Piedmont Authority for Regional Transportation
Title VI Program Plan

Related to Transportation Planning and Transportation Improvements

Submitted to: Federal Transit Administration Region IV
Office of Civil Rights
230 Peachtree Street, Suite 800 Atlanta, GA 30303

September 14, 2016
RECIPIENT INFORMATION

RECIPIENT: Piedmont Authority for Regional Transportation (Regional Transportation)

SUBMITTAL DATE: September 23, 2016

PROGRAM UPDATE: September 14, 2016 for the incorporation of FTA policy and Governing Board adoption on a minimum three year period.

EXPIRATION YEAR: 2019

CONTACT INFORMATION: Scott W. Rhine, PART Executive Director

107 Arrow Road, Greensboro, NC 27409.
Phone: 336/662-0002
Fax: 336/662-9253
scottr@partnc.org

Supriya Raghav, Regulatory Affairs Specialist, Piedmont Authority for Regional Transportation

107 Arrow Road, Greensboro, NC 27409.
Phone: 336/662-0002
Fax: 336/662-9253
supriyar@partnc.org
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>I. PROVISION OF TITLE VI ASSURANCES</td>
<td>4</td>
</tr>
<tr>
<td>II. TITLE VI COMPLIANCE HISTORY</td>
<td>4</td>
</tr>
<tr>
<td>III. INCORPORATION OF THE PROGRAM</td>
<td>5</td>
</tr>
<tr>
<td>IV. GENERAL GUIDELINES/REQUIREMENTS</td>
<td>6</td>
</tr>
<tr>
<td>a. Annual Certification and Assurance</td>
<td>6</td>
</tr>
<tr>
<td>b. Complaint Procedures</td>
<td>6</td>
</tr>
<tr>
<td>c. Record Title VI Activities</td>
<td>6</td>
</tr>
<tr>
<td>d. Access for LEP Persons</td>
<td>6</td>
</tr>
<tr>
<td>e. Public Notification</td>
<td>6</td>
</tr>
<tr>
<td>f. Additional Information</td>
<td>7</td>
</tr>
<tr>
<td>g. Timely Submission</td>
<td>7</td>
</tr>
<tr>
<td>h. Environmental Analysis of Construction Projects</td>
<td>8</td>
</tr>
<tr>
<td>i. Public Participation</td>
<td>9</td>
</tr>
<tr>
<td>j. Public Hearing Process for Service and Fare Change</td>
<td>9</td>
</tr>
<tr>
<td>k. Monitoring and Evaluation</td>
<td>12</td>
</tr>
<tr>
<td>l. Service Standard</td>
<td>13</td>
</tr>
<tr>
<td>APPENDIX A – Title VI Complaint Procedures and Form</td>
<td>15</td>
</tr>
<tr>
<td>APPENDIX B – Limited English Proficiency (LEP) Plan</td>
<td>21</td>
</tr>
</tbody>
</table>
I. PROVISION OF TITLE VI ASSURANCES

The Piedmont Authority for Regional Transportation (PART) hereby certifies that, as a condition of receiving Federal financial assistance under the Urban Mass Transportation Act of 1964, as amended, it will ensure that:

a. PART shall submit on an annual basis, its Title VI Assurance, as part of its annual Certification and Assurance submission to the FTA.

b. No person, on the basis of race, color, or national origin, will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.

c. PART will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1B and in compliance with the Department of Transportation’s Title VI Regulation, 49 CFR, Part 21

d. PART will make it known to the public that those persons or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

II. TITLE VI COMPLIANCE HISTORY

a. There are no outstanding lawsuits or complaints naming PART which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits.

b. During the course of the last three (3) years, there have not been any civil rights compliance review activities conducted with respect to PART and, to the best of our knowledge, there are not presently any ongoing civil rights compliance review activities being conducted with respect to PART.

c. There are currently no pending construction projects which would negatively impact minority communities being performed by PART.

III. INCORPORATION OF THE PROGRAM

The Piedmont Authority for Regional Transportation (hereinafter referred to as “PART” or “Recipient”) hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the “Act”), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the “Regulations”), and other pertinent directives. No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which PART receives Federal
financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically, and without limiting the above general assurance, PART hereby gives the following specific assurances with respect to its Federal Transit Administration program:

a) That PART agrees that each “program” and each “facility”, as defined in subsections 21.23(e) and 21.23(b) of the Regulations will be (with regard to a “program”) conducted, or will be (with regard to a “facility”) operated, in compliance with all requirements imposed by, or pursuant to, the Regulations.

b) That PART shall insert the following notification in solicitations for sealed bids and request for proposals for large procurements related to work or material subject to the Regulations and made in connection with all Federal Transit Administration programs and, in adapted form in all proposals or negotiated agreements:

*The Piedmont Authority for Regional Transportation, in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders/proposers that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to the invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.*

c) That PART shall insert the applicable clauses as per the most recent version of the FTA’s Best Practices Procurement Manual in every contract subject to this Act and the Regulations.

d) That PART shall include the appropriate clauses as per the most recent version of the FTA’s Best Practices Procurement Manual as a covenant running with the land, in any deed from the United States affecting a transfer of real property, structures, or improvements thereon, or interest therein.

e) That where PART receives Federal financial assistance to construct a facility, or part of a facility, the assurance shall extend to the entire facility and facilities operated in connection therewith.

f) That where PART receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the assurance shall extend to rights to space on, over or under such property.

g) That PART shall include the appropriate clauses as per the most recent version of the FTA’s Best Practices Procurement Manual as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by PART with other parties: (a) for the subsequent transfer of real property acquired or improved under Federal
Transit Administration programs; and (b) for the construction or use of, or access to, space on, over, or under real property acquired, or improved under Federal Administration programs.

h) That this assurance obligates PART for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of personal property or real property or interest therein or structures or improvements thereon, in which case the assurance obligates PART or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which PART retains ownership or possession of the property.

i) PART shall provide for such methods of administration for the programs as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations and this assurance.

j) PART agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Act, the Regulations, and this assurance.

k) PART assures that the level and quality of transit service and related benefits are provided in a manner consistent with the Title VI of the Civil Rights Act of 1964.

l) PART assures that the public will be given notice and engaged in a public hearing for service and fare adjustments in accordance with the adopted PART policy.

THESE ASSURANCES are given in consideration of, and for the purpose of, obtaining any and all Federal grants, loans, contracts, property, discounts or other Federal financial assistance extended after the date hereof to the Piedmont Authority for Regional Transportation by the United States Department of Transportation under the Federal Administration and is binding on it, other recipients, subgrantees, contractors, transferees, successors in interest and other participants in the Federal Transit Administration programs.

The person whose signature appears below is authorized to sign these assurances on behalf of PART.

___________________________________________________
Scott W. Rhine
Executive Director

September 14, 2016
IV. GENERAL GUIDELINES/REQUIREMENTS

a. Annual Certification and Assurance

As stated in Section I, PART shall submit annually, its Title VI assurance, as part of its annual Certification and Assurance submission to the FTA. The most recent submission for PART was executed and submitted to the FTA March 28, 2016.

b. Complaint Procedures

In compliance with 49 CFR Section 21.9(b), PART has developed procedures for investigating and tracking Title VI complaints filed against them. Such procedures shall be made available to the public upon request. PART’s complaint procedures and complaint form are contained herein as APPENDIX A.

c. Record Title VI Activities

In compliance with 49 CFR Section 21.9(b), PART shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming PART that allege discrimination on the basis of race, color, or nation origin. Such list shall include:

1) Date the investigation, lawsuit, or complaint was filed;

2) Summary of the allegation(s);

3) The status of the investigation, lawsuit, or complaint; and

4) Actions taken by PART in response to the investigation, lawsuit or complaint.

d. Access for LEP Persons

PART shall take steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). PART will assist persons with limited English proficiency to participate in the transportation planning process. PART Staff will make every effort to provide translators and document translation, where feasible, upon request. PART’s Limited English Proficiency (LEP) Plan is contained herein as APPENDIX B.

e. Public Notification

In compliance with 49 CFR Section 21.9(d), PART shall provide information to the public regarding its Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI by the following notice:
Title VI Civil Rights Notice to Public

The Piedmont Authority for Regional Transportation is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. It is PART’s objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

PART is committed to a policy of non-discrimination in the conduct of its business; including, adherence to Title VI responsibilities and the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with PART.

Any such complaint must be in writing and submitted to the PART Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discrimination. A Title VI Civil Rights Complaint Form is available by calling (336) 662-0002 or from our website www.partnc.org. Complaints should be addressed to: PART Title VI Compliance Officer, 107 Arrow Rd., Greensboro, NC 27409.

The PART Notice of Rights under Title VI to the public, shown above, is available at the PART office and Regional Transfer facility. It is also posted on all PART vehicles and in select printed materials, including but not limited to the PART map/schedule.

f. Additional Information

PART acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C 4702.1B, may be requested in writing of PART, to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

g. Timely Submission

PART acknowledges that its Title VI submissions and/or updates thereto, shall be supplied to its FTA Regional Office once every three (3) years. The submission shall include, but is not limited to: Portions of the Plan which have not changed since the last submission will not be resubmitted, however, PART shall include a statement to this effect in lieu of copies of the original documents in order to eliminate redundancy in resubmissions.
1. A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities;
2. PART’s process for persons with Limited English Proficiency (LEP)
3. Title VI complaint and Tracking procedures;
4. A list of any Title VI investigations, complaints or lawsuits filed since the latest submission; and
5. A copy of PART’s public notice regarding Title VI compliance and public access and instructions to PART Title VI complaint procedures.

h. Environmental Analysis of Construction Projects

PART shall integrate an environmental justice analysis into its National Environmental Policy Act (NEPA) documentation of construction projects of which require NEPA. If a Categorical Exclusion (CE) is performed, PART shall complete the FTA’s standard CE checklist which includes a section on community disruption and environmental justice. While preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), PART shall integrate into its documents, the following:

1) A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population;

2) A discussion of all adverse effects that would affect the identified minority and low-income population;

3) A discussion of all positive effects that would affect the identified minority and low-income population;

4) A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project, if applicable;

5) A discussion of the remaining effects, if any, and why further mitigation is not proposed; and

6) For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison will be completed of mitigation and environmental enhancement actions between the two stated areas. If there is no basis for such a comparison, PART shall
describe why this is so.

i. Public Participation

PART shall seek out and consider viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities in regards to proposed transportation decisions. PART shall make every effort to include the following practices, consistent with Burlington, Greensboro, High Point, and Winston-Salem Urbanized area Metropolitan Planning Organization’s adopted public participation plan; not withholding the public participation plan adopted by the PART Board of Trustees:

1. Coordination with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low income communities;

2. Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments;

3. Utilization of locations, facilities and meeting times that are convenient and accessible to low-income and minority communities;

4. Utilization of different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities; and

5. Implementation of DOT’s policy guidance regarding PART’s responsibilities to LEP persons.

j. Public Hearing Process for Service and Fare Changes

PART will advertise in accordance with the PART Board Policy regarding public participation to conduct any public hearing when considering proposed fare and major service changes. Public hearings are a key element of the decision making process used by the PART Board of Trustees to assess the potential impact proposals may have on the Piedmont Authority for Regional Transportation riders and residents of the Piedmont Triad Region.

1. PART Organizational Units Affected
   • PART Express division is responsible for coordinating public hearings related to major service changes.
   • PART Finance and Administrative division is responsible for coordinating public hearings related to fares and fare media pricing.
   • The Clerk of the PART Board is responsible for providing notice and recording of the public hearing.

2. Policy
Public Hearings will be scheduled by the PART Board of Trustees for fare and major service change proposals except as otherwise provided below.

3. Definitions
- A major service and fare change is any change or series of changes that directly affect:
  - 25 percent or more reduction of transit route revenue hours of PART Express system-wide service.
  - 50 percent or more reduction of transit route revenue hours of a single PART Express corridor service computed on an annual basis.
  - The implementation of a new transit corridor route.
  - 25 percent or more on the implementation of a passenger fare adjustment on an annual basis.

4. Procedure
- Proposed major service changes and fare and fare media pricing shall be evaluated for compliance with the Federal Transit Administration’s (FTA) Office of Civil Rights guidance regarding potential discriminatory impacts on minority and low income populations. The evaluation will include proposed actions the PART may apply to minimize, mitigate, or offset the adverse effects the changes could have on these populations, as described in FTA Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines.”

- Prior to the institution of a fare change or major service change, a notice of intent to hold a public hearing will be published following the PART Board adopted public participation policy. The notice will also be published in newspapers oriented to specific groups or neighborhoods that may be affected.

- The notice will be published at least 30 days prior to the hearing.

- The notice will contain descriptions of the changes and the time and place of the hearing.

- A service/Fare Equity Analysis Report will be completed and filed with the PART administrative office.

- PART shall ensure that all programs, services, activities, and benefits are implemented without discrimination. Any person who believes that he or she, individually, or as a member of any specific class or persons, has been subjected to discrimination on the basis of race, color, national origin, or other protected class interests, may file a signed written complaint with PART, the FTA, or the Secretary of Transportation at the addresses listed below:
  - Supriya Raghav, Regulatory Affairs Specialist
    Piedmont Authority for Regional Transportation
    107 Arrow Rd.
    Greensboro, NC 27409
  - Federal Transit Administration Region IV
    Office of Civil Rights
If you are unable or incapable of providing a written statement and desire PART or the FTA to investigate alleged discrimination, a verbal complaint of discrimination may be made. You may call PART at 336/662-0002 or 1-800-588-7787. The complainant will be interviewed by an appropriate office authorized to receive complaints. If necessary, the official will assist the complainant in converting verbal complaints in writing. All Complaints must be signed by the complainant or his/her representative.

5. Exceptions
   A. Changes in fares and fare media pricing are subject to public hearing requirements with the exception of the following:
      • One-Day reduced fare
      • Free-fare promotions

   B. Service changes are subject to public hearing requirements with the exception of the following:
      • Standard seasonal variations.
      • Changes instituted in response to an emergency situation in effect for 90 days or less.
      • Experimental service changes instituted for 180 days or less.

Nothing in this section precludes the PART Board of Trustees from setting a public hearing on any matter associated with fares and service that it chooses.

6. Provisions and Conditions
   Not applicable

7. Related Documents
   FTA Circular 4702.1A, Title VI and Title VI-Dependent Guidelines, March 8, 2011 FTA “Dear Colleague” letter.

The person whose signature appears below is authorized to sign on behalf of PART.

September 14, 2016
Scott W. Rhine, Executive Director
Piedmont Authority for Regional Transportation
k. **Plan Monitoring and Evaluation**

Evaluation of the success of any public involvement efforts must be result-oriented. It is never safe to assume that just because people don’t come to an event that they are uninterested in the project. The goal is to educate and include the public at all levels of planning, not just to invite them. Evaluation, then, must be two-fold. The first part is to track what efforts are being made, and the results of those efforts, and the second part is to make regular assessments of the success of a technique within a given program, and to strategize for future successes.

**Tracking Efforts and Success**

In order to track our public participation efforts, it is necessary that the individuals involved record their efforts.

1. PART will keep a log of their outreach activities.
2. Copies should be kept of any print ads, and transcripts of any public service announcements.
3. Notes should be made after the meeting regarding the overall tone of the meeting and any ideas or observations made regarding the process.

**Efforts of Monitoring and Evaluation of the LEP Plan**

1. Provide day-to-day administration of PART’s LEP Plan, ensuring compliance and correct implementation.
2. Seek feedback from LEP communities, including customers and community-based organizations, about the effectiveness of PART’s LEP Plan.
   - Translate PART’s Title VI complaint procedure and form in multiple languages.
   - Establish a PART procedure that requires all written translation requests be routed through and managed by the Title VI coordinator to ensure consistency.
   - Conduct an evaluation every 3 years of PART’s LEP Plan to gauge its effectiveness and determine if updates are needed. PART staff will lead the evaluation with the help of staff familiar with Title VI language access requirements and the LEP Plan. The evaluation may include the following:
     - Determine the number of LEP individuals in PART’s service district.
     - Assess whether existing language assistance services are meeting the needs of LEP persons.
     - Assess whether staff members understand PART’s LEP Plan, how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible.
   - Create one-stop LEP information center for PART employees.
I. Service Standards

Vehicle Load Standard – PART operates regional commuter bus transportation services throughout a 10 county region. Due to work shifts that vary the Vehicle Load Standard is applied equally between peak and off-peak times. Also, with limited service for Saturday and Sunday PART applies the same standard for weekend service as well. The average of all loads during the peak and off-peak operating periods should not exceed a load factor of 1.4. With the 24’ mini-bus this represents 18 seated, 7 standing for a total of 25 passengers. For the 35’ low floor bus this represents 31 seated, 12 standing for a total of 43 passengers. For the 40’ low floor bus this represents 39 seated, 15 standing for a total of 54 passengers.

<table>
<thead>
<tr>
<th>Vehicle Type</th>
<th>Average Passenger Capacities</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Seated</td>
<td>Standing</td>
</tr>
<tr>
<td>24’ mini-bus</td>
<td>18</td>
<td>7</td>
</tr>
<tr>
<td>35’ low floor bus</td>
<td>31</td>
<td>12</td>
</tr>
<tr>
<td>40’ low floor bus</td>
<td>39</td>
<td>15</td>
</tr>
</tbody>
</table>

Vehicle Headways – Weekday PART service operates to and from four primary transportation centers. They include the Winston-Salem Transportation Center, the Greensboro Depot, the High Point Broad Ave. Terminal and the PART Hub near the PTI Airport. On the primary urban routes during peak hours the most frequent service is provided on 30 minute headways. For urban routes during off-peak times frequency is provided every 60 minutes. For the rural areas during peak hours the most frequent service is provided on 36 minute headways. During off-peak time for rural area routes service is provided at various times ranging from 180 minutes to no service during off-peak times. During weekday service PART also provides shuttle service from the PART Hub to businesses in and around the PTI Airport area on 30 minute headways. This service is provided during peak, off-peak and evening hours of operation.

Weekend PART service is limited to one route traveling between Winston-Salem and High Point providing service to the Amtrak train station. Three round trips are provided each Saturday and Sunday with frequency every 5 hours.
### Headways and Periods of Operation

<table>
<thead>
<tr>
<th>Weekdays</th>
<th>Peak</th>
<th>Off-Peak</th>
<th>Evening</th>
</tr>
</thead>
<tbody>
<tr>
<td>Urban Express</td>
<td>30</td>
<td>60</td>
<td>30</td>
</tr>
<tr>
<td>Rural Express</td>
<td>36</td>
<td>180</td>
<td>--</td>
</tr>
<tr>
<td>Shuttles</td>
<td>30</td>
<td>30</td>
<td>30</td>
</tr>
</tbody>
</table>

*Peak 6 am – 9 am, 3 pm – 6 pm, Off-Peak 9 am – 3 pm, Evening 6 pm – 7 pm, “—” no service.*

<table>
<thead>
<tr>
<th>Weekends</th>
<th>AM Peak</th>
<th>Mid-day</th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amtrak Connector</td>
<td>1 trip</td>
<td>1 trip</td>
<td>1 trip</td>
</tr>
</tbody>
</table>

### On-Time Performance Standard

On-Time Performance Standard – PART Express routes are to be considered on time if they are no more than “1” minute early and no more than “5” minutes late. The on-time performance goal is set at 95% or greater. PART will continuously monitor the various routes throughout the system to maintain this standard.

### Service Availability Standard

Service Availability Standard – PART Express routes are designed to provide access to routes throughout a 10 county region. Access is made available through the use of Park & Ride Lots and direct stops along a route. Due to the nature of “express” service stops are limited along the routes due to the vehicles traveling on the highway system in the region. Major employment centers, central business districts, schools, universities and hospitals are target areas for the routes. Strategic corridors for the regions highway system are also used to enhance the efficiency of the service to the region.
APPENDIX A

TITLE VI COMPLAINT PROCEDURES

Title VI Information, Limited English Proficient (LEP) information and Complaint Process (for printed materials, website, and other mediums upon request)

The Piedmont Authority for Regional Transportation (PART) grants all citizens equal access to all its transportation services. It is further the intent of PART that all citizens are aware of their rights to such access. This is designed to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefits of PART’s programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI? Title VI is a section of the Civil Rights Act of 1964 requiring that “No person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

What is LEP? As part of Title VI requirements, PART has developed a Limited English Proficiency (LEP) Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to PART services as required by the Federal Transit Administration “Improving Access to Services for Persons With Limited English Proficiency,”. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

PART’s Complaint and Investigation Procedures These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by PART.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and PART may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:
Title VI Complaint Procedure

1. Title VI complaint forms may download from www.partnc.org or requested from (PART). The complainant may also submit a written statement that contains all of the following information:
   a. Name, address, and telephone number of the complainant.
   b. The basis of the complaint (race, color, national origin).
   c. The date or dates on which the alleged discriminatory event or events occurred.
   d. The nature of the incident that led the complainant to feel discrimination was a factor.
   e. Names, addresses and telephone numbers of persons who may have knowledge of the event.
   f. Other agencies or courts where complaint may have been filed and a contact name.
   g. Complainant’s signature and date.

2. If the complainant is unable to write a complaint, PART staff will assist the complainant. If requested by complainant, PART will provide a language or sign interpreter.

3. Complainants have the right to complain directly to the appropriate federal agency. Complaints must be filed within one-hundred eighty (180) calendar days of the last alleged incident.

4. PART will begin an investigation within fifteen (15) working days of receipt of a complaint.

5. PART will contact the complainant in writing no later than thirty (30) working days after receipt of complaint for additional information, if needed. If the complainant fails to provide the requested information in a timely basis, PART may administratively close the complaint.

6. PART will complete the investigation within ninety (90) days of receipt of the complaint. If additional time is need for investigation, complainant will be contacted. A written investigation report will be prepared by the investigator. This report shall include a summary description of the incident, findings and recommended corrective action.

7. A closing letter will be provided to the complainant and the respondent or respondent department. Parties will have five (5) working days from receipt of the closing letter to appeal. If neither party appeals, the complaint will be closed.

8. If required, the investigation report will be forwarded to the appropriate federal agency.

Federal Transit Administration Region 4 Attn: Regional Civil Rights Officer Frank Billue 230 Peachtree Street, NW, Suite 800 Atlanta, GA 30303 Telephone 404-865-5628 Fax 404-865-5605
FTA Complaint procedures can also be found on the FTA web site at: [www.fta.dot.gov](http://www.fta.dot.gov). These procedures are also outlined in FTA Circular 4702.1A, Chapter IX.

PART strongly encourages the use of the attached **PART Title VI Complaint Form** when filing official complaints. The preferred method is to file your complaint in writing using the **PART Title VI Complaint Form**, and send it to:

Title VI Coordinator: Piedmont Authority for Regional Transportation, 107 Arrow Rd., Greensboro NC 27409
Title VI Civil Rights

Complaint Form

Section I

Name: _______________________________________________________________

Address: ______________________________________________________________________

Street __ City __ State __ Zip

Telephone Numbers:

Home: ___________________ Work: ___________ Other: ________________

E-Mail Address: ______________________________________________________________

Accessible Format Requirements?

Large Print: Yes_____ No ______ Audio Tape: Yes ______ No ______

TDD: Yes ______ No _______________ Other: ______________________________

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations", and the Department of Transportation's Guidance to Recipients on Special Language Services to Limited English Proficient (LEP) Beneficiaries.

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 not, please supply the name and relationship of the person for whom you are complaining:

Name: ___________________________ Relationship: _______________________________

Please explain why you have filed for a third party. _______________________________________

______________________________________________________________________________

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes ________ No ________________.
Section III

Have you previously filed a Title VI complaint with PART? Yes _____ No _____

If yes, what was your PART Complaint No? ________________________________

(Note: This information is needed for administration purposes; we will assign the same complaint number to the new complaint.)

Have you filed this complaint with any of the following agencies? Yes ______ No ______

(If you answered yes, who did you file the complaint with?)

Federal Transit Administration: ______ U. S. Department of Transportation: ______

North Carolina Dept. of Transportation: ______ Department of Justice: ______

Equal Employment Opportunity Commission: ______

Have you filed a lawsuit regarding this complaint? Yes ______ No ______

If yes, please provide a copy of the complaint form. (Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we defer to the decision of the Court.)

Section IV:

Complaint is against: _______________________________________________________

Contact Person: ________________________________ Title: _________________________

Telephone Number: _____________________________

Attached is a blank sheet of paper to describe your complaint. Please use additional sheets if necessary.

Section V:

Please sign here: _________________________________________ Date: _____________

(Note: We cannot accept your complaint without a signature)

Please mail your completed form to:

PART
Title VI Compliance Officer
107 Arrow Rd.
Greensboro, NC 27409

COMPLAINT DESCRIPTION
(You should include specific details such as names dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations.)
APPENDIX B

Limited English Proficiency (LEP) Plan

Introduction

The PART Express System, operated by the Piedmont Authority for Regional Transportation (PART), understands that transportation is critically important to the daily lives of our community members. The purpose of this limited English proficiency plan is to comply with PART’s responsibilities to limited English proficient (LEP) persons consistent with Title VI of the Civil Rights Act of 1964 and its implementing regulations. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, provides that no person shall be subjected to discrimination on the basis of race, color or national origin under any program or activity that receives federal financial assistance.

In cooperation with the Cities of Greensboro, High Point, Winston-Salem, and the Counties of Alamance, Davidson, Davie, Forsyth, Guilford, Randolph, Rockingham, Stokes, Surry, and Yadkin PART Express provides services to connect locally operated public transit services. PART is not a direct recipient of Section 5307 funds to urbanized areas, but fully implements the provisions of federal and state guidance to meet the requirements to provide public transit services.

Purpose

The purpose of this policy plan is to ensure compliance with Title VI of the Civil Rights Act of 1964. “Improving Access to Services for Persons With Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination.

All federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the Piedmont Authority for Regional Transportation, private and non-profit entities, and sub recipients.

Plan Summary

PART has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to PART services as required by Federal Transit Administration. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP
persons that assistance is available, and information for future plan updates.

Definitions

Limited English Proficiency (LEP) individual – Any prospective, potential, or actual recipient of services from PART who cannot speak, read, write or understand the English language at a level that permits them to interact effectively with agency staff.

Vital Documents – Forms that include, but are not limited to; applications consent forms, letters containing important information regarding participation in a program, notices pertaining to the reduction, denial, or termination of services, the right to appeal such actions, or that require a response from notices advising LEP persons of the availability of free language assistance, and other outreach materials.

Title VI Compliance Officer – The PART point of contact concerning Title VI related items.

Substantial number of LEP – 5% or 4,500 people, whichever is smaller, are prospective, potential or actual recipients of service and speak a primary language other than English and have Limited English Proficiency or who cannot read, write or understand the English language at a level that permits them to interact effectively with PART staff.

Demography

The Piedmont Authority for Regional Transportation does not supersede, but compliments local transit services in the Piedmont Triad Region of North Carolina. The PART territory includes four metropolitan areas as defined by US Census metropolitan planning statistical areas, and ten counties. The following information is based on 2010 Census information compiled and maintained at PART.

The PART territorial jurisdiction had a population of 1,610,926 individuals (2014 American Community Survey 5 year data). The race and ethnic breakout is as follows:
### Race

<table>
<thead>
<tr>
<th>Race</th>
<th>Total</th>
<th>Percentage of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>White/Caucasian</td>
<td>1154278</td>
<td>71.7</td>
</tr>
<tr>
<td>African American</td>
<td>336128</td>
<td>20.9</td>
</tr>
<tr>
<td>American Indian / Alaskan Native</td>
<td>6483</td>
<td>0.4</td>
</tr>
<tr>
<td>Asian</td>
<td>35597</td>
<td>2.2</td>
</tr>
<tr>
<td>Hawaiian / Pacific Islander</td>
<td>794</td>
<td>0.0</td>
</tr>
<tr>
<td>Other</td>
<td>47249</td>
<td>2.9</td>
</tr>
<tr>
<td>Two or more races</td>
<td>30,397</td>
<td>1.9</td>
</tr>
</tbody>
</table>

### Hispanic or Latino Population

<table>
<thead>
<tr>
<th>Hispanic/Latino</th>
<th>Total</th>
<th>Percentage of Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hispanic/Latino</td>
<td>145,099</td>
<td>9.0</td>
</tr>
</tbody>
</table>

Ninety-two and a half percent of the region’s population is White or African American ethnicity. Hispanic/Latino persons represent 9% of the population of the PART region.

7.65% of the population in the PART territory is foreign born, with 6.25% of those entering the region after 2010. 11.2% of the population 5 years of age or older in the PART territory speaks a language other than English at home and of that group 46.7% speak English less than “very well.” The following information is based on the 2014 American Community Survey 5-year data sets for the PART territory.

**PART Service Area Population who are:**

<table>
<thead>
<tr>
<th></th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish speakers</td>
<td>7.8</td>
</tr>
<tr>
<td>Spanish speakers who speak English less than “very well”</td>
<td>50.6</td>
</tr>
<tr>
<td>Indo-European language speakers (other than English only speakers)</td>
<td>1.4</td>
</tr>
<tr>
<td>Indo-European speakers who speak English less than “very well”</td>
<td>27.8</td>
</tr>
<tr>
<td>Asian &amp; Pacific Island (PI) languages speakers</td>
<td>1.5</td>
</tr>
<tr>
<td>Asian &amp; PI language speakers who speak English less than “very well”</td>
<td>48.7</td>
</tr>
<tr>
<td>Speakers of languages not mentioned above</td>
<td>0.5</td>
</tr>
<tr>
<td>Other languages speakers who speak English less than “very well”</td>
<td>35.2</td>
</tr>
</tbody>
</table>

Data from the 2014 American Community Survey 5-year data sets reveal the highest numbers of LEP persons in the PART region speak these 4 languages and 1 language group in their households—ranked in order of highest to lowest:

<table>
<thead>
<tr>
<th>Language (group*)</th>
<th># of Persons</th>
<th>% of Persons in Urbanized Areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>59,944</td>
<td>72%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>3,289</td>
<td>95%</td>
</tr>
<tr>
<td>Chinese</td>
<td>1,826</td>
<td>78%</td>
</tr>
<tr>
<td>An African Language*</td>
<td>1,625</td>
<td>97%</td>
</tr>
<tr>
<td>Mon-Khmer</td>
<td>1,364</td>
<td>100%</td>
</tr>
</tbody>
</table>
Household Language by Linguistic Isolation

The data below is gathered from 2014 American Community Survey 5-year data sets.

A "limited English speaking household" is a household in which no household member who is 14 years old and older speaks English only or speaks English "very well". In other words, all members 14 years old and over have at least some difficulty with English.

- Of all households: 2.56%
- Of Spanish speaking households: 30.60%
- Of non-Spanish Indo-European languages speaking households: 10.33%
- Of Asian and Pacific Island languages speaking households: 24.48%
- Of households speaking other languages: 17.79%

The data available from the American Community Survey; shows that the PART region’s linguistically isolated households are primarily in urbanized areas.

As demonstrated through the data above, the greatest non-English speaking community in the Piedmont Triad is composed of Spanish speakers, followed by Vietnamese and other Asian language speakers.
The map above shows the distribution of individuals with limited English proficiency in PART member counties. The visualization was created by randomly distributing dots, each representing a person, within their home Census Block Group. The map is a supplement to the tables in this report and helps to identify concentrations of LEP individuals in our region.

**Frequency of Contact**
Historically PART’s ridership has been predominantly whites and blacks. The last customer satisfaction survey, conducted in 2014, consisted of 59.7% white and 30.5% black respondents. This would infer a very low percentage of LEP persons using the system. As shown on the map, the concentrations of LEP persons are in the urban area where 82.4% of the systems revenue miles occur. This highlights a great opportunity for outreach to the LEP population. As our communities grow and interactions with LEP persons increases PART wishes to ensure appropriate measures are taken to communicate effectively with persons needing language assistance.

The following pages lists the details of implementing, maintaining, and monitoring PART’s LEP program plan to ensure federal compliance and meaningful service available to all non-English speakers using PART services.

PART will use a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the PART service area who may be served or likely to encounter a PART program, activity, or service; 2) the frequency with which LEP individuals come in contact with a PART service; 3) the nature and importance of the program, activity or service provided by PART to the LEP population; and 4) the resources available to PART and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

**Four Factor Analysis**

1. **The number or proportion of LEP persons eligible in PART service territory who may be served or likely to encounter a PART program, activity, or service.**

PART has examined US Census data to determine the demographic makeup of the community. The number and proportion of Limited English Proficiency (LEP) persons is detailed on the previous pages for the PART territory, and PART will continue our contact with social services agencies and metropolitan planning organizations in PART service territory to keep this information up to date and accurate.

2. **The frequency with which LEP individuals come in contact with a PART program, activity, or service.**

While we understand anecdotally that LEP persons use PART services, the frequency is low. This is based on the low numbers of complaints, requests, and failed communication efforts experienced by the PART staff.

PART will assess the frequency at which staff, PART drivers, and customer service
employees have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying PART drivers. PART has never had a request for interpreters, despite publishing notices that translators will be made available upon request, and no requests for translated documents.

3. The nature and importance of the program, activity, or service provided by PART to the LEP community.

PART understands that transportation is critically important to the daily lives of our community members. Certain aspects of our services are of critical importance and this plan will be used to meet the needs of the LEP community. These include services such as: construction projects; property acquisitions; and transit fare, service area or level changes.

4. The resources available to PART and costs.

PART has identified in-house staff with other language abilities and this staff has some availability to assist with requests related to PART services, including transit. The PART schedule will be formatted and made available in Spanish, but most printed materials, paid advertisements, brochures, and website pages are produced in English only. It would be possible to produce these materials in Spanish and other languages with assistance from a professional translation service, this would be done upon request or as needed. To make public meetings available to LEP persons, volunteer translators are available through University of North Carolina - Greensboro (UNCG). This resource could also be used to provide translation for written materials in Spanish or other languages.

Implementation Methods

• **How to Identify an LEP Person who Needs Language Assistance** - These methods may be used to help identify persons who may need language assistance:
  • Communicate and coordinate with the 4 MPO’s of our territorial jurisdiction.
  • Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings;
  • When public meetings are held, have a staff member greet and briefly speak to each attendee. To informally gauge the attendee’s ability to speak and understand English, ask a question that requires a full sentence reply;
  • Provide US Department of Justice “I Speak” cards at public meetings. While staff may not be able to provide translation assistance at this meeting, the cards will be used to identify language needs for future meetings; and
  • Regularly survey PART drivers and other first line staff of any direct or indirect contact with LEP individuals.
• **Language Assistance Measures** - PART may implement the following LEP procedures, as appropriate:

  - PART has identified in-house staff with other language abilities and this staff has some availability to assist with requests related to PART services, including transit;
  - Public notice, publications, and other printed material, including webpage content, may be made available in other languages;
  - Utilize translators at select public meetings; and
  - Use a telephone translation service such as AT&T’s Language Line, and web translation applications such as Alta Vista.

• **Training** – Training for PART and contractor staff on all aspects of the Title VI and LEP will be conducted. Prior to public meetings at which LEP individuals are anticipated to attend, staff will review the Title VI Plan, including this LEP section. PART will also incorporate where applicable the Title VI efforts conducted by the regions urban operators and MPOs.

• **Outreach** – Specific outreach efforts will be evaluated on a case-by-case basis. Some or all of the following methods may be used:

  - Posters and brochures will be made available through local churches, social service agencies, ethnic retail outlets, the school district office, Local Universities and Community Colleges, MPO offices, local DOT’s, the local libraries and other locations.
  - Other printed materials, such as transit schedules and maps, will be translated and made available at the PART transportation center and available upon request from the PART office.
  - Paid advertisements and the PART website will indicate ways in which LEP persons can access information about our services.
  - If staff knows that they will be presenting a topic that could be of importance to an LEP individual or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.

**Monitoring and Updating the LEP Plan**

This plan is designed to be flexible and is one that can be easily updated. At a minimum, PART will follow the Title VI Program update schedule for the LEP plan. The following information was compiled by PART is based on 2010 Census and the 2014 American Community Survey. Future plan updates will include the most current data available. The results may change based on the timing of the plan update.

Each update will examine all plan components such as:
• How many LEP persons were encountered?
• Were their needs met?
• What is the current LEP population in PART service area?
• Has there been a change in the types of languages where translation services are needed?
• Is there still a need for continued language assistance for any previously identified PART programs? Are there other programs that should be included?
• Have PART’s available resources, such as technology, staff, and financial costs changed?
• Has PART fulfilled the goals of the LEP Plan?
• Were any complaints received?

**Dissemination of the LEP Plan**

Copies of the LEP plan will be on file at the PART office. The LEP plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. The plan will also be available on the PART website.

Any questions or comments regarding this plan should be directed to PART’s Title VI Compliance Officer.

PART Title VI Compliance Officer / Affirmative Action Officer  
107 Arrow Road  
Greensboro, NC 27409

Phone: 336-662-0002  
Fax: 336-662-9253  
Email: supriyar@partnc.org