



VERMONT

AGENCY OF TRANSPORTATION

**Federal Transit
Administration
Title VI / Environmental
Justice Program
2020**

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Office of Civil Rights & Labor Compliance
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**Submitted By:
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**FEDERAL TRANSIT ADMINISTRATION
TITLE VI / ENVIRONMENTAL JUSTICE PROGRAM 2020**

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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, Agency of Transportation

May 14, 2020

Date

II. Notification of Title VI Protections

VTrans maintains the [Title VI Nondiscrimination Statement](#) regarding Title VI protections on its website.

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



VTrans Office of Civil Rights and 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 802.249-9291. 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 is 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, the 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
219 North Main Street
Barre, VT 05641

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

Phone: 802.249.9291
Fax: 802.479.5506

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.

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 a Complaint Form (see Page 5).
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 5th 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.



VTrans Office of Civil Rights and Labor Compliance

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
219 North Main Street
Barre, VT 05641

Phone: 802.249.9291
Email: 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 2017.

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, including translation services for LEP persons, will be made for members of the public who request them. The public meetings discuss: 1) needed amendments to the current year's STIP, arising either from legislative action or from other causes; and 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.

Public Transit Policy Plan. VTrans recently completed the 2020 Public Transit Policy Plan which incorporated the federally-required Human Service Transportation Coordination Plan. This project incorporated extensive public outreach including eleven regional forums, two interactive online surveys with more than 3,300 total responses, stakeholder interviews, and numerous presentations to regional and statewide committees.

Other Planning Efforts. VTrans conducts other periodic statewide planning efforts related to public transportation. Separate public involvement plans are developed for each of these planning projects in cooperation with contractors who perform the studies.

Public Outreach Plan. VTrans published its comprehensive [*Public Involvement Guide*](#) in June 2017.

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 Two and Four 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 IX.

Public Meeting	Date	Location	Title VI Concentration
Public Transit Advisory Council, open to the public	6/15/17	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	9/21/17	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	12/14/17	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	3/15/18	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	6/21/18	VTrans headquarters, Montpelier	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	9/20/18	VTrans headquarters, Barre	Montpelier and Barre, transit accessible
Public Transit Policy Plan Regional Forum	10/24/18	NW Counseling Services, St. Albans	St. Albans, transit accessible
Public Transit Policy Plan Regional Forum	10/30/18	Addison County RPC, Middlebury	Middlebury, transit accessible
Public Transit Policy Plan Regional Forum	10/30/18	Town Offices, Randolph	Randolph, transit accessible
Public Transit Policy Plan Regional Forum	11/1/18	Town Welcome Center, Windsor	Windsor
Public Transit Policy Plan Regional Forum	11/1/18	The Current Offices, Rockingham	Rockingham and Brattleboro, transit accessible
Public Transit Policy Plan Regional Forum	11/14/18	Town Office, Hyde Park	Morrisville and Hyde Park
Public Transit Policy Plan Regional Forum	11/14/18	Catamount Arts, St. Johnsbury	St. Johnsbury, transit accessible
Public Transit Policy Plan Regional Forum	11/28/18	Chittenden County RPC, Winooski	Core of Chittenden County, transit accessible
Public Transit Policy Plan Regional Forum	11/28/18	Town Office, Waterbury	Stowe, Waterbury, Montpelier, transit accessible
Public Transit Advisory Council, open to the public	12/13/18	VTrans headquarters, Barre	Montpelier and Barre, transit accessible
Public Transit Policy Plan Regional Forum	12/14/18	Rutland RPC Office, Rutland	Rutland, transit accessible
Public Transit Policy Plan Regional Forum	12/18/18	VT Dept of Health, Bennington	Bennington, transit accessible
Public Transit Advisory Council, open to the public	3/21/19	VTrans headquarters, Barre	Montpelier and Barre, transit accessible

Public Meeting	Date	Location	Title VI Concentration
Public Transit Advisory Council, open to the public	6/20/19	VTrans headquarters, Barre	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	9/19/19	VTrans headquarters, Barre	Montpelier and Barre, transit accessible
Public Transit Advisory Council, open to the public	12/12/19	VTrans headquarters, Barre	Montpelier and Barre, transit accessible

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

In 2020 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 2013-2017 American Community Survey, 8,266 residents of the state of Vermont ages 5 or older spoke English less than very well, representing 1.39% of the population. The largest language-group among these LEP persons was French with 1,364 LEP individuals, reflecting French-Canadians who are most commonly represented in rural areas across the northern tier of Vermont. Other Indic Language speakers were the second largest group, with 1,130 LEP individuals, reflecting the large influx of Bhutanese refugees into the Burlington metropolitan area over the past 12 years. Spanish speakers were the third largest group, with 1,086 LEP individuals. Many of the Spanish speakers are migrant farmworkers in the rural areas of the state. The only other language group with more than 450 individuals is

Chinese, with 893. Maps and tables presented below show the number and percentages of LEP persons by tract for all languages combined, and then by tract for each of the top four languages with LEP. Other efforts to identify LEP persons besides the use of Census data are described below.

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 two primary 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 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 seven 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 five 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.

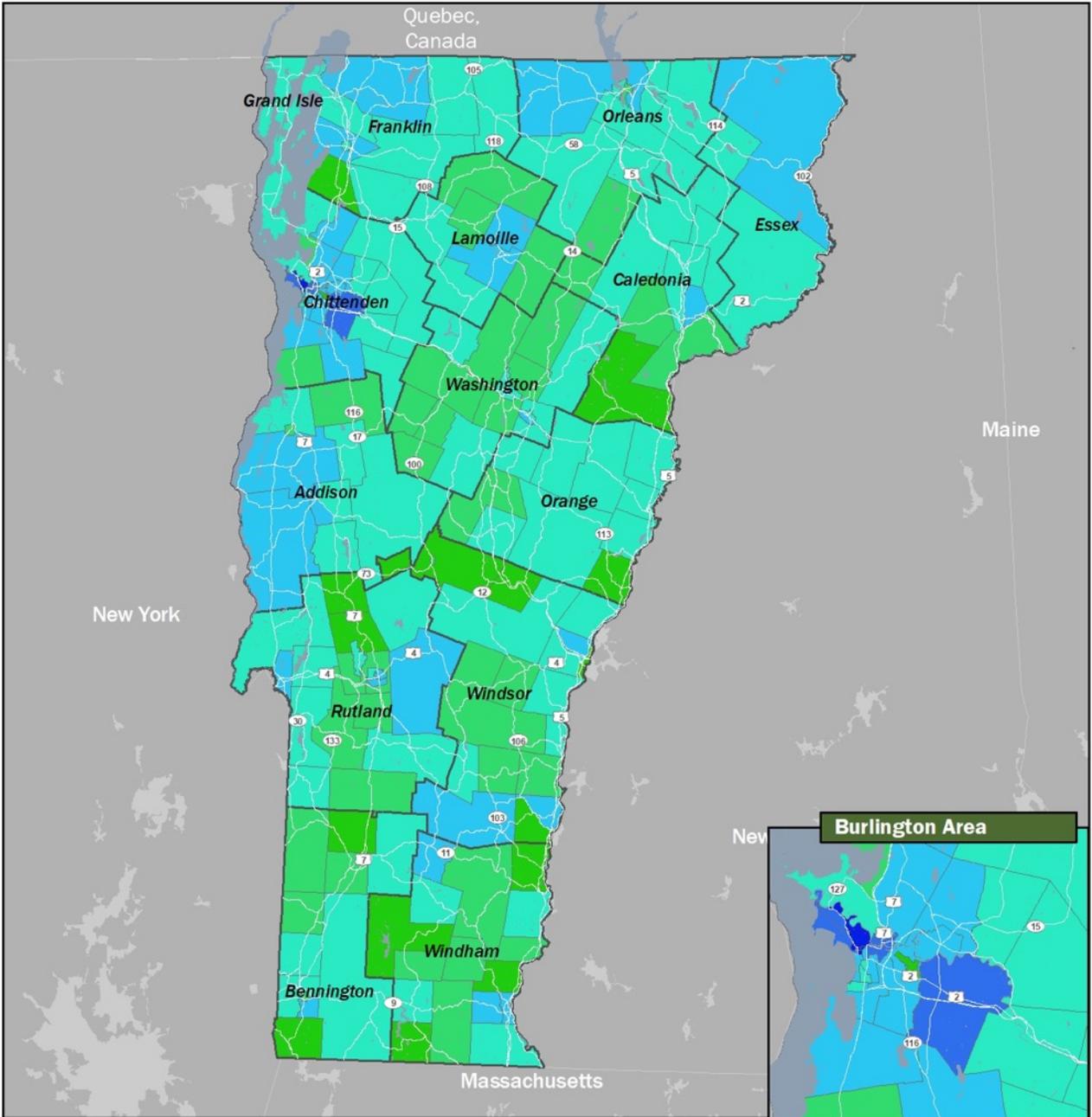
The forms of LEP interaction experienced by the transit providers include the following:

- 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.

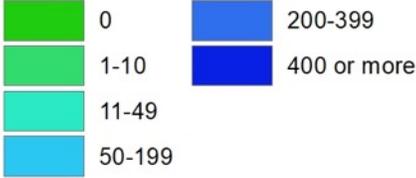
The maps presented on pages 16-17 illustrate where LEP individuals reside in the state of Vermont. The maps use Census tracts and are based on 2011-2015 American Community Survey data, the most recent available at the tract level. The first map shows the number of individuals by tract who speak English "less than very well." In 17 of the 184 Census tracts in Vermont, there are zero people who are "linguistically isolated" (i.e. speaking English less than very well). In another 40 tracts, 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, 137 of Vermont's 184 tracts

(74%) have fewer than 50 LEP individuals. There were only eight tracts with more than 200 LEP individuals; all of these were in Chittenden County. The second map shows tracts where the percentage of LEP individuals is higher than the 2011-2015 statewide average of 1.44%; i.e. "concentrations" of LEP individuals.

Linguistically Isolated Populations

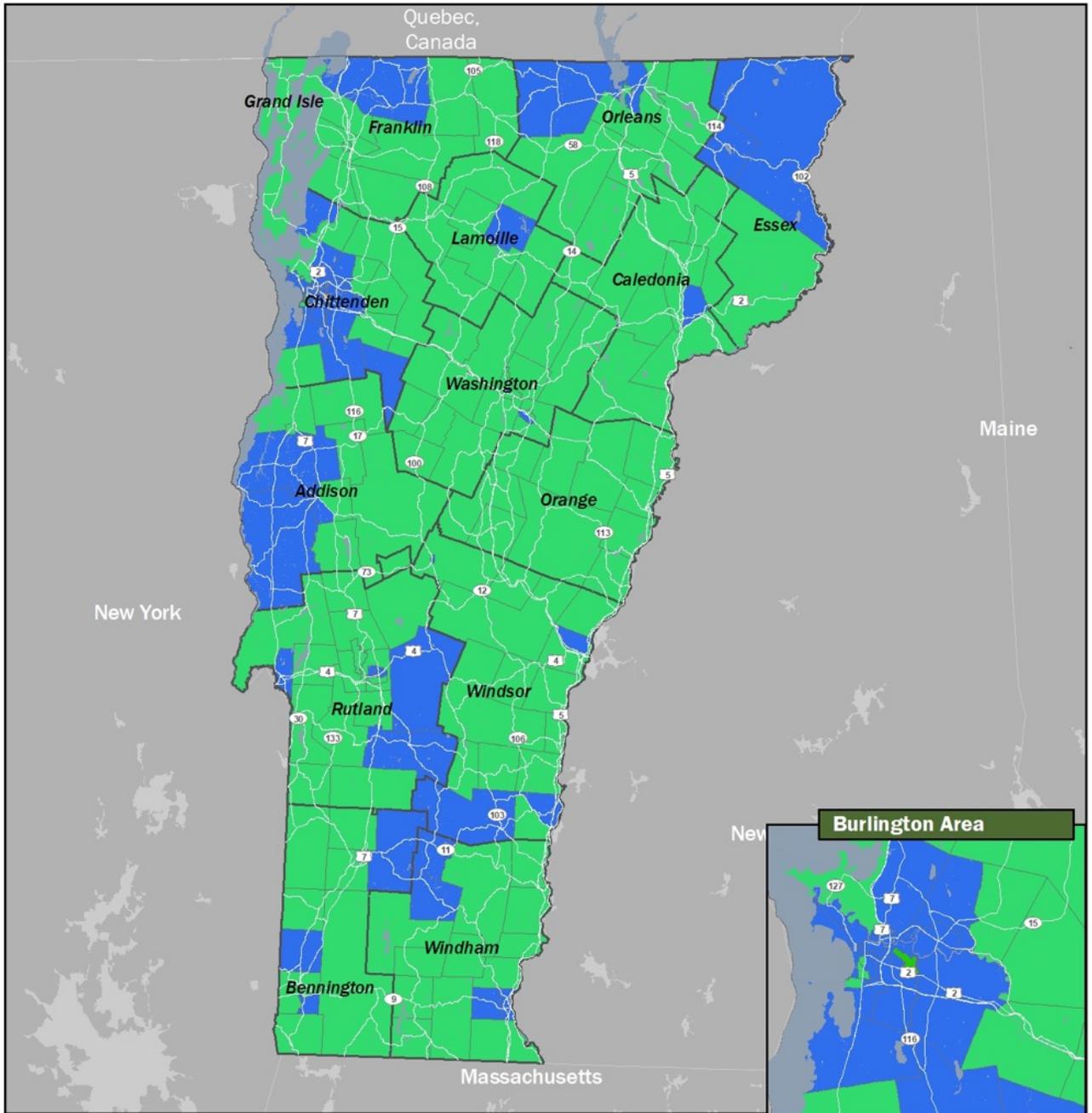


Number of Linguistically Isolated Persons, by Census Tract

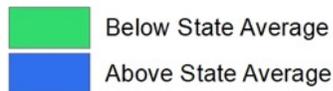


Source: 2011-2015 ACS

Linguistically Isolated Populations



Linguistically Isolated Persons as a Percentage of Population, by Census Tract



Source: 2011-2015 ACS

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 five tracts where there are 100 or more people who don't speak English very well, and three of those encompass multiple towns in Addison, Lamoille and Orleans counties, respectively. Hyde Park, with a cluster of Spanish speakers, and the northeastern section of Rutland with small clusters of a variety of languages, are the only two small tracts with more than 100 linguistic isolates outside of Chittenden County.

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 previous maps, it can be seen that at the tract 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.

The maps on pages 19 -22 display the number of persons who speak English "less than very well" and whose primary language is French, Spanish, Other Indic Languages, or Chinese. Statewide, these are the only languages that have more than 700 individuals who speak English less than very well.

On the French map (1,570 total linguistic isolates), 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 tracts have more than 40 French-speaking individuals who speak English less than very well. The highest concentrations are 5% in sparsely populated northern Essex County and 3.1% in the western part of the Town of Derby. 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.

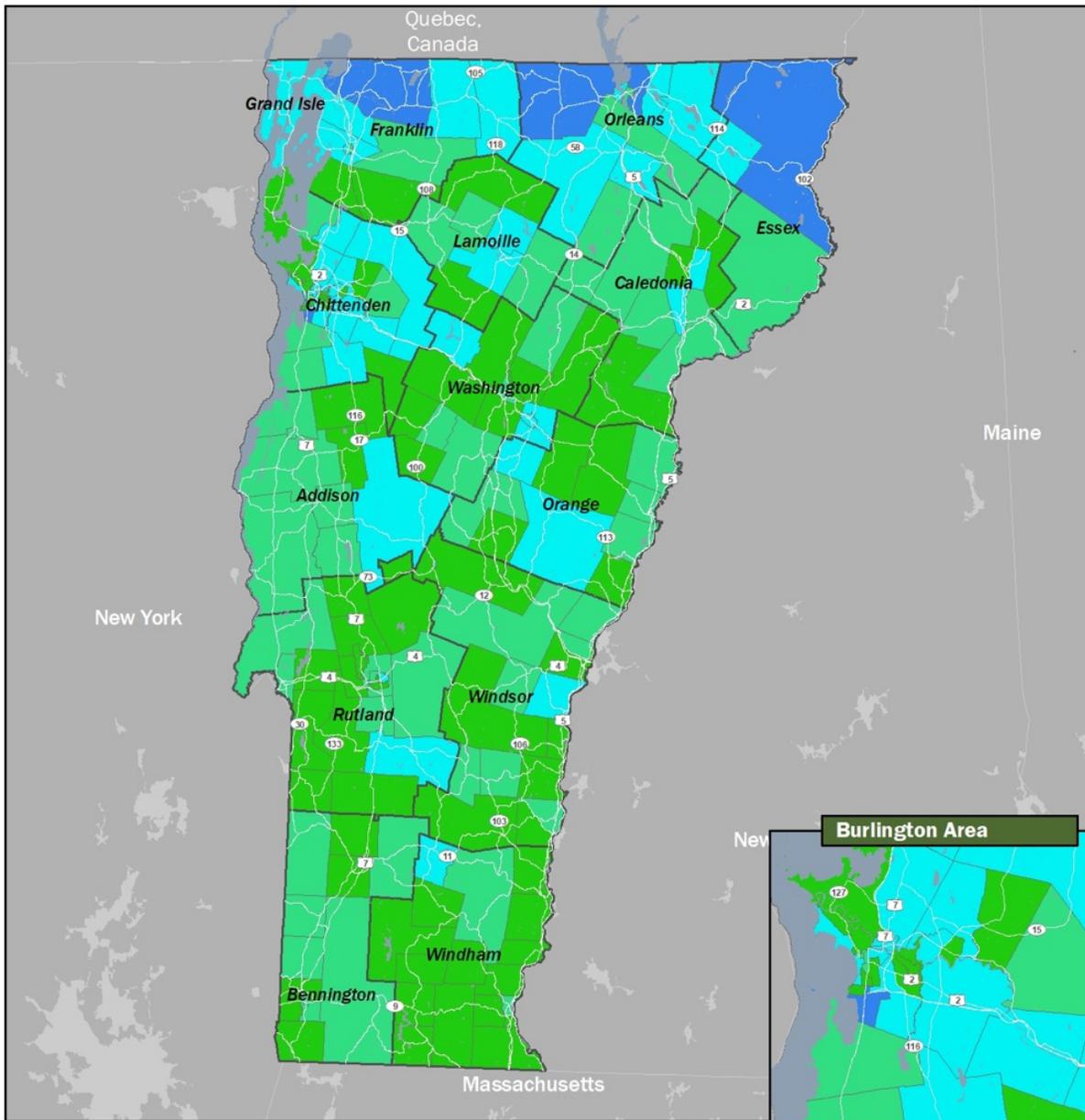
On the Spanish map (1,359 total linguistic isolates), it can be seen that the tracts with largest number of Spanish speakers are located in Addison, Franklin and Lamoille counties, though Chittenden County has the largest total number of linguistically isolated Spanish speakers. The tracts with the highest percentages of LI individuals include Hyde Park in Lamoille County (4.1%), Peru/Winhall in Bennington County (2.9%) and Huntington in Chittenden County (2.5%). The concentrations of Spanish speakers in these areas likely represent the presence of migrant farmworkers.

Other Indic Languages, spoken by 939 linguistically isolated individuals, represents the many refugees from Bhutan that settled in Chittenden County from 2008 to 2017 (see Factor 2 below). These individuals are located exclusively in the core of Chittenden County (thus the rest of the state is not shown on that map). These former refugees account for 10.8% of the population in the Intervale neighborhood of Burlington and 6.6% of the population in the Old North End neighborhood.

Finally, on the Chinese map (720 total linguistic isolates), it can be seen that linguistically isolated Chinese speakers are clustered in tracts in Chittenden, Caledonia, and Rutland counties, with smaller numbers in Windham and Windsor counties. More than half of the total number resides in Chittenden County and the highest concentrations are in the Route 116 corridor in South Burlington and the Town of Fair Haven, both just over 2% of the population.

Information about all other languages spoken in Vermont is shown on the multi-page tables 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.

Linguistically Isolated Populations

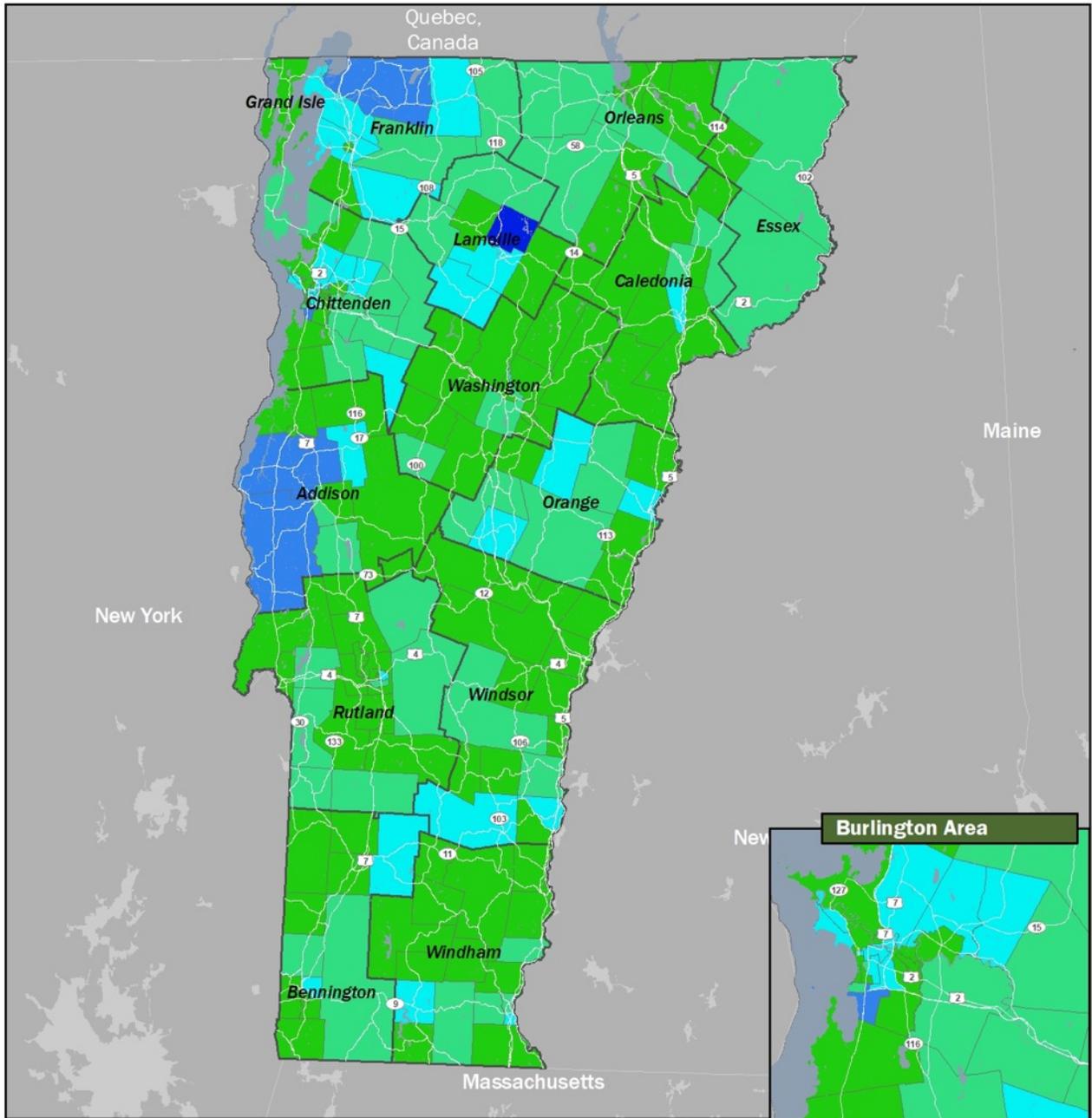


Number of Linguistically Isolated French Speakers, by Census Tract

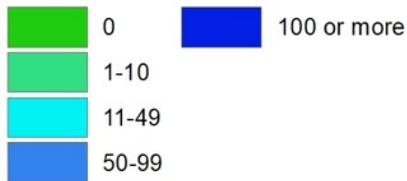


Source: 2011-2015 ACS

Linguistically Isolated Populations

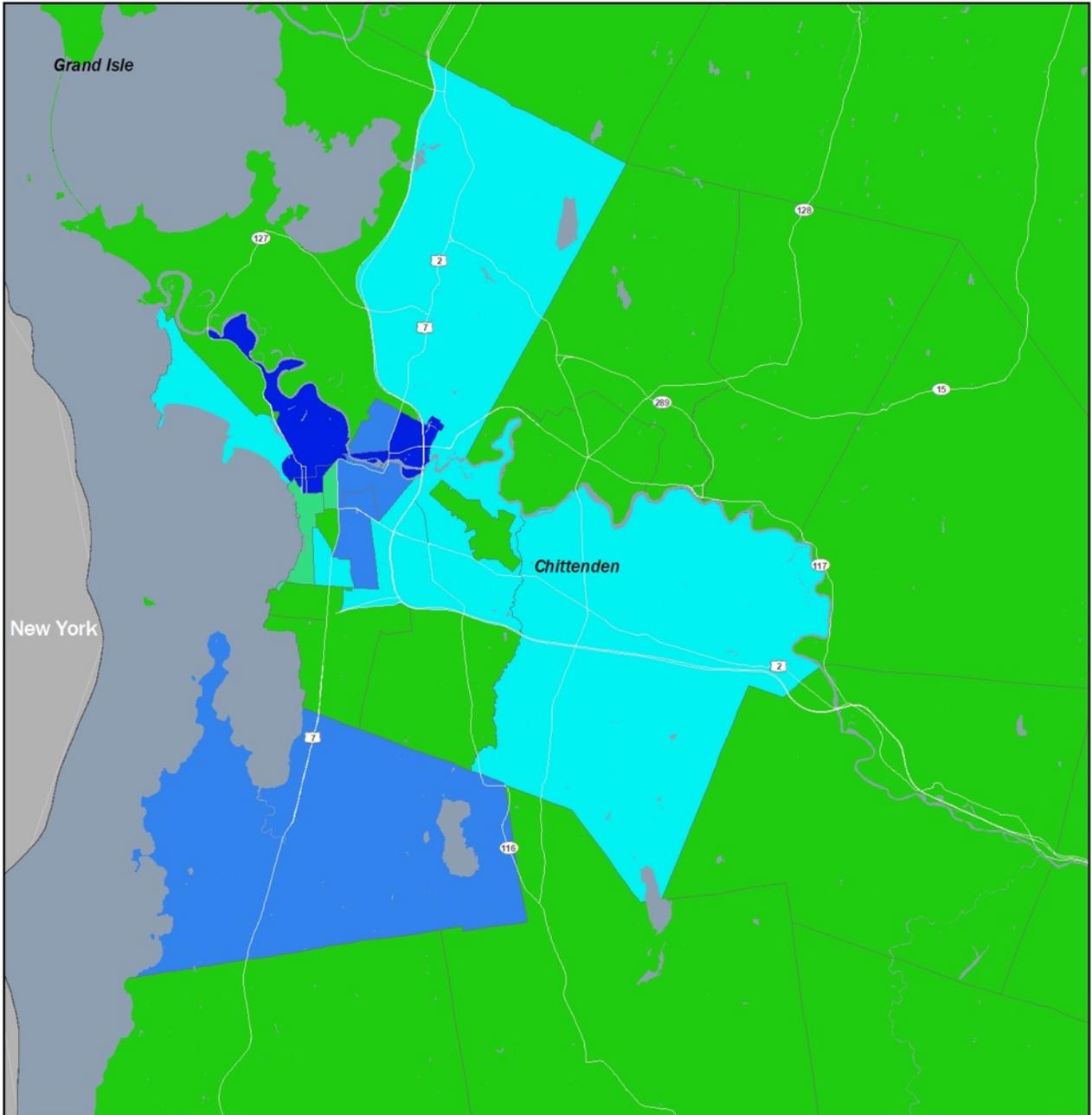


Number of Linguistically Isolated Spanish Speakers, by Census Tract

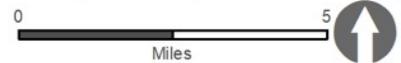
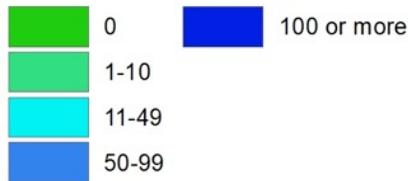


Source: 2011-2015 ACS

Linguistically Isolated Populations

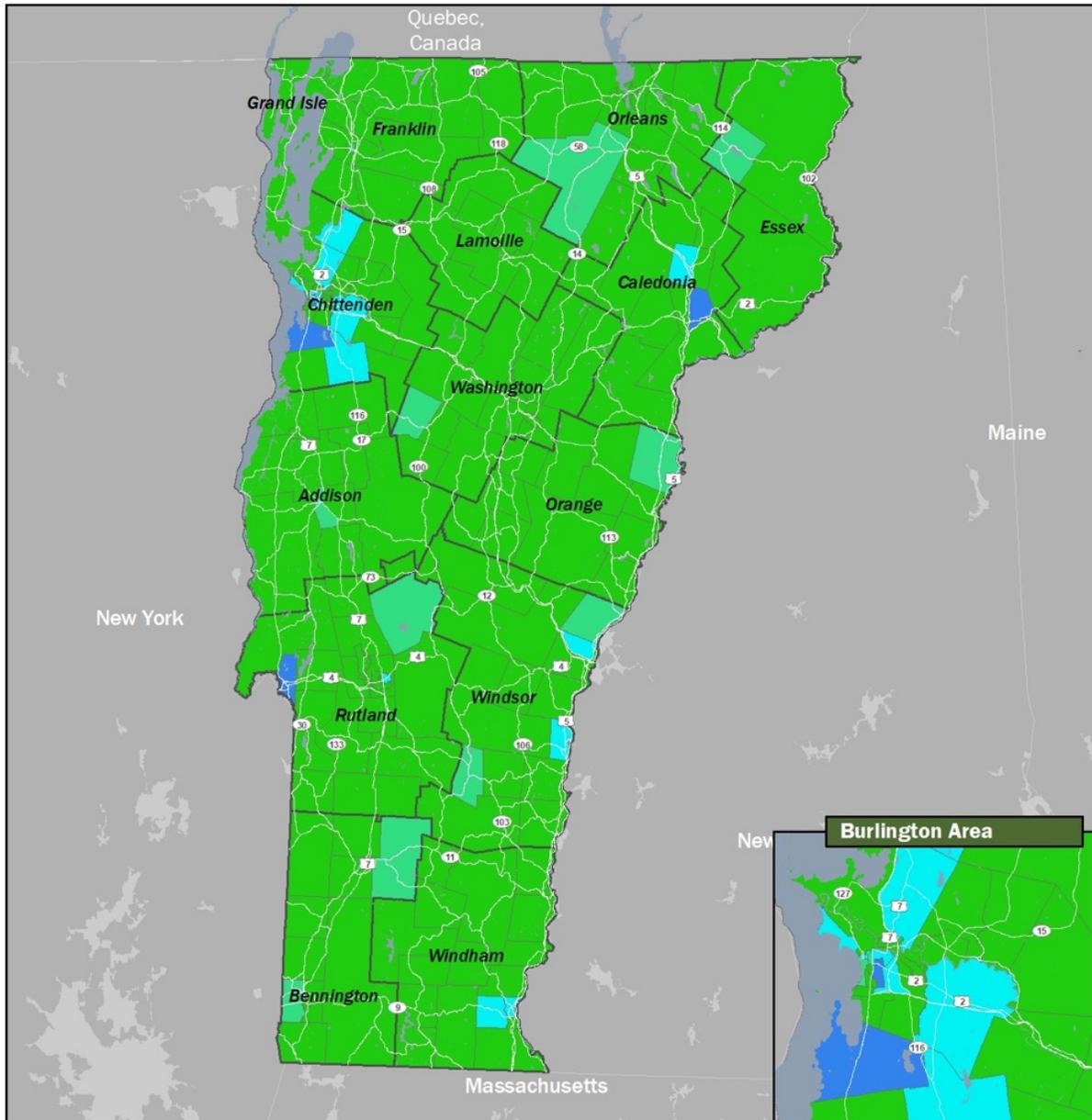


Number of Linguistically Isolated Speakers of Indic Languages, by Census Tract

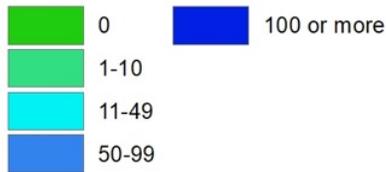


Source: 2011-2015 ACS

Linguistically Isolated Populations



Number of Linguistically Isolated Chinese Speakers, by Census Tract



Source: 2011-2015 ACS

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

County	Tract	Total Population 5+	Spanish or Spanish Creole	French (incl. Patois, Cajun)	French Creole	Italian	Portuguese or Portuguese Creole	German	Yiddish	Other West Germanic languages	Scandinavian languages	Greek	Russian	Polish	Serbo-Croatian	Other Slavic languages	Persian	Hindi	Urdu	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Hungarian	Arabic	African languages	Other and unspecified languages	Total Linguistic Isolates	
Addison	9601	3,617	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	3	
Addison	9602	2,704	-	5	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	11	
Addison	9603	2,491	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	2	
Addison	9604	4,846	83	2	-	-	-	-	-	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	97	
Addison	9605	3,709	21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	21	
Addison	9606	2,584	-	11	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	14	
Addison	9607	3,732	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13	-	-	5	-	-	-	-	-	-	-	25	
Addison	9608	4,539	8	3	-	4	-	-	-	-	-	-	4	5	22	-	-	-	15	-	-	5	-	-	-	-	-	-	-	-	-	-	-	-	66	
Addison	9609	4,877	86	8	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	3	3	-	-	-	-	-	-	-	-	9	-	111	
Addison	9610	2,271	7	4	-	-	-	-	-	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	20	
Bennington	9702	2,088	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
Bennington	9703	1,018	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	2	-	6	
Bennington	9704	4,025	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-	-	-	4	
Bennington	9705	967	28	2	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	35	
Bennington	9706	2,934	3	4	-	-	-	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	13	
Bennington	9707	2,323	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	
Bennington	9708	3,368	9	4	-	4	-	24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-	-	-	-	46	
Bennington	9709	1,923	24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	24	
Bennington	9710	3,746	-	-	-	-	-	20	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	20	-	-	-	-	-	-	-	44	
Bennington	9711	4,418	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	55	-	-	-	-	-	-	-	-	-	-	-	-	62
Bennington	9712	4,763	-	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	
Bennington	9713	3,290	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
Caledonia	9570	4,017	-	3	-	-	1	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	3	1	-	-	-	-	-	-	-	-	-	-	11	
Caledonia	9571	1,894	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	3	-	-	-	-	-	-	-	-	-	-	-	3	-	12	
Caledonia	9572	2,476	-	19	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	19	
Caledonia	9573	3,157	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	14	-	-	-	-	-	-	-	-	-	-	-	-	-	19
Caledonia	9574	3,573	16	20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	36	
Caledonia	9575	3,654	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	62	-	-	-	-	-	-	-	-	-	-	-	-	-	65
Caledonia	9576	2,070	-	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	
Caledonia	9577	2,816	-	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8	
Caledonia	9578	2,761	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
Caledonia	9579	3,029	-	3	-	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8	

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

County	Tract	Total Population 5+	Spanish or Spanish Creole	French (incl. Patois, Cajun)	French Creole	Italian	Portuguese or Portuguese Creole	German	Yiddish	Other West Germanic languages	Scandinavian languages	Greek	Russian	Polish	Serbo-Croatian	Other Slavic languages	Persian	Hindi	Urdu	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Hungarian	Arabic	African languages	Other and unspecified languages	Total Linguistic Isolates		
Chittenden	1	4,032	33	-	-	-	-	-	-	-	-	-	-	-	160	-	-	-	-	-	-	-	-	-	-	-	166	-	-	-	-	-	-	-	359		
Chittenden	2	5,360	14	38	-	-	14	-	-	-	-	-	17	-	69	-	-	-	-	-	38	11	-	-	-	-	-	-	-	-	-	-	-	21	-	237	
Chittenden	3	3,429	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	372	-	-	-	-	-	-	175	-	15	-	-	-	-	101	-	648
Chittenden	4	3,264	24	4	-	-	-	-	-	-	-	24	-	-	-	-	-	-	-	-	217	-	16	-	-	22	8	21	-	-	-	-	6	60	-	402	
Chittenden	5	4,437	25	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	-	-	-	-	63	-	-	-	-	-	-	-	-	102	
Chittenden	6	4,947	31	15	-	18	-	-	-	-	-	-	-	7	-	-	-	-	-	-	56	-	20	-	17	29	-	-	-	-	-	-	-	24	-	217	
Chittenden	8	2,582	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13	-	-	-	-	-	-	-	-	-	-	-	-	14	-	27	
Chittenden	9	2,569	2	8	-	-	-	-	-	-	-	-	16	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	29	
Chittenden	10	2,280	-	14	-	12	-	-	-	-	-	-	30	-	-	-	-	-	-	-	-	-	-	-	-	-	33	-	-	-	-	-	-	28	-	121	
Chittenden	11	2,049	1	-	-	-	-	-	-	-	-	-	-	-	13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	14	
Chittenden	21.01	2,570	7	8	-	-	-	8	-	-	-	-	-	18	-	-	-	-	-	-	-	-	-	8	-	-	-	-	-	-	-	-	-	-	-	49	
Chittenden	21.02	7,309	-	16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	30	-	-	-	-	27	-	-	-	-	-	-	-	-	73	
Chittenden	22	7,949	27	13	-	-	-	-	-	-	-	-	-	-	49	-	-	-	-	-	-	1	24	-	-	1	-	-	-	-	-	-	14	-	-	129	
Chittenden	23.01	2,186	-	-	-	-	-	-	-	-	-	-	1	-	-	4	-	-	-	-	-	-	-	-	-	-	-	-	-	5	-	-	-	-	-	10	
Chittenden	23.02	6,324	-	-	-	-	-	-	-	-	-	-	33	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	33	
Chittenden	24	2,829	-	19	-	-	-	-	-	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	22	-	-	-	-	-	164	43	-	331	
Chittenden	25	3,835	16	21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	183	-	-	-	-	11	20	-	-	-	-	-	4	-	-	255	
Chittenden	26.01	5,066	-	30	-	-	-	-	-	-	-	-	-	-	-	-	-	27	-	-	-	-	-	-	-	-	48	-	-	-	-	-	6	-	-	111	
Chittenden	26.02	4,089	-	-	-	-	-	-	-	-	-	-	-	-	28	-	-	-	-	-	-	-	-	-	-	-	22	-	-	-	-	-	11	8	-	69	
Chittenden	27.01	5,439	11	13	-	-	-	-	-	-	-	-	-	-	10	-	-	-	-	-	-	-	-	-	-	-	47	-	-	-	-	-	-	-	-	81	
Chittenden	27.02	4,753	17	-	-	-	-	-	-	-	-	-	11	-	-	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	39	
Chittenden	28	4,742	5	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13	
Chittenden	29	6,048	9	16	-	-	-	-	-	9	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	41	
Chittenden	30	3,939	7	12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	19	
Chittenden	31	8,493	4	43	-	-	-	20	-	-	-	-	18	-	-	-	-	-	-	-	-	18	-	-	35	-	-	-	27	-	-	66	-	-	-	231	
Chittenden	33.01	3,584	-	33	-	-	-	-	-	-	-	-	21	-	-	-	21	-	-	-	-	78	-	-	-	-	18	-	-	-	-	-	11	-	-	182	
Chittenden	33.04	5,759	55	70	-	-	-	-	-	-	-	-	16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	141	
Chittenden	34	7,241	-	4	-	17	42	-	-	-	-	-	-	-	-	-	15	-	-	-	-	86	-	-	-	-	-	-	-	-	-	-	-	-	-	164	
Chittenden	35.01	3,646	-	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	
Chittenden	35.02	4,874	4	17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	26	-	-	-	-	-	46	-	-	-	-	-	-	-	93	
Chittenden	35.03	1,810	45	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	48	
Chittenden	36	3,970	13	12	-	-	-	-	-	-	-	-	-	-	11	-	-	-	-	-	50	20	-	-	-	-	-	-	-	-	-	-	-	-	-	106	
Chittenden	39	6,242	11	-	-	-	-	4	-	-	-	-	3	-	-	-	-	-	-	-	-	65	-	-	-	-	4	-	-	-	-	-	-	-	-	87	
Chittenden	40.02	4,251	-	-	-	-	-	13	-	-	-	-	-	12	-	-	-	-	-	-	21	-	-	-	19	-	20	-	-	-	-	-	-	52	-	137	

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

County	Tract	Total Population 5+	Spanish or Spanish Creole	French (incl. Patois, Cajun)	French Creole	Italian	Portuguese or Portuguese Creole	German	Yiddish	Other West Germanic languages	Scandinavian languages	Greek	Russian	Polish	Serbo-Croatian	Other Slavic languages	Persian	Hindi	Urdu	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Hungarian	Arabic	African languages	Other and unspecified languages	Total Linguistic Isolates
Essex	9501	1,886	4	94	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100
Essex	9502	922	-	13	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	16
Essex	9505	3,128	7	3	-	2	2	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16
Franklin	101	7,071	73	86	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-	-	-	-	-	169
Franklin	102	4,233	19	19	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41
Franklin	103	3,258	8	24	-	-	-	2	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	37
Franklin	104	2,934	8	8	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	19
Franklin	105	6,002	22	16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	38
Franklin	106	5,886	34	26	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	63
Franklin	107	3,176	-	17	-	-	-	-	-	-	-	-	-	16	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8	-	-	-	-	41
Franklin	108	3,187	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	13
Franklin	109	4,369	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Franklin	110	5,446	15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	17
Grand Isle	201	3,070	-	19	-	-	-	5	-	-	-	-	1	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	27
Grand Isle	202	3,588	2	-	-	-	4	-	-	-	5	-	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15
Lamoille	9530	2,255	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
Lamoille	9531	3,418	10	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12
Lamoille	9532	3,279	-	2	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3
Lamoille	9533	2,927	119	14	-	11	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	146
Lamoille	9534	2,429	-	3	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5
Lamoille	9535	5,222	22	17	-	-	27	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	66
Lamoille	9536	4,147	17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17
Orange	9590	2,057	-	6	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-	-	-	-	-	-	-	-	11
Orange	9591.01	2,044	18	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	20
Orange	9591.02	2,359	10	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12
Orange	9592	3,230	-	12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12
Orange	9593	2,410	4	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7
Orange	9594	4,596	17	-	-	-	-	16	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	36
Orange	9595	4,161	6	24	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	33
Orange	9596	2,511	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Orange	9597	1,662	-	3	-	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-	-	-	11	-	-	-	-	-	-	-	-	-	-	-	19
Orange	9598	2,542	22	5	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	33

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

County	Tract	Total Population 5+	Spanish or Spanish Creole	French (incl. Patois, Cajun)	French Creole	Italian	Portuguese or Portuguese Creole	German	Yiddish	Other West Germanic languages	Scandinavian languages	Greek	Russian	Polish	Serbo-Croatian	Other Slavic languages	Persian	Hindi	Urdu	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Hungarian	Arabic	African languages	Other and unspecified languages	Total Linguistic Isolates
Orleans	9511	2,251	-	17	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	19
Orleans	9512	2,722	-	26	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	2	-	-	-	-	31
Orleans	9513	1,655	-	52	-	-	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	59
Orleans	9514	1,924	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7
Orleans	9515	2,357	-	43	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	43
Orleans	9516	4,404	6	83	-	-	-	3	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	10	106
Orleans	9517	3,908	7	23	-	-	-	1	-	-	-	-	-	6	-	-	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	46
Orleans	9518	2,496	-	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11
Orleans	9519	2,305	3	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13
Orleans	9520	1,750	-	3	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8
Rutland	9621	1,651	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-	-	-	-	-	-	-	-	13
Rutland	9622	3,646	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Rutland	9623	2,436	-	3	-	-	5	-	-	-	-	2	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5	-	-	-	18
Rutland	9624	2,834	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Rutland	9625	1,534	-	-	-	-	-	-	-	-	8	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11
Rutland	9626	2,260	-	-	-	4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4
Rutland	9627	3,846	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1
Rutland	9628	2,840	10	6	-	-	-	11	-	-	-	-	-	-	-	11	-	-	-	-	-	-	-	-	25	-	-	-	-	-	-	-	-	-	63
Rutland	9630	3,742	20	22	-	15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	27	19	-	-	-	-	-	-	-	-	-	12	-	115
Rutland	9631	3,286	-	-	32	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	29	-	-	-	-	61
Rutland	9632	3,114	-	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	38	-	-	-	-	-	-	-	-	-	-	-	48
Rutland	9633	5,071	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	61	-	-	-	-	-	67	
Rutland	9634	2,515	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6
Rutland	9635	1,654	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1
Rutland	9636	4,476	4	-	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	7	-	-	-	-	-	-	-	19
Rutland	9637	2,567	-	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	54	-	-	-	-	-	-	-	-	-	-	-	-	59
Rutland	9638	4,239	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	12
Rutland	9640	3,189	-	16	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	23	-	-	-	-	-	-	-	-	45
Rutland	9642	1,583	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3
Rutland	9643	1,336	3	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12

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

County	Tract	Total Population 5+	Spanish or Spanish Creole	French (Incl. Patois, Cajun)	French Creole	Italian	Portuguese or Portuguese Creole	German	Yiddish	Other West Germanic languages	Scandinavian languages	Greek	Russian	Polish	Serbo-Croatian	Other Slavic languages	Persian	Hindi	Urdu	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Hungarian	Arabic	African languages	Other and unspecified languages	Total Linguistic Isolates	
Washington	9540	4,149	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-	-	-	-	-	-	-	13	
Washington	9541	2,278	-	3	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	9	
Washington	9542	2,625	-	-	-	-	-	4	-	-	-	-	-	3	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	
Washington	9543	4,841	-	18	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	20	
Washington	9544	2,974	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	
Washington	9545	2,760	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7	
Washington	9546	2,118	-	10	-	-	-	-	-	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	5	27	
Washington	9547	1,371	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	15	
Washington	9548	2,212	-	9	-	-	-	-	-	-	-	-	-	-	59	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	68	
Washington	9549	1,565	-	4	-	-	-	4	-	-	-	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17	
Washington	9550	2,498	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-	-	-	-	-	-	-	-	4
Washington	9551	3,978	-	15	-	-	-	28	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	43	
Washington	9552	4,414	-	18	-	-	-	-	-	-	-	-	-	-	43	-	-	-	-	-	-	-	-	-	-	-	12	-	-	-	-	-	-	-	73	
Washington	9553	3,668	-	29	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	29	
Washington	9554	3,785	-	25	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	25	
Washington	9555	6,578	-	10	-	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-	-	-	22	
Washington	9556	1,511	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5	
Washington	9557	1,666	-	3	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	
Washington	9558	1,190	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	-	3
Windham	9670	2,928	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
Windham	9671	1,960	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
Windham	9672	2,945	-	3	-	-	2	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7	
Windham	9673	1,492	-	15	-	5	-	-	-	6	-	-	-	-	-	-	-	-	-	-	-	25	-	-	-	-	-	-	-	-	-	-	-	-	51	
Windham	9674	874	-	-	-	-	-	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15	-	-	23	
Windham	9675	904	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
Windham	9676	3,044	-	-	-	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11	
Windham	9677	2,582	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-	-	5	
Windham	9678	1,740	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	
Windham	9679	1,264	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	-	-	-	-	4	
Windham	9680	1,966	11	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	11	
Windham	9681	1,257	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
Windham	9682	1,882	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	
Windham	9683	1,876	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	
Windham	9684	3,545	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	27	-	-	-	33	-	-	-	-	-	-	-	-	69	
Windham	9685	5,165	31	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	38	-	-	21	-	-	-	-	9	99	
Windham	9686	2,492	9	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	26	-	-	-	-	15	-	-	-	-	-	15	-	70	
Windham	9687	3,954	-	-	-	-	-	15	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	18	

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

County	Tract	Total Population 5+	Spanish or Spanish Creole	French (incl. Patois, Cajun)	French Creole	Italian	Portuguese or Portuguese Creole	German	Yiddish	Other West Germanic languages	Scandinavian languages	Greek	Russian	Polish	Serbo-Croatian	Other Slavic languages	Persian	Hindi	Urdu	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Hungarian	Arabic	African languages	Other and unspecified languages	Total Linguistic Isolates
Windsor	9650	3,306	-	9	-	-	-	17	-	-	-	-	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-	-	-	-	-	29
Windsor	9651	2,571	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windsor	9652	2,606	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windsor	9653	282	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-	4
Windsor	9654	3,689	-	5	-	-	-	-	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12
Windsor	9655.01	3,052	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	19	-	-	5	-	-	-	-	-	-	-	24
Windsor	9655.02	2,543	-	-	-	-	-	-	-	-	-	-	7	-	-	-	-	-	-	-	-	33	-	13	-	-	-	-	-	-	-	-	-	-	53
Windsor	9656	3,778	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windsor	9657	3,205	-	27	-	-	-	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	37
Windsor	9658	2,971	-	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5
Windsor	9659	3,007	9	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9
Windsor	9660	3,289	-	-	-	-	-	14	-	-	-	-	-	-	-	-	-	-	-	-	-	15	-	-	-	2	-	-	-	-	-	-	-	-	31
Windsor	9661	2,686	6	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	
Windsor	9662	1,727	-	7	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7
Windsor	9663	2,069	-	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9	-	-	-	-	-	-	-	-	-	-	-	-	19
Windsor	9665	4,096	48	-	-	-	-	-	-	-	-	-	8	-	-	-	-	-	-	-	-	-	30	-	-	-	-	-	-	-	-	-	-	-	86
Windsor	9666	4,381	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Windsor	9667	4,327	38	9	-	2	-	-	-	-	-	31	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6	-	-	-	-	-	86
TOTALS		592,592	1,359	1,570	32	122	99	280	4	26	26	67	204	74	508	34	48	31	21	939	123	720	147	116	126	104	580	266	129	64	7	300	403	10	8,536

Source: 2011-2015 American Community Survey

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

County	Tract	Spanish or Spanish Creole	French (incl. Patois, Cajun)	Italian	Portuguese or Portuguese Creole	German	Greek	Russian	Polish	Serbo-Croatian	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Arabic	African languages	Total Linguistic Isolates
Addison	9601															0.1%								0.1%
Addison	9602		0.2%			0.2%																		0.4%
Addison	9603		0.0%									0.0%												0.1%
Addison	9604	1.7%	0.0%																					2.0%
Addison	9605	0.6%																						0.6%
Addison	9606		0.4%																					0.5%
Addison	9607		0.2%												0.3%			0.1%		0.1%				0.7%
Addison	9608	0.2%	0.1%	0.1%				0.1%	0.1%	0.5%		0.1%												1.5%
Addison	9609	1.8%	0.2%										0.1%	0.1%									0.2%	2.3%
Addison	9610	0.3%	0.2%							0.4%														0.9%
Bennington	9702																							0
Bennington	9703		0.2%													0.2%							0.2%	0.6%
Bennington	9704																	0.1%						0.1%
Bennington	9705	2.9%	0.2%					0.3%				0.2%												3.6%
Bennington	9706	0.1%	0.1%			0.1%										0.1%								0.4%
Bennington	9707		0.0%																					0.0%
Bennington	9708	0.3%	0.1%	0.1%		0.7%							0.1%											1.4%
Bennington	9709	1.2%																						1.2%
Bennington	9710					0.5%						0.1%						0.5%						1.2%
Bennington	9711		0.2%										1.2%											1.4%
Bennington	9712		0.2%																					0.2%
Bennington	9713																							0
Caledonia	9570		0.1%		0.0%				0.1%					0.1%	0.0%									0.3%
Caledonia	9571	0.1%										0.2%											0.2%	0.6%
Caledonia	9572		0.8%																					0.8%
Caledonia	9573	0.2%										0.4%												0.6%
Caledonia	9574	0.4%	0.6%																					1.0%
Caledonia	9575		0.1%									1.7%												1.8%
Caledonia	9576		0.2%																					0.2%
Caledonia	9577		0.3%																					0.3%
Caledonia	9578																							0
Caledonia	9579		0.1%					0.2%																0.3%
Chittenden	1	0.8%								4.0%								4.1%						8.9%
Chittenden	2	0.3%	0.7%		0.3%			0.3%		1.3%		0.7%	0.2%							0.3%			0.4%	4.4%
Chittenden	3										10.8%								5.1%				2.9%	18.9%
Chittenden	4	0.7%	0.1%				0.7%					6.6%	0.5%				0.7%	0.2%	0.6%			0.2%	1.8%	12.3%
Chittenden	5	0.6%	0.1%										0.2%					1.4%						2.3%
Chittenden	6	0.6%	0.3%	0.4%					0.1%			1.1%	0.4%		0.3%	0.6%							0.5%	4.4%
Chittenden	8										0.5%												0.5%	1.0%
Chittenden	9	0.1%	0.3%					0.6%							0.1%									1.1%
Chittenden	10		0.6%	0.5%				1.3%					0.2%					1.4%					1.2%	5.3%
Chittenden	11	0.0%								0.6%														0.7%
Chittenden	21.01	0.3%	0.3%			0.3%			0.7%						0.3%									1.9%
Chittenden	21.02		0.2%										0.4%					0.4%						1.0%
Chittenden	22	0.3%	0.2%							0.6%		0.0%	0.3%			0.0%						0.2%		1.6%
Chittenden	23.01							0.0%														0.2%		0.5%
Chittenden	23.02							0.5%																0.5%
Chittenden	24		0.7%							0.3%	2.6%							0.8%				5.8%	1.5%	11.7%
Chittenden	25	0.4%	0.5%								4.8%						0.3%	0.5%				0.1%		6.6%
Chittenden	26.01		0.6%																			0.1%		2.2%
Chittenden	26.02									0.7%								0.9%				0.3%	0.2%	1.7%
Chittenden	27.01	0.2%	0.2%							0.2%								0.9%						1.5%
Chittenden	27.02	0.4%						0.2%																0.8%
Chittenden	28	0.1%	0.2%																					0.3%
Chittenden	29	0.1%	0.3%							0.0%												0.1%		0.7%
Chittenden	30	0.2%	0.3%																					0.5%
Chittenden	31	0.0%	0.5%			0.2%		0.2%				0.2%			0.4%					0.3%		0.8%		2.7%
Chittenden	33.01		0.9%					0.6%				2.2%						0.5%				0.3%		5.1%
Chittenden	33.04	1.0%	1.2%					0.3%																2.4%
Chittenden	34		0.1%	0.2%	0.6%							1.2%												2.3%
Chittenden	35.01		0.3%																					0.3%
Chittenden	35.02	0.1%	0.3%									0.5%						0.9%						1.9%
Chittenden	35.03	2.5%		0.2%																				2.7%
Chittenden	36	0.3%	0.3%							0.3%	1.3%	0.5%												2.7%
Chittenden	39	0.2%				0.1%		0.0%				1.0%						0.1%						1.4%
Chittenden	40.02					0.3%			0.3%		0.5%					0.4%		0.5%					1.2%	3.2%

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

County	Tract	Spanish or Spanish Creole	French (incl. Patois, Cajun)	Italian	Portuguese or Portuguese Creole	German	Greek	Russian	Polish	Serbo-Croatian	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Arabic	African languages	Total Linguistic isolates	
Essex	9501	0.2%	5.0%		0.1%																			5.3%	
Essex	9502		1.4%										0.3%												1.7%
Essex	9505	0.2%	0.1%	0.1%	0.1%	0.1%																			0.5%
Franklin	101	1.0%	1.2%			0.0%										0.1%									2.4%
Franklin	102	0.4%	0.4%			0.1%																			1.0%
Franklin	103	0.2%	0.7%			0.1%			0.1%																1.1%
Franklin	104	0.3%	0.3%	0.1%																					0.6%
Franklin	105	0.4%	0.3%																						0.6%
Franklin	106	0.6%	0.4%																						1.1%
Franklin	107		0.5%						0.5%												0.3%				1.3%
Franklin	108		0.2%										0.2%												0.4%
Franklin	109																								0
Franklin	110	0.3%												0.0%											0.3%
Grand Isle	201		0.6%			0.2%		0.0%		0.1%															0.9%
Grand Isle	202	0.1%			0.1%			0.1%																	0.4%
Lamoille	9530	0.3%																							0.3%
Lamoille	9531	0.3%	0.1%																						0.4%
Lamoille	9532		0.1%			0.0%																			0.1%
Lamoille	9533	4.1%	0.5%	0.4%																					5.0%
Lamoille	9534		0.1%			0.1%																			0.2%
Lamoille	9535	0.4%	0.3%		0.5%																				1.3%
Lamoille	9536	0.4%																							0.4%
Orange	9590		0.3%			0.0%							0.2%												0.5%
Orange	9591.01	0.9%																							1.0%
Orange	9591.02	0.4%	0.1%																						0.5%
Orange	9592		0.4%																						0.4%
Orange	9593	0.2%	0.1%																						0.3%
Orange	9594	0.4%				0.3%				0.1%															0.8%
Orange	9595	0.1%	0.6%																			0.1%			0.8%
Orange	9596																								0
Orange	9597		0.2%				0.3%						0.7%												1.1%
Orange	9598	0.9%	0.2%			0.2%																			1.3%
Orleans	9511		0.8%																						0.8%
Orleans	9512		1.0%																		0.1%	0.1%			1.1%
Orleans	9513		3.1%			0.4%																			3.6%
Orleans	9514		0.4%																						0.4%
Orleans	9515		1.8%																						1.8%
Orleans	9516	0.1%	1.9%			0.1%	0.0%								0.0%										2.4%
Orleans	9517	0.2%	0.6%			0.0%			0.2%				0.2%												1.2%
Orleans	9518		0.4%																						0.4%
Orleans	9519	0.1%	0.4%																						0.6%
Orleans	9520		0.2%																						0.5%
Rutland	9621	0.4%											0.4%												0.8%
Rutland	9622																								0
Rutland	9623		0.1%		0.2%		0.1%	0.1%																	0.7%
Rutland	9624																								0
Rutland	9625						0.2%																		0.7%
Rutland	9626			0.2%																					0.2%
Rutland	9627		0.0%																						0.0%
Rutland	9628	0.4%	0.2%			0.4%										0.9%									2.2%
Rutland	9630	0.5%	0.6%	0.4%									0.7%	0.5%									0.3%		3.1%
Rutland	9631																					0.9%			1.9%
Rutland	9632		0.3%										1.2%												1.5%
Rutland	9633	0.1%																			1.2%				1.3%
Rutland	9634		0.2%																						0.2%
Rutland	9635								0.1%																0.1%
Rutland	9636	0.1%				0.1%									0.0%		0.2%								0.4%
Rutland	9637		0.2%										2.1%			0.0%									2.3%
Rutland	9638	0.2%																0.1%							0.3%
Rutland	9640		0.5%			0.2%												0.7%							1.4%
Rutland	9642	0.2%																							0.2%
Rutland	9643	0.2%		0.7%																					0.9%

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

County	Tract	Spanish or Spanish Creole	French (incl. Patois, Cajun)	Italian	Portuguese or Portuguese Creole	German	Greek	Russian	Polish	Serbo-Croatian	Other Indic languages	Other Indo-European languages	Chinese	Japanese	Korean	Thai	Laotian	Vietnamese	Other Asian languages	Tagalog	Other Pacific Island languages	Arabic	African languages	Total Linguistic Isolates
Washington	9540					0.1%							0.2%							0.1%				0.3%
Washington	9541		0.1%			0.1%										0.1%								0.4%
Washington	9542					0.2%			0.1%															0.4%
Washington	9543		0.4%							0.0%														0.4%
Washington	9544									0.1%														0.1%
Washington	9545	0.3%																						0.3%
Washington	9546		0.5%							0.4%								0.1%					0.2%	1.3%
Washington	9547	0.4%																0.2%						1.1%
Washington	9548		0.4%							2.7%														3.1%
Washington	9549		0.3%			0.3%																		1.1%
Washington	9550												0.2%											0.2%
Washington	9551		0.4%			0.7%																		1.1%
Washington	9552		0.4%							1.0%								0.3%						1.7%
Washington	9553		0.8%																					0.8%
Washington	9554		0.7%																					0.7%
Washington	9555		0.2%							0.1%					0.1%									0.3%
Washington	9556	0.3%																						0.3%
Washington	9557		0.2%					0.2%																0.4%
Washington	9558											0.3%												0.3%
Windham	9670																							0
Windham	9671																							0
Windham	9672		0.1%		0.1%																			0.2%
Windham	9673		1.0%	0.3%							1.7%													3.4%
Windham	9674					0.9%																1.7%		2.6%
Windham	9675																							0
Windham	9676			0.4%																				0.4%
Windham	9677	0.0%																0.2%						0.2%
Windham	9678			0.1%																				0.1%
Windham	9679																			0.3%				0.3%
Windham	9680	0.6%																						0.6%
Windham	9681																							0
Windham	9682	0.3%																						0.3%
Windham	9683																							0
Windham	9684	0.3%										0.8%					0.9%							1.9%
Windham	9685	0.6%															0.7%				0.4%	0.2%		1.9%
Windham	9686	0.4%	0.2%									1.0%						0.6%				0.6%		2.8%
Windham	9687					0.4%					0.1%													0.5%
Windsor	9650		0.3%			0.5%							0.1%											0.9%
Windsor	9651																							0
Windsor	9652																							0
Windsor	9653		0.7%								0.7%													1.4%
Windsor	9654		0.1%																					0.3%
Windsor	9655.01												0.6%					0.2%						0.8%
Windsor	9655.02							0.3%				1.3%	0.5%											2.1%
Windsor	9656																							0
Windsor	9657		0.8%			0.3%																		1.2%
Windsor	9658		0.2%																					0.2%
Windsor	9659	0.3%																						0.3%
Windsor	9660					0.4%						0.5%					0.1%							0.9%
Windsor	9661	0.2%																						0.2%
Windsor	9662		0.4%																					0.4%
Windsor	9663		0.5%									0.4%												0.9%
Windsor	9665	1.2%						0.2%							0.7%									2.1%
Windsor	9666																							0
Windsor	9667	0.9%	0.2%	0.0%			0.7%													0.1%				2.0%

Source: 2011-2015 American Community Survey

*Only languages with 50 or more speakers are shown in the table

It can be seen that within any tract, no language group surpasses 400 individuals, however, there are three tracts in Chittenden County where linguistic isolates in one language surpass 5% of the population. These cases involve refugees from Bhutan and Burma in Tract 3, additional Bhutanese refugees in Tract 4, Arabic speakers from Iraq in Tract 24. As described below, Green Mountain Transit has engaged in direct outreach to these populations, assisted by the US Committee on Refugees and Immigrants– Vermont (formerly Vermont Refugee Resettlement Program). The Title VI Program of the Chittenden County Regional Planning Commission, the metropolitan planning organization for the urbanized area, also covers these concentrations of linguistically isolated individuals.

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 tracts and reflect primarily migrant farm workers who make relatively little use of public transportation. On the occasions when VTrans holds public meetings on statewide projects, it offers translation services upon request (see pages 37-40 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 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. Note that the PTAC meeting that would have been held in March 2020 was cancelled due to the COVID-19 pandemic.

Public Meeting	Date	Location	Agency
Public Transit Advisory Council, open to the public	6/15/17	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	9/21/17	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	12/14/17	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	3/15/18	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	6/21/18	VTrans headquarters, Montpelier	All Vermont
Public Transit Advisory Council, open to the public	9/20/18	VTrans headquarters, Barre	All Vermont
Public Transit Policy Plan Regional Forum	10/24/18	NW Counseling Services, St. Albans	Northwest RPC
Public Transit Policy Plan Regional Forum	10/30/18	Addison County RPC, Middlebury	Addison County RPC

Public Meeting	Date	Location	Agency
Public Transit Policy Plan Regional Forum	10/30/18	Town Offices, Randolph	Two Rivers-Ottawaquechee RPC
Public Transit Policy Plan Regional Forum	11/1/18	Town Welcome Center, Windsor	Southern Windsor RPC
Public Transit Policy Plan Regional Forum	11/1/18	The Current Offices, Rockingham	Windham RPC
Public Transit Policy Plan Regional Forum	11/14/18	Town Office, Hyde Park	Lamoille County RPC
Public Transit Policy Plan Regional Forum	11/14/18	Catamount Arts, St. Johnsbury	Northeastern VT Development Assn.
Public Transit Policy Plan Regional Forum	11/28/18	Chittenden County RPC, Winooski	Chittenden County RPC
Public Transit Policy Plan Regional Forum	11/28/18	Town Office, Waterbury	Central Vermont RPC
Public Transit Advisory Council, open to the public	12/13/18	VTrans headquarters, Barre	All Vermont
Public Transit Policy Plan Regional Forum	12/14/18	Rutland RPC Office, Rutland	Rutland RPC
Public Transit Policy Plan Regional Forum	12/18/18	VT Dept of Health, Bennington	Bennington RPC
Public Transit Advisory Council, open to the public	3/21/19	VTrans headquarters, Barre	All Vermont
Public Transit Advisory Council, open to the public	6/20/19	VTrans headquarters, Barre	All Vermont
Public Transit Advisory Council, open to the public	9/19/19	VTrans headquarters, Barre	All Vermont
Public Transit Advisory Council, open to the public	12/12/19	VTrans headquarters, Barre	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 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 seven 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 US Committee on Refugees and Immigrants. The table on the next page shows the number of refugee arrivals in Vermont by origin country over the past 25 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 38. 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. Each provider was assigned a department code number and given instructions on how to use the service. See pages 39-41 for details about Telelanguage services.

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 as needed.

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 USCRI – Vermont, 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. Subrecipients 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.

SUMMARY OF VERMONT REFUGEE RESETTLEMENTS 1995 - 2019

Nationality	FY-95	FY-96	FY-97	FY-98	FY-99	FY-00	FY-01	FY-02	FY-03	FY-04	FY-05	FY-06	FY-07	FY-08	FY-09	FY-10	FY-11	FY-12	FY-13	FY-14	FY-15	FY-16	FY-17	FY-18	FY-19	TOTAL
Burundi			1							12	11		43	29	9						6	6			8	125
Cameroon										1																1
Central African Rep.										6	1															7
Congo - Brazzaville						35	3	17	13	45	16	5	10													144
Dem. Rep. of Congo													9	3	2	16	11		1	15	32	73	48	75	89	374
Eritrea																		1	1							2
Ethiopia													3										2			5
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	59			1	840
Sudan				5			39	1	8	26	18	24	6	10	2		1		3	10			1			154
Togo							9		2	1	13				1											26
Uganda												4														4
AF Total	0	0	1	5	2	35	51	25	43	235	196	136	130	58	100	43	12	0	31	73	93	160	110	75	98	1,712
China								1	1		4															6
AS Total	0	1	1	0	4	0	6																			
Bosnia	124	161	238	318	272	198	162	83	26	9	4															1,595
Kosovo					58																					58
Moldova								1	2	1			1													5
EE Total	124	161	238	318	330	198	162	84	28	10	4	0	1	0	1,658											
Azerbaijan									18	15		1														34
FSU	5	12	8																							25
Georgia												6														6
Kazakhstan												1														1
Russia										26	42	26	5													99
Uzbekistan										2	53															55
FSU Total	5	12	8	0	0	0	0	0	18	15	28	103	26	5	0	220										
Afghanistan				8			11	10												1					1	32
Iran				8																			3			11
Iraq	28													60	28	17	4	10	19	56	20	1	19			262
Syria																								14		14
Turkey														6												6
NE/SA Total	28	0	0	16	0	0	11	10	0	0	0	0	0	66	29	17	4	10	19	57	20	4	33	0	1	325
Bhutan														129	158	189	311	298	256	173	192	218	88	54	1	2,067
Sri Lanka												1			7											8
Burma														71	40	55	34	42	17	24	7	4	5	3	15	317
Vietnam	79	80	32	39	55	42	17	5			5															354
SEA Total	79	80	32	39	55	42	17	5	0	0	5	1	0	200	205	244	345	340	273	197	199	222	93	57	16	2,746
Grand Total	236	253	279	378	387	275	241	125	90	260	238	240	157	329	334	304	361	350	323	327	312	386	236	132	115	6,668

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

F. 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 a 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 are also 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 2020, 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>In-Person Interpretation</p>	<p>Association of Africans Living in Vermont (AALV) 20 Allen Street, 3rd Floor Burlington, VT 05401 (802) 985-3106 Online: Complete the request form at https://www.aalv-vt.org/. (Your request will be confirmed by email.)</p> <p>Email: send your request to aalvinterpret@gmail.com</p> <p>After hours urgent requests: Call (802) 324-9794</p>	<ul style="list-style-type: none"> • Base rate is \$50 an hour. • 15-minute minimum charge, then charge is for 15-min increments. • No surcharge for afterhours, weekends, or holidays. • No charge for first 50 miles, state mileage rates used thereafter. • No charge for cancellations with at least 12 hours' notice; one-hour charge for less than 12 hours' notice. • Telephone call to client to confirm appt is available for \$5 per appointment. <ul style="list-style-type: none"> • Department requests interpreter • At least 5 working days' notice required for guaranteed service; AALV will try to satisfy requests with less notice. • AALV bills the Department directly. • Department pays AALV.
<p>Telephonic Interpretation & Written Translation Services <u>BGS Contract #31184</u></p>	<p>Telelanguage Inc. 514 SW 6th Avenue 4th Floor Portland, OR 92204 http://telelanguage.com</p> <p>Toll Free: 1.888.983.5352 E-mail: info@telelanguage.com</p>	<ul style="list-style-type: none"> • Free, one-time setup for initial account, implementation, and training. No monthly service fee. • Telephonic Interpretation: • Rate is \$0.72 per minute for telephonic interpretation. • Flat rate across 170 languages, on demand 24/7/365. • Video Interpretation: • Rate is \$3.75 per minute. • Translation Services: • Written translation rate is 0.28 per word. • Written translation technical rate is 0.30 per word. • Written translation rush service within 24 hours is 20% more than base rate. <p>Contractor invoices include itemization of work performed with name of requester, organization unit, language, time, date, type of service, number of words, and document name.</p> <ul style="list-style-type: none"> • 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. tbernal@telelanguage.com Toll Free: 1.888.983.5352 Main: 503.535.2178 • Ask your business manager for account number, access code, etc. • Telelanguage invoices the Department or Division and Department/Division pays Telelanguage.



IF YOU NEED AN INTERPRETER

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

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

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Vermont Agency of Transportation



Acholi
Afrikaans
Akan
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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

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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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 Green Mountain Transit 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 seven 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

Title VI program requirements vary for states and subrecipients, and urban areas above and below the threshold of 200,000 residents.

"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 VTrans program application and is part of the signed agreement between VTrans and the sub-recipient.

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 during the management review or when compliance changes such as when a complaint is received.

VTrans is required to among other things, provide the FTA with Title VI assurances in the annual Certs and Assurance; to provide a Title VI program every 3 years; to develop Title VI complaint procedures; to record any complaints, investigations and lawsuits; to notify recipients of their rights; and to develop meaningful access to those with limited English proficiency. In order to meet these requirements, further guidance is provided in 4702.1B. VTrans conducted a statewide assessment of minority and low-income populations and language usage in Vermont and will continue to do so with each census.

VTrans conducted the statewide assessment and mapping of minority, low-income and language usage in Vermont in 2017 and used it to develop their Limited English Proficiency plan (LEP). LEP is a part of the Title VI program. VTrans submitted their LEP plan to the FTA and to the sub-recipients so they could adapt their programs as necessary including any special outreach to those who were less than proficient in English. VTrans also made their state contract with Language Line available at no charge to all the transit providers in 2012. This provides phone (oral) and written translation services to all subrecipients.

Each transportation provider must sign an assurance that they will follow the provisions mentioned above. The provisions also apply to employment and business opportunities including subcontracting. These requirements are considered an addition to and not in lieu of the provisions of Title VI. This assurance is found in the VTrans application packet, and as part of the signed agreement between VTrans and the transportation provider."

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.

Subrecipient	Date of management review	Most recent Title VI Program Submission	Location of services and facilities, non-discriminatory?	Civil Rights Discrimination complaints since last review?	Next scheduled review
AT	11/2017	4/2020	Y	No	Spring 2020
GMCN	8/2019	4/2020	Y	No	7/2022
GMT	6/2018	5/2020	Y	No	2/2021
MVRTD	7/2019	4/2020	Y	No	7/2022
RCT	10/2018	4/2020	Y	No	11/2021
SEVT	8/2017	9/2017	Y	No	11/2020
TVT	7/2019	7/2017	Y	No	7/2022
VABVI		4/2020	N/A		
VPTA		4/2020	N/A		

In addition to the regular periodic reviews, VTrans staff members 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 Title VI-related results of selected management reviews undertaken over the past three years.

SEVT/The MOOVER – August 2017

TITLE VI--NONDISCRIMINATION IN THE DELIVERY OF SERVICE

1. What is the racial composition of your service area?	Only 5.5% of residents are either Hispanic or some race other than White. People in poverty are more prevalent, with 11.8% of residents having incomes below the federal poverty level.	
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, based on population concentrations, demand and funding levels. Same as above.	
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?	Fixed route transit services are provided along major corridors. E&D service is provided throughout the entire SEVT service area. Yes	
4. Please review the Title VI general reporting information submitted with the last application. List all complaints alleging discrimination in the delivery of service that were reported. Follow up on the status of the complaints. Do the complaints indicate that the grantee may discriminate in the delivery of service?		
Complaint Description		Date Filed
None		Status
5. Who investigates complaints?	General Manager	
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?	Public meetings properly noticed. Working with Regional Planning Commissions who maintain contact with organizations that represent the interests of low income and minority groups. Meeting times and locations designed to maximize accessibility. Interpreters are provided if requested.	
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?	Same as all other groups
10. Is the company Title VI policy clearly posted in the transit facility in locations with easy access to staff and the general public?	Yes
11. Is the policy posted on all transit vehicles?	Yes
<p>12. Does your agency use the Four Factor Analysis to determine the specific language services that are appropriate for your service areas? If yes:</p> <p>(1) Does the analysis identify the number or proportion of LEP persons eligible to be served or likely to be encountered by the program?</p> <p>a) How does the LEP persons interact with the agency?</p> <p>b) Does analysis identify the LEP communities and assess the number or proportion of LEP persons from each language group for the appropriate language services for each language group?</p> <p>c) Does it identify the literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice?</p> <p>d) Does it determine whether LEP persons are underserved by the recipient due to language barriers?</p>	<p>Yes</p> <p>Yes</p> <p>Inquiries regarding basic info; purchasing fare media; making reservations for demand-response services; handling passenger complaints; gathering data such as on-board customer surveys.</p> <p>Yes</p> <p>No</p> <p>No, LEP population in SEVT service area is very low at .89.</p>

Rural Community Transportation, Inc. – December 2018

TITLE VI--NONDISCRIMINATION IN THE DELIVERY OF SERVICE

1. What is the racial composition of your service area?	the RCT service area is overwhelmingly white and native born, with only 4.5% of the population being either Hispanic or non-white, and only 3.2% of the population not born in the United States.
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?	RCT provides service to a few areas with minority populations and they receive the same quality of service as all of RCT service area.
3. Please describe the location of transit services and facilities. Have you ensured that decisions on the location of transit services and facilities are made without regard to race, color, creed, national origin, sex, age, or disability?	Main location, just off the bus route, Newport office , on the bus route, Morrisville office on GMT bus route. Decisions were made without regard to race, color, creed, national origin, sex, age or disability.
4. Please review the Title VI general reporting information submitted with the last application. List all complaints alleging discrimination in the delivery of service that were reported. Follow up on the status of the complaints. Do the complaints indicate that the grantee may discriminate in the delivery of service?	
Complaint Description	
Date Filed	
Status	
No Complaints filed.	
5. Who investigates complaints?	NA
6. Have any complaints concerning discrimination in the delivery of service been received? If yes:	No
a) How were the complaints identified and resolved?	NA
b) Were complaints reported to VTrans? How long after receipt of the complaint?	NA
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?	Yes

<p>8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.</p>	<p>Yes, We have had one individual that states they are American Indian feel there was not adequate transportation services for his needs. He does not want to participate in any program, does not want to give requested information, but wants free transportation to anything he requests.</p>
<p>9. How do you promote your service to minority populations?</p>	<p>Individually as requested</p>
<p>10. Is the company Title VI policy clearly posted in the transit facility in locations with easy access to staff and the general public?</p>	<p>Yes</p>
<p>11. Is the policy posted on all transit vehicles?</p>	<p>Yes</p>
<p>12. Does your agency use the Four Factor Analysis to determine the specific language services that are appropriate for your service areas? If yes:</p> <p>(1) Does the analysis identify the number or proportion of LEP persons eligible to be served or likely to be encountered by the program?</p> <p>a) How does the LEP persons interact with the agency?</p> <p>b) Does analysis identify the LEP communities and assess the number or proportion of LEP persons from each language group for the appropriate language services for each language group?</p> <p>c) Does it identify the literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice?</p> <p>d) Does it determine whether LEP persons are underserved by the recipient due to language barriers?</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>

Marble Valley Regional Transit District – July 2019

TITLE VI-NONDISCRIMINATION IN THE DELIVERY OF SERVICE

1. What is the racial composition of your service area?	In Rutland 95.81% of the population is White. In Rutland 0.89% of the population is Black or African American. In Rutland 1.66% of the population is Asian	
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 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?	Administrative office – Rutland City Transit Center – Rutland City Yes	
4. Please review the Title VI general reporting information submitted with the last application. List all complaints alleging discrimination in the delivery of service that were reported. Follow up on the status of the complaints. Do the complaints indicate that the grantee may discriminate in the delivery of service?		
Complaint Description		Date Filed
Status		
No complaints alleging discrimination have been received in the past decade.		
5. Who investigates complaints?	If they come in, the HR Manager and ED Supervisors receive complaints, forward to management.	
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?	MVRTD's public process is non-discriminatory. It is advertised openly and all are welcome to participate.	

<p>8. Have representatives of these groups expressed a need for transportation improvements? If yes, please describe.</p>	<p>We have received no expressed need from a minority population.</p>
<p>9. How do you promote your service to minority populations?</p>	<p>To date, we have conducted no special outreach, however, plan to incorporate procedures to identify and target minority populations.</p>
<p>10. Is the company Title VI policy clearly posted in the transit facility in locations with easy access to staff and the general public?</p>	<p>Yes. See accompanying photos.</p>
<p>11. Is the policy posted on all transit vehicles?</p>	<p>Yes. See accompanying photos.</p>
<p>12. Does your agency use the Four Factor Analysis to determine the specific language services that are appropriate for your service areas? If yes:</p> <p>(1) Does the analysis identify the number or proportion of LEP persons eligible to be served or likely to be encountered by the program?</p> <p>a) How does the LEP persons interact with the agency?</p> <p>b) Does analysis identify the LEP communities and assess the number or proportion of LEP persons from each language group for the appropriate language services for each language group?</p> <p>c) Does it identify the literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice?</p> <p>d) Does it determine whether LEP persons are underserved by the recipient due to language barriers?</p>	<p>We have LEP posters on buses and located at the transit center.</p> <p>We have not used the Four-Factor Analysis in the past. We have such a small percentage of minorities in our service area that we post for any potential populations with our LEP posters. We post on all our buses and in our transit center as well as in our offices.</p> <p>We have never had interactions with LEP people.</p> <p>We are currently working with VTrans' Civil Rights Section to complete a Four-Factor Analysis.</p>

Advance Transit – January 2020

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 College 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?</p>			
<p style="text-align: center;">Complaint Description</p>		<p style="text-align: center;">Date Filed</p>	<p style="text-align: center;">Status</p>
<p>None Received</p>			
<p>5. Who investigates complaints?</p>	<p>Executive Director</p>		
<p>6. Have any complaints concerning discrimination in the delivery of service been received? If yes:</p>	<p>No</p>		
<p>a) How were the complaints identified and resolved?</p>	<p>N/A</p>		
<p>b) Were complaints reported to VTrans? How long after receipt of the complaint?</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>During TDP process many public meetings and stakeholder meetings were held. 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 not likely to happen in the next four years under current funding constraints. All documented in TDP.</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>
<p>10. Is the company Title VI policy clearly posted in the transit facility in locations with easy access to staff and the general public?</p>	<p>Yes</p>
<p>11. Is the policy posted on all transit vehicles?</p>	<p>Yes</p>
<p>12. Does your agency use the Four Factor Analysis to determine the specific language services that are appropriate for your service areas? If yes:</p> <p>(1) Does the analysis identify the number or proportion of LEP persons eligible to be served or likely to be encountered by the program?</p> <p>a) How does the LEP persons interact with the agency?</p> <p>b) Does analysis identify the LEP communities and assess the number or proportion of LEP persons from each language group for the appropriate language services for each language group?</p> <p>c) Does it identify the literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice?</p> <p>d) Does it determine whether LEP persons are underserved by the recipient due to language barriers?</p>	<p>Yes. See pages 22-28 of the Title VI document on file.</p> <p>0. Yes. Advance Transit evaluated the level of English literacy and to what degree people in its service are speak a language other than English and what those languages are. Data for this review is derived from the US Census and the American Community Survey.</p> <p>Method of Interactions:</p> <p>Telephone 16.6%</p> <p>Face to face 73.3%</p> <p>E-mail .01%</p> <p>Fax 0%</p> <p>b) Yes, see map on page 23 of Title VI plan.</p> <p>c) Yes</p> <p>d) No</p>

IX. 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 2014-2018 American Community Survey. The first map shows the absolute number of minorities by Census tract, and the second map shows those tracts where the percentage of minority residents exceeds the statewide average.

The tracts with the greatest number of minorities are located in the Intervale and New North End of Burlington, plus the western part of Winooski. The next tier of tracts, with between 500 and 1,000 minority individuals include much of the rest of the core of Chittenden County as well as parts of Middlebury and St. Albans and a swath of towns in Franklin County along the Canadian border. Most tracts in the northern half of the state have greater than 100 non-white individuals, though many of those tracts are large and encompass several towns.

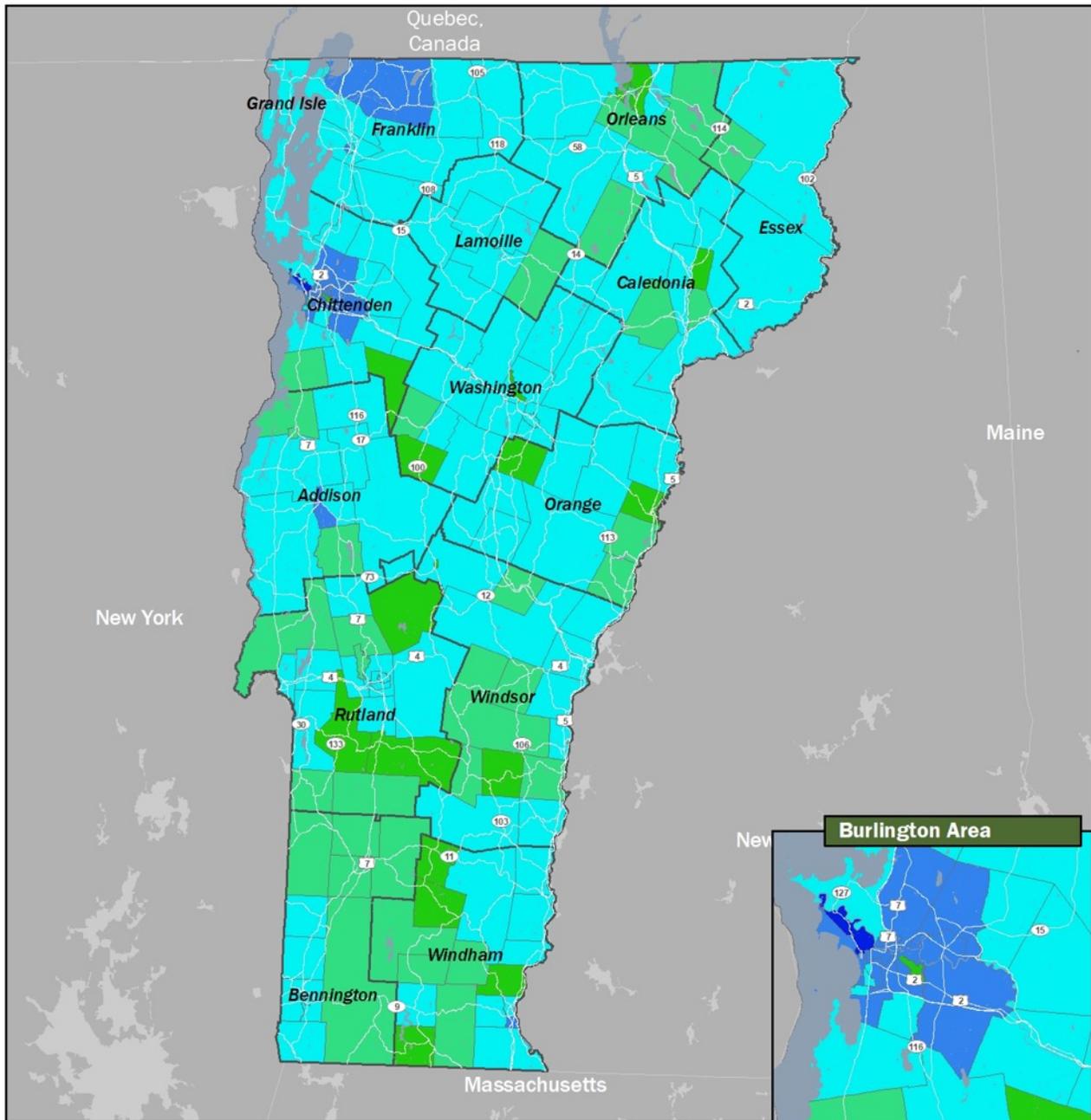
The concentrations of minority persons (percentages above the statewide average) can be found in the core of Chittenden County, large portions of Addison, Orange, Essex and Franklin counties, and isolated tracts spread over the rest of Vermont.

Non-Native Born National Origin

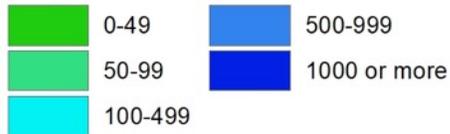
The two maps representing data on the national origin of Vermont residents are similar in many ways to the maps of minorities. The core of Chittenden County again has the highest totals and the whole northwestern sector has higher numbers than most of the rest of the state. The entire northern tier along the Canadian border shows up with moderate numbers of foreign-born individuals, reflecting a higher representation of French Canadians.

The map of concentrations of foreign-born residents shows much of the northern tier with percentages higher than the state average, though most of these areas are sparsely populated. All of the tracts in the core of Chittenden County (other than the airport) have concentrations of non-natives, due mainly to the refugee resettlement program (see section on LEP for more discussion) and much of Addison County has concentrations of non-natives. All counties except Orange have at least one tract with a concentration of foreign-born individuals.

Race and Ethnicity

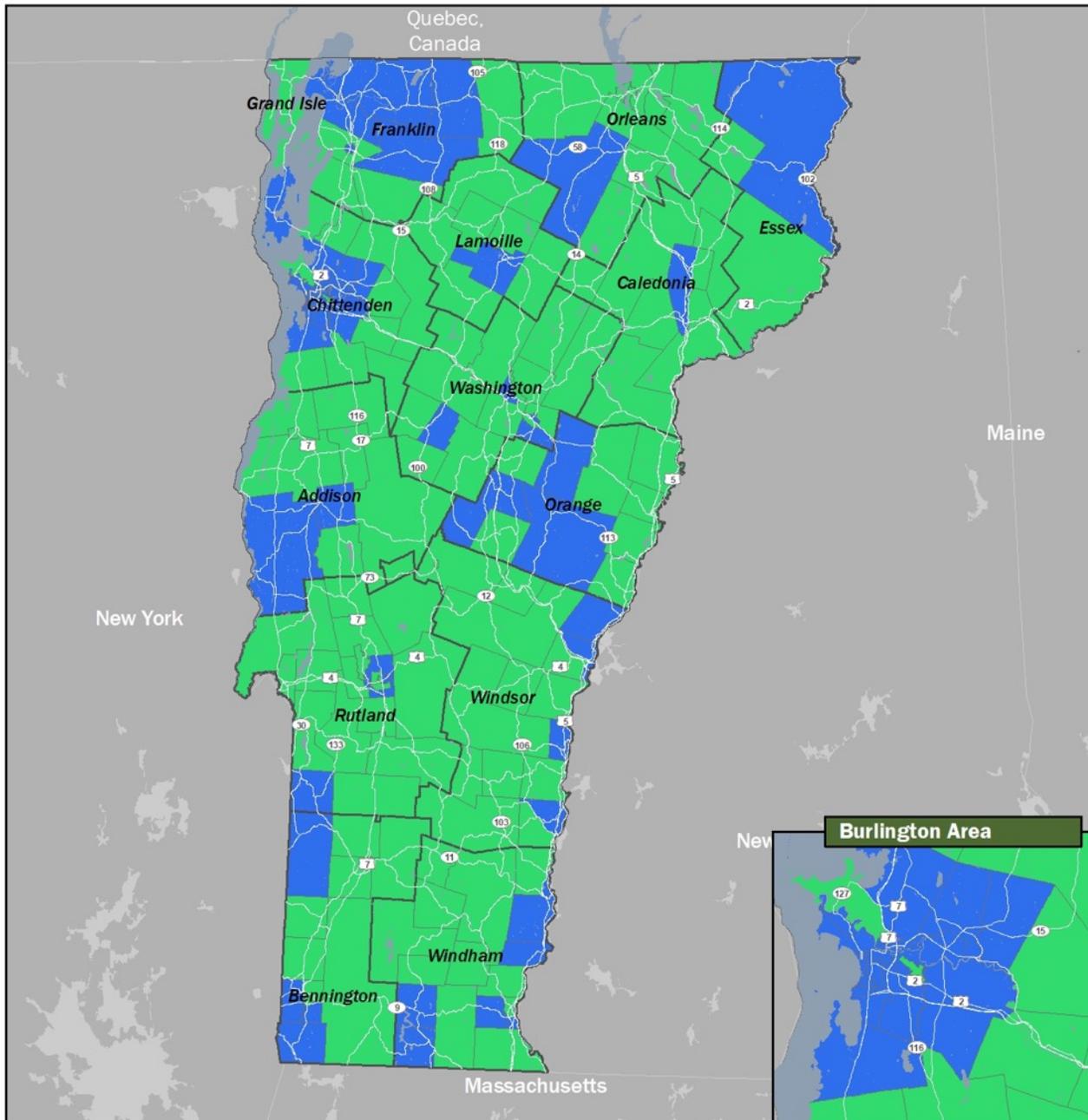


Number of Non-White Persons, by Census Tract

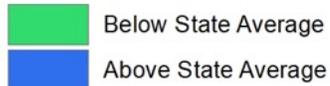


Source: 2014-2018 ACS

Race and Ethnicity

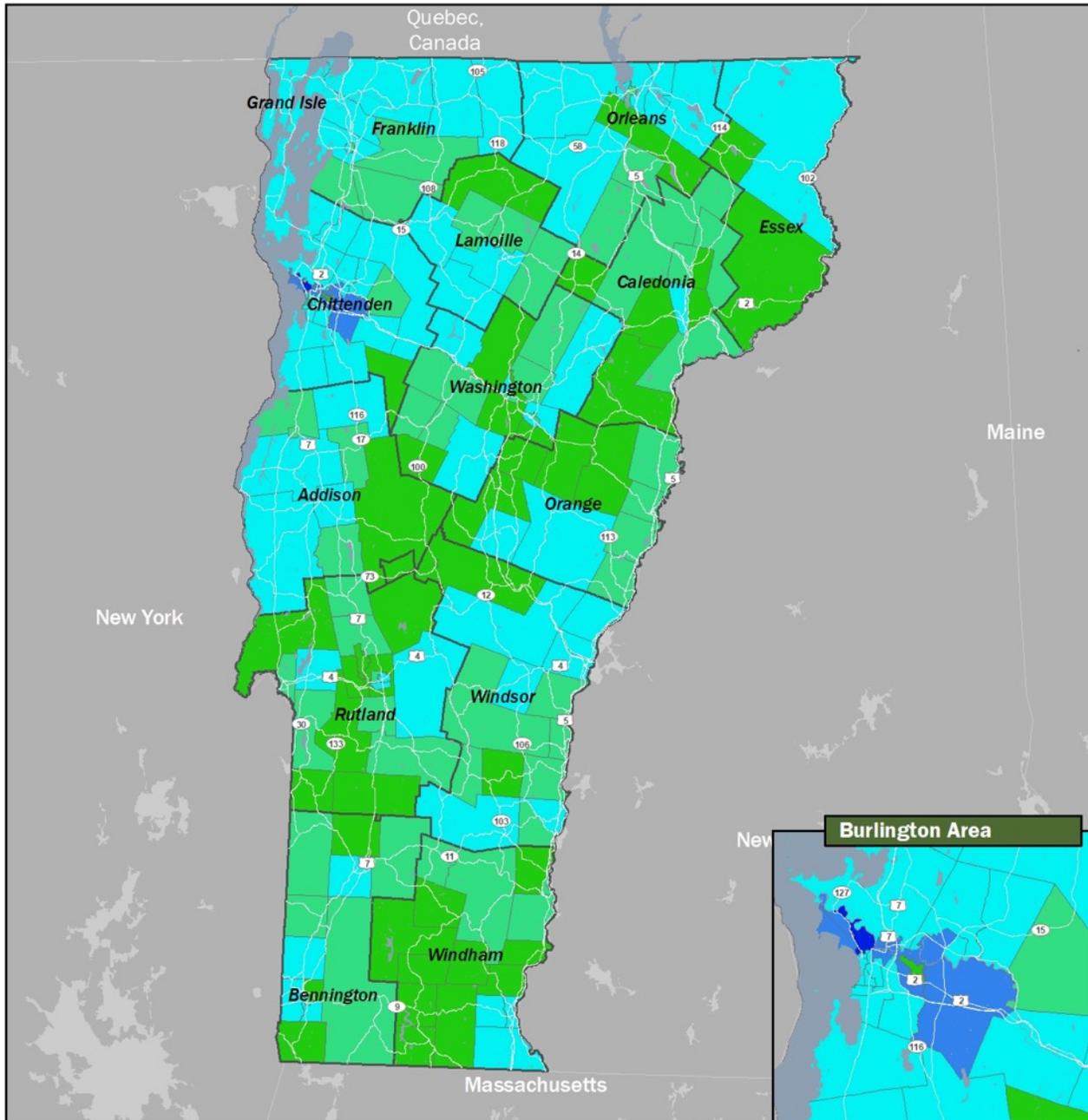


Percent of Population that is Non-White and/or Hispanic or Latino, by Census Tract



Source: 2014-2018 ACS

Foreign-Born Populations

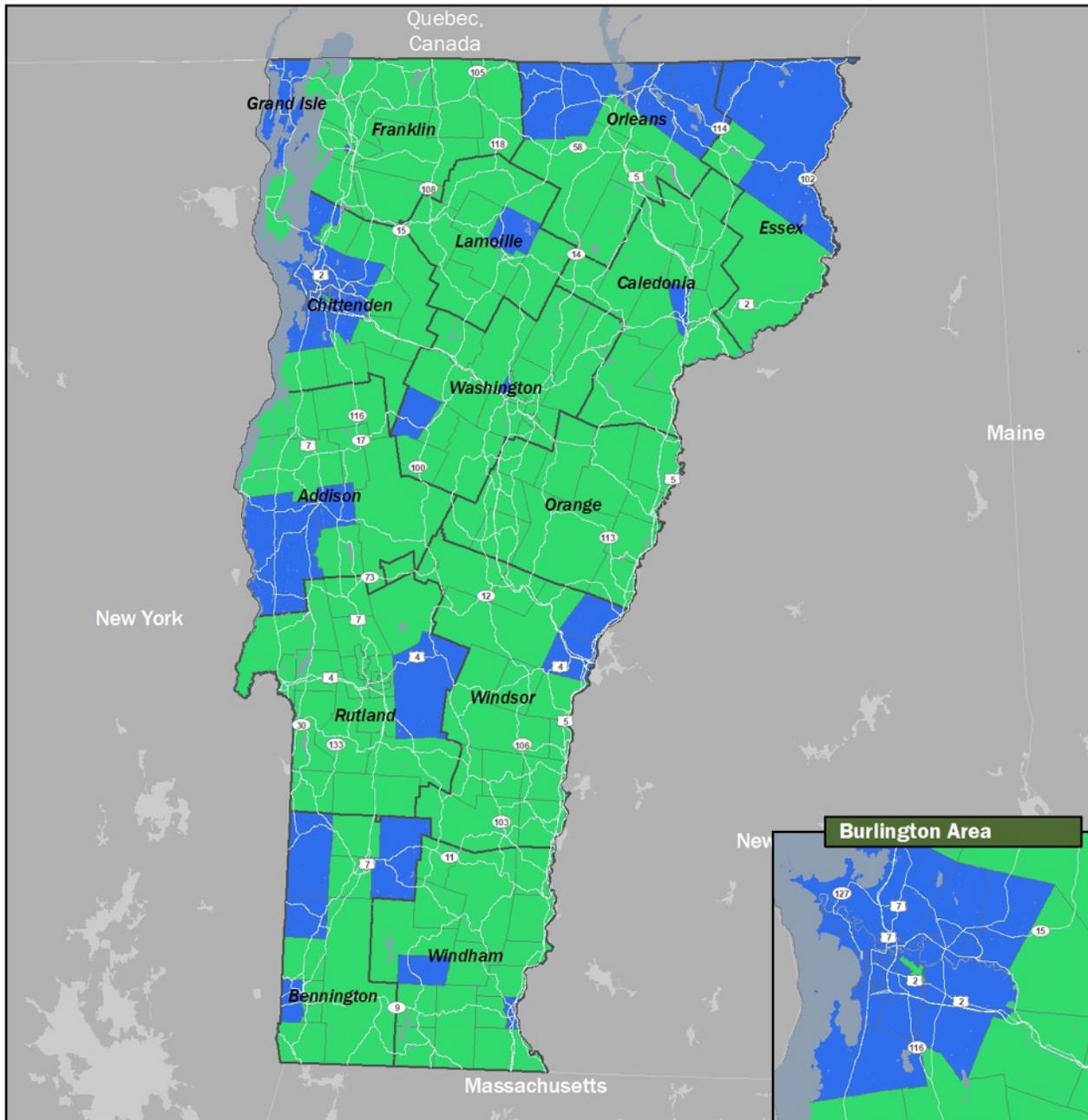


Number of Residents Born Outside the United States, by Census Tract

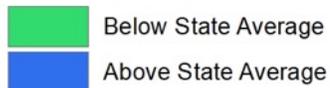


Source: 2014-2018 ACS

Foreign-Born Populations



Percentage of Residents Born Outside the United States, by Census Tract



Source: 2014-2018 ACS

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 2018 American Community Survey data, about 10.7% 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, 7.0% of residents are minorities, and 4.6% of residents were not born in the United States.

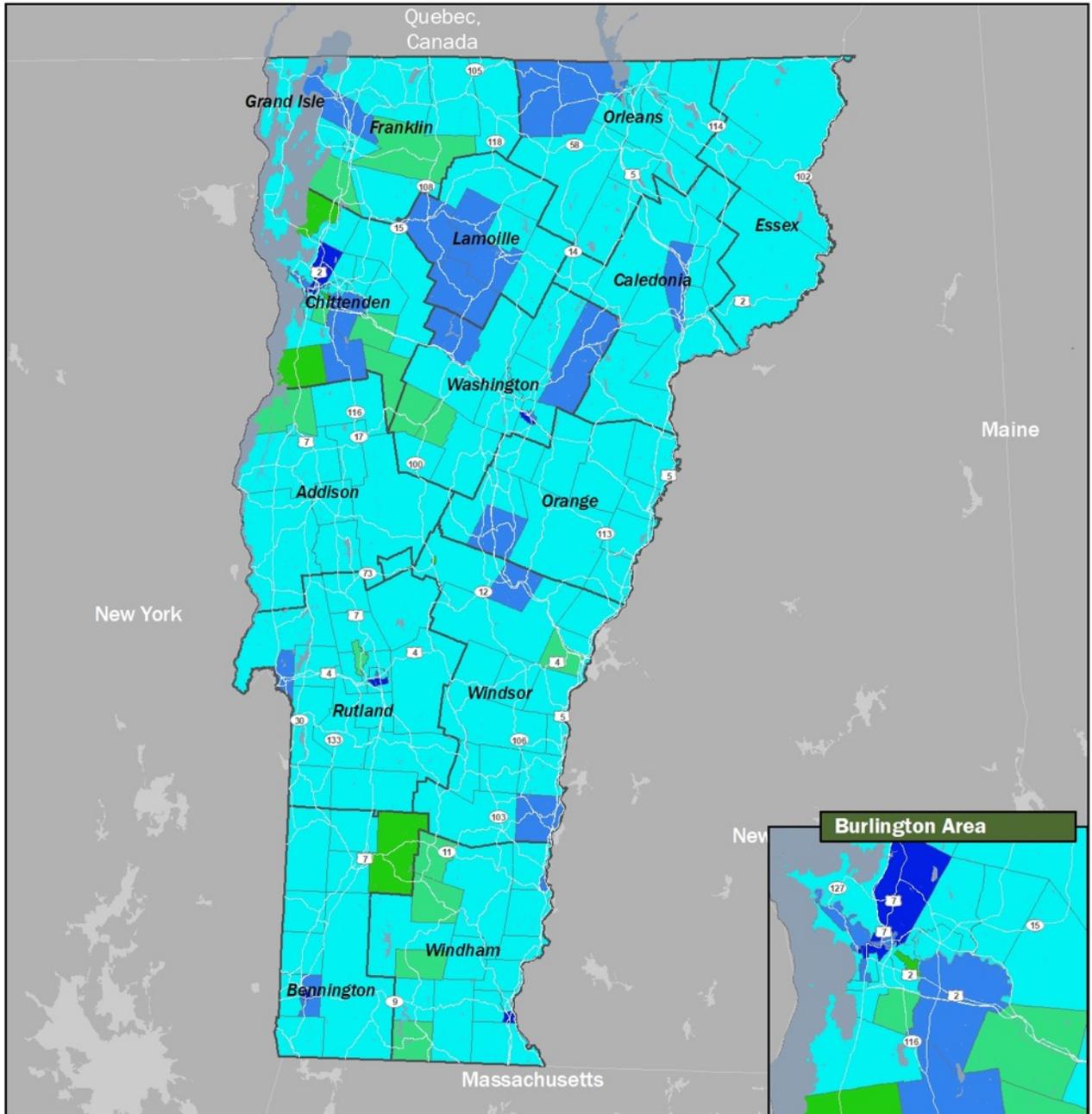
The analogous maps of low-income individuals show many of the same patterns as seen in the previous maps, though many more tracts fall into the higher categories. Tracts with over 1,000 people in poverty include three in the northern part of Burlington, the eastern part of Colchester, the western part of Winooski, the southern part of Rutland, the southern part of Barre City, and the southern part of Brattleboro. Every county but Addison and Essex have a tract with at least 500 people in poverty, and there are very few tracts that have fewer than 100 people in poverty.

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, the UVM Medical Center, Global Foundries, State agencies, and many financial institutions.

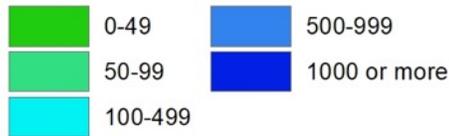
Proximity to the large employment center in the Hanover-Lebanon area has helped to keep poverty below average in southern Orange County and most of eastern Windsor County. Similarly, State jobs and insurance companies have helped to keep most of Washington County out of poverty status.

The Northeast Kingdom, however, and much of Orange County, Lamoille County, and the Connecticut River Valley south of the Town of Windsor, show concentrations of persons below the poverty line. Many of the larger towns and small cities also show concentrations, including Bennington, Brattleboro, Rutland, Montpelier, Barre, and St. Johnsbury.

Population in Poverty

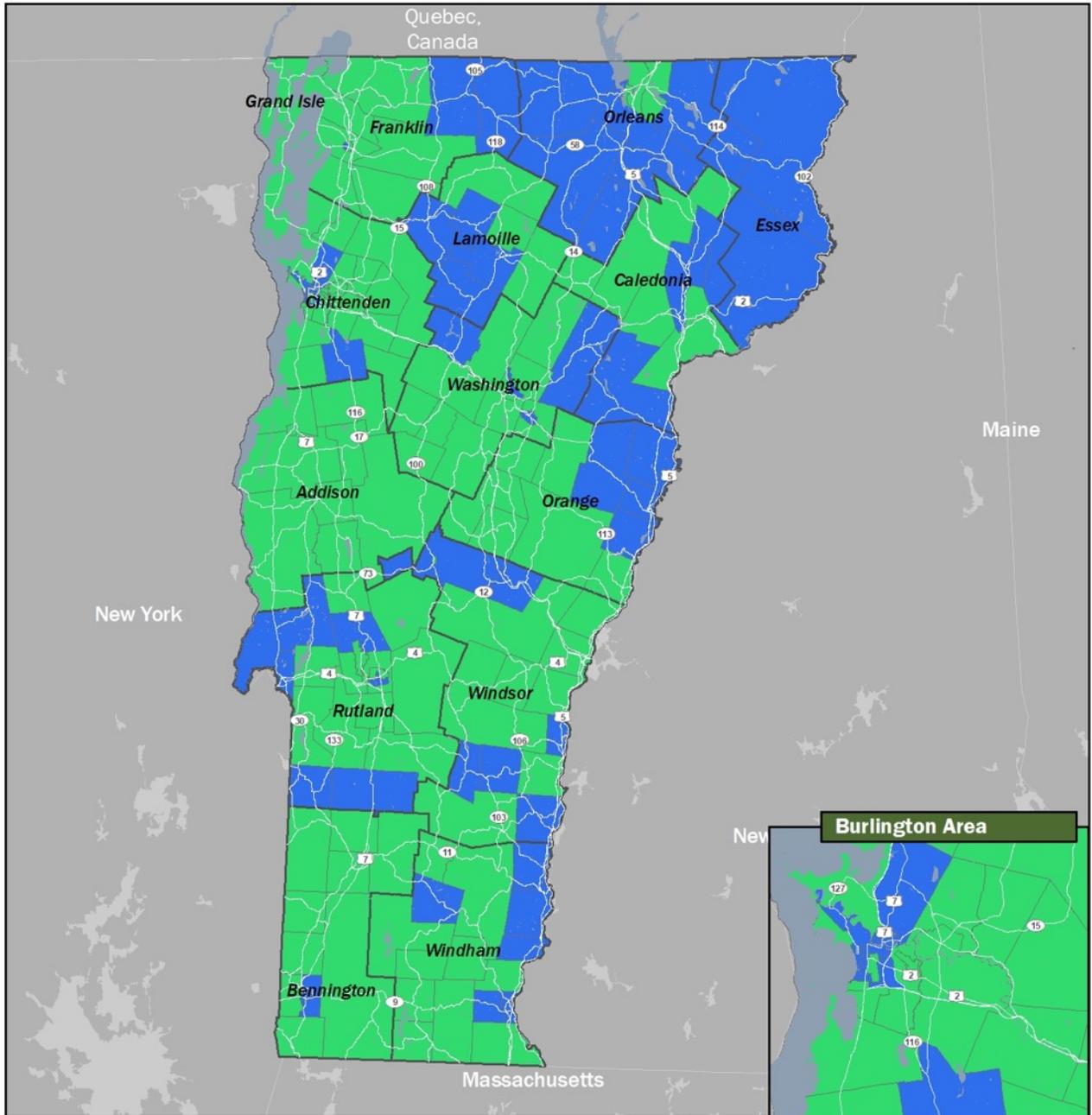


Number of Residents in Poverty, by Census Tract

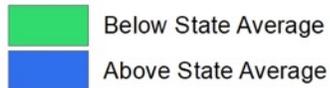


Source: 2014-2018 ACS

Population in Poverty



**Percent of Residents
in Poverty, By
Census Tract**



Source: 2014-2018 ACS

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 2014-2018 American Community Survey, 93% of the statewide population is "white only." Of the 183 Census tracts in the state, only 28 of them have minority percentages higher than 10%, and 20 of these are in the core of Chittenden County.

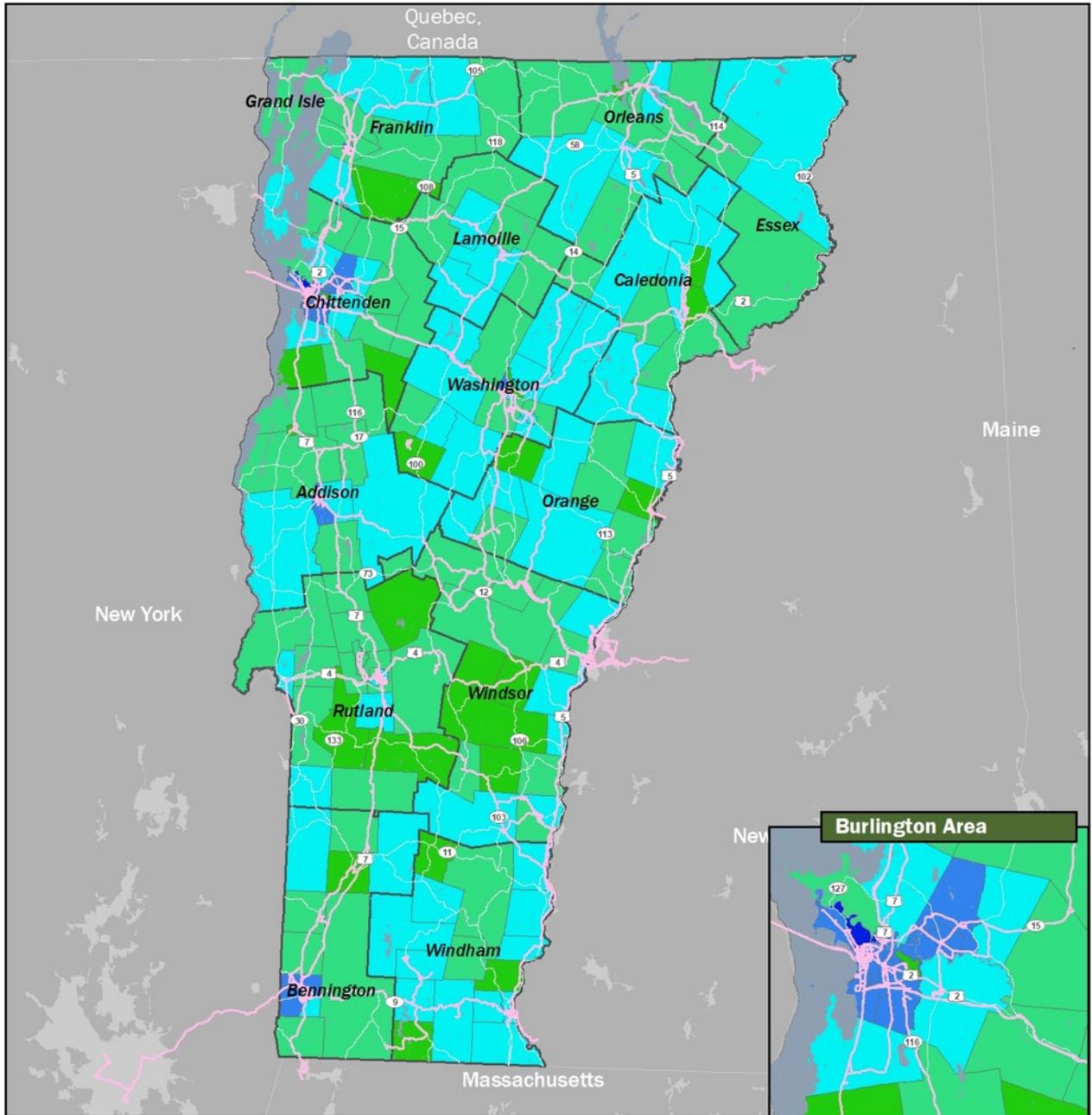
The table below compares the amount of funding for bus operations with the minority populations in their respective service areas.

Bus Route Service Area Racial Breakdown and Funding

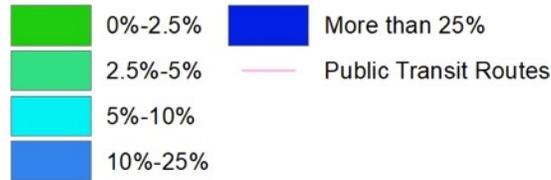
Agency	Bus Route Service Area Population	White Only	Non White	Percentage White	Percentage Non White	State and Federal Funding
AT	13,021	12,238	783	94.0%	6.0%	\$ 710,000
GMCN	32,948	31,179	1,769	94.6%	5.4%	\$ 716,595
GMT Rural	113,990	107,296	6,694	94.1%	5.9%	\$ 2,851,500
GMT Urban	153,844	136,769	17,075	88.9%	11.1%	\$ 8,319,546
MVRTD	56,132	53,575	2,557	95.4%	4.6%	\$ 2,871,200
RCT	55,468	53,007	2,461	95.6%	4.4%	\$ 506,408
SEVT	61,849	57,830	4,019	93.5%	6.5%	\$ 2,649,427
TVT	85,221	80,587	4,634	94.6%	5.4%	\$ 2,029,498
None	53,933	51,510	2,423	95.5%	4.5%	
TOTALS	626,406	583,991	42,415	93.2%	6.8%	\$ 20,654,174

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

Race and Ethnicity

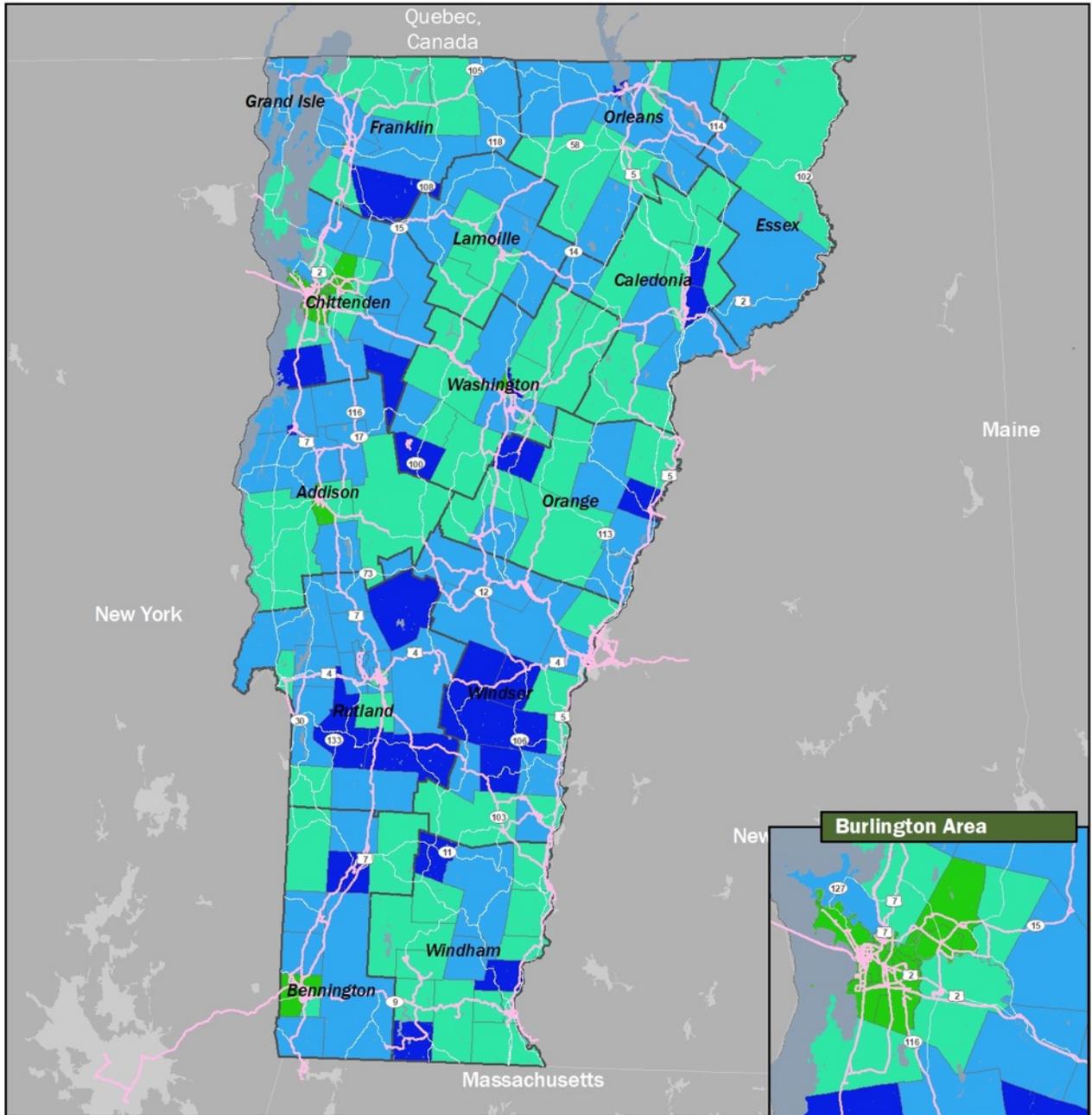


Percent of Population that is non-White and non-Hispanic or Latino, by Census Tract

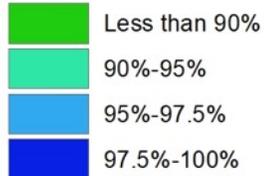


Source: 2014-2018 ACS

Race and Ethnicity



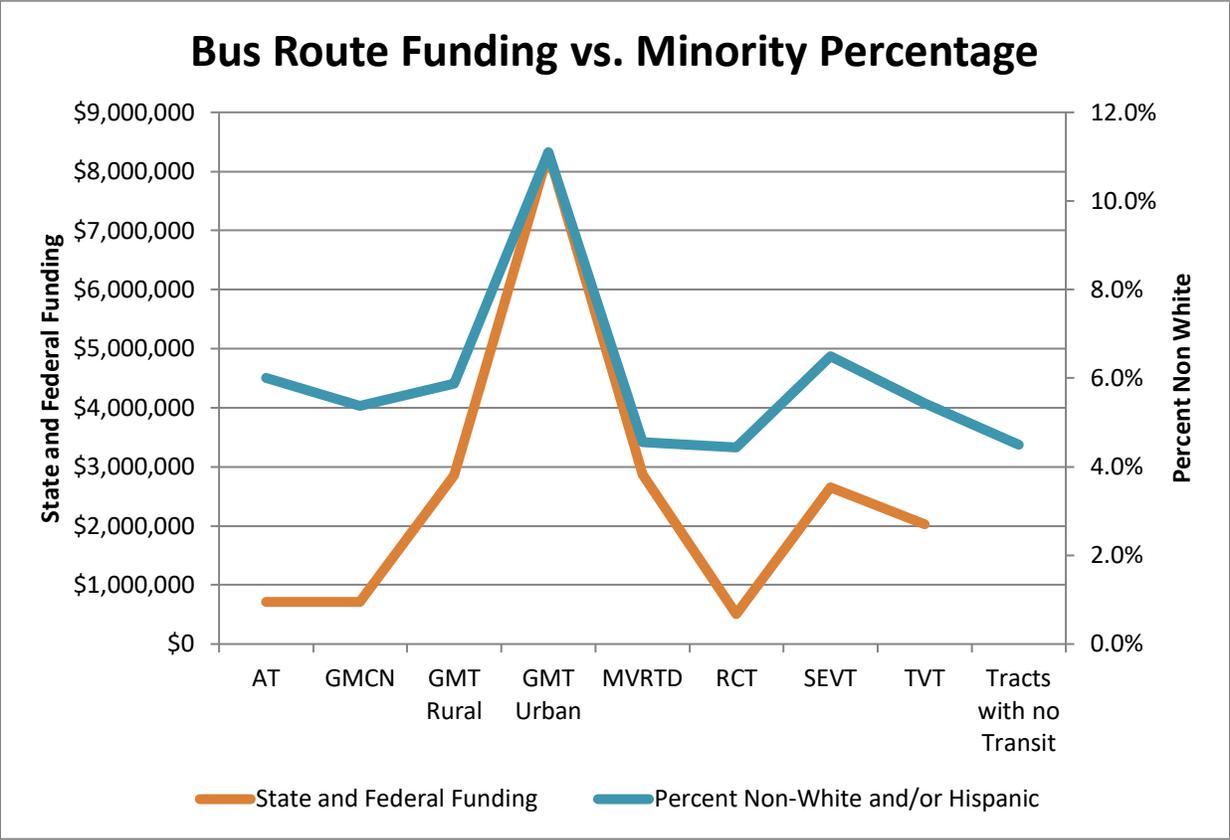
Percentage of Population that is White and not Hispanic or Latino, by Census Tract



Public Transit Routes



Source: 2014-2018 ACS



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 4.4% to 11.1%. Excluding GMT-Urban, the range is only 4.4% to 6.9%. 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 only exception to this is Advance Transit, which receives relatively little funding from Vermont, as most of its service area is in New Hampshire. 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 engage 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 (HSTCP)

In its most recent cycle, the PTPP was integrated with the HSTCP into a single document, following the reasoning that the majority of public transit in Vermont's rural areas (comprising more than 60% of the state's population) is human service transportation. The combined PTPP/HSTCP 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 are inclusive and participation from groups protected under Title VI and Environmental Justice is strongly encouraged (see section V for more discussion). Meeting locations, facilities, and times are set so that they are maximally accessible by members of protected groups.

With respect to the benefits and burdens of the FTA investments in Vermont, these investments are mapped against the locations by census tract or block group 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:

Project Selection Criteria

Funds, including all formula programs and flexed funds are distributed competitively. Criteria considered in the distribution are population category needs, the need for employment, the reduction of congestion, geographic balance, cost of service, the current administrative and legislative goals, and economic development potential.

Requirements include coordination, management capacity as determined by successful management reviews (new providers must be reviewed), availability of match, program compliance issues such as drug and alcohol testing, lack of ridership in previous routes, etc.

Upon formal application submittal, the Public Transit Section staff reviews, screens and informally ranks the formal applications on content and on "need". The available funding 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 and projects. This list also identifies which applicants are minorities or provide service to minorities. (To date VTrans has not had any applicants who are minorities)

The program of projects developed by VTrans reflects projects that will use any increased funding to support the expansion of transit services to areas not currently served, to improve the level of service in areas which have minimal service and to promote transportation linkages to other public transportation providers.

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 seven 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:

- **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:** VTrans has an ongoing contract with a translation service. Materials and instructions on how to access this new service are provided to the transit providers.
- **Training Provided by Members of the VTrans Office of Civil Rights:** In October of 2019, three members of the VTrans Office of Civil Rights provided three sessions of a 2.5-hour training on Title VI, Workplace Civility, and Unconscious Bias to Rural Community Transportation (RCT) employees, volunteer drivers, and board members. A total of 63 people participated in this training. It is anticipated that similar training will be delivered to Vermont's other Public Transits during the next reporting 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:

June 2017	Title VI Program for TVT
September 2017	EEO Program for TVT
January 2018	EEO Program for MVRTD
January 2020	EEO Program for AT
February 2020	Title VI Program for CIDER

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.