



2022

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 1400
Atlanta, GA 30303

RECIPIENT INFORMATION

RECIPIENT: Piedmont Authority for Regional Transportation (PART)

SUBMITTAL DATE: September 27, 2022

PROGRAM UPDATE: October 1, 2022, for the incorporation of FTA policy and Governing Board adoption on a minimum three-year period.

EXPIRATION YEAR: 2025

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**PIEDMONT AUTHORITY FOR REGIONAL TRANSPORTATION
ADOPTION OF UPDATED TITLE VI PROGRAM**

WHEREAS, 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 Certifications and Assurances 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 21.7, and as amended.
- 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; and

WHEREAS, PART will update and amend the Title VI Program Policy and applicable Plan as needed to incorporate required FTA and USDOT policies to adhere to the compliances expected for maintaining a FTA approved program policy; and

WHEREAS, the PART Board of Trustees recognize the action taken to update the PART Title VI program is to incorporate the FTA program policies regarding operational service and fare equity analysis requirements for the public transportation services provided to the general public.

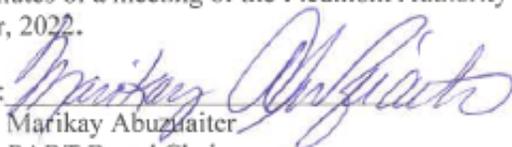
NOW THEREFORE BE IT RESOLVED, the PART Board of Trustees hereby adopt the amended PART Title VI Program Policy and associated Plan to incorporate the provisions established by the Federal Transit Administration related to operational service and fare equity analysis.

BE IT FURTHER RESOLVED, the PART Board of Trustees authorizes the PART CEO/General Manager to sign the amended Title VI Program Plan.

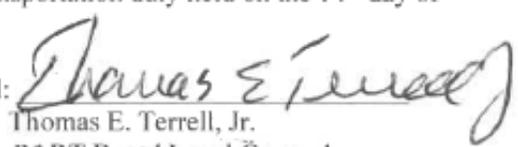
.....
A motion was made by Mark Richardson and seconded by Jim Butler for adoption of the above resolution, and upon being put to a vote was duly adopted on this 14th day of September, 2022.
.....

I, Marikay Abuzuaiter, PART Chairperson do hereby certify that the above is a true and correct copy of an excerpt for the minutes of a meeting of the Piedmont Authority for Regional Transportation duly held on the 14th day of September, 2022.

Approved:


Marikay Abuzuaiter
PART Board Chairperson

Witnessed:


Thomas E. Terrell, Jr.
PART Board Legal Counsel

Attest:


Brigitte Davern
Clerk to the Board

Seal:



PROVISION OF TITLE VI ASSURANCES

The Piedmont Authority for Regional Transportation (PART) hereby certifies that, in accordance with 49 CFR Section 21.7(a), it will ensure that:

1. PART shall submit, on an annual basis, its Title VI Assurances, as part of its annual Certification and Assurances submission to the FTA
2. 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
3. PART will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1B
4. PART will make it known to the public that 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.

I. TITLE VI COMPLIANCE HISTORY

1. 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.
2. 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.
3. There are currently no pending construction projects which would negatively impact minority communities being performed by PART.

II. 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:

1. 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.
2. 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.

3. 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.
4. 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 herein.
5. 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.
6. 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.
7. 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.
8. 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.
9. 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.
10. 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.
11. 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.

12. 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
CEO/General Manager

September 14, 2022

Date

GENERAL GUIDELINES/REQUIREMENTS

I. 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 10, 2022.

II. 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](#).

III. 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. contained herein as [APPENDIX B](#). 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
4. Actions taken by PART in response to the investigation, lawsuit or complaint

IV. 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 D](#).

V. 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:

NOTICE of RIGHTS UNDER TITLE VI

The Piedmont Authority for Regional Transportation (PART) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with PART. 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**

For more information PART's civil rights program and the procedures to file a complaint, call 336-662-0002; email contactus@partnc.org; visit our website, www.partnc.org; or visit our administrative office at 107 Arrow Road, Greensboro, NC 27409. Any 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 unlawful discriminatory practice.

A complainant may file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

**If information is needed in another language, contact 336-662-0002.
Si necesita información en otro idioma, contacto 336-662-0002.**

The PART Notice of Rights under Title VI to the public, shown above, is available at the PART office and Coble Transportation Center. It is posted at the PART Administrative Office, the Coble Transportation Center and on PART fixed-route vehicles.

VI. 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.

VII. Timely Submission

PART acknowledges that its Title VI submissions and/or updates thereto, shall be supplied to its FTA Regional Office of Civil Rights once every three (3) years. The submission shall include but is not limited to:

1. A summary of public outreach and involvement activities undertaken since the last submission and a description of any steps taken to ensure that minority and low-income people had meaningful access to these activities (note: during the period of 2019 and 2022 Covid greatly affected the amount and subject matter of our outreach efforts) [APPENDIX C](#)
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.
5. A copy of PART's public notice regarding Title VI compliance and public access and instructions to PART Title VI complaint procedures

VIII. 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

And if applicable:

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

IX. 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 regard to proposed transportation decisions. PART shall make every effort to include the following practices, consistent with the Burlington-Graham, Greensboro, High Point, and Winston-Salem Urbanized Area Metropolitan Planning Organization's (MPOs) adopted public participation plans; 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
5. Implementation of DOT's policy guidance regarding PART's responsibilities to LEP persons

PART Outreach and Involvement Activities Route Adjustments Oct 2019 - Sept 2022

Each time PART planned for route adjustments on PART Express routes, public outreach activities were designed and accomplished. For route adjustments, announcements were made 30 days prior to the adjustment to encourage feedback from passengers, a draft of the route schedule was posted to the website. A survey or communication channel was established for passengers to provide their feedback and then those comments were analyzed and taken into consideration. The public was made

aware of route adjustments through various channels including public notice on website, notice in newspaper (as necessary), social media announcements, email announcements, text messages, signage at bus stops, and flyers on buses. Final adjustments were then prepared and presented to the PART Board of Trustees to have a vote and establish the date the route adjustments would become effective. We encourage the public to attend any PART Board meeting. A two to three-week period of time was provided for passengers to see the final route adjustments, ask questions, and understand the service prior to it becoming effective. Announcements of final route adjustments were made through similar channels as the initial announcement to encourage passengers to view final route schedules. See [APPENDIX C](#) for a summary list of dates over the past 3 years that PART has adjusted routes or fares.

X. 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
2. PART Express, and Planning divisions are responsible for coordinating public hearings related to major service changes.
3. PART Finance and Administrative division is responsible for coordinating public hearings related to fares and fare media pricing.
4. The Clerk of the PART Board is responsible for providing notice and recording of the public hearing.

Policy

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

Definitions

A major service or fare change is any change or series of changes that directly affect:

1. 25 percent or more reduction of transit route revenue hours of PART Express system-wide service.
2. 50 percent or more reduction of transit route revenue hours of a single PART Express corridor service computed on an annual basis.
3. The implementation of a new transit corridor route.
4. 25 percent or more on the implementation of a passenger fare adjustment on an annual basis.

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 4702.1B, "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.

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 or FTA at the addresses listed below:

- CEO/General Manager and/or
Director of Commuter Operations
Piedmont Authority for Regional Transportation
107 Arrow Rd.
Greensboro, NC 27409
- Federal Transit Administration Office of Civil Rights
Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

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 336-883-7278. 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.

Exceptions

1. 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
2. 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.

Provisions and Conditions
Not applicable

XI. Plan Monitoring and Evaluation

Evaluation of the success of any 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 records of outreach activities. See a summary in [APPENDIX C](#).
2. Copies should be kept of any print ads, and transcripts of any public service announcements.
3. Notes should be made after meetings regarding the overall tone of the meetings 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.
3. Translate PART's Title VI complaint procedure and form in multiple languages.
4. Establish a PART procedure that requires all written translation requests be routed through and managed by the Title VI coordinator to ensure consistency.
5. Create one-stop LEP information center for PART riders.
6. 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.

XI. Monitoring Subrecipients

PART does not have any sub recipient. So, no oversight is needed in this area.

XII. Minority Representation on Planning and Advisory Bodies

PART does not have any advisory bodies.

XIII. Title VI Equity Analysis

Part has not constructed a facility such as a vehicle storage facility, maintenance facility, or operations center.

XIV. Service Standards

Vehicle Load Standard

PART operates regional commuter bus transportation services throughout a 9-county region. Due to work shifts that vary the commuter bus Vehicle Load Standard is applied equally between peak and off-peak times. The average of all loads during the peak and off-peak operating periods should not exceed a load factor of 1.4. Refer to chart below for current standards:

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Load Factor
Sprinter	17	7	24	1.4
24’ LTV cutaway	18	7	25	1.4
40’ low floor bus	39	15	54	1.4

Vehicle Headways

Weekday PART service operates to and from four primary transportation centers. They include the Winston-Salem Transportation Center, Greensboro’s Galyon Depot, the High Point Broad Avenue Terminal and the PART Coble Transportation Center. On the primary urban routes during peak hours the most frequent service is on 30-minute headways. Urban routes during off-peak times have a 60-minute frequency. Rural area and Hybrid services are provided at various frequencies. During weekday service PART also provides shuttle services from the PART Coble Transportation Center to businesses around the PTI Airport area and northern High Point. This service is provided during peak (30 minute), off-peak and evening hours (hourly).

Saturday PART service is limited. Hourly service on routes 1(Winston Salem), 2 (Greensboro), 3 (High Point), and shuttles serving the airport area.

Weekdays	AM Peak	Midday	PM Peak	Evening
Urban Express (Rt 1, 2 & 3)	30 min	60 min	30 min	60 min

Rural Express & Hybrid (Rt 4, 9, 10 & 17)	Headway varies by route	Headway varies by route	Headway varies by route	—
Shuttles (Rt 20, 21, 22, 23 & 24)	30 min	60 min	30 min	60 min

Peak 6 am – 9 am, 3 pm – 6 pm, Off-Peak 9 am – 3 pm, Evening 6 pm – 9:15 pm;
 “—” = no service.

Saturdays	AM Peak	Mid-day	PM Peak	Evening
Urban Express Routes (Rt: 1, 2 & 3)	60 min	60 min	60 min	-
Shuttles (Rt: North & South)	60 min	60 min	60 min	-

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 “5.5” minutes late leaving a time-point on a scheduled trip. 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

PART Express routes are designed to connect our urbanized areas and complement the city transit systems of those UZA’s. PART provides access to major employment centers, central business districts, schools, universities and hospitals throughout a 9-county region. Access is made available through the use of Park & Ride Lots and designated stops. Due to the nature of commuter express service stops are limited along the routes. PART works very closely with our city and county members to provide access to all populations within the PART territorial jurisdiction.

XV. Service Policies

PART Amenities Policy

Policy: In accordance with Title VI of the Civil Rights Act, as amended it shall be the policy of the Piedmont Authority for Regional Transportation to assign amenities without regard to race, color, ethnicity and national origin. Amenity assignment refers to the process of placing amenities along various routes within the PART Express System.

Procedures: The installation of transit amenities shall be primarily based on the number of passenger boarding’s at bus stops and Park & Ride Lots along the route. These amenities include but are not limited to the following: seating, benches, shelters, canopies, informational signs, maps and schedules, digital and electronic signs, escalators and waste receptacles. Additional requirements for placement include safety, proper zoning approval if necessary and meeting all applicable building and construction laws. Request for transit amenities can be submitted through our Call Center or contactus@partnc.org. Each request will be reviewed in a timely manner.

PART Vehicle Assignment Policy

Policy: In accordance with Title VI of the Civil Rights Act, as amended it shall be the policy of the Piedmont Authority for Regional Transportation to assign vehicles without regard to race, color, ethnicity and national origin.

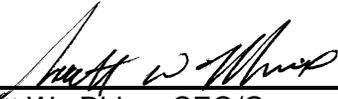
Procedures: All commuter bus routes are ADA accessible and are equipped with a voice announcement stop announcement system, wheel-chair ramps or lifts, bus kneeling feature, bicycle racks, air-conditioning and destination signage.

Bus assignments consider the operating characteristics such as length, width, height and the turning radius of the bus. The physical route requirements are taken into consideration when assigning buses.

Related Documents

FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients

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



September 14, 2022

Scott W. Rhine, CEO/General Manager
Piedmont Authority for Regional Transportation

Date

APPENDIX A : TITLE VI COMPLAINT PROCEDURES

Title VI Information, Limited English Proficient (LEP) information and Complaint Process (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

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 the following information:

1. Name, address, and telephone number of the complainant.
2. The basis of the complaint (race, color, national origin).
3. The date or dates on which the alleged discriminatory event or events occurred.
4. The nature of the incident that led the complainant to feel discrimination was a factor.

5. Names, addresses and telephone numbers of persons who may have knowledge of the event.
6. Other agencies or courts where complaint may have been filed and a contact name.
7. Complainant's signature and date.

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.

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 alleged incident.

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

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.

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.

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.

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

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

FTA complaint procedures can also be found on the FTA web site at: www.fta.dot.gov. These procedures are also outlined in FTA Circular 4702.1B, Chapter IX.

A Title VI complaint must be submitted in writing. PART strongly encourages the use of the **PART Title VI Complaint Form** when filing official complaints. Upon completion of a PART Title VI Complaint Form, send it to:

Director of Commuter Operations
Piedmont Authority for Regional Transportation
107 Arrow Road
Greensboro NC 27409

**Title VI Civil Rights
Complaint Form**

Section I:

Name: _____

Address: _____

City, State, Zip: _____

Telephone Numbers:

Home: _____ Work: _____ Cell: _____

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 []

Have you filed a lawsuit regarding this complaint? Yes [] No []

If yes, please provide the case number and attach any related material: _____

(Note: The 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 V:

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

If yes, what was your PART Complaint No.? _____

Section VI:

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

Please sign here: _____ **Date:** _____

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

Please mail your completed form to:

**PART
Director of Commuter Operations
107 Arrow Rd.
Greensboro, NC 27409**

APPENDIX B: LIST OF INVESTIGATIONS, LAWSUITS AND COMPLAINTS

	<u>Date (Month, Day, Year)</u>	Summary (include basis of complaint: race, color, or national origin)	<u>Status</u>	<u>Action(s) Taken</u>
<u>Investigations</u>	None	None	None	None
<u>Lawsuits</u>	None	None	None	None
<u>Complaints</u>	None	None	None	None

NOTE to reviewer(s): “No Title VI Complaints were received for the period of FFY 20 – 22

APPENDIX C: Service Changes and Outreach Summary

Service Changes:

Almost all service changes during FFY 20-22 were Covid Pandemic related during this period. Entries 1 and 12-14 in the list below were not Pandemic related.

1. January 6, 2020 – Route 6 add a stop; Route 10 delete an unused trip and make last trip of the day drop-off only; Route 17 move Town Hall stop and add a stop; and Route 28 make poorly used trips drop-off only and add a stop.
2. March 25, 2020 – Routes 1, 2, 3 and the shuttles began operating on a Saturday schedule throughout as part of Covid-19 response.
3. March 25, 2020 – Routes 4, 9, 10, 19 and 28 were suspended and Route 6 ran on a reduced schedule (2 AM and 2 PM trips).
4. April 6, 2020 – Route 5 was suspended
5. April 27, 2020 – Routes 9 and 10 were suspended.
6. June 15, 2020 – Routes 1, 2, 3 and the shuttles were restored to pre-COVID 19 service levels.
7. July 6, 2020 – Formally ended Route 28 service due to the end of funding from FHWA for the Bus40/Salem Parkway mitigation efforts.
8. July 6, 2020 – Route 6 & 17 schedules and routings adjusted.
9. August 3, 2020 – Airport area shuttles began fixed route service all day, Route 27 became Route 24 and no longer serves PTIA. Route 4 was reinstated.
10. September 8, 2020 – Routes 9 and 10 were reinstated. Route 9 began a new alignment deleting segment that is done with more frequency by Davidson County Transportation.
11. November 2, 2020 – Tripper removed from Route 2, schedule adjustments on Route 4, Pleasant Ridge Rd stops changed to deviation only on Route 20
12. January 4, 2021 – Adjustments to timetables on Routes 6, 9, 10.
13. April 5, 2021 – Route 4 adjustments in Chapel Hill (temporarily no direct service to Ambulatory Care Center).
14. May 17, 2021 – Route 1 added stop at Union Station in Winston-Salem.
15. July 11, 2021 – Route 5 discontinued.
16. June 30, 2022 – Route 6 Surry Express ended due to Surry County leaving PART membership.
17. August 1, 2022 – Route 10 added service to NC Zoo and added frequency. Routes 4 and 9 minor timetable adjustments.

Public Outreach:

During the FFY 20-22 period, there was no face-to-face outreach due primarily to the Covid-19 Pandemic. The 5.5 months of this period which occurred before the pandemic shutdown had no face-to-face outreach. And the climate for such outreach has not yet returned.

Throughout FFY 20-22, PART depended on the PART website, social media outlets, direct emails and communication with riders at the Coble Transportation Center and onboard buses.

1. Public outreach for all service adjustments throughout FFY 20-22 were made a month in advance when planning was possible and included direct email to customers on e-mailing lists for effected routes, PART website, social media and passenger apps.

2. Occasionally driver shortages during the pandemic did not allow for 30 days' notice that a certain trip or trips on one or more routes would be cancelled for a particular period. Nonetheless outreach to notify the public included direct email to customers on e-mailing lists for effected routes, PART website, social media and passenger app announcements
3. Announcements for Inclement Weather were announced via the PART website, passenger apps, social media and emails when the weather effected service delivery.
4. Periodic announcements on the federal mask mandate for transit passengers and staff were made throughout the pandemic via social media and email. The mandate was posted on buses and at all PART facilities and the PART website.
5. Outreach was made ahead of the 2020 election for free rides to the polls via email and social media.
6. Holiday service levels were announced via the PART website, passenger apps, social media and emails. A calendar of holiday service levels is posted on PART fixed route vehicles and in public areas of PART facilities.
7. Three customer surveys took place during FFY 20-22. The first in Oct. 2019 was electronic only. The second and third in May/June 2022 were offered electronically and in paper format. All surveys were announced through social media, direct email and the PART website. The May/June surveys included a paper option made available to passengers on bus and at passenger facilities. One of these surveys was system wide for PART and participating urban systems in the region. The other was specific to the people of Asheboro, NC and covered local transit and commuter transit questions as well as other transportation questions. The Asheboro survey was widely distributed in paper form through direct mail as well as available at county and city sites.
8. Changes in passenger apps were announced via electronic means and printed signs on PART vehicles and facilities.

APPENDIX D: 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 Burlington, Greensboro, High Point, Winston-Salem, and the Counties of Alamance, Davidson, Forsyth, Guilford and Randolph PART Express provides services to connect locally operated public transit services. PART is a direct recipient of Section 5307 funds to urbanized areas and 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.

Applicability

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 the 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.

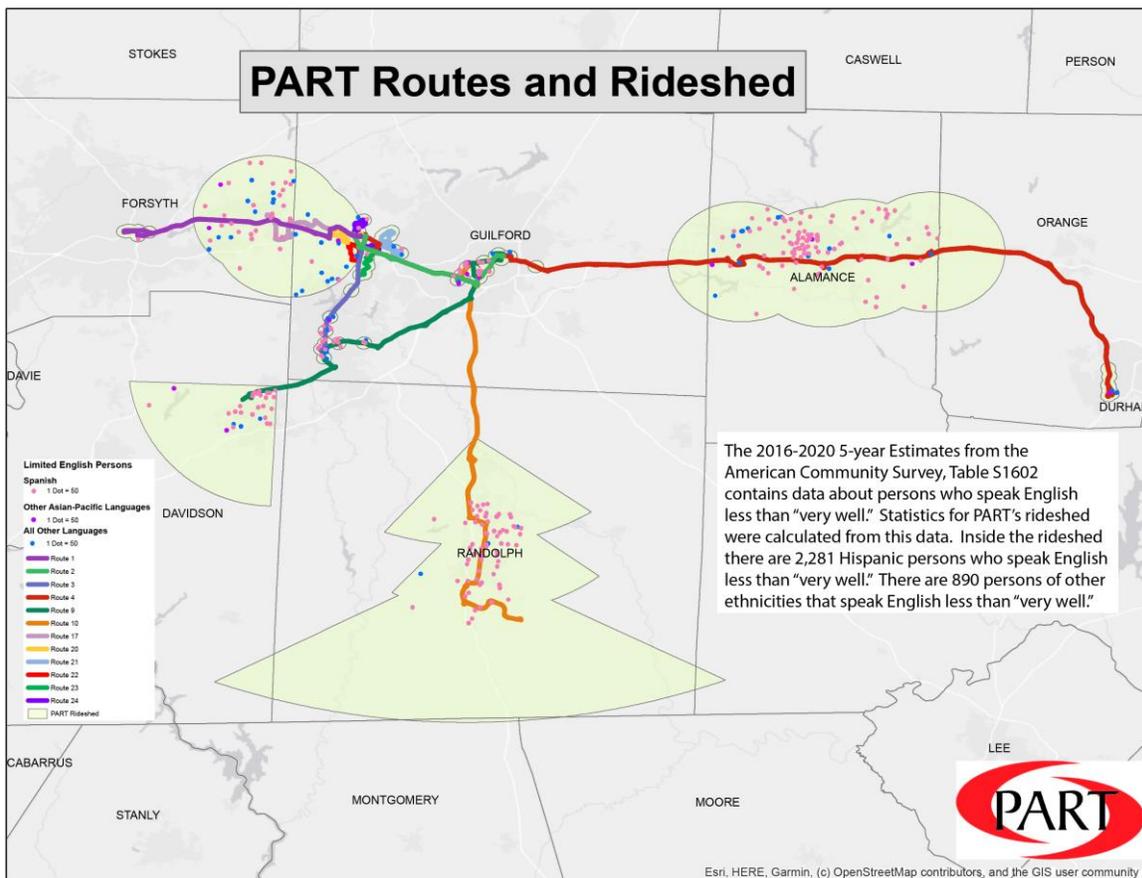
Title VI Compliance Officer – The PART point of contact concerning Title VI related items.

Substantial number of LEP (Safe Harbor Threshold) – 5% or 1,000 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 English-only speaking members of 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 6 counties. The following information is based on 2017 US Census American Community Survey information.

The data that is presented is for the PART Express service area which consists of the PART ride-shed which includes parts of six (6) North Carolina counties: Alamance, Davidson, Forsyth, Guilford, Orange and Randolph.



The PART Express system connects several communities to three (3) urban cores and their urban fixed route transit systems' terminals through a series of park-and-ride lots and other bus stops. PART's service area is made up of the communities/neighborhoods around these bus stops. Rural park & ride lots attract persons from a wide geographic area who generally drive or ride with others in vehicles to access commuter express services. This population tends to be directionally dispersed, meaning they live in a fan shaped area farther away from the bus route's urban destination than the location of the bus stop they use. Park & ride lots located along Hybrid express services also attract persons from a wide geography, but this population is fairly evenly dispersed regarding direction. Within an urban core the population attracted to a bus service is generally within walking or cycling distance of a bus stop—therefore the geographic distribution of riders is restricted to around a ½ mile. The PART service area (or ride-shed) has a population of 345,714 individuals based on the U.S. Census Bureau, 2020 Census Redistricting Data. The PART rideshed is much smaller in 2022 than it was in 2019 (see Appendix C: Service Changes and Outreach Summary). Four routes (5, 6, 19 and 28) are no longer operated by PART. Three due to funding being discontinued and the fourth due to a replacement routing on other PART services which have greater frequency. This change has greatly reduced the PART rideshed area by nearly 740 square miles—or roughly half.

Racial Breakdown – 21.5% service area's population is African American. 56.8% is White/Caucasian. The next largest racial group is Two or more Races.

Of the ride-shed area's residents, ethnic Hispanic/Latino persons represent 13.6%.

Race	Total Population	Percent
White/Caucasian	196486	56.8%
African American	74333	21.5%
American Indian/Alaskan Native	1214	0.4%
Asian	11806	3.4%
Hawaiian/Pacific Islander	129	0.0%
Other	1574	0.5%
Two or more Races	13149	3.8%
Ethnicity		
Hispanic/Latino	47022	13.6%
Total Population in Ride Shed	345,714	100%

U.S. Census Bureau, 2020 Census Redistricting Data

Spoken Language – The following data includes the PART express service area, those persons 5 years of age or older and both Native- and Foreign-born persons (U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates). 84.9% of the population speaks only English, leaving 15.1% that are able to speak a language other than English—this represents 48,473 persons. Of that population 5.4% or 17,362 indicate that they speak English less than “very well.”

Looking only at all persons who speak English less than “very well”, Spanish speakers make up the largest group at 4.1% or 13,183 people.

Household Language by Linguistic Isolation – A "limited English-speaking household" is a household in which no household member 14 years old and older (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and over

have at least some difficulty speaking English. These residents have a particular challenge navigating American transit, and transit systems have a challenge providing a simple, no-hassle rider experience to members of these households.

Households in the PART service area (rider-shed) who:	Total	Percent
Speak Spanish	11,499	8.8%
Spanish speakers who speak English less than “very well”	2,281	1.7%
Speak an Indo-European Language (other than English only speakers)	2,736	2.1%
Indo-European speakers who speak English less than “very well”	204	0.2%
Speak an Asian & Pacific Island (PI) Language	2,652	2.0%
Asian & PI language speakers who speak English less than “very well”	508	0.4%
Speak a language not mentioned above	821	0.6%
Other languages speakers who speak English less than “very well”	178	0.1%
Total Households	130,722	100%

U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates (Table S1602)

Action Steps

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 to determine the LEP language groups present in the area and specific language services that are needed. The four factor analysis 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 American Community Survey data table C16001 from US Census to determine the demographic makeup of the community. To get specific data related to 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, PART has utilized the geographic area that constitutes its ride-sheds, encompassing Park and Ride Lots and 0.5-mile buffer on all other PART stops. The total area covered is 763.7 square miles with a total population of 320,721.

Based on review of the data and calculating the Safe Harbor Threshold, PART has identified the LEP population languages in the area as Spanish. There are over 1000 individuals in the PART

service area who speak English less than very well and are fluent in Spanish.

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.

Language Spoken at Home for Those Who Speak English Less Than 'Very Well'.

Language	# of Individuals
Spanish	13,183
French, Haitian, Cajun	196
German, West Germanic	90
Russian, Polish, Slavic	84
Other Indo-European	708
Korean	441
Chinese	479
Vietnamese	580
Tagalog, Filipino	76
Other Asian Pacific	888
Arabic	242
Other	395

U.S. Census Bureau, 2016-2020 American Community Survey 5-Year Estimates (Table C16001)

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 had no requests for interpreters, and no requests for translated documents in FFY 2020-2022.

Survey Results – PART completed an Onboard Passenger survey in 2016. 585 persons completed the survey. In 2019 PART completed a Customer Satisfaction Survey. The results from the surveys show a different rider demographic between the two—potentially a product of in-person scientific sampling (onboard) and an online and paper survey open to any rider (customer service). While PART’s ridership has consistently been predominantly white and black the percentages vary. We could infer a low percentage of LEP persons currently using the system. When compared to the entire service area, ridership does not closely match the

demographics of the ride-shed.

	Within PART Service Area	Rider Profile Onboard Survey	Rider Profile Customer Satisfaction Survey 2019
White (non-Hispanic)	56.8%	23.6%	33.1%
Black / African American (non-Hispanic)	21.5%	65.3%	40.7%
Hispanic Ethnicity	13.6%	3.5%	2.7%
Other races	21.7%	5.2%	5.7%

There is disparity between the percentage of Hispanic people living in the PART ride-shed and the percentage of Hispanic persons taking advantage of PART services. There is also disparity between the percentages of white and black persons within the ride-shed and the percentages which take advantage of PART Express. The white and the Hispanic populations both share a larger percentage of the ride-shed's total population, yet a smaller percentage of the PART rider profile.

Respondent Profile (Surveys)		Onboard	Customer Satisfaction
Gender	Male	49.7%	31.7%
	Female	49%	48.4%
Age	16 – 17	0.7%	8.7%
	18 – 24	13.2%	
	25- 34	23.1%	16.3%
	35 – 49	29.7%	25%
	50 - 64	28.3%	29.9%
	65 – 74	2.6%	4.1%
	75+	0.3%	1%
Race/Ethnicity	Black/African America	65.3%	40.7%
	White/Non-Hispanic	23.6%	33.1%
	Asian	0.7%	1.3%
	Other Race	4.5%	4.4%
	Hispanic/Latino Ethnicity	3.5%	2.7%

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.

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.

PART provides important transportation services to the public through fixed route public transportation program. PART connects the major cities of the Piedmont and brings people from the outlying counties into the urban areas. PART also provides services to connect to Amtrak railway stations. PART riders utilize services to commute to work, going to school/universities, occasionally for special events and also in lieu of reliance on a personal automobile.

4. The resources available to PART and costs.

PART has identified in-house staff with language abilities apart from English, and this staff has some availability to assist with requests related to PART services, including transit. PART has also identified some businesses and technological solutions that provide translation and interpretative services, these services would be utilized on as needed basis. 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.

PART website has the capability to translate all the information to multiple languages including Spanish through Google Translate.

Based on the Four Factor Analysis, PART determined to have a Language Assistance Plan for the Spanish Population.

LANGUAGE ASSISTANCE PLAN

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:

1. Communicate and coordinate with the 4 MPO's of our territorial jurisdiction.
2. Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
3. 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.

Language Assistance Measures - PART may implement the following LEP procedures as appropriate:

1. 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.
2. Public notice, publications, and other material, including webpage content, may be made available in other languages.
3. Utilize translators at select public meetings; and
4. Use a telephone translation service such as AT&T's Language Line, and web translation applications such as Alta Vista.

Training – PART implements training for PART front-line employees on Title VI and LEP considerations through NCDOT and with our local Contract Management provider. These training opportunities occur on planned schedules and also include opportunities for virtual training

seminars provided from the video session from LEP.gov. Front-line employees or contractors who come in contact with LEP individuals are Bus Operators, Call Center Representatives, Operations and Marketing staff. LEP training include understanding Title VI responsibilities, what procedures to follow when encountering an LEP person and how to potentially handle a Title VI complaint.

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

1. Posters and brochures will be made available through Local Universities and Community Colleges, MPO offices, local DOT's, and other locations.
2. PART website will indicate ways in which LEP persons can access information about our services.
3. The PART Notice of Rights under Title VI to the public is available at the PART office and Coble Transportation Center. It is also posted on PART fixed-route vehicles.
4. 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 available in an alternative language, based on known LEP population in the area.

Monitoring, Evaluating and Updating the LEP & LAP Plans

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. 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:

1. How many LEP persons were encountered?
2. Were their needs met?
3. What is the current LEP population in PART service area?
4. Has there been a change in the types of languages where translation services are needed?
5. Is there still a need for continued language assistance for any previously identified PART programs? Are there other programs that should be included?
6. Have PART's available resources, such as technology, staff, and financial costs changed?
7. Has PART fulfilled the goals of the LEP Plan?
8. Were any complaints received?

Dissemination of the LEP & LAP Plans

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 Director of Commuter Operations.

PART Director of Commuter Operations
107 Arrow Road
Greensboro, NC 27409