



**VERMONT**

**AGENCY OF TRANSPORTATION**

**Federal Transit  
Administration  
Title VI / Environmental  
Justice Program  
2017**

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**Submitted By:  
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**FEDERAL TRANSIT ADMINISTRATION**

**TITLE VI / ENVIRONMENTAL JUSTICE PROGRAM 2017**



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Agency of Transportation

### VTrans Title VI Nondiscrimination Statement

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, 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.

Joe Flynn  
Secretary of Transportation

Date

02/27/2017



## II. Notification of Title VI Protections

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

<http://vtrans.vermont.gov/sites/aot/files/civilrights/documents/titlevi/TitleVINondiscrimStatement.pdf>

This statement is as follows:

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 that 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 802.828.5858. For more information, visit <http://vtrans.vermont.gov/civil-rights/compliance/titlevi>.

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 distribution through the Vermont League of Cities and Towns and the Municipal Assistance Bureau.

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.

### III. 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.

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: 802.828.5858  
Fax: 802.828.1047

Electronic submission of complaints is also permitted. All complaints related to Title VI discrimination should be addressed to Sue Hackney, Title VI Coordinator, at the following address: [susan.hackney@vermont.gov](mailto:susan.hackney@vermont.gov).

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 Office of Civil Rights 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. The VTrans Title VI Coordinator will initiate an internal complaint form.
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 Civil Rights and Labor Compliance Chief 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 Office of Civil Rights identifying the complainant's name, date of incident, alleged harm, and the race, color, or national origin of the complainant.
7. The Title VI Coordinator, assisted by other members of the Office of Civil Rights who are trained in compliance investigations, will initiate an investigation of the complaint 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 Civil Rights and Labor Compliance Chief 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. The complainant will be advised to contact the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Ave SE 5<sup>th</sup> Floor, TRC East Building, Washington, DC 20590. (202) 366-4043.
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 in the Office of Civil Rights and this information will be included as part of the next Title VI update to FTA.

## TITLE VI Complaint Form

**Section I**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (Cell/Home): \_\_\_\_\_ Telephone (Work): \_\_\_\_\_

Email: \_\_\_\_\_

Accessible Format Requirements? Large Print \_\_\_\_\_ Audio Tape \_\_\_\_\_ TDD \_\_\_\_\_

Other (Explain) \_\_\_\_\_

**Section II**

Are you filing this complaint on your own behalf? Yes\* \_\_\_\_\_ No \_\_\_\_\_ *\*If you answered "Yes" to this question, go to Section III. If you answered "No," please provide the following information:*

Name of person for whom you are filing: \_\_\_\_\_

Relationship: \_\_\_\_\_

Please explain why you are filing this complaint for a third party: \_\_\_\_\_

\_\_\_\_\_

If you are filing on behalf of someone else, have you have obtained that person's permission to file this complaint? Yes \_\_\_\_\_ No \_\_\_\_\_

**Section III**

I believe the discrimination I experienced was based on (check all that apply):

Race \_\_\_\_\_ Color \_\_\_\_\_ National Origin \_\_\_\_\_ Date of Alleged Discrimination: \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If you need more space, please attach a separate sheet of paper.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Section IV**

Have you previously filed a Title VI complaint with this agency? Yes \_\_\_\_\_ No \_\_\_\_\_

**Section V**

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? Yes\* \_\_\_\_ No \_\_\_\_

*\*If you answered "Yes," check all that apply:*

Federal Agency \_\_\_\_ Federal Court \_\_\_\_ State Agency \_\_\_\_ State Court \_\_\_\_ Local Agency \_\_\_\_

Please provide information for the contact person at the agency/court where you filed the complaint.

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Agency: \_\_\_\_\_ Agency Telephone: \_\_\_\_\_

Agency Address: \_\_\_\_\_

**Section VI**

Name of Agency complaint is against:

\_\_\_\_\_

Contact person: \_\_\_\_\_ Title: \_\_\_\_\_

Telephone number: \_\_\_\_\_

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Please either submit this form in person to the address below, mail it, or send it via email:**

Sue Hackney, Deputy Chief of Civil Rights  
Vermont Agency of Transportation  
One National Life Drive  
Montpelier, VT 05633

Phone: 802.828.5858

Email: [susan.hackney@vermont.gov](mailto:susan.hackney@vermont.gov)

#### **IV. 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 2014.

## V. 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

**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.

**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 and the Human Service Transportation Coordination Plan. Separate public involvement plans are developed for each of these planning projects in cooperation with contractors who perform the studies.

### **Public Outreach Plan**

VTrans has just completed its comprehensive Public Involvement Guide in June 2017. It is available for review at the following URL:

<http://vtrans.vermont.gov/sites/aot/files/highway/documents/publications/VTransPublicInvolvementGuide2017.pdf>

The Guide has four main sections and 13 appendices:

1. Quick Guide: Outreach by Project Phase
2. Why Does Outreach Matter?
3. Preparing for Outreach
4. Engaging the Public

Chapters 2 and 4 have sections that deal specifically with Title VI-related issues and groups. Section 2.2 lays out the federal laws and regulations that affect outreach, including Title VI and Environmental Justice. This section contains the following statement:

Title VI should be considered throughout the planning, project development, and environmental review process. As with all project development issues, early identification of Title VI concerns increases the likelihood of successful resolution. All VTrans staff should be proactive in identifying and addressing possible Title VI issues, and VTrans Civil Rights specialists should be actively engaged to provide input on areas of potential concern. (p. 17)

Section 4.1 provides specific guidance on preparations for public meetings and states the following:

Ensure that special efforts are made and documented relative to the involvement of minority and low-income communities and that appropriate Title VI language is used in all letters and public notices. Consult with Civil Rights staff for more information. (p. 35)

The document also includes the maps of Title VI-protected groups and linguistically isolated individuals from the last Title VI program (2014). As this guide is disseminated and put into effect, public outreach efforts in the state should become yet more inclusionary and compliant with federal regulations.

**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.

<b>Public Meeting</b>	<b>Date</b>	<b>Location</b>	<b>Title VI Concentration</b>
Public Transit Advisory Council, open to the public	9/18/14	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	12/18/14	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	3/19/15	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	6/18/15	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible

Public Transit Advisory Council, open to the public	9/17/15	Chittenden County Transit, Burlington	Chittenden County, transit accessible
Public Transit Advisory Council, open to the public	12/17/15	GMCN, Bennington	Bennington, transit accessible
Public Transit Advisory Council, open to the public	3/17/16	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	6/16/16	MVRTD, Rutland	Rutland, transit accessible
Public Transit Advisory Council, open to the public	9/15/16	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Amtrak Shuttle Meeting	11/3/16	Bennington RPC	Bennington, transit accessible
Amtrak Shuttle Meeting	11/29/16	Bennington College	Bennington, transit accessible
Public Transit Advisory Council, open to the public	12/15/16	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	3/16/17	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
ACTR/STSI Merger Meeting	4/4/17	Bradford	Bradford, transit accessible
Public Transit Advisory Council, open to the public	6/15/17	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible

In addition to these meetings, VTrans attends monthly meetings of the Vermont Public Transit Association, and the coordinators in the public transit section attend monthly board meetings of all of the subrecipient transit providers.

In 2017 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.

## **VI. Access to Services by Persons with LEP**

### ***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.

### ***A. 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**

According to the 2011-2015 American Community Survey, 8,541 citizens of the state of Vermont ages 5 or older spoke English less than very well, representing 1.43% of the population. The largest language-group among these LEP persons was French with 1,570 LEP individuals, reflecting French-Canadians who are represented in rural areas across the northern tier of Vermont. Spanish speakers were the second largest group, with 1,359 LEP individuals. Many of the Spanish speakers are migrant farmworkers in the rural areas of the state. These groups each represent about 0.25% of the total population. Maps and tables presented on the following pages 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.

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
- Human Service Transportation Coordination Plan

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. For projects located in an area with a higher prevalence of LEP persons—central Chittenden County—VTrans and the CCRPC (if applicable) also work with community organizations representing immigrant populations to encourage participation and facilitate communication.

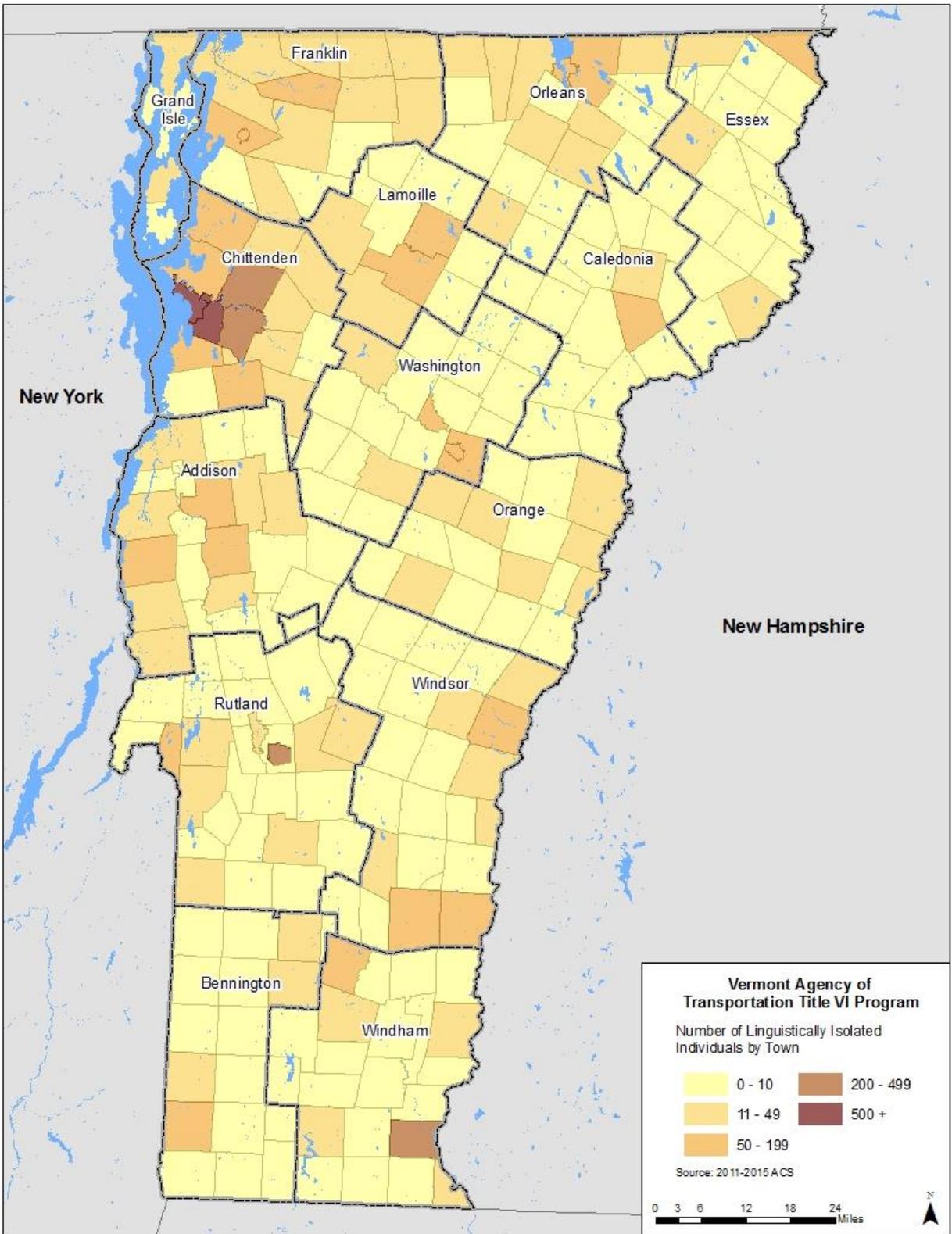
Other than these outreach efforts, there is little reason for the general public to contact VTrans directly about public transportation issues. Thus, the other primary form of interaction of LEP individuals with VTrans is through subrecipients. The eight public transit providers in Vermont have more direct contact with LEP persons than VTrans, though the degree of interaction varies across the state. It is the responsibility of the providers—which include one transit authority, one transit district, and six 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.

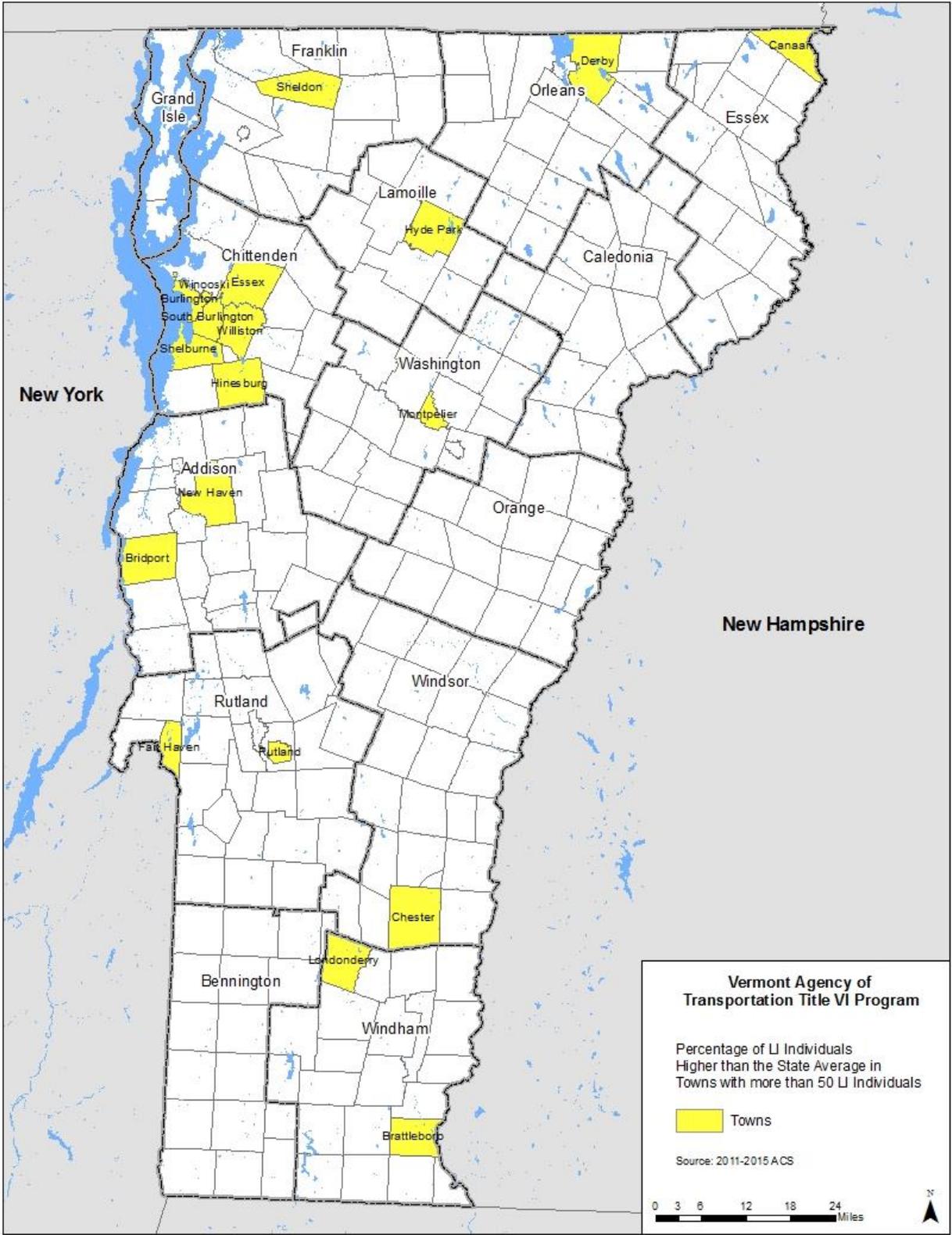
The forms of LEP interaction experienced by the transit providers include the following:

- 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 paratransit, Elders and Persons with Disabilities transportation, and general public dial-a-ride
- Handling passenger complaints
- Gathering data such as on-board customer surveys.

The maps presented on pages 15-16 illustrate where LEP individuals reside in the state of Vermont. These are based on 2011-2015 American Community Survey data. The first map shows the number of individuals by town who speak English "less than very well." In 58 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 99 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, 223 of Vermont's 251 cities and towns (89%) have fewer than 50 LEP individuals. There were only seven municipalities with more than 200 LEP individuals; five of these were in Chittenden County. The other two were Rutland and Brattleboro.

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 1.43%. These cities and towns represent "concentrations" of LEP individuals of which VTrans and the transit providers need to be aware.





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. Several of these rank among the more populous municipalities in Vermont: Rutland, Brattleboro, Bennington, St. Johnsbury, Montpelier and Barre. There are two rural communities with more than 100 LEP individuals: Sheldon (near the Canadian border) and Hyde Park (in Lamoille County). The majority of LEP individuals in these towns are Spanish speakers, likely representing migrant farmworkers.

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, other than in the core of Chittenden County, 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 eight (soon to be seven) 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 Green Mountain Transit (formerly the Chittenden County Transportation Authority and Green Mountain Transit Agency) covers five counties. The other providers mostly cover a single county, with Windsor County being divided between Stagecoach Transportation Services and Southeast Vermont Transit.

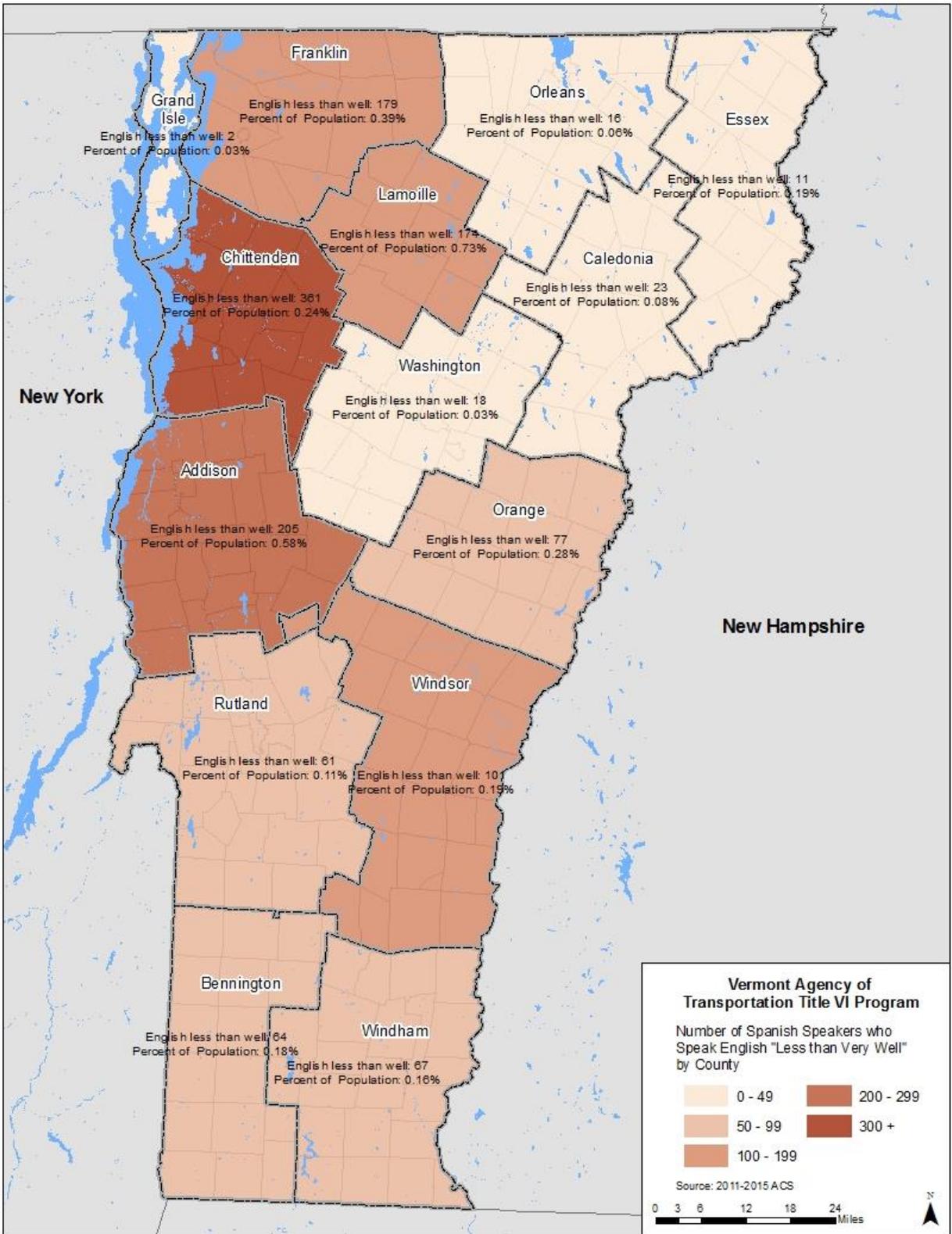
As mentioned above, most interactions between LEP individuals and the public transportation system in Vermont are likely to happen at the level of the transit provider, rather than with VTrans staff. Thus, it makes sense to consider concentrations of LEP persons by language group at the county level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

The maps on the pages 18-19 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. (The language group "Other Indic Languages" has nearly 1,000 individuals, but these are concentrated in Burlington and Winooski, reflecting an influx of refugees from Bhutan over the past decade. The Title VI program for Green Mountain Transit discusses this population in more detail.)

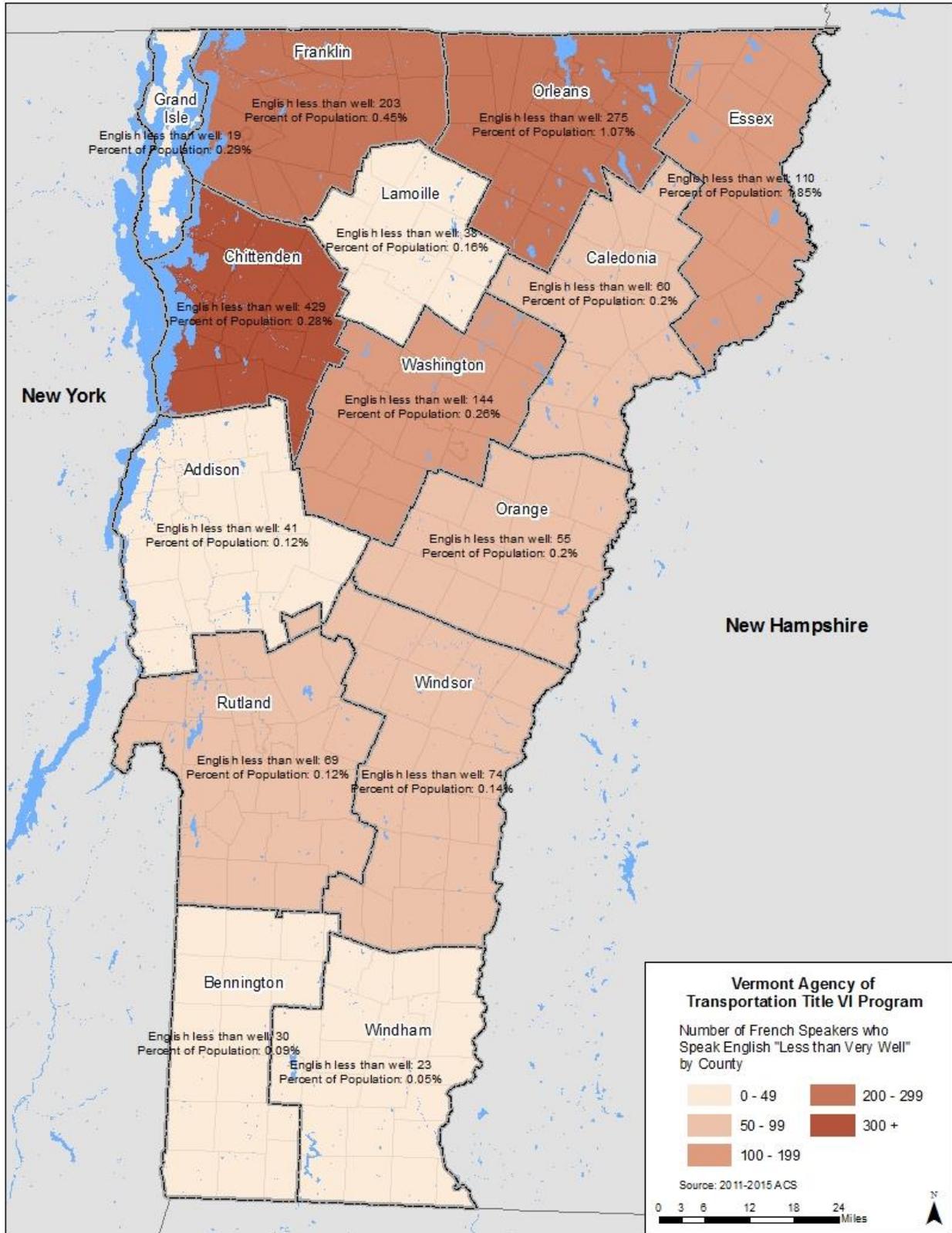
On the Spanish map, it can be seen that only two counties, Addison and Chittenden, have over 200 Spanish-speaking individuals that speak English less than very well. Only in Addison County is the percentage of people in this group more than one half of one percent of the population.

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 100 French-speaking individuals who speak English less than very well, and the percentage rises to 1.9% in sparsely populated Essex County and 1.1% in Orleans County. Rural Community Transportation, which covers Essex, Orleans, and Caledonia Counties, has published 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 2011-2015 American Community Survey from the US Census.



County	English less than well	Percent of Population
Franklin	179	0.39%
Orleans	16	0.06%
Essex	11	0.19%
Lamoille	17	0.73%
Caledonia	23	0.08%
Washington	18	0.03%
Orange	77	0.28%
Windsor	10	0.19%
Rutland	61	0.11%
Bennington	64	0.18%
Windham	67	0.16%
Addison	205	0.58%
Chittenden	361	0.24%
Grand Isle	2	0.03%



## 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	596,209	35,370	34,863	29,447	151,897	5,936	45,562	6,658	23,677	27,572	25,772	57,819	56,181	41,870	53,585
Spanish or Spanish Creole	1,359	205	64	23	361	11	179	2	174	77	16	61	18	67	101
French (incl. Patois, Cajun)	1,570	41	30	60	429	110	203	19	38	55	275	69	144	23	74
French Creole	32	-	-	-	-	-	-	-	-	-	-	32	-	-	-
Italian	122	4	4	-	50	2	3	-	11	-	-	28	-	18	2
Portuguese or Portuguese Creole	99	-	-	1	56	4	-	4	27	-	-	5	-	2	-
German	280	6	48	-	45	2	8	5	3	23	11	23	42	23	41
Yiddish	4	2	-	-	-	-	-	-	-	-	2	-	-	-	-
Other West Germanic languages	26	10	-	-	9	-	-	-	-	-	-	-	-	-	7
Scandinavian languages	26	-	-	-	-	-	-	5	2	-	5	8	-	6	-
Greek	67	-	-	-	24	-	-	-	-	5	2	5	-	-	31
Russian	204	4	3	5	166	-	-	5	-	-	-	3	3	-	15
Polish	74	5	-	3	37	-	19	-	-	-	6	1	3	-	-
Serbo-Croatian	508	31	-	-	352	-	-	2	-	-	-	-	123	-	-
Other Slavic languages	34	1	-	-	15	-	-	-	-	2	-	11	3	2	-
Persian	48	-	-	-	36	-	3	-	-	-	-	-	9	-	-
Hindi	31	-	-	4	27	-	-	-	-	-	-	-	-	-	-
Urdu	21	15	-	-	-	-	-	-	-	-	-	-	6	-	-
Other Indic languages	939	-	-	-	936	-	-	-	-	3	-	-	-	-	-
Other Indo-European languages	123	1	-	3	89	-	-	-	-	-	-	-	-	28	2
Chinese	720	5	6	76	407	3	6	-	-	4	9	88	3	53	60
Japanese	147	3	60	3	-	-	2	-	-	11	-	57	11	-	-
Korean	116	16	2	1	28	-	-	-	-	-	2	-	5	-	62
Thai	126	3	2	-	84	-	7	-	-	-	-	27	3	-	-
Laotian	104	-	-	-	33	-	-	-	-	-	-	-	-	71	-
Vietnamese	580	5	24	-	498	-	-	-	-	-	-	33	18	-	2
Other Asian languages	266	-	-	-	242	-	-	-	-	-	-	-	-	19	5
Tagalog	129	2	-	-	42	-	8	-	-	-	3	61	3	4	6
Other Pacific Island languages	64	-	-	-	9	-	-	-	-	3	2	29	-	21	-
Other Native N. Amer. languages	2	-	-	-	-	-	-	-	-	-	-	-	-	-	2
Hungarian	7	2	-	-	-	-	-	-	-	-	-	5	-	-	-
Arabic	300	-	-	3	282	-	-	-	-	-	-	-	-	15	-
Hebrew	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
African languages	403	9	2	-	351	-	-	-	-	-	-	12	5	24	-
Other and unspecified languages	10	-	-	-	-	-	-	-	-	-	10	-	-	-	-

Source: 2011-2015 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	0.23%	0.58%	0.18%	0.08%	0.24%	0.19%	0.39%	0.03%	0.73%	0.28%	0.06%	0.11%	0.03%	0.16%	0.19%
French (incl. Patois, Cajun)	0.26%	0.12%	0.09%	0.20%	0.28%	1.85%	0.45%	0.29%	0.16%	0.20%	1.07%	0.12%	0.26%	0.05%	0.14%
French Creole	0.01%											0.06%			
Italian	0.02%	0.01%	0.01%		0.03%	0.03%	0.01%		0.05%			0.05%		0.04%	0.00%
Portuguese or Portuguese Creole	0.02%			0.00%	0.04%	0.07%		0.06%	0.11%			0.01%		0.00%	
German	0.05%	0.02%	0.14%		0.03%	0.03%	0.02%	0.08%	0.01%	0.08%	0.04%	0.04%	0.07%	0.05%	0.08%
Yiddish	0.00%	0.01%									0.01%				
Other West Germanic languages	0.00%	0.03%			0.01%										0.01%
Scandinavian languages	0.00%							0.08%	0.01%		0.02%	0.01%		0.01%	
Greek	0.01%				0.02%					0.02%	0.01%	0.01%			0.06%
Russian	0.03%	0.01%	0.01%	0.02%	0.11%			0.08%				0.01%	0.01%		0.03%
Polish	0.01%	0.01%		0.01%	0.02%		0.04%				0.02%	0.00%	0.01%		
Serbo-Croatian	0.09%	0.09%			0.23%			0.03%					0.22%		
Other Slavic languages	0.01%	0.00%			0.01%					0.01%		0.02%	0.01%	0.00%	
Persian	0.01%				0.02%		0.01%						0.02%		
Hindi	0.01%		0.01%		0.02%										
Urdu	0.00%	0.04%											0.01%		
Other Indic languages	0.16%				0.62%					0.01%					
Other Indo-European languages	0.02%	0.00%		0.01%	0.06%									0.07%	0.00%
Chinese	0.12%	0.01%	0.02%	0.26%	0.27%	0.05%	0.01%			0.01%	0.03%	0.15%	0.01%	0.13%	0.11%
Japanese	0.02%	0.01%	0.17%	0.01%			0.00%			0.04%		0.10%	0.02%		
Korean	0.02%	0.05%	0.01%	0.00%	0.02%						0.01%		0.01%		0.12%
Thai	0.02%	0.01%	0.01%		0.06%		0.02%					0.05%	0.01%		
Laotian	0.02%				0.02%									0.17%	
Vietnamese	0.10%	0.01%	0.07%		0.33%							0.06%	0.03%		0.00%
Other Asian languages	0.04%				0.16%									0.05%	0.01%
Tagalog	0.02%	0.01%			0.03%		0.02%				0.01%	0.11%	0.01%	0.01%	0.01%
Other Pacific Island languages	0.01%				0.01%					0.01%	0.01%	0.05%		0.05%	
Other Native N. Amer. languages	0.00%														0.00%
Hungarian	0.00%	0.01%										0.01%			
Arabic	0.05%		0.01%		0.19%									0.04%	
Hebrew															
African languages	0.07%	0.03%	0.01%		0.23%							0.02%	0.01%	0.06%	
Other and unspecified languages	0.00%										0.04%				

Source: 2011-2015 American Community Survey

It can be seen that within any county, no language group surpasses 1,000 individuals or 5% of the population in any county in Vermont, thus suggesting that individual transit providers do not face any group of linguistically isolated individuals which would exceed the thresholds of the safe harbor provision.

At the statewide level, both French and Spanish have more than 1,000 individuals, but as stated above, the French speakers are spread across the entire northern tier of the state, and Spanish speakers are spread among many counties and reflect primarily migrant farm workers who make relatively little use of public transportation.<sup>1</sup> On the occasions when VTrans holds public meetings on statewide projects, it offers translation services upon request (see below for more information). It would not be an effective use of resources to prepare all vital documents in Spanish and French without a direct request to do so from one or more individuals. If, in the future, there are requests for statewide documents to be translated into French or Spanish (or other languages), VTrans will honor those requests either by providing the written translation, or contacting those individuals to provide oral translation services to answer their questions.

## 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 of *Interpretation and Translation Services* at the end of this section.)

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

Public Meeting	Date	Location	Agency
Public Transit Advisory Council, open to the public	9/18/14	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	12/18/14	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	3/19/15	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	6/18/15	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	9/17/15	Chittenden County Transit, Burlington	Chittenden County
Public Transit Advisory Council, open to the public	12/17/15	GMCN, Bennington	Bennington
Public Transit Advisory Council, open to the public	3/17/16	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	6/16/16	MVRTD, Rutland	Rutland
Public Transit Advisory Council, open to the public	9/15/16	VTrans headquarters, Montpelier	All Vermont
Amtrak Shuttle Meeting	11/3/16	Bennington RPC	Bennington

<sup>1</sup> If the Spanish speakers in Chittenden County are removed from consideration, since they are covered under the Title VI program of CCTA, a direct FTA recipient, then the total number of linguistically isolated individuals who speak Spanish falls barely below the 1,000 threshold.

Amtrak Shuttle Meeting	11/29/16	Bennington College	Bennington
Public Transit Advisory Council, open to the public	12/15/16	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	3/16/17	VTrans headquarters, Montpelier	All Vermont
ACTR/STSI Merger Meeting	4/4/17	Bradford	ACTR/STSI
Public Transit Advisory Council, open to the public	6/15/17	VTrans headquarters, Montpelier	All Vermont

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.

On an ongoing basis, the eight (soon to be seven) 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 mobility. The eight 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 underrepresented 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.

### **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 shown on the table on page 26. 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. The transit providers were explicitly added to the Telelanguage contract in June of 2017. See pages 27-29 for details about Telelanguage services.

**SUMMARY OF VERMONT REFUGEE RESETTLEMENTS  
1997 - 2016**

Country of Origin	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	FY-14	FY-15	FY-16	TOTAL	
Burundi	1							12	11		43	29	9						6	6	117	
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	15	32	73	162	
Eritrea																	1	1			2	
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			1	11	
Somalia							19	143	129	95	58	16	86	27			25	47	55	80	780	
Sudan		5			39	1	8	26	18	24	6	10	2		1		3	10			153	
Togo					9		2	1	13				1								26	
Uganda										4											4	
China						1	1		4												6	
Bosnia	238	318	272	198	162	83	26	9	4												1,310	
Kosovo			58																		58	
Moldova						1	2	1			1										5	
Columbia									1												1	
Azerbaijan							18	15		1											34	
FSU	8																				8	
Georgia										6											6	
Russia									26	42	26	5									99	
Uzbekistan									2	53											55	
Afghanistan		8			11	10								1					1		31	
Iran		8																			3	11
Iraq												60	28	17	4	10	19	56	20	1	215	
Turkey												6									6	
Bhutan												129	158	189	311	298	256	173	192	218	1,924	
Sri Lanka										1			7								8	
Burma												71	40	55	34	42	17	24	7	4	294	
Vietnam	32	39	55	42	17	5			5												195	
<b>Grand Total</b>	<b>279</b>	<b>378</b>	<b>387</b>	<b>275</b>	<b>241</b>	<b>125</b>	<b>90</b>	<b>260</b>	<b>238</b>	<b>240</b>	<b>157</b>	<b>329</b>	<b>334</b>	<b>304</b>	<b>361</b>	<b>350</b>	<b>323</b>	<b>327</b>	<b>312</b>	<b>386</b>	<b>5,696</b>	

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.

## ***B. Providing Language Assistance***

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 Telelanguage are available to VTrans and all of the subrecipients. (See the following pages for more information.) Each provider was assigned a department code number and given instructions on how to use the service.

## ***C. 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.

## ***D. Monitoring, Evaluating and Updating the LAP***

Through monitoring news reports and communication with the Vermont Refugee Resettlement Program, VTrans stays abreast of changes in the composition of language access needs in Vermont. Of course, the update of this Title VI Program every three years necessitates the downloading of new data from the Census, which also indicates any new populations which may face language barriers. VTrans also works closely with its subrecipients, which have more direct interactions with immigrants, to update its information regarding LEP needs (see below).

## ***E. 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.

## ***Oversight of Subrecipients' LEP Programs***

Each of the transit providers which are subrecipients of FTA funds has an LEP plan in place as part of its Title VI Program. VTrans requires that all subrecipients submit a Title VI Program at least every three years, and these programs must contain an LAP that is compliant with federal regulations. Validity of the LAP is part of the triennial reviews that VTrans conducts. The transit providers track interactions with LEP persons that result 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 (i.e., 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 2017, GMT is the most likely agency to come into contact with LEP persons, and its procedures are discussed in more detail in its Title VI program. Rural Community Transportation in the Northeast Kingdom takes measures to address the many French speakers in its service area. 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 LEP individuals.

## Vermont Agency of Transportation INTERPRETATION & TRANSLATION SERVICES

Service Provider	Fee Structure	Process
<p><b>In-Person Interpretation</b></p>	<p><b>Association of Africans Living in Vermont (AALV)</b> 20 Allen Street, 3<sup>rd</sup> Floor Burlington, VT 05401 (802) 985-3106 <b>Online:</b> Complete the request form at <a href="https://www.aalv-vt.org/">https://www.aalv-vt.org/</a>. (Your request will be confirmed by email.)</p> <p><b>Email:</b> send your request to <a href="mailto:aalvinterpret@gmail.com">aalvinterpret@gmail.com</a></p> <p><b>After hours urgent requests:</b> Call (802) 324-9794</p>	<ul style="list-style-type: none"> <li>• Base rate is \$50 an hour.</li> <li>• 15-minute minimum charge, then charge is for 15-min increments.</li> <li>• No surcharge for afterhours, weekends, or holidays.</li> <li>• No charge for first 50 miles, state mileage rates used thereafter.</li> <li>• No charge for cancellations with at least 12 hours' notice; one-hour charge for less than 12 hours' notice.</li> <li>• Telephone call to client to confirm appt is available for \$5 per appointment.</li> </ul> <ul style="list-style-type: none"> <li>• Department requests interpreter</li> <li>• At least 5 working days' notice required for guaranteed service; AALV will try to satisfy requests with less notice.</li> <li>• AALV bills the Department directly.</li> <li>• Department pays AALV.</li> <li>• Code expenses to account #507616</li> </ul>
<p><b>Telephonic Interpretation &amp; Written Translation Services</b> <u>BGS Contract #31184</u></p>	<p><b>Telelanguage Inc.</b> 514 SW 6<sup>th</sup> Avenue 4<sup>th</sup> Floor Portland, OR 92204 <a href="http://telelanguage.com">http://telelanguage.com</a></p> <p>Toll Free: 1.888.983.5352 E-mail: <a href="mailto:info@telelanguage.com">info@telelanguage.com</a></p>	<ul style="list-style-type: none"> <li>• Free, one-time setup for initial account, implementation, and training. No monthly service fee.</li> <li>• <b>Telephonic Interpretation:</b></li> <li>• Rate is \$0.72 per minute for telephonic interpretation.</li> <li>• Flat rate across 170 languages, on demand 24/7/365.</li> <li>• <b>Video Interpretation:</b></li> <li>• Rate is \$3.75 per minute.</li> <li>• <b>Translation Services:</b></li> <li>• Written translation rate is 0.28 per word.</li> <li>• Written translation technical rate is 0.30 per word.</li> <li>• Written translation rush service within 24 hours is 20% more than base rate.</li> </ul> <p>Contractor invoices include itemization of work performed with name of requester, organization unit, language, time, date, type of service, number of words, and</p> <ul style="list-style-type: none"> <li>• To open an account, your business manager needs to contact Tim Bernal. Tim will ask what information the employee needs to provide when requesting the service and set up the account and process.</li> <li>• <a href="mailto:tbernal@telelanguage.com">tbernal@telelanguage.com</a> Toll Free: 1.888.983.5352 Main: 503.535.2178</li> <li>• Ask your business manager for account number, access code, etc.</li> <li>• Telelanguage invoices the Department or Division and Department/Division pays Telelanguage.</li> <li>• Code expenses to account #31184</li> </ul>



# IF YOU NEED AN INTERPRETER

Please **point to your language**, we will call an Interpreter.

<b>Spanish</b> — Español .....	Por favor, señale su idioma. Nosotros llamaremos a un interprete.
<b>Amharic</b> — አማርኛ .....	“እባክዎ ቋንቋዎን ጠቁመው ያሳዩ። አንድ አስተርጓሚ እንጠራልዎታልን።”
<b>Arabic</b> — العربية .....	رجاء، أشر إلى لغتك . سندعوا لك مترجما .
<b>Bosnian</b> — Bosanski .....	Molim vas pokazite na vas govomi jezik. Mi cemo pozvati prevodioca.
<b>Burmese</b> — မြန်မာစာ .....	ကျေးဇူးပြု၍ခင်ဗျားရဲ့စကားကိုပြောပြပါ ခင်ဗျားကိုစကားပြန်ခေါ်ပေးမယ်။
<b>Cambodian</b> — ខ្មែរ .....	សូមចង្អុលទៅភាសារបស់អ្នក ។ យើងនឹងទូរស័ព្ទទៅអ្នកបកប្រែម្នាក់ ។
<b>Cantonese</b> — 廣東話 .....	請指示您所講的語言。我們會找翻譯。
<b>Creole</b> — Creole .....	S'il vous plait, signale ki less ki language ou. Na va rele yon inteprete
<b>Farsi</b> — فارسی .....	لطفا به زبانی که حرف میزنید اشاره کنید. ما یک مترجم صدا مکسم
<b>French</b> — Français .....	S'il vous plait, montrez nous la langue que vous parlez. Nous vous appellerons un interprète.
<b>Hindi</b> — हिन्दी.....	कृपया अपनी भाषा की ओर इशारा कीजिये । हम एक अनुवादक को बुलायेंगे ।
<b>Hmong</b> — Hmoob .....	Thov tau rau koj yam lus. Peb mam li hu rau ib tus neeg pes lus.
<b>Japanese</b> — 日本語 .....	あなたの国の言葉を指してください。通訳者におつなぎします。
<b>Karen</b> — ကညီကလုာ် .....	ဝံသးစူဒးနံာ်ဘၣ်နကတိၤကျိာ်တက့ၢ်,ပကတိၤန့ၢ်နပုၤကတိၤကျိးထံတၢ်လီၤ
<b>Korean</b> — 한국어 .....	당신의 모국어(母國語)를 가리켜 주십시오. 통역관(通譯官)을 연결시켜 드리겠습니다.
<b>Lao</b> — ລາວ .....	ກະລຸນາຊີ້ແຈງພາສາຂອງທ່ານ. ພວກເຮົາຈະໂທຫາລ່າມແປພາສາ.
<b>Mandarin</b> — 國語 .....	請指示您所講的語言。我們會找翻譯。
<b>Portuguese</b> — Português .....	Por favor, aponte seu idioma. Nós chamaremos um intérprete.
<b>Romanian</b> — Română .....	Vă rugăm, indicați limba dumneavoastră. Vă vom chema un interpret.
<b>Somali</b> — Af-Soomaali .....	Fadlan noo tilmaan afkaaga. Waxaan kuugu yeeri turjubaan.
<b>Russian</b> — Русский .....	Пожалуйста, укажите на ваш язык и мы позовём вам переводчика.
<b>Swahili</b> — Kiswahili .....	Tafadhali onyesha lugha yako. Tutamuita mtafsiri.
<b>Thai</b> — ภาษาไทย .....	กรุณาเลือกภาษาที่คุณต้องการ เราจะติดต่อล่ามให้คุณ
<b>Urdu</b> — وِدرَا .....	گے یرک نونف وک نامچرت کی ا مہ یرک رامظا اک نابز ینپا ین ابرم مارب .
<b>Vietnamese</b> — Tiếng Việt Nam .....	Xin hãy chỉ vào ngôn ngữ của quý vị. Chúng tôi sẽ gọi người thông ngôn.

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FTA Title VI/Environmental Justice Program 2017  
Vermont Agency of Transportation



Acholi  
Afrikaans  
Akan  
Albanian  
American Sign Language  
Amharic  
Arabic  
Armenian  
Ashanti  
Assyrian  
Azerbaijani  
Bambara  
Basque  
Bassa  
Behdink  
Belarusian  
Bengali  
Bosnian  
Bulgarian  
Burmese  
Cantonese  
Cape Verde  
Catalan  
Cebuano  
Chaldean  
Cham  
Chamorro  
Chau-jo  
Cherokee  
Chinese  
Chouja  
Chaukese  
Creole  
Croatian  
Czech  
Danish  
Dari (Persian)  
Dimli  
Dinka  
Duala  
Dutch  
Edo  
Efik  
Estonian  
Ethiopian  
Ewe  
Farsi (Persian)

Fijian  
Filipino  
Finnish  
Flemish  
French  
French Canadian  
French Creole  
Frisian (West)  
Fujianese  
Fukinese  
Fula  
Fulani  
Fuzhou  
Ga  
Gaelic  
Ganda  
Garre  
Georgian  
German  
Gilaki  
Grebo  
Greek  
Greenlandic  
Gujarati  
Haitian Creole  
Haka Burmese  
Hakka  
Harari  
Hausa  
Hebrew  
Hindi  
Hmong  
Ho  
Hunanese  
Hungarian  
Iban  
Ibang  
Icelandic  
Lgbo  
Ilocano  
Indonesian  
Jaaxanke  
Jakartanese  
Japanese  
Javanese  
Kakwa  
Kanjobal

Kankanay  
Kannada  
Karen  
Kashmir  
Kayah  
Kazakh  
Khmer (Cambodian)  
Kikamba  
Kikuyu  
Kinyarwanda  
Kirghiz  
Kirundi  
Korean  
Kosrae  
Kpelle  
Krahn  
Kurdish  
Lakota  
Laotian  
Latin  
Latvian  
Lebanese  
Liberian  
Lingala  
Lithuanian  
Luganda  
Luo (Dhuluo)  
Maay  
Macedonian  
Malagasy  
Malay  
Malayalam  
Malaysian  
Maltese  
Mam  
Mandarin  
Mandingo  
Mandinko  
Mankon  
Marathi  
Marshallese  
Maylay  
Meru  
Mien  
Mina  
Mixteco  
Mixteco Alto

Mixteco Bajo  
Moldovan  
Mongolian  
Moroccan Arabic  
Myanmar  
Nahuati  
Navajo  
Nepali  
Newari  
Nigerian  
Norwegian  
Nuer  
Ojibay  
Oromifa  
Oromo  
Pahari  
Palauan  
Pampangan  
Papiamento  
Pashto  
Polish  
Ponapean  
Portuguese  
Portuguese Brazilian  
Portuguese Creole  
Potwari  
Pilaar  
Punjabi  
Quechua  
Quiche Rhade  
Romanian  
Rundi  
Russian  
Samoan  
Sara  
Serbian  
Serbo Croatian  
Shanghalinese  
Shona  
Sichuan  
Sicilian Sindhi  
Sinhala  
Sinhalese  
Slovak  
Slovenian  
Somali Soninke  
Sotho

Spanish (European)  
Spanish (Latin America)  
Spanish (Mexican)  
Sudanese  
Swahili  
Swedish  
Syrian  
Tagalog  
Tahitian  
Taiwanese  
Tajiki  
Tamal  
Tamang  
Tamil  
Tarasco  
Tatar  
Telugu  
Teochew  
Thai  
Thai Dam  
Tibetan  
Tigrigna  
Tigrinya  
Toishanese  
Tokelau  
Tongan  
Trukese (Chuukese)  
Tshiluba  
Tsonga  
Tswana  
Turkish  
Turkmen  
Twi  
Ukranian  
Urdu  
Uzbek  
Vangali  
Vietnamese  
Visayan (Cebuano)  
Welsh  
Wolof  
Wu  
Yi  
Yiddish  
Yoruba  
Zapoteco  
Zulu

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# DID YOU KNOW?

- ★ There are over 2700 languages and over 6000 dialects
- ★ 46 languages have one single speaker
- ★ 2200 of the world's languages are spoken in Asia



## 11 Tips to effectively communicate with an interpreter...

- 1 Brief interpreter prior to a conversation
- 2 The interpreter is there to purely translate what is being said
- 3 Ask interpreter not to change or alter any part of the conversation
- 4 Speak clearly and in a normal tone
- 5 Allow more time for interpreted communication
- 6 Be aware of cultural factors
- 7 Refrain from using metaphors, acronyms, slangs or idioms
- 8 Remember to pause between sentences
- 9 Speak directly to the non-English caller, not the interpreter
- 10 Treat interpreter as a professional
- 11 Permit only one person to speak at a time

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LANGUAGE

## VII. Composition of Boards and Councils

The only ongoing committee that 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. The composition of the committee is determined by state law (24 VSA Section 5084) as shown below. Only one member of this committee (line 14) is not a designee of an agency or organization. This committee is currently 100% Caucasian.

### **§ 5084. Public transit advisory council**

(a) A public transit advisory council shall be created by the secretary of transportation under 19 V.S.A. § 7(f)(5), to consist of the following members:

- (1) the secretary of transportation or designee;
- (2) the executive director of the Vermont public transportation association;
- (3) three representatives of the Vermont public transportation association;
- (4) a representative of the Chittenden County transportation authority;
- (5) the secretary of human services or designee;
- (6) the commissioner of employment and training or designee;
- (7) the secretary of commerce and community development or designee;
- (8) a representative of the Vermont center for independent living;
- (9) a representative of the council of Vermont elders;
- (10) a representative of private bus operators and taxi services;
- (11) a representative of Vermont intercity bus operators;
- (12) a representative of the Vermont association of planning and development agencies;
- (13) a representative of the Vermont league of cities and towns;
- (14) a citizen appointed by the governor;
- (15) a member of the senate, appointed by the committee on committees; and
- (16) a member of the house of representatives, appointed by the speaker.

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% Caucasian.

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

## VIII. 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 eight 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 4702.1B. In addition to requirements outlined in the circular, subrecipients 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. 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	Most recent Title VI Program Submission	Location of services and facilities, non-discriminatory? Y/N	Civil Rights Discrimination complaints since last review?	Next scheduled review
ACTR	10/1/15	9/2016	Y	No	**
GMT Rural	6/10/17	N/A*	Y	No	7/10/20
MVRTD	10/15/14	9/2016	Y	No	10/17/17
Castleton Community Seniors (sub of MVRTD)	10/15/14	N/A	Y	No	10/17/17
RCT	10/6/15	9/2016	Y	No	10/18/17
STSI	8/23/15	9/2016	Y	No	**
SEVT	10/1/15	5/2017	Y	No	7/17/17
Advance Transit	12/1/15	3/2017	Y	No	11/18/18
GMCN	11/12/15	7/2017	Y	No	11/18/18

\* GMT Rural was included in CCTA's direct recipient Title VI Program submitted to FTA in July 2017

\*\* ACTR and STSI are in the process of merging into a new agency to be called Tri-Valley Transit. Management reviews will be scheduled after the merger is completed.

In addition to the regular periodic reviews, VTrans staff frequently attend meetings of transit providers. The transit coordinators generally attend monthly board meetings of each of the transit providers. On the next few pages are the results of selected management reviews undertaken over the past two years.

## GMCN 2015

### TITLE VI—NONDISCRIMINATION IN THE DELIVERY OF SERVICE

1. What is the racial composition of your service area?	98.2% White, not Hispanic	
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?	Downtown, approximately 1 block off Main Street and 2 blocks from the intersection of Routes 7 and 9, adjacent to a municipal (partially park and ride) lot.  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		
	<b>Complaint Description</b>	<b>Date Filed</b>
	<b>Status</b>	
	N/A	
5. Who investigates complaints?	The Management Team	
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?	We advertise as required, post notices and solicit suggestions from the riders.	
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?	All the time, using our standard marketing materials	

**AT 2015**

**TITLE VI—NONDISCRIMINATION IN THE DELIVERY OF SERVICE**

<p>1. What is the racial composition of your service area?</p>	<p>7.9 % Minority population spread over entire service area. Looked at LEP, did a passenger survey to collect data; 30 different languages spoken in a service area 44,322 and 1.92 % report that they speak English “less than well”. Largest sub-group (0.55%) of those speak Spanish. Most of those languages don’t really register statistically. Second largest group speaks Chinese (122 people) are affiliated with the graduate school at Dartmouth and are scattered all over the service area.</p>							
<p>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?</p>	<p>Yes.  It is.</p>							
<p>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?</p>	<p>Wilder – see maps. Trying to locate bus stops at areas of the most demand.</p>							
<p>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</p>								
<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:60%; text-align: center;">Complaint Description</th> <th style="width:20%; text-align: center;">Date Filed</th> <th style="width:20%; text-align: center;">Status</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: center;">None received</td> </tr> </tbody> </table>			Complaint Description	Date Filed	Status	None received		
Complaint Description	Date Filed	Status						
None received								
<p>5. Who investigates complaints?</p>	<p>ED</p>							
<p>6. Have any complaints concerning discrimination in the delivery of service been received? If yes:</p>	<p>No</p>							
<p>c) How were the complaints identified and resolved?</p>	<p>N/A</p>							
<p>d) Were complaints reported to VTrans?</p>	<p>N/A</p>							
<p>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?</p>	<p>See discussion about marketing plan. During TDP process and developing a Passenger Advisory Committee</p>							
<p>8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.</p>	<p>Nights and weekends have been requested, but that’s not likely to happen (funding constraints)</p>							
<p>9. How do you promote your service to minority populations?</p>	<p>Day to day interactions with the community. Contact with Senior Centers, Upper Valley Haven and youth programs/centers</p>							

## GMTA 2015

### TITLE VI—NONDISCRIMINATION IN THE DELIVERY OF SERVICE

1. What is the racial composition of your service area?	Washington County's minority population is 3.9%. Franklin County's minority population is 4.4%. Lamoille County's minority population is 3.6%. Grand Isle County's minority population is 4.9%. These are consistent with the Vermont average of 4.8%.	
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?	Yes, as noted above.  Yes	
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?	Washington, Orange, Franklin, Grand Isle, Lamoille counties. Yes, GMTA has posted Title VI notices on its buses, on the website, and in the Bus Map & Guide. GMTA also ensures all member of our service area population have the ability to comment on proposed service changes through public hearings, online, and phone comments.	
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?		
<b>Complaint Description</b>		<b>Date Filed</b>
<b>Status</b>		
NONE		
5. Who investigates complaints?	Jon Moore, Planning Manager, is our Title VI officer.	
6. Have any complaints concerning discrimination in the delivery of service been received? If yes:	No	
e) How were the complaints identified and resolved?	Transit Planner follows up with anyone who files a complaint	
f) Were complaints reported to VTrans?	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 hearings are held in accessible locations that can be reached via transit; Surveys accept comments from all passengers.	
8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.	Yes, we have heard from representatives of persons with disabilities that their needs should be considered in route and service change proposals	
9. How do you promote your service to minority populations?	Distribute materials to human service agencies; public housing authorities; public hearings; distribute BM&G in grocery stores, public buildings, doctors' offices, hospitals – see responses under Public Involvement questions 11, 12, 13	
10. Do you provide equal service to passengers with mobility devices no larger than a wheelchair?	yes	

## **IX. Transit Facility**

VTrans has no transit facilities and no plans to construct any. One of VTrans' subrecipients, SEVT, did construct a maintenance and administrative facility within the last three years. This facility was on the same site as the previous maintenance facility. An environmental analysis was conducted for that project, resulting in a Categorical Exclusion. Because the site of the new facility was the same as the existing facility and the existence of environmental documentation for the project, a separate Title VI equity analysis was not undertaken.

## **X. 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 2011-2015 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.

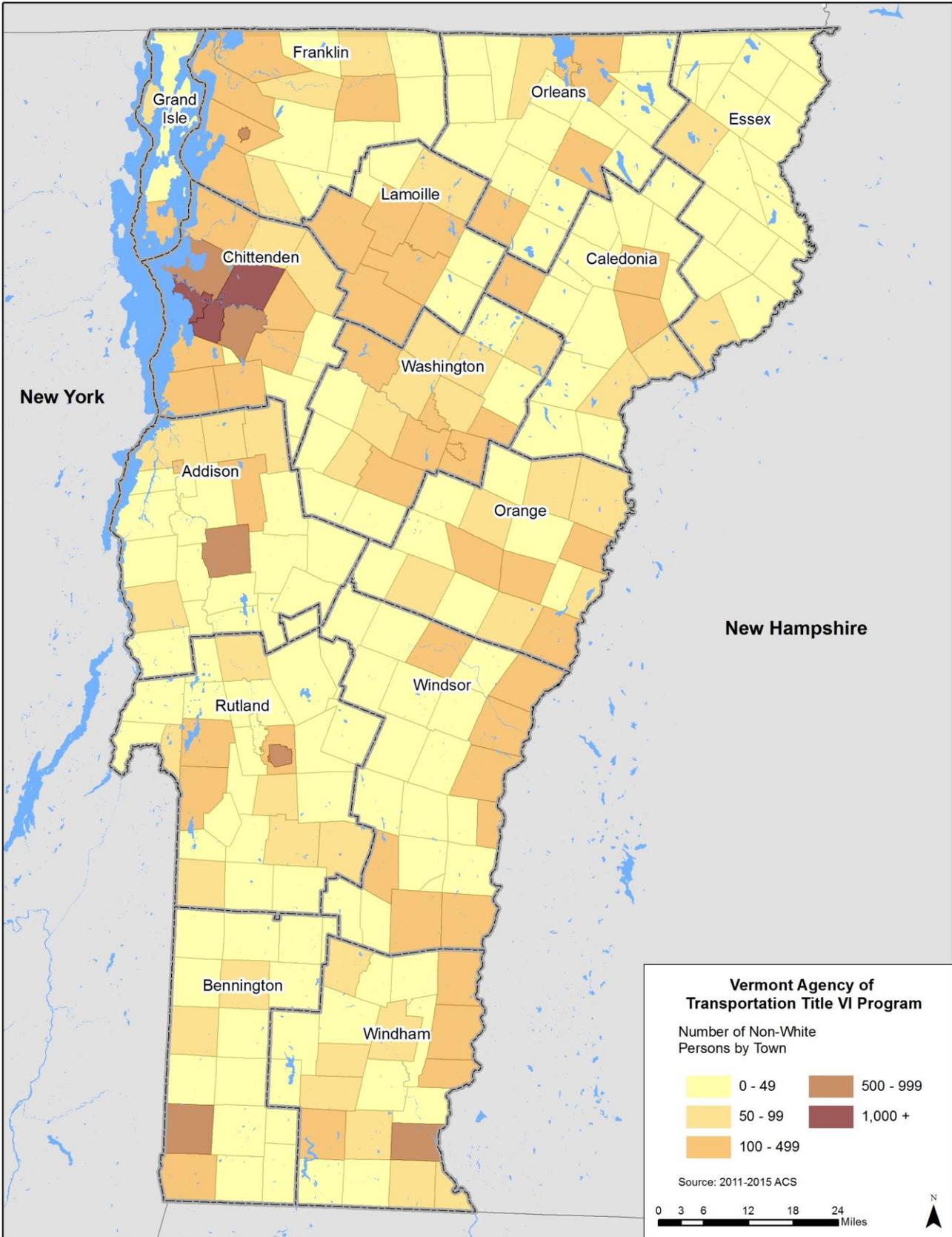
The municipalities with the greatest number of minorities are all within the core of Chittenden County: Burlington, South Burlington, Winooski, and Essex. The next tier of towns, with between 500 and 1,000 minority individuals include other Chittenden County communities (Williston and Colchester) as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

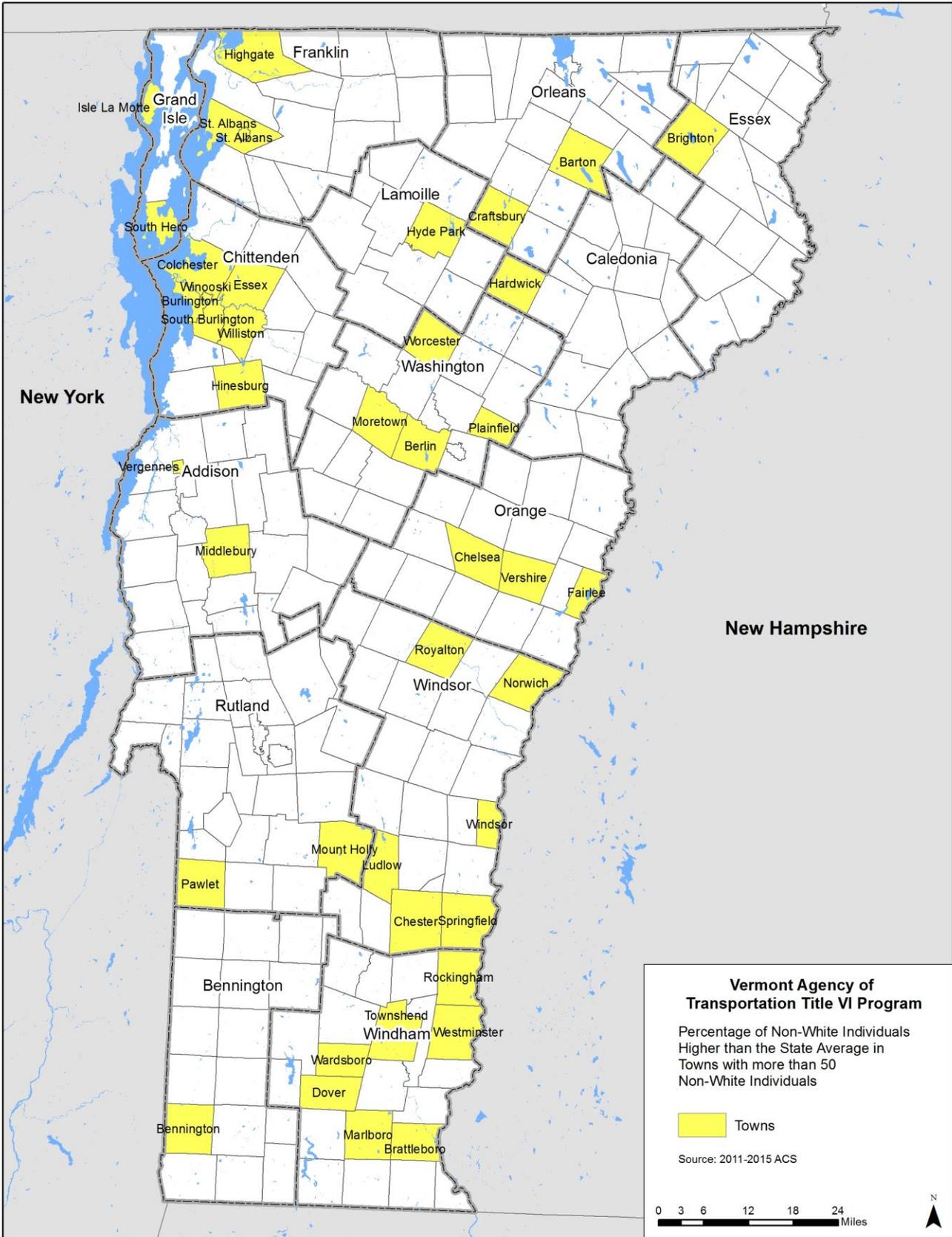
The concentrations of minority persons in significant numbers can be found in the core of Chittenden County, a cluster in Windham and southern Windsor County and other towns scattered among all of the counties in the state.

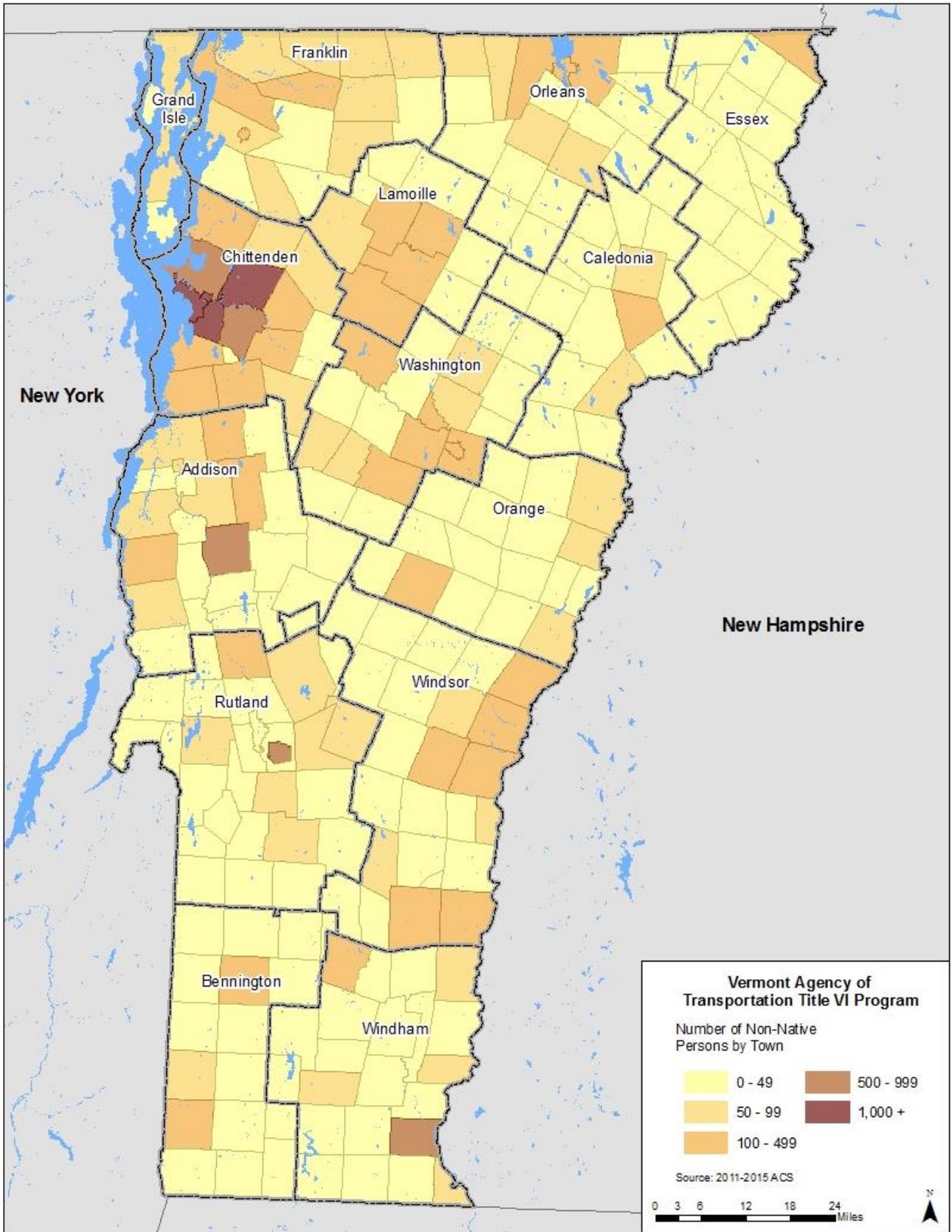
#### **Non-American National Origin**

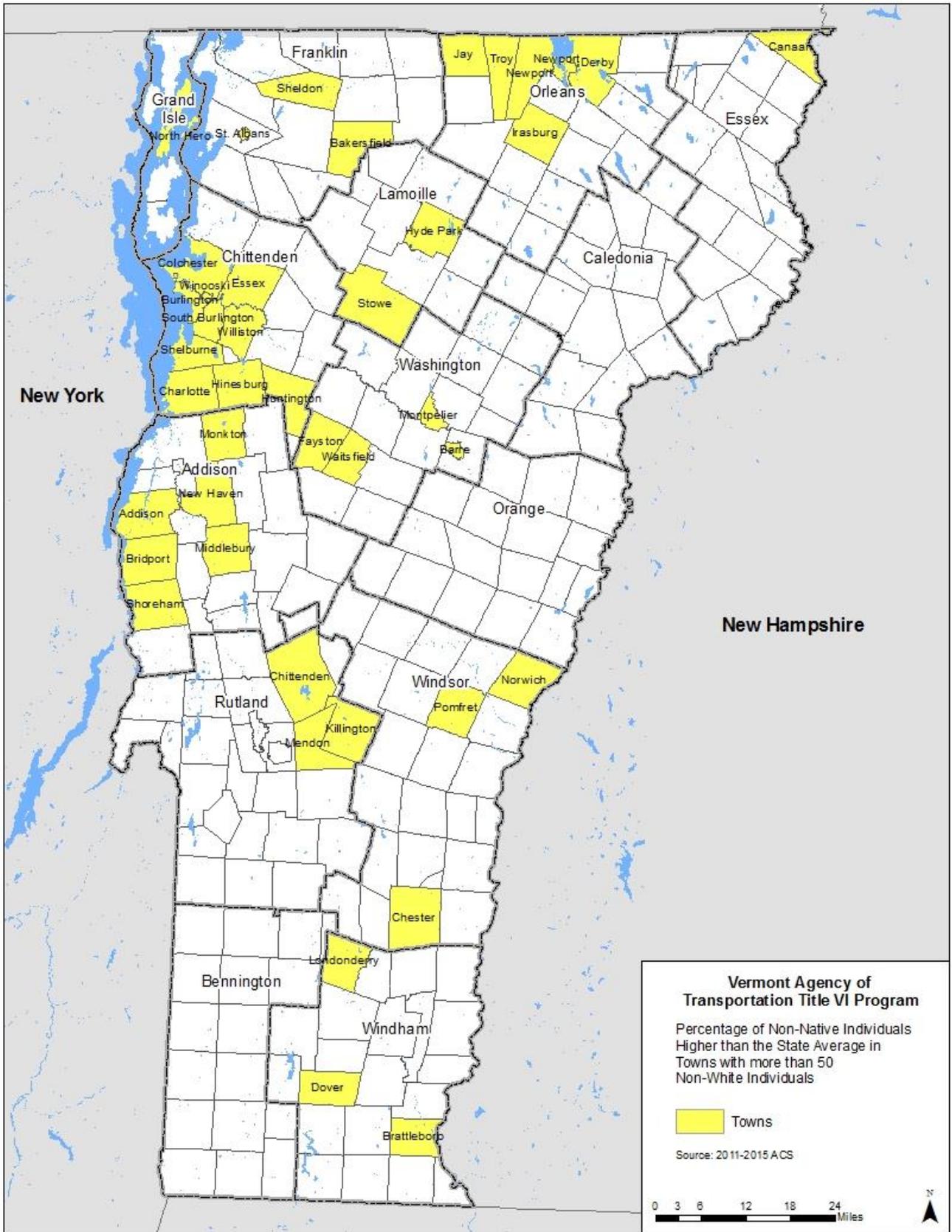
The two maps representing data on the national origin of Vermont residents are similar in many ways to the maps of minorities. The core of Chittenden County again has the highest totals and the whole northwestern sector has higher numbers than most of the rest of the state. The Connecticut River Valley 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) and much of Addison County has concentrations of non-natives. Three towns in northeastern Rutland County form a small cluster. There are relatively few towns in the eastern half of the state with concentrations of non-natives.









## 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 2015 American Community Survey (1-year) data<sup>2</sup>, about 10.2% of the population in the state are in households with income below the federal poverty level. In comparison, less than 1.5% of residents are not able to speak English very well, 5.3% of residents are minorities, and 4.7% of residents were not born in the United States.

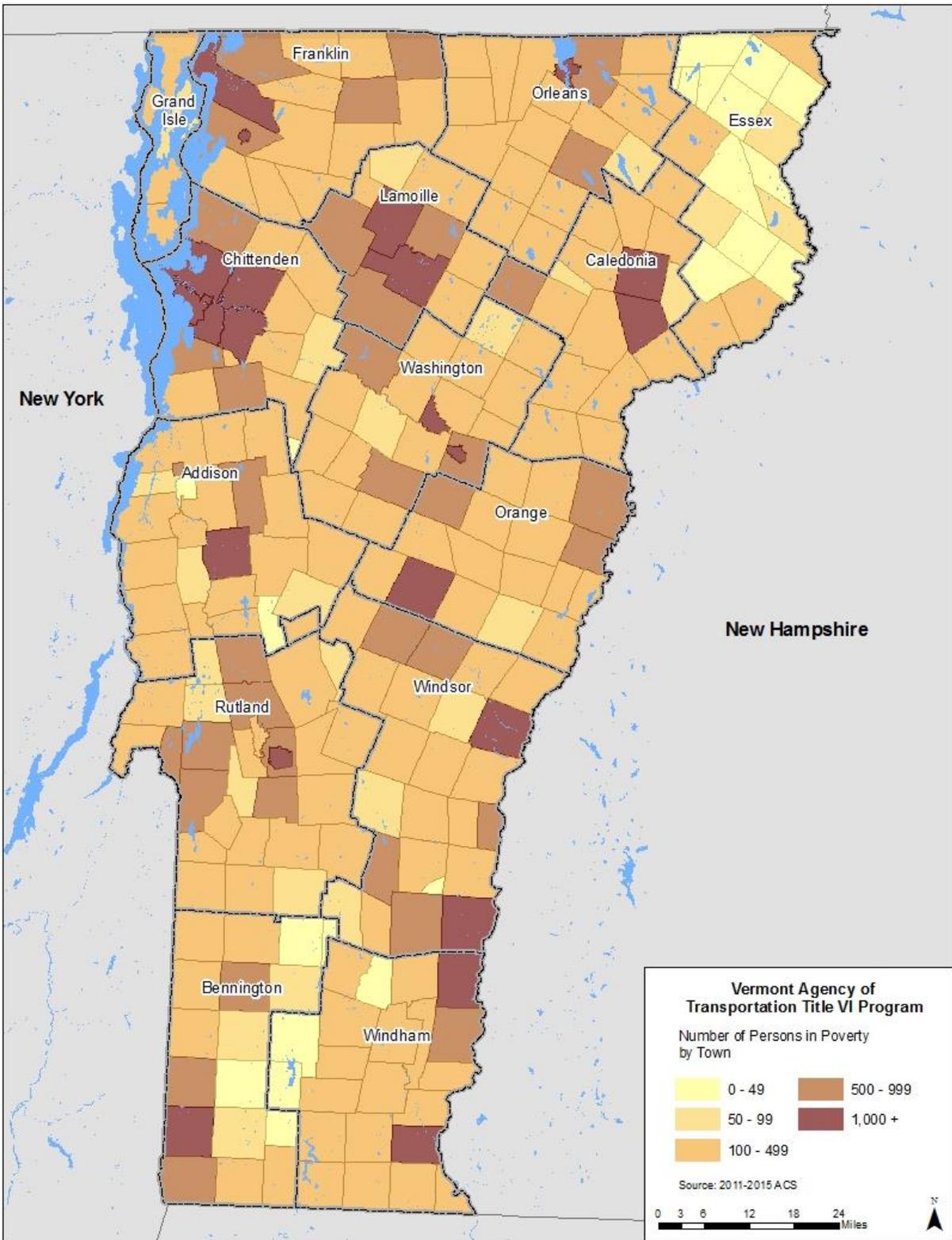
The analogous maps of low-income individuals show many of the same patterns as seen in the previous maps, though many more towns fall into the higher categories. The City of Burlington has the highest number, more than three times the next closest city, but much of this is likely due to the many college 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.

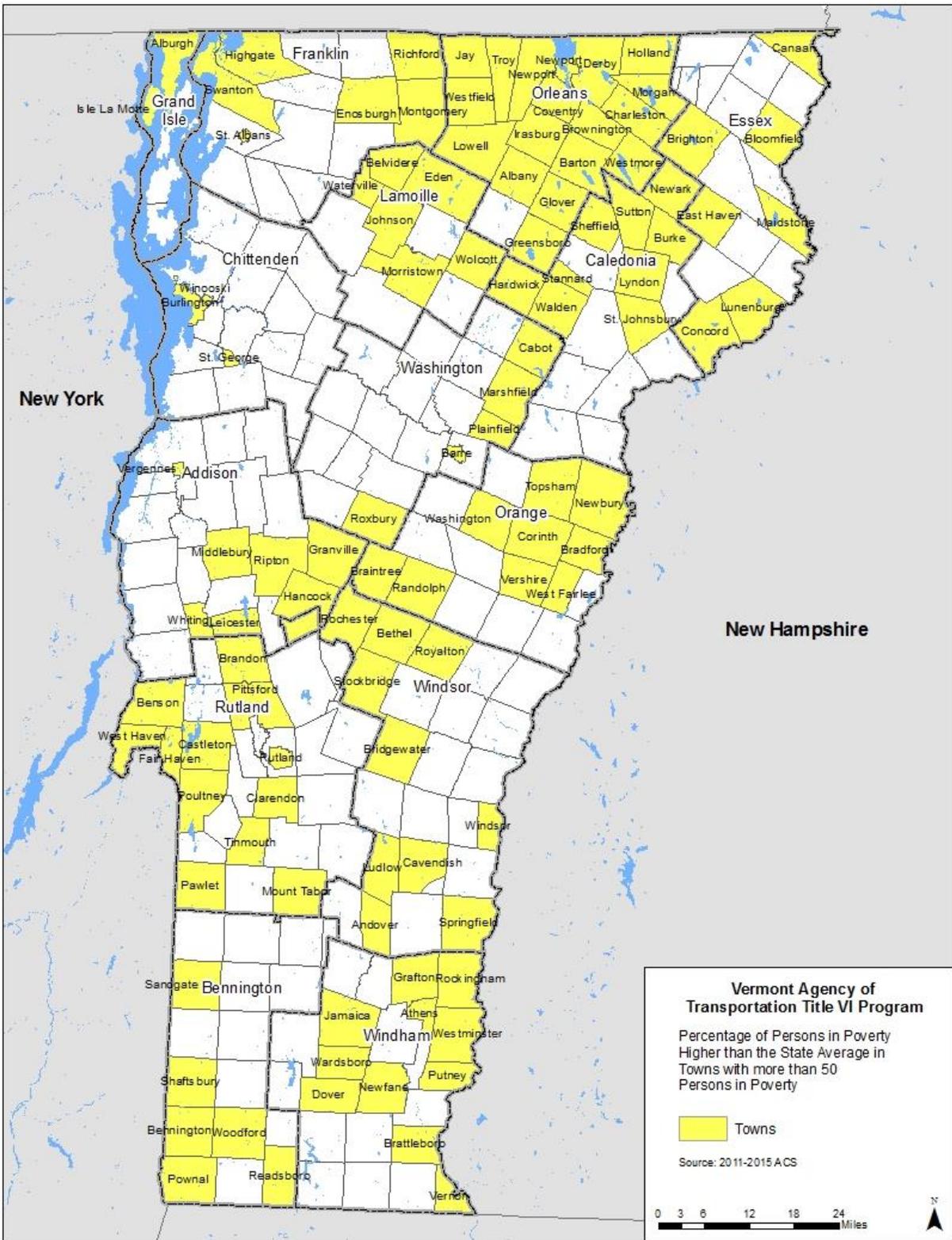
In spite of the high numbers in the communities surrounding Burlington, the percentages of people in poverty in most of these communities is below the state average. As mentioned above, Chittenden County offers the highest concentration of well-paid jobs in the state due to the presence of large employers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

Proximity to the large employment center in the Hanover-Lebanon area has helped to keep poverty below average in southern Orange County and most of eastern Windsor County. Similarly, State jobs and insurance companies have helped to keep most of Washington County out of poverty status.

The Northeast Kingdom however, particularly Orleans County, the central part of the state in Addison, western Orange and Windsor counties and much of Rutland County, as well as many towns in Windom and Bennington counties, show concentrations of persons below the poverty line.

<sup>2</sup> For statewide statistics, American Community Survey data are available for single years, rather than a five-year rolling average. The figures cited in this paragraph are based on 2015 data, as opposed to the rest of the ACS data in other sections of the program which are based on the period from 2011-2015, since town-level data are only available for the five-year period.





## 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, only funding for bus operations was considered. 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).

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 or at another point based on the level of service operated by each agency.

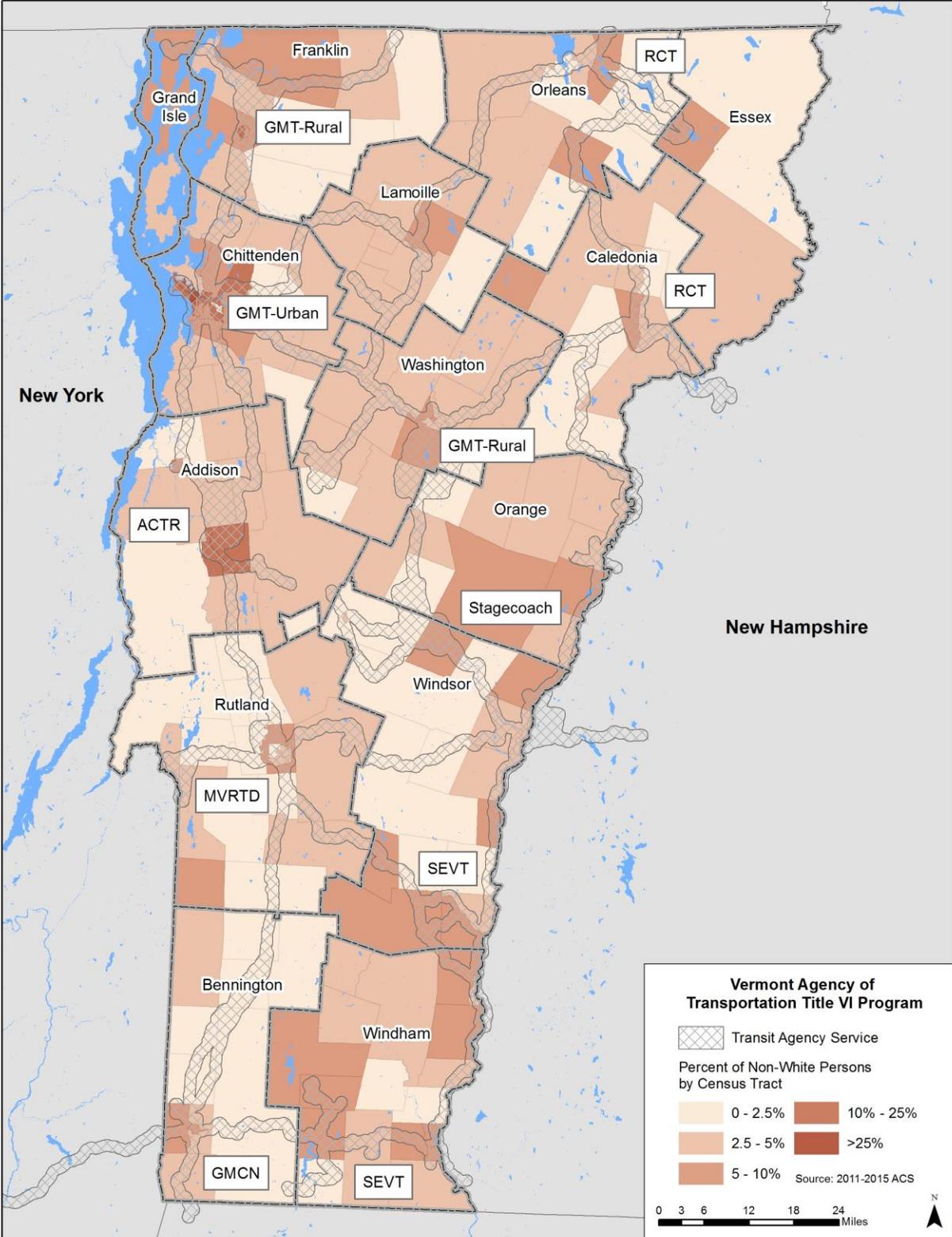
Vermont overall is overwhelmingly white. According to the 2011-2015 American Community Survey, 94.9% of the statewide population is "white only." Of the 183 Census tracts in the state, only 13 of them have minority percentages higher than 10%, and 10 of these are in the core of Chittenden County.

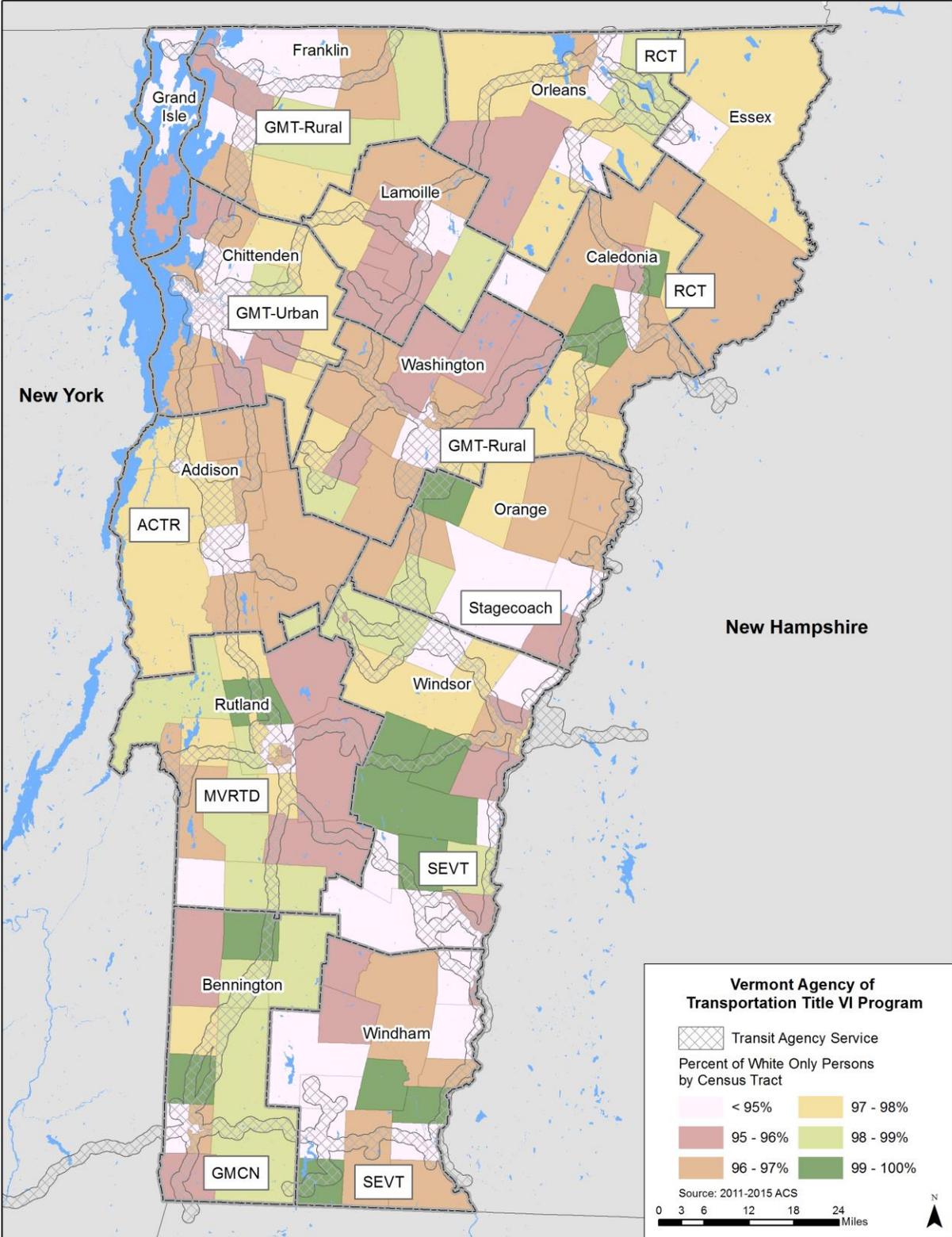
The table below compares the amount of funding for bus operations with the minority populations in their respective service areas.

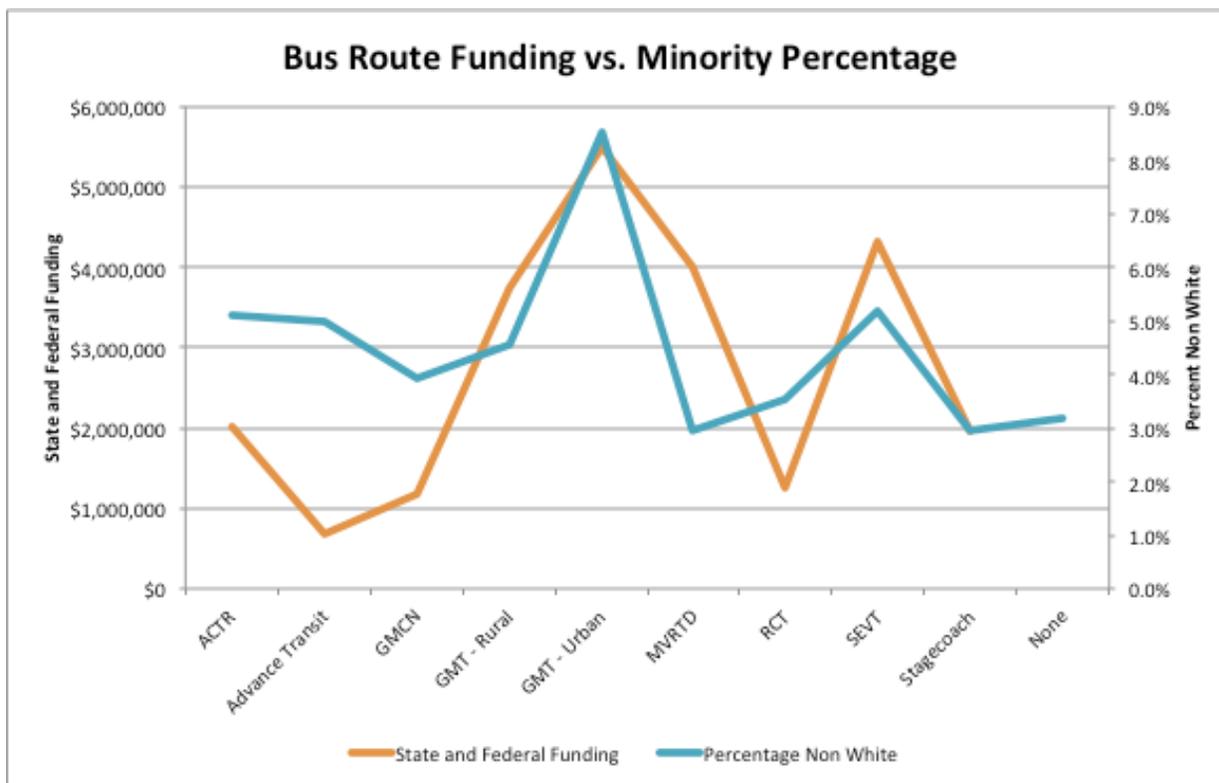
### Bus Route Service Area Racial Breakdown and Funding

Agency	Bus Route Service Area Population	White Only	Non White	Percentage White	Percentage Non White	State and Federal Funding
ACTR	36,943	35,053	1,890	94.9%	5.1%	\$2,009,476
AT	13,221	12,562	659	95.0%	5.0%	\$670,699
GMCN	32,358	31,091	1,267	96.1%	3.9%	\$1,182,266
GMT Rural	105,835	101,017	4,818	95.4%	4.6%	\$3,739,385
GMT Urban	157,797	144,392	13,405	91.5%	8.5%	\$5,482,058
MVRTD	57,032	55,350	1,682	97.1%	2.9%	\$4,006,782
RCT	66,877	64,509	2,368	96.5%	3.5%	\$1,242,643
SEVT	58,499	55,459	3,040	94.8%	5.2%	\$4,304,713
STSI	31,380	30,454	926	97.0%	3.0%	\$1,971,564
None	66,662	64,556	2,106	96.8%	3.2%	-0-
<b>TOTALS</b>	<b>626,604</b>	<b>594,443</b>	<b>32,161</b>	<b>94.9%</b>	<b>5.1%</b>	<b>\$24,609,586</b>

The data in the table above is presented in chart format below, following the maps.







### C. Disparate Impacts Analysis

The first thing to notice about the figures in the table and chart 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 2.9% to 8.5%. 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 chart above, the funding distribution by provider in general lines up very well with the 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 GMT). 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.

One final note is that the portion of the state with no bus route service ("None" in the table and chart) has close to the lowest percentage of minority individuals among all of the service areas. The fact that the area with no bus service has 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)
- Human Service Transportation Coordination Plan

The PTPP

(<http://vtrans.vermont.gov/sites/aot/files/planning/documents/planning/Vermont%20Public%20Transit%20Policy%20Plan%202012%20webs.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 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 the TPI, discussed earlier under section IV, the Public Participation Plan.

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.

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:

#### **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***

Together, the VTrans Office of Civil Rights and the VTrans Public Transit Division provide guidance and technical assistance to subrecipients related to Title VI in a number of ways. VTrans provides training on Title VI regulations and materials to help subrecipients fulfill their Title VI obligations. Over the past three years, VTrans has offered consultant services to subrecipients as well.

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 three years:

- **Title VI Training and Dissemination of Information:** In March of 2016, VTrans co-presented a training with its consultant to provide the Vermont public transit

providers the latest guidance from FTA and review Title VI Program requirements. Material covered included:

- Overview of the VTrans Title VI Program
  - New Requirements
  - Subrecipient Title VI Program Elements
  - Deadlines and Monitoring
- **Website Resources:** The VTrans Civil Rights and Labor Compliance Title VI website (<http://vtrans.vermont.gov/civil-rights/compliance/titlevi>) contains a wealth of information and resources for its subrecipients on the [Subrecipient Center page](#). This includes links to a [data collection tool kit](#) (a systematic guide to data collection and links to multiple resources) and [Environmental Justice Policy Guidance for FTA Recipients](#) found on the FTA website.
  - **Technical Support:** The VTrans Title VI Program Coordinator has reviewed and provided feedback to the public transit providers about their Title VI program plans.
  - **Language Assistance:** Recently, VTrans entered into a contract with a new translation service and has discontinued its contracts with two others. In light of this, new materials and instructions on how to access this new service were provided to the transit providers. This new information also generated questions from the providers to which VTrans responded with the necessary information to help them through this transition period.
  - **Other Technical Assistance Provided by VTrans Consultant:** VTrans works with a consultant who provides training and technical assistance to transit providers with respect to their Title VI and EEO Programs. He has provided the following assistance:

July 2016 –	Title VI Program for ACTR
August 2016 –	Title VI Program for STSI Title VI Program for MVRTD Review of EEO Program for SEVT
September 2016 –	Title VI Program for RCT
January 2017 –	Review of Title VI Program for AT
May 2017 –	Review of Title VI Program for SEVT
June 2017 –	Title VI Program for TVT
In Progress -	EEO Program for MVRTD EEO Program for TVT

In providing technical assistance to its subrecipients, VTrans follows the following procedure 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.

