

Standard DOT Title VI Assurances

Greene County Transportation Department, (hereinafter referred to as the Sponsor) hereby agrees that as a condition to receiving Federal financial assistance from the Department of Transportation (DOT), it will comply with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.) and all requirements imposed by 49 CFR Part 21, - Nondiscrimination in Federally Assisted Programs of the Department of Transportation -- Effectuation of the Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the "Regulations") to the end 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 otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this agreement. Without limiting the above general assurance, the sponsor agrees concerning this grant that:

1. Each "program" and "facility" (as defined in Sections 21.23(e) and 21.23 (b)) will be conducted or operated in compliance with all requirements of the Regulations.
2. It will insert the clauses of Attachment 1 of this assurance in every contract subject to the Act and the Regulations.
3. Where Federal financial assistance is received to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.
4. Where Federal financial assistance is in the form or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over, or under such property.
5. It will include the appropriate clauses set forth in Attachment 2 of the assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the sponsor with other parties:
 - (a) for the subsequent transfer or real property acquired or improved with Federal financial assistance under this Project; and
 - (b) for the construction or use of or access to space on, over, or under real property acquired or improved with Federal financial assistance under this Project.
6. This assurance obligates the Sponsor for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest therein or structures or improvements thereon, in which case the assurance obligates the sponsor or any transferee for the longer of the following periods:

- (a) the period during which the property is used for a purpose for which Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits, or
 - (b) the period during which the sponsor retains ownership or possession of the property.
7. It will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he delegates specific authority to give reasonable guarantee that it, other sponsors, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants or Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this assurance.
8. It agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and the assurances.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining Federal financial assistance for this Project and is binding on its contractors, the sponsor, subcontractors, transferees, successors in interest and other participants in the Project. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the Sponsor.

Dated: 2/20/15

Greene County Transportation Department

BY: Misty Chase
Misty Chase, Director

Title VI Plan

Transit System

Adopted on: 1-20-15

Greene County Board of

Adopted by: Commissioners

Revised on: _____

This policy is hereby adopted and signed by:

Greene County Transportation System

Executive Name/Title: Misty Chase / Director

Executive Signature: Misty Chase

Policy Statement

The Greene County Transportation System as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the North Carolina Department of Transportation (NCDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Title VI Plan Elements

The Greene County Transportation System's Title VI plan includes the following elements:

1. Evidence of Policy Approval
2. Notice to the Public
3. Complaint Procedure
4. Complaint Form
5. List of transit related Title VI Investigations, Complaints and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

Title VI Complaint Procedure

The Greene County Transportation System's Title VI Complaint Procedure is made available in the following locations: *(check all that apply)*

- Agency website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the central office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- Other, _____

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Greene County Transportation System may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

The Greene County Transportation System investigates complaints received no more than 180 days after the alleged incident. The Greene County Transportation System will process complaints that are complete.

Once the complaint is received, the Greene County Transportation System will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Greene County Transportation System has 60 days to investigate the complaint. If more information is needed to resolve the case, the city may contact the complainant.

The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, the city can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so, but no later than 180 days from the alleged date of occurrence.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Have you previously filed a Title VI complaint with this agency?	Yes	No
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Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes 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

Please submit this form in person at the address below, or mail this form to:

Transit System Title VI Coordinator, Misty Chase 104 Hines Street, Snow Hill, NC 28580

Strategies and Desired Outcomes

To promote inclusive public participation, the Greene County Transportation System will use its resources available to employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Expand traditional outreach methods. Think outside the box: go to hair salons, barbershops, street fairs, faith-based institutions, libraries, etc.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide childcare and food during meetings, if possible.
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

Documented Public Outreach

The direct public outreach and involvement activities conducted by the Greene County Transportation System are summarized in the table below. Efforts include *meetings, surveys, focus groups, etc.*

Information pertinent to each event and/or activity will be provided to NCDOT upon request. Examples include copies of: meeting announcements, agendas, posters, attendee list, etc.

Event Date	Transit System Staffer(s)	Event	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Focus Group, Survey, etc.)	Notes (Meeting size and format, location, Number of Attendees, etc.)

2. Analyzed the LEP demographic data for the Greene County Transportation System's program and/or service area by calculating the *Safe Harbor Threshold* for two to three of the largest language groups identified other than English.
 - a. The *Safe Harbor Threshold* is calculated by dividing the population estimate for a language group that "Speaks English less than very well" by the total population of the county.
 - i. The *LEP Safe Harbor Threshold* provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less) the Greene County Transportation System must provide translation of vital documents in written format for the non-English users.
 - ii. Examples of written translation of vital documents include the Title VI policy statement and/or Notice to the Public (Appendix 2), Title VI Complaint Procedure (Appendix 3), Title VI Complaint Form (Appendix 4), and ADA paratransit eligibility forms.
3. Explained the results of the analysis of the county LEP data in the demographic section of the *Four Factor Analysis*.

- ✓ **Factor 2: Frequency:** How often does your staff (and/or contractor/lessee) come into contact with LEP persons?

Overview

LEP persons are persons identified as speaking English less than very well, not well or not at all. Just because a person speaks a language other than English doesn't mean they don't speak English or are identified as LEP. The summary below discusses the frequency with which Greene County Transportation System staff, and/or its contractor/lessee come into contact with LEP persons. It also provides information on the how staff is instructed to meet the needs of LEP persons.

- Factor 3: Importance:** How does the program, service or activity affect people's lives?

Overview

The summary below discusses how the Greene County Transportation System's program and services impact the lives of person's within the community. The Transit System will specify the community organizations that serve LEP persons, if available.

- ✓ **Factor 4: Resources and Costs:** What funding and other resources are available for LEP outreach?

Overview

Factor 2 – Frequency

The Greene County Transportation System will be trained on what to do when they encounter a person that speaks English less than well. The Greene County Transportation System will track the number of encounters and consider making adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of the Greene County Transportation System's programs and services.

The Greene County Transportation System provides rides to XX persons per year.

Our system has an open door policy and will provide rides to any person who requests a ride. If an individual has speech limitations, the dispatcher or driver will work with the Transit Manager and the Greene County Transportation System, if needed, to ensure the individual receives access to the transportation service.

Factor 3 – Importance

The Greene County Transportation System understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education or access to employment. A transportation system is a key link to connecting LEP persons to these essential services.

The Greene County Transportation System has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities, stations and vehicles and providing information to the public on security awareness or emergency preparedness.

The Greene County Transportation System's assessment of what programs, activities and services that are most critical included contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the modes or the types of services that are provided to the LEP populations.

Factor 4 – Resources and Costs

Greene County Transportation System does not have a separate budget for LEP outreach. Our system works with the local DSS to reach LEP populations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

Example

The Greene County Transportation System does not have a bilingual speaking person on staff. DSS has a language assistance person to work with the Spanish(LEP) population of Greene County

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

Example

The Greene County Transportation System does the following to inform LEP persons of the availability of language assistance services: publishing timetables and route maps in languages other than English,

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Anti-Discrimination Notice

It is unlawful for the Greene County Transportation System to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, national origin, disability or veteran status.

As a council under the jurisdiction of the Greene County Transportation System, we invite council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.

Race/Ethnicity

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

___ *Asian or Pacific Islander*: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

___ *Black and/or African American* (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

___ *Hispanic*: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

___ *American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

___ *Caucasian* (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

SATURDAY				SUNDAY			
	Peak	Evening	Night		Peak	Evening	Night
Regional Trunk	15	30	30	Regional Trunk	30	60	--
Urban Radial	30	60	--	Urban Radial	30	60	--
Cross-Town	15	30	--	Cross-Town	30	--	--
Secondary Radial	60	60	--	Secondary Radial	--	--	--
Feeder	60	60	--	Feeder	--	--	--
Peak Express	--	--	--	Peak Express	--	--	--
Employer Feeder	--	--	--	Employer Feeder	--	--	--

*Day 7 am-6pm; Evening 6-9:30 pm; Night 9:30 pm-Midnight
 "--" means no service is provided during that time period

On-Time Performance Standards

Sample 1

Ninety-five (95) percent of the Transit System's transit vehicles will complete their established runs no more than five minutes early or late in comparison to the established schedule/published timetables.

Sample 2

A vehicle is considered on time if it departs a scheduled time point no more than one minute early and not more than five minutes late. The Transit System's on-time performance objective is 90% or greater. The Transit System continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability Standards

1. Expressed in writing

The Transit System will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service or within a ½ mile walk of rail service.

and/or

Local bus stops will not be more than three blocks apart. Express bus stops will be one-half to three-quarters of a mile apart.

MPO Demographic Data, Analysis and Procedures

(For MPOS)

MPO:		
Contact Person:	Signature:	Date:

In addition to the required Title VI items 1-8 (and items 10 and 11 if the MPO is a provider of fixed route public transportation), the following additional elements are included and/or attached:

- a. A demographic profile of the metropolitan area that includes identification of the locations of minority populations in aggregate
- b. A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process
- c. Demographic maps that overlay the percent minority and non-minority populations as identified by Census or ACS data, at Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including Federal funds managed by the MPO.
- d. Analysis of the impacts identified in (c) that identifies any disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and if there are alternatives that could be employed that would have a less discriminatory impact.

If the MPO is a direct recipient, the MPO will be required to submit additional information to FTA per Chapter VI-1 of FTA Circular 4702.1B (October 1, 2012).

Note

All MPOs are required to self-certify compliance with all applicable federal requirements. Planning certification reviews conducted jointly by FTA and FHWA of the metropolitan transportation planning processes of transportation management areas include a review of Title VI compliance.