
Title VI Plan and Procedures
Title VI of the Civil Rights Act of 1964

FARMVILLE AREA BUS



Adopted date

January 2016

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APPENDICES

- A Title VI Notice to the Public; List of Locations
- B Title VI Complaint Form

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

- O Demographic and service profile maps and charts
- O Demographic ridership and travel patterns, collected by surveys
- O A description of the public engagement process for setting the "major service change policy," disparate impact policy, and disproportionate burden policy
- O 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) approved the results of the analysis

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 Farmville Area Bus incorporates nondiscrimination policies and practices in providing services to the public. Farmville Area Bus'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

The Town of Farmville, in conjunction with the Virginia Department of Rail and Public Transportation and Longwood University, provides a fixed-route transit service seven days a week. The Farmville Area Bus provides service utilizing two (2) in-town routes.

Regular fare for all lines, except PERT, is 25 cents; however, children under six and senior citizens (60 and over) ride free. Longwood University students ride for free by showing their student I.D. when boarding. Their fares are paid through student fees at the University.

The **Blue Line** remains within the Town limits and provides transportation to various businesses, senior citizen complexes and medical facilities. It operates Monday through Friday from 7:04a.m. until 6:15 p.m., and on Saturday from 8:04a.m. until 6:15 p.m.

The **Express Line** is a half hour shuttle from Longwood University to various business establishments throughout Town. It operates Monday through Thursday from 12:00 noon until 8:00 p.m., Friday and Saturday from 12:00 noon until 11:00 p.m., and on Sunday from 12:30 noon until 8:00p.m.

The **Campus and Campus Direct** Lines are circular shuttles geared more for Longwood University students. They assist in transporting the off-campus housed students to and from campus.

ADA Paratransit Van Service- The Farmville Area Bus is proud to also offer ADA Paratransit Van Service. The Paratransit Service provides accessible public transportation throughout the Town and the Paratransit operators will provide door-to-door assistance for handicap individuals. For more information on this service, please call our office.

The Farmville Area Bus also operates the **Prince Edward County Transit (PERT)**. **PERT** serves the Meherrin/Green Bay and Prospect/Pamplin areas on alternating weekdays. Fares for this line is \$1.00 each way.

PERT services include:

The Green Line which operates in the Prospect/Pamplin Area on Monday and Thursday of each week.

The Orange Line which operates in the Meherrin/Green Bay area on Tuesday, Wednesday and Friday of each week.

The Farmville Area Bus is located at 502 Doswell Street.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Farmville Area Bus 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 Town of Farmville Title VI Counselor 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



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 PTA/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 PTA'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, **Town of Farmville/Farmville Area Bus** 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, Farmville Area Bus 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 Farmville Area Bus Title VI Implementation Plan 2015-2018. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Farmville Area Bus's 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.

J. H. Hricko

Signature of Authorizing Official

January 14, 2016
DATE

Lisa Hricko, Title VI Equal Opportunity Counselor

Town of Farmville / Farmville Area Bus

*NOTE: **Provide here** a copy of meeting minutes, resolution, or other appropriate documentation showing that the board of directors or appropriate governing entity of official(s) responsible for policy decisions has reviewed and approved the Title VI Program.*

TOWN OF FARMVILLE
Post Office Drawer 368
Farmville, Virginia 23901

Gerald J. Spates, Town Manager
Carol Anne Seal, Town Treasurer

434.392.5686
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COUNCIL
David E. Whitus, Mayor
A. D. "Chuckie" Reid
Sally Thompson
Tommy Pairet
Donald L. Hunter
J.J. "Jamie" Davis
Greg Cole
Daniel E. Dwyer
Lisa Hricko, Clerk of Council

January 19, 2016

The following is an excerpt of the minutes of the regular Council meeting of the Farmville Town Council held on Wednesday, January 13, 2016.

REQUEST APPROVAL OF THE FARMVILLE AREA BUS TITLE VI PROGRAM

On motion by Mr. Hunter, seconded by Mrs. Thompson and with all Council members voting "aye", the motion to adopt the Farmville Area Bus Title VI Program, as presented was approved.

BACKGROUND The Farmville Area Bus receives public transportation funding from the Federal Transit Administration (FTA) and the Virginia Department of Rail and Public Transportation (DRPT). Mr. Spates stated in order to receive funding from the FTA and the DRPT, the Farmville Area Bus is required to develop policies, programs and practices that ensure federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI. The plan is to be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

CERTIFIED TRUE COPY



Lisa M. Hricko, Clerk

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The **Town of Farmville's** Title VI Counselor is 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 Counselor 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 Counselor 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 Counselor 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, Farmville Area Bus 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, Farmville Area Bus 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. Farmville Area Bus 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 Counselor 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. Farmville Area Bus 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 Counselor 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 the Title VI Counselor.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Farmville Area Bus's contract/PO will include appropriate non-discrimination clauses. The Title VI Counselor will work with the Transit Manager, 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, Farmville Area Bus 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.

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).

Farmville Area Bus 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 Farmville Area Bus, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Mrs. Lisa M. Hricko
Title VI Equal Opportunity Counselor
Town Of Farmville
116 North Main Street
Farmville, VA 23901
434-392-5686
lhricko@farmvilleva.com

NOTE: As part of Title VI requirements, sub-recipients are also required to maintain a list of locations where their Title VI Notices have been posted or displayed. This list is to be included as part of APPENDIX A- Title VI Notice to the Public: List of Locations.

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.

Sample of Narrative

Any individual may exercise his or her right to file a complaint with Farmville Area Bus 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, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Farmville Area Bus 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:

Farmville Area Bus 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 Farmville Area Bus's nondiscrimination policies and procedures, or to file a complaint, please visit the website at <http://farmvilleva.com/departments/farmville-area-bus> or contact Mrs. Lisa Hricko, 116 N. Main Street, Farmville, VA 23901, 434-392-5686.

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, and are also included within Farmville Area Bus's schedule brochure.

A copy of Farmville Area Bus's Title VI Complaint Form and all locations that it is posted are 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 **Farmville Area Bus**, 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 Counselor. 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 Town of Farmville's Title VI Counselor at **116 North Main Street, Farmville, VA 29301** or **lhricko@farmvilleva.com**.
 - e. Complaints received by any other employee of **Farmville Area Bus** will be immediately forwarded to the Title VI Counselor.
 - 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 Counselor. Under these circumstances, the complainant will be interviewed, and the **Transit Manager** will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Counselor will immediately:
 - a. notify DRPT (no later than 3 business days from receipt)
 - b. notify the **Farmville Area Bus Transit Manager**
 - c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Counselor 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 Counselor 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 Counselor 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 Counselor 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 Counselor 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 FAB Transit Manager, DRPT, and, if appropriate, Town of Farmville's legal counsel.
12. The Title VI Counselor 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 the Town of Farmville/Farmville Area Bus. 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.

List of Investigations, Lawsuits, and Complaints

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

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 Farmville Area Bus 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.

Farmville Area Bus 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.

Farmville Area Bus 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.

PUBLIC OUTREACH AND INVOLVEMENT

As an agency receiving federal financial assistance, we have made or are making the following community outreach efforts:

Public Meetings. When new service is proposed, it is taken before the Farmville Town Council to discuss the feasibility of the service. All are welcome to attend the Council Meetings. Meetings are held once a month.

Customer Complaint Process. Citizens may call the Farmville Area Bus office at 434-392-7433 to lodge a complaint or comment. All complaints/comments are written down in a complaint book and given to the Transit Manager to research the complaint and respond back to the citizen.

Public Notice. We submit to the Virginia Department of Rail and Public Transportation annually with an application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice in our local newspaper, ***The Farmville Herald***, which includes a two week public comment period. We also post public notices at major passenger/public facilities and in all vehicles.

Website. The Town of Farmville maintains a website with a direct link to Farmville Area Bus: www.farmvilleva.com

Customer Comment. Farmville Area Bus management is always open to input via phone or email- fab@moonstar.com.

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

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 Act 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 Farmville Area Bus is based on FTA guidelines.

As required, Farmville Area Bus developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, Farmville Area Bus has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

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 (2006-2010)

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by Farmville Area Bus's service area. The agency's service

area includes a total of 85 persons with Limited English Proficiency (those persons who indicated that they spoke English "not well," and "not at all" in the 2006-2010 ACS Census).

Information from the 2006-2010 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. The data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

.38% of the total population of Prince Edward County "does not speak English well".

It is noted that there is a very low number of LEP persons in the service area - no language is spoken by over 5% or a total of 1,000 persons in the LEP population.

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

Farmville Area Bus reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through *one or more of* the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to Farmville Area Bus's customer service telephone line;
- Visits to the agency's headquarters;
- Access to the agency's website;
- Attendance at community meetings or public hearings hosted by the Town of Farmville;
- Contact with the agency's ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers).

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>)]

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

(Farmville Area Bus service area does not rise to the percentage needed to participate in these services. If the percentage should rise above the threshold, FAB will complete these steps.)

The following are the most critical services provided by Farmville Area Bus for all customers, including LEP persons.

- Safety and security awareness instructions
- Emergency evacuation procedures
- Public transit services, including reduced fare application process
- ADA paratransit services (if your agency operates fixed-route), including eligibility certification process
- Other paratransit services
- Services targeted at low income persons

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

(Based on the analysis of demographic data, the Farmville Area Bus service area does not rise to the percentage needed to complete this step. Should the percentage rise above the threshold, FAB will complete this step.)

Feasible and Appropriate Language Assistance Measures

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time:

- *Longwood University has translators (professors) that are willing to translate should FAB encounter a LEP customer.*
- *FAB has Language Identification flashcards at the front desk, as well.*

LEP Implementation Plan

Through the four-factor analysis, Farmville Area Bus has determined that the following types of language assistance are most needed and feasible:

Staff Access to Language Assistance Services

Agency staff that come into contact with LEP persons can access language services by using Voiance Language Services, LLC, as well as Language Identification Flashcards. 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: FAB can use Voiance Language Services. The Town of Farmville has a contract with them.

Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications from LEP persons: Longwood University Translators, although FAB has never encountered this.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our customer service and administrative office: Language Identification Flashcards and Longwood University Translators, although FAB has never encountered this.

The following procedures are followed by operators when an LEP person has a question on board a Farmville Area Bus vehicle: call to FAB office or Town of Farmville Police Dispatch office. FAB drivers have never come into contact with an LEP customer.

Staff Training

As noted previously, all **Farmville Area Bus** 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:

Based on the demographic data, Farmville Area Bus staff, both office personnel as well as drivers, have never come into contact with a LEP person, therefore, this plan serves as the only notice provided to LEP persons.

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, Farmville Area Bus will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic *review of updated Census data* of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, Farmville Area Bus 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, Farmville Area Bus 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 Farmville Area Bus will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Farmville Area Bus 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."

Farmville Area Bus does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

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.

REQUIRED: Service Standards and Policies

- **Service Standards**
 - o Vehicle load, Vehicle headway, On-time performance, Service availability
- **Service Policies**
 - o Transit amenities, Vehicle assignment

Farmville Area Bus 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. Farmville Area Bus 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. As shown in the following maps, the agency's routes serve all areas in town equally. 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.

- 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 38:19, all of Farmville Area Bus's services meet this standards
- 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. FAB does not have vehicle headway due to the small area of service.
- 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 on-time performance is 5 to 10 minutes after scheduled stop time, all of Farmville Area Bus's services meet this standards
- 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 equally available in all populated geographic areas of Farmville. All of Farmville Area Bus's services meet this standard.

Service and Operating Policies

The Farmville Area Bus's 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. Farmville Area Bus 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 population and lay of the land, as well as customer requests.
- Vehicle assignment - Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the system. Farmville Area Bus 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 Transit Manager 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. All FAB vehicles are essentially the same in comfort, age, etc. They all get rotated through all the routes equally.

Monitoring Title VI Complaints

As part of the complaint handling procedure, the Title VI Counselor 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

Farmville Area Bus follows its adopted written policy for the public comment process for major service reductions and fare increases. With each proposed service or fare change, **Farmville Area Bus** 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.



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Title VI

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 grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under and program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Town of Farmville/Farmville Area Bus is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of 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 the Town of Farmville, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact:

Mrs. Lisa Hricko
Title VI Counselor
Town of Farmville/ Farmville Area Bus
116 North Main Street
Farmville, Virginia 23901
(434) 392-56 6

For more information, visit our website at:

<http://farmvilleva.com/departments/farmville-area-bus>

APPENDIX A (Part 2)

Locations of Posted Title VI:

- 1) All FAB Schedules
- 2) FAB Website
- 3) Drivers' Room at FAB Station
- 4) FAB Bulletin Board in Bus Bay
- 5) All FAB Buses

APPENDIX B - Title VI Complaint Form

Farmville Area Bus

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
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
Section III:				
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.				

Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?				

