

City of Alexandria  
Louisiana

Atrans



Title VI Program

As required by the  
Federal Transit Administration  
2018

P.O. BOX 71  
ALEXANDRIA, LA  
71309-0071  
318-441-6087  
318-441-6092 FAX  
[WWW.CITYOFALEXANDRIALA.COM](http://WWW.CITYOFALEXANDRIALA.COM)

**Title VI Plan — Program Guidelines**

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## **INTRODUCTION**

On April 13, 2007, the Federal Transit Administration (FTA) issued circular 4702.1B, "Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients." This circular provides recipients and sub-recipients of FTA financial assistance with guidance and instructions necessary to carry out the U.S. Department of Transportation's (USDOT) Title VI regulations (49 CFR part 21).

The City of Alexandria, LA (ATRANS) provides the people of the cities of Alexandria and Pineville with a safe, efficient, environmentally sound, comprehensive, and cost-effective transportation system. ATRANS ensures that the quality and level of transportation service is without regard to race, color, or national origin and that there is not a disparate impact on groups protected by Title VI of the Civil Rights Act of 1964 and related statutes and regulations.

ATRANS is committed to providing safe, reliable, courteous, accessible and user-friendly services to its customers. To ensure equality and fairness, ATRANS, is committed to making reasonable modifications to its policies, practices and procedures to avoid discrimination and ensure programs and services are accessible to individuals with disabilities. All citizens can request modifications by calling (318) 441-6087 or emailing Susan Broussard at [susan.broussard@cityofalex.com](mailto:susan.broussard@cityofalex.com).

ATRANS provides transit service via eight fixed routes within the jurisdictional boundaries of Alexandria/Pineville, LA. ATRANS also has a complimentary paratransit service (two vans per day) for the ADA service. ATRANS hours of operation are Monday – Saturday, 6:10 AM – 10:00 PM. The ATRANS is a small-urbanized system with approximately 62,000 residents.

## **TITLE VI ASSURANCE**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. The FY2015 Certifications and Assurances for ATRANS were pinned into TEAM.

## **TITLE VI PROGRAM**

Title VI of the Civil Rights Act of 1964, is the overarching civil rights law that prohibits discrimination based on race, color, or national origin, in any program, service or activity that receives federal assistance. Specifically, Title VI assures 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 benefit of, or be otherwise subjected to discrimination under any program or activity receiving federal assistance." Related statutes, regulations and executive orders have broadened Title VI. Section 324 of the Federal-Aid Highway Act prohibits discrimination based on sex, which is the enabling legislation of the Federal Highway Administration (FHWA). The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 prohibit unfair and inequitable treatment of persons receiving federal financial assistance. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of federal-aid recipients and contractors whether those programs and activities regardless of the type of funding.

As a recipient of federal financial assistance, ATRANS must provide access to individuals with limited ability to speak, write, or understand the English language. The department must not restrict an individual in any way from the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under its programs or projects. Therefore, the primary goals and objectives of ATRANS Title VI Program are:

1. To assign roles, responsibilities, and procedures for ensuring compliance with Title VI of the Civil Rights Act of 1964 and related regulations and directives;
2. To ensure that people affected by ATRANS programs and projects receive the services, benefits, and opportunities to which they are entitled without regard to race, color, national origin, age, sex, or disability;
3. To prevent discrimination in ATRANS programs and activities, whether those programs and activities are federally funded or not;
4. To establish procedures for identifying impacts in any program, service, or activity that may create an illegal adverse impact on any person because of race, color, national origin,;
5. To establish procedures to annually review Title VI compliance for all areas of the department;
6. To set forth procedures for filing and processing complaints by persons who believe that an act of discrimination under Title VI in an ATRANS service, program or activity exists.

ATRANS mission is *"to provide the highest quality integrated transportation services for economic benefit and improved quality of life."* As a recipient of federal transportation funds, ATRANS must comply with federal and state laws, and related statutes, to ensure equal access and opportunity to all persons, with respect to transportation services, facilities, activities, and programs, without regard to race, color, national origin. Every effort will be made to prevent discrimination in any program or activity, whether those programs and activities are federally funded or not, as guaranteed by the Civil Rights Restoration Act of 1987.

ATRANS also shall ensure that sub-recipients adhere to state and federal law and include in all written agreements or contracts, assurances that the sub-recipient must comply with Title VI and other related statutes. ATRANS as a recipient, who distributes federal transportation funds, shall monitor sub-recipients for voluntary compliance with Title VI.

## **SUBRECIPIENTS**

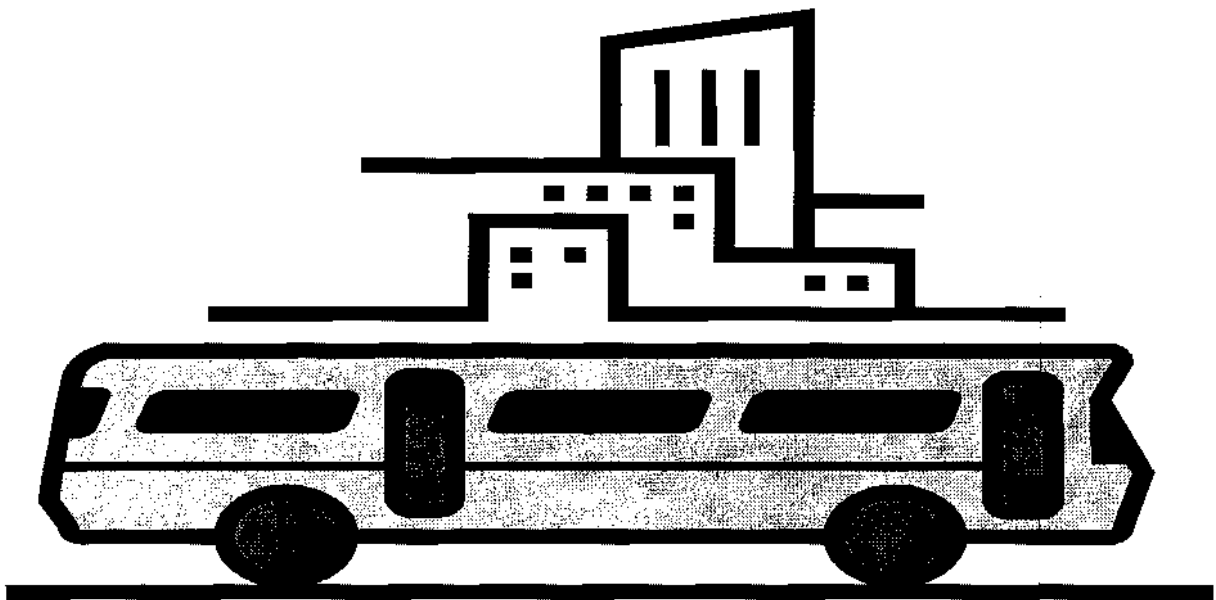
ATRANS does not pass on any FTA funds to any sub recipients

## **RESPONSIBILITIES**

Ms. Susan Broussard is responsible for ensuring that all internal program areas and external recipients of federal funds comply with Title VI and related statutes, including executive orders.

### **Notification to Beneficiaries of Protection under Title VI**

The City of Alexandria, LA recognized the importance of informing the public of its Title VI rights and providing and distributing general information to the public in a manner and language citizens can disseminate. The City of Alexandria, LA will post the following statement on each bus, at the downtown terminal, at various public city owned buildings and on the website to notify the public of their rights under Title VI. ATRANS fixed-route fleet is equipped with prominently placed signage informing passengers that ATRANS will not discriminate based on race, color or national origin. The document on the following page is the official notification posted to notify individuals of their Title VI rights.



### KNOW YOUR RIGHTS UNDER TITLE VI

The City of Alexandria, LA (ATRANS) operates its programs and services without regard to of race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person believing that an unjust or any unlawful discriminatory practice under Title VI may file a complaint with the City of Alexandria, LA.

For more information on the City of Alexandria, LA civil rights program, and the procedures to file a complaint, contact 318-441-6087 (TTY 318-441-6093), email [susan.broussard@cityofalex.com](mailto:susan.broussard@cityofalex.com), or visit our administrative office at 2021 Industrial Pak Road, Alexandria, LA 71303. For more information, visit [www.cityofalexandrialala.com](http://www.cityofalexandrialala.com).

Individuals who believe that an unjust of the benefits of, excluded from participation in, or subject to discrimination on the ground of race, color, or national origin can file an administrative complaint with City of Alexandria, LA under Title VI of the Civil Right Act of 1964, and send to the above address. If desired, individuals may file a complaint by completing the attached Title VI complaint form or a copy of the form available on-line at [www: cityofalexandrialala.com](http://www.cityofalexandrialala.com). Complaints would be signed and include contact information. A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention, Title VI Program, Coordinator, East Building 5<sup>th</sup> Floor, and TCR 1200 New Jersey Ave., SE, Washington DC 20590.



Title VI Complaint Form  
City of Alexandria, LA ATRANS

ATRANS is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please call (318) 441-6087. The completed form must be returned to ATRANS, City of Alexandria, LA, 2021 Industrial Park Road, Alexandria, LA 71303.

Name:	Telephone Number:
Street Address:	Alt Phone:
	City, State & Zip Code:
Person(s) discriminated against (if someone other than complainant):	
Name(s):	
Street Address, City, State & Zip Code:	

Which of the following best describes the reason for the alleged discrimination? (Circle one)

- ☐ Race
- ☐ Color
- ☐ National Origin (Limited English Proficiency)

Date of Incident:

Please describe the alleged discrimination incident. Provide the names and title of all employees involved if available. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

Title VI Complaint Form  
City of Alexandria, LA ATRANS

Please describe the alleged discrimination incident (continued)

Have you filed a complaint with any other federal, state or local agencies? (Circle one) Yes / No  
☐ ☐



If so, list agency / agencies and contact information below:

<u>Agency:</u>	<u>Contact Name:</u>
Street Address, City, State & Zip Code:	Phone:

<u>Agency:</u>	<u>Contact Name:</u>
Street Address, City, State & Zip Code:	Phone:

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainants Signature:	Date:
-------------------------	-------

Print or Type Name of Complainant

Date Received:

Received By:

## **Public Participation Plan**

### **PURPOSE**

The purpose of this Public Participation Plan, (PPP), is to establish procedures that allow for, encourage, and monitor participation of all citizens in the ATRANS system service area, including but not limited to low income and minority individuals, and those with limited English proficiency.

While traditional means of soliciting public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate.

This document will lay out procedures to provide opportunities for all area citizens to participate in the development of plans, including short-range plans, (roughly 5 years) which analyzes all aspects of transit operations. Where appropriate, recommendations are to improve these aspects of transit operations. Upon initiating a plan, notice is in the local newspaper, noting the existence of this public participation plan and on all buses and at the downtown transfer terminal.

Public Hearings scheduled by ATRANS will consider matters listed below.

**FARES and RATES** shall include any increase in charges and fees assessed for use of ATRANS transit services including fares, paratransit services or amendments to eligibility criteria for fare categories.

### **MAJOR ADJUSTMENTS OF TRANSIT SERVICE include:**

Any aggregate change of 25% or more of transit vehicle

Any aggregate change of 25% or more of transit service hours

The implementation of an emergency service change can occur without a public hearing with the approval of the Director of Public Works.

Emergency service changes include changes to route or service frequencies that are necessary due to a disaster, which impairs public health or safety; changes in access to public streets, street closures, or the ability of ATRANS equipment to travel on public streets.

### **PROCEDURES**

Public hearings:

- (a) Announcement of the purpose of the hearing.
- (b) Sign in
- (c) An introduction of the subject matter being considered at the Public hearing.
- (d) Receipt of public comments.
- (e) Closing the public.

**WRITTEN and EMAIL COMMENTS:**

In addition to oral comments, A T R A N S accepts written and email comments prior to the close of the public hearing.

**RECORD OF HEARING:**

The minutes of the public hearing will be maintained as a record of the meeting and distributed for consideration.

ATRANS enforces efforts to conduct assessments to monitor the level and quality of service and related transit benefits. ATRANS will periodically conduct assessments to determine whether the transit service provides the minority communities and minority users with the objectives of FTA's Title VI Program. ATRANS, with respect to the location of bus shelters, the standards are:

- to determine the frequency of service at the designated stop
- to determine the number of boarding's at a designated stop, if the volume is high then a bus shelter will be suggested to the vendor
- to determine the percentage of elderly and disabled persons using the route, if the volume is high, then a bus shelter will be suggested to the vendor

**Goals and Objectives for the Public Participation Plan****Goal:**

The goal of the PPP is to offer real opportunities for the engagement of all citizens of the ATRANS service area to participate in the development transit plans.

**Objectives:**

To determine what non-English languages and other cultural barriers exist to public participation within the Alexandria area.

To provide a general notification of meetings for public input, in a manner that is understandable to all populations in the area.

To hold meetings in locations which are accessible and reasonably welcoming to all area residents, including, but not limited to, low-income and minority members of the public.

To provide avenues for two-way flow of information and input from populations, which are not likely to attend meetings.

To provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program.

To use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps, and the Internet.

#### Identification of Stakeholders

Stakeholders are those who are directly, or indirectly affect a plan, or the recommendations of that plan. Those who may be adversely affected, or denied benefit of a plans recommendation(s), are of particular interest in the identification of specific stakeholders.

Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses.

**General Citizens:** There are 62,900 residents in the urbanized area. Forty-five (45) percent of the population of the urbanized area consider themselves to be of solely of a white race with 91 percent of the households having someone over the age of 14 who speaks English.

Some of the techniques used to engage the general population are public notices of meetings in the local newspaper and open house format public information meetings. While these techniques will continue, staff will make a greater effort to engage the public, possibly with techniques such as, nominal group exercises, surveys, use of local news media, etc.

**Minorities:** Minority populations make up 48.6 percent of the population. The black population makes up the largest minority, with nearly 44 percent of the total population of the urbanized area. While Hispanics form 2.2 percent.

Engaging minority, and low-English proficiency populations can be challenging. Language and cultural differences may not be compatible with the more traditional means of engaging the public in the planning process. ATRANS will make reasonable efforts to engage minority populations using techniques, such as including notations *in public* notices in appropriate non-English languages. Focus groups gain input from a particular defined portion of the community. In addition, advocacy groups can be a good resource for contacts and dissemination of information to minority and low-English proficiency populations. Such advocacy groups or agencies can have insight into the needs of the under-represented populations, as well as providing valuable contacts or arenas for input.

Minority representation is present on Decision-making bodies:  
ATRANS has an ADA Advisory Committee

**Low-income:** Low-income households, those with income below the local poverty level, account for over 22.1 percent of all households in the urbanized area, based on 2013 incomes. The low-income population of the Alexandria urbanized area has every reasonable opportunity to provide input on transportation plans and programs, to avoid disproportionate harm, or lack of benefit, of transportation programs and projects.

While low-income individuals may have access to all of the traditional means of public involvement, discussed under "general public", they may be less likely to become involved, or offer input. Some methods of gaining input either directly or indirectly from this portion of the population include focus groups, informal interviews, and agency/advocacy group contacts.

**Public Agencies:** Public agencies can provide valuable input to the planning process, in addition to assisting in gaining participation from traditionally under-represented populations. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to minorities, low-income, and limited English proficiency households. These agencies have great insight into the transportation needs of their clients and are useful partners in overcoming difficult barriers not understood by professionals dealing more distinctly with the provision of transportation services.

**Private Organizations and Businesses:** Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employers. For that reason, representation of private business interests welcome the planning process.

ATRANS has been working with five local agencies for identifying clients that we may not be able to reach. They assist ATRANS with some outreach activities and they assist with providing information about ATRANS to their clients. ATRANS works with CLASS (Central LA Social Services), the Hope House (battered women shelter), VAMC (Veterans Administration Medical Center), Rapides Parish Drug Court, and Pathway Services (drug and alcohol rehab).

ATRANS ADA Advisory Committee consists of six persons, three are Caucasian, and three are African-American. The committee's mission is to contribute to the continuity of ADA rules and regulations. Board members represent minorities, low income, seniors, youth, the disabled communities; as well as the public.

## **Limited English Proficiency**

### **Policy**

**The City of Alexandria, LA - ATRANS** will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of ATRANS is to ensure meaningful communication with LEP individuals. The policy also provides for communication of information contained in all transit plans, schedules, policies, changes to service, changes to fare, public notices, and any other documents made available to the public. All interpreters, translators and other aids needed to comply with this policy are without cost to the person.

ATRANS provides language assistance by using bilingual staff of the City of Alexandria. Notice of this policy is available to all staff.

**The City of Alexandria, LA - ATRANS** will conduct a regular review of the language access needs of our service area, as well as update and monitor the implementation of this policy and these procedures, as necessary and at a minimum every three years.

### **Procedures**

#### **IDENTIFYING LEP PERSONS AND THEIR LANGUAGE**

**The City of Alexandria, LA - ATRANS** will promptly identify the language and communication needs of the LEP person. If necessary, staff will use "I Speak" cards or posters to determine the language. In addition, when records are kept of past interactions with individuals, the language used to communicate with the LEP person will be included as part of the record.

#### **OBTAINING A QUALIFIED INTERPRETER**

**The City of Alexandria, LA - ATRANS** is responsible for the following:

- (a) Maintaining an accurate and current list of bilingual staff
- (b) Contacting the bilingual staff member to interpret
- (c) Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.

Pineville High School /has agreed to provide qualified interpreter services. The local high school has Mr. Fritz Winke available for Spanish interpretation at 318-442-8990 and is availability during school hours and on-call if needed after school hours.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person are available only after ATRANS has made an offer of an interpreter. Such an offer and the response will require documentation in the person's file. If the family member or friend is not competent or appropriate for any of these reasons, ATRANS provides competent interpreter services to the LEP person.

Children and other clients/patients/residents will not interpret, in order to ensure confidentiality of information and accurate communication.

#### **PROVIDING WRITTEN TRANSLATIONS**

- (a) Upon request for the translation of documents – Original documents submitted for translation will be in final, approved form with updated and accurate information.
- (b) Facilities will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.

#### **PROVIDING NOTICE TO LEP PERSONS**

The City of Alexandria, LA - ATRANS will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum, notices and signs are at the downtown transfer terminal and the administrative offices of ATRANS. Notification is through one or more of the following: outreach documents, community-based organizations including but not limited to Central LA Social Services, the VAMC, Rapides Parish Drug Court, and Hope House.

#### **MONITORING LANGUAGE NEEDS AND IMPLEMENTATION**

On an ongoing basis, ATRANS will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, ATRANS will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from individuals and community organizations.

#### Four-Factor Analysis

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee/recipient.

The number of LEP persons in the service area who may be served or are likely to encounter an ATRANS activity or service was 62,900 determined by ATRANS staff from the 2013 estimated Census of Population and Housing from the U.S. Census Bureau. The staff reviewed the census report and determined that less than 5% or 3,091 people in the urbanized area of Alexandria/Pineville area are LEP. The most common second language is Spanish with 2% of the LEP population or 984 people speaking it as a language and speaking English less than very well.

Total Population	Alexandria, LA	Pineville, LA	TOTALS	% of Total
Population 5 years +	44,318	13,782	58,100	
English	42,166	12,843	55,009	94.70%
Language other than English	2,152	939	3,091	5.30%
Speaks English < Very Well	761	332	1093	
Spanish	794	190	984	1.70%
Speaks English < Very Well	256	126	382	
Indo-European	574	201	775	1.30%
Speaks English < Very Well	92	58	150	
Asian/Pacific Islander	532	273	805	
Speaks English < Very Well	339	137	476	1.30%
Other Languages	252	275	527	1%
Speaks English Less	74	11	85	

#### Census 2013 Estimates

ATrans does not have to have any written translations because 5% or less of the eligible population does not warrant the translation as per the Safe Harbor provision.



2. The frequency with which LEP individuals come in contact with the program;

The frequency with which LEP persons come in contact with ATRANS programs, activities or services was assessed by the staff with information gained from the staff and transit operators who do have, or could have, contact with LEP persons. This includes documenting telephone inquiries and surveying transit operators for requests for interpreters and translated documents. ATRANS has access to an interpreter who is available during our business hours. ATRANS has currently zero encounters or requests regarding LEP documentation.

ATrans personnel (at all department levels) can identify an LEP person who needs language assistance by:

- Supervisors will examine records for past requests, either at meetings or over the telephone, to determine the need at future events or meetings.
  - Transit and Van operators as they greet passengers or participants as they arrive to ATRANS events by informing participants of the services available and by engaging in conversation. By engaging in conversation, the operators can determine each person's ability to speak and understand English.
  - Transit Manager and Supervisors will work with community based organizations and other persons to inform LEP individuals of services and the availability of language assistance.
  - Transit Manager and Supervisors will provide presentations and/or notices at schools and community based organizations in an effort to educate the LEP population of the available assistance.
  - Transit and Van operators and supervisors meet quarterly to discuss their experience concerning any contacts with LEP persons during that period.
3. The nature and importance of the program, activity or services provided by the program to people's lives;

The nature and importance of programs, activities or services provided by ATRANS to the LEP population proved that the largest geographic concentration of LEP individuals in the ATRANS service area is Spanish. Services provided by ATRANS that are most likely to encounter LEP individuals are the fixed route system, which serves the public, and the demand-response system, which serves primarily senior and disabled persons. Personnel throughout the department know their responsibilities about LEP.

4. The resources available to the grantee/recipient and costs.

The resources available to ATRANS and the overall costs to provide LEP assistance was assessed and its available resources that could be used for providing LEP assistance, including using a Spanish speaking city employee would not result in any added costs to the system. ATRANS will have available for use "I speak" cards.

"I speak I cannot communicate well in English. Please provide me with qualified interpreter."

By law, the institutions that receive federal funds must provide the services of a qualified interpreter to patients/clients who are not fluent in English. This law provides all people with equal access to public services. The interpreter's services is free to the patient/client. We recommend that you note this person's spoken language in his/her file.

"Yo hablo espanol. No puedo comunicarme bien en ingles. Por favor, proporcioneme los servicios de un interprete capacitado."

Por ley, las instituciones que reciben fondos federates tienen que ofrecer los servicios de un interprete capacitado para los pacientes que no pueden comunicarse bien en Ingles. Esta ley es para ayudar a que todas las personas tengan igual acceso a los servicios de salud. los servicios del interprete se prestan sin costo al paciente. Le recomendamos que anote el idioma que habla este paciente en su expediente.

"Toi noi ti-ng Vi-t.

Toi khong ~hS noi thong th~o tieng Anh. Xin cung cap cho toi mQt thong djch vi(m co chAt lugng."

Theo lu~t, tftt ca nhung ca quan nhan ti~n tra cAp cua chinh phu lien bang pMi cung dp dich VI cua mQt thong djch vien chuyen nghi~ cho ~nh nhan hay khach hang khOng noi thi, lo ti-ng Anh. I~t nay q~i djnh: tftt ca mQi nguoi deu ,co quyen binh dang trong vi<\$c Sll d'lng nhung djch VI cong cQng Dich VI cua thOng dich vien pMi duqc cung eftp mi~n phi cho b<\$nh . nhan hay khach hang. ChUng toi d~ nghi quy vi nen ghi ~g6n ,ngu ma khach hang SU: d'lng trong doi s6ng hang ngay vao h6 sa cua hQ. l

Based on the results of ATRANS four-factor analysis, ATRANS has done the following:

The City Administration takes reasonable steps in order to ensure meaningful access to ATRANS programs and activities by limited English speaking people. Spanish is the most dominant language spoken by LEP individuals in this service area. All language access activities detailed will be coordinated in collaboration with the ATRANS staff.

All public meetings personnel must review the population of the affected area to determine LEP needs and make requests that individuals advise them of special needs.

## Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which ATRANS staff responds to LEP persons, whether in person, by telephone or in writing.

- Signage
- Public outreach materials;
- Community based organizations;
- Local newspaper;
- Post the ATRANS Title VI Policy and LEP Plan on the City Of Alexandria, LA Website, [www.cityofalexandria.com](http://www.cityofalexandria.com);
- ~~When needed~~, an interpreter for a language other than Spanish, in Person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

## Staff Training

ATRANS provides the following training all staff:

1. Information on the ATRANS Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Documentation of language assistance requests
4. How to handle a potential Title VI LEP complaint

## Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

In addition to the outreach efforts identified earlier in this policy, staff will use the following techniques during its planning studies, as deemed appropriate by staff:

- Presentations to professional, citizen, and student organizations.
- Articles in community newsletters.
- Press releases and meetings with local media representatives.
- Informal conversations with individuals and small groups.
- Interviews with people affected by study recommendations.
- Presentations by experts on various transit-related subjects.
- User and non-user surveys.
- use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps and the Internet.

- Other techniques determine the best methods of involving all segments of the service area population in the planning process.

ATRANS defines an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and transfers the meaning of written text from one language into another.

The ATRANS LEP Plan is on the city's website.

#### **Determination of Site or Location of Facilities**

Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Per 49 CFR 21, (The Public Participation Plan), the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.

Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, and operations centers. Bus shelters are not included in this provision, as they are transit amenities and covered by regulations discussed in Section X of this Title VI Program.

For facilities covered by this provision, recipients are required to:

- 1) Complete a Title VI equity analysis during the planning state with regard to where a project is located to ensure the selected location is without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- 2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis are at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- 3) Provide substantial legitimate justification for locating a project in a location that will result in a disparate impact based on race, color, or national origin, and show that there are no alternative locations that would have a less impact based on race, color, or national origin. In order to show accuracy of both tests, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact based on race, color, or national origin, and then implement the least alternative.

## SERVICE STANDARD POLICIES:

In order to comply with 49 CFR Section 21.5(b) (2) and (7), Appendix C to 49 CFR part 21, and ATRANS has adopted system-wide policies that guard against service design and operational policies that have disparate impacts. System-wide policies differ from service standards in that they are a quantitative threshold. They do take the requirements of Title VI into consideration in that they buffer against any adverse impacts on minority, low-income, transit dependents and general riders. There are two primary system wide service policies that are worthy of note. They are as follows:

ATRANS is required to establish written service standards and policies for four transit indicators because it operates in a small-urbanized area. The four transit indicators are vehicle load, vehicle headway, on-time performance, service availability, and vehicle assignment. This is in accordance with the requirements of FTA Circular 4702.1B (Title VI Program Guidelines for Urban Mass Transit Administration Recipients). It is also done in order to comply with 49 CFR Section 21.5(b) (2) and (7), Appendix C to 49 CFR part 21.

As a result, ATRANS service standards provide a means to support its mission to provide a safe, clean, reliable, cost effective transportation system, which meets transportation needs, contributes to growth and development, and improves the quality of life in the community. An annual review provides a continual analysis of the effectiveness of the services provided to the public. In addition, ATRANS uses the resulting standards during the course of a year as a measure to ensure that there is an on-going quality of service and system integrity.

ATRANS has developed guidelines within its Service Standards' document in order to allow for consistent and continual evaluation of services.

Application of these Service Standards provides assistance in achieving a balance between quality, equity and the cost effective use of limited resources. The availability of financial resources, represented by the annual budget, is the bottom line for these standards. Service reduction may occur on an on-going basis, as appropriate, and/or in times of fiscal constraint, as determined by the Mayor in consultation with the City Council.

<b>Vehicle Load</b> A ratio of the number of passengers on a vehicle to the number of seats	<b>Bus</b> – The average of all loads during the peak operating period should not exceed the following load factors:  1.4 passengers/seat  D/R - N/A
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<b>Vehicle Headway</b> The time interval between two vehicles traveling in the same direction on the same	<b>Bus</b> – all headways are 60 minutes.  D/R – N/A
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route	
<b>Service Availability</b> The service area	<b>Bus</b> – The urbanized area and within ¼ mile of route  <b>D/R</b> – Accommodation of 100% of all trips requested by ADA-qualified patrons within the service area
<b>Vehicle Assignment</b> –Take into account the operating characteristics of the buses within the fleet.	<b>Bus</b> – ATRANS entire bus fleet is identical buses, all 35' low floors (just different year models).  <b>D/R</b> - ATRANS entire van fleet is identical vans, all the same year, make and model.

Vehicle Assignment - will be equitable throughout the system at the divisional level between the maintenance facility and the daily vehicle assignment. Factors to consider include availability and maintenance capabilities. All of our vehicles are the same make and design, therefore, no difference exists.

#### On-time Performance

On-time performance is a measure of service reliability that determines the percentage of buses that arrive or depart within a certain amount of time before or after the published schedule. On-time performance reflects the quality of service and influences a customer's choice to use transit.

A vehicle is on time if it runs no more than one (3) minutes early and no more than five (5) minutes late compared to the scheduled time at each time point. Early arrivals at the final time point are on time.

A system wide on-time performance goal of eighty-five percent (85%) on time is a common industry standard, which allows for some level of service variability while maintaining the reasonable expectation of reliability for customers.

## **GLOSSARY:**

**Adverse Effects:** The totality of significant or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to: bodily impairment, infirmity, illness or death; air, noise and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion or separation of minority and low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of DOT programs, policies, or activities.

**Applicant:** Any eligible entity or organization that submits an application for financial assistance under any FTA program.

**CFR:** Code of Federal Regulations

**Deficient:** A condition where, after a review of a recipient's or sub-recipient's practices, and barring an adequate justification from the recipient or sub-recipient, FTA determines the entity has not followed specific provisions of this circular's required guidance and procedures.

**Discrimination:** Refers to any act or inaction, whether intentional or unintentional, in any program or activity of a federal-aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

**Disparate Impact:** Refers to facially neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient's policy or practice lacks a substantial legitimate justification.

**Disparate Treatment:** Actions that result in circumstances where similarly situated persons are treated differently (i.e., less favorably) than others because of their race, color, or national origin.

**Disproportionately High and Adverse Effect on Minority and Low-Income Populations:** An adverse effect that is predominantly born by a minority population and/or a low-income population and will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low income population.

### **Federal Financial Assistance:**

- (1) Grants and loans of federal funds;
- (2) The grant or donation of federal property and interests in property;
- (3) The detail of federal personnel;
- (4) The sale and lease of, and the permission to use (on other than a casual or transient basis), federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and

- (5) Any federal agreement, arrangement, or other contract that has as one of its purposes the provision of assistance.

**FTA Activity:** Any program of assistance authorized by the Federal Transit Laws at 49 U.S.C. Chapter 53 or the Federal Highway Laws at Title 23 United States Code administered by FTA.

**Grantee:** Direct or indirect recipient of federal financial assistance from FTA.

**Limited English Proficient (LEP) Persons:** Persons for whom English is not their primary language and who have a limited ability to speak, understand, or write English.

It includes people who that do not speak English well or do not speak English at all.

**Low-Income:** A person whose median household income is at or below the Department of Health and Human Services' poverty guidelines.

**Low-Income Population:** Any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

**Minority Person:**

American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.

Black or African American populations, which refers to peoples having origins in any of the Black racial groups of Africa.

Hispanic or Latino populations, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

Native Hawaiian and Other Pacific Islander, which refers to people having origins in any of the original people of Hawaii, Guam, Samoa, or other Pacific Islands.

**Minority Population:** Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

**National Origin:** The particular nation in which a person was born, or where the person's parents or ancestors were born.

**NEPA:** National Environmental Policy Act

**Non-compliance:** An FTA determination that the recipient or sub-recipient has engaged in activities that had have the purpose or effect of denying persons the benefits of, excluding from participation in, or subjecting persons to discrimination in the recipient's program or activity.



**Predominantly Minority Area:** A geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the population of minority persons residing in that area exceeds the average proportion of minority person's in the recipient's service area.

**Predominantly Low-Income Area:** A geographic area, such as a neighborhood, Census tract, or traffic analysis zone, where the proportion of low-income persons residing in that area exceeds the average proportion of low-income persons in the recipient's service area.

**Recipient:** Any state, political subdivision, instrumentality, or any public or private agency, institution, department or other organizational unit receiving federal financial assistance from FTA.

**Secretary:** The Secretary of the Department of Transportation.

**Service Area:** The geographic area in which a transit agency travels by its charter to provide service to the public or the planning area of a state Department of Transportation or Metropolitan Planning Organization.

**Service Standard/Policy:** An established policy or service performance measure used by a transit provider or other recipient, or sub-recipient as a means to plan or distribute services and benefits within its service area.

**Sub-recipient:** Any entity that receives FTA financial assistance as a pass-through from another entity.

**Title VII Program:** A recipient's submission, provided to FTA or to the sub-recipient's direct recipient every three years, containing information in response to the requirements of circular 4702.1B.