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**GREENSVILLE**  
◆ V I R G I N I A ◆  
*...Growing Towards New Horizons*

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Jacqueline T. Jordan  
Election District 3

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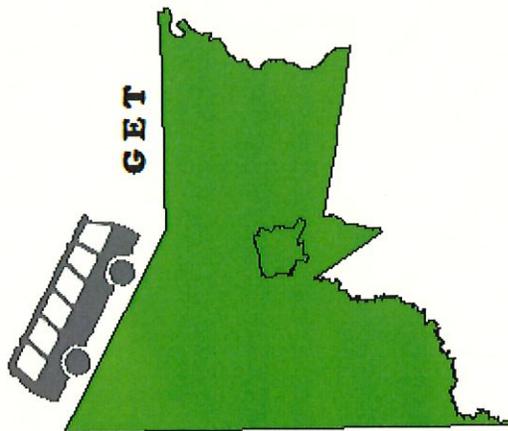
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## Title VI Plan and Procedures

### Title VI of the Civil Rights Act of 1964

## GREENSVILLE COUNTY

## GREENSVILLE COUNTY DEPARTMENT OF PUBLIC TRANSPORTATION



**Adopted: November 5, 2018**

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## I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI 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 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Virginia Department of Rail and Public Transportation (DRPT) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Greenville County Department of Public Transportation incorporates nondiscrimination policies and practices in providing services to the public. Greenville County Department of Public Transportation's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

## **II. OVERVIEW OF SERVICES**

### **MISSION STATEMENT**

To provide safe, reliable, affordable public transportation serving the Greenville Emporia area.

### **OVERVIEW**

The provision of public transportation has been cited as the highest priority to improve the quality of life in Emporia. The Greenville County Board of Supervisors has expressed its interest in the provision of public transportation a number of times.

The County of Greenville and the City of Emporia agreed to work together as a team to address this need. They recognized through their work with citizens that the lack of transportation is a barrier to access numerous essential services, as well as employment.

The Greenville County Department of Public Transportation system is designed to provide low cost regular transportation for residents of Greenville County and the City of Emporia.

It is their desire to provide the area with an efficient and effective transit route that connects residents more easily with employment, education, healthcare, essential government services, shopping and recreation through high quality, community oriented, transit services.

Initial routes are designed to reach most residential areas, shopping centers, medical care and other services within a one-hour time frame.

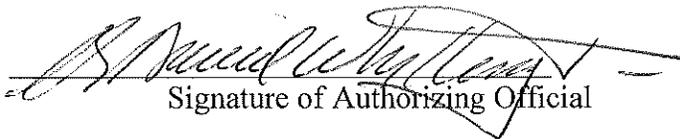
Buses will run from 7:00 a.m. until 7:00 p.m. each week day. The fare will be \$1 per ride.

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

Greensville County Department of Public Transportation is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

The Greensville County Department of Public Transportation Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

  
Signature of Authorizing Official

11/5/18  
Date

#### Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted); U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

#### **IV. NONDISCRIMINATION ASSURANCES TO DRPT**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Virginia Department of Rail and Public Transportation (DRPT) submits its annual certifications and assurances to FTA. DRPT shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, Greensville County Department of Public Transportation submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, Greensville County Department of Public Transportation confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

## V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Greenville County Department of Public Transportation Title VI Implementation Plan 2018-2020. I have reviewed and approved the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Greenville County Department of Public Transportation services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.



Signature of Authorizing Official

11/5/18

DATE

K. David Whittington, County Administrator

**See the following copy of the meeting minutes showing that the Greenville County Board of Supervisors have reviewed and approved the Title VI plan.**

At the Regular Meeting of the Greenville County Board of Supervisors, held on Monday, November 5, 2018, with Closed Session beginning at 5:00 P.M. and Regular Session beginning at 6:00 P.M., at the Greenville County Government Building, 1781 Greenville County Circle, Emporia, Virginia.

Present: Michael W. Ferguson, Chairman  
Raymond L. Bryant, Vice-Chairman  
Jacqueline T. Jordan  
Tony M. Conwell

In Re: Resolution #19-75 Title VI Plan and Procedures for the Greenville Emporia Transit

Mr. Reggie Owens addressed the Board of Supervisors stating that the Department of Rail and Transportation required the County of Greenville adhere to the Civil Rights Act of 1964 by having what they referred to as the Title VI Plan. He stated that the Title VI Plan covered the Civil Rights Act of 1964 recently with the addition of the Limited English Proficiency (LEP) Clause within the regulation. Mr. Owens stated that Staff was requesting approval of the following resolution to implement the updated policy.

**RESOLUTION #19-75  
TITLE VI PLAN AND PROCEDURES FOR THE GREENSVILLE EMPORIA TRANSIT**

**WHEREAS**, in accordance with the Federal Transit Administration (FTA) Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration Recipients; and

**WHEREAS**, The Greenville County Department of Public Transportation is a subrecipient of federal funds; and

**WHEREAS**, the purpose of a Title VI Program is to ensure non-discrimination in the subrecipient's services, programs and activities; and

**WHEREAS**, the Title VI Plan is required to be updated every three years; and

**NOW, THEREFORE, BE IT RESOLVED** that the Greenville County Board of Supervisors does hereby approve the updated Title VI Plan dated November 5, 2018.

Supervisor Bryant moved, seconded by Supervisor Jordan, to approve Resolution #19-75. Voting aye: Supervisors Bryant, Conwell, Jordan and Chairman Ferguson.

/s/Michael W. Ferguson, Chairman  
Greenville County Board of Supervisors

A TRUE COPY TESTE

  
Denise A. Banks, Clerk  
Greenville County Board of Supervisors

## **VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES**

The Greenville County Department of Public Transportation's Program Coordinator and Finance Supervisor are responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

### **Overall Organization for Title VI**

The Title VI Manager (Program Coordinator) and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

### **Detailed Responsibilities of the Title VI Manager**

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

## **General Title VI responsibilities of the agency**

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

### **1. Data collection**

To ensure that Title VI reporting requirements are met, Greenville County Department of Public Transportation will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

### **2. Annual Report and Updates**

As a sub-recipient of FTA funds, Greenville County Department of Public Transportation is required to submit a Quarterly Report Form to DRPT that documents any Title VI complaints received during the preceding quarter and for each year. Greenville County Department of Public Transportation will also maintain and provide to DRPT on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to DRPT updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Limited English Proficiency (LEP) plan
- procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

### **3. Annual review of Title VI program**

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

#### **4. Dissemination of information related to the Title VI program**

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the “public outreach and involvement “section of this document, and in other languages when needed according to the LEP plan as well as federal and State laws/regulations.

#### **5. Resolution of complaints**

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Greenville County Department of Public Transportation will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency’s Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to DRPT.

#### **6. Written policies and procedures**

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

#### **7. Internal education**

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), and required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

**Title VI training is the responsibility of Program Coordinator and Finance Supervisor.**

#### **8. Title VI clauses in contracts**

In all federal procurements requiring a written contract or Purchase Order (PO), Greenville County Department of Public Transportation’s contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Finance Supervisor who is/are responsible for procurement contracts and PO’s to ensure appropriate non-discrimination clauses are included.

## **VII. PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT**

### **Requirement to Provide a Title VI Public Notice**

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Greenville County Department of Public Transportation shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc.

**A copy of Greenville County Department of Public Transportation Title VI Public Notice is attached as APPENDIX G.**

- **Title VI Complaint Procedures**

**Requirement to Develop Title VI Complaint Procedures and Complaint Form.**

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

Any individual may exercise his or her right to file a complaint with Greensville County Department of Public Transportation if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Greensville County Department of Public Transportation includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

Greensville County Department of Public Transportation is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Greensville County Department of Public Transportation's nondiscrimination policies and procedures, or to file a complaint, please contact Program Coordinator and/or Finance Supervisor at 1781 Greensville County Circle, Emporia, VA 23847.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities.

**A copy of Greensville County Department of Public Transportation Title VI Complaint Form is attached as APPENDIX B.**

## **Procedures for Handling and Reporting Investigations/Complaints and Lawsuits**

Should any Title VI investigations be initiated by FTA or DRPT, or any Title VI lawsuits are filed against Greenville County Department of Public Transportation the agency will follow these procedures:

### **Procedures**

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
  - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
  - b. The complaint shall be in writing and signed by the complainant(s).
  - c. The complaint should include:
    - the complainant's name, address, and contact information
    - (i.e., telephone number, email address, etc.)
    - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
    - a description of the alleged act of discrimination
    - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
    - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
    - if known, the names and/or job titles of those individuals perceived as parties in the incident
    - contact information for any witnesses
    - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
  - d. The complaint shall be submitted to the Greenville County Department of Public Transportation Title VI Manager at 1781 Greenville County Circle, Emporia, VA 23847.
  - e. Complaints received by any other employee of Greenville County Department of Public Transportation will be immediately forwarded to the Title VI Manager.
  - f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Program Coordinator and/or Finance Supervisor will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
  - a. notify DRPT (no later than 3 business days from receipt)

- b. notify the Greenville County Department of Public Transportation Program Coordinator and/or Finance Supervisor
  - c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
  - a. investigating contractor operating records, policies or procedures
  - b. reviewing routes, schedules, and fare policies
  - c. reviewing operating policies and procedures
  - d. reviewing scheduling and dispatch records
  - e. observing behavior of the individual whose actions were cited in the complaint
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and **within 60 days** of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Program Coordinator and/or Finance Supervisor, DRPT, and, if appropriate, Greenville County Department of Public Transportation's legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. A complaint may be dismissed for the following reasons:
  - a. The complainant requests the withdrawal of the complaint.
  - b. An interview cannot be scheduled with the complainant after reasonable attempts.

- c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Greenville County Department of Public Transportation. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

## **Transportation-Related Title VI Investigations, Complaints, and Lawsuits**

### **Background**

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to DRPT every three years and information shall be provided to DRPT quarterly and annually.

**A copy of Greenville County Department of Public Transportation Title VI Complaint Log is attached as APPENDIX C.**

## **Public Outreach and Involvement**

### **PUBLIC PARTICIPATION PLAN**

#### **Introduction**

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Greenville County Department of Public Transportation utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

Greenville County Department of Public Transportation established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Greenville County Department of Public Transportation will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

SEE APPENDIX D-Summary of Outreach Efforts

## **VIII. LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

### **Introduction and Legal Basis**

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Greenville County is based on FTA guidelines.

As required, Greenville County developed a written LEP Plan (below). Using American Community Survey (ACS) Census data, Greenville County has evaluated data to determine the extent of need for translation services of its vital documents and materials.

### **Assessment of Needs and Resources**

The need and resources for LEP language assistance were determined through a Four Factor Analysis as recommended by FTA Guidance.

#### **Factor 1: Assessment of the number and proportion of LEP persons likely to be Served or Encountered in the Eligible Service Population.**

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

#### **U.S. Census Data – American Community Survey (2011-2015)**

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) by Greenville Transit's service area. The agency's service area includes a total of 344 (2.07%) persons with Limited English Proficiency (those persons who indicated that they spoke English "less than very well" in the 2011-2015 ACS Census).

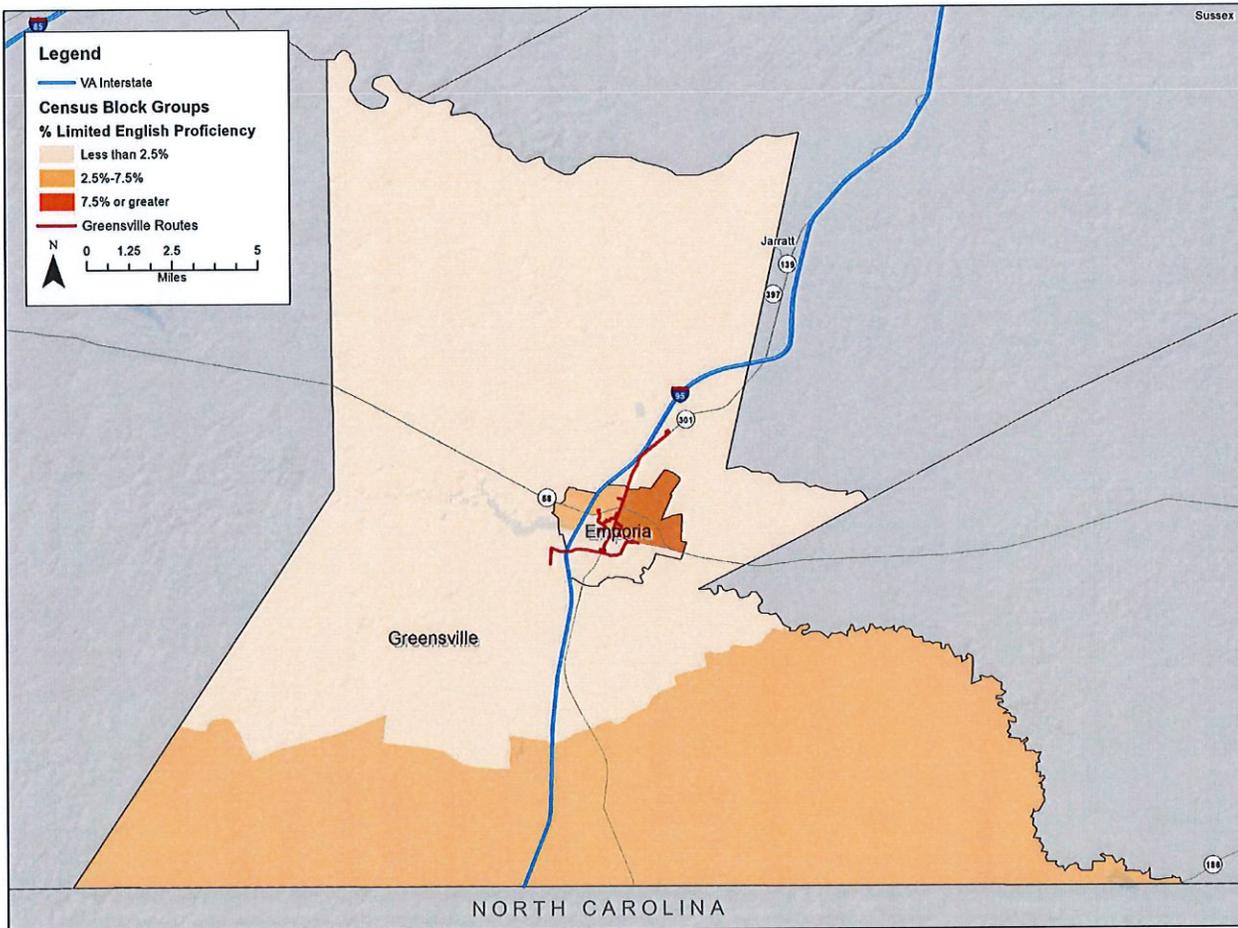
Information from the 2011-2015 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

**Table 1 – LEP by Language Spoken at Home**

Greensville Transit Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	290	1.74%	84.30%
Vietnamese	15	0.09%	4.36%
Tagalog	15	0.09%	4.36%
African languages	15	0.09%	4.36%
Arabic	9	0.05%	2.62%
<b>Total LEP Population</b>	<b>344</b>	<b>2.07%</b>	
<b>Total Service Area Population</b>	<b>16,629</b>		

Spanish or Spanish Creole (290) is the most widely spoken language among LEP individuals in the Service Area. No language group surpasses the Safe Harbor Provision. Figure 1 shows the percentage of LEP individuals in each Census Block Group. There are higher percentages of LEP persons in northeastern Emporia.

**Figure 1 - % LEP by Census Block Group**



**Factor 2: Assessment of Frequency with Which LEP Individuals Come into Contact with the Transit Services or System**

Greenville County reviewed the relevant benefits, services, and information provided by Greenville Emporia Transit (GET) and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to Greenville County’s customer service telephone line;
- Visits to the agency’s headquarters;
- Access to the agency’s website;

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. To supplement the Census, education, and labor department data, Greenville Emporia Transit conducted community outreach to the following organizations that work with LEP populations.

- Greenville/Emporia Department of Social Services;
- Southside Virginia Community College,

Through community meetings GET sought feedback from these organizations on the size of the populations it serves, the transportation of the populations, any demographic trends among this population, and effective ways to obtain input from this population.

**Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population**

Greenville County provides the following programs, activities and services:

- Demand Response-Flexible Fixed Route service in a one county, one city service area.

Based on past experience serving and communicating with LEP persons and interviews with community agencies, we learned that the following services/routes/programs are currently of particular importance to LEP persons in the community.

- Loop service within the City of Emporia VA.

**Factor 4: Assessment of the Resources Available to the Agency and Costs**

Though the Greenville/Emporia Department of Social Services can provide assistance at no charge, funds in the amount of \$500.00 are available in the operating budget. (Professional Services)

## **LEP Implementation Plan**

Through the four-factor analysis, Greenville County has determined that due to the small size of the LEP population in its service area, the following types of language assistance are most needed and feasible:

- Use of Google translate and other online translators.
- In-kind support from community organizations that assist the LEP community.
- Attempt to hire bilingual staff when hiring.

### ***Staff Access to Language Assistance Services***

Agency staff who come into contact with LEP persons can access language services by offering Census language identification flashcards, reaching out to bilingual staff if available, or reaching out to community organizations for in-kind support. All staff will be provided with a list of available language assistance services and additional information and referral resources (such as community organizations which can assist LEP persons). This list will be updated at least annually.

### ***Responding to LEP Callers***

Staff who answer calls from the public respond to LEP customers as follows:

- Reach out to bilingual staff if available
- Contact community organizations for in-kind support

When scheduling a trip with an LEP individual, Greenville County will attempt to:

- Match the customer with a bilingual driver, if possible.
- Try to receive in kind language assistance from community organizations.

### ***Responding to Written Communications from LEP Persons***

The following procedures are followed when responding to written communications from LEP persons:

- Utilize Google Translate if necessary
- Reach out to bilingual staff or community organizations for in-kind support

### ***Responding to LEP Individuals in Person***

The following procedures are followed when an LEP person visits our customer service and administrative office:

- Use Census language identification flashcard

- Check for availability of bilingual staff
- Reach out for in-kind support from community organizations, if possible.

The following procedures are followed by operators when an LEP person has a question on board a Greenville County vehicle:

- Identify language using Census language identification flashcard
- Contact bilingual staff if possible.
- Attempt to use Google Translate or other technology on devices to come to an understanding.
- Ask for assistance from fellow passengers.

### ***Staff Training***

As noted previously, all Greenville County staff are provided with a list of available language assistance services and additional information and referral resources, updated annually.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the agency's cultural sensitivity policies and practices.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons.

### ***Providing Notice to LEP Persons***

LEP persons are notified of the availability of language assistance through the following approaches:

- Title VI policy statement to be included on vital documents.
- Posting signs on our vehicles and in on customer service offices.

LEP persons will also be included in all community outreach efforts related to service and fare changes.

***Monitoring/Updating the plan***

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Greenville County will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic community meetings, internal staff meetings, and review updated Census Data to assess the adequacy and quality of the language assistance provided. This will help determine if any changes to the LEP plan are necessary.

In preparing the triennial update of this plan, Greenville County Transit will conduct an internal assessment using the Language Assistance Monitoring Checklist provided in the FTA's "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers."

Based on the feedback received from community members and agency employees, Greenville County will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore Greenville County Transit will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Greenville County Transit will strive to address the needs for additional language assistance.

## **MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES**

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

Greensville County Department of Public Transportation has a transit-related, non-elected advisory board, the membership of which the Southside Virginia Education Center Board of Directors (SVEC BOARD) selects.

The SVEC Board, in its search for the causes behind the citizens in the service area failing to take advantage of educational opportunities, found that the lack of transportation was a contributing factor. The SVEC Board created a transportation initiative as part of the process in resolving this issue. The SVEC Board is comprised of local government officials, industry representatives, members of the educational workforce and state agencies (DSS, CSB and VEC). These same members were all invited to be a part of the Greensville Emporia Public Transportation Advisory Board.

This advisory board meets to discuss policies and procedures in the operations of the GET System.

**SEE APPENDIX E – Table Minority Representation on Committees by Race**

## IX. REQUIREMENTS OF TRANSIT PROVIDERS

### Requirements and Guidelines for Fixed Route Transit Providers

The requirements apply to all providers of fixed route public transportation (also referred to as transit providers) that receive Federal financial assistance, inclusive of States, local and regional entities, and public and private entities.

Transit providers that are sub-recipients will submit the information to their primary recipient (the entity from whom they directly receive transit funds) every three years on a schedule determined by the primary recipient. The requirements are scaled based on the size of the fixed route transit provider.

Greenville County Department of Public Transportation is required to plan and deliver transportation services in an equitable manner. This means the distribution of service levels and quality is to be equitable between minority and low income populations and the overall population. Greenville County Department of Public Transportation has reviewed its services and policies to ensure that those services and benefits are provided in an equitable manner to all persons.

#### Service Standards

The agency has set standards and policies that address how services are distributed across the transit system service area to ensure that the distribution affords users equitable access to these services. The agency's demand responsive services are available to all callers on a first-come first-served basis, without regard for race, color or national origin. As shown in the attached maps as **Appendix F**, the Agency's route traverses the service area near low income neighborhoods where pedestrians frequently travel for medical services, basic needs, educational and work opportunities.

The following system-wide service standards are used to guard against service design or operations decisions from having disparate impacts. All of Greenville County Department of Public Transportation's services meet the agency's established standards; thus it is judged that services are provided equitably to all persons in the service area, regardless of race, color or national origin.

- **Vehicle load** -Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle at its maximum load point. The standard for maximum vehicle load is 18 passengers without wheelchair and 14 passengers with wheelchair; all of Greenville County Department of Public Transportation meets this standard.
- **Vehicle headway** -Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given route. A shorter headway corresponds to more frequent service. The standard for vehicle headways is 1-hour round trip; all of Greenville County Department of Public Transportation meets this standard.
- **On-time performance** -On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." The standard for

performance is within three minutes of the scheduled stop time; Greenville County Department of Public Transportation meets this standard 90% of the time.

- **Service availability** - Service availability is a general measure of the distribution of routes within a transit provider's service area or the span of service. The standard for service availability is 7:00 a.m. – 7:00 p.m., Monday-Friday, all of Greenville County Department of Public Transportation meets this standard.

### **Service and Operating Policies**

The Greenville County Department of Public Transportation service and operating policies also ensure that operational practices do not result in discrimination on the basis of race, color, or national origin.

- **Distribution and Siting of Transit Amenities** - Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Greenville County Department of Public Transportation has a policy to ensure the equitable distribution of transit amenities across the system. This policy applies to seating (i.e., benches, seats), bus shelters and canopies, (c) provision of information, Intelligent Transportation Systems (ITS), waste receptacles (including trash and recycling). Passenger amenities are sited based on availability of space for amenities, safety of the passengers, number of passengers utilizing GET services at a given stop, and requests from passengers.
- **Vehicle assignment** - Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. Greenville County Department of Public Transportation assigns vehicles with the goal of providing equitable benefits to minority and low income populations. Vehicles are assigned with regard to service type (fixed-route, demand-response, or a hybrid type) and ridership demand patterns (routes with greater numbers of passengers need vehicles with larger capacities). For each type of assignment, newer vehicles are rotated to ensure that no single route or service always has the same vehicle. The Program Coordinator reviews vehicle assignments on a monthly basis to ensure that vehicles are indeed being rotated and that no single route or service always has the old or new vehicles.

## **Monitoring Title VI Complaints**

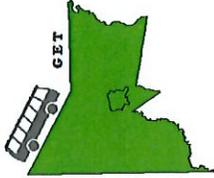
As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to DRPT.

## **Fare and Service Changes**

Greenville County Department of Public Transportation follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, Greenville County Department of Public Transportation considers the relative impacts on, and benefits to, minority and low income populations, including LEP populations. All planning efforts for changes to existing services or fares, as well as new services, have a goal of providing equitable service.

# APPENDICES



GREENSVILLE COUNTY DEPARTMENT OF PUBLIC  
TRANSPORTATION  
NOTICE TO THE PUBLIC--LIST OF LOCATIONS  
APPENDIX A

**Locations where the Title VI Notices have been posted or displayed are as follows:**

- Each bus
- County's website
- Notice Board at Greensville County Government Building
  - Brochures
- Bus shelters when constructed



GREENSVILLE COUNTY DEPARTMENT OF PUBLIC  
TRANSPORTATION  
TITLE VI COMPLAINT FORM

APPENDIX B

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
_____			
_____			
<b>Section IV</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No
<b>Section V</b>			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			

If yes, check all that apply:

Federal Agency: \_\_\_\_\_

Federal Court \_\_\_\_\_

State Court \_\_\_\_\_

State Agency \_\_\_\_\_

Local Agency \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

**Section VI**

Name of agency complaint is against:

Contact person:

Title:

Telephone number:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



GREENSVILLE COUNTY DEPARTMENT OF PUBLIC  
 TRANSPORTATION  
 INVESTIGATIONS, LAWSUITS AND COMPLAINTS FORM  
 APPENDIX C

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				



GREENSVILLE COUNTY DEPARTMENT OF PUBLIC  
TRANSPORTATION  
SUMMARY OF OUTREACH EFFORTS

APPENDIX D

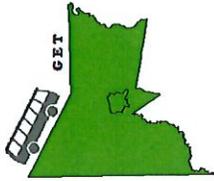
- Independent Messenger newspaper articles
- Brochures distributed and posted at the following:
  - Department of Social Services
  - Southside Virginia Education Center
  - Virginia Employment Commission
  - YMCA
  - District-19
  - Health Department
  - Southside Community Corrections
  - Greensville County Government Building
  - City of Emporia Municipal Building



GREENSVILLE COUNTY DEPARTMENT OF PUBLIC  
TRANSPORTATION  
TABLE MINORITY REPRESENTATION ON  
COMMITTEES BY RACE

APPENDIX E

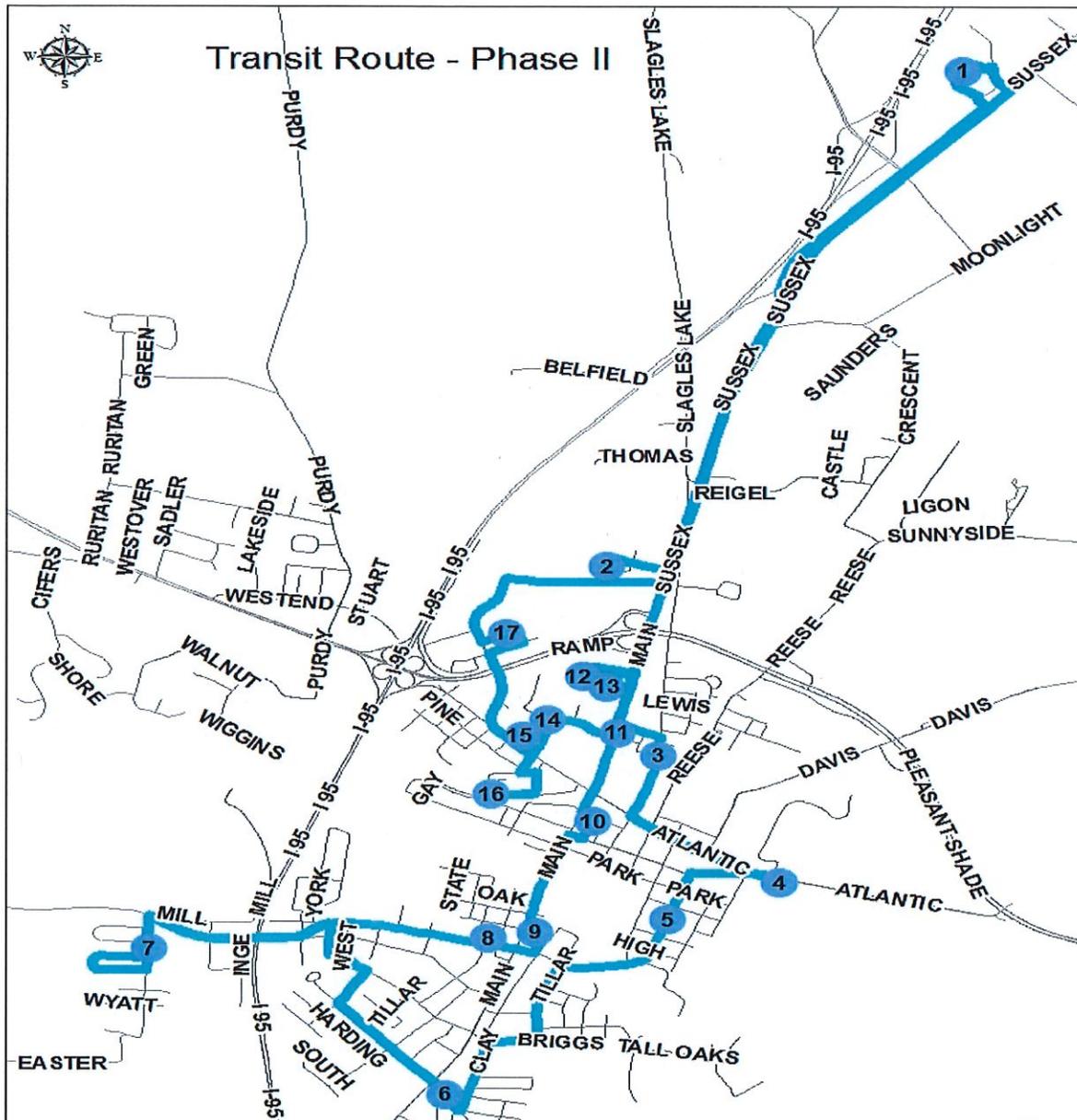
Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other <i>*Note</i>	Totals
Citizens Advisory Committee (GETAB)	6	17	0	0	0	0	0	23
% of CAC Committee								
Citizens Advisory Committee on Accessible Transportation (CACAT)								
% of CACAT Committee								



GREENSVILLE COUNTY DEPARTMENT OF PUBLIC  
TRANSPORTATION

ROUTE MAP

APPENDIX F





GREENSVILLE COUNTY DEPARTMENT OF PUBLIC  
TRANSPORTATION

TITLE VI PUBLIC NOTICE

APPENDIX G

PUBLIC NOTICE

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI 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 2000d).

Greensville County Department of Public Transportation is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Greensville County Department of Public Transportation, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

<b>Name</b>	<b>J. Reggie Owens and/or Alice H. Whitby</b>
<b>Title</b>	<b>Program Coordinator and/or Finance Supervisor</b>
<b>Agency Name</b>	<b>Greensville County Department of Public Transportation</b>
<b>Address</b>	<b>1781 Greensville County Circle</b>
<b>City, State Zip Code</b>	<b>Emporia, VA 23847</b>
<b>Telephone Number</b>	<b>(434) 348-4205</b>
<b>Email address</b>	<b>admin@greensvillecountyva.gov</b>