



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

FAIRFAX COUNTY TITLE VI PROGRAM

CHAPTER 1: INTRODUCTION2

1.1 TITLE VI OF THE CIVIL RIGHTS ACT OF 1964..... 2

1.2 DESCRIPTION OF SERVICE 3

1.3 FCDOT TITLE VI DIVISION UPDATES 3

CHAPTER 2: REQUIREMENTS AND GUIDELINES5

2.1 TITLE VI PUBLIC NOTICE 5

2.2 TITLE VI COMPLAINT PROCEDURES AND FORM..... 7

2.3 SERVICE AREA PROFILE 12

2.4 MINORITY REPRESENTATION ON RELEVANT NON-ELECTED COMMISSIONS, COMMITTEES, AND BOARDS.....22

2.5 SUMMARY OF TITLE VI COMPLAINTS, INVESTIGATIONS, AND LAWSUITS 25

2.6 LAND ACQUISITION FOR PURPOSES OF FACILITY CONSTRUCTION 25

2.7 SUB-RECIPIENTS OF FEDERAL TRANSIT ADMINISTRATION FUNDING..... 25

2.8 PUBLIC PARTICIPATION PLAN..... 25

2.9 LANGUAGE ACCESS PLAN..... 33

CHAPTER 3: SERVICE STANDARDS AND POLICIES.....61

3.1 TRANSIT SERVICE STANDARDS 61

3.2 TRANSIT SERVICE POLICIES..... 62

3.3 TRANSIT SERVICE MONITORING 63

3.4 MAJOR SERVICE CHANGE, DISPARATE IMPACT, AND DISPROPORTIONATE BURDEN POLICIES..... 65

3.5 MAJOR SERVICE CHANGES IMPLEMENTED FROM FY 2018 TO FY 2020..... 76

3.6 MAJOR FARE CHANGES IMPLEMENTED FROM FY 2018 TO FY 2020..... 80

3.7 ANALYSIS OF TRANSIT SERVICE STANDARDS 80

3.8 ANALYSIS OF TRANSIT SERVICE POLICIES 85

APPENDIX A: FAIRFAX COUNTY TITLE VI ACCOMPLISHMENTS QUESTIONNAIRE 91

APPENDIX B: MAPS OF LINGUISTICALLY ISOLATED POPULATIONS IN FAIRFAX COUNTY BY LANGUAGE..... 97

APPENDIX C: PRESENTATION: DISPARATE IMPACT, DISPROPORTIONATE BURDEN, AND MAJOR SERVICE CHANGE PROPOSED POLICIES 110

APPENDIX D: MAJOR SERVICE CHANGE, DISPARATE IMPACT, AND DISPROPORTIONATE BURDEN POLICIES – PUBLIC COMMENTS RECEIVED 123

APPENDIX E: FCDOT TITLE VI ONLINE SURVEY RESULTS OVERVIEW..... 131

CHAPTER 1: INTRODUCTION

1.1 Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 prohibits discrimination against an individual or group, intentional or unintentional, on the basis of race, color, and national origin in any program or activity receiving federal financial assistance. The County of Fairfax, Virginia, through the Department of Transportation (FCDOT), is a direct recipient of Federal Transit Administration (FTA) grant funds to support transit-related activities. Since the County receives these grant funds, it is required to conform to Title VI of the Civil Rights Act of 1964 and its amendments, as stipulated by FTA. The FTA Office of Civil Rights monitors FCDOT's Fairfax Connector (Connector) and Title VI programs and ensures their continued compliance.

Title VI requirements for Fairfax County are delineated in FTA's Title VI Circular 4702.1B, *Title VI Requirements for Federal Transit Administration Recipients*. FTA's circular provides guidance to grantees on how to comply with Title VI regulations, as well as ensures grantees provide meaningful language access to persons with Limited English Proficiency (LEP). The circular provides specific compliance information for each type of grantee and provides comprehensive appendices, including additional guidance and examples to ensure recipients understand the requirements.

The FTA Title VI Circular 4702.1B also includes requirements that address Presidential Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority and Low-Income Populations," and integrates requirements found in Presidential Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency," which addresses services to LEP individuals.

Fairfax County works to ensure that its transit services are provided in a nondiscriminatory manner and the opportunity for full and fair participation is offered to riders and others in the community. The County also meets the needs for services and materials for persons with limited English-speaking ability. As part of the County's provision of Title VI assurances that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of the County's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of the Title VI of the Civil Rights Act of 1964 and Executive Order 13116.

1.2 Description of Service

Fairfax County is located in the Commonwealth of Virginia. It is Virginia's most populous county with an estimated population of 1,143,528 in 2019, according to Weldon Cooper Center for Public Service at the University of Virginia. Fairfax County provides transit service through Fairfax Connector, a locally owned and controlled fixed-route bus transit system operated by a third-party contractor. Since its inception in 1985, the Connector system has grown significantly and now has the third largest bus fleet in the Washington, D.C. region and largest public bus fleet in Virginia¹. As of 2019, the Fairfax Connector system consists of 91 routes that provide over 789, 172.5 revenue hours annually, representing an estimated 65 percent of the total bus service in the County.

In addition to Fairfax Connector services, the Washington Metropolitan Area Transit Authority (WMATA) provides approximately 35 percent of the total bus service revenue hours in the County through Metrobus. Metrobus service is regionally focused, providing service across jurisdictional lines, while Connector service is non-regional in nature and operates largely within the County boundaries. The County initiated Fairfax Connector in September 1985 as a cost-effective alternative to the provision of non-regional fixed-route/fixed-schedule bus service by WMATA and has significantly expanded the system since then.

The County also is served by two rail systems, WMATA's Metrorail and the Virginia Railway Express (VRE) commuter rail. The County is served by four Metrorail lines and 10 stations: the Orange Line along the I-66 corridor (three stations); the Blue Line from the Springfield area (one and a half stations); the Yellow Line (one station) from the Huntington area / Richmond Highway corridor; and the Silver Line (five stations) through Tysons to Reston, with an extension to Washington Dulles International Airport and Loudoun County expected to open in 2021, adding three more stations in Fairfax County. VRE provides service to the County on two lines. The Manassas Line connects three stations in the Burke area to Fairfax Alexandria, and Washington DC, while the Fredericksburg Line connects two stations, in Lorton and Springfield respectively, to those locations.

1.3 FCDOT Title VI Division Updates

The Fairfax County Department of Transportation, in its commitment to Title VI adherence, conducted a survey of departmental staff in April 2020. The goal was to review FCDOT's outreach activities following the 2017 adoption of the Title VI Program by the Fairfax County Board of Supervisors, to identify accomplishments, issues, and to determine where or if any improvements could be made in terms of Title VI Program implementation. Questionnaires were sent to all FCDOT heads of all divisions including Transit Services, Site Analysis and Transportation Planning, Capital Projects and Traffic Engineering, Transportation Design, and Special Projects (including the Silver Line). The questionnaire is included as *Appendix A*.

¹ National Transit Database, 2018 Data

The responses to the questionnaire demonstrate FCDOT's ongoing commitment to promoting inclusiveness. For example, meeting planners routinely consulted the language map prior to public meetings to determine if interpreters would be needed. They also contacted relevant Supervisor offices and the Department of Neighborhood and Community Services (NCS) staff to seek information or gain awareness of any special language requirements or groups that would potentially need to be addressed. Language assistance and Americans with Disabilities Act (ADA) statements are always included when announcing public events through various media including newspaper, web advertisements, and mailings.

No major issues or corrective actions were identified following this questionnaire. However, through the development of this Title VI program, FCDOT has identified certain methods and areas that can allow better consistency and thus improve outreach efforts. Section 2.8 of this program features a public participation plan which outlines FCDOT's outreach strategies as well as an outcomes evaluation process to review the overall effectiveness of the strategies.

In addition to the questionnaire, the Transit Services Division (TSD) Service Planning Section undertook two route optimization studies that looked at travel demand and trip patterns in Fairfax County. These studies looked at how the existing Fairfax Connector transit network could be restructured to better align with identified travel patterns and demand, particularly from Title VI communities. As part of this effort, an on-board survey gathered travel and socio-economic information from Fairfax Connector riders, including low income and minority populations. This data provided inputs to the route optimization travel demand analysis. The Reston-Herndon Route Optimization study was undertaken to determine how existing Fairfax Connector bus services in the northwest area of the county would need to be adjusted in response to the planned extension of Metrorail's Silver Line to Dulles Airport and Loudoun County. The Franconia – Springfield Route Optimization Study evaluated potential changes to the Fairfax Connector bus network in the area centered around the Franconia-Springfield and Van Dorn Metrorail Stations.

The TSD Service Planning Section also undertook an update of portions of the County's Title VI Program. This effort included evaluating the current methodologies used to evaluate Title VI impacts stemming from proposed Fairfax Connector service changes, and any proposed transit fare increases. This evaluation helped determine what, if any changes in methodology are needed with regard to Major Service Change, Disparate Impact, and Disproportionate Burden policies. The product of this planning effort is included in Section 3.4 of this Title VI Program.

CHAPTER 2: REQUIREMENTS AND GUIDELINES

2.1 Title VI Public Notice

The following language has been and will continue to be used to notify the public of their rights under Title VI:

Notifying the Public of Rights under Title VI
Fairfax County Department of Transportation and Fairfax Connector

The Fairfax County Department of Transportation and Fairfax Connector operate programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Fairfax County Office of Human Rights and Equity Programs within 180 days of the date of the alleged discrimination. The Office of Human Rights and Equity Programs is located at 12000 Government Center Parkway, Fairfax, Virginia 22035. This office can also be reached by calling 703-324-2953, TTY 711, or Fax: 703-324-3570.

For more information on the Fairfax County Department of Transportation and Fairfax Connector civil rights program and the procedures to file a complaint, please contact: 703-339-7200 (703-339-1608 TTY), email fairfaxconnector@fairfaxcounty.gov; or visit the department's administrative office at 4050 Legato Road, 4th Floor, Fairfax, Virginia 22033. Information on the procedures to file a complaint or to file a complaint contact: 703-324-2953 (TTY 711) or <http://www.fairfaxcounty.gov/ohrep/epd/>. Complaints can be mailed to: Fairfax County Office of Human Rights and Equity Programs, 12000 Government Center Parkway, Suite 318, Fairfax, Virginia 22035.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, please contact: 703-877-5687

The final line of the notice, informing the public of the availability of language assistance, has been translated, on the notice, into the following languages: Spanish (see *Figure 1* below), Korean, Vietnamese, Chinese, Amharic,² Hindi,³ Arabic, Urdu, Farsi, and Tagalog.

² The U.S. Census simply lists "African languages" for all African languages. However, Amharic speakers, born in Ethiopia, make up the largest African immigrant population in Fairfax County. (U.S Census Bureau, American Community Survey, 2014-2018, five-year estimates)

³ "Other Indic Languages" fell higher in the top ten languages (e.g. Telugu at 8) while Hindi was at 10 with individuals in all cases speaking English "less than very well". For the reason that many speakers of other Indic languages may also speak or have knowledge of Hindi, it was included on this list.

Figure 1: Public Notification of Rights under Title VI (Spanish Version)



Aviso público

Departamento de transporte del Condado de Fairfax y Fairfax Connector

Notificación al público sobre los derechos bajo el Título VI

El Departamento de transporte del Condado de Fairfax y Fairfax Connector dirigen programas y servicios sin importar raza, color ni nacionalidad en conformidad con el Título VI de la Ley de los derechos civiles. Cualquier individuo que considere que ha sido ofendido por alguna práctica ilícita discriminatoria puede presentar una queja bajo el Título VI ante la Oficina de derechos humanos y programas de equidad del Condado de Fairfax en un plazo de 180 días a partir de la fecha de la presunta acción discriminatoria. La Oficina de derechos humanos y programas de equidad se encuentra en 12000 Government Center Parkway, Fairfax, Virginia 22035.

También puede comunicarse a la oficina al 703-324-2953, usuarios de la línea TTY al 711 o por Fax: 703-324-3570. Para mayor información sobre el Departamento de transporte del Condado de Fairfax, el programa de derechos civiles de Fairfax Connector y los procedimientos para presentar una queja, llame al: 703-339-7200 (usuarios de la línea TTY al 703- 339-1608 TTY), envíe un correo electrónico a fairfaxconnector@fairfaxcounty.gov o visite la oficina administrativa del departamento en 4050 Legato Road, 4th Floor, Fairfax, Virginia 22033.

Para mayor información sobre los procedimientos para presentar una queja o para presentar una queja llame al: 703-324-2953 (usuarios de la línea TTY al 711) o <http://www.fairfaxcounty.gov/ohrep/epd/>. Puede enviar su queja por correo a: Fairfax County Office of Human Rights and Equity Programs, 12000 Government Center Parkway, Suite 318, Fairfax, Virginia 22035.

Para presentar una queja directamente ante la Administración federal de tránsito, el demandante puede enviar su queja a Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Si requiere información en otro idioma, por favor llame al: 703-324-2953, usuarios de la línea TTY al 711.

 **Suscríbese hoy PARA RECIBIR NOTICIAS DEL CONDADO DE FAIRFAX**
fairfaxcounty.gov/news/subscribe

 Para solicitar esta información en un formato alternativo, llame al Departamento de transporte, 703-877-5600, usuarios de la línea TTY al 711..

Condado de Fairfax, Virginia 

FCDOT Title VI Notice - Spanish

The languages above were selected based on the fact they 1) constitute the ten most prevalent non-English languages spoken in Fairfax County, and 2) they correlate with the ten highest numbers of individuals who speak English “less than very well.” Together, speakers of the ten languages selected for use on the Notice comprise 80 percent of all the speakers of languages other than English in Fairfax County.

The County’s Title VI Notice references both FCDOT and Fairfax Connector to ensure that it is understood that Title VI applies both to the Fairfax Connector service and to other FCDOT transit-related activities. The notice will be printed in each of the ten languages listed above and posted in the following places:

- FCDOT Administrative Offices at 4050 Legato Road, 4th Floor, Fairfax, Virginia 22033, at the front desk and reception area

- Fairfax Connector Webpage at: <http://www.fairfaxcounty.gov/connector/>
- All Fairfax Connector Stores:
 - Franconia-Springfield Metrorail Station, 6880 Frontier Drive, Springfield, Virginia 22150
 - Herndon-Monroe Park-and-Ride, 12530 Sunrise Valley Drive, Herndon, Virginia 20171
 - Reston Town Center Transit Station, 12051 Bluemont Way, Reston, Virginia 20190
 - Stringfellow Park-and-Ride, 4920 Stringfellow Road, Centreville, Virginia 20120
 - Tysons West*Park Transit Station, 8300 Jones Branch Drive, McLean, Virginia 22102
- All Fairfax Connector buses (English and Spanish only)
- At all Fairfax Connector and transit-related FCDOT public meetings
- Each month, a link to the Title VI Notice on the Fairfax Connector website will be tweeted through Fairfax Connector’s Twitter account: @ffxconnector
- On Fairfax Connector’s Facebook “About” page at: <https://www.facebook.com/fairfaxconnector/info>

2.2 Title VI Complaint Procedures and Form

Fairfax County’s Title VI Complaint Procedures have been posted on Fairfax Connector’s website and are available in Fairfax Connector Stores, park-and ride facilities, on Fairfax Connector buses, at major Fairfax Connector transit hubs, and at FCDOT’s Administrative Offices.

The following text has been produced as part of FCDOT’s Title VI Complaint Procedures:

Title VI of the Civil Rights Act of 1964 prohibits discrimination against an individual or group, intentional or unintentional, on the basis of to race, color, and national origin in any program or activity receiving federal assistance, including Fairfax Connector and Fairfax County Department of Transportation’s transit operations and activities.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Fairfax Connector or Fairfax County Department of Transportation may file a Title VI complaint by completing and submitting the “Fairfax Connector” complaint form available on Fairfax County’s Office of Human Rights and Equity Programs (OHREP) website at the following URL:

<https://www.fairfaxcounty.gov/humanrights/>

The mission of the Office of Human Rights and Equity Programs (OHREP) is to ensure equal opportunity and to promote justice, diversity, and inclusiveness by protecting the civil rights of all in Fairfax County. OHREP receives and investigates complaints alleging

violations of the Fairfax County Human Rights Ordinance and manages the County's Fair Housing Plan. OHREP also administers the County's Equal Employment Enforcement (EEO) program and ensures the County's compliance with all federal, state, and county mandates granting equal access to all County services, programs and employment opportunities.

A complaint form can also be obtained by writing the Office of Human Rights and Equity Programs, Equity Programs Division, 12000 Government Center Parkway, Fairfax, Virginia 22035 or by calling 703-324-2953, TTY 711, Fax: 703-324-3570.

Fairfax County investigates complaints received no more than 180 days after the alleged incident. Fairfax County can only process complaints that provide sufficient information to begin an investigation.

Within 48 hours of receiving a complaint, the Fairfax County Office of Human Rights and Equity Programs staff will contact the complainant and elicit all pertinent information with regard to the alleged discriminatory act(s) from the individual via an intake form. The complainant is required to cooperate with the intake process. Within 48 hours of completing an intake form, OHREP staff will use the information in the form to determine whether or not the complainant may establish a prima facie, or a clear, case of possible discrimination.

If OHREP determines that there is a prima facie case of discrimination, an investigation will be initiated. Investigations may include, but shall not be limited to, on-site visits, interviews of witnesses and collection of documents. The accused party (ies) in the allegation(s) of discrimination will be interviewed and provided an opportunity to rebut the allegations and provide relevant information for investigation. Additionally, witnesses will be interviewed as deemed necessary. After an investigation is initiated all information obtained is confidential. Within seven workdays of the initiation of an investigation all of the investigation documentation for the case must be completed. If additional time is necessary to prepare the documentation requested, the staff responsible for the investigation will request an extension from OHREP leadership.

After the completion of the investigation, a report will be produced, and OHREP staff will submit a final recommendation to the OHREP Executive Director. The OHREP Executive Director will review the investigative file and make a final determination. OHREP will inform the complainant whether the allegations of discrimination were substantiated. Upon completion of the investigation and notification of the parties in the complaint, the file will be closed. All documentation, including audio tapes (if applicable), will be kept in the complaint file.

If OHREP determines that a prima facie case of discrimination has not occurred, no investigation will be initiated. However, OHREP's findings in the matter will be documented in a report. OHREP's findings fall under the purview of the Equity Programs Division and there is no right of appeal.

If probable cause is determined or misconduct by an employee is identified, OHREP will instruct FCDOT to consult with the Fairfax County Department of Human Resources regarding corrective or disciplinary actions. If in the course of the investigation, the investigator has reason to believe that a criminal act or violation of law may have occurred, OHREP will contact the Fairfax County Police Department for appropriate action.

A person may also file a complaint directly with the Federal Transit Administration by filling a complaint with the Office of Civil Rights, Attention; Title VI Coordinator, East Building 5th Floor-TCR, 1200 New Jersey Avenue, SE, Washington DC 20590. Fairfax County uses the form presented below as its current Title VI complaint form for citizens. The form is available on Fairfax County's website in PDF format at:

<http://www.fairfaxcounty.gov/ohrep/epd/>. The form can also be obtained at the following locations:

- Fairfax County Office of Human Rights and Equity Programs, 12000 Government Center Parkway, Fairfax, Virginia 22035
- Fairfax County Department of Transportation Administrative Offices at 4050 Legato Road, 4th Floor, Fairfax, Virginia 22033
- All Fairfax Connector Stores:
 - Franconia-Springfield Metrorail Station, 6880 Frontier Drive, Springfield, Virginia 22150
 - Herndon-Monroe Park-and-Ride, 12530 Sunrise Valley Drive, Herndon, Virginia 20171
 - Reston Town Center Transit Station, 12051 Bluemont Way, Reston, Virginia 20190
 - Stringfellow Park-and-Ride, 4920 Stringfellow Road, Centreville, Virginia 20120
 - Tysons West*Park Transit Station, 8300 Jones Branch Drive, McLean, Virginia 22102

Fairfax County has two complaint procedures providing for prompt resolution of complaints by individuals alleging discrimination prohibited by Federal, State, and local law or policy in the provision of services, activities, programs, or benefits. This complaint form is to be utilized for filing complaints of discrimination on the basis of age, sex, sexual harassment, race, religion, creed, national origin, marital status, color, political affiliation, or veteran's status. An individual wishing to file a complaint based on disability should use the complaint form identified in the Fairfax County Government Complaint Procedure under the Americans with Disabilities Act. You may obtain a copy of the complaint form by contacting staff at the Office of Human Rights and Equity Programs.

To contact the Fairfax County Office of Human Rights and Equity Programs call 703-324-2953, TTY 711 on any Fairfax County workday between the hours of 8:00 a.m. and 4:30 p.m., or email EPDEmailComplaints@FairfaxCounty.gov.

INSTRUCTIONS: Complaints should be filed in writing within 60 workdays (180 calendar days for transit-related complaints) from the day the alleged discriminatory act took place. The term “workday” shall mean any Monday through Friday that is not a county holiday. An investigation will follow the filing of the complaint. This form should be used in conjunction with the Fairfax County Policy and Procedure for Individuals Alleging Discrimination in County Programs and Services.

Person Filing Complaint

Name:

Telephone No.:

E-mail:

Home: _____
 Work: _____
 Mobile: _____
 Best time to call: _____

Address:
 Street: _____
 City: _____ State: _____ Zip Code: _____

Person and Department Alleged to have Discriminated:

Name: _____ Department: _____
 Street: _____
 City: _____ State: _____ Zip Code: _____
 Phone: _____

Basis (es) of Discrimination (check or circle all that apply):

- | | | |
|--|--|--|
| <input type="checkbox"/> Race _____ | <input type="checkbox"/> Veteran’s Status _____ | <input type="checkbox"/> Political Affiliation _____ |
| <input type="checkbox"/> Color _____ | <input type="checkbox"/> Retaliation _____ | <input type="checkbox"/> Age – Date of Birth: _____ |
| <input type="checkbox"/> National Origin _____ | <input type="checkbox"/> Sex or Gender _____ | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Religion _____ | <input type="checkbox"/> Sexual Harassment _____ | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Creed _____ | <input type="checkbox"/> Marital Status _____ | <input type="checkbox"/> Other: _____ |

Date(s) Discrimination Occurred: _____

Summary of Complaint: (attach additional pages if necessary)

Action Requested:

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

Signature of Complainant ____/____/____
Date



This form will be made available in an alternative format upon request. Direct your request to the Equity Programs Division of the Office of Human Rights and Equity Programs, 12000 Government Center Parkway, Suite 318, Fairfax, VA 22035; 703-324-2953, TTY 711 or 703-324-3305 (Fax).

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

2.3 Service Area Profile

Demographic and Service Profile Maps and Charts

The maps in *Figure 2* and *Figure 3* below display the concentration and distribution of minority and low-income populations residing in Fairfax County, along with the location of Fairfax Connector service and Washington Metropolitan Area Transit Authority's (WMATA) Metrobus service. Metrobus generally provides "regional" public transportation service that serves multiple jurisdictions, while Fairfax Connector is focused on primarily providing local public transportation service. Together, Metrobus and Fairfax Connector services cover most of the areas of the County where concentrations of minority and low-income residents reside.

The minority populations in Figures 2 and 3 are calculated from the United States Census Bureau's 2014-2018 American Community Survey (ACS) Five-Year Estimates at the Block Group level, as the total population minus the non-Hispanic white population. Fairfax County's population is 48.7 percent minority (all residents who identify as something other than non-Hispanic white). *Figure 2* depicts Block Groups that fall above the County average and those that fall below the County average. *Figure 3* depicts the percentages by Block Groups of minority populations across Fairfax County.

Figure 2 Minority Populations in Fairfax County (by Block Group)

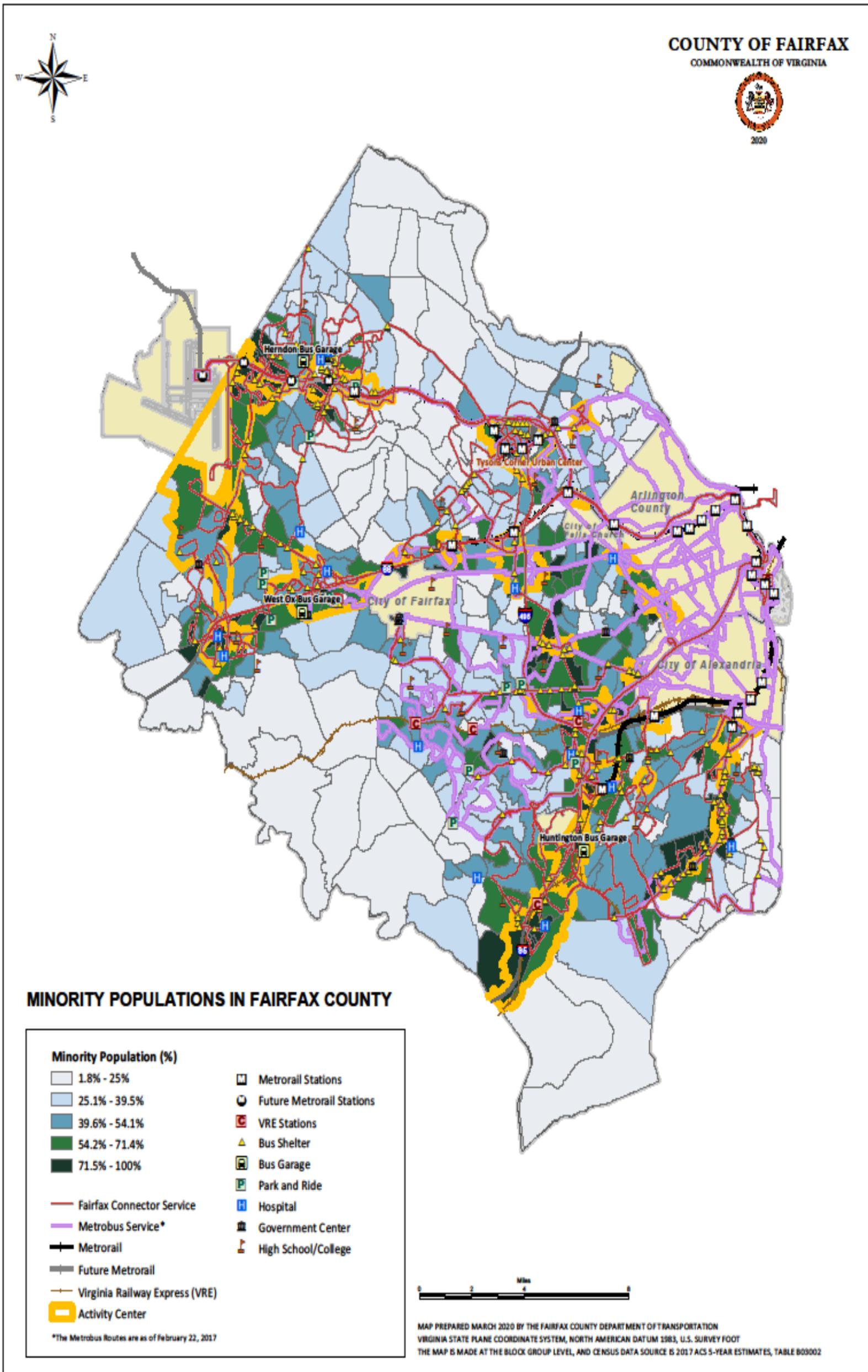
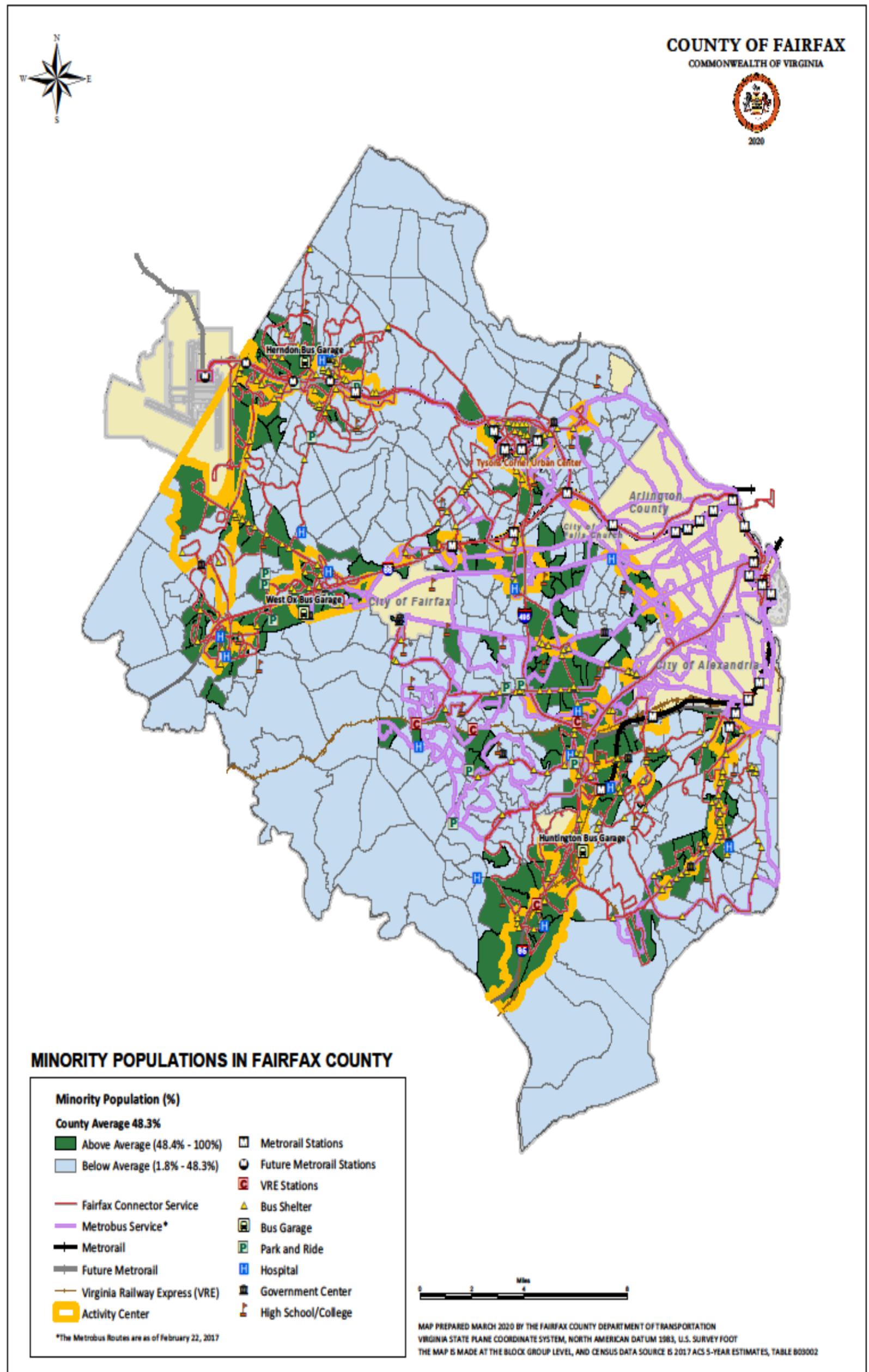
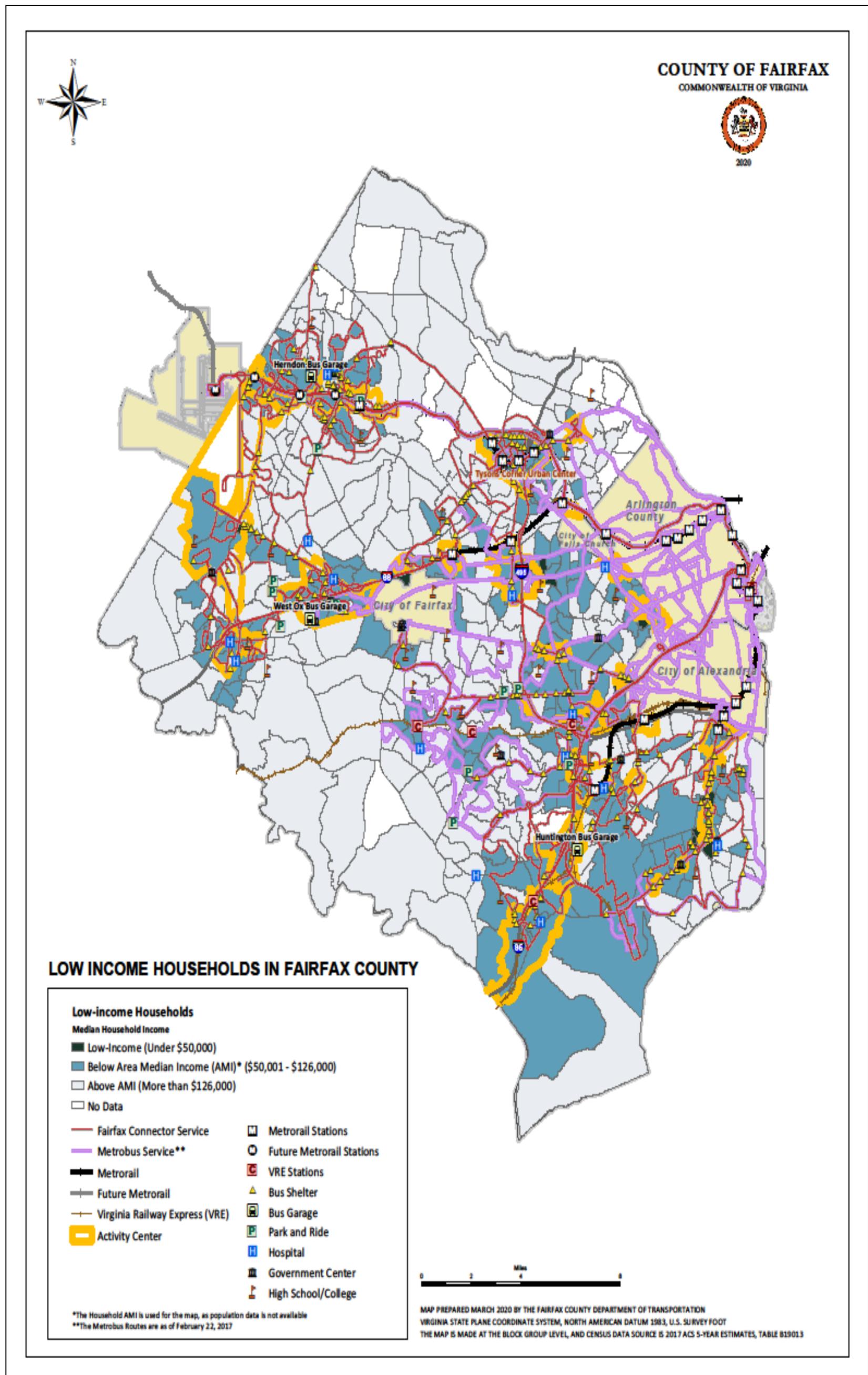


Figure 3 Percent of Minority Populations in Fairfax County (by Block Group)



Similar to the maps above, the map in *Figure 4* displays the concentration and distribution of low-income populations residing in Fairfax County, along with the location of Fairfax Connector service and WMATA's Metrobus service. Fairfax County's Department of Housing and Community Development defines low-income households as households where the total income is less than 50 percent of the Metropolitan Statistical Area (MSA) median household income, adjusted for family size. In keeping with that definition, FCDOT used the Federal Housing and Urban Development (HUD) Fair Market Rents (FMR) income limits to determine the median income for the Washington-Arlington-Alexandria Metro FMR Area, which includes Fairfax County. For 2020, the median income in this area is \$126,000; 50 percent of that income is \$63,000. This number was rounded down to the closest break point in ACS Data Table B19001, to ensure that ACS data could be used to analyze impacts on low-income riders. Therefore, low-income households are defined as households making under \$50,000 or less. Income data was pulled from the 2014-2018 ACS Five-Year Estimates, at the Block Group level. Fairfax County's households are 21.6 percent low-income.

Figure 4 Low-Income Households in Fairfax County (by Block Group)



Demographic Ridership and Travel Patterns

The *FY2016-FY2022 Fairfax County Transit Development Plan*,⁴ completed March 2017, included an on-board customer survey that was administered to a random sample of Fairfax Connector bus riders. The information contained in that Plan informed much of the demographic information contained in the previous Title VI Program (FY 2018 – FY2020).

Similarly, the *Fairfax Connector Origin Destination Survey*, an on-board customer survey administered to a random sample of Fairfax Connector bus riders, was completed in September 2019, and is being used here. The survey was conducted from March 30 - May 24, 2019. Surveys were conducted on a sampling of 25 percent of trips representing one weekday, one Saturday, and one Sunday of travel. Survey results were collected from 3,672 respondents, and the results were weighted to represent actual ridership. *Totals presented in this section may not add to 100 percent, due to rounding, and any numbers in italics total to the net number above them.*

A total of 67 percent of survey respondents identified as minorities (i.e., Black/African American, Hispanic or Latino, Asian, or other) (*Table 1*).

Table 1 Race / Ethnicity of Fairfax Connector Riders

Race / Ethnicity ⁵	Percent of Total Riders
White	33%
Minority	67%
Black / African American	35%
Hispanic	12%
Asian	14%
Native American	1%
Other⁶	5%

The survey was available in English, Spanish, and Korean. 16 percent of all surveys were taken in Spanish and 14 percent of all surveys were taken in Korean (*Table 2*).

Table 2 Survey Questionnaire Administered in English, Spanish, and Korean

Questionnaire Type	Percent of Total Surveys Administered
English	70%
Spanish	16%
Korean	14%

⁴ FY2016-FY2022 Fairfax County Transit Development Plan, available at the following URL: <http://www.fairfaxcounty.gov/fcdot/tdp.htm>. A direct link to the plan can be found here: https://www.fairfaxcounty.gov/transportation/sites/transportation/files/assets/documents/pdf/transportation%20projects,%20studies%20and%20plans/transit_development_plan_fy16-22.pdf

⁵ Multiple responses accepted. For example, a respondent could respond by identifying as both white and Hispanic. The categories listed in Table 1 represent the top mentions from the survey responses.

⁶ Percentages for all other languages were below one percent.

A total of 66 percent, of all Fairfax Connector riders make a household income of \$60,000 or less and are considered low-income (*Table 3*).

Table 3 Fairfax Connector Riders Household Income

Income		Percent of Total Riders
Low-Income		66
	\$10,000 or less	13
	\$10,001 to \$20,000	9
	\$20,001 to \$30,000	12
	\$30,001 to \$40,000	13
	\$40,001 to \$50,000	11
	\$50,001 to \$60,000	8
Not Low-Income		35
	\$60,001 to \$70,000	5
	\$70,001 to \$80,000	5
	\$80,001 to \$100,000	7
	\$100,001 to \$125,000	6
	\$125,001 to \$150,000	5
	More than \$150,000	7

In addition to demographic information above that provides a snapshot of the race/ethnicity and household income of Fairfax Connector riders, it also is important to understand general travel patterns. Private vehicle availability and usage, other modes of travel available (besides Fairfax Connector), reasons for using Fairfax Connector, frequency and purpose of Fairfax Connector use, trip origins and destinations, method of fare payment, number of transfers, and how riders access Fairfax Connector services, help paint a picture of why and how the system is used by riders. From these data, the County is better able to understand the needs of the Title VI community and how well Fairfax Connector meets those needs.

Based on the survey, 59 percent of all riders did not have access to a vehicle to make a trip on the day they were surveyed. Seventy-two percent of low-income riders and 64 percent of minority riders lacked access to a vehicle, respectively (*Table 4*). These figures are reflected in the proportion of Fairfax Connector riders who do not have a usable vehicle available in their household (*Table 5*). Twenty-five percent of riders would use a taxi or Transportation Network Company (TNC) if the Fairfax Connector bus were not available, a more costly trip than the bus (*Table 6*). Low-income riders would be even more likely to use taxis or TNCs in place of the bus, with 35 percent of low-income riders selecting this option.

Table 4 Availability of Usable Vehicle to Make the Trip Today

Availability of Usable Vehicle to Make the Trip Today	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
Yes	38	26	32
No	59	72	64

Table 5 Fairfax Connector Riders Availability of Vehicles

Number of Usable Cars, SUVs, Vans or Trucks in Household	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
None	47	62	51
One	33	28	32
Two	15	7	12
Three or More	3	2	2

Table 6 Use of Other Modes if Fairfax Connector Were Not Available

Alternative Modes if Bus Not Available ⁷	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
Drive	19	11	16
Get A Ride/Carpool	22	27	24
Taxi/TNC	25	35	28
Other Public Transportation	9	4	7
Walk	7	9	7
Bike	1	2	1
Would Not Go at All	6	5	6
Would Go Elsewhere by Bus	4	5	4
Other	1	<1	1

Table 7 displays the main reasons respondents cited for using Fairfax Connector. Among all riders, 40 percent are transit dependent, meaning that they do not have a car or a driver’s license, but among low-income riders this figure rises to 52 percent, while 45 percent of minority riders are transit dependent.

Table 7 Reasons for Using Fairfax Connector

Reasons for Using the Bus	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
Have no alternative – no car	33	43	38
Have no alternative – no driver’s license	7	9	7
Economical	25	27	25
Prefer not to drive	8	5	6
Faster than driving	8	5	7
Parking is unavailable/expensive	5	2	4
Car/ride not available today	6	4	6
Better for environment	1	1	1
Other	4	2	3

Ninety-one percent of survey respondents are frequent Fairfax Connector riders who use the bus at least once a week to make the particular trip during which they were surveyed (Table 8).

⁷ Percentages do not equal 100 percent due to rounding.

Sixty-six percent said they make that particular trip by bus five times per week or more. Low-income riders rely on the bus for their trip six or seven days a week more than the average rider does (25 percent compared to 17 percent).

Table 8 Frequency of Particular Trip by Bus

Frequency of Particular Trip by Bus	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
Net: Weekly	91	93	92
7 days per week	6	9	8
6 days per week	11	14	12
5 days per week	49	42	47
3-4 days per week	17	17	18
1-2 days per week	8	10	8
Net: Less often	6	5	5
1-2 days per month	4	3	3
Less than one day per month	2	2	2
First time making this trip	3	2	2

The on-board survey found that most riders surveyed were traveling from either home or work, 49 percent and 35 percent respectively (*Table 9*). The survey also found that most trip destinations were either home or work, 41 percent, and 38 percent respectively (*Table 10*). Little difference exists between all riders and minority and low-income riders in trip origins or destinations.

Table 9 One-Way Fairfax Connector Trip Origins

Origin	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
Home	49	44	50
Work	35	35	34
Shopping	4	5	4
Social/Recreation/Sightseeing	3	5	3
Personal Business	4	5	4
School	2	3	2
Job-related business	1	1	1
Other	2	2	2

Table 10 One-Way Fairfax Connector Trip Destinations

Destination	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
Home	41	44	40
Work	38	31	39
Shopping	4	5	5
Personal Business	7	8	7
Social/Recreation/Sightseeing	4	5	4
School	2	3	2
Job-related business	2	2	2
Other	1	1	2

About half of the respondents rode at least two buses and/or trains when making their one-way trip (*Table 12*). Fifteen percent took three or more buses and/or train lines on their one-way trip. There was no discernable difference between the number of buses and trains used on a one-way trip between all riders and low-income and minority riders.

Table 11 Number of Buses/Trains Used on One-Way Trip

Number of Buses/Trains Used on One-Way Trip	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
This bus only	49	54	51
Two	36	30	34
Three	12	13	12
Four	2	2	2
Five or more	1	1	1

Eighty-one percent of respondents paid with a SmarTrip® card (without using a Senior or Disabled Fare) while 13 percent used cash (*Table 12*). Use of cash is slightly higher for low-income and minority riders, 18 and 15 percent respectively.

Table 12 Means of Payment for Bus Ride

Means of Payment for Bus Ride	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
SmarTrip® (Non-Senior/Disable Fare)	81	77	79
Cash	13	18	15
Senior/Disabled Fare (SmarTrip® or Cash)	3	2	2
Student Pass/Card	1	1	1
Other	2	2	2

Eighty-seven percent of all riders accessed Fairfax Connector service by walking or using a wheelchair, and ninety percent of riders arrived at their final destinations by walking or using a wheelchair (*Table 13*). Little difference exists between the general rider population and low-

income and minority riders in terms of modes of access and egress from the Fairfax Connector system.

Table 13 Fairfax Connector Mode of Access

Mode of Access	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
Walk or Wheelchair	87	92	89
Drove Self	6	1	4
Driven by Someone Else	4	4	4
Bicycle	1	<1	<1
Taxi or TNC	1	1	1
Other	1	1	1

Table 14 Fairfax Connector Mode of Egress

Mode of Egress	Percent of Total Riders	Percent of Low-Income Riders	Percent of Minority Riders
Walk or Wheelchair	90	93	92
Drive Self	4	1	3
Driven by Someone Else	3	3	3
Bicycle	<1	<1	<1
Taxi or TNC	1	1	1
Other	1	<1	<1

The rider survey results show that Fairfax Connector riders are 67 percent minority and 66 percent low-income. One out of two riders take trips that require at least one transfer, with approximately 73 percent of trips system being related to work commute. Low-income and minority riders are slightly more likely to use cash to pay for their trip than the general rider population. There is virtually no difference in trip patterns and frequency, modes of access and egress, and trip purpose between the general rider population and minority and low-income riders.

2.4 Minority Representation on Relevant Non-Elected Commissions, Committees, and Boards

Fairfax County currently has four non-elected committees, commissions, and boards that provide input on transit service: the Transportation Advisory Commission (TAC), the Commission on Aging (COA), the Fairfax Area Disability Services Board, and the Mobility and Transportation Committee. *Table 15* below displays the current composition of these groups by race/ethnicity.

Table 15 Minority Representation on Relevant Non-Elected Commissions, Committees, and Boards

Body	Race/Ethnicity				
	Caucasian	Latino	African American	Asian American	Native American
Fairfax County Population (2018 Census)	61%	16%	10%	19%	0.2%
Transportation Advisory Commission	100%	0%	0%	0%	0%
Fairfax Area Commission on Aging	92%	0%	8%	0%	0%
Fairfax Area Disability Services Board	92%	0%	0%	8%	0%
Mobility & Transportation Committee (Disability Services and Long-Term Care)	78%	4%	7%	11%	0%
Trails, Sidewalks and Bikeways Committee	99%	1%	0%	0%	0%

The Transportation Advisory Commission (TAC) advises the Fairfax County Board of Supervisors on major transportation issues, including, but not limited to transit service. The TAC meets once a month and provides the Board with information and comments regarding transportation improvements in the County. Meetings are open to the public. The TAC is comprised of 11 members who each serve two-year terms. The TAC includes one member from each magisterial district (9); one at-large; and one Disability Services representative. All members are appointed by the Board of Supervisors. The TAC agenda is posted to its web page prior to every meeting. Minutes from every meeting also are posted on the TAC web page.

FCDOT staff works with the Board of Supervisors to ensure that they are aware of non-Caucasian individuals who may have an interest in serving on the TAC and the importance of having a TAC that is representative of Fairfax County’s diverse population. Staff also works proactively with community-based organizations, Fairfax County departments, including the OHREP and NCS, to identify minority individuals who have an interest in transportation and make the names of those individuals available to the Board for possible appointment to the TAC.

The Fairfax Area Commission on Aging works to increase awareness of problems affecting Fairfax’s aging population and organizes activities to improve the well-being of the County’s senior population. The Commission on Aging includes 12 members who each serve two-year terms. The Commission members include one representative from each magisterial district (9); one at-large representative; one representative from the City of Fairfax; and one representative from the City of Falls Church. The Commission is made up of more than 50 percent older persons, including minority individuals; one senior citizen; a representative of health care provider organizations and supportive services provider organizations; persons with leadership experience in the private and voluntary sectors, a member of the general public; and local elected officials. The Commission meets twice a month and all meetings are open to the public. Meetings are advertised on Fairfax County’s website calendar, on the

Fairfax Area Commission of Aging's County webpage, and in the Golden Gazette, a free monthly newspaper covering news for seniors in the Fairfax area.

The Fairfax Area Disability Services Board provides the Fairfax County government with input, assistance, and advice on the service needs of persons with physical and sensory disabilities. The Fairfax Area Disability Services Board has 15 members who each serve three-year terms. Members can serve for up to three terms. The members of the Fairfax Area Disability Service Board include appointees from each magisterial district (9); one at-large member; two at-large/Fairfax County Business Community representatives; one City of Fairfax local official; one City of Falls Church local official; and one at-large/Fairfax County local official. An alternate may be appointed from each of the cities, for a total of 17.

State Code requires that membership in the local disabilities board include at least 30 percent representation by individuals with physical, visual, or hearing disabilities or their family members; a local official (person elected or appointed to or employed by a board commission or agency from the jurisdiction making the appointment to the disability services board) from each participating jurisdiction; and at least two representatives from the business community. The Board meets once a month and meetings are open to the public. Meetings are advertised on Fairfax County's Disability Services email listserv and on Fairfax County's website calendar. Information about the boards' meetings is also available through a toll-free number.

The Mobility and Transportation Committee aims to create a multi-modal transportation system in Fairfax County that affords personal independence, choice, and full participation by all individuals regardless of age, disability, or economic status in a safe, accessible, affordable, reliable, timely, and sustainable manner. The Committee promotes funding for transit studies, advocates for improved transportation access, and encourages government and community-based organizations to utilize best practices in mobility management. The Mobility and Transportation Committee co-chairs are members the Disability Services Board and the Long-Term Care Coordinating Council, but membership is open to all residents. There is no limit on the number of committee members. Currently, there are 20 committee members comprised of volunteers from the public. Committee members serve for as long as they wish to participate on the committee. Meetings are open to the public and are advertised on Fairfax County's website calendar.

The Trails, Sidewalks, and Bikeways Committee evaluates existing facilities for trails, sidewalks and bicycle routes and assists the county in producing maps of these facilities, and plans new facilities. Committee members also evaluate subdivision plans and site plans for trail facilities. The membership of this committee consists of representatives from the nine magisterial districts, an at-large representative, and representatives from the following organizations: Fairfax County Park Authority; Northern Virginia Regional Park Authority; Clifton Horse Society; Washington Area Bicyclist Association; Northern Virginia Builder's Industry Association; Fairfax Area Disability Services Board; and Fairfax County Federation of Citizens Associations

2.5 Summary of Title VI Complaints, Investigations, and Lawsuits

Fairfax County did not have any Title VI investigations or lawsuits or receive any Title VI complaints involving Fairfax Connector service or other Fairfax County Department of Transportation transit-related activities between 2018 and 2020.

2.6 Land Acquisition for Purposes of Facility Construction

Fairfax County has not constructed any facilities included under FTA Circular 4702.1B, Chapter III, Section 13, including any vehicle storage facilities, maintenance facilities, operations centers, or other similar facilities, which required land acquisition and the displacement of persons from their residences and businesses during the reporting period of 2017-2020.

2.7 Sub-recipients of Federal Transit Administration Funding

Fairfax County does not have any sub-recipients of FTA funds.

2.8 Public Participation Plan

Introduction and Goals

FCDOT strives to provide accessible and relevant public information and involvement opportunities to obtain input on transit service and planning from members of the public. FCDOT's Public Participation Plan (PPP) delineates a set of public participation strategies that facilitate greater involvement by minorities (as defined by race, color, or national origin), Limited English Proficiency (LEP) populations, and low-income populations in the transit planning and decision-making process.

Three goals guide FCDOT's PPP:

- 1) Ensure that minority, LEP, and low-income individuals are provided with *meaningful* and *accessible* opportunities to provide input into Fairfax County's transit decision-making process.
- 2) Build relationships that facilitate open and frequent communication with key stakeholder groups representing and working with minority, LEP, and low-income communities.
- 3) Obtain information and feedback that Fairfax Connector can use to inform the provision of transit service that meets the specific transportation needs of minority, LEP, and low-income populations.

These goals reflect FCDOT's intent to provide relevant information, and opportunities to provide input on all transit projects in a manner that is accessible to Title VI protected and low-income populations throughout Fairfax County. FCDOT continually works to strengthen relationships with minority, LEP, and low-income populations, and relevant community groups

and other stakeholders to create a culture that promotes a high-level of trust and facilitates continuous engagement.

Public Outreach Strategies

FCDOT has continued to refine its public outreach strategies and with the proliferation of digital platforms that provide tools for targeted outreach and enhanced internal and external collaboration efforts with key community stakeholders. FCDOT's communications team is reaching more people than ever before. As part of these efforts, FCDOT has incorporated best practices and federal guidance, including FTA Circular 4703.1, into its outreach planning efforts. These resources along with available outreach platforms and partnerships continue to support and inform the strategies developed for this Public Participation Plan.

FCDOT creates individual public participation plans for each transit planning process or project, tailored to the type of plan or service under consideration and the scope of changes or geographic impact of the project. Strategies identified in this plan will be used *selectively* by FCDOT on a case-by-case basis and incorporated into project-level public participation plans. At the outset of a planning process, service change, fare change, or other transit project, FCDOT's communication staff will review the strategies contained within this plan and select those that are appropriate to the individual project based on the type of project, the demographics of the individuals that would be impacted by the location of the project, and the resources available.

- **Understanding Our Community** – At the outset of any transit project requiring public outreach, FCDOT identifies the local area(s) impacted and develops an understanding of the populations living in the area(s). Demographic data, previous experience, as well as feedback from local community organizations, houses of worship, human services agencies, and staff from the magisterial district office(s) provide both a quantitative and qualitative understanding of the local area(s). Based on this information, FCDOT develops a targeted approach to ensure inclusive public participation by all members of the local community, including identifying the need for translation services and the types of public outreach that are likely to be effective with the populations present in the local community.
- **Inclusive Public Meetings** – FCDOT uses public meetings to generate feedback about proposed service changes and other transit projects. FCDOT aims to notify the public 30 days prior to the meeting through a variety of print and non-print advertising methods. Meetings are held in transit accessible locations and in a variety of location types (e.g., schools, community centers, senior centers, apartment complexes, shopping malls, and libraries). Meetings are also held at locations within walking distance of residential areas when possible. FCDOT meetings are scheduled at traditional and non-traditional times, including during the morning, daytime, and on the weekends. Translation services are made available at all meetings upon request and may be provided without request at meetings in areas with high concentrations of LEP populations and targeted to the language(s) spoken. When appropriate, the format of the meetings will include an open-house style to allow attendees to speak individually and provide verbal feedback to

FCDOT staff. Materials in appropriate languages for locations may also be provided, depending on the impacted populations. FCDOT staff always have access to the County's "Language Line" if special, unforeseen communication needs arise. The Language Line is the County's on-call, on-demand translation service. It can provide translation services in more than 240 languages.

- **Pop-Up Events** – "Pop-Up" events are held at high-traffic places where Fairfax Connector riders and other residents are present in formats that allow for one-on-one interaction. Pop-up events may be held in locations such as transit centers and major transfer points, community centers, schools, senior centers, medical centers, houses of worship, and County-owned and other multifamily residential complexes. Pop-up events are also often employed during large festivals or cultural gatherings. When project resources allow, promotional materials may be provided to increase public participation. At these events, FCDOT may be accompanied by translators and members of local community organizations to facilitate relationship building and communication with the local community. Individuals will have the opportunity to provide oral feedback directly to FCDOT to increase engagement with minority, low-income, and LEP populations.
- **Cross-agency Partnerships** – FCDOT works with other Fairfax County departments, including but not limited to NCS, OHREP, the Office of Public Affairs (OPA), Public Schools (FCPS), Public Works and Environmental Services (DPWES), Park Authority, Housing and Community Development (FCHD), Family Services (DFS), Office to Prevent and End Homelessness (OPEH), Emergency Management (OEM), Health Department (HD), and Police Department (FCPD) to leverage relationships with community and faith-based organizations, supplement translation resources, and at community events to distribute information about Fairfax Connector services and transit projects, plans, and initiatives. FCDOT also works with internal partners on "*train-the-trainer*" programs that familiarize other front-line staff with Fairfax Connector service and current transit projects and plans to allow staff to provide transit information to the general public.
- **Community Events** – FCDOT staff seek to meet people where they are by attending community events and festivals (e.g., Celebrate Fairfax, Pan-American Festival, Reston Multi-Cultural festival) where minority, low-income, and LEP populations may be present to distribute transit information and solicit feedback.
- **Partnerships with Community Based Organizations and Faith Based Institutions** – FCDOT continues to build and nurture relationships with community- and faith-based organizational partners, which is vital for disseminating information and soliciting feedback from diverse communities. FCDOT works with these organizations to distribute materials, co-sponsor meetings, or attend meetings to reach their constituents, clients, and members.

- **Focus Groups** – Focus groups consisting of leaders of relevant community organizations, and/or their members or constituents, are employed at times and locations convenient to attendees to solicit feedback in a small group and informal setting from minority, LEP, and low-income populations.
- **Print Materials Distribution** – FCDOT develops flyers, brochures, and other print materials to inform the public of meetings and other opportunities to comment on projects and to convey vital transit system information. Print materials are distributed to community areas affected by proposed project or service changes and are translated into other languages as needed per the local demographics and the Language Access Plan. Where possible, printed materials incorporate pictures and use minimal text to facilitate their use by LEP and low-literacy individuals. FCDOT utilizes advertisements to promote public meetings and alert riders of service changes on buses and bus shelters, at park-and-ride lots, and at Fairfax Connector Stores. FCDOT also provides notices to other partners for distribution through their channels, including community-based organizations, local human services agencies, and houses of worship.
- **Online Engagement** - FCDOT makes extensive use of online platforms, including its website, social media accounts (e.g., Twitter and Facebook), and subscription-based email/text notifications via Fairfax Alerts to disseminate information about capital projects, service changes, and other important information. FCDOT also develops informative videos and other interactive visualization techniques which are important for reaching LEP and low literacy communities. These videos are produced for large-scale projects, for distribution online, and for use at public meetings.
- **Phone Line** – FCDOT maintains a call center service for transit information that is available 24-hours a day, as well as access to a language line service in the event a caller needs language assistance. The call center phone number is included on all project related materials.
- **Ethnic and Foreign Language Media** – FCDOT advertises public meetings in local ethnic and foreign language media outlets, which may include radio stations, TV stations, and newspapers. These outlets help reach Fairfax County’s diverse populations and by targeting specific minority communities.
- **Advisory Boards, Stakeholder Groups and Technical Advisory Groups** – Fairfax County has five advisory boards that provide advice on transportation-related matters: the Transportation Advisory Commission, the Commission on Aging, the Fairfax Area Disability Services Board, and the Mobility and Transportation Committee, a joint committee of the Fairfax Area Disability Services Board, the Fairfax Area Long Term Care Coordinating Council, and the Trails, Sidewalks, and Bikeways Committee. These advisory boards are comprised of members of the community who can provide information regarding outreach strategies for reaching targeted populations. FCDOT

also establishes and facilitates community stakeholder groups and technical advisory groups for all large-scale transit planning efforts to inform decision making and bring more involvement from entities supporting Title VI protected populations. These groups meet periodically and are established in collaboration with Neighborhood and Community Services and are based on area impacted and populations served.

Outcomes Evaluation Process

The Fairfax County Department of Transportation routinely reviews its Public Participation Plan and the effectiveness of the strategies contained herein. This Public Participation Plan is a living document that FCDOT will refer to and update on an ongoing basis. Since the previous Title VI Program, FCDOT has engaged in a process to develop standard operating procedures for public participation activities, including a public outreach checklist that will help guide departmental staff as they incorporate community input into transportation planning decisions. Once completed, all these procedures will be incorporated in a revised staff handbook for FCDOT employees.

Following the completion of an individual planning process or initiative that includes public involvement, FCDOT reviews the overall effectiveness of the public outreach by addressing the following questions:

- Was there participation by Title VI protected populations throughout this public participation process? What was the level of participation by Title VI protected populations relative to the proportion of the populations that would be potentially impacted by the proposed plan, project, service change, or fare change?
- How many external events, meetings, and opportunities for one-on-one interaction were provided? Did these outreach activities target specific Title VI populations that would be impacted by the proposed transit plan project, service change, or fare change?
- Were materials translated into the appropriate language(s), printed, and distributed at places where minority, LEP, and low-income populations would have access to them?
- In the judgment of the project team, were the appropriate strategies employed to engender inclusive public participation? Which strategies worked the best, and which ones did not work as well as expected?

These questions are addressed by the FCDOT communications team and appropriate project staff and documented following each public participation campaign's conclusion. This performance documentation allows FCDOT staff to continuously improve efforts to promote inclusive public participation.

Project Examples

Service Change Notifications Public Outreach Process

FCDOT conducts outreach to inform and seek input from Fairfax Connector riders about proposed service changes that will impact their routes and communities. Service change outreach efforts are targeted around the geographic areas that are directly impacted by planned service changes, although meetings are advertised throughout the system. Typically,

Fairfax County conducts outreach to impacted riders and communities by posting notices of the planned changes and opportunities for public comment at public meetings on buses, at bus shelters, and by directly distributing print notices of meetings to riders. Information is also posted to Fairfax Connector's website and social media accounts. Translation services are available upon request at all public meetings. Fairfax County translates print notices into Spanish and other languages as needed upon reviewing the demographics of the impacted riders and neighborhoods. By providing information directly to passengers with translation into the appropriate languages, FCDOT seeks to ensure that all riders and impacted community members are aware of and have the opportunity to provide comment on service changes that impact their lives. The following are examples of public outreach strategies related to typical service change notifications and major projects:

Example 1: Fairfax Connector Service Reviews (Route Optimizations) – 2018 - Ongoing

In 2018, FCDOT began a new process of a systemic review of Fairfax Connector bus service with a goal of increased on-time performance, reliability, and improved service for the greatest number of riders as effectively as possible. To date, these route optimization efforts have been initiated in the following areas of Fairfax County: Franconia-Springfield, Reston-Herndon, and Vienna-Tysons along the I-66 corridor (including Chantilly and Centreville). The Huntington area of the County is being reviewed as part of the Richmond Highway Bus Rapid Transit (BRT) project.

One of the key components of these route optimization efforts is public engagement and solicitation of community feedback. For each route optimization effort, two to three rounds of community and stakeholder outreach have been or will be conducted, and the public feedback will be incorporated into the preferred and final service plans for each area. To engage the Title VI populations for these efforts, the following activities have been conducted, among others:

- Flyers informing the public of the process and the various ways to engage and provide feedback were printed in both English and Spanish and were posted on buses and at bus shelters. These flyers were also distributed to a wide network of community groups, HOAs, businesses, and human services agencies serving and advocating for Title VI populations. Geo-targeted online advertisements and community newsletters were also used to promote the various ways of engagement and providing feedback.
- A community stakeholder group was formed for each area and engaged during the two to three rounds of community outreach to provide feedback for each effort. These groups included but were not limited to community organizations, business entities, human services agencies, and transit partners.
- Pop-up events at high foot traffic areas in the impacted areas were conducted and information was provided in English and Spanish. Palm cards with engagement opportunities highlighted were available and distributed. Some of the locations used for these efforts included transit stations, grocery stores, community centers, and human services facilities.
- Multiple public meetings were held in transit accessible locations within the service areas. During the coronavirus pandemic, virtual community meetings were offered and for those with access, a call-in option was provided. Translation services were available in Spanish and Korean at the physical public meetings and the Spanish translation services were used. Additional translation services were made available, per request, but none were requested.
- During the coronavirus pandemic, video presentations were also posted on YouTube and linked on the Fairfax Connector website. These presentations are automatically translated into five languages, namely Spanish / Español, Vietnamese / Tiếng Việt, Korean / 한국어, Chinese / 中文, Urdu / اردو, and Farsi / فارسی by YouTube, and FCDOT has received positive feedback on some of the translations.

- Online surveys were conducted for each public outreach round. The surveys were offered in English and Spanish, and translation of the survey to other languages was provided as an option. Print copies of the survey were also made available.
- Information on the service plan alternatives, the preferred plans, and ultimately the final changes that will go into effect are made available on Fairfax Connector’s website (in English and with the ability to use translation service to other languages); through the Fairfax Connector Telephone information Center (both in English and Spanish); on social media platforms (both Fairfax Connector, FCDOT, and Fairfax County Office of Public Affairs channels); via traditional media outlets (radio, TV, and online, with special emphasis on ethnic media outlets); and through email and text alerts (by subscription).
- Once the service changes go into effect, outreach will be done via all above platforms to individuals, community stakeholders, the business community, and human services agencies.

Example 2: COVID-19 Fairfax Connector Service Modifications – March 2020 - ongoing

For unplanned and significant service modifications (usually during a crisis like severe inclement weather), FCDOT engages in a robust public notification process aimed at reaching all Fairfax Connector passengers as quickly as possible. The most recent example of this involves the impacts of the global coronavirus pandemic (COVID-19) which disrupted much of the regular daily operations of Fairfax County beginning in mid-March 2020.

Upon the eruption of COVID-19 in the National Capital Region, FCDOT executed a pandemic mitigation plan including public notifications of local bus service impacts. While most of the region shut down 90+ percent of public transit, FCDOT maintained approximately 70 percent of the Fairfax Connector service to support customers who are transit dependent. Fares were also suspended on all Fairfax Connector routes. Communication and notification efforts for the COVID-19 service modifications were specifically aimed to reach the underserved and disenfranchised populations: minorities, LEP individuals, persons with disabilities, older adults, and individuals and families living within lower income brackets. As the crisis evolved, the communications also included new safety protocols (social distancing and requirements to wear a face covering) and procedures for boarding and alighting (rear door entry and exit). Examples of some of the notification activities targeting the Title VI populations included but were not limited to:

- Printed materials in the top 10 languages were posted in buses as flyers and car cards with applicable graphics (such as mandatory face coverings, rear door entry/exit, social distancing, free fares). Fairfax Connector staff also was on-hand to provide information at transit stations and other high-traffic locations. These flyers were also distributed to a wide network of community groups, HOAs, businesses, and human services agencies serving and advocating for Title VI populations.
- Text and email alerts to all registered customers were also distributed, and information on the service impacts were posted online with the capability to translate to dozens of languages in real-time.

- FCDOT worked closely with NCS to distribute the information within Title VI populations. FCDOT also used other existing partnerships with multiple Fairfax County agencies and elected leadership to communicate with the hard to reach populations. Some of the agencies providing assistance included the Community Services Board, the Economic Development Authority, OPA, and FCPS.
- Proactive media outreach via direct-to-press messaging was used to develop earned media exposure. Messaging was provided to an extensive list of ethnic media outlets; these outlets generally prefer to receive information in English as they translate it to their respective languages.
- Paid social media advertising was used to provide further reach. The Fairfax Connector/FCDOT customer service telephone line was widely publicized, and the customer service staff's ability to speak multiple languages was highlighted. Use of social media to reach out to geo-targeted areas was one of the most successful methods in reaching large numbers of customers. These ads use visual impact approach and can be very helpful in reaching hard to reach customers via written word. Radio advertising also was used.
- Fairfax Connector information was also distributed, and updates were sent through the Fairfax County Joint Information Center (JIC) as part of the Incident Command System (ICS). Information was also provided via the COVID-19 Hot Line staffed by the Fairfax County Health Department and Office of Emergency Management.

2.9 Language Access Plan

Introduction

Fairfax County Department of Transportation (FCDOT) Language Access Plan (LAP) helps determine what types of language assistance to provide, how Limited English Proficiency (LEP) persons will be informed about the availability of language assistance, processes for evaluating and updating the plan, and the types of training provided to all FCDOT transit employees and contractors to ensure awareness of the importance of timely and reasonable language assistance.

FCDOT's LAP was prepared in compliance with FTA Circular 4702.1B and other federal regulations and guidance related to language assistance. This plan includes:

- The results of the *Four Factor Analysis*.
- A detailed set of strategies that FCDOT will employ to provide language assistance services by language.
- A description of how FCDOT will notify LEP persons about the availability of language assistance.

The LAP also describes how FCDOT monitors, evaluates, and updates the plan. FCDOT staff who are responsible for Title VI compliance are also responsible for all LAP related tasks, including:

- 1) ensuring that all staff are trained on how to provide timely and reasonable language assistance to LEP populations;
- 2) ongoing monitoring of the implementation of the language assistance strategies and materials that comprise the LAP;
- 3) evaluating the efficacy of the strategies and materials; and
- 4) updating the plan as needed.

Four Factor Analysis

The U.S. Department of Justice (DOJ) developed the Four Factor Analysis to provide a clear framework through which recipients of federal funding can determine the extent of their obligation to provide LEP services. Recipients of federal funding are required to take reasonable actions to ensure access to their programs and activities, and the Four Factor Analysis helps to develop an individualized determination of the extent of the needs of LEP populations and how they are best and feasibly served.

FTA's Title VI Circular 4702.1B, instructs FTA funding recipients to use the Four Factor Analysis and refers to DOJ's LEP guidance, as needed. In accordance with these guidelines, FDCOT conducted a Four Factor Analysis to help ensure meaningful access to programs and activities, and to determine the specific language services that are appropriate to provide. Broadly speaking, this analysis helps to determine how well Fairfax County communicates with the LEP communities it serves and how it can communicate with them in the future through language access planning. The Four Factor Analysis examines the following, as described in FTA Circular 4702.1B:

Factor 1: The number or proportion of Limited English Proficiency persons eligible to be served or likely to be encountered by the recipient. This population is program specific. In addition to the number or proportion of LEP persons served, the analysis, at a minimum, identifies:

- How LEP persons interact with the recipient's agency;
- LEP communities and assesses the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
- The literacy skills of LEP populations in their native languages to determine whether translation of documents will be effective; and
- Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which Limited English Proficiency persons come into contact with the program. Recipients should survey key program areas and assess major points of contact with the public, such as:

- Use of bus and rail service;

- Purchase of passes and tickets through vending machines, outlets, websites, and over the phone;
- Participation in public meetings;
- Customer service interactions;
- Ridership surveys; and
- Operator surveys.

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

The provision of public transportation is a vital service, especially for people without access to personal vehicles. For example, a county’s regional planning activities potentially impact every person within the county. Development of a coordinated plan to meet the specific transportation needs of seniors and people with disabilities also will often meet the needs of LEP persons. An LEP individual may have a disability that prevents him/her from using fixed route service, thus making him/her eligible for ADA complementary paratransit. Transit providers, States, and MPOs must assess their programs, activities and services to ensure they are providing meaningful access to LEP persons. Facilitated meetings with LEP persons are one method to inform the recipient on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance.

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

Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Table 16 Four Factor Analysis Methodology

Factor	Measure	Data Source
<p>Factor 1: The number or proportions of LEP persons eligible to be served or likely to be encountered by the program or recipient.</p>	<ul style="list-style-type: none"> • Presence of limited English proficient populations in the Fairfax County • Use of public transportation services by limited English proficient populations in Fairfax County 	<ul style="list-style-type: none"> • American Community Survey (ACS) Estimates: This analysis uses 2014-2018, 5-year estimates. • Fairfax County Public Schools Home Language Survey (HLS): The HLS is distributed every year to all registered students to identify language minority students, parents, and/or guardians.

Factor	Measure	Data Source
Factor 2: The frequency with which LEP persons come into contact with the program.	<ul style="list-style-type: none"> • Frequency with which LEP persons use Fairfax Connector 	<ul style="list-style-type: none"> • Interviews with County Staff • Fairfax Connector Bus Rider Survey: FCDOT surveyed riders on all Fairfax Connector bus routes from March 30 - May 24, 2019.
Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.	<ul style="list-style-type: none"> • Qualitative research on the role of Fairfax Connector service in the lives of LEP persons in Fairfax County • Ability to make trip if Fairfax Connector were not available • Access to a vehicle for LEP Fairfax Connector riders • Trip purpose for LEP Fairfax Connector riders 	<ul style="list-style-type: none"> • Interviews with County Staff • Fairfax Connector Bus Rider Survey: FCDOT surveyed riders on all Fairfax Connector bus routes from March 30 - May 24, 2019.
Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.	<ul style="list-style-type: none"> • Description of existing Language Access Resources and associated costs 	<ul style="list-style-type: none"> • Program information and data. Records on the description of existing language access resources and their costs are maintained by the FCDOT Civil Rights Officer.

Factor 1: The number or proportion of Limited English Proficiency persons eligible to be served or likely to be encountered by the recipient.

U.S. Census Bureau, American Community Survey (ACS)

FTA defines LEP persons as persons for whom English is not their primary language and who have limited ability to read, write, speak, or understand English. Fairfax County residents who reported in the ACS that they speak English “less than very well” are therefore considered to have limited English proficiency in this Four Factor Analysis. Maps displaying the distribution of linguistically isolated populations in Fairfax County overall and for the top ten languages spoken by LEP individuals demonstrate the presence and population density of these populations across the Fairfax Connector service area are found in *Appendix B*.

Table 17 shows the County’s overall LEP population by language group for the population five years and older. In total, 22 percent of the population in Fairfax County, or just over 257,000 people, are limited English proficient.

Table 17 Linguistic Isolation in Fairfax County by Language Group, Population 5 Years and Older⁸

Language Spoken at Home ⁹	Population 5 years and over by Specified Language Group	Percent of Total County Population by Specified Language Group	Speak English “less than very well” by Specified Language Group	Percent of Specified Language Group Speakers that Speaks English Less than “Very Well”
Spanish	150,352	14.0%	61,146	40.7%
Asian or Pacific Island	127,834	11.9%	51,133	40.0%
Indo-European	93,246	8.7%	19,835	21.3%
Other Languages	51,044	4.7%	14,954	29.3%

Details based on the top ten languages spoken by linguistically isolated households in Fairfax County, comparing the results from 2011-2015 (submitted in the 2017 Title VI Program) and the most recent data available for 2014-2018. The top ten languages have not changed in the past three years, however, the size of the limited English proficient populations for the top four languages, Spanish, Korean, Vietnamese, and Chinese have either stagnated, decreased, or, in the case of Spanish, increased only slightly. Growth in LEP populations has occurred in Arabic, African languages, and languages of the Indian Subcontinent. The LEP Arabic speaking population grew by 40 percent in the period examined, from just over 6,100 persons to over 8,590 persons. The presence of LEP persons who speak Farsi doubled.

⁸ U.S. Census Bureau, American Community Survey, 2014-2018, five-year estimates, Table S1601: Language Spoken at Home.

⁹ The US Census Bureau collapses 382 language categories into four major groups: Spanish, Other Indo-European Languages, Asian and Pacific Island Languages, and All Other Languages.

Table 18 Linguistically Isolated Populations in Fairfax County, Population 5 Years and Older – Top 10 Languages

Language	2011-2015 ¹⁰	2014-2018 ¹¹	Percent Change
Spanish or Spanish Creole	60,979	61,146	0.3%
Korean	19,324	17,893	-7.4%
Vietnamese	14,514	12,775	-12.0%
Chinese	9,525	9,112	-4.3%
Hindi and other Indic languages¹²	6,811	8,644	26.9%
African Languages	6,383	8,598	34.7%
Arabic	6,155	6,155	0%
Urdu	5,430	5,685	4.7%
Farsi	4,672	5,430	16.2%
Tagalog	2,982	3,051	2.3%

As shown in *Table 19*, Spanish-speaking LEP persons who work in Fairfax County are far more dependent on Public Transportation as their primary means of transportation to work than the general population; LEP workers who speak languages other than English; and Spanish-speaking LEP persons who also speak English very well. Limited English Proficiency persons who speak Spanish and work in Fairfax County are also more likely to carpool, walk, or use a motorcycle, bicycle, or taxi to travel to work, while they are less likely to work at home vis-à-vis all other populations.

¹⁰ U.S. Census Bureau, American Community Survey, 2011-2015, five-year estimates, Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

¹¹ U.S. Census Bureau, American Community Survey, 2014-2018, five-year estimates, Table B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over

¹²Speakers of other Indic languages may also speak Hindi, so Hindi and other Indic languages will be combined in analyses of linguistically isolated populations in Fairfax County. In the 2014-2018 ACS data there are 7,144 speakers of “other Indic languages” and 1,500 speakers of Hindi that speak English “less than very well.” In the 2011-2015 ACS data there are 4,893 speakers of “other Indic languages” and 1,918 speakers of Hindi that speak English less than very well. Hindi is the 10th largest language group for residents who speak English “less than very well.”

Table 19 Commute Mode Share for Population Working in Fairfax County by Language Spoken at Home and Ability to Speak English¹³

	Total	Speak Only English	Speak Spanish Speak English Very Well	Speak Spanish - Speak English Less Than Very Well	Speak Languages Other Than English - Speak English Very Well	Speak Languages Other Than English - Speak English Less Than Very Well
Drove Alone	77.9%	85.4%	76.6%	62.5%	76.8%	72.2%
Carpooled	7.9%	6.4%	10.2%	16.8%	9.6%	11.4%
Public Transportation	4.4%	4.3%	6.1%	13.5%	1.8%	3.3%
Walked	1.6%	1.4%	1.2%	2.4%	2.0%	3.6%
Taxicab, motorcycle, bicycle, or other means	1.5%	1.3%	2.2%	2.8%	1.4%	2.7%
Worked at Home	6.6%	7.3%	3.6%	2.0%	8.4%	6.8%

Fairfax County Public Schools Home Language Survey

Fairfax County Public Schools conducts an annual Home Language Survey to determine languages students speak at home as well as the preferred language of correspondence with the family. FCPS’ student enrollment for the 2019-2020 school year is 185,033, with 91,451 children speaking a language other than English at home. A total of 188 languages are spoken in students’ homes, with nearly half (49.4%) of all FCPS students living in a home where a language other than English is spoken (*Figure 5*).

¹³ U.S. Census Bureau, American Community Survey, 2014-2018, five-year estimates, Table B08513: Means of Transportation to Work by Language Spoke at Home and Ability to Speak English for Workplace Geography – Universe: Workers 16 years and over

Figure 5 Languages spoken by FCPS students

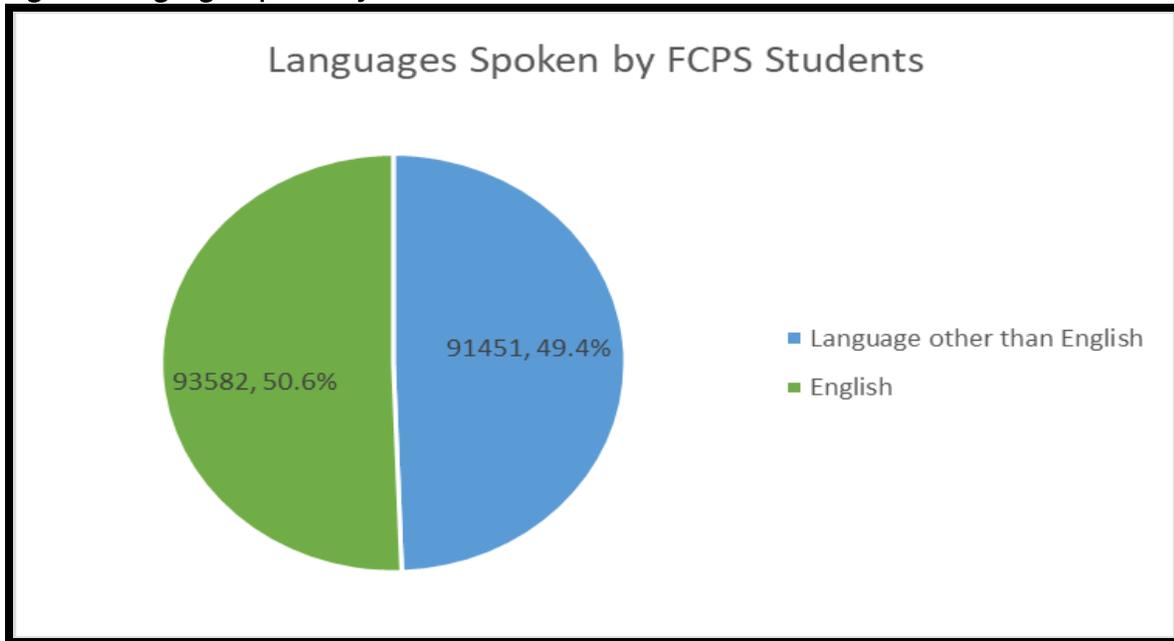


Table 20 shows the most frequently spoken languages at home other than English amongst FCPS students. All students who have parents or guardians that speak a language other than English at home are required to register for school at central intake offices that assess language needs as well as other family social service needs.

Table 20 Languages Other than English Frequently Spoken at Home, 2019-2020 School Year

Rank	Language	Number of Students
1	Spanish	41,156
2	Arabic	6,056
3	Korean	4,721
4	Vietnamese	4,693
5	Chinese/Mandarin	3,942
6	Urdu	3,081
7	Amharic	3,000
8	Telugu	2,273
9	Hindi	1,782
10	Farsi/Persian	1,680
11	Bengali/Bangla	1,235
12	Russian	1,207
13	Tamil	1,157
14	Tagalog/Pilipino	1,098
15	Twi	978

One of the questions asked at school registration is: “In which language would the family like to receive correspondence from FCPS?” This is one indicator of the level of English proficiency of the student’s parents or guardians. Parents identified a total of 69 correspondence languages. Table 21 presents the top 10 non-English correspondence languages for FCPS.

Table 21 Student Household Correspondence Language 2019-2020 School Year

Rank	Correspondence Language	Number
1	Spanish	29,222
2	Korean	1,496
3	Vietnamese	1,427
4	Arabic	1,298
5	Chinese/Mandarin	645
6	Urdu	453
7	Farsi/Persian	257
8	Amharic	200
9	Bengali/Bangla	94
10	Dari	72

Factor 1 Summary

The Factor 1 analysis used two sources of data recommended by FTA to describe the LEP population within the Fairfax Connector service area, U.S. Census Bureau’s American Community Survey and Fairfax County Public Schools Home Language Survey.

A comparison of the ACS data with the FCPS data shows that both sources identify the same top languages spoken by LEP persons in the Fairfax Connector service area. Those languages, which differ in order by the data source,¹⁴ are as follows:

- Spanish
- Korean
- Vietnamese
- Arabic
- Chinese/Mandarin
- Hindi and other Indic languages
- African Languages (Amharic, Twi)
- Farsi
- Urdu
- Tagalog

The top ten languages have remained the same in the past three years, with changes in the size of the limited English proficient populations speaking these languages. The top languages

¹⁴ Spanish is the most popular language spoken other than English according to all data sources reviewed.

(Spanish, Korean, Vietnamese, and Chinese) have seen little change in the population size, while significant growth has occurred in LEP populations in Arabic, African languages, and languages of the Indian subcontinent. As noted above, the LEP population of Arabic speakers has decreased 15 percent, and also with slight decrease in Farsi between the data reported in the 2018 Title VI Program and this Title VI Program. Nearly half (49.4 percent) of all Fairfax County Public Schools students live in a home where a language other than English is spoken, with 188 unique languages spoken in students' homes.

Factor 2: The frequency with which Limited English Proficiency persons come into contact with the program.

Fairfax County as a recipient of federal FTA funds conducts surveys of key program areas and assess major points of contact with the public, such as:

- Use of bus and rail service;
- Purchase of passes and tickets through vending machines, outlets, websites, and over the phone;
- Participation in public meetings;
- Customer service interactions;
- Ridership surveys; and
- Operator surveys.

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

Interviews with County Staff

Fairfax County through the Fairfax Connector transit services provides vital public transportation services, especially for people without access to personal vehicles. LEP persons, for instance, interact with FCDOT by riding the bus, interacting with bus operators, looking online for service information, visiting a Fairfax Connector store, participating in a FCDOT public meeting, or calling FCDOT for service information or to submit a complaint. To understand the frequency with which each of these interactions occurs, as well as the importance of Fairfax Connector service to LEP populations, the methodology for the combined Factors 2 and 3 includes interviews with nine County government Fairfax Connector and social service providers that serve LEP populations across Fairfax County, which were held in early 2020. These interviews focused on where LEP populations reside in Fairfax County, the languages spoken by LEP populations across Fairfax County, and how they use public transportation.

The purpose of the interviews was to understand both how often LEP persons use Fairfax Connector and other public transportation services in Fairfax County and what services and routes they use most frequently (Factor 2), as well as the nature and importance of public transportation service to their lives (Factor 3). *Table 22* lists in chronological order the Fairfax County departments and staff that participated in the interviews.

Table 22 Interviews Conducted

Interview Date	Fairfax County Department or Office	Individual Participants
February 7, 2020	Office of Human Rights and Equity Programs	Ken Saunders, Director; Justine Wharton, Human Rights Specialist Thomas Ajashu, OHREP Outreach Coordinator
February 14, 2020	Neighborhood and Community Services – Region 3	Mrs. LaTishma Walters, Region 3 Manager
February 14, 2020	Neighborhood and Community Services – Region 4	Evan Braff, Region 4 Manager
February 14, 2020	Neighborhood and Community Services – Region 1	Pallas Washington, Region 1 Manager
March 6, 2020	Customer Service, Herndon Division	Devera Ross, Customer Service Manager
March 6, 2020	Fairfax Connector Store	Richard Whaley, Project Manager
March 6, 2020	Customer Service, West Ox Division	William Bell, Customer Service Manager
March 6, 2020	Fairfax Connector Information Center	Edwin Hernandez, Customer Service Manager
March 9, 2020	Customer Service, Huntington Division	Tiffany Holt, Customer Service Manager

Mr. Ken Saunders, Director, Mr. Justin Wharton, Equity Programs Manager, and Ms. Ajashu Thomas, OHREP Outreach Coordinator, Office of Human Rights and Equity Programs

The mission of the Office of Human Rights and Equity Programs is to ensure equal opportunity and to promote justice, diversity, and inclusiveness by protecting the civil rights of all in Fairfax County. OHREP receives and investigates complaints alleging violations of the Fairfax County Human Rights Ordinance, Fairfax Connector Complaints, and manages the County’s Fair Housing Plan. The Office of Human Rights and Equity Programs encounters LEP populations fairly frequently, particularly native speakers of Spanish, Chinese, Vietnamese, and Arabic. In recent years, the number of OHREP encounters with Chinese LEP populations has decreased, while OHREP has experienced an increase in interactions with Amharic and Korean-speaking LEP populations. OHREP has materials translated into all these languages, as well as Amharic and Somali, although Somali is rarely used. Between 20 to 30 percent of the individuals who call OHREP are Spanish speakers.

In OHREP’s experience, LEP populations are located in concentrations across Fairfax County, as follows:

- South County (Lorton, Mt. Vernon, Richmond Highway): Spanish
- Culmore/Route 7: Spanish, Arabic, Amharic
- Herndon: Spanish

- Annandale: Spanish, Korean

OHREP staff identified a number of resources, organizations, special events, and resource centers that Fairfax County can partner with to effectively conduct outreach to LEP populations:

- Fairfax County Neighborhood and Family Resource Centers
- Culmore Family Resource Center
- Springfield Family Resource Center
- Kingsley Commons (frequented by Amharic speakers)
- Vietnamese Festival
- National Korean American Service & Education Consortium (NAKASEC)
- Local Chinese New Year celebrations
- Culmore Partnership – A group of around 20 community organizations in the Route 7 corridor that meets monthly. OHREP has spoken at their monthly meetings in the past and they accommodate outside speakers
- Dar Al-Hijrah Mosque (VA-7) –The mosque has a resource center that connects individuals with public assistance and benefits, and transit service to the mosque has been a concern.
- MakeSpace – A Muslim-American organization focused on youth and young professionals that sponsors educational programs, civic engagement initiatives, community service projects and recreational activities.
- All Dulles Area Muslim Society (ADAMS) Center
- Bailey’s Crossroads Elementary Mother’s Group – A grassroots group that operates a resource center out of a trailer, serving Spanish, Amharic, and Arabic speaking families.
- Asian Community Service Center
- County senior centers and classes
- Celebrate Communication Fair (Deaf Community) – A very large-scale and well attended event
- Northern Virginia Family Service– A community group that serves a diverse community of clients, most of whom live in poverty.

In OHREP’s experience, reaching out to community groups and individual leaders (some cultural groups have an unofficial ‘spokesperson’ that can facilitate contact between the group and the County government agency), and understanding their issues and individual barriers to participation in a public process or communication with public agencies is critical to beginning a relationship. OHREP has three members of their staff that speak Spanish and they hold several events in Latino neighborhoods across the County to maintain a grassroots-level relationship with these communities. OHREP also has one Arabic-speaking staff person. At Chinese New Year’s events OHREP has not brought a translator, as much of the Chinese community is able to speak English. In general, OHREP staff observed that the Asian communities, particularly the Korean and Vietnamese communities, are often self-contained and rely upon their intra-community network for support rather than seeking out assistance from government sources.

OHREP staff recommended having printed materials translated into Spanish and several Asian languages (Chinese, Korean, and Vietnamese), Amharic, and Arabic, by a professional translator. In recent years, OHREP began printing materials regularly in Amharic (for targeted events) and Arabic, due to increased demand for these languages. While the Arabic community is often English-speaking, it is helpful for them to have materials in Arabic. Outreach to the Arabic and Amharic speaking communities in Fairfax County has grown in recent years as these populations have grown. For additional languages, OHREP often has documents translated, but they only print them upon request to reduce costs and respond on an as-needed basis. OHREP staff are often asked about Farsi translated materials, however, to-date the need for Farsi translated printed materials has not been a significant enough to warrant printing these materials except when requested.

OHREP generally does not do media buys, but they have worked with the newspaper El Tiempo Latino and found that to be an effective way of getting information out to the Latino community. OHREP has also done bus shelter advertisement for housing enforcement but found that less effective than was hoped. They also place ads on Fairfax Connector buses.

Ms. LaTishma Walters, Region 3 Manager, Neighborhood and Community Services

The Neighborhood and Community Services promotes the well-being of individuals, families and communities by providing a variety of recreation, educational and developmental programs and services; by facilitating community engagement to identify areas of need and enhance countywide capacity for serving those needs; and by connecting residents with a broad spectrum of county- and community-based resources and services to help them be safe, be healthy and realize their potential.

NCS Region 3 provides coordinated social services planning for the Reston and Herndon areas in north Fairfax County. NCS Region 3 has translators on staff who are fluent in several foreign languages, and they work with a variety of LEP communities in Reston and Herndon. The following language groups are present in Region 3 of Fairfax County:

- Spanish - located throughout the area, including Southgate Apartments (A 250-unit subsidized apartment complex)
- Arabic - Cedar Ridge and Island Walk communities
- Farsi - Stonegate community
- Vietnamese – West Glade Apartments
- Urdu
- Somali - West Glade Apartments
- Chinese – Herndon Senior Center, Fellowship House Hills, Pimmet Hills

In recent years, NCS Region 3 has experienced an increase in Arabic and Farsi-speaking LEP populations, and an overall increase in the size of the LEP population across all groups served.

Many of the LEP individuals in this area of Fairfax County use public transportation, principally Fairfax Connector, as their primary mode of transportation. Ms. Walters emphasized how

important it is for Fairfax Connector to maintain routes to human services centers, as well as public transportation to schools. Limiting the number of transfers, reducing travel times, and more directly linking human services agency locations (since clients often go between sites in a single day) will improve the transportation experience of LEP individuals living in this area of Fairfax County.

The Free Student Bus Pass Pilot Program, which provides free bus passes to middle school and high school students, has benefited the LEP community served by NCS Region 3 since its introduction in 2015. However, the commuter-focused, peak-period nature of Connector service does not always work well for LEP populations, as a higher proportion of LEP individuals work non-traditional schedules. Land uses in the area also constrain the ability of LEP individuals to use Fairfax Connector service, as many bus routes run on major thoroughfares, while the actual homes of LEP individuals may not be walkable from these major roadways. These constraints mean that LEP individuals may be walking long distances, carpooling, or not able to access jobs or services because of their limited transportation options.

While many of these LEP populations lack access to private vehicles, in some instances cultural issues or other considerations inhibit their use of the Connector system. Moreover, a gap in understanding how to ride Fairfax Connector continues to exist, as it is not always intuitive for many LEP persons. Travel training and materials that explain how to use the system in foreign languages would help increase ridership. Ms. Walters requested copies of the translated Fares and Policies rider guides for their office and encourages FCDOT to continue to expand multi-lingual resources and efforts to reach LEP communities.

Ms. Walters staff recommends that FCDOT build relationships with these communities through retail outreach. NCS Region 3 staff often reaches people by going door-to-door and talking with individual families, going to houses of worship, sending flyers home with school children, and reaching these populations in groups or community venues where they have a high degree of trust already established. Some of the LEP populations are wary of strangers and the government and want to stay out of government buildings. Building and maintaining trust with these communities is key to successful long-term engagement. In recent months, NCS Region 3 staff have experienced increased trepidation regarding participating in government events and programs from the area's immigrant population. Historically, NCS Region 3 has engaged LEP communities using the following strategies:

- Working with individual advocates and leaders within these communities to build trust between an institution and a LEP population.
- Face-to-face contact with LEP populations to build relationships.
- Understanding cultures is key; in some cultures (speakers of Arabic, Urdu, and Farsi) it is important to approach the family together, to reach both husband and wife and to meet with families on-site in their residential communities.
- Working with parent liaisons through Fairfax County Public Schools is also an effective way to build a relationship with LEP populations.

The following best practices for use in prompting LEP populations' participation in activities with FCDOT were provided by Ms. Walters:

- Schedule meetings and events with regard to work schedules (e.g., many people work on weekends and evenings but have time during the day).
- Be flexible with the timing of events and hold the same event at several different times of day to accommodate different work schedules.
- Provide food that is culturally sensitive (i.e., conforming with cultural dietary restrictions).
- Provide professionally translated printed material to ensure accuracy.
- Provide incentives and entertainment.
- Work with or hold events at centers that are frequented by LEP populations (in this part of the County this includes organizations such as Cornerstones and Herndon Health Works).
- Work with schools (e.g., parent liaisons, PTAs) to promote and arrange events or activities.
- Meet communities where they are instead of asking them to come to a meeting; many of the individuals in LEP communities are working multiple jobs and have limited time available.

Finally, Mrs. Walters would like their office to be made aware of any of the public outreach or future public participation opportunities to the communities that they serve.

Evan Braff, Region 4 Manager, Neighborhood and Community Services

NCS Region 4 covers a very large, highly suburban area in western Fairfax County (Centreville, Chantilly, Fairfax, Burke, and West Springfield). Pockets of low-income areas are distributed throughout the region, including near Centre Ridge Elementary School, Brookfield Elementary School, and London Towne Elementary School. These schools are classified as Title I schools, where more than 50% of children qualify for free or reduced-price lunches. There are several low-income subsidized multi-family housing complexes that serve many LEP persons who are also low-income and often transit-dependent, and NCS Region 4 works with many of the County and non-profit partners that manage these complexes. The specific neighborhoods, organizations, and complexes they serve or work with include:

- Meadows of Chantilly: 499 mobile homes in Chantilly whose residents are predominately Latino. NCS Region 4 operates many programs in this neighborhood, including English as Second Language classes.
- Three multifamily complexes managed by the non-profit FACETS: Robinson Square (near George Mason University), Ragan Oaks (many Urdu speaking families reside here), and Barrios Circle (Centreville).
- Chantilly Mews: 50 subsidized townhomes located in Chantilly. A computer center at the nearby Ox Hill Baptist Church serves residents of this community.

- Yorkville: A subsidized multi-family housing complex located off Draper Lane in Fairfax. Residents include speakers of Somali, Amharic and other Ethiopian languages, and immigrants from the Middle East. Many of the residents of Yorkville who speak English as a second language are fairly conversant.
- Lamb Center: A non-profit center operated by a religious institution that serves the homeless and low-income individuals living in the Fairfax area. The Lamb Center offers a computer center and other services.
- Western Fairfax Christian Ministries: A religious charity that operates a food bank and a thrift store.
- Centreville Immigration Forum: A local non-profit that assists day laborers and other immigrants with services and community integration, including providing English as a Second Language classes. They operate a day labor center on Route 29 in a shopping center.
- Korean Central Presbyterian Church: Located in Centreville, which has a concentration of recently arrived Korean immigrants and Korean American families, the church has 7,000-8,000 members, including many older, LEP persons who need transportation assistance. The younger, Korean American population are native English speakers.
- Forest Glen: This senior housing facility is located on Route 29 and has many older LEP persons.
- Northern Virginia Family Services: A non-profit that provides anti-hunger programs, housing assistance, and workforce development. Their Multicultural Center offers human services for diverse cultures with multi-ethnic and multilingual staff.

NCS Region 4 uses a “pink card” printed in the top seven languages, other than English, spoken by LEP persons in Fairfax County that provides relevant information on accessing NCS services for LEP persons. The expansion of service to weekend hours has helped LEP and low-income populations access transit every day of the week. Fairfax County has recently implemented *One Fairfax*, an initiative aimed at providing an equity lens to County services. NCS Region 4 sees ways to integrate this concept into transportation access, ensuring that LEP and low-income populations have equal and equitable access to transportation services.

The major issue in NCS Region 4, the Centreville and Chantilly areas, where Fairfax Connector is not a good option for residents in general. Most of the rides take folks into the Vienna Metrorail Station and then out again, which is very ineffective and time consuming. The NCS Region 4 constantly receives feedback from non-speaking English residents that current transportation system does not meet their needs.

Pallas Washington, Regional 1 Manager, Neighborhood and Community Services

The Fairfax County NCS Region 1 is the first-stop social services intake office for the southern part of Fairfax County, serving the U.S. Route 1 Corridor and parts of the Springfield area. The office is located in the Gerry Hyland Government Center on U.S. Route 1. The languages encountered by NCS Region 1 include:

- Spanish

- Urdu
- Twi
- Amharic
- Somali
- Arabic
- Farsi
- Korean
- Vietnamese

The majority of non-native English speakers encountered by NCS Region 1 are Spanish speakers who have a limited ability to speak English. Significant concentrations of Spanish speakers reside throughout the U.S. Route 1 corridor, mostly in the following areas: Springfield (Old Keene Mill Road), Franconia (Franconia Road), central Springfield (near Twain Middle School, Lee High School, and Springfield Mall), West Springfield (along Old Keene Mill near Lynbrook Elementary School, and Crestwood Elementary School), Hybla Valley, Sacramento, Huntington, and along Backlick Road.

A heavy concentration of West African immigrants live along U.S. Route 1 in the Gum Springs area, from Woodley Hills to South Kings Highway and to Groveton. Much of this population speaks Twi as their native language, but also are able to speak English due to learning English as children in their native countries and/or receiving higher levels of education in the United States. NCS Region 1 created a group called the *West African Collaborative* to establish stronger connections with this community. The *West African Collaborative* is comprised of local immigrant community leaders. While many West African immigrants speak English, NCS Region 1 has found that they have a greater trust of and respond better to information that is provided in Twi.

A concentration of South Asian (particularly Urdu speaking) and Middle Eastern (Arabic and Farsi speaking) immigrants reside in the Lorton area. NCS Region 1 has built a relationship with the local South Asian community and they also have collaborated with a local mosque to develop good relationships with the Middle Eastern immigrant populations in the area. Coordinated Services Planning, often the “front door” for human services in Fairfax County, provides documents in Farsi, helping to make County information available to this population. Having information available in Farsi has helped encourage participation by people in this language group, and NCS Region 1 has seen increased participation by Farsi speakers.

NCS Region 1 has found that many people in non-native English-speaking groups prefer to receive information from religious and other community leaders that they trust, rather than from Fairfax County directly. NCS Region 1 employs an Interfaith Liaison who connects faith communities with human services by providing relevant information, conducting trainings, and holding informational sessions.

With regard to public transportation services, NCS Region 1 staff have observed that the riders in South County are primarily African American native English speakers, African immigrants, and Spanish-speaking immigrants. These populations rely on Fairfax Connector and other public transportation services as their primary mode of transportation to commute to work, obtain services, and run errands. Many people visiting the Fairfax County Government Center for WIC, Social Security, Disability, and other public benefits arrive by bus. South Asian and Middle Eastern immigrants tend to travel via private vehicles, often carpooling. NCS Region 1 staff believe that more LEP persons would use Fairfax Connector services if they were more comfortable in English and understood how to ride the bus. Often these populations will not use a service unless it is explained in their language via printed materials or by a trusted leader or advocate in the community. They also recommend using universal symbols as much as possible, as there are many LEP persons who are illiterate in their own languages, particularly among older Spanish speakers.

Ms. Devera Ross, Customer Service Manager, Herndon Division

Ms. Ross is responsible for providing customer service to both bus riders and bus operators who are assigned to the Herndon Division. Ms. Ross handles customer complaints, lost and found requests, and refunds. She communicates with Fairfax Connector customers on a daily basis, including both English-proficient and LEP riders. In preparation for the interview, Ms. Ross reached out to bus operators assigned to the Herndon Division in order to communicate their experiences interacting with LEP riders in addition to her own experiences.

Herndon Division bus operators reported interacting with LEP riders every day in the Herndon/Reston area, specifically on Route 950, which serves Reston Town Center Transit Station, Herndon-Monroe Park & Ride Lot, and Wiehle-Reston East Metrorail Station, as well as on the five RIBS routes, all of which serve Reston Town Center and vicinity. Ms. Ross interacts with LEP customers frequently but not necessarily daily. The language that operators and customer service staff hear the most when interacting with LEP riders is Spanish, followed by languages of the Indian subcontinent (it is unclear which languages) and Arabic. When riders use the customer service department, it is because they have a specific need or question that always results in a direct interaction. Ms. Ross describes her direct interactions with LEP riders as occasional and typically because a rider travels to the division office to look for an item in Lost and Found. When this happens, Ms. Ross will reach out to another staff person on site (often a Spanish speaker) for assistance. Bus operators, on the other hand, report that their interactions with LEP riders is primarily because a rider is asking them for directions or need help navigating the system. When this happens, operators will ask other passengers on the bus for assistance. They report that these interactions occur daily.

Ms. Ross suggested that having schedules printed in other languages besides Spanish would be helpful. She reports that many complaints stem from riders not knowing how to properly read and understand a schedule. She also suggested that having automatic announcements on the bus in languages other than English would be helpful as would posting signs on the buses about fare information in common LEP languages on the bus.

Bus operators report that they see both daily LEP riders, as well as LEP riders, who only use the bus for one or two days per week. The daily riders depend on Fairfax Connector to provide vital services. While it is not possible to know where the daily LEP riders live, they tend to board along Route 950 and the RIBS routes, which are generally around Reston Town Center.

Richard Whaley, Project Manager Fairfax Connector Stores

Paul Tomaszewski, Assistant Project Manager Fairfax Connector Stores

Fairfax Connector Stores now operates six Fairfax Connector stores in Franconia-Springfield, Herndon-Monroe, Reston Town Center, Stringfellow, Tysons-Westpark, Wiehle-Reston East. We effectively serve all routes across Fairfax County. Communication with customers who have low or no English proficiency is a daily issue, primarily being fluent in Spanish with Mandarin Chinese and Korean speakers being a somewhat distant second.

These riders frequently use SmartTrip Card daily to transit to/from workplaces. While ridership tends to be most often on major routes, that is only a matter of scaling- riders with language issues tend to be found spread across all of them. Frequently, riders share a common residence that houses multiple users of mass transit with shared language proficiency. Korean speaking customers tend to cluster in the western part of the county (Centerville, often along Rt.28), while Spanish-speaking ones are more distributed evenly across the entire county or even entering from beyond to use the system (Prince William County is common, Manassas/Woodbridge notably.).

Mr. Whaley would also suggest more multilingual signage, especially near the driver's area of buses. Text translation via a (fixed in place) tablet that can handle multiple languages and in large enough font sizes for visually impaired customers may also help, but literacy is also an issue for some riders. For those riders, access to real-time translation may also be required and would be a more difficult issue to resolve. Occasionally, Fairfax Connector store staff request assistance from nearby bus operators or supervisors who speak languages other than English. Staff also call the customer service center where bilingual Spanish speaking staff are available to help with translations.

Many of the LEP individuals who are seeking information and assistance at a Fairfax Connector Store are frequent customers, indicating that they utilize public transportation services. Anecdotally, Fairfax Connector Store staff have developed some understanding of the role that public transportation plays in the lives of LEP and other non-native English speakers that use their services. Many Latino customers use Fairfax Connector to meet their daily transportation needs, including not just the commute to work, but also for transportation to shopping and other services. They believe that many of the older Asian immigrants may have access to a vehicle or a family member that can drive, but use public transportation as they may not wish to drive for certain errands (i.e., medical appointments, grocery shopping). Many of the South Asian and Middle Eastern immigrants that use the Tysons Corner Connector Store are commuters who may have access to a private vehicle.

Fairfax Connector store staff in general have extensive experience assisting LEP persons from a variety of backgrounds and Connector Store staff provided information on what types of information LEP persons are requesting when they visit Connector Stores. *Table 23* lists the languages frequently encountered at Fairfax Connector stores, as reported by Mr. Whaley per the experience of his staff.

Table 23 Frequently Encountered Language by Fairfax Connector Stores

Fairfax Connector Store	Language Groups
Reston	Spanish, Hindi, Urdu, Farsi, Arabic
Herndon	Spanish, Hindi, Urdu, Farsi, Arabic
Tysons	Spanish, Hindi, Urdu, Farsi, Arabic, Vietnamese, Korean, Chinese
Springfield	Spanish
Stringfellow	Spanish

In general, Fairfax Connector store staff have found that older adults (regardless of language group or country of origin) are the most likely to have a limited ability to speak English among the non-native English-speaking persons served by the store. At all Fairfax Connector stores a need exists for materials in Spanish. While the younger Spanish-speaking population is generally capable of communicating in English and understanding some English language material, the older Spanish-speaking population needs more language assistance services. At the Tysons Corner Connector Store, staff often encounter older adults who are Asian, South Asian, and Middle Eastern immigrants who cannot speak English well.

Fairfax Connector Store staff already make use of rider information available in Spanish. In addition, they believe it would be helpful to have these same materials translated and printed into languages other than Spanish, such as Hindi, Urdu, Farsi, and Arabic. Staff also believe that having better local area maps and visual aids would be useful in communicating with LEP persons. Most of the questions that are asked of Connector Store staff are how to travel to a destination, and the ability to use visual aids to answer the question would allow Fairfax Connector Store staff to communicate with LEP persons from many different language groups. The Fairfax Connector Stores currently display a large map that covers the entire county, but due to the scale of the map, it can be hard to read. Staff would prefer smaller, local area maps that are easier to read.

When asking how to travel somewhere, LEP persons sometimes will provide the name of a destination written in English by another person, provide a general area (e.g., Route 7) that they want to go, but are unable communicate the specific destination or address. Sometimes, LEP persons are looking for assistance in confirming which buses they should take. When a rider does not know where they need to go, the benefit of a trip planner is limited. Staff tends to use WMATA’s Trip Planner to help customers, but this website requires an address or major destination for the trip origin and destination.

Mr. Whaley said that they do not typically see many African immigrants in Fairfax Connector Stores, and he could not speak to their language access needs. He also noted that at a few of the stores they see international tourists, and any language assistance resources provided could serve these individuals as well. In general, most customers are regulars in the stores. Many customers come into the stores to load their SmarTrip cards, where they can pay cash and the balance can be used immediately. In this sense the Connector Stores provide a key critical function in making sure the unbanked and riders who do not have access to computers or the internet have access to SmarTrip cards.

Mr. William Thomas Bell III, Customer Service Manager, West Ox Division

Mr. Bell manages customer service interactions with the riding public and bus operators at the West Ox Division. Like managers at other divisions, he helps bus riders with lost and found requests, customer complaints, and fare concerns. Mr. Bell and his personnel at the West Ox Division communicates regularly with LEP riders. He directly communicates with customers who require translation services approximately two to three times per month; however, bus operators report encountering riders who require language assistance daily. Operators specifically encounter LEP riders along the Franconia-Springfield, Huntington area (Route 310), Chantilly, and along Lee Jackson Highway (Route 50). Main routes for LEP individuals include Route 310, the 650 routes (including 650, 651, and 652) and Route 605. Additional routes include Route 306, the 640 series, Route 642, and Route 644. Routes that experience some, but minimal, LEP usage include the 630s, 620s, 463, and 461.

Riders interacting with the customer service department generally have a specific question or a need that must be addressed. Mr. Bell reports having interactions with LEP riders approximately two to three times per month through the customer service center. Most LEP riders use the call center rather than calling the Division office directly. When he does receive a phone call (particularly in Spanish), Mr. Bell will first ask bilingual staff on-site to provide translation assistance.

Bus operators also report an additional two to three LEP riders along West Ox routes who required help with translation. In each of those cases, the operators had been trained to refer LEP riders to the call center where they would have access to the language line. Operators also have been trained to seek language assistance from other riders on the bus.

Mr. Bell pointed out that FCDOT already has translated some rider information into Spanish (e.g., Car Cards). In his opinion, since Spanish is the primary LEP language in the West Ox Division, FCDOT is doing an excellent job at meeting the needs of the Hispanic community. Spanish is the primary language spoken by LEP individuals. Other non-English speakers include immigrants from India, Ethiopia, and the Middle East. Due to the diversity of our workforce, many of our operators can speak Spanish and occasionally other languages and are able to communicate with passengers when they need assistance. These LEP populations largely rely on public transportation to get around. Mr. Bell knows from experience and from taking customer calls and complaints from all riders that Fairfax Connector provides a vital service to all riders. People use the service for grocery shopping, work, and other daily activities. In his

opinion, riders who live in the Franconia-Springfield, Huntington, Chantilly, and Lee Jackson Highway (Route 50) Corridor have the highest LEP needs.

Mr. Edwin Hernandez, Manager of the Fairfax Connector Telephone Information Center (TIC).

Mr. Hernandez manages the Fairfax Connector Telephone Information Center. Mr. Hernandez assists customers who call the call center requesting bus route information such as next arrival time and trip planning. The TIC also assists customers in filling reports to be sent to Fairfax County offices such as customer complaints, concerns or lost and found reports. Mr. Hernandez and the TIC team communicate with LEP customer daily. Customers call the TIC daily requesting information from all bus divisions: Herndon/Reston, Huntington, and the West Ox division. From his perspective, no one division has more LEP customers than another as customers are calling from all the areas that Fairfax Connector Buses service. Since the TIC handles more Spanish speaking customers than other languages, the call center employs Spanish speaking representatives to assist them with their questions. Other than Spanish speaking customers, the TIC does not receive an appreciable volume of calls from customers speaking languages other than English. That said, Mr. Hernandez would recommend that Fairfax Connector consider translating bus schedules into Chinese as he is noticing that Chinese speaking customers are beginning to use the call center. The TIC's customers are mostly repeat customers whose primary mode of transportation is public transportation. The majority of LEP customers calling are daily riders asking for the next available bus at their waiting location as this is their only form of transportation.

Ms. Tiffany Holt, Customer Service Manager, Huntington Division

Ms. Holt manages customer service interactions with the riding public, supervisors, and bus operators at the Huntington Division. Ms. Holt assists passengers with lost and found requests, customer complaints, fare concerns, and a plethora of issues ranging from new bus stop requests, to customers suggesting entire route modifications. Ms. Holt and her colleagues at the Huntington Division communicate with LEP riders daily. She directly communicates with customers who require translation services approximately two to three times per month; however, bus operators report daily interaction with riders who require language assistance. Operators frequently encounter LEP riders along the Lorton corridor and riders leaving Lorton to travel to Tysons, and along Backlick Road traveling toward Annandale High School, specifically. The routes reported to have the most prevalent population of LEP riders are: Route 171 Richmond Highway; 101 Fort Hunt-Mt. Vernon; 109 Rose Hill; 151/159 Engleside – Mt. Vernon; 152 Groveton – Mt. Vernon; 161/162 Hybla Valley Circulator; 401/402 Backlick – Gallows Road. Customers who are unable to speak English fluently are predominantly Spanish speakers, but as the area continues to develop and the culture diversifies, African, Indian and Middle Eastern customers have also been reported as having language barriers.

When riders contact the customer service department, it generally is because they have a specific question or a need that must be addressed. Ms. Holt reports having personal interactions with LEP riders approximately two to three times per month through the customer service center. When she receives a phone call, Ms. Holt can ask bilingual staff on-site to provide translation assistance, if necessary. In circumstances where the language in question is

less common, operators have been trained to refer LEP riders to the call center where they would have access to the language line, or to ask other riders on the bus to assist with translations. These semi-frequent interactions are often not officially recorded as translation requests.

Although FCDOT has translated some rider information into Spanish, Ms. Holt would recommend that additional translations be done in Arabic, such as fare box instructions, and call card advertisements along the inside of the bus. She believes this would continue to demonstrate FCDOT's efforts in acknowledging and accepting that the growing demographic extends beyond the Hispanic community.

Bus operators serve LEP riders regularly. Through daily interaction and engagement, Ms. Holt understands the vital role that Fairfax Connector plays in the community. People use the service for grocery shopping, work, and other daily activities. In summary, riders who live in the Lorton Corridor and along Richmond Highway/Route 1 tend to have the highest LEP needs, but the demographic continues to expand as the community develops.

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

FCDOT currently provides language access resources in multiple formats, including real-time interpretation, visual aids, and translated documents. FCDOT is committed to providing adequate language assistance resources, based on identified community needs, regardless of cost. Currently, FCDOT budgets up to \$143,000 annually to accomplish the following language access strategies, including, but not limited to the following:

- Access to the Language Line for real-time interpretation
- Printing of the Spanish editions of the Fares, Policies, and General Information brochure
- Provision of professional live interpretation at community outreach events, as needed
- Translation and printing of service information flyers that notify riders of upcoming changes to Fairfax Connector service
- Advertising in local ethnic newspapers and on radio stations (as applicable) in advance of service changes, supplemented with online ads on newspaper sites and targeted Facebook ads
- Participate in or hold three pop-up events and community events or meetings a year to reach LEP populations

In addition to these resources, FCDOT staff who speak languages other than English are identified within the department as being available to provide interpretation services at public outreach events as needed. This list of staff who are available to provide interpretation services is periodically updated through a Foreign Language Resource Survey that is distributed to all full-time staff. The Title VI Notice and the Title VI Complaint Form also are available in Amharic, Arabic, Mandarin Chinese, Farsi, Hindi, Korean, Spanish, Tagalog, Urdu, and Vietnamese.

Fairfax County Procedural Memorandum 02-08 (April 30, 2004) stipulates that each department in the County must have an official Language Access Coordinator. Mr. Benjamin Atsem currently serves as FCDOT's Language Access Coordinator. Procedural Memorandum 02-08 lists the following responsibilities for the Language Access Coordinator:

1. Create a repository of resources and material related to language issues;
2. Develop a database of bilingual staff who are interested in participating in LINCUS, a program providing limited-service telephone interpretation;
3. Work with agencies to educate employees about language resources, accessibility of services and effective use of interpretation and translation services; as well as the available equipment and materials;
4. Work with agencies to ensure effective preparation and review of all translated materials, including the creation and training of Translation Verification Teams (TVTs);
5. Develop standards for translation of materials, including guidelines for documents requiring bidirectional writing formats;
6. Establish a county-wide coding system for all translated material;
7. Develop and distribute standard glossary of county agency names, titles and basic terminologies for use by translation vendors;
8. Work with DIT on the creation of a Language Access Webpage and the usability of existing technology and assist in developing process for upgrades;
9. Update agencies on any advances in software or on-line translation capabilities, as well as typing software available; and
10. Evaluate organization-wide access to LEP information, resources and equipment.

FCDOT's Language Access Coordinator is the Title VI Officer. Procedural Memo 02-08 also stipulates that agency directors are responsible for disseminating the County's Language Access Policy to all employees, and for ensuring that all employees are aware of and have access to language information and available language resources. Each agency is required to assess current LEP service practices (including bilingual direct service capacity) at all levels within the agency and identify appropriate resources (language services, personnel, equipment, training, funding and partnerships) available to support the demand. Agencies must develop protocols to include resource utilization, language vendor selection, and identification of document-types eligible for translation.

Procedural Memo 02-08 also requires that each department provide the necessary resources, within the agency's budget, to support the County's language access policy and initiatives. As additional language access strategies are deemed to be need, FCDOT will allocate budget resources to meet these needs accordingly.

FCDOT will notify LEP persons about the availability of language assistance through advertising the availability of language assistance in bus schedules and public meeting notices and ensuring that translated materials are distributed and available throughout the system.

Monitoring and Evaluation

Per Fairfax County Procedural Memo 02-08, FCDOT, and all other Fairfax County agencies, are responsible for developing a year-end report measuring and monitoring results of Language Access activities. This report must be provided to the county-wide Language Access Coordinator no later than July 31st each year. These reports are required to include a list of all translated materials and costs of all language services for the fiscal year.

To ensure ongoing monitoring and evaluation of the Language Access Plan, FCDOT's Title VI Officer/Language Access Coordinator will include the following information in the annual report, in addition to the list of all translated materials and costs of all language services for the fiscal year:

- Usage of the language line, including volume of calls by language and total costs expended on the language line for transit purposes;
- Number of requests for interpretation, by event type, by language for transit-related events;
- Any input received from FCDOT staff or contractors regarding language assistance needs they encountered at transit-related events;
- Views of the Fairfax Connector webpages with translated materials and the use of Google Translate on the Fairfax Connector website; and
- Any additional language access resources provided for transit service or planning-related needs during the year due to demonstrated need or requests.

In addition to the language access strategies that FCDOT currently pursues, *Table 24* delineates a budget for the Title VI Language Access Strategies that FCDOT will implement annually for this Title VI Program:

Table 24 Language Access Plan Strategies – Budget

Activities	Cost (<i>estimated per fiscal year</i>)	Assumption
<i>Materials and Notices Translations, Interpretation</i>		
Activity 1: Provide highly visual regional sector maps to bus operators/supervisors for use in the field.	Completed	No Additional Costs
Activity 2: Print and distribute Fares and Policies Brochure in the 10 languages identified in LAP.	Translation: \$3,229 Printing: \$3,500	<i>Fares & Policies Brochure (Source: FCDOT)</i> <ul style="list-style-type: none"> • Existing Spanish Translation: \$250 • Translation per language (non-Spanish): \$331 • Printing: \$350 per language
Activity 3: Post Title VI Notice and Complaint forms in Fairfax County DOT offices in the 10 languages identified in LAP	Completed	No Additional Costs
Activity 4: Print and post Title VI Notice bus cards in Spanish for every vehicle in the Fairfax Connector fleet	Completed	No Additional Costs
Activity 5: Service Information Flyers and Online Surveys: FCDOT produces about 25 flyers and 8 surveys each year that will be translated the appropriate languages for the area impacted	Translation: \$20,000 Printing: \$14,000	<i>Service Information Flyer (Source: FCDOT)</i> <ul style="list-style-type: none"> • Translation for Spanish, Chinese, Vietnamese (In-house, FCDOT): \$25/hour • Translation per language (Not Spanish): \$75 • Assumption: 8 surveys translated into Spanish • Assumption: 4 surveys translated into Chinese, Korean, Amharic and Vietnamese • Assumption: 25 flyers translated into Spanish • Assumption: 5 flyers each in Chinese, Korean, Amharic and Vietnamese • FCDOT Internal Formatting/Printing: \$247 per flyer/per language
Activity 6: FCDOT will advertise in traditional local ethnic media (radio, TV, print, as applicable) in advance of service changes (approximately four times per year), along with targeted online and social media ads.	Multi-channel advertising campaigns, 4x/year - \$80,000	<i>Newspaper Print Ad, 4x/year</i> <ul style="list-style-type: none"> • Washington Chinese • Washington Hispanic • Zethiopia (Amharic) • Korea Daily • Doi Nay (Vietnamese) <i>Newspaper Web Ad (4x/year)</i> <ul style="list-style-type: none"> • Washington Chinese <i>Radio (15 or 30 second ad, 4x/year)</i> <ul style="list-style-type: none"> • El Zol (Spanish Language) • 1120 AM (Amharic)

		<ul style="list-style-type: none"> • 1310 AM (Korean) <p><i>Targeted Social Media Ads (4x/year)</i></p> <ul style="list-style-type: none"> • 5 languages
Activity 7: FCDOT sets up a Language Line phone number for 10 languages identified in the LAP.	Estimate: \$5,000	<p><i>Language Line (Source: FCDOT, Fairfax County OHREP, LanguageLine.com)</i></p> <ul style="list-style-type: none"> • Spanish is \$.90/minute, other languages \$1.10/minute. Over 200 languages included • Fairfax County OHREP uses Language Line; each language line call costs \$95-\$177. <p>Language Line offers immediate, over the phone translation services in the following three situations:</p> <ul style="list-style-type: none"> • A LEP individual visits the office in person. The office staffer calls language line. A language line representative answers the phone and connects the staffer and the LEP individual with as live interpreter for the conversation. • A LEP individual calls the office, indicating their native language. The office staffer calls language line to get a live interpreter for the conversation. • A staffer places a call to an LEP person, first calling Language Line to have a live interpreter on hand when the LEP person picks up the phone.
Activity 10: Language Assistance Tear Sheets on Buses (10 languages)	Completed	No Additional Costs
<i>Training and Events</i>		
Activity 1: Pop-Up Events and Community Meetings	8 Events/Year Staffing: \$12,000	<ul style="list-style-type: none"> • Staffing - \$1,200 per event for four contracted event staff (3 hours including set-up and break down) • Staff Planning Time: 30 hours, 4 hours per event per staff member
Activity 3: Title VI FCDOT Staff Training	Title VI Officer	All current staff have received Title VI training. The Title VI Officer will be responsible for ensuring all new FCDOT staff are trained via the new online training module.
<i>Monitoring and Evaluation</i>		
Activity 1: Monthly Data Collection	Title VI Officer	The Title VI Officer will be responsible for all relevant data collection activities for the LAP.
Activity 2: Annual Data Collection	Title VI Officer	The Title VI Officer will be responsible for all relevant data collection activities for the LAP.
Activity 3: Annual LAP Report, Updates to Language Access Plan	Title VI Officer	The Title VI Officer will be responsible for compiling the annual LAP report and incorporating updates to the language access

		plan.
Contingency	\$5,113	The contingency will cover any additional costs incurred over the fiscal year that were not encompassed in this estimate.
<i>Total Estimated Annual Cost</i>		<i>\$142,842</i>

CHAPTER 3: SERVICE STANDARDS AND POLICIES

FCDOT has developed transit service standards and policies to guide the equitable provision of service and amenities in Fairfax County.

3.1 Transit Service Standards

The following service standards will be used for FCDOT’s Title VI service monitoring. The agency will use these metrics to evaluate routes and adjust service based on performance.

Vehicle Load

Vehicle load is the level of passenger crowding that is acceptable for a safe and comfortable ride. Vehicle load is expressed as a ratio of the number of passengers on the vehicle to the number of seats on the vehicle averaged over the peak one-hour in the peak direction. FCDOT uses different vehicle load factors for its commuter and local services. The standard for commuter services is 1.00, representing one passenger per seat, because these services often operate on limited-access highways which would pose a safety hazard for standees. The load factor for local services is 1.25, as these services generally do not operate on limited-access highways and standees do not pose the same safety hazard. *Table 25* identifies the capacity and load factor for each type service FCDOT offers.

Table 25 Maximum Acceptable Vehicle Loads

Service Type	Maximum Load Factor
Commuter Services	1.00
Local Services	1.25

Vehicle Headway

Vehicle headway, or frequency, represents the amount of time between two vehicles traveling in the same direction on a given route. *Table 26* summarizes the minimum frequency for each type of route. Vehicle headway standards are developed through FCDOT’s Transit Development Plan, which is updated every five years.

Table 26 Minimum Acceptable Vehicle Headways

Type of Route	Minimum Peak Period Frequency	Minimum Off-Peak Frequency
Full-Day Routes		
Weekday	30 min	30 min (60 min after 9:00 PM)
Saturday	30 min (base ¹⁵)	60 min (fringe ¹⁶)
Sunday	60 min	60 min
Weekday Peak-Only Routes		
Morning	20 min (peak of the peak)	30 min (fringe of the peak)
Afternoon	20 min (peak of the peak)	30 min (fringe of the peak)

¹⁵ Saturday base is defined as 9:00 AM to 5:00 PM.

¹⁶ Saturday fringe is defined as after 5:00 PM.

On-Time Performance

FCDOT requires its operating contractor to maintain a minimum standard of “on-time bus trips” for each route of at least 85 percent. “On-time” is defined as between one and six minutes late leaving scheduled time points as established in the bus route schedule to include the starting point of any scheduled trip; trips shall not leave any scheduled time point ahead of schedule.

Service Availability

Service availability is a measure of coverage, indicating how many residents in a service area have access to fixed-route transit. FCDOT sets a standard whereby 50 percent of the County’s population should have access, measured as population within a quarter-mile of a Fairfax Connector bus route.

3.2 Transit Service Policies

Transit Amenities

Transit amenities refer to items of comfort, convenience, and safety that are available to customers. FCDOT has an established process for determining site selection for amenities, outlined in the *Fairfax County Bus Stop Guidelines* document. The County uses the standard operating procedures and policies outlined in this guide to ensure transit amenities are equitably distributed. The policies established in these guidelines include the following:

- *Bus shelters*: A bus shelter and pad may be installed at stops with an average of 50 or more boardings per day, at a transit center or park-and-ride-lot owned by Fairfax County, or if the stop is at a major activity center.
- *Benches*: Benches with pads may be installed if the stop is located at a transit center or park-and-ride lot or if the stop is a major activity center, generating 25 or more passenger boardings per day, or at stops located near significant populations of seniors, the disabled, students, or other special uses (e.g., tourist attractions).
- *Provision of information*:
 - Bus stop signs are installed at all locations with two variations: local and regional (for stops jointly served by WMATA’s Metrobus) designs. Each bus stop has a unique bus stop ID that can be used for the Bus Tracker real time arrival and route information available via phone and internet applications.
 - Bus route Rider Information Guides (2 to 4-sided mounted display units) which contain schedule and individual system maps are installed at all transit stations (bus/rail) and park-and-ride lots where Fairfax Connector bus service operates and have designed service bays.
 - Bus System Maps are installed in bus shelters at transit stations (bus/rail) that are primarily served by Fairfax Connector routes only and park-and-ride lots where Fairfax Connector bus service operates and have designated service bays.
- *Escalators and elevators*: FCDOT generally does not provide or maintain escalators or elevators at any bus stops, except for the ones at Wiehle Reston East Metrorail Station and Herndon Monroe and Burke Centre garages.

- *Waste receptacles:* Waste receptacles are installed at all stops where there is a demonstrated issue with littering.

Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are assigned to routes for revenue service. Fairfax Connector’s vehicles are assigned to three bus divisions: Herndon, West Ox, and Huntington. However, individual buses are generally not assigned to individual routes. Buses are deployed to individual routes based on fleet availability on the day of service, size of the bus, the capacity needed on the routes served, and the route’s roadway characteristics (i.e., buses that travel in residential neighborhoods with narrow streets must be smaller). Fairfax Connector does track the individual buses used on routes via its intelligent transportation systems (ITS) capabilities.

Buses are replaced at the end of their useful life in accordance with Fairfax Connector’s fleet replacement plan. The Fairfax Connector has a comprehensive preventive maintenance and component replacement program which ensures a high level of vehicle reliability. The oldest vehicles in the Fairfax Connector fleet date to 2007, while the average age of the fleet is 9.4 years. All vehicles in the Fairfax Connector fleet are low-floor, which is consistent with Fairfax Connector’s policy is to purchase only low-floor vehicles. *Table 27* is the Fairfax Connector Fleet Profile.

Table 27 Fairfax Connector Fleet Profile

Make	Size	Number	Year	Age
New Flyer	35 feet	16	2007	13
New Flyer	40 feet	52	2007	13
Orion VII	30 feet	26	2008	12
New Flyer	40 feet	45	2009	11
New Flyer	40 feet	31	2011	9
New Flyer	40 feet	37	2011	9
New Flyer	35 feet	15	2012	8
New Flyer	40 feet	20	2012	8
New Flyer	40 feet	19	2013	7
New Flyer	35 feet	17	2014	6
New Flyer	35 feet	12	2015	5
New Flyer	40 feet	5	2015	5
New Flyer	35 foot	14	2018	2
New Flyer	40 foot	4	2019	1

3.3 Transit Service Monitoring

This section evaluates the performance of Fairfax Connector per the service standards and policies set forth in Fairfax County’s Title VI Program to ensure both transit service and transit amenities are equitably distributed across the service area, regardless of whether a route primarily serves minority or non-minority populations. The FTA defines a minority bus route as one where one third or more of the route’s revenue miles fall within a minority Census block

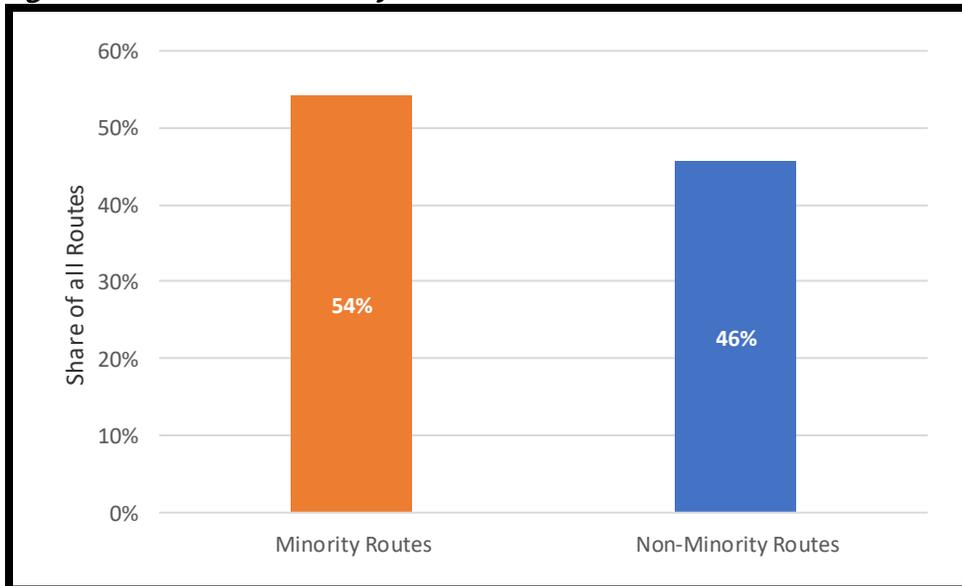
group. A minority Census block group is defined as one in which the percentage minority population exceeds the percentage minority population in the service area. The minority population comprises 48.7 percent of the total population Fairfax County;¹⁷ therefore any Census block group in which the minority population comprises 48.7 percent of the population or higher is considered to be a minority Census block group.

Application of Minority Bus Route Definition

An initial GIS analysis identified minority routes by the percentage of each route’s revenue length that intersect minority Census block groups. This definition of minority routes was applied to all routes except those that run along a highway or have limited stops to the route destination. For commuter routes and express routes, due to the fact that they often run long distances and sometimes on limited access highways where boarding/alighting does not occur, a slightly modified methodology was required. The number of bus stops in minority block groups and in non-minority block groups was counted, and the route was designated as minority or non-minority classification based on whichever type of block group had the greater number of stops. If a route had an equal number of minority and non-minority stops, the route was designated as a minority route to be conservative.

Of Fairfax Connector’s 92 routes, 50 routes (54 percent) are considered minority routes and 42 routes (46 percent) are considered non-minority. The final classification distribution is depicted in *Figure 6*.

Figure 6 Distribution of Minority Routes



¹⁷ United States Census Bureau’s 2015 2014-2018 American Community Survey (ACS) Five-Year Estimates

3.4 Major Service Change, Disparate Impact, and Disproportionate Burden Policies

In accordance with the requirements of Federal Transit Administration (FTA) Circular 4702.1B, Title VI Requirements for Federal Transit Administration Recipients, the Fairfax County Department of Transportation (FCDOT) must establish policies and thresholds for what constitutes a Major Service Change, Disparate Impact, and Disproportionate Burden for use in future service equity and fare equity analyses. The Board of Supervisors approved these policies and their accompanying thresholds on September 15, 2020. According to the Circular, the County must revisit these policies every three years and make revisions as necessary. While a new analysis was completed to ensure these thresholds continue to meet FTA guidelines, the proposed policies and thresholds for FY 2021-2023 are unchanged.

The use of these policies to evaluate proposed service and fare changes prior to implementation is designed to determine whether those changes will have a discriminatory impact based on race, color, or national origin.

A major service change is a numerical threshold in change of service that determines when changes are large enough in scale for the individual transit system to require a subsequent service equity analysis.

FTA C 4702.1B defines disparate impact and disproportionate burden as follows:

“The transit provider shall develop a policy for measuring **disparate impacts**. The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly, regardless of mode, and cannot be altered until the next Title VI Program submission.” (FTA C 4702.1B, Chap. IV-13)

“The transit provider shall develop a policy for measuring **disproportionate burdens** on low-income populations. The policy shall establish a threshold for determining when adverse effects of service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations. The disproportionate burden threshold must be applied uniformly, regardless of mode.” (FTA C 4702.1B, Chap. IV-17).

FTA C 4702.1B requires that if a disparate impact on minority communities is found, Fairfax County must determine ways to avoid, minimize, or mitigate the impact. Fairfax County can

only implement a proposed change that results in a disparate impact, if substantial legitimate justification exists, and there are no alternatives meeting the same legitimate objectives. FCDOT is committed to adequately addressing any adverse impacts that result in a disproportionate burden to low-income communities.

Title VI Policies

FCDOT's current major service change, disparate impact, and disproportionate burden policies for Fairfax Connector FY 2021-2023 are as follows:

Major Service Change (MSC)

A major service change is defined as either an increase or a decrease of 25 percent or more in either daily revenue service hours, revenue service miles, or both for the individual route being modified.

FCDOT Major Service Change Policy Key Definitions:

- *Daily Revenue Service Hours:* The number of hours a bus operates while carrying paying passengers.
- *Revenue Service Miles:* The number of miles a bus operates while carrying paying passengers.

Disparate Impact (DI)

A disparate impact occurs when the difference between minority riders and non-minority riders affected by a proposed service change or fare change is 10 percent or greater.

Disproportionate Burden (DB)

A disproportionate burden occurs when the difference between low-income riders and non-low-income riders affected by a proposed service change or fare change is 10 percent or greater.

The Disproportionate Burden and Disparate Impact thresholds were evaluated by examining Service Equity Analyses performed since the approval of the previous Title VI Program, as described in the Service Equity Analyses section of this report. After this review and public input, it was decided that there was no need to change the thresholds. These policies establish a threshold for determining when adverse effects of service changes or fare changes are disparate or disproportionate. FTA's Title VI Circular 4702.1B requires FCDOT to prepare and submit service and fare equity analysis for major service changes and all fare changes prior to implementing service and/or fare changes. Every Major Service Change requires a Service Equity Analysis. Changes can have a Disparate Impact (DI) on minority riders. Changes can have a Disproportionate Burden (DB) on low-income riders.

The analyses are to determine whether the planned changes will have a disparate impact on the basis of race, color, or national origin, or if low-income populations will bear a disproportionate burden of the changes. DI/DB Policies help determine when a Major Service Change creates these inequities.

Major Service Change, Disparate Impact, and Disproportionate Burden Policy Development

To develop the new major service change, disparate impact, and disproportionate burden policies and thresholds, FCDOT first reviewed the policies and thresholds established in 2017 and the methodology used in their establishment. Staff also employed a variety of informational items and data, including:

- Census data analysis on the demographic and socio-economic composition of the population living within a quarter mile of a Fairfax Connector route, which is the distance recommended by FTA.
- Ridership survey data collected in 2019.
- Policies in place at peer transit agencies in the Washington, D.C. metropolitan area and across the United States.

Data availability and ease of application to determine when a major service change is proposed is important for creating these policies and thresholds, as transparency is critical for the public input process required in their development.

To estimate future service needs, FCDOT conducts periodic surveys of passengers. In 2019, FCDOT contracted with WBA Research and Cambridge Systematics to conduct the Fairfax Connector Origin & Destination Study among Fairfax Connector customers. Surveys were conducted on a sampling of 25 percent of trips representing one weekday, one Saturday, and one Sunday of travel.

The purpose of the 2019 On-Board Survey was three-fold:

- Collect information on the demographic characteristics and travel patterns of Fairfax Connector riders to comply with FTA Title VI reporting requirements and guidelines;
- Obtain information on Fairfax Connector passenger behavioral tendencies and preferences (e.g., fare payment methods, information sources used for travel decisions, etc.) to inform Fairfax Connector's efforts to increase ridership and improve the customer experience; and
- Obtain origin & destination information for future planning purposes.

FTA requires that the major service change policy address both service reductions and service increases for all fixed modes of service. Like FCDOT's current policy, the proposed major service change policy therefore considers the availability of daily revenue service miles and hours. Revenue service hours and revenue service miles were both included in the major service change policy, due to the different types of service offered by the Fairfax Connector; some Fairfax Connector routes run for short periods of time over long distances, while other routes run for many hours in revenue service, but operate over a small geographic area. Ultimately, FCDOT's Service Equity Analysis of the past three years and public input re-confirmed that the current policy of 25 percent in either revenue service reductions or

increases as the threshold for constituting a major service change. The 25 percent threshold triggered nine Major Service Change designations, six of which were entirely new routes. The remaining three service changes were also generally well above the established threshold. Route modifications below the 25 percent threshold impacted very few riders and did not cause significant negative public reactions. Public input for the proposed Major Service Change policy also corroborated this policy.

The disproportionate burden and disparate impact thresholds were evaluated by examining service equity analyses performed since the approval of the previous Title VI Program (for a full discussion of these analyses, see Major Service Changes Implemented from FY 2018 to FY 2020 section below). The minority and low-income percentages of the population living within a quarter mile of routes affected by major service changes were compared with the minority and low-income percentages of the population living within the entire Fairfax Connector survey area. The Service Equity Analysis showed that a 10 percent threshold for both disproportionate burden and disparate impact would again meet the goal of FTA Title VI Circular 4702.1B, in that it is not so low as to always identify an impact, nor so high as to never identify an impact. Public input generally agreed with the proposed 10 percent threshold for non-adverse changes, but they were less confident in the same proposed threshold for adverse changes.

Major Service Change, Disparate Impact, and Disproportionate Burden Public Comment

A public comment period on the proposed major service change, disparate impact, and disproportionate burden policies was held from June 29, 2020, to July 31, 2020. *Figure 7* shows FCDOT's press release initiating the public comment period. Members of the public were offered several different options for providing comment, including:

- An online survey;
- Virtual focus groups for representatives of community organizations serving minority and low-income populations; and
- A webpage featuring both the proposed written policies as well as a recorded presentation video explaining the Major Service Change and Disparate Impact/Disproportionate Burden policies.

The online presentation, also used for focus group presentations can be found in *Appendix C*. A summary of the public responses collected by FCDOT during the comment period are contained in *Appendix D*.

Figure 7: Fairfax County Department of Transportation Requests Feedback on Proposed Update to Title VI Policies

[Fairfax County Department of Transportation Requests Feedback on Proposed Update to Title VI Policies](#)

eRelease

June 29, 2020

[Fairfax County Department of Transportation \(FCDOT\)](#) invites you to provide feedback on the [proposed update of its Title VI program](#). Title VI policies ensure equitable distribution of transit service changes and as part of the update process the public is encouraged to give input on:

- **Proposed Major Service Changes** – Service changes that are significant enough to require special analysis that ensure the proposed changes will not have discriminatory effects on minority or low-income areas
- **Disparate Impacts** – Service changes that have discriminatory effects on minority areas
- **Disproportionate Burdens** – Service changes that have discriminatory effects on low income areas.

Disparate Impacts and **Disproportionate Burdens** are determined by comparing minority and low-income percentages of the population with non-minority and non-low-income percentages of the population affected by the proposed changes in Fairfax County.

- [View video presentation of the proposed changes.](#)

Proposed Major Service Change Policy

A major service change is a numerical threshold in change of service that determines when changes are large enough in scale to require the individual transit system to perform a service equity analysis.

FCDOT's proposed Major Service Change Policy is as follows: *A major service change is defined as either an increase or a decrease of 25 percent or more in either daily revenue service hours, revenue service miles, or both for the individual route being modified.*

Major Service Change Key Definitions:

- **Daily Revenue Service Hours:** Number of hours bus operates while carrying paying passengers.
- **Revenue Service Miles:** Number of miles a bus operates while carrying paying passengers.

Proposed Disparate Impact/Disproportionate Burden Policy

A Disparate Impact/Disproportionate Burden policy defines a numerical threshold that determines when a "major service change" impacts minority riders or burdens low-income riders at a rate greater than non-minority or non-low-income riders.

FCDOT's proposed Disparate Impact is as follows: *A disparate impact occurs when the difference between minority riders and non-minority riders affected by a proposed service change or fare change is 10 percent or greater.*

FCDOT's proposed Disproportionate Policy is as follows: *A disproportionate burden occurs when the difference between low-income riders and non-low-income riders affected by a proposed service change or fare change is 10 percent or greater.*

Ways to Provide Feedback Through July 31, 2020.

We invite you to share your thoughts on these important policies through July 31, 2020. You can provide feedback by:

1. Taking a brief survey available in the languages below:
 - a. [English](#)
 - b. [Amharic](#)
 - c. [Arabic](#)
 - d. [Chinese](#)
 - e. [Farsi](#)
 - f. [Hindi](#)
 - g. [Korean](#)
 - h. [Spanish](#)
 - i. [Tagalog](#)
 - j. [Urdu](#)
 - k. [Vietnamese](#)
2. Emailing your comments to dotinfo@fairfaxcounty.gov
3. Calling 703-877-5600, TTY 711
4. Mailing your comments to: Fairfax County Department of Transportation, Attention: Title VI Plan Update/B. Atsem, [4050 Legato Road, Suite 400, Fairfax, VA 22033-2895](#)

If you have additional questions or would like material in another language, please contact FCDOT at 703-877-5600, TTY 711.

Fairfax County Transportation News and Information

Sign-up for alerts at <http://www.fairfaxcounty.gov/alerts>

Follow FCDOT on [Facebook](#) or visit <http://www.fairfaxcounty.gov/transportation/news>
Fairfax Connector on [Twitter](#) or [Facebook](#) or visit <http://www.fairfaxcounty.gov/connector/news>

Media Relations

Robin P. Geiger, Head of Communications, [Fairfax County Department of Transportation](#),
via [e-mail](#)

Call 703-877-5602, TTY 711 (direct); 703-826-6457, TTY 711 (cell); 703-268-8953, TTY 711 (after hours)

Accessibility

Fairfax County Department of Transportation (FCDOT) ensures nondiscrimination in all programs and activities in accordance with Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act (ADA). If you need this information in an alternate format or would like to request reasonable accommodations for persons with disabilities or limited

English proficiency for events, contact FCDOT at 703-877-5600, TTY 711. Requests for assistance must be received at least 7 business days in advance of an event.

Online Survey

To solicit feedback on the proposed policies, FCDOT offered an online survey in 11 different languages, including English, Spanish, Korean, Amharic, Vietnamese, Tagalog, Chinese, Farsi, Hindi, Urdu, and Arabic. The survey was identical in each language. Using examples to make the concepts more accessible, the survey described FCDOT's current major service change, disparate impact, and disproportionate burden policies and asked survey takers to provide their opinions about them through multiple-choice questions. Survey takers were also provided the opportunity to provide open ended comments about the policies. *Figure 8* provides a screen shot of FCDOT's online survey page. The survey questions are included in *Appendix E*.

Figure 8: Fairfax County Notice of Public Comment Period for Major Service Change, Disparate Impact, and Disproportionate Burden Policies

The screenshot shows the Fairfax County website with a navigation bar including RESIDENTS, BUSINESS, GOVERNMENT, FAIRFAX COUNTY VIRGINIA, SERVICES, CONNECT, and SEARCH. A banner at the top reads "Fairfax Connector Announces Service Reductions due to Impacts of COVID-19". The main content area is titled "Fairfax Connector" and "Title VI Policy 2020 Update".

DEPARTMENT RESOURCES

- Fairfax Connector Homepage
- Contact Us
- Frequently Asked Questions (FAQ)
- BusTracker
- Service Advisories
- Fairfax Connector Operating Status
- Fares and Policies

Title VI Policy 2020 Update

FCDOT is updating its Title VI program and needs your feedback. FCDOT's Title VI policies dictate how we measure equitable distribution of transit service changes. As part of the update process, we are seeking feedback on the proposed Major Service Change and Disparate Impact/Disproportionate Burden policies.

- Major Service Changes** are changes that are significant enough to require special analysis that ensure that the proposed changes will not have discriminatory effects on minority or low-income areas.
- Disparate Impact** describes a service change that has discriminatory effects on minority areas
- Disproportionate Burden** describes a service change that has discriminatory effects on low-income areas.

Provide Feedback Through July XX, 2020

We invite you to share your thoughts on these important policies through July x, 2020. You can provide feedback by:

- Taking a brief survey**

Title VI Notices	Title VI Complaints and Instructions	Survey
English	English	https://www.surveymzmo.com/s3/5650557/FCDOT-English
Amharic አማርኛ	Amharic አማርኛ	https://www.surveymzmo.com/s3/5681536/FCDOT-Amharic
Arabic عربي	Arabic عربي	https://www.surveymzmo.com/s3/5677357/FCDOT-Arabic
Chinese 波斯语	Chinese 波斯语	https://www.surveymzmo.com/s3/5681918/FCDOT-Chinese
Farsi فارسی	Farsi فارسی	https://www.surveymzmo.com/s3/5681856/FCDOT-Farsi
Hindi हिंदी	Hindi हिंदी	https://www.surveymzmo.com/s3/5681482/FCDOT-Hindi
Korean 한국어	Korean 한국어	https://www.surveymzmo.com/s3/5682214/FCDOT-Korean

Department of Transportation

- Benefits Plu\$50
- Guaranteed Ride Home
- Metrobus/Metrorail
- WMATA Trip Planner
- Fairfax CUE
- Fastran
- Arlington Transit (ART)
- Loudoun County Transit
- Virginia Railway Express (VRE)
- Amtrak
- PRTC
- Capital Bikeshare

SUBSCRIBE TO DEPARTMENT

Fairfax Alerts →

DEPARTMENT

Fairfax Alerts →

Language	Language	URL
Korean 한국어	Korean 한국어	https://www.surveygizmo.com/s3/5682214/FCDOT-Korean
Spanish Español	Spanish Español	https://www.surveygizmo.com/s3/5682156/FCDOT-Spanish
Tagalog	Tagalog	https://www.surveygizmo.com/s3/5682273/FCDOT-Tagalog
Urdu اردو	Urdu اردو	https://www.surveygizmo.com/s3/5681441/FCDOT-Urdu
Vietnamese Tiếng Việt	Vietnamese Tiếng Việt	https://www.surveygizmo.com/s3/5682319/FCDOT-Vietnamese

2. Emailing your comments to dotinfo@fairfaxcounty.gov
3. Calling 703-877-5600, TTY 711.
4. Mailing your comments to:

Fairfax County Department of Transportation
 Attention: Title VI Plan Update/B. Atsem
 4050 Legato Road, Suite 400
 Fairfax, VA 22033-2895

If you have additional questions or would like material in another language, please contact FCDOT at 703-877-5600, TTY 711.

A total of 111 responses to the online survey were received. Respondents were generally satisfied with the county’s major service change definition, with 86 percent agreeing with the 25 percent threshold for revenue hours and 78 percent agreeing with the 25 percent threshold for revenue miles. Comments on the major service change policies encouraged the County to focus on the needs of low-income, disabled, and other vulnerable populations when making decisions on what routes to change. In addition, commenters encouraged the County to take into account not just the total hours and miles, but also the ridership, areas served, and times of day served, as they are impacted by service changes; and asked the County to give riders adequate notice and enough information about service changes when they do occur.

Survey respondents expressed mixed opinions about FCDOT’s 10 percent threshold for disparate impacts and disproportionate burdens. Respondents were asked to evaluate both adverse and non-adverse changes for both disparate impact and disproportionate burden thresholds, based on existing populations of minorities and low-income individuals in Fairfax County. Respondents were generally in favor of the 10 percent thresholds for non-adverse changes for both disparate impacts and disproportionate burdens (42 and 46 percent agreed with these thresholds, respectively). However, respondents generally disagreed with the 10 percent thresholds for adverse changes for both disparate impacts and disproportionate burdens (49 and 48 percent disagreed with these thresholds, respectively). Comments directly addressing these policies stated that the thresholds should be tighter: some respondents suggested that thresholds should be lowered (suggestions for this included five and 7.5

percent), while others went so far as to say that it would be impossible for any reduction in service to be done equitably. Commenters also emphasized the importance of making sure that low-income residents, people with disabilities, and minority residents are at the table when decisions are made so that service can be truly equitable. To see all the online survey results, see *Appendix E*.

Focus Groups

FCDOT, with the assistance of the Fairfax County Office of Human Rights and Equity Programs (OHREP), organized four focus groups for community-based organizations to solicit feedback directly from community stakeholders serving minority, low-income, and limited English proficient populations. FCDOT invited approximately 120 organizations to the focus group meetings. Representatives from four of the organizations participated in the meetings.

Due to COVID-19 pandemic and the social gathering restrictions in place at the time of public comment, all four focus groups were held virtually over Zoom video conferencing platform. Participants signed up for available focus group meeting dates through Sign-up Genius.

Each focus group included a 45-minute presentation that provided an overview of FCDOT’s Title VI Program development process and explained the proposed disparate impact and disproportionate burden and major service change policies and how they would be applied. At key intervals during the presentation, the moderator paused to allow for discussion and comment.

Table 28: Title VI Focus Group Locations

Date and Time	Location	Public Meeting Attendees
Monday, July 13, 2020; 7:00 PM - 8:00 PM	Zoom Web Conference	One attendee (Dulles Regional Chamber of Commerce)
Wednesday, July 15, 2020; 12:00 PM - 1:00 PM	Zoom Web Conference	One attendee (Lorton Community Action Center)
Thursday, July 16, 2020; 12:00 PM - 1:00 PM	Zoom Web Conference	One attendee (Irving Middle School)
Thursday, July 30, 2020; 3:00 PM - 4:00 PM	Zoom Web Conference	One attendee (Hispanic Chamber of Commerce)

Focus Group Feedback Summary

While just four organizations participated in the focus groups, those that did participate provided substantive feedback regarding Fairfax Connector services. The participants also gained an understanding of how FCDOT developed and will apply the major service change, disparate impact, and disproportionate burden policies. Participants asked clarifying questions about the policies and agreed with the thresholds recommended by FCDOT for major service change, disparate impact, and disproportionate burden policies.

All of the participants noted the importance of partnering and having effective communication between FCDOT and their community members. Suggestions included:

- Having FCDOT provide information in multiple languages about services offered and service changes to riders at bus stops and other places in the community;
- FCDOT participating in activities with the Chamber of Commerce; and
- FCDOT partnering with the county school system to advertise bus services available to students and parents.

Participants also noted specific topics of concern for providing service to minority and low-income residents, including: ensuring that restructuring the bus routes in response to Phase II of the Silver Line opening will not just prioritize commuters traveling to the District of Columbia over lower-wage workers traveling to jobs along the Dulles Toll Road corridor; Lorton area riders lacking fast and frequent options for traveling to Springfield and Richmond Highway; and, student travel to school and parent travel to work via transit during the COVID-19 pandemic and the difficulties in providing enough capacity to allow for social distancing. To view all focus group responses, see *Appendix D*.

Public Comments Received via Email or US Postal Service

FCDOT received comments electronically via the online survey but did not receive any comments via email. FCDOT did not receive any comments via the US Postal Service.

Overall Responses Received

Due to COVID-19, FTA granted all public transportation agencies in the United States a two-month extension on completing Title VI Program updates, which would ordinarily be due to FTA by August 1, 2020. FTA recognized that many agencies, like FCDOT, would not be able to do traditional face-to-face public outreach to complete the Major Service Change, Disparate Impact, Disproportionate Burden policies, which are a critical element of the Title VI Program requirement. Agencies were permitted to take the additional time to develop and implement their own electronic outreach strategies. FCDOT developed a strategy that included a web page with a pre-recorded presentation detailing the proposed policies, an online survey, and a series of focus group presentations. The public was guided to the website through an intensive social media outreach strategy that utilized multiple platforms. Historically, FCDOT has only provided a static, text-only web page and in-person focus groups to develop these policies.

For the previous three-year period, FCDOT had four individuals participate in the in-person focus group meetings. The results were the same for this year's renewal, although the sessions were all done virtually. FCDOT only received two written comments via email for the previous period.

For this renewal effort, FCDOT had 111 respondents to the online survey, in addition to the four focus group participants. This represents a very significant increase in the total amount of feedback that was received. Going forward, FCDOT will continue to use a similar social media

and electronic media outreach strategy to develop similar policies. However, FCDOT also anticipates incorporating more traditional, face-to-face communications once it is safe to do so.

3.5 Major Service Changes Implemented from FY 2018 to FY 2020

Summary of Analysis Results

The service changes proposed for implementation since the approval of Fairfax County's previous Title VI program in 2017 were reviewed as mandated by the Federal Transit Administration (FTA) in Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. Nine routes experienced a major service change in this time period. Of these changes, six involved the creation of a new route, while the remaining three involved extending the area served by, or making service more frequent on, existing routes. These service changes are described in *Table 29*.

Table 29: List of Major Service Changes, September 2017 to May 2020

Date of Change	Route	Proposed Service Changes	Percent Changes in Revenue Hours	Percent Changes in Revenue Miles
			Weekday	Weekday
September 2017	321	Increase span of service and frequencies; modify alignment	53%	48%
September 2017	322	Increase span of service and frequencies; modify alignment	51%	65%
September 2017	323	Restructure service as Route 340 and 341; extend service to Boston Boulevard; modify alignment	N/A	33%
December 2017	699	Create new route	100%	100%
January 2019	698	Create new route	100%	100%
March 2019	308	Create new route	100%	100%
March 2019	467	Create new route	100%	100%
January 2020	396	Create new route	100%	100%
May 2020	697	Create new route	100%	100%

Table 30 and *Table 31* below show the disparate impact and disproportionate burden analyses, respectively, using the 10 percent threshold that the Board of Supervisors set in the County's 2017 Title VI Program. Note that since all of the major service changes within the past three years involved adding service, a finding of disparate impact or disproportionate burden requires that the minority or low-income populations in the route's service area be a smaller percentage (the service area average minus 10 percent) of the route's service area population than for the entire Fairfax Connector service area.

The results in *Table 30* and *Table 31* demonstrate that none of the major service changes implemented by FCDOT in the past three years constitute a disparate impact or disproportionate burden. Importantly, the service areas around most of these routes with additions to service contain minority and low-income populations in proportions similar to those found in the entire Fairfax Connector service area. This means that if FCDOT were to adjust the 10 percent threshold to be lower, this would not cause substantially more findings of disparate impact or disproportionate burden. For instance, halving the threshold, from 10 percent to five percent, would generate only one additional finding of disparate impact (the March 2019 change to Route 467) and no additional findings of disproportionate burden. While FCDOT could reduce its thresholds to zero percent to produce more findings of disparate impact and disproportionate burden (three and five findings, respectively), this would be out of touch with regional peer agencies, which have generally set thresholds between five percent and 15 percent.

Table 30: Summary of Corrected FCDOT Service Equity Analyses: Disparate Impact

Date of SEA	Routes Affected	Route Area Population	Route Area Minority Population	Route Area Minority Population Percent (A)	Service Area Minority Population Percent (B)	Difference (B - A)	Threshold	Threshold Exceeded?
September 2017	321 / 322	36,156	20,653	57%	47%	-9.7%	10%	No
September 2017	323	11,490	5,446	47%	47%	0.0%	10%	No
December 2017	699	177,294	80,504	45%	47%	2.0%	10%	No
January 2019	698	477,877	215,441	45%	47%	2.3%	10%	No
March 2019	308	25,717	17,907	70%	47%	-22.2%	10%	No
March 2019	467	15,194	6,426	42%	47%	5.1%	10%	No
January 2020	396	136,188	69,472	51%	47%	-3.6%	10%	No
May 2020	697	186,982	90,370	48%	47%	-0.9%	10%	No

Table 31: Summary of Corrected FCDOT Service Equity Analyses: Disproportionate Burden

Date of SEA	Routes Affected	Route Area Households	Route Area Low-Income Households	Route Area Low-Income Households Percent (A)	Service Area Low-Income Households Percent (B)	Difference (B - A)	Threshold	Threshold Exceeded?
September 2017	321 / 322	13,401	2,448	18%	18%	0%	10%	No
September 2017	323	4,275	900	21%	18%	-3%	10%	No
December 2017	699	60,559	9,007	15%	18%	3%	10%	No
January 2019	698	166,485	28,262	17%	18%	1%	10%	No
March 2019	308	8,666	2,924	34%	18%	-16%	10%	No
March 2019	467	5,853	861	15%	18%	3%	10%	No
January 2020	396	48,795	7,592	16%	18%	2%	10%	No
May 2020	697	72,319	11,070	15%	18%	2%	10%	No

Conclusion

Based on these results, FCDOT does not propose to change the disparate impact or disproportionate burden policies.

3.6 Major Fare Changes Implemented from FY 2018 to FY 2020

Requirement for a Fare Equity Analysis

Under *FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients*, the FCDOT is required to undertake an evaluation of any proposed fare changes, either increase or decrease, to determine whether it has a discriminatory impact on Title VI protected minority populations or on low-income populations. The requirement applies to any and all fare media and fare level changes, whether increases or decreases, and applies to any transit operator with at least 50 vehicles in peak service.

FCDOT did not implement any fare changes during the reporting period, so no additional evaluation is conducted.

3.7 Analysis of Transit Service Standards

FTA C 4702.1B requires FCDOT to evaluate its defined standards and policies to ensure service equity between minority and non-minority routes, which are described above. The following are the standards and policies that FCDOT has measured for each of its routes:

Standards

- Vehicle load
- Vehicle headway
- On-time performance
- Service accessibility

Policies

- Vehicle assignment
- Distribution of transit amenities

FCDOT's computer-aided dispatch and automatic vehicle locator (CAD-AVL) and automatic passenger count (APC) systems are used in to monitor the performance of routes against these standards.

Vehicle Load

The vehicle load metric is used to determine if a bus is overcrowded. A vehicle load is the average maximum number of people seated and standing during the peak period in the peak direction. Vehicle passenger load is measured by the ratio of passengers on a vehicle (load) to seated capacity (load/seat ratio). Through FCDOT's automatic passenger counter data, the maximum load for all routes for weekdays, Saturdays, and Sundays is available.

Figure 9 displays the average daily maximum load factors for local routes on weekdays, Saturdays, and Sundays for the period of January 27 - February 28, 2020. *Figure 10* shows the same information for commuter routes. For local routes, minority routes have higher average daily maximum load factors than non-minority routes. For commuter routes, minority routes have lower average daily maximum load factors than non-minority routes. The average maximum loads for minority and non-minority routes are well below the number of seats available on the bus and FCDOT's policy of a 1.25 maximum load factor for local routes and 1.00

for commuter routes. Overall, only one route surpasses the policy—Route 699, which is a non-minority commuter route.¹⁸ Due to its success, capacity on this route will be expanded as of August 2020.

Figure 9 Local Route Average Daily Maximum Load Factors: January - February 2020

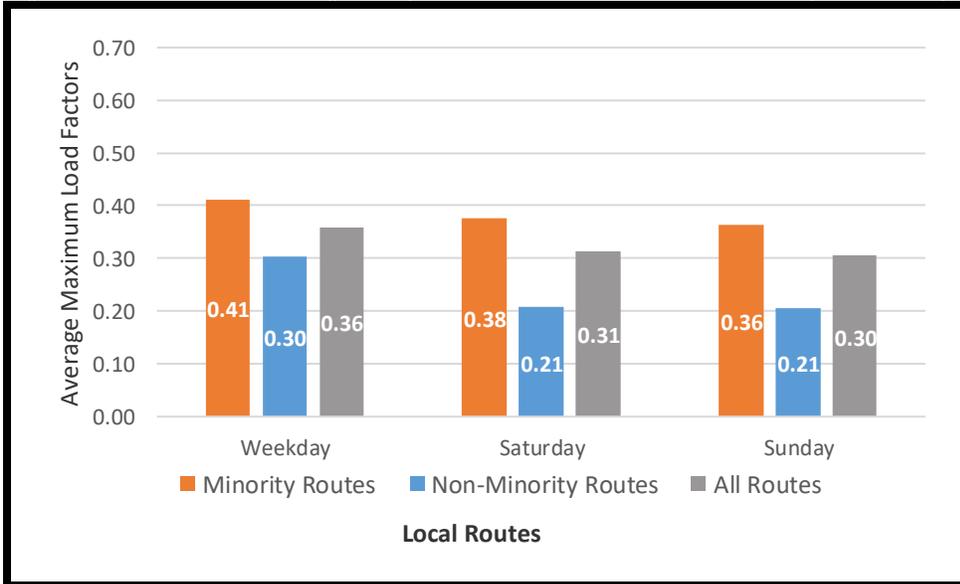


Figure 10 Commuter Route Average Daily Maximum Load Factors: January - February 2020



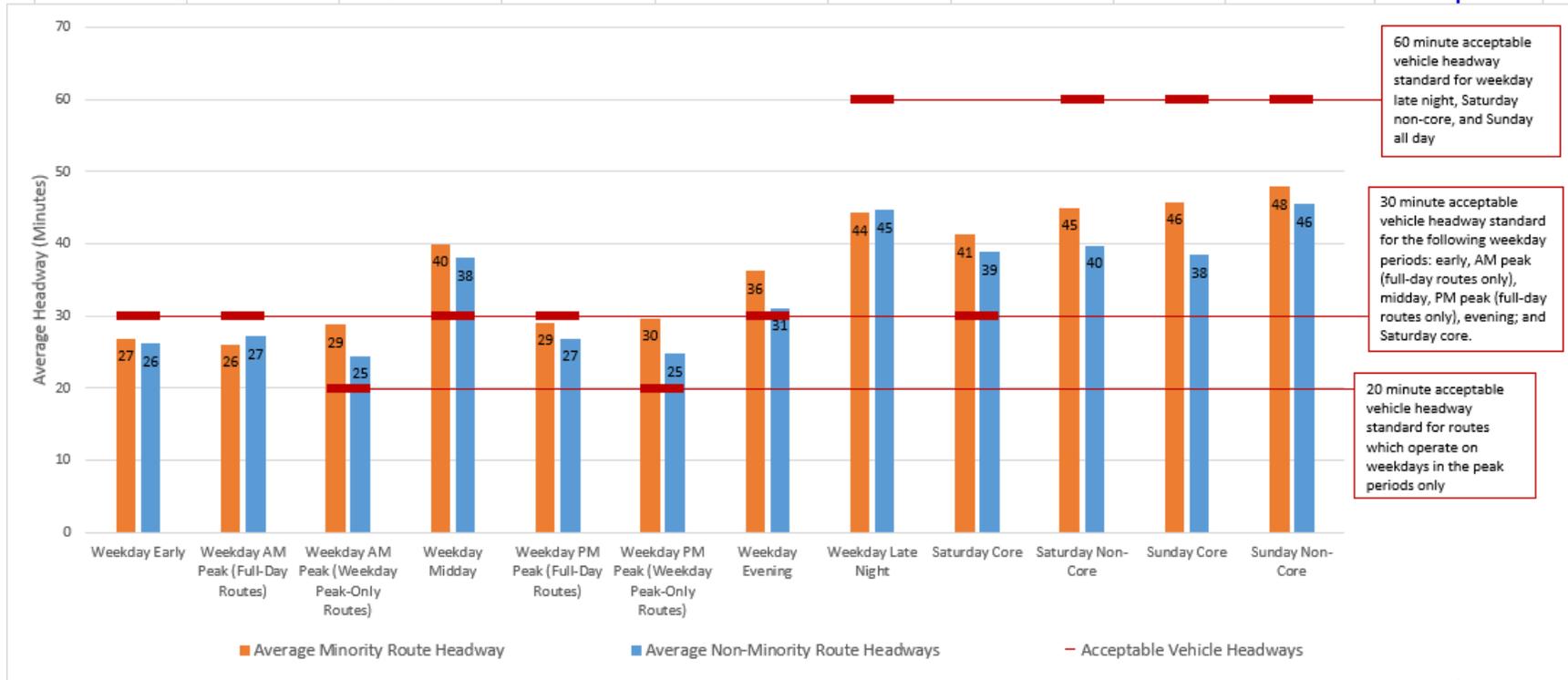
¹⁸ Vehicle assignment data was missing for Routes 396, 480, and RIBS 1 – 5. Route performance data was unavailable for Route 480.

Service Headways

Headway by time of day for both weekday and weekend service is a measure of the level of service of a bus route. *Figure 11* illustrates the variation in service headways by day of week and time of day for minority and non-minority routes as well as the standards for each time period. Route-level headway information was summarized by time period and averaged across minority and non-minority routes. FCDOT has different headway standards for peak-only and all-day routes, as described in *Section 3.1*. To monitor this service, FCDOT compared the average headway for minority and non-minority routes in the weekday peak periods to the standard.

The difference in average headways between minority and non-minority routes was minimal across most time periods. For all-day routes, minority routes had average headways at least five minutes longer than non-minority routes during weekday evenings (6:00-11:00 PM), Saturdays during the non-core period (before 8:00 AM and after 5:00 PM), and Sundays during the core period (8:00 AM-5:00 PM). For peak-only routes, minority routes had average headways at least five minutes longer than non-minority routes during the weekday PM peak period.

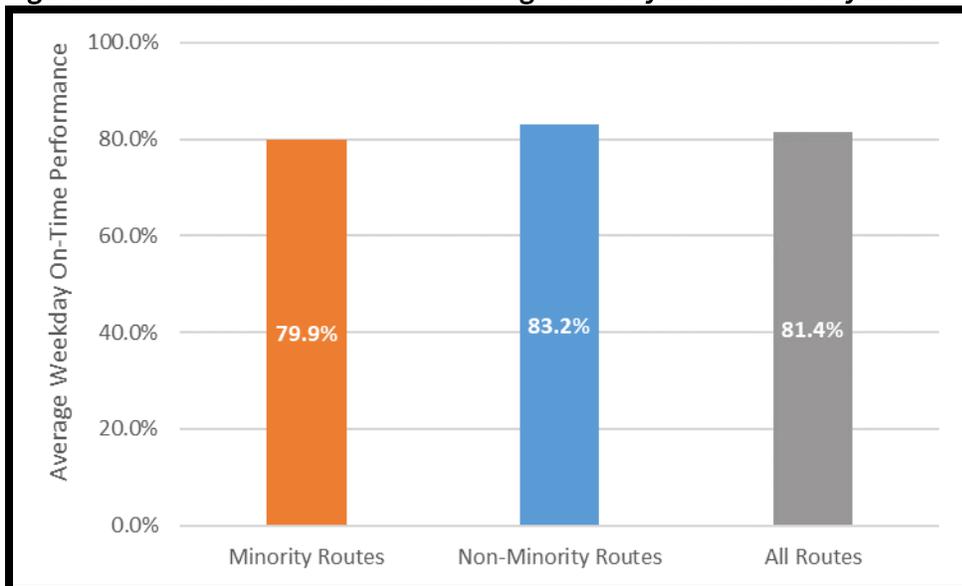
Figure 11 Average Service Headways (Minutes)



On-Time Performance

Average weekday on-time performance was analyzed for all routes in the Fairfax Connector system between January 2020 and February 2020 using CAD-AVL data (Figure 12).¹⁹ During this period, buses across the entire system arrived on-time 81.4 percent of the time, with minority routes having an average on-time performance of 79.9 percent and non-minority routes having a slightly higher average on-time performance of 83.2 percent. All of these figures fall slightly short of FCDOT's 85.0 percent on-time performance goal and there is a small difference between minority and non-minority route on-time performance.

Figure 12 On-Time Performance Monitoring – January 2020 – February 2020



Service Availability

Service availability measures the percentage of the population within the County that is served by Fairfax Connector. As shown in Table 31, 59 percent of the minority population in the County lives within walking distance (one quarter of a mile) of a local Connector bus route's alignment or walking distance (one quarter of a mile) of an express or commuter Connector bus route's stops. Table 32 also shows 49 percent of the County's non-minority population lives within walking distance of transit. Overall, the percentage of minorities within walking distance to transit services is higher than the percentage of the non-minority population. A total of 54 percent of all Fairfax County residents live within a quarter mile of a Fairfax Connector route. These figures exceed FCDOT's service availability standard of providing access to 50 percent of the County's population to the Fairfax Connector system, as measured as population within a quarter mile of a Fairfax Connector bus route. In addition to Fairfax Connector services, WMATA's Metrobus and Metrorail also serves the denser portions of the county. However, neither Metrobus nor Metrorail services are subject to the County's Title VI analysis.

¹⁹ On-time performance data was unavailable for Route 480.

Table 32 Service Availability Monitoring for Fairfax Connector Routes

Minority			Non-Minority			Total Population		
Minority Pop. Served	Minority Pop. County	% Minority Pop. Served	Non-Minority Pop. Served	Non-Minority Pop. County	% Non-Minority Pop. Served	Total Pop. Served	Total County Pop.	% Total Pop. Served
328,896	557,568	59%	289,726	585,961	49%	618,622	1,143,529	54%

3.8 Analysis of Transit Service Policies

Transit Amenities

FCDOT tracks the locations of transit amenities, i.e., shelters and benches, by stop throughout the service area. An in-depth monitoring analysis was conducted on the distribution of shelters and benches between minority and non-minority bus stops. The provision of information is distributed throughout the system per FCDOT’s established policy.

The *Fairfax County Bus Stop Guidelines*, which were first adopted in 2004 and updated in 2017, delineates the policy for installing bus shelters and benches at bus stops. It is Fairfax Connector’s practice that a bus shelter may be installed at a Fairfax Connector or Metrobus stop or station with an average of 50 or more boardings per day, and a bench may be installed at a stop or station with an average of 25 or more boardings per day.

Table 33 displays the number of shelters in Fairfax County served by either Fairfax Connector or WMATA Metrobus.

Table 34 displays the number of shelters at Fairfax Connector and Metrobus stops which were deemed eligible for receiving a shelter, based on the criteria of the stop or station having 50 or more boardings per day, by minority and non-minority designation. For the purposes of this analysis, a bus stop or station received a "minority" designation if located in a Census Block Group where the minority population is at or exceeds the proportion of minorities (48.7%) that comprise the total population. Of the 188 transit stops and stations across Fairfax County that were eligible for a shelter, the distribution of shelter was approximately even across minority and non-minority stops and stations, with 28.8 percent of eligible minority stops receiving a shelter and 28.6 percent of eligible non-minority stops receiving a shelter.

Other bus stops with shelters or benches exist in the Connector service area that are not included in this analysis, as they are not deemed eligible as described above. The County regards these as legacy amenities. These amenities were typically constructed prior to the adoption of the bus stop guidelines. As these legacy amenities reach the end of their useful lives, Fairfax Connector staff will re-evaluate whether or not to replace them, according to the adopted criteria.

Table 33 Shelter Availability among Fairfax Connector and Metrobus stops and stations which are eligible for a shelter (50 and greater daily boardings)

	Minority Stops/ Stations (Number)	Non-Minority Stops/ Stations (Number)	Total Stops/Stations (Number)
No Shelter	104	30	134
Shelter	42	12	54
Total	146	42	188
Percent of stops with a shelter	28.8%	28.6%	28.7%

In Fairfax County, three potential ways exist for a shelter to be installed: 1) directly through the County-funded shelter program, 2) by an advertising vendor that provides shelters, and 3) through developer proffers associated with development approvals. Among the shelters provided by the shelter advertising vendor, FCDOT has discretion to place 10 percent of the shelters procured through this contract. The remaining 90 percent of these shelters are located by the advertising vendor, on the basis of high ad-revenue locations. The advertising vendor is responsible for the maintenance and upkeep of all shelters that they install. County-owned shelters are maintained by the Stormwater Maintenance department as their funding allows. *Figure 13* shows the system-wide distribution of transit amenities. *Figure 14* shows the most recent transit facility improvements in Fairfax County.

Figure 13 Distribution of Transit Amenities

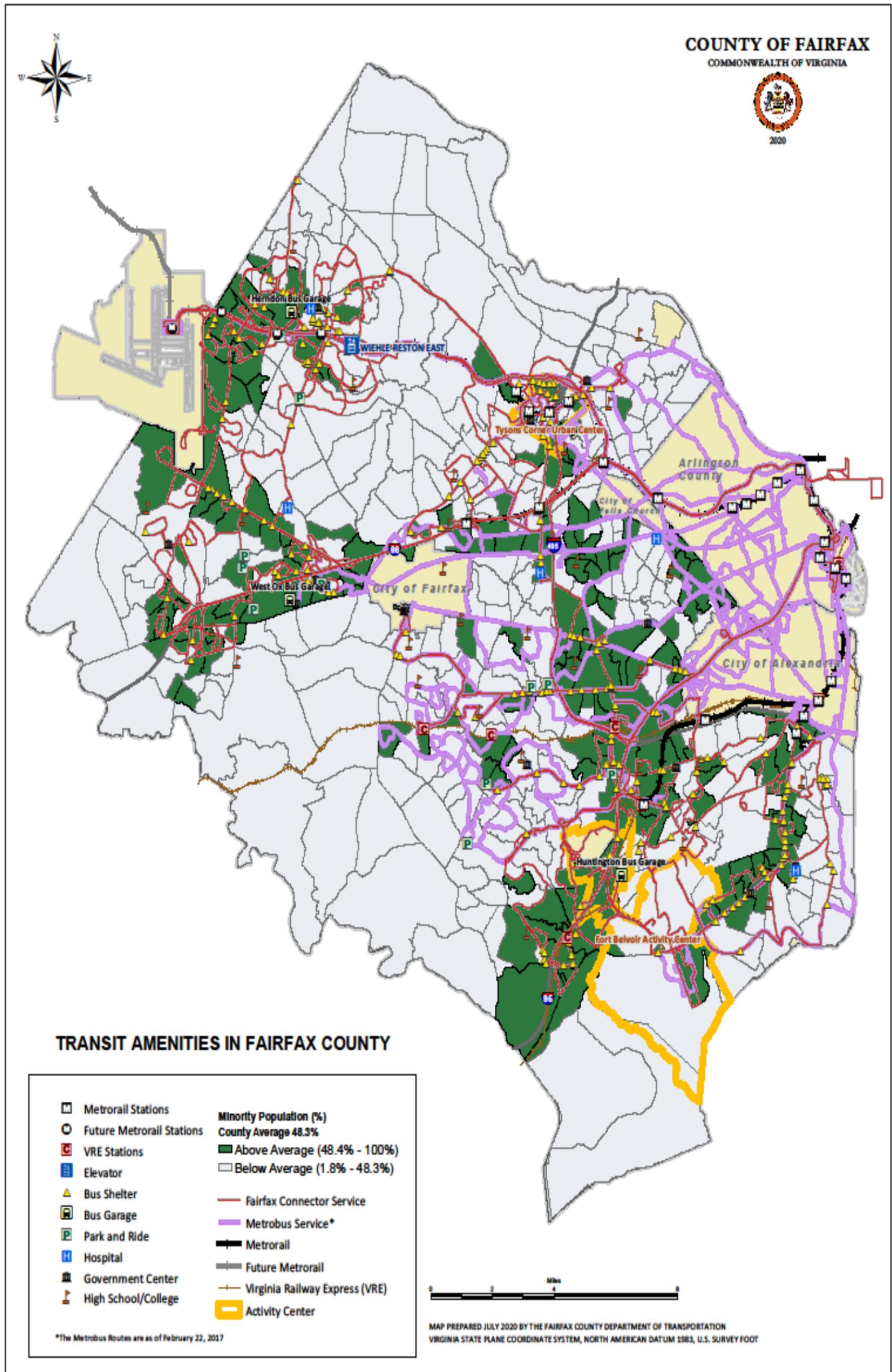
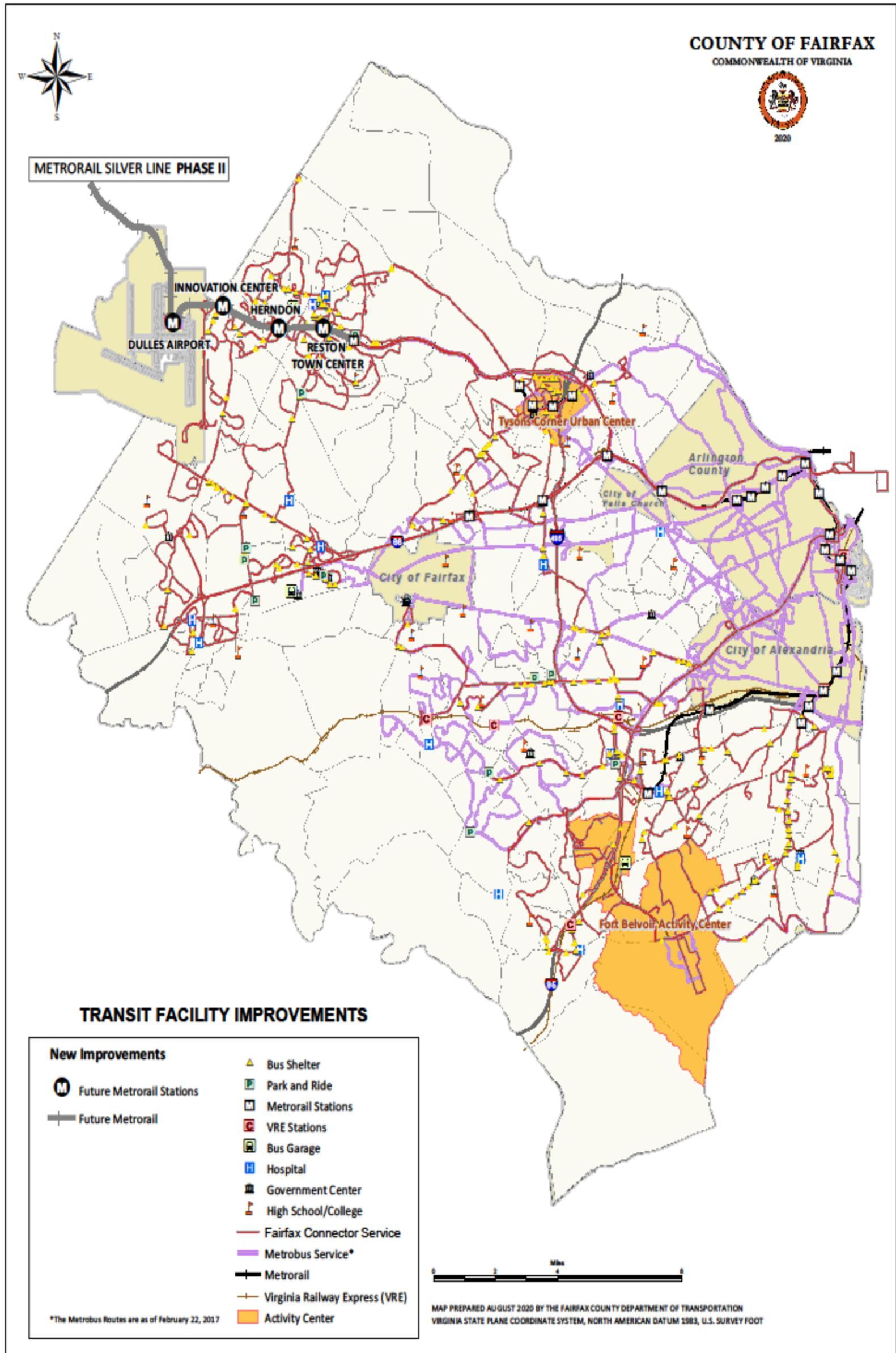


Figure 14 Recent Transit Facility Improvements



In addition to the map, an in-depth monitoring analysis was conducted on the distribution of bus shelters. It is Fairfax Connector’s practice that a bus shelter may be installed at stops or stations with an average of 50 or more boardings per day.

Table 34 displays the results for the bench distribution analysis. In Fairfax County, 200 stops or stations were eligible to receive a bench based on Fairfax County’s ridership threshold for bench placement (daily boardings between 25 and 50) that did not already have a shelter. Twenty-nine of the 199 stops or stations that were eligible for a bench had seating through a bench or shelter. In most cases, benches were allocated to stops below the ridership threshold, which are not represented in the table below. FCDOT will examine its bench distribution at non-eligible stops to look for ways to allocate more benches to eligible stops.

Table 34 Bench Availability among Fairfax Connector and Metrobus Stops and Stations that are Eligible for a Bench (daily boardings are between 25 and 50)

	Minority Stops/Stations(Number)	Non-Minority Stops/Stations(Number)	Total Stops/Stations (Number)
No Bench	113	51	164
Bench	20	9	29
Total	133	60	193
Percent of stops with a bench	15.0%	15.0%	15.0%

Vehicle Assignment

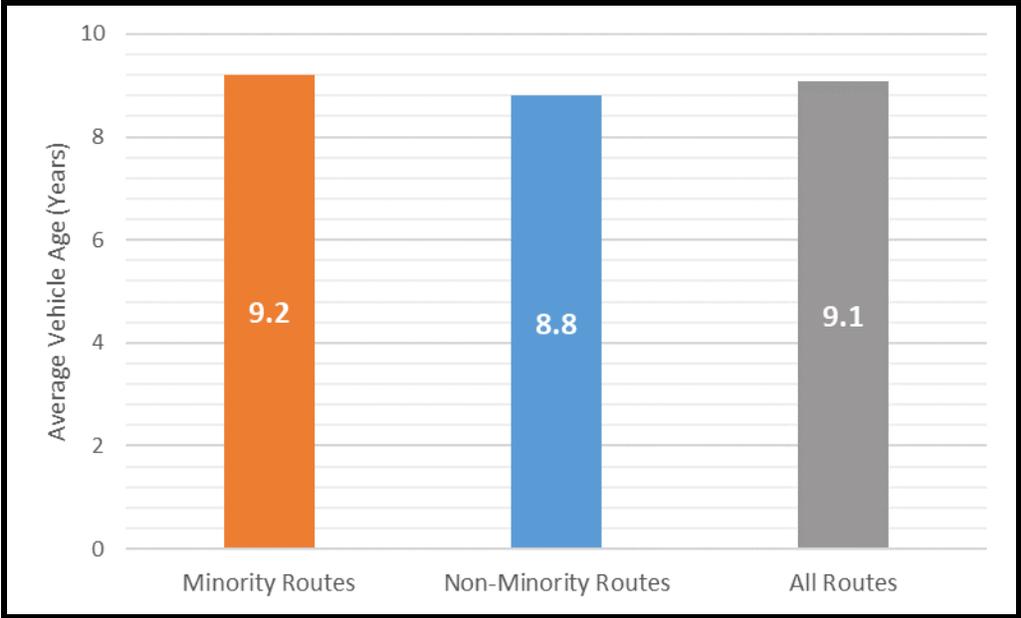
FCDOT generally assigns Fairfax Connector vehicles to routes from three operating divisions as follows: North County service area (Reston-Herndon Division), Central service area (West Ox Division), and South County service area (Huntington Division). Specific bus types and sizes from each operating division are assigned to routes based on the capacity needed for each route and road or service area geometry. For example, Fairfax Connector only uses 30-foot buses on RIBS routes in Reston. However, most routes will have several different makes, sizes, and ages of buses operating the route at any given time. This flexibility is needed due to the fact that different buses may be available on a daily basis to maintenance schedules.

Since the introduction of FCDOT’s CAD-AVL system, records are maintained on which specific buses are used on which routes for every run. An analysis of all vehicles used on all routes for the week of January 3 - January 9, 2020 was conducted to evaluate average vehicle age.

Figure 15 shows that there is essentially no difference in age between vehicles operating on minority routes, and those operating on non-minority routes, with both having a vehicle age average of 9 years. The average age of all Fairfax Connector vehicles is also 9 years.²⁰

²⁰ Vehicle assignment data was missing for Routes 396, 480, and RIBS 1 - 5.

Figure 15 Average Vehicle Age – January 3-9, 2020



APPENDIX A: SAMPLE FAIRFAX COUNTY TITLE VI ACCOMPLISHMENT QUESTIONNAIRES

**Fairfax County Title VI Accomplishments Questionnaire
For
Communications and Marketing**

Prepared by:

**Fairfax County Department of Transportation
*Coordination and Funding Division***

BACKGROUND

Fairfax County's Title VI (Civil Rights) Program was adopted by the Board of Supervisors and approved by the Federal Transit Administration (FTA) in 2017. As part of the County's Title VI Program, the Fairfax County Department of Transportation (FCDOT) has committed to update its Language Access Plan (LAP), as well as monitor related activities that may have occurred. To create this update, Coordination and Funding Division staff collects data from FCDOT through the questionnaire below.

Each division is asked to identify **accomplishments, issues, and any corrective actions** that have occurred during the past year. If a question does not apply to your section or work, *there is no need to respond*.

Please return completed questionnaires to **Benjamin Atsem** (Benjamin.Atsem@fairfaxcounty.gov) in Coordination and Funding by **April 1, 2020**.

Accomplishments

Public Outreach/Communications

1. Identify the number of public hearings held and describe efforts to ensure broad citizen participation in the hearings, particularly by minorities and women.
2. Describe minority individuals, groups, and organizations that participated in the hearings, including efforts to involve them.
3. List the special language services provided – note the professional language service provided including the name of the service, date provided, and the number of persons served, and any other relevant information during public hearing or meetings held.
4. Were Fairfax County Title VI policy statements available for use in these public meetings and hearings?
5. Describe this year's Title VI accomplishments with regard to promotional materials, including news releases, advertising, brochures, flyers on buses, etc.
6. What have proven to be the most effective ways to connect with current system users and to reach specific Title VI segments of the community within Fairfax County and the general public at large?
7. Describe coordination activities with other organizations such as social service agencies and schools to further the County's Title VI program.

Problem Areas/Issues

1. Over the past 12 months, describe any significant Title VI issues that have arisen, actions taken, and issues that still need to be addressed.
2. Provide a summary of any Title VI concerns and/or issues, if any, raised by representatives of minority communities during the past year.
3. How were you notified of those concerns/issues?
4. Were there any Title VI concerns or issues raised at public hearings?
5. Were any Title VI concerns or issues raised in relation to relocation assistance and/or payments?

Corrective Actions

1. Were any corrective actions were initiated in the past year as a result of Title VI issues? If yes, please explain.
2. Describe actions taken by the division to facilitate and/or address any Title VI concerns (or potential concerns).

**Fairfax County Title VI Accomplishments Questionnaire
For
Planning**

Prepared by:

Fairfax County Department of Transportation
Coordination and Funding Division

BACKGROUND

Fairfax County's Title VI (Civil Rights) Program was adopted by the Board of Supervisors and approved by the Federal Transit Administration (FTA) in 2017. As part of the County's Title VI Program, the Fairfax County Department of Transportation (FCDOT) has committed to update its Language Access Plan (LAP), as well as monitor related activities that may have occurred. To create this update, Coordination and Funding Division staff collects data from FCDOT through the questionnaire below.

Each division is asked to identify **accomplishments, issues, and any corrective actions** that have occurred during the past year. If a question does not apply to your section or work, *there is no need to respond*.

Please return completed questionnaires to **Benjamin Atsem** (Benjamin.Atsem@fairfaxcounty.gov) in Coordination and Funding by **April, 2020**.

Accomplishments

Planning

1. Describe any research, studies, or surveys conducted during the past year that collected data on minority persons, low-income neighborhoods, income levels, physical environments, and travel habits for the purposes of Title VI compliance.
2. Describe any strategies or actions taken to promote Title VI compliance with regard to planning activities, including monitoring and review processes, and their outcomes and status.

Problem Areas/Issues

1. Over the past 12 months, describe any significant Title VI issues that have arisen, actions taken, and issues that still need to be addressed.
2. Provide a summary of any Title VI concerns and/or issues, if any, raised by representatives of minority communities during the past year.
3. How were you notified of those concerns/issues?
4. Were there any Title VI concerns or issues raised at public hearings?
5. Were any Title VI concerns or issues raised in relation to relocation assistance and/or payments?

Corrective Actions

1. Were any corrective actions were initiated in the past year as a result of Title VI issues?
If yes, please explain.
2. Describe actions taken by the division to facilitate and/or address any Title VI concerns
(or potential concerns).

APPENDIX B: MAPS OF LINGUISTICALLY ISOLATED POPULATIONS IN FAIRFAX COUNTY BY LANGUAGE

Map Note: All the maps were prepared using the U.S. Census Bureau, American Community Survey, 2014-2018 five-year estimates, data. Linguistically isolate populations were identified as those who speak English less that “very well”. Data was analyzed at the tract level of Census geography.

These maps indicate that current transit routes traverse areas with relatively high concentrations of linguistically isolated Chinese, Korean, Spanish, and Vietnamese speakers. In general, census tracts with linguistically isolated households are clustered around transit, including not only Fairfax Connector but also service provided by WMATA.

Figure B.1: Concentration of Linguistically Isolated Households (Percent of Total)

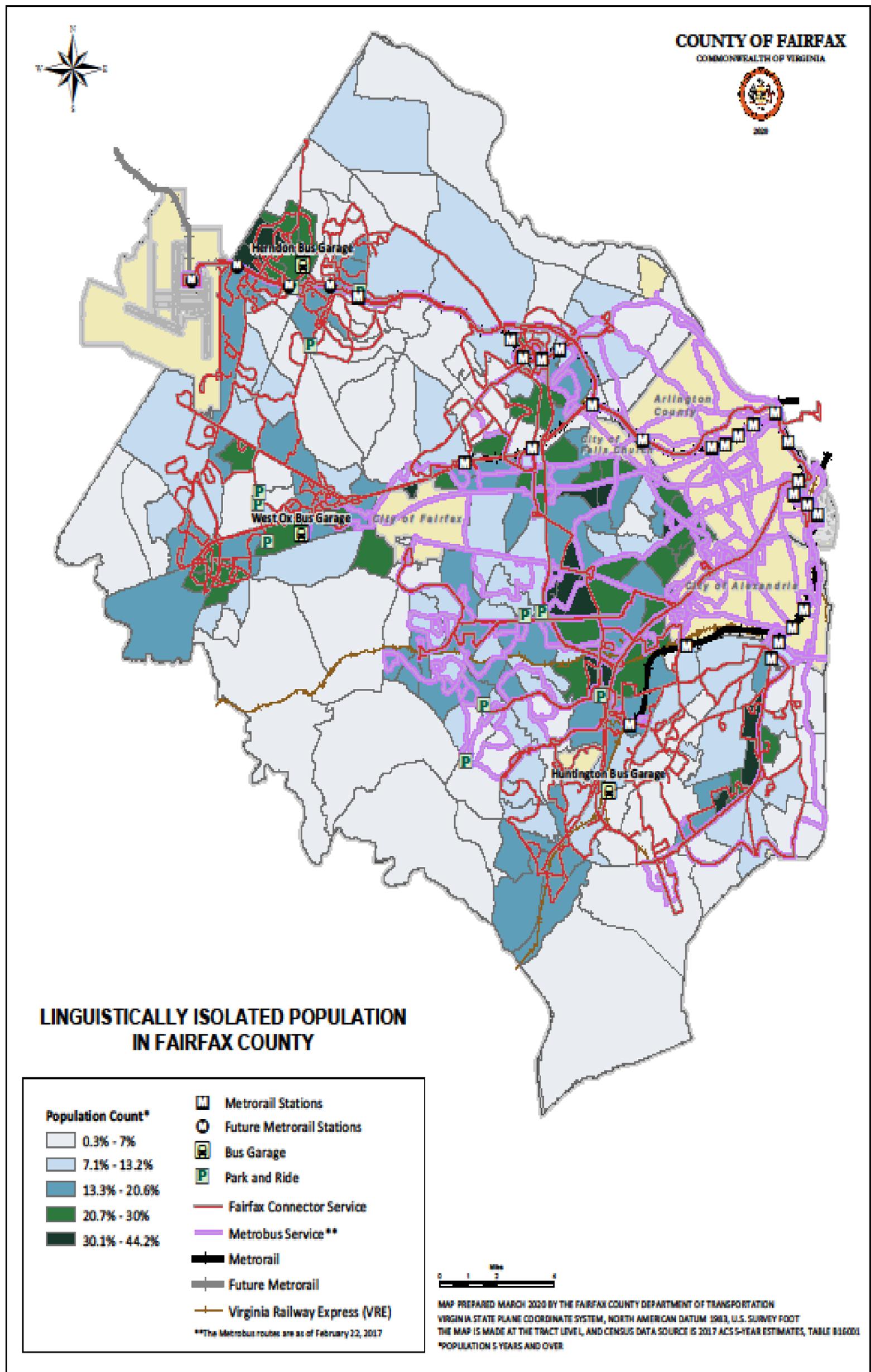


Figure B.2: Linguistically Isolated Households in Fairfax County – Spanish

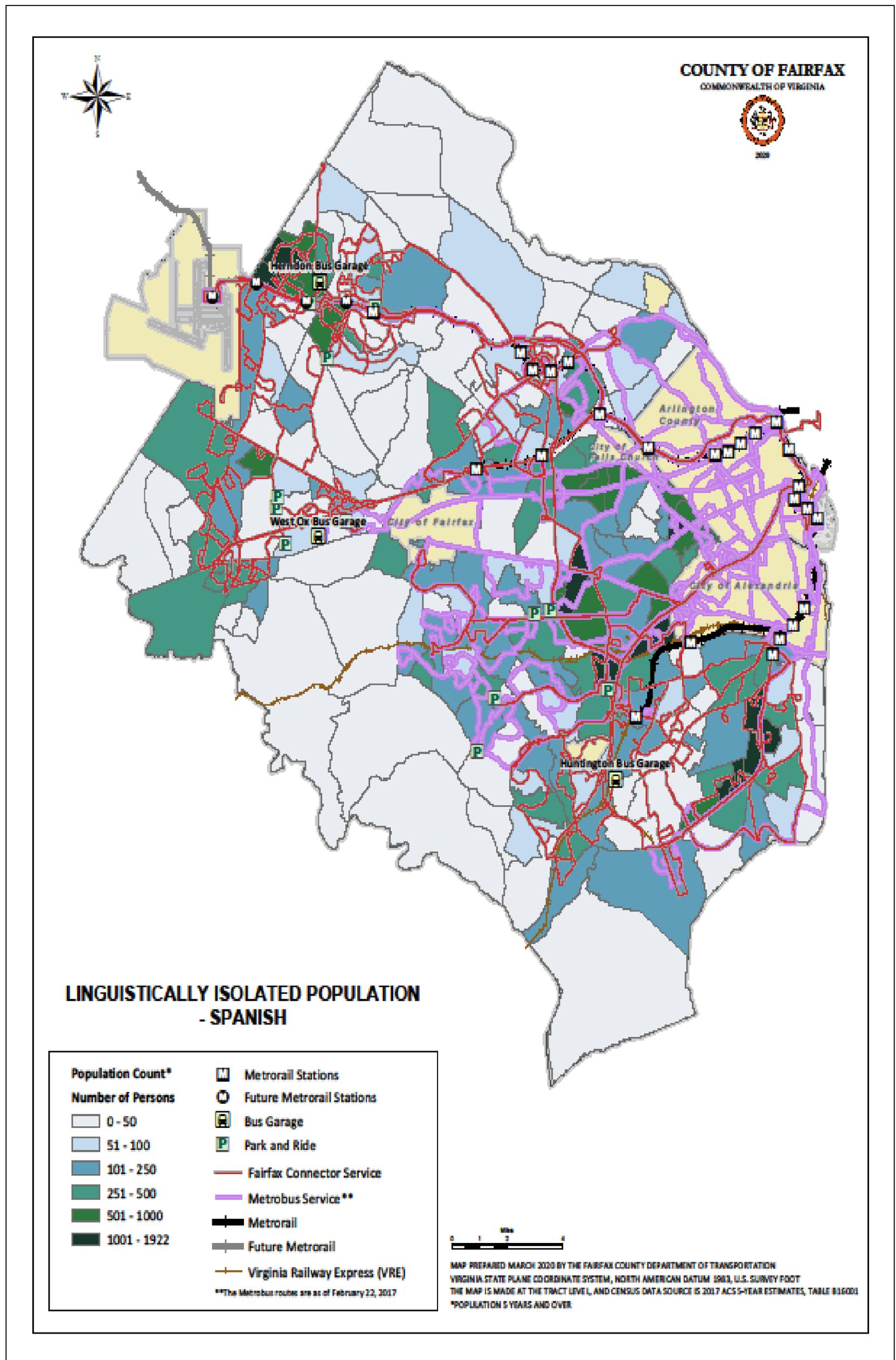


Figure B.3: Linguistically Isolated Households in Fairfax County – Korean

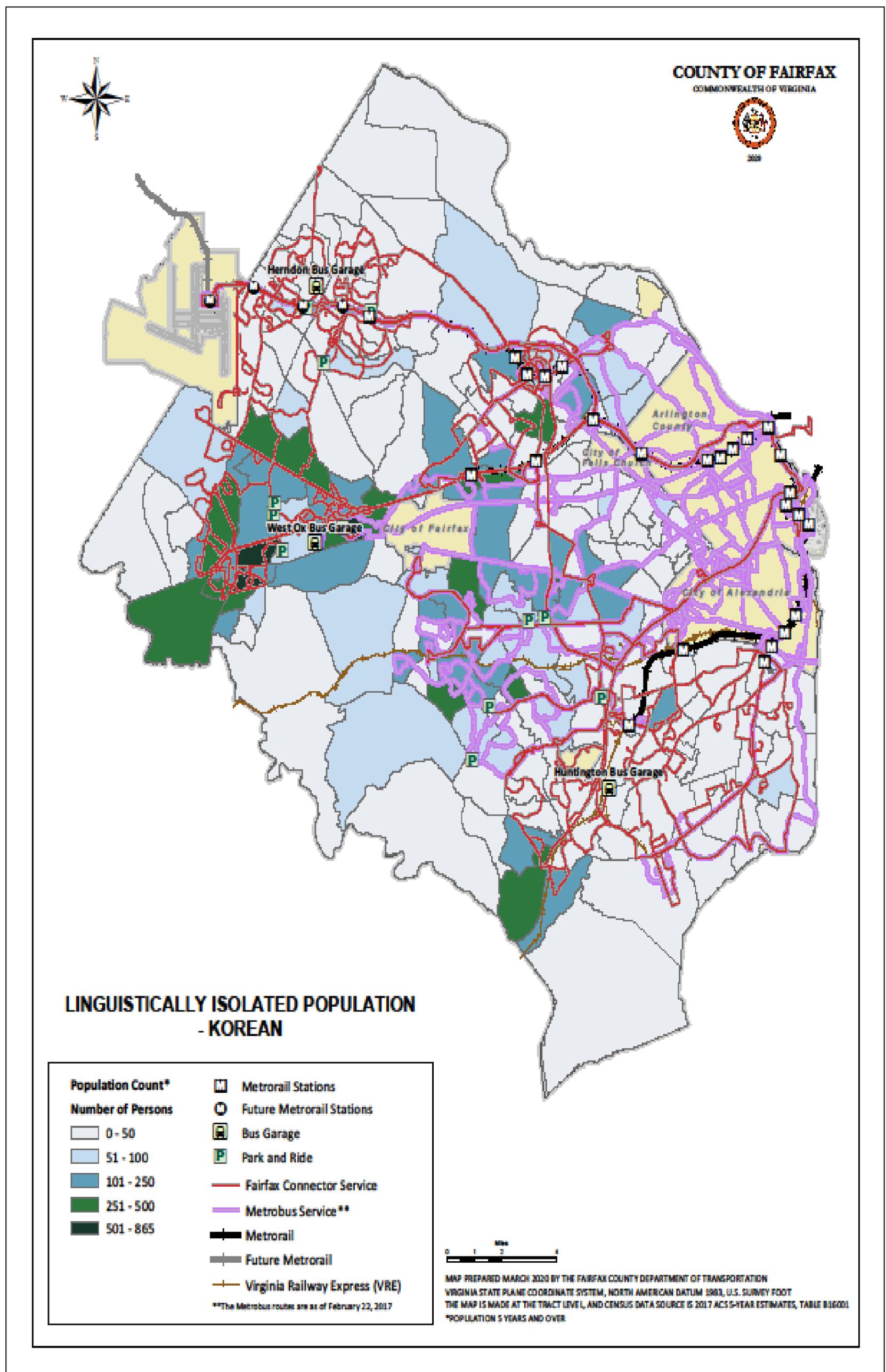


Figure B.4: Linguistically Isolated Households in Fairfax County – Vietnamese

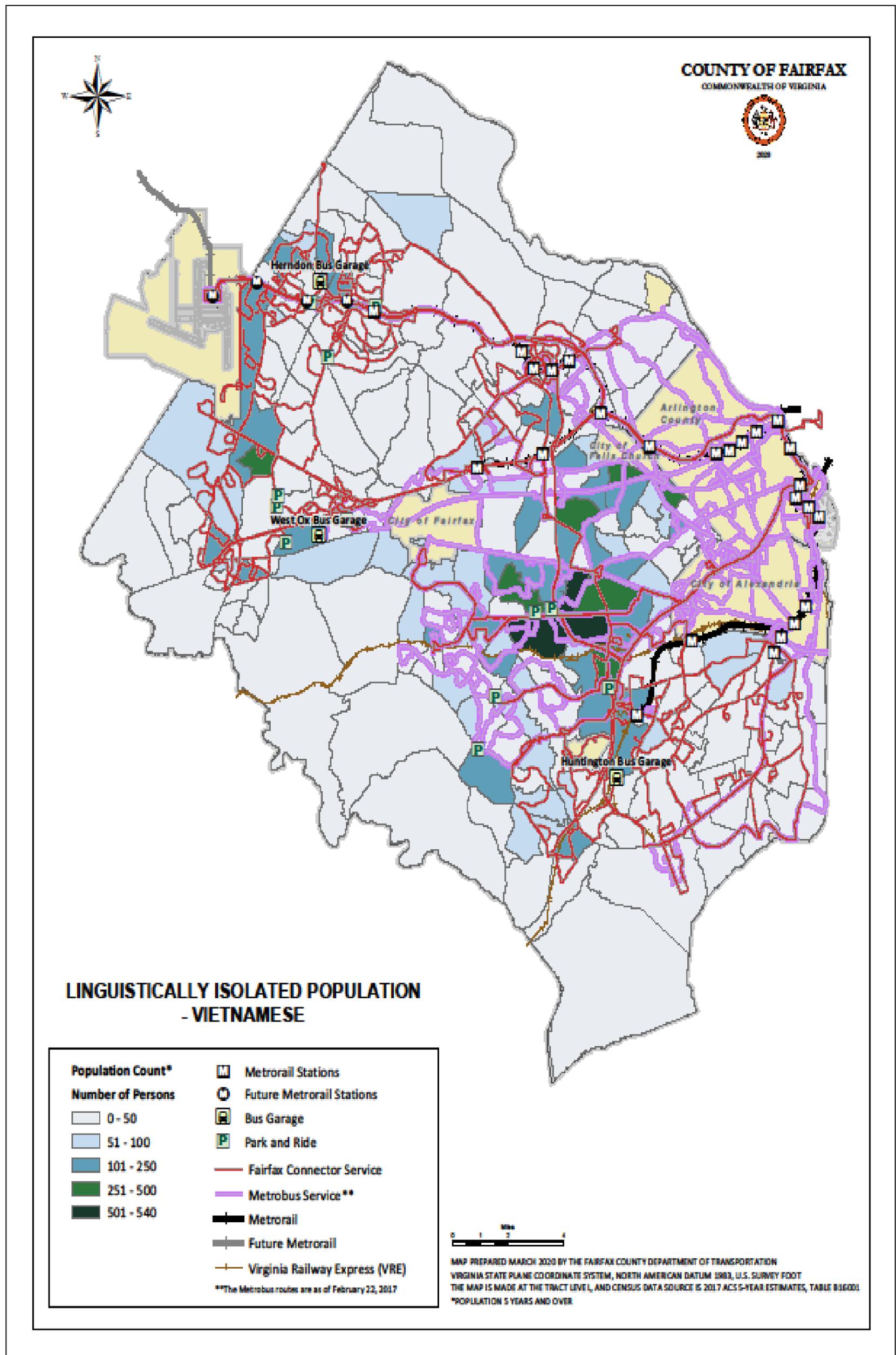


Figure B.5: Linguistically Isolated Households in Fairfax County – Chinese

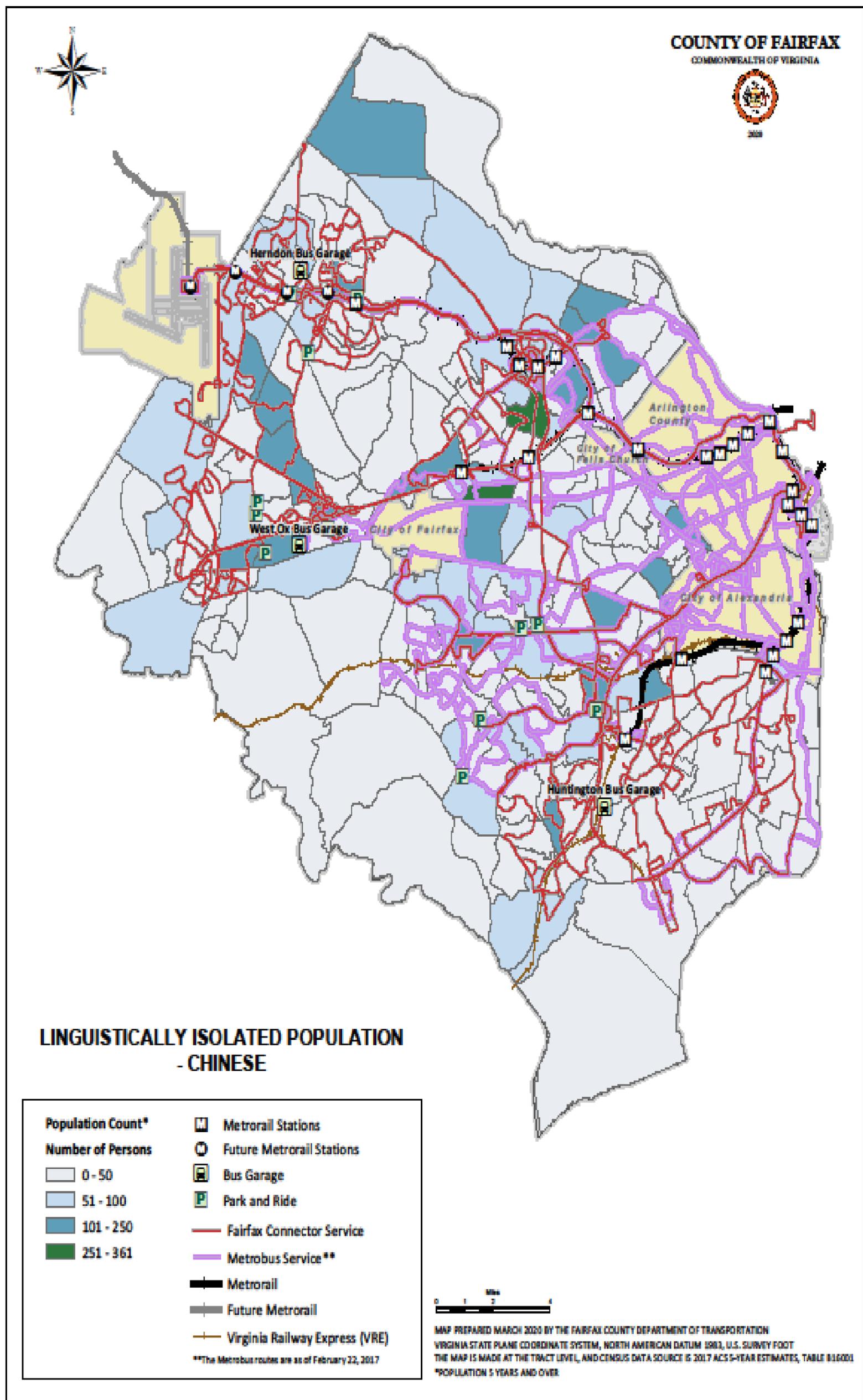


Figure B.6: Linguistically Isolated Households in Fairfax County – Hindi

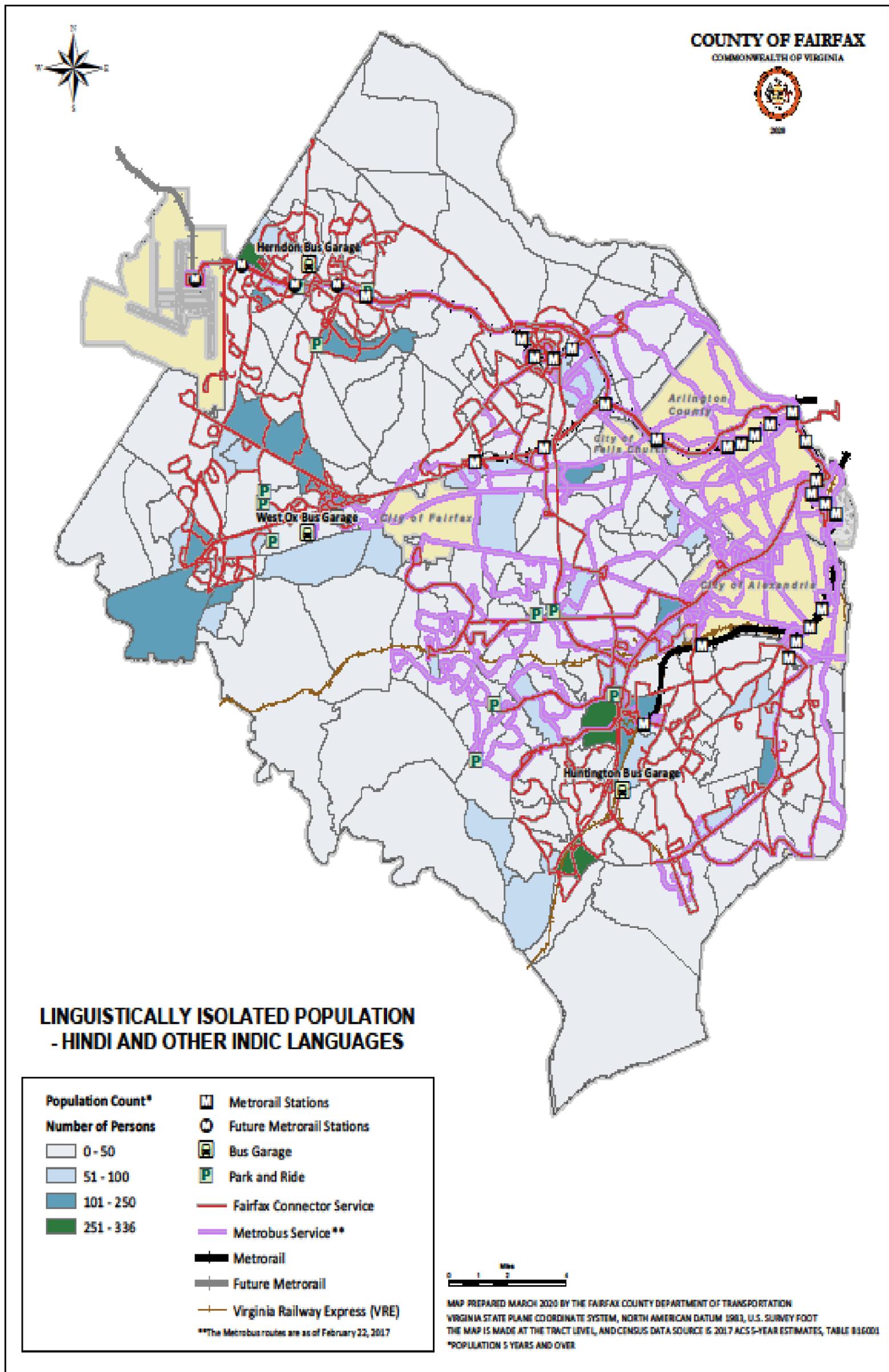


Figure B.7: Linguistically Isolated Households in Fairfax County – Arabic

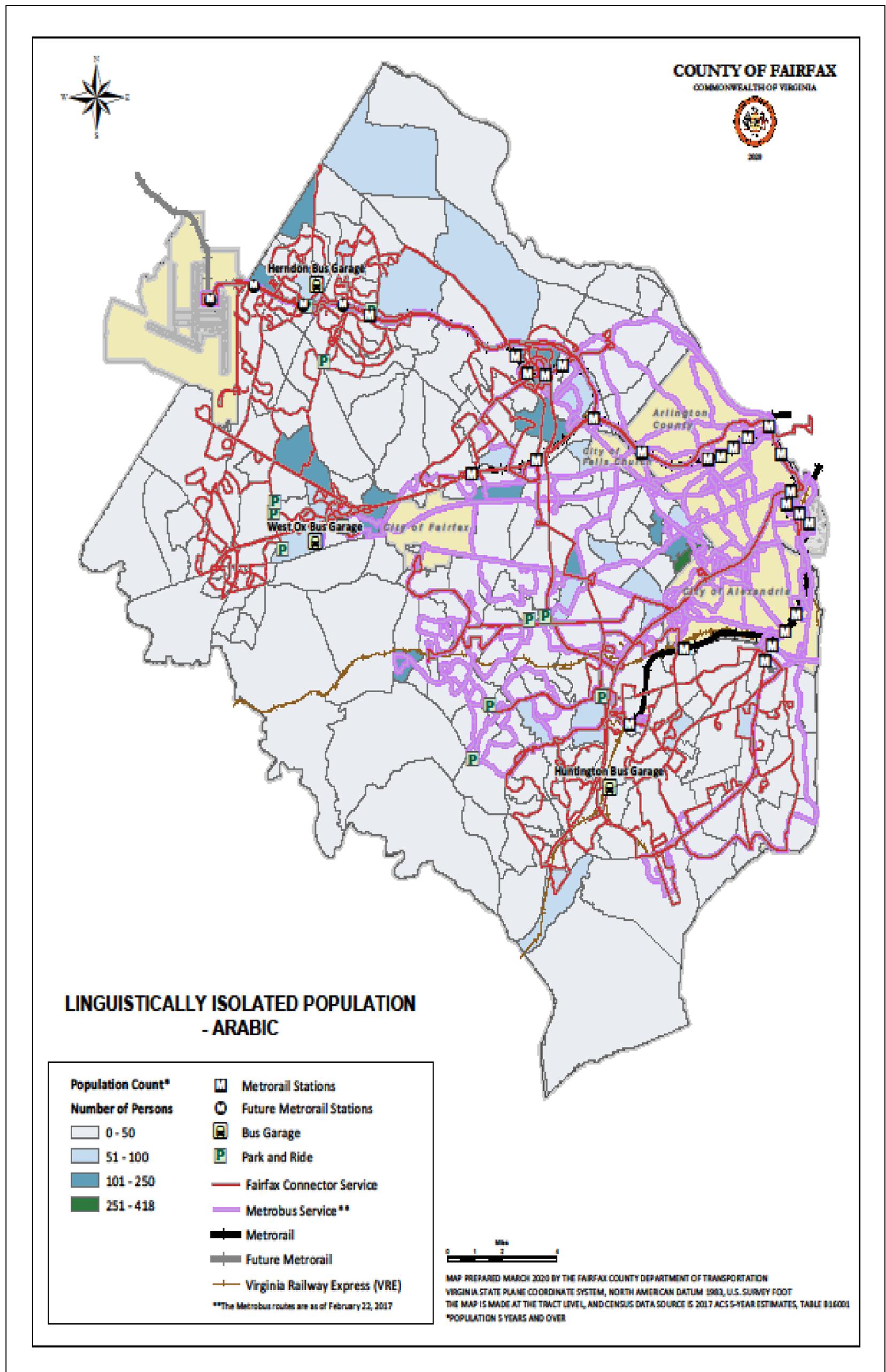


Figure B.8: Linguistically Isolated Households in Fairfax County – African Languages

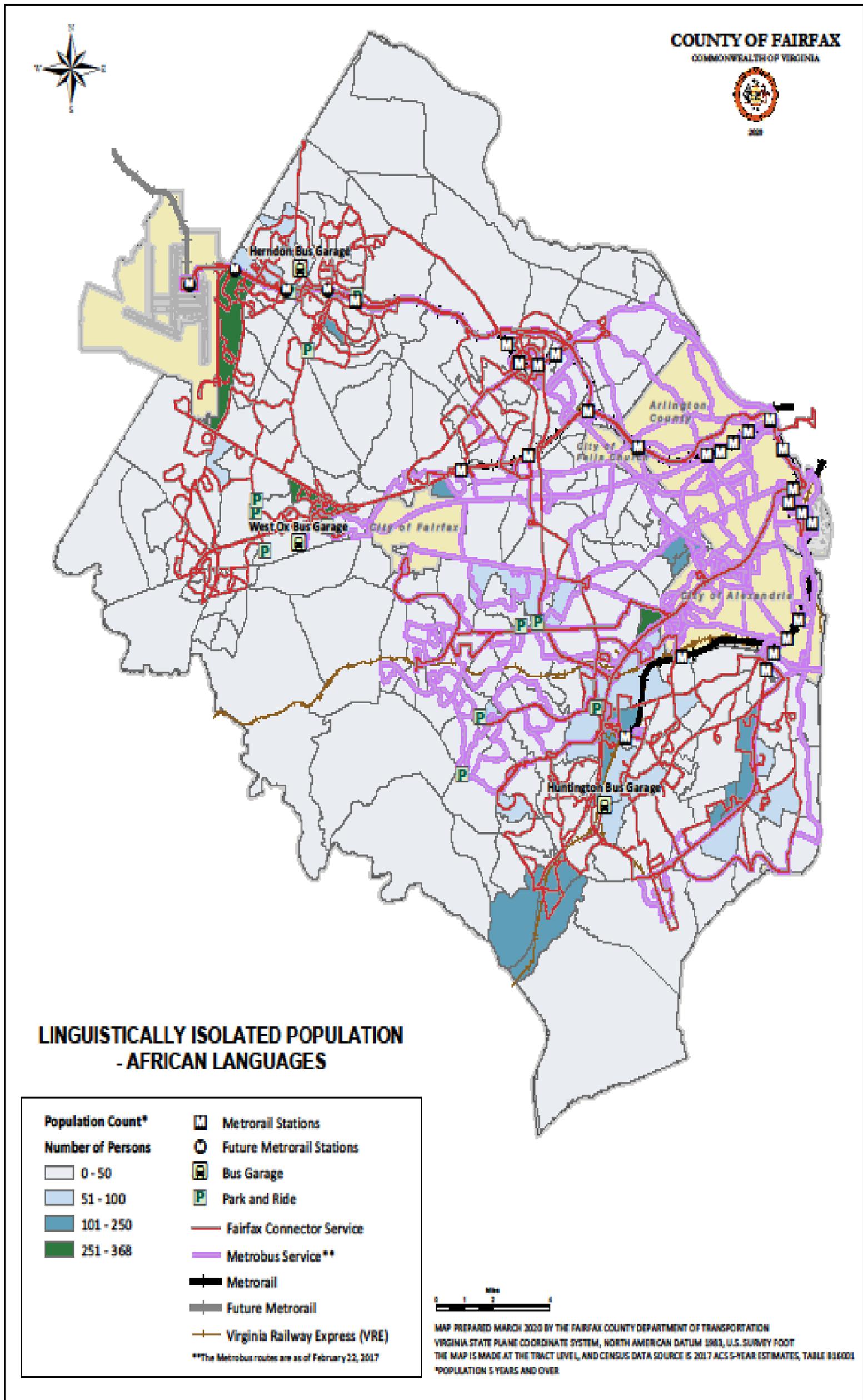


Figure B.9: Linguistically Isolated Households in Fairfax County – Farsi

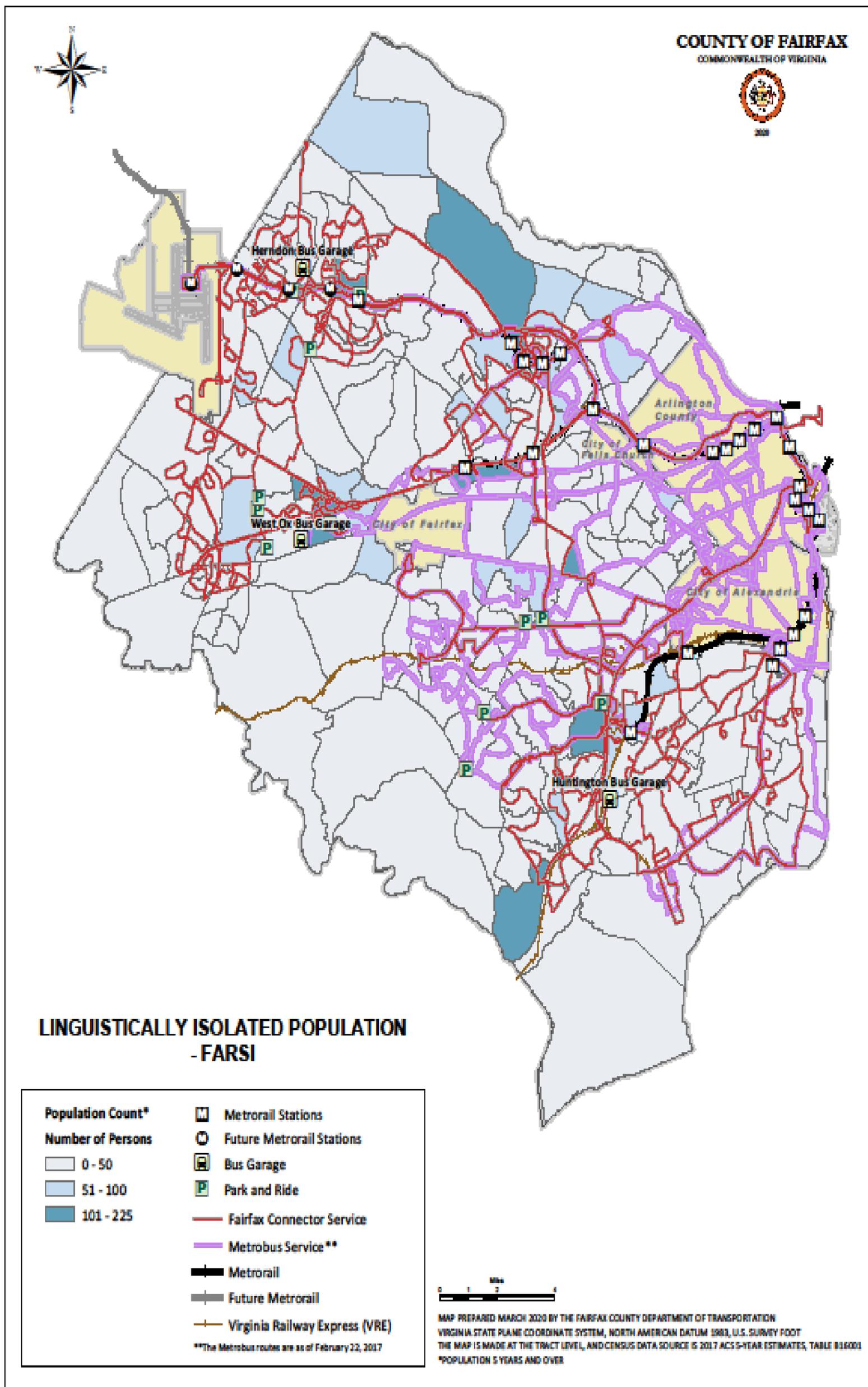


Figure B.10: Linguistically Isolated Households in Fairfax County – Urdu

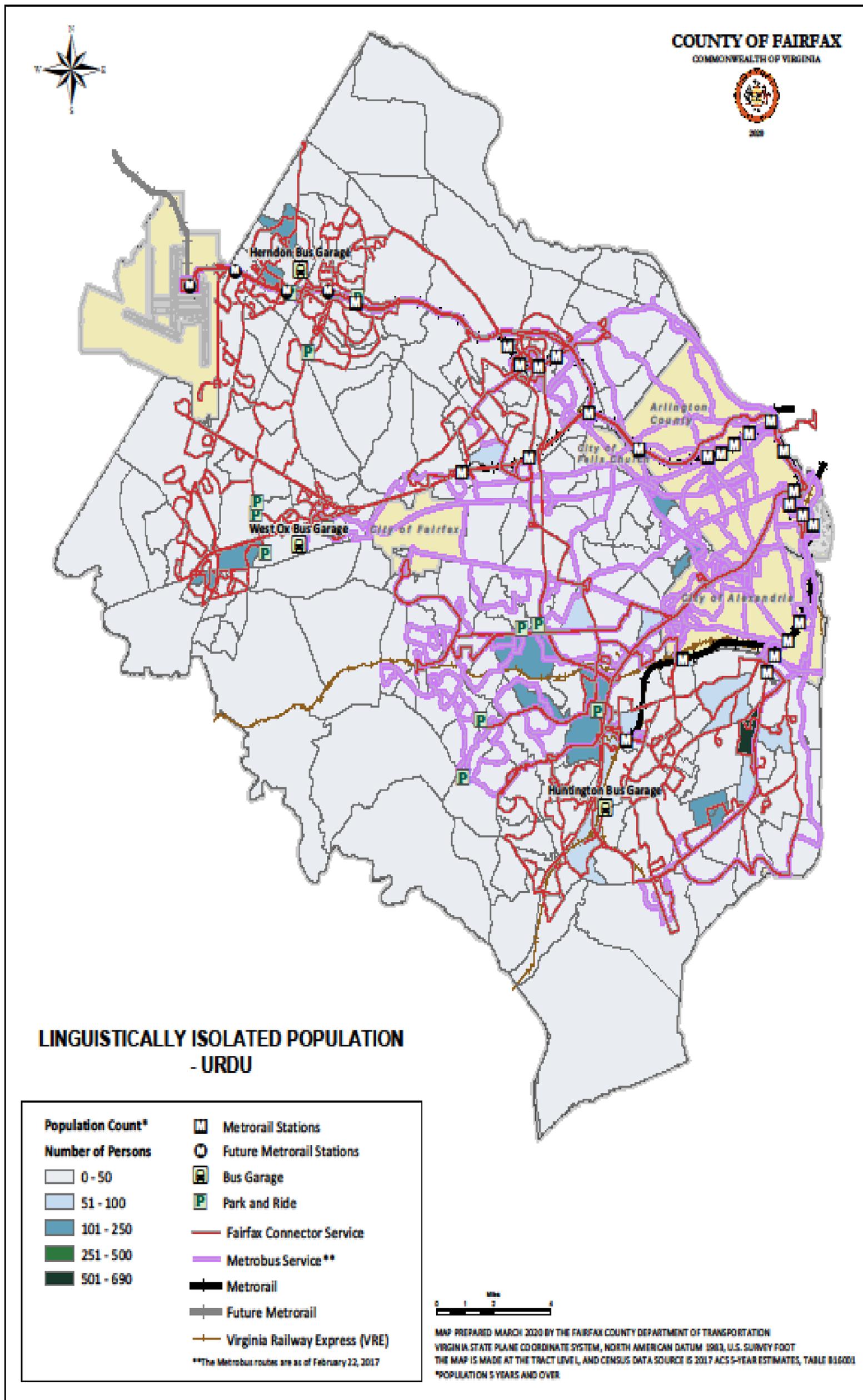


Figure B.11: Linguistically Isolated Households in Fairfax County – Tagalog

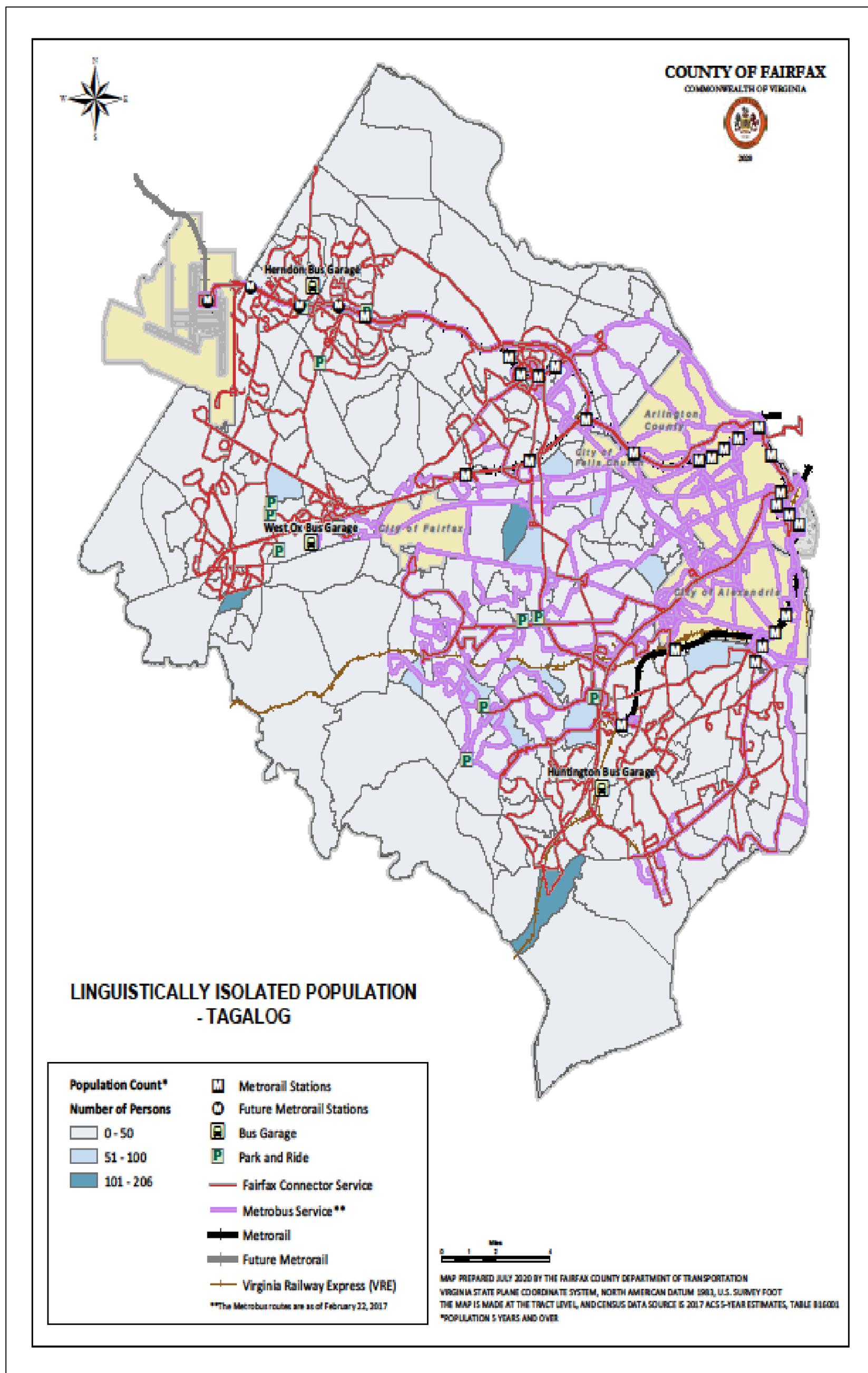
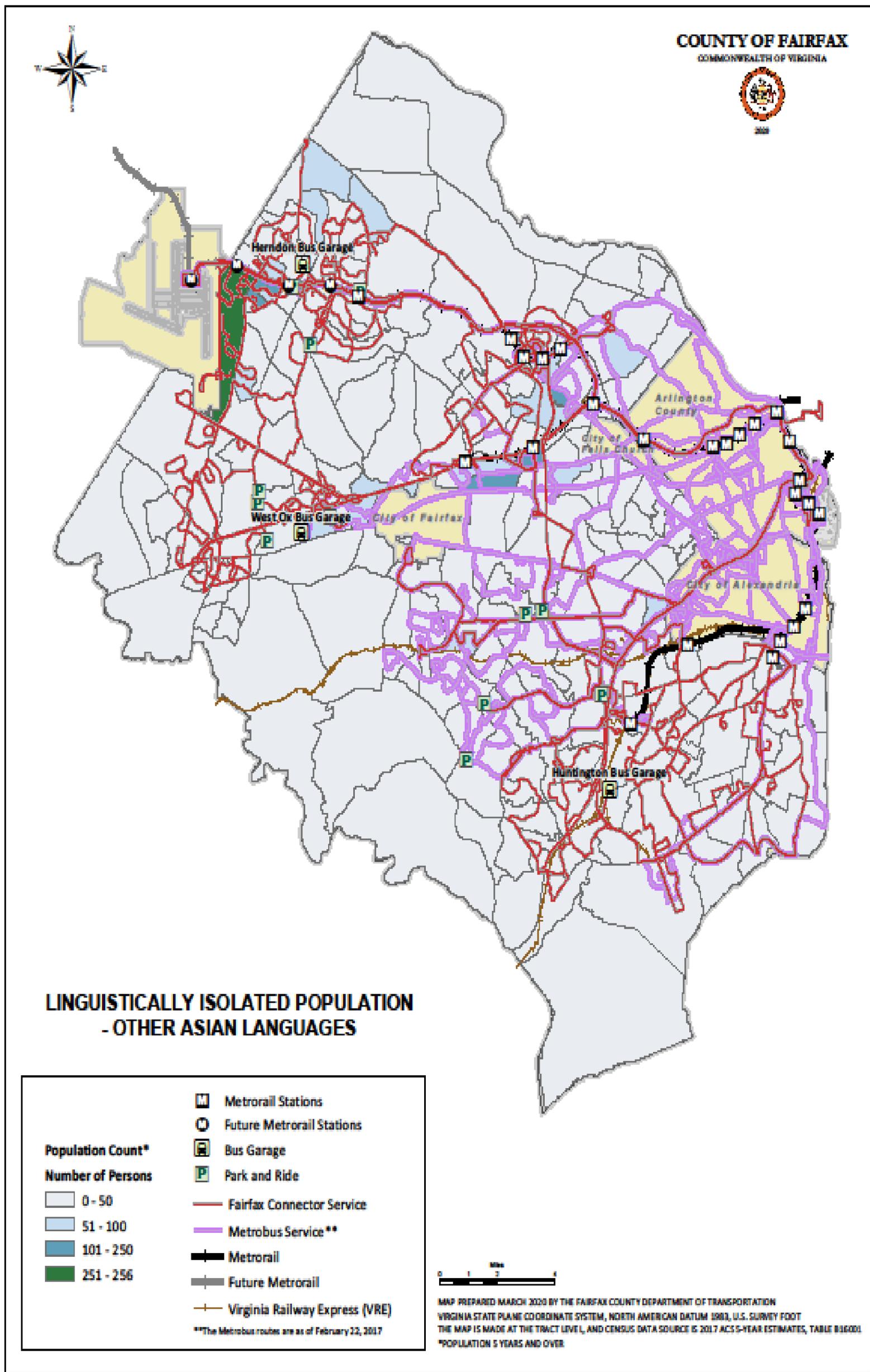


Figure B.12: Linguistically Isolated Households in Fairfax County – Other Asian Languages



APPENDIX C: POWERPOINT PRESENTATION: DISPARATE IMPACT, DISPROPORTIONATE BURDEN AND MAJOR SERVICE CHANGE PROPOSED POLICIES



County of Fairfax, Virginia

Major Service Change and Disparate Impact/ Disproportionate Burden Policies

Fairfax County Department of
Transportation 2020 Title VI
Program Update



County of Fairfax, Virginia

Agenda

- Introductions & Icebreaker
- Zoom Tips
- Purpose of Today's Focus Group
- Overview of Title VI
- What is a Major Service Change (MSC) Policy?
- FCDOT's MSC Policy
- What is a Disparate Impact/Disproportionate Burden (DI/DB) Policy?
- FCDOT's DIDB Policy
- General Discussion about FCDOT Transit

June 2020 Department of Transportation 2





Introductions

- Your name
- What organization you work for
- How do the people you represent use Fairfax Connector services? Are there specific routes or destinations that are particularly important to them?



Tips for Using Zoom

Mute button:
Please remember to mute yourself when not speaking to the group



Chat button:
Use this to submit questions or comments to the group if you don't want to interrupt





Purpose

- Assist FCDOT in determining proposed policies and thresholds for Major Service Change, Disparate Impact and Disproportionate Burden
- Gain knowledge of Title VI of Civil Rights Act and how it impacts transit service planning
- **NOTE:** When responding to questions and providing comment, think about it from the perspective of the constituents you serve.



Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964 states:

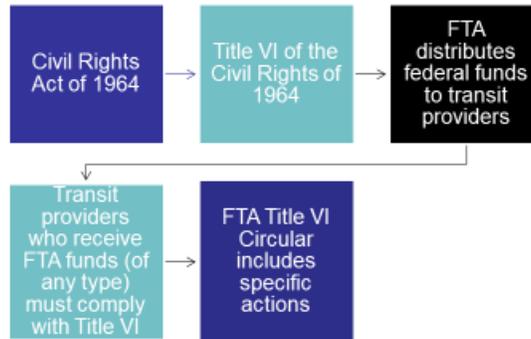
"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."



History – Federal Civil Rights Laws

Civil Rights Act Titles

- o Title I – Voting Rights
- o Title II – Public Accommodation
- o Title III – Public Facilities
- o Title IV – Public Education
- o Title V – Civil Rights Commission
- o **Title VI – Federally Assisted Programs**
- o Title VII – Equal Employment
- o Title VIII – Voter Registration
- o Title IX – Civil Rights Court Cases
- o Title X – Community Relations
- o Title XI - Miscellaneous



What Does This Mean?

- Public transportation providers that receive federal funds are required to submit an updated Title VI Program to FTA every three years
- Transit providers must document that they are not discriminating based on race, ethnicity, or national origin, as well as the proactive steps they are taking to ensure they do not discriminate in the future

Key Documents & Policies

- Language Access Plan
- Public Participation Plan
- Service Standards and Monitoring
- Major Service Change Policy
- Disparate Impact / Disproportionate Burden Policy

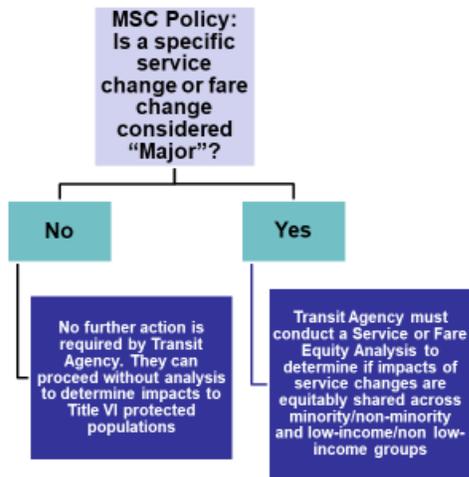




What is a Major Service Change (MSC)?

The **Major Service Change (MSC) Policy** is a defined measure by which a transit agency determines if a change is significant or “major” enough to warrant further analysis

This is a **Service or Fare Equity Analyses**



What is a Major Service Change (MSC)?

- Agencies are allowed to set their own Major Service Change policies
- Major Service Change policies often include modifications to:
 - Service availability (hours and/or service days)
 - Service quantity (frequency and/or revenue miles/hours)
 - Geographic alignments (routes)
 - Fares (any change)
- Changes can be *adverse* or *non-adverse* meaning that adding service or reducing service can be a major service change
- Transit providers are required to revise and conduct outreach on policies with every Title VI Program update





Major Service Change Exemptions

- **Seasonal Service Changes:**
Adding or removing a route or trips due to seasonal demand; must happen in cycles annually
- **Pilots or Demonstration Routes:**
Creation, modification, or discontinuation of a demonstration route within the first 12 months of operation
- **Temporary Service Changes:**
Diversions, frequency changes, or span modifications due to local events, construction, weather, and emergencies



FCDOT Major Service Change Policy

“A major service change is defined as either an increase or a decrease of 25 percent or more in either daily revenue service hours, revenue service miles, or both for the individual route being modified.”

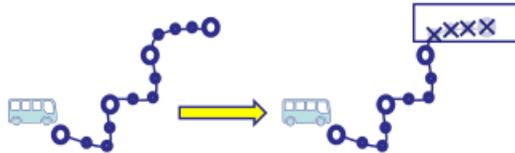
- **Key Definitions:**
 - *Daily Revenue Service Hours:* The number of hours a bus operates while carrying paying passengers.
 - *Revenue Service Miles:* The number of miles a bus operates while carrying paying passengers.



FCDOT Major Service Change Policy

“A major service change is defined as either an increase or a decrease of 25 percent or more in either daily revenue service hours, revenue service miles, or both for the individual route being modified.”

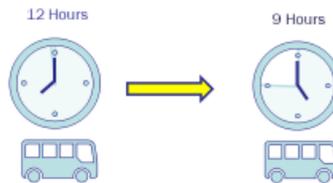
Example 1: A bus that had operated a 12-mile route is shortened, so the route is now only 9 miles.



FCDOT Major Service Change Policy

“A major service change is defined as either an increase or a decrease of 25 percent or more in either daily revenue service hours, revenue service miles, or both for the individual route being modified.”

Example 2: A bus route that had operated from 8:00 AM to 8:00 PM with a single vehicle (12-hours of service per day) will now operate from 8:00 AM to 5:00 PM (9-hours of service per day).





Poll Question

- Add in policy description Does this major service change policy meet the needs of the people you represent?

DISCUSSION



Major Service Change Equity Evaluations

- Every Major Service Change requires a **Service Equity Analysis**
 - Changes can have a **Disparate Impact (DI)** on minority riders
 - Changes can have a **Disproportionate Burden (DB)** on low-income riders
- **DI/DB Policies** help determine when a Major Service Change creates these inequities





Disparate Impact/Disproportionate Burden Definitions

Disparate Impact

A policy that appears neutral whose impacts affect racial, ethnic, or national origin groups in a substantially non-neutral way.

Can be *positive* or *negative*:

- **Negative:** Service changes that **take away service** disproportionately used by minority communities OR **fare/fare media changes** that disproportionately negatively impact minority communities
- **Positive:** Service changes that **add service** disproportionately used by non-minority communities OR **fare/fare media changes** that disproportionately benefit non-minority communities

Disproportionate Burden

A policy that appears neutral that impacts low-income populations far more than non low-income populations.

Can be *positive* or *negative*:

- **Negative:** Service changes that **take away service** disproportionately used by low-income communities OR **fare/fare media changes** that disproportionately negatively impact low-income communities
- **Positive:** Service changes that **add service** disproportionately used by non low-income communities OR **fare/fare media changes** that disproportionately benefit non low-income communities



Determining a DI or DB

- How much will a service change impact **minority** populations relative to **non-minority** populations?
- How much will a service change impact **low-income** populations relative to **non low-income** populations?
- **Percentage thresholds** determine what counts as a Disparate Impact or Disproportionate Burden
 - Thresholds are added or subtracted based on whether a change is *adverse* or *non-adverse*
 - Federal guidance: transit provider thresholds should be “tripped” sometimes



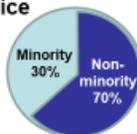


DI/DB Thresholds: Examples

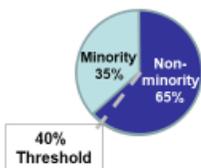
Example 1: Adverse Change

- Service area is **30% minority**, **20% low-income**
- Threshold is +/- 10%
- The transit agency wants to **eliminate** a route (adverse change)
- If fewer than **40% of riders** on the affected route are minority, or fewer than **30% of riders** are low-income, the change passes the service equity test

Example Service Area

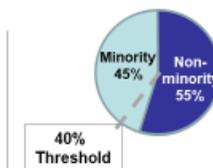


Service Area for a Route with an Adverse Service Change (removing or reducing service)



40% Threshold

✓ Service Change is Equitable



40% Threshold

✗ Service Change is not Equitable

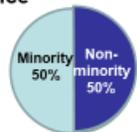


DI/DB Thresholds: Examples

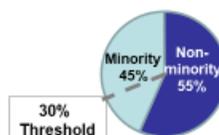
Example 2: Non-Adverse Change

- Service area is **50% minority**, **25% low-income**
- Threshold is +/-20%
- The transit agency wants to **add** a new route
- If **more than 30%** of potential riders are minority, and **more than 5%** of its potential riders are low-income, the change passes the service equity test

Example Service Area

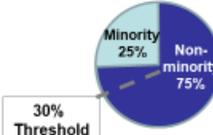


Service Area for a Route with a non-Adverse Service Change (adding or increasing service)



30% Threshold

✓ Service Change is Equitable



30% Threshold

✗ Service Change is not Equitable





What Happens When a DI or DB is Found?

- When a Service Equity Analysis determines that a proposed Major Service Change will create a Disparate Impact or Disproportionate Burden, it does not mean that a transit provider cannot make this change
- The transit agency can still make the change, if they meet two conditions:
 - ☑ Show the “substantial legitimate justification” for the change
 - ☑ Prove that there are no alternatives that would reduce the harm to the affected community
- The transit provider must provide this documentation as part of its Service Equity Analysis



FCDOT's DI/DB Policies

Disparate Impact

A disparate impact occurs when the difference between minority riders and non-minority riders, affected by a proposed service change or fare change, is 10% or greater.

Disproportionate Burden

A disproportionate burden occurs when the difference between low-income riders and non low-income riders, affected by a proposed service change or fare change, is 10% or greater.





Poll Question

- Do these DI/DB policies meet the needs of the people you represent?

DISCUSSION



Discussion Questions:

- What have you heard from your communities about bus service in Fairfax County?
- What can the County do to make it easier for minority and low-income populations to get around?
- What are the best ways to reach the populations you serve to provide them opportunities to participate in transit planning processes?



Public Involvement

- Federal regulations require transit providers to solicit public feedback on its Major Service Change, Disparate Impact, and Disproportionate Burden policies, for *no less than* 30 days
- FCDOT is asking the public to learn more about these policies on our website, and then take the online survey to comment:
<https://www.fairfaxcounty.gov/connector/titlevi/2020-update>
- Your feedback is important and will be considered as FCDOT finalizes its Title VI Program



Contact Information

Brent Riddle

Email: Michael.Riddle@fairfaxcounty.gov

Phone: Tel. 703-877-5600 / TTY 711

Address: Fairfax County Department of Transportation
Coordination and Funding Division
4050 Legato Road, Suite 400
Fairfax, Virginia 22033



APPENDIX D: MAJOR SERVICE CHANGE, DISPARATE IMPACT, AND DISPROPORTIONATE BURDEN PROPOSED POLICIES – PUBLIC COMMENT RECEIVED

A public comment period on the proposed Major Service Change, Disparate Impact, and Disproportionate Burden policies was held from June 29, 2020 to July 31, 2020. Members of the public were offered several different ways to provide comment:

- An online survey
- Virtual focus groups for representatives of community organizations serving minority and low-income populations
- A webpage featuring both the proposed written policies as well as a recorded presentation
- video explaining the Major Service Change and Disparate Impact/Disproportionate Burden policies
- Additional one-on-one meeting with representatives of community organizations serving minority and low-income population

A copy of survey and of the presentation used in the focus group and available on the webpage. In-person outreach activities were not possible due to state and local restrictions on public gatherings imposed as a result of the COVID-19 pandemic.

Figure D.1: Title VI Focus Group Locations

Date and Time	Location	Public Meeting Attendees
Monday, July 13, 2020; 7:00 PM - 8:00 PM	Zoom Web Conference	One attendee (Chamber of Commerce)
Wednesday, July 15, 2020; 12:00 PM - 1:00 PM	Zoom Web Conference	One attendee (Lorton Community Action Center)
Thursday, July 16, 2020; 12:00 PM - 1:00 PM	Zoom Web Conference	One attendee (Irving Middle School)
Thursday, July 30, 2020; 3:00 PM - 4:00 PM	Zoom Web Conference	Hispanic Chamber of Commerce

Focus Group Feedback Summary

While just four organizations participated in the focus groups, those that did participate provided substantive feedback regarding Fairfax Connector services. The participants also gained an understanding of how FCDOT developed and will apply the major service change, disparate impact, and disproportionate burden policies. Participants asked clarifying questions about the policies and agreed that the policies should remain as recommended by FCDOT.

All of the participants noted the importance of partnering and having good communication between FCDOT and their community members. Suggestions included: providing information about services offered and service changes to riders at bus stops and other places in the community, in multiple languages; FCDOT participating in activities with the Chamber of Commerce; and FCDOT partnering with the county school system to advertise bus services available to students and parents. Participants also noted specific topics of concern for providing service to minority and low-income residents, including: ensuring that restructuring the bus routes in response to Phase II of the Silver Line opening will not just prioritize commuters traveling to DC over lower-wage workers traveling to jobs along the Dulles Toll Road corridor; Lorton area riders lacking fast and frequent options for traveling to Springfield and Richmond Highway; and, student travel to school and parent travel to work via transit during the COVID-19 pandemic and the difficulties in providing enough capacity to allow for social distancing.

Public Comments Received via Email or US Postal Service

Similar to the focus group comments, the comments received via email were generally concerned with Fairfax Connector services and not on the proposed policies described above. FCDOT did not receive any comments via the US Postal Service. *Figures D.2 – D.5* show the Title VI Major Service Change Policies Zoom Meetings.

Figure D.2: Fairfax County Title VI/Major Service Change Policies with Dulles Regional Chamber of Commerce

Title VI Major Service Change Policies Zoom Stakeholder Conference with Dulles Regional Chamber - 7/13/2020, 7:00 P.M.
Attendance: <ul style="list-style-type: none">• Brent Riddle, FCDOT• Benjamin Atsem, FCDOT• Stuart Boggs, FCDOT• Sandy Brennan, FITP• John Boylan, President of the Dulles Regional Chamber of Commerce & Longtime resident<ul style="list-style-type: none">○ Works with Businesses○ Interested in transportation and its impact on businesses○ Affordable housing is a part of traffic, congestion, transit issues. Long commutes for employees.○ He participated in a task force to help address community-based issues.

Meeting Summary:

- Mr. Boylan provided some comments about lack of bus service to access the Food Pantry. This means that people are taking Ubers or Lyfts to pick up food. This is a challenge too for businesses, like food service businesses, having access to transit to get to work.
- The chamber is a good resource for disaster preparedness as well. He encourages FCDOT to keep the chamber in mind when thinking about transit and how to build partnerships.
- Challenges is with affordable housing being distributed throughout a transit agency's service area means that it is hard to serve these populations.
- He also noted that this is a challenge with the Herndon Reston and Silver Line opening, reorganizing routes to get people to the new Metrorail extensions, then it prioritizes commuters going into DC over commuters going to lower-wage jobs along the Dulles Toll Road (as an example).
- Fairfax Connector goes above and beyond, but for the Dulles corridor, there are a lot of undocumented workers and others working on the I-66 interchange. They walk or bike to and from work. Would like a bus or safer routes for biking and walking. Additional outreach could be done to these communities to notify them about the FCDOT services.
- In Reston and Sterling, there is a lot of mixing between routes and jurisdictions. Would like to see Fairfax Connector connect into the surrounding jurisdictions.
- Route 50, at the edge of Fairfax, there are many people crossing into Fairfax to work/shop here. Stuart said the Transit Services Division has recently kicked off the Centerville-Chantilly study to look at this.
- Mr. Boylan thinks that when Amazon H2Q moves into Arlington will further push businesses and office space out into Fairfax and will further impact commute times. Also, with Amazon building more Data Centers in Chantilly (?) this will further squeeze transit. Transit routes need to be established to address these new employment centers.
- Mr. Boylan also hosts a "Metro Monday" which FCDOT could join. They discuss development around Metro stations and how that is impacting the business and development landscape.
- Meeting ended at 7:55 PM.

Table D.3: Fairfax County Title VI/Major Service Change Policies with Lorton Community Action Center

<p>Title VI Major Service Change Policies Zoom Stakeholder Conference with Lorton Community Action Center - 7/15/2020, 12:00 P.M.</p>
<p>Attendance:</p> <ul style="list-style-type: none"> • Brent Riddle, FCDOT • Benjamin Atsem, FCDOT • Sandy Brennan, Foursquare ITP • Randy White, FCDOT • Linda Patterson, Executive Director for Lorton Community Action Center <ul style="list-style-type: none"> ○ Serving low-income households, seniors, veterans. ○ Approximately 40% of clients served do not own vehicles.
<p>Meeting Summary:</p> <ul style="list-style-type: none"> • Linda asked: How long does the process last (typically) if you need to address Title VI in a major service change? Randy addressed the timeline question to provide context. • Engagement discussion: Linda mentioned that a lot of the people she serves don't speak English as a first language, do not have consistent access to internet and, in general, have very limited spare time so they do not participate in feedback loops. They often don't know about a service change until it happens and impacts them. To reach them better, FCDOT could go to where they are (bus stops, stations, their apartment complexes, etc.) and they really work better with paper forms of communications (like printed notices or flyers). • The threshold, 10%, seems very reasonable for both low-income and minority measures. • For the people her organization serves, they have expressed concerns about how long it takes to go up Richmond Highway to (?) and to Springfield. Something more frequent or faster or fewer transfers. Especially for those going to Springfield because of the transfers. • Thinks another challenge is that Lorton has some pockets of affordable housing so it's a draw, but then their commutes are longer. When the express bus was added to Richmond Highway, their organization did outreach to info folks so they could use it. • In response, Randy explained the Transit Development Plan (now called a Transit Strategic Plan) process that the county undergoes every five years to look at the network, transfers, ridership, etc. They are now moving to doing it every year but cycling through parts of the County to try to be more proactive to address changing travel patterns and demand. • Brent added that as part of the Strategic Plan for Mobility and Transportation, FCDOT is now thinking about how to bridge gaps through and with other modes (walking/sidewalks, bike infrastructure/trails, etc.). • Meeting ended at 12:55 PM.

Table D.4: Fairfax County Title VI/Major Service Change Policies with Irving Middle School

<p>Title VI Major Service Change Policies Zoom Stakeholder Conference with Irving Middle School – 7/16/20, 12:00 P.M.</p> <p>Attendance:</p> <ul style="list-style-type: none">• Brent Riddle, FCDOT• Benjamin Atsem, FCDOT• Randy White, FCDOT• Lori Zeller, Foursquare ITP• Cindy Conley, FCPS<ul style="list-style-type: none">○ Principal at Irving Middle School. Some of their students use the bus; interested in how to improve service for students.○ Lori's notes about Irving MS:<ul style="list-style-type: none">▪ 8100 Old Keene Mill Rd, Springfield, VA 22152▪ FFC 310 serves right in front of school
<p>Meeting Summary:</p> <ul style="list-style-type: none">• Cindy: Makes sense overall, though 25% seems high for the threshold for a service change. If it is the trigger, how many changes are done a year, and how many of those meet the trigger point? Is it a realistic number to pull the trigger at?• Randy: Some services have exceeded the threshold which causes the need to do a Service Equity Analysis (SEA). Adding a new route is a 100% increase so the SEA needs to be done. Estimating that since 2014, one third of service changes have triggered the need for conducting SEA.• Brent: In 2014 they did initial modeling to see where a good point was for the trigger point. Can't run a SEA for every service change so they've tried to make a good balance.• Cindy: Makes sense.• Cindy: Thinking about elementary school kids who will be getting out at 4:50 now. Some of them are old enough to ride bus. If ridership will be changing in the fall, with Covid19 going on, it will be important to evaluate how well parents are going to be able to pick up their kids' vs bus changes to take care of kids' transportation. Not sure how much this policy impacts her students, will more impact the parents and their transportation choices.• Brent: How many of students and parents use transit in the Irving MS area?• Cindy: They have some kids that use bus after school but thinking more about colleagues elsewhere in the county.• Randy: Going to need to look at schools they are serving, what are the bell times, so they can make sure there are trips that arrive at school in time for students to make it to class, and trips that pick them up after school. Thinking especially about this in the context of the service changes that will be happening for the new Silver Line.• Cindy: Makes sense, 10% seems reasonable. Likes how there is requirement of showing that there is no harm, and that there are no alternatives, if the service change does go forward.

- Cindy: Students being able to ride in non-peak hours has been good, families who used it have been appreciative. For middle-school aged students, it is a good option, because the bus drivers are vetted professionals, as opposed to these students taking Uber or Lyft.
- Cindy: Having bus available in more congested areas, like Herndon, McLean, Langley, is really needed because of the traffic. Heard lots of positives from colleagues.
- Cindy: Appreciated the advertising a couple years ago about the Fairfax Connector (FFC). Advertising may have fizzled out. Can they have a partnership to advertise together more? Especially thinking of the context of minority and low-income families; many parents will be working come fall, and not all kids can be driven to school. Can there be more promotion of what FFC can offer students in getting to school in a safe way?
- Cindy: School is a good way to reach community with messages from the county, through the students. Also, grocery stores, churches, and more. Need to provide a ton of information out there for people.

- Brent: Part of the Title VI program is the Public Participation Plan (PPP), where we look at how do we reach people who don't have digital access, or are Limited English Proficient (LEP) populations, what languages do we translate materials into, how do we make sure that we are able to proactively get input from all Title VI populations? So, your comments are very relevant.
- Cindy: Hand out a bottle of hand sanitizer and a map of nearby buses! A lot of the kids in school are going to be of parents who have to be out of the house for work, and whether it is because of income or not, they are worried about how transportation will look for them.
- Brent: The school system has good resources for reaching out to families speaking all different languages.
- Randy: How will the logistics work for in-person and distance learning?
- Cindy: Monday is up in the air-- either will be all virtual or special populations come in. 684 students have opted to come into the school, so half will come in each for two days a week, dividing by last name. Same for all schools in the division. Tues and Thurs A-K, Wed and Fri L-Z.
- Randy: FCDOT will have to look at this to see if certain extra vehicles will need to run to meet the need of students getting to school. 40ft bus has 39 passenger seats. Lose half of the seating capacity.
- Cindy: Same thing has happened for the division. But there may be more kids with A-K or L-Z, so it will not be exactly half. Not sure how it will work. Only up to 25 students can be on a bus with the social distancing requirements. FFC may need to supplement.
- Randy: FFC also only stops at marked bus stops, and they won't be able to just add in extra stops to serve students.
- Cindy: Reach populations through getting participation of business, school, and church leaders.
- Meeting ended at 12:53 PM.

Table D.5: Title VI Major Service Change Policies Zoom Stakeholder Conference with Hispanic Chamber of Commerce of Northern Virginia

<p>Title VI Major Service Change Policies Zoom Stakeholder Conference with Hispanic Chamber of Commerce of Northern Virginia – 7/30/20, 3:00 P.M.</p>
<p>Attendees:</p> <ul style="list-style-type: none"> • Hypatia Lorena Rios, President, Hispanic Chamber of Commerce of Northern Virginia • Benjamin Atsem, Fairfax County Department of Transportation • Stuart Boggs, Fairfax County Department of Transportation • Brent Riddle, Fairfax County Department of Transportation
<p>Meeting Summary:</p> <ul style="list-style-type: none"> • Ms. Rios introduced herself and noted that she is the president of the Hispanic Chamber of Commerce, a member of a TPB Advisory Committee, and sits on the Access for All Committee. As part of her introductory comments she noted that housing and transportation are linked. • Mr. Riddle then gave a PowerPoint presentation on the proposed Major Service Change, Disparate Impact, and Disproportionate Burden policies. He noted that the purposed of this meeting, as well as of the previous stakeholder meetings was to solicit input on the proposed policies. • Mr. Riddle described how the Title VI program’s foundation is the Civil Rights Act of 1964. He provided an overview of the history of Federal civil rights laws and described the elements of the Title VI Plan. He defined what was meant by a major service change and how the Federal Transit Administration allows agencies to set their specific Title VI thresholds and outreach/consultation policies. • Ms. Rios asked what data is used in the Title VI analysis. • Mr. Boggs described the data used by the Transit Services Division (TSD) planning staff in the analysis, including socio-economic data from the United States Census, as well as ridership, bus loads, on time performance, travel times, and service headways from Fairfax Connector’s fleet Intelligent Transportation System (ITS). • M. Rios asked if the County was planning any service cuts. • Mr. Riddle replied that no service cuts were planned. He noted that the current service reductions were the result of COVID-19 and would be reinstated in late August. • Ms. Rios suggested that the County may not want to be in a hurry to ramp up bus service since COVID-19 is still impacting ridership. • Mr. Riddle then provided an overview of the service equity analysis undertaken by TSD with each proposed Fairfax Connector service change. He discussed the Disparate Impact/Disproportionate Burden policies and how impacts are evaluated regarding minority and non-minority populations. He noted what process TSD follows when a DI/DB is found, with the County required to identify mitigation measures that can be implemented to address the identified impact. Where mitigation is not feasible, he noted that a change could still be implemented if there is a compelling issue that would justify implementing the change. • Ms. Rios observed that she felt she was not equipped to render an opinion on the

proposed DI/DB thresholds but would take the on-line survey and promote the link to her membership.

- There being no further discussion, the meeting was adjourned.

APPENDIX E: FCDOT Title VI Online Survey Results Overview

FCDOT Title VI Survey Results

About

This spreadsheet contains the results of the FCDOT Title VI survey conducted in June-July, 2020. FCDOT offered an online survey in 11 different languages, including English, Spanish, Korean, Amharic, Vietnamese, Tagalog, Chinese, Farsi, Hindi, Urdu, and Arabic. Using examples to make the concepts more accessible, the survey described FCDOT's current Major Service Change, Disparate Impact, and Disproportionate Burden policies and asked survey takers to provide their opinions about them through multiple-choice questions. Survey takers were also provided the opportunity to provide open ended

Table of Contents

Tab Name	Dependencies	Description
Raw Results		Combined results from all four languages which had respondents. Data has been cleaned to remove irrelevant or empty fields, and to remove responses with zero answers. Responses in non-English languages have been translated into English, while also maintaining the original language text.
Response tally by language		Tally of responses by language, including complete and partial responses.
Questions		Question text
Q1 Q2	Pivot table based on Raw Results	Analysis of Q1 and Q2
Q4 Q5	Pivot table based on Raw Results	Analysis of Q4 and Q5
Q6 Q7	Pivot table based on Raw Results	Analysis of Q6 and Q7

Help/Questions

You may direct questions to:

Lori Zeller
Senior Transportation Planner
lzeller@foursquareitp.com
301-655-9058

Figure E.1: Survey Response Tally by Language

Language	Complete	Partial	Total
English	92	15	107
Chinese	1	1	2
Spanish	1	0	1
Hindi	1	0	1
Korean	0	0	0
Vietnamese	0	0	0
Tagalog	0	0	0
Farsi	0	0	0
Urdu	0	0	0
Arabic	0	0	0
Amharic	0	0	0
Total	95	16	111

Figure E.2: Survey Questionnaire for MSC or DI/DB Response Tally by Language

Question	MSC or DI/DB	Question Text
Q1	MSC	If a Fairfax Connector route adds or removes 25 percent of its revenue service hours, should this be considered a Major Service Change? For example, a bus route that had operated from 8:00 AM to 8:00 PM (12 hours of service per day) will now operate from 8:00 AM to 5:00 PM (9 hours of service per day). Should this be considered a Major Service Change?
Q2	MSC	If a Fairfax Connector route adds or removes 25 percent of its revenue service miles, should this be considered a Major Service Change? For example, a bus that had operated a 12-mile route is shortened, so the route is now only 9 miles long. Should this be considered a Major Service Change?
Q3	MSC	Do you have any other comments you would like to offer about Fairfax Connector's Major Service Change policy?
Q4	DI/DB	The Fairfax Connector service area is made up of about 47 percent minority residents. With this in mind, do you agree or disagree with this statement? A service change that reduces service does not disparately impact minority riders if less than 57 percent (47 plus 10) of affected riders are minority riders.
Q5	DI/DB	The Fairfax Connector service area is made up of about 47 percent minority residents. With this in mind, do you agree or disagree with this statement? A service change that adds service does not disparately impact minority riders if at least 37 percent (47 minus 10) of affected riders are minority riders.
Q6	DI/DB	The Fairfax Connector service area is made up of about 18 percent low-income residents. With this in mind, do you agree or disagree with this statement? A service change that reduces service does not disproportionately burden low-income riders if less than 28 percent (18 plus 10) of affected riders are low-income riders.
Q7	DI/DB	The Fairfax Connector service area is made up of about 18 percent low-income residents. With this in mind, do you agree or disagree with this statement? A service change that adds service does not disproportionately burden low-income riders if at least 8 percent (18 minus 10) of affected riders are low-income riders.
Q8	DI/DB	Do you have any other comments you would like to offer about Fairfax Connector's disparate impact or disproportionate burden policies?

Figure E.3: Survey Question 1 and 2 Count

Q1			
Row Labels	Count of Response ID	raw	%
I'm Not Sure	6	6	5%
No	9	9	8%
Yes	96	96	86%
(blank)			
Grand Total	111	111	
Q2			
Row Labels	Count of Response ID	raw	%
I'm Not Sure	10	10	9%
No	14	14	13%
Yes	87	87	78%
(blank)			
Grand Total	111	111	

Figure E.4: Survey Question 4 and 5 Count

Q4			
Row Labels	Count of Response ID	raw	%
Agree	29	29	28%
Disagree	51	51	49%
Neither Agree nor Disagree	24	24	23%
(blank)	7		
Grand Total	111	104	
Q5			
Row Labels	Count of Response ID	raw	%
Agree	42	42	42%
Disagree	36	36	36%
Neither Agree nor Disagree	23	23	23%
(blank)	10		
Grand Total	111	101	

Figure E.5: Survey Question 6 and 7 Count

Q6			
Row Labels	Count of Response ID	raw	%
Agree	34	34	35%
Disagree	47	47	48%
Neither Agree nor Disagree (blank)	16 14	16	16%
Grand Total	111	97	
Q7			
Row Labels	Count of Response ID	raw	%
Agree	45	45	46%
Disagree	33	33	34%
Neither Agree nor Disagree (blank)	19 14	19	20%
Grand Total	111	97	

Figure E.6 – Survey Question 8 – Open Ended Responses

<p>I know that 10% is an easy rule of thumb, but I'm not sure it's an accurate representation of true "disproportionate" or "disparate" impacts. If there's a 9% difference, that's still a huge disproportionate difference to the people affected. Given Fairfax County's huge population size of over 1 million, we could be talking about 10s of thousands of people affected. Technically, it should be weighted and analyzed for statistical significance. If a rule of thumb must be used though, perhaps 5% or 7% should be used instead. Thanks for looking into this!</p>
<p>No</p>
<p>I'm a low-income person. I work part time and cannot afford high fees on the bus. Please don't raise the bus fares or change the route 950 to Herndon and Reston please, it would be a burden on me to walk or get a cab. Please help me to stay on my bus route. Thank you.</p>
<p>No</p>
<p>keep the same if you can</p>
<p>I prefer relative percentages to absolute ones. A 10 percentage point change to an 18% base is relatively greater than same change to a 45% base.</p>
<p>Any change that reduces availability for low income riders is not appropriate. Changes should be made to reduce adverse impacts on low income riders by reducing routes that serve higher income riders to gain financial efficiencies.</p>
<p>This survey was very confusing. You did not do a good job of explaining the questions. I think if there is one poor person who needs service to be available, that we should do what we can to provide it. As an elderly person, I would not want to wait on the corner for a bus that was not coming.</p>
<p>It is impossible to make a rational decision since the threshold values have no explanation for their selection. Perhaps the best approach is to treat the whole county the same and stop segregating it into groups.</p>
<p>Not clear what the impacts presented would result in what action. Think you are making the whole thing too complicated. If changes are needed make them to provide the best service possible at the lowest cost period.</p>
<p>I think 10% is too high and you should consider 5% or 7.5% thresholds instead.</p>
<p>I think the entire bus connector system is outdated. A waste of time for anyone who uses the system having to wait for the bus or a connection especially in adverse weather. I say develop a system that utilizes the current taxi/Uber/Lyft transportation systems. Vouchers or some other form of reimbursement for services. Riders could call a central dispatch for pickup services rather than trudging to the nearest bus stop to wait for transportation.</p>
<p>The effect of changes in public transportation disproportionately affects lower income residents not only based on numbers or percentages of users but based on alternatives available to these riders.</p>
<p>Why can't every area be serviced commensurate with the needs of the respective community? Third shift folks need transportation to and from as well.</p>
<p>no</p>

<p>Good grief! I have a college degree and I could NOT figure out what the heck those pie charts were trying to represent! HORRIBLE design! Horrible wording of survey questions (I design surveys!). If you want to say "Do you think weighting low-income areas in favor of fewer cuts to service is the right thing to do?" THEN SAY THAT! Because, yes I do! I suspect that low income areas are more likely to use public transport in Fairfax. Therefore, I would expect it to count more in terms of usage.</p>
<p>The complete removal of a route that services predominately low-income areas.</p>
<p>Fairfax needs to prioritize low income residents, people with disabilities, and Black and Brown residents in making these decisions. They need to be at the table and have their needs placed first. That would be equitable.</p>
<p>I just want to be sure that the routes that connect the areas of lower income/minority ridership still have vital and viable options when it comes to the amount of routes and schedules available to them getting to the places that help them make a living. I grew up riding the public bus and I wholeheartedly understand changes that have to be made from a revenue perspective but how important a service the local bus provides. I just want to make sure the overall effect isn't diminished.</p>
<p>no</p>
<p>adding service supports riders. removing service affects riders. these are no brainers or should be folks</p>
<p>The burden with always be disproportionate. Please try harder to reduce that burden for all marginalized and underrepresented groups.</p>
<p>No</p>
<p>I think it does not matter what the service _area_ of the FC includes but what the _ridership_ statistics might be. Sure, only 18% of the population of the service area is low income, but how many of the riders are low income? I'm sure it's a significantly higher percentage and THAT is a more important number to look at. The service area only tells you a small amount of information, if Fairfax County is 18% low income but the ridership is 58% low income, then you have to make the impact decisions based on a much smaller incremental change because your ridership will be impacted at greater numbers in total.</p>
<p>They survey questions are biased.</p>
<p>No.</p>
<p>I did not understand your convoluted question.</p>
<p>Not now</p>
<p>No 暂无</p>