with OCTA, the FTA, or the Secretary of Transportation. Further, OCTA prohibits intimidation, coercion, or engagement in other discriminatory conduct against an individual who has filed a complaint.

The OCTA complaint procedure and form are provided in **Attachments C and D**.

List of Transit-Related Title VI Investigations, Complaints and Lawsuits

During the triennial review period, there were no valid transit-related Title VI complaints, investigations, or lawsuits naming OCTA, any of its affiliates or sub-recipients, alleging discrimination on the basis of race, color, or national origin. A chart listing all complaints received during the triennial period is provided in **Attachment E**.

Public Participation Plan and Summary

Public Involvement Plan (PIP)

In consideration of Title VI compliance and Executive Orders 12898 and 13166, OCTA has developed a Public Involvement Plan (PIP). The intended purpose of the PIP is to demonstrate public involvement efforts and enhance access to OCTA's transportation decision-making process for low income, minority, and limited English proficient (LEP) populations. The PIP includes public participation methods, strategies, specific project examples, and performance measures and objectives.

A copy of the 2024 Public Involvement Plan is provided in **Attachment F**.

Summary of Outreach Efforts for Title VI Projects and Programs, and Public Committees

Annual recruitment efforts for two public committees took place in the months of February through June in 2022, 2023, and 2024. A copy of the press releases, recruitment efforts, and plan for the public committees are provided in **Attachment G**.

In addition, public comments are sought at bi-monthly OCTA Board meetings. Each meeting includes a specific time for public comments. This time provides an open forum for

individuals to present their concerns regarding transit operations and policies directly to the OCTA Board of Directors (Board) and staff. In the event that public comments are received with reference to Title VI compliance, OCTA would review these comments and take appropriate action to address and resolve these matters.

On January 24, 2022, the Board directed staff to implement the Public Involvement Plan for the Making Better Connections Study, a comprehensive study to assess emerging travel trends and the transit network design in Orange County. The Study evaluated and developed improvements to OC Bus service and route structures to better align with existing ridership.

The Public Involvement Plan was conducted in two phases. The Board-directed public involvement plan began on January 24, 2022, to gauge customer reaction and solicit feedback on the public's transit preferences to draft the final recommendations of the Study. Although unable to conduct in-person meetings due to COVID-19 restrictions, OCTA adhered to Title VI Policy by using multifaceted approaches and extensive public outreach to diverse and hard-to-reach communities. This effort resulted in 1,476 surveys and comments received. A variety of tactics were utilized to gain comprehensive and meaningful public input, including information in emails, virtual community meetings, e-Newsletters, bus advertisements and collateral, print advertisements, local jurisdiction communications, online and printed surveys, as well as OCTA advisory committee briefings. All information was published in English, Spanish and Vietnamese.

With Board direction, Phase 2 of the public outreach plan was conducted between May 23 and July 25, 2022, to solicit feedback on the draft service plan. The comprehensive outreach program was designed following Title VI Public Involvement Plan guidelines and included a tactical outreach strategy that facilitates engagement via in-person and virtual community meetings and a public hearing, bus ride-alongs, and pop-ups at transit hubs and local communities. Information was provided through OCTA's organic and paid social media channels, email blasts to customers, On the Move blog, print publications, and information provided on buses. An interactive comparative trip planning tool was also used to gather passenger feedback on, before, and after travel paths and times. In addition, OCTA reached out to cities for feedback and presented at individual and OCTA advisory committee meetings.

Between May 23 and July 25, 2022, the public outreach process resulted in more than 8,200 comments and in-person engagements on the draft service plan, which demonstrated the in-depth public involvement program and the level of interest from both users of OC Bus service and the general public. Responses were being used to inform the draft bus service plan, beginning as early as February 2023.

Copies of the public involvement plan and Title VI equity analysis for the Making Better Connections Study are provided in **Attachments H and I**.

In addition, and to memorialize OCTA's longstanding practice of supporting and engaging diverse communities and businesses, an OCTA statement on equity was developed to be consistent with the 2024 Board Initiatives and CEO Action Plan. The statement, as follows,

is consistent with existing policies and procedures and will help continue to position OCTA as an agency that prioritizes equity in all agency initiatives.

To foster a culture of diversity, equity, and inclusion, the Orange County Transportation Authority will:

- Support the unique attributes and needs of our communities.
- Provide access to safe and healthy opportunities that allow residents, workers and visitors to thrive.
- Build trust and make decisions through meaningful engagement with the people we serve.

Limited English Proficiency Plan (LEP)

The OCTA Limited English Proficiency Plan received Board approval on October 23, 2023 and is provided in **Attachment J**.

Racial Composition of Membership of Non-Elected Boards

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” Depicted below is the membership of OCTA’s non-elected decision-making bodies by race.

Committee	Caucasian	Hispanic	African American	Asian/ Pacific Islander American	Native American	Other
Citizens Advisory Council	71%	16%	0.0%	10%	0.0%	3.2%
Accessible Transit Advisory Committee	51.9%	33.3%	0.0%	14.8%	0.0%	0.0%

OCTA’s efforts to encourage minority and low-income members of the population to participate in the various decision-making boards is specified in the OCTA Public Involvement Plan provided in **Attachment F**.

Monitoring Subrecipients

In accordance with the OCTA subrecipient oversight program, the Grant Compliance Office monitors and provides guidance to OCTA’s federal subrecipients, which primarily consists of cities, agencies, and non-profit organizations. These oversight activities include annual site visits, compliance certifications and full compliance reviews undertaken based on assessments of non-compliance risk to OCTA.

OCTA's subrecipient compliance review activities offer a detailed assessment of subrecipient activities, including Title VI. These activities include an evaluation of the subrecipient's Title VI policies, procedures, notifications and complaint logs, as well as an assessment of their most current Title VI Plan. The most recent review of subrecipient Title VI Plans is underway and scheduled for completion by October 2024. The process also provides an opportunity to both educate and train subrecipient staff on current requirements and industry best practices. Should a non-compliance issue arise, the Grant Compliance Office issues a non-compliance finding and works with the subrecipient on an appropriate action to correct the issue. Progress towards implementing a corrective action is tracked until the non-compliance finding is remedied.

The site visit and annual compliance certification processes provide a more frequent opportunity for Grant Compliance Office staff to engage with subrecipients and proactively identify potential compliance issues before they arise. This process also offers an opportunity to provide guidance, educate and train subrecipient staff to help ensure equitable access to programs and services.

In addition, OCTA ensures nondiscriminatory pass-through of federal financial assistance through a competitive call-for-projects process. The process includes signed attestations of compliance with federal requirements in grant application documents, pre-award meetings with applicants that include discussions on applicable federal requirements, including Title VI. The grant process also includes pre-award checks for debarment and suspension and reviews of Single Audits, which may highlight any prior Title VI related concerns. More detailed information regarding these oversight activities is available in the 2023 OCTA Subrecipient Monitoring Procedures Guide, which is available for review in **Attachment K**.

Construction of Facilities

Transit Security and Operations Center (TSOC)

The TSOC project will be a new facility designed to meet State of California building standards for current and future operational needs and requirements of OCTA. Planned uses for the TSOC include OCTA essential services, including an emergency operations center, central communications, field operations, security and emergency preparedness, transit police, technical infrastructure, and personnel to support OCTA operations. It is anticipated that a fully executed construction contract and notice to proceed will be issued prior to October 1, 2024. A copy of the Title VI facility equity analysis is provided in **Attachment L**.

OC Streetcar Maintenance Storage Facility (MSF)

The OC Streetcar is a 4.15-mile modern streetcar line that will serve Santa Ana's historic downtown and surrounding areas. The project emerged as the preferred alternative from the Santa Ana-Garden Grove (SA-GG) Fixed Guideway Corridor project. To support operation of the streetcar, a MSF is required and will function as the storage and maintenance site of the streetcar vehicles. Construction of the MSF is ongoing and is anticipated to complete in 2025. FTA requires Title VI analysis for the selection of the MSF

site, as well as for the overall project prior to the initiation of service. The Title VI facility equity analysis is provided in **Attachment M**. The Title VI analysis for the initiation of service will be prepared and submitted to FTA six months in advance of revenue service.

Governing Board Review and Approval of Title VI Plan

The meeting minutes and resolution documentation for the September 9, 2024, Board meeting, demonstrating the Board had the opportunity to review and approve the 2024 Title VI Plan is provided in **Attachment N**.

SECTION 2: SYSTEMWIDE SERVICE STANDARDS AND POLICIES

To guard against discriminatory service design or transit operations, Title VI guidelines require the adoption of Systemwide Service Standards and Policies. In keeping with these guidelines, The Orange County Transportation Authority (OCTA) has established criteria for its transit services to ensure fair use and equitable access to OCTA resources and services. The section that follows describes OCTA's Systemwide Service Standards for vehicle load, vehicle headway, on-time performance, service accessibility, transit amenities, and policies for vehicle assignment. OCTA's service standards and policies are included in **Attachment O**.

Systemwide Service Standards

Vehicle Load

OCTA's Vehicle Load applies to the maximum number of passengers allowed on a revenue vehicle in order to ensure the safety and comfort of customers. The load standard is expressed as the ratio of passengers to the number of seats on the vehicle and it varies by mode and by time of day. OCTA's vehicle load service standard is 130 percent average during the a.m. and p.m. peak periods and 100 percent off peak and weekend periods.

Vehicle Headway

Vehicle Headway is the time interval between vehicles on a route that allows passengers to gauge how long they will have to wait for the next vehicle. Similar to vehicle load, vehicle headway varies by mode and time of day. Vehicle headway is primarily determined by bus ridership and is limited by the availability of resources to operate the system.

Vehicle Headway service standard for local fixed-routes is defined as frequencies of 30 minutes or less during the service day, which is defined as 6:00 a.m. to 6:00 p.m. The service standard for community routes is defined as service frequencies of 60 minutes or less during the service day. Stationlink (rail feeder routes) have variable trip times linked to employment centers start and end times. These are peak hour service and only operate during commute periods. Rapid service is a companion to local service and as such also uses the 30-minute or less standard.

On-Time Performance

OCTA defines On-Time Performance (OTP) as not more than five minutes late. OTP is measured at the time-points. A trip is on-time as long as it does not leave a time-point ahead of the scheduled departure time and no more than five minutes later than the scheduled departure time. The OTP Service Standard is measured at 80 percent of the route level as reliable.

Exclusions from OTP are Stationlink routes which are scheduled to depart and arrive at Metrolink stations to meet train arrivals and departures and subject to Metrolink schedule reliability.

Service Accessibility

Service Accessibility is the percentage of population in proximity to bus service. The OCTA Service Accessibility Standard is 90 percent and includes the combination of residents and jobs within a half-mile of public bus routes in Orange County.

Transit Amenities

OCTA does not have decision-making authority over transit amenities such as bus benches and shelters at all on-street bus stops and city-owned transit facilities. These transit amenities are solely installed and maintained by the local city/County of Orange jurisdiction. OCTA is exclusively responsible for placing a bus stop sign and schedule-related information. All the features of the bus stop signs are consistent throughout OCTA's service area, consisting of a sign with the OC Bus logo and route number and a cassette with bus route basic schedule information such as headways and span of service. Some stops that are located in areas with minimal lighting may have a light switch to turn on a solar flashing light to notify the coach operator that a passenger is waiting at the stop. All OCTA's Rapid bus routes have a unique sign to instruct passengers where they can board this rapid, limited stop service. OCTA is currently testing real-time passenger information using electronic signage on a recently implemented Rapid limited stop service (Route 553). This route operates primarily in disadvantaged communities along Main Street in the core service area, with about 72 percent of its route length operating in minority areas.

There are five transit facilities in the service area that are owned and maintained by OCTA. In addition to the amenities found at the on-street stops, these transit facilities also have route and schedule information triangular kiosks, seating benches, emergency call posts, and waste receptacles.

Vehicle Assignment

Vehicle Assignment refers to the process by which vehicles are assigned to routes throughout the system. The policy used for vehicle assignment is governed by various operational characteristics and constraints. In 2024, OCTA's fixed-route active fleet is composed of 439 Compressed Natural Gas (CNG) buses, ten Fuel Cell Electric buses, ten Battery Electric buses, and 20 contingency Diesel-powered buses.

At an average age of 8.2 years for the fixed-route bus fleet, OCTA's fleet of vehicles is beyond its mid-life. However, OCTA is in the process of replacing its' first generation of CNG vehicles. With 87 buses in the process of acceptance, the average age of the fleet will diminish. Fixed-route vehicles are scheduled for replacement after a minimum of 18 years of service. OCTA is currently testing zero emissions bus technologies. Ten hydrogen fuel cell electric buses and ten battery electric buses are currently being tested in revenue service. Most of OCTA's fleet is powered by environmentally friendly fuels assigned systemwide.

OCTA currently makes use of various vehicle types. All routes are accessible to persons with disabilities. Vehicle assignments to particular routes vary due to individual characteristics of each route and assignments are based on the following criteria:

- Size of division and maintenance capabilities
- Passenger loading on the routes
- Equalizing bus series mileage
- Equalizing the percentage of spares by bus series
- Particular route operating conditions

A copy of the OCTA Vehicle Assignment policy is provided in **Attachment P**.

SECTION 3: DEMOGRAPHIC DATA MAPS

This section addresses the Program Specific Requirements of Title VI and provides numerous maps, overlays, and summary statistics of the OCTA service area in relation to demographic data from the 2022 American Community Survey.

Demographics and Service Profile

For each Title VI triennial report, OCTA provides numerous maps, overlays, and summary statistics of the OCTA service area, using demographic data from the American Community Survey. These materials are useful both for describing the current composition of neighborhoods in terms of minority and low-income residents, and for understanding the spatial relationships of these areas in the context of the services that OCTA provides.

Exhibits 1 through 7 present a series of maps and overlays that describe these relationships as required by the Department of Justice, 28 CFR Part 42, Subpart F and the Department of Transportation, 49 CFR Part 21, Title VI of the Civil Rights Act of 1964.

For this report, census data from the 2018-2022 American Community Survey 5-year estimates for each block group within Orange County is used to determine the countywide percentage of minorities (**Attachment Q**). In Orange County, minority residents comprise 61.5 percent of the total county population. This countywide average is used as the benchmark to determine whether a specific block group is considered a minority area. Block groups with minority populations that are at or exceed the 61.5 percent average are designated as a minority census block group. These minority areas are mapped and highlighted in **Exhibit 1, Exhibit 6, and Attachment Q** identifying minority transit routes, which are those with over one-third of its total length serving within a minority census block group.

Low-income areas are mapped and highlighted in **Exhibit 7**, which identifies low-income areas as those block groups where the percentage of persons living below 150 percent of the Federal Poverty Guidelines exceeds the countywide average of 16 percent.

These GIS maps reveal the distribution of minority populations in relation to OCTA's bus services and the extent to which members of minority groups are beneficiaries of OCTA bus services:

- **Exhibit 1: Minority and Non-Minority Populations** displays the distribution of minority and non-minority areas within Orange County. The minority distribution is determined by identifying census block groups where the minority population is greater than the countywide average of 61.5 percent.
- **Exhibit 2: Major Streets and Highways** map displays all major streets and highways in Orange County based on the 2023 OCTA Master Plan of Arterial Highways

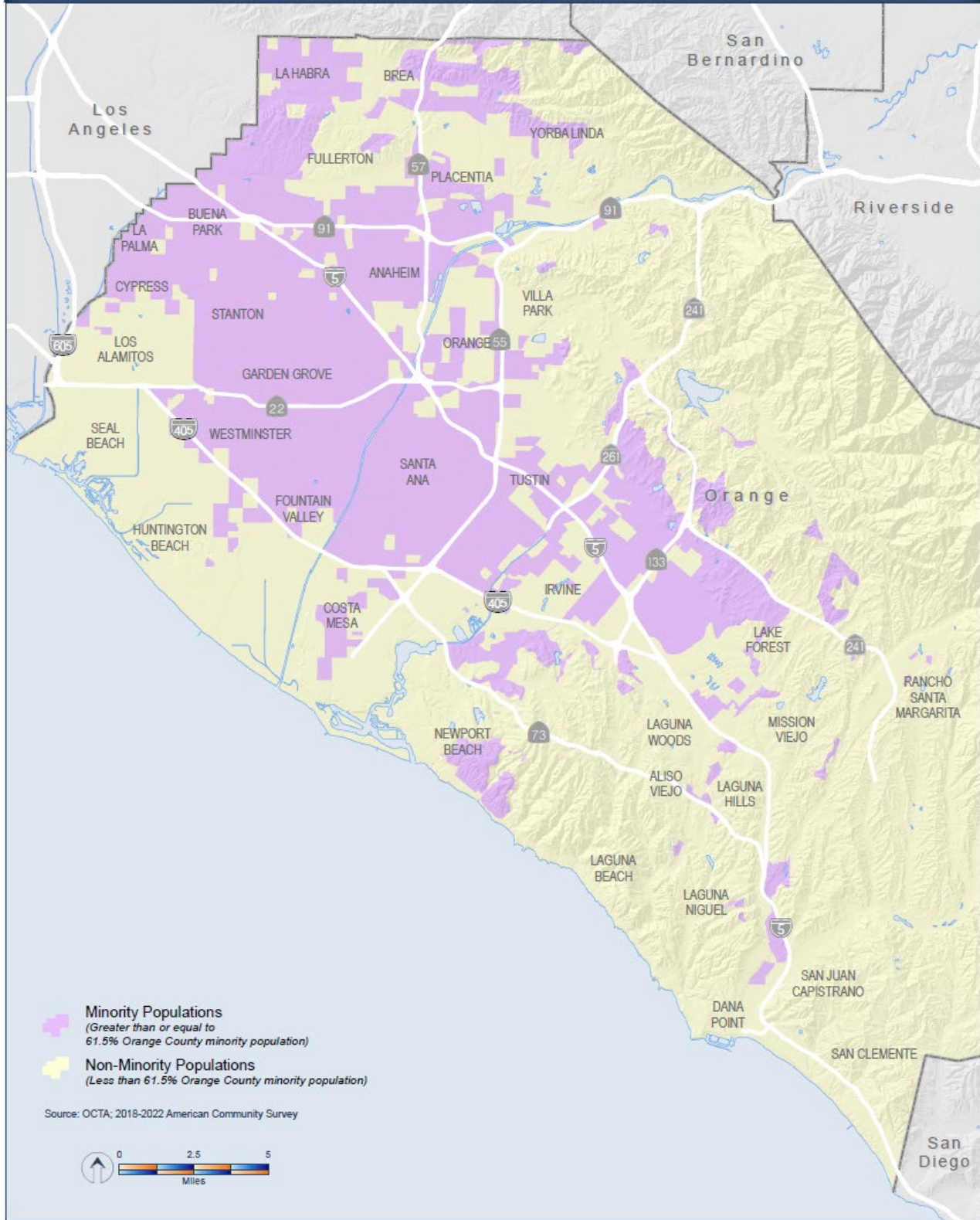
(MPAH). The major streets and highways are shown in relation to the minority and non-minority populations.

- **Exhibit 3: OCTA Bus Routes by Service Type** illustrates OCTA's transit system by route type. Route types include Local, Community, Rapid, "Stationlink" (rail feeder), Shuttle, and the OC Streetcar (currently under construction). The different route types overlay the minority and non-minority populations to reveal their geographic relationship. The bus routes in this map are based on the February through May 2024 service change.
- **Exhibit 4: Transit-Related Facilities** identifies the locations of all key transit-related facilities in relation to the minority and non-minority populations within Orange County. Key transit-related facilities include park and rides, transportation or bus centers, OCTA bus bases, the OCTA administrative offices, Metrolink rail alignment, and Metrolink rail stations.
- **Exhibit 5: Major Activity Centers** illustrates the distribution of primary activity centers in relation to minority and non-minority populations within Orange County. Activity centers include concentrations of employment, elementary, middle and high schools, universities, colleges, and hospitals.
- **Exhibit 6: Minority Bus Routes** shows OCTA's local bus routes having one-third or more of their overall length within minority block groups. The bus routes in this map are based on the February 2024 service change.
- **Exhibit 7: Low-Income Populations** displays the distribution of low-income block groups within Orange County based on the percentage of the population below 150 percent of the Federal Poverty Guidelines. The countywide average is 16 percent.

On-Board Bus Passenger Surveys

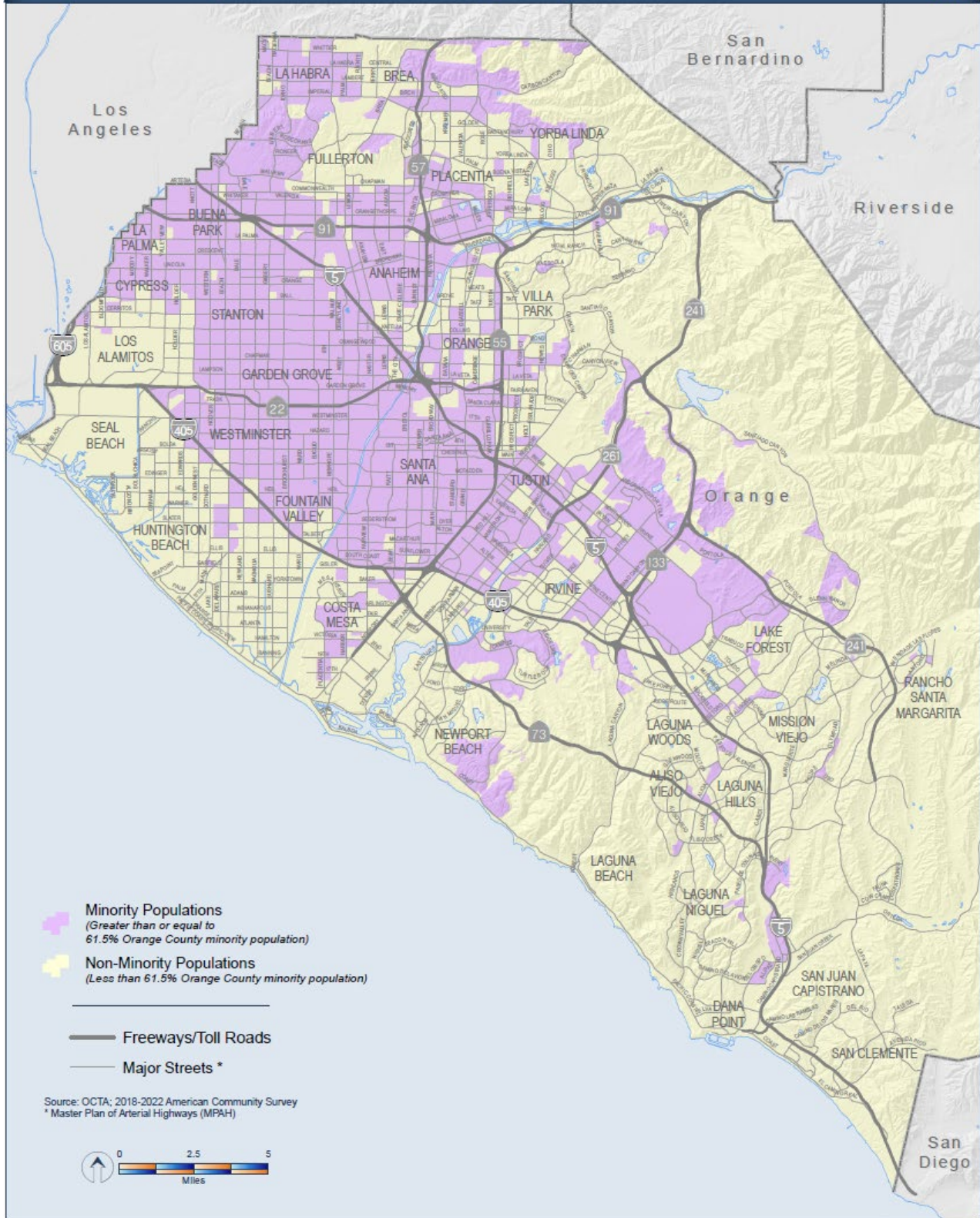
OCTA also conducts on-board passenger surveys to collect information on passenger demographics and travel patterns, including trip origin and destination. OCTA's most recent on-board Survey was conducted in Spring 2024. The focus of this survey was origin-destination, travel patterns, trip purpose plus other rider demographics such as race, English proficiency, native language, household income, and fare usage. The survey was translated in Spanish and Vietnamese, and individuals that assisted with the on-board survey wore a surveyor lanyard containing a call-in number for language assistance with over 160 languages available. The survey results will be available in Summer 2024.

Exhibit 1: Minority and Non-Minority Populations



2/16/2024

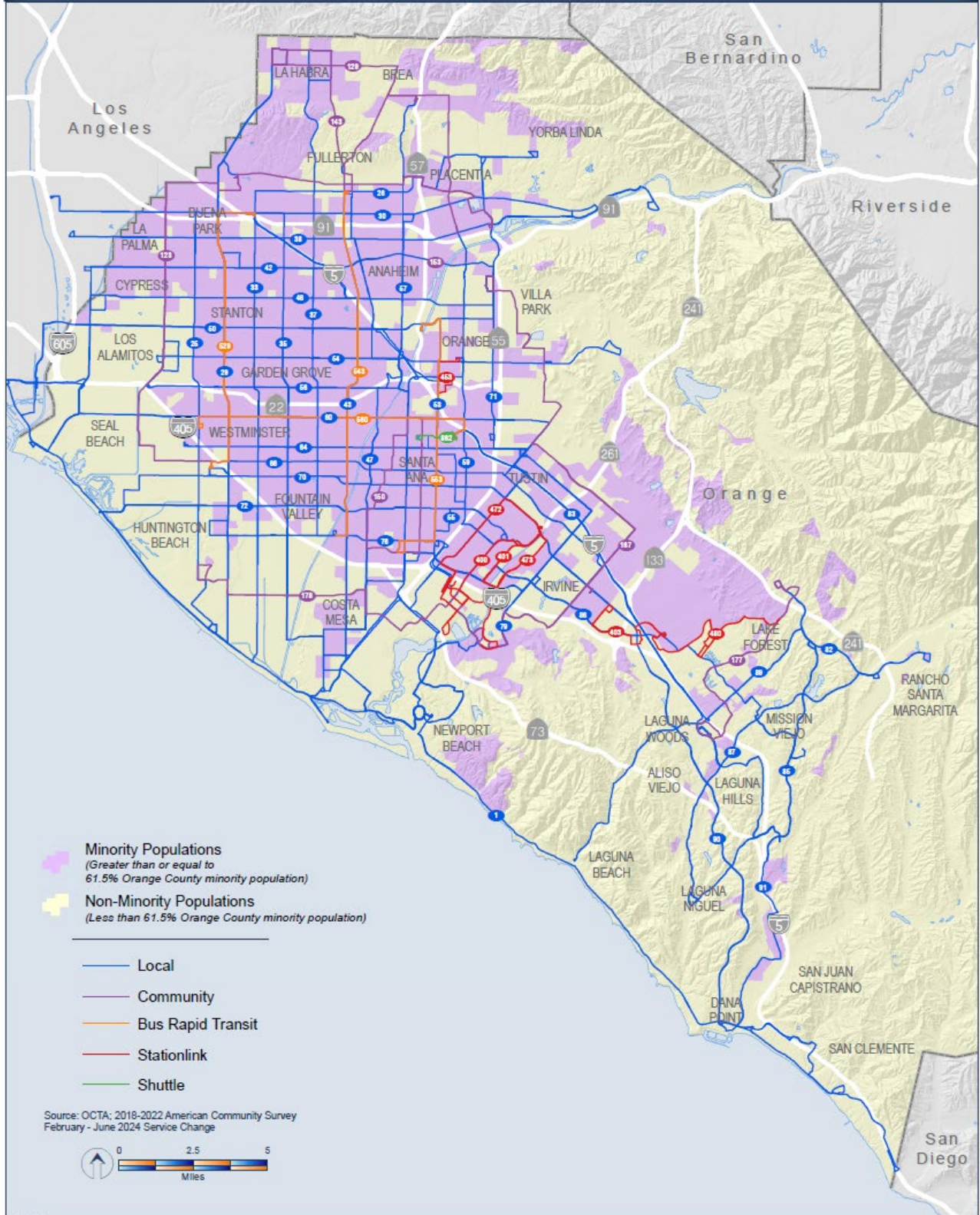
Exhibit 2: Major Streets and Highways



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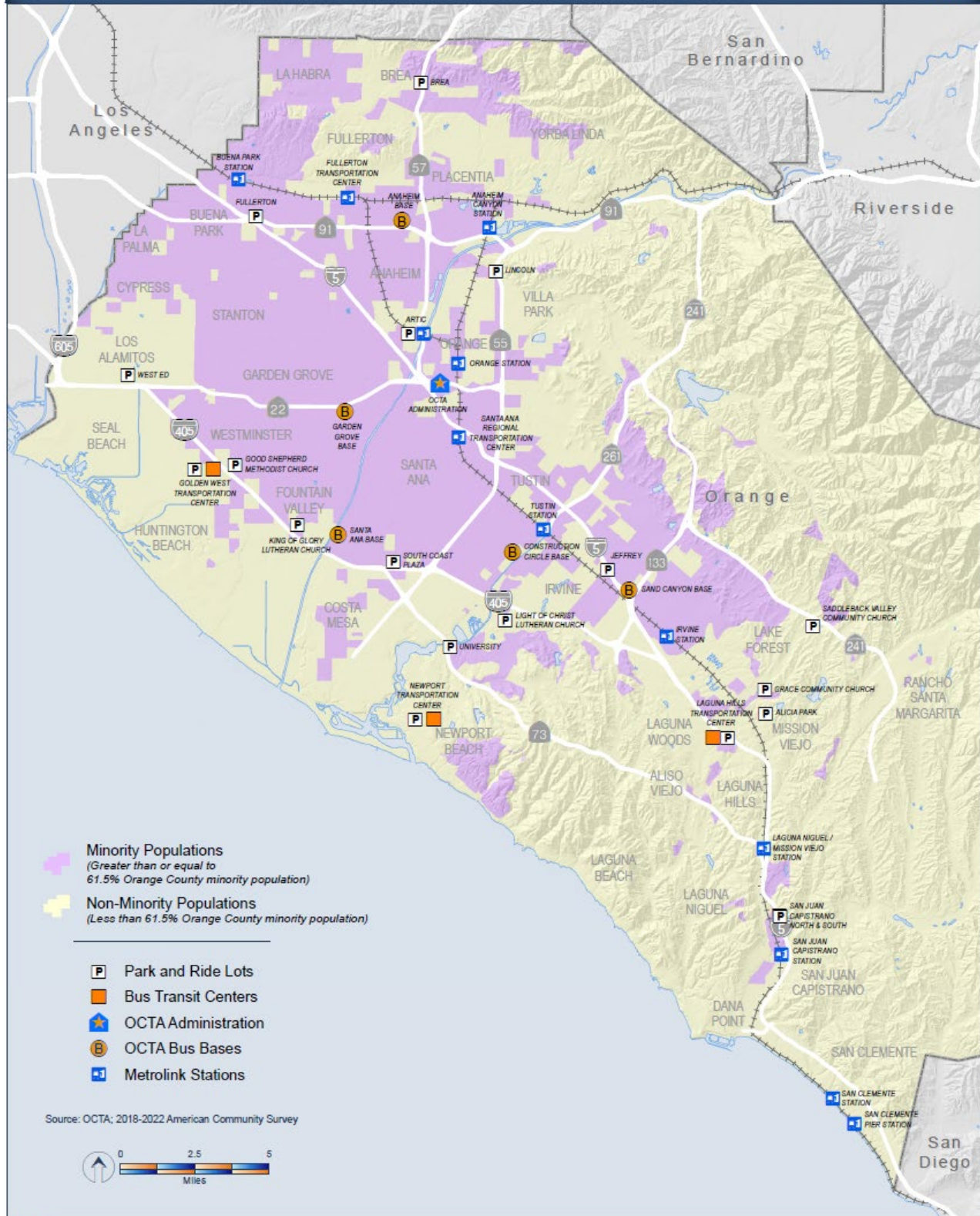
Exhibit 3: OCTA Bus Routes by Service Type



2/16/2024

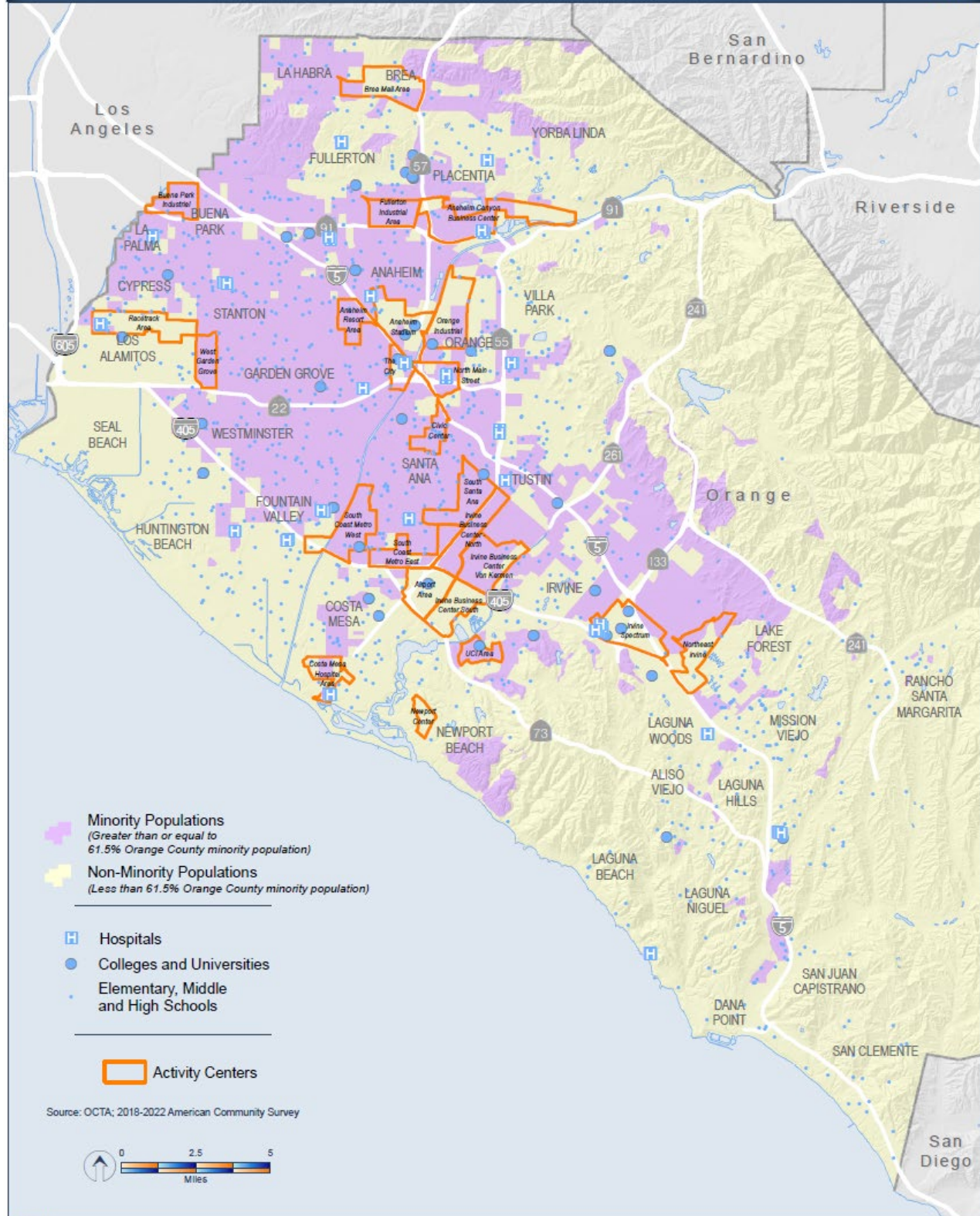
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Exhibit 4: Transit-Related Facilities



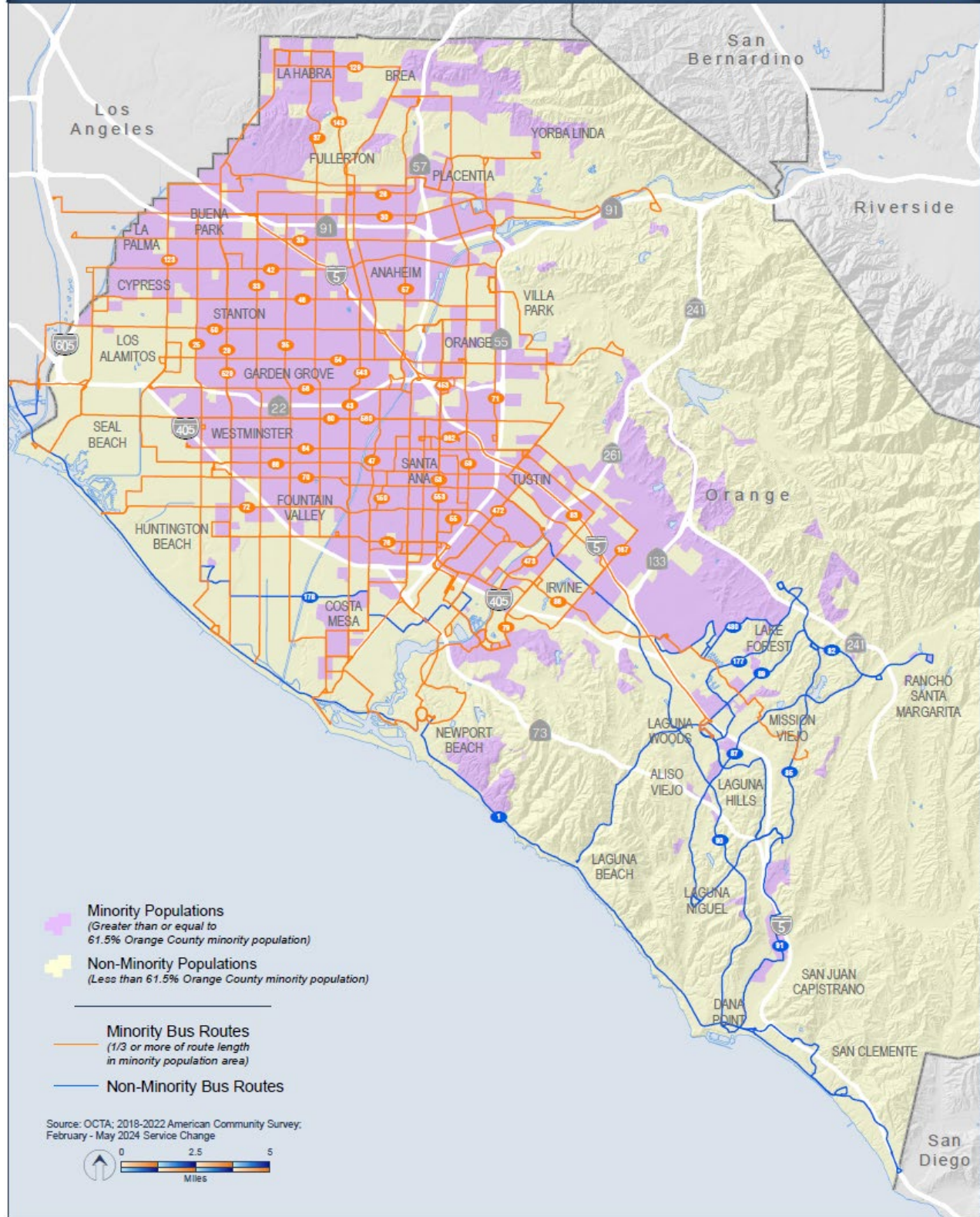
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Exhibit 5: Major Activity Centers



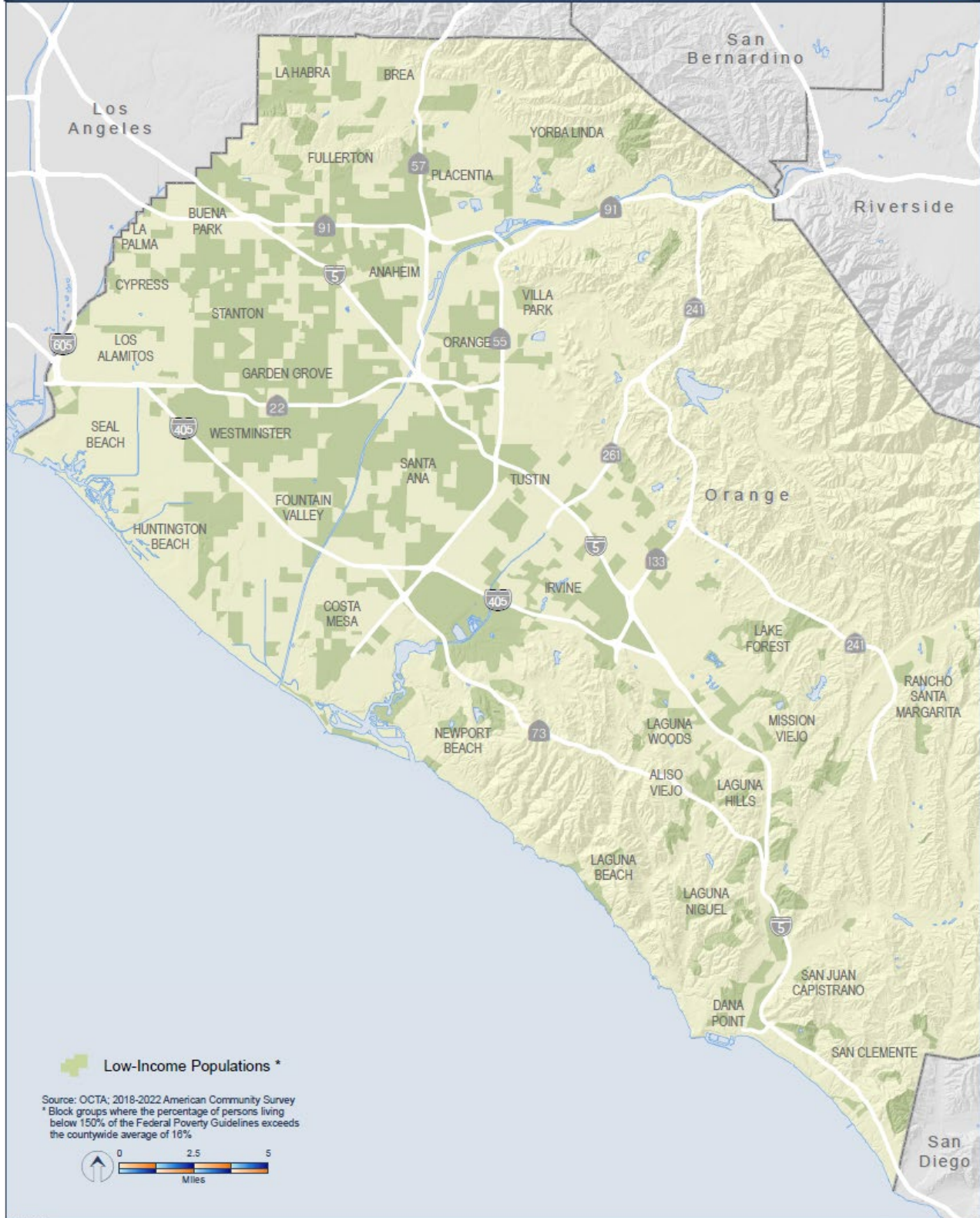
2/16/2024

Exhibit 6: Minority Bus Routes



7/18/2024

Exhibit 7: Low-Income Populations



2/16/2024

SECTION 4: SERVICE MONITORING

OCTA is the provider of public transportation that operates 50 or more fixed route vehicles in peak service and is located in an UZA (Urbanized Areas) of 200,000 or more in population. In order to ensure compliance with Title VI regulations, the FTA requires OCTA to monitor the performance of its transit system relative to OCTA systemwide service standards and service policies with respect to minority versus non-minority areas not less than once every three years. OCTA has established internal guidelines for ensuring compliance with Title VI as part of its ongoing project management and contract administration efforts.

LEVEL OF SERVICE COMPLIANCE

Systemwide Service Standards

The procedure for examining levels of service as described in the FTA Title VI Guidelines involves comparing systemwide service standards and policies for the system as a whole to individual performance of routes serving minority communities.

Minority persons account for 61.5 percent of the Orange County population. Minority areas are block groups where minority persons make up 61.5 percent or more of all persons in each block group. Local bus routes having one-third or more of their service lengths within minority block groups are considered minority bus routes.

The Route Characteristics Charts in **Exhibits 8–10** show performance results for the OCTA fixed-route system including peak load factor, on-time performance, and vehicle assignment, number of vehicles and average vehicle age.

The discussion that follows provides a briefing of the monitoring results for how OCTA performed in comparison to the systemwide service standards identified in Section 2 of this report. It is important to note that the coronavirus (COVID-19) pandemic had a dramatic impact on service operated and transit ridership. The impacts were initially felt when the Governor of the State of California issued the stay-at-home order in March 2020. The pandemic affected service performance. Since then, OCTA's ridership and performance has steadily increased.

Vehicle Load

OCTA's standard states that peak load factors should not exceed 130 percent during the peak period and should not exceed 100 percent for other time periods. All routes currently have less than 100 percent average peak loads based on an analysis of Automatic Passenger Counter data from the May 2024 Service Change (**Exhibit 8**). Vehicle loads have steadily increased after a significant decline in ridership during the COVID-19 pandemic and social distancing requirements.

The average morning peak period vehicle loads for all OCTA bus routes is about 43 percent; during afternoon peak period, the average loads are about 47 percent. During the midday period, OCTA bus routes average about 42 percent loads.

Minority routes show slightly higher loads than non-minority routes during all time periods. During the morning peak periods minority routes average about 44 percent loads and 49 percent in the afternoon peak period. During the midday, minority bus routes average about 44 percent.

Non-minority routes average about 33 percent loads during the morning peak period and about 31 percent during the afternoon peak period. Midday loads average about 26 percent.

The table below shows the minority and non-minority average loads by time-of-day and weekend service.

Route Type	Weekday			Weekend	
	AM Peak	Base (Midday)	PM Peak	Saturday	Sunday
Minority	44.2%	44.3%	48.7%	41.7%	37.8%
Non-Minority	32.5%	25.6%	31.2%	26.9%	28.6%
Systemwide	43.3%	41.9%	47.1%	40.6%	37.2%

On-Time Performance

Since 2013, on-time performance is determined using the Automated Vehicle Locator (AVL) system. AVL data measures all trip times at timepoints for each bus route and the results are compared to the service standards which state that at timepoints, a trip is on-time as long as it is no more than five minutes late and no more than zero minutes early. A bus route’s schedule is considered to be on-time if 80 percent of the timepoints measured during the service day are no more than five minutes late and no more than zero minutes early.

An analysis of data for the May 2024 Service Change shows that systemwide on-time performance is at 78.6 percent which is slightly lower than the 80 percent target (**Exhibit 9**). However, schedule adjustments were implemented in the May 2024 service change which will improve on-time performance. Initial reports for the month of June 2024 indicate on-time performance has surpassed the 80 percent standard. Minority routes had an average on-time performance of 78.6 percent while non-minority routes average 78.8 percent.

Vehicle Headway

Vehicle headway is the time interval between buses on a route that helps passengers gauge the waiting time between trips. Similar to passenger loading, headways vary by mode and time of day. Vehicle headways are primarily determined by bus ridership (demand) and are constrained by the availability of resources to operate bus service.

OCTA service standards state that Local and Rapid service should operate at least at 30-minute intervals during the service day, and that Community services should operate at least at hourly intervals. Stationlink (rail feeder routes) vary according to demand and connections with commuter rail services. These routes operate during peak commute periods only.

The average morning peak period headway for all OCTA bus routes is about 29 minutes; during afternoon peak period, the interval is approximately 30 minutes. During the midday period, OCTA bus routes operate about every 31 minutes on average.

Minority routes operate more frequently than both the system average and non-minority routes during all time periods. During the morning peak periods minority routes average 26 minutes between trips and 27 minutes in the afternoon peak period. During the midday, minority bus routes operate about every 28 minutes.

Non-minority routes operate every 48 minutes during the morning peak period and every 46 minutes during the afternoon peak period. Midday intervals average about 49 minutes.

The table below shows the minority and non-minority headways by time-of-day and weekend service.

Route Type	Weekday			Weekend	
	AM Peak	Base (Midday)	PM Peak	Saturday	Sunday
Minority	26.4	28.4	27.2	32.3	33.0
Non-Minority	47.6	49.1	45.6	59.5	61.9
Systemwide	28.8	30.9	29.5	34.5	34.9

Distribution of Transit Service and Amenities

Transit Accessibility

The table below shows the percentage of minority and non-minority area population and jobs served. OCTA’s standard is that bus service should operate within half-mile of 90 percent of the service area population and jobs. For the entire service area, 86 percent of the population and jobs are currently served by a bus route. The percentage in minority areas is 94 percent and 78 percent in non-minority areas, as shown in table below.

	Population & Jobs in Service Area (Orange County)	Population & Jobs within 1/2 Mile of Bus Route	Percent
Minority Areas	2,634,975	2,472,278	94%
Non-Minority Areas	2,527,415	1,959,794	78%
Total Service Area	5,162,390	4,432,072	86%

Transit Amenities

OCTA does not have decision-making authority over transit amenities such as bus benches and shelters at all on-street bus stops and city-owned transit facilities. These transit amenities are solely installed and maintained by the local city/County of Orange jurisdiction. OCTA is exclusively responsible for placing a bus stop sign and schedule-related information. There are 5,224 bus stops in the service area, of which 53 percent are located in minority areas and 47 percent in non-minority areas. The sum of all amenities in minority areas account for 53 percent while amenities in non-minority areas account for 47 percent.

On-Street Stops				
Total	In Minority Area	In Non-Minority	% in Minority	% in Non-minority
Bus stops				
5,224	2,731	2,493	52%	48%
Bus stop signs				
5,174	2,719	2,487	53%	48%
Bus stop schedule information cassettes				
5,174	2,687	2,487	52%	48%
Solar lights				
1,032	676	356	66%	34%
Real-time Passenger Information digital signs				
23	23	-	100%	0%
Total amenities				
16,627	8,836	7,823	53%	47%

There are five transit facilities in the service area that are owned and maintained by OCTA. In addition to the amenities found at the on-street stops, these transit facilities also have seating benches and waste receptacles. Two transit facilities are located in minority areas and three are located in non-minority areas. Combined, transit facilities in minority areas account for 44 percent of the amenities and transit amenities in non-minority areas account for 57 percent of the amenities.

The table below shows the quantities and percentages of amenities located in minority versus non-minority areas.

OCTA-owned Transit Centers				
Total	In Minority Area	In Non-Minority	% in Minority	% in Non-minority
Transit Centers				
5	2	3	40%	60%
Bus stop signs				
43	17	26	40%	60%
Route & Schedule information triangular kiosks				
10	3	7	30%	70%
Waste receptacles				
53	17	36	32%	68%
Seating benches				
111	46	65	41%	59%
Emergency Call Posts				
10	4	6	40%	60%
Total amenities				
232	89	143	38%	62%

Vehicle Assignment

During the peak period, 493 bus assignments are operated of which 442 or 90 percent are assigned to minority transit routes. The OCTA fleet average age is approximately 8.2 years. The average age of the vehicles assigned to serve minority routes is approximately 8.2 years. The average of the buses on non-minority routes is 8.1 years (**Exhibit 10**). The average vehicle age on minority and non-minority routes had decreased slightly from nine years in 2021 to 8.2 years in 2024. A large portion of the fleet is in the process of being replaced. The next triennial review will reflect a younger fleet.

Exhibit 8: Vehicle Load Analysis

Average Maximum Vehicle Loads for Local, Community, Rapid Bus, and Shuttle Routes (May 2024 Service Change)

Route	Route Description	Route Type	Type	Total Route Length (miles)	Route Length (miles) within Minority Area	Percent of Route within Minority Area	Weekday AM Peak Average Max Load %	Weekday Base Average Max Load %	Weekday PM Peak Average Max Load %	Saturday Base Average Max Load %	Sunday Base Average Max Load %
MINORITY ROUTES											
25	Fullerton PNR - Huntington Beach	Local	Minority	18.2	8.9	48.8%	42.1%	36.1%	46.0%	43.4%	37.2%
26	Fullerton PNR - Yorba Linda	Local	Minority	13.6	8.2	60.0%	40.3%	35.4%	40.9%	36.3%	27.4%
29	LaHabra-Huntington Beach via Beach	Local	Minority	26.4	16.4	62.4%	34.2%	42.3%	52.4%	39.8%	33.1%
30	Orangethorpe Avenue	Local	Minority	20.5	12.5	61.1%	47.9%	44.2%	62.0%	42.2%	34.7%
33	Magnolia Street	Local	Minority	15.9	9.5	59.4%	37.7%	36.0%	40.7%	36.7%	28.9%
35	Brookhurst Street	Local	Minority	19.0	12.7	66.6%	50.0%	55.6%	54.6%	47.6%	39.2%
37	Euclid Street	Local	Minority	20.0	16.0	80.1%	54.6%	54.6%	55.9%	45.7%	42.1%
38	La Palma Avenue	Local	Minority	22.0	11.4	51.9%	66.2%	65.7%	69.6%	53.2%	45.5%
42	Seal Beach to Orange via Lincoln	Local	Minority	25.7	14.2	55.3%	63.4%	63.2%	59.6%	64.2%	63.1%
43	Harbor Boulevard	Local	Minority	19.3	14.7	76.1%	59.9%	53.2%	59.8%	48.2%	41.3%
46	Ball Road	Local	Minority	17.1	9.6	56.2%	56.5%	54.5%	58.7%	39.3%	39.8%
47	Anaheim/Haster-Fairview	Local	Minority	22.8	16.1	70.7%	47.6%	57.6%	64.8%	47.3%	51.3%
50	Katella Avenue	Local	Minority	22.5	7.8	34.7%	44.1%	51.8%	49.9%	51.7%	44.4%
53	Main Street	Local	Minority	14.5	10.5	72.2%	47.2%	42.6%	56.0%	52.0%	28.5%
54	Chapman Avenue	Local	Minority	19.3	11.5	59.2%	37.5%	46.6%	46.5%	31.1%	31.1%
55	Santa Ana - Costa Mesa - Newport Beach	Local	Minority	21.4	10.9	51.1%	61.2%	56.3%	62.9%	46.4%	56.1%
56	Garden Grove Boulevard	Local	Minority	16.2	10.8	66.8%	36.8%	38.7%	42.0%	32.9%	24.7%
57	Brea Mall - Newport Transportation Center	Local	Minority	26.1	14.2	54.3%	51.4%	56.3%	63.5%	45.1%	42.9%
59	Anaheim to Irvine	Local	Minority	20.0	14.0	69.9%	67.8%	55.2%	65.2%	29.3%	25.0%
60	Long Beach-Tustin via 17th/Westminster	Local	Minority	25.0	13.6	54.3%	67.8%	58.6%	60.2%	39.2%	36.4%
64	Huntington Beach - Tustin via Bolsa/1st	Local	Minority	12.6	11.4	90.7%	48.9%	57.0%	56.1%	43.4%	43.8%
66	Huntington Beach to Irvine	Local	Minority	17.8	14.6	82.0%	64.4%	64.5%	67.3%	63.3%	60.1%
70	Sunset Beach to Tustin Station	Local	Minority	18.0	11.4	63.3%	51.2%	43.6%	53.2%	46.0%	47.6%
71	Newport Beach-Yorba Linda via Tustin/Red Hill	Local	Minority	24.6	10.3	41.8%	51.2%	50.0%	57.5%	37.8%	34.4%
72	Warner - Tustin Metrolink Station	Local	Minority	16.7	11.4	67.9%	37.3%	32.0%	42.4%	35.1%	23.0%
76	Huntington Beach-JWA via Talbert/MacArthur	Local	Minority	14.2	7.8	54.7%	24.0%	17.6%	26.3%		
79	Tustin - Newport Beach	Local	Minority	19.1	7.4	38.5%	36.5%	46.8%	42.6%	37.7%	28.1%
83	Fullerton - Laguna Hills	Local	Minority	30.5	22.4	73.5%	40.5%	33.1%	42.8%	25.0%	19.5%
86	Costa Mesa - Mission Viejo	Local	Minority	20.5	8.1	39.7%	37.3%	27.0%	35.3%		
123	Huntington Beach - Anaheim	Community	Minority	27.0	12.4	46.1%	34.7%	31.1%	30.5%		
129	La Habra - Anaheim Canyon	Community	Minority	14.1	9.4	66.5%	23.1%	21.0%	30.4%	21.7%	16.9%
143	La Habra - Brea via Fullerton	Community	Minority	14.1	8.6	61.3%	29.6%	29.0%	31.5%	21.6%	15.9%
150	Santa Ana - Costa Mesa	Community	Minority	12.3	12.3	100.0%	52.3%	34.5%	35.6%		
167	Anaheim-Irvine via Santiago/Hewes/Bryan	Community	Minority	24.1	9.7	40.3%	34.2%	31.6%	38.4%		
453	Orange Transportation Center - St. Joseph's Hospital	Stationlink	Minority	30.0	18.0	62.5%	20.5%		15.1%		
472	Tustin Station - Irvine Business Complex	Stationlink	Minority	44.0	21.0	67.7%	25.0%		20.7%		
473	Tustin Station - UCI	Stationlink	Minority	31.0	14.0	68.9%	42.0%		52.0%		
529	Beach Bl Corridor - Rapid Bus	Rapid	Minority	11.2	9.7	86.9%	19.3%	23.2%	26.3%		
543	Harbor Bl Corridor - Rapid Bus	Rapid	Minority	12.7	11.9	93.4%	39.0%	34.8%	53.1%		
553	Main St Corridor Rapid Bus	Rapid	Minority	10.9	9.0	82.4%	29.8%	32.3%	35.3%		
560	7th/Westminster Ave Corridor - Rapid Bus	Rapid	Minority	10.9	10.9	100.0%	30.7%	28.9%	33.4%		
862	Santa Ana Regional Transp. - Civic Center	Shuttle	Minority	2.3	2.3	100.0%	5.1%	3.7%	9.9%	2.7%	0.9%
AVERAGE: MINORITY ROUTES							44.2%	44.3%	48.7%	41.7%	37.8%
NON-MINORITY ROUTES											
1	Pacific Coast Highway	Local	Non-Minority	49.5	2.1	4.3%	41.7%	32.2%	41.7%	32.2%	32.2%
82	Foothill Ranch - Rancho Santa Margarita	Local	Non-Minority	8.7	0.5	6.1%	39.6%	18.3%	39.6%	18.3%	18.3%
85	Mission Viejo - Dana Point	Local	Non-Minority	13.2	0.0	0.0%	14.1%	17.9%	14.1%	17.9%	17.9%
87	Laguna Niguel - Rancho Santa Margarita	Local	Non-Minority	15.4	1.8	11.4%	19.2%	16.6%	19.2%	16.6%	16.6%
89	Laguna Beach - Mission Viejo	Local	Non-Minority	14.4	1.4	9.7%	33.0%	27.8%	33.0%	27.8%	27.8%
90	Tustin Station to Dana Point Harbor	Local	Non-Minority	21.8	3.4	15.5%	44.0%	32.4%	44.0%	32.4%	32.4%
91	Laguna Hills to San Clemente	Local	Non-Minority	22.7	5.0	22.2%	49.1%	38.2%	49.1%	38.2%	38.2%
177	Foothill Ranch - L.H.T.C.	Community	Non-Minority	11.1	1.8	16.1%	20.4%	14.6%	20.4%	14.6%	14.6%
178	Huntington Beach-Irvine via Adams/Birch/Campus	Community	Non-Minority	17.0	1.7	10.1%	22.8%	19.4%	22.8%	19.4%	19.4%
480	Irvine Station - Lake Forest	Stationlink	Non-minority	8.9	2.3	25.4%	19.5%		19.5%		
AVERAGE: NON-MINORITY ROUTES							32.5%	25.6%	32.5%	25.6%	25.6%

Minority persons account for 61.5% of the Orange County population. Minority areas are block groups where minority persons make up 61.5% or more of all persons in each block group. Local bus routes having one-third or more of their service lengths within minority block groups are considered minority bus routes.

Blank cells indicate this route does not operate during that time period.

Exhibit 9: On-Time Performance Analysis

On-Time Performance for Local, Community, Rapid Bus, and Shuttle Routes (May 2024 Service Change)

Route	Route Description	Route Type	Type	Total Route Length (miles)	Route Length (miles) within Minority Area	Percent of Route within Minority Area	On-Time Percentage
MINORITY ROUTES							
25	Fullerton PNR - Huntington Beach	Local	Minority	18.2	8.9	48.8%	79.8%
26	Fullerton PNR - Yorba Linda	Local	Minority	13.6	8.2	60.0%	85.5%
29	LaHabra-Huntington Beach via Beach	Local	Minority	26.4	16.4	62.4%	71.7%
30	Orangethorpe Avenue	Local	Minority	20.5	12.5	61.1%	77.6%
33	Magnolia Street	Local	Minority	15.9	9.5	59.4%	75.3%
35	Brookhurst Street	Local	Minority	19.0	12.7	66.6%	73.5%
37	Euclid Street	Local	Minority	20.0	16.0	80.1%	77.5%
38	La Palma Avenue	Local	Minority	22.0	11.4	51.9%	73.5%
42	Seal Beach to Orange via Lincoln	Local	Minority	25.7	14.2	55.3%	74.2%
43	Harbor Boulevard	Local	Minority	19.3	14.7	76.1%	79.7%
46	Ball Road	Local	Minority	17.1	9.6	56.2%	73.8%
47	Anaheim/Haster-Fairview	Local	Minority	22.8	16.1	70.7%	76.7%
50	Katella Avenue	Local	Minority	22.5	7.8	34.7%	78.3%
53	Main Street	Local	Minority	14.5	10.5	72.2%	85.2%
54	Chapman Avenue	Local	Minority	19.3	11.5	59.2%	83.6%
55	Santa Ana - Costa Mesa - Newport Beach	Local	Minority	21.4	10.9	51.1%	75.2%
56	Garden Grove Boulevard	Local	Minority	16.2	10.8	66.8%	81.2%
57	Brea Mall - Newport Transportation Center	Local	Minority	26.1	14.2	54.3%	74.0%
59	Anaheim to Irvine	Local	Minority	20.0	14.0	69.9%	62.8%
60	Long Beach-Tustin via 17th/Westminster	Local	Minority	25.0	13.6	54.3%	75.9%
64	Huntington Beach - Tustin via Bolsa/1st	Local	Minority	12.6	11.4	90.7%	81.3%
66	Huntingon Beach to Irvine	Local	Minority	17.8	14.6	82.0%	77.9%
70	Sunset Beach to Tustin Station	Local	Minority	18.0	11.4	63.3%	78.9%
71	Newport Beach-Yorba Linda via Tustin/Red Hill	Local	Minority	24.6	10.3	41.8%	74.8%
72	Warner - Tustin Metrolink Station	Local	Minority	16.7	11.4	67.9%	81.3%
76	Huntington Beach-JWA via Talbert/MacArthur	Local	Minority	14.2	7.8	54.7%	89.6%
79	Tustin - Newport Beach	Local	Minority	19.1	7.4	38.5%	82.9%
83	Fullerton - Laguna Hills	Local	Minority	30.5	22.4	73.5%	81.9%
86	Costa Mesa - Mission Viejo	Local	Minority	20.5	8.1	39.7%	79.2%
123	Huntington Beach - Anaheim	Community	Minority	27.0	12.4	46.1%	76.4%
129	La Habra - Anaheim Canyon	Community	Minority	14.1	9.4	66.5%	81.8%
143	La Habra - Brea via Fullerton	Community	Minority	14.1	8.6	61.3%	76.2%
150	Santa Ana - Costa Mesa	Community	Minority	12.3	12.3	100.0%	79.3%
167	Anaheim-Irvine via Santiago/Hewes/Bryan	Community	Minority	24.1	9.7	40.3%	80.1%
529	Beach BI Corridor - Rapid Bus	Rapid	Minority	11.2	9.7	86.9%	85.3%
543	Harbor BI Corridor - Rapid Bus	Rapid	Minority	12.7	11.9	93.4%	78.7%
553	Main St Corridor Rapid Bus	Rapid	Minority	10.9	9.0	82.4%	90.9%
560	7th/Westminster Ave Corridor - Rapid Bus	Rapid	Minority	10.9	10.9	100.0%	86.8%
862	Santa Ana Regional Transp. - Civic Center	Shuttle	Minority	2.3	2.3	100.0%	96.0%
AVERAGE: MINORITY ROUTES							78.6%
NON-MINORITY ROUTES							
1	Pacific Coast Highway	Local	Non-Minority	49.5	2.1	4.3%	75.2%
82	Foothill Ranch - Rancho Santa Margarita	Local	Non-Minority	8.7	0.5	6.1%	84.4%
85	Mission Viejo - Dana Point	Local	Non-Minority	13.2	0.0	0.0%	88.4%
87	Laguna Niguel - Rancho Santa Margarita	Local	Non-Minority	15.4	1.8	11.4%	90.6%
89	Laguna Beach - Mission Viejo	Local	Non-Minority	14.4	1.4	9.7%	80.8%
90	Tustin Station to Dana Point Harbor	Local	Non-Minority	21.8	3.4	15.5%	73.7%
91	Laguna Hills to San Clemente	Local	Non-Minority	22.7	5.0	22.2%	75.7%
177	Foothill Ranch - L.H.T.C.	Community	Non-Minority	11.1	1.8	16.1%	83.8%
178	Huntington Beach-Irvine via Adams/Birch/Campus	Community	Non-Minority	17.0	1.7	10.1%	75.9%
AVERAGE: NON-MINORITY ROUTES							78.8%

Minority persons account for 61.5% of the Orange County population. Minority areas are block groups where minority persons make up 57.6% or more of all persons in each block group. Local bus routes having one-third or more of their service lengths within minority block groups are considered minority bus routes.

Data is for the May 2024 Service Change for the month of May 2024 only.

OTPTitle VI Comparison	
Type	
Minority	78.6%
Non-Minority	78.8%
Systemwide	78.6%

Exhibit 10: Vehicle Assignment Analysis

Average Vehicle Age for Local, Community, Rapid Bus, and Shuttle Routes (May 2024 Service Change)									
Route	Route Description	Route Type	Type	Total Route Length (miles)	Route Length (miles) within Minority Area	Percent of Route within Minority Area	Average Vehicle Age (Years)	Number of Buses	Weighted
1	Pacific Coast Highway	Local	Non-Minority	49.5	2.1	4.3%	0.8	9	6.8
25	Fullerton PNR - Huntington Beach	Local	Minority	18.2	8.9	48.8%	14.2	15	213.6
26	Fullerton PNR - Yorba Linda	Local	Minority	13.6	8.2	60.0%	15.1	9	136.2
29	LaHabra-Huntington Beach via Beach	Local	Minority	26.4	16.4	62.4%	6.5	13	84.9
30	Orangethorpe Avenue	Local	Minority	20.5	12.5	61.1%	14.5	22	319.4
33	Magnolia Street	Local	Minority	15.9	9.5	59.4%	14.8	6	88.8
35	Brookhurst Street	Local	Minority	19.0	12.7	66.6%	14.4	15	215.7
37	Euclid Street	Local	Minority	20.0	16.0	80.1%	2.3	8	18.2
38	La Palma Avenue	Local	Minority	22.0	11.4	51.9%	14.4	21	303.1
42	Seal Beach to Orange via Lincoln	Local	Minority	25.7	14.2	55.3%	14.3	27	387.1
43	Harbor Boulevard	Local	Minority	19.3	14.7	76.1%	3.2	13	41.8
46	Ball Road	Local	Minority	17.1	9.6	56.2%	12.8	16	204.1
47	Anaheim/Haster-Fairview	Local	Minority	22.8	16.1	70.7%	1.1	22	24.7
50	Katella Avenue	Local	Minority	22.5	7.8	34.7%	0.6	14	8.8
53	Main Street	Local	Minority	14.5	10.5	72.2%	0.7	10	6.6
54	Chapman Avenue	Local	Minority	19.3	11.5	59.2%	3.1	9	27.6
55	Santa Ana - Costa Mesa - Newport Beach	Local	Minority	21.4	10.9	51.1%	6.9	11	76.0
56	Garden Grove Boulevard	Local	Minority	16.2	10.8	66.8%	0.8	6	4.7
57	Brea Mall - Newport Transportation Center	Local	Minority	26.1	14.2	54.3%	11.9	34	405.1
59	Anaheim to Irvine	Local	Minority	20.0	14.0	69.9%	11.9	10	118.6
60	Long Beach-Tustin via 17th/Westminster	Local	Minority	25.0	13.6	54.3%	1.1	15	16.2
64	Huntington Beach - Tustin via Bolsa/1st	Local	Minority	12.6	11.4	90.7%	1.9	12	23.2
66	Huntington Beach to Irvine	Local	Minority	17.8	14.6	82.0%	2.4	14	33.8
70	Sunset Beach to Tustin Station	Local	Minority	18.0	11.4	63.3%	9.7	15	146.0
71	Newport Beach-Yorba Linda via Tustin/Red Hill	Local	Minority	24.6	10.3	41.8%	13.5	7	94.2
72	Warner - Tustin Metrolink Station	Local	Minority	16.7	11.4	67.9%	1.2	7	8.5
76	Huntington Beach-JWA via Talbert/MacArthur	Local	Minority	14.2	7.8	54.7%	0.7	3	2.1
79	Tustin - Newport Beach	Local	Minority	19.1	7.4	38.5%	7.6	9	68.8
82	Foothill Ranch - Rancho Santa Margarita	Local	Non-Minority	8.7	0.5	6.1%	7.6	1	7.6
83	Fullerton - Laguna Hills	Local	Minority	30.5	22.4	73.5%	0.7	10	6.8
85	Mission Viejo - Dana Point	Local	Non-Minority	13.2	0.0	0.0%	7.6	2	15.3
86	Costa Mesa - Mission Viejo	Local	Minority	20.5	8.1	39.7%	7.6	3	22.9
87	Laguna Niguel - Rancho Santa Margarita	Local	Non-Minority	15.4	1.8	11.4%	7.6	2	15.3
89	Laguna Beach - Mission Viejo	Local	Non-Minority	14.4	1.4	9.7%	10.3	6	61.5
90	Tustin Station to Dana Point Harbor	Local	Non-Minority	21.8	3.4	15.5%	9.9	7	69.2
91	Laguna Hills to San Clemente	Local	Non-Minority	22.7	5.0	22.2%	7.6	9	68.8
123	Huntington Beach - Anaheim	Community	Minority	27.0	12.4	46.1%	11.9	4	47.8
129	La Habra - Anaheim Canyon	Community	Minority	14.1	9.4	66.5%	14.8	6	87.4
143	La Habra - Brea via Fullerton	Community	Minority	14.1	8.6	61.3%	13.9	4	55.7
150	Santa Ana - Costa Mesa	Community	Minority	12.3	12.3	100.0%	16.2	4	65.0
167	Anaheim-Irvine via Santiago/Hewes/Bryan	Community	Minority	24.1	9.7	40.3%	7.6	4	30.6
177	Foothill Ranch - L.H.T.C.	Community	Non-Minority	11.1	1.8	16.1%	7.6	4	30.6
178	Huntington Beach-Irvine via Adams/Birch/Campus	Community	Non-Minority	17.0	1.7	10.1%	9.2	5	46.0
453	Orange Transportation Center - St. Joseph's Hospital	Stationlink	Minority	30.0	18.0	62.5%	13.6	5	67.8
472	Tustin Station - Irvine Business Complex	Stationlink	Minority	44.0	21.0	67.7%	15.5	4	61.9
473	Tustin Station - UCI	Stationlink	Minority	31.0	14.0	68.9%	15.5	7	108.3
480	Irvine Station - Lake Forest	Stationlink	Non-minority	8.9	2.3	25.4%	15.5	6	92.8
529	Beach BI Corridor - Rapid Bus	Rapid	Minority	11.2	9.7	86.9%	0.0	4	0.2
543	Harbor BI Corridor - Rapid Bus	Rapid	Minority	12.7	11.9	93.4%	0.0	7	0.3
553	Main St Corridor Rapid Bus	Rapid	Minority	10.9	9.0	82.4%	0.9	6	5.3
560	7th/Westminster Ave Corridor - Rapid Bus	Rapid	Minority	10.9	10.9	100.0%	0.0	5	0.2
862	Santa Ana Regional Transp. - Civic Center	Shuttle	Minority	2.3	2.3	100.0%	0.6	6	3.7

Minority persons account for 61.5% of the Orange County population. Minority areas are block groups where minority persons make up 61.5% or more of all persons in each block group. Local bus routes having one-third or more of their service lengths within minority block groups are considered minority bus routes.

Type	Average Vehicle Age (Years)	Number of Buses	Weighted
Minority	8.2	442	3,641
Non-Minority	8.1	51	414
Systemwide	8.2	493	4,055

SECTION 5: SERVICE CHANGES

In accordance with FTA Circular 4702.1B, effective October 1, 2012, transit providers operating 50 or more fixed route vehicles during peak hours of service and serving a population of Urbanized Area (UZA) of 200,000 or greater must evaluate prior performance, and all proposed changes that exceed the transit provider's major service change threshold. The purpose of the evaluation is to determine whether those proposed changes will have a discriminatory impact.

To comply with this FTA requirement, transit providers must adopt the following three policies:

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

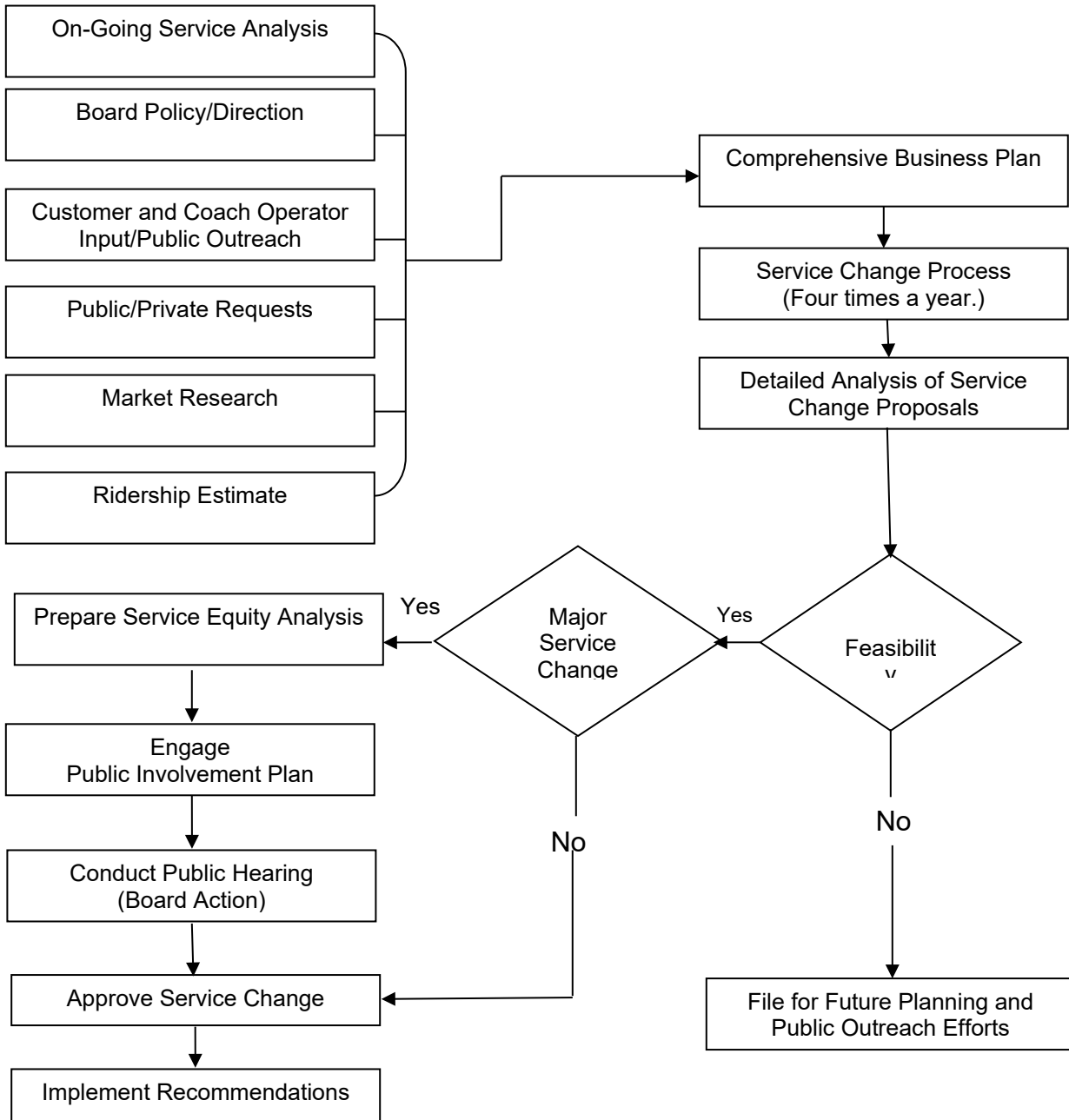
The OCTA Service and Fare Change Evaluation Policy (Policy) defines what actions constitute a major change and are therefore subject to a service or fare Title VI equity analysis prior to implementation. The Policy establishes a threshold for determining when proposed change(s) result in a disparate impact on minority populations and/or a threshold for determining when the proposed change(s) have a disproportional burden borne by a low-income population.

A copy of the Service and Fare Change Evaluation Policy is provided in **Attachment R**, along with meeting minutes for the August 26, 2024 Board meeting, demonstrating the Board had the opportunity to review and approve the Service and Fare Change Evaluation Policy.

Changes in Service

As of February 12, 2023, annual service changes occur four times a year in February, May, August, and November. The major elements of the decision-making process that are utilized in the development of the OCTA service change programs are illustrated below:

Fixed-Route Service & Fare Change Evaluation Process



OCTA is committed to improving bus service for the benefit of all its customers. The chart below lists the service changes and/or fare increases/decreases since the filing of the previous Title VI report in October 2021.

**List of Service & Fare Changes
Since October 2021**

Service Change	Description
October 2021 Service Changes	Major Service Change due to post-COVID service restoration
February 2022 Fare Changes	Major Fare Change, due to the launch of Youth Ride Free Pass beyond promotional phase.
February 2022 Service Changes	Major Service Change due to post-COVID service restoration
June 2022 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
October 2022 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
February 2023 Service Changes	Major Service Change – Phase 1 of the Making Better Connections (MBC) service plan.
May 2023 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
August 2023 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
November 2023 Service Changes	Major Service Change – Phase 2 of the Making Better Connections (MBC) service plan.
February 2024 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
May 2024 Service Changes	Minor Service Change - minor adjustments to bus schedules in response to customer and coach operator input and increase efficiency
August 2024 Service Changes	Major Service Change – Phase 3 of the Making Better Connections (MBC) service plan.

The major service changes in October 2021 and February 2022 were implemented as part of the February 2021 Bus 12-Month Reduction of Service Plan due to the COVID-19 pandemic. The equity analysis, public outreach efforts, and Board meeting minutes approving the service change were provided in OCTA's 2021 Title VI Plan.

Recovering from the pandemic, OCTA undertook a comprehensive study to assess emerging travel trends and the transit network design in Orange County. Known as the Making Better Connections Study, the study evaluated and developed improvements to OC Bus service and route structures to better align with current ridership trends and changing travel patterns

A copy of the equity analysis report, public outreach efforts and signed Board meeting minutes approving the Making Better Connections Service Plan is provided in **Attachments H and I**.

A copy of the February 14, 2022, Board Agenda, public outreach, public hearing held for the Youth Ride Free Pass and Title VI Analysis is provided in **Attachment S**.

CONCLUSION

OCTA is committed to the enforcement of United States DOT Title VI regulations and will provide the most effective and efficient transit services possible, with full accountability to the constituency it serves. Through these established service standards and policies, OCTA will ensure that no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of transit service on the basis of race, color, or national origin and make efforts to alleviate barriers such as language or income to OCTA services, programs, and information.

**OCTA
Title VI Plan Attachments**

OCTA
FTA Fiscal Year 2024 Certifications and Assurances

FEDERAL FISCAL YEAR 2024 CERTIFICATIONS AND ASSURANCES FOR FTA ASSISTANCE PROGRAMS

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

Name of Applicant: Orange County Transportation Authority

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

Or,

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

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

12 Enhanced Mobility of Seniors and Individuals with Disabilities Programs

13 State of Good Repair Grants

14 Infrastructure Finance Programs

15 Alcohol and Controlled Substances Testing

16 Rail Safety Training and Oversight

17 Demand Responsive Service

18 Interest and Financing Costs

19 Cybersecurity Certification for Rail Rolling Stock and Operations

20 Tribal Transit Programs

21 Emergency Relief Program

CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE

AFFIRMATION OF APPLICANT

Name of the Applicant: Orange County Transportation Authority

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

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

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

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

Signature  Date: 3/4/24

Name Lance M. Larson, Executive Director, Government Relations Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Orange County Transportation Authority

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

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

Signature  Date: 3/4/24




Name James M. Donich, General Counsel Attorney for Applicant

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

OCTA
Notification of Protection Under Title VI

Notification of Protection Under Title VI

This is a sample of the interior vehicle permanent placard which includes Title VI information in multiple languages.

NOTIFICATION OF TITLE VI PROTECTION	NOTIFICACIÓN DE PROTECCIÓN BAJO EL TÍTULO VI
<p>Title VI of the Civil Rights Act of 1964 provides that "no person in the United States shall, on the grounds of race, color, nation of origin, limited English proficiency or income status, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."</p> <p>Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin or other protected-class interests may file a written complaint with the Orange County Transportation Authority (OCTA), or the Federal Transit Administration (FTA) within 180 days of the incident. Further, OCTA prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.</p>	<p>El Título VI del Acta de Derechos Civiles de 1964 estipula que "ninguna persona en los Estados Unidos debe, por motivo de su raza, color, origen o nacionalidad, ser excluida de participar, recibir beneficios, o estar sujeta a la discriminación de cualquier programa o actividad que reciba asistencia financiera federal."</p> <p>Cualquier persona que cree que él o ella, individualmente o como miembro de una clase específica de personas, ha sido objeto de discriminación por motivos de raza, color, origen nacional u otros intereses protegidos puede presentar una queja por escrito al Orange County Transportation Authority (OCTA), la Administración Federal del Tránsito (FTA) o la Secretaría de Transporte entre 180 días del incidente. Además, OCTA prohíbe la intimidación, la coerción o la participación en una conducta discriminatoria en contra de cualquiera persona porque él o ella ha presentado una denuncia para garantizar los derechos protegidos por el Título VI.</p>
<p>To request Title VI information or file a complaint, contact 714-636-RIDE – Option 2.</p> <p>Para solicitar información sobre el Título VI (Title VI) o presentar una queja, comuníquese al 714-636-RIDE – opción 2.</p> <p>Để yêu cầu thông tin Tựa Đề VI (Title VI) hoặc nộp đơn than phiền, liên lạc số 714-636-RIDE – Lựa chọn 2.</p>	<p>如需要取第六條款 (Title VI) 有關資訊或使用另一種語言技術，聯繫 714-636-RIDE – 選項二。</p> <p>다른 언어로 타이틀 VI (Title VI) 정보를 요청하시거나 불만 제기를 하시려면 714-636-RIDE(옵션 2)으로 연락해 주십시오.</p> <p>Upang humingi ng Título VI (Title VI) na impormasyon o magsampa ng reklamo sa ibang wikang tawagan ang 714-636-RIDE – Opsyon 2.</p> <p>اب رگهه نابار هم شهالقي چولر. يراب ابو و (Title VI) فم ذانوع ذروه رد. تاعالقا شهراوخ و يراب ذوهوگاب سراموت 714-636-RIDE نالقات مزاجم.</p>
<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: left;">  titlevi-inquiries@octa.net  (714) 636-RIDE – Option 2  octa.net/aboutOCTA/TitleVI </div> <div style="text-align: right;">    <p style="font-size: 0.8em;">OCTA Administrative Offices 600 South Main Street, Orange, CA 92663</p> </div> </div>	

This is a sample of the Title VI Notice of Protection brochure in English and Spanish.

Title VI of the Civil Rights Act of 1964 provides that "no person in the United States shall, on the grounds of race, color, or nation of origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

Our Policy
As a recipient of federal funding, Orange County Transportation Authority (OCTA) assures that all of its services, programs, and activities and that of its sub-recipients, are provided and administered fairly, without regard to race, color, national origin, or economic status. OCTA also makes efforts to prevent discrimination through the impacts of its programs on minority and low-income populations. In addition, OCTA takes reasonable steps to provide meaningful access to programs for persons with limited English proficiency. Further, OCTA prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.



Who May File a Title VI Complaint?
Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin, or other protected class interests may file a written complaint with OCTA or the Secretary of Transportation (DOT).

Procedures for Filing Civil Rights Complaints
A signed complaint must be filed within 180 days after the date of the alleged discrimination. The complainant must include the following information:

- Your name, address, and telephone number, if you are filing on behalf of another person, include their name, address, telephone number and your relationship to the complainant (e.g. friend, caregiver, parent, etc.)
- The name and address of the agency, program or organization that you believe discriminated against you.
- A description of how, why, and when you believe you were discriminated against. Include as much background information as possible about the alleged act(s) of discrimination.
- Your signature.

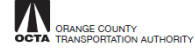
OCTA encourages complaints to be initially filed with the OCTA for resolution but a complaint may be filed with the FTA or DOT.

Who Should I Report My Complaint To?
Complainants may submit a signed written complaint directly to OCTA or to the FTA and/or DOT office(s) identified below:

- Maggie Moulton
Human Resources & Organizational Development
Orange County Transportation Authority
650 South Main Street
P.O. Box 14184
Orange, CA 92668-1584
e-mail: tt6vi-inquiries@octa.net
- Department of Transportation, Office of Civil Rights
Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

If you are unable or incapable of providing a written statement, a verbal complaint or discrimination may be made. Please contact 714-698-RIDE (option 2) and speak with a Customer Relations Representative. The complainant will be interviewed by an appropriate official authorized to receive complaints; if necessary, the official can assist the complainant in converting verbal complaints to writing. Free translation services will be provided to all complainants who have limited English proficiency. All complaints must, however, be signed by the complainant or his/her representative.

For more Title VI information or to download the complaint procedure and printable complaint form, visit our website at www.octa.net/titlevi. Additional Title VI inquiries can be submitted via e-mail at tt6vi-inquiries@octa.net or by contacting the OCTA Customer Relations department by calling 714-698-RIDE (option 2).



SUS DERECHOS DE ACUERDO CON EL TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964

A complaint may be filed in person at the OCTA Headquarters Offices at Orange County Transportation Authority, 650 South Main Street, Orange, CA 92668



El Título VI de la Ley de Derechos Civiles de 1964 establece que "ninguna persona en los Estados Unidos, por motivos de raza, color u origen, será excluida de la participación, se le negarán beneficios, ni estará sujeta a discriminación en ningún programa o actividad que reciba asistencia financiera federal".

Nuestra Política
Como beneficiario de financiamiento federal, Orange County Transportation Authority (OCTA) asegura que todos sus servicios, programas y actividades, y las de sus sub-beneficiarios, se brindan y administran de manera justa, sin importar raza, color, origen ni situación económica. OCTA también se esfuerza por evitar la discriminación a través del impacto de sus programas sobre comunidades minoritarias y de bajos recursos. Además, OCTA toma medidas razonables para brindar acceso importante a programas a personas con un dominio limitado del inglés. OCTA también prohíbe la intimidación, la extorsión o la vinculación en otras conductas discriminatorias contra cualquier persona que haya presentado una reclamación para asegurar los derechos amparados por el Título VI.



¿Quién Puede Presentar una Reclamación en Relevo con el Título VI?
Cualquier persona que crea que ella en particular o como miembro de un grupo específico de personas, ha sido víctima de discriminación por su raza, color, origen u otro interés de clases protegidas, puede presentar una reclamación por escrito ante OCTA o la Secretaría de Transporte (Secretary of Transportation (DOT)).

Procedimientos Para la Presentación de Quejas de Derechos Civiles

Se debe presentar una reclamación por escrito y firmada dentro de los 180 días luego de la fecha de la supuesta discriminación. La reclamación debe contener la siguiente información:

- Su nombre, dirección y número telefónico. Si usted presenta la reclamación en nombre de otra persona, incluya el nombre, dirección, número de teléfono de dicha persona y su relación con ella (por ejemplo, amigo, cuidador, padre, etc.).
- El nombre y dirección de la agencia, programa u organización que usted cree que lo discriminó.
- Descripción de cómo, por qué y cuándo usted cree que se le discriminó. Incluya la mayor cantidad de información de respaldo posible sobre el/los supuesto/s acto/s de discriminación.
- Su firma.

OCTA insiste que quejas deben ser inicialmente presentadas con el OCTA para su resolución, sino una queja puede ser presentada con el FTA o DOT.

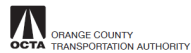
¿A Quién Debo Informar Sobre Mi Reclamación?

Los demandantes deben presentar una reclamación por escrito y firmada directamente ante OCTA, o ante la oficina/s de la FTA y/o la DOT que se identifiquen a continuación:

- Maggie Moulton
Human Resources & Organizational Development
Orange County Transportation Authority
650 South Main Street
P.O. Box 14184
Orange, CA 92668-1584
Dirección de correo electrónico: tt6vi-inquiries@octa.net
- Department of Transportation, Office of Civil Rights (Departamento de Transporte, Oficina de Derechos Civiles)
Title VI Program Coordinator (Coordinador del Programa del Título VI)
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Si usted no puede o es incapaz de presentar una declaración por escrito, se puede hacer una reclamación oral sobre la discriminación. Comuníquese al 714-698-RIDE (opción 2) y hable con un Representante del Servicio de Atención al Cliente. El demandante será entrevistado por el empleado correspondiente autorizado para recibir reclamaciones. En caso de ser necesario, el empleado puede ayudar al demandante a convertir las reclamaciones orales en escritas. Se brindarán servicios gratuitos de traducción a todos los demandantes que tengan dominio limitado del inglés. Sin embargo, todas las reclamaciones deben ser firmadas por el demandante o su representante.

Para más información sobre el Título VI o para descargar el procedimiento de reclamaciones y el formulario de reclamaciones para imprimir, visite nuestro sitio de Internet www.octa.net/titlevi. Si tiene más preguntas sobre el Título VI, puede enviarlas por correo electrónico a tt6vi-inquiries@octa.net o llamar al departamento de atención al cliente de OCTA al 714-698-RIDE (opción 2).



YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Puede presentar una reclamación en persona en las oficinas centrales de OCTA en Orange County Transportation Authority, 650 South Main Street, Orange, CA 92668



This is a sample of an OCTA bus book which includes Title VI protection information in English and Spanish.

INFORMATION

QUESTIONS AND HOURS OF OPERATION

OC Bus is here to help. If you have questions or concerns you can always call the OC Bus Customer Information Center at 714-636-RIDE (7433). Bilingual operators are available to help. Hours of operation are noted to the right.

	Mon-Fri	Sat/Sun	Holidays
Trip Planning	7-7	8-6	8-5
Customer Service	8-5	Closed	Closed
Pass Sales	8-2	Closed	Closed

CONTACTING US

If you have comments, concerns, or suggestions about OC Bus service, contact Customer Relations by:

E-mail: customers@octa.net

Web: octa.net/comment

Phone: Monday – Friday
from 8am to 5pm
714, 949 or 800-636-RIDE
(7433), extension 2

Mail: P.O. Box 14184
Orange, CA 92863

ACCESS SERVICE

ACCESS service is OCTA's paratransit service for persons with a disability resulting in functional limitations that prevent them from using the regular bus system. In order to use the service, you must schedule an ACCESS in-person assessment, please call ACCESS Eligibility at 714-560-5956 Ext. 2, and meet the Americans with Disabilities Act (ADA) criteria.

Reserving ACCESS

To reserve or cancel an ACCESS trip, check on the status of a ride, or for general ACCESS information, call ACCESS at:

877-OCTA-ADA (628-2232)

TDD phone for the hearing impaired
800-564-4ADA (4232)

ACCESS Information is also available at octbus.com.

ACCESS Phone Hours

Monday through Friday
7:00 a.m. – 5:00 p.m.

Saturday, Sunday and Holidays
8:00 a.m. – 5:00 p.m.

For information about older adult programs and services, contact the Office on Aging Information and Assistance Call Center at 800-510-2020 or 714-567-7500. Or visit their website at officeonaging.ocgov.com

CALIFORNIA SERVICE DOG FRAUD LAW

If someone attempts to pose a regular pet as a service dog, the maximum penalty is a \$1,000 fine and up to six months in jail.
• Penal code 366.7

NOTIFICATION OF TITLE VI PROTECTION

Title VI of the Civil Rights Act of 1964 provides that "no person in the United States shall, on the grounds of race, color or nation of origin, be excluded from participation in, be denied the benefits of or be subjected to discrimination under any program or activity receiving federal financial assistance."

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin or other protected-class interests may file a written complaint with the Orange County Transportation Authority (OCTA), the Federal Transit Administration (FTA) or the Secretary of Transportation. Further, OCTA prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.

To file a complaint in writing or to request more information contact:

E-mail: TitleVI-Inquiries@octa.net

Customer Relations: 714-636-RIDE (7433)

Web: octa.net

Hearing Impaired: 714-636-HEAR (4327) TDD

OCTA LOST & FOUND

Address:
11903 Woodbury Road
Garden Grove, CA 92843
Phone: (714) 560-5934
Hours:
Mon – Thurs: 8:00 a.m. – 12:30 p.m. & 1:30 p.m. – 4:00 p.m.
Friday Pickup by appointment only

Build an ebusbook at ocbus.com/ebusbook

INFORMACIÓN

PREGUNTAS Y HORAS DE OPERACIÓN

OC Bus está aquí para ayudarle. Si usted tiene preguntas o preocupaciones, usted siempre puede llamar a la OC Bus Centro de Información al Cliente al 714-636-Ride (7433). Los operadores bilingües están disponibles para contestar sus preguntas. Las horas de operación se observan a la derecha.

	Mon-Fri	Sat/Sun	Holidays
Planificación de viaje	7-7	8-6	8-5
Servicio de atención al cliente del pase	8-5	cerrado	cerrado
Ventas del pase	8-2	cerrado	cerrado

CONTACTE CON NOSOTROS

Si tiene comentarios, algún problema o sugerencia acerca de nuestro servicio, póngase en contacto con El Departamento de relaciones con los clientes por:

Correo Electrónico: customers@octa.net

La Web: octa.net/comment

Teléfono: Lunes - Viernes de 8am a 5pm
714, 949 or 800-636-RIDE (7433),
extension 2

Correo: P.O. Box 14184
Orange, CA 92863

POLÍTICA DE CONDUCTA DEL CLIENTE

La conducta violenta, ilegal o disyuntiva no será tolerada a bordo del vehículo. Los infractores serán perseguidos con todo el rigor de la ley, de acuerdo con:

• Código Penal Secciones 171.7, 594, 640, 640.5 y 16.590

• Código de Servicios Públicos de las Secciones 99155 y 99170

• Código de Vehículos de la Sección 407.5

Para obtener más información, visite ocbus.com/customerconduct

POLÍTICA DE SERVICIO AL CLIENTE

La Autoridad de Transporte del Condado de Orange (OCTA) se compromete a proporcionar servicios seguros, fiables, amables, accesibles y fáciles de usar para sus clientes. Para garantizar la calidad y la equidad, la OCTA hará modificaciones razonables a sus políticas, prácticas y procedimientos, cuando sea necesario, para evitar la discriminación por motivos de discapacidad o cuando la persona con discapacidad, de otro modo no podrá utilizar los servicios de OCTA, programas o actividades.

Para obtener información adicional acerca de las solicitudes de modificación

razonables, por favor visite: ocbus.com/reasonablemodification.

SERVICIO ACCESS

El servicio ACCESS es el servicio de paratransito de OCTA para personas con una incapacidad (debido a limitaciones funcionales) que no pueden usar el sistema regular del autobús. Para poder utilizar este servicio, deberá hacer una cita de evaluación en persona con ACCESS. Favor de llamar a la línea de elegibilidad de ACCESS al 714-560-5956 Ext. 2, y cumplir los criterios del Acta de Americanos Discapacitados (ADA, Americans with Disabilities Act).

Reservado con ACCESS

Para reservar o cancelar un viaje ACCESS, comprobar el estado del viaje, para obtener información general sobre ACCESS, llame a ACCESS al número: 877-OCTA-ADA (628-2232)
Teléfono TDD para los discapacitados auditivos: 800-564-4ADA (4232)
Solicitudes también disponibles en www.octa.net

Información y Horas de Reservación

Lunes a Viernes 7:00 a.m. – 5:00 p.m.
Sábados, Domingos y Días Feriados
8:00 a.m. – 5:00 p.m.

Para consultar la información sobre servicios y programas para adultos mayores, póngase en contacto con la Oficina de Información y Asistencia para Adultos Mayores (Office on Aging Information and Assistance) al 800-510-2020 ó 714-567-7500. Puede también visitar su sitio web en www.officeonaging.ocgov.com

NOTIFICACIÓN DE PROTECCIÓN BAJO EL TÍTULO VI

El Título VI del Acta de Derechos Civiles de 1964 estipula que "ninguna persona en los Estados Unidos debe, por motivo de su raza, color, origen o nacionalidad, ser excluida de participar, recibir beneficios, o estar sujeta a la discriminación de cualquier programa o

actividad que reciba asistencia financiera federal."

Cualquier persona que cree que él o ella, individualmente o como miembro de una clase específica de personas, ha sido objeto de discriminación por motivos de raza, color, origen nacional u otros intereses protegidos puede presentar una queja por escrito al Orange County Transportation Authority (OCTA), la Administración Federal del Transporte (FTA) o la Secretaría de Transporte. Además, OCTA prohíbe la intimidación, la coerción o la participación en una conducta discriminatoria en contra de cualquiera persona porque él o ella ha presentado una denuncia para garantizar los derechos protegidos por el Título VI.

Para presentar una denuncia por escrito o solicitar más información, contactar a:

Correo Electrónico: TitleVIInquiries@octa.net

Customer Relations: 714-636-RIDE (7433)

La Web: octa.net

Personas con problemas auditivos: 714-636-HEAR (4327) TDD

EL FRAUDE DE PERROS DE SERVICIO

Según la ley de California, faltar que un perro es un animal de servicio entrenado es un delito punible con hasta seis meses de prisión y lo una multa de hasta \$1000.
• Código Penal 365.7

OBJETOS PERDIDOS DE OCTA

Dirección:
11903 Woodbury Road
Garden Grove, CA 92843
Teléfono: (714) 560-5934

Horas:
Lunes a Jueves: 8:00 a.m. - 12:30 p.m. y 1:30p.m. - 4:00p.m.

Viernes: Se puede recoger pero solo con cita

Build an ebusbook at ocbus.com/ebusbook

This is a sample of an OCTA bus stop sign which includes Title VI protection information in English and Spanish.

NB EB SAN NICOLAS
FS NEWPORT CENTER EAST 1 S 500 55 S 910

STOP 5084

MAPS & SCHEDULES

1 South to San Clemente
Sur a San Clemente

55 South to Newport Beach
Sur a Newport Beach

REAL-TIME INFORMATION

TRANSIT APP
Get real-time information to plan & track your trip and view arrival & departure times.
Download now!

TEXT 4 NEXT
Get real-time information sent via text to your phone. Text the stop and route number to **628246**. You'll receive the next three arrival times for the route at that stop. Text **HELP** for more information.

CUSTOMER INFORMATION CENTER
Get real-time information by calling **714-636-RIDE**.

MOBILE PASSES

OC BUS MOBILE APP
Take advantage of your smartphone's payment features and plan, pay and ride with ease.
Download now!

ESPAÑOL / TIẾNG VIỆT

Escanear para información de pasajero en español.

Quét mã để đọc thông tin cho người sử dụng bằng tiếng Việt.

Title VI prohibits discrimination on the basis of race, color and national origin. If you feel you have been subjected to discrimination under Title VI you may file a complaint by contacting OCTA Customer Relations at 714-636-RIDE or at octa.net.
El Título VI prohíbe la discriminación por motivo de raza, color y nacionalidad. Si siente que ha sido sujeto a algún tipo de discriminación de acuerdo con el Título VI, puede presentar una queja comunicándose con el Servicio al Cliente de OCTA al 714-636-RIDE (7433) o en www.octa.net.
Tiêu Đê VI ngăn cấm sự kỳ thị dựa trên sắc tộc, màu da và nguồn gốc quốc gia. Nếu bạn cảm thấy mình đã là đối tượng của sự kỳ thị chiếu theo Tiêu Đê VI, bạn có thể nộp đơn khiếu nại bằng cách tiếp xúc với Văn Phòng Quản Lý Khách Hàng OCTA theo số 714-636-RIDE hoặc octa.net.

OCBUS OCbus.com

This is a sample of an OCTA Transportation Center Informational Kiosk which includes Title VI protection information in English and Spanish.

Fullerton Transportation Center

Connecting Bus Service

Nearby Destinations

- A Downtown Fullerton
- B Fullerton College
- C Cal State Fullerton
- D Hope International University

Effective June 2024.

- 26**
FULLERTON – YORBA LINDA
via Commonwealth Ave / Yorba Linda Blvd
- 43**
FULLERTON – COSTA MESA
via Harbor Blvd
- 47**
FULLERTON – NEWPORT BEACH
via Anaheim Blvd / Fairview St
- 143**
LA HABRA – BREA
via Whittier Blvd / Harbor Blvd / Brea Blvd / Birch St
- 543**
FULLERTON – SANTA ANA
via Harbor Blvd
- TRANSIT APP**
Get real-time departure times for nearby routes, plan your trip, and view service alerts. Download now!
- OC BUS MOBILE APP**
Take advantage of your smartphone's payment features and plan, pay and ride with ease. Download now!

Title VI prohibits discrimination on the basis of race, color and national origin. If you feel you have been subjected to discrimination under Title VI you may file a complaint by contacting OCTA Customer Relations at 714-636-RIDE or at ocbus.com.

El Título VI prohíbe la discriminación por motivo de raza, color y nacionalidad. Si siente que ha sido sujeto a algún tipo de discriminación de acuerdo con el Título VI, puede presentar una queja comunicándose con el Servicio al Cliente de OCTA al 714-636-RIDE (7433) o en ocbus.com.

Stop Human Trafficking
If you or someone you know is being forced to engage in any activity and cannot leave – whether it is commercial sex, housework, farm work, construction, factory, retail or restaurant work or any other activity – text 233-733 (Be Free) or call the National Human Trafficking Hotline at 1-888-373-7888.

No a la Trata de Personas
Si a usted, o a alguien que conoce, lo están forzando a hacer algo y no lo dejan ir – ya sea sexo por dinero, trabajo de hogar, de campo agrícola, construcción, fábrica, en una tienda minorista o restaurante, o cualquier otra actividad – envíe un texto 233-733 (Be Free) o llame a la Línea Nacional Contra la Trata de Personas (National Human Trafficking Hotline) al 1-888-373-7888.

Routes are subject to change. Please visit ocbus.com for detailed route schedule.

Ocbus.com

**OCTA
Title VI Complaint Procedure Tracking and
Investigating**

**Orange County Transportation Authority
Title VI Complaint Procedure
Tracking and Investigating**



It is the policy of Orange County Transportation Authority (OCTA) to employ its best efforts to ensure that all programs, services, activities, and benefits are implemented without discrimination. OCTA follows complaint investigation and format procedures which are in keeping with Title VI requirements. This is OCTA's procedure for tracking and investigating complaints alleging discrimination on the basis of race, color, or national origin.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin, may file a written complaint with OCTA, the Federal Transit Administration (FTA), or the Secretary of Transportation (DOT). Further, OCTA prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.

A complaint must be filed within 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary of Transportation or FTA. Complaints may be filed online at octa.net/contact/customer-comment-form/, emailed to titlevi-inquiries@octa.net, verbally via OCTA's Customer Service Department 714-636-RIDE, or in person at OCTA's administrative office. OCTA encourages complaints to be initially filed with OCTA for resolution. However, in those cases where the complainant is dissatisfied with the resolution by OCTA, the same complaint may be submitted to the FTA or the Secretary of Transportation for investigation.

Written complaints may also be mailed to OCTA directly, or the FTA and Secretary of Transportation offices identified below:

Orange County Transportation Authority:

Maggie McJilton
Executive Director, People and Community Engagement
Federal Compliance Officer
600 South Main St.
Orange, CA 92868

Federal Transit Administration:

Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Federal Highway Administration

U.S. Department of Transportation
Attention: Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590

The complaint information should include the date of the alleged act of discrimination, when the complainant(s) became aware of the alleged action of discrimination; or the date on which that conduct was discounted or the latest instance of conduct.

Complainants should present a detailed description of the issue(s), including the name(s) and job title(s) of those individual(s) perceived as parties in the complaint. The allegation must involve discrimination

**Orange County Transportation Authority
Title VI Complaint Procedure
Tracking and Investigating**



on the grounds of race, color or national origin. Allegations must involve an OCTA service, program or activity of a federal-aid recipient, sub-recipient or contractor.

In cases where the complainant is unable or incapable of providing a written statement but wishes OCTA to investigate the alleged discrimination, a verbal complaint of discrimination may be made. The complainant will be interviewed by an appropriate representative authorized to receive complaints. If necessary, the representative will assist the complainant in converting verbal complaints to writing. Translation services will be provided to all complainants, as necessary.

Information for filing a Title VI complaint can be accessed on the OCTA website at www.octa.net or by contacting the OCTA Customer Relations Department at 714-636-RIDE (multi-lingual translation services are available). E-mail inquiries or initial complaints can be sent directly to the OCTA Office of Civil Rights at titlevi-inquiries@octa.net.

Complaint Format:

- Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
- OCTA will provide the complainant or his/her representative with a written acknowledgment that OCTA has received the complaint within ten working days.

Tracking Complaints:

- The following complaint information will be tracked on the OCTA Title VI Complaint/Investigation log by the Office of Civil Rights in the People and Community Engagement Division:
 1. Date the complaint was received by the OCTA Office of Civil Rights
 2. Date an acknowledgment letter was sent to the complainant
 3. Entity
 4. Protected category
 5. Program/Activity/Service
 6. Summary of the allegation
 7. Status of the complaint
 8. Was the complaint investigated – yes/no
 9. Action Taken
 10. The response letter was sent to the complainant - action taken

Determination of Investigative Merit:

OCTA will begin an investigation within fifteen (15) working days of receipt of a valid complaint. A complaint shall be regarded as meriting investigation unless:

- It clearly appears on its face to be frivolous or trivial.
- Within the time allotted for making the determination of jurisdiction and investigative merit, the party complained against voluntarily concedes noncompliance and agrees to take appropriate remedial action.

**Orange County Transportation Authority
Title VI Complaint Procedure
Tracking and Investigating**



- Within the time allotted for making the determination of jurisdiction and investigative merit, the complainant withdraws the complaint; or
- Other good cause for not investigating the complaint exists (e.g. respondent is presently under investigation by another Federal agency).

Request for Additional Information from Complainant and/or Respondent:

In the event that the complainant or respondent has not submitted sufficient information to make a determination of jurisdiction or investigative merit, OCTA may request additional information from either party. This request shall be made within 15 working days of the receipt of the complaint and will require that the party submit the information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated time frame may be considered good cause for a determination of no investigative merit. Failure of respondent to submit additional information within the designated time frame may be considered good cause for a determination of noncompliance.

Investigative Report:

OCTA will complete an investigation within ninety (90) days of receipt of the complaint. If additional time for the investigation is needed, the complainant will be contacted. A written report will be prepared by the responsible investigator at the conclusion of the investigation. The investigative report will include the following:

- Summary of the complaint, including a statement of the issues raised by the complainant and the respondent's reply to each of the allegations, citations of relevant Federal, State, and Local Laws, rules, regulations, and guidelines, etc.
- Description of the investigation, including a list of the persons contacted by the investigator and a summary of the interviews conducted; and a statement of the investigator's findings and recommendations. A closing letter will be provided to the complainant.

OCTA Timeline Requirements:

Signed complaint filed with the OCTA Office of Civil Rights	180 days
OCTA written acknowledgement from date of receipt	10 days
Begin investigation	15 days
Request for additional information from complainant(s)	15 days
Submit additional information	60 days
Complete investigation	90 days

Recordkeeping Requirements:

The OCTA Civil Rights Compliance Officer will ensure that all records relating to the OCTA Title VI Complaint Process are maintained with the department records for seven years as of the date of the complaint.

Records will be available for compliance review audits.

**OCTA
Title VI Complaint Form**



Title VI Complaint Form
Orange County Transportation Authority (OCTA)
Office of Civil Rights

Title VI of the Civil Rights Act of 1964 provides that "no person in the United States shall, on the grounds of race, color or nation of origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

It is the policy of OCTA to employ its best efforts to ensure that all programs, services, activities, and benefits are implemented in a non-discriminatory manner.

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint within 180 days from the date of the alleged discrimination with OCTA, the Federal Transit Administration (FTA), or the Secretary of Transportation. Further, OCTA prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.

Please provide the following information:

Complainant Name:	Phone Number:	
Complainant Street Address:		
City:	State:	Zip Code:
Person(s) discriminated against (if someone other than complainant):		
Person(s) discriminated against (if other than Complainant) Street Address:		
City:	State:	Zip Code:

Date of Incident: _____

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

Race

Color

National Origin

If you are unable or incapable of providing a written statement, but wish OCTA to investigate alleged discrimination; a verbal complaint of discrimination may be made. Please contact **714-636-RIDE** and speak with a Customer Relations Representative. The complainant will be interviewed by an appropriate official authorized to receive complaints. If necessary, the official will assist you in converting verbal complaints to writing. Translation services will be provided to all complainants, as necessary.

Please describe the alleged discrimination incident. Provide the name(s) and job title(s) of all OCTA employees involved, if available. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

Please email your complaint form to titlevi-inquiries@octa.net or mail your complaint form directly to OCTA to the following address:

Maggie McJilton
Executive Director, People and Community Engagement
Federal Compliance Officer
600 South Main Street
Orange, CA 92863

Have you filed a complaint with any other federal, state, or local agency? (Circle one) Yes/No

If you answered yes, please provide the following information for each agency a complaint was submitted to:

Agency	Contact Person
Street Address, City, State, Zip Code	
Agency	Contact Person
Street Address, City, State, Zip Code	

In addition to utilizing the Civil Rights complaint process at OCTA, a Complainant may file a Title VI complaint with the Federal Transit Administration Office of Civil Rights for complaints related to OCTA's fixed route service or the Department of Transportation in Washington, D.C. for complaints related to FHWA funded projects:

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 205901200

Federal Highway Administration
U.S. Department of Transportation
Attention: Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590

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

Complainant's Signature

Date

**OCTA
Title VI Complaint Tracking**

Title VI Complaint Tracking 2021 - 2024

Date Received	Date Acknowledged	Entity	Protected Category	Program Activity	Summary	Status	Investigation Y/N	Action	Response
9/1/2021	9/9/2021	Public	Race/Color/ National Origin	ACCESS	Passenger uses a wheel chair and has an OCTA disabled pass. Passenger stated that he was forced to board the bus from the front rather than using the back door with a ramp and in turn injured his left ankle. ACCESS taxis that are sent to pick up passenger cannot secure the wheelchair.	Closed	N	No investigation conducted. Requested additional information from complainant, but did not receive additional information.	N/A
9/22/2021	9/22/2021	Public	Race/Color	ACCESS	Passenger alleged he has been discriminated against by OC ACCESS drivers and OCTA staff due to his color.	Closed	Y	Reviewed complaint data and incident/witness statements received from Customer Service and found allegations to be false. Reviewed OC ACCESS suspensions and hearings and found OCTA actions were warranted.	10/8/21 via Certified Mail
3/3/2022	3/8/2022	Public	Race	Service	Passenger alleged he has been discriminated against on fixed route service, because minority driver did not ask minority passengers to move from the front seats (reserved for disabled riders) of the bus to allow passenger to sit down.	Closed	Y	Bus surveillance footage reviewed and the allegation was false.	3/18/22 via Certified Mail
4/6/2022	4/7/2022	Public	Race	Service	Passenger alleged he was discriminated against on fixed-route service due to his race and color.	Closed	Y	Video surveillance was unavailable due to the incident occurring six months ago. Identified Operator on route at that date/time and he they not fit description of the complaint. Interviewed Operator and they did not recall the incident. Checked with customer service and they did not receive a complaint regarding this incident.	6/15/22 via Certified Mail
4/15/2024	4/23/2024	Public	Race/Color	ACCESS	Passenger alleged he continues to get abandoned by ACCESS.	Closed	N	No investigation conducted. Requested additional information from complainant, but did not receive additional information.	N/A

OCTA
2024 Public Involvement Plan

Orange County Transportation Authority

Public Involvement Plan



Strategies and Methods for Promoting Public Involvement

People and Community Engagement Division
Office of Civil Rights

July 2024

OCTA Public Involvement Plan

Purpose

The Orange County Transportation Authority (OCTA) Public Involvement Plan (PIP) establishes procedures that allow for, encourage, and monitor participation of all direct stakeholders in the OCTA service area including, but not limited to, low-income, hard-to-reach, diverse individuals and those with limited English proficiency (LEP)¹. This document describes proactive strategies, procedures, and desired outcomes to seek out and consider the needs and input of the general public, and to engage them in planning and decision-making activities at OCTA.

In developing the PIP, OCTA analyzed the demographic population for diverse, low-income, and LEP segments, as well as the steps required to incorporate these often underserved segments. Hard copies of the PIP will be available at the OCTA main office upon request. Electronic versions of the document will be available on the OCTA.net website.

Goals and Objectives of the Public Involvement Plan

The goal of the PIP is to offer a variety of opportunities for the general public to engage in the planning and decision-making activities at OCTA in accordance with Federal Transit Administration (FTA) circular C 4702.1B Chapter III-5 *Promoting Inclusive Public Involvement* and the National Cooperative Highway Research Program Report 710 *Practical Approaches for Involving Traditionally Underserved Populations in Transportation Decision making*.

Objectives:

- To determine what non-English languages and other cultural barriers may exist to public participation within the Orange County area;
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area;
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income, hard-to-reach and diverse members of the public;
- To provide avenues for two-way flow of information and input from populations which are typically not likely to attend such meetings;
- To provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program;
- To use various illustrative visualization techniques to convey the information, including, but not limited to, charts, graphs, photos, maps, and the OCTA website.

¹ OCTA defines an LEP person as those individuals limited by the ability to speak English less than “not very well” or “not at all” as reported by the U.S Census Bureau.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by a plan, project or the recommendations of that plan or project. Those who may be adversely affected or who may be denied benefit of a plan's recommendation(s) are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general publics, diverse, low- income, public agencies, non-profit organizations and businesses.

Direct Stakeholders

General: According to the 2021 U.S. Census Bureau population estimates, there are 3,167,809 residents in the Orange County Area. Approximately 85 percent of residents over the age of five speak English, including those that speak only English or those that reported they spoke English “very well.”

Some of the techniques that can be used to engage the general population are public notices of meetings in the local newspapers and open house format public information meetings. While these techniques will continue, staff is making a greater effort to engage the general public, possibly with techniques such as nominal group exercises, surveys, participation in community events, and use of local and ethnic news media, etc.

Diverse Populations: According to the U.S. Census Bureau 2021 population estimates, diverse populations comprise almost half of the percentage of the population in the Orange County area (See Table 1). Hispanics are the largest diverse population, with more than 34 percent of the total population of Orange County. Black and Asian persons account for 1.7 percent and 21.9 percent of the population, respectively. There are also a small number of American Indian/Alaska natives and Hawaiian/Pacific Islander individuals, accounting for less than 1 percent each. Persons who consider themselves to be of more than one race account for approximately 4 percent of the population.

TABLE 1
Orange County Area Population

Race / Ethnicity	Population Estimate¹	Population Percentages
White	1,191,185	37.6%
Hispanic or Latino (of any race)	1,080,593	34.1%
Asian	693,396	21.9%
Two or more races	125,736	4.0%
Black or African American	52,572	1.7%
Some other race	13,003	0.4%
Native Hawaiian and Other Pacific Islander	7,709	0.2%
American Indian and Alaska Native	3,615	0.1%
Total	3,167,809	100.0%

¹ DP05 ACS Demographic and Housing Estimates / B03002 Hispanic or Latino Origin by Race
Source: U.S. Census Bureau, 2021 American Community Survey 1-Year Estimate

Limited-English Proficiency: Engaging LEP populations can initially appear to be challenging. Language and cultural differences may not be compatible with the more traditional means of engaging the public in the planning process. OCTA will make reasonable efforts to engage LEP populations using techniques such as including notations in public notices in appropriate non-English languages that will provide contact where individuals can be informed of the process/project and will have the opportunity to give input. Focus groups may also be established for the purpose of gaining input from a particular defined portion of the community. Also, non-profit organizations and advocacy groups can be a good resource for contacts and dissemination of information to LEP populations. Such non-profit organizations, advocacy groups, or agencies can have insight into the needs of the under-represented populations, as well as providing valuable contacts for arenas for input.

Low-Income: According to the 2021 U.S. Census Bureau Population Estimates, low-income households are classified as below poverty “if their total family income or unrelated individual income was less than the poverty threshold specified for the applicable family size, age of householder, and number of related children under 18 present.” Low-income households account for 14.3 percent of all households in the Orange County area, while 9.9 percent of the population is actually below the poverty level. To ensure low-income segments are not under-served, OCTA has identified the service area segments with a per capita income of 80 percent or less of the national average in order to establish low-income thresholds. Low-income population in the Orange County area should be given every reasonable opportunity to provide input on transportation plans and programs to avoid disproportionate harm, or lack of benefit, of transportation programs and projects. Consideration should be given to the correlation between low-income and illiteracy when developing effective means of communication. While low-income, hard-to-reach individuals may have access to all of the traditional means of public involvement, discussed under "general public," they may be less likely to become involved or offer input. Some methods of gaining input either directly or indirectly from this portion of the population include focus groups, informal interviews, and agency/advocacy group contacts.

Indirect Stakeholders

Non-Profit Organizations/Public Agencies: Non-profit organizations and public agencies can provide valuable input to the planning process in addition to assisting in gaining participation from traditionally under-represented populations². Pertinent public agencies include those that have clients who fall into under-represented populations, including, but not limited to minorities, low-income, hard-to-reach and LEP households. These agencies have great insight into the needs of their clients and are useful partners in overcoming difficult barriers that may not be understood by professionals dealing more distinctly with the provision of proposed program or project services.

Private Organizations and Businesses: Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often transportation

for employees is of critical concern to private sector employers. For that reason, representation of private business interests will be welcomed in the planning process.

Community Based Organizations:

Public Involvement Plan

This document will serve as the PIP for the OCTA. Availability of the policy for review will be advertised in a manner reasonably expected to reach the general public, as well as diverse populations, low-income persons, and other traditionally under-served and hard-to-reach populations before the document goes into effect. This could occur through contacts mentioned earlier in this document, with notification of contacts available in English, Spanish, Vietnamese, Braille and other languages upon request, in addition to traditional public notices in local newspapers.

Public involvement is important at all stages of plan development. Opportunities for participation for both users and non-users of the OCTA programs, service, projects and activities will be available. Members of the public can obtain information about the process from or submit input to OCTA at:

Orange County Transportation Authority
Title VI Coordinator – 9th Floor
550 S. Main Street
P.O. Box 14184
Orange, CA 92863-1584

Other stages of the planning process, such as reviewing draft documents and mapping, are more conducive to other techniques. Documents will be available for review at the OCTA administrative offices, located at 550 S. Main Street in Orange, California, and on OCTA webpage, www.octa.net. If materials are requested in other languages, large type, and/or Braille, staff will make a reasonable attempt to accommodate those needs.

Other techniques may also be determined useful at other stages of the process, and new and different techniques will be utilized, as deemed appropriate, to engage public participation.

Outreach Efforts

In addition to the outreach efforts identified earlier in this plan, OCTA's People and Community Engagement Division staff will use the following public engagement techniques for its capital projects, planning studies, and public committees as deemed appropriate by OCTA People and Community Engagement Division staff and the Orange County Transportation Authority:

Capital Projects:

Traditionally under-represented populations include but are not limited to minorities, low-income, and LEP households. Some or all of the following procedures, strategies, techniques, and media will be utilized to engage the public in the decision-making and planning process for all capital programs:

- Presentations to professional, civic, student, community and faith-based organizations, as well as local agencies.
- Articles in print and digital community newsletters.
- Participation in special events, such as community fairs, pop-up events, neighborhood meetings, health care fairs, and cultural celebrations.
- Media releases and meetings with local media representatives.
- Web content including photos, timelines, project/study overview and funding as well as ways to contact OCTA for additional information
- Social media content on Facebook, Instagram and X
- Informal conversations with individuals and small groups.
- Interviews with people who are or could be affected by study recommendations.
- Presentations by experts on various transit-related subjects.
- User and non-user surveys.
- Use of various visualization techniques to convey the information, including, but not limited to, charts, graphs, photos, and maps.

All materials will be multilingual, and translation services will be provided as needed during meetings.

A combination of in person and virtual meetings/briefings will be used to ensure the greatest possible reach. Virtual meetings will feature a phone in option for those without broadband internet access.

Planning Studies:

A variety of outreach methods and tools are used to inform, educate, and seek input from the public when conducting transportation planning studies. OCTA staff actively engages with diverse populations and develops multilingual outreach materials to encourage meaningful and inclusive engagement. Following are several engagement techniques:

- Public workshops (in-person and virtual), pop-ups, and neighborhood meetings
- Multilingual digital media (social media, ads, geofencing, eblasts, blogs, web)
- Multilingual traditional media (newspaper ads)
- Multilingual online surveys
- Multilingual telephone helpline
- Multilingual collateral materials (fact sheets, postcards, infographics, FAQ)
- Stakeholder/Community Based Organization Roundtables and 1:1 briefings

Public Committees:

Community participation is essential when planning transportation solutions. OCTA seeks citizen input on our programs, studies and projects throughout the year through public meetings, open houses and workshops, online surveys, newspaper ads and focus groups. In addition to these and other public participation opportunities, citizen committees advise the Orange County Transportation Authority (OCTA) on a wide range of projects and programs, help identify opportunities for community input, and serve as a conduit for public participation. OCTA strongly encourages Orange County residents and community leaders to get involved and help improve the quality of life and mobility options for all Orange County residents.

- The Accessible Transit Advisory Committee (ATAC) advises OCTA about issues that relate to OCTA fixed-route transit and paratransit services for customers with special transportation needs. The Accessible Transit Advisory Committee was originally formed in 1992 in response to the Americans with Disabilities Act and formalized the predecessor “504 Committee.”
 - The committee meets quarterly and is composed of two appointees per each Director on the OCTA Board of Directors
 - The ATAC is specifically engaged on issues relating access and senior services.
 - Members often represent organizations that work closely with the disabled and senior communities.
 - Members are asked to share OCTA information with their constituents.
- The Citizens Advisory Committee (CAC) actively participates in helping examine traffic solutions, providing input to OCTA’s transportation studies and communicating with their constituencies. During the year, committee members are asked to participate in roundtable discussions and hear special presentations on various transportation projects, programs and services.
 - The committee meets quarterly and is composed of two appointees per each Director on the OCTA Board of Directors
 - As an advisory body, members’ comments and suggestions help to shape OCTA’s services and communications to be responsive and user-friendly to the public.
 - The wide range of viewpoints and interests represented by the CAC membership also provides OCTA with an added sounding board for prospective programs and initiatives.
 - Members are asked to share OCTA information with their constituents.

Major Service & Fare Changes and Fixed Route Bus Initiatives

Major Service & Fare Change Public Hearing Process:

The Federal Transit Administration requires that transit agencies have policies that provide the public an opportunity to comment on proposed major service changes and fare increases or decreases, and policy changes. OCTA has adopted a policy with the

following procedures, which provides for a public hearing in the event of a major service change or fare increase or decrease. The procedure for public review includes the following elements:

1. Public open house(s), workshop(s), focus group(s), community meeting(s), and/or virtual community meetings.
2. Publishing a notice describing the proposed major service change or fare increase or decrease in multiple language newspaper(s) of general circulation 30 days prior to the public hearing.
3. Place public notice brochures and/or advertisements on board buses describing the proposed changes.
4. Conduct a public hearing.

The public must be notified of each major service change or fare increase or decrease proposal and their comments must be gathered, considered and presented to the Board of Directors (Board) prior to Board approval of the proposed changes. Some or all of the following procedures, strategies, techniques, and media will be utilized to notify and engage the public in providing feedback prior to OCTA Board adoption of the proposed changes:

- Multilingual bus advertising and collateral: on-board brochures/flyers, with or without comment cards; bus interior and exterior advertisements.
- Multilingual informational signage, posters around major transit hubs.
- Multilingual digital Information: emails, social media, and dedicated web pages
- Multilingual telephone hotlines
- Multilingual advertisements: print, radio, and television advertisements
- Public open house(s), workshop(s), focus group(s), community meeting(s), and/or virtual community meetings held in multiple languages.
- Press releases and meetings with local media representatives.
- Multilingual information distribution through direct mailings and/or presentations to employers, schools, colleges and community-based organizations including those in disadvantaged and diverse communities.
- User and non-user survey instruments to gather feedback
- Multilingual information tool kits for Cities' use and distribution
- Use of various illustrative visualization techniques to convey the information, including, but not limited to, charts, graphs, photos, maps, and the Internet.

Stakeholder Working Group Recruitment

Some of or all of the following procedures, strategies, techniques, and media will be utilized to recruit membership for open positions for transit related decision-making and planning stakeholder working groups:

- Notifications to professional, public, and student organizations.
- Informal conversations with individuals and small groups.
- Interviews with people who are or could be affected by study recommendations.
- Presentations by experts on various transit-related subjects.

- User and non-user surveys.
- Use various illustrative visualization techniques to convey the information, including, but not limited to, charts, graphs, photos, maps, and the internet.
- Other techniques will be examined to determine the best methods of involving greater participation from all segments of the service area population during the planning process.

Availability of Planning Documents: Hard copies of documents, upon completion, will be available at the OCTA main office upon request located at 550 South Main St., Orange, CA 92863. Electronic versions of the documents will be available on the OCTA.net website.

Response to Information Requests and Comments: Comments will be documented by the People and Community Engagement Division, presented to decision-making bodies, modified in the content of the document, as necessary, and will be included in the appendices of planning products after they are approved and published. Comments received after studies and when other planning documents are completed and approved, will be documented and referenced when amending or updating planning projects in the future.

Public Involvement Plan Contact List: Information can be requested from the People and Community Engagement Division / Diversity Outreach staff in person and e-mail at titlevi-inquiries@octa.net, and U.S. mail at:

Orange County Transportation Authority
 Title VI Coordinator – 9th Floor
 550 S. Main Street
 P.O. Box 14184
 Orange, CA 92863-1584

The PIP will be subject to public engagement and will be updated as appropriate based on public input received during the solicitation period, the changing needs of the demographics, and communication preferences once every three years.

OCTA will continually update the stakeholder list to reflect additional diverse and low-income organizations that are the most significant stakeholders for Title VI compliance.

Public Involvement Plan Stakeholders

- Senior Centers
- Community Centers
- Community events
- Cities
- Cultural Centers
- Social Justice groups
- Social Service Agencies

- Community Based Organizations
- Religious and Faith Based Organizations
- Colleges and Universities
- School Districts
- High Schools
- Middle Schools
- Middle-Elementary Schools
- Elementary Schools
- Adult Education
- Hospitals
- Libraries
- Employer Transportation Coordinators/Employers
- Transportation Management Associations
- Chambers of Commerce
- Business Associations
- Professional Associations
- Home Owner Associations
- Ethnic media outlets
- OCTA Diverse Community Leaders' Group Network

OCTA
Public Committee Recruitment Efforts



Public Committee (CAC & ATAC) Recruitment Toolkit

Social Media Tool Kit

Introduction

OCTA has several standing public committees that are legislatively mandated and meet quarterly, providing advice and input on the Authority's various activities:

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Thank you for your help on sharing OCTA's position openings on the CAC and the ATAC.

Social Media Posts:

Twitter

Text: The Orange County Transportation Authority is on the lookout for qualified volunteers who are passionate about transportation to serve on the Citizens Advisory Committee and the Accessible Transit Advisory Committee. Applications are due May 6th! [Link: [Public Committees](#)]

Text (CAC): Are you passionate about shaping the future of transportation in your community? OCTA is searching for dedicated individuals to help examine traffic solutions and provide input to transportation studies and outreach activities by joining the Citizens Advisory Committee. Apply today! [Link: octa.net/cac]

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Blog/Newsletter/Website

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Potential committee members should demonstrate a history of participating in community activities and transportation issues and be willing to dedicate at least 15 hours per year to OCTA meetings and activities. Applications are available [here](#).

For additional information, please contact Allison Imler at (714) 560-5643 or aimler@octa.net.

Graphic attached to email:





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Public Committees

ACCESSIBLE TRANSIT ADVISORY COMMITTEE



Home / Public Committees / Accessible Transit Advisory Committee / Overview

Accessible Transit Advisory Committee

Accessible Transit Advisory Committee (ATAC) advises OCTA about issues that relate to OCTA fixed-route transit and paratransit services for customers with special transportation needs. The Accessible Transit Advisory Committee was originally formed in 1992 in response to the Americans with Disabilities Act and formalized the predecessor “504 Committee.”

PROJECT CONTACT

Christina Byrne

Department Manager, Public Outreach

(714) 560-5717 | cbyrne@octa.net

Major Responsibilities Include:

- Advising OCTA about issues that relate to OCTA transit and paratransit services.
- Recommending the appropriate mechanism for obtaining disabled and senior service users’ input on issues, i.e., focus groups, surveys, public meetings, et cetera.
- Communicating with care providers and agency clients regarding service-related information.
- Assisting with special needs service evaluations.

Selected by the OCTA Board of Directors, the ATAC is composed of 34 members representing a broad base of individuals with disabilities and senior citizens in the county. Selection criteria for the ATAC includes demonstrated interest and involvement with people with special needs and senior citizens; membership in a large, active OCTA constituency group (i.e. Braille Institute, senior centers); and a willingness to dedicate no fewer than 8 hours a year to OCTA meetings and activities. This recruitment process typically takes place late winter/early spring with final selection in June.

2024 Recruitment Period

Each year, as terms of various members expire, a recruitment process is conducted to fill vacant positions on the ATAC. Applications will be accepted for the 2024-2025 Accessible Transit Advisory Committee spring of 2024.

Public Committees

CITIZENS ADVISORY COMMITTEE



Home / Public Committees / Citizens Advisory Committee / Overview

Citizens Advisory Committee

The **Citizens Advisory Committee (CAC)** actively participates in helping examine traffic solutions, providing input to OCTA's transportation studies and communicating with their constituencies. During the year, committee members are asked to participate in roundtable discussions and hear special presentations on various transportation projects, programs and services.

PROJECT CONTACT

Christina Byrne

Department Manager, Public Outreach

(714) 560-5717 | cbyrne@octa.net

Major Responsibilities Include:

- Identifying opportunities for community input
- Recommending mechanisms and methodologies for obtaining public opinion on specific transportation issues
- Serving as a liaison between the public and OCTA
- Commenting on significant transportation issues and suggesting possible solutions

2024 Recruitment Period

Each year, as terms of various members expire, a recruitment process is conducted to fill vacant positions on the CAC. Applications will be accepted for the 2024-2025 Citizens Advisory Committee spring of 2024.

[APPLY ONLINE](#)

If you need additional information, please contact Christina Byrne at [\(714\) 560-5717](tel:7145605717) or cbyrne@octa.net.

OCTA
Making Better Connections Public Involvement Plan
and Board Approval



Call to Order

The Monday, October 24, 2022, regular meeting of the Orange County Transportation Authority (OCTA) and affiliated agencies was called to order by Chairman Murphy at 9:01 a.m. at the OCTA Headquarters, 550 South Main Street, Orange, California.

Directors Present: Mark A. Murphy, Chairman
Gene Hernandez, Vice Chairman
Lisa A. Bartlett
Doug Chaffee
Barbara Delgleize
Andrew Do
Katrina Foley
Brian Goodell
Patrick Harper
Michael Hennessey
Steve Jones
Fred Jung
Joseph Muller
Tam Nguyen
Vicente Sarmiento
Donald P. Wagner
Ryan Chamberlain

Directors Absent: None

Staff Present: Darrell E. Johnson, Chief Executive Officer
Jennifer L. Bergener, Deputy Chief Executive Officer
Andrea West, Interim Clerk of the Board
Allison Cheshire, Clerk of the Board Specialist, Senior
Sahara MEisenheimer, Clerk of the Board Specialist
James Donich, General Counsel

Special Calendar

1. Update on Emergency Railroad Track Stabilization in the Vicinity of Milepost 206.8 on the Orange Subdivision

James Donich, General Counsel, provided an overview of the statute pertaining to this item.

Jim Beil, Executive Director, Capital Planning, provided a report on this item.



A discussion ensued among the Members and staff regarding the following:

- Concerns over the hill slide
- Transportation options for commuters in the track closure area
- Service restored to San Juan Capistrano
- Working in partnership with Amtrak and Metrolink on transportation solutions

A motion was made by Director Muller, seconded by Director Delgleize, and declared passed by those present, to reaffirm Resolution No. 2022-075 authorizing the Chief Executive Officer to take all necessary actions to address the emergency need for railroad track stabilization in the vicinity of Mile Post 206.8 on the Orange Subdivision, and to return to the Board of Directors, as required, to report on the status thereof.

2. Presentation of Resolutions of Appreciation for Employees of the Month for October 2022

Resolutions of appreciation were presented to Horacio Castillo, Coach Operator; John San Esteban, Maintenance; and Ross Lew, Administration, as Employees of the Month for October 2022.

Consent Calendar (Items 3 through 18)

3. Approval of Minutes - October 10, 2022

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to approve the minutes of the October 10, 2022 Orange County Transportation Authority and affiliated agencies' regular meeting.

4. Approval of Minutes - October 3, 2022 - Special Meeting

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to Approve the minutes of the October 3, 2022 Orange County Transportation Authority and affiliated agencies' special meeting.

5. Investments: Compliance, Controls, and Reporting, January 1 through June 30, 2022, Internal Audit Report No. 23-502

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to direct staff to implement two recommendations provided in Investments: Compliance, Controls, and Reporting, January 1 through June 30, 2022, Internal Audit Report No. 23-502.



6. Amendment to Agreement for the Interstate 405 Customer Service and Operations Center Lease

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to authorize the Chief Executive Officer to negotiate and execute Amendment No. 1 to Agreement No. C-1-3955 between the Orange County Transportation Authority and C.J. Segerstrom & Sons, in the amount of \$550,000, for the 405 Express Lanes Customer Service and Operations Center tenant improvements. Amending this agreement will increase the maximum payment obligation of the agreement to a total contract value of \$15,973,000.

7. Award of Sole Source Agreement for the Purchase and Maintenance of Xerox Iridesse 120 Color Production Press

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to authorize the Chief Executive Officer to negotiate and execute sole source Purchase Order No. C22717 between the Orange County Transportation Authority and Xerox Corporation, in the amount of \$327,000, for the purchase of a Xerox Iridesse Color Production Press. The purchase amount also includes maintenance and training for the press.

8. Draft 2023-24 State and Federal Legislative Platforms

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to direct staff to move forward with the recommended revisions to the draft 2023-24 Orange County Transportation Authority State and Federal Legislative Platforms and incorporate any feedback from the Orange County Transportation Authority Board of Directors, returning to the Board of Directors for final adoption at a later date.

9. State and Federal Legislative Status Report

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to receive and file as an information item.

10. Metrolink Fiscal Year 2021-22 Performance Report

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to receive and file as an information item.

11. Cyber-Privacy Security Insurance Policy

This item was pulled by Director Hennessey to note discussion on this item at the Finance and Administration Committee meeting and suggest an amendment to the recommendation to cap the not to exceed amount at \$300,000.



A motion was made by Director Hennessey, seconded by Vice Chairman Hernandez, and declared passed by those present, to Authorize the Chief Executive Officer to negotiate and execute Purchase Order No. A52000, in the amount not to exceed \$300,000, to Marsh Risk and Insurance Services, Inc., to purchase cyber-privacy security insurance on behalf of the Orange County Transportation Authority for the policy period of November 1, 2022, to November 1, 2023.

12. Amendment to Agreement for Rideshare and Vanpool Marketing, Design, and Advertising Services

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to Authorize the Chief Executive Officer to negotiate and execute Amendment No. 4 to Agreement No. C-0-2206 between the Orange County Transportation Authority and Brown Marketing Strategies, Inc., to exercise the option term, in the amount of \$105,000, to continue providing rideshare and vanpool marketing, design, and advertising services effective November 1, 2022 through October 31, 2023. Amending this agreement will increase the maximum payment obligation of the agreement to a total contract value of \$675,000.

13. Agreement for Diversity Outreach Consultant Services

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to:

- A. Approve the selection of Modern Times, Inc., as the firm to provide diversity outreach consultant services.
- B. Authorize the Chief Executive Officer to negotiate and execute Agreement No. C-2-2655 between the Orange County Transportation Authority and Modern Times, Inc., in the amount of \$349,862, for a two-year initial term with one-year option term to provide diversity outreach consultant services.

14. Acceptance of Grant Award from Federal Transit Administration Low or No Emission Grant Program and Department of Homeland Security Transit Security Grant Program

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to:

- A. Authorize the Chief Executive Officer, or designee, to accept the award of \$2,507,895 in Federal Transit Administration Low or No Emission Grant program funding for the Orange County Zero-Emission Paratransit Bus Pilot, and to negotiate and execute grant-related agreements and documents with the Federal Transit Administration.



- B. Authorize the Chief Executive Officer, or designee, to accept the award of \$36,635 in Federal Emergency Management Agency funding awarded by the Department of Homeland Security through the Transit Security Grant Program and execute grant-related agreements and documents with the Department of Homeland Security.
- C. Authorize staff to make all necessary amendments to the Federal Transportation Improvement Program, as well as execute any necessary agreements to facilitate the recommendation above.

15. SB 1 (Chapter 5, Statutes of 2017) State of Good Repair Claims for Fiscal Year 2022-23

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to Authorize the filing of SB 1 State of Good Repair claims, in the amount of \$6,633,221, or up to the actual allocation published by the State Controller's Office, to help sustain and upgrade the Orange County Transportation Authority's bus system.

16. State Transit Assistance Fund Claims for Fiscal Year 2022-23

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to Adopt Resolution No. 2022-071 to authorize the filing of State Transit Assistance Fund claims, in the amount of \$52,555,173, or up to the actual allocation published by the State Controller's Office, to support public transportation.

17. Amendment to Agreement for Hydrogen Station Operation, Maintenance, and Fuel Delivery

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to Authorize the Chief Executive Officer to negotiate and execute Amendment No. 6 to Agreement No. C-7-1577 between the Orange County Transportation Authority and Trillium USA Company LLC, in the amount of \$351,720, to exercise the first option term of the agreement from January 1, 2023 through December 31, 2023, for continued hydrogen station operation, maintenance, and hydrogen fuel delivery. This will increase the maximum obligation of the agreement to a total contract value of \$7,967,912.



18. Approval to Release Request for Proposals for Program Management Consultant Services for Capital Programs

A motion was made by Vice Chairman Hernandez, seconded by Director Jones, and declared passed by those present, to:

- A. Approve the proposed evaluation criteria and weightings for Request for Proposals 2-2855 for program management consultant services for Capital Programs.
- B. Approve the release of Request for Proposals 2-2855 for program management consultant services for Capital Programs.

Regular Calendar

19. OC Streetcar Project Quarterly Update

Ross Lew, Project Manager, and Tresa Oliveri, Community Relations Principal, provided a presentation on this item.

A discussion ensued among the Members and staff regarding the following:

- Estimated completion date of project
- Project mitigation efforts
- Possibility of future extension of project
- Cost comparison to other types of transit projects

Following the discussion, no action was taken on this receive and file as an information item.

20. Contract Change Orders for Construction of the OC Streetcar Project

Ross Lew, Project Manager, provided a report on this item.

A motion was made by Director Jones, seconded by Director Sarmiento, and declared passed by those present, to:

- A. Authorize the Chief Executive Officer to negotiate and execute Contract Change Order No. 150.1 to Agreement No. C-7-1904 with Walsh Construction Company II, LLC, in the amount of \$800,000, for Fourth Street extended work hours and public safety.
- B. Authorize the Chief Executive Officer to negotiate and execute Contract Change Order No. 183 to Agreement No. C-7-1904 with Walsh Construction Company II, LLC, in the amount of \$480,000, for track switch indication lights.



- C. Authorize the Chief Executive Officer to negotiate and execute Contract Change Order No. 185 to Agreement No. C-7-1904 with Walsh Construction Company II, LLC, in the amount of \$550,000, for additional Builder's Risk insurance.

Director Wagner voted in opposition to this item.

21. Making Better Connections Study Final Service Plan

Kurt Brotcke, Director of Planning, and Dan Phu, Manager of Sustainability Planning, provided a presentation on this item.

A discussion ensued among the Members and staff regarding the following:

- Discontinuation of service into the peninsula
- Suspension of express routes
- Potential impacts to ACCESS trips
- Options to augment service in South County

Public comment was received via email from Jane Reifer on October 21, 2022 at 4:35 p.m. and was provided to the Board of Directors on October 23, 2022 at 6:58 p.m. via email.

Public comments were received in person from Paul Hyek and Peter Warner.

A motion was made by Director Hennessey, seconded by Vice Chairman Hernandez, and declared passed by those present, to:

- A. Receive and file the final Public Involvement Plan.
- B. Approve the final service plan that reflects the public input process.
- C. Direct the Executive Director of Planning, or his designee, to file a Notice of Exemption pursuant to the California Environmental Quality Act related to the bus service changes.
- D. Direct staff to begin implementation in 2023 and develop an implementation plan consistent with available labor resources.



Discussion Items

22. Public Comments

Public comment was received via email from Craig A. Durfey on October 23, 2022, at 12:50 p.m. and provided to the Board of Directors via email on October 23, 2022, at 6:58 p.m.

23. Chief Executive Officer's Report

Darrell E. Johnson, Chief Executive Officer, reported on the following:

- California State University, Fullerton/Orange County Business Council Annual Economic Forecast Conference on October 27, 2022
- Update on labor negotiations.

24. Directors' Reports

There were no Directors' reports.

25. Closed Session

A Closed Session was not scheduled for this meeting.

26. Adjournment

The meeting adjourned at 10:26 a.m.

The next regularly scheduled meeting of this Board will be held at **9:00 a.m. on Monday, November 14, 2022** at the OCTA Headquarters, 550 South Main Street, Orange, California.

ATTEST:

A handwritten signature in blue ink, appearing to read "Gina Ramirez", is written over a horizontal line.

Gina Ramirez
Principal Clerk of the Board Specialist



October 13, 2022

To: Transit Committee
From: Darrell E. Johnson, Chief Executive Officer
Subject: Making Better Connections Study Final Service Plan

A handwritten signature in blue ink, appearing to read "Darrell E. Johnson", is located to the right of the "From:" field.

Overview

The Orange County Transportation Authority is undertaking a comprehensive study to assess emerging travel trends and the transit network design in Orange County. The Making Better Connections Study has evaluated and developed improvements to OC Bus service and route structures to better align with current ridership. Extensive public engagement to inform the development and evaluation of the final recommendations occurred between May and July 2022, culminating in a public hearing at the July 25, 2022, Board of Directors meeting. The final service plan strives to improve bus service on high ridership routes, reduce the wait time, and simplify route structures. This report provides a recap of the public input process that resulted in the development of the final service plan, and seeks Board of Directors approval of the final service plan.

Recommendations

- A. Receive and file the final Public Involvement Plan.
- B. Approve the final service plan that reflects the public input process.
- C. Direct the Executive Director of Planning, or his designee, to file a Notice of Exemption pursuant to the California Environmental Quality Act related to the bus service changes.
- D. Direct staff to begin implementation in 2023 and develop an implementation plan consistent with available labor resources.

Background

The Orange County Transportation Authority (OCTA) provides transit service to Orange County, with more than 50 OC Bus routes and one OC Flex zone.

Staff continually monitors OC Bus service performance and makes schedule adjustments several times a year. In addition, OCTA periodically conducts a systemwide analysis of ridership and performance trends. The last systemwide study was completed in 2012 and implemented as OC Bus 360°. The Making Better Connections Study (Study) analysis was conducted to recommend transit service modifications to improve performance, grow ridership, and/or align bus service with changes in transit ridership patterns.

Transit ridership has been declining over the past decade, mirroring regional and national trends. The changes in ridership levels were influenced by the coronavirus (COVID-19) stay-at-home orders and dramatic changes in travel patterns. The Study proposes to align OC Bus service plans with emerging transit demand and travel patterns. Transit performance, ridership, countywide multimodal travel trends, and customer input were evaluated to form the basis for the initial service recommendations. The draft service plan was presented to the Board of Directors (Board) in May 2022 to initiate the public outreach process. The final Study recommendations better align transit services with changing travel patterns and target when and where people travel. The executive summary is included as Attachment A.

Discussion

Study Approach

The goals of the Study consist of improving customer experience and growing ridership by adhering to the following guiding principles:

- Matching the service to specific markets,
- Preserving and improving service in the central core area (e.g., central and northern parts of Orange County), and
- Leveraging innovation and technology to reduce customer wait and travel times.

Public Involvement Plan

Under the Federal Transit Administration (FTA) Title VI Policy, major service changes need to be supported by a Public Involvement Program, including a public hearing, prior to Board approval. The Making Better Connections Service Plan included a comprehensive outreach program that adheres to Title VI Public Involvement Plan guidelines. The main goal was to create awareness of the proposed changes and encourage participation with an additional focus on hard-to-reach communities through multilingual and multifaceted approaches. Further information regarding the outreach methods and activities can be found in the final Public Involvement Plan under Attachment B.

On January 24, 2022, the Board directed staff to launch Phase One of the Public Involvement Plan to gauge customer reaction and solicit feedback on the public's transit preferences to draft the recommendations of the Study. In addition, OCTA adhered to Title VI Policy by using multifaceted approaches and extensive public outreach to diverse and hard-to-reach communities, resulting in 1,476 surveys and comments received.

On May 23, 2022, the Board directed staff to release the draft service plan and implement Phase Two of the Public Involvement Plan. This public input process occurred between May and July 2022, with three public meetings in June 2022, and culminating in a public hearing at the July 25, 2022, Board meeting.

Between May 23 and July 25, 2022, the public outreach process resulted in more than 8,500 comments and in-person engagements on the draft service plan, which demonstrated the in-depth public involvement program and the level of interest from both users of OC Bus service and the general public. This includes 186 comments that were received after the close of the process on July 25, 2022. Public feedback was gathered from in-person and virtual community meetings and events, online/print surveys, by phone, and digital communications.

Survey respondents were asked for their feedback on individual routes for the proposed bus service plan. A variety of tactics were utilized to gain comprehensive and meaningful public input which yielded the following results:

- 57 percent of responses supported the proposed draft service plan.
- 23 percent of responses disagreed with the proposed OC Bus service plan on individual routes.
- 20 percent of responses were neutral with the proposed OC Bus service plan on individual routes.

Draft Service Plan Summary

The project team developed the draft service plan using the established framework, evaluation criteria, as well as feedback from the outreach efforts. The draft service plan will improve travel time for passengers by increasing bus service frequencies in the core area of the County where ridership demand is highest and will implement timed-transfer hubs in the suburban areas of the County. While the draft service plan maximizes the use of available resources, it also aligns the transit service to transit market conditions by concentrating and improving service in the core areas of the County. Staff further refined the initial set of recommendations by applying historical ridership trends, on-the-ground operational experience, and known customer needs.

The draft service plan included a set of recommendations that maximized service efficiency while minimizing impacts on the transit riders, as summarized below:

- Increase overall service hours by 192,000 annually or 13 percent higher than current service levels,
- Increase bus trips by 16 percent on weekdays, by eight percent and 13 percent on Saturdays and Sundays, respectively, compared to existing service levels,
- From 6:00 AM to 6:00 PM, operate the top ten corridors with ten to 15 minutes frequencies, 35 routes in the core area with 30 minutes or better frequencies, and 11 routes between 30 to 60 minutes frequencies,
- Provide timed transfers at the Laguna Hills Transportation Center and Brea Mall,
- Implement a new Route 164 in the City of Irvine along Irvine Boulevard,
- Implement a new Bravo! Route 553 on Main Street (to be implemented in October 2022),
- Discontinue five express routes (currently suspended), one Stationlink route and three local routes, and reallocate the resources to improve system productivity, and
- Expand service hours, modify route alignments, or discontinue unproductive routes or route segments.

These recommendations were further refined following the outreach process and incorporated into the final service plan.

Final Service Plan Summary

The comments received in response to the May 2022 release of the draft service plan pertained to a variety of items including but not limited to, new routes, route improvements (e.g., frequency, weekday hours, and/or weekend hours), more weekday hours and/or weekend hours, improved frequency with more weekday hours and/or weekend hours, changes to frequency, and other adjustments (e.g., weekday/weekend hours and/or alignment changes, discontinued routes, etc.

Staff and the consultant team reviewed the comments and made adjustments based on a number of factors. These included consideration of whether there were parallel routes (within a half-mile of other routes) that could provide complementary service, the target of 1.625 million annual revenue vehicle hours consistent with OCTA's Fiscal Year 2022-23 Budget, and network implications of individual route changes. Currently, OCTA operates approximately 1.44 million annual revenue vehicle hours; therefore, the final service plan would add approximately 185,000 annual revenue vehicle hours.

Overall, 17 routes were modified from the May 2022 draft service plan. Eleven of those modifications can be characterized as major shifts and the balance of six are considered minor shifts. The modifications between the draft and final service plans include restoring service to the existing alignment and/or service levels, restoring segments and/or routes that were slated to be discontinued, and making additional frequency and route alignment improvements based on customer feedback. Additional detail on each of the route changes including a description of the proposed route recommendations along with the frequency and span of service recommended for each bus route, from the draft to final service plan are included in Attachment C.

Implementation Considerations

Limited availability of coach operators, which has been prevalent across the transit industry, is having an impact on how much bus service OCTA can reliably operate. Despite increased recruitment and retention efforts, OCTA and its contractor will not have sufficient coach operators to implement service levels of 1.625 million annual revenue vehicle hours by February 2023. Therefore, the service plan recommendations will go into effect over time to ensure that OCTA continues to provide reliable bus service and to mitigate effects of the labor resource challenges. It is anticipated the service level increases would need to occur over a period of up to 24 months. This would be accomplished through the service changes that occur in February, May, August, and November of each year.

To ensure continuity of reliable bus service and successful rollout, coupled with the labor resource challenges, the final service plan will be implemented based on the following guiding principles/framework:

- Assess and determine the availability of labor resources during each service change,
- Monitor ridership levels (with a specific focus on Kindergarten-12 schools, colleges, and universities) and focus on service additions to ensure sufficient capacity on vehicles to accommodate passenger loads,
- Adjust service based on changes in demand (establishing a transit network based on changes to travel pattern/demand in a post-COVID-19 environment),
- Balance service changes to accommodate seasonal differences in transit demand (summer service, school service, etc.),
- Group changes to minimize potential gaps in geographic coverage (e.g., if one route is being realigned to cover a discontinued segment, these changes should happen concurrently),
- Group changes at timed transfer hubs ensuring the service levels allow for timed connections to minimize passenger wait time, and

- Implement the changes systematically, which may take up to 24 months, to allow flexibility and to minimize the burden on the availability of labor resources.

OCTA provides OC ACCESS , which is complementary paratransit service as required by the American with Disabilities Act (ADA). The ADA refers to “complementary service” as service offered within three-fourths of a mile of a fixed-route and consistent hours of operation. Great effort was taken to ensure the final service plan would have minimal impacts on OC ACCESS. It is estimated that the final recommendations would affect about 15 daily OC ACCESS trips out of 2,840, meaning that these trips would fall outside of the three-fourths mile buffer. For these riders, OCTA’s Same-Day Taxi service would be available. Direct notice would be provided ahead of time with specifics on the service changes and information regarding alternative service options.

Attachment D and Attachment E depict the existing bus transit network, as well as the proposed network maps for the northern and southern areas of Orange County, respectively. Attachment F contains the proposed routes by type (e.g., local [generally serve major arterials], Community [generally operate in localized areas], Stationlink [provides bus service to Metrolink stations], and Bravo! [operates as a limited-stop service]). Attachment G contains a map of the discontinued routes.

Title VI and Environmental Justice Analysis

Staff conducted a Title VI and Environmental Justice analysis of the recommended Making Better Connections Final Service Plan, per OCTA policy and FTA requirements. The analysis accumulated impacts on minority and low-income communities by comparing the transit service levels before and after the changes in the service plan. Based on this analysis, it has been determined the plan recommendations, taken in their entirety, would not have a disparate impact on minority persons nor a disproportionate burden on low-income persons.

Next Steps

With Board approval, the final service plan will be implemented over several service changes beginning in 2023 and could take up to 24 months to implement the entire plan. The ability for OCTA to effectively implement the changes will be contingent upon the availability of labor resources. Staff will return to the Board to seek approval on the specifics of each service change and customers will be notified of the changes in advance. Staff anticipates communicating the changes on routes that are affected by the service change through OCTA’s social media channels, email blasts to customers, On the Move blog, OCTA’s website, and print material provided on buses. In addition, OCTA will present the final changes at OCTA advisory committee meetings. As noted earlier, the proposed new

Bravo! Route 553 was approved as part of the October 2022 service change at the September 12, 2022 Board meeting, and will be in service shortly thereafter. Staff will file a Notice of Exemption pursuant to the California Environmental Quality Act to solidify the action taken by the Board.

Summary


OCTA is conducting the Study to assess transit performance and emerging travel trends in Orange County and realign the service to changes in transit market. The study makes recommendations to increase overall service levels and improve transit service throughout Orange County. Staff has developed a final service plan based on OC Bus performance and travel trends analysis, along with input on transit preferences from the public. The projected service levels in the final service plan are commensurate with 1.625 million annual revenue hours of bus service that OCTA operated prior to the onset of COVID-19 and is consistent with the fiscal year 2022-23 budget. Since the final service plan will be implemented in phases, an extensive marketing campaign is anticipated for each service change, and staff will provide the Board an update prior to implementation of each service change.

Attachments

- A. Making Better Connections Study Executive Summary, October 2022
- B. Making Better Connections Study Service Plan, Final Public Involvement Program, October 13, 2022
- C. Final Service Plan: Proposed Route Recommendations
- D. Existing and Proposed Route Network (North County)
- E. Existing and Proposed Route Network (South County)
- F. Local (1-99), Community (100-199), Stationlink (400s), and Bravo! (500s) Routes
- G. Discontinued Routes

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Making Better Connections Study

Executive Summary

October 2022



Introduction

In Summer 2021, the Orange County Transportation Authority (OCTA) undertake a comprehensive look of the OC Bus system to better align the transit system design with emerging, post pandemic, travel patterns. Known as The Making Better Connections Study, this effort would concentrate resources where transit demand is highest, thereby, maximizing the opportunity for where there is unmet transit demand. As transportation needs and preferences evolve, OCTA has an opportunity to create the bus network of the future rather than restoring the network of the past. The project's key goals are:

1. Ensure that the type and level of service matches and meets the needs of the area it is serving.
2. Maintain and improve service on the routes with highest levels of ridership.
3. Leverage innovation and technology to reduce wait and travel times.

In addition, the Making Better Connections project is an opportunity to address two key challenges:

1. The COVID-19 pandemic has reduced transit ridership and service and changed travel patterns throughout Orange County. The project is an opportunity to restore service in a way that reflects current travel patterns.
2. Even before the pandemic, public transit ridership was declining across the country as access to private vehicles increased. Transit must continually evolve to meet changing mobility needs and to provide high-quality, reliable, and time-competitive service. The Making Better Connections project is an opportunity to realign transit design with rider expectations.

Project Process

The Making Better Connections project began in June 2021. Throughout the summer and fall of 2021, the project team conducted a comprehensive analysis of existing conditions, looking at service performance, ridership patterns, and regional travel behavior. In early 2022, the team conducted a survey of riders and non-riders to understand priorities for an improved transit network. The feedback from the survey as well as key findings from the existing conditions analysis were used to develop the draft service plan in spring 2022. From May through July 2022, the project team collected over 4,000 comments on the proposed service changes, and this culminated in a public hearing at the July 25, 2022 OCTA Board of Directs meeting. The analyses, in conjunction with public input, have been incorporated into a final plan that will be presented to the OCTA Board of Directors in October 2022 for consideration.

Data Sources

The primary data source used for the existing conditions analysis was automatic passenger counter (APC) data from late September and early October in 2019 and 2021. Travel pattern data came from location-based services (LBS) data collected from cell phone GPS data obtained from applications running on smartphones. Community and rider survey responses and coach operator feedback were also incorporated into the guiding principles and final proposed plan.

Key Takeaways from Existing Conditions Analysis

The initial phase of the project was an analysis of the existing conditions, to better understanding what works and what doesn't work in the current system.

Regional Travel Patterns

The project team used location-based services (LBS) data to better understand how people's travel patterns have changed in response to the COVID-19 pandemic. The key findings from that analysis are:

1. **Time of Day:** There is a clear mismatch between when OCTA offers high levels of service and when general public trips are taking place. This is likely attributed the change in travel pattern. OCTA has historically provided higher service levels during traditional AM Peak and PM Peak commute periods and generates higher levels of ridership during those times in response to providing better service, but provides less service in the evening, even as general public trip demand remains high. Adjusting service levels to be more consistent throughout the day can help expand transit's ability to be attractive for a wider variety of trip purposes at different times of day.
2. **Trip Purpose:** Although most transit is designed to take people from home to regular destinations such as work or school, the majority of general public trips are between home and another destination.
3. **Trip Length:** Most trips are relatively short distance – 64% are under five miles. The fact that most trips are relatively short-distance and not in fact long-distance cross-county trips is critical to the design of the transit network.
4. **Geography:** As a result of the COVID-19 pandemic, overall trip making increased the most in coastal areas and at outdoor recreational facilities, and declined the most around schools, major universities, and the Disneyland amusement park.

Network Design and Service Performance

The project team analyzed OC Bus ridership data from September and October 2021 to assess strengths and weaknesses in current service delivery. The key findings from that analysis are:

- One-half of all system boardings take place on just nine routes (Routes 29, 42, 43, 47, 53, 57, 60, 64, and 66). This means that focused investment in a limited number of routes will have a significant impact on overall system ridership.
- Approximately 40% of riders transfer as part of their trip, and 80% of all transfers involve just seven routes (29, 43, 47, 57, 60, 64, and 66). Increasing service levels on these routes can help reduce transfer wait times and improve their experience.
- Service performance is strongest in dense, urban areas with high concentrations of destinations and is less successful in suburban communities with auto-centric street patterns and lower development densities.

Public Outreach – First Round

The first round of public outreach for the Making Better Connections project happened at the beginning of the project to collect feedback on the public's preferences in transit service delivery. The project team collected 1,476 surveys and comments from riders and non-riders through virtual open houses, pop-up events at major cultural events, and advertisements in print media and on buses.

The initial round of outreach had several key findings that were used to develop the guiding principles and draft plan:

1. Frequency of service was by far the most important improvement, outweighing the second most important improvement of reliability by a factor of 2:1.
2. 56% of respondents prefer buses serve a smaller area with more frequent service while 35% prefer buses serve a larger area with less frequent service. South County residents were much more likely to want service to cover a larger area with lower levels of service.
3. 51% of respondents prefer 20-minute service all-day while 49% of respondents prefer 15-minute peak service and 30-minute midday service.
4. On average, the longest amount of time respondents are willing to wait for a transfer is 20 minutes.
5. 67% of respondents prefer traditional fixed-route service with fixed stops and schedules while 33% prefer on-demand service requested through an app or call center that operates like Uber or Lyft (OC Flex).

Guiding Principles

Building on the analysis of existing conditions and using community feedback from the first round of public outreach, OCTA developed a set of guiding principles that was used in the development of the service plan:

1. **Frequency is Key:** Create a network of 15-minute service on the system's highest ridership routes; try for a minimum of 30-minute service on all routes (as resource constraints allow); do not have any route operate less than every 60 minutes.
2. **Attract, Don't Chase, Riders:** Provide direct connections between major rider destinations, limiting out-of-direction deviations with low ridership.
3. **Walk-Wait-Ride Ratios Matter:** Increase frequency on routes in high density areas where destinations are closer together and average trip lengths are shorter.
4. **Create an All-Day, All-Week Network:** Increase frequency during the midday, evenings, and weekends and extend service later into the evenings to improve transit's attractiveness for all types of trip purposes.
5. **Make Better Connections:** Extend routes to end at major ridership destinations (shopping malls, Metrolink stations, transfer hubs); coordinate timed connections between routes at key transfer hubs to minimize transfer wait times.

Service Plan Summary

The draft plan made significant changes to the OCTA network, with almost every route seeing at least some changes. Overall, the draft plan focused on increased frequencies in the core network, especially on the busiest corridors. The draft plan also made significant changes to routes on the periphery of the network, especially in La Habra and South County. Unproductive routes and segments were proposed to be eliminated, and routes were restructured to provide timed transfers at key locations. The draft plan also introduced two new routes, Routes 553 and 164.

Second Round of Public Outreach

In May of 2022, OCTA presented the draft Making Better Connections plan to the public. The project team launched a website that detailed the changes of the draft Making Better Connections plan, hosted three community meetings, and distributed information about the draft plan through a variety of

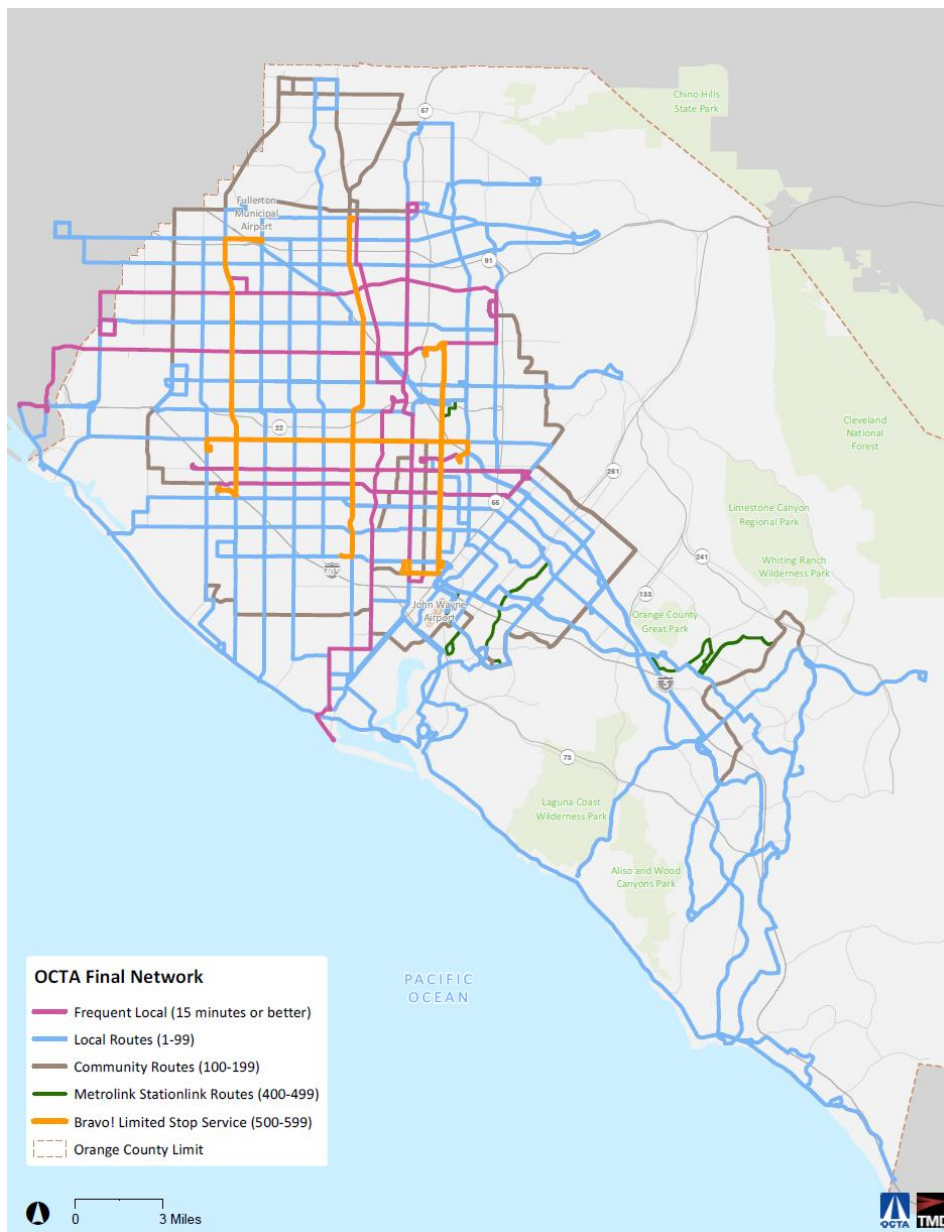
channels. In total, the project team collected more than 4,000 responses to the draft plan, in a variety of categories.

Draft Plan vs Final Service Plan

Based on the comments received, the project team made the following changes for the Final Service Plan:

- Route 26 – restored to its original alignment and service levels.
- Route 29 – restored service to Goldenwest Transit Center when 529 is not running.
- Route 37 – restored service to La Habra.
- Route 42 – extend route south to Ball Rd to maintain transfer opportunities with service to Seal Beach on Route 46.
- Route 53 – restore to its original alignment with a direct connection to Irvine.
- Route 66 – restore to its original alignment with a direct connection to Irvine.
- Route 76 – continue to operate route on existing alignment and service levels to maintain service to John Wayne Airport.
- Route 83 – realign service on Ball Rd to serve additional stop by Disneyland before resuming service on I-5.
- Route 86 – restore to its original alignment and service levels.
- Route 123 – extend service to terminate at CSU-Fullerton, maintaining a direct connection between Fullerton College and CSU-Fullerton along E Chapman Ave.
- Route 129 – improve frequency from every 60 to every 30 minutes in order to provide more comparable service levels on segment previous served by Route 29.
- Route 143 – restore to its original alignment.
- Route 164 – no longer recommended as a new route due to low levels of support, and the fact that the revised Route 167 would heavily duplicate it.
- Route 167 – restore to its original alignment and service levels.
- Route 177 – extend to Portola Plaza to cover segment of discontinued Route 82.
- Route 178 – restore to its original alignment.
- Route 553 – extend southern terminus to South Coast Plaza for better network connections.

Final Plan



The final plan has a number of improvements over the existing service:

- The top 10 corridors will operate every 10-15 minutes from 6:00AM to 6:00PM, benefiting over 58% of all riders.
- All routes operate on a maximum of 60 minutes, every day of the week.
- New timed transfer hubs at the Brea Mall and Laguna Hills Transportation Center.
- A new limited stop Bravo! Route 553 on Main Street (implemented as part of Oct '22 Service Change).
- An increase in the total number of bus trips offered, adding over 114,000 annual trips. The final plan adds 390 trips on weekdays, and 275 trips on weekends.

- Approximately 89% of OC Bus riders will experience more frequent service, better connections, or more hours of service.
- Approximately 10% will experience no changes.
- Less than 1% of riders will be more than ½ mile from a bus stop.

Labor Resource Challenges

Since the COVID-19 pandemic, transit agencies across the country have faced on-going coach operator shortages, and OCTA is no exception. The Making Better Connections plan increases service levels back to pre-pandemic levels of 1.625 million annual revenue hours. Despite increased recruitment efforts, OCTA does not currently have sufficient coach operators to implement this level of service by February 2023. As a result, the Making Better Connections project will be phased over a two-year period, with service changes scaled appropriately to match the available number of coach operators.

Implementation Approach

The Making Better Connections plan will be phased in over several service changes, beginning with the February 2023 service change. OCTA will monitor on-going service delivery to measure ridership response to the changes, assess new running times, and evaluate timed transfers.

In order to implement the changes in light of challenges with labor resources while at the same time striving to improve operational efficiencies for customers, the final service plan will be implemented incrementally based on the following guiding principles/framework:

- Assess and determine the availability of labor resources during each service change,
- Monitor ridership levels (with a specific focus on K-12 schools, colleges, and universities) and focus service additions to ensure sufficient capacity on vehicles to accommodate passenger loads,
- Adjust service based on changes in demand (establishing a transit network based on changes to travel pattern/demand in a post-COVID-19 environment),
- Balance service changes to accommodate seasonal differences in transit demand (summer service, school service, etc.),
- Group changes to minimize potential gaps in geographic coverage (e.g., if one route is being realigned to cover a discontinued segment, these changes should happen concurrently),
- Group changes at timed transfer hubs ensuring the service levels allow for timed connections to minimize passenger wait time,
- Operate a level of bus service commensurate with the evolving needs of the riders, and
- Implement the changes systematically, which may take up to 24 months, to allow flexibility and to minimize the burden on the availability of labor resources.

Prior to each service change, customers will be notified of the changes in advance. It is anticipated the communication on the changes for the routes that are affected by the service change would be through OCTA's organic social media channels, email blasts to customers, On the Move blog, information on landing page on OCTA's website, and provided on buses. In addition, OCTA will present the final changes at OCTA advisory committee meetings.

Making Better **Connections**



Making Better Connections Study Service Plan

FINAL PUBLIC INVOLVEMENT PROGRAM

October 13, 2022



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Introduction

The Making Better Connections Study is an analysis of the OC Bus network with recommendations for service improvements to improve the customer experience. As transit ridership and service levels return, the study looks to improve the bus network to reflect current travel patterns resulting from changes brought on by the coronavirus (COVID-19) pandemic. With more travel options than ever, public transit must work harder to attract riders by delivering high-quality, reliable service, and evolving to meet changing mobility needs.

In January 2022, the Board of Directors (Board) directed staff to implement Phase One of the public involvement program, which included gathering and analyzing public feedback that led to the development of the Making Better Connections Study Draft Service Plan (Plan).

The Plan is the result of months of analysis of travel patterns and ridership trends, engagement with community stakeholders, and thoughtful redesign of routes to provide better outcomes for riders by matching service to specific markets/destinations, preserving and improving service in high-demand areas, and leveraging innovation and technology to reduce customer wait and travel times.

As directed by the Board on May 23, 2022, staff-initiated Phase Two of the public involvement program to gather input on the Plan. This final public involvement program report summarizes the outreach efforts and public feedback received during the public outreach period from May 23, 2022, to July 25, 2022.

The Making Better Connections Study Final Service Plan (Final Plan), incorporating any changes from Board and public feedback, is being presented to the Board in October 2022. Once finalized and approved by the Board, the Final Plan will begin to be implemented as early as February 2023.

Executive Summary

OCTA is committed to ensuring key stakeholders and the public, including bus customers and hard-to-reach audiences, remain engaged and informed about the Plan.

OCTA developed a comprehensive outreach strategy to gain feedback on the Plan. The goal of the outreach effort was to provide the public with information, ensure customer and public input is heard, and provide public feedback to inform the Plan to be presented to the Board for consideration.

An inclusive public involvement program used various tactics to inform and gather feedback, including a multilingual online and print survey, in-person/virtual public meetings, email updates, bus and newspaper advertisements, social media, press releases, and 60,000 draft service plan brochures in multiple languages placed on buses.

During Phase Two of the public outreach period from May 23, 2022 to July 25, 2022 – OCTA received more than 8,500 customer comments and in-person public engagements on the Plan, including 4,885 online and print survey responses, 1,235 contacts at community events, and 1,830 engagements with staff bus ride-alongs.

The customer feedback survey/comment card was distributed online, using email and social media, and was also available in print brochures onboard buses and was distributed to local jurisdictions, community organizations, and social service centers.

Key Findings

As a result of the ongoing public involvement program, a number of themes have emerged. The following themes were identified as key findings:

Most Respondents Support the Proposed Bus Service Plan

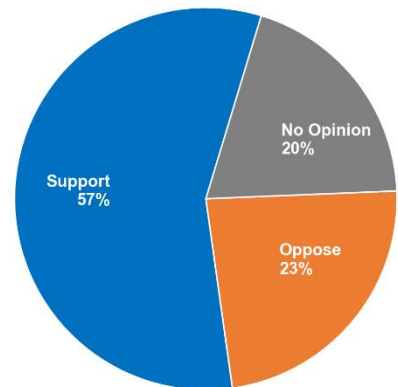
Respondents were asked to select up to four of their most frequently used OCTA routes and to indicate if they support, oppose, or have no opinion on the proposed changes to each route.

A majority of survey responses (57 percent) supported the proposed changes to their routes. However, there was some opposition to some of the changes being proposed.

- Supportive comments noted:
 - New routes
 - Increased service frequency
 - Increased weekday service hours
 - Increased weekend service hours

Some responses (22 percent) disagreed with the Plan.

- Negative comments noted:
 - Route modifications, including removed segments
 - Discontinuation of routes or limited stop service



n=9,885 responses from 4,128 respondents
(multiple responses possible)

Route-Specific Feedback

As shown below, some of the proposed types of changes within the Plan had a higher percentage of supportive responses. Generally, changes that included only improvements (such as increased frequency or hours of service) had the highest percentage of supportive comments. Accordingly, route improvements that included improvements to frequency, weekday, or weekend hours, and no changes to alignment or routing had the highest support level (66 percent). This was followed by proposals to add new routes (62 percent).

Overall Route Responses by Types of Change

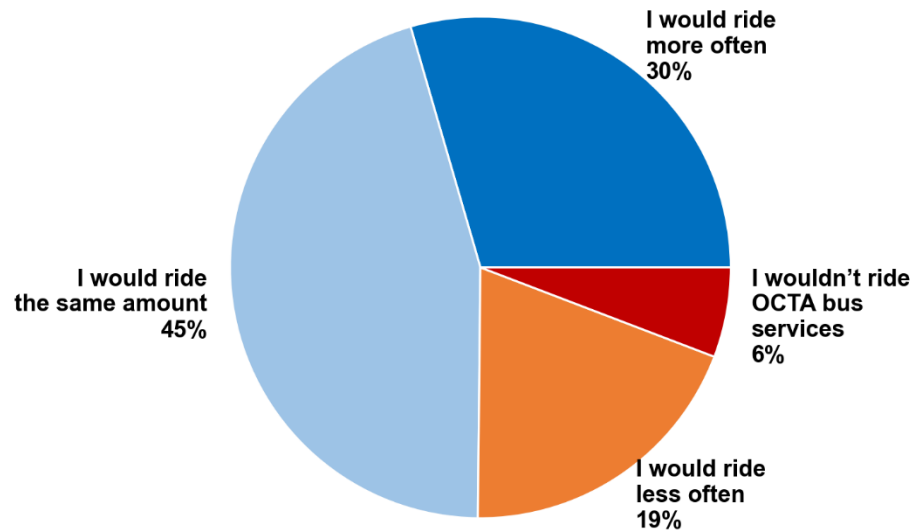
Route Change Summary	Support %	No Opinion %	Oppose %	Total Responses
Route Improvements (including frequency, weekday hours, and/or weekend hours) with no alignment changes	66%	18%	16%	2,423
New Routes	62%	24%	14%	139
More weekday hours and/or weekend hours, includes alignment changes	60%	20%	20%	783
Improved frequency with more weekday hours and/or weekend hours, includes alignment changes	55%	20%	25%	3,991
Changes to frequency and other adjustments including weekday / weekend hours and/or alignment changes	55%	19%	26%	1,909
Discontinued Routes	40%	22%	39%	553
No Changes	39%	36%	25%	87
Total	57%	20%	23%	9,885

Due to rounding, some percentages may not add up to 100 percent.

Draft Service Plan Impact on Ridership

If the Plan was implemented as proposed, the majority of survey respondents (75 percent) stated they would ride OC Bus either more often (30 percent) or the same amount (45 percent). The remaining respondents indicated they would ride less often (19 percent) or no longer ride OC Bus (6 percent).

Overall Route Feedback Rating Responses (Percentage Response)



n=4,054 respondents

Background

OCTA provides transit service to Orange County, including more than 50 OC Bus routes, OC ACCESS paratransit service, one OC Flex zone, and connections to other local and regional transit providers.

OCTA periodically conducts a systemwide analysis of ridership and performance trends. This analysis is utilized to recommend transit service modifications to improve performance, grow ridership, and/or align bus service to better meet demand and agency goals. OCTA last completed a systemwide review in 2012, with those recommendations implemented as part of OC Bus 360° between 2016-2018. These changes focused on enhancing service primarily in OCTA's central urban core area, where resources would support additional ridership and improved productivity.

During the last decade, OC Bus ridership has been declining, mirroring regional and national trends. The change in ridership was exacerbated in the previous two years due to COVID-19 and the state's stay-at-home orders, which dramatically changed travel patterns and significantly decreased ridership during the pandemic. OC Bus ridership decreased from approximately 125,000 average weekday boardings before the pandemic to the low 30,000s in April 2020. Ridership has been steadily increasing in early 2022 and reached more than 100,000 average weekday boardings once school resumed in August 2022, the highest level since the pandemic began and about 20 percent below pre-pandemic levels.

It is clear that COVID-19 has affected transit travel patterns and demand levels; however, the long-term effects remain to be seen. OCTA initiated the Making Better Connections Study in the summer of 2021 to align OC Bus service plans with emerging transit demand and travel patterns. Transit performance, ridership, countywide multimodal travel trends, and customer input have all been evaluated to form the Plan. Phase One of the public involvement program, which was used to develop the Plan, included outreach at community events, outreach to diverse communities, a virtual meeting, survey input from OCTA coach operators, and a transit rider survey that was available online, shared onboard buses, and on the project website.

The following is a summary of the general feedback received during Phase One of the public involvement plan:

- More frequent service was the most requested improvement, followed by service reliability (on-time performance).
- Most respondents asked for more frequent service during the midday (9 AM to 3 PM) over more frequent peak service (6 AM to 9 AM and 3 PM to 6 PM).
- Most respondents said they preferred a faster ride on the bus, even if that involved a longer walk to the bus stop (meaning fewer bus stops), rather than a shorter walk to a bus stop, but a slower ride.
- On average, respondents were willing to wait up to 20 minutes for a transfer.

The project team used the information gathered from the public, coach operators, and transit performance and travel data analysis to develop the Plan.

The Plan will improve passenger travel time by increasing bus service frequencies in high-demand areas and implementing timed transfers at two transportation hubs within the County. While the Plan maximizes available resources, it also aligns the transit service to market demand by concentrating and improving service in the core areas of the County. Staff further refined the initial set of recommendations by applying on-the-ground operational experience and known customer needs.

These changes are considered "major service changes" under Federal Transit Administration (FTA) Title VI, which require OCTA to conduct a public involvement program, including a public hearing prior to Board approval. This included meaningful, equitable, and inclusive participation from the public, consistent with policy requirements, including outreach to diverse and hard-to-reach communities.

In May 2022, the Board directed staff to implement Phase Two of the public involvement program, which included gathering feedback on the Plan. Goals for Phase Two included sharing the Plan using a variety of tactics and seeking comprehensive and meaningful public input on proposed route changes.

This final Public Involvement Program Report reflects outreach tactics and what we have heard from the public, customers, and other stakeholders on the Plan.

Summary of Changes in the Making Better Connections Study Draft Service Plan

The Plan includes a set of recommendations for OC bus routes and service that maximize service efficiency while minimizing impacts to the transit riders. In total, the proposed changes:

- Increase the number of bus trips by 16 percent on weekdays, by 8 percent on Saturdays, and by 13 percent on Sundays, compared to existing service levels
- Operate the top 10 OC Bus route corridors on a frequency of every 10 to 15 minutes from 6 AM to 6 PM
- Offer more frequent service of 30 minutes or better on 38 routes in the core service area
- Operate 9 routes on a frequency between 30 and 60 minutes
- Provide timed transfers at the Laguna Hills Transportation Center for south Orange County connections and at the Brea Mall for north Orange County connections
- Implement a new route 164 in the City of Irvine along Irvine Boulevard
- Implement a new Bravo! Route 553 on Main Street (to be implemented in October 2022 for air quality attainment purposes)
- Permanently discontinue 5 express routes (currently suspended)
- Discontinue 1 Stationlink route and 3 local routes
- Expand service hours, modify route alignments, or discontinue unproductive routes or route segments on other routes

A summary of proposed changes to individual routes is provided with the Plan brochure, available online or in print.

Public Involvement Program

On May 23, 2022, the Board received the Plan and directed staff to implement a public involvement program to solicit feedback.

The public involvement program included a broad range of communication methods to reach a wide audience, provide information, solicit participation and input, and allow ongoing feedback. The outreach effort was equitable, inclusive, and accessible to the needs of diverse stakeholder populations and adhered to guidelines required to meet FTA public hearing and Title VI mandates.

Tactics

The following tactics and activities were completed in Phase Two. Unless otherwise noted, all materials were in English, Spanish, and Vietnamese.

Bus Advertisements and Collateral

- 60,000 public notice multilingual booklets were placed on all buses, which included a mail-back survey
- Interior bus cards (550 of each language for a total of 1,650)

Print Advertisements

- Four newspaper ads, including Excelsior, Người Việt, OC Register, and Việt Báo

Digital Information

- Dedicated website including an online survey
- Email blasts regarding the Plan and in-person/virtual community meetings
- OCTA's *On the Move* e-Newsletter (English)
- Public information and ads on social media (Facebook, Twitter, and Instagram)

In-Person Rider Outreach

- Bus ride-along on 13 routes in core service areas matched real riders with multilingual outreach staff in English, Spanish, and Vietnamese
- Twenty-two pop-up events at transportation centers (with 2 pop-ups per location), markets, and cultural events staffed with English/Spanish/Vietnamese speaking staff

School Outreach

Communications toolkits were provided to all 28 Orange County K-12 school districts and all 9 community colleges to share with students, parents and staff. An email to K-12 school staff shared resources and encouraged sharing the Plan materials via parent communications, newsletters, and social media as well as with relevant groups, including parent teacher associations and district English learner advisory committees (DELAC).

Employer Outreach

Communications toolkits were provided to 318 Orange County employers to share with their employees.

Community Events & Organizations

- Community and cultural events – OC Green Expo and CalFresh Resource Fair in the City of Anaheim (June 11, 2022), CalOptima Resource Fair (June 18, 2022), the Juneteenth Festival in the City of Santa Ana (June 18, 2022), and other cultural and Pride events throughout June
- Pop-up events at supermarkets, shopping areas, community centers, and other gathering spaces
- Communications to ethnic chambers of commerce and other business organizations, including CalOptima, the Latino Health Access, OC Human Relations, the LGBTQ Center OC, the Orange County Asian Pacific Islander Community Alliance, and other organizations to reach community members and constituents

In-person/Virtual Community Meetings

Several meetings took place in person and virtually, where customers and the public had the opportunity to discuss the proposed changes and provide input. Spanish and Vietnamese translators were accessible as needed for attendees.

- Laguna Hills Community Center (June 14, 2022)
- Virtual Zoom Meeting (June 15, 2022)
- Santa Ana Senior Center (June 16, 2022)

Local Jurisdiction Communication

The public information officers and communication staff from 34 cities and the County of Orange were notified of the Plan and were provided a digital toolkit to disseminate information via city communication channels. In addition, one-on-one staff briefings were offered to all local jurisdictions and completed with the cities of Fullerton, Irvine, Mission Viejo, and Rancho Santa Margarita. Additionally, the Plan was presented to attending city staff at the Planning Directors' Forum, a virtual meeting held on July 21, 2022.

Public Comments – Email, Phone Calls, and Social Media

Public comments were collected from multiple channels, including phone calls to the Customer Information Center, emails, and social media comments to OCTA Customer Relations.

Public social media discussion was also considered as a source of public comments. This included an organic online discussion of the Draft Service Plan found on Reddit.com within the Orange County community subreddit.

Local News Media

A press release was issued to local media notifying the community about the proposed service change and public involvement program.

OCTA Advisory Committees

The Making Better Connections Draft Service Plan was presented at the following OCTA advisory committee meetings. Committee members received a presentation of the proposed service changes and were able to provide feedback on behalf of their respective constituencies.

- Citizen Advisory Committee Meeting (July 19, 2022)
- Diverse Community Leaders Group Meeting (July 20, 2022)
- Accessible Transit Advisory Committee Meeting (July 26, 2022)

Public Hearing

OCTA Headquarters, Orange (July 25, 2022)

The public hearing to allow individuals to comment publicly on the Making Better Connections Study Draft Service Plan took place at the OCTA Headquarters on July 25, 2022. A total of eleven comments were received, including both spoken and email comments received for the public hearing and entered into the record.

Online and Print Survey

A qualitative online and print survey was distributed for customer and public feedback on the Plan. The online survey was available at OCbus.com and was widely publicized in an email blast, social media postings, and other materials. The print version of the survey (without optional demographic questions) was included with a pre-paid postage response card attached to each of the 60,000 service plan brochures that were distributed onboard OC Bus, at events, and to community centers.

What We Heard

Following extensive public outreach, more than 8,500 comments and in-person public engagements have been received on the Plan, from in-person and virtual community meetings and events, online/print surveys, and by email and phone. Figure 1 shows the number of channels and count of respondents/engagements.

Figure 1: Feedback by Channel

Channel	Count
Online/Print Surveys	4,885
Onboard Ride-Along Engagements (estimated)	1,830
Community Event Engagements at OCTA Booths (estimated)	1,235
Transit Center Pop-Up Event Attendees (estimated)	318
Customer Relations (Calls, Emails, and Social Media)	185
In-person/Virtual Community Meeting Attendees	97
Public Hearing Comments	11
Total	8,561

Online and Print Survey Results

The online and print feedback survey was released on May 23, 2022, to gather public input on the Plan. From May 23, 2022, to July 25, 2022, OCTA collected a total of 4,885 survey responses during the public outreach period. The survey was offered in English, Spanish, and Vietnamese, with 95 percent of respondents completing the survey in English, 4.3 percent in Spanish, and less than 1 percent in Vietnamese.

The survey results are considered informal and qualitative rather than statistically significant, as the sample size is small, and participants were self-selected. Informal research such as this survey is useful to explore a group's opinions and views, allowing for the collection of rich and verifiable data. This data can reveal information that may warrant further study and is often a cornerstone for developing new ideas. The print survey instrument is attached as Appendix A of this report.

Survey Respondents

Optional demographic questions were included as part of the online survey to confirm that a varied cross-section of Orange County residents and OC Bus riders responded to the survey. Note that demographic questions were not included in print versions of the survey due to space requirements and may therefore underreport in-person outreach using print surveys, including ethnic community events.

Figure 2: Respondent Race/Ethnicity Compared to 2020 United States (US) Census Statistics for Orange County¹

What ethnic group do you consider yourself a part of or feel closest to?	2020 Census Population	Online Survey Respondents
White	37.6%	36.8%
Hispanic or Latino	34.1%	27.6%
Asian – Korean, Japanese, Chinese, Vietnamese, Filipino or other Asian	21.9%	16.3%
Mixed Race	3.9%	5.2%
Black or African American	1.6%	6.0%
Other	0.5%	0.1%
Native American or Alaska Native	0.2%	2.4%
Pacific Islander	0.2%	1.6%
Middle Eastern	n/a	4.1%

n = 3,152 Respondents

Comparing reported demographic information illustrates that the respondent race/ethnicity distribution is similar to 2020 Census statistics for the Orange County population (Figure 2), indicating that the survey, while not statistically representative, does generally reflect the representative racial demographics of Orange County.

For this comparison, US Census data for Orange County was recalculated to include the "Hispanic or Latino" as a race/ethnicity category rather than a separate question regarding ethnicity. Some demographic groups had a lower percentage of overall survey responses compared to the 2020 US Census statistics, such as Hispanic, Latino, or Asian. Additionally, some demographic groups (particularly with small percentages) had a higher percentage of

¹ Source: "P2 HISPANIC OR LATINO, AND NOT HISPANIC OR LATINO BY RACE - 2020: DEC Redistricting Data - Orange County, California". [United States Census Bureau](#)

responses compared to 2020 US Census statistics. Some of this variability may be due to how the US Census groups some races / ethnicities, such as Middle Eastern, into more general identifiers.

Current Usage of OC Bus

Survey respondents were asked about their current usage of OC Bus and then grouped into categories of current, former, and non-riders (Figure 3). Due to rounding, some percentages may not add up to 100 percent.

The majority of survey respondents who answered the question (90 percent) were current OC Bus customers, with the largest rider group being frequent riders (37 percent) using OC Bus 4-7 days per week. This suggests that the survey successfully gathered feedback from current OC Bus customers. The remaining responses include former riders (7 percent) and individuals that have never used OC Bus (2 percent).

Figure 3: Respondent Rider Status

		Respondents	Respondent %
Rider Type	Rider Usage		
Current Riders	4-7 days per week	1,525	37%
	1-3 days per week	1,143	27%
	1-3 times per month	693	17%
	Less than once per month	399	10%
	<i>Subtotal</i>	<i>3,760</i>	<i>90%</i>
Former Riders	None, but I have previously used OC Bus	309	7%
Non-Riders	None, I have never used OC Bus	99	2%
Total		4,168	100%

n = 4,168 Respondents

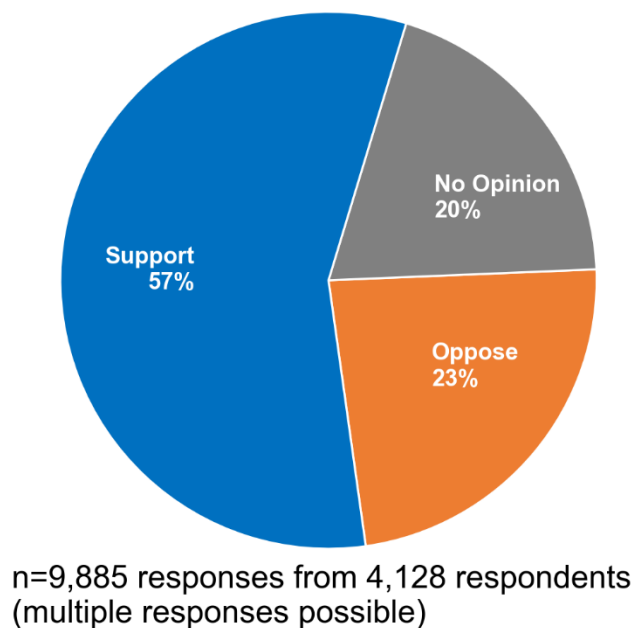
Unless otherwise noted, rider status was not used to filter other responses from a survey respondent, including their additional feedback on the draft plan. As one of the goals of the Making Better Connections Study is to increase ridership, even non-riders may have feedback – ideally turning them into future riders.

Feedback on the Proposed Route Changes

To gather feedback on the proposed changes as part of the Plan, survey respondents were asked to select up to 4 OC Bus routes and indicate if they supported, opposed, or had no opinion on the proposed changes to each route. Details on the proposed changes were included within the Proposed Bus Service Plan booklet in both online and print versions of the survey.

Figure 4 shows the overall route feedback rating responses as a percentage of all route responses. Most responses supported the proposed changes to individual routes (57 percent). Some responses (23 percent) opposed the proposed changes, and the remainder (20 percent) had no opinion on the proposed changes.

Figure 4: Overall Route Feedback Responses (Percentage Response)



A total of 4,128 unique respondents provided 9,885 route feedback responses. On average, each respondent provided feedback on an average of 2.4 routes, allowing respondents flexibility in providing feedback on multiple routes.

Additionally, respondents were able to provide an open-ended response on any route, including routes with no changes, or on the overall bus restructuring plan. Additional analysis was conducted to identify the factors that contributed to respondents' feedback on the proposed changes.

Rider Response to the Plan

A majority of survey respondents who identified as current riders (58 percent) supported the Plan, with 23 percent opposing and 16 percent having no opinion. As current riders made up such a large percentage of survey respondents, the overall feedback on the Plan is largely similar to the responses from current rider group. Support for the Plan was consistent across current rider usage frequencies of greater than one trip per month but dropped to 48 percent support for those riding less than once a month.

Former OC Bus riders were the most likely group surveyed to have no opinion on the proposed Plan (33 percent), but still had just under half of the respondents supporting the proposed Plan (48 percent).

Non-riders had the highest percentage of opposition to the Plan but represented a very small percentage of respondents (5 percent) who both reported they had not used OC Bus but also provided feedback on proposed route changes.

Figure 5: Route Feedback by Rider Type

Rider Type	Rider Usage	Response to Draft Plan	Support %	No Opinion %	Oppose %	Total Responses	Total Respondents
Current Riders	4-7 days per week		58%	16%	26%	3,716	1,471
	1-3 days per week		61%	20%	20%	2,759	1,098
	1-3 times per month		57%	23%	21%	1,621	650
	Less than once per month		48%	28%	24%	818	359
	<i>Subtotal</i>			<i>58%</i>	<i>19%</i>	<i>23%</i>	<i>8,914</i>
Former Riders	None, but I have previously used OC Bus		48%	33%	19%	352	194
Non-Riders	None, I have never used OC Bus		28%	28%	44%	25	18
Total Respondents			57%	20%	23%	9,291	3,790

Response Based on Proposed Changes

In order to identify the factors that may influence respondents' support of the proposed changes, they were grouped into (mutually exclusive) categories. One key factor was determined to be whether the proposed changes included any routing or alignment changes (including segment deletions or route truncations). These categories included:

Changes that do not include proposed routing or alignment changes:

- Adding new routes (proposed for 2 routes)
- Route improvements to frequency, weekday hours, and/or weekend hours. These routes have no proposed changes to current routing or alignment (proposed for 11 routes).
- Routes with no changes (proposed for 1 route)².

Changes including proposed routing or alignment changes:

- Routes with improved frequency, which may also include weekday hours and/or weekend hours. These routes include routing or alignment changes (proposed for 19 routes)
- Improvements to weekday hours and/or weekend hours. All routes include routing or alignment changes (proposed for 3 routes)
- Changes (improvements and/or reductions) to frequency, weekday hours, and/or weekend hours. Some routes in this category also include alignment changes (proposed for 9 routes)
- Discontinuation of routes (proposed for 9 routes)

As shown in Figure 6, some of the proposed changes within the Plan had a higher percentage of supportive responses. Generally, changes that included only improvements (such as increased frequency or hours of service) with no alignment changes had the highest percentage of supportive responses. Accordingly, route improvements that included some or all improvements to frequency, weekday, or weekend hours had the highest percentage of supportive responses (66 percent), followed by the proposal to add new routes (62 percent).

Proposed changes that included routing or alignment changes (including the deletion of route segments) generated a much more mixed response in the percentage of supportive responses. Changes that included route alignment changes had lower average support percentages – even when other changes were all improvements to a route. Adding additional weekday and/or weekend hours (including alignment changes) had a slight majority of

² Routes with no proposed changes in the Plan did not allow a survey respondent to select support/oppose/no opinion, as there were no changes to respond to. Route 85 was included in the Service Change Booklet and survey, as it includes scheduling changes to better connect to Laguna Niguel Transportation Center. However, it has no other substantive changes proposed.

positive responses at 60 percent. Increasing the frequency of service and adding additional weekday and/or weekend hours reported 55 percent supporting responses.

Figure 6: Overall Route Responses by Types of Change

Route Change Summary	Support %	No Opinion %	Oppose %	Total Responses
Route Improvements (including frequency, weekday hours, and/or weekend hours) with no alignment changes	66%	18%	16%	2,423
New Routes	62%	24%	14%	139
More weekday hours and/or weekend hours, includes alignment changes	60%	20%	20%	783
Improved frequency with more weekday hours and/or weekend hours, includes alignment changes	55%	20%	25%	3,991
Changes to frequency and other adjustments including weekday / weekend hours and/or alignment changes	55%	19%	26%	1,909
Discontinued Routes	40%	22%	39%	553
No Changes	39%	36%	25%	87
Total	57%	20%	23%	9,885

n=9,885 responses from 4,128 respondents (multiple responses possible)

Other factors that seem to have influenced respondents' support for proposed changes include increasing frequency, weekday and/or weekend service hours (increasing support for changes), and the elimination or reduction of Bravo! or limited stop "X" service (decreased support for changes). Proposed changes that included some reductions to frequency, service hours, and/or route alignment changes – even if some other elements of service were also improved – resulted in 55 percent support of proposed changes.

The discontinuation of routes was the category with the lowest supportive rating (40 percent) and highest opposition response (39 percent). The discontinuation of routes that had been suspended during COVID-19, routes that at this time had not been in operation for more than two years, had a lower percentage of opposition responses than the proposed discontinuation of currently operating routes. It may be that riders have found alternative options to routes that have been suspended during COVID-19. Feedback on individual routes is shown in Figure 7.

Figure 7: Individual Route Feedback Grouped by Types of Change

Response to Draft Plan	Support %	No Opinion %	Oppose %	Responses	
Summary of Route Changes	Route				
Route Improvements (including frequency, weekday hours, and/or weekend hours) with no alignment changes	Route 50 - Long Beach to Orange	76%	14%	10%	245
	Route 1 - Long Beach to San Clemente	72%	14%	14%	241
	Route 33 - Fullerton to Huntington Beach	71%	18%	11%	263
	Route 30 - Cerritos to Anaheim	69%	18%	13%	261
	Route 54 - Garden Grove to Orange	67%	17%	17%	248
	Route 57 - Brea to Newport Beach	64%	20%	16%	346
	Route 56 - Garden Grove to Orange	64%	15%	20%	157
	Route 55 - Santa Ana to Newport Beach	64%	22%	14%	269
	Route 70 - Sunset Beach to Tustin	55%	25%	20%	126
	Route 64 - Huntington Beach to Tustin	49%	20%	31%	267
New Routes	Route 553 - Anaheim to Santa Ana	89%	11%	0%	37
	Route 164 - Tustin to Irvine	52%	28%	20%	102
More weekday hours and/or weekend hours, includes alignment changes	Route 26 - Fullerton to Yorba Linda	66%	18%	16%	306
	Route 83 - Anaheim to Laguna Hills	65%	19%	16%	217
	Route 37 - La Habra to Fountain Valley	48%	24%	28%	260
Improved frequency with more weekday hours and/or weekend hours, includes alignment changes	Route 178 - Huntington Beach to Irvine	72%	15%	13%	68
	Route 25 - Fullerton to Huntington Beach	67%	20%	13%	297
	Route 89 - Mission Viejo to Laguna Beach	64%	19%	16%	196
	Route 43 - Fullerton to Costa Mesa	62%	19%	19%	427
	Route 71 - Yorba Linda to Newport Beach	59%	18%	23%	139
	Route 47 - Fullerton to Balboa	57%	19%	24%	275
	Route 53 - Anaheim to Irvine	57%	15%	28%	285
	Route 560 - Santa Ana to Long Beach	57%	11%	32%	111
	Route 35 - Fullerton to Costa Mesa	57%	21%	23%	272
	Route 167 - Orange to Irvine	57%	23%	20%	138
	Route 79 - Tustin to Newport Beach	54%	28%	18%	149
	Route 87 - Rancho Santa Margarita to Laguna Niguel	54%	19%	27%	170
	Route 72 - Sunset Beach to Tustin	51%	24%	24%	103
	Route 90 - Tustin to Dana Point	49%	39%	12%	224
	Route 42 - Seal Beach to Orange	48%	19%	32%	299
	Route 86 - Costa Mesa to Mission Viejo	47%	13%	40%	161
	Route 123 - Anaheim to Huntington Beach	46%	24%	30%	174
	Route 66 - Huntington Beach to Irvine	45%	20%	35%	253
Route 143 - La Habra to Brea	39%	13%	48%	250	

Figure 7: Individual Route Feedback Grouped by Types of Change, cont.

Response to Draft Plan		Support %	No Opinion %	Oppose %	Responses
Summary of Route Changes	Route				
Changes to frequency and other adjustments including weekday / weekend hours and/or alignment changes	Route 529 - Fullerton to Huntington Beach	69%	13%	18%	55
	Route 60 - Long Beach to Tustin	69%	18%	13%	332
	Route 46 - Long Beach to Orange	60%	18%	22%	152
	Route 59 - Anaheim to Irvine	59%	18%	23%	194
	Route 91 - Laguna Hills to San Clemente	52%	28%	20%	171
	Route 38 - Lakewood to Anaheim Hills	51%	19%	30%	230
	Route 29 - La Habra to Huntington Beach	50%	19%	31%	416
	Route 129 - La Habra to Anaheim	47%	19%	34%	144
	Route 543 - Fullerton Transportation Center to Santa Ana	46%	13%	41%	94
	Route 177 - Foothill Ranch to Laguna Hills	36%	20%	44%	121
Discontinued Routes	Route 213 - Brea to Irvine Express	69%	9%	22%	32
	Route 206 - Santa Ana to Lake Forest Express	67%	22%	11%	27
	Route 463 - Santa Ana Regional Transportation Center to Hutton Centre	64%	18%	18%	39
	Route 794 - Riverside/Corona to South Coast Metro Express	45%	24%	30%	33
	Route 701 - Huntington Beach to Los Angeles Express	44%	22%	34%	41
	Route 721 - Fullerton to Los Angeles Express	44%	25%	31%	32
	Route 82 - Foothill Ranch to Rancho Santa Margarita	34%	21%	45%	87
	Route 153 - Brea to Anaheim	33%	25%	42%	145
	Route 76 - Huntington Beach to John Wayne Airport	25%	21%	54%	117
No Changes	Route 85 - Mission Viejo to Laguna Niguel	39%	36%	25%	87
Total		57%	20%	23%	9,885

n=9,885 responses from 4,128 respondents (multiple responses possible)

Response Rate by Route

The number of responses received in comment form per route was also considered to identify any proposed route changes of high customer or public interest.

Compared to average daily weekday ridership for OC Bus from the month of August 2022, the volume of online survey responses generally correlates with the average ridership as shown by the descending orange gradient (Figure 8).

Exceptions to this trend include routes 43 and 29, which had higher volumes of survey responses than suggested solely by their daily ridership. However, these route corridors also include Bravo! routes 543 and 529, respectively, which had lower volumes of responses than suggested by their average daily ridership. Customers who use both routes on a corridor may have opted to select the more “traditional” route.

Note that average daily ridership is only shown for routes with proposed changes as part of the Plan and therefore included in online survey responses. The total reported average daily weekday ridership (for all routes) for the month was 88,128 boardings.

Figure 8: Comparing Average Ridership to Survey Responses

Route	Average Daily Weekday Ridership (August 2022)	Online Survey Responses
Route 57 - Brea to Newport Beach	7,200	346
Route 47 - Fullerton to Balboa	5,492	275
Route 66 - Huntington Beach to Irvine	5,254	253
Route 64 - Huntington Beach to Tustin	5,166	267
Route 43 - Fullerton to Costa Mesa	5,124	427
Route 53 - Anaheim to Irvine	4,428	285
Route 60 - Long Beach to Tustin	4,282	332
Route 29 - La Habra to Huntington Beach	4,065	416
Route 42 - Seal Beach to Orange	3,220	299
Route 50 - Long Beach to Orange	3,113	245
Route 55 - Santa Ana to Newport Beach	3,061	269
Route 38 - Lakewood to Anaheim Hills	2,644	230
Route 54 - Garden Grove to Orange	2,504	248
Route 37 - La Habra to Fountain Valley	2,419	260
Route 70 - Sunset Beach to Tustin	2,046	126
Route 543 - Fullerton Transportation Center to Santa Ana	1,893	94
Route 560 - Santa Ana to Long Beach	1,646	111
Route 35 - Fullerton to Costa Mesa	1,613	272
Route 83 - Anaheim to Laguna Hills	1,380	217
Route 59 - Anaheim to Irvine	1,357	194
Route 71 - Yorba Linda to Newport Beach	1,344	139
Route 46 - Long Beach to Orange	1,327	152
Route 72 - Sunset Beach to Tustin	1,316	103
Route 30 - Cerritos to Anaheim	1,190	261
Route 56 - Garden Grove to Orange	1,173	157
Route 1 - Long Beach to San Clemente	1,146	241
Route 26 - Fullerton to Yorba Linda	1,096	306
Route 91 - Laguna Hills to San Clemente	971	171
Route 25 - Fullerton to Huntington Beach	859	297
Route 529 - Fullerton to Huntington Beach	824	55
Route 79 - Tustin to Newport Beach	815	149
Route 33 - Fullerton to Huntington Beach	776	263
Route 90 - Tustin to Dana Point	757	224
Route 89 - Mission Viejo to Laguna Beach	736	196
Route 123 - Anaheim to Huntington Beach	637	174
Route 143 - La Habra to Brea	521	250
Route 167 - Orange to Irvine	494	138
Route 129 - La Habra to Anaheim	475	144
Route 86 - Costa Mesa to Mission Viejo	394	161
Route 153 - Brea to Anaheim	318	145
Route 76 - Huntington Beach to John Wayne Airport	290	117
Route 177 - Foothill Ranch to Laguna Hills	243	121
Route 178 - Huntington Beach to Irvine	236	68
Route 87 - Rancho Santa Margarita to Laguna Niguel	224	170
Route 82 - Foothill Ranch to Rancho Santa Margarita	203	87
Route 85 - Mission Viejo to Laguna Niguel	188	87
Total	86,497	9,581

Response Factors

Respondents were able to provide open-ended comments to the proposed changes on individual routes. These comments were reviewed and categorized by theme to get a sense of what factors contributed to a respondent's opinion on proposed changes. A comment may contain multiple themes. Categorized comments provided additional details for what considerations motivated respondents to either support or oppose the Plan.

The largest theme of the open-ended comments was about respondents' satisfaction with the proposal (21 percent). Some open-ended comments did not provide details about why they supported or opposed the Plan but did indicate their feelings towards the proposed changes. A total of 16 percent of the categorized responses indicated their satisfaction with the proposal, while 5 percent indicated they were not satisfied with the proposed changes.

The second largest theme of the open-ended comments was the discussion of route alignment, representing 20 percent of categorized responses. While some respondents did agree with proposed alignment and routing changes (4 percent of all categorized comments), the majority of route alignment comments opposed the proposed changes (13 percent), and 3 percent of comments asked for additional alignment/routing beyond what was proposed.

Service frequency was another significant theme of open-ended comments, with 17 percent of categorized responses. The majority of comments supported increased frequency (11 percent), noting that they appreciated the improvements and reduction of waiting time, or noted improved frequency on weekends. Routes noted in this category included routes 43, 50, 57, 59, and 60. An additional 6 percent of comments asked for further improvements in frequency.

Comments about service hours (either weekday or weekend) represented 16 percent of categorized comments, with 7 percent of responses supporting the increased service hours, particularly on weekends (3 percent) and in late evenings (2 percent). Routes noted in this category included routes 26, 30, 54, 55, and 543. Additional service hours beyond the proposed amounts were requested in 3 percent of responses.

The individual counts of categorized comments per route are shown in Figure 9 and Figure 10, specifically showing comments based on frequency, hours of service, and routing / alignment changes. As shown in Figure 9, a total of 476 open-ended comments received supported the increased frequency of the Plan or noted it as part of the reason for their support of the proposed route changes, particularly on busier routes. This was frequently and interchangeably noted as less waiting for the bus. Some of the open-ended comments also requested additional frequency beyond the proposed Plan, noted as "additional frequency needed" (184 comments). There were no comments received that requested less frequency.

Open-ended comments also were generally supportive of proposed additional hours of service, with 300 categorized comments received overall. As with increased frequency, some open-ended comments requested further increases to service hours, with 138 comments received.

Figure 9: Open-Ended Responses to Draft Plan for Frequency & Hours of Service

Route Feedback Categories		Frequency of Service		Hours of Service		
Individual Route Feedback		Additional Frequency Needed	Support of Additional Frequency Proposed	Additional Service Hours Needed	Support of Additional Hours Proposed	Less Service Hours Needed
Summary of Route Changes	Route					
Route Improvements (including frequency, weekday hours, and/or weekend hours) with no alignment changes	Route 1 - Long Beach to San Clemente	11	19	7	4	0
	Route 30 - Cerritos to Anaheim	9	12	6	15	1
	Route 33 - Fullerton to Huntington Beach	2	17	4	8	0
	Route 50 - Long Beach to Orange	3	36	1	3	1
	Route 54 - Garden Grove to Orange	4	4	3	28	0
	Route 55 - Santa Ana to Newport Beach	3	6	2	31	0
	Route 56 - Garden Grove to Orange	2	5	2	11	0
	Route 57 - Brea to Newport Beach	8	38	1	1	0
	Route 64 - Huntington Beach to Tustin	0	10	1	14	2
	Route 70 - Sunset Beach to Tustin	1	9	1	7	0
	Subtotal	43	156	28	122	4
New Routes	Route 164 - Tustin to Irvine	3	0	1	1	0
	Route 553 - Anaheim to Santa Ana	0	1	0	1	0
	Subtotal	3	1	1	2	0
More weekday hours and/or weekend hours, includes alignment changes	Route 26 - Fullerton to Yorba Linda	4	2	5	21	0
	Route 37 - La Habra to Fountain Valley	1	2	2	8	0
	Route 83 - Anaheim to Laguna Hills	3	6	1	16	2
	Subtotal	8	10	8	45	2
Improved frequency with more weekday hours and/or weekend hours, includes alignment changes	Route 25 - Fullerton to Huntington Beach	4	16	1	5	0
	Route 35 - Fullerton to Costa Mesa	2	7	2	7	0
	Route 42 - Seal Beach to Orange	2	11	5	13	0
	Route 43 - Fullerton to Costa Mesa	2	47	6	8	1
	Route 47 - Fullerton to Balboa	1	13	1	14	1
	Route 53 - Anaheim to Irvine	3	22	2	5	0
	Route 66 - Huntington Beach to Irvine	0	9	0	3	1
	Route 71 - Yorba Linda to Newport Beach	6	16	2	5	1
	Route 72 - Sunset Beach to Tustin	2	5	0	3	0
	Route 79 - Tustin to Newport Beach	6	14	3	3	0
	Route 86 - Costa Mesa to Mission Viejo	0	5	1	4	0
	Route 87 - Rancho Santa Margarita to Laguna Niguel	2	4	2	2	0
	Route 89 - Mission Viejo to Laguna Beach	1	10	4	1	0
	Route 90 - Tustin to Dana Point	0	8	1	3	0
	Route 123 - Anaheim to Huntington Beach	1	2	2	2	0
	Route 143 - La Habra to Brea	4	14	0	8	0
	Route 167 - Orange to Irvine	1	4	1	6	0
	Route 178 - Huntington Beach to Irvine	1	6	1	2	0
	Route 560 - Santa Ana to Long Beach	2	7	4	4	0
	Subtotal	40	220	38	98	4

Respondents were able to provide open-ended comments to the proposed changes on individual routes. These comments were reviewed and categorized by theme to get a sense of what factors contributed to a respondent's opinion on proposed changes. A comment may contain multiple themes. Categorized comments provided additional details for what considerations motivated respondents to either support or oppose the Plan.

The largest theme of the open-ended comments was about respondents' satisfaction with the proposal (21 percent). Some open-ended comments did not provide details about why they supported or opposed the Plan but did indicate their feelings towards the proposed changes. A total of 16 percent of the categorized responses indicated their satisfaction with the proposal, while 5 percent indicated they were not satisfied with the proposed changes.

The second largest theme of the open-ended comments was the discussion of route alignment, representing 20 percent of categorized responses. While some respondents did agree with proposed alignment and routing changes (4 percent of all categorized comments), the majority of route alignment comments opposed the proposed changes (13 percent), and 3 percent of comments asked for additional alignment/routing beyond what was proposed.

Service frequency was another significant theme of open-ended comments, with 17 percent of categorized responses. The majority of comments supported increased frequency (11 percent), noting that they appreciated the improvements and reduction of waiting time, or noted improved frequency on weekends. Routes noted in this category included routes 43, 50, 57, 59, and 60. An additional 6 percent of comments asked for further improvements in frequency.

Comments about service hours (either weekday or weekend) represented 16 percent of categorized comments, with 7 percent of responses supporting the increased service hours, particularly on weekends (3 percent) and in late evenings (2 percent). Routes noted in this category included routes 26, 30, 54, 55, and 543. Additional service hours beyond the proposed amounts were requested in 3 percent of responses.

The individual counts of categorized comments per route are shown in Figure 9 and Figure 10, specifically showing comments based on frequency, hours of service, and routing / alignment changes. As shown in Figure 9, a total of 476 open-ended comments received supported the increased frequency of the Plan or noted it as part of the reason for their support of the proposed route changes, particularly on busier routes. This was frequently and interchangeably noted as less waiting for the bus. Some of the open-ended comments also requested additional frequency beyond the proposed Plan, noted as "additional frequency needed" (184 comments). There were no comments received that requested less frequency.

Open-ended comments also were generally supportive of proposed additional hours of service, with 300 categorized comments received overall. As with increased frequency, some open-ended comments requested further increases to service hours, with 138 comments received.

Figure 9: Open-Ended Responses to Draft Plan for Frequency & Hours of Service, cont.

Route Feedback Categories		Frequency of Service		Hours of Service		
Individual Route Feedback		Additional Frequency Needed	Support of Additional Frequency Proposed	Additional Service Hours Needed	Support of Additional Hours Proposed	Less Service Hours Needed
Summary of Route Changes	Route					
Changes to frequency and other adjustments including weekday / weekend hours and/or alignment changes	Route 29 - La Habra to Huntington Beach	19	7	1	7	0
	Route 38 - Lakewood to Anaheim Hills	8	3	5	11	1
	Route 46 - Long Beach to Orange	8	3	1	1	0
	Route 59 - Anaheim to Irvine	18	30	3	5	1
	Route 60 - Long Beach to Tustin	4	29	1	2	0
	Route 91 - Laguna Hills to San Clemente	7	2	2	6	0
	Route 129 - La Habra to Anaheim	4	0	0	1	0
	Route 177 - Foothill Ranch to Laguna Hills	5	0	14	0	0
	Route 529 - Fullerton to Huntington Beach	3	2	1	0	0
	Route 543 - Fullerton Transportation Center to Santa Ana	0	5	18	0	1
	Subtotal	76	81	46	33	3
Discontinued Routes	Route 76 - Huntington Beach to John Wayne Airport	0	0	1	0	0
	Route 153 - Brea to Anaheim	2	0	1	0	0
	Subtotal	2	0	2	0	0
No Changes	Route 85 - Mission Viejo to Laguna Niguel	2	2	4	0	0
	Route 150 - Santa Ana to Costa Mesa	6	5	6	0	0
	Route 453 - Orange Transportation Center to St. Joseph's Hospital	2	0	0	0	0
	Route 473 - Tustin Metrolink Station to UCI	1	0	5	0	0
	Route 862 - Downtown Santa Ana Shuttle	1	1	0	0	0
	Subtotal	12	8	15	0	0
Total Responses		184	476	138	300	13

Feedback on changes with routing / alignment changes or the elimination of routes (Figure 10), resulted in open-ended comments that suggested the alignment changes were a common factor in responses opposing proposed changes. A total of 460 comments were opposed to proposed rerouting or alignment changes.

While alignment changes were the most common open-ended reason provided for opposing a change, there was evidence within comments that respondents were considering the tradeoffs between alignment changes and improved frequency or hours of service. A total of 161 of the comments noted their support of the proposed alignment changes.

Figure 10: Open-Ended Responses to Draft Plan for Routing / Alignment

Route Feedback Categories		Routing / Alignment			
Individual Route Feedback		Additional Alignment / Routing Needed	Agree with proposed alignment	Oppose Proposed Alignment	Oppose Route Elimination
Summary of Route Changes	Route				
Route Improvements (including frequency, weekday hours, and/or weekend hours) with no alignment changes	Route 1 - Long Beach to San Clemente	2	0	0	0
	Route 30 - Cerritos to Anaheim	1	2	3	0
	Route 33 - Fullerton to Huntington Beach	2	0	0	0
	Route 50 - Long Beach to Orange	1	2	1	0
	Route 54 - Garden Grove to Orange	0	1	0	0
	Route 55 - Santa Ana to Newport Beach	1	1	2	0
	Route 56 - Garden Grove to Orange	1	0	1	0
	Route 57 - Brea to Newport Beach	2	3	8	0
	Route 64 - Huntington Beach to Tustin	3	2	17	0
	Route 70 - Sunset Beach to Tustin	0	0	2	0
	Subtotal	13	11	34	0
New Routes	Route 164 - Tustin to Irvine	3	1	0	0
	Subtotal	3	1	0	0
More weekday hours and/or weekend hours, includes alignment changes	Route 26 - Fullerton to Yorba Linda	5	9	16	0
	Route 37 - La Habra to Fountain Valley	5	5	20	0
	Route 83 - Anaheim to Laguna Hills	1	11	3	0
	Subtotal	11	25	39	0
Improved frequency with more weekday hours and/or weekend hours, includes alignment changes	Route 25 - Fullerton to Huntington Beach	1	5	4	0
	Route 35 - Fullerton to Costa Mesa	1	2	8	0
	Route 42 - Seal Beach to Orange	1	8	36	0
	Route 43 - Fullerton to Costa Mesa	2	11	35	0
	Route 47 - Fullerton to Balboa	3	8	18	0
	Route 53 - Anaheim to Irvine	4	15	38	0
	Route 66 - Huntington Beach to Irvine	3	5	35	0
	Route 71 - Yorba Linda to Newport Beach	2	6	8	0
	Route 72 - Sunset Beach to Tustin	1	1	0	0
	Route 79 - Tustin to Newport Beach	0	3	8	0
	Route 86 - Costa Mesa to Mission Viejo	3	0	31	0
	Route 87 - Rancho Santa Margarita to Laguna Niguel	0	0	16	0
	Route 89 - Mission Viejo to Laguna Beach	0	2	4	0
	Route 90 - Tustin to Dana Point	0	4	3	0
	Route 123 - Anaheim to Huntington Beach	3	2	19	0
	Route 143 - La Habra to Brea	5	2	6	0
	Route 167 - Orange to Irvine	3	5	14	0
	Route 178 - Huntington Beach to Irvine	3	3	3	0
	Route 560 - Santa Ana to Long Beach	1	2	16	0
Subtotal	36	84	302	0	

Figure 10: Open-Ended Responses to Draft Plan for Routing / Alignment, cont.

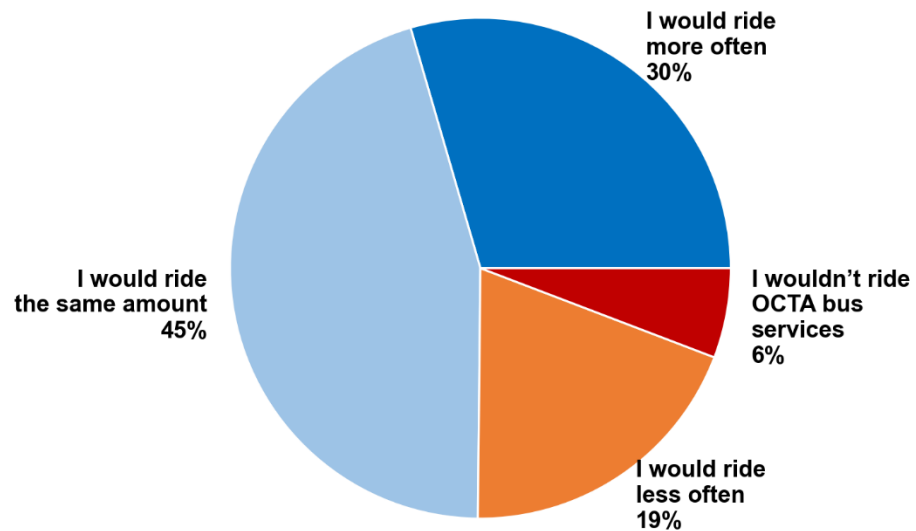
Route Feedback Categories		Routing / Alignment			
Individual Route Feedback		Additional Alignment / Routing Needed	Agree with proposed alignment	Oppose Proposed Alignment	Oppose Route Elimination
Summary of Route Changes	Route				
Changes to frequency and other adjustments including weekday / weekend hours and/or alignment changes	Route 29 - La Habra to Huntington Beach	2	5	27	0
	Route 38 - Lakewood to Anaheim Hills	5	7	17	0
	Route 46 - Long Beach to Orange	0	2	4	0
	Route 59 - Anaheim to Irvine	5	7	0	0
	Route 60 - Long Beach to Tustin	2	3	4	0
	Route 129 - La Habra to Anaheim	1	0	20	0
	Route 177 - Foothill Ranch to Laguna Hills	1	2	10	0
	Route 529 - Fullerton to Huntington Beach	3	1	2	0
	Route 543 - Fullerton Transportation Center to Santa Ana	2	0	1	0
	Subtotal	21	27	85	0
Discontinued Routes	Route 76 - Huntington Beach to John Wayne Airport	0	2	0	28
	Route 82 - Foothill Ranch to Rancho Santa Margarita	1	0	0	15
	Route 153 - Brea to Anaheim	0	6	0	34
	Route 206 - Santa Ana to Lake Forest Express	0	1	0	4
	Route 213 - Brea to Irvine Express	0	0	0	1
	Route 463 - Santa Ana Regional Transportation Center to Hutton Centre	0	1	0	4
	Route 701 - Huntington Beach to Los Angeles Express	0	2	0	8
	Route 721 - Fullerton to Los Angeles Express	0	1	0	8
	Route 794 - Riverside/Corona to South Coast Metro Express	0	0	0	5
Subtotal	1	13	0	107	
No Changes	Route 85 - Mission Viejo to Laguna Niguel	1	0	0	0
	Route 150 - Santa Ana to Costa Mesa	1	0	0	0
	Route 472 - Tustin Metrolink Station to Irvine Business	1	0	0	0
	Route 473 - Tustin Metrolink Station to UCI	2	0	0	0
	Subtotal	5	0	0	0
Total Responses		90	161	460	107

The elimination of routes, several of which have not resumed following COVID-19, was opposed in a total of 107 comments. The majority of comments that opposed route elimination were addressed to routes that are currently in operation, with limited responses to suspended routes.

Expected Ridership with Draft Service Plan

If the proposed Plan were to be implemented, seventy-five percent of respondents stated they would ride OC Bus either more often (29 percent) or the same amount (45 percent) as they currently do, compared with 19 percent who indicated they would ride less often. Approximately 6 percent of respondents said they would not ride OCTA bus services (Figure 11).

Figure 11: Intent to Ride OC Bus



n=4,054 respondents

Other Sources of Public Input

In-person/Virtual Community Meetings

Two in-person and one virtual meeting took place where customers and the public had the opportunity to discuss the proposed changes and provide input. A total of 23 customers participated in three community meetings. Spanish and Vietnamese-speaking staff were available for language assistance as needed for meetings.

- Laguna Hills Community Center (June 14, 2022)
- Virtual Meeting (June 15, 2022)
- Santa Ana Senior Center (June 16, 2022)

A summary of public comments received from the community meetings is listed below. During the meetings, customers noted that they appreciated the opportunity to provide feedback about the proposed bus service changes. A common concern shared was the reduction or discontinuation of certain bus routes, particularly in south Orange County. Some of the concerns were that it would remove service needed for schools and senior destinations.

Comments heard included:

- Opposition to route eliminations, including discussion of areas impacted, such as Irvine Valley College (Route 66), Trabuco Hills High School and Rancho Santa Margarita (Route 82), Moulton Parkway, Irvine, University of California Irvine, and the Irvine Metrolink Station (Routes 86 and 87)
- Concern that Route 60 routing changes may impact Westminster High School students
- Concern about connections in Foothill Ranch between routes 85 and 89
- Concern that the discontinuation of Route 123 will lead to crowding on Route 26 between Downtown Fullerton, California State University Fullerton (CSUF), and Fullerton College
- Suggestion to combine routes 85 and 87 as they serve a similar area
- Requesting additional service hours on Route 177 to connect with Route 89 and other Laguna Hills Transportation Center routes
- Requesting additional Bravo! route service, including weekend service and an extended route (Route 543) or a new Bravo! route (along Katella Avenue)

Public Comments – Email, Phone Calls, and Social Media

Customers were able to provide feedback on the Plan by calling or emailing the Customer Information Center and sending comments to OCTA Customer Relations. A total of 66 comments have been received and summarized below.

Customer Relations comments received included:

- Requesting the continuation of express routes (routes 701 and 794)
- Concern over route changes that would affect service to areas, including La Habra and Buena Park (routes 29 and 37), Seal Beach (Route 42), Tustin Legacy (Route 72), Rancho Santa Margarita (Route 87), and CSUF/Brea Mall (Route 153)
- Concern over alignment changes that would affect destinations beyond the proposed terminus of routes, including the City of Santa Ana in the MacArthur area (Route 53) and Fullerton College (Route 123).
- Opposition to removal of weekend service to Irvine (Route 177)
- Opposition to the elimination of routes (Route 76)
- Concern over possible OC ACCESS service area impacts based on the elimination of Route 153
- Opposition over proposed alignment changes to travel Placentia Avenue rather than Bradford Avenue (Route 26).

Public social media discussion was also considered for feedback on the Plan. Several survey respondents noted that they had learned about the Plan from Reddit.com, a social media site. Staff found discussion underway from the members of the Orange County community regarding the draft plan, attached as Appendix I.

Comments included:

- Concern over proposed service reductions in south Orange County, including service to destinations such as John Wayne Airport and UCI
- Concern about the proposed discontinuation of Route 66 serving Irvine Valley College
- Comments about infrequent and unreliable bus service, along with an inconsistent schedule, currently discouraging riders from using the bus. Commenters also expressed frustration with waiting more than an hour for the bus and suggested that OCTA uses low ridership on impacted routes as an excuse to eliminate those routes.
- Some comments said there were improvements in the proposed service plan to better connect with Metrolink stations, transit hubs, and airport terminals. However, they noted it did not resolve connection issues with other modes of transportation and requested additional coordination and alignment between bus and other transit modes.

- Suggestions to improve payment options between OC Bus, Metrolink and Amtrak so that transferring from OC Bus to Metrolink and Amtrak (rather than from Metrolink/Amtrak to OC Bus) does not require an additional ticket purchase
- Some comments noted they were concerned about safety and security while waiting and riding a bus, saying that loud and aggressive passengers make the ride feel uncomfortable and unsafe

Local Jurisdiction Communication

In order to communicate with all stakeholders and ensure the public had an opportunity to provide feedback, Phase Two of the public involvement program included communications to all Orange County cities. City staff was also offered one-on-one presentations from OCTA staff with a specific focus on changes within their jurisdiction. Presentations were provided as requested to city staff in the cities of Fullerton, Irvine, Mission Viejo, and Rancho Santa Margarita.

These are the key themes expressed by cities:

- City staff generally support the route-level recommendations and recognize the need and logic to restructure the bus system
- Staff want to make sure OCTA used solid data and analysis to support the Plan when it involves the elimination of service
- City staff were engaged and asked numerous questions. Staff were appreciative that OCTA is providing residents in their cities ample time and opportunity to review and comment on the proposed changes

OC Bus Ride-Along

To directly reach current OC Bus riders, staff conducted a series of bus ride-alongs onboard 13 routes in the core service areas of Orange County from June 13 through July 9. Staff provided copies of the Making Better Connection Feedback Survey and encouraged feedback and discussion from riders. Riders expressed appreciation for the short and straightforward rider survey. Staff conducted ride-alongs on some of OCTA's busiest bus routes, including routes 29, 43, 66, and 89.

Transit Center Pop-Up Events

To directly gather feedback on the Plan from current OC Bus riders staff conducted several pop-up events at busy transit centers in Orange County. Staff participated in pop-up events at:

- Santa Ana Regional Transportation Center (June 13 and 15, 2022)
- Orange Metrolink Station (June 14 and 16, 2022)

- Goldenwest Transportation Center (June 20 and 22, 2022)
- Laguna Hills Transportation Center (June 21 and 23, 2022)
- Fullerton Park and Ride (June 27 and 29, 2022)
- Fullerton Transportation Center (July 5 and 6, 2022)

Riders at the transit centers were provided with copies of the Making Better Connections Feedback Survey to complete. Additionally, customers requested the return of OC Bus routes 454 and 456. Some customers also provided feedback on safety at the stations.

Community Events and Organizations

To meet with the public in person and ensure participation across all communities, staff participated in several community destinations and events, including:

- OC Green Expo, Anaheim (June 11, 2022)
- CalFresh Enrollment and Resource Fair, Anaheim (June 11, 2022)
- CalOptima Resource Fair, La Habra (June 18, 2022)
- Juneteenth Festival, Santa Ana (June 18, 2022)
- Concert in the Park, Garden Grove (June 23, 2022)
- Ethnic Supermarkets, Fullerton, and Santa Ana (July 7-12, 2022)

A summary of public comments received from the community events is listed below. While customers supported increased route frequency, some voiced concern about proposed eliminations in the City of La Habra north of the Fullerton Transportation Center. Some attendees noted that they depend on the bus as their only form of transportation.

Comments heard included:

- Requests for more frequent service and more bus stop locations, particularly if that reduces the walking distance to a stop
- Opposition to the proposed lack of service north of the Fullerton Transportation Center from the cities of Fullerton and Buena Park area riders
- Opposition to the discontinuation of the Express and Bravo! routes within central Orange County

OCTA Advisory Committees

The Making Better Connections Draft Service Plan was presented to OCTA's advisory committees. Committee members received a presentation of the proposed draft plan and

were encouraged to provide their feedback and share the information with their respective organizations and constituencies.

Citizen Advisory Committee Meeting
July 19, 2022 – OCTA Headquarters

The Citizen Advisory Committee received a presentation on the Draft Service Plan and outreach efforts to date. Discussion of the item amongst the committee included:

- Discussion of the proposed timed transfer hub proposed at Laguna Hills
- Discussion of how routes were proposed for elimination and if those decisions were based on costs per mile including revenues or ridership subsidy amounts
- Suggestions to increase service on underperforming routes to induce ridership demand
- Discussion amongst the committee on how feedback and the results of the draft Plan will be integrated into the long-term transportation vision of Orange County, such as potential future freeway express routes

Diverse Community Leaders Quarterly Meeting
July 20, 2022 – Virtual Meeting Via Microsoft Teams

In addition to reaching out to diverse communities using multicultural communications via print or digital media translated into Spanish and Vietnamese, the Making Better Connections Draft Service Plan was presented at the Diversity Community Leaders Quarterly Meeting on July 20, 2022. While there was no route-specific feedback, the participated diversity community leaders agreed to distribute the information to their communities.

Accessible Transit Advisory Committee Meeting
July 26, 2022 – OCTA Headquarters

At the July 26, 2022, Accessible Transit Advisory Committee (ATAC) meeting, staff presented the Making Better Connections Draft Service Plan. Staff also shared with the committee what feedback OCTA had already received and heard from the public as of June 20, 2022.

Discussion from the committee included:

- Concern over the possible impact to OC ACCESS based on the proposed elimination or realignment of some OC Bus routes
- Discussion about the factors was considered for the proposed elimination of routes
- Discussion about “walking distance” to an alternative route, and how this may differ for elderly riders

- Concern over discontinuing bus routes within south Orange County, specifically service to the Saddleback community and senior center (Route 86)
- Discussion of outreach efforts to members of the blind community and the accessibility of the Draft Service Plan informational materials and survey to this community

Public Hearing

July 25, 2022 – OCTA Headquarters

As part of the OCTA Board meeting on July 25, 2022, a public hearing on the Draft Service Plan was held for public comment on the proposed plan. A total of eleven comments were received on the proposed changes at the public hearing. The transcript of the public hearing is attached as Appendix G.

Public comments included:

- Opposition to proposed changes to Route 53, based on impacts to Irvine and Woodbridge high schools and businesses along Barranca Parkway. Requests to extend Route 53 between East Yale Loop and West Yale Loop.
- Opposition to proposed changes to Route 86 due to the loss of a connection to Lake Forest and Mission Viejo.
- Opposition to the proposed change to Route 167 based on the new proposed segment
- Opposition to the proposed elimination of Route 76, based on its connections to John Wayne Airport, as well as schools and businesses along MacArthur Blvd
- Support for the proposed changes to routes 72 and 76

Conclusion

On May 23, 2022, the Orange County Transportation Authority embarked on an extensive public involvement program to gather feedback on the Making Better Connections Study Draft Service Plan.

The multifaceted and multilingual outreach program concluded with a public hearing on July 25, 2022. More than 8,500 customer comments and in-person engagements provided valuable feedback on the Plan. All public and customer feedback gathered was shared with transit planning staff to address within the final Making Better Connections Study Service Plan.

If approved by the Orange County Transportation Authority Board of Directors in October 2022, the final changes proposed as part of the Plan will begin to be implemented as early as February 2023 as part of OC Bus service changes.

Appendices

A. Making Better Connections Feedback Survey (English/Spanish/Vietnamese)

SURVEY



Your feedback is very important. Please provide your comments below or online at OCbus.com/ConnectionsSurvey
 Su opinión es muy importante. Escriba sus comentarios a continuación. OCbus.com/ConnectionsSurvey
 Câu trả lời của quý vị rất quan trọng. Xin cho biết ý kiến bên dưới. OCbus.com/ConnectionsSurvey

1. Please review the proposed service changes for the route(s) you wish to comment on and let us know what you think.
 Revise los cambios de servicio propuestos para la (las) ruta(s) sobre la (las) que desea comentar y háganos saber su opinión.
 Duyệt lại các thay đổi dịch vụ đề nghị cho (các) tuyến xe quý vị muốn cho ý kiến rồi điền vào cho chúng tôi biết.

Please write in the route you wish to comment on. Escriba la ruta que desea comentar. Viết tuyến xe mà quý vị muốn cho ý kiến.	Do you support the proposed changes of your route(s)? ¿Apoya los cambios propuestos en su(s) ruta(s)? Quý vị có ủng hộ những thay đổi đề nghị cho (những) tuyến xe này hay không?	Please comment below why you support or do not support the proposed changes of your route(s). Comente a continuación por qué apoya o no los cambios propuestos en su(s) ruta(s). Xin cho biết ý kiến bên dưới tại sao quý vị ủng hộ hoặc không ủng hộ các thay đổi đề nghị cho (những) tuyến xe này.
Route / Ruta / Tuyến #	<input type="checkbox"/> Yes / Sí / Có <input type="checkbox"/> No / No / Không <input type="checkbox"/> No opinion / Sin opinión / Không ý kiến	
Route / Ruta / Tuyến #	<input type="checkbox"/> Yes / Sí / Có <input type="checkbox"/> No / No / Không <input type="checkbox"/> No opinion / Sin opinión / Không ý kiến	
Route / Ruta / Tuyến #	<input type="checkbox"/> Yes / Sí / Có <input type="checkbox"/> No / No / Không <input type="checkbox"/> No opinion / Sin opinión / Không ý kiến	
Route / Ruta / Tuyến #	<input type="checkbox"/> Yes / Sí / Có <input type="checkbox"/> No / No / Không <input type="checkbox"/> No opinion / Sin opinión / Không ý kiến	

2. How often do you currently ride OC Bus? (Choose one)
 ¿Con qué frecuencia viaja actualmente en OC Bus? (Elija una opción) / Quý vị đi xe buýt OC thường xuyên ra sao? (Chọn một câu trả lời)
- 4-7 days per week / Entre 4 y 7 días a la semana / 4-7 ngày trong tuần
 - 1-3 days per week / Entre 1 y 3 días a la semana / 1-3 ngày mỗi tuần
 - 1-3 times per month / Entre 1 y 3 veces al mes / 1-3 lần một tháng
 - Less than once per month / Menos de una vez al mes / Ít hơn mỗi tháng một lần
 - None, but I have previously used OC Bus / Ninguna de las anteriores, pero he utilizado anteriormente OC Bus / Không, nhưng trước đây tôi đã đi xe buýt OC
 - None, I have never used OC Bus / Ninguna de las anteriores, nunca he utilizado OC Bus / Không, tôi chưa bao giờ đi xe buýt OC
3. If this plan were implemented, how would it affect your use of OCTA bus services? (Choose one)
 Si se implementara este plan, ¿cómo afectaría a su uso de los servicios de autobuses de OCTA? (Elija una opción)
 Nếu chương trình này được thực hiện, nó sẽ ảnh hưởng ra sao đến việc quý vị sử dụng dịch vụ xe buýt OCTA? (Chọn một câu trả lời)
- I would ride more often / Viajaría con más frecuencia / Tôi sẽ đi nhiều hơn
 - I would ride the same amount / Viajaría con la misma frecuencia / Tôi vẫn đi như cũ
 - I would ride less often / Viajaría con menos frecuencia / Tôi sẽ đi ít hơn
 - I wouldn't ride OCTA bus services / No utilizaría los servicios de autobuses de OCTA / Tôi sẽ không đi xe buýt của OCTA nữa
4. What is your email address or phone number? (This information will only be used to contact you in case you win a prize)
 ¿Cuál es su dirección de correo electrónico o número de teléfono? (Esta información solo se utilizará para comunicarnos con usted en caso de que gane un premio)
 Địa chỉ điện thư hoặc số điện thoại của quý vị là gì? (Thông tin này chỉ được dùng để liên lạc với quý vị nếu quý vị trúng thưởng)
-

B. Connections Draft Service Plan Booklet

A PDF of the Draft Service Plan booklet is available at:
www.OCTA.net/ConnectionsDraftPlan

C. Connections Survey Questionnaire Results

A summary of responses to individual survey questions is available at:
www.OCTA.net/ConnectionsSurveyResults

Connections Survey Open-Ended Comments

D. Customer Comments Feedback for Route Changes

The verbatim customer comments received for route-specific changes, along with the overall Draft Service plan, are available here:
www.OCTA.net/ConnectionsRouteComments

E. Other Customer Feedback

The verbatim customer comments received for any other "comments/concerns/questions" by respondents are available here:
www.OCTA.net/ConnectionsOtherComments

In-Person/Virtual Community Meetings

F. Customer Comments from Community Meetings

A summary of public comments received from the community meetings is available here:
www.OCTA.net/ConnectionsCommunityMeetingsSummary

Public / Customer Comments

G. Public Hearing Comments (July 25, 2022)

The transcript of the public hearing held during the OCTA Board meeting on July 25, 2022, is available here:
www.OCTA.net/ConnectionsPublicComments

H. Customer Comments Received (Email, Phone, Social Media)

All customer comments received from customer comments are available here:
www.OCTA.net/ConnectionsCustomerComments

Additional online discussion comments from the Making Better Connections Draft Plan on Reddit are available here:

www.OCTA.net/ConnectionsCustomerRedditComments

OCTA Advisory Committees

I. Citizen Advisory Committee Meeting (July 19, 2022)

Minutes from the July 19, 2022, Citizen Advisory Committee meeting are available here:

www.OCTA.net/ConnectionsCACMeetingMins

J. Diverse Community Leaders Meeting (July 20, 2022)

Minutes from the July 20, 2022, Diverse Community Leaders Group Meeting are available here:

www.OCTA.net/ConnectionsDCLMeetingMins

K. Accessible Transit Advisory Committee Meeting (July 26, 2022)

Minutes from the July 26, 2022, Accessible Transit Advisory Committee meeting are available here:

www.OCTA.net/ConnectionsATACMeetingMins

Final Service Plan: Proposed Route Recommendations

Route	Draft Plan Change (May 2022)	Overview of Comments	Final Recommendations (October 2022)	Annual Revenue Hours			Peak Vehicles			Improvement Categories					
				Existing	Proposed	Change	Existing	Proposed	Change	Improved Weekday Frequency	Expanded Service Hours	Improved Weekend Frequency	Route Alignment Changed	No Change	Discontinued Routes
1	<ul style="list-style-type: none"> Later service on weekends; More frequent service on weekday peak; Operate every 30 minutes (30s) southbound AM and northbound PM from Newport Transportation Center (NTC) to El Camino Real and Avenida Santa Margarita; operate 60 minutes (60i) all other times on entire route. 		<ul style="list-style-type: none"> No changes to draft plan. 	35,743	38,680	2,937	9	9	-	■	■				
25	<ul style="list-style-type: none"> Travel to Fullerton Park & Ride (FP&R) via Orangethorpe Avenue; Discontinue out-of-direction service on Artesia Boulevard and to the Buena Park Metrolink Station; Expand service hours all days; More frequent service all days. 	<ul style="list-style-type: none"> Very limited critical comments about lack of service to Buena Park. 	<ul style="list-style-type: none"> No changes to draft plan. 	21,220	29,580	8,360	4	7	3	■	■	■	■		
26	<ul style="list-style-type: none"> Travel via Placentia Avenue and Nutwood Avenue instead of Bradford Avenue and Chapman Avenue; Extend from FP&R to Buena Park Metrolink Station; Expand service hours on weekends. 	<ul style="list-style-type: none"> Significant number of critical comments asking for the route to remain on Bradford Avenue instead of serving Placentia Avenue. 	<ul style="list-style-type: none"> Restore to existing alignment (FP&R to Yorba Linda); No other changes to draft plan. 	24,885	26,555	1,670	5	5	-		■				
29	<ul style="list-style-type: none"> No service to Goldenwest Transportation Center (GWTC); Terminate route at Buena Park Metrolink Station; Less frequent service on weekday peak; Later service on weekends. 	<ul style="list-style-type: none"> Some critical comments about lack of service to GWTC; Limited number of critical comments about having to transfers to Route 129 to La Habra. 	<ul style="list-style-type: none"> Restore existing service to GWTC before 6 am and after 6 pm on weekdays and every other trip on weekends; No other changes to draft plan. 	61,431	53,362	(8,069)	13	8	(5)		■		■		
30	<ul style="list-style-type: none"> More frequent service on weekdays; Expand service hours all days; No alignment changes. 		<ul style="list-style-type: none"> No changes to draft plan. 	21,190	33,405	12,215	4	7	3	■	■				
33	<ul style="list-style-type: none"> More frequent service all days; Expand service hours all days; No alignment changes. 		<ul style="list-style-type: none"> No changes to draft plan. 	17,343	24,735	7,392	2	6	4	■	■	■			
35	<ul style="list-style-type: none"> Travel to FP&R via Orangethorpe Avenue; Discontinuing out-of-direction service on Commonwealth Avenue; More frequent service all days; Expand service hours all days. 	<ul style="list-style-type: none"> Limited number of critical comments about streamlined operations off Commonwealth Avenue. 	<ul style="list-style-type: none"> No changes to draft plan. 	28,962	36,456	7,494	4	8	4	■	■	■	■		
37	<ul style="list-style-type: none"> Terminate route at Fullerton Transportation Center (FTC) via Commonwealth Avenue and segment from Lamber Road to Whittier Boulevard will be covered by Route 143; Delete segment from Euclid Avenue and Commonwealth Avenue to La Habra; Delete service on Ellis Avenue; Expand service hours on weekends. 	<ul style="list-style-type: none"> Critical comments about discontinued service to La Habra. 	<ul style="list-style-type: none"> Restore existing alignment to La Habra north of Euclid Street and Commonwealth Avenue; No other changes to draft plan. 	35,147	35,894	747	7	7	-		■		■		
38	<ul style="list-style-type: none"> Extend route to Los Cerritos Center; New eastern terminus at Fairmont Boulevard and La Palma Avenue; Terminate route at La Palma Avenue and Fairmont Boulevard; Discontinue segment to Anaheim Hills Festival; Less frequent service on weekends; Later service all days. 	<ul style="list-style-type: none"> Limited number of critical comments about discontinued service. 	<ul style="list-style-type: none"> No changes to draft plan; restoration of service would be costly for limited benefit. 	40,156	38,250	(1,906)	11	10	(1)		■		■		
42	<ul style="list-style-type: none"> Terminate route at Carson Street and Norwalk Boulevard in Hawaiian Gardens; More frequent service on weekdays; Discontinue segment to Seal Beach; Later service all days. 	<ul style="list-style-type: none"> Significant number of critical comments about discontinuation of service to Seal Beach; many seem to think segment is entirely discontinued, instead of being covered by Route 46 	<ul style="list-style-type: none"> Extend route to Los Alamitos Boulevard and Ball Road to offer direct connection between routes 42 and 46; No other changes to draft plan. 	47,585	60,075	12,490	11	14	3	■	■	■	■		
43	<ul style="list-style-type: none"> Terminate route at FTC; Discontinue segment north of FTC; More frequent service on weekday; Less frequent service on weekends. 	<ul style="list-style-type: none"> Small number of critical comments about discontinuation of service to courthouse. Route 143 provides service to courthouse. 	<ul style="list-style-type: none"> No changes to draft plan. 	64,964	66,277	1,313	11	11	-	■			■		
46	<ul style="list-style-type: none"> Extend route to Seal Beach via Norwalk Boulevard/Los Alamitos Boulevard (formerly Route 42); Operate every 30 minutes (30s) from the Village at Orange to Norwalk Boulevard and Los Alamitos Boulevard and 60 (60i) minutes from Norwalk Boulevard and Los Alamitos Boulevard to Seal Beach Boulevard; Less frequent service on weekends; Expand service hours on weekends. 	<ul style="list-style-type: none"> See Route 42. 	<ul style="list-style-type: none"> No changes to draft plan. 	23,029	35,460	12,431	5	7	2	■	■		■		

Final Service Plan: Proposed Route Recommendations

Route	Draft Plan Change (May 2022)	Overview of Comments	Final Recommendations (October 2022)	Annual Revenue Hours			Peak Vehicles			Improvement Categories					
				Existing	Proposed	Change	Existing	Proposed	Change	Improved Weekday Frequency	Expanded Service Hours	Improved Weekend Frequency	Route Alignment Changed	No Change	Discontinued Routes
47	<ul style="list-style-type: none"> Terminate route at Newport Boulevard and 23rd Street; Discontinue service on Victoria Street; All trips travel on Wilson Street; More frequent service on weekdays; Later service all days. 	<ul style="list-style-type: none"> Critical comments about discontinued service to Balboa Pier; restoration of service would be costly for limited benefit. 	<ul style="list-style-type: none"> No changes to draft plan. 	69,984	81,875	11,891	17	17	-	■	■		■		
50	<ul style="list-style-type: none"> More frequent service all days. 		<ul style="list-style-type: none"> No changes to draft plan. 	54,208	70,266	16,058	12	15	3	■		■			
53	<ul style="list-style-type: none"> Terminate route at South Coast Plaza area; Discontinue segment from Main Street and MacArthur Boulevard to Irvine; Terminate express trips (53X service) permanently; More frequent service on weekdays; Later service on weekends. 	<ul style="list-style-type: none"> Significant number of critical comments about discontinuation of service to Irvine. 	<ul style="list-style-type: none"> Restore Route 53 to its existing alignment; Operate every 22 minutes (22s) from ARTIC to Main Street and MacArthur Boulevard, 44 minutes (44l) from Main Street and MacArthur Boulevard to Yale Loop and Alton Parkway; additional service on Main Street provided by Route 553; Extend Route 553 to service to South Coast. 	63,357	46,724	(16,633)	14	8	(6)		■				
54	<ul style="list-style-type: none"> Expand service hours all days. 		<ul style="list-style-type: none"> No changes to draft plan. 	41,022	39,056	(1,966)	10	9	(1)		■				
55	<ul style="list-style-type: none"> Expand service hours on weekends. 		<ul style="list-style-type: none"> No changes to draft plan. 	51,247	48,500	(2,747)	12	10	(2)		■				
56	<ul style="list-style-type: none"> More frequent service on weekday peak; Expand service hours all days. 		<ul style="list-style-type: none"> No changes to draft plan. 	21,548	26,300	4,752	5	5	-	■	■				
57	<ul style="list-style-type: none"> More frequent service all days; Timed transfers at Brea Mall; Operate every 10 minutes (10s) during peak and 15 minutes (15l) during midday from South Coast Plaza to California State University (CSU) Fullerton, 20 minutes (20l) during peak and 30 minutes (30l) during midday from CSU Fullerton to Brea Mall and 20 minutes (20l) during peak and 30 minutes (30l) during midday from South Coast Plaza to NTC; Terminate express trips (57X service) permanently. 		<ul style="list-style-type: none"> No changes to draft plan. 	83,112	97,099	13,987	16	23	7	■		■			
59	<ul style="list-style-type: none"> Extend Route to Brea Mall; More frequent service on weekdays; Less frequent service on weekends; Expand service hours on weekends; Timed transfers at Brea Mall. 	<ul style="list-style-type: none"> Very limited critical comments. 	<ul style="list-style-type: none"> No changes to draft plan. 	27,624	40,120	12,496	7	8	1	■	■		■		
60	<ul style="list-style-type: none"> All trips will operate between Larwin Square and CSU Long Beach; Less frequent service on weekends; More frequent service on weekdays. 	<ul style="list-style-type: none"> Very limited critical comments. 	<ul style="list-style-type: none"> No changes to draft plan. 	55,528	65,730	10,202	10	12	2	■			■		
64	<ul style="list-style-type: none"> Later service all days; Terminate express trips (64X service) permanently. 		<ul style="list-style-type: none"> No changes to draft plan. 	56,096	60,459	4,363	11	14	3		■	■			
66	<ul style="list-style-type: none"> Terminate route at Larwin Square; Discontinue segment from Walnut Avenue and Newport Boulevard to Irvine Valley College; More frequent service weekday midday and on weekends; Later service all days. 	<ul style="list-style-type: none"> Critical comments about removal of service to Irvine, especially Irvine Valley College. 	<ul style="list-style-type: none"> Restore existing Route 66 alignment and operations; Operate every 12 minutes (12s) during peak and 15 minutes (15l) during midday from GWTC to MacFadden Avenue and Newport Boulevard; 24 minutes (24l) during peak and 30 minutes (30l) during midday to Larwin Square and Irvine Valley College; No other changes to draft plan. 	55,172	65,965	10,793	15	15	-	■	■	■			
70	<ul style="list-style-type: none"> More frequent service on weekdays; Later service all days; Less frequent service weekends; Operate every 20 minutes (20s) from Edinger Avenue and Harbor Boulevard to Tustin Metrolink Station and 40 minutes (40l) from Edinger Avenue and Harbor Boulevard to Pacific Coast Highway and Warner. 		<ul style="list-style-type: none"> No changes to draft plan. 	39,358	35,640	(3,718)	7	8	1	■	■				
71	<ul style="list-style-type: none"> Extend route to California State Fullerton; Discontinue segment from Rose Drive and Orangethorpe Avenue to Rose Drive & Yorba Linda Boulevard; More frequent service on weekdays; Later service on weekends. 	<ul style="list-style-type: none"> Limited number of critical comments about discontinuation of service to Yorba Linda Boulevard. 	<ul style="list-style-type: none"> No changes to draft plan. 	27,290	44,464	17,174	5	9	4	■	■		■		
72	<ul style="list-style-type: none"> Extend route to Tustin Metrolink Station; More frequent service on weekdays; Expand service hours all days. 	<ul style="list-style-type: none"> No comments. 	<ul style="list-style-type: none"> No changes to draft plan. 	24,491	24,480	(11)	5	6	1	■	■		■		
76	<ul style="list-style-type: none"> Proposed for discontinuation; Route 178 will be rerouted along MacArthur Boulevard to provide closer service to John Wayne Airport. 	<ul style="list-style-type: none"> Significant number of critical comments, especially about lack of service to the airport. 	<ul style="list-style-type: none"> Restore existing alignment and service levels. 	6,549	6,630	81	2	2	-					■	

Final Service Plan: Proposed Route Recommendations

Route	Draft Plan Change (May 2022)	Overview of Comments	Final Recommendations (October 2022)	Annual Revenue Hours			Peak Vehicles			Improvement Categories					
				Existing	Proposed	Change	Existing	Proposed	Change	Improved Weekday Frequency	Expanded Service Hours	Improved Weekend Frequency	Route Alignment Changed	No Change	Discontinued Routes
79	<ul style="list-style-type: none"> All trips will use current alternate routing Ford Road and San Miguel Drive to NTC; Discontinue segment on Jamboree Road and Ford Road to NTC; More frequent service on weekdays; Expand service hours all days. 	<ul style="list-style-type: none"> Limited number of critical comments about choosing San Miguel Drive over Jamboree Road. 	<ul style="list-style-type: none"> No changes to draft plan. 	24,377	27,285	2,908	6	7	1	■	■		■		
82	<ul style="list-style-type: none"> Proposed for discontinuation; Segment from Portola Plaza to Rancho Santa Margarita will be served by an extension of Route 89. 	<ul style="list-style-type: none"> Some critical comments about discontinuation. 	<ul style="list-style-type: none"> No changes to draft plan; Route 177 extended to Portola Plaza to cover discontinued segment. 	3,897	-	(3,897)	2	-	(2)						■
83	<ul style="list-style-type: none"> Extend route to FP&R via interstate 5; Later service all days; Provide timed connections at Laguna Hills Transportation Center (LHTC). 	<ul style="list-style-type: none"> Limited critical comments about lack of access to Disneyland employee entrance; 	<ul style="list-style-type: none"> Realign to serve stops on Ball Road by Disneyland employee entrance; No other changes to draft plan. 	33,475	37,676	4,201	11	7	(4)		■		■		
85	<ul style="list-style-type: none"> No change. 		<ul style="list-style-type: none"> No changes to draft plan. 	7,956	8,160	204	2	4	2						■
86	<ul style="list-style-type: none"> Terminate route at Irvine Metrolink Station; Discontinue segment from Irvine Metrolink Station to Mission Viejo; More frequent service all days; New weekend service. 	<ul style="list-style-type: none"> Significant number of critical comments about discontinuation of service east of Irvine Station. 	<ul style="list-style-type: none"> Restore existing alignment and service levels. 	11,271	15,300	4,029	3	4	1						■
87	<ul style="list-style-type: none"> Discontinue segment from LHTC to Rancho Santa Margarita; Route to operate from LHTC to Crown Valley Parkway and Niguel Road; Provide timed connections at LHTC. 	<ul style="list-style-type: none"> Some critical comments about discontinuation of service on Alicia Parkway. 	<ul style="list-style-type: none"> No changes to draft plan. 	7,038	4,080	(2,958)	2	2	-	■	■		■		
89	<ul style="list-style-type: none"> Extend to Santa Margarita Parkway and Plano Trabuco Road; More frequency service all days; Expand service hours on weekends; Provide timed connections at LHTC. 	<ul style="list-style-type: none"> See Route 82. 	<ul style="list-style-type: none"> No changes to draft plan. 	16,911	21,600	4,689	5	7	2	■		■	■		
90	<ul style="list-style-type: none"> Reroute to serve LHTC; More frequent service all days; Expand service hours all days; Less frequent service on midday; Provide timed connections at LHTC. 	<ul style="list-style-type: none"> Some critical comments about deviation to Laguna Hills Transportation Center but more comments supportive of the change. 	<ul style="list-style-type: none"> No changes to draft plan. 	19,454	23,970	4,516	4	7	3	■	■	■	■		
91	<ul style="list-style-type: none"> Less frequent service on weekends; Expand service hours all days; Provide timed connections at LHTC. 		<ul style="list-style-type: none"> No changes to draft plan. 	28,571	29,964	1,393	8	6	(2)		■				
123	<ul style="list-style-type: none"> Terminate at FP&R; Discontinue segment from Buena Park Metrolink Station to Anaheim Canyon Metrolink Station; More frequent service; Later service. 	<ul style="list-style-type: none"> Some critical comments that want service to Anaheim Canyon Station restored, especially connection to CSU Fullerton. 	<ul style="list-style-type: none"> Extend to CSU Fullerton; No other changes to draft plan. 	16,856	17,340	485	5	5	-	■	■		■		
129	<ul style="list-style-type: none"> Extend route to Buena Park Metrolink Station; Terminate route at Brea Mall; Discontinue segment from Brea Mall to Kraemer Boulevard and La Palma Avenue; Less frequent service all days; Expand service hours on weekends; Timed connections at Brea Mall. 	<ul style="list-style-type: none"> A number of critical comments about the discontinuation of service past Brea Mall; however, many didn't seem to realize 59 was extended. 	<ul style="list-style-type: none"> Improved frequency from 60 to 30-minute all-day service to provide increased service to La Habra; No other changes to draft plan. 	13,430	20,095	6,665	3	5	2	■	■		■		
143	<ul style="list-style-type: none"> Realign to operate on Lambert Road and Euclid Street in La Habra instead of Harbor Boulevard to cover discontinued portions of Route 37; More frequent service all days; Expand service hours on weekends; Timed connections at Brea Mall. 	<ul style="list-style-type: none"> Some critical comments about choosing Lambert Road instead of Whittier Boulevard. 	<ul style="list-style-type: none"> Restore existing alignment; No other changes to draft plan. 	15,839	19,050	3,211	3	3	-	■	■	■	■		
150	<ul style="list-style-type: none"> No change. 		<ul style="list-style-type: none"> No changes to draft plan. 	12,878	13,005	128	3	4	1						■
153	<ul style="list-style-type: none"> Proposed to be discontinued. Riders can use Route 50, 57, and 59 to connect to ARTIC from the Brea Mall. 	<ul style="list-style-type: none"> Some critical comments about discontinuation. 	<ul style="list-style-type: none"> No changes to draft plan. 	10,991	-	(10,991)	2	-	(2)						■
164	<ul style="list-style-type: none"> New weekday route from the Tustin Metrolink Station to the Irvine Spectrum serving Irvine Boulevard; Provides new connections from Woodbury, Northwood, Stonegate, Orange County Great Park, and Portola Springs developments. 	<ul style="list-style-type: none"> Lack of support 	<ul style="list-style-type: none"> New Route 164 will not be included in the plan; The restoration of Routes 64 and 167 in Irvine would provide partial coverage. 				-	-	-						
167	<ul style="list-style-type: none"> Realignment on Walnut Avenue instead of Irvine Boulevard replacing discontinued portion of existing Route 66; Discontinue segment from Jeffrey Road and Walnut Avenue to Jeffrey Road and Irvine Boulevard; Operate every 30 minutes (30s) from Larwin Square to UC Irvine and 60 minutes (60l) from Larwin Square to the Village at Orange; New weekend service south of Walnut Avenue; Later evening service. 	<ul style="list-style-type: none"> Some critical comments about choosing Walnut Avenue over Irvine Boulevard. 	<ul style="list-style-type: none"> Restore existing alignment and service levels. 	15,606	15,810	204	2	4	2						■

Final Service Plan: Proposed Route Recommendations

Route	Draft Plan Change (May 2022)	Overview of Comments	Final Recommendations (October 2022)	Annual Revenue Hours			Peak Vehicles			Improvement Categories					
				Existing	Proposed	Change	Existing	Proposed	Change	Improved Weekday Frequency	Expanded Service Hours	Improved Weekend Frequency	Route Alignment Changed	No Change	Discontinued Routes
177	<ul style="list-style-type: none"> Realignment on Jeronimo Road and Alicia Parkway providing connections to Target, Kaiser, Vocational Visions and other shopping centers; Provide time connections at LHTC; Discontinue service on Saturdays; Less frequent service. 	<ul style="list-style-type: none"> Some critical comments about lack of Saturday service. 	<ul style="list-style-type: none"> No realignment on Jeronimo Road and Alicia Parkway; Add extension to Portola Plaza to cover discontinued portion of Route 82; Extend to Alicia Parkway to cover a portion of the discontinued Route 87; Restore service on Saturdays; No other changes to draft plan. 	7,517	9,408	1,891	2	3	1						
178	<ul style="list-style-type: none"> Realignment on MacArthur Boulevard instead of Von Karman Avenue to serve John Wayne Airport; More frequent weekday service 	<ul style="list-style-type: none"> Some critical comments about shorter turnaround by UC Irvine - the existing turnaround is near student housing. 	<ul style="list-style-type: none"> Restore to existing alignment around University of California, Irvine and on Von Karman Avenue; Restoration of Route 76 will serve the airport; No other changes to draft plan. 	9,070	13,515	4,445	3	4	1						
206	<ul style="list-style-type: none"> Discontinue Route. 		<ul style="list-style-type: none"> No changes to draft plan. 				-	-	-						
213	<ul style="list-style-type: none"> Discontinue Route. 		<ul style="list-style-type: none"> No changes to draft plan. 				-	-	-						
453	<ul style="list-style-type: none"> No change. 		<ul style="list-style-type: none"> No changes to draft plan. 	1,849	1,530	(319)	3	3	-						
463	<ul style="list-style-type: none"> Proposed to be discontinued; Riders can use Route 862 at Santa Ana Regional Transportation Center and Route 53 on Main Street. 	<ul style="list-style-type: none"> Limited critical comments. 	<ul style="list-style-type: none"> No changes to draft plan. 	3,158	-	(3,158)	5	-	(5)						
472	<ul style="list-style-type: none"> No change. 		<ul style="list-style-type: none"> No changes to draft plan. 	1,755	1,785	30	3	3	-						
473	<ul style="list-style-type: none"> No change. 		<ul style="list-style-type: none"> No changes to draft plan. 	1,955	1,811	(145)	3	3	-						
480	<ul style="list-style-type: none"> No change. 		<ul style="list-style-type: none"> No changes to draft plan. 	1,568	1,530	(38)	2	2	-						
529	<ul style="list-style-type: none"> Reduce peak frequency. 		<ul style="list-style-type: none"> No changes to draft plan. 	14,378	12,750	(1,628)	5	5	-						
543	<ul style="list-style-type: none"> More frequent service on weekdays; Later service on weekdays; Discontinue weekend service; No alignment changes. 		<ul style="list-style-type: none"> No changes to draft plan. 	28,789	24,480	(4,309)	7	8	1						
553	<ul style="list-style-type: none"> New Bravo! service on Main Street scheduled for implementation October 2022. 		<ul style="list-style-type: none"> Extend to South Coast Plaza. No other changes to draft plan. 	-	17,340	17,340	-	6	6						
560	<ul style="list-style-type: none"> Operate between Santa Ana Regional Transportation Center and Westminster Avenue and Goldenwest Street; Service to CSU Long Beach will be provided all day by Route 60; Later service on weekdays; More frequent service on weekdays. 	<ul style="list-style-type: none"> Some critical comments about discontinuation of service to CSU Long Beach. 	<ul style="list-style-type: none"> No changes to draft plan; CSU Long Beach served by Route 60. 	25,283	18,870	(6,413)	8	8	-						
701	<ul style="list-style-type: none"> Discontinue Route. 		<ul style="list-style-type: none"> No changes to draft plan. 				-	-	-						
721	<ul style="list-style-type: none"> Discontinue Route. 		<ul style="list-style-type: none"> No changes to draft plan. 				-	-	-						
794	<ul style="list-style-type: none"> Discontinue Route. 		<ul style="list-style-type: none"> No changes to draft plan. 				-	-	-						
862	<ul style="list-style-type: none"> No change. 		<ul style="list-style-type: none"> No changes to draft plan. 	9,750	9,775	25	1	2	1						
Total Resources Impact				1,441,866	1,598,166	156,300	337	372	35						

Existing and Proposed Route Network (North County)

ATTACHMENT D



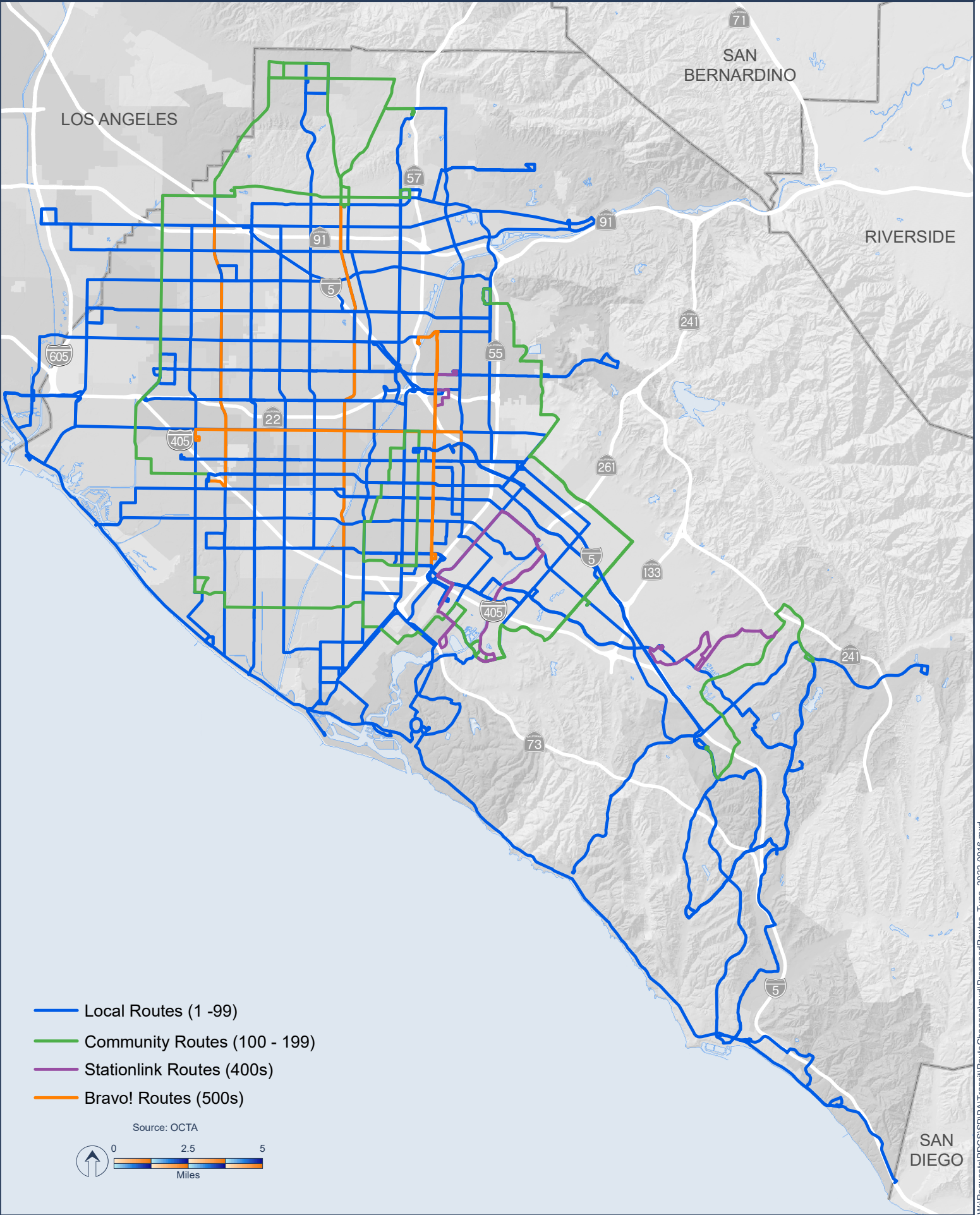
Existing and Proposed Route Network (South County)

ATTACHMENT E



Local (1-99), Community (100-199), Stationlink (400s), and Bravo! (500s) Routes

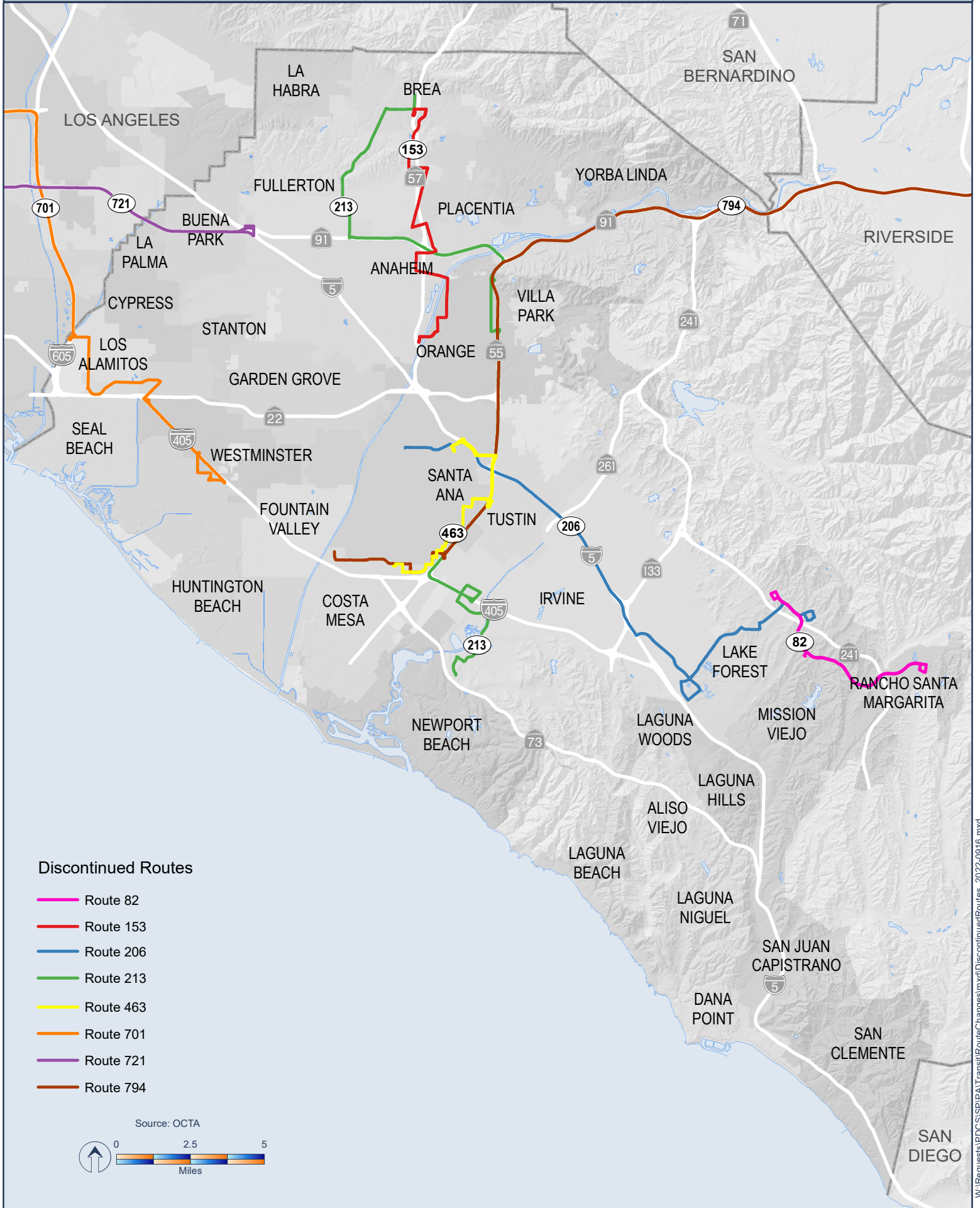
ATTACHMENT F



- Local Routes (1 -99)
- Community Routes (100 - 199)
- Stationlink Routes (400s)
- Bravo! Routes (500s)

Source: OCTA





Making Better Connections Study Final Service Plan



Background and Purpose

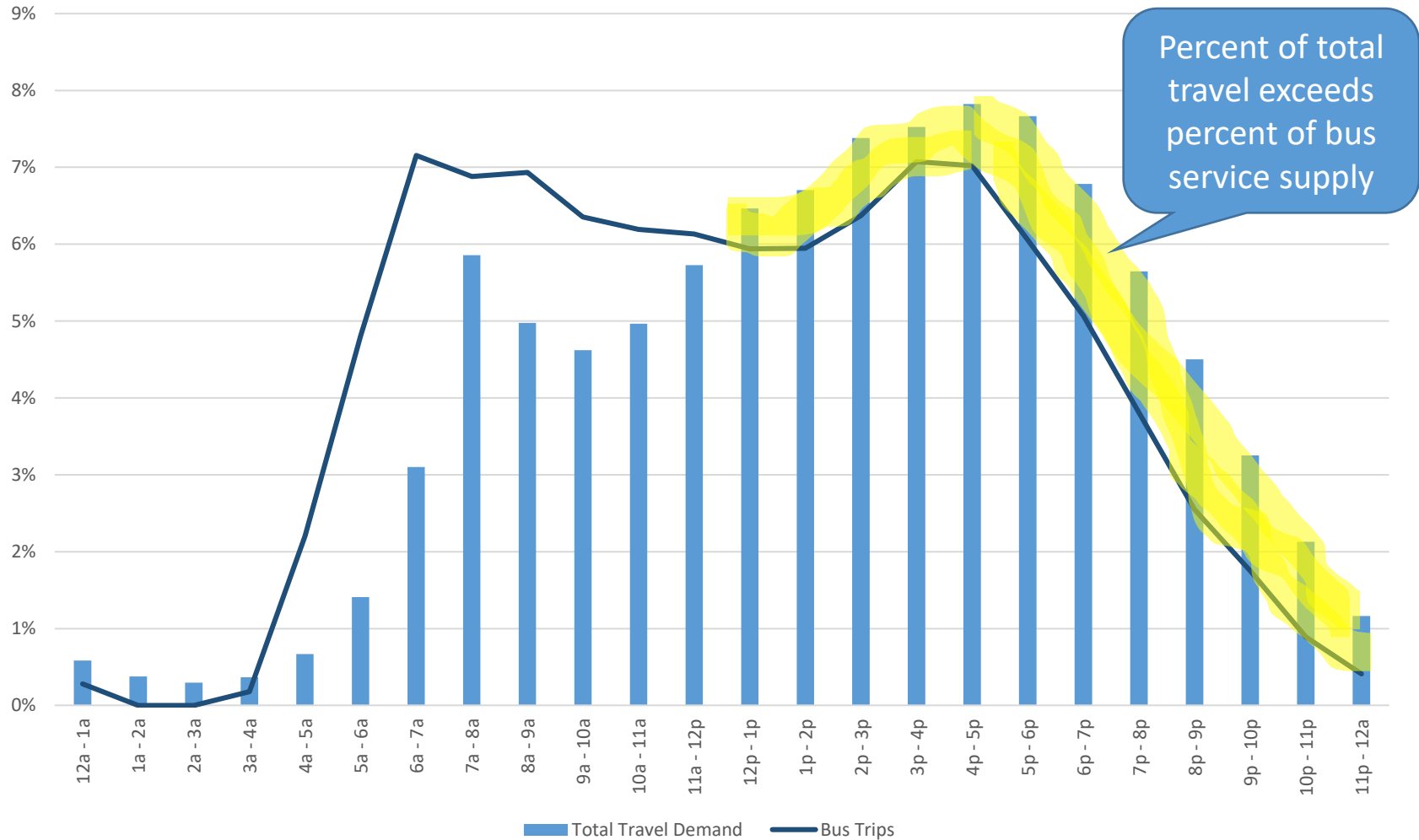
- Last bus restructuring study in 2012 and implemented as OC Bus 360°
- Declining ridership experienced over the last decade
- Ridership decline exacerbated by COVID-19
- Ascertain current transit demand trends
- Align transit system design with emerging, post pandemic, travel patterns
- Improve customer experience and grow ridership by:
 - Matching the service to markets
 - Improving service in the central urban core area
 - Leveraging innovation and technology to reduce customer wait and travel times

Total Travel Demand vs. Bus Trips Provided Hour (2021)

Some transit service delivery is not well-aligned with regional travel behavior by time of day.

Opportunities exist to increase all-day service levels to capture more demand.

Sources: Anonymized regional cell phone data and OCTA scheduled bus service; Cambridge Systematics, Inc., 2021

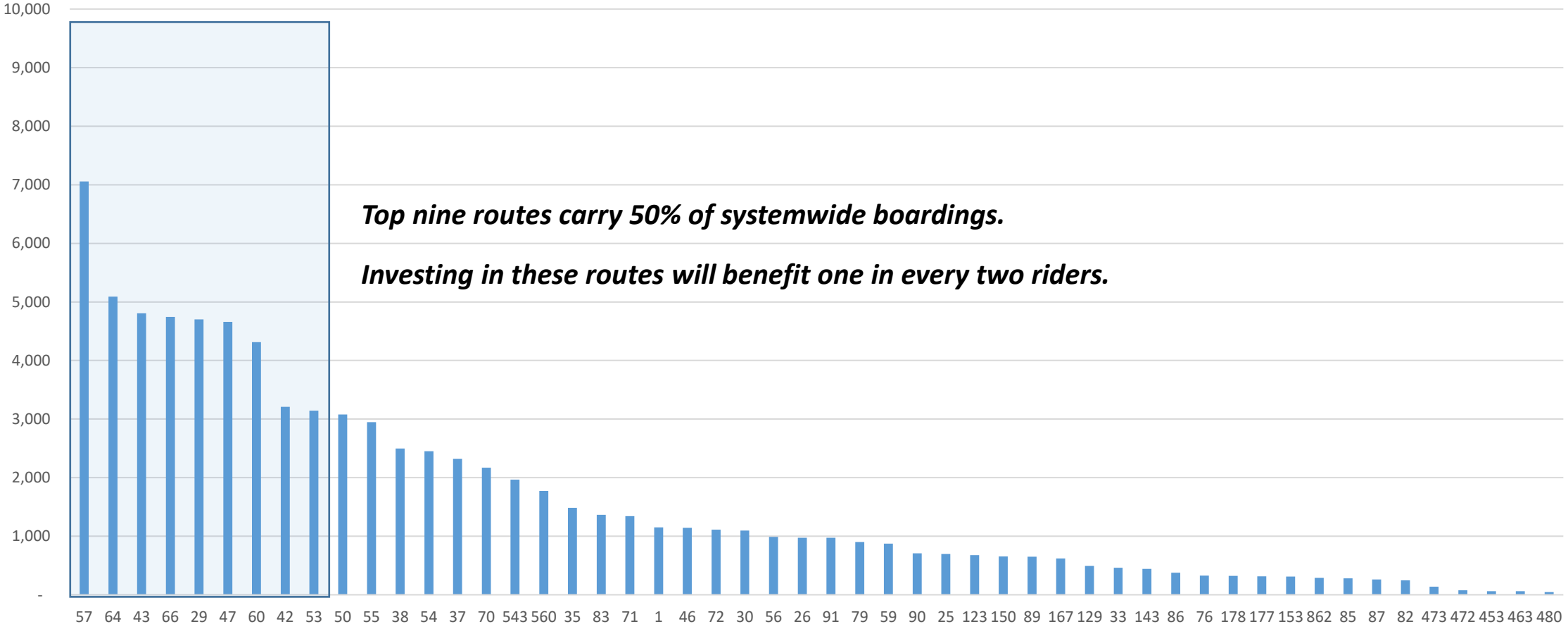


OCTA – Orange County Transportation Authority

Demand and Productivity

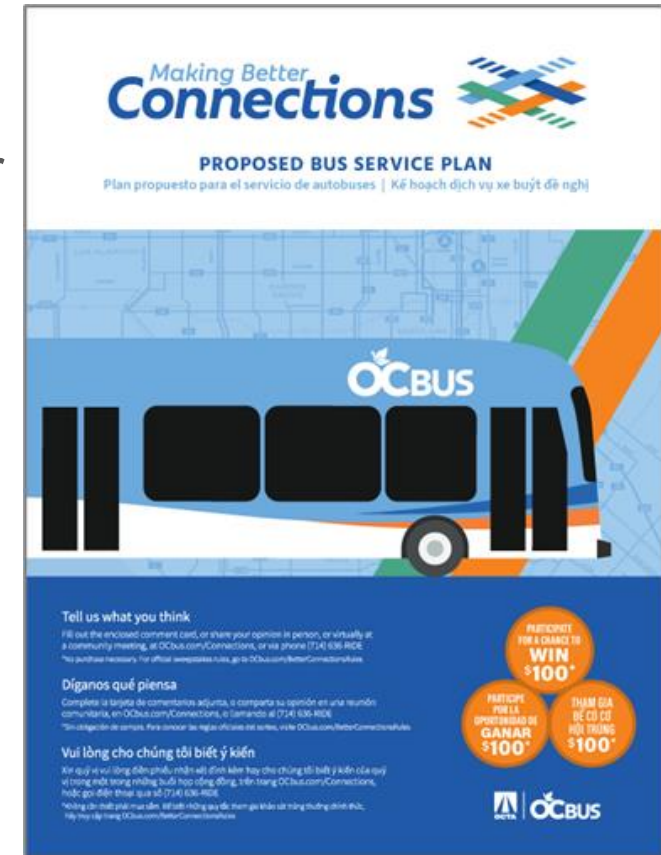


2021 Weekday Ridership by Route



Phase 2 Outreach Activities Summary

- 60,000 print booklets including survey in multiple languages – onboard buses and at outreach events (also available online)
- Digital communications – web portal and comparative trip planner
- Bus ride-alongs, ads, and interior cards
- Press releases/advertisements
- Local jurisdiction and public committee communications and meetings
- School (elementary, high school, and college) and employer communications
- Three in-person/virtual community meetings



What We've Heard

57 percent support proposed changes, noting:

- Increased service frequency
- Increased weekday service hours
- Increased weekend service hours

23 percent disagreed with the draft plan, noting:

- Route modifications, including removed segments
- Discontinuation of routes or limited stop service

20 percent of responses were neutral with the proposed OC Bus service plan on individual routes

CHANNEL	COUNT
Online/Print Surveys	4,885
Onboard Ride-Along Engagements (estimated)	1,830
Community Event Engagements at OCTA Booths (estimated)	1,235
Transit Center Pop-Up Event Attendees (estimated)	318
Customer Relations (Calls, Emails, and Social Media)	185
In-person/Virtual Community Meeting Attendees	97
Public Hearing Comments	11
Total	8,561

Final Service Plan Modifications Summary

- OC Bus system consist of 58 routes
- Improve frequencies, expand service hours, modify route alignments, and discontinue unproductive routes
- Top ten corridors operate every 10-15 minutes frequency from 6:00 AM to 6:00 PM, benefiting over 58% of all riders
- 35 routes operate on a frequency of 30 minutes or better
- All routes operate on a maximum of 60 minutes, every day of the week

Final Service Plan Modifications Summary (cont.)

- Timed transfer hubs at Brea Mall and Laguna Hills Transportation Center
- Limited stop Bravo! Route 553 on Main Street (implemented as part of the October 2022 service change)
- Five freeway Express Routes (206, 213, 701, 721, 794) proposed to be discontinued
- Two local Routes (82, 153) and one Stationlink Route (463) proposed to be discontinued

Draft vs. Final Service Plan

- 40 routes proposed to be modified as part of Draft Service Plan
- Public input resulted in further refinements for 17 routes
- Modifications include:
 - Route 26 – restored to its original alignment and service levels
 - Route 29 – restored service to Goldenwest Transportation Center when 529 is not running (before 6:00 am and after 6:00 pm on weekdays and every other trip on weekends)
 - Route 37 – restored service to La Habra Boulevard, north of Euclid Avenue and Commonwealth Avenue
 - Route 42 – extend route south to Ball Road to maintain transfer opportunities with service to Seal Beach Boulevard on Route 46

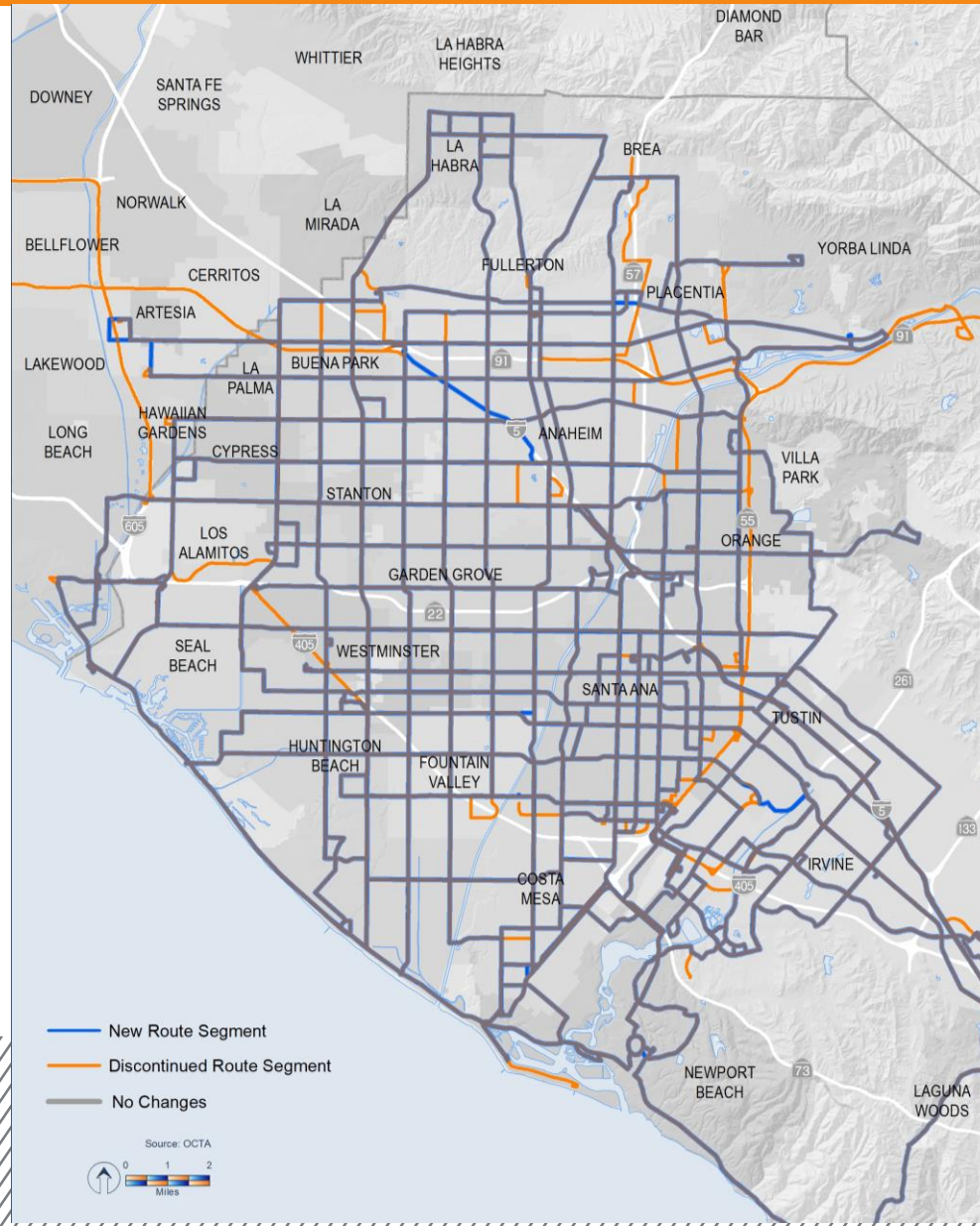
Changes from Draft Plan

- Route 53 – restore to its original alignment with a direct connection to Irvine
- Route 66 – restore to its original alignment with a direct connection to Irvine
- Route 76 – continue to operate route on existing alignment and service levels to maintain service to John Wayne Airport
- Route 83 – realign service on Ball Road to serve additional stop by Disneyland before resuming service on Interstate 5
- Route 86 – restore to its original alignment and service levels
- Route 123 – extend service to terminate at CSU-Fullerton, maintaining a direct connection between Fullerton College and CSU-Fullerton along East Chapman Avenue
- Route 129 – improve frequency from every 60 to every 30 minutes in order to provide more comparable service levels on segments previous served by Route 29

Changes from Draft Plan (continued)

- Route 143 – restore to its original alignment
- Route 164 – no longer recommended as a new route due to lack of support, and revised Route 167 would generally be duplicative
- Route 167 – restore to its original alignment and service levels
- Route 177 – extend to Portola Plaza to cover segment of discontinued Route 82
- Route 178 – restore to its original alignment
- Route 553 – extend southern terminus to South Coast Plaza for better network connections

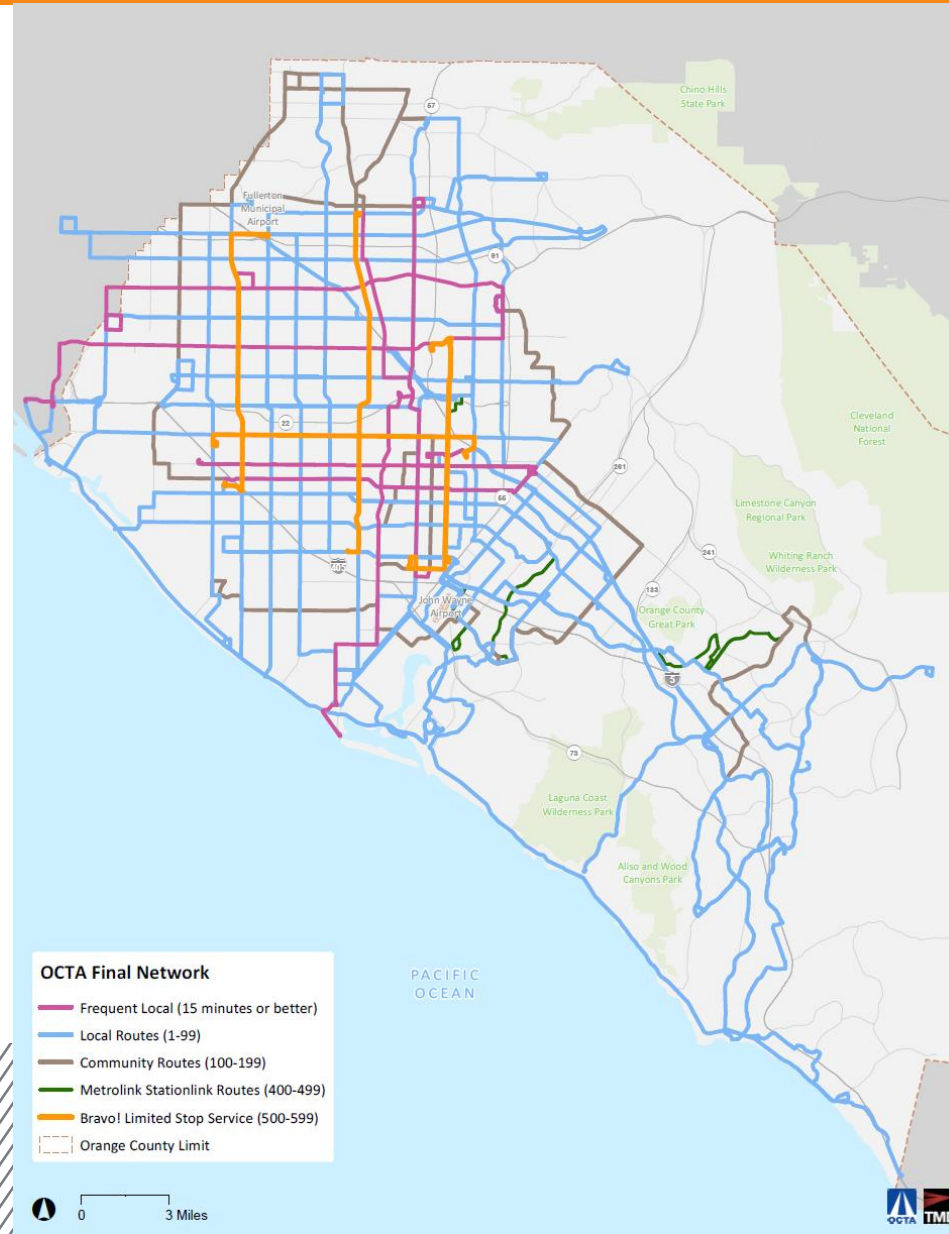
Final Service Plan (North)



Final Service Plan (South)



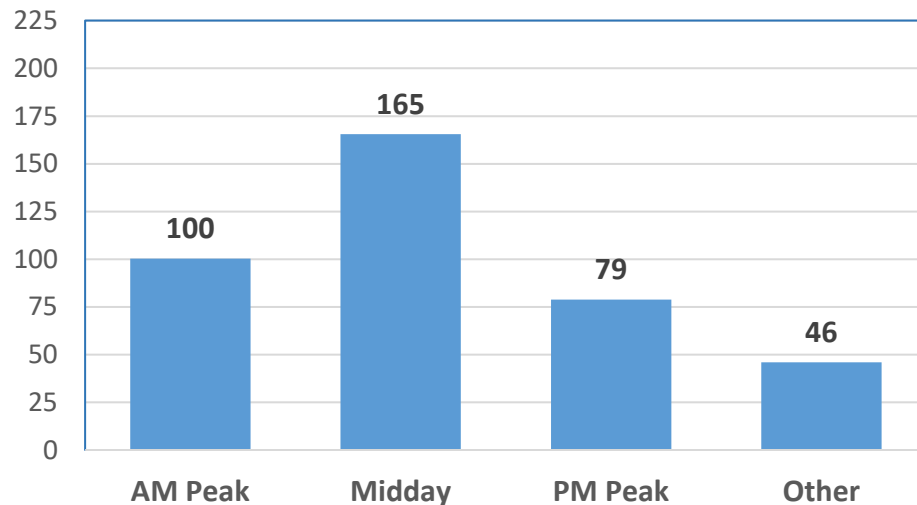
Final Bus Network



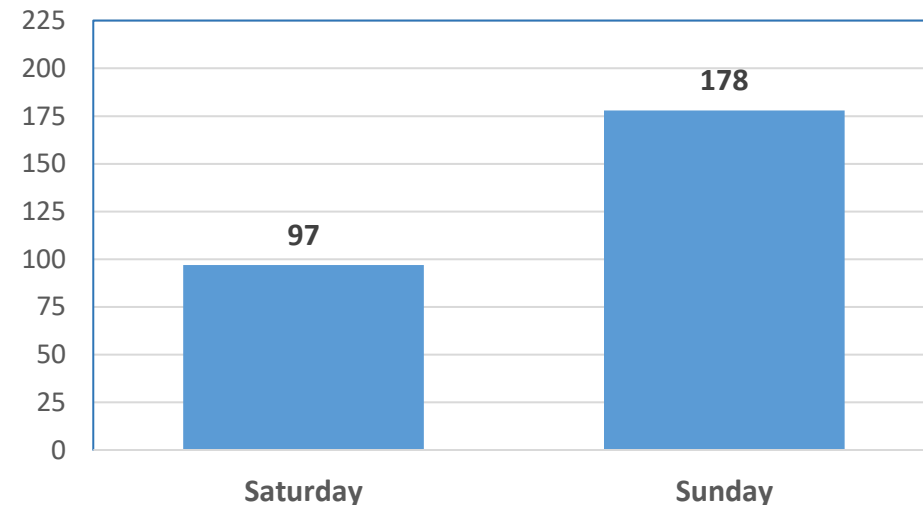
Benefits – Increased Bus Trips

- Adds over 114,000 annual bus trips
- Adds 390 weekday bus trips (+13%)
- Add 275 weekend bus trips (+5% on Saturday and +9% on Sunday)

Change in Number of Daily Bus Trips by Time of Day - Weekdays



Change in Number of Daily Bus Trips Weekends



Final Plan Outcomes

- 89% of OC Bus riders will experience:
 - More frequent service
 - Better connections
 - More hours of service
- 10% will experience no changes
- <1% located more than 1/2 mile from a bus stop

Title VI Equity Analysis

- An analysis of the potential impacts of the final plan on minority and low-income populations has found that there is no disparate impact or disproportionate burden, and no mitigation measures need to be considered.

Potential Access Services Impacts

- <0.05% impacts to OC Access trips.
- <15 trips impacted per day.
- Same day taxi would augment these trips.

Implementation Strategies

- Assess and determine availability of labor resources during each service change.
- Monitor ridership levels and passenger loads and focus service additions to ensure sufficient capacity on vehicles.
- Adjust service based on changes in demand.
- Balance service changes to accommodate seasonal differences in transit demand.
- Group changes to minimize gaps in geographic coverage.
- Group changes at timed transfer hubs ensuring connections to minimize passenger wait time.

Recommendations/Next Steps

- Approve final service plan
- Communicate final plan to the public
 - Bus interior cards
 - Transit Connection Newsletter - quarterly newsletter sent to active OC ACCESS riders and Adult Day Centers
 - Digital communications
 - OCTA advisory committee meetings
- Implement over a 24-month period, consistent with available resources

OCTA
Making Better Connections Title VI Equity Analysis

2022 Making Better Connections Study – Title VI Analysis

Overview

In compliance with Title VI of the Civil Rights Act of 1964, the Federal Transit Administration (FTA) requires all transit agencies that receive federal funding to monitor the performance of their systems, ensuring services are made available and/or distributed equitably. One component of ensuring compliance is performing an equity analysis for all fare changes and any major service changes to determine its impact on minority (race, color, or national origin) and low-income populations.

The Making Better Connections project is a major restructuring of the OC Bus network, making significant service changes system-wide. To ensure that there is no disparate impact or disproportionate burden caused by the service changes, OCTA has completed a Title VI analysis for the proposed service changes.

Methodology

To analyze the impact of service changes on low-income and minority populations, OCTA compares annual person trips before and after the proposed service change. For the Making Better Connections project, OCTA analyzed the entire existing system and the entire proposed system to ensure that resources are being distributed equitably across the county.

The analysis is completed in several steps:

1. The number of trips on each individual pattern for the existing and proposed network is identified.
2. Using GIS, each individual trip pattern is given a half-mile buffer, and the number of minority, non-minority, low-income, and non-low-income individuals living within that buffer is identified using block group ACS data. In most cases, the half-mile buffer does not line up with block groups. When this happens, population numbers are calculated by taking the percentage of the block group within the half-mile buffer and multiplying that percentage by the total population numbers for that block group.
3. The number of each population group (minority, non-minority, low-income, and non-low-income) within the half-mile buffer of a pattern is multiplied by the number of trips on that pattern to find the number of annual people-trips for each pattern.
4. The total number of minority, non-minority, low-income, and non-low-income is summed for both the existing and proposed networks. Then, the percentage of minority and non-minority annual person-trips under the existing and proposed network are compared to determine if the proposed changes cause a disparate impact. A similar comparison is done for low-income and non-low-income populations to determine if the proposed changes cause a disproportionate burden.

Findings and Conclusion

Table 1 details the findings of the Title VI analysis. The complete analysis can be found in the Appendix.

Table 1: Title VI Analysis Findings

	Existing	Proposed
Percent of Minority Annual Person-Trips	73.4%	73.5%
Percent of Non-Minority Annual Person-Trips	26.6%	26.5%
Percent of Low-Income Annual Person-Trips	24.9%	24.9%
Percent of Non-Low-Income Annual Person-Trips	75.1%	75.1%

The proposed changes have very little impact on the percentage of annual person-trips offered to minority and low-income populations, and what impact there is results in an increase in the percentage of annual person-trips offered to minority populations. As a result, the proposed Making Better Connections plan does not cause a disparate impact or disproportionate burden, and no mitigation measures need to be considered.

Appendix

Trips by Pattern

Route	Direction	Via	From	To	Weekday - baseline	Saturday - baseline	Sunday - baseline	Weekday - proposed	Saturday - proposed	Sunday - proposed
1	Inbound	i1	EICSaM	7Chanl	14	14	14	16	16	16
1	Inbound	i2	EICSaM	NPTC	1	1	1			
1	Outbound	o1	7Chanl	EICSaM	15	15	15	16	16	16
1	Outbound	o2	NPTC	EICSaM	6			6		
25	Inbound	i1	FPNR	PCH1st	15	12	12	30	33	17
25	Outbound	o1	PCH1st	FPNR	15	11	11	30	33	17
26	Inbound	i2	FTC	NuComE	1					
26	Inbound	i1	LeLakW	BPMS						
26	Inbound	i1	LeLakW	FPNR	26	15	15	35	22	22
26	Outbound	o1	BPMS	LeLakW						
26	Outbound	o1	FPNR	LeLakW	26	15	15	35	22	22
29	Inbound	i1	BchLaH	PC1stS	27	25	24			
29	Inbound	i2	PC1stS	BPMS	24	24	22	34	26	26
29	Outbound	o2	BPMS	PC1stS	24	24	22	34	26	26
29	Outbound	o1	PC1stS	BchLaH	28	25	24			
29	Inbound	i3	PC1stS	BPMS				6	23	23
29	Outbound	o3	BPMS	PC1stS				6	23	23
30	Inbound	i1	CerCtr	EsFaiW	20	14	14	34	17	17
30	Outbound	o1	EsFaiW	CerCtr	20	14	14	34	17	17
33	Inbound	i1	FPNR	MagPCH	12	9	9	29	21	20
33	Outbound	o1	MagPCH	FPNR	13	9	9	29	21	20
35	Inbound	i1	19MeyW	FPNR	24	19	16	31	20	20
35	Outbound	o1	FPNR	Ne18tS	23	19	17	31	20	20
37	Inbound	i1	1stMai	TalMtW	35	20	16	34	23	23
37	Inbound	i1	FTC	TalMtW						
37	Outbound	o1	MaHylW	1stMai	34	20	15	34	23	23
37	Outbound	o1	MaHylW	FTC						
38	Inbound	i1	CerCtr	EsFaiW				40	17	17
38	Inbound	i1	DAPIOW	AHFest	36	19	21			
38	Outbound	o1	AHFest	DAPIOW	36	17	19			
38	Outbound	o1	EsFaiW	CerCtr				40	17	17
42	Inbound	i1	CaNorE	VOrSZ5	14	11	11			
42	Inbound	i3	ElMaiW	VOrSZ5	18	13	13			
42	Inbound	i2	VOrSZ5	CaNorE	12	12	12			
42	Inbound	i4	VOrSZ5	CaNorE						

42	Inbound	i42a	VOrSZ5	CaNorE						
42	Inbound	i4	VOrSZ5	ElMaiW	6	4	4			
42	Outbound	o1	CaNorE	VOrSZ5		1	1			
42	Outbound	o2	CaNorE	VOrSZ5						
42	Outbound	o42a	CaNorE	VOrSZ5						
42	Outbound	o2	ElMaiW	VOrSZ5	6	5	5			
42	Outbound	o3	VOrSZ5	ElMaiW	19	14	14			
42	Inbound	i5	VOrSZ5	NoWarN				40	34	34
42	Inbound	i5a	VOrSZ5	NoWarN				20		
42	Outbound	o5	NoWarN	VOrSZ5				40	34	34
42	Outbound	o5a	NoWarN	VOrSZ5				20		
43	Inbound	i3	19NewW	BrWVVS	6	4	3			
43	Inbound	i3	19NewW	FTC				52	65	64
43	Inbound	i2	BrWVVS	Ne18tS	42	40	36			
43	Inbound	i1	HaMcAN	FTC	1					
43	Outbound	o2	BrWVVS	19NewW	16	12	12			
43	Outbound	o2	FTC	19NewW				52	65	64
43	Outbound	o1	HaBerN	BrWVVS	44	41	39			
46	Inbound	i2	ElMaiW	VOrSZ3				18	18	18
46	Inbound	i1	NoWarN	VOrSZ3	19	18	18			
46	Outbound	o2	VOrSZ3	ElMaiW				18	18	18
46	Outbound	o1	VOrSZ3	NoWarN	19	17	17			
46a	Inbound	i1	NoWarN	VOrSZ3				12		
46a	Outbound	o1	VOrSZ3	NoWarN				12		
47	Inbound	i2	FTC	Ba23rN	18	12	12			
47	Inbound	i5	FTC	Ba23rN	8	8	8	61	46	46
47	Inbound	i3	FTC	OcFPlm	6	6	6			
47	Inbound	i4	FTC	OcFPlm	14	11	11			
47	Inbound	i1	FaArIN	FaWesN	2					
47	Outbound	o2	Ba23rN	FTC	18	7	7			
47	Outbound	o4	Ba23rN	FTC	14	14	14	61	46	46
47	Outbound	o1	FaWesS	Ba23rN	1					
47	Outbound	o3	OcFPlm	FTC	18	17	17			
50	Inbound	i2	7Chanl	VOrSZ2	46	30	29			
50	Inbound	i1	VOrSZ2	7Chanl	47	29	29	62	36	36
50	Outbound	o1	7Chanl	VOrSZ2				62	36	36
53	Inbound	i1	MaMaPW	ARTIC	41	46	43	24	29	29
53	Inbound	i1	MaPIA	ARTIC						
53	Inbound	i2	YLAItW	ARTIC	38	22	17	28	37	36
53	Outbound	o2	ARTIC	MaMaPW	39	45	42	24	29	29

53	Outbound	o1	ARTIC	MaPIA						
53	Outbound	o1	ARTIC	YLAItW	41	21	17	28	37	36
54	Inbound	i3	ChHarE	OTC	4					
54	Inbound	i2	ChVaVE	RSChaN			27			
54	Inbound	i1	ChVaVE	SCClge	34	30		40	31	31
54	Outbound	o3	OTC	ChHarW	2					
54	Outbound	o2	RSChaN	ChVaVE			28			
54	Outbound	o1	SCClge	ChVaVE	35	30		40	31	31
55	Inbound	i3	FaArIN	Fl6thN		2				
55	Inbound	i1	Fl6thN	NPTC	39	33	31	36	32	32
55	Outbound	o1	NPTC	Fl6thN	37	32	29	36	32	32
56	Inbound	i2	BeVaVE	OTC	19	13	13			
56	Inbound	i1	OTC	BeVaVE	19	12	12	34	23	23
56	Outbound	o2	BeVaVE	OTC				34	23	23
56	Outbound	o2	ChVaVE	OTC	9	4	4			
56	Outbound	o1	OTC	ChVaVE	8	6	6			
57	Inbound	i1	AnSakW	SCOras	23	23	20			
57	Inbound	i2	NPTC	BrMalS				41	36	35
57	Inbound	i2	NPTC	BrMILZ	78	78	76			
57	Outbound	o1	BrMalS	NPTC				41	36	35
57	Outbound	o1	BrMILZ	NPTC	74	74	68			
57	Outbound	o4	StCVBu	AnSakW	22	22	18			
57	Outbound	o3	StCVBu	NPTC	2	2	5			
57a	Inbound	i1	AnSakW	NuComE				39	34	35
57a	Outbound	o1	NuComE	AnSakW				39	34	35
59	Inbound	i1	KrCorS	TRParE		17	15			
59	Inbound	i2	UnCenE	BrMalS				30	17	17
59	Inbound	i2	UnCenE	LPKraW	24					
59	Outbound	o2	BrMalS	UnCenE				30	17	17
59	Outbound	o2	KrCorS	UnCenE	22					
59	Outbound	o1	TRParE	LPKraW		17	13			
60	Inbound	i2	7Chanl	LarSqu	18	39	39	52	40	40
60	Inbound	i3	MaLocE	FrTusE		18	18			
60	Inbound	i1	MaLocE	LarSqu	32					
60	Inbound	i3	WeGoWE	SARTC					20	20
60	Outbound	o3	FrTusE	MaLocE		19	19			
60	Outbound	o1	LarSqu	7Chanl	36	80	80	52	40	40
60	Outbound	o2	LarSqu	MaLocE	31					
60	Outbound	o2	SARTC	WeGoWE					20	20
64	Inbound	i1	EdBolN	LarSqu	57	50	50	76	57	56

64	Inbound	i2	WestMI	LarSqu	7	3				
64	Outbound	o1	LarSqu	EdBoIN	67	55	53	76	57	56
66	Inbound	i2	GWTC	BrNewE	28	27	27	37	25	25
66	Inbound	i1	GWTC	IrvVCo	32	17	17	39	31	31
66	Outbound	o1	BrNewE	GWTC	29	25	25	37	25	25
66	Outbound	o2	IrvVCo	GWTC	28	18	18	39	31	31
70	Inbound	i1	TusSta	GWTC	21	17	15			
70	Inbound	i2	TusSta	WarPCH	22	18	14	27	26	26
70	Outbound	o1	GWTC	TusSta	20	17	13			
70	Outbound	o2	WarPCH	TusSta	21	16	15	27	26	26
70a	Inbound	i1	TusSta	EdHarW				18		
70a	Outbound	o1	HaEdiS	TusSta				18		
71	Inbound	i1	CoNutS	SuPlaN				31	21	21
71	Inbound	i1	RoYoLS	SuPlaN	22	20	17			
71	Outbound	o1	SuPlaN	CoNutS				31	21	21
71	Outbound	o1	SuPlaN	RoYoLS	21	20	16			
72	Inbound	i1	WarPCH	TusLeg	25	18	16			
72	Inbound	i1	WarPCH	TusSta				30	20	20
72	Outbound	o1	TusLeg	WarPCH	25	18	16			
72	Outbound	o1	TusSta	WarPCH				30	20	20
76	Inbound	i1	TaBeaW	DuMicE	13			13		
76	Outbound	o1	DuMicE	TaBeaW	13			13		
79	Inbound	i2	LarSqu	NPTC	9	7	7	27	17	17
79	Inbound	i1	NPTC	LarSqu	9	7	7			
79	Outbound	o1	LarSqu	NPTC	8	8	8			
79	Outbound	o2	NPTC	LarSqu	8	7	7	27	17	17
82	Inbound	i2	PTADPS	TCAItS	13					
82	Inbound	i1	TCAItS	PTADPS	14					
83	Inbound	i1	FPNR	LHTC				35	34	34
83	Inbound	i1	MaHarW	LHTC	68	58	52			
83	Outbound	o1	LHTC	FPNR				35	34	34
83	Outbound	o1	LHTC	MaHarW	35	32	27			
83	Outbound	o2	MaHarW	SASanE		1				
83	Outbound	o3	SASanE	LHTC		3				
83	Outbound	o4	SASanW	MaHarW		1	2			
85	Inbound	i1	NiCrVN	LAMuRN	15			16		
85	Outbound	o1	LAMuRN	NiCrVN	17			16		
86	Inbound	i1	MaPIA	IrvSta						
86	Inbound	i1	SuBriW	MurCtr	14			18		
86	Outbound	o1	IrvSta	MaPIA						

86	Outbound	o1	MurCtr	SuBriW	14				18	
87	Inbound	i1	NiCrVN	EmAveN	13					
87	Inbound	i1	NiCrVN	LHTC					16	
87	Outbound	o1	EmAveN	NiCrVN	13					
87	Outbound	o1	LHTC	NiCrVN					16	
89	Inbound	i1	LAMuRN	LBBS	23	14		13		
89	Inbound	i1	SMAnto	LBBS					22	16
89	Outbound	o1	LBBS	LAMuRN	22	14		14		
89	Outbound	o1	LBBS	SMAnto					22	16
90	Inbound	i1	TusSta	GLDPHN	20	12		10	24	17
90	Outbound	o1	GLDPHN	TusSta	20	11		11	24	17
91	Inbound	i1	LHTC	LMPicS	28	24		16	30	26
91	Outbound	o1	LMPicS	LHTC	28	23		16	30	26
123	Inbound	i1	ACynML	GWTC	15					
123	Inbound	i2	BPMS	GWTC	1					
123	Inbound	i2	FPNR	GWTC						
123	Outbound	o1	ACynML	BPMS	1					
123	Outbound	o2	BPMS	ACynML	1					
123	Outbound	o3	GWTC	ACynML	16					
123	Outbound	o3	GWTC	FPNR						
123	Inbound	i4	NuComE	GWTC					21	
123	Outbound	o4	GWTC	NuComE					21	
129	Inbound	i1	BPMS	BrMalS					29	16
129	Inbound	i1	BchLaH	LPKraW	18	17		15		
129	Outbound	o1	BrMalS	BPMS					29	16
129	Outbound	o2	BrMalS	BchLaH				1		
129	Outbound	o1	KrCorN	BchLaH	16	15		12		
143	Inbound	i1	BrMalS	BchLaH						
143	Inbound	i1	BrMILZ	BchLaH	16	14		13	24	21
143	Outbound	o1	BchLaH	BrMalS						
143	Outbound	o1	BchLaH	BrMILZ	16	13		11	24	21
150	Inbound	i1	SuBriW	SuBriW	15				19	
150	Outbound	o1	SuPaCE	SuPaCE	15				19	
153	Inbound	i1	ARTIC	BrMILZ	15	14		13		
153	Outbound	o1	BrMILZ	ARTIC	15	14		13		
164	Inbound	i1	ICAItS	TusSta						
164	Outbound	o1	TusSta	ICAItS						
167	Inbound	i1	MarVil	CaMeaN	15				16	
167	Outbound	o1	CaMeaN	MarVil	15				16	
167a	Inbound	i1	MarVil	LarSqu						

167a	Outbound	o1	LarSqu	MarVil					
177	Inbound	i1	LHTC	TCAItS	17	8			
177	Outbound	o1	TCAItS	LHTC	18	9			
177	Inbound	i2	LHTC	MRLoAW			16	12	
177	Outbound	o2	MRLoAW	LHTC			16	12	
178	Inbound	i1	YoGoWW	UnCenE	14		21		
178	Outbound	o1	UnCenE	YoGoWW	14		21		
400	Inbound	i1	JWA	TusSta	14		14		
400	Outbound	o1	TusSta	JWA	15		15		
401	Inbound	i1	TusSta	BusCen	17		17		
401	Outbound	o1	BusCen	TusSta	14		14		
403	Inbound	i1	SCWatS	IrvSta	23		23		
403	Inbound	i2	SCWatS	IrvSta	1		1		
403	Outbound	o1	IrvSta	SCWatN	21		21		
405	Inbound	i1	TusSta	TusSta	15		15		
453	Inbound	i1	OTC	LVPePW	6		6		
453	Outbound	o1	MaLaVS	OTC	6		6		
463	Inbound	i1	SCPLZ	SARTC	6				
463	Outbound	o1	SARTC	BrAntN	7				
472	Inbound	i1	FDABId	TusSta	5		5		
472	Outbound	o1	TusSta	FDABId	5		5		
473	Inbound	i1	TusSta	UnCenW	7		7		
473	Outbound	o1	UnCenE	TusSta	6		6		
480	Inbound	i1	LFRegS	IrvSta	3		3		
480	Outbound	o1	IrvSta	LFRegN	5		5		
529	Inbound	o1	GWTC	FPNR			26		
529	Outbound	i1	FPNR	GWTC			26		
543	Inbound	i1	HaMcAN	FTC	34	27	27	42	
543	Outbound	o1	FTC	MrHarW	34	27	27	42	
553	Inbound	i1	ARTIC	BrMcAr				36	
553	Outbound	o1	BrMcAr	ARTIC				36	
560	Inbound	i1	7Chanl	SARTC	32				
560	Inbound	i1	WeGoWE	SARTC				42	
560	Outbound	o1	SARTC	7Chanl	32				
560	Outbound	o1	SARTC	WeGoWE				42	
862	Inbound	i1	SARTC	SARTC	74	50	50	74	50

Demographics by Pattern

Route	Direction	Via	From	To	½ Mile Demographics			
					Low Income	Non Low Income	Minority	Non Minority
1	Inbound	i1	EICSaM	7Chanl	13,541	114,471	29,563	98,983
1	Inbound	i2	EICSaM	NPTC	8,944	66,095	17,600	57,637
1	Outbound	o1	7Chanl	EICSaM	13,619	114,677	29,550	99,275
1	Outbound	o2	NPTC	EICSaM	8,961	66,142	17,590	57,711
25	Inbound	i1	FPNR	PCH1st	27,213	101,576	79,977	49,716
25	Outbound	o1	PCH1st	FPNR	28,161	105,352	83,200	51,244
26	Inbound	i2	FTC	NuComE	7,310	18,238	18,593	8,477
26	Inbound	i1	LeLakW	BPMS				
26	Inbound	i1	LeLakW	FPNR	20,675	72,518	62,074	33,323
26	Outbound	o1	BPMS	LeLakW				
26	Outbound	o1	FPNR	LeLakW	20,898	73,136	62,617	33,619
29	Inbound	i1	BchLaH	PC1stS	45,352	130,549	121,708	55,793
29	Inbound	i2	PC1stS	BPMS	45,005	127,614	120,446	53,773
29	Outbound	o2	BPMS	PC1stS	45,394	130,892	121,661	56,230
29	Outbound	o1	PC1stS	BchLaH	45,062	128,029	120,448	54,247
29	Inbound	i3	PC1stS	BPMS	45,352	130,549	121,708	55,793
29	Outbound	o3	BPMS	PC1stS	45,062	128,029	120,448	54,247
30	Inbound	i1	CerCtr	EsFaiW	22,867	87,594	81,440	29,471
30	Outbound	o1	EsFaiW	CerCtr	22,564	82,549	79,102	26,443
33	Inbound	i1	FPNR	MagPCH	31,134	116,276	103,969	44,008
33	Outbound	o1	MagPCH	FPNR	30,716	115,129	102,576	43,824
35	Inbound	i1	19MeyW	FPNR	38,337	136,686	126,171	50,306
35	Outbound	o1	FPNR	Ne18tS	39,583	140,591	128,173	53,502
37	Inbound	i1	1stMai	TalMtW	38,451	124,079	129,131	34,766
37	Inbound	i1	FTC	TalMtW				
37	Outbound	o1	MaHylW	1stMai	35,610	114,314	119,737	31,371
37	Outbound	o1	MaHylW	FTC				
38	Inbound	i1	CerCtr	EsFaiW	28,960	103,752	103,858	29,866
38	Inbound	i1	DAPIOW	AHFest				
38	Outbound	o1	AHFest	DAPIOW				
38	Outbound	o1	EsFaiW	CerCtr	28,740	100,431	102,219	27,957
42	Inbound	i1	CaNorE	VOrSZ5				
42	Inbound	i3	ElMaiW	VOrSZ5				
42	Inbound	i2	VOrSZ5	CaNorE				
42	Inbound	i4	VOrSZ5	CaNorE				
42	Inbound	i42a	VOrSZ5	CaNorE	35,789	123,105	120,593	39,449
42	Inbound	i4	VOrSZ5	ElMaiW	34,524	119,493	116,587	38,526
42	Outbound	o1	CaNorE	VOrSZ5				

42	Outbound	o2	CaNorE	VOrSZ5				
42	Outbound	o42a	CaNorE	VOrSZ5	34,499	115,091	115,568	35,155
42	Outbound	o2	ElMaiW	VOrSZ5	33,205	111,379	111,460	34,204
42	Outbound	o3	VOrSZ5	ElMaiW				
42	Inbound	i5	VOrSZ5	NoWarN	35,789	123,105	120,593	39,449
42	Inbound	i5a	VOrSZ5	NoWarN	34,524	119,493	116,587	38,526
42	Outbound	o5	NoWarN	VOrSZ5	34,499	115,091	115,568	35,155
42	Outbound	o5a	NoWarN	VOrSZ5	33,205	111,379	111,460	34,204
43	Inbound	i3	19NewW	BrWVVS				
43	Inbound	i3	19NewW	FTC	46,675	113,863	127,554	35,019
43	Inbound	i2	BrWVVS	Ne18tS				
43	Inbound	i1	HaMcAN	FTC				
43	Outbound	o2	BrWVVS	19NewW				
43	Outbound	o2	FTC	19NewW	47,026	114,707	127,888	35,909
43	Outbound	o1	HaBerN	BrWVVS				
46	Inbound	i2	ElMaiW	VOrSZ3	33,842	126,151	107,750	54,945
46	Inbound	i1	NoWarN	VOrSZ3				
46	Outbound	o2	VOrSZ3	ElMaiW	33,565	124,186	106,718	53,725
46	Outbound	o1	VOrSZ3	NoWarN				
46a	Inbound	i1	NoWarN	VOrSZ3	31,388	102,061	98,591	37,228
46a	Outbound	o1	VOrSZ3	NoWarN	31,353	101,748	98,739	36,731
47	Inbound	i2	FTC	Ba23rN				
47	Inbound	i5	FTC	Ba23rN	60,493	149,771	170,362	46,341
47	Inbound	i3	FTC	OcFPlm				
47	Inbound	i4	FTC	OcFPlm				
47	Inbound	i1	FaArlN	FaWesN	19,790	49,213	60,809	8,984
47	Outbound	o2	Ba23rN	FTC				
47	Outbound	o4	Ba23rN	FTC	60,574	149,795	170,561	46,250
47	Outbound	o1	FaWesS	Ba23rN	32,051	86,036	88,884	30,994
47	Outbound	o3	OcFPlm	FTC				
50	Inbound	i2	7Chanl	VOrSZ2				
50	Inbound	i1	VOrSZ2	7Chanl	27,036	78,491	78,451	27,778
50	Outbound	o1	7Chanl	VOrSZ2	27,394	80,726	79,591	29,239
53	Inbound	i1	MaMaPW	ARTIC	30,169	65,635	83,880	12,557
53	Inbound	i1	MaPIA	ARTIC				
53	Inbound	i2	YLAItW	ARTIC	35,441	88,250	99,383	24,970
53	Outbound	o2	ARTIC	MaMaPW	30,298	65,980	84,225	12,686
53	Outbound	o1	ARTIC	MaPIA				
53	Outbound	o1	ARTIC	YLAItW	35,792	91,507	101,408	26,553
54	Inbound	i3	ChHarE	OTC				
54	Inbound	i2	ChVaVE	RSChaN				
54	Inbound	i1	ChVaVE	SCClge	25,082	101,872	87,480	43,173
54	Outbound	o3	OTC	ChHarW				

54	Outbound	o2	RSChaN	ChVaVE				
54	Outbound	o1	SCClge	ChVaVE	25,350	106,289	89,380	46,312
55	Inbound	i3	FaArIN	Fl6thN				
55	Inbound	i1	Fl6thN	NPTC	47,567	123,714	121,766	53,292
55	Outbound	o1	NPTC	Fl6thN	48,316	124,757	123,962	52,915
56	Inbound	i2	BeVaVE	OTC				
56	Inbound	i1	OTC	BeVaVE	28,636	100,990	99,035	34,659
56	Outbound	o2	BeVaVE	OTC	28,777	102,365	99,697	35,483
56	Outbound	o2	ChVaVE	OTC				
56	Outbound	o1	OTC	ChVaVE				
57	Inbound	i1	AnSakW	SCOras				
57	Inbound	i2	NPTC	BrMalS	40,805	137,964	141,807	46,226
57	Inbound	i2	NPTC	BrMILZ				
57	Outbound	o1	BrMalS	NPTC	40,643	137,392	141,292	45,936
57	Outbound	o1	BrMILZ	NPTC				
57	Outbound	o4	StCVBu	AnSakW				
57	Outbound	o3	StCVBu	NPTC				
57a	Inbound	i1	AnSakW	NuComE	36,856	107,080	128,276	24,176
57a	Outbound	o1	NuComE	AnSakW	37,023	107,948	128,978	24,539
59	Inbound	i1	KrCorS	TRParE				
59	Inbound	i2	UnCenE	BrMalS	34,037	101,195	96,530	43,406
59	Inbound	i2	UnCenE	LPKraW				
59	Outbound	o2	BrMalS	UnCenE	33,519	100,530	96,070	42,763
59	Outbound	o2	KrCorS	UnCenE				
59	Outbound	o1	TRParE	LPKraW				
60	Inbound	i2	7Chanl	LarSqu	44,721	119,654	126,874	39,133
60	Inbound	i3	MaLocE	FrTusE				
60	Inbound	i1	MaLocE	LarSqu				
60	Inbound	i3	WeGoWE	SARTC	42,247	80,364	110,895	12,864
60	Outbound	o3	FrTusE	MaLocE				
60	Outbound	o1	LarSqu	7Chanl	44,147	118,898	125,532	39,126
60	Outbound	o2	LarSqu	MaLocE				
60	Outbound	o2	SARTC	WeGoWE	42,508	80,928	111,259	13,352
64	Inbound	i1	EdBolN	LarSqu	50,386	98,798	134,941	17,551
64	Inbound	i2	WestMI	LarSqu				
64	Outbound	o1	LarSqu	EdBolN	50,777	100,601	136,240	18,481
66	Inbound	i2	GWTC	BrNewE	50,705	116,578	149,363	18,874
66	Inbound	i1	GWTC	IrvVCo	55,353	145,366	170,092	31,534
66	Outbound	o1	BrNewE	GWTC	50,781	116,817	149,650	18,909
66	Outbound	o2	IrvVCo	GWTC	55,416	145,450	170,325	31,447
70	Inbound	i1	TusSta	GWTC				
70	Inbound	i2	TusSta	WarPCH	31,170	117,272	109,070	40,069
70	Outbound	o1	GWTC	TusSta				

70	Outbound	o2	WarPCH	TusSta	30,884	116,825	108,376	40,027
70a	Inbound	i1	TusSta	EdHarW	18,380	58,019	69,048	7,882
70a	Outbound	o1	HaEdiS	TusSta	18,407	58,790	69,775	7,949
71	Inbound	i1	CoNutS	SuPlaN	33,030	136,733	102,049	70,536
71	Inbound	i1	RoYoLS	SuPlaN				
71	Outbound	o1	SuPlaN	CoNutS	33,212	137,777	102,581	71,397
71	Outbound	o1	SuPlaN	RoYoLS				
72	Inbound	i1	WarPCH	TusLeg				
72	Inbound	i1	WarPCH	TusSta	22,662	94,802	78,934	39,360
72	Outbound	o1	TusLeg	WarPCH				
72	Outbound	o1	TusSta	WarPCH	22,610	94,044	78,464	39,019
76	Inbound	i1	TaBeaW	DuMicE				
76	Outbound	o1	DuMicE	TaBeaW				
79	Inbound	i2	LarSqu	NPTC	20,826	94,060	64,183	55,731
79	Inbound	i1	NPTC	LarSqu				
79	Outbound	o1	LarSqu	NPTC				
79	Outbound	o2	NPTC	LarSqu	20,908	94,177	64,379	55,763
82	Inbound	i2	PTADPS	TCAItS				
82	Inbound	i1	TCAItS	PTADPS				
83	Inbound	i1	FPNR	LHTC	59,231	159,443	171,478	52,605
83	Inbound	i1	MaHarW	LHTC				
83	Outbound	o1	LHTC	FPNR	59,538	159,932	170,939	53,481
83	Outbound	o1	LHTC	MaHarW				
83	Outbound	o2	MaHarW	SASanE				
83	Outbound	o3	SASanE	LHTC				
83	Outbound	o4	SASanW	MaHarW				
85	Inbound	i1	NiCrVN	LAMuRN	5,507	55,791	19,778	41,736
85	Outbound	o1	LAMuRN	NiCrVN	5,420	54,361	19,288	40,707
86	Inbound	i1	MaPIA	IrvSta	15,769	96,639	58,735	54,053
86	Inbound	i1	SuBriW	MurCtr	15,001	90,963	54,120	52,161
86	Outbound	o1	IrvSta	MaPIA	15,001	90,963	54,120	52,161
86	Outbound	o1	MurCtr	SuBriW	14,621	79,610	52,434	42,051
87	Inbound	i1	NiCrVN	EmAveN				
87	Inbound	i1	NiCrVN	LHTC	5,180	33,490	16,483	22,451
87	Outbound	o1	EmAveN	NiCrVN				
87	Outbound	o1	LHTC	NiCrVN	5,196	34,309	16,536	23,240
89	Inbound	i1	LAMuRN	LBBS				
89	Inbound	i1	SMAnto	LBBS	12,071	86,144	41,251	57,243
89	Outbound	o1	LBBS	LAMuRN				
89	Outbound	o1	LBBS	SMAnto	12,028	85,355	40,991	56,670
90	Inbound	i1	TusSta	GLDPHN	16,956	102,052	51,932	67,399
90	Outbound	o1	GLDPHN	TusSta	16,628	100,730	51,386	66,295
91	Inbound	i1	LHTC	LMPicS	12,344	68,046	33,880	47,008

91	Outbound	o1	LMPicS	LHTC	12,619	69,193	34,373	47,939
123	Inbound	i1	ACynML	GWTC				
123	Inbound	i2	BPMS	GWTC	23,682	113,586	88,291	50,815
123	Inbound	i2	FPNR	GWTC				
123	Outbound	o1	ACynML	BPMS				
123	Outbound	o2	BPMS	ACynML				
123	Outbound	o3	GWTC	ACynML	23,321	112,986	87,217	50,930
123	Outbound	o3	GWTC	FPNR				
123	Inbound	i4	NuComE	GWTC	23,682	113,586	88,291	50,815
123	Outbound	o4	GWTC	NuComE	23,321	112,986	87,217	50,930
129	Inbound	i1	BPMS	BrMalS	16,506	63,266	59,988	20,279
129	Inbound	i1	BchLaH	LPKraW				
129	Outbound	o1	BrMalS	BPMS	16,527	63,502	60,132	20,391
129	Outbound	o2	BrMalS	BchLaH				
129	Outbound	o1	KrCorN	BchLaH				
143	Inbound	i1	BrMalS	BchLaH				
143	Inbound	i1	BrMILZ	BchLaH	13,293	61,429	49,565	26,299
143	Outbound	o1	BchLaH	BrMalS				
143	Outbound	o1	BchLaH	BrMILZ	12,730	59,469	47,335	26,006
150	Inbound	i1	SuBriW	SuBriW	45,808	105,038	139,148	15,455
150	Outbound	o1	SuPaCE	SuPaCE	45,851	105,228	139,332	15,508
153	Inbound	i1	ARTIC	BrMILZ				
153	Outbound	o1	BrMILZ	ARTIC				
164	Inbound	i1	ICAItS	TusSta	6,780	46,954	33,475	20,648
164	Outbound	o1	TusSta	ICAItS	6,974	47,917	34,168	21,111
167	Inbound	i1	MarVil	CaMeaN	25,596	123,389	85,536	66,969
167	Outbound	o1	CaMeaN	MarVil	25,881	125,683	86,708	68,276
167a	Inbound	i1	MarVil	LarSqu	22,429	80,497	66,146	39,824
167a	Outbound	o1	LarSqu	MarVil	22,432	80,764	66,234	39,912
177	Inbound	i1	LHTC	TCAItS				
177	Outbound	o1	TCAItS	LHTC				
177	Inbound	i2	LHTC	MRLoAW	9,375	66,181	35,090	40,881
177	Outbound	o2	MRLoAW	LHTC	9,444	66,675	35,326	41,207
178	Inbound	i1	YoGoWW	UnCenE	14,685	70,837	35,417	52,794
178	Outbound	o1	UnCenE	YoGoWW	15,548	69,016	36,060	51,333
400	Inbound	i1	JWA	TusSta	3,690	14,401	10,795	7,320
400	Outbound	o1	TusSta	JWA	3,624	13,451	10,231	6,867
401	Inbound	i1	TusSta	BusCen	6,221	20,313	16,152	10,422
401	Outbound	o1	BusCen	TusSta	6,267	20,733	16,422	10,619
403	Inbound	i1	SCWatS	IrvSta	2,113	10,525	6,895	5,819
403	Inbound	i2	SCWatS	IrvSta	1,668	7,425	4,951	4,219
403	Outbound	o1	IrvSta	SCWatN	2,138	10,556	6,911	5,859
405	Inbound	i1	TusSta	TusSta	2,480	11,144	8,726	4,898

453	Inbound	i1	OTC	LVPePW	5,522	18,113	14,695	9,275
453	Outbound	o1	MaLaVS	OTC	5,521	18,102	14,689	9,269
463	Inbound	i1	SCPLZ	SARTC				
463	Outbound	o1	SARTC	BrAntN				
472	Inbound	i1	FDABld	TusSta	4,815	19,112	14,982	9,155
472	Outbound	o1	TusSta	FDABld	5,049	19,877	15,709	9,780
473	Inbound	i1	TusSta	UnCenW	12,577	32,293	29,627	17,573
473	Outbound	o1	UnCenE	TusSta	12,631	32,530	29,818	17,688
480	Inbound	i1	LFRegS	IrvSta	2,255	16,333	9,003	9,717
480	Outbound	o1	IrvSta	LFRegN	2,292	16,526	9,115	9,836
529	Inbound	o1	GWTC	FPNR	31,097	76,279	87,132	21,303
529	Outbound	i1	FPNR	GWTC	30,055	72,598	83,264	20,438
543	Inbound	i1	HaMcAN	FTC	37,988	85,781	107,705	17,659
543	Outbound	o1	FTC	MrHarW	37,987	85,837	107,697	17,717
553	Inbound	i1	ARTIC	BrMcAr	33,141	81,870	97,318	18,398
553	Outbound	o1	BrMcAr	ARTIC	32,307	75,884	92,424	16,412
560	Inbound	i1	7Chanl	SARTC				
560	Inbound	i1	WeGoWE	SARTC	42,247	80,364	110,895	12,864
560	Outbound	o1	SARTC	7Chanl				
560	Outbound	o1	SARTC	WeGoWE	42,508	80,928	111,259	13,352
862	Inbound	i1	SARTC	SARTC	17,586	21,195	38,178	3,315

Annual Person-Trips

Route	Direction	Via	From	To	Annual Person Trips Before				Annual Person Trips After			
					Low Income	Non Low Income	Minority	Non Minority	Low Income	Non Low Income	Minority	Non Minority
1	Inbound	i1	EICSaM	7ChanI	69,191,576	584,905,222	151,057,876	505,765,320	79,080,828	668,509,031	172,645,287	578,060,455
1	Inbound	i2	EICSaM	NPTC	3,264,485	24,124,497	6,424,035	21,037,496	-	-	-	-
1	Outbound	o1	7ChanI	EICSaM	74,559,474	627,812,799	161,777,784	543,489,564	79,534,846	669,712,904	172,570,684	579,765,147
1	Outbound	o2	NPTC	EICSaM	13,709,608	101,197,846	26,913,153	88,297,976	13,709,608	101,197,845	26,913,152	88,297,975
25	Inbound	i1	FPNR	PCH1st	170,609,131	585,990,756	491,969,389	269,759,640	281,706,876	1,051,518,468	827,919,813	514,664,856
25	Outbound	o1	PCH1st	FPNR	171,625,403	592,237,407	497,360,681	271,662,039	291,519,454	1,090,602,719	861,288,178	530,479,654
26	Inbound	i2	FTC	NuComE	1,864,112	4,650,632	4,741,298	2,161,626	-	-	-	-
26	Inbound	i1	LeLakW	BPMS	-	-	-	-	-	-	-	-
26	Inbound	i1	LeLakW	FPNR	169,159,796	622,449,315	534,965,376	273,822,651	234,559,084	822,714,360	704,227,793	378,048,771
26	Outbound	o1	BPMS	LeLakW	-	-	-	-	-	-	-	-
26	Outbound	o1	FPNR	LeLakW	170,454,698	626,560,642	538,369,913	275,773,805	237,082,840	829,732,369	710,393,576	381,403,985
29	Inbound	i1	BchLaH	PC1stS	463,302,842	1,450,762,474	1,340,180,137	591,820,802	-	-	-	-
29	Inbound	i2	PC1stS	BPMS	391,335,211	1,144,346,337	1,066,352,305	483,227,750	518,909,375	1,471,391,691	1,388,747,518	619,997,400
29	Outbound	o2	BPMS	PC1stS	392,038,870	1,153,803,135	1,141,626,337	502,025,534	523,397,691	1,509,186,010	1,402,752,072	648,329,175
29	Outbound	o1	PC1stS	BchLaH	461,984,504	1,390,110,300	1,214,871,052	559,315,992	-	-	-	-
29	Inbound	i3	PC1stS	BPMS	-	-	-	-	184,129,978	530,026,959	494,132,960	226,518,517
29	Outbound	o3	BPMS	PC1stS	-	-	-	-	182,952,455	519,796,330	489,018,972	220,243,259
30	Inbound	i1	CerCtr	EsFaiW	151,837,486	581,626,518	540,764,024	195,684,598	241,019,139	923,244,498	858,381,444	310,619,826
30	Outbound	o1	EsFaiW	CerCtr	149,827,502	548,122,564	525,235,964	175,584,458	237,828,594	870,062,013	833,732,986	278,713,880
33	Inbound	i1	FPNR	MagPCH	126,093,797	470,915,888	421,072,704	178,234,359	300,352,308	1,121,710,009	1,002,984,775	424,549,839
33	Outbound	o1	MagPCH	FPNR	132,231,337	495,631,480	441,590,812	188,661,476	296,314,913	1,110,652,000	989,553,204	422,768,233
35	Inbound	i1	19MeyW	FPNR	327,917,489	1,148,214,030	1,069,908,023	418,278,360	387,394,269	1,381,209,444	1,274,957,398	508,337,730
35	Outbound	o1	FPNR	Ne18tS	328,214,310	1,147,264,074	1,055,167,039	432,434,271	399,984,537	1,420,671,411	1,295,186,093	540,641,067
37	Inbound	i1	1stMai	TalMtW	430,127,868	1,418,749,444	1,451,136,955	412,927,589	430,654,480	1,389,684,921	1,446,266,946	389,384,120
37	Inbound	i1	FTC	TalMtW	-	-	-	-	-	-	-	-
37	Outbound	o1	MaHylW	1stMai	376,756,100	1,209,442,531	1,266,817,730	331,904,651	398,834,451	1,280,317,254	1,341,054,720	351,354,640
37	Outbound	o1	MaHylW	FTC	-	-	-	-	-	-	-	-
38	Inbound	i1	CerCtr	EsFaiW	-	-	-	-	349,551,526	1,252,291,798	1,253,568,460	360,486,488
38	Inbound	i1	DAPIO	AHFest	335,174,896	1,255,714,246	1,214,981,967	387,632,768	-	-	-	-
38	Outbound	o1	AHFest	DAPIO	330,768,169	1,256,558,531	1,204,511,549	394,304,461	-	-	-	-
38	Outbound	o1	EsFaiW	CerCtr	-	-	-	-	346,894,076	1,212,201,143	1,233,779,312	337,446,421
42	Inbound	i1	CaNorE	VORsZ5	158,169,406	528,568,362	530,658,490	161,231,177	-	-	-	-
42	Inbound	i3	ElMaiW	VORsZ5	222,502,723	838,238,610	751,055,852	318,499,778	-	-	-	-
42	Inbound	i2	VORsZ5	CaNorE	147,178,122	492,891,686	492,426,065	152,392,900	-	-	-	-
42	Inbound	i4	VORsZ5	CaNorE	-	-	-	-	-	-	-	-
42	Inbound	i42a	VORsZ5	CaNorE	-	-	-	-	-	-	-	-
42	Inbound	i4	VORsZ5	ElMaiW	71,308,079	271,069,971	240,541,105	104,630,476	-	-	-	-
42	Outbound	o1	CaNorE	VORsZ5	3,782,222	12,572,118	12,663,729	3,814,909	-	-	-	-

42	Outbound	o2	CaNorE	VORsZ5	-	-	-	-	-	-	-	-	-
42	Outbound	o42a	CaNorE	VORsZ5	-	-	-	-	-	-	-	-	-
42	Outbound	o2	EIMaiW	VORsZ5	74,186,498	281,901,294	250,955,571	108,069,139	-	-	-	-	-
42	Outbound	o3	VORsZ5	EIMaiW	239,189,817	901,632,017	805,200,021	345,015,689	-	-	-	-	-
42	Inbound	i5	VORsZ5	NoWarN	-	-	-	-	498,892,201	1,716,084,749	1,681,064,060	549,924,721	-
42	Inbound	i5a	VORsZ5	NoWarN	-	-	-	-	176,074,044	609,414,707	594,592,911	196,482,478	-
42	Outbound	o5	NoWarN	VORsZ5	-	-	-	-	480,921,602	1,604,374,434	1,611,023,705	490,061,273	-
42	Outbound	o5a	NoWarN	VORsZ5	-	-	-	-	169,347,530	568,030,846	568,446,119	174,442,531	-
43	Inbound	i3	19NewW	BrWVVS	91,197,717	224,633,409	248,299,479	71,674,214	-	-	-	-	-
43	Inbound	i3	19NewW	FTC	-	-	-	-	949,935,619	2,317,334,477	2,595,988,233	712,712,245	-
43	Inbound	i2	BrWVVS	Ne18tS	717,793,391	1,753,480,525	1,938,403,052	565,793,682	-	-	-	-	-
43	Inbound	i1	HaMcAN	FTC	9,715,746	21,933,163	27,508,665	4,548,908	-	-	-	-	-
43	Outbound	o2	BrWVVS	19NewW	259,252,797	637,527,673	702,326,941	206,276,813	-	-	-	-	-
43	Outbound	o2	FTC	19NewW	-	-	-	-	957,076,988	2,334,512,943	2,602,774,572	730,812,072	-
43	Outbound	o1	HaBerN	BrWVVS	739,294,694	1,813,632,701	2,019,626,019	566,837,543	-	-	-	-	-
46	Inbound	i2	EIMaiW	VORsZ3	-	-	-	-	222,341,052	828,809,491	707,919,054	360,986,698	-
46	Inbound	i1	NoWarN	VORsZ3	214,220,984	696,562,977	672,884,519	254,083,722	-	-	-	-	-
46	Outbound	o2	VORsZ3	EIMaiW	-	-	-	-	220,523,934	815,899,306	701,137,738	352,974,213	-
46	Outbound	o1	VORsZ3	NoWarN	210,535,851	683,238,814	663,035,196	246,651,948	-	-	-	-	-
46a	Inbound	i1	NoWarN	VORsZ3	-	-	-	-	96,046,330	312,305,155	301,688,880	113,918,854	-
46a	Outbound	o1	VORsZ3	NoWarN	-	-	-	-	95,940,387	311,349,328	302,142,617	112,398,354	-
47	Inbound	i2	FTC	Ba23rN	360,596,315	889,164,197	1,011,644,333	276,403,307	-	-	-	-	-
47	Inbound	i5	FTC	Ba23rN	176,640,825	437,330,166	497,456,448	135,314,501	1,247,072,130	3,087,521,030	3,512,008,465	955,311,117	-
47	Inbound	i3	FTC	OcFPlm	134,095,442	339,261,228	374,337,990	113,118,650	-	-	-	-	-
47	Inbound	i4	FTC	OcFPlm	295,174,404	743,739,286	820,935,391	248,944,876	-	-	-	-	-
47	Inbound	i1	FaArIN	FaWesN	10,092,705	25,098,686	31,012,523	4,582,055	-	-	-	-	-
47	Outbound	o2	Ba23rN	FTC	327,458,652	806,467,044	918,516,365	250,154,132	-	-	-	-	-
47	Outbound	o4	Ba23rN	FTC	309,534,967	765,450,461	871,565,581	236,339,563	1,248,740,387	3,088,015,910	3,516,110,474	953,452,075	-
47	Outbound	o1	FaWesS	Ba23rN	8,173,080	21,939,149	22,665,473	7,903,474	-	-	-	-	-
47	Outbound	o3	OcFPlm	FTC	399,504,001	1,006,079,723	1,110,760,085	336,698,904	-	-	-	-	-
50	Inbound	i2	7ChanI	VORsZ2	410,149,605	1,208,633,175	1,191,639,006	437,767,066	-	-	-	-	-
50	Inbound	i1	VORsZ2	7ChanI	410,273,844	1,191,105,245	1,190,487,110	421,526,353	534,505,023	1,551,772,682	1,550,967,369	549,164,807	-
50	Outbound	o1	7ChanI	VORsZ2	-	-	-	-	541,588,142	1,595,957,652	1,573,517,447	578,056,029	-
53	Inbound	i1	MaMaPW	ARTIC	462,825,655	1,006,912,696	1,286,803,078	192,641,513	280,875,229	611,065,591	780,922,802	116,908,449	-
53	Inbound	i1	MaPIA	ARTIC	-	-	-	-	-	-	-	-	-
53	Inbound	i2	YLAItW	ARTIC	418,916,713	1,043,109,665	1,174,707,337	295,147,466	395,241,898	984,158,967	1,108,319,481	278,467,390	-
53	Outbound	o2	ARTIC	MaMaPW	446,022,336	971,287,457	1,239,872,738	186,757,407	282,077,847	614,271,193	784,132,546	118,110,963	-
53	Outbound	o1	ARTIC	MaPIA	-	-	-	-	-	-	-	-	-
53	Outbound	o1	ARTIC	YLAItW	448,585,729	1,146,859,359	1,270,948,580	332,790,361	399,156,476	1,020,487,960	1,130,903,903	296,120,493	-
54	Inbound	i3	ChHarE	OTC	8,773,616	29,271,014	29,996,432	11,114,564	-	-	-	-	-
54	Inbound	i2	ChVaVE	RSChaN	38,434,018	143,728,303	130,524,050	57,348,944	-	-	-	-	-
54	Inbound	i1	ChVaVE	SCClge	256,587,255	1,042,154,799	894,916,733	441,663,937	341,363,881	1,386,483,559	1,190,597,916	587,590,049	-
54	Outbound	o3	OTC	ChHarW	4,636,389	15,259,003	15,563,610	5,943,968	-	-	-	-	-

54	Outbound	o2	RSChaN	ChVaVE	40,295,780	157,598,526	138,942,615	65,408,742	-	-	-	-
54	Outbound	o1	SCCIGE	ChVaVE	265,799,267	1,114,443,548	937,149,814	485,580,281	345,019,361	1,446,597,681	1,216,462,463	630,304,971
55	Inbound	i3	FaArIN	Fl6thN	3,635,321	7,922,048	9,936,580	1,917,929	-	-	-	-
55	Inbound	i1	Fl6thN	NPTC	640,201,817	1,665,065,629	1,638,845,082	717,250,536	604,098,613	1,571,166,788	1,546,424,913	676,802,283
55	Outbound	o1	NPTC	Fl6thN	617,530,834	1,594,524,085	1,584,364,002	676,306,207	613,617,221	1,584,418,760	1,574,323,069	672,020,101
56	Inbound	i2	BeVaVE	OTC	180,573,315	642,342,609	625,600,939	222,653,222	-	-	-	-
56	Inbound	i1	OTC	BeVaVE	176,541,786	622,600,884	610,553,381	213,673,517	320,724,739	1,131,083,525	1,109,196,740	388,182,222
56	Outbound	o2	BeVaVE	OTC	-	-	-	-	322,298,187	1,146,491,987	1,116,610,441	397,404,952
56	Outbound	o2	ChVaVE	OTC	79,716,900	293,187,336	279,969,680	104,025,788	-	-	-	-
56	Outbound	o1	OTC	ChVaVE	77,326,612	273,010,581	267,610,516	93,717,427	-	-	-	-
57	Inbound	i1	AnSakW	SCOras	289,602,140	837,058,620	1,014,037,072	173,048,991	-	-	-	-
57	Inbound	i2	NPTC	BrMalS	-	-	-	-	585,831,234	1,980,755,046	2,035,922,032	663,667,413
57	Inbound	i2	NPTC	BrMilZ	1,156,972,842	3,911,842,919	4,020,793,602	1,310,693,453	-	-	-	-
57	Outbound	o1	BrMalS	NPTC	-	-	-	-	583,509,972	1,972,539,013	2,028,531,744	659,499,099
57	Outbound	o1	BrMilZ	NPTC	1,085,486,742	3,680,802,193	3,779,044,518	1,232,403,947	-	-	-	-
57	Outbound	o4	StCVBu	AnSakW	265,279,080	788,556,169	947,561,884	162,915,117	-	-	-	-
57	Outbound	o3	StCVBu	NPTC	33,142,806	108,707,007	115,042,474	33,731,334	-	-	-	-
57a	Inbound	i1	AnSakW	NuComE	-	-	-	-	506,511,935	1,471,599,770	1,762,896,680	332,254,976
57a	Outbound	o1	NuComE	AnSakW	-	-	-	-	508,808,182	1,483,524,175	1,772,548,240	337,238,359
59	Inbound	i1	KrCorS	TRParE	42,852,287	108,120,354	116,879,032	39,106,280	-	-	-	-
59	Inbound	i2	UnCenE	BrMalS	-	-	-	-	324,035,990	963,380,097	918,964,874	413,223,547
59	Inbound	i2	UnCenE	LPKraW	195,990,933	435,800,540	478,528,737	185,381,335	-	-	-	-
59	Outbound	o2	BrMalS	UnCenE	-	-	-	-	319,103,280	957,042,872	914,584,167	407,107,176
59	Outbound	o2	KrCorS	UnCenE	170,061,269	386,359,227	424,272,027	160,124,050	-	-	-	-
59	Outbound	o1	TRParE	LPKraW	39,695,667	99,733,723	107,959,380	36,150,732	-	-	-	-
60	Inbound	i2	7ChanI	LarSqu	397,126,891	1,062,530,804	1,126,638,562	347,497,232	789,781,642	2,113,096,177	2,240,589,774	691,081,203
60	Inbound	i3	MaLocE	FrTusE	81,553,065	173,932,186	223,524,525	34,597,680	-	-	-	-
60	Inbound	i1	MaLocE	LarSqu	347,388,683	826,053,664	966,853,708	218,406,609	-	-	-	-
60	Inbound	i3	WeGoWE	SARTC	-	-	-	-	92,944,203	176,801,578	243,968,761	28,299,864
60	Outbound	o3	FrTusE	MaLocE	84,668,534	180,097,962	232,101,902	35,362,289	-	-	-	-
60	Outbound	o1	LarSqu	7ChanI	793,764,106	2,137,782,497	2,257,062,958	703,492,171	779,637,058	2,099,735,206	2,216,892,781	690,971,729
60	Outbound	o2	LarSqu	MaLocE	329,757,088	783,965,990	919,450,438	205,489,975	-	-	-	-
60	Outbound	o2	SARTC	WeGoWE	-	-	-	-	93,517,440	178,040,927	244,769,384	29,373,670
64	Inbound	i1	EdBoIN	LarSqu	1,009,481,658	1,979,415,540	2,703,537,512	351,639,591	1,289,476,163	2,528,435,374	3,453,403,178	449,171,964
64	Inbound	i2	WestMI	LarSqu	97,804,621	191,682,535	261,923,015	33,987,142	-	-	-	-
64	Outbound	o1	LarSqu	EdBoIN	1,168,843,989	2,315,738,502	3,136,111,325	425,409,653	1,299,494,135	2,574,585,329	3,486,657,158	472,960,762
66	Inbound	i2	GWTC	BrNewE	512,626,282	1,178,600,058	1,510,061,353	190,816,392	617,838,897	1,420,498,682	1,819,989,865	229,979,995
66	Inbound	i1	GWTC	IrvVCo	555,195,533	1,458,024,452	1,706,022,548	316,289,652	739,245,894	1,941,367,546	2,271,578,366	421,141,407
66	Outbound	o1	BrNewE	GWTC	515,175,569	1,185,110,641	1,518,203,893	191,830,058	618,769,274	1,423,417,756	1,823,490,819	230,404,069
66	Outbound	o2	IrvVCo	GWTC	505,394,966	1,326,503,082	1,553,367,942	286,792,300	740,082,207	1,942,483,399	2,274,696,133	419,968,332
70	Inbound	i1	TusSta	GWTC	194,683,076	674,440,406	714,461,009	159,169,318	-	-	-	-
70	Inbound	i2	TusSta	WarPCH	236,029,543	901,305,191	827,909,953	314,952,398	303,754,895	1,142,813,864	1,062,891,941	390,468,002
70	Outbound	o1	GWTC	TusSta	177,052,318	604,849,495	651,751,321	134,093,547	-	-	-	-

70	Outbound	o2	WarPCH	TusSta	218,985,566	830,259,681	768,708,394	285,502,008	300,961,995	1,138,461,463	1,056,120,570	390,066,814
70a	Inbound	i1	TusSta	EdHarW	-	-	-	-	84,362,544	266,308,933	316,929,228	36,180,197
70a	Outbound	o1	HaEdiS	TusSta	-	-	-	-	84,488,358	269,845,439	320,268,398	36,487,451
71	Inbound	i1	CoNutS	SuPlaN	-	-	-	-	337,396,914	1,396,726,708	1,042,433,514	720,521,959
71	Inbound	i1	RoYoLS	SuPlaN	220,946,130	983,077,888	690,982,515	526,559,402	-	-	-	-
71	Outbound	o1	SuPlaN	CoNutS	-	-	-	-	339,264,644	1,407,391,870	1,047,863,623	729,323,973
71	Outbound	o1	SuPlaN	RoYoLS	209,315,760	942,167,659	657,183,114	507,316,423	-	-	-	-
72	Inbound	i1	WarPCH	TusLeg	181,649,673	747,187,660	622,857,416	312,963,015	-	-	-	-
72	Inbound	i1	WarPCH	TusSta	-	-	-	-	223,218,512	933,803,613	777,502,946	387,698,682
72	Outbound	o1	TusLeg	WarPCH	185,235,222	749,399,426	620,991,587	320,467,068	-	-	-	-
72	Outbound	o1	TusSta	WarPCH	-	-	-	-	222,712,417	926,331,284	772,867,045	384,341,880
76	Inbound	i1	TaBeaW	DuMicE	46,891,535	201,758,571	161,028,768	89,241,154	46,891,535	201,758,571	161,028,768	89,241,154
76	Outbound	o1	DuMicE	TaBeaW	37,875,872	177,328,361	138,217,079	78,390,859	37,875,872	177,328,361	138,217,079	78,390,859
79	Inbound	i2	LarSqu	NPTC	63,767,754	287,755,483	196,646,687	170,285,731	182,332,930	823,497,803	561,923,992	487,922,201
79	Inbound	i1	NPTC	LarSqu	61,433,436	267,222,283	192,377,505	151,679,660	-	-	-	-
79	Outbound	o1	LarSqu	NPTC	58,367,178	254,570,813	182,823,093	144,714,912	-	-	-	-
79	Outbound	o2	NPTC	LarSqu	58,684,616	264,090,691	180,830,440	156,157,396	183,045,439	824,520,238	563,640,903	488,206,158
82	Inbound	i2	PTADPS	TCAItS	11,799,397	143,050,233	63,188,321	91,754,085	-	-	-	-
82	Inbound	i1	TCAItS	PTADPS	12,814,735	153,913,874	67,961,701	98,862,661	-	-	-	-
83	Inbound	i1	FPNR	LHTC	-	-	-	-	750,162,239	2,019,341,938	2,171,764,091	666,238,693
83	Inbound	i1	MaHarW	LHTC	1,058,458,458	2,766,904,349	2,942,512,550	996,670,349	-	-	-	-
83	Outbound	o1	LHTC	FPNR	-	-	-	-	754,053,233	2,025,537,707	2,164,943,370	677,333,964
83	Outbound	o1	LHTC	MaHarW	625,714,361	1,605,675,728	1,715,362,691	574,343,445	-	-	-	-
83	Outbound	o2	MaHarW	SASanE	1,342,291	2,258,634	3,231,535	595,828	-	-	-	-
83	Outbound	o3	SASanE	LHTC	3,655,395	12,617,784	11,371,291	5,016,718	-	-	-	-
83	Outbound	o4	SASanW	MaHarW	5,343,600	9,419,860	12,850,437	2,630,840	-	-	-	-
85	Inbound	i1	NiCrVN	LAMuRN	21,065,282	213,401,128	75,651,692	159,639,876	22,469,634	227,627,871	80,695,139	170,282,535
85	Outbound	o1	LAMuRN	NiCrVN	23,493,538	235,654,483	83,614,681	176,463,172	22,111,565	221,792,455	78,696,170	166,082,986
86	Inbound	i1	MaPIA	IrvSta	-	-	-	-	-	-	-	-
86	Inbound	i1	SuBriW	MurCtr	51,337	41,358	209,683,568	192,970,938	68,854,759	417,519,478	248,412,693	239,417,757
86	Outbound	o1	IrvSta	MaPIA	-	-	-	-	-	-	-	-
86	Outbound	o1	MurCtr	SuBriW	53,553,701	324,737,371	193,209,872	186,213,810	67,110,589	365,411,186	240,673,841	193,015,695
87	Inbound	i1	NiCrVN	EmAveN	27,569,185	217,133,321	98,055,061	148,308,838	-	-	-	-
87	Inbound	i1	NiCrVN	LHTC	-	-	-	-	21,136,128	136,637,448	67,250,646	91,599,224
87	Outbound	o1	EmAveN	NiCrVN	27,936,136	221,533,781	99,504,393	151,648,553	-	-	-	-
87	Outbound	o1	LHTC	NiCrVN	-	-	-	-	21,201,579	139,982,364	67,465,842	94,817,564
89	Inbound	i1	LAMuRN	LBBS	70,527,495	419,866,249	210,434,274	281,809,348	-	-	-	-
89	Inbound	i1	SMAnto	LBBS	-	-	-	-	88,962,620	634,879,584	304,018,740	421,878,233
89	Outbound	o1	LBBS	LAMuRN	70,173,498	427,685,392	212,342,361	287,322,713	-	-	-	-
89	Outbound	o1	LBBS	SMAnto	-	-	-	-	88,646,227	629,065,848	302,106,930	417,654,774
90	Inbound	i1	TusSta	GLDPHN	94,306,115	610,334,200	303,192,637	402,811,756	135,475,416	815,398,154	414,933,368	538,517,114
90	Outbound	o1	GLDPHN	TusSta	92,900,372	604,542,453	301,322,006	397,497,901	132,854,277	804,834,164	410,571,200	529,699,150
91	Inbound	i1	LHTC	LMPicS	114,994,472	633,914,532	315,627,199	437,926,707	123,289,479	679,641,296	338,394,637	469,516,094

91	Outbound	o1	LMPicS	LHTC	116,906,860	640,999,466	318,435,241	444,109,756	126,043,363	691,094,843	343,321,585	478,817,813
123	Inbound	i1	ACynML	GWTC	107,659,837	508,443,722	404,289,099	219,249,290	-	-	-	-
123	Inbound	i2	BPMS	GWTC	4,011,795	21,003,735	15,892,596	9,177,977	-	-	-	-
123	Inbound	i2	FPNR	GWTC	-	-	-	-	-	-	-	-
123	Outbound	o1	ACynML	BPMS	3,741,815	14,486,356	12,824,854	5,849,856	-	-	-	-
123	Outbound	o2	BPMS	ACynML	3,700,295	14,441,241	12,739,918	5,845,522	-	-	-	-
123	Outbound	o3	GWTC	ACynML	115,669,890	545,557,490	433,595,193	235,540,657	-	-	-	-
123	Outbound	o3	GWTC	FPNR	-	-	-	-	-	-	-	-
123	Inbound	i4	NuComE	GWTC	-	-	-	-	126,815,809	608,252,128	472,800,615	272,116,656
123	Outbound	o4	GWTC	NuComE	-	-	-	-	124,882,143	605,040,021	467,048,351	272,730,382
129	Inbound	i1	BPMS	BrMalS	-	-	-	-	151,109,468	579,198,627	549,188,745	185,650,022
129	Inbound	i1	BchLaH	LPKraW	83,163,202	462,694,371	362,500,984	186,791,880	-	-	-	-
129	Outbound	o1	BrMalS	BPMS	-	-	-	-	151,302,080	581,357,936	550,505,936	186,678,861
129	Outbound	o2	BrMalS	BchLaH	537,616	2,359,326	2,076,802	843,214	-	-	-	-
129	Outbound	o1	KrCorN	BchLaH	70,431,817	380,812,680	300,149,734	153,940,483	-	-	-	-
143	Inbound	i1	BrMalS	BchLaH	-	-	-	-	-	-	-	-
143	Inbound	i1	BrMILZ	BchLaH	73,935,994	341,668,622	275,682,078	146,273,968	112,060,487	517,847,268	417,835,300	221,698,949
143	Outbound	o1	BchLaH	BrMalS	-	-	-	-	-	-	-	-
143	Outbound	o1	BchLaH	BrMILZ	68,666,411	320,777,800	255,325,943	140,275,306	107,315,137	501,326,821	399,035,542	219,228,927
150	Inbound	i1	SuBriW	SuBriW	175,213,876	401,770,135	532,242,608	59,116,091	221,937,575	508,908,837	674,173,969	74,880,381
150	Outbound	o1	SuPaCE	SuPaCE	175,379,222	402,498,984	532,943,583	59,316,505	222,147,013	509,832,045	675,061,870	75,134,239
153	Inbound	i1	ARTIC	BrMILZ	96,189,049	298,430,796	291,092,021	112,148,875	-	-	-	-
153	Outbound	o1	BrMILZ	ARTIC	96,625,310	299,868,559	292,436,648	112,680,633	-	-	-	-
164	Inbound	i1	ICAlts	TusSta	-	-	-	-	-	-	-	-
164	Outbound	o1	TusSta	ICAlts	-	-	-	-	-	-	-	-
167	Inbound	i1	MarVil	CaMeaN	97,906,040	471,961,434	327,175,560	256,155,940	104,433,111	503,425,532	348,987,267	273,233,004
167	Outbound	o1	CaMeaN	MarVil	98,992,951	480,736,053	331,656,298	261,153,800	105,592,483	512,785,126	353,766,722	278,564,055
167a	Inbound	i1	MarVil	LarSqu	-	-	-	-	-	-	-	-
167a	Outbound	o1	LarSqu	MarVil	-	-	-	-	-	-	-	-
177	Inbound	i1	LHTC	TCAIts	40,485,956	233,786,311	129,667,742	145,891,367	-	-	-	-
177	Outbound	o1	TCAIts	LHTC	39,072,296	228,610,475	129,460,283	139,565,740	-	-	-	-
177	Inbound	i2	LHTC	MRLoAW	-	-	-	-	44,100,082	311,314,797	165,062,111	192,303,435
177	Outbound	o2	MRLoAW	LHTC	-	-	-	-	44,426,731	313,639,262	166,175,783	193,837,638
178	Inbound	i1	YoGoWW	UnCenE	52,424,558	252,889,070	126,438,569	188,475,479	78,636,837	379,333,607	189,657,853	282,713,221
178	Outbound	o1	UnCenE	YoGoWW	55,506,627	246,388,481	128,734,213	183,259,451	83,259,939	369,582,724	193,101,319	274,889,179
400	Inbound	i1	JWA	TusSta	13,173,482	51,410,792	38,539,623	26,133,077	13,173,482	51,410,792	38,539,623	26,133,077
400	Outbound	o1	TusSta	JWA	13,862,106	51,450,257	39,134,295	26,267,435	13,862,106	51,450,256	39,134,295	26,267,434
401	Inbound	i1	TusSta	BusCen	26,970,000	88,056,408	70,020,239	45,179,786	26,970,000	88,056,407	70,020,239	45,179,785
401	Outbound	o1	BusCen	TusSta	22,371,894	74,016,180	58,625,823	37,908,160	22,371,894	74,016,179	58,625,822	37,908,160
403	Inbound	i1	SCWatS	IrvSta	12,392,955	61,726,601	40,439,263	34,129,574	12,392,955	61,726,602	40,439,264	34,129,575
403	Inbound	i2	SCWatS	IrvSta	425,354	1,893,469	1,262,613	1,075,744	425,354	1,893,469	1,262,613	1,075,744
403	Outbound	o1	IrvSta	SCWatN	11,446,804	56,526,674	37,009,196	31,377,443	11,446,804	56,526,675	37,009,196	31,377,444
405	Inbound	i1	TusSta	TusSta	9,484,736	42,626,428	33,377,147	18,734,020	9,484,736	42,626,427	33,377,146	18,734,020

453	Inbound	i1	OTC	LVPepW	8,448,105	27,712,456	22,483,547	14,190,083	8,448,105	27,712,457	22,483,548	14,190,083
453	Outbound	o1	MaLaVS	OTC	8,447,021	27,696,118	22,474,645	14,181,543	8,447,021	27,696,119	22,474,646	14,181,543
463	Inbound	i1	SCPLZ	SARTC	29,604,449	72,000,039	84,530,156	17,759,148	-	-	-	-
463	Outbound	o1	SARTC	BrAntN	33,826,466	77,947,066	94,427,064	18,136,695	-	-	-	-
472	Inbound	i1	FDABld	TusSta	6,138,615	24,367,181	19,101,935	11,672,000	6,138,615	24,367,181	19,101,934	11,672,000
472	Outbound	o1	TusSta	FDABld	6,438,070	25,343,124	20,029,487	12,468,960	6,438,069	25,343,124	20,029,486	12,468,960
473	Inbound	i1	TusSta	UnCenW	22,449,708	57,643,386	52,883,349	31,367,843	22,449,708	57,643,385	52,883,349	31,367,843
473	Outbound	o1	UnCenE	TusSta	19,324,746	49,770,741	45,621,266	27,062,494	19,324,746	49,770,741	45,621,266	27,062,494
480	Inbound	i1	LFRegS	IrvSta	1,725,336	12,495,019	6,887,464	7,433,408	1,725,336	12,495,020	6,887,464	7,433,408
480	Outbound	o1	IrvSta	LFRegN	2,922,929	21,071,221	11,621,408	12,541,067	2,922,929	21,071,221	11,621,408	12,541,067
529	Inbound	o1	GWTC	FPNR	-	-	-	-	206,171,663	505,732,126	577,685,628	141,237,457
529	Outbound	i1	FPNR	GWTC	-	-	-	-	199,265,976	481,326,423	552,037,119	135,506,324
543	Inbound	i1	HaMcAN	FTC	442,176,088	998,489,411	1,253,682,207	205,545,773	406,847,584	918,713,199	1,153,516,878	189,123,302
543	Outbound	o1	FTC	MrHarW	442,164,791	999,137,812	1,253,589,549	206,221,272	406,837,188	919,309,793	1,153,431,618	189,744,832
553	Inbound	i1	ARTIC	BrMcAr					304,233,646	751,562,913	893,380,966	168,893,258
553	Outbound	o1	BrMcAr	ARTIC					296,581,011	696,617,758	848,455,578	150,659,794
560	Inbound	i1	7ChanI	SARTC	369,095,235	816,073,499	986,840,635	209,384,207	-	-	-	-
560	Inbound	i1	WeGoWE	SARTC	-	-	-	-	452,469,281	860,702,226	1,187,684,287	137,768,881
560	Outbound	o1	SARTC	7ChanI	364,790,948	818,525,378	979,303,388	215,115,109	-	-	-	-
560	Outbound	o1	SARTC	WeGoWE	-	-	-	-	455,259,903	866,735,602	1,191,581,863	142,996,368
862	Inbound	i1	SARTC	SARTC	428,577,288	516,534,229	930,391,803	80,784,605	428,577,294	516,534,237	930,391,819	80,784,605

OCTA
Limited English Proficiency Plan

**Orange County Transportation Authority
Limited English Proficiency Plan**

**Prepared for the Federal Transit Administration
In accordance with Circular 4702.1B
Executive Order 13166**

Board of Directors Approved: October 23, 2023



Updated October 2023

ORANGE COUNTY TRANSPORTATION AUTHORITY
Limited English Proficiency Plan
Language Assistance Plan
October 2023

The *Orange County Transportation Authority (OCTA) Limited English Proficiency Plan (LEP) and Language Assistance Plan* has been prepared to address OCTA's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency. As defined in Executive Order 13166, individuals who have a limited ability to read, write, speak, or understand English are limited English proficient or "LEP." Under Executive Order 13166, OCTA is federally mandated to take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of its programs and activities to individuals who identify as LEP. OCTA utilized the United States (U.S.) Department of Transportation's (DOT) LEP Guidance Handbook and performed a Four Factor Analysis to develop the OCTA LEP Plan.

The DOT maintains that public transit agencies can retain LEP ridership even after they become proficient in English if his/her experience with public transportation is positive. Additionally, the Federal Transit Administration (FTA) has determined that conducting an LEP needs assessment based on a Four Factor Analysis ensures that a transit agency can know and understand the LEP population in its service area and be in a better position to implement a cost-effective mix of language assistance measures that target resources appropriately.

Four Factor Analysis

The DOT Four Factor Analysis provides guidance to transit agencies receiving federal financial assistance in taking reasonable steps to ensure meaningful access to all its services, programs, and activities utilized by LEP persons. The DOT guidance states transit agencies will provide written translation of vital documents for each eligible LEP language group that meets the Department of Justice (DOJ) Safe Harbor provision of five percent of the population or 1,000 persons, whichever is less, identified as a LEP speaker within the service area. Examples of vital documents include notice of rights, complaint procedures and forms, and Americans with Disabilities Act (ADA) paratransit eligibility forms and information. Such practices will be considered strong evidence of compliance with the recipient's written translation obligations for the Safe Harbor provision.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by an OCTA service, program, or activity;

Factor 2: The frequency with which LEP individuals come in contact with the program, service, or activity;

Factor 3: The nature and importance of OCTA services, programs, or activities provided to LEP individuals;

Factor 4: The resources available to OCTA and the costs.

FACTOR ONE - The number or proportion of LEP persons eligible to be served or likely to be encountered by an OCTA service, program, or activity.

OCTA defines an LEP person as those individuals limited by the ability to speak English less than "very well" as reported by the U.S Census Bureau. The following tables were utilized to determine the number of LEP persons eligible to be served, or likely to be encountered, by an OCTA service, program, or activity.

External Data Sources - U.S. Census Bureau

Table 1 represents the racial breakdown of Orange County according to the U.S Census Bureau, 2021 American Community Survey (ACS). The results shown are a combination of the Demographic and Housing Estimates (DP05) and Hispanic or Latino Origin by Race (B03002). Responses for Hispanic or Latino ethnicity were recategorized by race to better align with existing survey results.

Table 1: Orange County Racial Breakdown

Race / Ethnicity	Population Estimate ¹	Population Percentages
White	1,191,185	37.6%
Hispanic or Latino (of any race)	1,080,593	34.1%
Asian	693,396	21.9%
Two or more races	125,736	4.0%
Black or African American	52,572	1.7%
Some other race	13,003	0.4%
Native Hawaiian and Other Pacific Islander	7,709	0.2%
American Indian and Alaska Native	3,615	0.1%
Total	3,167,809	100.0%

¹ DP05 ACS Demographic and Housing Estimates / B03002 Hispanic or Latino Origin by Race
Source: U.S. Census Bureau, 2021 ACS One-Year Estimate [Latest Estimate Available]

Table 2 represents the number of LEP speakers by language in Orange County who meet the Department of Justice (DOJ) Safe Harbor provision of "every 1,000 speakers or five percent of the population whichever is less."

Table 2: Orange County Number of LEP Speakers for DOJ Safe Harbor Provision

Language Spoken at Home	Population Estimate	Speaks English less than "Very Well"	
		Count	%
Speak only English	1,622,013	-	-
Spanish	735,651	266,568	8.90%
Vietnamese	185,368	114,547	3.82%
Chinese (incl. Mandarin, Cantonese)	96,610	47,396	1.58%
Korean	75,904	41,185	1.38%
Tagalog (incl. Filipino)	46,988	12,706	0.42%

Language Spoken at Home	Population Estimate	Speaks English less than "Very Well"	
		Count	%
Persian (incl. Farsi, Dari)	32,087	10,171	0.34%
Arabic	31,976	10,021	0.33%
Japanese	14,419	6,082	0.20%
Hindi	12,605	1,446	0.05%
Other Indo-European languages	11,799	3,711	0.12%
Russian	10,726	4,159	0.14%
Ilocano, Samoan, Hawaiian, or other Austronesian languages	10,234	3,577	0.12%
Gujarati	8,968	2,771	0.09%
Urdu	8,782	1,581	0.05%
German	7,775	1,070	0.04%
Thai, Lao, or other Tai-Kadai languages	7,033	4,230	0.14%
Portuguese	5,638	1,660	0.06%
Khmer	5,214	2,539	0.08%
Other languages of Asia	4,046	1,628	0.05%
Ukrainian or other Slavic languages	3,971	1,291	0.04%
Punjabi	3,837	1,456	0.05%
French (incl. Cajun)	9,926	846	0.03%
Telugu	5,079	598	0.02%
Italian	4,913	733	0.02%
Nepali, Marathi, or other Indic languages	3,967	408	0.01%
Hebrew	3,402	668	0.02%
Yiddish, Pennsylvania Dutch or other West Germanic languages	3,117	205	0.01%
Tamil	2,933	136	0.00%
Polish	2,843	527	0.02%
Amharic, Somali, or other Afro-Asiatic languages	2,365	751	0.03%
Swahili or other languages of Central, Eastern, and Southern Africa	2,184	922	0.03%
Armenian	2,178	694	0.02%
Malayalam, Kannada, or other Dravidian languages	1,912	47	0.00%
Other and unspecified languages	1,854	438	0.01%
Greek	1,581	118	0.00%
Bengali	1,447	272	0.01%
Yoruba, Twi, Igbo, or other languages of Western Africa	1,148	158	0.01%
Hmong	1,096	358	0.01%
Serbo-Croatian	742	179	0.01%
Haitian	410	27	0.00%
Other Native languages of North America	312	-	0.00%
Navajo	-	-	0.00%

1 B16001 Language spoken at home by ability to speak English for the population 5 years and over.
Source: U.S. Census Bureau, 2021 ACS 1-Year Estimates

Based on the 2021 ACS One-Year Estimates, Spanish is the only language that meets the DOJ Safe Harbor threshold of five percent of the population that speaks English less than "very well". An additional 20 languages meet the 1,000 speaker threshold criteria of the LEP population that speaks English less than "very well" in Orange County. Some of the ACS language results also include groups of languages that collectively include more than 1,000 speakers in Orange County. The 20 languages identified as the 1,000 LEP speaker threshold are as follows (in order of frequency): Vietnamese, Chinese, Korean, Tagalog, Persian, Arabic, Japanese, Hindi, other Indo-European languages, Russian, Ilocano/Samoan/Hawaiian/or other Austronesian languages, Gujarati, Urdu, German, Thai/Lao/or other Tai-Kadai languages, Portuguese, Khmer, other languages of Asia, Ukrainian or other Slavic languages, and Punjabi.

Table 3 represents a five-year comparison of the English learners by number and percentage with reference to the primary language spoken by English learners in Orange County public schools.

Table 3: Orange County Public School Enrollment/Percentage of LEP Learners by Language

Languages of English Learners by Number and Percentage					
Language	2017-18	2018-19	2019-20	2020-21	2021-22
All Other	7,807	7,567	7,388	6,293	6,665
	1.6%	1.6%	1.6%	1.4%	1.5%
Arabic	2,314	2,207	2,153	1,944	2,038
	0.5%	0.5%	0.5%	0.4%	0.5%
Korean	2,961	2,987	2,934	2,414	2,652
	0.6%	0.6%	0.6%	0.5%	0.6%
Mandarin (Putonghua)	3,141	3,179	3,172	2,458	2,498
	0.6%	0.7%	0.7%	0.5%	0.6%
Spanish	88,623	81,124	78,291	71,855	74,195
	18.2%	16.9%	16.5%	15.7%	16.5%
Vietnamese	9,092	8,377	8,203	7,801	7,871
	1.9%	1.7%	1.7%	1.7%	1.8%
Total Languages of English Learners	113,938	105,441	102,141	92,765	95,919

Source: "Languages of English Learners" from <http://www.ed-data.org/county/Orange>. A total of 2,555,951 California public school students (English Learners and Fluent English Proficient) speak a language other than English in their homes. This number represents about 42.8 percent of the state's public-school enrollment. This table displays the number of students speaking each of the top five non-English languages in Orange County, California. The percentages in the table refer to the percent of all students in the County who speak each language. The "All Other" category encompasses all languages spoken that are not included in a grade-by-grade list of the more than 65 languages reported by California schools.

Table 4 represents the languages and vital documents the County of Orange translates for the County's Health Care Agency's Medi-Cal Mental Health Services program. Various vital documents are translated in Arabic, Chinese, Farsi, Korean, Spanish and Vietnamese, which aligns with the top six language support requests OCTA receives as can be seen in **Table 5**.

Table 4: County of Orange Medi-Cal Translated Vital Documents Available by Language

Title	Arabic	Chinese	English	Farsi	Korean	Spanish	Vietnamese
Advance Health Care Directives (F346-705)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Grievance or Appeal Form (F346-706)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Grievance & Appeal Process Posters	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Grievance Fact Sheet MHP	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Authorization to Use and Disclose Protected Health Information (F346-531B)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Consent to Record (F346-474)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Mental Health Plan Intake/Advisement Checklist (F346-753)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Psychiatric Medication Consent (F346-7921)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Informed Consent for Services - General (F346-301)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Informed Consent for Telehealth and Telephonic Services	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Telehealth Email Acknowledgement Form	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Notice of Adverse Benefit Determination-Delivery System	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Notice of Adverse Benefit Determination- Modification Notice	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Notice of Adverse Benefit Determination- Termination Notice	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
NOABD Beneficiary Non--Discrimination Notice	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Notice of Adverse Benefit Determination- Your Rights Notice	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Language tagline	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AQIS Continuity of Care Request Form	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
National Voter Registration Act (NVRA) Preference Forms	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
National Voter Registration FAQs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Source: <https://www.ochealthinfo.com/about-hca/behavioral-health-services/mental-health-information/bhs-medi-cal-provider-information>

Internal Data Source

During the period of March 1, 2018, through March 31, 2023, the OCTA Customer Information Center (a phone call center handling customer information and customer relations calls) received 457 requests for language interpretation and assistance in a language other than English. OCTA provides interpretation support using a “Language Line” that provides support upon request. The cumulative requests for assistance in each language were as follows:

Table 5: Language Line Support Requests

Language	Number of Requests
Arabic	11
Cantonese	2
Egyptian Arabic	10
Farsi (Persian)	18
Filipino	1
Gujarati	1
Hindi	8
Japanese	2
Korean	22
Mandarin	57
Persian	2
Pohnpeian	1
Romanian	2
Russian	5
Spanish	1
Tagalog	1
Taiwanese	1
Vietnamese	312
Total	457

Note that OCTA's Customer Information Center is regularly staffed with English and Spanish speakers, resulting in a low report of Spanish language line requests. From July 2021 to March 2023, OCTA received more than 49,000 Spanish language calls, representing approximately 11 percent of calls to the Customer Information Center. On an annual basis, approximately 28,000 calls for customer information or customer relations are handled by Spanish speaking Customer Information Center staff in addition to any interpretation support requested using "Language Line" resources.

Factor One Summary

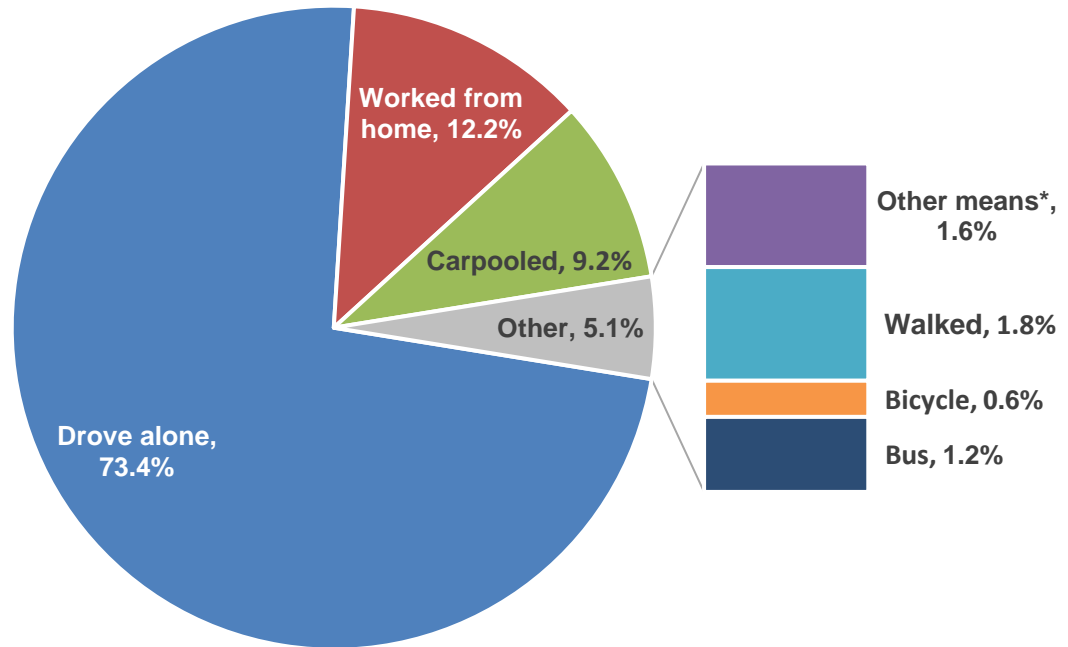
- As of the 2021 American Community Survey, the overall population of Orange County has decreased by 0.57 percent from 2018.
- There are 20 languages that do not meet the required threshold of five percent of the population but have more than 1,000 LEP individuals, and therefore meet the Safe Harbor threshold in Orange County.
- Since the 2018 LEP report, five additional languages have been added based on the 1,000 LEP provision. Those additional languages include other Indo-European languages, Urdu, Portuguese, other languages of Asia, Ukrainian or other Slavic languages.
- French is the only language that was previously included under the DOJ Safe Harbor provision, but no longer meets the required threshold of five percent of the population or the 1,000 LEP speaker provision in Orange County.
- The overall number of LEP student enrollments for the past five years has declined in Orange County, including the top five non-English languages.
- The County of Orange has identified vital document translation in Arabic, Farsi, Chinese, Korean, Spanish, and Vietnamese for the County's Medi-Cal mental health services.
- The most common language request other than English, based on Customer Information Center calls, was Spanish. The language with the highest request for verbal interpretation services at OCTA was Vietnamese.

FACTOR TWO - The frequency with which LEP individuals come in contact with the program, service, or activity.

Chart 1 depicts the means of transportation to work for those 16 years of age and over in Orange County. Approximately 48 percent of Orange County's overall population is included in this working age estimate.

Chart 1: Workers 16 Years of Age and Over in Orange County by Means of Transportation to Work

Means of Transportation to Work in Orange County, CA



*"Other means" category on graph includes other means selection, along with responses of 0.2% or less, including: rail; long-distance train or commuter rail; light rail, streetcar or trolley; ferryboat; motorcycle; and taxicab.

B08006 Means of transportation to work
Source: U.S. Census Bureau, 2021 ACS Five-Year Estimates

Means of transportation to work:

- Drove alone: 1,147,600 (73.4 percent)
- Carpooled: 143,999 (9.2 percent)
- Worked from home: 191,060 (12.2 percent)
- Walked: 27,616 (1.8 percent)
- **Bus: 18,224 (1.2 percent)**
- Bicycle: 8,790 (0.6 percent)
- Taxicab, motorcycle, or other means: 20,218 (1.3 percent)
- Subway or elevated rail: 1,003 (0.1 percent)
- Long-distance train or commuter rail: 3,544 (0.2 percent)
- Light rail, streetcar or trolley: 264 (< 0.1 percent)
- Ferryboat: 136 (< 0.1 percent)

An estimated 1.2 percent of Orange County workers commute using the bus. This is a decrease from the 1.7 percent reported in the 2018 LEP. Note that this work criteria may exclude other trip purposes, including travel to school. OCTA has established a low-cost community college bus pass program in place since August 2017. In August 2021, OCTA introduced a free youth pass for children ages six to 18, available by parental request.

Note that analysis in this section uses five-year estimates from the 2021 ACS in order to use the geographic details (Zip Code Tabulation Area level data) only available in this dataset. Review of the more recent one-year 2021 ACS showed significant increases in the percentage of individuals

working from home. The “worked from home” selection increased significantly in 2021 from previously reported figures in 2019, from 6.4 percent of responses in 2019 to 22 percent of responses in 2021. This increase in the work-from-home response, likely due to post-pandemic impacts, has decreased the effective percentages of other responses.

Table 5 shows the U.S. Census Bureau's 2021 ACS Five-Year Population Estimates for Orange County and Means of Transportation to Work by Public Transit (Bus). Overall, for the County, approximately 18,224 individuals are estimated to take the bus to work as a means of transportation based on ACS estimates.

The table also identifies the estimated number of LEP individuals who speak English less than "very well" for Orange County. A detailed table by source language and Orange County ZIP code is provided in Appendix 1.

To generate an estimate of the number of LEP individuals using the bus for transportation to work, the reported LEP population count for each ZCTA was multiplied by percentage of the overall population using the bus. Based on this estimate, approximately 16 percent of the individuals that take the bus to work are Spanish speakers that speak English “less than very well.” An additional five percent of riders are Vietnamese speakers that speak English “less than very well.” Overall, it is estimated that approximately 4,393 LEP riders use the bus.

Table 5: U.S. Census Bureau, 2021 ACS 5-Year Estimate for Orange County Population, Means of Transportation to Work by Bus and LEP Population

	2021 Population [1]	Means of Transportation to Work by Bus [2]	Number of LEP Population [3]	Potential Number of LEP Riders
Orange County, California	3,167,809	18,224	557,104	4,393

[1] B01001 Source: U.S. Census Bureau, 2021 ACS 5-Year Population Estimate: Sex by Age for Orange County, CA
 [2] B08006 Source: U.S. Census Bureau, 2021 ACS 5-Year Estimates: Sex of Workers by Means of Transportation to Work (Public transportation (excluding taxicab): Bus)
 [3] C16001 Source: U.S. Census Bureau, 2021 ACS 5-Year Population Estimates: Language Spoken at Home, Who Speak English "Less than Very Well"

2020 Transportation Needs Assessment (TNA) Rider Survey Results

The 2020 TNA Rider Survey was the most recent customer survey conducted by OCTA to assess the transportation needs of all residents, gaps in service, barriers to transit use, and feedback on transit and active transportation. The survey instrument was produced in seven languages: Arabic, Chinese (Mandarin), English, Farsi, Korean, Spanish, and Vietnamese. Due to the impact of the coronavirus (COVID-19), 6,941 valid responses were collected, which translates to 58 percent of the original sample target.

The TNA survey effort included both onboard intercept surveys of OC Bus riders, as well as more general community outreach surveys. Community outreach efforts included ethnic and cultural events within Orange County, including the Tet Festival, Black History Month, and other events.

Initially, the onboard intercept survey target was 12,000 surveys, with collection starting in late January 2020. Unfortunately, the survey collection efforts had to be paused in March 2020 due to the COVID-19 pandemic. However, the survey results collected still reflect a wide-spread surveying effort across the OC Bus system and are indicative of the overall population. The results shown reflect the more than 6,900 responses collected from OC Bus riders.

Table 6 represents the percentage of respondents by ethnicity who use OCTA buses instead of other means of transportation according to the 2020 TNA Survey.

Table 6: Ethnicity of Survey Respondents General Purpose Bus Usage

Ethnicity	Hispanic/Latino	White	Asian	Decline to state	Black/African American	Vietnamese	Native American/ Alaska Native	Native Hawaiian/ Pacific Islander	Other	Filipino	Middle Eastern/ North African	Chinese	Korean	Indian	Japanese
No driver license	27%	27%	28%	21%	24%	31%	25%	26%	23%	27%	30%	19%	26%	24%	44%
I can't drive	28%	14%	20%	25%	18%	19%	24%	20%	11%	27%	15%	19%	23%	22%	22%
Can't afford to purchase or maintain a personal vehicle	12%	16%	8%	10%	16%	9%	12%	12%	15%	9%	13%	5%	6%	5%	0%
I save money by riding the bus	8%	12%	16%	9%	12%	15%	11%	13%	11%	23%	9%	16%	17%	17%	10%
My personal vehicle isn't working properly	4%	6%	2%	5%	7%	2%	4%	8%	6%	1%	1%	4%	6%	0%	2%
High gas prices	4%	4%	5%	5%	5%	3%	3%	2%	6%	1%	5%	12%	6%	2%	2%
Prefer not to drive	3%	5%	4%	5%	3%	6%	1%	3%	3%	3%	9%	5%	4%	0%	5%
Avoid traffic congestion	3%	4%	5%	6%	5%	4%	4%	7%	5%	5%	8%	4%	6%	5%	2%
Enjoy riding the bus	4%	2%	3%	4%	3%	4%	4%	4%	6%	2%	4%	2%	2%	5%	0%
Better for the environment	3%	4%	2%	3%	2%	3%	4%	4%	1%	1%	1%	2%	0%	7%	0%
Other	2%	3%	3%	2%	3%	1%	3%	3%	8%	0%	1%	5%	2%	7%	10%
No Response	1%	1%	2%	5%	1%	2%	1%	0%	2%	0%	1%	2%	0%	2%	0%
Better use of time	1%	1%	2%	2%	2%	1%	3%	0%	3%	0%	4%	5%	0%	2%	2%
Total Response Count by Column	3,881	1,285	758	731	412	162	136	112	110	88	80	57	47	41	41

2020 Transportations Needs Assessment Survey – Moore & Associates

Future survey efforts are planned, but due to COVID-19 related impacts, the 2020 TNA survey is the most representative transit-rider focused survey effort available.

- The survey suggests "high usage" riders. Nearly 75 percent of respondents indicated they typically ride OC Bus four to seven days per week. This suggests a high level of transit usage and customer satisfaction.
- The most frequent trip purpose was a work commute (42.6 percent), followed by either college (15 percent) or kindergarten to grade 12 school (12.4 percent).
- A total of 51 percent of survey participants reported greater use of OC Bus service in 2020 versus the year prior. An additional 36 percent indicated that they maintained the same level/frequency of usage. This suggests a dedicated customer base as well as transit service which is meeting customer travel needs.
- Nearly 50 percent of respondents indicated either "no driver's license" or "I can't drive" as the reason for using OC Bus. An additional 12 percent indicated they use the bus because they can't afford to purchase or maintain a personal vehicle. Cost was also a factor for some, with ten percent stating they save money by riding the bus and an additional four percent citing high gas prices as the main reason why they choose to ride the bus.

- Customers noted that they preferred to get information about OC Bus using Google Maps (32.4 percent), the OCTA website (24.6 percent) and the OC Bus mobile app (23.8 percent).

2014 Customer Satisfaction Survey Results

Due to the lack of comprehensive survey results from the 2020 Transportation Needs Assessment, results from the last complete customer satisfaction survey - in 2014 - will be used solely for comparison purposes. The 2014 Customer Satisfaction Survey was conducted to measure general bus usage. Respondents were very frequent users of OCTA bus service, with 82 percent using the bus four to seven days per week and another 15 percent using the bus one to three days per week. Respondents who were less frequent riders (less than four days per week) were more widely spread across the employment spectrum and included homemakers, students, and disabled residents. Respondents in the survey appeared to be long-term riders of OCTA buses with 62 percent having been riders for at least four years.

The dominant reasons why respondents indicated they ride OCTA's fixed-route bus service instead of another means of transportation centered on their inability to use a personal vehicle (car), either because it is too expensive to purchase and/or maintain a car (45 percent), they do not have a license/can't drive (19 percent), or their current vehicle is not working properly (nine percent). Cost was also a factor for some, with nine percent stating they save money by riding the bus and an additional five percent citing high gas prices as the main reason why they choose to ride the bus.

Table 7 represents the percentage of respondents by income and ethnicity who use OCTA buses instead of other means of transportation according to the 2014 Bus Customer Satisfaction Survey.

Table 7: Income/Ethnicity of Survey Respondents General Purpose Bus Usage

	Household Income (QD1 2)						Ethnicity (QD9)					
	Less than \$10K	\$10K to \$19K	\$20K to \$29K	\$30K to \$49K	\$50K to \$64K	\$65K or more	Cauc / White	Latino / Hispanic	Af Amer / Black	Amer Indian	Asian American	Other / Mixed
Can't afford to purchase, maintain a car	56%	46%	39%	32%	27%	26%	45%	46%	37%	34%	43%	33%
No driver's license, can't drive	18%	16%	24%	21%	18%	20%	18%	21%	15%	14%	21%	14%
I save money by riding the bus	5%	10%	7%	14%	20%	17%	9%	8%	11%	18%	12%	13%
My car isn't working properly	6%	9%	9%	13%	7%	9%	8%	7%	17%	6%	5%	14%
Prefer not to drive	3%	4%	5%	7%	7%	6%	5%	5%	4%	4%	4%	6%
High gas prices	3%	5%	8%	5%	9%	4%	5%	4%	7%	7%	4%	4%
Other reason	5%	4%	3%	3%	4%	7%	4%	4%	4%	6%	3%	7%
Enjoy riding the bus	3%	2%	2%	2%	3%	3%	2%	3%	3%	0%	3%	1%
Better for environment, air quality	1%	2%	1%	2%	3%	5%	2%	1%	1%	3%	3%	3%
Avoid traffic congestion	1%	1%	1%	1%	1%	2%	1%	1%	0%	2%	1%	5%
Better use of time	0%	1%	1%	0%	1%	1%	1%	0%	0%	5%	1%	0%

2014 Fixed-Route Bus Service Customer Satisfaction Survey – True North Research

Factor Two Summary

- Approximately 1.2 percent of Orange County's working age population uses a public transportation bus as a means of transportation to work.
- Approximately 18,224 individuals take the bus to work as a means of transportation. Of those individuals, about 4,393, or 24 percent, are estimated as individuals who speak English less than "very well" who can come in contact with OCTA fixed-route services.
- Of the approximate 24 percent of potential LEP passengers utilizing bus for means of transportation to work, approximately 16 percent speak Spanish, one percent speak Korean, one percent speak Chinese, five percent speak Vietnamese, 0.3 percent speak Arabic, and 2.1 percent speak other languages.

- The majority of survey respondents were identified as frequent riders using OC Bus from four to seven days a week for at least the last four years.
- Based on the 2020 TNA Rider Survey, nearly 50 percent of respondents indicated either "no driver's license" or "I can't drive" as the reason for using OC Bus.

FACTOR THREE

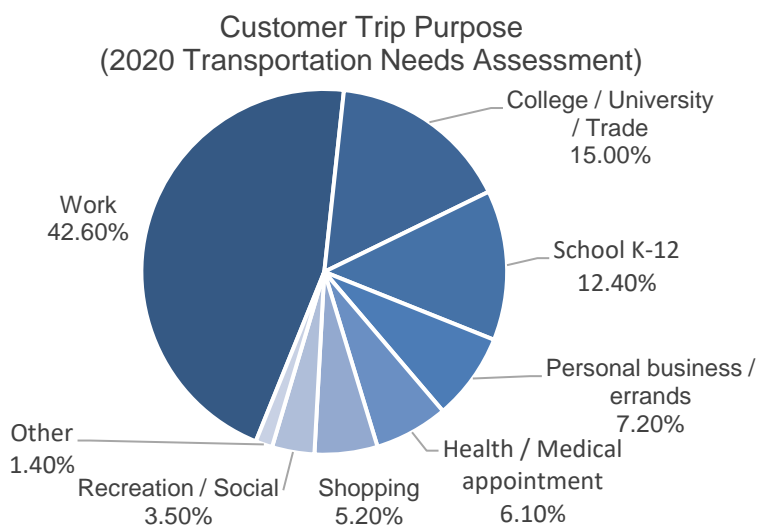
Factor 3: The nature or importance of OCTA services, programs, or activities provided to LEP individuals.

OCTA is the premier fixed-route bus system of Orange County, which currently operates 50 routes throughout the County (the number of active routes has been reduced by COVID-19-related impacts as of the update of this report). OCTA's fixed-route bus system is an integral part of the regional transportation system. OCTA delivers efficient transportation programs that reduce traffic congestion and improve mobility. As the premier provider of urban public transportation in the County of Orange, OCTA also provides an important paratransit program in addition to bus service between Metrolink stations, and connecting routes to Los Angeles, Riverside, and San Diego transit agencies.

2020 TNA Rider Survey Results

The 2020 TNA Rider Survey results indicated that the most frequent reason (42.6 percent) riders were taking the bus at the time he/she was being interviewed were riding for work-related purposes. Other purposes included going to college (15 percent), shopping (5.2 percent), running personal errands (7.2 percent), traveling to/from a health or medical appointment (6.1 percent), going to school (12.4 percent), attending a recreation/social event (3.5 percent), and other purposes (1.4 percent).

Chart 2: Survey Respondents General Purpose for Bus Usage



2014 Customer Satisfaction Survey Results

The 2014 Customer Satisfaction Survey results indicated that the most frequent reason (53 percent) riders were taking the bus at the time he/she was being interviewed were riding for work-related purposes. Other purposes included going to college (13 percent), shopping

(eight percent), running personal errands (eight percent), traveling to/from a health or medical appointment (seven percent), going to school (five percent), attending a recreation/social event (five percent), and other purposes (two percent).

Chart 3: Survey Respondents General Purpose for Bus Usage

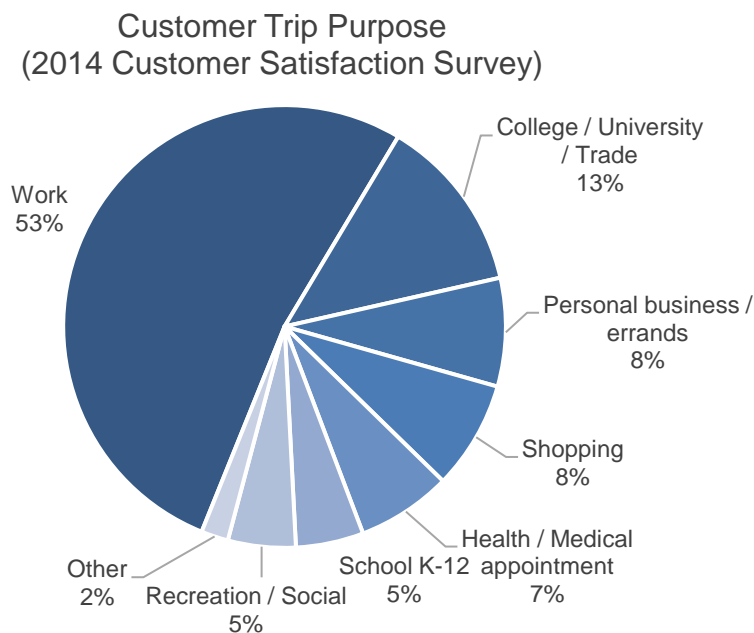
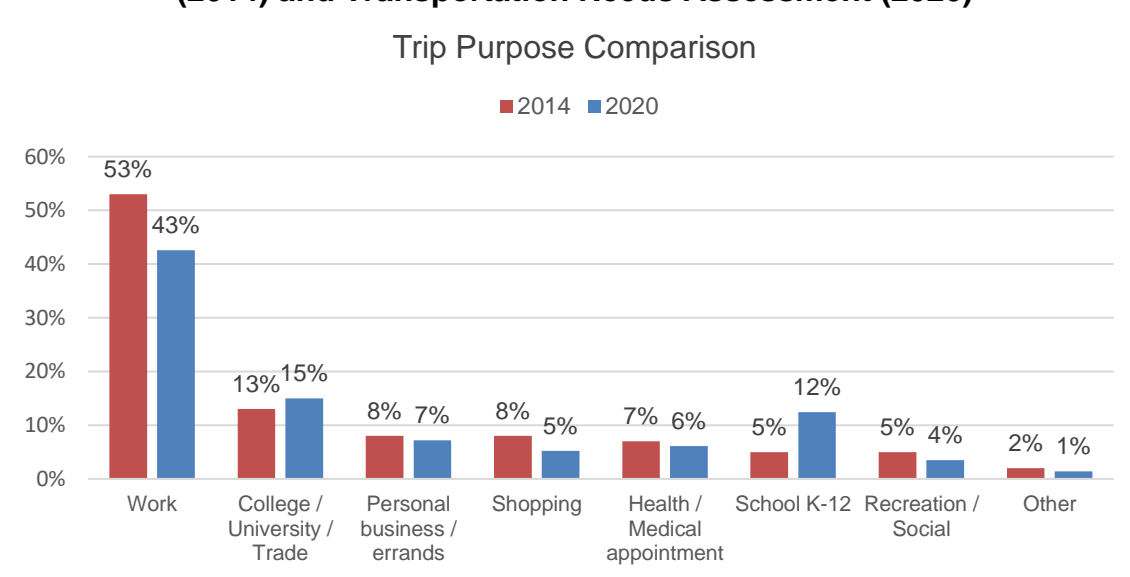


Table 8: Comparison of Trip Purpose Responses from Customer Satisfaction Survey (2014) and Transportation Needs Assessment (2020)



Factor Three Summary

- As the premier provider of public transportation in Orange County, members of the public rely on the fixed-route bus service as a means of transportation to work.

- Based on both the 2014 customer satisfaction and 2020 TNA surveys, the most common trip purposes were work/commute and school related. These two reasons coincide with the “frequency of use” data.

FACTOR FOUR

Factor 4: The resources available to OCTA and the costs.

2020 Transportation Needs Assessment Rider Survey Results

Despite the survey being available in seven languages, 78 percent were completed in English and 20 percent in Spanish. Of the other five language options, 1.6 percent were completed in Vietnamese. In terms of household languages, the top three languages spoken at home were English (73 percent), Spanish (52 percent) and Vietnamese (four percent).

With respect to rider preferred information access, the top three sources identified were OCTA website (25 percent), Bus Book (11 percent), and text message (ten percent). Respondents indicated some use of a mobile app, 32 percent utilize Google Maps, while 24 percent utilize OCTA’s mobile app and 16 percent Transit app.

According to the 2014 Customer Satisfaction Survey, approximately 79 percent of the passengers surveyed prefer to receive fixed-route bus information in English. The second highest language was Spanish at 18 percent.

Table 9 identifies by the language riders prefer to receive fixed-route bus information in.

Table 9: Language Preferred to Receive Bus Information

In what language would you prefer to receive bus information? <i>Check one.</i>		
1	English	79%
2	Spanish	18%
3	Vietnamese	1%
4	Chinese/Mandarin/Cantonese	1%
5	Korean	<1%
6	Tagalog	<1%
7	Farsi	<1%
8	Other	<1%

2014 Fixed-Route Bus Service Customer Satisfaction Survey – True North Research

The 2014 Customer Satisfaction Survey rated the OCTA Bus Book as the most effective source for information about OCTA bus service (68 percent very or somewhat effective). While the Bus Book is no longer printed, it is now available for free online, consistent with the 2020 TNA preferred online options. Other preferred methods based on the previous 2014 Customer Satisfaction Survey included Text4Next (56 percent), information at bus stops (56 percent), eBusbook from OCTA’s website (56 percent), the Telephone Customer Information Center (52 percent), OCTA mobile website (51 percent), and the Trip Planner on OCTA’s website (51 percent).

Table 10 identifies by ethnicity the effectiveness for each source of fixed-route information.

Table 10: Percentage Effectiveness of Information Sources by Ethnicity

	Ethnicity (QD9)					
	Caucasian / White	Latino / Hispanic	Af Amer / Black	Amer Indian	Asian American	Other / Mixed
Printed Bus Books	50%	53%	54%	47%	43%	51%
Text4Next	35%	47%	42%	42%	28%	44%
eBusbook from OCTA's website	33%	39%	43%	33%	34%	46%
Information at Bus Stops	31%	41%	35%	32%	31%	40%
OCTA mobile site	30%	38%	33%	27%	30%	38%
Telephone Customer Information Center	33%	36%	39%	25%	22%	41%
Trip Planner from OCTA's website	32%	35%	34%	34%	26%	33%
Google Transit website	28%	34%	33%	35%	30%	42%
Advertising inside buses	21%	32%	28%	30%	17%	33%
On-bus Rider Alert flyers	21%	31%	26%	27%	19%	27%
Email/Rider Alerts	21%	30%	25%	25%	17%	23%
Special Promotional Service Brochure on bus	20%	30%	26%	29%	15%	30%
Advertising on outside of bus	21%	28%	25%	33%	17%	32%
Social Media - Facebook and/or Twitter	18%	28%	23%	26%	15%	26%
511 (phone)	18%	26%	21%	25%	13%	29%
Go511.com website	17%	23%	19%	23%	12%	28%

2014 Fixed-Route Bus Service Customer Satisfaction Survey – True North Research

Factor Four Summary

- Approximately 80 percent of survey respondents prefer to receive fixed-route bus information in English.
- As of 2020, the most preferred method of receiving fixed-route bus information was the OCTA website.

Four-Factor Analysis Conclusion

- As of the 2021 American Community Survey, the overall population of Orange County has decreased by 0.57 percent from 2018.
- The French language no longer meets the required threshold of five percent of the population or the 1,000 LEP speaker provision in Orange County.
- The overall number of LEP student enrollments for the past five years has declined in Orange County, including the top five non-English languages.
- Approximately 1.2 percent of Orange County's population over age 16 uses a public transportation bus to travel to work.
- Approximately 18,224 individuals take the bus to work as a means of transportation. Of those individuals, about 4,393 or 24 percent are estimated as individuals who speak English less than "very well" who can come in contact with OCTA fixed-route services.
- Apart from work, OCTA passengers also use the fixed-route bus service by means of transportation to public school or secondary education, errands, social/recreational activities, and doctor's appointments.
- Customer Satisfaction Survey respondents indicated the preferred language to receive information is English.
- Vital documents provided by the County of Orange Medi-Cal Mental Health services are translated into six languages that reflect the six highest language translation requests OCTA has received in the last three years.

Available Resources

OCTA has procured a qualified, professional language translation service to ensure that OCTA information is available in other languages. Information is available in Spanish regarding services, programs, and activities, including surveys, bus routes and fares, other information online, onboard buses, as well as in the Administrative Office buildings and OCTA Store. OCTA's eBusBook contains translations in both Spanish and Vietnamese. Information for major service and fare changes, as well as public hearings will be available in Spanish and Vietnamese. Other language translations are available upon request.

OCTA's website has the capability for translating website information into different languages and currently offers 18 out of the 21 languages that meet the Safe Harbor provision: Arabic, Chinese, Farsi (Persian), German, Gujarati, Hindi, Japanese, Khmer, Korean, Portuguese, Punjabi, Russian, Spanish, Tagalog, Thai, Ukrainian, Urdu, and Vietnamese. Translation for Hawaiian languages is not available at this time, and the remaining two safe harbor languages (other Indo-European languages and other languages of Asia) are too broad to identify translations.

OCTA utilizes an Employee Language Translator Volunteer database for additional language translation services upon request. Requests for languages in which OCTA does not have volunteer translators are handled using interpretation services through the Customer Relations Language Line.

OCTA's Customer Relations Department, which manages customer comments by phone, mail, email, and in-person currently benefits from staff members who speak Spanish. The Customer Relations team also utilizes translation services provided by the Language Line for customers who speak other languages, providing OCTA with the ability to communicate with over 160 different languages. The OCTA Store, which makes available bus passes and is an informational source for the general public on transit information, is also staffed by two representatives who speak Spanish.

OCTA's Customer Information Center (CIC) is a telephone-based information service that manages customer inquiries primarily concerning bus transit trip generation. The CIC is a procured service operated by a firm which has satisfied all agency Disadvantaged Business Enterprise, Minority Business Enterprise, and Women Business Enterprise requirements. In addition to the majority bi-lingual staff (English/Spanish), the CIC also utilizes translation services provided by the Language Line as needed.

Vital documents are defined as those documents without which a person would be unable to access services. The following are vital written communications that are printed in English, Spanish, Vietnamese, Chinese, Korean, and Persian for Title VI: Title VI Protection Notification, Title VI Complaint Procedure and Form. Marketing materials for major service and fare changes and Public Hearing Notices will be available in English, Spanish, and Vietnamese. Complementary paratransit service (OC ACCESS) vital written documents such as the application form are currently available in English and Spanish. During the triennial period, the application form will have additional translations made available in Vietnamese, Chinese, Korean, and Persian. The ADA customer comment form, including OC ACCESS, is used to file complaints, appeals, general comments, etc. This form, in addition to OC ACCESS eligibility and determination information are available for translation in 18 languages on the OCTA website.

Language Assistance Implementation Plan:

Based on the four-factor analysis, OCTA has identified Spanish as the primary language assistance needs and services required to provide meaningful access to information for the LEP residents of Orange County. OCTA will review its LEP Plan on a triennial basis and incorporate LEP data gathering ventures, such as surveys, to further identify additional language area-specific needs for the top languages identified. A review of OCTA's relevant programs, activities, and services that are being offered or will be offered by OCTA as of October 2023 include:

- The Language Line will be available for customers who speak other languages, providing OCTA with the ability to communicate with over 160 different languages.
- OCTA Coach Operators that are bi-lingual and are able to assist members of the public.
- Non-bilingual Coach Operators can assist members of the public utilizing other passengers who speak another language or by providing the customer with the CIC phone number for language assistance.
- OCTA has a qualified, professional language translation service to ensure that OCTA information is accurately translated to other languages.
- OCTA will utilize the Employee Language Translator Volunteer database for additional language translation services upon request.
- "I Speak" cards are available at OCTA reception desks to assist members of the public with obtaining translation services.
- Geographic Information System (GIS) maps have been developed for six of the DOJ Safe Harbor languages to which OCTA has received the highest number of requests for language assistance within the last three years (Arabic, Chinese, Korean, Persian, Spanish, and Vietnamese). According to the Census Bureau, due to small sample counts, data tabulations are not available for all languages. Therefore, Persian (including Farsi) has been grouped into "Other Indo-European languages". (See maps included with Plan.)
- OCTA will provide marketing materials for major service and fare changes in English, Spanish, and Vietnamese. Information in other languages are available upon request.
- Route and schedule information in the eBusbook are available in English, Spanish, and Vietnamese.
- The OCTA website contains route and schedule information, which can be translated into 18 of the DOJ safe harbor languages.
- A supplemental language bus placard is on all vehicles in seven languages and pictographs to notify the beneficiaries of Title VI protection and the information to file a claim and/or receive additional translation services.
- OCTA continues to distribute surveys to actively evaluate community and language needs for future program enhancements.

OCTA will actively and regularly contact the community organizations that serve LEP persons to identify any additional information or activities that might better improve OCTA's services to assure non-discriminatory service to LEP persons. The following is a list of community organizations that have been contacted or will be contacted to assist in gathering information about services most frequently sought by the LEP population:

- Small-Business Diversity Network
- Asian Business Association of Orange County
- Vietnamese Chamber of Commerce of Orange County
- Korean Resource Center

- Orange County Hispanic Chamber of Commerce
- Regional Center of Orange County
- Iranian-American Chamber of Commerce of Orange County
- Black Chamber of Commerce of Orange County
- Latino Health Access
- Abrazar Inc.
- CalOptima
- Council of Aging Southern California

Training Staff

Coach Operators have the most frequent contact with LEP persons through daily interaction with passengers during fixed-route hours of operations. Customer Service Representatives and the General Services staff also have frequent contact with LEP persons, either in person at the OCTA administrative offices or by telephone.

All newly hired Coach Operators receive Title VI training on the final day of a six-week training program. Title VI training topics include:

- Understanding Title VI responsibilities;
- The language assistance services offered by OCTA;
- Specific procedures to be followed when encountering a LEP person;
- Assisting passengers/members of the public in obtaining Title VI information, and how to obtain complaint procedure information and translation services.

OCTA Customer Relations and OCTA Store team members also have frequent contact with LEP members of the public. Title VI training was provided for both groups during the triennial period.

CONCLUSION

The LEP Plan is designed to be flexible and to be reviewed as an ongoing process. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons and also to monitor changes in demographics and types of services in those demographics. When changes occur, the LEP Plan will be updated as appropriate, but no less than every three years.

OCTA will post the LEP Plan on its website at www.OCTA.net. Copies of the LEP plan will be provided to any person or agency requesting a copy. LEP persons may obtain copies/translations of the LEP plan upon request.

Any questions or comments regarding this Plan should be directed to:

Maggie McJilton
Executive Director, People and Community
Engagement
Federal Compliance Officer
Orange County Transportation Authority
550 South Main Street Orange, CA 92863-1584
Phone: 714-560-5824
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Christina Perez
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2021 ACS 5-Year Population Estimates: Population Estimates: Sex by Age
 2021 ACS 5-Year Estimates: Means of Transportation to Work (Public transportation (excluding taxicab): Bus)
 2021 ACS 5-Year Estimates: Language Spoken at Home, Who Speak English "Less than Very Well"

City	Zip Code (ZCTA)	2021 Population [1]	Means of Transportation to Work by Bus [2]	Spanish			Korean			Chinese			Vietnamese			Arabic		
				Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work	Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work	Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work	Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work	Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work
Buena Park	90620	47,104	0.4%	6.6%	3,103	11	2.8%	1,320	5	1.4%	656	2	0.8%	374	1	0.3%	144	1
Buena Park	90621	36,385	0.6%	10.6%	3,854	23	8.7%	3,182	19	0.6%	229	1	0.6%	209	1	0.0%	7	0
La Palma	90623	15,703	0.2%	2.2%	340	1	4.8%	753	1	2.5%	385	1	1.4%	220	0	0.3%	53	0
Cypress	90630	50,543	0.2%	2.8%	1,398	2	6.0%	3,036	5	1.8%	901	1	1.1%	576	1	0.1%	54	0
La Habra	90631	69,601	0.7%	11.8%	8,210	58	2.6%	1,811	13	1.0%	687	5	0.1%	59	0	0.2%	108	1
Stanton	90680	30,500	1.0%	14.9%	4,551	43	0.9%	261	2	0.5%	167	2	10.2%	3,114	30	0.8%	229	2
Los Alamitos	90720	23,660	0.3%	2.1%	487	1	0.7%	169	0	0.4%	90	0	0.5%	111	0	0.0%	-	-
Seal Beach	90740	24,721	0.4%	1.6%	401	1	3.0%	742	3	0.7%	182	1	0.2%	49	0	0.5%	120	0
Sunset Beach	90742	470	0.0%	0.0%	-	-	0.0%	-	-	0.0%	-	-	0.0%	-	-	0.0%	-	-
Surfside	90743	487	0.0%	0.0%	-	-	0.0%	-	-	4.3%	21	-	0.0%	-	-	0.0%	-	-
Irvine	92602	27,425	0.0%	1.3%	350	-	3.2%	881	-	5.6%	1,536	-	1.3%	344	-	0.6%	155	-
Irvine	92603	19,128	0.0%	0.3%	55	-	2.9%	556	-	5.0%	948	-	1.5%	285	-	0.1%	18	-
Irvine	92604	29,983	0.1%	2.1%	630	1	2.7%	807	1	4.9%	1,475	1	0.8%	253	0	0.3%	79	0
Irvine	92606	25,126	0.3%	0.6%	151	0	2.5%	636	2	3.9%	971	3	1.3%	335	1	0.6%	142	0
Foothill Ranch	92610	12,524	0.2%	1.1%	134	0	0.5%	61	0	1.3%	165	0	1.1%	136	0	0.0%	-	-
Irvine	92612	34,640	0.6%	1.3%	438	3	1.3%	449	3	7.2%	2,485	15	0.4%	143	1	0.3%	91	1
Irvine	92614	29,307	0.4%	0.7%	195	1	1.7%	493	2	3.2%	925	3	0.8%	244	1	0.4%	122	0
Irvine	92618	54,368	0.0%	1.1%	587	0	3.2%	1,724	0	6.8%	3,704	0	0.7%	358	0	1.0%	544	0
Irvine	92620	60,344	0.0%	0.5%	318	-	3.7%	2,249	-	7.9%	4,775	-	0.6%	378	-	0.1%	72	-
Capistrano Beach	92624	6,398	0.4%	3.9%	250	1	0.0%	1	0	0.0%	-	-	0.0%	-	-	0.0%	-	-
Corona Del Mar	92625	13,102	0.0%	0.4%	55	-	0.0%	-	-	2.0%	268	-	0.2%	24	-	0.0%	-	-
Costa Mesa	92626	50,389	1.0%	5.9%	2,977	31	0.2%	103	1	0.7%	349	4	1.8%	903	9	0.1%	72	1
Costa Mesa	92627	62,575	0.7%	12.7%	7,930	56	0.1%	35	0	0.2%	97	1	0.3%	175	0	0.0%	-	-
Dana Point	92629	26,929	0.5%	2.1%	553	3	0.1%	23	0	0.0%	8	0	0.1%	18	0	0.2%	44	0
Lake Forest	92630	66,621	0.7%	6.0%	4,000	29	0.4%	259	2	1.6%	1,097	8	0.7%	494	4	0.3%	221	2
Huntington Beach	92646	55,939	0.2%	1.2%	696	1	0.1%	53	0	0.7%	415	1	1.8%	1,017	2	0.0%	-	-
Huntington Beach	92647	60,592	0.3%	3.8%	2,305	7	0.3%	194	1	0.6%	371	1	2.9%	1,731	5	0.4%	233	1
Huntington Beach	92648	45,612	0.1%	1.9%	859	1	0.1%	56	0	1.2%	539	1	1.6%	724	1	0.2%	98	0
Huntington Beach	92649	36,130	0.2%	0.9%	314	1	0.1%	44	0	0.5%	169	0	1.0%	350	1	0.0%	-	-
Laguna Beach	92651	24,042	0.3%	1.2%	289	1	0.1%	24	0	0.1%	30	0	0.0%	11	0	0.7%	169	0
Laguna Hills	92653	30,183	0.4%	5.4%	1,631	6	0.5%	163	1	1.0%	309	1	1.9%	587	2	0.3%	101	0
Midway City	92655	8,440	0.3%	10.6%	891	2	0.4%	31	0	0.9%	77	0	26.2%	2,212	6	0.3%	26	0
Aliso Viejo	92656	53,169	0.3%	2.7%	1,438	4	0.5%	258	1	1.0%	524	1	0.5%	271	1	0.2%	109	0
Newport Coast	92657	9,342	0.0%	0.0%	-	-	1.2%	110	-	2.7%	252	-	1.1%	104	-	0.0%	-	-
Newport Beach	92660	36,100	0.0%	1.4%	496	-	0.3%	100	-	1.1%	409	-	0.0%	-	-	0.1%	37	-
Newport Beach	92661	3,279	0.0%	0.2%	8	-	0.0%	-	-	0.0%	-	-	0.0%	-	-	0.0%	-	-
Newport Beach	92662	2,471	0.0%	0.2%	5	-	0.0%	-	-	0.0%	-	-	0.0%	-	-	0.0%	-	-
Newport Beach	92663	21,523	0.4%	1.5%	328	1	0.0%	6	0	0.4%	83	0	0.1%	27	0	0.0%	-	-
San Clemente	92672	38,872	0.3%	3.3%	1,276	4	0.2%	64	0	0.2%	88	0	0.0%	3	0	0.1%	46	0
San Clemente	92673	30,972	0.0%	1.1%	340	0	0.0%	4	0	0.0%	-	-	0.1%	21	0	0.0%	-	-
San Juan Capistrano	92675	35,319	1.1%	11.5%	4,065	43	0.1%	28	0	0.1%	39	0	0.1%	43	0	0.0%	-	-
Silverado	92676	1,988	0.0%	1.7%	34	-	0.0%	-	-	0.3%	5	-	0.0%	-	-	0.0%	-	-
Laguna Niguel	92677	64,608	0.0%	3.5%	2,286	0	0.2%	134	0	1.1%	726	0	0.2%	157	0	0.1%	73	0
Trabuco Canyon	92678	638	0.0%	1.1%	7	-	0.0%	-	-	0.6%	4	-	0.0%	-	-	0.0%	-	-
Trabuco Canyon	92679	31,406	0.0%	0.8%	266	-	0.5%	147	-	1.0%	324	-	0.1%	28	-	0.1%	18	-
Westminster	92683	91,267	0.5%	6.3%	5,708	27	0.3%	302	1	1.0%	931	4	25.3%	23,046	110	0.4%	379	2
Rancho Santa Margarita	92688	44,386	0.0%	3.3%	1,472	1	0.2%	79	0	0.5%	203	0	0.2%	83	0	0.2%	77	0
Mission Viejo	92691	48,437	0.2%	4.3%	2,091	5	0.7%	317	1	0.6%	295	1	0.9%	413	1	0.1%	40	0
Mission Viejo	92692	46,240	0.0%	3.0%	1,377	1	0.0%	-	-	1.3%	600	0	2.3%	1,066	0	0.4%	174	0
Ladera Ranch	92694	34,879	0.0%	0.6%	197	0	0.3%	120	0	0.9%	301	0	0.1%	34	0	0.0%	15	0
Santa Ana	92701	49,008	1.8%	34.7%	17,003	308	0.1%	30	1	0.2%	108	2	0.4%	189	3	0.0%	-	-
Santa Ana	92703	64,387	1.7%	31.7%	20,406	354	0.1%	53	1	0.5%	294	5	8.3%	5,325	92	0.0%	-	-
Santa Ana	92704	79,641	1.7%	23.7%	18,861	329	0.1%	68	1	0.3%	226	4	7.6%	6,024	105	0.0%	28	0
Santa Ana	92705	47,851	0.3%	13.0%	6,217	21	0.5%	235	1	0.6%	270	1	0.6%	306	1	0.0%	7	0
Santa Ana	92706	36,694	1.1%	24.8%	9,117	100	0.6%	202	2	0.4%	162	2	2.8%	1,026	11	0.0%	8	0
Santa Ana	92707	60,478	1.9%	26.5%	16,034	298	0.1%	59	1	0.3%	198	4	1.4%	828	15	0.1%	40	1
Fountain Valley	92708	57,139	0.1%	2.0%	1,133	1	0.6%	343	0	1.4%	788	1	10.8%	6,183	6	0.9%	518	0
Tustin	92780	54,840	0.5%	14.3%	7,832	42	0.5%	257	1	1.0%	537	3	1.0%	527	3	0.2%	105	1
Tustin	92782	30,123	0.2%	2.7%	807	1	2.7%	812	1	3.4%	1,031	2	0.7%	215	0	0.0%	9	0
Anaheim	92801	65,662	1.4%	18.8%	12,357	174	1.6%	1,056	15	0.6%	362	5	2.7%	1,760	25	1.0%	649	9
Anaheim	92802	42,911	1.4%	22.0%	9,440	134	0.6%	258	4	0.3%	130	2	3.2%	1,362	19	0.3%	133	2
Anaheim	92804	86,503	1.0%	11.7%	10,125	106	0.7%	602	6	0.8%	732	8	6.9%	5,989	63	0.9%	789	8
Anaheim	92805	73,736	1.2%	23.7%	17,441	216	0.5%	397	5	0.6%	465	6	1.4%	1,020	13	0.4%	273	3

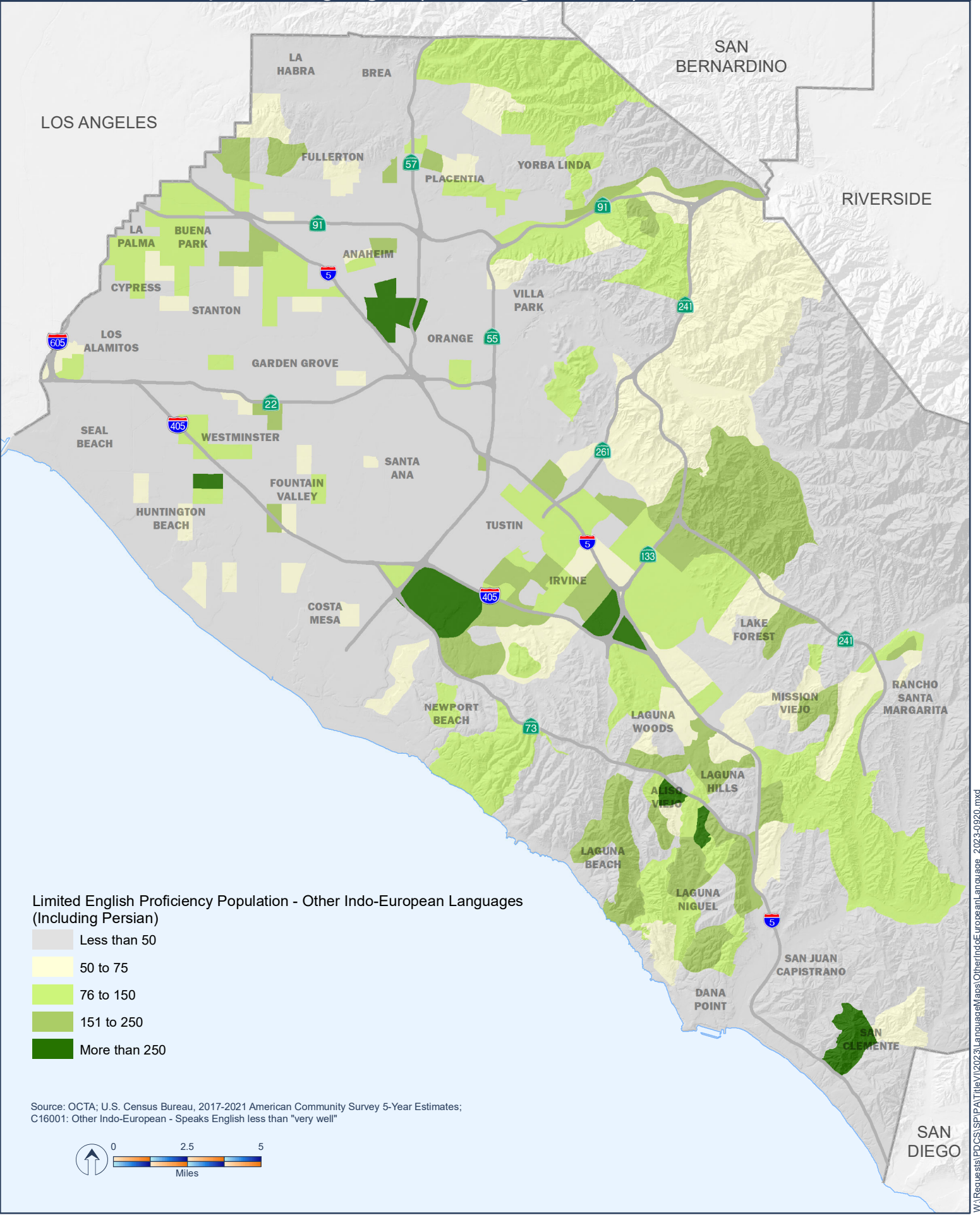
City	Zip Code (ZCTA)	2021 Population [1]	Means of Transportation to Work by Bus [2]	Spanish			Korean			Chinese			Vietnamese			Arabic		
				Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work	Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work	Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work	Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work	Speaks English "Less Than Very Well"	Number of LEP Population [3]	Potential Number of LEP Bus to Work
Anaheim	92806	40,009	1.1%	15.0%	6,019	64	0.2%	88	1	0.8%	319	3	1.7%	664	7	0.7%	264	3
Anaheim	92807	36,110	0.2%	3.9%	1,413	2	0.5%	179	0	0.7%	253	0	0.7%	265	0	0.3%	108	0
Anaheim	92808	21,496	0.3%	1.5%	315	1	0.6%	119	0	1.1%	227	1	0.8%	175	0	0.5%	100	0
Brea	92821	41,286	0.1%	4.2%	1,752	2	3.8%	1,562	2	1.4%	585	1	0.1%	53	0	0.1%	35	0
Brea	92823	5,626	0.0%	0.0%	-	-	6.1%	344	-	4.7%	266	-	0.9%	49	-	0.0%	-	-
Fullerton	92831	36,859	0.4%	6.9%	2,525	11	1.4%	514	2	1.3%	472	2	0.7%	256	1	0.3%	127	1
Fullerton	92832	25,720	1.6%	13.5%	3,477	55	1.8%	471	7	0.1%	25	0	1.1%	280	4	0.0%	-	-
Fullerton	92833	53,188	0.7%	8.3%	4,423	29	9.8%	5,203	34	1.2%	647	4	0.5%	267	2	0.1%	64	0
Fullerton	92835	26,917	0.0%	2.5%	686	-	3.1%	824	-	2.0%	527	-	0.3%	72	-	1.0%	258	-
Garden Grove	92840	53,681	0.8%	10.9%	5,877	44	1.1%	594	4	0.9%	487	4	14.6%	7,843	59	0.3%	172	1
Garden Grove	92841	34,650	0.8%	9.2%	3,176	26	2.4%	832	7	0.9%	298	2	21.0%	7,272	61	0.2%	63	1
Garden Grove	92843	48,413	0.8%	15.3%	7,403	62	0.5%	226	2	0.6%	294	2	23.6%	11,444	96	0.1%	40	0
Garden Grove	92844	22,601	0.7%	7.4%	1,672	11	3.7%	839	6	1.1%	248	2	25.8%	5,821	39	0.2%	47	0
Garden Grove	92845	15,240	0.0%	1.0%	150	-	0.3%	41	-	1.3%	201	-	1.9%	286	-	0.3%	49	-
Villa Park	92861	5,864	0.1%	0.8%	48	0	0.3%	16	0	0.4%	25	0	1.0%	56	0	0.0%	-	-
Orange	92865	21,384	0.7%	7.5%	1,604	11	0.2%	50	0	1.4%	293	2	0.8%	167	1	0.1%	19	0
Orange	92866	14,966	1.4%	4.9%	734	10	0.1%	8	0	0.3%	42	1	0.3%	43	1	0.1%	15	0
Orange	92867	44,232	0.3%	9.0%	3,975	13	0.4%	187	1	0.8%	356	1	0.7%	295	1	0.3%	114	0
Orange	92868	27,233	0.8%	11.3%	3,090	24	1.4%	370	3	0.7%	198	2	1.4%	392	3	0.1%	15	0
Orange	92869	36,174	0.1%	9.0%	3,266	4	0.6%	233	0	1.2%	422	0	1.7%	623	1	0.2%	66	0
Placentia	92870	53,126	0.5%	6.6%	3,486	16	1.2%	647	3	1.4%	736	3	0.8%	431	2	0.1%	44	0
Yorba Linda	92886	50,764	0.1%	1.8%	901	1	1.5%	743	0	2.5%	1,246	1	0.4%	223	0	0.2%	81	0
Yorba Linda	92887	20,395	0.2%	2.0%	407	1	0.3%	66	0	3.1%	630	1	1.0%	212	0	0.4%	83	0
Total		3,158,774	0.57%	8.6%	272,518	2,840	1.3%	40,313	177	1.4%	42,915	137	3.4%	108,673	817	0.3%	8,193	46

LEP Population Estimate	557,104
Number of Population Takes the Bus to Work	18,066
Potential Number of LEP Riders	4,393

Estimated % Overall Transit Riders per LEP Language Population	16%	1%	1%	5%	0.3%
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[1] B01001 Source: U.S. Census Bureau, 2021 ACS 5-Year Population Estimates: Sex by Age
 [2] B08006 Source: U.S. Census Bureau, 2021 ACS 5-Year Estimates: Sex of Workers by Means of Transportation to Work (Public transportation (excluding taxicab): Bus)
 [3] C16001 Source: U.S. Census Bureau, 2021 ACS 5-Year Population Estimates: Language Spoken at Home, Who Speak English "Less than Very Well"
 All Other Languages include French, Haitian, or Cajun; German or other West Germanic languages; Russian, Polish, or other Slavic languages; Other Indo-European languages; Tagalog; Other Asian and Pacific Island languages; Other and unspecified languages

Limited English Proficiency Population - Other Indo-European Languages (Including Persian)



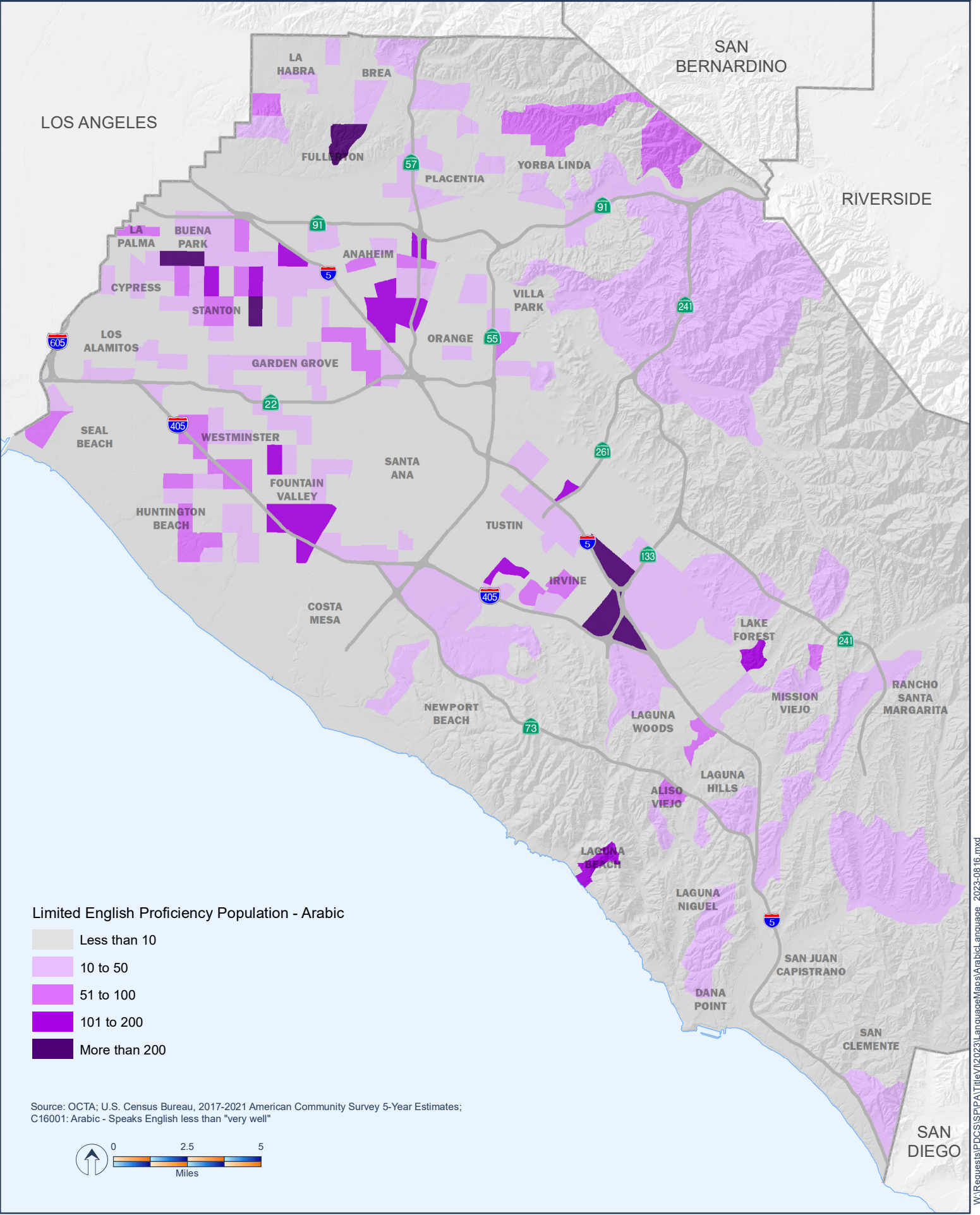
Limited English Proficiency Population - Other Indo-European Languages (Including Persian)

- Less than 50
- 50 to 75
- 76 to 150
- 151 to 250
- More than 250

Source: OCTA; U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates; C16001: Other Indo-European - Speaks English less than "very well"



Limited English Proficiency Population - Arabic



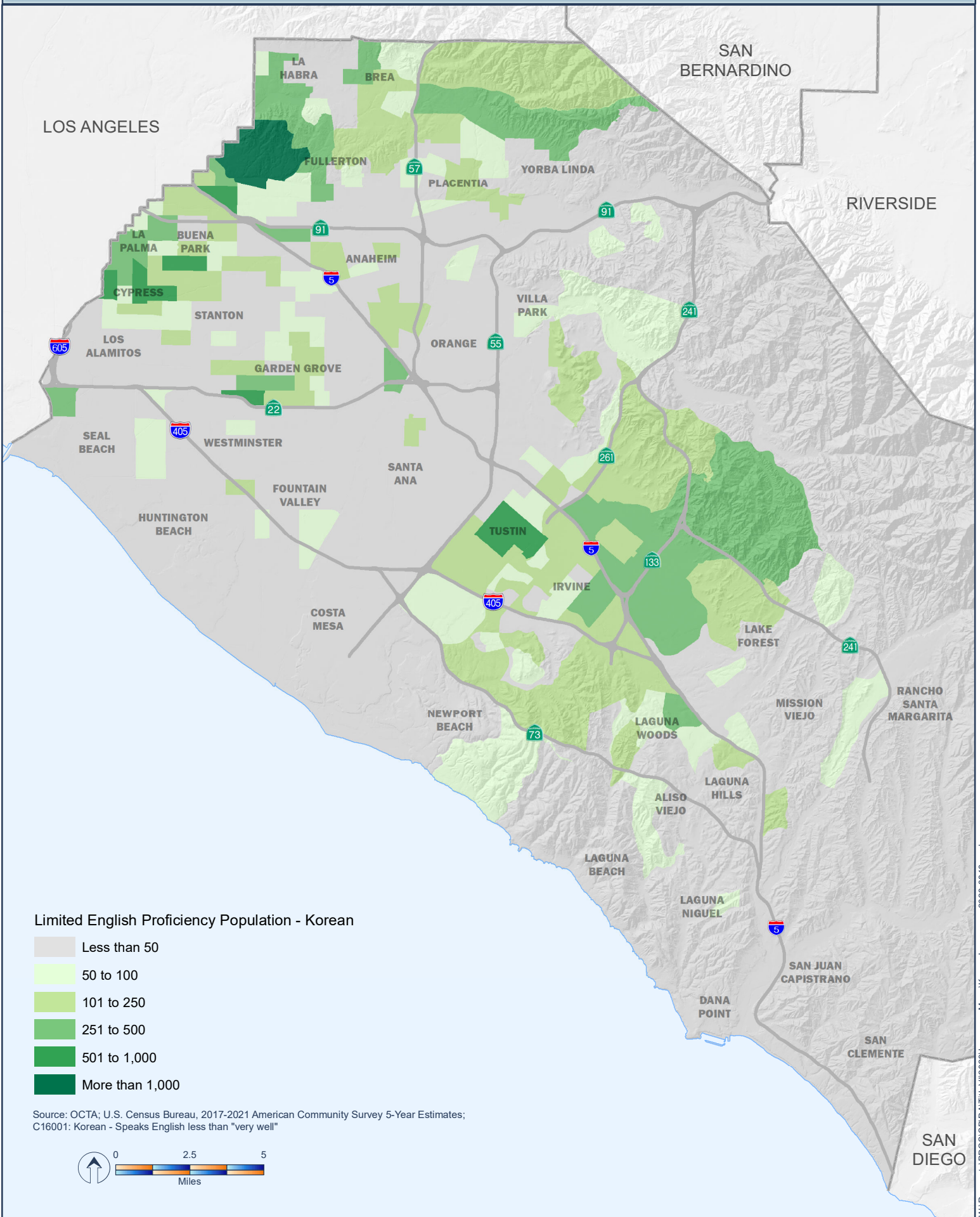
Limited English Proficiency Population - Arabic

- Less than 10
- 10 to 50
- 51 to 100
- 101 to 200
- More than 200

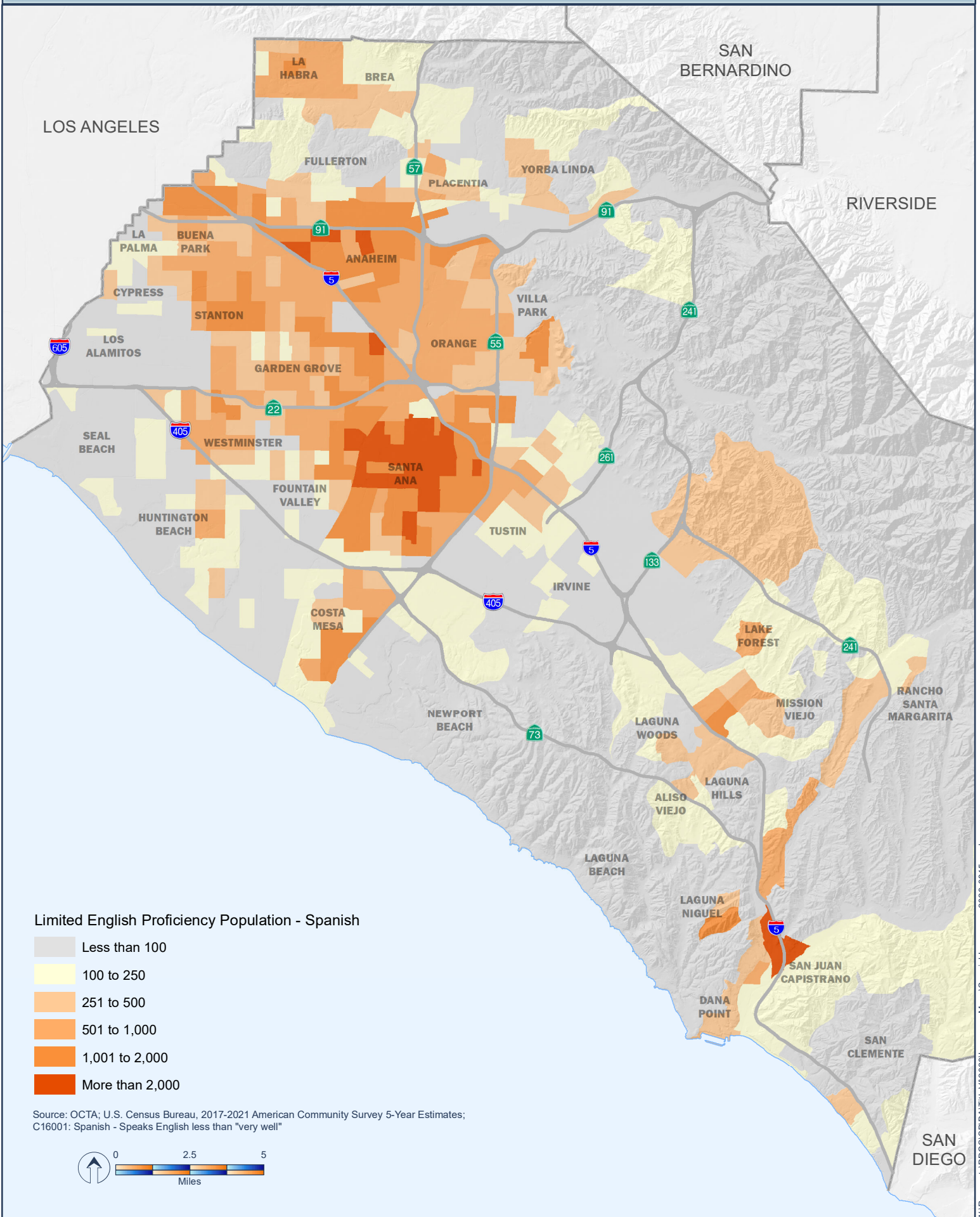
Source: OCTA; U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates; C16001: Arabic - Speaks English less than "very well"



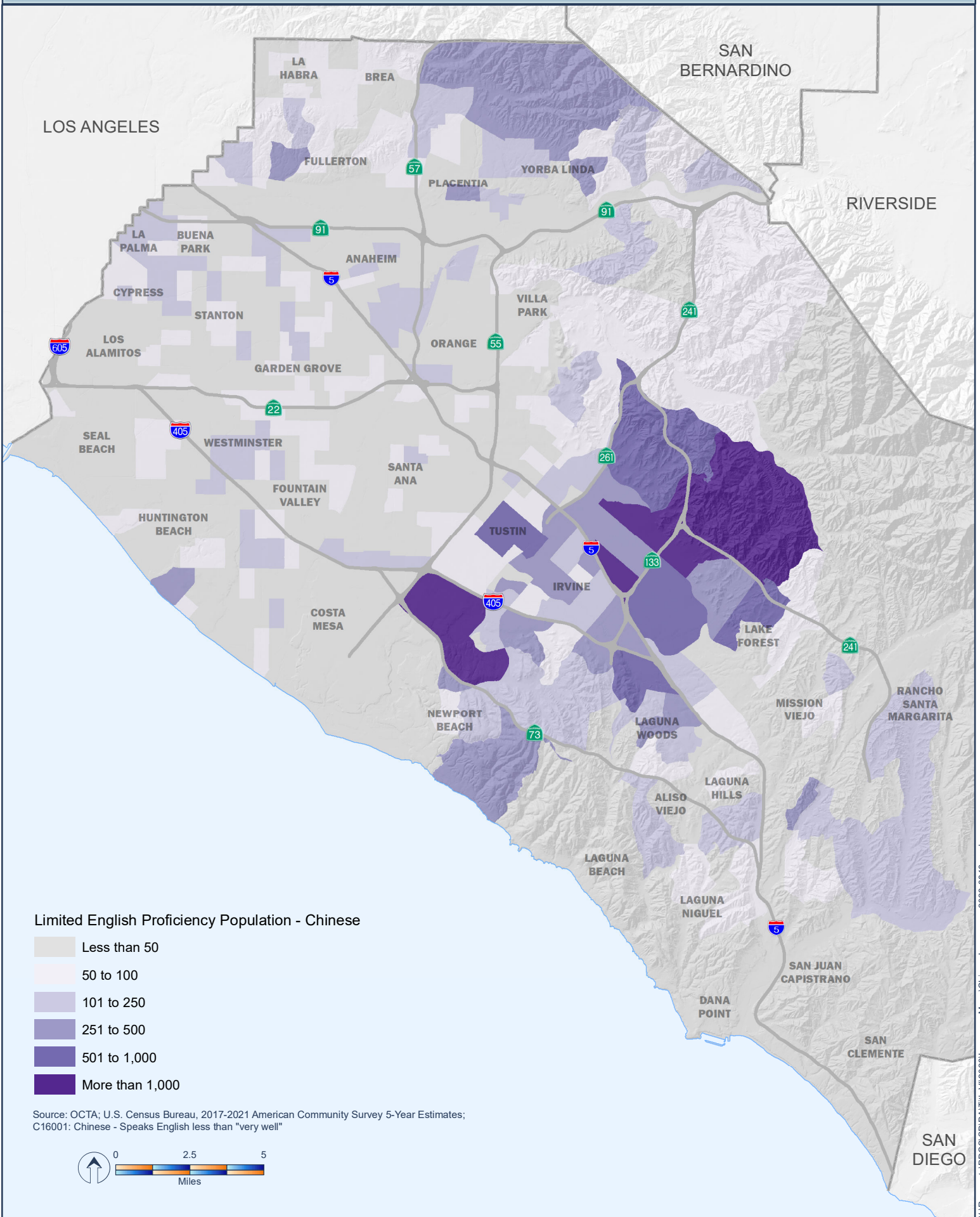
Limited English Proficiency Population - Korean



Limited English Proficiency Population - Spanish



Limited English Proficiency Population - Chinese



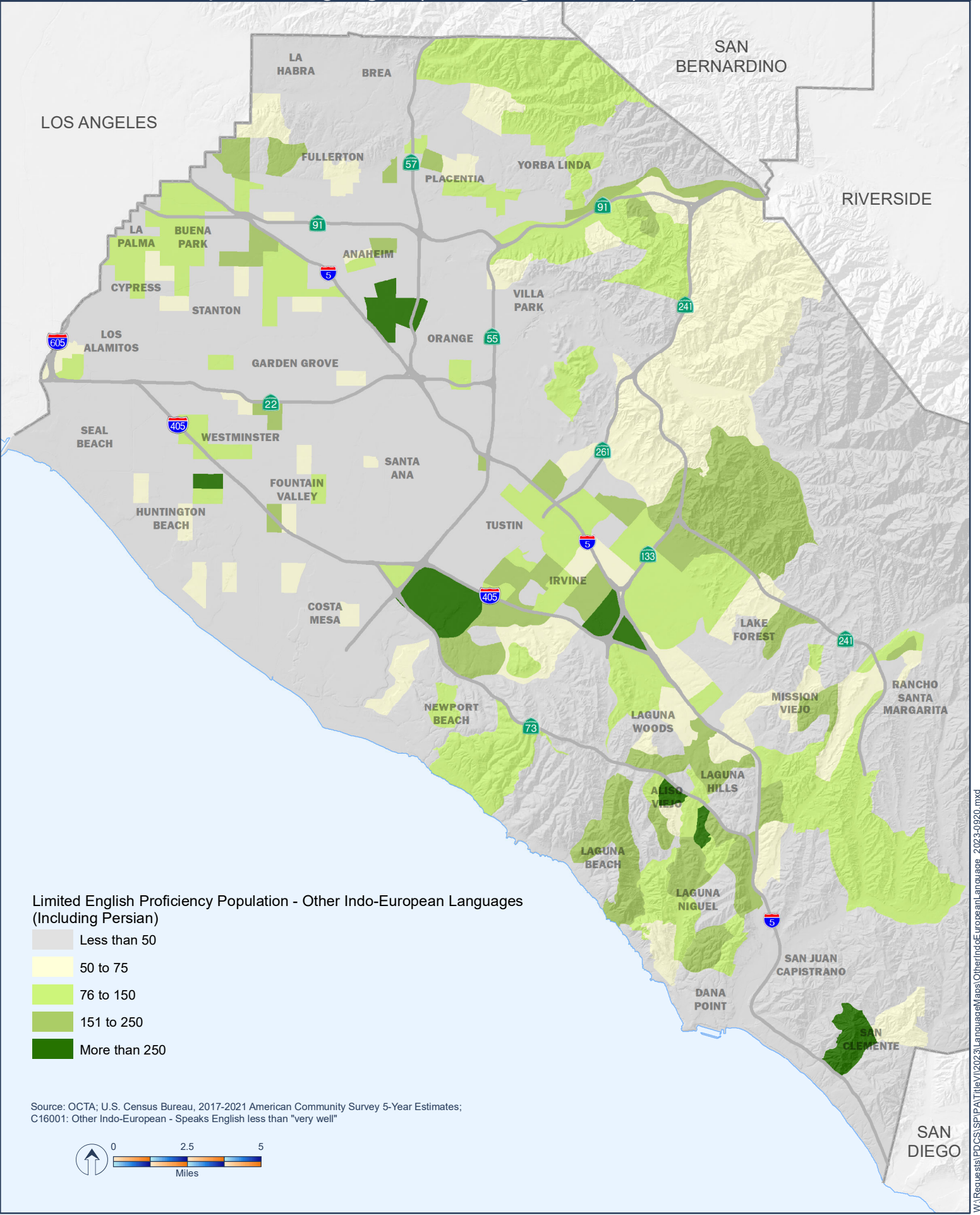
Limited English Proficiency Population - Chinese

- Less than 50
- 50 to 100
- 101 to 250
- 251 to 500
- 501 to 1,000
- More than 1,000

Source: OCTA; U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates; C16001: Chinese - Speaks English less than "very well"



Limited English Proficiency Population - Other Indo-European Languages (Including Persian)



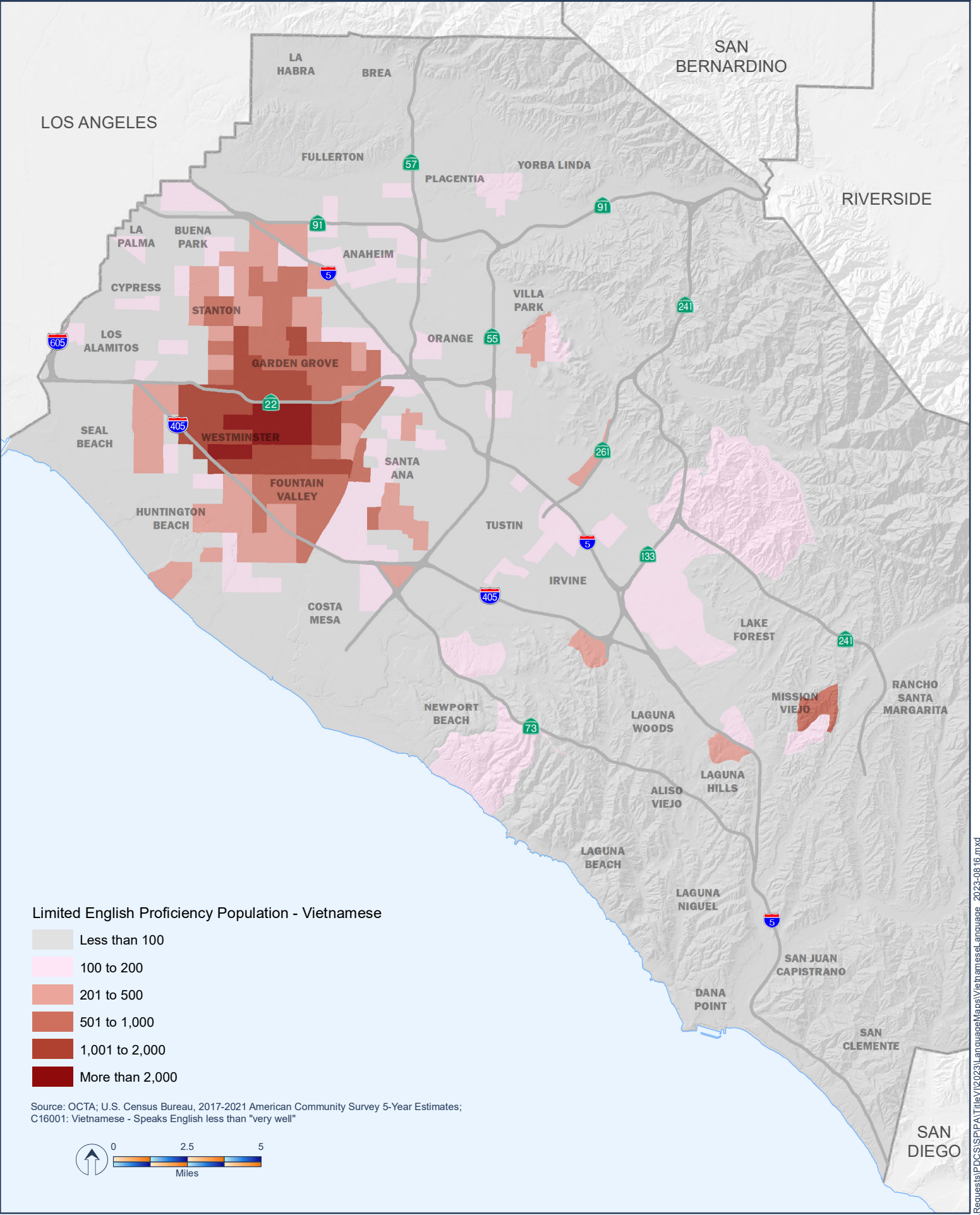
Limited English Proficiency Population - Other Indo-European Languages (Including Persian)

- Less than 50
- 50 to 75
- 76 to 150
- 151 to 250
- More than 250

Source: OCTA; U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates; C16001: Other Indo-European - Speaks English less than "very well"



Limited English Proficiency Population - Vietnamese



Limited English Proficiency Population - Vietnamese

- Less than 100
- 100 to 200
- 201 to 500
- 501 to 1,000
- 1,001 to 2,000
- More than 2,000

Source: OCTA; U.S. Census Bureau, 2017-2021 American Community Survey 5-Year Estimates; C16001: Vietnamese - Speaks English less than "very well"





Call to Order

The October 23, 2023, regular meeting of the Orange County Transportation Authority (OCTA) Board of Directors and affiliated agencies was called to order by Chairman Hernandez at 9:00 a.m. at the OCTA Headquarters, 550 South Main Street, Orange, California.

Directors Present: Gene Hernandez, Chairman
Tam Nguyen, Vice Chairman
Doug Chaffee
Jose Diaz
Andrew Do
Jon Dumitru
Jamey Federico
Katrina Foley
Patrick Harper
Steve Jones
Fred Jung
Farrah N. Khan
Jessie Lopez
Vicente Sarmiento
Donald P. Wagner

Directors Absent: Brian Goodell
Michael Hennessey

Staff Present: Darrell E. Johnson, Chief Executive Officer
Jennifer L. Bergener, Deputy Chief Executive Officer
Gina Ramirez, Clerk of the Board Specialist, Principal
Sahara Meisenheimer, Clerk of the Board Specialist
James Donich, General Counsel

Special Calendar

1. Presentation of Resolutions of Appreciation for Employees of the Month

Resolutions of Appreciation were presented to Terrall Turner, Coach Operator, Rogelio Gutierrez, Maintenance, and Lauren Soto, Administration, as Employees of the Month for October 2023.

Consent Calendar (Items 2 through 13)

2. Approval of Minutes

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present, to approve the minutes of the October 9, 2023 Orange County Transportation Authority and affiliated agencies' regular meeting.



3. Approval to Release Request for Proposals for Independent Annual Financial Auditing Services

Director Wagner pulled this item and requested a breakdown of the cost to do a full audit in the Request for Proposals.

A motion was made by Director Wagner, seconded by Director Jones, and declared passed by those present, to:

- A. Approve the proposed evaluation criteria and weightings for Request for Proposals 3-2931 to select an independent public accounting firm to provide annual financial and compliance audits and agreed-upon procedures reviews.
- B. Approve the release of Request for Proposals 3-2931 for independent annual financial auditing services effective April 1, 2024 through March 31, 2027, with one, two-year option term.

4. Agreement with the California Highway Patrol for Enforcement Services on the 405 Express Lanes

Director Wagner pulled this item and inquired about California Highway Patrol overtime hours.

A motion was made by Director Wagner, seconded by Director Foley, and declared passed by those present, to authorize the Chief Executive Officer to negotiate and execute Agreement No. C-3-2860, between the Orange County Transportation Authority and California Highway Patrol, for a contract term of ten years, in an amount not to exceed \$15,000,000, for toll and traffic enforcement services on the 405 Express Lanes.

5. SB1 (Chapter 5, Statutes of 2017) State of Good Repair Claims for Fiscal Year 2023-24

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present, to authorize the filing of SB 1 State of Good Repair claims, in the amount of \$6,877,180, or up to the actual allocation published by the State Controller's Office, to fund capital projects approved by the Orange County Transportation Authority Board of Directors.

6. State Transit Assistance Fund Claims for Fiscal Year 2023-24

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present, to adopt Resolution No. 2023-056 to authorize the filing of State Transit Assistance Fund claims, in the amount of \$52,744,419, or up to the actual allocation published by the State Controller's Office, to support public transportation.



7. Federal Legislative Status Report

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present to receive and file as an information item.

8. Draft Revisions to the Orange County Transportation Authority's 2023-24 State and Federal Legislative Platforms

Director Foley asked for clarification if her requested changes were implemented.

Darrell E. Johnson, Chief Executive Officer (CEO), responded the changes will be implemented when the item return for approval.

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present, to direct staff to integrate the recommended revisions to the 2023-24 Orange County Transportation Authority State and Federal Legislative Platforms and seek further feedback from the Orange County Transportation Authority Board of Directors and internal staff, with subsequent drafts being brought forward for final consideration and adoption later this year.

9. Diversity Outreach Update

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present to receive and file as an information item.

10. Update to Orange County Transportation Authority Limited English Proficiency Plan

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present, to review and approve Orange County Transportation Authority's updated 2023 Limited English Proficiency Plan.

11. Agreement for the Rider Validation System

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present, to:

- A. Approve the selection of INIT Innovations in Transportation, Inc., as the firm to develop and implement a rider validation system for the Orange County Transportation Authority's fixed-route bus system.
- B. Authorize the Chief Executive Officer to negotiate and execute Agreement No. C-2-2980 between the Orange County Transportation Authority and INIT Innovations in Transportation, Inc., in the amount of \$11,627,150, for a five-year initial term with one, five-year option term for the development and implementation of a rider validation system for the Orange County Transportation Authority's fixed-route bus system.



12. Approval to Award Agreement for Lot Sweeping Services

A motion was made by Director Jung, seconded by Director Wagner, and declared passed by those present, to authorize the Chief Executive Officer to negotiate and execute Agreement No. C-3-2835 between the Orange County Transportation Authority and Superior Sweeping, Ltd., the lowest responsive, responsible bidder in the amount of \$374,592, for an initial term of two years with a one-year option term, to provide lot sweeping services.

13. OC Streetcar Project Quarterly Update

Darrell E. Johnson, CEO, explained that staff requested to pull this item. Ross Lew, Program Manager, narrated a video that displayed the status of 4th Street.

James Donich, General Counsel, provided an update on this item, noted that OCTA is currently in active litigation, and cautioned the Board on any comments made in the open session.

Public comments were received by:

- Renee Lancaster, CEO of Nova Academy
- Mialunne Rodriguez
- Ella Smaw
- Miguel Rios
- Melissa Mills
- Melissa Carillo
- Bryan Munoz
- Anabel Pineda
- Loris Pesante
- Cecila Andrade
- Enrique Marban
- Paul Hyek

No action was taken on this receive and file information item.

Regular Calendar

14. Interstate 405 Improvement Project Update

Jeff Mills, Senior Program Manager, and Kirk Avila, General Manager, provided a PowerPoint presentation.

No action was taken on this receive and file information item.



15. Adopt the Mitigated Negative Declaration Finding for the Orange County Maintenance Facility Project

Darrell E. Johnson, CEO, provided opening comments and introduced Jason Lee, Program Manager, who provided a PowerPoint presentation.

Gina Ramirez, Clerk of the Board, noted written public comments were received from Oliver Chi, Manager, City of Irvine, and Brian Yanity from Railpac.

A motion was made by Director Jung, seconded by Director Do, and declared passed by those present, to:

- A. Approve Resolution No. 2023-057 to adopt the Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program, pursuant to the California Environmental Quality Act, for the Metrolink Orange County Maintenance Facility.
- B. Approve the Metrolink Orange County Maintenance Facility.
- C. Authorize the Chief Executive Officer to direct staff to implement the Metrolink Orange County Maintenance Facility consistent with the 2015 Purchase and Sale Agreement between the City of Irvine and Orange County Transportation Authority.

Discussion Items

16 Public Comments

No public comments were received.

17. Chief Executive Officer's Report

Darrell E. Johnson, CEO, discussed the upcoming Metrolink closure scheduled from December 26th – 29th, as a part of the Los Angeles Union Station Modernization Project.

18. Directors' Reports

Director Foley announced the following for the 5th District:

- The Open House for the 5th District Satellite Office in Dana Point is today at 3:00 p.m.
- Encouraged any veterans to nominate a veteran for the Veteran of the Year award, which will be chosen on November 9 at the Dana Point Women's Club.

Director Khan shared that she hosted a Cal Optima event last Saturday and thanked OCTA for having a booth there.



19. Adjournment

The meeting adjourned at 10:55 a.m.

The next regularly scheduled meeting of this Board will be held:

9:00 a.m., on Monday, November 13, 2023

OCTA Headquarters
Board Room
550 South Main Street
Orange, California

ATTEST:

A handwritten signature in blue ink, appearing to read 'Gina Ramirez', is written over a horizontal line.

Gina Ramirez
Assistant Clerk of the Board

OCTA
Subrecipient Monitoring Procedures Guide



FTA SUBRECIPIENT MONITORING PROCEDURES GUIDE

Grant Compliance & Program Controls Office
Government Relations Division

June 2023

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1. Introduction and Purpose

The purpose of these FTA Subrecipient Oversight Procedures is to:

- Ensure that all technical specifications and cooperative/subrecipient agreement requirements are met by FTA subrecipients
- Monitor compliance with FTA requirements for FTA-funded vehicles or facilities that are maintained by subrecipients
- Monitor compliance with FTA requirements for transit services provided by subrecipients
- Identify performance issues and non-compliance with FTA requirements, and address them in a timely manner
- Track information regarding performance quality for the purposes of evaluating subrecipients of FTA funds for future grant awards
- Maximize the risk reduction benefits of limited resources

These procedures explain methods of monitoring, persons responsible, frequency, and expected deliverables associated with managing performance and compliance monitoring systems for rolling stock, construction, ADA paratransit, JARC and New Freedom programs, and fixed route services.

2. Scope and Applicability

This procedure applies to monitoring performance and compliance for the following types of FTA funded projects/programs:

- Transit
- Planning
- Capital Projects
- JARC and New Freedom

The frequency and type of monitoring will be based upon the following: a) size of the grant or cooperative agreement, b) associated risks, c) service complexity, d) type of grant and e) availability of resources needed to implement the program.

This document has been designed for FTA subrecipient monitoring, but it can be adapted to apply to OCTA direct contractors.

3. Subrecipient Definition

A subrecipient is a state or local government authority, non-profit organization, or operator of public transportation services that receives a grant indirectly through a direct grant recipient. This guide is designed for monitoring subrecipients of FTA funds.

To distinguish a subrecipient from a contractor, the following characteristics should be considered in keeping with *2 CFR 200.330 Subrecipient and Contractor Determinations* as derived from *OMB Circular A-*

133, Section 210. It is not expected that all the subrecipient characteristics will be present, and judgment must be used in determining whether a contract represents a subrecipient or contractor relationship.

Federal Award received by a Subrecipient	Payment for Goods and Services (Contractor)
<p>A subrecipient determines the means and methods for carrying out the state or Federal Program.</p> <p>Has responsibility for program decision making within the terms of the agreement.</p>	<p>A contractor provides the goods and services within normal business operations, to many different purchasers. The goods or services are ancillary to the operation of a State or Federal program.</p> <p>Operates in a competitive environment.</p>
<p>Performance is measured against whether the objectives of the Federal program are met</p>	<p>Performance is measured against whether it meets contract specification.</p>
<p>Has responsibility for adherence to applicable Federal program compliance requirements. Must submit periodic progress reports.</p> <p>The Grantee must monitor the subrecipient to ensure funds are property used.</p>	<p>Has responsibility for adherence to applicable Federal program compliance requirements, depending on the project scope. Must submit periodic progress reports.</p> <p>The Grantee must monitor the contractor to ensure funds are property used</p>

4. Assessing Monitoring Need and Developing The Monitoring Plan

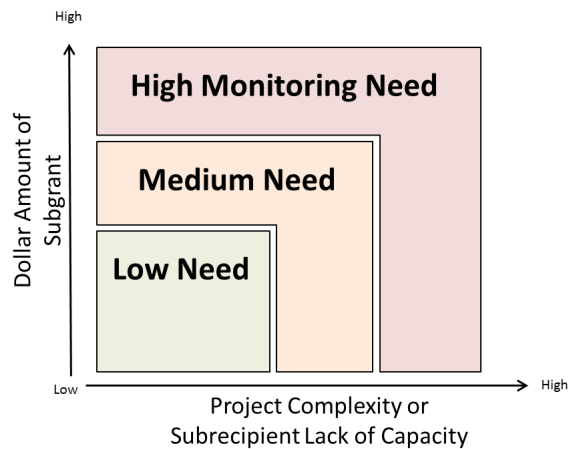
A risk-based approach to monitoring will be undertaken to ensure appropriate scrutiny of FTA subrecipients while maximizing the effectiveness of limited monitoring resources. A range of risk indicators will be used to identify the level of monitoring need for the subrecipient, which in turn will determine the Subrecipient Monitoring Plan schedule. The Monitoring Plan is a living document that should be maintained and updated to reflect any changes in situation or assessment of subrecipients. The Grant Compliance Office within the Government Relations Division is responsible for developing, maintaining, and implementing the Monitoring Plan.

Assess Monitoring Need

The Grant Compliance Manager, in coordination with the Project Manager, will assess the level of risk associated with each FTA subrecipient or project that they are responsible for, based on:

- The dollar amount of the subgrant
- The project size and complexity
- The capacity of the subrecipient
- The status of the federal grant (open or closed)

The following matrix is used to develop results, based on the completion of the FTA Subrecipient Monitoring Needs Assessment.



A variety of indicators should be used to assess the project complexity or subrecipient capacity. These are summarized in the table below. The Subrecipient Monitoring Needs Assessment (Appendix A) uses multiple choice questions based on these indicators to assess the project complexity and subrecipient capacity and thereby determines the level of monitoring needed.

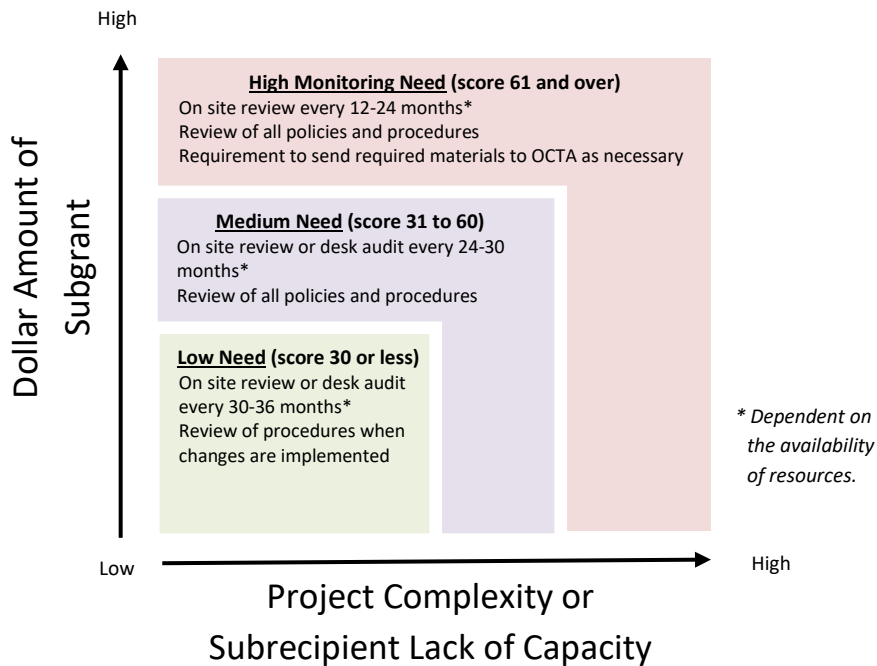
Project Complexity	Subrecipient Capacity
<ul style="list-style-type: none"> • Length of project • Tight project timelines • Large number of agencies involved that require coordination • Changes in scope of activities • Complexity of program funding/ match requirements • Fixed Route • Paratransit 	<ul style="list-style-type: none"> • Size of subrecipients' Federal award portfolio • Years of experience with managing state or federal funds, and with specific grant program and/or project • Prior findings as identified in audits, federal program monitoring, grantee monitoring • Timeliness in document submission and response to questions • History of non-compliance • History of issues in delivery • Management or staff turnover and experience • Systems for monitoring and keeping records of funds • Stakeholder complaints

The Subrecipient Monitoring Needs Assessment (Appendix A) should be completed by the Project Manager for each subrecipient at the start of the grant cycle when FTA subrecipients are identified, before any funding agreements are made, and/or annually on an as-needed basis. This is an internal planning document for use in assessing the frequency and approach of subrecipient monitoring activity.

After compiling the questionnaire, the Project Manager will total the scores to establish the subrecipient monitoring level needed. The results will be used to determine the annual plan for recipient monitoring, formal reviews and on-site visits

Subrecipient Questionnaire Score	Monitoring Need
Less than or equal to 40	Low
41-60	Medium
Greater than 60	High
Automatic High Level, regardless of overall score	
A score of 5 on any of the following questions - Section II Q 1 or 4, Section V Qs 1, 2 or 3, Section VI, Q 1: <ul style="list-style-type: none"> No previous experience as FTA subrecipient Material Findings from previous audits No financial management systems in place Drawdown or Invoicing restrictions Consistently late on some or all document reporting 	High

FTA subrecipients that will have a greater level of oversight and more frequent and active monitoring, as outlined in the chart below.



The intensity and frequency of the monitoring is highly dependent on availability of resources, including budgetary constraints and staffing. Detailed descriptions of these monitoring activities can be found in Section 5. Monitoring Process.

The Grants Compliance Office and Project Manager will discuss the findings of the Monitoring Needs Assessment and agree to any changes to the monitoring plan where necessary. The Project Manager will notify the FTA subrecipient of the monitoring schedule so they are aware of what is planned. The Grant Compliance Manager may notify the subrecipient upon request by the Project Manager

All Monitoring Needs Assessments will be kept with the Grant Compliance Office for tracking, reporting and historical assessment information.

Develop FTA Subrecipient Monitoring Plan

The FTA Subrecipient Monitoring Plan provides the approach and schedule for monitoring activities for all subrecipients of FTA funds. It contains:

- Policies and procedures that guide the scope and frequency of monitoring activities and corrective actions (*this document*)
- The total FTA subrecipient contract population, including Monitoring Need Assessment
- Monitoring schedule of desk and on-site reviews
- Monitoring checklists - Invoice Review Checklist Sample (Appendix B), Quarterly Report Sample (Appendix C), FTA Subrecipient Review Guide (Appendix D), Capital Project Checklist Sample (Appendix M)
- Summary of findings from previous monitoring cycle and any corrective actions being implemented.

The FTA Subrecipient Monitoring Plan is managed and updated by the Grant Compliance Office, with input from the Project Managers within the Implementing Divisions. It should be reviewed and approved by the Executive Director of Government Relations.

5. Monitoring Process

The monitoring process incorporates the full cycle of grants for subrecipient monitoring. The approach emphasizes both advising the subrecipient of their responsibilities, assessing compliance, and providing guidance as needed.

The subrecipient monitoring process will consist of the following activities:

1. Subrecipient Identification and Monitoring Needs Assessment
2. Elaboration of FTA requirements and subrecipient guidelines
3. FTA subrecipient funding agreement execution
4. Ongoing FTA subrecipient monitoring including certifications, assessments and quarterly reporting requirements
5. Formal compliance reviews, which includes desk and on-site reviews
6. Closeout

The specific tasks and responsibilities for each of these activities are noted below. The frequency of the different activities depends on the assessed monitoring level needed:

Monitoring Process Step		Low	Medium	High
1	Subrecipient Identification and Initial Monitoring Needs Assessment	All Subrecipients	All Subrecipients	All Subrecipients
2	Elaboration of FTA Requirements and Subrecipient Guidelines	All Subrecipients	All Subrecipients	All Subrecipients
3	FTA Subrecipient Funding Agreement Execution	All Subrecipients	All Subrecipients	All Subrecipients
4	Ongoing FTA Subrecipient Monitoring, including: 4.1 SAM Registry Checks	As-needed	As-needed (min. semi-annually)	As-needed (min. semi-annually)
	4.2 Quarterly Report Reviews	Sampling	Quarterly	Quarterly
	4.2 Invoice reviews	Sampling	Sampling	Monthly
5	Formal Compliance Reviews 5.1 Desk review of submitted documents	Annual Review only policies and procedures that have changed	Annual Review only policies and procedures that have changed	Annual Review only policies and procedures that have changed
	5.2 On Site Review	Every 30-36 months*	Every 24-30 months*	Every 12-24 months*
	5.3 Compliance Review Report	Modified version for desktop, full for on site	Modified version for desktop, full for on site	Modified version for desktop, full for on site
	5.4 Corrective Action Monitoring	Where necessary	Where necessary	Where necessary
6	Closeout	All Subrecipients at end of project	All Subrecipients at end of project	All Subrecipients at end of project

The sequencing of the Formal Compliance Reviews will depend on a number of factors:

- The level of monitoring need: High scoring projects should be prioritized within the Subrecipient Monitoring Plan.
- The duration of the subgrant or funding: Some subgrants may last less than a year. Where possible, oversight through a desk review should occur either during the grant agreement process or within the first quarter of the subgrant performance to allow sufficient time for corrective actions to be closed before the funding ends.

5.1 Subrecipient Identification and Initial Monitoring Needs Assessment

The Implementing Divisions will identify potential OCTA subrecipients and eligible projects for inclusion as needed in the Program of Projects (POP) and Program Management Plan (PMP).

With guidance from the Grant Compliance Office, a Monitoring Needs Assessment (Appendix A) will be completed by the Project Manager for each identified project and potential subrecipient. The assessment will identify the level of monitoring needed by each potential subrecipient, and any immediate action the subrecipient should undertake to enable better management of FTA funding. This can be undertaken

during project selection, or through information provided in solicitation responses. A desk review can be carried out by the Grant Compliance Office for medium or high scoring cases (see Section 5.5i). The Project Manager and the Grant Compliance Manager will determine whether an on-site visit will be performed. Compliance issues discovered at this stage should be addressed by the subrecipient before the funding agreement is executed.

5.2 Elaboration of FTA Requirements and Subrecipient Guidelines

The Grant Compliance Office will advise subrecipients of federal award information and compliance requirements prior to OCTA awarding or allocating FTA funds. This ensures that potential subrecipients understand the process and requirements before accepting an award of FTA funds. Information can be shared with the subrecipient through training and guidance available through FTA or OCTA resources and provided before a funding agreement is implemented.

This should be done during a call for project solicitation or during a pre-award review by the Implementing Division, with assistance from Contract Administration and Materials Management Department (CAMM) and Grant Compliance Office.

The information should include the following:

- CFDA title and number, award name, award number, and award year.
- OMB Circular No. A-133 Subpart D – Federal Agencies and Pass-Through Entities; A-Requirements of A-122 and 2 CFR 225 on eligible costs
- Requirements imposed by Federal laws, regulations, and the provisions of contracts or grant agreements as well as any supplemental requirements imposed by OCTA
- Applicable oversight areas
- Invoice submission requirements
- Oversight and monitoring documentation requirements

5.3 Subrecipient Funding Agreement Execution

CAMM will prepare and execute subrecipient funding agreements with all OCTA subrecipients of FTA funding. FTA requirements will be stated in the agreement along with the monitoring plans in keeping with 2 CFR 200.331 Requirements for Pass-through Entities to ensure that every subaward is clearly identified to the subrecipient as a subaward along with the requirements imposed as part of the federal award. The Implementing Division and Grant Compliance Office should review the funding agreement to ensure all applicable compliance requirements are reflected. At the time of agreement execution, the subrecipient will agree to comply with all applicable FTA requirements and to be subject to ongoing monitoring by OCTA as described herein.

i) Pre-Award Review

Utilizing the DUNS identification number and/or CAGE Code of the subrecipient entity, the Grant Compliance Office shall conduct a pre-award check using the System for Award Management (SAM) System to ensure the subrecipient organization has maintained an active registration and is not

debarred or suspended and is free of exclusions. Should issues arise, CAMM and the project management team shall be notified.

ii) Entity Information

The Grant Compliance Office will maintain all pertinent information about each subrecipient including entity identification numbers (DUNS and/or CAGE Codes), contact information, source and amount of funds, and summary project information for inclusion into required FTA reports. All relevant information relating to the oversight of each FTA subrecipient should be maintained in such a manner as to be easily and quickly identified, complete, and readily available for use.

5.4 Ongoing FTA Subrecipient Monitoring

The Grant Compliance Office will track and provide assurance of FTA subrecipient monitoring activities through the monitoring plan. Monitoring activities will be completed by Implementing Divisions and in-house compliance experts providing support in their functional areas. These activities include reviewing and quarterly Milestone Progress Reports and Federal Financial Reports, conducting formal on-site compliance reviews, site visit certifications, and managing closeout activities. The divisions involved in different monitoring activities are outlined in the section below and summarized in Section 8 Roles and Responsibilities.

i) SAM Registry Checks

In keeping with 2 CFR Part 200, the Grant Compliance Office will ensure that subrecipients maintain an active System for Award Management (SAM) registration with current information. SAM registration checks are to be conducted every six months and on an as-needed basis to ensure active SAM registrations are maintained and free of issues. The Grant Compliance Office will maintain a database of entity information and registration expiration dates and notify subrecipients of inactive or expiring registrations through the Project Manager.

ii) Quarterly Reporting

The Project Manager will review program progress on a quarterly basis using the Quarterly Monitoring Report (Appendix C). The Project Manager will request and/or complete relevant supporting documentation as required and clarify any information with the subrecipient if necessary.

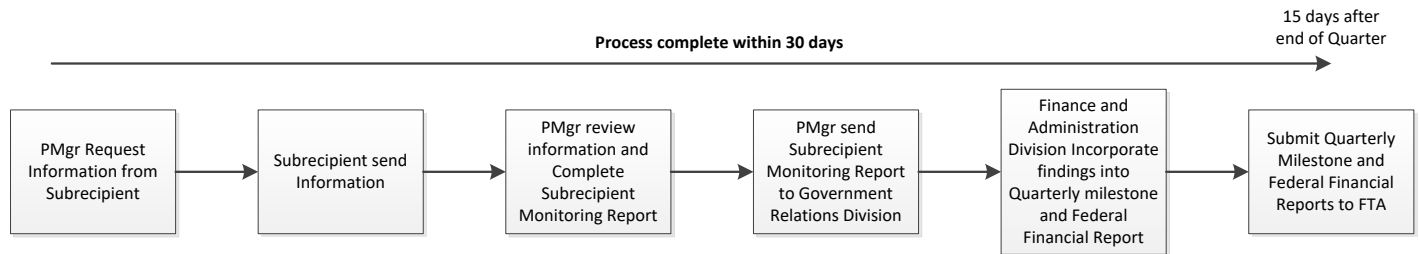
The Monitoring Quarterly Report will be reviewed by the Project manager for completeness and accuracy and sent to the Finance and Administration Division for inclusion in the required quarterly Milestone Progress Report and Federal Financial Report to be submitted to FTA.

The report should include:

- Project Schedule including original and current completion dates

- Funding table, original planned allocation, current estimates, actual expenditures, and remaining allocation. Identification of potential challenges or issues associated with project delivery

Quarterly Subrecipient Monitoring Process



iii) Invoice Reviews

The Project Manager within the Implementing Division will review all FTA subrecipient requests for reimbursement using an Invoice Review Checklist. A sample checklist is provided in Appendix B. Use of a checklist will help ensure all required supporting documents are submitted and that all requests are eligible for reimbursement using FTA funds.

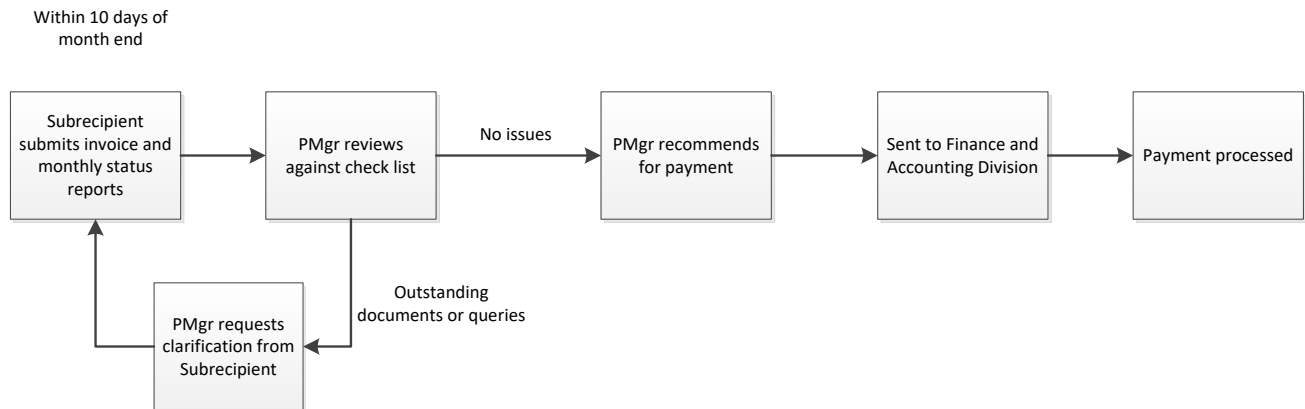
All invoices will be reviewed to ensure only eligible expenses are charged to FTA grants. If indirect costs are invoiced, the subrecipient must have had prior approval and an approved Cost Allocation Plan (CAP). More detailed notes about allowable costs and CAP approval are provided within Appendix P.

Once reviewed and approved invoice requests will be sent by the Project Manager to Finance and Administration for payment processing.

Recommended Support Documentation:

- Detailed Project Description (First invoice only)
- Invoice
- Vendor/Contract Invoices
- Cancelled Checks or Proof of Payment with Payment Date
- Operating costs from Ledger in Financial system
- Council Action approving Contract (First Invoice Only)
- Cost Estimate Update (First Invoice Only)

Invoice Review Process



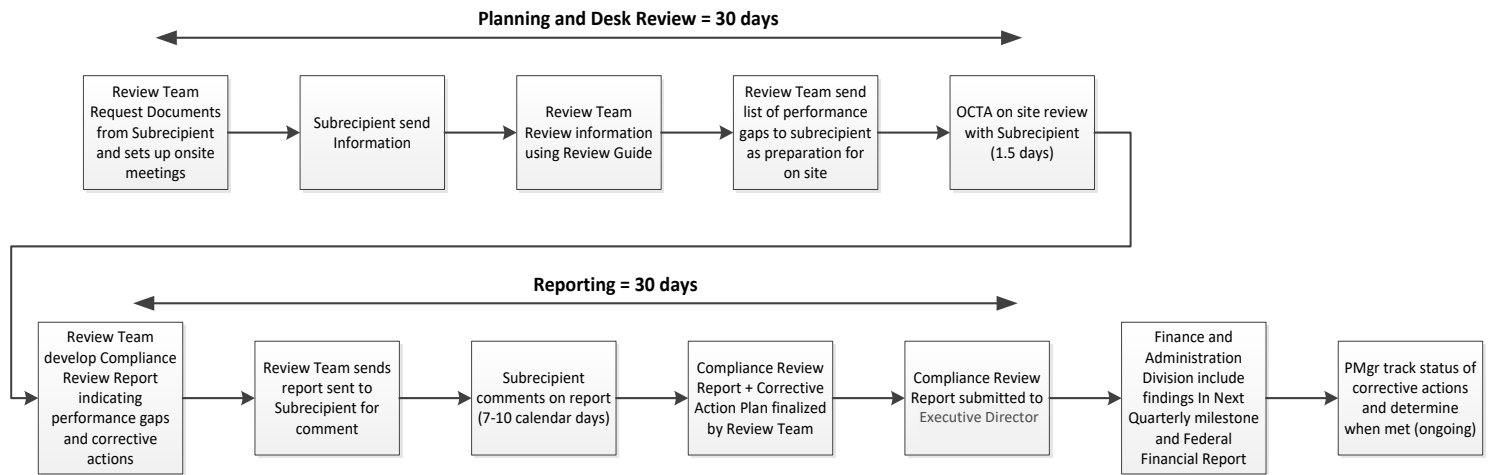
5.5 Formal Compliance Reviews

All FTA subrecipients shall receive a desk top review and a formal on-site compliance based on the level of risk using the Subrecipient Review Guide outlined in this Monitoring Plan. The Site visit review frequency will be based on the level of monitoring by each subrecipient or subgrant as outlined in Section 4. Subgrants operating for one year or less will receive a site visit before, or within the first quarter after commitment of the funding agreement. This ensures there is enough time for any corrective actions to be delivered during the course of the subgrant.

These reviews will consist of the following activities:

- i. Desk Review of Submitted Documents
- ii. On-Site Review
- iii. Compliance Review Report
- iv. Corrective Action Monitoring

Formal Review Process Desk and On Site Review



All FTA subrecipients will be assessed in the areas of financial management, financial capacity, technical capacity, satisfactory continuing control, Title VI, procurement, drug free workplace, planning/ program of projects and DBE for compliance with FTA requirements. In some cases, the review may consider these areas due to the lack of applicability at the subrecipient. The remaining areas to be reviewed will be based on the size of the grant or cooperative agreement, service complexity, and type of subgrant as indicated in the following chart:

Compliance Area	Capital Projects	Transit	Planning	JARC and New Freedom
Financial Management and Capacity	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Legal	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Technical Capacity	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Satisfactory Continuing Control	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Title VI	All subrecipients	All subrecipients	All subrecipients	All subrecipients
Procurement	All subrecipients	All subrecipients	All subrecipients	All subrecipients
DBE	All subrecipients with over \$250K in FTA contracting opportunities	All subrecipients with over \$250K in FTA contracting opportunities	All subrecipients with over \$250K in FTA contracting opportunities	All subrecipients with over \$250K in FTA contracting opportunities
Maintenance	All subrecipients with FTA funded facilities	All Subrecipients with FTA funded rolling stock or FTA funded facilities	All subrecipients with FTA funded facilities	All Subrecipients with FTA funded rolling stock or FTA funded facilities

Compliance Area	Capital Projects	Transit	Planning	JARC and New Freedom
ADA	All subrecipients with FTA funded facilities	All subrecipients operating fixed route services		All subrecipients operating fixed route or demand response
Half Fare		All subrecipients operating fixed route services		All subrecipients operating fixed route services
Charter Bus		All subrecipients operating Charter services		All subrecipients operating Charter services
School Bus		All subrecipients operating School bus services		All subrecipients operating School bus services
Drug free workplace and drug and alcohol program	All subrecipients with safety sensitive employees	All subrecipients with safety sensitive employees	Drug free workplace	All subrecipients with safety sensitive employees
EEO	All subrecipients with 50 or more transit related employees and either requests or received in excess of \$1M in capital and/or operating assistance or requests or receives in excess of \$250K in planning assistance.	All subrecipients with 50 or more transit related employees and either requests or received in excess of \$1M in capital and/or operating assistance or requests or receives in excess of \$250K in planning assistance.	All subrecipients with 50 or more transit related employees and either requests or received in excess of \$1M in capital and/or operating assistance or requests or receives in excess of \$250K in planning assistance.	All subrecipients with 50 or more transit related employees and either requests or received in excess of \$1M in capital and/or operating assistance or requests or receives in excess of \$250K in planning assistance.
Public Comment		All subrecipients operating fixed route services		All subrecipients that have potential for changes
Planning/Program of Projects	All subrecipients	All subrecipients	All subrecipients	All subrecipients

Subrecipients will be reviewed against the FTA requirements for each area as outlined in the table below. The Subrecipient Review Guide can be found in Appendix D.

Compliance Area	Basic Requirement (Based on 2014 Triennial Review Guidance)
Financial Management and Financial Capacity	The subrecipient must demonstrate the ability to match and manage FTA grant funds, cover cost increases and operating deficits, cover maintenance and operational costs for FTA funded facilities and equipment, as well as conduct and respond to applicable audits.

Legal	The subrecipient must comply with restrictions on lobbying requirements
Technical Capacity	The subrecipient must be able to implement FTA funded projects in accordance with the grant application, Master Agreement, and all applicable laws and regulations, using sound management practices.
Satisfactory Continuing Control	The subrecipient must ensure that FTA-funded property will remain available to be used for its originally authorized purpose throughout its useful life until disposition.
Title VI	The subrecipient must ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participating in, or be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance without regard to whether specific projects or services are federally funded. The subrecipient must ensure that federally supported transit services and related benefits are distributed in an equitable manner.
Procurement	Subrecipients use their own procurement procedures that reflect applicable state and local laws and regulations, provided that the process ensures competitive procurement and the procedures conform to applicable federal law, including 49 CFR Part 18 (specifically Section 18.36) and FTA Circular 4220.1F, "Third Party Contracting Guidance."
DBE	The subrecipient must comply with 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. Subrecipients also must create a level playing field on which DBEs can compete fairly for DOT-assisted contracts.
Maintenance	Subrecipients must keep federally funded vehicles, equipment, and facilities in good operating condition. Subrecipients must keep ADA accessibility features on all vehicles, equipment and facilities in good operating order.
ADA	Titles II and III of the Americans with Disabilities Act of 1990 (ADA) provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.
Half Fare	For fixed route service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual presenting a Medicare card during off peak hours will not be more than one half the peak hour fares.
Charter Bus	Subrecipients are prohibited from using federally funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Subrecipients are allowed to operate community based charter services excepted under the regulations.
School Bus	Subrecipients are prohibited from providing exclusive school bus service unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service. School tripper service that operates and looks like all other regular service is allowed.
Drug free workplace and drug	All subrecipients are required to maintain a drug-free workplace for all employees and to have an ongoing drug-free awareness program. Subrecipients receiving Section 5307, 5309 or 5311 funds that have safety-

and alcohol program	sensitive employees must have a drug and alcohol testing program in place for such employees.
EEO	The subrecipient must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving federal financial assistance under the federal transit laws. (Note: EEOC's regulation only identifies/recognizes religion and not creed as one of the protected groups.)
Public Comment	Section 5307 subrecipients are expected to have a written, locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.
Planning/Program of Projects	<p>Planning: The subrecipient must participate in the transportation planning process in accordance with FTA requirements, MAP-21, and the metropolitan and statewide planning regulations.</p> <p>Human services transportation: Subrecipients must participate in a coordinated public transit-human services transportation planning process that identifies the transportation needs of individuals with disabilities, older adults, and people with low incomes; provides strategies for meeting those local needs; and prioritizes transportation services for funding and implementation.</p> <p>Program of Projects (POP): Each recipient of a Section 5307 grant shall develop, publish, afford an opportunity for a public hearing on, and submit for approval, a POP.</p>

Formal Compliance Reviews will be undertaken by a Review Team. The Review team membership will include a Lead Reviewer from the Grant Compliance Office, the Project Manager and specialists from different Divisions as needed. The Review team members will vary between subrecipients depending on resource availability, type of project, and the level of monitoring needed. The Grant Compliance Office is to ensure that members from the relevant divisions and in-house experts are engaged appropriately.

A review team may consist of

- Grant Compliance Office Lead Reviewer
- Project Manager
- Members of F&A, Grants, Procurement/ DBE, Operations, HR/ D&A as required
- Other internal subject matter or compliance experts as required (e.g. in ADA, Title VI, DBE, Procurement, Maintenance)

i) Review of Submitted Documents

The initial desk review of a new subrecipient should assess all documentation. Thereafter, only new or amended policies and procedures need to be reviewed. For medium or high monitoring requirements, FTA subrecipients, or those whose funded project lasts less than a year, the first review may occur before, or within the first Quarter after execution of the subrecipient funding agreement. For all others the first desk review would be within the first year of the funding agreement.

The level of detail will depend on the determined monitoring needed for the subrecipient, as outlined in the previous sections. For subrecipients with low levels of monitoring needed, only new or amended policies and procedures need to be reviewed. For all other subrecipients, all policies and procedures should be reviewed.

The steps are outlined below:

- **Information Request:** The Review Team will request the relevant documents from subrecipients, based on the Subrecipient Review Guide (Appendix D). The Compliance Review Document List (Appendix E) outlines the relevant documents. A draft letter requesting information can be found in Appendix F. The Subrecipient should be given around 2-3 weeks to collect and submit the required documents.
- **Documentation Review:** The Review team will review the documentation against the Subrecipient Review Guide (Appendix D). Additional documentation or clarification requests may be required.
- **Compliance Review Report:** The Compliance Review Report will be drafted by the Review Team Leader based on the findings, including any corrective actions required (Appendix J). This is outlined in Section 5.5 iii.
- **Updating the monitoring plan:** The Monitoring Needs Assessment Questionnaire (Appendix A) should be updated by the Project Manager based on the review findings, and on an annual basis.

Before On-site Review

- **Information Request:** The Review Team will request relevant documentation at least 4 weeks in advance of the site visit based on the requirements listed in the Subrecipient Review Guide (Appendix D). The Compliance Review Document List (Appendix E) indicates the relevant documents for each area. The requested documents will be determined by the review areas applicable to each subrecipient. A draft letter requesting the information can be found in Appendix G. The Subrecipient should be asked to return the documents at least 2 weeks before the site visit to allow time for review.
- **Review Documentation:** The Review Team will review all submitted documents using the Subrecipient Review Guide (Appendix D). This can record which documents were received and if there were performance or information gaps exist in meeting the FTA requirements

in each area. Questions or areas to follow up on site can be indicated in the 'comments' sections.

Pre-visit information: At least 1 week before the site visit the Review Team should send the Subrecipient the following:

- Cover Letter (Appendix H)
- Draft Subrecipient Review Guide. This outlines the documents that were received and areas that will be further investigated onsite, a list of performance or information gaps in advance of the site visit, to allow the subrecipient to prepare for onsite discussions with OCTA staff.
- The program for the on-site review to ensure that all relevant staff members are present
- The chosen sample of procurement files, so that the Subrecipient will ensure all the documentation is ready for review on site.
- The procurement file review checklist (Appendix I) to help their preparation of the files.

ii) On-Site Review

The Review Team will coordinate the on-site reviews using the FTA Subrecipient Review Guide (Appendix D). It is expected that 2 or more staff will attend onsite to conduct the review based on the results of the desk review and resource availability. The Review team will choose the individuals that attend each review based on the skills and expertise required for that subrecipient or project. For example, an ADA subject matter expert might attend if the desk review showed missing ADA information or issues regarding ADA requirements.

The on-site reviews will concentrate on performance gaps identified during the pre-site visit documentation review, changes in policies and procedures, risk-based assessment of grant management areas, and federally funded procurements.

The on-site reviews will last approximately 1 or 2 days and will cover the following activities:

- **Entrance Conference** – The first meeting of the site visit between the Review team and subrecipient.

The Review team should introduce themselves, present an overview of the compliance review objectives and process, and confirm arrangements for the review (documents requested, staff interviews, projects or federally funded assets to be inspected,). The subrecipient should have the opportunity to raise any issues they would like to discuss. Appendix N is a template for the Entrance Conference Presentation.

- **Interviews and Review of Outstanding documentation** - Covering any outstanding questions or gaps from the desk review.

- **Visit and Inspect Federally Funded Facilities, Vehicles and Other Major Assets** - Including, observing the condition of facility and equipment, reviewing preventative maintenance records for a sample of federally funded revenue vehicles and facilities, verifying that the subrecipient has equipment control procedures and reviewing procurement files and other documentation to confirm that the subrecipient has effective and comprehensive oversight procedures.
- **Capital projects monitoring** – Where the FTA subrecipient is delivering a capital project, the Review team should investigate that the subrecipients are adequately managing and monitoring their projects and contractors, and that the required Quality Assurance controls are in place. See Section 7 ‘Ongoing Capital Project Oversight’ below.
- **Preliminary findings of deficiency** – During the review, the Review Team should use the FTA Subrecipient Review Guide (Appendix D) to check all FTA requirements and tabulate the findings within the Exit Conference template (Appendix O). This will help to identify the preliminary findings and ensure all areas are covered while on site.
- **Exit Conference** – the site visit will conclude with an exit conference during which the Review Team will debrief the subrecipient team.

At the exit conference, the preliminary findings of the deficiency will be distributed by the Review Team and discussed with the subrecipient along with proposed corrective actions and milestones for completion. The subrecipient should advise if any comments have been misstated or if there may be obstacles to the implementation of corrective actions.

Appendix O contains a template for the exit conference. The table below indicates the headings used to document findings and an example finding.

Area	Finding	Deficiency	Corrective Action	Response Date
Financial Management & Capacity	Finding	No existing financial plan.	The subrecipient must submit a multi-year financial plan.	10/17/2023

Findings can take a number of forms:

- **‘No finding’**: Subrecipient documentation meets FTA requirements
- **‘Finding’**: Subrecipient is missing documentation or the documentation provided is missing key FTA requirements
- **‘Open Action Items’**: Subrecipients have not yet had to comply with particular Federal Requirements, but will need to do so in the future. For example, a facility capital project does not need a facility or equipment maintenance program during building phases, but the subrecipient should submit a program to OCTA before the facility is operational.

- **‘Not Applicable’:** An area can be deemed not applicable if, after an initial assessment, the subrecipient does not conduct activities for which the requirements of the respective area would be applicable

Each finding will be accompanied by a corrective action that must be completed by the subrecipient to bring the project into compliance with FTA requirements. The corrective actions, along with timescales for completion, form a corrective action plan which the subrecipient will be monitored on. Corrective actions could include developing new policies and procedures, training staff, and monitoring of staff performance to ensure compliant policies are followed. The FTA Subrecipient Review Guide (Appendix D) provides suggestions of corrective actions for each finding.

Corrective actions should be specific, measurable, assignable to the subrecipient and ensure the deficiency is removed. The timescale given for the corrective action should be realistic but enable the deficiency to be removed as quickly as possible. All corrective actions should be completed within 90 days of the date of the final report.

Some findings may be historic one-off events, for example not completing an equity analysis for a past fare or service change. As it is too late to undertake the analysis as the change has occurred, the subrecipient should instead be asked to submit procedures ensuring the requirement is not missed in the future. If this is done, the finding will not be carried in future compliance reviews.

iii) Compliance Review Report

Based on the findings noted in the Exit Conference, the Review Team Leader will develop a report indicating any performance gaps identified in the relevant compliance areas as a result of the review (Appendix J).

The subrecipient will be sent the FTA Compliance Review Report and corrective action plan and should be given 10 business days in which to comment on the corrective actions planned or recommended. Appendix K provides a letter template to send recipients with the draft report. Amendments to the FTA Compliance Review Report can be agreed by the Project Manager where necessary.

The FTA Compliance Review Report will be presented to the Executive Director of Government Relations prior to transmittal to the subrecipient.

The Grant Compliance Office will keep a copy of the FTA Compliance Review Report and action plan. Findings should be sent to the Finance and Administration Division to be incorporated into the FTA Quarterly Reports.

iv) ***Corrective Action Monitoring***

The Project Manager will be responsible for tracking the status of all corrective actions and determining when all corrective action requirements have been met within the agreed timeframe. Progress should be reported to the Grant Compliance Office and the FTA Subrecipient Monitoring Plan updated if additional oversight is necessary. If a subrecipient does not deliver the corrective actions in the agreed timeframe, future payments may be withheld or additional funding may not be provided.

5.6 Closeout Reviews

Grant closeout is the term used to signify the process by which FTA determines that all activities in a grant are complete and Federal funds have been expended.

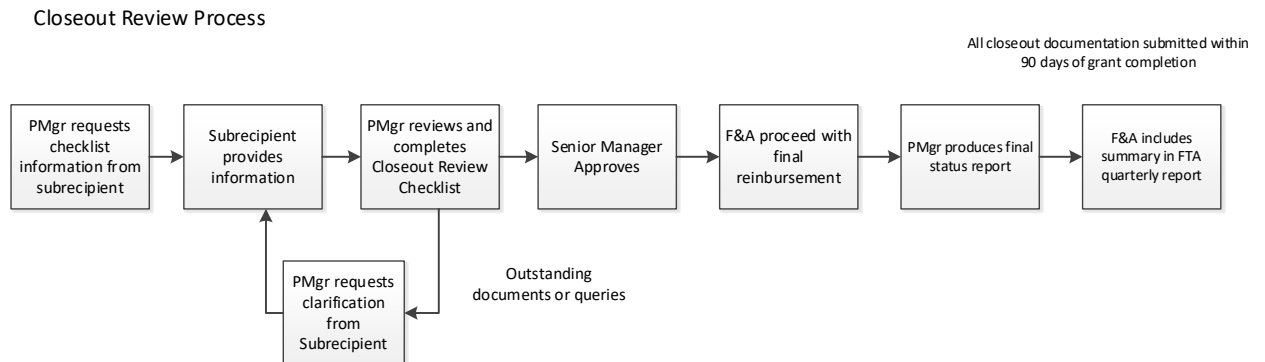
The Project Manager will conduct a formal Grant Closeout Review prior to closing out any FTA subrecipient cooperative agreement. This ensures all program requirements have been met and properly documented, and that all requests for reimbursement have been processed. Final reimbursements will be held until subgrant closeout has been initiated.

The Government and Relations Team seek assurance from the Finance and Administration Division that FTA grant status is being monitored on a quarterly basis and the closeout procedure is initiated for all FTA grants that meet any of the following criteria:

- Draw-down of the grant has been completed to \$0.
- All required performance elements have been completed.
- The grant was obligated more than three years before and has not had a disbursement within the past 12 months. Grants that have been inactive for a substantial period of time should be closed unless a reasonable explanation can be provided, and activity is likely to resume soon.

All closeout documentation must be submitted within 90 days of the completion of all activities in the grant. A Closeout Checklist should be completed by the Project Manager (Appendix L).

The results of the closeout review will be documented in a final status report for the project/subrecipient. A summary of the closeout activity will be included in the FTA quarterly reports.



6. Oversight after grant closeout

FTA maintains an interest in assets (property and equipment) that have been funded by FTA grants until disposition. OCTA Project Managers should be cognizant of FTA requirements that may extend beyond grant closeout, such as maintenance, and continuing control (e.g. use of the property and disposition), where relevant Project Managers may wish to request annual certifications of use, maintenance procedures and inventories, and/or undertake site visit inspections. The requirements for post-closeout oversight should be identified on a subgrant by subgrant basis and included within the OCTA FTA subrecipient monitoring plan.

7. Ongoing Capital Project Oversight

As the recipient of federal funds, OCTA is fully responsible for the development and implementation of a capital transit project. This includes planning, design, bidding contracts, supervising, administering, inspecting and accepting construction, performing testing and start up.

It is the FTA subrecipient’s responsibility to monitor its contractors appropriately. This should be made clear at the start of the project (Elaboration of FTA Requirements and Subrecipient Guidelines).

The FTA provides oversight through its own staff and Project Management Oversight Contractors (PMOC) to ensure that FTA funded transit projects are implemented responsibly and project is progressing in accordance with specifications, special provisions and plans and the methods and practices specified in construction manuals alongside FTA requirements. The PMOC guidelines can be used to highlight the requirements for subrecipient oversight on a capital project.

As part of OCTA’s subrecipient monitoring program, the Project Manager and Grant Compliance Office staff should ensure that subrecipients are adequately monitoring their projects and contractors, and that the required Quality Assurance controls are in place. These can be determined through an ongoing assessment of the areas listed below, using the Capital Project Oversight Checklist (Appendix M).

<p>Project management:</p> <ul style="list-style-type: none">• Project/ Program Management• Document Management• Procurement and Financial Management• Project Schedule and Milestones• On-site Monitoring and Reporting• Safety, Security and Emergency Oversight• Change Management• Risk Management• Design Control Documentation• Quality Assurance/ Quality Control• Communication• Fleet Management	<p>Contractor compliance:</p> <ul style="list-style-type: none">• Construction Administration Documentation• Labor Compliance – including Davis Bacon• Progress Measurement and Payment• EEO/ Wage Rate Posters• Buy America• Technical Capacity• DBE
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The Capital Project Oversight Checklist can be used at several review points. At a minimum it should be used after the first Quarter of a contract, as part of the Quarterly Reporting undertaken by the Project Manager. If there were delays starting work with contractors on site, the checklist should be re-visited by the Project Manager at the next Quarterly Report once work on site has begun. Use techniques such as earned value to check schedule and budgeting progress through subsequent Quarterly Reports.

Most of the checklist can be covered through reviewing subrecipient documentation. Additional documentation may be required to review project specific requirements as listed in the funding agreement.

Certain areas of Capital Project Oversight Checklist require a site visit to review. For example:

- Davis-Bacon compliance - Spot check construction logs/ diaries against certified payrolls
- EEO/ Wage Rate – check posters clearly visible on construction site
- Compliance with Buy America - Check construction area and contractors yard. Check all pre and post-delivery certifications
- Use of DBE contractors - Check on site use is in accordance with subrecipient comments / practice on site.
- Sample of contract files
- Checks on other construction administration and contractor oversight files such as risk assessments, inspection and testing reports, design drawings

These areas are covered in the Subrecipient Review Guide (appendix D), for use during the onsite formal compliance review (see Section 5.5)

In addition to the formal compliance reviews, it is recommended that Project Managers make regular, short construction site visits in order reinforce OCTA interest in the project and view progress personally. The frequency of such visits (weekly, monthly, and quarterly) will depend on the stage of the project, level of activity on the construction site and monitoring need associated with the subrecipient.

If the Capital Project Oversight Checklist identifies non-compliance, the subrecipient should be made aware of the issue and a corrective action plan agreed upon with OCTA. This can be documented and monitored through the FTA Compliance Review Report (Appendix J), Quarterly Reporting (Appendix C) and more ongoing capital project oversight as determined by the Project Manager.

8. Roles and responsibilities

Role	Responsibilities
Grant Compliance Office	<ul style="list-style-type: none"> • With the Implementing Divisions, identify potential OCTA subrecipients and eligible projects • Provide assistance to Implementing Division when advising subrecipients of FTA requirements (at project solicitation or pre-award audit) • Maintain information on Subrecipients for inclusion in FTA reporting

	<ul style="list-style-type: none"> • Maintain and update Subrecipient Monitoring Plan, track subrecipient monitoring activities. • Lead Review Team to undertake formal compliance reviews. Agree with Project Manager Review Team membership. Responsible for developing Site Visit Compliance Review Report. • Provide compliance guidance and training to OCTA staff members
Contracts Administration & Materials Management (CAMP)	<ul style="list-style-type: none"> • Prepare funding agreement for FTA subrecipients • Provide assistance to Implementing Division when advising subrecipients of FTA requirements (at project solicitation, pre-award audit, through the useful life of the project or asset)
Finance and Accounting Division (F&A)	<ul style="list-style-type: none"> • Manages the Quarterly FTA reporting process (MPR, FFR). Develop quarterly FTA reports using information provided by Project Manager and Grant Compliance Office • May form part of Review Team for Formal Compliance Reviews depending on specialist skills required (agreed separately for each subrecipient)
Implementing Divisions (including Project Manager)	<ul style="list-style-type: none"> • Identify potential OCTA subrecipients and eligible projects for FTA grant funds • Include projects in the Program of Projects (POP) and Program Management Plan (PMP) as needed. • Undertake Monitoring Needs Assessments • Review funding agreement • Undertake Invoice Reviews • Undertake Quarterly Reviews • Participate in Review Team for Formal Compliance Reviews • Monitor Corrective Action Plan • Undertake Capital Project Monitoring (as necessary)
Other Divisions (e.g. Grants, Procurement, Operations, HR/D&A)	<ul style="list-style-type: none"> • May form part of Review Team for Formal Compliance Reviews depending on specialist skills required (agreed separately for each subrecipient)
In House Compliance Experts	<ul style="list-style-type: none"> • May form part of Review Team for Formal Compliance Reviews depending on specialist skills required (dependent on subrecipient)
Executive Director of Government Relations	<ul style="list-style-type: none"> • Approve Subrecipient Monitoring Plan • Review Formal Compliance Review Reports and Corrective Action Plan

The following table provides a responsibility matrix outlining the teams involved in different areas.

R (Responsible/ Lead Activity)	C (Consulted/ Review Document)
A (Accountable/Formally Accept)	I (Informed)
S (Support/ Contribute)	

‘Other Divisions’ could include Procurement, Operations, HR/D&A, Grants, where their subject matter expertise is required.

Guide Section	Activity	When	Implementing Division	Grant Compliance Office	CAMM	F&A	Other Divisions	In House Compliance Experts	Internal Audit or Third Party	Executive Director
4	FTA Subrecipient Monitoring Plan	Ongoing - Maintained and updated	S	R						A
4	Database of FTA subrecipient information	Ongoing - Maintained and updated	S	R						
5.1	Subrecipient Identification	Opportunity identified, project solicitation	R	S		R				
5.1	Initial Monitoring Needs Assessment	Through solicitation response or pre-award audit	S	R						
5.2	Elaboration of FTA Requirements and Subrecipient Guidelines	Solicitation request or pre-award audit	R	S	S			S		
5.3	Subrecipient Funding Agreement	Before funding awarded	C	C	R					
5.4i)	Invoice Reviews	Monthly Review of Invoices	R	I		I				
5.4ii)	Quarterly Review of Subrecipients	Quarterly	R	I		I				
5.4ii)	Quarterly Reporting to FTA	Quarterly	S	S		R				
5.5i)	Request for documents	Before desk review of documentation (both annual and before site review)	S	R						
5.5i)	Review of Submitted Documents	At both annual desk review and before site review	S	R		where relevant	where relevant	where relevant		

Guide Section	Activity	When	Implementing Division	Grant Compliance Office	CAMM	F&A	Other Divisions	In House Compliance Experts	Internal Audit or Third Party	Executive Director
5.5i)	Compliance Review Report (desk review)	At annual desk review	S	R		I & involved where relevant	where relevant	where relevant		
5.5i)	Revise Monitoring Needs assessment	At annual desk review or after site visit	S	R						
5.5i)	Information Gap report and letter to subrecipients	After desk review before site visit	S	R		where relevant	where relevant	where relevant		
5.5ii)	On site review	Frequency determined by subrecipient and subgrant monitoring need level	S	R		where relevant	where relevant	where relevant		
5.5iii)	Compliance Review Report (site visit)	After site visit. Including comments from subrecipient	S	R		I & involved where relevant	where relevant	where relevant		A
5.5 iv)	Corrective Action Monitoring	If required	S	R		I				
5.6	Closeout Reviews	At end of project	R	S		I				
7	Capital Project Checklist	At first Quarterly Report and annually thereafter (at desk or site review)	R	S		I & involved where relevant	where relevant	where relevant		
	Audit of FTA Subrecipient Monitoring	Annual audit	I	I	I	I	I	I	R	I

9. References to Legislative and Regulatory Documents (or as revised)

- FTA Circular 5010.1D, “Grant Management Requirements”
- FTA Circular 4220.1F, “Third Party Contracting Guidance”
- FTA Circular 7008.1A, “Financial Capacity Policy”
- FTA Circular 4702.1B, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”
- 49 CFR 26
- OMB Circular A-133 Compliance Supplement 2014
- OMB 2 CFR Part 225 “Cost Principles for State, Local and Indian Tribal Governments”
- OMB 2 CFR, Part 230 “Cost Principles for Non-Profit Organizations”
- Urbanized Area Formula Funding program (49 U.S.C. 5307)
- Formula Grants For Other than Urbanized Areas (49 U.S.C. 5311)
- FTA Circular 9030.1E “Urbanized Area Formula Program” (MAP-21)
- Note: Guidance provided under the old circular 9030.1D will continue to apply to grants made with FY 2012 or earlier funds.
- State of Good Repair and Asset Management
- Job Access and Reverse Commute Program (49 U.S.C. 5316)
- New Freedom Program (49 U.S.C. 5317)
- Bus and Bus Facilities (49 U.S.C. Section 5339 / MAP-21 Section 20029)

10. Definitions

Capital Asset	Facilities or equipment with a useful life of at least one year, which are eligible for capital assistance.
Capital Lease	Any transaction whereby the subrecipient acquires the right to use a capital asset without obtaining ownership.
Corrective Action Plan	Developed when a review uncovers performance gaps. The subrecipient must implement corrective actions within an agreed timeframe to ensure compliance to FTA requirements.
Cost Allocation Plan (CAP)	A summary of the methods and procedures that an organization uses to allocate cost to a program, grant, contract or agreement. A subrecipient must have a CAP approved by OCTA to invoice indirect costs. They must have a plan for reviewing and revising the CAP and submit a CAP to OCTA annually.
Direct Costs	Direct costs are those that can be identified specifically with a particular final cost objective. For example, Cost of materials acquired, consumed or expended specifically for the purpose of the award,
Equipment	Equipment and other approved capital expenditures. An article of nonexpendable, tangible personal property having a useful life of more than one year and an acquisition cost which equals or exceeds the lesser of the capitalization level established by the governmental unit for financial statement purposes, or \$5,000. Includes rolling stock and all other such property used in the provision of public transit service.

Facilities	All or any portion of a building or structure including roads, walks, and parking lots.
Implementing Divisions	The Transit, Planning, and Capital Programs divisions are referred to as the Implementing Divisions.
Indirect Cost	Indirect costs are those included for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.
Project Activity Line Item (ALI)	The description and dollar amount contained in the budget for an approved grant activity associated within a particular scope approved as part of a grant. ALIs under each scope are informational and are used as tools for FTA and the grantee/subrecipient to manage the grant
Subrecipient Monitoring Plan	The approach and schedule for monitoring subrecipients. Including policies and procedures, subrecipient contract list with monitoring needs assessment, monitoring schedule, checklists and findings from previous monitoring cycle.
Subrecipient	A subrecipient is a State or local government authority, non-profit organization, or operator of public transportation services that receives a grant indirectly through a recipient. This guide is designed for subrecipients of FTA funds, received through OCTA.
Subrecipient Funding Agreement	Contractual document between OCTA and the subrecipient outlining the compliance requirements for the FTA funds, including the monitoring processes

11. Appendices

The table below contains a list of the tools and templates that accompany this procedure document.

A. FTA Subrecipient Monitoring Needs Assessment
B. FTA Subrecipient Invoice Review Checklist Sample
C. FTA Subrecipient Monitoring Quarterly Report Sample
D. FTA Subrecipient Review Guide
E. FTA Compliance Review Document Checklist
F. Letter to Subrecipients – Desk Review
G. Letter to Subrecipients – On-Site Review
H. Letter to Recipients – Pre-Visit
I. Procurement File Review Checklist
J. FTA Compliance Review Report
K. Letter to Subrecipients – Draft Compliance Report
L. FTA Subrecipient Closeout Review Checklist
M. Capital Project FTA Subrecipient Monitoring Checklist Sample
N. Opening Conference Template
O. Closing Conference Template
P. Allowable Costs and Cost Allocation Plan Review

Appendix A

FTA Subrecipient Monitoring Needs Assessment

FTA Subrecipient Monitoring Needs Assessment Questionnaire

This Monitoring Needs Assessment has been developed to determine the appropriate level of monitoring for each FTA subrecipient subgrant.

This form should be completed by the project manager at the start of the grant cycle when FTA subrecipients are identified, before any funding agreements are made, and then at least annually thereafter. The assessment should be revised in the event of significant changes to the subgrant or subrecipient operation. Information may need to be requested from the subrecipient directly. The Excel 'FTA Subrecipient Monitoring Needs Assessment' tool can be used to document the scores and calculate the level of monitoring needed.

The level of monitoring needed will influence the approach and frequency of OCTA monitoring activity. The project manager should send the Subrecipient Monitoring Needs Assessment to the Government Relations Division and agree on any amendments to the Subrecipient Monitoring Plan.

Instructions:

Each question is multiple choice, with a different score (1, 3, 5) for each answer option. Complete all questions and calculate the total score of all answers. The total score indicates the level of monitoring needed (high, medium or low) for the subrecipient subgrant. This is outlined on the last page of the assessment. Particular responses to certain questions lead to an automatic 'High' score. These are highlighted in red and identified with (*).

Where a question is N/A for the subrecipient or subgrant, score one (1). New or potential subrecipients may score one (1) in a number of areas as they have no proven record in reporting, FTA compliance and Federal Cost Principles.

I. Project Complexity	
1. What is the duration of the project?	
0-12 months	1
12-24 months	3
25 months and over	5
Comments:	
2. How many phases does the project have?	
One phase	1
Some phases	3
Many phases	5
Comments:	
3. How many contractors and/or subcontractors are involved in the project?	
One contractor	1
Some contractors and subcontractors	3
Many contractors and subcontractors	5

Comments:	
4. Complexity of the business environment or program funding/matching requirements:	
Simple program requirements and operations environment	1
Moderately complex program requirements and operations environment	3
Complex operations environment and program requirements	5
Comments:	
5. Has the project experienced changes in scope and schedule?	
No changes	1
A few minor changes in scope and schedule	3
Many changes in scope and/or schedule	5
Comments:	
6. Type of project	
All projects except those listed below	1
Large construction, Environmental, Coordinate with railroad; Design-build projects, Large BRT, New or Small Starts	5
Comments:	

II. General Assessment	
1. Subrecipient experience delivering an FTA Funded Subgrant: *	
5+ years	1
1-4 years	3
No previous experience as FTA subrecipient or recipient*	5
Comments:	
2. Management or staff turnover or reorganization that affects this project or program:	
No turnover or reorganization	1
Little turnover or reorganization	3
Significant turnover or reorganization	5
Comments:	
3. Experience of staff and management assigned to the program:	
5+ years/funding cycles	1
2-5 years/funding cycles	3
Less than 2 years/funding cycles	5
Comments:	

4. Subrecipient timeliness in document submission:*	
Applications, Amendments, Close-out Fiscal or Financial Reporting, Budgets/Revisions Monitoring document requests, Quarterly Reports A-133 audits and corrective action (if applicable)	
On time submission of all documents	1
Rarely late or sometimes late on some documents	3
Consistently late on some or all documents*	5
Comments:	
5. Subrecipient timely response to program/fiscal questions:	
Always timely in response	1
Sometimes late in response	3
Consistently late in response	5
Comments:	
6. Effective written procedures and controls for this program:	
Formal/Written and Distributed to Employees	1
Informal and Formal Policies and Controls	3
No or only informal Policies or Controls	5
Comments:	
7. Operates a fixed route service	
Substantial experience	1
Some experience	3
Little to new experience	5
Comments:	
8. Civil rights	
Has all plans written and endorsed/approved	1
Has some plans written and endorsed, some have questionable status	3
Has few civil rights plans written and approved/endorsed	5
Comments:	
9. Operates a Paratransit or Demand Response	
Substantial experience	1
Some experience	3
Little to new experience	5
Comments:	

10. Outsources transit services	
Has a written oversight plan	1
Has an informal and partially written plan	3
Has only an informal unwritten plan	5
Comments:	

III. Overall Fiscal Assessment	
1. Variations between expenditures and budget:	
No variations	1
Small variations	3
Large and frequent variations	5
Comments:	
2. Subrecipient amount of budget carryover year to year:	
No carryover	1
Small amount of carryover	3
Large amount of carryover	5
Comments:	
3. Difficulty meeting matching requirements:	
Always meets matching requirements (No difficulty)	1
Meets matching requirements most of the time (Some difficulty)	3
Consistently has difficulty meeting matching requirements	5
Comments:	

IV. Legal Assessment	
1. Does the subrecipient have or previously had a lawsuit(s) filed against them? (Obtain all necessary documentation if answer is yes)	
No previous or current lawsuits	1
Has previously had a lawsuit	3
Has a lawsuit	5
Comments:	
2. Subrecipient staff that have been jailed, convicted of a felony or are currently under criminal investigation:	
No staff jailed, convicted or currently under criminal investigation	1

Has staff that has been jailed, convicted or is currently under criminal investigation	5
Comments:	

V. Monitoring/Audit Assessment

1. Have there been material Audit findings from the A-133 Audit or any other Internal Audit:*

No material findings	1
Some findings, not material	3
Has material findings*	5

Comments:

2. Have there been any previous audit findings (i.e. other comprehensive audit, Internal Audit)?*

No material findings	1
Some findings, not material	3
Has material findings*	5

Comments:

3. Has the subrecipient been debarred or suspended or been on restricted drawdown? If so, when?*

Never debarred or suspended, restricted	1
Has been debarred or suspended, restricted*	5

Comments:

4. Corrective Action Plans (CAP) and Resolution (Obtain copy)

No outstanding CAPs past or current	1
Has had CAPs but some have been resolved on time	3
Has CAPs and most are not resolved on time	5

Comments

VI. Financial Systems Assessment

1. Does the sub-recipient have a financial management system in place to track and record program expenditures (Examples: QuickBooks, Visual Bookkeeper, Peachtree, or a Customer Proprietary System)?*

Yes, has financial management system in place	1
No financial management system in place*	5

Comments:

2. Does the accounting system identify the receipts, time and expenditures specific to grant funds, as well as the grant funded project?	
Accounting system identifies receipts, time and expenses of program funds separately for each grant fund and each grant funded project	1
Accounting system identifies receipts, time and expenses of program funds but does not separate for both grant funds and projects	3
Accounting system does not identify receipts, time and expenditures of program funds	5
Comments:	
3. Does the sub-recipient have a time and accounting system to track time and expenditures by cost objective?	
Yes, subrecipient has a time and accounting system to track time and expenditures by cost objective	1
Subrecipient has a time and accounting system but does not track time and expenditures by cost objective	3
Subrecipient does not have a time and accounting system to track time and expenditures	5
Comments:	

Once assessment is complete, total the scores to determine the Risk level using the table below.

Subrecipient Questionnaire Score	Monitoring Need	Total of score
Less than 30	Low	
31 to 60	Medium	
Greater than 60	High	
Automatic High Level, regardless of overall score		
<p style="color: red;">A score of 5 on any of the following questions - Section II Q 1 or 4, Section V Qs 1, 2, and 3, Section VI, Q 1</p> <ul style="list-style-type: none"> • No previous experience as FTA subrecipient • Consistently late on some or all document reporting • Material Findings from previous audits • Drawdown or invoicing restrictions • No financial management systems in place 	High	

Appendix B

FTA Subrecipient Invoice Review Checklist Sample

FTA Subrecipient Invoice Review Checklist Sample

Contract/Recipient Number	_____	Invoice Number	_____
Project Title	_____	Invoice Date(s)	_____
Subrecipient	_____	Invoice Value	_____
Purchase Order #	_____	Actual Local Match	_____ %
Contract Value	_____	Payments to Date	_____
Project Manager	_____	Division	_____

<i>Type of Contract</i>	<i>Payment Terms</i>	<i>Applicable Wage Rates</i>
<input type="checkbox"/> Fixed Price	Milestone <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Davis Bacon
<input type="checkbox"/> Fixed Unit Price	Progress <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> T&M	Emergency <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Construction Management Services		

1. Supporting Documentation			Comments
a. Project Description (Invoice #1)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
b. Project Location (Invoice #1)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
c. Project Site Photos (where applicable)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
d. Vendor / Contract Invoices	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
e. Purchase Orders	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

f. Cancelled Checks or proof of payment with payment date

Yes No
N/A

h. Operating costs

(from Ledger in Financial system)

Yes No

i. Cost estimate update

(Invoice #1)

Yes No
N/A

2. Invoice - Format as per Contract

Yes No

3. Review of Rates

a. Complies with Contract Pricing

Including Local Match Level

Yes No

b. Reflects Current Wage Rates

Yes No

4. Performance within Terms of Contract

Yes No

5. Complies with Established Contract Cost/ Price

Yes No

6. If Subrecipient had invoiced indirect costs, have they...

a) Had prior approval?

Yes No

b) An approved Cost Allocation Plan (CAP)? And, do the invoiced indirect costs follow the agreed CAP?

N/A	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/>	
N/A	

7. Costs Questioned:

Type	Value	Allowable Cost?	Comments
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	

8. Retainage \$

%

9. Cost approved

Approval	Signature	Date
Project Manager		

Appendix C

FTA Subrecipient Monitoring Quarterly Report Sample

FTA Subrecipient Monitoring Quarterly Report Sample

Date	_____	FY/QTR	_____
Contract Number	_____	Project Manager	_____
Project Title	_____	Division	_____
Subrecipient/ Agency	_____	Local Match	_____ %
Contract Value	_____	Payments to Date	_____

1. Scope of Project:
2. Current Quarter Accomplishments:
3. Findings or concerns that need to be addressed:
4. Corrective Actions Planned and Timing
5. OCTA Assistance Needed

6. Update on Milestone progress (complete for each activity line item)

Milestone	Original estimated completion date	Revised estimated completion date	Actual completion date
X			
XXX			
XXX			

5. For each revision to the milestone plan, please provide:

Milestone	Explanation: Why were scheduled milestones or completion dates not met? What problems were identified?	Response: How will problem be solved, and impact mitigated?	Expected Impact

6. Project cost variances

Note: different quantitative measures will be applicable for different projects. The below are provided as examples. The most relevant data should be requested from subrecipients

		Actual this quarter	Budget this quarter	Difference (budget-actual)	Actual to date	Planned budget to date	Difference (budget-actual)	Required to complete project	Remaining budget to complete project	Difference (budget-actual)
Progress measures	Hours Worked									
	Units Delivered									
	Sections completed									
Cost - line items (amend as relevant)	XXXX									
	XXX									
	XXX									

6b) Analysis of project cost variances: Any concerns the above analysis raises (i.e. greater cost incurred than activity achieved)

7. Please list all potential and executed change orders of amounts exceeding \$100,000, pending or settled during the last Quarter

Change order No.	Date issued	Date executed	Amount	Brief Description

8. Please list all claims settled during the last Quarter, and all outstanding claims that

- exceed \$100,000
- involve a controversial matter (irrespective of amount)
- involve a highly publicized matter (irrespective of amount)

Claim No.	Date issued	Date executed	Amount	Brief Description

9. Please list all real property acquisition actions during the quarter

10. Civil rights compliance issues identified or complaints raised (ADA, Title VI, DBE, EEO)

11 Please list any corrective actions outstanding during this reporting period and outline progress

Review Area	Deficiency	Corrective Action	Response Due date	Brief Description of progress (including completion date where relevant)

If the corrective actions have not been completed by the response due date:

11b) What are the reasons for the delay?
11c) OCTA response:

Appendix D

FTA Subrecipient Review Guide

FTA Subrecipient Review Guide

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Financial Management and Financial Capacity

All Subrecipients

If option is red & underlined, see finding and corrective action.

Document #1: Written financial policies and procedures			Finding & Corrective action	Comments
1. Does the subrecipient have financial policies and procedures?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>No written financial policies and procedures</i></p> <p>Subrecipient must document its financial functions in written policies and procedures.</p>	
a. If yes, do procedures address preparation of reports that compare actual expenses against budgets?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>No process / procedure for comparing actual expenses to budget</i></p> <p>Direct subrecipient to document variance analysis its financial functions in written policies and procedures</p>	

Document #2 #3 and #4: Audited financial statements for the past three years and comprehensive annual financial report (CAFR)			Finding & Corrective action	Comments
2. Does the subrecipient have audited financial statements for the past three years?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Annual audit not conducted</i></p> <p>Direct subrecipient to have annual audits conducted</p>	
3. Does the subrecipient have A-133 Single Audit Reports management letter comments for the past three years?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Single audit submissions deficient</i></p> <p>Direct subrecipient to submit single audits, management letter comments, and with a process to ensure that future submissions are</p>	

			completed	
4. Does the subrecipient have a Comprehensive Annual Financial Report (CAFR)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	CAFR not conducted Direct the subrecipient to develop a CAFR as a standard practice	
a. If yes to 2), 3) or 4) Were there any audit findings?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	N/A	
b. If yes to a) Did subrecipient submit a management letter to OCTA?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Subrecipient had audit findings but did not formally notify OCTA. Direct subrecipient to submit single audits, management letter comments, and with a process to ensure that future submissions are completed	

Document #5: OIG or GAO audit reports with findings relating to FTA			Finding & Corrective action	Comments
5. Does the subrecipient have OIG or GAO audit reports with findings relating to FTA?	<input type="checkbox"/> Yes	N/A	N/A	
a. If yes: Did subrecipient resolve/close the audit findings?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Unresolved OIG or GAO audit findings	
b. Does the GAO note any issues related to financial management or capacity?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Subrecipient must submit evidence of the resolution of all outstanding review deficiencies by the GAO, OIG and/or any other local or state audits.	

Document #6: Three to five year capital and operating financial plan			Finding & Corrective action	Comments
6. Does the subrecipient	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	No existing financial plan	

have a three to five year capital and operating financial plan?			Subrecipient must submit a multi-year financial plan	
a. If yes: Does the capital and operating financial plan project the required number of years?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Financial plan lacks required details</i>	
b. Does the plan show operating and capital revenues and expenses?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Subrecipient must submit a multi-year financial plan	

Document #7: Documentation of matching funds			Finding and Corrective Action	Comments
7. Does the subrecipient have a documentation of matching funds?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Ineligible local match</i> Subrecipient must provide documentation that the funds it uses for local match are eligible (including any volunteer or in-kind services) and establish procedures for drawdowns/invoicing to demonstrate appropriate use of FTA versus matching funds	
a. If yes: Are revenue sources stable and reliable enough to meet future operational and routine capital costs?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Match funding is not secure or in-kind contributions are insufficiently documented</i>	
b. If matched funding is through in-kind contributions: a) has the value been documented and supported, b) does the cost represent a cost that would otherwise be eligible under the program, and c) are the in-kind costs included in	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Subrecipient must provide documentation that the funds it uses for local match are eligible (including volunteer or in kind services) and establish procedures for drawdowns/invoicing to demonstrate appropriate	

the new project costs in the project budget?			use of FTA versus matching funds.	
--	--	--	-----------------------------------	--

If the subrecipient charges indirect costs:

Document #8: Cost allocation plan and cognizant agency correspondence/approval			Finding & Corrective Action	Comments
8. Does the subrecipient have a Cost allocation plan and cognizant agency correspondence/ approval?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Cost allocation plan deficiencies</i> Subrecipient must obtain cognizant agency* approval of the CAP and provide procedures for updating and submitting the plan annually	
a. If yes: Did subrecipient submit its CAP for approval to cognizant agency?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>CAP not approved or not up to date.</i> Subrecipient must obtain cognizant agency approval of the CAP and provide procedures for updating and submitting the plan annually	
b. Has subrecipient updated plan annually and retained it for audit and/or updated that plan if required?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

*The cognizant agency is that which provides the largest amount of federal funds to the subrecipient

Legal

All Subrecipients

If option is red & underlined, see finding and corrective action.

Document 1: Disclosure documentation			Finding and Corrective Action	Comments
1. Does the subrecipient have documentation that proper disclosures have been made and filed with the subrecipient on the OMB Standard Form LLL?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Lobbying disclosure issue</i> Subrecipient must submit documentation as required and develop and/or document the process to ensure timely reporting in the future	

Technical Capacity

All Subrecipients

If option is red & underlined, see finding and corrective action.

Document #1: Grant administration procedures, if written			Finding and Corrective action	Comments
1. Does the subrecipient have written grant administration procedures?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>No written grant administration policies and procedures</i></p> <p>Subrecipient must submit documented grant administration procedures</p>	

Document #2 and #3: Grant closeout schedule and list of subgrants with 95% expenditures complete			Finding and Corrective action	Comments
2. Does the subrecipient have a list of any subgrants with 95% expenditures complete?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Inactive grants/untimely closeouts tie to the lack of procedures as well</i>	
a. If Yes: Does the subrecipient have a large number of grants that should potentially be closed out? <ol style="list-style-type: none"> I. Are any grants 100% disbursed? II. Have any grants been obligated more than three years ago and have not had a disbursement in the past 12 months? 	<input checked="" type="checkbox"/> <u>Yes</u>	<input type="checkbox"/> No	Direct subrecipient to submit procedures for spending older funds first, tracking projects, identifying project balances, reprogramming the unused project funds to other projects, or closing out the projects.	
b. Does the subrecipient have a grant close out schedule that contains: <ol style="list-style-type: none"> I. Final Financial Report II. Final budget revision reflecting project cost by scope and activity III. Final narrative milestone/progress report including a discussion of each activity line item contained in the final 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

budget IV. A list of equipment purchased under the subgrant V. Request to deobligate any unexpended balance of Federal funds as applicable				
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Document #3: Force accounts plans/ justifications/ approvals (if force account work over \$100,000)			Finding and Corrective action	Comments
3. Does the subrecipient have force accounts plans/ justifications/ approvals?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Lacking force account plan/ required justification</i> Direct subrecipient to develop and submit a force account plan and justification as detailed in FTA Circular 5010.D for use of its own workforce on capital improvement projects and procedures for developing force account plans when required.	
a. If yes: Does the plan include a justification for using force account work including one of the four conditions: I. Cost savings II. Exclusive expertise III. Safety and efficiency of operations IV. Union agreement	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
b. If force account work is over \$10 Million, has FTA approval been given?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

Document #4: Quarterly reporting documents (MPR/FFR inputs)			Finding and Corrective action	Comments
4. Does the subrecipient have Quarterly reporting documents (MPR/FFR inputs)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Late or incomplete quarterly reporting documents</i> Subrecipient must submit delinquent reports for the most recent period and procedures for submitting reports with all required information	
a. If yes: Has the subrecipient missed any required quarterly reports?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		
b. Do the subrecipient's quarterly financial reports include: I. Cash on hand at the beginning of the period II. Cash receipts III. Cash disbursed	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

IV. OCTA share of expenditures			on time.	
V. Subrecipient share of expenditure				
VI. Unliquidated obligations				

If subrecipient is using contractors, transit management or service contractors

Document #5: Oversight procedures for contractors			Finding and Corrective action	Comments
5. Does the subrecipient have oversight procedures for contractors?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Inadequate oversight of third part contractor/lessees</i> Subrecipient must submit procedures and a staffing plan to monitor other entities with responsibility for meeting FTA requirements.	
a. If yes: Has subrecipient reviewed documentation to ensure that contractors meet all statutory and program requirements?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
b. Does subrecipient have a system/procedures/mechanism in place to monitor contractors? Note: Systems may include applications/requests for proposals, monthly quarterly or annual reports, meetings, site visits, and vehicle/facility inspections.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

Document 6 is applicable if the subrecipient is working on a capital project:

Document #6: Procedures for technical inspection/supervision of capital projects			Finding and Corrective action	Comments
6. Does the subrecipient have procedures for <u>technical inspection/ supervision</u> of the capital project?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>No procedures for technical inspection/supervision of work in progress</i> The subrecipient must submit project management procedures for existing or future projects to	
a. If yes: Do the procedures provide for continuous progress monitoring of the capital project?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
b. Do any of the subrecipient's monthly progress reports indicate unexplained capital	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

project delays?			<p>address deficiencies identified.</p> <p><i>Subrecipient oversight of capital project lacking</i></p> <p>The subrecipient must submit explanations for any capital project delays and submit project management procedures for existing or future projects to address deficiencies identified</p>	
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On site Visit Document Review

Document 1 and 2 are applicable if the subrecipient is working on a construction project:

Document #1 : Construction logs and diaries			Finding and Corrective action	Comments
1. Do the construction logs and/or diaries match against certified payrolls, and show compliance to David Bacon requirements	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<p><i>Subrecipient oversight of contractors lacking. Not complying with David Bacon Requirements.</i></p> <p>The subrecipient should immediately suspend any payment to contractors that are not in compliance and seek advice from OCTA/ FTA regarding further enforcement required.</p>	

Document #2: Davis Bacon Wage rate posters on site			Finding and Corrective action	Comments
2. Is the Davis Bacon wage rate poster in a prominent and	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Subrecipient oversight of</i>	

accessible place where it may be easily seen by employees?			<i>contractors lacking. Not complying with David Bacon Requirements.</i> The subrecipient should submit evidence that wage rate poster is displayed correctly.	
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Maintenance

All Subrecipients with FTA funded rolling stock or FTA funded facilities

If option is red & underlined, see finding and corrective action. Put N/A where not applicable

Document #1 and #2: Maintenance Plans			Finding and Corrective action	Comments
<ul style="list-style-type: none"> - Vehicles - Facilities and Equipment 				
1. Does the subrecipient have a vehicle maintenance plan (if applicable)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>No vehicle maintenance plan</i></p> <p>Direct subrecipient to submit a new or revised maintenance plan/program and evidence that it has been implemented.</p>	
2. Does the subrecipient have a Facilities and Equipment maintenance plan (if applicable)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Facility/equipment maintenance program lacking or inadequate</i></p> <p>Direct subrecipient to submit a new or revised maintenance plan/program and evidence that it has been implemented.</p>	
<p>a. If Yes to 1 or 2: Does the subrecipient's vehicle and facility/equipment maintenance plans include the following items:</p> <ul style="list-style-type: none"> I. Goals and objectives II. System of periodic inspections performed at certain defined intervals III. Vehicle specific preventive maintenance activities (updated with addition of new vehicles in the fleet) IV. Preventive 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Vehicle or facility/equipment maintenance plan lacking or inadequate</i></p> <p>Direct subrecipient to submit a new or revised maintenance plan/program and evidence that it has been implemented.</p>	

maintenance activities for facilities and equipment.				
--	--	--	--	--

Document #3: Manufacturer’s recommended preventive maintenance schedules for vehicles, equipment, and facilities			Finding and Corrective action	Comments
3. Does the subrecipient have manufacturer’s recommended preventive maintenance schedules for vehicles, equipment, and facilities?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Vehicle/facility/equipment maintenance program lacking or inadequate</i> Direct subrecipient to submit a new or revised maintenance plan/program and evidence that it has been implemented.	

Document #4 List of vehicles and equipment under warranty			Finding and Corrective action	Comments
4. Does the subrecipient have a list of vehicles and equipment under warranty	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Warranty claims not pursued effectively</i> Subrecipient must submit a written system for managing warranty claims with a plan for implementation.	
a. If yes: Does subrecipient have a system for identifying warranty claims, recording claims, and enforcing claims against manufacturers? Note: Review vehicle and equipment records and files for the program to assess how timely and aggressive the subrecipient has been in pursuing and collecting warranty claims.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

If the subrecipient has contractors undertaking maintenance activities

Document #5 Contractor oversight procedures	Finding and Corrective	Comments
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			action	
5. Does the subrecipient have contractor oversight procedures	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Inadequate oversight of contracted maintenance activities</i>	
a. If yes: Does subrecipient have procedures and/or a mechanism to monitor contractor's maintenance activities?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Subrecipient must submit a written maintenance plan and an amended agreement, contract, or lease incorporating the plan that includes maintenance standards compatible with FTA requirements and/or the performance measures for timely maintenance.	

On site Visit Document Review

Does the subrecipient have the following documents?			Finding and Corrective Action	Comments
1. PM inspection records: vehicles For review of vehicles, facilities, and equipment, preventative maintenance must be performed on time at least 80% of the time. Under 80% on time performance should lead to finding and corrective action.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Late vehicle preventive maintenance</i> Direct subrecipient to submit procedures for completing preventive maintenance on time. Subrecipient must submit a monthly report signed by the chief executive officer or other senior management designee on its preventive maintenance results until the data demonstrate it has conducted at least 80 percent of its preventive maintenance on time.	
2. PM inspection records: facilities/equipment For review of vehicles, facilities, and equipment, preventative maintenance must be performed on time at least 80% of the time.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Late facility/equipment maintenance</i> Subrecipient must submit procedures for completing preventive maintenance inspections on time. For the	

Under 80% on time performance should lead to finding and corrective action.			item examined, direct the subrecipient to submit a monthly report signed by the chief executive officer or other senior management designee on its preventive maintenance results until the data demonstrates it has conducted at least 80 percent of its preventive maintenance on time for three consecutive months.	
3. PM inspection records: ADA accessibility features	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Violation of procedures to ensure maintenance of accessible features</i> Subrecipient must submit an updated maintenance program for accessibility features.	
4. Procedure for warranty claims	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Warranty claims not pursued effectively</i> Subrecipient must submit a written system for managing warranty claims with a plan for implementation.	

Americans with Disabilities Act

All subrecipients that

- *Have FTA funded facilities, or*
- *Operate fixed route services, or*
- *Operate demand response*

Where document not applicable to service / facilities provided state N/A

If option in red & underlined, see finding and corrective action.

Document #1: Operating policies for service persons with disabilities			Finding and Corrective action	Comments
1. Does the subrecipient have operating policies for service persons with disabilities	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	ADA service provision deficiencies Subrecipient must document policies and procedures to include all required service provisions.	
a. If Yes: Do procedures address stop announcements for fixed route service at transfer points, major intersections, destination points, intervals along the route to orient passengers, and any stop upon request?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	ADA service provision deficiencies Direct subrecipient to document that policies have been revised and required service provisions have been implemented.	
b. Do the procedures address the means by which an individual with a visual impairment or other disability waiting at a stop can identify the route on which he or she wants to travel when more than one route serves a stop?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
c. Do the procedures address maintaining accessibility features in operative condition?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

d. Do the procedures address the conditions under which the entity must ask persons to move in order to allow the individual with a disability to occupy the seat or securement location?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
e. Do the procedures prohibit the subrecipient from setting weight or size limitations on wheelchairs it will transport that understate the weight capacity that the vehicle fleet can actually accommodate?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
f. Do the procedures require the subrecipient to permit a passenger who uses a lift or ramp to board or disembark from a vehicle at any designated stop, unless the lift or ramp cannot be deployed?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
g. Do the procedures prohibit the subrecipient from denying service to individuals using respirators, concentrators, or portable oxygen?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
h. Do the procedures require that adequate time be given for individuals with disabilities to board or disembark a vehicle?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

Document #2 ADA complementary paratransit eligibility application materials and eligibility & appeal decision letters			Finding and Corrective action	Comments
2. Does the subrecipient	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Improper ADA</i>	

have ADA complementary paratransit eligibility application materials and eligibility & appeal decision letters?			<i>complementary paratransit determination process</i> Subrecipient must submit procedures for its eligibility determinations and appeals process	
a. If Yes: Do eligibility application materials indicate that applications must be processed within 21 calendar days of submittal?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Improper ADA complementary paratransit determination process</i> Direct subrecipient to submit revised procedures for its eligibility determinations and/or appeals process to meet the regulatory requirements.	
b. Do eligibility application materials indicate that applicants will be given a written reason for the determination to deny the application?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
c. Do eligibility decisions letters provide information on the appeals process?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
d. Does the appeals process indicate that should the appeals process exceed 30 days, paratransit service must be provided from that time until a decision to deny the appeal is issued?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

Document #3 ADA Complementary paratransit service performance data			Finding and Corrective action	Comments
3. Does the subrecipient have data on the trip denial rate, on-time performance rate, number of missed trips, and number of excessively long trips for ADA complementary paratransit service for the current year?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Capacity Constraints</i> Subrecipient must review its capacity to meet the 100% next day availability requirement	
a. If Yes: Do the data	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<i>Pattern or practice issues</i>	

indicate a pattern or practice of trip denials, untimely pickups, missed trips, or excessively long trips?			Subrecipient must submit a plan to increase capacity or take measures to reduce demand.	
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Document #4 Operating policies regarding ADA paratransit trip reservations and scheduling			Finding and Corrective action	Comments
4. Does the subrecipient have operating policies regarding ADA paratransit trip reservations and scheduling (<i>can be combined with Document #1</i>)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>ADA service provision deficiencies</i> Subrecipient must document policies and procedures to include all required service provisions.	
a. If Yes: Are requests for reservations accepted during normal business hours on a “next day” basis?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>ADA service provision deficiencies</i> Subrecipient must submit documentation that it has taken immediate steps to change any operating policies that do not meet regulatory requirements.	
b. Does the subrecipient limit the number of reservations made during a phone call?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

Document #5 No-show/late cancellation policy			Finding and Corrective action	Comments
5. Does the subrecipient have a no-show/late cancellation policy	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>ADA service provision deficiencies</i> Subrecipient must document policies and procedures to include all required service provisions	
a. If Yes: Does the subrecipient suspend riders who do not demonstrate a true pattern or practice of no-shows?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<i>ADA service provision deficiencies</i> Subrecipient must revise its no-show policy to only suspend riders who demonstrate a true pattern or practice of no-shows.	
b. Does the subrecipient count no-shows not under the rider’s control?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		<i>ADA service provision deficiencies</i>

			Subrecipient must stop counting no-shows that are not under the rider's control.	
c. Does the subrecipient assess financial penalties for no-shows?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<i>ADA service provision deficiencies</i> Subrecipient must stop assessing financial penalties for no-shows.	
d. Does the subrecipient allow riders to contest no-shows or appeal suspensions?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>ADA service provision deficiencies</i> Subrecipient must allow riders to contest no-shows and appeal suspensions.	

Document #6 Complaint process			Finding and Corrective action	Comments
6. Does the subrecipient have a complaint process?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Insufficient ADA complaint process</i> Subrecipient must develop and implement process for reviewing and resolving complaints.	
a. If Yes: Is there an internal procedure for reviewing complaints?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Insufficient ADA complaint process</i> Subrecipient must implement a policy and procedure for reviewing and resolving complaints.	

Title VI

All subrecipients

Note: Some documents listed below apply only to areas with over 200,000 UZA. If this is not applicable state N/A

<i>If option is red & underlined, see finding and corrective action.</i> Document #1 Title VI complaint process and complaints			Finding and Corrective action	Comments
1. Does the subrecipient have a Title VI complaint process and complaints	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Title VI notification deficiencies</i></p> <p>Subrecipient must publish in its Title VI notice a description of procedures that members of the public shall follow in order to file a Title VI complaint against the subrecipient.</p>	

If a facility has been sited after October 1st 2012

Document #2 Equity analysis for facility siting			Finding and Corrective action	Comments
2. Does the subrecipient have an Equity analysis for facility siting	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Failure to comply with Title VI determination of site or location of facilities requirements</i></p>	
a. If Yes: Did the subrecipient complete an equity analysis during the planning stages of a project that established a new site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p>For facilities still in the process of siting, direct the subrecipient to meet Title VI requirements before proceeding to making a siting decision. Subrecipient must provide a plan for conducting equity analysis for facility siting for future projects.</p>	

Document #3 Documentation of LEP Analysis/Implementation Plan/Language Assistance Plan			Finding and Corrective action	Comments
3. Does the subrecipient have documentation of LEP Analysis/ Implementation Plan/ Language Assistance Plan	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Lacking a language assistance plan</i></p> <p>Direct the subrecipient to submit a language assistance plan with a completed four factor analysis, along with a list of language assistance it has provided or intends to provide, based on the analysis and a timeline for providing this assistance.</p>	
a. If Yes: Does the subrecipient’s LEP plan include the areas of the four factor analysis below				
I. the number and proportion of LEP persons served or encountered in the eligible service population	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
II. the frequency with which LEP individuals come into contact with the program	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
III. the nature and importance to people’s lives of the program, activity, or service provided	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
IV. the resources available to the recipient for LEP outreach and the associated costs	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
b. Does the subrecipient’s LEP plan include:				
I. Identification of LEP individuals who need language assistance	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
II. Develop language assistance measures	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
III. Detail how to provide notice to LEP persons	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
IV. Address procedures for monitoring implementation and updating the plan	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

Documents 4-7 are applicable for Subrecipients with over 200,000 UZA:

Document #4 Demographic data/analyses (over 200,000 UZA)	Finding and Corrective action	Comments

4. Does the subrecipient have demographic data/analyses	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Demographic data lacking</i>	
a. If Yes: Does the subrecipient's Title VI plan include demographic maps and overlays, results of customer surveys, or information on procedures to collect and analyze demographic data?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	Direct the subrecipient to submit documentation of updated maps and overlays, the results of customer surveys, or additional information in accordance with the applicable requirements of circular FTA C4702.1B.	

Document #5 and #6 Service Standards and Documentation of service monitoring to identify disparities (over 200,000 UZA)			Finding and Corrective action	Comments
5. Does the subrecipient have service standards/policies	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>No procedures for monitoring level or quality of service</i> Direct the subrecipient to submit the results of an updated monitoring program, consistent with the procedures in FTA C 4702.1B.	
6. Does the subrecipient have documentation of service monitoring to identify disparities	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
a. If Yes to either 5 or 6: Does the subrecipient's monitor the service it provides to identify any disparities in the level and quality of service provided to different demographic groups?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

Document #7: Documentation of equity analysis for fare or service changes (over 200,000 UZA)			Finding and Corrective action	Comments
7. Does the subrecipient have Documentation of equity analysis for fare or service changes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Impact of fare and/or service changes not adequately documented</i> Direct the subrecipient to submit to procedures for major service change policy,	
a. If Yes: Has the subrecipient completed an equity analysis for recent fare or service	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

changes?			disparate impact policy, or disproportionate burden policy, and/or procedures to implement these policies.	
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Procurement

All Subrecipients

If option is red & underlined, see finding and corrective action.

Document #1: Written procurement policies and procedures			Finding and Corrective action	Comments
1. Does the subrecipient have written procurement policies and procedures	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Procurement policies and procedures not evident</i></p> <p>Subrecipient must develop procurement procedures that address the requirements listed in 4220.1F</p>	
If Yes: do the procedures include the following?				
<p><i>Corrective Action for any deficiency:</i> Direct subrecipient to submit updated procedures with the required information</p>				
<p>a. Written protest procedures</p> <p>The subrecipient has written protest procedures to handle and resolve disputes relating to their procurements. These procedures require the following:</p> <ul style="list-style-type: none"> In all instances involving FTA funds the subrecipient must disclose information regarding the protest to OCTA, and keep OCTA informed about the status of the protest, All protest decisions must be in writing, and A protester must exhaust all administrative remedies with the subrecipient before pursuing a protest with FTA. 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
<p>b. Standards of conduct</p> <p>The subrecipient has a written code of standards of conduct which provides that no employee, officer, agent, immediate family member, or Board member of the subrecipient shall participate in the selection, award, or administration of a contract supported by FTA funds if a conflict of interest, real or apparent, would be involved. The subrecipient defines such a conflict to be when any of the following has a financial or other interest in the firm selected for award:</p> <ul style="list-style-type: none"> The employee, officer, agent, or Board member, Any member of his/her immediate family, His or her partner, or An organization that employs, or is about to employ, any of the above. 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

<p>The subrecipients code of conduct also provides that its officers, employees, agents, or Board members will neither solicit nor accept gifts, gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to subagreements and contains penalties, sanctions, or other disciplinary action for violation of such standards by the subrecipient's officers, employees, or agents, or by contractors or their agents.</p>			
<p>c. Requirements for full and open competition All procurement transactions will be conducted in a manner providing full and open competition.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
<p>d. Requirements for responsibility determination Make awards only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration shall be given to contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. Undertake a System for Award Management check (www.SAM.gov)</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
<p>e. Requirements for maintaining a written record of the procurement history At a minimum, these records shall include:</p> <ul style="list-style-type: none"> • The rationale for the method of procurement, • Selection of contract type • Reasons for contractor selection or rejection, and <p>The basis for the contract price.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
<p>f. Coverage of Time and Materials type contracts Requirement that “Time and Materials Type Contracts” may only be used:</p> <ul style="list-style-type: none"> • After a determination that no other type of contract is suitable, and • If the contract specifies a ceiling price that the contractor shall not exceed except at its own risk. 	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
<p>g. Contract term limitation for rolling stock Contract term limitation for rolling stock and replacement parts shall not exceed the recipient’s needs for rolling stock and replacement parts within five (5) years inclusive of options without prior written FTA approval when FTA funds are involved. For all other types of contracts, the contract file contains evidence that the contract term is based upon sound business judgment.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
<p>h. Requirements for A&E procurements The Brooks Act procedures apply and may only be used when procuring A&E services:</p> <ul style="list-style-type: none"> • Evaluate qualifications excluding price as a factor, • Negotiate only with the most qualified offeror, and • Failing agreement on price, negotiate with the next most qualified offeror until agreement is reached on a price 	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	

that is determined to be fair and reasonable.			
i. Requirements for micro purchases (\$3,000 or less) <ul style="list-style-type: none"> • Competition not required • Must document determination that price is fair and reasonable and how the determination was derived • Prohibit splitting of procurements to avoid competition, and • When competition is not obtained, require equitable distribution among qualified suppliers 	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
j. Requirements for small purchases (for FTA funded purchases the threshold may range from \$3,000 to \$100,000) : <ul style="list-style-type: none"> • Must obtain price or rate quotations from an adequate number of qualified sources, and • Document file that price is fair and reasonable. 	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
k. Requirements for Sealed Bids (IFB) <ul style="list-style-type: none"> • Defines conditions for sealed bids • Requires public advertising • Must allow sufficient time to prepare bids prior to bid opening • Award must be made to the lowest responsive and responsible bidder, and • Must document sound business reason if any or all bids are rejected. 	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
l. Requirements for request for proposals <ul style="list-style-type: none"> • Requests for proposals will be publicized. All evaluation factors will be identified along with their relative importance; • Proposals will be solicited from an adequate number of qualified sources; • Subrecipients will have a method in place for conducting technical evaluations of the proposals received and for selecting awardees; • Awards will be made to the responsible firm whose proposal is most advantageous to the subrecipient's program with price and other factors considered; and <p>In determining which proposal is most advantageous, subrecipients may award (if consistent with State law) to the proposer whose proposals offer the greatest business value to the Agency based upon an analysis of a tradeoff of qualitative technical factors and price/cost to derive which proposal represents the "best value" to the Procuring Agency as defined in 4220.1F, I, 5. b., Definitions. If the subrecipient elects to use the best value selection method as the basis for award, however, the solicitation must contain language that establishes that an award will be made on a "best value" basis.</p>	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	
m. Requirements for sole source procurements	<input type="checkbox"/> Yes	<input type="checkbox"/> <u>No</u>	

<ul style="list-style-type: none"> • Infeasible to use small purchase, sealed bid, or competitive procedures, and <ul style="list-style-type: none"> (a) Item is available only from one source, (b) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation, (c) FTA authorizes noncompetitive negotiations, (d) After solicitation of a number of sources, competition is determined inadequate, or Cost and profit analysis are required. 			
<p>n. Prohibition on geographic preference</p> <p>Except when procuring A&E services, prohibits the use of statutorily or administratively imposed in-State or local geographical preferences in the evaluation of bids or proposals unless Federal statutes expressly mandate or encourage geographic preference.</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>o. Requirements for using brand name or equal specifications</p> <ul style="list-style-type: none"> • Only when an adequate specification cannot be provided without performing an inspection and analysis in time for the acquisition under consideration, and • Minimum needs are carefully identified and those salient physical and functional characteristics of the brand name product are clearly set forth in the solicitation. 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>p. Requirements for the use of options</p> <ul style="list-style-type: none"> • Option quantities must be evaluated to determine contract award, and • When exercising options, ensure it is in accordance with the contract and that the price is better than prices available in the market or is more advantageous at the time the option is exercised. 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>q. Requirements for Independent Cost Estimates</p> <p>Must make independent cost or price estimates before receiving bids or proposals.</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>r. Requirements for Cost and Price Analysis</p> <p>Must perform cost and profit analysis when adequate price competition is lacking</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>s. Coverage of the use of progress payments</p> <p>Progress payments may only be made on the basis of costs incurred (or, in the case of construction contracts only, on the basis of percent of completion) and the subrecipient must obtain adequate security for which progress payments are made. Adequate security may include taking title, letters of credit or equivalent means to protect the subrecipients interest.</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

Document #2: Contract Administration System Procedures			Finding and Corrective action	Comments
2. Does the subrecipient have Contract Administration System Procedures	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>No contract administration system</i> Subrecipient must develop procedures for ensuring contractors perform according to the terms and conditions of their contracts	
a. If Yes: Do the procedures provide guidance for ensuring that third party contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Contract administration system lacking</i> Direct subrecipient to submit procedures for administering contracts.	

Document 3 applies if Subrecipient uses a prequalification system:

Document #3 List of prequalification criteria (if applicable)			Finding and Corrective action	Comments
3. Does the subrecipient have a list of prequalification criteria (if applicable)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>No adequate prequalification criteria</i> Subrecipient must develop prequalification procedures that address the requirements listed in 4220.1F	
a. If Yes: Do the prequalification criteria:			<i>No adequate prequalification criteria</i> Direct subrecipient to submit revised procedures to administer the prequalification system.	
I. Ensure the list of prequalified firms is kept up to date?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
II. Allow bidders to qualify during the solicitation period?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
III. Allow for full and open competition among prequalified	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

firms?				
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Document 4 applies to all Subrecipients:

Document #4 List of FTA funded capital and operating procurements over the last 2 years or since the last review (whichever is most recent)				Comments
4. Has the Subrecipient provided a List of FTA funded capital and operating procurements over the last 2 years or since the last review (whichever is most recent)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	Note: this list is used to develop a sample of procurement files for review at the site visit.	

On site Visit Procurement File Review

Procurement files for FTA funded capital and operating procurements will be reviewed on site using the Procurement File Checklist. This checklist provides guidance on the requirements and applicability. It is provided separately for ease of use on site in Appendix I. One checklist should be filled in for each procurement file reviewed. The findings from these reviews can be summarized in the below table:

<p>a. Did the procurement files reviewed contain the following documentation:</p> <p><i>Corrective Action:</i> Direct subrecipient to revise procedures to address missing procurement documentation and evidence that documentation has been properly completed in future procurements.</p>			
Number of files reviewed:			Comments
a. Selection Procedures	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
b. Independent Cost Estimate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
c. Cost/Price Analysis	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
d. Responsibility Determination	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
e. Justification for Noncompetitive Awards	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
f. No excessive bonding requirements	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
g. No exclusionary specifications	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	

h. No geographic preferences	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
i. Evaluation of Options	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
j. Exercise of Options	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
k. Lobbying Certifications Signed by Contractors	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
l. Buy America Provisions in Solicitation or Contract	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
m. Time and Materials Type Contract	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
n. Qualifications Based Procurement Requirements	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
o. Liquidated Damages Clause	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
p. Change Order Documentation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	
q. Contract Clauses	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	

On Site Review - Buy America Compliance

Buy America relates to all procurements of steel, iron, and manufactured products, except for products with a waiver or purchases under the simplified acquisition threshold (currently \$100,000)

Document #5 Pre and Post Delivery certifications				Comments
5. Does review of the construction area and pre/ post-delivery certifications show compliance with Buy America Requirements?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Lack of signed Buy America certifications from vendors</i></p> <p>The subrecipient must provide information documenting that the procurement complies with Buy America provisions</p>	

Disadvantaged Business Enterprise

All subrecipients with over \$250K in FTA contracting opportunities (not including revenue vehicles)

If option is red & underlined, see finding and corrective action.

Document #1: DBE Program Submitted and Approved by OCTA			Finding and Corrective action	Comments
1. Does the subrecipient have a DBE Program Submitted and Approved by OCTA	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>No submitted and approved DBE program</i> Subrecipient must develop a DBE program that meets the FTA requirements	
a. Does the program reflect the current organizational structure of the agency?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>The program does not reflect the current organizational structure.</i> Direct subrecipient to submit a revised DBE program that reflects the current organizational structure.	

Document #2: Goal methodology and current goal (if applicable)			Finding and Corrective action	Comments
2. Does the subrecipient have a goal methodology and current goal	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>DBE goal submission not complete</i> Subrecipient must prepare a DBE goal methodology and establish current DBE goals	

Document #3: DBELO job description and organizational chart showing relationship of DBELO			Finding and Corrective action	Comments
3. Does the subrecipient have a DBELO job description and organizational chart showing relationship of DBELO	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Inadequate designation of DBE Officer</i> Subrecipient must designate a DBELO and ensure DBELO has direct access to the chief executive for DBE	

			related matters	
a. Does the DBELO have direct and independent access to the CEO?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Inadequate designation of DBE Officer</i>	
b. Does the DBELO's position present a conflict of interest?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Direct subrecipient to change the DBELO designation as needed.	

Document #4: DBE Uniform Reports submitted to OCTA			Finding and Corrective action	Comments
4. Does the subrecipient have a DBE Uniform report submitted to OCTA	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>DBE uniform reports not submitted</i> Subrecipient must complete all delinquent uniform reports and develop procedures to ensure reports are submitted on time	
a. Do the reports include all applicable FTA funded contracting activity?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>DBE uniform reports lacking information</i> Direct subrecipient to revise	
b. Can the subrecipient demonstrate how these reports are reconciled to procurement records?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	DBE uniform reports as needed to include the required information.	

Document 5 is only applicable if the subrecipient has not met DBE program goals

Document #5: DBE goal shortfall analysis (if applicable)			Finding and Corrective action	Comments
5. Does the subrecipient have a DBE goal shortfall analysis	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>DBE goal achievement analysis not completed or submitted</i> Subrecipient must develop the required shortfall analysis and corrective action plan	
a. Does the analysis include the reason DBE goals were not attained?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>DBE goal achievement analysis lacking</i> Direct subrecipient to revise	
b. Does the analysis include corrective actions to	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	the shortfall analysis to include the required	

increase DBE participation?			information.	
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Document #6: Good faith effort documentation			Finding and Corrective action	Comments
6. Does the subrecipient have good faith effort documentation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Inadequate implementation of DBE contract compliance</i> Subrecipient must develop procedure for including good faith effort documentation in all procurement actions	

Document #7: Compliance monitoring reports			Finding and Corrective action	Comments
7. Does the subrecipient have compliance monitoring reports	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Subrecipient does not monitor DBE compliance</i> Subrecipient must develop procedures for conducting and documenting DBE compliance	

Satisfactory Continuing Control

All subrecipients – different documentation is required for the different types of project that FTA funds (property, equipment, rolling stock). Where not applicable state N/A

If option in red & underlined, see finding and corrective action.

Document #1: Procedures for maintaining control of FTA funded property, equipment, and rolling stock (if applicable)			Finding and Corrective action	Comments
1. Does the subrecipient have procedures for maintaining control of FTA funded property, equipment, and rolling stock	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Inadequate property control system</i> Subrecipient must develop procedures for maintaining control of FTA funded property, equipment, and rolling stock	
a. If Yes: Do they contain disposition procedures	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Inadequate property control system</i>	
b. Do they contain procedures for applying insurance proceeds	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	Direct subrecipient to submit updated procedures with the required information.	

Document #2: Property records of federally funded equipment and rolling stock (if applicable)			Finding and Corrective action	Comments
2. Does the subrecipient have property records of federally funded equipment and rolling stock (if applicable)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Inadequate equipment records</i> Subrecipient must prepare a record of all FTA funded equipment and rolling stock	
a. If Yes: Do they contain			<i>Inadequate equipment records</i> Direct subrecipient to submit updated records with the required information.	
I. Description	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
II. ID Number	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
III. Acquisition Date	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
IV. Total Acquisition Cost	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
V. Federal Percentage	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
VI. Grant Number	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

VII.	Location	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
VIII.	Use and Condition	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
IX.	Disposition Action	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
X.	Vested Title	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
XI.	Useful Life	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

Document #3: Listing of real property, equipment, and vehicles removed from transit service (if applicable)			Finding and Corrective action	Comments	
3.	Does the subrecipient have a listing of real property, equipment, and vehicles removed from transit service	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Inadequate equipment records</i> Subrecipient must prepare a record of all FTA funded equipment and rolling stock removed from service	
a.	If Yes: Did the subrecipient notify OCTA when property was removed from the service originally intended?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>OCTA not informed and concurrence not received</i> Direct subrecipient to inform OCTA of real property that has been removed from service without OCTA approval and to submit procedures for notifying OCTA when FTA funded real property has been removed from service.	
b.	Was OCTA concurrence of disposition method received prior to disposing of property?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
c.	Was OCTA reimbursed for its share of disposition proceeds (if applicable)? (see The Common Rule (49 CFR Part 18), Master Agreement, and FTA Circular 5010.1D for detail)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>OCTA not reimbursed</i> Direct the subrecipient to submit to procedures for obtaining OCTA approval for the method of disposition of FTA funded real property.	

Document #4: Evidence of most recent inventory reconciliation (if applicable)			Finding and Corrective action	Comments	
4.	Does the Subrecipient have evidence of most recent inventory reconciliation	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>No evidence of physical inventory</i> Subrecipient must complete and document a formal	

			inventory of all equipment, parts, and rolling stock	
a. If Yes: Was the most recent inventory conducted within the previous two years?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Physical inventory not maintained</i> Direct the subrecipient to submit evidence that it has conducted a physical inventory and that the inventory results have been reconciled to equipment records and procedures for conducting a biennial physical inventory.	
b. Were the equipment records updated after the inventory was completed?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

Document #5: Excess real property inventory/ utilization plan (if applicable)			Finding and Corrective action	Comments
5. Does the subrecipient have an excess real property inventory/ utilization plan	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Lacking excess real property utilization inventory/plan out of date</i> Subrecipient must develop a written plan for disposing of excess real property.	
a. If Yes: Does the plan identify and explain the reason for the excess property?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Excess real property not sufficient</i> Direct the subrecipient to submit a written excess real property utilization plan or update the existing plan.	
b. Does the plan identify the current use of the property and anticipated or proposed disposition action?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

Document #6: Bus Fleet Contingency Plan (if applicable)			Finding and Corrective action	Comments
6. Does the subrecipient have a Bus Fleet Contingency Plan (if applicable)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Lacking contingency plan</i> Subrecipient must develop a contingency plan which includes all assets currently in the contingency fleet	
a. If Yes: Are buses in the contingency fleet properly stored,	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Contingency fleet plan insufficient</i>	

maintained, and identified in the contingency plan?			Direct the subrecipient to submit a plan for its contingency fleet.	
b. Does the plan identify the contingency vehicles, storage location(s) and maintenance activities?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

Document #7: Documentation of peak vehicle requirements for fixed route service (if applicable)			Finding and Corrective action	Comments
7. Does the subrecipient have documentation of peak vehicle requirements for fixed route service (if applicable)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Bus spare ratio</i> Subrecipient must develop data on current fleet size and number of vehicles required for peak service	
a. If Yes: Does the calculation include the total number of revenue vehicles?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<i>Bus spare ratio</i> Direct the subrecipient to submit a plan for reducing the spare ratio.	
b. Does the plan identify the number of vehicles needed for peak service?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
c. Does the spare ratio seem reasonable given the total number of vehicles?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

Planning/Program of Projects

All subrecipients

If option in red & underlined, see finding and corrective action

Document #1: Evidence of Participation in Coordinated Planning Process (5310)			Finding and Corrective action	Comments
1. Does the subrecipient have evidence of Participation in Coordinated Planning Process (5310)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>5310 coordinated transportation plan participation lacking</i></p> <p>Subrecipient must provide evidence of participation in the coordinated planning process.</p>	

Document #2: MPO’s public participation plan procedures (if applicable)			Finding and Corrective action	Comments
2. Does the subrecipient have MPO’s public participation plan procedures (if applicable)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Elements missing in POP public participation procedures</i></p> <p>Subrecipient must provide public participation procedures from the MPO which state that the MPO’s public participation process is used to satisfy the subrecipient’s and/or OCTA’s public participation process for the POP.</p>	
a. If Yes: Does the MPO’s public participation plan state that the MPO’s public participation process is used to satisfy the subrecipient’s and/or OCTA’s public participation process for the POP?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Elements missing in POP public participation procedures</i></p> <p>Direct the subrecipient to work with the MPO and OCTA to include the required language.</p>	

Document #3: Public notice of the POP	Finding and Corrective	Comments
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			action	
3. Does the subrecipient have a Public notice of the POP	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	POP public notice deficiencies Subrecipient must provide evidence that the POP was publicized by either the subrecipient, OCTA or the MPO	
If subrecipient is relying on the MPO's public participation plan:			POP public notice deficiencies	
a. Does the MPO's public notice of the TIP have an explicit statement that public notice of public involvement activities and time established for public review and comments on the TIP will satisfy the POP requirements?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	Direct the subrecipient to work with the MPO and OCTA to include the required language.	
If subrecipient is responsible for publishing the POP:			POP public notice deficiencies	
a. Was the public notice of the POP published in an appropriate local publication?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	Direct the subrecipient to ensure that a public notice of the POP is generated that meets the FTA requirements	
b. Does the public notice provide sufficient detail?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
c. Does the public notice offer an opportunity for a public hearing?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
d. Has the subrecipient communicated to significant populations of non-English speaking individuals (if applicable?)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
e. Does the public notice contain a statement that the proposed program will be the final program unless amended and a final notice is not published?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

Public Comment

All subrecipients operating fixed route service

If option is red & underlined, see finding and corrective action

Document #1: Description of procedures for public comment on fare increases and major service reductions			Finding and Corrective action	Comments
1. Does the subrecipient have a description of procedures for public comment on fare increases and major service reductions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Deficiencies in public comment process as defined</i></p> <p>Subrecipient must submit a written policy for soliciting and considering public comments prior to a fare increase or major service reduction that addresses fare increases, defines a major service reduction, describes how public comment will be solicited, and specifies how comments will be considered.</p>	

Document #2: Documentation from fare increases and major service reductions implemented since last review			Finding and Corrective action	Comments
2. Does the subrecipient have documentation from fare increases and major service reductions implemented since last review	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Public comments not considered accurately</i></p> <p>Subrecipient must submit amended procedures that incorporate consideration and documentation of public comment.</p>	

Half Fare

All subrecipients operating fixed route service

If option is red & underlined, see finding and corrective action

Document #1: Fare structure description			Finding and Corrective action	Comments
1. Does the subrecipient have a fare structure description that shows half fare	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Fares more than one half of fixed route fares</i></p> <p>Subrecipient must provide a plan and schedule for correcting its half fare program.</p>	

Document #2: Half fare program description			Finding and Corrective action	Comments
2. Does the subrecipient have a half fare program description?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Half fares not extended to all required services</i></p> <p>Subrecipient must provide a plan and schedule for correcting its half fare program.</p>	

Document #3: Half fare public information			Finding and Corrective action	Comments
3. Does the subrecipient have evidence of public information regarding half fares	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Half fare program/procedures deficient</i></p> <p>Subrecipient must submit information on its half fare program that will be disseminated/available to the public.</p>	

Document #4: Half fare ID application			Finding and Corrective action	Comments

<p>4. Does the subrecipient have information regarding required ID, including</p> <ul style="list-style-type: none"> - Any need for a special identification card (if required) - That Medicare card is accepted as proof of eligibility 	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<p><i>Half fare procedures deficient</i></p> <p>Subrecipient must submit a plan for making passengers aware of any need for a special identification card and enabling identification cards to be easily obtained. The subrecipient also must submit documentation that it accepts a Medicare card as proof of eligibility for the half fare program if it does not already accept it.</p>	
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Charter Bus

All subrecipients operating Charter Services

If option is red & underlined, see finding and corrective action

Document #1: Quarterly reports to OCTA or FTA		Finding and Corrective action	Comments
1. Does the subrecipient have the Quarterly reports submitted? Note: If the subrecipient is also a direct recipient, these should be submitted to FTA. Otherwise these should be submitted to OCTA	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <u>No</u>	<i>Charter Reporting Issues</i> Subrecipient must submit delinquent reports and develop a procedure for ensuring reports are submitted on time	
a. If Yes: Do the reports indicate the subrecipient is operating charter service in violation of one or more allowed charter exceptions? (see below table)	<input checked="" type="checkbox"/> <u>Yes</u> <input type="checkbox"/> No	<i>Charter service is violating FTA regulation</i> Direct subrecipient to stop providing the unallowable charter service immediately.	

Charter Service Exceptions

Exception	Notification to Registered Charter Providers	Trip Record Keeping	Quarterly Reporting	Other Requirements
1. Government Officials	No	Yes	Yes	None
2. Qualified Human Service Organization (QHSO)	No	Yes	Yes	Evidence that QHSO receives funding, directly or indirectly, from the programs listed in Appendix A of the charter regulation or was registered at least 60 days before the date of the first request
3. Leasing of Equipment and Driver	No	Yes	Yes	Evidence that registered charter provider has exhausted all of the available vehicles of all registered charter providers in the grantee's geographic service area
4. No Response by Registered Charter Provider	Yes	Yes	Yes	None
5. Agreement with All Charter Providers	No	No	No	Properly executed agreements with all registered charter providers in grantee's geographic service area
6. Petition to the Administrator	Yes	No	No	Grantee must demonstrate how it contacted registered charter providers and how the grantee will use the registered charter providers in providing service to the event. Grantee must also certify that it has exhausted available registered charter providers' vehicles in the area.

School Bus

All subrecipients operating School Bus services

If option is red & underlined, see finding and corrective action

Document #1: Bus schedules showing tripper routes as part of regularly scheduled routes			Finding and Corrective action	Comments
1. Does the subrecipient have Bus schedules showing tripper routes as part of regularly scheduled routes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	No finding	
a. If Yes: Does the service meet the criteria for being open to all riders, not serving only schools, and promoted to the general public?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>School Bus violating FTA regulation</i></p> <p>Direct subrecipient to cease operating unallowable service immediately.</p>	

Drug-Free Workplace/Drug and Alcohol Program

All FTA subrecipients with safety sensitive employees

If option is red & underlined, see finding and corrective action

Document #1: Drug-free workplace policy			Finding & Corrective action	Comments
1. Does the subrecipient have a Drug-free workplace policy	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>No written DFWA policy</i></p> <p>Subrecipient must submit a written policy that includes all required elements along with documentation that the amended policy has been distributed to all grant-related employees.</p>	
If yes: Does the subrecipient's drug free workplace policy that states the following elements:			<p><i>DFWA policy does not include all the required elements</i></p> <p>Subrecipient must submit a written policy that includes all required elements along with documentation that the amended policy has been distributed to all grant-related employees.</p>	
a. The workplace is drug-free	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
b. The unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the workplace is strictly prohibited	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
c. Employees must abide by the terms of the policy statement as a condition of employment	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		
d. if convicted of a drug statute violation that occurred in the workplace, employees are to report it to the employer in writing no later than five calendar days after such a conviction	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>		

Document #2: Drug and alcohol testing policy	Finding & Corrective action	Comments

2. Does the subrecipient have a drug and alcohol testing policy	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<p><i>Drug and alcohol policy lacking required elements</i></p> <p>Subrecipient must submit an amended policy that has been adopted by the governing board or other “final authority,” and re-communicated to all affected employees.</p>	
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a. Does subrecipient’s drug and alcohol testing policy include the following elements:			
<i>Corrective Action:</i> Subrecipient must submit an amended policy that has been adopted by the governing board or other “final authority,” and re-communicated to all affected employees.			Comments
I. Proof of policy adoption by the appropriate governing body or other “final authority” with effective date indicated	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
II. Identity of the person, office, or position designated by the employer to answer questions about the anti-drug and alcohol misuse program	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
III. Categories of employees who are subject to testing	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
IV. Prohibited behavior, including when the regulations prohibit the use of alcohol and drugs	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
V. Testing circumstances for drugs and alcohol (i.e., pre-employment, random, post-accident, reasonable suspicion, return-to-duty (only for employers with a second-chance policy), and follow-up testing (only for employers with a second-chance policy))	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
VI. Drug and alcohol testing procedures consistent with 49 CFR Part 40, as amended	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
VII. Requirement that covered employees submit to drug and alcohol testing administered in accordance with FTA regulations	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
VIII. Check all (a) through (l) that are included Description of the behavior and circumstances that	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

<p>constitute a refusal to take a drug and/or alcohol test and a statement that a refusal constitutes a verified positive test result. The following describes refusals under the DOT program:</p> <p>(a) Fail to appear for any test (except a pre-employment test) within a reasonable time, as determined by the employer after being directed to do so by the employer</p> <p>(b) Fail to remain at the testing site until the testing process is complete (an employee who leaves the testing site before the testing process commences for a pre-employment test is not deemed to have refused to test)</p> <p>(c) Fail to provide a urine specimen for any drug test or an adequate amount of saliva or breath for any alcohol test required by this part or DOT agency regulations</p> <p>(d) Fail to provide a sufficient amount of urine or breath specimen when directed, and it has been determined, through a required medical evaluation, that there was no adequate medical explanation for the failure</p> <p>(e) Fail or decline to take an additional drug test the employer or collector has directed to be taken</p> <p>(f) Fail to undergo a medical examination or evaluation, as directed by the MRO or employer as part of the drug test verification process, or employer as part of the insufficient breath procedures. In the case of a pre-employment drug test, the employee is deemed to have refused to test on this basis only if the pre-employment test is conducted following a contingent offer of employment. If there was no contingent offer of employment, the MRO will cancel the test.</p> <p>(g) Fail to sign the certification at Step 2 of the alcohol testing form</p> <p>(h) Fail to cooperate with any part of the testing process (e.g., refuse to empty pockets when directed by the collector, behave in a confrontational way that disrupts the collection process, fail to wash hands after being directed to do so by the collector)</p> <p>(i) In the case of a directly observed or monitored collection in a drug test, fail to permit the observation or monitoring of</p>			
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<p>the provision of a specimen</p> <p>(j) For an observed collection, fail to follow the observer’s instructions to raise clothing above the waist, lower clothing and underpants, and to turn around to permit the observer to determine if there is any type of prosthetic or other device that could be used to interfere with the collection process</p> <p>(k) Possess or wear a prosthetic or other device that could be used to interfere with the collection process</p> <p>(l) Admit to the collector or MRO that the specimen was adulterated or substituted</p> <p>Instead of listing all the refusals, the policy may state that refusals to test are listed in 49 CFR Part 40, as amended, or 49 CFR 40.191, as amended, for drug tests and 49 CFR 40.261, as amended, for breath tests. The policy should then state that a copy of 49 CFR Part 40 is available upon request. However, if the policy lists any refusals to test, the policy must list all of them.</p>			
<p>IX. Description of the consequences for a covered employee who has a verified positive drug test result or a confirmed alcohol test with an alcohol concentration of 0.04 or greater. If the system has a second chance policy, a description of the evaluation and treatment processes must be included.</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>X. Description of the consequences for covered employees found to have an alcohol concentration of 0.02 or greater but less than 0.04</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	
<p>XI. Employer’s policy toward retesting of negative dilute urine collections as required by 49 CFR 40.197 that states that if the MRO informs the agency that a negative drug test was dilute, the agency may, but is not required to, direct the employee to take another test immediately. All employees must be treated the same for this purpose. For example, the subrecipient must not retest some employees and not others. The subrecipient may retest for some types of tests (e.g., pre-employment tests) and not others. The policy should state whether or not immediate retesting for negative dilutes is required and, if required, that the second test will be the test</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	

of record.			
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Document #3: Post-accident decision form, if used			Finding and Corrective action	Comments
3. Does the subrecipient have a Post-accident decision form?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<p><i>Improper post-accident determination</i></p> <p>Subrecipient must submit a process for making proper post-accident determinations, including procedures to document the decision-making process when appropriate.</p>	

Document #4 and #5: List of supervisors and other officials responsible for making reasonable suspicion testing decisions and training records			Finding and Corrective action	Comments
4. Does the subrecipient have a list of supervisors and other officials responsible for making reasonable suspicion testing decisions?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<p><i>Reasonable suspicion training not provided/insufficient</i></p> <p>Subrecipient must submit documentation that all</p>	
5. Does the subrecipient have training records of supervisors and other officials responsible for making reasonable suspicion testing decisions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<p>supervisors and other officials who make reasonable suspicion determinations have received the required training and procedures for ensuring training is provided before individuals are allowed to make reasonable suspicion testing decisions.</p>	

Document #6: Form requesting drug and alcohol testing history of applicants	Finding and Corrective action	Comments

6. Does the subrecipient have a form requesting drug and alcohol testing history of applicants	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Deficiencies in process of checking previous drug and alcohol testing records</i> Subrecipient must submit a process for ensuring that the previous drug and alcohol testing records of first-time safety sensitive employees are reviewed.	
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Document #7: MIS reports for past three years for subrecipient and sample of contractors			Finding and Corrective action	Comments
7. Does the subrecipient have MIS reports for past three years for subrecipient and sample of contractors	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Random testing rate below required level</i> Subrecipient must submit a plan to bring the random testing rate to the required level.	
a. Is the random test rate below the required level? Annual rates: 25% for drugs. 10% for alcohol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No		

On Site Visit Document Review

Document #1: Accident files and reports			Finding and Corrective action	Comments
1. Is there evidence of post-accident testing (if applicable)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>No evidence of testing after accidents</i> Subrecipient must submit a process for making proper post-accident determinations, including procedures to ensure post-accident testing	

Document #2: Monitoring reports of laboratories, collection services, or other vendors in the program			Finding and Corrective action	Comments

<p>2. Monitoring reports of laboratories, collection services, or other vendors in the program</p>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<p><i>Drug and/or alcohol program vendors not properly monitored</i></p> <p>Subrecipient must submit executed contract(s) with vendor(s) and monitoring procedures.</p>	
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Equal Employment Opportunity

Subrecipients with 50 or more transit related employees and either a) requests or received in excess of \$1M in capital and/or operating assistance or requests or b) receives in excess of \$250K in planning assistance.

If option is red & underlined, see finding and corrective action

Document #1: EEO Program Submitted and Approved by OCTA (if applicable)			Finding & Corrective action	Comments
1. Does the subrecipient have an EEO Program Submitted and Approved by OCTA?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>EEO program not submitted or expired</i></p> <p>Subrecipient must develop a EEO program that meets the FTA requirements</p>	

Document #2: Job description for EEO Officer			Finding & Corrective action	Comments
2. Does the subrecipient have a job description for EEO Officer?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Inadequate designation of EEO Officer</i></p> <p>Subrecipient must designate an EEO officer and ensure EEO officer has a clear reporting relationship to the CEO.</p>	
a. Does the EEO officer have a clear reporting relationship to the CEO?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>Inadequate designation of EEO Officer</i></p>	
b. Is the EEO officer responsible for processing EEO complaints?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p>Direct subrecipient to change the EEO officer reporting relationship and job description as needed</p>	

Document #3: Workforce utilization analysis			Finding & Corrective action	Comments
3. Does the subrecipient have workforce utilization analysis?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> <u>No</u>	<p><i>EEO utilization analysis deficiency</i></p> <p>Subrecipient must complete a workforce utilization analysis and develop procedures to ensure</p>	

			analysis is submitted on time annually	
a. If yes: Does the analysis include a justification for why prior EEO goals were not met (if applicable)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>EEO utilization analysis deficiency</i> Direct subrecipient to revise the workforce utilization analysis as needed	

Document #4: Employment practice analysis			Finding & Corrective action	Comments
4. Does the subrecipient have employment practice analysis?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Employment practice analysis deficiencies</i> Subrecipient must develop a narrative description and statistical analysis of its employment practices	
a. If Yes: Does the analysis contain a narrative description of the subrecipient's employment practices?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>Employment practice analysis deficiencies</i> Direct subrecipient to revise the employment practice analysis as needed	
b. Does the analysis contain a statistical analysis of employment practices?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		

Document #5: EEO management reports			Finding & Corrective action	Comments
5. Does the subrecipient have EEO management reports?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>EEO monitoring/reporting system deficiencies</i> Subrecipient must develop documentation of what is being monitored and reported to management	

On Site Documentation Review

Document #6: EEO complaints			Finding and Corrective action	Comments
1. Has the subrecipient taken action to	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<i>EEO complaints not resolved</i>	

investigate and resolve the complaints?			Direct subrecipient to investigate and resolve any outstanding EEO complaints.	
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Appendix E

FTA Compliance Review Document Checklist

FTA Compliance Review Document Checklist

Financial Management and Capacity Documents Required Before Site Visit

All Subrecipients

1. Written financial policies and procedures
2. Audited financial statements for the past three years
3. A-133 Single Audit Reports management letter comments for the past three years
4. Comprehensive annual financial Report (CAFR)
5. OIG or GAO audit reports with findings relating to FTA
6. Three to five year capital and operating financial plan
7. Documentation of matching funds
8. Cost allocation plan and cognizant agency correspondence/approval (only if subrecipient charges indirect costs)

Legal Documents Required Before Site Visit

All Subrecipients

1. Documentation that proper disclosures have been made and filed with the grantee on the OMB Standard Form LLL

Technical Documents Required Before Site Visit

All Subrecipients

1. Grant administration procedures, if written
2. Grant closeout schedule and list of subgrants with 95% expenditures complete (<i>If OCTA has this information, there is no need to ask subrecipient</i>).
3. Force accounts plans/ justifications/ approvals (if applicable)
4. Quarterly reporting documents (MPR/FFR inputs) (<i>If OCTA project manager has this information, there is no need to ask subrecipient</i>)
5. Oversight procedures for contractors (<i>if subrecipient is using contractors on FTA funded project</i>)
6. Procedures for technical inspection/supervision of capital projects, and progress reports (<i>if a capital project</i>)

Technical Documents Required at Site Visit

The documents below are applicable for subrecipients working on capital projects

1. Construction logs and diaries
2. Davis Bacon Wage Rate Posters (reviewed on site)

Maintenance Documents Required Before Site Visit

All Subrecipients with FTA funded rolling stock or FTA funded facilities – delete as appropriate

1. List of contractors who maintain FTA-funded assets
2. Maintenance plan/checklists
a. Vehicles (including rail and ferry, if applicable)
b. Facilities
c. Equipment
3. Manufacturer’s recommended preventive maintenance schedules for vehicles, equipment, and facilities
4. List of vehicles and equipment under warranty
5. Contractor oversight procedures

Maintenance Documents Required at Site Visit

All Subrecipients with FTA funded rolling stock or FTA funded facilities – delete as appropriate

1. PM inspection records
a. Directly operated vehicles
b. Contractor-operated vehicles
c. Facilities
d. Equipment
e. ADA accessibility features
2. Procedure for warranty claims

ADA Documents Required Before Site Visit

All subrecipients that

- *Have FTA funded facilities, or*
- *Operate fixed route services, or*
- *Operate demand response*

Delete as appropriate to service / facilities provided

1. Operations policies for serving persons with disabilities
2. ADA complementary paratransit eligibility application and eligibility & appeal decision letters
3. Data on the trip denial rate, on-time performance rate, number of missed trips, and number of excessively long trips for ADA complementary paratransit service for the current and previous two years.
4. Operating policies regarding ADA paratransit trip reservations and scheduling
5. No-show/late cancellation policy, if applicable, and records of actions (suspensions, appeals) taken
6. Complaint process

Title VI Documents Required Before Site Visit

All Subrecipients.

Note: Some documents listed below apply only to areas with over 200,000 UZA –only request applicable documents

1. Title VI complaint process and complaints
2. Equity analysis for facility siting (if facility sited after October 1 st 2012)
3. Documentation of LEP Analysis/Implementation Plan/Language Assistance Plan
4. Demographic data/analyses (over 200,000 UZA)
5. Service standards/policies (over 200,000 UZA)
6. Documentation of service monitoring to identify disparities (over 200,000 UZA)
7. Documentation of equity analysis for fare or service changes (over 200,000 UZA)

Procurement Documents Required Before Site Visit

All Subrecipients.

1. Written procurement policies and procedures including standards of conduct, organizational conflict of interest, and protest procedure
2. Contract Administration System Procedures
3. List of prequalification criteria (if applicable)
4. List of FTA funded capital and operating procurements over the last 2 years or since the last review (whichever is most recent)

Procurement Documents Required At Site Visit

The provided list of FTA funded capital and operating procurements will be used by OCTA to determine a sample of procurement files to review on-site.

Document 5 relates to *procurements of steel, iron, and manufactured products, except for products with a waiver or purchases under the simplified acquisition threshold (currently \$100,000)*

5. Pre and Post Delivery Buy America certifications
--

DBE Documents Required Before Site Visit

All subrecipients with over \$250K in FTA contracting opportunities (not including revenue vehicles)

1. Submitted and Approved DBE Program
2. Goal methodology and current goal
3. DBELO job description and organizational chart showing relationship of DBELO
4. DBE Uniform Reports
5. DBE goal shortfall analysis (this is applicable to subrecipients that have not previously met their DBELO program goals)
6. Good faith effort documentation
7. Compliance monitoring reports

Satisfactory Continuing Control Documents Required Before Site Visit

All subrecipients – but different documentation is required for the different types of projects that FTA funds (property, equipment, rolling stock). Only request applicable documents from subrecipient.

1. Procedures for maintaining control of FTA funded property, equipment, and rolling stock (if applicable)
2. Property records of federally funded equipment and rolling stock (if applicable)
3. Listing of real property, equipment, and vehicles removed from transit service (if applicable)
4. Evidence of most recent inventory reconciliation (if applicable)
5. Excess real property inventory/ utilization plan (if applicable)
6. Bus Fleet Contingency Plan (if applicable)
7. Documentation of peak vehicle requirements for fixed route service (if applicable)

Planning/Program of Projects Documents Required Before Site Visit

All Subrecipients

1. Evidence of Participation in Coordinated Planning Process (5310)
2. MPO's public participation plan procedures (if applicable)
3. Public notice of the POP

Public Comment on Fare and Service Changes Documents Required Before Site Visit

1. <i>All subrecipients operating fixed route service.</i> Description of procedures for public comment on fare increases and major service reductions
2. Documentation from fare increases and major service reductions implemented since last review

Half Fare Documents Required Before Site Visit

All subrecipients operating fixed route service

1. Fare structure description
2. Half fare program description
3. Half fare public information
4. Half fare ID application

Charter Bus Documents Required Before Site Visit

All subrecipients operating Charter Services

1. Quarterly reports to FTA

School Bus Documents Required Before Site Visit

All subrecipients operating School Bus services

1. Bus schedules showing tripper routes as part of regularly scheduled routes (if applicable)

Drug and Alcohol Program Documents Required Before Site Visit

All FTA subrecipients with safety sensitive employees

1. Drug-free workplace policy
2. Drug and alcohol policy
3. Post-accident decision form, if used
4. List of supervisors and other officials responsible for making reasonable suspicion testing decisions
5. Training records of supervisors and other officials responsible for making reasonable suspicion testing decisions
6. Form requesting drug and alcohol testing history of applicants
7. MIS reports for past three years for subrecipient and sample of contractors

Drug and Alcohol Program Documents Required at Site Visit

1. Accident files and reports
2. Monitoring reports of laboratories, collection services, or other vendors in the program

EEO Documents Required Before Site Visit

Subrecipients with 50 or more transit related employees and either a) requests or received in excess of \$1M in capital and/or operating assistance or requests or b) receives in excess of \$250K in planning assistance.

1. Submitted and Approved EEO Program (if applicable)
2. Job description for EEO officer
3. Workforce utilization analysis
4. Employment practice analysis
5. EEO management reports

EEO Documents Required at Site Visit

1. EEO complaints

Appendix F

Letter to Subrecipients Desk Review

Letter to Subrecipients – Desk Review

Mr./Mrs.

Executive Director

[Subrecipient]

Street Address

City, State, Zip

Re: FTA Subrecipient Compliance Review and Information Request

Dear Mr./Mrs Executive Director:

The Orange County Transportation Authority (OCTA) is conducting a Subrecipient Compliance Review of your agency. This annual desk based review determines whether a subrecipient is administering its FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions. It assesses subrecipient management practices and program implementation to ensure that the programs are administered in accordance with FTA requirements and are meeting program objectives.

Please find attached a Subrecipient Information Request which provides instructions and document requests. If you believe any document requested is not applicable to your organisation, please explain why. Your responses to this request will support our assessment of your agency's compliance with federal requirements.

Please send the requested information to OCTA by [insert date].

The findings and any corrective actions will be discussed with you following the review. If you have any questions about the review, the discussion items or the documentation required, please contact [insert project manager name and contact information].

Sincerely,

[Name]

[Title, Department]

Appendix G

Letter to Subrecipients On-Site Review

Letter to Subrecipients – On-Site Review

Mr./Mrs.

Executive Director

[Subrecipient]

Street Address

City, State, Zip

Re: FTA Subrecipient Compliance Review and Information Request

Dear Mr./Mrs Executive Director:

The Orange County Transportation Authority (OCTA) plans on conducting a Subrecipient Compliance Review of your agency on [insert date]. The review will determine whether you are administering your FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions and our subrecipient agreement. The purpose of the review is to assess your management practices and program implementation to ensure that programs are administered in accordance with FTA requirements and are meeting program objectives.

Our process begins with the attached Subrecipient Information Request which provides instructions and document requests. Your responses to this request will support our assessment of your agency's compliance with federal requirements.

Please send the requested information to OCTA by August 4, 2014. If you believe any document requested is not applicable to your organisation, please explain why. This document request includes a list of procurement files, as the Review Team will wish to review a sample of files on site. The sample of files will be determined before the site visit.

Please have members of your staff who are familiar with the topics and related issues available during the site visit so that our time together will be as productive as possible.

If you have any questions about the review, the discussion items or the documentation required, please contact [insert project manager name and contact information]. We look forward to a meaningful and successful visit. Thank you.

Sincerely,

[Name]

[Title, Department]

Appendix H

Letter to Recipients Pre-Visit

Letter to Recipients – Pre-Visit Information Report

Mr./Mrs.
Executive Director
[Subrecipient]
Street Address
City, State, Zip

Re: FTA Subrecipient Compliance Review and Information Request

Dear Mr./Mrs Executive Director:

The Orange County Transportation Authority (OCTA) will be conducting a Subrecipient Compliance Review of your agency. The review will determine whether you are administering your FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions and our subrecipient agreement. The purpose of the review is to assess your management practices and program implementation to ensure that programs are administered in accordance with FTA requirements and are meeting program objectives.

On [date] we sent you a Subrecipient Information Request providing instructions and document requests. Thank you for the documents you have sent us.

In order for your agency to prepare for the on-site review, we have provided you with our initial review of the documents received so far. This outlines the documents received, missing documents and any issues with submitted documents outlined under the 'comments' sections.. Please review the attached report in advance of the site-visit. Please have all outstanding documents available for the Review Team at the site visit and ensure all relevant staff members are available for interview.

As agreed, the site visit will occur [dates]. This will start with an Entrance Conference [time date] introducing the Review Team, and will conclude with an Exit Conference at [time/date] to discuss the preliminary findings. During the review the team will undertake interviews, review documentation and visit and inspect federally funded facilities, vehicles and other major assets.

If you have any questions about the Pre-Visit Information report or the review activities, please contact [insert project manager name and contact information]. We look forward to a meaningful and successful visit. Thank you.

Sincerely,

[Name]
[Title, Department]

Appendix I

Procurement File Review Checklist

Procurement File Checklist

- Micro-purchase threshold \$3,000
- Small purchase threshold, as outlined in subrecipient procurement manual. For FTA procurements this may range from \$3,000 to \$100,000
- RFP or IFB threshold. Anything above small purchase.
- Sole source procurement – only if other awards are infeasible

Contract:			Contract Value:		
REQUIREMENT		FTA C 4220.1F REFERENCES	ND	D	Comments
<i>Selection Procedures</i>	The subrecipient has written selection procedures and the solicitation also identifies all requirements that offerors must fulfill and all other factors to be used in evaluating bids or proposals. All procurements over small purchase threshold	<i>Ch. III, §3d(1)(c)</i>			
<i>Independent Cost Estimate</i>	The subrecipient made and documented an independent cost estimate before receipt of proposals. All procurements over micro-purchase threshold	Ch. VI, §6			
<i>Cost/Price Analysis</i>	Either a cost analysis, with associated profit negotiation, or a price analysis was performed and documented in the procurement file with respect to the initial contract award. Also cost analysis was performed when negotiating contract modifications unless price reasonableness was established on the basis of a catalog or market price of a commercial product sold in substantial quantities to the general public or on the basis of prices set by law or regulation. All procurements over micro-purchase threshold	<i>Ch. VI, §6</i>			

Contract:			Contract Value:		
REQUIREMENT		FTA C 4220.1F REFERENCES	ND	D	Comments
<i>Responsibility Determination</i>	The subrecipient made a determination that it was awarding to a responsible contractor considering such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. This is done through evidence of a SAM check www.sam.gov . All procurements over a small purchase threshold.	<i>Ch. VI, §8.b</i>			
<i>Justification for Noncompetitive Awards</i>	The contract file contains documentation that award of a contract was infeasible under small purchase procedures, sealed bids, or competitive proposals and at least one of the following circumstances applies: (1) The item was available only from a single source. (2) Public exigency for the requirement did not permit a delay resulting from a competitive solicitation. (3) An emergency for the requirement did not permit a delay resulting from a competitive solicitation. (4) The FTA authorized noncompetitive negotiations. (5) Competition was determined inadequate after solicitation of a number of sources. For sole source procurements (above micro-purchase threshold)	<i>Ch VI, §3.i(1)(b)</i>			
<i>No excessive bonding requirements</i>	No unreasonable requirements are placed on firms in order for them to qualify to do business. Above small purchase threshold	<i>Ch. VI, §2.h(1)(f)</i>			
<i>No exclusionary specifications</i>	The solicitation does not contain unreasonable requirements placed on firms in order for them to qualify to do business. Above micro-purchase threshold	<i>Ch. VI, §2.a(4)</i>			

Contract:			Contract Value:		
REQUIREMENT		FTA C 4220.1F REFERENCES	ND	D	Comments
<i>No geographic preferences</i>	Except when procuring A&E services, no in-State or local geographical preferences are allowed in the evaluation of bids or proposals unless Federal statutes expressly mandate or encourage geographic preference. Above micro-purchase threshold	<i>Ch. VI, §2.a(4)(g)</i>			
<i>Evaluation of Options</i>	The option quantities or periods contained in the contractor's bid or offer were evaluated in order to determine contract award. (To be eligible for Federal funding, options must be evaluated as part of the price evaluation of offers, or must be treated as sole source awards.) If the contract does not contain options, state NA. Above micro-purchase threshold	<i>Ch. VI, §7.b</i>			
<i>Exercise of Options</i>	The subrecipient exercised an option on this contract adhering to the terms and conditions of the option stated in the contract and determined that the option price was better than prices available in the market or that the option was a more advantageous offer at the time the option was exercised. If an option was not exercised under this contract, state NA. For procurements above micro-purchase level	<i>Ch. V, §7.a</i>			
<i>Lobbying Certifications Signed by Contractors</i>	For procurements > \$100,000	<i>§3.d(1)</i>			
<i>Buy America Provisions in Solicitation or Contract</i>	Procurements of steel, iron or manufactured products > \$100,000	<i>Ch VI §16.a</i>			

Contract:			Contract Value:		
REQUIREMENT		FTA C 4220.1F REFERENCES	ND	D	Comments
<i>Time and Materials Type Contract</i>	If this is a time and materials contract; the subrecipient determined that no other type of contract is suitable; and the contract specifies a ceiling price. If this is not a time and materials contract, check NA. Procurements above micro-purchase threshold	<i>Ch VI, §2.c.(2)(b)</i>			
<i>Qualifications Based Procurement Requirements</i>	This solicitation did not contain unreasonable requirements placed on firms in order for them to qualify to do business. Procurements above micro-purchase threshold	<i>Ch VI, 2. a. (4) (a)</i>			
<i>Liquidated Damages Clause</i>	This contract contains liquidated damages provisions and the assessment for damages is specified in the contract at a specific rate per day for each day of overrun in contract time. If this contract does not contain liquidated damages provisions, check NA. Procurements above micro-purchase threshold	<i>Ch IV, 2.b.(6)(b) 1)</i>			
<i>Change Order Documentation</i>	The subrecipient amended this contract outside the scope of the original contract. The amendment was treated as a sole source procurement (complying with the FTA requirements for a justification, cost analysis and profit negotiation). If the contract was not modified or if all reviewed modifications were within the scope of the contract, check Not Applicable. All procurements above the micro-purchase threshold				

Contract:			Contract Value:		
REQUIREMENT		FTA C 4220.1F REFERENCES	ND	D	Comments
<i>Contract Clauses</i>	<p>This contract contains the appropriate FTA required clauses (see separate summary sheet on following page). Above micro-purchase threshold</p> <p>The Master Agreement should be used to determine the applicability of the clauses to the procurement type. FTA C 4220.1F, Appendix D, and The Best Practices Procurement Manual, Appendix A.1, can be used to determine the applicability of the specific language of a clause that a grantee may use.</p>				

APPLICABILITY OF THIRD PARTY CONTRACT PROVISIONS

(excluding micro-purchases, except Davis-Bacon requirements apply to contracts exceeding \$2,000)

PROVISION	Professional Services/A&E	Operations/ Management	Rolling Stock Purchases	Construction	Materials & Supplies
No Federal Government Obligations to Third Parties (by Use of a Disclaimer)	All	All	All	All	All
False Statements or Claims Civil and Criminal Fraud	All	All	All	All	All
Access to Third Party Contract Records	All	All	All	All	All
Changes to Federal Requirements	All	All	All	All	All
Termination	>\$10,000 if 49 CFR Part 18 applies.	>\$10,000 if 49 CFR Part 18 applies.	>\$10,000 if 49 CFR Part 18 applies.	>\$10,000 if 49 CFR Part 18 applies.	>\$10,000 if 49 CFR Part 18 applies.
Civil Rights (Title VI, EEO, ADA)	>\$10,000	>\$10,000	>\$10,000	>\$10,000	>\$10,000
Disadvantaged Business Enterprises (DBEs)	All	All	All	All	All
Incorporation of FTA Terms	All	All	All	All	All
Debarment and Suspension	>\$25,000	>\$25,000	>\$25,000	>\$25,000	>\$25,000
Buy America			>\$100,000	>\$100,000	>\$100,000
Resolution of Disputes, Breaches, or Other Litigation	>\$100,000	>\$100,000	>\$100,000	>\$100,000	>\$100,000
Lobbying	>\$100,000	>\$100,000	>\$100,000	>\$100,000	>\$100,000
Clean Air	>\$100,000	>\$100,000	>\$100,000	>\$100,000	>\$100,000
Clean Water	>\$100,000	>\$100,000	>\$100,000	>\$100,000	>\$100,000
Cargo Preference			For property transported by ocean vessel.	For property transported by ocean vessel.	For property transported by ocean vessel.
Fly America	For foreign air transport or travel.	For foreign air transport or travel.	For foreign air transport or travel.	For foreign air transport or travel.	For foreign air transport or travel.
Davis-Bacon Act				>\$2,000 (including ferry vessels)	

PROVISION	Professional Services/A&E	Operations/ Management	Rolling Stock Purchases	Construction	Materials & Supplies
Contract Work Hours and Safety Standards Act		>\$100,000 (except transportation services)	>\$100,000	>\$100,000 (including ferry vessels)	
Copeland Anti-Kickback Act Section 1 Section 2				All All exceeding \$2,000 (including ferry vessels)	
Bonding				\$100,000	
Seismic Safety	A&E for New Buildings & Additions			New Buildings	
Transit Employee Protective Arrangements		Transit Operations			
Charter Service Operations		All			
School Bus Operations		All			
Drug Use and Testing		Transit Operations			
Alcohol Misuse and Testing		Transit Operations			
Patent Rights	Research & Development				
Rights in Data and Copyright Requirements	Research & Development				
Energy Conservation	All	All	All	All	All
Recycled Products		Contracts for items designated by EPA, when procuring \$10,000 or more per year		Contracts for items designated by EPA, when procuring \$10,000 or more per year	Contracts for items designated by EPA, when procuring \$10,000 or more per year
Conformance with ITS National Architecture	ITS Projects	ITS Projects	ITS Projects	ITS Projects	ITS Projects
ADA Access	A&E	All	All	All	All
Notification of Federal Participation for States	Limited to States	Limited to States	Limited to States	Limited to States	Limited to States

Appendix J

FTA Compliance Review Report

FTA Compliance Review Report

Contract Number

Project Manager

Project Title

Division

Subrecipient/ Agency

Contract Value

Payments to Date

Draft Report Date:		Draft Report Status (Version no. or FINAL)	
Desk Review Request Date:		Site Visit Dates (where applicable)	

Report Prepared by:	
Report Reviewed by (date):	

Purpose

This report summarizes the findings from the Subrecipient Oversight Monitoring Review undertaken by OCTA. It highlights any deficiencies found and outlines the corrective actions required along with the timelines for completing these activities.

The Formal Compliance Review forms part of the OCTA Subrecipient Monitoring Procedures which are designed to:

- Ensure that all technical specifications and cooperative/subrecipient agreement requirements are met by subrecipients
- Monitor compliance with FTA requirements for FTA-funded vehicles or facilities that are maintained by subrecipients
- Monitor compliance with FTA requirements for transit services provided by subrecipients
- Identify performance issues and non-compliance with FTA requirements; address them in a timely manner
- Track information regarding performance quality for the purposes of evaluating subrecipients for future grant awards

Approach

[Amend based on whether the review was desk based or on site.]

This report outlines the findings from the [desk / on site] compliance review.

A desk review is completed annually for all Subrecipients. Formal on-site compliance reviews are undertaken for each subrecipient a minimum of once every 24 months. The Site visit review frequency is based on the level of risk associated with each subrecipient or project.

[Subrecipients] last desk review occurred [date] and previous onsite review was completed on [date]

The review team requested relevant documents from [subrecipient] in advance of the site visit. These were reviewed to determine whether compliance or information gaps existed. [Subrecipient] was given a list of the identified performance gaps before the site visit to enable their preparation for the discussion during the on-site review.

During the site visit, administrative and statutory requirements were discussed and documents were reviewed. [Subrecipients]'s transit facilities were toured to provide an overview of activities related to FTA-funded projects.

The subrecipient was assessed in the following areas, as required by FTA requirements *[delete as necessary]*

- Financial Management and Capacity
- Legal

- Technical Capacity
- Satisfactory Continuing Control
- Title VI
- Procurement
- DBE
- Maintenance
- ADA
- Half Fare
- Charter Bus
- School Bus
- Drug free workplace and drug and alcohol program
- EEO
- Public Comment
- Planning/Program of Projects

Findings and Corrective Actions

As a result of the site visit, the FTA subrecipient was found not deficient in [XXXX] areas. Deficiencies were found in [xxx] areas. All areas reviews are summarized in the chart below, as well as corrective actions and due dates. There were no repeat deficiencies. (If there were repeat deficiencies from previous reviews, they would be noted here)

A draft of this report along with any corrective actions has been shared with [subrecipient] for comment. The final report has been submitted to the OCTA CEO for transmittal to the subrecipient.

The status of any corrective actions will be tracked by the OCTA project manager, who will determine when action requirements have been met. Failure to deliver the corrective actions in the agreed timeframe may lead to future payments being withheld.

Definitions

The metrics used to evaluate whether a Subrecipient is meeting the requirements for each of the areas reviewed are:

- No Finding: During the review, no findings were noted with the subrecipient's implementation of the FTA requirements.
- Finding: Subrecipient is missing documentation or the documentation provided is missing key FTA requirements.
- Open Action Items: Subrecipients have not yet had to comply with particular Federal Requirements, but will need to do so in the future. For example, a facility capital project does not need a facility or equipment maintenance program during building phases, but the subrecipient should submit a program to OCTA before the facility is operational.

- *Not Applicable*: An area can be deemed not applicable if, after an initial assessment, the subrecipient does not conduct activities for which the requirements of the respective area would be applicable.

Subrecipient Description

[Provide brief summary of the subrecipient and the grant activity (projects currently underway, or completed since the last review)]

Summary of Findings

The table below outlines the findings and deficiencies for all the relevant review areas.

Review Area	Finding	Deficiency	Corrective Action	Response Due Date	Date Closed
Financial Management and Capacity					
Legal					
Technical Capacity					
Satisfactory Continuing Control					
Title VI					
Procurement					
DBE					
Maintenance					
ADA					

Half Fare					
Charter Bus					
School Bus					
Drug free workplace and drug and alcohol program					
EEO					
Public Comment					
Planning/Program of Projects					

[For Capital Projects – this table can be used to document and track any additional Capital Project findings]

The table below lists the findings from the Capital Project Review Checklist:

Review Area	Finding	Deficiency	Corrective Action	Response Due Date	Date Closed
Project/ Program Management					
Construction Administration and Contractor Compliance					

Appendix K

Letter to Subrecipients Draft Compliance Report

Letter to Subrecipients – Draft Compliance Report

Mr./Mrs.

Executive Director

[Subrecipient]

Street Address

City, State, Zip

Re: FTA Subrecipient Compliance Report

Dear Mr./Mrs Executive Director:

As you know, the Orange County Transportation Authority (OCTA) recently undertook a Subrecipient Compliance Review of your agency.

This review determines whether a subrecipient is administering its FTA-funded programs in accordance with 49 U.S.C. Chapter 53, Federal transit law provisions. It assesses subrecipient management practices and program implementation to ensure that the programs are administered in accordance with FTA requirements and are meeting program objectives.

The review focused on [subrecipients] compliance in [#] areas. No deficiencies were found with FTA requirements in [#] areas. Deficiencies were found in [#] areas [LIST]. [Subrecipient] had [#] repeat deficiencies from the previous [date] Subrecipient Compliance Review , in the areas of [LIST].

Please find attached a draft Compliance Review Report, outlining these findings and the corrective actions.

Please review this draft report for accuracy and provide your comments to the Review Team Leader within ten business days from the date of this letter. A final report, that incorporates your comments to the draft report, will be provided to you within [#] business days of your response.

Thank you for your cooperation and assistance during this Subrecipient Compliance Review. If you have any questions, please do not hesitate to contact [review team leader name and contact info].

Sincerely,

[Name]

[Title, Department]

Appendix L

FTA Subrecipient Closeout Review Checklist

FTA Subrecipient Closeout Review Checklist

Contract Number _____

Project Manager _____

Project Title _____

Division _____

Subrecipient/
Agency _____

Contract Value _____

		Date completed	Comments
1. All products or services requested were provided? Check against:			
a. Cooperative agreement	<input type="checkbox"/> Yes <input type="checkbox"/> No		
b. Quarterly Progress reports	<input type="checkbox"/> Yes <input type="checkbox"/> No		
c. Change requests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
d. Other. Please describe:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
2. Proof of completion			
a. Site visit by OCTA staff <i>Include written attestation</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
b. Photographic evidence <i>Include</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
c. Documentation adequately shows receipt and formal acceptance of all contract items	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

<i>Include</i>			
d. Other proof. Please describe: <i>Include</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
3. Patent rights or ownership rights have been transferred to OCTA <i>Include documentation if applicable</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
4. Contractor has assigned all guarantees and warranties to OCTA <i>Warranty information if applicable</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
5. All actions related to contract price revisions and changes are concluded <i>Include copies of any change agreements, including supporting information such as cost analysis and records of negotiations</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No		
6. No claims or investigations are pending	<input type="checkbox"/> Yes <input type="checkbox"/> No		
7. Any subcontracting issues are settled	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
8. If partial or complete termination was involved, action is complete	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
9. Final Invoice Submitted and approved for payment by	<input type="checkbox"/> Yes <input type="checkbox"/> No		

Project Manager <i>Include copy of Invoice and Invoice Review checklist</i>			
10. Final Financial report	<input type="checkbox"/> Yes <input type="checkbox"/> No		
11. Final Budget revision completed reflecting project cost by scope and activity	<input type="checkbox"/> Yes <input type="checkbox"/> No		
12 Request to deobligate any unexpended balance of Federal funds as applicable	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
13 Final narrative milestone/progress report including a discussion of each activity line item contained in the final budget	<input type="checkbox"/> Yes <input type="checkbox"/> No		
14. List of equipment purchased under the grant <i>Include</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
15. Any other documentation required under the conditions of the grant. Please specify	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
For Constriction contracts:			
16. Any required contract audit or labor standard final approvals are completed	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

<i>Include certified payroll reports or other proof</i>			
17. OCTA has completed a Final Inspection <i>Include Final Inspection Report</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Performance Summary

Original Planned Start Date:		Original Planned Finish Date	
Actual Start date:		Actual Finish Date	

Original Contract Price		Original Planned Match Funding (%)	
Final Contract Price		Actual Planned Match Funding (%)	

Is there an unexpected balance of Federal Funds?	<input type="checkbox"/> Yes <input type="checkbox"/> No
---	--

		Signature	Date
Completed By	Project Manager		
Approved By	Senior Management		

Appendix M

Capital Project FTA Subrecipient Monitoring Checklist Sample

Capital Project FTA Subrecipient Monitoring Checklist

Contract Number	Project Manager
Project Title _____	Division _____
Subrecipient/ Agency _____	Contract Value _____
Contract Start Date _____	Contract End Date _____
Date of Checklist _____	_____

As part of OCTA’s subrecipient monitoring, OCTA should ensure that subrecipients are adequately monitoring their projects and contractors, and that the required Quality Assurance controls are in place. The below checklist is intended to facilitate this monitoring process, and can be used at all relevant review points (first Quarterly Report after project commences, Formal Compliance Reviews).

Project/ Program Management

Area		Evident, Appropriate & Acceptable Quality?	Comment
Project / program management & documentation	Project management plan Including: clearly defined roles and responsibilities; reporting and decision making approaches	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Document / information management system	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Project Management resources sufficient	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Financial management and Procurement	Financial and activity tracking against planed budget and forecast milestones/ activities	<input type="checkbox"/> Yes <input type="checkbox"/> No	

	Compliance with procurement regulations (see Procurement Section in Compliance Review Document Checklist)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Financial management system ties with grant expenditures and reporting guidelines (see Financial Management in Compliance Review Document Checklist)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
On site monitoring and reporting	Project schedule with contractor milestones	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Recurring oversight plan and reporting.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Reflective practice: Lessons learned, before and after studies	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Safety and Security and Emergency oversight	Safety and security management plan.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Activity complies to FTA's Project and Construction Management Guidelines	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Change Management	Procedures and information systems to administer and track changes to their contractors' contracts and resolve claims	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Maintained claims files, change order files,	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Risk Management	Risk Management Procedures	<input type="checkbox"/> Yes <input type="checkbox"/> No	

	Risk and Issue Log	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Risk assessments and contingency reviews undertaken for project activities	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Design control	Design control documentation including standards, design criteria reports, and value engineering reports	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Quality Assurance/ Quality Control	Quality Management Plan including clarity over Quality Assurance and Quality Verification roles and activities for the project.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Communication	Communications plan and Stakeholder management plan where necessary	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Timely reporting of risks, issues, change requests and claims to OCTA	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Fleet Management	Fleet Management Plan	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Construction Administration and Contractor Compliance

Area		Evident, Appropriate & Good Quality?	Comment

Construction administration	Design drawings and construction documents	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Construction Contracts with clear specifications, terms and conditions	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Third Party Agreements (where necessary)	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Inspection and Testing Reports	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Contract Management Reports	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Technical Capacity	Evident within organization charts, roles and responsibilities	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Labor Compliance	Davis-Bacon compliance <i>Spot check construction logs/diaries against certified payrolls</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
EEO/Wage Rate Posters	EEO/ Wage Rate posters evident on construction site <i>Site visit to check posters clearly visible</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Buy America	Compliance with Buy America <i>Check construction area and contractors yard. Check all pre and post-delivery certifications</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
DBE contractors	Use of DBE contractors	<input type="checkbox"/> Yes <input type="checkbox"/> No	

	<i>Check on site use is in accordance with subrecipient comments</i>		
Contractor compliance with other relevant legislation and policies (please list)		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	

		Signature	Date
Completed By	Project Manager		
Approved By	Senior Management		

Appendix N

Opening Conference Template

[Name of Subrecipient]



**SUBRECIPIENT OVERSIGHT REVIEW
ENTRANCE CONFERENCE**

[DATE]
OCTA



Entrance Conference Agenda

- Introductions & Sign-In
- Presentation:
 - Overview of the Review process
 - Areas Reviewed
 - Site Visit Agenda
 - Source Documents for On-Site Review
 - Next Steps
- Onsite: Work space, working hours, availability of copying equipment
- General Discussion, Q & A

OCTA Subrecipient Monitoring Process

➤ Formal Compliance Reviews

- Desk review of submitted material**
- On-site review**
- Compliance review report**
- Corrective action monitoring**

➤ Ongoing Oversight

- Invoice Reviews**
- Quarterly Reporting**

Areas Reviewed

1. Financial Management & Capacity
2. Legal
3. Technical Capacity
4. Maintenance
5. Americans with Disabilities Act (ADA)
6. Title VI
7. Procurement
8. Disadvantaged Business Enterprise (DBE)
9. Satisfactory Continuing Control
10. Planning/Program of Projects
11. Public Comments
12. Half Fare
13. Charter Bus
14. School Bus
15. Drug-Free Workplace/Drug and Alcohol Program
16. Equal Opportunity Employment (EEO)

Site Visit Agenda

Day 1: [Date]

Time	Agenda Item
11:00-11:15 am	Introductions and Entrance Conference
11:15-12:30 pm	Legal Financial Management and Financial Capacity
12:30-1:00	Lunch
1:30-5:00 pm	Technical Satisfactory Continuing Control Planning/Program of Projects Title VI Procurement <i>Review of Procurement Files</i> Disadvantaged Business Enterprise Americans with Disabilities Act (ADA)

Site Visit Agenda

Day 2: [Date]	
Time	Agenda Item
8:30-10:30 am	Maintenance <i>Facility Tour/Review of PM records</i>
10:30-12:00 pm	Public Comment on Fare and Service Charges Half Fare Charter Bus School Bus
12:00-1:00 pm	Lunch
1:00-3:00 pm	Drug-Free Workplace and Drug and Alcohol Program Equal Employment Opportunity
3:00-4:00 pm	Wrap Up and Pre-Exit Conference
4:00 pm	Exit Conference

Source Documents Required for Onsite Review

- **Financial**

- Invoice Requests, Transactions, and Underlying Transactions

- **Procurement**

- Sample of Procurement File Documentation

- **Maintenance**

- Selection of Facility and Equipment Maintenance Records

- **Pre-Review Assessment Follow-Up Questions**

Next Steps

- Draft Report to **[Subrecipient]**
- **[Subrecipient]** must submit comments on Draft Report to OCTA Program Manager within 10 business days of receipt
 - **[Subrecipient]** may submit any corrective actions with the comments on the Draft Report for consideration.
- Final Report to **[Subrecipient]**
- Ongoing corrective action monitoring

Contact Us

[Program Manager Contact Information]



Appendix O

Closing Conference Template

[Name of Subrecipient]



**SUBRECIPIENT OVERSIGHT REVIEW
CLOSING CONFERENCE**

[DATE]
OCTA



Closing Conference Agenda

- Introductions & Sign-In
- Preliminary Findings and Corrective Actions
 - Open Action Items
 - Pending Documentation
- Next Steps
- Close

Preliminary Findings

Area	Finding	Deficiency	Corrective Action	Response Date
Financial Management & Capacity				
Legal				
Technical Capacity				
Maintenance				
ADA				
Title VI				
Procurement				

Preliminary Findings

Area	Finding	Deficiency	Corrective Action	Response Date
DBE				
Satisfactory Continuing Control				
Planning/Program of Projects				
Public Comment				
Half Fare				
Charter Bus				
School Bus				
Drug and Alcohol				
EEO				

Next Steps

- OCTA Program Manager Draft Compliance Review Report
- Draft Report to [Subrecipient]
- [Subrecipient] must submit comments on Draft Report to OCTA Program Manager within 10 business days of receipt
 - [Subrecipient] may submit any corrective actions with the comments on the Draft Report for consideration.
- Final Report to [Subrecipient]
- Ongoing corrective action monitoring

Contact Us

[Program Manager Contact Information]



Appendix P

Allowable Costs and Cost Allocation Plan Review

Allowable Costs and Cost Allocation Plan Review

Detailed guidance on determining allowable costs can be found within:

- OMB 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments)
- OMB 2 CFR, Part 230 (Cost Principles for Non-Profit Organizations)

The notes below summarize this guidance, but should not be regarded as definitive. The above guidance should be used to clarify any queries regarding allowable costs.

Basic guidelines

To be allowable under Federal awards, costs must be

- **Necessary, and reasonable** for proper and efficient performance of the organization and administration of Federal awards
- Allocable by Federal awards under the above OMB guidance, and conform to any limitations listed (see below for some examples)
- Authorized under **State or local laws or regulations**
- Consistent with policies, regulations and procedures
- Accorded consistent treatment with other costs incurred for the same purposes in similar circumstances
- Determined according to generally accepted accounting principles
- Not be included as a cost or used to meet any cost sharing or matching requirements of any other Federal award in the current or prior period (except when Federal approval is provided)
- The net of all applicable credits
- Adequately documented

Determining reasonable cost: Questions to ask

- Is the cost ordinary and necessary to achieve the Federal award/ outcomes?
- What are market prices for comparable goods or services?
- Did the individuals involved act prudently?
- Are there any restraints or requirements imposed (e.g. Federal regulations) which might have affected the cost?
- Was the approach undertaken appropriate, fitting with established practices?

Direct costs are those that can be identified specifically with a particular final cost objective.

- Compensation of employees devoted and identified specifically to the performance of the award,

- Cost of materials acquired, consumed or expended specifically for the purpose of the award,
- Equipment and other approved capital expenditures.

Minor direct cost items can be treated as an indirect cost for reasons of practicality. The accounting treatment must be consistently applied to all cost objectives.

Indirect costs are those included for a common or joint purpose benefiting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.

Cost Allocation Plan (CAP)

A Cost Allocation Plan (“CAP”) is intended to achieve more efficient and uniform administration of federal awards. It provides the foundation for greater uniformity in the costing procedures of nonfederal governments and in the reimbursement practices of federal agencies. It provides principles and standards for determining both direct and indirect costs applicable to Federal cost-based awards to governmental units.

Procedures for developing a CAP related to indirect costs (Note: this does not apply to not-for-profit subrecipients – please see relevant section below)

For the sub-recipient:

1. Determine what type of indirect costs rates apply. There are four possible types of indirect cost rates:

- a. A **provisional rate** is a temporary rate, agreed to in advance, and is based on anticipated future costs. It is subject to retroactive adjustment at a future date after costs are known.
- b. A **final rate** is established after the costs are known. It adjusts the provisional rate but is administratively burdensome. Underpayments resulting from application of the provisional rate are subject to availability of funds; while overpayments must be credited or returned (provisional rate and final rates are two stages of one approach).
- c. A **fixed rate** is also agreed to in advance, based on an estimate of future costs, but it is not retroactively adjusted. Instead, the difference between estimated and actual costs is carried forward to future years.
- d. A **predetermined rate** is agreed to in advance, based on an estimate of future costs, but is not subject to adjustment except under very unique circumstances. It is intended to be permanent and thereby reduce the administrative burden associated with indirect cost recovery. A predetermined rate may not be used for a sub-recipient that does not submit its indirect cost rate proposals to OCTA for negotiation.

2. Determine the allocation method for the indirect costs:

- a. Simplified method

b. Multiple allocation base method

3. Upon determining the rate and allocation method, an indirect cost proposal by the sub-recipient should be drafted, and certified thereafter. The draft should include the following:

- a. The rates proposed, including subsidiary work sheets and other relevant data, cross-referenced and reconciled to the financial data.
- b. A copy of the financial data upon which the rate is based, such as financial statements, comprehensive annual financial report, executive budgets, accounting reports
- c. The approximate amount of direct base costs incurred, broken out between salaries and wages and other direct costs. The sub-recipient should use the breakdown between the salaries and wages and other direct costs within the direct base costs to determine whether to establish the resulting indirect costs rate on the basis of the salaries and wages or modified total direct costs.
- d. A chart showing the organizational structure of the sub-recipient during the period for which the proposal applies, along with a functional statement(s) noting the duties and/or responsibilities of all units that comprise the sub-recipient. The organizational chart that is submitted with the indirect cost rate proposal should be accompanied by a narrative statement. This statement should provide sufficient detail about the functions that are performed by component units to permit OCTA to differentiate levels of benefit provided and received within the organization.

OCTA review process:

Following submission OCTA should undertake the following review of the CAP draft. Note: this could be undertaken by Finance and Administration, or Internal Audit (to be agreed)

Steps in the Review Process

1. Review the submission for materiality, completeness, and reliability of supporting data, including audited financial statements.
2. Acknowledge receipt and request any needed additional information.
3. Review prior negotiation and audit experience; assess prior agreements and applicable conditions.
4. Assess the submission's general reliability and the governmental unit's financial condition.
5. Determine the extent to which coordination with other awarding sub-recipients may be necessary.
6. Review the proposal for accuracy and determine whether it includes all activities and costs of the sub-recipient.
7. Determine whether unallowable costs have been excluded and whether allocation methods and billing mechanisms are appropriate and properly designed.
8. Assess what the appropriate rate base (salaries and wages, modified total direct costs) should be for the resulting indirect cost rate and the extent to which any rate established should be subsequently adjusted.

Establishing the amount of approved indirect costs in the award budget: OCTA should review indirect cost proposals and applications to determine which anticipated costs included are necessary, reasonable, and allocable.

If approved, OCTA should send notification to the subrecipient. The CAP and approval notice should be kept within the subrecipient file for audit if necessary.

The Subrecipient must also provide procedures for updating and submitting the plan annually. The CAP should be reviewed by the Review Team, through the Formal Compliance Review (see Appendix E. Financial Management). The CAP is requested as part of the annual desk review, and before the Compliance Review site visit.

Applying the rate of the direct cost base and calculating claims: Once the indirect cost rate is recognized as an award, the sub-recipient is permitted to apply that rate to the applicable base of the allowable direct costs incurred. Periodically the sub-recipient is expected to submit a Financial Status Report, which summarizes total expenditures incurred under the award. The sub-recipient may claim indirect costs by multiplying its indirect cost rate by the direct cost elements to which the rate may be applied under the terms of the award. Thus, its total cost recovery for the applicable period is comprised of the allowable direct costs incurred plus the allowable, allocable indirect costs.

Procedures for Non-profit organizations

Due to the diverse characteristics and accounting practices of **non-profit organizations**, it is not possible to specify the types of cost which may be classified as indirect costs in all situations. However, examples of indirect costs for many non-for-profit organizations include depreciation or use allowances on buildings and equipment, the costs of operating and maintaining facilities, and general administration and general expenses, such as the salaries and expenses of executive officers, personnel administration, and accounting.

Procedures for indirect costs related for non-for-profit organizations are the following:

For the sub-recipient:

1. Classify the indirect costs within two broad categories:
 - a. Facilities- should include depreciation and use allowances on buildings, equipment and capital improvement, interest on debt associated with certain buildings, equipment and capital improvements, and operations and maintenance expenses.
 - b. Administration- should include general administration and general expenses such as the director's office, accounting, personnel, library expenses and all other types of expenditures not listed specifically under facilities.

2. Determine what type of indirect costs rates apply. There are four possible types of indirect cost rates:

- a. A **provisional rate** is a temporary rate, agreed to in advance, and is based on anticipated future costs. It is subject to retroactive adjustment at a future date after costs are known.
- b. A **final rate** is established after the costs are known. It adjusts the provisional rate but is administratively burdensome. Underpayments resulting from application of the provisional rate are subject to availability of funds; while overpayments must be credited or returned (provisional rate and final rates are two stages of one approach).
- c. A **fixed rate** is also agreed to in advance, based on an estimate of future costs, but it is not retroactively adjusted. Instead, the difference between estimated and actual costs is carried forward to future years.
- d. A **predetermined rate** is agreed to in advance, based on an estimate of future costs, but is not subject to adjustment except under very unique circumstances. It is intended to be permanent and thereby reduce the administrative burden associated with indirect cost recovery. A predetermined rate may not be used for a sub-recipient that does not submit its indirect cost rate proposals to OCTA for negotiation.

2. Determine the indirect cost allocation method:

- a. Simplified allocation method
- b. Multiple allocation base method
- c. Direct allocation method

Direct Allocation Method: some non-profit organizations treat all costs as direct costs except general administration and general expenses. These organizations generally separate their costs into three basic categories: (i) General administration and general expenses, (ii) fundraising, and (iii) other direct functions (including projects performed under Federal awards). Joint costs, such as depreciation, rental costs, operation and maintenance of facilities, telephone expenses, and the like are prorated individually as direct costs to each category and to each award or other activity using a base most appropriate to the particular cost being prorated.

This method is acceptable, provided each joint cost is prorated using a base which accurately measures the benefits provided to each award or other activity. The bases must be established in accordance with reasonable criteria, and be supported by current data. This method is compatible with the Standards of Accounting and Financial Reporting for Voluntary Health and Welfare Organizations issued jointly by the National Health Council, Inc., the National Assembly of Voluntary Health and Social Welfare Organizations, and the United Way of America.

Under this method, indirect costs consist exclusively of general administration and general expenses.

3. Upon determining the rate and allocation method, an indirect cost proposal by the sub-recipient should be drafted, and negotiated thereafter.

Negotiation and approval rates: Rates will be negotiated between both the sub-recipient and OCTA (Finance and Administration, or Internal Audit TBC). All concerned Federal agencies shall be given the

opportunity to participate in the negotiation process but, after a rate has been agreed upon, it will be accepted by all Federal agencies.

Applying the rate of the direct cost base and calculating claims: Once the indirect cost rate is negotiated, the sub-recipient is permitted to apply that rate to the applicable base of the allowable direct costs incurred. The results of each negotiation shall be formalized in a written agreement between OCTA and the non-profit organization. OCTA shall distribute copies of the agreement to all concerned Federal agencies. If a dispute arises in a negotiation of an indirect cost rate between OCTA and the sub-recipient, the dispute shall be resolved in accordance with the appeals procedures of OCTA's agency.

**OCTA
Transit Security & Operations Center Title VI Equity
Analysis**



Orange County Transportation Authority

**Site Selection & Master Planning
for the
Transit Security & Operations Center (TSOC)**

Task 4f Deliverable

**Title VI Equity Analysis for TSOC
Final**

Draft – August 27, 2014

Final – June 30, 2015

Prepared by



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ACRONYMS

FTA.....	Federal Transit Administration
GIS.....	Geographic Information Systems
LEP.....	Limited English Proficiency
OCTA	Orange County Transportation Authority
PIP	Public Involvement Plan
ROW.....	Right-of-Way
TSOC	Transit Security Operations Center

1. BACKGROUND

1.1. TITLE VI POLICIES

This Title VI Equity Analysis is part of the Orange County Transportation Authority’s (OCTA) requirement to comply with Title VI of the Civil Rights Act. FTA circular C 4702.1B states that, when determining the site or location of facilities “The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or cited without regard to race, color, or national origin.” This Title VI Equity Analysis demonstrates the steps taken to minimally impact on Title VI communities in the siting of OCTA’s Transportation Security & Operations Center (TSOC).

Title VI of the Civil Rights Act of 1964 provides that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Since 1972, the Federal Transit Administration (FTA) has required recipients of Federal assistance to certify compliance with the requirements of Title VI as part of the funding eligibility process. As a recipient of Federal assistance, OCTA maintains compliance with Title VI. OCTA’s Title VI compliance plan takes into consideration minority, Limited English Proficiency (LEP), and low-income (80% of the national per capita income, (see Table 1-1) residents in Title VI Equity Analyses. These residents are hereafter referred to as Title VI residents or the Title VI population.

Table 1-1: 2013 Poverty Guidelines for Annual Income

Persons in a Family/Household	Poverty Guideline
1	\$11,490
2	\$15,510
3	\$19,530
4	\$23,550
5	\$27,570
6	\$31,590
7	\$35,610
8	\$39,630

* Add \$4,020 for each additional person above 8 people per family/household
 Source: US HHS, 2013

1.2. DESCRIPTION AND PURPOSE OF THE POTENTIAL PROJECT

OCTA's core operational and security functions are currently centralized at the Garden Grove Annex building (hereinafter referred to as "the Annex") located at 11800 Woodbury Road, Garden Grove, CA 92843. The existing facility currently houses the following OCTA functions:

- Operations Training (Bus)
- Central Communications (Bus)
- Field Operations (Bus)
- Transit Police Services (Bus, Paratransit, & Rail)
- Emergency Operations Center (Agency wide)
- File Storage

The current space at the Annex is not adequate for all of the above-listed functions. Furthermore, OCTA operations are projected to expand and there is not space in the Annex to accommodate this projected growth or the addition of new functions as needed. Additionally, structural upgrades to the Annex would require meeting essential services facility standards in California, which may not be feasible due to existing structural limitations at the Annex. The upgrades could also cause significant disruption to operations during construction.

As such, OCTA has initiated a feasibility and planning study for a new facility—TSOC—which will be designed to current essential services standards per the latest edition of the California Building Code. The proposed TSOC will generally house some of the Annex functions, provide adequate space for these functions, improve efficiency of room layouts, and provide space for future functions and/or expansion.

1.3. DEMOGRAPHIC OVERVIEW

1.3.1. ORANGE COUNTY

As shown in Table 1-2, Census data from the 2006-2010 American Community Survey (ACS) 5-year estimates show that 54.5 percent of Orange County's population is comprised of minority residents. Therefore, a census tract is considered a minority census tract if the minority population is greater than 54.5%, as it would have a disproportionately high minority population relative to the rest of the County. Figure 1-1 shows census tracts in Orange County have a minority population greater than 54.5%.

Table 1-2: Orange County Area Population

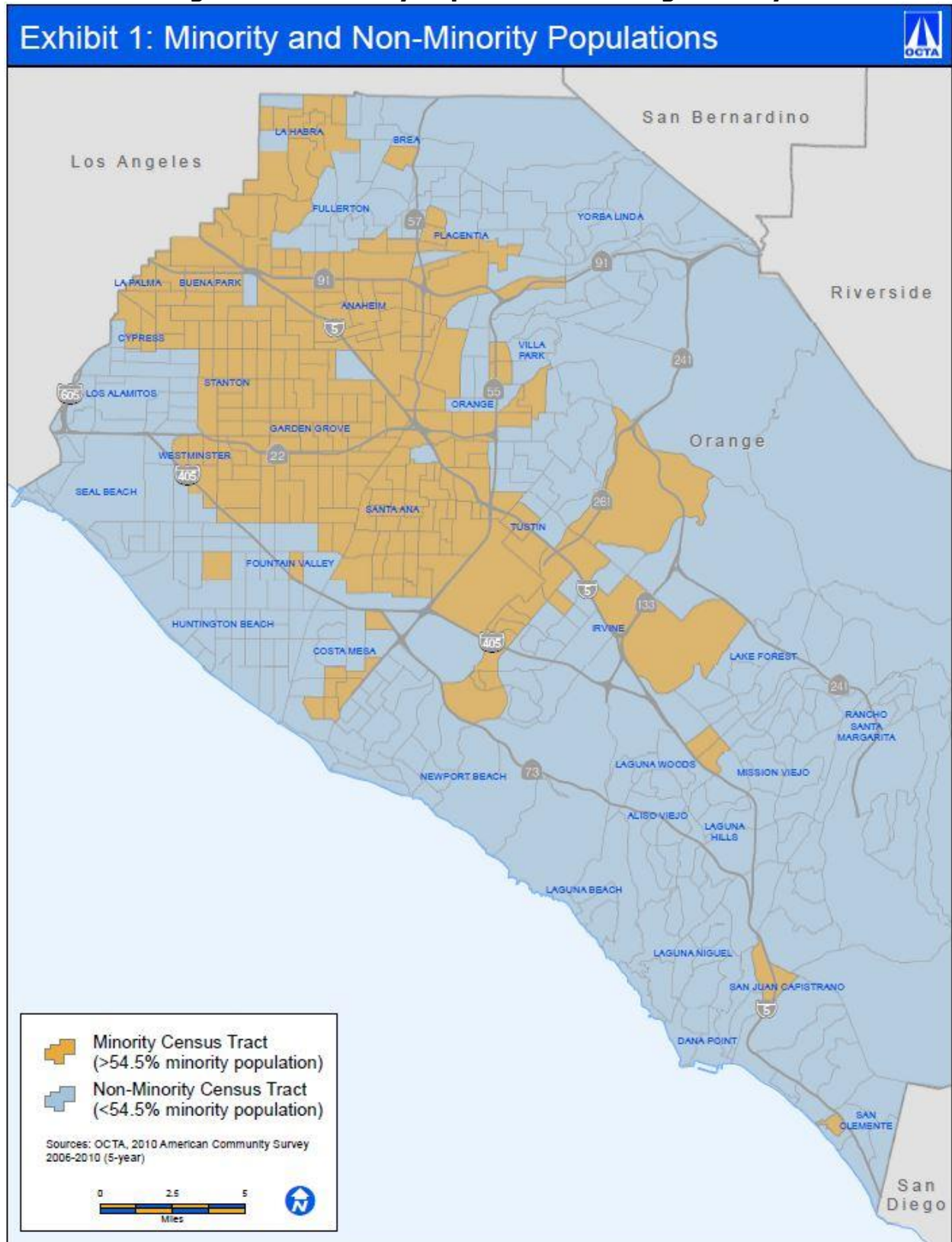
	Number	Percentage
Total Population	3,010,232	100%
White	1,328,499	44.1%
African American	50,744	1.7%
Asian	537,804	17.9%
Hispanic	1,012,973	33.7%
American Indian or Alaskan Native	18,132	0.6%
Native Hawaiian or Pacific Islander	9,354	0.3%
Two or More Races	52,726	1.7%
Total Minority Population	1,615,722	54.5%

Source: OCTA Title VI Report, 2012; US Census Bureau, 2010

According to 2010 US Census Bureau data, 10.2% of households in Orange County are low-income while 10.7% of residents are low-income. Figure 1-2 shows census tracts in Orange County that are low- income census tracts.

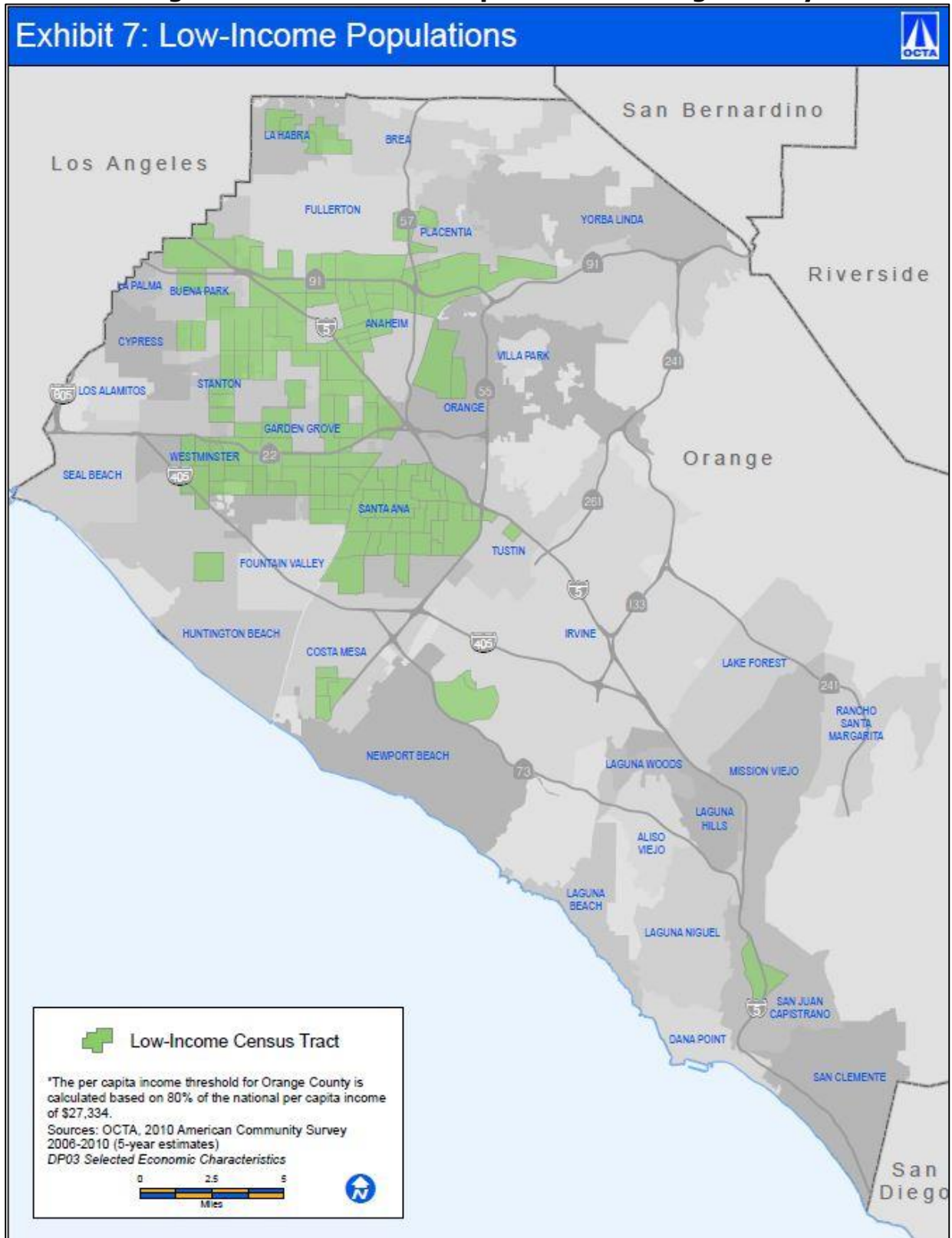
OCTA defines LEP residents as those who speak English less than “very well” or not at all. According to the US Census Bureau and OCTA’s 2012 LEP Plan, approximately 21.4% of Orange County’s population 5 years or older speak English less than “very well” or not at all. The two most common languages spoken by LEP residents of Orange County are Spanish and Vietnamese, spoken by 26.5% and 5.8% of the LEP population respectively.

Figure 1-1: Minority Populations in Orange County



Source: OCTA Title VI Report, 2012

Figure 1-2: Low Income Populations in Orange County



Source: OCTA Title VI Report, 2012

1.3.2. CITIES WITH A SITE ALTERNATIVE

As described in the Site Selection Report for TSOC (Draft completed June 13, 2014), a multi-phase analysis narrowed the potential TSOC sites to four locations. These four site alternatives are located in four different cities: Anaheim, Costa Mesa, Irvine, and Santa Ana. The cities of Anaheim, Irvine, and Santa Ana contain large minority populations while the city of Costa Mesa contains sizeable, but not majority, minority populations.

City of Anaheim – Site 15

The City of Anaheim is located in northwest Orange County and, with 336,265 residents according to the 2010 US Census, is the most populous city in the County. The racial/ethnic composition is 25.2% White, 2.4% African American, 14.6% Asian, 52.8% Hispanic, 0.2% American Indian or Alaskan Native, 0.4% Native Hawaiian or Pacific Islander, 1.8% Two or more races, and 0.2% Other races, making Anaheim's minority residents 72.2% of its total population.

City of Costa Mesa – Site 41

The City of Costa Mesa is located along the coast of Orange County and has a population of 109,960 according to the 2010 US Census. The racial/ethnic composition is 51.8% White, 1.2% African American, 7.7% Asian, 35.8% Hispanic, 0.2% American Indian or Alaskan Native, 0.4% Native Hawaiian or Pacific Islander, 2.5% Two or more races, and 0.2% Other races, making its minority residents 47.8% of its total population.

City of Irvine – Site 52

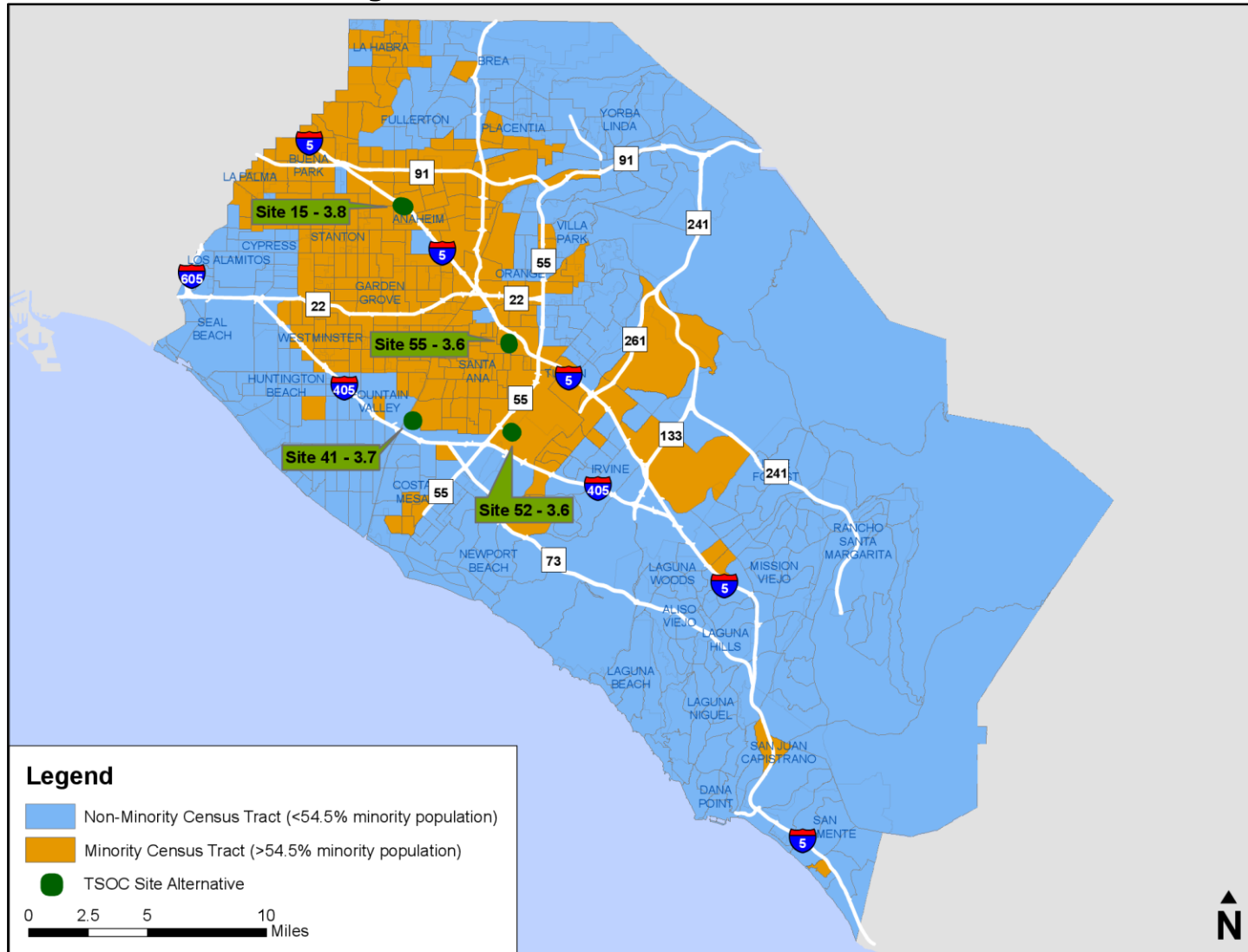
The City of Irvine is located in south Orange County and has a population of 212,375 according to the 2010 US Census. The racial/ethnic composition is 45.1% White, 1.6% African American, 39% Asian, 9.2% Hispanic, 0.1% American Indian or Alaskan Native, 0.1% Native Hawaiian or Pacific Islander, 4.6% Two or more races, and 0.3% Other races, making its minority residents 54.6% of its population.

City of Santa Ana – Site 55

The City of Santa Ana is located in north Orange County and has a population of 324,528 according to the 2010 US Census. The racial/ethnic composition is 9.2% White, 1% African American, 10.4% Asian, 78.2% Hispanic, 0.2% American Indian or Alaskan Native, 0.3% Native Hawaiian or Pacific Islander, 0.7% Two or more races, and 0.1% Other races, making its minority residents 92.6% of its population.

As can be seen in Figure 1-3, three out of the four alternatives carried forward for consideration (Anaheim, Irvine, and Santa Ana) are located in Title VI census tracts. This report further analyzes each alternative to determine if Title VI residents are likely to be disproportionately impacted by developing the TSOC at any one of these four sites.

Figure 1-3: Location of TSOC Site Alternatives



Source: US Census 2010; STV, 2015

2. TRANSPORTATION SECURITY & OPERATIONS CENTER SITE SELECTION PROCESS

2.1. METHODOLOGY FOR SITE SELECTION

As described in the Site Selection Report for TSOC, the analysis used a phased screening process to identify and then narrow the number of potential sites. The process consisted of three phases and was applied across Orange County:

- Phase 1: Area Requirements
- Phase 2: Site Requirements
- Phase 3: Comparative Scores

In Phase 1, absolute factors that would preclude the construction and operation of the TSOC were considered. For example, because this is a security and operations center that would need to be operational during natural disasters, it would be unacceptable to locate the TSOC in an area that is defined as 100-year floodplain. Thus, all such areas were eliminated from further consideration.

In Phase 2, the areas that were not eliminated in Phase 1 were analyzed on a more specific site level. This phase was used to screen out sites or properties that did not meet minimum and required qualities for the Project. For example, based on previous analyses, it has been determined that the TSOC requires a minimum of a two-acre site. If a site or combination of smaller sites was less than two acres, it was eliminated from further consideration.

In Phase 3, each of the remaining potential sites was scored (on a scale of 1-5) based on how well the site met specific criteria. These criteria included characteristics that could be measured on a scale or range. For example, convenient access to freeways is a desirable quality for the TSOC site. To capture the comparative subtleties between sites, potential sites were given a numerical score (rather than a Yes/No determination) based on the distance from the site to the nearest freeway ramp. The scores were then averaged and used to highlight a short list of potential sites.

Throughout the process, seven principal criteria were used to identify suitable sites for the TSOC:

- **Land Uses and Community Impacts** – Avoid impacts to low-income, minority, and residential neighborhoods
- **Site Location** – Proximity to OCTA's service area, line-of-sight to communication towers and freeway proximity
- **Natural Hazards** – Not within 100-year floodplain and not located on a Alquist-Priolo Earthquake Fault Zone
- **Ownership** – Preferred ownership by OCTA
- **Site Layout** – Minimum size and shape requirements
- **Development Costs** – Minimize property purchase cost if not owned by OCTA
- **Security** – Proximity to fire and police station and flexibility in building setback

2.2. INCORPORATING TITLE VI INTO SELECTION CRITERIA

As discussed in Section 2.1, among other criteria, impact on minority and low income populations was incorporated into the selection criteria used to select site alternatives. The scoring criteria were designed to minimize the extent and magnitude of impacts to communities.

The scoring criteria for land use impacts were as follows:

- 5 = Within an existing industrial area
- 4 = Within an existing commercial area
- 3 = Directly adjacent to residential properties
- 2 = Directly adjacent to sensitive receptors (schools, parks, historic landmarks, etc)
- 1 = Within or having the potential to adversely affect a Title VI or Environmental Justice Communities

The analysis used Geographic Information Systems (GIS) and parcel mapping to identify industrial, commercial, and residentially zoned areas. To locate sensitive receptors in close proximity to the proposed sites, the analysis relied on visual analysis of the areas surrounding potential sites using satellite images, site visits, and inventory lists of such sensitive sites. Finally, to ensure that the siting of the potential TSOC complied with current federal laws and regulations regarding Title VI and Executive Order 12898 (Environmental Justice), the site were analyzed against OCTA's 2012 Title VI Compliance Report to see if the sites fell within these neighborhoods.

2.2.1. SITES ADVANCED FOR CONSIDERATION

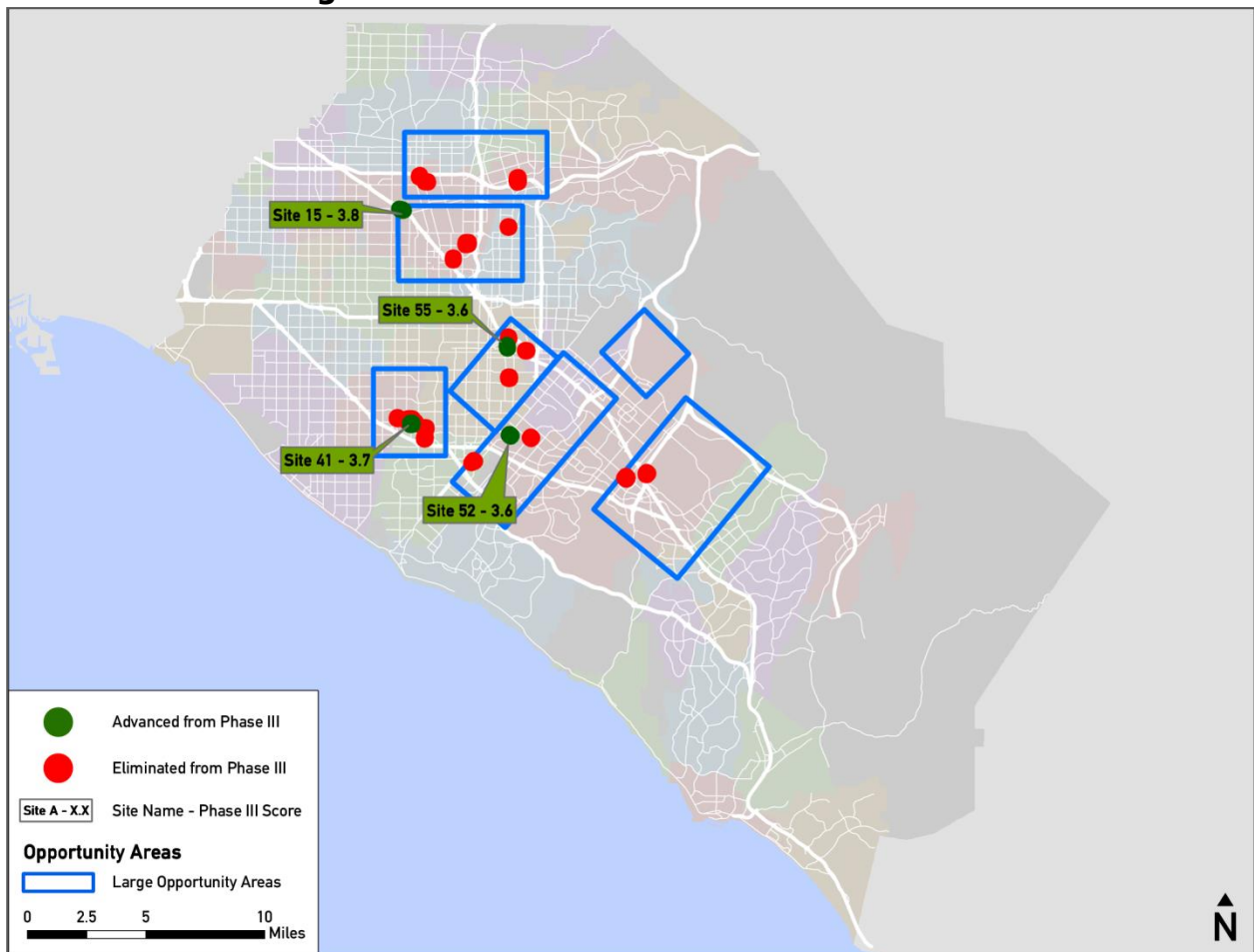
The four highest scoring potential sites are further described in the following section. Figure 3-1: shows the distribution of sites in Orange County. These sites are:

- Site 15 – Industrial (OCTA Anaheim Excess) in Anaheim
- Site 41 – Prototypical Private/Industrial Vacant Property in Costa Mesa
- Site 52 – Prototypical Private/Industrial Vacant Property in Irvine
- Site 55 – Prototypical Private/Industrial For Sale in Santa Ana

3. SITE EVALUATIONS

As stated in Section 2.2, Title VI population impacts were taken into consideration by including proximity to minority and low income communities in the criteria used to select alternatives to site the TSOC. Within the physical constraints of siting the facility, sites with limited or no impact on Title VI residents were advanced for further consideration. All four sites carried forward (as seen in Figure 3-1) received a rating of "5" in regards to land use impacts, meaning all sites are located on industrial land and not inside of a Title VI community. Development of the TSOC at any of these four sites would not require removal of residential units, resulting in no displacement of Title VI residents by this project. Site 52 and Site 41 are not located on or near blocks with Title VI residents. Site 15 and Site 55 are not located on a block with Title VI residents, but are adjacent to blocks with Title VI residents.

Figure 3-1: Sites Advanced from Phase III



Source: STV, 2015

3.1. CONSTRUCTION AND OPERATIONS ASSUMPTIONS

3.1.1. CONSTRUCTION

Although construction activities will necessitate bringing in equipment and workers by regular and heavy-duty vehicles, to the extent possible, construction staging and parking will be kept on site in order to minimize impacts to adjacent communities. All construction activity will be subject to and compliant with all municipal codes as they pertain to construction, for example, limiting potential air quality and noise nuisances associated with construction, such as work hour limits and buffering.

As no Title VI residents are immediately adjacent to any site alternative, the potential for construction-related nuisances posed to any Title VI communities is already limited. Roadway segments that access these sites do not provide immediate access to any Title VI residences.

3.1.2. OPERATIONS

According to the Facility Needs Assessment for the project, the TSOC is to house and facilitate the following operations:

- Central Communications (dispatchers)
- Emergency Operations Center
- Transit Police Services (Sheriff)
- Field Operations
- Server/Data Center

The TSOC will act primarily as office space for OCTA security operations and staff. According to the Facility Needs Assessment, TSOC will support up to 12 transit police and 25 field operations staff, though initial staffing is to be less (6 sheriffs and 18 field operations staff). Transit police and field operations staff will be based out of the TSOC and generating activity external to the site, but will spend most of the time supporting transit operations throughout OCTA's service area rather than coming and going from the site multiple times in a day or other localized activity.

While field operations staff and transit police based out of the TSOC will make trips out of the site over the course of the day as part of regular operations, the amount of staff that makes trips is relatively little compared to the traffic already existing on the major arterials and freeways in the near proximity each site.

3.2. SITE ANALYSIS

3.2.1. SITE 15 – ANAHEIM

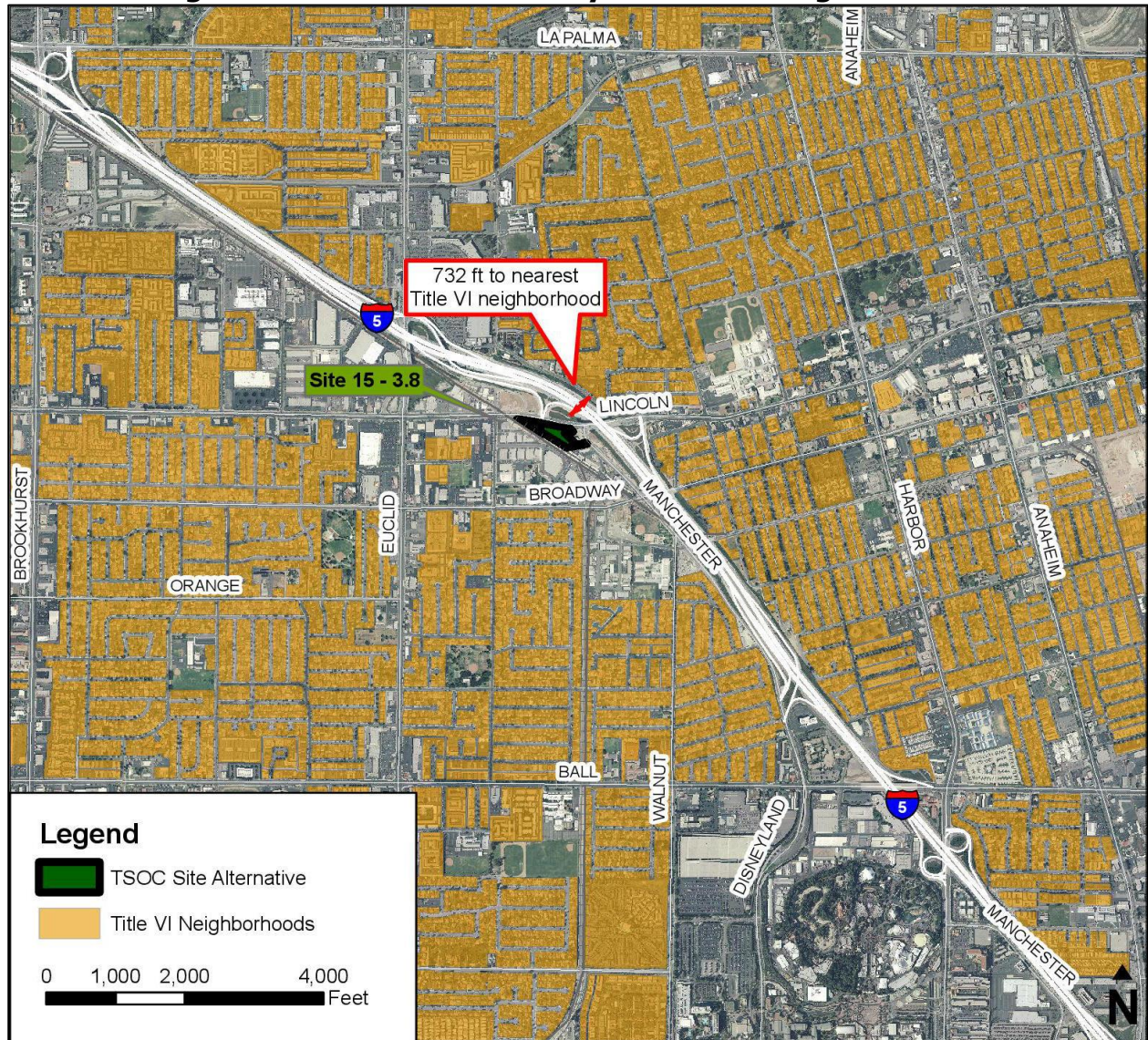
Site 15, located in Anaheim, is in proximity of blocks with Title VI residents. However, the closest residence to the site is to the north of Interstate 5 while the site is to the south of the freeway, 732 feet from property line to property line. The nearest block to Site 15 with Title VI residents not separated by a freeway is 1,033 feet from property line to property line. The site has existing auto repair businesses which would need to be relocated. As the site is physically separated from residents by other high-activity uses, including a freeway on one side and a railroad on the other, the effect on Title VI residents the TSOC would have at this site is cumulatively negligible. The location of the site and its proximity to Title VI residents is shown in Figure 3-2 and Figure 3-3.

Figure 3-2: Site 15 – Anaheim – Overview



Source: STV, 2014

Figure 3-3: Site 15 - Proximity to Title VI Neighborhoods



Source: STV, 2015

Because Site 15 received the overall highest score when factoring in all other evaluation criteria, it is OCTA's preferred site for the proposed TSOC. While it is not the alternative furthest from Title VI neighborhoods, Site 15 is not adjacent or directly accessible to any nearby residences. The nearest residential community is across I-5 on Lincoln Avenue, and can only be accessed through side streets off of Lincoln Avenue. The freeway and distance poses a barrier to any regular interaction between these communities and TSOC operations, particularly as the TSOC supports transit operations and transit operations do not occur on these particular residential streets.

3.2.2. SITE 41 – COSTA MESA

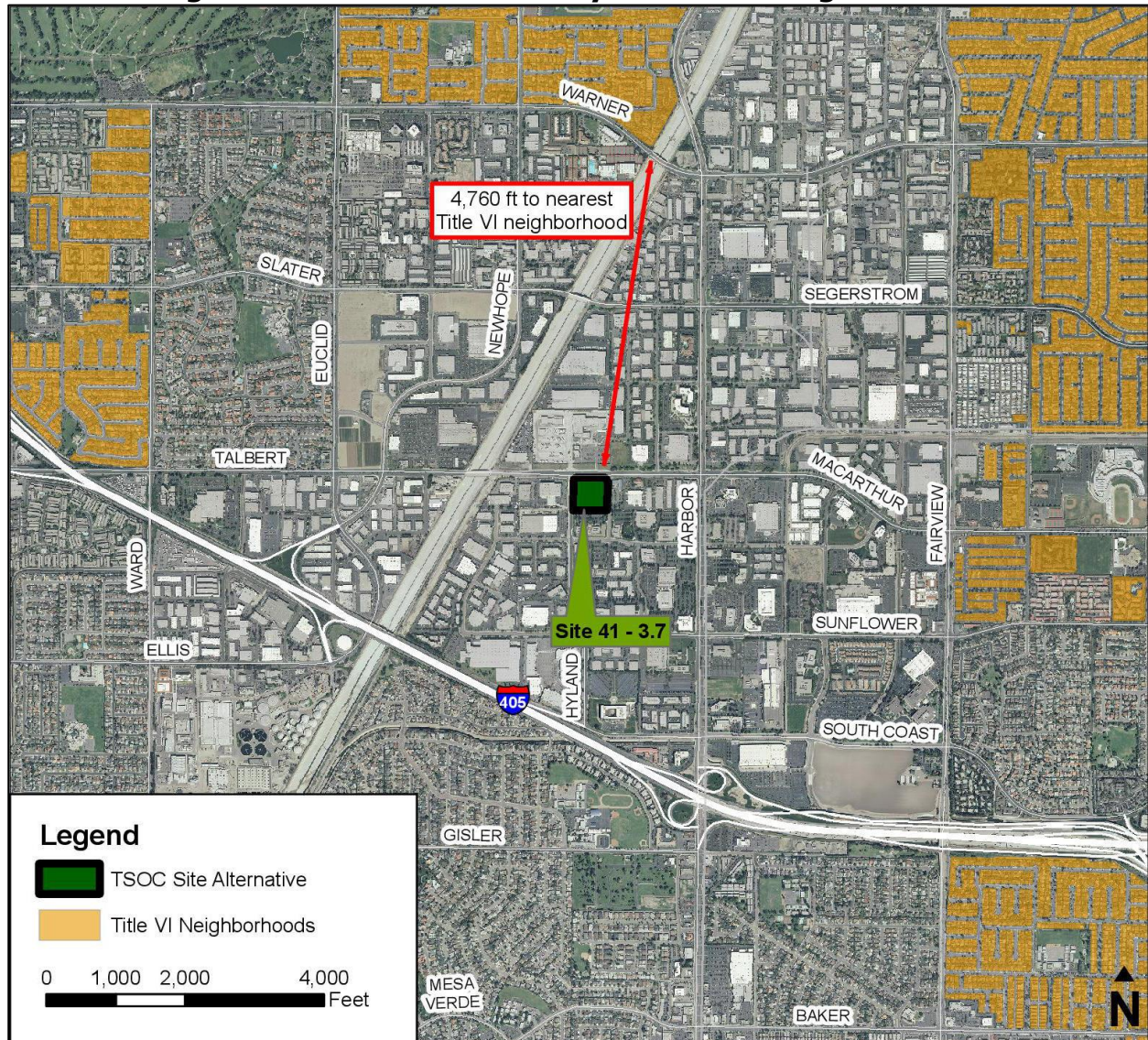
Site 41, located in Costa Mesa, is not in the immediate proximity of a Title VI population and is across the street from the existing Santa Ana Maintenance Facility. The nearest block with Title VI residents is 4,760 feet, nearly a mile away, from property line to property line. The location of the site and its proximity to Title VI residents is shown in Figure 3-4 and Figure 3-5.

Figure 3-4: Site 41 - Costa Mesa – Overview



Source: STV, 2014

Figure 3-5: Site 41 - Proximity to Title VI Neighborhoods



Source: STV, 2015

As this site is not in a Title VI census tract and nearly a mile away from the nearest Title VI neighborhood with three major arterials between these locations, development of the TSOC at Site 41 would have no effect on Title VI residents.

3.2.3. SITE 52 – IRVINE

Site 52, located in Irvine, is not in the immediate proximity of a Title VI population. The nearest block with Title VI residents is 4,393 feet, more than three-quarters of a mile away, from property line to property line. The location of the site and its proximity to Title VI residents is shown in Figure 3-6 and Figure 3-7.

Figure 3-6: Site 52 – Irvine – Overview



Source: STV, 2014

Figure 3-7: Site 52 - Proximity to Title VI Neighborhoods



Source: STV, 2014

While Site 52 is in a Title VI census tract, it is nearly a mile from the nearest Title VI neighborhood, on the other side of a major freeway (as seen in Figure 3-7). This makes it unlikely that the development of the TSOC at this site would have an effect on Title VI residents.

3.2.4. SITE 55 – SANTA ANA

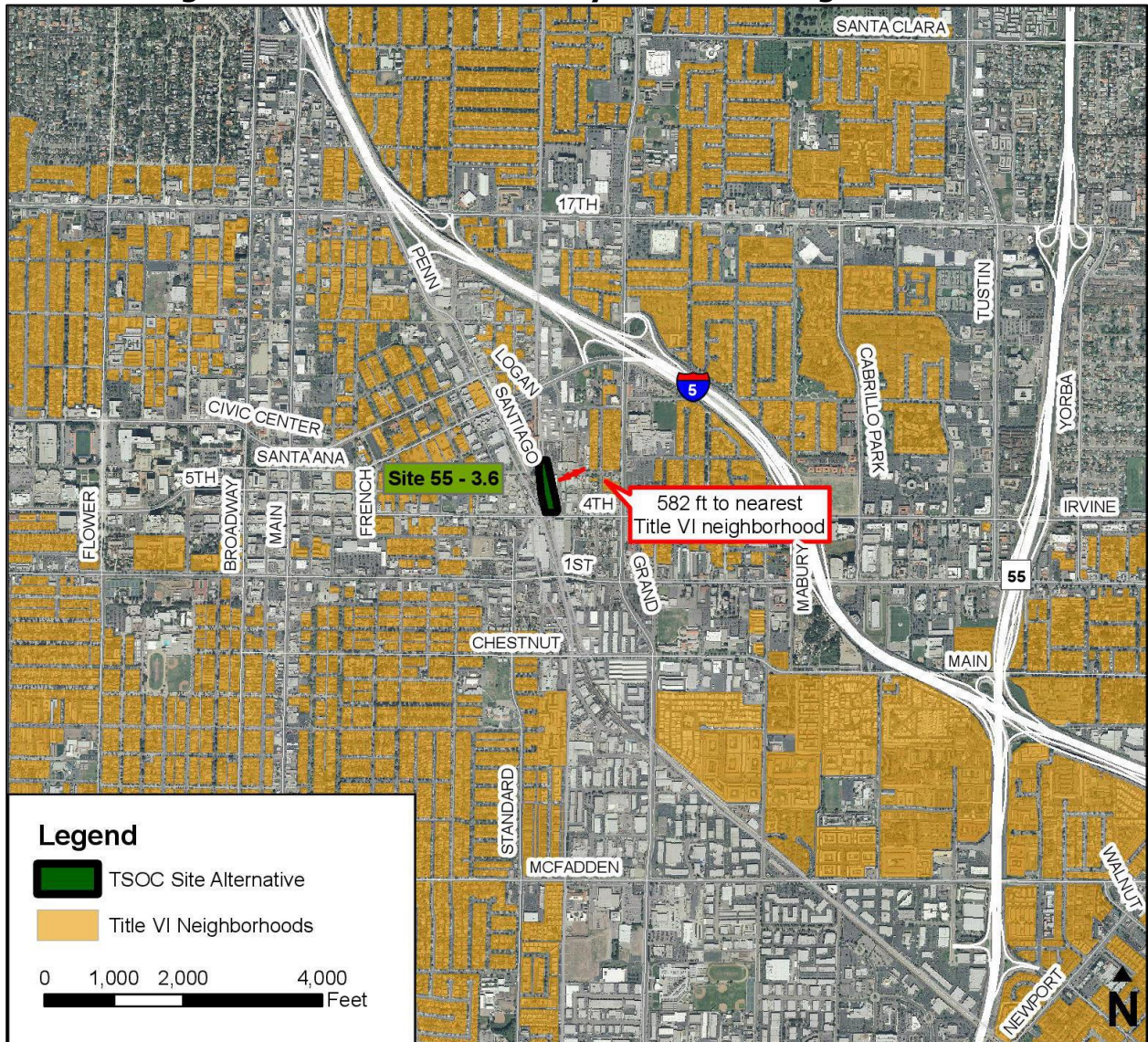
Site 55, located in Santa Ana, is not on a block with Title VI residents, but is in proximity of blocks that have Title VI residents. The nearest block with a Title VI population is 582 feet from property line to property line. This site is adjacent to other transit operations uses (railroad). The location of the site and its proximity to Title VI residents is shown in Figure 3-8 and Figure 3-9.

Figure 3-8: Site 55 - Santa Ana – Overview



Source: STV, 2014

Figure 3-9: Site 55 – Proximity to Title VI Neighborhoods



Source: STV, 2015

Site 55 is closer to Title VI residents than the other sites, with less of a physical or distance buffer relative to the other alternatives. However, it is separated from Title VI residents by railroad tracks on one side and industrial land on the other. The activity generated from the TSOC that can be considered a nuisance is minimal relative to surrounding uses.

3.2.5. POTENTIAL IMPACTS OF ALTERNATIVES ON TITLE VI RESIDENTS

As stated in Section 3, all site alternatives considered are owned by OCTA or are unutilized industrial land. The development of the proposed TSOC facility poses no risk to displacing Title VI residents as there are none immediately adjacent to the site or adjacent to land into which the TSOC might reasonably expect to expand. Table 3-1 compares all four sites and summarizes their potential to impact Title VI residents.

Table 3-1: Impact Comparison for Potential Sites

Measure	Site 15	Site 41	Site 52	Site 55
Minority population on or adjacent to Census Block Group	No	No	No	Yes
Site existing condition	Anaheim Excess – OCTA owned	Private Industrial – Vacant	Private Industrial – Vacant	Private Industrial – for sale
Would this site selection cause displacement?	No (currently OCTA owned)	No (currently vacant)	No (currently vacant)	No (currently for sale)
Similar facilities nearby (maintenance, operations, dispatch, etc.)	None	Santa Ana Maintenance Facility	None	None
Distance from nearest Title VI neighborhood	732 feet	4,760 feet	4,393 feet	582 feet

As the TSOC is a transit operations facility, not a transit service, LEP populations are not at risk to be disproportionately impacted by the TSOC’s operation as there is no anticipated regular interaction between the facility and LEP residents. Due to communication barriers, LEP population could potentially be disproportionately impacted by the TSOC during public outreach related to the siting and development of the proposed TSOC. However, OCTA has a public outreach plan to engage LEP and other Title VI residents and mitigate or remove these potential impacts. This plan is discussed in more detail in Section 4.

4. PUBLIC OUTREACH

OCTA's Public Involvement Plan (PIP) establishes procedures that allow for, encourage, and monitor participation of all citizens in the OCTA service area. The development of the plan took into consideration the steps required to engage traditionally underserved segments of the population, which includes minority, low-income, and limited English language proficiency residents. Stakeholder engagement includes individuals and groups, private, non-profit, and public, particularly groups that have access to traditionally underserved communities. In addition to real time translation services provided by interpreters at OCTA community meetings, translation of printed and published materials, as well as presentations and informational materials at OCTA community meetings are also translated should they be needed by community members with limited English language proficiency.

The PIP's objectives are:

- To determine what non-English languages and other cultural barriers may exist to public participation within the Orange County area;
- To provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area;
- To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including by not limited to, low-income and minority members of the public;
- To provide avenues for two-way flow of information and input from populations which are typically not likely to attend such meetings;
- To provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program;
- To use various illustrative visualizations techniques to convey the information, including, but not limited to, charts, graphs, photos, maps, and the OCTA website.

OCTA will use their board meetings to seek community participation regarding the final site selection for the TSOC, particularly from Title VI populations. Board meetings occur monthly at OCTA Headquarters in the City of Orange. Headquarters are accessible by four different OCTA bus lines and Metrolink train.

5. CONCLUSION

This Title VI Equity Analysis aids OCTA in selecting a TSOC site that does not disproportionately impact minority or LEP populations. The analysis finds that only one of the four sites selected for consideration in the site selection report has a minority population on the census block adjacent to it. The remaining three are not in the proximity of a minority population. None of the four sites being considered would result in minority population displacement if selected for development.

The next steps in the TSOC site selection are:

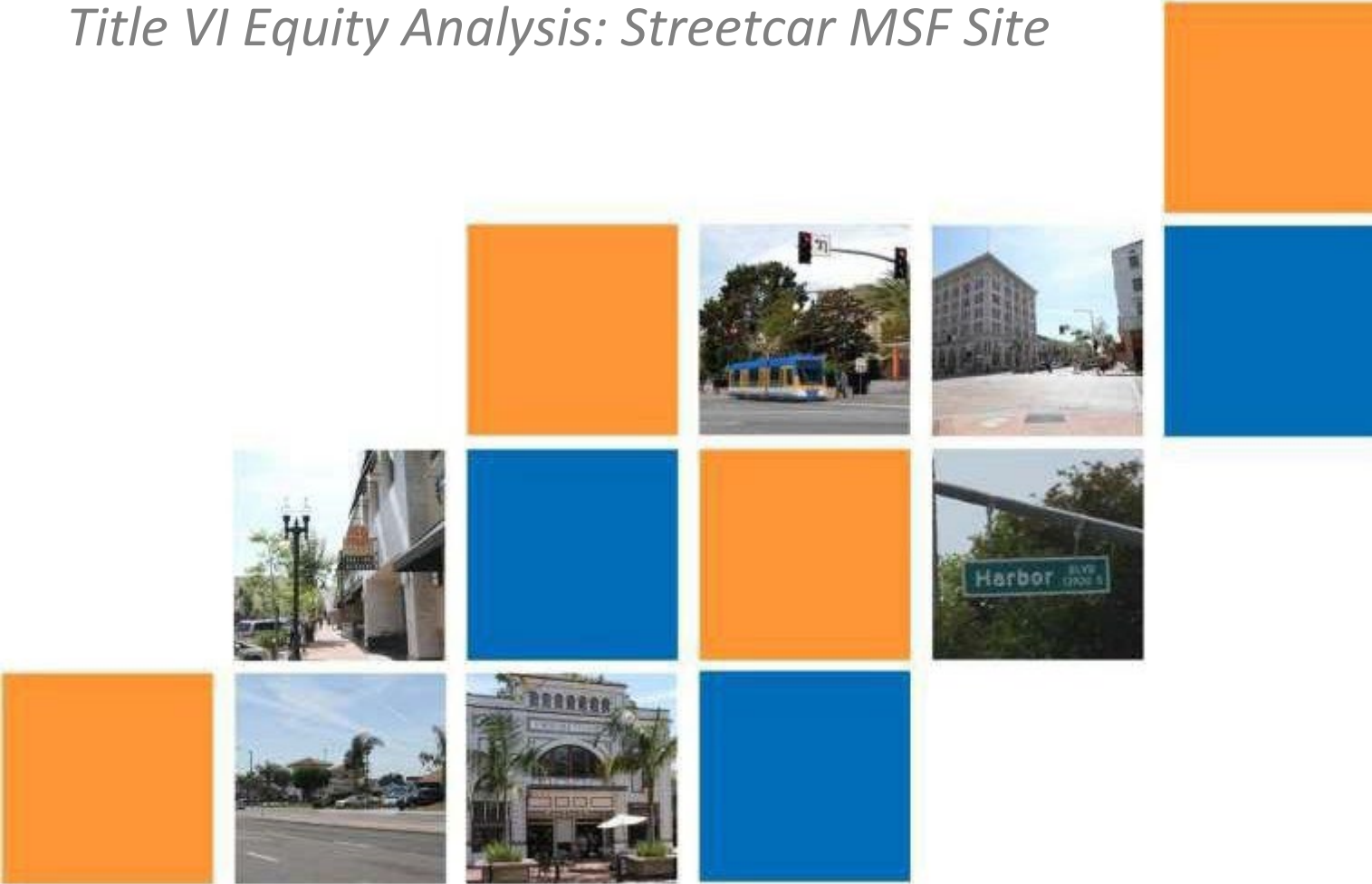
- Outreach based on the PIP that meets the requirements of Title VI.
- Documenting feedback from the nearby community and incorporating it into the site selection and Title VI Equity Analysis.
- Presenting the results of the entire site selection process, including Title VI Equity Analysis, to the OCTA Board.

After these steps are complete, a final site selection for the TSOC will be made.

OCTA
OC Streetcar Maintenance & Storage Facility
Title VI Equity Analysis

OC STREETCAR PROJECT

Title VI Equity Analysis: Streetcar MSF Site



Submitted By

Orange County Transportation Authority

July 10, 2024

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1.0 INTRODUCTION

The OC Streetcar is a 4.15-mile modern streetcar line that will serve Santa Ana's historic downtown and surrounding areas. The project emerged as the preferred alternative from the Santa Ana-Garden Grove (SA-GG) Fixed Guideway Corridor project. To support operation of the streetcar, a Maintenance and Storage Facility (MSF) will be required. Several candidate MSF sites were identified during the planning process, with the two leading sites advanced and evaluated in the Environmental Assessment/Draft Environmental Impact Report (EA/DEIR). The EA/DEIR was prepared by the City of Santa Ana (in cooperation with the City of Garden Grove), who was the project's lead agency prior to the Orange County Transportation Authority (OCTA).

This report analyzes and documents the site selection process for the MSF and verifies that the preferred site for the facility was not determined based on race, color, or national origin per requirements established in Title VI of the Civil Rights Act of 1964.

2.0 TITLE VI COMPLIANCE

Title VI, 42 U.S.C. § 2000d et seq, was enacted as part of the Civil Rights Act of 1964. It prohibits discrimination based on race, color, or national origin in programs and activities receiving federal financial assistance. Compliance with Title VI of the Civil Rights Act of 1964 is a federal mandate for all public service agencies. Title VI applies to all aspects of the services provided by OCTA, which must be provided regardless of race, color, or national origin.

2.1 OCTA's Title VI Policy

OCTA operates all of its services, programs, and activities without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. OCTA is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color, or national origin as protected by Title VI. OCTA's Title VI policy and complaint process is detailed on the [agency website](#).

2.2 Title VI Requirements for Determining a Site or Facility

In addition to Title VI, Title 49 Code of Federal Regulations (CFR) Section 21.5(b)(3) asserts, "in determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Finally, Title 49 CFR Part 21, Appendix C, Section 3(iv) provides that, "the location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color or national origin."

OCTA

Title VI Equity Analysis: Streetcar MSF Site

Per Title 49 CFR Section 21.9(b)(3), OCTA must conduct a Title VI equity analysis to demonstrate that the MSF site is selected without regard to race, color, or national origin. Per the guidance in FTA Circular C 4702.1B, the equity analysis must:

- Include outreach to persons potentially impacted by the siting of the facility;
- Compare impacts of various siting alternatives;
- Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area; and
- Occur before the selection of the preferred site.

3.0 SITE SELECTION PROCESS

This section describes the process used to identify potential sites for the MSF, which was detailed in the Santa Ana and Garden Grove Fixed Guideway Corridor Project: Operations and Maintenance Facility Site Review (January 2011). Details on the process including the site characteristics, evaluation criteria, and sites included in the Title VI evaluation are described in the following sections.

3.1 Site Selection Background and Approach

The MSF will function as the storage and maintenance site of the streetcar vehicles. The site will need to accommodate a structure that supports both the maintenance and administrative functions of streetcar operations, provide employee parking, and provide for various functions such as outside storage of system components, vehicle washing, and local requirements for landscaping and screening. The number of streetcar vehicles required for operations is the primary factor driving the site size requirements.

The site selection process was guided by a series of general characteristics required to ensure that the facility could be cost efficient from both a capital and operations perspective. The key characteristics used to identify can screen potential sites are summarized in Table 1.

Table 1. Key Site Characteristics

Criteria	Description
Directly adjacent to or within close proximity to the streetcar alignment	Candidate MSF sites must be adjacent or in close proximity to the streetcar alignment to maximize operational flexibility and limit the additional costs associated with transporting vehicles excessive lengths from the facility to the revenue service tracks.
Large enough to accommodate the programmed O&M functions	Candidate sites should be large enough to accommodate the initial fleet size (6-8) and potential future expansion fleet (12-14). Based on a review of industry standards, the target site size is approximately 2 to 3 acres.

Criteria	Description
Flat and rectangularly shaped	Candidate sites should ideally have no grade issues to avoid additional costs associated with site grading. Rectangular sites generally allow the most efficient facility layouts.
Complementary adjacent land uses and favorable zoning	Candidate sites should have complementary land uses and zoning.
Favorable ownership situation	Candidate sites should preferably have a favorable ownership situation to simplify the acquisition process. Preference is given to sites that are publicly owned or have singular or few owners. Sites that are vacant or do not require business or residential relocations are also preferred.
Offers opportunity to enhance location	Candidate sites should provide opportunity to enhance the surrounding area.

Source: Santa Ana and Garden Grove Fixed Guideway Corridor Project: Operations and Maintenance Facility Site Review, January 2011

3.2 Identification of Candidate Sites

With the key site characteristics in mind, a review of the streetcar study area was conducted to identify candidate MSF sites. Much of the study area is characterized by predominantly single- and multi-family land uses, which are not considered compatible with an MSF site. Additionally, the downtown area offers few opportunities without the displacement of existing businesses. As such, the areas that were determined to present the most opportunities were in the vicinity of the terminus stations and the area adjacent to the Pacific Electric Right of Way (PE ROW) between Raitt Street and the Santa Ana River.

Four candidate sites were identified for consideration for the streetcar MSF. These include:

- A portion of the area located south of the Santa Ana Regional Transportation Center (SARTC) and bordered by 4th Street, 6th Street, Poinsettia Street, and the Metrolink tracks.
- The former OCTA Downtown Santa Ana Transit Terminal at Santa Ana Boulevard and Ross Street in downtown Santa Ana.
- A portion of the area located west of Raitt Street between the PE ROW and 5th Street.
- A vacant parcel located within the southeast quadrant of the intersection of Harbor Boulevard and Westminster Avenue.

3.3 Preliminary Site Evaluation Process

A preliminary screening of the candidate sites was conducted using the key site characteristics outlined in Section 3.1. Based on this screening, two sites were eliminated from further consideration. These include:

- **Former OCTA Downtown Santa Ana Transit Terminal** – this site did not meet the size requirements and the layout of the existing structure would not accommodate the track layout needed for the anticipated fleet size.
- **SE quadrant of the Harbor Boulevard and Westminster Avenue intersection** – this site is considered a valuable component of future Transit Oriented Development (TOD) opportunities at the confluence of the streetcar alignment and two BRT lines.

The remaining two sites were advanced and further evaluated in the *Santa Ana and Garden Grove Fixed Guideway Corridor Environmental Assessment/Draft Environmental Impact Report*.

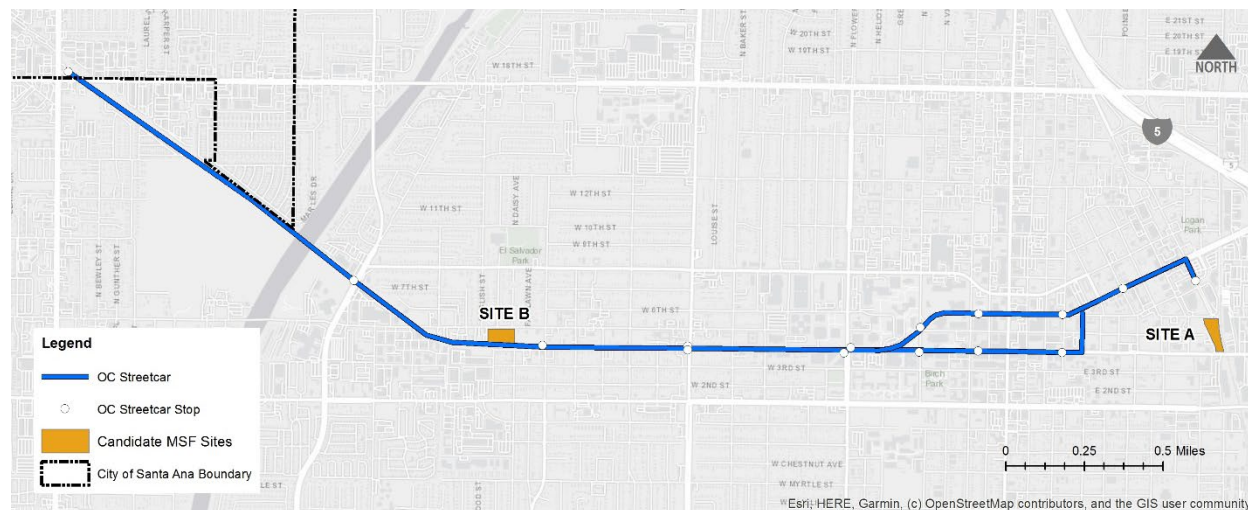
3.4 Sites Included in Title VI Evaluation

There are two candidate sites for the MSF included in this Title VI equity analysis, which include:

- **Site A** – south of SARTC and bordered by 4th Street, 6th Street, Poinsettia Street, and the Metrolink tracks.
- **Site B** – west of Raitt Street between the PE ROW and 5th Street

The candidate sites included in the Title VI evaluation are illustrated in Figure 1.

Figure 1. Candidate Sites Included in Title VI Evaluation



4.0 BENEFITS AND BURDENS ANALYSIS

A review of the benefits and burdens associated with each site was conducted to identify potential impacts that may be adverse to the community. This assessment confirmed that both sites have a combination of positive (benefit) and negative (burden) features. Examples of

benefits include site size, land use compatibility, and proximity to the streetcar alignment. Examples of burdens include residential and/or business displacements and physical constraints. The benefits and burdens associated with each site are documented in Table 2.

In addition to the comparison of benefits and burdens, the sites are further evaluated in Section 5.0 to determine if any of the identified burdens would result in equity impacts that cannot be mitigated and whether the site selection would result in disparate treatment on the basis of race, color, or national origin.

Table 2. Candidate MSF Sites – Benefits and Burdens Evaluation

Site	Benefits / Positive Features	Burdens / Negative Features
Site A	<ul style="list-style-type: none"> • Compatible land uses; located in an area of industrial and commercial uses. Currently used as a waste transfer and recycling center. • Comprised of two parcels under single ownership. 	<ul style="list-style-type: none"> • Small and irregularly shaped parcel limits operational flexibility and expansion potential. • Would require non-revenue track extension on Santiago Ave for the length of approximately two city blocks. • Would require displacement of one business.
Site B	<ul style="list-style-type: none"> • Size could accommodate full range of O&M functions and future system expansion into Garden Grove or Anaheim. • Located in an area of industrial and commercial uses. While there are residential uses to the north and south, the proposed use of the site would be more compatible than the existing waste transfer facility because it would operate with lower intensity industrial usage. • Connects to the streetcar alignment via the PE ROW. 	<ul style="list-style-type: none"> • Comprised of three parcels under two separate owners. • Would require displacement of one business and six multi-family housing structures. However, further review indicated housing units were red tagged by the city, suggesting they are not safe for occupancy.

Sources: *Santa Ana and Garden Grove Fixed Guideway Corridor Project: Operations and Maintenance Facility Site Review*, January 2011; *Environmental Assessment/Draft Environmental Impact Report*, May 2014.

5.0 EQUITY ANALYSIS AND CUMULATIVE IMPACTS

This section provides a comparison of the demographic characteristics of the potential MSF sites for the OC Streetcar. The purpose of this analysis is to ensure that the location of the MSF does not displace residences or businesses on the basis of race, color, or national origin, nor result in cumulative adverse impacts due to the presence of other facilities with similar impacts in the area.

5.1 Equity Demographic Analysis

An analysis of demographic characteristics for the streetcar MSF sites was completed using American Community Survey (ACS) 2006-2010 5-year estimates. Minority and low-income populations were analyzed for all census block groups that fell within a half-mile of the proposed MSF sites and compared to the City of Santa Ana as a whole. The results of this analysis are detailed in the following sections.

5.1.1 Minority Population

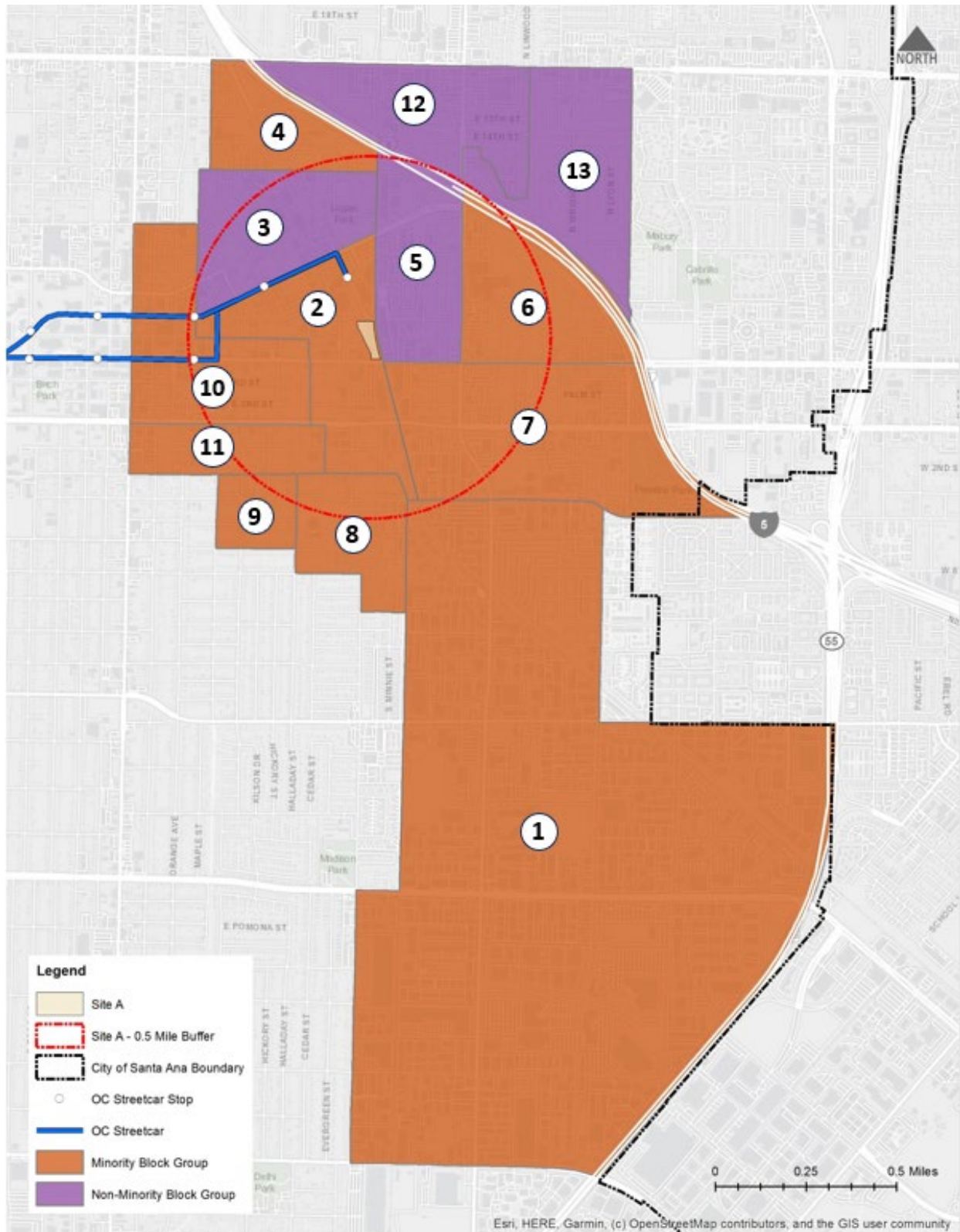
Minority population data was derived from Census Table B03002. For the purposes of this analysis, minority population was defined as the total population minus the non-Hispanic, white-only population. As summarized in Table 3 and illustrated in Figure 2, a majority of the block groups that fall with a half-mile of Site A have a high higher share of minority populations than the City of Santa Ana (9 out of 13 block groups, or 69.2 percent). Taken as a whole, minority populations account for 91.9 percent of the total population of block groups within a half-mile of Site A, compared to 90.4 percent for the city.

Table 3. Site A – Minority Population (2010)

Map ID	Geography	Total Population	Minority Population		Minority Block Group
		Number	Number	Percent	
-	Site A	26,757	24,597	91.9%	-
1	CT 744.03, BG 1	2,886	2,628	91.1%	Yes
2	CT 744.05, BG 1	1,653	1,620	98.0%	Yes
3	CT 744.05, BG 2	2,454	2,136	87.0%	No
4	CT 744.05, BG 3	1,965	1,853	94.3%	Yes
5	CT 744.06, BG 1	1,225	847	69.1%	No
6	CT 744.06, BG 2	1,505	1,401	93.1%	Yes
7	CT 744.06, BG 3	1,264	1,250	98.9%	Yes
8	CT 745.01, BG 1	2,472	2,332	94.3%	Yes
9	CT 746.02, BG 2	2,552	2,552	100.0%	Yes
10	CT 750.02, BG 2	2,475	2,336	94.4%	Yes
11	CT 750.02, BG 3	2,880	2,842	98.7%	Yes
12	CT 754.03, BG 2	1,706	1,511	88.6%	No
13	CT 754.03, BG 4	1,720	1,289	74.9%	No
-	Santa Ana	325,216	293,907	90.4%	-
-	Orange County	2,965,525	1,615,722	54.5%	-

Source: 2010 ACS 5-Year Estimates, Table B03002

Figure 2. Site A – Minority Population (2010)



Source: 2010 ACS 5-Year Estimates, Table B03002

OCTA*Title VI Equity Analysis: Streetcar MSF Site*

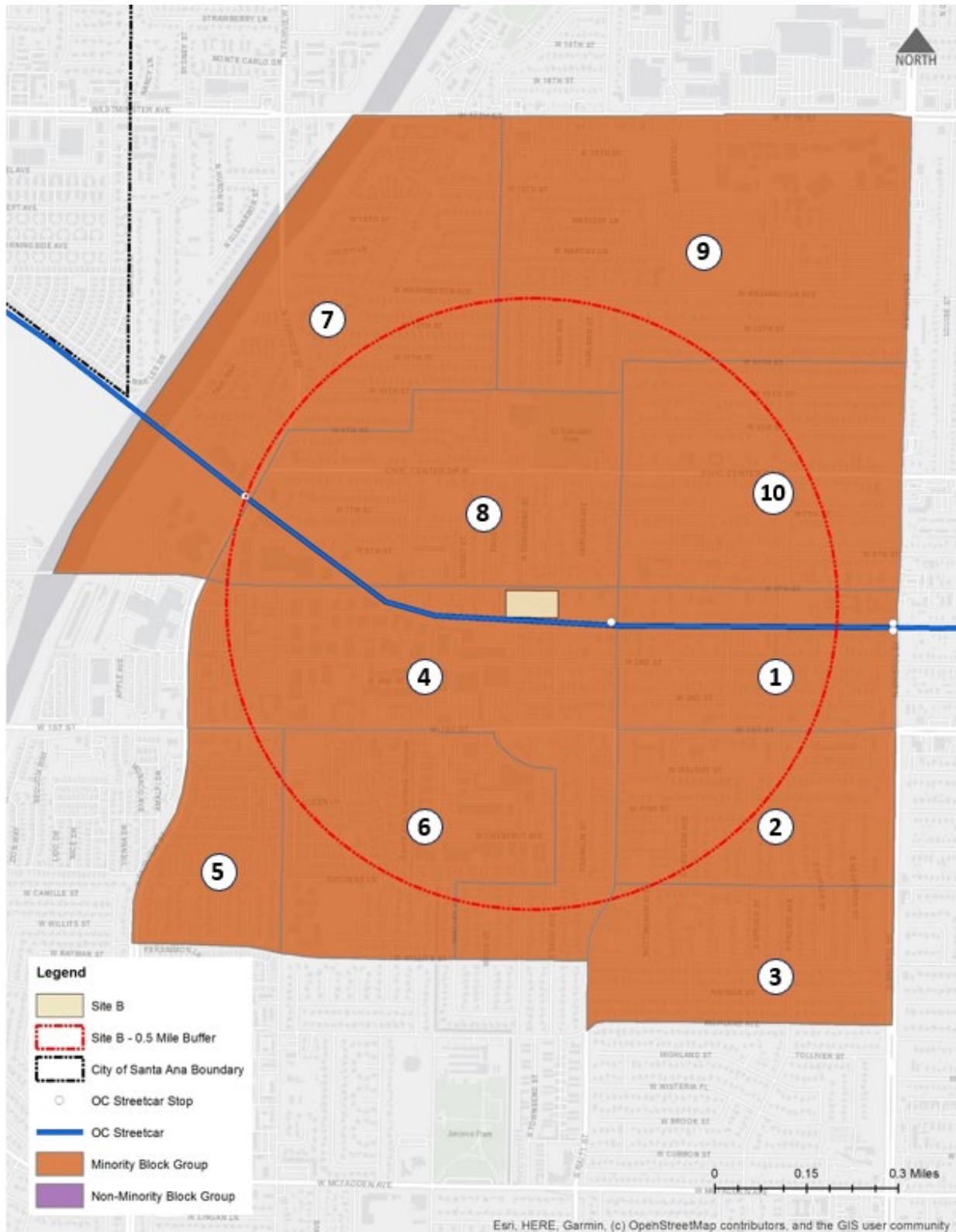
Minority populations are similarly prominent in the vicinity of Site B. As summarized in Table 4 and illustrated in Figure 3, all of the block groups that fall within a half-mile of Site B have a higher share of minority populations than the City of Santa Ana (10 out of 10 block groups, or 100 percent). Taken as a whole, minority populations account for 98.3 percent of the total population of block groups within a half-mile of Site B, compared to 90.4 percent for the city.

Table 4. Site B – Minority Population (2010)

Map ID	Geography	Total Population	Minority Population		Minority Block Group
		Number	Number	Percent	
-	Site B	24,013	23,598	98.3%	-
1	CT 748.01, BG 1	1,676	1,672	99.8%	Yes
2	CT 748.01, BG 2	2,335	2,279	97.6%	Yes
3	CT 748.01, BG 3	2,475	2,396	96.8%	Yes
4	CT 748.02, BG 1	2,132	2,123	99.6%	Yes
5	CT 748.02, BG 2	2,117	2,066	97.6%	Yes
6	CT 748.02, BG 3	1,973	1,916	97.1%	Yes
7	CT 752.01, BG 1	3,385	3,323	98.2%	Yes
8	CT 752.01, BG 2	2,404	2,404	100.0%	Yes
9	CT 752.02, BG 1	2,173	2,093	96.3%	Yes
10	CT 752.02, BG 2	3,343	3,326	99.5%	Yes
-	Santa Ana	325,216	293,907	90.4%	-
-	Orange County	2,965,525	1,615,722	54.5%	-

Source: 2010 ACS 5-Year Estimates, Table B03002

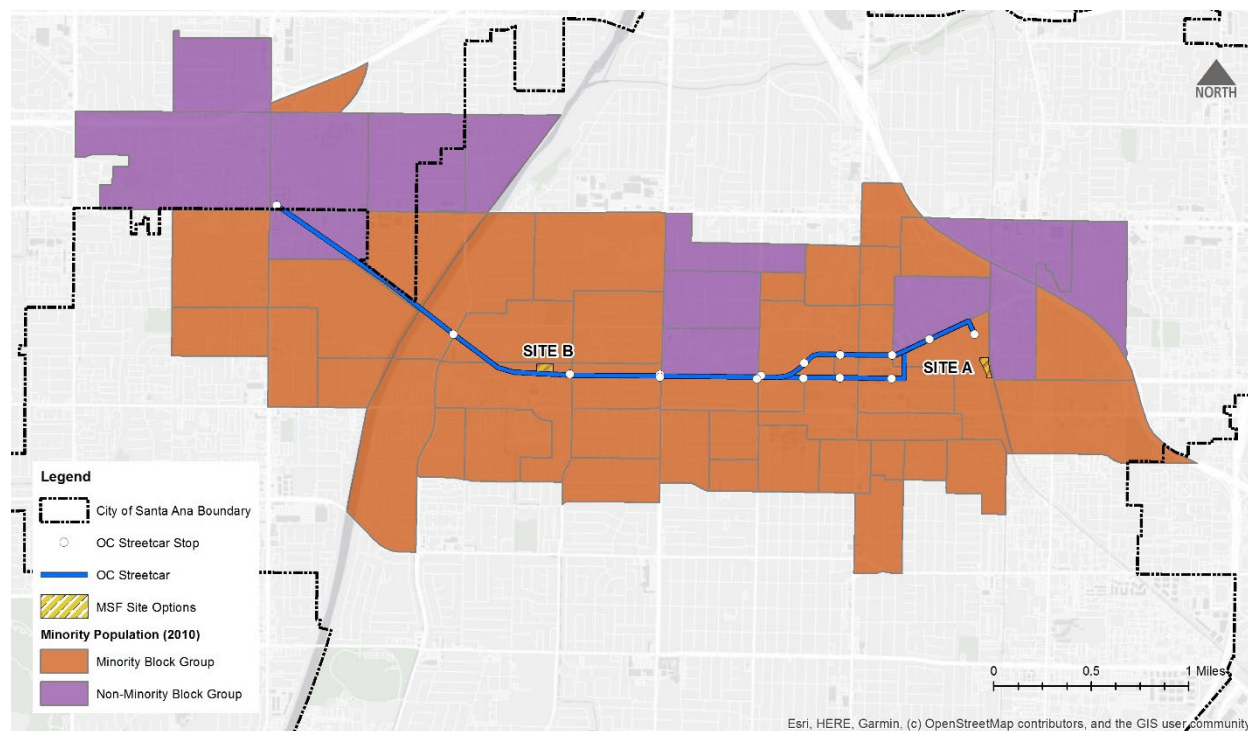
Figure 3. Site B – Minority Population (2010)



Source: 2010 ACS 5-Year Estimates, Table B03002

For additional context, a review of minority populations was also conducted for the entire streetcar corridor. As illustrated in Figure 4, a majority of the block groups within a half-mile of the streetcar alignment have a higher percentage of minority populations than the City of Santa Ana (43 out of 54 block groups, or 80 percent).

Figure 4. Streetcar Corridor – Minority Populations (2010)



Source: 2010 ACS 5-Year Estimates, Table B03002

5.1.2 Low-Income Population

Low-income population data was derived from Census Table B17021. For the purposes of this analysis, low income was defined as the population at or below 100 percent of the poverty level as determined by the U.S. Department of Health and Human Services. As summarized in Table 5 and illustrated in Figure 5, a majority of the block groups that fall within a half-mile of Site A have a higher share of low income populations than the City of Santa Ana (9 out of 13 block groups, or 69.2 percent). Taken as a whole, low-income populations account for 26.3 percent of the total population of block groups within a half-mile of Site A, compared to 17.9 percent for the city.

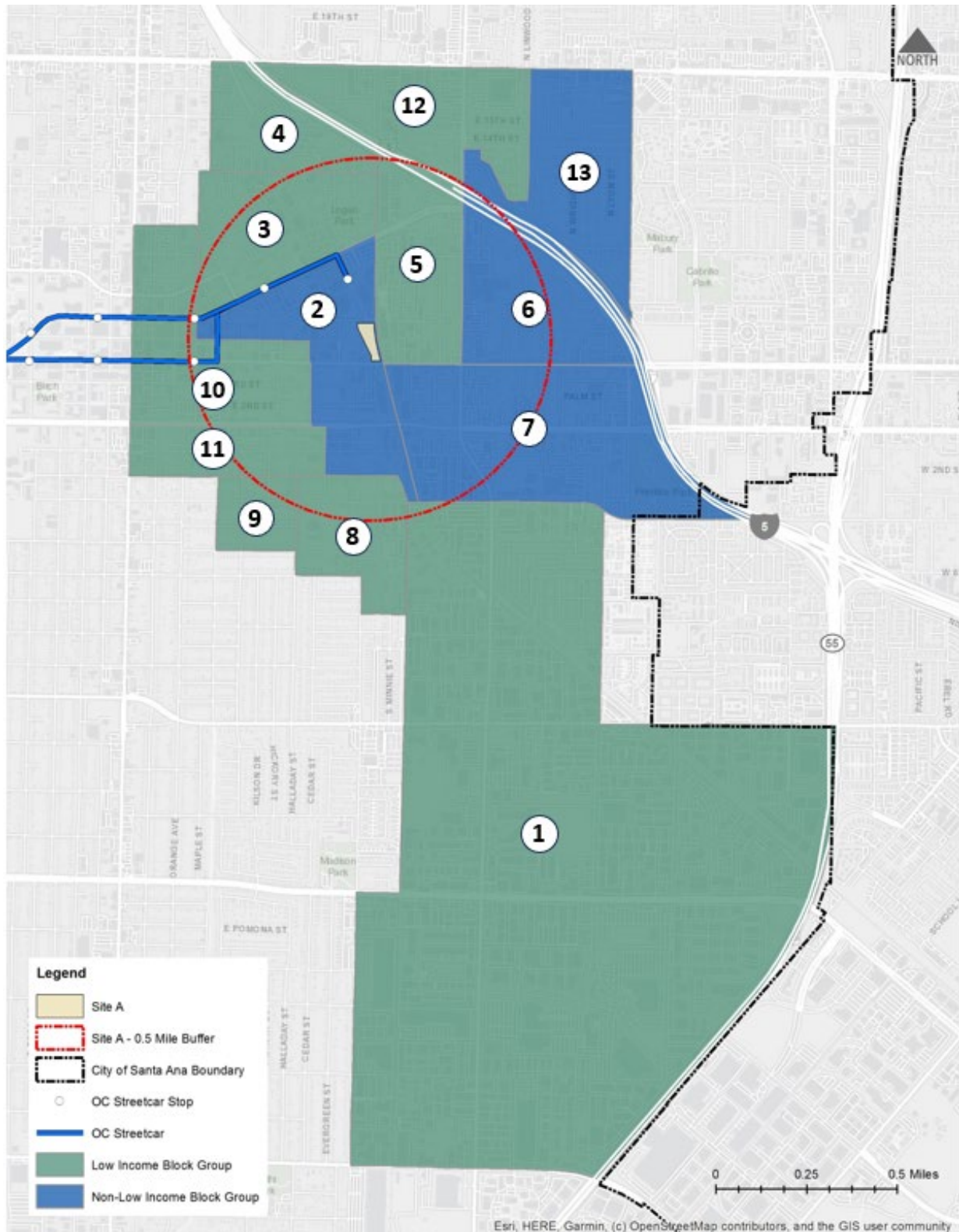
Table 5. Site A – Low-Income Population (2010)

Map ID	Geography	Population for whom Poverty Status is Determined ¹	Low-Income Population		Low-Income Block Group
		Number	Number	Percent	
-	Site A	26,185	6,898	26.3%	-
1	CT 744.03, BG 1	2,886	953	33.0%	Yes
2	CT 744.05, BG 1	1,615	283	17.5%	No
3	CT 744.05, BG 2	2,223	452	20.3%	Yes
4	CT 744.05, BG 3	1,925	559	29.0%	Yes
5	CT 744.06, BG 1	1,225	448	36.6%	Yes
6	CT 744.06, BG 2	1,505	67	4.5%	No
7	CT 744.06, BG 3	1,264	188	14.9%	No
8	CT 745.01, BG 1	2,419	702	29.0%	Yes
9	CT 746.02, BG 2	2,467	1,006	40.8%	Yes
10	CT 750.02, BG 2	2,450	495	20.2%	Yes
11	CT 750.02, BG 3	2,794	797	28.5%	Yes
12	CT 754.03, BG 2	1,706	843	49.4%	Yes
13	CT 754.03, BG 4	1,706	105	6.2%	No
-	Santa Ana	317,478	56,866	17.9%	-
-	Orange County	2,925,244	296,846	10.1%	-

¹ Defined as the population for whom poverty status is determined by the Census Bureau. Excludes persons living in college dormitories and institutional group quarters.

Source: 2010 ACS 5-Year Estimates, Table B17021

Figure 5. Site A – Low Income Population (2010)



Source: 2010 ACS 5-Year Estimates, Table B17021

OCTA

Title VI Equity Analysis: Streetcar MSF Site

Low-income populations are less prominently concentrated in the vicinity of Site B as compared to Site A. As summarized in Table 6 and illustrated in Figure 6, less than half of the block groups that fall within a half-mile of Site A have a higher share of low income populations than the City of Santa Ana (4 out of 10 block groups, or 40 percent). Taken as a whole, low-income populations account for 16.2 percent of the total population of block groups within a half-mile of Site B, compared to 17.9 percent for the city.

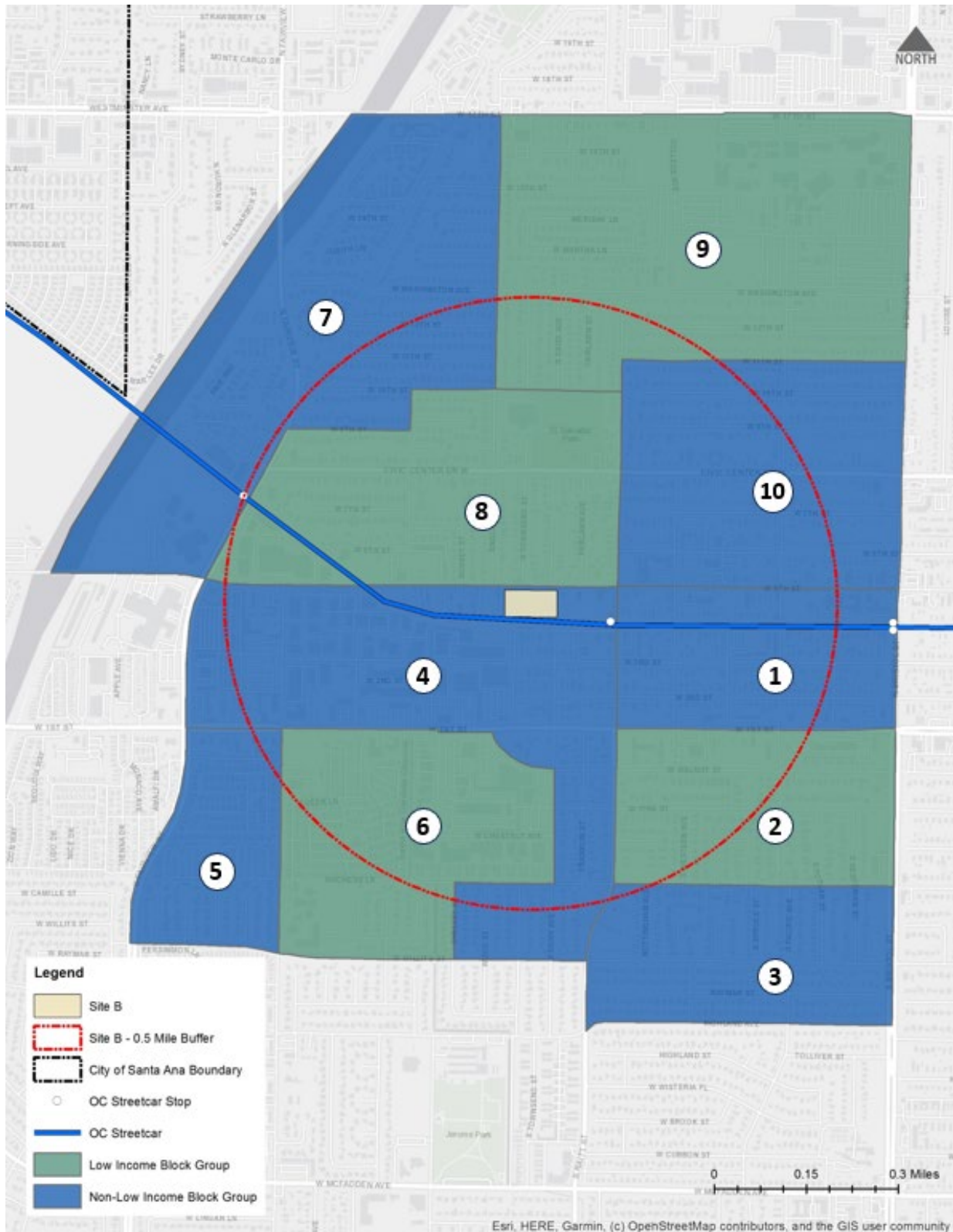
Table 6. Site B – Low-Income Population (2010)

Map ID	Geography	Population for whom Poverty Status is Determined ¹	Low-Income Population		Low-Income BG
		Number	Number	Percent	
-	Site B	23,589	3,825	16.2%	-
1	CT 748.01, BG 1	1,641	215	13.1%	No
2	CT 748.01, BG 2	2,278	640	28.1%	Yes
3	CT 748.01, BG 3	2,366	397	16.8%	No
4	CT 748.02, BG 1	2,132	114	5.3%	No
5	CT 748.02, BG 2	2,101	345	16.4%	No
6	CT 748.02, BG 3	1,946	578	29.7%	Yes
7	CT 752.01, BG 1	3,354	352	10.5%	No
8	CT 752.01, BG 2	2,255	529	23.5%	Yes
9	CT 752.02, BG 1	2,173	417	19.2%	Yes
10	CT 752.02, BG 2	3,343	238	7.1%	No
-	Santa Ana	317,478	56,866	17.9%	-
-	Orange County	2,925,244	296,846	10.1%	-

¹ Defined as the population for whom poverty status is determined by the Census Bureau. Excludes persons living in college dormitories and institutional group quarters.

Source: 2010 ACS 5-Year Estimates, Table B17021

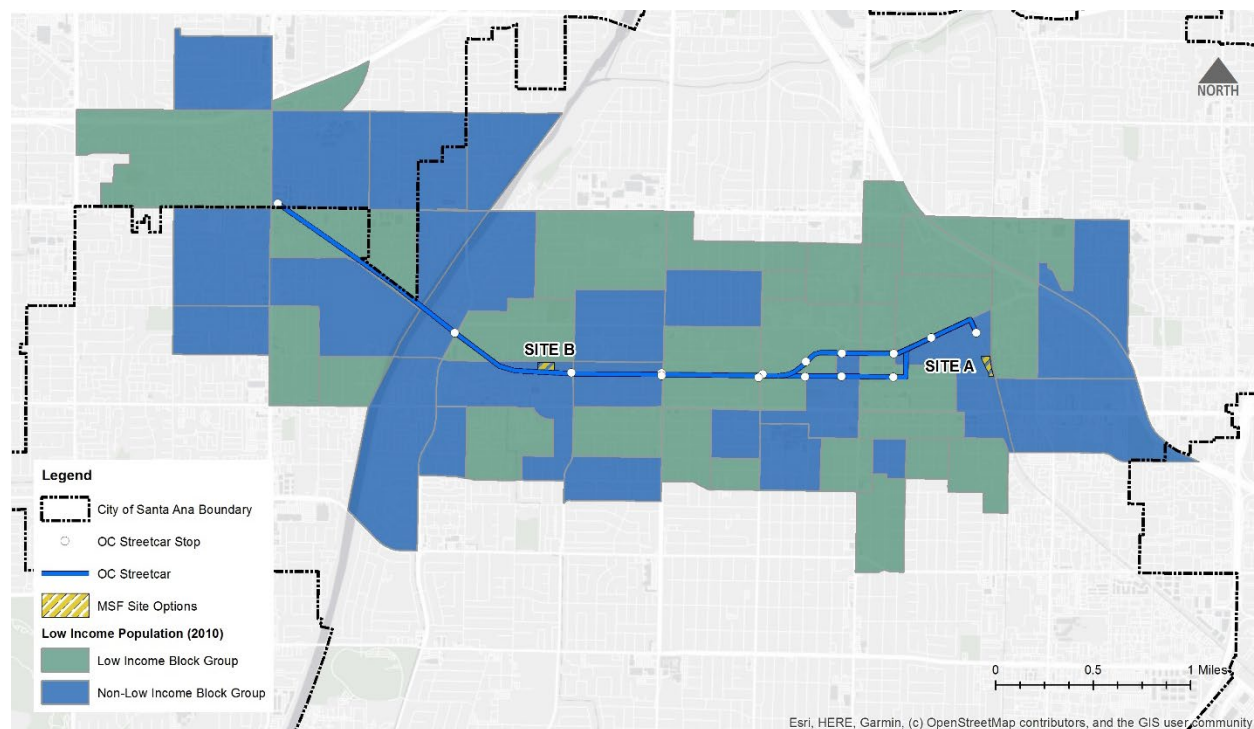
Figure 6. Site B – Low-Income Population (2010)



Source: 2010 ACS 5-Year Estimates, Table B17021

For additional context, a review of low-income populations was also conducted for the entire streetcar corridor. As illustrated in Figure 7, a majority of the block groups within a half-mile of the streetcar alignment have a higher percentage of low-income populations than the City of Santa Ana (30 out of 54 block groups, or 56 percent).

Figure 7. Streetcar Corridor – Low-Income Populations (2010)



Source: 2010 ACS 5-Year Estimates, Table B17021

5.2 Equity Impacts

In evaluating a facility site in the context of Title VI, it is necessary to understand who will be directly impacted and whether any potential impacts may be mitigated. Both potential MSF sites are located within areas that have minority persons and persons living in poverty. While the demographic data summarized previously represent population characteristics for block groups within one-half mile of a potential site, it does not identify who will be directly impacted by the siting of the MSF. Therefore, an evaluation was completed to better understand if residents or businesses will be directly impacted and/or displaced and if there are similar or compatible facilities or land uses adjacent to the potential MSF sites. The results of this evaluation are summarized in Table 7.

Table 7. Equity Impact Comparison

Site	Are there adjacent residential uses that would be impacted by selecting site?	Will selecting site require displacement?	Other similar facilities/uses nearby ¹
Site A	<ul style="list-style-type: none"> No adjacent existing residential uses 	<ul style="list-style-type: none"> Business displacement: 1 business to be relocated 	<ul style="list-style-type: none"> Industrial Commercial
Site B	<ul style="list-style-type: none"> Single-family residential uses to the north and south of the site 	<ul style="list-style-type: none"> Business displacement: 1 business to be relocated. Residential displacement: 6 multi-family housing structures 	<ul style="list-style-type: none"> Industrial Commercial

¹ Similar facilities include industrial, manufacturing, parking/storage, transportation, warehousing, etc.

While both candidate MSF sites require business displacements, Site B also requires displacement of six multi-family residential units. However, further evaluation of the residential units indicates no displacement may actually be necessary. The units are located in an industrial-zoned area, suggesting they may have been allowed to remain with a variance. Furthermore, data provided by the City of Santa Ana confirmed that the units had been red tagged, indicating that they are not safe for occupancy.

6.0 COMMUNITY OUTREACH

A comprehensive public outreach process was a major component of the Santa Ana-Garden Grove Fixed Guideway Project from the start. Well in advance of any key decisions, the cities initiated a dialogue with the community and a public scoping process to help define the appropriate range of issues to be addressed in the AA and EA/DEIR. As a key component of the project, the potential MSF sites were presented for consideration and feedback during these activities. Equity considerations were at the forefront of the outreach efforts. Specific outreach activities that were conducted to ensure participation from communities of environmental justice concern include:

- Identifying and meeting with environmental justice stakeholders, including Templo Calvario, neighborhood associations, labor unions members, and senior centers.
- Establishing a project information hotline with outgoing messages in English and Spanish.
- Translating and submitting notices for publication in Spanish language newspapers (Excelsior, May 2010; Miniondas, June 2010).
- Making notices and information available on the Public Law Center’s website, which is a pro-bono law firm serving low-income communities in the City of Santa Ana and Orange County.

OCTA*Title VI Equity Analysis: Streetcar MSF Site*

- Translating presentation boards during scoping meetings, which followed an open house format.
- Making available City of Santa Ana and consultant staff that were fluent in Spanish and familiar with the project at the scoping meetings.
- Translating comment forms on which community members could submit comments in English or Spanish

There was limited public comment or discussion about the potential MSF sites during the public review of the EA/DEIR. However, size, location, connectivity, and opportunities for future expansion were considerations in the limited discussion of the two candidate sites. A brief summary of public outreach activities is provided in Table 8.

Table 8. Public Outreach Activities

Date	Event	Location
January 2010 – June 2014	Stakeholder Working Group meetings	Various locations throughout the project study area
May – June 2010	Public scoping meetings (4x)	Various locations throughout the project study area
During Alternatives Assessment	Door to door survey of 230+ businesses in the downtown area	Various locations throughout the project study area
June 14, 2014	EA/DEIR Public Review Meeting	Garfield Community Center 501 N. Lacy St Santa Ana, 92701
June 17, 2014	EA/DEIR Public Review Meeting	Santa Ana Police Department Community Room 60 Civic Center Plaza Santa Ana, 92703
June 19, 2014	EA/DEIR Public Review Meeting	Goodwill Industries 412 N. Fairview St Santa Ana, 92703

Sources: *Santa Ana and Garden Grove Fixed Guideway Corridor Project: Operations and Maintenance Facility Site Review*, January 2011; *Environmental Assessment/Draft Environmental Impact Report*, May 2014.

7.0 CONCLUSION

This report documents that OCTA has evaluated minority and low-income populations in the vicinity of the two potential MSF sites. The evaluation indicated the streetcar study area as a whole is predominantly populated by minority block groups, while low-income block groups are more evenly dispersed. Both sites had a higher percentage of minority populations than the City of Santa Ana, with Site A also having a higher percentage of low-income populations. Table 9 provides a comparison of minority populations, low-income populations, and estimated displacements for each potential MSF site.

Table 9. Comparison of Demographic Data and Displacements

Site	Percentage of Minority Population Greater than City of Santa Ana Average (90.4%)	Percentage of Low-Income Population Greater than City of Santa Ana Average (17.9%)	Estimated Number of Displacements
Site A	Yes (91.9%)	Yes (26.3%)	Business: 1
Site B	Yes (98.3%)	No (16.2%)	Business: 1 Residential: 6 multi-family units ¹

¹ Further research indicated these units were previously red tagged by the City of Santa Ana, eliminating the need for residential displacements.

Source: 2010 ACS 5-Year Estimates, Tables B03002 and B17021

As documented in this equity analysis, the MSF site selection process, which was conducted concurrently with the EA/DEIR process for the Santa Ana and Garden Grove Fixed Guideway Corridor project, has demonstrated the following:

- Impacts of the various siting options were evaluated prior to the final selection of the preferred site;
- Multiple outreach efforts to persons in the community were conducted; and
- The diversity of potential MSF sites evaluated and the demographic characteristics of the streetcar corridor as a whole demonstrated that sites were not selected for evaluation on the basis of race, color, or national origin.

Site B was selected as the preferred site because of its close proximity to the streetcar alignment and its size could accommodate the full range of O&M functions and future system expansion. While the site does include six multifamily structures, further research indicated that these units had previously been red tagged by the city, eliminating the need for residential relocations.

Furthermore, the selection of Site B would not result in any cumulative adverse impacts due to the presence of other facilities with similar impacts in the area. Site B is located in an area of industrial and commercial uses. While there are residential uses to the north and south, the proposed use of the site would be more compatible than the existing waste transfer facility because it would operate with lower intensity industrial usage. Therefore, the cumulative adverse impacts of the MSF would be lower than the legacy uses on the selected site.

Additionally, several mitigation measures and improvements have been identified to ensure that the selection of Site B would not result in any significant impacts to the adjacent residential land uses. Such mitigation measures and improvements include sound barriers on the northern and southern property boundaries, perimeter security fencing, and enhanced pedestrian facilities.

OCTA
Board Approval of Title VI Plan



AFFILIATED AGENCIES

*Orange County
Transit District*

*Local Transportation
Authority*

*Service Authority for
Freeway Emergencies*

*Consolidated Transportation
Service Agency*

*Congestion Management
Agency*

MINUTES EXCERPT

The following is an excerpt from the Minutes of the Orange County Transportation Authority (OCTA) Board of Directors (Board) meeting held on **September 9, 2024**.

14. 2024 Title VI Service Standards, Policies, and Service Monitoring Program

A motion was made by Director Foley, seconded by Director Sarmiento, and declared passed, to review and approve Orange County Transportation Authority's service standards, policies, and service monitoring results.

15. 2024 Title VI Plan Triennial Report

A motion was made by Director Foley, seconded by Director Sarmiento, and declared passed, to review, approve, and direct staff to submit the 2024 Title VI Plan Triennial Report to the Federal Transit Administration's Regional Office of Civil Rights on or before October 1, 2024.

The preceding excerpt will be presented to the Board of Directors on September 23, 2024, as part of the completed minutes of the September 9, 2024, OCTA Board of Directors' meeting.

A handwritten signature in blue ink, appearing to read 'Gina Ramirez', is positioned above a horizontal line.

Gina Ramirez
Assistant Clerk of the Board

Dated: September 12, 2024

OCTA
Bus Service Standards & Policies

**ORANGE COUNTY TRANSPORTATION AUTHORITY
SYSTEMWIDE BUS SERVICE STANDARDS AND POLICIES**

TARGET SERVICE STANDARDS	LOCAL ROUTES (1-99 series)	BUS RAPID TRANSIT LIMITED (500-series)	COMMUNITY ROUTES (100-199 series)	EXPRESS ROUTES (200, 700-series)	RAIL FEEDER ROUTES (400-series)	SPECIAL EVENTS (600-series)
SPAN OF SERVICE:						
WEEKDAY:	5:30 A.M. - 8:30 P.M.	5:30 A.M. - 8:30 P.M. (1)	5:30 A.M. - 8:30 P.M. (1)	(1)	(1)	N/A
WEEKENDS & HOLIDAYS	7:00 A.M. - 7:00 P.M.	7:00 A.M. - 7:00 P.M.	7:00 A.M. - 7:00 P.M.	N/A	N/A	N/A
Span is defined as the first and last trips departing the terminal of origin.						
<i>(1) Based on Demand</i>						
PERFORMANCE STANDARDS:						
BOARDINGS/REVENUE VEHICLE HOUR						
SEAT OCCUPANCY						
ROUTE:	N/A	N/A	N/A	50%	N/A	N/A

TITLE VI SERVICE STANDARDS AND POLICIES

TIME PERIOD DEFINITIONS:

WEEKDAY PEAK PERIODS: 6 A.M. - 9 A.M. AND 3 P.M. - 6 P.M.

OFF-PEAK: WEEKDAYS OFF-PEAK ARE THE PERIODS PRECEDING OR FOLLOWING THE DEFINED A.M. AND P.M. PEAK PERIODS, AND ALL-DAY ON WEEKENDS. AND ALL-DAY ON WEEKENDS AND HOLIDAYS

LOADING STANDARDS:

Policy: The average of all loads during the weekday peak periods should not exceed achievable vehicle capacity which is 20 to 26 passengers for intermediate size buses; 44 to 49 passengers for low floor 40-foot buses; and 83 passengers for 60-foot buses.

<u>Vehicle Type</u>	<u>Average Passenger Capacities</u>				
	<u>Seated</u>	<u>Standing</u>	<u>Total</u>	<u>Maximum Load Factor</u>	<u>Maximum Load Factor %</u>
26' Cut-Away Bus	20	N/A	20	1.0	100%
31' Cut-Away Bus	26	N/A	26	1.0	100%
40' Standard Bus*	34	10	44	1.3	130%
40' Standard Bus*	36	10	46	1.3	130%
40' Standard Bus*	37	11	48	1.3	130%
40' Standard Bus*	38	11	49	1.3	130%
60' Articulated Bus	64	19	83	1.3	130%

*OCTA standard 40-foot buses vary in seats provided, from 34-seats on buses used for freeway express service to 38-seats on LNG buses.

ORANGE COUNTY TRANSPORTATION AUTHORITY
SYSTEMWIDE BUS SERVICE STANDARDS AND POLICIES

TARGET LOAD STANDARDS BY SERVICE TYPE:	LOCAL ROUTES (1-99 series)	BUS RAPID TRANSIT LIMITED (500-series)	COMMUNITY ROUTES (100-199 series)	EXPRESS ROUTES (200, 700-series)	RAIL FEEDER ROUTES (400-series)	SPECIAL EVENTS (600-series)
WEEKDAY PEAK PERIOD(% SEATS):	130%	130%	130%	100%	130%	N/A
OFF-PEAK/WEEKEND (% SEATS):	100%	100%	100%	N/A	N/A	N/A

HEADWAYS:

*Policy: Service operates on Local Routes (1-99 series) and Bus Rapid Transit/Limited Stop Routes (500-series) every 30-minutes or better during weekdays and weekends.
Service operates on Community Routes (100-199 series) every 60-minutes or better during weekdays and weekends.
Service operates on Express Routes (200-series and 700-series), and Rail Feeder Routes (400-series) weekdays only with a minimum of two trips scheduled in the morning and afternoon commute periods.
Service operates on Special Event Routes (600-series) for a limited period of time with service scheduled to meet the needs of the event.*

TARGET HEADWAY STANDARDS:	LOCAL ROUTES (1-99 series)	BUS RAPID TRANSIT LIMITED (500-series)	COMMUNITY ROUTES (100-199 series)	EXPRESS ROUTES (200, 700-series)	RAIL FEEDER ROUTES (400-series)	SPECIAL EVENTS (600-series)
PEAK WEEKDAY PERIOD (6-9 A.M., 3-6 P.M.):	30 MIN	30 MIN	60 MIN	(2)	(2)	N/A
OFF-PEAK/WEEKENDS:	30 MIN	30 MIN	60 MIN	N/A	N/A	N/A

(2) Minimum two one-way trips per peak weekday period.

ON-TIME PERFORMANCE STANDARDS

Defined: Measured at the timepoint, a trip is on-time as long as it does not leave the timepoint ahead of the scheduled departure time, and no more than 5-minutes later than the scheduled departure time.

Standard : Change to 85% at the line level as reliable On-Time Performance measuring system becomes available.

Exclusions: Early departure times at timepoints located within Free Running time route segments will be considered to be On-Time.

Stationlink routes OTP is measured for trips scheduled to arrive at Metrolink Stations in the P.M.

TARGET ACCESSIBILITY STANDARDS

% OF SERVICE AREA POPULATION & JOBS WITHIN 1/2 MILE OF A BUS ROUTE: 90% OR HIGHER

OCTA
Vehicle Assignment Policy



Operations Division


Chief Operating Officer


Deputy CEO

VEHICLE ASSIGNMENT POLICY

Policy#: OPS-510.16VEHASSIGN

Origination Date: 02/24/2014

Revised Date: 01/03/2024

I. PURPOSE

The purpose of this policy is to document and guide fleet deployment practices to ensure that impacts associated with age and state-of-good repair (condition) are shared equitably throughout the Orange County Transportation Authority (OCTA) service area. Also, that deployment practices are consistent with the Federal Transit Administration's (FTA) guidance documented in Title VI Circular 4702.1B: Vehicle Assignment Policy.

II. ORGANIZATIONAL UNITS AFFECTED

The execution and support for the Vehicle Assignment Policy is a joint responsibility of the departments identified in Section V.E. of this document.

III. POLICY

Vehicle assignment takes into consideration variables such as service type, operating environment constraints and limitations, passenger demand, and local community needs. Buses vary in terms of type, age, and condition (or state-of-good repair) since bus procurements are spread over multiple years. Consequently, included in the Vehicle Assignment Policy is the FTA requirement to assess deployment practices and associated impacts on specific segments of the community from both a Title VI and Environmental Justice perspective.

The pertinent section of the FTA's Title VI Circular 4702.1B states:

“Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.”

Operations Division
VEHICLE ASSIGNMENT POLICY

Policy#: OPS-510.16VEHASSIGN

Origination Date: 02/24/2014

Revised Date: 01/03/2024

Through this policy, transit bus assignment will carefully consider such impacts and implement mitigation measures to avoid potential disparate community impacts to the extent possible.

IV. DEFINITIONS

- A. Transit Bus** – A multi-passenger vehicle designed for passenger pick-up and discharge at bus stops established at fixed locations on streets and at terminals. The transit buses are scheduled to operate along a fixed route within and/or between communities within the OCTA service area. All transit buses are designed to accommodate passengers using wheelchairs.
- B. Transit Bus Types** – Transit bus types vary to accommodate local roadway constraints and community preferences. Typically, transit buses vary in length and seating capacity. Longer buses generally offer more seats and standee area. Transit bus types in the current OCTA fleet include:
 - 1. Standard size transit buses (40-foot) are the most common transit bus in the OCTA fleet and generally seat from 34 to 38 passengers and will accommodate standees. Most standard size buses are powered by compressed natural gas (CNG), fuel cell electric battery, or a battery-electric bus, and a small number of diesel-powered buses are maintained for temporary use should either additional capacity be required immediately or a significant segment of the alternative powered fleet become unavailable for service. Future bus purchases are planned to be CNG or zero-emission technologies.
 - 2. Large articulated transit buses (60-foot) are specialized transit buses seating in excess of 56 passengers. They are used on routes where peak passenger loads are highest and where bus stops can accommodate the additional bus length. OCTA's articulated transit buses are CNG-powered.
 - 3. Medium size transit buses (25- to 35-foot) are specialized buses used in applications where passenger demand may be lower than average and/or operating conditions require the use of smaller vehicles. These vehicles are all currently CNG-powered. Standees are not permitted on these vehicles.

V. TRANSIT BUS DEPLOYMENT PROCEDURE

- A. Equipment Assignment** – As part of the service change programs developed during the year, the Maintenance and Scheduling departments jointly develop a deployment plan that guides the assignment of specific bus types to specific bus routes operated by OCTA. Passenger demand, local community requirements, service application, bus stop length, bus garage proximity to individual bus routes, and specialized maintenance concerns are considered when developing the vehicle assignment policy.

Operations Division
VEHICLE ASSIGNMENT POLICY

Policy#: OPS-510.16VEHASSIGN

Origination Date: 02/24/2014

Revised Date: 01/03/2024

- B. Fleet age** – The age of the fleet can be used as an indicator for vehicle condition since newer vehicles show less wear and tear and are usually less prone to premature service failure. OCTA fleet age varies from new to 26 years of age. The oldest vehicles are diesel-powered and are assigned to the Contingency Fleet.
- C. Title VI/Environmental Justice Impact Assessments** – As part of the vehicle assignment policy development, an assessment is conducted to measure the age of the vehicles at both the system and bus route level of detail. Minority routes, as defined in the most recent version of the Service and Fare Change Evaluation Policy, are reviewed and compared with non-minority routes to assess average vehicle age. Should a disparate impact or disproportionate burden be discovered, mitigation measures are used where possible to correct the imbalance. Mitigation measures may include reassignment of vehicles and/or bus routes between operating bases. Should mitigation measures not be immediately available, issues are documented, and a remediation plan is developed to address the issue as new, or replacement vehicles are produced.
- D. Advertisements** – Using a vendor, OCTA sells exterior advertising on the revenue vehicle fleet. The majority of the advertising is randomly placed on buses that travel throughout the service area. As advertisements age, particularly those that advertise events on specific dates, new advertisements replace them. The placement of the advertising on OCTA revenue vehicles is not based on vehicle deployment; however, the Marketing Department may request that certain advertisements operate in specific areas. This request is accommodated if it is operationally feasible and if the deployment supports an equitably distributed revenue vehicle fleet throughout the OCTA service area.
- E. Responsibilities** – Multiple OCTA departments work together to implement this policy.

 - 1. Maintenance Department:**

 - a.** Maintain and update vehicle records.
 - b.** Publish updated Equipment Assignment Report each service change or when needed.
 - 2. Scheduling Department:**

 - a.** Assist Maintenance Department with Equipment Assignment Report for each service change.
 - b.** Assist with mitigation plan development, if necessary.
 - 3. Planning Department:**

 - a.** Identify minority routes as required by Title VI and Environmental Justice regulations.
 - b.** Assess conformity annually with Title VI and Environmental Justice.

Operations Division
VEHICLE ASSIGNMENT POLICY

Policy#: OPS-510.16VEHASSIGN

Origination Date: 02/24/2014

Revised Date: 01/03/2024

c. Grant Development - If applicable, identify and notify OCTA departments of equipment assignment requirements for grant programs to ensure eligibility.

4. Grants Department:

Notify FTA of changes to the Equipment Assignment as may be required.

5. Marketing Department:

Oversee the placement of advertising on all revenue vehicles.

VI. EXCEPTIONS

OCTA reserves the right to change this policy at any time without prior notice. OCTA has the authority to make exceptions to this policy as required by business needs. Any exceptions must be authorized by the Chief Executive Officer. If any changes are made, the revised policy will be posted on OCTA Today.

VII. PROVISIONS AND CONDITIONS

Not applicable.

VIII. RELATED DOCUMENTS

A. FTA Circular 4702.1B

B. Service and Fare Change Evaluation Policy (EO-520.02SERVICE)

END OF POLICY

**OCTA
Minority Routes**

Attachment Q - Minority Routes

Route	Route Description	Route Type	Total Route Length (Miles)	Route Length (Miles) within Minority Area	Percent of Route within Minority Area
1	Long Beach - San Clemente	Local	49.5	2.1	4.3%
25	Fullerton - Huntington Beach	Local	18.2	8.9	48.8%
26	Buena Park - Yorba Linda	Local	13.6	8.2	60.0%
29	LaHabra - Huntington Beach	Local	26.4	16.4	62.4%
30	Cerritos - Anaheim	Local	20.5	12.5	61.1%
33	Fullerton - Huntington Beach	Local	15.9	9.5	59.4%
35	Fullerton - Huntington Beach	Local	19.0	12.7	66.6%
37	La Habra - Fountain Valley	Local	20.0	16.0	80.1%
38	Lakewood - Anaheim Hills	Local	22.0	11.4	51.9%
42	Orange - Seal Beach	Local	25.7	14.2	55.3%
43	Fullerton - Costa Mesa	Local	19.3	14.7	76.1%
46	Long Beach - Orange	Local	17.1	9.6	56.2%
47	Fullerton - Newport Beach	Local	22.8	16.1	70.7%
50	Long Beach - Orange	Local	22.5	7.8	34.7%
53	Orange - Irvine	Local	14.5	10.5	72.2%
54	Garden Grove - Orange	Local	19.3	11.5	59.2%
55	Santa Ana - Newport Beach	Local	21.4	10.9	51.1%
56	Garden Grove - Orange	Local	16.2	10.8	66.8%
57	Brea - Newport Beach	Local	26.1	14.2	54.3%
59	Anaheim - Irvine	Local	20.0	14.0	69.9%
60	Long Beach - Tustin	Local	25.0	13.6	54.3%
64	Huntington Beach - Tustin	Local	12.6	11.4	90.7%
66	Huntington Beach - Irvine	Local	17.8	14.6	82.0%
70	Sunset Beach - Tustin	Local	18.0	11.4	63.3%
71	Yorba Linda - Newport Beach	Local	24.6	10.3	41.8%
72	Sunset Beach - Tustin	Local	16.7	11.4	67.9%
76	Huntington Beach - Newport Beach	Local	14.2	7.8	54.7%
79	Tustin - Newport Beach	Local	19.1	7.4	38.5%
82	Mission Viejo - Rancho Santa Margarita	Local	8.7	0.5	6.1%
83	Anaheim - Laguna Hills	Local	30.5	22.4	73.5%
85	Mission Viejo - Dana Point	Local	13.2	0.0	0.0%
86	Costa Mesa - Mission Viejo	Local	20.5	8.1	39.7%
87	Rancho Santa Margarita - Laguna Niguel	Local	15.4	1.8	11.4%
89	Lake Forest - Laguna Beach	Local	14.4	1.4	9.7%
90	Tustin - Dana Point	Local	21.8	3.4	15.5%
91	Mission Viejo - Laguna Hills	Local	22.7	5.0	22.2%
123	Anaheim to Huntington Beach	Community	27.0	12.4	46.1%
129	La Habra - Anaheim	Community	14.1	9.4	66.5%
143	La Habra - Brea	Community	14.1	8.6	61.3%
150	Santa Ana - Costa Mesa	Community	12.3	12.3	100.0%
167	Anaheim - Irvine	Community	24.1	9.7	40.3%
177	Foothill Ranch - Laguna Hills	Community	11.1	1.8	16.1%
178	Huntington Beach - Irvine	Community	17.0	1.7	10.1%
453	Orange Metrolink Station - Orange	Stationlink	3.5	3.2	92.7%
472	Tustin Metrolink Station to Irvine	Stationlink	8.9	5.8	65.0%
473	Tustin Metrolink Station to UCI	Stationlink	6.3	3.5	56.7%
480	Irvine Metrolink Station - Irvine Spectrum	Stationlink	8.9	2.3	25.4%
529	Goldenwest Transportation Center - Fullerton Park and Ride	Rapid	11.2	9.7	86.9%
543	Fullerton - Costa Mesa	Rapid	12.7	11.9	93.4%
553	Orange - Santa Ana	Rapid	10.9	9.0	82.4%
560	Santa Ana - Long Beach	Rapid	10.9	10.9	100.0%
862	Downtown Santa Ana Shuttle	Shuttle	2.3	2.3	100.0%

More than 1/3 of Overall Route Length in Minority Area
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OCTA
**Board Approval of OCTA's Service Standards,
Policies, and Service Monitoring**



AFFILIATED AGENCIES

Orange County
Transit District

Local Transportation
Authority

Service Authority for
Freeway Emergencies

Consolidated Transportation
Service Agency

Congestion Management
Agency

MINUTES EXCERPT

The following is an excerpt from the Minutes of the Orange County Transportation Authority (OCTA) Board of Directors (Board) meeting held on **September 9, 2024**.

14. 2024 Title VI Service Standards, Policies, and Service Monitoring Program

A motion was made by Director Foley, seconded by Director Sarmiento, and declared passed, to review and approve Orange County Transportation Authority's service standards, policies, and service monitoring results.

15. 2024 Title VI Plan Triennial Report

A motion was made by Director Foley, seconded by Director Sarmiento, and declared passed, to review, approve, and direct staff to submit the 2024 Title VI Plan Triennial Report to the Federal Transit Administration's Regional Office of Civil Rights on or before October 1, 2024.

The preceding excerpt will be presented to the Board of Directors on September 23, 2024, as part of the completed minutes of the September 9, 2024, OCTA Board of Directors' meeting.

A handwritten signature in blue ink, appearing to read 'Gina Ramirez', is positioned above a horizontal line.

Gina Ramirez
Assistant Clerk of the Board

Dated: September 12, 2024



Executive Office

Chief Executive Officer

SERVICE AND FARE CHANGE EVALUATION POLICY

Policy#: EO-520.02SERVICE

Origination Date: 11/26/2012

Revised Date: 07/21/2023

I. PURPOSE

The purpose of this policy is to establish how the Orange County Transportation Authority (OCTA) evaluates major service and fare changes to determine whether they will have a discriminatory impact based on race, color, or national origin and whether they will have a disproportionately high and adverse impact on minority populations and/or low-income populations.

II. ORGANIZATIONAL UNITS AFFECTED

- A. The Planning Division is responsible for determining if a particular service change meets the definition of a “Major Service Change.”
- B. The Planning Division is responsible for completing service equity analysis documents as required.
- C. The Finance and Administration Division is responsible for completing fare equity analysis documents as required.
- D. The Public Outreach Department is responsible for engaging the public to actively seek comments, suggestions, and input in the decision-making process for both major service changes and fare changes through community outreach efforts as outlined in the Public Involvement Plan.
- E. The People and Community Engagement Division is responsible for coordinating Federal Transit Administration (FTA) review of service and fare equity analysis documents.
- F. The Operations Division is responsible for bus operations planning and service delivery that support the service changes.

III. POLICY

- A. Major Service Change – A major service change is defined as a numerical standard, as expressed by the distribution of routes as measured against the existing level of service. The following is considered a major service change (unless otherwise noted in Section VI):
 - 1. Route Alignment Reduction or Elimination
Reducing an existing route by more than 50 percent of directional route miles or; reducing an existing route by more than 50 percent of bus stops.
 - 2. Route Alignment Extension or New Route

Executive Office
SERVICE AND FARE CHANGE EVALUATION POLICY

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Origination Date: 11/26/2012

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Adding a new route or a route segment that increases directional route miles of an existing route by more than 50 percent and when more than 50 percent of the new service bus stops are along currently unserved street segments.

3. Route Level Service Hour Change

Increase or decrease of the following levels of service on a route within 12 months: Weekday service increase or decrease of 25 percent or more annualized vehicle revenue hours, or weekend service increase or decrease of 25 percent or more annualized vehicle revenue hours.

4. Systemwide Service Hour Change

Increase or decrease of 25 percent of annualized vehicle revenue hours for all routes within 12 months.

B. Fare Change – All fare increases or reductions are considered a fare change unless otherwise noted in Section VI.

C. Disparate Impact/Disproportional Burden Thresholds – When conducting a fare or service equity analysis, the following thresholds will be used to determine when a change would have a disparate impact:

1. Service Changes

a) Route Alignment Reduction or Elimination

If the resulting alignment of a route alignment reduction serves a lower percentage of minority and/or low-income population than the existing route alignment service coverage or if an identified low-income and/or minority route is eliminated.

b) Route Alignment Extension or New Route

If a new route alignment after the proposed alignment extension serves a lower percentage of minority and/or low-income population than the average minority and/or low-income population for the entire service area or if a new route serves a lower percentage of minority and/or low-income population than the average minority and/or low-income population for the entire service area.

c) Route Level Service Hour Change

If a proposed route level headway for a minority and/or low-income route is longer than the average headway for non-minority and/or non-low-income routes for the same service type and time period or if a proposed route level headway for a non-minority and/or non-low-income route is shorter than the average headway for minority and/or low-income routes for the same service type and time period.

Executive Office
SERVICE AND FARE CHANGE EVALUATION POLICY

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Origination Date: 11/26/2012

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d) Systemwide Service Hour Change

If the proposed average systemwide headways for minority and/or low-income routes is longer than the average systemwide headways for non-minority and/or non-low-income route for the same service type and time period or if the proposed average systemwide headways for non-minority and/or non-low-income routes is shorter than the average headway for minority and/or low-income routes for the same service type and time period.

2. Fare Change

Disparate impact/disproportional burden will only be considered if the increase in fare product for minority and/or low-income populations is greater than ten percent compared to non-minority and/or low income.

- D. Public Involvement** – The public was engaged in developing this policy as documented in the Public Involvement Plan. The public will be engaged in any changes to this policy prior to approval. The Public Involvement Plan also documents the outreach activities required prior to a major service or fare change.
- E. Board of Directors (Board) Review** – Service and fare equity analysis documents will be presented to the OCTA Board prior to implementation of major service or fare changes. The documents will be presented to the Transit Committee as a receive-and-file report.

IV. DEFINITIONS

- A. Disparate Impact** – A facially neutral policy or practice that has a disproportionately excluding or adverse effect on the minorities or low-income segments of the service area.
- B. Disparate Treatment** – An action that results in a circumstance in which minority persons are treated differently than others because of their race, color, national origin, and/or low-income status.
- C. Disproportional Burden** – The statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations.
- D. Low Income Persons** – A person with an income of 80 percent or less of the national per capita income. “Low Income Areas” are residential land-use areas within census tracts where the average per capita income is 80 percent or less of the national per capita income.
- E. Low Income Transit Route** – A route where at least 20 percent of the land within one-half mile of the route alignment is a “Low Income Area.”
- F. Minority Persons and Areas** – Minority persons include American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian and

Executive Office
SERVICE AND FARE CHANGE EVALUATION POLICY

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Other Pacific Islanders as defined in the latest FTA Title VI Circular. "Minority Areas" are residential land-use areas within census tracts where the percentage of minority persons is higher than the Orange County average.

- G.** Minority Transit Route – A route where at least 25 percent of the land within one-half mile of the route alignment is a "Minority Area."
- H.** Seasonal Service and Special Events – Changes to bus service levels on routes which occur because of seasonal ridership changes and event activities served by dedicated temporary bus routes. Routes which have these changes are documented in OCTA's current Title VI Plan.
- I.** Temporary Detours and Closures – A short-term change to a route caused by road construction and maintenance, road closures, emergency road conditions, fiscal crisis, civil (and labor) disputes, or any other uncontrollable circumstance when the route will be returned to the prior state after the circumstance has been resolved.

V. PROCEDURE

- A.** Each service change is evaluated to determine if it is "major" and does not meet an exception in Section VI, therefore requiring an equity analysis. If a service change is not determined to be "major," it will be noted, and no further analysis will be completed. All fare changes require an equity analysis unless it meets an exception in Section VI.
- B.** Prepare service and fare equity documents as necessary using the current procedures on file with the Planning and/or Finance and Administration divisions.
- C.** Engage in public participation efforts (see Public Involvement Plan for Service and Fare Changes).
- D.** Submit completed service and/or fare equity analysis documents to the FTA via the Transit Award Management System portal.
- E.** Submit service and/or fare equity analysis documents to the OCTA Office of Civil Rights.
- F.** Submit service and/or fare equity analysis documents to the OCTA Board as described in Section III.

VI. EXCEPTIONS

- A.** The following are exemptions to the Major Service Change Policy and do not require an equity analysis:
 - 1.** Seasonal service changes.
 - 2.** Temporary detours and closures.

Executive Office
SERVICE AND FARE CHANGE EVALUATION POLICY

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3. Splitting or combining routes where the changes would not otherwise constitute a major service change.
 4. Routes being taken over by another transit provider with substantially the same headways, fare, transfer options, span of service, and stop locations. The new provider must take all valid OCTA fare media.
 5. Special event services operating for a limited period of time (less than seven consecutive months).
 6. Shuttle routes designed to act as extensions of commuter rail service, linked to specific commuter rail schedules established by the commuter rail operator.
 7. Trial service changes instituted for 180 days or less with notification to the FTA Region 9 administrator in advance of implementation.
 8. Service changes implemented in response to an emergency situation with notification to the FTA Region 9 administrator within five working days.
- B.** The following are exceptions to the Fare Change Policy and do not require an equity analysis:
1. Free fare or reduced fare promotions of less than 60 days.
 2. Seasonal passes and fares which have been reviewed for equity previously at the same proposed rate.

VII. PROVISIONS AND CONDITIONS

Not applicable.

VIII. RELATED DOCUMENTS

- A. FTA Circular 4702.1B
- B. FTA EJ Circular 4703.1
- C. OCTA Public Involvement Plan
- D. Service Change Equity Evaluation Process
- E. Fare Change Equity Evaluation Process

END OF POLICY

**OCTA
Youth Ride Free Title VI Equity Analysis, Public
Involvement Plan, & Board Approval**



COMMITTEE TRANSMITTAL

February 14, 2022

To: Members of the Board of Directors
From: Andrea West, Interim Clerk of the Board *Andrea West*
Subject: Public Hearing for the Addition of the Youth Ride Free Pass to the Orange County Transportation Authority's Fare Policy

Finance and Administration Committee Meeting of February 9, 2022

Present: Directors Goodell, Harper, Hennessey, Hernandez, Jones, Muller, and Sarmiento
Absent: None

Committee Vote

Following the roll call vote, this item was declared passed 6-1 by the Members present.

Committee Chairman Hennessey voted in opposition.

Committee Recommendations

- A. Approve the addition of the Youth Ride Free Pass to Orange County Transportation Authority's Fare Policy in order to continue the pass beyond the promotional period.
- B. Direct staff to pursue the use of Low Carbon Transit Operation Program funds to support the Youth Ride Free Pass.



February 14, 2022

To: Members of the Board of Directors

From: Darrell E. Johnson, Chief Executive Officer

Subject: Public Hearing for the Addition of the Youth Ride Free Pass to the Orange County Transportation Authority's Fare Policy

Overview

The Orange County Transportation Authority's Youth Ride Free Promotional Pass was launched in September 2021 and has been well received. Staff is requesting Board of Directors' approval to continue the Youth Ride Free Pass beyond the current promotional deadline of February 2022. Staff is recommending adding the Youth Ride Free Pass for youth riders ages 18 and under to the Orange County Transportation Authority's Fare Policy. This will enable the pass to continue beyond the promotional period. Staff is also recommending to continue to fund the pass using Low Carbon Transit Operation Program grant funds.

Recommendations

- A. Approve the addition of the Youth Ride Free Pass to Orange County Transportation Authority's Fare Policy in order to continue the pass beyond the promotional period.
- B. Direct staff to pursue the use of Low Carbon Transit Operation Program funds to support the Youth Ride Free Pass.

Background

The Orange County Transportation Authority (OCTA) launched the Youth Ride Free Promotional Pass in September 2021, to help mitigate the impacts of the coronavirus pandemic on low-income riders and to assess the usage of the promotional free ride pass. Through this program, Orange County youth ages 18 and under are eligible to use the promotional pass. Youth ages five and under are already eligible to ride for free under OCTA's current fare policy. In March 2020, the OCTA Board of Directors (Board) approved the use of Low

Carbon Transit Operation Program (LCTOP) grant funds to offset the loss in fare revenue resulting from these types of programs.

The Youth Ride Free Program has received positive feedback from riders and schools. Ridership using the promotional pass through January 22, 2022, exceeded 672,000 rides with more than 18,000 unique riders using the pass. Most trips taken are school-related trips with approximately 70 percent being high school age students. Staff provided a ridership update on the promotional pass to the Transit Committee at the January 13, 2022, meeting as well as solicited feedback on the possibility of adding the pass to OCTA's Fare Policy.

Discussion

The Youth Ride Free Promotional Pass is scheduled to end on February 28, 2022, based on Federal Transit Administration (FTA) Title VI guidelines which limit the duration of promotional or temporary fare adjustments to six months. Based on strong ridership and positive feedback from riders and the Transit Committee, staff is recommending adding the pass to OCTA's Fare Policy, which would enable OCTA to continue offering the pass beyond the current sunset date of February 28, 2022.

To consider adding the Youth Ride Free Pass to OCTA's Fare Policy, staff assessed the revenue and expense impacts to OCTA, as well as conducted a Title VI analysis as required by the FTA. Based on the ridership numbers available through the first 4.5 months of the promotional Youth Ride Free Pass, staff is estimating 1.7 million Youth Ride Free Pass boardings per year on the fixed-route system. This will result in an estimated decrease in fixed-route fare revenue of \$2.2 million per year. In addition, per the Americans with Disabilities Act (ADA), a fare for a trip charged to an ADA paratransit eligible user of complementary paratransit service shall not exceed twice the fare that would be charged to an individual paying full fare on fixed-route service. To comply with ADA requirements, OCTA will be required to provide free fares to qualifying paratransit riders 18 and under. OCTA estimates the decrease in paratransit fare revenue to be \$23,000 per year. Staff is proposing to mitigate the decrease in fare revenue associated with the Youth Ride Free Pass by continuing to use LCTOP funding, while also seeking legislation to authorize the use of LCTOP for such purpose on an ongoing basis. There is also the potential that paratransit ridership could increase due to free fares being offered to paratransit youth riders. Given the high cost to deliver paratransit service, staff evaluated whether an increase in youth paratransit ridership could result in a large cost increase to the bus system. Based on the low number of paratransit trips for riders ages 18 and under, staff does not anticipate a significant increase in paratransit costs

due to the free fare. Staff anticipates the estimated cost increase to be less than \$300,000 per year.

As a recipient of financial assistance from the FTA, OCTA is required to act in accordance with Title VI of the Civil Rights Act of 1964. To comply with the FTA requirements, OCTA shall evaluate fare changes at the planning and programming stages to determine whether they have a disparate impact on minority riders or disproportionate burden on low-income riders through a fare equity analysis. OCTA's Service and Fare Change Evaluation Policy sets the threshold for finding a disparate impact or disproportionate burden as ten percent. The analysis of the 18 and under Youth Ride Free Pass assesses whether non-low-income and non-minority riders receive a benefit of ten percent or greater than low-income and minority youth. OCTA staff conducted the Title VI analysis using on-board survey data and the analysis concluded that the Youth Ride Free Pass meets the Title VI requirements. The analysis concluded that more minority riders than non-minority riders will benefit from the fare decrease and more low-income than non-low-income riders will benefit from the fare decrease given that 91.3 percent of youth riders are minority and 51.9 percent are low-income.

In accordance with OCTA's Fare Policy and Public Involvement Plan, public outreach for the Youth Ride Free Pass started on January 13, 2022. The outreach program involved issuing public notices in the English, Spanish, and Vietnamese newspapers, email blast to schools, senior centers, employers, libraries, city halls, and a virtual community meeting was held on January 31, 2022. In addition, a public hearing will be held at the OCTA Board meeting on February 14, 2022. As of January 31, 2022, more than 581 public comments have been received. Additional details on the comments received are summarized in Attachment A.

Summary

Board of Directors' approval is requested to add the Youth Ride Free Pass to OCTA's Fare Policy in order to continue the pass beyond the promotional period. Staff is also recommending to continue to pursue the use of Low Carbon Transit Operation Program grant funds to support the free pass.

Attachment

- A. Youth Ride Free Extension Public Involvement Program

Prepared by:



Sam Kaur
Department Manager
Revenue Administration
(714) 560-5889

Approved by:



Andrew Oftelie
Chief Financial Officer
Finance and Administration
(714) 560-5649

Youth Ride Free Extension Public Involvement Program

The six-month Youth Ride Free Promotional Pass, which began on September 1, 2021, has been very popular with Orange County youth, resulting in more than 672,000 boardings as of January 22, 2022. Based on the results to date of the initial promotion, OCTA is considering the continuation of the free youth fare. Continuing with a Youth Ride Free fare would run beyond a six-month promotional period; therefore, the Federal Transportation Administration (FTA) and OCTA policy require public outreach and a public hearing prior to Board of Directors' consideration.

A public involvement program for continuing the Youth Ride Free Fare Policy started on January 13, 2022. The outreach program was designed following Title VI Public Involvement Plan guidelines and adapted to overcome the challenges of physical gatherings due to the coronavirus (COVID-19).

To gather feedback on the proposal, a comprehensive outreach program was implemented. Public comments are being gathered from a multilingual comment form which was available online, a virtual community meeting on January 31, 2022, through the Customer Information Center, and a public hearing.

The Majority of Responses Supported Extending the Youth Ride Free Program

As of January 31, 2022, a total of 581 public comments have been received. Of the public comments received to date, 96 percent of the comments were supportive of continuing with the Youth Ride Free fare.

Categorized Open-Ended Comments	Number of Comments	Percentage of Comments
Supportive Comments		
General Support	230	39.6%
Academic Success	202	34.8%
Financial Benefit	162	27.9%
Quality of Life Improvement	63	10.8%
Attracting New Riders	21	3.6%
Program Expansion Comments	18	3.1%
Other Comments	17	2.9%
Transit as a Safer Option	16	2.8%
Supportive Comments Total	557	95.9%
Neutral / Unrelated Comments		
Program Modification Request	6	1.0%
Unrelated Comments	5	0.9%
Other Comments	4	0.7%
Neutral / Unrelated Comments Total	15	2.6%
Unsupportive Comments		
Financial Concern	6	1.0%
Generally Opposed	4	0.7%
Negative Experience	1	0.2%
Unsupportive Comments Total	9	1.5%
Grand Total	581	100.0%

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Public Feedback from Virtual Community Meeting

A total of 33 attendees attended a virtual community meeting on January 31, 2022, to ask questions and provide comments about the proposed continuation of the program. The meeting was conducted in English, Spanish and Vietnamese.

The majority of the feedback received was supportive of extending the program, with most attendees asking to “keep and extend the program,” and saying that it was “great help” for youth and students, with “youth taking the bus more often and having better and faster access to school, jobs, and events,” and “a great help for parents who have been impacted financially by the pandemic.”

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Public Hearing for the Addition
of the Youth Ride Free Pass
to the Orange County
Transportation Authority's
Fare Policy

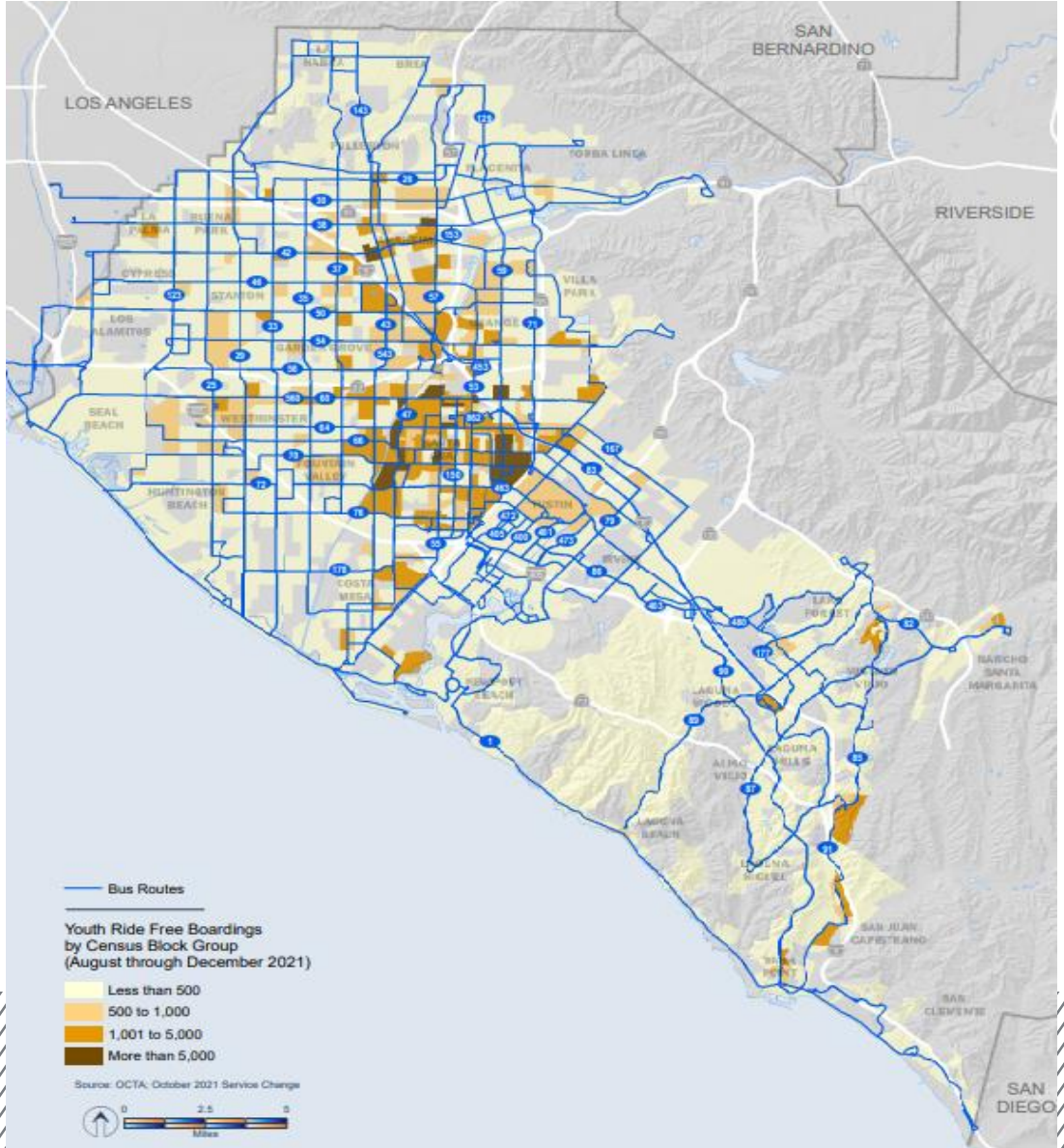
Promotional Pass

- Orange County Transportation Authority (OCTA) has been offering a six-month promotional “Youth Ride Free” pass
- Promotional period from September 1, 2021 through February 28, 2022
- Youth ages six to 18 are eligible
 - Ages 5 and under ride free under current fare policy
- Funded using Low Carbon Transit Operations Program (LCTOP) from the State Cap and Trade Fund

Promotional Pass Ridership

- Total boardings through January 22, 2022, exceed 672,000
- Unique participants through January total 18,200
- Primary trip purpose is school trips
- High school-age youth represent ~ 70 percent of boardings
- Middle, elementary school and other represent ~ 30 percent of boardings

Ridership Distribution



Continuation of Youth Ride Free Pass

- Federal Transit Administration guidelines restrict the duration of promotional fares to six months
- In order to continue the Youth Ride Free pass beyond February 28th OCTA must modify its Fare Policy to include the pass
- Staff has evaluated the impacts of modifying OCTA's Fare Policy to add the Youth Ride Free pass

Impacts and Mitigations

- Estimated annual decrease in fixed-route fare revenue of \$2.2 million based on estimated 1.7 million boardings per year
 - Continued use of LCTOP funds to backfill the loss in fare revenue
- Free Fare for paratransit youth riders
 - Loss of paratransit fare revenue is ~ \$23,000 per year
 - Estimated annual cost increase is less than \$300,000
- Title VI analysis on the fare change demonstrates no disparate or disproportionate impact on minority or low-income riders

Public Outreach Efforts

- Public Notification and Involvement
 - January 9, 2022 – English Publication
 - January 14, 2022- Spanish and Vietnamese Publications
 - January 31, 2022 – Virtual Community Meeting
 - February 14, 2022 – Public Hearing
- As of January 31, 2022, over 581 public comments received
 - 96 percent of the comments are supportive
 - Three percent of the comments are neutral
 - Two percent of the comments are unsupportive
- Virtual Community Meeting held on January 31, 2022
 - Total of 33 attendees with most feedback received being supportive

Staff Recommendations

- Approve the addition of the Youth Ride Free Pass to OCTA's Fare Policy
 - Youth ages six to 18 would be eligible for the pass
- Direct staff to pursue LCTOP or other external funds to support the Youth Ride Free Pass

Next Steps

- OCTA to continue the outreach efforts to the riders and schools
 - Provide passes, request forms, instructions, and information to share
- Utilize established partnerships with schools
 - Distribute parent request forms to students
 - Collect and store completed forms
 - Distribute passes directly to schools
- Provide Youth Ride Free Pass updates to the OCTA Board of Directors on an annual basis

Introduction

The Orange County Transportation Authority (OCTA) is responsible for providing coordinated, effective, and accountable transportation planning and public transportation services within Orange County. Since its formation in 1991, OCTA has kept residents and commuters moving throughout the 34 cities and unincorporated areas of Orange County.

In July 2021, the Board authorized expansion of the Fiscal Year 2019-20 Low Carbon Transit Operations Program (LCTOP) “13 and Under Ride Free” program to include youth aged 14-18 years of age. The promotional six months program, running from September 2021 through February 2022, is consistent with Federal Transit Administration (FTA) Title VI guidelines for the maximum length of a promotional or temporary fare adjustment. The Youth Freedom Pass program is proposed on an ongoing basis to continue to provide free rides for 18 and under riders.

As part of the process of implementing fare changes, OCTA is required to comply with FTA Title VI guidelines by completing a fare equity analysis to determine if the proposed Youth Ride Free Pass program results in disparate or disproportionate adverse impacts on minority or low-income riders, respectively.

Title VI Background

As a recipient of financial assistance from the FTA, OCTA is required to act in accordance with Title VI of the Civil Rights Act of 1964, specifically FTA Circular 4702.1B. To comply with the FTA circular, OCTA shall evaluate fare changes at the planning and programming stages to determine whether they have a disparate impact on minority riders or disproportionate burden on low-income riders through a fare equity analysis.

Definition of Title VI Disparate Impact and Disproportionately High Adverse Effects

Per FTA Circular 4702.1B, “a disparate impact refers 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 exist one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the bases of race, color, or national origin.

Circular 4702.1B defines disproportionate burden as “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.”

OCTA’s Service and Fare Change Evaluation Policy (#EO-520.02SERVICE) sets the threshold for finding a disparate impact or disproportionate burden as 10% (i.e., the adverse effects of the proposed fare change impact on minority and low-income populations greater than 10% compared to non-minority and non-low-income).

Title VI Public Engagement and Outreach

Youth Ride Free Extension Public Involvement Program

The six-month Youth Ride Free Promotional Pass, which began on September 1, 2021, has been very popular with Orange County youth, resulting in more than 672,000 boardings as of January 22, 2022. Based on the results to date of the initial promotion, OCTA is considering the continuation of the free youth fare. Continuing with a Youth Ride Free fare would run beyond a six-month promotional period; therefore, the Federal Transportation Administration (FTA) and OCTA policy require public outreach and a public hearing prior to Board of Directors' consideration.

A public involvement program for continuing the Youth Ride Free Fare Policy started on January 13, 2022. The outreach program was designed following Title VI Public Involvement Plan guidelines and adapted to overcome the challenges of physical gatherings due to the coronavirus (COVID-19).

To gather feedback on the proposal, a comprehensive outreach program was implemented. Public comments were gathered from a multilingual comment form which is available online, and a virtual community meeting held on January 31, 2022, through the Customer Information Center, and a public hearing.

The Majority of Responses Supported Extending the Youth Ride Free Program

As of January 31, 2022, a total of 581 public comments have been received. Of the public comments received to date, 96 percent of the comments were supportive of continuing with the Youth Ride Free fare.

Categorized Open-Ended Comments	Number of Comments	Percentage of Comments
Supportive Comments		
General Support	230	39.6%
Academic Success	202	34.8%
Financial Benefit	162	27.9%
Quality of Life Improvement	63	10.8%
Attracting New Riders	21	3.6%
Program Expansion Comments	18	3.1%
Other Comments	17	2.9%
Transit as a Safer Option	16	2.8%
Supportive Comments Total	557	95.9%
Neutral / Unrelated Comments		
Program Modification Request	6	1.0%
Unrelated Comments	5	0.9%
Other Comments	4	0.7%
Neutral / Unrelated Comments Total	15	2.6%
Unsupportive Comments		

Financial Concern	6	1.0%
Generally Opposed	4	0.7%
Negative Experience	1	0.2%
Unsupportive Comments Total	9	1.5%
Grand Total	581	100.0%

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The majority of the feedback received was supportive of extending the program, with most attendees asking to “keep and extend the program,” and saying that it was “great help” for youth and students, with “youth taking the bus more often and having better and faster access to school, jobs, and events,” and “a great help for parents who have been impacted financially by the pandemic.”

Other comments received during the meeting included requests to provide free transit to all riders / reallocate funding, minimize the parental approval process for the pass, and develop bus maps that highlight service to schools along a route.

Fare Equity Technical Analysis

Data Sources

The demographic data used for this analysis was acquired from OCTA’s 2018 On-Board Origin-Destination Survey Program.

The analysis was conducted from February 2018 to June 2018, and targeted bus trips started between 6:00 am and 3:00 pm. The survey was conducted on board and asked for details regarding customer origin and destination, ethnicity, household income, fare type, age group, and other relative factors. Questionnaires were printed double-sided in both English and Spanish.

Of all 15,496 surveys distributed, a total of 14,292 were returned and completed.

OCTA Ridership Demographic Profile

OCTA ridership is 81% minority, comprised mostly of Hispanic or Latino riders, followed by Asian, Black/African American, American Indian/Alaskan Native, and Native Hawaiian/Pacific Islander riders as summarized in Table 1.

Table 1: Minority Status of OCTA Ridership

Ethnicity	Number of Respondents	Percentage of Total
Hispanic or Latino	8,824	62.6%
Asian	1,553	11.0%
Black/African American	713	5.1%
American Indian/Alaskan Native	217	1.5%
Native Hawaiian/Pacific Islander	154	1.1%
Minority Subtotal	11,461	81.3%
White	2,639	18.7%
Total	14,100	100%

Low-income populations are defined as those individuals with an income at or below the “Very Low-Income” threshold of \$34,150 for Orange County per the California Housing and Community Development Department’s State Income Limits for 2016.¹ This threshold most closely aligns with the <\$30,000 category from the 2018 On-Board survey data. As shown in Table 2, 61.2% of OCTA ridership is very low-income.

Table 2: Income of OCTA Ridership

Income	Number of Respondents	Percentage of Total
Less than \$30,000	7,101	61.2%
\$30,000 to \$49,999	2,208	19.0%
\$50,000 to \$64,999	930	8.0%
\$65,000 to \$84,999	556	4.8%
\$85,000 to \$99,999	292	2.5%
\$100,000 and greater	514	4.4%
Total	11,601	100%

Analysis of Potential Adverse Effects

Under a fare decrease, a Title VI impact would be present if the fare decreases disproportionately benefited non-minority and non-low-income riders. The analysis of the 18 and Under Ride Free program assesses whether non-low-income and non-minority riders receive a benefit of 10% or greater than low-income and minority youth.

¹ The Department’s statistics for 2016 were used to match the year of the latest OCTA ridership survey on which the analysis is based.

Based on the on-board survey data, 91.3% of Youth (ages 17 and under) riders are minority and 51.9% are very low-income.² More minority than non-minority riders will benefit from the fare decrease and more low-income than non-low-income riders will benefit from the fare decrease. From an average fare perspective, minority Youth will receive 50.6% of the benefit from the while non-minority youth will receive 49.4% of the benefit. Low-income youth will receive 47.8% of the benefit while non-low-income youth will receive 52.2% of the benefit; however, the difference of 4.4% does not exceed the 10% threshold per OCTA policy. As a result, there is no disparate impact or disproportionate burden as a result of the ongoing Youth Ride Free program.

Table 3: Youth Minority and Low-Income Riders

Survey Information								
Rider Group	Minority	Percent Minority	Non-Minority	Percent Non-Minority	Low-Income	Percent Low-Income	Non-Low-Income	Percent Non-Low Income
Youth	1,089	91.3%	104	8.7%	414	51.9%	384	48.1%
Fare Information								
	Minority		Non-Minority		Low-Income		Non-Low-Income	
All Fare Media	\$(22,122.70)		\$(1,889.75)		\$(8,427.40)		\$(8,339.50)	
Average Fare Decrease per Fare Product for All Fare Products	\$(21.48)		\$(21.00)		\$(21.07)		\$(22.97)	
Percent Decrease	50.6%		49.4%		47.8%		52.2%	
Percent Variance	1.2%				-4.4%			
Disparate Impact or Disproportionate Burden?	No				No			

² The analysis uses two age categories from the on-board survey uses two age categories for Youth – Under 13 and 13 to 17. 18-year-olds will benefit from the temporary fare decrease but are part of the 18-24 category in the survey data. Fare usage by 18-year-olds alone could not be determined from the data so are excluded from the analysis.

MINUTES-AMENDED

Board of Directors' Meeting

Call to Order

The Monday, February 14, 2022, regular meeting of the Orange County Transportation Authority (OCTA) and affiliated agencies was called to order by Chairman Murphy at 9:05 a.m. at the OCTA Headquarters, 550 South Main Street, Board Room – Conference Room 07-08, Orange, California.

Directors Present

Via Teleconference:

Mark A Murphy, Chairman
Gene Hernandez, Vice Chairman
Doug Chaffee
Barbara Delgleize
Katrina Foley
Brian Goodell
Patrick Harper
Michael Hennessey
Steve Jones
Joseph Muller
Tam Nguyen
Vicente Sarmiento
Harry S. Sidhu
Donald P. Wagner
Ryan Chamberlain

Directors Absent:

Lisa A. Bartlett
Andrew Do

Staff Present:

Darrell E. Johnson, Chief Executive Officer
Jennifer L. Bergener, Deputy Chief Executive Officer
Allison Cheshire, Clerk of the Board Specialist, Senior
Dustin Sifford, Employee Rotation Program Participant
James Donich, General Counsel

Invocation

Director Goodell gave the Invocation.

Pledge of Allegiance

Director Harper led the Pledge of Allegiance.

Special Calendar

Orange County Transit District Special Calendar Matters

1. Public Hearing for the Addition of the Youth Ride Free Pass to the Orange County Transportation Authority's Fare Policy

(A verbatim transcript of this public hearing is on file in the Clerk of the Board's office.)

Sam Kaur, Department Manager, Revenue Administration, provided a PowerPoint presentation on this item.

Chairman Murphy opened the public hearing and requested the Clerk of the Board (Clerk) read into the record the noticing done to inform the public and local agencies of today's public hearing.

Chairman Murphy opened the floor for public comments, and the Clerk noted that the COB Department received public comments via email from January 13, 2022, through February 14, 2022, from the following:

Dana Plair	Marina Munoz
Jacqueline Islas	Lorena Lopez
Adrian Arriero	Nirvana Hannah
Matthew Chirinos	Emma W-T
Jimmy K.V.	Helen Estrada Monterroso
Claudia	Johnny Lopez
Antonio Luna	Stephen Psinas
Kaylen Lara	Elliot Masinsin
Jessica Guzman	Angel
Angelica Ortega	Ashley Tapia
Rosa Villalpando	Valeria Aguilar
Katherine Sanabria	Marleni Hernandez
Esther Madrigal	Isabel Morales
Kaon Suh	Ana Luviano

The comments were emailed to the Board of Directors on Friday, February 11, 2022, at 3:39 p.m. and on Monday, February 14, 2022, at 7:56 a.m. and will be retained as part of the record for today's Board meeting.

In addition, real-time comments were received from the following:

Hector Buspa, Jewell Campos, Isabel Ortega, and Angel, from the Santa Ana Youth Ballot.

Helen Estrada, a Santa Ana High School student.

A lengthy discussion ensued between staff and Board members.

Chairman Murphy closed the public hearing.

A motion was made by Director Foley, seconded by Director Sarmiento, and following a roll call vote, declared passed 14-0, to:

- A. Approve the addition of the Youth Ride Free Pass to Orange County Transportation Authority's Fare Policy in order to continue the pass beyond the promotional period.
- B. Direct staff to pursue the use of Low Carbon Transit Operation Program funds to support the Youth Ride Free Pass.

Director Jones was not present to vote on this item.

Orange County Transportation Authority Special Calendar Matters

2. Presentation of Resolutions of Appreciation for Employees of the Year for 2021

Darrell E. Johnson, Chief Executive Officer (CEO), presented the OCTA Resolutions of Appreciation Nos. 2022-003, 2022-004, 2022-005 to Steve Swanson, Coach Operator; Eduardo Ramos, Maintenance; and Bill Habibe, Administration, as Employees of the Year for 2021.

Chairman Murphy congratulated the Employees of the Year.

Consent Calendar (Items 3 through 21)

Orange County Transportation Authority Consent Calendar Matters

3. Approval of Minutes

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to approve the Orange County Transportation Authority and affiliated agencies' regular meeting minutes of January 24, 2022.

4. Ralph M. Brown Act Board of Directors Resolution for Teleconference Meetings

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to adopt Board of Directors Resolution 2022-012.

5. Audit Responsibilities of the Finance and Administration Committee

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to approve the Audit Responsibilities of the Finance and Administration Committee.

6. Fiscal Year 2021-22 Internal Audit Plan, Second Quarter Update

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to receive and file the second quarter update to the Orange County Transportation Authority Internal Audit Department Fiscal Year 2021-22 Internal Audit Plan, as an information item.

7. Physical Access Security, Internal Audit Report No. 21-511

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to direct staff to implement four recommendations provided in Physical Access Security, Internal Audit Report No. 21-511.

8. Resolution of the Orange County Transportation Authority Authorizing Examination of Sales or Transactions and Use Taxes Records

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to adopt Resolution No. 2022-011 authorizing examination of sales or transaction and use taxes records.

9. Approval of Local Transportation Fund Fiscal Year 2022-23 Apportionment Estimates

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to approve the Local Transportation Fund fiscal year 2022-23 apportionment estimates and authorize the Chief Executive Officer to advise all prospective claimants of the amounts of all area apportionments from the Orange County Local Transportation Fund for the following fiscal year.

10. Orange County Transportation Authority Investment and Debt Programs Report - December 2021

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to receive and file as an information item.

11. Second Quarter Fiscal Year 2021-22 Procurement Status Report

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to receive and file as an information item.

12. Coronavirus-Related Leave for 2022

Chairman Murphy noted that on February 7, 2022, the Executive Committee took action to advance this item with direction to staff to monitor efforts at the state level. On February 9, 2022, the governor signed the leave into effect, and OCTA will implement this according to the law

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to:

- A. Approve the 2022 Orange County Transportation Authority Supplemental Paid Sick Leave program of up to 80 hours to provide compensation relief for coronavirus-related absences.
- B. Authorize the Chief Executive Officer, or designee, to administer an Orange County Transportation Authority 2022 Supplemental Paid Sick Leave program for employees, effective January 1, 2022, until September 30, 2022, and allow program extension beyond that date as necessary to accommodate need and with notification to the Board of Directors.

13. 91 Express Lanes Property Insurance Renewal

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to authorize the Chief Executive Officer to negotiate and execute Purchase Order No. A49650, in the amount not-to-exceed \$530,000 to Marsh USA, Inc., to purchase the 91 Express Lanes' property, flood, and earthquake insurance on behalf of the Orange County Transportation Authority for the policy period of March 1, 2022 to March 1, 2023.

14. Orange County Transportation Authority State and Federal Grant Programs - Update and Recommendations

Director Foley pulled this item to request an update on the number of bike racks.

Kia Mortazavi, Executive Director of Planning, stated that the language related to the scope is a federal grant. The City of Santa Ana has asked for pricing on several types of bike racks based on the amount of the federally funded grant.

A lengthy discussion ensued between staff and Committee members.

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to:

- A. Approve an amendment request for one project in the City of Santa Ana.
- B. Authorize staff to make all necessary amendments to the Federal Transportation Improvement Program and execute any required agreements or amendments to facilitate the recommendations above.

15. 2023 Federal Transportation Improvement Program and Financial Plan

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to:

- A. Authorize the submittal of the Federal Transportation Improvement Program project list and financial plan for the fiscal year 2022-23 through fiscal year 2027-28.
- C. Authorize staff to process all necessary amendments to the Federal Transportation Improvement Program to facilitate the programming of projects.
- D. Adopt Resolution No. 2022-001 of the Board of Directors of the Orange County Transportation Authority.

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 13-1, to:

- B. Authorize the use of \$31.5 million in Congestion Mitigation and Air Quality Improvement Program and \$3 million in Surface Transportation Block Grant funds for OC Streetcar operations and the Countywide Signal Synchronization Baseline Project.

Director Wagner voted in opposition on letter B only.

Orange County Transit District Consent Calendar Matters

16. Sole Source Agreement for the Purchase of Trapeze Software Group, Inc. Outbound Notifications Solution

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to authorize the Chief Executive Officer to negotiate and execute Agreement No. C-1-3800 between the Orange County Transportation Authority and Trapeze Software Group, Inc., in the amount of \$91,450, for the sole source purchase and installation of the Trapeze PASS short message service/email outbound notifications solution.

17. Approval to Release Request for Proposals for Transit Training Services

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to:

- A. Approve the proposed evaluation criteria and weightings for Request for Proposals 2-2187 to select a firm to provide transit training services.
- B. Approve the release of Request for Proposals 2-2187 to select a firm to provide transit training services for a three-year initial term, with one, two-year option term.

Orange County Local Transportation Authority Consent Calendar Matters

18. Capital Programs Division - Second Quarter Fiscal Year 2021-22 Capital Action Plan Performance Metrics

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to receive and file as an information item.

19. Adopt Resolution Declaring Surplus Property for the Raymond Avenue Railroad Grade Separation Project and Authorize the Sale of Surplus Land

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to:

- A. Adopt Resolution No. 2022-007 declaring property located at the southwest corner of Raymond Avenue and Valencia Drive, located in the City of Fullerton within the Raymond Avenue Railroad Grade Separation Project, as surplus land pursuant to Government Code Section 54221.

- B. Direct staff to sell the surplus land located within the Raymond Avenue Railroad Grade Separation Project.
- C. Authorize the Chief Executive Officer to execute the necessary documents to complete the sale of the surplus land for the offer price of \$1,300,000.

20. Amendment to Agreement for Additional Design Services for State Route 91 Improvement Project Between Acacia Street and La Palma Avenue

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to authorize the Chief Executive Officer to negotiate and execute Amendment No. 1 to Agreement No. C-0-2073 between the Orange County Transportation Authority and T.Y. Lin International, in the amount of \$1,965,342, for additional design services for the State Route 91 Improvement Project between Acacia Street and La Palma Avenue. This will increase the maximum cumulative obligation of the agreement to a total contract value of \$10,674,950.

21. Consultant Selection for the Preparation of Plans, Specifications, and Estimates for the State Route 55 Improvement Project Between Interstate 5 and State Route 91

A motion was made by Vice Chairman Hernandez, seconded by Director Goodell, and following a roll call vote, declared passed 14-0, to:

- A. Approve the selection of HDR Engineering, Inc. as the firm to prepare the plans, specifications, and estimates for the State Route 55 Improvement Project between Interstate 5 and State Route 91.
- B. Authorize the Chief Executive Officer to negotiate and execute Agreement No. C-1-3643 between the Orange County Transportation Authority and HDR Engineering, Inc., to prepare the plans, specifications, and estimates for the State Route 55 Improvement Project between Interstate 5 and State Route 91.

Regular Calendar

Orange County Local Transportation Authority Regular Calendar Matters

22. Interstate 405 Improvement Project Update

Jeff Mills and Chris Boucly co-presented a PowerPoint presentation on this item.

No action was taken on this receive and file as an information item.

Discussion Items

23. Public Comments

Real-time public comments were received from the following:

Patrick Kelly, Retired Labor Negotiator for Teamsters 952.

Martin Medrano, representing State Senator Josh Newman's office.

24. Chief Executive Officer's Report

Darrell E. Johnson, CEO, reported on the following:

Labor Negotiations

- The OCTA management team continued negotiations with Teamsters Local 952 on Saturday and mediators from the Public Employment Relations Board, but no resolution was reached.
- OCTA is returning to the table today, and the goal remains to reach a deal that rewards our coach operators, is competitive in the market, and is responsible to taxpayers.
- If an agreement is not reached, the union has stated they intend to strike as soon as 12:01 a.m. tomorrow.
- Considering this, last week, OCTA launched efforts to notify the public about the possibility of a strike, so they can make alternate travel plans if necessary.
- OCTA is doing everything we can to prevent a strike, and staff will let the Board know if there is any significant movement toward a deal after today's negotiations.

25. Directors' Reports

There were no Directors' reports.

26. Closed Session

A Closed Session was held as follows:

- A. Pursuant to Government Code Section 54956.9(d) - Conference with General Counsel - Existing Litigation – Southern California Edison Company v. Orange County Transportation Authority, Case No. SACV 20-02186 United States District Court.
- B. Pursuant to Government Code Section 54956.9(d) - Conference with General Counsel - Existing Litigation – Southern California Gas Company v. Orange County Transportation Authority, Case No. SACV 20-02187 United States District Court.

- C. Pursuant to Government Code 54957.6 to discuss collective bargaining agreement negotiations with Teamsters Local 952 regarding the coach operators. The lead negotiator for the Orange County Transportation Authority is Maggie McJilton, Executive Director, People and Community Engagement, and Teamsters Local 952 representative.

There was no report out on this item.

27. Adjournment

The meeting adjourned at 10:36 a.m.

The next regularly scheduled meeting of this Board will be held at **9:00 a.m. on Monday, February 28, 2022** at the Orange County Transportation Authority Headquarters, Board Room - Conference Room 07-08, 550 South Main Street, Orange, California.

ATTEST:



Gina Ramirez
Clerk of the Board Specialist, Senior

NOTICE OF PUBLIC HEARING

RE: ORANGE COUNTY TRANSPORTATION AUTHORITY'S PROPOSED YOUTH RIDE FREE PASS PROGRAM

NOTICE IS HEREBY GIVEN that the Orange County Transportation Authority (OCTA) Board of Directors will hold a public hearing at the OCTA Headquarters, 550 South Main Street, Board Room – Conference Room 07-08, Orange, California at their regular meeting at 9:00 a.m. on February 14, 2022.

The public hearing shall be for the purpose of considering the Proposed Youth Ride Free Pass Program. A copy of the Proposed Youth Ride Free Pass Program will be available on the OCTA website through the following link: <https://octa.legistar.com/calendar.aspx>.

ALL INTERESTED PARTIES are invited to attend the public hearing to address the Board of Directors with verbal or written comments/recommendations.

Any person with a disability who requires a modification or accommodation to participate in this meeting should contact the OCTA Clerk of the Board, no less than two (2) business days prior to the public hearing to enable OCTA to make reasonable arrangements.

Verbal public comments may be submitted pursuant to the instructions noticed in the meeting agenda, which will be available at least 72 hours prior to the meeting at www.octa.net.

Written comments may be addressed to the Clerk of the Board:

Andrea West
Interim Clerk of the Board
Orange County Transportation Authority
550 South Main Street
P.O. Box 14184
Orange, CA 92868-1584
Telephone (714) 560-5676

or

boardofdirectors@octa.net

AVISO DE AUDIENCIA PÚBLICA

ASUNTO: PROYECTO DE LA AUTORIDAD DE TRANSPORTE DEL CONDADO DE ORANGE DE UN PROGRAMA DE PASES PARA JÓVENES YOUTH RIDE FREE PASS

POR EL PRESENTE SE NOTIFICA que la Junta directiva de la Autoridad de transporte del condado de Orange (OCTA, por sus siglas en inglés) realizará una audiencia pública en la sede de OCTA, sita en 550 South Main Street, Sala de Juntas – Sala de Conferencias 07-08, Orange, California, durante su reunión habitual a las 9:00 a. m. el 14 de febrero de 2022.

La audiencia pública tiene como finalidad considerar el programa propuesto Youth Ride Free Pass. Habrá una copia del programa propuesto Youth Ride Free Pass disponible en el sitio web de OCTA a través del siguiente enlace: <https://octa.legistar.com/calendar.aspx>.

Se invita a **TODAS LAS PARTES INTERESADAS** a asistir a la audiencia pública para presentar a la Junta directiva comentarios/recomendaciones en forma oral o por escrito.

Toda persona con una discapacidad que requiera una modificación o adaptación para participar en esta audiencia pública se debe comunicar con la Secretaria de la Junta de OCTA, por lo menos dos (2) días hábiles antes de la audiencia pública, para que OCTA pueda hacer los arreglos razonables.

Los comentarios públicos orales pueden presentarse según las instrucciones indicadas en la agenda de la audiencia, que estará disponible al menos 72 horas antes de la audiencia en www.octa.net.

Los comentarios por escrito deben enviarse a la Secretaria de la Junta:

Andrea West
Interim Clerk of the Board
Orange County Transportation Authority
550 South Main Street
P.O. Box 14184
Orange, CA 92868-1584
Teléfono (714) 560-5676

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boardofdirectors@octa.net

THÔNG BÁO VỀ PHIÊN ĐIỀU TRẦN CÔNG CỘNG

VỀ VIỆC: ĐỀ NGHỊ CHƯƠNG TRÌNH YOUTH RIDE FREE PASS CỦA ORANGE COUNTY TRANSPORTATION AUTHORITY

XIN THÔNG BÁO Hội Đồng Quản Trị của Orange County Transportation Authority (OCTA, Cơ Quan Quản Lý Giao Thông Vận Tải Quận Cam) sẽ tổ chức một phiên điều trần công cộng tại Trụ sở của OCTA, 550 South Main Street, Phòng họp Hội đồng quản trị –Conference Room 07-08, Orange, California vào buổi họp định kỳ của hội đồng lúc 9 giờ sáng ngày 14 tháng 2 năm 2022.

Phiên điều trần công cộng nhằm mục đích xem xét Đề Nghị Chương Trình Youth Ride Free Pass. Một bản sao của Đề Nghị Chương Trình Youth Ride Free Pass sẽ có sẵn trên trang web của OCTA: <https://octa.legistar.com/calendar.aspx>.

TẤT CẢ CƯ DÂN QUAN TÂM được mời tham gia phiên điều trần công cộng để gửi đến Hội Đồng Quản Trị các nhận xét/đề nghị của mình bằng thư góp ý hoặc phát biểu trong buổi họp.

Bất kỳ người khuyết tật nào cần điều chỉnh hoặc hỗ trợ để tham gia buổi họp này, xin vui lòng liên lạc với Thư ký của Hội Đồng OCTA, trễ nhất là vào hai (2) ngày làm việc trước phiên điều trần công cộng để OCTA có thể chuẩn bị.

Những ý kiến đóng góp bằng lời nói của công chúng có thể được gửi theo hướng dẫn được lưu ý trong chương trình nghị sự của cuộc họp, sẽ có sẵn ít nhất 72 giờ trước cuộc họp tại www.octa.net.

Xin gửi những thư đóng góp ý kiến về địa chỉ của Thư ký của Hội Đồng Quản Trị như sau:

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Orange County Transportation Authority
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Điện thoại (714) 560-5676

hoặc

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