



TITLE VI PROGRAM UPDATE

2025

Stanislaus Regional
Transit Authority



2025 TITLE VI PROGRAM UPDATE

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INTRODUCTION

The purpose of the Title VI Program Update is to document the steps the Stanislaus Regional Transit Authority (StanRTA) has taken and will take to ensure that StanRTA provides services without excluding or discriminating against individuals on the basis of race, color, and national origin. In addition to the Title VI protected categories, StanRTA will take steps to ensure that our programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

StanRTA's Title VI Program follows the guidance provided in the Federal Transit Administration (FTA) Circular 4702.1B, meeting or exceeding federal requirements. The Title VI Program covers Chapter III requirements for all recipients and Chapter IV requirements for Fixed Route Transit Providers. The Board approved Title VI policies that were developed in accordance with the approved public participation plan. StanRTA's Service Standards were adopted by the Board, as well as the Results of the Service Monitoring. These policies were followed when a Service Equity Analysis was conducted for the proposed changes to Routes 33 and 70 in December 2024. StanRTA's Language Assistance Plan provides language assistance to the Limited English Proficient (LEP) members of the region we serve and tools for StanRTA staff to use when communicating with LEP customers.

This Title VI Program Update is being submitted to FTA in accordance with FTA's Concurrence letter sent to StanRTA on March 2, 2023. In the Concurrence letter, FTA informed StanRTA that our Title VI Program Update, submitted on August 1, 2022, met the requirements set out in the FTA Title VI Circular, 4702.1B, and that the agency's next Title VI Program Update would be due October 1, 2025. A copy of this letter is included in [Appendix A](#). The 2023 letter approved StanRTA's program with some recommended changes, formally termed *Concurrence– With Comments*. When comments are issued, the FTA is essentially requesting an agency to provide additional clarification on the approved content within the plan. StanRTA promptly implemented those corrective actions, which were reviewed and accepted by the FTA during the triennial review conducted in 2024.

2022 Plan Comments

The FTA Office of Civil Rights (OCR), in its Letter of Concurrence issued in March 2023, approved StanRTA's program with some recommended changes. These changes are reflected in the 2022 Title VI Program as well as the 2025 Program Update contained herein. Those changes include:

Item	Resolution
Revised Public Notice.	Added text clarifying that complainants can file Title VI complaints with the FTA in addition to the local agency
Add more detail on alternative formats to the complaint form and procedures.	Added more explicit language identifying options available.
Add a description of how minorities are encouraged to participate on boards and committees.	More information explaining StanRTA's recruitment and selection process was added to the plan's narrative.
Add a description of how the Language Access Plan (LAP) is monitored, evaluated, and updated.	Language added
Clarify that all staff are provided training on language assistance to LEP populations.	Clarified that all staff are educated on the language assistance programs made available by StanRTA and our contractor.
Include the Major Service Change policy, Disproportionate Burden policy, and Disparate Impact policy as part of the Program.	Policies, originally referenced by resolution, were included in their complete form.
Include a description of the public engagement process used for setting the Major Service Change Policy, Disproportionate Burden policy, and Disparate Impact policy.	A list of specific activities for each policy was added to the plan.

This Program Update covers the period December 1, 2022, to November 30, 2025. Originally due on October 1, 2025, the plan's filing date was extended to December 15, 2025, in an email issued by Nicholas Sun, Chief, FTA Civil Rights Oversight Division, on September 9, 2025.

We are pleased to submit the 2025 Title VI Program Update.

EXECUTIVE SUMMARY

The Stanislaus Regional Transit Authority (StanRTA) is a public transit system serving the communities of Stanislaus County. Established in 2021 as a single-purpose joint powers authority (JPA), StanRTA was formed by merging transit services previously operated by the City of Modesto and Stanislaus County. It serves all areas of the county except for Turlock and Denair, which are serviced by Turlock Transit.

StanRTA operates 23 fixed routes and three commuter services. The fixed routes consist of a mix of frequent services (operating every 15-20 minutes), local services (with 30-minute intervals within a community), and intercity services (running every 60 minutes between communities). The commuter services connect residents to major transit destinations outside the area, including BART, ACE Rail, and San Joaquin RTD.

During peak service, StanRTA has 63 vehicles in operation. With a population of just under 500,000 residents, StanRTA is classified as a large urban provider, a designation that requires additional reporting responsibilities under Title VI.

Figure 1. StanRTA Service Area Map



StanRTA also offers the required complementary paratransit service. Additionally, StanRTA provides demand responsive services, Medivan, a daily service from the Modesto Transit Center to major medical facilities throughout the San Francisco Bay Area, and Dial-A-Ride services available to the general public in the communities of Oakdale, Patterson, and Riverbank. ADA paratransit services are offered 365 days a year, while the fixed-route service operates seven days a week and every day of the year but for six holidays. Weekday service operates between 4:45 am and 11:00 pm, with Saturday service running from 6:00 am to 10:00 pm and Sunday service operating from 9:00 am to 8:00 pm.

Title VI of the Civil Rights Act of 1964 provides that "no person in the United States shall, on the ground 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" (42 U.S.C. Section 2000). The Federal Transit Administration (FTA) is responsible for ensuring that recipients of its funding comply fully with Title VI in their planning and implementation processes. Under Title 49 U.S.C. Chapter 53, as amended, StanRTA is a designated recipient of funds under FTA sections 5307.

TITLE VI PROGRAM

StanRTA operates its service without regard to race, color, or national origin and is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services based on race, color, or national origin, as outlined by the provisions in Federal Transit Administration (FTA) circular 4702.1.B. StanRTA adheres to both the General Title VI requirements (Chapter III) and the Requirements of Fixed-Route Transit Providers (Chapter IV). The 2025 Title VI Program is an updated assessment of StanRTA's Title VI Program, covering the time period between December 1, 2022 and November 30, 2025, and includes the following General and Transit-specific requirements per [Appendix A](#) of FTA circular 4702.1B:

General Requirements (Chapter III)

1. Title VI Notice to the Public, including locations where the notice is posted
 - Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
 - Title VI Complaint Form
 - List of transit-related Title VI investigations, complaints, and lawsuits
2. Public Participation Plan, including information about outreach methods to engage Minority and limited English proficient populations (LEP), and a summary of outreach efforts made since the last Program submission
3. Language Assistance Plan for assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
4. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
5. A description of how the agency monitors its subrecipients for Title VI compliance, and a schedule of subrecipient Title VI Program submissions
6. A Title VI equity analysis if the agency has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
7. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved of the Title VI Program

As a large, urban, fixed-route transit operator, StanRTA must also comply with the following requirements:

Requirements of Transit Providers (Large) (Chapter IV)

1. Service Standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On-time performance for each mode
 - Service availability for each mode
2. Service Policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode
3. Demographic and service profile maps and charts
4. Demographic ridership and travel patterns, collected by surveys
5. Results of their monitoring program and report, including evidence that the board or other governing entity or official(s) considered, were aware of the results, and approved the analysis
6. A description of the public engagement process for setting the “major service change policy,” disparate impact policy, and disproportionate burden policy
7. Results of service and/or fare equity analyses conducted since the last Title VI Program submission, including evidence that the board or other governing entity or official(s) considered, were aware of, and approved the results of the analysis

In the following pages, these requirements will be individually addressed. Where useful, supplemental forms and documentation supporting StanRTA’s responses will be appended.

OVERVIEW OF THE TITLE VI PROGRAM

StanRTA is committed to civil rights compliance, which is a fundamental part of our mission and vision as a community-based public transit provider. A key component of our Title VI Program is to integrate Title VI awareness into all agency activities and to enhance the overall knowledge within the agency. Our efforts to update this Program have helped us develop practices that ensure ongoing compliance with Title VI principles.

In line with these principles, StanRTA translates most public documents and materials into Spanish to assist constituents with Limited English Proficiency (LEP). More information on the topic is provided later in this report.

GENERAL REQUIREMENTS (CHAPTER III)

1. TITLE VI NOTICE and POLICY, COMPLAINTS, PROCEDURES, and FORMS

“StanRTA operates its service without regard to race, color, or national origin and is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services on the basis of race, color, or national origin, as outlined by the provisions in Federal Transit Administration (FTA) circular 4702.1.B

Program Objectives

StanRTA’s Title VI Program goals are:

- Ensuring that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promoting full and fair participation in public transportation decision-making without regard to race, color, or national origin;
- Ensuring meaningful access to transit-related programs and activities by persons with limited English proficiency

Notices


The Notice to Beneficiaries contains a commitment to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color, or national origin as protected by Title VI, and details about how to get more information about StanRTA’s Title VI Program, including instructions for filing a Title VI complaint. It includes the agency’s mailing address, telephone number, and online contact information. Samples of the posted notices are included here as Figure 2 and Figure 3. The notices are posted in various ways, both electronically and physically, as well as in publications such as rider’s guides. Among the posting locations for the Title VI notice are:

Figure 2. Non-discrimination policy statement in English

The S Nondiscrimination Statement


The Stanislaus Regional Transit Authority (StanRTA) is committed to a policy of nondiscrimination in program services pursuant to the requirements of Title VI of the Civil Rights Act of 1964, which provides that no person 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 its program of transit services delivery. Any person who believes that they have been subjected to discrimination on the basis of race, color or national origin may file a complaint with The S.

Email: info@stanrta.org
Phone: (209) 527-4900
Mail:
StanRTA,
Title VI Administrator
912 11th Street, Suite 100
Modesto CA 95354



Scan the QR code to submit
stanrta.org/146/Submit-a-Comment

A complaint may also be filed with the
Federal Transit Administration (FTA) Office of Civil Rights via mail:
Federal Transit Administration Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor - TCR 1200 New Jersey Avenue
SE Washington, DC 20590
or email FTAcivilrightscommunications@dot.gov.



Card # **7** DO NOT REMOVE

Figure 3. Non-discrimination policy statement in Spanish

La declaración de no discriminación de La S

La Autoridad de Tránsito Regional de Stanislaus (StanRTA) está comprometida con una política de anti-discriminación en los servicios del programa establecidos de acuerdo con los requisitos del Título VI de la Ley de Derechos Civiles de 1964, que establece que ninguna persona, por motivos de raza, color u origen nacional, sera excluido de la participación en, ser negado los beneficios de, o ser objeto de discriminación bajo su programa de servicios de tránsito. Cualquier persona que crea que ha sido objeto de discriminación por motivos de raza, color, u origen nacional puede presentar una queja ante La S.

Correo Electronico:
info@stanrta.org
Telefono: (209) 527-4900
Correo:
StanRTA,
Title VI Administrator
912 11th Street, Suite 100
Modesto CA 95354



Escanea el código QR para enviar
stanrta.org/146/Submit-a-Comment

También se puede presentar una queja ante la
Oficina de Derechos Civiles de la Administración
Federal de Tránsito (FTA) por correo postal:
Administración Federal de Tránsito Oficina de Derechos Civiles
A la atención de: Equipo de Quejas
Edificio Este, 5.º piso - TCR 1200 New Jersey Avenue
SE Washington, DC 20590
o por correo electrónico a FTAcivilrightscommunications@dot.gov.



Card # **7** DO NOT REMOVE

StanRTA does not discriminate against any person with respect to any federally-assisted transit program or service. StanRTA provides information regarding its Title VI obligations to the public using a variety of methods. Information, including references to FTA circulars, the Transit Title VI program, and the Title VI complaint procedure, is posted in the following locations:

Notice Location Type	Notice Location
Buses	Posted in the ad card area of the fixed-route buses, posted on demand response vehicles
Public Ticketing Office	Customer Service Window Modesto Transit Center 1009 9 th Street, Modesto, CA
Public Gathering Areas	Public Seating Area Modesto Transit Center Lobby 1009 9 th Street, Modesto, CA
StanRTA Lobby	912 11 th Street, Suite 100 Modesto, CA
Major Transit Centers	Modesto Transit Center Kiosk 1009 9 th Street, Modesto, CA

Complaint Procedures

StanRTA has a robust complaint process that allows individuals to file a Title VI complaint through multiple methods, including phone calls, the website, written submissions, or in-person visits to Customer Service. Additionally, complaints can be submitted using "Ask the S," a smartphone application for constituent inquiries. Regardless of the method chosen to file a complaint, the procedures and forms remain the same. Samples of the complaint procedure and policy are available in both English and Spanish in [Appendix B](#), along with sample complaint forms in both languages.

List of Complaints

All complaints received are compiled in the Ask the S database and processed by the agency’s administrative staff. All individuals making a Title VI complaint shall be notified in writing of the protections and due process procedures available to them as provided by Title VI.

There were no lawsuits or lengthy investigations during this reporting period. There was a total of 17 complaints, either alleging racial discrimination or referencing keywords that could indicate racial discrimination. No credible claims were substantiated. In several cases, bus operators received coaching in customer service and de-escalation techniques.

The list of Title VI complaints, with names and personal details of the complainants redacted, is in [Appendix C](#).

2. PUBLIC PARTICIPATION PLAN

StanRTA's Board of Directors adopted its original Public Participation Plan in September 2021 and updated it in March 2024. The complete plan, designed to ensure compliance with FTA requirements for a locally developed public participation process, allows for public comments before raising fares or implementing significant changes in transportation services. This plan can be found in [Appendix D](#).

StanRTA recognizes the importance of engaging with the community through various public meetings and workshops. These interactions help us share information about transit programs, activities, and services while also enhancing our understanding of the community we serve. A summary of the community outreach activities conducted during this reporting period is included in [Appendix E](#).

During these discussions, transit staff gather input on transportation issues and concerns from disadvantaged citizens, including senior citizens, minorities, low-income individuals, and persons with physical or cognitive disabilities. All StanRTA-sponsored meetings and activities are held in ADA-accessible locations and are easily reachable via public transit services, including both fixed-route and paratransit options.

We widely share information about public outreach meetings on our website, social media platforms, at the Transit Center, on buses, and through social service agencies. This ensures that all transit users and interested citizens have the opportunity to participate in the decision-making process.

Additionally, we hold regular meetings with local agency representatives and riders to ensure that information about the paratransit system is effectively communicated and that rider concerns and questions are addressed.

3. LANGUAGE ASSISTANCE PLAN

In accordance with Title VI, the Department of Transportation's implementing regulations, and Executive Order 13166, StanRTA takes reasonable steps to ensure meaningful access to its benefits, services, information, and other important transit activities for individuals who are limited-English proficient (LEP).

To facilitate meaningful access to StanRTA programs and services for individuals with limited English proficiency, a Language Assistance Plan (LAP) has been developed (see [Appendix F](#)). This plan serves as a training tool and guide for transit staff on how to identify individuals who may need language assistance and how to provide that support.

Local demographic data indicates a need for language assistance within the Spanish-speaking community. StanRTA is committed to supporting the community through its LEP program, providing key documents in both English and Spanish. Whenever feasible, StanRTA strives to create

documents that incorporate both languages so that equal access is ensured. This includes essential materials such as fare cards, route brochures, and car cards. Additionally, any notices regarding temporary service changes are posted on the website, at key transit locations, and prominently displayed on all buses in both English and Spanish.

StanRTA and our operations contractor utilize language interpretation services for online and telephonic support when communicating with consumers who are not proficient in English. Staff members receive regular training on the available services and have written procedures to reinforce this training. Frontline staff are trained to reach out to dispatch for real-time language assistance. The customer service department, which frequently interacts with LEP populations, includes bilingual supervisors and representatives to assist Spanish-speaking riders. Furthermore, staff members who participate in outreach events are always part of a multilingual team, prepared to engage with the community in their preferred language.

The LAP is in [Appendix F](#).

4. MEMBERSHIP OF TRANSIT-RELATED DECISION-MAKING BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that the recipient of a federal transit grant may not, on the grounds of race, color, or national origin, deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of a program.

Board of Directors

The StanRTA is governed by a seven-member Board of Directors. The organization’s bylaws specify that the City of Modesto and the County of Stanislaus will each appoint two members from among their elected officials. A fifth member represents the other cities in Stanislaus County. This position is required to be an elected representative from among the other jurisdictions. The remaining two members of the board are selected through an open application process. These two members are required to represent riders or agencies that represent rider groups.

The ethnicities of the StanRTA Board of Directors, as of October 2025, are as follows in Figure 4:

Figure4. Board Member Race/Ethnicities

Race/Ethnicity	Number
White	5
Black/African American	1
Hispanic or Latino	1

StanRTA Equity and Accessibility Advisory Committee

In 2023, the Board of Directors formed the StanRTA Equity and Accessibility Advisory Committee (SEAAC), intending to provide a focused voice representing diverse public interests on matters of transit service. The SEAAC is an 11-member group representing constituencies throughout Stanislaus County, transit users, individuals with disabilities, and representatives of community-

based and social service agencies. The members are appointed for staggered two-year terms and can serve for up to four terms. The SEAAC’s role is expressly to advise the Board of Directors on equity and ADA issues related to transit service, service planning, and fares.

SEAAC members are solicited through a variety of means in accordance with the Public Participation Plan, which includes methods such as:

- advertising on social media
- posts on the StanRTA website
- text and email alerts to ADA paratransit consumers
- placing ads on fixed route buses
- promotion on community newsletters and websites
- direct outreach to community service agency partners

The SEAAC is an engaged and active voice representing the needs of transit users. StanRTA attributes several factors to the group’s success, including:

- Members are paid a \$50 stipend per meeting
- Meetings are live-streamed, providing meaningful exposure to the committee’s work
- StanRTA board members routinely attend SEAAC meetings
- Members see their suggestions shape outcomes at the Board of Directors level
- Members interact with the operations contractor in meaningful ways, such as participating in sensitivity and wheelchair securement training

The self-reported racial and ethnic composition of the Committee is provided below:

Figure 5. SEAAC Member Race/Ethnicities

Race/Ethnicity	Number
White	7
Black/African American	1
Hispanic or Latino	3

5. SUBRECIPIENTS

There are no subrecipient agencies under StanRTA.

6. CONSTRUCTED FACILITIES

During the reporting period, StanRTA constructed no facilities nor acquired any property.

7. PROOF OF FORMAL APPROVAL OF THE TITLE VI PLAN

During its meeting on December 4, 2025, the StanRTA Board of Directors reviewed and voted to approve the plan. The board resolution that documents this decision and includes all relevant findings can be found in [Appendix M](#).

REQUIREMENTS OF TRANSIT PROVIDERS (CHAPTER IV)

In addition to the above general reporting requirements, FTA Circular 4702.1B requires providers of fixed route public transportation to submit additional information specific to fixed route service. As the StanRTA operates fifty or more fixed route vehicles in peak service, it is subject to complete reporting requirements for system-wide standards and policies. [Appendix G](#) contains the Board of Directors' resolution approving these policies as part of the adoption of this Title VI Program.

Title 40 CFR Section 21.5(b)(2) specifies that a recipient shall not utilize criteria or methods of administration that have the effect of subjecting persons to discrimination because of their race, color, or national origin. In addition, Appendix C to 49 CFR Part 21 establishes that no person or group of persons shall be discriminated against with regard to routing, scheduling, or quality of service on the basis of race, color, or national origin. Frequency of service, age, and quality of vehicles assigned to routes, quality of stations serving different routes, and locations of routes may not be determined based on race, color, or national origin. StanRTA's approved standards cover the following elements, as required by C4702.1B:

- Vehicle load for each mode
- Vehicle headway for each mode
- Service availability for each mode
- On-time performance for each mode

Discussion of each standard follows.

1. SERVICE STANDARDS

The StanRTA has established the following service standards and policies to comply with regulations regarding vehicle loads, vehicle headways, service availability, and on-time performance. These standards were developed as part of the Comprehensive Operational Analysis (COA) conducted in 2022 and were approved by the Board of Directors on June 23, 2022.

Prior to the Board's approval, the standards were made available for public review on the StanRTA website, presented during a Zoom community forum, and discussed at an outreach meeting. These outreach methods are congruent with those recommended in the Public Participation Plan. Supporting documentation for these standards can be found in [Appendix G](#).

Vehicle Load Standard

The vehicle loading standard is differentiated between peak periods, times of day when the most riders want to use public transit, typically the hours of 7 am – 9 am and 4 pm – 6 pm on weekdays. During those peak periods, it is accepted that bus occupancy will be stretched further than during the off-peak periods of the day. StanRTA's standard, in line with industry norms, is to allow up to 1.5 times the seated capacity during peaks. The calculation of those numbers, based on the capacity of various bus models, follows.

Peak

The average loads during the peak operating period should not exceed each bus's achievable capacity. Peak loads are:

<u>Bus Type</u>	<u>Passenger Capacity</u>
Low Floor 35'	45
Low Floor 40'	54
Standard 35'	50
Standard 40'	63

Off Peak

The average passenger load during off-peak hours should not exceed the number of seats in the bus. Seating capacities are:

<u>Bus Type</u>	<u>Seats</u>
Low Floor 35'	30
Low Floor 40'	36
Standard 35'	33
Standard 40'	41

Vehicle Headway Standard

Headway is the time interval between scheduled runs of a bus route. Scheduling involves the consideration of a number of factors, including ridership productivity, transit/pedestrian-friendly streets, density of transit-dependent population and activities, relationship to the municipal general plans, the StanCOG regional transportation plan, relationship to major transportation developments, land use connectivity, and transportation demand management. As noted in the Service Standards adopted by the StanRTA Board of Directors in May 2022, the headway standards for the various fixed-route services operated by the StanRTA are as follows:

- **High Frequency:** Routes that provide a higher level of service along a high ridership corridor, with frequencies of at least 15 minutes during the peak and 30 minutes during off-peak.
- **Local:** Routes that generally provide travel within a community, and transportation between major transfer points, employment centers, shopping areas, and other points of interest.
- **Intercity Connector:** Routes that provide service between towns and cities.
- **Commuter:** Routes that provide express (limited stop) service during limited, high-demand hours

On-Time Performance Standard

Eighty-five (85%) percent of vehicles will complete their established runs no more than five (5) minutes late and without departing any mid-route bus stops more than zero (0) minutes early.

Service Availability Standard

Service availability in transit is typically a geographic standard referring to the proximity of bus service to population centers. The StanRTA's Service Availability Standard policy states:

“The S maintains a service availability goal that 65% of residents within its service area live within three-quarters (3/4) mile of a bus route.”

2. SERVICE POLICIES

Service standards reflect performance metrics, while service policies focus on the qualitative aspects of transit services. These qualitative characteristics include the amenities available to customers. For example, the components at bus stops may consist of items such as seating, lighting, shelters, trash receptacles, and bicycle racks. Most transit agencies have staggered schedules for acquiring and replacing their bus fleets. This means that buses of different ages, from the newest models to those showing signs of wear and tear, are in service every day. Ensuring that all communities are served by the various vintages of buses is essential to equity.

Vehicle Assignment Policy

The StanRTA Vehicle Assignment Policy was approved by the Board of Directors in June 2022. The policy states

“All buses have the same level of amenities available to riders. Buses are assigned randomly, with exceptions made only in the circumstances required by fuel/charge range issues or route conditions.”

Transit Amenities Policy

The StanRTA Transit Amenities Policy was approved by the Board of Directors in May 2022. The policy states,

“Transit amenities, including shelters and benches, are distributed on a system-wide basis. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and site constraints.”

3. DEMOGRAPHIC AND SERVICE PROFILE MAPS

Demographic and service profile maps were created for the Title VI Program Update and are presented in [Appendix H](#). The attached maps include the service area and all StanRTA bus routes, effective Fall 2025.

- **Map 1** shows the population in the StanRTA service area broken down by census block.
- **Map 2** highlights the poverty level in Modesto,
- **Map 3** shows the poverty level in the service area.
- **Map 4** shows the poverty level by census block in the greater Modesto area
- **Map 5** shows Spanish Speakers with Limited English Proficiency in the service area
- **Map 6** shows Spanish Speakers with Limited English Proficiency in the Modesto area.
- **Map 7** shows Minority populations in the service area
- **Map 8** shows minority populations by census block in Modesto

4. DEMOGRAPHIC RIDERSHIP AND TRAVEL PATTERNS (SURVEYS)

This Program Update incorporates findings from the latest rider survey conducted by StanRTA from late September to early October 2025. A summary report of the survey is included as [Appendix I](#). This survey is conducted annually, and the results are shared with the SEAAC, the Board of Directors, and the community.

5. MONITORING PROGRAM AND REPORT

The Federal Transit Administration (FTA) requires providers of public transportation that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more in population to monitor the performance of their transit system relative to their system-wide service standards and service policies (i.e., vehicle load, vehicle assignment, transit amenities, etc.) not less than every three years. Staff assessed the performance of each route according to the methods described in the FTA Circular, which lays out the following methodology:

- Identify routes as Minority or non-Minority transit routes. A route that has at least one-third of its total revenue mileage in a Minority census block group is considered a minority route.
- Assess the performance of each Minority and non-Minority route for each of the transit provider's service standards and service policies.
- Compare the transit service observed in the assessment to the transit provider's established service policies and standards.
- For cases in which the observed service for any route exceeds or fails to meet the standard or policy, analyze why the discrepancies exist and take steps to reduce the potential effects.
- Evaluate transit amenities policy to ensure amenities are being equitably distributed throughout the transit system.
- Develop a policy or procedure to determine whether disparate impacts exist based on race, color, or national origin, and apply that policy or procedure to the results of the monitoring activities.
- Submit the results of the Monitoring Program, as well as documentation to verify the Board's awareness, consideration, and approval of the monitoring results to FTA every three years as part of the Title VI Program.

The Monitoring Program was presented to the SEAAC at its November 13, 2025, meeting, receiving a unanimous motion recommending that the Board of Directors approve the results of the program.

The Board of Directors approved the Monitoring Program on December 4, 2025.

The Monitoring Program is provided in [Appendix J](#).

6. PUBLIC ENGAGEMENT PROCESS FOR MAJOR SERVICE CHANGE POLICY

In 2024, StanRTA updated its Title VI Complaint, Major Service Change, Disparate Impact, and Disproportionate Burden policies to better reflect regulatory requirements. This adoption updated the policies originally adopted in 2022. Prior to the Board's consideration, the policies were reviewed by the StanRTA's Equity and Accessibility Advisory Committee (SEAAC) and in a publicly noticed meeting at the Modesto Transit Center and an online public information session. The updated policies are in [Appendix K](#).

7. RESULTS OF SERVICE OR FARE EQUITY ANALYSIS

Since the last Program Update, two service changes were proposed in December 2024. each requiring a service equity analysis under Federal Transit Administration (FTA) regulations due to its significant impact. The proposals identified for implementation in January 2025 were: 1) the extension of Route 33, adding nearly two miles to the route's length, and 2) the elimination of Route 80, the Stockton Commuter service.

The service equity analysis assesses whether a transit agency's planned adjustments to commuter or fixed bus routes constitute significant service changes. It also evaluates whether these changes disproportionately affect low-income households or minority communities by comparing these protected groups to the overall population served by the transit system. If the analysis reveals potential harm or insufficient benefit to these groups, alternatives to the proposed changes should be explored as part of the final recommendations.

Staff conducted service equity analysis studies for both Route 33 and Route 80. Before presenting the route proposals and the results of the equity analysis to the Board of Directors for consideration, they were shared with the Service Equity Advisory and Advisory Committee (SEAAC) and discussed at multiple public meetings.

For Route 33, the equity analysis established that extending the route's length constituted a significant service change. However, there was no evidence of a disparate impact or disproportionate burden associated with this route.

In the case of Route 80, the elimination of the Stockton Commuter service was also classified as a significant service change. The analysis indicated that, while the route primarily served a minority ridership, its elimination did not result in a disparate impact. However, a disproportionate burden was found for the route's low-income riders.

Copies of the equity analyses and staff report presented to the Board of Directors are included in [Appendix L](#).