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- 4 Plain Language for Rural Transit: Writing for Readability and Clarity
- 7 Tackling Traffic with Open-Source Mobility Solutions
- **9** FTA Drug and Alcohol Regulation Updates
- Seven Best Practices for Prioritizing Transit
- 14 Opening Doors: Including People with Disabilities in the Transit Workforce

The Rural Transit Assistance Program (RTAP) was initiated in 1986 by the Federal Transit Administration (FTA) to provide resources, training and technical assistance to rural transit providers. The Missouri RTAP Center is located at Missouri University of Science and Technology (Missouri S&T) in Rolla. Since April 2012, Missouri S&T has been contracted by MoDOT to manage the RTAP program.



National RTAP is a program of the Federal Transit Administration dedicated to

creating rural transit solutions through technical assistance, partner collaboration and FREE training.

# INFORMATION $\vdash$

# LETTER FROM THE MANAGER



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# **PUBLICATION INFORMATION**

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#### THE FINE PRINT

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# **DEAR TRANSIT FRIENDS,**

The Missouri RTAP team, Pat Diaku, John Rice, and me, enjoyed seeing many of you at the MPTA State Conference and Expo on September 3-5 in St. Louis. The conference provided an opportunity for us to share updates, pass out resources, and gather training ideas. I provided a Missouri RTAP update during the Rural Transit Operations MoDOT & RTAP Transit Update session, and Pat hosted the National RTAP booth in the exhibitor area. She passed out numerous training and promotional materials. As a follow to the feedback we received, we are interested in hosting a virtual orientation workshop for new directors. This workshop would allow new transit managers a forum to ask questions, become engaged in information sharing, and hear about available resources. Please note that National RTAP has resources for new directors available as well such as the Transit Managers Toolkit. We would also like to start a mentor program for new managers and other staff where we could help pair individuals with someone in the same or a similar position in another agency. This mentor would be someone who could provide suggestions and share lessons-learned through an informal collaboration. The National Local Technical Assistance Program Association (NLTAPA) has a successful peer-to-peer mentor program that we plan to use as a model.

I also provided an overview of the Scholarship Reimbursement program for the new transit managers and staff. Since the conference, Pat has received several Scholarship Reimbursement requests from those who attended. If you have not submitted your reimbursement requests for lodging, parking, mileage, per diem, and other conference expenses, please do so as soon as possible. The forms can be found at Missouri RTAP Scholarship Reimbursement Program.

Please keep the RTAP team informed of any upcoming events your agency will be hosting. We would like to highlight events in upcoming eNewsletters and attend in person if possible. Please feel free to contact me at pickerillh@mst.edu or by phone at 573-341-7637 with any questions, comments, or suggestion. The entire Missouri RTAP staff wish you a wonderful fall season.

Kind regards,

Heath Pickerill, Missouri RTAP Manager





# PLAIN LANGUAGE FOR RURAL TRANSIT: WRITING FOR READABILITY AND CLARITY

YOU PROBABLY WRITE AND EDIT MANY ITEMS FOR YOUR TRANSIT AGENCY: SCHEDULES, RIDER GUIDES, DELAY NOTICES, TRAINING MATERIALS, WEB CONTENT, ETC. BUT IS YOUR WRITING CLEAR AND EASY TO UNDERSTAND?

Can it be understood by people with low literacy or people whose first language is not English? Writing so all people understand is important for safety and operations. It is also the law. This Technical Brief explains Plain Language writing and how you can use it to make your writing simpler and better. The brief is also written in plain language to serve as a model.

# **BACKGROUND**

According to the federal Plain Language website (plainlanguage.gov), plain language is "communication your audience can understand the first time they read or hear it." The term was introduced in 1970 for government writing when federal law stated that "environmental impact statements shall be written in plain language." A 1998 Presidential Memorandum directed all federal agencies to use plain language in service documents. The memorandum described features of plain language

and how to implement it. Executive Order 13166 Improving Access Services for Persons with Limited English Proficiency was issued in 2000. The Plain Writing Act of 2010 required all federal agencies to write clear communication that "the public can understand and use." The United States Department of Transportation (U.S. DOT) created a Plain Language Action Plan and has a senior official to oversee its plain writing function. Plain language as a concept has been around for a long time. There are documents and articles from the 1700s written in plain language. People have always needed a way to communicate with easy-to-understand words and ideas. It is a good idea to use plain language even if your transit agency is not required to. According to the National Center for Education Statistics, about 21% of adults in America have low literacy. Literacy means being able to read, write, speak, and communicate well.

Transit agencies need readers of all their materials to be able to understand them so:

- Riders get the services they need
- Laws and safety rules are followed
- Staff can do their jobs well

# WRITING PLAIN LANGUAGE MATERIALS FOR RIDERS

People with low literacy have difficulty reading and understanding written material. There are many reasons why people may not be able to read well, such as:

- English is not their first language
- Learning or other disabilities
- Lack of education

People who have trouble reading may feel ashamed. They may not want to ask for help. You can help them by making your written materials as easy as possible.

# **HOW DO YOU DO THIS? USE THESE TIPS:**

- Use the easiest words you can. Use words with fewer syllables (the word rider is shorter than traveler or passenger) or use the word that most people use (the word bus is used by more people than vehicle).
- If you must use a difficult word, explain it the first time you use it. Examples: "Mobility means getting where you need to go," and "We offer a fixed-route service. This means we have a regular schedule for when and where you can get on the bus."
- Use short sentences and paragraphs. "Travel training is free" is a shorter sentence than "We do not charge our passengers any fees for our travel training services." U.S. DOT recommends no more than 15-20 words per sentence and less than 7 lines per paragraph.
- Here is a sentence about commas that may be hard to understand: "If you have sentences with commas, try to break them up into separate sentences." Here is an easier sentence, "Break sentences with commas into more than one sentence."
- Use bulleted lists or tables.
- Include images. Include plain language captions to describe them.
- Use an active voice. Write like you are talking to someone. This sentence uses a passive voice and may be confusing, "Our passengers need to understand our policy that states that they are allowed to bring service animals on the bus." This sentence uses an active voice, "You can ride the bus with a service animal."

Some guidelines recommend writing materials for people who have completed an 8th grade education because

that is the average literacy level for the United States. This is especially important for medical information. There are tests to check the grade level of written materials. Microsoft Word's readability checker in their word count tool is one example. Readability checkers can give you a basic idea of the reading level of text. The best way to check for readability is to have people of many backgrounds read your text and let you know what they don't understand.

# **CREATING PLAIN LANGUAGE STAFF TRAINING MATERIALS**

Many transit agency staff are experts in their fields and understand high-level concepts. The Federal Plain Language Guidelines advise writers not to "dumb down" training materials to reach a goal of an 8th grade class. Take the audience's level of knowledge into account if you are writing materials for your staff or a presentation.

Many of the concepts explained in the previous section about writing for riders also apply to writing for staff. Use an active voice in training materials. Be direct. You are showing or telling someone how to do something. "Secure the wheelchair with tie-down straps" uses an active voice. "The wheelchair should be secured using tiedown straps" does not. Someone might read the second sentence and think that a wheelchair could be secured that way, but it does not have to be.

Do not assume that your staff knows an acronym. Put the acronym in parentheses when you first use it. An example is Federal Transit Administration (FTA). Just use FTA for the rest of the document. People often include too much text in training materials. It is easier to write more than to write less. Think of the top 3-5 things you need your staff to know and how this can be explained in the fewest words and sentences. Start with an outline. Write a few sentences that fully explain each point. Use the word must if your staff needs to comply with something. Do not use should, ought to, shall, could, or can. Write "Staff must take annual U.S. DOT drug and alcohol 60-minute training." There is less chance of misunderstanding this way. Tables and checklists are good ways of presenting material with more than one concept. Here is an example showing pretrip inspection training from National RTAP's 2 The Point training:

Front of vehicle	Front curb-side	Front road-side
Tires	Tires, rims and wheel wells	Tires, rims and wheel wells
Turn 4-way signal lights	Front turn 4-way signal lights	Turn 4-way signal lights
Windshield glass not chipped or cracked	Front door glass and passenger windows	Driver's side window

Use the same word throughout. Don't switch between driver and operator to be more interesting.

Edit materials more than once. Have one or two other people review them. Review them for:

- Slang or jargon (words like pic instead of picture)
- Difficult and unnecessary words training documents are not the place to show that you know the word ubiquitous
- Long, run-on sentences that can be broken up into separate sentences
- Sentences that do not add anything valuable to the training – remove them or rewrite them

#### PLAIN LANGUAGE FOR ONLINE CONTENT

Make a special effort to use plain language when you post online because anyone can access it. People usually visit websites to perform tasks or find information. They expect to be able to use web pages without help. Each web page should have a clear header like **Schedules and Fares**. The written content on that page should explain in the fewest words and sentences possible what people need to know. People do not want to read a long document. People want key facts that are easy to find and understand. A good practice is to fit content for each web page on one screen. If people have to scroll to read everything on a web page, you may have written too much and need to simplify. Think about how content will look on mobile devices like cell phones too.

Don't copy and paste text from a Word document or from one online source to another. Your online content will be clearer and easier to understand if you start from scratch. Having just a few words or bullet points on a web page is fine if it meets the goals of the page.

Use the easiest and most direct words for links and buttons on your website. Make the links and buttons consistent throughout your website. Ask people what they think links and buttons should say. There are buttons used by many websites because they are in plain language and are very direct. Examples include About Us, Contact Us, and News.

Use simple words in your keywords and tags, including Alt Tags for people with disabilities.

If you get questions from website visitors who don't seem to understand the content on your web page, take that as a sign that you need to rewrite the web page to make it clearer.

# **BEST PRACTICES**

Once you start working with plain language everything you write will be clearer. It may never be perfect. Here are tips to make your writing as easy to understand as possible:

- Keep everything short: short sentences, short paragraphs, and (when possible) short words.
- If you have to introduce a long word that people may not know (like infrastructure), explain it in plain language terms.
- Use simple, meaningful headings to break up text.
   The heading for this section is Best Practices. The heading explains exactly what the section contains.
- You can also use short question headings like How Do I Book a Ride?
- Use present tense. Don't use past or future tense. "Take the Connector to Main Street" is an example of present tense. "You will take the Connector to Main Street" may make it seem like there are other ways to get there.
- Don't use many words when less will do. "You must undertake the commencement of your test" uses eight words while "Begin your test" uses three. The sentence "Use more extra added caution in extremely or exceptionally cold weather conditions" can be shortened to "Be more careful in very cold weather."
- You can use contractions in plain language writing, such as don't, can't, and driver's side. It may seem more natural to readers than do not, cannot, and side of the driver.
- Review and edit all your rider information and staff training documents regularly. Review them every few years if you can. Terms that worked well in the past may become out-of-date. Newer words or phrases may be available now that more people understand.

# **Examples of transit materials in plain language:**

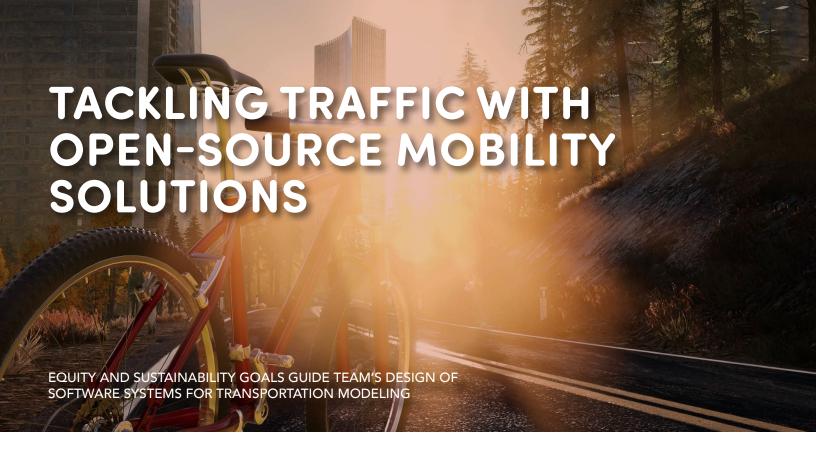
Rider Information

- Bluefield Area Transit Rules of Conduct
- <u>JTrans Reservations Code of Conduct</u>
- Steuben County Need a Ride Travel Training

# Staff Training

- Canadian Transportation Agency Plain Language
   Summary of the Accessible Transportation Planning and Reporting Regulations
- Centers for Disease Control and Prevention (CDC)
   Distracted Driving at Work
- Minnesota DOT General Writing Guidelines and Plain Language

chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://nationalrtap.eos-intl.net/elibsql16\_N94067\_Documents/ Resource%20Share%20Files/Plain\_Language\_for\_Rural\_Transit.pdf



Traffic congestion, bad air quality and lack of mobility options are some of the most critical issues affecting transportation in the United States.

Helping municipalities develop equitable and sustainable transportation solutions to address these challenges is the main focus of an interdisciplinary team led by Xuesong Zhou, a professor of civil, environmental and sustainable engineering in the School of Sustainable Engineering and the Built Environment, part of the Ira A. Fulton Schools of Engineering at Arizona State University.

"We are not just a population of drivers," Zhou says. "Communities have many different layers of transportation needs. We want to provide a complete vision."

The National Science Foundation, or NSF, recently awarded \$1.5 million to the team to develop multimodal mobility solutions for transportation infrastructure. The grant is part of the Pathways to Enable Open-Source Ecosystems, or POSE, program, which aims to support the translation of research into accessible and sustainable open-source systems for addressing national societal challenges.

Zhou, the project's principal investigator, and his team are developing the Consortium of Open-Source PlaNNing Models for Next Generation Equitable and Efficient Communities and Transportation, also known as CONNECT. The consortium unifies metropolitan planning organizations, government transportation engineers, computing researchers, open-science educators and optimization scholars.

CONNECT aims to standardize transportation data to make it more accessible to decision-makers and the public at large. The team's solution will help municipalities make informed, timely transportation and infrastructure improvements to address equity and sustainability goals.

"One of the most exciting and innovative aspects of this project is the development of interoperable and standardized solutions that enable transportation researchers to easily exchange, integrate and reuse multimodal data sets created by others," says WenWen Li, a co-investigator on the project and a professor who leads the CyberInfrastructure and Computational Intelligence Lab in ASU's School of Geographical Sciences and Urban Planning.

"Our approach significantly reduces data processing and preparation time, accelerating the problem-solving process for complex transportation challenges and better serving the diverse needs of communities," Li says.

# **Reflecting community needs**

The CONNECT project proposal states that a healthy and equitable society requires a variety of mobility options, including walking and cycling for short distances, public transit for longer trips and driving or riding vehicles only when necessary.

Zhou says most areas have a transportation infrastructure designed primarily for personal vehicles. The result is that people who do not own a vehicle or cannot operate a vehicle due to age, finances or disability are limited in their ability to travel.

"We see the need for mobility options due to the increasing number of older people and higher percentage of disabled or low-income people in our population," Zhou says. "People actually spend more of their income on transportation expenses when they don't have vehicles and are limited on transit options."

Still, government agencies responsible for infrastructure planning are often unable to quickly meet the community's transportation needs because of a lack of time, funding and workforce availability.

Issues involving budget constraints, permitting, data collection and collaboration lead to projects being addressed only when they become a critical priority. This often means decisions are made as a result of reactive planning or urgency due to a high amount of traffic or safety issues.

Zhou says communities with smaller populations may have only one person creating plans for populations of 50,000 or more people.

"They are very busy," Zhou says. "We're trying to make sure one person can make multimodal infrastructure plans happen."

# **How CONNECT helps**

The CONNECT project would help communities develop plans based on real data collected through an open-source ecosystem.

"The transportation field has both an innovative community of researchers that pushes the methodological boundaries and a large and vibrant community of practitioners that applies transportation models for a variety of forecasting and policy-making purposes," says Andre Carrel, a coinvestigator on the project and associate professor at the College of Engineering at The Ohio State University.

But moving scientific advances into practice is often slow, with practitioners having difficulties adopting researchers' new modeling frameworks into practical applications, Carrel says.

He notes that open science principles allow practitioners to more easily review and adapt code and models created by researchers. "Building a transportation science-oriented, opensource ecosystem is invaluable not only for the research community but also for stakeholders and the many local and underserved communities our solutions aim to serve," Li says. "That said, this project requires a tremendous amount of effort."

Li commends Zhou for his dedication to contributing to and advancing this open-source ecosystem.

"Our team, composed of interdisciplinary experts, including transportation engineers, computer scientists, optimization researchers, geospatial information scientists, and representatives from government and non-profit organizations, reflects ASU's core values of cross-disciplinary innovation and societal impact," Li says.

With this open-source ecosystem, transportation planners would save time collecting data and spend more time applying their limited resources toward solutions that meet the needs of their community.

"It considerably reduces the barriers and effort involved in inspecting and understanding the data and code that underlie a scientific advance, which in turn makes it more likely that modeling innovations will be picked up by practice," Carrel says.

The multimodal plans enabled by the program will show how a road or transit line can be optimized to meet the community's needs. The data will be presented in a format that can be interpreted easily by anyone.

"This is better than just literally walking through the city hall trying to propose planning solutions based on an opinion of how the roads should be constructed in your community," Zhou says. "You don't have to wait for somebody to want to make a change."

The CONNECT solution also seeks to eliminate nearly all the manual processes that have been barriers in multimodal transportation planning.

"The definition of an ecosystem is that you have different types of contributors," Zhou says. "I tried to facilitate a vision that is for the community, by the community."

<u>fullcircle.asu.edu/research/tackling-traffic-with-open-source-mobility-solutions/</u>



# DOT Publishes Federal Register Notices Regarding Its Oral Fluid Drug Testing Rule

On June 21, DOT published three notices in the Federal Register related to oral fluid drug testing:

- Technical amendments clarifying existing provisions and addressing errors or omissions from the May 2, 2023 final rule. These amendments do not make significant substantive changes to Part 40, but correct errors that might be confusing to stakeholders. This final rule is effective June 21, 2024.
- A direct final rule (DFR) that provides temporary qualification requirements for mock oral fluid monitors, identifies which individuals may be present during an oral fluid collection, and clarifies how collectors specify that a sufficient volume of oral fluid was collected. Effective on August 5, 2024 unless DOT receives adverse comments by July 22, 2024.
- A notice of proposed rulemaking (NPRM) containing the same amendments in the DFR mentioned above to amend 49 CFR Part 40 for use if adverse comments are received on any provisions in the DFR. If no adverse comment is received, no further action will be taken on the NPRM.

For more information, view the notices on DOT's Office of Drug and Alcohol Policy and Compliance (ODAPC) website. <a href="mailto:transportation.gov/odapc/frpubs">transportation.gov/odapc/frpubs</a>

# **Employee Identification**

Prior to an FTA drug or alcohol test, the collector or technician is required to verify the identity of the employee, as described in 49 CFR 40.61(c) and 49 CFR 40.241(c). In nearly all cases, this will be accomplished with the employee presenting a photo ID issued by the

employer (e.g., a company ID) or a Federal, state, or local government (e.g., a driver's license or passport). Faxes or copies of a photo ID are not acceptable as positive identification. IDs without a photo (e.g., a social security card) are also not acceptable.

Occasionally, an employee may not have a photo ID, such as when they misplace their wallet. In these cases, an employer representative – but never a co-worker or other employee being tested – may identify the employee. The collector or technician may also contact a Designated Employer Representative (DER) to verify the employee's identity if the employee cannot produce positive identification.

# FTA's Test Reclassification Procedures

At times, a test is conducted incorrectly. For example, consider a DOT test performed on an employee who does not fall under the requirements of FTA and Part 655, or a DOT test performed on a safety-sensitive employee in error with a verified positive result. Mistakes happen, but what do you do now?

# Positive Test Reclassification

FTA places significant importance on the reclassification of a positive DOT test. Assessing the degree to which regulations apply to an employee determines if downgrading a test result is justified.

To request a reclassification of a positive DOT test to a nonDOT test, the employer (DER/ DAPM) must email the FTA Drug and Alcohol Program Managers at FTA-DAPM@dot.gov. The employer must also send certain documentation to FTA for review as part of these requests (e.g., Alcohol Testing Forms (ATFs), Drug Testing Custody and Control Forms (CCFs) medical review officer (MRO)-verified results), which should be password protected, with the password sent in a separate email.

# **Negative Test Reclassification**

FTA approval is not required to reclassify a negative DOT test to a non-DOT test. Documentation of the reason the test was conducted incorrectly should be maintained with the testing documents. The employer should also ensure that the test is not included on that year's Management Information System (MIS) report.

# **Policy Changes & Board Approval**

FTA requires its covered employers to disseminate a drug and alcohol testing policy adopted by its governing board (or other responsible party, as applicable). Policy requirements are set forth in 49 CFR 655.15. While this section requires the employer's board "adopt" the policy that is then made available to all covered employees, FTA allows some policy statement changes to be made without requiring further board adoption/approval. Technical corrections often do not require additional adoption, while substantive changes do.

Technical corrections – such as adding a regulatory citation, updating the DER's contact information, or fixing a typo – can usually be implemented without formal approval. These are nominal administrative adjustments that ensure policies remain compliant with the regulations without altering their meaning.

However, when it comes to substantive revisions – such as redefining the employer's disposition regarding violations, dilute-negative test results, or pre-employment alcohol testing – board review and adoption is required. Any time revisions have significant implications for covered employees, board readoption should be obtained to ensure compliance with the requirement for the distributed policy statement to be endorsed by the governing body.

# What Employers Should Know About Insufficient Drug Specimens

If an employee does not produce a sufficient specimen for a drug test, they must be offered an opportunity to have a medical evaluation to determine whether the insufficient specimen was due to a legitimate medical condition. In this situation, a DER must first consult with their MRO, and then direct the employee to obtain an evaluation by a licensed physician acceptable to the MRO within five days (49 CFR 40.193(c)).

If the evaluation concludes that there is not an adequate basis for determining that a medical condition has, or with a high degree of probability could have caused the insufficient specimen, the MRO will verify the test as a refusal. Employers must respond to the result in the same way as any other DOT violation: the employee must be referred to Substance Abuse Professionals (SAPs), and may not return to safety-sensitive work until they have completed the return-to-duty requirements of 49 CFR Part 40 Subpart O.

In contrast, if the evaluation concludes that a medical condition has, or with a high degree of probability could have caused the insufficient specimen, the MRO will verify the test as cancelled. Accordingly, employers may not take any further action with respect to the employee (49 CFR 40.193(i)).

In the event that the test type requires a negative result (i.e., a pre-employment, return-toduty, or follow-up test) and the evaluation concludes that the insufficient specimen was due to a long-term medical condition, the employee must receive an additional medical evaluation to assess clinical evidence of prohibited drug use, per 49 CFR 40.195. Based on this evaluation, the MRO will verify the test as either negative (if clinical evidence of drug use is not found) or cancelled (if clinical evidence of drug use is found). Employers must respond to these test results in the same way as typical negative or cancelled results, as applicable.

# **Employers Can Test Higher than Minimum Rate**

The current minimum annual percentage rate for random drug testing is 50 percent of covered employees and the current random alcohol testing rate is 10 percent (88 FR 83597). The FTA Administrator reviews these rates annually and can change them based on the industry's annual reported positive drug and alcohol violation rates.

It is important to note the rates are absolute minimum requirements. Rounding up (i.e., the act of raising a number to the nearest whole number) is not allowed when calculating an employer's annual random testing rates. Rates below the minimum by a fraction of a percentage point are still considered to not meet the requirements.

It should also be noted that since these rates are *minimum requirements*, FTA covered employers are free to test at a higher random rate, should they choose to do so. There is no maximum limit, and employers do not need to state the higher rate in their FTA policy.

# **Minimum Testing Rates**

Drugs: 50% Alcohol: 10%

https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-07/FTA-Drug-and-Alcohol-Regulations-Updates-July-2024-Issue-81.pdf

# Seven Best Practices for Prioritizing Transit Equity

Many transit agencies and planners are searching for ways to integrate equity into their projects and put underserved communities first in decision making. Our approaches to two transit studies—one in Virginia and one in Washington—highlight a multi-faceted approach that can help stakeholders hone in on local needs and elevate equitable representation in their own projects.

# **Diverse Opportunities to Elevate Transit Equity**

Virginia Transit Equity and Modernization Study: The Department of Rail and Public Transportation (DRPT) set out to identify equity gaps and opportunities for transit engagement throughout the state, involving nearly 40 Virginia Commonwealth transit agencies in the study. With a focus on accessibility, infrastructure, technology, electrification, and more, the team collaborated with DRPT to gather diverse perspectives from transit agency leadership, staff, service operators, and underserved communities.

Equity Considerations for Sound Transit's Everett Link Extension: The planned Everett Link Extension (EVLE) is more than 16 miles long and will provide at least six more light rail stations in an expanding part of the greater Seattle area. Kimley-Horn is in charge of transit design and preliminary engineering through final system engineering as well as planning, environmental phasing oversight, and public engagement management. We coordinate very closely with Sound Transit and our subconsultants for all aspects of the project—and "EVLE team" throughout this article refers to Kimley-Horn, Sound Transit, and our partners as one cohesive group. Together, we are prioritizing those who use the transit system the most and weaving equity considerations throughout the project—

particularly when examining alternate locations for transit stations in historically underserved areas.

# **Equity in Transit Projects: Seven Best Practices**

Our equity-focused priorities and processes offer guidelines to help stakeholders reimagine transit projects and boost their community impact.

# 1. Plan Equity from the Start

The EVLE team wove equity throughout planning by using a Racial Equity Tool (RET) that Sound Transit developed as part of their commitment to agency-wide diversity, equity, and inclusion. Described as "both a product and a process," Sound Transit's RET provides a streamlined avenue for project development staff to identify equity-focused goals, collect relevant data, involve diverse community voices, and make critical decisions about how people will be impacted by project updates and outcomes. The RET allows equity to rise from being a subconscious project benefit or an afterthought to being explicitly integrated from the beginning.

Similarly, the Virginia Transit Equity and Modernization Study leaders analyzed equity from a variety of angles. We developed a methodology with diverse perspectives—including representatives from transit agencies throughout the state such as RVA Rapid Transit, GRTC Transit System, and Bay Transit (who each participated in a 2023 WTS panel alongside Kimley-Horn on this project).

# 2. Set a Scope for Equity

Part of integrating equity into projects involves scope setting—determining what aspects of the project need attention and what communities deserve priority in impact considerations. The Virginia Transit Equity and Modernization study considered equity in six key project areas:

- Accessibility: Is the transit system available and usable for the people who need it most?
- Adequacy of infrastructure: Can the current buses, stops, stations, and other infrastructure support the needs of the community?
- Emerging technologies: How can new technology make transit more efficient, accessible, and environmentally friendly?
- Electrification: Are agencies interested in transit electrification, and what would be the best path to creating an electric, zero-emission bus fleet?
- Safety: How can transit systems prioritize passenger safety, both in terms of on-the-bus security and safety in different traffic and roadway conditions?
- Engagement and governance: How can transit systems ensure widespread agency engagement in setting priorities and standards, making changes, and procuring funding?

This identification of focus areas allowed the team to develop technical working groups that could devote their attention to these topics. Team segmentation ensured that all pre-identified transit equity priorities would receive importance in the project's big picture.

For Sound Transit's EVLE scope setting, the team considered ways to not just reduce harm, but also to elevate the transit-dependent, low-income, and underrepresented populations in the area to achieve an outcome that worked for everyone. While the RET tool provided general guidance, the team had to strategize how to specifically apply it to a capital project. This equity-informed scope setting enabled the team to build engagement with communities and relevant data collection into the project plan.

# 3. Prepare the Team and Branding

Planners must visualize the need for equity and develop wording to explain the "why" behind their decisions. For the Virginia Transit Equity and Modernization Study, this meant a series of discussions led by subconsultant Powerful Pathways. Discussions were held separately with the project team and subconsultants, the DRPT leadership team, and the Virginia transit agency CEOs to educate everyone on unconscious bias in design and planning, the history of transportation disparities and community impacts, and equity in decision making.

The team also recognized the value in honing a brand that could tell a cohesive story throughout the project and effectively engage the public and other stakeholders. A graphic designer created templates, branding guidelines, and a website that the client and the project team leveraged throughout the process. Graphic dioramas further illustrated topic areas and increased understanding of the situations the study wanted to focus on.

# 4. Identify Community Data to Collect

The EVLE team recognized the value of collecting both quantitative and qualitative community data early in the project. The quantitative data the team collected included information on the proximity of station locations to minority populations and the number of people with disabilities within a given walkshed. Collecting qualitative data included asking people about the following:

- Potential for acquisitions to impact affordable housing
- Culturally-specific community facilities
- Important resources for low-income residents
- Possible changes to traffic operations

The EVLE team set clear and measurable data collection parameters to reflect equity considerations. For instance, the team defined low-income as 200% of the federal poverty level and specified that this population included those within a 10-minute walk of other stations based on existing residential uses.

The Virginia Transit Equity and Modernization Study team similarly delineated specific data collection goals into three categories:

- Travel choice: What kinds of transportation do people choose? What considerations do they use to select how to travel?
- Travel reach: What areas are people able to access with the transportation options available to them? How do limitations on travel constrain or enable people to receive community resources?
- Travel opportunity: What is the quality of the passenger experience? What options do regular transit riders have and how do they access bus stops? How do transit services and ride experiences provide passengers with the ability to live vibrant, connected lives?

These equity measures allowed the team to effectively analyze more than 650 bus stops throughout the state and create a data-driven, holistic picture of Virginia's transit systems.

# 5. Leverage Technology Tools

The Virginia Transit Equity and Modernization team leveraged technology in thoughtful ways to collect feedback, identify gaps, and present information to key stakeholders. By using a data-driven planning tool

developed by Kimley-Horn, the team measured travel reach and destination opportunity metrics for potential riders around the Commonwealth. After initial evaluations, the team assigned a score to each region based on the accessible community resources and other destinations within an hour travel radius or less.

In addition to surveying accessible transit across regions, planners also created a visualization that contrasted how travel by personal vehicle compared to transit ridership in terms of opportunity access. The use of data-driven visualizations allowed the Kimley-Horn team and DRPT to connect the dots on equity across Virginia, locate underserved areas that had limited connectivity to community resources, and prioritize projects in those areas.

# 6. Implement a Multi-faceted Community Engagement Strategy

Creating solutions that authentically represent the community of transit users was a focal point of the Virginia Transit Equity and Modernization Study. The Kimley-Horn team used a multi-faceted approach to collect feedback—including focus groups, a public forum, a survey, and a story-sharing campaign. The rider focus groups helped capture the rich stories and lived experiences of passengers, and the inclusive group makeup of riders, non-riders, users with disabilities, and people from various geographic regions supplemented and enhanced the data analysis.

The team also maintained regular communication on project goals, presenting to government boards and soliciting community engagement through social media, a study website, and an e-newsletter. Altogether, DRPT had more than 3,500 interactions with stakeholders and community members, including participation from all 39 transit agencies across Virginia. This widespread engagement effort captured narratives from diverse people throughout the Commonwealth and enriched the project's capacity to identify equity gaps and prioritize changes.

Similarly, the EVLE team relied on multiple modes of engagement to collect community data. Relationships with non-profits and other community groups helped the team better understand the needs of the area and establish trust. Additionally, the team created an inclusive Community Advisory Group that helped bring in diverse voices to speak on decision-making and held neighborhood pop-up events in historically underserved areas.

The EVLE team also set up workshops facilitated by equity subconsultants and invited underrepresented populations to the workshops to gather their input. To

ensure that project communication was accessible to participants, the EVLE team provided communication in a variety of languages. This approach created multiple ways for community members to contribute to project considerations and potential outcomes.

# 7. Ensure Equity Considerations are Integrated

After collecting community and stakeholder data, the EVLE team evaluated options through a newly-honed equity lens. In addition, we integrated considerations, including the following:

- Land use plan consistency
- Population and job changes
- Cost estimates
- Multimodal transportation connections
- The adaptation of natural and built environments over time

For the EVLE project, using the RET allowed the project team to spotlight the advantages and disadvantages of alternative station locations specifically in terms of equity and community needs. The team created presentations highlighting these discoveries for key community groups, further building on the relationships they had honed throughout the engagement process. As the project continues, the EVLE team plans to reinforce equity by investigating additional station locations and choosing preferred alternatives. Additionally, the group plans to bring community members back in for workshops to further specify goals and implement equity after the initial research period.

As part of their process, the DRPT team identified areas across the state to potentially adopt emerging technology, integrate bus stops and sidewalks more consistently, increase perceived and actual safety for transit riders, improve basic transit infrastructure, and more. The team and their collaborators have since moved forward with a three-pronged strategy to map out the basic needs we discovered in different regions, create an official action plan, and kick off the plan with next steps for implementation.

Integrating equity into transit plans does not happen accidentally—it involves intentional community engagement, data collection, and prioritization from the beginning of a project. As stakeholders learn more about how to weave equity into transit plans in a way that makes an impact, we and our partners are here to help implement these seven best practices into future projects.

<u>kimley-horn.com/news-insights/perspectives/seven-best-practices-prioritizing-transit-equity/</u>



The transit workforce is expected to grow substantially in coming years and already, more than 90 percent of public transit agencies are struggling to hire individuals for frontline positions (1, 2).

In 2022, only 21.3 percent of people with a disability were employed nationally, while 65.4 percent of people without a disability were employed (3). This stark employment disparity suggests that people with disabilities comprise an untapped pool of potential candidates for positions. Partnerships between transit agencies and organizations that connect with and serve people with disabilities can result in powerful and mutually benefi cial relationships, as evidenced by the case examples that follow.

Cheerleaders for a diverse transit workforce, particularly those who are focused on people with disabilities—are thrilled that this topic is included in this TR News theme issue. It affi rms the idea of "nothing about us without us," a longtime ideal of the Independent Living Movement. This principle envisions people with disabilities as being at the table in policy and strategy decisions that affect their lives. In the transportation industry, individuals with disabilities should comprise part of a diverse workforce and—using approaches discussed in this article—can be included in recruitment and retention initiatives. The authors offer an overview of strategies gleaned from a literature review, their professional experiences, and interviews with practitioners in the field.

# **Case Examples**

METROWEST REGIONAL TRANSIT AUTHORITY, CENTRAL MASSACHUSETTS: Otoniel Orozco, who had trained in the culinary arts, was surprised to find himself working at—of all places—a transit agency. "I've always used public transportation. I could never drive," says Orozco, who is legally blind. "Somehow, I ended up here. The doors were open, the shot was given, and honestly, it's been such a great fit."

Those doors opened because the MetroWest Regional Transit Authority in Central Massachusetts has led a pioneering effort to hire people with a range of disabilities, including individuals who are blind, people who have mobility disabilities, and those with developmental

disabilities. People with disabilities comprise 20 percent of MetroWest's workforce across a diverse range of roles. "It really was our benefit," affirms Eva Willens, deputy administrator of MetroWest. "We got some great employees, and we still have them to this day."

Since its inception in 2007, MetroWest has partnered with agencies that include the Massachusetts Commission for the Blind, Employment Options, MetroWest Center for Independent Living, the Perkins School for the Blind, and the Carrol Center for the Blind. Orozco, assistant manager of the MetroWest call center, connected with the transit agency through such a partnership. Agency partners also assist MetroWest in understanding what job accommodations employees with disabilities will need and provide support to these employees along the way. Liz Gulachenski, a representative from Employment Options, comments about a person the organization connected with MetroWest: "They treat her well and respect her. She actually hasn't needed us for mental health disability services in a while."

Orozco knows that he and his colleagues with disabilities bring unique qualities to MetroWest: "the real-world experience to be able to relate to the demographic we serve." Jim Nee, the agency's director, agrees that employees with disabilities bring a distinctive value, not only to the jobs they perform within transit but also to their colleagues without disabilities. "There's no amount of training that I could do or pay for that would be even close to the benefit of having a staff [member] who has that real-world experience," Nee adds.

#### CENTRAL OHIO TRANSIT AUTHORITY, COLUMBUS,

OHIO: Similarly, Central Ohio Transit Authority (COTA) in Columbus, Ohio, has strengthened its workforce and career pipeline by recognizing the value of accommodating young people with learning disabilities who are participating in its pre-apprenticeship technician program. While mentoring these young people through a partnership with the Columbus City Schools, COTA realized that some of the participants had diverse ways of learning and had likely been supported in high school through individualized education programs, which focused on their specific needs.

The agency worked to determine what barriers to success might exist, exploring ways to train, ask questions, and build its staff's skills in aligning communication and training content to fit the individual's learning style. "This is just what you do as a good trainer: Recognize that people learn differently," explains Tracy Spikes, COTA's Workforce Development senior program manager.

She also notes that, as they made these adjustments, some of the current technicians realized that they had the same challenges and that these accommodations worked for them, too. Spikes underscored the benefits, emphasizing that, "COTA gets another good employee who—with some special attention— now has the confidence to succeed. This approach provides us with a well-rounded and diverse workforce and helps us live up to our motto: Moving Every Life Forward."

# **Reasonable Accommodations**

Modifications to a job, work environment, or hiring process to enable access for a person with a disability make these success stories possible. However, transit agencies are not on their own in figuring out how to navigate legally required accommodations for their employees. Agencies, such as the U.S. Equal Employment Opportunity Commission and the U.S. Department of Labor's Office of Disability Employment Policy (ODEP), provide extensive guidance in this area. In particular, ODEP's Job Accommodation Network provides free, confidential guidance on job accommodations for employers and employees.

Disability accommodations will become all the more important as the transit workforce ages. Among transit and intercity bus drivers, 72 percent are age 45 or older, and the average age of such drivers is more than 10 years older than the average American worker (4). In the United States, about 40 percent of adults aged 65 or older have a disability, compared with only 26 percent of all adults (5). Evidence suggests that many people who have agerelated disabilities do not think of themselves as disabled (6). These employees may be less likely to know their rights to reasonable accommodations or think to ask for them. Their disabilities can also be invisible and therefore go unperceived by the employer, until they are disclosed.

Cape Cod Regional Transit Authority in Massachusetts has strengthened its workforce by actively reaching out to older adults in its recruitment efforts. The agency also proactively recognizes that retaining excellent employees may require appropriate accommodations, which includes allowing time for additional medical appointments (7). Such awareness and anticipation of disability accommodations will benefit transit agencies in the short and long run.

# **Performance Measurement**

It is not sufficient for an agency or organization to implement recruitment or retention strategies without measuring outcomes. Hiring administrators must continuously evaluate these practices to determine if the strategies are achieving the desired results. It is easy to count outputs related to hiring, such as the numbers of employees with disabilities in the workplace, or the number of contacts or relationships with disability-focused hiring organizations. However, it is more difficult to measure the outcomes of having a diverse workforce that includes people with disabilities. The following are examples of outputs related to people with disabilities in the workforce:

• Increase in the number of people with disabilities in the work setting; • Increase in career advancement opportunities; • Increase in the number of people with disabilities in work teams; • Increase in the number of people with disabilities as decision leaders, managers, and supervisors; • Increase in the number of meaningful relationships with recruitment sources; • Decrease in the number of Americans with Disabilities Act (ADA)–related reports and incidents; and • Decrease in staff turnover attributed to ADA issues.

Likewise, the following are examples of outcomes related to including people with disabilities in the workforce:

- Increase in the percentage of employees (with and without disabilities) reporting positive perceptions of the work setting and specifically referencing diversity, Full integration of inclusive recruitment and retention policies and practices that become common in the work setting,
- Decrease in the overall costs of turnover,
   Increase in the production of work products and services that reflect inclusive practice and regard for people with disabilities, and
   Increase in career ladder opportunities and positions of authority for employees with disabilities.

#### Conclusion

People with disabilities deserve to have the same career expectations as those without disabilities, including job security, interesting assignments, career advancement opportunities, and a feeling of usefulness to society. Transit jobs have all of these qualities and more. Transit can be more equitable if the industry fosters a more inclusive workplace that reflects its riders and also if strategically targeted recruitment and retention of employees with disabilities promise to ease some of the strain of deepening labor shortages.

oonlinepubs.trb.org/onlinepubs/trnews trnews346Workforce.pdf



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# **Transportation Leaders Against Human** Trafficking Awareness Campaign

very year, millions of men, women, and children are held against their will and trafficked into forced labor and commercial sex. Human traffickers exploit roadways, railways, waterways, and airways in urban, rural, and Tribal communities across the United States to recruit and transport their victims. DOT's Transportation Leaders Against Human Trafficking (TLAHT) Awareness Campaign aims to educate and empower travelers and employees across all modes of transportation to recognize and report suspected instances of human trafficking.

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DOT's "Combating Human Trafficking in the Transportation Sector Awareness Training" (English/Spanish) for travelers and transportation personnel underscores the intersection of human trafficking and transportation, provides general and transport-specific indicators of human trafficking, and how to report a tip.

Bilingual multimodal signs, modal posters, pocket cards, modal graphics, visor cards, and social media graphics are tailored for use in airplanes and airports, buses and bus stations, trains and rail stations, rest areas and travel centers, ports, and other places where human trafficking may occur. Campaign materials include a QR code that links to the TLAHT awareness campaign page with modespecific indicators and reporting methods.

When reporting suspected human trafficking activity, it is critical to include as many details as possible. Start by including basic information such as the method of transportation, point of departure, and final destination. Provide as much information about the suspected victim and trafficker as you can, including their physical descriptions. If known, include other identifiers, such as

their names, date of birth, passport or driver's license number, citizenship, telephone number, address, or the license plate of an involved vehicle. Then describe exactly what you saw or heard in detail. Keeping detailed notes can be helpful.

When encountering suspected instances of human trafficking, do not alert the suspected victims or traffickers by confronting them or drawing unnecessary attention to yourself. Ensure the safety of the suspected victim, yourself, and others by reporting your tip as soon as possible.

Reporting suspected human trafficking is always the right thing to do. By itself or combined with other information, your tip may help law enforcement build a case against a trafficker and help a victim. Reporting also helps to identify potential "hot spots" of activity that could help law enforcement break up a trafficking ring.

# **REPORT A TIP**

Emergency	911
National Human Trafficking Hotline	1-888-373-7888; Text INFO or HELP to BeFree (233733)
Homeland Security Investigations Tip Line	866-DHS-2-ICE (866- 347-2423)

transportation.gov/TLAHT/campaign

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# **AVAILABLE TRAINING PROGRAMS**

The following is a list of the training programs and course length of each that are currently available to rural transit providers through Missouri RTAP. Requests for training can be made by contacting Pat Diaku, MO-RTAP Program Specialist, at <u>diakup@mst.edu</u> or 573-341-6155.

- 1. ACTIVE SHOOTER PREVENTION AND RESPONSE 2 HOURS.
- 2. AGGRESSIVE DRIVING -1 HOUR.
- 3. ASSAULT AWARENESS AND PREVENTION FOR TRANSIT OPERATORS 1.5 HOURS
- 4. BACKING SAFETY 1 HOUR.
- 5. BASIC FIRST AID 1 HOUR.
- 6. BLOOD BORNE PATHOGENS 1 HOUR.
- 7. CPR & BASIC FIRST AID 4 HOURS.
- 8. DEALING WITH DIFFICULT PASSENGERS 2 HOURS.
- 9. DEFENSIVE DRIVING 3 HOURS.
- 10. DISTRACTIVE DRIVING 1 HOUR.
- 11. DIVERSITY & AWARENESS TRAINING PROVIDING QUALITY CUSTOMER SERVICE FOR TRANSPORTATION PASSENGERS WHO HAVE DISABILITIES 2 HOURS.
- 12. DRIVEN TO EXTREMES 1 HOUR.
- 13. DRUG & ALCOHOL AWARENESS
   1 HOUR.
- 14. EMERGENCY & EVACUATION PROCEDURES 1 1/2 TO 2 HOURS.

- 15. FATIGUE AWARENESS FOR DRIVERS 2 HOURS.
- 16. HIPAA 1 HOUR.
- 17. NIGHT DRIVING 1 HOUR.
- 18. OPERATION LIFESAVER HIGHWAY-RAIL CROSSING SAFETY 1 HOUR.
- 19. PASSENGER ASSISTANCE/MOBILITY AID SECUREMENT
   2 HOURS.
- 20. REASONABLE SUSPICION TRAINING FOR SUPERVISORS

   2 HOURS.
- 21. SAFE & SECURE PROPER INFANT AND CHILD SEAT INSTALLATION 2 HOURS.
- 22. SENSITIVITY AWARENESS 1 HOUR.
- 23. SEXUAL HARRASSMENT 1 HOUR.
- 24. SLIPS, TRIPS AND FALLS 1 HOUR.
- 25. VIOLENCE IN THE TRANSIT WORKFORCE –
  PREVENTION, RESPONSE AND RECOVERY 1.5
  HOURS
- 26. WHEELCHAIR SECUREMENT 2 TO 3 HOURS DEPENDING ON NUMBER OF PARTICIPANTS.
- 27. WINTER DRIVING SAFETY 1 HOUR.

For more information on classes and to register please visit: mltrc.mst.edu/mortaphome/mortaptraining/

# National RTAP – Rural Transit Assistance Program

www.nationalrtap.org/

Transportation Safety Institute –
Transit Safety & Security Training Division
www.tsi.dot.gov/Transit.aspx

Federal Transit Administration – Rural Transit Assistance Program Page www.fta.dot.gov/funding/grants/ grants\_financing\_3554.html

Missouri Public Transit www.mopublictransit.org/

National Transit Institute www.ntionline.com/

# Kansas RTAP – Kansas University Transportation Center

www.kutc.ku.edu/cgiwrap/kutc/rtap/index.php/index.html

Transportation Research Board's (TRB) Transit Cooperative Research Program (TCRP) www.tcrponline.org/

