



VERMONT

AGENCY OF TRANSPORTATION

**Federal Transit
Administration
Title VI / Environmental
Justice Program
2014**

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**FEDERAL TRANSIT ADMINISTRATION
TITLE VI / ENVIRONMENTAL JUSTICE PROGRAM 2014**

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I. Notification of Title VI Protections

VTrans maintains a statement of policy regarding Title VI protections on its website at the following address:

<http://www.aot.state.vt.us/civilrights/Documents/VTransTitleVINondiscriminationStatement.pdf>

This statement is reproduced below:

It is the policy of the Vermont Agency of Transportation (VTrans) to effectuate Title VI of the Civil Rights Act of 1964, as amended, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all federal programs and activities. Pursuant to this obligation, VTrans requires that no person shall, on the grounds of race, color, creed, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination in any federally-assisted program or activity; neither shall they be denied any service, financial aid or other benefit provided under its programs or experience distinctions in the quality, quantity or manner in which a benefit is provided, suffer segregation or separate treatment in any part of a program, restriction in the enjoyment of any advantages, privileges or other benefits provided to others, different standards or requirements for participation, methods of administration that, directly or through contractual relationships would defeat or substantially impair the accomplishments of effective nondiscrimination, discrimination in any activities related to highway and infrastructure or a facility built or repaired in whole or in part with federal funds and discrimination in any employment resulting from a program, the primary purpose of which is to provide employment.

In addition, VTrans will ensure the monitoring and enforcement of all sub-recipients and participants of federally-assisted projects and activities. VTrans further assures that every effort will be made to ensure nondiscrimination in all of its programs and operations, regardless of the funding source.

In addition to this statement of policy VTrans has the following notification which is incorporated into all VTrans public notices.

**Office of Civil Rights & Labor Compliance**

NOTIFICATION OF YOUR CIVIL RIGHTS

The Vermont Agency of Transportation (VTrans) operates its programs without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been harmed by any unlawful discriminatory practice under Title VI by VTrans or the public transit providers who receive funding from VTrans may file a complaint with the Vermont Agency of Transportation.

For more information on VTrans' Civil Rights program and the obligations and procedures to file a complaint, call (802) 828-2717 or toll-free: 1-800-356-1965. For more information, visit <http://www.aot.state.vt.us/civilrights/Default.htm>.

Notice to comply with Title VI is also made available in contractual documents, and made known to all of Vermont's towns and municipalities by inclusion of Title VI notice language in the Spring, 2012, Vermont Local Roads newsletter. The VLR newsletter has statewide distribution, reaching over two hundred-fifty cities and towns all across Vermont. The most recent edition of the letter is available at this web address:

<http://www.vermontlocalroads.org/Newsletters/2012/Vermont%20Local%20Roads%20News%202012.pdf>

In addition, Title VI notice is provided to the public by working collaboratively with the agency's subrecipient transit and regional partners on continuing efforts to monitor subrecipient activities, train external staff, and to provide guidance and assistance to partner entities as they work to develop and implement their respective Title VI programs. The subrecipient transit providers post Title VI notifications on every transit vehicle in service.

II. Title VI Complaint Procedures and Form

Vermont Agency of Transportation Title VI Complaint Procedure

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin, may file a complaint with the Vermont Agency of Transportation's Office of Civil Rights & Labor Compliance (OCRLC).

The mailing address for written complaints is as follows:

Vermont Agency of Transportation
Office of Civil Rights & Labor Compliance
One National Life Drive
Montpelier, VT 05633-5001.

Complaints may also be submitted by telephone or fax. Contact numbers are as follows:

Phone: (802) 828-2717

Fax: (802) 828-1047

Toll-free: 1-800-356-1965.

Electronic submission of complaints is also permitted. All complaints related to Title VI discrimination should be addressed to Jonathan Goddard, the Title VI and ADA Program Manager at the following address: Jonathan.Goddard@state.vt.us.

Written or faxed complaints must be signed by the complainant. Complaints submitted by telephone or e-mail, or unsigned written or faxed complaints, must be followed by a complaint in writing, signed by the complainant or his/her representative within 10 business days of the initial verbal/electronic/unsigned complaint. If the complainant requires assistance to submit a written document, a member of the OCRLC will interview the complainant and assist the person in converting verbal complaints to writing. This document must be signed by the complainant or his/her representative. Federal and state law require that the complaint be filed within 180 days of the alleged incident of discrimination.

Once the complaint has been submitted in writing, VTrans will pursue the following steps in addressing the complaint:

1. A member of the OCRLC will initiate a Complaint Form (see below).
2. Essential information on the form includes the following:
 - a. Date of the incident that is the subject of the complaint
 - b. Time of the incident
 - c. Location of the incident
 - d. Circumstances of the incident in as much detail as is available, including description of the issues, and the names and job titles of those individuals perceived as parties in the complaint.
3. The completed form, along with the initial complaint letter and a summary of any other communication, will be submitted to the Chief of the OCRLC for review. The Chief will

determine the jurisdiction and acceptability of the complaint and any need for additional information. After any additional information is procured, the Chief will determine whether to accept or reject the complaint.

4. The complainant will be provided with a written notification that VTrans has either accepted or rejected the complaint.
5. A complaint may be rejected for the following reasons:
 - a. More than 180 days passed between the alleged incident and the filing of the initial complaint.
 - b. The allegation does not involve a basis covered under Title VI, such as race, color, or national origin.
 - c. The allegation does not involve VTrans or one of its subrecipients of FTA funds.
 - d. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - e. The complainant cannot be located after reasonable attempts.
6. An accepted complaint will be assigned a case number and be logged in a database maintained by the OCRLC identifying the complainant's name, date of incident, alleged harm, and the race, color, or national origin of the complainant.
7. The Title VI program manager will initiate an investigation of the complaint, assisted by other members of the OCRLC as necessary, and complete a report within 90 days of the acceptance of the complaint. The report shall include a narrative description of the incident, identification of the persons interviewed, findings, and recommendations for disposition.
8. The report will be reviewed by the Chief of the OCRLC and referred to the Legal section of VTrans, if deemed appropriate. The Chief will accept or reject the recommendation for disposition, in consultation with the Legal Officer, and if the individuals involved are found to be in noncompliance with Title VI, remedial actions will be determined.
9. The results of the investigation and the Chief's determination will be mailed to the complainant. Notice shall include information regarding appeal rights of the complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
 - a. VTrans will reconsider the determination if new facts come to light.
 - b. If the complainant is dissatisfied with the determination and/or resolution set forth by VTrans, the same complaint may be submitted to FTA for investigation. Complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, Transportation Center, Kendall Square, 55 Broadway, Suite 920, Cambridge, MA 02142-1093.
10. A copy of the complaint and VTrans' investigation report, letter of finding and remedial action plan will be submitted to FTA within 120 days of the initial receipt of the complaint.
11. A summary of the complaint resolution will be added to the database at OCRLC and this information will be included as part of the next Title VI update to FTA.



VERMONT AGENCY OF TRANSPORTATION

TITLE VI COMPLAINT FORM

_____ External (from citizen/rider/contractor) _____ Internal (from staff/employee)

Date of Report: _____ Date of Incident: _____ Time of Incident: _____

Location of Incident: _____

Circumstances of Incident and Names/Titles of Other Involved Parties: _____

Alleged Harm: _____

Name of person filing complaint: _____ Phone #: _____

Address: _____

Title VI Related? Yes _____ Maybe _____ No _____ (if in doubt, check "maybe")

Name and contact info of witnesses or other relevant parties: _____

Person Taking Report Information: _____

(over)

CHIEF'S SECTION

Discussions with reporting person: Date: _____ Time: _____

Details of discussion: _____

Discussions with involved VTrans employees. Date: _____ Time: _____

Details of discussion: _____

Other action/follow up required (i.e. information gathering, investigation, interviews): _____

_____ Copy to Safety Officer when case is closed.

Signature of Chief: _____ Initials of Title VI Officer: _____

III. Record of Title VI Investigations, Complaints, or Lawsuits

VTrans has no active lawsuits at this time, and has received no Title VI complaints or lawsuits since its last Title VI Triennial submission in 2012.

IV. Public Participation Plan

Public participation is an essential component of the planning process. From short-term service changes to long-range vision documents and investment strategies, input from the public about policies and services that affect them is critical to their successful implementation. The Vermont Agency of Transportation conducts ongoing planning activities as well as periodic programming and planning projects. Each of these has a public participation component as described below.

Ongoing Planning Efforts

The Transportation Planning Initiative (TPI). In this ongoing program, Vermont's 11 Regional Planning Commissions solicit local community input on all transportation related matters. Each regional commission has a transportation advisory committee, or the equivalent, with representation from member municipalities. This committee interacts on a regular basis with staff members of the commission, who in turn provide input to the Agency of Transportation. From time to time the regional commissions also conduct public meetings in their respective regions to gather direct public input on transportation issues and processes.

The State Transportation Improvement Program. Each year, the Agency of Transportation adopts a State Transportation Improvement Program (STIP). The STIP is a three-year, financially constrained plan for obligation of Federal transportation funds. It is closely linked to, and must be consistent with, a five-year capital budget for expenditures, forwarded by the Agency of Transportation to the Vermont legislature annually. Public involvement in the development of the STIP is achieved in a number of ways.

(a) Once each year during June and July, or as soon as possible thereafter following adjournment of the legislature, the Agency of Transportation, in cooperation with the regional planning commissions, holds a public meeting to solicit public comment on the STIP. The Vermont Interactive Television Network may be used to provide simultaneous dispersed geographic access for public input. Accommodations will be made for members of the public who request them including translation services for LEP persons. The public meetings discuss 1) needed amendments to the current year's STIP, arising either from legislative action or from other causes; 2) input and comment on the coming year's STIP. In addition to soliciting comment from the general public, notice for this meeting also solicits comment from affected public agencies, affected public jurisdictions, employee representatives of the Vermont Agency of Transportation (including the Title VI coordinator of the Civil Rights Section) and other affected agencies, private transportation providers, and public transportation providers. Two weeks prior to the meeting, the draft STIP is printed and a public notice about its availability is issued statewide. The notice provides information on how copies of the draft STIP may be obtained, solicits comments on the draft STIP, and provides a schedule for the public meetings. Written comments on the draft STIP are accepted for two weeks following the public meeting. All comments are carefully considered in the development of the final STIP. After publication of the final STIP, documentation on how comments were explicitly addressed are available to the public upon request.

(b) If necessary, each year during November or December, or otherwise as necessary, any major changes to the STIP will be made using a public involvement

process similar to that found in part (a), above. Major changes shall consist of the addition of new large projects (over \$2,000,000) to the STIP, or cumulative changes which would drop a large project out of the STIP. The process shall be the same as found above, excepting that one meeting will be held in a suitable central location and comments will be accepted for three days after the meeting. Affected regional planning commissions will be notified directly in writing of proposed major STIP changes one week prior to the meeting.

The Long Range Transportation Plan. The Agency of Transportation prepares a Long Range Transportation Plan, updated at intervals of no more than five years. Public involvement efforts related to this will include: questionnaires regarding transportation issues, distributed to a statistically valid sample of Vermont residents to assure both demographic and geographic coverage; a number of regional meetings to be held in cooperation with the ongoing regional transportation planning effort; and an overall project Steering Committee containing representation from a diverse spectrum of Vermont residents and interests. VTrans will seek to include representatives from organizations advocating for minorities, immigrants, and low-income Vermonters on the Steering Committee.

Other Planning Efforts. VTrans conducts other periodic statewide planning efforts related to public transportation, such as the Public Transit Policy Plan, the Human Service Transportation Coordination Plan, and Short Range Transit Plans. Separate public involvement plans are developed for each of these planning projects in cooperation with contractors who perform the studies.

Public Outreach Plan

VTrans is actively engaged in developing a comprehensive public outreach plan. As of May, 2014, the Plan exists in outline form consisting of ten chapters as listed below:

- I. Introduction
- II. VTrans & the Public
- III. Building the Foundation for Effective Outreach
- IV. Requirements for Public Involvement
- V. Building Partnerships with Stakeholders at Different Levels
- VI. Creating a Public Involvement Plan
- VII. Tailor Outreach to the Project
- VIII. Successful Public Meetings
- IX. Public Hearings
- X. Working with the Media

Chapters II through V as well as VIII and IX have subsections that deal specifically with Title VI-related issues and groups.

When completed, this plan will provide excellent guidance for VTrans staff as well as that of VTrans' subrecipients on how to conduct effective and inclusive outreach that attains the goals of Title VI. Future iterations of this Title VI Program will include more detail from the Public Outreach Plan.

Measures to Ensure Minority, Low-Income and LEP Participation

As public transportation is perhaps disproportionately relevant to the daily lives of Title VI-protected groups and low-income Vermonters, VTrans will ensure that groups that represent these populations are included in these outreach efforts and that representatives of these organizations are invited to participate in project steering committees.

All public meetings held as part of this public involvement process will be properly noticed in accordance with the requirements of Title VI of the civil rights act of 1964 and the Vermont public meeting law (Vermont Title 1, section 310 et seq., as annotated), including public announcement of all meetings at least 24 hours before the meeting. Notes are taken at all meetings so that members of the public are not required to submit written comments in order to have their opinions recorded.

VTrans and the regional planning commissions maintain contact with organizations that represent the interests of low-income, immigrant, and minority groups and notify them of upcoming public outreach activities. Many of these organizations are concentrated in Chittenden County, due to the large percentage of Vermont's minority and immigrant communities that live there.

Meeting times and locations are designed to maximize accessibility for low-income and minority groups. A mix of daytime and early evening meetings are scheduled and transit access to the meeting is guaranteed, including an extension of service span, if necessary, to provide rides home at the end of the meeting.

The Office of Civil Rights at VTrans verifies that the meeting locations for VTrans planning projects are held in locations that are conveniently situated with respect to minority and low income populations within each region. The table below shows all of the public meetings held over the past three years for VTrans planning projects and their relationship to areas with concentrations of minorities and low income individuals as illustrated in the maps in Section VIII below.

Public Meeting	Date	Location	Title VI Concentration
Public Transit Advisory Council, open to the public	5/15/12	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	9/13/12	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	12/6/12	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	3/7/13	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	6/20/13	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Pre-bid meeting for Intercity Bus RFP Process	9/10/13	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	9/13/13	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	1/9/14	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Human Service Transportation Coordination Plan	4/28/14	Rutland, VT	Rutland, transit accessible

Human Service Transportation Coordination Plan	5/8/14	Norwich, VT	Hartford/Norwich, transit accessible
Human Service Transportation Coordination Plan	5/28/14	Morrisville, VT	Johnson/Morristown, transit accessible

VTrans plans increased use of Vermont Interactive Television to increase the access and reduce transportation costs for populations all over Vermont.

In 2014 and beyond, VTrans will continue to encourage the participation of Title VI-protected groups in public outreach activities. Notices for public meetings will include a statement in Spanish and French that translation services languages are available upon request and a telephone number for more information about the meeting. In Chittenden County, the same statements will also be included in Serbo-Croatian, Chinese, and Vietnamese. “I Speak” cards will be made available at all public meetings.

At least two weeks, but preferably one month prior to any public meeting held by VTrans for a statewide planning effort, the project manager will contact organizations representing low-income, minority and LEP individuals in the region where the meeting will be held. The project manager will discuss specific steps to encourage participation by these Title VI-protected groups.

In its oversight of transit providers, VTrans will require that the providers contact these representative organizations in their service area at least two weeks and preferably one month in advance of any public meetings or hearings being held regarding service changes, fare changes, or any other planning efforts. VTrans will maintain a master list of these organizations statewide and communicate these to the providers. VTrans will also coordinate with the regional planning commissions through the TPI, to ensure outreach to Title VI-protected groups.

V. Access to Services by Persons with LEP

A. Introduction

On Aug. 11, 2000, President Clinton signed Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. The executive order was issued to ensure accessibility to programs and services to otherwise eligible individuals not proficient in the English language.

The executive order stated that individuals with a limited ability to read, write, speak and understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, “LEP,” or Limited English Proficient.

The USDOT published “Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficiency” in the Dec. 14, 2005, Federal Register. The guidance explicitly identifies state agencies such as VTrans as organizations required to follow Executive Order 13166.

The guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient’s entire program or activity; i.e., to all parts of a recipient’s operations.

To meet Title VI and LEP requirements of the FTA, VTrans will evaluate, on a continuing basis, activities that would be appropriate for compliance with LEP requirements.

B. Elements of an Effective LEP Policy

This LEP program has four main components to aid in identifying LEP persons so that they are provided meaningful access to VTrans services and activities that may affect their quality of life. For the purposes of this plan, only those individuals who were identified in the 2008-2012 American Community Survey as having their ability to speak English as “less than very well” are being considered as LEP. The four components are as follows:

- 1. Identifying LEP persons who need language assistance.** According to the 2008-2012 American Community Survey, 8,921 citizens of the state of Vermont ages 5 or older spoke English less than very well, representing 1.50% of the population. The largest language-group among these LEP persons was French with 1,800 LEP individuals, reflecting French-Canadians who are represented in rural areas across the northern tier of Vermont, and an influx of refugee populations, particularly from Bosnia during the latter half of the 1990s. Spanish speakers were the second largest group, with 1,705 LEP individuals. These groups each represent about 0.3% of the total population. Maps and tables presented below in the Four Factor Analysis show the number and percentages of LEP persons by town for all languages combined, and by county for French and Spanish. Other efforts to identify LEP persons besides the use of Census data are described below.
- 2. Identifying ways in which language assistance will be provided.** VTrans provides oral and written translation; written interpretation and translation; and sign language, as requested, or as a result of an LEP analysis on any given project or projected program. VTrans will continue to examine its services and survey its employees and subrecipients

to determine the extent of contact or the possibility of contact with LEP individuals; and the frequency of contact and the services where LEP individuals are likely to access a program, service, or activity, on an annual basis, or as needed. Telephone translation services through Voiance are available to VTrans and all of the subrecipients (see below for more information).

3. **Training staff and others.** All VTrans staff involved in public outreach and public involvement receive training on identifying LEP populations and providing LEP translation and interpretation. Sub-recipients and the CCRPC must provide LEP services to be in compliance with Title VI and Executive Order 12898. Sub-recipient reviews are conducted to ensure compliance with this executive order.
4. **Providing notice to LEP persons.** After LEP populations have been identified, strategies are developed to provide notice of a program, service, or activity, using appropriate media, including brochures (also in languages other than English). Community groups serving LEP populations are contacted, as well as schools, church groups, chambers of commerce, and other relevant entities.

C. Four Factor Analysis

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number and proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP community.
4. The resources available to VTrans and overall cost.

Factor 1 – Prevalence of LEP Persons

As mentioned above, Vermont has a very low percentage of people who don't speak English very well at 1.50%. The analysis below will look at these numbers in more detail, but the LEP Guidance from DOT recommends that “[r]ecipients should first examine their prior experiences with LEP individuals and determine the breadth and scope of language services that are needed.”

Within the realm of public transportation, VTrans interacts with LEP persons in two primary ways. In terms of direct experience, VTrans may come in contact with LEP individuals at public meetings or public hearings associated with planning efforts. VTrans has a number of periodic planning efforts wholly within or related to public transportation that entail public review and comment:

- Long Range Transportation Business Plan
- Public Transit Policy Plan
- Short Range Transit Plans
- Human Service Transportation Coordination Plan

In addition to these, there are studies of specific issues that may also entail public outreach. One example is the study of high speed rail from Boston to Montreal.

At public meetings for any of these projects, it is incumbent upon VTrans to provide a means for LEP individuals to participate in a meaningful way. In advertising the meetings, VTrans indicates that translation services are available upon request. Given the very low prevalence of LEP individuals, this service has not been requested at a meeting in the past three years. Translation services were employed in November 2013 during a motor vehicle hearing, but this was not related to any FTA project or program. For projects located in an area with a higher prevalence of LEP persons—which is mainly restricted to central Chittenden County—VTrans and the CCRPC (if applicable) also work with community organizations representing immigrant populations to encourage participation and facilitate communication.

Other than these outreach efforts, there is little reason for the general public to contact VTrans directly about public transportation issues. Thus, the other primary form of interaction of LEP individuals with VTrans is through subrecipients. The nine public transit providers in Vermont have more direct contact with LEP persons than VTrans, though the degree of interaction varies across the state. It is the responsibility of the nine providers—which include one transit authority, one transit district, and seven private non-profit agencies—to deploy the resources necessary to ensure that LEP individuals have fair access to the available services. However, it is VTrans' responsibility as the FTA grant recipient to monitor the efforts of the providers and ensure compliance with Executive Order 13166.

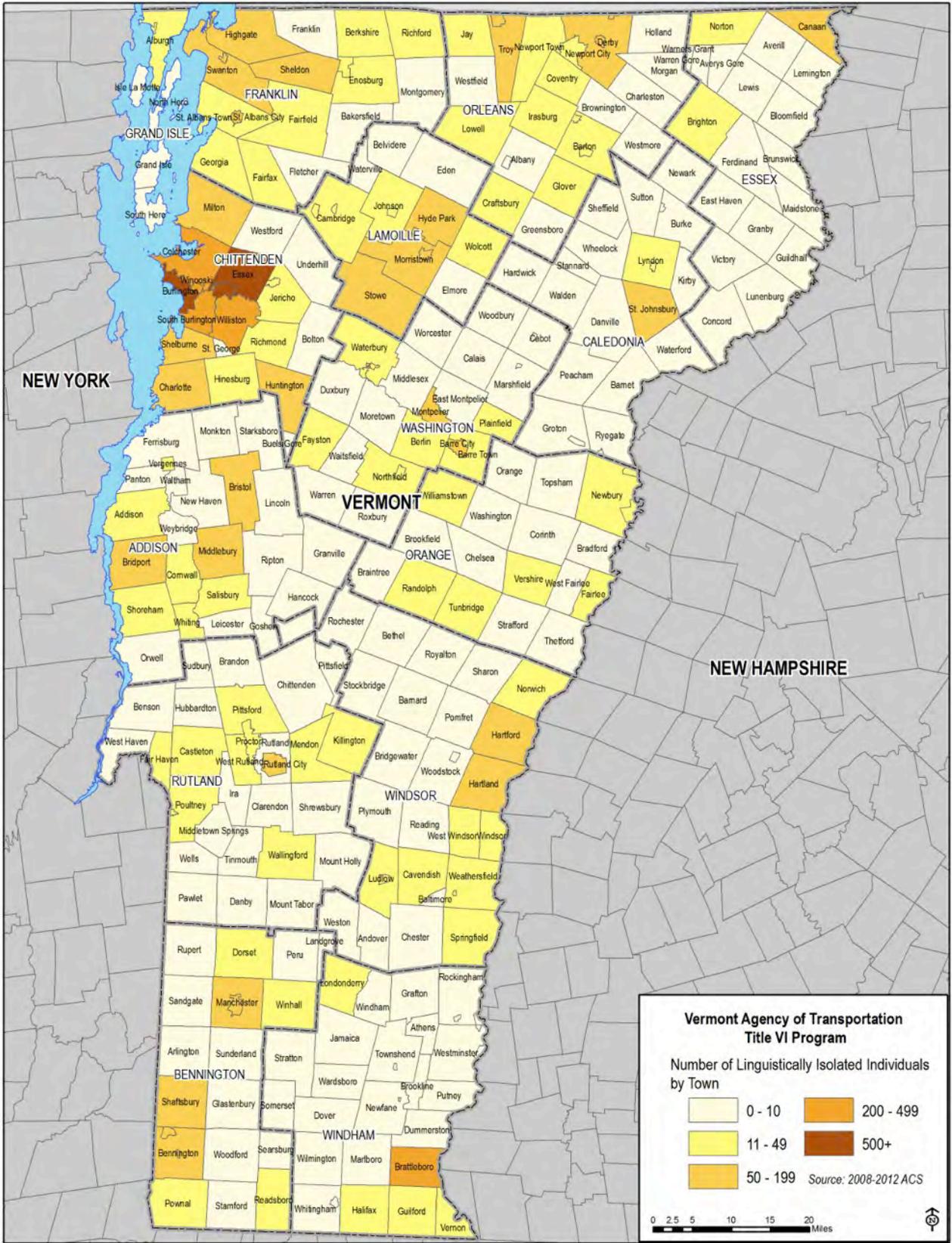
The forms of LEP interaction experienced by the transit providers include the following:

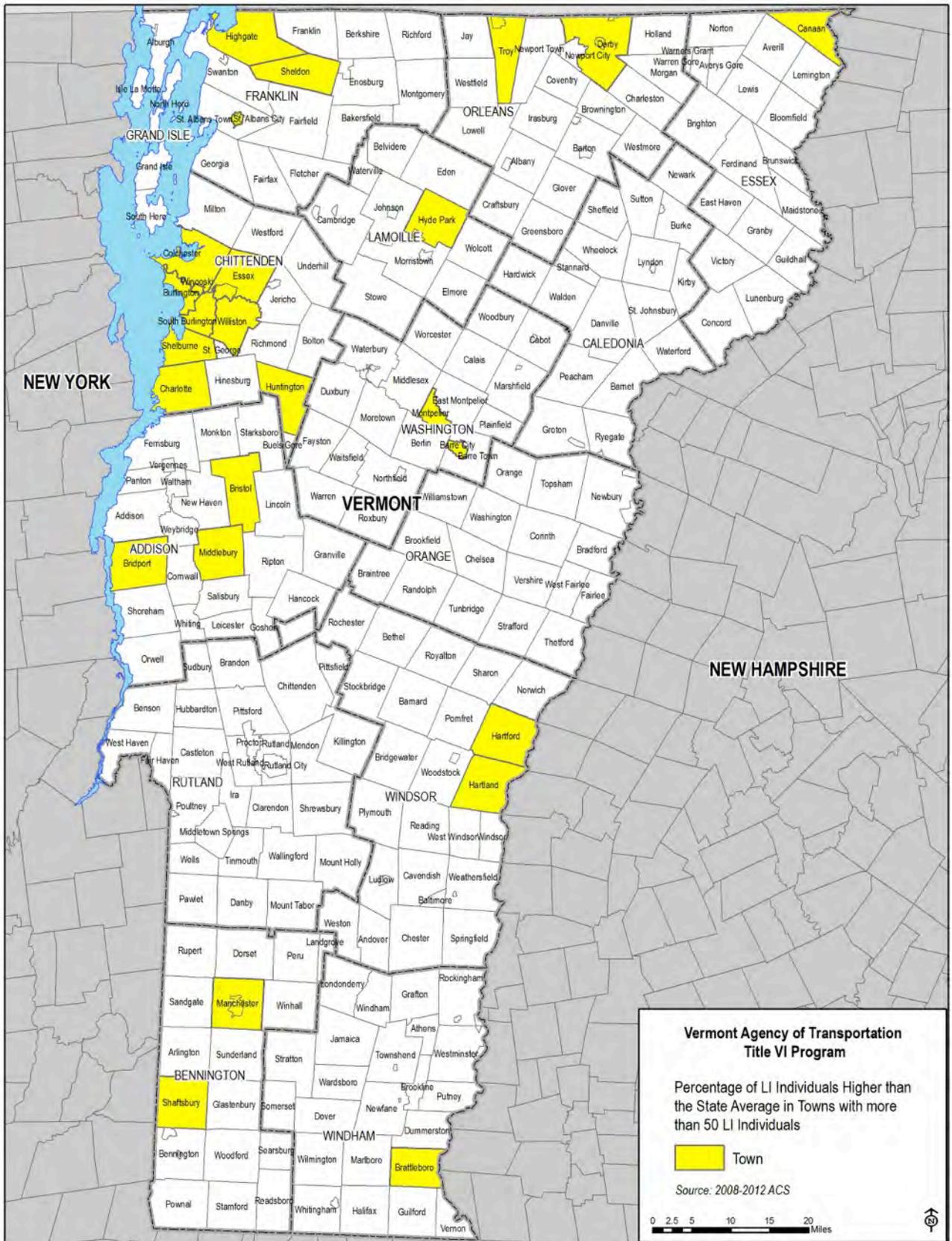
- Providing basic information on how to use public transit services in the area
- Purchasing fare media
- Making reservations on demand-response services such as ADA complementary paratransit, Elders and Persons with Disabilities transportation, and general public dial-a-ride
- Handling passenger complaints
- Gathering data such as on-board customer surveys.

In its ongoing communications with the transit providers and annual reviews, VTrans gauges the degree to which any of the providers have LEP interactions, and works to ensure that appropriate resources are deployed to comply with the regulations.

The maps presented below illustrate where LEP individuals reside in the state of Vermont. These are based on 2008-2012 American Community Survey data. The first map shows the number of individuals by town who speak English “less than very well.” In 52 of the 251 minor civil divisions in Vermont, there are zero people who are “linguistically isolated” (i.e. speaking English less than very well). In another 102 towns, there are between 1 and 10 linguistically isolated individuals. The LEP guidance from DOT indicates lower requirements for recipients that serve “very few” LEP individuals; the Safe Harbor provision in FTA Circular C 4702.1B (page III-9) indicates 50 individuals is the threshold for reduced requirements. In total, 222 of Vermont's 251 cities and towns (88%) have 50 or fewer LEP individuals. There were only 15 municipalities with more than 100 LEP individuals; seven of these were in Chittenden County.

The second map shows municipalities that have at least 50 LEP individuals where the percentage of such individuals is higher than the statewide average of 1.50%. These cities and towns represent “concentrations” of LEP individuals that VTrans and the transit providers need to be aware of.





It is clear from the data, as well as from the experience of the transit providers, that LEP is not a widespread issue in Vermont. Outside of the core of Chittenden County, there are only eight towns where there are 100 or more people who don't speak English very well. Two of these, Bennington and Middlebury, are towns with colleges that have significant international student populations. The only other cluster of LEP individuals is in central Washington County, in the cities of Montpelier and Barre.

The next step in the analysis was to consider specific language groups and where there are concentrations of individuals who do not speak English well. In the maps above, it can be seen that at the town level, the numbers of people who do not speak English well are small. When these groups are broken down further into specific languages, the numbers become even smaller. Therefore, this phase of analysis was undertaken at the county level.

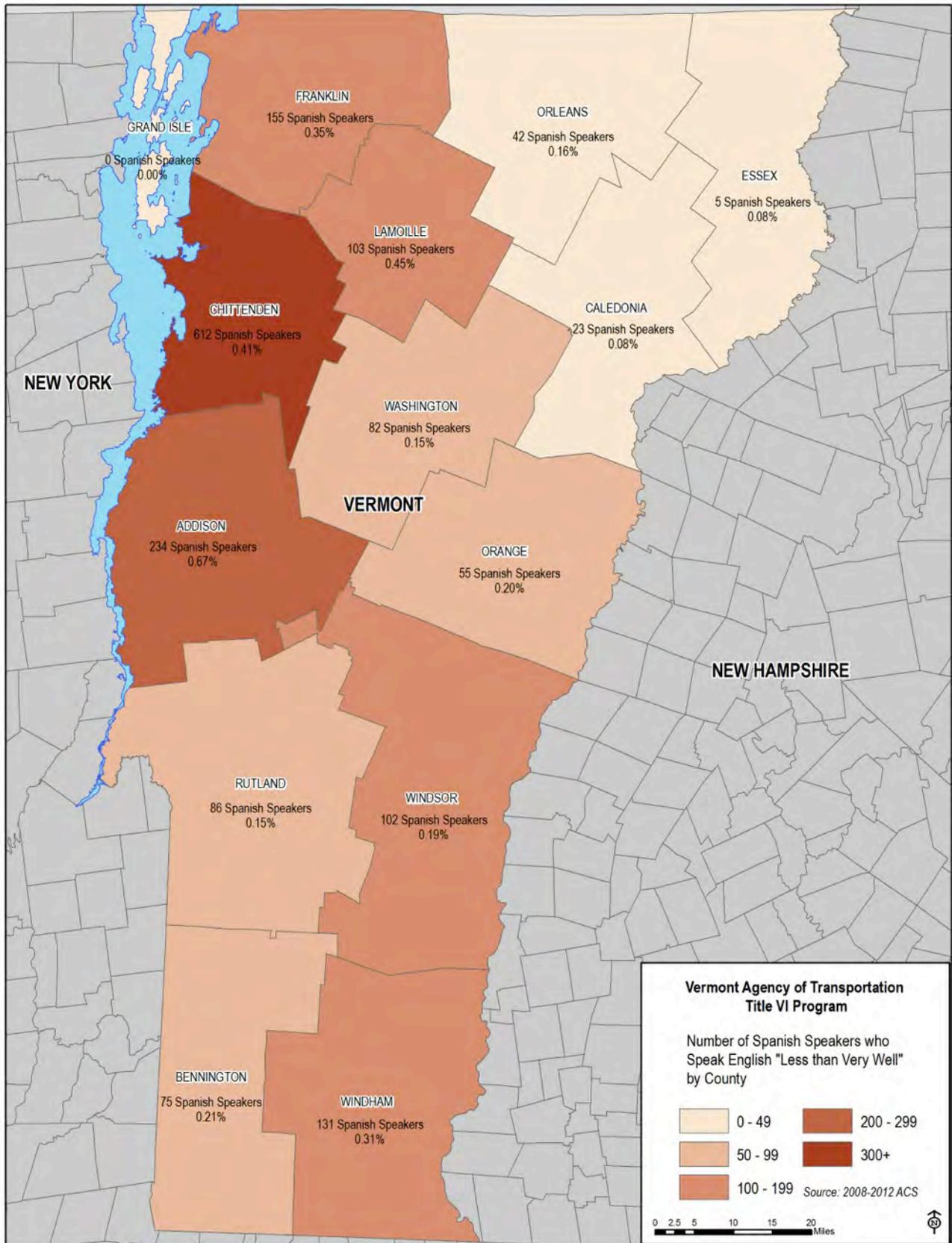
The fourteen counties in Vermont correlate roughly to the nine transit providers; for the most part, the providers' service area boundaries coincide with county boundaries. In the northern part of the state, Rural Community Transportation covers three counties, and the Chittenden County Transportation Authority and Green Mountain Transit Agency together cover five counties. The other providers mostly cover a single county, with Windsor County being divided between Stagecoach Transportation Services and Connecticut River Transit.

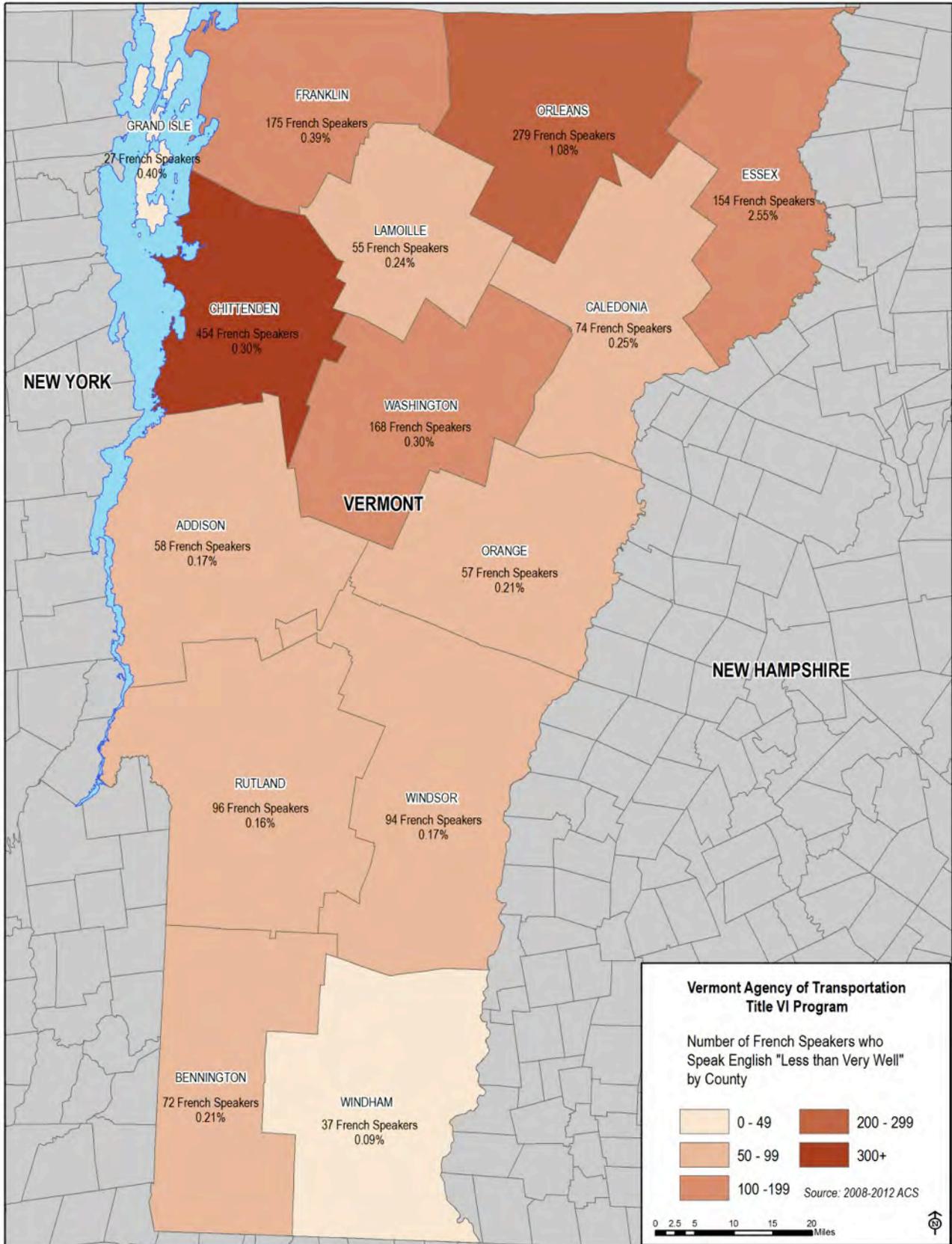
As mentioned above, most interactions between LEP individuals and the public transportation system in Vermont are likely to happen at the level of the transit provider, rather than with VTrans staff. Thus, it makes sense to consider concentrations of LEP persons by language group at the county level rather than at the town or state level.

The maps on the next two pages display the number of persons who speak English "less than very well" and whose primary language is Spanish or French. Statewide, these are the only two languages that have more than one thousand individuals who speak English less than very well. On the Spanish map, it can be seen that only two counties, Addison and Chittenden, have over 200 Spanish-speaking individuals that speak English less than very well. In only Addison county is the percentage of people in this group more than one half of one percent of the population.

On the French map, a clear bias toward the northern tier of counties is visible, due to its proximity to Quebec and historical migration patterns and interactions with the Canadian province. Five northern counties have more than 150 French-speaking individuals who speak English less than very well, and the percentage rises to 2.55% in sparsely-populated Essex County. Rural Community Transportation, which covers Essex, Orleans, and Caledonia Counties, publishes its schedule and map booklet and other documents in French and English to accommodate these individuals.

Information about all other languages spoken in Vermont is shown on the table following the maps. This information, as well as the data for the maps, is drawn from the 2008-2012 American Community Survey from the US Census. It can be seen that no language group surpasses 1,000 individuals or 5% of the population in any county in Vermont. Thus, according to the safe harbor provision in the federal guidance for LEP, oral translation services provided by VTrans, as well as access to written translations when requested, are sufficient to meet the requirements for accommodations for LEP individuals. As noted above, transit providers overseen by VTrans are addressing the needs of LEP individuals where there are sufficient numbers and concentrations to do so. As noted in section IV, VTrans will continue and expand its outreach efforts to the LEP community to ensure that the needs of these individuals are met by VTrans and the transit providers.





Number of Individuals Who Speak English Less than Very Well by Language and County

Language	Vermont	Addison County	Bennington County	Caledonia County	Chittenden County	Essex County	Franklin County	Grand Isle County	Lamoille County	Orange County	Orleans County	Rutland County	Washington County	Windham County	Windsor County
Total Population	593,823	35,114	35,081	29,518	148,904	6,045	44,882	6,690	22,974	27,531	25,796	58,845	56,398	42,196	53,849
Spanish or Spanish Creole	1,705	234	75	23	612	5	155	-	103	55	42	86	82	131	102
French (incl. Patois, Cajun)	1,800	58	72	74	454	154	175	27	55	57	279	96	168	37	94
Italian	133	10	12	4	55	-	4	-	17	3	-	-	25	3	-
Portuguese or Portuguese Creole	130	3	-	1	89	4	-	1	26	-	-	5	-	1	-
German	291	12	48	2	41	-	4	3	15	30	10	7	31	23	65
Yiddish	2	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Other West Germanic languages	52	6	-	5	9	-	-	-	-	-	-	26	-	-	6
Scandinavian languages	23	3	-	-	-	-	-	-	-	6	4	7	-	3	-
Greek	17	-	-	-	15	-	-	-	-	-	-	2	-	-	-
Russian	123	3	16	-	67	2	-	-	-	3	6	1	15	-	10
Polish	98	-	21	-	47	2	9	-	-	-	5	9	-	-	5
Serbo-Croatian	771	44	-	-	605	-	-	1	-	-	4	4	85	-	28
Other Slavic languages	36	-	-	-	7	-	-	-	4	-	4	8	2	11	-
Gujarati	59	-	38	-	-	-	-	-	-	-	-	-	-	-	21
Urdu	89	-	-	-	83	-	-	-	-	-	-	-	6	-	-
Other Indic languages	558	3	-	-	487	-	-	-	53	-	3	-	11	1	-
Other Indo-European languages	116	-	-	-	67	-	-	-	-	-	-	18	-	22	9
Chinese	901	13	5	60	617	3	81	-	4	-	15	33	11	16	43
Japanese	112	19	8	3	55	-	-	-	-	-	-	22	5	-	-
Korean	181	35	4	-	55	-	6	-	-	16	2	-	8	1	54
Thai	109	3	-	-	24	-	12	-	-	1	-	21	20	28	-
Laotian	78	-	-	-	19	-	-	-	-	-	-	-	-	59	-
Vietnamese	694	-	11	-	633	-	-	-	-	9	-	16	15	10	-
Other Asian languages	313	5	26	-	191	3	64	-	-	-	-	-	13	11	-
Tagalog	63	2	-	-	55	-	-	-	-	-	-	-	6	-	-
Other Pacific Island languages	9	-	-	-	7	-	-	-	-	2	-	-	-	-	-
Other Native N. Amer. languages	15	-	-	-	-	-	-	-	-	-	-	14	-	-	1
Hungarian	5	-	-	3	-	-	-	-	-	-	-	2	-	-	-
Arabic	133	-	-	-	131	-	-	-	-	-	2	-	-	-	-
Hebrew	33	-	-	-	33	-	-	-	-	-	-	-	-	-	-
African languages	261	3	-	-	233	-	-	-	-	-	-	15	-	10	-
Other and unspecified languages	11	-	-	-	-	-	-	-	-	-	11	-	-	-	-

Source: 2008-2012 American Community Survey

Percentage of Population that Speaks English Less than Very Well by Language and County

Language	Vermont	Addison County	Bennington County	Caledonia County	Chittenden County	Essex County	Franklin County	Grand Isle County	Lamoille County	Orange County	Orleans County	Rutland County	Washington County	Windham County	Windsor County
Spanish or Spanish Creole	0.29%	0.7%	0.2%	0.1%	0.4%	0.1%	0.3%		0.4%	0.2%	0.2%	0.1%	0.1%	0.3%	0.2%
French (incl. Patois, Cajun)	0.30%	0.2%	0.2%	0.3%	0.3%	2.5%	0.4%	0.4%	0.2%	0.2%	1.1%	0.2%	0.3%	0.1%	0.2%
Italian	0.02%	0.0%	0.0%	0.0%	0.0%		0.0%		0.1%	0.0%			0.0%	0.0%	
Portuguese or Portuguese Creole	0.02%	0.0%		0.0%	0.1%	0.1%		0.0%	0.1%			0.0%		0.0%	
German	0.05%	0.0%	0.1%	0.0%	0.0%		0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.1%	0.1%	0.1%
Yiddish	0.00%	0.0%													
Other West Germanic languages	0.01%	0.0%		0.0%	0.0%							0.0%			0.0%
Scandinavian languages	0.00%	0.0%								0.0%	0.0%	0.0%		0.0%	
Greek	0.00%				0.0%							0.0%			
Russian	0.02%	0.0%	0.0%		0.0%	0.0%				0.0%	0.0%	0.0%	0.0%		0.0%
Polish	0.02%		0.1%		0.0%	0.0%	0.0%				0.0%	0.0%			0.0%
Serbo-Croatian	0.13%	0.1%			0.4%			0.0%			0.0%	0.0%	0.2%		0.1%
Other Slavic languages	0.01%				0.0%				0.0%		0.0%	0.0%	0.0%	0.0%	
Gujarati	0.01%		0.1%												0.0%
Urdu	0.01%				0.1%								0.0%		
Other Indic languages	0.09%	0.0%			0.3%				0.2%		0.0%		0.0%	0.0%	
Other Indo-European languages	0.02%				0.0%							0.0%		0.1%	0.0%
Chinese	0.15%	0.0%	0.0%	0.2%	0.4%	0.0%	0.2%		0.0%		0.1%	0.1%	0.0%	0.0%	0.1%
Japanese	0.02%	0.1%	0.0%	0.0%	0.0%							0.0%	0.0%		
Korean	0.03%	0.1%	0.0%		0.0%		0.0%			0.1%	0.0%		0.0%	0.0%	0.1%
Thai	0.02%	0.0%			0.0%		0.0%			0.0%		0.0%	0.0%	0.1%	
Laotian	0.01%				0.0%									0.1%	
Vietnamese	0.12%		0.0%		0.4%					0.0%		0.0%	0.0%	0.0%	
Other Asian languages	0.05%	0.0%	0.1%		0.1%	0.0%	0.1%					0.0%	0.0%	0.0%	
Tagalog	0.01%	0.0%			0.0%								0.0%		
Other Pacific Island languages	0.00%				0.0%					0.0%					
Other Native N. Amer. languages	0.00%											0.0%			0.0%
Hungarian	0.00%			0.0%								0.0%			
Arabic	0.02%				0.1%						0.0%				
Hebrew	0.01%				0.0%										
African languages	0.04%	0.0%			0.2%							0.0%		0.0%	
Other and unspecified languages	0.00%										0.0%				

Source: 2008-2012 American Community Survey

Factor 2 – Frequency of Contact with LEP Persons

As indicated in discussion of Factor 1, VTrans is most likely to have direct contact with LEP individuals at public meetings associated with public transportation planning efforts. VTrans operates no transit service. VTrans staff does handle phone calls and e-mails from the public for its vanpool/rideshare program, Go Vermont. Though in six and a half years there have been no LEP persons calling in to use this service, on call translation via telephone is available if anyone should do so (see table at the end of this section).

The following is a list of all public meetings held by VTrans over the past two years that were related to FTA-funded activities.

Public Meeting	Date	Location	Agency
Public Transit Advisory Council, open to the public	5/15/12	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	9/13/12	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	12/6/12	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	3/7/13	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	6/20/13	VTrans headquarters, Montpelier	All Vermont
Pre-bid meeting for Intercity Bus RFP Process	9/10/13	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	9/13/13	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	1/9/14	VTrans headquarters, Montpelier	All Vermont
Human Service Transportation Coordination Plan	4/28/14	Rutland, VT	MVRTD
Human Service Transportation Coordination Plan	5/8/14	Norwich, VT	STSI, AT
Human Service Transportation Coordination Plan	5/28/14	Morrisville, VT	GMTA, RCT

At none of these meetings were there LEP individuals who were not able to participate because of inadequate English skills. VTrans received no advance request for translation services at any of these meetings. VTrans will continue to advertise the availability of translation services in the languages most likely to be encountered in any area, including on its website. These languages will be selected based on continued monitoring of Census data and, more importantly, discussions with community organizations representing immigrant populations in the local areas.

On an ongoing basis, the nine transit providers who are the subrecipients of FTA funds are more likely to have direct contact with LEP individuals. See section D below for more discussion of VTrans' oversight of LEP compliance of its subrecipients.

Factor 3 – Importance to LEP Persons of Program, Activities and Services

Many LEP persons, at least in the short term, rely on public transportation for their mobility needs. The nine public transit providers are responsible for ensuring that LEP individuals are not

hindered from using local transit systems because of the inability to speak English well. VTrans must ensure through its oversight activities that the providers are upholding this responsibility.

In addition, as the state transportation agency responsible for coordinating the statewide transportation planning process, VTrans must make sure that all segments of the population, including LEP persons, have been involved or have had the opportunity to be involved with the planning process. The impact of proposed transportation investments on underserved and under represented population groups are part of the evaluation process. VTrans provides oversight and ensures in its own planning projects that LEP and other protected classes of persons are not overlooked in the transportation planning process.

In its ongoing communication with organizations representing immigrant and low-income populations, VTrans will make sure that the state and its subrecipients are carrying out these LEP responsibilities effectively. The largest of these agencies is the Vermont Refugee Resettlement Program (VRRP). Another relevant agency is the Vermont Immigration and Asylum Advocates, based in Burlington. The table on the next page shows the number of refugee arrivals in Vermont by origin country over the past 20 years. A recent influx of refugees from Bhutan has spurred CCTA to hold a travel training for Bhutanese seniors in late 2013. CCTA has also published a one-page “how-to-ride” guide in Nepalese in 2013 to serve this community.

Factor 4 – Resources Available and Cost

Because of the very low incidence of LEP persons in Vermont overall, the cost to accommodate them has not been burdensome. VTrans provides in-person and telephone translation services for all VTrans activities and VTrans subrecipients as well. The transit providers were explicitly added to the Voiance contract in February 2012. See pages 27-30 for details on Voiance services. It is not foreseen that the resources available or the cost of translation services will hinder the accommodation of the needs of Vermont’s LEP population.

D. Oversight of Subrecipients’ LEP Programs

Each of the transit providers who are subrecipients of FTA funds has an LEP plan in place, and VTrans will continue to monitor the compliance of this plan with federal regulations. The transit providers will be asked to track interactions with LEP persons that resulted in not addressing the needs of that individual, whether it occurred in the field (on the bus) or in the course of contact with office staff (such as a reservation specialist or a front-desk employee answering questions in person or on the phone). The providers will also be responsible for maintaining contact with local organizations that represent immigrant populations to stay abreast of changes in the mix of languages in their service areas.

As of 2014, CCTA is by far the most likely agency to come into contact with LEP persons and some recent measures taken by CCTA are discussed above. Another agency that has experienced some interactions with LEP individuals is Rural Community Transportation in the Northeast Kingdom (Newport, St. Johnsbury, Lyndon, Derby) due to a significant number of residents whose primary language is French. Two of RCT’s four reservation specialists are proficient in French, as are many of its drivers. RCT occasionally translates some of its documents into French when it expects to encounter these LEP individuals. Green Mountain Community Network, based in Bennington has developed a full protocol for accommodating LEP individuals. The agency has posted a multi-lingual sign in its lobby, updated its schedule and website information with LEP information, trained its drivers regarding appropriate response to LEP passengers, and two managers have participated in the LLE-LINK Telephone Training.

**SUMMARY OF VERMONT REFUGEE RESETTLEMENTS
1994 - 2013**

Country of Origin	FY-94	FY-95	FY-96	FY-97	FY-98	FY-99	FY-00	FY-01	FY-02	FY-03	FY-04	FY-05	FY-06	FY-07	FY-08	FY-09	FY-10	FY-11	FY-12	FY-13	TOTAL
Burundi				1							12	11		43	29	9					105
Cameroon											1										1
Central African Rep.											6	1									7
Congo - Brazzaville							35	3	17	13	45	16	5	10							144
Dem. Rep. of Congo														9	3	2	16	11		1	42
Eritrea																				1	1
Ethiopia														3							3
Ghana													1								1
Guinea											1										1
Ivory Coast													1								1
Kenya									6												6
Liberia													5	1							6
Nigeria						2			1	1											4
Rwanda												8	1							1	10
Somalia										19	143	129	95	58	16	86	27			25	598
Sudan					5			39	1	8	26	18	24	6	10	2		1		3	143
Togo								9		2	1	13				1					26
Uganda													4								4
China									1	1		4									6
Bosnia	104	124	161	238	318	272	198	162	83	26	9	4									1,699
Kosovo						58															58
Moldova									1	2	1			1							5
Azerbaijan										18	15		1								34
FSU		5	12	8																	25
Georgia													6								6
Kazakhstan													1								1
Russia												26	42	26	5						99
Uzbekistan												2	53								55
Afghanistan					8			11	10							1					30
Iran					8																8
Iraq	18	28													60	28	17	4	10	19	193
Turkey															6						6
Bhutan															129	158	189	311	298	256	1,341
Sri Lanka													1			7					8
Burma															71	40	55	34	42	17	259
Vietnam	131	79	80	32	39	55	42	17	5			5									485
Grand Total	253	236	253	279	378	387	275	241	125	90	260	237	240	157	329	334	304	361	350	323	5,412

Data provided by VRRP. Fiscal years begin on October 1 of the previous calendar year. Figures include only refugees resettled by VRRP and do not include asylees nor people who moved to or from Vermont after initial resettlement.

**VERMONT AGENCY OF TRANSPORTATION
TRANSLATION AND INTERPRETATION
LIMITED ENGLISH PROFICIENCY (LEP)
RESOURCES**

	Service Provider	Contact	Fee Structure
IN-PERSON INTERPRETATION	<p>Association of Africans Living in Vermont (AALV) 20 Allen Street, 3rd Floor Burlington, VT 05401</p>	<p>To request an interpreter: Web: www.AALVInterpreter.org Phone: (802) 985-3106 Email: AALVInterpreter@yahoo.com</p>	<ul style="list-style-type: none"> • 5 days prior notice required • Base rate of \$50 p/hr-15 minute minimum/15 minute increments thereafter • No surcharge after hours, weekends, or holidays • First 50 miles-no charge thereafter State rate applies • Cancellations: 12 hr notice no charge; less than 12 hr notice, 1 hr rate applied • Telephone confirmation of appointment available for client for \$5 per appointment
TELEPHONIC INTRERPRETATION/ WRITTEN TRANSLATION	<p>Voiance Translation Services, Inc. 5780 North Swan Road Tuscon, AZ 85718</p>	<p>Christy Liu, Voiance Account Manager Phone: (866) 742-9080 ext. 1828 Fax: (520) 745-9022 Email: cliu@voiance.com Web: www.voiance.com</p>	<ul style="list-style-type: none"> • Rate is \$1.21 per minute • Fax or email document to Christy Liu for written translation services



Voiance Language Services

Over-the-Phone Interpretation - Issue Reporting and Resolution Process

Contact information:

Voiance 24-hour Client Services Support

support@voiance.com

800-481-3289

Process Steps:

1. Client submits issue/feedback to Voiance Client Services via support@voiance.com or phone if appropriate.
2. Voiance will acknowledge receipt of the issue/feedback immediately.
3. The issue/feedback summary must include: client contact name, language requested, date/time, interpreter ID# (if applicable), and a brief, yet detailed, summary of what occurred.
4. Voiance Client Services will review the issue/feedback to properly log, categorize (ex: System, Telco, Interpreter) and assign to an appropriate representative.
5. Voiance representative will begin an investigation which may include reviewing call log reports, conducting interpreter interviews, or consulting company systems analysts or telco provider technicians.
6. Voiance representative will analyze all pertinent information to determine appropriate resolution.
7. Voiance will report the investigation results and resolution next steps to the Client within 48 hours.

Required information for submitting feedback – (Sample Outline):

Client Name:

Staff member name/#:

Site/Location:

Service: Voiance Over-the-Phone Interpretation Services

Type: Complaint Commendation General Feedback

Issue: Service/Access Interpreter Technical

Date of Occurrence:

Time of Occurrence:

Language:

Interpreter ID# (if applicable):

Detailed description of feedback (please use specific examples):

**LLE Link
Language Request Codes**

Afrikaans	701	Laotian	732
Akan	723	Latvian	733
Albanian	702	Levantine	541
Amharic	91	Lingala	734
Arabic	92	Lithuanian	735
Armenian	772	Macedonian	775
Ashante Twi	510	Malagasy	736
Assyrian	502	Malay	737
Azerbaijani	778	Malayalam	507
Bambara	544	Mandarin	97
Belorussian	779	Mandingo or Mandinka	739
Bengali	706	Marathi	714
Bulgarian	707	Mirpuri	533
Burmese	708	Mongolian	790
Cambodian	991	Navajo	549
Cantonese	93	Ndebele	521
Catalan	506	Nepali	741
Cebuano	768	Norwegian	742
Chaldean	503	Oromo	796
Creole (Haitian)	780	Pahari	524
Czech	710	Pashto	98
Danish	711	Polish	5
Dinka	748	Portuguese	996
Dutch	713	Pothwari	523
Egyptian	538	Pulaar	746
Estonian	783	Punjabi, Eastern	749
Fanti	509	Romanian	750
Farsi, Eastern	712	Russian	997
Farsi, Western	94	Rwanda	519
Finnish	716	Serbo-Croatian	752
Flemish	501	Sinhala	754
French	95	Slovakian	755
French Canadian	511	Slovenian	756
Fukienese	715	Somali	757
Fulani	745	Soninke	536
Fuzhou	546	Sorani (Kurdi)	730
Georgian	784	Spanish	1
German	4	Sudanese	542
Greek	993	Swahili (Tanzania & Kenya)	998
Gujarati	738	Swedish	761
Hakka	513	Sylheti	526
Hausa	721	Tagalog	762
Hebrew	722	Taiwanese	763
Hindi	994	Telegu	532
Hmong	744	Thai	992
Hungarian	724	Thmne	527
Ibo or Igbo	759	Tibetan	798
Icelandic	725	Tigrinya	773
Ilocano	726	Tongan	792
Indonesian	727	Trukese	740
Iraqi	539	Turkish	764
Italian	995	Twi	709
Japanese	96	Ukrainian	765
Javanese	540	Urdu	999
Karen	548	Uzbek or Uzbeki	793
Kazakh	786	Vietnamese	2
Kirghiz	787	Welsh	531
Kirundi	537	Wolof	747
Korean	3	Xhosa	769
Krio	720	Yoruba	794
Kurdish Bandinani	731	Zulu	770
Kurmanji	520		



Use this chart to phonetically say **Please Hold** or **One Moment, Please** when you need to place a Limited English Proficient caller on hold to access an interpreter.

English	Please Hold	One Moment, Please
Arabic	Arjoo alintithar	Lahtha min fadlek
Armenian	Khntroom enk spasel	Mi rope
Chinese	Qǐng bié guà jī	Qǐng nín shāo děng
Farsi	Lotfan gooshee	Yek Lahzeh lotfan
French	Vuyeh pahsyontay	Uhng momeng sil voo play
German	Bit-tuh lay-gen zee niht owf	Bit-tuh hah-ben zee einen moment ge-doold
Italian	Attay nday ray pray-goh	Uhn moh may ntoh pray-goh
Japanese	Omachiqudasai	Sukoshi omachiqudasai
Khmer	Sōm cham bontèk	Sōm cham mūy plait
Korean	Jam kkan man yo	Jam si man yo
Mandarin	Qǐng bié guà jī	Qǐng nín shāo děng
Portuguese	Por fahvorh, ahguahrdee	Oong momentu por fahvorh
Russian	Po-zha-lui-sta po-do-zhdi-te	Ad-nu mi-nut-ku
Spanish	Ace-pay-rae poor-fah-vohr	Oon moe-main-toe poor-fah-vohr
Vietnamese	Sin zu may	Doi mot Lat

VI. Composition of Boards and Councils

The only ongoing committee which is convened by the Vermont Agency of Transportation is the Public Transit Advisory Committee. This committee consists of representatives from the transit providers, various State agencies (such as Human Services and Community Development), regional planning commissions, private bus companies, and the legislature. This committee is currently 100% Caucasian.

All of the boards of directors of the subrecipient transit providers are also 100% Caucasian. They do include representation from members of the disability community, and advocates for economic development and programs for low income people. The lack of racial diversity on the boards is not unexpected given that Vermont as a whole is 95.3% Caucasian.

VTrans and all subrecipients encourage members of the minority community to join their boards.

VII. Monitoring of Compliance by Subrecipients

An essential responsibility of VTrans as the direct recipient of FTA funds is to monitor the compliance of its subrecipients, the nine transit providers. The governing document of VTrans' oversight is its State Management Plan. The section of the SMP regarding Title VI is reproduced below:

Title VI Program Requirements

Each transportation provider must sign an assurance that they will not discriminate on the grounds of race, color or national origin, exclude from participation in, deny the benefits of, or subject to discrimination any person within the program or activity receiving federal financial assistance.

This assurance is found in the 49 U.S.C. 5310 and 49 U.S.C. 5311 application and is part of the signed agreement between VTrans and the transportation provider.

VTrans requires all applicants and/or subrecipients to provide information as described in FTA Circular 4702.1A. In addition to requirements outlined in the circular, subrecipient must report to VTrans on compliance at least once every three years of operation.

The table below lists the dates of the most recent management reviews for each of the providers and the date of the next scheduled review. Many providers will have reviews during 2014. Updates of the transit providers' Title VI Programs will coincide with their management reviews if they have not separately filed programs within the past two years. It also shows that none of the providers were found to be in violation of Title VI provisions, and that none had open Title VI complaints pending.

Sub-Recipient Name	Date of management review	Significant minority populations present? Y/N	Location of services and facilities, non-discriminatory? Y/N	Civil Rights Discrimination complaints since last review?	Next scheduled review
CRT	10/20/11	N	Y	No	9/5/14
ACTR	3/13/12	N	Y	Yes (Closed)	2015
GMTA	11/29/11	N	Y	No	Oct. 2014
MVRTD	2/24/14	N	Y	No	2017
Castleton Community Seniors (sub of MVRTD)	5/19/14	N	Y	No	2017
RCT	3/8/12	N	Y	No	2015
STSI	2/6/12	N	Y	No	2015
DVTA	12/7/09	N	Y	No	Oct. 2014
Advance Transit	1/16/14	N	Y	No	2017
GMCN	3/3/11	N	Y	No	2014

In addition to the regular periodic reviews, VTrans staff frequently attends meetings of transit providers. The table below shows some of the meetings attended over the past two years.

Activity	Date	Means/Location	Provider
Attend / Observe Board meeting	6/12/13	site visit/Middlebury	ACTR
Bus Inspection	1/10/13	Berlin	GMTA
Met w/ ED and Ops Manager	1/18/13	St. Johnsbury	RCT
Attended Board Meeting	2/11/13	Morrisville	RCT
E&D Partners' Meeting	3/6/13	Randolph	STSI
Attended Board Meeting	3/25/13	Wilder	AT
Financial Review	5/6-8/13	St. Johnsbury	RCT
Attended Board Meeting	6/27/13	Randolph	STSI
Attended TAC Meeting for STSI	7/11/13	Norwich	STSI
Met with Ops Manager	8/6/13	St. Johnsbury	RCT
Attend / Observe Board meeting	8/9/13	site visit/Middlebury	ACTR
Attended Board Meeting	9/26/13	Wilder	AT
Attend / Observe Board meeting	10/11/13	site visit/Middlebury	ACTR
Attend / Observe Board meeting	10/15/13	site visit/Middlebury	CCTA/GMTA
Attend / Observe Board meeting	10/21/13	site visit/Rutland	MVRTD
E&D Partners' Meeting	11/6/13	St. Johnsbury	RCT
Met with members of both boards	11/22/13	Randolph	STSI
Attended Drug & Alcohol Training	12/2/13	Wilder	AT
Attended Board Meeting	12/12/13	Randolph	STSI
Attended ACTR Board Mtg. w/ STSI Bd.	12/13/13	Middlebury	STSI
Met with ACTR Board re: STSI	1/10/14	Middlebury	STSI
Met with ACTR E.D./Attended Board	1/23/14	Randolph	STSI
Attend / Observe Board meeting	1/27/14	site visit/Rutland	MVRTD
Attended Board Meeting	1/30/14	Wilder	AT
Attended E&D Partner's Meeting	2/4/14	Randolph	STSI
Attend / Observe Board meeting	2/14/14	site visit/Middlebury	ACTR
Attend Board / Management Review	2/24/14	site visit/Rutland	MVRTD
Attended Board Meeting	2/26/14	Randolph	STSI
Attended Board Training	2/27/14	Wilder	AT
Attended E&D Partners' Meeting	3/13/14	St. Johnsbury	RCT
Attend / Observe Board meeting	3/14/14	site visit/Middlebury	ACTR
Met with ACTR E. D. & Board Members	3/19/14	Randolph	STSI
Attended Board Fin. Committee Mtg	3/24/14	Randolph	STSI
Attended Board Meeting	3/27/14	Wilder	AT
Attended Board Meeting	4/9/14	Randolph	STSI
Attended Board Meeting	4/17/14	Lyndonville	RCT
Attend / Observe Board meeting	4/21/14	site visit/Rutland	MVRTD
Attended Annual Meeting	4/24/14	Randolph	STSI
Attend / Observe Board meeting	5/19/14	site visit/Rutland	MVRTD
Attended Board Fin. Committee Mtg	5/19/14	Randolph	STSI

On the next four pages are the results of selected management reviews undertaken over the past two years. These reviews cover three providers in the southern part of the state and Advance Transit which serves two towns in Vermont and a larger area in New Hampshire. The responses reflect the fact that the minority populations in the service areas of these providers are very low.

Castleton Community Seniors – May 19, 2014
TITLE VI – NONDISCRIMINATION IN THE DELIVERY OF SERVICE

1. What is the racial composition of your service area?	Predominately Caucasian	
2. Do you provide service to areas with minority populations? Is it the same level and quality of service that is provided areas without minority populations?	n/a n/a	
3. Please describe the location of transit services and facilities. Have you ensured that decisions on the location of transit services and facilities are made without regard to race, color, creed, national origin, sex, age, or disability?	Main Street Castleton with easy access to village and Rt. 4 to Rutland Yes	
4. Please review the Title VI general reporting information submitted with the last application. List all complaints alleging discrimination in the delivery of service that were reported. Follow up on the status of the complaints. Do the complaints indicate that the grantee may discriminate in the delivery of service?		
Complaint Description	Date Filed	Status
None		
5. Who investigates complaints?	Transportation coordinator	
6. Have any complaints concerning discrimination in the delivery of service been received? If yes:	No	
a) How were the complaints identified and resolved?	N/A	
b) Were complaints reported to VTrans? How long after receipt of the complaint?	N/A	
7. How are individuals provided opportunities to participate in the transit planning and decision-making processes without regard to race, color, creed, national origin, sex, age, disability, or marital status? (This includes all applicable regulations.)	Open and frequent contact between passengers and staff.	
8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.	No	
9. How do you promote your service to minority populations?	We promote the service as open and available to all elderly and disabled in our monthly Newsletter.	
10. Do you provide equal service to passengers with mobility devices no larger than a wheelchair? (This is a newly added question in response to a recent comment from the FTA)	Yes	

Marble Valley Regional Transit District – February 24, 2014
TITLE VI – NONDISCRIMINATION IN THE DELIVERY OF SERVICE

1. What is the racial composition of your service area?	Predominately Caucasian	
2. Do you provide service to areas with minority populations? Is it the same level and quality of service that is provided areas without minority populations?	No, service area does not have grouping of minority populations, what little exists is dispersed throughout. n/a	
3. Please describe the location of transit services and facilities. Have you ensured that decisions on the location of transit services and facilities are made without regard to race, color, creed, national origin, sex, age, or disability?	158 Spruce Street: main office and maintenance 80 West Street: Marble Valley Regional Transit Center yes	
4. Please review the Title VI general reporting information submitted with the last application. List all complaints alleging discrimination in the delivery of service that were reported. Follow up on the status of the complaints. Do the complaints indicate that the grantee may discriminate in the delivery of service? No		
Complaint Description	Date Filed	Status
N/A		
5. Who investigates complaints?	Executive Director & Operations Manager	
6. Have any complaints concerning discrimination in the delivery of service been received? If yes:	no	
c) How were the complaints identified and resolved?	n/a	
d) Were complaints reported to VTrans? How long after receipt of the complaint?	n/a	
7. How are individuals provided opportunities to participate in the transit planning and decision-making processes without regard to race, color, creed, national origin, sex, age, disability, or marital status?	Public notices, all public included including minorities, etc. Same opportunity given to entire communities served	
8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.	no	
9. How do you promote your service to minority populations?	Promotion to all public, including minority populations	
10. Do you provide equal service to passengers with mobility devices no larger than a wheelchair? (This is a newly added question in response to a recent comment from the FTA)	Yes	

Advance Transit – January 16, 2014

TITLE VI – NONDISCRIMINATION IN THE DELIVERY OF SERVICE

1. What is the racial composition of your service area?	There are no concentrations of minority populations in the service area.	
2. Do you provide service to areas with minority populations? Is it the same level and quality of service that is provided areas without minority populations?	N/A	
3. Please describe the location of transit services and facilities. Have you ensured that decisions on the location of transit services and facilities are made without regard to race, color, creed, national origin, sex, age, or disability?	See schedule brochure and map. Transit services are provided in the most densely populated areas with equal access to all riders.	
4. Please review the Title VI general reporting information submitted with the last application. List all complaints alleging discrimination in the delivery of service that were reported. Follow up on the status of the complaints. Do the complaints indicate that the grantee may discriminate in the delivery of service? No		
Complaint Description	Date Filed	Status
None		
5. Who investigates complaints?	Executive Director and Board of Directors	
6. Have any complaints concerning discrimination in the delivery of service been received? If yes:	No	
e) How were the complaints identified and resolved?		
f) Were complaints reported to VTrans? How long after receipt of the complaint?		
7. How are individuals provided opportunities to participate in the transit planning and decision-making processes without regard to race, color, creed, national origin, sex, age, disability, or marital status?	Open public meetings and workshops.	
8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.	No	
9. How do you promote your service to minority populations?	There are no concentrations of minority populations in the service area.	

VIII. Statewide Planning Process Compliance

Title VI and the executive order on Environmental Justice prohibit discrimination on the basis of race, color and national origin and direct transportation agencies to avoid system investments that would impose “disproportionately high and adverse effects” on minority or low-income communities. In order to determine how well VTrans and its subrecipients are complying with these requirements, it is necessary to determine the locations of the individuals who are covered by these mandates.

A. Demographic Profile

Minorities

Using the most recent available data, the series of maps on the following pages was produced. The first pair of maps show the locations of minority persons, defined as those identifying themselves as something other than “white alone” in the 2008-2012 American Community Survey. The first map shows the absolute number of minorities by town, and the second map shows those towns where the percentage of minority residents exceeds the statewide average. On this second map, only towns with at least 50 minority individuals are included.

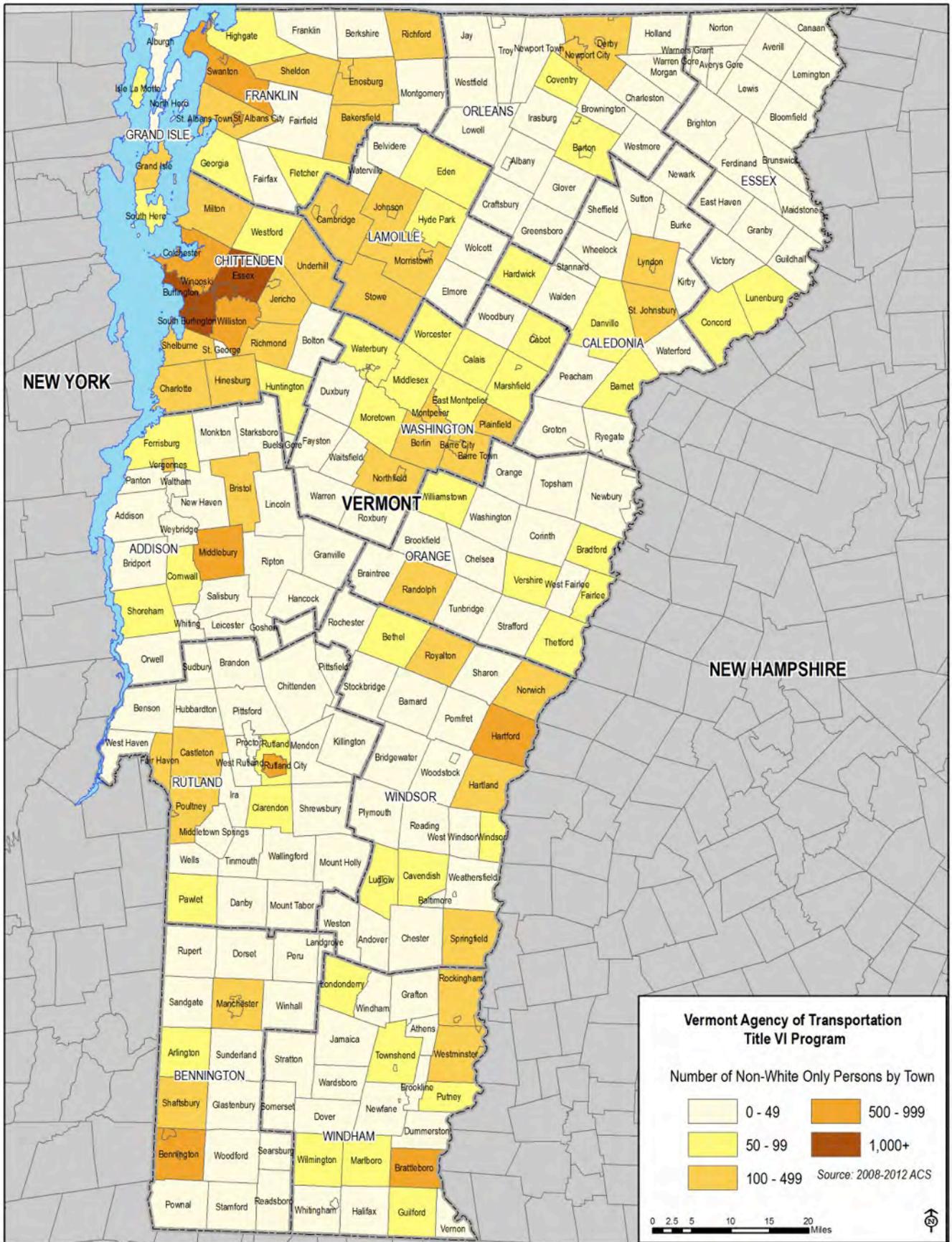
The municipalities with the greatest number of minorities are all within the core of Chittenden County: Burlington, South Burlington, and Essex. The next tier of towns, with between 500 and 1,000 minority individuals include other Chittenden County communities (Winooski, Williston and Colchester) as well as some of the more populated cities and towns across the state: Rutland, Bennington, Brattleboro, Middlebury, St. Albans, Swanton, and Hartford (White River Junction). The final tier with significant number of minorities (greater than 100) are in the Connecticut River Valley, the northwestern sector of the state, and other towns with significant population scattered across the rest of the state.

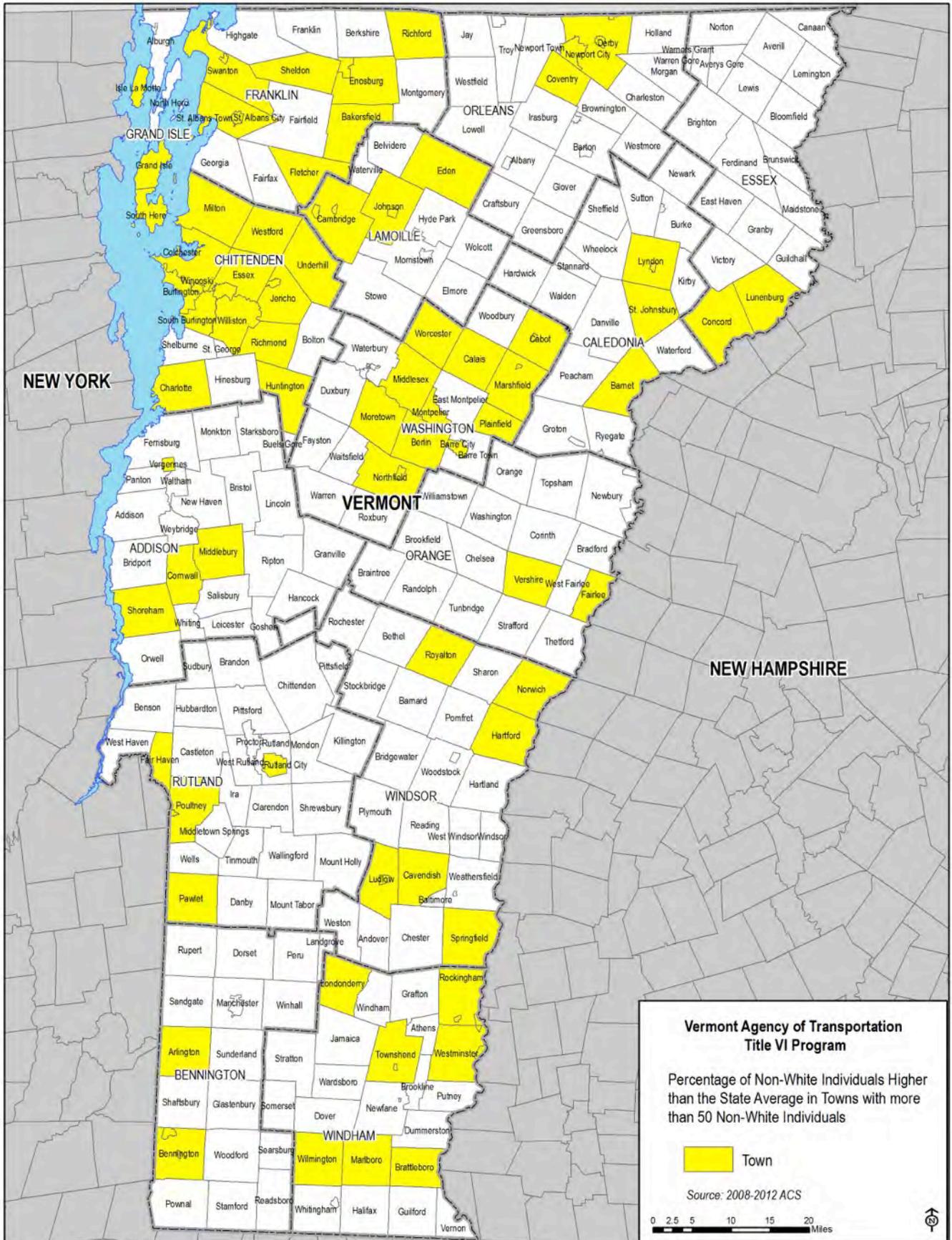
The concentrations of minority persons in significant numbers can mainly be found in the northwestern portion of Vermont, including the core of Chittenden County and much of Franklin County, most of Washington County, and along the Connecticut River Valley from Brattleboro through Norwich.

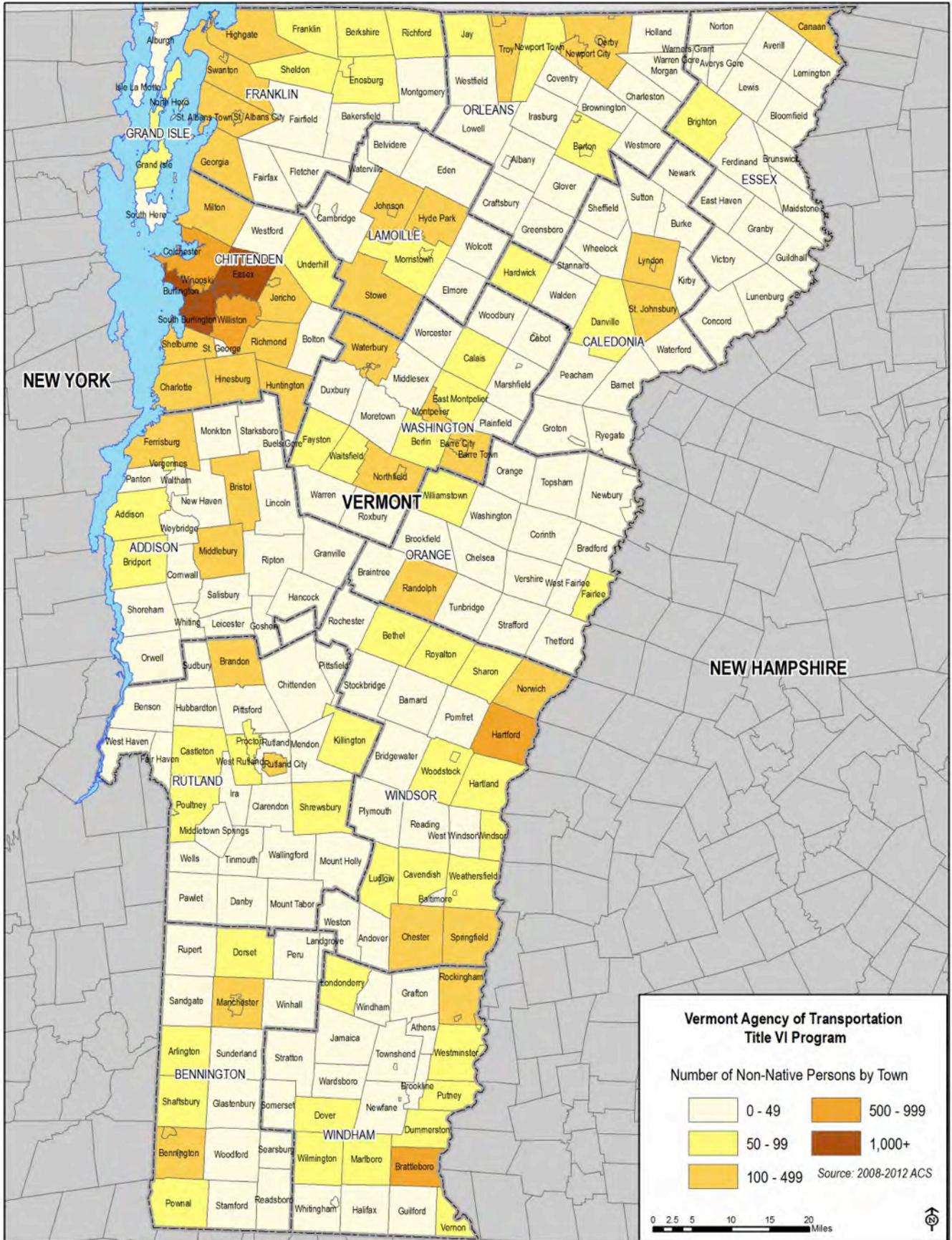
Non-American National Origin

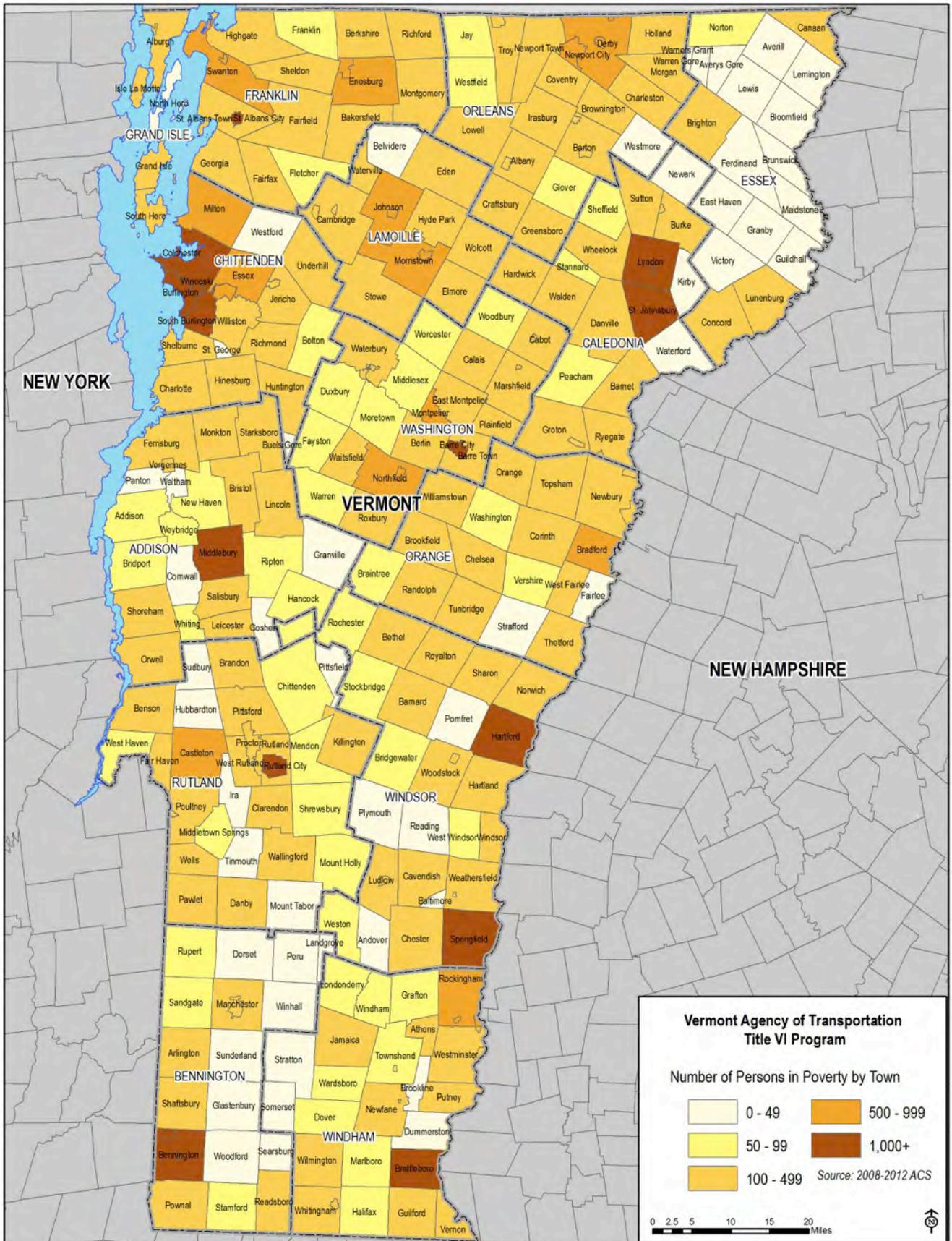
The two maps representing data on the national origin of Vermont residents are similar in many ways to the maps of minorities. The core of Chittenden County again has the highest totals and the whole northwestern sector has higher numbers than most of the rest of the state. The Connecticut River Valley also has several towns in the upper categories. Towns along the Canadian border show up more prominently in this map than the minorities map, reflecting a higher representation of French Canadians.

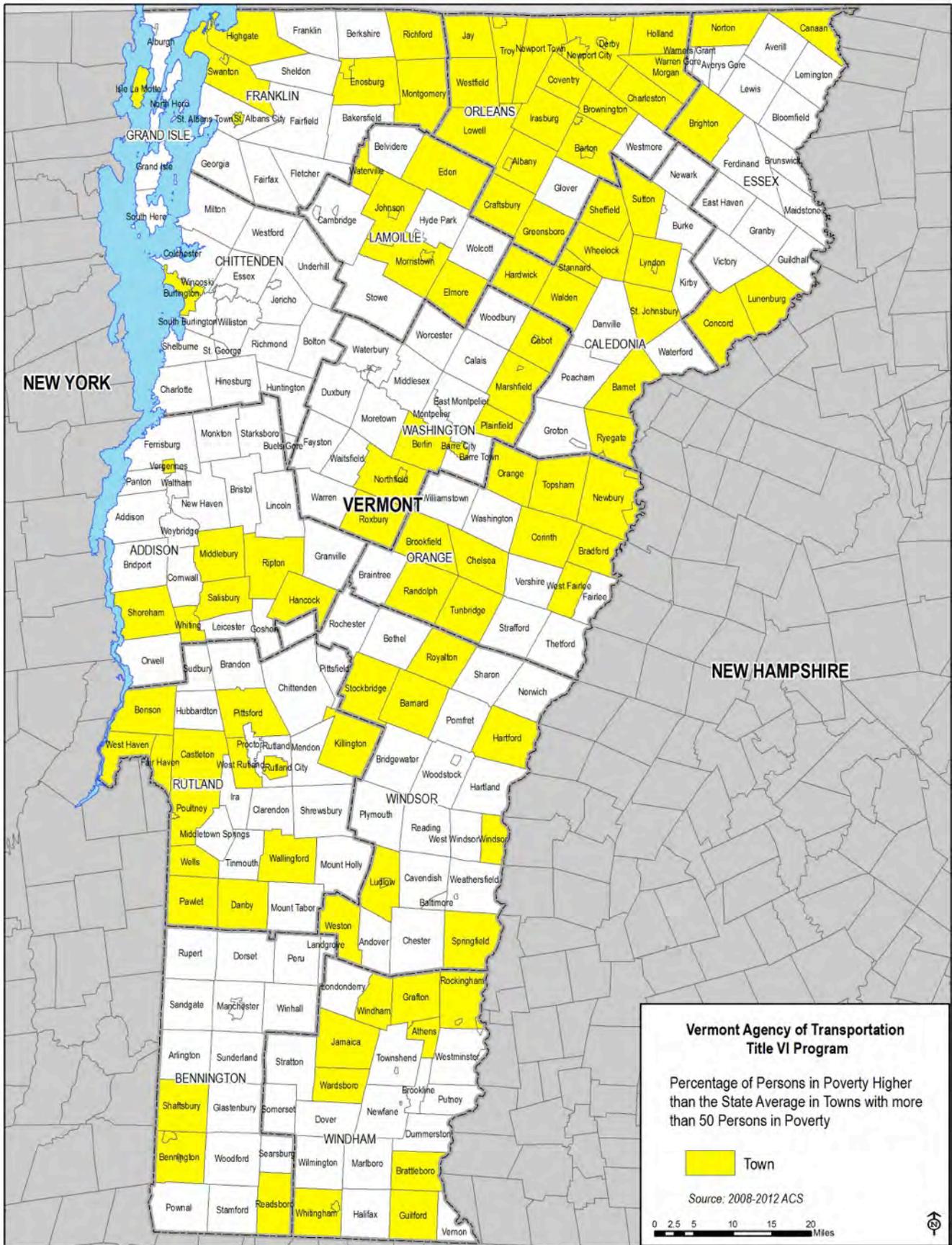
The map of concentrations of non-American born residents shows many of these Canadian border towns with percentages higher than the state average, though most of these towns are sparsely populated. All of the municipalities in the core of Chittenden County have concentrations of non-natives, due mainly to the Vermont Refugee Resettlement Program (see section on LEP for more discussion). There are relatively few towns in the southern half of the state with concentrations of non-natives, other than clusters around Manchester, Brattleboro and Hartford.











Low Income

As a rural state without a large base of high-paying jobs—outside of Chittenden County—poverty is much more widespread in Vermont than any of the other factors considered in the Title VI program. In the 2008-2012 American Community Survey data, some 69,411 people are estimated to be in households that have incomes below the federal poverty threshold. (In dollar terms, that threshold varies by household size.) This number represents about 11.6% of the population for whom it is possible to determine poverty status (600,711). In comparison, less than 1.5% of residents are not able to speak English very well, 4.7% of residents are minorities, and 4.0% of residents were not born in the United States.

The analogous maps of low-income individuals shows many of the same patterns as seen in the previous maps, though many more towns fall into the higher categories. The City of Burlington has the highest number, more than three times the next closest city, but much of this is likely due to the many college students residing in the city. The next five highest totals after Burlington, though, are not in Chittenden County, but rather spread out among some of the older industrial towns such as Rutland, Brattleboro, and Barre. Bennington and Middlebury also have high numbers, but this is likely due to the presence of many college students, similar to Burlington. Of course, other communities in Chittenden County also have high numbers of people in poverty, due to their relatively high populations.

In spite of the high numbers in the communities surrounding Burlington, the percentages of people in poverty in most of these communities is below the state average. As mentioned above, Chittenden County offers the highest concentration of well-paid jobs in the state due to the presence of large employers such as the University of Vermont, Fletcher Allen Health Care, IBM, State agencies, and many financial institutions.

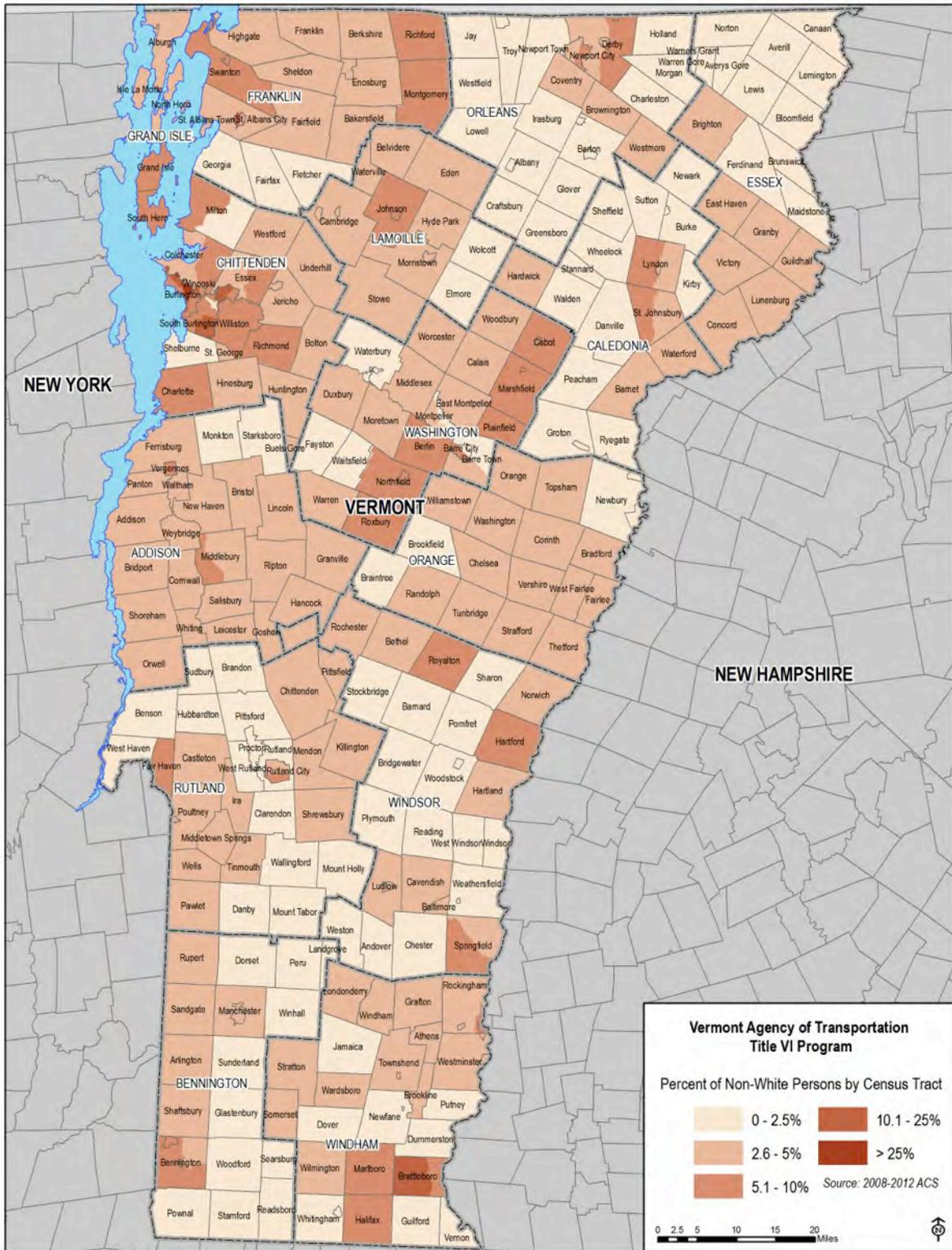
Other than Chittenden County, though, the northern half of the state, particularly the Northeast Kingdom, exhibits greater concentrations of people in poverty than the southern counties. Windham and Bennington counties have a total of 12 towns with concentrations of poverty combined, while Essex, Caledonia and Orleans counties have 32 such towns between them. Orleans County has the greatest total of towns with concentrations of poverty, with 17.

B. Funding Distribution Analysis

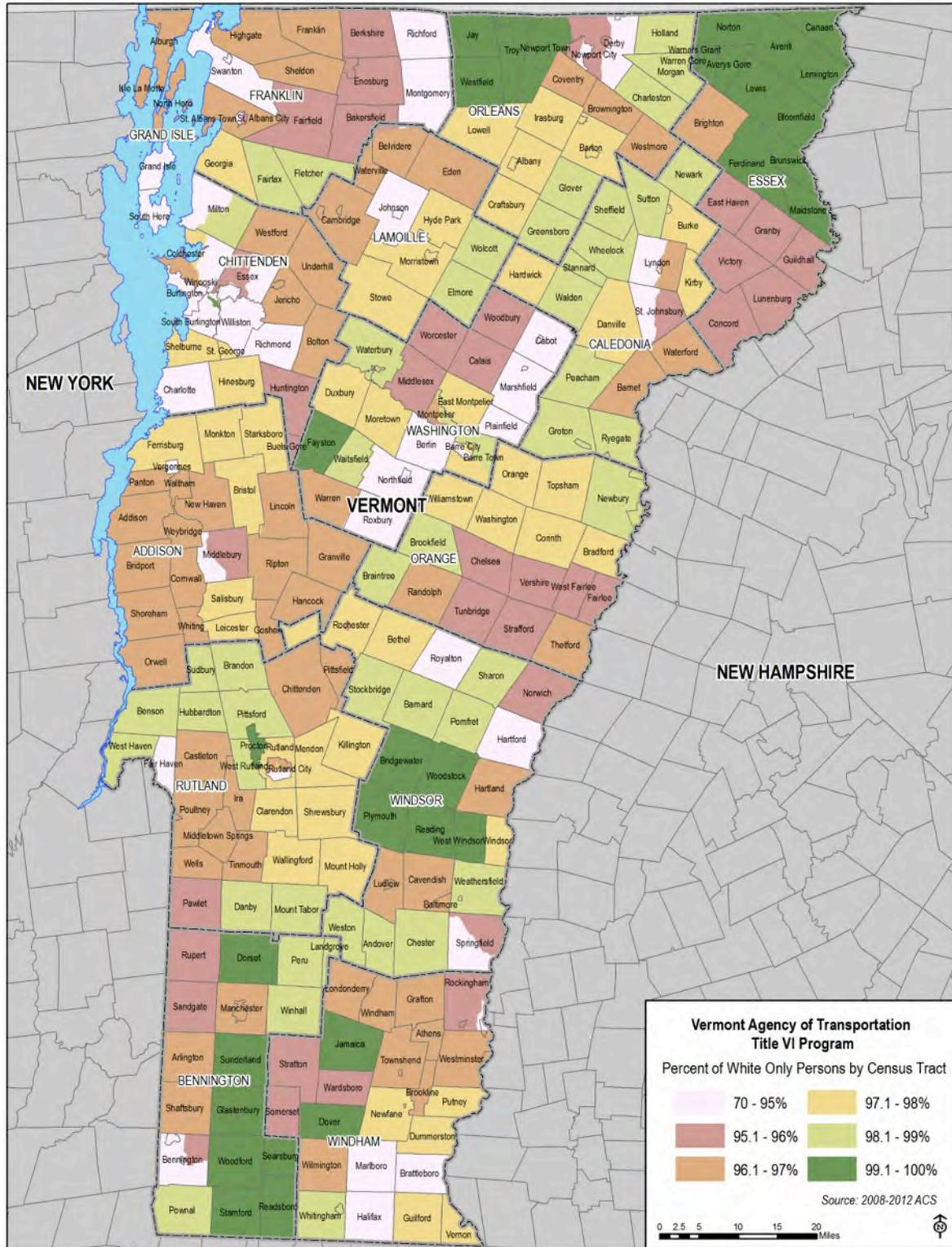
Maps on the next two pages display the percentages of the minority population and the white-only population by Census tract. In Vermont, Census tracts in rural areas can encompass whole towns or even groups of towns. In the more populated cities and towns, the minor civil divisions are broken into several different tracts.

For the purpose of this analysis, funding for bus operations was separated from funding for demand response service. The service area of a bus route is reasonably well-defined, but demand response service essentially covers the entire state. From the perspective of a given transit provider, bus route operations funding covers the area within a 3/4-mile buffer of its bus routes (since most providers in Vermont operate route deviation service with that much of a buffer around the defined route). Demand response funding covers the entire county or multi-county region they serve.

The maps include an overlay of the service area of the bus routes operated by transit providers in Vermont. It is important to note that several routes are operated jointly by neighboring providers. In order to avoid double-counting, the service area was typically split at the county boundary.



Note: map to be updated with overlay of bus service areas.



Note: map to be updated with overlay of bus service areas.

Vermont overall is overwhelming white. According to the 2008-2012 American Community Survey, 95.3% of the statewide population is “white only.” Of the 184 Census tracts in the state, only 9 of them have minority percentages higher than 10%, and 7 of these are in the core of Chittenden County.

The tables below compare the amount of funding for bus operations and for demand responsive services with the minority populations in their respective service areas.

Bus Route Service Area Racial Breakdown and Funding

Agency	Bus Route Service Area Population	White Only	Non White	Percentage White	Percentage Non White	State and Federal Funding
ACTR	17,384	16,512	872	95.0%	5.0%	\$1,074,347
AT	13,366	12,583	783	94.1%	5.9%	\$413,828
CCTA	153,857	141,992	11,865	92.3%	7.7%	\$6,913,783
CRT	45,185	43,088	2,097	95.4%	4.6%	\$1,583,481
DVTA	9,597	9,292	305	96.8%	3.2%	\$1,197,963
GMCN	31,478	30,281	1,197	96.2%	3.8%	\$564,380
GMTA	107,000	102,468	4,532	95.8%	4.2%	\$2,625,210
MVRTD	48,371	47,059	1,312	97.3%	2.7%	\$3,120,779
RCT	25,049	23,829	1,220	95.1%	4.9%	\$395,058
STSI	24,079	23,317	762	96.8%	3.2%	\$862,374
None	150,132	145,830	4,302	97.1%	2.9%	

Demand Response Service Area Racial Breakdown and Funding

Agency	DR Service Area Population	White Only	Non White	Percentage White	Percentage Non White	State and Federal Funding
ACTR	36,814	35,217	1,597	95.7%	4.3%	\$152,695
CCTA	156,696	144,836	11,860	92.4%	7.6%	\$1,320,296
CRT	63,714	61,030	2,684	95.8%	4.2%	\$261,749
DVTA	6,528	6,346	182	97.2%	2.8%	\$106,127
GMCN	36,990	35,700	1,290	96.5%	3.5%	\$139,140
GMTA	119,866	114,972	4,894	95.9%	4.1%	\$906,752
MVRTD	61,599	59,763	1,836	97.0%	3.0%	\$189,566
RCT	89,155	86,232	2,923	96.7%	3.3%	\$719,441
STSI	54,136	52,155	1,981	96.3%	3.7%	\$365,626

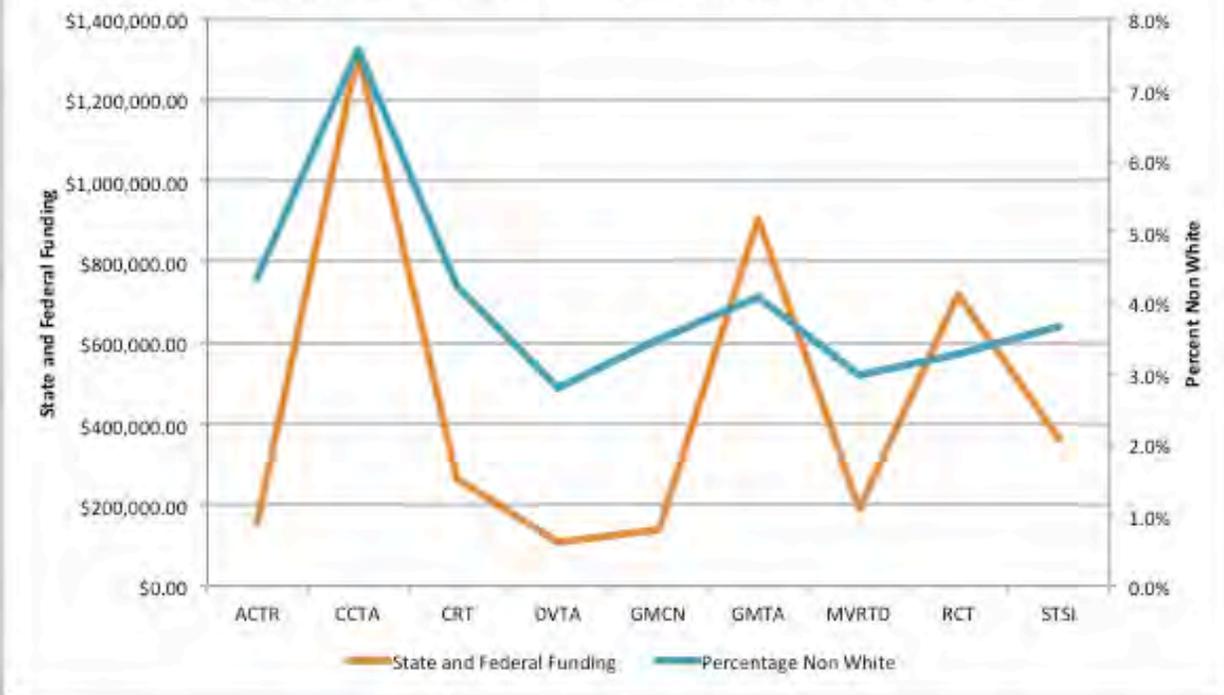
Note: Advance Transit (AT) does not operate demand response service in Vermont other than ADA paratransit

The data in the tables above is presented in chart format on the next page.

Bus Route Funding vs. Minority Percentage



Demand Response Funding vs. Minority Percentage



C. Disparate Impacts Analysis

The first thing to notice about the figures in the tables and charts is that the percentages of non-white population vary very little across the service areas of the various providers. Among the bus route service areas, the non-white percentage ranges from 2.7% to 7.7% and among the demand response service areas, the range is from 3.0% to 7.6%. Compared to other areas of the country, that range represents hardly any variation at all. Given the lack of variation, it would be difficult to identify any disparate impacts of funding decisions based on race, color, or national origin even if they existed.

However, examining the charts on the previous page, the funding distribution by provider in general lines up very well with distribution of minority individuals across the state. With respect to bus route funding, the State and Federal dollars distributed are higher for those providers with higher percentages of non-white residents and lower for those with lower percentages. The exceptions are Advance Transit, Marble Valley Regional Transit District and Rural Community Transportation. For AT and RCT, the funding for bus routes is lower compared to the other providers, and the reverse is true for MVRTD. Advance Transit receives relatively little funding from Vermont, as most of its service area is in New Hampshire. RCT serves a very rural area and thus receives most of its funding for demand response service, as it operates only two low-service local routes and half of a commuter route (jointly with GMTA). (It can be seen that RCT's demand response service funding is greater compared to the minority population in the second graph). MVRTD serves the relatively populous area of Rutland, and thus receives the second highest funding amount in the state (after CCTA), but the Rutland area, for various historical reasons, has one of the lowest minority percentages in the state.

With respect to demand response service, the results for funding and minority percentage also line up very well, except for RCT. As mentioned above RCT has relatively more DR funding because of the overwhelmingly rural development pattern in its service area.

One final note is that the portion of the state with no bus route service ("None" in the first table and chart) has nearly the lowest percentage of minority individuals among all of the service areas. Only the Rutland area has a lower percentage of minorities. The fact that the area with no bus service has among the lowest percentages of minorities is further evidence that there are no disparate impacts based on race, color, or national origin.

The conclusion of this analysis, based on the fact that there is very little variation in the percentage of minorities across the different service areas in Vermont, and when there is variation, the areas with the higher percentages of minorities generally receive greater funding, is that there are no disparate impacts of funding decisions with respect to race, color, or national origin.

D. Planning Process

VTrans staff engages in several statewide planning efforts related to public transportation on a regular cycle. These include the following:

- Long Range Transportation Business Plan
- Public Transit Policy Plan (PTPP)
- Short Range Transit Plans
- Human Service Transportation Coordination Plan

The PTPP (http://www.aot.state.vt.us/publictransit/documents/PTPP/AOT-OPS-PT_PTPP_FullReport.pdf) includes extensive analysis on the needs of low-income populations including Medicaid recipients, minorities, and families below the poverty line. The intent of this analysis is to inform statewide policies on transportation provision and funding and serve as the backdrop to service planning and analysis that takes place in the Short Range Transit Plans and internal planning efforts on the part of the transit providers.

In all of these statewide planning efforts, it is VTrans policy to conduct them in a non-discriminatory way. The public involvement components of these efforts is inclusive and participation from groups protected under Title VI and Environmental Justice is strongly encouraged (see section IV for more discussion). Meeting locations, facilities, and times are set so that they are maximally accessible by members of protected groups.

Another important component of the statewide planning process is called the Transportation Planning Initiative, or TPI, through which VTrans planning staff works with transportation planners from the regional planning commissions and the metropolitan planning organization. The TPI is a State initiative that is designed to include all segments of the public in planning the improvements to Vermont's transportation system. The goal is to expand local decision making and planning of transportation priorities, projects and long range plans. The TPI is discussed more below in subsection F.

With respect to the benefits and burdens of the FTA investments in Vermont, these investments are mapped against the locations by census block for residents with disabilities; residents over 65; low income residents mapped multiple ways including poverty line, auto less households, and Medicaid residents; jobs availability; and minority populations. This analysis, conducted periodically by VTrans as part of its oversight process, demonstrates the effort to specifically target those populations and focus programmatic transportation efforts on better meeting the needs of minority, low-income, and disabled populations. The next section on financial assistance discusses in greater detail the efforts to ensure that the needs of protected groups are met.

E. Pass-Through of FTA Financial Assistance

The majority of FTA funding that passes through VTrans to its subrecipients consists of 5311 non-urbanized area funding and 5310 elders and persons with disabilities funding. The following language is an excerpt from the VTrans State Management Plan detailing the manner in which projects are selected for VTrans funding:

C. Project Selection Criteria and Method for Distributing Funds Section 5310

Program - Subsequent to FTA program allocation notification, program announcements are placed in all major newspapers in Vermont and, through a direct mailing list, are maintained by the Public Transit Section. Formal applications are distributed through direct mail and e-mail upon request annually. Upon formal application submittal, the Public Transit Section staff reviews, screens and ranks the formal applications on content. The Public Transit Section staff ranks the formal applications on "need". The federal funding received by Vermont determines how many of the highest ranked applicants are approved for funding. VTrans maintains a file for each grant year that contains a list of approved and rejected applicants. This list also identifies which applicants are minorities or provide service to minorities.

VTrans interpretation of need has to do with various indicators of transit dependency and the lack of mobility including income, race, and automobile ownership. VTrans tracks the requests for funding from the nine transit providers in Vermont and ensures over time that these funds are distributed fairly with respect to protected groups.

Over the past few years, VTrans has allocated its entire funding under the JARC program to CCTA. As the only urban area in the state, and the area with the greatest number of and highest concentration of minority residents as well as thousands of low-income residents, the Burlington region was the best destination for JARC funding. This money has been used to fund service to a fast-growing area in Williston that formerly had no transit access.

VTrans oversees a competitive grant process for New Services projects, funded by the federal Congestion Mitigation/Air Quality program. In this occasional process (depending on the availability of such funds from year to year), VTrans has twenty criteria. Although none of these specifically state service to minority or low-income communities, applicants must identify the intended market or need being addressed by the proposed service and demonstrating how it relates to state public transportation goals. By statute, the most important goal of public transportation in Vermont is “provision for basic mobility for transit-dependent persons” which is targeted directly at groups protected under Title VI and Environmental Justice.

On a routine basis, the grant agreements signed by VTrans and the transit providers govern most of the FTA money that passes through VTrans. These grant agreements contain specific language regarding Title VI, as shown below:

1. Title VI - Civil Rights Act of 1964:

1. Subrecipient agrees for itself, its assignees, and successors in interest (hereinafter collectively referred to as Subrecipient) that Subrecipient shall comply with the regulations governing nondiscrimination in Federally-assisted programs of DOT, as set forth in 49 CFR, Part 21, as they may be amended from time to time and hereinafter referred to as Regulations. Regulations are hereby incorporated by reference and made a part of this Agreement. Subrecipient shall not discriminate on the grounds of race, color, or national origin in selecting and retaining subcontractors, including procurements of materials and leases of equipment.
2. Subrecipient shall not participate, either directly or indirectly, in discrimination prohibited by Section 21.5 of the Regulations, including employment practices, when the Agreement covers a program set forth in Appendix B of the Regulations.
3. In all solicitations, either by competitive bidding or negotiation, made by Subrecipient for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by Subrecipient of Subrecipient’s obligations under this Agreement and the Regulations relative to nondiscrimination on the grounds of race, color, or national origin.
4. Subrecipient shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its accounts, books, records, other sources of information, and its facilities as may be determined by the State or the Federal Government to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of Subrecipient is in the exclusive possession of another who fails or refuses to furnish this information, Subrecipient shall so certify to the State or the Federal Government as appropriate, and shall set forth what

efforts it has made to obtain the information.

5. In the event of Subrecipient's noncompliance with the nondiscrimination provision of this Agreement, State shall impose such contract sanctions as it or the Federal Government may determine to be appropriate, including, but not limited to withholding of payments to Subrecipient under the Agreement until Subrecipient complies, and/or, cancellation, termination or suspension of the Agreement, in whole or in part.
6. Subrecipient shall include the provisions of these paragraphs 35.1) through 35.6) in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. Subrecipient shall take such action with respect to any subcontract or procurement as State or the Federal Government may direct as a means of enforcing such provisions including sanctions for noncompliance; provided, however, that, in the event Subrecipient becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, Subrecipient may request State to enter into such litigation to protect the interests of State, and, in addition, Subrecipient may request the Federal Government to enter into such litigation to protect the interests of the Federal Government.
7. Subrecipient shall comply with the applicable provisions of Executive Order 11246 of September 24, 1965, Title VI of the Civil Rights Act of 1964, and the rules, regulations, and relevant orders of the Secretary of Transportation and the Secretary of Labor. In the event of Subrecipient's non-compliance with the nondiscrimination clauses of the Agreement or with any of the rules, regulations or orders, this Agreement may be canceled, terminated or suspended, in whole or in part, and Subrecipient may be declared ineligible for further Federally-assisted contracts, or State-assisted contracts, in accordance with procedures authorized in Executive Order 11246 of September 24, 1965, and such other sanctions may be imposed and remedies invoked as provided in Executive Order 11246 of September 24, 1965, or by rule, regulation or order of the Secretary of Labor, or as otherwise provided by law.

Through these stipulations and processes of passing financial assistance through to subrecipients, VTrans ensures that FTA are allocated among subrecipients in a non-discriminatory way, and then are used by those subrecipients in a non-discriminatory way as well.

F. Providing Assistance

VTrans provides assistance to subrecipients related to Title VI in a number of ways. It provides training on Title VI regulations and materials to help subrecipients fulfill their Title VI obligations. VTrans also designates Title VI liaisons to maintain ongoing communication about Title VI issues.

VTrans occasionally makes funds available to its subrecipients for planning studies or technical assistance. Requests from subrecipients for assistance related to Title VI and Environmental Justice population segments receive special consideration from VTrans.

The following describes various assistance and training activities that VTrans has pursued over the past two years:

- **Title VI Desk Audit:** A Title VI desk audit and program review of the CCRPC was conducted in July, 2012.

Results of the review included the following Title VI Program improvements:

- An updated Public Participation Plan
 - Provision of Title VI notice language for posting on CCRPC website and all future CCRPC meeting notices
 - Identification of a dedicated Title VI Coordinator
 - Ensuring public meeting sites are accessible to all
 - Notice of interpretive and translation services will be provided during public meetings provided without charge
 - Posting of both the CCRPC Title VI complaint procedure and form on the CCRPC website
 - Updating the Title VI brochure
 - Development of LEP mapping and service area demographic data for inclusion in the CCRPC Title VI Program
 - Listing of public meetings seeking input from all service area residents in the development of the TIP, PPP, and UPWP
- **Transportation Planning Initiative:** VTrans has a consultative planning and public outreach relationship statewide through the Transportation Planning Initiative (TPI). Regional Transportation Planning Coordinators carry out the TPI in working partnership with the ten non-metropolitan Regional Planning Commissions (RPCs) of the state and the Chittenden County Regional Planning Commission (CCRPC), Vermont's only Metropolitan Planning Organization. The Coordinators work directly with these regional commissions to solicit local input, identify community needs, hold public meetings, develop regional transportation plans and transportation improvement programs, and provide planning capacity and expertise on an ongoing basis. In addition, the coordinators play a key role in the Agency's public outreach efforts, working collaboratively with the RPCs and other state agencies, VTrans program managers, and an array of public and private organizations to inform the public on important transportation issues, programs, projects, planning activities, and to facilitate the flow of accurate planning information impacting the local population during the planning process.
 - **Program Review Checklist:** During 2013, a Title VI Program review checklist was distributed to the ten RPCs and the CCRPC by VTrans Planning staff. A map of the RPCs is available at the following link: <http://vtransplanning.vermont.gov/planning/regional/rpc> While responses were not received from all of the RPCs throughout the state, the responses did give a good indication of the level of Title VI awareness and activities undertaken, while identifying needs for additional program improvement, monitoring and guidance.
 - **Title VI Training and Dissemination of Information:** In consultation with senior VTrans management, including all VTrans Division Directors and the Commissioner of DMV, the VTrans Title VI Coordinator has identified Title VI training needs and developed and delivered PowerPoint presentations and other training resources to a majority of VTrans staff and Agency sub-recipients to meet those needs. A variety of handouts and a Title VI brochure have been developed and distributed. Basic Title VI

training has also been developed and delivered to staff at the Agency's Public Transit providers. Title VI training was provided and held onsite for the following subrecipient entities:

- 17 staff members of CCRPC (May, 2013)
- TPI coordination meeting held at VTrans (January, 2014), and co-sponsored by the Central Vermont Regional Planning Commission with other RPC representatives attending
- **Review of Contract Language and the Development of Forms for Monitoring and Reporting Title VI Data:** Various forms have been developed and distributed to assist in the collection of Title VI data, including a Title VI Complaint Log, a Title VI Program Review Form and checklist, and a Title VI Quarterly Report. Agency documents, including contracts, publications, and websites have been reviewed to insure the inclusion of all appropriate and necessary language and contract provisions. VTrans continues to develop additional electronic resources, links, and Title VI best practice information on the VTrans Civil Rights website including the USDOT Title VI e-learning tool at: <http://title6overview.com>
- **Designation and Training of VTrans Title VI Liaisons:** Identified and designated 26 new VTrans Title VI Liaisons, tasked with the responsibilities of the continuing collection and reporting of Title VI data and providing Title VI resources for their respective sections, divisions, and/or departments. Title VI training is provided for all of the newly designated VTrans Liaisons, representatives from the various regional planning commissions, transit providers, and other governmental and non-governmental transportation stakeholders.
- **Development of Title VI maps** indicating valuable demographic information depicting concentrations of minority, low income, and ethnically diverse populations within Vermont to help inform the future design, planning, and construction of all VTrans projects;
- **Appointment of a full-time Title VI Program Manager** to oversee all VTrans Title VI program plan and implementation efforts.

In providing technical assistance to its subrecipients, VTrans follows the procedure below to ensure that the process is non-discriminatory:

1. Review prevalence of low-income and minority groups served by each subrecipient
2. Itemize types of assistance available to subrecipients other than financial pass-through assistance including, but not limited to
 - a. Technical assistance with planning studies
 - b. Training on following federal and state regulations
 - c. Training on computer software
 - d. Coordination of public involvement activities
3. Ensure that those subrecipients with concentrations of Title VI and EJ populations receive no less than their fair share of assistance proportional to service area population, and more if possible